



June 25, 2014

Association for the Advancement of Sustainability in Higher Education
1536 Wynkoop St., Suite 100
Denver CO 80202
Remittance Address: PO Box 824583, Philadelphia, PA 19182-4583

RE: Letter of Affirmation for Western Michigan University Reporting for the
Sustainability Tracking, Assessment, and Reporting System (STARS)

To Whom It May Concern

The stormwater management approach embraced by Western Michigan University (WMU) in Kalamazoo, Michigan, provides a model for how a robust, quantitative approach can be applied to cost-effectively reduce stormwater pollutant loads. A TMDL issued in 2001 required the university to reduce its total phosphorus (TP) load in stormwater runoff by 50 percent. WMU documented compliance in 2011 and was the first MS4 in the 1,600-square-mile watershed to do so. To date, WMU has reduced its phosphorus loading by 92 percent, well beyond the TMDL requirement, despite limited available funding. The university intends to continue reducing its TP load until the campus becomes "Stormwater Neutral," meaning there will be a "net-zero" phosphorus load from the 807-acre stormwater footprint.

WMU was successful at reducing its phosphorus load and meeting the TMDL requirement in large part because the university applied quantitative assessments and prioritized cost-effective practices. The university also applied stormwater "offsets" to increase flexibility for meeting its Stormwater Neutral goal. These offsets were voluntary phosphorus load reductions generated by WMU-funded stormwater treatment practices outside the MS4 footprint but within the same drainage area. A more natural flow regime in the receiving stream, Arcadia Creek, not only protects WMU property and infrastructure, but it also protects other property and infrastructure of WMU downstream neighbors in downtown Kalamazoo.

Kieser & Associates, LLC (K&A) is an environmental consulting firm in Kalamazoo, Michigan. Having assisted WMU with quantifying their stormwater load reductions, we are pleased to provide this letter of support for your consideration.

Sincerely,
KIESER & ASSOCIATES, LLC

A handwritten signature in black ink that reads "Brian Boyer". The signature is written in a cursive style.

Brian Boyer, P.E.
Environmental Engineering Mgr.