

## Appendix K. WPG and Public Review Comments

**Table K-1. Comments and Responses from WPG and Public on WMP Draft**

(Page and line numbers refer to public review draft.)

Page#	Line#	Name	Organization	Comment	Response
NA	NA	Isabelle Kay	USCD Natural Reserve System	Regarding Table 2: Groups needed. Try to engage universities more in managing development, restoration, monitoring BMPs and restoration – on their own properties (to sell themselves as green and as research/teaching opportunities. Offer to present to cities the portions of the plan that are relevant – specific LID, restoration sites.	Added text under Action D is Section 7.1.5 to recommend participation by universities in BMP monitoring. Action G in 7.1.6 addresses university participation in general. Section 6.2 recommends that the future watershed council meet with local boards; Sections 6.6 and 6.7 propose annual progress workshops and management partnerships that would include cities. Section 6.7.5 contains several items that involve engaging local governments.

Page#	Line#	Name	Organization	Comment	Response
NA	NA	Florentino Guizar	NA	<p>Did you look at the potential issues created by having increased buffers along the streams? For example, will enhanced stream buffers mean a greater presence of transient, migrant workers living in the stream buffers? Also, as part of the ongoing maintenance or monitoring of the WMP, is there any mention of checking or responding to reports of people living in the stream buffers?</p>	<p>Generally, inhabitation of buffer areas, existing or restored, is a concern for the watershed plan and should be considered and discussed during implementation. If the riparian buffers are properly managed, they would not necessarily increase the presence of people living in the buffers. Invasive species tend to produce a thicker vegetation cover, and this type of vegetation should be prevented from growing in restored riparian buffers. Section 6.2.2.2 notes that “long-term management needs may include invasive species control, fire prevention, removal of diseased trees, and other maintenance activities.”</p> <p>Transient encampments were added as potential sources of bacteria in Sections 4.1 and 6.7.1.</p>

Page#	Line#	Name	Organization	Comment	Response
NA	NA	Jan Fiedler	NA	<p>1. What about the sediment build up under the bridge on Shadowridge with apparent potential for flooding?</p> <p>2. Also, if you would be so kind as to enlighten me as to why funding for two recommended opportunities are confidential??? I imagine others are curious also!</p>	<p>1. The recommendations for stream restoration opportunities in the WMP were developed by considering which stream reaches could be restored to provide watershed-wide benefits with a high likelihood of success. Management of the Shadowridge reach may be warranted, but other stream restoration opportunities in the WMP presented a greater likelihood of success at restoring watershed functions.</p> <p>2. Because of land ownership confidentiality acquisition projects remain confidential.</p>
1-2	17-18	Diane Nygaard	Preserve Calavera	Isn't this just a red flag that there is such a document- perhaps the description should be more generic- or don't mention it	The lines 17-18 refer to the Management Opportunity Database, which is an Excel spreadsheet. We felt that it was more important to ensure that people reading the document knew that that organizations or agencies interested in funding projects could request access to the file. The word "ownership" was removed.
3-4	Table 3-2	Diane Nygaard	Preserve Calavera	Footnotes need to be marked on the table at relevant item	Footnotes were referring to text in earlier version. Footnotes were deleted.
3-5	Table 3-3	Diane Nygaard	Preserve Calavera	"	Footnotes were referring to text in earlier version. Footnotes were deleted.
4-1	13	Diane Nygaard	Preserve Calavera	Add transient encampments	Added.

Page#	Line#	Name	Organization	Comment	Response
4-2	27-30	Diane Nygaard	Preserve Calavera	? only Vista has additional acres of redevelopment- shouldn't other cities have some too?	This text was added to the document: "The redevelopment area was provided by Vista as a major, planned area for redevelopment. Other redevelopment is expected to occur elsewhere in the watershed, but specific locations cannot be predicted."
4-5	17-18	Diane Nygaard	Preserve Calavera	This should be specifically called out as an action item	Corrected
4-17	9	Diane Nygaard	Preserve Calavera	Add transient encampments	Added.
5-2	7-8	Diane Nygaard	Preserve Calavera	Make this a footnote	Lines 7-8 reference to a personal communication citation, which should be included in the text according to the document style guidelines we use.
5-2	42-43	Diane Nygaard	Preserve Calavera	This should be called out as an action item	Corrected
5-3	12-14	Diane Nygaard	Preserve Calavera	"	This is addressed by Action F in Section 7.1.5.
5-3	25-26	Diane Nygaard	Preserve Calavera	The way this is stated it sounds like the buffer regs of Vista and CB are sufficient- but this is not consistent with description of buffers needed in other places in the report. This section needs to be stronger about need for better buffer requirements in each city- and make this an action item.	Removed the words "an essential level of" and the following sentence was added to address this: "Increased riparian area protection would provide additional habitat and water quality benefits." Guidelines for buffer requirements were added as Appendix L.

Page#	Line#	Name	Organization	Comment	Response
5-3	33	Diane Nygaard	Preserve Calavera	I don't believe that in practice they are prohibiting construction in flood zone- see example of Robertson Ranch recently approved in Carlsbad and Robertson batch plant in oceanside. They just add fill to put above flood level and add another detention facility. Need strong language about restriction on construction in flood zones	This issue is beyond the scope of the plan because the regulations are established by the US Army Corps of Engineers, and plan implementation cannot change a federal law. The text on this page notes that "most structures" are prohibited in the floodplain. If a particular structure is allowed in the floodplain and thought to be harmful, this issue should be addressed during development review by concerned parties.
5-3	38-47	Diane Nygaard	Preserve Calavera	The jury is still out to determine if current plans are sufficient to protect sensitive species-only time will tell- but they do provide a framework/focus.	Text added: "Once the HMPs are finalized, WMP implementation should focus on protecting and managing habitat and sensitive species that are not addressed by these HMPs."
5-4	12-13	Diane Nygaard	Preserve Calavera	Shouldn't this be an action item	Text added in Section 6.6.3 to address this.
5-4	31-34	Diane Nygaard	Preserve Calavera	Could also mention Coastkeeper- they are training stream monitors and have monitoring locations and data collection- plus Surfrider gets involved in key issues	Text added: "The San Diego Coastkeeper is an organization that trains stream monitors, collects monitoring data, and participates in watershed management efforts, and Surfrider is involved with key watershed issues in the region."

