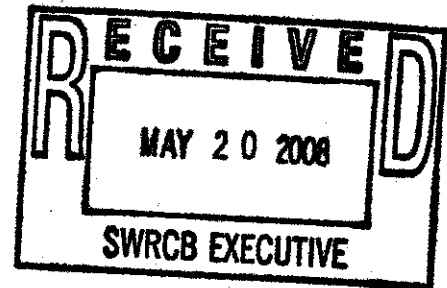


James Witty
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May 20, 2008

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



RE: Draft General Permit for Discharges of Storm Water Associated with Construction Activities (Draft Construction Permit).

Ms. Townsend:

This letter is intended to address some comments in response to the Draft Construction Permit. Specifically, I have concerns regarding what qualifications are necessary to be considered a "Qualified SWPPP Developer/Practitioner" (Section IX A and B). I agree that "Qualified" personnel should be a minimum of Certified Professionals, especially where the State does not have a registry and/or licensing program in specific disciplines.


However, it appears that the Draft Permit does not recognize a group of certified professionals, Certified Professional Soil Scientists, who are highly qualified to be both SWPPP Developers and Practitioners.

The Soil Science Society of America is responsible for certifying professional soil scientists through the ARCPACS (Association for the Registration and Certification of Professionals in Agronomy, Crops and Soils) program. Certified professional status requires a minimum of a B.S. degree in soil science or closely related field, three to five years of work experience in the field of soil science depending on education, and passing both the Fundamentals of Soil Science and Professional Practice Exams. Professionals are required to adhere to a Code of Ethics and acquire continuing education units (CEU) to maintain their status. This program has developed State licensing programs for soil scientists in Maine, Minnesota, North Carolina, and Wisconsin.

The practice of erosion and sediment control was largely developed through the study of soil science. Further, the detailed knowledge of soil properties, soil formation processes, and geomorphology required to be a professional soil scientist as well as knowledge of best management practices (BMPs) and soil conservation plans provides the soil scientist with the ability to take a holistic approach to sediment and erosion control on specific project areas.

I would like the State Water Resources Control Board to please consider adding Certified Professional Soil Scientists to the list of Qualified SWWP Developers/Practitioners. Feel free to contact me with any questions or to discuss this matter further. If there is some specific reason why the Board feels that Certified Professional Soil Scientists are not qualified, please document the reason(s) for the public to know. For specific information on the certification requirements and program, please contact Laurie Karr (lkarr@agronomy.org) 608-268-4954.

Respectfully,


James Witty