# APPENDIX J

# Response to Comments for Draft 2006-2007 Urban Runoff Monitoring Report

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To: Municipal Storm Water Copermittees
From: Lisa Kay, Project Manager
Subject: Comments received for Draft 2006-2007 Urban Runoff Monitoring Report

Thank you for your constructive and well thought comments to the "San Diego County Municipal Copermittees 2006-2007 Urban Runoff Monitoring Draft Report". This memo documents comments received (Copermittee) and Weston Solutions, Inc. (Weston) response to address each comment. The comments are numbered and are provided based on the order they were received. Each numbered comment by Copermittee is provided below as a reference:

| | |
|---|---|
| Comments 1-19: | City of Santee |
| Comments 20-79 | City of Oceanside |
| Comments 80-173 | County of San Diego (TS) |
| Comments 174-194 | County of San Diego (JW) |
| Comments 195-202 | Port of San Diego |
| Comments 203-276 | City of San Diego |
| Comments 277-338 | City of Carlsbad |
| Comments 339-373 | City of Del Mar |
| Comments 374-377 | San Luis Rey River Watershed Group |
| Comments 378-393 | City of El Cajon/TRC Environmental |
| Comments 394-397 | City of Chula Vista |
| Comments 398-460 | County of San Diego (TC) |

1. **City of Santee:** Section ES.2.2, Page ES-2, 1st paragraph, 2nd sentence: Change the word utilizing to using.

*Weston: The sentence was revised as recommended.*

2. **City of Santee:** Section ES.2.4, Page ES-3, 2nd paragraph, 2nd sentence: Revise sentence by deleting "intent of the" and add "intended" after …occurrence is…

*Weston: The sentence was revised as recommended.*

3. **City of Santee:** Section ES.2.4, Page ES-3, 3rd paragraph, 1st sentence: Clarify sentence statement. It appears the statement should indicate the "report methodology" was used to create the priority tables as opposed to the report.

*Weston: The sentence was revised as recommended.*

4. **City of Santee:** Section ES.4.7, last sentence, Page ES-13: Revise sentence by deleting "are comprised of" and add "include" after …Other uses…

*Weston: The sentence was revised as recommended.*

5. **City of Santee:** Section ES.4.7.2, last sentence in section, Page ES-14: Clarify if the O/E ratio indicates that the water quality of the "reference site" was likely very good. It appears the statement could be inferred to indicate the water quality of the whole watershed.

*Weston: The sentence was clarified to suggest the water quality at this site in Boulder Creek was likely very good.*

6. **City of Santee:** Section ES.5.3, Page ES-23, last paragraph, last sentence: The sentence needs clarification. The monitoring site does not respond to conditions. Would it be better to say the data reflects variability in ecological conditions?

*Weston: The sentence was revised as recommended.*

7. **City of Santee:** Section ES.5.5, Page ES-24: Shouldn't there be a mention that dry weather samples are collected within the MS4 and not the receiving waters?

*Weston: Dry weather samples are collected in both the receiving waters and MS4, depending upon the Copermittee. The current data sharing format does not provide this specific information.*

8. **City of Santee:** Section ES.5.7, Page ES-25, 4th paragraph, 1st sentence: Is the Sweetwater Authority data provided by the City of La Mesa or the Port of SD? The first paragraph indicates it was provided by the Port of SD.

*Weston: The data was provided by the Port of San Diego. The text was revised.*

9. **City of Santee:** Section 10.1.3, Page 10-4: The analytes color, chloride, manganese and sulfates could not be found on the 303(d) list. Please verify.

*Weston: The San Vicente Reservoir is listed on the June 28, 2007 USEPA Approved 303(d) list for chloride, color, manganese, pH, and sulfates.*

10. **City of Santee:** Section 10.1.4, Page 10-6, 1st paragraph, 2nd sentence: Change the word "utilizing" to "using".

*Weston: The text was revised from "utilizing" to "using".*

11. **City of Santee:** Section 10.2.1.1, Page 10-8, Paragraph after table 10-3, 3rd sentence: Recommend deleting the sentence …largest storm of the season to date.

*Weston: The sentence was deleted.*

12. **City of Santee:** Table 10-4, page 10-9: Are TSS and turbidity increasing trends? Need clarification on question, is it a question?

*Weston:* Based on the Mann-Kendall analysis there is a significant increasing trend for these parameters. The Sen's slope is above the benchmark water quality objective (WQO benchmark). TSS is increasing, but the Sen's slope is below the WQO benchmark.

13. **City of Santee:** Section 10.2.3, Page 10-16, 3rd paragraph, 2nd sentence: Is it each MLS catchment or MLS drainage area? Need clarification on question?

*Weston: The drainage area and catchment are meant to be equivalent here.*

14. **City of Santee:** Section 10.2.4, top of Page 10-18: Move the sentence referring to figure 10-6 after the sentence referring to table 10-6. It is confusing that the figure does not follow the sentence.

*Weston: The sentence was moved.*

15. **City of Santee:** Section 10.4.1, Page 10-32, 3rd paragraph: The dry weather discussion in this paragraph needs to indicate that dry weather samples are collected in the MS4 and not in receiving waters.

*Weston: Dry weather samples are collected in both the receiving waters and MS4, depending upon the Copermittee (see comment #7).*

16. **City of Santee:** Section 10.4.2, Page 10-35, 2nd paragraph, last sentence: Add "a" after the words…disturbance as…

*Weston: The letter "a" was added.*

17. **City of Santee:** Section 10.4.2, Page 10-35, 2nd paragraph, last sentence: Add "a" after the words…disturbance as…

*Weston: The letter "a" was added.*

18. **City of Santee:** Section 10.4.3, Page 10-36, Table 10-13: Is dissolved oxygen a gross pollutant and is this why the Lower San Diego HA receives an "A" rating?

*Weston: There is a Section 303(d) listing for pH in subwatersheds 907.12 and 907.11. This listing is the cause of the "A" rating. Dissolved oxygen is not included as a gross pollutant.*

19. **City of Santee:** Section 10.5, Page 10-39, 1st paragraph, 1st sentence: Change the word "Utilizing" to "Using".

*Weston: Text was revised: "utilizing" changed to "using".*

20. **City of Oceanside:** General Comment, All sections: Add a brief explanation why the certain MLS do not receive runoff from the upper watersheds (e.g. dams, etc…) where applicable.

*Weston: Added a comment that the upper watershed does not have a direct hydrological connection because of the reservoir.*

21. **City of Oceanside:** General Comment, All sections: Add clarification if only sites with ponded or flowing water were used in the final counts of dry weather sites.

*Weston: All dry weather data given to Weston was used in the analysis. Information regarding ponded or flowing water is not consistently recorded among Copermittees, and is not used to differentiate the data.*

22. **City of Oceanside:** General Comment, All sections: Could figure captions be formatted with hard returns where indicated?

*Weston: Due to the formatting standard within the report, hard returns in captions were not determined to be appropriate.*

23. **City of Oceanside:** Section ES5.0: The executive summary in the overall executive summary would be more appropriate and concise for the WMA executive summary if every chapter needs and executive summary.

*Weston: This comment was discussed with the Watershed Workgroup. The format for the WMA executive summaries will be developed in the near future with the Monitoring Workgroup.*

24. **City of Oceanside:** Section ES5.0, Introduction, 1st sentence, Page ES5-1: Remove the word "River".

*Weston: Order R9-2001-01 lists the WMA area as San Luis Rey River. The wording was left unchanged.*

25. **City of Oceanside:** Section ES5.0, 3rd paragraph, Page ES5-1: Add statement why runoff area does not include upper watershed.

*Weston: Added a comment that the upper watershed does not have a direct hydrological connection because of the reservoir.*

26. **City of Oceanside:** Section ES5.0, Page ES5-1: The figures are too small to read the associated text.

*Weston: Figures were made slightly larger for ease of viewing.*

27. **City of Oceanside:** Section ES5.0, last sentence on page ES5-1: Add a statement explaining what the hydrograph depicts (for the general audience).

*Weston: Statement was added to each WMA executive summary to better describe the hydrograph.*

28. **City of Oceanside:** Section ES5.0, Page ES5-1: Can the page numbers for the WMA executive summary and the figure captions have a different numbering system?

*Weston: The page numbering was left unchanged to remain consistent with the other sections of the report. We are open to suggestions for future reports if needed.*

29. **City of Oceanside:** Section ES5.0, Page ES5-2: Add "Wet Weather to Table ES5-1 caption after 2006-2007…

*Weston: "Wet weather" was added to captions where appropriate as recommended.*

30. **City of Oceanside:** Section ES5.0, Page ES5-2, last paragraph: Revise the paragraph to indicate that only three storms are monitored per year as opposed to all storms between 2001 and 2007. Can we also state that the historical mean is generally greater than the recent monitoring years results?

*Weston: The term "three storms" was updated for all sections. The historical mean is generally greater than observed in recent years primarily for fecal coliform. However, it is not significantly different and there is an increasing trend for fecal coliform.*

31. **City of Oceanside:** Section ES5.0, Page ES5-3, Figure ES5-5: Why is there a break in the y-axis of the figure?

*Weston: The figure was revised. There is a break to better view the lower range analytes.*

32. **City of Oceanside:** Section ES5.0, Page ES5-3, bottom paragraph: Please add explanation of what the trends are indicative of. Are increasing or decreasing trends good or bad?

*Weston: We typically refrain from indicating whether increasing trends are good or bad. These terms are value judgments and not the results of data analysis*

33. **City of Oceanside:** Section ES5.0, Page ES5-4, Figures ES5-6: What do flat lines for Sen's slope indicate, are they relevant for the WMA ES? (Similar comment as City of Carsbad)

*Weston: Sen's slope is a non-parametric estimate of slope. A flat line indicates that the median change over time is very small. All scatter plots were removed from the executive summaries*

34. **City of Oceanside:** Section ES5.0, Page ES5-4, Constituent Loads paragraph: Please clarify the "expected" loadings analysis. It needs more description about what it is in this paragraph.

*Weston:* Additional text describing how expected loads were estimated has been added to the report.

35. **City of Oceanside:** Section ES5.0, Page ES5-4, Dry Weather paragraph: Clarify if ponded or flowing water was used in the evaluation. Many of Oceanside's dry weather sites were dry. Does this also include County of San Diego Dry Weather Data?

*Weston: This does include County of San Diego data. Both flowing and ponded water sites were used in the evaluation but were not evaluated differently.*

36. **City of Oceanside:** Section ES5.0, Page ES5-5, Bioassessment paragraph. Please re-order discussion from downstream to upstream, clarify that two surveys were conducted at each of three sites, and define O/E ratios.

*Weston: The text was changed to define when sites were sampled and O/E was briefly defined in the summary table. The ordering of streams throughout the report was north to south; upstream to downstream then reference sites. It would take considerable effort to alter the entire report at this stage.*

37. **City of Oceanside:** Section ES5.0, Page ES5-5, Figure ES5-3: Correct caption indicating San Luis Rey as opposed to Santa Margarita River.

*Weston: The caption was corrected.*

38. **City of Oceanside:** Section ES5.0, Page ES5-5 and ES5-6, WMA Assessment Paragraph, 1st bullet: It is recommended to clarify the 1st bullet as explained in section ES.4.2.4 and add periods to all bullets. Since the trends are all increasing, it is recommended to add the word "increasing" for an all inclusive statement in the sentence and remove the brackets in the bullets. Spell out BOD.

*Weston: Bulleted items were revised as requested and "increasing" was added. BOD was spelled out as recommended.*

39. **City of Oceanside:** Section ES5.0, Page ES5-6, Table ES5-4: Spell out DWS as dry weather sites. Add an "s" to the word "Constituent" in the caption and to the word "Exceedance" in the 1st column.

*Weston: The sentence was revised as recommended.*

40. **City of Oceanside:** Section ES5.0, Page ES5-6, Recommendations paragraph: Identify the location of the new TWAS site and add more description of the type of data the TWAS will provide.

*Weston: The location of the TWAS was added. Text was added for more description of the data.*

41. **City of Oceanside:** Section 5.0, Page 5-1: Since the watershed management area is defined in the first sentence, recommend using WMA in later areas of this page.

*Weston: The section was revised as recommended.*

42. **City of Oceanside:** Section 5.1, Page 5-1, last paragraph, first sentence: Recommend shorting the sentence by eliminating redundancies with the words …largest watershed…. Change the word "Enompassing" to "encompases". Also, there is a small portion of the San Luis Rey River Watershed in Riverside County.

*Weston: The sentence was revised as recommended.*

43. **City of Oceanside:** Section 5.1.3, Page 5-5, 5th sentence of the top paragraph: Delete duplicate word "identifies".

*Weston: The sentence was revised as recommended.*

44. **City of Oceanside:** Section 5.1.4, Page 5-5, 2nd sentence of the section: Add discussion of diversions or impoundments of runoff in the upper watershed that do not reach the MLS drainage area.

*Weston: Statement was added regarding the drainage area diversion.*

45. **City of Oceanside:** Section 5.1.5, Page 5-6, 1st paragraph, last sentence: Recommend changing Mt. Palomar State Park to Palomar Mountain State Park.

*Weston: The sentence was revised as recommended.*

46. **City of Oceanside:** Section 5.2.1, Page 5-7, sentence after 3rd paragraph: Recommend moving the reference to hydrographs in Appendix A to the first paragraph under section 5.2.1 on page 5-6.

*Weston: Moved reference to hydrograph as recommended in all sections.*

47. **City of Oceanside:** Section 5.2.1, Page 5-8, 2nd paragraph: Recommend adding an introductory sentence about toxicity testing.

*Weston: An introductory sentence was added as recommended.*

48. **City of Oceanside:** Section 5.2.2.1, Page 5-11: Recommend combining the nutrients and metals discussion into one paragraph since they are brief statements.

*Weston: The discussion of nutrients and metals was revised as recommended.*

49. **City of Oceanside:** Section 5.2.2.2, Page 5-12, 1st paragraph, 2nd sentence: Change font color to black where the reference to Section 3.4 is.

*Weston: The font color was revised as recommended.*

50. **City of Oceanside:** Section 5.2.2.2, Page 5-12, last paragraph, 1st sentence and 2nd sentence: Add a comma after (s=59) in the 1st sentence. Clarify the reference to "the magnitude of the trends are flat at…".

*Weston: Added a comma where recommended and clarified the statement to read the magnitude only shows a slight increase.*

51. **City of Oceanside:** Section 5.2.2.3, Page 5-14, 3rd sentence: What does it mean to say " The results of the storms…" There are storm dates shown on the figure but no other storm related data.

*Weston: The sentence was revised to "results from monitored storm events…" as recommended.*

52. **City of Oceanside:** Section 5.2.2.3, Figure 5-5, Page 5-14: Why is there a break on the y-axis of the figure?

*Weston: The plot was updated to move the break in the y-axis. The break is used so that the small values (especially for metals ratios) can be viewed*

53. **City of Oceanside:** Section 5.2.3, Page 5-15: 2nd paragraph,: Change "that" to "the" in the 3rd sentence. Change the word "loses" to "losses" and a comma after retardation in the 4th sentence.

*Weston: The sentences were revised as recommended.*

54. **City of Oceanside:** Section 5.2.3, Page 5-15: 5th paragraph: Add a comma after events in the 2nd sentence, and after …17.0 hours.

*Weston: The sentence was revised as recommended.*

55. **City of Oceanside:** Section 5.2.4, Page 5-17, 2nd paragraph, 1st sentence: Do the 33 sites investigated refer to all site or only those with ponded or flowing water. Please specify so it does not contradict with our JURMP Reports.

*Weston: Sentence was added to indicate both ponded and flowing sites were included.*

56. **City of Oceanside:** Section 5.2.5, 2nd paragraph: The site descriptions for the third party SWAMP data and locations need to be more clearly described. Also, the description of results needs more clarity on which sites the results are referring to.

*Weston: The third party section was revised as recommended. Locations of the sites were described. Additional third party data was obtained from the SWAMP database that was not included in the original draft and relevant discussions were provided.*

57. **City of Oceanside:** Section 5.3, Page 5-20. Can the sites in this section be re-organized to be described from downstream to upstream?

*Weston: See response to comment #36.*

58. **City of Oceanside:** Section 5.3, Page 5-20, 3rd paragraph, 3rd sentence. Recommend making O/E discussion a new paragraph.

*Weston: A hard return was inserted after the 2nd sentence.*

59. **City of Oceanside:** Section 5.3.1, Page 5-20: Recommend changing observed to expected to O/E since it is already defined.

*Weston: This change was made globally.*

60. **City of Oceanside:** Section 5.3.1, Page 5-21, 2nd Paragraph, last sentence: Change "plus" to "and", delete the word "as", and change "community" to "benthic community".

