



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



September 21, 2020

Mark Norton  
LESJWA Administrator  
Santa Ana Watershed Project Authority  
11615 Sterling Avenue  
Riverside, CA 92503

### **CDFW Letter Regarding LE/CL TMDL and San Jacinto Wildlife Area**

Dear Mr. Norton:

The California Department of Fish and Wildlife (CDFW) appreciates the opportunity to voice our concerns to the LE/CL TMDL Task Force (Task Force). Currently, we are a Task Force Agency because of our property, the San Jacinto Wildlife Area (SJWA). We have not participated in the LE/CL TMDL Task Force meetings in the recent past and are therefore not current with the actions of the Task Force. However, we have re-engaged this Summer in participation and seek to understand the different aspects of the Task Force including monitoring and distribution of participation fees.

The primary concern we have is that we question our need to participate as a Task Force agency any further. According to "Table 6-9q4. Nutrient Load Reduction Required for Watershed Jurisdictions to Comply with Lake Elsinore and Canyon Lake Nutrient TMDLs" on page 4 of "Draft Attachment A to Resolution No. RB8-2019-0041 Revised TMDLs, WLAs, and LAs Tables April 23, 2019" (see attachment), CDFW is complying with LAs and has no reduction of nutrient load required. Since we are in compliance, can we now discontinue participation as a Task Force Agency and as a responsible entity? Furthermore, does the fact that we are in compliance or the amount of relatively low amounts of TMDLs from SJWA affect the calculation of participation fees?

We are also writing to let you know that we no longer lease any land for agriculture. We stopped leasing the land over seven years ago and now only farm the land for wildlife. Our farming practices do include the use of any fertilizers or pesticides. The land is solely used to provide the public with hunting, recreational, conservational, and scientific opportunities.

Additionally, Mystic Lake which is a part of the SJWA, receives its water from the San Jacinto River, after upstream land uses have already loaded the flow with nutrients. The lake acts as a sink and accumulates the nutrients. Every so often the lake overflows back into the river but the nutrients are not from the Wildlife Area. Furthermore, we also do not farm within the Mystic Lake. Are the water quality monitoring points placed to

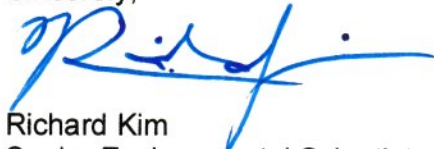
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take into account the upstream sources of nutrients? Also, do you take all the above into consideration when calculating the participation fees or the need to participate? Please provide in writing, the basis of why the CDFW is included as a Task Force Agency and Responsible Entity, and how our participation fees are calculated.

If you have any questions regarding this Letter, please contact Stefan Awender at [Stefan.Awender@wildlife.ca.gov](mailto:Stefan.Awender@wildlife.ca.gov).

Sincerely,



Richard Kim  
Senior Environmental Scientist  
Inland Deserts Region - Lands South Program

**ATTACHMENT A**

Table ~~6~~ 5-9p  
 Nutrient TMDLs and Compliance Dates for Lake Elsinore and Canyon Lake

TMDL	Final Total Phosphorus TMDL (kg/yr) <sup>a, b</sup>	Final Total Nitrogen TMDL (kg/yr) <sup>a, b</sup>
Canyon Lake	<del>8,691</del> <u>2,924</u>	<del>37,735</del> <u>10,284</u>
<u>Main Lake</u>	<u>2,076</u>	<u>7,404</u>
<u>East Bay</u>	<u>848</u>	<u>2,880</u>
<u>Overflow to Lake Elsinore</u>	<u>3,358</u>	<u>9,656</u>
Lake Elsinore	<del>28,584</del> <u>14,651</u>	<del>239,025</del> <u>152,349</u>

<sup>a</sup> Final compliance to be achieved as soon as possible, but no later than 20 years after TMDL effective date. ~~2020~~.

<sup>b</sup> TMDLs specified as 10-year running average.

Table 6-9q1

Lake Elsinore and Canyon Lake  
Nitrogen and Phosphorus Waste Load and Load Allocations <sup>a,b,c</sup>

Lake Segment	Wasteload Allocation (kg/yr)		Load Allocation (kg/yr)	
	TP	TN	TP	TN
<b>Canyon Lake (Main Lake)</b>				
Watershed Runoff	954	2,743	195	562
Supplemental Water	As needed		NA	
Atmospheric Deposition	NA		17	1,077
Sediment Nutrient Flux	NA		910	3,023
<b>Canyon Lake (East Bay)</b>				
Watershed Runoff	494	1,422	68	195
Supplemental Water	As needed		NA	
Atmospheric Deposition	NA		5	331
Sediment Nutrient Flux	NA		280	932
<b>Lake Elsinore</b>				
Watershed Runoff (Canyon Lake Overflows)	2,433	6,994	926	2,661
Watershed Runoff	687	1,974	107	309
Supplemental Water	4,198	12,069	NA	
Atmospheric Deposition	NA		156	9,682
Sediment Nutrient Flux	NA		9,503	128,315

<sup>a</sup> The TMDL allocations for Canyon Lake apply to those land uses located upstream of Canyon Lake.

<sup>b</sup> Final allocation compliance to be achieved as soon as possible, but no later than 10 years after TMDL effective date.

<sup>c</sup> TMDL and allocations specified as 10-year running average.

