THE CITY OF SAN DIEGO

December 17, 2015

Sent via Electronic Mail: R9RoseCanyon@epa.gov

U.S. Environmental Protection Agency, Region 9
ATTN: (WTR-2-3)
75 Hawthorne St.
San Francisco, CA 94105

Subject: Comments on Scoping for the Rose Canyon Fisheries, Inc. (RCF) proposed Sustainable Aquaculture Project

The City of San Diego, Public Utilities Department, is pleased to offer comments in response to the notice of Scoping for the Rose Canyon Sustainable Aquaculture Project. It is our understanding that these comments will be used to assist in the preparation of an Environmental Assessment (EA) to analyze the potential impacts related to the issuance of an NPDES permit for the project. In view of this, the City also understands that another comment period will be available once the draft EA is completed and published for public review. It is anticipated that more specific comments may be made at that time depending on how the EA addresses any issues brought up during the scoping process.

For purposes of the scoping process the following comments are submitted:

1. General Comments

   a. The City of San Diego operates the Point Loma Wastewater Treatment Plant that discharges 4.5 miles offshore of the Point Loma peninsula at a depth of 310 feet. This plant successfully operates with a modified National Pollutant Discharge Elimination System (NPDES) permit that obviates the need for secondary treatment. By constructing one of the longest and deepest outfalls in the world and implementing an extensive and robust ocean monitoring program, the City invested the resources necessary to qualify for a modified permit. Critical to the continuing approval of this modified permit is maintaining the soundness of the City's ocean monitoring program, an important aspect of which is the ability to discern outfall discharge effects from other local and regional impacts.

   b. Future water and wastewater planning strategies for San Diego, including the creation of 83 million gallons of potable water per day via wastewater reclamation, as well as the resulting reduction of flow to Point Loma, are made achievable by maintaining the Point Loma modified permit. Threats to the modified permit, including any loss of integrity to the ocean monitoring program, jeopardize these plans and also expose the City to a liability of nearly two billion dollars.

2. Specific Comments and Recommendations

   a. The proposed site for the Rose Canyon Fisheries (RCF) submersible cage structures is located within the NPDES permit mandated monitoring grid for the Point Loma Ocean Outfall (see **Figure 1**). Consequently, it will not be possible to continue the existing monitoring program and to achieve the objectives for which it has been designed if the aquaculture project is located as proposed. Construction and operation of the RCF project at the proposed site will impact field sampling efforts, as well as environmental assessment and reporting requirements for the City's long-term monitoring program for the Point Loma region, a program that began in the 1960s and which was expanded to the current discharge region in 1991. Additionally, if acceptable adjustments to the program were possible it could potentially result in an increase in costs to the City.

   b. The proposed site location will prevent sampling at some critical monitoring stations.

      i. The RCF cages will physically preclude sampling at station F23, which is an important site for monitoring water quality conditions and northward dispersion of the Point Loma Ocean Outfall (PLOO) wastewater plume.

      ii. The RCF cages will physically impede sampling within northernmost trawl zone SD14, which is an important reference area for assessing the health of the demersal fish community and other marine life.

      iii. The RCF cages will affect the station selection process for future "randomly selected" benthic stations that are monitored during the summer each year.

   c. RCF operations will negatively impact the ability to monitor wastewater dispersion from the PLOO.

      i. Expected inputs to the water column from the aquaculture project will make it impossible for the City to effectively monitor dispersion or any possible impacts of the wastewater plume in the northern third of the monitoring region. Thus, this will eliminate any further utility of these northern sites as reference stations.

      ii. Expected inputs to the seafloor from the aquaculture project will make it difficult or impossible for the City to effectively monitor potential wastewater effects on sediment quality or macrobenthic invertebrate community structure at benthic stations E26, B8, B9, B10, B11 and B12. Thus, this will eliminate the future utility of these sites as reference stations.

      iii. Expected inputs to the water column and seafloor from the aquaculture project will make it difficult or impossible for the City to effectively monitor potential wastewater effects on fish communities at trawl station SD14 and rig fishing station RF2. Thus, this will eliminate the future utility of these sites as reference stations.

d. If the RCF project is approved, it is recommended that the cage structures be relocated to at least 1 mile north of the PLOO monitoring grid (e.g., north of stations F25, B11 and F36 in Figure 1) in order to prevent disruption to the decades long monitoring program for the Pt Loma outfall region.

e. Since fish aquaculture projects such as that proposed are alleged to be sources of organic enrichment, nutrients and other contaminants, consideration must also be given to discerning potential impacts specific to the project. Thus, it is highly recommended that any NPDES permit for the project include a rigorous Monitoring & Reporting Program strong enough to distinguish between future project specific effects from other regional inputs.

f. Pre-discharge monitoring may also be necessary for the final site location in order to achieve a baseline for the area prior to implementation of the project.

