

Appendix O - Response to Copermittees' Comments on the Draft San Diego County Municipal Copermittees 2008-2009 Urban Runoff Monitoring Report

#	Section-Page #	Copermittee	Comment	Response to Comment
1	9-ES-2	Santee	Delete additional period in middle of first paragraph.	Change was made as requested.
2	Table ES 903	Santee	Some of the constituents of concern listed are not watershed priority pollutants. Our assessment should address these, not recently proposed 303(d) additions.	Ambient and MS4 assessment tables were revised based on other Copermittee comments. However, some analytes are a result of ambient and MS4 concentrations greater than receiving water benchmarks and not based on 303(d) additions.
3	Table ES 903	Santee	3 rd party data from Santee was approved by the RMG for inclusion. Why was it not included?	Third party data from the San Diego River was included in the assessment section 9.3.1.9 and was summarized in the table. The third party study for Forester Creek was also added to the section and to Table ES-9-3.
4	9-ES-4	Santee	The third paragraph disregards the improved bioassessments data in Forester Creek since it was improved. This should be included in the discussion, as the report (here and in other places, as I will identify later) seems to focus on the negative and not acknowledge the positive.	Sentence was added to the paragraph describing bioassessment results for the Forester Creek Restoration Project. The Grant Project Study results were also added to Section 9.3.1.9.
5	9-ES-5	Santee	Fourth paragraph, insert after "is not isolated to one area" the phrase "although better bioassessment scores have been reported in a portion of Forester Creek."	Sentence added as recommended.
6	9-ES-6	Santee	Delete "Drought restrictions implemented in Summer 2009 may have helped to reduce flows from some areas." We don't know if these would be normally flowing as this is the first year that we have been implementing the random sampling program.	Deleted from both Executive Summary and conclusions as recommended.
7	9-ES-7	Santee	"Environmentally relevant concentrations" – what do you mean? Pyrethroids were at concentrations known to be toxic to benthic macroinvertebrates? Be specific about how this is "environmentally relevant."	Sentence was revised to "concentrations above published toxicity benchmarks for aquatic invertebrates." (also in the conclusions section of the WMA Section)
8	9-ES-7	Santee	Delete "associated with residential lawn water." Perched water can be present for other reasons (i.e., natural).	Sentence revised as recommended. (also in the conclusions section of the WMA Section)
9	9-ES-8	Santee	Second paragraph, start the sentence with "With the exception of monitoring after the Forester Creek Improvement Project."	Sentence revised as recommended. (also in the conclusions section of the WMA Section)
10	9-ES-8	Santee	Last paragraph is vague. Which (and where) are the upstream sources? Note that source should be plural.	The monitoring workgroup uses the recommendations from the permit triad table of

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				recommendations. Sentence revised to plural form as recommended.
11	9-9-1	Santee	Insert "Regional" prior to Source Identification Program in the penultimate bullet.	Added Regional as recommended.
12	9-9-5	Santee	Section 9.2.4 discusses factors that may be impairing water quality in the watershed. POTW discharges should be added (will likely affect TDS at a minimum).	Added: publically owned treatment works (POTW).
13	9-14	Santee	Where were the three ambient monitoring locations?	The three ambient monitoring locations are provide on Figure 9-5.
14	Table 9-4	Santee	Delete "Carlsbad" and replace with "San Diego River."	Replaced caption.
15	9-22	Santee	State "The O/E ratio was 0.85, which implies ..." Finish with the first sentence. This reads negatively in its current form.	Text modified as requested. to "The O/E ratio was 0.85, which implies that the BMI community has lost an estimated 15% of the biodiversity expected at the site, and it was unimpaired."
16	9-31	Santee	Add "r" to Rive in first paragraph.	Change was made as requested.
17	9-38	Santee	Third paragraph, insert hyphen between gravel and sized.	Change was made as requested.
18	9-42	Santee	Outer most should be outermost.	Change was made as requested.
19	9-42	Santee	Insert hyphen between naturally and occurring.	Text left as is, "ly" words should not be hyphenated.
20	9-43	Santee	9.3.1.9: Delete "both" in first line, and delete "- and the County of San Diego" at the end of the sentence.	Change was made as requested.
21	Figure 9-11	Santee	CST_SDRCH not shown on figure. Add.	CST_SDRCH is now identified with site label.
22	9-55	Santee	Santee ambient data should be discussed here.	The Forester Creek Restoration Project summary was added to this section
23	9-56 (actually 58)	Santee	Change bellow to below.	Change was made as requested.
24	9-60 (actually 62)	Santee	Insert "in urbanized areas" after ICIDs in third paragraph.	Change was made as requested.
25	9-60	Santee	Third paragraph, recommends going up into the watershed for sampling, but this urban runoff program should be looking at discharges from urbanized uses. Appears to be outside the scope of our program. Review recommendation.	Recommendation was removed.
26	Table 9-20	Santee	907.11 had a rating of high threat to aquatic health at a location that was considered to be "Optimal."	The provided data do not specify the characteristics of the threat to aquatic health. However, using the

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			Doesn't make sense. Please check.	template trash assessment form would allow for a site to be considered optimal while also presenting a potential threat to aquatic health.
27	9-63 (actually 65)	Santee	Replace "better" with "more consistent" in third paragraph.	Change was made as requested.
28	9-72 (actually 73)	Santee	Insert an "s" after follow in the second line (make it follows).	Change was made as requested.
29	9-76 (actually 78)	Santee	Insert "water" between "receiving" and "benchmarks" in fourth paragraph.	Change was made as requested.
30	9-76	Santee	Fifth paragraph, it would be helpful to insert a comment that TDS in MS4 dry weather runoff may originate from the water supply (potable and recycled water).	Comment added as follows "Elevated TDS in MS4 dry weather runoff may originate from permitted dewatering activities (County of San Diego, 2006) or as a result of water supply and delivery practices (potable and recycled water).
31	9-77	Santee	Delete "however, Famosa Slough in the Lower San Diego HA is listed for eutrophic conditions, suggesting elevated levels of nitrogen and/or phosphorous compounds." Although there may be some influence from the river, it will not be as direct as this sentence infers.	Sentence deleted
32	9-77	Santee	The first paragraph needs to have a comment that nitrates have been reported above the dry weather monitoring action level in groundwater samples collected from various locations around the watershed. Therefore groundwater is a potential source of nitrates in the river.	Comment added to indicate nitrate from groundwater as a potential source to receiving waters.
33	9-77	Santee	The third paragraph would benefit from a comment relating to the potential non-human sources such as plant matter. This would help explain the discrepancy between the number of samples with fecal coliforms greater than the benchmark versus the number of enterococcus samples greater than the benchmark.	It is not appropriate to add in a comment regarding the potential for natural sources here since it would imply that that was the cause – we have no scientific evidence that this is the case. It would be an assumption.
34	9-78	Santee	The third paragraph references various sampling locations, but it was not clear where these samples were collected. Refer to a figure or describe.	Sampling sites are located on Figure 9-23 near the top of the map in 907.23
35	9-88	Santee	Use gauge, not gage.	Change was made as requested.
36	9-89	Santee	Section 9.5, substitute watershed managers with	Change was made as requested.

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			Copermittees.	
37	Table 9-27	Santee	Why is selenium now part of the mix? Do not address unless it is a watershed priority pollutant. Leave the IBI rating for 08-09 blank if data was not detected.	The ambient assessment has been removed from the report due to one year of sampling data.
38	Table 9-27	Santee	I would like to better understand what this table is supposed to show. Please can you discuss at the Copermittee review meeting.	Table was discussed.
39	9-97	Santee	Third paragraph disregards the great data that has been reported at other locations in the watershed (i.e., at the Forester Creek Improvement Project). Include.	Sentence added to note "However, improved bioassessment scores have been reported in a portion of Forester Creek as a result of recent restoration activities associated with the Forester Creek Improvement Project.
40	Table 9-31	Santee	Low frequency of occurrence of TDS in wet weather samples, may be indicative of potable water as a likely source. Consider incorporating that thought into the text.	Comment noted. Linkage between TDS and potable water is known but it would be speculative to suggest that decreased TDS during wet weather was due to decreased presence of potable water.
41	9-99 (101)	Santee	Replace managers with Copermittees.	Change was made as requested.
42	9-99 (101)	Santee	Remove "the" between "as" and "data."	Change was made as requested.
43	Table 9-32	Santee	Under "Integrated WMA Assessment Summary" insert "and discharges" after "potential recycled water uses." Note that Padre Dam reportedly discharges approximately one million gallons of treated water into the river per day at some times of the year.	Text was changed in the integrated assessment since the ambient assessment was removed.
44	9-101(103)	Santee	Delete "However, it should be noted that" in the third paragraph prior to "the State of California is currently."	Change was made as requested.
45	9-101 (103)	Santee	Lower case c in consideration in last paragraph.	Change was made as requested.
46	9-101(103)	Santee	Replace "continuation of" with "continuing" in last paragraph.	Change was made as requested.
47	9-102 (104)	Santee	Replace "programmatic" with "planning of" in first full paragraph.	Change was made as requested.
48	9-102 (104)	Santee	Replace "managers" with "Copermittees."	Change was made as requested.
49	9-104	Santee	In the second paragraph of 9.6.1 point out that other locations (such as the area recently improved in Forester Cree) have had higher IBI scores.	Sentence added to discuss Forester Creek Improvement Project results.
50	9-104	Santee	The penultimate paragraph talks about samples from a "site", but it is not clear what is being discussed.	Added text to indicate the site refers to the MLS.

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			Please clarify.	
51	9-105	Santee	“was good for bacteria and TSS.” (Second line). Does not make sense. Please clarify.	Text modified to “The Bight 08 program also determined that, with the exception of DO in very localized areas, water quality was good with low concentrations of bacteria and TSS.”
52	9-105(107)	Santee	Outer most – make one word.	Change was made as requested.
53	9-108 (11)	Santee	Insert “reported” before “assessments” on second line.	Change was made as requested.
54	Figure 9-10	Santee	Some dry weather monitoring locations in Santee (J30d) are reported to have not had trash assessments. This is incorrect. Trash assessment data were reported for all locations. Our datasharing file is attached for your information..	Locations that were shown to have no trash assessments were sites from ICID program and have been removed from maps.
55	1-3	Cnty SD_Tracy	Permit Goal 3 – Last Sentence, replace the word “these” with “synthetic pyrethroids”	Change was made as requested.
56	11-ES6	Cnty SD_Tracy	Should delete references to CSDM as it does not occur in this watershed. Or at least make a note of it in the report.	References to CSDM are deleted where applicable
57	11-1	Cnty SD_Tracy	Paragraph 1 after 4th sentence; add “Coastal Stormdrain Monitoring (CSDM) does not occur in this WMA.”	Revised text to: “During the 2008–2009 Monitoring Season, receiving water monitoring, coastal storm drain monitoring and bioassessment monitoring were not conducted in the Tijuana River WMA.”
58	11-3	Cnty SD_Tracy	Section 11.2; “Barret” should be spelled “Barrett”	Change was made as requested.
59	11-3	Cnty SD_Tracy	Section 11.2; “Moreno” should be spelled “Morena”	Change was made as requested.
60	11-4	Cnty SD_Tracy	Section 11.2.3; “Lake Barrett” should be “Barrett Lake”	Change was made as requested.
61	11-10	Cnty SD_Tracy	Section 11.3; Delete “Coastal storm drain monitoring (CSDM) (CSDM Program).” This does not occur in this watershed.	Deleted text for this occurrence
62	11-10	Cnty SD_Tracy	Section 11.3; Regional Source ID probably should be deleted as it has little or no value to this particular watershed.	Bullet was left unchanged per the Copermittees 12/15/09 meeting. The program was applicable to all WMAs.
63	11-40	Cnty SD_Tracy	Section 11.3.2; “Pueblo San Diego WMA” change WMA to HA. Pueblo is a portion of the San Diego Bay WMA.	Changed text to read: “was conducted in only two areas (Los Peñasquitos Creek WMA and Pueblo San Diego HA).”
64	11-41	Cnty SD_Tracy	Section 11.3.2; Please delete “and CSDM” this monitoring does not occur in this watershed.	Text deleted

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65	11-45	Cnty SD_Tracy	Second paragraph replace "Portero" with "Potrero".	Change was made as requested.
66	11-51	Cnty SD_Tracy	Section 11.3.2.2; Please check Figure Number "11.4" for accuracy.	Map is consistent with 2006 303(d) list.
67	11-66	Cnty SD_Tracy	Section 11.3.2.3; This watershed does not participate in the CSDM program.	Text revised to "This watershed does not participate in the Coastal Storm Drain Monitoring Program."
68	Table 13-8, 13-25 Table	Cnty SD_Tracy	Tijuana River Wet Weather Action - Address upstream sources as a high priority. Can you provide clarification – do you mean within Baja California or the upper areas of the watershed within the County or both?	The recommendation is derived from the language in the Permit. In this case upstream sources would mean within the watershed upstream of the MLS and within the County's jurisdiction.
69	ES-12 to ES-13, 10-55	City of National City	<p>"The relative amount of trash recorded at each site was determined using trash ratings, since each rating has a quantitative component (e.g., less than ten pieces for the Optimal rating)." and "greatest proportion of trash ... greatest amount of trash in the HU."</p> <p>Although numbers of trash pieces are provided in rating descriptions, trash ratings are more qualitative than quantitative. The rating is affected by the size of the area being evaluated and relative size of trash pieces. We may not be able to extrapolate a true "amount" of trash from assessment scores.</p>	Agreed that the trash assessment does not account for the true "amount" of trash from the assessment scores, but the field assessments were based on the amount of trash at the site at the time of inspection. The language used for the assessment was taken from the approved Work Plan and it is stated that the surveys were a qualitative assessment of the presence of trash at the time of the assessment. The text is consistent with these assessment parameters.
70	Table 10-8	City of National City	Total N = Nitrate as N + Nitrite as N + TKN; This table shows Total N less than TKN. (It appears that Total N may have been calculated as the sum of Nitrate and Nitrite, missing TKN.)	This summed Total Nitrogen was updated in the table.
71	Figure 10-24 (pg 10-58) Figure 10-34 (pg 10-130), Figure 10-41 (pg 10-178)	City of National City	Some locations marked with "No Trash Assessment" appear to be located within the City of National City. If these are dry weather sites, please let us know which and we may be able to provide you with the data.	Locations that were shown to have no trash assessments were sites from ICID program and have been removed from maps.
72	10-57	City of National City	188 dry weather monitoring site visits made in Pueblo San Diego Watershed but only 185 trash assessments; if any sites in National City, Chula Vista, or Lemon Grove are missing trash assessment information, please let us know which and we may be able to	No trash assessments were found to be missing for National City, Chula Vista, or Lemon Grove.

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			provide you with the data.	
73	10-57, 10-59, Table 10-49	City of National City	<p>“2008–2009 Monitoring Season was the first year that the trash rating system was used,” which equates to Summer 2008.</p> <p>Our understanding is that some MS4 Outfall Monitoring took place in 2008, but the majority of the dry weather component took place in the Summer 2009. Parts of the text refer to the “2008-2009 Monitoring Season” as Summer 2008 for dry weather monitoring but Summer 2009 for MS4 outfall dry weather monitoring.</p>	In the jurisdictional dry sections, the dates have all been changed to 2008 for consistency.
74	10-87	City of National City	“Based on wet weather conditions, conducting a TIE to identify COCs, based on TIE metric and addressing upstream sources as a high priority are recommended” Sentence is confusing.	Text has been modified for clarity.
75	Table 10-38 and DW tables for other watersheds	City of National City	Conductivity action level is written as 5 mS/cm; Turbidity action level written as 20 NTU; Since the action level for both of these is technically not numeric, but actually Best Professional Judgment. As has been noted in previous years, a footnote can be added explaining this for clarification.	A footnote has been included with each table as recommended.
76	Tables 10-44, 10-45	City of National City	Unclear why some Orthophosphate as P values are lower than Total Phosphorus values. A footnote explaining why may be helpful.	Added footnote to table 10-44: In cases where orthophosphate results are greater than Total P, this may occur when results are near the detection limit and the variability of the analytical method may play a role.
77	Table 10-61	City of National City	CT-OTY03, 6/16/09 – Total Nitrogen value is less than the sum of TKN + Nitrite as N in this case. Consider adding a footnote to explain.	Data were reported as received from the Copermittees, based on those data it is not known whether total nitrogen was a sum of the nitrogen elements, or if it was analyzed separately by the laboratory as total nitrogen. Therefore, the sample result was reported as received.
78	General Comment	City of National City	<p>Some minor things—you may want to:</p> <ul style="list-style-type: none"> - rerun spell-check - search the document for places with 2 periods in a row “..” and “?.” And “. - search the document for extra spaces - check for consistent capitalization (ES-13 	Changes were made as requested.

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			“Littering” “Dumping” capital in one paragraph but not subsequent one)	
79	ES-7 and 10-83	City of National City	<p>“During wet weather high frequency COCs include turbidity, TSS, total coliform, fecal coliform, enterococci and Bifenthrin, This suggests that ...” missing period or semi-colon</p> <p>“While Chollas Creek is not currently listed as a REC-1 waterbody, it [is] listed as having a potential REC-1 Beneficial Use.” missing word</p>	Changes were made as requested.
80	10-125	City of National City	“Table10-38shows the dry...” Needs space after 8	Change was made as requested.
81	10-162	City of National City	“20082009 Monitoring Season” needs “ - ”	Change was made as requested.
82	Table 12-11, (pg 12-13)	City of National City	Number of Nitrate as N samples is less than number of Total Nitrogen samples, even though Nitrate as N is needed to calculate Total Nitrogen. Is it because some Total Nitrogen calculations were based on “Nitrate/Nitrite as N” (which doesn’t differentiate between the nitrate and nitrite content)?	Yes, the total number of nitrate as n samples is less than the number of total nitrogen samples because of the nitrate/nitrite as n samples.
83	Tables 12-18 and 12-19 (pgs 12-28 and 12-36)	City of National City	Unclear why some Total Orthophosphate as P values are lower than Total Phosphorus-Low Range. A footnote explaining why may be helpful.	Added footnote to table 12-18: In cases where orthophosphate results are greater than low-range Total P, this may occur when results are near the detection limit and the variability of the analytical method may play a role. Table 12-19 has slightly larger loads for the samples where orthophosphate was slightly higher than the low-range total phosphorus because of the slightly higher original concentration.
84	ES.1-2	County of San Diego	Remove the CSDM reference under the Bight 08 Coastal Ecology section	Removed as requested.
85	ES-8	County of San Diego	Remove all references to CDSM in the Santa Margarita Watershed. This program is not conducted in this watershed under this Permit.	All references to CSDM program removed from text.
86	ES-9	County of San Diego	Remove the following sentence:’Future MS4 Outfall Monitoring and Source Identification Monitoring may be best focused in the areas of the Lower Ysidora	Text has been removed.

