



March 8, 2019

submitted via E-mail

David Woelfel
Santa Ana Regional Water Quality Control Board
3737 Market St., Ste. 500
Riverside, CA 92501

RE: Lake Elsinore Canyon Lake TMDL Task Force Comments on the 2019 Triennial Review

Dear Mr. Woelfel:

Thank you for the opportunity to provide comments regarding the 2019 Triennial Review. The following comments are submitted on behalf of the Lake Elsinore Canyon Lake Nutrient TMDL Task Force administered by the Santa Ana Watershed Project Authority (SAWPA).¹

During the 2015 Triennial Review, the Regional Board determined that revising the Lake Elsinore Canyon Lake TMDL was a "High Priority."² Consequently, over the last three years, the Task Force has worked closely with Board staff to update the TMDL and its related implementation plan. Many hundreds of hours and nearly a million dollars were invested to develop a new watershed runoff model and new water quality models for both lakes.

Now the process is nearing completion. The final TMDL Technical Report was submitted to the Regional Board in December of 2018 and the public review process is scheduled to begin very soon. Although most of the detailed scientific work is now behind us, the Task Force knows that considerable work is also required to finalize everything through a Basin Plan amendment.

Ken Theisen has advised the Task Force that the Regional Board must now submit the TMDL Technical Report for scientific peer review, solicit and respond to public comments on the document, present the materials to the Regional Board at a public workshop and make appropriate changes based on any input received. After that, there will be a formal Regional Board hearing and, if the Basin Plan amendment is approved, another round of public review and comments before a hearing before the State Board. Finally, the Basin Plan amendment must also be approved by OAL and EPA before it can become effective. Throughout this process, Regional Board staff must maintain the complete Administrative Record as well.

¹ <http://www.sawpa.org/task-forces/lake-elsinore-canyon-lake-tmdl-task-force/>

² Res. No. R8-2015-0085 (July 24, 2015)

Altogether, the fully regulatory review and approval process described above should require approximately another year to 18 months to complete. The Task Force respectfully requests that the Regional Board allocate sufficient staff time and resources to finish this important work. And, as always, we stand ready to provide whatever technical support the Regional Board may need to make that happen.

We also understand that the Regional Board has a limited budget and a finite amount of staff time. No doubt you will receive many comment letters from a number of different stakeholders all seeking to have their specific project deemed a "High Priority." Three such letters will be submitted by three of SAWPA's Task Forces.

For the last 30 years, the Santa Ana Task Force collaborative process has produced significant improvements in water quality. For this reason, we urge the Regional Board to prioritize these Task Force requests because the collective effort and commitment of a large variety of stakeholders generates real results for the watershed.

The Lake Elsinore Canyon Lake Nutrient TMDL Task Force sincerely appreciates that the Regional Board designated the TMDL revisions as a "High Priority" in the 2015 Triennial Review process. We look forward to working with Board staff to finish that important work over the next several months.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "T. Moore", with a long horizontal flourish extending to the right.

Timothy F. Moore
(on behalf of the MSAR TMDL Task Force)

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