

#	Commenter	Category	Comment	Response to Comment
1	Escondido Neighbors United (ENU)	Determining Priorities	"...very concerned with the very limited selection of 'Highest Priority' water quality issues to be addressed. In the case of the San Dieguito WQIP, there is only one highest priority and it is located in Del Mar. Our watershed needs more attention than just one, end-of-pipe priority."	Many factors were considered to develop the methodology. The Responsible Agencies must comply with existing TMDL regulations; therefore, TMDLs are a primary factor of the methodology, elevating them to highest priority. The Responsible Agencies' methodology does allow for the additional screening of non-TMDL impairments; however, it was determined that those conditions did not warrant elevation to highest priority due to a lack of monitoring data linking MS4 discharges to those conditions. It was also determined that the strategies proposed to address TMDL-associated conditions provide multiple benefits to other pollutants, and therefore would address other conditions in the watershed. The strategies identified to address the highest priority water quality condition (HPWQC) provide benefits to other priority water quality conditions throughout the watershed. Although the HPWQC is the lagoon mouth, strategies are implemented city/county-wide by Responsible Agencies. Table 4-18 in Section 4.3.2 identifies estimated load reductions for other pollutants for the San Dieguito watershed. There are also strategies and monitoring programs included in the WQIP that will provide more information on priority conditions that currently have data gaps. Section 4.3.2 was revised to further clarify that, if it is demonstrated through monitoring the current highest priority condition (Bacteria) is no longer an issue, the WQIP will be modified to identify new highest priority water quality conditions.
2	Escondido Neighbors United (ENU)	Determining Priorities	"Designate additional water quality priorities"	See response to comment #1. Note there's a difference between "priority water quality conditions" vs "highest priority water quality conditions." A list of priority water quality conditions for the San Dieguito watershed is provided in Appendix F.
3	Escondido Neighbors United (ENU)	Determining Priorities	"Designate Felicita Park as a high priority"	Suspected impairment of Felicita Creek due to VOCs was added as a water quality condition in Appendix F, but was not identified as priority or highest priority condition. There is no data linking the MS4 to the condition, and the suspected source of the condition is the Chatham Brothers Barrel Yard. Impairment of MUN in Felicita Creek due to TDS is listed as a priority condition.
4	Escondido Neighbors United (ENU)	Additional Strategies	"Prohibit the sale and use of invasive plants in the watershed"	The prohibition of sale of invasive species is beyond the Water Quality Improvement Plans on a state level. However, all Responsible Agencies have ordinances prohibiting or discouraging invasive species and have included strategies in Appendix I involve removal of invasive plants, and/or use of non-invasive plants in new development/redevelopment through ordinances.
5	Escondido Neighbors United (ENU)	Additional Strategies	"Increase the required actions for retrofitting existing development"	Increased required actions are captured within each Responsible Agency's JRMP and minimum BMP updates.
6	Escondido Neighbors United (ENU)	Additional Strategies	"Increase the requirements for new development such as requiring rainwater harvesting and xeriscaping in new projects"	Requirements for new development are captured within each Responsible Agency's JRMP, under Development Planning. Outreach and/or incentives for rainwater harvesting and xeriscaping are included in Responsible Agencies' strategies tables in Appendix I.
7	Escondido Neighbors United (ENU)	Additional Strategies	"Increase commitment to restoring local streams and habitats"	Candidate areas of existing development for stream, channel, and/or habitat rehabilitation projects have been identified as part of each Responsible Agency's JRMP. This activity is also included as a strategy in each Responsible Agency's strategy table in Appendix I of the WQIP. In addition, the optional Offsite Alternative Compliance Program includes methods for identifying and assessing potential projects.

#	Commenter	Category	Comment	Response to Comment
8	Escondido Neighbors United (ENU)	Numeric Goals	"Copermittees should choose numeric goals and strategies that will be capable of demonstrating progress in cleaning up our local waterways."	The following text was added to Section 4.1.: "TMDL targets interpret the existing water quality standards. Water quality standards include beneficial uses, water quality objectives (WQOs) that are established at levels sufficient to protect those beneficial uses, and an antidegradation policy to prevent degrading waters that are better than the quality established as WQOs (Regional Board 2010). Therefore, using the TMDL targets and compliance pathways as Water Quality Improvement Plan goals provides a direct connection to protecting the beneficial uses identified in the highest priority water quality condition."
9	Laura Hunter	General Comment	"The primary goal should be water quality improvement and strengthen requirements. The document lists the 'prevention of further degradation' of water quality in the WMA as the first and primary goal. This is too low a goal. We should be setting a goal to 'improve' the water quality in the region where it is degraded. Status quo is not where we want to stay."	The goal is to always improve water quality and to prevent further degradation of the environment.
10	Laura Hunter	Comment to Board	"The permits to date have not been effective to achieving the water quality necessary for the region. Part of this is the problem of lack of compliance and part is the permits have not required enough action to address the problem. Now is the time and these WQIPs are the place to address this. They should be strengthened so that we are not still in the same place 5 years from now."	Comment forwarded to the Regional Board.
11	Laura Hunter	Determining Priorities	"The SDGWQIP should include additional 'priority' or 'focus' areas that will receive attention and strategy development over the permit term. The SDGWQIP is grossly deficient in that it only includes one priority focus area for the entire 346 square mile watershed. This is the bacteria issue at the discharge point to the ocean. This is insufficient a priority to see 'improvement' in the quality of the watershed if this is the sole focus for the next 5 years. "	See response to comment #1. The Permit does not require identification of "focus" priority water quality conditions. In addition, Appendix K provides prioritized geographical areas where bacteria loads are estimated to be the highest. Lastly, the Bacteria TMDL identified the entire San Dieguito watershed (346 acres) as the drainage area that affects the shoreline impairment due to bacteria loadings (see Table 3-1, Beach and Creeks Addressed in this TMDL Analysis, of the TMDL http://www.waterboards.ca.gov/sandiego/water_issues/programs/tmdls/docs/bacteria/updates_022610/2010-0210_Final_Technical_Report.pdf). To achieve the goals at the shoreline, Responsible Agencies must implement strategies throughout the watershed.
12	Laura Hunter	Determining Priorities	"Our watershed is large and very diverse. The problems and challenges in Mesa Grande are very different from near Lake Hodges are different than Del Mar. At a bare minimum, there should be an additional priority, for each major section of the watershed and/or each co-permittee."	See response to comment #1 and #11.
13	Laura Hunter	Determining Priorities	"Felicitia Creek merits an enhanced effort as a result of this document. It is summer and kids spend a lot of time in Felicitia Park. Once in the park, they are drawn to Felicitia Creek. Most Sunday's I walk in the Park and see kids in, near, fishing from, swimming in Felicitia Creek. This is their right and it is what the Clean Water Act promises to them. The creek suffers from on-going VOCs from Chatham Waste site, exceedances of bacteria standards in the creek, nutrient pollution, and significant erosion. All of this is in violation of water board regulations."	Suspected impairment of Felicitia Creek due to VOCs has been added as a water quality condition in Appendix F.
14	Laura Hunter	Comment to Board	"I appreciate that Escondido has added collaboration on the water quality issues in Felicitia Creek as a strategy. However, as written, it appears to put the responsibility of convening such a meeting on the public. I request that the Water Board require the city and county commit to convene and develop as aggressive action plan to bring this heavily used creek up to standards. The WQIP should designate this high priority and polluted creek, a high priority for action."	Comment forwarded to the Regional Board.

#	Commenter	Category	Comment	Response to Comment
15	Laura Hunter	Additional Strategies	"SDGWQIP should PROHIBIT the sale and use of invasive plants. The WQIP only suggests that invasive plants should be 'avoided' in multi-use treatment areas. They should be prohibited everywhere. This is very important on many levels—including water quality. The problems of invasive plants and the huge expense they cause are well-known to local government. It is hard to understand why invasive Fountain Grass, Arundo and other horrific invasive plants continue to be allowed to be sold in local stores and then millions of dollars, usually of public money, must be spent removing them. Please use this document to prohibit the use and sale of invasive plants in our watershed."	See response to comment #4.
16	Laura Hunter	Additional Strategies	"SDGWQIP should require use of IPM to reduce herbicides, pesticides, and related water quality problems. SDGWQIP should require Integrated Pest Management (IPM) in residential development and by grounds maintenance done by HOAs or developers as conditions of approval. This could be an effective way to reduce these loads in stormwater."	Please see Appendix I. The City of San Diego added a strategy to reference IPM implementation program.
17	Laura Hunter	Additional Strategies	"SDGWQIP should require aggressive programs for retrofitting and new development to meet standards of xeriscaping, rain water harvesting, and water conservation. There are many hundreds of new homes proposed for construction in the San Dieguito Watershed. I worked closely with Escondido Neighbors United on the Oak Creek housing development process. Our experience was that Escondido in particular, will do only the barest minimum of standards of water conservation and stormwater runoff protection. In fact, we are convinced that the design of the storm water plans for the Oak Creek development are insufficient and a more protective plan was possible."	See response to comment #5 and #6. Additional strategies are included in each Responsible Agency's strategies table in Appendix I under Development Planning.
18	Laura Hunter	Additional Strategies	"In addition, much more can and should be required related to retrofitting existing development. This continues to be a huge deficiency in the WQIPs."	See response to comment #5.
19	Laura Hunter	Additional Strategies	"SDGWQIP Escondido needs strong additional strategies on enforcement. There is a repeated and troubling view of stormwater pollution, regulation, and enforcement in Escondido that the Board needs to consider in its decision-making. Watching the video recordings of the Escondido City Stormwater Workshops Escondido Council discussions of March 11, May 6, May 20 related to storm water regulations provide more than enough examples that a majority of the Escondido City Council is antagonistic to the permit's efforts to improve water quality in the region. Based on these many comments, there appears to be poor understanding of this issue and little interest to learn more about it."	City Council has consistently directed staff to comply with the municipal permit. They have also followed staff recommendations to approve resolutions and ordinances relating to the storm water program. This can be ascertained by viewing the recordings referenced in the comment. The fact that City Council members use this public forum to voice their concerns prior to approving staff recommendations and direct staff to comply with the permit should not invite additional attention from the RWQCB.
20	Laura Hunter	Comment to Board	"After hearing several Councilmembers repeat that they want to do the 'minimum' of what is required, I strong urge the Regional Board to bring the WQIP into compliance with the MS4 and require the strategies in the WQIP and raised by the public and to require a clear, pro-active, and demonstrable commitment to enforcement."	Comment noted.
21	Laura Hunter	Additional Strategies	"Specifically, the SDGWQIP should include strategies around an enforcement response plan such as County Strategy 13 which "requires and confirms" that BMPS are designed, constructed, and maintained. (compare to ES-4)4. This is the kind of language that should be infused throughout Escondido's strategies."	All residents and businesses are required to comply with the City of Escondido's stormwater requirements. The City of Escondido will be implementing an Enforcement Response Plan (ERP) developed in accordance with the municipal permit. This includes information on how violations of various stormwater requirements are addressed, including standards for escalated enforcement. The City of Escondido is committed to implement a new property-based/patrol inspection program in focus drainage areas in both Carlsbad and San Dieguito watersheds. This will inevitably lead to more outreach and enforcement action.