Page#	Line#	Name	Organization	Comment	Response
5-5 5-6	4 1-3	Diane Nygaard	Preserve Calavera	This implies 50' riparian buffer is sufficient for development - but that is not consistent with what is proposed for buffer restoration- and ignores other factors like slope and upland buffer. As said previously- need a recommendation re standard buffer language that protects the watershed functions.	Changed text to read: "Disturbance of additional riparian vegetation, outside of the currently protected 50 foot buffers, may cause additional watershed impacts, and the past impacts to riparian habitat will continue to contribute to watershed impacts if this habitat is not restored."
6-11	7-8	Diane Nygaard	Preserve Calavera	If this is the property list- again we are calling attention to a confidential document- but I think I saw it called something else so perhaps this is not the property details.	We felt that it was more important to ensure that people reading the document knew that that organizations or agencies interested in funding projects could request access to the file.
6-12	6-8	Diane Nygaard	Preserve Calavera	Why mention this?	These lines were deleted to address this comment.
6-37	22-23	Diane Nygaard	Preserve Calavera	Any more specific recommendations re priority areas for additional CRAM analyses?	The locations used for the WMP were comprehensive. The main priority would be to monitor at the locations used in the WMP's field reconnaissance. The priority for CRAM monitoring should be to obtain a good spatial baseline across the watershed and to follow up periodically at all locations in order to detect trends that can be used to modify actions or priorities in the WMP.

Page#	Line#	Name	Organization	Comment	Response
6-48	31	Diane Nygaard	Preserve Calavera	Dam repair is complete- just finishing ancillary roads ,etc. It really sounds like this is a 4 <sup>th</sup> focus area once the dam repair is complete- ignoring this seems to minimize this area. It seems like there are "priorities" located throughout the watershed- the point with calling out these clusters is not so much that they are higher priority- but that there are interrelationships so that looking at the area together will have greatest benefits- maybe this should be reworded if that is the case.	<p>The drainage area of Calavera Creek did not appear to present as many complementary management opportunities as the focus areas we selected. The focus areas were selected based on how high priority actions can be implemented together to achieve the greatest benefit.</p> <p>The text was changed to read: the stream conditions should be evaluated after the Lake Calavera dam is repaired and before a comprehensive restoration effort is planned within this drainage.</p> <p>Footnote added stating that dam repair and associated construction will be completed soon after WMP is finalized.</p>
7-2	section	Diane Nygaard	Preserve Calavera	Add stream buffer guidelines	Stream buffer guidelines were added to the appendices and referenced in the document.
7-3	section	Diane Nygaard	Preserve Calavera	For this to work it sounds like a whole lot of folks need to have access to confidential data. In absence of Watershed Coordinator need to have an interim plan.	In the interim period, prior to the hiring a Watershed Coordinator, annual acquisition workshops should be performed by and wildlife agency staff.

Page#	Line#	Name	Organization	Comment	Response
7-3	section	Diane Nygaard	Preserve Calavera	There generally is no point to contact landowners until there has been at least preliminary funding assessment- and the number of potential persons making contact is too large. This is an extremely sensitive area and the contact needs to be made by someone with professional expertise/or with such advice and back-up and to assure there is not duplicative efforts. We haven't yet really figured out who that key contact person is. If it is to be the Watershed Coordinator they need to have some real experience with this.	Tetra Tech sent an example watershed coordinator job description to the client with typical education skills and knowledge requirements listed that would address this concern.
7-4	7-9	Diane Nygaard	Preserve Calavera	Again- how do we really do this with confidential data?  There are hundreds of properties on the full list- so just keeping the list up is a huge job. Need to limit this somehow.	A watershed coordinator should be hired that has database management skills. This qualification was included in the list of qualifications for the watershed coordinator.
7-6	9-10	Diane Nygaard	Preserve Calavera	"	Addressed above.
7-9	12-20	Diane Nygaard	Preserve Calavera	Who really will take the lead on this- if City of Vista then need to pin down a position within the org- and what dept in each local jurisdiction is the point of contact.	The jurisdictions are listed as the lead however; it will take all the stakeholders working together. At this time the contact is the Program Manager for the Vista Water Quality Protection Program.
7-10	section	Diane Nygaard	Preserve Calavera	Someone needs to be designated to secure funding for the Watershed Coordinator	See response above.
7-11	12	Diane Nygaard	Preserve Calavera	Without having funding identified- with a grant available the last half of this year there is no way to accomplish this within the time schedule proposed	See response above.



Page#	Line#	Name	Organization	Comment	Response
7-12	Section 7-3	Diane Nygaard	Preserve Calavera	Add a summary table of estimated costs by program area and one by jurisdiction to make it easier for them to assess their own potential costs.	Summary table added to Appendix H.
A-13	15-18	Diane Nygaard	Preserve Calavera	Oceanside draft SAP also has 50' buffer plus 50' planning buffer	Text and reference added.
App C	P 13	Diane Nygaard	Preserve Calavera	Site SR-5- Not all all clear what habitat is to be restored and where	A preservation / restoration opportunity in this area would include preserving this area as a sediment sink and providing habitat opportunities to complement it. A lake or potentially instream wetlands would be a compatible use for this area. More explanation is provided in the Bioengineering Report.
NA	NA	Al Cerda	Agua Hedionda Lagoon Foundation	I think it would be a good idea to mention the Marine Biological Reserve to the map title "Lagoon Focus Area" that was handed out during the meeting. It would be nice to see that in the legend also, I am not sure of the correct name of the reserve and Bill may help out with that.	Added to map.
4	10	Ken St. Clair	City of San Marcos (Stormwater)	Delete letter "e" at the end of my last name on line 10 of page 4.	Corrected.

Page#	Line#	Name	Organization	Comment	Response
NA	NA	Ken St. Clair	City of San Marcos (Stormwater)	<p>I found throughout the document that multiple names were being used for the same item. Such as:</p> <p>Regional Water Quality Control Board, Regional Water Quality Board, RWQCB, SDRWQCB, Regional Board....</p> <p>Order R9-2007-0001, MS4 Permit, 2007, 2007 Order, Order 2007-0001, Final Order No. R9-2007-0001....</p> <p>It makes it more confusing than it needs to be. They might want to do a continuity check for those types of items in the document.</p>	Corrected.
4-11	NA	Bill Kloetzer	NA	<p>CA Least Tern is described as "extirpated". Click on the following link to see a photo of what I believe to be a CA Least Tern shot June 14, 2008 from the AHL Eco Reserve looking south over the lagoon:</p>	<p>The database that tracts sensitive species in CA lists this species as extirpated. As stated in the document, the California least tern <u>has been observed</u> in the vicinity of the lagoon but is not believed to nest within the watershed due to absence of foraging habitat.</p>
4-14	NA	Bill Kloetzer	NA	<p>It might be useful to elaborate and contrast use restrictions within a Marine Reserve (AHL), a Marine Park (Buena Vista, Batiquitos and San Elijo Lagoons), and a Marine Conservation Area.</p>	<p>Corrected. Language describing general restrictions within MPAs has been added to this section.</p>

