California Regional Water Quality Control Board San Francisco Bay Region

STAFF-INITIATED CHANGES

On the Tentative Order Amending

Waste Discharge Requirements for Long-Term Flood Protection Requirements at Oceanfront and Bayfront Municipal Solid Waste Landfills and Industrial Facilities

This document reflects staff-initiated changes. Revisions to the Tentative Order are shown with strikethrough text for deletions and <u>underlined</u> text for additions.

Change 1

We revised the first paragraph of Finding 2 as follows:

Since 2009, as part of the routine update of Waste Discharge Requirements (WDRs), the Regional Water Board has included a requirement for preparation, submittal, and five-year updates of a Long-Term Flood Protection Report or Plan for Bayfront and other low-elevation facilities recognized as vulnerable to climate change and sea level rise. This Amendment applies to 15 Bayfront landfills and 6 industrial facilities that have already been required to submit at least one Long-Term Flood Protection Report or Plan. These are listed in Table 1 and shown in <u>Figure 1</u>. This Amendment also applies to 4 oceanfront and Bayfront landfills and 2 industrial facilities that have not been required to submit Long-Term Flood Protection Reports or Plans in the past. These facilities are listed in Table 2 and shown in Figure 2. All facilities affected by this Order are shown in Figure 1.

Change 2

We revised Finding 6.a as follows:

The 2018 State of California Sea Level Rise Guidance (Sea-Level Rise Guidance), developed by OPC, provides a decision framework for state agencies and local governments to factor climate change and associated impacts into planning decisions. The Sea-Level Rise Guidance summarizes the best available science on sea level rise and encourages agencies to select a sea level rise projection for planning purposes based on multiple factors, such as the location of a facility, its expected lifespan, sea level rise exposure and associated impacts, adaptive capacity, and risk tolerance/aversion. The Sea-Level Rise Guidance is expected to be revised every five years, with the next update scheduled for consideration by OPC's Board for approval in February June 2024. Although the Sea-Level Rise Guidance targets state and local entities, the framework can be a useful planning tool for private entities as well.

Change 3

We replaced Figure 1 with Figures 1 and 2 to show the locations of the landfills and industrial facilities numbered as they appear in Tables 1 and 2. We revised the Attachments list accordingly as follows:

Attachment<u>s</u>: Figure 1₋ - Site Location Map Location of landfills and industrial facilities listed in Table 1 Figure 2 - Location of landfills and industrial facilities listed in Table 2

Change 4

We made non-substantive editorial and formatting changes.