

# ORCUTT

Union School District

Public Comment  
Draft IGP  
Deadline: 4/29/11 by 12 noon

ROBERT HATCH  
KATHLEEN MEISSNER  
DR. JAMES PETERSON  
JANET ZILLI

BOB BUSH  
District Superintendent  
HOLLY EDDS, Ed.D.  
Assistant Superintendent  
MARYSIA OCHEI  
Assistant Superintendent  
JAN VANAGISAKO  
Assistant Superintendent

Where a Dedicated Staff Means  
**KIDS COME FIRST**

4/18/11

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 "I" Street, 22<sup>nd</sup> Floor  
Sacramento, CA 95812



RE: Comment Letter – Draft Industrial General Permit

Dear Ms. Townsend:

This letter is to inform you that the Orcutt Union School District is concerned about the negative impact that the Draft Industrial General Permit proposed by the State Water Resources Control Board (SWRCB) would have on our district. Specifically, because the Permit would result in increased costs for our district but does not include funding to mitigate these costs, the Permit would put our district in the unenviable position of weighing water quality against educational programs. The following is a summary of our district's concerns.

### Increased Costs

The cost of complying with the Permit is estimated to be \$29,400 per bus maintenance yard and could increase to over \$100,000 if numeric limits are exceeded and advanced treatment is required. K-12 education funding has been reduced by 20%. Furthermore, the Governor's 2011-12 State Budget proposes to reduce per-pupil K-12 funding by \$2 billion or \$330 per student. If current temporary tax extensions are not approved by the voters, the Legislative Analysts' Office (LAO) estimates that school funding could be reduced by an additional \$4.8 billion. As a consequence, our district simply cannot shoulder the new costs that the Draft Industrial General Permit would impose.

### New Inspections Required

Schools are currently required to comply with numerous federal and state compliance requirements - the Draft Industrial General Permit would require a significant amount of new and revised inspections and record-keeping at a time when our district is dealing with significant reductions in staff resources.

### Numerics

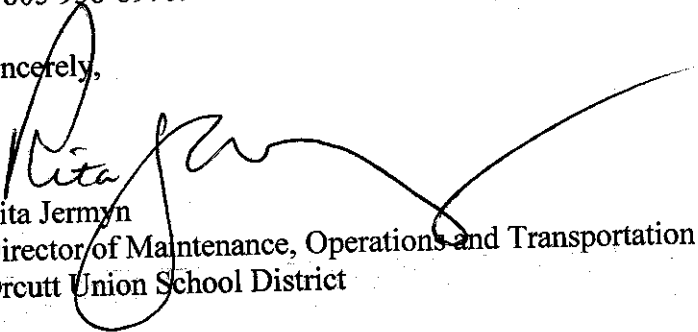
Our district agrees with the California Water Quality Association's (CASQA) analysis that the inclusion of Numeric Action Levels (NAL) and Numeric Effluent Limits (NEL) into the Permit is an incorrect adaptation of the United States Environmental Protection Agency's processes into a storm water permit.

Group Monitoring

The Permit eliminates group monitoring. Third party group monitors are a vital source of information and expertise and provide training, monitoring schedules, review of compliance reports, and analysis of water samples - eliminating group monitoring would result in a loss of critical expertise and result in diminished compliance.

In conclusion, the Orcutt Union School District urges the SWRCB to consider our concerns as you move toward adoption of the Draft Industrial General Permit. Questions regarding this letter should be made to Rita Jermyn at 805 938-8970.

Sincerely,



Rita Jermyn  
Director of Maintenance, Operations and Transportation  
Orcutt Union School District

cc: Mr. Charles R. Hoppin, Member, Chair, SWRCB  
Ms. Frances Spivey-Weber, Member, Vice-Chair, SWRCB  
Ms. Tam M. Ducoc, Member, SWRCB  
Ian Padilla, Coalition for Adequate School Housing (C.A.S.H.)