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January 8, 2009

To: Municipal Storm Water Copermittees  
From: David Renfrew, Project Manager  
Subject: Comments received for the Draft 2007-2008 Urban Runoff Monitoring Report

Thank you for your constructive and well thought comments to the “San Diego County Municipal Copermittees 2007-2008 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.

Comment #	Date Received	Copermittee
1-10	12/17/2008	City of San Diego
11-17	12/17/2008	County of San Diego
18-19	12/22/2008	City of Santee
20-31	12/22/2008	Port of San Diego
32-46	12/22/2008	County of San Diego
47-52	12/22/2008	County of San Diego
53-54	12/22/2008	Port of San Diego
55-93	12/22/2008	City of Vista
94-121	12/22/2008	City of Del Mar
122-127	12/22/2008	County of San Diego
127-156	12/22/2008	County of San Diego
157-181	12/23/2008	City of Oceanside
182	12/23/2008	City of Del Mar
183-186	12/23/2008	County of San Diego
187-190	12/23/2008	National City
191	12/23/2008	City of Oceanside
192-196	12/22/2008	County of San Diego
197-216	12/31/2008	City of Carlsbad
217	1/2/2009	County of San Diego
218-228	1/5/2009	County of San Diego
229	1/7/2009	San Diego County Regional Airport Authority

## Appendix P-Response to Copermittees' Comments on the Draft San Diego County Municipal Copermittees 2007-2008 Urban Runoff Monitoring Report

#	Section-Page #	Copermittee	Comment	Response to Comment
1	12-17	City of San Diego	We recommend that the Table 12-5 state "Refer to San Diego Bay Watershed Management Workgroup for further management actions to be taken." This will provide a mechanism for actions to continue, while staying within the framework of the Regional Monitoring Program.	Table was updated based on recommendations listed in permit and by other Copermittees' comments.
2	7-23	City of San Diego	Figure 7-23 correct spelling should be Coronado Hills.	Figure was corrected.
3	ES7-5	City of San Diego	Revise recommendation on TWAS.	Recommendation revised as requested.
4	9-6, 9-9, 9-11	City of San Diego	Figures 9-1, 9-4, and 9-5 should read Grossmont Reservoir.	Figure was corrected.
5	9-10	City of San Diego	Comment on Bacti 1 TMDL.	Comment addressed as recommended.
6	9-24	City of San Diego	9.5.2, 2 <sup>nd</sup> paragraph, 1 <sup>st</sup> sentence, add space after ...WQO in 11...	Edit corrected.
7	9-25	City of San Diego	Comment on Ambient COCs	Comment addressed as recommended.
8	10-8	City of San Diego	Add Switzer Creek where noted in Section 10.3	Addition was accepted.
9	10-86	City of San Diego	2 <sup>nd</sup> paragraph states DWM, should be CSDM	Revised as requested.
10	12-8, 12-14	City of San Diego	Add Urban where noted (related to CASQA Pesticide Subcommittee)	Not added. The correct title is CASQA Pesticide Subcommittee.
11	12-1	County of San Diego	Second to last sentence, delete ... "throughout San Diego County" where indicated.	Edits accepted as recommended.
12	12-3	County of San Diego	Last sentence under Nutrients section, delete ... "and may require further investigation" where indicated.	Edits accepted as recommended.
13	12-7	County of San Diego	Figure 12-1 can't read x-axis label	Figure was corrected.
14	12-11	County of San Diego	12.2.6, 1 <sup>st</sup> paragraph, delete last sentence and related numbers (editorial mistake). Delete last sentence from 3 <sup>rd</sup> paragraph and add "during permit re-issuance" where indicated.	Edits accepted as recommended.
15	12-13	County of San Diego	Add "during non-storm events" to 3 <sup>rd</sup> paragraph where indicated. Revise the last sentence, last paragraph to "The data will be not be assessed until the program is fully implemented in the 2008-2009 monitoring year."	Edits accepted as recommended.
16	12-15	County of San Diego	Delete first full paragraph on NNE Tool	Edits accepted as recommended.
17	12-15	County of San Diego	Revise Table 12-5 to be consistent with Permit Table 3 and as needed to clarify findings.	Table was updated with recommendations from Permit Table 3.
18	ES9-2	City of Santee	I note that in Table ES9-3 there is reference to City of Santee Wet Weather data. We did not provide any. I believe that you are referencing City of La Mesa data.	The data was the ambient data collected during the wet season. It was not wet weather monitoring data. This was clarified in the Final Report.

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19	ES9-4	City of Santee	Can you verify that the reference to increasing turbidity trends is correct? A brief overview of our ambient data does not indicate this, and increasing turbidity has not been noted in our dry weather program either.	The trends are based on long-term receiving water storm water monitoring data at the San Diego River MLS. Dry weather program data assesses the MS4 system and not the receiving waters as indicated in the permit core management question #5.
20	ES10-1	Port of San Diego	Table ES-10. Since RHMP data was reviewed for the receiving water assessments, shouldn't we list it here with a footnote stating that RHMP was not a regional activity but is useful to improve evaluation of receiving water conditions?	RHMP data summary was included as a reference but was not fully assessed in relation to a specific watershed in San Diego Bay.
21	ES10-1	Port of San Diego	Editorial comments.	Editorial comments accepted where appropriate.
22	ES10-3	Port of San Diego	While receiving water monitoring did not occur, there was some urban runoff monitoring that occurred in these watersheds. DWM and CSDM did occur, so there should be a summary of how this information could address question 3 and 4 for Sweetwater and Otay.	CSDM was added to the paragraph where noted. The data assessment is summarized using the available data in Table ES10-3.
23	ES10-3	Port of San Diego	Table ES10-3. For consistency, need to refer to Pueblo San Diego and identify when monitoring data that is being evaluated is from Chollas Creek portion of this subwatershed. On page ES-1, the three sub-watersheds were discussed, so we should stay consistent.	Edits accepted as noted.
24	ES10-5	Port of San Diego	Editorial comments.	Editorial comments accepted where appropriate.
25	ES10-5	Port of San Diego	Was the CSDM data referred to in this comment just from stormdrains in the Pueblo San Diego HU?	Yes.
26	ES10-5	Port of San Diego	State where the CSDM data that is being reviewed is collected.	Location was stated.
27	ES10-8	Port of San Diego	We should be able to do a summary for Otay HU using DWM and CSDM monitoring data. Although we may be limited in what can be said, it is important to provide this for Otay HU.	Because we do not have any receiving water data for Otay HU at this time, we do not feel it is appropriate to evaluate in this section. There was also no indication of CSDM data for the Otay HU in the data set provided. Future monitoring reports will be able to incorporate this data as it becomes available.
28	ES10-8	Port of San Diego	It would be good to have a summation of this paragraph like the summations done for the previous two paragraphs. Does the urban runoff seem to have an affect or not, etc.	This will be able to be done when we have ambient data during the southern monitoring round in Permit Year #3.
29	ES10-9	Port of San Diego	See comment for question 3 for Otay HU.	A brief paragraph was added to summarize Otay Jurisdictional Dry Weather Monitoring (DWM) data.

