

APPENDIX E

**CONSULTANT RESPONSES TO COMMENTS
ON THE
DRAFT WATERSHED MANAGEMENT PLAN
(DATED NOVEMBER 2004)**

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SDRWQCB
Draft Santa Margarita Watershed Management Plan – Comments

1. The second paragraph on page 9 discusses that California Unified Watershed Assessment. It would be helpful to reference a source for this, or the name of the agency that conducted the assessment.

ANCHOR -- Citation to NRCS provided

2. Page 12 – It would be helpful to describe what the “state monitoring list” is and how it relates to the 303(d) list. For example, “The state monitoring list identifies various constituents of potential concern in addition to the impairments listed on the Final 2002 Clean Water Act Section 303(d) list. Constituents on the monitoring list were not included on the 303(d) list because available data was not adequate and more information is needed to determine whether water quality standards are being met.”

ANCHOR -- Comment added

3. Page 12 – The discussion on the Temecula-Murrieta Management Area should mention that data from the NPDES MS4 monitoring data (collected since 1993) shows various consistent exceedances of water quality objectives for urban runoff-related (including but not limited to: MBAS, nitrogen, phosphorus, fecal coliform, chromium, pH, chlropyrifos and diazinon), indicating additional concerns.

It’s fine to mention some of the stakeholders’ concern about the nitrogen and phosphorus standard, but it should be mentioned that they have no water quality data to back up their concern. In fact, the Riverside MS4 Permittees’ *Analysis of Receiving Water Quality within the Santa Margarita Watershed*, submitted to the SDRWQCB on December 6, 2002, states that “Many of the Total Phosphorus concentrations were measured at or below the Basin Plan objective (0.1 mg/l).” This information indicates that the Basin Plan objective for phosphorus is not set lower than background conditions.

ANCHOR -- Added list of exceedences; added reiteration that lack of data re background levels and sources of P and N contribute to on-going debate

4. Page 27 – The fourth sentence in Section 3.1 refers to the “up-watershed”. Assume this should be “upper-watershed.”

ANCHOR – Text change made as requested.

5. Page 28 – Section 3.1.2 *Hydromodification* does not mention channelization, bank hardening, undergrounding streams, or any other forms of hydromodification other than erosion. These other hydromodification activities, which are common in the upper Santa Margarita watershed should be discussed.

ANCHOR -- We do mention some of these, and have added the rest of them mentioned here

6. Page 29 – Section 3.2.1.2 *Beneficial Uses and Regulatory Requirements* is unfinished. Since it is cut off mid-sentence, it’s not evident what the section will include, but it should include an accurate description of Basin Plan standards and

their purpose. It's also important to note the point made above in Comment No. 3, which is that the concerned stakeholders have not provided any data or documentation supporting their concern about the Basin Plan standards.

ANCHOR -- "The stakeholders are concerned that they are expending resources to comply with these standards without the benefit of evaluating whether the standards ... are appropriate given background levels. As discussed in the Watershed Analysis, the Basin Plan has set regulatory standards for each constituent. These standards are intended to protect the beneficial uses as defined by the SDRWQCB. Some stakeholders disagree with the regulatory requirements and whether the beneficial uses are impaired, but they do not have empirical data supporting this position."

7. Page 30 – Third paragraph in the Temecula-Murrieta Management Area uses "availability data." This should be "available data."

ANCHOR – Text change made as requested.

8. Page 37 – The fourth bullet under Contributing Elements refers to catch basins as a flood control measure. Catch basins in storm drain inlets do not typically provide for flood control. Detention or retention basins would be more applicable in this section.

ANCHOR -- This was added at the request of another stakeholder. [This text was inadvertently removed and has been reinstated in the document.]

An additional bullet stating "Continued development in the flood plain" should be added to this section.

KTUA/EVEREST -- We cannot agree completely with this comment due to variations in the definition of the word "floodplain." For example, development in the floodplain could mean habitat restoration within the regulatory floodplain and that type of development within that floodplain would not necessarily constitute a contributing element for flooding. We believe the intent of this comment is adequately covered through the series of proposed action recommendations.

9. Page 38 – The fourth bullet under Early Action Recommendations also refers to "catch basins" as a flood control measure. Again, detention or retention basins would be more applicable.

ANCHOR -- This was added at the request of another stakeholder. [This text was inadvertently removed and has been reinstated in the document.]

The last bullet should include encouraging the use of Low Impact Development techniques that reduce impervious surfaces and help maintain pre-development hydrology on new developments.

KTUA/EVEREST -- We disagree with this comment since inclusion of this text would indicate acceptance by all stakeholders for this proposed recommendation. This might and probably would fall out as a recommendation of the proposed recommendation we have provided for the development and implementation of a watershed-wide impervious surface plan. This recommendation could be extended or another proposed that would call for the development and implementation of a watershed-wide low impact development plan for ultimate approval by the stakeholders.

10. Page 39 – Section 4.1.2 Hydromodification states that it is impossible to define the significance of hydromodification impacts because the level of hydromodification is unknown. The SDRWQCB does not agree with this statement and encourages you to improve this section. Various sources documenting the impacts that have occurred from hydromodification in the Santa Margarita watershed exist, including the *Draft Operational Guidebook for Reference Based Assessment of the Functions of Riverine Waters/Wetlands in the Santa Margarita Watershed, Riverside and San Diego Counties, California*, March 2004; and *Assessment of the Cumulative Impacts of Section 404 Clean Water Act Permitting on the Ecology of the Santa Margarita, CA Watershed*, Eric Stein 1995. For example, the Guidebook states the following evidence of significant impacts from hydromodification activities in the watershed:

- Stream channelization and other types of hydrologic modifications have resulted in the cumulative loss and degradation of riverine waters/wetlands in the watershed.
- Many fourth order streams have been routed through hardened trapezoidal channels that are often constructed for the purposes of flood conveyance. When compared to reference standard conditions, these stream reaches no longer have significant hydrologic complexity or vegetative community structure, nor do they perform hydrologic functions such as surface and ground water storage and exchange, sediment mobilization, transport and deposition, and surface water flow.
- Murrieta Creek and Temecula Creek have been constrained by levees, rip-rap, roads, bridges, and culverts along some if not most of their lengths. When compared to reference standard conditions, the channel cross-sectional, longitudinal geometries, sinuosity, and width:depth ratio is significantly altered. During storm events, stream energy and stored materials (e.g., sediment, debris) accreted within the stream channels are conveyed to downstream reaches, including the main stem of the Santa Margarita River and its estuary.

ANCHOR – The Study Team did not include reference to the Draft Operational Guidebook referenced by the Regional Board, as this is not a published document. Based on additional comments from the Regional Board, this language has been included in the Plan. Regarding the Stein 1995 document, this information would have been more timely given at the time of creating the Watershed Analysis, when the Study Team requested any and all data, research, and other information that the stakeholders had in their possession or had knowledge of. Therefore, the information requested by the Regional Board has not been included in this Plan, but the Study Team encourages those who wish to learn more about hydromodification in the Santa Margarita River Watershed review this document.

Further, all new developments in the watershed that require a Section 401 Water Quality Certification involve some type of hydromodification. In many cases, the Riverside County Flood Control and Water Conservation District (District) requires channelization of streams on the new development site to accommodate 100-year flood flows. These typical District flood control requirements should be discussed in this section, and should be listed as a Contributing Element. Also, the Murrieta Creek

Flood Control Project, which involves channelization of 7 miles of Murrieta Creek should be mentioned in this section.

KTUA/EVEREST – As mentioned above, this comment would have been more appropriate for the Assessment, when the Study Team was gathering baseline information upon which to build the Plan. There was information available for bridges and roads throughout the watershed; however, there was no available information/data for the levees, rip-rap, and culverts referred to above. Does the reviewer have a database (GIS, spreadsheet, maps, etc.) with the information/data referred to above? If so, this could be included in the subsequent version of the WMP. There is no information/data on the number, length, type, or area coverage for hydromodifications throughout the watershed, along with associated effects (e.g., knick point formation, downcutting, degradation, aggradation, etc.).

11. Page 39 – The third bullet under Contributing Elements references a lack of regulatory control to limit hydromodification. The Regional Board’s Section 401 Water Quality Certification and the U.S. Army Corps of Engineers’ Section 404 programs are regulatory controls that can limit hydromodification. These programs should be mentioned. One of the main challenges these regulatory programs face is the District’s flood control requirements.

KTUA/EVEREST -- Replace third bullet with “Conflicts between the regulations set forth in the Clean Water Act Sections 401 and 404 and the local flood control districts’ requirements”

12. Page 40 – Section 4.2.1. Surface Water Quality should include a brief description of the history and results of the NPDES MS4 monitoring, since it is probably the largest source of surface water quality data in the watershed.

ANCHOR -- Reference made to Assessment; reference made to NPDES monitoring

13. Page 41 – The Early Action Recommendations section should include the utilization of MS4 monitoring data to identify sources of pollutants and target areas for management actions.

ANCHOR – Comment noted. The stakeholders have not come to consensus with this recommendation at this time.

14. Page 44 – As discussed in Comment Nos. 3 and 6 above, the Permittees have not provided any data or documentation supporting their concerns about the Basin Plan standards. In fact, a report submitted in December 2002 states that the standards are achievable. The last sentence of this section should be deleted or modified because, due to the lack of supporting documentation, the Regional Board has not been attempting to “resolve” the issue and currently supports the existing standards as appropriate.

ANCHOR -- – Text change made as requested.

15. Page 44 – The first bullet under Contributing Elements states “lack of trust between local and state governmental agencies” as contributing to the problem. “Lack of agreement” may be more appropriate. As written, it sounds as if the Regional Board

does not trust the Permittees, which is not accurate and may lead to additional problems.

ANCHOR – Text change made as requested.

16. Page 58 – The second line under Summary of Problem uses “negative affects”. This should be “negative effects.”

ANCHOR -- Text change made as requested.

17. Page 59 – The third bullet under Early Action Recommendations should include the implementation of Low Impact Development techniques.

ANCHOR -- Text change made as requested.

18. Page 60 – The state’s Surface Water Ambient Monitoring Program (SWAMP) should be discussed in the Data Management section. SWAMP’s goals include achieving consistent data collection and quality assurance procedures among state and local monitoring programs. A SWAMP Information Management System will be used to input data from all sources. The Regional Board is now requiring SWAMP quality assurance procedures to be used in all new MS4 monitoring programs (including the new permit for the Santa Margarita Watershed).

