



July 9, 2014

Laurie Walsh
San Diego Regional Water Quality Control Board
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SAN DIEGO, CALIFORNIA 92106

WWW.SDcoastkeeper.org

IMPACT

Re: San Diego Coastkeeper's comments on Draft WQIPs for Carlsbad; Permit No. R9-2013-0001 (MS4 Permit).

Sent via email

Dear Ms. Walsh and Carlsbad WQIP Copermittees:

San Diego Coastkeeper is the leading watchdog organization in San Diego County exclusively dedicated to the protection and restoration of fishable, swimmable, and drinkable waters in San Diego County. San Diego Coastkeeper has a long-standing involvement in, and commitment to, water quality in our region, including the Regional Water Quality Control Board's permits related to regulation of stormwater pollution and urban runoff.

Coastkeeper is committed to ensuring that the beneficial uses of our region's water bodies are protected and restored. Our staff, members, and allied organizations serve alongside you on the Water Quality Improvement Panels that are working to develop the water quality protection plans required under the MS4 permit. Coastkeeper played an active role in the development and adoption of the new MS4 stormwater permit and it is our hope that these comments allow the appropriate implementation of the permit and meaningful development of the WQIPs throughout our region. Our goal is to ensure that the Water Quality Improvement Plans (WQIPs) will effectively implement the standards of protection under the Clean Water Act and the MS4 permit while realizing the outcomes-oriented approach of the permit through appropriate strategies. Thank you for this opportunity to comment on the process and outputs to date.

Coastkeeper sincerely appreciates the time and effort put into the development and implementation of the permit and the Carlsbad WQIP to date by the Board staff and Copermittee staff and consultants, especially given the time and other constraints facing them.

Please accept these public comments on the Carlsbad draft WQIP first deliverable on behalf of our organization and its many members.

Public Participation Process:

As with other already submitted WQIPs, San Diego Coastkeeper requests that moving forward, the Project Clean Water Clearinghouse website contain each panelist comment made and every draft version for each watershed so that interested non-panelist members of the public may review all materials and their evolution towards finalization. While input from the general public is not officially taken until Regional Board submittal, members of the public should be allowed to access all pertinent data throughout the process to enable it to be as transparent as possible.

Subdividing Watersheds:

The MS4 permit §II.B.2 allows for Watershed Management Areas (WMAs) to be separated into subwatersheds to focus water quality prioritization and jurisdictional runoff management program implementation efforts by receiving waters. In fact, the Fact Sheet of the MS4 permit at page F-44 encourages subdividing, stating “The Copermittees are encouraged to separate the WMA into subwatersheds, as appropriate. This allows the Copermittees to identify priorities applicable to a subset of the Copermittees or specific water bodies or areas within the WMA”.

Coastkeeper is pleased to see the Carlsbad WQIP follow this recommendation and subdivide the watershed by receiving water bodies. In this case, subdividing will allow each chosen receiving water HPWQC to be associated with numeric interim and final goals, allowing for further documentation of progress. Further, by subdividing the watershed the Copermittees were able to postpone the adoption of a new TMDL for biostimulatory substances by designating nutrients as the HPWQC in Loma Alta Slough. Whether the strategies chosen will be adequate enough to comply with the TMDL and MS4 permit requirements remains to be seen, but it is encouraging to see a WQIP draft that subdivides by receiving water rather than simply rely on a watershed-wide TMDL (bacteria) for designating a single watershed-wide HPWQC. Coastkeeper hopes other watershed WQIP Copermittees follow suit and subdivide watersheds by receiving water to allow for a more detailed and focused picture of highest priority constituents, impairments, and strategies.

Determination of HPWQCs:

The Carlsbad WQIP uses a Multiple Lines of Evidence Approach in identifying PWQCs and HPWQCs. In this case it appears the same MLOE methodology was used in the initial WQIP drafts circulated to Consultation Panel members earlier in 2014 that was used in this draft submitted to the Board. In the initial draft, bacteria was chosen based on the MLOE approach as the single HPWQC for Loma Alta Slough. In this new submitted draft, however, use of the same MLOE approach with what appears to be the same data resulted instead in nutrients being designated as the single HPWQC for Loma Alta. While some subjectivity is inevitable in prioritization methodologies, the desire to escape implementation of a TMDL for nutrients in Loma Alta appears to be the sole determining factor in this bacteria-to-nutrients change (i.e. the prospect of a new “regulatory driver”). In order for these WQIP methodologies to have some level of objective validity it is recommended that the determinations made under the chosen methodologies not be subject to strategic or regulatory whims or largely, if not wholly, dependent on best professional judgment. In this case, Coastkeeper proposes the designation of both bacteria and nutrients as HPWQCs in Loma Alta under the MLOE approach, as the approach equally supports both priorities and existing data and numerical goals and schedules are available for both.