*Weston: This describes a standard metric which represents a cumulative value of the two feeding groups so a" plus" is merited. "as" was deleted and "Benthic" was added to qualify community type.*

61. **City of Oceanside:** Section 5.3.1, Page 5-22 1st paragraph: Add "Mission Road" to the site description of the results discussion. Add more description to the last sentence of the paragraph related to the EC and pH results. It is not clear what the relativity of the results indicate.

*Weston: The text was modified to address these issues.*

62. **City of Oceanside:** Section 5.3.1, Page 5-25, 1st paragraph, 2nd sentence

*Weston: This change was made globally.*

63. **City of Oceanside:** Section 5.3.1, Page 5-25, 5th paragraph, last sentence: Recommended wording changes …surveys "but" October… and delete the word but after 2004.

*Weston: These changes were made.*

64. **City of Oceanside:** Section 5.3.1, Page 5-27, 1st paragraph: Specify Doane Creek reference site in Palomar Mountain.

*Weston: This change was made.*

65. **City of Oceanside:** Section 5.3.1, Page 5-27, 1st paragraph: There is discussion of Benet Road in this section. Verify the ratios presented match the site described.

*Weston: The discussion was for Doane Creek and the O/E values are correct. The mention of Benet road was corrected.*

66. **City of Oceanside:** Section 5.3.1, Page 5-27, 3rd paragraph: It is confusing which insects dominated in which months? In the last sentence, clarify the comparison to either the watershed or the county?

*Weston: The most important aspect of the benthic community at Doane Creek is its uniqueness in the San Diego County Storm Water program (probably due to the nearly 5,000 foot elevation). Seasonality of the families of insects unique to the site, while interesting*

*biologically, did not affect the overall results. In the interest of brevity and clarity, we avoided lengthy discussions of individual taxa throughout the report.*

67. **City of Oceanside:** Section 5.3.1, Page 5-27, 4th paragraph: Clarify the months (May or October) in the 2nd sentence. Add statement about the relevance of the elevation to the last sentence.

*Weston: Doane Creek is a first or possibly second order stream with a consistently low flow volume in both May and October. This was added to the text.*

68. **City of Oceanside:** Section 5.3.2, Page 5-27: The reference to Mt. Palomar should be changed to Palomar Mountain.

*Weston: This change was made.*

69. **City of Oceanside:** Section 5.4.1, Page 5-28: Make the 1st sentence a paragraph by adding the five constituents. Delete the duplicative listing of Criterion #1 for better flow of the paragraph. It would also help to reference where the ratings are coming from in this paragraph.

*Weston: Text was revised as requested. The reference to the ratings tables is described in the assessment introduction paragraph.*

70. **City of Oceanside:** Section 5.4.1, 5th paragraph, Page 5-28: Define NOEC.

*Weston: The sentence was revised as recommended.*

71. **City of Oceanside:** Section 5.4.2, Table 5-11: Though there are WQO exceedances, they are not defined as persistent in this watershed.

*Weston: Comment appears to be more of a statement. The triad decision does not consider TDS or fecal coliform in the decision matrix since they are not believed to induce a toxic response in aquatic organisms. This is stated in the paragraph below the table.*

72. **City of Oceanside:** Section 5.4.3, 2nd paragraph: Add a B to the LTEA ratings.

*Weston: The sentence was revised as recommended.*

73. **City of Oceanside:** Section 5.4.3, Page 5-32, 2nd paragraph: After San Luis Rey River WMA…add "as a whole, although there were for the lower HA.

*Weston: The sentence was revised as recommended.*

74. **City of Oceanside:** Section 5.4.3, Page 5-33, 1st paragraph, last sentence: Change "sub-watershed" to "HA"

*Weston: The sentence was revised as recommended.*

75. **City of Oceanside:** Section 5.5, 1st paragraph, 1st sentence: Change entirely" to "mostly". Also in paragraph, add language to describe why runoff area is only 62% (is it diverted by VID? Or other?)

*Weston: A statement was added to clarify the runoff area.*

76. **City of Oceanside:** Section 5.5, 2nd paragraph: recommended changes to sentence structure for more fluid reading.

*Weston: The sentence was revised as recommended.*

77. **City of Oceanside:** Section 5.5, 3rd paragraph: change total dissolved solids to TDS.

*Weston: The sentence was revised as recommended.*

78. **City of Oceanside:** Section 5.5, 4th and 5th paragraphs: recommended changes to sentence structure for more fluid reading where indicated.

*Weston: The paragraphs were revised as recommended.*

79. **City of Oceanside:** Section 5.5, last paragraph, page 5-35: delete 1st sentence. Revise 3rd sentence to indicate that one TWAS will be added to this watershed and remove the description of the moving to the Loma Alta Creek site.

*Weston: The paragraph was revised as recommended.*

80. **County of San Diego (TS):** General Comment. Change the phrasing used to present stream bioassessment results. Specifically, the phrases "above the impairment threshold" (to indicate non-impairment) and "below the impairment threshold" (to indicate impairment) are counterintuitive to the lay reader

*Weston: This was changed globally to be more intuitive.*

81. **County of San Diego (TS):** General Comment. Remove the scatterplots (significant trend graphs) from the watershed executive summaries. Trends are already clearly summarized in the text. The graphs only raise more questions.

*Weston: All scatter plots have been removed from the WMA executive summaries.*

82. **County of San Diego (TS):** General Comment. Check the "Hydrology and Monitoring Stations" map for each watershed to ensure that all monitoring locations are shown. For example, the bioassessment station located on Camp Pendleton (SMR-CP) is not shown on the map for the Santa Margarita River Watershed.

*Weston: Site SMR-CP was added.*

83. **County of San Diego (TS):** General Comment. Either add the dry weather monitoring stations to the "Hydrology and Monitoring Stations" maps, or indicate in the text that dry weather locations are not shown on the maps.

*Weston: Comment was added to clarify dry weather stations not shown in figure.*

84. **County of San Diego (TS):** General Comment. Search the document and remove all references to the word "priority" or "prioritization" unless they are related to specific findings from the BLTEA. It is particularly important to rename Section 5.1.3 (and its equivalent in other watersheds) something other than "Identification and Prioritization of Water Quality Problems".

*Weston: Heading titles were renamed in all sections as recommended.*

85. **County of San Diego (TS):** Section ES4.0, Page ES4-1, heading: Delete "Introduction

*Weston: The title heading was removed from all WMA executive summaries.*

86. **County of San Diego (TS):** Section ES4.0, Page ES4-1, 1st paragraph, 2nd sentence: Replace "was" with "were". Recommend moving sentence under Watershed Monitoring header.

*Weston: Sentence was revised based on this and other comments.*

87. **County of San Diego (TS):** Section ES4.0, Page ES4-1, 2nd paragraph, 2nd sentence. Incomplete sentence.

*Weston: The sentence was revised.*

88. **County of San Diego (TS):** Section ES4.0, Page ES4-1, 2nd paragraph, 2nd sentence. Add "during the 2006-07 monitoring period".

*Weston: The sentence was revised as recommended.*

89. **County of San Diego (TS):** Section ES4.0, Page ES4-1, 2nd paragraph, bulleted list. Note that wet weather was not performed (see sentence above).

*Weston: Sentence was added to clarify monitoring was not conducted.*

90. **County of San Diego (TS):** Section ES4.0, Page ES4-1, 3rd paragraph, 3rd sentence. Replace "is" with "are".

*Weston: The sentence was revised as recommended.*

91. **County of San Diego (TS):** Section ES4.0, Page ES4-1, Figure ES4-1. Figure does not show SMR-CP bioassessment site. I think it should also show dry weather stations.

*Weston: This figure was revised to include the missing bioassessment site. However, based on other comments, the dry weather reference was clarified to indicate they are not included in the figure. This is primarily due to the figure becoming "too busy" to include the dry weather stations.*

92. **County of San Diego (TS):** Section ES4.0, Page ES4-2, 1st paragraph, 1st sentence. Insert "at the MLS" after conducted.

*Weston: The sentence was revised as recommended.*

93. **County of San Diego (TS):** Section ES4.0, Page ES4-2, 1st paragraph, 2nd sentence. Delete "ratios of the water quality objective (WQO)" and replace with "results". Insert "sampled" after events. Replace 2005 with 2006.

*Weston: This section was revised based on other comments. Date was revised to reflect 2006.*

94. **County of San Diego (TS):** Section ES4.0, Page ES4-2, 1st paragraph, 3rd sentence. Delete "highest" and insert "of greatest magnitude" after exceedances.

*Weston: The sentence was revised as recommended.*

95. **County of San Diego (TS):** Section ES4.0, Page ES4-3, Figure ES4-5. Probably don't need scatterplots in the Executive Summary.

*Weston: Scatter plots were removed and summarized with text from all E.S. as recommended by other Copermittees.*

96. **County of San Diego (TS):** Section ES4.0, Page ES4-3, 1st paragraph, 4th sentence. County's Dry Weather report indicates no exceedances during 2006.

*Weston: The data submitted by the County of San Diego for the Santa Margarita watershed included three results for turbidity above the action level of 20 NTU (SMG09 at 27 NTU; SMG10 at 31 NTU; and SMG07 at 55 NTU).*

97. **County of San Diego (TS):** Section ES4.0, Page ES4-3, 3rd paragraph, 3rd sentence. Phrasing seems to suggest the opposite of the actual meaning. This comment applies throughout the report.

*Weston: Phrasing was revised for clarity in this and other sections as recommended.*

98. **County of San Diego (TS):** Section ES4.0, Page ES4-5, 1st paragraph, 5th sentence. Replace "implicated" with "indicated".

*Weston: The sentence was revised as recommended.*

99. **County of San Diego (TS):** Section ES4.0, Page ES4-4, 2nd paragraph. Not parallel to the MLS discussion. In both programs, no sampling happened during 2006-07, but the historical MLS results are discussed and ABLM is not.

*Weston: The ABLM discussion was summarized in this format in all WMA executive summaries. The Santa Margarita MLS data were assessed based on available data which included current dry weather and bioassessment data.*

100. **County of San Diego (TS):** Section ES4.0, Page ES4-7. 1st paragraph, 1st sentence. Delete sentence.

*Weston: The sentence was revised as recommended.*

101. **County of San Diego (TS):** Section 5.1.1, Page 5-4. 1st paragraph, 1st sentence. Insert "lands within the" after "or". Change "County" to "County's" and delete "lands".

*Weston: The sentence was revised as recommended.*

102. **County of San Diego (TS):** Section 5.1.2, Page 5-4. 1st paragraph, 3rd sentence. Delete second "reservoir" use.

*Weston: The sentence was revised as recommended.*

103. **County of San Diego (TS):** Section 5.1.3, Page 5-5. Heading. Change heading to "Regulatory Water Quality Challenges".

*Weston: Change was made in this and all WMA sections (see comment #84).*

104. **County of San Diego (TS):** Section 5.1.3, Page 5-5. 1st paragraph, 4th sentence. Change 2003 to 2002.

*Weston: The sentence was revised as recommended.*

105. **County of San Diego (TS):** Section 5.1.3, Page 5-5. 1st paragraph, last sentence. Replace "The" with "Potential". The 303(d) list identifies a different set of potential sources. I would prefer to keep this list more generic.

*Weston: Text was revised as recommended. The potential sources were generalized to indicate both anthropogenic and natural sources.*

106. **County of San Diego (TS):** Section 5.1.3, Page 5-6. 1st paragraph, 3rd sentence. Delete sentence.

*Weston: The sentence was deleted as recommended.*

107. **County of San Diego (TS):** Section 5.1.3, Page 5-6. 1st paragraph, 4th sentence. Delete "have been identified".

*Weston: The sentence was revised as recommended.*

108. **County of San Diego (TS):** Section 5.1.3, Page 5-6. 1st paragraph, 5th sentence. Change "10" to "ten".

*Weston: The sentence is consistent with Weston's numerical description standards and was left unchanged.*

109. **County of San Diego (TS):** Section 5.1.4, Page 5-6. 1st paragraph, 3rd sentence. Replace "represented of" with "in".

*Weston: The sentence was revised as recommended.*

110. **County of San Diego (TS):** Section 5.1.4, Page 5-6. 3rd paragraph, 4th sentence. Replace "mass loading station" with "MLS".

*Weston: The sentence was revised as recommended.*

111. **County of San Diego (TS):** Section 5.1.5, Page 5-7. 2nd sentence. In these descriptions, please move from downstream to upstream or vice versa. Also insert (SLRR-MR) after "the upper site" and (SLRR-BR) after "the lower site".

*Weston: The site codes were added.*

112. **County of San Diego (TS):** Section 5.1.5, Page 5-7. last sentence. Insert (REF-DC) after "a reference site".

*Weston: Text was added as recommended.*

113. **County of San Diego (TS):** Section 5.2, Page 5-7, 1st paragraph, 1st sentence. Change "storm events and" to "storm events as well as". Insert "Copermittees" before 2006 and "jurisdictional" after 2006.

*Weston: The sentence was revised as recommended.*

114. **County of San Diego (TS):** Section 5.2, Page 5-7, 2nd paragraph, 1st sentence. Change "is" to "are". Please search the document to make all verbs related to the word data plural.

*Weston: The sentence and document have been revised as recommended.*

115. **County of San Diego (TS):** Section 5.2.1, Page 5-7, Figure 5-3. This hydrograph needs a short explanation.

*Weston:* Additional text referencing the hydrograph has been added to the text.

116. **County of San Diego (TS):** Section 5.2.1, Page 5-8, 2nd paragraph, 1st sentence. Insert ",and consisted of 0.37 inches of rainfall over an 11-hour period" after 2006.

*Weston: Brief explanation was provided in all WMA sections as recommended.*

117. **County of San Diego (TS):** Section 5.2.1, Page 5-8, 2nd paragraph, 2nd sentence. Delete "antecedent".

*Weston: Text was deleted as recommended.*

118. **County of San Diego (TS):** Section 5.2.1, Page 5-8, 2nd paragraph, 3rd sentence and Table 5-3. Move sentence and Table 5-3 to the end of the first paragraph in Section 5.2.1.

*Weston: This and other sections were revised as recommended.*

119. **County of San Diego (TS):** Section 5.2.1, Page 5-8, 2nd paragraph, 6th sentence. Insert hyphen between six and hour.

*Weston: The sentence was revised as recommended.*

120. **County of San Diego (TS):** Section 5.2.1, Page 5-8, 6th paragraph, 3rd sentence. Did Copermittees really develop? Aren't these taken from Basin Plan, Multi-sector permit, etc.?

*Weston: This and other sections were revised for clarity.*

121. **County of San Diego (TS):** Section 5.2.1, Page 5-8, 7th paragraph, 1st sentence. Insert "from 2006-2007 wet weather monitoring" after results.

*Weston: The sentence was revised as recommended.*

122. **County of San Diego (TS):** Section 5.2.1, Page 5-8, 7th paragraph, 2nd sentence. Delete "of the three" and "monitored during the 2006/2007 storm season".

*Weston: The sentence was revised as recommended.*

123. **County of San Diego (TS):** Section 5.2.1, Page 5-8, 7th paragraph, 5th sentence. Delete "during the first storm".

*Weston: The sentence was revised as recommended.*

124. **County of San Diego (TS):** Section 5.2.1, Page 5-8, 10th paragraph, 5th sentence. Insert "all" after "and were".

*Weston: The sentence was revised as recommended.*

125. **County of San Diego (TS):** Section 5.2.2, Page 5-12, 1st paragraph, 2nd sentence. Replace "compares" with "consists of 1) an identification of". Replace "frequency of" with "frequency at which end". Change "constituents" to "constituent". Insert "has been" after constituents and "at levels" after measured. Replace "statistical" with "2) a statistical analysis of". Change "trend" with "trends". Delete "analyses". Insert "3) a" after "and". Insert "across constituents" after "exceedance".

*Weston: The sentence was revised as recommended.*

126. **County of San Diego (TS):** Section 5.2.2.1, Page 5-12, Header. This title is not intuitive (or accurate). I recommend calling it "Benchmark Exceedance Frequency" or something similar.

*Weston: This comment was addressed as recommended (see also comment #440).*

127. **County of San Diego (TS):** Section 5.2.2.1, Page 5-12, 2nd paragraph, bulleted list. Please identify the frequencies for each.

*Weston: Frequencies were added to each bullet as recommended.*

128. **County of San Diego (TS):** Section 5.2.2.1, Page 5-12, 3rd paragraph, last sentence. Replace "are" with "have". Insert "been measured at" after generally. Insert "levels" after higher.

*Weston: The sentence was revised as recommended.*

129. **County of San Diego (TS):** Section 5.2.2.1, Page 5-12, 6th paragraph. Delete "constituents".

*Weston: The sentence was revised as recommended.*

130. **County of San Diego (TS):** Section 5.2.2.2, Page 5-13, 1st paragraph. I recommend only bringing this up as it is observed for specific constituent groups.

*Weston: Sentence was left for clarity to describe differences between the two tests.*

131. **County of San Diego (TS):** Section 5.2.2.2, Page 5-13, 2nd paragraph. Replace "the" with "statistically".