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30	ES10-9	Port of San Diego	Can anything more be said here about Sweetwater?	Without sufficient data, it is premature to draw any conclusions at this time.
31	10-TOC	Port of San Diego	Organize Table by HU. That way Pueblo San Diego HU is section 10.3, Sweetwater is section 10.4, and Otay is section 10.5, and Overall San Diego Bay Assessment is section 10.6. And all other information falls under one of the four main sections. Carlsbad watershed is a good example of this.	Formatting would lose lower level tier and was not accepted due to San Diego Bay WMA having 3 hydrologic units and Carlsbad WMA having only one hydrologic unit.
32	-	-	Comment withdrawn	-
33	Section 3 and Section 4	County of San Diego	Oceanside Harbor or lagoon is not really part of the SMR watershed- It is really part of San Luis. I am striking out all recommendations about it.	Discussion of Oceanside Harbor will be moved to San Luis Rey Section 4.
34	3-10	County of San Diego	Figure 3-5. No sample location in Riverside County should appear- it is not part of this permit.	This is a reference site (Sandia Creek) that has been monitored several times over the past 5 years. Riverside County areas were dimmed in the GIS figure.
35	Global	County of San Diego	The State of California is developing a Periphyton Index not SCCWRP (SCCWRP is just the contractor). Please make that change throughout the document.	Edits changed throughout document.
36	ES-1	County of San Diego	Editorial comments.	Editorial comments accepted where appropriate.
37	3-30 Global	County of San Diego	CSDM data does not apply to this watershed. Also, CSDM data should be moved to Ambient Condition Monitoring section.	Discussion moved to San Luis Rey (Oceanside Harbor). CSDM data clarified with sentence. See comment #108.
38	ES-3	County of San Diego	Editorial comments.	Editorial comments accepted.
39	3-3, 3-9, 3-11, 3-23, 3-46	County of San Diego	Editorial comments.	Editorial comments accepted.
40	3-13	County of San Diego	Figure 3-6 needs footnote for asterisk on Chlorpyrifos.	Footnote added.
41	3-32	County of San Diego	RHMP section move to Section 4	Section Moved.
42	3-42 (Global)	County of San Diego	Table 3-18, update with Permit Table 3 information.	Table updated.
43	3-44 (Global)	County of San Diego	BLTEA Discussion edits	Editorial comments accepted.
44	ES, ES-15	County of San Diego	The Exec Sum per Permit must be very complete. This one is not. At a minimum- please incorporate the conclusions and recommendations section. Use the same wording (note my comments already sent on this). .	The Executive Summary was updated and overall conclusions and recommendations were added.

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45	ES-1, ES-3	County of San Diego	Editorial comments.	Editorial comments accepted.
46	ES-5	County of San Diego	Figure ES-1. Change map to reflect only San Diego County Portion	Riverside portions of map were dimmed
47	ES11-1	County of San Diego	Please, list the 8 hydrologic areas.	These are included in the overall section but not the WMA ES since it would be more of a laundry list with no reference and would conflict with other sections.
48	ES11-1,-2,-3,-4, 11-7	County of San Diego	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
49	ES-4 (Global)	County of San Diego	Please clarify CSDM program measures	Clarification added.
50	ES4-1,-2,-3,-4	County of San Diego	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
51	ES4	County of San Diego	Table Captions need updating starting at Table ES.4-1.	Captions updated.
52	ES4-3	County of San Diego	Core Management Question 3. There is no interpretation here based on current results... How about other COCs? Trash results/ conclusions?	Because there is limited urban runoff assessment data and mostly open space and agriculture, it is premature to expand upon this at this time. We did not evaluate trash data as it was not collected until summer of 2008 which may be assessed in future monitoring reports.
53	10-86	Port of San Diego	Beginning on page 10-85 and continuing on 10-86, a discussion regarding CSDM occurs. The first paragraph on page 10-86 seems to contradict itself, stating there were CSDM exceedances and then later stating there were no exceedances. Tables 10-36 and 10-37 further elicit the contradiction.	Paragraph was corrected for clarification.
54	10-20, 10-91	Port of San Diego	The paragraph states the following (the bold sentences are confusing in particular): <b>"...However, total metals are not compared to benchmark values the dissolved metals fractions is measured and compared for evaluation of toxic effects. Dissolved metals are compared to the California Toxics Rule acute criteria benchmark. ..."</b> This discussion continues in the summery of the report on page 10-91 in the second to last paragraph. I think a better explanation of how metals were measured is needed.	Sentence was clarified by adding "because" after values.

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55	ES-1	City of Vista	Add bullet for Dry Weather Monitoring, Trash; We also need to comment on ABLM requirements and how we met these. Whether here or elsewhere.	Dry weather monitoring and ABLM information was added, trash was not added because it is a portion of the requirements already listed.
56	ES-3	City of Vista	CSDM section, 2 <sup>nd</sup> sentence. Is this statement of purpose consistent with Workplan submitted Sept 2008?	For the purpose of the Executive Summary, this is a general statement of the intent of the CSDM program.
57	ES-7 Global all WMA ES	City of Vista	Table ES-2, Benthic Invert discussion. also stated in Ambient assessment section, limit to one place.	Bioassessment section limited to only Ambient Section of Table.
58	ES-7 Global all WMA ES	City of Vista	Table ES-2, Can we state which applies; either no exceedance in data collected or no data collected?	Discussion limited to data not analyzed to date.
59	1-3	City of Vista	Last Paragraph, AB411 standard, REC-1 standards are used, AB411 standards may not be appropriate in the lagoons. Delete restaurant discharges.	Added, "or Basin Plan standards" in accordance with the permit. Deleted "restaurant discharges".
60	1-4, 1-5	City of Vista	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
61	1.4	City of Vista	2 <sup>nd</sup> paragraph, The MS4 program is designed to characterize flows from the MS4 that may be contributing to high priority problems. It is not designed to identify sources. The Source ID program will attempt to identify sources contributing to these problems.	Added purpose is "to characterize flows" for the MS4 discussion for clarification.
62	1-4	City of Vista	End of 2 <sup>nd</sup> paragraph, Include timeframes for implementation of programs here. MS4 in FY07-08 and Source ID in FY 08-09.	Added time frame
63	1-5	City of Vista	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
64	1-14	City of Vista	Table 1-1, State why this was not required. Due to development of Bight 08 and contribution of funds to this program?	Clarification added.
65	ES4-3	City of Vista	Question3, Seems like we could include a discussion of dry weather data here. In the conclusions, there are good tables showing constituent exceedance rates but we don't discuss the data in HA sections.	Executive summaries were modified based on Copermittee discussion during the response to comment review.
66	ES4-3	City of Vista	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.

