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# County School Facilities Consortium Summit

September 24 & 25, 2012 – Sacramento, CA  
Embassy Suites

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

Update on the Municipal Storm Water Permit:

What Are the Implications for County Offices of Education?

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# Brief Overview of Water Board Permits

- › State Water Resources Control Board (SWRCB)
- › Nine Regional Water Quality Control Boards (RWQCB)
- › Construction, Industrial and Municipal General Permits
- › Reissued every five-years
- › Under SWRCB permits schools are seen as “non-traditional” municipal entities
- › Schools first proposed to be regulated under Municipal permit in 2002

# Municipal General Storm Water Permit (MS4)

- › Under current MS4 schools are not “designated”
- › School required to follow Best Management Practices (BMP) and complete Storm Water Pollution Prevention Plan (SWPPP)
- › The revised permit proposed much more stringent requirements
- › Schools subject to the new requirements under the first iteration of the permit

# School Community Advocacy Effort

- › C.A.S.H. Storm Water Subcommittee
- › Los Angeles County of Education
- › San Diego County Office of Education



# School Argument

- › MS4 cannot afford new state requirements
- › MS4 poses unique challenges for compliance as new construction and modernization project must gain approval from multiple state agencies
- › MS4 adds COST and COMPLEXITY to school building and modernization projects
- › Worked extensively with SWRCB staff to address concerns

# How Are Schools Treated Under Proposed MS4?

- › Schools are “not-designated” under the permit
- › Schools are still subject to regional board authority and can designate schools on a case-by-case basis
- › Not an “exemption” for schools

# County Offices of Education

- › COEs were not initially included in the school non-designation permit language
- › Worked with SWRCB staff and determined the omission was a technical oversight
- › *The non-designation language now includes COEs*



# What's Next?

- › Legislation
- › Implementation
- › Jurisdictional issues: Battle moves to local level
- › Building capacity for the next permit cycle
- › Role of County Office of Education
- › Industrial permit

# Questions?

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