

IRWM PLAN REVIEWERS ARE LISTED IN ALPHABETICAL ORDER

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 BROWN is Neal Brown of Padre Dam MWD
 CIN is Kasey Cinciarelli
 CK is Coastkeeper (Unidentified reviewer)
 COLL is Noelle Collins (Acquiring Willow Glen Farm)
 FRANZ is Karen Franz of CoastKeeper
 GIB is Doug Gibson (San Elijo Lagoon Conservancy)
 HAZ is Lisa Hazard
 HEN is Kelly Hendrickson (San Diego Zoological Society)
 HUT is Rob Hutsel (The San Diego River Park Foundation)
 JDANA is Dana Johnson of SFID
 JMEG is Megan Johnson, Southern California Wetlands Recovery Project
 KIM is Ed Kimura, Sierra Club
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 NYG is Diane Nygaard
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 ROD is Many Rodriguez of Olivenhain
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 WAT is Richard Watson, Richard Watson & Associates
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 WOLL is Leslie Wollenweber (San Dieguito River Valley Conservancy)
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INITIAL DRAFT
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COMMENT NO.	PAGE	PARAGRAPH	SECTION, FIGURE, or TABLE	COMMENT	RESPONSE TO COMMENT Bold font indicates proposed changes to the Draft IRWM Plan
ALEX-1	2	Appendix 7	Table 1	Objectives Met by IRWMP Projects: IRWM Objectives A, B, and C are missing from this table.	Table 1 of Appendix 7 will be updated to address the comment.
ALEX-2	3	Appendix 7	Table 1	Objectives Met by IRWMP Projects, JWA NCCP/HCP INITIAL IMPLEMENTATION: According to Table D-5 on page D-18 of the draft document, the project would meet four objectives that were not credited in preliminary scoring. These include: OBJECTIVE D (Develop and maintain a diverse mix of water resources): This project would incorporate four water management strategies that primarily and directly support attainment of OBJECTIVE D. The project would provide regulatory certainty to participating water agencies in the siting, development, maintenance, and operation of facilities necessary to provide water and wastewater services to the public while conserving biological resources more effectively. OBJECTIVE G (Effectively reduce sources of pollutants and environmental stressors): This project would incorporate five water management strategies that primarily and directly support attainment of OBJECTIVE G. The project would implement the comprehensive planning of the JWA NCCP/HCP that involves land use controls on activities negatively affecting the quality and quantity of water and other natural resources.	The project has been rescored to provide credit for Objective G. Because the project provides only an indirect water supply benefit, credit is not given from Objective D.
ALEX-3	3	Appendix 7	Table 1	Objectives Met by IRWMP Projects, JWA NCCP/HCP INITIAL IMPLEMENTATION: According to Table D-5 on page D-18 of the draft document, the project would meet four objectives that were not credited in preliminary scoring. These also include: OBJECTIVE H (Protect, restore, and maintain habitat and open space): This project would incorporate seven water management strategies that primarily and directly support attainment of OBJECTIVE H. Through comprehensive habitat management and protection within the JWA Conservation Easement Area, the project would provide for invasive species removal, water quality protection, revegetation, and wetlands creation and enhancement. OBJECTIVE I (Optimize water-based recreational opportunities): This project would incorporate seven water management strategies that primarily and directly support attainment of OBJECTIVE I. The proposal provides for the enhancement and continued operation and maintenance of water-dependent recreational opportunities within the JWA lake and reservoir lands.	The project has been rescored to provide credit for Objectives H and I.

ALEX-4	17	Appendix 7	Table 3	Water Management Strategies, JWA NCCP/HCP INITIAL IMPLEMENTATION: The project addresses the following strategy that was not included in preliminary scoring: STRATEGY 17, Reoperation and Reservoir Management: Operations and management covered under the JWA NCCP/HCP include the continued balancing of water supplies between surface water storage facilities to optimize capacities. Examples include transfers of water from Cuyamaca to El Capitan via the San Diego River and from Loveland to Sweetwater via the Sweetwater River.	The project information has been corrected to include the reoperation and reservoir management strategy.
ALEX-5	31	Appendix 7	Table 4	Project Scoring, JWA NCCP/HCP INITIAL IMPLEMENTATION: ENVIRONMENTAL JUSTICE benefits of this project should be re-evaluated. The JWA Partners' service areas include people of all races, cultures, and incomes who will benefit from the streamlined permitting of water and sewer service projects. The project provides habitat preservation and continued operation and management of recreational facilities that enhance the overall quality of life for residents of the San Diego Region.	No change. To receive credit for EJ, the project should clearly identify communities, their concerns and how the project addresses those concerns.
ALEX-6	31	Appendix 7	Table 4	Project Scoring, JWA NCCP/HCP INITIAL IMPLEMENTATION: This project's benefit to GENERATE NEW WATER should be re-evaluated. The JWA NCCP/HCP describes expanded use of recycled water sources for irrigation or groundwater basin recharge and will facilitate permitting and implementation of these projects.	Though the JWA NCCP/HCP promotes recycled water usage, the project itself does not create recycled water. However, based on the projects inclusion of invasive species removal, the project has been rescored to include credit for generating new water.
ALEX-7	10-2	Appendix 10	Appendix 10	IRWM Tier 1 Projects, Feasibility, Schedules, Costs, JWA NCCP/HCP INITIAL IMPLEMENTATION: The PLANNING/STUDY FINISH date should be revised to 2008 because the public review period for the joint EIR/EIR for the project will begin in late 2007.	The database and appendices have been updated to reflect the comment.
ALEX-8	10-2	Appendix 10	Appendix 10	IRWM Tier 1 Projects, Feasibility, Schedules, Costs, JWA NCCP/HCP INITIAL IMPLEMENTATION: The ENV. DOCS/PERMITTING FINISH date should be revised to 2008 to allow adequate time for wildlife agency approval and permitting.	The database and appendices have been updated to reflect the comment.
ALEX-9	10-2	Appendix 10	Appendix 10	IRWM Tier 1 Projects, Feasibility, Schedules, Costs, JWA NCCP/HCP INITIAL IMPLEMENTATION: The IMPLEMENTATION date should be revised to 2008 to allow adequate time for public review of the environmental document and for wildlife agency approval and permitting.	The database and appendices have been updated to reflect the comment.
ALEX-10	11-4	Appendix 11	Appendix 11	IRWM Tier 1 Projects, Benefits and Impacts, JWA NCCP/HCP INITIAL IMPLEMENTATION: Additional project benefits are not included in the SUMMARY OF PROJECT BENEFITS but should be added: (5) provide regulatory certainty to participating water agencies in the siting, development, maintenance and operation of water and/or wastewater facilities; and (6) reduce constraints on public facility development that result from the uncoordinated application of federal and state resource protection laws.	The database and appendices have been updated to reflect the comment.
ALEX-11	6	Appendix 7	Table 1	Objectives Met, SAN DIEGO REGION - FOUR RESERVOIR INTERTIE PROJECT FEASIBILITY STUDY: According to Table D-5 on page D-18 of the draft document, the project would meet two objectives that were not credited in preliminary scoring. OBJECTIVE D (Develop and maintain a diverse mix of water resources): This project would address five water management strategies to achieve IRWMP Objective D, including increased water supply reliability in the San Diego Region; enhanced ability to store and treat a large volume of water on an ongoing basis; and reduced impacts of drought and/or supply interruption emergencies. OBJECTIVE I (Optimize water-based recreational opportunities): Potentially greater volumes of water in El Capitan and Loveland Reservoirs will protect and enhance water-dependent recreational opportunities already present there. The project will also provide environmental and habitat protection and improvement benefits because greater water volumes in the reservoirs on a predictable basis will create more shoreline and wetland habitat and will provide larger surface areas for use by migratory waterfowl.	The project has been rescored to provide credit for Objective D. Because the project provides only an indirect recreational benefit and is not designed to optimize water-based recreational opportunities, credit is not given from Objective I.
ALEX-12	11	Appendix 7	Table 2	Geographic Distribution of Plan Projects, SAN DIEGO REGION - FOUR RESERVOIR INTERTIE PROJECT FEASIBILITY STUDY: Linking the reservoirs would improve the Region's water supply reliability and would provide the important benefit of increasing the ability to capture and store "local" water. The project has the potential of benefiting approximately 1.5 million residents in San Diego County. Therefore, ALL HYDROLOGIC UNITS in San Diego County would be affected by this project because project benefits would extend well outside the limits of the four reservoirs.	The modification to the project application has been accepted, and the project has been rescored.
ALEX-13	23	Appendix 7	Table 3	Water Management Strategies, SAN DIEGO REGION - FOUR RESERVOIR INTERTIE PROJECT FEASIBILITY STUDY: The preliminary scoring shows that the project addressed STRATEGY 17 (Reoperation and Reservoir Management), although it was not credited on the Project Prioritization Scorecard. The ability to move imported and local water in and out of the four reservoirs will enable management of these surface storage facilities to optimize the availability and quality of stored water supplies and to protect/enhance beneficial uses.	The Project Prioritization Scorecard has been corrected.

ALEX-14	23	Appendix 7	Table 3	Water Management Strategies, SAN DIEGO REGION - FOUR RESERVOIR INTERTIE PROJECT FEASIBILITY STUDY: STRATEGY 28 (Conjunctive Use): The scoring note on the Project Prioritization Scorecard states that the description provided in the application does not clearly address how the use of groundwater and surface water supplies will be coordinated. For clarification: The Intertie project will improve the ability to manage local water resources by enabling transfers of water in wet years from reservoirs which are nearing capacity to those in which capacity remains, thereby reducing loss from overtopping of dams as occurred at Lake Hodges in 2005. Moving this water into Loveland, in one example, would enable the Sweetwater Authority to balance deliveries of water from local sources between that in the reservoir system and groundwater produced by the Reynolds Desalination Facility and National City Wells. These coordinated actions are in addition to the ability to store imported water for the first time.	Based upon the clarifying information, the San Diego Region - Four Reservoir Intertie Project Feasibility Study has been credited with the conjunctive use strategy.
ALEX-15	37	Appendix 7	Table 4	Project Scoring, SAN DIEGO REGION - FOUR RESERVOIR INTERTIE PROJECT FEASIBILITY STUDY: This project would BENEFIT DISADVANTAGED COMMUNITIES by increasing the Region's ability to efficiently supply water at the lowest possible cost. Areas of disadvantaged communities within Sweetwater Authority's service area include portions of the City of National City and portions of western Chula Vista. There are also identified disadvantaged communities within the service area of the City of San Diego.	The modification to the project application has been accepted, and the project has been rescored.
ALEX-16	37	Appendix 7	Table 4	Project Scoring, SAN DIEGO REGION - FOUR RESERVOIR INTERTIE PROJECT FEASIBILITY STUDY: ENVIRONMENTAL JUSTICE benefits of this project should be re-evaluated. If determined to be feasible, the project would enhance the ability to equitably provide a safe and dependable drinking water supply to approximately 1.5 million water users without regard to race, culture, or income. This would occur in the service areas of the City of San Diego and Sweetwater Authority, specifically, and regionally through the enhanced ability to store and manage water resources.	No change is proposed. To receive credit for EJ, the project should clearly identify communities, their concerns and how the project addresses those concerns.
ALEX-17	10-3	Appendix 10	Appendix 10	IRWM Tier 1 Projects, Feasibility, Schedules, Costs, SAN DIEGO REGION - FOUR RESERVOIR INTERTIE PROJECT FEASIBILITY STUDY: The PLANNING/STUDY FINISH date should be revised to 2010. The feasibility study could be undertaken as soon as funding becomes available but would require approximately 18 months for completion.	The database and appendices have been updated to reflect the comment.
ALEX-18	10-3	Appendix 10	Appendix 10	IRWM Tier 1 Projects, Feasibility, Schedules, Costs, SAN DIEGO REGION - FOUR RESERVOIR INTERTIE PROJECT FEASIBILITY STUDY: The IMPLEMENTATION date should be revised to 2010. The feasibility study could be undertaken as soon as funding becomes available but would require approximately 18 months for completion.	The database and appendices have been updated to reflect the comment.
ALEX-19	12-3	Appendix 12	Appendix 12	IRWM Tier 1 Projects, Conformance with Statewide Priorities and Program Preferences, SAN DIEGO REGION FOUR RESERVOIR INTERTIE PROJECT FEASIBILITY STUDY: The project application did not indicate that the project would address the statewide priority of ASSIST IN MEETING BAY DELTA WATER QUALITY OBJECTIVES.	The database and appendices have been updated to reflect the comment.
ALEX-20	12	Appendix 7	Table 2	Geographic Distribution of Plan Projects, SOUTH SAN DIEGO COUNTY WATER SUPPLY STRATEGY: As South San Diego County's dependence on imported water is reduced by implementation of this project, other populations within Southern California will also benefit. Therefore, ALL hydrologic units in San Diego County would be affected by this project because project benefits would extend outside South San Diego County.	The modification to the project application has been accepted, and the project has been rescored.
ALEX-21	25	Appendix 7	Table 3	Water Management Strategies, SOUTH SAN DIEGO COUNTY WATER SUPPLY STRATEGY: The project addresses two strategies that were not credited in preliminary scoring. STRATEGY 8 (Economic Incentives): Implementation of the project, including efficient coordination and sustainable management of the water resources of the San Diego Formation, should demonstrate the economic incentives resulting from use of local resources in South San Diego County, and could result in adjustments to water pricing resulting from the reduced need for imported water. STRATEGY 16 (Regional Surface Storage): Expanded use of the San Diego Formation has the potential to significantly supplement local water supplies and reduce dependence on imported water, thus increasing imported water surface storage opportunities.	The modification to the project application has been accepted, and the project has been rescored.
ALEX-22	38	Appendix 7	Table 4	Project Scoring, SOUTH SAN DIEGO COUNTY WATER SUPPLY STRATEGY: The ENVIRONMENTAL JUSTICE benefits of this project should be re-evaluated. The project would provide a comprehensive and coordinated approach to sustainably use the groundwater resources of the San Diego Formation that would result in benefits to people of all races, cultures, and incomes. Water users within South San Diego County would be served by new or expanded operating facilities. As South San Diego County's dependence on imported water is reduced by project implementation, other populations within Southern California will also benefit.	No change is proposed. To receive credit for EJ, the project should clearly identify communities, their concerns and how the project addresses those concerns.

ALEX-23	12-3	Appendix 12	Appendix 12	IRWM Tier 1 Projects, Conformance with Statewide Priorities and Program Preferences, SOUTH SAN DIEGO COUNTY WATER SUPPLY STRATEGY: The project application did not indicate that the project would address the statewide priority of ASSIST IN MEETING BAY DELTA WATER QUALITY OBJECTIVES.	The database and appendices have been updated to reflect the comment.
ALLEN-1				No where does the plan so far as recycling is concerned identify that generic technology identified as Living Machines, ecologically engineered waste water systems. As that technology has come to be applied it has redefined water sheds to include urban sites and buildings, all of which are candidates for the application of on site water recycling from the single family residence, to high rise office buildings, to subdivisions and shopping centers, to campuses and dormitories. These systems are likely the most sustainable use of water in any human environment. The particular system with which I am acquainted is the Solar Aquatic System. It collects, and processes effluent producing tertiary water for on site reuse in flushing toilets, air conditioning, irrigation, stream or ground water augmentation The system returns 90% of its influent for reuse. An O/R system added to the end of the process would yield potable water. The details of the operation of these systems is described at www.ecological-engineering.com.The same technology incorporates storm water so that it can be captured and used to replace source water that otherwise must be purchased.	No change is proposed. The IRWM Plan addresses water reclamation in a general sense, and does not promote nor compare means of recycled water treatment. Recycled water within California must meet specific DHS treatment and disinfection standards, and recycled water treatment methods currently in use within the County currently meet these standards. The cited SAS system doesn't meet DHS recycled water standards without additional treatment. Groups interested in promoting or studying alternative treatment technologies, however, can submit proposed projects to assess such technologies and their applicability to the Region.
ASH-1	B-2	1		Define EBEB in text.	Text on page B-2 will be modified as suggested.
ASH-2	B-2	2		MS4 = municipal separate storm sewer system (check Acronym List as well)	Text on page B-2 will be modified as suggested.
ASH-3	B-2	3		Specify that you are discussing <u>Region 9</u> of the RWQCB, and add the work "also" includes the southern portions...	Text on page B-2 will be modified as suggested.
ASH-4	B-11	4		A long-term historical look at rainfall in SD is helpful and will clearly show 30-year trends. We are currently in the depths of a drought period.	Text will be added to page B-11 to note that the region is currently in a drought.
ASH-5	B-18	2		There re too many "Carlsbad HU"s in the paragraph.	Text on page B-18 will be modified as suggested.
ASH-6	B-18	2		Discuss reservoirs in Carlsbad HU - Olivenhain, others?	Text will be modified to note that Dixon, Wohlford, and Olivenhain Reservoirs are within the Carlsbad HU.
ASH-7	B-18	3		Add "Five of the regions 10 lagoons are in the Carlsbad HU" and note that they are the subject of a current TMDL development process for bacteria, sediment, nutrients, and TDS.	Text on page B-18 will be modified as suggested.
ASH-8	B-27	1		In addition, all copermittees are required to implement stormwater programs on a watershed basis following the boundaries of the WMAs.	Text on page B-27 will be modified as suggested.
ASH-9	B-27	4		Buena Vista Lagoon Foundation	Text on page B-27 will be modified as suggested.
ASH-10	B-28	1		Why not list other NGOs - Coastkeeper, Preserve Calaveras, Friends of Agua Hedionda Creek, etc.	Text on page B-28 will be modified as suggested.
ASH-11	B-28	5		Remove the word "heavy"	Text on page B-28 will be modified as suggested.
ASH-12	B-36	2		Region 9 has initiated TMDL studies for 10 local lagoons. It is under Order 2006-076 and includes bacteria, sediment, nutrients, and TDS.	Text on page B-29 will be modified as suggested.
ASH-13	B-39		T B-16	I'm not aware of "organic toxics" for the Carlsbad H. Diazinon has dropped off to a point where it is not a COC any longer.	No change proposed. Toxics are still listed as a COC in the Project Clean Water website and is still addressed as a COC in the stormwater monitoring efforts
ASH-14	B-40	1		change "closure" to "advisory" - Talk to Sheri McPherson about the distinction.	Text on page B-40 will be modified as suggested.
ASH-15	B-41		T B-12	Bacteria exceedance do not "close" a beach, they "post " a beach. Closures are only for sewage.	Text on page B-41 will be modified as suggested.
ASH-16	O-6	3		In addition, the San Diego IRWM is coordinating with the La Jolla Shore Integrated Coastal Watershed Management (ICWM) Plan . The La Jolla Shores ICWM Plan was funded as an IRWM and includes a coastal watershed that discharges into the Regions only two Areas of Special Biological Significance (ASBS). The La Jolla Shores ICWM is fully within the San Diego region.	Page O-6 will be modified as suggested.
ASH-17	M-8		T-M-3	Add subwatershed plans within the Carlsbad Watershed, including the <i>Escondido Creek Watershed Restoration Action Strategy</i> (see Appendix and the <i>Agua Hedionda Creek Watershed Management Plan</i> (currently under preparation with Prop 40 Grant Funding and recommended by the SWRCB to be part of the IRWM process). See below for description.	Section M.1 will be modified as suggested.

ASH-18	M-9		T-M-4	Footnote 4: The County served as lead agency with urban runoff Copermittees to develop a The Copermittees within each watershed developed independent Watershed Urban Runoff Management Plans with the County acting as the lead coordinating agency.	Footnote 4 will be modified as suggested.
ASH-19	A-3	2		Is the reference to Chapter G (Implementation) correct or should it be Chapter M?	The reference to Section G is correct. Paragraph 2 of page A-3 will be modified to add the language "short-term priorities" after the words "will be required to".
ASH-20	A-4			This section should discuss and reference the MOU between the RWMG.	Section A.1 will be modified to reference the MOU.
ASH-21	A-11		Table A-2	Jurisdictional Issues: I think that this section should also recognize conflicts and resolution of issues between NGO's or environmental organizations and jurisdictions. The IRWM and RAC has done a great job of setting an example of bringing these two groups together. Currently there is fragmentation within organizations and between organizations that the IRWM process can resolve for greater efficiency in program implementation.	Text within Section A.3 will be revised to note the need to recognize and resolve conflicts between agencies and NGOs/environmental organizations.
ASH-22	G-1	2		The first sentence of Section G-1 doesn't make sense.	Text on page G-1 will be modified to insert the words "priorities and" after "short-term" in the first sentence of Section G.1.
ASH-23	G-4	1		I thought that we were working towards a watershed-type structure. This bulleted list makes it seem like we are not. I would prefer that language was added to actually open up the possibility that as watershed groups get more organized, a watershed approach could be used. This approach would be that watersheds identify the needs and are filtered up to the RAC and RWMG. I do not ever remember us (the RAC) agreeing that a watershed approach was not appropriate for a long-term structure. Maybe the wording just needs to be changed to make it more clear that for the short-term (i.e. this plan) a watershed structure was not appropriate, but that it is our goal for the long-term.	Page G-4 of the Plan will be revised to note that there are a number of challenges to organizing by watershed. As discussed later in Section G, the watershed-based approach could be developed and implemented at a later time if applicable parties think this approach is appropriate and workable.
ASH-24	-	-	-	Projects No. 26, 122 & 123 should be combined into one runoff reduction/water conservation project. Project No. 23 aims to prove that water conservation can also lead to pollution reduction. It takes a traditional water conservation program and adds a water quality monitoring program to measure efficiency and fully realize the multiple benefits of water conservation.	The RWMG will suggest to proponents that they consider grouping their projects.
ASH-25	J-5		Table J-2	Please recognize the Lagoon TMDL currently underway for 7seven lagoons in the region for bacteria, sediment, nutrients and TDS. Investigation Order 2006-076. RWQCB contact is Cynthia Gohram-Test (858)467-2957. This TMDL will shape water quality in the region for some time to come.	Table J-2 and the IRWM Plan text will be modified as suggested.
ASH-26			Appendix 13 Agua Hedionda Watershed Management Plan	Overview: The City of Vista in coordination with the Cities of San Marcos, Carlsbad, and Oceanside and the County of San Diego is implementing a Proposition 40 planning grant to develop a watershed plan a to protect and enhance the Agua Hedionda Watershed (AHW) and associated beneficial uses. This project is a key component to integrating the management of the watershed functions. This project is also consistent with the vision, goal, and objectives of the San Diego Regional Water Quality Control Board Basin Plan (Basin Plan), Carlsbad Watershed Management Plan (CWMP), and the Carlsbad Watershed Urban Runoff Management Plan (CWURMP). This project falls within the jurisdiction of the San Diego Regional Water Quality Control Board and is in the Carlsbad Hydrologic Unit (904.10) and the Agua Hedionda Watershed Area (904.3). Water bodies covered by this project include Agua Hedionda Creek, Buena Creek, Calavara Creek, and Agua Hedionda Lagoon.	The Agua Hedionda Watershed Management Plan will be added to Appendix 13 as suggested.
ASH-27			Appendix 13 Agua Hedionda Watershed Management Plan	Description: The Agua Hedionda Watershed faces substantial bank erosion problems in the upper watershed and excessive sedimentation in the lower watershed. These problems have led to 303(d) listings in both Agua Hedionda Creek and Lagoon for sedimentation. Other issues in the watershed are elevated bacteria levels, eutrophication and elevated pesticide levels. Trash is also a high priority within the watershed. The Agua Hedionda Watershed Management Plan (WMP) will address these issues through the following activities: 1. improve the health of the watershed by developing a watershed management plan to provide water quality, hydrology/drainage and biological information; 2. develop scopes of work and cost estimates for bioengineering projects to address the watershed impairment issues discussed within the management plan; 3. identify land areas within the watershed eligible for acquisition and restoration; 4. develop a watershed hydrologic model for sediment tracking; 5. conduct water quality analysis to determine overall watershed health; 6. acquire a Watershed Coordinator to oversee grant management and restoration activities within the watershed.	The Agua Hedionda Watershed Management Plan will be added to Appendix 13 as suggested.
ASH-28			Appendix 13 Agua Hedionda Watershed Management Plan	Goals: The goal of this project is to increase the health of the Agua Hedionda Watershed by addressing existing issues. The entire project is consistent with the goals and objectives of the overarching Carlsbad WMP and the Carlsbad WURMP.	The Agua Hedionda Watershed Management Plan will be added to Appendix 13 as suggested.

