

Commenter	Date Received	#	Comment	Response to Comment
Matt Scanlon: California Department of Public Health (CDPH)	11/20/20	1	Table 6, Page 25; Section 3.3 Page 122; Appendix I <ul style="list-style-type: none"> The history of Agua Hedionda Lagoon Shellfish classification changes and their regulatory drivers are accurately described throughout the document. While the specific sources of fecal contamination may not be known, it may be beneficial to reiterate that avian roosting within the growing area has been determined to be a cause of elevated levels of fecal coliform by the 2003 TAC study 	<p>Thank you for the feedback. Language has been added to reflect findings from the 2003 TAC study.</p> <ul style="list-style-type: none"> Table 6. Added to fourth bullet for Agua Hedionda Lagoon as related to SHELL: “Source information: Specific source data is lacking at this time; however, a previous study conducted in 2003 determined that avian roosting within the growing area may be causing elevated fecal coliform concentrations.” (Agua Hedionda Lagoon Shellfish Technical Advisory Committee. <i>Investigating Potential Sources of Fecal Contamination to Aquacultural Production in Agua Hedionda Lagoon. Draft Report.</i> March 2003.) Source is currently noted in Section 3.3; no changes. Added statement to Appendix I, page 4 under the proposed Phase II strategies for SHELL: “Reports provided by CPDH discuss potential sources contributing to the elevated levels of fecal coliform, including Publicly Owned Treatment Works (POTW) and their discharge locations; avian sources within the growing area; runoff from the surrounding watershed, and circulation issues within the Outer Basin. (CDPH. Triennial Sanitary Survey Update Report: 2014-2016, Shellfish Growing Area Classification for Agua Hedionda Lagoon, California. June 2017.)”
		2	Section 3.3.5 Page 147 <ul style="list-style-type: none"> If the cities of Carlsbad and Vista, along with San Diego County, are developing a study regarding water quality conditions and shellfish harvest in the outer basin beyond the monitoring outlined in Phase I of Appendix I, CDPH has a direct interest in the implementation and findings of such a study and would want to be involved 	The Responsible Agencies appreciate the interest from CDPH as they are currently developing a Monitoring Framework to answer questions related to the SHELL beneficial uses in the Outer Basin of the Lagoon. The group will be reaching out to CDPH as the framework is developed and finalized to ensure that there are opportunities for engagement.
		3	Appendix I, Page 3, footnote 1 <ul style="list-style-type: none"> Rainfall and fecal coliform response were re-evaluated for the Agua Hedionda Lagoon growing area in the Triennial Sanitary Survey Update Report: 2017-2019 Shellfish Growing Area Classification For Agua Hedionda Lagoon, California, and the thresholds for “extreme weather events” were increased to rainfall greater than 1.50 inches over 24 hours or greater than 3.00 inches over 7 days. The sample to re-open requirement following these events is accurate. 	Footnote revised as follows: ¹ Beneficial uses for commercial shellfish harvesting are monitored and managed by CDPH. Open condition refers to dry weather conditions and rain events <0.4”. CDPH practice throughout the State is to suspend harvesting operations following rain events. In Agua Hedionda Lagoon the threshold for “closure” is defined as >0.4”. Once harvesting resumes after 72 hours of dry weather, a depuration process is implemented to ensure that the shellfish are safe for consumption. This is common practice due to the filter feeding nature of shellfish and is not indicative of beneficial use impairment, but rather practical management of shellfish harvesting operations to protect public health. In closures due to extreme weather events, defined as >1.5” over 24 hours or >3.00” over 7 days, a sample below NSSP thresholds is required to resume harvesting operations.
		4	The remainder of the document accurately characterized the findings and regulatory responsibilities of CDPH in regards to shellfish harvest and water quality. CDPH supports the priority status of water quality condition with indicator bacteria for SHELL beneficial use.	Comment noted and appreciate the feedback.
Paige DeCino: Consultation Panel Alternate- Environmental Community	11/20/20	5	I want to reiterate my concern about regular monitoring of Agua Hedionda Lagoon for bacteria given our North San Diego County Watershed Monitoring Program (NSDCWMP) data showing elevated <i>E. coli</i> in Agua Hedionda Creek at the eastern end of the lagoon. I understand the Responsible Agencies are working on a monitoring program to address this concern within the lagoon which is good to hear. I trust the results will also be available to the public. Our team at NSDCWMP will continue to share our data with you. It is also posted at our website .	Monitoring performed by Copermittees is provided in WQIP Annual Reports which are available to the public on the Project Clean Water website (www.projectcleanwater.org).
		6	While there appears to be no regulation for notifying REC-1 users of the inner lagoon of elevated bacterial levels, I would encourage the RAs to develop a plan on how to inform these users should thresholds be exceeded. Public health notifications should be a priority whether regulated or not.	Comment noted and appreciate the feedback.
Mary Anne Vine: Consultation Panel Member- Environmental Community	11/20/20	7	Thank you for the opportunity to serve as a consultation panel member for the 2021 WQIP update. I learned a lot and really appreciate the chance to serve my community this capacity. I also appreciate the work you do to maintain and protect the precious and outstanding natural resources located in the beautiful city of Carlsbad, that we all share.	Comment Noted.

Carlsbad Watershed 2021 WQIP Update – October 19, 2020 Public Review Draft

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		8	<p>In 2017-2018 a group of other concerned Carlsbad residents and I met with the SDWQCB and requested bacteria testing be performed during the summer months in the Aqua Hedionda lagoon areas where the public swims and does other types of water contact recreation.</p> <p>So I am excited and grateful to learn that the Jurisdictions and SDWQCB are working together to create a monitoring plan for regular measurement of bacteria levels to ensure REC-1 and SHELL water quality objectives and provisions per current SDWQCB regulations.</p> <p>Therefore, I will hold most of my comments until the draft monitoring plan is available for public consumption and comment. I would like to request at this point only that, for public health and safety reasons, provisions be put in place so the public can be made aware in a transparent and timely way of the monitoring plan's bacteria measurement results, if this hasn't been considered already; also the timing for the release of the draft monitoring plan document.</p>	Comment noted.
		9	<p>After our group met with SDWQCB back in 2017 2018 we decided to partner with SD Coastkeeper to form a water quality monitoring group for the Aqua Hedionda Creek. Later our group merged with Preserve Calavera's more-or-less recently water quality monitoring group. Combined resultant bacteria data historic trends suggest elevated bacteria levels discharging into the lagoon from the creek have been shared with you and through the Preserve Calavera website, the community at large, and we are happy to continue sharing our data.</p> <p>Recently, I am thrilled to say, Carlsbad's newest park has begun construction, as you are probably aware. This park will contain an extensive dry stream bed / bio-swale beautifully landscaped with native plants and will serves to protect and maintain Carlsbad's water quality and local ecology.</p> <p>I applaud the California Water Quality Control Board's decision to mandate bioswales and other types of bio-remedial infrastructure for new development. Unfortunately, the federal Clean Water Act is, generally-speaking, an end-of-pipe solution. Bioswales and other types of bio-remedial infrastructure can help reduce pollution at the source. This could be a pivotal step in the right in the right direction so that we no longer need to treat our precious creeks, lagoons and oceans like sewers.</p>	Comment noted
		10	<p>In conclusion, I would like to thank you and SDWQCB again for your response to public requests for the 2021 WQIP Update and I look forward to the draft monitoring plan document.</p>	Comment noted