

APPENDIX E

Public Participation

Appendix E

2nd Draft CHOLLAS CREEK DISSOLVED METALS TMDL IMPLEMENTATION PLAN

Comment Period from May 11, 2009 to May 25, 2009

Response # / Reference		Comment	Response
1.	-	May 2009 Stakeholder Meeting – Strive to be consistent with the reported and collected data across the monitoring process.	The Monitoring Plan presented in Appendix C will provide the framework to be used for the next 20 years. Also see Response No. 12.
2.	-	May 2009 Stakeholder Meeting – Consider the protection of groundwater resources (and future water reuse/recharge) when siting infiltration type BMPs.	Groundwater resources have been incorporated into the Implementation Plan. See Section 3.2.2, <i>Tier II Best Management Practices Opportunities and Constraints</i> , Table C-1 of Appendix D, and Table E-1 of Appendix D. The State Water Quality Control Board has established water quality standards for groundwater infiltration. These standards will be met in the design of these types of projects.
3.	-	May 2009 Stakeholder Meeting – How will Dischargers address the large percentage of non-English speakers in the Chollas Creek Watershed?	Dischargers will consider the cultural diversity of the watershed in developing their activities, particularly education and outreach efforts. The Think Blue program includes educational materials in many languages that capture the diversity of our communities.
4.	-	May 2009 Stakeholder Meeting – Are any activities in the watershed that may be exempt from the ban “for urban pesticides” (Zoos, Cemetery, Nursery, Police Kennel or Horse Stables).	The use of Diazinon must be registered for all exempted uses. These exemptions are typically only granted for agricultural use (there are only three acres of agriculture in the Chollas Creek Watershed). The specific uses identified by Stakeholders are not exempt from the ban and therefore should not use Diazinon-based pesticides.
5.	-	May 2009 Stakeholder Meeting –Please identify how earlier comments on galvanized zinc fencing have been incorporated into the Implementation Plan.	See the description for Product Substitution, a Tier I Watershed Activity presented in Table C-1 of Appendix D (page C-1). Examples of potential products for substitution are listed in Intermediate Step 3 in Table E-1 of Appendix D (page E-1), including zinc in galvanized metals. The City of San Diego identified the "Assessing Opportunities for Product Substitution" watershed activity (City of San Diego, Appendix B.3-8). Section 3.2.1, <i>Tier I Best Management Practices Opportunities and Constraints</i> , of the Implementation Plan also describes briefly Tier I activities. The Tier I Code Modification watershed activity is applicable for this type of source. Dischargers have different processes for implementing source control programs (local, regional, state-wide, and federal). For example, Dischargers may be able to implement product substitution activities or education/outreach, but an ordinance level ban may not be appropriate.

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		<p>At this time, Caltrans does not have studies completed or in progress to verify the amount (if any) of zinc coming off metal beam guardrail or chainlink R/W fencing.</p> <p>Not applying the galvanized coating on such objects would result in tremendous maintenance effort resulting in enhanced corrosion and affecting the structural integrity of these safety elements, especially in relatively close proximity to a marine environment. More importantly, continuous maintenance of these items is a great safety concern for Caltrans maintenance staff. Caltrans recently replaced approximately 9 linear miles of metal beam guardrail (double side) in the median with concrete barrier along SR-94 between I-5 and SR-125 due to multiple hits by the traveling public. This minimized exposing Caltrans maintenance crews to live traffic to repair said guardrail.</p> <p>Caltrans believes that the zinc contribution from Caltrans 5% land use area in the watershed to Chollas Creek is generated from the vehicle tires traveling the freeways in the watershed. Caltrans will be incorporating treatment BMPs throughout the watershed as feasible to address dissolved zinc, lead and copper issues in the creek as shown in Caltrans Watershed Activity List in the Implementation Plan (Appendix B.2). Caltrans has also ongoing studies, and as with all new BMPs, if proven to be successful, will be applied in the watershed. An example of such studies is the investigation of porous friction coarse overlays.</p>
6.	-	<p>May 2009 Stakeholder Meeting – Will the Implementation Plan achieve an 80% load reduction within 10 years?</p> <p>All Dischargers have the goal to be in compliance with the Dissolved Metals TMDL and therefore achieve an 80% load reduction by October 22, 2018 through the iterative approach (see Section 1.4.4 and Table 4-1 for the schedule and Figure 3-1 for the anticipated percent load reductions to be achieved using the Integrated TMDL Watershed Approach). The iterative approach was developed to meet the compliance requirements while allowing the Dischargers to revise activities as each type of activity is proven effective or ineffective.</p>
7.	-	<p>May 2009 Stakeholder Meeting – Are residents framed in the Implementation Plan as the source of pollution?</p> <p>As presented in Table 2-2, <i>Priority Sources of Pollutants</i>, residential activities are identified as one of 15 priority sources of pollutants. The Copermittees under the San Diego region's Municipal Storm Water Permit prepared this evaluation based on the data presented in</p>