Page#	Line#	Name	Organization	Comment	Response
4-17	NA	Bill Kloetzer	NA	Some may argue that climate change is inevitable while growth and development which exceeds the capacity of our infrastructure is not.	The WMP is consistent with this argument. The role of the WMP is to address growth and development among other issues. As these issues are addressed, it will be important to consider future conditions caused by climate change that could prevent the success of management efforts.
5-3	NA	Bill Kloetzer	NA	Habitat management (i.e., stewardship versus land acquisition) needs improvement. On practically any day of the week, you can walk through AHL Eco Reserve and see 1) "bird dog" owners running their dogs throughout the reserve, 2) motorized and non-motorized dirt bike riders, or 3) one family uses the Reserve to fly remote-controlled, gas-powered airplanes!.	Text added in this section and in Section 6 to address this.
5-9	NA	Bill Kloetzer	NA	Just a comment, I find it curious and of great concern that "an overarching environmental protection group is missing in the watershed".	Yes, this is a major management gap.
5-3	37-47	Rosanne Humphrey	TAIC, consultant to City of Carlsbad	The MHCP is a subregional NCCP/HCP plan and the Carlsbad HMP is a subarea plan under the MHCP. So I'd change line 39 to say "The MHCP subregional Plan and the Carlsbad Habitat Management Plan (HMP), an MHCP subarea plan, are protecting critical habitat.....MHCP subarea plans for Vista, San Marcos, and Oceanside are expected to protect...."	Change made.

Page#	Line#	Name	Organization	Comment	Response
6-16	1	Rosanne Humphrey	TAIC, consultant to City of Carlsbad	It would be helpful to have a discussion of ideal (and/or minimum) buffer widths that would be required for (a) water quality improvement and (b) habitat function. For example, include some of the detail that is A-12 and A-13.	Stream buffer guidelines were added to the Appendices and referenced in the document.
7-21	16	Rosanne Humphrey	TAIC, consultant to City of Carlsbad	(SANDAG) should go to the left of the period rather than the right.	Corrected.
A-15	38	Rosanne Humphrey	TAIC, consultant to City of Carlsbad	Last word in line 38 –change threaten to threatened.	Corrected.
A-13	19	Rosanne Humphrey	TAIC, consultant to City of Carlsbad	Paragraph starting on line 19: The City of Carlsbad requires a 100-foot wetlands and riparian buffer outside of the coastal zone. Also I would re-word the for sentence to read “Beyond the regional requirements listed above, the City of Carlsbad requires developers to preserve a minimum 50-foot buffer for riparian habitat and 100-ft buffer for wetlands – measured from the outside edge of the riparian/wetland vegetation – within the City of Carlsbad’s coastal zone, as designated by the Carlsbad Habitat Management Plan (HMP). A 100-ft buffer is required for all riparian and wetlands habitat outside of the Coastal Zone, also measured from the outside edge of the riparian/wetlands habitat.”	Added.
Ack.	4	Todd Snyder	County of San Diego	Change “Watershed Plan” to “Watershed Management Plan”	Corrected
Ack.	33, 38	Todd Snyder	County of San Diego	Spell out DPLU as Department of Planning and Land Use	Corrected

Page#	Line#	Name	Organization	Comment	Response
1-1	30	Todd Snyder	County of San Diego	Change “representations” to: “representation” or “representatives”	Corrected
2-3	15	Todd Snyder	County of San Diego	Change “their” to “its”	Corrected
3-5	1-3	Todd Snyder	County of San Diego	Table 3-2 does not contain the footnotes that are referenced at the bottom of the table.	Corrected
3-6	1-8	Todd Snyder	County of San Diego	Table 3-3 does not contain the footnotes that are referenced at the bottom of the table.	Corrected
4-12	13	Todd Snyder	County of San Diego	Replace “stagnate” with “stagnant”	Corrected
4-16	15	Todd Snyder	County of San Diego	Replace “formerly” with “formally”	Corrected
5-1	26	Todd Snyder	County of San Diego	Add “potential” after “ ... existing and”	Corrected
5-2 5-9	21-30 27-28	Todd Snyder	County of San Diego	The use of modeling tools to select appropriate BMPs for development sites does not seem to have any context within this section. The concluding sentence states: “Developers would enter their site data into the model, and development review staff would compare model output to loading targets and determine if a development meets the stormwater requirements”. This approach was not discussed in any detail by the Watershed Planning Group. The use of models might, in fact, be an improvement over existing procedures, but many factors have not been explored: feasibility, timeliness, cost, accuracy of available models, etc. Since the text in question is not reflected in any of the recommended actions presented on page 6-8, deletion might be the most appropriate fix at this point in the process.	Corrected

Page#	Line#	Name	Organization	Comment	Response
5-3 A-12	25-30 43	Todd Snyder	County of San Diego	<p>In addition, the County of San Diego has buffer regulations in place through its Resource Protection Ordinance (RPO). The RPO significantly restricts impacts to various natural resources, including wetlands and wetland buffers. Certain permit types are subject to the requirement to prepare Resource Protection Studies under the RPO. No impacts may occur to lands determined to be wetlands as defined by the ordinance, except those impacts related to aquaculture, scientific research, invasive species removal, wetland creation and habitat restoration, and wetland crossings for roads/driveways/trails that are determined to be necessary for access, and where there is no feasible alternative that avoids the wetland. The RPO defines wetlands as lands having one or more of the following attributes: 1) At least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places), 2) The substratum is predominantly undrained hydric soil, or 3) An ephemeral or perennial stream is present, whose substratum is predominantly non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system. In addition, the RPO requires that a wetland buffer be provided to further protect the adjacent wetlands. The RPO defines “wetland buffers” as lands that provide a buffer area of an appropriate size to protect the environmental and functional habitat values of the wetland, or which are integrally important in supporting the full range of the wetland and adjacent upland biological community. Buffer widths shall be 50 to 200 feet from the edge of the wetland as appropriate based on the above factors. Where oak woodland occurs adjacent to the wetland, the wetland buffer shall include the entirety of the oak habitat (not to exceed 200 feet in width). Moreover, uses allowed within the actual wetland are the only allowed uses within the buffer.</p>	Text added.

