

2021-2022 Lake Elsinore Canyon Lake Annual Nutrient TMDL Report Comment Response Matrix

Commentor	Affiliation	Report Element	Comment	Internal Notes	Responsible Editor	Response
Barbara Barry	Santa Ana Regional Water Quality Control Board	Various/unspecified	In several parts of the document, it refers to the "2020 TMDL limit" or "2020 TMDL Target". I'm assuming this is referring to the 2004 TMDL final limits or targets, due to be met in 2020. Please make sure this is spelled out in a little more detail somewhere in the report as to what this is referring to as to avoid confusion. I could see someone confusing these limits with the proposed revised TMDL limits. If I missed where this is explained, I apologize.		JR/KCS	This was addressed in Section 1.1 and in Tables 1-1 and 1-2. Added a bit more language to make it clearer. Changed all language throughout report to say "target" instead of "limit" for consistency.
"Rguill"	Unknown	Section 1.1	The 2018 Integrated Report was approved by U.S. EPA on June 9, 2021. Rev. No. 2020-0039	Reference to 303(d) list.	KB	Revised to Res No. 2020-0039
Abigail Suter	RCFC	Section 1.1	Is this 2014/2016 report the latest or does it need updating?	Reference to 303(d) list.	KB	Revised to Res No. 2020-0039
Abigail Suter	RCFC	Section 2.7	Rainfall totals to be added in the next 4 next paragraphs. Hydrology passed them data on 8/15	Reference to missing rainfall data indicated by "XX"	ALTA	Updated rainfall in report.
Abigail Suter	RCFC	Section 2.9, Table 2-5	pending rainfall data	Reference to missing rainfall data in table	ALTA	Updated rainfall in report.
Abigail Suter	RCFC	Section 3.3.3	pending rainfall data	Reference to missing rainfall data indicated by "..."	ALTA	Updated rainfall in report.
Abigail Suter	RCFC	Section 3.3.3	Was it confirmed that the water deliveries remained stable over this time period? Or could a decrease then an increase in supplied water cause this?	Reference to significant decrease in Sept TDS concentrations compared to Aug/Oct	KB	See text revisions. There were no storms or inputs from Canyon Lake in September, and the TDS result does not correlate with conductivity measurements during this time period. Conductivity and TDS should always have a near linear relationship. Since conductivity shows a consistent trend that makes sense we are pretty confident that the lab reported TDS values is erroneous for the Sept sampling date.
Abigail Suter	RCFC	Section 3.4.3	Figure 3-15 has a note defining what is meant by "rolling 12-month" and that the data is from Aug 2020-June 2022. Can this be explained further here in the narrative.	Reference to Fig 3-15	KB	Please see text revisions.
Abigail Suter	RCFC	Figure 3-15	Can this also be explained in narrative, see prior comment.	Reference to Section 3.4.3 (see prior comment). Aug 2020 should be changed to Aug 2021.	KB	Please see text revisions.
Abigail Suter	RCFC	Figure 3-16	Same issue, see prior comments.	See above. Aug 2020 should be changed to Aug 2021.	KB	Please see text revisions.
Steve Wolosoff	CDM Smith	Table 2-1	TP concentration in CL overflows show as 0.00. Should this be non-detected at 0.05 ? If there is a different value here, then there would need to be changes to Table 2-2 through 2-4		ALTA	Updated tables in report to reflect ND value.
Steve Wolosoff	CDM Smith	Various/unspecified	contains placeholders for rainfall depth as XX	Reference to missing rainfall data	ALTA	Updated rainfall in report.
Steve Wolosoff	CDM Smith	Tables 2-7 and 2-9	geommeans are not typically used for nutrient data. I think a flow-weighted mean might be a better metric to show		ALTA	The geommean calculation was added based on a reviewer comment in the 2016-2017 annual report process. Prior to 2016-2017 only the Annual Mean was included in these tables. The geometric mean is most useful when numbers in the series are not independent of each other or if numbers tend to make large fluctuations. Since nutrients typically don't fluctuate much in storm-wide flow-weight composites the geommean actually is pretty close to the arithmetic mean in most cases. The concentrations reported for each individual storm event are flow-weight composite values so the arithmetic mean of these is an avg flow weighted value.
Steve Wolosoff	CDM Smith	Table 2-11	I see the non-detected for TP in Table 2-11. This should be used in the earlier tables as opposed to 0.0		ALTA	Updated tables in report to reflect ND value.
Steve Wolosoff	CDM Smith	Table 2-5	Table 2-5 is blank.	Table is labeled 2-5, but should be 2-15. The Table above it should be changed to 2-14.	ALTA	Updated rainfall in report.
Steve Wolosoff	CDM Smith	Tables 3-1 and 3-2	Tables 3-1 and 3-2 include 10 year rolling average which is not how in-lake targets are evaluated for compliance. The annual values shown in the middle columns are key and show that CL has dipped below 25 ug/l in recent years. This good news should pop out much more.		JR/KCS	Added note to text in section 3.2 stating that the "TMDL compliance for each lake is determined by its annual average relative to the 2020 TMDL target." The value in parentheses is the % of ANNUAL means not meeting target. This % drops during each 10-year period for CL. We have kept these tables for now as they provided good context with past data, but let's reconsider doing so for future reports, particularly given the changes proposed for the revised TMDL.