*Weston: The sentence was revised as recommended.*

132. **County of San Diego (TS):** Section 5.2.2.2, Page 5-13, 3rd paragraph, 2nd sentence. Why is this a range? Shouldn't we know how many NDs have been detected over the period of record?

*Weston: We do know how many NDs occur, but the category for determining Sen's slope falls between 15%-35%. Sen's slopes can only be applied to data with fewer than 15% NDs.*

133. **County of San Diego (TS):** Section 5.2.2.2, Page 5-13, 3rd paragraph, last sentence. Above, it says that Sen's slope is not predictive. Does this have any bearing on making a definitive statement like this?

*Weston: Sen's slope is not predictive, and is a method for displaying the median slope when the data do not qualify as "normal." When data do not pass normality tests, they are classified as "non-parametric". At that point, it is more appropriate to use non-parametric statistics to evaluate the data. The issue with outliers affecting trend results is applicable to using regression analysis to assess trends. Because a non-parametric method for trend analysis was*

*used, the outliers are no longer an issue. However, they can still affect the Sen's slope (which is the median difference between results in the dataset).*

134. **County of San Diego (TS):** Section 5.2.2.2, Page 5-13, 4th paragraph, first sentence. Replace "trend analysis" with "monitoring results".

*Weston: Sentence was revised as recommended.*

135. **County of San Diego (TS):** Section 5.2.2.3, Page 5-15, 1st paragraph, 2nd sentence. Insert "These, along with" before "Mean" to begin the sentence. Insert "over the period of record" after "ratios". Delete "are also displayed".

*Weston: Sentence was revised as recommended.*

136. **County of San Diego (TS):** Section 5.2.2.3, Page 5-15, 1st paragraph, 3rd sentence. Delete "The results of the storms and the mean ratios" and combine the remainder of the sentence with 2nd sentence.

*Weston: Sentence was revised as recommended.*

137. **County of San Diego (TS):** Section 5.2.2.3, Page 5-15, 1st paragraph, 5th sentence. Insert hyphen between six and year.

*Weston: The sentence was revised as recommended.*

138. **County of San Diego (TS):** Section 5.2.2.3, Page 5-15, 1st paragraph, 7th sentence. Change "ration" to "ratio".

*Weston: The sentence was revised as recommended.*

139. **County of San Diego (TS):** Section 5.2.2.3, Page 5-15, 1st paragraph, 10th sentence. Delete "on 10/14/06".

*Weston: The sentence was revised as recommended.*

140. **County of San Diego (TS):** Section 5.2. 3, Page 5-16, 1st paragraph, 7th sentence. Insert "runoff from" after "would be if". Delete "runoff" after "entire event".

*Weston: The sentence was revised as recommended.*

141. **County of San Diego (TS):** Section 5.2. 3, Page 5-16, 6th paragraph, 1st sentence. Change "total dissolved solids" to "TDS".

*Weston: The sentence was revised as recommended.*

142. **County of San Diego (TS):** Section 5.2.4, Page 5-18, 2nd paragraph, 2nd sentence. Change "sample" to "samples". Delete "analysis". Insert "being taken" after "multiple samples". Replace "each" with "certain".

*Weston: The sentence was revised as recommended.*

143. **County of San Diego (TS):** Section 5.2.4, Page 5-18, 2nd paragraph, 3rd sentence. Delete "mass loading station on the San Luis Rey River" to "MLS".

*Weston: The sentence was revised as recommended.*

144. **County of San Diego (TS):** Section 5.2.4, Page 5-20, Table 5-20. Recommend categorizing the analytes in a way that matches with the categories used on the map (Figure 5-6). i.e., what analytes do the categories nutrients and other include?

*Weston: Dry weather analyte categories have been added to the tables. These categories match the lab data categories on the maps.*

145. **County of San Diego (TS):** Section 5.2.4, Page 5-20, 1st paragraph, 1st sentence. Delete "the" after "measured above"

*Weston: The sentence was revised as recommended.*

146. **County of San Diego (TS):** Section 5.2.5, Page 5-20, 1st paragraph, 2nd sentence. Replace "meets" with "meet". Insert "criteria" after "acceptability". Replace "are" with "were".

*Weston: The sentence was revised as recommended.*

147. **County of San Diego (TS):** Section 5.2.6, Page 5-20, 1st paragraph, 1st sentence. Replace "Total dissolved solids" with "TDS".

*Weston: The sentence was revised as recommended.*

148. **County of San Diego (TS):** Section 5.2.6, Page 5-20, 1st paragraph, 5th sentence. Insert commas after "Other constituents" and "Diazinon".

*Weston: The sentence was revised as recommended.*

149. **County of San Diego (TS):** Section 5.2.6, Page 5-20, 1st paragraph, last sentence. Replace "mass loading station" with "MLS".

*Weston: The sentence was revised as recommended.*

150. **County of San Diego (TS):** Section 5.3, Page 5-21, 1st paragraph, 2nd sentence. This discussion should move from downstream to upstream or vice versa.

*Weston: Our bioassessment format for the report was north to south, upstream to downstream, and reference site. Changing this order will be considered for future reports.*

151. **County of San Diego (TS):** Section 5.3.1, Page 5-23, 2nd paragraph, 2nd sentence. Replace "mass loading station" with "MLS".

*Weston: The text was changed as recommended.*

152. **County of San Diego (TS):** Section 5.3.1, Page 5-24, 2nd paragraph, 2nd sentence. This phrasing is counterintuitive. Please state a different way. This comment applies to the rest of the bioassessment section.

*Weston: The phrasing was changed throughout report to be more intuitive.*

153. **County of San Diego (TS):** Section 5.3.1, Page 5-26, 4th paragraph. Replace "mass loading station" with "MLS". Replace "total dissolved solids" with "TDS".

*Weston: The text was changed.*

154. **County of San Diego (TS):** Section 5.3.1, Page 5-26, 4th paragraph, last sentence. Delete "may".

*Weston: The text was changed.*

155. **County of San Diego (TS):** Section 5.3.1, Page 5-29, last paragraph. Replace "mass loading station" with "MLS".

*Weston: The text was changed.*

156. **County of San Diego (TS):** Section 5.4.1, Page 5-31, 2nd paragraph, 3rd sentence. Delete "Criteria No. 1 is". Replace "mass loading station" with "MLS. Combine with 2nd sentence.

*Weston: The acronym for mass loading station was inserted. The sentence was not revised because the existing language was used to provide consistency throughout the document.*

157. **County of San Diego (TS):** Section 5.4.1, Page 5-31, 2nd paragraph, 6th sentence. Delete "Criteria No. 4 is:" and combine with 5th sentence. Insert a colon after Criterion # 4.

*Weston: The sentence was not revised because the existing language was used to provide consistency throughout the document.*

158. **County of San Diego (TS):** Section 5.4.1, Page 5-31, 3rd paragraph, 1st sentence. Delete "which" and "include". Insert colon after "occurrence".

*Weston: The sentence was revised.*

159. **County of San Diego (TS):** Section 5.4.1, Page 5-31, 3rd paragraph, 2nd sentence. Replace period with a colon to combine with 3rd sentence. Delete "Criterion No. 8 is" in the third sentence.

*Weston: The sentence was not revised because the existing language was used to provide consistency throughout the document.*

160. **County of San Diego (TS):** Section 5.4.1, Page 5-31, 5th paragraph, 2nd sentence. Replace "10/14/06" with "October 14, 2006".

*Weston: The sentence was revised as recommended.*

161. **County of San Diego (TS):** Section 5.4.2, Page 5-34, 2nd paragraph, 3rd sentence. Insert "either" after "evidence of". Replace "water quality objective" with "WQO". Replace ", no evidence of" with "or". Insert a period after "persistent toxicity" and replace "and" with "There are" to begin the new sentence.

*Weston: The sentence was revised as recommended.*

162. **County of San Diego (TS):** Section 5.4.2, Page 5-34, 2nd paragraph, 4th sentence. Replace "eminently" with "imminently".

*Weston: The sentence was revised as recommended.*

163. **County of San Diego (TS):** Section 5.4.3, Page 5-34, 2nd paragraph, 1st sentence. Insert hyphen between "long" and "term".

*Weston: The sentence was revised as recommended.*

164. **County of San Diego (TS):** Section 5.5, Page 5-34, 2nd paragraph, 2nd sentence. Insert "the" after "toxicity in".

*Weston: The sentence was revised as recommended.*

165. **County of San Diego (TS):** Section ES5.0, Page ES5-1, Header. Delete "Introduction".

*Weston: The header was deleted from all WMA executive summaries as requested.*

166. **County of San Diego (TS):** Section ES5.0, Page ES5-1, 1st paragraph, 1st sentence. Delete "municipal urban runoff" and "conducted by Weston Solution, Inc. on behalf of the San Diego County Municipal Copermittees".

*Weston: Sentence was revised as requested in all WMA executive summaries.*

167. **County of San Diego (TS):** Section ES5.0, Page ES5-1, 2nd paragraph, 2nd sentence. Insert "conducted during the 2006-07 monitoring year" after "activities".

*Weston: The sentence was revised as recommended.*

168. **County of San Diego (TS):** Section ES5.0, Page ES5-1, Figure ES5-1. Recommend adding dry weather monitoring locations or otherwise stating in the text that the dry weather stations are not shown on this map.

*Weston: Clarification was added to the WMA executive summaries as recommended.*

169. **County of San Diego (TS):** Section ES5.0, Page ES5-2, 2nd paragraph, 2nd sentence. Delete "highest" and insert "of greatest magnitude" after "exceedances".

*Weston: The sentence was revised as recommended.*

170. **County of San Diego (TS):** Section ES5.0, Page ES5-4, Figure ES5-6. Recommend removing from the executive summary.

*Weston: All trend plots were removed from the WMA executive summaries as requested.*

171. **County of San Diego (TS):** Section ES5.0, Page ES5-5, 1st paragraph. Replace "total dissolved solids" with "TDS". This entire paragraph needs some context.

*Weston: Paragraph was revised for clarity as requested.*

172. **County of San Diego (TS):** Section ES5.0, Page ES5-6, Table ES5-2. Re-position this table.

*Weston: Table was repositioned as requested.*

173. **County of San Diego (TS):** Section ES5.0, Page ES5-8, 2nd paragraph, 1st sentence. Delete entire sentence.

*Weston: The sentence was revised as recommended.*

174. **County of San Diego (JW):** Section 4.1.3, Page 4-5, 1st paragraph, last sentence. Insert " / " between "agriculture" and "nurseries".

*Weston: The sentence was revised as recommended.*

175. **County of San Diego (JW):** Section 4.2.2.2, Figure 4-3. Red line shows faint in the printed copy

*Weston: Double checked that WQO Benchmark line easily visible.*

176. **County of San Diego (JW):** Section 4.2.4, Figure 4-5. The map shows exceedances for nutrients but there is no mention of those exceedances earlier in the text….

*Weston: The figure was revised to reflect the exceedances in the table.*

177. **County of San Diego (JW):** Section 4.3.1, Page 4-32, 1st paragraph, last sentence. Change 2006 with 2007.

*Weston: The text was changed.*

178. **County of San Diego (JW):** Section 4.3.1, Page 4-20, 2nd paragraph, last sentence. Not true. According to Fig. 4-7, the May 2007 O/E value was below the 0.8 impairment threshold (O/E appr. = 0.58)

*Weston: This error was corrected.*

179. **County of San Diego (JW):** Section 4.3.1, Page 4-23, 5th paragraph, last sentence. Insert "and October 2004" after "May 2007". Actually, IBI for Oct. 2004 at Willow Glen was much higher…

*Weston: The sentence was reworded..*

180. **County of San Diego (JW):** Section 4.3.1, Page 4-25, 4th paragraph, last sentence. It would be nice to have a graph corresponding to Figs 4-8 and 4-9 also for this reference site.

*Weston: These figures were added.*

181. **County of San Diego (JW):** Section 4.3.2, Page 4-26, 1st paragraph, last sentence. Please, in a sentence or two, discuss the reference site and how the results there relate to the remaining two sites.

*Weston: Text was added discussing this issue.*

182. **County of San Diego (JW):** Section 5.2.2.2, Page 5-14, Figure 5-4. Some of the red lines show up very faint in the printed version.

*Weston: Made WQO Benchmark line thicker and reinserted BOD trend plot.*

183. **County of San Diego (JW):** Section 5.3.1, Page 5-33, 2nd paragraph, 3rd sentence. Please, explain (possible reasons)

*Weston: This discrepancy between the IBI and O/E indices is due to the O/E weighting for overall diversity. This was added to the section for clarification.*

184. **County of San Diego (JW):** Section 5.3.1, Page 5-29, 5th paragraph, last sentence. It would be nice to have a figure corresponding to 5.9 and 5.10 also for the reference site.

*Weston: These figures were added.*

185. **County of San Diego (JW):** Section 5.4.2, Page 5-34, Table 5-11. How about the introduced species?

*Weston: See comment #:186.*

186. **County of San Diego (JW):** Section 5.4.2, Page 5-34, 2nd paragraph, last sentence. How about the role of the non-native/ introduced species?

*Weston: We are unsure of the impact of non-native organisms (esp. fish & crayfish) on native macroinvertebrate populations. Anecdotally, we think they do but we lack scientific data on local streams. Invasive vegetation such as Arrundo might have an impact and this would be considered physical habitat disturbance. Current Arrundo/invasive plant removal projects in North San Diego County may help us define this better in the future.*

187. **County of San Diego (JW):** Section 5.5, Page 5-34, 2nd paragraph, 2nd sentence. How about the introduced/ non-native species?

*Weston: Same response as above, it is too uncertain to name invasive spp. as a cause of impairment.*

188. **County of San Diego (JW):** Section 12.0, Table of Contents, List of Figure, Figure 12-12. Format change, Field code change.

*Weston: Captions were cross referenced during final report production.*

189. **County of San Diego (JW):** Section 12.2.1, Page 12-8, Table 12-3. Table does not show up in MS Word version. Also, please change WQO for Fecal Coliform from 4000 to 400.

*Weston: The tables are not in the Word versions of the report and are inserted separately.*

*The WQO for the lower reaches of the Tijuana River where the MLS is located (Hydrologic Unit 11.11) have Rec-2 beneficial use designations. For Rec-2 beneficial uses, the San Diego Basin Plan (September 8, 1994) applies a WQO of 4000 MPN/100mL. Section 3.4.1 details specific methods as to how water quality objectives are defined in the San Diego County Copermittee program as benchmarks for comparison to monitoring results and do not necessarily reflect regulatory compliance for municipal storm water discharges.*

190. **County of San Diego (JW):** Section 12.2.1.1, Page 12-10, Table 12-4. Does not add up to 0.91…

*Weston: Text revised to reflect the second storm event occurred on January 30, 2007. Rainfall for this event totaled 0.08 inches.*

191. **County of San Diego (JW):** Section 12.2.1.2, Page 12-11, 2nd paragraph, 3rd sentence. Change "4000" to "400".

*Weston: The WQO for the lower reaches of the Tijuana River where the MLS is located in Hydrologic Unit 11.1 and have Rec-2 beneficial use designations. For Rec-2 beneficial uses, the San Diego Basin Plan (September 8, 1994) applies a WQO of 4000 MPN/100mL. Section 3.4.1 details specific methods as to how water quality objectives are defined in the San Diego County Copermittee program as benchmarks for comparison to monitoring results and do not necessarily reflect regulatory compliance for municipal storm water discharges.*

192. **County of San Diego (JW):** Section 12.2.5, Page 12-23, 1st paragraph, 3rd sentence. Delete "the" after "WQO during".

*Weston: Text was revised.*

193. **County of San Diego (JW):** Section 12.3.1, Page 12-30, 1st paragraph, 3rd sentence. Please, explain (possible reasons)

*Weston: A possible explanation was added: O/E is based more on diversity than IBI, and IBI gets "quirky" when the diversity is extremely low, as in TJ River.*

194. **County of San Diego (JW):** Section 12.4, Page 12-32, 1st paragraph, 1st sentence. Replace "three" with "two".

*Weston: Text revised.*

195. **Port of San Diego:** In the main executive summary (pgES-25), the Program Review section reads somewhat confusing. The initial paragraphs refer to the Core Management Questions as if the reader is already aware of what they are. Then, on the following page, the questions are described. It is recommended that the order of that section be revised to start with information on what/why the questions are being used and then followed with the information in the (currently) initial paragraphs.

*Weston: Section was revised as recommended by this and other comments (See comment #356).*

196. **Port of San Diego:** For each Watershed's executive summary, it is recommended to arrange the section in a discussion-style format. This may include a brief summarization of the overall monitoring efforts occurring within each particular watershed and the monitoring results; a synopsis of what the monitoring data reveals about the water quality of the watershed; and how the Copermittees will use the information to develop and assess their WURMP programs. One suggestion would be to present the information in a manner similar to the Main Executive Summary.

