

# Lake Elsinore/Canyon Lake TMDL Task Force

August 30, 2021



# Recap of TMDL Related Activities



Draft December 1, 2018 Version

Publicly Reviewed Spring 2019

Peer Reviewed 2019-2020



Water Board staff review of Draft TMDL

Fall 2020



Task Force Consultant Response to  
Water Board questions

Fall 2020



Model Migrations & Additional  
Modeling Runs

Late 2020 through Spring 2021

# Perspectives – Water Board

2004 TMDL needs to be revised

Draft 2018 Version needs to be revised

Current lack of staff resources to prepare revision

Would like to work in cooperation with Task Force for revisions

Open to phased implementation plan

# Perspectives - Task Force Members

- Believed Draft 2018 Version was supported by Water Board staff
  - Multiple lines of evidence to support use of median of reference condition for final WLA
  - Question evidence that may be used to support use of 25<sup>th</sup> percentile
- Concerned with changing WLAs (and ability to meet more stringent WLAs)
- Concerned with additional time and costs associated with revising Draft 2018 Version
- Looking for certainty
- Concerned with permitting impacts
  - E.g., pending Regional MS4 Permit

# LEAMS Status

- Lack of Nitrogen Credits in 2020
- Review of Systems in Process
  - Expected to be completed fall 2021
- End of useful life
- Need to explore alternatives

# Options for Discussion

- Do Nothing
- WRCAC Recommendation
  - Water Board hire objective, local expert to fully review methods used to develop reference condition concentration criteria
- Move Forward with use of 25<sup>th</sup> Percentile of reference condition
  - Update Draft 2018 TMDL
  - Prepare Phased TMDL
    - Interim WLAs based on Median (e.g., 10 years)
    - Final WLAs based on 25<sup>th</sup> Percentile (e.g., 20 years)
  - Update Implementation Plan
    - Incorporate process to address LEAMS
    - Identify & Implement Offsets

# Pros & Cons – Do Nothing Option

## Pros

- No immediate cost to Task Force members
- 2004 TMDL remains intact
- Compliance with WLAs/LAs feasible when evaluated collectively
  - Relies on Canyon Lake offset for TP
  - Includes Lake Elsinore offset for TP in TMDL

## Cons

- Numeric targets not met consistently
- Compliance schedule has expired
- Manner of incorporation into Regional MS4 Permit unknown
- Impact of LEAMS unknown
- Water Board will revise as deemed necessary, Task Force members in role of public commenting on draft

# Pros & Cons – WRCAC Option

## **Pros**

- Takes into consideration local reference conditions
- Provides Water Board with an objective evaluation

## **Cons**

- Additional time to implement
- Stalls revision of 2004 TMDL until further date
- Limited Water Board resources



# Pros & Cons – Move Forward with 25<sup>th</sup> Percentile

## Pros

- Keeps revision to 2004 TMDL moving forward
- Can incorporate phased implementation
  - Interim WLAs using median
  - Final WLAs using 25<sup>th</sup> percentile
- Can incorporate reopener prior to application of Final WLAs
- New Compliance Schedule
- Can allow for LEAMS alternative evaluation and implementation

## Cons

- Concerns with appropriateness of using 25<sup>th</sup> percentile for Final WLAs
- Concerns with ability to comply with Final WLAs
- Additional costs for Task Force members
- Uncertainty in the outcome
- Uncertainty re: timing

# Task Force Next Steps Depending on Option

| <b>Do Nothing Option</b>                                | <b>WRCAC Option</b>                  | <b>Move Forward Option</b>   |
|---|--------------------------------------|--|
| 2004 TMDL Remains in place                              | Water Board identify funding         | Develop Scope of Work, Cost Estimate and Schedule to Revise Draft 2018 TMDL    |
| Continue to conduct monitoring                          | Water Board identify local expert(s) | Task Force to develop draft revised Implementation Plan with Water Board staff |
| Prepare annual compliance reports                       |                                      |  |
| Potential loss of Lake Elsinore Nitrogen Offset Credits |                                      |  |

# Task Force Direction Needed