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5-6	1	Todd Snyder	County of San Diego	Add County of San Diego	Added.
6-2, 6-3	9-43, 1-3	Todd Snyder	County of San Diego	Organizationally, "Irrigation Return Flow" does not fit within a section on "New Development Site Management". The recommendations offered appear to relate mostly to existing developments.	The recommendations apply to any type of development. The section notes that the recommended tools can be applied to both new and existing development.
6-2	11	Todd Snyder	County of San Diego	Change "should" to "would"	Corrected
6-2	29	Todd Snyder	County of San Diego	Change "San Diego Department of Planning and Land Use" to "the County of San Diego Department of Planning and Land Use"	Corrected
6-2	31	Todd Snyder	County of San Diego	(San Diego County, 2008) not found in the References section. The text does not make clear which County document/ordinance requires the use of drought tolerant plant species and limitations on irrigation.	Citation (to a website) has been added to the References section. As noted in the WMP, it is a recommendation and not a requirement of the Planning Dept. to use drought tolerant species and limit watering, while still maintaining a green space around homes.
6-4	4-5	Todd Snyder	County of San Diego	Change "San Diego County" to "County of San Diego"	Corrected
6-4	39	Todd Snyder	County of San Diego	Change "0" to "Figure 6-1"	Corrected by someone else.
6-5	17	Todd Snyder	County of San Diego	Change "0" to "Figure 6-2"	Corrected by someone else.
6-8	3-4	Todd Snyder	County of San Diego	This does not appear to be a recommended action, but would be valuable if added to the discussion on page 6-7 around lines 4-5.	Added "application" to make the statement an action.

Page#	Line#	Name	Organization	Comment	Response
6-8 6-13	20 11	Todd Snyder	County of San Diego	It is not clear which “Section 1” this is referring to.	Corrected.
6-8	21	Todd Snyder	County of San Diego	A more descriptive title would be “LAND ACQUISITION, RIPARIAN BUFFER RESTORATION, AND WETLANDS RESTORATION”	Changed.
6-16	45	Todd Snyder	County of San Diego	It is unclear why upland areas would be included at all, since lands identified for buffer restoration should all be riparian.	That is correct. Deleted mention of upland areas.
6-31	12-13	Todd Snyder	County of San Diego	Change “San Diego County” to “County of San Diego”	Changed.
6-35	23-24	Todd Snyder	County of San Diego	Monitoring at the “temporary watershed assessment station” also occurred in Year 1, not just Year 4 of Order 2007-0001.	Corrected.
6-40	4-5	Todd Snyder	County of San Diego	Duplicates of Lines 1 and 2	Corrected
6-47	3	Todd Snyder	County of San Diego	Text does not specify who the Carlsbad Highlands Mitigation Bank was created by.	The origin of the mitigation bank is not clear; it appears to have been a collaborative effort by the City of Carlsbad, the Carlsbad Oaks North Project and the wildlife agencies; however we are unable to get a complete answer.
7-1	13	Todd Snyder	County of San Diego	Change “lead” to “led”	Corrected
7-1	39-40	Todd Snyder	County of San Diego	It is not clear what this is referring to. Recommend deletion.	Corrected.
7-2	26	Todd Snyder	County of San Diego	Change “SWQCB” to “RWQCB”	Corrected.
7-21	12	Todd Snyder	County of San Diego	Change “Multiple Species Management Program” to “Multiple Species Conservation Program”	Corrected



Page#	Line#	Name	Organization	Comment	Response
Section 6.3		Meleah Ashford		Update stream restoration costs, add site SR-12, and add brief explanation of cost estimates.	Text added and updated.
NA	NA	Sandra Farrell		<p>Several months ago you toured the headwaters of Agua Hedionda Creek in preparation for creating the technical reports of the Agua Hedionda Watershed Plan. As you may remember I sent many photos and a Google Earth file noting the location of each photo to Marjorie Miller.</p> <p>I noticed in the Water Quality Analysis and Recommendations Report that no water quality monitoring stations were placed at the headwaters (well area) and down to South Santa Fe. I know the pond and creek were dry at that time but the well had water in it and as we walked downstream we could see that after the inlets from the Santa Fe Hills development the stream was full and both ponds to the south were full. We had hoped to get readings so we could help the City of San Marcos get a handle on pollution that is entering the creek at the end of Las Poses from run off from the streets and yards. Can you take a moment and tell me why your firm decided not to monitor that area?</p>	Collecting new water quality data was not allowed in this grant. All data is based on existing sources ,and Tetra Tech did not conduct water quality monitoring as part of this project.

Page#	Line#	Name	Organization	Comment	Response
Acknowledgements	all	Mary Clarke	Friends of Hedionda Creek	Suggest listing names in alphabetical order by last name (rather than first name).	Corrected
1-1	4,5,6	Mary Clarke	Friends of Hedionda Creek	Suggested wording: The WMP [etc.] ...throughout the watershed. It takes into consideration the complex relationships among different watershed processes. Government entities, non-governmental organizations (NGOs), citizens, [etc.].	Tetra Tech considered this wording but found that it did not fit within the writing style used for the WMP.
1-1	8,9	Mary Clarke	Friends of Hedionda Creek	Suggested wording: As the watershed faces additional stress from development, the WMP will provide a foundation for successfully addressing both past and potential future degradation. Additionally, as [etc.]	Separated into 2 sentences.
Throughout		Mary Clarke	Friends of Hedionda Creek	Many compound sentences. Suggest splitting them up into 2 or 3 shorter sentences. (Will make suggested changes as much as possible -- see the two preceding comments.)	Tetra Tech used a widely accepted writing style that recommends the use of compound sentences. We prefer to stay with this style because it is widely accepted.
1-1	28	Mary Clarke	Friends of Hedionda Creek	What are "accountability methods"?	The evaluation framework of goals, management objectives, indicators, and benchmarks which were used in the assessment of conditions and evaluation of management strategies and opportunities, and which can be used to evaluate success of the Plan. This definition was added to Section 1-1.

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1-2	16,17,18	Mary Clarke	Friends of Hedionda Creek	Suggested wording: The Management Opportunity Database, a spreadsheet tool that contains ownership information for all parcel or site-based opportunities, will be provided to decision makers.	Wording changed.
1-2	23,24,25,26	Mary Clarke	Friends of Hedionda Creek	The end of the sentence beginning, “The plan presents, [etc.]” is not clear. Can you use language other than “...lead to greater functional uplift”? The term “functional uplift” is not clear to me.	Changed to “greater improvement in watershed functions.
2-3	6	Mary Clarke	Friends of Hedionda Creek	First sentence. Suggested wording: Land use is a major factor in watershed health and degradation.	Wording changed as requested.
2-3	8,9,10	Mary Clarke	Friends of Hedionda Creek	Suggested wording: Therefore, consideration of existing and [etc.]	Wording changed as requested.
2-3	18	Mary Clarke	Friends of Hedionda Creek	When you say “Both SANDAG GIS coverages...” do you mean the current and the planned? Could you be more specific?	Explanation added.
2-4	4	Mary Clarke	Friends of Hedionda Creek	It would be clearer to say “By 2007” rather than “By this time, etc.”	To avoid repetition, sentence left as is.
2-4	7	Mary Clarke	Friends of Hedionda Creek	Suggested wording, last sentence: “Most of the areas” etc. (Instead of “And most of the areas” etc.)	Corrected.
2-4	15	Mary Clarke	Friends of Hedionda Creek	Suggested wording: “...along many of the streams” etc. (Instead of “...along much of the streams” etc.)	Wording changed as requested.
2-7	1	Mary Clarke	Friends of Hedionda Creek	Suggested wording: “Urbanization has profound influences on watershed health.”	Wording changed as requested.

