



SAN FRANCISCO PUBLIC UTILITIES COMMISSION

1155 Market St., 11th Floor, San Francisco, CA 94103 • Tel. (415) 554-3155 • Fax (415) 554-3161 • TTY (415) 554.3488



John Swiecki, Principal Planner
City of Brisbane
Community Development Department
50 Park Place
Brisbane, CA 94005

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March 24, 2006

Dear Mr. Swiecki:

This letter comments on the Initial Study for the Brisbane Baylands Phase I Specific Plan of February 22, 2006. The Wastewater Enterprise of the San Francisco Public Utilities Commission (SFPUC) provides sewage collection and treatment services to the majority of Brisbane including the area of the proposed project. Therefore, the SFPUC believes that the environmental review for the project should include a complete analysis of any new wastewater flows that would be created in the proposed project and potentially discharged to San Francisco's combined sewer system. The review should also examine how the wastewater flows in the proposed project would impact the city's combined sewer system.

The SFPUC anticipates that the sanitary sewage flows from the proposed project will enter San Francisco's combined sewer system via the Sunnydale pump station and will be treated at the Southeast Water Pollution Control Plant. Increased flows within this portion of the city's combined sewer system could contribute to localized flooding and may cause an increase in the frequency of combined sewer overflow discharge events. Any increases in the frequency of combined sewer overflow discharges could adversely affect the SFPUC's operating permit from the Regional Water Quality Control Board. Furthermore, increased treatment demands at the Southeast Plant from the proposed project could impact the SFPUC's planning and management of biosolids generated at the plant. The environmental review for the proposed Project should thoroughly examine the effects of the increased flows and should propose means, including alternative sewer systems, to mitigate those effects.

In addition, the analysis of sanitary sewage flows from the proposed project should address the specific criteria stipulated in the Joint Exercise of Powers Agreement (Agreement) between the city of Brisbane, the Guadalupe Improvement District, and the city and county of San Francisco (July, 1995), which governs the sanitary sewage flows from Brisbane to San Francisco. These criteria include a maximum dry weather flow, peak wet weather flows (to account for infiltration), and a maximum instantaneous peak flow rate. As stipulated in the Agreement, wastewater flows

from Brisbane should not include any stormwater. The analysis of the impacts of the proposed project on San Francisco's combined sewer system should account for possible storm water infiltration during wet weather conditions.

The SFPUC appreciates the opportunity to provide comments to the city of Brisbane for the proposed Baylands project. Please contact Bob Hickman of my staff at 415.551.4529 if you have any questions about our comments.

Sincerely,

Bill Keaney
Division Manager, Wastewater Planning and Compliance