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			HSA” This particular HSA is not under the jurisdiction of the County of San Diego and therefore, is not included in the Permit.	
87	ES-9	County of San Diego	Remove the two sentences:” For the next full round of Permit monitoring in north San Diego County...used in future monitoring reports based on availability.” The MLS station was moved off of Camp Pendleton last year—there is no need to bring this up again.	Sentence has been removed.
88	ES-9	County of San Diego	The recommendation for Bifenthrin should be modified as follows to better match the how the results are presented in the text (the one hit of Bifenthrin did not result in toxicity): “ During the next sampling cycle in Santa Margarita, continue to monitor for pyrethroids, especially Bifenthrin in sediments to confirm its persistence.” Remove the sentence “ Based on wet weather conditions, addressing upstream sources of Bifenthrin...”	Specific references to Bifenthrin were removed from the recommendations based on laboratory intercalibration inconsistencies of pyrethroids presented by the Copermittees.
89	3-9	County of San Diego	General comment- The TMDL for total N and total P in Rainbow Creek is only brought up once or twice- it is not shown on the map on Page 3-9.	Approved TMDLs are now identified on 303(d) maps for San Diego Bay WMA and Santa Margarita River WMA.
90	3.3.1.7, 3-32	County of San Diego	Rephrase the one sentence as follows:” Third party data were not provided for inclusion in the report for the Santa Margarita River WMA.”	Text adjusted.
91	3.3.2 – 3-33	County of San Diego	Remove references to the CSDM data- not collected in this watershed as part of the Permit.	Text removed.
92	3.3.2.1 -3-36	County of San Diego	Remove the sentence” Because there are few urban land uses, it appears that the number of dry weather sites is sufficient to meet the intended goals of the DWM Program.” This program is a jurisdictional program and is outside of your scope.	Sentence removed.
93	Figure 3-16	County of San Diego	The MLs drainage area does not include HSAs 905.52 and the adjacent HAS- there are impoundments in Riverside County.	HSA 905.52 should have been labeled 902.52 and has been corrected. Vail Dam was added to map, and MLS drainage area was redelineated to exclude area upstream of dam.
94	3-48	County of San Diego	If theMS4W-SMR-02 drainage area includes the entire drainage area for MS4W-SMR-12- please state so in the text. Fig 3-18 suggests this is true.	Text adjusted to: Site MS4W-SMR-02, together with drainage from Site MS4W-SMR-12, has the largest drainage area and this may account for the elevated constituent loads

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95	3.5.2	County of San Diego	Please modify the discussion for Bifenthrin- one data point should not drive the assessment - consider that at least three years of data should be collected before applying a rating priority system (the same that we have assumes for trash).	The discussion on Bifenthrin has been removed from the text.
96	3.5.4	County of San Diego	In light of comment 12(#95) - please modify Bifenthrin recommendation.	Text modified as recommended (also see comment #88)
97	3.6.2	County of San Diego	See comments 3, 4 and 5 (#86, #87, and #89) - Please incorporate these in the Recommendations section.	Comments incorporated as requested.
98	13.3.1	County of San Diego	See comment 14 (#97) – Please incorporate changes into this section.	Comments incorporated as requested.
99	Exec Sum, Table ES-7, ES-22	County of San Diego	Under Bight 08 please place in parens “(San Diego River Estuary)”, Under Third Party Data, please list the data sets. This will help provide context for the reader as to where in the watershed the data were collected.	Text added to Table 9-3. Data sets are presented in parentheses in Table 9-3
100	9, Table ES.9-3, ES-3	County of San Diego	Same changes as in comment # 1 (#99)	Added text to table as requested: (San Diego River Estuary)
101	9, Table ES. 9-2, ES-2	County of San Diego	After Adopted insert ”and withdrawn by SDRWCB for additional revisions”	Text added.
102	9,ES-7	County of San Diego	<p>Please reword the underlined portion of the following sentence to make it more explicit:” Results indicated that synthetic pyrethroids were commonly detected in direct runoff in environmentally relevant concentrations.”</p> <p>Please remove “which may be a result of perched groundwater tables associated with residential lawn watering.” Unless there are facts to support this. I find groundwater infiltration as an issue in the County’s MS4 in San Diego River- and the signature does not suggest potable water runoff from residential overwatering.</p>	Reword the last paragraph in section 3 as follows: “During the CDSM Program, no flow was observed at the one storm drain historically sampled; therefore, during dry weather, the coastal storm drain within the San Diego River WMA is not discharging to the receiving water.” Please remove the last sentence of the paragraph.
103	9, ES-8	County of San Diego	Please remove: “Specific recommendations for the San Diego River WMA are based on the triad assessments listed in the Permit. Based on ambient and wet weather conditions, addressing upstream source as a high priority is recommended.” This is redundant with the previous paragraph.	Text deleted.

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104	9, ES-2	County of San Diego	Please remove "...with the exception of Chollas Creek that is monitored each year" Chollas Creek is not in this watershed.	Change was made as requested.
105	9, 9-17	County of San Diego	Please remove "which have historically been problematic region-wide during wet weather" or cite the data source. The regional monitoring program does not measure chloride in storm water discharges.	Change was made as requested.
106	Table 9-3, 9-15	County of San Diego	Please footnote the total N and total P benchmarks and indicate that these are narrative standards with these values as goals. See the Basin Plan for wording. This extends to all watershed sections.	Footnote was added as requested.
107	Table 9-21, 9-67	County of San Diego	Change the table column heading from WQO to Benchmark. Please footnote Total P and Total N as narrative objective per comment # 8. Please modify title to include "Water quality benchmarks used for comparative purposes to answer the question "Is urban runoff contributing to receiving water problems?" " Please make this change for all watersheds.	Tables revised as requested.
108	Table 9-24, 9-81	County of San Diego	It is confusing to have tables with analytes listed that appear not be analyzed. Please remove analytes that are not part of the various MS4 sampling programs. This applies to all watersheds.	The targeted MS4 tables span several pages, and the analyte list on the left is defined for the entire table. Therefore, a "NS" was included in the blank cells because those analytes were analyzed for at least one station in the watershed and therefore the analyte list needs to remain consistent from page to page.
109	Table 9-29, p. 9-93	County of San Diego	It seems that to base a three diamond rating on one grab water sample seems at odds with the weight of evidence approach Perhaps a more reasonable approach is to recommend additional monitoring for chloride, sulfate and manganese, if funds allow, and remove the diamond rating as there are not sufficient data to use this assessment.	The diamond rating for this part of the report has been removed from the text.
110	Section 9, Page ES-2	County of San Diego	Double period at the end of the second sentence of page.	Change was made as requested.
111	Section 9, Page ES-8	County of San Diego	Third paragraph – incorrect grammar "toxicity been observed..."	Change was made as requested.
112	Section 9, Pages 9-7, 9-10, and 9-80	County of San Diego	All three maps spell Forrester Creek as "Forester Creek".	Spelling changed to Forrester on maps.

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113	Section 9, Page 9-13	County of San Diego	Last paragraph – “Site 01990” should be shown as “SMC-01990” for consistency.	Corrected.
114	Section 9, Page 9-20	County of San Diego	Forrester spelled wrong in photo description.	Change was made as requested.
115	Section 9, Page 9-21	County of San Diego	Table 9-4 says Carlsbad Watershed in the title, Forrester spelled wrong, and first site name is incorrect should say “SMC 02006”.	Text changed as requested
116	Section 9, Page 9-26	County of San Diego	Last paragraph – “50,000 MPL/100 mL, over ten times greater...” – should be 125 times greater.	Text adjusted to correct.
117	Section 9, Page 9-30	County of San Diego	Figure 9-8 – Should the dissolved copper graph show a trend line with confidence intervals, if we are stating that there is a decreasing trend? If not, maybe some more explanation is needed.	There is no Sen's slope estimate or confidence intervals on this plot because the proportion of non-detects was greater than 15%. We are able to report that the trend is decreasing, statistically, but not estimate the magnitude of the trend because of the proportion of non-detects. The rationale for this methodology is explained in the methods section, Appendix B.
118	Section 9, Page 9-44	County of San Diego	Bullet # 4 – punctuation – should be “San Diego’s jurisdiction”.	Corrected.
119	Section 9, Page 9-52	County of San Diego	First paragraph – site names should read COSDSDR08 not SDR08 and COSDSDR10 not SDR10.	Corrected.
120	Section 9, Page 9-53	County of San Diego	Figure 9-16 – Site SDR-08 should read COSDSDR08.	Corrected.
121	Section 9, Page 9-54	County of San Diego	Figure 9-17 – Site SDR-10 should read COSDSDR10.	Corrected.
122	Section 9, Page 9-59 to 9-60	County of San Diego	Table 9-18 says “... 2008 Dry Weather...” and Table 9-19 says “... 2008-2009 Dry Weather...”, also the first paragraph says “... sampling conducted in 2008-2009.” Please make sampling period consistent.	Date corrected in table
123	Section 9, Page 9-60	County of San Diego	Delete the following paragraph beginning “Very few jurisdictional dry weather sites were located in the upper watershed....The dry weather program is a jurisdictional program and was approved as part of the JURMP.	Paragraph has been deleted
124	Section 9, Page 9-66	County of San Diego	Last paragraph – site should say “MS4D-SDR-13” not MS4DSDR-13.	Corrected.
125	Section 9,	County of San	Third paragraph – check punctuation on	Change was made as requested.

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#	Section-Page #	Copermittee	Comment	Response to Comment
	Page 9-76 (actually 78)	Diego	"...problem(s)?"	
126	Section 10 Overall	City of Chula Vista	Check for misspelling and punctuation throughout	Change was made as requested.
127	Section 10, ES-1	City of Chula Vista	Table ES 10.1 is missing check marks for MS4 Outfall Random Wet and Dry Monitoring in Otay.	Corrected.
128	10-14	City of Chula Vista	In section 10.3.4.1.1 mention the section of the Permit where it states that ambient monitoring is not required.	Reference to Section II.A.1.b of the Permit was added as recommended.
129	10-44	City of Chula Vista	Please clarify if 100% of copper from aerial deposition is discharged in storm water runoff.	The statement refers to the measured load of copper that deposits on surfaces of the watershed is equal to or greater than the load that washes off as reported from modeling results. While there are many other sources that contribute to copper in runoff, aerial deposition is a significant source. The sentence was revised to indicate that aerial deposition can contribute to up to...
130	10-51	City of Chula Vista	Please clarify in the text if each dot and each pie symbolizes a DWM site, since some of them overlap.	Text states: "The Jurisdictional DWM sampling sites in the Pueblo San Diego HU are shown on Figure 10-5 Error! Reference source not found. The results are depicted on Figure 10-23 as small circles for field screening results and as pie symbols for laboratory analytical results."
131	10-56	City of Chula Vista	Table 10-13 has columns for numbers of sites and numbers of samples. Since this is trash monitoring and there are no real "samples," should it be listed as number of assessments instead?	The column header "samples" was changed to Number of Assessments as recommended.
132	10-61	City of Chula Vista	In section 10.3.4.2.3 it is not clear why data for Pueblo MS4 random wet weather data is in the Sweetwater Section.	The random sites were limited in the WMA so they were combined into the Sweetwater Section for comparative purposes.
133	10-79	City of Chula Vista	Table 10-21 - make sure that bottom rows and columns of table are merged so that the remarks are all visible.	Tables were revised as recommended.
134	10-110	City of Chula Vista	The first sentence of the last paragraph refers to two different tables about sediment size.	Added "and" to denote two different tables
135	10-125	City of Chula Vista	Table 10-38 – DW action levels should be re-looked at for conductivity, turbidity, diazinon, and chlorpyrifos. It should be made clear in the text if these ALs are for ambient conditions or if they are	GLOBAL-These action levels apply to the Dry Weather Monitoring Workgroup Action Levels established by the Copermittees. Chlorpyrifos and Diazinon action levels were evaluated at 0.5 ug/L,

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#	Section-Page #	Copermittee	Comment	Response to Comment
			DWM ALs established by the Copermittees.	but were inadvertently rounded during the formatting of the report. The tables were revised.
136	10-126	City of Chula Vista	Table 10-39 is not discussed in the text. It is not clear what an "Average of Action Ratio" is so this should be explained.	Text added as recommended.
137	10-128	City of Chula Vista	Table 10-40 has columns for numbers of sites and numbers of samples. Since this is trash monitoring and there are no real "samples," should it be listed as number of assessments instead?	The column header "samples" was changed to Number of Assessments as recommended.
138	10-133	City of Chula Vista	Table 10-41 What is the justification for highlighting results when the WQOs are used for reference only?	Highlighting has been removed.
139	10-136	City of Chula Vista	In the first paragraph of the sentence, clarify that Basin Plan WQOs are used for reference only.	Text added
140	10-137	City of Chula Vista	Table 10-43 What is the justification for highlighting these results when the WQOs are used for reference only?	Highlighting has been removed.
141	10-143	City of Chula Vista	Figure 10-38 As mentioned in the text, there should be an explanation that these loads are not representative of all dry weather MS4 runoff in Sweetwater.	Footnote was added to Sweetwater map stating that loads are not representative of all MS4 dry weather runoff.
142	10-150	City of Chula Vista	Table 10-47 shows a BA score of Very Poor for both sites in 08-09, however, Table 10-27 shows a rating of Good for the upper Sweetwater Site.	The ambient tables were revised per other comments from the Copermittee Workgroup. SMC results were added to this table. The one good IBI score occurs in the upper watershed in open space and at a considerably higher elevation than the more common urban sites monitored under the permit and are more reflective of reference conditions.
143	10-150	City of Chula Vista	Please verify if it is statistically valid to make diamond ratings based on one year of ambient monitoring. Perhaps call the diamond rating a "Potential" Frequency of Occurrence.	The diamond rating from this part of the report has been removed from the text.
144	10-152	City of Chula Vista	It is not clear if the diamond ratings can be applied to MS4 data since they have been exclusively used to evaluate receiving water MLS monitoring results.	The diamond rating from this part of the report has been removed from the text.
145	10-167	City of Chula Vista	In Section 10.5.4.1.3 refers to the Otay TWAS, but the location is not clear. Show the location of the Otay TWAS on Figure 10-39	Otay TWAS is not monitored in this report's permit year. Reference in text has been deleted.
146	10-173	City of Chula Vista	Table 10-58 – DW action levels should be re-looked at for conductivity, turbidity, diazinon, and	The DW AL are those provided by the copermittees and are specified in the footnotes.

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#	Section-Page #	Copermittee	Comment	Response to Comment
			chlorpyrifos. It should be made clear in the text if these ALs are for ambient conditions or if they are DWM ALs established by the Copermittees.	
147	10-176	City of Chula Vista	Table 10-60 - has columns for numbers of sites and numbers of samples. Since this is trash monitoring and there are no real "samples," should it be listed as number of assessments instead?	Table has been changed as recommended.
148	10-181	City of Chula Vista	Section 10.5.4.2.3 refers to the Sweetwater Section for MS4 Outfall random wet data. Seems like Otay data should be discussed in the Otay section.	Due to the limited data set available all data were compiled and discussed in the Sweetwater section
149	10-212	City of Chula Vista	There is no discussion of MS4 Outfall monitoring data in Otay.	Insufficient data were available for each subwatershed so it was combined into the Sweetwater section
150	12-11	City of Chula Vista	Not sure if it is reasonable to conclude that MS4 dry weather runoff may have potential to contribute to receiving water problems this early in the program.	This language was agreed upon by the Copermittees as it relates to the potential for the MS effluent to affect receiving water quality.
151	12-12 to12-13	City of Chula Vista	Tables 12-10 through 12-12 should be revised so they are not called exceedences. Perhaps should be called "comparisons" or "summary."	Tables changed as requested.
152	12-15	City of Chula Vista	There is not a conclusion section in the MS4 section like there is in the Source ID section.	A conclusion is provided in the Conclusions and Recommendations Section.
153	Section 8, entire section	City of San Diego	Please refer to the Mission Bay WMA as "Mission Bay and La Jolla WMA" throughout the entire report.	Corrected throughout chapter. Also corrected in Introduction and Conclusions sections.
154	Section 8, ES-2	City of San Diego	Table ES.8-2 – TMDL Status column. Wasn't the Indicator Bacteria TMDL for the beaches and creeks, including the Mission Bay Shoreline, referred back to the Regional Board, and is not adopted?	Corrected text in Table/Text. Mission Bay Shoreline is included in Project 1-Beaches and Creeks TMDL.
155	Section 8, ES-2	City of San Diego	1st paragraph: "...with the exception of Chollas Creek that is monitored each year." Change that to which.	Change was made as requested.
156	Section 8 ES-1	City of San Diego	The Mission Bay WMA is the smallest WMA lying entirely within San Diego City at 43,221 acres. Substitute "City" for County.	Change was made in another comment.
157	General Comment (whole document)	City of San Diego	Substitute "receiving water quality standard" (or equivalent) for "benchmark". Applicable to whole document.	The term receiving water quality benchmark was applied throughout the document.

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158	Section 8 ES-7	City of San Diego	<p>“A dry weather source identification study of single family residences was conducted by the Copermittees during the 2008-2009 Monitoring Season. Results indicated that synthetic pyrethroids were commonly detected in direct runoff in environmentally relevant concentrations.”</p> <p>Direct runoff from where?</p>	Sentence revised to indicate runoff from residential areas. Sentence was also revised per comment#7.
159	Section 8 ES-8	City of San Diego	<p>“In addition, it is recommended to address the potential role of urban runoff in causing physical habitat disturbance.”</p> <p>Is “physical habitat disturbance” based on the bioassessment?</p>	The recommendation is from the triad assessments table in the Permit. Physical habitat is not based on bioassessment. An example of physical habitat disturbances from urban runoff would be hydromodification, temperature, or settling of fines that cover the natural substrate, but would not be chemically mediated effects.
160	Section 8 8-12	City of San Diego	Difficult to tell difference between “jurisdictional dry weather” and “MS4 Random Wet” icons on map. Change color to better differentiate between them.	MS4 Random Wet symbol color was changed to provide better differentiation.
161	Section 8 8-12	City of San Diego	Delete “Order No. 2007-001” from CSDM Sites label.	Order No. 2007-001 was included for historical reference.
162	Section 8 8-14	City of San Diego	<p>“Conductivity, which is a measure of the dissolved solutes in the water, was relatively high at both sites, ranging from 2,510 µmhos/cm in the northern reaches of the WMA to 4,421 µmhos/cm in further south in the Tecolote HA (Site SMC-01046).”</p> <p>Delete “in”, sentence is awkward .</p>	Change was made as requested.
163	Section 8 8-15	City of San Diego	Move “Total Metals” line to next page.	Corrected.
164	Section 8 8-47	City of San Diego	<p>The purpose of the MS4 Outfall Monitoring Program is to characterize pollutant discharges from MS4 outfalls in each WMA during wet weather and dry weather, as required by Section II.B.1 of the Permit.</p> <p>Add “the”.</p>	Text changed as requested
165	Section 8 8-48	City of San Diego	Add “Trash Assessment” to bulleted list of data collected as part of the Dry Weather Program.	Bullet added as requested.
166	Section 8 Table 8-19	City of San Diego	Add MBAS (detergents) to the field screening analyte for 2008.	MBAS results were added to table 8-19.