In addition, many of the figures (i.e., hydrographs and scatter plots) could be replaced by summarizations of the information obtained from the figures and what they reveal about water quality. A reference could be made that this information is discussed in greater detail later in each Watershed's section.

*Weston: The format of the WMA executive summaries was discussed during the Watershed Leads Meeting. The WMA sections were revised based on these and other comments received. While the summary hydrographs were left in the WMA executive summaries, the trend plots were removed.*

197. **Port of San Diego:** Please include a table of the relevant data sets used to assess the water quality within the WMA for the year and the date range the data was collected. (e.g., DWM; May 2006 – September 2006). It is also recommended that for watersheds having multiple sub-watersheds, the relevant data sets for each sub-watershed are identified. This could be accomplished by adding an extra column to the aforementioned table.

*Weston: A table of the data used to assess each watershed was added to the introductory paragraph of each WMA data assessment section.*

198. **Port of San Diego**: The report does a thorough job of explaining the results from each individual monitoring program. However, there is little information on how the individual programs synch to provide an overall assessment of conditions within the watershed. For example, there is no explanation of how the stormdrain monitoring can support (or does not support) the receiving water monitoring. Additionally, with the exception of the LTEA table, it also does not provide information on where the greater incidence of problems may occur. Where possible, please identify how the different monitoring program information can be correlated with each other to provide more of an overall evaluation of water quality within each WMA (or sub-watershed). It is also suggested that the report include some general, yet overarching, concluding statements on whether problems are getting better or worse and where the problems seem to be most likely.

*Weston: A discussion and table were added to the watershed assessment section to correlate individual program information and annual COC priority assessments to overall WMA evaluations.*

199. **Port of San Diego:** Including a table identifying how each of the monitoring programs addresses the core monitoring questions would be beneficial in each of the WURMP executive summary templates.

*Weston: This change will be considered for future monitoring reports based on conversations with the WURMP Leads at this time as formats and content have not been thoroughly discussed.*

200. **Port of San Diego:** Add discussions to the dry weather data portions in each watershed section (both for the WMA exec summary and the detailed portion) on where the exceedances for each constituent are located in the watershed. In other words, how many are upstream and how many downstream of the MLS. This could then provide some indication of whether we would expect to see the exceedance reflected in the MLS data.

*Weston: Discussion was added to each dry weather section to assess general exceedance patterns in the WMA. A more detailed assessment that analyzes dry weather exceedance patterns in order to relate them to wet weather data will require additional dry weather data and analysis and is beyond the scope of this report at this time.*

201. **Port of San Diego:** Restate in Otay Watershed portion of San Diego Bay Watershed there is not a MLS located in this watershed, and the assessment is based on Dry Weather monitoring data analysis.

*Weston: Additional text was added in the Otay section to indicate the MLS was removed after the 2001-2001 monitoring season.*

202. **Port of San Diego:** It is recommended that a conclusions section be added to each watershed's executive summary. This could include a discussion on the COCs for each watershed, whether the priority status of individual constituents varied from previous

years, and what the trends of these constituents suggest about water quality and current and future watershed management programs. Other information that could be useful would include 1) how information on increasing or decreasing trends relates to known sources, 2) Whether the monitoring efforts are adequate or appropriate to address the high priority water quality problems, and 3) (to the extent possible) how the monitoring data relates to the Core Monitoring Questions.

Weston: *A discussion and table were added to the watershed assessment section to correlate individual program information and annual COC priority assessments to overall WMA evaluations in the San Diego Bay WMA section.*

203. **City of San Diego:** Section ES.7.0, Page ES 7-2, Table ES 7-1: Toxicity test are usually 80% survival, why 100% here?

*Weston: The benchmark water quality objective is 100% for the no observed effect concentration. This is slightly different than expressing toxicity as 80% mortality, or significantly different from the control organisms which some programs use.*

204. **City of San Diego:** Section ES.7.0, Page ES 7-3, last sentence: Consider CWA aqueduct water line flushing? So 15% were NDs and yet we are above the WQO? Please explain.

*Weston: Language from Methods Section (Section 3.5) added to clarify trend analysis.*

205. **City of San Diego:** Section ES.7.0, Page ES 7-4, Figure ES7-6. WQO line (TKN and Total Nickel figures identified)?

*Weston: The text states TKN does not have a WQO.*

206. **City of San Diego:** Section ES.7.0, Page ES 7-5, 2nd paragraph, 2nd sentence: Where 2005 and 2006?

*Weston: Text was revised to indicate October 2004 was the highest O/E score for the site.*

207. **City of San Diego:** Section 7.0, Page 7-1, 1st bulleted list: Use acronym for watershed management area.

*Weston: Text revised.*

208. **City of San Diego:** Section 7.2.1, Page 7-7, last paragraph, first three sentences: If storm moved into the region on 2/18 would it have been gone by the 20th?

*Weston: Field notes indicate rain initiated at approximately 22:00 on February 18, 2007 and scattered showers persisted through February 19, 2007. Most precipitation occurred on February 20, 2007 and ended at approximately 06:00 February 20, 2007.*

209. **City of San Diego:** Section 7.0, Page 7-13, first paragraph: And it tells us what? How is it used?

*Weston: Text was added to each section to point the reader to Appendix C where a table of trend results, S values and critical values can be found.*

210. **City of San Diego:** Section 7.0, Page 7-13, 4th paragraph, 2nd sentence: What's normal – give some reference (referring to a S value of 58).

*Weston: Text was added to each section to point the reader to Appendix C where a table of trend results, S values and critical values can be found.*

211. **City of San Diego:** Section 7.2.3.2, Page 7-13, 4th paragraph, end of 2nd sentence: Again – why 15% ND and an increasing trend. Explain or reference a page where it is explained.

*Weston: Text was added to each section to point the reader to Appendix C where a table of trend results, S values and critical values can be found.*

212. **City of San Diego:** Section 7.3.1, Page 7-22, 1st paragraph: Does this include seasonal variations?

*Weston: Text was revised to indicate this does include seasonal variations.*

213. **City of San Diego:** Section 7.3.1, Page 7-24, last sentence of 1st paragraph: Did this coindend (coincide?) with a CWA water release?

*Weston: Comment noted.*

214. **City of San Diego:** Section 7.3.2, Page 7-28, 2nd paragraph, 2nd and 4th sentence: Why only 2004 mentioned in this sentence? Compared to what in the last year?

*Weston: Text was revised to indicate October 2004 was the highest O/E score for the site*

215. **City of San Diego:** Section 7.4.1, Page 7-31, Figure 7-11: Good!

*Weston: Comment noted.*

216. **City of San Diego:** Section ES 8.0, Page ES 8-3, Figure ES 8-6: No lines – add or drop box (referring to legend).

*Weston: All scatter plots removed from Executive Summaries*

217. **City of San Diego:** Section ES 8.0, Page ES 8-4, Table ES 8-2: San Diego is different, see ES7-4 – let's make them consistent.

*Weston: Table 8-2 headings and order of columns changed to same format as ES7-2.*

218. **City of San Diego:** Section ES 8.0, Page ES 8-5, First paragraph: Strikeout has in the first and third sentence.

*Weston: The text was changed as recommended.*

219. **City of San Diego:** Section ES 8.0, Page ES 8-6, First paragraph: Add comma and correct spelling.

*Weston: The text was changed as recommended.*

220. **City of San Diego:** Section 8.1.2, Page 8-4, Table 8-1: Footnote within table is hard to see, please bold.

*Weston: The footnote was bolded.*

221. **City of San Diego:** Section 8.2.2.1, Page 8-11, 1st and 2nd paragraphs: strikeout have in have had uses.

*Weston: The text was changed as recommended.*

222. **City of San Diego:** Section 8.2.2.2, Page 8-12, 1st paragraph, 3rd sentence: Reference as to why the Mann-Kendall does not assume a single distribution as an advantage? Why? So you can evaluate a smaller data set?

*Weston: The advantage is so that outliers do not skew the statistical results.*

223. **City of San Diego:** Section 8.2.2.2, Page 8-12, 2nd paragraph, last sentence: What is the Sen's slope used for?

*Weston: The Sen's slope indicates how much the median results are changing over time up to the time of the last data point. Though not statistically predictive, it does give an indication as to how change over time may continue based on what has happened to that point.*

224. **City of San Diego:** Section 8.2.2.2, Page 8-12, 5th paragraph, 1st sentence and Figure 8-4: Where's the green line? If not shown, is it significant? Appears the two methods are conflicting with each other.

*Weston: There is no green line on the scatter plot for total nickel because the proportion of NDs was greater than 15%. However, it was still possible to test the data for trend, and this was complete. It is not accurate to plot a Sen's slope estimate if the proportion of NDs is greater than 15%.*

225. **City of San Diego:** Section 8.2.7, Page 8-20, 1st paragraph, last sentance: Add the word most.

*Weston: The text was changed as recommended.*

226. **City of San Diego:** Section 8.3.1, Page 8-22, 1st paragraph, last sentence: This is good or bad?

*Weston: A loss of biodiversity is generally regarded as bad. Text was added to clarify this point.*

227. **City of San Diego:** Section 8.5.1, Page 8-28, 1st paragraph, last sentence: Change exceed to exceeded.

*Weston: The text was changed.*

228. **City of San Diego:** Section 8.5.1, Page 8-28, 2nd paragraph, last sentence: Change is to was.

*Weston: The text was changed as recommended.*

229. **City of San Diego:** Section 8.5.2, Page 8-31, 2nd paragraph, 2nd sentence: I know it needs to be said, however, this may cause some irritation. How about… Actions should be considered for implementation in the future.

*Weston: The text was revised as recommended.*

230. **City of San Diego:** Section 8.6, Page 8-33, 2nd paragraph: Antidegradation policy 68-12.

*Weston: Comment noted. As stated by the State Water Resources Control Board in Resolution 68-16. "The state and federal antidegradation policies do acknowledge that an activity that results in a minor water quality lowering, even if incremently small, can result in violation of antidegradation policies through cumulative effects, especially when the waste is a cumulative, persistent, or bioaccumulative pollutant." The monitoring workgroup may need to consider if antidegradation needs to be specifically evaluated, and to what degree.*

231. **City of San Diego:** Section ES9.0, Page ES9-2: Font size is different.

*Weston: The font size was corrected to be consistent throughout the executive summary.*

232. **City of San Diego:** Section ES9.0, Page ES9-6, 2nd sentence: Replace "and do" with "that does".

*Weston: The text was changed as recommended.*

233. **City of San Diego:** Section 9.1.3, Page 9-5, 1st paragraph, 4th sentence: Except for Cholas.

*Weston: The text was changed; added "With the exception of Chollas Creek" to the beginning of the sentence.*

234. **City of San Diego:** Section 9.1.3, Page 9-5, 1st paragraph, last sentence: We're the only municipality.

*Weston: The text was revised. Last sentence of paragraph was deleted.*

235. **City of San Diego:** Section 9.1.4, Page 9-5, 2nd paragraph, last sentence: Is this needed here?

*Weston: The text was not changed. Weston felt the description of observations of persistent trash at the site was relevant to the site description.*

236. **City of San Diego:** Section 9.2.2.1, Page 9-5, 5th paragraph: Delete "have" in the first sentence. Change "has been" to "were" and "has been" to "was" twice in the fourth sentence.

*Weston: The text was changed as recommended.*

237. **City of San Diego:** Section 9.2.2.2, Page 9-16, 2nd paragraph, last sentence: Sen's slope question...What does this tell us?

*Weston: The Sen's slope indicates how much the median results are changing over time up to the time of the last data point. Though not statistically predictive, it does give an indication as to how change over time may continue based on what has happened to that point. (Also, see comment #223).*

238. **City of San Diego:** Section 9.2.2.2, Page 9-17, Figure 9-4: Where's the WQO (referring to the enterococci figure)?

*Weston: There is no WQO Benchmark for enterococci wet weather data.*

239. **City of San Diego:** Section 9.2.2.3, Page 9-19, second paragraph: Move comma to after 1998?

*Weston: The text was changed as recommended.*

240. **City of San Diego:** Section 9.2.5, Page 9-24: Could DEH's beach bacti data be considered? Where's MB Irrigation? How about ASBS work?

*Weston: The inclusion of this data was outside Weston's scope of work for this report.*

241. **City of San Diego:** Section 9.5.1, Page 9-32, 2nd and 4th paragraphs: Change "is" to "was" in four instances.

*Weston: The text was changed as recommended.*

242. **City of San Diego:** Section 9.5.1, Page 9-33, first paragraph: Change "is" to "was" in two instances.

*Weston: The text was changed as recommended.*

243. **City of San Diego:** Section 9.5.1, Page 9-35, 1st and 2nd paragraphs: Change "is" to "was" in two instances.

*Weston: The text was changed as recommended.*

244. **City of San Diego:** Section 9.5.2, Page 9-36, 2nd paragraph: Change "is" to "was".

*Weston: The text was changed as recommended.*

245. **City of San Diego:** Section 9.5.3, Page 9-37, 3rd paragraph: Change "is" to "was" in four instances.

*Weston: The text was changed as recommended.*

246. **City of San Diego:** Section 9.5.3, Page 9-38, 2nd paragraph: Revise sentence to indicate Mission Bay WMA.

*Weston: The text was revised. Sentence was corrected to "Mission Bay WMA"*

247. **City of San Diego:** Section 9.6, Page 9-39, 5th paragraph: Delete has in two instances.

*Weston: The text was changed as recommended.*

248. **City of San Diego:** Section 9.6, Page 9-39, 7th paragraph: It is just the City in MB.

*Weston: The text was revised to indicate the City of San Diego.*

249. **City of San Diego:** Section ES10.0, Page ES10-4, Figure ES10-6: WQO (Referring to Dissolved Copper figure)?

*Weston: Dissolved copper WQO Benchmarks are specific to each sample, as they are based on sample hardness. All scatter plots were removed from Executive Summaries*

250. **City of San Diego:** Section 10.1.2, Page 10-4, Table 10-1: Please bold the 1 (referring to table's footnote). I almost missed it.

*Weston: The text was changed as recommended.*

251. **City of San Diego:** Section 10.2.1.2, Page 10-11, 3rd paragraph: Delete "but".

*Weston: The text was changed; sentence was added.*

252. **City of San Diego:** Section 10.2.2.1, Page 10-12, 4th paragraph: Add commas after pyrethroids and Chlorpyrifos.

*Weston: Comment acknowledged; the text was not changed.*

253. **City of San Diego:** Section 10.2.2.2, Page 10-13, 2nd paragraph: And tell us what? What is its use?

*Weston: Updated the text to include: "This is a non-parametric estimate of slope (change per unit time).*

254. **City of San Diego:** Section 10.2.2.2, Page 10-14, Figure 10-4: WQO (Referring to dissolved copper)?.

*Weston: There is no WQO Benchmark because the WQO Benchmark is specific to each sample based on water hardness*

255. **City of San Diego:** Section 10.2.2.3, Page 10-15, 1st paragraph: Change "are" to "were".

*Weston: Comment acknowledged; the text was not changed as it reflects present tense to the reader.*

256. **City of San Diego:** Section 10.4.1, Page 10-32, 1st and 2nd paragraphs: Change "is" to "was" in four instances.

*Weston: The text was changed as recommended.*

257. **City of San Diego:** Section 10.4.1, Page 10-32, 3rd paragraph: Change "are" to "were" in three instances.

*Weston: The text was changed as recommended.*

258. **City of San Diego:** Section 10.4.1, Page 10-34, 1st, 2nd, and 3rd paragraphs: Change "is" to "was" in one instance and "are" to "were" in two instances.

*Weston: The text was changed as recommended.*

259. **City of San Diego:** Section 10.4.2, Page 10-35, 2nd paragraph, 1st sentence: See page 36 comment.

*Weston: No change requested.*

260. **City of San Diego:** Section 10.4.3, Page 10-36, 2nd paragraph, 1st sentence: Where's turbidity that was mentioned on page 35?

*Weston: Turbidity is included in the LTEA ratings calculation for sedimentation. However, the sedimentation category only receives a B rating due to the weighting of the sub-watershed percentages.*

261. **City of San Diego:** Section 10.4.3, Page 10-37, 3rd paragraph, 2nd sentence: Change "are" to "were".

*Weston: The text was changed as recommended.*

262. **City of San Diego:** Section ES11.0, Page ES11-4, Figure ES11-6: WQO? (referring to total copper and total zinc figures).

*Weston: The WQO Benchmark for total copper and total zinc is based on the water hardness of each sample, and is therefore not shown on the graph. All scatter plots were removed from the Executive Summaries*

263. **City of San Diego:** Section ES11.0, Page ES11-5, last paragraph, first sentence: The poor IBI rating is an improvement over the consistently very poor ratings.

*Weston: Comment noted.*

264. **City of San Diego:** Section ES11.0, Page ES11-7, Table ES11-5: Is this a function of time? As the amount of time diazinon has been banned increases this will decline.

