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Carlsbad Watershed Network

Member Organizations

Agua Hedionda Lagoon
Foundation
Baticuitos Lagoon Foundation

August 18, 2016

Buena Vista Audubon Society

San Diego Regional Water Quality Control Board
2375 Northside Drive Suite 100
San Diego, CA. 92108

Buena Vista Lagoon
Foundation

Canyons Network

Comment - June 2016 Second Revised Carlsbad WMA WQIP

Cottonwood Creek
Conservancy

Limited Review / General Comments

The Escondido Creek
Conservancy

We have not endeavored to fully review the WQIP but have focused on the main document and spent relatively little time on the appendices. To adequately review all of the Hydrologic Areas (Ha's) and comment on each one separately is not feasible for us. Instead, we have commented on some areas we are more familiar with, and our comments may generally be seen as applying to all sections.

Friends of Loma Alta Creek

Preserve Calavera

San Elijo Lagoon
Conservancy

When page numbers are referenced, like p. 225/197, the first one is the page number showing at the top of the PDF in Adobe Reader, and the second is the page number at the bottom of the page in the document.

Sierra Club of San Diego

Affiliated Organizations

Encinitas Unified School
District

A copy of the PDF reviewed with our comments will be attached to the email transmittal of this letter.

Resource Conservation
District of Greater San Diego
County

1. Improvements to the Plan

UCSD Natural Reserve
System

We are encouraged by many changes in the WQIP: Identifying the individual PWQCs (Priority Water Quality Conditions) for each of the HA's, changes to the HPWQCs (Highest Priority Water Quality Conditions) that have been selected, rather than the previous "one size fits all" approach of bacteria as the sole HPWQC. Also, the strategies appear to be more robust and put more emphasis on actual restoration of streams and riparian habitat. This is good news.

P. 225/197 We are very encouraged to see this kind of strategy, to look at stream restoration as a method to reduce nutrients, bacteria, and other pollutants. We will be interested in seeing the updates on the pilot program. In the pilot program it might be of benefit to provide a

trail access into the pilot project. Generating public support early on could assist in future funding of a much broader program.

P. 68/40 Strategies: As a core jurisdictional program, it is noted and appreciated that these strategies have been clearly defined as being part of the core programs. We hope this will facilitate restoration of existing stream habitat and encourage these strategies:

P. 74/46 - Sec. 2.4.2.12:

“Program for Stream, Channel and/or Existing Habitat Rehabilitation in Areas of Existing Development

As a new program requirement under the current MS4 Permit, RAs developed rehabilitation programs to be included in their JRMPs....”

This is an improvement. However, it is not certain how many of these programs will be implemented, which we discuss below.

2. Alternative Compliance

Alternative Compliance may have a role to play in improving water quality, both dry and wet weather flows. We think there needs to be more clarity on the trade off value (Water Quality Equivalency) of offsite habitat restoration and other BMP's versus onsite. We are hopeful that resources will be employed to pursue an alternative compliance program, so that this option will be fully explored. We are not happy with how little attention riparian habitat restoration has received as an effective means of improving water quality in general. We note that the County of San Diego, the City of San Marcos, and the City of Escondido have begun the process of identifying potential projects which could benefit from this program, and we encourage the other agencies to consider a similar approach.

Also, there are numerous requirements that need to be met before these programs will be implemented: Responsible Agency approval, regulatory agency approval, financial resources (grant awards), adequate staffing. Lack of any of these things can prevent these programs from happening, and the same can be said of Optional Strategies. See p. 74/46 Sec. 2.4.2.12:

3. Habitat Restoration

We were particularly pleased to see Riparian Habitat Degradation as the HPWQC in the Escondido Creek HA, as well as for or Agua Hedionda HA (Table 8: Highest Priority Water Quality Conditions by Hydrologic Area, p. 59/31). We agree with this because of the downstream impacts from the existing MS4 system within the City of Escondido on the San Elijo Lagoon (dry and wet weather) and the Pacific Ocean (wet weather). Large quantities of trash are constantly being fed into the creek in addition to nutrients, toxicity, and auto related pollutants. Due to the large amounts of impervious surfaces, and an MS4 system that the public does not have much awareness of, opening up the creek in a way that promotes restoration of riparian habitat and adds open space not only promotes water quality downstream, it promotes awareness upstream. And it brings a resource of natural beauty.

4. Disappointed with Goals

For upper Escondido Creek, we are surprised that the Interim and Final Goals propose only one project in 14 years. This project involves only 1400 LF of habitat restoration. Further it is unclear what habitat restoration will be accomplished in that 1400 LF. If the HPWQC is truly riparian habitat restoration, (and that would have to be almost exclusively within the City of Escondido, since there is a lot of riparian habitat on the west and east of the city) then this small area seems inadequate to make a significant difference. As stated in our comments section of the PDF, what are the actual benefits in terms of improving water quality of this proposed project? That question should be answered to see if the proposed numeric Interim and Final goals established for the Escondido Creek HA will result in downstream improvement in water quality.

If we have missed something here, and there are other projects the City has identified for restoration of riparian habitat, then they should be identified in this document at this point, not in an appendix. Also we recommend that the City add more riparian habitat restoration to the interim and final goals, such that the implementation of this HPWQC would significantly improve the downstream water quality during the goals timeframe.