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167	Section 8 Table 8-20	City of San Diego	Add MBAS to the exceedance matrix	MBAS results were added to table 8-20.
168	Section 8 8-52	City of San Diego	<p>“This is likely a function of the Jurisdictional DWM Program’s intent to target ICIDs. Because there are fewer urban land uses in this northeastern portion of the watershed, it appears that the number of dry weather sites is sufficient to meet the intended goals of the DWM Program.”</p> <p>This is due to the fact that this area is part of MCAS Miramar.</p>	Text added as requested.
169	Section 8 8-52	City of San Diego	<p>“For future MS4 outfall monitoring and source identification monitoring, additional samples in the Miramar HA may prove useful to identify drainage areas and sources contributing to higher TSS and turbidity in the watershed.”</p> <p>New paragraph. This implies that the City would have access to MCAS Miramar.</p>	Text added as requested.
170	Whole Document	City of San Diego	Use “receiving water quality benchmarks” when referring to benchmarks for the MS4 program.	For the purpose of this document, water quality benchmarks imply receiving water quality benchmarks. This was clarified in the in the methods section.
171	Section 8 Table 8-22	City of San Diego	Use “Receiving Water Quality Benchmarks” in the title.	For the purpose of this document, water quality benchmarks imply receiving water quality benchmarks. This was clarified in the in the methods section.
172	Whole Document	City of San Diego	When discussing the MS4 Outfall Monitoring Program use “normalized concentration” or equivalent instead of “instantaneous load”.	Instantaneous load is the correct terminology. The text states that “Instantaneous loads represent the load for a given pollutant at the time of data collection. Given the intermittent nature of dry weather flows in this region, instantaneous loads should not be extrapolated to longer time periods, such as day or year.”
173	Section 8 Table 8-23	City of San Diego	use “normalized concentration” or equivalent instead of “instantaneous load”.	See Comment 172.
174	Section 8 Table 8-24	City of San Diego	Use “Receiving Water Quality Benchmarks” in the title.	For the purpose of this document, water quality benchmarks imply receiving water quality benchmarks. This was clarified in the in the methods

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				section.
175	Section 8 Table 8-25	City of San Diego	Use "Receiving Water Quality Benchmarks" in the title.	For the purpose of this document, water quality benchmarks imply receiving water quality benchmarks. This was clarified in the in the methods section.
176	Section 8 Table 8-26	City of San Diego	use "normalized concentration" or equivalent instead of "load".	See Comment 172.
177	Section 8 8-91	City of San Diego	"..however, the results should not yet be considered representative of dry.." Delete "yet".	Change was made as requested.
178	Executive Summary ES-2	City of San Diego	"Ambient weather water quality samples were collected a grab samples in accordance with the SMC Regional Monitoring Workplan." Substitute "a" for "as"	Sentence was revised to read "...as grab samples..."
greb179	Executive Summary Assessment Findings Tables.	City of San Diego	Use "DWM" instead of "Jurisdictional" when referring to the dry weather program.	The term Jurisdictional Dry Weather was preferred as DWM was misinterpreted as dry weather ambient monitoring and was not specific to the particular monitoring program.
180	Executive Summary Assessment Findings Tables.	City of San Diego	In the "Ambient Urban Runoff Areas Assessment Constituents of Concern" some of the HAs have the program that the COCs came from and some don't. Make the notation consistent throughout all the tables.	Differences in watershed management areas (e.g. those with more than one HA or HU) resulted in different formatting. However, the program is still reported with each section.
181	Executive Summary Ambient Urban Runoff Areas Assessment ES-18	City of San Diego	"...The dry weather MS4 monitoring results suggest that the MS4 effluent may have the potential to contribute to..." Clarify whether this is referring to the "ambient MS4" monitoring or the Dry Weather program.	The statement refers to the dry weather MS4 monitoring. We refer to the dry weather program as Jurisdictional monitoring.
182	Executive Summary Table ES-5	City of San Diego	No footnote number.	A footnote number was added.
183	Executive Summary ES-19	City of San Diego	"Based on ambient weather conditions, conducting TIE to identify contaminants of concern and addressing upstream sources as a high priority is	The recommendation is based on the triad assessment table and may be warranted if toxicity patterns or chemical signatures change in future

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			<p>recommended. However, as mentioned above, the level of toxicity observed has not been sufficient to warrant a TIE at this time.”</p> <p>If toxicity is not sufficient to warrant a TIE why is it recommended?</p>	<p>monitoring years.</p>
184	Executive Summary ES-28	City of San Diego	<p>“Based on wet weather conditions, conducting TIEs to identify COCs, based on the TIE metric is recommended. However, Diazinon was previously identified as a causative agent and is still detected above the level expected to cause toxicity. Pyrethroids are also a likely source of toxicity to H. azteca based on TIEs conducted in other watersheds and observed chemistry results.”</p> <p>If Diazinon and Pyrethroids have been detected at levels sufficient to cause toxicity are TIEs still recommended?</p>	<p>TIEs are not recommended for this specific watershed at this time. However, the recommendation is based on the triad assessment table and may be warranted if toxicity patterns or chemical signatures change in future monitoring years. (See comment #183 above).</p>
185	Executive Summary Table ES-14	City of San Diego	<p>MBAS count wrong. Does not include dry weather field screening results.</p>	<p>Table ES-14 was updated.</p>
186	Executive Summary Table ES-17	City of San Diego	<p>Bioassessment column needs consistent formatting there is an extra line in some entries.</p>	<p>Formatting was adjusted as recommended.</p>
187	Executive Summary Table ES-17	City of San Diego	<p>Los Penasquitos Ambient Weather Action: “Conduct TIE to identify contaminants of concern, based on TIE metric. (Note: during the 2007-2008 Monitoring Season, TIEs were not warranted due to low levels of toxicity observed for C. dubia).”</p> <p>This is contradictory, are TIEs recommended or not?</p>	<p>See response to comment #183. The TIEs would be recommended if the level of toxicity was sufficient to produce statistically different results between treatments. Persistent toxicity was evident but at low levels and may be due to ionic imbalances in the water. Specialized toxicity studies beyond TIEs would be recommended (e.g. in-situ toxicity tests).</p>
188	Executive Summary Table ES-17	City of San Diego	<p>Chollas Creek Wet Weather Action: “Conduct TIE to identify contaminants of concern, based on TIE metric. (However, Pyrethroids are the likely source of toxicity based on chemistry results and recent TIEs).*”</p> <p>Change to “Conduct TIE to identify contaminant of concern once chemistry results show a change in</p>	<p>Table modified as recommended.</p>

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			conditions in terms of Pyrethroids.”	
189	Executive Summary Table ES-17	City of San Diego	<p>Tijuana River Wet Weather Action: “Conduct TIE to identify contaminants of concern, based on TIE metric. (However, Pyrethroids and Diazinon are the likely source of toxicity based on chemistry results and recent TIEs).*”</p> <p>We should not recommend conducting TIEs with known sources of toxicity. Once conditions change and toxicity is still present then conducting TIEs would be appropriate.</p>	Table modified as recommended. See Comment #188.
190	Section 11 Table ES 11-3	City of San Diego	<p>“Ambient Urban Runoff Areas Assessment (Jurisdictional, MS4, CSDM)”</p> <p>Substitute “DWM” for “Jurisdictional”.</p>	The term Jurisdictional Dry Weather was preferred as DWM was misinterpreted as dry weather ambient monitoring and was not specific to the particular monitoring program.
191	Section 11 ES-7	City of San Diego	<p>“The trash assessment conducted in 2008–2009 as part of the Jurisdictional DWM Program was used to identify possible sources of trash in the Tijuana River WMA.”</p> <p>Insert “possible” as underlined.</p>	Change was made as requested.
192	Section 11 11-1	City of San Diego	<p>“Ambient Bay and Lagoon Monitoring (ABLM) was not conducted as a separate Copermittee program.”</p> <p>This program is not relevant to this WMA, delete reference.</p>	Text was deleted.
193	Section 11 11-1	City of San Diego	<p>“The Source Identification Program was implemented in 2008–2009. Two sites were assessed, including one in the City of La Mesa in the San Diego Bay WMA and one in the City of Del Mar in the Los Peñasquitos WMA.”</p> <p>This program is not relevant to this WMA, delete reference.</p>	Although the study was not conducted in the Tijuana River WMA. The results provide a range of residential land use dry weather runoff results that may be applicable for watershed assessments in San Diego County urban areas. It also provide the reader a reference point to the study.
194	Section 11 11-2	City of San Diego	<p>“The Copermittees participated in the Stormwater Monitoring Coalition (SMC) Bioassessment Workgroup and the Southern California Regional Watershed Monitoring Program. Ambient water quality monitoring and rapid stream bioassessments were conducted at 16 randomly selected sites</p>	Text was revised to indicate there were no SMC sites sampled by the Copermittees in the Tijuana River WMA. However, it should be noted that one SMC site was sampled by the Regional Board in what appears to be Cottonwood Creek.

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			throughout the region, which included some WMAs, but not all. “ If this program was not conducted within this WMA we should not discuss it, or just say the “there were no SMC sample sites”.	
195	Section 11 11-10	City of San Diego	<ul style="list-style-type: none"> ▪ Regional dry weather source identification monitoring (Regional Dry Weather Source Identification Program). ▪ Coastal storm drain monitoring (CSDM) (CSDM Program). <p>These two programs don't appear to have been conducted within this WMA. If not reference to them should be deleted.</p>	<p>CSDM program has been deleted</p> <p>Regional Dry weather text was revised as this provides information on residential land uses that are applicable to all watersheds.</p>
196	Section 11 11-12	City of San Diego	<p>“The program uses the three major components of the assessment triad to evaluate the receiving waters, including water quality, toxicity, and rapid stream bioassessment. The water quality and toxicity results were evaluated by comparison to benchmarks and magnitudes of exceedance. The rapid stream bioassessment uses four major components: macroinvertebrate community structure, attached algae (i.e., periphyton) community metrics, physical habitat, and riparian condition. Data tables of chemistry, bacteria, and toxicity results are presented in Appendix D. “</p> <p>This appears to describe a program that was not performed in this WMA. If so this description should be deleted.</p>	Change was made as requested.
197	Section 11 11-25	City of San Diego	<p>“Water and sediment collection in the Tijuana River Estuary was performed on July 16, 2008.”</p> <p>Insert underlined “the”.</p>	Change was made as requested.
198	Section 11 11-31	City of San Diego	<p>“Based on the SQO Guidelines above, the results warranted that a targeted toxicity identification evaluation (TIE) be performed on the mussel larvae</p>	The naturally occurring ammonia was relevant only to those sites where ammonia was measured in elevated concentrations. It was applicable to the

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			<p>using sediment collected from Site 6009. The water quality data and reference toxicant tests conducted alongside the mussel larvae test provided evidence that ammonia, which naturally builds up in sediments, was the likely cause of toxicity at Site 6009. Ammonia can build up in sediments as a consequence of bacterial degradation of organic matter (i.e., ammonification) or through denitrification (i.e., nitrate reduction), which are both naturally-occurring processes in anaerobic (oxygen deficient) sediments. Elevated levels of ammonia are often found in sediment from lagoons and estuaries since these sediments are typically highly anaerobic and have a high level of organic matter. During the mussel larvae (<i>M. galloprovincialis</i>) toxicity test performed on sediment from Site 6009, ammonia was measured at levels (4.88 mg/L) that exceeded the no observed effect concentration (NOEC; 1.96 mg/L), as determined during a simultaneously performed ammonia reference toxicant test. These results indicate that ammonia was present at a concentration that likely contributed to the toxicity observed in sediment from this site.”</p> <p>This explanation should be included for all RHMP sites that naturally occurring ammonia was determined to be the causative agent of toxicity.</p>	<p><i>Mytilus galloprovincialis</i> tests in Batiquitos Lagoon, San Elijo Lagoon, San Diego River Estuary, and the Tijuana River Estuary where noted. Further study would be needed following the SQO guidelines to determine the cause of toxicity at RHMP sites.</p>
199	Section 11 11-40	City of San Diego	Reference to the Source ID program should be deleted. It was not performed within this WMA.	Although the study was not conducted in the Tijuana River WMA. The results provide a range of residential land use dry weather runoff results that may be applicable for watershed assessments in San Diego County urban areas. It also provides the reader a reference point to the study.
200	Section 11 Table 11-14	City of San Diego	Table missing MBAS results	MBAS results were added to table 11-14.
201	Section 11 Table 11-15	City of San Diego	Table missing MBAS results	MBAS results were added to table 11-15.
202	Section 11 11-47	City of San Diego	“Empirically, it has been observed that trash in the Tijuana River Valley is an issue of concern, and	Comment has been deleted.

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			<p>future trash assessments will be beneficial to addressing water quality issues in the Tijuana River WMA.”</p> <p>This appears to be in conflict with preceding paragraphs. Specifically: “Data collected to date suggest that trash of domestic origin (US) during dry weather is not a chronic concern to water quality in the Tijuana River WMA.”</p>	
203	Section 11 11-51	City of San Diego	<p>“Among the physical characteristics, pH was the only parameter found outside the benchmark...”</p> <p>Insert “the”.</p>	Change was made as requested.
204	Section 11 11-84	City of San Diego	<p>Based on wet weather conditions, conducting TIEs to identify COCs, based on the TIE metric is recommended. However, Diazinon was previously identified as a causative agent and is still detected above the level expected to cause toxicity.”</p> <p>These two sentences do not agree. If Diazinon levels are still high enough to cause toxicity are TIEs still recommended?</p>	Text adjusted to read: “In addition, Diazinon was previously identified as a causative agent and is still detected above the level expected to...”
205	Section 13 13-3	City of San Diego	<p>“It should be noted that the State of California is currently developing nutrient numeric endpoints for assessment of beneficial use impacts from nutrients and the current benchmarks for total nitrogen and total phosphorus may not necessarily indicate a biostimulatory response in the watershed.</p> <p>This comment should be included throughout document when Total N and Total P are discussed and a potential COC.</p>	This text has been deleted from the conclusions and recommendations section.
206	Section 13 13-3	City of San Diego	<p>“In recent years there has been an observed shift in pesticide usage from organophosphates to synthetic pyrethroids,”</p> <p>Insert underlined words for added clarity.</p>	This paragraph has been deleted.
207	Section 13 13-4	City of San Diego	and dissolved metal concentrations were compared to standards based on the hardness of the site water	Change was made as requested.

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#	Section-Page #	Copermittee	Comment	Response to Comment
			Insert "the CTR" before standards.	
208	Section 13 13-4	City of San Diego	"Of all the metals analyses performed, only one site, SMC-01990 (Mission San Diego), was found to be above benchmark standards." What metal was above and was it total or dissolved?	This paragraph has been deleted.
209	Section 13 13-5	City of San Diego	Of interest is that at each of the three sites that were above the TSS benchmark value Delete "at" before each, sentence does not read well	Change was made as requested.
210	Section 13 Table 13-3	City of San Diego	Number of dry weather samples should be consistent.	This table has been deleted.
211	Section 13 13-11	City of San Diego	When the Regional Monitoring Program implemented the analysis of organophosphate pesticides in 2001, it is was based on the threat of these pesticides entering the region's receiving waters Delete "is"	Change was made as requested.
212	Section 13 13-16	City of San Diego	Are conditions in receiving waters getting better or worse? Are conditions getting better or worse?	This text has been deleted
213	Section 13 13-18	City of San Diego	The MS4 Outfall Monitoring Program employs random and targeted monitoring of MS4 outfalls	This text has been deleted
214	Section 13 13-21	City of San Diego	"While several recommended actions are to conduct TIEs for persistent toxicity to <i>H. azteca</i> during wet weather conditions, the Copermittees have demonstrated that toxicity to this organism is most likely associated with the presence of the synthetic pyrethroid Bifenthrin in storm water runoff." The needs to be rewritten it seem contradictory.	This text has been deleted
215	Section 13 Table 13-8	City of San Diego	Action column Rewrite recommended actions where: "Conduct TIE to identify contaminants of concern, based on TIE metric. (However, pyrethroids are the likely source of toxicity based on chemistry results).*"	Text has been altered
216	Section 13 Table 13-8	City of San Diego	Los Penasquitos Creek Ambient Weather: Are TIEs recommended or not?	No changes were made. Text states "conduct TIEs" (See comment #183).

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#	Section-Page #	Copermittee	Comment	Response to Comment
217	Executive Summary Table ES-5 ES-18,19	City of San Diego	The title of the table is Los Peñasquitos Lagoon. In the table it is named; Los Peñasquitos WMA, and in the recommendations paragraph below it is referred to as the Los Peñasquitos Creek WMA. Not consistent.	Most text referring to Los Peñasquitos has been deleted for consistency. Only one reference remains with reference to Los Peñasquitos WMA.
218	Section 8 ES-47	City of San Diego	When the Regional Monitoring Program implemented the analysis of organophosphate pesticides in 2001, it is was based on the threat..... delete the "is"	Corrected.
219	Section 6 ES-6	City of San Diego	With the exception of oil & grease, pesticides, and dissolved metals, each of these constituents had concentrations greater than their respective benchmarks at a minimum one of the 14 sites assessed. Suggest adding "of "before the one.	Change was made as requested.
220	Section 6 ES-6	City of San Diego	Trash at one site assessed with a Submarginal ratings consisted primarily... Drop the "s"	Change was made as requested.
221	Section 6 6-5	City of San Diego	The San Diego RWQCB adopted a Basin Plan amendment on December 12, 2007, to incorporate the 19 indicator bacteria total maximum daily loads (TMDLs)..... Is the "19" correct?	The correct number is 19 (as of 2007). However, since the inclusion of Tecolote Creek into the TMDL, the number of listed segments is now 20 (as of 2009).
222	Section 6 6-12	City of San Diego	of beneficial uses? and 2) What is... Delete the "and"	Change was made as requested.
223		City of San Diego		
224	Section 6 6-29,30	City of San Diego	Would it be worth mentioning how the fires affect the IBI scores?	A brief note could be made that "excessive organic debris from burn areas can negatively impact BMI communities, but none of the sites sampled in 2009 showed evidence of this". Further speculation would not be appropriate here.
225	Section 6 6-34	City of San Diego	The following constituents were analyzed: specific conductance, turbidity, pH, reactive phosphorous, nitrate, ammonia, and surfactants (MBAS). Left out temperature.	Temperature is not included in the dry weather monitoring list of analytes.

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#	Section-Page #	Copermittee	Comment	Response to Comment
226	Section 6 Figure 6-13 6-36	City of San Diego	Can't find the MLS. It might be under one of the pie charts.	MLS is now shown above land use pie to be visible.
227	Section 6 Table 6-10 & 6-11 6-37,6-38	City of San Diego	Only have 2 samples for MBAS. Is that accurate?	Additional MBAS results were added to tables 6-10, 6-11, 6-37, and 6-38.
228	Section 6 6-54	City of San Diego	Question 3—What is the relative urban runoff contribution to the receiving water problem(s)?. Delete one of these “?”.	Change was made as requested.
229	Section 6 6-60 Table 6-16 6-60	City of San Diego	Error on date under SD-DW336 “05/0z4/2009”	The date was changed to 05/04/2009.
230	Section 6 6-82	City of San Diego	. Trash at one site assessed with a Submarginal ratings consisted primarily of food packaging, and trash at six sites consisted of household trash. Delete the “s” on ratings.	Change was made as requested.
231	Section 7 ES-5	City of San Diego	Concentrations of chloride and sulfate, which are constituents comprising TDS, were greater than the benchmark at all ambient sites monitored in the WMA. Add “of” before TDS.	Change was made as requested.
232	Section 7 7-13	City of San Diego	To address these questions, data were collected in the receiving waters... use “was”	Text left as is. “...data were...” is correct.
233	Section 7 7-47	City of San Diego	specific conductance, turbidity, pH, orthophosphate, nitrate, ammonia, and surfactants (Methylene Blue Active Substances (MBAS)). Analytical monitoring was conducted for at least 25% of the DWM stations where water was present. Temperature is omitted.	Temperature was not included in the table because temperature is not included in the dry weather monitoring list of analytes, page 12, Section B.3.c.(3) and (4) of the Receiving Waters and Urban Runoff Monitoring and Reporting Program. No. R9-2007-0001.
234	Section 7 Table 7-15 7-50	City of San Diego	No temperature data	Temperature was not included in the table because temperature is not included in the dry weather monitoring list of analytes, page 12, Section B.3.c.(3) and (4) of the Receiving Waters and Urban Runoff Monitoring and Reporting Program. No. R9-2007-0001.
235	Section 7 Table 7-15	City of San Diego	Only one MBAS sample taken in 2008?	MBAS samples have been added to table 7-15.