KTUA -- Please edit second Early Action as follows:

Adopt a “standard” monitoring design that is compatible with other federal, state, and local programs, such as the state’s Surface Water Ambient Monitoring Program (SWAMP), for the SMRW that will alert planners and managers to water quality threats in the watershed. This will involve developing a list of key questions by watershed partners and appropriate sampling designs to answer those questions. Key participants should include researchers with expertise in sampling design and watershed processes, regional planners, land managers, regional water quality control board, and others. Monitoring sites will include both sites where automated monitoring stations can be used and those where only hand samples will be adequate to measure some variables

19. Table 5-1 – An implementation schedule with specific time frames for actions is definitely appropriate for a watershed management plan. Because this plan is unique in that a watershed council has not yet been established, perhaps the column should be titled “Potential Time Frames” in case the formation of a council and obtaining necessary funding takes longer than anticipated.

ANCHOR

Table to be re-worked. Revised matrix to show, by major action, the early action recommendations first, followed by the long-term recommendations. Duplicates or repetitive actions will be edited.

City of Temecula
COMMENTS ON THE DRAFT WATERSHED MANAGEMENT PLAN
(December 2004)

1. Page 1, second paragraph. In the first sentence please replace the word “explosive” with “rapid”. It is more accurate and more descriptive.

ANCHOR -- Text change made as requested.

2. Page 4, Section 1.3.2, second sentence. Revise the second sentence to read as follows: “Matrix 1-1 shows the issues of concerns relative to the specific management areas; this matrix also shows whether the stakeholders considered these issues to be a major or minor concern and whether the condition is an actual problem or simply a lack of sufficient information to define a concern.”

ANCHOR

... are actual problems or if a lack of sufficient data is the concern. Stakeholders did not always agree on whether there is sufficient information to determine if a specific issues was a wide-spread problem, however, all concerns raised by stakeholders, as vested contributors to the WMP, were included on Matrix B-1. After on-going discussions with the stakeholders, based on technical data generated by the Study Team and on the general agreement of the stakeholders, Table 1-1 was subsequently developed by the Study Team. Where both a data gap and physical issue are identified on Table 1-1, this indicates that there was general agreement on a lack of data as the primary concern and that a specific problem was identified by a stakeholder.

3. Page 4, Section 1.3.2. To the end of this paragraph add the following sentence: “In most cases, where both a physical issue and data gap are identified, the primary concern is the lack of information needed to make any kind of informed determination.”

ANCHOR -- See above

4. Page 5, Table 1-1.

1. Reducing dependence of imported water is probably not a problem in a subbasin that is almost entirely a reservoir for imported water. The presence of state and nationwide water issues should not be listed as a local problem in this document unless it has a noticeable local manifestation.

ANCHOR – Reducing dependence on imported water is a stated goal of the watershed plan; the Study Team was requested to identify as many areas of future projects as possible in the WMP and this was included to cover future projects; also, this subject was of great interest to other stakeholders.

2. Flooding should not be shown as an issue within the Diamond Valley Subbasin since almost the entire subbasin is already under water.

ANCHOR – See above response.

3. What is “Regulatory Compliance”? The term needs to be explained since it is not clear what is meant by the term. The best approach may be to delete this

entire line since it does not appear to relate to the Assessment Report or the rest of this Watershed Management Plan.

ANCHOR – This term has been changed to Beneficial Uses

5. Page 5, first paragraph. Delete the word “and” from the last sentence.”

ANCHOR – Comment noted.

6. Page 9, the second paragraph. The last sentence needs to be replaced with the following: “Additionally, the SMRW contains five water bodies listed as “impaired” under the Clean Water Act. Impairments to beneficial uses from sedimentation and erosion, and nutrient enrichment, have been historically identified in the SMRW. Possible sources for these impairments include agriculture, urbanization, and natural background conditions.”

ANCHOR -- Text change made as requested.

7. Page 9, fourth paragraph. The first sentence should be revised as follows: “The SMRW contains a total area of approximately 750 square miles (475,000 acres) drained primarily by the lower Santa Margarita River.”

ANCHOR -- Noted; no change made

8. Page 11, Section 2.3.1. Add the following to the end of this paragraph: “However, this figure does not incorporate improvements to water quality that occurred within the SMRW in recent years.”

ANCHOR -- We have no information relative to the improvements

9. Page 12, first paragraph. Replace the word “eutrophic” with “eutrophication because of historic sewage treatment discharges directly into the estuary that were discontinued in the late 1990’s.”

ANCHOR -- Comment noted

10. Page 12, first paragraph. Remove everything after the comma in the last sentence.

ANCHOR -- Comment noted

11. Page 12, fourth paragraph. This paragraph should be rewritten as follows: “Murrieta Creek is on the state list for phosphorus. Stakeholders in this management area have concerns that the sources of bio-available phosphorus have not been determined, and that the standards and impact determinations of the SDRWQCB may not be based upon accurate and updated information.”

ANCHOR -- Text modified to incorporate concern of commenter.

12. Page 12, fifth paragraph. Add the term Management Area to the heading and add the following to the front of the sentence “Virtually all of this management area is a water supply reservoir. As a result, ...”.

WELCH

THE TEXT WAS CHANGED TO IMPLEMENT THIS RECOMMENDATION

13. Page 12, sixth paragraph. The last sentence is a fragment. We suggest adding the following to make it complete “are used for waste water treatment and disposal.”

WELCH

THE TEXT WAS CHANGED TO IMPLEMENT THIS RECOMMENDATION

14. Page 13, first paragraph. Repeat comment number 13 here.

WELCH

THE TEXT WAS CHANGED TO IMPLEMENT THIS RECOMMENDATION

15. Page 16, second paragraph. Either delete the term “dozens of” or provide an accurate number.

WELCH

WE DON'T HAVE AN ACCURATE NUMBER FOR THE NUMBER OF WELLS IN THE BASIN. WHILE THE "DOZENS OF" SENTENCE IS A DIRECT QUOTE FROM THE WATERSHED ASSESSMENT, I MODIFIED THE TEXT TO PROVIDE A BIT MORE SPECIFICITY.

16. Page 16, sixth paragraph. Please provide a reference for this information.

WELCH

Reference included

17. Page 22, Table 2-2. No part of Anza Borrego State Park is located within the De Luz Management Area. Also, there is an area of BLM ownership in the watershed south of Temecula.

KTUA

– edit table as requested

18. Page 23, Table 2-3. The habitat information appears to be pre-Diamond Valley Lake. Most of this sub-basin is now lake, not dry land. This information should be updated.

KTUA

Table has been updated

19. Page 23, first paragraph. The second sentence should be corrected to read: “Table 2-3 also shows an increase in Indian Reservation lands. While some of the differences may be caused by land use coding errors, at least some of the difference is attributable to recent tribal land acquisitions. For example, since 2000, the Pechanga Band has purchased approximately 970 acres south of Temecula.”

KTUA

– edit as shown below

Table 2-3 also shows that the increase in Indian Reservation lands, ~~which appears to be the result of potential coding errors within the Riverside Assessor Parcel data, as the General Plan land use boundaries appear to more closely match the ownership boundaries depicted on Figure 1-8 (Appendix C).~~ While some of the differences may be caused by land use coding errors, at least some of the difference is attributable to recent tribal land acquisitions. For example, since 2000, the Pechanga Band has purchased approximately 970 acres south of Temecula.

20. Page 24, first line. Please insert the word “local” between “state” and “or”.

KTUA

– insert as requested

21. Page 24, Table 2-4. Delete the population growth for the Diamond Valley Management area.

KTUA

– Do not edit, there is still a fringe of residential surrounding the Reservoir that may account for the population increase. Without a more detailed analysis, we cannot support deleting the values.

22. Page 24, third paragraph. Revise the second sentence in this paragraph to read as follows: “Therefore, while managing growth and development is important throughout the entire SMRW, growth management is crucial in the Temecula-Murrieta Management Area since most of the project urbanization is expected to occur in this area. In contrast, agricultural and rural growth impacts are more prevalent in the De Luz and Ysidora Management Areas.”

KTUA

edit as shown below

Therefore, while managing growth and development is important throughout the entire SMRW, growth management is crucial in the Temecula-Murrieta Management Area since most of the projected urbanization is expected to occur in this area. In contrast, agricultural and rural growth impacts are expected to be more prevalent in the De Luz and Ysidora Management Areas. ~~land use decisions here have the potential to exacerbate down-stream problems within the De Luz, Ysidora, and Santa Margarita Estuary Management Areas.~~

23. Page 25, first paragraph. This paragraph contains a number of items that need to be corrected. First, delete everything after the word “surfaces”. There is no evidence that those items are either occurring or resulting from impervious surfaces. Second, the sentence in the middle of the paragraph beginning with “At higher levels ...” needs to be deleted because it continues the mistaken impression that the primary drainages in this area are not ephemeral or intermittent.

KTUA – edit first paragraph as shown below

Impervious surfaces (asphalt, concrete, and to some degree turf grass), by their very nature and by how they are utilized, increase surface water runoff from storms and landscape irrigation. This increased surface water runoff can result in flooding, pollution, and erosion and sedimentation if not controlled and managed. In the SMRW, current and past construction techniques and development patterns have created large expanses of impervious surfaces that may be ~~are~~ linked to the need for hydrologic modifications and may contribute to existing water quality problems. “Imperviousness” has been identified as a primary indicator to measure the impacts of land development within a watershed, and it is generically defined as areas that do not allow infiltration of surface water. At higher levels of urbanization (high degree of imperviousness), stream base flow is typically diminished in perennially streams through decreases in infiltration, stream base

flow can also be augmented in more ephemeral systems due to contributions from urban and agricultural dry-weather flows, stormwater flows are typically larger and more frequent, sediment loads can be higher due to increased velocities and the stability of the stream channels can be degraded. Pollutant loads are also typically increased in areas of high urbanization as runoff picks up and suspends pollutants that have been deposited on the impervious surfaces as it flows over them. Infiltration of rainfall is typically greatly reduced due to decreases in pervious areas, which can result in reductions in groundwater recharge and resultant availability.

24. Page 26, first paragraph. Replace the word “jurisdictions” with “management areas” Also, the last sentence in the paragraph needs to be removed since it does not appear to be a somewhat random insertion that is not supported by the document.

KTUA -- edit as requested

25. Page 26, second paragraph and Table 2-5. This part of the document misuses information concerning impervious percentages and instream conditions in areas with permanent water sources. Table 2-5 incorrectly presumes that each jurisdiction is a watershed and then inappropriately draws a conclusion based upon that presumption. In addition, the referenced paragraph adds nothing to the discussion and should also be deleted.

