Appendix G
Response to Comments on Public Review Draft
Response to Comments on the Santa Margarita Integrated Regional Water Management Plan (IRWMP)

All comments received are denoted by an italicized font with a response immediately following in a normal font.

1.0 Riverside County Flood Control and Water Conservation District, Jason Uhley, Comments and Responses

General Comments on Document

1.1 Prior Plans have focused on the lower watershed, which is in a wetter climatic area and has perennial stream flows. This plan focuses on the upper watershed, which is ephemeral, and semi arid. Much of the discussion still seems geared towards the lower watershed, we need to make sure that this study describes the upper watershed. I’ve made notes below where I saw specific areas that need to be tuned.

Comment noted.

1.2 Should do a Global Search on "Murrieta Creek Phase 2". Where ever it is used, verify whether the title is correct. Most references to Phase 2 were actually in the context of a discussion of the full project. The full project name should be used in those sections.

Comment noted. References to either the full project or only Phase 2 were made consistent throughout.

1.3 Were there ever steelhead in the UPPER SMR? I would like to verify this. Seems like this is a lower watershed thing.


“The main Temecula Creek down to the top of the gorge was probably a major rearing and spawning area for steelhead before 1900. …intermittent streams can function as spawning areas if enough flow exists for eggs to hatch and juveniles to grow and migrate downstream to permanent stream or even coastal lagoon habitat that will sustain them. Such reproductive strategies were probably relatively more important in a southern stream like the Santa Margarita River where upstream areas are less able to support juvenile fish on a year round basis. However, the extended drying out of the Santa Margarita River renders this option difficult for the young
steelhead to accomplish, and argues for maintaining more perennial flow in the lower river and De Luz Creek as was historically available from the early 1900s and earlier.”

Where steelhead are mentioned, a reference to the ephemeral nature of the upper watershed was added to the document.

**Section 1**

1.4 Introduction, Page 2: There is a discussion of impairments due to "excessive sedimentation from development" and "channelization". These references should be deleted.

Comment noted. These references were deleted.

1.5 Section 1.6 - Add reference to RCFC&WCD Master Drainage Plan’s (MDPs)

Comment noted. Reference to RCFC&WCD MDP’s added.

1.6 Section 1.16 - Section discusses County and RCWD involvement in development, should also reference RCFC&WCD.

Comment noted. Reference to RCFC&WCD added.

**Section 2**

1.7 Section 2.2 - Verify that the lagoon is closed during dry weather, I had a conversation with Mike McCann at the RB last week and he implied that it was open under normal circumstances. (Recommend verifying with the Bureau).

Comment noted. According to the Bureau and Camp Pendleton conflicting information is available on whether the lagoon is typically open or closed during dry weather. The last sentence in that paragraph was deleted.

1.8 Section 2 - Discussion on climate - initial paragraphs seem to imply climate is wetter than it is (notes 45" of rainfall in mountains, etc). The discussions should remind the reader that the vast majority of the upper watershed is ephemeral and in a semi-arid environment. (Focus on average annual rainfall at 12" not extremes on mountains, note that annual evaporation exceeds precipitation by more than 40", etc).

Comment noted. Section 2.2.1 indicates the watershed is composed of a vast network of ephemeral streams. Section 2.2.2.1 indicates that the majority of the watershed has a Mediterranean climate with hot, dry summers. The section also describes that the majority of the watershed received 10.74 inches of rain on an annual average basis. Text regarding the rainfall amount in mountains will be relocated to the end of the section discussing rainfall with the emphasis that the majority of the watershed experiences less than 11 inches of rainfall in an average year. A discussion on evapotranspiration rates for the watershed occurs beneath table 2-1.
Evapotranspiration is an indicator of how much water plants need for growth and productivity and is therefore not compared to average annual rainfall.

1.9 The table presenting the average monthly temp and evaporation data is incorrect (I believe), the last column indicates that the annual evaporation rate is around 4", however that # is the average monthly evaporation rate, the annual total should be the sum of the months (around 50").