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#	Section-Page #	Copermittee	Comment	Response to Comment
	7-50			
236	Section 7 7-66	City of San Diego	Question 3—What is the relative urban runoff contribution to the receiving water problem(s)?. Delete one of these “?.”	Change was made as requested.
237	Section 7 7-89	City of San Diego	in 2008–2009 was more than four times than the benchmark, Delete the “than”	Change was made as requested.
238	SECTION 9 San Diego River WMA iii	City of San Diego	The Table numbers in the List of Tables do not match the Table numbers in the Executive Summary.	This has been corrected in the Final Draft.
239	ES.9 ES-1	City of San Diego	“..several changes are currently proposed in the 2008 Draft 303(d) List currently under development.” Should remove the first “currently” from this sentence.	Change was made as requested.
240	ES.9 ES-2	City of San Diego	The first paragraph for the “Summary of Monitoring Program Data to Address the Permit Core Management Questions” is unclear and should be expanded to discuss all the data used from the multiple monitoring programs.	Section is a summary and would be too descriptive for the WMA ES. The core management questions are more fully explained in the introduction (Section 1) and the scope of work (Section 2) of the report.
241	ES.9 ES-6	City of San Diego	“the benchmarks used in the assessment are applicable only to receiving waters and do not apply directly to runoff emanating from the MS4” should include discussion on why MS4 runoff may not impact receiving waters and has different benchmarks (diverted to sewer, flow does not reach RW) and recommend paired sampling to determine urban runoff contributions to RW problems.	Comment noted. The recommendation for paired sampling will be discussed in future monitoring workgroup meetings.
242	ES.9 ES-7	City of San Diego	“More detailed discussion of urban runoff sources can be found in each Copermittee’s Jurisdictional Urban Runoff Monitoring Program Annual Report and in the CSDM Program Annual Report (Appendix N).” Appendix N is empty.	CSDM annual report is included in Appendix N.
243	9.0 9-1	City of San Diego	“An overview of the WMA, regulatory water quality challenges, and the monitoring site descriptions used to assess the WMA.” The monitoring site descriptions are missing.	Monitoring site descriptions are provided in Section 9.3.1 and Section 9.3.2
244	9.0 9-1	City of San Diego	“Ambient Bay and Lagoon Monitoring (ABLM) was not conducted as a separate Copermittee program.” This is unclear and should be removed or explained.	Text changed to: “Ambient Bay and Lagoon Monitoring (ABLM) was not conducted as a separate Copermittee program

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#	Section-Page #	Copermittee	Comment	Response to Comment
			(not required due to participation in Bight '08?)	due to participation in the Bight '08 program."
245	9.0 9-1	City of San Diego	"The Source Identification Program...." This information is not relevant for this WMA and should be removed from this section.	Text deleted
246	9.0 9-1	City of San Diego	"Ambient water quality monitoring and rapid stream bioassessments were conducted at 16 randomly selected sites throughout the region, which included some WMAs, but not all." Should include information on how many sites were located in this WMA if any.	Text added – "three sites were located within the San Diego River WMA under each of these programs"
247	9.1 9-2	City of San Diego	Suggest the sentence be updated to read "the Receiving Waters and Urban Runoff Monitoring program can provide needed data to support additional studies (e.g., bacterial source tracking studies) designed to answer specific questions."	Text modified as requested.
248	9.2 9-3	City of San Diego	Figure 9-1 of the WMA would be clearer if each HA was in a different color.	For consistency, standard HA and HSA boundary symbology is used throughout all of maps. Applying different colors to each HA is not feasible in most maps due to color differentiation needed for different map themes.
249	9.2.1 9-3	City of San Diego	"Land use data tables and pie charts by HSA are presented for each WMA in Appendix C." The information in Appendix C-7 is for the HAs not HSAs and is already presented in Figure 9-2. All of the charts should include the land use key and have a title with the HA name and number. The zero percentages could be removed from the charts.	<p>A. Note was added to all land use maps stating that land use percentages are given in Appendix C.</p> <p>B. Excel charts in Appendix C now show HA name and number as title. Percentages now reported to one significant figure so that charts no longer show 0%.</p>
250	9.2.3 9-4	City of San Diego	Suggest the sentence be updated to read "Notable water bodies of the watershed are shown in Figure 9-1 and include..."	Change was made as requested.
251	9.2.4 9-5	City of San Diego	"Potential impacts to the watershed include surface water quality degradation, habitat degradation and loss, sediment, invasive species, eutrophication, and flooding (San Diego County, 2006)." Should clarify invasive species impact (presence, increase, introduction, etc.) and change sediment to sedimentation.	Change was made as requested.
252	9.2.4 9-5	City of San Diego	"(San Diego County, 2006)" is referenced twice in the first paragraph but it is unclear in the reference	The citation has been added to the reference section (Section 14). It is a link to the project cleanwater

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#	Section-Page #	Copermittee	Comment	Response to Comment
			section where this information was cited from.	website and has been updated in the text as San Diego County, 2009.
253	9.2.4 9-8	City of San Diego	Figure 9-2 should include the percentages on the pie charts for the primary land uses.	Shown in Appendix C. Addition of this information to maps makes them too busy.
254	9.2.4 9-9	City of San Diego	Figure 9-3 the key should only include the jurisdictions shown in the WMA.	No change made. Would require customizing the municipality boundary symbology for each WMA. We have chosen to use a standard key among all maps.
255		City of San Diego		
256	9.3 9-12	City of San Diego	Figure 9-5 could be zoomed in to better show the sample sites.	Map was zoomed in for better resolution of site locations. Inset provided with entire WMA shown.
257	9.3.1 9-13	City of San Diego	"Data tables of chemistry, bacteria, and toxicity results are presented in Appendix D." Could not locate the SMC Program data in the Appendix.	The sentence was removed from the main text because the SMC data are provided in the document, and not in the appendix.
258	9.3.1 9-13	City of San Diego	Sentence should be updated to read: "A trend assessment was conducted for all wet weather data that have been collected at the San Diego River MLS, including the 2008–2009 data set."	Included the word "all"
259	9.3.1 9-13	City of San Diego	"Data tables for these programs are presented in Appendix D." The data for the San Diego River MLS is missing and has the San Dieguito MLS data instead.	The table was corrected.
260	9.3.1.3 9-20	City of San Diego	"Collector taxa accounted for 99% of the community" Should include a brief definition or explanation of what collector taxa are and the significance.	Collectors feed on fine particulate organic detritus, algae, and various micro-organisms (Pennak, 2001; Usinger, 1956) and generally increase in response to high levels of urbanization and runoff (SLSI, 2003).
261	9.3.1.3 9-21	City of San Diego	Table 9-4. The title should be changed to San Diego River instead of Carlsbad and the units included for the elevation (feet?).	Elevation units added (feet). Title changed to San Diego River
262	9.3.1.4 9-24	City of San Diego	"TDS concentration during the storm event was 1,800 mg/L, which was greater than the benchmark value of 1,000 MPN/100 mL" Should change the MPN/100mL to mg/L to be consistent.	Units corrected
263	9.3.1.4 9-27	City of San Diego	"Malathion was detected during the November 14, 2008 storm event" Correct the date to November 4.	Change was made as requested.
264	9.3.1.8 9-36	City of San Diego	"Sediment with a high percentage of fines" fines should be changed to fine-grained materials	Change was made as requested.

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#	Section-Page #	Copermittee	Comment	Response to Comment
265	9.3.1.8 9-36	City of San Diego	Sentence should be updated to read: "Total coliform and fecal coliform concentrations ranged from 2 to 170 MPN/100 mL which is below the criteria identified in the Basin Plan."	Change was made as requested.
266	9.3.1.8 9-38	City of San Diego	Table 9-12 should include the units (make it clear that the numbers in the table are percentages).	Units were added to Table 9-12.
267	9.3.1.8 9-39	City of San Diego	"A detailed description of the methods used to evaluate sediment using SQO guidelines is provided in Appendix E." Unable to locate this data in Appendix E.	The text was updated to indicate that methods for SQOs are provided in Appendix B with all other methods.
268	9.3.1.8 9-42	City of San Diego	"These two analytes were analyzed in water column samples to assess these regionally problematic constituents." This sentence is unclear as to which two analytes and the results from the water column samples should be discussed.	Text adjusted to: "Fecal indicator bacteria and TSS were analyzed in water column samples to assess these regionally problematic constituents." This text refers to discussion regarding water column results.
269	9.3.1.9 9-43	City of San Diego	"Water quality monitoring was conducted in the San Diego River (SDR) by both the City of San Diego—with additional monitoring provided by the City of Santee, the City of El Cajon and the County of San Diego—and the County of San Diego." County of San Diego is listed twice in this sentence.	Change was made as requested.
270	9.3.1.9 9-44	City of San Diego	"..within the Lower SDR HA (907.12)" This number should be corrected to 907.10	Change was made as requested.
271	9.3.1.9 9-52	City of San Diego	"Wet weather monitoring was undertaken by the County of San Diego at two locations, including Site SDR08 and Site SDR10. The results of this monitoring (Appendix L)" Unclear where this information is in Appendix L if it is in fact there.	San Diego County Data was added to the appendix.
272	9.3.1.9 9-55 (actually 57)	City of San Diego	"...results for pH were between the bracketed benchmark of 6.5 to 9.0 during the 2007–2008 Monitoring Season for each of the six locations." Should be corrected to the 2008-2009 Monitoring Season.	Change was made as requested.
273	9.3.2 9-56 (actually 58)	City of San Diego	This sentence should be updated to read: "The Jurisdictional DWM data from the 2008 DWM Season (May 1, 2008– September 30, 2008), and the MS4 outfall monitoring and CSDM data from the 2009 DWM Season (May 1, 2009–September 30, 2009) were the most recent data available."	Change was made as requested.

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#	Section-Page #	Copermittee	Comment	Response to Comment
274	9.3.2 9-56	City of San Diego	"...reported in the CSDM Annual Report (Appendix F)." Should be corrected to Appendix N.	Change was made as requested.
275	9.3.2.1 9-57	City of San Diego	"The complete data set is presented in Appendix D." The file labeled San Diego River has the San Dieguito River data.	The data are presented in Appendix M, and the text was updated to reflect this.
276	9.3.2 9-76 to 9-88	City of San Diego	The sections for 9.3.2 are not numbered correctly; 9.3.2.1, 9.3.2.2, and 9.3.2.3 are used twice.	Formatting has been corrected in the Final Draft.
277	9.3.2.1 9-78	City of San Diego	"Among the 25 sites assessed with flow, flow was greatest at Site CT-SDR20 and Site CT-SDR08 (Figure 9-23)." Cannot locate site CT-SDR20 on this figure.	Site can be found in HSA 907.23 on map (upper right hand corner).
278	9.3.2.1 9-81	City of San Diego	Table 9-24. The exceedances of the Benchmarks should be shown in red as they are in previous tables.	Bold and shading were removed from all MS4 random and targeted tables based on Copermittee Workgroup Comments.
279	9.3.2.1 9-85	City of San Diego	Table 9-25 should include a footnote to explain the use of E+05, etc.	A footnote was added to the tables to explain the scientific notation.
280	9.5.1 9-90	City of San Diego	Tables 9-27, 9-28, and 9-29 are unclear and should include a description of how the data is presented (total number of samples collected, % of samples that exceeded the benchmark, a source for Criterion No., etc.)	Diamond tables have been deleted as requested by Copermittees
281	9.5.1 9-93	City of San Diego	"TDS, chloride, total phosphorus, and enterococci were identified as having a high frequency..." This paragraph should include an opening sentence with the table and data set it refers to.	Table reference added
282	SECTION 10 San Diego Bay WMA ES-7	City of San Diego	"enterococci and Bifenthrin, This..." The comma should be replaced with a period.	Change was made as requested.
283	ES-10-8	City of San Diego	2. What is the extent and magnitude of the current or potential receiving water problems? The first paragraph is repeated under Pueblo San Diego Watershed.	The duplicate paragraph was deleted.
284	ES-10	City of San Diego	"...fresh water input)." The end parentheses should be removed.	Change was made as requested.
285	ES-12	City of San Diego	"...CSDM Program Annual Report (Appendix F)." Should be changed to Appendix N.	Change was made as requested.

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#	Section-Page #	Copermittee	Comment	Response to Comment
286	ES-13	City of San Diego	"...lower than in the preceding year.." Should remove extra period.	Change was made as requested.
287	ES-10-7 to ES-10-15	City of San Diego	The Otay HU is not addressed in any of the core management questions.	The Otay HU had no ambient or wet weather monitoring. Since the jurisdictional dry and MS4 assessments were removed from the assessment section, there was insufficient data for this HU to discuss beyond what was already in the data tables.
288	10.2.1 10-3	City of San Diego	"Land use data tables and pie charts by HSA are presented in Appendix C." All of the charts should include the percentages, land use key and have a title with the HA name and number.	<p>A. Note was added to all land use maps stating that land use percentages are given in Appendix C.</p> <p>B. B. Excel charts in Appendix C now show HA name and number as title. Percentages now reported to one significant figure so that charts no longer show 0%.</p>
289	10.2.3 10-4	City of San Diego	(San Diego County, 2006) Unclear in the reference section where this information was cited from.	Reference added
290	10.2.3 10-5	City of San Diego	Figure 10-1 would be clearer if the HAs were in different colors.	For consistency, standard HA and HSA boundary symbology is used throughout all maps. Applying different colors to each HA is not feasible in most maps due to color differentiation needed for different map themes.
291	10.2.3 10-6	City of San Diego	Figure 10-2 should include the percentages on the pie charts for the primary land uses.	Shown in Appendix C. Addition of this information to maps makes them too busy.
292	10.2.3 10-8	City of San Diego	Figure 10-4 should show the HAs in different colors and move the 303(d) listing info. to the side to keep the waterbodies visible.	For consistency, standard HA and HSA boundary symbology is used throughout all maps. Applying different colors to each HA is not feasible in most maps due to color differentiation needed for different map themes.
293	10.3.3 10-10	City of San Diego	"Impacts to the Pueblo San Diego HU water quality include surface water degradation, habitat degradation, sediment toxicity, natural sources, and sewer overflows." Unclear how natural sources impacts the HU.	Natural sources can impact bacteria concentrations in receiving waters.
294	10.3.3 10-12	City of San Diego	"...Implementation Plan The..." Need a period after Plan.	Change was made as requested.
295	10.3.4 10-12	City of San Diego	"Wet weather monitoring..." This paragraph should be broken up into separate bullets.	Change was made as requested.
296	10.3.4	City of San	Figure 10-5. The boundary for the Pueblo San Diego	HU boundaries are now symbolized (orange lines) on

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#	Section-Page #	Copermittee	Comment	Response to Comment
	10-13	Diego	HU is unclear and should be in a different color.	all SDB maps. Also, an HU name callout has been added to some maps.
297	10.3.4.1.3 10-14	City of San Diego	"...Bight '08 Monitoring Season.." Should remove one of these periods after this sentence.	Change was made as requested.
298	10.3.4.1.4 10-17	City of San Diego	"...value (Error! Reference source not found.).." Should remove one of these periods after this sentence.	Change was made as requested.
299	10.3.4.1.6 10-22	City of San Diego	"Other scatterplots, as well as a table of trend results, including the S-statistic values and critical values, can be found in Appendix H." Could not find an Appendix H.	Appendix H is included in the final report.
300	10.3.4.1.7 10-27 (actually 28)	City of San Diego	Sentence should be corrected to read "Sediment at the MLS site consisted of sand primarily (56.2%) (Error! Reference source not found.)".	Change was made as requested.
301	10.3.4.1.9 10-28 (actually 29)	City of San Diego	<ul style="list-style-type: none"> ▪ City of San Diego Design Storm Evaluation for Chollas Creek This bullet is listed twice.	Change was made as requested.
302	10.3.4.1.9 10-46 (actually 47)	City of San Diego	"Investigative sites were samples as flows were detected." Should be changed to sampled.	Change was made as requested.
303	10.3.4.2 10-50 (actually 51)	City of San Diego	"CSDM data were also analyzed separately and are reported in the CSDM Annual Report (Appendix F)." Should be changed to Appendix N.	Change was made as requested.
304	10.3.4.2.1 10-50	City of San Diego	"The following constituents were analyzed: specific conductance, turbidity, pH, reactive phosphorus, nitrate, ammonia, and surfactants (Methylene Blue Active Substances (MBAS))." Should add temperature.	Temperature was not included in the table because temperature is not included in the dry weather monitoring list of analytes, page 12, Section B.3.c.(3) and (4) of the Receiving Waters and Urban Runoff Monitoring and Reporting Program. No. R9-2007-0001.
305	10.3.4.2.1 10-51 (actually 52)	City of San Diego	The complete data set is presented in Appendix D. Should change to Appendix M.	This change was made in another comment.
306	10.3.4.2.1 10-52	City of San Diego	Figure 10-23 should have the Pueblo San Diego HU in a different color than gray to make it clearer.	HU boundaries are now symbolized (orange lines) on all SDB maps. Also, an HU name callout has been added to some maps.
307	10.3.4.2.1 10-53, 10-54	City of San Diego	Table 10-11 and Table 10-12 are missing the results for detergents (MBAS).	MBAS results have been added to table 10-11 and 10-12.

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#	Section-Page #	Copermittee	Comment	Response to Comment
308	10.3.4.2.1 10-56	City of San Diego	Table 10-13 should include the HSA names along with the numbers.	HSA names were not added to the table because HSA name is reflected in the table title (Otay River) and also represented by the sample ID (OTR).
309	10.3.4.2.1 10-58	City of San Diego	Figure 10-24 should have the Pueblo San Diego HU in a different color than gray to make it clearer and the poor and submarginal circles larger.	HU boundaries are now symbolized (orange lines) on all SDB maps. Also, an HU name callout has been added to some maps. Size of circles not changed as other copermittees may not agree with additional emphasis. Color and the addition of site labels adequately differentiate the submarginal and poor sites.
310	10.3.4.2.4 10-62 (actually 63)	City of San Diego	"...however, total phosphorus was not identified as a high frequency of occurrence COC in the ambient receiving water assessment (Subsection 10.3.6)." Should be changed to "was identified".	Change was made as requested.
311	10.3.5 10-70 (actually 71)	City of San Diego	"...daily mean flow rates for the 2008-2008 Monitoring Season." Should be changed to 2008-2009.	Change was made as requested.
312	10.3.6.4 10-83 (84)	City of San Diego	"In addition, Consideration..." consideration should be lowercase.	Change was made as requested.
313	10.3.7 10-83 (84)	City of San Diego	"...high frequency of occurrence COC.." Should remove a period from the end of this sentence.	Change was made as requested.
314	10.3.7.1 10-83	City of San Diego	"...Bifenthrin, This suggests..." Should have a period after Bifenthrin.	Change was made as requested.
315	10.3.7.1 10-86 (87)	City of San Diego	"...CSDM Program Annual Report (Appendix F)." Should be changed to Appendix N.	Change was made as requested.
316	10.3.7.1 10-87 (88)	City of San Diego	"...preceding year.." Should remove a period from the end of this sentence.	Change was made as requested.
317	10.5.4 10-166	City of San Diego	Figure 10-39. Eash HA should be shown in a different color for clarity.	For consistency, standard HA and HSA boundary symbology is used throughout all maps. Applying different colors to each HA is not feasible in most maps due to color differentiation needed for different map themes.
318	10.5.4.2.1 10-170	City of San Diego	"The following constituents were analyzed: specific conductance, turbidity, pH, reactive phosphorus, nitrate, ammonia, and surfactants (MBAS)." Should add temperature to this list.	Change was made as requested.
319	10.5.4.2.1 10-172	City of San Diego	Figure 10-40 should have the HAs in different colors for clarity.	For consistency, standard HA and HSA boundary symbology is used throughout all maps. Applying different colors to each HA is not feasible in most

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#	Section-Page #	Copermittee	Comment	Response to Comment
				maps due to color differentiation needed for different map themes.
320	10.7.1 10-209 (210)	City of San Diego	"...and 3rd Party data..." should be changed to third-party to be consistent.	Change was made as requested.
321	Section 6, Page ES-3	County of San Diego	Table ES.6-3 – add "San Dieguito River" in the title before "WMA".	Correction made.
322	Section 6, Page ES-3	County of San Diego	Table ES.6-3 – Suggestion: to add TWAS-2's "Fair" rating in the Rapid Stream Bioassessment row.	TWAS-2 Fair Rating was added as recommended.
323	Section 6, Page ES-3	County of San Diego	Table ES.6-3 – Copper should be removed from the Ambient Urban Runoff row due to comment #XX.	Ambient assessments were revised based on other comments received at the Regional Monitoring Workgroup.
324	Section 6, Page ES-6	County of San Diego	Last paragraph – was the dry weather source ID study for pyrethroids conducted in the San Dieguito River WMA – I do not see any information on this study in section 6. This paragraph should be deleted if it was not conducted in the San Dieguito River WMA.	Paragraph was revised as this was a regional program applicable to all watersheds with residential land uses.
325	Section 6, Page 6-3	County of San Diego	Last paragraph – San Dieguito Reservoir is not located in the San Dieguito River WMA – it is in the Carlsbad WMA.	Text has been deleted
326	Section 6, Page 6-13	County of San Diego	Last paragraph – "At Site SMC-00473, the total nitrogen concentration was caused by a combination of high nitrate concentrations and high TKN concentration." Please remove the "high" from in front of nitrate and replace "high" with "elevated" in front of TKN.	Change was made as requested.
327	Section 6, Page 6-14	County of San Diego	Table 6-3 – add a comma for the Chlorophyll-a row results on 6/3/2009 - ("2,162.7").	A comma was added for Chlorophyll-a result on 6/3/2009.
328	Section 6, Page 6-19	County of San Diego	Second and third paragraphs and site photo – Need to replace "San Dieguito Creek" with "San Dieguito River" – in four places.	Change was made as requested.
329	Section 6, Page 6-19	County of San Diego	Second and site photo – Need to replace "SMC 00473" with "SMC-00473" – in two places.	Change was made as requested.
330	Section 6, Page 6-20	County of San Diego	Table 6-4 need to replace "Carlsbad" with "San Dieguito River" in title.	The table title was corrected.
331	Section 6, Page 6-20	County of San Diego	Table 6-4 need to replace – Need to replace "SMC 00473" with "SMC-00473" – in one place.	Station name was updated in Table 6-4.
332	Section 6, Page 6-20	County of San Diego	Second paragraph refers to Site SMC 00729 – please check to make sure Table 6-4 is the correct data.	The station ID was corrected, assuming the commenter was referring to station SMC-00473.

