

## **APPENDIX D**

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# **Response to Comments**

Prepared for:

San Diego Regional Storm Water Copermittee  
County of San Diego Department of Public

# memorandum

date           October 21, 2016

to             Ruth Dela Rosa, County of San Diego

cc

from          David Pohl PhD, PE and Lindsey Sheehan PE

subject       Response to Comments on Stormwater Resources Plan Checklist

This memo summarizes ESA's response to comments provided on the Stormwater Resources Plan (SWRP) checklist and the updates that were made to the checklist.

## **Comments from Helen Davies in an email to Ruth Dela Rosa on October 10, 2016:**

1. My main comment is that it is overly complicated to get a project in the SWRP using these criteria. Some of the requirements are impracticable, refer inappropriately to our water quality improvement plans, or relate to items that may not exist.

*ESA response:* All projects that satisfy the eligibility requirements would be included in the SWRP. The criteria simply provide a method for ranking the projects.

2. Example 1:

For a project to be considered to be addressing a flood plain issue, it needs to be in a Watershed Flood Management Plan.

Do documents exist for each watershed? At what resolution (detail) do they work? When were they last updated? Not every flooding issue would be entered in such a plan. It would be typical for a municipality to take steps to address the issue, not place it in a plan. The flooding issue could more readily be documented through customer complaints and work order requests.

This comment can also be applied to requirements to refer to plans, including but not limited to urban greening plans and habitat plans.

*ESA response:* A project could still be included in the SWRP even if it was not in a Watershed Flood Management Plan (or any other plans). Inclusion in one of these plans gives a project additional points, but it is not required. The SWRP guidelines require consideration of a geospatial analysis of benefits, and

these plans provide those analyses. Additionally, a project that has been prioritized in one of these plans has a better chance of receiving funding.

3. Example 2:

It seems that each project needs to have a whole host of complex calculations completed before it can be listed as a project. I noted the following: pollutant load reductions, infiltration volumes (across several flow charts), filtration volumes, and evaporation volumes, estimates of coarse sediment delivery, subsurface recharge, volumes that are diverted to irrigation and ground water recharge, indirect infiltration, non-direct use (how's that different from the others?), reductions in volumes of storm water flow, reduction of peak flows and duration, change in water temperatures, reductions in energy use, additional urban green space. I could not read the environment and community flow charts, but I am sure additional examples can be found on those charts.

No-one will have that kind of information at the time that they are wanting to put the project into the SWRP (during conceptual design). In fact it would be unreasonable to expect municipal inhouse staff to be able to provide all that data, which means that they need to hire a consultant to make those calculations – with funding from what source? If estimates are provided, how reliable will they be? It is not typical to design a project, have it at 100 percent design (when this data can be reasonably be estimated) and have it sitting around on a shelf while funds are being sought for construction. Typically a municipality would need to have some reasonable expectation of funding before investing in a high level of engineering design to provide that data.

**ESA response:** A project could still be included in the SWRP even if it does not have all of the calculations (or any) complete. We agree that having these calculations completed may not be feasible, so the scoring for having these values is lower than for the other questions. The SWRP guidelines require a quantitative analysis, so these criteria have been included to account for that. Additionally, projects that have completed this level of analysis will have a better chance of receiving funding, so the criteria was developed with this in mind.

4. Example 3:

Our water quality improvement plans do not have “high priority strategies” or necessarily “high priority drainage areas.”

High priority water quality condition (HPWQC) is used to focus copermittee efforts and is the most appropriate guide to whether a project should be prioritized. It would be helpful if the project is listed as a “strategy” or “optional strategy,” but it is not critical as SWRP updates may not match up with WQIP updates (typically during annual reporting).

**ESA response:** The wording of the question has been changed to say, “Has the project been identified and assessed as a strategy associated with high priority water quality conditions in the applicable WQIP?” The SWRP checklist and criteria is intended to be a living document, and questions will change as new funding opportunities and related documents arise. If the WQIPs are replaced with updates, the criteria would be updated to reflect this.

5. Overall I am concerned that it will be very challenging to get a project listed in a SWRP, resulting in even less access to funding opportunities, particularly for municipalities that are not able to hire consultants for speculative work. It's not critical for a project to be listed to have all that detail worked out. If a funding opportunity comes up for the project and if the grant application needs the level of detail shown here, then the municipality can make the cost benefit decision to do the work then. The ability of projects to get onto the SWRP project list is critical not just for funds provided through this mechanism, but in other grant applications (which I have already seen) that ask if the project is presented in a SWRP. At present this process does not allow for the full complement of available projects to be included which I think is detrimental to the goal.

*ESA response:* All projects that satisfy the eligibility requirements would be included in the SWRP. The criteria simply provide a method for ranking the projects. Additionally, since the checklist and criteria will be a living document, it is expected that project proponents could return to the checklist as more data on their projects becomes available (or after a cost benefit decision to do work has been made).

**Comments from Sheri McPherson to Ruth Dela Rosa on October 10, 2016:**

6. Be sure to include language in the plan that allows for the use of plans that are not currently listed or don't exist at this time.

*ESA response:* Agreed. This will be covered in Chapter 5 and 9.

7. Consider adding "watershed management plans". Many of the regions watersheds had watershed management plans developed as part of Prop 13 grant funds back in the 2000s. These plans are still used to some degree within the watersheds. These plans are very holistic addressing water resources (both surface and groundwater) as well as biological and habitat priorities. This should be a consideration for questions 8, 19, 24 and 36 or added as a new question (especially in Section 2.1.2).