KTUA

– please edit as follows – only a portion of this text was written by KTUA to begin with.

To understand the impact of impervious surfaces on the integrity of the watershed it is important to know and understand more than just the overall percent imperviousness ~~surface~~. It is also important to understand the types and distribution of impervious surfaces to select appropriate management practices to eliminate, reduce, and minimize the negative effects caused by stormwater and dry-weather runoff from these surfaces. ~~Recent research into the differences between grass and bare soil, for example, has helped to advance this understanding.~~

26. Page 27, Section 3.1.1. This paragraph is somewhat inaccurate and needs to be rewritten as follows: “Flooding is experienced to some degree throughout the Murrieta-Temecula management area during the El Niño weather pattern when above average rainfall is common. The amounts of impervious surface in some parts of this management area do contribute to higher peak flows.”

EVEREST/Anchor

Comment noted

27. Page 28, Section 3.1.2. The second, third and fourth sentences should be replaced with the following: “During high flow storm events, streambeds and banks are exposed to highly erosive stream flows. Streams typically respond to high flow conditions by increasing their cross-sectional area. This accommodation is commonly done by either channel widening, channel down cutting, or by channel migration. This results in a highly unstable phase where the stream experiences severe bank erosion and riparian habitat degradation.”

EVEREST/Anchor

Comment noted

28. Page 28, Section 3.1.2. In the first paragraph insert the word “agriculture,” between “where” and “development” and delete the word “use”. **Disagree**. Also, delete the first sentence in the second paragraph since it is out of place with the rest of the discussion. We suggest that the remaining sentence be added to the first paragraph.

ANCHOR

Sentence added to give reader an explanation why the Plan does not address the most obvious water quality issue, the exceedences of water quality standards.

29. Page 29, Section 3.2.1.1. The first paragraph needs be revised to reflect actual facts and conditions. The first paragraph should be rewritten as follows: “There are significant water quality data shortfalls within the SMRW. **Ok**

It is believed that some of the determinations of “impairment” are based upon either obsolete data for pollution sources that no longer exist or are based upon inappropriate numeric criteria.

Inappropriate for study team to include this statement.

This continues to be a major problem in the classification of water quality conditions within the SMRW. There is also a concern because of the historic lack of coordination between federal, state, and local jurisdictions. This data gap is a result of several factors:” In addition, the fourth bullet needs to be revised to read: “Inadequate data to make scientifically valid conclusions about pollutant sources and solutions”

ANCHOR -- Bullet deleted

30. Page 29, Section 3.2.1.2. There is no ending to the last sentence. We would suggest the following” “applicable and have any potentiality of improving actual water quality.”

ANCHOR

See change made for SDRWQBC

31. Page 30, Fourth Paragraph. This paragraph seems to imply that the higher TDS concentrations in parts of the local groundwater are the result of some human action rather than natural geology. This is inappropriate and needs to be removed from the document.

WELCH

THE CITY IS INCORRECT - HUMAN ACTIVITY IS THE PRIME SOURCE OF HIGH TDS CONCENTRATIONS. I ADDED LANGUAGE TO IDENTIFY ALL SOURCES OF THE PROBLEM, INCLUDING THE NATURAL GEOLOGY.

32. Page 31 and 32. We would suggest reversing the order of Section 3.3.3 and 3.3.4.

ANCHOR

Same order as assessment

33. Page 32, Section 3.3.4. The last sentence does not seem to fit with the rest of the paragraph and should either be removed or made connected to the topic under discussion.

MERKEL

Response: The text has been reworded as per request.

Add to text:

Develop large mitigation banking and restoration programs that will enhance the overall benefits to the watershed. This would be used to replace small haphazard and fragmented mitigation or compensatory mitigation that may have little overall benefit to the ecosystem.

34. Page 33, Section 3.4.2. The second and third sentences need to be deleted since it repeats the same information as was identified in Comment No. 25.

KTUA – please edit as follows

The effects of impervious surfaces have been linked to a wide range of environmental issues including, but not limited to: higher flood elevations; increased frequency of flooding; decreased natural base-flows and associated groundwater recharge; increased dry-weather flows from agricultural and urban runoff; increased flow velocities and associated stream-bank erosion and sediment transport; habitat degradation and loss; improved conditions for exotic species; and increased pollutant loads related to urbanized land uses. Existing conditions identify the Temecula-Murrieta Management Area as having impervious surfaces accounting for approximately 22 percent of its land area, placing it in the lower portion of the Impacted category, nearing the Non-Supporting category. This is a concern not only for this Management Area, but for the three downstream management areas as well. Future urbanization and associated impervious surfaces throughout the SMRW are cause for concern, but this is especially true within the Temecula-Murrieta Management Area since it is expected to experience a significant portion of this growth and development. Developing mechanisms to map and manage impervious surfaces is a key issue of concern within the entire SMRW, with an emphasis being placed on the Temecula-Murrieta Management Area.

35. Page 33, Section 3.5.1. In the last sentence add the words “with a broad base of support” after the words “data manager”.

KTUA – edit as requested

36. Page 34, Section 3.5.4. In the second sentence insert the word “was” between “problem” and “identified”.

ANCHOR -- Text change made as requested.

37. Page 35, second paragraph. Delete the last paragraph.

ANCHOR --Comment noted

38. Section 4. We would recommend replacing the heading “Summary of Problem” with “Summary of Concern”.

ANCHOR -- Comment noted.

39. Page 37, Affected Management Areas. Add the Vail Management Area to the list.
ANCHOR -- Text change made as requested.

40. Page 37, Contributing Elements.

1. Add “Climate (particularly the El Niño weather pattern)” as the first bullet item.

EVEREST Agreed that climate changes are a contributing element in flooding; however, contributing factors identified in the document are those factors attributed to the activities of man.

2. 1st Bullet: What is the source of this statement and why is it a contribution to flooding?

EVEREST It is a contributing element for flooding because different stakeholders define flooding differently. Some stakeholders consider flooding to represent water-related damage to human infrastructure while others view flooding as impacts to habitat and wildlife. In addition, if a stream reach has been channelized then some stakeholders would consider that the floodplain has been redefined to fit within a confined channel while other stakeholders may still view the area outside the lined channel as the floodplain.

3. 2nd Bullet: What is the source of this statement? It should be deleted because it does not seem accurate.

EVEREST Floodplain delineation documentation was obtained for portions of the watershed but not the entire watershed, including all the tributaries. This also goes to the issue of the definition of the floodplain as discussed above. This text is not referring solely to regulatory agency floodplain delineation/mapping (e.g., FEMA) but rather to the broader delineation/mapping of the floodplain in the context of regulatory, physical (flow and water level), and habitat definitions; therefore, the text will remain as written.

4. 4th Bullet. What is the source of this statement? It should be deleted if it is not factual.

EVEREST Bullet deleted.

5. 5th Bullet: Should be deleted because there are very few hard sided or bottomed channels in the watershed.

EVEREST I agree with the reviewer though with regards to the fact that we do not know how extensive this problem is because we lack data on the type and extent of channelization. On the other hand, I disagree with the reviewer in deleting the comment precisely because we do not know the extent of the channelization. Please have the reviewer provide documentation that shows that there are very few hard sided or bottomed channels in the watershed, including the definition of “few” which may mean different things to each stakeholder. Some stakeholders would say that any hard channels are too many; without specific information, generally speaking, hard channels contribute to flooding. It would be as irresponsible for the technical team to delete reference to hard channels as a contributing factor as it would for us to say it was the main factor.

41. Page 38, Early Action Recommendations.

- 4th Bullet: Since most flooding occurs during extreme (and/or multiple) rainfall events, the SDRWQCB BMPs will not be effective. As a result, this item should be deleted.

This was added by another stakeholder.

- 8th Bullet: Delete, it is redundant with the 5th bullet item.

Delete bullet 8.

9th Bullet: This is not a very useful action since it is too vague. As a result, this item should be deleted.

EVEREST We disagree with this request. The proposed level of detail for this recommendation fits within the scope of a watershed management plan. However, the text will be changed to state that a “program” should be developed instead of “projects” to reduce the vagueness.

42. Page 38, Long-Term Action Recommendations, the third bullet item. After the words “management areas” insert “(or other methods to mitigate increased flows caused by impervious surfaces)”.

EVEREST -- Text change made as requested.

43. Page 39, Section 4.1.2, Summary of Concern. In the first sentence, add in the Vail Management Area. **Text change made as requested.** Also, in the second sentence replace the word “would” with “could potentially”. **Text change made as requested.** In addition, to the end of this paragraph add the following: “~~As a result,~~ While the potential effects of hydromodification can be listed, there is little information concerning the magnitude of any watershed problems caused by hydrologic modifications.”

ANCHOR -- Text change made as requested.

44. Page 39, Affected Management Areas. Add the Vail Management Area to the list.

ANCHOR -- Text change made as requested.

45. Page 39, Contributing Elements. Replace the word “knowledge” with “information”.

ANCHOR -- Text change made as requested.

In addition, the third bullet point is incorrect and should be deleted; there are several federal and state laws regulating hydrologic modifications.

EVEREST --

We disagree with this comment so the text will remain unchanged. While one stakeholder may feel that adequate regulations are in place other stakeholders feel that adequate regulation are not in place to limit continued implementation of hydromodifications.

46. Page 40, Long-Term Action Recommendations. **EVEREST**

- The first bullet item is already being planned by Riverside County Flood Control District.

EVEREST Comment noted.

- The second bullet item should be deleted. It is not necessary since there is already adequate legal authority in place to address these issues.

EVEREST We disagree with this comment. As acknowledged in the preceding comment, an acceptable level/limit of hydromodifications throughout the watershed has not been established yet; therefore, the regulatory controls/protocols have not been developed yet either.

47. Page 40, Section 4.2.1. At the end of the second sentence replace the words “weak and vague” with “impossible”.

ANCHOR

Text changed to incorporate concern of commenter.

48. Page 40, Section 4.2.1. In the fourth sentence replace the words “availability of the” with “valid”.

ANCHOR

Comment noted. In conflict with R9’s comments.

49. Page 41, First Paragraph. Replace the word “understood” with “documented”.

ANCHOR – Text change made as requested. Also, before the last sentence insert the following: “Other than monitoring performed by the County of San Diego relative to its NPDES permit, there have ~~also~~ been no recent water quality studies of the estuary and lagoon areas since the USMC discontinued their point source discharges.”

