



The draft fact sheet on page 16, VI. Application Requirements, states that:

“For fee purposes, in determining the total population served by the MS4, both resident and commuter populations are to be included. For example, publicly operated school complexes including universities and colleges, the total population served would include the sum of the average annual student enrollment plus staff.”

Please note that community colleges measure student enrollment in many different ways because our students attend our colleges for many different reasons. For example, many of our students attend only one class per semester and may only be on campus for only one hour 3 days per week. The same can be said for staff because community colleges have many part time staff. Then some students and staff have full course loads and may be on campus 6-8 hours per day 5 days per week. For these reasons, I recommend that the SWRCB consider defining total population using the following example:

59.1

“For example, publicly operated school complexes including universities and colleges, the total population served would include the sum of the average annual Full-Time Equivalent student enrollment plus Full-Time Equivalent staff.”

These full-time equivalent measures are measures that community colleges must calculate and submit to the state in official reports. Changing the example would allow community colleges to use the most common measure of student attendance, and would allow for consistent reporting to multiple agencies using the same measure.

Respectfully submitted.

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