

BAWSCA

Bay Area Water Supply & Conservation Agency

April 10, 2008

Mr. Donald Parker, Chair
California Seismic Safety Commission
1755 Creekside Drive, Suite 100
Sacramento, CA 95833-3637

Mr. Mark B. Horton, M.D., MSPH, Director
California Department of Public Health
P.O. Box 997377, MS 0500
Sacramento, Ca 95899-7377

Subject: SFPUC Report to CSSC and CDPH "Notice of Changes to WSIP" dated March 31, 2008

Dear Mr. Parker and Mr. Horton:

In compliance with California Water Code Division 20.5, Section 73500 et seq., the San Francisco Public Utilities Commission (SFPUC) has provided the California Seismic Safety Commission (CSSC) and California Department of Public Health (CDPH) a report outlining recently adopted changes to its Water System Improvement Program (WSIP) titled "Notice of Changes to Water System Improvement Program" (March 31, 2008).

As the public agency that represents the interests of 25 cities and water districts, and two private utilities, in Alameda, Santa Clara and San Mateo counties that purchase water on a wholesale basis from the San Francisco regional water system, the Bay Area Water Supply and Conservation Agency (BAWSCA) has been closely following SFPUC's proposed revisions to its WSIP. BAWSCA is currently reviewing the referenced report and will provide detailed comments to each of your organizations shortly.

The SFPUC's changes to the WSIP followed its comprehensive review of project scopes and schedules. Given the number of projects and individual revisions, Mr. McCarthy, Executive Director of the CSSC, asked if BAWSCA could provide comments that might help focus the reviews. This letter addresses his request and may be useful to both the CSSC and the DPH.

BAWSCA has reviewed the preparatory documents in detail and supports the vast majority of changes adopted by the SFPUC. BAWSCA did provide the SFPUC with several specific recommendations in the attached letter.

To help your review I suggest you examine the following three specific issues.

1. Reliability of Facilities in Sunol Valley Following a Major Seismic Event

The proposed scope for facilities in the Sunol Valley relies entirely on a single pipeline, the New Alameda Siphon #4, to bring water from Hetch Hetchy through Sunol Valley to the Irvington Tunnel. The proposed scope assumes all other facilities in the Sunol Valley would fail or be unavailable following such an event in the nearby Hayward and Calaveras earthquake faults. Given the critical need to access supplies through this area, BAWSCA believes the SFPUC should examine what more can be done, and at what cost, to provide additional redundancy at this geographical location. At the SFPUC hearing on February 26,

2008 prior to the adoption of changes to the WSIP, BAWSCA recommended that the Commission request staff to provide a report to the Commission with proposed recommendations to address this issue by June 2008. The State should consider whether it is satisfied with the SFPUC's proposed approach in this area or whether implementation of additional redundancy in this area would be beneficial to the overall reliability of the water system and protection of public health and safety.

2. Schedule for Completion of Seismic Upgrade of BDPL Nos. 3 & 4 at Hayward Fault

The SFPUC has worked to identify the best possible solution for the complex technical issues posed at this location; however completion of this project is being delayed 26 months. Given the criticality of the pipelines at this location to the health and safety of the customers that rely upon the Regional Water System, BAWSCA firmly believes that the SFPUC should complete this project as soon as possible. There appear to be opportunities to accelerate completion of this project. At the February 26, 2008 SFPUC hearing, BAWSCA recommended that the Commission request staff to include proposed recommendations to address the needed schedule acceleration to the Commission in June 2008. The State should consider whether it is satisfied with the proposed schedule for this project or if further investigation into possible schedule acceleration would be beneficial to the overall program and the protection of public health and safety.

3. New Engineering and Geotechnical Information for Harry Tracy Water Treatment Plant

Recently performed studies by the SFPUC uncovered critical engineering and geotechnical information that bring into question the viability of the existing treatment plant and the magnitude of work that would need to be done at that site for it to be a reliable component of the Regional Water System. The SFPUC staff has committed to providing a report with recommendations to the Commission in August 2008. Given this new information, the State should consider whether the SFPUC's current project scope and approach for addressing the new information is appropriate or whether changes should be made at this time to address public health and safety concerns with this project.

BAWSCA appreciates the opportunity to convey our comments to you. Additional comments will be forthcoming following our complete review of the referenced report. If you have any questions, please call me at (650) 349-3000.

Sincerely,



Arthur R. Jensen
Chief Executive Officer/General Manager

Attachment

cc: Board of Directors
R. McCarthy, CSSC
R. Howell, CDPH
R. McDevitt, Hanson Bridgett
E. Harrington, SFPUC
J. Labonte, SFPUC