



SEWER SYSTEM

IMPROVEMENT PROGRAM
Grey. Green. Clean.

Public Comment
SWRP & Prop 1 Funding Guidelines
Deadline: 10/13/15 by 12:00 noon

525 Golden Gate Ave
9th Floor
San Francisco, CA 94102

October 13, 2015

Via e-mail: commentletters@waterboards.ca.gov



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: Comment Letter – Storm Water Resource Plan Guidelines and Proposition 1 Funding Guidelines

Dear Ms. Townsend,

The San Francisco Public Utilities Commission (SFPUC) would like to thank the State Water Resource Control Board (SWRCB) for this opportunity to comment on the Storm Water Resource Plan Guidelines (Plan) dated August 26th, 2015 and the Proposition 1 Storm Water Grant Guidelines (Grant) dated August 2015.

The SFPUC is a department of the City and County of San Francisco that provides retail drinking water and wastewater services to San Francisco, wholesale water to three Bay Area counties, and green hydroelectric and solar power to San Francisco's municipal departments. The Sewer System Improvement Program is a 20-year infrastructure improvement program to ensure the system is reliable, compliant and resilient. San Francisco is served almost entirely by a combined sewer system (CSS), meaning that the sewer system infrastructure captures and treats both wastewater and storm water. The SFPUC herein requests changes to the Plan and Grant guidelines to ensure that storm water resource planning for combined sewer systems are included and suggests a few additional clarifying edits for this purpose.

In order to assist SWRCB staff in locating the sections of the Plan and Grant Guidelines that are being referenced, the page number and text location, whenever possible, are provided prior to the comment and requested language change.

Comments on the Storm Water Resource Plan Guidelines:

Comment 1. We propose the following changes to ensure that CSS are included:

- a. Page 4 (3rd line): "...systems (MS4), combined sewers systems (CSS), and flood control infrastructure used for this purpose may have been..."

- b. Page 4 (third paragraph, 4th line): “...requirements to control storm water and combined sewage discharges.”
- c. Page 5, Acronym and Key Words: Addition of: CSS combined sewer system
- d. Page 7, Definitions: **Combined Sewer System (CSS)** - sewers that are designed to collect storm water and dry weather runoff, domestic sewage, and industrial wastewater in the same pipe.
- e. Page 12 (4th Paragraph, 6th line): “...capture and use. Combined sewer systems (CSS) are also regulated by NPDES permits.”
- f. Page 13 (4th paragraph, 7th line): “... by MS4 NPDES permittees, Regional Water Boards...”

Comment 2: We suggest the following clarifying edits:

- a. Page 17 (2nd paragraph, item #2): “The watershed should be the largest practicable to allow for comprehensive and integrated storm water management and if practical across multiple jurisdictional boundaries.”

2.a Discussion: The City and County of San Francisco is a peninsula bounded by the Pacific Ocean and San Francisco Bay; therefore, no other jurisdictions are located within its watersheds.
- b. Page 17 (3rd paragraph, item iii): Suggest that this item become a suggested section of the plan as opposed to a requirement.

2.b Discussion: The SFPUC has conducted comprehensive storm water planning analysis as part of its Sewer System Improvement Program. As San Francisco is primarily a CSS, these studies have focused on hydraulic and other water quality and beneficial uses of storm water. Therefore, we recommend that this item not be required within the plan, but can be included in a cover letter or addendum.
- c. Page 21 (Section 2a, 2nd & 3rd line): “how existing and proposed projects/programs ~~comply with an~~ are consistent with the objectives of the applicable NPDES permit.”

2.c Discussion: Suggest that “comply” be removed. The SFPUC is in compliance with their NPDES permit; however, we also recognize the importance of improved storm water management. The SFPUC is dedicated to better managing storm water which supports the goals and objectives of our NPDES permits.
- d. Page 27 (Section E1, 3rd line): “The Plan should include, but is not required to include, the following item to ensure support its effective implementation ...”

