

Notes:

- The table below includes responses to comments from Consultation Committee members on the Initial Draft WQIP Update and the WQIP Update in general.
- All comments and final responses will be incorporated into a public comment response matrix that will be submitted with the Final WQIP Update in January 2021.
- Where indicated in the responses, the WQIP Update text was modified as described and changes incorporated into the Revised Draft WQIP Update document.

Table 1. Santa Margarita River Watershed Management Area Consultation Committee Comments on the Initial Draft WQIP Update. Written comments submitted October 16, 2020, and oral comment provided October 22, 2020.

Comment No.	Commenter	WQIP Section	Redline Page No.	Comment	Response Code A = Will Incorporate B = Continue Resolution N/A = Not Applicable	Response
Written Comments Received October 16, 2020						
1	Teri Biancardi	4.2.2.3.2 (as identified by commenter)	N/A	RCFCWCD should embark on producing a landscape scale analysis of the upper Santa Margarita River Watershed. An “opportunities map” could serve as the springboard for a much-needed regional planning effort. It could, for instance, identify zones where soil type would be particularly beneficial to aquifer recharge projects, such as the installation of beaver dam analogues. It could locate where there has been incision and erosion, property damage, and higher instances of pollution, where further education of residents on overwatering and watershed protection would be useful. (Residents could be encouraged to engage in land management and weed abatement strategies that minimize disturbance and favor applications of stormwater-absorbing mulch or compost. I understand there are strategies outlined in the public education strategic plan.) It could identify where streams could be restored, which benefits water quality. The map would identify where homeless congregate and illegal marijuana grows with the associated toxic pesticides such as carbofuran are used. A map of this sort would assist in “bang for the buck” calculations by helping to identify where investment would yield the highest return.	N/A, B	Noted. An opportunities map could support regional planning efforts including project prioritization and partnership identification. Section 4.3 of the WQIP describes the Watershed Management Area Analysis (WMAA) conducted for the Lower, Middle, and Upper SMR subwatersheds. The WMAA identifies important characteristics such as soils, hydrologic process categories, and stream descriptions, and also contains a list of candidate projects, which is updated through an adaptive management process and regional calls for projects, that could be used as alternative compliance options for Priority Development Projects (PDP). The WMAA provides a foundation to develop a fully comprehensive landscape-scale analysis of the watershed. The Copermittees will be evaluating the effectiveness of the Upper Santa Margarita River Watershed (USMRW) Storm Water Resources Plan (SWRP) in obtaining funding for future candidate projects. The SWRP is an integrated plan focusing on regional watershed-based stormwater priorities and on developing projects with multiple benefits. Should funding become available and participating agencies agree, a landscape-scale analysis and opportunities map will be considered for incorporation as a Watershed Management Area (WMA) Optional Strategy in a future WQIP update.
2	Teri Biancardi	4.2.2.3.2	N/A	The Alternative Compliance Program developed by the City of Temecula should be expanded to the County as a priority matter. This system has the virtuous circle of promoting sensible BMPs and healthy land and stream management and can also fund some of these projects.	N/A	Noted. During the current and past permit terms, the Copermittees had internal discussions on establishing alternative compliance approaches. Within the past two years, stakeholders in the WMA have been evaluating a possible credit trading program outside of the MS4 Permit implementation program and outside of the WQIP. In addition, the WMAA was updated in 2018 to include clear language to describe and enable a credit trading program once it is accepted by the Copermittees and approved by the San Diego Regional Water Quality Control Board (Regional Water Board). However, each governing jurisdiction within the SMR watershed operates differently, adding to the complexity of establishing a region-wide alternative compliance program or credit trading system that can be implemented on a consistent basis between jurisdictions. Per Permit Provision E.3.c.(3), each Copermittee has the discretion to allow Priority Development Projects (PDP) to participate in an alternative compliance program. As such, each Copermittee has been encouraged to move forward with developing jurisdiction-specific approaches that they deem appropriate for their respective areas.

