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# County School Facilities Consortium 2019 Annual Summit

September 18-19, 2019  
The Westin Sacramento  
4800 Riverside Blvd  
Sacramento, CA

## **Stormwater Issues and MS4 Permit**

*Ian Padilla*  
Legislative Advocate  
Coalition for Adequate School Housing

*Rachael Keish*  
CEO  
Keish Environmental

## Speaker Biographies

### 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.

### Rachael Keish, CEO Keish Environmental

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Rachael has over 18 years of experience in civil engineering, specializing in stormwater and environmental compliance. She has water resources expertise with an emphasis on Storm Water Pollution Prevention Program planning, implementation and inspection. Rachael is one of 126 CASQA qualified Trainers of Record in the state on the CGP, and one of the 171 Trainers in the IGP. She brings extensive experience with municipal NPDES permits as well, focused on Phase 2 MS4 permittees. Rachael leads the state-wide CASQA Non-Traditional working group so that permitted agencies can collaborate on creative ways to meet permit requirements. She is well versed in CGP, IGP, and MS4 NPDES permit requirements including BMP installation and inspection, training, pH and turbidity sampling, pollutant source assessment, SMARTS data entry, and Annual Reporting.

Rachael's recent assignments include implementation of the VTA's MS4 stormwater program, assistance with IGP coverage under the new 2015 requirements, and preparation of all Utility Vault Dewatering permit documentation. She also serves a pivotal role in the BART Silicon Valley Berryessa Extension Design-Build construction project, responsible for review and approval of construction submittals, regulatory agency interaction, and monitoring and reporting of field environmental compliance with Mitigation Monitoring and Reporting Programs, including 401 RWQCB, 404 Corps. and CDFW LSAA permit compliance. Rachael performed SWPPP oversight prior to training and transitioning this work successfully to VTA staff in October 2015.

# How Will the MS4 Permit Effect County Offices of Education?

Ian Padilla

Coalition for Adequate School Housing

Rachael Keish

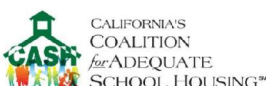
CASQA Non-Traditional Phase II Subcommittee



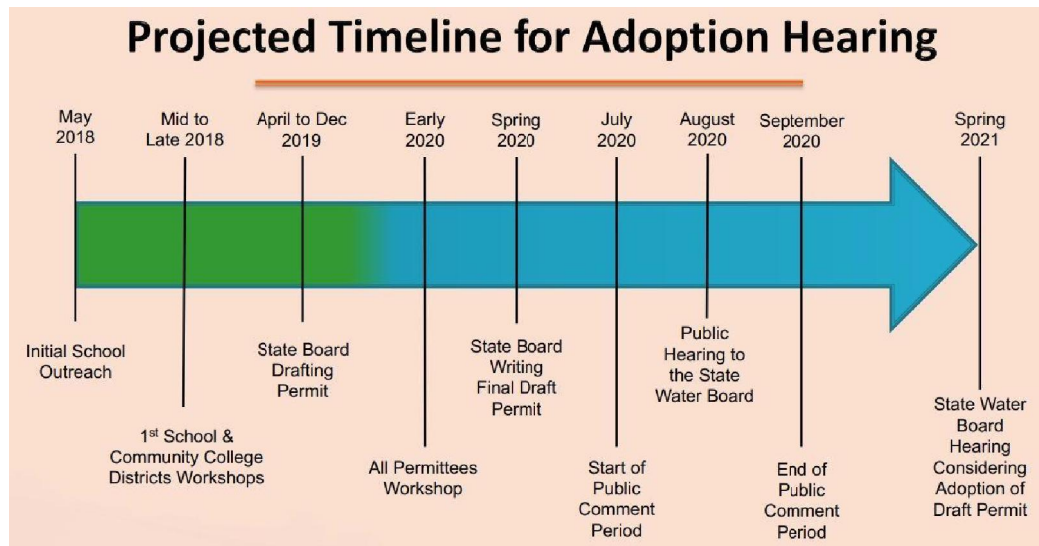
CSFC Annual Summit  
September 19, 2019

## What is the Status of the MS4 Reauthorization?

- MS4 permit is currently being rewritten
- State Water Board staff engaging with stakeholders
- CASH and CASQA working to educate school districts
- County office of education roles:
  - » Key role in permit compliance
  - » Outreach workshops
  - » Centralized leadership



