



## San Francisco Bay Regional Water Quality Control Board

September 27, 2022

Supervisors Preston, Chan, Mandelman and Walton  
San Francisco Board of Supervisors'  
Government Audit and Oversight Committee  
City Hall 1  
Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102-4689

Via electronic submittal to: [alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org); [stephanie.cabrera@sfgov.org](mailto:stephanie.cabrera@sfgov.org)

SUBJECT: Hearing - Civil Grand Jury Report- "Buried Problems and a Buried Process- The Hunters Point Naval Shipyard in a Time of Climate Change"  
San Francisco Board of Supervisors' Government Audit and Oversight Committee Meeting, September 29, 2022

Dear Supervisors Preston, Chan, Mandelman, and Walton,

Thank you for the opportunity to discuss the Civil Grand Jury Report, "Buried Problems and a Buried Process- The Hunters Point Naval Shipyard in a Time of Climate Change" discussed on September 15 and again on September 29. Unfortunately, lead staff from the San Francisco Bay Regional Water Quality Control Board (SF Bay Water Board) are not available to participate (we are committed to a previously scheduled racial equity and environmental justice training). In lieu of attending the hearing, we are sharing the following information about our mission, authority and attention to cleanup actions, climate change, and environmental justice.

The SF Bay Water Board has responsibility and authority to protect water quality for people and the environment throughout the San Francisco Bay including Hunters Point. This responsibility includes many sources of pollution and habitat impacts, including the contamination from operations at the Hunters Point Naval Shipyard. We are a regional agency (with regions defined by watersheds) of the State Water Resources Control Board, which is part of the California Environmental Protection Agency. Our mission is *to preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations.*

Hunters Point Naval Shipyard is one of our highest priorities for cleanup due to the extent and type of contamination, the potential for exacerbating water quality impacts from climate change, and the community's long history and ongoing experience of environmental injustices.

The SF Bay Water Board oversees and directs pollution cleanup under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund, in conjunction with the

---

JAYNE BATTEY, ACTING CHAIR | EILEEN WHITE, EXECUTIVE OFFICER

1515 Clay St., Suite 1400, Oakland, CA 94612 | [www.waterboards.ca.gov/sanfranciscobay](http://www.waterboards.ca.gov/sanfranciscobay)

US Environmental Protection Agency Region 9 and the California Department of Toxic Substances Control. Together we are the primary regulatory agencies overseeing the Navy's environmental cleanup of the Hunters Point Naval Shipyard Superfund Site. In addition, the SF Bay Water Board oversees and directs pollution prevention and control related to all other pollution releases to surfaces or waterways that threaten or impact streams, the San Francisco Bay or groundwater underlying the area, including from industrial, commercial, residential, and municipal facilities and land. We agree that Superfund site cleanups should be implemented to adapt to and account for climate change, including sea and groundwater level rise. The existing Superfund remedy selection, implementation, and long-term evaluation/review process provide multiple water quality protection opportunities and activities that can and must consider potential climate issues, to increase resilience for the future.

The SF Bay Water Board is committed to addressing environmental justice in our region. Our staff has engaged historically and recently with leaders and representatives of community-based organizations and environmental justice advocates regarding the environmental and human health impacts from Hunters Point Naval Shipyard and its cleanup.

Additionally, the SF Bay Water Board has been planning, regulating, and addressing climate impacts for several years, specifically with responses to drought, wildfires, sea level rise and flooding. In the last few years in response to emerging climate science and community advocacy, the SF Bay Water Board has evaluated and expanded scientific research about potential impacts from groundwater rise. We have prioritized communities and facilities most vulnerable to water quality impacts for cleanup. Site changes and vulnerabilities are informed by evolving science and information, on incremental climate-related changes such as sea and groundwater level rise, seasonal changes in precipitation or temperatures, and changes in the intensity, frequency or duration of extreme weather events. Please note our [SF Bay Region Water Quality Control Plan](#) and Board Meeting Agenda for October 12, 2022, [Item 7](#).

The SF Bay has and continues to take the following actions, implemented by a team of geologists, engineers, environmental scientists and climate scientists:

- Addressing disadvantaged communities with the highest pollution and health burdens (historically red-lined neighborhoods, highest CalEnviroScreen scores) as our highest priority
- Assigning oversight to one or more staff in our Groundwater Protection Division or our Toxics Cleanup Division
- Hiring new staff with environmental justice and community engagement experience
- Requiring waste management or sites cleaning up release contamination to conduct assessments for vulnerability to contaminant mobilization from sea level rise or groundwater rise and propose adaptation plans
- Revising cleanup goals and/or remediation methods based on updated environmental justice priorities and/or studies indicating sea level or groundwater rise that elevates the risk of water quality or human health impacts from a site or to a community
- Approving remediation methods that protect against future contamination mobilization or flooding from sea level rise or groundwater rise

We are basing these actions on the following body and state of the science available and growing to inform and direct protective cleanup decisions for shoreline sites around SF Bay. We will continue to apply the relevant information to cleanup sites around the SF Bay, including for Hunters Point Naval Shipyard.