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			Table A-2, A-3, A-4, and A-5 in Tool A of Appendix D (pages A-3 to A-6).
8.	-	May 2009 Stakeholder Meeting – Which dischargers are not Permittees?	The U.S. Navy and Caltrans are not Copermitees under the San Diego region’s Municipal Storm Water Permit.
9.	Organization of future stakeholder meetings and comments	May 2009 Stakeholder Meeting – Stakeholders recommended the creation of a “Think Blue coalition” email address. Emailing comments to an employee of the City of San Diego may provide the wrong impression.	This recommendation will be considered during future, ongoing coordination efforts, including the establishment and update of a TMDL Implementation Plan project website. In the interim, comments sent to the City of San Diego’s project manager, Drew Kleis (akleis@sandiego.gov), will be distributed to the Discharger group.
10.	Organization of future stakeholder meetings and comments	May 2009 Stakeholder Meeting – Stakeholders would like to: stay informed of progress in Implementation Plan implementation and assessment, provide input on effectiveness assessment, review monitoring results, weigh in on community-based projects, identify opportunities/needs (funding, etc). Stakeholders also require a centralized information source.	This recommendation will be considered during future ongoing coordination efforts.
11.	Organization of future stakeholder meetings and comments	May 2009 Stakeholder Meeting – Future stakeholder update and assessment meetings should occur bi-annually to start and then be organized using an adaptive approach in the future.	This recommendation will be considered during future, ongoing coordination efforts, including the establishment and update of a TMDL Implementation Plan project website.
12.	Organization of future stakeholder meetings and comments	May 2009 Stakeholder Meeting – Any data provided on the website should be accessible to the public and universal (compatible between different types of data).	This recommendation will be considered during future, ongoing coordination efforts, including the establishment and update of a TMDL Implementation Plan project website. The monitoring plan provides a framework for assessment and data to be collected. Dischargers will endeavor to create a similar level of consistency for watershed activity assessment, and endeavor to make watershed activity data compatible with other types of data.
13.	-	Stakeholder Comment (submitted by email) - Tier I misses an important issue. It is essential that ALL staff are aware of this water quality in the Chollas Creek Watershed (TMDL and TMDL	This type of in-house education has already been called out as a potential watershed activity. It falls under the Tier I Targeted Behavioral Training (to Staff) activity identified in Tools C and D (Appendix D).

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		Implementation Plan) and are working to both ameliorate the current issues and to stop any further pollutants. This education needs to be across board, so that we can begin working cohesively to make this happen as opportunities present themselves.	The City of San Diego will consider incorporating Chollas Creek TMDL specific information into materials and training etc. for staff, as appropriate.
14.	-	Stakeholder Comment (submitted by email) - The City of San Diego needs to add to both its multi-disciplinary review, and its environmental document requirements, a review by someone with knowledge of the RWQCB's order regarding the Chollas Creek.	Staff from the City of San Diego Storm Water Department coordinate closely with Development Service Department on providing training & educational materials for plan checkers to enhance staff knowledge levels of Storm Water Regulation. More emphasis will be placed specifically on the Chollas Creek Dissolved Metals TMDL. In addition to training, the City of San Diego is constantly improving the plan check and permitting process through this coordination effort.
15.	-	Stakeholder Comment (submitted by email) – The City of San Diego needs to add criteria to its prioritization criteria for its Capital Improvements Project (CIP) list that gives points to a project that can help the city reach its goal of 80% clean up within ten years. Currently, projects that could create a huge difference in pollutants in the Chollas Creek do not seem to ever reach the top of the list.	The current City of San Diego prioritization system has criteria for regulatory compliance/mandate which addresses this comment. There is a CIP Prioritization form that gets filled out for each CIP project. This form consists of a list prioritization criteria. If the project is planned to help meet compliance or mandated by a regulatory requirement, this criteria is added to the overall project's score. However, even if a project gets a higher prioritization score it still has to compete against other projects for funding. Please note that the 80% reduction goal is a cumulative effort by all the Dischargers named in the adopted Order including the Cities of La Mesa, Lemon Grove and San Diego, County of San Diego, California Department of Transportation (Caltrans), U.S. Navy, and San Diego Unified Port District.
16.	Section 4.1.3	Stakeholder Comment (submitted by email) - Please share the information from CalTrans that bioswales can remove heavy metals. I hope it can be implemented in sufficient quantity to make a difference.	In 1997, Caltrans developed a Pilot structural BMPs Program in the San Diego and Los Angeles Caltrans Districts as a result of litigation between Caltrans and USEPA, San Diego Coastkeeper (formerly known as San Diego Baykeeper), Santa Monica Baykeepers and the Natural Resources Defense Council (NRDC). Six bioswales were sited, constructed and monitored as part of the pilot program in San Diego and Los Angeles. Two are located in San Diego and four in Los Angeles. Detailed information about the bioswales siting, design, construction, maintenance, performance and cost are found in Chapter Seven, page 162 (Biofiltration Swales) of the Pilot Report found at: http://www.dot.ca.gov/hq/env/stormwater/special/newsetup/_pdfs/new_technology/CTSW-RT-01-050.pdf