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67	ES4-4	City of Vista	Please exclude, recommendation to relocate is good, Copermittees need to decide best location.	Recommendation of relocation of the TWAS will be revised with less specificity.
68	ES4-2	City of Vista	If there are larger watersheds, how is this the largest WMA in San Diego County?	It is the largest, entirely within the County of San Diego. The WMAs don't extend beyond the County's border.
69	4-32 Global	City of Vista	On this and all DW maps, nutrients are generally run as field analytes. Not sure that these pieces of the pie are accurately depicted.	Map legend was revised for specificity.
70	4-44	City of Vista	Table 4-15. Is there perhaps photographic evidence of the reason for this site being rated as a Threat to Human Health? Light debris is not a typical of a threat to human health.	Threat ratings were based on criteria listed on the field form and is subject to interpretation. It may include nails, or broken glass that were not documented if it was in the check box on the form.
71	4-47	City of Vista	Table 4-17, Under wet weather Integrated summary, strike the recommendation that future MS4 and Source ID programs consider more stringent action levels for monitoring assessments as these programs and related assessments have not been fully developed at this time. The MS4 outfall program is designed to characterize pollutant discharges only and an action level may not be appropriate for the program. The Source ID program has not been fully developed at this time and it is not possible to speculate as to the need for action levels or what action levels are appropriate.	Recommendation removed from table.
72	4-52	City of Vista	4.7.2, Please exclude, recommendation to relocate is good, Copermittees need to decide best location.	Recommendation of relocation of the TWAS will be revised with less specificity.
73	ES5-4 GLOBAL	City of Vista	Question 1. Should this be qualified? There is very little data in the lagoons or Pacific Ocean included in the assessments.	A comment regarding the ability to address the core management questions with the available data was inserted in each WMA executive summary.
74	ES5-4	City of Vista	Question 3. Shouldn't we include DW and CSDM discussion here? These programs collect substantial amounts of data which may be used to answer this question.	They are both part of urban runoff area assessments which are mentioned in the ES section and discussed in the WMA section.
75	5-8	City of Vista	Figure 5-4. Batiqitos Lagoon is not 303(d) impaired, remove red outline.	Figure was revised as requested.
76	5-9	City of Vista	Editorial comments.	Editorial comments accepted.
77	5-12	City of Vista	Loma Alta Spring 2008 Average Flow Rate. Please double check data, seems very high for Loma Alta Creek during ambient conditions.	Flow rates were reviewed and qualified as needed. Several construction projects were implemented downstream of the monitoring station and may have resulted in ponding during this time. The flow

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				equations use a head flow equation and with higher level, we may artificially calculate higher flow. We may be able to resolve this with velocity data to some degree.
78	5-15, 5-42	City of Vista	Why are we monitoring for bioassessment in concrete channels?	This is fairly common in Southern California and regional bioassessment studies planned to be conducted may improve our ability to use these data in the future.
79	5-23 Global	City of Vista	DWM was performed at ... Please strike "investigations" as this implies that upstream investigations were performed at these sites, which is not the case.	"Investigations" was deleted.
80	5-35	City of Vista	Table 5-17. Under integrated assessment for ambient, change to "Turbidity in dry weather runoff 'may be' related to wet weather..." as the linkage is not definitive.	Changed as recommended.
81	5-40 Global	City of Vista	Omit the sentence... "The enterococcus concentration measured during the September TWAS monitoring event was an order of magnitude greater than the 30-day geometric mean enterococcus concentrations from two San Diego reference streams (53 MPN/100 mL and 98 MPN/100 mL) (SCCWRP, 2008)."	Sentence was omitted where applicable.
82	5-80	City of Vista	Figure 5-15. MLS mean ratio for Chlorpyrifos does not seem accurate.	Figure was verified for accuracy. Agua Hedionda TWAS-1 and MLS had Chlorpyrifos exceedances in both wet weather monitoring events.
83	5-95 Sections 5 and Section 7	City of Vista	Table 5-46. Appropriate REC-1 standard is site specific depending on Frequency of Use, there are no beaches in AH Lagoon with a designated High Frequency of Use; most are moderate or infrequently used garnering 276 or 500 mpn/100 ml, respectively. This is in basin plan and has been further fleshed out in previous CSDM Annual Reports as the Lagoon Monitoring Program was developed. These sites should not be compared to Rec-1 AB411 standards.	CSDM Lagoon tables were updated based on additional discussions with the City of Vista and the Coastal Storm Drain Monitoring Workgroup.
84	5-95, 5-96, 5-147	City of Vista	Why is there no data presented in the Loading Analyses? It seems that this section describes the methods but none of the results. It appears incomplete. Don't we have a rain gauge at Agua Hedionda MLS?	Section was renamed to be consistent with other sections as "Constituent Load Estimates". All results are included in the Appendix. This section will require further development in future monitoring reports to determine which questions will be

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				answered with the analysis. The Valley Center rain gauge was used because no continuous rain data was available from the Agua Hedionda rain gauge for years prior to 2007. Only three storm events were captured during previous years and no continuous monitoring was conducted.
85	5-100, 5-103, 5-126	City of Vista	Editorial comments.	Editorial changes made.
86	5-101	City of Vista	Table 5-50. Why are we including 2007 Urban Runoff Programs such as CSDM and DWM here? These are ONLY conducted during dry weather conditions (even if they are during the wet season). This makes the assessment of COC for wet misleading. For example, conductivity and ammonia do not show in storm results but show here as COC during wet weather b/c DWM is included. These should be COC for ambient conditions.	This was a function of the Data Assessment Framework for determining COCs. Urban runoff data are not weighted as heavily as wet weather data. The Regional Monitoring Workgroup will update the assessment process to include the new ambient data.
87	5-127	City of Vista	1 <sup>st</sup> paragraph. Should we run different dilutions to better characterize toxicity between 50 and 100% NOEC?	Additional dilutions would help to refine the toxicity threshold and would only be recommended if TIEs were to be conducted to determine cause and effect relationships.
88	12-1	City of Vista	What about DWM, ABLM, Trash?	Dry weather monitoring was added. ABLM was discussed in ES and Intro as to why it was not a part of the monitoring conducted during 2007-2008. Trash is included as part of monitoring requirements and dry weather requirements.
89	12-2	City of Vista	TDS Discussion. What about groundwater base flows and contribution to TDS?	It is mentioned in the paragraph.
90	12-11	City of Vista	Discussion on Pesticides. Agreed, what about a recommendation for Oil and Grease analyses? One exceedance of 342 samples is not a cost effective measure either.	Analyses are based on permit requirements. Changes to the analyte list will be addressed with the Copermittee Monitoring Workgroup during preparation of the next Report of Waste Discharge.
91	12-12	City of Vista	Table 12-4. A graphic may present this data better.	This will be considered for future monitoring reports.
92	12-13	City of Vista	1 <sup>st</sup> paragraph, second sentence. Please make language consistent with CSDM workplan submitted in Sept 2008.	For the purpose of the conclusion, this is a general statement of the intent of the CSDM program.
93	12-13	City of Vista	Section 12.2.8. Wasn't this random dry?	The data were targeted dry samples conducted by the County of San Diego and City of San Diego.

