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Public Comment
Draft Phase II Small MS4 General Permit
Deadline: 7/23/12 by 12 noon

July 18, 2012

Jeanie Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



RE: Comment Letter – 2nd Draft Phase II Small MS4 General Permit.

Dear Ms. Townsend:

On behalf of the California County Superintendent’s Educational Services Association (CCSESA), I am writing to offer the following comments on the proposed draft General Permit for Storm Water Discharges from Small MS4s (revised draft Tentative Order) released for public comment on May 1, 2012.

CCSESA commends the Board for recognizing California’s Permittee diversity and for recognizing that one set of prescriptive requirements would not work for our state.

We appreciate that the proposal recognizes County Offices of Education as eligible for the non-traditional MS4s category, along with charter schools and school districts.

County Offices of Education are an integral part of California’s school system. In fact, the California Education Code 12000 defines “school districts” as school districts, County Offices of Education, and other educational agencies pursuant to state and federal law. Education Code 12000 is used by regulatory agencies to treat County Offices of Education like school districts.

In addition, CCSESA respectfully requests the inclusion of “County Offices of Education” in the language of the Storm Water Discharges from Small Municipal Separate Storm Sewer Systems Order where “school districts” are referenced to avoid confusion and/or misinterpretation.

We note that the revised draft order excludes school districts and community colleges under the section: “Entities Subject to this Order, Section C.” Our request is for the order to add County Offices of Education to the list of agencies explicitly excluded.

Thank you for your consideration to these comments.

Sincerely,

Sandra S. Morales, Legislative Advocate