*ESA response:* We will add Watershed Management Plans to the document

8. Question 24: Broaden the question by removing "Priority" and allow for partial points. For example, an issue/facility that is addressed by a project might be identified in a drainage master plan but does rank as priority (for County Flood Control, priority is considered the top ten projects but there are hundreds of other needs that don't rank in the top ten). The points could be assigned based on where the issue/project falls in the master plan ranking. For example: 20 pts. for project identified as the highest priority; 15 pts. for projects in the top 25% of the ranked project list; 10 pts. for projects ranked in the top 50% of the project list; and 5 pts for projects ranked in the top 75% of the project lists.

*ESA response:* We like this idea, but to keep it simpler, we propose giving priority projects the full 20 points and any other projects that are listed and ranked 10 points.

9. Section 2.5, question 45. Some of our community input gets reflected in the County's 5-year operational plan for capital improvement plans (for DPW and DPR). It would be good to include these plans in the list of plans for consideration. You may wish to consider the addition of Active Transportation Plans as well. These plans receive community input to rank transportation improvement needs that can be used to

inform project locations for green streets and other project types (such as using Right-of-Way to infiltrate flows).

*ESA response:* We will include these plans.

### **Checklist Updates**

- Added DCA to watershed prioritization section of Community Benefit
- Added “and/or other watershed-based plans” to the watershed prioritization section
- Rewording of WQIP watershed prioritization question based on Helen’s comment #4 above
- Added watershed management plans in the watershed prioritization question for Environment per Sheri’s comment #7 above
- Adjusted watershed prioritization scoring based on a simplified version of Sheri’s comment #8 above
- Added County’s 5-year operational plan and active transportation plans based on Sheri’s comment #9 above

**Table D1. Comments on the DRAFT SWRP**

Comment #	Commenter	Affiliation	Section No.	Page No.	Paragraph	Comment	Response to Comments	Suggested Follow-up
1	Beth Payne	SWRCB	1 (and throughout)	1-1	2	Throughout the document, it is stated or implied that the the Storm Water Resource Plan Guidelines are regulations. To clarify, the State Water Board's Storm Water Resource Plan Guidelines are NOT a regulation or regulatory. SB985 requires the State Water Board to provide <u>guidance</u> for public agencies for the development of Storm Water Resource Plans (SWRPs) consistent with Water Code sections 10560 <i>et seq</i> . Water Code section 10563, subdivision (c)(1), requires a SWRP as a <u>condition of receiving funds</u> for storm water and dry weather runoff capture projects from any bond approved by voters after January 2014.	The text in Section 1 has been revised to reflect that SWRP guidelines are to guide public agencies in the development of SWRPs.	Addressed in Draft Final Submitted 1/31
2	Beth Payne	SWRCB	1.8	1-11	1	"The Appendix A checklist has been certified by the County of San Diego for the San Diego Copermittees." Explain what the "certification" signifies for this completed Checklist.	Certification indicates that the checklist is complete, accurate and addresses the elements of the SWRP checklist. This has been clarified in this paragraph.	Addressed in Draft Final Submitted 1/31
3	Beth Payne	SWRCB	3	various		Why was the 2010 303(d) list used to describe waterbody impairments, rather than the more recent 2012 303(d) list?	The 2010 303d list is referenced as it was the basis for a number of TMDL references, and used in the development of the prioritization of water quality conditions in the WQIPs. The WQIPs will be updated to reflect current 303d listing in future updates to these plans per the Permit. Updates to the WQIPs may include updates to highest priority conditions that will then be reflected in the goals and priority strategies. The SWRP is therefore an adaptive plan that will reflect these updates and new project priorities and listings.	Addressed in Draft Final Submitted 1/31
4	Beth Payne	SWRCB	4	4-2	Fig 4-1	The term "Stormwater Resource Planning Act" is not explained in the text. Is this referring to SB985? If so, then it should be replaced with "SB985" or the appropriate Water Code sections.	SB985 has been added to the figure. The Act is explained in Ch 1.	Addressed in Draft Final Submitted 1/31
5	Beth Payne	SWRCB	5.3	5-21		Water Code section 10563, subdivision (c)(1), requires a SWRP as a condition of receiving funds for <u>storm water and dry weather runoff capture projects</u> from any bond approved by voters after January 2014. Accordingly, <b>Step 1 Project Eligibility</b> should include a condition that only <u>storm water management</u> projects are eligible, assuming that this prioritization schematic is for Prop 1 funding as described throughout the SWRP.	The project eligibility criteria has been changed throughout the document to state that projects must have an element of storm water and dry weather runoff capture and water quality improvements or beneficial use benefits. This SWRP is not exclusive to Prop. 1 Stormwater funding and per the Guidelines encourages multi-benefit projects that may have habitat restoration, flooding and/or water conservation as a primary benefit, but also have a water quality and/or stormwater capture and beneficial use element. Funding under conservation type grants under Prop 1, such as through the Ocean Protection Council, require listing in a SWRP, but encourage habitat restoration with ocean water quality as an important element. This SWRP has been prepared to cover these funding sources as well.	Addressed in Draft Final Submitted 1/31
6	Beth Payne	SWRCB	5			Overall, the scoring flowcharts are hard to follow and confusing, especially Figures 5-8 and 5-9. It would be helpful to simplify the flowcharts and use an example project to fill out the flowchart graphically, from Stage 1 through Stage 3.	The scoring process is illustrated in the flow charts, but also presented in project examples in each section of Section 5.3.2, the checklist in Appendix D, and in the OPTI online system.	No edits made.
7	Beth Payne	SWRCB	5.3.2.5	5-34		The project described does not appear to be a storm water and/or dry weather runoff capture project and, as written, does not appear to be eligible for Prop 1 funding. How does this project fit into a SWRP?	We have replaced this project with a new one that includes storm water capture	Addressed in Draft Final Submitted 1/31
8	Beth Payne	SWRCB	5.5	5-39		Section <b>5.5 Data Management</b> is not very clear or detailed. What does the MS4 Permit require for data management? It may be better for this SWRP to describe the Permit's data management requirements, and then outline a suggested process for project managers to input data into OPTI and describe the kind of data that is expected to be submitted. Is OPTI publicly accessible? For projects that are not in WQIPs, what are the expectations for project sponsors/managers for data management and submittal to OPTI?	Text has been revised to incorporate the MS4 permit requirements that relate to project data. OPTI is publicly accessible but only includes project data prior to implementation (projected benefits). Post-implementation data would be collected and reported by the project applicants and used in the various plans as described in those plans (e.g. Copermittees would collect data for WQIPs)	Addressed in Draft Final Submitted 1/31
9	Beth Payne	SWRCB	7			Community outreach plan is comprehensive and well described.	Excellent, thank you	No edits made.
10	Beth Payne	SWRCB	App A	A-7		Water Code section 10562, subdivision (d)(6), requirement for new development and redevelopments is not filled out. Are there any sections in the MS4 Permit, WQIPs, or IRWM Plan that addresses this requirement? This includes LID or Green Street Ordinances.	Text added in Section 5.1.1 and referenced in Appendix A	Addressed in Draft Final Submitted 1/31
11	Harish Bagha	SWRCB	ES	1	1	Last sentence says that "project applying for Proposition 1 grant funding must be listed in the SWRP". This is true for storm water management projects only, prop 1 may be funding other projects that are not listed SWRP.	Text revised	Addressed in Draft Final Submitted 1/31

