



## CITY OF CORONADO

April 3, 2026

The Honorable Jamieson Greer  
Director  
Office of the United States Trade Representative  
600 17th Street NW  
Washington, D.C. 20508

Re: Request for Amendments to the Agreement between the United States of America, the United Mexican States, and Canada (USMCA) to permanently address transboundary pollution and raw sewage flows

Dear Ambassador Greer:

I have the great privilege of serving as the Mayor of the City of Coronado, California. I am sending this letter to request your assistance addressing transboundary pollution and raw sewage flows that emanate from Tijuana, Mexico, and that have had a profound, negative impact on the economic and public health conditions in southern San Diego County.

Cross-border pollution has been a problem along the entire southern border of our country for decades. It is particularly acute in San Diego, where economic growth caused by NAFTA and the USMCA has allowed the City of Tijuana to grow unchecked, and without appropriate investment in basic sanitation or infrastructure. Transboundary sewage flows from Tijuana have caused a public health crisis in south San Diego County that is impacting our economy and could have far greater economic impacts if a permanent solution is not found.

Our federal government has appropriated more than \$700 million in funds to build infrastructure that will address the issue and obtained numerous commitments from Mexico to address conditions on its side of the border. We are extremely grateful for this investment and the efforts of the Trump Administration (especially EPA Administrator Zeldin and International Boundary Water Commissioner McIntosh) to fast-track solutions. However, without permanent controls related to trade, population and economic growth in Mexico will overwhelm the infrastructure that is now being constructed and repeat the problem we are facing today.

This is an issue that has implications for national security, public health and economic development in San Diego. We need your help in amending the USMCA to include structural controls that will hold Mexico accountable for the impacts of economic growth that it is imposing on communities in the United States.

## **UNITED STATES NAVY**

The City of Coronado is located on a peninsula in San Diego Bay, seven miles from the international border with Mexico. The City is proud to be home to Naval Base Coronado, one of the largest naval institutions in the United States.

Naval Base Coronado hosts three aircraft carriers, the United States Naval Special Warfare Command, the U.S. Navy SEAL Basic Underwater Demolition/SEAL (BUD/S) program, North Island Naval Air Station, and the Command, Naval Air Forces. Every Navy Seal in the United States military spent time in Coronado and in the adjacent waters of the Pacific Ocean.

Transboundary sewage flows have had a documented impact on force readiness and training opportunities for the Navy. In October 2024, the Inspector General of the Department of Defense (OIG) issued a report documenting concerns about the impacts of transboundary sewage on training for the Navy SEAL BUD/S program. In February, 2025 the OIG went one step further and issued a Management Advisory. The Advisory further documents water quality conditions and closures related to transboundary sewage. It also directs trainers to develop a policy for monitoring water quality and to relocate, reschedule, or cancel water training when bacteria levels exceed state health standards.<sup>1</sup>

I have spoken to many members of the Navy and their families. They are part of our community. All are concerned about the water quality conditions, the health of our valued sailors and what it means for force readiness. The OIG reports make clear that transboundary sewage flows have an impact on our national security interests and need addressing.

## **HOSPITALITY AND TOURISM**

The City of Coronado is also home to a thriving tourism industry anchored by multiple hotels and restaurants, including the Hotel del Coronado and the Loews Coronado Bay Resort. Hotel stays alone generate \$190 million in revenue annually, which supports more than 900 jobs and \$60 million in employee wages.<sup>2</sup>

Regionally, San Diego ranks fourth nationally in terms of hotel occupancy rates and revenue per room, behind New York, Oahu and Miami and is first on the West Coast.<sup>3</sup>

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<sup>1</sup> Copies of the report and Management Advisory are attached.

<sup>2</sup> See Tourism Economics, Economic Impact of Discover Coronado (2024) pp. 4-5, 10. Available at <https://discovercoronado.com/wp-content/uploads/EconomicImpact2023-copy.pdf>

<sup>3</sup> San Diego Tourism Marketing District, FY25 Performance Report (Jan. 2026) p. 6. Available at [https://sdtmd.org/wp-content/uploads/2025/12/SDTMD\\_AnnualReport\\_FY2025\\_Final.pdf](https://sdtmd.org/wp-content/uploads/2025/12/SDTMD_AnnualReport_FY2025_Final.pdf)

Hotel stays generate \$3.8 billion annually and \$325 million in transient occupancy tax (TOT) collections for the City of San Diego.<sup>4</sup> More than 32 million people visit San Diego annually, putting more than \$14 billion into the local economy.<sup>5</sup> One in eight jobs in San Diego is tied to tourism.<sup>6</sup>

People come to the San Diego region, and to Coronado in particular, to go to the beach, to be by the beach and to go in the ocean. Without access to those resources, the regional tourism economy is at risk.

