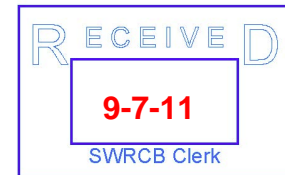


VENTURA COUNTY OFFICE OF EDUCATION

Stanley C. Mantooth, County Superintendent of Schools

September 7, 2011

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



RE: Comments on the Proposed Draft Small Municipal Separate Storm Sewer System (Small MS4) Storm Water General Permit

Dear Ms. Townsend:

The Ventura County Office of Education 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.

The education community has experienced significant reductions in state funding over the past four years, and if state revenues do not materialize as projected, schools will have to deal with mid-year 2011-12 budget reductions. Preliminary cost estimates indicate that the cost of compliance with the MS4 for schools would be \$5,000 to \$10,000 per school site in the first year of implementation, and \$30,000 to \$50,000 for centralized district activities. Schools simply cannot bear these additional costs.

County Offices of Education

To correct what we believe is a technical oversight, the Ventura County Office of Education 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 so are treated the same as school districts and charter schools for the purposes of the permit.

County offices of education are an integral part of California's school system, are funded from Proposition 98 funds like school districts, and are subject to funding reductions like school districts. County offices of education also serve critical student populations such as special education students and juvenile offenders. We join with other educational entities in urging the SWRCB to include the following language in the permit where school districts and charter schools are currently referenced:

"K-12 school districts, county offices of education and charter schools"

In conclusion, the Ventura County Office of Education would like to once again express its appreciation for the SWRCB's recognition of our difficult fiscal situation by not automatically designating schools. We look forward to working with the SWRCB on issues of water quality in educational environments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ken Prosser', written in a cursive style.

Ken Prosser
Associate Superintendent
Fiscal and Administrative Services

Cc: Mr. Charles R. Hoppin, Chair, SWRCB
Ms. Frances Spivy-Weber, Member, SWRCB
Ms. Tam M. Doduc, Member, SWRCB
Ian Padilla, Coalition for Adequate School Housing (C.A.S.H.)