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			Also correct reference to Site SMC 00729.	
333	Section 6, Page 6-35	County of San Diego	Third paragraph – “San Pasqual Ha” should be “San Pasqual HA”.	Change was made as requested.
334	Section 6, Pages 6-37 – 6-38	County of San Diego	General comment – Table6-10 “...Summary of the 2008 Dry Weather Monitoring Results” is not consistent with the Table 6-11 “... 2008-2009 Dry Weather Exceedance Matrix”. Should be either “2008” or “2008-2009”. The text in the Jurisdictional Dry Weather Monitoring Program HA section says “2008-2009” in several places. It should probably say “2008”, since all the DWM sampling was done in 2008.	Table caption corrected.
335	Section 6, Page 6-44	County of San Diego	All sites indicated on this page should start with “MS4D-“, (12+ locations).	Change was made as requested.
336	Section 6, Page 6-47	County of San Diego	All sites indicated on this page should start with “MS4D-“, (7+ locations).	Change was made as requested.
337	Section 6, Page 6-54	County of San Diego	Third paragraph states that “One site is located in the Ramona HSA (905.41).” - there were at least two sites as indicated on Figure 6-18 (map shows one dry and one wet).	Sentence deleted.
338	Section 6, Page 6-54	County of San Diego	Forth paragraph – check punctuation on “...problem(s)?.”	Change was made as requested.
339	Section 6, Page 6-55	County of San Diego	First paragraph – Page 6-54 indicates that there are only 18 sites monitored not 19 as shown in the second sentence.	Change was made as requested.
340	Section 6, Page 6-57	County of San Diego	First paragraph – check the order of flow for the last three sites – look like the wrong order.	Order was verified to be correct.
341	Section 6, Page 6-67	County of San Diego	Table 6-20 – the table seems to indicate that only three (1 out of 3 = 33%) dissolved copper sample were collect for the Dry Weather Monitoring season. That would be incorrect – please revisit the DWM data for dissolved copper. This would most likely remove dissolved copper as a COC in this table and also on Table 6-24 (page 6-75) and the text on page 6-70.	This table was deleted at the request of the Copermittees.
342	Section 6, Page 6-70	County of San Diego	Second paragraph - dissolved copper text (see comment #21 for information).	Associated text was deleted.
343	Section 6, Page 6-70	County of San Diego	Suggest moving Tables 6-20 and 6-21 to this page since the text about them is located here – it is a bit	Text left as is to be consistent with other sections.

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			confusing seeing the Table in the earlier pages.	
344	Section 6, Page 6-77	County of San Diego	Table 6-24 – Ambient section - dissolved copper text (see comment #21 for information).	Text for ambient section was modified since no assessment was conducted.
345	Section 6, Page 6-77	County of San Diego	Table 6-24 – Wet Weather section - Last paragraph under the Integrated WMA Assessment Summary states that “Synthetic pyrethroids have been detected at levels sufficient to induce a toxic response...”, but no mention of wet weather pyrethroids being detected was stated in the San Dieguito sections. Pages 6-16, 6-24, and Table 6-8 seem to indicate that no pyrethroids were detected in the water samples or the sediment samples. Please modify this text to or clarify accordingly.	Text modified as requested.
346	Section 6, Page 6-79	County of San Diego	Last paragraph – Pages 6-16, 6-24, and Table 6-8 indicate that no pyrethroids were detected in the water samples or the sediment samples in 2008-2009. Please add this fact in the text to or clarify text accordingly, only 2007-2008 results are mentioned.	Text added.
347	Section 6, Page 6-82	County of San Diego	Third paragraph – was the dry weather source ID study for pyrethroids conducted in the San Dieguito River WMA – I do not see any information on this study in section 6. This paragraph should be deleted if it was not conducted in the San Dieguito River WMA (same as comment # 4).	See response to comment 324.
348	12.1, 12-6-8	County of San Diego	Request Copermittees input on if to include Bight 08 lagoon studies, RHMP and SMC bioassessment results in this Pyrethroids section. Also, source ID results were not presented, although indicated that they would be included.	RHMP, Bight 08, and SMC sections not relevant to the pyrethroid monitoring workplan were removed following the Copermittee Monitoring Workgroup’s recommendation.
349	12.1,12-9	County of San Diego	The conclusions could be more specific- where are they being detected based on the 2 years of the program.- ? samples out of how many samples exceeded the benchmark, etc.; the current response is vague. Also the wording could be modified for sediment to better frame the good news. For example, Infrequent detection of Synthetic pyrethroids (? Out ? samples) were found in San Diego Bays and Estuareus....Of the X samples that exceeded an LC50, none exhibited toxicity to the E. estuarius.	Conclusions were modified to include where actual detections above the LC50 were noted over the 2 year period. The numbers of sample exceedances were added as recommended. Bight 08 Estuary monitoring result conclusions were left.

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			Also what is the evidence that sediments have the potential to induce sediment dwelling organisms? Is it because the LC50 is exceeded in 15 out of the ? samples collected during the two years of the program? If so, then please be specific.	Sediments have the potential to cause toxicity if above sediment LC50s. Language was revised from "induce" to "cause" and was specific only to those sites where the exceedances were noted. Additionally, language was added to discuss the recent findings from the SMC organics intercalibration study.
350	12.2, Tables 12-9-12-12	County of San Diego	Table 12-9-12; Please insert "MS4 Outfall in the Title; Table 12-10-12; Please footnote Total P and Total N as narrative objective per comment # 8. Please modify title to include "Water quality benchmarks used for comparative purposes to answer the question "Is urban runoff contributing to receiving water problems? " Need units for tables 12-10-12.	Units were added to Tables 12-10 through 12-12. Footnotes added as requested. Table titles were modified per other comment recommendations as "...Sampling Summary and Comparison to Receiving Water Benchmarks"
351	12.2.5, Figure 12-1	County of San Diego	Rename figure- perhaps" Examples of poor correlations between variables measured for the MS4 Outfall Monitoring Program. I would want the Copermittees to weigh in if this analysis should even be included as this is the first year that the program was fully implemented and there may not be enough data to conduct statistical evaluations.	Section 12.2.5 was removed based on this and other comments.
352	12.2.5, Table 12-14	County of San Diego	Please insert a footnote explaining what the tables means...for example, R-squared values range from 1 to -1. A value of 1 suggests a strong positive correlation, etc. I would want the Copermittees to weigh in if this analysis should even be included as this is the first year that the program was fully implemented and there may not be enough data to conduct statistical evaluations.	This analysis was removed from the report.
353	Figures 12-5 through 12-17	County of San Diego	Please change County of San Diego to San Diego Copermittees in all of the titles. Also, if concentrations are compared to benchmarks, please insert the question "Does the MS4 contribute to receiving waters problems?" and make it clear in a footnote that the benchmarks are used as comparisons to answer this question and the benchmarks do not apply to MS4s.	Figures revised and footnotes added as requested.

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354	Figure 12-6	County of San Diego	June 17, 2009, 0.07" precip on fig. 12-6 does not agree with the text- please review and revise as necessary. Did it rain in Del Mar on June 17th and if so- why was there no flow?	There was a small amount of rainfall recorded throughout the county on June 17th. The La Mesa sites showed responses, and therefore it was marked on the graphic in order to demonstrate that it wasn't a large dry weather discharge event. The Del Mar site did not show a response, but the indicator for the rainfall event was left of the graph for consistency. It is likely that the Del Mar site did not show a response because of the more pervious nature of the surrounding drainage. It would take more flow/rain to reach the Del Mar site than the La Mesa sites, which are all highly impervious.
355	12-25, 13-20	County of San Diego	Remove" via pipe seeps were likely. However, the groundwater source may be attributable to over-irrigation and an elevated water table due to low permeability soils occurring in this watershed" unless you have evidence of this. A review of Fig. 12-12 supports that the high TDS value for LM-SID-1 is likely due to it being discharged groundwater- not infiltrated irrigation water- as the TDS would not likely be so elevated (from 1,000 to 3,000), in such a short distance. Stable isotope studies may provide additional information. Alternatively, reviewing the chemistry of the water and comparing it with the local potable water supply may provide additional insights to the source of the groundwater. This may be a natural discharge area.	<p>The sentence "However, the groundwater source may be attributable to over-irrigation and an elevated water table due to the low permeability soils occurring in this watershed." Was removed as recommended.</p> <p>The high TDS is likely attributable to groundwater. Because there are no sources of groundwater at the top of the watershed in this specific area, the only likely source of water groundwater is from perched waters in the low permeability soils that are characteristic in Chollas Creek. The groundwater gradients would likely be influenced from over-irrigation, which was commonly observed in the area during site visits in some areas of the watershed. Also, the differences in potable water signatures between the upper sites, where overland runoff was observed, and the lower sites suggest shallow groundwater signatures.</p> <p>Pipe seeps were also observed during the confined space installations of the monitoring equipment in the lower site (LM-SID-1).</p>
356	12-32, 13-20	County of San Diego	Again, what are the conductivity or TDS values in these other areas of Chollas Creek watershed where this observation has been made? I am sure that this may be true in some areas, but I don't think the	The TDS at the lowest site (LM-SID-1) which was almost always flowing, were 3,730 mg/L, 4,014 mg/L, and 4044 mg/L, respectively. TDS at DM-SID-1, LM-SID-2, and LM-SID-3, where flows were

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			evidence is compelling in the La Mesa Source ID Study. Please let me know if I am missing something in this analysis.	only observed during times when overland flow was also visible, were 1,354 mg/L, 622 mg/L, 720 mg/L, and 704 mg/L, respectively.
357	12-39, 13-20	County of San Diego	Delete the last paragraph that begins with "The San Diego County Water Authority... this does not address question #3.	Paragraph deleted.
358	13.2.1, 13.2.2, 13.2.3, 13.2.4-6	County of San Diego	General Comment: this section does not discuss the watershed water quality conclusions, but provides a regional overview of the results. If the Copermittees want this section which is not required by the Permit, it should probably be moved to Section 12, Regional Summary. The Conclusions and Recommendations section should mirror those presented in the text for each watershed and should be consistent with the Executive Summary. Typically a new analysis of information is not presented in the conclusions and recommendations section. This will added to the agenda for the Dec 15th meeting. Sections 13.2.7 through 13.2.9 are appropriate as these are stand-alone programs in our Permit that require a regional analysis.	This comment was addressed by moving regional assessments to Section 12 based on comments received at the Dec. 15 th meeting.
359	13-20	County of San Diego	Please explain or delete "Synthetic pyrethroids were most commonly detected in the sediments in storm drains which drained residential areas, and specifically in the upper reaches of the drainage areas studied". If this conclusion is not specific to the Source ID studies conducted at Del Mar or La Mesa, please do not include.	Text was deleted based on previous comment/recommendation.
360	xlv	County of San Diego	"SQO "guidelines acronym should be added to the list "LOE" scores acronym should be added to the list	Change was made as requested.
361	ES-4	County of San Diego	Par. 5, sentence 1 " Toxicity to the reproduction...were observed on December 16, 2008, at the MLS" – this sentence implies that there was significant toxicity while there was not. Sentence should be changed to: " During 2008/2009 monitoring season, toxicity studies to the reproduction...were conducted on December 16, 2008, at the MLS"	Change was made as requested.

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362	ES-4	County of San Diego	Par. 8 "Core Management Question 2 was addressed...Bight '08 Program." - this sentence is misleading (no ambient monitoring was conducted in 2008/ 2009). The section actually discusses only the wet weather results plus historical bioassessment ratings and the lagoon spatial characterization study. The first paragraph should indicate that. Please, rewrite.	Language has been changed to reflect the wet weather results.
363	ES-5	County of San Diego	Par. 3. Please, delete the last sentence (sentence is repeated twice).	Change was made as requested.
364	ES-5	County of San Diego	Par. 5. Please delete paragraph 5. It repeats the information already stated in paragraph 4.	Change was made as requested.
365	ES-5	County of San Diego	Par. 7. Please rewrite the paragraph as follows: "Core Management Question 3 was partially addressed by the MS4 Monitoring Program. In 2008-2009, the Santa Margarita River MS4 was assessed though the random dry, random wet, and targeted dry weather surveys.	Text changed
366	ES-5	County of San Diego	Last Paragraph. "Ten sites were visited as part of the random dry program,..." Please, rewrite to: "Ten sites were visited as part of the random dry weather program,..."	Change was made as requested.
367	ES-6	County of San Diego	Par. 1, sentence 2. Please, remove the comma following the sentence.	Change was made as requested. (Please verify)
368	ES-6	County of San Diego	Par. 1, sentence 3. "The 2008-2009...due to the infancy of the program." Please, rewrite to "The 2008-2009 targeted MS4 monitoring data allow...; however, these results, representing only 1 year of data collection, should not yet be considered representative of all MS4 dry weather runoff."	Sentence revised as requested.
369	ES-6	County of San Diego	Par. 3, sentence 2. Please, delete second sentence (referring to the 16.7%)	Change was made as requested.
370	ES-6	County of San Diego	Par. 3, sentence 4 "Each of theses...Malathion." - Please rewrite to: "With the exception of nitrate, Chlorpyrifos, Diazinon, and Malathion, each of these constituents exceeded its respective benchmark concentration at at least one of the five sites assessed."	Change was made as requested.

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371	ES-6	County of San Diego	Par. 3, sentence 10 "More meaningful...years" Please delete the last part of the sentence: "of the MS4 Outfall Monitoring Program.."	Change was made as requested.
372	ES-7	County of San Diego	Par. 2, Sentence 2 "The Jurisdictional DWM ... sources." – Please rewrite to "The Jurisdictional DWM Program, the CSDM Program, and trash assessment in the receiving waters provide some information about urban runoff sources."	Change was made as requested.
373		County of San Diego		No comment made.
374	ES-7	County of San Diego	Par. 6 "Core Management Question 5....period at the site." - Please rewrite to "Core Management Question 5 was addressed through trend analysis of wet weather Santa Margarita River MLS constituent concentrations data collected through 2007–2008. Fecal coliform was the only constituent exhibiting a significant trend as its concentration decreased over the monitoring period."	Change was made as requested.
375	ES-7 (8)	County of San Diego	Last Paragraph, starting with the 2nd sentence " For the next full...HAS." – Please delete to the end of the paragraph.	Change was made as requested.
376	3-1	County of San Diego	Paragraph 12 "The MS4 Outfall Monitoring... jurisdictions." Please delete the last sentence.	Change was made as requested.
377	3-1	County of San Diego	Last Paragraph. Last sentence. "Ambient water quality monitoring and rapid stream bioassessments were conducted at 16 randomly selected sites throughout the region, which included some WMAs, but not all." – Please indicate whether SMR was included.	Text added: Santa Margarita River was not included in this program.

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378	Section 3.3.1; page 3-12	County of San Diego	Par. 3; Sentence 4 "A trend assessment...pyrethroids." Please rewrite to "A trend assessment was conducted for all Copermittee wet weather data collected since 2001 at the Santa Margarita River WMA, including the 2008–2009 data set. Samples of sediment were collected at the MLS following the storm event and were analyzed for synthetic pyrethroids."	Change was made as requested.
379	Section 3.3.1.2; page 3-12	County of San Diego	Par. 7; Sentence 4 "Sample results...program." Please, delete the last part of the sentence: "and are based on published values applicable to this monitoring program."	Change was made as requested.
380	Section 3.3.1.2; page 3-13	County of San Diego	Par. 1; Sentences 5 and 6 "The turbidity concentration during...2001." – Please rewrite to "The turbidity during the storm event was 855 NTU, which was greater than the benchmark value of 20 NTU. For both TSS and turbidity benchmark values were exceeded in five of the nine storm events monitored since 2001."	Change was made as requested.
381	Section 3.3.1.2; page 3-15	County of San Diego	Legend of Table 3-4. Please delete "* Indicates detection limit exceeds...benchmark." No "*" are actually used in this table.	The footnote was deleted from the legend of Table 3-4.
382	Section 3.3.1.2; page 3-15	County of San Diego	Last Paragraph, sentence 2. Please spell out "Ceriodaphinia" at the beginning of the sentence.	This name has been established and it is appropriate to refer to it in its abbreviated state after being established.
383	Section 3.3.1.3; page 3-17	County of San Diego	Par. 2, sentence 1. "The ratio of...problems?" Please rewrite the first part of the sentence as follows: "The ratios of a constituent concentrations during the storm event to their respective benchmark values were calculated to answer the magnitude portion of Core Management Question 2 ..."	Change was made as requested.
384	Section 3.3.1.3; page 3-17	County of San Diego	Par. 2, last sentence "These graphs...exceedance." Please rewrite to: "These graphs are useful in visualizing if and to what extent benchmark values were exceeded by the different COCs."	Text replaced as requested.
385	Section	County of San	Par. 2, last sentence "These graphs...exceedance."	Same comment as 384.

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	3.3.1.3; page 3-17	Diego	Please rewrite to: "These graphs are useful in visualizing if and to what extent benchmark values were exceeded by the different COCs."	
386	Section 3.3.1.3; page 3-17	County of San Diego	Par. 3, last three sentences "The TSS concentration was approximately 12 times greater... value for the site" - It would be useful to mention that the MLS station was moved and this may have contributed to the different results in 08-09.	Change was made as requested.
387	Section 3.3.1.4; page 3-19	County of San Diego	Par. 5, last sentence "The results presented... assessments." Please delete this sentence.	Change was made as requested.
388	Section 3.3.1.4; page 3-20	County of San Diego	Par. 2, sentence 2: "For trend analysis, this site was combined with a historic site located approximately 6 miles downstream on Camp Pendleton (SMR-CP) that has been sampled eight times between 2003 and 2007." - The results from these two sites should not have been combined for the purpose of trend analysis.	Results were separated and discussion was revised as recommended.
389	Section 3.3.1.4; Figs. 3-8, 3-9, 3-10 and 3-11	County of San Diego	Please move the legends so they do not "touch" the graphs.	Comment noted.
390	Section 3.3.2.2; Page 3-41	County of San Diego	Par. 5 Sentences 2 and 3 "The region was...time of the site visit." Please replace with: "The region was divided into nine strata delineated by WMA and a maximum of 12 sites were visited in each WMA. Each outfall without a dry weather flow was documented, and the next outfall on the randomized list was sampled. Best effort was made to sample at least six sites within each WMA."	Change was made as requested.
391	Section 3.3.2.2; Figure 3-16	County of San Diego	Figure 3-16 only shows 4 Random Dry Weather sites as indicated by the black pentagons. According to this, ten were "monitored" and 6 random dry weather sites were actually sampled. This should be properly illustrated in the figure.	A new symbol was created that is half green and half purple to identify locations that were monitored in both wet and dry events.
392	Section 3.3.2.5; Page 3-59	County of San Diego	Par. 2 "The Regional Dry Weather...WMA. - please add the following sentence as the second sentence in the paragraph: "It was not conducted in the Santa Margarita Watershed during 2008-2009. "	Change was made as requested.

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393	Section 3.5.5; Page 3-73	County of San Diego	Par. 2; last sentence "The only exception was the constituent group associated with Bifenthrin (organics), which was identified as a D water quality priority rating for the overall Santa Margarita River WMA, indicating a low priority." - According to table 3-28, Bifenthrin is not in organics group. It is a pesticide and it was rated B for the overall SMR WMA. Please, rewrite accordingly.	"(organics)" deleted
394	Section 3.6.2; Page 3-77	County of San Diego	Par. 7; Second sentence to the end of the paragraph "For the next full...HAS." – please, delete (only leave the first sentence)	Change was made as requested.
395	Section 5, Page ES-4	County of San Diego	First row "The Loma Alta HA (TDS and total nitrogen)" needs a space between "TDS" and "and".	Change was made as requested.
396				
397	Section 5, Pages 5-13-5-14	County of San Diego	Site name in Table 5-3 should be consistent with site name in Table 5-4, "LAC-TWAS-1".	Change was made as requested.
398	Section 5, All Jurisdictional Dry Weather Monitoring Program HA sections	County of San Diego	General comment – The same total number of visited, ponded, and dry sites for entire Carlsbad WMA is repeated in each Jurisdictional Dry Weather Monitoring Program HA sections and does not specifically call out the details of Dry Weather sampling in the individual HAs. It would be good to have the numbers (visited, ponded, and dry sites etc.) for each HA.	Table has been provided with this detail.
399	Section 5, All Jurisdictional Dry Weather Monitoring Program HA sections	County of San Diego	General comment – Each Jurisdictional Dry Weather Monitoring Program HA section - Table "...Summary of the 2008 Dry Weather Monitoring Results" (i.e. Table 5-5) is not consistent with the Table "... 2008-2009 Dry Weather Exceedance Matrix" (i.e. Table 5-6). Should be either "2008" or "2008-2009". The text in the Jurisdictional Dry Weather Monitoring Program HA section says "2008-2009" in several places. It should probably say "2008", since all the DWM sampling was done in 2008.	Text was modified to reflect that sampling was conducted in 2008.
400	Section 5, Page 5-38	County of San Diego	Table 5-16: Last paragraph under the Integrated WMA Assessment Summary states that "Synthetic	Reference to pyrethroids was removed.

