



A World of Cultures
United in Learning



**Ohlone
Community
College District**

43600
Mission Boulevard
Fremont
California
94539-0390

**Ohlone
College Newark
Center for
Health Sciences
and Technology**

39399
Cherry Street
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California
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**President /
Superintendent**

Douglas Treadway, Ph. D.

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Garrett Yee

June 10, 2008

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95812

Dear Ms. Townsend:

On behalf of the Ohlone Community College District I request that you reconsider a very onerous Draft Storm Water Construction General Permit proposed by the State Water Resources Control Board (SWRCB). The District has constructed several major projects since 2000, including the first educational facility in the United States to soon achieve a Platinum LEED certification, with no adverse affect on storm water runoff; therefore we don't understand the need for us to undertake a significantly more onerous process.

Our specific concern is as follows:

- **Addition of Regional Water Quality Control Boards to the Review Process.**

Community college construction projects are already reviewed and approved by four different state "agencies" (i.e., Division of State Architect, Board of Governors, Department of Finance/Public Works Board and Legislative Analyst's Office). By adding the regional boards to the review process, an already lengthy process will be further extended. Additionally, we are concerned that the Draft Permit does not specify a deadline for completing the regional board review process.

It is more economical and practical to have one of the above-mentioned state agencies also review the plans for storm water compliance. This is especially relevant because the regional boards have never been adequately staffed to even implement designation of school districts to participate in the Small MS4.

We recommend that: (1) the storm water construction permit and plan review function be given to one of the existing state agencies involved in performing related review activities or (2) a 30 day automatic approval be granted after the application is submitted to the regional board, if the regional board has not taken action on the application within that time frame.

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The Ohlone Community College District requests that you give strong consideration to our recommendations. Questions regarding this letter should be made to me at (510) 659-7307, or at email address mcalegari@ohlone.edu.

Sincerely,

Michael J. Calegari
Vice President of Administrative Services

cc: Ms. Doduc, Chair, SWRCB
Mr. Wolf, P.E., PhD, Vice Chair, SWRCB
Mr. Baggett, Jr., Member, SWRCB
Mr. Hoppin, Member, SWRCB
Ms. Spivy-Weber, Member, SWRCB
Mr. Chang, Los Angeles County Office of Education (LACOE)
Ms. Gibbs, LACOE