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September 13, 2005

Tam M. Doduc, Chair
California State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Chair Doduc:

This letter is intended to provide the members of the State Water Resources Control Board (SWRCB) with the Coalition for Adequate School Housing's (C.A.S.H.) input on the Board's proposal to establish numeric effluent limits on the SWRCB's Storm Water Program.

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. C.A.S.H.'s membership is a coalition of public and private interests that believe school facilities are a critical component of effective schools. C.A.S.H. represents nearly 500 school districts serving 92 percent of public school children in California.

C.A.S.H. has appreciated the opportunity to work with the SWRCB on issues of concern to school districts and community colleges with regard to the inclusion of schools on the list of entities regulated under the SWRCB's Small MS4 General Permit. C.A.S.H. agrees that storm water pollution is an increasingly important issue, and supports the SWRCB's efforts to ensure a significant reduction of pollutants in the surface waters of California.

To help educate our members, the C.A.S.H. Board of Directors has established the C.A.S.H. Storm Water Committee, has conducted a series of workshops and trainings regarding storm water management issues for our members, has met with local governments to discuss multi-jurisdictional issues, and continues to inform our members concerning the most recent developments in storm water pollution mitigation.

C.A.S.H. has the following concerns about the SWRCB's proposal to establish numeric effluent limits as part of the Storm Water Program:

- How would baseline numeric effluent be established?
- Would numeric effluent limits be strictly applied? Would permit holders be allowed to present evidence on a case-by-case basis to recognize particular circumstance?

- How would multi-jurisdictional issues be addressed?
- How would the establishment of numeric effluent limits affect group-monitoring programs?
- Would school districts be allowed to self-test?
- What will be the scope of enforcement actions for a violation of the proposed numeric effluent limits?
- What will be the frequency, timing and location requirements of the sampling and monitoring associated with the establishment of numeric effluent limits?

Finally, for the reasons stated above, C.A.S.H. is concerned that the imposition of numeric effluent limits changes the rules midstream, thus creating significant difficulty for school districts that are currently complying with current Best Management Practices. In light of constrained school budgets, the costly and time-consuming sampling and analysis requirements will create an unnecessary hardship for these school districts. C.A.S.H. would like to work with the SWRCB to create a more workable solution.

Thank you for your consideration.

Sincerely,



Ian C. Padilla
Coalition for Adequate School Housing (C.A.S.H.)

CC: Peter Silva, Vice Chair, State Water Resources Control Board
Arthur G. Baggett, Jr., Board Member, State Water Resources Control Board
Richard Katz, Board Member, State Water Resources Control Board
Gerald Secundy, Board Member, State Water Resources Control Board
Celeste Cantú, Executive Director, State Water Resources Control Board