50. Page 41, Affected Management Areas. Add the Santa Margarita River Estuary.

ANCHOR -- Text change made as requested.

51. Page 41, Contributing Elements. Replace the first bullet point with the following: “Lack of any recent studies to identify actual water quality impairments and their potential sources”

ANCHOR – Added text as new second bullet.

52. Page 42. Revise the Second Bullet Item to read as follows: “Encourage ~~the SDRWQCB~~ all stakeholders to participate with local jurisdictions to acquire the funding necessary to undertake a comprehensive water quality assessment for the constituents of concern”

ANCHOR -- Text change made as requested.

53. Page 43, Second bullet point. Add the words “and climate” to the end of the last bullet point.

ANCHOR – Comment noted.

54. Page 44, Summary of Concern. The first sentence should be modified to read: “The issue of concern is that there is a lack of data to support either the viewpoint of the Riverside County Permittees or the SDRWQCB regarding water quality standards set for beneficial uses in the SMRW.” The SDRWQCB states that it has sufficient data for its position. In the second sentence, replace the end of the sentence after “background levels” with the following ””and the lack of differentiation between

the bio-available phosphorus and relatively inert forms of naturally occurring phosphorus.”

ANCHOR -- Language addressing bio v. inert added

55. Page 46, Affected Management Areas. The format of this section does not match the preceding sections. Please revise this to conform to the established format for this section of the Plan. This could be done by summarizing this extensive Affected Management Area discussion under the Summary of Concern discussion. In addition, the recharge/availability data in this report has been “collected or gathered” not “developed”.

WELCH

I REALLY DON'T UNDERSTAND THE COMMENT, AS THE SECTION APPEARS TO FOLLOW THE SAME FORMAT AS ALL OTHER SECTIONS. I FOLLOWED THE REVIEWER'S SUGGESTION, HOWEVER, AND MOVED SOME TEXT FROM THE "AFFECTED MANAGEMENT AREA" SECTION TO THE "SUMMARY OF PROBLEM" SECTION.

56. Page 47, Contributing Elements. Under the second bullet item, the “Wastewater discharges upstream” upstream should be deleted because I thought that the SDRWQCB no longer allowed them to occur. Also under the third bullet point, please add “- Naturally occurring constituents”

WELCH

THE TEXT WAS MODIFIED TO REFERENCE WASTEWATER DISCHARGES TO GROUNDWATER. (THE REVIEWER PROBABLY THOUGH THE REFERENCE WAS TO WASTEWATER DISCHARGES TO STREAMS.) ALSO, THE SECTION WAS REVISED TO INCLUDE A REFERENCE TO "NATURALLY OCCURRING CONSTITUENTS"

57. Page 48, Early Action Recommendations. The beginning of the third bullet item should be revised to begin with: “Develop a program to assess and “ and then this recommendation should be moved to the Long –Term Recommendations.

WELCH

THE EARLY ACTION AND LONG-TERM RECOMMENDATIONS SECTIONS WERE REVISED.

58. Page 49, Early Action Recommendations. Delete the last bullet item.

WELCH

THIS CHANGE WAS NOT MADE - REFERENCE TO CONTINUED REGULATION NEEDS TO BE IN THE WATERSHED MANAGEMENT PLAN REGARDLESS OF WHETHER OR NOT THE CITY OF TEMECULA AGREES WITH THE NEED TO REGULATE STORM RUNOFF

59. Page 52, Long-Term Recommendations. The second bullet item doesn’t make any sense. Please revise it or delete it.

ANCHOR – Bullet revised to make connection between mitigation and invasive species.

60. Pages 53 through 56. There is not a discussion or mention of the Riverside County MSHCP. This needs to be integrated into the Plan.

MERKEL

Response: All of the habitat conservation plans are discussed in section 2.4.4 (page 20,21). The NCCP/HCP term is meant to refer to all the conservation plans without having to mention them all each time.

61. Page 53, Affected Management Areas. Add the Vail and Skinner Management Areas.

Response: Made change

Add to text: Primarily De Luz, Temecula-Murrieta, Vail, and Skinner Management Areas.

62. Page 54, Contributing Elements. The third bullet item doesn't make any sense. Please revise or delete.

MERKEL

Response: Deleted from text

63. Page 54, Long Term Recommendations, Third Bullet Item. What sized lots or width of sheltered wildlife corridors are you recommending as being needed to accomplish this? There is also a General Plan Issue here. This should really be framed from a general plan perspective since State Law requires conformity between the general plan and the zoning requirements.

MERKEL

Response: We are not recommending specific changes. We are suggesting that the land use policies be reviewed from the perspective of watershed protection as well as multiple conservation and the land use policy changes required should be changed if necessary to accommodate broadened goals. This comment also ties in the early Action Recommendations of reviewing corridors on a watershed basis.

Add to text: Identify and pursue land use policy changes that enhance.....

64. Page 55, Contributing Elements. The fourth bullet item is inconsistent with the MSHCP and should be deleted or substantially revised.

MERKEL

Response: Revise as directed below

Add to text: On 4th bullet replace with the following

No venues or programmatic mechanisms exist to implement opportunities that fulfill habitat restoration and beneficial hydrologic modification within the watershed by looking to joint land use with conservation areas

65. Page 56, Long Term Recommendations, Fourth Bullet Item. Where will the extra water necessary to support the additional riparian vegetation come from?

MERKEL

Response: This is beyond the scope of this management plan. We do not know how much water will be reintroduced into the system by restoring natural vegetation and hydraulic regimes to the system. We are, therefore, recommending that programs be established to track changes in the system as improvements are made. This bullet has a lot of different ideas that have received other comments and has been rewritten below:

Add to text: please replace the 4th bullet with the following:

- Establish hydrological regimes sufficient to support a rich diversity of vegetation and species communities. This could be done by determining the feasibility of fish passages, vegetating causeways or dam removal, modifying road crossings, adequately restoring natural vegetation around streams and river to reduce erosion, removing exotic plants and animals, enforcing existing regulations protecting streams and stream vegetation, and pursuing cooperative programs with landowners to improve conditions in riparian corridors.
- Assess the feasibility and benefits of converting existing channelized or concrete areas back to more natural riparian channels for purposes of increased habitat value, improved water quality benefits and expanded basin recharge.

66. Page 56, Summary of Concern. The two sentences starting with “The separation of” should be deleted. These statements are not related to the rest of the document and appear to be random additions.

KTUA

– **edit the section as follows**

As indicated previously, the backbone to any successful large-scale land management effort is the cooperation and coordination of the entities having land management responsibility and authority. Within the SMRW there are approximately twenty entities with land management authority excluding the various regulatory agencies, political districts, non-governmental organizations (NGOs), community and service groups, and interested citizens. Also, unlike many southern California watersheds, only the mid-section of the watershed, centered on the cities of Temecula and Murrieta, contains the bulk of the urban development. This ~~The separation of significant areas of development from the mouth of the river and estuary creates a physical and jurisdictional separation between the likely sources of contributing ~~impairment factors~~ pollutants and stressors and the resources being impacted by them. These characteristics ~~This separation~~ means direct linkages are more difficult to define and manage because the jurisdictions most likely generating the pollutants and stressors ~~impairments~~ are not the jurisdictions managing the resources being impaired, making inter-jurisdictional coordination and cooperative all the more critical. Developing a stable, flexible process and structure that allows for and encourages cooperation, coordination, and open communication and collaboration on management activities is essential.~~

67. Page 57, Contributing Elements. The fourth bullet item should be deleted.

KTUA

– do not delete – bullet was edited in SDSU comments

68. Page 58, Summary of Concern. The third sentence needs to be deleted. See comment numbers 25 and 33. In addition, in the first and fourth sentences delete the word “negative”.

KTUA – edits as shown below

A growing number of watershed managers and scientists have conducted field studies and analyses that have linked impervious surfaces to negative affects on a wide range of environmental issues including: higher flood elevations; increased frequency of flooding; decreased natural base-flows and associated groundwater recharge; increased dry-weather flows from agricultural and urban runoff; increased flow velocities and associated stream-bank erosion and sediment transport; habitat degradation and loss; improved conditions for exotic species; and increased pollutant loads related to urbanized land uses. Managing impervious surfaces has the potential to have positive effects on numerous environmental problems and needs to be pursued with this broad perspective as guidance. In addition to this general guidance, special attention should be given the active management and control of impervious surfaces within the Temecula-Murrieta Management Area, since the initial analysis shows it has approximately 22 percent of its land area covered with impervious surfaces. The control and management of these surfaces is not only a concern within this management area, but also in the three downstream management areas as well since many of the ~~negative~~ impacts associated with impervious surfaces do not always immediately present themselves within the vicinity of their occurrence but often cumulate and surface downstream.

69. Page 59, Affected Management Areas. Just indicate that it is Watershed-wide.

KTUA -- change as requested

70. Page 59, Contributing Elements. Delete the last five words from the first bullet item.

KTUA -- -- change as requested

71. Page 59, Early Action Recommendations.

1. 2nd Bullet: Delete the words “mapping and analysis” **KTUA -- change as requested**

2. 3rd and 4th Bullet: Delete the word “negative” **KTUA -- change as requested**

72. Page 59, Long-Term Recommendations.

1. 1st Bullet: Revise to read as follows: “In conjunction with the local work group, promote policy and other changes within all the local jurisdictions in the SMRW to minimize the effects of impervious surfaces.” **KTUA – change as requested**

2. 2nd Bullet: Delete everything after the word “scales”. The San Diego County approach may not work everywhere. **KTUA – change as requested**

73. Page 60, Early Action Recommendations. How will a “standard” monitoring design alert planners and managers?

KTUA

– these edits are in addition to those addressing SDSU’s comment

Adopt a “standard” monitoring design for that is compatible with other federal, state, and local programs, such as the state’s Surface Water Ambient Monitoring Program (SWAMP), within the SMRW, whose results ~~that~~ will assist in alerting planners and managers to water quality threats in the watershed. This will involve developing a list of key questions by watershed partners and appropriate sampling designs to answer those questions. Key participants should include researchers with expertise in sampling design and watershed processes, regional planners, land managers, regional water quality control board, and others. Monitoring sites will include both sites where automated monitoring stations can be used and those where only hand samples will be adequate to measure some variables

74. Page 61, Long-Term Recommendations. The first bullet item is not an action.

KTUA

– already combined this with an Early Action while addressing SDSU’s comments

75. Page 64, Sixth Bullet Point. Enforcing BMP’s is not an education tool and this bullet point should be deleted.

KTUA

– KTUA did not write this bullet, but agree that it should be deleted as requested

76. Table 5-1. The prioritization format is not very clear and there should be some organization to the actions to show the timing relationships. Also, putting in dates for anything other than the immediate organizational components is probably meaningless since the consensus building part of the political level may take a fair amount of time. Maybe a solution is to give an anticipated formation date for the watershed council and state that the other dates are dependent upon the council’s formation.

