



January 27, 2017

Via email to:

Tom Barnes; ESA

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### **Re: San Juan Watershed Project NOP Comments**

Dear Mr. Barnes

Orange County Coastkeeper (“Coastkeeper”) is a nonprofit clean water organization with the mission to protect and promote sustainable water resources that are swimmable, drinkable, fishable and sustainable. The Sierra Club has the mission to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. After reviewing the Notice of Preparation and presentation for the San Juan Watershed project, we have the following comments:

1. Our organizations strongly support the beneficial uses of San Juan Creek as defined by the San Diego Regional Water Board. These uses include Agricultural and Municipal supply, recreation, and warm and cold water wildlife habitat. The EIR should discuss how the project will support these beneficial uses.
2. The EIR should discuss the issue of upstream illicit dry weather runoff inputs and stormwater pollution discharges. This discussion should include confirmation that this project is not a pollution BMP and will not provide relief to upstream agencies to meet all water requirements at their discharge site. This project should not be seen as an excuse to neglect water quality above the project area.
3. The section of the creek within the project area has been highly modified for flood control purposes, with a resulting loss of instream and riparian habitat. A priority for our organizations is functioning stream ecosystems and this project presents the opportunity to restore stream and riparian habitat in the project area. The EIR should discuss restoration as part of the project.

January 27, 2017

Page 2 of 2

4. Redirecting storm water and urban runoff to flow into the groundwater reservoirs may cause de-watering of the area below the project area. The EIR should include detail on how much de-watering may happen below the project area and what the affects may be on biological resources, geology and air quality (e.g. cause drying of the earth and dust in the air), and surrounding water sources.
5. The PowerPoint presentation material and the San Juan Watershed Project website mention that a positive impact is “environmental/ecological enhancements.” The EIR should provide details on what the ecological/environmental enhancements may be.

Thank you for your consideration of our views.

Regards,



Raymond Hiemstra  
Associate Director  
Orange County Coastkeeper

Penny Elia



Sierra Club Orange County Conservation Committee