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			pyrethroids were detected during those storm events ...”, but no mention of wet weather pyrethroids being detected was stated in the Loma Alta HA section. Page 5-13 also says that sediment samples of ten pyrethroids were below the detection levels.	
401	Section 5, Page 5-56	County of San Diego	Last paragraph – “... benchmark at eight of five of the six targeted dry weather sites.”, needs to be corrected with the proper number of sites.	Change was made as requested.
402	Section 5, Page 5-66	County of San Diego	Second paragraph - Loma Alta HA should be changed to Buena Vista Creek HA.	Change was made as requested.
403	Section 5, Page 5-67	County of San Diego	Table 5-30 should read “Buena Vista Creek” not “Buena Vista”.	Change was made as requested.
404	Section 5, Page 5-69	County of San Diego	Table 5-31: Last paragraph under the Integrated WMA Assessment Summary states that “Synthetic pyrethroids were detected at levels sufficient to induce a toxic response...”, but no mention of wet weather pyrethroids being detected was stated in the Buena Vista Creek HA section. Page 5-44 also says that sediment samples of ten pyrethroids were below the detection levels except Bifenthrin which was detected below the lab’s reporting limit.	Reference to pyrethroids was removed.
405	Section 5, Page 5-72	County of San Diego	First paragraph - Loma Alta HA should be changed to Buena Vista Creek HA.	Change was made as requested.
406	Section 5, Page 5-73	County of San Diego	Second paragraph - Loma Alta TWAS should be changed to Buena Vista Creek TWAS.	Change was made as requested.
407	Section 5, Page 5-95	County of San Diego	First paragraph – wrong font used.	Font was adjusted.
408	Section 5, Page 5-98	County of San Diego	Last paragraph –Is the number of sites visited correct? Forty-two (42) of 43 sites are stated as having water, but Table 5-43 indicated that probable only 29 had water present.	Corrected – 43 sites in total
409	Section 5, Page 5-117 (118)	County of San Diego	Double period at the end of the forth sentence of the third paragraph.	Change was made as requested.
410	Section 5, Page 5-125 (126)	County of San Diego	Second paragraph – “Auga Hedionda Ha” should be “Agua Hedionda HA”.	Change was made as requested.
411	Section 5, Page 5-125	County of San Diego	Forth paragraph – last sentence has a red colored period – change color to black.	Change was made as requested.

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412	Section 5, Page 5-130	County of San Diego	First paragraph – states there are five COCs, but eight COCs are listed.	Change was made as requested.
413	Section 5, Page 5-130	County of San Diego	Second paragraph – TDS is listed as having a high frequency of occurrence (3 diamonds) but table 5-56 shows TDS as having two diamonds. Which is correct?	Change was made as requested.
414	Section 5, Page 5-138	County of San Diego	Third paragraph – states that CT-CAR05 had the greatest loads in the Buena HA with the exception of nitrate/nitrite which was not analyzed at this site. This is not quite true. Table 5-49 shows values for both nitrate and nitrite at CT-CAR05. Nitrate/nitrite should be just a calculation of nitrate and nitrite individually.	Reference to nitrate/nitrite was removed.
415	Section 5, Page 5-160	County of San Diego	Second paragraph and site photo – site name should be “SMC-00729” not “SMC 00729”.	Change was made as requested.
416	Section 5, Page 5-161	County of San Diego	First paragraph – site name should be “SMC-00729” not “SMC 00729”.	Change was made as requested.
417	Section 5, Page 5-161	County of San Diego	Last sentence – state that “DWM” was not conducted –this is incorrect.	Change was made as requested.
418	Section 5, Page 5-177	County of San Diego	Second paragraph – states that “There were no jurisdictional dry weather sites in the upper HA...”, this is incorrect – there are at least one site and maybe another – the County of San Diego had at least one dry site in 904.53.	Map shows data while text is incorrect. Text will be changed to match data.
419	Section 5, Page 5-183 (184)	County of San Diego	Third paragraph – add “HA” after “San Marcos”.	Change was made as requested.
420	Section 5, Page 5-191	County of San Diego	Table 5-75 – last row – there is a red comment(?) triangle in the last cell; please remove.	The red comment triangle was removed from the table.
421	Section 5, Page 5-203	County of San Diego	Fourth paragraph – states “Malathion has never been detected at this site...”, but Figure 5-34 shows a small “Malathion blip” on the graphic.	Change was made as requested.
422	Section 5, Page 5-234	County of San Diego	Second paragraph – Site “CT-CBS-2” should be site “EN-CBS-2”.	Change was made as requested.
423	Section 5, Page 5-243 (244)	County of San Diego	First paragraph, second sentence – “20072008” should be “2007/2008”.	Change was made as requested.

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#	Section-Page #	Copermittee	Comment	Response to Comment
424	Section 5, Page 5-244	County of San Diego	Second paragraph – “San Marcos HA” should be changed to “Escondido Creek HA”.	Change was made as requested.
425	Section 5, Page 5-253	County of San Diego	Second paragraph under item number 4 – “...including two HSAs.”, should “say two of the three HSAs.”.	Change was made as requested.
426	Section 5, Page 5-254	County of San Diego	Please delete “Future MS4 Outfall and Source Identification Monitoring may be best focused in the areas of the upper reaches of the Escondido HSA and around Reidy Canyon Creek, and in the unassessed Lake Wohlford HSA.” The Copermittees stakeholder group developed the location for the MS4 outfall sample locations and the locations are set for this Permit cycle. The same group develops the Source ID pilot projects, which are identified for problem areas, not for areas that are unassessed.	Change was made as requested.
427	Section 5, Page 5-259	County of San Diego	Double period at the end of the past sentence of the first paragraph.	Change was made as requested.
428	ES-1	Port	Table ES 10-1 does not list CSDM conducted in Otay. In fact, there is one site present in Otay WShed: Coronado Tidelands Park.	Change was made as requested.
429	ES-3 & 10-11	Port	Tables ES 10-2 and 10-2 does not list the Shelter Island Yacht Basin TMDL	Shelter Island TMDL was added to the Executive summary but not to Table 10-2. Table 10-2 lists the 2006 303 (d) listed waters. The bullets below the table list the TMDLs and their respective adoption status and dates.
430	ES-5	Port	Table ES 10-3, under Third Party: state in what strata dissolved copper exceeds water quality benchmarks (marina)	Change was made as requested.
431	ES-10-7 to ES-10-13	Port	Suggest restructuring this section by HU so entire discussion of each HU is in one location: listing each of the 5 questions under each HU (i.e., Pueblo: 1-5, Sweetwater: 1-5, Otay: 1-5)	The decision was made to keep the original numbering system with the Hus imbedded in each question to be consistent with other Sections.
432	ES-10	Port	Rewrite 4th sentence in Pueblo section to read: “Six of the 12 MS4 outfall sites in the San Diego bay WMA monitored as part of the Random Dry Weather Monitoring Program in 2008-2009 were located within the Pueblo San Diego HU.”	Change was made as requested.
433	ES-10 & 10-160	Port	Text indicates that all SMC bioassessment sites within the SD Bay WMA received a Very Poor	Change was made as requested.

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			benthic community. This text contradicts table 10-27 which indicates a GOOD IBI rating at the upper SWR SMC site (00282) in 2008-09.	
434	ES-12	Port	Suggest remove last sentence in first paragraph	Change was made as requested.
435	10-12	Port	Suggest remove 4 th sentence of first paragraph and last sentence of 1st paragraph.	Change was made as requested.
436	10-12	Port	Suggest removing 2nd paragraph altogether, not necessary here	Change was made as requested.
437	10-15	Port	The first sentence states: "The remaining two storms are included in the TMDL section." Can a reference be made to the appropriate section (ie, 10.1.1.1)	Change was made as requested.
438	Section 10.3.4.1.6	Port	It is stated in the Receiving Water Trend Assessment Section that bacteria was evaluated. However, there was not a discussion or Scatterplot of the findings for bacteria in the Pueblo San Diego HU.	There were no significant trends therefore was not discussed. All scatterplots are in Appendix H.
439	10.28 (29)	Port	Under Third party Data, the City of San Diego Design Storm Evaluation for Chollas Creek bullet is listed twice.	Change was made as requested.
440	Section 10.3.4.1.9	Port	Regarding third party data collected for Pueblo San Diego, the following studies were conducted by the City of San Diego: -City of San Diego Aerial Deposition Phase III Monitoring -City of San Diego Dry Weather Bacteria Source Identification Study Perhaps these studies could be presented under the Urban Runoff Monitoring as Third Party Studies because they both address urban runoff contributions and sources of urban runoff and pollution rather than mainly receiving water quality.	These were added as third party data in the relevant WMA sections
441	10-54	Port	Were any of the exceedances for conductivity listed in Table 10-12 a result of tidal intrusion? If so, this should be indicated.	Laurel Street (5/8/08) and Pepper Park (5/8/08, 6/20/08) samples were noted as "tidal influence"; and the conductivity results were 12.7, 20, and 50 mS/cm respectively.
442	10-54	Port	The text below Table 10-12 indicates there were 25 exceedances of bacteria. Does this mean 25 sites had	Corrected.

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			exceedances for bacteria? This number contradicts what is portrayed in the table for bacteria exceedances. Clarification is needed.	
443	10-54	Port	Suggest we remove the bullets listing the categories of trash and refer to methodology section where more detailed info on the methodology of the trash assessment program should be. This also addresses same issue for Sweetwater and Otay.	Maintained for consistency with all sections this was discussed with Copermittees and it was determined it should remain for context.
444	10-61	Port	It may be appropriate in the first paragraph describing the nature of an instantaneous load, to include a sentence indicating that instantaneous loads per site can be compared year to year. Also, it may be appropriate to mention that the concentration of a pollutant may vary over the course of the time-period of flow?	Comment noted. Instantaneous loads should not be compared year to year due to the intermittent flow. Flow and concentration both vary over time, hence the use of instantaneous loads.
445	10-61	Port	The final paragraph on page 10-61 describes the number of targeted DWM sites sampled in the Pueblo San Diego HU. The numbers do not seem to summarize to the 24 sites monitored as indicated in the paragraph.	Corrected
446	10-63	Port	Paragraph 3 describes the Basin Plan Benchmark for enterococci as 151 mpn/100ml...if any of the sites were coastal sites, I believe the Basin Plan Benchmark is 104 mpn/100ml.	The benchmark of 151 MPN/100ml was used for the purposes of assessing outfall concentrations on a regional basis since the MS4 outfall samples are typically freshwater and are also infrequently used areas. The coastal outfall monitoring program addresses assessment of coastal areas and also applies the standards to saltwater criteria.
447	Section 10.3.4.2.2-10.3.4.2.4	Port	The comparison of MS4 Runoff to receiving water quality benchmarks may be inappropriate. Without clear benchmarks for MS4 runoff, perhaps a qualitative comparison of urban runoff to COC's and/or 303(d) listed waterbodies in the HU may be better.	This was discussed by the Copermittees and it was decided that the MS4 assessment would be removed but leave comparison to receiving water benchmarks with appropriate caveats.
448	10-75	Port	It may be inappropriate to develop frequency of occurrence ratings for urban runoff based on receiving water quality benchmarks as indicated in Table 10-19 (and later in Table 10-49).	Copermittees decided to remove the frequency of occurrence ratings for the MS4 and jurisdictional programs. These assessments have been removed.
449	10-77	Port	Indicate on bulleted list which constituents were high, med, or low. Or remove bulleted list altogether	Change was made as requested.

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450	10-83	Port	The final paragraph on page 10-83 which continues on to 10-84 was already stated in two paragraphs above.	Repetitive text deleted.
451	10-83	Port	Would be useful to know in what strata the RHMP sediment samples were taken and which were impacted, likely impacted etc. This comments also applies to the other 2 HUs	More comprehensive discussion of the RHMP program results are presented for the entire San Diego Bay in Section 10.6.
452	10-85	Port	Perhaps a comparison of urban runoff monitoring results and COCs for the HU can included in the discussion to address Core Mngmnt Question #3.	Discussion left as is based on other comments.
453	10-86	Port	Are there any results regarding bacteria from the Source Identification Study of single-family residences?	Discussion revised to include information about bacteria results.
454	10-87	Port	Remove last sentence in last paragraph. Last paragraph needs to be reworded. In one sentence , a TIE is recommended, the next its not.	Section left unchanged The recommendations are based on those listed in the triad assessment for permit compliance. Since we have already performed a TIE, the recommendation is to not perform a TIE until chemistry patterns in runoff change (if persistent toxicity is still apparent)
455	10-119	Port	Can the summarization of results with respect to the core management questions for the Bight study be integrated into the overall discussion starting on p. 10-158.	Results of the Bight 08 study are integrated into core management questions#1 and #2.
456	Section 10.4.4.2.2	Port	Why are all sites for San Diego Bay WMA random DWM program discussed under the Sweetwater HU?	Too few sites were located in one HA for meaning HA-specific assessments, Therefore all data were compiled and discussed under the Sweetwater section. A similar forma was followed in the Carlsbad WMA.
457	10-149	Port	The final paragraph mentions ambient monitoring in relation to Table 10-49 when I believe it should be 10-47. The three constituents listed are all medium frequency of occurrence. Suggest changing the last sentence in the paragraph above to state that all are medium	Change was made as requested.
458	Section 10.5.4.1.3	Port	The text states that sampling occurred at the Otay TWAS on December 4, 2008. Is this date accurate? Or was it October?	Sediment sampling occurred on December 4, 2008 as stated.
459	Table 10-58	Port	Table 10-58 indicates results of DWM. Is it appropriate to list the mean? Would the median or	The mean has been presented to demonstrate a general first cut at the results. For more in depth

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#	Section-Page #	Copermittee	Comment	Response to Comment
			geometric mean be more appropriate for some constituents?	analysis, the median or geometric mean would be more appropriate.
460	Otay Section	Port	More should be written about the Otay HU in the WMA summaries. There is more data this year which could be incorporated into questions 3 (urban runoff monitoring) and 4 (trash assessments).	The Otay HU had no ambient or wet weather monitoring. Since the jurisdictional dry and MS4 assessments were removed from the assessment section, there was insufficient data for this HU to discuss beyond what was already in the data tables.
461	Table 10-39	Port	I don't understand the Average Ratio column. Also this table does not seem to be referenced in the text.	The average of the action level ratio is the result divided by the action level. Average ratios above 1 suggest that exceedances of the action level are common. Such as fecal coliform and total coliform are above 1.
462	10-158 through 10-162	Port	Within each watershed summary addressing the core management questions, is it possible to differentiate between ambient and wet weather conditions? For example, regarding question #2: Can a comparison of ambient and wet weather spatial extents and magnitude of exceedances be discussed? Or for example regarding question #3: What are the general pollutants found in urban runoff by season? Are these consistent with receiving water quality, 303(d) list, and watershed COCs? Also place the discussion of how the Bight study address the core management questions here	The assessments were modified based on comments received from the monitoring workgroup, suggesting that one year's worth of data was insufficient for ambient assessments. This precludes a comparison between ambient and wet weather conditions. Bight 08 program results are described under questions #1 and #2.
463	10-143	Port	Why are graphs of total nitrogen and phosphorous included on Figure 10-38?	These two analytes had the highest instantaneous loads.
464	ES-1	County of San Diego	Second paragraph looks like it intends to inventory all monitoring programs for the WMA, but MS4 outfall monitoring and pyrethroid monitoring are not addressed.	These are summarized in Table ES5-1. Additional text has been added
465	ES-1	County of San Diego	The categories of monitoring presented in Table ES5-1 do not correspond with the description of monitoring programs in the paragraph above. One talks about MLS, TWAS, etc., the other says "Ambient Monitoring", "Wet Weather Monitoring".	Reference to Table ES.5-1 was removed from the paragraph.
466	ES-5-1	County of San Diego	Instead of check marks, Table ES5-1 would be more useful if it presented a range of years representing the monitoring record (i.e., Agua Hedionda MLS: 1998 – present, TWAS: 2007)	Checkmarks were used for consistency with previous reports.

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467	ES-4	County of San Diego	Need to describe that Table ES 5-3 is based on historical data set. Some of the high frequency COCs did not exceed benchmarks based on this year's sampling (i.e., TSS, persistent toxicity)	Text added
468	ES-4	County of San Diego	Bullets for "Agua Hedionda" and "Buena Vista" are not formatted correctly.	Formatting error not evident. Left unchanged.
469	5-75	County of San Diego	"Loma Alta HA" should be changed to "Agua Hedionda HA"	Corrected.
470	5-75	County of San Diego	Under 5.5.1.1, "Agua Hedionda HA" should read "Agua Hedionda MLS". Same error is made throughout the chapter.	Change was made as requested.
471	5-75	County of San Diego	Table 5-33 repeats exactly what is written in the paragraph before it. Use one or the other.	The text explains the table in a readable format. The table is a standard format for when more than one wet weather event is monitored.
472	5-88	County of San Diego	Do not need to continually reiterate what the 5 core mgmt. questions are.	Text left as is for consistency with other chapters.
473	5-89/5-90	County of San Diego	The detailed discussion of methods for Bight '08 seems disproportionate to discuss of methods for other programs. Consider moving to methods section and focus on results.	Copermittee Workgroup agreed that text was appropriate to provide context.
474	5.5.1.6	County of San Diego	Inappropriate reference to Penasquitos Creek	Text revised to state "No third party data sets were assessed during the 2008-2009 Monitoring Season in the Carlsbad WMA as part of this report."
475	5-103	County of San Diego	Remove last sentence "...field guidelines ... will be further refined ... to provide a better assessment ..." It's sufficient to say that this is the first year of the program.	Change was made as requested.
476	5-104	County of San Diego	Entire paragraph seems unnecessary. Maybe only should be presented in context of the watershed assessment ranking system discussion.	Paragraph was removed.
477	5-106/5-107	County of San Diego	Reference to # stations in other HAs not relevant to Agua Hedionda	All data from the random were grouped under Agua Hedionda.
478	5-108	County of San Diego	Results in other HAs not relevant to Agua Hedionda	All data from random were grouped under Agua Hedionda.
479	5-109	County of San Diego	Unrelated to this chapter, but MS4W-CA-08 is shown on map in San Marcos Watershed, but results are not presented in tables 5-46 or 5-47	Result for this site is presented in table 5-48. Site names corrected on map from "CA" to "CAR" to match tables and text.
480				Comment was withdrawn.

