

**North and Central Orange County IRWM Plan - Public Review Draft of the 2017 IRWM Plan**

**Written Comments Received During the November 8, 2017 to December 22, 2017 Public Comment Period**

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#	Commentor	When/ How Received	Page*	Location*	Comments	Response / Recommended Edits	Plan Change Made (Y/N)
1	Marc Marcantonio, General Manager, Yorba Linda Water District	11/21/17 Email to Iris Corpus, County of Orange	n/a	n/a	It seems the plan is silent about the critical role of water in fire protection; critical function of water utilities, and in many cases the fire mission accounts for 60-70% of the infrastructure needs of a water utility. Typical fire protection missions of water utilities centers around domestic home, business, and industrial building fires, but in Orange County we are faced additionally with a significant wildfire mission. Water for environmental purposes is mentioned in the plan, but not with respect to the protection of critical habitat from wildfire. I would recommend future iterations of this plan address providing adequate and abundant water for all fire-fighting missions as well.	The importance of adequate water supplies for fire protection was discussed with The OC Plan Ad Hoc Committee; additional information was approved and included in Sections 2.3, 3.3.1, 3.3.6 and 3.8.	Yes
2	Alex Waite, Sr. Management Analyst, City of Tustin	11/29/17 Email to Iris Corpus, OC Public Works	n/a	Section 1	Seems like some of the sections should be moved. Section 1.2 discusses the History of the plan and 1.3 discusses the Governance of the plan. It seemed like 1.3.1, 1.3.1.1, and 1.3.1.2 should be moved under history and 1.3.2, 1.3.3, etc. moved directly under 1.3. It is a little frustrating have to go to section 1.3.2 and then back to 1.3 to find definitions. And just an FYI, "collaboration" was used 37 times in 32 pages.	After additional review of these sections, it appears to be appropriate that Section 1.3.1, 1.3.1.1, and 1.3.1.2 remain in the location presented. Section 1.2 is meant to be a brief history to what led to development of The OC Plan and an intro to the next section, Section 1.3. To make it more clear, the Section 1.3 title has been changed to "IRWM Plan Development and Governance".	No
3	Alex Waite, Sr. Management Analyst, City of Tustin; Jian Peng, Chief Water Quality Planning, OC Watersheds; Beatrice Musacchia, Environmental Engineering Specialist, County of Orange	11/30/17 - Email to Jian Peng, then to Beatrice Musacchia, then to Jenna Voss and Marilyn Thoms of County of Orange, then to Iris Corpus	3-11	Section 3.3.3	Language regarding the sediment TMDL you may want to address: "a. Loss of estuarine habitat in Upper Newport Bay continues. Sedimentation of Upper Newport Bay has been reduced over the past 20 years by upstream sediment control improvements, facility maintenance, and the Upper Newport Bay Ecosystem Restoration Project. However, these efforts must be continued, and new sediment control efforts will be necessary in the future to prevent further losses of estuarine habitat in Upper Newport Bay." This statement is outdated. Currently the sediment is well under control and we have met all of the key Sediment TMDL targets. While we are committed to continue the sediment control efforts, we are entering into the maintenance mode. With sea level rise and climate change issues that could bring further changes to the Bay and even require sediment input to keep up with rising sea level, we are adopting a more holistic approach to sediment management. Would be a good idea to update this statement.	Updated language within information provided on current status of sediment control and management.	Yes

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4	Alex Waite, Sr. Management Analyst, City of Tustin	12/12/17 - Email to Iris Corpus, Marilyn Thoms, and Marsha Westropp	4-23; 4-30	Section 4.4.3; Section 4.5.2	<p>1. Restoring native habitat strategies (Section 4.4.3) - discusses removing urban runoff and not supplementing the water. In that situation the channels will be dry. That is fine, if that is what you are going for, but I see that as removing a habitat. Related to this, I did not see in this section (4) or section 3, mention of stormwater diversions. As more diversion systems go on line to treat TMDLs and other NPDES issues, water will be removed from the channels. The scenario of less water going to flood control channels and the creeks should be discussed. Water is being diverted to the recharging basins, but it does have an impact on channel habitat.</p> <p>2. In the same section (4.4.3), there was a brief mention on re-establishing native aquatic biotic communities along stream courses. I'd like a little more clarity on this issue. I'm assuming this does not mean going into the channels and removing the concrete, but maybe it does.</p> <p>3. The end of the document discusses Coastal Benefits for DAC (Section 4.5.2). This time Newport Bay got left out as destination for DAC and the HB area was the focus. It also mentions the region is providing catch basin inserts to DAC. Who is doing that and who is funding the maintenance costs to keep them functioning?</p> <p>4. Using the word "strategies" 90 times in 30 pages seems excessive, and I don't think that included abbreviated forms of the word as in RMS (Resource Management Strategies). On the positive side, there weren't as many run on sentences in this section as in the previous ones.</p>	<p>1. Text has been refined to clarify reducing negative impacts of surface runoff to riparian ecosystems.</p> <p>2. Text has been refined to indicate projects will be introduced for protection and enhancement of natural resources, and "along stream courses" has been removed.</p> <p>3. Removed listing of habitat areas and referenced to Water-Dependent Recreation RMS section.</p> <p>4. Editing has been done where to reduce repetitive language.</p>	Yes
5	Alex Waite, Sr. Management Analyst, City of Tustin	12/20/17 - Online	2-11	Section 2.1.2.2	3rd Paragraph - Brea Dam: "Normal dry weather storage is about 1 acre-foot." That seems small. Is it really only 325,851 gallons and a foot deep?	This information is consistent with the U.S. Army Corps of Engineer information as footnoted.	No.
6	Alex Waite, Sr. Management Analyst, City of Tustin	12/20/17 - Online	2-12	Section 2.1.2.3	Can you provide a map of the Talbert Watershed?	Reference to the Talbert Watershed has been removed since it is part of the Santa Ana River Watershed.	Yes
7	Alex Waite, Sr. Management Analyst, City of Tustin	12/20/17 - Online	2-16	Section 2.1.3.1	Second Paragraph: What changes in land use are you talking about. You haven't mentioned any up to this point. Delete.	Text has been revised to generalize changes in land use.	Yes
8	Alex Waite, Sr. Management Analyst, City of Tustin	12/20/17 - Online	2-18	Section 2.1.4	My understanding is that the {Watershed Management Plans} were never completed.	Yes, the WMPs have been completed for each of the three WMAs.	No
9	Alex Waite, Sr. Management Analyst, City of Tustin	12/20/17 - Online	2-32	Section 2.2.2 (was 2.1.7.2)	First Paragraph: You were talking about Metropolitan Water and suddenly switch to IRWD. You need some form of intro to IRWD here. Are they a partner, user, supplier?	Text has been revised to transition to IRWM augmenting imported water into the Region.	Yes

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10	Christy Suppes, Senior Environmental Resource Specialist, OC Public Works/ Environmental Resources	12/19/2017 - Email to M.Westropp	1-11	Section 1.1.1	Edits to DAMP: In first paragraph - Delete "and Watershed Action Plans". Delete "Watershed Action Plans developed in 2006 complement the DAMP and describes watershed-based compliance efforts." Delete "and is periodically updated."	Edits were made to update the information accuracy. Changes have been made.	Yes
11	Christy Suppes, Senior Environmental Resource Specialist, OC Public Works/ Environmental Resources	12/19/2017 - Email to M.Westropp	5-7	Section 5.3.1	Third paragraph: Refine the second sentence to read, "In 2006, the County of Orange, in cooperation with the NPDES stormwater permittees, developed Watershed Action Plans to capture the regional efforts undertaken to provide a watershed-based collaborative effort to address constituents of concern in a specific watershed. In 2009, the Watershed Action Plans were incorporated into the Watershed Infiltration and Hydromodification Management Plans (WIHMPS), integrating stormwater and TMDL efforts." Refine last sentence to read, "The latest draft of the new NPDES stormwater permit for Orange County requires the creation of Watershed Master Plans, which will build upon the WIHMPS to will integrate water quality, hydromodification, water supply, and habitat."	Edits were made to update the information accuracy. Changes have been made.	Yes
12	Charles Busslinger, Principal Engineer, MWDOC	12/20/2017 - Email to Iris Corpus	Multiple	Section 2	General - Map Color Choices: Several Maps (Fig 2-10, 2-12, etc.) use similar colors to indicate Watershed Management Area limits which are difficult to see for those with colorblindness (particularly between Central WMA and South WMA). Suggest: use <a href="http://colorbrewer2.org/">http://colorbrewer2.org/</a> developed in conjunction with the National Science Foundation (Select: Show only Colorblind safe, and Qualitative Nature of Data) for color choice selections.	All figures have been edited with color changes as suggested.	Yes
13	Charles Busslinger, Principal Engineer, MWDOC	12/20/2017 - Email to Iris Corpus	1-20	Section 1.3.7.1	Change reference from 'Section 2.5' to 'Section 2.3 Jurisdictional Boundaries'. Multiple section references throughout the document need to be verified.	More appropriately changed to reference Table 2-11.	Yes
14	Charles Busslinger, Principal Engineer, MWDOC	12/20/2017 - Email to Iris Corpus	2-20	Section 2.1.7	Water Supplies: 'The beneficial uses of surface waters are primarily ecosystem processes and recreation rather than municipal drinking water or industrial uses.' Is this correct for North WMA? There are 24 deep basins and Prado Dam with over 1,000 acres of wetted recharge and a maximum surface storage capacity of 51,115 Acre-Feet (per WACO Water Supply Report)	Language has been revised to represent the Region.	Yes

