



**SAN DIEGO
COASTKEEPER®**

May 27, 2014

Ms. Joann Lim
Executive Office
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

Re: U.S. Section of the International and Boundary Water Commission South Bay International Waste Water Treatment Plant Tentative Order No. R9-2014-0009 NPDES No. CA 0108928

Dear Ms. Lim

Please accept these comments on behalf of San Diego Coastkeeper and Surfrider Foundation San Diego County Chapter. Both organizations are dedicated to the protection and restoration of regional coastal waters and related environmental issues in the San Diego region.

We want to thank the Regional Board's staff for their efforts in developing and implementing a new permit that brings the International Boundary and Water Commission (IBWC), South Bay International Wastewater Treatment Plant (IWTP) into the present. After nearly 18 years of operating under the same permit, we appreciate that the IBWC NPDES permit will contain provisions that are more in line with other wastewater treatment plants.

With that said, the one area where this permit can further bring the NPDES permit into the present and give us a better understanding of the issues plaguing the Tijuana River, Estuary, and the coastal impacts of those issues, is through a more forward-thinking monitoring and assessment plan. San Diego Coastkeeper and Surfrider wish to hereby incorporate the comments of Falk Feddersen and Sarah Giddings and their staff at the Scripps Institute of Oceanography and UCSD regarding monitoring requirements of the Tentative Order. We strongly suggest the implementation of a real-time prediction model for the South San Diego ocean region including the Tijuana River Estuary and the coastline from Pt. Loma down to near Baja Malibu (Mexico), to help improve monitoring efforts, plan for future changes in outfall capacity, and respond to potential spills or other events. We would urge the Regional Board to delay finalizing the NPDES permit until August 2014, as was originally planned, to ensure that the most up-to-date technology in monitoring and assessments are included.

In light of the known challenges associated with receiving and treating influent from Mexico, which tends to vary greatly, and presents challenges for the IBWC plant, we believe the more information that can be gathered with improved monitoring, the better. This is especially true since the current plume

tracker has a limited ability to track changes in the near-shore environment. There are so many valuable resources in this area, and so many potential sources of pollution in the near-shore environment, we need to have as much data in real time as possible to provide notice to beach users, and to hopefully track and curtail the most problematic sources.

Finally, this permit should require back-up power at the two collector pump stations (Hollister and Goat Canyon) if is not already required. As these canyon collectors are the last opportunity to keep dry weather flows from fouling the TJ estuary, back-up power will help ensure that the precious habitat is protected should primary power systems fail.

Thank you for your time and consideration. Please feel free to reach out to us with any follow up questions.

Sincerely,



Matt O'Malley
Waterkeeper, Legal & Policy Director
San Diego Coastkeeper



Julia Chunn-Heer
Policy Manager
Surfrider San Diego County Chapter