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481	5-250 (global?)	City of Encinitas	Since we don't have a long historical data set which shows a recurring trend of Bifenthrin persistence in the watershed, perhaps we should hold off on identifying this pyrethroid as a high priority COC.	Pyrethroids were removed from COC tables based on workgroup comments.
482	5-299	City of Encinitas	We recommend including "Submarginal" and "Poor" ratings in Table 5-92. Even if there were zero sites identified as submarginal or poor, this is still valuable data that should be displayed.	Table modified as requested to include rows for submarginal and poor ratings, which were zero.
483	ES-2, section 5	City of Encinitas	Several of these TMDLs are not currently "in development". Monitoring in preparation for TMDL development was conducted in FY 08-09 however, TMDL development has not been initiated. Consider revising table such that the TMDL status is more descriptive.	TMDL status has been updated
484	ES-2, section 5	City of Encinitas	The Beaches Bacteria I TMDL is currently being amended by the Regional Board. Rather than simply saying "Adopted" the revision process should be noted.	Text has been updated as requested.
485	Global	City of Vista	Results in Tables like 5-13 are misleading. The text states that the MS4 outfall monitoring results will be compared to receiving water benchmarks, for "comparative purposes only and the benchmarks do not apply directly to the MS4 results". However, the benchmarks are used for comparison and then taken to the next step of the diamond rating system, leading directly to COCs for the HAs. While the comparison may be necessary to determine the relative influence of the MS4 discharge on RW, this discussion should be limited in scope at this time. Currently very little data has been collected. Furthermore, in comparing MS4 data to one benchmark and the jurisdictional DWM data to action levels, there are instances where the SAME water sample would have two different standards applied. Understanding that this is not easily rectified, the recommendation is to NOT use the MS4 data in leading to diamond ratings at this time as the data set is small and the conclusions may not be valid.	The MS4 and jurisdictional dry weather diamond rating system have been removed from the text as request by the Copermittee Workgroup.
486	Global	City of Vista	Perhaps a footnote in the Integrated WMA	The MS4 and jurisdictional dry weather diamond

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#	Section-Page #	Copermittee	Comment	Response to Comment
			Assessment Tables for the MS4 (ambient) and RW (wet weather) results stating that conclusions are based on a limited set of data (1 year). MS4 comment applies across the CHU, the RW comment applies to Loma Alta and Buena Vista.	rating system have been removed from the text as request by the Copermittee Workgroup. Data in the Integrated Tables have been adjusted accordingly.
487	Global	City of Vista	Results in Tables like 5-16 where “No data” is stated are misleading. Suggest using “No analytes meeting minimum diamond rating criteria” or something similar to suggest that data was assessed but was not indicative of a WQ problem.	This table has been delted as requested by the Copermittee Workgroup.
488	Global	City of Vista	In the text on Page 5-63 and in other sections, the discussion of the DWM in 2008-09 and the MS4M also in 2008-09 is misleading. Can we state DWM performed in summer of 2008 and MS4M performed in summer 2009? The way it is presented, it appears that the data is from programs that were run concurrently, when this is not the case.	Monitoring was referred to as conducted in 2008.
489	Global	City of Vista	In Tables like 5-32 where the action is to conduct a TIE but the text below does not recommend a TIE, the table should be footnoted to state such.	Where TIEs were recommended as part of the Permit process, text was added in the table suggesting that Pyrethroids are the likely source of toxicity based on chemistry results and recent TIEs.
490	Global	City of Vista	Bight 08 tables such as 5-38 and 5-39 seem to have conflicting data for sample depth.	The results in the first table were inadvertently reported in meters. The results were corrected to feet to be consistent with the second table.
491	Global	City of Vista	Bight 08 discussion does not appear to include results of benthic infaunal samples. Some level of detail is included for other results (i.e. chemistry and toxicity), perhaps a summary of the benthic data is appropriate.	Individual lines of evidence for benthic data can be found in the appendix.
492	(Global?) Sec 12.1	City of Vista	Some discussion regarding the recent intercalibration results for organics (including pyrethroids) may be warranted. SCCWRP intercalibration results for pyrethroids illustrate large variability in results for standard and actual samples analyzed indicating that results may be dependent on the laboratory. This brings into question the quality of the data used in the assessments. This discussion should be referenced in the WMA sections as well.	A discussion of the pyrethroid results was added throughout the report in lieu of the recent intercalibration. A reference to the presentation was also added in the references section for data presented by Ken Schiff. However, the data results are supported by the toxicity lines of evidence for H. azteca and E. estuarius, and in light of recent TIEs that have been conducted in Agua Hedionda and Chollas Creek. Additionally, the synthetic pyrethroid chemistry results are reviewed for acceptance with laboratory control standards that verify method

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				responses.
493	Page ES-2	City of Vista	Table ES.5-2 lists several TMDLs as “in development” that may be misleading. The Regional Board has proceeded with development of TMDLs for Agua Hedionda Lagoon (bacteria, sediment) and those covered under Bacti I. There have been no other formal proceedings towards TMDL development in the Carlsbad HU. Specifically, TDS in AH Creek is not under development; Buena Vista Lagoon TMDLs are not under development; and San Elijo Lagoon TMDLs are not under development at this time. Monitoring data has been collected, however the TMDL development process has not been initiated for all waterbodies covered under Order 2006-0076.	Table was revised to state “Not developed” where applicable.
494	Page ES-4	City of Vista	Table ES.5-3, consider adding a footnote to the Wet Weather Receiving Water Assessment row indicating that the conclusions for Loma Alta and Buena Vista are only based on 1 year of data.	The executive summaries have been modified to reflect the Copermittees decision to remove the ambient, MS4, and jurisdictional assessments. Thus, a footnote is no longer applicable, since assessments were not conducted
495	Page ES-7	City of Vista	Under Question 4 concerning the re-growth of bacteria. Remove “in the receiving waters” from sentence 8 as bacteria re-growth has also been show to occur within the MS4.	Text revised
496	Page ES-4-2	City of Vista	Last paragraph –San Luis Rey WMA not Los Penasquitos	Text revised.
497	4-10	City of Vista	...Include Source ID 2008-09 study in last paragraph, as this program also provides info on urban runoff sources	This was included as a bullet under Urban runoff monitoring.
498	4-24	City of Vista	2nd to last paragraph before Ambient Monitoring section. Replace “literature” with “Monitoring Work Plan for the Assessment of Synthetic Pyrethroids in San Diego County”	Text changed
499	4-25	City of Vista	1st paragraph – change “2010” to “2009”.	Corrected
500	4-28	City of Vista	2nd paragraph, 1st sentence – Change site SMC 01919 to 01909	Corrected
501	4-38	City of Vista	Table 4-6, can we include calculated action levels for dissolved metals to see how it measures against	Figure 4-7 demonstrates how copper, lead, and zinc compare to the WQO.

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			results?	
502	4-55 (43)	City of Vista	Under Bacteria, change “occurring far below” to “and below”	Change was made as requested.
503	4-70	City of Vista	Update Threat to human and aquatic health definitions –see 2009 Trash Assessment Form	The definitions were based on those listed in the 2008 Dry Weather Monitoring Program as those were used by other jurisdictions at the time of monitoring.
504	4-90	City of Vista	Bullet at top of page – Change “again” to “against”	Change was made as requested.
505	4-96	City of Vista	Table 4-30 – Can MS4 Random Wet program results be used to assess the WMA?	This Table has been removed as requested by the Copermittee Workgroup
506	Sec 5.0	City of Vista	Paragraph 1, Sentence 1 – shouldn't these dates be for the 2008-09 Monitoring Season?	Corrected.
507	Page 5-6	City of Vista	Paragraph 1, last sentence – Change to “The final report and data were submitted to the Regional Water Quality Control Board in June 2009 as required.”	Corrected.
508	Page 5-6	City of Vista	Paragraph 2, Sentence 3 – This sentence is not correct. There have been no bacteria TMDLs adopted for the Pacific Ocean Shoreline at Agua Hedionda, San Elijo, or Batiquitos Lagoons.	Corrected.
509	Page 5-33	City of Vista	Table 5-11 – Check the title, are these data SMC results? The data appears to be from TWAS monitoring during 2007-08.	“Stormwater Monitoring Coalition Results” has been removed from the table caption.
510	Page 5-66	City of Vista	Paragraph 2 references Loma Alta and should reference Buena Vista.	Corrected.
511	Page 5-72	City of Vista	Under Question 2, should Loma Alta be Buena Vista here? Same comment for question 5.	Corrected.
512	Sec 5.5.1	City of Vista	Last sentence refers to Loma Alta, should this be Agua Hedionda?	Corrected.
513	Page 5-76	City of Vista	Paragraph 2 – Add sentence at end to state that recent samples for OP Pesticides have been below benchmarks. May want to note decreasing trend.	Text added as requested.
514	Sec 5.5.1.6	City of Vista	Why is this specific reference to third party data included here? Perhaps mention the data from the investigative order noting its availability but that it is not analyzed are part of this report.	Text revised to state “No third party data sets were assessed during the 2008-2009 Monitoring Season in the Carlsbad WMA as part of this report.”
515	Page 5-112	City of Vista	Last paragraph discussing land use. Would it be helpful to compare amounts of open space? It may also be helpful to look at an aggregate total of	The elevated sediment and nutrient loads at MS4W-CAR-02 may be associated with additional geographical features such as topography, drainage

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			agriculture, open space, vacant land, and construction as this may help with the understanding of the sediment load.	type and construction, and soil type. While the aggregate of all three may be important, specific source identification and drainage area assessment may be needed to better understand the sediment load.
516	Page 5-125 Page 5-131	City of Vista	Paragraph 4 references an incorrect 303(d) listing for indicator bacteria along the Pacific Ocean shoreline at Agua Hedionda Creek/Lagoon. This area of shoreline is not listed for bacteria. Paragraph 1, page 5-131 same comment.	Text revised.
517	Page 5-131	City of Vista	Paragraph 1 – this discussion is related to the assessment of wet weather criteria, references to dry weather results and influences should be removed.	Text deleted
518	Page 5-137	City of Vista	Question 2 – In comparing spatial extent, a comparison of the watershed MS4, creek RW, and lagoon RW is recommended. It may appear in places that the water quality in the MS4 is impacting the receiving waters upstream in the watershed (i.e. Agua Hedionda Creek), however this does not appear to be translating into impacts in Agua Hedionda Lagoon (based on Bight 08 data).	It may be inappropriate to assess the impacts of the MS4 and/or creek receiving waters on the coastal lagoons with the existing data. Although this is a very interesting and important question, it is beyond the scope with disparate programs. The new ABLM program will help to answer this question more fully.
519	Page 5-258	City of Vista	Sections for Loma Alta and Buena Vista both refer to dissolved metals in the first sentence. These should be dissolved minerals.	Text revised.
520	Sec 12	City of Vista	The Bight 08 Program was a regional program. Understanding details are included in the WMA assessments, it seems that a summary is warranted in the Regional Section of the report.	Regional Section was modified based on comments received from the Copermittee Monitoring Workgroup.
521	Page 12-32	City of Vista	Perhaps some discussion of the relative contribution of the residential areas in comparison to LM-SID-2. This site had the most elevated concentrations and resulting loads of pyrethroids, so for source purposes, a note may be warranted. It does appear that the residential areas are contributing, however how does that compare to what we see in the LM-SID-2 land use?	Site LM-SID-2 has commercial land uses which are noted in the text. Because samples are collected in the drain system and may be a mix of both commercial and residential land uses, the relative amounts cannot be determined without further study from the direct runoff from each land use. Additionally, application rates, times, and concentrations may differ throughout the year.
522	Page 13-11	City of Vista	A quick analysis and presentation of the total oil and grease data may also illustrate a very low exceedance rate, leading to a recommendation to remove it from	Comment noted. This section was revised following the Copermittee Monitoring Workgroup review.

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			the analytes list, also saving CoPermittees money. This may not be the proper location for a full discussion but it is good to present this data to set the stage for the ROWD.	
523	Sec 13.2.9	City of Vista	MS4 Outfall monitoring discussion headers are disorganized. The BOLD label “Dry Weather MS4 Outfall Monitoring” should be “Random MS4 Outfall Monitoring” and the subsequent discussion should reflect the dry and wet portions of the program.	This section was deleted from Section 13 at the request of the Copermittees.
524	ES-36, 2-11, 3-31, etc. mentioned several times throughout report	G. Skipper, MCB Camp Pendleton, Stormwater Branch Head	CPEN also participated in Bight 08 indirectly – we did not fund the effort, however we facilitated base access for SCCWRP to conduct lagoon sampling aboard the base.	Camp Pendleton was not excluded from comments such as those referenced (“In accordance with the Permit, the Copermittees participated in the Bight ‘08 study”)
525	ES-52, 3-20, 3-64, 3-66, 3-73	G. Skipper	Lower IBI scores do not necessarily indicate that water quality is impacting benthic populations. IBI scores are also dependent upon benthic habitat. Low-gradient, braided sand channels, such as the Santa Margarita River, provide less habitable substrate and therefore lower IBI scores. Nautilus presented a study of the SMR on this topic (benthics, also including toxicity) at the CASQA conference earlier this month – perhaps a useful reference for the co-permittees. Even reference streams can have poor substrate and low IBI scores. This qualification is discussed in the text in some places but not others, and is not mentioned in the Executive Summary, although it should be.	Your general statement is correct, however there have been no comprehensive studies (in Southern California) to determine the extent of the effect of low gradient/fine particulate habitats on benthic communities, particularly in reference streams. We did mention habitat as a possible factor in the SMR ES (p. ES-4, second paragraph), but otherwise we generally refrain from speculating on the specific stressors that might lower IBI or O/E scores.
526	2-4	G. Skipper	Please revise the first sentence as follows: “The Lower Santa Margarita River is monitored by US Marine Corps Base Camp Pendleton. However, Camp Pendleton is not a co-permittee, therefore the co-permittees conducted monitoring in the unincorporated area of the County of San Diego upstream of the Camp Pendleton fence line to ensure permit compliance.”	Text revised
527				No comment.

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#	Section-Page #	Copermittee	Comment	Response to Comment
528	Section 3.0 SMR Watershed	--	The below comments apply to Section 3.0, Santa Margarita River Watershed.	No response required.
529	ES-1, 3-3	G. Skipper	Final sentence of 2nd paragraph: The two military installations are Marine Corps Base Camp Pendleton, and Naval Weapons Station Seal Beach, Fallbrook Detachment.	Text added as requested.
530	3-3	G. Skipper	Section 3.2.2 – This population does not include CPEN and Fallbrook. According to the Pendleton website, the population of the base is 42,000. NWS Fallbrook only has a few hundred personnel, by contrast.	Text added as requested.
531	3-5	G. Skipper	Last sentence should be revised to state that TMDL monitoring is ongoing.	Text added as requested.
532	3-8	G. Skipper	CPEN/NWS Fallbrook jurisdiction is incorrectly identified on the figure as San Diego County jurisdiction.	Map was revised per comment #533.
533	3-11	G. Skipper	This figure is too small to clearly delineate the symbols. Please increase the map, move the legend, and try a black outline around the symbols to improve viewing. What would be even more helpful is to zoom in to the area where all the monitoring stations are located. Similarly, inclusion of a table with specific locations of the stations would be helpful. (Street name, etc.) I would like to be able to see where the new MLS is located with respect to the CPEN/NWS Fallbrook fenceline, but it is impossible to determine at this scale and without the boundary shown.	Map scale was changed to improve identification of sites. MCB Camp Pendleton boundary added to map.
534	3-32	G. Skipper	The last sentence of #4 should be deleted. It implies that the primary source of pesticides comes from runoff from the Singh Farm aboard CPEN and there is no evidence to support that statement. Upstream (off base) agricultural groves exist as well.	Sentence deleted.
535	3-48	G. Skipper	Last paragraph: In addition to catchment size and land use, a third parameter of critical importance in explaining these results is the percentage of directly connected impervious area. I see an interesting correlation of TN and TP, but not TSS.	Text added as requested.

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#	Section-Page #	Copermittee	Comment	Response to Comment
536	3-51	G. Skipper	Nice inclusion of aerial photo to demonstrate land use and station location. More of those throughout the report would be a nice addition.	Comment noted.
537	3-53	G. Skipper	Last paragraph: What is the likely source of the sulfates? (The draft 2008 303(d) listings now show De Luz Creek is impaired for sulfates.)	Inferences to sources are not made at this time as further study would be needed.
538	3-54	G. Skipper	What is the likely source of the iron and manganese?	Inferences to sources are not made at this time as further study would be needed.
539	3-59	G. Skipper	Were there any data gaps in the USGS gage data where the hydrologic flows had to be estimated? (ie: gage was down for maintenance, blow-outs, etc.) Is this the USGS gage aboard CPEN, or a different station? It would be helpful to state the location of the USGS gage and show it on a map along with the new Mass Loading Station.	There were no data gaps. Continuous data were provided by the USGS for SMR, located approximately 9.5 miles downstream of the SMR MLS. Data from the USGS gage were used to estimate the flow at the MLS. The USGS gage data were adjusted to compensate for the smaller tributary area as discussed in the report.
540	3-59	G. Skipper	Why is this discussion of methodology included with no results? Load estimation based on one storm is very approximate and should not be used to make decisions – particularly considering the more polluted runoff that occurs in the first runoff event of each rainy season. The result could be very misleading.	Load results are included in Appendix J as referenced. They were included in Appendix to reduced document size as requested by the Copermittees.
541	Table 3-21	G. Skipper	After “Total Nitrogen” insert (calculated) or include a footnote.	Footnote added.
542	3-64, 3-66	G. Skipper	2nd Paragraph: I recommend placing the second sentence first for clarity.	Done.
543	3-71	G. Skipper	Using A to D as prioritization is a bit counterintuitive – it looks like a grade, where a D would be bad, but in this case, D would be a lower priority, which likely means, if not good, then not as worrisome as A.	Comment noted. The priority ratings are based on the method developed during the Baseline Long-Term Effectiveness Assessment Document.
544	General Comment	G. Skipper	Some of the discussion is confusing due to the change of location for the MLS station. Perhaps a paragraph should be included up front which explains the situation, including the dates/location for the “historical” MLS station aboard the base, and the dates/location for the “new” station. A map would also be helpful. Footnotes should be included for data tables using data from the “old” station.	Discussion was revised in some areas based on these and other comments received.
545	12-30	City of La Mesa	We recommend that the text on 12-30 be changed. Due to the fact that only 1 sampling event was	Text revised as requested.

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			<p>collected in Del Mar, we do not support the language stating that “La Mesa” has the highest concentrations of the general chemistry constituents, indicator bacteria, pyrethroids, and trace metals. For example, out of the six sampling events for indicator bacteria for example, 3 of La Mesa’s samples were lower than Del Mar’s, and 3 were higher. We recommend the following text in lieu of 12-30.</p> <p>“Sites were sampled yielding concentrations of general chemistry constituents, indicator bacteria, pyrethroids, and trace metals. Specifically, for the general chemistry constituents, Site LM-SID-1 had the highest levels for some of the constituents, including chloride, nitrate, total nitrogen, total dissolved solids (TDS), and total hardness (Figure 12-12). The high levels of these constituents compared to the other sites with periodic flows, indicate that groundwater influences are likely at this location which were supported by field observations and flow monitoring data.” (or similar)</p>	
546	12-38, 13-19	City of La Mesa	<p>We recommend that the text “The highest loads for the general chemistry constituents were measured at the La Mesa study area. The highest loads were from TDS and Chloride” on page 12-38 be changed to “The highest loads were from TDS and Chloride and were sampled at LM-SID-1.” (or similar)</p> <p>We do not support “La Mesa” being called out as having the highest loads, when the majority of sampling was completed in La Mesa due to a lack of applicable sampling conditions in Del Mar.</p>	Sentence revised as requested.
547	ES-1	County of San Diego	Par. 2 last sentence “However..development.” Please, rewrite to “However, several changes are being proposed in the 2008 Draft 303(d) List currently under development.	Sentence revised as requested.
548	ES-2	County of San	Par. 10; sentence 2 “The results for the Los	Text corrected.