2.d Discussion: The legislation under 10562(d)(8) is about multiple benefits and appropriate decision support tools and data. Items **a** and **b** would be helpful but they should not be required in the plans, there is no specific basis in the legislation to require them.

- e. Page 29 (Section F, 3rd paragraph, 5th line): "*The development of the Plan should include provide for public education and public participation goals addressing the following elements...*"

2.e Discussion: Generally a Plan will not include the public participation and public education, rather the development of a plan will ensure that the project/process relies on these two essential components. Using the words "*provide for*" is consistent with the legislation. All the elements are appropriate to cover and employ through the development of the Plan.

Comments on the Proposition 1 Storm Water Grant Guidelines:

Comment 3. We propose the following changes to ensure that CSS are included:

- a. Page 35 (Item 1.a): "*Implement goals, objectives, and requirements of a municipal storm water permit including an MS4 or a CSS permit, help...*"

Comment 4. We propose streamlining the Implementation Proposal Application Requirements.

- a. Page 30 (Item 3.16 - Budget): Consider amending the written budget requirements as follows:
- a) "*A description to support each budget category, ~~tasks, and important subtasks;~~*"
 - b) "*An explanation of how the costs were estimated, ~~the preliminary bids provided, and past experience used to justify the costs;~~*"
 - c) "*A discussion on the project capital and operations and maintenance (O&M) costs, ~~how those costs compare to industry standards, the life cycle of the project, and how long the project will remain operational before it requires replacement;~~*"

4.a Discussion: Removed items do not add value to the application as most of this information will all be in the detailed budget. Generally, the extent of these written explanations is an undue burden on applicants.

- b. Page 31 (Item 4.18 - Schedule): Consider amending the written schedule requirements as follows:
- a) "*A discussion on how the timeline is consistent with the workplan and budget;*"
 - b) "*A description of the ~~possible obstacles to completing the tasks or subtasks;~~*"
 - c) "*A discussion relating to the elements of the project, their current status, ~~and how the tasks and subtasks will be completed in a timely manner; and~~*"

4.b Discussion: Removed items do not add value to the application as this information will all be in the Gantt Chart and Work Plan. Generally, the extent of these written explanations is an undue burden on applicants.

- c. Page 29 (Item 2.12 Workplan): Consider amending the workplan requirements as follows:
c)" *Site Investigation: discuss research completed to select the site that may include including, but not limited to, GeoTracker and...*"

4.c Discussion: The SFPUC has conducted extensive site investigation including surveys, geotechnical borings, potholing, etc, however, these projects have not utilized GeoTracker and EnviroStor.

- d. Page 32 (Attachment 8 Technical Report Summary): *Consider amending the last sentence as follows: "These reports that are summarized should be consistent with the basis for the Plan included as Attachment 1".*

4.d Discussion: Some project specific reports may be developed after the Plan is completed as they are intended to implement the project consistent with the Plan.

Comment 5: We suggest the following clarifying edits:

- a. Page 31 (Item 3.16.E): *"A discussion on how the project is economically feasible ~~and a good use of State funds, such as~~ the cost per gallon treated/captured and/or another measure of economic benefit such as the Triple Bottom Line approach, and a description of how the project data will be used to demonstrate the economic benefits of the implemented approach."*

5.b Discussion: Please provide criteria for what is meant by a "good use of State funds;" without such criteria the requirement should be eliminated. Consistent with sustainability goals, the SFPUC is using a Triple Bottom Line approach to measure all benefits, not just "economic" benefits, of a project.

- b. Page 42 (Storm Water): Suggest revising definition of Storm Water.

5.c Discussion: This definition is different from the one provided in 10561.5 (b) and in the proposed Storm Water Resource Plan Guidelines (8-26-15) on page 8. Consider aligning the definition of storm water between documents.

The SFPUC appreciates the opportunity to provide written comments on this important program. If you have any questions regarding the comments provided, please contact Alexandra Gunnell at agunnell@sflower.org or 415-551-4505.

Sincerely,

A handwritten signature in blue ink that reads "Karen Kubick".

Karen Kubick, Program Director
Sewer System Improvement Program

