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# County School Facilities Consortium 2018 Annual Summit

October 4-5, 2018  
The Westin Sacramento  
4800 Riverside Blvd  
Sacramento, CA

## **Stormwater Discussion**

*Steve Turner*  
CSFC Executive Committee  
Mendocino COE

*Ian Padilla*  
Legislative Advocate  
Coalition for Adequate School Housing

## Speaker Biography

Steve Turner

Director of Maintenance and Operations  
Mendocino County Office of Education

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Steve Turner is the Director of Maintenance and Operations at the Mendocino County Office of Education. He also serves on the County School Facilities Consortium Executive Committee.

## Speaker Biography

Ian Padilla

Legislative Advocate  
Coalition for Adequate School Housing

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Ian Padilla is currently a partner with the firm of Murdoch, Walrath & Holmes in Sacramento, which specializes in Governmental Relations and Association Management. He is also a Legislative Advocate for the Coalition for Adequate School Housing (CASH), which was formed in 1978 to advocate for funding to build, modernize and maintain K-12 public schools in California. He is a former legislative aide to Senator Richard G. Polanco, amending clerk for the Chief Clerk of the Assembly and research assistant for Ross Communications.

2018 CSFC Annual Summit  
The Westin Sacramento  
October 4, 2018  
2:00-2:45

State Water Board MS4 Permit: Implications for K-12 Schools

How Did We Get Here?

- Water Board Storm Water Permits:
  - Construction, Industrial, and Municipal
- Current MS4 Permit does not “designate” schools.
  - Schools not required to comply, but encouraged to comply with the Six Minimum Control Measures in preparation for schools being included in the next MS4 permit cycle.
- State Water Board is in the process of renewing the MS4 permit and schools will be included as anticipated – the question is, how?
  - What are the details of the regulatory scheme?
  - What will it cost and how will districts pay for it?
  - What resources are available to schools?
- For CSFC, are there issues or challenges that are particular to county offices of education?

Where Are We Now?

- Water Board ‘Soft Outreach’ – Workshops at County Office of Education
- SB 541 – Storm Water Management Guidance for Schools
  1. Approved in 2017, SB 541 requires the State Water Resources Control Board (SWRCB), Division of the State Architect (DSA), and the California Department of Education (CDE) to coordinate on creating Best Management Practices for schools.
  2. Draft *Guidance for CAPTURE at Schools: California Practices To Use Runoff Effectively*.
  3. CASH joint letter in response to *Guidance* document (see attached).
- Water Board staff in process of drafting the revised MS4 permit language – this is where the rubber will meet the road.
- Timeline for Implementation (see attached).

What Do We Know?

- Reports from COEs that held outreach workshops:
  1. Steve Turner, Mendocino County Office of Education
  2. Sherri Gruber, Kern County Superintendent of Schools
- DISCUSSION...