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Comment #	Commenter	Affiliation	Section No.	Page No.	Paragraph	Comment	Response to Comments	Suggested Follow-up
12	Harish Bagha	SWRCB	5.5/OPTI			Are all of the projects listed in the OPTI database storm water management projects? How does the public access the projects that are listed in the SWRP on OPTI? How are the SWRP projects differentiated from other IRWM Projects?	Projects listed in the OPTI system under the SWRP have at least one benefit as stormwater water quality and/or stormwater and urban runoff capture and beneficial use. The text has been revised and the checklist used for the OPTI system will be revised. The public can access the projects in OPTI through the link provided in footnote 1. The SWRP projects are identified as SWRP projects (rather than IRWM projects) in the OPTI system- project applicants must choose to enter their projects in as for SWRP, for IRWM, or for both. Text revised to clarify this.	Addressed in Draft Final Submitted 1/31
13	Harish Bagha	SWRCB	5.2			For projects that maximize water supply, how does a project sponsor use the water supply project opportunities analysis done in section 5.2 for developing their projects? Are the parcel maps provided and easily accessible in a useful format?	Text added to clarify how project sponsors can use the analysis. The parcel maps are provided both in this document and through the OPTI online system.	Additional analysis to quantify the volume captured and used beneficially will be determined for the parcels analyzed and the diversion opportunities identified. The results of this analysis will be incorporated into the revised Draft Final Plan to be submitted in February 28th. Text will be added in the revised plan that includes the results and how applicants will use the results.
14	Harish Bagha	SWRCB	5.2			For projects that are claiming to maximize water supply, do they get any points for being located on a parcel that was identified for potential opportunities in this plan?	Yes. Projects would receive points in Step 3, Watershed Analysis for being located on a parcel identified in Section 5.2.	No edits made.
15	Harish Bagha	SWRCB	Chapter 3 and Checklist item 6			Reference section does not provide general description of groundwater conditions.	General description added	Addressed in Draft Final Submitted 1/31
16	Harish Bagha	SWRCB	Chapter 3 and Checklist item 7			Checklist Item 7. "Plan describes the local entity or entities that provide potable water supplies and the estimated volume of potable water provided by the water suppliers" The referenced section do not provide an estimate of the volume of potable water provided by the water suppliers.	Estimates have been added	Addressed in Draft Final Submitted 1/31
17	Harish Bagha	SWRCB	Chapter 5 and Checklist item 25			Checklist item 25. "For storm water capture and use project analysis (section VI.C.2.b) Plan includes an analysis of how collectively the projects and programs in the watershed will capture and use the proposed amount of storm water and dry weather runoff." Did not see an analysis on how the proposed projects are collectively achieving capture and use of any proposed amount of storm water and dry weather runoff. Is OPTI capable of providing a summary of the benefits claimed by all of the SWRP projects?	The project table now includes metrics entered by the project applicants.	The Project Team will work with the applicants to obtain more consistent quantification of the benefits under the specified project metrics. The OPTI system will also be updated to require consistent units in order to summarize the collective benefit with regard to capture and water quality improvement and/or beneficial use of storm water and dry weather runoff. This additional information, updates to the OPTI system, and documentation of the consistency of the listed projects to the priorities to achieve the watershed goals in the WQIPs (for water quality) and SWRP (storm water capture and beneficial use) will be incorporated into the revised Draft Final SWRP to be submitted in February 28th, to the extent possible. Project quantification of listed projects may extend to the Final SWRP submittal in March.
18	Harish Bagha	SWRCB	Section 7.1.1.1 Checklist item 48			"Checklist item 48. Plan identifies specific audiences including local ratepayers, developers, locally regulated commercial and industrial stakeholders, nonprofit organizations, and the general public." The referenced section did not list local ratepayers, developers, and local regulated commercial and industrial stakeholders. Some of the information is included in the Table 2-2, checklist reference may need to be updated.	Table 2-2 reference added in Section 7.1	Addressed in Draft Final Submitted 1/31
19	Harish Bagha	SWRCB	Section 6.1, 6.4 Checklist item 38			Are there any other funding sources for implementation of the plan besides SWRCB SWGP R1 or R2 funding? Should also consider local revenue/funding sources, DWR IRWM funding, prop 1 through conservancies, urban greening program or any other funding sources. We suggest adding an additional section.	Text added	Addressed in Draft Final Submitted 1/31
20	Harish Bagha	SWRCB	Chapter 3 and 8			What happens when the WQIPs get updated and the new 2012 303(d) list adopted? Since majority of the plan references the WQIP, should an update to the WQIP trigger an update to the SWRP?	The SWRP is an adaptive plan. Updates to the water quality conditions, priorities, and goals will be documented in the WQIPs which the SWRP references. Future projects that have a water quality benefit are required to answer in the OPTI system whether they are a priority strategy in the most current version of the WQIP, which collectively meet the interim and final water quality goals. Therefore, the SWRP does not need to be updated as the OPTI system prioritizes projects based on the most current version of the WQIPs and other applicable planning documents referenced in the SWRP.	The OPTI system and checklist will be updated to specify that the current version of the WQIP or applicable plan is to be used to determine if the project has been identified as a priority in the watershed to address the stated goals for the plan. For water quality projects, the most recent version of the WQIP needs to be used to confirm that the listed project is a priority strategy listed in the WQIP for meeting the interim and final water quality goals.
21	Sean Maguire	SWRCB	Cover Page			Suggest renaming the document to San Diego County Regional Storm Water Resource Plan or similar and noting that the document was prepared for San Diego County Department of Public Works and San Diego Region MS4 Copermittees	Change accepted	Addressed in Draft Final Submitted 1/31
22	Sean Maguire	SWRCB	Cover Page			Suggest deleting the Regional SWRP diagram and replacing with a different graphic or photo. The diagram relies on information embedded in the SWRP and does not stand on its own merit.	Figure updated	Addressed in Draft Final Submitted 1/31
23	Sean Maguire	SWRCB	General			The SWRP should give credit to State Water Board Prop 1 Storm Water Planning funding as a major funding source.	Text added on cover	Addressed in Draft Final Submitted 1/31