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94	ES6-2	City of Del Mar	Table ES6-5. Would be helpful to list the anticipated completion date for all the "not developed"	The anticipated dates are available in the 303(d) list and were not included in this table.
95	ES6-3	City of Del Mar	Table ES 6-6. Add a short name at least once for ease of reading or replace heading map with version showing the TWAS and MLS. This summary is difficult to use without a brief summary of the station information/description. The same goes for the following sections with the various stations named.  Also, see Comment for Section 6.3.1.1. – the same sampling station info. table there could be used here.	This comment will be considered in future reports.
96	ES6-4	City of Del Mar	Last paragraph. Is it correct to say "pre-termiteicide" or just termite eradication pesticide application?. Saying.. "this previously banned pesticide" implies it is currently used. Should it be: "this now banned but previously applied pesticide..".  Also.... "may have been released with the numerous homes burned in this subdrainage area".	Editorial comments accepted where appropriate to maintain document voice and style.
97	ES6-5 And 6-59 conclusions.	City of Del Mar	Question 4. Trash. How can we draw this conclusion or statement? Do we mean to say in the receiving waters? Maybe based on the bioassasement site visits and the MLS and TWAS data collected.  What is the basis for the "may occur in localized areas"? May need to revised and stick to the facts collected only.	Fifth sentence was removed from paragraph as recommended.
98	6-11	City of Del Mar	6.3.1.1. Include a table with the specific data for stations that includes the coordinates of the station. Same table can be used in the summary which is missing any information to help the reading identify the general location of the stations, especially the TWAS.	Left unchanged. The stations are depicted in the station location map on Figure 6-5
99	6-11	City of Del Mar	Add a summary table with the dates of all sampling events and locations. Quick reference that shows the site was ambient, wet, etc.	This information is provided in the text in the 1 <sup>st</sup> paragraph of the section. The use of a table to summarize the data will be considered in future reports.
100	6-12	City of Del Mar	Editorial comments.	Editorial comments accepted.

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101	6-12	City of Del Mar	Can the X axis labels be repeated for the top half or the tables split into two? It is difficult to "eye" the bars with the label when they are separated as shown.	This comment will be considered in future reports.
102	6-24	City of Del Mar	Last paragraph. Does this statement refer to the "only" within this watershed or the "only" in the region?	Sentence clarified. It applies to the region and is likely a result of the high ash content from the wildfires.
103	6-25	City of Del Mar	1 <sup>st</sup> sentence. If higher TSS and Turbidity was observed in other watersheds and may be true for the entire region, that would be good to state.	Sentence was added that the "entire region may have been impacted by the high ash fallout during the fires."
104	6-26	City of Del Mar	Table 6-5. Add footnote- definition for "J" qualifier.	Footnote added.
105	6-38 Global	City of Del Mar	Table 6-5. None of the minimums are shown as ND or < the #. Are the 0.01s also ND?	Table edited.
106	6-38 Global	City of Del Mar	Table 6-5. Action level is if <6.5 or >8.5 and Minimum pH value looks too low (0.01)? And Turbidity should be BPJ.	Table edited. (See also Comment 190)
107	6-38	City of Del Mar	Table 6-5. Verify the high Bacteria Count (5,000,000). Were dilutions taken to a >1.6 million MPN? This is unusual.	Table checked for accuracy.
108	6-41 Global	City of Del Mar	Wet Weather MS4 Section. Monitoring is conducted only after 72 hours of dry weather and is not representative of wet weather flows. This is an important clarifying statement and may apply for all WMA sections.	Sentence added for clarification. See Also Comment #37, and #109.
109	6-48 Global	City of Del Mar	Table 6-16. See previous comment on Table 6-15. This data is collected during the wet season but during non-storm (dry) weather.	Sentence added for clarification. See Also Comment #37, and #108.
110	6-57, 6-58	City of Del Mar	Please see comments entered in the WMA Exec. Summary section that is applicable here. And various edits.	Editorial comments accepted where appropriate to maintain document voice and style.
111	ES7-2	City of Del Mar	Table ES7-2. Would be helpful to list the anticipated completion date for all the "not developed"	The anticipated dates are available in the 303(d) list and were not included in this table.
112	ES7-3	City of Del Mar	Table ES7-3. Add a short name at least once for ease of reading or replace heading map with version showing the TWAS and MLS. This summary is difficult to use without a brief summary of the station information/description. The same goes for the following sections with the various stations named.  Also, see Comment for Section 7.3.1.1. – the same sampling station info. table there could be used here.	This comment will be considered in future reports.

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113	ES7-5 Global	City of Del Mar	Recommendations. Might helpful to mention specifically which COCs.	This comment will be considered for future reports.
114	7-5	City of Del Mar	Section 7.2.4. Reference to "Beach Closures" may be obsolete or at least less frequent. As noted below in this same section, the coastal areas have been delisted as of 2006.	Deleted reference.
115	7-6	City of Del Mar	Figure 7-1. Verify legend – specifically the Creek Drainage Area colors they do not appear to match the map colors.	Colors verified.
116	7-12, 7-17	City of Del Mar	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
117	7-14	City of Del Mar	Give the benchmark values, especially since it varies by watershed and sometimes by subwatershed.	The reference to the figure is normalized to 1 for the ratio, the benchmark was not included. All specific data and benchmarks are included in the results tables in the appendix. This comment will be considered for future reports.
118	7-15, 7-25	City of Del Mar	Figure 7-6 and 7-9. Can the X axis labels be repeated for the top half or the tables split into two? It is difficult to "eye" the bars with the label when they are separated as shown.	This comment will be considered for future reports.
119	7-22	City of Del Mar	Reference to Carroll Canyon Discharges. Assuming the water reaching the channel has higher TSS which is not know specifically. Therefore, this sounds a little more speculative than factual.	Statement is based on observations, higher peak flows, and higher TSS results at LPC-TWAS-1.
120	7-22	City of Del Mar	Last paragraph. Suggest removing sentence related to total zinc– it is confusing to say that "despite" high total Zn it is low in dissolved. What really matters is that dissolved did not exceed the CTR.	Editorial comments accepted.
121	7-42	City of Del Mar	Figure 7-19. Legend showing WQO line color should be red to match the graph.	Legend changed as recommended.
122	4-ES	County of SD	I don't see the MLS or TWAS locations shown anywhere on a map.	Station locations are shown on Figure 4-5.
123	4-ES	County of SD	The WMA Executive Summary is difficult to follow without having read the entire watershed chapter first. I recommend the following changes to help with that:  1. Consolidate the first table (Monitoring Program Activities) and third table (Summary of WMA	Changes to the executive summary were made based on Copermittee discussions during the comment review meeting.  Low Frequency of Occurrence Constituent of Concern (COC) is the terminology used for consistency with the Data Assessment Framework.