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15	Charles Busslinger, Principal Engineer, MWDOC	12/20/2017 - Email to Iris Corpus	2-27	Section 2.1.7.2	Imported Water: 1st paragraph, 4th sentence – “The local water supply is more critical in that it provides approximately 75 percent of the local potable supply improving overall water supply.” This is awkward as imported water is the subject of this sub-section. The basin also uses imported untreated water to meet basin replenishment needs. Suggest: “The local water supply provides approximately 75 percent of local potable supply (or simply make this truncated reference in the section 2.1.7 under the more general section of Water Supplies). Untreated imported water is used to replenish the groundwater basin.” [This equates to about 30% of all water supplies are imported]. NOTE: We are currently pushing for the California Water Fix as a critical component to Southern California water reliability. We should not imply imported water is anything but ‘critical’.	Made changes within Section 2.1.7.2 as recommended, with minor edits.	Yes
16	Charles Busslinger, Principal Engineer, MWDOC	12/20/2017 - Email to Iris Corpus	2-66	Section 2.3	Jurisdictional Boundaries: Descriptions of various stakeholder groups are scattered throughout the document (Earth Resource Foundation, Latino Health Access, and OC Coastkeeper in Section 1.3.7.2, while other organizations are described in section 2.3. This leaves readers to ‘hunt’ for information on stakeholders throughout the document. Table 2-11 lists stakeholders but the descriptions are not consistently as complete as in other sections. Suggest: Consolidate stakeholder group descriptions in one location to provide readers a central reference point (even if redundant). Table 2-11 could be used for this purpose.	Table 2-11 has been moved to Appendix D and represents agencies that have jurisdiction within the Region. Sections of the plan also reference many of the same jurisdictional agencies and organizations where appropriate. In addition, stakeholder groups that do not have specific jurisdiction are referenced, although not included in Appendix D.	Yes
17	Charles Busslinger, Principal Engineer, MWDOC	12/20/2017 - Email to Iris Corpus	2-29	Figure 2-13	Having trouble distinguishing between highways and ‘Not Designated’ pipelines. If any pipelines are not identified, please let MWDOC know and we can identify them.	Figure has been updated.	Yes
18	Charles Busslinger, Principal Engineer, MWDOC	12/20/2017 - Email to Iris Corpus	2-31	Figure 2-14	Suggest: Identify the Yellow pipeline as an Ocean Outfall in the legend.	Figure has been updated.	Yes
19	Charles Busslinger, Principal Engineer, MWDOC	12/20/2017 - Email to Iris Corpus	2-31	Section 2.1.7.3	Recycle Water - GWRS: Check the conversion calculation after ‘70 mgd to 100 mgd’ i.e. ‘(307 AF)’. Should be presented in either cubic meters per day or Acre Feet per Year: ‘70 MGD (265,000 CMD or 78,400 AFY) and 100 MGD (378,000 CMD or 111,800 AFY); and additional 30 MGD (114,000 CMD or 33,600 AFY). Cubic meters per day per OCWD Technical brochure: <a href="https://www.ocwd.com/media/4267/gwrs-technical-brochure-r.pdf">https://www.ocwd.com/media/4267/gwrs-technical-brochure-r.pdf</a>	Text has been revised to include only million gallons per day (MGD) and acre feet (AF).	Yes
20	Charles Busslinger, Principal Engineer, MWDOC	12/20/2017 - Email to Iris Corpus	2-39	Section 2.1.7.6	Projected Water Demands: 4th paragraph – Suggest: adding examples of Active measures such as rebates for washers or toilets whose water efficiency exceeds passive plumbing code requirements, or rebates for drip irrigation systems, irrigation timers, or turf removal.	Examples of Active measures have been added as suggested.	Yes
21	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	TOC-1	Table of Contents	(1) The IRWM Plan Standard from the DWR 2016 IRWM Guidelines, Technical Analysis, appears to be missing and perhaps should be called out as a specific section or subsection.	Section 1.6 Technical Analysis has been added.	Yes

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22	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-1	Footnote	(2) Proposition 1 directs DWR to "establish three funding areas that reflect the watersheds of San Diego County and southern Orange County (designated as the San Diego subregion), the Santa Ana River Watershed (designated as the Santa Ana subregion), and the Los Angeles and Ventura County watershed (designated as the Los Angeles subregion), and shall allocate funds to those areas..." The OC WMA described in the plan is within the Santa Ana River watershed subregion.	Comment noted; no change requested.	No
23	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-3	1st Paragraph	(3) A sentence states that the Santa Ana River Watershed is within the North OC WMA. This statement is inaccurate since the Santa Ana River Watershed extends well outside North OC WMA into the Upper SAR Watershed and also encompasses Central OC WMA as recognized by DWR.	Agree clarifying language will define that The OC Plan Region only encompasses a portion of the Santa Ana Watershed.	Yes
24	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-5	1st three bullets at bottom of page	(4) Introduction: Reference is made that the water management areas constitute an "IRWM region" in all three bullets. These statements are inaccurate based on the DWR IRWM regional acceptance process which defines and acknowledges IRWM regions accepted by the State. North and Central OC WMAs are contained within the IRWM Region No. 29 Santa Ana Watershed Project Authority. North and Central OC WMAs are not recognized or accepted IRWM regions and should not be described as such as per the DWR RAP-accepted IRWM 48 IRWM Planning Regions Updated: August 2017.	The "IRWM Region" in The OC Plan is defined as the area within the North and Central Watershed Management Areas. This term is used in a similar manner as other IRWM plans within the Santa Ana River Watershed. For an example, please note the Integrated Regional Water Management Plan for the Upper Santa Ana River Watershed where the "IRWM Region" is defined as the "Upper Santa Ana River Watershed (USARW) Region." It is understood that the USARW Region is not based on the DWR IRWM regional acceptance process. There is no statement within The OC Plan that claims that the North and Central Orange County IRWM Region has been accepted as a region through the DWR Regional Acceptance Process. The statements on page 1-5 are accurate.	No
25	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-11	Section 1.3.1	(5) IRWM Plan Development: No mention is made of the significant integration and involvement by OC Plan agencies in the IRWM plan for the Santa Ana River Watershed known as SAWPA's One Water One Watershed (OWOW) Plan which includes the North and Central OC WMAs and its previous plans that were incorporated as part of the OWOW plan. A paragraph describing the OWOW Plan is important to add in this list of other related planning.	The section cited on page 1-11 describes the planning efforts within Orange County for The OC Plan. Section 1.5 describes coordination outside of Orange County and has a section on page 1-30 that includes a paragraph on the OWOW plan and OC stakeholder participation in preparation of the OWOW Plan.	No
26	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-14	OC SWRP	(6) This paragraph should state that the OC SWRP was submitted to the accepted IRWM region governance, SAWPA's OWOW Governance, and approved for acceptance as part of the IRWM, the OWOW Plan.	Language has been added as suggested.	Yes
27	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-16	Section 1.3.2	(7) Regional Water Management Group: This introductory paragraph of this section seeks to define some CWC requirement to be recognized as a RWMG. This description is incomplete since it fails to recognize DWR's established Region Acceptance Process as defined under CWC Sec 10541(f), which states that in order to be recognized as a RWMG, the entity must comply with DWR guidelines and standards for identifying a region for the purpose of developing or modifying an IRWM Plan.	The OC Plan has been drafted to conform to state standards as described in Section 1.3.2. This section describes state requirements regarding governance related to IRWM planning efforts. As such, the stakeholders in the North and Central Orange County IRWM Region adopted the governance structure as described in The OC Plan. The state does not prohibit the drafting and adopting of local IRWM Plans. Nor does the state prohibit the use of specific terms in local IRWM Plans. The terminology in The OC Plan regarding governance is similar to the terminology used in other local IRWM Plans. Please note, for example, the designation of Basin Technical Advisory Committee as the official "Regional Water Management Group" in the Upper Santa Ana River Watershed IRWM plan.	No