P. 251/223 The Spruce Street Project looks like a great project to start work on improving the riparian habitat in the Escondido HA. But is this really all that is being planned as Interim and Final Goals for the Escondido HA? Upstream of the end of the flood control channel from the City of Escondido, there are miles of concrete lined channel that provide no riparian habitat. And so the city has identified only 1400 LF of open channel in the next 14 years, that will be rehabilitated to improve the riparian habitat of the Escondido Creek HA. We would think the downstream RA's would be disappointed in this project as the only one identified, considering the large impact that the rest of the concrete lined channel has on the lagoon. That is where most of the downstream trash comes from and where most of the nutrients and toxicity is generated.

These questions need to be answered:

- What will 1400 LF of improvement in the Spruce Street Project actually accomplish in 14 years?
- What benefit does the HA get from 14 years of Interim and Final Goals being met?

Downstream we have millions of dollars being spent to restore San Elijo Lagoon, and when it is done we will still have pretty much the same upstream concrete lined MS4 channel system, with only 1400 LF of riparian habitat having been restored in 14 years. There could be a hydrologic study of this area, and the entire channel could be made a storm water mitigation site.

If this is all that is proposed, perhaps the money would be better spent in putting in an adequate trash and sediment control at the end of the flood control system, because

this small effort over 14 years is not really going to improve anything significant in our opinion.

We suggest that this Spruce Street Project be completed in this next 5 year cycle, at the minimum. Then, as the next Interim Goal you could identify the next, much larger projects to improve and restore the riparian habitat. You do not have to sacrifice the flood control that is needed for public safety. Methods exist now that achieve both goals, and you end up with a great environmental resource for the entire community.

5. Homeless Impacts

P. 273/245 As noted in the comments in the document, the Cities of Encinitas and Solana Beach have proposed a program to work with local non-profits to provide sanitation facilities to the homeless people that are presently using the Escondido Creek for this purpose. This is something that we believe could be considered upstream by the City of Escondido. Just below the end of the flood control channel there are a number of homeless encampments that utilize the creek for sanitation. High bacteria levels and large quantities of trash attest to this encampment. There are several locations where mobile sanitation facilities could be placed, that would be convenient for homeless individuals to access. Trash bins could also be located at these locations, which are owned by the City of Escondido.

This same approach should be considered by the other RAs that have not done so.

6. Strategies

P. 237/209 Strategy 57 (Table 44) – Divert persistent dry weather flows from storm drains to sewer

Not sure why this is listed as a strategy at this stage. We understand that if nothing else works, then you might look at doing this. But of course this would be a strategy of last recourse. It is expensive, and It is hard to believe all of the other strategies listed would not be able to effectively reduce flow and pollutant issues. And if they did not work, perhaps it was due to lack of effort, not that they cannot work.

One other comment is that the sewage treatment facilities will then lose capacity that would otherwise be available for homes. And it is not clear who paid for that capacity, which would now be diverted to storm water treatment.

P. 238/210 Strategy 58 (Table 44) – Implement Stream Restoration Activities

This strategy should be up front, not relegated to near the end of the list. This is one of the ultimate goals of the WQIP, to restore our streams. The "Circumstances" are that this is only done if "Interim Goals are not met". In other words the fact that this strategy is not near the top of the list indicates that it is not as highly prioritized.

7. Optional Strategies

P. 217/189 We note that the core strategies appear to have been adopted and will move forward. However, beginning with strategy 42 there are a number of criteria that will need to be met for the following strategies to move forward. We are concerned that many of these optional strategies may not even be considered, and that many include

very beneficial programs to improve water quality. Are these really meaningful strategies?

Conclusions

P. 105/77 The assessment process, as is stated, will be the basis for determining how the strategies the RA's have selected, are working. In looking at Tables 16 through 20, it is apparent that a lot of data and summary analysis is going to be accomplished, and this will provide a first picture of how well this WQIP process is actually working. And therefore we have a request that this assessment evaluation in the next phase be summarized in a document that the public can review and understand.

We have found this document difficult to work with. The main body of it is 54% longer than the previous one, and seeing what has changed is so time consuming that effective review is very difficult. We had requested that the revised WQIP have some indication of what has changed, in anticipation of this problem. In our review we have seen that much of it is the same, but figuring out where the 88 pages were added is unnecessarily hard.

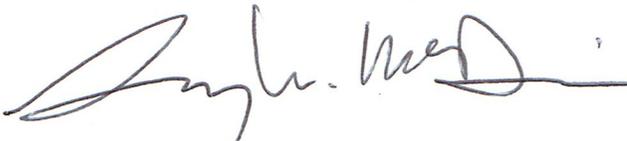
Navigation around the doc is very difficult. I believe it is possible to have a PDF file with a structure that you can click on the table of contents and go to a section or page, and the use of hyperlinks throughout would make the whole thing easier to use for everyone.

We feel that a Consultation Panel meeting should have been scheduled to review and explain the revisions, and we recommend that one be scheduled in the near future.

We appreciate all the hard work that everyone involved has put in to bring this effort to its present state. A lot has been accomplished.



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