

Watershed Action Plan –Comments with responses

June '02 Core Group Survey Question #2: 8/8 responders agreed that “overall, the style strikes an appropriate balance” suitable for Core Group, boards & executive staff of signatories, potential funders, civic and community groups, and the public. <i>Specific comments on this question follow:</i>			
ID	By	Comment Text	Response/Possible Action
CG2AC	Ann Coombs	I would prefer the shorter document, but I think clear description of problems and strategies and what’s being done now and what could be done in the future are critical to our ability to convince others.	No response necessary.
CG2CG	Crisand Giles	Co-workers with limited watershed experience could understand draft concepts.	Comment noted. No response necessary.
CG2KM1	Kristy McCumby & Lorrie Gervin	There are parts that may be a little too informal and others where the language is too academic and stilted. However, it is not really clear who the audience is for this document, so it is difficult to tell if the style is at an appropriate level for those who will be reading it.	Comment noted. The target audience is described in the “General Features” document approved by the Core Group in February 2002.
CG2KM2	Kristy McCumby & Lorrie Gervin	We had the most difficulty with Chapter 2 and the way it was written. It uses too many adjectives and is too judgmental in the descriptions of the watershed areas. It is easy to make judgments on choices made in the past with information we have today, but we should avoid “second guessing” why choices were made the way it is written now will likely alienate important members of the audience. There are many opinions stated here. Statements attributed to others should have citations. This problem wasn’t as apparent in other chapters.	See responses to comments A-KM-1 through A-KM-11 (detailed comments on Chapter 2 from same commenter). Chap. 2 is an introduction and summary; relevant citations are attached to the more extended discussion in each of Chapters 3-9. There will be a bibliography. The commenter’s concern regarding the possible reaction of “important members of the audience” is noted. Reviewers of this document included a broad cross-section of the community (including representatives of advocacy groups, business, and other public agencies). Based on the whole of the comments received from all reviewers, these concerns appear to be specific to this commenter.
CG2TM	Trish Mulvey	I agree with the compendium of comments. My particular concern is clarity on the actual audience as this document evolves. In fact, I am not sure this is the document we expected or need for audiences beyond the WMI “inner circle”.	The target audience is described in the “General Features” document approved by the Core Group in February 2002. The March 2003 draft includes an executive summary.
June '02 Core Group Survey Question #3: 6/8 responders agreed that “It’s OK to make the document longer (say around 150 pages).” <i>Specific comments on this question follow:</i>			
ID	By	Comment Text	Response/Possible Action
CG3JN	Jennie Nussbaum	Rely on detailed comments and edits rather than page length set in stone	No response necessary.
CG3AC	Ann Coombs	Chapter 7, C2, C3, and C4 are too long. There may be other places to cut too.	The overall issue of length was considered in the rewrite. These specific sections were lightly edited, but it was decided that it would not be possible to significantly reduce their length without compromising the explanation of how the insights of conservation biology should be applied to preserving Santa Clara Basin habitats.
CG3CG	Crisand Giles	I would prefer 50-80 pages, but understand the level of detail we are looking for. I find no real difference after 100 pages-let’s give the CD format lots of linking to manage time spent reviewing document.	Comment noted. March 2003 draft includes an Executive Summary and (in the electronic version) hyperlinks.

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CG3KM	Kristy McCumby & Lorrie Gervin	We are torn between liking the level of detail presented, but feeling that it needs to be presented in a more concise manner. This document is a big departure from the “book of ideas” that was originally discussed for this volume and what has been done here is a very different approach. This report really becomes the WMI’s documentation. A good executive summary could be used as a marketing tool.	The level of detail is consistent with the target length identified at the January 2000 retreat (i.e. around 100 pages). An executive summary is included with the complete draft.
CG3TM	Trish Mulvey	I especially agree with comment “C” that this is a big departure from a book of ideas. I think we probably need to stop and stand back and see if this is what we want and need as an ACTION PLAN. I like the vision descriptions, and I think it is a nice story of where we are and how we got here, what we are doing, and some thoughts on where we as the WMI might go that may be worth continuing to refine for our own edification, possibly for work plan and budget, and as part of our institutional historical memory. However, it simply isn’t an action plan for the things our agencies, municipalities, organizations and community members can actually do on the ground to make a difference in accomplishing our mission. I guess I am really still looking for something like the Napa “owner’s manual”.	Subsequent to the receipt of comments, the WMI’s approach to influencing agency actions was further developed in COS and Core Group discussions. This approach has been included in the current (March 2003) draft.
June ’02 Core Group Survey Question #4: 5/8 responders agreed that Chapters 1-9 “cover the most important policies, programs and activities in about the right amount of detail” (Of the remaining three, two wanted less detail and one wanted more detail). Specific comments on this question follow:			
ID	By	Comment Text	Response/Possible Action
CG4SY	Sarah Young	Descriptions of current actions need to be linked to the WMI’s parallel tracking efforts.	Suggest that this document be used to update and revamp the WMI’s parallel tracking efforts.
CG4RM	Richard McMurtry	There is much too much detail in the current activities sections of some chapters as well as a glaring lack of detail in the future actions/next steps. The lack of detail in some next steps sections can in some cases be addressed by including the “tasks” listed in the Action Sheets.	This comment addressed in a June 21 response letter (attached).
CG4CG	Crisand Giles	I’m torn with wanting to show inconsistencies between policies	No response necessary.
CG4KM	Kristy McCumby & Lorrie Gervin	Linkages to other programs should be noted, but not such lengthy explanations of others’ work in the watersheds.	The task of identifying and describing existing policies, programs, and activities was identified as the major work in producing in the Action Plan (January 2002 retreat, February 2002 presentation to Core Group).
CG4TM	Trish Mulvey	I especially agree with comment “B” about the need to describe future actions, and concerns about unevenness.	The comment refers to Comment CG4RM, which was addressed in the June 21 response letter.
June ’02 Core Group Survey Question #5: Four responders were satisfied that “draft is consistent with the Action Worksheets”; four said “draft does not capture what was in the Action Worksheets.” Specific comments on this question follow:			
ID	By	Comment Text	Response/Possible Action
CG5AC	Ann Coombs	I haven’t had time to look at this thoroughly	No response necessary.
CG5SY	Sarah Young	The linkage to action worksheets needs to be strengthened significantly. Evaluation criteria in the Action Worksheets, and how these Action Worksheets could be used need to be discussed in the narratives.	The action worksheet process, including its strengths and weaknesses, is discussed in the revised Chapter 1. Measures of success (evaluation criteria) are discussed in the updated draft Chapter 10.
CG5RM	Richard	WAS 5A3a, FMS 4C2, FMS 4C5, FMS 5A1f, FMS 4E1, In some cases, the draft skillfully	These comments addressed in a June 21 response letter

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	McMurtry	captures an entire Action Worksheet in a phrase of several words. For example, WAS 5A3a is reduced to “eliminating stream/pond connections” on page 82. However, what is lost is valuable smaller scale “next steps” as identified in the Task list on the worksheet, e.g. in this case, “conduct waterbody survey...”. [comment continues]	(attached).
CG5CG	Crisand Giles	I think the worksheets were not consistent in the beginning-but I do think crossover content was managed well	No response necessary.
CG5KM	Kristy McCumby & Lorrie Gervin	It is a good beginning, but a lot of effort on the part of the workgroups went into the actions developed on these worksheets. It seems like some of the finer details (if developed by the work groups -and not all of them did) are missing. This is why it may be a good idea to include the actual worksheets in an appendix or in some other type of attachment to the document so that those ideas developed by the consensus process aren't lost. This should also provide some comfort/ trust to WMI members who developed these worksheets that the ideas included within them would be included in the WMI action plan.	As documented in responses to comments and in various discussions after release of draft Chapters 1-9 (in May 2002), the WAP attempts to incorporate and synthesize all the actions and tasks that are in the Action Worksheets. Development of the WAP included eliminating overlaps and covering gaps as well as updating the scientific, policy, and factual assumptions that were in the worksheets. If it is believed that publishing the original worksheets would still be useful, the idea should be proposed to the Core Group.
CG5TM	Trish Mulvey	As previously noted, while Chapter 10 “will focus on the WMI’s future and what the Core Group and Subgroups can do to make a difference”, what I think we need is an Action Plan for signatories and the community.	The WMI’s capabilities for influencing agency policies were discussed at meetings subsequent to May 2002; the content of those discussions is addressed in the March 2003 draft of Chapter 10.
June '02 Core Group Survey Question #6: 8/8 respondents agreed that in general, it is useful to highlight the “specific strategies for accomplishing the WMI’s vision” that were included in Chapters 3-9 and summarized in the table accompanying the June submittal. Specific comments on this question follow:			
ID	By	Comment Text	Response/Possible Action
CG6AC	Ann Coombs	It’s not clear to me how the NCCP would work. Needs more clarification.	Reviewed Feb. 2002 NCCP standards and guidance and incorporated additional detail into Chapter 7.
CG6SY	Sarah Young	It’s important to stay at a strategic level in the narratives and important to refer menu of actions level of details to the Action Worksheets. However, the narrative needs to be explicit about the linkage between the two levels of details.	The subsequent identification of “strategic policy objectives” and their incorporation into Chapters 3-9 responds to this comment.
CG6RM	Richard McMurtry	Yes, we need to highlight strategies, but we need also to identify smaller next steps as identified in the action sheets.	Next steps are more clearly identified in the revised Chapters 3-9.
CG6CG	Crisand Giles	I think broad menus result in inaction-people need focus on a few reachable goals	Yes, this was the purpose of separately identifying some specific WMI actions in addition to the generic activities identified in the worksheets.
CG6TM	Trish Mulvey	I think we can describe strategies and specific actions.	See response immediately above.
June '02 Core Group Survey Question #7: 8/8 respondents agreed that it was useful to organize the “Next Steps” by WMI function. Specific comments on this question follow:			
ID	By	Comment Text	Response/Possible Action
CG7SY	Sarah Young	WMI here would include both collective and individual efforts from each signatory.	No, in the draft, the collective and individual efforts were separated, and “Next Steps” were identified specifically for the WMI. It wasn’t possible to be more specific about “next steps” for WMI signatories because of the broad and generic nature of

