

Carlsbad Watershed

Input / Recommendation Matrix: Due February 21, 2014

Name:	Page number:	Section, Table, or Section of Permit to be addressed:	Recommendation/Input: (Be Specific)	Acknowledgement/Response:
Laurie Walsh	All	All	<p>This memo acts a summary of the work Carlsbad Water Quality Improvement Plan Responsible Agencies and the public have performed to date to identify priority and highest priority water quality conditions, sources of pollutants and/or stressors related to those identified priority and highest priority water quality conditions, and potential strategies for implementation to address identified priority and highest priority water quality conditions. The San Diego Water Board understands that the final Water Quality Improvement Plan will be more robust to include detailed findings and rationale behind the selected priority and highest priority water quality conditions, sources of pollutants and/or stressors, and potential strategies for improving the identified conditions. For example, the final list of priority water quality conditions must include (per section B.2.c.1) information on each condition including the beneficial use associated with the condition, the geographic and temporal extent of the condition, the Copermittees with discharges that may cause the condition, and an assessment of the adequacy of and data gaps in the monitoring data to characterize the condition(s) causing or contributing to the priority water quality condition, including a consideration of spatial and temporal variation. As presented, this memo does not include this level of discussion.</p>	
	8	Priority Water Quality Conditions – Bullet number 1 under the second paragraph	The term “etc.” should be removed because it is not specific to a condition identified in Table 1 or 2.	
	9	MS4 Sources of Pollutants and /or Stressors	<p>“Some sources are outside of the jurisdictional legal authority to regulate and are considered non-MS4 source contributors or non-MS4 sources.” The term non-MS4 source contributor is essentially same as non-MS4 source. For example, if aerial deposition is contributing to the priority water quality condition, then it is also a source of the condition. The document should be reviewed to determine if the use of one term (i.e. non-MS4 source) is more</p>	

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			appropriate and if it provides clarity to the document.	
	10	Table 3	The title of this Table, "MS4 Sources and Estimated Quantities" is confusing. The title leads the reader to believe that the numbers within the table are the estimated quantities of the pollutants, when in fact the numbers represent the acres of land covered by each land use within each sub watershed of the Watershed Management Area.	
	10	Table 3	Construction is listed as a Pollutant Generating Source within each subarea, however the number of acres under construction will change from year to year and potential discharges from construction sites is highly variable. The variability from construction sites should be closely evaluated during remainder of the Water Quality Improvement Plan development.	
	10	Table 3	Roads, Streets & Parking is listed as a Pollutant Generating Source within each subarea. Does the table correctly reflect zero & 1 acres of roads, streets, parking for each of the subareas? That seems low.	
	10	Table 3	In the final submittal of the Water Quality Improvement Plan, this table should include more description of the pollutant generating sources. For example, the municipal category is very general and could use some detail related to the types of facilities included under this category (e.g. office buildings versus fleet yards).	
	11	Table 4	"Impermeable Surfaces" should be added to the MS4 Sources as well. Municipalities own and operate impermeable surfaces as part of their municipal buildings and facilities.	
	11	Table 4	"Wide Trapezoidal Channel Sections" Are there instances where a wide trapezoidal channel sections are the responsibility of a Responsible Agency and therefore should be listed under an MS4 Source?	
	11	Table 4	"Other Non-MS4 Contribution *" category is highlighted with an asterisk; however the reason for the asterisk is not defined.	
	11	Potential Water Quality Strategies	Green Box – Targeted Audiences. Municipal Staff and Construction Staff are listed as examples of Targeted Audiences. Municipal Staff and Construction Staff are also a part of the Responsible Agencies	

