

MASTER #	Number	Document	Location	Commenter	Comment	Rating	Approach/Response	Questions for HOSP Committee	Done
1									
2	100	Appendix	A-1-A-11	Mary Zauner & Sharon Green, LACSD	Some of the 450+ items in the list of regional Los Angeles County planning efforts are projects, rather than planning efforts (such as JWPCP Marshland Enhancement and Whittier Narrows Water Reclamation Plant UV Disinfection Facilities), or are for Orange County rather than Los Angeles County (Orange County Open Space and Multi-nuruse Onnortunities).	easy	Changed title of appendix		x
3	149	Appendix	B-1	Joyce Dillard, Public	<i>"Two specific examples where future work could dramatically improve the data sources are (1) the historical extent of wetlands, and (2) the National Wetland Inventory of current wetland extent. As better data become available, the habitat targets could easily be updated to reflect these data by applying the methods described here."</i> Needed are overlays of development, and especially port development and flood channel development, as historic wetlands may never return.	medium	Added to to recommendations		x
4	3	Appendix	B-2	LACFC	The report states that miles were converted to acres but does not provide any metric for how this was done. To be transparent as stated in the paragraph above, this metric should be included.	easy	clarify in text, clarify in appendix		emailed Amanda
5	4	Appendix	B-3	LACFC	The ways in which privately owned wetlands will be protected is unclear. If the only way is acquisition of the area to ensure its protection, then this should not be included as a goal. Requiring the purchase of private land creates a potentially unattainable goal.	medium	add to recommendations		x
6	5	Appendix	B-4	LACFC	The basis for setting protection/enhancement/creation goals (20%, 25%, 10%) are not clearly explained. Provide a description of choices made to set this goal.		These values were originally set by Professor Richard Ambrose of the consultant team at 10% across the board. Resulting targets were reviewed by the HOSP Committee and adjusted in an iterative fashion.	Please confirm that this is the appropriate response. If Shelley or Nancy would like to draft language for inclusion in the report, please let us know.	x
7	150	Appendix	B-5	Joyce Dillard, Public	<i>"Two kinds of losses are considered: (1) wetlands that were destroyed and replaced by non-wetland habitat, and (2) wetlands that were converted from natural wetland habitat to man-made wetland habitat, such as a flood control basin or a concrete lined channel. The target for the restoration or creation of wetland habitat was calculated as 10 percent of lost wetland habitat plus 10 percent of converted habitats."</i> Where is the realistic factor of flood control and sea-level rise in this description and target. The military is involved with sea-level rise (flooding) and it is national security.	hard	comment noted		x
8	6	Appendix	B-5	LACFC	Most FCD facilities should not be considered a wetland or included in these calculations.	hard	Added to to recommendations		x
9	7	Appendix	B-5	LACFC		easy	Clarified		x
10	101	Appendix	B-7	Jan Dougall & Randal Orton, Las Virgenes MWD	1 st paragraph, 2 nd sentence: "The NWI data indicate there currently are 1,152 freshwater wetlands in the subregion (excluding lakes)." Is 1,152 a count of discrete wetlands or should there be a unit, such as acres?	easy	Revised		x
11	102	Appendix	B-7	Jan Dougall & Randal Orton, Las Virgenes MWD	1 st paragraph, 2 nd to last sentence: "Therefore, the <u>freshwater wetland restoration/creation target</u> was calculated as 10% of 384 acres, or 38 acres." This will avoid any confusion.	easy	Added proposed revision		x
12	8	Appendix	E-13	LACFC	Charts are only included for South Bay sub-region. Please include the rest of the charts for all the other sub-regions.	medium	Corrected error.		x
13	103	Appendix	G - K	Mary Zauner & Sharon Green, LACSD	Was an analysis done between the Land Use Figures in the subregional documents compared to the Park and Recreation Targets in Appendices G – K to ensure no high priority parks and recreation are designated in areas with water management-related infrastructure (such as wastewater treatment plants, water infrastructure, or flood facilities)? Also, it appears that many areas designated as high priority areas for parks and recreation are in areas designated as industrial or commercial areas, which may cause some concern among stakeholders.	medium	clarify in text, clarify in appendix that maps show areas where historical and existing, and/or park poor areas are located. These are not areas where open space is mandated, just shown for informational purposes.		x
14	9	Appendix	General Comment	LACFC	There only worksheets for the OSHARP plan. It is unclear how will these be used in conjunction with the other goals.	easy	comment noted. This is the OSHARP report, so only targets for the OSHARP are noted.		x
15	10	Appendix	I-7	LACFC	When recharging water within San Gabriel River Watershed, you need to ensure you are not moving water that is already "owned" to somewhere else. All of the water in the watershed is adjudicated.	easy	comment noted. the OSHARp is a planning level document and water rights issues need to be handled at the project level.		x
16	11	Appendix	L-1	LACFC	This does not take into account any projects that may be used to store water in the system but then deliver it downstream to a spreading ground for infiltration.	medium	More complex modeling would be required to estimate the benefits of this type of system, and would have to be done on a case by base basis. Added text to explain this.		x
17	1	Appendix	M	LACFC	The equations presented are used to create goals for the whole region. They should be written including the actual values, to ensure the actual values used are accurate and up to date.	easy	These values are presented for informational purposes only and are not meant to represent actual values. Actual values will be dependent on project specifics.		x
18	2	Appendix	M	LACFC	From the way these equations and goals are used, there should be maps locating the areas where this infiltration should be taking place. These maps should be included in the appendix for review.	easy	These maps are presented in the body of the report a reference was added.		x
19	105	Appendix	N-1	Jan Dougall & Randal Orton, Las Virgenes MWD	IRWMP Habitat Project Score Sheet: Section 1 reads "project is consistent with adopted agency plans." Please clarify. Does this mean that the project is adopted in the GLAC IRWM Plan or does it mean that the project is consistent with plans from the agency responsible for the project?	easy	reworded		x

20	106	Appendix	N-1	Jan Dougall & Randal Orton, Las Virgenes MWD	It is unclear what someone would do with this draft form. Is the person filling it out supposed to circle their responses? If so, the form should have those directions. But if that is the case, where they would circle Yes (10 pts) or No (0 pts), can they also select values intermediate to 0 and 10? Some of the items would lend themselves to these kinds of intermediate responses. And at the bottom of page N-1 it says "Points." and "Score", but on other sheets it says "Points. Possible" and "Score" at the top. (I don't think there should be a period between Points and Score, either).	easy	Revised table for consistency	x
21	107	Appendix	N-1	Jan Dougall & Randal Orton, Las Virgenes MWD	In the very bottom row Score is misspelled as Socre.	easy	Corrected error	x
22	115	Appendix	N-10	Jan Dougall & Randal Orton, Las Virgenes MWD	Riparian/Riverine Wetland worksheet: Change "later" to "lateral" in the 2 nd and 3 rd options under Hydrologic Connectivity.	easy	Corrected error	x
23	116	Appendix	N-10	Jan Dougall & Randal Orton, Las Virgenes MWD	Riparian/Riverine Wetland worksheet, Physical Structure section: Why award more points for "a mixture of cobbles and boulders placed on each bench"? Boulder and cobble benches would only be expected along higher gradient streams. Cobbles and boulders would not be expected on benches of natural, low gradient streams. Upstream geology would also influence whether and to what extent cobbles and boulders on streams would be present downhill from shales, for example. Shales and sandstones generally won't produce as much cobble as granite or basalt. Cobble mining for landscaping is also energy consuming and damages one area for the benefit of another. It should be avoided where not merited.	easy	Revised language to reflect range of potential project settings.	?