#	Commenter	Category	Comment	Response to Comment
22	Laura Hunter	Additional Strategies	"In addition, County Strategies 14—to enforce legal authority establish legal authority for all development projects to achieve compliance; 15-- Maintain and update a watershed-based inventory of all construction projects issued a local permit that allows ground disturbance or soil disturbing activities; and, 16-- to call out and focus on BMP inspections at an appropriate frequency and enforcement of requirements should also be included in Escondido strategies."	County Strategies 14, 15, and 16 are all addressed by the Escondido's JRMP and/or Enforcement Response Plan, in accordance with the requirements of the Permit.
23	Laura Hunter	Additional Strategies	"The SDGWQIP should also include clear enforcement authority over HOA's performance of maintenance of BMPs. Currently, the city does not have enforcement authority over the HOAs per recent responses to comments in the Oak Creek FEIR."	The City of Escondido maintains the legal authority to enforce the City of Escondido's ordinances and will continue to do so in accordance with the Enforcement Response Plan. The statement in the Oak Creek FEIR response to comments was in regards to the City's lack of authority/responsibility in enforcing Covenants, Conditions, and Restrictions (CC&Rs). The 2015 update of the ordinance governing Stormwaters and Wastewaters will add specific language on the maintenance of treatment control BMPs. The City of Escondido also includes maintenance requirements in conditions for approval for new developments.
24	Laura Hunter	Additional Strategies	"ES-5 Update the BMP manual actually does not include any language committing to BMP requirements are more stringent than they are now. We certainly don't want to see it updated, and weakened."	The Updated BMP Design Manual is being developed as a concurrent process with the WQIPs, and will be submitted to the Regional Board as late as December 2015. The update will be compliant with Permit Provisions E.3.a-d, which require more stringent BMP requirements, including expanding the definition of priority development projects and requiring all PDPs to implement LID BMPs to capture runoff from a 24-hour 85th percentile storm.
25	Laura Hunter	Additional Strategies	"Last, the severity of the drought highlights our need to increase requirements on new and existing development to capture rainwater, do more 'waterworks' to hold it on site, and implement water conservation actions. All of these should be reflected more strongly in these documents."	Strategies to address dry weather goals focus on reduction of irrigation runoff and water reuse as presented in individual Responsible Agencies' strategies tables and the WMA strategy to collaboratively target irrigation reduction (see Appendix I). Responsible Agencies' JRMP development planning programs also focus on treating and retaining water onsite where feasible.
26	Laura Hunter	Schedules -- Strategies	"Additional timelines should be added to SDGWQIP"	Appendix I was revised to replace all TBDs with schedules and timelines for strategies.
27	Laura Hunter	Additional Strategies	Timelines and triggers for required retrofits of trash areas should be enhanced. We know trash areas are a source, we should have a plan to address them. ES-8.5 does state when a trash area retrofit will be required, however it includes a loophole (voiding requirement for retrofit if improvement does not meet the retrofit cost) that should be closed.	Certain principles govern what Cities can require of permit applicants, firstly there needs to be a nexus between the subject action of the permit and the conditions being applied in the permit; and secondly, there needs to be proportionality in the cost of the permit action and the conditions of the permit. The current strategy allows for trash retrofits to be implemented where needed (such as the conversion of a unit to a restaurant), but does not require them where the permitted action is minor compared to the cost of the retrofit.
28	Laura Hunter	Additional Strategies	In addition, trash retrofits should be added as an upgrade requirement to ES-8 as the new minimum BMP. Many businesses may not do an improvement so would never be required to upgrade their trash BMPs. Part of the regular inspections by staff should assess the condition/management of the trash at a site and require a time schedule for upgrading.	The trash enclosure retrofit program is only applicable to businesses applying for change of use permits or other building permits. The reasons for this have been described in previous responses. The City of Escondido's commercial inspection program does assess trash areas and requires proper management of disposal areas in accordance with the municipal code.
29	Laura Hunter	Schedules -- Strategies	The timelines for the collaborative efforts around Felicita Creek and Lake Hodges should also be added. The County should be added to ES-24 and a timeframe given.	The City of Escondido has added a timeline for the Lake Hodges Collaborative study with the City of San Diego Public Utilities Department (FY17).
30	Laura Hunter	Triggers for optional strategies	SDGWQIP should show the path for activating optional strategies	Appendix I was revised, where needed, to add triggers or update existing triggers needed to implement optional strategies in the "Implementation Approach" column.
31	Laura Hunter	Triggers for optional strategies	Many of the County Optional strategies are excellent and should be required and would help us achieve water quality. The SDGWQIP should clearly state how 'optional' strategies can become 'active' strategies.	Each Responsible Agency's strategies table in Appendix I identifies triggers needed to implement the optional strategies in the "Implementation Approach" column. The triggers have been updated and more specificity has been added.

#	Commenter	Category	Comment	Response to Comment
32	Laura Hunter	Triggers for optional strategies	In the Escondido section, some of the good Optional strategies pursued (ES-31 and 32) will only be pursued if the very limited, narrow interim goals are not met. I strongly recommend that these strategies be given a timeline to be pursued within the scope of this permit. It is not understandable why we wouldn't want to pursue these actions now and secure clean water as soon as we can.	The City of Escondido is committing to a number of new strategies throughout both watersheds, and is committed to implementing those optional strategies as described in the WQIP. The City plans to focus mainly on Escondido Creek in the Carlsbad Watershed, consistent with the Municipal Permit's approach for focusing resources on priority areas.
33	San Diego Coastkeeper	Determining Priorities	"The WQIPs may not adequately consider data and public input for priority pollutants and conditions. To reiterate comments we made in June of 2014 (attached), section F.1.a.2. of the permit requires Copermittees to consider revisions to the priority water quality conditions based on recommendations from the Water Quality Improvement Consultation Panel. Yet, substantive revisions to the plans based on Panelist feedback often failed to take place, and where they did take place they were often minor in scope. There appear to have been relatively few instances where designations of Highest Priority Water Quality Conditions (HPWQCs) or Priority Water Quality Conditions (PWQCs) were amended or added following stakeholder input. This is the case even once sufficient data had been provided and concern had been expressed to Copermittees by the public and environmental stakeholders. This is problematic not only from a water quality perspective, but may be an indication that Copermittees did not adequately consider all relevant data in making their priority water quality condition determinations as required under permit sections B.2.a-d."	All data and water quality conditions provided by the public were considered (see Appendix D for public input on water quality conditions and data). In the case of water quality conditions where a data gap exists, the monitoring programs in the WQIP may provide more data.
34	San Diego Coastkeeper	Determining Priorities	"TMDL-focused priorities were overwhelmingly chosen across the WQIPs, though significant high priority conditions exist across the various sub-watersheds throughout our region that are not covered by TMDLs and for which strategies and schedules have not been developed."	See response to comment #1.
35	San Diego Coastkeeper	Determining Priorities	"...it remains unclear whether the selection of priority conditions and the methodologies used to establish HPWQCs and PWQCs were based on the review and analysis of legitimate data and public input, or if they instead were simply designated to fit conveniently into existing JURMP or TMDL requirements."	See response to comment #33.
36	San Diego Coastkeeper	Determining Priorities	"...in far too few cases were subwatersheds utilized as tools to address multiple highest priority conditions."	See responses to comment #1, #11 and #33.
37	San Diego Coastkeeper	Linking strategies to goals	The WQIPs fail to list numeric goals and strategies that address the highest priority water quality conditions by effectively prohibiting non-storm water discharges to the MS4, reduce pollutants in stormwater discharges from the MS4 to the MEP, and protect the water quality standards of receiving waters.	See response to comment #8.
38	San Diego Coastkeeper	Linking strategies to goals	"The numeric goals listed in several of the WQIPs fail to show how the chosen goals themselves will result in the achievement of water quality standards. Specifically, the numeric goals, "must be based on measurable criteria or indicators capable of demonstrating one or more of the following: (i) Discharges from the Copermittee's MS4s will not cause or contribute to exceedances of water quality standards in receiving waters, AND/OR (ii) The conditions of receiving waters and associated habitat are protected from MS4 discharges, AND/OR (iii) Beneficial uses of receiving waters are protected from MS4 discharges and will be supported. To a large degree the WQIPs fail to include sufficient goals to show that these requirements will be achieved. Many of the WQIPs contain goals, strategies, and schedules that are either unsupported by data or do not meet the requirements of the permit." Note: Examples of Carlsbad and Tijuana WMAs are provided.	See response to comment #8.

#	Commenter	Category	Comment	Response to Comment
39	San Diego Coastkeeper	Linking strategies to goals	"The WQIPs fail to demonstrate a link between chosen strategies and required outcomes. Equally important is the fact that the WQIPs fail to show how the chosen goals are based on reliable "measurable criteria" or "indicators capable of demonstrating" compliance with the permit. Numerous examples exist where chosen strategies incorporate educational undertakings, increased inspections, and other similar actions seen in previous iterations of the permit. And with each, there are no further details as to how taking those actions will necessarily result in the achievement of any of the three permit requirements in B3a(1)(a)." Note: Examples are provided of Tijuana and Carlsbad WMA, and their "overall lack of effort to link the strategies and the goals set".	In this WMA, goals have been developed based TMDL targets included in Attachment E of the Permit. See Appendix H, Identification of Goals, for further technical discussion on TMDL targets. The strategy tables in Appendix I have been updated to highlight the priority pollutants and sources that the strategies are intending to address.
40	San Diego Coastkeeper	Linking strategies to goals	"Similar to other WQIPs, the Los Penasquitos WQIP listed strategies but did not link them to the stated numerical goals.."	Section 4.3.2 of the WQIP provides the anticipated progress toward reaching goals. Strategies are grouped by category and provide estimated load reductions by category. The difficulty in providing a load reduction or other benefit by individual strategies, particularly nonstructural strategies, is discussed in Section 4.2. The adaptive management approach using annual assessments will drive accountability and updates to strategies as programs are implemented.
41	San Diego Coastkeeper	Linking strategies to goals	"In many ways, most of the jurisdictional programs and watershed programs (where they exist) simply mimic the type of largely non-structural JURMP strategies that have been implemented prior to the adoption of the 2013 permit. These non-structural strategies have dominated the approaches taken by Copermittees under previous plans and permits, and have largely proven to be ineffective at protecting receiving waters and beneficial uses from impairments caused by MS4 discharges. If the Copermittees consider these actions enough to meet the requirements of the permit, they must include more specific data to show how these strategies are linked to the required outcomes."	Section 4.3.2 provides the anticipated progress toward reaching goals. Appendix K, Strategy Selection and Compliance Analysis, provides additional detail on those benefit estimates. Appendix O includes a memo identifying the estimated benefit of the nonstructural strategies.
42	San Diego Coastkeeper	Triggers for optional strategies	"The WQIPs Fail to Incorporate All Required Strategies and Associated Data and Trigger Points."	Responsible Agencies' strategies have been updated in Appendix I. The triggers have been updated for optional strategies and more specificity has been added.
43	San Diego Coastkeeper	Additional Strategies	"The WQIPs Largely Fail to Consider Structural BMPs, Incentives, Retrofitting, Rehabilitation. Under the permit, potential strategies that may be implemented must include structural BMPs, incentives, and retrofitting, stream, channel, and/or habitat rehabilitation projects.4 It is exactly these types of BMPs Coastkeeper had hoped to see planned and implemented through the WQIPs and this permit. Instead, it appears as though most of the WQIPs fail to incorporate the structural BMPs, incentives, retrofitting projects, and/or stream, channel, and/or habitat rehabilitation strategies that section B.2.e. says must be included. Such strategies must be included as chosen strategies and/or optional strategies."	See response to comment # 40. The strategy selection process is discussed in Section 4.2. More efficient and cost-effective strategies will be implemented first and structural strategies will be triggered only if goals are not met in the future. Where structural strategies are likely needed, planning efforts and schedules to implement the strategies have been included. Other strategies targeting priority sources and pollutants will be implemented in the short-term (see Appendix I). The optional Alternative Compliance Program (WMAA) also identifies areas of existing development as candidates for retrofitting and rehabilitation. This program is currently being development by some Responsible Agencies. In addition, each Responsible Agency will be creating a program to identify areas to retrofit and rehabilitate streams, channels, and/or habitat in areas of existing development as part of each Responsible Agency's JRMP.
44	San Diego Coastkeeper	Watershed Strategies	"The WQIPs Fail to Include Adequate Watershed Management Strategies and Schedules. Our review found that many strategies are contained within jurisdictional actions rather than within watershed strategy actions. Under Section B.3.b. the permit makes clear that both jurisdictional and watershed management strategies must be devised, explained, and considered, and that the trigger points for implementing both strategies must be explained."	See section 4.2.5 for information on collaborative WMA strategies. Appendix I was revised to include information on WMA strategies in each Responsible Agency's strategies table.
45	San Diego Coastkeeper	Schedules -- Strategies	"Further, B.3.b. requires schedules for implementing both jurisdictional and watershed management strategies be devised. WQIPs that have failed to do so are not meeting the minimum requirements of the permit."	Strategies in Appendix I have been updated to include appropriate schedules.