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			the Action Worksheets.
CG7RM	Richard McMurtry	Though I think using the WMI functions could be a useful way to frame next steps, the actual implementation of this use in the WAP has left out tasks and subtasks of the actions.	It was intended to include all the information in the action worksheets in the Action Plan narrative. See June 21 response letter.
CG7CG	Crisand Giles	I like next steps if they can be specific; a sort of punch list of goals.	The next steps were refined in subsequent presentations to the Core Group and Regulatory Executive Forum. These next steps are included in the March 2003 complete draft.
CG7TM	Trish Mulvey	As noted, beyond WMI “next steps” we need actions for the signatories and broader community. If we continue to refine this document for the WMI, adding more detail as “anticipated” will be helpful.	Additional consensus on next steps was achieved in subsequent discussions and is reflected in the complete draft.
June '02 Core Group Survey Question #8: 7/8 respondents agreed that <i>Chicago Manual of Style</i> Documentation Style 1 is OK for the WAP.			
<i>Specific comments on this question follow:</i>			
ID	By	Comment Text	Response/Possible Action
CG8CG	Crisand Giles	My preference would be scientific. I find it less intrusive when reading and more specific for obtaining info. for you to review	Comment noted, each style has advantages and disadvantages; majority of responders thought documentation Style 1 is OK.
CG8KM	Kristy McCumby & Lorrie Gervin	It's our opinion that the bibliography is essential. Whether it's at the end of a chapter or at the end of the document, it doesn't matter. It just needs to be in there somewhere. Documentation style “one” is a little more reader friendly, and since this is not a strictly scientific paper, document style “two” is not essential.	Insure that the bibliography is as complete as possible.
CG8TM	Trish Mulvey	A complete bibliography or reference section is very important (NOT “optional”).	See response to comment above.
June '02 Core Group Survey Question #9: <i>Initial general comments on style, organization and approach in Chapters 1-9</i>			
ID	By	Comment Text	Response/Possible Action
CG9CG	Crisand Giles	Overall excellent work! As we went through the action worksheets process I was having trouble envisioning the deliverable	No response necessary.
CG9KM1	Kristy McCumby & Lorrie Gervin	We really haven't had enough time to review this fully, given the short time frame. However, as this document is written now, no council member will read the whole thing. Perhaps some staff member might, but not the person making decisions. We have some real concerns about the tone of this document and the social commentary issues.	Comment period for General Comments on draft Chapters 1-9 was from May 31 until July 8, 2002. The length and contents of the draft are as described in the “General Features” document approved by the Core Group in February 2002. The March 2003 draft includes an executive summary.
CG9KM2	Kristy McCumby & Lorrie Gervin	There are also some switches between third person and first person narrative forms that are a little disconcerting. We need decide on one style and then stick with it.	Reviewed narrative, identified and correct switches (e.g., in 8f5)
CG9AC1	Ann Coombs	Chpt 7: Add fast forward box, fish are discussed in Chapter 8	Added to Section 7a.
CG9AC2	Ann Coombs	Chpt.8 g2: typo, 4th par. “retaining imperviousness” should be “reducing imperviousness”	Corrected error.
CG9AC3	Ann Coombs	The “fast forward” and “rewind” boxes are a clever way to clarify cross connections in this complicated topic. In all I'd say you've done an amazing job of clarifying the issues and	No response necessary.

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		next steps while showing that a lot is already being done.	
CG9SY1	Sarah Young	Chpt. 1: Provide discussion on how the document would be used along with the action worksheets	If future use of the Action Worksheets is desired, this should be brought to the Core Group for a decision.
CG9SY2	Sarah Young	Briefly describe the Action Sheet development process using the flowchart	Discussion of process is incorporated into revised Chapter One.
CG9SY3	Sarah Young	Describe a process for improving the Action Worksheets for final incorporation in the report and for identifying gaps/overlaps	If future use of the Action Worksheets is desired, this should be brought to the Core Group for a decision.
CG9SY4	Sarah Young	Explain the scope and limitations if this Plan	Incorporated into revised Chapter One.
CG9SY5	Sarah Young	Explain where the prioritization discussion fits in the scheme of things	Subsequent (October 2002) Core Group discussion has been included in Chapter 10.
CG9SY6	Sarah Young	Chpt 2: Needs an illustration depicting this comprehensive approach	Used the WMI Vision graphic to illustrate the WAP.
CG9SY7	Sarah Young	Chpts. 3-9: Next Steps for the WMI (collectively and individual signatory) need to better link to the Action worksheets. Final version should reflect the results of improved Action Worksheets, and gaps/overlaps analysis	Discussion of the Action Worksheets has been added to Chapter One. Next steps have been refined and incorporated into Chapters 3-9.
CG9SY8	Sarah Young	Permit streamlining issues need to be covered in the document	Incorporated into next steps in Chapter Nine and an inset box in Chapter 10.
CG9SY9	Sarah Young	List of Figures needs to be evaluated collectively	Figures added to complete draft.
CG9TM	Trish Mulvey	I agree with the compendium of comments. See previous questions/comments on whether we have the "right" document(s) and the right audience(s) in mind. Please also note, I want to especially agree with the "Overall excellent work!" comment. Just because I have questions about whether this is what we need as an Action Plan, does not mean I don't really appreciate the effort that has given us this draft product and the insights that are provided. Thank you.	No response necessary.
CG9KM3	Kristy McCumby & Lorrie Gervin	We will try to submit more detailed comments on the narrative itself by the July 8 deadline. But, we are concerned about the short time frame for review and comment. We realize there is a delicate balance between getting the product out there and having it get bogged down in a number of revisions. However, this is a fairly important piece of information that will direct where the WMI goes in the future. So, it really needs to be reviewed in a critical and thoughtful manner, with enough different stakeholder participation so that we feel comfortable with the final product and it will be used.	Thirty-eight days were allowed for comments on the June draft.
June '02 Core Group Survey Question #10: More detailed comments on draft Chapters 1 – 9. Comments submitted with the Core Group surveys (due 6/14/2002)			
CG10LJ1	Larry Johann	Chpt. 1 - 1b. 1. - Reference to the Watershed Characteristics Report needs to cite the Rev. 1 version of the document as there is blatantly false information in the initial release regarding the genetic testing of Guadalupe Chinook salmon performed by Dr. J. Nielsen as well as omitted historic salmonid references and other serious errors.	Update reference.
CG10LJ2	Larry Johann	Chpt. 2 4 th Para. Last Sentence - Although salmon and steelhead swim up our rivers, none have be known to make it to the headwaters of our largest waterways. Structures	Deleted "in stream headwaters."

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		have prevented fish from migrating to the headwaters of the Guadalupe, Coyote and Stevens Creek Watersheds. In the Guadalupe River and Coyote Creek, Chinook salmon have been documented spawning from just above tidewater through the downtown area. On the Guadalupe they have been documented spawning up to Branham Lane. On Los Gatos Creek they have been documented spawning from the creek's confluence with the river up to Campbell Ave.	
CG10LJ3	Larry Johann	<i>Chpt. 8 8e2. 3rd Para.</i> - The description of the Guadalupe River Project is grossly inaccurate. There is nothing in equilibrium in this project, it is totally out of equilibrium. The primary reason the Contract 3 section of the Downtown Guadalupe River Flood Control Project was stopped was because the Contract 1 and 2 phases were failing so badly and violating CEQA, the CWA, project permits mandates and its mitigation commitments, as was the 1983 and 1995 Lower Guadalupe Flood Control Projects and its mitigation efforts. The Contract 3 segment was slated to do even greater damage to the river.	The sentence referring to "equilibrium" has been deleted.
CG10LJ4	Larry Johann	<i>Chpt. 8t 8e2. 5th & 6th Para.</i> - The viability of the redesigned Contract 3 section extremely questionable. At the entrance to the bypass culverts at I-280 the river has been over widened and this area will become a depositional zone and will likely fill with sediment. There is also a good chance the main channel will become clogged with debris. Where the bypasses feed back into the river, severe erosion will be caused as sediment hungry, high velocity flows will be dumped into an already eroding and unstable area. The Contract 1 and 2 areas continue to erode violating CEQA, the CWA, and project permits and adversely impacting water quality and most beneficial uses. One of the main problems in the Contract 1 and 2 areas is the deliberate effort to deprive the river of its floodplain. High berms and log crib walls have been constructed on the west bank, at great cost, in a futile attempt to keep the river from accessing its floodplain. The upland vegetation planted outside the riparian zone in a bypass corridor is being claimed as riparian mitigation but it is not doing well, as the clay layer it keeping roots from accessing needed water. The secondary irrigation ditch is serving to heat up water and elevate critical river temperatures.	The following paragraph has been added to the text: Despite the efforts of the Guadalupe River Flood Control Project Collaborative to develop a design that balances flood protection with habitat protection and enhancement, there are some who remain highly critical of the project while continuing to work towards improvement of the proper integration of habitat protection and flood control project implementation. These comments have been added, verbatim, as a footnote.
CG10LJ5	Larry Johann	<i>Chpt. 8 8e2. 7th Para.</i> The geomorphic functions were not returned to lower Guadalupe Creek. Very little channel modification was made to the creek, contrary to project consultant recommendations. Almost 8 million dollars was spent on about a 1.7 miles project, which installed structures where structures were not needed and did not install them where they were needed. Although numerous small sapling plants were installed they will take 10 to twenty years to grow enough to shade the creek, if they survive at all. The worst part is fish can't normally access the creek as the project does not go all of the way down to the river confluence. The 1.2 million dollar drop structure only leads salmonids to an inhospitable environment, Lake Almaden, a warm lake filled with predators. Dave Rosgen indicated he could restore the creek's proper form and fluvial geomorphic function from Camden Ave. to the river confluence, about 2.5 miles, including removal of the Masson Dam for well under 1 million dollars. Dave Derrick, ACOE, stated that 8 million dollars for the Guadalupe Creek project was absurd and the project was not	These comments are included in the footnote to the text.

