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SAN FRANCISCO PUBLIC UTILITIES COMMISSION

1145 Market St., 5th Floor, San Francisco, CA 94103 • Tel. (415) 554-3131 • Fax (415) 934-5728

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January 14, 2011

John Swiecki, AICP, Community Development Director
City of Brisbane Community Development Department
50 Park Place
Brisbane, CA 94005
By Electronic Mail

RE: Revised Notice of Preparation of an Environmental Impact Report for the Brisbane Baylands Project Dated December 10, 2010

Dear Mr. Swiecki:

Under the provisions of Section 15082 of the CEQA Guidelines, the San Francisco Public Utilities Commission (SFPUC) hereby submits comments on the December 10, 2010 Notice of Preparation for the Brisbane Baylands Specific Plan Programmatic Environmental Impact Report (EIR). This letter is intended to amend our previous comment letter submitted on January 10, 2011.

Currently, the SFPUC Wastewater Enterprise (WWE) provides sewage collection and treatment services to the City of Brisbane and the Bayshore Sanitary District. The analysis of sanitary sewage flows generated by the proposed project should address the specific criteria stipulated in the Joint Exercise of Powers Agreement Between the City and County of San Francisco, the City of Brisbane, and the Guadalupe Valley Municipal Improvement District (Brisbane JPA) (July 1995) and the Joint Exercise of Powers Agreement Between the City and County of San Francisco and Bayshore Sanitary District (Bayshore JPA) (July 1995), which govern sanitary sewage flows from the City of Brisbane and the Bayshore Sanitary District, respectively.

Additionally, the draft environmental impact report (Draft EIR) for the proposed project should include a complete analysis (including computer and physical modeling) of any new wastewater flows that would be generated by the proposed project and potentially discharged to San Francisco's combined sewer system. This analysis should account for possible stormwater infiltration during wet weather conditions. The Draft EIR should examine how the wastewater and stormwater flows in the proposed project would impact the City's combined sewer system (specifically the existing 6.5 feet diameter Sunnydale Sewer, the new 11 feet diameter Sunnydale Auxiliary Tunnel (San Francisco Planning Department File Number 2009.0311E), and the Sunnydale Transport/Storage Facility at Harney Way), flooding, combined sewer overflow discharge events, biosolids management, and current and future Regional Water Quality Control Board National Pollutant Discharge Elimination System (NPDES) permit requirements. The project sponsor and the City of Brisbane should be aware that if a development project alternative is selected which would discharge wastewater into the City and County of San Francisco sewer system, then

the development area is subject to compliance with applicable San Francisco Public Works Code requirements (such as Article 4.1: Industrial Waste and Article 4.2: Sewer System Management). Also, as per the terms of the existing JPA, the project sponsor would be responsible for payment of applicable capacity charges. In summary, the Draft EIR should thoroughly evaluate the effects of the increased flows on San Francisco's combined sewer system and should also demonstrate how the proposed on-site water recycling facility would mitigate those effects.

Lastly, Section V.B.C.i of the Brisbane Baylands Project Description (November 2010) states that currently "the remainder of the stormwater is drained into San Francisco's Sunnydale Avenue combined sewer main." Please be aware that the terms of the Brisbane JPA and the Bayshore JPA do not provide for treatment of any stormwater flows by the SFPUC at the Southeast Water Pollution Control Plant.

The SFPUC appreciates the opportunity to comment on the City of Brisbane Revised Notice of Preparation of an Environmental Impact Report for the Baylands project. Please contact Betsey Eagon at 415-554-1871 if you have any questions about our comments.

Sincerely,

Barry Pearl

for Irina P. Torrey, AICP, Manager
San Francisco Public Utilities Commission Bureau of Environmental Management

Cc: Marla Jurosek, Manager, SFPUC Wastewater Enterprise, Planning & Regulatory Compliance Division
Manfred Wong, Senior Project Manager, SFPUC Project Management Bureau
Molly Petrick, SFPUC Water Enterprise, Water Resources Planning
Betsey Eagon, SFPUC Wastewater Enterprise, Planning & Regulatory Compliance Division