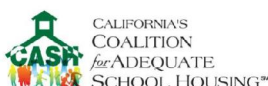
# Projected Timeline for MS4 Permit Adoption



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## MS4 Permit: What We Know

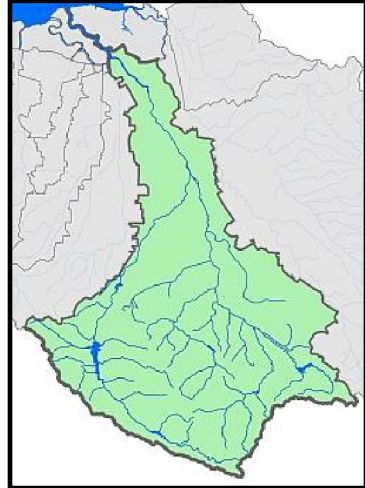
- No draft language available yet, but new permit will include schools for the first time.
- New permittees:
  - » 300-400 community college districts
  - » 700-800 K-12 school districts
- MS4 permit also incorporates:
  - » Statewide Trash Amendments or "Full Trash Capture"
  - » Urban Pesticide Amendments



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# MS4 Permit: Water Board's Objectives

- Currently, K-12 schools are “holes” in the existing MS4 permit coverage
- Water Board's Primary Objectives K-14 Schools Under the MS4:
  - » Minimum BMPs
  - » Coordinate with existing MS4 programs for regional consistency
  - » Participate in watershed level projects for synergistic benefits



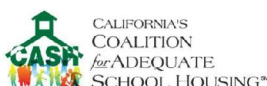
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## MS4 Permit: What WILL NOT be Included

- No fees for school districts in cities/counties already paying a fee
- Five-year phase-in methodology
  - » Not all requirements are active in the first year...but in the real world there is very likely a compounding effect
- No requirement to allocate classroom time for storm water education
  - » Recognition Operations vs. Capital dynamic
- Will not require extensive sampling
  - » Much will be visual
- No retroactive requirement

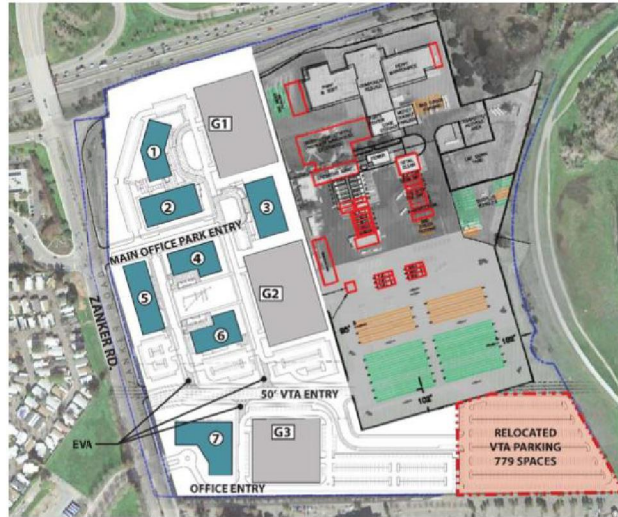


"Just sign here - yes, in blood."