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		achieving its goal. The Masson Dam replacement project was another 1.3 million dollar project that will cause more problems than it will solve.	
CG10LJ6	Larry Johmann	<i>Chpt. 8</i> Rewind Page 67 - The SCVWD lost their permits to construct instream spreader dams in 1995 and they have not been installed in Guadalupe Creek or any of our main waterway's since, to the great benefit of the waterways and their aquatic & riparian habitat.	Edit box to correct date when construction of instream gravel spreader dams was halted.
CG10LJ7	Larry Johmann	<i>Chpt. 8t</i> 8e3 - In November 2000 the voters approved Measure B “Clean Safe Creeks and Natural Flood Protection.” The construction or reconstruction of “Flood Control Facilities” is not , by any stretch of the imagination, Natural Flood Protection”!!! It is diametrically opposite. Construction of “flood control facilities” degrades or destroys most beneficial uses and aquatic and riparian habitat, degrades water quality and causes hazardous conditions in our waterways. Voters did not approve taxes to degrade our waterways or our beneficial uses and using money approved by voters to protect and restore waterways for projects that will degrade them is fraudulent. If the natural methods of providing flood protection were used as promised, there would be little need for mitigation projects.	Comment does not address whether the content of 8e3 is accurate. No edits appear to necessary.
CG10LJ8	Larry Johmann	<i>Chpt. 8</i> 8e4 - The application of glyphosate is hazardous to animal and aquatic life. How can the application of this toxic substance be permitted in our waterways? Products containing this substance for residential use warn that it is toxic to pets and fish. Domestic animals do not often feed off the weeds it is sprayed on around the home but birds, ducks and aquatic species often feed off of aquatic vegetation, so they are far more susceptible to being poisoned by this chemical. The use of hardscape, such as rock rip rap, concrete sacks, rubble, gabions or log crib walls causes channel and bank erosion in most cases and thus degrades water quality. This is not in concert with the promised “Clean Safe Creeks and Natural Flood Protection” initiative.	This comment responds to the information presented but does not suggest that it is inaccurate. No edits necessary.
CG10LJ9	Larry Johmann	<i>Chpt. 8</i> 8f2 - When the WMI selected the three pilot watersheds for evaluation there was no stipulation that the watersheds would only be evaluated using existing data. There was no stipulation that the data used would not be field verified. It was stipulated that all available data would be evaluated and the need for additional data would also be evaluated. It was also deemed essential that local watershed experts be a part of the assessment effort. It was always absolutely critical that the data used for the evaluation be appropriate, current and accurate. The Core Group selected only four beneficial uses COLD, RARE, MUN, and REC-1 and one stakeholder interest, PFF, for assessment. The selection of these uses and interests was controversial and not unanimous nor was the evaluation criteria or decision flow charts, framework. They were approved for trial use and subject to change if problems were noted. The Core Group did not approve the SHELL beneficial use and Fish Consumption stakeholder interest for assessment.	This comment responds to the information presented but does not suggest that it is inaccurate. No edits necessary.
CG10AC1	Ann Coombs	Chpt. 3- 3C-Audobon did very little work on this-Silicon Valley Toxics Coalition, League of Women Voters, CLEAN South Bay or Western Waters Canoe Club would be better to mention.	Refers to box on “consensus points”. Added LWV to list.
CG10AC2	Ann Coombs	Chpt. 3 3a4- Agencies list should include Mid-peninsula Open Space District	Added.

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CG10TM1	Trish Mulvey	p.1, Chapter 1, intro, end of second paragraph - please use Baylands Goals report definition, not limited to “tidal marsh”	Edited to use language in Goals Report, i.e., “lands that are touched by the tides, plus the lands that would be tidal in the absence of any levees, sea walls, or other man-made structures that block the tides.”
CG10TM2	Trish Mulvey	p.7, Chapter Six text, paragraph five - when you count four POTWs are you including EBDA (discharge near SFO is not exactly south bay) or did you mean three POTWs?	Corrected error.
CG10TM3	Trish Mulvey	p.51, 7b, bullet for DESFBNWR - please update to include authorized acreage from the second refuge bill plus the Cargill framework	Edited to update information.
CG10TM4	Trish Mulvey	p.70, 8f2, paragraph one - please revise as needed to incorporate new approach on fish consumption per Richard McMurtry’s email and WAS workshop 4 discussion with WAC re REC1	Checked comment, determined no edits were necessary.
CG10TM5	Trish Mulvey	p.85, 9e3 - TWG has finished its work; reference to study of remaining uncertainties probably should be BMM/REG or POTWs+SCVURP3/WMI	Changed “TWG” to “WMI”
CG10TM6	Trish Mulvey	p.88, 9e3, San Francisquito - please correct names: Bear Creek subwatershed, Peninsula Conservation Center Foundation, San Francisquito Watershed Council	Made corrections.
CG10LJ10	Larry Johann	<i>Chpt. 2</i> 7 th Para. Last Sentence - Water quality and recreation need to be added to the list of items that need to be considered when balancing our resources.	Made addition.
CG10LJ11	Larry Johann	<i>Chpt. 2</i> 2b. Chapter Nine - Endocrine disrupters should probably be included as a form of pollution as there seems to be an increasing level of concern over this issue.	EDCs are covered in detail in Chapters 6 and 9.
CG10LJ12	Larry Johann	<i>Chpt. 8</i> 8e1. 4 th Para. - Unable to find definition of ABAG. Perhaps it was defined in some other chapter. Recommend having a list of abbreviations, perhaps an appendix, in the document so terms/abbreviations can be easily looked up.	Created a list of acronyms.
CG10LJ13	Larry Johann	<i>Chpt. 8</i> 8e3 - If voter approved taxes are not going to be used to provide “Clean Safe Creeks and Natural Flood Protection” as promised, then taxpayers are due a refund.	Not a comment on the text.
CG10LJ14	Larry Johann	<i>Chpt. 8</i> 8e4 - If the SCVWD is not going to abide by the terms of Measure B then the tax money that has been collected to date needs to be refunded.	Not a comment on the text.
CG10AC3	Ann Coombs	Since fish are such a contentious and high interest topic, could chapter 8 come before chapter 7?	The order of chapters is not meant to reflect the importance of the issues.
CG10TM7	Trish Mulvey	p.16, 3c - please include references to “smart watersheds” (Center for Watershed Protection), and “smart infill” (Greenbelt Alliance)	Added mention.
CG10TM8	Trish Mulvey	p.26, 4c, paragraph five - as far as I can tell it would be hard to find much evidence that the 1994 “staff recommendations” have actually been used in the Santa Clara Valley	Text is factual. (Policies were adopted, even if there is concern about the extent to which they have been implemented.)
CG10TM9	Trish Mulvey	pp.74-75, 8g2 and 8h - I really like this section. Please expand to provide linkage to assessment and monitoring coordination and funding	Comment noted. It would have been premature to expand these draft commitments without some reaction/response from SCVWD.
CG10AC4	Ann Coombs	<i>Chpt. 7</i> 7c1- Add fast forward box “Fish are discussed in Chapter 8”	Added box.
CG10AC4	Ann Coombs	<i>Chpt. 8</i> 8g2- 4 th paragraph “retaining imperviousness” should be “reducing imperviousness”	Corrected error.
CG10AC4	Ann Coombs	<i>Chpt. 7</i> 7c- 3 rd paragraph typo “decision was also”	Corrected error.

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CG10TM 10	Trish Mulvey	p.7, Chapter Seven text, paragraph three - please change coastal salt marsh to tidal salt marsh	Made change.
June '02 Core Group Survey Question #10: More detailed comments on draft Chapters 1 – 9. Comments submitted later (deadline was July 8, 2002).			
ID	By	Comment Text	Response/Possible Action
1-9GB1	Geoff Brosseau	All of the 5A Action topics or keywords are mentioned in the WAP. The degree to which the intent of the WAS Actions is matched in the WAP varies -- sometimes it literally is just a keyword from the Action that is mentioned in a sentence in the WAP. Other times, the WAP copy captures the full intent of the WAS Action. In any case, the comparison is hindered by the WAS Action Worksheets generally being a lot more detailed than the WAP copy. The WAP does not really go down to the level of detail of many of the tasks in the Action Worksheets. So I'm not sure it's worth it or fair to raise concerns where it appears the WAP copy is headed in the right direction (even if it is just a keyword mention). There are a few notable exceptions:	The WAS 5A Worksheets include generic tasks (e.g., conduct surveys, analyze data, create plan, implement plan, analyze results, re-evaluate objectives). It seemed more useful to describe the ideas behind the proposed stream corridor restoration practices, the development of those ideas from a history of successes and failures, the current practices and policies of the local agencies that might implement them, and to outline an approach to improving those practices and policies (i.e. what adaptive management is and how it works).
1-9GB2	Geoff Brosseau	5A1f - "Conduct aquatic habitat assessments." The WAP copy references doing more assessments like the pilot watershed assessments but the WAS Action is focused on a specific kind of aquatic assessment (different method).	Chapter 8 includes a detailed discussion of alternative stream assessment methodologies. WAS is engaged in an "assessment of assessments;" advocating a specific assessment methodology (unclear in the action worksheet) would be premature. See June 21 response letter to R. McMurtry.
1-9GB3	Geoff Brosseau	5A1g - "Acquire high priority habitats and watershed lands." The WAP copy does not focus on actually acquiring property but rather it focuses on providing support and encouragement to others for that and identifying and pursuing funding sources.	Yes, the assumption was made that the WMI itself will not be another land-management agency.
1-9GB4	Geoff Brosseau	5A5a - "Modify water management operations to assure adequate water supply, allowing viable fish and aquatic populations." The WAP copy focuses on human water supply conservation measures with the presumed benefit to "in-stream" uses. The WAP does not mention assuring adequate water supplies for fish and other aquatic populations. And the next steps section does not reflect the intent or tasks under 5A5a.	The issue is a bit more complex than just "adequate water supply," as the intensity and seasonality of flows is also important. See the discussion in Section 6c. The June 2002 draft (Section 6c) included a statement of FAHCE objectives (more detailed than WAS 5A5a); the March 2003 draft advocates that the restoration of natural flow regimes should be incorporated into multi-objective stream restoration projects (Section 8h).
1-9KM1	Kristy McCumby	In general, my feeling on the draft Action Plan is similar to what Geoff said. In many cases, we are heading in the right direction with the action plan, but many of the WAS actions had more clearly defined tasks, that we don't really see addressed in this version of the action plan. I'm not totally convinced that the action plan is the place for an extreme level of detail, but at the same time, I feel strongly that we don't want to lose those ideas for possible future use. It seems to me that there should be at least some reference to the more defined tasks by the various work groups in the action plan.	Many of the Action Worksheets tasks were quite generic; research into the relevant science, professional practice, and policy helped fill in the gaps. The result is that the draft WAP is considerably more detailed as to science, policy, and recommended actions than the Action Worksheets are. Good examples of this are WAS Actions 5B1a, 5B1b, 5B1c.
1-9KM2	Kristy McCumby	WAS Actions 5B1a, 5B1b, 5B1c were indicated as having been discussed/covered Chapter 7. The actions described in the "next steps" section really don't address the monitoring aspect of a restoration project/program. The task listed by WAS in 5B1c was to help define the success of restoration projects. It does not appear that Chapter 7 fully addressed this	The complete text of the tasks in the three actions follows: "Identify species of concern and their critical habitats that need protection or restoration; Identify additional habitat that could be utilized by endangered or protected species that is not currently

