

San Diego SWCUFS Response to TAC Comments on TM 1: Data Collection

ID	Comment	Source	Date Entered	Response to TAC
1	The State Water Board's STORMS team is compiling info on capture projects. When that becomes available it should be incorporated into this study, assuming it becomes available in a timely manner.	SD Coast Keeper Matt O'Malley	9-Oct-17	These projects will be incorporated if STORMS releases them in time not to negatively affect the project timeline.
2	Section 1.3 : We question whether 2050 land use assumptions are accurate, including a near tripling of residential uses by area, especially if future residential involves redevelopment and infill.	SD Coast Keeper Matt O'Malley	9-Oct-17	This uncertainty will be addressed more clearly in the Feasibility Study report.
3	Sections 1.7 and 1.8: Did consultants do individual requests to receive GIS documents of stormwater and wastewater conveyance to each individual municipality/jurisdiction in the County, or did they just rely on what was already publicly available via SanGIS? It seems like the former but we're inquiring for clarification. SD Coastkeeper has GIS data from the majority of jurisdictions for stormwater and wastewater and can provide any data your team does not have if we have it.	SD Coast Keeper Matt O'Malley	9-Oct-17	The team started with SanGIS, then expanded by contacting other agencies/municipalities. If SD Coast Keeper has already compiled all of this, the team will take their offer to share and compare their datasets with ours to fill gaps. The resulting dataset will be used in the Feasibility Study analysis.
4	Figure 12: Include "Local Jurisdictions/County" in the "Jurisdictional" column as lead regulatory driver. This will help capture the reality that local jurisdictions govern via ordinance/code as well.	SD Coast Keeper Matt O'Malley	9-Oct-17	This will be included in the figure for the Feasibility Study Report.
5	Section 2.2.8 : May want to add a section 2.2.9 that includes SB-231 (Hertzberg) on redefining "sewer"	SD Coast Keeper Matt O'Malley	9-Oct-17	SB-231 (Hertzberg) will be acknowledged in the Feasibility Study Report.
6	Section 1.4.2 (p14) "(and in some cases must)." Why must these public facilities be integrated into SW capture feasibility and use plans? Seems uncompromising, wouldn't it be better to say that they "should" or "that it could facilitate compliance with ?TMDL regulations."	City of Escondido Helen Davies	10-Oct-17	Agreed. This will be incorporated into the Feasibility Study Report.
7	Section 1.8.1 (p20) Escondido resent their conveyance system data (GIS layer for the MS4) at the beginning of August (it had been previously provided for the Storm Water Resource Plan). Please delete us from the list of Cities that have not provided this information.	City of Escondido Helen Davies	10-Oct-17	This data will be included in the Feasibility Study analysis.
8	Table 6 (p28) Bacteria TMDL - may wish to consider annotating to indicate that this TMDL may be reopened.	City of Escondido Helen Davies	10-Oct-17	This will be noted in the Feasibility Study Report.
9	Section 2.3.1 (p30) Replace WCIP with WQIP.	City of Escondido Helen Davies	10-Oct-17	This will be corrected for the Feasibility Study Report.
10	Table 7 (p30) WQIP is a "living document" that will be continually adapted. Saying that it is "complete" may seem inconsistent. Change "complete" to "accepted" (i.e., accepted by the RWQCB).	City of Escondido Helen Davies	10-Oct-17	This will be updated for the Feasibility Study Report.
11	Table 9 Our UWMP has been reviewed, so it should say "yes" for Escondido. Change to "yes" for Escondido.	City of Escondido Helen Davies	10-Oct-17	This will be updated for the Feasibility Study Report.

