



JOEL ANDERSON

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Santee

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San Diego communities of:

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Del Cerro
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Kearny Mesa
MCAS Miramar
Miramar Ranch
Rancho Bernardo
Sabre Springs
San Carlos

San Pasqual Valley

Scrapps Ranch
Serra Mesa
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County communities of:

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Fembrook
Flinn Springs
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Harbison Canyon
Jacumba
Jamul
Johnstown
Julian
Lake Hodges
Lake Morena
Lakeside
Morena Village
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Pine Hills
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Tierra del Sol
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Serving the tribal governments

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Barona
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Capitan Grande
Ewiaapaayp
Inaja-Cosmit
Jamul Indian Village
La Posta
Manzanita

August 15, 2025

San Diego Regional Water Quality Control Board
2375 Northside Dr, Suite 100
San Diego, CA 92108-2700

San Diego Regional Water Quality Control Board Members,

I'm writing to express my support for your tentative Cease-and-Desist order regulating an additional 10 million gallons per day at the IBWC International Treatment Plant on the Tijuana River. Your leadership and proactiveness on this issue demonstrates our region's commitment to solving the decades-long Tijuana River sewage crisis and building better infrastructure.

If approved, this order will increase the total treatment volume at the IBWC International Treatment Plant from 25 million gallons to 35 million gallons. This increase will have a positive impact on our local community's health and protect San Diego County residents that have suffered from the challenges of this issue for years.

Beaches and businesses will reopen, U.S. Navy personnel will once again be able to train safely and consistently, and Border Patrol officers will be better able to maintain a secure border, all without dangerous, toxic exposure. This order is a critical step forward in permanently solving the Tijuana River sewage crisis and provides much needed relief to our communities affected by it.

Thank you in advance for considering my request. If you have any questions, or would like to discuss this matter further, please feel free to contact me at (619) 531-5522 at your convenience.

Sincerely,

Joel Anderson
Supervisor, Second District

SAN DIEGO COUNTY BOARD OF SUPERVISORS, SECOND DISTRICT
1600 PACIFIC HIGHWAY, ROOM 335, SAN DIEGO, CALIFORNIA 92101-2470
PHONE: (619) 531-5522 • EMAIL: JOEL.ANDERSON@SDCOUNTY.CA.GOV
www.supervisorjoelanderson.com



Supervisor Paloma Aguirre
San Diego County | District 1

Paloma Aguirre

Chair Pro Tem/District 1

San Diego County Board of Supervisors

August 19, 2025

San Diego Regional Water Quality Control Board

2375 Northside Dr, Suite 100

San Diego, CA 92108-2700

San Diego Regional Water Quality Control Board Members,

I am writing to strongly urge this Board's continued leadership in actively influencing, supporting, and prioritizing immediate solutions to solve the public health crisis caused by decades of sewage pollution in the Tijuana River Valley. I write in support of the proposed cease-and desist order authorizing the advance primary treatment of an additional 10 million gallons per day at the IBWC International Treatment Plant, increasing capacity from 25 million gallons to 35 million gallons per day. This action is urgently needed to reduce the flow of untreated sewage through the Tijuana River Valley, protect the health of San Diego County residents, and bring long-overdue relief to South Bay families who have endured exposure to toxic pollution for generations.

The San Diego Water Board's Practical Vision is guided by its mission to "preserve, enhance, and restore the quality of California's water resources for the protection of the **environment, public health**, and all beneficial uses." This mission is more than aspirational. It demands immediate action where public health and environmental protection intersect. The crisis in the Tijuana River Valley is exactly the type of generational challenge that this board is appointed to address, requiring urgent intervention to

safeguard our waters, restore community trust, and deliver the dignity of clean air and water to residents who have borne disproportionate impacts for decades.

Recent studies by the Centers for Disease Control and Prevention confirm what our constituents in my district have been reporting for years: dangerously high rates of illness tied directly to sewage exposure. Over 70% of residents surveyed in South County reported falling ill, a staggering statistic that underscores the severity of this ongoing emergency. Families, Navy personnel, and Border Patrol officers are all at risk from the toxic gases released when untreated sewage overwhelms our infrastructure. These reports are the daily realities for our communities, and they demand immediate intervention from elected and appointed officials who are tasked with the protection of public health and the environment.