ANCHOR This was generally agreed to at our last meeting.

Our general observations are as follows:

1. The political consensus building should be the first step for most of the non-SDRWQCB related activities.

Agreed that creating a watershed council is highest priority

2. The general clusters of implementation measures should probably be organized along these lines. (It may also make sense to break the implementation measures into affected-jurisdiction clusters.)

Agreed that there are other ways to organize the measures –it is appropriate to allow the new council members to organize these recommendations, and perhaps others, as they deem suitable. However, see answer to SDRWQCB above.

- Ongoing activities that can continue
- Actions of the SDRWQCB
- Future actions that don’t require a functional watershed council
- Actions related to the formation of the watershed council
- Future actions requiring a functional watershed council

77. Pages 67 to 77, Table 5-1. Please implement our previous comments and comments. **ANCHOR**

See above

78. Page 77, Section 5.3. In the sixth sentence (beginning with “Other conflicts”), delete the words “understood or”.

ANCHOR Comment noted

79. Page 78, Number 2. In the fourth sentence insert the word “and” between “made” and “by”.

ANCHOR – Comment noted.

80. Page 79, Number 4. Delete the words “The options are discussed” and merge the remainder of that sentence onto the first sentence.

ANCHOR – Text change made as requested.

81. Appendix C. The Cactus Valley part of the watershed above Diamond Valley Reservoir is still shown as part of the watershed on Figures 1-1, 1-12, 5-1, 5-2, 5-3, and 5-4. In addition, on Figure 5-3, the Rainbow Creek drainage is incorrectly colored as being part of the Murrieta-Temecula Management area.

KTUA

– All figure edits have been addressed as requested

Jim Jenks

1. Page 38.

The fifth early action recommendation calls for additional stream flow monitoring stations on Temecula Creek below Vail, Wilson Creek above Vail, Cahuilla Creek and Tocalota Creek. Also the eighth recommendation calls for a flow gauge on Temecula Creek below the reservoir.

Agreed that the eighth recommendation is redundant with the fifth recommendation so the eighth recommendation will be removed.

EVEREST Nearly all flow in Temecula Creek below Vail is discharged from Vail Dam and measured with a meter at the discharge point. Similarly, most of the flow in Tocalota Creek is discharged from Lake Skinner and measured at the point of discharge. Comment noted

Also, the USGS operated a gaging station on Wilson Creek at Sage Road between Oct 89 and Sep 94. The station was discontinued because the alluvial nature of the channel made it difficult to maintain an accurate gage height record.

Comment noted

2. Page 46

The paragraph entitled "Affected Management Areas" suggests that there are groundwater recharge concerns in the DeLuz MA but not in the Vail MA. However, the text on page 13 indicates relatively minor groundwater storage in the DeLuz MA but relatively significant groundwater resources in the Vail MA. Accordingly it appears that the Vail MA should be added to the MAs where there is concern about groundwater recharge.

WELCH

THE TEXT WAS CHANGED TO IMPLEMENT THIS RECOMMENDATION

3. Page 47

Item No. 3 under Contributing Elements suggests that groundwater quality in the DeLuz MA can be impacted by irrigation/fertilizer operations and septic tank discharges. Those possibilities also apply in the Vail MA.

WELCH

THE TEXT WAS CHANGED TO IMPLEMENT THIS RECOMMENDATION

4. Page 49

I suggest that RCD's be added to the entities with which to coordinate regarding educating growers.

WELCH

THE TEXT WAS CHANGED TO IMPLEMENT THIS RECOMMENDATION

5. Page 54

I suggest one of the Early Action Recommendations should be to establish contact with Cal Trans to identify alternative ways to mitigate the I-15 obstacle to animal movement.

MERKEL

Response: Made changes to text. Also required more lead in to the problem of connectivity in corridors

Add to text:

Add as a second bullet in Early Action Recommendations–

- Coordinate with Cal Trans on future activities to seek ways to mitigate or enhance crossings along large barriers such as the I-15 obstacle to animal movement.

6. Page 83

The section on Funding to Implement Strategies needs to address continuing sources of funding for operation of recommended facilities. For example it now costs \$17,600 for the USGS to operate one gaging station for one year and it costs \$23,925 for the USGS to operate a water quality station for one year.

ANCHOR – Text change made as requested.

SDSU Field Station Programs
Comments on the DRAFT Santa Margarita River Watershed Management Plan

1.3.1

Goal 8: define “key natural”

Goal 9: define where these areas can occur

Goal 10: define “critical ecosystems

ANCHOR -- Interpretations, changes, and additions to the goals of the watershed management plan are to be made with the working group/stakeholders.

1.3.3, Pg 6; Under heading “Research”

SMER, a 4500-acre research and educational field station is administered by SDSU Field Station Programs. Since 1962, researchers supported at the field station have conducted studies on natural environments ranging from geology, soils, plants, animals and ecosystem processes. These include studies with direct application to watershed management including hydrology, water quality, invasive aquatic species, regional habitat connectivity, wildlife movement and tracking, fire ecology, and nitrogen deposition.

ANCHOR – Modified text added as requested.

2.4.3, Pg 20, 4th paragraph

The Plan should underscore the importance of the Santa Ana – Palomar Mountains Linkage and the role of the watershed lands in supporting this regional linkage. We recommend the following language:

The Santa Ana – Palomar Mountains Linkage is a habitat linkage of ecoregional importance (Luke et al. 2004) that lies in the lower watershed. These lands that link protected lands on Palomar Mountain to the Santa Ana Mountains via coastal habitats at USMCB Camp Pendleton are one of 15 priority landscape linkages needed to establish an ecologically viable network of wildlands in the South Coast Ecoregion. They are the only remaining natural habitat connection for the Santa Ana Mountains, the only remaining habitat in the South Coast Ecoregion that still links natural coastal areas to inland mountain ranges, and the only habitat preventing eventual extinction of the mountain lions and other top predators in the Santa Ana Mountains and adjacent coastal habitat (Beier 1993, Luke et al. 2004). As such, watershed management planning must carefully consider the role that riparian and upland habitats in the watershed play in sustaining ecoregional processes well beyond the boundaries of the watershed.

The Santa Ana – Palomar Mountains Linkage is a habitat linkage of ecoregional importance (Luke et al. 2004) that lies in the lower watershed. These lands that link protected lands on Palomar Mountain to the Santa Ana Mountains via coastal habitats at USMCB Camp Pendleton are one of 15 priority landscape linkages needed to establish an ecologically viable network of wildlands in the South Coast Ecoregion. They are the only remaining natural habitat connection for the Santa Ana Mountains, the only remaining habitat in the South Coast Ecoregion that still links natural coastal areas to inland mountain ranges, and the only habitat preventing eventual extinction of the mountain lions and other top predators in the Santa Ana Mountains and adjacent coastal habitat

(Beier 1993, Luke et al. 2004). As such, watershed management planning should consider the role that riparian and upland habitats in the watershed play in sustaining ecoregional processes well beyond the boundaries of the watershed when prioritization of actions occur.

MERKEL

Response: Add to text.

3.1.1, Pg 27

All flooding should not be viewed as a problem. The Santa Margarita Watershed is unique among watersheds in southern California in that its flood waters are NOT contained. This allows “natural” processes to continue – e.g., knocking down willows and cottonwoods and creating a brushy riparian habitat preferred by many riparian species (including T&E species such as the Least Bell’s Vireo). In addition, Fisher and Swift found that native fish populations increased after floods. The consequences of an increasingly flashy flooding cycle (i.e., more flooding per rain event) is not well documented but clearly some flooding is advantageous and needs to be maintained.

ANCHOR -- Added to text: “This document acknowledges that some flooding may be beneficial to natural processes (habitat creation, e.g.), however the stakeholder process has identified flooding as it relates to hydromodification and impervious surfaces as an issue to address in this document. Future versions of this WMP could address more fully the relationships between flooding and natural processes.

3.2.1.1, Pg 29 Surface Water Quality.

The most significant reason that data gaps exist is that:

Key management questions regarding water quality in the watershed have not been properly identified and addressed with an organized monitoring design specifically targeted to answer the question at hand. Instead, managers have hoped to piece together disparate data collected for other reasons to address their questions. This has led to recognition that existing data are not sufficient to address key management questions.

ANCHOR – Text modified as requested.

3.3.1 Pg 31

T&E species and other special status species ARE an issue that should be highlighted by the plan. At least we need to say that changes in water quality and flow have substantial potential to affect these species. We need to find funding for and conduct studies that specifically address the relationship between change in watershed processes and population sizes for these species so that we understand the potential impact of changes in water supply and quality on special status species.

MERKEL *Response to comment:* Water quality and flow may be related back to sensitive species and we need a better understanding on the importance of these potential impacts. Add the following changes in text on page 31 or, preferably, incorporate into the hydrology section with a reference to it in the issues of concern (section 3.3.1).

Add to text: Change the last sentence to read as follows

Further, changes in water quality and flow may also have substantial potential to affect sensitive species. However, the relationship between change in watershed processes and population sizes for these species needs to be better understood in order to assess the potential impact of changes in water supply and quality on sensitive species. These areas of concern should be a focus of further investigation within the watershed. Because of the integration of species into habitat improvements considerations, issues associated with threatened and endangered species will not be examined further as an individual issue of concern.

3.3.3 Pg 31 Corridors and Linkages

Also, note that these corridors have regional relevance that extends far beyond the boundaries of the Santa Margarita Watershed.

MERKEL Response: Made changes to text to reflect that the corridors extend beyond the boundaries of the watershed. This was done to stress the importance to the watershed not the importance to the region as written in the comment.

Add to text:

These corridors are not isolated within each planning area but linked regionally, extending beyond the boundaries of the watershed, and have been designed for a wide variety of species.

3.3.4, Pg 32

Habitat Protection and Restoration should include riparian as well as upland habitats that serve to protect water quality and supply.

MERKEL

Response: Made changes to text.

Add to text: Protection of the habitat along the riparian corridor and its upland buffers is essential to maintaining the viability of the drainage system for many aquatic resources.