24	117	Appendix	N-10 & N-11	Jan Dougall & Randal Orton, Las Virgenes MWD	This worksheet has a Wildlife Resource Value section, while previous sections do not. Perhaps a section like this could address the lacking measure of need mentioned in previous comments for other worksheets.	medium	Added	x
25	118	Appendix	N-11	Jan Dougall & Randal Orton, Las Virgenes MWD	Make corrections in the Floristic Resource Value section. The word "less" is applied to uncountable/non-discrete objects or mathematical comparisons (less water, less money, less than five percent of the total area) and "fewer" is the correct word to use with countable/discrete objects (fewer gallons, fewer dollars, fewer native plant species). http://grammar.quickanddirtytips.com/less-versus-fewer.aspx	easy	Corrected error	x
26	120	Appendix	N-14	Jan Dougall & Randal Orton, Las Virgenes MWD	The bottom section may be mislabeled. This section is labeled Wildlife Resource Value, but the same options in other worksheets have the header "Other."	easy	Corrected error	x
27	108	Appendix	N-3 & N-4	Jan Dougall & Randal Orton, Las Virgenes MWD	The term "overlapping structural diversity" needs to be defined. Is it the same as Floristic Resource Value on page N-11? Can it be defined somewhere with a page reference given here?	medium	Defined term	x
28	109	Appendix	N-3 & N-4	Jan Dougall & Randal Orton, Las Virgenes MWD	Wildlife Linkages scoring tool: We have read that "Caltrans has applied for a \$10 million federal grant to build a wildlife tunnel in Agoura Hills under the 101 at Liberty Canyon Road, says Francis Appiah, an associate environmental planner and natural scientist at the state agency. But the grant has yet to be approved." (http://zev.lacounty.gov/communities/mountain/deadly-passage-for-a-young-mountain-lion); http://www.dot.ca.gov/dist07/Publications/Inside7/story.php?id=558 As the Wildlife Linkages worksheet is currently structured, this project would receive a low score. It would get 0 pts for land acquisition, land protection and vegetation, with only 3 points for width, but more points in other categories. Yet it the single designated wildlife crossing between the Santa Monica Mountains and the Simi Hills. This form does not take needs and constraints into account.	hard	Agree though, this was the basis for the priorities. Inserted as recommendation	x
29	110	Appendix	N-5 & N-6	Jan Dougall & Randal Orton, Las Virgenes MWD	This Buffer Zone scoring worksheet seems to be lacking the same thing as the wildlife linkages worksheet – something to indicate the importance of the particular project relative to others simply by location or degree of need. Points should be awarded for level of need.	hard	Agree though, this was the basis for the priorities. Inventories were not included for this phase of the planning work. Inserted as a recommendation	x
30	112	Appendix	N-7	Jan Dougall & Randal Orton, Las Virgenes MWD	The Habitat Block worksheet is unclear. Habitat block is defined in the OSHARP, but there is no table of targets. Would this worksheet be used for acquisition, restoration, create linkages between, or what?	medium	All	x
31	111	Appendix	N-7 & N-8	Jan Dougall & Randal Orton, Las Virgenes MWD	This Habitat Block worksheet has the same limitation as described above. There is no measure of need. All else being equal, a species with 20 surviving members should rank with higher need than a species with 10,000 surviving members	medium	Agreed. No inventory was developed as part of this plan. Inserted as a recommendation.	x
32	113	Appendix	N-9 & N-10	Jan Dougall & Randal Orton, Las Virgenes MWD	Riparian/Riverine Wetland Systems Worksheet – comments made earlier on land acquisition and a measure of need apply to this worksheet, too.	hard	Agree though, this was the basis for the priorities. Inventories were not included for this phase of the planning work. Inserted as a recommendation	x
33	114	Appendix	N-9 & N-12	Jan Dougall & Randal Orton, Las Virgenes MWD	First cell – "Proposed project does not <u>negatively</u> impact any type of wetland system" or "Proposed project provides additional habitat benefits."	easy	Revised	x
34	119	Appendix	N-9-10 & N-12-13	Jan Dougall & Randal Orton, Las Virgenes MWD	Water Source/Supply & Hydroperiod - This section may not take all sources of hydromodification into account. Does it include reduced baseflow from increased impervious surfaces that reduce wet season infiltration? Does it include flashier flows from increased impervious surfaces? Would it include the effects of upstream dams, diversions and groundwater pumping? Would it include the influence of stream incision such that reaches historically dry in summer become perennial?	hard	Added to recommendations	x

35	104	Appendix	N-various	Jan Dougall & Randal Orton, Las Virgenes MWD	It appears that land acquisition can give a project points, even if the project scored 0 for "Proposed project will not provide any habitat benefits" and doesn't do anything else. Is this correct?	easy	Corrected error	x
36	77	OSHARP	1	Jan Dougall & Randal Orton, Las Virgenes MWD	Remove 6 th bullet. "Objective of the Plan" is not a subregion.	easy	Corrected error	x
37	121	OSHARP	1	Joyce Dillard, Public	"Natural open space systems provide habitat and recreation opportunities, as well as other important functions related to water supply, water quality, and other services including flood management and climate adaptation. As the region has grown, much of these natural systems have been lost or fragmented." Natural open space systems is a sneaky term for watersheds. So why don't you use that term. Open space systems infer development, so the premise is incorrect.	easy	Open space system is not synonymous with watershed.	x
38	122	OSHARP	1	Joyce Dillard, Public	"The goal of the planning process is to provide direction to reverse this trend by outlining a comprehensive regional framework for incorporating open space, both habitat and recreation, into water management project design features" This is not the goal. "Reversing this trend" is impossible in an urban environment hungry for the tax revenue that development generates. We also have state laws that validate housing stock. Here you need to include the term "preserve" natural open space as watershed management and flood control management. You incorporate recreation into watershed management but not into flood control management. Remember, we have a 200 year floodplain issue for safety purposes.	easy	Language revised	x