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		idea. Chapter 7 talks about adaptive management and developing “programmatic” indicators of success, but it really doesn’t capture the idea of monitoring program development to determine which restoration actions have been successful.	occupied by those species; Implement pilot restoration projects based on information gained from surveys done in WAS action 5B1a; Initiate a species transplant/relocation program as, appropriate, for threatened or endangered species to restored habitats; Develop survey/monitoring programs for pilot projects to determine level of successful restoration.” Monitoring restoration success is mandated by Federal and California guidelines for HCPs and NCCPs (F&G Code Division 3, Chapter 10). Chapter 7 reiterates and emphasizes the need for “monitoring and reporting progress.” In the “Next Steps” it is suggested that the WMI facilitate adaptive management for an HCP/NCCP process. The role of monitoring in adaptive management is discussed in Section 8f5.
1-9KM3	Kristy McCumby	WAS actions 5C1a and 5C1b, according to Appendix Table to the draft, were to have been dealt with in chapter 8. There is a very general reference in this chapter, but doesn’t mention the more specific tasks to accomplish this outreach action to the community. The table also indicated this would be dealt with in Chapter 10. We hope to see more discussion on the role of school and public education on watershed protection and stream restoration actions.	Section 10g (March 2003 draft) incorporates volunteer involvement and K-12 education.
1-9KM4	Kristy McCumby	WAS action 5D1a - Again there is a very general description of this action in Chapter 9, but it seems that the underlying ideas and tasks outlined in the WAS worksheet should be recognized in the Action Plan.	In Chapter 3 “next steps,” added references to the Santa Clara County Grazing Solutions project and the <i>Monterey Bay National Marine Sanctuary Water Quality Protection Program Action Plan</i> (recommended in LUS consensus points) as these documents provide more detailed consensus actions for controlling impacts of rural land uses.
1-9KM5	Kristy McCumby	WAS action 5D2b - The “comprehensive monitoring to assess project implementation effectiveness and the impact of Best Management Practices (BMPs) on streams and water bodies” idea of this action does not seem to be fully reflected in either Chapter 7 or Chapter 8. A revision of this worksheet was provided to the WAPTAG, and included a number of tasks to help implement this action. It doesn’t appear that these were taken into account as this action worksheet was reviewed for the action plan, as the monitoring discussions in these two chapters don’t seem to get at the intent of this action.	The Action Worksheet provided (on website and in binder) included no tasks, only the following generic action: “Implement comprehensive monitoring program to determine baseline conditions, assess environmental variables, assess project implementation, effectiveness and impact of BMPs (control measures).” To provide additional detail and meaning, these ideas were placed in the context of the WMI’s pilot assessments and current thinking on environmental management systems (see Section 8f) and application of these ideas to pollution control (Section 9f).
1-9KM6	Kristy McCumby	WAS Action 5D2d - The handling of this action in Chapter 9 is too simplistic. The intent of this WAS action was to not only address trash removal from creeks, but large debris as well, that causes impacts to streams. The key tasks listed for this action should be reviewed so as to put this action into the proper context.	Added mention of the Adopt-a-Creek cleanup (9d2).. The description of the trash “hot spot” program in Section 9e was expanded to note the potential to track “hot spots” and prioritize cleanup and enforcement and SCVURPPP’s projects that have attempted to implement some of the WAS 5D2d tasks.
1-9KM7	Kristy	WAS Action 5D3a - The way this action is discussed in Chapter 9 seems to miss the idea	The effects of sediment on stream habitat are discussed

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	McCumby	that the sediment itself and the quantity present in streams is a matter of concern, not only for pollutants that may or may not be associated with fine particles. The impacts of fine sediments present in streams is a significant concern for beneficial uses such as COLD and RARE. It is hoped that this chapter can be revised to include that action.	throughout Chapter 8, but particularly in Section 8d. The description of the San Francisquito Creek sediment TMDL in Chapter 9 includes a “rewind” box so that the reader will know to refer to Chapter 8 to understand how sediment affects streams.
Additional, detailed comments on the June draft of Chapters 1-9.			
A-KM-1	Kristy McCumby	2 - last paragraph. The Bay Monitoring and Modeling Sub Group is not listed and they did submit action worksheets.	Added BMM to list.
A-KM-2	Kristy McCumby	5 - first paragraph. The last sentence of this paragraph is very judgmental. What is the reference for this? As submitted in Sunnyvale’s comments before, the tone of some sections in this document may offend some decision makers (e.g., city councils) and care needs to be taken when reviewing past policies and making comments on them based on today’s viewpoint.	The statement is from Chapter Four of the <i>Watershed Characteristics Report</i> . Documents that support the facts and conclusions in the paragraph are referenced in the WCR; the key references are included in the notes for Chapter 3 and in the bibliography. The statement: “Economic polarization became reflected in urban geography, resulting in disempowered, high-poverty urban neighborhoods and high-cost, environmentally unsound development in outlying sensitive areas“ reflects a common point of view among elected officials engaged in urban revitalization efforts. See, for example, the signatories to the “Draft Compact for a Sustainable Bay Area” referenced in Chapter 3.
A-KM-3	Kristy McCumby	6 -4 th paragraph from top. Last sentence - is this totally correct? It’s not only the soil that removes most of the pollutants (sometimes the soil is the pollutant). With the vegetated swale, the vegetation slows down the sediment transport, allowing particles to settle and for the less turbid water to either flow from the area or percolate through sediments to recharge groundwater. Some clarification should be made here.	Revised sentence to state: “There, pollutants settle out or are absorbed by soil before the water drains off slowly...”
A-KM-4	Kristy McCumby	6 - second paragraph under Ch. 5 heading. It seems like there should be a citation here for the first sentence. If we are claiming expensive flood control measures are prone to failure, we should provide a citation based on some specific information? The SCVWD must have had some reason to shift their policy, and if so, it should be cited here and not just made as a blanket statement.	Commenter’s question refers to Gilbert White’s seminal 1942 observations. This issue is covered and cited extensively in Chapters 3, 5 and 8. Notes and bibliography have been included.
A-KM-5	Kristy McCumby	7 -4 th paragraph from top. There are not four treatment works that we know of discharging into South San Francisco Bay. San Jose, Sunnyvale, and Palo Alto are the three we know of ...is there another? Also, the last sentence of this paragraph should have a citation as to where this assertion is coming from.	Corrected “four” to “three.” Documentation of invasive plants is in the WCR. A bibliography is included in the March 2003 draft.
A-KM-6	Kristy McCumby	7 - 2 nd paragraph from bottom. Don’t you just mean “logged” instead of “lumbered off”? (This gives one the impression of trees walking away!) The phrasing here is awkward.	“Logged” might imply something less drastic than the complete removal of all trees usable for lumber. “Clearcut” refers to a modern forestry technique. Revised to “chopped down”
A-KM-7	Kristy McCumby	8 - 1 st paragraph from top. We checked our Webster’s dictionary and the term “predate” refers to something that occurs at a point in time before another event. The term “prey upon” would be a better choice here.	Corrected as suggested.

