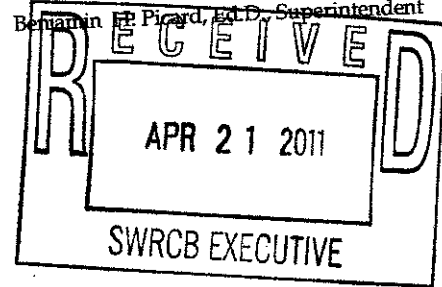




Sunnyvale School District

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(408) 522-8200 • FAX: (408) 522-8338

Benjamin F. Picard, Ed.D., Superintendent



April 18, 2011

Ms. 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 Sunnyvale School 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. K-12 education funding has been reduced by 20%. Furthermore, the Governor's 2011-12 State Budget proposes to reduce per-pupil K-12 funding by \$2 billion or \$330 per student. If current temporary tax extensions are not approved by the voters, the Legislative Analysts' Office (LAO) estimates that school funding could be reduced by an additional \$4.8 billion. As a consequence, our district simply cannot shoulder the new costs that the Draft Industrial General Permit would impose.

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 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.

Board of Education

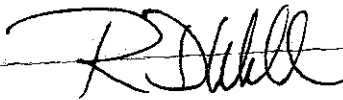
Sandy Agbayani • Jeffrey Arnett • Phyllis Fowler • Anita Herrmann • Nancy Newkirk

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

In conclusion, Sunnyvale School District urges the SWRCB to consider our concerns as you move toward adoption of the Draft Industrial General Permit. Questions regarding this letter should be made to Rob Williams, Chief Operations Officer.

Sincerely,



Rob Williams
Chief Operations Officer

cc: Mr. Charles R. Hoppin, Member, Chair, SWRCB
Ms. Frances Spivey-Weber, Member, Vice-Chair, SWRCB
Ms. Tam M. Ducoc, Member, SWRCB
Ian Padilla, Coalition for Adequate School Housing (C.A.S.H.)