BAS-1			Ramona Grasslands project	<p>First, the above-referenced project only received credit for meeting 2 objectives, when it should have received credit for meeting for 6 objectives. The four missing objectives include:</p> <p>Effectively obtain, manage, and assess water resources data and information</p> <p>As part of the Ramona Grasslands project, hydrologic and hydraulic studies of the Santa Maria Creek studies were recently conducted. In addition, a riparian habitat and channel geomorphology assessment was also completed. The results from these studies and assessments as well as future analysis of the same will contribute towards this objective of the IRWM Plan.</p>	The project was not awarded credit for this objective because it does not include data management as a strategy.
BAS-2			Ramona Grasslands project	<p>Reduce Negative Effects on Waterways and Watershed Health Caused by Hydromodification and Flooding:</p> <p>As explained in greater detail in the application, purchasing and protecting targeted properties in the Ramona Grasslands would prevent additional impervious surfaces from occurring thereby preventing any increase in resulting storm water run-off and providing flood protection. In addition, part of the Ramona Grasslands project focuses on prescribed cattle grazing, including fencing the Santa Maria Creek to control grazing within the creek which will eventually result in the stream banks being restored and again providing flood protection. As an example of the flood protection benefits of the project, in 2004 the project received and used a flood protection grant to acquire a 230-acre parcel containing floodplain along the Santa Maria Creek. The above innovative approach for providing flood protection benefits (as opposed to structural remedies) and associated benefits were the reasons the grant was awarded.</p>	The project scoring, database, and appendices have been updated to reflect the comment.
BAS-3			Ramona Grasslands project	<p>Effectively Reduce Sources of Pollutants and Environmental Stressors:</p> <p>As explained in greater detail in the application, the alternative to purchasing and protecting properties in the Ramona Grasslands -- and then transferring these over to the San Diego County Parks Dept. of Parks and Recreation -- is to allow the properties to remain in private hands. As a result, the properties would eventually be developed. Housing and other building development is the single greatest contributor to environmental stressors in San Diego County, and a significant source of pollutants. This would reduce sources of pollutants and environmental stressors by assuring that they never get created in the first place. In addition, the project will utilize prescribed cattle grazing, thus keeping cattle out of the Santa Maria Creek and preventing overgrazing consequently resulting in a reduction of pollutants and environmental stressors. The project will also eradicate invasive, non-native plant species - another significant environmental stressor.</p>	The project scoring, database, and appendices have been updated to reflect the comment.
BAS-4			Ramona Grasslands project	<p>Optimize water-based recreational opportunities:</p> <p>Once the Ramona Grasslands project is complete, and the Preserve established, a river parkway trail along the creek will be opened to the public for hiking, biking, horseback riding, and bird watching recreational opportunities. TNC recently received a grant facilitating the acquisition of targeted properties for eventual trail development. San Diego Dept. of Parks and Recreation will own and manage the Preserve, including the Santa Maria Creek Greenway trail.</p> <p>In addition, the project is linked to several other projects, including the San Dieguito River Park (Creek) Coast to Crest Trail and Restoration Project. The northwestern boundary of the Ramona Grasslands project connects with the River Park. In addition, the Santa Maria Creek Greenway (river parkway) trail will eventually connect with the Coast to Crest Trail.</p> <p>Also, the project will protect ground and surface waters and provide recreation benefits to the unincorporated community of Ramona, which may be a disadvantaged community with one of the lower median family incomes in the county and not many recreational opportunities. The project may also address environmental justice concerns in</p>	The project scoring, database, and appendices have been updated to reflect the comment.
BAS-5			Ramona Grasslands project	<p>Also, concerning the project budget, I am decreasing the amount of grant funds requested to \$5,000,000. In addition, the match amount (federal cooperate endangered species fund \$'s) should be increased to \$20,000,000. Total project budget should now be \$25,000,000.</p>	The database and appendices have been updated to reflect the comment.
BAS-6			San Diego National Wildlife Refuge - Otay Unit Land & Crestridge	<p>First, the above-referenced project only received credit for meeting 2 objectives, when it should have received credit for meeting for 4 objectives. The two missing objectives include:</p> <p>Effectively Reduce Sources of Pollutants and Environmental Stressors:</p> <p>As explained in greater detail in the application, the alternative to purchase of the properties in question -- and then transfer over to the SDNWR -- is to allow the properties to remain in private hands. As a result, the properties would eventually be developed. Housing and other building development is the single greatest contributor to environmental stressors in San Diego County, and a significant source of pollutants. This would reduce sources of pollutants and environmental stressors by assuring that they never get created in the first place. Also, the properties are currently being used illegally for OHV use. This places an immense stress on the plants and native habitats in the area. It also affects air and water quality. Once TNC acquires and transfers properties over to the SDNWR, there will be staff assigned to the properties who will enforce land use that protects habitat. The off-road</p>	The project scoring, database, and appendices have been updated to reflect the comment.

BAS-7			San Diego National Wildlife Refuge - Otay Unit Land & Crestridge	Maximize Stakeholder / Community Involvement & Stewardship: Protecting and transferring properties over to the SDNWR opens up opportunities for increased monitoring and management from SDNWR staff, and increased participation from the community. An example is the Tijuana Estuary Visitor Center, which is a successful joint project between the SDNWR and the local community. The same concept can be applied once there is a viable SDNWR at Otay. Key to that objective is the land acquisition that makes Otay viable. Land acquisition is, of course, not a community activity; but the resulting inclusion of properties in the SD NWR is very much an enhancement of opportunities for the residents of San Diego County, Chula Vista and Alpine to be more involved with the conservation and the enjoyment of the natural habitats that surround them.	The project scoring, database, and appendices have been updated to reflect the comment.
BAS-8			San Diego National Wildlife Refuge - Otay Unit Land & Crestridge	In addition, the project was only given credit for 7 strategies, when it should have received credit for 12. This may have been due to the addendum for this project not being scored. I'm again attaching the addendum. In addition, below are the additional strategies for which the project should have received credit and the rationale for the same: Ecosystem Protection: As explained in greater detail the application/addendum, the Otay Unit of the San Diego NWR and the Crestridge linkage sit in the heart of the MSCP Preserve Area. Agencies developed the preserve area based upon the concept of connecting protected lands for the purpose of preserving ecosystems. The presence of large unprotected lands within the Refuge Boundary jeopardizes the contiguity that is necessary for ecosystem-wide protection. Acquisition of these properties will reduce the threat, place core lands into protection, and therefore help to protect the ecosystem.	The project scoring, database, and appendices have been updated to reflect the comment.
BAS-9			San Diego National Wildlife Refuge - Otay Unit Land & Crestridge	Environmental habitat protection and improvement: Right now, the lands are in private ownership and subject to extensive illegal use (mostly off-road vehicles). By acquiring the properties and placing them within the National Wildlife Refuge System, we can help to afford some of the highest level of environmental and habitat protection available to us. The NWR also has programs that could improve habitat on these properties once they are acquired and in public ownership.	The project scoring, database, and appendices have been updated to reflect the comment.
BAS-10			San Diego National Wildlife Refuge - Otay Unit Land & Crestridge	Water Quality Protection and Improvement: The Otay Unit of the SDNWR is directly adjacent to two reservoirs -- Otay and Sweetwater. The alternative to a acquisition and protection of these properties is development. Development would result in more concrete that would increase runoff problems and affect water quality. Alternatively, a wildlife refuge would involve no development, runoff would be decreased due to less damaging uses, and we could count on a result of higher water quality.	The project scoring, database, and appendices have been updated to reflect the comment.
BAS-11			San Diego National Wildlife Refuge - Otay Unit Land & Crestridge	Stakeholder and Community Involvement: The San Diego NWR has friends groups and other supporters who hike, bird watch, and relax in the wildlife refuge. The "Friends of the San Diego National Wildlife Refuges" is an association comprised of individuals and groups interested in the preservation and the protection of National Wildlife Refuges. In addition, many of the partners mentioned in the application are community members. Finally, the City of Chula Vista, and the County of San Diego have both been heavily involved in the protection of lands within the NWR and adjacent to it.	The project scoring, database, and appendices have been updated to reflect the comment.
BAS-12			San Diego National Wildlife Refuge - Otay Unit Land & Crestridge	Scientific and Technical Water Management Knowledge Assessment: The US Fish and Wildlife Service has an extensive monitoring program that can be applied to the refuge lands. Water table, and runoff studies may be a part of refuge management.	The project scoring, database, and appendices have been updated to reflect the comment.
BROWN-1	General	Project: Santee ...	General	Padre Dam Municipal Water District and Helix Water District respectfully request that the Committee reverse its decision to combine the Santee Water Reclamation Facility Expansion and the El Monte Valley Groundwater Recharge and River Restoration Projects. While the two projects are completely integrated, the feasibility of the projects is dependent on successful project management within two separate agencies with separate jurisdictions, elected Boards, ratepayers, budgets and politics. We have attached Appendix 7, Table 4 to show the benefits of the Santee Water Reclamation Facility Expansion Project when it is considered as a separate project.	The projects have been separated per the requests of Helix WD and Padre Dam MWD.
BROWN-2	6	Project: Santee ...	Appx 7, Table 1	Table 1 should be revised to include a row for the Santee Water Reclamation Facility Expansion Project, and in addition to the points awarded for Stakeholder/Community Involvement and Stewardship, Water Resources Data, Foundation for Water Management and Diverse Mix of Water Resources, points should be awarded and bullets added in the following boxes for the following reasons: Reliable Water Infrastructure System Padre Dam will construct, operate and maintain a 10MGD water recycling facility that will reduce the County's demand for imported water by 5,000AF and provide, after injection in the El Monte Valley Recharge Project, a drought-proof water supply for 10,000 households; Reduce Pollutants and Environmental Stressors project will recycle and reuse 10MGD of wastewater that would otherwise only be treated to the advanced primary level and discharged into the Pacific Ocean; Habitat and Open Space project will assure long term sustainability and restoration of 190 acres of habitat for 175 bird species, five fish species and other wildlife at Santee Lakes; Water-Based Recreation project will assure that fishing.	Project scoring has been revised to give credit for Objectives E, G and I. Because the project does not directly address habitat and open space, credit is not given for Objective H.

BROWN-3				boating, camping and recreation programs on and around the seven lakes at Santee Lakes remains available to San Diego County residents and visitors.	Project scoring has been revised to give credit for Objectives E, G and I. Because the project does not directly address habitat and open space, credit is not given for Objective H.
BROWN-4	12	Project: Santee ...	Appx 7, Table 2	Table 2 should be revised to include a row for the Santee Water Reclamation Facility Expansion Project, and bullets should be added and 11 points awarded because the project, and its linked project, the El Monte Valley Recharge Project, will be a demonstration model to study, improve upon, and repeat in all listed watersheds to provide San Diego County with a non-imported, drought-proof water supply.	Because the project creates a new source of water for the region it is given credit for benefitting all hydrologic units.
BROWN-5	25	Project: Santee ...	Appx 7, Table 3	Table 3 should be revised to include a row for the Santee Water Reclamation Facility Expansion Project and bullets should be added and points awarded in the following boxes for the following reasons: Economic Incentives Padre Dam discounts its recycled water rate by 10% to provide an economic incentive to large landscape and commercial customers to utilize this water conservation option; Urban Water Use Efficiency recycled water, along with water efficient landscaping and indoor water conservation, is a key strategy in San Diego County for urban water use efficiency.	Project scoring has been revised to give credit for the economic incentives strategy. Because the project does not reduce water usage, credit is not given for urban water use efficiency strategy.
BROWN-6	38	Project: Santee ...	Appx 7, Table 4	The Santee Water Reclamation Facility Expansion Project should score 100 points for Benefits Multiple Hydrologic Units, because the project, and its linked project, will be a demonstration model to study, improve upon, and repeat in all 11 listed watersheds to provide San Diego County with a non-imported, drought-proof water supply.	Agreed. The project has been re-evaluated and rescored.
BROWN-7	38	Project: Santee ...	Appx 7, Table 4	The Santee Water Reclamation Facility Expansion Project should score 100 points for Benefits Disadvantaged Communities because it will provide for the long term sustainability of Santee Lakes, a regional park and campground that provides disadvantaged communities within San Diego County and, specifically, residents who do not have the economic and transportation resources to travel outside of San Diego County, with \$4.00 entry to 190 acres of urban forest and 90 acres of lakes, fishing without purchasing an expensive state license or having your own equipment, hiking and running trails, playgrounds and access to hiking and mountain biking in Sycamore Canyon. Santee Lakes hosted over 500,000 visitors in 2006.	To receive credit for benefit to DAC, the project must clearly identify communities that are considered to be disadvantaged.
BROWN-8	38	Project: Santee ...	Appx 7, Table 4	The Santee Water Reclamation Facility Expansion Project should score 100 points for Linked to Other Projects or Programs because it is fully integrated and interdependent with the El Monte Valley Groundwater Recharge and River Restoration Project.	Agreed. The project has been re-evaluated and rescored.
BROWN-9	38	Project: Santee ...	Appx 7, Table 4	The Santee Water Reclamation Facility Expansion Project should score 100 points for Environmental Justice Benefits because it will provide for the long term sustainability of Santee Lakes, a regional park and campground that makes 190 acres of natural environment, seven lakes, fishing, camping, fully-accessible trails and playground, hiking and outdoor recreation accessible to all economically and physically disadvantaged residents within San Diego County.	To receive credit for EJ concerns, the project must identify specific communities and their EJ concerns.
BROWN-10	N/A	Project: Santee ...	Appx 7, Project Prioritization Scorecard	Santee Water Reclamation Facility Expansion Project - Criterion: Spans Multiple Hydrologic Units - Raw Score should be 100, Weighted Score should be 10, add "All" in Supporting Information for Hydro. Units.	Agreed. The project has been re-evaluated and rescored.
BROWN-11	N/A	Project: Santee ...	Appx 7, Project Prioritization Scorecard	Santee Water Reclamation Facility Expansion Project - Criterion: Linked to Other Projects - Raw Score should be 100, Weighted Score should be 10, add "El Monte Valley Groundwater Recharge and River Restoration Project" in Supporting Information for Linked Projects. Remove wording in "Justification for Modification to Scoring" column.	Agreed. The project has been re-evaluated and rescored.
BROWN-12	N/A	Project: Santee ...	Appx 7, Project Prioritization Scorecard	Santee Water Reclamation Facility Expansion Project - Criterion: Directly Benefits Disadvantaged Communities - Raw Score should be 100, Weighted Score should be 6. Santee Lakes provides \$4.00 entry to 190 acres of urban forest, lakes, fishing, hiking, playgrounds and access to Sycamore Canyon. Over 500,000 visitors in 2006.	To receive credit for EJ concerns, the project must identify specific communities and their EJ concerns.
BROWN-13	N/A	Project: Santee ...	Appx 7, Project Prioritization Scorecard	Santee Water Reclamation Facility Expansion Project - Criterion: Addresses Environmental Justice Concerns - Raw Score should be 100, Weighted Score should be 6. Santee Lakes is a regional park and campground that makes 190 acres of natural environment, seven lakes, fishing, camping, fully-accessible trails and playground, hiking and outdoor recreation accessible to all economically and physically disadvantaged residents within San Diego	To receive credit for EJ concerns, the project must identify specific communities and their EJ concerns.
BROWN-14	N/A	Project: Santee ...	Appx 7, Project Prioritization Scorecard	Santee Water Reclamation Facility Expansion Project - Total Weighted Score should be 100. Note this will need to be adjusted throughout the rest of the IRWM Plan.	Credit was not given for benefit to DAC and EJ as noted in the responses to items 6 and 8; thus, the total weighted score is 88.

BROWN-15	10-3	Project: Santee ...	Appx 10	Santee Water Reclamation Facility Expansion Project - the dates and cost information should reflect the information provided in the Application for the project. For Planning/Study, Start 12/1/05 and Finish 12/01/07. For Demonstration, Start NA and Finish NA. For Design, Start 12/1/07 and Finish 12/1/08. For Env. Doc. Permitting, Start 12/1/07 and Finish 05/1/08. For Construction, Start 04/1/09 and Finish 10/1/10. For Implementation is 2010. For Total Budget \$23,000,000. For Annual O&M \$2,330,000. For Grant Funding Requested \$5,000,000. For Matching Funding \$18,000,000. For Match Type "Padre Dam CIP and Federal Grant Funding." Note these dates and costs are for Phase 2 that applies to Prop. 50 funding (see Applications for Phase 3 for future funding opportunities).	No changes necessary for the schedule information. The budget information has been changed to match the figures in the comment.
BROWN-16	11-9	Project: Santee ...	Appx 11	Santee Water Reclamation Facility Expansion Project - the benefits information should reflect the information provided in the Application. This project and the linked El Monte Valley Recharge Project; "(1) Produce drought-proof water supply for 10,000 households; (2) 5,000 AF reduction in Water Authority imported water demand; (3) Over 80% achievement of the San Diego County Water Authority's 2020 goal for local groundwater production; (4) legacy 500-acre River Restoration Project including habitat, trails and recreation of 135 acres of river bottom/riparian habitat, and 169 acres of upland and woodland habitat along the San Diego River, 40 acres of restored lake features, and 8 acres of protected archeological sites; (5) utilize an underutilized groundwater basin in El Monte Valley; (6) reuse wastewater which decreases the overall waste discharges to the Pacific Ocean; (7) replaces a planned Golf Course Project with a River Restoration Project; (8) provides ability to utilize additional groundwater storage of 6,000 to 8,000 acre-feet for water supply and emergency storage use; (9) provides opportunities for habitat restoration identified in the MSCP/NCCP;	Appendix 11 will be modified to reflect the comments.
BROWN-17			(cont.)	(10) creates a positive working partnership among several agencies in the region; and (11) local well owners will be converted from well supply to potable water supply."	Appendix 11 will be modified to reflect the comments.
BROWN-18	12-3	Project: Santee ...	Appx 12	ADD separate row for Santee Water Reclamation Facility Expansion Project - Add check marks for all items except "Project Reduced Carbon Emissions".	Without justification for the additional statewide priorities, credit can only be given based on the original project application.
BROWN-19	General	Project: Santee ...	General	We would like an opportunity to review and comment on the input of the project "Santee Water Reclamation Facility Expansion Project" into the IRWM Plan since it was not included in the draft. Please let us know if your review and scoring differs from our comments.	Opportunity was provided.
BROWN-20	38	Project: Santee ...	Appendix 7, Table 4 and Appendix 7, Prioritization Scorecard	Please see attached text (ATTACHMENT A) demonstrating why raw score of 100 should be awarded for <i>Benefits Disadvantaged Communities</i> , and Revised Project Prioritization Scorecard.	Based on clarifying information, project has been rescored to give credit for DAC.
BROWN-21	38	Project: Santee ...	Appendix 7, Table 4 and Appendix 7, Prioritization Scorecard	Please see attached text (ATTACHMENT A) demonstrating why raw score of 100 should be awarded for <i>Environmental Justice</i> , and Revised Project Prioritization Scorecard.	Based on clarifying information, project has been rescored to give credit for EJ.
CIN-1	26		C	How does the RAC interface to achieve partnerships with NGO's? There was very little NGO involvement in the management & RAC. There are many NGO's with vested interests in this process that didn't even know it was going on. The entire process was unfortunately driven by San Diego, SDCWA and the County of SD and overseen by Dept. of Water Resources. These people typically underrepresent the interests of the natural environment over water supply increases, which always have further growth inducements and therefore great environmental impacts.	As noted on page A-14 and Section N-1 of the Draft IRWM Plan, the RAC was formed to provide subject matter expert input from representative environmental groups, academic entities, local business and agriculture, water suppliers, water agencies, and others. Representatives from NGOs and environmental organizations were included in the RAC (see Table N-2 on page N-4). While public announcements and stakeholder outreach activities engaged known stakeholders and encouraged participation at the RAC meetings, it is acknowledged that not all interested parties may have received notice of IRWM planning meetings. Short-term priority No. 3 (see Section G.3) presents an implementation plan to increase public awareness and involvement. NGO participation in the formation of a Regional IRWM structure (see Section G.2) is solicited and encouraged.
CIN-2	26		C	Fails to mention that a framework and political pressure are needed after good regulations are formed to convince local governments to adopt them. Just wishing that they do better planning won't make it happen. Too many local governments, i.e. San Marcos and Carlsbad (leaders in N. County Growth) are development driven. This impairs then from making balanced decisions on preservation & acquisitions.	The comment is noted and is assumed to relate to text on page C-7 of the Draft IRWM Plan. It should be noted that the Regional Board can and does require local agencies (through storm runoff regulations and point-source regulation) to develop and implement procedures and policies to implement Basin Plan water quality objectives.

CIN-3	7		C	needs to address the lack of local regulations to protect and preserve water resources. C-7 Mentions Regional coordinating with regulators, but this will fail to impact local government.	No change in the IRWM Plan is proposed. Objective C addresses the need to increase the scientific knowledge and understanding of water quality regulation and standards. Coordination between local agencies and the Regional Board is required to achieve this objective. The Basin Plan forms the basis of existing water quality regulation within the Region, and it is warranted to increase the scientific and technical knowledge of issues associated with Basin Plan standards.
CIN-4			Objective H	Mentions restoring & maintaining habitat and Open Space. FAILS to mention ACQUISITION or Conservation Easements two permanent solutions to protection of habitat and water quality. The best way to protect all species is to buy the land.	The first sentence of the description of Objective H (top of page C-15) states: "Manage and acquire land to preserve open space . . .".
CIN-5	8		C	Why is the year 2012 chosen in the goals on Open Space? With unrelenting pressure for residential, commercial and industrial growth this should be a top priority and stated "AS SOON AS POSSIBLE", certainly by 2010.	The year 2012 was chosen as being achievable RAC has not assigned priorities to the IRWM Plan objectives or goals.
CIN-6	21		C	Stream water flows are no longer seasonal as they once were. Most streams flow year round due to urban drainage (run-off). This has altered the characteristics of the plants and animals that live near, or down stream from them. Again this also needs to specifically state PURCHASE or Conservation Agreements to preserve land in it's natural state. This should be changed through-out the IRWMP.	No change in the IRWM Plan is proposed. Streamflows (see figures on page B-31) within the San Diego Region continue to be highly seasonal in nature. While streamflows in the Region remain highly seasonal, this is not to say that streamflows are zero during summer months. As documented in Table B-13 on page B-33, median summer streamflows of several cubic feet per second now occur in watercourses that prior to 1975 had a median summer flow of zero cubic feet per second. This increase in summer streamflow is attributed (see page B-32) to decreased groundwater use (leading to increased surfacing groundwater) and increased imported water use.
CIN-7	28		D	12/28 -Upgrades to treatment & conveyance in small water systems would enhance water quality & system reliability among regions with rural populations. Problem is, as stated above this would also open up the floodgates to development of the rural areas, as right now water & sometimes sewage capacity limits it.	The commenter's concern is noted, but the emphasis on the quoted statement is to enhance water quality and system reliability within rural water systems, not expand the capacity of these systems to serve additional development.
CIN-8			D	15/28 Recycled water (#16) misses the boat.....Not enough emphasis is on reuse of recycled water to the level that it can become potable again.	No change in the Draft IRWM Plan is proposed. The recycled water targets established in the Draft IRWM Plan are based on adopted Water Authority recycled water use targets that incorporate recycled water plans and projects adopted or proposed by the Region's recycled water agencies. Targets established in the Water Authority plans are reassessed each 5 years.
CIN-9			D	#21 & #22 There is now a complete and utter failure of local municipalities to address & limit run-off flows. This wasted water, (although not stated as usable in other water plans - which is why IRWMP should not have a requirement that goals have to be previously stated) could be cleaned up and reused. By controlling and reusing urban runoff the greatest gains in conservation and efficiency can be made.	The need to conserve water is in concert with Objective D (develop and maintain a diverse mix of water resources) and Objective G (reduce sources of pollutants and environmental stressors). It is recognized that more can be done in this area, and controlling and reusing urban runoff can be part of Water Management Strategy #21 (urban runoff management) and #22 (urban water use efficiency).
CIN-10			D	12/28 - Basis for selecting IRWM Plan strategies. 1. The strategy must be addressed within one of the regional existing plans - (This precludes innovative thinking) and should be deleted. The time has come to stop sorting based on projects and think in terms of bringing waters back into potable use. Desalination and recycling should not be separate issues. The desalination facility now being planned in CBD would be better referred to as a "potable water generation" facility. When the power plant goes to Cooling Towers the Poseidon desalination will not be able to meet it's outfall requirements for salinity. Instead of locking in previous thinking this plan should open innovation and cross-pollination of water ideas and sources. The Poseidon Plant could more economically convert secondary effluent to drinking water than using the impaired ocean as a source.	IRWM Plan regulations requires that the basis for selecting the strategies be identified. The Draft IRWM Plan requires strategies to (1) be addressed in an existing plan, and (2) help attain one or more Plan objectives. Strategies are general in nature, and each strategy provides for a wide variety of potential projects or solutions. The range of strategies addressed in Section D (which as shown in Table D-4 are addressed in local plans) allows for just about any type of water quality solution that addresses the Region's water needs. Because of the wide variety of available strategies (and even wider variety of potential projects or solutions associated with each strategy), requiring a strategy to be addressed in a local plan does not preclude innovative solutions.
CIN-11			D	23/28 Items 6 & 7 should be combined.	It is unknown what "23/28" and "Items 6&7" refer to. It is assumed that the commenter is proposing to combine strategy #6 (seawater desalination) and #7 (potable water treatment and distribution). The IRWM Plan follows convention of the State Water Plan, which identifies each as a separate strategy. The strategies are sufficiently different (and face significantly different implementation challenges) to warrant remaining separate strategies.

