

CALIFORNIA COASTAL COMMISSION

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October 25, 2012

The Honorable Jerry Sanders, Mayor of City of San Diego
City Administration Building
202 C St., 11th Floor
San Diego, CA 92101

Members of City Council
City of San Diego
City Administration Building
202 C Street, MS #10A
San Diego, CA 92101

Re: City of San Diego, Secondary Treatment Waiver

Dear Mayor Jerry Sanders and Members of City Council:

On October 10, 2012, the City of San Diego (City) briefed the California Coastal Commission (Commission) on the status of its ongoing efforts to pursue wastewater reclamation and recycling. This briefing, which summarized the City's July 17, 2012, Recycled Water Study, was intended to satisfy the condition adopted by the Commission in its October 7, 2009, conditional concurrence with the City of San Diego's consistency certification for its most recent secondary treatment waiver for the Point Loma Wastewater Facility (Consistency Certification CC-056-09). Prior to the Commission's October 7, 2009, conditional concurrence, on August 13, 2009, the Commission had objected to the City's earlier consistency certification for this same secondary treatment waiver (CC-043-09).

In response to the City's briefing last week, the Commission expressed appreciation for the City's efforts taken and commitments made to date. However, the Commission also expressed significant concern that the City has not yet committed to milestones and implementation schedules that would enable the City to end the pursuit of future secondary treatment waivers. The Commission requested that I send you this letter to communicate its sense of the urgency on this matter.

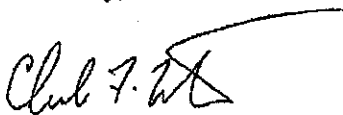
Because the City's current waiver will expire relatively soon (on July 31, 2015), the concern expressed was that it is incumbent on the City to immediately accelerate its planning and implementation efforts before this deadline occurs, and that short of that, the Commission would again consider objecting if the City pursues another waiver beyond this deadline. It was also observed that due to historically low current interest rates, the current economic climate is particularly conducive to the issuance of construction bonds to pay for the types of expanded wastewater and recycling facilities outlined in the City's Recycled Water Study.

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Finally, the Commission urged the City to commit to clearer and more expedited implementation measures, including specific, enforceable, and realistically implementable timetables and milestones to assure that the City's discharges will be brought into compliance with the secondary treatment requirements of the Clean Water Act, compliance that has now either been achieved, or is on a defined path to assure such achievement, by every other municipal sewage treatment facility in California, as well as by every other large city in the nation.

The Commission staff shares these important concerns, and on behalf of the Commission, we stand ready to assist the City in any necessary planning, coastal permitting, or federal consistency review needed to help expedite implementation. Please feel free to contact Mark Delaplaine, the Commission's Federal Consistency Manager, at (415) 904-5289, Jack Gregg, the Commission's Water Quality Manager, at (415) 904-5246, or Deborah Lee, the Commission's San Diego District Manager, at (619) 767-2370, if you have any questions regarding this matter.

Sincerely,



CHARLES F. LESTER
Executive Director

cc: Coastal Commission
CCC, San Diego District
Alexis Strauss, EPA, Region IX
David Gibson, Executive Officer, RWQCB, San Diego Region
Tom Howard, Executive Director, SWRCB
City of San Diego, Public Utilities Department
Honorable Jan Goldsmith, San Diego City Attorney
Honorable Bob Filner
Jay Goldstone, Chief Operating Officer, City of San Diego
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