# MS4 Permit: What WILL be Included

- Create map of storm water discharge drainage on school property
- Identify areas on campus that could generate storm water pollution



# MS4 Permit: What WILL be Included

- Train staff on best management practices for storm water management
- Make information of school storm water program available on public website
- Label drain inlets

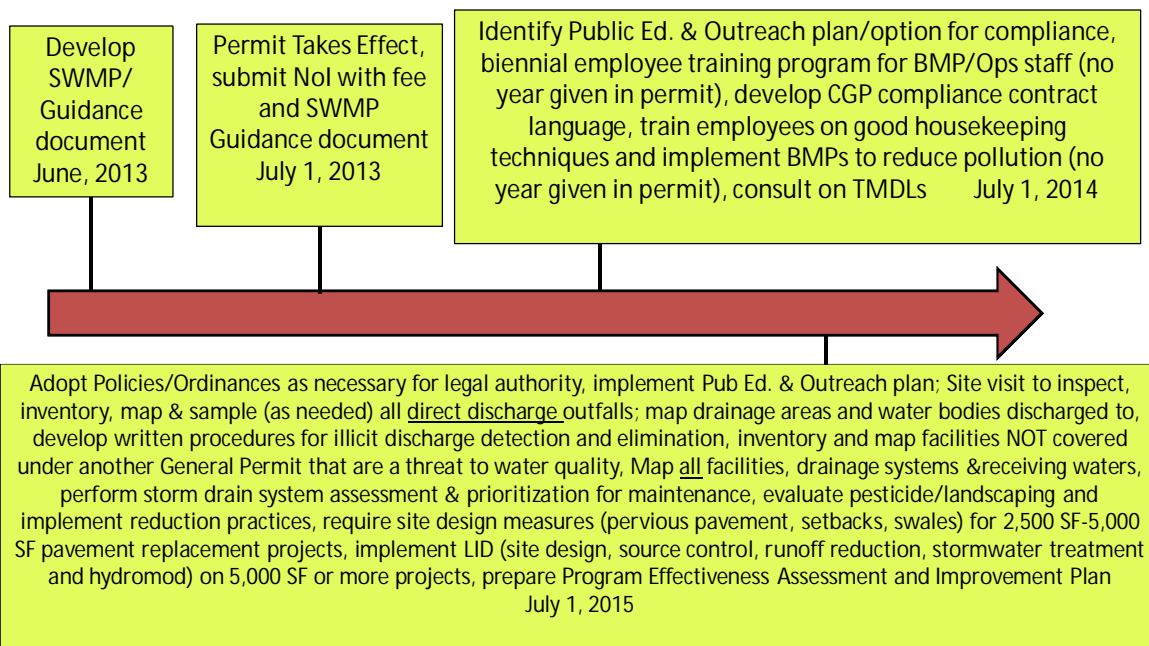


# MS4 Permit: What WILL be Included

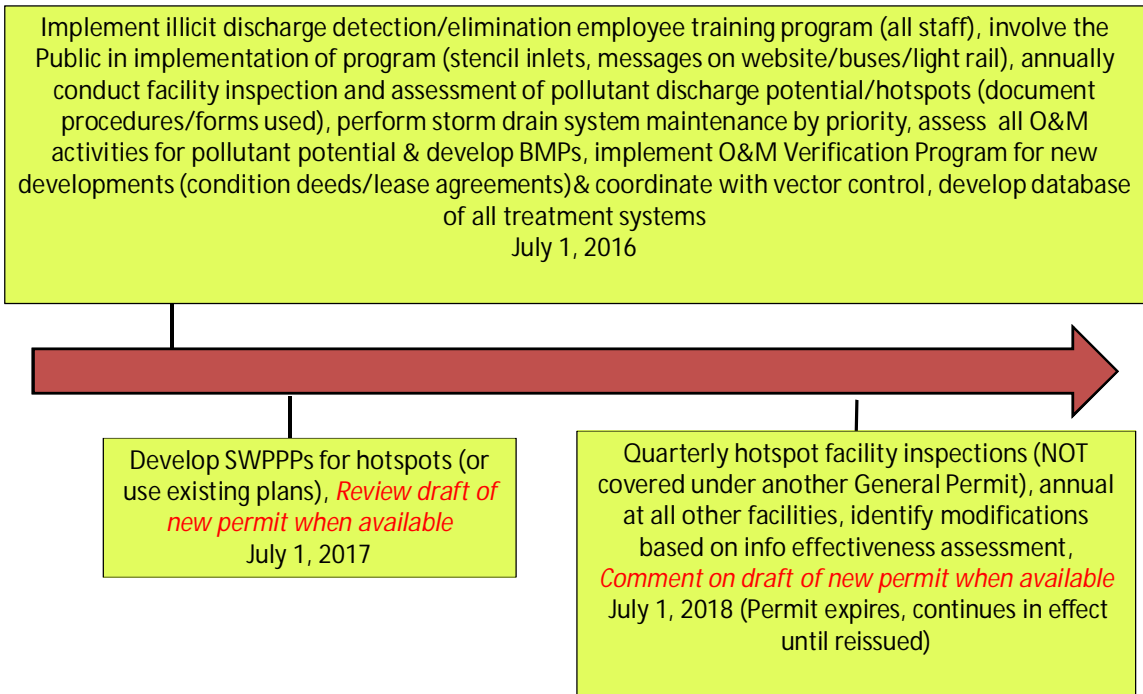
- Construction: Ensure all projects follow the Construction General Permit
- Post-construction: New and redevelopment must meet requirements for storm water runoff quality
- Document all activities and report annually



