

October 20, 2022

D R A F T

TO: Thomas Mumley, State of California Regional Water Quality Control Board
San Francisco Bay Region

FROM: Brisbane, CA City Council

We are writing regarding your update of waste discharge requirements for Bayfront landfills. Two such landfills, Brisbane R2-2001-0041 (Baylands), and Brisbane R2-1996-058 amended R2-2015-0006 (Sierra Point) were included in this update. While we are glad to see that the scope of regulatory updates is gradually expanding to include previously neglected landfill sites around the bay, we think that the updating process as currently conceived is inadequate to address the hazards to Brisbane presented by shoreline waste sites within our city limits as the climate changes.

The projected impacts of climate change on these sites seem to us to require a community-inclusive planning process involving the city's citizen advisory committees that would be charged with producing a comprehensive waste discharge plan covering the entire waterfront. It would include all discharge sites, such as Consolidated Chemical (VWR) and Unocal, which are not included in the present updates, and would be based on a thorough understanding of seasonal wetland, tidal and stormwater movement, and would be guided by academic experts and subject to peer review. Unfortunately, the piecemeal updates that are underway overlie existing piecemeal remediation plans whose potential consequences for the buried wastes and for neighboring properties have received little or no consideration, and are being done without adequate research on wet-season water movements. The comprehensive process that we believe is necessary would take more time than updates, but it would in our opinion be a much better way to assure the safety both of our city and the bay itself.

Thank you for your consideration.