



**GREG COX**  
SUPERVISOR, FIRST DISTRICT  
San Diego County Board of Supervisors

May 27, 2014

Mr. David Gibson  
Executive Officer  
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 Mr. ~~Gibson~~ *Dave*

As Supervisor for the First District of San Diego County, I would like to respectfully request the Board to delay the adoption of the tentative order scheduled for June 26, 2014 in order to consider inclusion of a real-time prediction model for the NPDES tentative order.

The new monitoring requirements for the United States International Boundary and Water Commission (IBWC) and South Bay International Wastewater Treatment Plant (IWTP) are an opportunity for the Board to update and modernize ocean monitoring as the current monitoring programs are out of date. The implementation of a real-time prediction model for the South San Diego ocean region would help to monitor activity, plan for future changes in outfall capacity and respond to potential spills or similar events. This model could be built using existing realistic parameters, including the oceanic boundary conditions from the larger scale Southern California Bight model run, river flow from the Tijuana River Estuary and San Diego River, South Bay ocean outfall, and even the Pt. Loma ocean outfall.

The South San Diego ocean region model would be able to predict locations at risk for potential spills, including spills from trans-boundary flows, flow exceeding the IWTP capacity, or effluent through the SBOO exceeding required standards. It would also differentiate sources of contamination and help to prevent further contamination, and mitigate contamination events. Ultimately, this model would help to ensure that water quality is comprehensively measured to maintain its protection and restoration.

I thank the Board for their consideration and urge a delayed adoption date for the NPDES permit renewal for the SBIWTP to allow for the inclusion of a real-time prediction model.

Sincerely,

  
GREG COX  
Supervisor, First District