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28	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-20	Sections 1.3.6 and 1.3.7	(8) SAWPA staff actively participated in both the Ad Hoc Committee and Stakeholder Committee meetings for the OC Plan for the duration of the planning effort but no mention or listing is included in the text or table or anywhere in the subsequent section. Further, SAWPA staff provided extensive comments on the OC Plan Goals and Objectives which were not accepted. As the DWR recognized IRWM region overlying the North and Central [OC] WMAs areas for this planning, SAWPA should be included in Table 1-1. SAWPA is also not listed under 1.3.7.2 Additional Organization Outreach and Participation in the IRWM Region either. SAWPA staff attended over six of the outreach meetings held with the stakeholders and ad hoc groups and closely coordinated efforts in updating the OWOW Plan Update 2018 as North and Central OC Plan was being developed.	While some IRWM regions elect to identify participating agencies and organizations in each stakeholder and other meetings, identification of specific participants is not required under the DWR 2016 IRWM Guidelines, Section 14. Stakeholder Involvement, pgs 41-42, and DWR's IRWM Plan Standards Checklist. The OC Plan does not include a listing of participants, but rather discusses overall involvement and the process to engage the stakeholders, as required. However, SAWPA has been added to Section 1.3.7.2. A document dated 5/22/17 from SAWPA with suggested edits to Draft Goals and Objectives was considered by the Ad Hoc Committee. Suggested changes incorporated into the final version include: WQ-1 Strategy A: Added "and TMDL"; WQ-2: Changed "Maintain" to "Protect"; WS-1 and 2 Strategy A: Redrafted to "Optimize use of imported water in times of surplus"; WQ-1 and 2 Strategy D: Added "water conservation"; ECO-1 Strategy D: Deleted "Construct wetlands" and Strategy F "Integrate wetland and ecosystem restoration with water quality goals"; QL-1: Redrafted using SAWPA's suggested language; QL-1 Strategy A: Red; Redrafted using SAWPA's suggested language; ACC-3: Redrafted using SAWPA's suggested language. Suggested changes to FM-1 Strategies B and C and FM-2 Strategies A were not accepted as the existing language was specifically drafted and approved by Orange County Flood Control, and the Stakeholder Group wished to defer to Flood Control. The comment to add another objective to FM-2 to "Support stormwater management" was not accepted as the Ad Hoc committee determined that it was more appropriate in the Region to cover stormwater management under Water Quality and Water Supply than Flood Control. This was a topic of extensive deliberation by the Ad Hoc Committee. Suggestions to eliminate strategies rejected by the Ad Hoc Committee because they were deemed to be important to the Region included: WQ-2 Strategy A; WS-1 and 2 Strategy B: [final strategy was slightly modified]; WS-1 and 2 Strategy E; QL-2 Strategy A; QL-2 Strategy E; QL-2 Strategy F. Suggestions to add new strategies were not accepted where the projects to implement these strategies would be either watershed-wide efforts or would be constructed in the upper watershed outside of Orange County; The OC Plan is focused on projects within Orange County. Strategies and potential projects outside of Orange County are covered in the Santa Ana River Watershed's OWOW plan. Additional strategies suggested by SAWPA were not approved for addition.	Combined Yes and No
29	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-25	Section 1.3.9	(9) Appropriateness of Region and Geographic Boundaries: No mention is made in regards to the North and Central OC WMA being located within the accepted IRWM boundaries for the Santa Ana River Watershed and SAWPA and should be included and described.	Language regarding the relationship between the boundaries of the Santa Ana Watershed, the OC Region and its WMAs, and SAWPA, has been added in Section 1.3.9.	Yes
30	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-29	Section 1.5	(10) Coordination: The 2nd sentence of this section is inaccurate. The OC Plan region is entirely within the Santa Ana Watershed Project Authority IRWM region as recognized by DWR and is not an adjacent region.	The relationship between The OC Plan Region and the Santa Ana Funding Area has been clarified in Section 1.5.	Yes
31	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-29	Section 1.5	(11) Coordination: The Gateway IRWM region is also contiguous to the WMA area. Has Orange County engaged with them?	The Planning and Stakeholder Groups are aware that The OC Plan region is contiguous to the Gateway IRWM region within Los Angeles County, and will work collaboratively and coordinate with them on implementation of IRWM areas of common benefit.	No
32	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	1-30	Section 1.5	(12) Santa Ana IRWM Plan: The original SAWPA integrated watershed plan was developed in 2002, not 2005. It was also updated in 2005 then later as the OWOW Plan in 2010 and 2014 as stated. The title of this paragraph should read "Santa Ana River Watershed IRWM Plan."	The date of the original Santa Ana River Watershed IRWM Plan has been corrected to 2002. The title of the paragraph is changed to: Santa Ana River Watershed IRWM Plan.	Yes

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33	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-1	Section 2.1	(13) North and Central OC IRWM Region: As stated earlier, the North and Central OC WMA is not a recognized "IRWM Region" as identified by the State. Consequently, it is recommended that throughout this section this area be described as "Watershed Management Areas (WMAs)" only.	See response to Comment 24 (SAWPA Comment 4).	No
34	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-1	Section 2.1.1	(14) Watersheds, Adjoining IRWM Regions, and Overlapping Efforts: This section proposed to establish the WMAs as an IRWM region and its benefits. Based on the latest communication that SAWPA received from OCWD staff, there is no intention to establish a separate IRWM region from the DWR RAP accepted SAWPA IRWM region. Further, DWR staff has indicated they are not interested in bifurcating existing IRWM regions and would prefer that more of them combine together within Funding Areas. Discussion of establishing a new IRWM region in this plan is discouraged. Figure 2.1 describes the North and Central IRWM region as an existing region when an earlier statement indicates the value of "establishing" a new IRWM region. Since the North and Central IRWM region does not exist, the figure should be removed.	See response to Comment 19 (SAWPA Comment 4). Section 2.1.1 establishes the IRWM Region in The OC Plan to encompass both the North OC WMA and the Central OC WMA indicating a combining of two existing IRWM plans into one plan. Because the two watershed management areas prepared their own IRWM plans in the past, it was important in this new combined plan to explain the creation of the "new IRWM region" that encompasses the two separate "regions" or "WMAs". This section does not describe the local planning effort to "establish a separate IRWM region from the DWR RAP accepted SAWPA IRWM region." The comment that "DWR staff has indicated that they are not interested in bifurcating existing IRWM regions and would prefer that more of them combine together within Funding Areas" is not relevant as this is not the subject of this section. The comment that the "North and Central IRWM region does not exist" is inaccurate as The OC Plan, by definition, defines this area as the "IRWM region." This is consistent with the creation of other IRWM regions in other local plans within the OWOW IRWM region.	No
35	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-3	Figure 2-2	(15) The figure shown is inaccurate. The DWR accepted Santa Ana River Watershed includes the North and Central OC WMAs as well as the Newport Bay Subwatershed. All of these are in fact subwatershed areas under the Santa Ana River Watershed as reflected in Figures SC-3 and page SC-19 of the 2013 CA Water Plan Volume 2 Regional Reports.	Watersheds and sub-watersheds are defined differently by several state agencies. Maps (figures) have been refined for clarification of watershed boundaries and correct names for management purposes by the County of Orange.	Yes
36	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-5	Section 2.1.1	(16) Santa Ana River Watershed Hydrologic Unit: Based on recent recalculations, the SAR Watershed is 2840 sq miles in area instead of 2640 sq miles.	The reference to the Santa Ana River Watershed Hydrologic Unit has been deleted, as well as the following paragraph on the San Gabriel Hydrologic Unit. This information was not necessary in this section and hydrology is later discussed in Section 2.6.1.	Yes
37	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-5	Section 2.1.1	(17) Appropriate IRWM Region: First sentence states the OC Plan has an RWMG. This should be removed per SAWPA Comment 14. (comment 30 herein)	See response to Comments 24 and 34 (SAWPA Comments 4 and 14).	No
38	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-8	Figure 2-5	(18) The depiction of the Santa Ana River Watershed is inaccurate as per SAWPA Comment 15. (comment 31 herein)	See response to Comment 35 (SAWPA Comment 15).	Yes
39	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-17	Figure 2-9	(19) Please correct watersheds as suggested in SAWPA Comment 15. (comment 31 herein)	See response to Comment 35 (SAWPA Comment 15).	Yes

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40	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-17	Section 2.1.4	(20) Water Quality Studies: OCWD is also a member of the SAWPA Emerging Constituents Program Task Force formed to conduct periodic emerging constituents sampling, data management and communication. Addition of this study effort is suggested in this section.	Addition of the Emerging Constituents Program Task Force has been made to this section.	Yes
41	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-19	Section 2.1.5	(21) Human Right to Water: Referencing the State Board action is important; however, there is a Human Right to Water in California law which should be referenced. See: Water Code Div 1 Ch 1 Section 106.3.	Reference to state law added as suggested.	Yes
42	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-20	Section 2.1.6	(22) Economic Conditions: Discussion of disadvantaged community involvement and outreach being conducted by SAWPA in the Santa Ana River Watershed including North and Central OC WMAs should be included. The work reflects a significant effort to conduct needs assessment and water related issues facing disadvantaged communities and would supplement this section.	Text regarding DAC involvement and outreach being conducted by SAWPA in the Santa Ana River Watershed, the SAWPA DACI program, including North and Central OC WMAs has been added to Section 4.2, under subsection People and Water. While the comment recommends that program information be added to the description in Section 2.1.6, this section describes the strategies aimed at improving the quality of life in Orange County, which includes several strategies specifically addressing disadvantaged and low-income communities, and the economic conditions in the Region rather than a discussion of programs to address the needs of DACs.	Yes
43	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-21	Figure 2-10	(23) Recommend figure title: "Disadvantaged Community Census Tracts"	Title of figure is changed as suggested.	Yes
44	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-30	Section 2.1.7.2	(24) 1st line - Change misspelled "Stand" to "Strand".	Spelling correction made.	Yes
45	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-30	Section 2.1.7.3	(25) Recycled Water: 1st line - Replace "the IRWM Region" with the "North and Central OC WMAs." See previous SAWPA Comment 4 for justification. (comment 20 herein)	See response to Comment 24 (SAWPA Comment 4).	No
46	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-55	Figure 2-16	(26) Please revise Santa Ana River Watershed area. See previous SAWPA Comment 15. (comment 31 herein)	See response to Comment 35 (SAWPA Comment 15).	No
47	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-62	Section 2.2	(27) Groundwater Basin Salinity Management: Please add "SAWPA's" prior to "Basin Monitoring Program Task Force".	Clarification that SAWPA is the administrator of the Basin Monitoring Program Task Force has been added to the description of the "Salt and Nutrient Management Program" in Section 2-2.	Yes
48	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-64	Section 2.2	(28) Please modify the last sentence of the 1st paragraph - "The Basin Plan charges the Task Force administered by SAWPA with implementing a watershed-wide TDS/Nitrogen management program."	See response to Comment 47 (SAWPA Comment 27).	No