3.5.4, Pg 34 Recreation. This section should at least mention that a concern is that recreation is often most intense in riparian areas. These activities need to be monitored and potentially regulated to ensure that they don't impair watershed values (water quality and riparian habitat for special status species).

ANCHOR – Text modified as requested.

Section 4 Action Recommendations

Seems to me the whole point of the Plan is balance human impacts and natural resources (as per the quote on the website). Yet the Plan does not provide this balance with regards to natural habitats, species, etc. within each of the Action Recommendations. We give some edits and comments to ensure that the importance of water supply and quality in supporting natural resources are adequately addressed in each section. We recommend that this theme is carried throughout the document.

ANCHOR -- Add sentence at end of first paragraph:

These action recommendations include the direction provided from a variety of stakeholders with diverse viewpoints as well as the input from the Study Team. To respect the stakeholders' various perspectives and interests, where the Study Team relies on the personal knowledge of a stakeholder, or where stakeholders disagree, parenthetical reference to the originator of the recommendation has been made.

4.1.1 Summary of Problem

The Plan needs to state that some flooding is necessary to maintain natural riparian processes. Perhaps a second paragraph under the Summary of Problem that starts: "At the same time, flooding is critically important for maintaining the dynamic processes necessary to support habitats for plants and animals in the watershed." Follow this by a few brief statements from the ample literature on this topic. Ensure that flooding continues to be an important natural element of riparian habitat disturbance.

Amend Assessment in the future to include this as a topic.

Second Sentence: this should include habitat degradation

Add as second paragraph under Summary of Problem:

Flooding is an important natural process that supports habitats and other watershed functions.

EVEREST The impact on plants and animals of modification of the hydrology, including flooding, is also a concern in the watershed. However, while this Plan recognizes the positive effects of flooding on riparian habitats and species, through the stakeholder process this document currently focuses on human causes of flooding.

Contributing Elements. Add:

- incision and channels that have become less braided
- effects of increasing flashiness of floods due to increases in impermeable surfaces in the upper watershed on plants and animals are not documented

Early Action Recommendations

1st bullet: include the terms terrestrial (upland) and aquatic habitat(s)

ANCHOR – Text modified to incorporate concerns of commenter.

3rd bullet: sometimes lateral extent of the floodplain should be increased because it has been too channelized and a better solution would be restoration of the floodplain vegetation.

ANCHOR/Everest

- Conduct an assessment to identify potential river/stream reaches that would be suitable for floodplain restoration and revegetation.

4th bullet: assess any necessary improvements to existing BMPs and ensure compliance with BMPs (and code compliance monitoring) throughout the duration of the project.

ANCHOR – Text modified to incorporate concern of commenter.

5th bullet: how are critical reaches defined? The most likely place for the Temecula Creek station is just downstream of the confluence with Pechanga Creek (also called Wolf Creek).

EVEREST The reaches listed in the text are the critical reaches as defined on the basis of data adequacy established in the Watershed Assessment.

- Collect data on the effects of flood flashiness on riparian habitat and plant and animal species in the watershed.

ANCHOR – Text modified as requested.

- Establish guidelines for flood frequency and intensity needed to maintain key habitat elements that support native species.

ANCHOR – Text modified as requested.

Also, some of these recommendations don't match the section topic of flooding (e.g., bullets #5-8). Many of these issues are about flow but not necessarily about peak flow.

We recommend pulling out a section about Base Flows to address these issues more appropriately.

Comment noted

Also, bullet 8 is covered by bullet 5.

Bullet 8 deleted.

Long-term Action Recommendations:

2nd bullet: needs to be compatible with existing planning (e.g. MSHCP)

clarification made to text

3rd bullet: is should be made clear that this program is intended to decrease the “typical” amount of impervious surface as development continues

KTUA

I disagree with this comment. The intent of this recommendation is to define the balance of acceptable impervious surfaces allowed throughout the watershed. In some areas this may mean a reduction and in other areas it may mean an increase as determined through consensus of the stakeholders. If all stakeholders agree to a watershed-wide reduction in the current amount of impervious surfaces and future rates of impervious surface construction then we can make the requested change.

Also, one goal should be to prevent future development within flood areas so that drainages do not need to be channelized

This is addressed in the first two long-term action recommendations.

4.1.2 Summary of Problem:

Provide clear statement of potential effects of hydromodification

At end of paragraph, add:

EVEREST While the potential effects of hydromodification can be listed, there is little information concerning the magnitude of any watershed problems caused by hydromodification.

Line five should include both degradation of water quality and changes in water flow
EVEREST Add: “changes in water flow” to sentence

Early Action Recommendations:

Explicitly state the need to assess existing conditions to establish a baseline for future monitoring activities to compare to

KTUA Add as last EA recommendation:

- Assess existing conditions to establish a baseline for future monitoring activities

Long-term Action Recommendations:

1st bullet: can you include the need to identify locations where modification is incompatible?

KTUA The intent of this recommendation is to identify locations where modification is incompatible as well as locations where it is compatible; therefore, we do not see the need to modify the text.

4.2.1 Summary of Problem

Need to make a start here by providing a brief list of the major water quality issues that need to be addressed. At least mention 303d and whether they are accurate representations (e.g., what are the peak charges of contaminants through the system?). (Also – I don’t see much reference to CDMs Framework Monitoring Plan. One the problems with this watershed is that we don’t read each others management plans and keep recreating the wheel).

ANCHOR Added: water quality data presented in Assessment and reference has been added; clarification of specific problem, the lack of data and the lack of coordination of data.

Contributing Elements

Bullet #2: for what purpose? Perhaps we need a new bullet that says that we don’t know what we all want to monitor. If we have different goals for water monitoring then of course we can’t decide of a common monitoring plan.

New bullet: No clear understanding of needs of all stakeholders relative to monitoring (regulatory, research, or educational, monthly or annually, by volunteers or professionals, etc.)

Early Action Recommendations:

- Collaborate with watershed researchers to establish targeted monitoring research designs that address specific management goals

ANCHOR – Text modified as requested.

Long-term Action Recommendations:

Standardization of data collection, coordination, and storage

Establish an analysis center and clearing house allowing for access and sharing of data.

Determine the effects of changes in water quality on natural resources (~~environments and native species~~).

ANCHOR -- Text modified as requested.

4.2.2 Long-term Action Recommendations:

Create a scientific advisory committee to provide assistance and oversight through out the process

ANCHOR – Added to long-term action recommendations.

4.3.1 Groundwater Recharge *and Quality*

Summary of Problem

Also need to include that changes in ground water levels affect vegetation communities (e.g., probably riparian vegetation along Temecula Creek). We need to figure out which habitats may have already been affected and which ones are at risk due to changes in groundwater levels.

WELCH

THE TEXT WAS CHANGED TO NOTE THAT WATER AVAILABILITY MAY AFFECT HABITAT, AND THAT GROUNDWATER DEPTHS MAY BE A KEY INFLUENCE OF WATER AVAILABILITY IN SOME AREAS.

Early Action Recommendations –

Determine areas of change in ground water levels and their effects on vegetation by analyzing historic data sets. Use results of this analysis to evaluate potential impacts of ground water use decisions.

WELCH

THE TEXT WAS MODIFIED TO RECOMMEND ADDITIONAL DATA GATHERING ON AFFECTED HABITATS, BUT THE ANALYSIS OF HISTORICAL DATA SETS WAS NOT RECOMMENDED, AS THIS WOULD NOT NECESSARILY INDICATE (1) WHERE GROUNDWATER DEPENDENT HABITAT WAS LOCATED OR (2) WHETHER THE HABITAT WAS BEING AFFECTED. ANALYZING HISTORICAL DATA SETS WILL ALLOW ONE TO IDENTIFY WHERE DEPTH-TO-GROUNDWATER HAD CHANGED, BUT IT WOULD BE NEARLY IMPOSSIBLE TO ATTRIBUTE ANY HABITAT CHANGE TO CHANGES IN DEPTH-TO-GROUNDWATER. LAND USE INFLUENCES AND THE AVAILABILITY OF OTHER WATER SOURCES (E.G. IMPORTED WATER RECHARGE) MAY BE AS GREAT (OR GREATER) AN INFLUENCE ON HABITAT THAN DEPTH-TO-GROUNDWATER.

4.5.1 Summary of Problem

Include that new species are arriving all the time and so need a vigilant process to find and identify problem species.

MERKEL

Response: Made changes to text.

Add to text: A coordinated effort over the entire watershed is required to address this problem and continue efforts to identify and assess new introductions.

Contributing Elements:

- Arrival of new species

MERKEL

Response: Made changes to text. This is also covered in long-term action recommendations under the 5th bullet regarding response to new introductions.

Add to text:

The watershed-wide use and availability of exotic species that cause the reintroduction of known exotic species as well as the introduction of new exotic species to the system.

4.5.2 Summary of Problem

At end of paragraph include that watershed planning needs to consider the value of their lands not only for local processes but also for their importance in supporting regional ecosystem processes.

MERKEL

Response: Made changes to text in Section 4.5.3, Summary of Problem.

Add to text: Add to the end of the last sentence.

Since many of the beneficial uses.....it is key that these areas be considered for acquisition and restoration to serve multiple planning objectives, from local watershed processes to regional ecosystem processes.

(I'm thinking of this comment for the Santa Ana – Palomar Mountains Linkage, but this reminds me that there is no place in this document that identifies the role that the SM River plays in providing beach sands on the coast from the mouth of the river to Del Mar. We learned about this on the watershed tour that Camp Pendleton organized. Seems like this would be an important role to consider in making decisions about land use changes).

ANCHOR – add to intro paragraph, page

Long-term Action Recommendations:

Select and monitor key target species to determine the adequacy and usage of corridors
5th bullet: need to determine the best location first, in case the Border Patrol checkpoint is not the most appropriate place for a crossing

MERKEL

Response: The first section would be covered in the first bullet. I don't think that we should specify how they review the corridors for usage although we do specify that it should be adequate for all species.

Made changes to text regarding identifying I-15 crossing. This is covered in early action recommendations changes to Jenks. This barrier at I-15 required some lead in so several portions of the text were enhanced to do this.

Changes to text:

3.3.3 Corridors and Linkages

As indicated previously, the regional NCCP/HCP and the Santa Ana – Palomar Mountains Linkage that are in process, both regionally and throughout the watershed, have been developed with extensive research and efforts to identify and protect wildlife corridors and linkages within their planning areas. These corridors are not isolated within each planning area but linked regionally, extending beyond the boundaries of the watershed, and have been designed for a wide variety of species. For this reason..... Key to the corridor issues are the following concerns:

Corridors and linkages provide for the movement of species from one fragmented preserve area to another. It is important that these linkages are adequate for the purpose intended and that there are no barriers preventing connectivity along the corridor reach.

