



November 30, 2023

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

Subject: Comment Letter – Tentative Time Schedule Order No. R9-2023-0189 on the U.S. Section of the International and Boundary Water Commission South Bay International Wastewater Treatment Plant Discharge Through the South Bay Ocean Outfall

Dear Mr. Rodriguez:

The San Diego Unified Port District (District) appreciates the opportunity to comment on the San Diego Regional Water Quality Control Board's (Regional Board) Tentative Time Schedule Order (Tentative Order) No. R9-2023-0189 for the South Bay International Boundary and Water Commission (IBWC) International Wastewater Treatment Plant (ITP). The Tentative Order serves as an escalated enforcement of the Cease-and-Desist Order previously issued by the Regional Board requiring USIBWC to comply with secondary effluent limitations, per Order No. R9-2021-0107.

As an environmental champion and the state-designated trustee for beach and submerged lands in Imperial Beach, the District is committed to continue working with its regional, state, and local partners to solve this public health and environmental crisis and to stop the discharge of sewage and trash to the Tijuana River Valley and Pacific Ocean. To that end, the District supports the Regional Board's efforts to correct and prevent further permit requirement violations at ITP by requiring the USIBWC to 1) submit a detailed time schedule of the specific actions they will implement to correct the facility's permit violations and 2) demonstrate completion of the specified actions. Compliance with Order No. R9-2023-0189 should be a priority to ensure ITP operations are, at minimum, functioning effectively to treat its current design capacity of 25 million gallons per day (mgd). The tasks and proposed interim goals identified in the Tentative Order appear to be reasonable for USIBWC to achieve timely compliance, especially since the goals were based on self-reported approximations by USIBWC in its quarterly Compliance Assurance Reports or through other written correspondence to the Regional Board. Once completed, the required tasks will not only aid to achieve compliance with Order No. R9-2021-0107, but will also facilitate expansion projects at the ITP as identified in EPA's Comprehensive Solution for addressing the current transboundary pollution crisis in the Tijuana River Valley watershed.

The District looks forward to continuing to work cooperatively with the Regional Board and the coalition of local stakeholders on this issue. If you have any comments or questions on the information above, please do not hesitate to contact me at (619) 686-6473 or via email at jgiffen@portofsandiego.org or Stephanie Bauer at (619) 400-4719 or via email at sbauer@portofsandiego.org.

Sincerely,

A handwritten signature in blue ink that reads "Jason H. Giffen".

Jason H. Giffen
Vice President, Planning & Environment