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24	Sean Maguire	SWRCB	General			There is a lot of interplay between the SWRP And IRWMP but this is not fully described, or is attempted to be described at different places throught the SWRP. Suggest clarifying. It would be good to highlight early that the SWRP serves to actually fill a void in the IRWMP as it pertains to storm water management. For example, the call for projects is indicated will be done through the IRWM process.	The relationship between the SWRP and IRWMP is described in Section 2.5. Additional text has been added to clarify.	Addressed in Draft Final Submitted 1/31
25	Sean Maguire	SWRCB	General			The document appears to be almost entirely written for the purposes of obtaining Proposition 1 funding. While we agree this is an important factor in preparing a SWRP - we anticipate much more to be accomplished through the SWRP process.	Text has been revised to shift the focus throughout the document.	Addressed in Draft Final Submitted 1/31
26	Sean Maguire	SWRCB	General			Read through the entire plan for redundancy and repetitiveness and eliminate where possible for clarity. Some sections may also be presented out of optimal order. Read for consistency as to references to the "SWRP", "Plan" Functional Equivalent SWRP", "region", etc. Make sure key terms are defined.	Completed	Addressed in Draft Final Submitted 1/31
27	Sean Maguire	SWRCB	ES			The Executive Summary seems to focus largely on process and does not summarize the features over the SWRP overall. Some background/context as to storm water challenges in the region would benefit an uninformed reader.	Text added and revised	Addressed in Draft Final Submitted 1/31
28	Sean Maguire	SWRCB	ES-1		1	Storm water resource plans are required to obtain funding from any voter-approved bond after Jan 1, 2014. Not just Prop 1. This is incorrectly stated here, but correctly stated elsewhere in the SWRP.	Text revised	Addressed in Draft Final Submitted 1/31
29	Sean Maguire	SWRCB	ES-1		3	Define MS4.	Spelled out	Addressed in Draft Final Submitted 1/31
30	Sean Maguire	SWRCB	Section 1	1-2	3	The objective of the SWRP to prioritize projects does not truly get at the intent of the SWRP, to identify opportunities to enhance utilization of storm water as a resource. Section 1.2 should be reconsidered in this light. The scoring and ranking process should be saved for the appropriate section.	Section revised	Addressed in Draft Final Submitted 1/31
31	Sean Maguire	SWRCB		1-3	3	Its not clear how all of the regional plans really fit together. The WQIPS are introduced but more detailed discussion is not provided until later in the document, this should be corrected.	Section 4.1 and 5.1 describe the different plans and their relationships. To avoid repetition, references were added to this section to refer the reader to later sections.	The overall approach is to provide an adaptable SWRP. Existing, updated, and new plans developed to address benefit specific goals are the basis for identification, assessment, and prioritization of projects. Only the water supply benefit is addressed directly in the SWRP and this will be expanded to provide quantification and prioritization of parcels and diversion opportunitities. The results of this additional effort will be presented in the revised draft final SWRP submitted on February 28th.
32	Sean Maguire	SWRCB	1.4	1-5		Identification of projects a duplicate section with chapter 5? Consider consolidating for clarity.	Text has been revised to consolidate	Addressed in Draft Final Submitted 1/31
33	Sean Maguire	SWRCB		1-6	fig 1-3	Its not clear that all projects shown are related to storm water, nor if they all belong in the SWRP, or how they are screened. Where does the integrated analysis step happen to optimize opportunities?	Text has been revised to clarify projects must be related to storm water. The integrated analysis is covered in Ch 5	Addressed in Draft Final Submitted 1/31
34	Sean Maguire	SWRCB	1.5	1-7	2	All programmatic projects are not necessarily germane to the SWRP. For example, many water conservation programmatic projects should not be included.	Agreed. Text revised to clarify must be storm water related	Addressed in Draft Final Submitted 1/31
35	Sean Maguire	SWRCB	1.8	1-8	5	Last paragraph seems repetitive; consolidate or delete.	Paragraph deleted	Addressed in Draft Final Submitted 1/31
36	Sean Maguire	SWRCB	1.6	1-9	Fig 1-4	Consider generalizing for all funding opportunities, not just Prop 1. There is too much focus on grant funding only, versus storm water planning. See previous comments.	The purple boxes cover the general funding sources other than Prop 1. Text has been revised throughout to shift the focus away from funding only.	Addressed in Draft Final Submitted 1/31
37	Sean Maguire	SWRCB	1.8	1-11	1	The SWRP needs to address all of the SWRP Guidelines. This paragraph seems to allude to the "Mandatory elements" of the Water Code.	Text revised	Addressed in Draft Final Submitted 1/31
38	Sean Maguire	SWRCB	2.3	2-7	1	Are phase II permittees included in the WQIPS? If not, how are these addressed. This section 2.3 does not have any actual objectives included. Please revise and include quantifiable objectives for the SWRP. Reference the SWRP guidelines for additional guidance on the types of objectives.	Yes, Phase II permittees are included in the WQIPs. The objectives and strategies are described in Section 5.3 and the WQIPs. A reference has been added.	Addressed in Draft Final Submitted 1/31