# State Water Board MS4 Permit: Implications for K-12 Schools

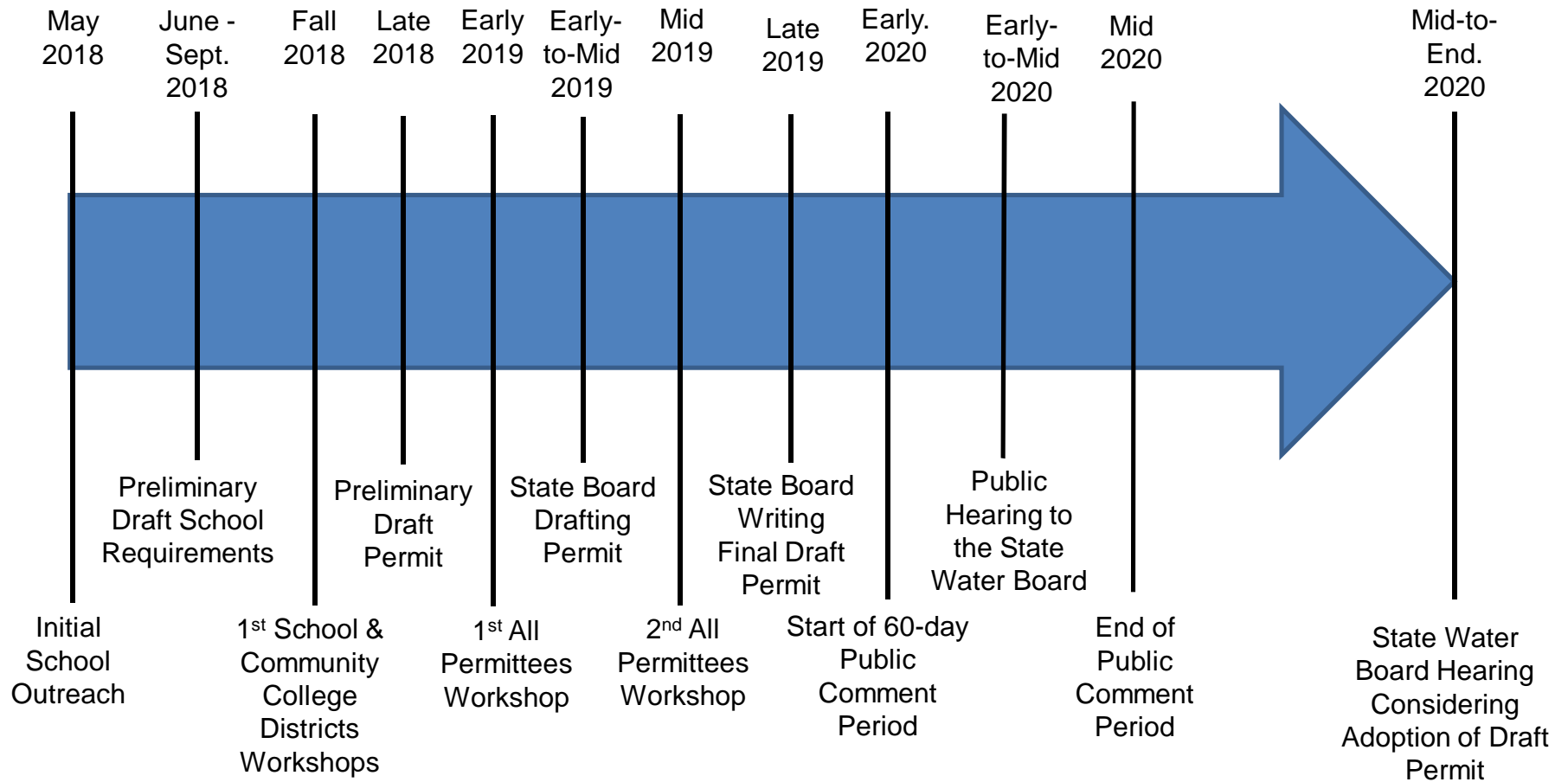
## Key Contacts

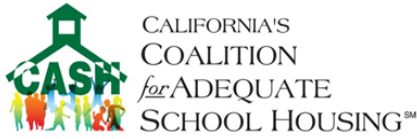
Bill Hereth  
State Water Resources Control Board (SWRCB)  
(916) 341-5497  
[bill.hereth@waterboards.ca.gov](mailto:bill.hereth@waterboards.ca.gov)

Rachael Keish  
California Storm Water Quality Association (CASQA)  
(408) 592-0223  
[rachael.keish@vta.org](mailto:rachael.keish@vta.org)

State Water Board Email Subscription  
[https://www.waterboards.ca.gov/resources/email\\_subscriptions/swrcb\\_subscribe.html](https://www.waterboards.ca.gov/resources/email_subscriptions/swrcb_subscribe.html)  
(Select "Storm Water Municipal Permitting Issues" under the Water Quality Section)

# Projected Timeline for Adoption Hearing





August 17, 2018

Mr. Jeffrey Albrecht, P.E.  
State Water Resources Control Board  
Division of Water Quality  
1001 I Street, 15<sup>th</sup> Floor  
Sacramento, CA 95814

Dear Mr. Albrecht:

The education organizations listed above appreciate the opportunity to provide comments and recommendations on the draft *Guidance for CAPTURE at Schools: California Practices to Use Runoff Effectively*. We expect the guidebook will be a reference document for school districts, particularly with the new Municipal Storm Water Permit (MS4) anticipated to go into effect in 2020. Our goal is to provide you with recommended improvements to ensure that the guidebook is a useful and practical reference for school districts to manage their own storm water runoff.

SB 541 (Chapter 811, Statutes of 2017), requires the Water Board and the Division of the State Architect (DSA) to develop, "...best design and use practices for storm water and dry weather runoff capture practices that can be applied to all new, reconstructed, or altered public schools, including school grounds."

#### Summary of Comments and Recommendations

##### *Clarify Guidebook's Primary Purpose and Audience*

We recommend that a paragraph be added to the Introduction identifying whom this document is intended for as a reference guide. We recommend the following language: "*This document is not intended for an engineer. It is not intended as a governing document, but only as a guide to open discussions and identifying best management practices as school districts assist with keeping California's storm water clean and well-managed. Items related to sizing and engineering are gathered from best practice and included as a point of reference.*" We also recommend that the Introduction include information about who developed the guidebook, what it is responding to, and its primary purpose.

*Include Provision to Allow for Updates*

The guidebook should include information, resources, and practices to reflect lessons learned from school districts' implementation processes, new regulatory requirements, and use of new technology. The Guidebook should be open to updates, particularly if it is referenced in future

permits as a guide, to allow stakeholders to have input at that time. Inclusion of a formal "refresh" provision would ensure that the guidebook continues to be a current and practical resource for school districts as intended.