#	Commenter	Category	Comment	Response to Comment
46	San Diego Coastkeeper	Public Strategies	"The WQIPs Fail To Incorporate All Suggested Optional Strategies, As Required. The MS4 permit states that, "Copermittees must include all the potential water quality improvement strategies identified by the public...with the submittal of the priority water quality conditions to the SD Water Board." Coastkeeper and other members of the public have, since the beginning of the WQIP process, asked for inclusion and consideration of various types of strategies. ⁶ Some of those strategies have been listed as optional in various WQIPs and some have not. Those that have been excluded must be included."	Appendix J was added to include Potential Water Quality Improvement Strategies. Optional strategies have been reevaluated and changes are reflected in Appendix I. Note, there's a difference between Potential Water Quality Improvement Strategies (Appendix J) and strategies selected by the Responsible Agencies to be implemented (Appendix I). Provision F.1.a.2.d of the Permit requires Responsible Agencies to include all <u>potential</u> water quality improvement strategies suggested by the public. All potential strategies suggested by the public have been included in Appendix J.
47	San Diego Coastkeeper	Triggers for optional strategies	"And, for each optional strategy the Copermittees are required under both the jurisdictional and the watershed plans to explain the circumstances necessary to trigger implementation of these plans."	Appendix I has been revised to update triggers and schedules..
48	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Creation of incentives and regulations for private to adopt and implement distributed and/or centralized BMPs throughout the watershed on private property."	These structural BMPs may be identified as part of Responsible Agencies' optional Alternative Compliance Program.
49	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Implementation of a Stormwater Utility, the purpose of which is to raise the necessary funding to implement stormwater plans and requirements. In instances where funding is inadequate, include a strategy to raise funding levels and appropriations toward compliance."	This strategy was included in the City of San Diego's strategy table in Appendix I.
50	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Increased enforcement against polluters and illicit dischargers. Where capacity or funding is an issue, include a strategy to increase funding and capacity to allow for additional enforcement."	See Appendix I. This strategy is included for several Responsible Agencies.
51	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Strategies must include additional regulation and/or enforcement of MS4 and non-MS4 sources of pollutants in water bodies. Examples to be included are (a) the regulation of sites that may be contributors to pollutants in the MS4 system, (b) regulation of non-MS4 activities that ultimately impact the MS4 or receiving waters, and (c) regulation of non-compatible uses or practices within a jurisdiction to help eliminate MS4 pollutant sources. Such potential strategies regulation or protocols must include: land use regulations/amendments; development moratoriums; zoning amendments; irrigation scheduling, management, and BMPs; pesticide application regulations and prohibitions; regulations requiring and incentivizing distributed BMPs and requiring maintenance of distributed BMPs, and increased overall enforcement."	See Appendix I and Section 4.2.5. These strategies have been included in many Responsible Agencies' strategies table and as WMA collaborative strategies.
52	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Green infrastructure projects that serve as jurisdictional compliance BMPs, and that may also serve concurrently as Alternative Compliance BMPs. An example might be a constructed wetland or stream rehabilitation, implemented by a Copermittee towards compliance, the scope of which may be broadened in conjunction or partnership with an Alternative Compliance project that absolutely ensures operations and maintenance in perpetuity, perhaps through an endowment or trust."	See Appendix I. This type of strategy is currently being considered by some Responsible Agencies through development of their optional Alternative Compliance Program.
53	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Any and all green infrastructure or "multi-use treatment area" BMPs for which there exists current data on effectiveness. At a minimum these must include: "green streets", bioretention, infiltration, swales, rain gardens, downspout disconnections, green roofs, rainwater harvesting, porous pavements, wetlands, and land conservation."	These types of strategies have been considered and are included in Section 4.2. Some Responsible Agencies have included some of these strategies in their strategies table in Appendix I.
54	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Partnerships and information sharing with NGOs (including San Diego Coastkeeper) and the Board towards enforcement actions against polluters/illicit dischargers impairing receiving waters."	See Section 4.2.5 and Appendix I. Collaboration with the Regional Board and Participation in San Diego Integrated Regional Water Management Program are included as WMA strategies. Where known, partnering agencies are identified.
55	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Capture and use of stormwater to augment imported water supplies and to reduce flows in the MS4."	See Appendix I. This strategy is included for several Responsible Agencies and is a key strategy to address dry weather goals.

#	Commenter	Category	Comment	Response to Comment
56	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Stream, channel, habitat, and wetlands restoration and other projects that restore both physical stream channel conditions and lost ecosystem services, and that have the potential to provide multiple water quality and societal and recreational benefits."	See Appendix I. This strategy is included for several Responsible Agencies. This is also a JRMP program requirement for all Responsible Agencies.
57	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Implementation of BMPs with multiple benefits in addition to improved water quality, such as those benefiting public health, habitat creation, waters supply augmentation, and additional recreational activities."	See Section 4.2. Responsible Agencies considered multiple benefits when selecting their strategies, including the ability to improve water quality.
58	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Strengthening of Jurisdictional Runoff Management Programs and implementation."	See Appendix I. Implementation approaches and enhancements to JRMP programs are identified in Responsible Agencies' strategies tables.
59	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Strategies that address multiple PWQCs to a significant degree"	See Section 4.2. Strategies with multiple benefits are prioritized. Appendix I was also revised to show strategies' multi-pollutant benefits.
60	San Diego Coastkeeper	Additional Strategies	Suggested Strategy: "Strategies to maintain open space and natural functions"	See Appendix I. This strategy is included for several Responsible Agencies.
61	San Diego Coastkeeper	Public Strategies	"Any and all additional strategies that were suggested by members of the environmental community must be included as well as analyzed to determine the list the circumstances necessary to trigger their implementation. As the business-as-usual approach has largely failed to address stormwater pollution, each of these strategies must be implemented immediately, as existing conditions warrant their immediate application."	See response to comment #46. For optional strategies selected Responsible Agencies have updated triggers needed (see Appendix I).
62	San Diego Coastkeeper	Comment to Board	"Coastkeeper respectfully requests that, upon receipt of these comments, the Board ensure Copermittees include all strategies (with associated triggers explanations) that have been recommended but not yet included so the totality of strategies are not prematurely narrowed."	See response to comment #46 and #61.
63	San Diego Coastkeeper	Triggers for optional strategies	"The WQIPs fail to include circumstances under which such strategies would be implemented. Under Section B.3.b.(1)(b), Copermittees must include optional strategies that will be implemented, as necessary, and they must include (v), "the circumstances necessary to trigger implementation of the optional jurisdictional strategies". The Watershed Management Area Strategies contain similar language requiring an identification of such strategies and the circumstances necessary to trigger these strategies." "As the Copermittees are required to not only list the strategies but the trigger points for implementation, any WQIPs that fail to contain both of these requirements do not comply with even the minimum requirements the permit."	See Appendix I. The triggers have been updated and more specificity has been added.
64	San Diego Coastkeeper	Triggers for optional strategies	"Coastkeeper's review found that Los Penasquitos and San Luis Rey were the only WQIPs to demonstrate triggers, with Los Penasquitos providing more information than San Luis Rey. For example, one San Luis Rey optional strategy was to consider dry weather flow diversions or other small-scale LID structural BMPs to mitigate dry weather flows, and the corresponding trigger is listed as, "progress towards interim or final dry weather goals is not significant and watershed analysis indicates the need for additional BMPs to attain the final goals, dry weather diversions may be considered where funding is available." This language is vague and arbitrary and shows a lack of commitment to provide a meaningful expectation as to when the optional strategy might be implemented. Still other WQIPs largely failed to include the trigger points altogether, or contained equally vague language, rendering them useless for any meaningful execution."	See Appendix I. The triggers have been updated and more specificity has been added to the optional strategies.

#	Commenter	Category	Comment	Response to Comment
65	San Diego Coastkeeper	Schedules -- Goals	"The WQIPs Fail to Comply With Schedule Requirements: The permit states that schedules for achieving numeric goals, "must be as soon as possible", and must reflect the "shortest practicable time" to achieve the asserted goals.9 Yet, Coastkeeper has found little to support the timelines present for achieving the goals (some of which do not even comply with the requirements of the permit or CWA), or whether these timelines could be expedited." Note: An example of the Carlsbad WMA's failure to eliminate 100% of dry weather flow within a reasonable timeline is provided."	In this WMA, goals have been developed based TMDL targets included in Attachment E of the Permit. TMDL targets represent the shortest practicable time frame. Using the adaptive management process, schedules will be reevaluated as progress is tracked and assessed.
66	San Diego Coastkeeper	Other Documents -- WMAA	"We understand several Copermittees that have incorporated the WMAA region-wide analysis into their WQIPs have not updated the analysis with watershed-specific data. To that extent, we believe our comments submitted on the region-wide analysis are still relevant. As such, those comments are attached."	The region-wide analysis has been attached to the Water Quality Improvement Plans. No additional updates through the Water Quality Improvement Plan process have been made to date. Watershed-specific analysis will be completed by Responsible Agencies. Details will be made available Responsible Agencies develop their optional Alternative Compliance Program.
67	San Diego Coastkeeper	Comment to Board	"Coastkeeper requests that the Board require each Copermittee to choose numeric goals and strategies that will be capable of showing real progress towards meeting the end goals stated in the permit. These would most likely include measurable criteria with a proven link to outcomes that comply with the permit's requirements. The best, most effective way to meet this requirement would be to measure the levels of pollutants or conditions over time and establish targets on expedited timeframes for achieving each interim and final goal that actually will meet WQSS. Those actions alone will bring the Copermittees into compliance with the MS4 permit and the Clean Water Act."	Comment noted.
68	Torrent Resources	Other Documents -- BMP Design Manual Update	"Conspicuously absent is a fact sheet for a drywell, which was previously included in the City of San Diego Storm Water Standards Manual, dated January 20, 2012, as well as in the County of San Diego SUSMP revised edition, dated August 1, 2012. Table 1 below identifies the page, paragraph, and context of each mention of drywell or dry well within these 2 documents." Note: A table is included as noted. "Given that drywells are also used in dozens of other California cities and counties, we strongly recommend the inclusion of an additional BMP Design Fact Sheet for non-proprietary drywells, perhaps INF-4. In many areas across San Diego, the surface soils are very consolidated and often impermeable, which makes surface infiltration infeasible. However, it is our experience that in San Diego and surrounding areas the underlying soils are, in fact, highly permeable. The benefits of including drywells in the Model BMP Design Manual include higher performance from on-site retention facilities, reduction in downstream flooding and erosion, and increased recharge of underlying groundwater aquifers."	The BMP Design Manual is being developed by Responsible Agencies as a concurrent process with the WQIPs, and will be submitted to the Regional Board no later than December 2015.