Comment noted. Table 2-1 was modified to clarify Eto and temperature are monthly averages for a year (an average month) while annual rainfall is the sum of monthly averages for a year.

1.10 Figure 2-3 assigns purple shaded land areas to "RCFC". I believe those are areas owned by the RCA. Please verify.

Comment noted. Colors were revised for RCFC and the Regional Conservation Authority. RCFC lands are minimal. Riverside County Conservation Lands were renamed Regional Conservation Authority.

1.11 Section 2.3.2.1.3 - Last paragraph: Discussion of approval of drainage and flood control projects, sentence should start with "Privately proposed" drainage and flood control projects, and end with "depending on who will ultimately maintain the infrastructure" - it currently states depending on where the facilities are, which is not always correct.

Comment noted. The sentence was revised accordingly.

1.12 Section 2.3.2.1.3 - Discussion should clarify that these are water quality issues related to water supply sources and not stream systems.

Comment noted. The title of Section 2.3.2.1.3 was changed to Surface Water Quality for Supply Sources.

1.13 Section 2.5.1.1 - Verify Phosphorous Water Quality Objective. I thought it was .1, .05 not .05, .025. Also recommend that the Rainbow Creek TMDL should be given its own subsection, as it fits awkwardly into discussion. Also should focus on need to verify appropriate nutrient targets for the streams.

With regard to the phosphorous water quality objective, the San Diego Basin Plan, footnote “a” to Table 3-2 states “Threshold total Phosphorus (P) concentration shall not exceed 0.05 mg/l in any stream at the point where it enters any standing body of water, nor 0.025 mg/l in any standing body of water”.

Regarding the Rainbow Creek TMDL, the second and third paragraphs (along with the bullet points at the end of the third paragraph) will be moved to a new section just after 2.5.1.1, creating a new section, Section 2.5.1.2 Rainbow Creek Nutrient TMDL.
1.14 Section 2.6 - Recommend deleting paragraph on fecal coliform bacteria as there is no listed impairments.

Paragraph was deleted.

1.15 Section 2.6 - Verify that there were ever steelhead trout in the UPPER Santa Margarita River. The ephemeral nature of the system makes me doubt whether that discussion is appropriate to our plan for the upper river.

Please see response to 1.3 above.

Section 3

1.16 Section 3.3 - Last bullet - change per my prior recommendations (broaden it to cover global water quality monitoring needs)

Jason Uhley’s previous edit: Promote development of tools and methods to effectively monitor and assess key stream systems.

We the proposed change we are losing “monitoring health of aquatic organisms in the watershed”. Although implied in the revised objective above through reference to “key stream systems”, we need to be more explicit and include this language so that we can tie future stream restoration and monitoring programs back to this objective, particularly to support key species.

CDM revised the sub-objective as stated, but add “including monitoring the health of aquatic organisms”.

1.17 Page 3-12 Remove completion date for Murrieta Creek - This one is a MUST.

Comment noted. Completion date deleted.

Section 4

1.18 Page 4-10 Reference to Murrieta Creek project should be to full project, not Phase 2

Comment noted. Edits made throughout section.

1.19 Section 4.2.3 - Should note that sources of nutrients include natural sources

Comment noted. The sentence will be revised to read: “Nutrients from both natural sources and from fertilizer application in agricultural areas have been an issue in the past and continue to be monitored and controlled within the region.”

1.20 Section 4.2.1.1 – Should include several minor edits to further clarify Strategy WS-4 as provided.

Comment noted. Section was revised accordingly
1.21 Section 4.2.2 – Strategy SUS-4 should include a reference to the Murrieta Creek Flood Control, Environmental Restoration and Recreation Project which includes Murrieta Creek Phase 2

Comment noted. Section was revised accordingly.

1.22 Section 4.2.3 – Strategy WQ-1a Should include several minor edits to further clarify Strategy WS-4 as provided.

Comment noted. Section was revised accordingly.