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		Diego	Peñasquitos WMA are summarized in Table ES.4-3.” -Actually, results summarized in Table ES.4-3 are for SLR WMA. Please correct.	
549	ES-6	County of San Diego	Par. 1 “The results are illustrative in that over 90% of the sites were not flowing at the time of the survey.” – Please, delete this sentence.	Unable to locate this text.
550		County of San Diego		No comment.
551	Section 4.0; Page 4-1	County of San Diego	Par. 11 “The MS4 Outfall Monitoring Program was implemented in 2008–2009. The program used a stratified random design for a regional evaluation of the MS4 outfalls as well as a targeted approach at the watershed level. Targeted dry weather MS4 monitoring was conducted by the jurisdictions.” - it should be mentioned here that the Program included both wet and dry weather MS4 monitoring.	Following text was added: “Both dry and wet weather monitoring was conducted.”
552	Section 4.0; Page 4-1	County of San Diego	Par. 12 “The Source Identification Program was implemented in 2008–2009. Two sites were assessed, including one in the City of La Mesa in the San Diego Bay WMA and one in the City of Del Mar in the Los Peñasquitos WMA.” – this paragraph refers to WMA outside of the SLR and should be revised to refer specifically to SLR. If no Source ID Program was implemented in 08/09 at SLR, this paragraphs should be dropped or should state that no Source ID was implemented.	The section was revised to discuss this regionally applicable program.
553	Section 4.0; Page 4-2	County of San Diego	Par. 1 “The Copermittees participated in the Stormwater Monitoring Coalition (SMC) Bioassessment Workgroup.... Ambient water quality monitoring and rapid stream bioassessments were conducted at 16 randomly selected sites throughout the region, which included some WMAs, but not all.” – This paragraph should specifically refer to SLR WMA (not the entire program) and should be rewritten to reflect just the work conducted at SLR WMA.	Following text was added: “Four ambient sites and four bioassessment sites were located within the San Luis Rey WMA.”
554	Section 4.0; Page 4-2	County of San Diego	Par. 2; First sentence “The WMA assessment methods were modified to utilize bioassessment data	Text modified to read: “The WMA assessment methods were modified to utilize bioassessment data

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			from previous years since the MLS sites were not sampled in 2008–2009 due to the Bight '08 Monitoring Program.” - this is not true. The MLS was sampled during one wet weather event in 2008. Please, rewrite.	from previous years since bioassessment sites were not sampled at the MLS sites in 2008–2009 due to the Bight '08 Monitoring Program. This provides an assessment of wet weather and dry weather as well as an integrated assessment of water quality conditions in the WMA”
555	Section 4.2; Page 4-3	County of San Diego	Par. 4; First sentence “The San Luis Rey River...County. “ – Please, rewrite to “The San Luis Rey River WMA (Hydrologic Unit (HU) 903.00) is the largest WMA assessed in this report, and at 359,887 acres, it is the third largest watershed within or partially within San Diego County.”	Text revised as requested
556	Section 4.2; Page 4-3	County of San Diego	Par. 7; Sentences 2 and 3 “Land use becomes... watershed” - Please, rewrite to: “The WMA becomes progressively less urbanized from west to east. The Monserate HA is primarily undeveloped (59%) with agriculture and commercial recreation land uses comprising 17% and 13% of the area respectively.”	Text revised as requested
557		County of San Diego		Comment retracted.
558	Section 4.2; Page 4-3	County of San Diego	Par. 7; Sentence 4 “In contrast to the Lower San Luis Rey HA, the Warner Valley HA is primarily undeveloped (82%) and open space (10%) land use. All other land uses in the Warner Valley HA compose the remaining 8%.” – please rewrite the sentence to properly describe the land use compositions of the Lower SLR HA and the Warner Valley HA (right now the two are scrambled together – information is missing and the statement does not make a logical sense...).	Text corrected.
559	Section 4.3; Page 4-11	County of San Diego	Figure 4-5 (as well as Figure 3-5 and corresponding figures in sections referring to the other WMAs), the triangle symbols referring to the Jurisdictional Dry Weather and MS4 Random Wet Weather Urban Runoff Monitoring Locations should be re-drawn in more contrasting colors. Right now they are light and dark orange – difficult to tell apart on the map.	Color of MS4 wet stations were changed for better differentiation.
560	Section 4.3.1;	County of San	Par. 4; Sentences 1 and 2 “The wet weather	Text revised as requested

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#	Section-Page #	Copermittee	Comment	Response to Comment
	Page 4-12	Diego	evaluation... exceedance.” – Please, rewrite to “The 2008-2009 wet weather monitoring at the MLS was conducted during one storm event, and the water quality and toxicity data were evaluated by comparison to water quality benchmarks and through the examination of magnitudes of exceedance.”	
561	Section 4.3.1.1; Pg. 4-12 and Fig. 4-5	County of San Diego	Last Paragraph; first sentence “Four receiving water sites were monitored during ambient conditions in the San Luis Rey River WMA as part of the 2008–2009 SMC Monitoring Program: Site 00153 in HSA 903.11, Site SMC-01909 in HSA 903.12, Site SMC-00457 in HSA 903.13, and Site 01717 in HSA 903.21 (Error! Reference source not found.)” – it is not apparent from this sentence which of these four stations are located where. The stations should either be labeled in Fig. 4-5 or their locations should be more precisely described in this paragraph.	Text added
562	Section 4.3.1.1; Page 4-15	County of San Diego	Legend of Table 4-3. Please Delete “** Results are significantly different from the control.” ** is not used anywhere in the table.	Footnote was removed from Table 4-3.
563	Section 4.3.1.1; Page 4-15	County of San Diego	Par. 1; Sentence 2 “f these, water quality benchmarks are available for total nitrogen and total phosphorus.” – According to table 4-3, WQ benchmarks are also available for Nitrate and Nitrite and should be discussed here.	Nitrate and nitrite added to discussion.
564	Section 4.3.1.1; Page 4-15	County of San Diego	Par. 3; Sentence 2 “Elevated ... conditions.” Please rewrite to: “Elevated chloride and sulfate levels are likely the result of elevated dissolved solids which have historically been problematic region-wide during ambient conditions.”	Text revised as requested

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565	Section 4.3.1.3 Page 4-19 and Fig 4-5	County of San Diego	Par. 2 "Four randomly placed SMC monitoring reaches... The site locations are shown on Figure 4 5." These site locations are not indicated in Fig. 4-5. Please add the locations and label in the figure so each monitoring station can be identified on the map.	SMC monitoring sites are shown on the map as green squares (SMC Ambient Triad).
566	Section 4.3.1.3; Page 4-20	County of San Diego	Fourth column heading of Table 4-4: "Corser" should be "Couser"	Text changed as requested
567	Section 4.3.1.3; page 4-22	County of San Diego	The misspelling "Corser" is repeated twice in the first few lines on the page. It should be spelled "Couser".	Change was made as requested.
568	Section 4.3.1.4; page 4-26	County of San Diego	In the legend of Table 4-6, please delete "* Indicates detection limit exceeds water quality benchmark." The * is not used anywhere in the table.	Footnote was removed from Table 4-6.
569	Section 4.3.1.5; page 4-28	County of San Diego	Par. 2; Sentence 1 "As with ambient monitoring, the ratio of a constituent concentration during the storm event that exceeded its respective benchmark was compared to its benchmark value to answer the magnitude portion of Core Management Question 2..." Please, rewrite as follows: "As with ambient monitoring, ratios of constituent concentrations and their benchmark values were calculated for wet weather samples to answer the magnitude portion of Core Management Question 2..."	Text changed as requested
570	Section 4.3.1.6; page 4-34	County of San Diego	Par. 2 "The Camino del Rey TWAS Site was combined with the Mission Road historical site to assess trends in this portion of the watershed. The Mission Road Site was monitored under the previous monitoring permit and was located approximately 2 miles downstream of the new TWAS site." - this may not have been appropriate. It would probably be better if the two sites (2 miles apart) were separated and the trend analysis was conducted on just the Mission Rd. site.	We originally decided to combine the sites because the physical habitats and IBI scores were very similar and there were no significant changes in land use or elevation between the sites. We have removed the 2008 TWAS data from the figure.

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571	Section 4.3.1.6; pages 4-34 through 4-36	County of San Diego	Part of the legend in Figure 4-11, 4-12, 4-13 and 4-14 is "touching" the graph. Please reformat.	Comment noted, but unable to incorporate change.
572	Section 4.3.1.9. Page 4-41	County of San Diego	Par. 3. Last sentence "Transmissivity also decreased moving deeper into the harbor as water circulation decreased and particulates increased; this trend was most apparent at depth." – which depth is this sentence referring too?	Text changed to: "this trend was most apparent in deeper water"
573	Section 4.3.1.9. Page 4-43	County of San Diego	Par. 8 referring to the sediment quality study. Quantitative grain size analysis results and the results of animal studies should be included in the report as an appendix.	All RHMP data has been added to Appendix L.
574	Section 4.3.1.9. Page 4-44	County of San Diego	Par. 2 Sediment Chemistry data are not presented for all stations. There is a reference to Appendix L but the appendix does not actually contain the data. Please include all raw sediment chemistry data as well as the calculated ER-L and ER-M values in the report. It is suggested that the raw data be included in the appendix while the ER-L and ER-M values be included in Section 4.3.1.9 in a separate table.	For the purposes of assessing results in light of the SQOs, the ER-L and ER-Ms are inappropriate. The results are included in Appendix L which were added as requested.
575	Section 4.3.1.9. Page 4-45	County of San Diego	Par. 3 Please, provide the actual BRI scores in the report.	BRI scores were added as recommended.
576	Section 4.3.1.9. General Comment	County of San Diego	In this section RHMP data for all harbors/ marinas combined are discussed (i.e. Tables 4-14, 4-15, 4-16 and 4-17 and the relevant paragraphs). It would make the section more concise if the data presented were limited to just Oceanside harbor as this report section pertains only to the SLR WMA.	Because the RHMP is a regional program, the discussion was left as is. By isolating the results to only Oceanside Harbor, the result may be taken out of context with the overall goals of the study questions and how results are interpreted.
577	Section 4.3.2.1; Page 4-51	County of San Diego	Paragraph 8; Last Sentence "The complete data set is presented in Appendix M." – The "2008-2009 Dry Weather Data- Jurisdictional – Lab and Field Analysis" Table in Appendix M contains analytical Data, field test kit data, and field measurements. No field observations and no flow estimates are included....	Text changed to: "The complete analytical data set is presented in Appendix M."
578	ES-2	City of	Last paragraph; Change Los Penasquitos to San Luis	Text corrected

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#	Section-Page #	Copermittee	Comment	Response to Comment
		Oceanside	Rey	
579	ES-6	City of Oceanside	2nd full paragraph, 3rd to LAST sentence; And an additional "at" for "at least one"	Text corrected
580	4-20	City of Oceanside	Table 4-4; Percent canopy cover for SLRR at Foussat needs a "%"	Text corrected
581	4-21	City of Oceanside	First line on top of page; Define AFDM if it's the first use of the acronym	Defined in Table 4-4
582	4-51	City of Oceanside	Bullet points under first paragraph; Should trash assessment be added to the program components? It is discussed in the following pages.	Text corrected
583	4-52	City of Oceanside	First full sentence; "All but three..." The map makes it look like only two were outside of the Lower HA and the text on p. 4-55 (2nd paragraph) also says that only 2 sites were in the Middle HA and none in Warner HA.	Text corrected
584	4-54	City of Oceanside	Table 4-18; Conductivity and turbidity action levels are narrative in the Dry Weather Program (and so presented differently in our JURMPs). 5 mS/cm and 20 are/were not used as action levels. Perhaps just a sentence added to clarify would be good.	Footnote was added to the Jurisdictional Dry Weather Tables.
585	4-61	City of Oceanside	1st full paragraph, Second to last and last sentences; Change "much greater" to a magnitude to clarify what "much" means	Text additions made
586	4-66	City of Oceanside	Table 4-23; Entero number for SLR-01 change < to >	This result is correct. Due to technician error the result is < not >
587	4-76	City of Oceanside	Sect 4.4; No results presented in this section, just reference to Appendix. Reason? Should a summary of just the reporting year load for COCs be summarized here, at a minimum?	This section acts as a placeholder and to maintain consistency with other sections.
588	4-78	City of Oceanside	First bullet point on page; Change "again" to "against"	Change was made as requested.
589	4-79	City of Oceanside	Table 4-27; There is a reference "2" but no associated footnote	This table has been removed at the request of the Copermittees.
590	ES-4	City of Oceanside	Table ES.5-3; Bight 08 format bullets	Bullets formatted.
591	ES-6	City of Oceanside	Paragraph under Q.1, last sentence; Change "water quality was good" to "bacteria and TSS were below benchmark values in all ambient water samples."	Change was made as requested.

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592	5-6	City of Oceanside	1st paragraph (partial), Last sentence; Change "report and data ARE" to WERE	Change was made as requested.
593	5-15	City of Oceanside	Bullets; Same comment as above, should we add trash as a component?	No additional text added.
594	5-25	City of Oceanside	5th paragraph, 1st sentence; "Receiving benchmarks" add "water"	Change was made as requested.
595	5-42	City of Oceanside	Section 5.3.5.2; Suggest changing first sentence to take out recommendation that is not applicable. Could say that "An MLS is not required by the permit; the Copermittee Workgroup will review..."	Change was made as requested.
596	Watershed Executive Summaries	City of Del Mar	It seems too redundant to have Executive Summaries for the Watershed sections. The Executive Summaries should be removed from the Monitoring Report. They can be given to the individual Watersheds for use in their WURMP Annual Reports as applicable.	Comment noted. However, the WMA executive summaries were left as is based on direction for the Copermittee Monitoring Workgroup.
597	Throughout Section 6	City of Del Mar	Monitoring site names need to be consistent. Sometimes a site is called SDC2 or TWAS2. The site names in the body of the report should match the site names on the maps	Text was updated for the TWAS-2 locations.
598	6-16	City of Del Mar	The first full paragraph on this page discusses TSS. It refers the reader to Table 6-3 for the TSS results/info. TSS does not appear to be in Table 6-3. This reference needs to be changed or TSS needs to be added to Table 6-3	TSS is included in Table 6-3 right above hardness.
599	6-60	City of Del Mar	Table 6-16 - Why are some spaces in the table blank? Does that mean there was none detected, not sampled, etc.? There should be a footnote or something added addressing the blank spaces	Blank spaces in the table were noted as "NS." A footnote was added to the table to indicate that "NS"="Not Sampled".
600	6-61	City of Del Mar	Table 6-17 – "Not Applicable" needs to be added at the bottom of the table after "NA="	The footnote for "Not Applicable" was not necessary for the table and therefore "NA=" was deleted.
601	6-61	City of Del Mar	Table 6-17 - Why are some spaces in the table blank? Does that mean there was none detected or was it not sampled? There should be a footnote added addressing the blank spaces	The table was updated to replace blank cells with "NS" (not sampled).
602	6-81	City of Del Mar	"Core Management Question 3 was partially answered through the MS4 Outfall Monitoring Program" Why is it only partially answered? This needs to be explained; what is the other part?	Question 3 ("What is the relative urban runoff contribution to the receiving water problems?") cannot be fully answered by the regional monitoring program alone. The Copermittee Monitoring

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#	Section-Page #	Copermittee	Comment	Response to Comment
				Workgroup is aware of this and is working to address the question through recently implemented programs.
603	6-82	City of Del Mar	"Core Management Question 4 is partially answered through land use analysis and limited monitoring data". Why is it only partially answered? This needs to be explained; what is the other part?	Question 4 ("What are the sources of urban runoff that contribute to receiving water problems?") cannot be fully answered by the regional monitoring program alone. The Copermittee Monitoring Workgroup is aware of this and is working to address the question through recently implemented programs.
604	6-82	City of Del Mar	The trash assessment paragraph under Core Management Question 4 is confusing and should be rewritten. If a reader did not read the trash assessment section earlier it would be difficult to understand this paragraph (i.e. what does suboptimal, marginal, and submarginal mean?). "The potential trash route was listed as dumping for the Submarginal rated site in the San Dieguito River WMA". Without the supporting information/explanation from the trash assessment section this sentence doesn't really make sense.	Providing background information for each of the monitoring programs would be too comprehensive for the summary section.
605	6-82	City of Del Mar	Core Management Question 4 states that "The Jurisdictional DWM Program, the CSDM Program, the Source Identification Program and trash assessment in the receiving waters provide some information on urban runoff sources. More detailed discussion of urban runoff sources can be found in each Copermittee's Jurisdictional Urban Runoff Monitoring Program Annual Report and in the CSDM Program Annual Report". The next 2 paragraphs discuss the trash assessment and source ID. Is the reader supposed to refer to the JURMP Annual Reports for information on the Jurisdictional DWM Program? If so, this should be stated. For example..."More detailed discussion of urban runoff sources in regards to the Jurisdictional DWM Program and the CSDM Program can be found in each Copermittee's JURMP Annual Report and in the CSDM Program Annual Report respectively".	Sentence revised as requested.

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606	7-17	City of Del Mar	The second paragraph on this page discusses TSS. It refers the reader to Table 7-3 for the TSS results/info. TSS does not appear to be in Table 7-3. This reference needs to be changed or TSS needs to be added to Table 7-3	TSS was added to table.
607	7-26	City of Del Mar	Table 7-6- The heading on the table needs to be changed. The last column should say Los Peñasquitos and not "Los Peñasquitos Lagoon" if it is referring to the Watershed	"Lagoon" deleted
608	7-45	City of Del Mar	Question 4. "This question can be partially answered by assessing the nature of contaminants found in the lagoon/estuary sediments". Why is it only partially answered? This needs to be explained; is there another part?	See response to comment #603.
609	7-45	City of Del Mar	Question 5. This paragraph is confusing. It states that the Bight '08 provides valuable baseline data. Bight '08 is then compared to ABLM but then states that the Bight '08 and ABLM may result in non-comparable results. Can they be compared? If not then it should not be mentioned. Bight '03 is also discussed/compared. What does this all mean? Are things staying relatively the same? Can it be said if it is getting better or worse? Is Bight '08 a baseline and if so should it be compared to anything previous then? Need some sort of summary sentence answering the question "Are conditions in receiving water getting better or worse?"	Because these programs have slight differences and answer specific questions relevant to the time the program was developed, some information can be inferred. However, the Bight 08 data is the first year that compares results from multiple stations throughout the lagoons and was assessed with the new SQO guidelines. Previous years programs were either worst case scenarios (ABLM) or were single station results (Bight 03).
610	7-70	City of Del Mar	Table 7-21 - Why are some spaces in the table blank? Does that mean there was none detected, not sampled, etc? There should be a footnote or something added addressing the blank spaces	Blank spaces in the table were noted as "NS." A footnote was added to the table to indicate that "NS"="Not Sampled".
611	7-72	City of Del Mar	Table 7-22 - Why are some spaces in the table blank? Does that mean there was none detected, not sampled, etc? There should be a footnote or something added addressing the blank spaces	The table was updated to replace blank cells with "NS" (not sampled).
612	7-87	City of Del Mar	Table 7-31 – The A for Sediments in Miramar Reservoir should be shaded for 2006 SWRCB Section 303d listing	The LTEA results are established in 2005 and do not reflect changes to the 303(d) list in subsequent years.
613	7-90	City of Del Mar	"Core Management Question 3 was partially	See response to comment #602.

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			answered through the MS4 Outfall Monitoring Program". Please explain why it was partially answered; how can this question be fully answered? What is missing?	
614	7-91	City of Del Mar	"Core Management Question 4 is partially answered through land use analysis and limited monitoring data". Why is it only partially answered? This needs to be explained; what is the other part?	See response to comment #603.
615	7-91	City of Del Mar	Core Management Question 4 states that "The Jurisdictional DWM Program, the CSDM Program, the Source Identification Program and trash assessment in the receiving waters provide some information on urban runoff sources. More detailed discussion of urban runoff sources can be found in each Copermittee's Jurisdictional Urban Runoff Monitoring Program Annual Report and in the CSDM Program Annual Report". The next 2 paragraphs discuss the trash assessment and source ID. Is the reader supposed to refer to the JURMP Annual Reports for information on the Jurisdictional DWM Program? If so, this should be stated. For example..."More detailed discussion of urban runoff sources in regards to the Jurisdictional DWM Program and the CSDM Program can be found in each Copermittee's JURMP Annual Report and in the CSDM Program Annual Report respectively".	Text revised as recommended.
616	7-91	City of Del Mar	The trash assessment paragraph under Core Management Question 4 is confusing and should be rewritten. If a reader did not read the trash assessment section earlier it would be difficult to understand this paragraph (i.e. what does suboptimal, marginal, and submarginal mean?). "The potential trash route was listed as Littering for three of the six sites rated as Submarginal or Poor in the Los Peñasquitos Creek WMA and Dumping for the three remaining sites.". Without the supporting information/explanation from the trash assessment section this sentence doesn't really make sense.	Providing background information for each of the monitoring programs would be too comprehensive for the summary section.
617	7-92	City of Del Mar	The last paragraph of the Recommendations section	Text revised as recommended.

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			<p>states “Based on ambient weather conditions, conducting TIE to identify contaminants of concern and addressing upstream sources as a high priority is recommended. However, as mentioned above, the level of toxicity observed has not been sufficient to warrant a TIE at this time”. This recommendation is confusing. If the toxicity levels are not sufficient to warrant a TIE at this time, then don’t recommend activity/management actions at this time. Perhaps the language from Section 13 should be added here instead of what is currently written in this section.</p> <p>“Based on the results of ambient weather monitoring during the 2007–2008 Monitoring Season, a TIE was recommended for ambient weather toxicity to <i>C. dubia</i> reproduction in the Los Peñasquitos WMA at Site LPC-TWAS-1 (Carroll Canyon). However, toxicity results were below the threshold recommended for a TIE during the two events monitored in 2007–2008. In the event that persistent low level toxicity is observed during the next ambient weather monitoring cycle in north San Diego County, additional dilution series to refine <i>C. dubia</i> toxic endpoints and/or implementation of additional highly sensitive tests are recommended.”</p>	