## Small Phase 2 MS4 Non-Traditional Requirements From Last Permit



## Small Phase 2 MS4 – Non-Traditional Requirements From Last Permit

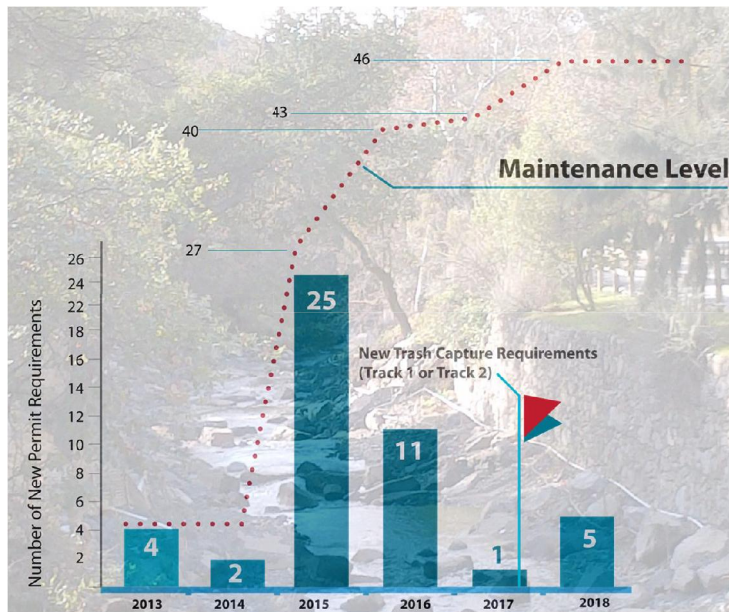


## Digging Deeper: Practitioners Perspective

- Municipalities and Non-Traditionals like CSU campuses have been complying with the MS4 for over a decade
  - » Are there lessons for K-14 schools?
- San Diego County Office of Education Municipal Storm Water Group is *\*voluntarily\** complying and has been for years!
  - » Are there lessons for K-14 schools and county offices in particular?



## Small Phase 2 MS4 – Non-Traditional Requirements From Last Permit



## Digging Deeper: Practitioners Perspective

- Existing programs
  - » Phase 1 and Phase 2's are great resources
  - » Don't reinvent the wheel!
- CA Stormwater Quality Association (CASQA)
  - » See Handout
  - » Stormwater practitioners, municipalities, consultants and regulators come together
  - » Statewide, calls among the regulated to discuss Non-Trad and school-specific issues and comments
  - » Resources
    - BMP manuals
    - School data sharing from San Diego

# Discussion

What are the implications of the MS4 permit for county offices of education?



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# Contact Information

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Coalition for Adequate School Housing (CASH)

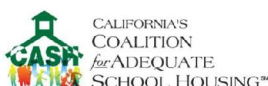
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