

SAN FRANCISCO BAY AREA ACTION ALERT

October 27, 2023

Tell the California DTSC to Protect Our Communities from Toxic Waste & Sea Level and Groundwater Rise!

Public Comments must be submitted BY OCTOBER 31, 2023.

The California Department of Toxic Substances Control (DTSC) is currently developing guidelines for toxic contaminated sites cleanup in response to the dangerous threats that sea level rise poses. Many communities along the California shoreline and waterways — especially the San Francisco Bay area — are already feeling the negative effects of sea level and groundwater rise. The threat of these climate-related changes is even greater in areas where toxic waste is stored or contaminated sites have yet to be cleaned up.

The draft guidance is an **important start**, but it is not enough. It fails to account for the substantial risks that related groundwater rise and lacks a lot of necessary detail to actually protect shoreline and waterway communities.

Some of the Key Points:

DTSC's guidance needs to...

- Use best available science — call for resilience against a greater degree of SLR
 - Demand that sites prepare for greater than 6ft of rise, and extend to further inland sites as well to prepare for the worst case scenario
- Account for groundwater rise at all sites SLR is assessed
- Develop a clear plan for enforcement
- Incorporate stronger measures for public engagement and transparency
- Recognize that capping and sea walls are inadequate cleanup/mitigation solutions due to the threats of groundwater rise, sea level rise, and other types of flooding
- Call for more accountability and specificity in the re-evaluation of existing remedy plans at cleanup sites — DTSC must reevaluate and change the current “remedies” at sites vulnerable to SLR and GWR

Ways to submit your comment

- Send a letter via email using our template (below)
- Submit comments via their online survey:
 - <https://survey123.arcgis.com/share/c810331aaeff4ebca436f5166d85b7ec>
 - This link can also be found on the DTSC SLR page on their website

Sample Comment

Dear DTSC Representatives,

My name is [your name here] and I am writing to comment on the Department of Toxic Substances Control's draft Sea Level Rise Guidance for Project Managers. [Explain why this matters to you, i.e. you live near a specific contaminated site, you worry about the health and safety of the SF Bay, you are concerned about SLR, etc] While the Guidance represents a strong and important start towards protecting California from the consequences of sea level rise, further measures need to be taken. In particular, I urge you to implement this Guidance immediately and adapt the guidance to follow through on its professed commitment to using best available science. I urge DTSC to prepare for more than 6 feet of sea level rise and ensure we are prepared for the worst case scenarios. Additionally, groundwater rise also poses a significant threat to contaminated sites along our coast and Bays: as such, the guidance must include stronger, more explicit instructions on how to protect contaminated areas from groundwater rise. For the good of our communities, DTSC's Sea Level Rise Guidance for Project Managers needs to include stronger plans for enforcement, public engagement, accountability, and truly protective cleanup remediation plans. [Add in any other comments, questions or concerns you may have]

For the health of communities and environmental justice,

[Your name]