4.5.2 Corridors and Linkages

Summary of Problem

In the absence of corridors, habitats.....natural disasters. It is, therefore, important to ensure that these corridors and linkages are adequate for specific species and that they do not lack connectivity through barriers that impede the movement of wildlife.

Early Action Recommendations:

- Examine areas for lack of connectivity for wildlife movement along the corridor such as the barrier at interstate 15 that impedes the movement of wildlife. Determine the best location for wildlife to overcome this barrier and coordinate with Cal Trans on future activities to seek ways to mitigate or enhance crossings along large barriers such as the I-15 obstacle to animal movement.

4.5.3 Contributing Elements

Add

- Hydrological processes (e.g., peak flow volume and frequency, base flow volume, etc) must be maintained to maintain certain kinds of habitat necessary to support special status species.

MERKEL

Response: Looks good, add to text as a new bullet.

Long-term Action Recommendations:

Last bullet: ...sufficient to support a rich diversity of riparian vegetation and species communities ...restore natural vegetation within AT LEAST 1,000 feet...

Response: This section was rewritten to address other comments. Added the first portion of your comment but deleted the 1,000 feet because we have no reference justifying the specific number of feet required to accomplish the goals and this would be subject to the local terrain and adjacent land use. This was changed to “adequately”.

New bullet: assess the feasibility and benefits of converting existing channelized or concrete areas back to more natural riparian channels

MERKEL

Response: Looks good, add to text.

Changed text for the above 2 comments plus comment from City of Temecula to:

- Establish hydrological regimes sufficient to support a rich diversity of vegetation and species communities. This could be done by determining the feasibility of fish passages, vegetating causeways or dam removal, modifying road crossings, adequately restoring natural vegetation around streams and river to reduce erosion, removing exotic plants and animals, enforcing existing regulations protecting streams and stream vegetation, and pursuing cooperative programs with landowners to improve conditions in riparian corridors.

Assess the feasibility and benefits of converting existing channelized or concrete areas back to more natural riparian channels.

New bullet: Identify how changes in watershed processes are related to habitat loss and degradation

MERKEL

Response: We can already make the links between watershed processes and habitat loss and degradation but this probably needs to be communicated through education and outreach.

Add to text: Add to end of Long-term Action Recommendations

Develop an education and outreach program to communicate the links between watershed processes and elements such as habitat loss and degradation.

4.6.1 Contributing Elements:

Last bullet: describe the atypical development pattern that you have in mind.

KTUA

- The atypical development pattern within the SMRW that jurisdictionally disconnects the sources of many pollutants and stressors from the resources being impacted.

Early Action Recommendations:

Can we encourage the watershed committee workshop be held at SMER?

- Conduct a 2-day workshop, potentially at SMER, following completion ~~adoption~~ of the plan in order for plan contributors to reach consensus on how to organize the watershed council

4.6.2 Long-term Action Recommendations:

Encourage not only new development but also modification of existing development areas to increase pervious surfaces where appropriate

KTUA

- Through recommendation from the work group, promote policy, code and ordinance type changes within all of the land use jurisdictions in the SMRW to minimize the construction of and effects related to impervious surfaces in new developments and promote the removal and/or modification of impervious surfaces within existing developments where appropriate

4.7.1 Summary of Problem

The Plan should also encourage assessment of “non-pollutant” stressors (e.g. those not directly related to water quality). There should be a focus on assessment, monitoring, and management/conservation for hydrologic, geomorphic, habitat, and other management (e.g. recreation)

KTUA

... Having a current comprehensive inventory of this data that identifies basic bibliographic or metadata information about the various data sets would be a logical first step as this will help identify data gaps, both spatial and temporal. The types of data to be included in this effort should include not only water quality related parameters, but also non-pollutant data related to hydrology, geomorphology, habitats, and any other parameters deemed necessary to effectively manage and conserve the resources within the SMRW. Once developed and ongoing management responsibility is defined, additional tools to access and manipulate these data can be developed for the purposes of further various watershed management activities and goals.

Early Action Recommendations:

KTUA Add as modified

- Establish “trigger points” for analyzing monitoring data to determine when a management response is required
- Establish clear responsibilities for the monitoring, management, and analysis of the data, including any ~~and~~ required management response
- Establish “trigger points” for monitoring candidates under which response is required
 - Establish clear responsibilities for monitoring, management, analysis, and response

Long-term Action Recommendations:

Edit: “a project database developed in 2001 *by SDSU Field Station Programs* provides a structure for organizing.....”

Edit: “a project database developed in 2001 *by SDSU Field Station Programs* provides a structure for organizing.....” edit as follows – but include as first Early Action and delete from Long-term action. The long-term action was not written by me, is not written as an action, and is redundant with the first Early Action.

KTUA

- Support and augment the efforts initiated by the USMCB, ~~SMER~~SDSU Field Station Programs, and the USBR in developing and populating an inventory of the various projects, planning and research efforts occurring throughout the SMRW. The database ~~A project database developed in 2001~~ provides a structure for organizing ongoing and historic datasets and making it easily available to

watershed managers on the web. The database can be populated with published papers, reports, and is linked to online datasets housed at the SDSU or on the servers of partnering organizations. The database is compatible with other national and state databases and can be made available to partners or the public via the web

4.7.2 Early Action Recommendations

4th bullet: continue AND ENHANCE existing programs at SMER.....public tours TO INCLUDE WATERSHED INFORMATION AND MATERIALS

4th bullet: continue AND ENHANCE existing programs at SMER.....public tours TO INCLUDE WATERSHED INFORMATION AND MATERIALS

Changes made

- Continue and enhance existing programs at SMER, such as the K-12 programs, university classes, and educational public tours to include watershed information and materials

Table 5-1 Under beneficial uses, SMER and SDSU are listed as separate entities. SMER is one of 4 field stations operated by the SDSU Field Station Programs.

Comment noted.

Appendix C

Figure 1-5: These rainfall data are not accurate. For a watershed management plan, the amount of rainfall reported should at least be in the right ballpark. This map reports rainfall totals that are roughly twice the actual amount in some areas.

KTUA

(We sourced the data used, which was the best made available to us. If stakeholders have better data, then they can update those as initial management efforts outside this contract)

Figure 2-1: Still have not included the 2 existing SMER hydrological monitoring stations on this map that are located in critical monitoring locations for the watershed. We have provided Anchor with the GPS locations of these two stations as comments in previous drafts. Please contact us this information.

KTUA

These have been integrated and the graphic updated.

Figure 3-2: Why don't you show the mainstem as a 303(d) impaired water body on this map?

KTUA

Figure has been modified to portray the listings in a more legible manner.

Figure 5-2: You have tow colors demarcated as the same thing: one is called Western Riverside County Multiple Species Habitat Conservation Plan and the other is called W. Riverside County MSHCP

KTUA

Figure has been modified to differentiate what was intended with the two categories.

Figure 5-3: The eastern portion of the SMER is listed as 11-25% impacted but contains no development. It does contain about 50% granite boulders and may be the reason that it is listed in this category. Please provide some information about what the rating means.....

KTUA

We provided some information to SDSU on this topic and made one edit to the GIS data and updated the figure accordingly. Again, as stakeholders find data errors in the initial planning-level assessment they will need to update the database to ensure the best available data is used in future management activities.

General Comments:

Throughout the plan, please list SDSU as SDSU Field Station Programs or (SDSUFSP). In addition, the following information should be explicitly stated or integrated (where appropriate) in the Plan. Some of these points have already been addressed, but many have not.

ANCHOR

Recommended addition made in Introduction, page 3.

Understanding the concept of the watershed as holistic in nature is fundamental to successful watershed management planning. The inter-relationships between hydrology, water quality, water availability, groundwater, biological resources, and land use are complicated and in many cases not completely understood. It is important to acknowledge that reaching one watershed goal may be at the expense of another, therefore achieving balance in the prioritization of actions and seeking understanding of the implications of certain activities will help ensure a watershed that provide the functions and values to all its inhabitants. A few examples of the interaction within the watershed environment will underscore the importance of these relationships. The examples below are a few examples of the consequences of taking one action on another watershed attribute.

- Providing the water necessary for human use (agriculture, commercial, and drinking) may critically reduce the water available for the survival of animal species
- Clearing for fire breaks may result in colonization of invasive vegetation species
- Increases in invasive vegetation may lead to increased populations of invasive animal species and a decline in native plants and animals
- Wildlife corridors and land use designations may conflict, resulting in a loss of connectivity of habitat and inappropriate location of development in flood-prone areas
- Maintenance of natural riparian processes (such as flooding) must be balanced with the need to protect human development

- Reducing dependence on imported water should not come at the expense of groundwater availability or local water resources

The Study Team that assisted the stakeholders in creating this WMP used a compilation of existing data and no new studies or research were undertaken. This WMP is a guide for stakeholders to continue watershed planning efforts, and is intended to be updated periodically to include new research and findings, to revise land use plans as they are adopted, and to modify the actions recommended for action. This WMP can be used to assist stakeholders who wish to pursue grant proposals.

This WMP is not a step-by-step implementation strategy. Recommended time frames are indicated for the action items, but stakeholder interest, available finances, and organization will be large influences on what actions are taken and when. This WMP is not comprehensive, that is, it reflects the highest priorities formulated by the stakeholder working group at the time of its development. Further studies must be undertaken to develop new strategies, priorities, and actions.

Water Resources

- Maintain beneficial uses
 - Improve surface water quality to meet water quality objectives
 - Reduce loading of pollutants in the watershed, particularly of priority pollutants
 - Remove listed waters from the 303(d) list
- Reduce nuisance runoff
- Prevent illegal discharges/

Ecosystem Health

- Maximize biological resources values
 - Restore aquatic and terrestrial ecosystem health
 - Enhance wildlife habitat
 - Remove aggressive invasive species
 - Reduce/minimize ecosystem stressors
 - Enhance riparian habitat
 - Maintain and improve habitat connectivity
 - Reduce impacts of the urban/wildland interface
 - Allow for human land uses and recreation where deemed appropriate
 - Reduce negative effects of unnatural fire events
- Integrate watershed plan with existing NCCPs
 - Identify gaps in planning

Physical

- Increase groundwater recharge
- Reduce channel erosion
- Reclaim stream network/daylight storm drains
- Reduce flood damage, protect municipal infrastructure
- Reconnect floodplain

Community

- Eliminate trash/debris
- Create protected and recreational open space interconnected with other regional open spaces
 - Provide passive recreational opportunities where consistent with other goals
 - Maintain trail system
 - Improve aesthetics
- Increase citizen awareness and involvement
- Create education program, targeting communities, and specific land use types of concern

From Christine Moen:

Section 2.4.1

You're missing listed species. If you want the list to be complete, I recommend that you have someone from the U.S. Fish and Wildlife Service and Calif. Dept. Fish and Game review the document. Those that I can think of that should be added include:

Munz's Onion: (*Allium munzii*) – Skinner Management Area
Slender-horned spineflower (*Dodecahema leptoceras*) – Temecula-Murrieta M.A.
Vail Lake ceanothus (*Ceanothus ophiochilus*) – Temecula-Murrieta M.A.

