



CLEAN WATER NOW

is an innovative, science-based organization committed to solution-oriented collaboration as a means of developing safe, sustainable water supplies and preserving healthy ecosystems.

To: David Gibson Executive Officer
San Diego Regional Water Quality Control Board Region 9 Cal/EPA

Attention: Ms. Jody Ebsen

Date: August 6, 2018

Transmitted electronically by email (SOCWA Submission Attached Separately)

Re: *2018 Triennial San Diego Basin Plan Draft Prioritized List
Review Comments CW845836*

From: Roger E. Bütow, Executive Director, Clean Water Now (CWN)

Ms. Ebsen:

CWN wishes to express its appreciation for the opportunity to provide comments regarding this matter.

We have reviewed the submissions provided to us by the South Orange County Wastewater Authority (SOCWA), San Juan Basin Authority (SJBA) and Santa Margarita Water District (SMWD). CWN enthusiastically supports all of their comments.

It is our understanding that Dr. Michael Welch continues to be engaged in this matter, and CWN cannot overemphasize how critical he was in our education as an NGO. We found his obvious expertise, ready correspondence accessibility, coupled with his input and guidance to be an invaluable resource as we attended the earlier series of Salt and Nutrient Management Plan (SNMP) meetings, as organized and chaired by SOCWA.

Relative novices regarding SNMP, with only some minimal understanding of the topic solely due to constant SJBA meeting attendance, he was a tremendous asset in our steep learning curve. We **thought** that we understood Basin Plan Objectives, but it became rapidly apparent that we needed more homework regarding the historical metrics, monitoring and attendant in-depth chemical analytic databases of the SOC watersheds.

The SOCWA comments regarding Project 4 (we assume heavily influenced by Dr. Welch's perspective) was especially notable to CWN as we have been the only local protectionist to consistently attend and track the document's main focus, i.e., the impacts regarding **Project 4: Climate Change Readiness/Sustainable Local Water Supply**.



(cont.)

An important section to CWN as excerpted from the SOCWA submission:

SOCWA Commitment to Project. SOCWA has committed to develop technical information required to support the proposed Basin Plan modifications within the San Juan Basin by:

- implementing an ongoing regional monitoring effort,
- initiating technical studies and antidegradation analyses which would support of the Basin Plan modifications, and
- initiating efforts to update the existing SNMP.

SOCWA acknowledges that Regional Water Board staff resources are limited. To this end, SOCWA is prepared to collaborate with other regional stakeholders such as the San Diego County Water Authority to ensure that the Regional Water Board secures adequate funding to engage the staff resources necessary to move forward within Project 4.

CAVEAT: CWN has some reservations about this portion, level of commitment and described collaboration: As a proviso, a specific stipulation if the Board agrees to, accepts, embraces and actively participates in the strategy outlined, CWN firmly requests that SOCWA members acknowledge and pursue the need to proactively include protectionist NGOs in the proposed follow-up, i.e., close collaborative interfacing with the SDCWA.

This should include being brought in for both technical and policy compliance discussions, true open transparency so that we may continue to perform and achieve our stated goals, objectives and respective mission statements in this matter.

In conclusion, we have separately attached the SOCWA submission which we concur with in PDF. If staff or Board members have any follow-up questions, please feel free to contact me personally using the information below.

Respectfully submitted,

Roger E. Bütow Founder & Executive Director

Clean Water Now

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