These are studies published recently:

- [Befus et al. 2020](#) - MODFLOW modeling of water table response to sea-level rise along the California coast (10m model resolution) - available for a range of hydraulic conductivity values. Includes projections of future depth to groundwater under a range of SLR scenarios. Data available for download [here](#) and for viewing on the [Our Coast our Future](#) webmap.
- USGS [Liquefaction storymap](#) - explains the impacts of sea-level rise on liquefaction severity around the SF Bay Area
- [Toxic Tides map](#) - exposure of hazardous facilities to sea-level rise, extreme tides, and storm surge. Does not include rising groundwater.
- [Plane et al. 2019](#) - rapid assessment of depth to groundwater for the SF Bay shoreline based on interpolation of empirical data. Data available for download [here](#).
- [May et al. 2020](#) - report for the City of Alameda. Refined depth to groundwater mapping, sea-level rise scenarios, and an investigation of the impacts of sea-level rise on contaminants (evaluated contaminants with potential concentrations above human health benchmarks).

This is a study underway that will be published soon:

- [Pathways and SFEI 2022](#) - refined assessment of depth to groundwater for 4 counties (Alameda, Marin, San Francisco, and San Mateo) based on interpolation of empirical data and including extensive review and ground-truthing. Includes projections of future depth to groundwater under a range of SLR scenarios. Data will be available fall 2022.

This is a recently funded future study to expand science coverage in SF Bay (and funded specifically by the SF Bay Water Board):

- Refined assessment of depth to groundwater for Contra Costa County (continuing work from Pathways and SFEI 2022)

These are proposed studies, not yet funded but currently under consideration to be funded in part or whole with public grant funds:

- Prop 68 proposal: Work in the Islais Creek watershed using a dynamic MODFLOW groundwater model to investigate changes in the water table due to sea-level rise and increases in extreme precipitation. The model will also be used to explore impacts of potential adaptation strategies and the potential for contaminant mobilization.
- Prop 68 proposal (led by [Coastal Quest](#)): one task of this project would be a refined assessment of depth to groundwater for Santa Clara County (same method as Pathways and SFEI 2022)
- [Port of Oakland](#) dynamic MODFLOW groundwater modeling and investigation of sea-level rise impacts.
- Integration of groundwater rise datasets into the Bay Conservation and Development Commission's [Bay Shoreline Flood Explorer](#) to help a broad range of stakeholders identify the points of intersection between sea-level rise and groundwater rise under different time-based scenarios.

The SF Bay Water Board reiterates that Hunters Point Naval Shipyard is one of our highest priorities for cleanup due to the extent and type of contamination, the potential for exacerbating water quality

impacts from climate change, and the community's long history and ongoing experience of environmental injustice.

The SF Bay Water Board continues to rely on our authorities under CERCLA and the California Water Code, and the growing body of best available science to oversee and direct the Navy's environmental cleanup of the Hunters Point Naval Shipyard Superfund Site. We are committed to regulating Superfund and other contaminated site cleanups to account for climate change, including sea and groundwater level rise.

If you have questions or want to speak further with SF Bay Water Board staff, please contact our Assistant Executive Officer, Lisa Horowitz McCann at (510) 622-2441 or at [lisa.mccann@waterboards.ca.gov](mailto:lisa.mccann@waterboards.ca.gov).

Sincerely,

 Digitally signed by  
Eileen White  
Date: 2022.09.27  
16:49:35 -0700

Eileen White  
Executive Officer

Copy:  
Office of Community Investment and Infrastructure  
[Thor.Kaslofsky@sfgov.org](mailto:Thor.Kaslofsky@sfgov.org)  
[lila.hussain@sfgov.org](mailto:lila.hussain@sfgov.org)

San Francisco Board of Supervisors  
[natalie.gee@sfgov.org](mailto:natalie.gee@sfgov.org)

Department of Toxic Substances Control  
[nelline.kowbel@dtsc.ca.gov](mailto:nelline.kowbel@dtsc.ca.gov)  
[julie.pettijohn@dtsc.ca.gov](mailto:julie.pettijohn@dtsc.ca.gov)  
[kimberly.walsh@dtsc.ca.gov](mailto:kimberly.walsh@dtsc.ca.gov)

United States Environmental Protection Agency  
[montgomery.michael@epa.gov](mailto:montgomery.michael@epa.gov)  
[herrera.angeles@epa.gov](mailto:herrera.angeles@epa.gov)  
[chesnutt.john@epa.gov](mailto:chesnutt.john@epa.gov)

San Francisco Bay Regional Water Quality Control Board  
[jessica.watkins@waterboards.ca.gov](mailto:jessica.watkins@waterboards.ca.gov)  
[alec.nauble@waterboards.ca.gov](mailto:alec.nauble@waterboards.ca.gov)  
[nathan.king@waterboards.ca.gov](mailto:nathan.king@waterboards.ca.gov)