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49	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-65	Section 2.3 Table 2-11 (now Appendix D)	(29) Jurisdictional Boundaries: 2nd sentence - Replace "...the IRWM region..." with "the North and Central OC WMAs". Revise Table 2-11 to remove reference to "IRWM region".	See response to Comment 24 (SAWPA Comment 4).	No
50	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-66	Section 2.3 Table 2-11 (now Appendix D)	(30) SWRCB description should also mention oversight of water rights associated with the Santa Ana River 1969 Adjudicated Settlement.	Table 2-11 has been taken out of Section 2 and placed in Appendix D. Text regarding the State Water Resources Control Board's management of water rights for surface water in the watershed has been added.	Yes
51	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-66	Section 2.3 Table 2-11 (now Appendix D)	(31) Add SAWPA with a description as a JPA which includes OCWD as a member agency and which also overlies the North and Central OC WMAs.	SAWPA description has been added to Appendix D (Previously Table 2-11).	Yes
52	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-66	Table 2-11	(32) SCCWRP is not a federal or state agency but rather a JPA. Its primary role is water quality research.	Confirmed SCCWRP's formation on their website. While they were formed as a JPA, they also call themselves a "public agency". Added "created as a joint powers authority" to provide additional clarification. Also, added "AND JOINT POWERS AUTHORITIES" in title of table section.	Yes
53	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-95	Section 2.7	(33) A more detailed analysis of climate change impacts of the Santa Ana River Watershed as compared to the DWR Plan was conducted as part of SAWPA OWOW 2.0 Plan Update in 2014. This analysis was conducted by the US Bureau of Reclamation and involved close coordination with SAWPA member agencies including OCWD. Analysis also included more detailed evaluation of sea level impacts along the OC coastline. This analysis should be reflected in this section as more updated and focused impact analysis than the 2009 CA Water Plan.	The Climate Change Analysis for the Santa Ana River Watershed by the U.S. Bureau of Reclamation document has been added to the list of climate change studies as suggested.	Yes
54	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	2-101	Section 2.7	(34) The list of climate change studies should include the OWOW 2.0 Plan Chapter 5.13 Energy and Environmental Impact Response, Appendix F1 SARW FAQs Regarding Climate Change and Appendix F2 Climate Change Analysis for the Santa Ana River Watershed, Santa Ana Watershed Basin Study, California, Lower Colorado Region.	The OWOW 2.0 Plan reference has been added to list of climate change studies as suggested.	Yes
55	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	3-13	Section 3.3.5	(35) C. People who live in low-income communities use beaches, creeks and wetlands for recreation. How the statement is currently framed does not acknowledge the people who are recreating and may be at risk if water quality is diminished. Also, it is likely that high-income people are using the same recreational opportunities. It may be valuable to consider the cost of water related services and the burdens it may have on low-income community members, to include rates, fees, and taxes. It is likely that low-income members of the region are challenged to meet the costs of water services, a quality of life issue that should be addressed if present.	Agree, this section has been refined to reflect all communities utilize waters within the Region. Water quality impacting recreational opportunities is already stated. In addition, language to reflect the challenges in meeting affordability of water problems has been added.	Yes

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56	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	3-13	Section 3.3.5	(36) D. We suggest revising this statement for accuracy. Remove "minority. Consider "Vulnerable members of the communities in the WMA are more likely to face environmental pollution and unhealthy conditions that are more wealthy communities. These environmental injustices present important water management issues."	Agree that this section should be refined to reflect disadvantaged and low-income members of the community, which describes "at-risk" more specifically.	Yes
57	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	3-14	Section 3.3.6	(37) We recommend an additional paragraph to address how climate change impacts will be felt inequitably by vulnerable populations and discuss unequal impacts and the need to focus on those most vulnerable when considering adaptation, and the cost of impacts.	Paragraph k. added to address climate change impacts felt inequitably by vulnerable populations. Such inequities have been listed.	Yes
58	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	3-18	Section 3.5	(38) As conveyed in previous comment letters regarding the OC Plan goals and objectives, " Provide Adequate and Reliable Water Supplies" goal and Objective WS-1: "Meet projected increase in water demands of 49,000 AFY by 2040 within the Orange County Basin area with consideration of cost-effective strategies" should include the following two strategies: a. Maximize Santa Ana River baseflow and stormwater runoff capture for groundwater basin recharge. b. Consider use of ocean desalination as long term supply strategy (This strategy is described on page 4-7 of the OC Plan)	See response to Comment 28 (SAWPA Comment 8).	No
59	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	3-20	Section 3.5	(39) As conveyed in previous comment letters regarding the OC Plan goals and objectives, "Integrated Flood Management" goal, its objectives and strategies do not appear to adequately address stormwater management and capture activities or efforts to work with SAWPA through its IRWM process to support such efforts. The following strategies were suggested to be added under this goal: a. Maximize capture of stormwater to recharge and replenish groundwater basin b. Collaborate with SAWPA through their IRWM process called One Water One Watershed (OWOW) to support efforts to maintain and enhance Santa Ana River flows and stormwater runoff capture.	See response to Comment 28 (SAWPA Comment 8).	No
60	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	4-11	Section 4.2	(40) 4th paragraph, 3rd sentence - Please modify sentence beginning to say "Formation of the SAWPA Nitrogen and TDS Task Force...."	Reference to SAWPA's leadership of the task force has been added to this section.	Yes
61	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	4-11	Section 4.2	(41) 5th paragraph, 1st sentence - Please modify sentence to say "The Basin Plan charges the agencies of new Task Force called the Basin Monitoring Program Task Force formed by SAWPA...."	See response to Comments 47 and 60 (SAWPA Comments 27 and 40).	Yes
62	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	5-1	Introduction	(42) 2nd paragraph, last sentence - OCWD has indicated that there are not plans to submit the OC Plan to the State to become a DWR-approved IRWM region separate from SAWPA IRWM at this time. Its is recommended that this sentence be removed.	The statement here clarifies that the project list will be kept current in this plan "if" The OC Plan Region becomes a DWR-approved IRWM region. This statement simply commits the stakeholders to maintaining an up-to-date list should at some point in the future the Region becomes a DWR-approved region.	No

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63	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	5-2	Section 5.2	(43) Ranking Criteria Development: In accordance with DWR IRWM plan standards, several review factors do not appear to have been considered or discussed in the ranking criteria as listed below: a. Technical Analysis or technical feasibility of projects b. Specific benefits critical for disadvantaged communities water issues c. Specific benefits to critical water issues for Native American Tribal communities d. <u>Environmental Justice Issues</u>	Text has been revised to clarify ranking criteria was established in accordance with DWR IRWM Plan Standards.	Yes
64	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	5-2	Section 5.2	(44) Ranking Criteria Development: 2nd paragraph, 2nd sentence The statement implies that notification and invitations of the ranking process were extended to those interested in participating. No such invitation was extended to SAWPA to participate in this process even through the plan states the projects will be submitted to SAWPA in the future. SAWPA is the approved RWMG for the legislated IRWM region that encompasses the OC WMAs.	The ranking process was conducted by an Ad Hoc Committee formed for this purpose. The Ad Hoc Committees were formed by the stakeholder group to conduct specific tasks on behalf of the stakeholders. Ad Hoc Committees were formed at stakeholder meetings and all stakeholders were encouraged to join. The second Ad Hoc Committee was created specifically at the stakeholder meeting to develop the project ranking process and all were invited to join in. SAWPA staff attended several Ad Hoc Committee meetings as acknowledged in Comment 24 (SAWPA Comment 8). Mark Norton of SAWPA attended Ad Hoc Committee meetings on 2/12/17 and 5/23/17 and Mike Antos, also of SAWPA, attended Ad Hoc Committee meetings on 6/27/17 and 8/29/17. No special invitations were extended to any individual stakeholders. The efforts of SAWPA's staff to be part of the effort of developing The OC Plan is greatly appreciated and SAWPA staff is welcomed to attend any future meetings.	No
65	Richard E. Haller, General Manager, via Mark Norton, Water Resources & Planning Manager, SAWPA	12/20/2017 - Email to Iris Corpus	6-7	Section 6.3.3	(45) Data Management System and Dissemination: An additional paragraph is suggested to discuss the extensive data collection, management and support conducted to assist OCWD and MWDOC as part of SAWPA's Prop 84 IRWM Drought grant program which provided extensive aerial survey data, land use and water use data by property and coding and classification data. These data will allow the OC Plan proponents to more effectively implement water use efficiency and water conservation measures through the study area in the years ahead.	Suggested text has been added.	Yes
66	Penny Lew, OC Public Works, Flood Control Division, Flood Programs/ Floodplain Management	12/20/2017 - Email to Iris Corpus	3-6	Section 3.2	Table 3-2, Statewide Priorities: For (8) Increase Flood Protection, consider checking off box for " (5) Improve the Quality of Life in OC".	Agree that Flood Control has an impact on quality of life; Table 3-2 has been updated.	Yes
67	Penny Lew, OC Public Works, Flood Control Division, Flood Programs/ Floodplain Management	12/20/2017 - Email to Iris Corpus	3-7	Section 3.2	Objective FM-2 reads "Improve floodplains". We do not know what this really means until we find it in...(Thought wasn't completed.)	Thought was complete in comment. Could assume meant "...until we find it in the stated Strategies on pages 3-20, with additional information on 3-12 and 3-17. No action required.	No

