



OFFICE OF THE PRESIDENT

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June 15, 2011

The Honorable Martin Garrick
Member of the Assembly
State Capitol, Room 2158
Sacramento, CA 95814

Re: AB 1210 (Garrick), as amended May 19, 2011
Position: Oppose

Dear Assembly Member Garrick:

Regretfully, I am writing to inform you that the University of California (UC) is opposed to AB 1210. This bill would require all civil engineering activities performed in the preparation of stormwater pollution prevention plans (SWPPPs) to be performed under the responsible charge of a licensed civil engineer.

We object to AB 1210 because the bill would require UC campuses to utilize licensed civil engineers to perform work on SWPPPs that is currently adequately performed by other professionals at a lower cost. The State Water Resources Control Board has already developed procedures for ensuring that certified “Qualified SWPPP Developers” (QSDs) and “Qualified SWPPP Practitioners” (QSPs) perform the tasks that AB 1210 is concerned with. These professionals are usually environmental engineers, geologists, or other professionals who possess appropriate qualifications, even if they are not licensed as *civil* engineers.

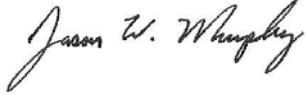
There are two types of stormwater permits that UC campuses are required to obtain: the first is a permit for stormwater discharges associated with construction projects over one acre in size; the second is an industrial stormwater permit where the campus performs certain activities with runoff impacts, e.g. vehicle maintenance or operation of a landfill. For construction projects, UC generally relies on contractors to perform the SWPPP tasks. For industrial permits, the work may be done by the campus itself.

In both cases, UC relies on QSDs and QSPs to prepare SWPPPs, consistent with the policy of the State Water Resources Control Board. If AB 1210 were to become law, however, UC would have to retain the services of licensed civil engineers – either under contract or through new staff hires – at additional cost. We can identify no benefit that would result from this additional expenditure, particularly during a period of great fiscal constraint for the University, and must therefore oppose this bill.

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Should you have questions about the University's position on AB 1210, please do not hesitate to contact me at (916) 445-9924.

Sincerely,

A handwritten signature in cursive script that reads "Jason W. Murphy".

Jason Murphy
Legislative Director

cc: President Mark G. Yudof
Provost Lawrence Pitts
Executive Vice President Nathan Brostrom
Senior Vice President Daniel M. Dooley
Associate Vice President and Director Steve Juarez