

# **Appendix B**

## **BMPs Not Selected**



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MEP: Maximum Extent Practicable. In discussing the MEP standard, the State Board has said the following: "There must be a serious attempt to comply, and practical solutions may not be lightly rejected. If, from the list of BMPs, a permittee chooses only a few of the least expensive methods, it is likely that MEP has not been met. On the other hand, if a permittee employs all applicable BMPs except those where it can show that they are not technically feasible in the locality, or whose cost would exceed any benefit to be derived, it would have met the standard. MEP requires permittees to choose effective BMPs, and to reject applicable BMPs only where other effective BMPs will serve the same purpose, the BMPs would not be technically feasible, or the cost would be prohibitive."

### **Non-Selected BMPs for Public Education**

#### **Forming partnerships (EPA Fact Sheet):**

Operators of regulated small MS4s are encouraged to enter into partnerships with other governmental entities rather than having numerous operators developing their own local solutions. Because UCSC is very different from traditional MS4s, our BMP strategies are fundamentally different from adjoining MS4s. UCSC will informally work with, share with and whenever feasible align its efforts with the local cities and county. The cost of this BMP would exceed benefit.

#### **Recreational guides (EPA Fact Sheet):**

EPA encourages regulators of small MS4s to use educational materials and strategies relevant to local situations and issues. In this case, the activities and materials would be relevant to educating groups such as golfers, hikers, paddlers, climbers, fishermen and campers. UCSC is not considered a recreational area. This BMP is not applicable to UCSC.

#### **Alternative information sources (EPA Fact Sheet):**

EPA encourages regulators of small MS4s to incorporate a variety of education strategies to ensure maximum coverage. In this case, bumper stickers, refrigerator magnets, restaurant placemats and the like would be used to reach this goal. Costs will exceed benefit and selected BMPs serve similar purposes; expect excellent outreach using electronic means.

#### **Volunteer educators (EPA Fact Sheet):**

EPA encourages regulators of small MS4s to use educational materials and strategies relevant to local situations and issues. If a UCSC student intern is interested conducting storm water education, this may become the focus of their internship. However, volunteers and interns may be used for other projects. Other selected BMPs will involve the UCSC public and provide for education relevant to local situations and issues.

**Educational programs for school aged children (EPA Fact Sheet):**

Not applicable as children are not a significant part of UCSC "public" and the children of the UCSC "public" are widely dispersed.

**Economic incentives (EPA Fact Sheet):**

The EPA encourages small MS4s to develop economic incentives to citizens and businesses (e.g., rebates to homeowners purchasing mulching lawnmowers or biodegradable lawn products). This BMP is not applicable because UCSC staff performs all grounds and facility maintenance within the MS4. However, UCSC plans to pursue grant funding which may provide some incentive for affected departments.

**Tributary signage (EPA Fact Sheet):**

The EPA points out that tributary signage can serve as an avenue to increase public awareness of local water resources. UCSC web based information about campus drainage will provide the same information. This BMP may be explored further in later SWMPs.

**Multiple language materials (EPA Fact Sheet):**

Printing posters and brochures in more than one language or posting large warning signs are methods that can be used to reach audiences less likely to read standard materials. The UCSC public is predominantly English speaking. However, UCSC expects to implement this BMP on a limited basis. BMP #6 Electronic Brochures and Flyers: Food Service Facilities and BMP #7 Electronic Brochures and Flyers: Custodial Services may be translated into additional languages. For all other purposes it is expected that the cost would exceed benefit.

**Postal Service distribution of materials (EPA Storm Water Education Materials):**

The EPA encourages small MS4s to use a mail delivery system and bulk mailing in order to reach target audiences with educational material. Within the UCSC community, this cost would exceed benefit. Staff, students and faculty can be reached more effectively and with less environmental impact electronically.

**Door to door (EPA Storm Water Education Materials):**

Door to door canvassing can be very effective but also very resource intensive. The cost to implement this BMP would exceed the benefit. The UCSC audience is very web connected. Staff, students and faculty can be reached more effectively electronically.

**Non-Selected BMPs for Public Participation****Volunteer monitoring (EPA Fact Sheet):**

UCSC already monitors representative main campus storm water runoff. However, student interns may choose to pursue a photo-monitoring of natural drainages of similar endeavor.

**Adopt-a-stream programs (EPA Fact Sheet):**

Adopt-A-Stream are volunteer programs in which participants "adopt" a stream, creek, or river to study, clean up, monitor, protect, and restore. Through these activities, the adopting group or organization becomes the primary caretaker of that stretch of stream in the watershed. Physical Plant Grounds Dept. currently keeps a close eye on campus drainages, providing clean-up, monitoring, protection and restoration as needed. Oversight and administration of a volunteer program would cost more than the benefit derived.

**Non-Selected BMPs for Illicit discharge****Legal Prohibition and Enforcement (EPA Fact Sheet):**

UCSC has a different organizational structure and has identified a BMP that will contractually require outside services and contractors to abstain from making illicit discharges. This and other adopted BMPs serve the same purpose.

**Non-Selected BMPs for Construction sites:**

EPA Menu of BMPs: As applicable to a particular construction site UCSC utilizes the entire spectrum of BMPs for runoff control, erosion control, sediment control, and good housekeeping. UCSC standards and construction contract requirements fulfill the same purpose as the model ordinance: "by guiding, regulating, and controlling the design, construction, use, and maintenance of any development or other activity that disturbs or breaks the topsoil or results in the movement of earth on land." They also ensure compliance through campus construction site inspectors and by providing for stop work orders and bonding requirements.

**Non-Selected BMPs for New Development Design Requirements:**

EPA Menu of BMPs: As applicable to a particular development UCSC utilizes or will utilize the entire spectrum of structural and non-structural BMPs except for alum injection and an ordinance. The cost of Alum injection would exceed any expected benefit. Selected new development BMPs and other considerations explained in section 4.2.5 serve the same purpose as an ordinance.

**Non Selected BMPs for Pollution Prevention for Operations and Maintenance****Septic System Controls (EPA Menu of BMPs):**

Septic system source control refers to the use of outreach programs to educate homeowners about the proper operation and maintenance of their septic systems to reduce the likelihood of failure.

Septic Systems are generally not used for wastewater treatment at UCSC facilities. This BMP does not apply to the UCSC facilities.

**Road Salt Application and Storage (EPA Menu of BMPs):**

The application and storage of deicing materials, most commonly salts such as sodium chloride, can lead to water quality problems for surrounding areas. This practice is applicable only to areas that receive snowfall in winter months and require deicing materials. UCSC is located in a temperate climate. Road salt application and any BMPs dealing with snowfall are not applicable.