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68	Penny Lew, OC Public Works, Flood Control Division, Flood Programs/ Floodplain Management	12/20/2017 - Email to Iris Corpus	3-12	Section 3.3.4	Flood Management: "a". should read more like "Areas within the WMAs are not <u>fully</u> protected from the 100-year flood. <u>Many</u> Orange County regional facilities cannot convey the 100 year storm discharges. <u>Many</u> sub-regional facilities are also deficient.  "b." should read more like: "Long delays for regulatory permits for <u>capital improvement projects and</u> maintenance... and Orange County Flood Control District (OCFCD) to <u>improve and provide</u> maintenance or repairs to its flood control facilities..." " <u>Often times</u> improvements are designed...residential property."	Clarifying edits made as suggested.	Yes
69	Penny Lew, OC Public Works, Flood Control Division, Flood Programs/ Floodplain Management	12/20/2017 - Email to Iris Corpus	3-13	Section 3.3.5	Quality of Life in Orange County: Consider adding "g." to include something to the effect of: Prevention of flooding-minor or major, improves quality of life by protecting residents-their homes and property, and helps them go about day-to-day business more readily and safely.	This subsection is part of 3.3 Water Management Issues in Objective Areas. Adding a reference to the Quality of Life subsection would be appropriate and consistent with the change made in Table 3-2; refer to Comment 66.	Yes
70	Penny Lew, OC Public Works, Flood Control Division, Flood Programs/ Floodplain Management	12/20/2017 - Email to Iris Corpus	3-20	Section 3.5	For Goal 4, FM-1 the wording for "B. Improve flood control facilities and remove properties... for climate change on flow regimes". It's not clear what the intent is as "flow regimes" does not seem like the appropriate wording here. Hydraulically, it means laminar or turbulent flows regarding fluid friction.  For FM-2, Improve Floodplain, strategies A and B would be difficult to implement in the urban watersheds of NOC and COC. Obtaining right-of-way for naturalization efforts would be extremely challenging at best.	Since the Goals, Objectives and Strategies were adopted by the Ad Hoc Committee, this comment was presented to the Ad Hoc Committee on 1/9/18 for consideration. The Ad Hoc Committee approved removing the word "regimes" from the strategy. The same change was made to Appendix E, Weighting of Goals and Strategies and Appendix G, Goals and Objectives Prioritization.  Informaton related to challenges of reducing scour and erosion on canyons and channels, as well as obtaining right-of-way for naturaliation efforts has been added on page 3-12 to Section 3.3.4.	Yes
71	Penny Lew, OC Public Works, Flood Control Division, Flood Programs/ Floodplain Management	12/20/2017 - Email to Iris Corpus	3-24	Section 3.7	Change header for 2nd paragraph to "Flood Management" for consistency.	Agree to change for consistency of other headers in this section.	Yes
72	Penny Lew, OC Public Works, Flood Control Division, Flood Programs/ Floodplain Management	12/20/2017 - Email to Iris Corpus	n/a	Appendix D	Where can we get a copy of Appendix D?	Appendix D is The OC Plan Project List. The list is being developed through a Call for Projects in early 2018 and will be included in the final IRWM Plan.	No
73	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	n/a	Table of Contents	For Section 2.1.2.1, change "Harbor" to "Harbour" in title "Anaheim Bay-Huntington Harbour Watershed."	Spelling correction made. Will make global change throughout IRWM Plan.	Yes
74	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-1	Section 1.1	Define the "Region" at the end of the first paragraph. Second Paragraph: Eliminate the last sentence.	First Paragraph: The reference to "the Region" has been removed from the first paragraph in Section 1.1. and defined when referred to in later sections. Second Paragraph: The last sentence has been eliminated.	Yes

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75	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-4	Section 1.1	Second Paragraph, last sentence reads, "Each year, significant public funding is directed to stormwater and other water quality programs, including the protection of coastal ecosystems." Clarify where the funding is coming from. Fourth Paragraph: Eliminate the last sentence.	Second Paragraph: Public agencies with jurisdiction over stormwater and water quality programs expend funding from their revenue sources. Text has been revised for clarity. Fourth Paragraph: The last sentence has been eliminated.	Yes
76	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-5	Section 1.1	Fourth Paragraph: Shorten the sentence to only, "Orange County serves as the regional program administrator." Eliminate the balance of the sentence. Eliminate the fifth paragraph, as this information is previously stated. Last Paragraph - The WMA Governance Model. Explain what is the Governance Model, the purpose, and owner of it (date of document). Is this the same as the OC Governance Plan as depicted in Figure 1-2?	Fourth Paragraph: The sentence has been edited as suggested. Fifth Paragraph: Rather than eliminate this paragraph, it has been edited. Last Paragraph: Yes, The OC Plan Governance Model is what is depicted later in Figure 1-2. Therefore, the language in this paragraph has been changed to not refer to the governance model early.	Yes
77	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-6	Section 1.1	First Full Paragraph: Move and revise this paragraph to the section on page 1-3: "Why integrated planning is an appropriate approach."	The paragraph has been moved as suggested.	Yes
78	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-7	Section 1.2	First Paragraph: The Prop 50 grant is discussed in Phase 2 below [the next paragraph] so delete [the last] sentence.	First Paragraph: The last sentence has been deleted as suggested.	Yes
79	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-8	Section 1.2	First Paragraph: Where it says, "Development of the CCWMP encouraged interjurisdictional projects and planning to promote open lines of communication, cooperation and collaboration between agencies for improved management of shared resources and exchange among stakeholders in the Region." Explain what is being exchanged.  Section "North and Central OC IRWM Plan (The OC Plan): Suggest moving the entire section to Section 1.3.1 IRWM Plan Development.	First Paragraph: "Exchange" is referring to discussion and collaboration among stakeholders. This reference has been deleted.  North and Central OC IRWM Plan section: See response to Comment 75.	Yes
80	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-12	Section 1.3.1	Last bullet in first section: "Ensure continued water security." Explain what is meant by "water security", is it to make sure that there is water in the future, the quality of potable water, or...?	Last bullet: Language has been changed to, "Ensure sufficient water supplies to meet demands".	Yes
81	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-13	Section 1.3.1	DAMP Paragraph: This paragraph should just address the DAMP and not the Watershed Action Plans (WAP) since the only WAPs that were developed are for Aliso Creek and Newport Bay.	Reference to Watershed Action Plans has been removed.	Yes
82	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-18	Section 1.3.1.2	First Paragraph, last sentence: Move entire sentence to Section 1.3.2.	Sentence has been moved as suggested.	Yes
83	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-21	Section 1.3.5	Last Paragraph on page: Suggest moving to Section 1.3.2	This paragraph appropriately explains how stakeholders will be engaged. Section 1.3.2 does include a reference that the RWMG will engage stakeholders in the IRWM process.	No

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84	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-22	Section 1.3.7.1	First Sentence: Section 2.5 is referenced in error; change to correct section.	Correction to section reference has been made.	Yes
85	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-23	Section 1.3.7.1	First Paragraph below Table 1-1: Reference correct section. All OC cities are part of the OCSP not just the ones listed in this paragraph. The intent of this paragraph is confusing and may need to separate to address the water management responsibilities and the OCSP.  Last Paragraph: Revise to read, "Reduce the discharge of pollutants from MS4s to the Maximum Extent Practicable (MEP), including Best Management Practices (BMPs) management practices, control techniques and system, design and engineering methods, and such other provisions as Administrator or the State determines appropriate for the control of such pollutants." Also, explain who the Administrator is.	First Paragraph Below Table 1-1: The first sentence that references a section has been deleted to eliminate confusion of the paragraph.  Last Paragraph: Revised the sentence as suggested, with eliminating reference to "Administrator or State".	Yes
86	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-26	Section 1.3.8	Framework for Decision Making: This section is almost word for word in Sections 1.3.2, 1.3.3 and 1.3.5.	The IRWM Standards requires a reference to the region's framework for decision making. Keeping this paragraph as Section 1.3.8 is a direct and complete explanation of decision making. Minor edits have been made to the language.	No
87	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-29	Section 1.3.10	First Paragraph: HB's population is 195,212 less than the stated 200,000.	Reference to population has been changed to reflect Huntington Beach at "just over 195,000".	Yes
88	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	1-33	Section 1.5	Salt and Nutrient Planning Coordination paragraph: Missing Section 2.8.	Corrected reference to Section 2.2.	Yes
89	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-3	Figure 2-2	Be consistent when referring to the Anaheim Bay-Huntington Harbour Watershed. This figure only states, "Anaheim Bay Watershed".	Figure 2-2 has been updated as suggested.	Yes
90	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-4	Section 2.1.1	Incorrect Section reference.	Text where the section reference was has been deleted.	Yes
91	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-5	Section 2.1.1	Appropriate IRWM Region section: The appropriateness is already discussed in section 1.3.9.  Last Paragraph: What is NCCP and HCP?	It is important to emphasize appropriateness of the Region in this section to explain the Region watersheds, adjoining reions, and overlapping efforts. Appropriateness is repeated for ease of reference.  NCCP/HCP is "natural community conservation plan/habitat conservation plan", which is written out on page 1-17 and listed in the Acronyms section in the beginning of the Plan.	No

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92	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-6	Section 2.1.2	Footnote 1: References the wrong table.  First Paragraph, last sentence: "The Talbert and Alamitos seawater intrusion barriers were constructed to address this problem." Was this built as part of a previous IRWM? This sentence seems to be out of place.	Footnote 1: The correct table has been referenced in the footnote.  The seawater intrusions barriers were not built as part of a previous IRWM plan or project. Additional text has been added to identify the barriers being built in the 1960s.	Yes
93	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-8	Figure 2-5 and Section 2.1.2.2	North OC Watersheds figure: Should the "Santa Ana Watershed" be labeled "Santa Ana River Watershed" to be consistent throughout the document?  Lower San Gabriel River/Coyote Creek Watershed: Coyote Creek Watershed, as noted here, should be shown in Figure 2-2.	Figure 2-5: Figure 2-5 has been changed to correctly label "Santa Ana River Watershed", as well as all other figures with the Santa Ana River Watershed included.  Figure 2-2: Has been corrected to show the Lower San Gabriel River/Coyote Creek Watershed.	Yes
94	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-9	Section 2.1.2.3	Santa Ana River Watershed: Is there a difference between the Santa Ana River Watershed and the Santa Ana Watershed? If not, be consistent when referring to this watershed within the text and the figures.	Correction to "Santa Ana River Watershed" made and global change was made throughout Plan.	Yes
95	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-10	Section 2.1.2.3	Second Paragraph: Text, "...passing through the Talbert Watershed." Is there a reason to mention the Talbert Watershed when it isn't mentioned anywhere else or shown in any of the figures?	The reference to the Talbert Watershed has appropriately been removed.	Yes
96	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-17	Section 2.1.4	Watershed Management Plans: Text, "...Watershed Management Plans were developed for each of the three WMAs." The WMAs have not been completed.	Yes, the WMAs have been completed for each of the three WMAs. See response to Comment 8.	No
97	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-18	Section 2.1.4	Water Quality Studies: Should the 2 sub-paragraphs be bulleted? Or are these two paragraphs the WQ studies mentioned in the above paragraph and the bullets following these paragraphs refer to something else?	The subparagraphs have been bulleted.	Yes
98	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-19	Section 2.1.4	Orange County Reliability Study: Section 1.4.1 is referenced: there is not Section 1.4.1. Stormwater Resources Plan: Include year that it was developed. Watershed Infiltration Hydromodification Management Plan: There are 4 WIHMPs, but I don't think any have been approved by the SARWQCB.	<i>Orange County Reliability Study:</i> The section reference has been corrected to Section 1.3.1  <i>Stormwater Resources Plan:</i> The month/year (March 2017) the plan was developed has been included.  <i>WIHMPs:</i> The text should refer to the planning tool component of the WIHMPs and not the plans themselves. The mapping tools were used to develop the plans, and have been used in developing other plans as well – the WQIP and the SWRP. Therefore, a text edit has been made to clarify.	Yes
99	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-20	Section 2.1.5	First Paragraph: "Coastal managers are challenged with protecting coastal ecosystems..." Is this the California Coastal Commission? Second Paragraph: Huntington Beach has a population of 195,212; correct population number.	Text has been revised to be more general rather than assign responsibility to anyone or group in particular.  Population number has been corrected.	Yes
100	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-21	Section 2.1.6	Footnote 18: Refers to an incorrect table.	The correct table would have been Table 2-11, which is now Appendix D.	Yes