39	123	OSHARP	1	Joyce Dillard, Public	"The objective of the OSHARP planning process and report is to provide a framework for the GLAC Region's water and land managers to assist in the development of integrated projects for funding through the IRWMP." In reality, no land managers are involved such as the Planning Departments. With just water agencies, this plan lacks the understanding of those urban land designers to recognize watershed and the issues surrounding water management. We see this continually in environmental impact reports. Watershed management is just not addressed, especially with this regional focus. Adopted plans, by municipalities or by suppliers like Metropolitan Water District, are gospel for land use planning. May we remind you that Water Supply Assessments are given by water suppliers, who do not mention this plan. You are correct about funding through IRWMP. The Department of Water Resources needs to recognize that this plan has no teeth, outside their proposition funding.	medium	Comment Noted	x
40	125	OSHARP	2	Joyce Dillard, Public	"Open space encompasses a continuum of uses from natural resource lands to urban parks. The habitat continuum extends from upland areas to riparian and freshwater wetland areas to coastal tidal wetlands, while the recreation continuum extends from natural open space areas to greenways to park and urban recreation areas" The term "open space" is an urban planning definition, so you are using it properly in your context, but not in the intent of Watershed Management or of Flood Control Management. You are missing that part of Integrated Water Resource Management. Natural open space areas omit forests and streams and uplands in this context.	easy	Comment Noted	x
41	126	OSHARP	2	Joyce Dillard, Public	The continuum idea is flawed to begin with. What elements are working together—open space, open space habitat, recreation? What about the other elements required besides the Open Space Element such as: <ul style="list-style-type: none"> • Land Use • Conservation • Safety • Circulation • Noise • Housing and optional Elements: • Air Quality • Capital Improvements/Public Facilities • Community Design • Economic/Fiscal Development • Energy • Flood Management (NOTE THIS IS OPTIONAL) • Geothermal • Parks and Recreation • Water and recently added: • Greenhouse Gas Emissions Reduction and Climate Adaptation • Renewable Energy • Infill Development • Public Health • Regional Planning You need to refer to the Governor's Office of Planning and Research guidelines as codified. Those subregions are regional and not jurisdictional as to the General Plans. It is the incorporation into the General Plans that are critical. Otherwise, the time and money spent on this document is wasted.	medium	Comment Noted. Added recommendations	x
42	127	OSHARP	2	Joyce Dillard, Public	"In the foothill cities, open space is differentiated from developed urban parklands and focuses on natural, undeveloped lands that have been designated as environmentally and ecologically significant. On the other hand, for the more urbanized areas of Los Angeles County or cities that are built out and contain little or no undeveloped or undisturbed lands, open space emphasizes urban lands used for recreation. These lands include neighborhood and community parks, sports fields, school facilities, greenways, bikeways, green streets, medians, utility easements, etc." And where are the counties or unincorporated areas fitting as well as the Federal lands and tribal lands, if applicable. ASBS Areas of Significant Biological Significance are omitted.	medium	Comment Noted. The term "open space" is not jurisdictional.	x

43	128	OSHARP	2	Joyce Dillard, Public	<i>"The objectives of the Open Space and Habitat section of the Plan are to increase the number of viable wetlands within the region, to provide adequate buffers along aquatic systems, and to create wildlife linkages using riparian corridors and less densely populated hillsides."</i> Why so limited. This is an opportunity to address Sediment Management and Flood Control Management. Viable wetlands cannot increase because of the degradation of development of land and the ports. Wetland restoration has to be addressed intelligently and with thorough research. You completely ignore pollutants and TMDLs, which are so important in water quality issues and in the high cost of reduction. You also ignore Groundwater Recharge opportunity, on a natural basis and not created basis.	medium	Comment noted. These issues are covered under the other IRWMP objectives and should be incorporated with the OSHARP through integration.	x
44	131	OSHARP	4	Joyce Dillard, Public	<i>"Based on existing standards, there is a need for approximately 16,500 acres of additional urban parkland (neighborhood and community parks). In addition, there is a need for approximately 30,000 to 45,000 acres of additional regional park and open space lands for recreation."</i> Meaningless unless contrasted to availability.	medium	Inventories were not conducted as part of this project. Inserted as recommendation.	x
45	48	OSHARP	4	LACFCD	It is unclear what the "water related management practices" are that open space lands provide as a benefit to the region.	easy	Reworded	x
46	132	OSHARP	5	Joyce Dillard, Public	<i>"There are benefits to both surface and groundwater resource management that can be quantified using project-specific methodology. This methodology has been applied at the regional level using the assumption that the targets for habitat and recreation will be achieved. For example, there is an estimated potential to recharge an additional 28,000 acre feet of water per year on average throughout the GLAC Region if target habitat and recreation lands in areas with high recharge potential are developed or enhanced. As well, if the targets are met there is the potential to create 21,000 acre feet of storage for stormwater quality purposes if these open space lands are developed or enhanced with stormwater Best Management Practices (BMPs)."</i> This is not necessarily true. There are no Water Quality Standards and only guidance from the County that is extremely flawed for stormwater aka rainwater harvesting. LID Ordinances need to be taken into consideration as they offset stormwater and may not achieve the goals in areas of good groundwater recharge. BMP	medium	Comment noted	x
47	133	OSHARP	5	Joyce Dillard, Public	<i>"Climate benefits include carbon storage and sequestration by natural habitats; providing additional local recreation areas and green travel routes to encourage walking and cycling; and, creating habitat connectivity through wildlife linkages, corridors, and buffers."</i> Carbon sequestration varies by (vegetation or tree) species and this may not be the result. What are green travel routes. This is a new phrase.	easy	Reworded	x