*Weston: Yes, this is a function of frequency of exceedances over time. As the number of detections above the WQO decreases, the over total will decrease and will likely become a low frequency of occurrence COC or will likely not be a COC at all in the near future.*

265. **City of San Diego:** Section 11.3.1.1, Page 11-19, 2nd paragraph, 1st sentence: Add commas after metal and copper.

*Weston: Text revised.*

266. **City of San Diego:** Section 11.3.2.2, Page 11-23, 3rd paragraph: And tell us what? How does it help evaluate the data?

*Weston: Mann-Kendall test for trend helps evaluate the data by assessing the number of positive and negative differences between sample results over time. This is a non-parametric method, because it does not incorporate the actual result values. It is valuable because if the trend is assessed using regression analysis, outliers may affect the validity of the trend result.*

267. **City of San Diego:** Section 11.3.2.3, Page 11-28, last paragraph, last sentence: Note Calleguas WER study.

*Weston: Comment noted.*

268. **City of San Diego:** Section 11.3.5, Page 11-34, 3rd paragraph: Why is the 2004-0277 data, Air dep, and LG and LM monitoring not included?

*Weston: The summarization of these programs was not included in the scope of work and it was uncertain whether this data was needed for this annual report. While there is some overlap between these programs, they are separate and distinct from each other. It was assumed these reports would be submitted individually by the City of San Diego.*

269. **City of San Diego:** Section 11.10, Page 11-74, 2nd paragraph: Strikeout "increasing trends for pH and dissolved phosphorus.

*Weston: Comment noted. Data shows statistically significant increasing trends for pH and dissolved phosphorus.*

270. **City of San Diego:** Section 11.11, Page 11-75, Heading: Add space between 11.11 and 2006.

*Weston: Text was revised.*

271. **City of San Diego:** Section 11.12, Page 11-79, Heading: Add space between 11.12 and 2001-2006.

*Weston: Text was revised.*

272. **City of San Diego:** Section ES12.0, Page ES12-4, Figure ES12-6: WQO (Identifying TOC, Total Coliform, Conductivity, Total Lead, Total Zinc, and Dissolved Nickel figures) ?

*Weston: There is no wet weather WQO benchmark for TOC, Total coliform, or conductivity. Total Lead, Total Zinc, and Dissolved Nickel require WQO Benchmarks calculated from the water hardness for each sample.*

273. **City of San Diego:** Section 12.2.2.2, Page 12-13, Figure 12-4: Why is there no line for the WQO (Identifying TOC figure)?

*Weston: There is no wet weather WQO Benchmark for TOC*

274. **City of San Diego:** Section 12.2.2.2, Page 12-14, Figure 12-5: Why is there no line for the WQO (Identifying Total Coliform figure)?

*Weston: There is no wet weather WQO Benchmark for Total coliform*

275. **City of San Diego:** Section 12.2.2.2, Page 12-15, Figure 12-7: Why is there no line for the WQO (Identifying Total Lead, Total Zinc, and Dissolved Nickel figures)?

*Weston: The WQO Benchmark for total lead, total zinc, and dissolved nickel is based on sample water hardness, and is therefore specific to each sample result. This WQO line is not shown in this case since we are evaluating trend rather than relevance to the WQO. We do this for those constituents that lend themselves for this evaluation.*

276. **City of San Diego:** Section 12.5, Page 12-38, 3rd paragraph, 2nd sentence: Survival?

*Weston: Text revised to add clarity to summary and conclusions.*

277. **City of Carlsbad:** General Comments: The report should focus on fulfilling permit requirements, stating the objectives (core questions) and then report out results related to the objectives; similar to a scientific report - objectives, sample design, methods, results, and conclusions.

*Weston: This comment was discussed within the Watershed Leads meeting. The report format will be discussed with the Monitoring Workgroup for future reports.*

278. **City of Carlsbad:** General Comments It appears that we are lumping dissimilar results together as if they were similar, eg. the objectives for the Dry Weather Program are for source ID and illicit connections from the MS4, so this needs to be stated whenever we are discussing Dry Weather results.

*Weston: Several comments were received with similar concerns. Dry weather data does not specifically indicate whether it is collected in the MS4 or receiving waters and not all jurisdictional programs are identical. Also, the dry weather data has a lower impact on determining water quality COCs.*

279. **City of Carlsbad:** General Comments Delineation needs to be made between results in the receiving water and those from storm drains. Also need to specify when results are from wet weather vs. dry weather.

*Weston: See comment above. Also, several comments were addressed to indicate when samples were collected as wet weather or dry weather samples.*

280. **City of Carlsbad:** General Comments All conclusions need to be clear, ie. toxic "in wet weather", not just language about the watershed being toxic as it leads an uneducated reader to the wrong conclusions.

*Weston: Additional language was added where appropriate. It should be noted that the third party SWAMP data indicates toxicity has been identified in ambient monitoring in multiple locations throughout the watershed suggesting toxicity may be an issue in the watershed in both wet and dry weather monitoring.*

281. **City of Carlsbad:** General Comments The scatter plots need explanation as some don't appear to be a significant upward trend as stated in the text, or maybe moved to the main section and not the Executive Summary. For example, Total Nickel trend line looks similar to COD but based on Sens Slope COD is more significant.

*Weston: The Sen's slope estimate is not indicative of the "significance" of the trend. It is merely a non-parametric slope estimate. The value indicated on the plot is the slope of the line. All scatter plots were removed from the Executive Summaries*

282. **City of Carlsbad:** General Comments**:** Language with 'results were > than expected, or < than expected' need to be explained further throughout the document.

*Weston: The discussion of loads in comparison to the NSQD was expanded upon based on this and other comments.*

283. **City of Carlsbad:** General Comments Instead of listing all parameters with a statistically significant upward trend, only list those that are above or near WQOs throughout document.

*Weston: The discussion of trends was revised to indicate relevance to the WQO where appropriate. However, based on other comments, the trend plots were removed from all WMA executive summaries, but left in the main WMA sections.*

284. **City of Carlsbad:** General Comments Clarify between WQOs and benchmarks throughout document.

*Weston: The comparison was revised to indicate "benchmark WQOs" where appropriate throughout the document as recommended.*

285. **City of Carlsbad:** General Comments Capitalize the Coastal Storm Drain Outfall Monitoring Program as it is a formal program.

*Weston: The reference to the Coastal Storm Drain Monitoring Program was capitalized where appropriate. This was only identified in Section 13.*

286. **City of Carlsbad:** Executive Summary, Page ES-1, Last sentence in ES.2.1 add 'by the Copermittees' at the end of the sentence.

*Weston: The text was added as recommended.*

287. **City of Carlsbad, Section 3, Page 3-25:** The dry weather section should include some language describing that the program monitors primarily storm drains and has limited receiving water sites. Generally, the report treats this water quality data the same as receiving water data, albeit with less weight. In order to have a more accurate assessment, dry weather data collected in receiving waters should be compared to other receiving water data. Storm drain samples and exceedances may be discussed elsewhere but should not be used to assess the water quality in the receiving waters. This concern is applicable to later sections of the report.

*Weston: As noted in the response to comment 7, depending upon the Copermittee, dry weather sites may be either storm drains or receiving waters. The data reporting whether a site is a storm drain or receiving water is not currently included in the data submittal, and should be added in the future.*

288. **City of Carlsbad, Section 3, Page 3-26:** The DW data used in this report should be 2006 data. Near the bottom of 3-26, 2005 is stated.

*Weston: Updated text to 2006*

289. **City of Carlsbad, Section 3, Page 3-39;** As stated in the discussion, measured storm loads often represent the first flush only due to the sampling protocols. How are the measured loads adjusted to account for the remainder of the storm? Using the EMC for the portion of the storm sampled and extrapolating that to estimate the loading across the storm may not be representative if the EMC is assumed constant throughout the event. Using the EMC calculated from the rising arm and peak of the hydrograph may overestimate the pollutant concentrations at the back end of the hydrograph and result in an overestimation of the loads. Where a minimum fraction of the storm is captured, this may be valid; however in cases where only a small portion of the storm is sampled, this may not be representative of true conditions.

*Weston:* The sampling design of this monitoring program was designed to assess urban runoff. Samples are collected to represent the constituent concentrations associated with storm water runoff (i.e., rising hydrograph), and not the concentrations associated with flows recharged from storage in the watershed (i.e., falling hydrograph). As discussed in Section 3, the MLS samples are collected as a flow-weighted composite. These composite samples consist of a mixture of sub-samples collected in proportion to the stream flow rate. In other words, as the flow increases more sub-samples are added to the composite. Any sub-sampling that may have occurred prior to the rise in the flow rate would have been collected at a relatively slow pace. After the peak flow has passed and the flow subsides, the pace of sub-sampling also slows. Sample compositing is typically halted at this point since most of the flow is no longer associated with storm water runoff, but is associated with watershed storage.

A load estimate based on a flow-weighted composite is more representative of true storm loads than load estimates based on a single grab-sample. However, loads can be more accurately estimated by collecting multiple grab samples over the full length of the hydrograph (i.e., pollutograph). The disadvantage to this approach is cost since lab analysis is needed for each grab sample. Another approach would be to limit the compositing time.

290. **City of Carlsbad, Section 6, Page ES6-1:** Second sentence under Watershed Monitoring; please add “Locations in" in front of “two watersheds” as the whole watersheds weren't monitored.

*Weston: Text was revised.*

291. **City of Carlsbad, Section 6, Page ES6-2:** Sentence prior to table ES6-1 sounds like the WQOs are in bold, when in fact it's the exceedances that are in bold, so put (in bold) just after “constituents” on first line.

*Weston: Text was revised.*

292. **City of Carlsbad, Section 6, Table ES6-1:** Please check the BOD data for accuracy. Seldom does BOD exceed the WQO and it seems strange that the same storm also exceeded for Escondido Creek. Also please check and provide the WQO for the total copper exceedances. A table of appropriate hardness based WQO would provide clarification. This would be very helpful in the methods section. The LC50 and NOECs as displayed seem counter-intuitive - the 100s should be bolded and not the 25s and 77.11 results. Add a footnote or if correct please explain.

*Weston: Original laboratory EDD data for BOD double-checked; results of 49.4* mg/L *for Aqua Hedionda Creek and 33.1 mg/L for Escondido Creek were reported. Text indicates WQO exceedances are indicated by bold font. Therefore LC50% and NOEC% that are less than 100% are bolded. Appendix K has been added to include a table of hardness-based WQOs for metals.*

293. **City of Carlsbad, Section 6, Table ES6-2:** Explain listing exceedances for conductivity as the WQO listed is Best Professional Judgment. It may be helpful to list the WQO in the table. The “28” is inconsistent with same data in Table 6-8.

*Weston: Text revised to indicate WQO is "best professional judgment" per Section 3, Table 3-8. Table ES6-2 revised to indicate 2 exceedances inline with Section 6.*

294. **City of Carlsbad, Section 6, Page ES6-5, Stream Bioassessment:** Buena Vista River should be Buena Vista Creek for consistency. The last 2 sentences seem out of place.

Weston: *Text was revised*

295. **City of Carlsbad, Section 6, Page ES6-6, WMA Assessment:** Second bullet, add "during wet weather" to read "Evidence of persistent toxicity during wet weather". The list of long term increasing trends should be delineated into those above or approaching WQO and those below WQO. As is, they all appear to be significant problems, where due to low concentrations; some may actually be less of a priority. This comment is applicable in all places in the report listing the increasing trends in Agua Hedionda Creek Watershed.

*Weston: Text was revised to include "during wet weather". Text was revised to distinguish trends approaching or above the WQO verses those that have infrequently or never been above WQO.*

296. **City of Carlsbad, Section 6, Page ES6-7, Recommendations:** Sentence below should replace "watershed" with "hydrologic unit" to read, "The new permit monitoring order (R9-2007-01) calls for two temporary watershed assessment stations (TWAS) for this hydrologic unit along…"

*Weston: Text was revised.*

297. **City of Carlsbad, Section 6, Table ES6-5:** Please check the BOD data for accuracy. Seldom does BOD exceed the WQO and it seems strange that the same storm also exceeded for Agua Hedionda Creek. Also please check and provide the WQO for the total copper exceedances. A table of appropriate hardness based WQO would provide clarification, perhaps in the methods section.

*Weston: Original laboratory EDD data for BOD double-checked; results of 49.4* mg/L *for Agua Hedionda Creek and 33.1 mg/L for Escondido Creek were reported. Appendix K has been added to include a table of hardness-based WQOs for metals.*

298. **City of Carlsbad, Section 6, Table ES6-6:** Explain listing exceedances for conductivity as the WQO listed is Best Professional Judgement. It may be helpful to list the WQO in the table. The exceedances for conductivity (28) do not match the number (2) listed in Table 6-8.

*Weston: See comment # 294.*

299. **City of Carlsbad, Section 6, Page 6-4, 6.1.2 Beneficial Uses:** Second sentence, the hydrologic unit contains five coastal lagoons if Loma Alta is included, Batiquitos Lagoon is missing as written.

*Weston: Text was revised.*

300. **City of Carlsbad, Section 6, Table 6-2:** This table would be better organized if sorted by HSA# which would group associated water bodies.

*Weston: Text was revised.*

301. **City of Carlsbad, Section 6, Page 6-5:** Second sentence should read, "Four of five lagoons…*are* on the 303(d) list." Next sentence should read, "Each *impaired* lagoon is also identified…" In the third paragraph addressing the Bacti I TMDL, "several municipalities have been identified" is incorrect. Encinitas is the only municipality responsible for the TMDL at Moonlight State Beach.

*Weston: Text was revised.*

302. **City of Carlsbad, Section 6, Page 6-12:** Fourth paragraph states that the results for the four pyrethroids were all below WQO. Later in the paragraph, there is a statement that reads, "There are no WQO benchmarks for synthetic pyrethroids." Contradictory, please clarify.

*Weston: Text was revised.*

303. **City of Carlsbad, Section 6, Page 6-13:** The last sentence states that it is likely that synthetic pyrethroids are the causative agent of the toxic responses seen in both species. Is this true? It seems the *Hyalella* has shown toxic response to pyrethroids and appears the exceedances for OP Pesticides may be to blame for the toxic response in *Ceriodaphnia sp*.

*Weston: Text was revised for clarity.*

304. **City of Carlsbad, Section 6, Section 6, Table 6-5:** The footnotes (first and third) are contradictory concerning WQO for pyrethroids.

*Weston: Text revised in the table for clarity.*

305. **City of Carlsbad, Section 6, Page 6-14, 6.2.4:** First sentence, "San Dieguito River MLS" should be "Agua Hedionda Creek MLS".

*Weston: Text was revised.*

306. **City of Carlsbad, Section 6, Page 6-14, 6.2.4.1:** Paragraph 1, please reword last two sentences to read, "Other conventional constituents that have had concentrations measured above their respective WQO include COD and BOD in 19% and 11% of the samples collected during storm events since 1998-1999, respectively." Paragraph 3, please remove the last sentence.

*Weston: Text was revised.*

307. **City of Carlsbad, Section 6, Page 6-15, 6.2.4.2:** The list of long term increasing trends should be delineated into those above or approaching WQO and those below WQO. As is, they all appear to be significant problems where due to low concentrations, some may

actually be less of a priority. This comment is applicable in all places in the report listing the increasing trends in Agua Hedionda Creek Watershed.

*Weston: Text was revised (see comment #296).*

308. **City of Carlsbad, Section 6, Table 6-7:** Should the conductivity units be µS/cm instead of mS/cm? The DW Action Level for turbidity is BPJ, should this be footnoted?

Weston: *Units revised to µS/cm.*

309. **City of Carlsbad, Section 6, Table 6-8:** Explain listing exceedances for conductivity as the WQO listed is Best Professional Judgment. It may be helpful to list the WQO in the table. The exceedances for conductivity (2) do not match the number (28) listed in Table ES6-6.

*Weston: See comment #294.*

310. **City of Carlsbad, Section 6, Page 6-23:** In order have a more accurate assessment, dry weather data collected in receiving waters should be compared to other receiving water data. Storm drain samples and exceedances may be discussed but should not be used to assess the water quality in the receiving waters or compared to exceedances in MLS monitoring.

*Weston: Similar comment (see comments #7, 21, and 278).*

311. **City of Carlsbad, Section 6, Page 6-25, 6.2.7:** Last sentence is contradictory to the final recommendations in the report to perform TIEs at AH Creek.

*Weston: Text revised.*

312. **City of Carlsbad, Section 6, Page 6-25, 6.2.8:** Second paragraph, revise last sentence to read, "Metals were generally within the expected range or lower than expected." Last paragraph, same ideas concerning comparison of DW values to MLS monitoring as stated above. A better comparison may be to discuss exceedances during DW in receiving waters and during storm events in receiving waters. DW storm drain samples are not representative of ambient conditions in receiving waters.