Copermittees have suggested that listing more than one HPWQC within a jurisdiction or geographical area is not feasible at this time.¹ However, since strategies exist that may be equally as effective at addressing one HPWQC as another, listing multiple HPWQCs for a single

¹ See April 11, 2014 Memorandum from MOE to Carlsbad Watershed Management Area WQIP Consultation Panel Members, p. 2. “Multiple HPWQCs within the same geographic areas are not feasible at this time.”

receiving water body would still allow numeric goals to be designated and achieved if proper multi-beneficial strategies are chosen.

Finally, Coastkeeper data (see attached excel charts and data) considered alongside the additional MLOE information and data suggests that nitrates would be a more appropriate HPWQC for Escondido Creek than bacteria. We ask that the attached data sheet be made part of the total data set available for MLOE consideration moving forward.

Potential Strategies:

Section F.1.a.2. of the permit *requires* Copermittees to include all the potential water quality improvement strategies identified by the public and the WQIP Consultation Panel with the submittal of the priority water quality conditions to the Board. For any strategies that have been recommended but not yet included upon this submittal, Coastkeeper respectfully requests that the Board ensures Copermittees have included all potential strategies available so the totality of strategies are not prematurely narrowed. Several Copermittees (including both the City and County of San Diego) are conducting workgroups, technical advisory committees, and studies aimed at investigating which strategies are most beneficial to water quality and that fit our local and regional environment. Coastkeeper applauds these efforts by these Copermittees and hopes the Copermittees within the Carlsbad WMA will initiate similar undertakings if they have not already planned on doing so. At this early stage, all potential strategies must remain on the table.

To that end, Coastkeeper requests the inclusion of the following possible strategies the Carlsbad draft WQIP to the extent that they are not already included:

1. Incentivization and regulation of private actors to adopt and implement distributed and/or centralized BMPs throughout the watershed on private property.
2. Implementation of a Stormwater Utility, the purpose of which is to raise the necessary funding to implement stormwater plans and requirements. In instances where funding is inadequate, include a strategy to raise funding levels and appropriations toward compliance.
3. Public-private partnerships, private-NGO partnerships, and public-NGO partnerships aimed at best management practice (BMP) implementation (structural and non-structural, source control and technological control) on private and public property.
4. Increased enforcement against polluters and illicit dischargers. Where capacity or funding is an issue, include a strategy to increase funding and capacity to allow for additional enforcement.
5. Strategies *must include* additional regulation and/or enforcement of MS4 and non-MS4 sources of pollutants in water bodies. Examples to be included are (a) the regulation of sites that may be contributors to pollutants in the MS4 system, (b) regulation of non-MS4 activities that ultimately impact the MS4 or receiving waters, and (c) regulation of non-compatible uses or practices within a jurisdiction to help eliminate MS4 pollutant sources. Such potential strategies regulation or protocols *must include*: land use regulations/amendments; development moratoriums; zoning amendments; irrigation scheduling, management, and BMPs; pesticide application regulations and prohibitions;

regulations requiring and incentivizing distributed BMPs and requiring maintenance of distributed BMPs, and increased overall enforcement.

6. Green infrastructure projects that serve as jurisdictional compliance BMPs, and that may also serve concurrently as Alternative Compliance BMPs. An example might be a constructed wetland or stream rehabilitation, implemented by a Copermittee towards compliance, the scope of which may be broadened in conjunction or partnership with an Alternative Compliance project that absolutely ensures operations and maintenance in perpetuity, perhaps through an endowment or trust.
7. Any and all green infrastructure or “multi-use treatment area” BMPs for which there exists current data on effectiveness. At a minimum these must include: “green streets”, bioretention, infiltration, swales, rain gardens, downspout disconnections, green roofs, rainwater harvesting, porous pavements, wetlands, and land conservation.
8. Partnerships and information sharing with NGOs (including San Diego Coastkeeper) and the Board towards enforcement actions against polluters/illicit dischargers impairing receiving waters.
9. Capture and use of stormwater to augment imported water supplies and to reduce flows in the MS4.
10. Stream, channel, habitat, and wetlands restoration and other projects that restore both physical stream channel conditions and lost ecosystem services, and that have the potential to provide multiple water quality and societal and recreational benefits.
11. Implementation of BMPs with multiple benefits in addition to improved water quality, such as those benefiting public health, habitat creation, and additional recreational activities.
12. Strengthening of Jurisdictional Runoff Management Programs and implementation.
13. Strategies that address multiple PWQCs to a significant degree, especially in the case where multiple HPWQCs may be listed in the same geographical area, subwatershed, or watershed.

