



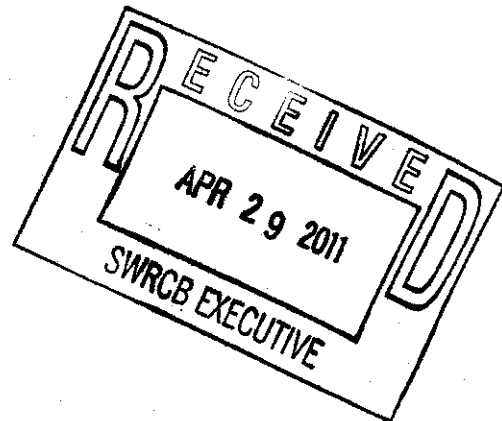
SAN MARCOS
UNIFIED SCHOOL DISTRICT
engaging students...inspiring futures

255 Pico Avenue, Suite 250
San Marcos, CA 92069

Public Comment
Draft IGP
Deadline: 4/29/11 by 12 noon
T 760.752.1299
F 760.471.4928
www.smusd.org

April 25, 2011

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 "I" Street, 22nd Floor
Sacramento, CA 95812



RE: Comment Letter – Draft Industrial General Permit

Dear Ms. Townsend:

This letter is to inform you that the San Marcos Unified School District ("District") is concerned about the negative impact that the Draft Industrial General Permit proposed by the State Water Resources Control Board ("SWRCB") would have on our District. Specifically, because the Permit would result in increased costs for our District but does not include funding to mitigate these costs, the Permit would put our District in the unenviable position of weighing water quality against educational programs. The following is a summary of our District's concerns.

Increased Costs

The cost of complying with the Permit is estimated to be \$29,400 per bus maintenance yard and could increase to over \$100,000 if numeric limits are exceeded and advanced treatment is required. Please note that at this time, K-12 education funding has been reduced by approximately 20%. Furthermore, the Governor's 2011-12 State Budget proposes to reduce per-pupil K-12 funding by \$2 billion or \$330 per student. Since the current temporary tax extensions will not be placed before the voters, the Legislative Analysts' Office ("LAO") has estimated that school funding may be reduced by approximately \$4.8 billion. As a consequence, our District may lose an additional \$800 per student and, therefore, simply cannot afford the new costs that the Draft Industrial General Permit would impose. Any new costs related to this program would diminish the educational program that we deliver to our students.

New Inspections Required

Schools are currently required to comply with numerous federal and state compliance requirements - the Draft Industrial General Permit would require a significant amount of new and revised inspections and record-keeping at a time when our District is dealing with significant reductions in staff and resources.

Numerics

Our District agrees with the California Water Quality Association's ("CASQA") analysis that the inclusion of Numeric Action Levels ("NAL") and Numeric Effluent Limits ("NEL") into the Permit is an incorrect adaptation of the United States Environmental Protection Agency's processes into a storm water permit.

Group Monitoring

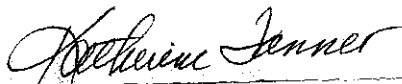
The Permit eliminates group monitoring. Third party group monitors are a vital source of information and expertise and provide training, monitoring schedules, review of compliance

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reports, and analysis of water samples - eliminating group monitoring would result in a loss of critical expertise and may result in diminished compliance.

In conclusion, the San Marcos Unified School District urges the SWRCB to consider our concerns related to diminishing the educational program due to permit related costs as you move toward adoption of the Draft Industrial General Permit. Questions regarding this letter should be made to Katherine Tanner.

Sincerely,



Katherine Tanner
Executive Director
Facilities Planning & Development

KT/ntd

C: Gary Hamels, Assistant Superintendent, Business Services
Charles R. Hoppin, Member, Chair, SWRCB
Frances Spivey-Weber, Member, Vice-Chair, SWRCB
Tam M. Ducoc, Member, SWRCB
Ian Padilla, Coalition for Adequate School Housing (C.A.S.H.)