#	Commenter	Category	Comment	Response to Comment
69	Tory R. Walker Engineering	Other Documents -- HMP	<p>"This letter is being submitted alongside a detailed statistical hydrology report conducted by Tory R. Walker Engineering (TRWE). The study employs a detailed statistical hydrologic modeling approach and has gained the approval of TRWE's hydrologic modeling experts and two respected university professors."</p> <p>"The study has two major conclusions. First, the study concludes that the existing river impoundments have a more significant effect on overall watershed hydrology than any proposed land development downstream of the impoundments. Secondly, the study's hydrologic continuous simulation modeling further concludes that reinstatement of the HMP exemptions for directly-discharging PDPs has a very minor and insignificant influence on the 2-year through 10-year peak flows within these river reaches. These findings agree with the initial hydromodification management BMP exemption criteria proposed by the 2011 HMP Technical Advisory Committee. Therefore, we believe it is appropriate to reinstate the 2011 HMP exemptions based upon this confirmation."</p>	Comment noted.
70	Surfrider Foundation	General Comment	We articulated concerns in 2013, asking that the WQIP review process be staggered for the different watershed in order to facilitate proper review and engagement. Unfortunately, that is not the case, and as such we have not been able to review each of the eight plans in detail.	The WQIP review timeline is established in the Permit.
71	Surfrider Foundation	General Comment	In general, while the eight WQIPs are very lengthy, they lack commitment and detail. As written, Surfrider is concerned that the WQIPs do not live up to their intent in the MS4 permit and will not actually accomplish clean water. Many of the water bodies in our region have not met the standards of the Clean Water Act under the previous stormwater management paradigm, and with the proposed WQIPs we do not believe we will achieve those standards with this new watershed approach. Unfortunately, at this point the WQIPs very much appear to be more of the same or "business as usual" by the copermittees.	Comment noted.
72	Surfrider Foundation	Linking strategies to goals	The WQIPs fail to list numeric goals and strategies that address the highest priority pollutants. Furthermore, the WQIPs fail to demonstrate the necessary link between the chosen strategies and required outcomes in water quality conditions.	In this WMA, goals have been developed based on TMDL targets included in Attachment E of the Permit. See goals appendices for further technical discussion on TMDL targets. The strategy tables in Appendix I have been updated to highlight the priority pollutants and sources that the strategies are intending to address and to highlight the link between strategies, sources, and pollutants.
73	Surfrider Foundation	Schedules -- Goals	Goal: "reduce bacteria levels at Pacific Shoreline near Torrey Pines State Beach by 2031 for wet weather" Comment: That seems a long way out. Can this be done sooner?	This comment does not apply to San Dieguito.
74	Surfrider Foundation	Additional Strategies	Strategies and Schedules: Comments: *Include city workers in education programs (We've seen piles of clippings left in gutter after city crew mowed park) *Strengthen education and enforcement of public use of parks/open spaces. e.g.. hikers and bikers need to stay on trail so don't degrade habitat and cause erosion. This might require more Rangers.	This comment does not apply to San Dieguito.
75	Surfrider Foundation	Additional Strategies	Jurisdiction and Responsibilities: Copermittees don't have jurisdiction over some areas like transit district, UCSD, MCAS Miramar. Plan to study potential discharges and investigate/meet. Comment: Is there a schedule/deadlines to have meetings and address these potentially important discharge sources?	This comment does not apply to San Dieguito.
76	Surfrider Foundation	Determining Priorities	Los Penasquitos WMA TMDLs: Lots of TMDL 'to be developed'. Comment: Can't we at least set upper maximum based on current standards?	This comment does not apply to San Dieguito.
77	Surfrider Foundation	Monitoring/Determining Priorities	Los Penasquitos WMA NPDES Monitoring Stations: Comment: Only 3 monitoring stations in the whole watershed is not enough. Need stations in Carmel Valley Creek and Carroll Canyon and another station in Los Penasquitos (probably midway between existing stations) to assess impact of urban development.	This comment does not apply to San Dieguito.

#	Commenter	Category	Comment	Response to Comment
78	Surfrider Foundation	Determining Priorities	Determine Potential Receiving Water Impacts from MS4 Discharges: "(6) Potential Improvements in the quality of discharges from the MS4 that can be achieved": Comment: This is confusing. The potential receiving water impact is there whether we can improve it or not. And what does 'can be achieved' mean? The knowledge and technology exist to remove pollutants.	This comment does not apply to San Dieguito.
79	Surfrider Foundation	Determining Priorities	Priority Water Quality Condition Data Gaps: "MS4 data collected on the subwatershed level do not directly link the outfall discharges with impairment." Comment: We need more water monitoring stations to determine if there is a link. "groundwater may be a contributing source" Comment: What is the plan to figure this out? Otherwise it is convenient to blame groundwater.	This comment does not apply to San Dieguito.
80	Surfrider Foundation	Sources	Highest Priority Water Quality Conditions Source Identification Process: Comment: Natural sources are given low priority. But if we improve the ecosystem health of open spaces then they can act as filters for both natural and human sources. For example, protecting stream vegetation and wetlands (not just at the lagoon) along Los Penasquitos creek can improve filtering capacity/removal of all pollutants.	This comment does not apply to San Dieguito.
81	Surfrider Foundation	Sources	Source Controllability: "Sources of stressors that are not controllable include: Discharges from open spaces and undeveloped land" Comment: Properly protected/restored open space will have less harmful discharge. So this is a source that can be controlled to some extent.	This comment does not apply to San Dieguito.
82	Surfrider Foundation	Numeric Goals	"Wet Weather Sediment Final Numeric Goals: Comment: This applies to the city of Del Mar, Poway, and San Diego. The "increasing trend in salt marsh" and "reasonable assurance of compliance" is vague. Need more specific goals with step-by-step progress."	This comment does not apply to San Dieguito.
83	Surfrider Foundation	Schedules -- Goals	"Wet Weather Bacteria Numeric Goals: Comment: Not ambitious enough. Even by 2035 will still have a lot of days exceeding WQO."	This comment does not apply to San Dieguito.
84	Surfrider Foundation	Numeric Goals	"Dry Weather Numeric Goals for County of San Diego Comment: The "routine observations" and "effective elimination of anthropogenic dry weather flows" seems like a really good approach that should be implemented by all copermittees, not just the County."	Several Responsible Agencies include similar performance goals in Section 4 to effectively eliminate dry weather flows. In addition, routine investigations are required as part of the monitoring program
85	Surfrider Foundation	Comment to Board	"In conclusion, we feel that the WQIPs as proposed largely fail to meet the intent and requirements of the MS4 stormwater permit. It is our hope that the Regional Board will hold the copermittees accountable and demand more than just the proposed business as usual."	Comment noted.
86	Regional Board	General Comment	"However, not all proposed priorities, goals, and schedules will be determined acceptable, especially if the San Diego Water Board determines that a Plan will not achieve water quality improvements within a reasonable period of time. While the elements of a Plan may meet the requirements of the Order, those elements must also meet the intent of the Order which is instrumental to achieving the goals of the San Diego Water Board's Practical Vision."	Comment noted.
87	Regional Board	Determining Priorities	Issue of Concern: "a) In several Plans, the San Diego Water Board did not find a fully inclusive list of all priority water quality conditions (i.e. pollutants, stressors, receiving water conditions) that should have been identified in data and information that were required to be considered pursuant to Provisions B.2.a and B.2.b. Pursuant to Provision B.2.c.(1), a fully inclusive list was required to be evaluated to identify which of those conditions were the highest threat to receiving water quality, or most adversely affect the quality of receiving waters."	This comment does not apply to San Dieguito.
88	Regional Board	Determining Priorities	Issue of Concern: "b) In at least one Plan, there was not enough description or information that allowed the San Diego Water Board to determine if all the factors under Provisions B.2.a and B.2.b were adequately considered or not."	This comment does not apply to San Dieguito.

#	Commenter	Category	Comment	Response to Comment
89	Regional Board	Determining Priorities	Issue of Concern: "c) A few Plans have identified bacteria as a highest priority water quality condition based on the Revised Total Maximum Daily Loads (TMDLs) for Indicator Bacteria, Project I – Twenty Beaches and Creek in the San Diego Region (Beaches and Creeks Bacteria TMDLs), but the segment which the highest priority water quality condition is based on is no longer identified as impaired on the Clean Water Act Section 303(d) List (303(d) List)."	Although the beach segment has been delisted from the 303(d) list the beach segment remains in the TMDL and Attachment E of the Permit. The WQIP was revised to further clarify that, if it is demonstrated through monitoring the current highest priority condition is no longer an issue, the WQIP will be modified to identify new highest priority water quality conditions.
90	Regional Board	Determining Priorities	"Noncompliant Priority Water Quality Conditions: In several Plans, there was a notable absence of one or more pollutants or conditions of concern known to the San Diego Water Board (e.g. trash, hydromodification, benthic alteration, stream or riparian habitat degradation) that were also identified in reports, plans, and data cited and reviewed by the Copermittees (e.g. 2011 Long Term Effectiveness Assessment). In a few Plans, there was also a notable absence of pollutants or conditions of concern identified by the public at workshops or Water Quality Improvement Plan Consultation Panel meetings, and in written comments from stakeholders and the public. The lists developed pursuant to Provision B.2.c.(1) that do not acknowledge and include these notably absent pollutants and conditions of concern are not in compliance with the requirements of Provisions B.2.a-c."	This comment does not apply to San Dieguito.
91	Regional Board	Determining Priorities	"Unacceptable Priority Water Quality Conditions: A few Plans have bacteria as a highest priority water quality condition only because of the Beaches and Creeks Bacteria TMDLs, but there is no longer an impairment identified on the 303(d) List. If there are no strategies proposed to be implemented other than the requirements of Provisions E.2 through E.7 to address bacteria, or there are no load reductions quantified for other pollutants in addition to bacteria, or both, the Plans are not acceptable to the San Diego Water Board."	The San Dieguito River WQIP was revised to include Table 4-18, which quantifies load reductions for multiple pollutants in addition to bacteria. The WQIP was revised to further clarify that if it is demonstrated through monitoring the current highest priority condition is no longer an issue, the WQIP will be modified to identify new highest priority water quality conditions.
92	Regional Board	Numeric Goals	Issue of Concern: "a) Several Plans include proposed final numeric goals expressed in a manner that is difficult for the San Diego Water Board to determine the final numeric goal is a criterion or indicator capable of demonstrating one or more of the criteria given in Provisions B.3.a.(1)(a)(i)-(iii). In addition, the San Diego Water Board questions how some of these proposed final numeric goals could be measured by the Copermittees."	This comment does not apply to San Dieguito. However, for clarification the following text was added to Section 4.1.: "TMDL targets interpret the existing water quality standards. Water quality standards include beneficial uses, water quality objectives (WQOs) that are established at levels sufficient to protect those beneficial uses, and an antidegradation policy to prevent degrading waters that are better than the quality established as WQOs (Regional Board 2010). Therefore, using the TMDL targets and compliance pathways as Water Quality Improvement Plan goals provides a direct connection to protecting the beneficial uses identified in the highest priority water quality condition." Measurement of the goals is presented in Section 5, Table 5-1. Responsible Agencies are currently identifying specific datasets that will be used to show progress towards meeting the interim and final goals.
93	Regional Board	Numeric Goals	Issue of Concern: "b) Several proposed final numeric goals appear to be in conflict with the prohibitions and limitations in Provision A of the Order. For example, there are Plans with proposed final numeric goals associated with reducing non-storm water discharges from the MS4s, but the San Diego Water Board cannot determine how achievement of the proposed final numeric goal is in compliance with the requirement to effectively prohibit non-storm water discharges to the MS4 (Provision A.1.b)."	See response to comment #92.