48	134	OSHARP	6	Joyce Dillard, Public	<i>"Overall, one should be optimistic as challenges create opportunities. Judging from the level of participation throughout the development of the OSHARP, the support for open space and water resource management is comprised of a strong and vibrant network of committed public and private sector stakeholders."</i> And where is the public including but not exclusive to DACs.	medium	comment noted	x
49	135	OSHARP	7	Joyce Dillard, Public	<i>"The IRWMP incorporates the following objectives to identify water resource management issues, increase the region's ecosystem services, and meet future water supply needs...."</i> How about sediment management and stream restoration.	easy	These are project specific comments and should be covered by project proponents.	x
50	51	OSHARP	9	LACFCD	Figure 1 is labeled the Dominguez Channel Watershed when it should be labeled the Dominguez Watershed Management Area because it goes beyond the Dominguez Channel Watershed boundary.	easy	Corrected error	x
51	136	OSHARP	14	Joyce Dillard, Public	<i>"On the other hand, for the more urbanized areas of Los Angeles County or cities that are essentially built out and contain little or no undeveloped or undisturbed landscapes, such as Burbank, Gardena, or Compton, the expression of open space contained in their General Plans emphasizes urban lands used for recreation purposes. These lands include neighborhood and community parks and sports fields. Urban open spaces may even include public school facilities, greenways, bikeways, green streets and landscaped medians, open areas occupied by utilities such as flood control channels and utility easements, and private recreational facilities."</i> Don't confuse Open	medium	Comment noted	x
52	52	OSHARP	17	LACFCD	The first paragraph says that 95% of wetlands have been lost. This needs to be explained in more detail since there is no reference of what is being used as a baseline, when these losses started, and what they can be attributed to (i.e. massive urbanization of the entire region).	medium	Clarified	x
53	78	OSHARP	17	Shirley Birosik, CRWQCB – LA Region	Hyperlink at bottom of page doesn't work. It shows up elsewhere as well.	easy	Corrected error	x
54	79	OSHARP	19	Mary Zauner & Sharon Green, LACSD	Coast California gnatcatcher should be "Coastal"	easy	Corrected error	x
55	80	OSHARP	20	Shirley Birosik, CRWQCB – LA Region	Table 3: Should add southern steelhead trout to the list for North Santa Monica Bay. The National Marine Fisheries Services (NMFS), which has jurisdiction over anadromous species, designated critical habitat for the southern steelhead trout in 2005. See the NMFS Recovery Plan http://www.nmfs.noaa.gov/pr/recovery/plans.htm . Five drainages in the SM Mountains are highlighted in the plan for steelhead recovery.	medium	The *draft* of this plan is dated 2012. Not appropriate to include at this point in time. The IRWMP plan should be a living document, able to be modified as new information becomes available. Whether the plan is able to be updated or not depends on the availability of resources for updating.	x
56	140	OSHARP	21	Joyce Dillard, Public	<i>"The USACE has regulatory permit authority from Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act of 1899."</i> Section 408 of the CWA should also be mentioned.	medium	Section 408 applies to projects that alter harbor or river improvements, not natural systems.	x

57	81	OSHARP	21	Shirley Birosik, CRWQCB – LA Region	Figure 4: Reference as USFWS and NMFS Designated Critical Habitat Areas and add in streams from the recovery plan.		These maps were current as of the date that the original draft went out (added date to maps). Critical Hab Areas be updated with each plan update. The IRWM plan should be a living document, able to be modified as new information becomes available. Whether the plan is able to be updated or not depends on the availability of resources for updating.	x
58	141	OSHARP	22	Joyce Dillard, Public	"The regulatory program provides a preference for the use of mitigation banking to offset unavoidable impacts to jurisdictional areas (33 CFR 332 et seq.)." Please take into consideration the Tidelands Trust (state) and the wide jurisdiction (state) for Mitigation Banking. This would mean that other IRWM Plans would have to incorporate any Mitigation Banking offsets in this plan (Ports) and GLAC would have to include any Mitigation Banking offsets in other areas.		Comment noted. Mitigating impacts is a complex matter for project proponents which is best addressed on a project by project basis.	x
59	82	OSHARP	24	Jan Dougall & Randal Orton, Las Virgenes MWD	Remove the second comma in the first sentence of the last paragraph.	easy	Corrected error	x
60	83	OSHARP	24	Shirley Birosik, CRWQCB – LA Region	Hyperlink at bottom of page doesn't work. It shows up elsewhere as well.	same as 78	Corrected error	x
61	84	OSHARP	25	Jan Dougall & Randal Orton, Las Virgenes MWD	Remove the period after "et" in "et. seq." Et seq. is an abbreviation for et sequentia, meaning "and the following." "Et" is a complete word as is and is not an abbreviation needing a period.	easy	Corrected error	x
62	85	OSHARP	26	Shirley Birosik, CRWQCB – LA Region	Hyperlinks at bottom of page don't work.	same as 78	remove all hyperlinks. Make sure URL is correct or make it a general link	x
63	137	OSHARP	29	Joyce Dillard, Public	"There are many different ways to categorize or define wetlands, including approaches based on various ecological or regulatory perspectives. For this project, a wetland is considered to be land transitional between terrestrial and aquatic systems where the water table is usually at or near ground surface or the land is covered by shallow water. For purposes of this classification, wetlands must have one or more of the following three attributes:..." Now what entity voted on this decision. What public was allowed to comment on this decision.	medium	Please refer to Section 1.4 Significant Regional Planning Efforts	x