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101	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-26	Table 2-2	Total Inflow: Should total be 367,000? Total Outflow: +47,000 if total inflow is 367,000.	Table 2-2 figures have been corrected.	Yes
102	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-35	Table 2-3	2015-2040 Water Use Efficiency with New Conservation Efforts: How was this number calculated?	Table 2-3 references the source of information for the Water Use Efficiency with New Conservation Efforts in the Table's footnote 1; it states the amount is an "Estimate by MWDOC based on SBx 7-7 compliance by 2020 and projection to 2030. Source: OC Reliability Study Tables 4 and 7."	No
103	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-38	Section 2.1.7.5	Fourth Paragraph: Text, "Developing local supplies, including ocean desalination, is part of Metropolitan's Integrated Water Resource Plan (IRP) goal of improving water supply reliability in the Region..." Is the Region referred to here the same region as the OC Plan? If not, clarify what is meant.	Refers to the entire Southern California region within Metropolitan's service area, including the OC Region. Clarifying language has been made.	Yes
104	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-40	Section 2.1.7.6	Third Paragraph: If the SWRCB adopts Chapter 3.5 – Conservation and Prevention of Waste and Unreasonable Use policy, will it be addressed in the OC Plan?	Future updates to The OC Plan may consider and include future policies as appropriate. Policies are addressed within the projections in the OC Reliability Study, a planning document for OC water supply reliability, and will be updated as needed as new water supply policies, issues, etc. are approved. MWDOC and other water suppliers will continue to comply with regulators. The OC Plan engages stakeholders and encourages participation in the OC Reliability Study. The OC Plan references and utilizes a variety of studies.	No
105	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-41	Table 2-6	Water Demand Projections by Basin Region: Correct totals for 2025 and 2035. Also, is there a reason why the OC Basin amount for 2035 went down?	Text in the OC Reliability Study (p. 2-2), the source of the data for Table 2-6, states, "Based on the statistical model developed for the OC Study, a significant downturn in local economy could reduce average demands by about 13 percent, while hot/dry weather could increase average demands by about 9 percent. For more details on the demand forecasts see Appendix B and Appendix G". Appendix B is a Technical Memorandum on Water Demand Forecast and Supply Gap Analysis, see Section 1.3; and Appendix G includes Water Demand Forecasts for Orange County.	No
106	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-42, 2-43, and 2-47	Sections 2.1.7, 2.1.8, and 2.2	Paragraph that begins with "Surface water capture and treatment..." is on both pages 2-42 and 2-43, and again on page 2-47	The first reference to surface water capture and treatment is related to water demands, the second is in reference to water-related objectives and conflicts, and the third is in reference to local surface water quality. Some revisions have been made to be more specific and the third reference has been deleted.	Yes
107	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-44	Section 2.1.8	Habitat: Text, "Habitat areas in the Region include the following: : Bolsa Chica wetlands, Wetlands, Seal Beach National Wildlife Refuge, Coyote Creek, Carbon Creek, Brea Creek, Fullerton Creek, Huntington Beach State Park, Newport Bay, and wetlands,..." What other wetlands?	Revised text to be more general rather than trying to provide an exclusive list.	Yes
108	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-45	Section 2.1.8	First Paragraph - Climate Change: Text, "Climate change will influence water resources, and water supply availability for human and habitat need particularly. " What is meant by this sentence?	Text has been revised for clarity.	Yes
109	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-46	Figure 2-15	Regional Water Quality Control Boards figure: Include San Diego County label in figure.	Figure labeling has been refined to reflect regional board areas appropriately.	Yes
110	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-53	Section 2.2	Last Paragraph on page: This has been stated previously.	Text has been edited to remove redundancy.	Yes



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111	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-57	Figure 2-16	Impaired Water Bodies figure: Change Anaheim Bay Watershed to Anaheim Bay/Huntington Harbour Watershed and Santa Ana Watershed to Santa Ana River Watershed.	Figure has been updated.	Yes
112	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-57	Section 2.2	Trash Management: Text, "The Newport Bay Watershed Draft Trash Management Plan Framework was prepared as a planning level document to serve as a model for implementation throughout Orange County." So this states that the plan is for implementation throughout OC but in the next sentence it is to only help those in the Newport Bay Watershed – please clarify.	Language has been updated to clarify.	Yes
113	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-58	Section 2.2	Fourth Paragraph: Eliminate first sentence. This is the date the Section 13383 letters were issued to the Phase I permittees in North OC, it did not require the implementation of the provisions.	First sentence has been eliminated in the paragraph referenced.	Yes
114	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-70	Table 2-11 (now Appendix D)	County of Orange: Eliminate first sentence; also suggest to eliminate "several" in second sentence - doesn't the County have jurisdiction over all of the County beaches/parks/facilities?	Revised language and eliminated "several" in second sentence for clarification.	Yes
115	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-72	Table 2-11 (now Appendix D)	City of Huntington Beach: Correct population number to 195, 212 and poverty percentage.	Population and percentage in poverty have been corrected.	Yes
116	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-83	Section 2.5	First Paragraph: Is this paragraph meant to be county maintained or just a listing of larger sized open space/parks? Not sure the purpose of this paragraph compared to the previous paragraph. Will the other mentioned areas also have a summary below?	Clarifying edits have been made.	Yes
117	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-92	Section 2.6.2	Soils: Why are soils addressed only for the Newport Bay Watershed and not the other watersheds?	Additional information has been added for the Anaheim-Bay Huntington Harbor and Lower San Gabriel River/Coyote Cree.	Yes
118	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-95	Section 2.6.4	First Paragraph: Text, "The mountainous zone, coastal foothills, and the central flats of the Newport Bay and Newport Coast Watersheds provide..." What about the other watersheds?	Language has been revised to reference the Region.	Yes
119	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	2-107	n/a	Recommend adding Section 2.9 Climate Change Impacts on the Region, and also Section 2.8 is referenced on page 1-31, but there is no Section 2.8	Section 2.9 Climate Change Impacts on Region is included. Page 1-31, Section 1.5, Section 2.4 is now correctly referenced.	Yes
120	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-1	Section 3.1	Regional Vision, Mission, and Goals - Last Paragraph: Delete the last two sentences.	After careful review, it is felt that these two sentences add value and show purpose of the Goals and Objectives to produce effective projects in the region. The third sentence was revised and the fourth sentence remained.	Combined Yes and No

