



Brad Roth

Chairperson of the Carlsbad Watershed Network
bwmoth@gmail.com

August 20, 2015 / Press Conference

Caruso's plan for the south shore of Agua Hedionda Lagoon has some major flaws when it comes to protecting it from runoff from the development.

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. Those 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 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, measures which retain and infiltrate runoff are more effective than ones which filter out pollutants. They allow run-off to slowly percolate into the soil, where natural processes filter out 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 the runoff also have the advantage of potentially harvesting the water for other uses, such as landscaping irrigation. This is not considered in the Caruso plan -despite continuing drought conditions.

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

The handling of trash and street litter is given scant attention in the plan. And people have been told dogs will be allowed on the trails, and 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. We consider this reckless disregard for the protection of Agua Hedionda Lagoon. This is just one of the reasons why we think it is critical to let the people vote on this development.

The Carlsbad Watershed Network is a 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.