64	138	OSHARP	29	Joyce Dillard, Public	"This is an ecological definition of wetland, not the regulatory one. Therefore, an area identified as a wetland in this report is not necessarily considered a wetland for regulatory purposes. This may cause some confusion. For example, for the purposes of this report, man-made habitats are considered to be wetlands. However, the wetland regulatory definition considers some man-made habitats developed as stormwater Best Management Practices as a separate category. Man-made detention basins, swales, and depressional areas are generally not considered wetlands for regulatory purposes even though they may provide ecosystem benefits." This makes no sense. Why are you avoiding the regulatory definition in a State plan. Stormwater diversions aka Flood Control Channels are a separate category. Man-made detention areas, in any form, may be streets. How can you use your "man-made" definition.	medium	Clarified	x
65	86	OSHARP	30	Shirley Birosik, CRWQCB – LA Region	Second paragraph under "Terminology": Overall this paragraph is good but possibly should state with the 4 th sentence that "...many man-made habitats are considered to be wetlands."	easy	Clarified	x
66	139	OSHARP	31	Joyce Dillard, Public	"The restoration/creation habitat targets are based on the area of wetlands lost in each subregion. The historical extent of wetlands in the region (derived from Rairdan 1998; more detail about this data source is provided in Appendix A) is shown in Figure 6 (see Appendices G-K for subregional maps)." We cannot locate Rairdan yet you use him in this report. What is the name of his paper, where published. What is his entire name. Was the paper peer reviewed.	easy	Charles C. Rairdan. See references.	x
67	55	OSHARP	31	LACFCD	BMPs, flood control basins, and flood control channels should not be listed as current wetlands areas nor should they be considered as options for future placement of wetland areas.	hard	They were considered as wetlands because they provide some (albeit limited) habitat value. Future work should rank the value of different wetland types and use that to inform more refined targets. This was added to the recommendations section. No locations were proposed for future placements of wetland areas as part of this work	x
68	88	OSHARP	34	Jan Dougall & Randal Orton, Las Virgenes MWD	Table 4 is titled "New Wetland Habitat Targets" here and in the TOC. Please rename the table to "Wetland Habitat Targets (Acres)" as it was named in the previous draft. The current title "New Wetland Habitat Targets" is not as clear. The sentence below Table 4 says the "total wetland to be benefited" is 12,061 acres, but the values in the table don't support this. Please correct this sentence or add additional justification for this value.	easy	Corrected error	x
69	57	OSHARP	35	LACFCD	Table 4 should include the amount of existing type of wetland for each category in each sub-area.	medium	Inventories were not conducted. Inserted as recommendation	x
70	58	OSHARP	35	LACFCD	Table 4 does not clearly define where the "Greater Los Angeles County" is. If each sub-region is defined in the table, there should not be extra undefined area.	medium	Table condensed	x
71	59	OSHARP	36	LACFCD	The totals for the wetlands do not match the charts above or the total in the summary sentence.	easy	Corrected error	x
72	60	OSHARP	36	LACFCD	If the highest acreage is broken down by area more discussion should be included as to why that area was the highest. If not, there is no need to specify in the report, other than on the chart, which areas are highest for each category.	easy	Removed redundant section	x

73	62	OSHARP	39	LACFCD	Showing all rivers as linkages is problematic since maintenance crews are required to regularly maintain the area to ensure that adequate flood protection is achieved. This, by definition will not meet the linkage requirement. This same principle applies to any Flood facility listed as a linkage. In addition most rivers do not have the open space or room to create a 1000' buffer. These channels are developed almost up to their channel banks and removing this development would require relocation of a very large number of businesses and families.	hard	Added recommendation to refine linkages.	x	
74	63	OSHARP	40	LACFCD	Using the "potential" linkage as our target makes this goal very hard to achieve. There are many issues and problems that would need to be overcome before all the potential areas could become realized linkages. The goals set in this plan, while ambitious, still need to be achievable within the timeframe given.	hard	Comment noted	x	
75	64	OSHARP	42	LACFCD	Explain in better detail why the total acreage is being multiplied by 1.5 to determine the target acreage.		This was a simple multiplier that increased the mapped 36,000 acres to 54,000 accounting for uncertainty and with the understanding that 1,000 foot widths are minimums necessary to provide meaningful buffers and linkages. This multiplier was removed	We are waiting for SSI to respond to our email requesting a more in depth explanation. Short of that, would the HOSP Committee prefer we stick with the simple definition or should we remove the 1.5 multiplier and reduce the 54,000 acres to 36,000 acres?	x
76	89	OSHARP	45	Mary Zauner & Sharon Green, LACSD	Source should reference Section 5096.143	easy	Corrected error	x	
77	142	OSHARP	46	Joyce Dillard, Public	"Trail routes are illustrated on Figure 11 and were identified in the draft Los Angeles County 2035 General Plan." Trail routes also appear in Municipal General Plans and specifically Community Plans. Why were they not reviewed. The County does not have jurisdiction in incorporated or chartered cities.	hard	Trial systems are inconsistent across the region. See note at bottom of final paragraph on page 46.	x	
78	90	OSHARP	47	Jan Dougall & Randal Orton, Las Virgenes MWD	In Figure 11, we suspect the "proposed trails" layer is on top of and is obscuring the "existing trails." We have a Santa Monica Mountains trails map showing proposed trails where we know there are existing trails. Another possibility is that the legend labels for proposed and existing trails are reversed. Please check.	medium	- Yes proposed trails draw on top of existing and in some instances mask an existing trail. - proposed and existing trails have not been reversed. - Other layers (such as regional outlines) can mask a trail line. - There is no easy solution to this issue, given it is a result of showing large amounts of data on a small map.	x	
79	143	OSHARP	49	Joyce Dillard, Public	"The following describes some of the major types of recreational open space areas found in the GLAC Region." Cemeteries are open space.	easy	Although they provide opportunity, cemeteries were not considered as habitat or recreation for the purposes of this plan.	x	