CIN-12	16		Table D-6	Recycled water should not continue to be put in separate, expensive conveyance systems. Through tertiary treatment and replacement in reservoirs it can be integrated back into potable uses. The public drinks treated sewage now from the CO river, it's time to educate them to that.	No change in the Draft IRWM Plan is proposed. The IRWM Plan does not preclude any agency from pursuing or studying indirect potable reuse, and interested agencies are free to submit any projects for inclusion in the Plan that proposed to study, develop, or implement such projects. The recycled water targets established in the Draft IRWM Plan are based on adopted Water Authority recycled water use targets that incorporate recycled water plans and projects adopted or proposed by the Region's recycled water agencies. Targets established in the Water Authority plans are reassessed each 5 years.
CIN-13	18		Table D-6	25/28 New Reservoirs - ridiculous - not efficient or practical forms of storage. Besides there are few places left to build them. This destroys habitat and cultural history.	The comment is noted, but increasing local surface storage (subject to conformance with applicable environmental regulations) does represent a means of increasing water supply reliability.
CIN-14	20		Table D-6	"Smart Growth" is a real misnomer and all references to SANDAG's term should be deleted and replaced with something more descriptive.....Like placing development next to underutilized transportation corridors. There is no such thing as Smart Growth. Take for instance the two sites SANDAG has identified in my city, The Buena Vista Valley and Ponto, neither are served by train and both are in critical environmental areas where it is not wise to overdevelop. SMART Growth has become an acronym for extra density - and should be deleted from the IRWMP.	A reference or explanation to the term "smart growth" will be added to Table D-6.
CIN-15	21		Table D-6	Urban Run-off - Make it a top priority (since it's extremely cost effective over creating new supplies and conveyance) to limit runoff. Eventually this needs to be tertiary treated, or put through reverse osmosis and put back into the potable system. This could easily be done by plumbing the run-off to the Poseidon plant.	The RAC has decided to not prioritize strategies or objectives within this Draft IRWM Plan. Prioritization of strategies or objectives may be considered in future versions of the plan, however. The RAC has established project prioritization criteria that, in part, fosters attainment of multiple Plan objectives.
CIN-16	22		Table D-6	Promoting native landscaping, over separate recycled water systems is the next paradigm shift that needs to occur at the local governmental level. It would have to be mandated for all new development, rather than paying for new sources of water.	The comment is noted. At this time, the RAC has decided not to prioritize IRWM Plan objectives or strategies.
CIN-17	25		Table D-6	Delete Smart Growth and conceptualize what it is you are trying to say here. As previously stated the term "smart Growth" is a vague SANDAG misnomer.	A reference or explanation to the term "smart growth" will be added to Table D-6.
CIN-18			E-1	10/22 in categorizing desalination..may be affected by "ecosystem restoration", don't see how that would be. But under desal these things should be checked: Ag water reuse, economic incentives, pollution prevention, recycled water, urban land use, run-off, water efficiency and transfers should all be checked because creating a new potable water source will de-emphasize conservation and reuse and induce growth - just no two ways about it.	Ecosystem restoration efforts may conflict with seawater desalination brine disposal needs, and may affect the nature and type of brine disposal sites or strategies considered as part of seawater desalination projects.
CIN-19			E-1	10/22 Ag water reuse, economic incentives, pollution prevention, recycled water, urban land use, run-off, water efficiency and transfers should all be checked because creating a new potable water source will de-emphasize conservation and reuse and induce growth - just no two ways about it.	The Draft IRWM Plan and the region's local water supply plans emphasize both diversity of water sources and conservation. Implementing one does not eliminate or reduce the need for the other.

CK-1	J-10	1	n/a	<p>Change from: The San Diego Coastkeeper also coordinates regionally focused citizen-monitoring efforts. This includes both observational monitoring (filling out a form providing a physical description of the waterway and mailing it or e-mailing it in) and water quality monitoring of water chemistry measurements. The San Diego Coastkeeper hosts the San Diego Citizen Watershed Monitoring Consortium to coordinate World Water Monitoring Day and coordinates citizen who are interested in getting involved with gathering data to improve and protect the surface waters of San Diego.</p> <p>Change to: The San Diego Coastkeeper Water Quality Monitoring program currently tests all San Diego County watersheds on a monthly basis by mobilizing and training members of the community. The goal of the monitoring activities is to develop a comprehensive assessment of surface water quality throughout the county for the purpose of (a) addressing non point source pollution; (b) establishing a baseline to protect unimpaired water bodies; and (c) identifying impaired water bodies and potential sources of impairment through regular monitoring. All monitoring t</p> <p>San Diego Coastkeeper also acts as the facilitator of the San Diego Citizen Watershed Monitoring Consortium, who</p> <ul style="list-style-type: none"> • Conduct community water monitoring activities throughout San Diego County • Organize World Water Monitoring day events in San Diego County and Tijuana • Share water quality data and educational information • Connect teachers and students around the globe through environmental data sharing 	Section J of the IRWM Plan will be modified as suggested.
CK-2	G-20		G-7	This timeline should be more aggressive. Our region has already built a foundation (outlined in Section J), and we need to develop a vision and system prior to 2010. Coastkeeper is already working to identify interested stakeholders, and we have a project partner that is willing to act as a repository for raw data. This need is so great in our region, and we need to move forward before ever party develops an intricate system of its own that will not integrate with others.	It is recognized that Coastkeeper has built a foundation for establishing regional web-based data management, but numerous additional data collection efforts must be incorporated and integrated to attain the short-term priority. Year 2010 appears to represent a reasonable schedule for the short-term priority, but efforts will be made to achieve the short-term priority in advance of this date.
CK-3	G-22		G-8	Also, we need to be more aggressive. Our basin plan is extremely outdated.	The RWMG agrees with the need for aggressive action, but addressing this short-term priority will require coordination and cooperation with the Regional Board. The proposed schedule appears appropriate unless or until Regional Board direction is received that a more aggressive approach and schedule is feasible.
COL-1	APP 7: 70	II. Scoring	Spans Multiple Hydr	With the additional partnerships and their educational aspects (see Items 2 & 3 below), Acquiring Willow Glen Farm will span the San Diego River and Pueblo Watersheds, in addition to the Sweetwater River Watershed.	Modification to project application has been accepted, and the project has been rescored to include multiple hydrologic units.
COL-2	APP 7: 70	II. Scoring	Disadvantaged Com	We have continued to develop and expand on the partnerships for the "Acquiring Willow Glen Farm" project. We will be partnering with San Diego Roots Sustainable Food Project's existing Terra Nova garden at Morse High School on Skyline Drive in Southeast San Diego to provide a farm site (Willow Glen Farm) for field trips for approximately 300 high school students a year from the Encanto/Southeast San Diego communities. According to Table B-8, the annual household income for families living in these two communities ranges from \$23,554 to \$34,349. We will be incorporating into the field trips, education regarding sustainable/organic farming practices and protection of the surrounding watershed and its wildlife. The Morse High School students involved in the Terra Nova garden are ethnically diverse, with a majority of students involved in the garden being Pacific Islander and Latino. The Terra Nova garden is a Small Learning Academy that emphasizes team-building, development of leadership skills, participation in community, and how the garden fits within the cycle of feeding the Hungry Tiger restaurant on campus, being financially sustainable, and composting kitchen waste. Students are learning about decr	Modification to project application has been accepted, and the project has been rescored to include credit for benefit to DAC.
	APP 7: 70	II. Scoring	Environmental Justic	We are discussing a potential partnership with San Diego Food Not Lawns and the San Diego International Rescue Committee to provide farm training and apprenticeship opportunities to refugees and recent immigrants to San Diego County as a form of education and job training. Many recent immigrants are from Southeast Asia and Eastern Africa. Teaching young people and recent immigrants how to farm organically and sustainably leads to cleaner and safer land use practices in our local communities, creates awareness and understanding, and helps to protect from pesticide and fertilizer runoff and illegal dumping. This education and training opportunity will also provide a means for people to grow fresh, healthy, local foods to support their families, protect their watershed and earn a living. We expect that many of the participants in this farmer training program would live within 10-20 miles of the farm (El Cajon and Southeast San Diego, both of which are classified as Disadvantaged Communities on Table B-8).	Modification to project application has been accepted, and the project has been rescored to include credit for EJ concerns.

COL-4	APP 7: 70	II. Scoring	Integrates Multiple S	<p>32—Explanation of stakeholders and involvement in the process: San Diego Natural History Museum is participating on the Willow Glen Farm committee to develop the program and intends to develop field trips and classes for Museum members around the local, sustainable farming issue and its role in protecting the environment; County of San Diego is participating in the Willow Glen Farm committee and interested in expanding its “Green Machine” environmental education unit to include the Willow Glen Farm in the process; People’s Organic Food Co Op is also participating in the Willow Glen Farm committee and is helping to conduct education and outreach to raise awareness about the farm and its role in protecting and enhancing the environment and our local food supply.</p>	<p>Based upon the clarifying information, the San Diego Region - Four Reservoir Intertie Project Feasibility Study has been credited with the stakeholder/community involvement strategy.</p>
FRANZ-1				<p>Attached is the slightly revised and slightly expanded upon IRWM Project Application: San Diego Regional Water Quality Assessment and Outreach Project</p>	<p>Changes to the San Diego Regional Water Quality Assessment and Outreach Project (overall rewrite, including description, WMS, budget, schedule, etc.) have been accepted and the project database has been revised to reflect the changes</p>
GIB-1			North County Invasi	<p>Under address multiple objectives the scoring does not reflect benefits of the project. Only 2 objectives were checked, four of the six should have been selected. Section 5 of the application addresses these issues (Conveyance, Floodplain management, and pollution prevention). The first unchecked objective is ‘Reduce negative effects on waterways and watershed health caused by hydromod and flooding’. This is achieved by treating Arundo, pampas and tamarisk which reduce flow capacity by there physical presence. Reduced channel capacity and debris from Arundo during floods causes damming on bridges triggering additional over bank flows. Invasives, particularly Arundo also trap sediment over time raising the bed of the flow channel. This drastically reduces flow capacity of the channel causing much more frequent flooding.</p>	<p>The project scoring, database, and appendices have been updated to reflect the comment.</p>
GIB-2			North County Invasi	<p>Effec+E351tively reduce sources of pollution and env stressors: Under pollution prevention direct nps pollution from homeless camps is discussed as well as direct impacts E359from the stands themselves: sedimentation, water temp, and organic inputs.</p>	<p>The project scoring, database, and appendices have been updated to reflect the comment.</p>
HAZ-1	J-8	All	Academic and Research Institutions	<p>This section should include the work completed through the La Jolla Shores Coastal Watershed Management Plan: The Coastal Observing Research and Development Center (CORDC) at Scripps Institution of Oceanography (SIO) participated in the La Jolla Shores Coastal Watershed Management Plan as the lead for Information Management within the ASBS. The team at SIO implemented an end-to-end information management system for the regulatory data collected within the ASBS. This system consisted of automated data transfer and ingestion, data archiving and backup, public display of data and historical data download. SIO first modified the SWAMP templates to fit the suite of variables collected for the SIO NPDES permit. For a given data type, the templates contain full relationships and input fields. Completed templates are emailed and automatically ingested into the backend database. The backend database was also leveraged from the SWAMP system. The MS Access system was reprogrammed in a LINUX based MySQL database. Ingestion was automated through programmed parsing scripts. The scripts read template files, stripped out values and loaded them into the appropriate tables within the backend. The goal of the ASBS information management system is to establish the infrastructure needs and generate a concep</p>	<p>The information will be incorporated into Section J as suggested.</p>

	J-8	2	Academic and Research Institutions	<p>SCCOOS was established by a consortium of research organizations that extends from Northern Baja California in Mexico to Morro Bay at the southern edge of central California, and aims to streamline, coordinate, and further develop individual institutional efforts by creating an integrated, multidisciplinary coastal observatory in the Bight of Southern California to provide data and information primarily for the benefit of society.</p> <p>SCCOOS aims to integrate a broad suite of observations to include but not limited to: surface currents, satellite imagery, wave conditions and forecasts, meteorological conditions and forecasts, water quality, ocean temperature, salinity, chlorophyll, and density in the form of products and raw data. The SCCOOS data management team has developed a number of innovative data interfaces and products, leveraging google maps to provide localized, zoomable, and navigable interactive display of data. This effort allows scientists, decision makers, and the public access to products that will provide a scientific basis for research, management, and improved uses of the ocean environment.</p> <p>SCCOOS aggregates much more than just automated shore stations within the Southern California Bight. SCCOOS</p>	The information will be incorporated into Section J as suggested.
HAZ-3	J-26	Reference		Include the Coastal Observing Research and Development Center (CORDC) ASBS Information Management: http://cordc.ucsd.edu/projects/asbs	The information will be incorporated into Section J as suggested.
HAZ-4	J-26	Reference		Include the Southern California Coastal Ocean Observing System (SCCOOS): www.sccoos.org	The information will be incorporated into Section J as suggested.
HEN-1		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy #4 - By using the captured storm water for irrigation, ground water from the Valley Well, currently used for irrigation, would be reduced.	Based upon the clarifying information, the Capture and Reuse Storm Water Runoff from Visitor Parking Lot project has been credited with the conjunctive use strategy.
HEN-2		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy # 26 - Capture of the storm water would include sedimentation to remove particulate. This would improve the water quality and the availability is improved by using the water for irrigation.	Based upon the clarifying information, the Capture and Reuse Storm Water Runoff from Visitor Parking Lot project has been credited with the water quality protection and improvement strategy.
HEN-3		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy # 28 - The storm water runoff from the visitor's parking lots could be captured and used for irrigation. Irrigation water is currently supplied partially from the Valley Well. This groundwater supply could be decreased by coordinating with this groundwater capture	Based upon the clarifying information, the Capture and Reuse Storm Water Runoff from Visitor Parking Lot project has been credited with the conjunctive use strategy.
HEN-4		Spans Multiple Hydrologic Units	Section II - Scoring	The Wild Animal Park serves more than 1.5 million guests annually. These guests come to us from all over San Diego County. The Park is committed to educating all of our guests about the importance of water conservation and will display engaging educational signs about the project for the public to view.	Modification to the project description has been accepted, and the project has been rescored to include all hydrologic units
HEN-5		Linked to Other Projects	Section II - Scoring	The Capture and Reuse Storm Water Runoff project is linked to the following projects within the IRWMP: Wastewater Treatment Upgrade project, East and West Riparian Corridor projects, and the Recycled Storage Facility project.	The project has been rescored to include credit for linkages to other projects
HEN-6		Identified in Existing Plan	Section II - Scoring	The Capture and Reuse Storm Water Runoff from Visitor Parking Lot project is identified in the Wild Animal Park's Water Master Plan. We have also spoken with staff at the City of San Diego Water Department who are actively involved in developing the San Pasqual Basin Management Plan. We have their support for our projects and anticipate their inclusion in the final Plan.	The Project Prioritization Scorecard has been updated to include the Basin Management Plan.
HEN-7		Address EJ Concerns	Section II - Scoring	This project will also include free admission and/or programs for students from Title 1 schools in San Diego County to the Wild Animal Park. It also offers educational water conservation programs to low-income families. We will also provide free educational programs to local tribal communities.	No change to the scoring. To receive credit for EJ concerns, the project should clearly identify the impacts and benefits resulting from implementation of the capture and reuse of stormwater specifically.
HEN-8		Addresses Multiple Objectives	Section II - Scoring	The East Riparian Corridor project will also address Objectives F and H as the water will move through the hillside more consistently and will not flood off-grounds. The project will also create new wetlands and habitat will be restored.	The Project Prioritization Scorecard has been revised to include credit for Objectives F and H.
HEN-9		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy # 15 - The water that will re-circulate through the East corridor is partially supplied from the waste water treatment plant. This water is currently treated to a secondary level and is used to fill the East Pond and irrigate the entire corridor. Another project, Tertiary Treatment Wastewater Upgrade, will provide the canyon with water treated to a tertiary level. Either way, treated wastewater is being re-used.	Based upon the clarifying information, the East Riparian Corridor project has been credited with the recycled water strategy.

HEN-10		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy # 24 - Many years of little rain and increased animal densities have helped diminish the extent of wetland ecosystems at the Wild Animal Park. By increasing water flow and providing constructed wetlands, the East Corridor project will preserve and enhance the wetlands ecosystem for not only collection animals but also birds, amphibians, plants and essential insects and microorganisms.	Based upon the clarifying information, the East Riparian Corridor project has been credited with the ecosystem restoration strategy.
HEN-11		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy # 28 - The East Pond, which is the low point of the entire East Corridor, is supplied with a combination of ground water from the Valley Well, treated wastewater used for irrigation and surface water. This project would coordinate all of these supplies so as to improve the current water quality in the corridor and use less ground water from the Valley Well.	Based upon the clarifying information, the East Riparian Corridor project has been credited with the conjunctive use strategy.
HEN-12		Spans Multiple Hydrologic Units	Section II - Scoring	The Wild Animal Park serves more than 1.5 million guests annually. These guests come to us from all over San Diego County. The Park is committed to educating all of our guests about the importance of water conservation and will display engaging educational signs about the project for our public to view.	Modification to the project description has been accepted, and the project has been rescored to include all hydrologic units
HEN-13		Creates New Water	Section II - Scoring	The East Riparian Corridor project creates new water because the wetlands will treat the water and improve water quality enough to use for irrigation and reuse through the corridor.	No change to the scoring. This is not considered to be the creation of new water.
HEN-14		Identified in Existing Plan	Section II - Scoring	The East Riparian Corridor project is identified in the Wild Animal Park's Water Master Plan. We have also spoken with staff at the City of San Diego Water Department who are actively involved in developing the San Pasqual Basin Management Plan. We have their support for our projects and anticipate their inclusion in the final Plan.	The Project Prioritization Scorecard has been updated to include the Basin Management Plan.
HEN-15		Address EJ Concerns	Section II - Scoring	This project will also include free admission and/or programs for students from Title 1 schools in San Diego County to the Wild Animal Park. It also offers educational water conservation programs to low-income families. We will also provide free educational programs to local tribal communities.	No change to the scoring. To receive credit for EJ concerns, the project should clearly identify the impacts and benefits resulting from implementation of the riparian treatment system specifically.
HEN-16		Addresses Multiple Objectives	Section II - Scoring	The Educational Demonstration Wetland project also addresses Objectives F and H, because the water levels will be controlled to reduce flood off-grounds, and new wetlands will be created and habitat restored.	The Project Prioritization Scorecard has been revised and rescored to include credit for Objectives F and H.
HEN-17		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy # 24 - Many years of little rain and increased animal densities have helped diminish the extent of wetland ecosystems at the Wild Animal Park. By increasing water flow and providing constructed wetlands, the East Corridor project will preserve and enhance the wetlands ecosystem for not only collection animals but also birds, amphibians, plants and essential insects and microorganisms.	Based upon the clarifying information, the Educational Demonstration Wetland project has been credited with the ecosystem restoration strategy.
HEN-18		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy #28 - The East Pond, which is the low point of the entire East Corridor, and the South Africa Pond, the low point for the Africa Corridor, is supplied with a combination of ground water from the Valley Well and surface water. This project would coordinate all of these supplies so as to improve the current water quality in both corridors, inhibit overflow off grounds, flood control and use less ground water from the Valley Well.	Based upon the clarifying information, the Educational Demonstration Wetland project has been credited with the conjunctive use strategy.
HEN-19		Spans Multiple Hydrologic Units	Section II - Scoring	The Wild Animal Park serves more than 1.5 million guests annually. These guests come to us from all over San Diego County. The Park is committed to educating all of our guests about the importance of water conservation and will display engaging educational signs about the project for the public to view.	Modification to the project description has been accepted, and the project has been rescored to include all hydrologic units.
HEN-20		Creates New Water	Section II - Scoring	The Educational Demonstration Wetland project creates new water because the wetlands will treat the water and improve water quality enough to use for irrigation and reuse through the corridor.	No change to the scoring. This is not considered to be the creation of new water.
HEN-21		Linked to Other Projects	Section II - Scoring	The Educational Demonstration Wetland project is linked to the East and West Riparian Corridor projects within the IRWMP.	The project has been rescored to include credit for linkages to other projects.
HEN-22		Identified in Existing Plan	Section II - Scoring	The Educational Demonstration Wetland project is identified in the Wild Animal Park's Water Master Plan. We have also spoken with staff at the City of San Diego Water Department who are actively involved in developing the San Pasqual Basin Management Plan. We have their support for our projects and anticipate their inclusion in the final Plan.	The Project Prioritization Scorecard has been updated to include the Basin Management Plan.
HEN-23		Address EJ Concerns	Section II - Scoring	This project will also include free admission and/or programs for students from Title 1 schools in San Diego County to the Wild Animal Park. It also offers educational water conservation programs to low-income families. We will also provide free educational programs to local tribal communities.	The project has been rescored to include credit for EJ concerns.
HEN-24		Addresses Multiple Objectives	Section II - Scoring	The Recycled Water and Groundwater Storage Facility project also addresses Objectives E and F, because piping infrastructure will be installed and will contribute to system reliability. The water will be stored and ultimately reduce flooding off-grounds.	The Project Prioritization Scorecard has been revised to include credit for Objectives E. Because the project does not directly address hydromodification, credit is not given from Objective F.

HEN-25		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy #7 - Will provide irrigation water when groundwater or recycled water pumping system is being maintained or non-operational. This enhances the reliability of the distribution system.	No change.
HEN-26		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy #20 - Because of increased reliability (filling the tank during wet months), the project would significantly reduce the amount of water supplied during summer months.	No change.
HEN-27		Integrates Multiple Strategies	Section II - Scoring	Regarding strategy #26 - The tank would hold both water from the Valley Well and from the wastewater treatment plant. Therefore, the water would be more available at all times and particularly more reliable during dry seasons. It would also allow the blending of different sources for better water quality management.	Based upon the clarifying information, the Recycled Water and Groundwater Storage Facility Project has been credited with the water quality protection and improvement strategy.
HEN-28		Spans Multiple Hydrologic Units	Section II - Scoring	The Wild Animal Park serves more than 1.5 million guests annually. These guests come to us from all over San Diego County. The Park is committed to educating all of our guests about the importance of water conservation and will display engaging educational signs about the project for our public to view.	Modification to the project description has been accepted, and the project has been rescored to include all hydrologic units
HEN-29		Creates New Water	Section II - Scoring	This project will create new opportunities to blend water therefore increasing water quality and allowing for more extensive use throughout the Park.	No change to the scoring. This is not considered to be the creation of new water.
HEN-30		Linked to Other Projects	Section II - Scoring	The Recycled Water and Groundwater Storage Facility project is linked to the following projects within the IRWMP: Educational Demonstration Wetland project and the East and West Riparian Corridor projects.	The project has been rescored to include credit for linkages to other projects.
HEN-31		Identified in Existing Plan	Section II - Scoring	The Recycled Water and Groundwater Storage Facility project is identified in the Wild Animal Park's Water Master Plan. We have also spoken with staff at the City of San Diego Water Department who are actively involved in developing the San Pasqual Basin Management Plan. We have their support for our projects and anticipate their inclusion in the final Plan.	The Project Prioritization Scorecard has been updated to include the Basin Management Plan.
HEN-32		Address EJ Concerns	Section II - Scoring	This project will also include free admission and/or programs for students from Title 1 schools in San Diego County to the Wild Animal Park. It also offers educational water conservation programs to low-income families. We will also provide free educational programs to local tribal communities.	No change to the scoring. To receive credit for EJ concerns, the project should clearly identify the impacts and benefits resulting from implementation of the riparian treatment system specifically.
HEN-33		Addresses Multiple Objectives	Section II - Scoring	The Tertiary Wastewater Treatment Upgrade also addresses Objectives B and D, because the water will be monitored throughout process and managed to provide optimal water quality. Resources will be diversified because increased water quality allows for more extensive use throughout the Park.	The Project Prioritization Scorecard has been revised to include credit for Objective D Because the project does not include the strategy of water resources data collection, management and assessment, credit is not given for Objective B.
HEN-34		Spans Multiple Hydrologic Units	Section II - Scoring	The Wild Animal Park serves more than 1.5 million guests annually. These guests come to us from all over San Diego County. The Park is committed to educating all of our guests about the importance of water conservation and will display engaging educational signs about the project for our public to view.	Modification to the project description has been accepted, and the project has been rescored to include all hydrologic units
HEN-35		Linked to Other Projects	Section II - Scoring	The Tertiary Wastewater Treatment Upgrade project is linked to the following projects within the IRWMP: Educational Demonstration Wetland project and East and West Riparian Corridor projects.	The project has been rescored to include credit for linkages to other projects
HEN-36		Identified in Existing Plan	Section II - Scoring	The Tertiary Wastewater Treatment Upgrade project is identified in the Wild Animal Park's Water Master Plan. We have also spoken with staff at the City of San Diego Water Department who are actively involved in developing the San Pasqual Basin Management Plan. We have their support for our projects and anticipate their inclusion in the final Plan.	The Project Prioritization Scorecard has been updated to include the Basin Management Plan.
HEN-37		Addresses EJ Concerns	Section II - Scoring	This project will also include free admission and/or programs for students from Title 1 schools in San Diego County to the Wild Animal Park. It also offers educational water conservation programs to low-income families. We will also provide free educational programs to local tribal communities.	No change to the scoring. To receive credit for EJ concerns, the project should clearly identify the impacts and benefits resulting from implementation of the wastewater treatment upgrade specifically.
HEN-38		Addresses Multiple Objectives	Section II - Scoring	The Valley Well Improvement project also addresses Objective H because more consistent water flow through the hillside will help restore and maintain wetlands and habitat.	The Project Prioritization Scorecard has been revised to include credit for Objective H.

