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CALIFORNIA'S  
COALITION  
*for* ADEQUATE  
SCHOOL HOUSING

SPECIAL HEARING  
2/3/05  
cc: BD, DI, DWQ  
E-cys: BD, CC HMS, TH, CMW

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Testimony

Coalition for Adequate School Housing (C.A.S.H.)  
February 3, 2005

State Water Resources Control Board

Public Hearing on Industrial Permit

Thursday, February 3, 2005

Joe Serna/Cal/EPA Building

1001 I Street, Sacramento, CA

- My name is Ian Padilla and I represent the Coalition for Adequate School Housing (C.A.S.H.). C.A.S.H. was formed in 1978 to promote, develop and support the enactment of new statewide and local funding alternatives for school construction and renovation. C.A.S.H. represents nearly 500 school districts serving 92 percent of California's public school children.
- In 2003, the SWRCB approved the Small MS4 Storm Water Permit which among other things included schools under its regulatory authority. Since that time, C.A.S.H. has made systematic efforts to inform our members about the new requirements through conferences, workshops and distribution of timely information. The C.A.S.H. Board of Directors created the C.A.S.H. Storm Water Committee for this purpose.
- California schools have been facing an on-going fiscal crisis for the past four years. Schools are struggling to balance their budgets, and the result has been drastic measures such as eliminating classes and closure of schools.
- In addition, state regulation of school construction has become a very complex and lengthy process, which includes oversight by the Office of Public School Construction, the California Department of Education Facilities Planning Division, the Division of the State Architect, the Department of Toxic Substances Control, the Department of Industrial Relations, and the California Finance Authority.

- These factors make it very difficult to meet the proposed changes to the Industrial Permit.
- Specific areas of concern:
  1. Minimum BMPs
  2. Strict numerical discharge standards
  3. Extensive testing
  4. “Light industrial” dischargers into the Industrial Permit
- The majority of the education community realizes that schools should not be completely unregulated; however, there is broad agreement that schools should remain regulated under the requirements of the existing Industrial Permit.
- Thank you for your time.

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