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			<p>To meet the Dissolved Metals TMDL requirements Caltrans will be using a combination of source control and structural BMPs. Caltrans is also an active member of the Brake Pad Partnership.</p> <p>Although Caltrans' right of way is minimal in the watershed (approximately 5%) Caltrans has already started efforts to meet the TMDL requirements through Public Education. In addition, the Caltrans NPDES/Storm Water compliance unit has been working with designers to ensure that major projects currently in the planning/preliminary design phase that discharge to Chollas Creek are incorporating structural BMPs.</p>
17.	-	<p>Stakeholder Comment (submitted by email) - Partnering with the water conservation efforts being conducted by the Dischargers should be explicitly included in the plan. The City of San Diego Water Department water conservation program fits in with the TMDL plan to reduce runoff and pesticide use. Promoting native plants reduce need for water and pesticides, public outreach with residential water survey program and commercial landscape surveys, are examples that have direct benefits for the TMDL program.</p>	<p>Dischargers are seeking out water reuse opportunities as stated in Section 3.2.2 of the Implementation Plan (also see Response No. 21 and No. 46).</p> <p>The City of San Diego Storm Water Department is proposing to partner with the City of San Diego Water Department in a project entitled "Outdoor Water Conservation and Nuisance Flow Reduction Using Smart Irrigation Hardware and Water Harvesting Systems." This project will be implemented in partnership with the City's Water Department and will involve a demonstration project for "smart" irrigation systems and potentially rain barrels.</p>
18.	-	<p>Coastkeeper Comments - The document's coverage of techniques for meeting the TMDL requirements is quite thin. While this limited coverage might be appropriate within the document's scope, there should be at least an overview presentation of the anticipated techniques. Low impact development (LID) is mentioned but without a broad sense of how the authors conceive its meaning. To the extent that LID comes up, the document continues, like previous reports, to convey the notion that it is mostly a function of infiltrating runoff; and if there are suspicions that infiltration is limited, then a LID strategy is proportionately limited. First, LID</p>	<p>Information associated with LID techniques has been expanded within Section 3.2.2. The descriptions of the LID GreenStreet, GreenLot, and GreenMall concepts have been expanded in Appendix D Tool C to discuss evaporation, evapotranspiration, and incidental infiltration that may occur in filtration LID BMPs where they have not been lined. Water harvesting and reuse activity types are detailed separately in Tool C; however, projects when implemented may involve multiple activity types to maximize pollutant reduction potential.</p> <p>The City of San Diego added an activity to its Watershed Activity List (Appendix B.3) that evaluates the benefits that may be observed from evapotranspiration, evaporation, and incidental infiltration associated with infiltration BMPs for LID features. Also the City of San Diego is currently evaluating the urban runoff benefits associated with street</p>

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	<p>should be regarded as a three-legged stool involving infiltration, evapotranspiration, and harvesting water for some use. Also like preceding documents, the Implementation Plan still submerges the second and third elements, which can greatly expand the volume of water subtracted from the surface runoff component on the output side of the water balance. Secondly, judgments of infiltration potential based on crude soil survey information frequently underestimate the amount of water loss that actually occurs under site-specific conditions and when a soil is engineered with amendments to increase soil storage and, hence, opportunities for both infiltration and evapotranspiration.</p> <p>I performed an analysis, previously provided to the City and included with these comments as Attachment A, showing that Southern California has considerably greater potential to reduce the discharge of contaminated urban runoff through evaporation in LID stormwater management practices than other locations in the United States that have already adopted and mandated those practices or are considering regulatory proposals to do so. Furthermore, most locations can infiltrate much or even all runoff produced by typical water quality design storms and need not rely on evaporation. In addition, harvesting rainwater for beneficial uses can further subtract from surface discharge. California is unique in having some reclaimed water distribution systems in place. These systems could be expanded to take harvested rainwater, and many unexplored opportunities exist to put runoff to good purposes to help solve the state's water supply problems.</p>	<p>trees. This study has been added to the Watershed Activity List.</p>

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19.	Figure 3-1	Coastkeeper Comments - Removing the potential Rec-1 beneficial use designation for Chollas Creek is given as a legislative source control practice. A source control practice is, by definition, a means of reducing the production of pollutants, certainly not an outcome that would be produced by this regulatory action. This inappropriate measure should be removed from the plan and decided upon in a separate public process conducted by the Regional Water Quality Control Board.
20.	Table 3-2	<p>Coastkeeper Comments - Earlier I submitted comments to the City regarding the design storm selection. These comments apply to this table and are presented again with this statement as Attachment B.</p> <p>The Rec-1 designation language has been removed from the Figure and the activity has been removed from the City of San Diego's Watershed Activity List (Appendix B.3).</p> <p>To address the suggested text change which expanded the working definition of LID to include evapotranspiration and harvesting for beneficial use, the LID concept was clarified in appropriate sections of the Plan (Section 3.2.2 and Tool C of Appendix D).</p> <p>To address the suggested text change that proposed compensatory treatment for projects that did not treat the 85th percentile storm, Footnote 1 to Table 3-2, <i>Design Storm Approaches for Capital Improvement Projects that are Implemented as Total Maximum Daily Load Compliance Activities</i>, was added to clarify that the intent of the design storm objective was to provide a recommended level of treatment in areas and to the extent that Tier I and Tier II BMPs are not able to achieve the required pollutant reductions.</p> <p>The suggested text changes to "Aggressive Approaches" were incorporated into Table 3-2.</p>
21.	Figure 3-2 Section 3.2.3	<p>Coastkeeper Comments - Bioretention units, swales, etc. should not have a liner unless there is a specific, justifiable reason to do so (e.g., to separate the treatment system from a high groundwater table, to prevent the percolation of water through a contaminated deposit). Without such a reason the bed of the facility should be left open to gain whatever infiltration benefit that might occur, which could be larger than expected.</p> <p>Section 3.2, <i>Tier II Best Management Practices Opportunities and Constraints</i>, Figure 3-2, <i>Example of Modified Low Impact Development Design – Green Lot Low Impact Development Parking Lot Schematic</i>, and Figure C-1 of Appendix D, were updated to clarify that the synthetic liner is to be used only where necessary.</p>
22.	Section 5.4	<p>Coastkeeper Comments - To examine the hypothesis advanced in the preceding comment, I</p> <p>The City of San Diego added additional analysis of evapotranspiration, "incidental" infiltration, and harvesting techniques to its Watershed</p>