HEN-39		Spans Multiple Hydrologic Units	Section II - Scoring	The Wild Animal Park serves more than 1.5 million guests annually. These guests come to us from all over San Diego County. The Park is committed to educating all of our guests about the importance of water conservation and will display engaging educational signs about the project for our public to view.	Modification to the project description has been accepted, and the project has been rescored to include all hydrologic units
HEN-40		Identified in Existing Plan	Section II - Scoring	The Valley Well Improvement project is identified in the Wild Animal Park's Water Master Plan. We have also spoken with staff at the City of San Diego Water Department who are actively involved in developing the San Pasqual Basin Management Plan. We have their support for our projects and anticipate their inclusion in the final Plan.	The Project Prioritization Scorecard has been updated to include the Basin Management Plan.
HEN-41		Address EJ Concerns	Section II - Scoring	This project will also include free admission and/or programs for students from Title 1 schools in San Diego County to the Wild Animal Park. It also offers educational water conservation programs to low-income families. We will also provide free educational programs to local tribal communities.	No change to the scoring. To receive credit for EJ concerns, the project should clearly identify the impacts and benefits resulting from implementation of the well improvements specifically.
HEN-42		Addresses Multiple Objectives	Section II - Scoring	The West Riparian Corridor project will also address Objectives F and H as the water will move through the hillside more consistently and will not flood off-grounds. The project will also create new wetlands and habitat will be restored.	The Project Prioritization Scorecard has been revised to include credit for Objectives F and H.
HEN-43		Spans Multiple Hydrologic Units	Section II - Scoring	The Wild Animal Park serves more than 1.5 million guests annually. These guests come to us from all over San Diego County. The Park is committed to educating all of our guests about the importance of water conservation and will display engaging educational signs about the project for our public to view.	Modification to the project description has been accepted, and the project has been rescored to include all hydrologic units
HEN-44		Creates New Water	Section II - Scoring	The West Riparian Corridor project creates new water because the wetlands will treat the water and improve water quality enough to use for irrigation and reuse through the corridor.	No change to the scoring. This is not considered to be the creation of new water.
HEN-45		Identified in Existing Plan	Section II - Scoring	The West Riparian Corridor project is identified in the Wild Animal Park's Water Master Plan. We have also spoken with staff at the City of San Diego Water Department who are actively involved in developing the San Pasqual Basin Management Plan. We have their support for our projects and anticipate their inclusion in the final Plan.	The Project Prioritization Scorecard has been updated to include the Basin Management Plan.
HEN-46		Address EJ Concerns	Section II - Scoring	This project will also include free admission and/or programs for students from Title 1 schools in San Diego County to the Wild Animal Park. It also offers educational water conservation programs to low-income families. We will also provide free educational programs to local tribal communities.	No change to the scoring. To receive credit for EJ concerns, the project should clearly identify the impacts and benefits resulting from implementation of the riparian corridor treatment specifically.
HEN-47		Spans Multiple Hydrologic Units	Section II - Scoring	The Wild Animal Park serves more than 1.5 million guests annually. These guests come to us from all over San Diego County. The Park is committed to educating all of our guests about the importance of water conservation and will display engaging educational signs about the project for our public to view.	Modification to the project description has been accepted, and the project has been rescored to include all hydrologic units
HEN-48		Identified in Existing Plan	Section II - Scoring	This project is identified in the Zoological Society's Water Supply and Stormwater Sewage Master Plan.	No change is proposed. These plans cited are not considered watershed plans.
HEN-49		Directly Benefits Disadvantaged Communities	Section II - Scoring	The Zoo's Water Department offers free educational water quality and conservation programs to thousands of underserved students throughout San Diego County. We also offer free admission to all San Diego County schools and provide free admission to all children throughout the month of October.	Modification to the project description has been accepted, and the project has been rescored to include benefit to DAC.
HEN-50		Address EJ Concerns	Section II - Scoring	This project will also include free admission and/or programs for students from Title 1 schools in San Diego County to the Zoo. It also offers educational water conservation programs to low-income families.	No change to the scoring. To receive credit for EJ concerns, the project should clearly identify the impacts and benefits resulting from implementation of the modification of stormflow specifically.
HUT-1			El Capitan Reservoir Watershed Acquisition Program	Comments regarding Appendix 7 Page 98, the Scorecard for the El Capitan Reservoir Watershed Acquisition Program. We are providing additional information to clarify and assist with the scoring of this project. 1) Addressing Multiple Objectives. Additional objectives include H – Protect, Restore and Maintain Habitat and Open Space and I- Optimize Water-Based Recreational Opportunities. As this project is for the acquisition of open space adjacent and near to our largest reservoir, El Capitan, substantial acreage of open space will be protected. These lands will be available for appropriate recreational activities.	The project scoring, database, and appendices have been updated to reflect the comment.
HUT-2			El Capitan Reservoir Watershed Acquisition Program	2) Involves more than one entity: The project is included in the San Diego Coalition's annual work plan. The Coalition is a watershed-based association of more than 60 organizations. Therefore, this group has endorsed and supports this project.	Comment noted. The Coalition is considered a stakeholder for the project rather than a partner for the project. No change to the project scoring.

HUT-3			El Capitan Reservoir Watershed Acquisition Program	3) Identified in Existing Plan. Section 4.7 of the San Diego River Watershed Management Plan Action Recommendations calls for "seek opportunities for joint acquisitions, restoration and management of lands where a program value is recognized." This acquisition program would implement this recommendation.	Comment noted. No change to the project scoring.
HUT-4			El Capitan Reservoir Watershed Acquisition Program	4) Direct Benefits to Disadvantaged Communities: These properties would be available to education and recreation programs serving these communities. SDRPF in partnership with Aquatic Adventures operates the 3 day Headwaters to Ocean Watershed Camp. A significant number of these campers come from disadvantaged communities. The Eagle Peak Preserve acquisition, as an example, is available for youth-based day-use and camping, with a primary target of disadvantaged communities. These properties will also be part of the 52 mile-long San Diego River Park and provide recreational and educational opportunities. 7 disadvantaged communities are identified in the IRWM plan within the San Diego River Watershed.	The project scoring, database, and appendices have been updated to reflect the comment.
HUT-5			San Diego River Watershed Coordinator	Comments regarding Appendix 7, page 188, the Scorecard for the San Diego River Watershed Coordinator. We are providing additional information to clarify and assist with the scoring of this project. 1. This project meets additional plan strategies by advancing the coordination of information, project planning, project funding and implementation. These additional strategies include wetland enhancement and creation, water quality protection and improvement, ecosystem preservation, recreation and public access, urban runoff management, regional surface storage, recharge areas protection, floodplain management, and ecosystem restoration. The San Diego River Watershed has both surface reservoirs and substantial groundwater areas. The advancement of projects identified within the San Diego River Watershed Management Plan and other plans will be multi-benefit and provide an integrated approach coordinated through the WUMP workgroup, the San Diego River Coalition and the forum identified in the San Diego River Watershed Management Plan.	Without supporting information, the appropriateness of these additional strategies can not be assessed and credit can not be awarded.
HUT-6			San Diego River Watershed Coordinator	2. Linked to other specific projects. The Watershed Coordinator will work to advance projects in a coordinated manner including the existing Eagle Peak Preserve acquisition, current habitat restoration planning, the San Diego River Restoration Projects, advancement of the San Diego River Trail including the Upper San Diego River Gorge Trail which is currently in construction and many other specific projects.	The project scoring, database, and appendices have been updated to reflect the comment.
HUT-7			San Diego River Watershed Coordinator	3. This project is identified in the San Diego River Watershed Management Plan on page 59 and elsewhere where it indicates the first step of the plan is to prioritize the actions through inter-agency coordination and cooperation and the establishment of a broad-based watershed forum. This is a specific activity of the proposed project. The watershed coordinator will provide the function of bringing together the WUMP workgroup, the San Diego River Coalition, San Diego River Park Foundation, San Diego River Conservancy and other interested parties such as the water agencies. The San Diego River Park Foundation has taken a leadership role in this effort. The Watershed Coordinator will also have the responsibility of identifying long-term funding strategies for ongoing coordination activities.	The project scoring, database, and appendices have been updated to reflect the comment.
JDANA-1				Attached is the Santa Fe Irrigation District Recycled Water System Improvement project. We have revised the project to include San Elijo Joint Powers as a partner. We added sejpa by combining our projects, increased the stakeholder list, increased the cost to reflect a 40% grant/60% agency by in, and sejpa becomes a partner. Recycled Water System Improvement project resubmitted, changes included title, description, WMS, budget, schedule, etc.	Changes to the San Diego Regional Water Quality Assessment and Outreach Project have been accepted with the exception of the following water management strategies: Agricultural Land Stewardship - While the description addresses improved water quality delivered to agricultural users, it does not address the quality of water from agricultural lands or stewardship practices within agricultural lands. Agricultural Water Use Efficiency - Although the project converts potable water use to recycled water use, it does not reduce the amount of water used. Potable Water Treatment and Distribution- The project reduces demand for potable water, but it does not involve improvements to the potable supply through additional treatment or distribution improvements. Floodplain Management - The connection to floodplain management is not clearly stated. Groundwater Aquifer Remediation - The project does not remove pollutants from the aquifer.
JMEG-1	A-14			I disagree that disadvantaged communities were represented on the RAC. Coastkeeper represents the Bay Council, which deals with issues of EJ, but they aren't actually representatives of a disadvantaged community. I have mentioned this in the past and provided names of people to contact who would better represent these communities and issues. Please contact me to discuss.	The text on page A-14 will be changed to note that disadvantaged communities are included within jurisdictions of several RAC agencies, and disadvantaged community needs are addressed by several non-government organizations within the RAC. It should be noted that the Draft IRWM Plan proposes additional disadvantage community outreach as part of Short Term Priority #3 (see Table G-6 on page G-17).
JMEG-2	B-28			Add: Groundwork San Diego- Chollas Creek and the SCWRP San Diego Task Force	Text on page B-28 will be modified as suggested.
JMEG-3	B-33			Agua Hedionda Creek/Lagoon also in CHU	Text on page B-33 will be modified as suggested.

JMEG-4			Table B-19	Why is "shallow bay" a vegetation community?	No change planned. As noted in Table B-19, shallow bays may support some scattered emergent wetlands vegetation.
JMEG-5	B-51			Estuarine habitats include coastal lagoons, seagrass beds, southern coastal salt marsh, and brackish marsh. Submerged habitats also include seagrass beds.	Text on page B-51 will be modified as suggested.
JMEG-6	B-52			Eradication of <i>Caulerpa taxifolia</i> has been declared official.	Text on page B-52 will be modified as suggested.
JMEG-7	C-4		Table C-1	I believe the underserved communities need to be "emphasized", not "included".	No change is planned. Underserved communities will be included in the plan, and components of the proposed outreach (see Table G-6) will target disadvantaged communities, but the IRWM Plan outreach and education is not directed toward emphasizing the needs of one segment of the Region's population over another.
JMEG-8	C-15		Objective H	Add: restore habitats that promote healthy water quality and protect sensitive habitats.	No change is planned to the wording of Objective H, but text within the Objective H section will be revised to incorporate the comment.
JMEG-9			Table C-10	Objective E should be an objective of Goal #3. Natural infrastructure should be considered a vital component of the water infrastructure system.	As stated on page C-10, the focus of Objective E is to meet the requirements of Goal 1. Infrastructure referred to in Objective E refers to water conveyance, treatment, storage, and distribution facilities to meet the demands for treated and untreated water. Natural watercourses can be used for local water conveyance (e.g. Sweetwater River between Loveland and Sweetwater Reservoirs), but the emphasis on Objective E is maintenance of physical facilities. Natural watercourses are more appropriately addressed as part of Objective F (hydromodification/flooding).
JMEG-10	D-11			Within #9: What is "land-forming?". Add the word "restoration after "wetlands conservation and creation..." Instead of "improving flow hydraulics", we want to "restore and protect natural hydrology". The Army Corps believed that they were "improving" flow by channelizing our streams and rivers. Why was San Dieguito emphasized?	Text on page D-11 will be modified to address the comment.
JMEG-11	D-11			Within #10: Natural floodplain management must be a major component of floodplain management. See the Ventura IRWMP for good language. I'm not sure if any flood control districts do this within the County, but non-profits and local governments improve floodplain management when they preserve and restore natural habitats and open space within the floodplain.	Text on page D-11 will be modified to note that natural floodplain management is a means of flood protection.
JMEG-12	D-21		Table D-6	I don't think interpretive centers belong in ecosystem restoration.	No change is planned, as public education may be a key element of promoting and sustaining ecosystem restoration. The State of California has encouraged inclusion of interpretive centers or their equivalent in public education and awareness programs.
JMEG-13	E-4		Objective E	Wetland and other habitat protection is part of protecting a natural conveyance system.	No change is planned. As noted in the text, virtually all of the strategies can be linked to each other. The objective of the integration exercise in Section E, however, is to identify key linked primary and secondary strategies associated with attaining the listed objective. Wetlands and habitat protection are not as directly linked maintaining a reliable water infrastructure system as the strategies identified in the Draft IRWM Plan. Protecting natural watercourses is more appropriately linked with strategy groups for Objective F (e.g. floodplain management #10), and Objectives H & I (ecosystem restoration #9).
JMEG-14	E-5		Objective F	Protecting wetland habitat is part of natural floodplain management.	Protecting wetlands habitat will be added as a secondary strategy to Objective F (and in Table D-5).
JMEG-15	F-9			The two criteria for placing a project in Tier 2 seem incongruous with one another. These two criteria seem like they should place a project in difference categories.	The comment is noted. The Tier 2 criteria were developed with RAC input and approval after consideration and discussion of alternatives.
JMEG-16	F-9			Does Tier 2 mean that a projects needs help but could reapply at a later time?	Tier 2 means that, using the criteria established for IRWM planning, the project did not go far enough to achieving the Region's objectives. The project will still be included for future consideration. It is important to note that these projects have not been dropped from the Plan.
JMEG-17	M-10			There is a bit of confusion here because the SCWRP region is the Southern California Bight (Pt Conception in Santa Barbara to the border with Mexico). A total of 17 projects are on the SCWRP Work Plan in SD County. There are a total of 72 projects on our Work Plan throughout our region. The 17 projects in SD County have been placed on the Work Plan because of their regional importance. This demonstrates a true regional integration.	Text on page M-10 will be modified to reflect the comments.

JMEG-18	N-7			SCWRP is not currently part of EHC's SD Bay Campaign, although we are supportive of their efforts. I don't think the SCWRP has helped the RAC address disadvantaged communities. And I think Coastkeeper only does peripherally. I think we need representatives from the disadvantaged communities to represent themselves.	The text on page N-7 will be modified to reflect the comments, and the importance of the IRWM Plan short-term priority action plans (see Tables G-5 and G-6) will be noted.
JMEG-19	O-3			Another state agency to consider is the Coastal Conservancy, which provides funding for coastal restoration, protection, and access.	The Coastal Conservancy will be added to the list of other state agencies.
KIM-1	B-14			Global Climate Change Issues. Energy demand should be added as an issue. Energy demands are expected to increase and need to be offset by energy conservation and efficiency measures. Because water is the largest energy user in California, the Plan must address this issue.	The text on page B-14 will be modified to reflect the comment.
KIM-2	B-38			Final TMDL bacteria for beaches and creeks has been prepared (June 25, 2007) and awaits adoption.	The text on page B-38 will be modified to reflect the comment.
KIM-3	B-51			Description of the Region, Aquatic, Estuarine, and Marine Habitat. The Plan should include (1) the results of the SDRWQCB biological assessment monitoring program for fresh water streams: http://www.waterboards.ca.gov/sandiego/programs/bioassessment.html and http://www.waterboards.ca.gov/sandiego/programs/bioassess/Biological%20Assessment%20and%20Biocriteria.pdf . The results show poor habitats using the metric Index of Biological Integrity (IBI). Add a table listing the water body and its IBI. (2) San Diego Bay Advisory Committee for Ecological Assessment Report: http://www.porofsandiego.org/sandiego_environment/documents/SB68/SB_68_Final_Report_2-24-6.pdf	The general characterization of the Region's habitat will be modified to note the referenced studies. It should be noted that the objective of the text on page B-51 is to provide a general description of environmental resources. While it would be possible to enumerate a number of issues and list IBI data for a number of water bodies in the Region, the general description within the Draft IRWM Plan appears adequate to meet the IRWM Plan guidelines for describing the Region. It should also be noted that significant variation in IBI values have been reported during the past 10 years, and differences in opinion exists as to what the data signify.
KIM-4	B-52			Invasive Species Add exotic species in San Diego Harbor listed in the report: http://www.dfg.ca.gov/ospr/organizational/scientific/exotic/OSPR%20Report%20again.pdf	The referenced studies will be noted, but the objective of the text on page B-52 is to provide a general description of environmental resources. While it would be possible to enumerate a number of issues and invasive species associated with each water body within the Region, the general description within the Draft IRWM Plan appears adequate to meet the IRWM Plan guidelines for describing the Region.
KIM-5	B-63			The statement that local agencies use regional outfalls to discharge unused recycled water is not correct at least for the City of San Diego's two water reclamation plants, the North City and South Bay. Each are capable of treating wastewater to secondary and tertiary levels. Tertiary treatment is used only to supply the contracted recycled water demand and the remaining wastewater flow is treated to secondary and discharged into their respective outfalls; the South Bay and Pt. Loma outfall. Therefore, these reclamation plants do not discharge unused recycled water into their outfalls. The City of San Diego Water Reuse Study recognized the seasonal demand of non-potable recycled water and recommended that to make optimum use of the recycling capacity of these plants, they should provide both non-potable and indirect potable recycled water. The report is available on line at: http://www.sandiego.gov/water/waterreusstudy/involvement/fd2006.shtml	Text on page B-63 is correct as stated, but to avoid misinterpretation or confusion, the text will be revised to state: "Local agencies may utilize either storage facilities or regional ocean outfall facilities to handle excess recycled water or wastewater flows during periods of inclement weather or limited demand."
KIM-6	C-2			Emergency response plans for natural disasters such as severe droughts and earthquakes, should be included as an objective in the Plan.	No changes are proposed. The Plan objectives were developed by the RWMG with input from the RAC and public. RAC approval will be required to add additional objectives. Future updates of the IRWM Plan will be coordinated with applicable emergency planning organizations to incorporate proposed water-related emergency response plans and actions.
KIM-7	C-9		C-4	We do not agree that the seawater desalination should be included in the Plan because conservation and alternative sources of water can meet the prescribed supply shown for seawater desalination. These alternatives are listed in the comments for page C-9 below. Furthermore, the environmental impacts to the marine ecosystems and high energy demands of seawater desalination as proposed in the Carlsbad project are not acceptable. See a critique of seawater desalination in the report: Cooley, Heather, Peter Gleick and Gary Wolf "Desalination with a Grain of Salt, A California Perspective", Pacific Institute http://www.pacinst.org/reports/desalination/index.htm	No change is proposed. Seawater desalination is currently contained within the Water Authority water supply plans and plans developed by several member agencies. Including seawater desalination in the IRWM Plan recognizes this fact. The inclusion of seawater desalination in the Plan does not obviate the need for any seawater desalination project within the Region to conform with CEQA, NPDES, and other applicable environmental regulations.
KIM-8	C-9		C-4	The water savings targets shown should be increased by 8% by 2030. Increased use of native and drought tolerant plants and reducing high water demanding turfs can meet this goal. Increase water recycling by adding indirect potable reuse to provide 16,000 AFY as shown on page 6-7 in the Water Reuse Study cited above.	No change is proposed. The listed conservation and targets are established within current adopted Water Authority plans. The Water Authority plans incorporate and encompass water savings targets established within member agency plans that are based on specific projects and programs. Water Authority's water savings targets are updated at least every five years, and updated conservation targets will be incorporated into future iterations of the IRWM Plan.

KIM-9	C-14			Objective G. The Plan should address emerging contaminants of concern including endocrine disrupting compounds in the imported water supplies and in the effluents from local wastewater treatment plants. This objective also lacks specific actions for source control. There is a real need to improve hazardous waste management including public outreach and more household hazardous waste collection centers that are conveniently accessible for public use	Objective G is an objective, not a action plan. The general wording of the objective (which does not target specific contaminants, but all "pollutants") is appropriate. Short-term priority #5 addresses the scientific/technical basis foundation of beneficial uses, and can address any emerging pollutants of concern.
KIM-10	D-8			Agricultural Land Stewardship. The RWQCB should be included in the list of agencies to assist and aid in agricultural land stewardship. Water Quality provisions for wastewater discharges from agricultural activities are conditionally waived by the RWQCB Basin Plan. The conditional waivers include requirements that the discharger must comply with in order to qualify for the waiver. The Board has released for public comment a new set of conditional waivers for 11 classes of discharge operations to amend the Basin Plan. There are three classes of agricultural discharges: from animal operations, from agricultural and nursery operations and from silvicultural operations. The intent is to improve the water quality of the conditionally waived discharges. The Board plans to use a phased approach to implement the agricultural conditional waivers, in part due to the fact that small farms comprise the majority of agricultural operations many of which are unfamiliar with the water quality requirements. The first phase will focus on an educational outreach with the final objective to enroll all agricultural activities under the conditional waiver. See the details of the conditional waivers at: http://www.waterboards.ca.gov/sandiego	The text on page D-8 will be modified to reflect Regional Board regulation of agricultural operations.
KIM-11	D-13			Recycled water. As noted above, the San Diego Water Reuse Study has shown that the North City and South Bay Water Reclamation plants can supply 16,000 AFY of drinking water by indirect potable reuse of municipal wastewater. The environmental impacts of indirect potable reuse are significantly less than potable water derived by seawater desalination as proposed by the Carlsbad desalination project. The Orange County Water District treats wastewater to drinking water standards and uses it to replenish their groundwater resource. The groundwater replenishment program consists of two phases, the first is to provide 70,000 AFY and the second phase 140,000 AFY. The first phase is scheduled for completion in November 2007. The Districts efforts clearly demonstrates that indirect potable reuse of highly treated municipal wastewater is a viable water source and should be included in the regional water management plan. Orange County groundwater project details see: http://www.gwrssystem.com/about/pdf/0705GWRS_progress_rpt.pdf	No changes are proposed. Recycled water and groundwater supply development targets included in the Draft IRWM Plan are consistent with adopted Water Authority plans and plans implemented by the Region's water/recycled water agencies. These plans include the use of recycled water for groundwater recharge. Targets will be updated at least every five years.
KIM-12	E-13			The Plan should be proactive to reduce discharge of known endocrine disrupting compounds into the waste stream, liquid and solid waste. Integrated pest management should be added	The comment is noted. Page E-13 identifies general strategies (per Section D) that can reduce pollutant loads and stressors, and does not identify specific water quality constituents targeted for disruption.
KIM-13	H-10		H-2	The impacts in Table H-2 for desalination omits the impingement and entrainment losses to marine life. The fact that EPA has officially suspended the Phase II rule on CWA Section 316(b) for once-through -cooling supports the fact that seawater intakes such as that used at the Encina power plant and planned to be used as the feedwater source for the desalination project are harmful to marine life. Information on 316(b) is available on line at : http://www.epa.gov/waterscience/316b/	Impingement and entrainment will be added to the potential long-term impacts for seawater desalination.
KIM-14	M-1			The Coastal Commission is notably absent and should be added as it oversees consistency with local coastal programs, permitting agency for seawater desalination, protection of coastal resources, etc.	Text will be added to Section M to note the role of the Coastal Commission.
KIM-15	O-3			Coordination. CalTrans should be added because it is involved in land use, air and water quality impacts of surface transportation modes. Coastal Commission , State Lands Commission should be added as they are the agency overseeing lands held in public trust	Caltrans will be added to the list of state agencies.
LEW-1			Santa Margarita Conjointive Use Project	When our original application for the Santa Margarita Conjointive Use Project was submitted there was some confusion as to how to answer some of the questions. Additionally, I believe the review committee interpreted our project as only a water resource development project. It is much more than that. Our proposed project will not only develop a new source of water through a conjunctive use project, distribution facilities will be built to be able to deliver that water both to Fallbrook PUD and other SDCWA agencies during surplus winter periods (a new local water supply benefits all the basins in the region because then more imported water is available for everyone else), the TDS levels in the lower Santa Margarita basin will decrease over time as a result of the projects membrane treatment process, nearly 1400 acres of habitat along the river will be protected and maintained and recycled water will be used as a saltwater intrusion barrier as a result of the project. Therefore, several changes are recommended both on the application submitted and in the scoring. I have attached a revised application and addendum reflecting	The revised application has been received and will be included in the revised IRWM Plan.