#	Commenter	Category	Comment	Response to Comment
94	Regional Board	Numeric Goals	Issue of Concern: "c) There are proposed final numeric goals that are difficult for the San Diego Water Board to establish a link between achieving the final numeric goal and addressing the highest priority water quality condition. For example, there are Plans with proposed final numeric goals associated with reducing non-storm water discharges from the MS4s to achieve reductions of pollutants in MS4 discharges (e.g. bacteria) during wet weather and dry weather conditions; however, the MS4 discharge reduction metric (e.g. flow) does not quantify the pollutant reduction that will be achieved during wet weather or dry weather conditions."	This comment does not apply to San Dieguito. Goals are reflective of TMDL targets.
95	Regional Board	Numeric Goals	Issue of Concern: "d) Some proposed final numeric goals did not meet the criteria of Provision B.3.a.(1)(a), but could be acceptable interim numeric goals."	This comment does not apply to San Dieguito. TMDL goals meet the criteria of B.3.a.(1)(a)
96	Regional Board	Numeric Goals	"Noncompliant Final Numeric Goals: Final numeric goals that are not numeric, AND measureable, AND capable of demonstrating the Copermittees' MS4s will not cause or contribute to exceedances of receiving water limitations, or the receiving waters are protected from the Copermittees' MS4 discharges, or both, are not in compliance with the requirements of Provision B.3.a.(1)(a)."	This was not an issue in San Dieguito. TMDL goals meet the criteria of B.3.a.(1)(a)
97	Regional Board	Numeric Goals	Unacceptable Final Numeric Goal: "a) Final numeric goals that are not consistent or do not demonstrate compliance with the prohibitions and limitations of the Provision A."	This comment does not apply to San Dieguito. TMDL goals meet the criteria of B.3.a.(1)(a)
98	Regional Board	Numeric Goals	Unacceptable Final Numeric Goal: "b) Final numeric goals with a metric that is unclear about how it will be measured, and lacks any description of, or reference to the data that will be collected to measure the metric."	This comment does not apply to San Dieguito. TMDL goals meet the criteria of B.3.a.(1)(a)
99	Regional Board	Numeric Goals	Unacceptable Final Numeric Goal: "c) Final numeric goals that do not clearly demonstrate achievement of the final numeric goal will result in MS4 discharges that do not cause or contribute to exceedances of water quality standards in receiving waters, or the receiving waters are protected from the Copermittees' MS4 discharges, or both."	This comment does not apply to San Dieguito. TMDL goals meet the criteria of B.3.a.(1)(a)
100	Regional Board	Numeric Goals	Unacceptable Final Numeric Goal: "d) Final numeric goals that do not have a metric that clearly demonstrates a link to addressing the highest priority water quality conditions."	This comment does not apply to San Dieguito. TMDL goals meet the criteria of B.3.a.(1)(a)
101	Regional Board	Numeric Goals	"Issues of Concern: In at least one Plan, the San Diego Water Board has found proposed final numeric goals that do not have interim numeric goals that are expressed in the same or similar metric as the final numeric goals."	This comment does not apply to San Dieguito. Interim goals are expressed in a similar manner as final goals.
102	Regional Board	Numeric Goals	"Noncompliant Interim Numeric Goals: Final numeric goals that do not have at least one interim numeric goal expressed as a reasonable increment in the same or similar metric as the final numeric goal are not in compliance with Provision B.3.a.(1)(b)(ii)."	This comment does not apply to San Dieguito. Interim goals are expressed in a similar manner as final goals.
103	Regional Board	Potential Strategies	Issue of Concern: "a) In at least one Plan, the San Diego Water Board was not able to locate the list of potential water quality improvement strategies developed during the public participation process in the Plan."	Potential Water Quality Improvement Strategies document was included as Appendix J. This includes any new strategies provided by the public/Consultation Panel that were not covered under the existing list of potential strategies.
104	Regional Board	Potential Strategies	Issue of Concern: "b) In at least one Plan, the San Diego Water Board could not find all the potential water quality improvement strategies suggested or recommended in public comments."	Potential Water Quality Improvement Strategies document was included as Appendix J. This includes any new strategies provided by the public/Consultation Panel that were not covered under the existing list of potential strategies.
105	Regional Board	Potential Strategies	"Noncompliant Potential Water Quality Improvement Strategies: Plans that do not identify all potential strategies that were considered for implementation to improve water quality are not in compliance with the requirements of Provision B.2.e. Plans that did not consider all the potential water quality improvement strategies submitted in public comments are also not in compliance with the requirements of Provision B.2.e."	Potential Water Quality Improvement Strategies document was included as Appendix J. This includes any new strategies provided by the public/Consultation Panel that were not covered under the existing list of potential strategies.

#	Commenter	Category	Comment	Response to Comment
106	Regional Board	Optional Strategies	Issue of Concern: "a) Several Copermittees did not include any proposed optional jurisdictional strategies to be implemented within their jurisdictions, as necessary, to effectively prohibit non-storm water discharges to the MS4, reduce pollutants in storm water discharges from the MS4 to the maximum extent practicable (MEP), protect beneficial uses of receiving waters from MS4 discharges, or achieve proposed interim and final numeric goals."	See Appendix I. Strategies have been updated to include the necessary information.
107	Regional Board	Optional Strategies	Issue of Concern: "b) Most Copermittees did not include an incentive or program to encourage or implement projects to retrofit areas of existing development within its jurisdiction. Pursuant to Provision E.5.e.(1)(a), every Copermittee is required to identify areas of existing development within its jurisdiction as candidates for retrofitting. Therefore, every Copermittee should have some incentive or program to encourage implementation of retrofit projects in the areas of existing development identified in its JRMP document pursuant to Provision E.5.e.(1)(a), unless there is an acceptable rationale in the Plan describing why it is infeasible to encourage or implement such retrofit projects."	See Appendix I. Text and strategies have been updated. An additional reference to the Alternative Compliance Program (WMAA) was also included.
108	Regional Board	Optional Strategies	Issue of Concern: "c) Most Copermittees did not include an incentive or program to encourage or implement projects that will rehabilitate the conditions of channels or habitats within its jurisdiction. Pursuant to Provision E.5.e.(2)(a), every Copermittee is required to identify streams, channels, and/or habitats in areas of existing development within its jurisdiction as candidates for rehabilitation. Therefore, every Copermittee should have some incentive or program to encourage implementation of projects to rehabilitate the conditions of channels or habitats within its jurisdiction identified in JRMP document pursuant to Provision E.5.e.(2)(a), unless there is an acceptable rationale in the Plan describing why it is infeasible to encourage or implement such rehabilitation projects."	See Appendix I. Text and strategies have been updated. An additional reference to the Alternative Compliance Program (WMAA) was also included.
109	Regional Board	Optional Strategies	Issue of Concern: "d) Of the Copermittees that did include proposed optional jurisdictional strategies, adequate information about the funds and/or resources needed to implement the strategy (e.g. plans to be developed, studies to be conducted, data to be collected, personnel needed, equipment needed, administrative structures required, contracts needed, land to be acquired, etc.) was not provided."	See Appendix I. Strategies have been updated to include the necessary information and with more specificity for funds and resources.
110	Regional Board	Optional Strategies	Issue of Concern: "e) Of the Copermittees that did include proposed optional jurisdictional strategies, adequate information about the circumstances necessary to trigger implementation of the strategy (e.g. funding availability, obtain approval from city councils, findings from assessments or studies, etc.) was not provided."	See Appendix I. Strategies have been updated to include the necessary information and with more specificity for triggering implementation.
111	Regional Board	Optional Strategies	Issue of Concern: "f) Many proposed optional jurisdictional strategies did not appear to be a BMP, an incentive, or a program that could be implemented to effectively prohibit nonstorm water discharges to the MS4, reduce pollutants in storm water discharges from the MS4 to the MEP, protect beneficial uses of receiving waters from MS4 discharges, or achieve proposed interim and final numeric goals. Implementation of an optional jurisdictional strategy is expected to result in an improvement of water quality."	See Appendix I. Strategies have been updated to include the necessary information and with more specificity.
112	Regional Board	Optional Strategies	Noncompliant Optional Jurisdictional Strategy: "a) A Copermittee that did not propose any optional jurisdictional strategies to be implemented within its jurisdiction, as necessary, to effectively prohibit non-storm water discharges to the MS4, reduce pollutants in storm water discharges from the MS4 to the MEP, protect beneficial uses of receiving waters from MS4 discharges, or achieve proposed interim and final numeric goals, in addition to the BMP implementation, inspection, enforcement, and education activities that are already required by Provisions E.2 through E.7 is not in compliance with the requirements of Provision B.3.b.(1)(b)(i)."	See Appendix I. Where needed, strategies were updated.

