



July 18, 2022

The Honorable Members of the
San Diego County Board of Supervisors
1600 Pacific Highway
San Diego, CA 92101

Dear Chair Fletcher and Members of the Board:

As Mayors of the Cities of Imperial Beach and Coronado, we have long championed for water quality along our south county shores, advocating for permanent solutions to cross-border pollution. We share the county's desire to protect the health, safety and access for our residents and the hundreds of thousands of annual visitors to our beaches. We agree that the underlying problem must be solved and are heartened by the \$300 million of federal projects currently under design and environmental review, and the \$300 million of projects in the pipeline.

We greatly appreciate the attention of the County of San Diego on beach water quality and the efforts that have been invested over the past decade to study testing. However, we submit that the switch to the new testing methodology and the July 1 policy pivot to the new "Warning" tier, require greater review and collaboration with coastal cities to balance the public's safety with coastal access.

The new ddPCR testing methodology and associated policies began May 5 and immediately resulted in an unprecedented number of beach closures, even though the existing culture and new ddPCR tests were asserted by the County to be calibrated for equivalency. Cities were told that water quality changes would be detected more quickly with the new test, resulting in a more rapid shoreline closures and re-openings. However, when implemented, a very different outcome occurred: our beaches immediately were ordered closed at historic high rates. The Imperial Beach shoreline was closed 81 percent of the month of May and the Coronado shoreline was closed 35 percent—from 0 percent for May in 2021 and 2020.

Since the implementation of the new test, the County conducted side-by-side testing of the culture and ddPCR tests. Readings for the culture test show water quality well within the safe limits. Under this state- and EPA-approved culture test, the beaches would not have been closed or under advisory a single day. Given the inundation of closures experienced, it is clear that the new ddPCR test has established a much lower testing threshold.

The most recent policy change, effective July 1, which established a new "Warning" tier is also concerning. This policy allows beaches to remain open even when bacteria levels exceed the County's new ddPCR standard, so long as a sewage impact has not been reported. The practical implication of the new water-quality testing methodology and associated policies is that beaches will be under "advisory" or "warning" even when water conditions are safe, and they will be open even when water conditions are, by the County's standards, unsafe.

We urge the County to return to the State-approved, culture-based testing, which is currently the standard across California upon which millions of beach visitors depend. This test is tried and true, and the public understands its operation and degrees of risk. In sum, it has been working.

We do not disagree that better testing will assist our understanding of water quality, but any changes must be properly calibrated and vetted to balance risk and public access. The new test and "Warning" tier are a significant departure from the standards of the rest of California and have placed too great of a burden on public access and risk to public health.

Sincerely,



Richard Bailey
Mayor
City of Coronado



Serge Dedina
Mayor
City of Imperial Beach