



California Regional Water Quality Control Board

Central Coast Region



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February 25, 2005

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COMMENTS – NOTICE OF PREPARATION, 2005 LONG-RANGE DEVELOPMENT PLAN, UNIVERSITY OF CALIFORNIA SANTA CRUZ, SCH# 2005012113

Mr. Barnes and Mr. Fitch:

Central Coast Regional Water Quality Control Board (Regional Board) staff received the University of California Santa Cruz (University) 2005 Long-Range Development Plan (LRDP) Notice of Preparation on February 1, 2005.

Regional Board staff reviewed the Notice of Preparation and has the following comments:

1. **New Development** – Regional Board staff is concerned about storm water pollutants (such as sediment, oil, grease, metals, pesticides, and herbicides), erosion and sediment discharges during construction, and impervious surfaces and resultant increases in storm water runoff. Additionally, Regional Board staff understands University runoff quantity and associated erosion is currently a problem for neighboring communities and the City of Santa Cruz. The Draft Environmental Impact Report should acknowledge existing drainage problems, address how growth will affect them, and identify means of responsible storm water management.

Regional Board staff prefers to see the University take an active approach in managing pollutants and runoff by considering these issues in the planning and design phases of new development projects. When possible, mitigation should be incorporated into new developments through their design. For example, low impact development designs can improve water quality and runoff management, and can also create/enhance wildlife habitat, be aesthetically pleasing, and require less maintenance and cost less than conventional developments. For additional information regarding low impact development, please contact Jennifer Bitting at (805) 549-3334.

Regarding relevant water quality requirements, please consider the Regional Board's Anti-Degradation Policy (from the *Central Coast Water Quality Control Plan, 1994*), which states:

“Wherever the existing quality of water is better than the quality of water established herein as objectives, such existing quality shall be maintained unless otherwise provided

California Environmental Protection Act



Item No. 5 Attachment No. 2
May 12-13, 2005 Meeting
UCSC Status Report

by the provisions of the State Water Resources Control Board Resolution No 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California," including any revisions thereto."

Proposed use of sinkholes and swallow holes for storm water management must demonstrate that receiving-water quality will not be degraded as a result of the discharge.

2. Mitigation Funding – After reviewing parts of the 2004 Mitigation Monitoring Program Report (for the 1988 LRDP), Regional Board staff is concerned about the University's history of failure to comply with mitigation requirements due to 'lack of funding'. Regional Board staff does not want to see this problem repeated for the 2005 LRDP's prescribed mitigation. Please address how the University will ensure mitigation will be a priority and receive adequate funding.
3. Monitoring – If water quality monitoring is to be used as a mitigation measure or to determine compliance with a mitigation measure (as for the previous LRDP), Regional Board staff would like an opportunity to review the water quality monitoring and reporting program and submit comments before it is finalized.
4. Creek Alterations – Page 13 of the 2005 LRDP Environmental Checklist discusses "Storm Water Drainage Improvements." Consider avoiding use of concrete, rocks, gabions, etc. in bank stabilization projects. These hard materials can increase water velocity, cause significant erosion problems downstream, and adversely impact aquatic habitat. ('Softer' bank stabilization methods include erosion control blankets, permanent native seeding, willow wattles, live staking, fiber rolls, etc.) Any work in a riparian zone or creek will require Water Quality Certification from this office. For additional information regarding Water Quality Certification, please contact Chris Adair at (805) 549-3761.

Regional Board staff looks forward to reviewing the Draft Environmental Impact Report. If you have questions regarding this matter, please call Kimberly Gonzalez at (805) 549-3150.

Sincerely,



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Roger W. Briggs
Executive Officer

Encl:

cc: State Clearinghouse Office of Planning and Research, P.O. Box 3044, Sacramento, CA 95812-3044

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File: CEQA: Santa Cruz County, University of Santa Cruz 2005 Long-Range Development Plan
Task: Storm Water

California Environmental Protection Agency



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