



**SIERRA CLUB**  
LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES



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CLUB**  
**BAY ALIVE**

July 20, 2022

Alyx Karpowicz  
San Francisco Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612  
Via email to [Alyx.Karpowicz@waterboards.ca.gov](mailto:Alyx.Karpowicz@waterboards.ca.gov)

Re: Comment Letter – Flood Protection WDR Amendment

Dear Ms. Karpowicz,

We appreciate the opportunity to submit public comments regarding the San Francisco Bay Regional Water Quality Control Board's Tentative Order (Order) for Amending Waste Discharge Requirements (WDR) Orders for 16 Bayfront Landfills.

The Sierra Club Loma Prieta Chapter (San Mateo, Santa Clara and San Benito Counties) has a long and deep interest in the San Francisco Bay and its ecosystems as well as areas near the Bay where development may impact natural resources and climate resilience in the region. We represent more than 100,000 members and supporters in the three-county region. In partnership with our sister Chapters around the Bay, we have launched **Bay Alive**, a Bay-wide campaign to protect and enhance San Francisco Bay wildlife, habitat, and ecosystems, and to advance community and regional resilience to sea level rise (SLR). Our Bay Alive Campaign also works closely with the San Francisco Shoreline Contamination Cleanup Coalition to engage and educate frontline communities regarding heightened contamination threats related to sea level rise and to amplify community voices speaking up for solutions.


We applaud the Water Board for recognizing the serious contamination threats posed by sea level rise impacts on shoreline landfills. This action to expand the number of landfills subject to Long-term Flood Protection requirements, (including vulnerability assessment, regular reporting updates, and planning for both SLR and groundwater rise impacts) is a step in the right direction. While we generally support the Order, we urge you to provide greater clarity about the Board's overall approach regarding all Bayfront and low-elevation landfills. In particular, we request that the order be amended as follows:

1. Identify the complete list of Bayfront and other low-elevation landfills recognized by the Water Board as “vulnerable to climate change and SLR.”
2. Describe the process and criteria by which the Water Board determined which Bayfront and other low-elevation landfills are “vulnerable to climate change and SLR.”
3. Identify the seventeen shoreline landfills that are already subject to the Long-term Flood Protection Plan requirements.
4. Describe the process and criteria by which the Water Board will determine, going forward, whether the Long-term Flood Protection Plan requirements should be expanded and/or extended to any additional Bayfront and other low-elevation landfills.

In addition, we support the comments and recommendations submitted by the San Francisco Shoreline Contamination Cleanup Coalition (attached) and encourage you to favorably consider their recommendations related to strengthening not only the Order, but also the Flood Protection Plan requirements applied to all landfills deemed vulnerable to climate change and SLR. We agree that additions to the RWQCB Region 2 website could help facilitate improved community understanding, involvement, and participation in the Water Board’s regulatory program for landfills. Given the disproportionate risk of toxic contamination in frontline communities around the Bay, every effort should be made to ensure that accurate, accessible information about vulnerable sites, anticipated risks and the Water Board’s response strategy are available to the public.

Thank you for your consideration of these comments.

Sincerely,



Jennifer Chang Hetterly  
Bay Alive Coordinator



Arthur Feinstein  
Chair, 3-Chapter Sea Level Rise Committee  
Bay Alive Campaign