#	Commenter	Category	Comment	Response to Comment
113	Regional Board	Optional Strategies	Noncompliant Optional Jurisdictional Strategy: "b) Unless acceptable data or rationale are provided in the Plan, a Copermittee that did not propose any incentives or programs to encourage or implement projects to retrofit areas of existing development within its jurisdiction as optional jurisdictional strategies is not in compliance with the requirements of Provision B.3.b.(1)(b)(ii). A Copermittee that has not identified areas of existing development within its jurisdiction as candidates for retrofitting in its JRMP document also is not in compliance with Provision E.5.e.(1)(a), unless acceptable data or rationale is provided."	See Appendix I. Strategies have been updated and include a reference to the Alternative Compliance Program (WMAA).
114	Regional Board	Optional Strategies	Noncompliant Optional Jurisdictional Strategy: "c) Unless acceptable data or rationale are provided in the Plan, a Copermittee that did not propose any incentives or programs to encourage or implement projects to rehabilitate channels or habitats within its jurisdiction as optional jurisdictional strategies is not in compliance with the requirements of Provision B.3.b.(1)(b)(iii). A Copermittee that has not identified projects to rehabilitate the conditions of channels or habitats within its jurisdiction in its JRMP document also is not in compliance with Provision E.5.e.(2)(a), unless acceptable data or rationale are provided."	See Appendix I. Strategies have been updated and include a reference to the Alternative Compliance Program (WMAA).
115	Regional Board	Optional Strategies	Noncompliant Optional Jurisdictional Strategy: "d) A Copermittee that does not have any optional jurisdictional strategies in the Plan or has proposed an optional jurisdictional strategy without an adequate description of the funds and/or resources needed to implement the strategy is not in compliance with the requirements of Provision B.3.b.(1)(b)(iv)."	See Appendix I. Strategies have been updated to include the necessary information and with more specificity for funds and resources.
116	Regional Board	Optional Strategies	Noncompliant Optional Jurisdictional Strategy: "e) A Copermittee that does not have any optional jurisdictional strategies in the Plan or has proposed an optional jurisdictional strategy without an adequate description of the circumstances needed to trigger implementation of the strategy is not in compliance with the requirements of Provision B.3.b.(1)(b)(v)."	See Appendix I. Strategies have been updated to include the necessary information and with more specificity for triggers.
117	Regional Board	Optional Strategies	Unacceptable Optional Jurisdictional Strategy: "a) Many proposed optional jurisdictional strategies are described using terms such as "consider", "evaluate", "investigate", or "develop" a BMP, incentive, or program. These terms indicate to the San Diego Water Board that the Copermittee is only preparing for the implementation of a BMP, incentive, or program. Provision B.3.b.(1)(b) requires each Copermittee identify that optional jurisdictional strategies that will be implemented. Preparation for a strategy does not meet the requirement of a strategy that will be implemented."	See Appendix I. Strategies have been updated to include the necessary information.
118	Regional Board	Optional Strategies	Unacceptable Optional Jurisdictional Strategy: "b) Many proposed optional jurisdictional strategies describe development of a plan, conducting a special study or an assessment, or collecting data. Plans, special studies, assessments, and data collection are necessary steps to implement a strategy, but are not in and of themselves a strategy that will result in the effective prohibition of non-storm water discharges to the MS4, reduction of pollutants in storm water discharges from the MS4 to the MEP, protection of beneficial uses of receiving waters from MS4 discharges, or achievement of proposed interim and final numeric goals."	See Appendix I. Strategies that included plans, special studies, assessments, and data collection were retained in the strategies tables. However, strategies tables were revised to ensure all Responsible Agencies have at least 2 optional strategies that will result in effective water quality improvement. These optional strategies have been updated to include all the necessary information required by the Permit.
119	Regional Board	Optional Strategies	Unacceptable Optional Jurisdictional Strategy: "c) Several proposed optional jurisdictional strategies appear to be BMP implementation, inspection, enforcement, and education activities that are already being implemented or required to be implemented by the Copermittee pursuant to Provisions E.2 through E.7. Optional jurisdictional strategies are required in addition to the requirements of Provisions E.2 through E.7."	See Appendix I. Strategies have been re-categorized, where needed.
120	Regional Board	WMA Strategies	"Issues of Concern: All the Plans lacked enough information about Watershed Management Area strategies to meet the requirements of Provision B.3.b.(2)."	See Appendix I and Section 4.2.5. WMA strategies have been updated to include more specificity.

#	Commenter	Category	Comment	Response to Comment
121	Regional Board	WMA Strategies	Noncompliant Watershed Management Area Strategies: "a) A Plan that did not propose any Watershed Management Area strategies to be implemented on a regional or multi-jurisdictional scale, as necessary, to effectively prohibit non-storm water discharges to the MS4, reduce pollutants in storm water discharges from the MS4 to the MEP, protect beneficial uses of receiving waters from MS4 discharges, or achieve proposed interim and final numeric goals is not in compliance with the requirements of Provision B.3.b.(2)(a)."	See Appendix I and Section 4.2.5. WMA strategies have been updated to include more specificity. Several MWA strategies are being implemented by various Responsible Agencies.
122	Regional Board	WMA Strategies	Noncompliant Watershed Management Area Strategies: "b) Unless acceptable data or rationale are provided in the Plan, a Plan that did not propose any incentives or programs to encourage or implement projects to retrofit areas of existing development as a Watershed Management Area strategy is not in compliance with the requirements of Provision B.3.b.(2)(b)."	Text in Section 4.2.5 and strategies in Appendix I have been updated and a reference to the Alternative Compliance Program (WMAA) was included.
123	Regional Board	WMA Strategies	Noncompliant Watershed Management Area Strategies: "c) Unless acceptable data or rationale are provided in the Plan, a Plan that did not propose any incentives or programs to encourage or implement projects to rehabilitate channels, streams, or habitats as a Watershed Management Area strategy is not in compliance with the requirements of Provision B.3.b.(2)(c)."	Text in Section 4.2.5 and strategies in Appendix I have been updated and a reference to the Alternative Compliance Program (WMAA) was included.
124	Regional Board	WMA Strategies	Noncompliant Watershed Management Area Strategies: "d) A Plan without Watershed Management Area strategies or a Plan that has a proposed Watershed Management Area strategy without information about the funds and/or resources needed to implement a Watershed Management Area strategy is not in compliance with the requirements of Provision B.3.b.(2)(d)."	See Appendix I and Section 4.2.5. For each WMA strategy, the "Implementation Approach" column identifies funding and resources necessary to implement the strategy. The "Implementation Approach" column for the WMA strategies also includes steps necessary to implement the strategy and approximate time needed to complete the various steps. Where appropriate the "Implementation Approach" column notes if funding has already been secured to implement the strategy.
125	Regional Board	WMA Strategies	Noncompliant Watershed Management Area Strategies: "e) A Plan without Watershed Management Area strategies or a Plan that has a proposed Watershed Management Area strategy without a description of the circumstances needed to trigger implementation of Watershed Management Area strategy is not in compliance with the requirements of Provision B.3.b.(2)(e)."	See Appendix I. Strategies have been updated to include the necessary information and with more specificity for triggers.
126	Regional Board	Schedules -- Goals	Issue of Concern: "a) For Plans where the Beaches and Creeks Bacteria TMDLs are applicable and bacteria is the only highest priority water quality condition identified, and only final numeric goals are established for bacteria, the Plan is a Bacteria Load Reduction Plan (BLRP) not a Comprehensive Load Reduction Plan (CLRP). According to the Beaches and Creeks Bacteria TMDLs, the wet weather and dry weather dates for compliance with the final wasteload allocations (WLAs) must be no later than 10 years after the effective date of the TMDLs, which is April 4, 2021. For the Copermittees to have until April 4, 2031 (i.e. 20 years after the effective date of the TMDLs) to achieve the Beaches and Creeks Bacteria TMDLs WLAs, the Plan needs to be a CLRP and incorporate load reduction programs with quantified load reductions for other pollutants of concern in addition to bacteria."	The San Dieguito River WQIP was revised to include quantified load reductions for pollutants in addition to bacteria in Table 4-18. Additionally, the WQIP was revised to further clarify that, if it is demonstrated through monitoring the current highest priority condition is no longer an issue, the WQIP will be modified to identify new highest priority water quality conditions.
127	Regional Board	Schedules -- Goals	Issue of Concern: "b) Several Plans propose more than 20 years from the date the Plan was submitted to achieve final numeric goals if there are no applicable TMDL compliance dates. Schedules proposing to achieve final numeric goals in more than 20 years appear to be relying primarily on BMP implementation, inspection, enforcement, and education activities that are required to be implemented by the Copermittees pursuant to Provisions E.2 through E.7, with few, if any, commitments to implement optional jurisdictional strategies within the first 10 or more years."	This comment does not apply to San Dieguito.

#	Commenter	Category	Comment	Response to Comment
128	Regional Board	Schedules -- Goals	"Noncompliant Schedules for Achieving Numeric Goals: There are several Plans that have a proposed date to achieve compliance with the Beaches and Creeks Bacteria TMDLs by April 4, 2031. Unless the Plan includes quantified load reductions for pollutants in addition to bacteria, the April 4, 2031 date to achieve the final numeric goals for bacteria is not in compliance with the requirement to incorporate CLRPs into the Plan pursuant to Attachment E, Specific Provision 6.b.(2)(c)(i)."	See response to comment #126.
129	Regional Board	Schedules -- Goals	Unacceptable Schedules for Achieving Numeric Goals: "a) Schedules of 10 years or more to address only one highest priority water quality condition are not acceptable, unless there is information provided that allows the San Diego Water Board to make a determination that the schedules are clearly based on the time reasonably required to implement proposed optional jurisdictional strategies."	See response to comment #126. See Appendix I, optional strategies were revised to meet Permit requirements.
130	Regional Board	Schedules -- Goals	Unacceptable Schedules for Achieving Numeric Goals: "b) Schedules of 10 years or more to achieve final numeric goals without optional jurisdictional strategies proposed to be implemented within the next 5 years are not acceptable."	See response to comment #126. See Appendix I, optional strategies were revised to meet Permit requirements.
131	Regional Board	Schedules -- Goals	Unacceptable Schedules for Achieving Numeric Goals: "c) Schedules of 5 years or more to achieve final numeric goals for only addressing one highest priority water quality condition by eliminating unauthorized non-storm water discharges to and from the MS4 without optional jurisdictional strategies proposed to be implemented within the next 5 years are not acceptable."	See response to comment #126. See Appendix I, optional strategies were revised to meet Permit requirements.
132	Regional Board	Schedules -- Strategies	Issue of Concern: "a) In most Plans there were several proposed strategies that did not have any schedules associated with them, other than "to be determined."	See Appendix I. Strategies have been updated to include appropriate schedules.
133	Regional Board	Schedules -- Strategies	Issue of Concern: "b) Most Plans lacked enough information about the shortest practicable time to secure funds and procure resources of initiate implementation of optional jurisdictional strategies and Watershed Management Area strategies."	See Appendix I. Strategies have been updated to include the necessary information and with more specificity for securing funds and procuring resources.
134	Regional Board	Schedules -- Strategies	Issue of Concern: "c) For several strategies that appeared to be limited timeframe or structural projects, they lacked the information about the anticipated time to complete the project based on a realistic assessment of the shortest practicable time required."	See Appendix I. Strategies have been updated to include the necessary information and with more specificity on the implementation schedule.
135	Regional Board	Schedules -- Strategies	Noncompliant Schedules for Implementing Strategies: "a) Strategies that do not have a schedule are not in compliance with the requirements of Provision B.3.b.(3)."	See Appendix I. Strategies have been updated to include appropriate schedules.
136	Regional Board	Schedules -- Strategies	Noncompliant Schedules for Implementing Strategies: "b) A Copermittee that does not have any optional jurisdictional strategies or has proposed an optional jurisdictional strategy without a description of the shortest practicable time to secure funds and procure resources to initiate implementation of the optional jurisdictional strategy is not in compliance with the requirements of Provision B.3.b.(3)(a)(iii)."	See Appendix I. Strategies have been updated to include the necessary information and with more specificity for securing funds and procuring resources.
137	Regional Board	Schedules -- Strategies	Noncompliant Schedules for Implementing Strategies: "c) A Plan without Watershed Management Area strategies or has a proposed Watershed Management Area strategy without a description of the shortest practicable time to secure funds and procure resources to initiate implementation of the optional jurisdictional strategy is not in compliance with the requirements of Provision B.3.b.(3)(b)(i)."	See Appendix I. Strategies have been updated to include the necessary information and with more specificity for securing funds and procuring resources.
138	Regional Board	Schedules -- Strategies	Noncompliant Schedules for Implementing Strategies: "d) Strategies that are expected to be completed within a limited timeframe without information about the anticipated time to complete the project based on a realistic assessment of the shortest practicable time required are not in compliance with the requirements of Provision B.3.b.(3)(a)(v) or B.3.b.(3)(b)(iii)."	See Appendix I. Strategies have been updated to include appropriate schedules.