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	recommend as an additional special study the investigation of water loss through infiltration plus evapotranspiration in unlined bioretention units and swales.	Activity List (Appendix B.3). Specifically, analysis of these techniques was added to several planned or ongoing LID projects. In addition, an ongoing study analyzing the water quality, water conservation and maintenance opportunities and constraints of street trees was added to the City's Watershed Activity List.	
23.	Appendix C, Section 4.3	Coastkeeper Comments - It is stated that monitoring will proceed up to 8 hours as long as the hydrograph continues to decline. Will monitoring continue longer than 8 hours if there is no clear pattern of hydrograph decline?	Yes, sampling will continue until there is clear evidence from flow monitoring that the hydrograph is declining and representative samples have been taken of the rise, peak and fall of the hydrograph. The text will be modified to make this clearer.
24.	Appendix C, Section 4.4	Coastkeeper Comments - The QA/QC plan summarized here is quite thin and missing some important elements. Is there a more complete plan or under development?	A QA/QC plan was prepared under the Prop 13 Water Quality Enhancement and PRISM grants which satisfy Monitoring Order 2004-0277. The plan is Surface Water Ambient Monitoring Program (SWAMP) compatible and, though not prepared specifically for this monitoring program, the plan still applies.
25.	Glossary	CREAC Comment No. 1 - Recommended creating distinctions between "Co-permittee Dischargers", "Permittees Dischargers", "TMDL Participants", and "Non-permitted Dischargers" and including more Glossary definitions of terms used in Implementation Plan.	The definition for "Dischargers" now identified which Dischargers are also Copermittees as defined in RWQCB Order No. R9-2007-0001.
26.	Maps, Figures, Tables	CREAC Comment No. 2 - Improve for readability of Maps, Figures, and Tables.	Graphics have been re-sized and formatted to improve readability.
27.	Figure 1-2	CREAC Comment No. 3 - Improve map to show all of the US Navy/US Government facilities in the Chollas watershed (Military housing Auburn Creek and Chollas Heights, US Postal Facilities, etc).	This map represents the jurisdiction of Dischargers named in the Dissolved Metals TMDL. Navy housing is mostly privatized and is not distinguished from other residential areas within the watershed for purposes of the Dissolved Metals TMDL. Other agencies not named in the 2007 version of the Dissolved Metals TMDL have not been included on this map.
28.	Figure 1-3	CREAC Comment No. 4 - Modify schedule to include future reporting and adjustment milestones.	This schedule shows the Implementation Plan development process, not the overall Implementation Plan Compliance Schedule. Figure 1-3 has been re-named to reflect the schedule's actual purpose. The schedule for milestones and programmatic phases is presented in Figure 1-15. The TMDL Compliance Schedule is presented in Table 1-4 and Table 1-5.
29.	Figure 1-4	CREAC Comment No. 5 - Modify map to show all of the US Navy/US Government facilities in the	This map was created using available data from SanGIS, SanDAG, USDA NapeOrthoimagery San Diego County 1m, and the San Diego

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		Chollas watershed (not on the waterfront). Improve map by making it a full page.	Unified Port District. Based on the pollutant-specific Threat to Water Quality ratings from the <i>Baseline Long Term Effectiveness Assessment</i> , there would be no added water quality benefit of distinguishing Naval housing from other residential areas (Weston, MOE, & LWA, 2006). Therefore, Naval housing, which consists of mostly privatized facilities, was not identified on the map. The map was re-sized as part of efforts under Response No. 25.
30.	Section 1.2.1	CREAC Comment No. 6 - There are several cemeteries (not just one). Additional language about the schools, large number of closed or abandoned landfills and the Chollas Heights Reservoir / Lake should be added to the text.	The land use percentages for cemeteries and schools were added to the Implementation Plan. Additional language regarding the Chollas Lake was added. Landfills are included in the industrial land use category as they are considered industrial facilities.
31.	Table 1-1	CREAC Comment No. 7 – Language in table is misleading and numbers should be revised.	Other agencies not named in the 2007 version of the Dissolved Metals TMDL have not been included in this table. The language used in the table and supporting text was revised for clarity.
32.	Figure 1-7	CREAC Comment No. 8 - The Chollas Lake Reservoir / Lake should be labeled as "Water".	Chollas Lake has been identified as "Water" on this and other maps.
33.	Section 1.2.2	CREAC Comment No. 9 - Please explain the source of the 13.5" average rainfall data reported.	The 13.5" rainfall average listed in the 2 nd Draft Implementation Plan was developed from a model that considered rainfall averages at Lindbergh Field. Instead of listing modeled rainfall averages, the Implementation Plan was updated to reference the recorded average annual rainfall at Lindbergh Field (10.23 inches). This historical record began in 1909 and represents the best data currently available in the vicinity of the Chollas Creek Watershed.
34.	Section 1.2.3	CREAC Comment No. 10 - Please discuss possible sites for re-use and permeable infiltration treatment of storm water, such as the Chollas Lake Reservoir and the numerous cemeteries.	Language about project siting was incorporated in to Section 3.2.2. In 2009, the City of San Diego completed the Parcel Evaluation for BMP Implementation Study. This report evaluates all properties the City owns and identifies opportunities for implementation of Tier II and Tier III BMPs using the types of criteria outlined in Section 3.2.2. The County Department of General Services has identified facilities within the watershed that would be appropriate for infiltration projects. Note: the Cemeteries are privately owned and therefore would not be available for use by County for infiltration projects.
35.	Figure 1-8	CREAC Comment No. 10 - Please explain the "No Data" flag.	This map was created using available data from the Soil Survey Geographic (SSURGO) Database for San Diego County. This data