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121	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-3	Section 3.2 and Table 3-1	Statewide Priorities: Are the Statewide Priorities and the Resource Management Strategies the same? It is a little confusing later on (page 3-6) when the RMS is referred to but the strategies are not mentioned. Table 3-1: Table 3-1 should reflect ALL "Descriptions" from the Statewide priorities since Table 3-2 then refines what is applicable to the Region.	No, the Resource Management Strategies are strategies to implement the Statewide Priorities. To help understand, the last sentence in the first paragraph on page 3-7 has been edited as follows, "An RMS, as defined in the CWP Update 2013, is a technique, program, or policy that helps local agencies and governments manage their water and related resources, <u>in support of the Statewide Priorities.</u> "  Table 3-1: Agree, table has been updated except where all bullet items pertain to state actions. In this case, the statement, "This action is directed towards State and federal agencies..." remained.	Yes
122	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-6	Section 3.2	First paragraph after Table 3-2: This paragraph is restated in Section 4.1 – word for word except for the year. Same Paragraph: References "California Water Plan Update 2016". On page 4-1, it states that the RMS is identified in the CWP Update 2013.	Regarding the first paragraph after Table 3-2, it is helpful to state the importance of RMS to the Goals and Objectives when introduced in Section 3.2. It is equally important to restate this importance in Section 4 where RMS is discussed in detail. The first sentence in Section 4.1 has been edited slightly.  California Water Plan Update 2013 is correct. The next update is 2018; there is no update in 2016. Corrected to 2013 in this paragraph.	Yes
123	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-7	Section 3.2	Second Paragraph: References California Water Plan Update 2016 again.  Text, "The 30 strategies are organized under eight categories , plus the category of Other Strategies,..." What are the eight categories?  References Table 3-3 Statewide Resource Management Strategies: Table 3-3 and Table 4-2 should have the same checked boxes.  List of Objectives: Why are the objectives listed here if they're discussed in Section 3.5?	California Water Plan Update: See response to Comment 122.  The statement, "The 30 strategies are organized under eight categories, plus the category of Other Strategies..." is incorrect. The eight categories include Other Strategies; the language has been corrected. The eight categories are listed in Table 3-3 and are considered management objectives and include: Reduce Water Demand, Improve Flood Management, Improve Operational Efficiency and Transfers, Increase Water Supply, Improve Water Quality, Practice Resource Stewardship, People and Water, and Other Strategies.  Tables 3-3 and 4-2 have been updated for consistency; Sections 3.7 and 4.1 each refer to Tables 3-3 and 4-2 to demonstrate consistency across the two sections and relationship to regional water management strategies.  The OC Plan objectives are listed here to introduce them and to keep them in mind when reviewing Table 3-3. Details, as noted in the text, of the objectives are later discussed in 3.5	Yes
124	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-10	Section 3.3.1	Water Management Issues in Objective Areas - Water Supplies: Suggest adding a bullet, "Demand for potable water to fight fires may exceed the local water supply." See article: <a href="http://www.dailynews.com/2017/12/17/how-firefighters-get-their-water-and-why-its-sometimes-tricky-to-get-enough/">http://www.dailynews.com/2017/12/17/how-firefighters-get-their-water-and-why-its-sometimes-tricky-to-get-enough/</a> I understand that another agency has brought up water supply/reliability while fighting fires, with drier winters due to Climate Change, this should be a consideration for the IRWM. This should also be addressed in the Climate Change section below.	See response to Comment 1.	Yes
125	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-10	Section 3.3.2	Water Management Issues in Objective Areas - Water Quality - Bullet C: Why only Newport Bay? The Trash Provisions will have to be complied with once we receive our new permit. Bullet D: Split into two bullets as shown. Bullet F: There are many contaminants that are a concern not just new contaminants.	Section 3.3.2, Bullet C: Text has been revised to be inclusive to impacts to all waterways. Section 3.3.2, Bullet D: Text has been revised to split into two bullets. Section 3.3.2, Bullet F (previously Bullet E): This bullet intended to focus on emerging contaminants.	Yes
126	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-11 and 3-12	Section 3.3.3	Water Management Issues in Objective Areas - Ecosystems and Native Habitat - Bullet C: Specify the areas since in 3.3.3.b above you named Upper Newport Bay. First Paragraph on page 3-12: Eliminate last sentence. Over irrigation happens everywhere not just Newport Bay.	Bullet C is generalized across the region and additional information has been added to Bullet B.  Bullet F: Last sentence has been deleted.	Yes

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127	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-12	Section 3.3.4	Water Management Issues in Objective Areas - Flood Management - Bullet A: The same comment is accurate for local agencies flood facilities. Bullet D: Combine with 3.3.4.a. above [Bullet A].	Section 3.3.4, Bullet A: Added a reference to local facilities. Section 3.3.4, Bullet D has been combined with Bullet A.	Yes
128	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-14	Section 3.3.6	Water Management Issues in Objective Areas - Climate Change: Add a bullet b. to say, "Climate change has affected the length of the fire season, extending it longer into the year. Governor Brown has also mentioned that Climate change has affected the fire season." (See prior comment on fire impact).	A bullet has been added as suggested without reference to the Governor's statement since it's simply a comment. See response to Comment 1.	Yes
129	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-19	Section 3.5	Objectives and Strategies - First Paragraph, Third Sentence: Revise/shorten to: A unit of measure is associated with each strategy to help meet the objective	Section 3.5 text has been revised with slight adjustments as suggested.	Yes
130	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-23	Section 3.7	Benefits of Integration to Met Objectives: Text, "The value of integrated regional planning is a direct result of the extent to which water management strategies are determined to be complementary within a given region and then further identified to achieve multiple regional objectives." - Huh?!?	The text was carried forward from the existing Central OC IRWM Plan, page 4-7. The text has been revised to, "The value of integrated regional planning can be seen when water management strategies are found to be complementary within a given region and also achieve multiple regional objectives."	Yes
131	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-24	Section 3.7	Benefits of Integration to Met Objective - First Paragraph: Eliminate second and third sentences; replace with "Projects within the IRWM must address multiple strategies for multiple goals which in turn may be given higher priority in the IRWM Plan." So the Statewide Priorities and Resource Management Strategies are one and the same? See prior comment.  Second Paragraph: Eliminate all but last sentence. Already stated under benefits of integration (see bullets above).  Third Paragraph: Reword so it isn't repeating what's already been said in this section.  Fourth Paragraph: Eliminate all.  Last Paragraph: The second and third sentences could be used for each of the objectives. Keep this paragraph, "Water Supply Objectives" simple and to the point.	The first paragraph text appears to be clear and remains without changes. Regarding the questions if Statewide Priorities and Resource Management Strategies are one and the same, see response to Comment 121.  Second Paragraph: The detailed information in this paragraph meets the requirement to address regional integration and collaboration; therefore, text remained.  Third Paragraph: The information included in this paragraph is emphasizing different points than in other arts of this section; therefore, text remained.  Fourth Paragraph: This sentence is an introduction to what follows; it's been revised.  Last Paragraph, Water Supply Objectives: The second and third sentences have been moved to the fourth paragraph noted above as an introduction to the objectives that follow.	Combined Yes and No
132	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-27	Section 3.8	Potential Climate Change Impacts Considered in Objectives, second paragraph, first two sentences: Move to Hydrologic Pattern section [on next page].	Moved sentences to Hydrologic Pattern section as suggested.	Yes
133	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-30	Section 3.8	Potential Climate Change Impacts Considered in Objectives: Add a bullet titled "Fires" and provide text.	Fires are an impact on water demand. Therefore, additional information is added under the Water Demand bullet in this section. Also, see response to Comment 1.	Yes

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134	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	3-31	Section 3.8	Aquatic Life and Forest Health - First Paragraph: Text, "Because of warmer temperatures in streams, water quality standards related to aquatic life may require greater reservoir outflows, and thus diminish the availability of stored water for other uses." Are you saying that water will be released from reservoirs to allow aquatic life in streams to survive and that "other" uses, i.e., drinking water, will be less because of this !?!	No, the statement is not saying "water will be released". The key words are "may require...". This demonstrates one possible solution to the impact on aquatic life due to climate change and the importance of considering consequential or multiple impacts that could occur when one action is taken.	No
135	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-1	Section 4	First Paragraph: Eliminate and replace with "The OC Plan was developed with information that was currently available at the time and is meant to be adaptable when new data is available and changed conditions occurs."	Change in text as suggested has been made.	Yes
136	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4.1	Section 4.1	Process to Consider Resource Management Strategies - First Paragraph: This paragraph has been restated almost word for word as on page 3-6. Why does this need to be restated again – decide to have it in one section or if it needs to be in both, reword it! First Sentence Text, "...were considered and evaluated by an Ad Hoc Committee for applicability to the watershed management areas within the Region." Is this a different ad hoc committee than the North Central OC IRWM ad hoc committee?	See response to Comment 122.  The Ad Hoc Committee referenced in this paragraph is the same Ad Hoc Committee formed to develop IRWM Plan Goals, Objectives, and Strategies. Specific referenve to the Ad Hoc Committee has been omitted to eliminate confusion.	Yes
137	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-8	Section 4.2	Desalination - Brackish & Seawater RMS, Third Paragraph: What is IRP? Fourth Paragraph: The reference to Section 2.1.4 is not correct.	IRP stands for Integrated Water Resources Plan and is included in the list of acronyms in the IRWM Plan. The reference to Section 2.1.4 has been corrected to Section 2.2.5 (previously 2.1.7.5).	Yes
138	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-13	Section 4.2	Urban Stormwater Runoff Management RMS - First Paragraph, Second Sentence: Text, "Concerns about the water quality impacts of urban runoff have led water agencies in the Region to look at watershed approaches to control runoff and provide other benefits." Are you sure that it was "Water agencies"?  Fourth Sentence Text, "Best management practices have been developed to pollutant loads, volume and flows into waterways." This sentence doesn't make sense.  Last Sentence Text: "The EPA established the NPDES system to regulate urban and storm water runoff to protect water quality." Clean Water Act?	1. Revised text to also reference cities.  2. Revised text to clarify "...manage pollutant loads..."  3. Added sentence to reference the Clean Water Act.	Yes
139	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-20	Section 4.3	Resource Management Strategies Not Applicable to the Region, First Paragraph: Eliminate the first sentence and expand on why the RMS does not apply to the Region, i.e., Delta, State, Federal, etc.	First sentence modified and additional text added to explain why the RMS included in this section do not apply to the Region.	Yes
140	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-21	Section 4.4	Regional Strategies: Should this be combined into Section 3.5?  The way that this section is referred to is inconsistent with the rest of the document – be consistent throughout the document. If a section is referenced, then don't repeat the information.	See responses to Comment 122.	Yes

