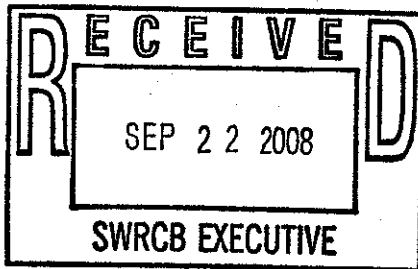


Public Comment
San Diego-Conditional Waiver
Deadline: 9/22/08 by 12 noon



3152 Shad Court
Simi Valley, CA 93063
September 22, 2008

State Water Resources Control Board
Ms. Jeanine Townsend, Clerk to the Board
1001 I Street
Sacramento, CA 95814

Re: "Comment Letter - San Diego - Revised Conditional
Waivers of Waste Discharge Requirements."

Dear Members of the Board:

I am opposed to the San Diego Water Board's October 10, 2007 Resolution No. R9-2007-0104, and ask that you not approve the amendment to the San Diego Region's Basin Plan that will not only renew the 26 existing conditional waivers for specific waste discharges, but incorporate 9 additional types of conditional waivers, and the waiver conditions were grouped(integrated).

Members of the Board, this action by the San Diego Water Board does impact wildlife, humans, and plant life. It is contrary to the anti-degradation policy. The San Diego Water Board approved Negative Declarations in its past amendments to the region's Basin Plan, and is doing so once again, even though Resolution Recital 19 states "Project level impacts will need to be considered in any subsequent environmental analysis performed by other entities implementing projects to comply with waiver conditions pursuant to Public Resources Code section 21159.2." Please note that this is on Page 4 of the 2007 Resolution--the document is not numbered!!!

Members of the Board, the real reason for the San Diego Water Board's recent Basin Plan amendment is to "...allow the San Diego Water Board to utilize fewer resources... Dischargers also benefit from fewer resource requirements when discharging in compliance with a conditional waiver." (Page 2, 2007 Resolution, Recital 8)

Members of the Board, the San Diego Water Board's 2007 Resolution does not list the 26 existing conditional

waivers renewed by Resolution No. R9-2002-0186 (Recital 9, Page 2).

Members of the Board, the San Diego Water Board's 2007 Resolution's Recital 10 just states "When the existing 26 waivers were originally adopted in either 1983, 1993, and/or 1995..." Since it is also stated that "Because the proposed conditions in this Basin Plan amendment for the 26 existing waivers do not differ significantly from the current waiver conditions, the CEQA does not require additional environmental analysis of these waivers in order to renew them with this Resolution" those 26 existing conditional waivers should have been named and listed with the respective year of adoption. (Page 2)

Members of the Board, the San Diego Water Board's 2007 Resolution's Recital 11 does not state "26". (Page 2)

Members of the Board, the 2007 Resolution's Recital 7 is no guarantee that compliance will be followed because the statement says "may be terminated at any time by the State Water Board or San Diego Water Board." (Page 2)

Members of the Board, the San Diego Water Board's 2007 amendment to the area's Basin Plan has impacted and impeded the South Coast(SC) Hydrologic Region's 2009 California Water Plan Update's Working Draft. Mr. Paul Dabbs, DWR's Statewide Planning Branch Chief, stated in his September 12, 2008 letter "...the specific process for preparation of the draft text for the South Coast regional report has evolved differently than the standard process used for the other eleven regional reports in Volume 3. Last June a group of southern California water interests (including Metropolitan Water District of Southern California, San Diego County Water Authority, and others) approached DWR and asked if they could take a lead role in preparing this regional report, with the intent of improving the focus on region-wide water issues and needs. DWR agreed to this proposal and provided the first initial draft for their use. However in the last few months, this regional effort has fallen behind schedule, and they do not expect to have any materials prepared for the South Coast regional report until the end of October. As a result we did not have a Working draft of the South Coast regional report available for review in August. DWR staff from our District office in Glendale are currently working to prepare a Pre-Admin draft using the same organizational structure as has been

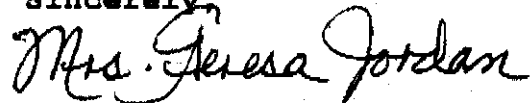
developed for all of the other regional reports. They are a little behind schedule, but a new Pre-Admin draft of the South Coast regional report will be ready for public review within the next week."

Members of the Board, the San Diego Water Board's 2007 amendment to the area's Basin Plan has impeded or impacted the release of public comments on the FloodSAFE California Program's Draft 2008 Strategic Plan.

Members of the Board, the San Diego Water Board's 2007 amendment to the area's Basin Plan may have a bearing on the DWR's 2008 Emergency and Regular Regulations for major flood management projects.

Members of the Board, the San Diego Water Board's 2007 amendment to the area's Basin Plan does not just cover U.S. territory, but also U.S./Mexico border related matters. It is hard enough to have dischargers comply in the States. Mexico does not have our environmental, and wastewater (NPDES and non-NPDES permits) discharge regulatory laws.

Sincerely,



Mrs. Teresa Jordan