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			source has been referenced on the map. Soils which have not been classified in this database have been identified as "No Data."
36.	Section 1.2.3	CREAC Comment No. 11 - This section needs to be revised to indicate that the storm water is incomplete and aging.	Additional language about deferred maintenance was added to this section. The City of San Diego will be evaluating deferred maintenance through ongoing infrastructure evaluation and mapping projects for the Chollas Creek Watershed, and other watersheds (see Appendix B-3).
37.	Figure 1-9	CREAC Comment No. 12 - The Chollas Lake Reservoir / Lake should be labeled as "Water".	The legend has been updated to identify "Water."
38.	Figure 1-10	CREAC Comment No. 13 - The creek and canyon are mis-identified as "Manzanita Canyon".	The location reference was changed to "City Heights neighborhoods of Castle and Azalea Park (Lexington Creek tributary)".
39.	Section 1.2.4	CREAC Comment No. 14 – The sentence "Much of the creek has been channelized and concrete lined." Misleads the reader and should include more specific language re. channelization in Chollas Creek.	This sentence has been removed from the text. A definition of Channelization has been added to the Glossary.
40.	Figure 1-12	CREAC Comment No. 15 – The map does not accurately depict the 3.5 mile limits.	This map was created using data provided by the State Water Resources Control Board for the 2006 303(d) Listings, as indicated on the map legend. The State Water Resources Control Board is the agency that lists impaired water bodies in the State on the 303(d) list.
41.	Section 1.3.1.1	CREAC Comment No. 16 - The report makes a statement that "The hardness may likely be the result of the higher mineral content of the imported water that is used for irrigation and other activities that result in urban runoff." This assertion is testable by measuring the hardness in Chollas Lake which is constantly refilled with imported treated water. The hardness of Chollas Creek should be compared to the water in the Chollas Lake and the differences, if any, explained. The report discounts the "13.5 inches" of rain fall.	<p>The California Toxics Rule WQOs for dissolved copper, lead, and zinc are evaluated at the two mass loading stations, SD8(1) and DPR(2), in the Chollas Creek Watershed. Hardness data from Chollas Lake is not applicable to the WQOs or for assessing water quality in the greater watershed.</p> <p>Dry weather runoff is often due to irrigation runoff or groundwater. Potable (irrigation) water discharged through pipes may pick up additional minerals which increases its hardness. Groundwater may have increased hardness due to interactions with the surrounding soils. Although water at Chollas Lake is potable water, it would not necessarily have these additional interactions which modify the hardness observed elsewhere. The sentence referring to the relationship between irrigation water and hardness has been corrected for clarity.</p>

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42.	Section 1.3.1.1	<p>CREAC Comment No. 16 - The Diurnal cycle of hardness needs to be discussed and its effects on Chollas Creek sections and the marine waters, of San Diego Bay, measured and presented.</p> <p>Hardness is not known to fluctuate due to the diurnal cycle. Fluctuations in hardness are based on the interactions between runoff and impervious surfaces.</p> <p>High salt/mineral concentrations correlate to larger hardness values and smaller dissolved metals concentrations (see Figure 1-13, <i>Impact of Hardness as a Dominant Variable in the Dissolved Metals Total Maximum Daily Load</i> and the text in Section 1.3.1.1, <i>Dissolved Metals Wasteload Allocations</i>). Due to the high salt content hardness is not an appropriate parameter for marine waters. The California Ocean Plan uses total copper, lead, and zinc concentrations to evaluate marine waters.</p>
43.	Table 2-2	<p>CREAC Comment No. 17 – Explain the ratings presented in this table, specifically for Residential activities compared to Discharger facilities. Document the extent of “Discharger Facilities” and activities in the watershed.</p> <p>These ratings are based on the metals, bacteria, pesticides, and sediment source data presented in the <i>Baseline Long Term Effectiveness Assessment</i> (BLTEA). These tables have been included in Tool A of Appendix D for additional reference. The Low, Medium, and High relative-priority ratings listed in Table 2-2 are based on the pollutant-specific Threat to Water Quality ratings from the BLTEA report, the number of sources in and land use percentage of the watershed, and best professional judgment (Weston, MOE, & LWA, 2006).</p> <p>Ongoing Residential Activities covered by the High priority rating include: home pesticide and fertilizer use, home auto-care activities such as car washing and oil changes, landscape/trash management and pet waste disposal. Dischargers may address these residential behaviors in the watershed through aggressive, targeted outreach and education campaigns. Staff education is ongoing and will continue to address potential pollutants from dischargers’ facilities and activities in the watershed. Language in the Implementation Plan recognizes the “built-out” nature of the Chollas Creek Watershed – the listed residential landscaping and construction activities are not characterized as “permanent” activities. Other watershed activities may focus on residents and commercial landscapers/builders.</p> <p>Discharger Facilities covered by the Medium priority rating include: sites for disposing and treating sewage sludge, 8 landfills, 29 water and wastewater treatment facilities, 24 corporate maintenance and</p>