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Comment #	Commenter	Affiliation	Section No.	Page No.	Paragraph	Comment	Response to Comments	Suggested Follow-up
39	Sean Maguire	SWRCB	2.4	2-9		Clarify "accept" vs. "adopting" of the SWRP. What is the intent? Also clarify on whether the IRWM will be "accepting" the SWRP or incorporating it into the IRWM.	Text changed to "adopt". IRWM will adopt as well (text edited in following paragraph)	The IRWM understanding is that the state requires a completed checklist as evidence that the Functional Equivalent (FE) plan meets the intent of the guidelines; the RWMG discussed this and recommends that a completed plan, with a regional checklist showing compliance with the guidelines, be submitted to the IRWM RWMG for acceptance. After, RWMG will craft a letter stating the plan meets the intent of the guidelines and that the SD IRWM accepts the plan.  We discussed and recommend the following: <ul style="list-style-type: none"> <li>Confirm with the state that a regional checklist will suffice as evidence of a completed FE plan, and is needed prior to submitting a final plan to the local IRWM for acceptance, as well as the state.</li> <li>Revise the draft regional checklist for the Regional SWRP to reflect any new information from public comments</li> <li>Submit the regional checklist at the February RAC meeting, and ask the RAC to direct the RWMG to conduct final review and accept the final draft/regional checklist into the IRWM plan via an acceptance letter</li> </ul>
40	Sean Maguire	SWRCB	5.1.4			Its not clear how all the environmental plans would result in eligible storm water projects, necessarily.	Text added to clarify	Addressed in Draft Final Submitted 1/31
41	Sean Maguire	SWRCB	5.1.5			It is not clear how the community plans fit into the quantative methods section. What is quantitative about this process?	The community plans identify the priorities for the watershed analysis- this is Step 3 of the quantification process. Text has been added to clarify. Actual quantified metrics are discussed in Section 5.4.2.4.	Addressed in Draft Final Submitted 1/31
42	Sean Maguire	SWRCB	5.2			Water supply opportunities. We appreciate the effort but it does not seem to be complete as there is no identification of projects nor reconciliation with existing projects, which we would expect as a tangible outcome from this effort. There is also no quantification of the benefits.	Text has been added to clarify how the analysis can be used. A more detailed assessment is planned by the County through the IRWM. Additional effort is also planned that will be incorporated into the February revised draft final SWRP.	Additional analysis to quantify the volume captured and used beneficially will be determined for the parcels analyzed and the diversion opportunities identified. The results of this analysis will be incorporated into the revised Draft Final Plan to be submitted on February 28th. Text will be added in the revised plan that includes the results and how applicants will use the results.
43	Sean Maguire	SWRCB				Prioritization of public lands - seems to be incomplete. How does public lands prioritization completed in the WQIP factor into this process ?	The prioritization of public lands for water quality focused storm water proejects was condctued in the WQIPs. This is explained throughout the document that the assessment and prioritization of projects that have a water quality focus have been completed in each WQIP per WMA. Project listed in the SWRP are prioritized by scoring higher if they have been assessed and prioritized on a watershed basis in the WQIP. See Section 5.4.3 for further discussion.	Additional analysis to quantify the volume captured and used beneficially will be determined for the parcels analyzed and the diversion opportunities identified. The results of this analysis will be incorporated into the revised Draft Final Plan to be submitted on February 28th. Text will be added in the revised plan that includes the results and how applicants will use the results.
44	Sean Maguire	SWRCB	5.3		fig 5-6	It seems like the very first question should be "is this a storm water management project"?	This question has been added	Addressed in Draft Final Submitted 1/31
45	Sean Maguire	SWRCB			fig 5-7	Why is it that a project can kicked out for not having O&M secure but there is no question about security of capital project funding? I suggest this not be a pass/fail question for eligibility, but both elements need to be addressed.	Most grants (such as Prop 1) will cover funding of construction, but not O&M. Prop 1 eligibility requires O&M funding to be secured, which is why it is included here.	Addressed in Draft Final Submitted 1/31
46	Sean Maguire	SWRCB	5.3.1			This process should not be written around only improving chances to compete for funding, but rather as a means to prioritize storm water management efforts in the region.	The project eligibility section is largely focused on grant requirements. Some text has been added to include the importance of prioritizing efforts in the region. Additionally, this comment has been addressed throughout the document.	Addressed in Draft Final Submitted 1/31
47	Sean Maguire	SWRCB			fig 5-9	How is the quantified scale and benefit of the project considered in the prioritization process?	A project receives more points for having more benefits. We were concerned that not all projects would have quantified benefits at this stage of the process (and most that were submitted do not), so we didn't think we could prioritize fairly based on the scale of the project. We focused the prioritization more on the total number of benefits and how far along the project was in development (so points for even having calculated the metrics period). The quantified metrics will now be included in the project table, for reference, but it does not feed into the scoring. Scale is addressed through the Watershed Analysis step 3 and scoring. If a project is listed as a priority by meeting benefit and watershed specific goals in an existing plan that has already assessed projects quantitatively then the project scores higher.	Addressed in Draft Final Submitted 1/31
48	Sean Maguire	SWRCB			fig 5-10	Consider whether a flood management project should have equal weight with a WQIP project when it may not be storm water resource focused. Similar comments apply to Figure 5-12 re: community benefits.	We've added a project eligibility question to ensure all projects are storm water resources focused. Additionally, if a project is included in a WQIP, it receives additional points in Step 3- Watershed Analysis.	Addressed in Draft Final Submitted 1/31
49	Sean Maguire	SWRCB	5.3.3			See previous comments regarding how the quantified analysis of project benefits is conducted and incorporated.	The quantification of projects occurs in Step 2- Project Benefit Metrics. Step 3 is a spatial prioritization based on quantification done at the watershed level in different documents (WQIP, IRWM, etc).	No edits made.

