Appendix 1B – Consultation Committee
Response to Comments Table
In short, sediment should be considered a pollutant (under water chemistry) and have its own dedicated category. To have the original writing, it is as follows:

My primary comment is that sediment should be considered a pollutant (under water chemistry) and have its own dedicated category. The reduction of sediment transfer should be a priority goal. Not only do partially dissolved solids impact water quality, but they serve as a sort of thermometer, indicating the health of our watershed.

While sediment transfer is a naturally occurring phenomenon and provides an essential ecosystem value, like anything else, an excess of sediment indicates a system that is out of balance. I am clearly not a scientist but my direct experience in this watershed and contact with professionals working on the front line of this issue has convinced me that we are seeing an excessive amount of sediment transfer. This is a manifestation of other, cumulative impacts to our environment, such as the loss of topsoil, which is the result of methods of (poor) land management and the installation of hardened structures like roads, and culverts which have altered the water flow regime.

The fact that our climate is warming and we are seeing an increase in water vapor in the atmosphere as a result means that, in future, we can expect the unexpected. Impacts to our infrastructure could be dramatic. Our already flashy system will likely become more flashy, with the corresponding erosion that will bring. It seems essential that we collect a solid base of data from the watershed to assist proactive planning.

In most cases, data specific to sediment and sediment transport is not collected under the monitoring programs. However, data related to physical habitat, which scores stream reaches according to the Creek Rapid Assessment Method, is collected at various locations throughout the watershed and was included in the assessment of priorities. The District has identified potential areas impacted by hydromodification within the Upper SMR WMA and has projects planned to address one or more of these locations. The projects will be considered within the context of the WQIP under the B.3 section, where strategies and delineates are determined.

The Permit provides provisions for compliance with Land Development requirements through offset projects, see Provision E.3.c.(3). The District and Parties will consider the applicability of the Provision to the needs of their individual jurisdictions and may pursue off-site compliance approaches, such as mitigation banking, in the future. These programs would be dependent on identification and availability of potential projects, which may be identified within the Watershed Management Area Analysis, and the demand for off-site alternative compliance options (i.e., the needs of the development community). This approach will be considered further upon development of WQIP strategies.

The District and other Parties are considering development of a Watershed Management Area Analysis (WMAA) as part of WQIP development. The WMAA is included as a potential strategy (DEC-7) within Appendix G.

The District has in fact constructed several LID pilot projects within its facility and has collected and assessed various related data sets for the projects. Understanding that “green streets” is a broad term, it would be an option within several of the Potential Strategies listed in Appendix 2G (see DEV-6, DEV-13, DEV-14) and will be considered moving into the selection of strategies during the next phase of WQIP development.

Although listed in more broad terms, several structural controls (DEV-6, DEV-13, DEV-14) have been included in the list of Potential Strategies in Appendix 2G. These will be considered moving into the selection of strategies during the next phase of WQIP development and could be constructed as pilot projects where appropriate.

The Parties may consider incorporation of green infrastructure as part of their general plans as revisions are made to these plans. These actions would depend upon whether or not the agency has identified green infrastructure as a viable strategy to address water quality concerns within their jurisdiction and whether there is general support within the organization to warrant a change to the general plan.

Under Provision B.2.e, retrofitting projects in areas of existing development are required to be included in the list of Potential Strategies, included as Appendix 2G. There are several retrofitting concepts included in this list that may be considered during the selection of strategies during the next phase of WQIP development. This specific concept is included under ED-7.
9 Teri Biancardi 9/30/2016 Recommended Strategy: Bioengineered stream restorations should be implemented wherever erosion has occurred as a result of hydro-modification. Permitting can be facilitated through the formation of a stream restoration team consisting of representatives from each jurisdictional agency, and use of existing streamlined permitting for small habitat restorations which can also file categorical exemptions of CEQA. Under Provision B.2.e, stream, channel, and/or habitat rehabilitation projects are required to be included in the list of Potential Strategies, included as Appendix 2G. There are several of these concepts included in this list that may be considered during the selection of strategies during the next phase of WQIP development (e.g., ED-7).