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A-KM-8	Kristy McCumby	8 -4 th paragraph from top. Last sentence, last clause. Don't you mean the WMI will need to work with <u>park managers</u> and other <u>land managers</u> on designs to integrate recreation opportunities and minimize the impacts on habitats?	Corrected dropped phrase.
A-KM-9	Kristy McCumby	8 - 6 th paragraph from top. The assessment of the Baylands and Tidal Wetlands should be included as a priority here, not just surveys and maps of the areas.	Details are provided in Chapter 7.
A-KM-10	Kristy McCumby	11 - item 3. The last sentence should not end with a parenthetical statement.	Comment noted.
A-KM-11	Kristy McCumby	11 - item 4 This is an incomplete sentence.	Comment noted.
A-KM-12	Kristy McCumby	14 - second paragraph. Using terms such as “utopian schemes” is judgmental and, as stated above, should be “toned down” so as not to create conflicts with the parties we want to read the document.	The phrase is taken from the work cited (WCR Chapter 4).
A-KM-13	Kristy McCumby	23-section 4a. Same comment as for comment #3 above.	Wording is appropriate for a vision statement.
A-KM-14	Kristy McCumby	56 - section 7c4, third paragraph. The term “triple whammy” is a little too colloquial for this type of document.	Deleted colloquialism.
A-KM-15	Kristy McCumby	56 -section 7c4, 4 th paragraph, Second sentence - Shouldn't this refer to feral cats - not house cats? Feral cats are referred to in other sections of this plan. Shouldn't consistency in terminology be maintained? (Plus, there are not many “houses” in the marsh areas where “house cats” could come from to hunt salt marsh harvest mice.)	Made change suggested. (Some prefer to emphasize “house cats” since this makes clear the source of the threat to endangered species.)
A-KM-16	Kristy McCumby	70 section 8f2 Title should be “The WMI's Assessment of Three <i>Pilot</i> Watersheds”	Changed to read “The WMI's Pilot Assessment of Three Watersheds.”
A-KM-17	Kristy McCumby	70 Section 8f2. The most current version of the Watershed Assessment Report should be referred to in this document - not the early draft versions. Make sure the conclusions/suggestions listed in this report match up with what the final version of the report lists in the “Lessons learned Technical Memorandum.” This is undergoing revisions at this time, so it would be best to put a placeholder here so that the most current draft information can be included.	Checked reference with WAPTAG.
A-KM-18	Kristy McCumby	81 item #3. It was not only the pretreatment programs that reduced the quantity of copper being discharged into the bay, but also there were changes in POTW treatment processes for the wastewater itself that resulted in the decreased discharges. You might want to review the Copper/Nickel Action Plan that is incorporated into the POTW discharge permits when revising this statement.	The paragraph suggests that Cu and Ag reductions achieved in the 1980s (and reprised in the early 1990s) were due to pretreatment programs. Upgrades to treatment processes came later and although worthwhile, did not have the same magnitude of impact on the quantity of pollutants discharged.
A-KM-19	Kristy McCumby	87 second paragraph The study that was done by SVTC (San Jose provided some lab analysis) did not successfully measure accumulation of PCBs in transplanted clams. There were indications of uptake of certain congeners of PCBs in the tissues examined, but quantification was not possible. Please refine the citation as to what this study really showed.	Changed “measured” to “indicated”
A-KM-20	Kristy McCumby	88 third paragraph. Last sentence should say “organophosphate” not “organochlorine”. Organochlorines were prohibited from use by pesticide applicators many years ago, and it's the OPs that are the concern now, with pyrethroids, carbamates, and others the next	Corrected the error.

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		concern. Also, the imprecise, colloquial term “bug killer” should not be used. Something more precise and professional should be considered.	
A-KM-21	Kristy McCumby	92 - second paragraph. Why is the term “conversely” used here? Isn’t the process a little different for those items placed on the RWQCB’s “watch list”? The full TMDL process is not imposed on those items on the “watch list” The idea is to collect sufficient information on those potential contaminants of concern to be able to make an informed decision as to their status, and whether they should be included in the next listing.	Deleted “conversely,” replaced “TMDL” with “structured, stakeholder-based”
1-9JN	Jennie Nussbaum	See July 8 letter with suggested edits, annotated with comments in response.	Made edits and annotated letter to show changes made.
Comments on Chapter 10			
ID	By	Comment Text	Response/Possible Action
10LJ1	Larry Johann	In general we feel that Chapter 10 does a fairly good job of highlighting most concerns and problems, which are negatively impacting our waterways, their beneficial uses and their riparian corridors. However, a few critical problems seem to have been overlooked and/or are not adequately addressed. There also appears to be a few topics that are not clearly addressed and this is likely to cause as least some confusion, so these areas need to be clarified.	Comment noted. Detailed comments and responses follow.
10LJ2	Larry Johann	General Substantive Issue. One general area of concern is the status and utilization of the Action Items developed by a number of the WMI subcommittees. It was understood that these Action Items would somehow be incorporated into Chapter 10. At the August Core Group meeting it was stated that now the plan is to include the Actions Items in an appendix to Chapter 10 or to the Action Plan itself. This would be acceptable. The purpose of this comment is to be sure that this commitment is not overlooked.	If future use of the Action Worksheets is desired, this should be brought to the Core Group for discussion and a decision.
10LJ3	Larry Johann	One of the primary Goals of the WMI, EPA, RWQCB, CWA, CEQA and many agency and environmental groups is to protect and enhance designated beneficial uses of our waterways. Many of the Action Items drafted by WMI subcommittees address this goal but it does not seem to be adequately addressed in Chapter 10 and it needs to be.	The WMI’s watershed assessment demonstrated that the definition and designation of beneficial uses are, in general, too narrowly construed to accommodate the goals of the WMI. The relationship is captured in the “Regulatory Corner” box on p. 9 of the draft. Few of the Action Worksheets addressed the concept of beneficial uses directly.
10LJ4	Larry Johann	Section 10d1 - Substantive and Fact Issues. Stream Stewardship Planning should concentrate on improving beneficial uses while improving flood protection or reducing the potential for flood damage, and promoting proper floodplain management. Projects need to be extremely careful in their quest to restore stream beds and banks using rock and wood structures. Unless the geomorphic and hydraulic/hydrologic functions of the waterway are considered, rock and wood structures will likely cause more harm than good. Waterways need to be restored to a stable form and new projects must be designed in concert with the waterways stable form for the project to be successful. Properly designed wood and rock structures can be successfully used to increase flood protection, reduce bank erosion and increase in-stream habitat and help restore and maintain stream stability only if they are incorporated in concert which geomorphic restoration.	See the discussion of geomorphology and stream restoration in Chapter 8.
10LJ5	Larry	The FAHCE, (Fisheries and Aquatic Habitat Collaborative Effort) is not the “SCVWD’s	Corrected the error prior to incorporating the “strategic policy

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	Johmann	project.” FAHCE is a multi agency/stakeholder effort formed in an attempt to resolve issues of a water rights complaint filed by the GCRCDD, with the State Water Resources Control Board, against the SCVWD. It is a collaborative effort as its name implies and includes the following agencies/stakeholders: SCVWD, GCRCDD, USF&WS, NMFS, CDF&G, Trout Unlimited and Pacific Coast Federation of Fishermen’s Association.	objectives” into Chapters 3-9.
10LJ6	Larry Johmann	Section 10d2 - Substantive Issue. The Watershed Action Plan should more strongly encourage unified floodplain management and riparian protection policies and ordinances. Currently there is a hodge-podge of riparian protection policies and most are routinely ignored. Ordinances should also be developed prohibiting construction in the 25 year event floodplain.	This is a major recommendation of the WAP as presented in Chapters Five and Eight.
10LJ7	Larry Johmann	Section 10d3 - Substantive and Fact Issues. This section talks about restoring and expanding the wildlife refuge and wetland protection and restoration on one hand. Then in the very next paragraph it talks about restoring habitat and protecting it against flooding. This is contradictory. Wetlands, by definition are flood prone and frequently flood. If they didn’t they wouldn’t be wetlands. This apparent contradiction needs to be clarified.	This refers to Section 10d4 in the draft. Clarified the point to make clear that the issue is protecting urbanized area from flooding before moving the strategic policy objective into Chapter Seven.
10LJ8	Larry Johmann	Section 10d6 - Substantive and Fact Issues. This section addresses the detention or retention of runoff “where needed to protect streams from erosion and pollutants”. This is not adequate. Something must be done to reduce flash runoff to waterways period. Currently our waterways are being used as storm sewers. Flash runoff negatively impacts and alters channel morphology thus negatively impacting all beneficial uses and greatly increasing the potential for flooding. It is one of the root causes of increased flood risk and beneficial use deterioration and it is inadequately addressed. Until flash runoff is limited/controlled no amount of habitat restoration or flood protection will be successful as projects designed to accommodate today’s flash flows will be inadequate to handle tomorrows increased flows as upstream areas are developed. This results in a continuous cycle of riverine degradation.	See explanation of this issue in Section 4b, “Why Drainage Matters.”
10LJ9	Larry Johmann	Section 10d9 - Substantive Issue. While informational programs, advertising and road shows are fine, it would be far more effective to actively involve community groups and schools in waterway studies and monitoring programs. If the public were involved in waterway monitoring projects they would not only learn the importance of our waterways they would be a part of a team helping to protect them. Just about every creek side resident encountered as well as many other residents have expressed their utter frustration of wanting to help protect our waterways and keep them clean only to be discouraged by agency rules, barber wire topped fences, locked chain link gates and stern warning signs that trespassing on the property is strictly forbidden. Yet looking through the fences one can easily see vagrants and derelicts within the fenced off riparian areas using them as their homes, private junkyards and toilets without sanctions. Education and outreach goals should include programs to get the public and schools actively involved in riparian preservation, watershed studies and monitoring programs with the goal of reclaiming public property and our natural resources.	Ideas from the Action Worksheets related to outreach and community involvement are incorporated in Chapter 10.
10SJ1	San Jose	Section 10a: Dan Cloak’s presentation discussed why the Basin needs the WMI; however,	Revised Chapter 10.