**Table D1. Comments on the DRAFT SWRP**

Comment #	Commenter	Affiliation	Section No.	Page No.	Paragraph	Comment	Response to Comments	Suggested Follow-up
50	Sean Maguire	SWRCB	5.4	5-39		The list of projects seems incomplete and does not represent a complete analysis or compilation of storm water management opportunities, either known or projected in the county. Projects cannot be prioritized when the only represent a small fraction of the actual projects that exist. What do the project benefits attain relative to the plan goals, once established? If the project list is "living" as proposed, how will plan success be measured? No time schedule is provided for plan implementation.	Projects are submitted by project applicants- the plan does not develop projects, but prioritizes efforts throughout the region. The proposed projects can still be prioritized against each other to help the region/state choose the best projects to implement. Project metric results have been added to the project table to track progress toward goals. The overall projects are contained in each of the watershed and regional plans which have specific goals per benefit type. For the SWRP, project must has as a element either storm water / dry weather runoff water quality and/or water resource benefits. The SWRP has listed the priority strategies that are presented in the WQIPs and the SWRP prioritizes projects if they are consistent with these priorities that have already been assessed to meet the water quality goals. For storm water as a resource projects, the SWRP includes project opportunities as a basis to develop and assess and prioritize these type of projects. The tools provided for water resource benefit can be by project sponsors to either develop or augment their water quality or other benefit area project.	Please refer to previous responses on the planned additional analysis of listed project quantification, updates to the OPTI system, and quantification of the water supply projects that will be incorporated into the revised draft final SWRP to be submitted on February 28th.
51	Sean Maguire	SWRCB	6.4	6-2		The plan implementation strategy should look far beyond solely conducting a call for projects for grant funding. This needs to be expanded.	Since this is a functional equivalent plan, the SWRP relies on other documents for implementation strategy. Refer to WQIPs, IRWMP, and others for strategy.	Addressed in Draft Final Submitted 1/31
52	Sean Maguire	SWRCB	8.1	8-2	Fig 8-1	The process seems to be focused predominantly on grant funding only. Please revise per earlier comments.	This figure illustrates the funding process. However, the text has been revised to shift the focus away from funding only.	Addressed in Draft Final Submitted 1/31
53	Sean Maguire	SWRCB			Appdx A	Use latest version of the Self-Certification and Checklist.	Revised to use the latest version	
54	Harish Bagha	SWRCB				An overarching comment would be that the draft SWRP missed the opportunity to identify and quantify how the proposed projects and program are collectively resulting in addressing the regional goals and objects the plan.	The project table now includes metrics entered by the project applicants	Please refer to previous responses on the planned additional analysis of listed project quantification, updates to the OPTI system, and quantification of the water supply projects that will be incorporated into the revised draft final SWRP to be submitted on February 28th.
55	Sheri McPhearson	County of San Diego			Appendix C-6	HA labeled incorrectly	Figure has been revised	Addressed in Draft Final Submitted 1/31
56	Helen Davies	City of Escondido	ES	5		as projectS are	text revised	Addressed in Draft Final Submitted 1/31
57	Helen Davies	City of Escondido	ES	5		replace exiting with existing	text revised	Addressed in Draft Final Submitted 1/31
58	Helen Davies	City of Escondido	2-3	2-8	Table 2-4	It would make sense to list the stakeholders in alphabetical order. There does not seem to be a logic in the order (see Carlsbad WMA).	table revised	Addressed in Draft Final Submitted 1/31
59	Helen Davies	City of Escondido	3.3.3.2	3-14	Table 3-7	Riparian habitat is the priority water quality condition in Escondido Creek.	This is included in the second row which lists "all water bodies within the WMA" per Table 7 of the updated WQIP.	Addressed in Draft Final Submitted 1/31
60	Helen Davies	City of Escondido	3.3.5	3-16		Is the sentence describing urbanization and development leading to habitat degradation necessary? How does it help us? Delete	sentence deleted	Addressed in Draft Final Submitted 1/31
61	Helen Davies	City of Escondido	3.4.6	3-22	First line	See previous comment. Does this discussion on urbanization help? Delete.	This section describes the watershed processes for San Dieguito, and urbanization of the watershed is a major process that has impacted water quality. For this reason, we include this sentence here.	No edits made.
62	Helen Davies	City of Escondido			Figure 3-18	Escondido is incorrectly represented and our wastewater treatment plant (HARRF) is missing. Both our water service and wastewater service areas are wrong. Please correct. Our correct service areas are presented in the attached figures.	Figure 3-18 and 3-24 updated to reflect service areas and HARRF	Addressed in Draft Final Submitted 1/31
63	Helen Davies	City of Escondido			Figure 4-1	JRMPs are jurisdictional, not regional. Where does the MS4 permit fit in?	Figure updated	Addressed in Draft Final Submitted 1/31
64	Helen Davies	City of Escondido	4.2.3	4-9		Update per approved version of WQIP. Riparian habitat for Escondido Creek for example.	This section has been updated with 2016 WQIP information. The References section has also been updated to replace the 2014 WQIP reference with the 2016 WQIP reference.	Addressed in Draft Final Submitted 1/31
65	Helen Davies	City of Escondido	4.2.3	4-9		Add qualifier that this is a snapshot. Facilities open/close all the time.	Note added below table explaining the high turnover of facilities in the hydrologic area.	Addressed in Draft Final Submitted 1/31
66	Helen Davies	City of Escondido	4.2.4	4-11	Table 4-7	Qualifier that facilities open/close would be applicable here too.	Note added below table explaining the high turnover of facilities in the hydrologic area.	Addressed in Draft Final Submitted 1/31
67	Helen Davies	City of Escondido	5.1.1.	5-4	Header	Water Quality IMPROVEMENT Plans. Correct	No, this is referring to any and all water quality plans, including WQIPs, WMAAs, WQE and others. Text added to clarify.	Addressed in Draft Final Submitted 1/31
68	Helen Davies	City of Escondido	5.2.1	5-8		What about the City of Escondido Hydraulic Study? This did a similar exercise and identified 10 locations in the City where it would be most beneficial to capture stormwater for infiltration or irrigation reuse. This was sent to you during the call for projects: <a href="http://www.escondido.org/storm-water-program.aspx">http://www.escondido.org/storm-water-program.aspx</a>	This SWRP does not capture all of the reports that are out there. If a project is prioritized in the Escondido study, the project could identify this study in the checklist and the project would receive points in Step 3.	No edits made.
69	Helen Davies	City of Escondido	5.2.2	5-8		See above comment.	This SWRP does not capture all of the reports that are out there. If a project is prioritized in the Escondido study, the project could identify this study in the checklist and the project would receive points in Step 3.	No edits made.
70	Helen Davies	City of Escondido			Figure 5-2a	The Country Club Golf Course in Escondido has closed and is rezoned for other uses. Remove from this figure.	Figure updated	Addressed in Draft Final Submitted 1/31

