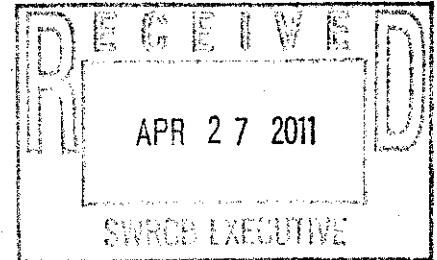


Public Comment
Sanitary Sewer System WDR
Deadline: 5/13/11 by 12 noon

foundation

April 27, 2011

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



Re: **Comments Regarding Proposed SSS WDR**

Honorable Board Members:

The private property community of Leisure World Seal Beach has a population of about 8,000 residents, and owns and operates a collection system with over 11 miles of sewer mains and two sewer pumping stations.

Leisure World is committed to, and supports, sewer system management including working with the City of Seal Beach and the Orange County Sanitation District.

Leisure World hereby submits the following comments on the proposed SSS WDR that would replace the existing statewide SSO WDR (Order No. 2006-0003-DWQ):

1. The proposed order was published on March 24, 2011 and written comments must be submitted by April 29, 2011. This period should be lengthened to allow sufficient time to analyze the impact to our community. Our budgets have already been prepared while analysis on the proposed SSS WDR is just beginning.
2. The majority of the proposed provisions of the SSS WDR were not discussed at any of the state-sponsored order review and data review committees dedicated to improving the WDR and the MRP. There should be a guidance committee formed similar to 2005-2006 to provide dialogue and open discussion to truly understand the impact of the proposed provisions.
3. The requirements for private communities to now enroll in and develop a certified system specific Sewer System Management Plan will impact the fixed-

State Water Resources Control Board
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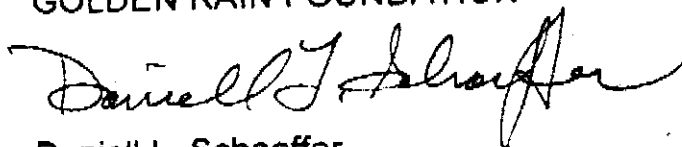
income retired residents of Leisure World Seal Beach. Preliminary studies indicate a significant cost to comply with these changes. This Community has maintained and budgeted for the upkeep of our sewer system since the development of this community; therefore, we request that private property communities be exempt from enrolling in this program.

4. Although not included in the proposed WDR, the concept of having an agency change from coverage under the state order to an NPDES permit due to a spill reaching surface waters would take away the uniformity of agencies complying with the order. This two-tiered approach will discourage agencies from working in groups to share knowledge and programs.

In summation, Leisure World Seal Beach urges the state to eliminate the requirement of private property communities to qualify for the SSS WDR and expand the comment period to allow in-depth analysis and comments on the proposed SSS WDR to insure the final document is clear and reasonable.

Sincerely,

GOLDEN RAIN FOUNDATION



Daniell L. Schaeffer
Administrator Leisure World Seal Beach

DS/kmd