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3	Teri Biancardi	4.2.2.3.2	N/A	There should be an active effort by RCFCWCD to reach out to cities to assist them with tracking dry season flows.	N/A	The District currently assists Copermittees in tracking dry-weather discharges in their respective jurisdictions. These efforts are presented in Table 4-11 of the WQIP. The District's IDDE assistance extends beyond providing training and reporting tools. The District assists the Copermittees by conducting outfall field screenings on a watershed-wide basis, ensuring that the Copermittees complete their respective jurisdictional outfall field screenings, conducting initial source-tracking follow-ups beyond the District's jurisdiction, and informing Copermittees of the analytical results from sampling events and findings from the initial tracking efforts. On many occasions, the District will also contact Copermittees to request outcomes from their own follow-up investigations.
4	Teri Biancardi	4.2.2.3.2	N/A	[There should be an active effort by RCFCWCD] to build stormwater projects that provide multiple benefits, for example flood protection AND improved water quality (concrete storm drains do the one but not the other).	N/A	District projects have consistently assessed the feasibility of including multi-beneficial elements in its designs. These elements range from installing off-line detention basins to maintaining native vegetation in natural channels. Currently, the District is planning a multi-benefit project in the City of Wildomar which is anticipated to redirect storm flows into a dual-purpose basin that will serve to mitigate flood waters during storm events and double as a public recreational field during dry weather.
5	Teri Biancardi	4.2.2.3.2	N/A	Actively track grant and funding opportunities that appeal to a variety of entities with revenue, and commit to adapting flood control and stormwater projects so as to attract those interests, such as recreation, habitat, wildlife corridors, aquifer recharge, carbon sequestration, water quality improvements, and climate and community resilience.	N/A	Noted. Several WMA and jurisdictional strategies detail efforts to identify and coordinate funding opportunities with a variety of stakeholders. Strategies include WMA Strategy 1, WMA Optional Strategy 5, and Riverside County's Optional Jurisdictional Strategy 12. These strategies are expected to be implemented as part of the SWRP.
6	Teri Biancardi	4.2.2.3.2 and Appendix 6		Establish a mechanism or process that could quantify water quality improvement projects on private lands, such as the Meadowview Stream Restoration project mentioned under the section Strategies and Coordination Related to Ecological Reserves	N/A	In 2019, the Regional Water Board accepted an updated version of the Water Quality Equivalency (WQE) Guidance Document for Region 9. This document describes the approved methodology for quantifying a project's water quality benefits and is referenced within the WMAA as a required tool for the implementation of candidate projects for Copermittees electing to adopt an alternative compliance program. Additional mechanisms are also available. The SWRP quantified the Meadowview Stream Restoration project's benefits through metrics that included: <ul style="list-style-type: none"> o Average annual load reduction of phosphorous (lb/yr) o Reduction in volume of potential flood water (AFY) o Area of habitat protected or improved (acres) <p>Depending on the reason for quantification, metrics or other quantification mechanisms may be used and will no doubt vary by project, plan, or program.</p>

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7	Teri Biancardi	4.2.2.3.2	44	Update Table A6-1 with candidate projects known, but not currently listed.	A	Noted. The current inventory reflects all known candidate projects. Projects that are not listed have not been brought to the attention of the Copermittees or have not met the criteria for a candidate project. It is important to note that Table A6-1 was developed to respond to a Regional Water Board request to create a specific inventory of Ecological Reserves (ERs), as defined by the Regional Water Board, and evaluate whether the State's ER goals and objectives are consistent with the WQIP. This inventory is updated at least every five years or as needed to reflect newly proposed ER projects as they become known to the Copermittees, meet candidate project criteria, and fit the Regional Water Board's definition of Ecological Reserves.
8	Teri Biancardi	4.2.2.3.2	N/A	Build collaborative partnerships around water quality and water supply with diverse, grassroots entities currently active in the watershed, such as resource conservation districts, NGO's, agencies, and community interests.	N/A	Agreed. During the current permit term, the Copermittees had internal discussions regarding partnerships with local and regional stakeholder agencies, districts, organizations, and groups. As a result, each Copermittee is establishing contacts with these entities according to the jurisdiction in which they operate. In addition, the WQIP includes District strategies, such as WMA-7, WMA-8, and WMA-9, that focus on collaboration and partnerships. These strategies are currently being implemented with the entities identified in these strategies which include all of the participants of the SMR Nutrient Initiative Group, SMR IRWM Group, and the WQIP Consultation Committee.
9	Teri Biancardi	4.2.2.3.2	N/A	Incorporate a strategy to require the consideration of the best environmental alternative in the construction of all stormwater facilities. Principles of engineering with nature and incorporating bioengineering wherever possible should become routine. (More on this can be found at this Army Corps website: https://ewn.el.erdc.dren.mil).	N/A	Noted. District Strategy DEV-2 details the District's efforts to continue updating BMP specifications for use in project plans where conditions allow. These efforts also include encouraging nature-based features and low impact development such as biofiltration, pervious systems, and minimization of structural footprints during the project planning process. In addition, stormwater facility projects are subject to CEQA's alternatives analysis requirements. This analysis must consider feasible alternatives or mitigation measures that lessen environmental impacts. Furthermore, permits and regulatory agency approvals are typically required for the construction of stormwater facilities. Project proponents must identify impact avoidance and mitigation measures in permit applications for several permit types including the State Water Resources Control Board 401 permit.
10	Teri Biancardi	N/A	N/A	Now a comment for the SDRWQCB. It would greatly assist the overall goal of improved water quality if the board would assign a benefit to the Permittees and Co-permittees for supporting stream restoration and preservation projects, as we know that wetlands serve as nature's wastewater treatment plants. The Water Board should develop clear metrics to incentivize bio-engineered structural restoration projects. In other words, add some carrot to the stick.	N/A	Comment noted.

