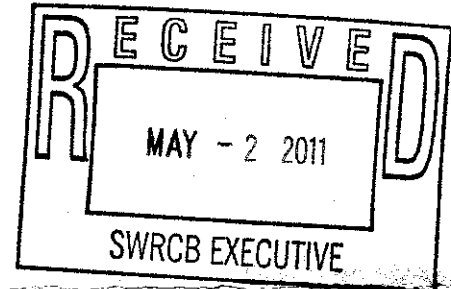


Tamalpais Community Services District

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April 28, 2011

Jeanine Townsend
SWRCB Board Clerk
CA SWRCB
1001 I Street
Sacramento, CA 95814



Subject: Comments Letter Regarding WDRs Review and Update

Dear Ms. Townsend,

The Tamalpais Community Services District (TCSD) appreciates this opportunity to comment on the proposed revisions to the Sanitary Sewer System Waste Discharge Requirements, also referred to as the WDRs.

TCSD is a public collection system serving 7,000 residents (2,550 connections) in the Tamalpais Valley of Southern Marin County. Our terrain stretches from marshlands in Richardson Bay which connects to the San Francisco Bay, to the top of ridge lines of the mountains along the Marin Headlands. Our collection system consists of 32.3 miles of pipe ranging in size from 4 to 16 inches. Over the past several years, TCSD has undertaken aggressive new efforts to upgrade our maintenance and capital repair program. From 2007 to 2010, the number of SSOs has decreased from 13 to just 4 and the number of miles of pipe that we have replaced or repaired is nearly 20% of our entire system including 10% of all private laterals (aided by our private lateral revolving loan fund).

We have also joined with Central Marin Sanitary District in their aggressive efforts to manage Tam Valley's major FOG (fats, oils, and grease) generators. We have contacted these businesses and required upgrades to their grease traps and established regular inspections and a permit program. This has resulted in significant reductions in FOG within our sewer lines and an increased awareness among local businesses.

TCSD also continues to refine our internal management practices and have used training and policy efforts from David Patzer with Risk Management Solutions to help us streamline our responses and spill management efforts. This direction is strongly supported by our Board of Directors as well as the community which lead to nearly unanimous support in December 2009 of a successful sewer rate increase via a Prop 218 Rate Hearing (rates increased from \$701 to \$1,013 annually). This allows TCSD to using the existing WDRs to successfully upgrade our systems.

However, the District is confused as to why the Board feels the need to undertake such a radical change in the WDR program. We understand that program requirements evolve to meet new challenges, but the changes proposed are almost overwhelming and difficult to grasp. TCSD has developed a good working relationship with our residents through addressing private lateral spills and repairs. In most cases, residents are vulnerable to the first plumber they choose in the phone book when there is an emergency. TCSD is striving to develop a relationship with residents to contact our offices first to get guidance and assistance in these matters. To turn the trust we are striving to build with residents into a strictly regulatory relationship would destroy our progress. TCSD dutifully complies with the updates and audits of the SSMP, but to transfer our small staff's efforts from field maintenance to paper pushers will not address the issues of the State Board.

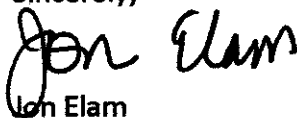
The most onerous of all the proposed rules relates to the idea of requiring NPDES permits for collection systems that have even one spill into a public water way. The reasons for spills can vary greatly. Last year, CalTrans had a contractor working on Highway 1 at night and the District was notified at 2:00 a.m. when the contractor drilled into our sewer line and the line overflowed into an adjacent public marsh. Would this type of spill fall into the category that would be processed by the NPDES? This further reflects that this proposal is not in line with the issues it seeks to address.

Sewer collection systems in the Bay Area have undertaken large amounts of work over the past five years, with much of this due to an increased awareness by sewer agencies and their outreach and education efforts with their communities. If you look at the increased funds that are flowing into sewer treatment and collection efforts, you will also see that dozens of agencies have had to raise their rates and increase fiscal support by millions of dollars. There has been no other basic community infrastructure that has seen so much investment and political commitment, and this should be lauded instead of punished with more rules and regulations.

TCSD often uses potable water for site cleanup and the proposed regulation to use de-chlorinated water in future is simply unrealistic. This is a drastic requirement that should first have public discussion and review instead of being buried in a treatise of proposed State rules and regulations.

These are simply a few of our concerns raised by these proposals. We appreciate the opportunity to submit our comments on these draft proposals and hope you will continue to solicit responses for future versions.

Sincerely,



Jon Elam

General Manager