

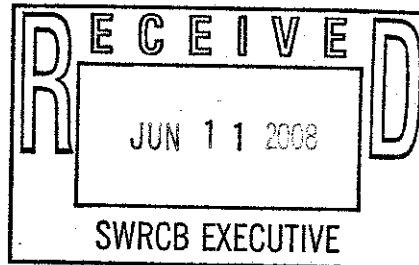


## State Center Community College District

1525 East Weldon Avenue • Fresno, California 93704-6398 • (559) 226-0720 • FAX 559-229-7039 • www.scccd.edu

June 11, 2008

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95812



Dear Ms. Townsend:

The State Center Community College District (SCCCD) thanks you for the opportunity to review and provide comments on the proposed Draft Storm Water Construction General Permit (Draft General Permit). While our District affirmatively supports clean storm water and receiving water protection, there are a number of provisions in the Draft Permit which have caused us some concern.

Unlike traditional developers, school districts follow a unique, elaborate, costly, and time-consuming funding, planning, design, and approval process for all new construction and reconstruction projects. Our projects must meet the approval of the Division of the State Architect. For projects currently in the review and approval process, the 100-day deadline for implementation of the Draft General Permit, simply stated, is not possible to meet.

Additionally, the imposition to redesign already designed projects would lead to lengthy construction delays and significant additional and unfunded expenditures. Our District alone has over \$100 million in near-term, planned construction. For projects currently in the approval process, the expense associated with project redesign to comply with the proposed post-construction controls, subsequent re-approval process and resulting construction delays would be significant (several hundred thousand dollars). Further, the additional funding necessary to comply with the Draft General Permit provisions is not eligible through the normal funding process and would, therefore, be diverted from classroom funds. At a time when the role of the community college has never been more important to our state, funding cuts to the education of our students represents an unreasonable fiscal burden that will result in a long-term, adverse, social impact.

### Recommendation

**SCCCD recommends that community colleges be granted an exemption for those projects already in the approval process.**

As presented above, school district construction projects receive multiple and overlapping review processes. While our District has no particular opposition to the Regional Board reviewing permit-related documents (SWPPPs, REAPs, etc.) a mandatory review period should be incorporated into the Draft General Permit in order to minimize potential construction project delays. Many construction funding sources have defined periods of funding authorization. Project delays due to undefined Regional Board review periods could threaten construction funding.

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**Recommendation**

**Limit Regional Board review periods of permit-related documents to no greater than 30 days. Permit-related documents will be granted approval upon the conclusion of the 30-day review period.**

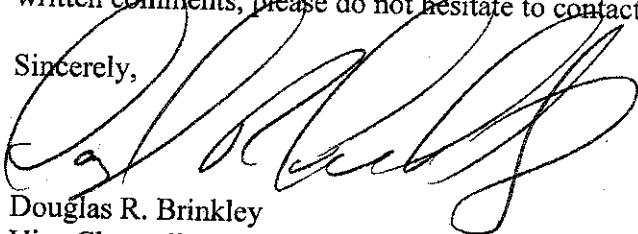
The State Center Community College District principally serves the central San Joaquin Valley. Our campuses and educational centers are located in topographically flat areas that generally do not drain to receiving waters. In fact, in order to prevent seasonal flooding, the primary method to provide for flood control in our region is to infiltrate urban and non-urban storm water runoff into large reservoirs and ponding basins. Within the Fresno area, the vast network of regional ponding basins owned and operated by the Fresno Metropolitan Flood Control District (a Phase I NPDES permittee) function equivalently as an area-wide, post-construction structural control. The imposition to design and construct post-construction runoff controls (Section H., 3 New Development and Redevelopment Storm Water Performance Standards) is an unnecessary redundancy in many areas of our District where urban runoff is comprehensively managed through watershed/drainage, area-wide structural controls.

**Recommendation**

**SCCCD recommends an exemption provision be added to Section H for areas where comprehensive storm water management controls provide equivalent protection to site-specific structural BMPs intended to comply with provision 3.**

The State Center Community College District appreciates your consideration of our concerns and proposed recommendations to the Draft General Permit. If you have any questions regarding our written comments, please do not hesitate to contact me.

Sincerely,



Douglas R. Brinkley  
Vice Chancellor  
Finance and Administration

DRB:pc

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