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2-7	5 thru 12	Mary Clarke	Friends of Hedionda Creek	This is good information about the impact of impervious cover at different levels. Is there any similar information for Southern Calif.?	We are not aware of similar information available for Southern California.
2-7	13 thru 19	Mary Clarke	Friends of Hedionda Creek	It is difficult to identify the subwatersheds and creeks on Fig. 2-5. Can you add the subwatershed numbers to the Figure?  Subwatershed 1001 and 1028 are not clearly identifiable on Fig. 2-5.  Adding a few major streets on Fig. 2-5 would help the reader to identify the areas being described in the text. Suggest adding El Camino Real, Melrose and Canon.	Corrected.
2-7	17	Mary Clarke	Friends of Hedionda Creek	I couldn't identify the "pocket of low imperviousness" along Little Encinas Creek in Fig. 2-5.	Corrected.
2-7	21-22	Mary Clarke	Friends of Hedionda Creek	"The stress on any particular reach is a result of cumulative imperviousness and associated runoff upstream of that reach." I thought that pollution and invasives could also result in stress on a reach, but maybe you are just talking about imperiousness here. If so, you could make that clear in the first sentence on line 20.	Explanation added.

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2-7	22-23	Mary Clarke	Friends of Hedionda Creek	Suggest you omit the statement: “Headwaters subwatersheds with relatively high imperviousness may not exhibit as severe stream impacts [etc.]” This needs further explanation and does not add to this paragraph. If you want to leave it in, suggest a re-write such as, “In headwaters subwatersheds, imperviousness may not impact the stream as severely as downstream subwatersheds that have higher cumulative imperviousness.” – if that is the gist of what’s being said.	Changed to client’s suggested re-write.
2-7	24	Mary Clarke	Friends of Hedionda Creek	Suggest leaving out the word “Even” at the beginning of the sentence on Line 24.	Corrected.
3-1	16	Mary Clarke	Friends of Hedionda Creek	Omit the comma between “on” and “candidate.”	Corrected, but my opinion is the comma should stay in to make it read properly.
3-1	19-21	Mary Clarke	Friends of Hedionda Creek	A comma is not placed after “project team” and “and” in the sentence beginning, “This important [etc.]” This is fine, but needs to be consistent throughout the document. Either you use a comma before the final “and” in a series or you don’t.	Comment could not be fully addressed due to time constraints. Tetra Tech used a widely accepted writing style which allows for both comma uses.
3-1	26	Mary Clarke	Friends of Hedionda Creek	Here a comma is placed before the final “and” in a series (“... Poseidon Resources, and Cabrillo [etc.]” I think it is clearer to use a comma before the final “and” in a series.	Within this paragraph, comment use was changed to be consistent.

Page#	Line#	Name	Organization	Comment	Response
3-2	Item 2.d)	Mary Clarke	Friends of Hedionda Creek	Need to relate wildlife habitat to watershed health. How about, "Provide natural area connectivity to improve and maintain wildlife habitat, a beneficial watershed use."	These objectives have been adopted by the WPG as written and should not be changed at this point in the process. A sentence was added on page 3-1 to communicate that the goals and objectives consider the protection and restoration of beneficial watershed uses.
3-3	3	Mary Clarke	Friends of Hedionda Creek	Suggest using the word "assess" rather than "measure" in this sentence, line 1. "Assess" is a more general term.	Corrected.
3-3	5-8	Mary Clarke	Friends of Hedionda Creek	Suggested rewrite: "Examples of natural resource indicators for the objectives listed above are benthic community, channel morphology, and riparian habitat (e.g., as defined by percentage undisturbed habitat within the 100-year floodplain.)"  "Examples of programmatic tracking indicators include the number of local governments adopting the WMP and the number of presentations [etc.]"	Wording changed as requested.
3-3	5.f)	Mary Clarke	Friends of Hedionda Creek	Suggested wording: change "sponsors that [etc.]" to "sponsors who [etc.]"	Corrected.
3-4	2-5	Mary Clarke	Friends of Hedionda Creek	Suggest breaking this one long sentence down to three sentences.	Sentence separated into 2 sentences.
3-4	9	Mary Clarke	Friends of Hedionda Creek	Suggested wording: "...Tech developed several assessment tools, [etc.]"	Wording changed as requested.
3-4	Table 3-2, second box under "Indicator"	Mary Clarke	Friends of Hedionda Creek	Note that the indicators require sampling and testing. Do you want to include sampling and testing under "Assessment Tools/Methods"?	Samples and tests are already being done as part of the local and regional monitoring programs.

Page#	Line#	Name	Organization	Comment	Response
4-1	13	Mary Clarke	Friends of Hedionda Creek	The comma after “sources” should be after “(i.e., wildlife)”	Corrected
4-1	15	Mary Clarke	Friends of Hedionda Creek	It would be helpful here to have a footnote at the bottom of the page describing TMDLs.	Footnote added.
4-1	23	Mary Clarke	Friends of Hedionda Creek	In this sentence, it would be helpful to say where the wet weather monitoring station is located.	Location added.
4-1	32	Mary Clarke	Friends of Hedionda Creek	Could you explain the statement, “...although groundwater is likely the chief contributor to TDS levels throughout the watershed.”? Needs more explanation.	Additional explanation added.
4-2	1	Mary Clarke	Friends of Hedionda Creek	“Exceedances” is not in the dictionary. Is it a scientific term? If not, you should rephrase the sentence.	The term is the plural of exceedance. The term is used by EPA and other agencies.
4-2	14	Mary Clarke	Friends of Hedionda Creek	It would be helpful for you to spell out TN and TP.	Corrected
4-2	25	Mary Clarke	Friends of Hedionda Creek	Please explain why the year of 2001 is used.	This was the date of the SD RWQCB 2001 Order.
4-2	35	Mary Clarke	Friends of Hedionda Creek	The word “Scenario” is used twice. It probably should follow “Future” and not “BMPs”	Corrected
4-4	13	Mary Clarke	Friends of Hedionda Creek	The phrase, “...full range of possibilities” is vague. Need to be more specific.	More specific text added.
4-4	13-18	Mary Clarke	Friends of Hedionda Creek	This is a very long sentence. Suggest that it be broken up into 3 sentences.	Separated into three sentences.