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12	Figure B-10 The service area shown on B-10 (and maybe other places) is related to our LAFCO authorized area, not where we actually provide service.	City of Escondido Helen Davies	10-Oct-17	This will be more clearly defined/described in the Feasibility Study Report.
13	Table 3 The water management agencies appear to be incorrect. For example Warner Valley is associated with Vista Irrigation District, San Pasqual Valley is managed by the City of San Diego.	City of Escondido Helen Davies	10-Oct-17	These relationships will be revised for the Feasibility Study Report.
14	Sec 1, p 1-1, Pgph 2 Provide reference for the stated numbers	ESA Lindsey Sheehan	10-Oct-17	Source will be cited in Feasibility Study Report.
15	Sec Memorandum, p 2, 1st section Was direct potable use ever discussed as an option or is this too resource-intensive or barriers to treatment/permitting?	City of Oceanside Justin Gamble	10-Oct-17	Direct treatment for potable use will be included where feasible, where local treatment is sufficient to provide inflows to potable water treatment plants. If a feasible project is proposed, it will be included.
16	Sec 1.2, p 6, Figure 2 Watershed Management Area boundaries not showing up in Figure 2 map (note: could be an issue with Adobe Reader...)	City of Oceanside Justin Gamble	10-Oct-17	This will be corrected in future submittals.
17	Sec 1.3, p 7 For planned land use data, elaborate further on whether future changes to impervious area will be used to calculate incremental changes in runoff volumes, and how that will affect sizing potential capture projects	City of Oceanside Justin Gamble	10-Oct-17	The Feasibility Study analysis will include a description of how and to what extent land use data were used.
18	Sec 1.4, p 10-13, Figure 5-8 Same comment as above, GIS data not showing in Figures 5-8	City of Oceanside Justin Gamble	10-Oct-17	This will be corrected in future submittals.
19	Sec 1.4.1, p 14 Runoff section should describe calculation of runoff volumes from typical storm sizes within major delineated drainages. It is a crucial exercise to assessing feasibility and sizing of capture methods. As for natural habitats relying on dry weather flows to some extent, describe what data are needed (or were received) to assess those requirements.	City of Oceanside Justin Gamble	10-Oct-17	The Feasibility Study analysis will include a description of how runoff calculations were performed.
20	Sec 1.5, p 15-17, Figures 9-11 Same comment as above, GIS data not showing in Figures 9-11	City of Oceanside Justin Gamble	10-Oct-17	This will be corrected in future submittals.
21	Sec 1.5, p 18, Table 3 Heading on right-hand column should be "Water Management Area" ... not "Agency"	City of Oceanside Justin Gamble	10-Oct-17	This will be corrected for the Feasibility Study Report.
22	Sec 1.6, p 18 Should mention that water quality data should be assessed on a land-use basis if data are being used to make generalizations about treatment requirements in different parts of the San Diego region. This is possible given the land-used based assessments the Phase 1 copermittees had to perform under the MS4 Permit Provision D (wet weather monitoring)	City of Oceanside Justin Gamble	10-Oct-17	The Feasibility Study Report (and analysis) will include a description of how land use data were used, including with respect to water quality.