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		the write-up does not state this discussion as clearly as the presentation did. Also, include need to balance economic growth with environmental needs.	
10SJ2	San Jose	Definition of a strategic policy objective: A policy is an overall guiding principle/plan. The word "policy" is overused in this document and not clearly defined. The Action Plan needs to be conscious of its title: actions need to be at the heart of the discussion. While overall objectives are good, each issue area should identify one or two specific actions the WMI could take and focus on those rather than the overall policy objective. "Policies and Programs" is overused and not defined.	Changed "strategic policy objective" to "strategic objective" in throughout the WAP in response to this comment.
10SJ3	San Jose	Section 10a: description of what is in section 10e should include criteria for measuring success. Then section 10e needs to include that discussion.	Incorporated discussion measuring success into revised Chapter 10.
10SJ4	San Jose	Section 10b3: the length of this example dilutes its strengths. Almost all information except for the last two paragraphs should be deleted, as it repeats information from previous chapters. A short intro paragraph, then the last two, then a concluding paragraph on how the agencies must coordinate and define objectives and adapt, would improve the example. Also, the title might be stronger as: An example of the need to coordinate. The example used, should in the end be one that the WMI agrees is a priority.	Revised Chapter 10, and included results of Core Group discussion of priorities.
10SJ5	San Jose	Section 10c2: either under WMI strengths or under key functions (10c3), need to list the ability to leverage resources (including financial resources/grants). How will key functions/strengths lead to implementing actions? Also need to have "reporting/evaluating effectiveness/celebrating success" as one of the key functions.	Revised Chapter 10.
10SJ6	San Jose	Section 10d: The first box in this section needs to strengthen the discussion on the link to the action sheets. If action sheets did not contain specific enough actions to implement, and/or if only few actions went beyond current programs, this needs to be stated more clearly. The word "policies" is again confusing in this section and for the most part "programs or mandates" would be sufficient.	Added discussion of the Action Worksheet Process to Chapter One and to Chapter 10.
10SJ7	San Jose	Section 10d: the prioritization process needs to be clarified to distinguish the policy objectives from the chapters 3 through 9. How was the analysis made/prioritization agreed upon by the core group? At least need a placeholder for this to ensure that what is in this chapter is a consensus priority for the watershed and why.	Incorporated subsequent Core Group discussion of priorities into revised Chapter 10.
10SJ8	San Jose	Section 10d: This section needs to show how the 9 policy objectives are indeed priorities of the WMI. While we see great potential in further refining these objectives into something that the WMI can use to prioritize actions, as currently written, the policy objectives resort the action sheets into 9 issues, when previously they were sorted into 7 chapters. Instead of trying to reorganize and fit all actions, the Action Plan should focus on identifying key projects/programs that the WMI can support or undertake. For example, the WMI could agree that the following specific projects within these areas are priorities for the next few years: Mercury TMDL, POTW permits, stream stewardship plan, work on C3 provisions. Also, the activities of the WMI could be more detailed in the sections. For example, WMI could set up a convening body on specific issues, facilitate discussion, and provide a forum for consensus building on these key priorities.	Incorporated subsequent Core Group discussion of priorities into revised Chapter 10.
10SJ9	San Jose	Section 10d: There is too much overlap between 10d1 and 10d2 (Stream stewardship	As the WAPTAG discussed in February 2002 and subsequent

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		<p>planning and riparian planning), which could be combined into one issue area. Section 10d7 (Better assessments, TMDLs, discharge permits) should be split to have one on better assessments/TMDLs and a separate area on the collaborative permit development process and regulatory certainty. Section 10d2: We do not currently know what Ordinance 83-2 will say when finalized. Therefore please add the text "To the extent reasonably practicable" to the paragraph on Page 10 which currently states: <i>SCVWD, County Parks, VTA, and Santa Clara Basin cities and towns should align their policies and integrate their planning of floodplains and riparian corridors. Integrated planning should incorporate the cities' riparian corridor policies, SCVWD's Ordinance 83-2 (including planned revisions), applicable provisions in the cities' and county's General Plans, existing and planned recreational uses within floodplains and riparian areas, the Countywide Trails Master Plan and Uniform Interjurisdictional Trail Design, Use and Management Guidelines, the National Flood Insurance Program (FEMA Maps) and benefits attainable under the FEMA's Community Rating System. In addition, the integrated plans should consider existing and potential habitat for the red-legged frog and other riparian species. Plans may also need to consider potential locations for facilities that detain runoff or strain trash from stormwater. New and rebuilt road and rail alignments and stream crossings should preserve riparian corridors and accommodate flooding.</i></p>	<p>meetings, the issues in the Action Worksheets could be lumped or split in many ways. The WAPTAG consensus on "issue areas" is reflected in the outline presented to the Core Group in March 2002.</p> <p>Specific edit made as requested before the strategic policy objective was moved to Chapter Five.</p>
10SJ10	San Jose	<p>Section 10d3: The word "preserve" is not defined and appears restrictive. The words "protected areas" would be more appropriate.</p>	<p>Added reference to California NCCP Guidelines.</p>
10SJ11	San Jose	<p>Section 10d4: the first paragraph should include a statement that the WMI advocates looking at all impacts to the watershed, including potential effects of restoration on water quality and flooding issues.</p>	<p>The strategic policy objective has been moved to Chapter Seven, where this point is made at length.</p>
10SJ12	San Jose	<p>Section 10d5: what would maps be based on? Need to state what type of data; data review would generate these maps. Could this section also include the concepts of mitigation banks and cross-habitat trading? In the bullet list, add "based on watershed protection principles referred to in chapter ..." to the end of the sixth bullet.</p>	<p>The strategic policy objective has been moved to Chapter Three, where the reasons for having detailed maps identifying natural resources and potential restoration areas are described in detail.</p>
10SJ13	San Jose	<p>Section 10d5: Consider adding the text "flexible parking requirements" as a consideration to the statement "...local government should consider using reduced development fees, fast-track permit approvals, tax rebates, tax caps, tax deferrals, enterprise zones, or redevelopment districts to encourage high-density development that is consistent with the WMI's vision."</p>	<p>Flexible parking requirements are identified in Section 4d.</p>
10SJ14	San Jose	<p>Section 10d7: The section on TMDLs should include a list of the currently planned TMDLs, a way to prioritize which is most important, and specific actions that the WMI would take on each that affect this watershed. The "structured process" should be described more, e.g., use the copper/nickel as a model but acknowledge the significant cost of that effort (\$2million). The section focuses too much on TMDLs to allow prioritization of other issues, such as EDCs.</p>	<p>The currently planned TMDLs, as well as "watch list" issues such as EDCs, are listed and discussed in detail in Chapter 9.</p>
10SJ15	San Jose	<p>Section 10d8: So far water recycling has been funded solely by Cities, however, this section appears that SCVWD has had a lead role.</p>	<p>See the detailed discussion of water recycling in Chapter 6.</p>
10SJ16	San Jose	<p>Section 10d9: too much focus on streams, need some emphasis on education about the</p>	<p>The section reflects the emphasis of the Watershed Watch</p>

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		Bay. The first bullet under 10d9 is a very important future activity for the WMI.	campaign and of the Action Worksheets.
10SJ17	San Jose	Section 10e: what are “targeted stakeholder processes” and how is “critically important” defined. Still need to describe a prioritization process that encourages actions to occur. Everyone can agree on the policy level, but that will not achieve actions without specifics.	Revised Chapter 10 to include subsequent Core Group discussions of prioritization.
10SJ18	San Jose	Section 10e1: City supports paragraphs 4 and 5. Could be a good lead in to the need to prioritize and provide facilitation to reach consensus.	No response necessary.
10SJ19	San Jose	Section 10e2, bullets on criteria should include: likelihood of implementation.	Section deleted in response to other comments.
10SJ20	San Jose	Section 10e3, second to last paragraph should be more prominent, as this is what will actually be a good role for the WMI. Encouraging/facilitating implementation should be included.	These points (i.e., that WMI should facilitate stakeholder processes, help bring consensus policy recommendations to decision-makers, and formulate, refine, and disseminate the WMI message) are emphasized in the revised Chapter 10.
10SJ21	San Jose	Section 10f: should include discussion of how specific workplans will be developed (at least a placeholder).	If there is still an interest in developing “workplans,” this should be brought to the Core Group for discussion and action.
10SJ22	San Jose	Section 10a: description of Section 10b: Should be environmental management setting, rather than policy.	Section deleted.
10SJ23	San Jose	Description of section 10d should include regulatory certainty along with streamlining.	Revised Chapter 10 includes an inset box on regulatory certainty and streamlining.
10SJ24	San Jose	Section 10b1: Often environmental policies ... began: Policies are usually developed, than agreed to as guiding principles. They don’t begin at a precise date.	Revised to make clear that “policies” means laws, regulations, General Plans, ordinances, and administrative procedures. These are adopted or enacted by governing bodies. The precise dates are in the public record, and many are referred to in Chapters 1-9.
10SJ25	San Jose	Section 10b3: the County is missing from the list of agencies implementing HCP.	Revised text of strategic policy objective and moved to Ch. 7.
10SJ26	San Jose	Section 10d4, second paragraph, last sentence: use “restore” instead of “convert”	Revised text of strategic policy objective and moved to Ch. 7.
10SJ27	San Jose	Section 10d4, fourth paragraph: too much focus on endangered species, state “for all species” and maybe add “with elevated concern for endangered and threatened species.”	Rewrote sentence to emphasize ecosystem protection, moved to Section 7f.
10SJ28	San Jose	Section 10d7, second paragraph: missing EPA and BCDC. Third paragraph: add “and provide the specific technical basis for such a finding” after “impaired.”	Added EPA and BCDC .Rewrote sentence noted to emphasize need for technically based decision-making. Move to Ch. 9..
10SJ29	San Jose	Section 10d7: 5 th paragraph: add “cost effectively” at the end of the last sentence.	Incorporated the concepts of reasonableness and cost-effectiveness into the strategic policy objective and moved to Ch. 9.
10SJ30	San Jose	Section 10f: second paragraph: why 10 years from now, given the review of history, this is already the case. But we should detail what we learned: that working together can take time, but that in the end it has resulted in a shift for environmental management within and among the agencies and stakeholders.	Rewrote conclusion.
10SJ31	San Jose	Too many parentheses make the document difficult to read.	Considered during rewrite.
10SJ32	San Jose	Section 10a: description of section 10c: reword: describes some obstacles to success, suggests how the WMI might leverage ...	Rewrote section.
10SJ33	San Jose	Section 10a: “provide economic benefit” – this is not a primary objective of the WMI. Reword to something like “balance environmental and economic needs.”	Phrase is in the “General Features” document approved by the Core Group in March 2002.
10SJ34	San Jose	Description of section 10e: explain “structure” of what.	Deleted section.