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#	Section-Page #	Copermittee	Comment	Response to Comment
			<p>Assessment Findings). Include a map of monitoring locations in the ES and chapter</p> <ol style="list-style-type: none"> <li>2. Expand the discussion under each Core Management Question to include everything presented in the full Conclusions and Recommendations section. The ES discussion suffers from over-summarization.</li> <li>3. Find a different term than “low frequency of occurrence COC”. It is confusing for those not familiar with the diamond-rating methodology. It suggests that the COC is not a problem, when what you are trying to say is that it IS a problem. It just occurs at a lower frequency relative to a “high frequency of occurrence COC”. Maybe “lower frequency of occurrence” is a suitable quick fix.</li> </ol>	<p>By definition, a COC is a concern no, matter the frequency. A footnote was added to clarify COCs and to increase the readability of the WMA ES.</p>
124	4-ES	County of SD	<p>Where you make recommendations for future monitoring, please be clear about the purpose of each recommendation (i.e., what would we gain by doing additional monitoring). See for example the first sentence under “Recommendations” on page ES-4 and 4-52.</p>	<p>Comment noted and will be considered in future monitoring reports.</p>
125	4-20	County of SD	<p>Pesticides are the only constituents for which you call out actual concentration data in the text even though the concentrations did not exceed benchmarks. See for example page 4-20. Is there a need for this specificity?</p>	<p>Concentrations were called out for general chemistry constituents and pesticides. We felt the pesticides needed more clarification for relevance to benchmarks in this section since the pyrethroid program was new.</p>
126	ES4-1, -2,-3,-4, 4-2,4-3,4-4, 4-11,4-124-18, 4-20, 4-24	County of SD	<p>Editorial comments.</p>	<p>Editorial comments accepted where appropriate to maintain document voice and style.</p>
127	4-4	County of SD	<p>What is the reference to San Diego County, 2006</p>	<p>Reference is to the Project Clean Water Website and was updated to reflect 2008.</p>

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#	Section-Page #	Copermittee	Comment	Response to Comment
128	ES3-1	County of SD	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
129	ES3-2	County of SD	Table ES3-3. Page 3-41 (Table 3-17) shows Low frequency of occurrence for turbidity. Should this be included? Page 3-39 also calls out COLD beneficial Uses. DOC is called out as Potentially Impairing MUN beneficial Use. Should this be included?	Turbidity and MUN issue added to table.
130	ES3-2	County of SD	Table ES3-3. Table 3-19 (pages 3-43 – 3-44) does not match this BLTEA summary.	Comment noted and text updated as appropriate.
131	3-1,3-2,3-11, 3-13, 3-14, 3-26, 3-30, 3-32, 3-45	County of SD	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
132	3-5, 3-6, 3-10	County of SD	Figure 3-1, Figure 3-2, and Figure 3-5. The creek "DeLuz Creek" should be spelled "De Luz Creek" and the HA "DeLuz" should be spelled "De Luz" and the HA "Oakgrove" should be spelled "Oak Grove".	Corrections made as recommended.
133	3-8	County of SD	Figure 3-4. Nitrate and Phosphorus have been removed for Rainbow Creek 2006 SWRCB Section 303(d) Listed Waterbodies. They are now on TMDL status list.	Figure was revised by removing Phosphorus and Nitrogen.
134	3-14	County of SD	1 <sup>st</sup> paragraph under SMR-MLS-2. The sentence seems not to match the summary statement on page 3-23 regarding the O/E ratio for SMR-MLS-2 – please check.	Statement is correct. The page 3-23 refers to O/E ratios over time which are slightly different than the current monitoring data.
135	3-14, 3-15, 3-16 Global	County of SD	It would be good to convert to $\mu\text{S}/\text{cm}$ to be consistent with the rest of the text.	This comment will be considered in future reports and as directed by the Regional Monitoring Workgroup.
136	3-22	County of SD	Low number for fecal coliform slope of trend. This number seems to be very small – is this correct?	The number was verified to be correct.
137	3-46	County of SD	In reference to the $P=0.005$ . Other chapters show the load reduction. Should the load reduction be shown?	The magnitude of the trend was added for consistency.
138	ES5-3 and ES5-4	County of SD	Table ES.5-3. There is no trends shown for Agua Hedionda – there are results on page 5-110.	The trend is shown in the table in the last cell on the previous page.
139	5-3, 5-9, 5-12, 5-39, 5-40, 5-41, 5-49, 5-69, 5-	County of SD	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.

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#	Section-Page #	Copermittee	Comment	Response to Comment
	70, 5-74, 5-75, 5-93, 5-95, 5-115, 5-117, 5-121, 5-122, 5-125, 5-126, 5-127, 5-129, 5-141, 5-146, 5-157, 5-161			
140	5-3, 5-166	County of SD	Text does not match. Figure 5-1 also shows the San Dieguito Reservoir.	Discrepancy was clarified.
141	5-13	County of SD	Figure 5-13. Change to caption to "Buena Vista Creek Hydrologic"	Change made.
142	5-98	County of SD	Please list the 5 low frequency COCs referenced.	Added text for clarification.
143	5-102	County of SD	Table 5-50 also shows Orthophosphate as a low frequency. List below does not include this COC.	This list refers to the COC <sub>w</sub> , which refers to wet weather COCs. The table shows only dry weather exceedances for orthophosphate and therefore was identified as a COC <sub>a</sub> .
144	5-138	County of SD	Last sentence on page needs clarification. These numbers do not seem to make sense.	The text was clarified.
145	5-147	County of SD	Table 5-75 and 5-76. Add "Escondido Creek Hydrologic Area" to caption	Addition made.
146	5-157	County of SD	Reference to text in last paragraph. Should this be Escondido Creek HA?	Correction made.
147	ES6-2	County of SD	Table ES6-2. Total coliform was identified as a low frequency of occurrence on page 6-45. Total coliform was identified as a low frequency of occurrence on page 6-47.	Total Coliform added to ES table.
148	ES6-3	County of SD	Table ES6-2. Total coliform was identified as a low frequency of occurrence on page 6-47. Bioassessment reference should be should be TWAS-2.	Correction made.
149	ES6-6, 6-1, 6-2, 6-15, 6-18, 6-37, 6-40, 6-41, 6-43	County of SD	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.

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#	Section-Page #	Copermittee	Comment	Response to Comment
150	6-5, 6-10, 6-39	County of SD	Figure 6-1, 6-5, and 6-21. On the map, Sutherland Reservoir is labeled "Lake Sutherland" to be consistent with the text, it should be labeled "Sutherland Reservoir".	Figure 6-1, 6-5, and 6-21 were changed to be consistent with text.
151	6-33 and 6-35	County of SD	Repeated language on page 6-35 – which one is correct?	Corrections made to paragraph on 6-35.
152	6-56	County of SD	2 <sup>nd</sup> , 3 <sup>rd</sup> , and 4 <sup>th</sup> paragraphs need revision. Table 6-22 does not indicate any high-priority (A) ratings for the entire WMA, only B or lower ratings.	Paragraphs revised for consistency.
153	ES9-2	County of SD	Table ES.9-3. Page 9-25 states "DO, total coliform, and fecal coliform were each identified as a COC <sub>a</sub> having a low frequency of occurrence". Summary of Findings should be updated.	Table was updated.
154	9-1, 9-13, 9-17, 9-18, 9-21, 9-22, 9-37	County of SD	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
155	9-6	County of SD	Figure 9-1. The map shows Los Coches Creek as "Coches Creek, Los" – this is incorrect. And the HSA name for 907.14 should be called "Los Coches".	Figure was updated.
156	9-31	County of SD	Table 9-10. Page 9-25 states "DO, total coliform, and fecal coliform were each identified as a COC <sub>a</sub> having a low frequency of occurrence" – see Ambient Receiving Water, Frequency of Occurrence Assessment Findings cell.	Table is correct and refines the cells by ambient receiving water vs. ambient MS4 data. The page on 9-25 is an overall ambient assessment based on both receiving water and MS4 data.
157	ES4-1	City of Oceanside	Reference to "entirely". You mention below that there's a small portion within Riverside County, so is this true?	Section was revised based on other comments.
158	ES4-1	City of Oceanside	Table ES.4-2. Isn't the Pacific Coast TMDL undergoing additional review right now? As opposed to adopted as listed.	You are correct. The RWQCB was requested to revise the TMDL by using exceedance days instead of loads. It is not anticipated to be adopted prior to 2010.
159	ES4-3	City of Oceanside	Question 4 paragraph. This discussion only refers to trash. Do you have info to add about the other pollutants?	In terms of answering the sources of urban runoff question, the discussion was limited to discussing land use which is primarily residential and agricultural in the lower watershed. At this time the only other source information is related to the trash information which can be related to likely or potential sources.