#	Commenter	Category	Comment	Response to Comment										
139	Regional Board	Other Documents -- WMAA	Until the Plans are accepted by the San Diego Water Board, any exemptions to the hydromodification management BMP requirements of Provisions E.3.c.(2)(a)-(c), proposed in the Plans pursuant to Provision B.3.b.(4)(c), are not authorized to be applied to any Priority Development Projects within a Copermittee's jurisdiction. Likewise, a Copermittee is not authorized to implement an Alternative Compliance Program (pursuant to Provision E.3.c.(3)) for any Priority Development Project within its jurisdiction until the optional Watershed Management Area Analysis developed pursuant to Provision B.3.b.(4) has been accepted as part of the Plans.	Comment noted.										
140	Regional Board	General Comment	<p>The areas of noncompliance identified herein began on the due date to submit the Plans (June 26, 2015) and may be subject to additional future enforcement by the San Diego Water Board or State Water Resources Control Board, including a potential civil liability assessment of up to \$10,000 per day of violation (Water Code section 13385) until the violations are corrected and/or pursue any of the following enforcement actions:</p> <table border="1"> <thead> <tr> <th>Other Potential Enforcement Options</th> <th>Applicable Water Code Sections</th> </tr> </thead> <tbody> <tr> <td>Technical or Investigative Order</td> <td>Sections 13267 or 13383</td> </tr> <tr> <td>Cleanup and Abatement Order</td> <td>Section 13304</td> </tr> <tr> <td>Cease and Desist Order</td> <td>Sections 13301-13303</td> </tr> <tr> <td>Time Schedule Order</td> <td>Sections 13300, 13308</td> </tr> </tbody> </table>	Other Potential Enforcement Options	Applicable Water Code Sections	Technical or Investigative Order	Sections 13267 or 13383	Cleanup and Abatement Order	Section 13304	Cease and Desist Order	Sections 13301-13303	Time Schedule Order	Sections 13300, 13308	Comment noted.
Other Potential Enforcement Options	Applicable Water Code Sections													
Technical or Investigative Order	Sections 13267 or 13383													
Cleanup and Abatement Order	Section 13304													
Cease and Desist Order	Sections 13301-13303													
Time Schedule Order	Sections 13300, 13308													
141	Regional Board	General Comment	In addition, the San Diego Water Board may consider revising or rescinding applicable waste discharge requirements, if any, referring the matter to other resource agencies, or referring the matter to the State Attorney General for injunctive relief, as applicable.	Comment noted.										
142	San Dieguito River Valley Conservancy	Determining Priorities	"We previously provided comments on the draft WQIP to the City on November 21, 2013, June 12, 2014 and to the Regional Board in January of 2015. We do not believe the City considered revisions to the priority water quality conditions based on recommendations from the WQIP Consultation Committee which overwhelmingly supported nutrients be added as a priority water quality condition."	All comments were considered. Please see response to comments tables from consultation committee meetings and public comment periods available on Project Clean Water http://www.projectcleanwater.org/index.php?option=com_content&view=article&id=207&Itemid=194 .										
143	San Dieguito River Valley Conservancy	General Comment	"We reiterate our previous comment that overall, the WQIP process seems very rushed and the timeline to provide thoughtful comments on the WQIP is not adequate. It would be beneficial for all stakeholders, including the Consultation Committee, to have the opportunity and more time to review and comment on these important documents."	Comment will be forwarded to the Regional Board.										
144	San Dieguito River Valley Conservancy	Determining Priorities	"Based on the continued assertion that bacteria is the highest priority condition in the San Dieguito watershed, we are not convinced that the City Stormwater, Public Utilities and Multiple Species Conservation Program (MSCP) are sharing water quality and species data obtained through City water quality and MSCP projects being implemented within the watershed."	This data was reviewed and is included in the list of studies in Appendix D. Note that the MSCP data terrestrial biological data and direct water quality related data is used to assess the health of receiving waters.										

#	Commenter	Category	Comment	Response to Comment
145	San Dieguito River Valley Conservancy	Determining Priorities	"The WQIP should add Lake Hodges as a Focused Priority to prevent the water quality of the land and river to deteriorate further from additional development in the watershed. Lake Hodges suffers from nutrient related contamination. The nutrient issue will not be adequately addressed by strategies devoted to reduce bacteria."	<p>During the development and adoption of the MS4 Permit there was general agreement from the Regional Board, Regional Board staff, municipal permittees and stakeholders that not all issues can be high priority for each of the WMAs; prioritization of issues must be an essential component of the WQIP process so that sufficient focus can be directed to the most critical issues. As such, the MS4 Permit gives the Responsible Agencies discretion to develop a methodology for selecting the Highest Priority Water Quality Condition (HPWQC). Many factors were considered to develop the methodology. The Responsible Agencies must comply with existing TMDL regulations; therefore, TMDLs are a primary factor of the methodology, elevating them to highest priority. The Responsible Agencies' methodology does allow for the additional screening of non-TMDL impairments; however, it was determined that those conditions did not warrant elevation to highest priority due to a lack of monitoring data linking MS4 discharges to those conditions. It was also determined that the strategies proposed to address TMDL-associated conditions provide multiple benefits to other pollutants, and therefore would address other conditions in the watershed. There is not enough data to determine the MS4 contribution of nutrients to Lake Hodges. Also, initial research indicates that MS4 lands represent a minority of the land area draining to Lake Hodges. The lack of data on this priority water quality condition warrants special studies and/or additional monitoring. The City of San Diego's Public Utilities Department (PUD), as the owner and operator of Lake Hodges, is well positioned to lead a collaborative effort involving Responsible Agencies and other dischargers and interests that may be contributing to the impairment in Lake Hodges. Appendix I identifies a strategy to Collaborate with City of San Diego Public Utilities Department and other watershed stakeholders in the Lake Hodges Water Quality Concentration Study. The study will characterize conditions and identify sources of nutrients (including non-municipal sources) in Lake Hodges. Results of the special study will be used to consider appropriate strategies/ implementation actions that may be identified in future WQIP updates. For example, as Bacteria in the shoreline is addressed, parallel efforts to identify sources of nutrients in Lake Hodges can take place so the priority condition is ripe for elevation to highest priority condition status.</p> <p>*The Section 2.4 of the WQIP was revised to further clarify that, if it is demonstrated through monitoring the current HPWQC is no longer an issue, the WQIP will be modified to identify new HPWQC(s). In addition, Table 4-18 was added to Section 4.3.2 with estimated load reductions for various pollutants, including nutrients. In many cases, the load reduction for other pollutants is greater than the load reduction for bacteria. Appendix I was also revised to identify other pollutants addressed by strategies implemented by the Responsible Agencies.</p>

#	Commenter	Category	Comment	Response to Comment
146	San Dieguito River Valley Conservancy	Determining Priorities	"There are four water storage reservoirs in the San Dieguito River watershed including Sutherland Reservoir, Lake Ramona, Lake Poway and Hodges Reservoir, that serve not only the residents within the watershed, but citizens throughout the county. San Diego's Public Utilities Department operates and maintains Sutherland and Hodges Reservoirs. Hodges currently serves the San Dieguito Water District and Santa Fe Irrigation District, as well as the City. The Ramona Municipal Water District owns and manages Lake Ramona. Water from Lake Ramona is used exclusively in the untreated system serving the Highland Valley area of Ramona and for emergency storage purposes. Two additional reservoirs – Olivenhain and San Dieguito – are located in the Carlsbad watershed but routinely receive water transferred from Hodges Reservoir. Olivenhain Reservoir is managed by the San Diego County Water Authority. The San Dieguito Water District, a subsidiary of the City of Encinitas, provides drinking and recycled water to over 38,000 citizens in the communities of Leucadia, Old Encinitas, Cardiff and portions of New Encinitas. The remainder of the City is served by the Olivenhain Municipal Water District. The City must obtain data from these other water providers for input into the WQIP."	There was a call for data and all data submitted were considered.
147	San Dieguito River Valley Conservancy	Determining Priorities	"Nutrient loading should be recognized as another highest priority water condition due to the impacts to the quality of the water that residents throughout the County drink and utilize in their homes and businesses (i.e., Lake Hodges as a receiving water), would be a PRIORITY BENEFICIAL USE and that NUTRIENT loading should be elevated to High PRIORITY WATER QUALITY CONDITION in the upper watershed east of the Hodges Reservoir and west of Sutherland Reservoir."	Many data sources were reviewed and included in the list of studies in Appendix D and the Responsible Agencies have selected the HPWQC based on the methodology in Appendix A. See response to comment #1 and #145.
148	San Dieguito River Valley Conservancy	Determining Priorities	"We concur with the comment made by Coastkeeper in its June 12, 2014 letter that: ". . . [T]he San Dieguito watershed could be divided between regions upland of Lake Hodges and below Lake Hodges, allowing for an additional High Priority Water Quality Conditions (such as nutrients) where applicable. . . . Coastkeeper respectfully asks the Board to urge each watershed to strongly re-consider taking approaches by dividing between upper and lower watersheds, or between receiving water bodies upstream from the Pacific Ocean.""	The Responsible Agencies have selected the HPWQC based on the methodology in Appendix A. See response to comment #145.
149	San Dieguito River Valley Conservancy	Determining Priorities	"There is no mention of any projects funded by IRWM grants that address bacteria as the highest priority water condition. There is no data to support bacteria as the highest priority water condition."	WMA strategy Participation in San Diego Integrated Regional Water Management Program was added to Section 4.2.5. This strategy was also identified by various Responsible Agencies in Appendix I. Appendix I also includes two strategies in the City of San Diego's strategies table: the Natural Treatment System Project (CSD-46) and the water quality concentration study in collaboration with PUD is currently (CSD-38.4).
150	San Dieguito River Valley Conservancy	Determining Priorities	"The City has not provided a clear explanation of why the WQIP continues to use BACTERIA when the receiving water (Pacific Ocean) was delisted for bacteria in 2010. We need an explanation that definitively sets forth the reasoning and methods used by the City to assess priority conditions in the San Dieguito River watershed and need to know the baseline to determine how much effort a jurisdiction will be required to take to reach the goal for bacteria."	See response to comment #1, #11 and #145. Section 4.1 explains the data available and additional rationale for keeping bacteria as the highest priority water quality condition: Appendix H presents the Bacteria TMDL targets and a discussion of the existing condition at the shoreline. The TMDL model estimates the frequency of water quality objective (WQO) exceedances for wet weather and requires the Responsible Agencies to calculate dry weather exceedances based on historical data. During wet weather, the TMDL model results estimate an almost 50% exceedance frequency for all indicator bacteria. Wet weather monitoring data at the shoreline is not available to confirm the model results. To calculate the existing condition for dry weather, an analysis of the available monitoring data collected between 1996 and 2002 (defined as the existing condition in the Bacteria TMDL), resulted in exceedances of WQOs between 6% and 17% for the three indicator bacteria.