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10SJ35	San Jose	Section 10b1: title is too conversational, suggested titles: Past environmental management	Deleted section..
10SJ36	San Jose	Instead of "limit urban sprawl" use "address the population increase"	The explicit objective of the USAs was to "limit urban sprawl." Deleted section.
10SJ37	San Jose	Section 10b2: second paragraph: revise last part of last sentence: to "develop and implement effective environmental regulations and policies"	Deleted section.
10SJ38	San Jose	Third paragraph "savvy and nimble" – delete parenthetical "they answer" reword to "implement"	Deleted section.
10SJ39	San Jose	Fourth paragraph: what does "rationalizing" mean in this context?	Deleted section.
10SJ40	San Jose	Section 10b3, last paragraph: funding "behind them" change to "necessary to implement"	Rewrote this argument and moved to a different section.
10SJ41	San Jose	Section 10c1: starting with obstacles gives a negative feeling. The important issues that watershed planning takes time and resources is repeated in the next section in a more positive way. Suggest deleting 10c1.	Deleted section.
10SJ42	San Jose	Section 10d1: paragraphs 4 and 5 are not necessary as they repeat previous information and dilute the message that the WMI will support stream stewardship planning and how it will be supported.	Deleted section.
10SJ43	San Jose	Section 10d4, third paragraph: delete "and squarely"	Deleted as suggested before moving the strategic policy objective to Chapter 7.
10SJ44	San Jose	Section 10d7: The word heuristic is confusing. Describe process instead.	Deleted "heuristic" before moving the strategic policy objective to Ch. 9.
10SJ45	San Jose	Section 10d9, first paragraph: what does "major media market" mean. This parenthetical is unclear, delete or expand.	Rewrote to make clear the special challenges of using mass communications to change behaviors in a major media market;added reference.
10SJ46	San Jose	Section 10e: Instead of "accomplished a lot" use: the WMI has made significant accomplishments over the last 6 years.	General style of this document is to omit unnecessary words and to use short words instead of long words.
10TM1	Trish Mulvey	are we filling a need? my preliminary assessment is that these are probably the right list of things to aspire to; however, it is not at all clear which (if any) are "ripe" for substantive advancement now or soon. have we considered the options? i would also like us to consider whether they would likely get done without any WMI because of other drivers (like c.3 or the cargill acquisition). also, instead of an enhanced WMI as described in this chapter, the other option i think we should consider is a "downsized WMI" that has more or less a "parallel tracking" role and can help make stakeholders available as short term issue applications are presented (maybe "stakeholders 'R' us" as a working name) - probably not unlike the estuary project's implementation committee. have we thought it through? i think COS is working on that as best we know how for the moment. it would be really helpful for the folks who might see themselves as potential partial funders or sponsors to weigh in on this discussion - soon - especially as to whether there will be "institutional support" for the enhanced WMI concept.	Chapter 10 has been rewritten in response to this comment and ensuing COS and Core Group discussions in August through November 2002.
10AC1	Ann Coombs	Since the actions need to be acted on by busy people, they should be written in quickly accessible, concise format with numbered statements for easy referral. There should be some things which can be acted on in the near future as well as longer term items to be	The actions were further developed/edited and moved to Chapters 3-9.

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		worked on.	
10AC2	Ann Coombs	Too much of this chapter reads like an excuse for building a new bureaucracy. The people who control the money are not likely to be eager to spend money on that.	Chapter has been extensively rewritten in response to this and other comments. Most discussion of WMI structure has been deleted.
10AC3	Ann Coombs	The “What the WMI Can Do” sections are very repetitious. This material could be put into one separate section and referred to.	In response to this comment, these sections were consolidated with the “next steps” at the end of Chapters 3-9.
10AC4	Ann Coombs	One weakness of the WMI is that not all cities participate. Has anyone discussed the possibility of SCVURPPP and WMI combining? SCVURPPP has commitment, membership, money, and an existing staff.	This was one of the structural forms considered in the “straw poll” exercise at May 2002 (?) Core Group. It wasn’t acceptable to some stakeholders (notably SCVURPPP).
10AC5	Ann Coombs	I think this chapter would be most effective if it pulled actions from Chapters 1-9, which are written in narrative style with good explanations, and presented them in a rapidly accessible format for busy decision makers.	The actions were consolidated in Chapters 3-9.
10COS1	COS	The chapter summarizes the actions for addressing strategic policy objectives. Overall, the linkage to the Watershed Action Worksheet development process needs to be strengthened.	The Action Worksheet process is described in the revised Chapter One.
10COS2	COS	This chapter needs to address how this Action Plan will address the implementation objectives/performance measures that WMI developed	Included in revised Chapter 10.
10COS3	COS	This chapter needs to discuss how WMI would move forward, e.g., what are the core WMI Driven projects, what are the initial steps to ensure actions are considered for implementation, what the framework would be to support these steps.	Chapter 10 was revised following COS and Core Group discussions regarding WMI structure and priorities.
10COS4	COS	The chapter needs to strengthen its discussion on other non-strategic issues, such as watershed and site-specific issues.	In the main, watershed-specific and site-specific issues are not included in the Action Worksheets.
10COS5	COS	<p>This discussion needs to tie in the Evaluation of Actions fields that WMI stakeholders came up with in filling out each of the Action Sheets. These fields included benefits, incentives, performance measures, and hurdles to success.</p> <p>Discuss the mechanisms or framework for implementation, such as triggers for updating WAP (if any), funding, core expertise needed, and incentives for local entities to commit resources to WMI actions.</p> <p>Discuss WMI's role for different types of actions: What is WMI's role for actions that need collective actions, what's WMI's role for actions that are carried out by two or more WMI signatories, and what's the role for actions that individual signatory are committed to on their own.</p> <p>Discuss progress indicators/performance measures and how they would be used.</p>	<p>The evaluation criteria in the Action Worksheets appear to be “brainstormed” and are not in the context of a any conceptual model or framework for implementation.</p> <p>Chapter 10 was revised based on current COS and Core Group consensus regarding WMI structure, priorities, and roles.</p>
10COS6	COS	For the Policy Objectives, there are some overlaps among these objectives. What is the framework for minimizing overlaps and maximizing synergies?	The framework for accomplishing this alignment, coordination, and integration is to involve the WMI in the processes identified in the strategic policy objectives and next steps.
10COS7	COS	Strategies for regulatory streamlining need to have a separate section.	In the revised draft, a text box notes the issues of regulatory streamlining and regulatory certainty.

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10COS8	COS	Prioritization section needs to take into account WAPTAG's discussion on Prioritization. In addition, we need to provide the framework for helping agency/or WMI stakeholder staff and volunteers get the WMI priorities implemented. What is the most effective and efficient process and institutional arrangement for implementing WMI Collective Projects such as the WAP?	The revised Chapter 10 summarizes Core Group discussions subsequent to this comment.
10COS9	COS	The organizational infrastructures to support the functions identified needed to be discussed. We acknowledge that organizational infrastructure might be different for each function identified. However, options as well as resource requirements or constraints need to be discussed. The COS will start the discussion, and will request that WAPTAG chair, who serves on COS, to help incorporate/expand upon COS' discussions.	Chapter 10 was revised following Core Group discussions.
ADDITIONAL COMMENTS (RECEIVED IN AUGUST – OCTOBER, 2002)			
10RM1	Richard McMurtry	Section 9f3 discussion of Guadalupe mercury TMDL. Santa Clara County and SCVWD have removed or immobilized much of the mercury-laden sediments <i>on the mine site property</i> . Note that extensive areas of mercury deposits that had moved downstream off of the mine property would not be investigated.	Revised description to note the limits of the DTSC review.
10RM2	Richard McMurtry	There are still unremediated debris fields on County-owned property that are clearly identifiable from aerial photographs readily available on the web and easily verified by site inspection. The debris fields appear to discharge pollutants into waters of the State at Randoll Creek, which drains into Alamos Creek below Almaden Reservoir.	Added this text as a footnote.
10RM3	Richard McMurtry	Update information on FAHCE stream monitoring.	Updated based on information submitted by SCVWD (see comments 10SA13 and 10SA14).
10RM4	Richard McMurtry	3d: add "innovative financing methods to reduce acquisition costs and minimize abrupt displacement of homeowners, such as seller leaseback of their properties during project planning periods."	Added.
10WD1	SCVWD	Ditto COS' Comments Distributed on August 19, 2002.	Comment noted.
10WD2	SCVWD	In addition, specific edits on each of the nine issues will be forthcoming upon further discussion among District staff.	Comment noted.
10WD3	SCVWD	Who is the audience of this report? The draft circulated July 29, 2002 serves as a good draft for the audience of WMI participants- water resource planners, engineers, environmental advocates and regulators who value and take part in the WMI process. It is also probably a good draft of a textbook chapter that might be used by a graduate or UC Extension course on Watershed Management. I had expected that public officials and other interested parties who are not active participants in the WMI were an important audience for this report. This is not the draft for them. They need something that is much shorter such as the San Francisco Creek CRMP's Draft Watershed Management Plan that I passed out at the December retreat. The presentation that Dan Cloak gave at the August 1st Core Group meeting that tied the WMI Vision map to the Watershed Action Plan would be a great basis for the more general version.	The audience was discussed at the January Core Group retreat and documented in the General Features document approved by the Core Group in February. The March 2003 draft includes an executive summary.
10WD4	SCVWD	For the Watershed Action Plan to be successful, it needs to be understood and accepted by a wide range of people, not just those who are already part of WMI's nuclear family. As	The March 2003 draft includes an executive summary.

