



09-07-2021

To the attention of: Chair Cantú, Vice-Chair Olson, Board Members Abarbanel, Anderson, Blair, Strawn and Warren

RE: San Diego Water Board Practical Vision: A Strategic Plan

Dear Chair Cantú,

Sierra Club San Diego Chapter is pleased to provide comments on the Regional Board's Practical Vision. Our review considered both the individual subsections and the totality of the Practical Vision. We also evaluated the 2013 Practical Vision as a benchmark of consistency and best practices implementation in this 2021 Practical Vision. In short, we applaud staff's comprehensive efforts to the direction of your Board.

Sierra Club is particularly impressed with **chapter 5, Partner and Consult with Tribal Nations**. All San Diegans have benefited from the inherent environmental sustainability fostered by some 600 generations of indigenous people. We must be reminded that many of our most revered institutions, such as UCSD and SDSU, are located on unceded Kumeyaay territory. The Regional Board is wise to recognize the enduring environmental caring legacy of indigenous people. These actions highlight the San Diego Regional Board exhibiting statewide leadership in Tribal partnership and consultation. Sierra Club San Diego extends our appreciation to staff for their initial undertaking of this significant Region 9 Board goal.

Implementing Racial Equity and Environmental Justice Measures are matters of great importance which political bodies and agencies are facing every day, with many stumbling on the very definition of effective implementation. Tentative

steps, half measures and lack of support by electeds has in some cases led to untenable positions for government staff. We find no evidence of conflicts in these clear-cut directives for Regional Board staff. The challenges we do see for electeds and city staff lies in not recognizing and evaluating 100+years of various periods of racism, environmental destruction, and lasting contamination of waterways in our San Diego region communities of concern. Sierra Club appreciates staff determining El Cajon, Chollas, San Ysidro, Barrio Logan, Southeast San Diego, western National City and Chula Vista as priorities and deserving of focused attention and regulatory actions as required.

There are developing corollary concerns we consider dynamic and important to your board in these rapidly changing times. Please understand the following are anticipated Environmental and Social Justice conundrums your board may be considering in the next six months in concert with the Practical Vision.

- **Water Agency shutoffs** for lack of payment will soon be re-instituted across Region 9.
- **The Human Right to Water:** Funding and implementation challenges: From the state water board:

On September 25, 2012, Governor Edmund G. Brown Jr. signed Assembly Bill (AB) 685, making California the first state in the nation to legislatively recognize the human right to water. Now in the Water Code as Section 106.3, the state statutorily recognizes that “every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes.” The human right to water extends to all Californians, including disadvantaged individuals and groups and communities in rural and urban areas.

- **The Climate Emergency** we face is unrelenting, accelerating and has placed the Colorado River in the unprecedented situation of not only being oversubscribed but depleted to the point of reductions to the state of Arizona, Nevada and Mexico's river water allocation. California is not immune to allocation reductions. While none of these circumstances are of your board's making, there is little doubt of future impacts and resulting challenges to Region 9 water agencies and ratepayers.

Sierra Club views the 2021 Practical Vision as a critical and highly valued benchmark of future progress. The importance of societal equity and recognition of the crucial nature of Tribal culture and environmental and social justice challenges cannot be over emphasized in the Regional Board's oversight of water quality in Region 9. The Board's staff support is evident throughout the document, as is the dedication of Executive Officer Gibson's personal involvement in the Practical Vision.

Sierra Club considers the year's work to develop the Practical Vision document as a valuable regionwide strategic investment. A close reading reveals the foresight and details staff was enabled to consider and evaluate in this extensive approach to legacy problems previously considered intractable. Sierra Club San Diego urges your Board's adoption of the 2021 Practical Vision.

Sincerely,

Dr. Peter Andersen
Vice Chair Conservation Committee
Sierra Club San Diego

George Courser
Chair Conservation Committee
Sierra Club San Diego