Table 6-9q3. Allocations for Watershed Runoff in Lake Elsinore and Canyon Lake Nutrient TMDLs<sup>a</sup>

Responsible Agency	Canyon Lake Main Lake		Canyon Lake East Bay		Local Lake Elsinore <sup>b</sup>		Canyon Lake Overflow to Lake Elsinore <sup>b</sup>	
	TP (kg/yr)	TN (kg/yr)	TP (kg/yr)	TN (kg/yr)	TP (kg/yr)	TN (kg/yr)	TP (kg/yr)	TN (kg/yr)
<b>Wasteload Allocations</b>								
Banning	-	-	-	-	-	-	1	4
Beaumont	-	-	-	-	-	-	11	31
CAFO	n/a	n/a	n/a	n/a	0	0	10	30
Caltrans	12	36	4	13	9	27	30	87
Canyon Lake	13	39	17	49	11	32	46	132
Federal – Dept. of Defense	23	66	-	-	-	-	35	99
Hemet	-	-	64	184	-	-	112	323
Lake Elsinore	15	43	4	10	381	1,095	28	80
March Joint Powers Authority	19	55	-	-	-	-	29	82
Menifee	56	162	240	691	9	25	445	1,280
Moreno Valley	281	807	-	-	-	-	422	1,214
Murrieta	-	-	6	18	-	-	9	27
Perris	165	473	0	1	-	-	248	712
Riverside	9	25	-	-	-	-	13	38
Riverside County	360	1,036	158	454	149	428	957	2,752
San Jacinto	0	1	1	2	-	-	36	103
Wildomar	-	-	0	0	128	367	0.1	0.2
<b>Load Allocations</b>								
Agriculture-CWAD: Irrigated	66	190	22	63	-	-	153	441
Agriculture-CWAD: Non-irrigated	40	114	28	80	0	1	109	313
Agriculture (Small)	16	46	9	25	1	4	39	112
CA Dept. of Fish and Wildlife	28	80	-	-	-	-	73	209
Federal - National Forest	-	-	1	4	106	304	328	944
Federal – Other	19	55	5	14	-	-	67	194
Federal – Wilderness	-	-	-	-	-	-	64	183
State Land	22	64	-	-	-	-	59	170
Tribal Reservations	-	-	-	-	-	-	18	52
Western Riverside County Regional Conservation Authority	5	13	3	9	-	-	15	42
<b>Total Allowable Watershed Load (WLAs and LAs)</b>	<b>1,149</b>	<b>3,304</b>	<b>562</b>	<b>1,617</b>	<b>794</b>	<b>2,283</b>	<b>3,358</b>	<b>9,656</b>

<sup>a</sup> Final allocation compliance to be achieved as soon as possible, but no later than 10 years after TMDL effective date.

<sup>b</sup> Allocations for Local Lake Elsinore and Canyon Lake Overflow to Lake Elsinore are combined into a single Lake Elsinore TMDL. However, the allocations are reported separately here since source controls in the Canyon Lake watershed can be used to estimate credits toward reducing loads in Overflows from Canyon Lake to Lake Elsinore.

Table 6-9q4. Nutrient Load Reduction Required for Watershed Jurisdictions to Comply with Lake Elsinore and Canyon Lake Nutrient TMDLs<sup>a, b, c</sup>

Responsible Agency	Canyon Lake Main Lake		Canyon Lake East Bay		Local Lake Elsinore		Canyon Lake Overflow to Lake Elsinore	
	TP (kg/yr)	TN (kg/yr)	TP (kg/yr)	TN (kg/yr)	TP (kg/yr)	TN (kg/yr)	TP (kg/yr)	TN (kg/yr)
<b>Point Sources with NPDES Permits</b>								
Banning	-	-	-	-	-	-	1	7
Beaumont	-	-	-	-	-	-	3	43
CAFO	n/a	n/a	n/a	n/a	0	(0)	31	31
Caltrans	1	130	0	45	1	81	-	280
Canyon Lake	5	55	6	90	3	48	16	217
Federal – Dept. of Defense	4	158	-	-	-	-	7	237
Hemet	-	-	37	332	-	-	68	603
Lake Elsinore	4	49	1	15	26	1,038	8	96
March Joint Powers Authority	4	54	-	-	-	-	6	81
Menifee	45	297	146	1,204	4	24	286	2,252
Moreno Valley	125	1,604	-	-	-	-	187	2,407
Murrieta	-	-	3	37	-	-	4	56
Perris	59	809	0	-	-	-	89	1,213
Riverside	4	55	-	-	-	-	6	82
Riverside County	210	1,093	162	402	50	466	666	2,621
San Jacinto	-	-	0	2	-	-	22	167
Wildomar	-	-	-	-	40	525	-	-
<b>Nonpoint Sources</b>								
Agriculture (CWAD)	30	-	10	-	-	-	66	-
Agriculture (Non-irrigated)	237	285	155	176	1	1	665	801
Agriculture (Small)	37	24	27	24	0	-	98	70
CA Dept. of Fish and Wildlife	0	0	-	-	-	-	0	0
Federal - National Forest	-	-	-	-	1	2	1	6
Federal – Other	-	-	1	1	-	-	0	-
Federal – Wilderness	-	-	-	-	-	-	0	0
State Land	2	5	-	-	-	-	3	9
Tribal Reservations	-	-	-	-	-	-	0	6
Western Riverside County Regional Conservation Authority	0	0	0	0	-	-	2	2
<b>Total Watershed Load Reduction Required</b>	<b>767</b>	<b>4,516</b>	<b>548</b>	<b>2,293</b>	<b>127</b>	<b>2,186</b>	<b>2,220</b>	<b>11,049</b>

- a The required load reductions for Canyon Lake apply to those land uses located upstream of Canyon Lake.
- b Final allocation compliance to be achieved as soon as possible, but no later than 10 years after TMDL effective date.
- c Required load reductions specified as 10-year running average.