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			storage yards, and the MS4 system. These Discharger facilities were identified in the metals, bacteria, pesticides, and sediment source data tables (BLTEA report) using data from the City of San Diego, City of La Mesa, City of Lemon Grove, and Caltrans (Weston, MOE, & LWA, 2006).
44.	Table 2-2	<p>CREAC Comment No. 17 –</p> <p>A large percentage of the households in the watershed are low income and eligible for federal assistance. If the Dischargers correction of their activities, in the watershed, is only a medium priority how are these residential activities going to be expected to correct the high activity? Naval and subsidized residential housing makes up a significant portion of the housing in the watershed and this Discharger activity and facilities correction should have a high priority.</p>	<p>Navy housing is mostly privatized and is not distinguished from other residential areas within the Chollas Creek Watershed for purposes of the Dissolved Metals TMDL (see Response No. 28).</p> <p>The BLTEA, a comprehensive study rating sources of pollutants, was conducted by the Copermittees in 2005. The Dischargers have used this comprehensive study to prioritize sources of pollutants in the Chollas Creek Watershed. As new data is gathered and new information is learned about pollutant sources re-prioritization may occur as necessary.</p>
45.	Table 2-2	<p>CREAC Comment No. 17 –</p> <p>The table fails to acknowledge the amount of land and activities controlled by governmental bodies not under the permit and used for school college and universities within the watershed.</p>	See Response No. 42 and No. 43.
46.	Section 2.3	<p>CREAC Comment No. 18 -</p> <p>The commenter organization fully supports the Key Findings (p. 25). The City of San Diego is actively engaged in remedial repair projects to address sewer overflows and flooding occurring along Auburn Creek. The City was forced to purchase through inverse condemnation action a site that flooded with sewage at Wightman Street near 54th.</p>	Comment Noted.
47.	Section 3.2.2	<p>CREAC Comment No. 19 -</p> <p>The Chollas watershed has an unusually large number of open space and landscaped areas that provide opportunities for infiltration. The many public and private places in the watershed that use water for landscaping suggest the opportunity for storm water reuse. Storm water needs to used rather than flushed. The report discussion must</p>	<p>The Implementation Plan has placed an emphasis on seeking out water reuse opportunities, wherever feasible, as discussed in Section 3.2.2 and Appendix D. (Also see Response No. 17 and No. 21).</p> <p>Although there may be significant landscaped areas, infiltration may still be constrained by adjacent or underlying utilities, structures, graves, groundwater tables, soil conditions, and other factors.</p>

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	talk both about soil impermeability and areas needing irrigation. P. 33 states that there are "limited locations" for infiltration but the number of acres used for landscaping belies this conclusion.	
48.	Appendix A Figure 1	CREAC Comment No. 20 - The location of Industrial Permit Holders with Storm Water Sampling Data should be revised to include the industrial activities on Federal boulevard, Home Avenue and Fairmount/47th streets.
49.	Appendix A	CREAC Comment No. 21 - Several Figures which attempt to display the constituent pollutants in Chollas Creek. These charts should consistently graph the same pollutants.
50.	Appendix A Page A-9	CREAC Comment No. 22 - Please explain if there are any activities in the watershed that could be exempted from the ban "for urban pesticides" (Zoos, Cemetery, Nursery, Police Kennel or Horse Stables).
51.	Appendix A Page A-10 and Page A-11	CREAC Comment No. 23 - Please include mapping and data concerning fires that occur in the watershed. Each season there are several canyon fires approaching and acre. More importantly, house, structure, and industrial/commercial fires occur very frequently. The wash from these structure fires to the storm water is probably a bigger pollutant contributor than the out of watershed air deposits. There are likely
		As indicated in the introductory paragraph of Appendix A (Section A.0, top of page A-2) and in the text of the Implementation Plan (Section 2.2), the appendix is a summary of existing water quality data and reports. This assessment was developed for the <i>Chollas Creek TMDL Source Loading, Best Management Practices, and Monitoring Strategy Assessment Report</i> (Weston, 2006) and includes the data that was submitted by businesses.
		Dischargers consistently presented data for copper, lead, and zinc within the Chollas Creek Watershed. Dischargers presented pollutant loading in different graphical formats to illustrate the different concepts discussed in Appendix A. Figures 8 through 15 and Figures 22 through 27 helped Dischargers identify potential sources of pollutants and prioritize sources based on historical data (1994-2005). Figures 16 through 21 helped Dischargers assess loading within the Chollas Creek Watershed (1994-2005 data). Figures 3, 4, and 5 present data from the 2007/2008 monitoring season compared to water quality benchmarks and includes new ambient water quality data.
		See Response No. 4. While Diazinon-based pesticides is not allowed at these locations, regular pesticide use may be addressed through the Integrated Pesticide Management Program, which is implemented by the five Copermittee Dischargers.
		Dischargers will consider mapping large, significant fires on a case-by-case basis. Each Discharger implements BMPs during emergency situations, including fires, as feasible. Section 5.4.3, <i>Exempt and Conditionally Exempt Non-Storm Water Discharges</i> , of the 2003 Caltrans Stormwater Management Plan identifies how Caltrans handles accidental spills and what discharges are considered exempt. Caltrans has no authority over discharges or flows from emergency fire fighting activities (Table 5-2). After