Page#	Line#	Name	Organization	Comment	Response
4-5	17,18	Mary Clarke	Friends of Hedionda Creek	Explain what the San Diego Region Hydromodification Plan is or reference an earlier explanation.	Explanation added.
4-7	9	Mary Clarke	Friends of Hedionda Creek	I wasn't able to read "Roman Creek" on Fig. 4-4. Can the lettering in the figure be clearer?	Corrected.
4-8	13	Mary Clarke	Friends of Hedionda Creek	The sentence, "If land is available along the margins of the lagoon this could represent a shift; [etc.]" is not clear. A shift from what to what? Please explain.	Explanation added.
6-11	Fig. 6-3	Mary Clarke	Friends of Hedionda Creek	Please say where this photo was taken.	Explanation added.
6-11	Entire section	Mary Clarke	Friends of Hedionda Creek	Our stakeholder group, Friends of Hedionda Creek, has been working for the last 10 years to conserve the headwaters of Agua Hedionda Creek and the habitat that surrounds it. We have been attempting to acquire the undeveloped open space at the headwaters for conservation. This is in accordance with Objective #7 of the Carlsbad Watershed Management Plan, which states: "Protect Upland Headwater Open Space: 'Action Items' should strive to protect, restore, or enhance undeveloped open space in the headwaters of the watershed that will provide natural filtering capabilities for water runoff control and water quality improvements. The 'Action Item' should focus on the purchase or transfer into public ownership or control as many of these resources as possible, including restrictive easements and other policies and management needed for protection. Integration with habitat conservation plans and open space	<p>To address this comment, a list of medium priority opportunities specifically recommended by stakeholders was included in this section. The parcels mentioned are included in this list as well as parcels recommended by other stakeholders.</p> <p>The comments on medium priority acquisition properties received during the atlas map comment period in June were addressed by adding these properties to the stakeholder priority list, which receives a higher score than non-priority properties. All comments on properties received from stakeholders across the entire watershed were addressed in this manner.</p> <p>The Agua Hedionda Watershed Management Planning process</p>



Page#	Line#	Name	Organization	Comment	Response
				<p>planning is essential.”</p> <p>I recently sent the following message to Kimberly Brewer to reiterate that all of the undeveloped properties along the headwaters of the creek should be high priority for acquisition. I have not received a response to my message, so I am going to repeat it below.</p> <p>Subj: Re: Agua Hedionda Watershed Draft Focus Areas for Management: Comments Needed...</p> <p>Date: 7/10/2008 7:54:25 PM Pacific Daylight Time</p> <p>From: <a href="#">ClarkeMH</a></p> <p>To: <a href="mailto:Kimberly.Brewer@tetrattech.com">Kimberly.Brewer@tetrattech.com</a></p> <p>CC: <a href="mailto:slfarrell@cox.net">slfarrell@cox.net</a></p> <p>BCC: <a href="#">ClarkeMH</a></p> <p>Hi Kimberly --</p> <p>Meleah made a presentation at our monthly meeting with the Wildlife Agencies on July 2 regarding parcels recommended for acquisition (High Priority) in the Agua Hedionda watershed. Our group, Friends of Hedionda Creek (FHC), is pleased that a number of parcels at the headwaters of the creek are on the high priority for acquisition list. However, there are some parcels that</p>	<p>included a rigorous process for establishing goals and management objectives and developing prioritization criteria directly linked to the management objectives. The Land Acquisition prioritization focused on evaluating both the quality of the parcels identified for preservation and the quality of the surrounding habitat. The screening criteria included, but was not limited to, such metrics as naturally vegetated areas, riparian habitat, wetland habitat, priority species observations, soil erosion hazard, degree of existing protection, and location relative to stream restoration opportunities. Stakeholder support was also a key screening criteria. The WPG members reviewed and commented on the draft screening criteria and scoring methods, and the prioritization tool was revised accordingly. The prioritization process identified priority preservation parcels which best met the goals and objectives related to protecting, restoring, and enhancing habitat in the watershed and providing the greatest watershed functional uplift. The Prioritization Tool is a living tool which should be updated as management objectives change.</p>

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				<p>we believe are key to the health of the watershed that are not on the high priority list.</p> <p>The first parcels that we are concerned about are LA-34, LA-64, and LA-111, in Sub #1024. The creek runs through the southeastern corner of LA-34, and LA-64 and LA-111 are undeveloped with intact native habitat (CSS). There are tributaries to the creek in LA-64, and also possibly in LA-111.</p> <p>FHC has worked actively for the last 10 years for the conservation of these parcels, along with the High Priority parcels to the east and south of the creek. As far as we know, there is one owner, Farouk Kubba, of parcels LA-34, -64, and -111. We have recently negotiated with him for the acquisition of all of his properties in this area (some 180 acres), but the appraised value (\$9.5-10 million) wasn't enough for him to sell the properties to us. We still have hopes that he might change his mind. Having all of these parcels on the high priority for acquisition list would help our efforts enormously. The Wildlife Agencies support our efforts to acquire the Kubba properties.</p> <p>Secondly, we are concerned that parcels LA-31, LA-133, LA-106 and LA-108, just southwest of the Kubba properties, are not on the high priority for acquisition list. These parcels include the creek and undisturbed CSS in the uplands. They are important to the natural functioning of the creek. We refer to these parcels as the Murai/Bieri property. The Murai family sold the property to Bieri, a developer, a few years ago. We doubt that Bieri will want to</p>	

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				<p>sell the property for conservation, but you never know, what with the housing market being so bad right now. If we could acquire those properties for conservation, it would be extremely beneficial for the watershed.</p> <p>The Wildlife Agencies would also support the acquisition of the Murai/Bieri properties for conservation.</p> <p>I asked Meleah at the meeting why these properties were not on her high priority for acquisition list and she said that the consultant didn't want to get too many parcels on the list. But I would have to disagree with that line of thought, because all parcels that are important for the natural functioning of the creek should be included on the high priority for acquisition list. The chances that we will be able to acquire even a small percentage of them are slim, because we have to have willing sellers and the money has to be available.</p> <p>We urge you to include the above-referenced parcels on the high priority for acquisition list.</p> <p>Thank you very much --</p> <p>Mary Clarke</p>	

Page#	Line#	Name	Organization	Comment	Response
7-1		Mary Clarke	Friends of Hedionda Creek	<p>I think the key to implementation of the plan is the Watershed Coordinator. Funding for this position is an issue. I suggested to Meleah Ashford that, if the Vista City staff take the plan forward for approval by the City Council, they could include a recommendation that Council direct staff to apply for grants for a Watershed Coordinator position.</p> <p>I have also heard that some NGOs have offered to fund a Watershed Coordinator position short-term. Perhaps the NGOs could fund a consultant who has expertise in grant-writing, who could write grant applications for the Coordinator position. The assurance of long-term funding is needed for this position, to attract high-quality individuals to apply for it.</p>	
N/A		Mary Clarke	Friends of Hedionda Creek	The map shows “Calaveras Lake.” The correct name is Calavera, and I have always heard it referred to as Lake Calavera. Please check to be sure that Calavera is spelled correctly throughout.	Corrected.
5-5, 5-6		Mary Clarke	Friends of Hedionda Creek	Mary Clarke	Friends of Hedionda Creek
7-2		Mary Clarke	Friends of Hedionda Creek	Add stream buffer guidelines.	Stream buffer guidelines were added to the Appendices and referenced in the document.

