



## City of Imperial Beach, California

OFFICE OF THE CITY MANAGER

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May 27, 2014

Joann Lim  
California Regional Water Quality Control Board, San Diego Region  
2375 Northside Drive, Suite 100  
San Diego California 92108

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

Dear Mrs. Lim:

The City of Imperial Beach appreciates this opportunity to provide comments on the Tentative Order No. R9-2014-0009. We recognize the effort made by RWQCB staff to consider and discuss the various stakeholder positions for this new permit and appreciate the consideration by the board to include the City of Imperial Beach in the process for updating the IBWC discharge permit. The provisions and limitations proposed in the Tentative Order provide an important and necessary update to the current discharge permit, which was adopted in 1996.

This Tentative Order includes many of the important elements the City discussed with Regional Board staff. The City strongly supports the implementation of a Spill Response Plan for Type A dry weather flows. We look forward to working with the IBWC and other stakeholders on the development of these Spill Response Plans. We also recognize the legal limitation by the Regional Board to require the implementation of a Spill Response Plan to address Type B dry weather flows. We wish the Regional Board could take additional steps to regulate cross boarder flows in the main channel of the Tijuana River; however, we also recognize that the current efforts to develop a new IBWC Treaty Minute may provide the necessary regulatory framework on the issue. We recommend that any IBWC Treaty Minute to address dry weather flows in the main channel of the Tijuana River get incorporated into future updates into this permit.

It is our understanding that once this Tentative Order is approved then the monitoring requirements set in this Order will be updated into the City of San Diego's NPDES Discharge Permit for the South Bay Ocean Outfall. In addition, these monitoring requirements will inform the future Permit renewal for the Point Loma Ocean Outfall. We strongly support the Regional Board's efforts to start integrating monitoring requirements across NPDES Permits.

An important component not included in the current proposed Tentative Order is the addition of a Special Study that will help inform future NPDES discharge permits through better modeling of the coastal conditions off of Imperial Beach. A higher resolution model that builds off the existing Southern California Coastal Ocean Observing System Tijuana River Plume Tracker is needed in order to integrate offshore currents, near shore currents, and water column mixing

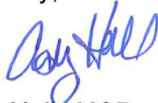
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into a near real-time hydrodynamic model. A tool of this nature such as the one presented by Scripps Institute of Oceanography could significantly enhance the monitoring programs for the South Bay and Point Loma Ocean Outfalls, and provide the modeling resolution necessary to effectively track other potential point sources such as discharges from the Tijuana River, San Antonio de los Buenos, and sewage spills originating in Mexico.

We strongly recommend the Regional Board to consider a special study for enhanced coastal modeling to be included in this current Tentative Order and future orders with the City of San Diego for the South Bay and Point Loma Ocean Outfalls. This type of model is strongly needed with the City of San Diego considering expanded use of the South Bay Ocean Outfall and the continued impact to Imperial Beach from trans boundary flows. We would encourage the delay in adoption of this order by a few months to allow the Regional Board the opportunity to research the details and benefits of an enhanced coastal model for the Imperial Beach shoreline.

Again, thank you for Including Imperial Beach in the process for updating the IBWC discharge permit. We look forward to continue working in collaboration with the Regional Board to further improve the receiving waters in the Tijuana River and along the Imperial Beach shoreline. Please contact Chris Helmer at (619) 628-1370 or [chelmer@imperialbeachca.gov](mailto:chelmer@imperialbeachca.gov) if you have any questions or comments.

Sincerely,



Andy Hall, AICP  
City Manager

cc: Greg Wade, Assistant City Manager / Community Development Director  
Hank Levien, Public Works Director  
Chris Helmer, Environmental Programs Manager