LEW-2			Santa Margarita Conjointive Use Project	I would also offer the following comments regarding scoring: Objectives: 1 believe the SMCUP 1) develops and maintains a diverse mix of water resources by developing a new local supply; 2)qualifies for constructing and operating and maintaining a reliable water infrastructure system by construction of a treatment plant, a seawater intrusion barrier, a transmission pipeline capable of delivering water to Camp Pen, Fallbrook PUD and all other SDCWA agencies; 3)Effectively reduces sources of pollutants and environmental stressors by using membrane treatment thereby reducing TDS in the lower basin over time; 4) Protect, restore and maintain habitat by setting aside 1380 acres of river habitat as part of the project.	The project scoring, database, and appendices have been updated to reflect the comment.
LEW-3			Santa Margarita Conjointive Use Project	Hydrologic Units: Our project benefits ALL hydrologic units by developing a new supply of local water. New local water development benefits the entire SDCWA region by freeing up imported water supplies to meet other needs.	The project scoring, database, and appendices have been updated to reflect the comment.
LEW-4			Santa Margarita Conjointive Use Project	Water Management Strategies Addressed: In addition to the 8 management strategies noted in the draft report, the project also addresses the following strategies: 1) groundwater aquifer remediation- by providing membrane treatment, the project will over time reduce the TDS level in the lower SMR basin, also see seawater intrusion barrier next, 2) Matching water quality to use- the project proposes to use recycled water to create a seawater intrusion barrier thereby protecting groundwater quality and leaving higher quality water available for higher use, 3) Recycled water- see 2 above. 4) Urban runoff management- wet weather flows in the river will, to the maximum extent possible, be recharged through the project facilities to supplement groundwater supplies. 5) Water transfers- during the winter months, the project will transfer excess water produced to the SDCWA aqueduct system for delivery to all other SDCWA members.	All but water transfer accepted. Water transfers refer to inter-regional transfers. Scoring, database and appendices updated.
MM-1			Recycled Water Retrofit Assistance Program	1. Under page 21, Water Management Strategies, Economic Incentives should be noted. This program is designed to provide water agencies with economic incentives to assist their end-users in retrofitting their facilities to accept recycled water.	The project scoring, database, and appendices have been updated to reflect the comment.
MM-2			Recycled Water Retrofit Assistance Program	2. Under page 36, "Generates New Water" should be noted as 100. Per the public meeting discussion at the zoo, if water distribution expansion projects scored 100 such as Olivenhain MWD's Non-potable Water Distribution Project which brings recycled water to customers, so too, should the retrofitting of these end-users sites also garner similar scores. Retrofitting these sites offsets a potable water need.	The project scoring, database, and appendices have been updated to reflect the comment.
NYG-1	C-4	various		The general public should not be the only target of education program. Another key target is elected officials who need better understanding of the inter-relationships- and that the idea is to have a balanced approach. Need to add targets that get to other stakeholders.	No change is proposed. The proposed public outreach program encompasses representatives from municipalities and other public agencies.
NYG-2	C-6	Obj 4		It states the focus is Goal 4, but it should also be Goal # 3. A key concern is that the NCCP's do not really address water issues, and prior water quality programs did not look at land. This integrated water management plan, to be successful, needs to really integrate both.	The text under Objective 4 will be modified to reflect the comment.
NYG-3	C-7	Rationale		Need to add to the bullet list something like: improve coordination of habitat conservation and water quality programs/regulations/permits.	The text will be modified to incorporate the suggested information.
NYG-4	C-8		Table C-3	Need some better interim measures that don't require waiting until 2015 to see if there is any impact. Could identify 2-3 key areas for research and put completion date of those studies as the target.	Interim measures and proposed completion dates will be identified and included in Table C-3 to assess progress toward achieving the objective.
NYG-5	C-9	# 1	Table C-4	Water conservation targets are not set high enough. Plus it is essential that there is some kind of a tiered approach so that conservation actions/incentive step up in a planned way in response to changes in supply. The recent response to shortfall in supply to protect a species of fish was a classic example of what not to do- for weeks the papers quote regional water staff saying- there is no need to conserve- we'll let you know if there is. Then after several weeks they say- oh now we really should be conserving. We should always conserve- and it needs to be clear what additional conservation needs to be practiced, both in response to temporary conditions like the shut-off to protect fish, and the long term need to have a sustainable supply sufficient for a reasonable level of population.	No change is proposed, as the existing targets are consistent with local plans. Water conservation targets presented in the IRWM Plan represent targets adopted by the Water Authority and its member agencies for the Region. These targets are updated at least every five years.
NYG-6	C-9	#3	Table C-4	Recycled water target is also way too low. This should be restated in terms of percentage of use that is to be recycled water for several key uses- for example- 100% of landscaping using recycled water. Also there needs to be a target to better establish recycled water supply - in many areas there is not the infrastructure in place and that is the key first step.	No change is proposed, as the existing targets are consistent with local plans. Recycled water targets presented in the IRWM Plan represent targets adopted by the Water Authority based on member agency plans and facilities. These targets are updated at least every five years.
NYG-7	C-9		Table C-4	Add a better way to assess the limits of growth and supply. Currently local cities allow all proposed growth as long as there is a "plan" for assuring water supply. A "plan" is a pile of paper. There needs to be a limit to growth that considers the limits of supply, funding and construction of supply infrastructure- not just a plan.	No change is proposed. Water demands are based on achievable conservation goals and approved SANDAG population projections.

NYG-8	C-14	Obj G		My concern is that all of this discussion seems to focus on new development. There is a huge problem with existing, especially older development where we have discharge pipes going directly to creeks with no filtering or velocity/volume control. Also- it is not just lakes and reservoirs that need to be targeted- but all of our local creeks as well that are the key source of pollutants on our lagoons and coastal waters.	The comment is noted. Comprehensive source control management strategies are part of the storm runoff control, and source control from existing infrastructure/land uses are also included.
NYG-9	C-14	#5	Table C-7	The item is written too narrow- it is not just "sewer overflows" but all kinds of system failures and vandalism. There needs to be a more comprehensive approach that assesses the risk of sewer system component failures and has a corrective action plan in place.	No change is proposed. SSOs are defined to include overflows, failures and vandalism.
NYG-10	C-14		Table C-7	Add a measure that addresses homeless encampments- a known primary source of pollutants that still has no comprehensive plan in place.	Homeless encampments are acknowledged as a contributor to water quality problems within the Region, but appear to be only one of many issues that adversely impact water quality. Projects that addressed water quality improvement (including dealing with homeless camps) were encouraged and solicited as part of IRWM Plan development. Several of the submitted projects include measures that identify and deal with homeless camps. Future project solicitation opportunities will exist for interested organizations to submit projects that address water quality impacts related to homeless camps.
NYG-11	C-15	Rationale		The rationale is not strong enough, or complete enough. San Diego is one of the world's top 25 biological "hot spots." It has more threatened and endangered species than any other comparable size land mass in the continental US. A critical shortcoming is that not all of the county has an approved regional NCCP, and most of the local cities do not have approved sub-area plans. Addressing this is the first step toward having an integrated approach.	The comment is noted, but the rationale listed in the IRWM Plan appears sufficiently strong to justify inclusion of Objective H.
NYG-12	C-16	# 1-5	Table C-8	The values are all based on local plans- many of which do not yet exist. The state has established low and moderate income housing targets for each region, that then get translated by SANDAG into a city target. Key conservation targets should be developed the same way- give each city a target- let them come up with a plan to meet it. And since these targets need to address water as well as land impacts- they need to be higher than the minimums included in the approved NCCCP's. The targets cannot be based on approved plans-unless there is a mandate for such plans- and for the plans to include targets for each of the measures. (The only local plan approved in north county does not have targets defined this way so there would be no way to even determine if this has been met.)	The comment is noted. The IRWM Plan is intended to be an umbrella document that includes water-related aspects of local water supply, habitat protection, flood protection, conservation, water quality protection, and other plans. Numerical values for the Table C-8 targets had not been assessed by the RWMG and RAC at the time of the Draft IRWM Plan, and values were left blank with notation that the targets would be selected to be "consistent with local plans". The RWMG and RAC will develop and insert numerical targets within the revised IRWM Plan that will help promote attainment of Objective H. The targets may represent interim or minimum values that are consistent with known local or sub-regional plans (e.g. County of San Diego plans). It is recognized that it will be necessary to revisit these targets in future iterations of the IRWM Plan to reflect improved information or more specific targets established in the plans of other local agencies or organizations.
NYG-13	C-16		Table C-8	Add a specific target for each city and the county to have an adopted sub-area plan by 2008 that includes targets for each of the items in the IRWMP.	Specific targets for each city can be considered as part of future plan updates, but input from municipalities will be required as part of the process to develop or evaluate such targets.
NYG-14	C-16		Table C-8	A critical problem is that even for the plans that have been adopted there is no clear definition of what constitutes a "functional riparian habitat" let alone buffers.	The comment is noted, and can be addressed as part of technical/scientific work groups (see Table G-8 on page G-22).
NYG-15	C-16			We first need a clear standard for what constitutes healthy riparian corridors and buffers, measure what we have and then set a target for more.	The comment is noted. The targets set forth in Table C-8 represent reasonable means of achieving Objective H. Development of a "clear standard" for what constitutes healthy riparian buffers would be subjective and achieving a subjective consensus may be difficult. For the interim, it makes sense to work towards the assigned targets in parallel with addressing scientific/technical bases (as addressed in Table G-8 on page G-22).
NYG-16	C-16		Table C-8	Wildlife corridors are called out as a key element of this objective, but there is not one measure that assesses this- and there needs to be. A key problem is that the regional wildlife corridor is just a general concept, it has not even been mapped in detail- and it has not been ground truthed. There needs to be an on-the-ground assessment of the primary regional wildlife movement corridors, barriers identified, and then a plan to correct them. A measure could be the number of miles of the regional corridor that have been validated and that are functional.	The IRWM Plan is an umbrella document that is intended to incorporate water-related needs and measures developed within the Region's habitat and wildlife protection plans and other water-related plans. While Objective H acknowledges the importance of wildlife corridors, the RWMG and RAC in this IRWM Plan iteration did not have sufficient information on which to develop a target related to wildlife corridors. As regional and sub-regional plans develop additional corridor mapping, "ground truthing", and information on wildlife corridors within the Region, information from these plans will be incorporated into future iterations of the IRWM Plan and applicable wildlife corridor targets will be established.

NYG-17	C-17		Table C-9	Establishing target numbers here does not seem consistent with the note on the previous page that says the goal is to "optimize". How do you know these are the optimum numbers? Furthermore achieving the number- but having it in a damaging location would technically meet the target. This needs to be re-worked so it is clear that protecting the resources is the first priority.	Within Objective I, the term "optimize" was selected by the RWMG and RAC to indicate that recreational opportunities need to be balanced against competing needs. As noted in the description for Objective I, the objective is to "protect and improve" recreational uses "while ensuring that recreational activities do not adversely affect other beneficial uses of water". Target numbers established by the RWMG and RAC were selected on the basis of improving recreational opportunities while balancing these opportunities against water quality and water supply protection needs.
NYG-18	D-10	#6		Target numbers are not consistent with note on prior page - how do you know the target numbers are "optimum"- might be too high. There is no basis for pre-determining the optimum number.	Within Objective I, the term "optimize" was selected by the RWMG and RAC to indicate that recreational opportunities need to be balanced against competing needs. As noted in the description for Objective I, the objective is to "protect and improve" recreational uses "while ensuring that recreational activities do not adversely affect other beneficial uses of water". Target numbers established by the RWMG and RAC were selected on the basis of improving recreational opportunities while balancing these opportunities against water quality and water supply protection needs.
NYG-19	D-16	Basis		It is unclear why it is required that an item must be in one or more existing plans-this assumes that all of the existing plans fully address the needed elements- seems like if they did we wouldn't have the problems that we do. The issue is if the plan requires an item to a sufficient standard that assures coordination/quality- not just that it is in the plan. Furthermore the plans were each developed from a narrower focus- i.e. a special water interest. By design that narrow interest was ranked highest- and the other elements included in the integrated approach are often not even considered. Real integration would require evaluating what is in each of the plans and making sure there are no conflicts with the integrated plan. It would also require relooking at the plans to make sure there aren't items that have been overlooked.	No change is proposed. The strategies listed in Section D are general, and virtually all (see Table D-4 on page D-17) have been addressed in local or regional plans. It makes sense to proceed with such general strategies that have been vetted and addressed in local plans.
NYG-20	D-20		D-6	Were these items all part of the information provided at the time project applications were requested? It really seems like this is an after the fact cataloging of items- rather than soliciting projects that would meet key objectives i.e. those things that have not been adequately addressed in the existing plans.	Information in Table D-6 was developed by the RWMG technical staff early in the IRWM planning process to identify the potential range of projects/programs that could be considered in the plan. This information was not distributed as part of the project application packets, and was not used to prioritize, categorize, or integrate proposed projects.
NYG-21	D-25			There is a second desal plant in Oceanside	The Oceanside plant is not a seawater desal plant, but is a groundwater demineralization facility (see Table B-24 on page B-60).
NYG-22	B-17		Table B-6	A key factor is the amount of protected natural lands- not just "undevelopable" The land needs to be managed to assure that the resources are protected. This number should increase over time.	No change is proposed. Land use values are from the cited SANDAG report. Values for "protected" lands are not listed and are not available.
NYG-23	B-49			There are also vernal pools in the CHU- Poinsettia in Carlsbad plus others	Carlsbad HU will be added to the list of HUs with vernal pools.
NYG-24	B-51			Need a description of the wildlife corridor in north and east County. Regional corridors are not functional unless they are linked- existing plans have not assured that and the need for improvement should be called out.	No change is planned. The intent of the section is not to identify all corridors in the County but to note that they exist and are important. Examples were cited from the MSCP to reinforce this point.
NYG-25	B-51	3		North and East county rated one sentence- and it seems throughout that they are an afterthought. If there is any intent for this plan to address the entire county then this needs to be expanded to actually include the rest of the county.	No change is planned. The intent of the section is not to identify all corridors in the County but to note that they exist and are important. Examples were cited from the MSCP to reinforce this point.
NYG-26	B-52	invasive species		Should also acknowledge the major eradication program in the CHU- and its current status.	Text will be modified to note that eradication programs are ongoing within the Region.
NYG-27	F-2			Sect C identifies measurable targets, but I didn't find any list of short term priorities. If you don't define what is most important short term then you are really saying all of these items are equally important- so whatever gets submitted becomes the priority. Funds cannot cover everything that is needed so it is very important to determine what really is most important in the short term- and focus project funding in those areas. Until those priorities are established you can't really prioritize the projects	No change is proposed. The RAC decided to not prioritize Plan objectives, so it is not possible to prioritize short-term priorities.

NYG-28	entire			<p>I really think the process is flawed. You should get stakeholder buy-off- which must include public comment, on the goals and objectives. If there are problems there then everything that follows has the same problems. 2 should define short term priorities 3 get buy in on a ranking system and short term priorities. 4 only then should you solicit projects and rank them. You have prepared the entire plan and now you go out and ask for input. - clearly you really intend to just deal with minor corrections as you really have spent your resources and have a plan you find acceptable. I don't know what the issues are in the rest of SD County- but I live in coastal north county and look at a \$ 735m expenditure- and see two projects for my area. And one of them benefits a private for profit company and doesn't even belong on the list. I understand that integrated planning is more complex. Please do not think that you deal with that complexity by setting up a group made up primarily of all of the same persons whose plans did not really address the big picture, and who did not integrate planning, and then write 40 matrices showing potential</p>	<p>The comments are noted. Efforts have been made to identify the full suite of projects being considered throughout the region. The entire process, including development of goals and objectives, was conducted through a series of stakeholder meetings and monthly or more frequent meetings with the Regional Advisory Committee (RAC), all of which are open to the public and noticed accordingly. Public comment is accepted at every meeting. In addition, public workshops were held to receive feedback on the goals and objectives and other aspects of the process specifically. These meetings were held on 8/28/06, 8/29/06, and 8/30/06 (refer to Section N for a complete list of stakeholder and public meetings conducted to solicit input on these topics). The current public comment period is intended to provide time for the public to review the completed draft plan, which is the product of input received at previously held public and stakeholder meetings. The RWMG and RAC intend to address as many comments as possible, given external time constraints and the requirement that the Plan be adopted by the end of the year. Complexity in this process was</p>
NYG-29	F-5	updates		<p>This makes it clear that "public" workshops were really just providing information for project applicants to refine the projects they had already submitted in April to make them more consistent with the Plan(which had not yet gone out to the public) There was no opportunity to submit new projects- or to refine projects submitted in the first round in December. This is not a public input process- it is a process for persons who have submitted project applications to make their project and the regional lists of projects more competitive. That has nothing to do with best achieving the broad goals of the plan. The refinement should have consisted of reviewing preliminary submittals against a list of identified priority needs- then determining if there were shortfalls- and soliciting project submittals to fill that gaps. I believe there are huge gaps- but the process you have laid out provides absolutely no opportunity to address them.</p>	<p>An opportunity to submit new projects occurred in April. A public meeting was held on April 25, 2007 to coincide with this project submission opportunity, during which the project application forms were reviewed in detail and the public were given the opportunity to ask questions and/or comment on the process and information being requested. Once the Public Draft IRWMP was released, applicants had an opportunity to review how their projects were evaluated and provide comments and refine projects. An additional, two-part public workshop was held on June 29, 2007. The first part of the workshop focused on introducing the elements of the Plan to the public, and the second part of the workshop focused on assisting project proponents in understanding the scoring system that was applied to their projects and ways in which they should comment on their project scoring to more accurately reflect the merits of their projects. The call for projects was absolutely open - the goal was to identify as many projects being considered throughout the region as possible. The public as well as stakeholders were solicited</p>

NYG-30	F-8		Table F-1	<p>Since this is the most important of these 700 pages of text- this needs to be done right. The best test of a complicated scoring system is to take a few projects and just apply the common sense test. Does a project that would make a significant contribution toward achieving plan objectives rank higher than one that makes a minor contribution or is poorly linked? If you do paired comparisons of projects does the better project end up with more points than a poor project? In my opinion, the proposed project scoring system fails the common sense test. I believe it needs significant re-working- through a thoughtful, interactive discussion process. I believe this scoring system should be a basis for public workshops- and until you get this right you shouldn't take this process any further. Just a few comments to highlight some of the concerns : no rationale for why meeting 4 of 9 objectives (44%) 8 of 33 strategies (24%) and 11 of 11 hydrologic units (100%) all receive 100% of the points for their respective criterion; identified in existing plan is "yes" or "no"- but there are often qualitative differences between what is in the plan and the optimum way to carry an item out (i.e.- what is in the plan needs to be improved on)- for</p>	<p>The top 50th percentile of projects (rather than a smaller number) was identified to capture the projects that best help achieve Plan goals and objectives. While the Plan will be used to support several funding opportunities, it is not itself a funding document. It is acknowledged that including "degree of benefit" criteria in the prioritization process would be desirable. It did not prove possible in many instances, however, to directly compare benefits generated by the wide range of project types included in the Plan. (For example, comparing water quality improvements to generation of new water supply cannot be performed objectively.) Further, within the area of water quality, benefits could not be compared for projects targeting different parameters. While "degree of benefit" was not included in the initial prioritization, "degree of benefit" will be considered as part of a more subjective process that will be implemented to identify projects for funding consideration. To minimize subjectivity, the process for prioritizing projects was developed prior to considering and ranking projects. This process was developed through an interactive discuss</p>
NYG-31	G-2	6		<p>My initial comment here was "what is a local water management plan". However, after reading the appendices I have now learned that it is really numerous plans that all have something to do with water. It is not reasonable to expect that each of these plans- dealing with discrete, special issues will have included everything that should be addressed in integrated planning- nor that the public has any capability to review all of these- and come to some conclusions. Furthermore the text description of plans- and what is actually described in Appendix 13 is not consistent. The text talks about NCCP's- but none of these are included in Appendix 13- and they should be.</p>	<p>No change is proposed. An action plan (see Table G-9 on page G-23) is presented for completing an updated assessment of local water management plans.</p>
NYG-32	G-4			<p>Conservation advocacy groups need to be specifically included (land trusts are just one part of that) Also the agencies responsible for habitat conservation were not included- state and federal wildlife agencies and they should be part of the stakeholders if there is to be real integration of land and water planning as is implied in the overall goals..</p>	<p>As described in Section G, it is anticipated that NGOs such as conservation advocacy groups will choose to be part of the development, formation, and implementation of a Regional IRWM institutional structure. The text on page G-4 will be modified to reinforce this point made throughout Section G.</p>
NYG-33	G-14			<p>IRWM will evaluate and develop the criteria on which to select the priority projects- why isn't this part of the draft plan so that the public has the opportunity to ? It seems like determining priorities is exactly the kind of public input that this plan needs.</p>	<p>No change is proposed. The RAC had not evaluated or selected criteria to develop and select priority projects at the time the Draft IRWM Plan was developed. Where available, such criteria will be included in the Final IRWM Plan, and the public will have an opportunity to participate in the funding/prioritization process through the proposed institutional structure.</p>
NYG-34	G-24		Table G-10	<p>This would imply that the public has no role in reviewing the allocation of prop 50 funds. - which I believe has been the case. However it seems to me that when we are talking about allocating millions of dollars of taxpayer funds the public should be able to review and comment- on prop 50- and any other taxpayer allocation of funds.</p>	<p>Public input to the RAC is solicited and encouraged as part of the actions listed in Table G-10. The text associated with Table G-10 will be modified to reflect this.</p>
NYG-35	G-22			<p>It seems that it will be much harder for workgroups in specialty areas to achieve integration. A watershed based planning approach seems to have a much better chance to achieve real integration.</p>	<p>No change is proposed. The purpose of the work groups is to address specific issues associated with the scientific and technical foundation of Basin Plan beneficial uses and water quality objectives, not achieve integration.</p>
NYG-36	G-3		Table G-9	<p>The issue is really not just determining when the Plan needs to be revised- but there will be a need to revise the numerous water management plans that feed into this- and in some cases produce them where they don't exist. Integrated planning needs to go both directions- with the Plan resolving issues/setting priorities that should then result in changes to the component plans.</p>	<p>Text associated with Table G-9 will be modified to note that ongoing revision of local plans and the need to coordinate the IRWM Plan with modifications in these local plans.</p>

NYG-37	I-5 and beyond			The quantified performance measures shown here are not all directly tied to those shown in the prior section that provided targets for the overall Plan. It seems like the overall Plan needs to define short term priorities- then set up interim measures related to the ultimate measures that have been identified. In some cases these match- for example- # 126 acres of open space (even though I think this is too broad) but in others like # 109 miles of pipeline constructed- this is not directly related to one of the overall targets.. Also there are several items that would seem to be a very high priority- like acres of wetland created- but there appears to be only 1 project # 131 Lake Hodges that identifies this as a measure. Also none of the acquisitions indicate if there are wetlands included- this is important to know when making choices between projects- and should be part of the measurable results.	The project performance measures shown in Table I-1 include measures over and above those addressed by the Plan targets, but all of the listed performance measures presented in Table I-1 in some way relate to attainment of Plan objectives. It should be emphasized that the Plan utilizes a dual (and parallel) approach in attaining objectives. First, the Plan identifies stakeholder-driven projects that are submitted by project proponents and evaluates how these submitted projects help achieve Plan objectives and targets. (The metrics presented in Table I-1 relate to these specific stakeholder-driven projects.) F81 Second, the Plan establishes short-term priorities to help achieve Plan objectives and to help develop information required for future plan iterations. As noted in Section B of+F87 the Plan, many ongoing and proposed water supply, flood control, pollution prevention, habitat conservation/enhancement, and stormwater control projects and programs exist within the Region. Projects submitted by project proponents include only a portion of the overall projects and programs that will help achieve the Plan objectives. Future iterations of the IRV
NYG-38	I-14		Table I-2	One of the key identified measures is "number of wildlife corridor linkages implemented." But not one project identified this as an outcome. This is a critical element of habitat conservation- it should be a targeted measure- but to mean anything there need to be projects that will actually achieve this. The refinement process needs to include the opportunity to add such projects., (and I know several groups that would be happy to work on this.)	Project submittals involving wildlife corridors will be welcomed and encouraged as part of future funding application cycles.
NYG-39	M-5		Table M-2	This table is very misleading about habitat protection. Having an area covered as part of a regional plan does not mean the local agency has adopted it- and in the case of north county only 1 of 7 cities have adopted a sub-area plan. The one that has an approved plan, the city of Carlsbad, has not implemented management of the city-owned land. The plan should distinguish between regional and locally approved plans. In many cases having the regional without an approved local plan and without funding of the local plan means very little.	Table M-2 is intended to show that a number of land use agencies within the Region have participated in a variety of water-related planning activities. The table will be re-labeled to indicate this.
NYG-40	M-5		Table M-2	Carlsbad should be footnote#7 with clarification that they have an adopted HMP.	Table M-2 will be modified to incorporate the suggested information.
NYG-41	M-6	1		This needs to be revised to correctly describe the status of adoption of habitat conservation plans in north county. The regional MHCP is approved by SANDAG. Of the 7 cities only one has an adopted plan. For protection of habitat to be integrated with water planning all areas need to have adopted habitat conservation plans- that address wetland creation, buffers, and wildlife corridors.	The text on page M-6 will be modified to incorporate the suggested information.
NYG-42	M-6	3rd bullet		SANDAG has not held the broad stakeholders group meeting described here for over 4 years. They have been meeting with the cities and wildlife agencies- but have neglected other key stakeholders. A key thing they are doing that should be added is evaluating funding options for the shortfall in habitat management funding- as part of the mandate of Transnet that said the regional habitat funding source should be planned for the ballot in 2008.	Bullet will be modified to note that SANDAG has been meeting with Cities and wildlife agencies.
NYG-43	M-8		Table M-3	Should add that a Watershed management Plan for the Agua Hedionda sub-watershed of the CHU is currently in process.	Table M-3 will be modified to incorporate the suggested information.
NYG-44	M-8	Footnote 7	Table M-3	List of CWN members is not correct. CWN "membership" is only the NGO's that signed an MOU- I can provide that list.. If you want to identify those who were involved in the preparation of the WMP for the CHU that is a different list- and should be taken from the list included in the report.	The footnote will be revised to cite only NGOs as CWN members.
NYG-45	N-4		Table N-2	Need better representation for those advocates for habitat- wildlife agencies plus advocacy groups like the Sierra Club	RAC membership was determined on the basis of providing balanced Regional representation. It was not feasible to have all water-related government and non-government organizations as RAC members, although all may participate in RAC proceedings through the public input process. All such organizations can participate in the development of the proposed Regional institutional structure and can become members of this regional organization.
NYG-46	N-7+		Table N-3	I believe there needs to be much better representation from those groups focused on habitat plans and plants and animals. This should include both the state and federal wildlife agencies, SANDAG, advocacy groups like the CNPS, Audubon, Sierra Club and SD Tracking Team- plus stakeholders in the habitat planning process.	Table N-3 identifies stakeholder outreach efforts to date. Continuation and expansion of this outreach process (see Section G) is a short-term priority of the Plan.

