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SANTA BARBARA • SANTA CRUZ

OFFICE OF THE EXECUTIVE VICE PRESIDENT—
CHIEF FINANCIAL OFFICER

OFFICE OF THE PRESIDENT
1111 Franklin Street, 10th Floor
Oakland, California 94607-5200

OFFICE OF RISK SERVICES

August 4, 2014



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

Dear Clerk Townsend:

Proposed Trash Amendments (Statewide Water Quality Control Plans)

These comments on the Proposed Trash Amendments are submitted on behalf of the ten campuses comprising the University of California system (hereafter, the University). The University would like to acknowledge its appreciation to the State Water Resources Control Board (SWRCB) for the opportunity to comment on the proposed amendments. The University is encouraged by the SWRCB stakeholder engagement in the adoption process, but is somewhat concerned about the limited extent of outreach to Phase II Non-Traditional MS4 Permittees such as the University.

The University shares and supports the SWRCB's goals to maintain clean, trash-free waterways and fully appreciates the importance of having a consistent statewide approach to controlling trash discharges while focusing limited resources on high trash generating areas as highlighted by the list of "priority land uses." Our campuses are typically institutional park-like settings with land uses consisting primarily of buildings related to teaching and research, with ancillary uses including residence halls, sports/recreation facilities, administrative offices, and so forth. As such, our campuses do not have a significant number of facilities that could be considered "priority land uses" such as industrial, commercial, or public transportation stations. In our prior discussions with SWRCB staff (Christine Sotelo, March 2013), the University was rightfully told it would not be automatically captured by the proposed trash amendments due to its "educational" land use designation, reflecting the primary land uses of our campuses as noted above.

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Indeed, this sensible finding to treat campuses individually on a case-by-case basis dependent on the amount of trash generated is included in the proposed regulations under Section L.2.d. which states:

d. A permitting authority* may determine that specific land uses or locations (e.g., parks, stadia, schools, *campuses*, or roads leading to landfills) generate substantial amounts of Trash*. In the event that the permitting authority* makes that determination, the permitting authority* may require the MS4* to comply with Chapter III.L.2.a. or Chapter III.L.2.b. (as the case may be) with respect to such land uses or locations.

The University appreciates the SWRCB's flexibility in determining applicability of the proposed amendments to our campuses on a case-by-case basis as needed to focus limited resources on significant concerns related to littering and trash generation. The University prides itself on the beauty of our campuses and maintaining trash-free campus grounds to the extent practicable is an important aspect not only of our campus image, but our commitment to protect aquatic life and public health beneficial uses of state waters. This year, the University adopted a new "smoke-free" campus policy at all locations, that not only promotes wellness, but should also serve to eliminate or greatly reduce discarded cigarette butts that could be transported by stormwater into receiving waters.

It should also be noted that the University also fully supports and endorses the comments made on the proposed amendments by our colleagues from both the County of San Diego and the California Stormwater Quality Association (CASQA).

The University respectfully requests that the State Water Board consider the comments provided in this letter. If you have any questions, please feel free to contact me at Robert.Charbonneau@ucop.edu or 510.987.9594.

Thank you very much for your consideration and the opportunity to comment on the draft amendments.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Charbonneau", with a long horizontal flourish extending to the right.

Robert Charbonneau
Director – Environmental Services
University of California
Office of the President