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#	Section-Page #	Copermittee	Comment	Response to Comment
160	ES4-4	City of Oceanside	Why recommend moving the TWAS to a new location? Could you clarify where and why you want to move this one?	Recommendation of relocation of the TWAS will be revised with less specificity. See also Comment #67 and 72.
161	ES4-4	City of Oceanside	Recommend deleting reference to ambient conditions for bacteria. Our exceedances at the mouth are more common during and after a rain event. So I recommend taking out the specific season.	Text left as is. While wet weather bacteria problems are a known issue, if exceedances are commonly occurring during dry weather, it may be best to focus on areas where ponding, regrowth, issues related to over irrigation, or other dry weather sources are accumulating that contribute to wet weather runoff issues for bacteria.
162	ES4-4, 4-1, 4-2, 4-11, 4-15, 4-17, 4-18, 4-24, 4-31, 4-33, 4-34, 4-35	City of Oceanside	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
163	Appendix C	City of Oceanside	Appendix C. The draft didn't have labels and legends on each pie chart. I assume they will for the final.	The legend will be included in the final report.
164	4-3	City of Oceanside	Table 4-1. Can you add all of the Beneficial Use acronyms here?	Only the acronyms used in the text were included.
165	4-5	City of Oceanside	Figure 4-1. Suggest making the HSA boundary lines more visible.	This comment will be noted for future reports.
166	4-27	City of Oceanside	Paragraph discussion. The Mission Road site has not been mentioned in this chapter. Make a reference to Appendix B and add a short description. In Appendix B, there is a check in Table B-4 that says Mission was sampled in May 08, but was it really the Camino del Rey site??	Clarification was added. The data from both sites was combined to show how results have changed over time in that portion of the watershed. The recently added TWAS site was located at the Mission Site which is just downstream of the old bioassessment site at Camino Del Rey.
167	4-34, 4-35	City of Oceanside	CSDM Data seems off for Section 4.	This is likely a function of Oceanside Harbor data being in Section 3. Oceanside Harbor discussion was moved to San Luis Rey section.
168	4-51	City of Oceanside	Question 3 conclusions. What about bacteria, nutrients, and TDS? Can this be brought in from the DWM?	Discussion was expanded to include DWM findings.
169	4-52	City of Oceanside	Recommendations. Why <i>(continue monitoring for)</i> toxic and benthic impacts if no persistent toxicity appears and the benthic impacts are not getting worse?	This is the compliance monitoring required by the Permit and provides a snapshot of conditions on an annual basis and is used to assess long-term trends.

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#	Section-Page #	Copermittee	Comment	Response to Comment
170	ES5-2	City of Oceanside	Table ES.5-2. Why are some of the Pacific Ocean Shoreline Indicator Bacteria TMDLs "In development" and some "Adopted"? Isn't this undergoing another review?	See response to Comment 158.
171	5-18	City of Oceanside	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
172	5-25	City of Oceanside	1 <sup>st</sup> paragraph. I thought the Dry Weather Monitoring Workgroup did not use numeric action levels for conductivity and turbidity. Double check to be consistent with the Jurisdictional programs info.	A footnote was added to clarify the table. See comment 190.
173	5-26	City of Oceanside	Coastal Program, Six CSDM locations are monitored within the LA HA during this time period. Two sites during that period had flowing water to the receiving water, therefore outfall and RW samples were collected at both. The tables should be updated to reflect as indicated in comments.	Tables and text were revised.
174	5-27	City of Oceanside	Seven stations (one station added under new permit) were monitored during the "wet season," but no flow was observed and therefore, none were sampled. Please update so it is clear that we did monitor for CSDM.  Clarify that "wet season" CSDM sampling is still dry weather and preceded by 72 hours of <.10" of rain.	Test was revised. (See also Comment 105)
175	5-28	City of Oceanside	Update the CSDM Program monitoring dates to entire year.  In comparing Table 5-11 and 5-13, I'm unclear as to why some information is in both and not others. If you're presenting it as a reference for the info that went into that season's assessment, do not include the information that did not go in. For example, take DWM out of the wet weather if it's not used and take the post-storm sediment out of the ambient if it was only used for wet weather. Or, alternatively, put all information in and use it in both sections.	We separated out the seasons to be consistent with the receiving water assessments which the CSDM data provides. The DWM data is included in both assessments as it representative of the MS4 system. This is a function of the current data assessment framework, which may be revised by the Regional Monitoring Workgroup. (See also Comment 86 and 108).

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#	Section-Page #	Copermittee	Comment	Response to Comment
176	5-37	City of Oceanside	Conclusion #1, 2 <sup>nd</sup> paragraph. Add another reason for "very poor" rating that it is a maintained, concrete flood channel. (Meaning that our Public Works Dept. maintains it for flood control purposes.)	Text added for clarification as recommended.
177	5-38	City of Oceanside	Question #3. Can you add any of the text from the DWM program from pg 5-25 about urban runoff being localized, etc.?	Text added as recommended.
178	5-38 Global	City of Oceanside	Question #4. How about referring to a more detailed discussion of sources from the DWM Program in each Copermittee's JURMP Annual Report and from the CSDM Program in Appendix F. Just so the reader knows where to find more information.	Text added as recommended.
179	5-38	City of Oceanside	Recommendations. Which additional chemical analytes would you recommend?	This can be considered during preparation of the next Report of Waste Discharge.
180	5-53	City of Oceanside	Coastal Monitoring. I'm not sure how many sites Carlsbad monitored, but we have three coastal monitoring stations for the wet and dry season (visited every month, but only sampled when flowing). And the dry lagoon sites we had two storm drains with one corresponding receiving water site.  We did not have any flowing storm drains during the dry coastal event, so check with Carlsbad to see if you can take out the word "presumably" in the 2 <sup>nd</sup> paragraph of this section.	The data on the number of sites visited and the number of sites sampled was not specified in the data provided by the CSDM Workgroup. However, we refer the reader to the CSDM Report in the Appendix which is an attachment to the report.
181	5-54	City of Oceanside	1 <sup>st</sup> paragraph. Take out "sampled more intensively." Same intensity level, just more flowing storm drains.  Double check numbers. Did Carlsbad sample any outfalls here? Because my results are showing different numbers. Verify for accuracy.  For wet weather CSDM, again just verify accuracy of results.	Text was revised and numbers verified. The data was based on the number of sites sampled in the data provided by the CSDM Workgroup.
182	6-55	City of Del Mar	As I'm looking even more closely at the data and tables in the report in preparation for the WURMP assessments, I noticed Table 6-22 (bottom half - 2006-2008 Assessment) appears to be incomplete based on the data presented in previous tables. Since numerous	Tables were appended to include the toxicity (if persistent) and stressor rating (if very poor).

