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## San Diego Regional Water Quality Control Board

March 2, 2017

Commissioner Edward Drusina  
International Boundary and Water Commission, U.S. Section  
4171 North Mesa, Suite C100  
El Paso, Texas 79902-1441

Commissioner Roberto Salmón  
Comisión Internacional de Límites y Aguas, Sección Mexicana  
Ave. Universidad # 2180  
Zona El Chamizal  
Cd. Juárez, Chihuahua  
CP 32310

**SUBJECT: NEED FOR IMPROVED SEWER SYSTEM RELIABILITY AND  
INTERAGENCY COMMUNICATION**

Dear Commissioners:

During the last several years, your leadership and our work together through organizations like the Tijuana River Valley Recovery Team and the Border 2020 program have led to promising improvements both in communication and process to implement environmental protection measures important to both our countries. Regrettably, the recent sewer system bypass into the Tijuana River, resulting in approximately 143 million gallons (541 million liters) of raw sewage flowing into the Tijuana River Valley and Estuary and affecting coastal water quality as far north as Coronado, has the serious potential to undermine our hard work and public confidence in the process you have initiated and led so well. I am deeply troubled by the lack of communication that has characterized this event and the extent to which present and potentially significant future failures may jeopardize our work together to serve and protect the human and environmental health of our communities.

I very respectfully request that we confer at your earliest convenience and, in particular, that you consider approaching the Border Environment Cooperation Commission and North American Development Bank as well as the state and local agencies in both countries to elevate the priority of improving sewer system reliability and interagency and binational communication. I am deeply concerned about the recent events and

discharges, and how they were handled by agencies in Mexico I know to be highly professional and committed to serving the public. Improvements in both communication and system performance would build on the investments already made in Tijuana. It is my opinion that improving wastewater management should be made a higher priority than the proposed NCS Agua/Comisión Estatal de Servicios Públicos de Tijuana (CESPT) desalination facility in Rosarito. In particular, I am very concerned that the capital costs and maintenance and operations expenses of such a costly facility, even in a public-private partnership, may burden CESPT with so much debt service obligations as to effectively limit or even preclude funding for sewer system improvements in coming years that will be all the more necessary if those systems are to receive still greater volumes of influent. Increased loading to what already appears to be a vulnerable sewage collection and treatment system without providing for their concomitant improvements would seem to portend more failures like those we recently saw in Tijuana. Such releases or spills directly threaten the health, lives, properties, and economies of communities in both Tijuana and San Diego and simply must be avoided.

In addition to public health and water quality, these sewage releases threaten public confidence and the perception of our agencies' shared efforts to craft a mutually beneficial partnership along the border. They also, however, present us with an opportunity to strengthen our ties and work together to make credible and durable improvements that prevent or minimize the impact of sewage spills in the future. Towards that end, I would like to ask that the appropriate government agencies, the Minute 320 Water Quality Work Group and the Binational Core Group consider the following measures:

- A detailed investigation of the breakdown in communications that resulted in an ongoing release of approximately 143 million gallons of sewage into the Tijuana River without any apparent attempt at diversion or public notification;
- The development of a binational public notification protocol for all sewage releases into storm water systems, the Tijuana River, or its tributaries. This would facilitate communication for public health agencies, landowners, and the press to provide timely information, enable a binational response to such events, and build public confidence in the efforts of agencies in both countries;
- A back-up IBWC pump station, located in San Ysidro, to complement the existing CILA pump station in Tijuana, that could, under special circumstances, divert emergency flows to the City of San Diego's Point Loma or South Bay wastewater treatment plants, or IBWC's wastewater treatment plant;

- Construction of a weir across the main channel of the Tijuana River to allow capture, retention, infiltration, or diversion of unexpected flows during the dry season to prevent or minimize impacts to the lower Tijuana River and Estuary and beaches in Tijuana, Imperial Beach, and Coronado; and
- An enhanced and binationally coordinated watershed and coastal waters monitoring program to develop information that would inform our efforts through Minute 320 to improve environmental quality in both countries.

I cannot emphasize enough how much I appreciate your efforts to surmount the often enormous efforts presented by wastewater, trash, and sediment issues along the border in Mexico and the United States. I strongly support the continued efforts to refine and advance the Minute 320 process as well as our working relationship to better manage the environmental issues and needs that concern our communities. Although the present circumstances may be an aberration or setback, we cannot work hard enough to prevent their recurrence if we are to serve and protect the well-being of the community members of Tijuana and San Diego, as they deserve.

Respectfully,



David W. Gibson  
Executive Officer