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		a great deal of time and effort has already been expended on this project, I am concerned that the generalized version will never get produced because we will run out of resources to expend on the subject. It's time to develop a more-generalized version that can be evaluated on a parallel track with the in-house, more complex version.	
10WD5	SCVWD	10b1: Move the first sentence to the beginning of section 10b2 and delete the rest.	Section deleted.
10WD6	SCVWD	10c1 Reword the first sentence to state what the obstacle is. For instance, lack of alignment and coordination between many plans and policies is an obstacle to success for basin habitat plans, ... Overcoming this obstacle is really the strength of the WMI, so we should emphasize it.	Section deleted in response to comments from other stakeholders.
10WD7	SCVWD	10c3.1 Seams to over reaching. In the context of the report, our expertise is related to water and environmental issues. This could be read to mean something much broader.	Other comments emphasize that "facilitating stakeholder groups" is an important function of the WMI.
10WD8	SCVWD	The nine policy objectives are really the "meat" of this chapter. They should all be captured in the more generalized version.	Comment noted.
10WD9	SCVWD	10d5 The first sentence: add to identify natural resources and potential restoration sites as well as after maps. Then delete and.	Added additional detail from Chapter 3 to this description before moving it to Chapter 3.
10WD10	SCVWD	10e Consider deleting section all together and developing it as a separate report. IT requests that a great deal of power be given to the WMI, which seems politically unreasonable. Might be good to rework as part of an annual report that participants could share with their respective boards.	Section deleted all together.
10WD11	SCVWD	Include a simple flow chart of the WMI structure.	Current WMI structure is discussed in the revised Chapter One.
10WD12	SCVWD	Include a matrix of the objectives that uses the categories from the Evaluation of Action forms filled out last year.	Action worksheets were too inconsistent to create a meaningful matrix.
1-9SA1	SCVWD	49 / 6g-6g7. These are all old ideas that were tried in the 80's for the 90's. We are well past these type of actions.	These are the actions that were in the Action Worksheets.
1-9SA2	SCVWD	49 / 6g2. What does this "reducing treatment plant influent" have to do with sustainability of water supply?	Comment noted.
1-9SA3	SCVWD	48 / 6e5.10-11 Where is the mention of SCVWD roles? We have spent millions of dollars on SBWR studies ad incentives.	SCVWD contribution to the Metcalf pipeline was included in an earlier draft but deleted per WAPTAG comments. Description of SCVWD expenditures on water recycling can be incorporated if SCVWD makes the information available.
1-9SA4	SCVWD	47 / 6e5.4 Is this an appropriate editorial voice? Seems to have a pretty strong bias.	This was the only comment received on this section.
1-9SA5	SCVWD	46 / 6e4.4-5 The statement in paragraph 3 "The City of San Jose gives away 1.6 gallon per flush toilets" is a part of the SCVWD program. The City of San Jose pays for this.	These paragraphs were edited per City of San Jose comments. SCVWD is not mentioned.
1-9SA6	SCVWD	44 / 6c.6 The FAHCE process has studied the effects of water supply operations on coldwater fisheries and developed plans to modify reservoir releases and other water supply and operation to maximize the availability of suitable coldwater habitat.	Updated text to incorporate this point.
1-9SA7	SCVWD	44 / 6e1 San Felipe remains a critical component to meeting demands. Current planning seeks to capitalize on opportunities not available in 1975 (i.e. recycling, banking, etc...)	Revised sentence to clarify.
1-9SA8	SCVWD	42 / 6b.6 Where is the discussion of HH? Future water supply reliability in the Basin is highly dependant on SFPUD.	The paragraph notes that some Basin suppliers buy Hetch Hetchy water. If additional detail is needed, the District should supply that detail.

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1-9SA9	SCVWD	42 / 6b.8 This program was suspended in the early 1990's. A new program may be developed in the future depending on the outcome of IWRP and other studies.	Revise to note program was suspended (consistent with 8e2).
1-9SA10	SCVWD	64 / 8c.4 Fails to mention the 1.0 million dollars and people that have moved into the Valley since WWII as a contributing factor to decline.	Discussed in Chapter Two.
1-9SA11	SCVWD	64 / 8c.6 These activities are extremely rare in the watershed today.	Discussion of gravel mining and groundwater recharge basins and link to predation by non-native fish is included because it was the subject of an Action Worksheet.
1-9SA12	SCVWD	64 / 8d This section seems to have been written and pasted from some other document. Pretty poor description of what is actually occurring in the basin.	Comment noted. Suggest that, before publishing final draft, this section be reviewed by one or more persons with expertise in the hydrogeomorphology of the Santa Clara Basin.
	SCVWD	66 / 8e1.5 Citation?	Citation was provided in the June draft.
1-9SA13	SCVWD	71/8f4. In contrast to the WMI and SCVURPPP assessments, FAHCE Field Studies were completed in 2001. This work informed the development of the settlement. No new monitoring is planned until CEQA and SWRCB processes are completed. None of the stuff listed above	Section revised in response to these comments.
1-9SA14	SCVWD	72 / 8f4.2 Settlement agreement completion date is "December 2002". CEQA process of monitoring is anticipated to be complete in the "Winter of 2004". The actual monitoring may begin in the "2004-2005 fiscal year".	Section revised in response to these comments.
1-9SD1	SCVWD	5a. Add dash between "streams" and "from" in 1 st paragraph.	Edited sentence.
1-9SD2	SCVWD	5a. Note that streams don't meander in steeper reaches.	Sentence edited to reflect this point.
1-9SD3	SCVWD	5a. Floodplain areas should feature riparian and upland forest as well as recreation and other uses.	Sentence edited to reflect this point.
1-9SD4	SCVWD	5b1. [Marked the following text:] "In undisturbed watersheds, creeks and rivers overtop their banks once every year or two (on average). These frequent, small floods refresh streamside vegetation, recharge local groundwater, and renew freshwater wetlands. They also move accumulated sediment and help maintain characteristic stream morphology. Creeks and rivers must also accommodate larger floods, the ones that recur every five or ten years, and the really big floods that may come only once in a century." Comment: This stuff doesn't apply precisely to many/most Santa Clara County streams which are naturally incised and perched . Therefore "bankfull" is well within the channel. See Seena Hoose.	Suggest that, before publishing final draft, this section be reviewed by one or more persons with expertise in the hydrogeomorphology of the Santa Clara Basin.
1-9SD5	SCVWD	5b1. [Marked the following text:] "During larger floods, a natural creek or river spreads across its floodplain. Adjacent swamps become lakes, low-lying areas become swamps, and normally dry areas are briefly inundated. Fish and other aquatic animals enjoy a brief heyday of feeding, breeding, spawning, and migration. Then the floodwaters recede." Comment: Even in their natural state... Unfortunately, this generic description doesn't apply to most of the Santa Clara Valley, where creeks are largely perched and when flow escapes, water runs away from the creek and don't flow back. Talk to Seena Hoose."	Suggest that, before publishing final draft, this section be reviewed by one or more persons with expertise in the hydrogeomorphology of the Santa Clara Basin.
1-9SD6	SCVWD	5b3: [Marked the following text:] The NFIP defines the floodplain as areas having a one percent chance of being flooded in any given year. (Stated another way, this is the area that would be inundated by a once-in-100-year flood).	Changed references to "100-year flood" to "one percent flood."

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		Comment: Let's not perpetuate this myth! Instead: "Sometimes the 1% flood is called the 100-year flood, because it is the flood flow that would be equaled or exceeded about a hundred times in ten thousand years – or an average of one time in one hundred years.	
1-9SD7	SCVWD	5b3: [Marked the following text:] "Under the NFIP, Federally subsidized flood insurance is made available to property owners..." Comment: Delete "Federally subsidized".	Deleted.
1-9SD8	SCVWD	5b3: [Marked the following text:] "Only farming, pasture, forestry, recreation and open space are allowed in this area." Comment: Not true. The preferred approach is to avoid all development there.	Deleted sentence.
1-9SD9	SCVWD	5b3: Delete "The NFIP allows development in this area." Delete "the bottom of" the lowest floor raised above predicted flood elevation. Add "or be elevated" to "Commercial buildings must have reinforced walls..."	Edited as suggested.
1-9SD10	SCVWD	5b3: [Marked text:] "Federal technical assistance helps local flood control agencies, such as SCVWD, assist municipalities with the program." Comment: What does this mean. I can't think of an example of this.	Deleted sentence.
1-9SD11	SCVWD	5b3: Paragraph beginning "In 1990..." Delete "an additional"	Deleted as noted.
1-9SD12	SCVWD	5b3: Delete reference to "Hey Noah!" – outdated.	Deleted.
1-9SD13	SCVWD	5b3: Edit last sentence in section to say "nearly all" Santa Clara Basin cities and towns...	Edited as suggested.
1-9SD14	SCVWD	5c1: First sentence: Note that streams have summer water only from dam releases.	Delete phrase.
1-9SD15	SCVWD	5c2: Delete reference to "streamside freshwater marshes" because most of our streams are incised, so the only freshwater wetlands are either in-stream or created (e.g., percolation ponds, gravel mines).	Citation is from City of San Jose Riparian Corridor Policy Study. Also see WCR page 7-32.
1-9SD16	SCVWD	5c2: Delete the word "ruderal" because it's arcane.	Deleted.
1-9SD17	SCVWD	5c3: Missing end quote	Corrected.
1-9SD18	SCVWD	5c4: Last paragraph. SCVWD streamside design guidelines don't prefer loop streets to frontage streets.	Corrected. Preference illustrated in a graphic with the text.
1-9SD19	SCVWD	5c4: Sue's CPRU actions need to be added here.	Comment noted.
1-9SD20	SCVWD	5d: A nicer example is the 1977 Tri-Party Agreement (SCVWD, Santa Clara County, City of San Jose) to create a joint-use flood management project, park chain, and trail along several miles of Upper Penitencia Creek. Land has been reserved and planning and design is currently underway.	Comment noted.
1-9SD21	SCVWD	5d: District's Clean Safe Creeks Program?	Discussed in Chapter 8.
1-9SD22	SCVWD	5e: Delete hyphen in "pollution-prevention programs."	Hyphen deleted.
1-9SD23	SCVWD	5e: [Marked text]: SCVURPPP, and local urban runoff pollution-prevention programs, support school programs for kids to learn about creek and riparian habitats." Comment: SCVWD has an extensive classroom program. Talk to Kathy Machado.	Added SCVWD to list.
1-9SD24	SCVWD	5f1: [Ways to Integrate Planning and Riparian Stewardship] Comment: Another noteworthy example: After the 1997 Coyote Creek flood devastated three homes that were located too close to the creek, SCVWD purchased the homes and land (at pre-flood market value) and turned the property into an outdoor classroom. Floodplain management hazard mitigation and education all achieved at one location.	Comment noted.

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