MERKEL

Response: Will make appropriate changes and will add any additional listed species.

Bald eagles have nested at Lake Hemet in the past – Vail M.A.

MERKEL

Response: Would need a reference. The only CNDDDB record is at Lake Skinner.

Breeding least Bell's vireo and southwestern willow flycatcher have been documented in both the Skinner and Vail M.A.'s.

MERKEL

Response: I would need reference of the flycatcher at Skinner and Vail and the vireo at Skinner. Checked CNDDDB records and will make some changes to text. Vireo was found in small numbers at Vail Lake and Murrieta Hot Springs.

2.4.2

Beaver also chew up and degrade valuable nesting habitat for riparian species.

MERKEL

Response: Very true will add to text.

Table 2-2: Land Management

“Roy Shipley Reserve” should be “Southwestern Riverside County Multi-Species Reserve” (you should have the GIS data of the entire 13,619 acre Reserve that I sent to you).

ANCHOR – Text modified as requested.

Table 2-3

What do the parentheses signify?

ANCHOR -- A negative change in that category over time.

Hopefully, you’ve included the Multi-Species Reserve (13,619 acres), Lake Skinner County Park, Wilson Valley Conservation Area, and Johnson Ranch Conservation Area into your estimates of conservation lands.

KTUA -- yes

3.5.2

The Southwestern Riverside County Multi-Species Reserve will soon open its Interpretive Center located within Lake Skinner Regional Park. The Center already offers programs to school groups regarding the natural history of the area and ecologically-based classes. More information can be found on our website at www.multispeciesreserve.org.

ANCHOR – Text modified as requested.

3.5.3

Wildfire should be a component of the WMP. Wildfire significantly impacts many of the very attributes of a watershed, namely runoff, erosion, changes in water chemistry, etc. It’s important to note that one of the main reasons that the wildfires of 2003 were so devastating is probably due to the past fire suppression policies of California. More information can be found by contacting Dave Minnich at U.C. Riverside. You say there are “actions relative to wildfire management that are being taken elsewhere”: What are those actions? You may want to list them.

ANCHOR

Wildfire discussion is out of scope for this WMP; we included this minimal discussion to make the document more broad-based. However, I will try to list some of the actions taken elsewhere. Without research and stakeholder input, discussion of fire suppression is inappropriate for the Study Team to undertake.

4.1.1

Why is erosion within the Skinner M.A. not considered an “issue”? Is it because you would expect all erosion and siltation problems to be absorbed by Lake Skinner?

The 10,000-acre “Mountain Fire” of October 2003 has resulted in severe erosion problems within the Skinner M.A. In addition, there has been significant land development in this region in recent years.

ANCHOR -- Skinner was not included in the stakeholder discussions.

I’ve never seen Temecula Creek flow directly below the Vail Lake Dam – what benefit would a guage be there?

Bullet deleted

5.1

If “SMRW” is an acronym for Santa Margarita River Watershed, the sentences that identify the watershed as “struggling” (to implement management or realize the vision) don’t make sense. A watershed cannot struggle. People struggle.

ANCHOR – Text modified as requested.

6.2

Christine Moen: Southwestern Riverside County Multi-Species Reserve.
Text modified as requested.

Please be aware that our Reserve is not the Reserve that will be created by the larger “Western Riverside County Multi-Species Habitat Conservation Plan (MSHCP)”. We are merely a subset of that larger plan.

Metropolitan Water District

1. Comments on the DRAFT Santa Margarita River Watershed Management Plan

Comments received on February 3, 2005 Section 1.3.2-Development of Actions-Pages 4-5

This section refers to Table 1-1 and Table B- I (the tables in Appendix B are not individually numbered). Without an Executive Summary describing what information will be provided in the WMP report, it is unclear if the tables were to direct initial work for the WMP, what issues are of current concern, and if the issues will be addressed in the WMP. Additional clarification for Table 1 and the tables in Appendix B may help avoid confusion regarding the focus of the WMP.

ANCHOR

The tables found in Appendix B have been labeled.

The text has been modified to clarify the purpose of and intent of the tables.

2. Section 1.3.3-Watershed Management Planning Tools, Watershed-specific Studies-Page 6

Reference is made to the TAs (Technical Appendices) on the Santa Margarita River Watershed website. However, this term is not used on the actual website, which made location of the specific documents difficult. The reports are actually listed under the "Deliverables" section.

ANCHOR

The Website will be undergoing some changes to make document retrieval easier. As part of the change, the website will be updated to use the term "Technical Appendices" and/or "Technical Studies" in place of "Deliverables."

3. Section 2.3. 1 -Water Quality-Page 11

"The water quality data provided by annual monitoring is generally reported within each county... a synthesis of the available data can give an impression of the surface water quality by management area (see Figure 3-2, Appendix C)." Figure 3-2 graphically identifies 303(d) Impaired and Monitored Water Bodies; eight monitoring locations and five water bodies are identified. The RWAR has identified and/or reported the results from numerous water quality sampling episodes. A concise summary of this information is not provided in the WMP. At a minimum, the following information must be provided: the constituents that were sampled for, the results of sampling - minimum, maximum and average concentrations, sampling frequency, detection limits, and method of analysis. This basic information is required to determine where data gaps exist and the next logical plan of action for water quality monitoring based on factual data. Metropolitan provided water quality information for Diamond Valley Lake and Lake Skinner; however, this data is not presented in the report.

ANCHOR

The specific data/information requested was not made available to the Study Team from all sources during the watershed assessment process. Therefore, the County and the Study Team made a decision to generalize the results to avoid drawing attention to the lack of responsiveness of individual stakeholders. While this weakens the plan to some degree, the Study Team and County believes it was important to maintain a cooperative spirit, as future modifications of the WMP will occur. As this first step in creating a watershed management plan for the SMRW is drawing close, the requested information will need to be inserted at a later date once all stakeholders have provided their data. Further, the Assessment Report has a discussion of the water quality data relative to MS4/NPDES monitoring requirements.

4. Section 2.3. 1 -Water Quality, Skinner Management Area-Page 12

Water Quality data that Metropolitan provided for the Santa Margarita River Watershed

Management Plan does not refer to constituents as "toxic organics" or "toxic inorganics". Use of the word "toxic" misrepresents the data provided and misleads the reader. The Occupational Safety and Health Administration (OSHA) has specific parameters to evaluate if a substance is toxic. One of the criteria states "a chemical that has a median lethal dose of more than 50 milligrams per kilogram but not more than 500 milligrams per kilogram of body weight when administered orally to albino rats weighing between 200 and 300 grams each". Further, compounds should not be referred to generally as "toxic contaminants".

Substances are determined to be toxic based on concentration, type of exposure, and exposure time. Additional references to this information can be found in OSHA 29 CFR 1910.1200 App A.

ANCHOR

Requested change to text made.

5. Section 3.2. 1 -Surface Water-Page 28

"Water quality on a watershed-wide basis is difficult to characterize due to a lack of consistent monitoring data. Generally, the water quality in the upper watershed (Vail, Skinner, and Diamond Valley) is good." A data analysis or summary of data available should be presented to support a lack of data. Please specify the parameters that define "good" water quality.

ANCHOR

A data summary and analysis is discussed in the Watershed Analysis to the extent possible given the available data. Please refer to that document for the water quality analysis, as the WMP is intended to use data that has been previously presented, rather than repetition of the analysis. Additionally, the Watershed Analysis discusses the lack of data. The characterization of "good" water quality in the upper watershed reflects the

lack of any exceedences found by the Riverside County Permittees, as well as any other documented water quality problems.

6. Section 3.2.1.2-Beneficial Uses and Regulatory Requirements-Page 29

"An issue of concern voiced by several stakeholders is that the water quality standards set by the Basin Plan for SDRWQCB's region do not accurately reflect the existing conditions in the SN4RW." Please provide additional information. Specifically, a comparison between water quality standards set by the SDRWQCB and the current watershed conditions.

ANCHOR

This statement is included to address the specific request of the City of Temecula, which has on-going concerns related to the standards listed in the Basin Plan. The WMP has been modified to provide additional information, and in conjunction with the Watershed Assessment, the WMP adequately discusses the issues surrounding the differences between the Regional Board and the Riverside County Permittees relative to the beneficial uses.

7. Section 4.3-Water Resources-Groundwater, Contributing Elements-Page 47

"Required public water supply monitoring is infrequent and focuses on a limited number of drinking water parameters." For a listing of constituents and the sample collection frequency for all drinking water sources, see Drinking Water Regulations in the California Code of Regulations, Titles 17 and 22. Public drinking water sources are typically measured for hundreds of contaminants each year.

ANCHOR

Comment noted. No change required.

8. Section 4.4.1 -Reduce Dependence on Imported Water-Page 50

The "disadvantages associated with the reliance on imported water supplies" have not been qualified. Please provide clarification to support the relationship between "water supply interruption due to drought, earthquake, or environmental restrictions" and the vision of the WMP. Documentation supporting negative environmental impacts associated with the development and transport of imported water should be provided. Data has not been presented to establish baseline levels of total dissolved solids within the native waters of the watershed to the amount in imported water to conclude adverse water quality effects have occurred. A discussion of all possible sources that could contribute to an increase of total dissolved solids with the watershed should be provided. Lastly, the relationship of imported water to failed private wells has not been documented.

ANCHOR

It is common knowledge that the San Diego region imports approximately 90 percent of its water. Therefore, any interruption of that supply will be disadvantageous to the region's population. Reducing dependence on imported water was a stated goal of the WMP as developed by the Stakeholders during the process. The topic of TDS found in imported water can be found in the Watershed Analysis (e.g., p. 101, 168, 275). Since, the current contract with the Study Team is complete, this topic should be readdressed in future reiterations of the WMP.