80	91	OSHARP	51	Jan Dougall & Randal Orton, Las Virgenes MWD	Table 9 is incomplete. There are column and row headers, but none of the interior cells have been entered. It is also unclear what the units of those values will be. Since the table is labeled "existing and planned linear urban greenways..." we assume the unit will be linear miles, but that should be stated on the table.	easy	Table was meant to show presence/absence. Revised to make more clear.	x	
81	144	OSHARP	53	Joyce Dillard, Public	"A number of additional factors need to be considered during the process to implement these targets. These factors are largely based on the type of facility being developed." You did not address the relationship of land development and Quimby fees.	medium	Comment noted. There are too many factors to consider in a plan such as this to list them all and discuss them in their entirety.	x	
82	65	OSHARP	58	LACFCD	For low priority recreation areas see comment 3. Comment 3: Recreation Planning Targets should be to ensure no one is considered "underserved" and once that is achieved, the goal has been completed. The low priority areas should not be listed since they are considered adequately served.		While the low priority areas are shown on the map, they were not included in the methodology for setting the target. See Appendix D for this methodology.	x	
83	145	OSHARP	59	Joyce Dillard, Public	"Planned County trail routes" Is there not State trail routes and agency trail routes such as Rim of the Valley Trail.	medium	They were not incorporated into this plan.	x	
84	66	OSHARP	59	LACFCD	There is no explanation for the statement "5% of open space is usable". The standard for 6 acres/1000 people is in conflict with the beginning of the report which consistently stated 4 acres/1000 people.	medium	These are two different goals. This has been clarified. The 5% is based on best professional judgment of Patrick Miller, a recreation expert who has prepared numerous open space plans. Given the scope of this report, more detailed analysis was not possible. This was added to the recommendation section.	x	
85	67	OSHARP	59	LACFCD	If the description of need is broken down into urban parkland and open space then the chart should include this distinction as well.	medium	The distinction between urban parkland targets and passive rec targets has been made.	x	
86	68	OSHARP	59	LACFCD	The way in which the targets were calculated is confusing and hard to follow. Please explain this in more detail so it can be better analyzed.	medium	Clarified	x	
87	92	OSHARP	64	Shirley Birosik, CRWQCB – LA Region	Bottom paragraph: you might want to elaborate more on "designed" habitats. For instance treatment wetlands and the value they have as habitat even though they are primarily a water quality BMP. There's a paper by SCCWRP that really takes a close look at that. It's at ftp://ftp.sccwrp.org/pub/download/DOCUMENTS/TechnicalReports/388_habitat_value.pdf	medium	Added language and referenced Technical Report	x	
88	93	OSHARP	79	Shirley Birosik, CRWQCB – LA Region	Bottom of page: An additional reference with some interesting information on the topic is at https://www.estuaries.org/climate-change.html	easy	Added reference	x	
89	94	OSHARP	69	Mary Zauner & Sharon Green, LACSD	Last sentence, first paragraph should say "The methodology is described in detail in Appendix M, and the results are presented below."	easy	Corrected error	x	
90	69	OSHARP	71	LACFCD	Section 8.1 states the recharge goal as 47,000 ac-ft of recharge but here it says 57,000. There is no reasoning given for the extra 10,000 ac-ft of stormwater recharge.	easy	This is a water quality target, indicating the total capture capacity that may potentially be realized if the open space targets are met in a distributed fashion.	x	

91	95	OSHARP	80	Mary Zauner & Sharon Green, LACSD	The discrepancy between these sentences should be called out as a gap in knowledge discussion, which begins on page 88. "Although habitat and recreation targets were calculated separately using different methodological approaches, in fact they are related. However, they are not additive." vs. "...for the purpose of this plan, the total Open Space target is the sum of the habitat and recreation target values"	medium	Added recommendation.	x
92	70	OSHARP	81	LACFCO	The origin of the numbers in table 16 is not explained.	easy	Table updated and reference added	x
93	146	OSHARP	82	Joyce Dillard, Public	"Numerous methodologies for measuring biological or ecological integrity/ecosystem services were evaluated as part of the process for developing evaluation criteria for open space projects as they relate to habitat." Are you addressing salt water intrusion at all.	easy	No, saltwater intrusion was not included as part of this planning process.	x
94	147	OSHARP	83	Joyce Dillard, Public	"Recreation criteria may be applied on an individual project design basis, or on a broader general planning basis for land acquisition or comparative project evaluations" The Federal HUD Neighborhood Stabilization Program NSP has provided land for parks in low-income areas.	medium	Comment Noted	x
95	71	OSHARP	83	LACFCO	Each sub-region was supposed to come up with their own ranking criteria. If this is in the plan does that mean every sub-region needs to follow this metric and cannot make adjustments specific to their own sub-region?	medium	Added to recommendations	x
96	97	OSHARP	86	Mary Zauner & Sharon Green, LACSD	The plan says in several different places that "There is currently insufficient research on evaluating and assigning value to ecosystem services." The IRWM Guidelines require all projects to be evaluated using DWR's "Economic Analysis Guidebook", which includes a chapter on ecosystem valuation methods. How did that chapter factor into the conclusions reached?		DWR's "Economic Analysis Guidebook" discusses several methods for monetizing ecosystem benefits using a willingness to pay or transfer type approach. Per the guidebook, these methods may be applied to the human monetized ecosystem services such as water supply, water quality, etc. It does not provide methods for the non-monetized services such as genetic diversity, aesthetics, and intrinsic values.	x
97	72	OSHARP	88	LACFCO	Using private property (e.g. school fields) to help meet our goals can be feasible but should not be assumed feasible. Predicting or requiring certain uses of private parcels makes the goals potentially unachievable. This may require reduction of the open space goals.	hard	Comment noted	x