Steve Wolosoff	CDM Smith	Figure 3-2	Figure 3-2 seems odd to have Fahrenheit and Celsius plotted against one another. I suggest you make consistent. The slope of the line is key so maybe show the trendline equation I suggest we bring to collect more complete profiles for DO, temp, pH, and Cond in future at 1 hr or 1 meter intervals	ambient air temperature now reflected in Celsius to stay consistent with water temperature	NI/WW- fix plot? -NI fixed	Good catch - Revised to plot Celsius vs. Celsius
Steve Wolosoff	CDM Smith	Section 3.5	Add point that secchi depth rose to nearly 8 feet in the East Bay at same time we saw 860ug/l of concentration that was driven by algae floating in deeper water. This bloom was not registered in the satellite imagery (add this point at bottom of page 81)	Reference to satellite imagery and CHL-A concentrations	JR/KCS	Added a paragraph to explain this
Steve Wolosoff	CDM Smith	Section 3.5	I don't agree with statements on page 81 regarding the general tracking between surface point observations and the CDF. The point measurements seems to land high or low relative to the more frequent portions of the CDFs. It might be good for Task Force to re-evaluate the provider or request an updated recalibration of the image analysis algorithms (although this concerns me given that the point measurements are sometimes high and sometimes low).	Reference to satellite imagery and CHL-A concentrations	JR/KCS	Statement removed. We agree that we should re-evaluate the use of satellite imagery. The imagery has been interesting and provides a better measure of relative spatial variability, but in the end it has limited direct application for compliance itself. Given the known spatial variability of algal density, it might be worth discussing the option of dropping the satellite imagery.
Tess Dunham	KSC	Section 2.2, pg 6	Suggest that the sentence "In without accounting for this offset, the watershed loading of total phosphorus to the lake would exceed the TMDL allocation as shown in Table 3.4," be deleted. No need for us to point out the converse of the previous sentence.	delete	JR	Deleted
Tess Dunham	KSC	Section 2.7, pg. 17	values for inches of rainfall need to be provided	Add totals	JR	Added rainfall totals
Tess Dunham	KSC	Table 3-1 (and subsequent tables)	is it appropriate for us to include the Ten Year Average considering that the Target is an annual average? Not sure why we bother. Also not sure why we bother to show that 100% of annual means don't meet the TMDL target.		JR	These tables were added during last year's 2020-2021 annual report based on a comment from Steve W in the watershed section. We (Wood, not Steve) then added it to the in-lake section as well for consistency sake and to show how compliance has evolved over a 10-year rolling period (i.e., % of samples not meeting annual compliance target). This year we added in a statement right before Tables 3-1 and 3-2 stating that compliance for in-lake constituents is based on annual averages and not the 10-year rolling average. They do help provide some context to how compliance looks over the long term - suggest keeping for this annual report at this point but consider whether doing so next time is worthwhile, particularly knowing we are looking to revised the targets in the updated TMDL.
Tess Dunham	KSC	Table 3-1, pg. 34	notes: "TMDL criteria" should be changed to "TMDL targets"	reference to notes attached to table	NI	Good catch here and below, see text revisions
Tess Dunham	KSC	Table 3-2, pg. 36	notes: "TMDL criteria" should be changed to "TMDL targets"	reference to notes attached to table	NI	Please see text revisions
Tess Dunham	KSC	Section 3-3, pg 50	reference to Total ammonia-N concentrations, reference if made to the CCC "objective" is this an actual water quality objective, or the target from the 2004 TMDL? If target, should be referenced as the target. Same with the CMC, and same with discussion in the Canyon Lake section as well.		JR	Correct, this is the 2004 TMDL target. Updated text.
Tess Dunham	KSC	Table 3-8, pg. 52	notes: Asterisk for ammonia references 2004 TMDL Permit NH3. Reference to Permit. Should be targets.	reference to notes attached to table	NI	Please see text revisions
Tess Dunham	KSC	Table 3-9, pg. 53	notes: Asterisk for ammonia references 2004 TMDL Permit NH3. Reference to Permit. Should be targets.	reference to notes attached to table	NI	Please see text revisions
Tess Dunham	KSC	Tables 3-17 and 3-18	notes: Asterisk for ammonia references 2004 TMDL Permit NH3. Reference to Permit. Should be targets.	reference to notes attached to table	NI	Please see text revisions
Tess Dunham	KSC	Section 4.2.1, pg. 90, paragraph 5	formatting issues, and reference to 2020 TMDL limits rather than targets.	reference to nitrogen and phosphorus exceedance of 2020 TMDL	NI	Please see text revisions
Tess Dunham	KSC	Section 4.2.1, pg. 90, paragraph 6	reference to CCC objective rather than target.	references objective	NI	Please see text revisions
Tess Dunham	KSC	Section 4.2.2, pg. 90 paragraph 1	reference to TMDL limit rather than target.	references objective	NI	Please see text revisions
Tess Dunham	KSC	Section 4.2.2, pg. 90, paragraph 2	reference to CCC threshold value and CMC value. Need to be consistent and should be target.		JR	Please see text revisions
Tess Dunham	KSC	Section 4.2.2, pg. 91, paragraph 5	reference to EPA should be to EPA chronic water quality "criteria" rather than "objective." Then again, uses the term thresholds.		JR	Please see text revisions