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141	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-22	Section 4.4	First Paragraph: Delete paragraph as being redundant.  Second Paragraph, First Sentence: Eliminate. This is the same sentence that is in Section 4.4, paragraph 2. Second Sentence: Eliminate. There are other watersheds within this IRWM and not just the Santa Ana River Watershed.	First Paragraph: See response to Comment 123. Text has been revised to reduce redundancy.  Second Paragraph: Revisions made to remove reference to Santa Ana River Watershed.	Yes
142	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-28	Section 4.4.6	Second and Third Paragraphs: Text references Section 2.9. There is no Section 2.9	Chapter 2 has been renumbered and now Section 2.9 is correctly referenced.	Yes
143	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-29	Section 4.5.1	Regional and Inter-regional Benefits, Second Paragraph, Second Sentence: Previously stated.	Text eliminated as suggested.	Yes
144	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-30	Section 4.5.1	Third Paragraph, last sentence: Previously stated.	Text eliminated as suggested.	Yes
145	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-30	Section 4.5.2	DAC/Environmental Justice Benefits, First Paragraph: References Section 2.1.3 as discussing DACs, but that section does not discuss DACs. References Figure 2.3 as the DAC figure, but is incorrect. Eliminate second half of second sentence, redundant. Second Paragraph: Previously stated in Section 3.7 – Quality of Life Objectives.	Text has been rewritten; a section reference is no longer included. Figure corrected to reference Figure 2-10. Second Paragraph: Revised text based on suggestion.	Yes
146	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	4-31	Section 4.5.2	Coastal Benefits, First Paragraph: Previously stated in Section 2.1.5.	Deleted paragraph and revised text.	Yes
147	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	5-5	Table 5-1	Change Calibration Weight to Impact Weight.	Change to Impact Weight has been made.	Yes
148	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	6-5	Section 6.3.1	Data Collection and Needs Within the Region, Water Quality Data Needs, Second Paragraph: Refers to Section 2.1.1, which is incorrect.	Section corrected to reference Section 2.1.4	Yes
149	Terri Elliott, Principal Civil Engineer, Public Works, City of Huntington Beach	12/20/2017 - Online	6-19	Section 6.4.2	Last Paragraph: References Section 2.10, which does not exist.	Section corrected to reference Section 2.9	Yes
150	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	1-3	Section 1.1	First Paragraph, Last sentence: Rewrite sentence. Fourth Paragraph: Eliminate last sentence; repetitive.	First Paragraph: Last sentence has been rewritten for clarification.  Fourth Paragraph: Last sentence has been eliminated as suggested.	Yes

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151	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	1-4	Section 1.1	Watershed Management in the Region, Second Paragraph: Rewrite, not grammatically correct.	Paragraph has been rewritten as suggested to be grammatically correct,	Yes
152	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	1-5	Section 1.1	First Bullet on Page: Text, "• Allows for subarea management of priorities." What does this mean? Fifth Bullet: Text, "• Allows for coordination between local and regional water and sewer infrastructure with flood control and storm drain systems." Coordination between agencies?	First Bullet on Page: Text has been rewritten to "Allows priority setting at a local level" Fifth Bullet on page: Text rewritten for clarification.	Yes
153	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	1-11	Section 1.3.1	Total Maximum Daily Loads paragraph: May want to describe what a technical TMDL is.	A footnote has been added defining TMDLs and a second footnote has been added defining Technical TMDLs.	Yes
154	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	1-19	Section 1.3.3	First Paragraph, Third Sentence: Should OC Public Works/OC Watersheds now be OC Environmental Resources?	The reference has been corrected to OC Public Works/OC Environmental Resources.	Yes
155	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	2-4	Section 2.1.1	Incorrect Section reference.	See response to Comment 90.	Yes
156	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	2-8	Figure 2-5	Santa Ana Watershed in figure should be Santa Ana River Watershed.	See response to Comment 93.	Yes
157	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	2-14	Section 2.1.3.1	Newport Bay Watershed, Second Paragraph: Discuss agricultural uses, source of legacy pesticides which are decreasing through time.	Language has been added to describe legacy agricultural use in the region.	Yes
158	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	2-20	Section 2.1.7	Water Supplies: This is a good section and provides a great summary of water in the region. Suggest it be its own sub-section like 2.2 Water Supplies. Currently 2.2, Water Quality, is its own sub-section.	Section 2 has been renumbered as suggested.	Yes
159	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	2-66	Table 2-11 (now Appendix D)	A form of this table is already presented in Table 1-1, Roles and Responsibilities; Is there a way to combine this Section 2.3, Jurisdictional Boundaries so it is not repeated in two places?	Table 2-11 has been moved to Appendix D and represents agencies that have jurisdiction within the Region. Sections of the plan also reference many of the same jurisdictional agencies and organizations where appropriate.	Yes
160	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	2-95	Section 2.7	Climate Change Impacts in the Region, Second Paragraph: This section repeats almost verbatim in Section 6, P.6-19	This section is Climate Change Impacts in the Region, and Section 6 is Consideration of Effects of Climate Change to the Region. Information included in the noted paragraph is important to include and emphasize in both sections.	No
161	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-3	Table 3-1	Statewide Priorities, 3. Achieve the Co-Equal goals for the Delta: See comments in Section 4.3 under Conveyance – Delta & Surface Storage CALFED RMS. Does consideration stated here conflict with what is stated as non- applicability in Section 4.3?	No, as noted in Table 3-1, this action is directed towards State and federal agencies, and in Section 4-3, the RMS is not directly applicable to the region. Table 3-1 does, however, provides consideration for local or regional projects that also support achieving the co-equal goals of the Delta, although understood that projects would <u>support</u> rather than be directly applicable.	No
162	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-8	Table 3-3	Tables breaking across pages should say "Continued."	Tables throughout the Plan have been reformatted to eliminate any breaking of tables when possible and formatting tables to make them easy to read.	Yes

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163	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-10	Section 3.3	Water Management Issues in Objective Areas: This title with addition of "Areas" is confusing; update TOC if you change it. This section appears to have been written by numerous authors. The tone, grammar, and writing style is not consistent with other sections.	For this title, "Areas" means topics or focus areas, not specific objectives. Since the Plan refers to the Region and areas within the region, this may be confusing; therefore, "Objective Areas" has been removed.  This section and other sections have been edited to make the tone, grammar and writing more consistent.	Yes
164	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-10	Section 3.3.1	Water Supplies: Section 3, in particular, Subsections 3.3.1 to 3.3.6 read very differently than other Sections of this Plan; numerous authors? Reads choppy in some sections and the tone is [comment wasn't completed]	See response to Comment 163.	Yes
165	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-10	Section 3.3.2	Water Quality, Bullet C: Choppy sections; Why is Newport Bay specifically called out? Other waterbodies in other watersheds? Bullet E: Text, "Emerging contaminants, such as pyrethroid pesticides and polybrominated diphenyl ethers (PBDEs), pharmaceuticals, and personal care products, are a concern." Why [is this a concern]?	Bullet C: See response to Comment 125. Bullet E: The U.S. EPA considers these as contaminants of emerging concern; chemicals that have been detected in drinking water supplies at trace levels and for which the risk to human health is not yet known. Generally, contaminants of emerging concern include pharmaceuticals, personal care products, pesticides, herbicides and endocrine disrupting compounds. Therefore, language has been added to refer to the public health risk.	Yes
166	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-11	Section 3.3.3	Ecosystems and Native Habitat, Bullet B: Why is Newport Bay only mentioned, what about the other watersheds? Was author/stakeholder more concerned about just Newport Bay? Bullet D: Re-write [first sentence]; this reads that urbanization results in stormwater. Bullet F: Newport Bay Watershed is listed; are there other watersheds?	Bullet B: See response to Comment 126. Bullet D: Text refined as recommended. Bullet F: Text revised to "Region" instead of naming any specific watershed.	yes
167	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-12	Section 3.3.4	Flood Management, Bullet B: Text, "Long delays for regulatory permits for maintenance or repair of flood control facilities exist." Specify the agencies causing the delays. ACOE	The sentence has been deleted rather than to highlight who is causing the delays.	Yes
168	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-13	Section 3.3.5	Quality of Life in Orange County, Bullet C: Other groups use the waters. Why highlight just DAC here? Bullet E, last sentence: How is this linkage of access to parks and recreation with economic vitality and greens jobs creation made?	Bullet C: Discussion of DACs in relation to quality of life is emphasized in the DWR IRWM Standards; text has been updated to include "as well as other communities". Bullet E: Additional text has been added to explain the linkage between parks, green jobs and economic vitality.	Yes
169	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-15	Section 3.4	Regional Goals: Can Section 3.4 and 3.5 be moved forward to combine with Section 3.1 and 3.2? After goals and objectives are introduced in Section 3.1 and 3.2, the Goals are discussed again in Section 3.4. Section 3.5 then reintroduces the Objectives which were already presented on page 3-7 and Table 3-3.	Language has been removed to reduce redundancy or repetitive nature of this section. See response to Comments 123 and 163.	Yes
170	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-25	Section 3.7	Benefits of Integration to Meet Objectives, Climate Change Objectives: Numbered points in paragraph should be bullets.	Change has been made as suggested.	Yes
171	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	3-29	Section 3.8	Potential Climate Change Impacts Considered in Objectives, Aquatic Life and Forest Health, last sentence: Balance human consumption needs over WQS for aquatic life.	Language has been added as suggested.	Yes

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172	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	4-20	Section 4.3	Resource Management Strategies Not Applicable to the Region, Conveyance – Delta and Surface Storage CALFED RMS: Does this section conflict with the Table 3-1, #3 – “This action is directed towards State and federal agencies; however, consideration will be afforded to eligible local or regional projects that also support achieving the co-equal goals providing a more reliable water supply for California and to protect, restore, and enhance the Delta ecosystem.”	See response to Comment 161.	No
173	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	4-21	Section 4.4	Regional Strategies, last paragraph: No need to repeat what was discussed in Section 3. [all but first sentence]	See response to Comment 141. Revisions have been made to reduce redundancy in text.	Yes
174	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online	5-7	Section 5.3.1	The OC Plan and State Agency Priorities, third paragraph: Text, "For many years, significant effort has been exerted to improve water quality conditions in the Region,..." Who has exerted this significant effort? Text, "The new draft NPDES stormwater permit for North Orange County requires the creation of Watershed Master Plans,..." Perhaps requires a bit of explanation clarifying the distinction of NOC permit versus the North OC Watershed.	Text has been revised to clarify.	Yes
175	Thomas Lo, Water Quality Administrator, City of Irvine	12/20/2017 - Online		Appendix G	Define Calibration Weight.	"Calibration Weight" has been changed to "Impact Weight" to align with the function of the weighting.	Yes