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Carlsbad Watershed Network

## Member Organizations

Agua Hedionda Lagoon  
Foundation

August 25, 2015

Batiquitos Lagoon Foundation

To the Carlsbad City Council re Caruso Affiliated 85/15 Initiative for the south shore of Agua Hedionda Lagoon:

Buena Vista Lagoon  
Foundation

Canyons Network

Carlsbad Watershed Network is coalition of non-profit environmental groups whose mission is to protect the watersheds of the coastal North San Diego County, from Escondido Creek and San Elijo Lagoon north to Loma Alta Creek in Oceanside.

Cottonwood Creek  
Conservancy

The Escondido Creek  
Conservancy

Greater San Diego Resource  
Conservation District

We feel that the Caruso Affiliated plan for the south shore of Agua Hedionda Lagoon has some major flaws when it comes to protecting it from stormwater runoff from the development.

Preserve Calavera

San Elijo Lagoon  
Conservancy

Agua Hedionda is one of the few watersheds that actually has an adopted Watershed Management Plan - a comprehensive, scientifically based plan for preserving, restoring and enhancing watershed functions and minimizing future degradation. But you would never know there even was such a plan from reading Caruso's Environmental Analysis. One of the key recommendations of this plan is for using Low Impact Design for stormwater management - things like reducing impervious cover, extended detention facilities, grass swales, and permeable pavement. These are things that should be done first- to reduce the amount of water and pollution that runs off. After that you work on reducing pollutant loads.

Caruso's Environmental Analysis ignores this kind of good design to prevent run-off and does a haphazard job of preventing pollution from

*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.*

the commercial development and construction from affecting the lagoon. It has lists of Best Management Practices (or “BMPs”) for controlling pollution from stormwater runoff, but it does not specify which would be used or whether any of them are more effective than the others.

In fact, we know that measures which retain and infiltrate runoff are more effective than ones which just filter out pollutants. They allow run-off to slowly percolate into the soil, where natural processes filter and break down pollutants. Instead, Caruso proposes to use structural filters, which do not remove all pollutants and are much less effective than retention methods. In a sensitive area like this, with sandy soils above a lagoon, the most effective method is the one that should be used- not the cheapest one.

Using methods that retain runoff have the advantage of potentially harvesting the rainwater for other uses, such as landscaping irrigation. This is not considered in the Caruso plan -despite our continuing drought.

Their plan will actually increase some pollutants, which they consider acceptable. Some of those pollutants are heavy metals that are highly toxic to marine life.

The handling of trash and street litter is given one sentence in the Environmental Analysis. And people have been told dogs will be allowed on the trails, but adding dogs to these areas requires major efforts to control dog waste. Also, 22 acres of off-site land will drain onto the project site- but that wasn't even addressed.

So with the Caruso project we get poor site design that increases run-off and a bad selection of stormwater controls that actually increases some pollutants very toxic to marine life. This tells us that Caruso Affiliated does not take these issues seriously and shows reckless disregard for the protection of Agua Hedionda Lagoon. This is one more reason it is critical to let the people vote on this development.

Thank you for your consideration,

Brad Roth, Chairperson  
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