



April 28, 2020

Assistant Administrator, William Charles McIntosh
Environmental Protection Agency (EPA)
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Mr. Nicolas Chapa
Area Operations Manager
International Boundary and Water Commission (IBWC)
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Mr. Joseph Palmer
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County of San Diego - Department of Environmental Health
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Re: Request for Mitigation Steps re Tijuana River Valley Sewage and Covid-19 Precautions

Dear Assistant Administrator McIntosh, Mr. Chapa and Mr. Palmer,

We are in the midst of the Covid-19 pandemic which has resulted in thousands of deaths, nationwide stay-at-home orders and community concern as there are many unknowns with respect to the transmissibility of this coronavirus. This concern is especially felt by residents of Imperial Beach who have contacted Surfrider San Diego inquiring if the Covid-19 virus is transmissible via untreated human sewage and wastewater.

As you are aware, recent rains have heavily impacted South San Diego beaches due to untreated sewage run-off funneling into the Pacific Ocean. Even before the Covid-19 beach



closures, our southernmost beach had already been closed for 89 days by April 7, 2020 due to sewage contamination.

We are engaging with industry experts and are in support of studies that will guide government agencies in protecting the health and safety of residents. While research has [documented the presence of the virus](#) in the stool of infected individuals, it remains unclear if there is an enhanced risk of contracting COVID-19 from proximity to sewage-polluted waterways.

We are asking that you help prioritize and source studies to help fill information gaps and address key concerns, including:

1. Is the Covid-19 virus able to remain infectious after passing through the digestive system? If so, how infectious is the COVID-19 virus in fecal matter (e.g. are the counts high enough to be a high risk transmission route)?
2. Is the COVID-19 virus able to remain infectious in untreated or undertreated sewage and wastewater, containing substances such as feces, mucus, and saliva?
3. Can an infectious dose of the COVID-19 virus become air-borne from sewage-polluted waterways?
4. Can the COVID-19 virus remain infectious when in saltwater environments? If so, how long?
5. Given the frequent and persistent presence of raw and undertreated sewage in the Tijuana River Valley, are Imperial Beach and surrounding areas at higher risk of contracting the disease?

We respectfully request that you participate in finding the answers to these queries.

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