**Table D1. Comments on the DRAFT SWRP**

Comment #	Commenter	Affiliation	Section No.	Page No.	Paragraph	Comment	Response to Comments	Suggested Follow-up
71	Helen Davies	City of Escondido			Appendix C	Why is the Spruce St Channel Improvement (tributary to Escondido Creek) not included here? Include.	Need to discuss the need to include this project with the County	Need to discuss the need to include this project with the County
72	Helen Davies	City of Escondido		P266		Why is Escondido (and others) missing from this list for Carlsbad? We have some significant strategies including a creek restoration project.	Jurisdictions updated. The strategies for Carlsbad are included in Section 2.4.2 of the WQIP as stated.	Addressed in Draft Final Submitted 1/31
73	Helen Davies	City of Escondido		P275		Why the repetition in figures? This goes on until p284.	This is part of the worksheets and what is included online in the OPTI system. So certain figures are included in the main report and online, thus included twice.	No edits made.
74	Helen Davies	City of Escondido		P275		Remove Escondido Creek Country Club, no longer a golf course. Rezoned for other purposes.	Figure updated	Addressed in Draft Final Submitted 1/31
75	Helen Davies	City of Escondido		P300		Why is Spruce St Channel Improvement Project not included? The project was in the database. Please include.	The project checklist was blank for this project.	RMC to coordinate with Escondido to get info entered correctly.
76	Helen Davies	City of Escondido		P301		All three of Escondido's projects are in the Carlsbad watershed. Please correct.	This has been updated	Addressed in Draft Final Submitted 1/31

