



**cwn**  
*Carlsbad Watershed Network*

### Member Organizations

Agua Hedionda Lagoon  
Foundation

Batiquitos Lagoon Foundation

Buena Vista Lagoon  
Foundation

Canyons Network

Cottonwood Creek  
Conservancy

The Escondido Creek  
Conservancy

Greater San Diego Resource  
Conservation District

Preserve Calavera

San Elijo Lagoon  
Conservancy

July 31, 2015

Ms. Laurie Walsh

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

Subject: DRAFT Carlsbad Watershed Management Area Water Quality  
Improvement Plan

Dear Ms. Walsh:

As Alternate Consultation Panel Member, I am humbled by the job that  
Primary Member Greg McBain has been doing and feel somewhat  
inadequate to the task. Still, I am glad to be able to contribute what I can to  
the WQIP effort.

In these comments I am using what I have been able to find by examining the  
documents and the guidance of others involved in this process.

Please note that references to page numbers in parentheses (p. 275) refer to  
the page count of the whole document as counted by Adobe Reader. Others  
are page numbers of the individual, separate documents.

### **Natural Wetlands Treat and Reduce Pollutants**

I would like to stress the importance of relying on the natural biological  
functions of healthy wetlands to improve water quality. Their beneficial  
effects for the purposes of this program are well-proven, and yet it seems  
that they are given a minor role in the WQIP. Whereas structural BMPs can  
be as effective at reducing pollutants, natural wetlands do that and much  
more: they provide habitat for wildlife, open space buffers in urbanized  
areas, a place for people to connect with nature, an outdoor classroom for  
studies in the natural sciences, and much more. So from the standpoint of

*Mission: To protect, restore, and enhance the quality and beneficial uses of water, habitats, and other natural  
resources of the watersheds of the Carlsbad Hydrologic Unit and the adjacent coastal shoreline.*

cost-effectiveness, they are much better than a UV treatment plant, a detention basin, or a bio-swale.

Section E. Jurisdictional Runoff Management Programs, E.d.(2) states that the Co-permittees “must identify streams, channels, and/or habitats in areas of existing development as candidates for rehabilitation, focusing on areas where stream, channel, and/or habitat rehabilitation projects will address the highest priority water quality conditions identified in the WQIP. Yet wetlands restoration is hardly mentioned in these documents.

In the PowerPoint presentation at the last public meeting on July 7, a Stream Restoration Program was mentioned and briefly outlined as one of a number of Water Quality Improvement Strategies. However, in the WQIP documentation just released there is no mention of a Stream Restoration Program.

Here are some examples where this is mentioned as a strategy:

(P. 151) San Marcos HA (904.5) Page 127....

*“11) Optional Strategies –*

*\* Consider feasibility of developing an alternative compliance program, and if developed consider constructing structural controls to reduce priority water pollutants.*

*\* Investigate feasibility of developing a Green Streets Program”*

...and 23 more, mostly starting with "Consider..."

(P. 174) Escondido Creek HA (904.6) Page 150...

*“11) Optional Strategies-*

*\* Consider feasibility of developing an alternative compliance program, and if developed consider constructing structural controls to reduce priority water pollutants.*

*\* Investigate feasibility of developing a Green Streets Program...”*

...and 23 more, mostly starting with "Consider..."

(P. 152) *“... \* Investigate feasibility of stream, channel, and/or habitat rehabilitation projects and identify project partners”*

(P. 153) *“... \* Consider developing a strategy to evaluate opportunities to naturalize concrete stormwater conveyances, and identify potential funding sources (such as grants) for design and implementation”*

This seems to me to be pretty weak language and not very supportive of the strategy of using wetlands to reduce pollution.

### **(Offsite) Alternative Compliance Program**

Another component of the WQIP that we feel is effective and desirable is the (Offsite) Alternative Compliance Program. Although I could not find a definition of it anywhere, my

understanding is that it allows projects where onsite measures are very difficult or prohibitively expensive to do some compensating treatment elsewhere. This is favorable because it lends itself to wetlands preservation or restoration. However, I am not in favor of the alternative means being done in another watershed, because if the watershed has a pollution problem, compensating in another watershed will not relieve that problem. Also, I think it is important to emphasize the requirement that the alternative measures actually do measurably reduce the pollutants in question. The language in this regard is lacking.