NYG-47				Unclear how the number shown as "total" is determined. It looks like it is the sum of the dots. However- this is not consistent- for example the Carlsbad desal conveyance project has one dot but shows a total of 3 points. Please clarify- or if there are math errors correct them.	The Draft IRWM Plan omitted three columns within Table 7-1. This error will be corrected in the revised Plan.
NYG-48				This includes both Tier 1 and Tier 2 projects. It would be more useful to just focus on Tier 1	The Plan itself focuses on Tier 1, but proponents for Tier 2 projects also need to be able to see how their projects fared.
NYG-49	App 7	p 14	Table 3	Please explain how Carlsbad desal conveyance gets a point for "ecosystem restoration" when the only restoration is required for mitigation of project impacts.	Restoration required as mitigation was awarded credit.
NYG-50	App 7		Carlsbad Desal Conveyance	In my opinion inclusion of this project highlights key flaws in the scoring system- it should not even have been included on the list to start with. This is a project by a private-for-profit company. The conveyance system that supports the delivery of their product should be at their cost- not the taxpayers- this should have been disqualified from the start. Furthermore it should have failed on the screening criteria- "free from insurmountable constraints." The issue of privatizing water by using the ocean is highly controversial, this project is tied to a decommissioned power plant, it has numerous issues with permit by the CA Coastal Commission, and is likely to be subject to litigation throughout its implementation- any one of these items is a significant constraint and can be considered "insurmountable" at this point in time. The project received points for meeting 3 of the Plan objectives- but please explain how it maximizes stakeholder involvement and stewardship or furthers scientific water management. It is a conveyance system- not the desal plant, not technical studies related to desal. It really only meets one objective. It	This project was submitted by a public agency (Olivenhain MWD). While the desal facility itself is being initiated by a private entity, the conveyance system project included in the Plan is a public agency project. It is also important to note that the Plan is not a funding document, and inclusion in the Plan is not a promise of funding. While controversial, these issues are not considered insurmountable. Desal projects are moving forward throughout the State. If the project does in fact become subject to litigation, it may be re-classified as having insurmountable constraints at that time. The project includes stakeholder involvement and scientific water management elements, allowing it to receive credit for addressing those objectives, even if not the primary purpose of the project. Desalination itself is a strategy, but the project incorporates multiple other strategies in addition to desalination. The project received credit for strategies incorporated as part of the project, even if not the main project focus.
NYG-51	App 7		Low Impact design pilot project	While this specific pilot project was not called out in the CWMP- this concept is. Furthermore it is also supported in the Loma Alta watershed plan and the draft city of Oceanside Sub-area plan. This is exactly the kind of project that should be addressed in the IRWMP- particularly since it is a low cost item- that benefits all watersheds. And if requested, I believe CWN would be happy to be a partner on this project- resulting in additional points for involving more than one entity.	Projects received points only for being specifically called out in existing plans. If CWN would like to partner on this project, please contact the project proponent.
NYG-52	App13	13-2		The correct lead agency for the AHWMP is the city of Vista	Appendix 13 will be modified as suggested.
NYG-53	App 13	13-4		The summary of the CWMP should have included the specific recommended actions- instead of the more general goal statements.	Appendix 13 is intended to provide the reader with a brief plan description and summary of plan goals. The reader can refer to the listed plans if additional information is desired.
NYG-54	App 13			The Plan states that NCCP's, and local habitat conservation plans are part of the referenced documents- but none are included in this Appendix- and they should be.	Summaries of habitat plans will be included in Appendix 13 where possible given constraints of the plan adoption schedule and available staff resources. Additional plan collection and review will take place as part of the proposed action plan for completing and updating assessment of local plans (see Table G-9 on page G-23).
NYG-55	App 14	Att 5		This indicates that the public workshop included input on the issues to be addressed in the Plan. Please clarify where this input is identified and how it got incorporated into the Plan.	Text will be modified to note that minutes from the public workshops were distributed to IRWM Plan authors who considered the input in developing the Draft IRWM Plan.
NYG-56	App 14	Power point	Item 6	On # 6 "Restore and maintain habitat and open space" the last bullet is "role of NGO's." I do not recall this being addressed in the plan. Please clarify what was discussed about this at the public workshop- and where this is included in the Plan.	The role of NGOs was addressed at the workshop. As noted in the handout presented at the workshop for Objective #6, a variety of NGOs are involved in restoring and maintaining habitat and open space, and these NGOs work independently (and cooperatively with government agencies) toward purchasing or managing land, providing flight and migration corridors for wildlife, creating connected blocks of preserves, removing invasive species, and educating and involving the public.
NYG-57	App 10			Reviewing the information in this table makes it clear that a number of these projects are not really yet ready for implementation. The process needs to have a better way to distinguish those immediately ready vs. those that are not- perhaps with a programmed potential implementation and schedule of funding requirements by year so that a multi-year /phasing plan can be developed.	The IRWMP is not a funding document, but is an ongoing planning process. Projects included in the Plan do not need to be ready to implement. Some future funding opportunities, however, will require projects to be ready to implement. Where that is required, projects that are not ready to implement will not be proposed for funding.
NYG-58	App 10			There should be some general guidelines about funding. While it is certainly reasonable that there will be a number of very costly projects- there should be some additional guidelines/review for those projects over a specified funding threshold. Furthermore, what review has there been on the validity of cost estimates as it sounds like this is just based on applicants submittals? I again raise concern about the desal plant- which is the second most costly project. Including this very costly project in Tier 1 resulted in another project not making the cut. Funding this very costly project also means that numerous lower cost projects could have been funded within the same total budget. The plan should assess such trade-offs- yet has no mechanism to do so.	The comments are noted, and these issues will be considered as future funding packages are developed. The IRWMP is a plan, and while it will serve as a basis for some funding opportunities, it is not a funding document. Additional work will be required to identify projects for inclusion in future funding applications.

NYG-59	General		Project Description	It is very hard to assess the potential benefits of projects when there is no project description- one can only guess from the title. A 1-2 sentence description of the project is the minimum that should be provided if you expect any meaning full comment. This could be added to the project scorecards.	This suggestion will be incorporated for Tier 1 projects.
NYG-60	General		Project Number	It is difficult to locate particular projects when they are just organized by a somewhat arbitrary alphabetical listing by Project Title.	The comment is noted. Several alternative means of organizing projects were considered (listing by project type, agency, or watershed) but each proved unwieldy as many projects involved more than one objective, implementing agency, or watershed. In the absence of any better option, organizing the projects by project title was used as a default.
NYG-61	General		Initial December Project Submittals	I believe it is important to assess what happened to the project list between the initial 2 page submittals in December of 2006 and the final project list included in the Plan. Of course I am particularly concerned because the 2 projects I submitted in Dec are not included in the plan- although shortly after submittal I was told it would be over a year before anything more detailed would be required. Subsequently I spoke to project partners and for each project one of the other partners agreed to take the lead. When we were later told that another submittal was needed in April I was assured that the new lead organization would follow-through. In both cases days before the new deadline they informed me they would not be able to get this submitted in time- and it was too late for us to respond. Then I was told by IRWMP staff that there would be future opportunities for submittals- but these turned out to all just apply to those projects that had been submitted in April- and my two projects are now completely out of the loop. The vague statements about further rounds of applications are not very reassuring. I request that you re-look at your application process and assure that all submittals from each round have a fair chance.	As you note, all project proponents were contacted to indicate that they would need to submit a project application form requesting information important to allow projects to be prioritized. It is unfortunate that the commenter was unable to provide the requested information within the specified timeframe, however due to the Proposition 50 timeline and timeline for completing the draft Plan, additional time could not be allotted. Another call for projects will occur in advance of the next funding opportunity (Proposition 84), and proponents will once again be contacted to request information. It should also be noted that the current Proposition 50 opportunity will only provide between \$0 and \$25 M to the Region, while Proposition 84 will provide the region with \$91 M, allowing a significantly larger number of projects to be funded. The IRWM website (www.sdirwmp.org) and email announcements will provide additional information on Proposition 84 project submittal criteria (anticipated in the summer of 2008).
NYG-62	General		Strategic Plan	I realize that this entire process is primarily to assure that our county is competitive in applying for these new Statewide funds. It appears that mid stream it was determined that the application needed to better reflect the State water plan in order to improve our ability to compete. What I don't see in the Plan is any strategic / contingency planning that looks at potential funding levels/timing/and results for our area. Are there a few key projects, that are ready to go, that could jumpstart some things and show some early measurable results? Are there some high ticket/high risk projects that should be deferred? What is a reasonable expectation of funding to our county in the next 5 years and how well does the Plan match up to that? What measurable results do you expect from this initial \$ 735m investment? How much money will it take to achieve all of the targets identified? How much of that funding is reasonable to expect from this bond fund? How much of potential project funding should be held in reserve- to cover critical needs not identified at this time, or respond to changing conditions? None of these kinds of	When Proposition 84 was released, the Region became aware that IRWMPs supporting Prop 84 will need to consider Water Plan strategies; thus the conversion from Prop 50 to Water Plan strategies. The Plan, while required for Proposition 50 and future opportunities including Proposition 84, is not a funding document. The details of specific funding opportunities will need to be considered as they are released in determining which projects are most appropriate for those opportunities. This is not the purpose of the IRWM Plan, which has detailed requirements established by DWR and the SWRCB.
NYG-63	General		What is Missing	Most of the focus of this Plan is sustainable water supply for an ever increasing population. Shouldn't part of this integrated planning focus on the other key issues of sustainability- like global warming and energy?	The plan is a water-based plan. Energy and global warming (as they relate to water) issues are addressed within the plan, and can be considered by the Region in determining project prioritization and future Plan updates.
PANG-1	F-10	N/A	F-2	Table F-2 does not match the table in Appendix 10. On one hand, Table F-2 has "Green Street LID Porous Paving and Infiltration" as a Tier I project while the Appendix 10 table does not. On the other hand, the Appendix 10 table has "Green Lot Porous Paving and Infiltration, Phase 2" as a Tier I project while Table F-2 does not. Perhaps both tables should list "Green Street LID Porous Paving and Infiltration" as a Tier I project, and "Green Lot Porous Paving and Infiltration, Phase 2" as a Tier IA project.	The tables will be updated as suggested.
PANG-2	A-8	2	A-2	Revise first sentence to "The City of San Diego's Storm Water Pollution Prevention Division (Storm Water Division) is within the City's General Services Department."	Text on page A-8 will be revised as suggested.
PANG-3	A-8	2, 3	A-2	Replace all occurrences of "Storm Water Program" with "Storm Water Division."	The change will be made as suggested.
PANG-4	A-8	2	A-8	Add "Area of Special Biological Significance (ASBS) implementation" right after "Total Maximum Daily Load (TMDL) implementation."	Text on page A-8 will be revised as suggested.
PANG-5	B-2	N/A	Boxed text	Per the Regional Board, the Peñasquitos Hydrologic Unit is divided into two Watershed Management Areas (WMAs): the Los Peñasquitos WMA and the Mission Bay WMA.	The text box will be revised to note this fact.
PANG-6	B-15	N/A	B-9	Per the Regional Board, the Peñasquitos Hydrologic Unit is divided into two Watershed Management Areas (WMAs): the Los Peñasquitos WMA and the Mission Bay WMA.	A footnote will be added to Table B-9 to note this fact.
PANG-7	Throughout Plan			Change project title from "Green Lot LID Porous Paving and Infiltration, Phase II" to "City of San Diego Green Lot Porous Paving and Infiltration, Phase II."	The project title will be modified as suggested.

PANG-8	Through ut Plan			Change project title from "Green Mall LID Porous Paving and Infiltration" to "City of San Diego Green Mall Porous Paving and Infiltration, Phase I."	The project title will be modified as suggested.
PANG-9	Through ut Plan			Change project title from "Green Mall LID Porous Paving and Infiltration, Phase II" to "City of San Diego Green Mall Porous Paving and Infiltration, Phase II."	The project title will be modified as suggested.
PANG-10	Through ut Plan			Change project title from "Green Street LID Porous Paving and Infiltration" to "City of San Diego Green Street Porous Paving and Infiltration, Phase I."	The project title will be modified as suggested.
PAN-11	Through ut Plan			Change project title from "Green Street LID Porous Paving and Infiltration, Phase II" to "City of San Diego Green Street Porous Paving and Infiltration, Phase II."	The project title will be modified as suggested.
PANG-12	Through ut Plan			Change project title from "Municipal Rooftop Rain Harvesting and Downspout Disconnections" to "City of San Diego Municipal Rooftop Rain Harvesting, Phase I."	The project title will be modified as suggested.
PAN-13	Through ut Plan			Change project title from "Municipal Rooftop Rain Harvesting and Downspout Disconnections, Phase II" to "City of San Diego Municipal Rooftop Rain Harvesting, Phase II."	The project title will be modified as suggested.
PANG-14	Through ut Plan			Change project title from "Watershed-Based Street Sweeping Program" to "City of San Diego Watershed-Based Street Sweeping Program, Phase I."	The project title will be modified as suggested.
PANG-15	Through ut Plan			Change project title from "Watershed-Based Street Sweeping Program, Phase II" to "City of San Diego Watershed-Based Street Sweeping Program, Phase II."	The project title will be modified as suggested.
PANG-16	Through ut Plan			Change project sponsors/proponents for the following projects from "City of San Diego" to "City of San Diego Storm Water Division" Green Lot LID Porous Paving and Infiltration, Phase II Green Mall LID Porous Paving and Infiltration Green Mall LID Porous Paving and Infiltration, Phase II Green Street LID Porous Paving and Infiltration Green Street LID Porous Paving and Infiltration, Phase II Municipal Rooftop Rain Harvesting and Downspout Disconnections Municipal Rooftop Rain Harvesting and Downspout Disconnections, Phase II Watershed-Based Street Sweeping Program Watershed-Based Street Sweeping Program, Phase II	Sponsors/proponents will be updated.
PANG-17	C-i	N/A	TOC	Revise "Object H - Restore, restore, and maintain habitat and open space" to "Objective H - Protect, restore, and maintain habitat and open space."	The TOC title for Objective H will be revised as suggested.
PANG-18	N/A	N/A	Appendix 7	The City of San Diego Storm Water Division's porous paving and infiltration project proposals are similar in nature and impacts. Review of the scorecards reveals inconsistency in assigning scores as to whether these projects "create new water." The Storm Water Division believes that, as stated in its applications (Question No. 4), the infiltration nature of these projects may contribute to groundwater recharge by capturing urban runoff and allowing it to percolate into the ground. Revise the scorecards accordingly for the following project proposals for consistency: La Jolla Shores Ocean Protection Project Green Lot LID Porous Paving and Infiltration, Phase II Green Mall LID Porous Paving and Infiltration Green Mall LID Porous Paving and Infiltration, Phase II Green Street LID Porous Paving and Infiltration Green Street LID Porous Paving and Infiltration, Phase II	Per direction given at Public Meeting, LID projects will not receive new water credit
PASEK-1			Table D-5 Section E.2	There seems to be discrepancy between Table D-5 [Objectives Supported by Water Mgt Strategies] and Section E.2 [Water Mgt Strategies Directly Addressing Objectives]. Is there a difference between these two things? Assuming D-5 and E.2 are getting at the same thing, then it seems the solid dots in D-5 [defined in footnote as "Water Mgt Strategy primarily and directly supports attainment of the Objective"] should equal the primary water mgt strategies listed for each objective in the text in E.2. But, they don't match up, at least for Objectives D, G, H, and I. We've edited Table D-5 to match section E.2. We have submitted this as a separate document.	Table D-5 of the IRWM Plan will be modified as suggested.

PASEK-2			Table F-2 & Appendix 7	<p><i>This is a different comment from 1B below don't confuse 'em.</i></p> <p>Two project applications for Hodges submitted separately by the Olivenhain Municipal Water District [OWMD] and the Santa Fe Irrigation District [SFID] have been combined into one project. The City of San Diego Water Department is now the contact agency for the melded project.</p> <p>Specifically, the melded project combines:</p> <ul style="list-style-type: none"> • <u>Lake Hodges Water Quality Improvements Projects</u> (099), submitted by OMWD, and • <u>Lake Hodges Water Quality and Watershed Management Programs</u> (131), submitted by SFID. <p>Please delete those two project applications from the SD IRWM Plan and substitute the melded application. The title of the melded project application is <u>Hodges Reservoir Water Quality Improvements Implementation Projects</u>.</p>	The comment has been incorporated into Section F and Appendix 7.
PASEK-3			Table F-2 & Appendix 7	<p><i>This is a different comment from 1A above don't confuse 'em.</i></p> <p>Two project applications for Hodges submitted separately by the Olivenhain Municipal Water District [OWMD] and the Santa Fe Irrigation District [SFID] have been combined into one project. The City of San Diego Water Department is now the contact agency for the melded project.</p> <p>Specifically, the melded project combines:</p> <ul style="list-style-type: none"> • <u>Lake Hodges Water Quality Improvements Plan</u> (100), submitted by OMWD, and • <u>Lake Hodges Water Quality Improvements Study</u> (133), submitted by SFID. <p>Please delete those two project applications from the SD IRWM Plan and substitute the melded application. The title of the melded project application is <u>Hodges Reservoir Water Quality Improvements Plan</u>.</p>	The comment has been incorporated into Section F and Appendix 7.
PASEK-4			Table F-2 & Appendix 7	The two melded project applications for Hodges described in 1A and 1B above are fundamentally the same as the four projects they replace. However, there are substantial differences from the applications submitted previously. The two melded applications should be "scored" from scratch.	The comment has been incorporated into Section F and Appendix 7.
PASEK-5			Table F-2 & Appendix 7	We have created new standardized project titles for 31 projects applications submitted by City of San Diego Departments. The new standardized titles are in a separate Excel spreadsheet with file name <u>summary of CSD projects submitted May 07 v11 071207.xls</u> . We have provided this file. The new project titles are superior and should be substituted throughout the Plan and Appendices.	The project scoring, database, and appendices have been updated to reflect the comment.
PASEK-6			Table F-2 & Appendix 7	Staff of the San Diego Water Department have provided clarifying information and comments for thirteen project applications. This clarifying information will affect each project's scores. We ask that RMC consider it closely. The clarifying information and comments are highlighted in yellow in project applications, which we provided as separate MSWord files on a CD. The twelve projects [using new standardized project titles] are listed in items #5-#17, below:	See responses below.
PAS3K-7			Table F-2 & Appendix 7	Mission Valley Basin Brackish Groundwater Desalination Pilot Project	The project was not awarded points for inclusion in an existing plan, EJ or DAC benefits because the information provided was not specific. The "other" statewide priority was not included because the same benefits are listed under CALFED. All other changes accepted.
PASEK-8			Table F-2 & Appendix 7	North County Brine Conveyance Pipeline Feasibility Study	The project was not awarded points for pollution prevention because it does not reduce pollution. The "other" statewide priority was not included because the same benefits are listed under CALFED. All other changes accepted.
PASEK-9			Table F-2 & Appendix 7	Central San Diego Formation Groundwater Desalination Demonstration Project	The project was not awarded points for EJ benefits because the information provided was not specific. All other changes accepted.
PASEK-10			Table F-2 & Appendix 7	San Pasqual Basin Conjunctive Use (Storage and Recovery) Full-scale Project - Planning and Design	The project was not awarded points for remediation because the project does not address removal of contaminants from groundwater. Points were not awarded for water quality or Objective G because the benefit was unclear. All other changes accepted.
PASEK-11			Table F-2 & Appendix 7	San Pasqual Basin Brackish Groundwater Desalination Full-scale Project - Planning and Design	The project was not awarded points for EJ and DAC benefits because the information provided was not specific. All other changes accepted.
PASEK-12			Table F-2 & Appendix 7	City of San Diego Parklands Recycled Water Retrofit and Distribution System	The project was not awarded points for multiple partners, EJ and DAC benefits because the information provided was not specific. All other changes accepted.
PASEK-13			Table F-2 & Appendix 7	City of San Diego Recycled Water Infill Project	The project was not awarded points for multiple partners, EJ and DAC benefits because the information provided was not specific. Points were not awarded for urban runoff because the connection was not clearly established. All other changes accepted.

PASEK-14			Table F-2 & Appendix 7	North City Recycled Water Distribution System Expansion-Phase II	The project was not awarded points for multiple partners, EJ and DAC benefits because the information provided was not specific. Points were not awarded for urban runoff because the connection was not clearly established. All other changes accepted.
PASEK-15			Table F-2 & Appendix 7	North City Recycled Water Distribution System Expansion -Phase III	The project was not awarded points for multiple partners, EJ and DAC benefits because the information provided was not specific. Points were not awarded for urban runoff because the connection was not clearly established. All other changes accepted.
PASEK-16			Table F-2 & Appendix 7	San Diego Water Department Cornerstone Lands Management and Source Water Protection	The project was not awarded points for EJ benefits because the information provided was not specific. The justification for switching to all hydrologic units was not well supported and credit was not given. All other changes accepted.
PASEK-17			Table F-2 & Appendix 7	Dulzura Creek Source Water Protection through Property Acquisition and Habitat Restoration	The project was not awarded points for EJ benefits because the information provided was not specific. All other changes accepted.
PASEK-18			Table F-2 & Appendix 7	San Vicente Reservoir Source Water Protection through Watershed Property Acquisition	All changes were accepted.
PASEK-19			Table F-2 & Appendix 7	Lower Otay Reservoir Hypolimnetic Oxygenation System for Water Quality Improvement	The project was not awarded points for multiple partners, EJ and DAC benefits because the information provided was not specific. All other changes accepted.
PASEK-20			General	We have prepared an abstract for each of the 31 project applications submitted by City departments. Each abstract is ≤100 words and attempts to contain the following content: location, description, actions, benefits. We recommend that similar abstracts be prepared for other projects, at least for the Tier 1 projects that will be considered by the Prop 50 Project Selection Workgroup. The abstracts, along with standardized project titles and other pertinent information, has been provide as a separate document [see item #3 above].	Thank you!
ROD-1				Please find attached a few of our project worksheets that we have made revisions to per discussions at the June 29th meeting. Please note this is only SOME of our original submissions. The other ones we felt we couldn't gain anymore points so we did not revise them.	Changes to California Friendly Makeover (new water), California Friendly Replacement Incentive (new water and partners), Carlsbad Desalination Project Local Conveyance (new water, DAC, EJ), Habitat enhancement & invasive species control program for OWMD's easements and the OWMD (new water, cooperating partners), and Weather-Based Irrigation Controllers Rebate Program (new water, cooperating partners) have been accepted, and the project database has been revised to reflect the changes.
SMITH-1	General	Project: Santee ...	General	The committee has selected to combine the Santee Water Reclamation Facility Expansion and the El Monte Valley Groundwater Recharge Projects. We would like to point out that these projects can proceed independently with many of the same benefits. We also would like to point out that the project has multiple phases that could be viewed as separate projects to proceed with shorter scheduled and lower costs. We respectfully request the two projects be separated. We have confirmed with Padre Dam MWD, and they have agreed to separate the two projects. We respectfully submit an adjustment to our Application, Section 1 Project Title, change to "El Monte Valley Groundwater Recharge and River Restoration Project." The project will need to be added throughout the draft IRWM Plan. Attached is a mark-up of Appendix 7, Table 4, Project Prioritization Scorecard for the El Monte Valley Groundwater Recharge and River Restoration Project as a separate project.	The projects have been separated per the requests of Helix WD and Padre Dam MWD.
SMITH-2	6	Project: Santee ...	Appx 7, Table 1	ADD separate row for the El Monte Valley Groundwater Recharge and River Restoration Project - need to indicate bullets for the 1st, 2nd, 4th, and 5th Objectives	Table 1 of Appendix 7 will be updated to address the comment.
SMITH-3	12	Project: Santee ...	Appx 7, Table 2	ADD separate row for the El Monte Valley Groundwater Recharge and River Restoration Project - need to indicate bullets for the all Hydrologic Units and count should be 11. We respectfully submit an adjustment to our Application, Section 3 to add that the project impacts all Hydrologic Units through reduced water needs for the region by utilizing the new recycled water/groundwater source of up to 5,000 acre-feet per year. [Note: as a minimum the San Diego, Sweetwater, and Otay Hydrologic Units are affected through water distribution to Padre Dam MWD and Otay Water District of the water generated from the project].	Modification to project application has been accepted and the project has been rescored.
SMITH-4	N/A	Project: Santee ...	Appx 7, Figures: Hydrologic Units	ADD the El Monte Valley Groundwater Recharge and River Restoration Project name to all the Hydrologic Unit Figures. [Note: as a minimum the San Diego, Sweetwater, and Otay Hydrologic Units].	Agreed. The project has been re-evaluated and rescored.