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Response # / Reference		Comment	Response
		some BMPs that could reduce this burn wash.	emergency fires in the San Diego region, Caltrans stabilizes all burned slopes with erosion control and fiber rolls.
52.	Appendix A Page A-3	CREAC Comment No. 24 - The list of re-cycling facilities seems incomplete. Please review the industrial activities on Federal, Home, and Fairmount/47th streets and the recycling centers in City Heights.	See Response No. 47. The inventory of industrial facilities subject to the General Industrial Permit is maintained by the Regional Board. Dischargers that are also Copermittees are required under the Municipal Permit (RWQCB Order No. R9-2007-0001) to update their inventories of industrial and commercial facilities on an annual basis. During the annual inspection program, facilities that are subject to the General Industrial Permit are identified and reported to the Regional Board for the Regional Board to take action as necessary. Updates are made to the inventory on an on-going basis.
53.	Appendix A Figures 18-21	CREAC Comment No. 25 - These figures seem to indicate consistently areas of low pollutant concentrations. Please provide a discussion of why these areas exhibit such low concentrations.	These Figures were taken from the <i>Chollas Creek TMDL Source Loading, Best Management Practices, and Monitoring Strategy Assessment Report</i> (Weston, 2006). The modeled loads presented in these Figures represent relative loads (high/medium/low). The lower relative pollutant loadings may be due to the relatively low commercial/industrial land uses compared to residential land uses and areas of undeveloped land in the southeastern portion of the Chollas Creek Watershed.
54.	Appendix A Figures 18-21	CREAC Comment No. 25 - Early in the 2nd Draft hardness and high concentration of minerals are attributed to "imported water." The figures referenced consistently show that the Chollas Lake has low concentrations. Why?	See Responses No. 40 and No. 41.
55.	-	CREAC Comment Conclusions – The developers of this plan spend considerable efforts talking about reforming residential activity with social interventions; but spend little time talking about how the government is going to clean up its activities.	Comment Noted. Dischargers are using the holistic and integrated approach defined in this Implementation Plan and have targeted jurisdictional activities, in addition to other sources of pollutants/runoff, including residential activities.
56.	Organization of future stakeholder	CREAC Comment Conclusions – Invite broader stakeholder group participation from the watershed, including representatives from all Area	This recommendation will be considered during future, ongoing coordination efforts, including the establishment and update of a TMDL Implementation Plan project website.

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Response # / Reference		Comment	Response
	meetings and comments	Planning Committees, all Business Improvement Associations/Chambers of Commerce's, All PTA, Library and Recreation Councils and all similar neighborhood and community based organizations and homeowner groups.	

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1ST DRAFT CHOLLAS CREEK DISSOLVED METALS TMDL IMPLEMENTATION PLAN

Comments from the Third Stakeholder Meeting on March 30, 2009

Response # / Reference		Comment	Response
1.	All Projects	Open space preservation projects (restoration) should always have a community education link/component	Comment Noted. The City of San Diego incorporated an educational signage component into the Southcrest Park Watershed Activity City 14-2. The public participation process of the City of San Diego Sustainable Canyon's project will also incorporate community input and communication as the conceptual design is completed. This is already a component of the San Diego Unified Port District's Chollas Creek Restoration project. Dischargers will incorporate Education and Outreach, as feasible into future restoration projects.
2.	Appendix B-3	The Restoration project at Southcrest Park should extend from adjacent to the park entrance to the foot bridge. The contrast between restored and non-restored areas will help improve neighborhood "ownership" and provide a strong visual education/outreach message.	The City of San Diego's project concept description has been updated to reflect this comment will be considered during design. See Appendix B-3, City of San Diego, Watershed Activity City 14-2.
3.	All Projects	Water reuse should be incorporated into restoration and large LID-type projects as much as possible.	Comment Noted. This comment will be considered as Dischargers proceed with implementation.
4.	All Projects	Park and recreation projects and storm water projects should be considered together through a master planning effort.	The Chollas Creek Watershed Stakeholders and the City of San Diego have prepared a master plan for the restoration of Chollas Creek, called the Chollas Creek Enhancement Plan (Plan). Any future creek restoration projects implemented by the City of San Diego will be designed according to the Plan.
5.	Appendix B-5	The City of Lemon Grove should review the LID/stormwater polices implemented in other Cities or Countries.	Comment Noted.
6.	Appendix B-3	The City of San Diego should explore opportunities to partner with the Coastal Conservancy and/or other agencies who may be able to provide grant funding.	The Dischargers will continue to explore opportunities for grant funding to support implementation efforts.
7.	All Projects	Dischargers should pursue opportunities for data sharing and/or project collaboration with regional and watershed stakeholders.	Dischargers will continue discussions with stakeholders on coordination opportunities and mechanisms.
8.	All Projects	Dischargers should coordinate with other watershed stakeholders and efforts who are	Comment Noted. Dischargers will continue discussions with stakeholders on coordination opportunities and mechanisms.

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Response # / Reference		Comment	Response
		creating a web-based tool for coordinating efforts and sharing information regarding data/reports and new projects.	
9.	All Projects	Dischargers should open communication with the Chollas Creek Project Implementation Group.	Several Discharger agencies currently attend these meetings and will provide communication with other Dischargers.
10.	Section 3.2.1.1 Appendix B-3	The City of San Diego should evaluate trash collection activities as a potential source of trash.	The City of San Diego will consider this concept during ongoing and future Community Based Social Marketing (CBSM) efforts regarding trash.