*Match Tone and Organization to Intended Audience*

Be mindful of your audience with regard to language and organization – school district facility and maintenance departments. We understand this is a complex and technical issue and will also be a resource for the design and engineering community. Nevertheless, we believe efforts to ensure the guidebook is easily accessible to school district facility and a maintenance department is key to its success. In particular, efforts to minimize technical language will make the document more accessible. One organizational approach could be to, where possible, place more technical and design/engineering aspect references of the guidebook in a separate section or towards the back as appendices.

*Include "Tear Out" Section to Assist School Facility Practitioners*

Primary design considerations and guidance developed with the input of district management, facility, and maintenance staff at the site level is the core information that school districts will be looking for. One approach would be to design sections such as "MAINTAINING RUNOFF CAPTURE PRACTICES TO EXTEND BENEFITS", as stand- alone 'tear out' section for use by school facility and maintenance practitioners in the field.

*General Concerns – Guidebook Relation to MS4/Cost Implications*

More broadly, we are concerned about the details of how the guidebook will be used in relation to the new MS4 permit. Our understanding from the text of the bill is that it is intended to develop recommendations to assist school districts, and not direct the design or minimum requirements of any given project; that is, guidance documents to assist school districts comply with the revised MS4. In addition, there will be cost implications, significant in many cases, for school districts because of the requirement to comply with the MS4 permit - we urge you to keep this in mind.

In closing, we appreciate the opportunity to provide input on what will become a key reference guide for schools in their efforts to reduce storm water pollution, particularly as the State Water

Board continues its effort to update the MS4. Our organizations are available to further assist you as you complete the guidebook, so please do not hesitate to contact us.

Sincerely,



Ian Padilla, Legislative Advocate  
Coalition for Adequate School Housing



Rebekah Cearley, Legislative Advocate  
County School Facilities Consortium



Laura Preston, Legislative Advocate  
Association of California School Administrators



Sara Bachez, Assistant Executive Director, Government Relations  
California Association of School Business Officials

cc: Sophia Kwong Kim, Consultant, Assembly Education Committee  
Ian Johnson, Consultant, Senate Education Committee  
Chester A. Widom, California State Architect  
Juan Mireles, California Department of Education  
Fred Yeager, California Department of Education  
Bill Dos Santos, San Diego County Office of Education  
Joanne Branch, San Diego County Office of Education  
Steve Turner, Mendocino County Office of Education  
Rachael Keish, California Stormwater Quality Association  
Bill Hereith, California Water Board





## RRWA Programs

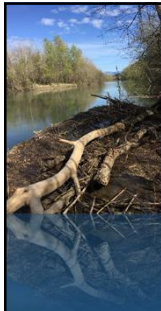
- Creek Week/Pollution Prevention Week
- Urban Creek Care Guide
- Safe Medicine Disposal Program
- Russian River-Friendly Landscape Guidelines
- Grant Funding
- Storm Water Resource Plan



## RRWA Programs

Current Municipal Permit Compliance Support

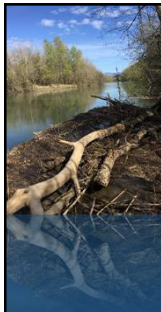
- Trash Reduction/Anti-Litter Campaign
- Outreach
  - Student Outreach
  - Spanish Outreach
  - Monthly Environmental Articles
  - Social Media and Website
  - High School Video Contest
  - Events
- Low Impact Development Training
- Regional Water Quality Program Development



## RRWA Programs

### Storm Water Resource Plan Collaborators

- Eleven Member Agency Municipalities
- North Coast Regional Water Quality Control Board
- Mendocino County Resource Conservation District
- Sonoma Resource Conservation District
- Gold Ridge Resource Conservation District
- Mendocino County Russian River Flood Control & Water Conservation Improvement District
- National Oceanic and Atmospheric Administration (NOAA)
- Lawrence Berkeley National Laboratory
- Sonoma County Permit & Resource Management Department
- Sonoma County Regional Parks
- Sonoma County Agricultural Preservation and Open Space District (SCAPOS)
- Sonoma Land Trust
- Laguna de Santa Rosa Foundation
- Pepperwood Preserve
- San Francisco Estuary Institute (SFEI)



## Russian River Confluence

- **Vision:** A Russian River watershed that is healthy, vibrant, accessible and is the economic, environmental, recreational and spiritual heart of the region.
- **Mission:** Driving community action towards a healthy, resilient and regenerative Russian River watershed.
- **“Tag line”:** Hearts, Minds and Hands of the Russian River community
- New Confluence Partnerships