



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-0306

September 13, 2012

Via Email

Rolland D. Jurgens
Chief Accounting Officer
UnionBanCal Corporation
400 California Street
San Francisco, CA 94104-1302

Re: Union BanCal Corporation
Form 10-K for Fiscal Year Ended
December 31, 2011
Filed March 26, 2012
Form 10-Q for Fiscal Quarter Ended
March 31, 2011
Filed May 14, 2012
File No. 001-15081

Dear Mr. Jurgens:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Sharon Blume

Sharon Blume
Assistant Chief Accountant