Page#	Line#	Name	Organization	Comment	Response
4-4	Figure 4-1	Sandra Farrell	Friends of Hedionda Creek	I'm not sure it's clear to the public how the land use designations such as "very low density" and "low density" relate to the title "Priority Sub watersheds with Highest Existing runoff Volume and Pollutant Loading". If you would add percentage of runoff volume or a factor by each land use designation it would help make it clearer.	The type and density of developed land uses are a key factor in determining watershed hydrologic response. More information about land use classifications and response in terms of runoff and loading is available in the Agua Hedionda Watershed Modeling and Geomorphic Analysis Report.
4-16	Fig 4-7	Sandra Farrell	Friends of Hedionda Creek	Figure 4-7 shows no invasive species in the very upper portions of Agua Hedionda Creek. Either the graphic is incorrect or the amounts are too small to consider noting on the figure. There are two – three arundo stands, one Pampas grass area, and Castor Bean along the San Diego Aqueduct easement due to disturbance by trespassers. Please review the data for this area.	These data were acquired from SELC and may not represent all invasive species occurrences. To address this, a caveat was added to the WMP.

Page#	Line#	Name	Organization	Comment	Response
6-14	6-3	Sandra Farrell	Friends of Hedionda Creek	<p>There appears there may be errors in the Parcel Acquisition List.</p> <p>1. Several LA numbers are listed for the same parcel. Just looking as one small area, according to land use parcel maps, LA-34 and LA-64 are shown as one parcel. LA-111 and LA-42 are also shown as one parcel as are LA-10 and LA-06. (see image A) Please explain this discrepancy. Is there a reason why some parcels were broken up into several LA numbers?</p> <p>2. There appear to be other errors in the parcel Acquisition List. For instance, LA-41 should not be listed as a top ranking opportunity. See image B The land is mostly cleared and contains a late 1950s single-family residence. It is part of a 1950s subdivision .</p> <p>However, LA- 34 and LA-64, undeveloped stretches of the Agua Hedionda Creek, containing native habitat, and part of a recognized wildlife corridor connecting the MHCP and NCMSCP, are shown medium priority. Parcel LA-64 serves as a collector, collecting water from adjacent mountains and funneling it into Agua Hedionda Creek. LA-34 contains a large pond. LA 34 and LA-64 are shown on the Draft North County MSCP maps to have high habitat quality and are within the County’s PAMA for the North County MSCP. In the Acquisition</p>	<p>Multiple LA numbers are listed for the same parcel because the parcel was subdivided between the analysis and the final version of the database.</p> <p>The parcel prioritization is based on GIS data, which provides a means of quantitatively prioritizing opportunities across an entire watershed. However, GIS analysis will produce some errors at the site level.</p> <p>Stakeholders were provided opportunities for comment on the LA opportunities during the review of Land Acquisition and Restoration report. Tetra Tech cannot address comments on individual parcels at this stage of the process. Parcels can be removed or added to the list during plan implementation as needed.</p> <p>Comments on LA-41 and other parcels were provided after the Atlas Maps review period and could not be addressed in the final list. These comments were listed in the “Stakeholder_Comments” tab of the Opportunity Database so that these issues could be considered during plan implementation.</p>

Page#	Line#	Name	Organization	Comment	Response
				<p>and Restoration Opportunity Report, Table B-2, the LA numbering system is arranged so that the composite score decreases as the numbers increase. LA-1 has a composite score of 7.9 while LA-100 has a composite score of 6.6. Given this LA –34 with a composite score of 7.5 rates higher than LA-44. Acquisition and Restoration Opportunity Report doesn't give clear detail to understand why some parcels with high habitat value and presence of either water or riparian vegetation are medium value while a property with a residence is rated high. Please verify the data and check it against aerial photos. LA-64 and LA-34 meets many criteria listed in the Acquisition and Restoration Opportunity Report. They serve to link to larger blocks of natural habitat and is the one link between other parcels listed as high priority. In addition, LA-64, LA-114, LA-34, LA-12, LA-64, LA-111, LA-42, LA-10, LA06 and others are all part of one large block and owned by the same landowner. Under section 2.4 it states, "The opportunities are defined in terms of parcels so that contiguous areas owned by one landowner can be targeted for land acquisition or restoration. This level of organization helps identify promising opportunities that require coordination with a minimal number of property owners." (see image C)</p> <p>Another example is Parcel LA- 133. It's rated medium contains but it constrains a large pond, a large amount of riparian vegetation and has been the site for riparian restoration which was carried out several years ago by Helix Environmental. The site is beginning to show the impacts of Arundo, which was imported to the site from the adjacent development so it is a candidate for invasive eradication and wetlands restoration. It is shown in Figure 2-4 Estimated Future (2030) land use within this report and in Figure10, Planned land Use within the Agua Hedionda Watershed (Final 2030 City/county Forecast), as designated' Open ". Why is this parcel considered medium priority for acquisition?</p>	

Page#	Line#	Name	Organization	Comment	Response
6-21	Fig. 6-6	Sandra Farrell	Friends of Hedionda Creek	No wetland restoration opportunities appear to be shown for the upper sections of Agua Hedionda Creek. This section includes several ponds. The area has had some problems with invasive species but this section does provide opportunities for wildlife and aids in the quality of the water as it travels down stream.	A request for wetlands restoration opportunities was forwarded to the WPG earlier this year. The ponds in the upper part of the watershed were not recommended as restoration opportunities at that time and therefore not included on the list. These opportunities could be recommended to the watershed council during plan implementation.
6-39	Fig 6-10	Sandra Farrell	Friends of Hedionda Creek	Please explain why the upper section of Agua Hedionda Creek shows no monitoring stations and no data was supplied for this section of the creek. During the 2007 visit with Clayton Creager, although it was very dry and the large pond in the northern section was dry, a stone well north of the pond had water about 4 feet down from the rim. In addition, the section of Agua Hedionda Creek just north of Las Posas Road and the ponds just to the south were full of water. It appeared that much of this water was coming from run off from an adjacent development. Due to increased water from the adjacent development, many animals can not use the wildlife undercrossing that was built during the extension of Las Posas road. Since water from the upper reaches of Agua Hedionda Creek would impact water quality down stream it is important to monitor sections of Agua Hedionda Creek.	Tetra Tech did not conduct water quality monitoring as part of this project.



