

July 31, 2015

Ms. Laurie Walsh via e-mail
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:

Thank you for the opportunity to comment on the DRAFT Carlsbad Watershed Management Area Water Quality Improvement Plan (WQIP). We have previously submitted comments on earlier versions and won't repeat those comments here. Since many of our comments were not directly addressed in the revised plan we hope that the Regional Board will still consider those comments in this DRAFT WQIP.

We support the comments submitted by San Diego Coastkeeper, especially relating to numerical goals and linking strategies to required outcomes. It should be a given that whichever strategies are chosen, they must be able to show measurably how they will achieve water quality standards. We support the concept of Alternative Compliance but there must be a net benefit to the resource of using that approach. If there is no way to measure the benefit and tie it directly back to the standards, how will you know you are complying with the Clean Water Act?

We also strongly concur with San Diego Coastkeeper's' comments about the role of trash in creating pollution in our creeks and watersheds. Trash is a significant source of pollution in all our urban creeks and must be considered as such in the WQIP. Our urban watersheds, including Escondido Creek, have areas where groups of people are using the creek to live, wash clothes, defecate and do drugs. In a recent cleanup event, 45 TECC volunteers worked on a one mile section of Escondido Creek removing 2,360 pounds of every item you would imagine including batteries and needles. Tragically, one of our volunteers said he had been in that same section of the creek decades earlier, doing the same type of volunteer cleanup, seeing similar piles of trash. Our creeks are not landfills but are being used as such.

While we will continue to provide volunteers to help enhance area water quality, our current approaches are clearly not addressing the core issues. We hope the Regional Board will use the opportunity provided by the WQIP to make meaningful, measureable, improvements in area water quality.

Thank you for your consideration. Please contact me at ann@landconserve.com or 858-442-0937 if I can answer any questions.

DocuSigned by:



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Executive Director

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