SMITH-5	38	Project: Santee ...	Appx 7, Table 4	El Monte Valley Groundwater Recharge and River Restoration Project - score for the Benefits Multiple Hydrologic Units. There are 11 units benefited, therefore the score should be 100.	Agreed. The project has been re-evaluated and rescored.
SMITH-6	38	Project: Santee ...	Appx 7, Table 4	El Monte Valley Groundwater Recharge and River Restoration Project - score for the Benefits Disadvantaged Communities. We respectfully submit an adjustment to our Application, Section 2, Project Benefits, Disadvantaged Community Benefits: "This project benefits disadvantaged communities within the Helix Water District, Padre Dam MWD, and Otay Water District service areas (Cities of El Cajon, La Mesa, Lemon Grove, Chula Vista, and communities in the County of San Diego). The River Restoration component of the project will provide no cost trails, recreation, and environmental education to the local community." Therefore the score should be 100.	Modification to project application has been accepted and the project has been rescored.
SMITH-7	38	Project: Santee ...	Appx 7, Table 4	El Monte Valley Groundwater Recharge and River Restoration Project - score for Linked to Other Projects or Programs. Our Applications clearly shows several linked projects including the adjacent River Park Conservancy Projects, the Joint Water Agency Natural Community Conservation Plan/Habitat Conservation Plan (JWA NCCP/HHP), and the Santee Water Reclamation Facility Expansion, which are projects within the IRWM Plan. Therefore the score should be 100.	Agreed. The project has been re-evaluated and rescored.
SMITH-8	38	Project: Santee ...	Appx 7, Table 4	El Monte Valley Groundwater Recharge and River Restoration Project - score for Provides Environmental Justice Benefits. We respectfully submit an adjustment to our Application, Section 2, Project Benefits, Environmental Justice Benefits: "The socioeconomic profile of the communities within the watersheds affected by the project (such as Lakeside) are less affluent. The project would provide recreational opportunities for this underserved area in El Monte Valley including trails, interpretive signage and walking tours." Therefore the score should be 100.	Modification to project application has been accepted and the project has been rescored.
SMITH-9	N/A	Project: Santee ...	Appx 7, Project Prioritization Scorecard	El Monte Valley Groundwater Recharge and River Restoration Project - Criterion: Spans Multiple Hydrologic Units - Raw Score should be 50, Weighted Score should be 5, add "Sweetwater and Otay" in Supporting Information for Hydro. Units.	Agreed. The project has been re-evaluated and rescored.
SMITH-10	N/A	Project: Santee ...	Appx 7, Project Prioritization Scorecard	El Monte Valley Groundwater Recharge and River Restoration Project - Criterion: Linked to Other Projects - Raw Score should be 100, Weighted Score should be 10, add "JWA NCCP, Santee Water Reclamation Facility Expansion, and River Park Conservancy Projects" in Supporting Information for Linked Projects.	Agreed. The project has been re-evaluated and rescored.
SMITH-11	N/A	Project: Santee ...	Appx 7, Project Prioritization Scorecard	El Monte Valley Groundwater Recharge and River Restoration Project - Criterion: Directly Benefits Disadvantaged Communities - Raw Score should be 100, Weighted Score should be 6, add "Project has service areas considered disadvantaged. By providing the El Monte River Restoration Project, the project provides benefits to disadvantaged communities that could be utilized by disadvantaged communities that may have fewer local recreational amenities."	Agreed. The project has been re-evaluated and rescored.
SMITH-12	N/A	Project: Santee ...	Appx 7, Project Prioritization Scorecard	El Monte Valley Groundwater Recharge and River Restoration Project - Criterion: Addresses Environmental Justice Concerns - Raw Score should be 100, Weighted Score should be 6, add "The socioeconomic profile of the communities within the watersheds affected by the project (such as Lakeside) are less affluent. The project would provide recreational opportunities for this underserved area in El Monte Valley including trails, interpretive signage and walking tours."	Agreed. The project has been re-evaluated and rescored.
SMITH-13	N/A	Project: Santee ...	Appx 7, Project Prioritization Scorecard	El Monte Valley Groundwater Recharge and River Restoration Project - Total Weighted Score should be 100. Note this will need to be adjusted throughout the rest of the IRWM Plan.	Agreed. The project has been re-evaluated and rescored.
SMITH-14	10-3	Project: Santee ...	Appx 10	El Monte Valley Groundwater Recharge and River Restoration Project - the dates and cost information should reflect the information provided in the Application for the project. For Planning/Study, Start 12/1/05 and Finish 6/1/08. For Demonstration, Start 7/1/07 and Finish 6/1/08. For Design, Start 2/1/07 and Finish 6/1/08. For Env. Doc. Permitting, Start 2/1/07 and Finish 2/1/08. For Construction, Start 6/1/08 and Finish 6/1/16. For Implementation is 2016. For Total Budget \$62,500,000. For Annual O&M \$20,000,000 (one-time). For Grant Funding Requested \$6.25. For Matching Funding \$56.25. For Match Type "River Restoration/Property Sale/CIP." Note these dates and costs are for Phase 2 that applies to Prop. 50 funding (see Applications for Phase 3 for future funding opportunities).	The database has been updated, and the project split into 12.1 and 12.2 given two separate budgets.

SMITH-15	11-9	Project: Santee ...	Appx 11	El Monte Valley Groundwater Recharge Project - the benefits information should reflect the information provided in the Application. Includes "(1) Produce drought-proof water supply for 10,000 households; (2) 5,000 AF reduction in Water Authority imported water demand; (3) Over 80% achievement of the San Diego County Water Authority's 2020 goal for local groundwater production; (4) legacy 500-acre River Restoration Project including habitat, trails and recreation of 135 acres of river bottom/riparian habitat, and 169 acres of upland and woodland habitat along the San Diego River, 40 acres of restored lake features, and 8 acres of protected archeological sites; (5) utilize an underutilized groundwater basin in El Monte Valley; (6) reuse wastewater which decreases the overall waste discharges to the Pacific Ocean; (7) replaces a planned Golf Course Project with a River Restoration Project; (8) provides ability to utilize additional groundwater storage of 6,000 to 8,000 acre-feet for water supply and emergency storage use; (9) provides opportunities for habitat restoration identified in the MSCP/NCCP;	Benefits have been updated per the comment.
SMITH-16			(cont.)	(10) creates a positive working partnership among several agencies in the region; and (11) local well owners will be converted from well supply to potable water supply."	Benefits have been updated per the comment.
SMITH-17	12-3	Project: Santee ...	Appx 12	ADD separate row for El Monte Valley Groundwater Recharge and River Restoration Project - Add check marks for all items except "Project Reduced Carbon Emissions".	Since no supporting information has been provided, the project is being scored consistent with original application. No to TMDL and WQ.
SMITH-18	General	Project: Santee ...	General	We would like an opportunity to review and comment on the input of the project "El Monte Valley Groundwater Recharge and River Restoration Project" into the IRWM Plan since it was not included in the draft. Please let us know if your review and scoring differs from our comments.	Opportunity was provided.
STOUT-1		Table F-2	Tier 1 Project list	<p>Preserving Peutz Valley Watershed</p> <p>This IRWM Plan proposed project should be maintained in the Tier 1 list of projects for the following reasons</p> <ul style="list-style-type: none"> * The 78 acre parcel termed 'Viejas West' has received \$300,000 funding from the State EEMP program. This grant must be used by 5/1/08. Total acquisition cost is ~\$1M. * This parcel is included in the County MSCP. * This parcel is bounded on two sides by the Cleveland National Forest. * This parcel contains very high biological resource value including a globally significant population of the San Diego thornmint, listed under ESA, CESA. * The parcel contains two drainages from Viejas Mtn, which converge on the property and drain into Peutz Valley and El Capitan Reservoir, San Diego's largest drinking water reservoir. * The Viejas West parcel is under threat of development, but also has a willing seller. * Two other parcels in the Peutz Valley watershed of ~40 acres each has a willing seller and is adjacent to preserve lands already owned by BCLT. * This project in the San Diego River and Basin area of the IRWM Plan has a WMS rank of '5' in the 'SDIRWM Projects List'. 	The comment is noted.
STOUT-2		Table F-2	Tier 1 Project list	<p><u>Details regarding biological resources:</u></p> <p>Diverse plant communities - chamise chaparral, coastal sage scrub, southern oak riparian woodland, and native grassland.</p> <p>Coast live oaks provide habitats in riparian drainages.</p> <p>Raptors - golden eagles, red tail hawk, red shoulder hawk, Cooper's hawk, black shouldered kite, American kestrel, and the great horned owl.</p> <p>Mammals - mountain lion, bobcat, coyote, and the gray fox.</p> <p>Threatened San Diego horned lizard.</p> <p>Additional parcels to be acquired in the Peutz Valley watershed are shown in orange and green. Parcels owned by the Back Country Land Trust, or already in dedicated open space, are shown in blue.</p> <p>(MAP ATTACHED)</p>	The comment is noted.
TUCK-1	A-3		List of plans that encompass water management strategies	Where does the RCP and regional plans fit in?	No change is planned. The purpose of Section A is to provides describe the RWMG and provide a brief into to the IRWM Plan.
TUCK-2	A-6		The City of San Diego is Region's	Missing "the"	The recommended correction will be made to Section A.2.
TUCK-3	A-6		The City and County are also responsible...	Is this statement true?	Yes. The City of San Diego and County of San Diego land use jurisdiction extends over the majority of the Region's lands.

TUCK-4	A-7		Programs that provide opportunities to pursue integration...	Integrated?	The recommended correction will be made to Section A.2.
TUCK-5	B-4		Regional Overview	Reference to table B-1 should be from 2006 updated 2030 forecast	The recommended correction will be made to Section B.1.
TUCK-6	B-5		Table B-1	Need new forecast numbers from 2006	A footnote will be added to note that newer numbers are available from SANDAG and that existing plans referenced in the IRWM Plan are primarily developed based on the 2003 projections.
TUCK-7	B-6		Table B-2 and B-3	Need new forecast numbers from 2006	A footnote will be added to note that newer numbers are available from SANDAG.
TUCK-8	B-9		Table B-6 and text: SANDAG (2003) does not project...	Need new forecast numbers from 2006	A footnote will be added to note that newer numbers are available from SANDAG.
TUCK-9	B-10		Table B-6	Need new forecast numbers from 2006	A footnote will be added to note that newer numbers are available from SANDAG.
TUCK-10	B-16		(last paragraph) Santa Margarita River Watershed represent an most important	"an" should be "a"	The recommended correction will be made to Section B.3.
TUCK-11	B-17		Ground and surface and waters	Extra "and"	The recommended correction will be made to Section B.3.
TUCK-12	B-23		... sentence... While State and local governments de	An example that could be used is the relationship developed between the County and the Tribes as well as SANDAG and the Tribes. A representative is now sitting on SANDAG Committees. Please let me know if you would like more information.	The SANDAG example will be cited as suggested in Section B.4.
TUCK-13	B-40		Bacteria resulted beach closures	Missing "in"	The recommended correction will be made in Section B.5.
TUCK-14	B-42		Toxic Organic Compounds	First sentence, "inorganic" should be "organic"	The recommended correction will be made in Section B.5.
TUCK-15	B-44		Figure B-14	Where is this figure? Or, is it a table?	Collation error: Figure B-14 should have been located after page B-44.
TUCK-16	B-47		Toxic Organics Compound	Put TOC in parenthesis after heading b/c used later	The recommended correction will be made in Section B.6.
TUCK-17	B-49		Figure B-15	Figure missing	Collation error: Figure B-15 should have been located after page B-50.
TUCK-18	B-52		Invasive species impacting...	The word "includes" should be singular?	The recommended correction will be made in Section B.7.
TUCK-19	B-54, 55		Figure B-16, 17	These figures are referenced but not present	Collation error: Figures B-16 should have been located after page B-54.
TUCK-20	B-57		Figure B-17	References Figure B-17 (missing)	Collation error: Figure B-17 should have been located after page B-56.
TUCK-21	B-61		Figure B-18	References Figure B-18 (missing)	Collation error: Figure B-18 should have been located after page B-62.
TUCK-22	B-66		...the new SANDAG 2030 population forecast	Not new because 2006 is the new. CWA used the current forecast at the time but should not be referenced as new since another forecast has come out since the preparation of the 2005 URWMP.	The label "new" will be omitted, the use of the 2003 forecast will be cited, and the availability of the newer 2006 forecast will be noted.
TUCK-23	B-71		...also recovery poor quality	"recover" not "recovery"	The recommended correction will be made to Section B.10.

TUCK-24	B-71		Groundwater represents the exclusive	Needs paragraph indentation	The recommended correction will be made to Section B.10.
TUCK-25	C-1		Section C. Summary- Through an public...	"a" not "an"	The recommended correction will be made in the section summary.
TUCK-26	C-2		Through a stakeholder-driven process and adaptive process...	Condense? (a stakeholder-driven and adaptive process)	The word "process" will be deleted as suggested on page C-2.
TUCK-27	C-3		Stakeholders input	Singular, plural or possessive?	Text on page C-3 will be modified to "stakeholder input".
TUCK-28	C-6		... relations between water quality	Should be "relationships"?	The recommended correction will be made on page C-6.
TUCK-29	C-7		...considerable cost benefits of cost sharing	Clarify? I was confused by this sentence.	Text on page C-7 will be revised to state "agencies may recognize benefits of cost sharing, economies of scale, and ..."
TUCK-30	C-8		Objective D, first section before comma	Awkward wording	Text on page C-8 will be modified to delete the word "Plan" and insert the phrase "Plan, local water plans, and the County's General Plan 2020, ..."
TUCK-31	C-8		(more than \$160 gross regional product)	Footnote?	The \$160 million value will be referenced back to Table B-7 on page B-11.
TUCK-32	C-8		...imported supply proposed by Metropolitan.	Awkward wording	Text on page C-8 will be modified to state: "... Metropolitan, and Metropolitan ordered a 50 percent cutback of the imported supplies."
TUCK-33	C-12		Projected to be comprises of approximately	Should be "comprised"	The recommended correction will be made on page C-12.
TUCK-34	C-12		...with the many of the Region's	Remove first "the"	The recommended correction will be made on page C-12.
TUCK-35	C-16		Bullet at top of page...developing, implementing, and maintaining...	Exchange "aquatic" with "wetland"	The recommended correction will be made on page C-16.
TUCK-36	C-16		Table C-8	What are the numbers and how will they be determined? There may not be numbers in local plans.	The comment is noted. Targets will be developed consistent with local plans, public input, and Regional needs.
TUCK-37	D-2		Table D-1 present water management	Should be "presents"	The recommended correction will be made.
TUCK-38	D-11		...facilities with Regional	Should be "the region"	The recommended correction will be made.
TUCK-39	D-16		(last paragraph) ...strategies that known to...	Missing "are"	The recommended correction will be made.
TUCK-40	D-19		Table D-6 identify ...	Should be "identifies"	The recommended correction will be made.

TUCK-41	D-19		(3)...water resources management plan	Resource?	The recommended correction will be made.
TUCK-42	D-25		D.5	Are the terms hydrographic and hydrologic interchangeable?	Yes, but the IRWM Plan text will be revised to use the term hydrologic.
TUCK-43	E-2		IRWN planning will be conducted within	Missing "be"	The recommended correction will be made.
TUCK-44	E-7		...recreation through enhance aesthetics	"enhance" should read "enhanced"	The recommended correction will be made.
TUCK-45	E-11		...integrate to enhance the reliability Region's water...	Missing "of the" or "of"	The recommended correction will be made.
TUCK-46	E-12		Increased coordination of project , improved system efficiency...	Should read "projects"	The recommended correction will be made.
TUCK-47	E-17		Table E-3 ... summarize additional benefit	Should be "summarizes"	The recommended correction will be made.
TUCK-48	E-17		(last paragraph) Within section G, actions plans are...	Should be "action"	The recommended correction will be made.
TUCK-49	F-6		Maintain public involvement section first sentence before comma	Awkward wording	Text on page F-6 will be modified to break the long sentence into two parts.
TUCK-50	F-9		(last paragraph) "This is the first time..."	Reference public workshops in past tense for final draft	The recommended correction will be made.
TUCK-51	G-1		(first paragraph) Section G.1 first sentence	Something is missing	The sentence will be revised to state "... Implement short-term priorities and begin the process..."
TUCK-52	G-3		(first paragraph) "Proposition 50, Chapter..."	Do not need to reference again the three RWMG members and the MOU?	The recommended correction will be made.
TUCK-53	G-4		(last paragraph) "IRWM Plan, however..."	"the" should read "they"	The recommended correction will be made.
TUCK-54	G-7		Examples of existing institutional structures	San Diego Association of Governments is not a JPA. SANDAG has many designations but the federal designation is that we are an MPO (Metropolitan Planning Organization). SANDAG was recently consolidated through state legislation that changed our status from a JPA to a state designation as a Regional Consolidated Agency. Please let me know if you need more information.	Text in Section G.2 will be modified to address the comment.
TUCK-55	G-9		(second paragraph) "CUWCC was..."	Remove "Memorandum of Understanding" because already identified short hand as MOU	The recommended correction will be made.
TUCK-56	G-16		"RAC meeting in 2007"	Since 2007 is almost over is this accurate? Will there be enough time to get into the institutional structure as the "focal point"?	The sentence will be revised to "RAC meetings in 2007 and 2008..."
TUCK-57	G-19		"Table G-6 presents..."	"actions" should read "action"	The recommended correction will be made.

TUCK-58	G-20		“...constitute an important the first step...”	Remove “the”	The recommended correction will be made.
TUCK-59	H-3		Ecosystem Improvement section, 4 th bullet	Change to read “creation of wetlands, buffers, or other habitat”	The recommended correction will be made.
TUCK-60	H-5		(last paragraph) species also represents...	“represents” should be “represent”	The recommended correction will be made.
TUCK-61	H-11		Objectives requiring regional solutions	Objectives A, B, and C mentioned as having regional solutions on page H-11 but A-I are mentioned on the next page in more detail as having regional solutions.	No change is proposed. Regional solutions will be required to achieve all nine objectives. As noted, short-term action plans are proposed to help attain the overarching Objectives A, B, and C
TUCK-62	H-16		(last paragraph) “...Water Project to...”	Should read “State Water Project water to San Diego”	The recommended correction will be made.
TUCK-63	I-2		“...watershed plans provide the basis...”	Should read “...watershed plans that provide the basis...”	The recommended correction will be made.
TUCK-64	I-4		(last paragraph) “...The Responsible...”	Repetitive with text on page I-10?	The repetitive text will be deleted.
TUCK-65	I-10		Program Performance section	Repetitive with text on page I-4	The repetitive text will be deleted.
TUCK-66	I-10		“...Programs leads.”	Should read “Program leads”	The recommended correction will be made.
TUCK-67	Section J		General comment	Run habitat information by Tom Oberbauer and his group at the County of SD	The comment is noted.
TUCK-68	J-11		“...and regional MSCP efforts...”	MSCP efforts are a sub-regional plan	The recommended correction will be made.
TUCK-69	J-11		“...part of these regional MSCP efforts...”	Should read “...part of these sub-regional habitat conservation programs (e.g., MSCP South)”	The recommended correction will be made.
TUCK-70	J-12		Table J-5	More info on monitoring available at www.dfg.ca.gov/mscp	The comment is noted.
TUCK-71	J-12		Table J-5 (Other tools)	Other tools should be “community assessments and wildlife linkages functional assessments	The comment is noted.
TUCK-72	J-13		General comment	Insert bulleted list of all 2007 efforts such as Bird Atlas, Plant Atlas, and County of San Diego Rare Plant Monitor.	The comment is noted.
TUCK-73	J-13		General comment on whole page	Delete it or make each paragraph 1 – 2 sentences long	The recommended correction will be made.
TUCK-74	J-17		Habitat and Natural Resource Monitoring	In some areas, habitat maps are over 10 years old and are in need of updates.	Text will be revised to note this fact.
TUCK-75	J-17		“Regional habitat mapping efforts...”	Should read “Habitat mapping efforts...”	The recommended correction will be made.
TUCK-76	J-17		Habitat and Natural Resource Monitoring	The state has contracted with San Diego State University who is working with USGS and USFWS to explore protocols, data analysis, and query tools to make this data easier to collect and understand.	This fact will be added to the page J-17 text.
TUCK-77	J-22		General comment	The Stat of California BIOS (Bio-geographic Information and Observation System) is a new database for habitat and species monitoring.	Reference to the BIOS system will be added to Section J.

TUCK-78	J-25		"...data to the CERES and CEDEN ..."	BIOS should be referenced	Reference to the BIOS system will be added to Section J.
TUCK-79	K-1		"...thousand personnel hours of staff..."	Duplicative?	The recommended correction will be made.
TUCK-80	K-2		Last paragraph "...Businesses and industries dependent..."	Is this a practice we want to promote, doesn't the Water Authority want to reduce landscape water use?	No change is proposed. While the Water Authority and local water agencies promote conservation, it is recognized that businesses associated with landscaping and vegetation can be impacted by water shortages.
TUCK-81	K-7		"...subsequent funding cycled..."	Should read subsequent funding cycles.	The recommended correction will be made.
TUCK-82	M-4		SANDAG RCP	Adopted in 2004, not 2005	The recommended correction will be made.
TUCK-83	M-4		"Smart Growth Concept"	Should read "Smart Growth Concept Map"	The recommended correction will be made.
TUCK-84	M-6		Habitat Protection Plans, second bullet	County is not involved and not implemented by 9 jurisdictions; only 6 have approved implementing agreements.	The text will be revised to delete the reference to 9 municipalities.
TUCK-85	M-5		Table M-2	Check for accuracy, some jurisdictions with approved habitat conservation plans have not adopted the plans at the local level (e.g. San Marcos and Vista).	Table M-2 will be footnoted to note that habitat conservation plans have not been adopted by all municipalities.
TUCK-86	M-6		Habitat Protection Plans, third bullet	Should read "TransNet Environmental Mitigation Program, where SANDAG coordinates with local jurisdictions, wildlife agencies, the building industry, and environmental groups/stakeholders to acquire open space for mitigation and provide funding for management and monitoring.	The recommended correction will be made.
TUCK-87	M-9		"...will be reviewed detail and..."	Should read "...will be reviewed in detail and..."	The recommended correction will be made.
TUCK-88	M-10		"Encourage Community involvement..."	Should be "Encourage community involvement..."	The recommended correction will be made to page M-10.
TUCK-89	M-14		"(e.g. flood control plan...(e.g. flood..."	The use of both examples is repetitive.	Repetitive text will be deleted from page M-14.
TUCK-90	M-17		"San Diego Association of Governments"	Should read SANDAG	The recommended correction will be made to page M-17.
TUCK-91	N-5		"Project Clean water is an inclusive..."	Repetitive with page N-3	Repetitive text will be deleted from page N-5.
TUCK-92	N-6		"...RAC member or as an advisory role..."	Should read "RAC member or as an advisor..."	The recommended correction will be made to Section N.2.
TUCK-93	N-7		"Barrio Logan..."	Should read "Barrio Logan"	The recommended correction will be made to Section N.2.
TUCK-94	N-11		"...and a developing and implementing..."	Should read "...and developing and implementing..."	The recommended correction will be made to Section N.2.
TUCK-95	N-13		(last paragraph)"... areas identified being..."	Should read "...areas identified as being..."	The recommended correction will be made to Section N.3.

