

COMMENT LETTER #18

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Assembly California Legislature



LORI SALDAÑA
ASSISTANT MAJORITY LEADER
ASSEMBLYMEMBER, SEVENTY-SIXTH DISTRICT
February 28, 2005

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Mr. Daniel Borunda
Environmental Protection Specialist
Compliance Section, USIBWC
4171 North Mesa Street, C-310
El Paso, TX 79902

RE: Draft Supplemental Environmental Impact Statement (DSEIS) for Clean Water Act Compliance at the South Bay International Wastewater Treatment Plant (SBIWTP).

Dear Mr. Borunda:

The office of California State Assemblymember Lori Saldaña has reviewed the written comments on the Draft Environmental Impact Statement (DSEIS) for Clean Water Act Compliance at the South Bay International Wastewater Treatment Plant submitted by the San Diego Chapter of the Sierra Club and the City of Imperial Beach.

We are in agreement with the concerns raised in their letters. In addition, we submit the following comments and attached documents regarding the DSEIS in terms of costs, industrial pretreatment, design function of ocean existing outfalls, and ongoing monitoring via the San Diego Coastal Ocean Observation System provided by Scripps Institution of Oceanography.

Materials have been attached that are copied from various studies, reviews and independent research findings prepared over the past 10+ years, and were not adequately addressed in previous impact statements or design decisions. They are included to provide a different perspective than what is presented in the current SEIS, with the request they be incorporated into the Final EIS development.

OVERVIEW: The IWTP is currently operating in constant violation of its NPDES discharge permit, and cannot comply with state or federal water quality laws without the construction of additional treatment facilities. Today, 25 million gallons of sewage are being discharged from the IWTP into the ocean. This discharge fails both acute and chronic toxicity standards for reasons that have yet to be identified, despite nearly a decade of efforts to establish an industrial pretreatment in Tijuana.

Even with these proposed facility improvements, it is unlikely the plant will be able to meet toxicity standards without an effective source control program developed in Tijuana. And without improvements to the ocean outfalls in San Diego and Tijuana, it is unlikely any improvement to the land facilities will fully protect ocean water quality at the discharge volumes described. The South Bay Ocean Outfall is simply too shallow (97

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