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#	Section-Page #	Copermittee	Comment	Response to Comment
			assessment protocols and tables are new, it is possible that I'm just missing the point, but could you please verify if Table 6-22 is missing the "stressor group" markings/summary?	
183	ES11-3	County of SD	Reference to the CBI Grant. Funding has currently been suspended.	Comment noted. Text was added to indicate the uncertainty of this program.
184	ES11-4	County of SD	Recommendations. Reference to new programs. Are others beyond the IB Source Study? TJ Trash and Sediment Characterization Study comes to mind.	We were referring to the new permit programs (MS4, Source ID, Pyrethroids, Bight 08, etc...
185	ES11-4	County of SD	Recommendations (liaison). There are several liaison programs already in place including EPA's Border 2012 program and the COBRO program being headed by SANDAG and the International Boundary Commission. Information from these groups should be sought out and incorporated as necessary.	Comment noted. This can be added in future monitoring reports as information becomes available.
186	ES11-5	County of SD	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
187	10-1, 10-18, 10-20, 10-24	City of National City	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
188	10-24	City of National City	Global comment: I would prefer "Statistically significant increasing", which conveys that a certain p value threshold was met, rather than "significantly increasing", which conveys that the magnitude of the trend is very great (i.e., that the slope of the trend line is steep). In many cases it seems that even though a trend may be statistically significant, the degree of the change over time is relatively slight.	By using the term significant, it is in reference to a statistically significant increase or decrease using the Mann-Kendall method. We do state the p value and the Sen's slope where appropriate. We kept significantly to be consistent with the rest of the document.
189	10-24	City of National City	Trend Section. Was there any statistically significant trend for TSS? Either way, since a turbidity trend is being discussed and related to suspended solids, it would probably be good to also include some discussion of the suspended solids measurements (i.e., TSS) too since that data should be available.	There was no significantly increasing or decreasing trend for TSS. This may suggest that fine particulates or color are increasing and more coarse particulates representative of TSS are remaining the same. Review of the TSS Scatterplot for Chollas Creek shows somewhat consistent results with no pattern evident over time.
190	10-29	City of National City	The "action levels" used for conductivity and turbidity in the dry weather monitoring program are best professional judgment, not the ones listed in this table. Since "BPJ" is not easy to do data analysis with, 5,000 uS/Cm and 20 NTU are used for data analysis purposes	Footnote added. (See also Comment 106)

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			in this report. However, it would be helpful to include a footnote or other note explaining that these are not actually the dry weather action levels. I believe a note to this effect was included in previous years' annual monitoring reports.	
191	Section 3 + Section 4	City of Oceanside	<p>As is described in the CSDM Annual Report, technically the RWQCB's boundaries (GIS layer) include Oceanside Harbor into the SMW. The majority of the storm drains are from the City, but there is a small percentage that does get runoff from Camp Pendleton. We are working with the Regional Board on such cases. BUT, we feel the Harbor should be included in the SLR Watershed (based on jurisdiction and historical maps showing a pre-harbor river mouth; although we have not formalized this with the RWQCB).</p> <p>Please include that data with SLR. In looking at the SLR and Carlsbad CSDM data, we'll likely have to sort through what data you're looking at, because I have different results for exceedances and numbers of sites.</p>	Section moved as recommended (See also Comment 33)
192	Appendix I	County of San Diego	MS4: Need table with GPS locations and map.	Table was included with GPS locations and a map will be considered in future monitoring reports.
193	Appendix G	County of San Diego	<p>Hydrographs: Loma Alta- Feb storm- why were so many samples collected at the tail end of the storm?</p> <p>San Luis Rey- Nov 30<sup>th</sup> event- it appears that sampling stopped too soon and the peak of the flow hydrograph was missed. Why? Same question for San Dieguito Nov 30<sup>th</sup> event.</p>	Comment noted.
194	Appendix B	County of San Diego	Replace Table B-14 with the table 3 from the Permit (2007-0001).	Table was replaced
195	Appendix B Global	County of San Diego	<p>There appears to be some confusion over the ABLM Program- please correct this throughout the text:</p> <p>For the 2007-2008 ABLM Program: Per the June 12, 2008 letter from John Robertus of the</p>	Text was revised.

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#	Section-Page #	Copermittee	Comment	Response to Comment
			SDRWQCB, the Copermittees were allowed to redirect the 2007-2008 resources from the ABLM program towards Bight 08 on the eutrophication study in the San Diego lagoons.	
196	Appendix G	County of San Diego	I think Weston missed the first storm because Mother Nature threw us for a loop and the storm was bigger than forecasted. If this is the case- we need to have that documented in this report- I do not see it- I think we sent a letter or e-mail to the RWQCB.	The email notification and letter were included in Appendix G (Hydrographs).
197	ES5-1, ES5-3, 5-10, 5-12, 5-15, 5-24, 5-46	City of Carlsbad	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.
198	ES5-2, 5-9	City of Carlsbad	Table ES.5-2 and Table 5-2. What about San Marcos Lake?	San Marcos Lake was added.
199	ES5-4 Global	City of Carlsbad	What about residential pets?	"Residential pets" was added to the 'such as' list.
200	5-1 Global	City of Carlsbad	5.0 Intro Statement. Reference the Receiving Waters & Urban Runoff Monitoring Program of the permit – otherwise it doesn't make sense later down the report.	Reference was changed as recommended.
201	5-2	City of Carlsbad	Why can they (Core Questions) only be partially answered? Give some reasons/examples.	The permit questions were not intended to be fully answered by a single program. Hence, the term partially answered is applied. This was explained in more detail in Section 1.
202	5-3	City of Carlsbad	Reference to Land Use description. This would be much easier to read in a table – see general comment	The information is in a map (Figure 5-2) and table format in the Appendix C. Section left unchanged, but comment will be considered in future reports.
203	5-3	City of Carlsbad	What is SM Dam? Does it form a lake or reservoir? Is it at Lake San Marcos? Please explain	San Marcos Dam is used to store water for Lake San Marcos. Information can also be found at <a href="http://www.projectcleanwater.org/pdf/car/SMarcos4-5_L.pdf">http://www.projectcleanwater.org/pdf/car/SMarcos4-5_L.pdf</a> .
204	5-9	City of Carlsbad	Lagoon Order Discussion. This is a non-sequitur. How does it relate? Which – SCCWRP or Copermittees? Can we say next monitoring report?	Date was updated to 2007. 2004 was incorrect. It is related to responding to the lagoon order requirements which is why it is mentioned in the Water Quality Problems Section. The discharges listed in the order are submitting monitoring reports. This may be included at the direction of the Copermittees Monitoring Workgroups in future reports.