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11	Teri Biancardi	N/A	N/A	Overall, I would like to see a wider recognition and proactive outreach effort that communicates stormwater is not just a nuisance, but is an essential resource, and has an important role to play in water supply, enhancing local sustainability and climate and community resilience.	N/A	Agreed. The District is striving to communicate watershed-wide awareness of the MS4 Permit and the benefits of stormwater. Copermittee and WMA strategies related to education include “ongoing” or “continuous” implementation frequencies to allow for adaptive management, a review of the effectiveness of these strategies, and implementation of adaptive messaging over time. As an example, the updated rcwatersheds.org website includes educational materials addressing water as a “precious and expensive resource” and includes updated educational materials including those specifically targeted for youth that refer to the pollution in stormwater runoff as an issue. Additionally, the County of San Diego works with regional partners, including the San Diego County Water Authority, to encourage climate and community resiliency through collaborative incentives and educational programs. The purpose of these multi-faceted programs throughout the WMA is to reduce overwatering, encourage native-friendly landscaping and promote the onsite use of stormwater.
12	Jonathan Snapp-Cook	4.2.1.3.2	20	This section says that Copermittees could coordinate with Water Districts. Add some reasons that water districts and Copermittees would coordinate or participate in projects. Language discussing the benefits to both the Copermittees and water districts would be helpful here. It would give both Copermittees and the water districts some justifications related to shared goals or efforts to improve water quality that could be a base for coordination.	A	Agreed. Text has been modified to discuss potential benefits of Copermittee coordination with water districts. The following text was added: Reducing dry weather flows and collaborating in water conservation efforts can contribute to the reduction in target pollutants. Leveraging Copermittee resources with water district resources to achieve common goals such as pollution prevention and water conservation may increase efficiency and reduce costs for both the Copermittees and water districts.
13	Jonathan Snapp-Cook	4.2.2.3.6	N/A	Please add a reference to Appendix 6 in this section. It is important that the concepts in this section are related to the list of projects listed in Appendix 6.	A	Agreed. Text has been modified to reference Appendix 6. The following text was added: Future stream restoration projects may be located on ERs within the WMA and a description of known stream restoration projects on ERs is included in Appendix 6 .
14	Jonathan Snapp-Cook	4.2.3	N/A	Please add a reference to Appendix 6 in this section. The list of “Collaborative WMA Strategies for the SMR WMA” relate to the information listed in Appendix 6, so potentially a reference to the Appendix would be helpful.	A	Agreed. Text has been modified to reference Appendix 6. The following text was added: A list of these can also be found in Appendix 6.
15	Jonathan Snapp-Cook	N/A	44	This appendix needs an additional section to address beneficial projects being done that are not on Ecological Reserves. Potentially, the other section could be called “Strategies and Coordination Related to Voluntary Watershed Projects” or “Strategies on All lands that employ bio-engineering and natural conditions to improve water quality” (I think it relates to sections 4.2.2.3.6 and Table 4-16 in the WQIP). Specifically, in Table A6-1 the project at Meadowview is listed and Meadowview is not an Ecological Reserve. This project is beneficial, but it is taking place on private land that is part of an HOA. It seems like these projects can also be	A, N/A	Noted. A footnote has been added to the existing table to identify voluntary projects and/or private lands. The footnote reads as follows: The Meadowview project is not an Ecological Reserve as described, it is not conducted by an agency and is a voluntary project supported by local and federal funding.