Coastkeeper sincerely appreciates the time and effort put into the development and implementation of the permit and the Carlsbad WQIP plan to date by the Board, Copermittees, consultants, and staff. We continue to believe the permit as written serves as a good starting point towards achieving greatly improved water quality related to MS4 in our region. In order to achieve the purposes of the permit and fishable, swimmable waters in San Diego County, it is important that the permit’s potential be realized through collaborative and informed implementation, taking into consideration a wide variety of both proven and innovative approaches, and all available data on water quality conditions.

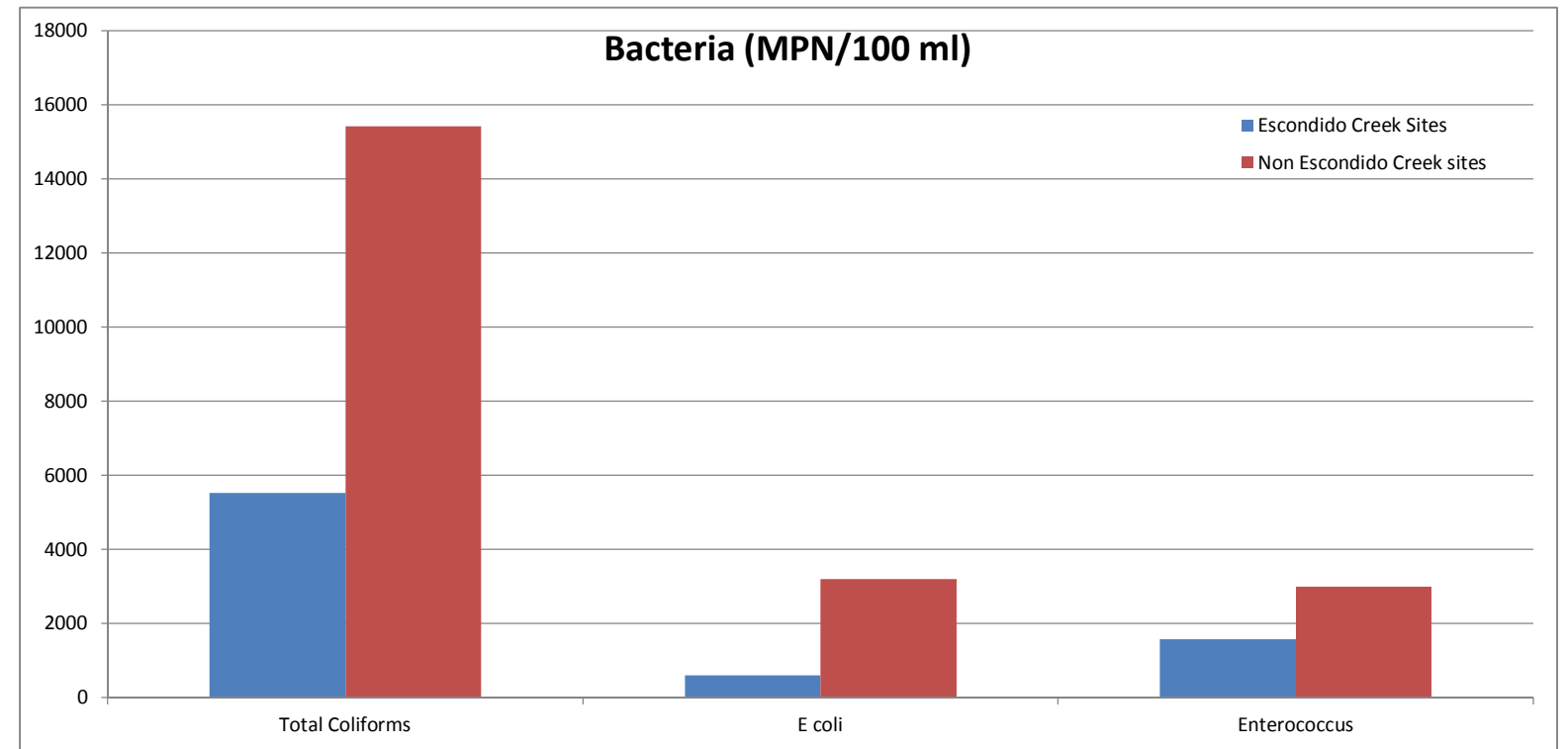
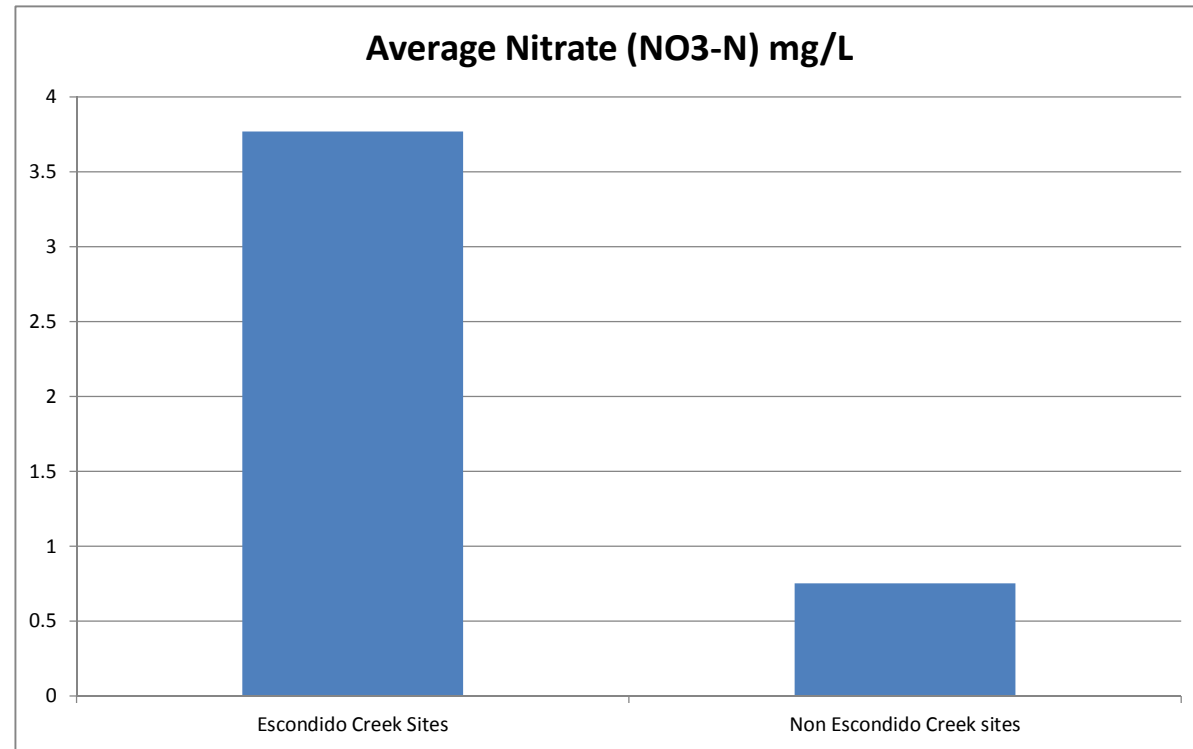
Thank you for this opportunity to comment on the Carlsbad WQIP draft to date. Please feel free to contact me with any questions you might have. Coastkeeper looks forward to remaining engaged in the MS4 permit implementation and WQIP development process, and to partnering with Board and Copermittee representatives and staff.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. O'Malley", with a long, sweeping flourish extending to the right.