*Weston: Text revised to "Metals were generally within the expected range or lower than expected." The later part of this comment appears similar to comment #310 (see also comments #7, 21, and 278).*

313. **City of Carlsbad, Section 6, Page 6-35, 6.2.10.1:** These constituents seem to have a high frequency of occurrence during wet weather and should be qualified as such. Understanding that the diamond rating system does include some DW information, as expressed above it may be misleading. Furthermore, two of the six (TSS and TDS) are not currently monitored during DW.

*Weston: TDS and TSS are monitored during the wet weather monitoring program. However, turbidity is relevant to the watershed assessment process.*

314. **City of Carlsbad, Section 6, Page 6-39, 6.2.11:** The list of long term increasing trends should be delineated into those above or approaching WQO and those below WQO. As is, they all appear to be significant problems, where due to low concentrations, some may actually be less of a priority. This comment is applicable in all places in the report listing the increasing trends in Agua Hedionda Creek Watershed. Third paragraph, last sentence, remove "primarily dissolved lead and zinc" to read, "Metals were within the expected range or lower than expected."

*Weston: Text was revised.*

315. **City of Carlsbad, Section 6, Page 6-42, 6.3.3.1:** Paragraph 2, when were the grab samples collected? Prior to the peak of the hydrograph, as in AH?

*Weston: Text was revised.*

316. **City of Carlsbad, Section 6, Page 6-43, 6.3.3.2:** Un-ionized ammonia is listed to have exceeded WQO. Please explain calculation used to convert ammonia as N to un-ionized ammonia in the methods section. Unable to find this conversion in the report.

*Weston: Description of unionized ammonia calculation is provided in the methods section table of WQOs.*

317. **City of Carlsbad, Section 6, Page 6-46:** Paragraph 1, please add at end of paragraph, "There were no pesticides detected above WQO for any storms monitored during 2006-07."

*Weston: Text was revised.*

318. **City of Carlsbad, Section 6, Page 6-50, 6.3.5:** As stated in the discussion, measured storm loads often represent the first flush only due to the sampling protocols. How are the measured loads adjusted to account for the remainder of the storm? Using the EMC for the portion of the storm sampled and extrapolating that to estimate the loading across the storm may not be representative if the EMC is assumed constant throughout the event. Using the EMC calculated from the rising arm and peak of the hydrograph may overestimate the pollutant concentrations at the back end of the hydrograph and result in an overestimation of the loads. Where a certain fraction of the storm is captured, this may be valid; however in cases where only a small portion of the storm is sampled, this may not be representative of true conditions.

*Weston: See response to comment 289.*

319. **City of Carlsbad, Section 6, Table 6-17:** Should the conductivity units be µS/cm instead of mS/cm? The DW Action Level for turbidity is BPJ, should this be footnoted?

*Weston: See response to comment 308.*

320. **City of Carlsbad, Section 6, Table 6-18:** Explain listing exceedances for conductivity as the WQO listed is Best Professional Judgment. It may be helpful to list the WQO in the table.

*Weston: The Dry Weather Working Group uses an Action Level of 5000 us/cm. This was agreed upon by the group, and is based on Best Professional Judgment. Added this value to the table.*

321. **City of Carlsbad, Section 6, Page 6-55, 6.3.7:** Only one discharge event occurred during a high flow storm event in 2005. Should this be 2006? The dates would be helpful and allow a comparison to the water quality data. If the discharge occurred during the second storm event sampled on 1/31/07, that may explain exceedances for BOD and ammonia, otherwise attributed to urban runoff. In the paragraph beginning "The permit conditions…" please specify "One sampling event" in the third sentence from the end.

*Weston: The discharge occurred in 2005 as reported from conversation with HARRF Staff. "One event" was clarified to indicate "one quarterly monitoring event…"*

322. **City of Carlsbad, Section 6, Page 6-57, 2007 Third Party Data:** This is a good opportunity to compare wet and dry data in Escondido Creek.

*Weston: Brief description of the WMA assessment COCs was added for comparison to the HARRF data.*

323. **City of Carlsbad, Section 6, Table 6-24:** The DW Action Level for turbidity is BPJ, should this be footnoted?

*Weston: The Action Level for turbidity is 20 NTU, based on the value adopted by the Dry Weather workgroup. This value is based on best professional judgment, but is applicable because it was adopted by the group as the Action Level. Added footnote to each table that the action level was adopted by the dry weather working group, and is based on best professional judgment.*

324. **City of Carlsbad, Section 6, Table 6-25:** How is the average ratio of exceedance for pH calculated? This number doesn't seem meaningful unless all pH exceedances are in one direction.

*Weston: The average ratio of exceedance is calculated using the following method:*
*If the result is greater than 9, then the result is divided by 9. If the result is less than 6.5, then the result is subtracted from 6.5,9 is added, and then divide by 9. If the value is not outside the range (6.5-9), then it is divided by the median value (7.75 pH units)*

325. **City of Carlsbad, Section 6, Page 6-74, 6.6.1; Page 6-81, 6.8:** The WQO stated for nitrate is 400 mg/l. This is incorrect and should be 10 mg/l. Occurs on both pages.

*Weston: Text was revised.*

326. **City of Carlsbad, Section 13, Section 13, Page 13-2:** Total metals, remove "observed" from second to last sentence. Dissolved metals, last sentence. What does "This" refer to? Reword to explain that exceedances in Chollas Creek MLS may be due to low hardness and increased impervious area.

*Weston: Recommended changes were made.*

327. **City of Carlsbad, Section 13, Page 13-17:** Metals discussion, please state whether exceedances are of the CCC or CMC values. Second paragraph, include language delineating whether increasing trends are above or below WQO as the WQO is often not included in the following scatter plots, pages 13-19 through 13-21. Consider adding WQO to these graphs.

*Weston: The total number of samples above WQO benchmarks is derived from counting the number of results above the CCC objective. This avoids double counting (as the CMC objective is larger). The WQO is not included in the scatter plots because the objective is specific to each sample.*

328. **City of Carlsbad, Section 13, Page 13-49:** Include in the DW discussion that monitoring locations are predominantly in the MS4 with few locations in receiving waters.

*Weston: As noted in the response to comment # 7, it is not possible to differentiate between receiving water and storm drain samples as they are currently submitted.*

329. **City of Carlsbad, Section 13, Page 13-61:** Third paragraph, last sentence should be moved up to follow preceding discussion of fecal coliform exceedances. 13.6.6, did the discharge event occur in 2005? Is this relevant to the data we are evaluating?

*Weston: Recommended changes were made. All third party data submitted for presentation in the 2006-2007 monitoring report were included, regardless of what year the data were collected*

330. **City of Carlsbad, Section 14, Page 14-2:** Under Total Metals discussion, we should specify that the metals exceedances were above the CCC threshold and not the CMC threshold if appropriate.

*Weston: Section was revised to indicate CCC and CMC exceedances.*

331. **City of Carlsbad, Section 14, Page 14-3**: Under the Dissolved Metals discussion, the last sentence should be removed. It doesn't seem correct. If it is, please explain. Dissolved metals would not be expected low as impervious area increases.

*Weston: Sentence was clarified to indicate the CTR WQO is low due to the low hardness values found.*

332. **City of Carlsbad, Section 14, Table 14-1:** The list of long term increasing trends should be delineated into those above or approaching WQO and those below WQO. As is, they all appear to be significant problems, where due to low concentrations, some may

actually be less of a priority. This comment is applicable in all places in the report listing the increasing trends in Agua Hedionda Creek Watershed.

*Weston: The discussion of trends was revised to indicate relevance to the WQO where appropriate. However, based on other comments, the trend plots were removed from all WMA executive summaries, but left in the main WMA sections. (See also comment #230 regarding the anti-degradation policy)*

333. **City of Carlsbad, Section 14, Page 14-5:** Metals discussion, were these trends above or below WQO?

*Weston: The trend analysis for metals does not readily lend itself for determining relevance to the WQO because the WQO varies depending on hardness. The WQO ratio graphs are a better measure for comparing the WQO exceedances.*

334. **City of Carlsbad, Section 14, Page 14-6, 14.1.1.2:** There should be some mention of the fact that the majority of dry weather samples were collected in the MS4 and thus are not representative of ambient receiving water conditions.

*Weston: The dry weather data is not specific on whether it is collected in the MS4 or receiving waters (see comments # 17, 21, 278, and 310).*

335. **City of Carlsbad, Section 14, Page 14-11:** Paragraph 2, which trends were above/below WQO? Paragraph 4, how many of the sites were in receiving waters and how many in the MS4?

*Weston: For paragraph 2; COD, TSS, turbidity, and Hyalella trends were described with relevance to the benchmark WQOs. For paragraph 4; See response to comment #334 above.*

336. **City of Carlsbad, Section 14, Page 14-12:** Paragraphs 4 and 8, please specify numbers of samples collected in the storm drain versus receiving waters if possible.

*Weston: See response to comment #334 above.*

337. **City of Carlsbad, Section 14, Page 14-13:** Paragraph 2, the WQO stated for nitrate is 400 mg/l. This is incorrect and should be 10 mg/l. Paragraph 3. Most of the WMA assessment findings agree with the water quality priority ratings with the exception of nutrients. Please mention that the A rating for nutrients (Table 6-26) is due to 303(d) listings and does not appear to be supported by water quality data from the watershed.

*Weston: For paragraph 2; the benchmark WQO for nitrate was corrected to 10 mg/l. Paragraph 3 was revised as recommended.*

338. **City of Carlsbad, Section 14, Page 14-25, Question 2:** Bullet 1, add "during wet weather".3

*Weston: Sentence was revised as recommended.*

339. **City of Del Mar, ES 2.1.2, Page ES-2:** Additional language recommended for clarification (…the MLS, …conventional pollutants).

*Weston: The text was revised by spelling out "the mass loading station". The Copermittee monitoring workgroup has refrained from using the term "pollutant" and was therefore not added. Additionally, some conventional constituents are not considered pollutants (e.g. pH and conductivity), through they may indicate the presence of pollution.*

340. **City of Del Mar, ES 2.4, Page ES-3: …**Dry weather information was assessed from locations upstream of the mass loading stations and compared to wet weather constituents of concern. Is this correct? Aren't dry weather data points compared to action levels and then assessed to see if they correspond to COCs during wet weather? Please clarify terminology used here.

*Weston: The description of dry weather data was revised as recommended.*

341. **City of Del Mar, ES 2.4, Page ES-3:** Revise 2nd paragraph beginning to read…Water quality exceedances were assessed for the frequency of occurrence within each watershed to prioritize COCs as high, medium or low.

*Weston: The sentence was revised as recommended with the exception of the word "prioritize". This word was changed to categorize based on comments from others (see comment #84).*

342. **City of Del Mar, ES 4.1.2, Page ES-4:** Clarify all ES bioassessment descriptions of O/E to read similar as follows…This implies that the benthic community has lost an estimated x% to x% percent of the biodiversity expected to occur at the site. As listed in ES 4.9.2

*Weston: This change was made to all ES sections*

343. **City of Del Mar, ES 4.1.4, Page ES-5:** In the 1st paragraph, Is this for 2005-06? If no storm water samples were collected how can this analysis be presented? Please clarify with an introductory statement or amend.

*Weston: Analysis was performed based on the historical data record. Dry weather samples were collected during 2006.*

344. **City of Del Mar, ES 4.2.2, Page ES-6:** Clarify which year and whether or not IBI and O/E is bad or good for the general reader.

*Weston: This clarification was made globally.*

345. **City of Del Mar, ES 4.3, Page ES-7:** Recommend changing the word "Another" to "The remaining" where indicated

*Weston: The text was revised as requested.*

346. **City of Del Mar, ES 4.3.2, Page ES-8:** Please verify… Hyalella present and toxicity for it also found? If this is of interest we should say a little more here.

*Weston: Text was added to indicate that this finding may suggest that toxicity only occurs during storm events and that it may be a short term effect.*

347. **City of Del Mar, ES 4.5.1, Page ES-11:** The discussion of loads is repeated twice. Recommend deleting duplicative statements.

*Weston: The duplicative discussion was removed from the first paragraph.*

348. **City of Del Mar, ES 4.8, Page ES-15:** Recommended wording changes (to read… the Otay Reservoir and prevents flows downstream.

*Weston: The text was revised as requested.*

349. **City of Del Mar, ES 4.9.1, 1st paragraph:** Wastewater is generic and includes all types of water with waste. Recommended wording changes from "wastewater" to "sanitary sewage".

*Weston: Because we do not know that sanitary sewers exist in Mexico, we can only infer that the conditions of discharge suggest a generic "waste water" that may originate from multiple sources other than a sanitary sewer system. As such, the terminology was left unchanged.*

350. **City of Del Mar, ES 4.9.4, 2nd paragraph:** In the last sentence, the comment may be improved by clarifying that no bioassessment stations are located south of the US border and the reason that the conditions are not know. Appears speculative. Recommend removing..... didn't past TRV lagoon sediment data show different results than this? Benthic communities were relatively in fair condition during previous monitoring events in the estuary? This is my recollection, please verify.

*Weston: Using best professional judgment, we feel the IBI scores for this site are not representative and that severe benthic alteration has occurred. This is due to the very low diversity of taxa and the types present are direct indicators of organic pollution. The lagoon sediment/estuary are spatially removed from the bioassessment site so these data are not very comparable. A statement that no sites are monitored south of the border was added.*

351. **City of Del Mar, ES 5.1, 1st Bullet:** Recommend last sentence to read… "The highest concentrations were observed at the Tijuana River MLS, due to inadequate sewage treatment infrastructure."

*Weston: The text was revised as requested.*

352. **City of Del Mar, ES 5.1.1, 3rd Bullet:** Recommend 2nd to last sentence read… "High concentrations of TSS indicate potential land erosion issues. The intensity and duration of storm events can affect TSS concentrations."

*Weston: The text was revised as requested.*

353. **City of Del Mar, ES 5.1.1, 1st Paragraph:** Recommend first paragraph to read…in land disturbance activities and erosion…

*Weston: The text was revised as requested.*

354. **City of Del Mar, ES 5.1.1, 1st Bullet:** Recommend 2nd sentence read…All other significant trends are increasing including enterococci at Santa...

*Weston: The text was revised as requested.*

355. **City of Del Mar, ES 5.2.1, 3rd Paragraph:** Prefer #s read as 30 out of 30 as opposed to 30/30.

*Weston: The text was revised as requested.*

356. **City of Del Mar, ES 6, 1st, 2nd, 3rd Paragraphs:** Please clarify **"**the stage for answering these questions with gathering basic status and trend information." The questions have not yet been presented. re-write or re-organize these paragraphs for improved readability. May need to switch the order of the paragraphs. Third paragraph may be best placed first.

*Weston: Section was revised as recommended by this and other comments (See comment #195).*

357. **City of Del Mar, ES 7, 1st Paragraph:** Recommend revising 1st sentence to read as "The recommended actions resulting from the triad assessments for each WMA or MLS are summarized in Section 14.3."

*Weston: The text was revised as recommended.*

358. **City of Del Mar, ES7.0 (watershed ES), page ES7-4, Table ES7-2:** This table differs from the table in the Los Peñasquitos WMA Executive summary. Exceeds WQO or DW Trigger levels? I believe these are Action levels exceedances and should be labeled that. They are not WQO Exceedances as shown on the column header (second column).

*Weston: All WMA executive summaries were revised for consistency and described as Action Levels where appropriate.*

359. **City of Del Mar, ES7.0 (watershed ES), Recommendations in ES7.0, page ES7-6:** Why recommend different toxicity test organisms? Why deviate from the standard three that we have been using and have been part of the Monitoring Program to date? Unless there is a specific need or reason, that can be clearly stated or justified, then we should not leave this in here and open the door for additional test organisms.

*Weston: The text was changed; statement suggesting other test species be considered was deleted.*

360. **City of Del Mar, ES7.0 (watershed ES), Recommendations in ES7.0, page ES7-6, 2nd to last sentence:** Unclear what the ambient condition means. Delete or edit to clarify.

*Weston: The text was changed; "(ambient) was deleted."*

361. **City of Del Mar, Section 7.4.1, page 7-31:** In the discussion of the paragraph (Figure 7-11), Text is inconsistent with the Table. Example, Toxicity did not have the most detections in 2001-02 (4) instead it would appear to be 2006/07 (5). So, either the text is incorrect or the incorrect bar table was included in the document. Verify and correct as appropriate.

*Weston: The text was changed as recommended; 2006-2007 had most toxicity detections.*

362. **City of Del Mar, Section 7.4.3, page 7-33, 2nd to last paragraph:** This needs more specific info to be clear. If we mean to say that the B rating is due to the larger watershed being the over-riding factor… then please state which watershed (Santa Maria Valley?). As worded the reading is left to guess what this means.

*Weston: Additional test was added to clarify the priority ratings.*

363. **City of Del Mar, Section 7.5, page 7-35, last paragraph:** In the discussion of considering additional test organisms…Same comment was provided in the Executive summary for this watershed. Please make the corrections consistent with those comments and changes. Why should additional test organisms be considered if there are no constituents above the WQO, the existing requirements do not call for using other organisms? This recommendation could lead to increase monitoring requirements and costs. Recommend deleting.