10 Teri Biancardi 9/30/2016 Recommended Strategy: Educate flood control and city public works staff on erosion bmps, Filterx is a leader in the field and Craig Kolodge will happily give presentations. The District and other Parties implement internal training programs for agency staff to raise awareness and understanding of urban runoff and stormwater. As appropriate, the training includes education on sediment/erosion control BMPs and materials management. Increased outreach and education may be considered as a strategy during the next phase of WQIP development. Within the potential strategies listed in Appendix 2G, ED-38 includes development of a municipal field BMP manual for public employees that would be used as a training tool if implemented.

11 Teri Biancardi 9/30/2016 Recommended Strategy: Offer education to Home Owners Associations who manage large tracts of land which can both suffer from and cause watershed impacts. As part of their public outreach programs, agencies may consider incorporating outreach to homeowner’s associations as part of their strategies in the next phase of WQIP development. This approach has been included in the list of potential strategies in Appendix 2G, see ED-28.

12 Teri Biancardi 9/30/2016 Recommended Strategy: Utilize existing resources on stormwater management like Georgetown Climate Center’s Green Infrastructure Toolkit and the EPA’s Sustainable Communities technical grants for Green Streets. If the Parties select green streets as a viable strategy to address their highest priority water quality conditions, these resources may be consulted as the strategies are developed and implemented.

13 Teri Biancardi 9/30/2016 Prohibiting invasive species is a laudable goal but very difficult to achieve, more detail is required for this to be a realistic strategy. At this time, the list provided is only "potential strategies", some of which are broad in order to allow for flexibility as the Parties develop and identify the key strategies they will use to address the highest priority water quality conditions. As the strategies are selected during the next phase of WQIP development, the details will be developed and included as part of each agencies’ Jurisdictional Runoff Management Plan.

14 Teri Biancardi 9/30/2016 Also, the permit says that non-stormwater is prohibited from entering the MS4. There is an existing condition - non-stormwater is entering the MS4. The Permit requires the effective prohibition of non-stormwater discharges through implementation of programs under Provision E.2. (Illicit Discharge Detection and Elimination). Programs required under this provision are currently being implemented by the Parties and will continue. If determined effective and appropriate, these programs may be leveraged as strategies to address the highest priority water quality conditions during the next phase of WQIP development.

15 Teri Biancardi 9/30/2016 "Areas of excessive erosion (resulting in sediment transfer); Parts of Bundy Canyon creek, Cale de Oso Oro, Miller creek, Murrieta; Meadowview Stream, #14 reach in master drainage plan, Sky Canyon, Warm Springs (by pipe in Warm Springs Preserve) and also downstream by Murrieta Creek, a few sites in Cole Creek, a park in Temecula with drainage impacting playing fields (can’t remember the name right now.) The District is currently working with Sierra Club to investigate these areas to better understand the extent of the erosion problems throughout the watershed. Areas that the District is aware of at this time have been prioritized for projects designed to address erosion and the effects of hydromodification.

16 Laurie Corea 12/1/2016 Define "sensitive receiving waters" (Second to last paragraph in HPWQC section). The definition was added the first time "sensitive receiving waters" is mentioned, in Section 2.4.1

17 Rick Neugebauer 12/2/2016 Pg. 2-3: 3rd line: "Team RCD before Parties in parentheses. No change. TEAM RCD is not referenced in the document.

18 Rick Neugebauer 12/2/2016 Pg. 2-4: last paragraph: Insert "of" between "priority" and "water quality conditions for the watershed." No change. Priority water quality condition is consistent with permit terminology.

19 Rick Neugebauer 12/2/2016 Pg. 2-5: 1st paragraph, following "During implementation, adaptive management will be utilized to assess progress and make adjustments as needed": "--What is our threshold? Of water quality? Text modified. The adaptive management process will assess progress towards goals, which will be developed in the next phase (B3 Section).