Matt O'Malley
Waterkeeper
Legal & Policy Director

	Escondido Creek Sites	Non Escondido Creek sites	Escondido Creek Sites	Non Escondido Creek sites
Nitrate	3.766917476	0.753047352	Total Colifo	5526.134078
			E coli	3204.46129
			Enterococc	2996.561039



StationCode	Watershed	SampleDate	E_Coli	Enterococcus	Nitrate (NO3-N)	Total Coliforms
EDC-010	Carlsbad Watershed	12/Jan/2009	160	370	1.17	4610
EDC-010	Carlsbad Watershed	21/Mar/2009			3.73	
EDC-010	Carlsbad Watershed	17/May/2009	130		1.5	
EDC-010	Carlsbad Watershed	13/Mar/2010	50	160	4.14	2490
EDC-010	Carlsbad Watershed	15/May/2010	150	120	2.19	2990
EDC-010	Carlsbad Watershed	12/Jun/2010	90	120	1.78	2980
EDC-010	Carlsbad Watershed	17/Jul/2010	200	150	1.06	3440
EDC-010	Carlsbad Watershed	21/Aug/2010	40	110	0.476	980
EDC-010	Carlsbad Watershed	23/Oct/2010	420	1940	0.962	10460
EDC-010	Carlsbad Watershed	20/Nov/2010	440	110	3.7	3870
EDC-010	Carlsbad Watershed	18/Dec/2010	7700	10460	3.29	24192
EDC-010	Carlsbad Watershed	15/Jan/2011	30	90	5.82	2990
EDC-010	Carlsbad Watershed	12/Feb/2011	30		6.1	1420
EDC-010	Carlsbad Watershed	19/Mar/2011	90	150	4.49	1730
EDC-010	Carlsbad Watershed	16/Apr/2011	360	230	4	1900
EDC-010	Carlsbad Watershed	21/May/2011	380	440	2.69	5010
EDC-010	Carlsbad Watershed	11/Jun/2011	90	280	2.99	3440
EDC-010	Carlsbad Watershed	16/Jul/2011			2.12	
EDC-010	Carlsbad Watershed	10/Sep/2011	150	160	1.33	3130
EDC-010	Carlsbad Watershed	15/Oct/2011	210	110	2.93	3870
EDC-010	Carlsbad Watershed	19/Nov/2011	180		2.92	3820
EDC-010	Carlsbad Watershed	25/Feb/2012	120	130	3.01	1220
EDC-010	Carlsbad Watershed	17/Mar/2012	150	110	2.37	3080
EDC-010	Carlsbad Watershed	21/Apr/2012	320	280	2.11	1950
EDC-010	Carlsbad Watershed	19/May/2012	720	110	1.58	2990
EDC-010	Carlsbad Watershed	23/Jun/2012	340	280	1.58	3450

EDC-010	Carlsbad Watershed	21/Jul/2012	580	190	1.15	2720
EDC-010	Carlsbad Watershed	18/Aug/2012	150		0.658	1780
EDC-010	Carlsbad Watershed	22/Sep/2012	200		1.03	1940
EDC-010	Carlsbad Watershed	20/Oct/2012	1190	230		14140
EDC-010	Carlsbad Watershed	17/Nov/2012			2.94	
EDC-010	Carlsbad Watershed	15/Dec/2012			2.8	
EDC-010	Carlsbad Watershed	26/Jan/2013	3260	15530	0.912	24190
EDC-010	Carlsbad Watershed	23/Feb/2013	490	260	0.701	13000
EDC-010	Carlsbad Watershed	16/Mar/2013	100	230	2.38	2250
EDC-010	Carlsbad Watershed	20/Apr/2013	100	110	2.18	1300
EDC-010	Carlsbad Watershed	18/May/2013	130	330	0.812	3130
EDC-010	Carlsbad Watershed	22/Jun/2013	70	160	0.45	4350
EDC-010	Carlsbad Watershed	20/Jul/2013	200	300	0.23	2850
EDC-010	Carlsbad Watershed	14/Sep/2013	190	150	0.233	930
EDC-010	Carlsbad Watershed	19/Oct/2013	130	170	0.815	6130
EDC-010	Carlsbad Watershed	16/Nov/2013	70	100	0.983	1920
EDC-010	Carlsbad Watershed	14/Dec/2013	30	90	2.07	1220
EDC-010	Carlsbad Watershed	25/Jan/2014	70	90	2.41	790
EDC-020	Carlsbad Watershed	12/Jan/2009	150	1130	1.23	3780
EDC-020	Carlsbad Watershed	21/Mar/2009			3.57	
EDC-020	Carlsbad Watershed	17/May/2009	360		1.4	
EDC-020	Carlsbad Watershed	13/Mar/2010	130	250	4.45	2850
EDC-020	Carlsbad Watershed	15/May/2010	190	220	2.7	5790
EDC-020	Carlsbad Watershed	12/Jun/2010	140	370	2.22	2920
EDC-020	Carlsbad Watershed	17/Jul/2010	170	50	1	1840
EDC-020	Carlsbad Watershed	21/Aug/2010	120	130	0.903	1420

