



February 10, 2025

Gurgagn Chand  
State Water Resources Control Board  
Division of Water Quality  
1001 I Street, 15th Floor  
Sacramento, CA 95814  
(sent via e-mail to Gurgagn.Chand@waterboards.ca.gov)

**Subject: NPDES Residual Aquatic Pesticide Discharges Permit Notice of Intent and Supporting Documents for Stanford University**

Dear Gurgagn Chand,

Stanford University (Stanford) herewith submits the enclosed Notice of Intent for coverage under the State Water Resources Control Board Water Quality Order No. 2013-0002-DWQ, Statewide National Pollutant Discharge Elimination System (NPDES) Permit for Residual Aquatic Pesticide Discharges to Waters of the United States from Algae and Aquatic Weed Control Applications, General Permit No. CAG990005 (Permit). Components of the application include the Notice of Intent (NOI), the Aquatic Pesticides Application Plan (APAP) and the appropriate fee.

At this time, the only planned area for algae treatment is Felt Lake. Felt Lake is an artificial, off-stream reservoir that was initially constructed in 1878 and purchased by Stanford in 1887. The current Felt dam was constructed in 1929. Felt Lake is supplied water primarily from Los Trancos Creek through an artificially constructed conveyance flume that flows only when Stanford actively diverts water. Additional sources of water are pumped diversions from San Francisquito Creek and other local supplies. The water in Felt Lake is not discharged through the dam but is instead conveyed to a non-potable water distribution system via gravity and used primarily for irrigation on the Stanford campus. Felt Lake is not currently used, and has not been used in the past, for interstate or foreign commerce, is not subject to the ebb and flow of the tide, and is not an interstate water. Felt Lake is not a tributary of or to Los Trancos Creek and does not have a continuous surface connection to Los Trancos Creek.

Stanford has been working with the United States Army Corps of Engineers (USACE) to assess the status of multiple areas of the Stanford campus and what should be considered a water of the United States as part of its Searsville Restoration Project, including Felt Lake. However, no final jurisdictional determination has been reached. Stanford does not concede that Felt Lake is a Water of the United States by submission of this NOI for coverage under the NPDES permit. The submission of this NOI is out of an abundance of caution following consultation with staff from the San Francisco Regional Water Quality Control Board.

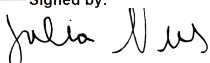
The following table includes the role and contact information for pollution prevention team members that participate in the permit activities for the Permit.

Role	Name and Title	Contact Information	Responsibilities
Legally Responsible Person	Jack Cleary, Associate Vice President, Land, Buildings, and Real Estate	jcleary3@stanford.edu (650) 245-3164	<ul style="list-style-type: none"> <li>• Owner/operator</li> <li>• Supervises department engaged in permitting</li> </ul>
Program Manager and Duly Authorized Representative	Julia Nussbaum, Associate Director, Water Planning & Stewardship	juliann@stanford.edu (650) 223-9930	<ul style="list-style-type: none"> <li>• Signs and certifies permit application</li> <li>• Provides technical support for implementation of the APAP</li> <li>• Develops training program</li> <li>• Provides review and assessment of APAP implementation, pollutant assessment, procedures, BMPs, and monitoring results</li> <li>• Coordinates required reports and plan updates</li> <li>• Liaison with regulatory agencies</li> </ul>
Operations Team Leader	Richard Souza, Associate Director, Water System Operations	souzar@stanford.edu (650) 723-1300	<ul style="list-style-type: none"> <li>• Supervises APAP activities</li> <li>• Directs employees/contractors in implementation of APAP</li> <li>• Manages necessary monitoring, recordkeeping, training, and updates</li> <li>• Trains team members</li> </ul>

I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

If you have any questions, please contact me via phone at (650) 223-9930 or via e-mail at juliann@stanford.edu.

Sincerely,

Signed by:  
  
E4A6C7669A204AE...

Julia Nussbaum, PE  
 Associate Director- Water Planning & Stewardship  
 Sustainability, Utilities & Infrastructure  
 Stanford University

DocuSigned by:  
  
60AAC3D6F039450...

Jack Cleary  
 Associate Vice President  
 Academic Projects and Operations  
 Land, Buildings & Real Estate  
 Stanford University

Enclosures: Application Package – Notice of Intent, APAP, and Fee Payment (check)

cc: Tom Zigterman (sent via email to twz@stanford.edu)  
 Richard Souza (sent via email to souzar@stanford.edu)  
 Alessandra Moyer, RWQCB-R2 (sent via email to alessandra.moyer@waterboards.ca.gov)