## **ECONOMIC GROWTH IN TIJUANA, MEXICO**

Tijuana, Mexico is located immediately across the United States/Mexico border from San Diego and the City of Imperial Beach. Coronado is just a few miles north. Like much of Mexico, as Tijuana has grown, the public sanitation infrastructure has not kept up. Sewage, industrial waste and trash flows from Tijuana to the border zone have been a problem for decades.

Beginning in the 1990s, population and economic growth in Tijuana started growing exponentially. Growth coincided with NAFTA and the massive increase in trade and cross-border development induced by the treaty. This growth has continued under the revised USMC:

- Between 2006 and 2024, exports from Tijuana grew from \$12 billion annually, to more than \$40 billion annually.<sup>7</sup>
- Between 2020 and 2024, the relevant period for the USMCA, exports grew from \$28 billion to \$40 billion.<sup>8</sup>
- Between 1994, the year NAFTA was signed, and 2024, population surged by almost 1.3 million people.<sup>9</sup>

The San Diego region is one of the most active border-crossing regions in the world. More than 120,000 people and 2,900 commercial vehicles cross northbound daily.<sup>10</sup> This flow of commerce sustains supply chains essential to manufacturing, agriculture, and retail

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<sup>4</sup> Id.

<sup>5</sup> Id., at 7.

<sup>6</sup> Id.

<sup>7</sup> Gobierno de Mexico, Data Mexico, About Tijuana, Foreign Trade, available at <https://www.economia.gob.mx/datamexico/en/profile/geo/tijuana?timeNetTradeSelector=Year>

<sup>8</sup> Id.

<sup>9</sup> See <https://populationstat.com/mexico/tijuana>

<sup>10</sup> San Diego Association of Governments, Otay Mesa East, the Business Case for an Innovative New Port of Entry (Nov 2025). Available at <https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/featured-projects/sr-11-otay-mesa-east-port-of-entry/otay-mesa-east-business-case-brochure.pdf>

across North America.<sup>11</sup> Because of NAFTA and the USMCA, Mexico and the United States are each other's number one trading partner – Mexico accounts for 16% of U.S. trade with the world (imports and exports, measured value).<sup>12</sup> U.S. businesses have built supply chains, and more recently vertically integrating operations, in Tijuana because of these economic ties.<sup>13</sup>

The economic growth and prosperity generated by NAFTA and the USMCA are clear. Unfortunately, Mexico has not kept up with the basic infrastructure and sanitation demands that were necessary to manage the population growth that came with it.

## **IMPACTS OF SEWAGE ON OUR COMMUNITY**

Lack of infrastructure and failure to maintain existing collection and treatment systems has resulted in millions of gallons of raw sewage and industrial waste flowing north into the cities of San Diego, Imperial Beach and Coronado. This is a public health crisis that has had wide ranging impacts, including:

- Causing illness among members of the armed forces training in the waters offshore of Coronado, and impacted training schedules for special operations forces<sup>14</sup>
- Exposing Border Patrol agents in the Tijuana River Valley to hazardous substances and waste, causing illness and injury to those agents<sup>15</sup>
- Causing noxious fumes to enter homes and schools in communities near the international border<sup>16</sup>

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<sup>11</sup> See General Services Administration, San Ysidro Land Port of Entry Fact Sheet (Dec. 2019). Available at <https://www.gsa.gov/system/files/Overarching%20San%20Ysidro%20Fact%20Sheet%20-%20Dec%202011%202019.pdf>

<sup>12</sup> San Diego Association of Governments, Otay Mesa East, the Business Case for an Innovative New Port of Entry (Nov 2025). Available at <https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/featured-projects/sr-11-otay-mesa-east-port-of-entry/otay-mesa-east-business-case-brochure.pdf>

<sup>13</sup> Id.

<sup>14</sup> See footnote 1.

<sup>15</sup> Stigler et al., New report: Public health crisis unfolds as Tijuana River sewage contamination escalates, San Diego State University School of Public Health (Feb 13, 2024) p. 1, 6. Available at <https://www.sdsu.edu/files/tijuana-sewage-contamination-public-health-crisis-white-paper-021424.pdf>; 10 News San Diego, Toxic Tijuana River threatens health of Navy SEALs, Border Patrol agents in San Diego (Apr 16, 2025) Available at <https://www.10news.com/news/local-news/south-bay-news/toxic-tijuana-river-threatens-health-of-navy-seals-border-patrol-agents-in-san-diego>

<sup>16</sup> Rico et al., Heavily polluted Tijuana River drives regional air quality crisis, Science Vol 389, Issue 6763 (Aug 28, 2025). Available at <https://www.science.org/doi/10.1126/science.adv1343>

- Causing illness in recreational ocean users in Imperial Beach and Coronado<sup>17</sup>
- Causing major damage to the tourism industry in Imperial Beach and threatening similar harm to the City of Coronado<sup>18</sup>

## **FEDERAL EFFORTS TO DATE**

The news is not all bad, in his first term, President Trump was instrumental in allocating funds for infrastructure improvements in the United States that would alleviate the sewage crisis. Since taking office the Trump administration has acted swiftly to start construction and obtain commitments from Mexico on future management and improvement.

