



Agenda Item: W21a  
Consistency Certification CC-056-09  
Metro Joint Powers Authority (JPA) San Diego  
**In Support**

October 1, 2009

California Coastal Commission  
Chairperson Neely  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

Attention: Mark Delaplaine

SUBJECT: Coastal Commission Meeting, Wednesday, October 7, 2009.

Item W21a. Consistency Certification CC-056-09 (City of San Diego)  
Re-submitted Consistency Certification by City of San Diego for secondary treatment waiver (i.e., Environmental Protection Agency (EPA) Reissuance under section 301(h) of the Clean Water Act, of a modified National Pollutant Discharge Elimination System (NPDES) Permit) for Point Loma Wastewater Treatment Plant Discharges offshore of San Diego, San Diego County. (MPD-SF)

Dear Commissioners:

The Metro Wastewater Commission and JPA (together "Metro JPA") would like to express their complete support for the reissuance of the 301 (h) modified NPDES permit for the City of San Diego's E. W. Blom Point Loma Wastewater Treatment Plant.

The Point Loma Wastewater Treatment Plant is a major component of the Metropolitan Sewerage System, which is operated by the City of San Diego, with the participation of fifteen other municipalities and agencies. Nearly one third of the total flow to the system originates from these participating agencies and, therefore, the Metro JPA, the coalition of municipalities and special districts sharing in the use of the City of San Diego's regional wastewater facilities, has an interest in decisions that affect the operation of the Metro system. Additionally, with coastal communities as participating agencies, we have a concern that the public health and environment of our local waters are protected.

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**The Joint Powers Authority Proactively Addressing Regional Wastewater Issues**

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Chula Vista • Coronado • Del Mar • Imperial Beach • La Mesa • Lemon Grove Sanitation District  
National City • Otay Water District • Poway • Padre Dam Municipal Water District  
County of San Diego, representing East Otay, Lakeside/Alpine, Spring Valley & Winter Gardens Sanitation Districts

Coastal Commission  
Point Loma Treatment Plant  
September 29, 2009  
Page Two (2)

The Metro JPA has been actively involved in all the secondary waiver processes at Point Loma, and the elected officials of the participating agencies are educated in this subject. We feel strongly that the combination of chemically assisted primary treatment, the deep ocean outfall (located 320 feet deep and 4.5 miles from the shoreline) and the City of San Diego's exemplary record of compliance with the State Ocean Plan during the last 15 years have proven to be protective of the public health and environment in the local area. As well, comprehensive ocean monitoring over the past 15 years, along with scientific analysis, has not revealed any harmful impacts to the ocean environment. The Metro JPA supports the U. S. Environmental Protection Agency's Approval Decision, as well as the San Diego Regional Water Quality Control Board's unanimous decision to approve the modified permit, because this decision continues to protect the environment while being fiscally prudent with public resources.

Therefore, the Metro JPA urges the California Coastal Commission to make the finding that San Diego's modified waiver complies with the California Coastal Management Program and that it will be conducted in a manner consistent with this program.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ernest Ewin', with a long, sweeping horizontal line extending to the right.

Ernest Ewin  
Chair Metro Wastewater JPA and Metro Commission