EDC-020	Carlsbad Watershed	23/Oct/2010	410	1020	2.27	13000
EDC-020	Carlsbad Watershed	20/Nov/2010	280	560	3.98	3870
EDC-020	Carlsbad Watershed	18/Dec/2010	4350	17330	1.35	24192
EDC-020	Carlsbad Watershed	15/Jan/2011	40	110	6.46	2850
EDC-020	Carlsbad Watershed	12/Feb/2011	30		5.95	1210
EDC-020	Carlsbad Watershed	19/Mar/2011	80	160	5.02	1070
EDC-020	Carlsbad Watershed	16/Apr/2011	180	110	4.18	2700
EDC-020	Carlsbad Watershed	21/May/2011	600	340	3.07	7270
EDC-020	Carlsbad Watershed	11/Jun/2011	190	440	3.92	1500
EDC-020	Carlsbad Watershed	16/Jul/2011			2.64	
EDC-020	Carlsbad Watershed	10/Sep/2011	160	310	1.29	1540
EDC-020	Carlsbad Watershed	15/Oct/2011	100	170	3.02	7270
EDC-020	Carlsbad Watershed	19/Nov/2011	140		3.33	3040
EDC-020	Carlsbad Watershed	25/Feb/2012	50	160	3.41	2400
EDC-020	Carlsbad Watershed	17/Mar/2012	2190	1960	2.54	12030
EDC-020	Carlsbad Watershed	21/Apr/2012	410	230	2.48	2600
EDC-020	Carlsbad Watershed	19/May/2012	350	690	1.83	2400
EDC-020	Carlsbad Watershed	23/Jun/2012	130	350	1.16	2500
EDC-020	Carlsbad Watershed	21/Jul/2012	30	100	1.55	1640
EDC-020	Carlsbad Watershed	18/Aug/2012	130		1.57	930
EDC-020	Carlsbad Watershed	22/Sep/2012	100		1.33	890
EDC-020	Carlsbad Watershed	20/Oct/2012	710	260		9210
EDC-020	Carlsbad Watershed	17/Nov/2012			3.48	
EDC-020	Carlsbad Watershed	15/Dec/2012			3.05	
EDC-020	Carlsbad Watershed	26/Jan/2013	2490	24190	0.784	24190
EDC-020	Carlsbad Watershed	23/Feb/2013	470	260	0.834	9810

EDC-020	Carlsbad Watershed	16/Mar/2013	160	640	2.61	4350
EDC-020	Carlsbad Watershed	20/Apr/2013	120	290	1.93	1500
EDC-020	Carlsbad Watershed	18/May/2013	230		0.941	3870
EDC-020	Carlsbad Watershed	22/Jun/2013	160	200	0.472	4610
EDC-020	Carlsbad Watershed	20/Jul/2013	90	320	0.335	1180
EDC-020	Carlsbad Watershed	14/Sep/2013	320	170	0.486	1470
EDC-020	Carlsbad Watershed	19/Oct/2013	160	160	1.21	5790
EDC-020	Carlsbad Watershed	16/Nov/2013	160	100	2.23	2060
EDC-020	Carlsbad Watershed	14/Dec/2013	70	110	2.25	1050
EDC-020	Carlsbad Watershed	25/Jan/2014	70	60	2.49	830
EDC-030	Carlsbad Watershed	12/Jan/2009	120	90	2.47	2310
EDC-030	Carlsbad Watershed	21/Mar/2009			6.77	
EDC-030	Carlsbad Watershed	17/May/2009	130		4.9	
EDC-030	Carlsbad Watershed	18/Jul/2009	40	150	3.37	24190
EDC-030	Carlsbad Watershed	13/Mar/2010	10	40	6.38	3040
EDC-030	Carlsbad Watershed	15/May/2010	20	50	4.91	1440
EDC-030	Carlsbad Watershed	12/Jun/2010	100	30	5.06	650
EDC-030	Carlsbad Watershed	17/Jul/2010	50	110	0.23	440
EDC-030	Carlsbad Watershed	21/Aug/2010	30	20	3.09	990
EDC-030	Carlsbad Watershed	20/Nov/2010	240	180	6.38	2850
EDC-030	Carlsbad Watershed	18/Dec/2010	6130	17330	1.06	24190
EDC-030	Carlsbad Watershed	15/Jan/2011	40	170	8.19	3450
EDC-030	Carlsbad Watershed	12/Feb/2011	50		8.64	770
EDC-030	Carlsbad Watershed	19/Mar/2011	50	70	6.98	740
EDC-030	Carlsbad Watershed	16/Apr/2011	60	100	5.9	1390
EDC-030	Carlsbad Watershed	21/May/2011	90	380	5.75	11200

