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Public Comment  
Draft Construction Permit  
Deadline: 6/11/08 by 12 p.m.

Board of Trustees

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Cathline Fort

David W. Long

Mark H. Murphy

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June 11, 2008

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

Dear Ms. Townsend:

The Draft Storm Water Construction General Permit (Draft Permit), proposed by the State Water Resources Control Board (SWRCB), will cause severe financial problems for the Etiwanda School District and will take away funds reserved to educate children in our schools. Additionally, the Draft Permit will result in the delay of the construction of needed classrooms if my district is required to incorporate new post-construction design requirements and implement new on-site monitoring and reporting processes.

OPSC has stated that expenses related to site monitoring, water sampling, action exceedance reporting, annual reporting, and redesign and reconstruction to meet new post-construction requirements are not eligible for funding under the current School Facility Program. The cost of compliance would come from diverting education funds from the classroom.

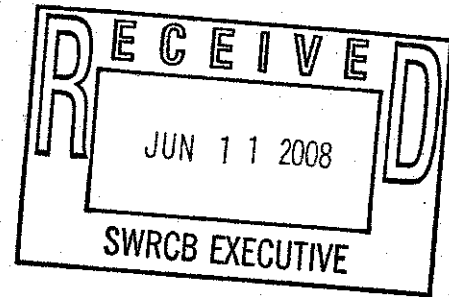
Our specific concerns are as follows:

- **Fiscal Impact**

Every dollar spent on storm water programs results in less available funding for our core programs. To continue to provide a quality education to our students, we would require some type of financial relief from this added mandate.

**We recommend that the SWRCB work with the State Allocation Board to provide financial relief to implement storm water permit programs.**

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



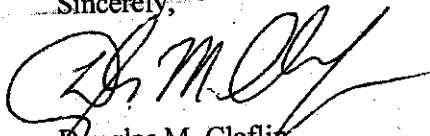
School district construction projects are already reviewed and approved by four different state agencies, (i.e., DSA, OPSC, CDE, and DTSC). By adding the regional boards to the review process, an already lengthy process will be further extended. **Our local city governments already review the plans for water quality issues.** 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 our local city governments review the plans for storm water compliance.

**We recommend that: (1) the storm water construction permit and plan review function be given to one of the existing state or local city 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.**

The Etiwanda School District requests that you consider our recommendations and respond to our concerns. Questions regarding this letter should be made to Douglas M. Clafin, 6061 East Ave, Etiwanda, CA 91739, [doug\\_clafin@etiwanda.k12.ca.us](mailto:doug_clafin@etiwanda.k12.ca.us), 909-803-3124.

Sincerely,



Douglas M. Clafin  
Assistant Superintendent of Business Services  
DMC/jc

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