



**ORANGE COUNTY  
DEPARTMENT  
OF EDUCATION**  
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**WILLIAM M. HABERMEHL**  
County Superintendent  
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Deputy Superintendent

JOHN L. NELSON  
Associate Superintendent

September 8, 2011

Via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95812



**Comments Regarding the Proposed Draft Small Municipal Separate Storm Sewer System (Small MS4) Storm Water General Permit**

Dear Ms. Townsend:

The Orange County Department of Education (OCDE) would like to thank the State Water Resources Control Board (SWRCB) for their decision not to automatically designate K-12 school districts and charter schools in the draft Small MS4 Storm Water General Permit.

OCDE is strongly committed to the protection of the natural environment and the highest possible water quality. We believe that this is an area where all stakeholders must work together to make certain that our environment is protected for our use both now and in the future.

107.1

→ To correct what we believe is a technical oversight, OCDE requests that the permit language be amended to clarify that county offices of education, like school districts and charter schools, are not automatically designated and are treated the same as school districts and charter schools for the purposes of the permit.

**ORANGE COUNTY  
BOARD OF EDUCATION**

JOHN W. BEDELL, PH.D.

107.2

DAVID L. BOYD

→ Because the Small MS4 permit is written for implementation by a county or city agency, it is not easily adaptable to school district governance. The requirements to create the legal authority and certify to its implementation and enforcement would necessitate the creation of an additional layer of administration and trained

ELIZABETH PARKER

LONG PHAM, PH.D.

KEN L. WILLIAMS, D.O.

staff for which there is no funding. Every dollar spent to implement the Small MS4 permit takes away a dollar from programs to educate children.

107.3 → We appreciate the fact that the Board staff have worked diligently with school districts and county offices to develop a draft permit that serves the public as well as school districts in these difficult times. We look forward to the opportunity to provide additional feedback in the future to assist in the development of permit requirements that are applicable to the unique nature of K-12 school districts, charter schools and county offices of education.

Thank you again for your consideration of our concerns. Please call me at (714) 966-4325 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrea Sullivan", with a stylized flourish at the end.

Andrea Sullivan, Director  
Facilities Planning and M&O

cc: Mr. Charles R. Hoppin, Chair, SWRCB  
Ms. Frances Spivy-Weber, Vice Chair, SWRCB  
Ms. Tam M. Doduc, Member, SWRCB  
Mr. Roger Chang, Los Angeles County Office of Education