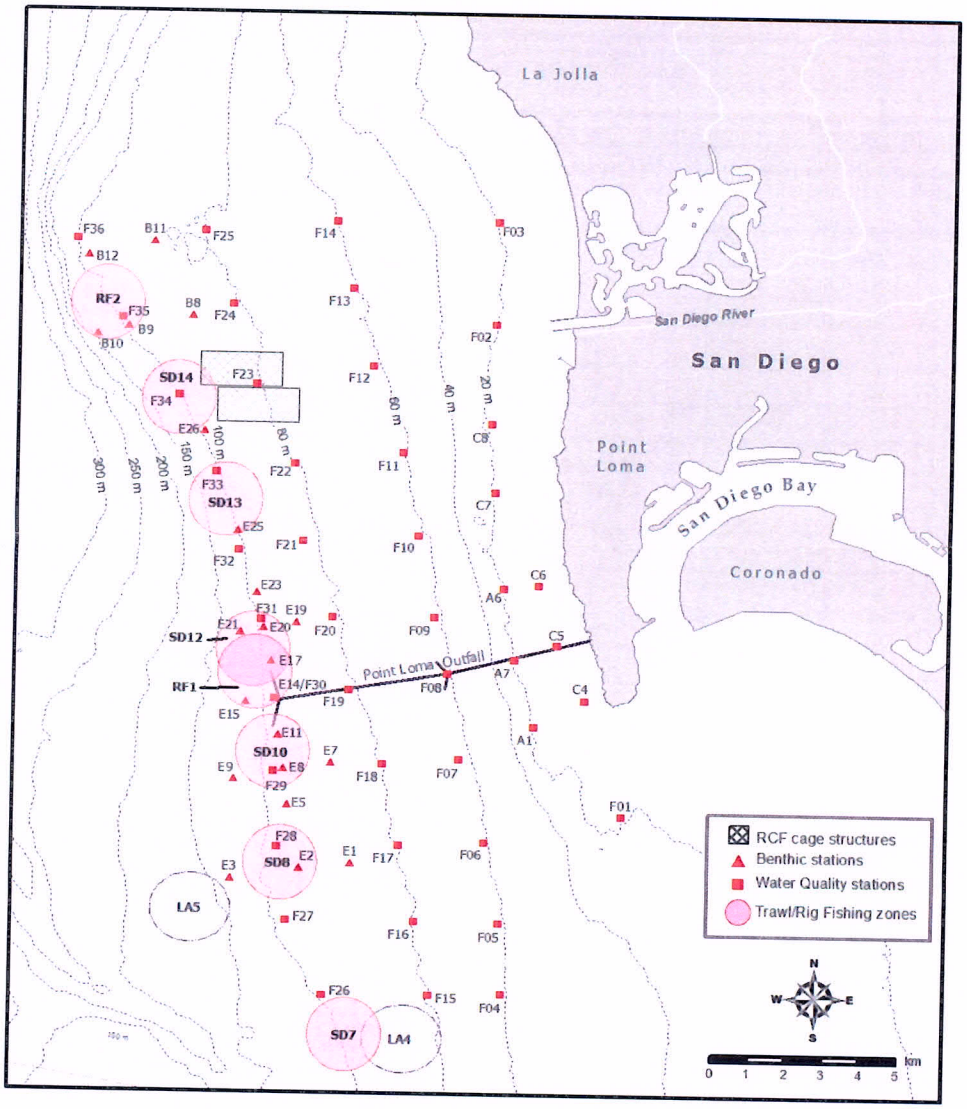

Figure 1
Map of proposed site for the Rose Canyon Fisheries (RCF) Sustainable Aquaculture Project submersible cage structures, along with NPDES-mandated receiving waters monitoring stations for the City of San Diego's Point Loma Ocean Outfall (Order No. R9-2009-0001, NPDES Permit No. CA0107409). Not shown are locations of 40 randomly selected benthic stations that are selected each year by EPA, and which extend from the US/Mexico border to Del Mar and offshore to about the 500 m depth contour.

Sincerely,

Halla Razak
Director of Public Utilities