Page#	Line#	Name	Organization	Comment	Response
6-51	19-21	Sandra Farrell	Friends of Hedionda Creek	As stated previously L-41 was listed in error and removed from this list. It is a single family residence in the Morganita Heights development	Comments on LA-41 and other parcels were provided after the Atlas Maps review period and could not be addressed in the final list. These comments were listed in the "Stakeholder_Comments" tab of the Opportunity Database so that these issues could be considered during plan implementation.
7-17	27	Sandra Farrell	Friends of Hedionda Creek	<p>Why does Low density residential generate more run off than medium density residential? Wouldn't more surface area be covered by impervious surfaces in a medium density residential than in a low density residential? If not please explain why. Please provide more detail to what is meant by low, medium and high residential. Please put it into dwelling units per acre so the public can accurately understand the key point of the table.</p> <p>In J-2 , line 6-7 it states," Medium Density Residential – A cluster design is used, grouping the housing units closer together on smaller lots, and leaving one-third of the site as undeveloped open space. Impervious area is reduced by decreasing driveway length, sidewalk use, and overall road footprint." But no similar description is given for low density residential.</p>	<p>Corrected - Low density residential does not have any BMP treatment applied since it is not considered a priority project according to current regulations. The assumptions are discussed more fully in the Agua Hedionda Watershed Modeling and Geomorphic Analysis Report.</p> <p>The lot size was added to Table 2-1.</p>

Page#	Line#	Name	Organization	Comment	Response
7-21	3	Sandra Farrell	Friends of Hedionda Creek	It may be good to mention coordination of LID education with other agencies. Currently the County has LID training in place and has visited some of the public meetings at the Planning Group/Sponsor Group level to educate the public	
48	14	Albert Cerda Jr	San Luis Rey Band of Mission Indians	Change to: These local descendants are known as members of the San Luis Rey Band of Mission Indians	Corrected
48	14	Albert Cerda Jr	San Luis Rey Band of Mission Indians	Omit : formerly	Corrected
61	28	Albert Cerda Jr	San Luis Rey Band of Mission Indians	Typo error: change "it" to " If a project ....	Corrected
Exec. Summary / Introduction		Marci L. Koski	U.S. Fish and Wildlife Service	This is a very comprehensive document with a lot of very good information. However, the executive summary and/or introduction should have a more explicit statement explaining who the management plan is designed for; i.e., who will use it, and for what. Also include a summary of how the plan would be implemented.	The plan contains this information to the extent that responsibilities are known at this time. Responsibility for implementing the plan will need to be further designated during implementation. The creation of a watershed council will be an important first step.

Page#	Line#	Name	Organization	Comment	Response
Section 6		Marci L. Koski	U.S. Fish and Wildlife Service	There are several maps that show restoration and enhancement opportunities for buffers, wetlands, and streams. We appreciate the scientific analysis that was implemented to identify these sites. However, restoration and enhancement actions may be restricted based on the landowner’s willingness to allow these activities, or other projects that are already being implemented (e.g., a reach of stream and its buffer is already required to be restored through a mitigation requirement from development). It seems like one of the reasons for presenting the information in these maps is to identify potential areas that may serve as mitigation for project impacts; however, if certain areas are already being used as mitigation, they couldn’t be used again. Can these areas be identified and marked as being unavailable for mitigation?	The opportunities are recommended for implementation by multiple funding sources, including mitigation.
A-5	Table A-3	Marci L. Koski	U.S. Fish and Wildlife Service	Please indicate what the open circles mean (vs. filled circles and no circles).	This was provided on lines 6-7 on page A-2.
4-2	29	Marci L. Koski	U.S. Fish and Wildlife Service	This sentence indicates that the future scenario was modeled using development associated with Vista. Were other cities (e.g., Carlsbad, San Marcos, Oceanside) considered?	The sentence describes “redevelopment” only and includes parcels in other jurisdictions in addition to Vista.
4-14	1	Marci L. Koski	U.S. Fish and Wildlife Service	California least tern was identified in and around the lagoon in this list; however, Table 4-3 (p. 4-11) indicates that the least tern has been extirpated from the lagoon. Please ensure that this is not conflicting information.	The database that tracts sensitive species in CA lists this species as extirpated. As stated in the document, the California least tern <u>has been observed</u> in the vicinity of the lagoon but is not believed to nest within the watershed due to absence of foraging habitat.

Page#	Line#	Name	Organization	Comment	Response
5-4	36-38	Marci L. Koski	U.S. Fish and Wildlife Service	This is an important statement, and needs to be elaborated on, especially in the introduction (see my first comment, above). Who will implement this plan? What people will be involved in the watershed-wide coordinating organization? What authority will they have to implement the plan?	Details added under Section 7.1.6 High Priority Action A.
Section 6		Marci L. Koski	U.S. Fish and Wildlife Service	Several figure references were simply noted as “0” (e.g., p. 6-4 line 39, and p. 6-5 line 16).	Corrected.
6-46	32-33	Marci L. Koski	U.S. Fish and Wildlife Service	This paragraph states that “most of the acquisition and restoration projects outlined in the WMP are suitable projects for mitigation”. Does this statement take into consideration existing mitigation obligations that may already exist on lands identified as having restoration or preservation potential? What about the willingness of underlying landowners to allow such projects?	Information available on land protected from development was used, which included some land preserved by mitigation. Landowner outreach will occur in the implementation phase of the plan.

Page#	Line#	Name	Organization	Comment	Response
6-48	3	Marci L. Koski	U.S. Fish and Wildlife Service	This list mentions both mitigation banks and in-lieu fee programs. Careful discussion will need to occur between project proponents, local jurisdictions, and the wildlife agencies because wetland/riparian mitigation requirements must meet specific conditions. For example, in-lieu fee programs might be able to fund restoration and enhancement projects, but mitigation may not necessarily take the form of in-lieu fees due to the requirement of meeting no-net-loss standards. Similarly, mitigation banks would need to be established with a formal banking agreement through CDFG and many areas may not be eligible as mitigation banks if it is just preservation or enhancement – we would typically prefer substantial restoration or wetland/riparian creation to count as mitigation banking credits. Also, many of these potential areas would already be protected or have restoration obligations on them per existing plans (e.g., the Carlsbad HMP requires buffers and restoration in some areas).	Footnote added to address this.
7-5	22-23	Marci L. Koski	U.S. Fish and Wildlife Service	You might also want to mention here that a section 7 consultation under the Endangered Species Act may be required if a Corps 404 permit is needed, particularly in the case where a project will be in critical habitat or where endangered species are located.	Text added as requested.
7-21	11	Marci L. Koski	U.S. Fish and Wildlife Service	Because the Carlsbad HMP is a subarea plan under the MHCP, a brief statement of this plan should be included in this section; also, the Oceanside subarea plan is on its way towards completion.	Statements on these 2 plans were added.

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