December 5, 2016
WQIP, Provision B.2 Submittal
Priority Water Quality Conditions
Comments

To whom it may concern,

From the outset I would like to reiterate my appreciation for the structure of this process which aims to utilize the best science possible while also seeking local knowledge and input. Also, my gratitude at being asked to participate on the advisory panel. It’s clear that an enormous amount of effort, expertise and thought has gone into this assessment.

I do have a few comments.

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 RCFCWCD has limited land use authority within the watershed.” It is a given that RCFCWCD has constraints on the sort of projects it can pursue on land not under its authority, however, streams do not respect 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.

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.

3. 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.

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, channelling, and disruption) could be a category with sediment as the pollutant.

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.

6. Geographical areas: (from the north to South):

**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 Park, Lake Villages, Santiago, Meadowview
  
  Roripaugh
  
  Pechanga wash/Rainbow
- Anza/Aguanga (upper Vail Lake dam):
  
  Cahuilla creek and tribs
  
  Terwilleger
  
  Temecula Creek/Vail Lake area

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?

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. (greenstream)

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.

Thank you for taking the time to read this.

Best regards,

Teri Biancardi