TUCK-96	N-14		(first paragraph) "...the needs to those..."	Should read "...the needs of those..."	The recommended correction will be made to Section N.3.
TUCK-97	O-1		Section O Summary	San Diego Association of Governments is redundant with SANDAG	The recommended correction will be made to page O-1.
TUCK-98	O-4		"...of federal NPDES permit, water..."	Should read "...of federal NPDES permits, water..."	The recommended correction will be made to page O-4.
TUCK-99	O-6		"...representatives from the south Orange"	Remove "the"	The recommended correction will be made to page O-6.
TUCK-100	O-7		"...SANDAG has been invited..."	Present tense	The recommended correction will be made to page O-7.
VARTY-1	A-4	1		Regional Water Management Group: The three RWMG agencies are equal partners...This section should have addressed the fact that the City of San Diego effectively owns 40% of SDCWA, because 10 of the 34 board members are appointed by the City. This gives the City of San Diego a much greater than 1/3 weighted vote, they are not equal partners.	No change is proposed. Each of the RWMG agencies provided equal funding to the IRWM effort, and each agency provided technical staff. Technical staff of each of the three agencies provided input that was equally valued and considered.
VARTY-2	A-4	4		The Water Authority, City of San Diego, and County of San Diego are appropriate agencies for managing development of the initial IRWM Plan. Were these three agencies asked to be the only participants in the MOU Group? Were they elected? Who decided the Water Authority, City and County are the appropriate agencies? Other plans either have elected bodies or the MOU group is allowed to be anyone who is willing to put in the time.	No change is proposed. As set forth in Section A, the County, City, and Water Authority are appropriate RWMG agencies. The RWMG was formed per State IRWM guidelines, and each RWMG agency contributed funding to prepare the IRWM Plan. The RWMG formed the RAC for regional guidance, and has pledged to work with local agencies to form a regional IRWM institutional structure that will be comprised of government and non-government entities.
VARTY-3	A-4	4		The cities (other than San Diego) in San Diego County are not represented. The Water Authority represents the water agencies (and water interests of some cities), the County represents the NGO's but the City of San Diego only represents the interests of San Diego City. For example, the water users of the city of Escondido are represented, but the city of Escondido with its tax base is not represented.	No change is proposed. State IRWM guidelines do not require each and every agency within the Region to participate within the RWMG. Section A provides adequate rationale for the County, City, and Water Authority to act as the RWMG. As discussed within the Draft IRWM Plan, these three agencies have wide-ranging land and water management responsibilities throughout the Region, and are appropriate for kick-starting the Region's IRWM Planning effort. The County represents stormwater runoff agencies (e.g. municipalities) with respect to water quality and storm runoff control issues. SANDAG (represented on the RAC) is comprised of elected officials from the Region's municipalities and the County.
VARTY-4	B-3	2		Wastewater Service: I was not aware that the entire county was regionalized. I think this may be true for large portions of the county, but not all.	The text on page B-3 will be modified to note that large portions of the County are served by regional wastewater systems.
VARTY-5	B-24	1		Water Supply Agencies: Also should be included in this paragraph: CIRC (Cooperative Interagency Resources Coalition) is a website sponsored by the Water Authority. The site provides a forum for sharing information and resources among member agencies.	Page B-24 provides a general description of water agencies and systems within the Region, and mention of a regional website is out-of-place on this page. Mention of CIRC will be added within Section J.2 (existing monitoring) as an information source.
VARTY-6	B-60	B-18		Regional Wastewater/Recycled Water Facilities: OMWD's 4-S Reclamation Facility is not on this map.	Figure B-18 will be modified as suggested.
VARTY-7	G-2	2		Existing Institutional Structures - RWMG and RAC: The relationship between the RWMG and RAC is supposed to be attached as Appendix 8, Part 1. It is not. As you know we agreed that the three RWMG members would go to their respective boards and include language clarifying the role of the RAC. When is this going to happen?	The RWMG MOU is included as Appendix 9.
VARTY-8	G-3	2		While some regions have been able to organize and govern around watersheds, this proves to be difficult for the San Diego Region. I really object to this paragraph. We have some watersheds who have worked well for decades. We haven't tried to put together a formal IRWM by watershed, how can we say it's too difficult when we haven't tried?	No change is planned. As noted in the Draft IRWM Plan, a watershed approach may represent a future means of planning within the Region, but not all watersheds are equal from a participation and progress standpoint.
VARTY-9	G-10	chart		Regional Policy Committee: Why do we need a Management Committee, seems redundant.	No change is planned. As noted on page G-5, the management committee would meet frequently to address Plan issues and administer grant funds. It would not appear feasible for the entire organization voting structure to perform this task.

VARTY-10	G-11	1		Funding Mechanism: Funding can also be provided through disbursed funds from grants. For example 5% of all grants in LA County go to the administration of the grants. I object to members having to pay a fee to belong to the Management Committee.	No change is proposed. Table G-1 identifies potential funding sources and notes that funding can be provided through disbursed funds from grants. Actual funding mechanisms will be evaluated and determined by the RWMG, RAC, and entities interested in joining the Region's institutional structure.
VARTY-11	G-11	2		Administering Entity: This should be voted upon by the group	No change is planned. As noted on page G-11, the RWMG and RAC will discuss options and develop a proposed approach for a long-term institutional structure.
VARTY-12	K			Financing: For reasons stated previously I believe this section should be included earlier.	No change is planned. The IRWM Plan is organized around State IRWM Plan guidelines, and Section K of the guidelines address financing.
VARTY-13	K-2	1		Once the IRWM management structure is finalized, it is anticipated that agencies/organizations participating in the management structure will share in funding of IRWM management/oversight operations. If we are expected to fund the ongoing activities we should be part of the RWMG from the beginning. We are being asked to implement and pay for a process we really have no responsibility (other than in an advisory capacity) for forming.	The comment is noted.
VARTY-14	M-2			Water Supply Plans: How are these plans incorporated? Have all these plans been read or are they incorporated by staple? Or are the agencies supposed to summarize their plans?	As documented in Section M, a number of the Region's water agency plans have been identified and referenced. Individual agencies need not summarize their individual plans, but as part of project applications should note which plans the proposed projects implement.
VERR-1	F-8	NA	Section F	The Department of General Services (DGS) recommends that points (at least 50 - 75) be credited for projects that implement strategies or methods identified in existing plans even throughout the project may not have been specifically identified in the plan or plans. For example, the Department's County of San Diego Chollas Creek Runoff Reduction and Groundwater Recharge Project (Project) implements a number of strategies identified in the <u>Chollas Creek TMDL Source Loading, Best Management Practices, and Monitoring Strategy Assessment</u> prepared for the City of San Diego. However, our Project, which assists to implement City of San Diego and Regional Water Board objectives in the Chollas Creek watershed, was not identified in the City's Plan because the Plan focused on what the City would do.	Comment noted. The criterion is intended to identify projects that were developed through previous planning processes. Every project being considered throughout the region would be able to point to a plan with which is "consistent" - as a result, that criterion would no longer be meaningful.
VERR-2	M-15	NA	Section M	DGS recommends that Table M-6 be revised to include a new category of Agency, Public Facilities Management Agencies. DGS and similar agencies through the Region have been directed to oversee the design, construction, maintenance, and management of public facilities in all of the hydrologic units included in the Draft IRWMP. Implementation of the plans of these agencies does have significant impact on water quality, runoff reduction, groundwater recharge, and many other factors and strategies cited in the Draft IRWMP. The plans of these agencies, represented as Capital Improvement Plans and Strategic Facility Plans, are essentially public facility "Land Use Plans". The County of San Diego, DGS for example, currently plans and manages over 85 facilities and sites located throughout nine regional watersheds. DGS is currently planning and/or designing 6 new or remodeled facilities.	Table M-6 will be revised as suggested.
VERR-3	5-1	NA	Appendix 5	DGS did not initially indicate all of the secondary water management strategies addressed by our Project (County of San Diego Chollas Creek Runoff Reduction and Groundwater Recharge Project) because of an oversight on our part. We did not fully understand all of the strategy definitions. After reviewing the discussion of Water Management Strategies in Section D of the June 6, 2007 Public Review Draft of the 2007 San Diego Integrated Regional Water Management Plan, we have a more clear understanding of projects benefitting secondary as well as primary strategies that can be considered for credit. Therefore, in addition to the strategies listed in Appendix 5 as being addressed by our Project, we request credit for addressing the following additional secondary strategies: Ecosystem Restoration (#8); Environmental and Habitat Protection & Improvement (#9B); Floodplain Management (#10); Urban Land Use Management(#19); Recreation &Public Access (#24); Water Resources Data Collection, Management and Assessment; and Enhance Scientific and Technical Water Quality Management Knowledge. Please note that other similar low impact development (LID) porous pavement and infiltration projects	Because supporting information was not provided to justify the additional strategies, reviewers used their best judgment to determine applicability of these strategies to this project. Credit was given for all strategies requested except recreation and public access because the connection was not clear.

VERR-4	2	NA	Appendix 7, Table 1	After reviewing the descriptions of the IRWMP objectives in Section C of the Public Review Draft of the 2007 IRWMP, DGS requests that Table 1 of Appendix 7 (Objectives Met by IRWM Plan Projects) be amended to indicate that the County of San Diego Chollas Creek Runoff Reduction and Groundwater Reduction Project also meets the Protect, Restore, and Maintain Habitat and Open Space objective. The implementation of our Project will include multiple low impact development techniques that will reduce runoff and therefore the transport of pollutants into open space channels in the Chollas Creek Watershed. This will help to protect habitat and enhance native biological habitat by reducing nuisance flows and stormwater discharges in excess of predevelopment conditions.	Project has been rescored accordingly, database and appendices have been updated.
VERR-5	8	NA	Appendix 7, Table 2	After the clarifications provided at the June 29, 2007 San Diego IRWMP Public Meeting, DGS understands that outreach and education to other hydrologic units count for spanning and/or benefitting multiple hydrologic units. Therefore, DGS requests that Table 2 of Appendix 7 be amended to credit the County of San Diego Chollas Creek Runoff Reduction and Groundwater Recharge Project with benefitting all 11 hydrologic units. The Project is an demonstration project designed to influence future projects constructed by the County of San Diego throughout the County. Furthermore, the Project includes an outreach and education program that will target municipal, professional, construction and environmental audiences in all 11 hydrologic units.	Based on the understanding that there will be an education program targets every hydrologic unit, credit will be given for all hydrologic units.
VERR-6	15	NA	Appendix 7, Table 3	DGS comments on Appendix 7, Table 3 are similar to our comments on Appendix 5 (Comment Item # 3). Specifically, DGS did not initially indicate all of the secondary water management strategies being addressed by our County of San Diego Chollas Creek Runoff Reduction and Groundwater Recharge Project because we did not fully understand all of the strategy definitions. After review of the discussion of Water Management Strategies in Section D of the June 6, 2007 Public Review Draft of the 2007 San Diego Integrated Regional Water Management Plan, we have a more clear understanding of what is included in each of the strategies. Hence, in addition to the strategies listed in Appendix 5 as being addressed by our Project, we request credit for addressing the following additional strategies: Ecosystem Restoration (#8); Environmental and Habitat Protection Improvement (#9B); Floodplain Management (#10); Urban Land Use Management (#19); Restoration & Public Access (#24); Water Resources Data Collection, Management and Assessment; and Enhance Scientific and Technical Water Quality Management Knowledge. Similar low impact development (LID), porous pavement and infiltration projects from o	Because supporting information was not provided to justify the additional strategies, reviewers used their best judgment to determine applicability of these strategies to this project. Credit was given for all strategies requested except recreation and public access because the connection was not clear.
VERR-7	29	NA	Appendix 7, Table 4	DGS requests Preliminary Scoring and Ranking Results in Appendix 7, Table 4 under County of San Diego Chollas Creek Runoff Reduction and Groundwater Recharge Project be revised to incorporate scores of 100 for Benefits Multiple, Hydrologic Units and Incorporate Multiple Water Management Strategies to reflect the corrections that we have noted above in Comment Item #7. We also request that the Project be given credit for implementing strategies identified in another entity's plan to which we referred in developing our Project. Please see our Comment Item # 1. In addition, we request that the total score be adjusted to reflect the changed scores for individual components of the scoring matrix.	Project has been rescored accordingly, database and appendices have been updated.
VERR-8	11-2	NA	Appendix 10	DGS requests that the summary of Project Benefits for the County of San Diego Chollas Creek Runoff Reduction and Groundwater Recharge Project be revised to indicate that it will also serve as a demonstration LID Project for municipal, builder/developer, industrial, and architectural/engineering/planning audiences in all 11 hydrologic units and that its outreach program will target audiences from all of the hydrologic units.	Benefits have been updated.
VERR-9	12-1	NA	Appendix 12	As a result of the information obtained at the June 29, 2007 IWRMP public workshop and our second review of the Draft IRWMP, DGS requests that Appendix 12 be reviewed to indicate that the County of San Diego Chollas Creek Runoff Reduction and Groundwater Recharge Project also conforms with the following Statewide Priorities: Implement TMDLs, Implement State Board NPS Plan, and Implement State Board Task Force Recommendations. In addition, we request that Appendix 12 be revised to indicate that the Project conforms with the following program preferences: Integrated Project with Multiple Benefits; Project Results in Long-Term Attainment of Water Quality Objectives; Project Eliminates or Reduces Pollution or Pollutants; and Project Provides Safe Drinking and Water Quality for Disadvantaged Communities. These requests are corrections to our earlier oversights and are consistent with conformance credit given to other agencies with similar projects and our increased understanding of Statewide Priorities and Program Preferences as explained in Section L of the Public Review Draft of the 2007 San Diego	Because supporting information was not provided to justify the additional priorities and preferences, reviewers used their best judgment to determine applicability to this project. Credit was given for requested items except the SW of Task Force Recommendations and the Program Preference of Safe Drinking Water because the connection was not clear.
WAT-1	B-2	2	Section B	Since stormwater is also regulated through the general industrial and construction permits, it might be more appropriate to say that "municipal stormwater runoff within the entire Region..." rather than just "stormwater runoff within the entire Region."	Text on page B-2 will be modified as suggested.

WAT-2	B-11	3	Section B	It would be valuable to also identify the percentage of annual precipitation that occurs within the peak two or three months, as well as the typical number of rain days during the year, in order to present a more complete picture of rainfall patterns.	The comment is noted, but no change is planned. The objective of this section is to present a general overview of the Region's precipitation, and to note that (1) significant geographical variation in precipitation occurs in the Region, and (2) a significant majority of the precipitation occurs during a few winter months. The information in the Draft IRWM Plan seems to already do this. Additional statistical evaluation of precipitation, streamflow, and environmental parameters can be added to future versions of the plan if plan preparation budgets and schedules allow.
WAT-3	C-19	NA	Table C-11	Three bullet points in the listing of challenges to achieving objective C should be revised to present a more accurate description of the challenges. The description of Basin Plan use designations in bullet 15 should be modified by substituting "past, present, and probable future uses" for "actual use" in order to be consistent with California Water Code Section 13241. Bullet 17 should be revised to include the concept of feasibility. Bullet 19 should be corrected to recognize that the State Water Board adopted a listing/delisting policy after much public input, reviewed the policy briefly after adoption of the 2004/2006 303(d) list, and agreed to a further review after completion of the 2008 303(d) list. In addition, a bullet could be added to indicate that the Basin Plan should clearly consider which water quality conditions could reasonably be achieved consistent with California Water Code Section 13241.	Bullets #15 and #17 will be modified as requested regarding beneficial uses. Bullet #19 will be modified to recognize that ongoing consideration of applicability of 303(d) listings is required.
WAT-4	G-21	2	Section G	The bullet points in paragraph two should be revised to be consistent with any changes made in response to my suggested changes to Table C-11 (item 3).	Bullets on page G-21 will be modified as suggested.
WAT-5	F-8	NA	Section F	Partial credit should be given for projects that implement strategies or methods identified in existing plans even though the project may not have been specifically identified in a plan or plans.	All projects implement strategies or methods identified in existing plans; as a result, if this criterion was included all projects would score equally.
WAT-6	5-1	NA	Appendix 5	Appendix 5 should be reviewed to ensure that similar projects are given credit for implementing essentially the same strategies, consistent with Sections D and E of the Draft IRWMP.	As described at the public workshops and RAC meetings held earlier this year, the team will not be reviewing every project to ensure that the proponent claimed all possible benefits. Where a proponent claims specific benefits, those benefits have been reviewed to be sure that the project does incorporate the elements being claimed and that points are being awarded consistently between projects.
WAT-7	15	NA	Appendix 7, Table 3	Appendix 7, Table 3 should be reviewed to ensure that similar projects are given credit for implementing essentially the same secondary strategies.	As described at the public workshops and RAC meetings held earlier this year, the team will not be reviewing every project to ensure that the proponent claimed all possible benefits. Where a proponent claims specific benefits, those benefits have been reviewed to be sure that the project does incorporate the elements being claimed and that points are being awarded consistently between projects.
WEST-1				The Department of Water Resources' (DWR) Prop 50 Ch 8 IRWM Grant Program Guidelines state on page 17 (C) that "The Plan must address major water related objectives and conflicts within the region..." The San Diego IRWMP covers approximately 23% of the Santa Margarita River Watershed (SMR), which is the most adjudicated watershed in the region. The SMR is an important water source for the north county area. It provides potable surface water to Camp Pendleton and residents in the De Luz and Fallbrook areas, and groundwater recharge that benefits private residents in the North County area as well as the communities of Fallbrook and Oceanside. Reclamation recommends that the IRWMP report better identify how the plan will work to strengthen and coordinate regional planning efforts with jurisdictions and water-wastewater agencies in southwest Riverside County located within the entirety of SMR watershed.	Efforts have been initiated (see Section .4) to coordinate San Diego Region IRWM planning efforts with the Riverside and Orange County IRWM Plan efforts. As noted in Section O.4, San Diego Region RWMG representatives will continue to coordinate with these Riverside and Orange County efforts. Coordinating between the regional plans must be a cooperative and evolving effort, and internal planning efforts and institutional structures within each region must be better developed in order to evaluate and implement specific means of strengthening coordination among the efforts. To ensure continued coordination, an action item will be added to Table G-10 (page G-24) for coordinating the update of the San Diego Region IRWM Plan with southwest Riverside County. The Region's agencies will look toward USBR and other interjurisdictional agencies to help assist in this future coordination between the San Diego, Riverside, and Orange County IRWM efforts.
WEST-2				The IRWMP also covers approximately 23% of the Tijuana River Watershed (TRW). Although the TRW crosses international boundaries, there are government agencies, organizations and quasi-government entities working to resolve cross-border issues and manage the entire TRW. Reclamation recommends that the IRWMP report better identify how the plan will work to strengthen and coordinate cross border planning efforts with U.S. and Mexico stakeholders.	Initial coordination efforts have been initiated, but Section O.5 will be revised to note that coordination with watershed management activities in the Tijuana watershed will be pursued. One means of coordination will be through participation and promotion of the Las Californias Binational Conservation Initiative (an IRWM Plan project). More specific coordination measures must await (1) development of the Region's IRWM institutional structure, and (2) coordination consensus and direction received from the institutional participants. To ensure continued coordination, an action item will be added to Table G 10 (page G-24) for coordinating the update of the San Diego Region IRWM Plan with U.S./Mexico cross border entities. The Region's agencies will look toward the federal government to assist in this international coordination.

WEST-3				On page F-2, third paragraph, the discussion states "...project proponents will be encouraged to better integrate and combine projects and work together on related projects to maximize overall benefits and minimize project costs." Reclamation recommends that the overall discussion in Section F (e.g. pages F-8 through F-18) be expanded to include more detail on how the statement from page F-2 will be achieved. This should include how the RWMG, RAC, stakeholders and project applicants will work together to "integrate and combine" projects and what the factors are that will be considered for integrating projects. Some key factors to consider should be to combine projects within a watershed that will result in increased benefits, reduced duplication of efforts, overall project cost savings and meet more IRWMP strategies than the stand alone projects.	Page F-2 will be revised to note that, at this time, the RAC has decided to not force project proponents to combine projects, but to instead indirectly encourage integration and combination by publishing (within the IRWM Plan) means by which project funding evaluation and scoring and is to be accomplished. With this information, project proponents can coordinate project integration and combination so as to maximize benefits and attainment of Regional objectives, minimize costs, and maximize funding potential. As the Region's IRWM Plan institutional structure is developed, the participants can decide if and how Region-wide measures can be taken to better integrate and combine projects.
WEST-4	C-3			Objective A addresses stakeholder involvement and stewardship and meets the requirements of Goal 4 on the preceding page (C-2). Stewardship is also a primary component of Goal 3. Reclamation recommends that the first paragraph under Objective A be changed to reflect that Objective A meets requirements for both Goal 3 and 4.	Section C of the Plan will be modified as suggested.
WEST-5				Data (or other comments) are missing from the Tables on each of these pages: C-11, C-13, C-14, C-16, I-12, I-13 and I-14. Placeholder comments indicate that values are needed.	The comment is noted. The placeholder values have been inserted until the Region's agencies can develop appropriate numerical values.
WEST-6	C-18		C-10	Similar to comment 3 above, the cell beneath Goal 3 and across from Objective A should be a black circle.	Section C of the Plan will be modified as suggested.
WEST-7	G-2			Section G should include a discussion or framework element to allow for the future coordination and integration (and membership) of regional partners in southern Orange County, southwest Riverside County and U.S.-Mexico cross border entities into the San Diego IRWMP.	Implementation of short-term priorities (see Sections F and G) include actions for increased coordination with Riverside and Orange County IRWM Plan efforts. These coordination efforts will continue on several levels including (1) direct contact and coordination between IRWM groups, (2) coordination on a watershed-level among watershed agencies, (3) coordination on a project-level among agencies cooperatively implementing projects, and (4) coordination efforts associated with pursuit of water planning activities and programs that involve USBR or other federal agencies. To ensure continued coordination, an action item will be added to Table G-10 (page G-24) for coordinating the update of the San Diego Region IRWM Plan with Orange County, southwest Riverside County, and the U.S. Mexico cross border entities.
WOLL-1	189	n/a	Table II	The word "posistion" misspelled in Justification for Modification cell under Integrates Multiple Strategies	The spelling will be corrected as suggested.
ZAC-1			D	One concern is that while Objective D states there is a goal of increasing use of recycled water, there is not a sufficient connection to ensuring a recycled water resource in Objective E. When I say recycled water, I mean locally-used water (wastewater) that is re-treated for potable and non-potable uses. Please look at the whole document and ensure that, despite its notoriety, that wastewater IS still considered a potential resource- one that today we ship millions of gallons of out into the ocean. I do see that there is a goal of increasing capacity for local (wastewater) treatment but it refers specifically to Metropolitan's supplies.	Recycled water is a key component of the Region's projected water supply (see Tables B-30 and B-31). The Draft IRWM Plan establishes specific Region-wide recycled water use targets to achieve Objective D (see Table C-4 on page C-9). Recycled water use within the Region is more closely linked with Objective D (water source diversity) than Objective E (infrastructure reliability). As the comment suggests, however, any measure that increases source diversity can indirectly help improve water supply reliability.
ZAC-2				Another concern I have is that there doesn't seem to be an acknowledgement (at least where I have seen) of creating "distributed" surface water storage capacity. Much like power utilities, there are always opportunities to create one large power plant or have/support many smaller ones. It is so in water resource management too. The plan includes surface storage goals and new reservoirs are always at the forefront. However since finding space for a new lake is just so seriously challenging, we STILL consider creating numerous smaller ones and/or subsidizing cities, businesses, and individuals to create storage such as tanks, large cisterns, etc. (This is in addition to water conservation measures of course and encouragement of grey water use, etc.)	As noted in Table B-22 on page B-58, significant geographical distribution of surface storage reservoirs currently exists in the Region, as surface storage reservoirs exist within eight of the Region's HUs. The need for enhanced geographic distribution of facilities (including storage) to promote reliable water supplies is addressed as part of Objective D (page C-10).
ZAC-3				Lastly while all this planning is super and this draft is very comprehensive, I am concerned that there may be one area that we all need to recognize and prioritize. We need to pay attention to the quality of wastewater treatment as more and more of our water is polluted with chemicals including pharmaceuticals and pesticides, that are not treated by conventional water treatment technology. Not all the water that enters our drinking water system falls from the sky. Our region, as a water-dependent region, needs to join together to promote nationwide support of upgrading (and funding too) our nations wastewater treatment plant technology. After all, in the not-so-distant future, water reuse could become important to us all.	Wastewater treatment can be a key component of the pollution prevention strategy (#13). One of the reasons municipal wastewater treatment is not highlighted to a greater extent in the IRWM Plan is that (1) almost all treated municipal wastewater in the Region that is not used for reclamation or groundwater recharge is discharged to the ocean, and (2) effluent standards established in waste discharge permits issued by the Regional Board define the level of required treatment.