20 Rick Neugebauer 12/2/2016 Pg 2-6: 2nd to last paragraph, in response to "The functional uplift analysis identified that the aquatic life beneficial use category was of higher importance to address. " --Whom identified? Text modified. Through the functional uplift analysis, the Parties identified...

21 Rick Neugebauer 12/2/2016 Pg 9: Table 27 Functional Uplift Evaluation for the Priority Level A Conditions in the Upper and Lower SMR WMA. "How much aquatic life in Upper?" The aquatic life use category is representative of WARM, COLD, WILD, RARE, BIOL, SPWN beneficial uses, all of which are beneficial uses present within the Upper Watershed as identified in the Water Quality Control Plan for the San Diego Basin (Basin Plan).

22 Teri Biancardi 12/4/2016 1. The draft does not reach the level of the holistic approach to watershed monitoring and health that I would hope to see. It reads as though participants are concerned that their policy recommendations will obligate them to commit money and resources they do not have, rather than what is best practice for obtaining and maintaining a healthy watershed. This is reflected in the statement "that the RCFWCWD has limited land use authority within the watershed." It is a given that RCFWCWD has constraints on the sort of projects it can pursue on land not under its authority, however, streams do not re-extend property lines, and as such the entity best placed to keep across watershed health should be the District, as there is an already existing department of Watershed Protection. Language was added to clarify the role of the RCFWCWD within the watershed. Their role has been and will continue to be to coordinate activities within the watershed amongst the Parties and various stakeholders. Through the Water Quality Improvement Plan, they will continue to help coordinate watershed activities in support of the highest priority water quality conditions.

23 Teri Biancardi 12/4/2016 2. Further, I would suggest that in order to alleviate the concern that participants will be held to an impossibly high standard, the document include a mission statement with goals and objectives that all parties are moving towards, rather than being compelled to achieve in the immediate future. Once priorities are established through the B2 section, it may be appropriate to then develop a mission statement to guide the development of goals, strategies, and schedules. This will be considered as we move forward with the B3 section.
24 Teri Biancardi 12/4/2016 2. While the draft indicates that information is still being gathered in the upper SMR watershed on physical habitat, why should that prevent it from being selected as an HPWQC? It would seem that poor physical habitat would be for pursuing improved water quality. The addition of bio-indicators to the TMDL process (SMRNIP grant group) shows that improved water quality is correlated with viable physical habitats.

Response: Due to TMDLs and other regulatory policies (e.g., Statewide Trash Amendments), other problems have been identified that must be addressed. Physical habitat has been considered within a robust prioritization process and addressing these concerns may support attainment of aquatic life uses. There are potential strategies presented that would support addressing physical habitat issues if implemented.

25 Teri Biancardi 12/4/2016 4. There is no mention of sediment as a category that impacts beneficial uses. According to the EPA, sediment is the most common source of non-point pollution in US surface waters. Among the long list of negative impacts, it also transports nutrients which contribute to the HPWQC of eutrophication. Alternatively, erosion (affected by grading, channeling, and disruption) could be a category with sediment as the pollutant.

Response: Pollutants with the potential to impact aquatic life have been updated to include sediment.

26 Teri Biancardi 12/4/2016 5. Native flora and fauna as well as connectivity should be addressed, in other words look at the geography for connectivity and sediment flow - and then monitor and record the physical, chemical and biological health of these watercourses.

Response: This will be considered moving forward as we develop monitoring plans and the Watershed Management Area Analysis (if developed).

Non-Army Corps Flood plan:
- Wildomar area: Baxter, Bundy.
- Murrieta: Greer Ranch, Scott road, Los Alamos, Warm Springs
- Clinton Keith, south to Vineyard Rd.
Army Corps Flood Plan:
- Murrieta/Temecula/County: Murrieta Creek
- Santa Gertrudis, Tecolote, Lake Skinner, Sky Canyon
- Temecula area: Ronald Reagan Pk, Lake Villages, Santiago, Meadowview, Ronpaugh
- Pechanga wash/Rainbow
- Anza/Aguanga (upper Vail Lake dam):
- Cahuilla creek and trib
- Temecula Creek
- Temecula Creek/Vail Lake area

Response: RFCWCD may support projects to address physical habitat in the future to further the protection of aquatic life uses within the watershed. RFCWCD is currently investigating potential sites and projects as suggested in the comments.