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CHOLLAS CREEK DISSOLVED METALS TMDL IMPLEMENTATION PLAN

Comments from the Second Stakeholder Meeting on December 15, 2008

Response # / Reference		Comment	Response
1.	-	Coastkeeper requested that the dry weather data from their monitoring program be included as part of the overall TMDL water quality assessment.	These data may be presented in the Implementation Plan's annual reports as third party data.
2.	-	Coastkeeper commented that not all pollutant sources in La Mesa have been addressed by the current proposed monitoring locations.	The proposed grab sample sites are temporary and therefore can be moved to cover more space/sources, such as areas in the City of La Mesa. These areas will be considered for sampling each year as new sampling sites are selected. A more detailed response will be provided at the February stakeholder meeting.
3.	-	The County suggested that the group should consider whether jurisdictional activities required of those dischargers co-permitted under the Municipal NPDES Permit should be included in the lists of Discharger-specific activities? For example, street sweeping is also a jurisdictional activity required by the Municipal Permit and would achieve a level of load reduction. The group generally agreed that these jurisdictional, or "baseline" activities should be listed.	Dischargers to meet and discuss how to incorporate jurisdictional programs. Preliminary discussion at the meeting suggested including a separate sub-section to the activities table in Appendix B that is specific to jurisdictional activities and/or identified them as "baseline" activities. The level of assessment for the baseline activities would not be as great as the targeted activities that provide an incremental reduction in pollutant loading.
4.	-	Coastkeeper recommended adding the cost of projects to the General List of Activities.	Appendix B (Watershed Activity Lists) will be modified to include a cost column for implementation costs.

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**CHOLLAS CREEK DISSOLVED METALS TMDL IMPLEMENTATION PLAN
ANNOTATED OUTLINE**

Comments from the First Stakeholder Meeting on October 6, 2008

Response # Reference		Comment	Response
1.	-	Include an Appendix as a bibliography.	A Bibliography will be provided.
2.	-	Stakeholders recommended that the schedule indicate the activities for each Discharger. It was suggested that the Cities of Lemon Grove and La Mesa may be able to present the Plan to City Council in May, rather than in March.	Comment Noted.
3.	-	The basis for the proposed monitoring locations should be presented in the Monitoring Plan.	The basis for the monitoring approach will be provided on the Monitoring Plan. The location of the grab samples is based on the Priority Sector approach and land use in each Sector. The Sector approach is defined in the Implementation Plan. All sites are subject to a field recon and will have to be rotated on information gained each year. The GPS coordinates have been provided in the Monitoring Plan.
4.	-	Is LG-1 impacted by contaminated groundwater from underneath the landfill and Chollas Lake Reservoir?	This issue will be discussed with the City of San Diego Environmental Services Department (George Morton for Chollas Monitoring Reports). The location of the grab samples may consider specific source issues. Response to this issue will be provided at a future meeting.
5.	-	Monitoring Plan should have at least 1 site, preferably 2 sites, below the mass loading stations in industrial area at the mouth of Chollas.	Source assessment samples will be collected. There will be at least one grab sample location downstream of the MLS. See Revised Monitoring Plan.
6.	-	Stakeholders also recommended conducting grab sample monitoring at: Auburn Creek and 51st Street Canyon.	See the revised Monitoring Plan (Appendix C). Grab sample will be collected at one location the first year and the other location the second year. Grab sample locations have been selected based on the Priority Sector approach and land use in each Sector.
7.	-	Stakeholders recommended including chlordane as an analyte (pesticides).	Incorporated in to Implementation Plan.
8.	-	Stakeholders recommended integrating the Implementation Plan and Plan components into annual Budget(s) and receive approval from Council(s).	Comment noted. Bugets and council approval processes are discussed during internal planning meetings, as necessary.
9.	-	Stakeholders recommended possible Tier I or Tier	Activities recommended by stakeholders have been added to the List

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Response # Reference		Comment	Response
		Il activities including: 1) Ordinance changes to limit the use of items like material that present high pollutant loading potential to receiving waters (e.g. zinc fencing) and 2) higher frequency inspections of commercial and industrial businesses.	of Potential Watershed Activities, or if activity already existed, notes have been added. Item 1 falls under the category of Tier I "Code Modification" and/or "Product Substitution" activities. Item 2 falls under the category of Tier I "Targeted Facility Inspections" activities. See Table C-1 (tool C) and related sections in subsequent Tools.
10.	-	Should sediment samples be added to the monitoring regime (for synthetic pyrethroids and chlorodane)?	The monitoring plan is designed to address the current Dissolved Metals TMDL and focus on the water based TMDLs (diazinon, dissolved metals, and bacteria). Sediment is outside the scope of the TMDL, therefore no sediment monitoring will be incorporated at this time. BMPs will however take an integrated approach.
11.	-	Should monitoring sites under the TMDL Compliance Monitoring include trash monitoring?	The City of San Diego assesses Trash under its current program. The Monitoring Plan currently has no provisions to collect trash data at any of the sites other than SD8(1) and DPR(2).
12.	-	Design Storm Determination	To be Incorporated into the 2 nd Draft Implementation Plan. The design storm assessment will be incorporated into the Plan following the completion of the ongoing analysis. The design storm analysis had to be extended into this wet season due to the dry conditions of last season. Additional monitoring is planned pending storm events. Once the analysis is completed, recommendations on the design storm will be provided.
13.	-	Why was the San Diego Unified School District not included in the TMDL? Dischargers should contact the Regional Board with this question.	SDUSD was contacted and participated in the November 2008 Discharger meeting. Grossmont and Lemon Grove schools will be invited to participate in future Discharger meetings. In addition, the Dischargers contacted the Regional Board on December 1, 2008. Their response will be provided.
14.	-	How is implementation plan to be implemented using the tools? (require flow chart)	A flow chart was created highlighting the activity selection process. The flow chart and supporting documents will be posted to the stakeholder website.
15.	-	Implementation Plan should include several project examples based on the recommendations from the stakeholder group.	Tier I, Tier II, and Tier III examples have been completed for three different dischargers. These examples have been incorporated into a powerpoint presentation - for discussion purposes only. This will be presented to stakeholders at the next meeting. A more completed summary of planned BMPs for the initial phase I of implementation will be presented by the City.