#	Commenter	Category	Comment	Response to Comment
151	San Dieguito River Valley Conservancy	Determining Priorities	"There must be data available to support the delisting of the receiving water for bacteria in 2010. It is imperative that this data be reviewed and analyzed to determine the baseline condition at the receiving water for bacteria. We have asked for this data to be provided and it has not been provided to us to date. We again request that this data be provided."	Language was added to Section 4.1 to explain the data available and additional rationale for keeping bacteria as the highest priority water quality condition. Appendix H presents the Bacteria TMDL targets and a discussion of the existing condition at the shoreline. The TMDL model estimates the frequency of water quality objective (WQO) exceedances for wet weather and requires the Responsible Agencies to calculate dry weather exceedances based on historical data. During wet weather, the TMDL model results estimate an almost 50% exceedance frequency for all indicator bacteria. Wet weather monitoring data at the shoreline is not available to confirm the model results. To calculate the existing condition for dry weather, an analysis of the available monitoring data collected between 1996 and 2002 (defined as the existing condition in the Bacteria TMDL), resulted in exceedances of WQOs between 6% and 17% for the three indicator bacteria. Information on impaired bodies can be found here: http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml .
152	San Dieguito River Valley Conservancy	Determining Priorities	"Data associated with several ongoing projects in the Lake Hodges has been provided to the City to support nutrient loading as a highest priority water condition. That data must be reviewed and analyzed by the City."	All monitoring and data collected by Responsible Agencies was reviewed. A data call was made at the beginning of the WQIP development process and was considered. All data that was considered is listed in Appendix D.
153	San Dieguito River Valley Conservancy	Determining Priorities	"Since 2007, several projects recommended as part of the WMP were funded by millions of dollars of the State bond grants to assist the jurisdictions in meeting water quality and conservation goals associated with nutrient loading." "The WQIP should include any recommendations and findings from these projects into the management strategies."	The collaborative strategies identified are building on past projects and Responsible Agencies continue to participate and review these projects as part of the IRWM/RAQ process. The following strategy has been added by various Responsible Agencies: WMA-6, Participation in San Diego Integrated Regional Water Management Program.
154	San Dieguito River Valley Conservancy	Determining Priorities	"The Conservancy is implementing Integrated Regional Water Management Project No. 50-17-80017, known as the San Dieguito Watershed Management Plan Implementation Project – Lake Hodges Natural Treatment System (NTS) Conceptual Design, funded by Proposition 50. For purposes of this study, the project is referred to as the Hodges Reservoir Watershed Natural Treatment System project. As the name suggests, this planning effort focuses on evaluating methods to reduce nutrient loading through the development of an NTS within the watershed draining into Hodges Reservoir."	See Appendix I, City of San Diego strategy CSD-46.
155	San Dieguito River Valley Conservancy	Determining Priorities	"Pursuant to a Proposition 84 grant, the City of San Diego Public Utilities Department and the Water Authority are administering a contract to have a consultant team evaluate in-reservoir treatment and management options to improve water quality. The team specifically evaluated water quality trends, evaluated methods to improve water quality through a Dynamic Reservoir Simulation Model – Water Quality model, recommended a set of projects to reduce the level of pollutants that contribute to federal Clean Water Act Section 303(d) impairment listings for Hodges Reservoir, and evaluated how these water quality changes will impact Quagga mussels (<i>Dreissena rostriformis</i>). A Draft Conceptual Planning Report (Brown and Caldwell 2014) was reviewed in preparation of this document, as it is complementary with the watershed NTS project."	The WQIP references this ongoing project. See Appendix I, City of San Diego strategy CSD-46.
156	San Dieguito River Valley Conservancy	Determining Priorities	"The Proposition 50 Conservancy and Proposition 84 City Public Utilities' projects are not mentioned in the WQIP. It is expected that these two efforts would function in a complementary fashion to achieve the overall goal of improved water quality, reduced treatment costs, improved water supply reliability, and opportunistic improvement to native habitat and species conservation."	See Appendix I, City of San Diego strategies CSD-46 and CSD-38.4.

#	Commenter	Category	Comment	Response to Comment
157	San Dieguito River Valley Conservancy	Determining Priorities	"Other projects undertaken since 2007 include: - Hodges Reservoir Water Quality Improvements Implementation Projects (City of San Diego Public Utilities Department); - Hodges Reservoir Water Quality Improvements Plan (City of San Diego Public Utilities Department); - Groundwater and Salt Management Program (Santa Fe Irrigation District) - North County Regional Water Supply, Flood Control, Water Quality, and Habitat Protection/Enhancement Project (Santa Fe Irrigation District)"	See Appendix I, City of San Diego strategies CSD-46 and CSD-38.4. Various Responsible Agencies also included WMA-6 Participation in San Diego Integrated Regional Water Management Program.
158	San Dieguito River Valley Conservancy	Determining Priorities	"We refer to Laura Hunter's letter of January 29, 2015 relating to the "myriad" of pollution problems at Felicita Creek. The City and the County need to correct the issues at Felicita Creek, which negatively impact Lake Hodges."	The Responsible Agencies have selected the highest priority water quality condition based on the methodology in Appendix A. See response to comment # 145. The City of Escondido included a strategy to collaborate on Felicita Creek. Other strategies targeting Lake Hodges are included by other Responsible Agencies as indicated in Appendix I.
159	San Dieguito River Valley Conservancy	Public Strategies	"The watershed has significant biological importance which is underscored by its inclusion in the County's award-winning Multiple Species Conservation Program (MSCP) Plan. This is important because MSCP lands are designated as valuable habitat required to be conserved and managed to support the viability of over 85 different plant and animal species. Non-structural BMP's, including invasive species removal and habitat restoration should be considered in these areas."	Some Responsible Agencies have included land conservation as a strategy in Appendix I. The prohibition of sale of invasive species is beyond the Water Quality Improvement Plans on a state level. However, all Responsible Agencies have ordinances prohibiting or discouraging invasive species and have included strategies that address invasive species. See Appendix I, some Responsible Agencies include strategies for removal of invasive plants, and/or use of non-invasive plants in new development/redevelopment.
160	San Dieguito River Valley Conservancy	Public Strategies	"The WQIP includes the following definition of "Beneficial Uses": "The beneficial uses of a waterbody are designated in the San Diego Regional Basin Plan and defined as "the uses of a waterbody necessary for the survival or well-being of man, plants, and wildlife (SDRWQCB, 1994). However, The WQIP and the Potential Strategies do not include and thorough discussion or specific priority strategy that is related to habitat restoration or enhancement (removal of invasive plants and planting of native species) which will not only sustain habitat for wildlife, but also provide water quality benefits downstream of these activities. The WQIP only suggests that invasive plants should be 'avoided' in multi-use treatment areas. They should be prohibited everywhere."	The HPWQC is bacteria in San Dieguito WMA which is tied to the beneficial use of recreational water quality and protection of human health. See response to comment #151.
161	San Dieguito River Valley Conservancy	Public Strategies	"The reference documents should include any watershed specific MSCP species monitoring data that may indicate the presence of species or adaptive management actions that need to be taken to improve the viability of the preserve."	See response to comment #159.
162	San Dieguito River Valley Conservancy	Public Strategies	"A diverse array of habitats exist from the eastern headwaters at Volcan Mountain to the outlet at the San Dieguito Lagoon and the Pacific Ocean. There are several important natural areas that sustain a number of sensitive, threatened and endangered plant and animal species within the River Park, San Dieguito Lagoon and several open space preserves. If invasive plants such as arundo or eucalyptus proliferate upstream, they will take over the native habitat, deteriorating the viability of the habitat to support aquatic and other species downstream, impacting the success of the MSCP."	See response to comment #159.
163	San Dieguito River Valley Conservancy	Public Strategies	"Water quality and watershed restoration and enhancement activities need to be well coordinated in an integrated and sustainable manner, key interest groups should be able to communicate, share their perspectives, and work together to create and implement coordinated solutions for watershed issues. Other activities related to the watershed and water quality, including issuance of waste discharge requirements for agriculture and integrated regional water management planning will also benefit from the active participation of the public."	The following strategies were included by various Responsible Agencies in Appendix I: Participate in a Watershed Council and Participation in San Diego Integrated Regional Water Management Program.

#	Commenter	Category	Comment	Response to Comment
164	San Dieguito River Valley Conservancy	Public Strategies	<p>"In 2007, the San Dieguito Watershed Council (Council), co-chaired by the San Dieguito Conservancy and the River Park, was formed pursuant to a recommendation from the 2007 San Dieguito River Watershed Management Plan (WMP) to implement the WMP and take actions as necessary to reflect changing watershed conditions through a coalition of stakeholders. The jurisdictions built their capacity to work locally and think regionally through the Watershed Council, focusing their efforts on educating citizens about their responsibility to conserve water and improve water quality. Unfortunately, ongoing funding for the Watershed Council was not identified and the Council has not met since 2010.</p> <p>There is an immediate need to re-initiate the Watershed Council to coordinate the implementation of the WMP and development of the WQIP. It is imperative that the WQIP and the WMP recommendations and priorities are consistent to prevent duplication of efforts and higher costs related to water quality projects in order to obtain future grant funding for implementation projects. The re-initiation of the Watershed Council should be a priority strategy in the WQIP."</p>	See Appendix I. Participation in a Watershed Council is included as an optional WMA strategy by various Responsible Agencies.
165	San Dieguito River Valley Conservancy	Optional Strategies	"There are several optional strategies that should be pursued immediately and not until a later date. It is imperative that the co-permittees acquire open space land now as a priority strategy before it is developed to prevent further water quality impacts."	See Appendix I for triggers required in order to implement optional strategies. Note Appendix I indicates if an optional strategy is already being implemented by Responsible Agencies.
166	San Dieguito River Valley Conservancy	Optional Strategies	"There are several optional strategies that should be pursued immediately and not until a later date....It is imperative that the co-permittees reinstate the Watershed Council now to coordinate all of these ongoing watershed, water quality, proposition 50 and proposition 84 projects and provide a forum for public input."	See Appendix I. Participation in a Watershed Council is included as an optional WMA strategy by various Responsible Agencies.
167	San Dieguito River Valley Conservancy	Optional Strategies	"There are several optional strategies that should be pursued immediately and not until a later date....It is imperative that future projects, policies and regulations included in the WQIP build upon and/or complement what has been accomplished during the last five years."	See Appendix I for triggers required in order to implement optional strategies. Note Appendix I indicates if an optional strategy is already being implemented by Responsible Agencies.
168	San Dieguito River Valley Conservancy	Public Strategies	"The comprehensive planning and public outreach efforts of the WQIP, WMP and IRWM efforts must be incorporated into an overall water quality improvement strategy by the agencies and stakeholders. It is only through a collaborative approach that we will improve the water quality in our watersheds."	The following strategies were included by various Responsible Agencies in Appendix I: Participate in a Watershed Council and Participation in San Diego Integrated Regional Water Management Program.