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				done on private lands that are not Ecological Reserves. How can this be defined or separated out?		
16	Jonathan Snapp-Cook	N/A	45	Table A6-1 mixes two types of information. It lists the Ecological Reserves and how they relate to the plan, but it also includes actual project information. Break this into two tables. A6-1 Ecological Reserve Inventory and another table for “Ecological Projects Occurring in plan that assist WQIP Goals”. Take the “projects” out of table A6-1 and put them in a separate table. The issue here is that as it is the table mixes Reserves and Projects. The Reserves are a static piece of information and the project list is dynamic. The project list would need to be updated overtime as projects finish and new projects start.	A, N/A	Agreed. Text has been modified to clarify. While some ERs have specific ongoing or past projects referenced in Table A6-1, other ER goals are based on long-term management objectives rather than projects. As active projects are completed within an ER, goals may shift to long-term maintenance and monitoring. The table will be updated as needed as part of WQIP adaptive management. The modified text reads as follows: As new ERs are added and projects are implemented, the ER inventory table will be updated as part of the WQIP adaptive management process.
17	Jonathan Snapp-Cook	N/A	46	Table A6-2 – This table needs an introduction in the text. It is not clear what this table refers to or where it connects to in the text of the main document.	A	Agreed. Text has been modified to include an introduction for Table A6-2 that references the connections to the main body of the WQIP. The following text was added: The Copermittees have identified a number of jurisdictional, optional, and Watershed Management Area strategies that involve coordination with or leveraging resources of water and/or sewer agencies within the watershed management area to conserve water, prevent pollution, and improve water quality. Some strategies are partially implemented by the City of Temecula, County of Riverside, the District, and the City of Murrieta. San Diego County has fully implemented a strategy, IDDE-8, which includes coordination with upstream entities such as sewer/water agencies. Table A6-2 below summarizes these strategies. WQIP Section 4.2.1.3.2 further describes the existing and potential added benefits of water and sewer agencies coordination. WQIP Figure 4-12 identifies the geographic boundaries of each water district within the watershed.
18	Jonathan Snapp-Cook	N/A	N/A	What is the process for voluntary stream restoration projects to be listed in the plan? Is it possible to have a more structured approach to voluntary projects that benefit water quality in the watershed? Something like the Southern California Wetlands Recovery Project (https://scwrp.org/work-plan/). It seems like a coordinated effort with a list of desirable project types or accomplishments tied to the measurable pollutants in the WQIP could be beneficial. Also, developing a list of grant or funding opportunities could be helpful to landowners and organizations wanting to do beneficial and voluntary projects.	N/A	Voluntary stream restoration projects can be included in the WMAA as candidate projects, and the District will add any identified voluntary projects in the existing list of candidate projects in the WMAA. Voluntary projects should also be submitted to the appropriate IRWM (Upper SMR IRWM and/or San Diego County IRWM). A list of grant or funding opportunities would be useful for stakeholders; however, we will need to evaluate to what extent this information can be included in the WQIP. Since grant programs and funding sources are dynamic, a frequently maintained web-based resource may be preferable—some information is maintained by the IRWMs and there are funding resources on the web (CASQA, USEPA Water Finance Clearinghouse, etc.).