1.23 Section 4.2.3 – Strategy WQ-2 Should include several minor edits to further clarify Strategy WS-4 as provided.

Comment noted. Section was revised accordingly.

1.24 Section 4.2.3 – Strategy WQ-3a Should include several minor edits to further clarify Strategy WS-4 as provided.

Comment noted. Section was revised accordingly.

1.25 Section 4.2.3 – Strategy WQ-3b Should include several minor edits to further clarify Strategy WS-4 as provided.

Comment noted. Section was revised accordingly.

1.26 Section 4.2.3 – Strategy WQ-4 should be changed from a “Flood Management, Floodplain Management Strategies” to “Hydromodification Strategy”. The strategy description following should be changed accordingly

Comment noted. Section was revised and WQ-4 is now the Hydromodification Strategy as recommended.

1.27 Section 4.2.3 – Strategy WQ-4 should be changed from a “Water Quality Protection and Improvement Strategy” to clarify it further as a Septic Tank Mitigation Strategy. The strategy description following should be changed accordingly

Comment noted. Section was revised and WQ-4 is now the Septic Tank Mitigation Strategy as recommended.

1.28 Section 4.2.3 – Strategy WQ-7a has nothing to do with Objective WQ-7

Comment noted. Section was revised to reflect Objective WQ-7.

1.29 Section 4.2.3 – Strategy WQ-7a, second paragraph is a duplicate of WQ-3a

Comment noted. Text has been edited by removing this paragraph from the WQ-7a description and discussion.
1.30 Section 4.2.5, first paragraph – Minor edits have been provided

Comment noted. Section was revised accordingly.

1.31 Section 4.2.5, Strategy FLP-1 – Text should be expanded further to clarify this strategy as suggested.

Comment noted. Section was revised accordingly.

1.32 Section 4.2.6.1, Strategy REC-1 – Minor edits have been provided

Comment noted. Section was revised accordingly.

1.33 Section 4.2.7.1, all bullets – Minor edits have been provided

Comment noted. Section was revised accordingly.

1.34 Section 4.2.7.1, Strategy LU-1 – Minor edits have been provided

Comment noted. Section was revised accordingly.

Section 5

1.35 Section 5 - WQ strategies need a lot of work. Some did not relate to the topic at all (hydromodification). Also need to take a look at the reference to steelhead again.

Section 5 does not contain a water quality strategy. Section 4, specifically Objective WQ-4 (minimize hydromodification of the watershed as development increases) contains a discussion on water quality strategies.

Water quality strategies were revised with input from RCFD.

See comment response 1.3 regarding discussion of steelhead.

2.0 EMARCD, Pam Nelson, Comments and Responses

Section 4

2.1 Table 4-2 for EMARCD Public Education and Outreach project include all community members, not just disadvantaged communities and youth

Comment noted. Table will be corrected to include all community members.

2.2 Table 4-2 RCA Acquisition project should include EMARCD as a partner, especially since we work in areas of the watershed that RCA does not and they are directed by the MSHCP and we are not. What about the Riverside Land Conservancy?

Comment noted. Only the project sponsor is listed. It is expected that the majority of projects will have numerous partners.
2.3 Table 4-2 Anza Groundwater project – remove potential residential development as it is to work towards a sustainable community by studying groundwater quantity and quality. I wonder if there is a way to say Anza area, including Aguanga because some of the area is called Aguanga that is in the Anza basin and then we could include projects for the Aguanga subbasin.

Comment noted. The project are will be defined through the efforts of the project sponsors. “Sustainable” will be added before residential development.

3.0 Riverside County Planning, Damian Meins, Comments and Responses

Section 5

3.1 Section 5, Table 5.4, the relation of the Southwest Area Plan and Riverside Extended Mountain Area Plan to the IRWMP should be stated as: “This is a portion of the General Plan that provides additional focus to address local community needs”.

The above comment was received after Section 5 was finalized. It is noted that Table 5.4 should state the following for the Southwest Area Plan and Riverside Extended Mountain Area Plan: “This is a portion of the General Plan that provides additional focus to address local community needs”.