*Weston: The text was changed; mention of testing additional test organisms was deleted.*

364. **City of Del Mar, Section 8.2.1, paragraphs describing 2nd and 3rd storm, page 8-7:** Seems confusing to say this for every storm – see below. May want to just mention which one was the largest overall (at the end of the season) and not "to date". Same comment for the 3rd storm discussion

*Weston: The text was changed as recommended.*

365. **City of Del Mar, Section 8.2.1, 2nd paragraph on page 8-10:** Correct dates to reflect 2007 for the February storm discussions.

*Weston: The text was changed as recommended.*

366. **City of Del Mar, Section 8.5.3, page 8-32:** Where it discusses …It should be noted…Please expand language. I believe you mean to say that the A rating would be changed to something other than an A, but the way it is worded is not clear, nor does the notation on the table give the reader a clear indication as to whether is has already been changed. I had to go back to compare with last year's table to verify. The reader should not be left with that question.

*Weston: Sentence added to explain "A" priority rating.*

367. **City of Del Mar, Section 8.6, last paragraph, page 8-34:** Revise last paragraph to read as follows… **"**These new stations will provide additional data to evaluate the spatial distribution of constituents within the watershed during dry (ambient) conditions. These data will allow for the estimation of annual loading within the watershed. Data will also be gathered to comply with the lagoon Investigative Order No. R9-2006-076 during the 2007-2008 monitoring period that will provide valuable information related to sediment speciation and levels at various stations within Los Peñasquitos Lagoon."

*Weston: The text was changed as recommended with one exception: replaced "levels" with "siltation".*

368. **City of Del Mar, Section 14.1.4.4, page 14-14, 2nd paragraph:** See Del Mar comments for Section ES 4.9.2 for a more "user-friendly" version of the description of the findings. We recommend that all bioassessment descriptions include a 'layman's" version of what the rations and scores mean.

*Weston: We changed the wording to be more intuitive for the reader.*

369. **City of Del Mar, Section 14.1.4.5, page 14-15, 2nd to last paragraph:** See previous comment.

*Weston: See comment 368.*

370. **City of Del Mar, Section 14.1.4.5, page 14-16, 3rd paragraph:** See recommended changes listed in Section 8. Reprinted here - The new permit monitoring order (R9-2007-0001) calls for two temporary watershed assessment stations (TWAS) for this watershed. One is located in the Carroll Creek drainage area and one is located upstream of the historical MLS. These new stations will provide additional data to evaluate the spatial distribution of constituents within the watershed during dry (ambient) conditions. These data will allow for the estimation of annual loading within the watershed. Data will also be gathered to comply with the lagoon Investigative Order No. R9-2006-076 during the 2007-2008 monitoring period that will provide valuable information related to sediment speciation and levels at various stations within Los Peñasquitos Lagoon.

*Weston: The text was changed as recommended with one exception: replaced "levels" with "siltation".*

371. **City of Del Mar, Section 14.2, paragraph after Q5 discussion, page 14-26:** Title for this section? Maybe "Program Overview Discussion"

*Weston: See comment #356. Because the section was revised, this heading was not added.*

372. **City of Del Mar, Section 14.2, last paragraph on page 14-26:** Delete the words "many new" in the first sentence. Revise second to last sentence to read as follows: "The new permit also requires the Copermittees to assess emerging pollutants and pollutants that have not been recently addressed (e.g. synthetic pyrethroids and trash)."

*Weston: Sentence was revised as recommended.*

373. **City of Del Mar, Section 14.2, top of page 14-27:** Delete the word programs from sentence. Revise second paragraph by deleting "developing programs" and changing to "implementing them"

*Weston: Sentence was revised as recommended.*

374. **San Luis Rey River Watershed Group (Meleah Ashford), Section 5.4.3:** BLTEA ratings – the 2006 303(d) rating has TDS for 19 miles, which takes into 903.2.

*Weston: LTEA update results are based on the 2002 section 303(d) listing.*

375. **SanLuis Rey River Watershed Group (Meleah Ashford), Section 5.4.3:** The BLTEA rating for 903.3 should be a "C". There is no data therefore is one lower than the WMA, which is a "B".

*Weston: Assuming the comment is related to comment 374, dissolved metals are listed as a "C" for 903.3.*

376. **SanLuis Rey River Watershed Group (Meleah Ashford), Section 5.1.4, Page 7:** It appears that the portion of the WMA that drains to the MLS is closer to 95% rather than 60%.

*Weston: The area above Lake Henshaw was not considered in the analysis because there is not a direct hydrologic connection.*

377. **SanLuis Rey River Watershed Group (Meleah Ashford), Section 5.1.4, Page 7:** Related to this, the percentages of land uses for the WMA draining to the MLS don't seem right. Most of the watershed drains to the MLS and the breakdown of land uses in the watershed are shown in your figure 5-2. Maybe your assessment cuts off at the "urbanized" boundary? Maybe its because some of the watershed is in Riverside. At any rate, I think this should be checked.

*Weston: The area above Lake Henshaw was not considered in the analysis because there is not a direct hydrologic connection. A more detailed and comprehensive land use analysis will be done in future reports based on direction from the Copermittee Monitoring Workgroup.*

378. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), Figure ES10-1:** Clarify: not all the dry weather sites are shown in the figure as implied by the text

*Weston: Text changed to clarify dry weather stations were not included in Figure ES 10-1.*

379. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), Figures ES10-2 and 10-3 Captions:** Check for orphans

*Weston: Orphans will be checked for the final print version. There may be formatting differences between different printers used when downloading via the ftp site.*

380. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), paragraph below figure ES10-4:** Recommend revising paragraph to read as follows "Table ES10-1 summarizes constituents with concentrations detected at levels above the Copermittee water quality benchmarks with exceedances of benchmarks shown in bold. Pesticides, hardness, and dissolved metals were not detected at levels above benchmarks.

*Weston: The text was changed as recommended.*

381. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), Table ES10-1:** Change WQO to benchmarks

*Weston: Reference to benchmarks was revised as recommended throughout the document.*

382. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), paragraph describing Figure ES10-5, page ES 10-2:** Revise sentence to read as "The ratio of selected constituent concentrations to the benchmarks were plotted for each of the three storm events in the current monitoring year along with the ratio of historical mean concentrations to the benchmarks for the Copermittee monitored storm events…"

*Weston: The text was changed as recommended.*

383. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), paragraph after Figure ES10-5, page ES 10-3:** May want to eliminate scatter plots in order to avoid having to explain them. If keep, provide better explanation so non-technical planners can understand basic elements of the scatter plot. For the discussion of TSS… Yes, but still not even half of the benchmark; much different than turbidity. Should be additional clarification.

*Weston: Scatter plots were removed based on this and other comments received. TSS and turbidity relevance was clarified.*

384. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), 2nd paragraph after Figure ES10-5, page ES 10-3, Constituent Loads:** Provide context (e.g. NQSD).

*Weston:* Additional text describing how expected loads were estimated has been added to the report.

385. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), Dry Weather Discussion:** Revise 2nd sentence to read as follows: **"**The purpose of this program is to identify and stop illicit discharges into the MS4, and for a variety of reasons is not necessarily representative of Copermittee discharges from the MS4."

*Weston: The text was changed as recommended.*

386. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), Dry Weather Discussion:** Correct font size "Consituents found…" check in other areas of ES10 also.

*Weston: Font size changed from 12 to 11 as recommended.*

387. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), Table ES10-2:** May want to add a column showing % exceedances and then list analytes based on percentages.

*Weston: This will be addressed in future reports.*

388. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), Bioassessment Discussion:** Add "twice during the 2006-2007 monitoring year after …was conducted… in the first sentence. Delete the word "affected" after urban

*Weston: Section was revised as recommended.*

389. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), Table ES10-3:** Define O/E in table footnote.

*Weston: O/E was defined as recommended.*

390. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), WMA Assessment Discussion:** where turbidity is in parentheses**,** add fecal coliform? Either add here or complete section is wrong or I am not understanding the purpose of this parentheses correctly.

*Weston: The word "triad" was inserted in the sentence above the bullets for clarification in all WMA executive summaries, as these are the triad assessment results. Fecal coliform and TDS are still identified as COCs in the table below the section.*

391. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), WMA Assessment Discussion:** in bullets, add whether trends are above or below and relevance to benchmarks.

*Weston: The section was revised based on other comments received. The relevance to benchmark WQO was added.*

392. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), WMA Assessment Discussion, after bulleted trend section:** For future years, not this report, will need to address 1) benchmarks used (example being total phosphorus – problem using Basin Plan WQO, but not with benchmark) and 2) third party data (low DO a problem based on Padre Dam data). Root cause appears to be

inadequate of distinction/explication of difference between receiving water data/assessment vs. MS4 data/assessment in reports.

*Weston: These are good points and will need to be addressed with the Copermittee Monitoring Workgroup.*

393. **City of El Cajon/TRC Environmental (Jerome Jaminet), Section ES10.0 (watershed ES section), Recommendations Discussion, third to last sentence:** For chloride, TDS, sulfate, manganese, nutrients and bacteria…Only two of these constituents are justified in the previous text. Need better explanation of why these are mentioned or simply replace with "constituents of concern" or similar language.

*Weston: Text changed; list replaced with "constituents of concern."*

394. **City of Chula Vista:** Volume II, Appendix A, Pages 1-20 of 20 - It appears from some of the graphs that samples have been taken before the storm event and during the first flush. Can the results from this sampling be considered representative of the whole storm event?

*Weston: See response to Comment 289.*

395. **City of Chula Vista:** Volume II, Appendix B.7-2, Page 1 of 1 - Sites REF-DC and REF-BCR are at elevations 4950 feet and 2655 feet respectively. Can bioassessment at these higher elevations be representative of receiving waters within coastal zones? It seems that more rainfall and other climatic differences would make it unlikely to expect the same bioassessment results for coastal areas as higher mountainous elevations.

*Weston: Since the IBI is based on the full range of historical data from reference sites in Southern California, not just the ones we sampled, the IBI scores will be calculated in the same way. Also note that the O/E does account for rainfall, longitude, and geomorphology, so that index may be more accurate at determining impairment in coastal sites (that's an ongoing argument!). When Ode et al developed the IBI, climate and ecoregions were considered. Two different ecoregions were identified in Southern California, and all of the sites in the San Diego County program are in the lower elevation/warmer ecoregion (Omernik region 6). Our experience makes us believe that elevation comes into play at about 3,000-3,500 ft, and that water temperature is likely a key factor. We believe that the climate at REF-DC is not representative of the lower elevation sites (many "cold water" taxa are collected here), and state this in section 5. The site provides good information on the diversity of SoCal macroinvertebrate populations. The BMIs at REF-BCR is similar to sites on Camp Pendleton at elevations below 1,000 ft.*

396. **City of Chula Vista:** Volume II, Appendix H.7.2, Pages 1-9 of 9, 1-8 of 8, 1-10 of 10, and 1-8 of 8 - Where are the sampling locations at the Sweetwater Authority Desalination Plant? It is not clear if the samples were taken from the Sweetwater River. Due to the elevated TDS levels, it appears that the samples were taken from the desalination plant effluent water.

*Weston: The lat/longs in the data table provided by the Port of San Diego do not appear to be correct for some of the sites. The only sites with relevant locations were located in the Sweetwater River channel in the tidally influenced area. This may explain some of the high TDS results.*

397. **City of Chula Vista:** Volume I, Page ES22 - EMCs should be used only from regions that have similar hydrological and land use characteristics as San Diego County. It seems that population density, industries, etc. can affect EMCs.

*Weston: We agree that EMCs from the same region may improve the accuracy of the loading analysis. However, adequate land use specific EMC data are not available for the San Diego Region. As such, the interquartile ranges of EMC values from the National Stormwater Quality Database (Pitt et al., 2004) were used for this assessment. In Section 3, a comparison of the national median EMCs against the median concentrations found in the limited data set containing EMCs from the southwest (EPA Rain Region VI). The interquartile range bars shown in Figure 3-5 show that these median values fall within the same range. The load assessment compared measured loads to the interquartile range of loads derived from the EMCs in the national database.*

398. **County of San Diego (TC):** Section ES.4.8, Page ES-15, 1st paragraph: It was my understanding that the Otay MLS was removed from this watershed due to lack of flow in 2001– 2002 monitoring season and not replaced. It is not clear from later monitoring periods if there was indeed flow and that monitoring did not occur because MLS was no longer there?

*Weston: The text was revised to clarify the Otay MLS was not replaced after the 2001-2002 season.*

399. **County of San Diego (TC):** Section ES.4.8.4, Page ES-17, WMA Assessment: Why isn't Dry Weather Monitoring Data included in this assessment? Seems it is pertinent to the overall WMA assessment and is discussed in later sections.

*Weston: Dry weather data were used in the assessment to determine high, medium, or low frequency of occurrence COCs. However, it is not specifically called out in this executive summary section. It is described in the WMA section and in the methods Section 3.*

400. **County of San Diego (TC):** Section ES.5.1, second bullet, page ES-19: Where it states Sweetwater WMA: Should this be SD Bay? Or should you note that this is for Sweetwater River versus the entire WMA?

*Weston: The text was revised for consistency as recommended.*

401. **County of San Diego (TC):** Section ES.5.6, Coastal Outfall Data: Would this data provide additional information that is pertinent to this analysis. For example would it result in any significant changes in the overall assessment of the WMA's?

*Weston: The Coastal Outfall data does not typically impact the WMA assessments. If data suggests impaired conditions, some revisions could be needed, but are not expected.*

402. **County of San Diego (TC):** Section 1.1, page 1-1, Reference to Unincorporated areas of…, Review of the 2001 NPDES permit does not support this comment. Please delete the statement…"within the Urban Limit Line"

*Weston: The text "within the Urban Limit Line" was deleted as recommended.*

403. **County of San Diego (TC):** Section 1.1, page 1-2, Reference to…the three elements… There are five questions presented in Section 14 that monitoring programs are being used to address. It might be helpful to identify which of the 5 questions these programs can be used to address. Might be also be helpful to include a brief discussion on what monitoring programs need to be considered if these do not address all of the questions.

*Weston: Additional text was added to present the five SMC management questions and how each element of the monitoring programs are used to answer specific questions.*

404. **County of San Diego (TC):** Section 1.2, page 1-3: It may be beneficial to restructure this section to list the different monitoring programs and explain key elements and objectives of each program then discuss differences by year under each. This would be particularly helpful after the 2001-01 Permit.

*Weston: This section is primarily used to present a brief summary of the previous monitoring programs objectives and elements. Each year's changes are noted throughout the section. Restructuring this section will be considered in future reports through collaboration with the Monitoring Workgroup.*

405. **County of San Diego (TC):** Section 1.2.8.3, page 1-13, 1st sentence in paragraph: Should this be 2003 – 2004? Has section been modified to reflect only changes in 2003 – 2004 or was it exactly the same as 2002 – 2003?

*Weston: This section was corrected*

406. **County of San Diego (TC):** Section 1.3.1, Reference to Camp Pendleton in 3rd sentence of 1st paragraph: Recommend deleting "Camp Pendleton voluntarily provides data to the Copermittees for the Santa Margarita River". Should this be deleted if there were no sampling as indicated in table below?

*Weston: This statement was previously added to clarify why samples may not be collected at the Santa Margarita MLS and was left unchanged.*

407. **County of San Diego (TC):** Section 2.1.5, Land Areas: Seems that there is a mix of data used in this section and in sections specifically to Santa Margarita and Tijuana WMA that mixes data within the County with that from outside the County (i.e. Riverside and Mexico). However it is not always clear when you are referring only to data that includes only areas within the County from areas outside the County. I will try and point to some specific areas in the appropriate sections, specifically for the Tijuana WMA.

*Weston: Clarification was added in the text. A more detailed and comprehensive land use analysis will be done next year.*

408. **County of San Diego (TC):** Section 2.1.5, Table 2-4, page 2-14: It should be noted that Unincorporated areas include area that is not within the County jurisdiction (ie Fed/State/ and Indian Lands)

*Weston: Added clarification in the text.*

409. **County of San Diego (TC):** Section 2.1.5, Figure 2-9 caption, page 2-15: Does not include lands outside of County but part of the WMA for Santa Margarita and TJ.

*Weston: Added clarification in the text.*

410. **County of San Diego (TC):** Section 2.1.6, Table 2-5, Parks and Under Construction Land Uses: For Parks: Parks not really an accurate land use as this includes ball fields and other active parks as well as Open Space Preserve and other Passive use areas. For Under Construction: This is another case where these land uses should be included under the LU that they are being developed. For example Residential Construction should be included in the residential category etc.

*Weston: A more detailed and comprehensive land use analysis will be done next year.*

411. **County of San Diego (TC):** Section 2.1.6, Table 2-6: Do these include an estimation of Impervious Cover in areas outside County?

