



Inland Empire Waterkeeper

Advocacy • Education • Restoration • Enforcement

January 31, 2008

City of Moreno Valley
Community Development Department/Planning Division
Attn: Chris Ormsby
14177 Frederick Street
Moreno Valley, Ca 92552-0805

RE: Public Comment Card for Quail Ranch, Moreno Gilman 650, LLC

Dear Mr. Ormsby,

Thank you for this opportunity to submit comments. Inland Empire Waterkeeper is a grassroots, non-profit organization dedicated to protecting and improving the quality of our inland waterways. Our interest in this proposed development pertains to impacts on surface water quality, specifically to Mystic Lake, the San Jacinto River and the major washes/canyons that flow through the property towards Gilman Springs Road.

Mystic Lake provides year-round refuge for endangered animals and salt-sensitive plants, and particularly migrating birds when water is present but surprisingly, it is not shown on any figures contained in the NOP. Since this document is for evaluating impacts to the environment, and Mystic Lake has many tangible environmental benefits in terms of habitat, flood control, groundwater recharge and aesthetics, we request that it be included in the draft EIR. The project consultant should contact the Santa Ana Regional Water Quality Control Board on the status of adding Mystic Lake to the updated Basin Plan.

The tributaries to the San Jacinto River, the river itself and Mystic Lake play key roles in two 303(d)-listed waterways: Lake Elsinore and Canyon Lake. Both lakes are nutrient impaired and Canyon Lake is also being tested for pathogens. Mystic Lake and the San Jacinto River are critical in the TMDL process. Mystic Lake and its surrounding agricultural area should be considered in your environmental review.

Since research has shown a direct correlation between increasing imperviousness and degrading downstream water quality, how will this project ensure that urban runoff during construction, dry years, typical storms and large storms will not degrade the water quality of Mystic Lake and the unnamed tributaries that run through the site? What types of innovative permanent urban runoff treatment and infiltration systems shall be installed? Please consider such cost-effective solutions as porous pavement (concrete, asphalt), non-irrigated infiltration trenches and pits, cisterns or rain barrels. In addition, there appears to be a dairy farm downstream of the project that presents a foreseeable problem during a flood event. Please discuss how runoff will not flow from the proposed project through the dairy and into Mystic Lake or the San Jacinto River carrying toxic levels of bacteria, salts and nutrients.

Golf courses are notorious for wasting water and contributing to high concentrations of nutrients and pesticides downstream. In light of our State's water crisis and the ever-increasing need to conserve water, how will this golf course be redesigned to keep this from happening? Please consider artificial turf or other solutions more appropriate for our desert climate.

I strongly encourage the project applicant to speak to the San Jacinto River Watershed Council before final design. The council is made up of several local individuals intimately familiar with the fluctuations of the San Jacinto River and Mystic Lake. The council is completing their Watershed Management Plan for the San Jacinto River Watershed, which should be reviewed by the project consultant. Also, they are working to have several studies completed with help from the U.S. Bureau of Reclamation that would also be of interest.