98	148	OSHARP	89	Joyce Dillard, Public	Draft The following recommendations for the OSHARP will assist in: <ul style="list-style-type: none"> • Incorporating new open space data and information in the IRWMP • Identifying and prioritizing important habitat and recreation needs • Refining targets, methodologies and project evaluation • Fostering regional partnerships. Comment Plans should be made to review Land Use designations in the Land Use Elements and calculate which regions of the Plan have greater opportunity in a Watershed perspective. Otherwise, fertilizing parks just produces pollutants and TMDLs. The municipalities of the water agencies represented should have their Planning Departments evaluate or interpret their approved plans for adaptation into this plan. Without involvement on a urban planning basis, this plan is mute.	hard	Added as recommendation.	x
99	99	OSHARP	95	Jan Dougall & Randal Orton, Las Virgenes MWD	Lilian in references should be spelled Lilien.	easy	Error corrected.	x
100	124	OSHARP	2-Jan	Joyce Dillard, Public	"This plan re-defines the habitat and recreation goals for the GLAC IRWMP, details more meaningful objectives for those goals, and quantifies measureable targets. A major benefit of this effort is this resulting standalone plan that, although developed for IRWMP, does not necessarily need to be applied solely to IRWMP. As other funding opportunities arise, the methods and criteria contained herein can easily be transferred to these other pursuits." Again, how can it be transferred. It is not incorporated in Conservation Elements of General Plans. HUD can use this to supplement infrastructure, but most in the water world do not understand the HUD Consolidated Plan nor do the Low-Income world such as Community Development Departments and Housing Departments understand the IRWMP world.	hard	Comment Noted	x
101	129	OSHARP	3-Feb	Joyce Dillard, Public	"In addition, the establishment of wildlife linkages, allowing species to migrate as conditions change, will help address the effects of climate change." Climate change, in the meetings we have intended, does not have to do with wildlife, so much as to carbon capture, extreme weather and sea-level rise. We cannot see how that address effects of climate change other than territorial adaptation due to habitat loss.	medium	comment noted	x

102	130	OSHARP	4-Mar	Joyce Dillard, Public	"While there are many opportunities for recreation in the region, the recreation demand exceeds the supply. Recreation ranges from highly structured parks and recreation sites within communities, to regional parks that may offer developed active and undeveloped passive uses, to natural habitat and wildlands that contain trail-related hiking, biking, and equestrian uses, as well as outdoor/environment education opportunities. Three general recreation objectives were established to guide targets..." Footnotes are missing as to how the criteria is established. Part of enhancement is more of a land use aspect and not water management planning. Again, will the bond money be used for this approach, or is this to set up additional funding from other bonds not covered by the Department of Water Resources. How do you plan to create this ideal acres/per population. Where is the density issue. As an area densifies, the allocation of lands per population is reduced. You may add open space, yet create lack of open space with increased density. Land Use Elements need to be reviewed for a reality check.	medium	we had to use census tracts, and population estimates for 2035	x
103	53	OSHARP	21 - 28	LACFCD	All of section 3.1, while containing useful information, does not really seem to provide any nexus to the plan itself or any goals contained within the plan. It should be removed.		The regulatory context section is included as information to assist those interested in implementing open space projects to understand jurisdiction, barriers, and potential methods on working with agencies.	x
104	54	OSHARP	29 Section 4.1	LACFCD	The first paragraph says we have lost significant wetlands. See comment 8.		Clarified.	x
105	56	OSHARP	33 - 34	LACFCD	Figures 6 and 7 should be larger to provide better clarity. Also see comment 11.	medium	Figures rotated	x
106	61	OSHARP	36 - 38	LACFCD	Suggesting/requesting/requiring vegetation habitat buffers next to waterways is problematic as it is in direct conflict with the Army Corps of Engineers if the waterway is leveed. The Corps will not allow vegetation on any portion of a levee.	medium	Comment Noted. This issue should be addressed on a project by project basis	x
107	49	OSHARP	5 1 st Paragraph	LACFCD	Infiltrating water with poor water quality may render ground water unsuitable for pumping by decreasing the water quality within the groundwater basin. Potential ground water infiltration should address this issue.	easy	Comment Noted. This issue should be addressed on a project by project basis	x
108	50	OSHARP	5 2 nd Paragraph	LACFCD	It is unclear how "creating habitat, connectivity through wildlife linkages, corridors, and buffers" provides a climate benefit.	medium	Through carbon sequestration, migration pathways	x
109	96	OSHARP	82, and Appendices L through O	Mary Zauner & Sharon Green, LACSD	Is including the recommended criteria to evaluate proposed uplands, wetlands and recreation projects in Appendices L through O appropriate, since this criteria is not being used in the process to evaluate projects that are included in the IRWM? Including these Appendices may be confusing to some stakeholders		They are important and may be incorporated into overall project evaluation in the future. Added language to make very clear that these criteria are not part of the IRWM project scoring criteria used through 2012.	x
110	98	OSHARP	89-91	Mary Zauner & Sharon Green, LACSD	The recommendations in the plan should be vetted by the subregional Steering Committees and the Leadership Committee as part of the process to finalize and adopt the IRWMP.	easy	Comment Noted	x
111	87	OSHARP	Figures 6-7, pages 32-33	Jan Dougall & Randal Orton, Las Virgenes MWD	Could the use of green and purple for current and historical wetlands get confused with the use of green and purple for Freshwater and Riverine wetlands? It seems that the common color scheme conflates current with freshwater wetlands and historical with riverine wetlands. Figure 6 is improved because instead of two colors it has three. But I would think the green-is-good coding could be extended to the "current" by making "current" another cool color instead of purple, which is closer to red-is-bad.	hard	There was much discussion on the colors to use for the various hydrology. We chose purple as logical extension of the blue/greens as a representation of "positive". These colors were also used on the benefits maps, meaning they also had to fit into that map set visually.	x