EDC-030	Carlsbad Watershed	11/Jun/2011	120	150	6.4	1350
EDC-030	Carlsbad Watershed	16/Jul/2011			3.16	
EDC-030	Carlsbad Watershed	10/Sep/2011	20	60	3.69	1070
EDC-030	Carlsbad Watershed	15/Oct/2011	90	100	5.37	2310
EDC-030	Carlsbad Watershed	19/Nov/2011	40		6.17	1790
EDC-030	Carlsbad Watershed	25/Feb/2012	150	90	5.33	1540
EDC-030	Carlsbad Watershed	17/Mar/2012	1270	740	4.83	5770
EDC-030	Carlsbad Watershed	21/Apr/2012	20	170	4.79	1160
EDC-030	Carlsbad Watershed	19/May/2012			3.76	
EDC-030	Carlsbad Watershed	23/Jun/2012	50	1260	3.96	1470
EDC-030	Carlsbad Watershed	21/Jul/2012	20	120	4.73	5790
EDC-030	Carlsbad Watershed	18/Aug/2012	40		3.74	810
EDC-030	Carlsbad Watershed	22/Sep/2012	100		3.94	890
EDC-030	Carlsbad Watershed	20/Oct/2012	160	160		8660
EDC-030	Carlsbad Watershed	17/Nov/2012			5.32	
EDC-030	Carlsbad Watershed	15/Dec/2012			2.44	
EDC-030	Carlsbad Watershed	26/Jan/2013	4110	24190	0.753	24190
EDC-030	Carlsbad Watershed	23/Feb/2013	230	210	0.755	4880
EDC-030	Carlsbad Watershed	16/Mar/2013	60	70	4.25	1900
EDC-030	Carlsbad Watershed	20/Apr/2013	260	70	4.68	1390
EDC-030	Carlsbad Watershed	18/May/2013	130	160	2.9	3080
EDC-030	Carlsbad Watershed	22/Jun/2013			2.7	
EDC-030	Carlsbad Watershed	20/Jul/2013	30	40	2.21	2190
EDC-030	Carlsbad Watershed	14/Sep/2013	30	60	2.29	480
EDC-030	Carlsbad Watershed	19/Oct/2013	100	160	3.27	2110
EDC-030	Carlsbad Watershed	16/Nov/2013	2250	600	4.55	9800

EDC-030	Carlsbad Watershed	14/Dec/2013	60	120	5.99	1270
EDC-030	Carlsbad Watershed	25/Jan/2014	10	50	5	670
EDC-040	Carlsbad Watershed	12/Jan/2009	400	460	4.6	6130
EDC-040	Carlsbad Watershed	21/Mar/2009			5.13	
EDC-040	Carlsbad Watershed	17/May/2009	60		3.87	
EDC-040	Carlsbad Watershed	18/Jul/2009	40	180	3.2	24190
EDC-040	Carlsbad Watershed	23/Oct/2010	410	770	5.17	19860
EDC-040	Carlsbad Watershed	20/Nov/2010	340	90	7	4610
EDC-040	Carlsbad Watershed	18/Dec/2010	4610	14140	1.41	24192
EDC-040	Carlsbad Watershed	15/Jan/2011	150	230	10.1	5480
EDC-040	Carlsbad Watershed	12/Feb/2011	250		8.92	1730
EDC-040	Carlsbad Watershed	19/Mar/2011			8.6	
EDC-040	Carlsbad Watershed	16/Apr/2011	150	280	6.74	2500
EDC-040	Carlsbad Watershed	21/May/2011	180	460	5.81	12030
EDC-040	Carlsbad Watershed	11/Jun/2011	200	200	6.8	5790
EDC-040	Carlsbad Watershed	16/Jul/2011			6.22	
EDC-040	Carlsbad Watershed	10/Sep/2011	70	140	5.24	2720
EDC-040	Carlsbad Watershed	15/Oct/2011	210	60	6.68	3650
EDC-040	Carlsbad Watershed	19/Nov/2011			6.73	
EDC-040	Carlsbad Watershed	25/Feb/2012	120	10	6.06	1790
EDC-040	Carlsbad Watershed	17/Mar/2012	1050	130	5.81	5170
EDC-040	Carlsbad Watershed	21/Apr/2012	300	240	5.29	2850
EDC-040	Carlsbad Watershed	19/May/2012	240	60	5.16	1840
EDC-040	Carlsbad Watershed	23/Jun/2012	30	50	4.92	410
EDC-040	Carlsbad Watershed	21/Jul/2012	100	360	5.39	1220
EDC-040	Carlsbad Watershed	18/Aug/2012	120		4.38	1660