USTR was likewise instrumental in helping obtain resources. Much of the progress we have seen to date is the direct result of the USMCA Section 281, which required the EPA to construct projects in the U.S. to address cross border pollution, and which allocated \$300 million towards these projects. Notably, USTR also negotiated improved environmental controls into the USMCA that provide greater protection for both the environment and our economy.

\$300 million was not enough to address the crisis, current estimates are closer to \$1 billion. Congress has appropriated \$400 million in additional funds to make this possible – Speaker Johnson, Representatives Peters, Vargas, Crenshaw, Van Orden, Zinke, Crane and Luttrell; and Senators Schumer, Padilla and Schiff were all extremely helpful. This has truly been a bipartisan effort with full support from Congress.

Despite these efforts and the progress that the Trump Administration has made in constructing infrastructure and obtaining commitments from Mexico, beach closures continue. In 2025, Coronado's beaches were closed or under advisory more than 50% of the time.<sup>19</sup> Imperial Beach was closed for almost the entire year.

## **REQUEST FOR STRUCTURAL CONTROLS IN THE USMCA**

There is an immediate need for enforceable standards to ensure that Mexico continues to live up to its obligations and commitments.

There can be no question that trade facilitated and authorized by the USMCA has created growth in Tijuana. Mexico's failure to both adequately plan for growth, and to live up to

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<sup>17</sup> Deborah Brennan, How sewage pollution in a California beach town is affecting kids' health: Headaches, rashes and more, CalMatters (Mar 26, 2026). Available at <https://calmatters.org/environment/2026/03/tijuana-river-imperial-beach-schools/>

<sup>18</sup> Feds visit Imperial Beach to assess economic toll of Tijuana River pollution crisis, San Diego Union Tribune (Apr 1, 2026). Available at <https://www.sandiegouniontribune.com/2026/03/31/feds-visit-imperial-beach-to-assess-economic-toll-of-tijuana-river-pollution-crisis/>

<sup>19</sup> See attached report from Coronado Lifeguard Service. Additional data on closures is available at the County of San Diego's Beach and Bay Water Quality Program website: <https://www.sdbeachinfo.com/>; and at the State of California Water Quality Council, Water Quality Dashboard website: [https://tableau.waterboards.ca.gov/t/WaterboardsPublic/views/BeachPostingsandClosuresEXTSERVERD/ATA\\_17654067982670/Dashboard3](https://tableau.waterboards.ca.gov/t/WaterboardsPublic/views/BeachPostingsandClosuresEXTSERVERD/ATA_17654067982670/Dashboard3)

other treaty obligations – namely those in the Treaty on the Waters of the Colorado and Tijuana Rivers and of the Rio Grande – has resulted in a public health crisis in the United States.

The City of Coronado urges USTR to incorporate structural controls into the USMCA to address these failures. Past iterations of the USMCA and NAFTA relied on incentives such as grant funding and loans to encourage Mexico to construct and maintain infrastructure in the border zone. This is not enough. There must be enforceable commitments in the USMCA to ensure that the interests of the United States and its residents are protected.

On March 6, 2026, we met with your office of Intergovernmental Affairs to discuss these concerns. The meeting concluded with the City committing to providing the information that has been included in this letter. I want to note that I found the meeting to be very helpful and informative. The City has since reviewed the USMCA and the dispute resolution provisions in Article 31. I am hereby requesting that Article 31.2 be amended to incorporate compliance with agreed to obligations of the United States and Mexico pertaining to sanitation and control of sewage in the San Diego and Tijuana Region, and addition of a Rapid Response Mechanism similar to Annex 31-A to likewise address agreed to obligations of the parties pertaining to sanitation and sewage in the Region.

On behalf of the City, I would like to continue discussions on potential remedies in the USMCA. I urge USTR to consult with EPA, the International Boundary Water Commission, NADBANK and members of Congress from the border region to determine which controls make the most sense.

The environmental crisis facing the San Diego region is directly related to the economic impacts of the USMCA. It was known at the time of the original USMCA that Mexican transboundary sewage was a problem and funding to partially address the issue was included in the 2020 amendments. Unfortunately, this was not sufficient to address the problem, which has only increased due to the success of the treaty and the massive increase in trade between the United States and Mexico. The City strongly supports renewal of the USMCA and free trade in general. However, there must be enforceable mechanisms for compliance that protect communities like Coronado.

Sincerely,



John Duncan  
Mayor  
City of Coronado

cc: Coronado City Council