112	45	OSHARP	General Comment	LACFCD	Why are sections such as background/purpose, IRWMP areas, etc... included in this goal but not included in the Flood Management and Water Quality Goals sections?	hard	OSHARP is a new section of the IRWMP, whereas flood and water quality were simply updates	x
113	46	OSHARP	General Comment	LACFCD	Increasing the amount of vegetation, especially dense vegetation will require a large amount of water and some will most likely be drawn from the groundwater table. This could have an opposite effect from the rest of the projects within the IRWM Plan. On a small scale this may not have an impact however on large, region wide scales, this could have noticeable effects.	medium	Comment Noted. Project specific data needs to be addressed by project proponents	x
114	47	OSHARP	General Comment	LACFCD	Recreation Planning Targets should be to ensure no one is considered "underserved" and once that is achieved, the goal has been completed. The low priority areas should not be listed since they are considered adequately served.	hard	Low priority areas are not included in the targets for projected populations in 2035.	x
115	76a	OSHARP	General comment	Barbara Cameron	Include LA County Beach Sediment Report information: After a decade, the draft is published. It has tons of material and maps, exhibits including comments on ASBS and MPAs. I hope that some of it can be used in this subregion IRWM plan amendment. Coastal Sediment is a major climate change issue. It is not just the land based sediment discussion, it must be tied to sediment transport. Just looked it over briefly. Referenced Ambrose research, Dugan, Hubbard and Martin research, mapped plover boundaries and other offshore habitat mapping including MPAs, etc. I imagine that you could contact Susie Ming to see how much could be captured into the IRWMP amendment since it is in draft form. Hopefully, you could put a place holder in the event that it becomes final before the adoption of our IRWMP. The Coastal Sediment Management Workgroup (CSMW) along with the LA County Dept of Beaches and Harbors have made available the DRAFT Los Angeles County Regional Sediment Management Plan for comment/input. The draft report is available for download in pdf format from the California Coastal Sediment Management Workgroup web page at: http://www.dbw.ca.gov/csmw/pdf/LACO_CRSMW_DraftReport.pdf .	hard	Added recommendation	x

116	74	OSHARP	General comment	Mary Zauner & Sharon Green, LACSD	This effort needs to keep in perspective that habitat, open space & recreation planning is to be done in the context of integrated water resource management planning, and that, while multi-benefit projects can provide added value and benefits, habitat, open space & recreation objectives should not drive the IRWMP. A concern we have is that the OSHARP lays out an ambitious program that almost seems beyond the scope of the IRWMP. We need to ensure that there is a proper balancing of OSHARP with water resource management strategies. It might be preferable to have the OSHARP be a standalone document (adopted by someone else – not sure who that would be) that the IRWMP could reference. This topic should be discussed by the Leadership Committee, in our opinion.	hard	Comment Noted	x
117	75	OSHARP	General comment	Mary Zauner & Sharon Green, LACSD	Was an analysis done, to determine the cost or economic feasibility of achieving the objectives in the plan?	medium	No, that was not performed as part of this plan.	x
118	73	OSHARP	throughout	Jan Dougall & Randal Orton, Las Virgenes MWD	Citations are listed with a comma between the authors and year of publication prior to page 76, then without the comma for the rest of the document. Please select one style or the other.	easy	Error corrected.	x
119		OSHARP		Wendy La, Watermaster	There are a lot of questions relative to the water supply #s as well as the four groundwater basins' production #s. The map of the groundwater basins are incorrect as well as the methodology of choosing what to include as part of the water supply goals and objectives. These #s don't add up. Therefore, the #s in the Water Supply Objectives and Targets Tech Memo for our sub-region is incorrect as well	hard	The recharge values in OSHARP are theoretical and included for informational purposes only. Actual values need to be determined on a project by project basis.	x
120		OSHARP		Wendy La, Watermaster	HOSP plan identified over reaching goals and objectives without identifying who, what, when, where, and how much. The cities as well as other stakeholders had concerns relative to the methodology used in setting the Habitat, Open Space, and Recreation goals and objectives for our sub-regions. This blanket approach does not take into account of the potential impacts to the cities' existing business and residential communities/Land Uses. Questions relative to who is responsible for meeting these goals and objectives, where are the existing inventories showing what has been done so far, what about the gap analysis, how much will it cost to meet these goals and objectives and etc... need to be addressed. As part of the new IRWM guidelines, agencies/organizations will need to adopt the updated IRWMP, if they want their projects to be part of the IRWMP. The draft Habitat and Open Space Plan may conflict with the Cities' General Plan. This will create a barrier for the cities to participate in the IRWMP process. In turn, it will limit the cities ability to obtain project funding from the "50% WGA funding - Regional Project" portion of the County's proposed WQFI. Therefore, there must be an outreach effort to the cities, because they will be impacted	hard	Comment Noted	x
121		OSHARP		Wendy La, Watermaster	The HOSP's proposed maps showing the Los Angeles Flood Control District's facilities as wetlands is also a major concern for water agencies. Trying to address our concern simply by adding the words "not a regulatory requirement" is not enough to protect us from the unintended consequences, such as the regulators may adopt and use this plan	medium	These maps come from the NWIS dataset.	x
122		OSHARP		Wendy La, Watermaster	Please note the San Gabriel Valley gets 80%-90% of the water supply from its groundwater source. We rely on the Flood Control District to perform its Flood Management and Water Conservation duties as set forth in the Flood Control Act.	easy	Comment Noted	x