Beyond expanding treatment capacity, immediate action must also begin at the Saturn Boulevard hotspot. I urge the Water Board to immediately work with the County of San Diego to expedite a major maintenance project at this location that will restore natural flow and reduce turbulence, which is a major factor contributing to the emission of hydrogen sulfide and other toxic gases that threaten our community's health and safety. Removing this obstruction is not only critical for water quality but also for reducing airborne hazards that endanger our children, seniors, and frontline workers. I encourage this Board to support the County in navigating and streamlining any regulatory requirements so that critical protections for community health can be delivered as quickly as possible.

Approving these measures will help reopen our beaches and businesses, protect our military readiness, and finally provide our communities with the dignity of clean air and water. For too long, our residents have borne the burden of this cross-border pollution. It is time to provide the comprehensive, structural fixes needed to protect public health and finally resolve this crisis.

Thank you for your leadership and attention to this urgent matter. I look forward to working with you to advance these solutions and ensure our residents are no longer treated as collateral damage in this decades-long environmental disaster.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paloma Aguirre'.

Paloma Aguirre

Chair Pro Tem/District 1

San Diego County Board of Supervisors



August 21, 2025

ATTN: Melissa Corona

California Regional Water Quality Control Board – San Diego Region

2375 Northside Drive, Suite 100

San Diego, California 92108-2700

Via email to SanDiego@waterboards.ca.gov

Re: Comment - Tentative Cease and Desist Order No. R9-2025-0139

Dear Chair Strawn and Board Members,

Please accept these comments on behalf of Coastal Environmental Rights Foundation (“CERF”) and San Diego Coastkeeper (“Coastkeeper”). Our organizations have been involved in the cross-border public health and environmental crisis at the border for years. The ongoing sewage discharges into the Tijuana River and Pacific Ocean demand immediate attention and long-term solutions. For these reasons, Coastkeeper and CERF appreciate and support USIBWC and the Regional Board’s swift action to enable the interim expanded treatment capacity of the South Bay International Wastewater Treatment Plant (“SBIWTP”). The Cease and Desist Order No. R9-2025-0139 (“Order”) will enable expanded plant capacity and establish interim measures to expedite construction and treatment.

Billions of gallons of contaminated water containing dangerous pathogens and industrial pollutants have flowed into U.S. waters, forcing near-continuous beach closures from the border through Imperial Beach and harming air and water quality for local communities on both sides of the border.

Removing 10 MGD of raw sewage from the Tijuana River, treating it to “Advanced Primary,” and discharging it three miles offshore will greatly reduce public health impacts for local communities and reduce or eliminate dry weather flows of raw sewage in the river. Years of continuous sewage flows have devastated the River and Estuary, with serious air quality and health impacts for those living and working in the region. According to USIBWC’s August 13, 2025 update, dry-weather flows have already dropped from 10–12 MGD earlier this summer to about 5 MGD, down from historical highs of 40 MGD. This expansion has the potential to completely eliminate dry-weather flows for the first time in years.

The U.S. EPA and USIBWC's commitment to the expansion within 100 days marks the fastest significant U.S. border-side infrastructure project in more than three decades to address transboundary pollution. CERF and Coastkeeper support those efforts and the critical role this Order will play to enable the project to proceed pending completion of further analysis and permit amendments.

CERF and Coastkeeper echo the Regional Board, UWIBWC, and U.S. EPA's calls for continued ongoing infrastructure improvements, coupled with the operation, maintenance, and funding to support them. While this project is a major step forward, its success depends on sustained efforts to properly operate and maintain the equipment. We support USIBWC and EPA's commitment to secure the necessary funding to ensure the expansion's success. Coastkeeper and CERF will continue to monitor the progress on the 100 day treatment expansion and other planned infrastructure improvements on behalf of the communities and coastal environment we serve.

We appreciate the opportunity to provide comments regarding the Order. Please contact us if you have any questions or need more information regarding our comments.

Respectfully,



Phillip Musegaas
Executive Director and Coastkeeper
San Diego Coastkeeper



Sara Ochoa
Programs Director
Coastal Environmental Rights Foundation



CITIZENS FOR COASTAL CONSERVANCY

August 21, 2025

To: San Diego Regional Water Quality Board
Attention: David W. Gibson, Executive Officer/Water Board of Directors
2375 Northside Drive, #100
San Diego, CA 92108
Hand Delivered/US Mail
Email to: SanDiego@waterboards.ca.gov

Subject: Public Comment and Correction of Background Facts
San Diego Regional Water Quality Board – August 27, 2025,
CEASE AND DESIST ORDER NO. R920250139
SOUTH BAY INTERNATIONAL WASTEWATER TREATMENT PLANT.
DISCHARGE TO THE PACIFIC OCEAN THROUGH THE SOUTH BAY OCEAN OUTFALL.