**Table D2. Comments on the DRAFT Final SWRP**

Comment #	Commenter	Affiliation	Section No.	Page No.	Paragraph	w	Response to Comments
1	Diane Nygaard	Preserve Calavera	Section 2 - Outreach/Collaboration			San Diego is unique among most large MPOs in that we have about 400 environmental NGO's, but the vast majority have zero paid staff. This leaves us with limited capacity to engage in large scale efforts like this. The list of participants includes two well respected NGOs that do have paid staff and it is clear they have well represented the particular areas they represent. But what about the rest of us and the vast amount of the county that they do not represent? You need to put more effort into getting input from this key stakeholder group as it is clear the final product is diminished because you have not adequately included the balance that having more/broader NGO input would have provided.	We acknowledge that there are many non-profit organizations in the region that have an interest in stormwater capture and reuse, water quality improvement, and habitat protection. We intentionally chose to use the San Diego Integrated Regional Water Management (IRWM) Program and its Regional Advisory Committee (RAC) as a forum for communicating to stakeholders about the SWRP because many of those non-profit organizations are engaged in the IRWM Program. The similarities between the SWRP and the IRWMP, and that they are both grant programs, make this a common sense approach. We hoped that by using the IRWM stakeholder list that as many regional non-profits and stakeholders as possible would be informed about the SWRP and able to participate through an existing stakeholder engagement effort. If you are not already on the IRWM stakeholder list, please contact us at SDIRWM@woodardcurran.com.
2	Diane Nygaard	Preserve Calavera	Section 3 Carlsbad Watershed		Table 3-7 and 3-8	Riparian habitat is identified as a priority concern for all watersheds within the CHU, but is only called out on Table 3-8 for Escondido Creek. The Carlsbad Watershed Network made numerous comments about this issue in the WQIP process- but that input was basically ignored by the Coppermittees. It is not surprising that it also is basically ignored here. Please note that for the only 2 subwatershed that have completed watershed management Plans in this CHU (Loma Alta and Agua Hedionda) both included analysis of the importance of key acquisitions and improved creek buffers in protecting water quality. Protection of riparian habitat throughout the CHU needs to be a high priority. Failure to recognize this also carries into the identified projects.	This SWRP is a functionally equivalent document, which means it draws from other watershed and regional documents that have undergone stakeholder input and review, such as the WQIPs. The SWRP has used the table referenced from the WQIP as it has undergone stakeholder review and has been approved by the Regional Board. The goal of the SWRP is for project leads to partner with stakeholders including NGOs in each watershed to identify and develop multi-beneficial stormwater capture projects that can apply for funding under Proposition 1. The SWRP applies a scoring system to projects that encourages this watershed collaboration. Your identification of the importance of creek buffers is reflected in the project criteria that are used in scoring projects. We encourage your organization to partner with other in the Carlsbad watershed to develop and submit projects through the online SWRP OPTI system.
3	Diane Nygaard	Preserve Calavera	Section 3.3.5 and Figure 3-19 Parks and Habitat		Figure 3-19 Parks and Habitat	I did not find anything that explained why only the 6 listed species were targeted. That is an important criteria and further explanation as to how that was determined is needed to support the actions in the Plan.	Per US Fish & Wildlife, "critical habitat" is defined in the Endangered Species Act (ESA), and is a "specific geographic area(s) that contains feature essential for the conservation of a threatened or endangered species and that may require special management and protection." An area may be designated as critical habitat if it has the characteristics required for the species' life cycles, regardless of whether the species is currently present in the area. At this time, not all listed endangered and threatened species have designated critical habitat; as of January 2015, 704 species, of the more than 1,500 listed species had designated critical habitat ( <a href="https://www.fws.gov/endangered/what-we-do/critical-habitats-faq.html">https://www.fws.gov/endangered/what-we-do/critical-habitats-faq.html</a> ). Only designated critical habitat was mapped, and does not indicate the presence or absence of a listed species. All listed species are protected under the ESA, even if critical habitat has not yet been designated. For more information on critical habitat, refer to US Fish & Wildlife's Critical Habitat Fact Sheet, available here:
4	Diane Nygaard	Preserve Calavera	Section 3.3.5 and Figure 3-19 Parks and Habitat		Figure 3-19 Parks and Habitat	Also throughout there is no mention of the MHCP- the adopted conservation plan that covers most of the CHU. The figure shows boundaries of the MCSP (which is very small) but fails to show the MHCP or discuss it in the text.	<a href="https://www.fws.gov/midwest/Endangered/saving/CriticalHabitatFactSheet.html">https://www.fws.gov/midwest/Endangered/saving/CriticalHabitatFactSheet.html</a>
5	Diane Nygaard	Preserve Calavera	Section 3.3.5 and Figure 3-19 Parks and Habitat		Figure 3-19 Parks and Habitat	It also is unclear why such a small number of actual parks and critical habitat is depicted on the map. For example the Buena Vista Creek Ecological Reserve certainly seems like it should be included- on an impaired section of creek and immediately above the lagoon. Oak Riparian Park in Oceanside includes key riparian habitat in the AH sub-watershed. Numerous existing parks are not included.	Oak Riparian Park and Buena Vista Creek Ecological Reserve have been added to the map. The data included in the map is from SANGIS, so the map displays everything that is included in that database.
6	Diane Nygaard	Preserve Calavera	Section 3.3.5 and Figure 3-19 Parks and Habitat		Figure 3-19 Parks and Habitat	And I could not see several areas designated as critical habitat in the MHCP. It would seem like at a minimum all riparian and critical habitats should be shown.	The MHCP boundaries have been added to the figure. See response above regarding the mapping of designated critical habitat for listed species.
7	Diane Nygaard	Preserve Calavera	Project List			Few groups have the capacity to provide the kind of information required by the checklist to submit a project- but that does not mean that there are not a lot of projects worthy of consideration. I urge you to put some real effort into supporting broader involvement of NGO's, and the necessary technical support for small organizations to prepare applications and get worthy projects considered. The Coppermittees have no incentive to provide such support is it competes for their projects. But our local watersheds are crying out for this kind of help. The guidance from the state makes it clear that all stakeholders are supposed to be part of the process. It really is your challenge to figure out how to make that happen.	As long as a project responds to the project eligibility questions, it will be included in the SWRP project list. Additionally, all of the information included in the checklist are also required for a Prop 1 grant application, so the goal of the checklist is to help a project sponsor prepare for submitting a grant, rather than eliminate any projects. The more information a project has, the more competitive it will be at the state level. Appendix G provides worksheets to help project sponsors calculate project metrics and is designed to assist project sponsors in the checklist process. The SWRP applies a scoring system to projects that encourages this watershed collaboration. We encourage your organization to partner with other in the Carlsbad watershed to develop and submit projects through the online SWRP OPTI system.
8	Wbaldo Arellano	Public Works D	Section 3.9 Tijuana		3rd paragraph	Correction needed to Rio Alomar-change to "Rio Alamar".	name revised
9	Harish Bagha	water boards	section 1-1		2nd	Revise the first sentence in the second paragraph for section 1-1 as follows: "...promulgate <del>regulations</del> -guidance for compliance..."	revised
10	Alex Yescas	Harris & Associates	Appendix I			changes to project metrics in Appendix I	metrics updated