

(The following comments were received after the Public Hearing documents were sent out on November 1, 2004. These comments were also addressed in the December 20, 2004 Supplemental Staff Report.)

Gene Zimmerman
Forest Supervisor
San Bernardino National Forest Supervisor, US Forest Service, USDA
Letter dated December 2, 2004

Comment

Forest/open space areas naturally export nutrients, which the proposed TMDL/load allocations for these areas do not take into account. These areas should be considered potential problems only if there is supporting evidence, such as nutrient export rates that exceed the rates expected for these ecosystems under relatively natural conditions. Based on nutrient export data from natural forested areas in the western United States, the nutrient export rates for forested lands draining to Canyon Lake and Lake Elsinore assumed in the TMDL Watershed Model are within natural conditions. Thus, forested lands in the watershed are functioning relatively naturally with respect to nutrient export and are not a source of water quality impairments in the downstream lakes. In light of this, the load allocations for forest/open space areas should be revised and the USFS should not be required to participate in the following proposed TMDL Tasks:

- Task 4: Nutrient Water Quality Monitoring Program
- Task 8: Forest Area – Review/Revision of Forest Service Management Plans
- Task 9: Lake Elsinore In-Lake Sediment Nutrient Reduction Plan
- Task 10: Canyon Lake In-Lake Sediment Treatment Evaluation
- Task 11: Watershed and Canyon Lake and Lake Elsinore In-Lake Model Updates
- Task 12: Pollutant Trading Plan

If this approach is not suitable to the Regional Board, the USFS believes that at most only Task 8 should apply, but only under a scenario wherein the proposed 27% reduction in nitrogen is eliminated and the proposed 79% reduction in phosphorus is decreased to a nominal amount.

Staff Response

As discussed in the December 20, 2004 Supplemental Staff Report, staff have reviewed the data provided by USFS staff and agree that the following revisions to the proposed load allocations for forest/open space lands for nitrogen and phosphorus are warranted.

For nitrogen, existing loads as simulated by a watershed model and calibrated with monitoring data are within the literature values for natural areas. Therefore, staff proposes that no reduction for nitrogen be required from forest/open space land uses; the existing nitrogen loads are proposed as the final load allocation.

For phosphorus, the modeled phosphorus loads from the forest lands in the watershed are higher than the literature values provided by USFS. Board staff compared the existing phosphorus load to the average phosphorus load from western forests and determined that in order to meet the proposed TMDL, a 5% reduction is needed from forest/open space lands. This revision is shown in Errata Sheet No. 1.

Board staff does not agree that only Task 8 should be required of the USFS. Since forest/open space lands do contribute nutrients to Canyon Lake, we believe that it is appropriate that USFS be responsible (along with the other identified responsible parties) for monitoring, development of in-lake nutrient reduction programs and update of the TMDL watershed model. Staff notes that it may be that the contribution from the USFS would be small in comparison to those of other parties, given the relative amount of nutrients emanating from forested lands and that most of these loads appear to result naturally.

Phil Miller
Director of Engineering
Elsinore Valley Municipal Water District
Comment sent via email on November 16, 2004

Comment

EVMWD anticipates that in the future, in addition to the Colorado River Water (CRW), imported water from the State Water Project (SWP) will also be used to supplement Canyon Lake levels. SWP contains low concentrations of phosphorus when compared to non-detect phosphorus concentrations in CRW. EVMWD may use up 10,000 acre-feet of SWP and since the primary use of this water is to provide for domestic use, this water would be pumped out of the reservoir as needed. The WLA for supplemental water should not preclude the addition of high quality SWP water to the lake.

Staff Response

Staff evaluated the water quality data for the SWP water and CRW provided by EVMWD staff. As discussed in the December 20, 2004 Supplemental Staff Report and as shown in Errata Sheet No. 1, staff has made the change to WLA for supplemental water to Canyon Lake using the average nitrogen and phosphorus concentrations and a volume of 1,006 acre-feet/year. Even though the amount of supplemental water added to Canyon Lake may increase up to 10,000 acre-feet, it is expected that the same amount of water would be extracted out of the lake, resulting in no net increase in the volume of supplemental water to Canyon Lake. Staff continue to assume that the net volume of imported water would be 1,006 acre-feet; which was used to revise the WLA as shown on Errata Sheet No. 1. EVMWD staff have indicated their agreement that the revised WLA for supplemental water for Canyon Lake is reasonable.