EDC-040	Carlsbad Watershed	22/Sep/2012	110		4.21	2610
EDC-040	Carlsbad Watershed	20/Oct/2012	130	210		7700
EDC-040	Carlsbad Watershed	17/Nov/2012			6.26	
EDC-040	Carlsbad Watershed	15/Dec/2012			2.68	
EDC-040	Carlsbad Watershed	26/Jan/2013	2760	24190	1.61	24190
EDC-040	Carlsbad Watershed	23/Feb/2013			4.16	
EDC-040	Carlsbad Watershed	16/Mar/2013	60	70	5.23	1580
EDC-040	Carlsbad Watershed	20/Apr/2013	20	200	4.76	880
EDC-040	Carlsbad Watershed	18/May/2013	90	230	3.35	2500
EDC-040	Carlsbad Watershed	22/Jun/2013	30	160	3.42	4880
EDC-040	Carlsbad Watershed	20/Jul/2013	10	160	3.17	1970
EDC-040	Carlsbad Watershed	14/Sep/2013	60	100	3.27	3080
EDC-040	Carlsbad Watershed	19/Oct/2013	40	140	4.22	3870
EDC-040	Carlsbad Watershed	16/Nov/2013	3260	2050	5.79	15530
EDC-040	Carlsbad Watershed	14/Dec/2013	110	110	5.71	1790
EDC-040	Carlsbad Watershed	25/Jan/2014		20	5.63	
EDC-050	Carlsbad Watershed	12/Jan/2009	3650	2400	3.73	24190
EDC-050	Carlsbad Watershed	21/Mar/2009			4.7	
EDC-050	Carlsbad Watershed	17/May/2009	30		4.97	
EDC-050	Carlsbad Watershed	18/Jul/2009	40	690	4	10110
EDC-050	Carlsbad Watershed	23/Oct/2010	460	1140	5.64	24190
EDC-050	Carlsbad Watershed	20/Nov/2010	1960	930	6.9	11200
EDC-050	Carlsbad Watershed	18/Dec/2010	6130	12030	1.96	24192
EDC-050	Carlsbad Watershed	15/Jan/2011	100	120	7.4	2720
EDC-050	Carlsbad Watershed	12/Feb/2011	90		7.6	2760
EDC-050	Carlsbad Watershed	19/Mar/2011	230	130	6.75	1840

EDC-050	Carlsbad Watershed	16/Apr/2011	110	270	6.27	2600
EDC-050	Carlsbad Watershed	21/May/2011	120	1080	5.87	7700
EDC-050	Carlsbad Watershed	11/Jun/2011	240	360	6.16	8160
EDC-050	Carlsbad Watershed	16/Jul/2011			6.09	
EDC-050	Carlsbad Watershed	10/Sep/2011	220	240	4.84	2720
EDC-050	Carlsbad Watershed	15/Oct/2011	220	330		6870
EDC-050	Carlsbad Watershed	19/Nov/2011	220		6.86	24190
EDC-050	Carlsbad Watershed	25/Feb/2012	190		6.06	3780
EDC-050	Carlsbad Watershed	17/Mar/2012	550	1040	5.34	4880
EDC-050	Carlsbad Watershed	21/Apr/2012	300	750	5.34	4610
EDC-050	Carlsbad Watershed	19/May/2012	430	340	5.17	3450
EDC-050	Carlsbad Watershed	23/Jun/2012	30	100	5.32	3440
EDC-050	Carlsbad Watershed	21/Jul/2012	70	100	6.71	5170
EDC-050	Carlsbad Watershed	18/Aug/2012	90		5.38	14140
EDC-050	Carlsbad Watershed	22/Sep/2012	60		5.61	11200
EDC-050	Carlsbad Watershed	20/Oct/2012	10	10		10
EDC-050	Carlsbad Watershed	17/Nov/2012			6.06	
EDC-050	Carlsbad Watershed	15/Dec/2012			2.2	
EDC-050	Carlsbad Watershed	26/Jan/2013	3080	24190	1.55	24190
EDC-050	Carlsbad Watershed	23/Feb/2013			4.8	
EDC-050	Carlsbad Watershed	16/Mar/2013	20	70	4.67	2010
EDC-050	Carlsbad Watershed	20/Apr/2013	30	100	0.23	1890
EDC-050	Carlsbad Watershed	18/May/2013	190	440	4.3	5790
EDC-050	Carlsbad Watershed	22/Jun/2013	10	120	4.07	2180
EDC-050	Carlsbad Watershed	20/Jul/2013	10	100	4.12	4160
EDC-050	Carlsbad Watershed	14/Sep/2013	60	30	4.12	8160

EDC-050	Carlsbad Watershed	19/Oct/2013	80	320	4.88	9210
EDC-050	Carlsbad Watershed	16/Nov/2013	24190	24190	3.55	
EDC-050	Carlsbad Watershed	14/Dec/2013	380	590	5.61	2490
EDC-050	Carlsbad Watershed	25/Jan/2014	40	110	5.68	2280