Honorable Board and Staff of the San Diego Water Quality Board

Citizens for Coastal Conservancy (C4CC) is a 501c.3 nonprofit located in Imperial Beach and represents the stakeholders in the communities of Imperial Beach, San Ysidro, Nestor, Chula Vista, National City and Coronado. We are the citizens who are most directly affected by the sewage crossing our border and being dumped into our river and ocean river environment. ***Our South Bay Community is opposed to the increase of 10 million gallons per day (mgd) of additional partially treated sewage being discharged to the South Bay Ocean Outfall (SBOO) as requested by the International Boundary and Water Commission. The basis of this opposition is large errors of understanding in the Background Information which the water board based its decision on the Cease-and-Desist order number R920250139. There are critical inaccurate understandings of the source of contamination which misrepresent and sequester the boards full understating of the impacts to our community. The Background Information does not accurately reflect all the known historical scientific data, current water testing data that show the direct threat to the public health if 10 million gallons of additional partially treated effluent will bring to our communities.***

We ask the Water Quality Board to consider, understand and have compassion that at current levels of discharge of 40 million gallons per day our citizens are experiencing the direct negative health effects of bad air quality, river and ocean water contamination, which the long-term health effects have yet to be fully realized. The exposure we are experiencing today may be cumulative and has already directly affected those with pre-existing respiratory conditions. The harmful exposures of contaminated water and air will not become apparent for 5 to 10 years from now. An example of this is the dozens of common residents including lifeguards and retired Seal Team members who are now having medical difficulties linked to working in the contaminated ocean water. We have additionally verified illness from the air quality in three separate instances involving a retired Navy Captain, a retired Navy SEAL, and a



CITIZENS FOR COASTAL CONSERVANCY

retired Navy enlisted member who since moving away from the Imperial Beach area have now fully recovered from the illness most likely caused by bad air quality.

We ask that the California regional water quality board revisit the background information and justify the water board findings for the cease-and-desist order number R920250139. Please consider requesting the IBWC reestablish its normal operational procedure to send the 10 million gallons of additional river sewage to the discharge point six miles south of the border to San Antonio De las Buenas. This has been the normal operation for the last 40 years.

Please postpone the increase of the 10 million discharge permit, until complete and robust vetting of all community voiced concerns backed by water test data is made for the cease-and-desist order. To not consider all the data is placing our community at risk by making a summary judgement without all the information you currently have at your disposal.

Please do the right thing.

Leon Benham, IBWC Citizens Forum Board Member 2023-2025

Executive Director

Citizens for Coastal Conservancy

923 Seacoast Drive, Imperial Beach, CA 91932

Phone 619-964-9153

"Our Community Our Choice"

From: [Steve Benson](#)
To: [sandiego](#)
Subject: NO to additional sewage
Date: Thursday, August 21, 2025 11:51:15 AM

Caution: External Email. Use caution when clicking links or opening attachments. When in doubt, contact DIT or use the Phish Alert Button.

We are the citizens who are most directly affected by the sewage crossing our border and being dumped into our river and ocean river environment.

Our South Bay Community is OPPOSED TO THE INCREASE OF 10 MILLION GALLONS OF ADDITIONAL partially treated sewage being discharged to the South Bay Ocean Outfall (SBOO) as requested by the International Boundary and Water Commission.


The basis of this opposition is large errors of understanding in the Background Information which the water board based its decision on the Cease-and-Desist order number R920250139. There are critical inaccurate understandings of the source of contamination which misrepresent and sequester the boards full understating of the impacts to our community. The Background Information does not accurately reflect all the known historical scientific data, current water testing data that show the direct threat to the public health if 10 million gallons of additional partially treated effluent will bring to our communities.

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We ask that the California regional water quality board revisit the background information and justify the water board findings for the cease-and-desist order number R920250139. Please consider requesting the IBWC reestablish its normal operational procedure to send the 10 million gallons of additional river sewage to the discharge point six miles south of the border to San Antonio De las Buenos. This has been the normal operation for the last 40 years.

Please postpone the increase of the 10 million discharge permit, until complete and robust vetting of all community voiced concerns backed by water test data is made for the cease-and-desist order. To not consider all the data is placing our community at risk by making a summary judgement without all the information you currently have at your disposal.

Thank you,
Steven Benson


Imperial Beach, CA 91932

“Our community our choice “

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