28 Teri Biancardi 12/4/2016 7. Could you add a definition of "trash"? Would it include unauthorized "chip and grind" sites, and marijuana "plantations," as can be found near creeks, like in SMER?

Response: A definition of trash was added to the document in Section 2.5.1. The definition of trash is consistent with the Statewide Trash Amendments.

29 Teri Biancardi 12/4/2016 8. As to strategies, you could consider forming a Watershed Council - the Bureau of Reclamation sometimes has grants to finance these - up to $100,000 - and you could include all the relevant agencies and other stakeholders to bring front line water shed information to the District, and forward potential restoration projects. This would aid in the building of productive partnerships and trust-building between the various entities involved in watershed management. Also, the EPA is a good source of best practices for stormwater management and adaptations (green stream).

Response: Text modified within the Potential Strategies Section to include this type of concept.

30 Teri Biancardi 12/4/2016 9. Also, and this will probably be covered in sections to come, the mitigation bank (Whammo?) is a great way to finance pilot projects, which in addition to stream restoration should include smaller but still significant projects, such as green streets, with curb cuts and rain gardens, etc.

Response: The WMMA (Watershed Management Area Analysis) is listed as a potential strategy and may be developed as part of the B3 Section (goals, strategies, and schedules).

31 Pablo Bryant 12/1/2016 ES: Insert "habitat conservation and connectivity" into the sentence describing watershed beneficial uses.

Response: Because those issues are not Basin Plan identified beneficial uses, we inserted a sentence following the sentence describing beneficial uses to state that those are important issues for the Parties in the watershed.

32 Pablo Bryant 12/1/2016 I see where the watershed is referred to a few times as "non-perennial", do hydrologists really consider this watershed to be non-perennial given the consistent artificial perennial flow of water in the lower region?

Response: Waterbodies in the Upper SMR are generally non-perennial during dry conditions, and that is also sometimes the case in the Lower watershed.

33 Pablo Bryant 12/1/2016 Lastly, I thought that was trash was deemed to be a problem on the lower portions of the Murrieta and Temecula creeks, as well as at the SMR confluence. Can we add "trash" to these areas on the last two graphics? I believe this to be especially important given the current state of these areas and the potential impacts of the Altar and Western Bypass projects in the future.

Response: As noted in Tables 2-3 and 2-4, trash was noted as a priority water quality condition in these areas. Through the highest priority water quality conditions selection process, trash was not identified as the highest priority within these reaches.

34 Kyle Cook 12/8/2016 ES: 1. The term "reach" is used often and I think kind of loosely. It would help to define what is meant by this term and how it is used in the WQP.

Response: Added text to the Executive Summary, Priority Water Quality Conditions section to clarify the term "reach".

35 Kyle Cook 12/8/2016 ES: 2. I understand that the categories of Beneficial Uses (BU’s) are similar/related BU’s grouped together to streamline the prioritization and decision-making process. I recommend that the categories of BU’s be defined in the WQP and explain why this approach is used and why it makes sense. The San Diego Basin Plan only contains specific BU’s and not categories.

Response: Beneficial uses and their categorization are described in more detail in Appendix 2A, the Ranking System Approach.

36 Kyle Cook 12/8/2016 ES: 3. Ranking of the highest priority water quality conditions in the WQP starts with a selection of where there is evidence of flowing MS4 outfalls that discharge to the receiving water. This is a practical approach and a sensible starting point, however, I think it would also be helpful and useful to speak to the potential fate of other MS4 outfalls that do not currently discharge to receiving waters. For example, why did you use the current decision process and what will later be done with discharges that are not currently ranked a priority?

Response: Text added to the high priority water quality conditions discussion referring to adaptive management. The adaptive management process will be further fleshed out in Chapters 4 and 5 of the document, to be developed later in the process.