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205	5-13	City of Carlsbad	Provide more information about tributary area to TWAS – at least some basics that can be drawn from GIS. This comment is true for all TWAS locations in the Carlsbad WMA	The tributary area to the TWAS is defined in the Monitoring location map on Figure 5-5.
206	5-12	City of Carlsbad	Reference to last sentence on Paragraph 2. This comment is for all HA summaries with the same sentence. Should this be a new paragraph? It doesn't read well – are we talking ALL analytes or just metals and pesticides?	It was in reference to metals and pesticides.
207	5-13	City of Carlsbad	Toxicity Paragraph. IS the recommendation to add herbicides to the suite of analytes? If so, it should be stated in recommendations.	We only suggested that other analytes not measured (e.g. herbicides), may be a possible reason for the observed toxicity. This is an issue that the Copermittees Monitoring Workgroup may consider addressing in the future.
208	5-13	City of Carlsbad	Toxicity Paragraph. Can additional potential sources be identified/listed here?	At this time, we do not have sufficient information that would lead to any particular source other than those already listed.
209	5-21	City of Carlsbad	TOC Comment in Sediment. This comment applies to all HA summaries with same sentence. Could it also mean that none/less were generated? Or is there enough evidence to state that it should/would have been there if these two conditions were applicable?	In general, we did see more frequent water column detections of pyrethroids in Urban Areas. However, we observed samples with finer grain sizes had higher concentrations of pyrethroids when detected. The Copermittees will be able to answer this question with a more robust data set in future years as the pyrethroid monitoring program progresses.
210	5-22	City of Carlsbad	5.3.2 2 <sup>nd</sup> paragraph, Shouldn't this paragraph be inserted into all HA summaries? It currently is not.	We felt it was repetitive to have it listed in the same WMA section more than once.
211	5-31	City of Carlsbad	Table 5-14. These comments apply to all HA summary tables. Format suggestions – header rows should be merged so cells aren't individual. Or change color so that it can be read more easily. Why are completed rows with zeroes listed? If these are to be where there was an exceedance?	The tables were left as is for consistency. This comment will be considered in future reports. The zeroes were left to show there were no wet weather exceedances. This applied when dry weather data had an exceedance.
212	5-36	City of Carlsbad	Discussion of TIEs on paragraph before 5.3.5. This applies to all HA summaries with similar or same sentence. If so, then why not recommend skipping the TIE but investigate sources, similar to the findings in the Agua Hedionda HA summary?	Recommendations section was revised based on comments related to Permit Table #3. According to the Permit, if there is evidence to support pyrethroids as the causative agent of toxicity, then a TIE does not need to be conducted.
213	5-38	City of Carlsbad	Question #3. This comment applies to all HA summaries for question #3. What about other pollutants	Discussion revised as recommended for this WMA.

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#	Section-Page #	Copermittee	Comment	Response to Comment
			identified as problems? In this case, TSS, turbidity, and indicator bacteria. They were found in the urban runoff and we should answer the question about relative contributions for all of them.	
214		City of Carlsbad	This comment applies to all HA summaries for question #4. What about other pollutants identified as problems? In this case, TSS, turbidity, and indicator bacteria. They were found in the urban runoff and we should answer the question about sources for all potential sources – or state that this is not the report for such identifications.	Statement was revised as recommended for this WMA.
215	5-47	City of Carlsbad	Reference to Bioassessment. Wasn't the program around before 2001? This sentence may need to be rephrased.	Statement was clarified.
216	5-49	City of Carlsbad	Dry Weather Section Reference to 6 sites. Is this correct? From Fig 5-13 it looks like more.	Sentence was revised.
217	8.35, 7-59, 11-32, 10-95, 10-96, 9-37, ES7-5, 4-52	County of San Diego	Editorial comments on watershed recommendations	Edits made as recommended. (These apply to both the ES and Watershed Recommendations)
218	ES11-4	County of SD	Question #5. Only eight (trends) are listed in subsection 11.3.1.7? Only three (trends) are listed in section 11.3.1.7?	Paragraph was corrected.
219	11-1	County of SD	Section 11.0. Most of this information should be provided in Section 1 Introduction. This section should briefly reference that section and only discuss monitoring that was or was not completed in TJ.	The Copermittees requested this information so that these sections could be stand- alone reports. Context is needed when reviewing each chapter.
220	11-2	County of SD	Section 11.1. What if any of the monitoring completed during the reporting period can be used to address these questions or will we need to wait for every other year of monitoring?	There are several programs that do include monitoring during the alternate years such as Dry weather data, MS4 data, and special studies.
221	11-2	County of SD	Section 11.2. List should included Barret Lake, Lake Moreno, Pine Valley Creek and Campo Creek. If this is watershed based discussion it should include water bodies within Mexico such as Tecate Creek, Rio Alomar and Rodriguez Reservoir.	Text updated.
222	11-2, 11-3, 11-14	County of SD	Editorial comments.	Editorial comments accepted where appropriate to maintain document voice and style.

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223	11-3	County of SD	Beneficial Uses. Discussions of Sensitive Habitat should not be included under this subsection. If necessary to the overall description of the WMA/Watershed then it should be included in a separate subsection.	This comment will be considered in future reports.
224	11-3	County of SD	Beneficial Uses Discussion of Barret. Interesting that this is noted here but that there is no discussion regarding the impacts or affects of transferring this water to another watershed. Also most water released from Morena also goes to Barrett and on to Otay as well. Should check with City of San Diego Water Department for more specific information regarding these transfers.	This comment will be considered in future reports.
225	11-9	County of SD	It is stated above that CSDM monitoring did not occur during this reporting period? On Figure 11-5, The figure does not include the Bioassessment Sites for this WMA. Previously there were two stations in the WMA? Also there appears to be no CDMA points within the WMA so will there or will not there be future CDMA monitoring>	According the CSDM Program, the cities in TJ Watershed report that no storm drains flow during nonstorm events and therefore, in accordance with the Permit, no CSDM monitoring is conducted in the TJ Watershed.
226	11-11	County of SD	Is this ( <i>DWM data</i> ) provided in an appendix if not where can this data be found?	Dry weather monitoring data is provided in Appendix N and in the Jurisdictional Urban Runoff Monitoring Program Annual Reports for each jurisdiction.
227	11-11, 11-16	County of SD	Reference to CSDM data for TJ WMA. Not sure this is available for this WMA?	There is no CSDM Program within Tijuana WMA. Text was revised to remove CSDM information.
228	11-22	County of SD	Table 11-6. This table would be much more readable in 8.5X 11 landscape format.	This will be considered for future reports.
229	Overall Comment	San Diego County Regional Airport Authority	In references to the Airport Authority, our name is incorrectly written. The formal name for the Authority is "San Diego County Regional Airport Authority." In most places I noticed in the report the word <b>County</b> had been left out of our name. The proper abbreviations are either SDCRAA or Airport Authority.	Naming was revised as recommended.