*Weston: Yes, Clarification was added.*

412. **County of San Diego (TC):** Section 2.1.7, 2nd paragraph, page 2-17: Discussion of population density… Again the reference to Figure 2-10 does not include information outside of County which does have a significant impact on the SMARG and TJ WMA calculations.

*Weston: Only the US population data was used. Clarification was added.*

413. **County of San Diego (TC):** Section 2.1.7, 1st paragraph, 2nd to last sentence, page 2-19: …are projected to grow… Do these projections include growth outside of County? Percentages could change significantly if population increases for Riverside and Mexico are included.

*Weston: Only US population data was used. Clarification was added.*

414. **County of San Diego (TC):** Section 2.2, 1st paragraph, 3rd sentence, page 2-20: Revise sentene to read as "While most of the MSL sites are located with the more urbanized areas of the WMA most of the open land identified in the runoff area is typically covered by chaparral."

*Weston: Text was added.*

415. **County of San Diego (TC):** Section 2.2, Figure 2-13: This figure uses open space versus parks that was used in Table 2-5. Should use similar LU categories for each figure. Also would seem to lump undeveloped/vacant land into open space.

*Weston: A more detailed and comprehensive land use analysis will be done next year.*

416. **County of San Diego (TC):** Section 2.2, Table 2-9: Does this include estimates outside County (ie Riverside and Mexico)?

*Weston: Yes, Clarification was added.*

417. **County of San Diego (TC):** Section 3.3.2, first paragraph, page 3-13, discussion of reference sites: There should be additional discussion of what these are and how they are used when comparing the other Bioassement Sites. For instance how were the Reference Sites used in the evaluation of specific Bioassessment Sites. For example was the Wilson Creek Reference Site used to compare against the Tijuana Monitoring sites or was the a cumulative score developed from all the Reference Sites that was then used to compare against each of the monitoring sites?

*Weston: A discussion of the role of reference sites was added. There is no real ecological difference between the northern and southern ends of San Diego County so all three reference sites may be considered for comparison to all county sites.*

418. **County of San Diego (TC):** Section ES12.0, Introduction: Seems that most of this information is repeated in Section 12. Should not simply cut and past from there to here this should only represent a summary and include what is necessary to include in the WURMPS.

*Weston: The executive summary format was developed from recommendations from the WURMP leads workgroup and a final format has been determined.*

419. **County of San Diego (TC):** Section ES12.0, Figure ES12-1: Figure does not include Dry Weather Monitoring Locations.

*Weston: Text revised*

420. **County of San Diego (TC):** Section ES12.0, Storm Water Runoff Section: The major land uses…: Does this include the WMA within Mexico? Since there is no definition of what this LU includes not sure that it is indicative of the areas within this WMA. Does this include active parks such as sport fields/complexes and playgrounds? Or is this more or less preserved areas such as State/Federal Parks and Natural Preserve areas?

*Weston: Yes, Clarification was added. A more detailed and comprehensive land use analysis will be done considered based on the Monitoring Workgroups recommendations.*

421. **County of San Diego (TC):** Section ES12.0, Figure ES12-4 Caption: The caption needs to be revised from "San Luis Rey" to "Tijuana"

*Weston: Text was revised.*

422. **County of San Diego (TC):** Section ES12.0, Figure ES12-6: Is it necessary to include all of these plots.

*Weston: Scatter plots were removed from each WMA executive summary based on this and other comments.*

423. **County of San Diego (TC):** Section ES12.0, Stream Bioassessment section, page ES5-5: The discussion of dry conditions and moving upstream… Was this at the MLS location?

*Weston: The bioassessment site is about 2.5 miles upstream of the MLS*

424. **County of San Diego (TC):** Section ES12.0, Stream Bioassessment section, page ES5-5, beginning of last paragraph: The Campo Creek site… Did the change in location have any affect on these two results?

*Weston: Since we have not done a direct comparison (sampled each location in the same season) we cannot answer this question with scientific certainty. But it makes sense that the higher quality habitat supported a higher quality biotic community. Speculation on this was added to the text.*

425. **County of San Diego (TC):** Section ES12.0, Recommendations: In the lead in to this section…Several considerations… OK what are they? And is this the reason that the recommendations are to continue monitoring?

*Weston: The sentence "Several considerations…" was removed from all WMA sections based on this and other comments.*

426. **County of San Diego (TC):** Section ES12.0, Recommendations: In the discussion of long-term trends… What is needed for long term analysis? Seems we have been monitoring for at least 7yrs and that there has been some trend analysis completed. Should include some recommendation on those current trends.

*Weston: Trend analysis is one portion of the analysis in the watershed assessment process. However the triad assessment takes into account wet weather, dry weather, toxicology and bioassessment data to determine overall watershed assessment recommendations. Trend analyses are used to evaluate patterns of use over time.*

427. **County of San Diego (TC):** Section ES12.0, Recommendations: In the discussion of the CBI Grant… Is this a recommendation for the U.S. portion of the WMA or Mexican or Both. Seems that at least there should be a recommendation to work with Baja Stakeholders on this effort. Will this study provide information regarding Baja? And provide remediation actions for Baja?

*Weston: Text revised. Clean Beaches funding can only be used within the US and therefore no monies are allocated to investigate or remediate on the Mexican side of the border. Liaison with Cross border agencies will likely occur during stakeholder meetings.*

428. **County of San Diego (TC):** Section 12.1, page 12-1: This section switches indiscriminately between watershed wide statistics and those that are unique to one side of the border or the other. It should be clearly noted when data reflects U.S. data and when it includes Baja Data/information. Furthermore there needs to be a discussion regarding the ability to abate or identify sources outside the U.S. jurisdiction.

*Weston: Section 12.1 was revised for clarity as recommended.*

429. **County of San Diego (TC):** Section 12.1, 2nd paragraph, last sentence, page 12-1: Population for U.S. Area was approximately 75,000 based on the 2000 census data.

*Weston: Text was revised.*

430. **County of San Diego (TC):** Section 12.1, Figure 12-1: These graphics include areas within Mexico as being within the WMA when in essence the WMA is limited to the US side of the Border.

*Weston: Clarification added.*

431. **County of San Diego (TC):** Section 12.1.3, Table 12-2: Should this also include 911.12?

*Weston: There are no segments listed in HSA # 911.12 on the 2006 CWA Section 303(d) List.*

432. **County of San Diego (TC):** Section 12.1.4, 1st paragraph, last sentence: This is the only real discussion that there is runoff contributed by Mexico. However, the analysis in the later sections does not provide any details regarding the contribution of this source or the ability of the Copermittees or the RWQCB to abate or id the potential pollutants. Nor is there any discussion regarding any existing or potential coordination that could or should occur between the Copermittees and Mexico.

*Weston: Discussion of this nature is beyond the scope of this report. It is recommended to address these issues with the WURMP Leads and Monitoring Workgroups in future meetings.*

433. **County of San Diego (TC):** Section 12.1.5, 1st paragraph: In the discussion of …Future surveys…: Seems that there should be a little more information provided here regarding each of the sites including stream condition and habitat structure and quality. Also if the Wilson Creek Reference Site is used in developing the IBI or O/E for these monitoring locations there should be some discussion of it as well. If a composite reference condition was developed then there should be discussion that includes what is the San Diego Reference Condition.

*Weston: Habitat quality of the sites is discussed in more detail in section 12.3. The reference sites in the County program are not used to "develop" the IBI or O/E, the calculation of these indices is fixed.*

434. **County of San Diego (TC):** Section 12.1.5, 1st paragraph: In the discussion of … with better habitat)…: There should be some additional discussion as to why this occurred and there should be some discussion in the results on any affect that this may have had on the outcomes of the IBI and the O/E for Campo Creek.

*Weston: Text was added describing why the site was sampled downstream. In dry years, the only reach of the stream that flows is at the road crossing, which has poorer habitat. As stated above, we can't be certain the exact effects the different locations have on results, because we did not sample both sites in the same season.*

435. **County of San Diego (TC):** Section 12.2, 1st paragraph, last sentence: Discussion of TIEs: Was this from previous or 2006?

*Weston: Text was revised.*

436. **County of San Diego (TC):** Section 12.2.1, 1st paragraph, discussion of storms monitored: The hydrograph includes a storm event occurring before 2/28/07. There should be a brief discussion of why this storm event (largest/strongest) was not sampled.

*Weston: Additional text was added to describe why this storm event was not sampled.*

437. **County of San Diego (TC):** Section 12.2.1.1, Table 12-4: Should the second storm be 1/30/07?

*Weston: Table was revised to reflect 1/30/07.*

438. **County of San Diego (TC):** Section 12.2.1.2, 1st paragraph on page 12-10 through paragraph 4: Not necessary to repeat exactly what the table shows. Several revisions are recommended as provided. In the reference to the WQOs, these should be stated similar to the others what is the WQO for each of these WQO (metals)?

*Weston: A new appendix was created (Appendix K) to show the WQO for metal concentrations based on hardness for reference to the reader.*

439. **County of San Diego (TC):** Section 12.2.1.2, Toxicity paragraph: Recommend deleting "The NOEC for the 96-hour survival for *H. azteca* was 25%, during the October 14, 2006 event, 12.5% during the January 30, 2007 event, and 50% during the April 20, 2007 monitoring event." Is this good, bad? Not sure what this means in this context. Both these sentences can be deleted unless they are the WQO. The information can be found in the table.

*Weston: Text was added to provide clarification of NOEC values.*

440. **County of San Diego (TC):** Section 12.2.2.1, Relationships: Not sure what relationships you are trying to communicate or identify here.

*Weston: Heading was revised to provide clarification.*

441. **County of San Diego (TC):** Section 12.2.2.1, Bulleted items: Again not necessary to show everything that is found in Table 12-3. Not sure why you changed to bullet format for these next two sections while all other information previously and after this is in paragraph form. Also not clear as to what this relationship indicates. Also, recommend deleting the items marked e.g. n=13/15.

*Weston: Text was revised*

442. **County of San Diego (TC):** Section 12.2.2.1, Page 12-11, Paragraphs 2-5: Recommended revisions in text where indicated for better readability.

*Weston: Text was revised as requested.*

443. **County of San Diego (TC):** Section 12.2.2.1, Page 12-11, last paragraph in this section on page 12-5: These statements seem to state the same information as the paragraphs above in the results section and does not provide any relationship discussion.

*Weston: Text refers to relationship between the historical monitoring results in comparison to the benchmark WQOs. The results section only compares the current year's data.*

444. **County of San Diego (TC):** Section 12.2.2.2, Page 12-11, discussion of the S statistic: Seems that this should be highlighted or otherwise set off. What is this Statistic and what is it used for.

*Weston: The "S" Statistic is used to compare to the critical S statistic to determine significance which is provided in Appendix C. A reference to this table was provided in the section. (Also see comment #447).*

445. **County of San Diego (TC):** Section 12.2.2.2, Page 12-11 and 12-12, discussion of the Sen's Slope: What is this? If there is more information regarding these trend tests in Section 3 then you should refer the reader back to that section or provide a better discussion of what the purpose of the Mann-Kendall test is used for and why it is used for a particular constituent. What is the value of using the median trend? What is value of true slope versus a predictive slope?

*Weston: The reader is pointed to the methods section in paragraph 3 of the section. The median slope is plotted on the graphs, the trend is tested using the Mann-Kendall test. The emphasis on predictive is meant to point out that the observed trend results are only applicable for observed data, and should not be extrapolated into the future.*

446. **County of San Diego (TC):** Section 12.2.2.2, Page 12-12, discussion of the …significant trends are shown in this section…: Should be some discussion regarding the

relative importance of these trends whether increasing or decreasing and how they relate to WQO for the watershed.

*Weston: Text was revised to include trend relation to benchmark WQOs.*

447. **County of San Diego (TC):** Section 12.2.2.2, Page 12-12, Last paragraph, (S=47) statistic: So this is the "S" statistic mentioned above but not clear from this discussion on how this was derived or the relative importance of it. How doe the magnitude relate to this S is magnitude the table value?

*Weston: The calculated S statistic is used for comparison with the critical S values in a table. The critical value is determined by sample size and required significance (in this case, $p<0.05$). The magnitude of the S statistic is not important. Rather, whether or not the S statistic is above or below the critical value for that sample size.*

448. **County of San Diego (TC):** Section 12.2.2.2, Page 12-12, Last paragraph: The conductivity graph is not in Figure 12-4?

*Weston: Table added to Section 12.2.2.2*

449. **County of San Diego (TC):** Section 12.2.2.2, Page 12-14, Paragraph above Figure 12-5 graphs: For the description of "relatively flat" How is this different from other slopes? Is steepness of slope related to level of significance?

*Weston: Text was revised.*

450. **County of San Diego (TC):** Section 12.2.4, Page 12-22, Last paragraph in section: How many dry weather sites are there in the description of the dry weather figure?

*Weston: Text was revised.*

451. **County of San Diego (TC):** Section 12.2.5, Page 12-22, 1st paragraph in section: What is log Kow?

*Weston: Text was removed from report. The $K_{ow}$ is the: Octanol – Water Partition Coefficient. The Octanol – Water Partition Coefficient is a measure of the physiochemical properties of a substance in relation to solubility in water and solvents.*

452. **County of San Diego (TC):** Section 12.2.5, Page 12-22, 3rd paragraph in section: This statement seems to be in conflict with Table 12-11. Explain.

*Weston: Text was added to Section 12.2.5 to address comment.*

453. **County of San Diego (TC):** Section 12.3.1, Page 12-24, 1st paragraph in section: The Table 12-10 identifies the IBI as poor. It is stated earlier that the location of the May survey was moved downstream of the previous survey. There should be a discussion of the reasons for this occurring and how it might have affected both the IBI & O/E ratio. In table

12-8, How does this relate to the overall Bioassessment Score of poor presented in Table 12-10?

*Weston: Additional discussion was added, see responses 424, 434. The overall IBI rating of Poor was determined by the site mean for all years of sampling (Figure 12-11).*

454. **County of San Diego (TC):** Section 12.3.1, Page 12-24, 1st paragraph in section, last sentence: This is a little confusing, seems that below a limit is bad and above is good.

*Weston: This comment came from others: IBI and O/E are the only water quality "numbers" where a high value is good. Text was re-worded globally to make this more intuitive.*

455. **County of San Diego (TC):** Section 12.3.1, TJ-BF, Page 12-28, 1st paragraph on page: This location was also moved due to dry conditions during the previous October sampling. Could the change in locations have an affect on the IBI and O/E? Explain.

*Weston: It is not expected that the location change would have an affect in this case. The distance was not great and the stream habitat was very similar at both sites.*

456. **County of San Diego (TC):** Section 12.4.1, Table 12-10: This years table only includes ammonia while previous year monitoring reports also included un-ionized ammonia. This years reports includes previous data for un-ionized ammonia in the ammonia category. Should this category be renamed un-ionized ammonia? Is this an issue?

*Weston: A slight revision to previous versions of the Constituent Exceedance Table (Table 12-10) was made for the 2006-2007 report. During wet weather, ammonia is measured and then un-ionized ammonia is calculated from the ammonia measurement for comparison to Basin Plan benchmark WQO. During dry weather, ammonia (NH3-N) is measured and compared to dry weather action levels. The 2006-2007 report combined these two disparate measures of ammonia and grouped them under the conventional constituent category in Table 12-10 per methods defined under the* Baseline Long-Term Effectiveness Assessment (BLTEA) process (Section 12.4.3).

457. **County of San Diego (TC):** Section 12.4.2, Table 12-11: The statement of …If recheck indicates benthic…in the first bullet in the column on the right: This is in conflict with recommendations under the TIE discussion earlier.

*Weston: Text was added to Section 12.2.5 to address comment.*

458. **County of San Diego (TC):** Section 12.4.3, Table 12-12: None of the BLTEA ratings have changed from the previous years so why has ammonia gone to a 3 diamond rating?

*Weston: As described in Section 12.4.3 the BLTEA priority ratings were based on the data record from 2001-2006 from the following programs and will be updated on a 5-year cycle. As such, no changes were made to the BLTEA ratings for the 2006-2007 report. However, revision was made to the Constituent Exceedance Table (Table 12-10) methodology for this years report (See response to comment # 457).*

459. **County of San Diego (TC):** Section 12.5, 1st paragraph, 3rd sentence. Discussion of 58% of U.S. Lands: Based on figure 12-2 this should be 60%.

*Weston: Text was revised.*

460. **County of San Diego (TC):** Section 12.5, last paragraph, discussion of several considerations…: What are these considerations? And why should they be made? Seems that we already have some significant data to show that there is a problem in the lower reaches of this WMA and that the trends are already significantly increasing for several COC. Seems there should be some additional recommendations on actions that could be taken to abate some of these problems. Not sure how to deal with the TIE issue where one table indicates that additional monitoring and TIEs should be a consideration in this WMA but then the recommendation not to complete them until a later time.

*Weston: Text was revised.*