



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



April 23, 2010

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State of California
Department of Water Resources
Division of Integrated Regional Water Management
Attn: Joe Yun
P.O. Box 942836
Sacramento, CA 94236-0001

Subject: Comments on Draft IE Proposal Solicitation Package

Dear Mr. Yun,

The San Francisco Public Utilities Commission (SFPUC) appreciates the opportunity to comment on the draft Prop 1E Proposal Solicitation Package (PSP). We recognize the tremendous amount of work that went into the development of the PSP, and understand the need for such a comprehensive application process in order to evaluate the numerous stormwater projects throughout the State. However, we believe this process is not necessary for the \$20,000,000 allocated for combined municipal sewer and stormwater systems.

SBx2 1 specifically allocated \$20,000,000 for “...**local agencies to meet immediate water quality needs related to combined municipal sewer and stormwater systems to prevent sewage discharges into state waters**”. These issues are unique to a small number of local agencies in California that have some of the oldest sewer systems in the state, with unique structural challenges related to flooding. While combined sewers protect our environment by collecting and treating all stormwater, combined sewers are also challenged by system overflows that can occur during large storm events. Due to the unique characteristics of combined sewer systems, and the small pool of potential applicants for these funds, we suggest that these funds be removed from the 1E Proposal Solicitation Package and instead be subject to a much more streamlined process which is separate from a regional application.

The SFPUC proposes that agencies with combined sewer systems work directly with DWR on a separate, streamlined process for both applying for and awarding these funds. We recognize that the eligibility requirements listed in the current PSP must apply. However, we feel many of the attachments would not be necessary and/or should be altered slightly. These attachments include:

- Attachment 3 (Work plan) – This attachment should be changed to the Project Description/Need. This would eliminate the need for many of the attachments that follow.

- Attachments 7 – 10 should be deleted as the information can be included in the Project Description/Need section.
- Attachment 11 (Program Preferences) – It is unclear if this attachment is necessary as SBx2 1 specifically allocates \$20,000,000 for “local agencies to meet immediate water quality needs related to combined municipal sewer and stormwater systems to prevent sewage discharges into state waters”.

We appreciate the opportunity to comment and hope you will take our suggestions into consideration when finalizing the PSP. We are all committed to making the best use of these funds, while getting the funds out as expeditiously as possible. We believe the above changes to the PSP will allow this to happen. Please let me know if you have any questions or would like to talk further.

Sincerely,

Molly Petrick
Water Resources Analyst, Grants and Policy
SFPUC
(415) 934-5767
mpetrick@sfgwater.org