### **Rainwater Harvesting and Greywater**

Rainwater harvesting can reduce pollutants, and since we're in a period of serious drought, we should be thinking of ways to capture rainwater in urban areas where pavement channelizes it into storm drains. Using methods such as curb cuts and bio-swales can reduce street pollutants in rain runoff, with the added benefit of reducing the need for imported water for landscaping, one of our largest areas of water consumption.

Rainwater harvesting is mentioned only twice as a strategy in the current WQIP document (same language in both cases):

*San Marcos HA (904.5), Page 127 and Escondido Creek HA (904.6), Page 149*

*"4) Promote Rain Barrel Incentive Programs – Promoting partners programs for rainwater harvesting rebates. Partner agencies including the MWD, local water districts, and the SDCWA.*

*Example: MWD - [www.socalwatersmart.com](http://www.socalwatersmart.com)"*

Rainwater harvesting may be implied in other strategies such as LID retrofit programs, but in only those two HAs is it mentioned it directly, and with no amplification or discussion.

The same can be said for greywater programs, which are mentioned only twice, in:

Table 9 – Sources Suggested by Public for Consideration (p. 231)

Table 4 - Sources Suggested by Public for Consideration (p. 275)

### **General Comments Regarding Development**

There is always pressure to compromise on the environment to accommodate development of land. It means jobs, money, livelihood, long-term plans of various kinds. In fact, our whole economy is based to a great extent on development of our landscapes. In essence, we're extracting our livelihood from these landscapes, not unlike in mining for minerals. And like with mining and other extractive activities, once these precious natural resources are used for development, they are gone, not to be brought back except by great expense, and even then not to their original quality and function.

I think it is time in our society to begin looking to the future, because we are dealing with a finite resource, and so our present course is not indefinitely sustainable. This seems to be becoming increasingly obvious every year. But it's hard to acknowledge this for those who have a stake in the outcome.

### **Difficulties with the documentation**

I found the recent release of documentation extremely difficult to navigate. I am using an up to date version of Adobe Reader. The Bookmark links on the left side were almost useless. For those who produced the documentation, they may have made sense. But for anyone else they were little help.

For example:

Bookmark link: *4 - Appendix C - B.3 Submittal*

Click on that link: *Carlsbad WMAA Attachments / ATTACHMENT B.2 / HYDROMODIFICATION MANAGEMENT EXEMPTION MAPPING (P. 341)*

Bookmark link: *5 - Appendix D - Carlsbad WMAA*

Click on that link: *Carlsbad WMAA Attachments / ATTACHMENT C / ELECTRONIC FILES (P. 354)*

Bookmark link: *3 - Appendix B - B.2 Submittal*

Click on that link: The WQIP as of June 11, 2014.

The use of Appendix and Attachment, since they have a similar meaning, was also confusing without further description of their contents. And if I was on any page in the collection of documents, I could not tell where I was, unless I remembered how I got there, which was unlikely. It is largely a problem of this being not one, but a collection of docs, each with their own set of page numbers. What is needed is a better and more extensive set of Bookmark links and a comprehensive table of contents listing all the separate documents and cross-referencing the page numbers as listed by Adobe or other pdf reader. Because of the limited in the amount of time I could devote to this and by my lack of expertise in this area, my review of this WQIP submittal is not as extensive as I would have liked.

Nonetheless, there are many good things in this WQIP, and I believe that if the Co-permittees follow this plan faithfully, I am hopeful that we will see improvements in water quality in the Carlsbad Watershed Management Area. I thank the Co-permittees, the Regional Water Quality Control Board, and Mikhail Ogawa Engineering for their hard work in putting this together.

Respectfully,

Brad Roth, Chairperson  
Carlsbad Watershed Network

(760) 436-2632