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19	Jonathan Snapp-Cook	N/A	N/A	The bio-objectives are being discussed but we should acknowledge this and review to see where it stands with water quality.	A	<p>Agreed. Text has been modified. Bioassessments are conducted annually in the watershed. On behalf of the Copermittees, the District conducts bioassessment sampling as part of the WQIP monitoring program and in coordination with the SMC Regional Bioassessment Program. The results are evaluated as part of the WQIP Monitoring and Assessment Program and described in Chapter 5 of the WQIP. Once the biological objectives are adopted and the schedule for implementation is known, the Copermittees will evaluate the WQIP to ensure that the WQIP's current goals, strategies, schedules, and/or monitoring and assessment program are consistent with the goals of the biological objectives or if revisions are required.</p> <p>The text modifications are as follows: Other examples of regulatory drivers that may trigger modifications include new state policies or plans and changes resulting from modifications to existing Permit requirements (e.g., as a result of revising a TMDL). An updated Permit, a proposed Biological Objectives Basin Plan Amendment, and a SMR Mainstem TMDL Alternative are regulatory actions expected in the near-term. When adopted, these actions are expected to trigger new modifications to the WQIP. WQIP updates related to these actions will be conducted as part of the adaptive management process related to New Information as described in Section 6.4.</p>
Oral Comments Provided During the Consultation Committee Meeting October 22, 2020						
20	Pablo Bryant	N/A	N/A	From boots on the ground management, reducing the amount of trash, refuse that is accumulating in and above the confluence of the Santa Margarita River. The upper stem but in the lower part of the watershed. That's the big concern for me.	N/A	Comment noted. Trash is identified as a Priority Water Quality Condition in the Middle SMR Subwatershed and Fallbrook Creek. Multiple jurisdictional strategies target trash reduction and elimination. Strategies related to trash reduction within the WQIP include trash capture, litter abatement, and addressing trash from homeless encampments.
21	Erica Ryan	Chapter 6	N/A	Two significant actions or procedures moving forward that aren't necessarily finalized yet but they may have an impact. I don't know where they might be housed but would think that they would need to be recognized in this plan. One of them is the Bio Objectives that are being discussed. Maybe we should acknowledge that it will need to be looked at and where it stands with the Priority Water Quality Conditions processes and procedures. Maybe it goes into B.5? Just want to make sure we don't forget about that. The second has to do with the SMR TMDL and I didn't see how we were treating that. These two are sort of absent in the update and so I just wanted to at least put up as bullet points or how the plan will be adaptively managed if the outcomes go in the most likely direction.	A	<p>Agreed. Text has been modified to update references to Biological Objectives and the SMR TMDL.</p> <p>The text modifications are as follows: Other examples of regulatory drivers that may trigger modifications include new state policies or plans and changes resulting from modifications to existing Permit requirements (e.g., as a result of revising a TMDL). An updated Permit, a proposed Biological Objectives Basin Plan Amendment, and a SMR Mainstem TMDL Alternative are regulatory actions expected in the near-term. When adopted, these actions are expected to trigger new modifications to the WQIP. WQIP updates related to these actions will be conducted as part of the adaptive management process related to New Information as described in Section 6.4.</p> <p>The SMR Copermittees fully intend on revisiting the WQIP upon adoption of new, or changes to existing, regulations to ensure that the current goals, strategies, schedules, and/or monitoring and assessment program are consistent with the goals of each new or revised, regulation. WQIP Tables 6-1, 6-4, and 6-5 detail adaptive management triggers</p>

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						for “New Information B.5.b” to update the WQIP goals, strategies, schedules, and the monitoring and assessment program as needed based on regulatory changes.
22	Erica Ryan	Chapter 6	N/A	Perhaps a trigger point for adaptive management to be evaluated – e.g., when the objective gets adopted or TMDL is finalized.	A	Noted. See response to Comment 21.
23	Erica Ryan	Chapters 4 & 6	N/A	There is no mitigation bank in the Watershed Management Area and we have been approached by quite a few applicants. Where it has impact is the ability for Priority Development Projects to mitigate offsite for the Provision E.3. requirements. That might also be something that we look at.	B	Noted. During the current and past permit terms, the Copermittees had internal discussions on establishing alternative compliance approaches such as a mitigation bank. Within the past two years, stakeholders in the WMA have been evaluating a possible credit trading program outside of the MS4 Permit implementation program and outside of the WQIP. In addition, the WMAA was updated in 2018 to include clear language to describe and enable a credit trading program once it is accepted by the Copermittees and approved by the Regional Water Board. However, each governing jurisdiction within the SMR watershed operates differently, adding to the complexity of establishing a region-wide alternative compliance program or credit trading system that can be implemented on a somewhat consistent basis between jurisdictions. Per Permit Provision E.3.c.(3), each Copermittee has the discretion to allow Priority Development Projects (PDP) to participate in an alternative compliance program. As such, each Copermittee has been encouraged to move forward with developing jurisdiction-specific approaches that they deem appropriate for their respective areas.
24	Erica Ryan	Chapter 6	N/A	How the Riverside MSHCP fits in the adaptive management trigger, I didn’t see it and it is directly tied to one of the topics, how it would directly link to the mitigation plan. I think the goals and objectives of the overall MSHCP needs to be a little touched on. They are relevant to the overall goal of the IO and SMR TMDL.	A	Agreed. Text has been modified to refer to the Western Riverside County Regional Conservation Authority (RCA), the Riverside County MSHCP, and the San Diego County Multiple Species Conservation Program (MSCP) in Appendix 6 and the District will review the Riverside County MSHCP during future updates to the WQIP. The following text was added: In addition to these and other named reserves, the Regional Conservation Authority of Riverside County has identified critical conservation areas and core criteria cells to target for future land acquisition as part of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). In San Diego County, key conservation corridors and conserved lands are identified as part of Multiple Species Conservation Program (MSCP).