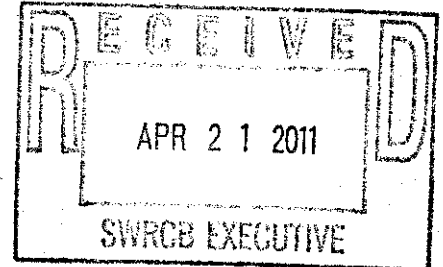


TOMALES VILLAGE

COMMUNITY
SERVICES
DISTRICT



April 21, 2011

SWRCB Division of Water Quality
Statewide SSO Program
1001 'I' St., 15th Floor
Sacramento CA 95814

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RE: Draft Waste Discharge Requirements for Sanitary Sewer Systems (SSS WDR)

The Tomales Village Community Services District operates a collection, treatment and disposal system for the municipal wastewater of the small town of Tomales with a population of 210. The system serves 98 hookups and two school campuses, with a total of 1.5 miles of collection lines. As such, we have been required to participate in the statewide SSO WDR (Order WQ 2006-003) even though we are currently operating under our own WDR. This has been a burden on our small district that has a contract operator and one staff member, not to mention the constant notices regarding our SSMP.

The proposed revisions represent a major departure from the program that has been implemented under the SSO WDR. The new draft SSS WDR needs to be scaled back significantly and allow the programs and progress begun under the existing SSO WDR to be fully implemented. Many of us have already expended major expenses in capital improvements that haven't even been given the time to show their benefits.

The new SSS WDR requirement of being liable for the reporting of Private Sewer Laterals, located on private property over which we have no authority, places the District in a legal quandary that could in fact lead to privacy issues, taking of private property issues and drawn out litigation that could bankrupt a small system. This continued direction of the SWRCB for one size fits all programs is ill conceived, punitive and costly to small public agencies.

There is no indication that the increased costs, efforts and exposure to litigation from these new proposals will appreciatively improve the system or decrease potential SSO, or provide a corresponding benefit to the public or the environment. Please reject this draft SSS WDR and give the existing plan a chance to work,

Sincerely,

A handwritten signature in black ink, appearing to read "Karl Drexel".

Karl Drexel, Administrator

cc: CWEA
RWQCB
TVCSB Board

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Tomales, CA 94971

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