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23	<p>Sec 2, p 23, Figure 12 Project level in this diagram should include SWQMPs for priority development projects or some coordination with the jurisdictional BMP Design Manuals. They have a substantial influence on project design for capture/treat/infiltration of storm water.</p>	<p>City of Oceanside Justin Gamble</p>	<p>10-Oct-17</p>	<p>This will be included in the figure for the Feasibility Study Report.</p>
24	<p>Sec 2, p 24, Table 5 If this table is supposed to show how permits/plans relate to the beneficial uses of stormwater capture, explain the check marks. I.e., does this mean that each piece of legislation or plan listed endorses or allows the Benefit in the corresponding left-hand column?</p>	<p>City of Oceanside Justin Gamble</p>	<p>10-Oct-17</p>	<p>This table indicates which legislation may be applicable for each beneficial use, depending on the specific project.</p>
25	<p>Sec 3.3, p 33 Elaborate on how Integrated Resource Plans (energy) relate to the capture/use of stormwater</p>	<p>City of Oceanside Justin Gamble</p>	<p>10-Oct-17</p>	<p>The benefits associated with reduction in GHGs from reduced pumping of water from outside the region will be evaluated in the Feasibility Study Report.</p>
26	<p>Sec Attachment A, p 115, Figure B-68 Doesn't appear that Army Corps basins /flood control structures were included in this map of San Luis Rey WMA. Please let me know if the consultant team needs spatial data for basins in this WMA managed both by the Army Corps and the City of Oceanside.</p>	<p>City of Oceanside Justin Gamble</p>	<p>10-Oct-17</p>	<p>The USACE-managed infrastructure will be acquired and used in the Feasibility Study analysis.</p>
27	<p>Sec Attachment A, p 124, Figure B-77 Please explain definition of Groundwater Basins Not Suitable for Domestic Use. In this map the Mission Basin of San Luis Rey WMA is listed as not suitable; the City of Oceanside currently extracts, treats and distributes a significant portion of its local water supply to its customers from the Mission basin.</p>	<p>City of Oceanside Justin Gamble</p>	<p>10-Oct-17</p>	<p>This figure will be corrected in the Feasibility Study Report to more accurately describe basins that cannot be directly extracted for potable use (but may be extracted and further treated based on water quality testing and treatment).</p>
28	<p>Sec. 1.5 "Figure 10 provides a map of DWR, Bulletin 118 designated groundwater basins in the county." There are other groundwater basins in the County, the map displays basins that have been designated by DWR.</p>	<p>County of San Diego Jim Bennett</p>	<p>16-Oct-17</p>	<p>This will be updated for the Feasibility Study Report.</p>
29	<p>Figure 10 Some of the basin boundaries need to be updated. Basin boundaries are incorrect in the "Coastal Plain of San Diego." Borrego Valley should also show the Borrego Springs and Ocotillo Wells sub-basins. See: https://gis.water.ca.gov/app/bbat/ for up-to-date boundaries.</p>	<p>County of San Diego Jim Bennett</p>	<p>16-Oct-17</p>	<p>These boundaries will be updated for the Feasibility Study Report (and analysis).</p>

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30	<p>Sec 2.2.10</p> <ul style="list-style-type: none"> - Needs to address that high and medium priority basins are subject to SGMA. Priority of basin was determined by DWR using parameters such as population, number of wells, etc. - Medium priority basins within San Diego County include: San Pasqual Valley, San Luis Rey River Valley, San Diego River Valley, and Borrego Valley. The County is a Groundwater Sustainability Agency (GSA) member for each of the four basins. There are no high priority basins. - SGMA Deadlines: GSA formation by 6/30/2017, Groundwater Sustainability Plan (GSP) adopted by January 31 2020 for Borrego Valley and January 31st 2022 for San Pasqual Valley, San Luis Rey River Valley and San Diego River Valley. Basins must achieve groundwater sustainability goals within 20 years of GSP adoption. - Suggest making some mention of how storm water and SGMA are related. Stormwater could be used as aquifer recharge and could be a benefit to SGMA basins, SGMA requires extensive modeling of watersheds and stormwater is an important component, etc. 	<p>County of San Diego Jim Bennett</p>	<p>16-Oct-17</p>	<p>Basin priority and the SGMA will be acknowledged in the Feasibility Study Report.</p>
31	<p>Sec 3.5</p> <ul style="list-style-type: none"> - Mention of California Statewide Groundwater Elevation Monitoring (CASGEM) basins currently monitored and reported within San Diego County (San Luis Rey Valley, Borrego Valley, San Pasqual Valley, San Diego River Valley and Warner Valley). - "Basin Information Sheet" needs more clarification. Is this in reference to the DWR basin prioritization sheet? Needs reference. - DWR Bulletin 118 is a great resource and could be mentioned in this section. 	<p>County of San Diego Jim Bennett</p>	<p>16-Oct-17</p>	<p>Data from CASGEM will be used in the Feasibility Study analysis. The Basin Information Sheets will be better described and DWR Bulletin 118 will be used in the Feasibility Study Report.</p>