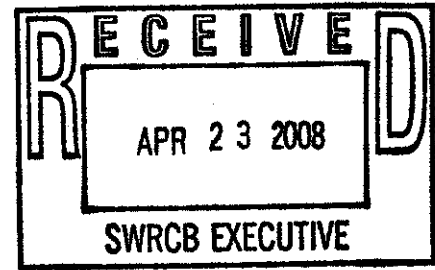


April 23, 2008

State Water Resources Control Board  
Attn: Jeanine Townsend, Clerk to the Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, Ca., 95814



Re: Comment Letter – Draft Construction Permit

Esteemed Colleagues,

In reviewing the latest draft version of the Construction General Permit, Section IX, 'Stormwater Pollution Prevention Plan (SWPPP)', the text lists qualified SWPPP developers and practitioners as being registered civil engineers, registered engineering geologists, registered landscape architects, hydrologists, and certified professionals and inspectors in erosion/sediment control and/or stormwater quality. However, this list should also include Registered Environmental Assessors (REAs). REAs are competent environmental compliance experts that are registered by Cal EPA's Department of Toxic Substances Control (DTSC) per Title 22 (CCR 22) Section 69201. REAs are required to have, at a minimum, a college degree in biological or physical sciences, engineering, or law, and current practical field experience in one or more facets of environmental protection. The REA program (<http://www.dtsc.ca.gov/REA>) was originally created to certify experienced and educated professionals to help businesses in the industrial arena comply with environmental standards, laws, and regulations. However, these skills are readily transferable and applicable to other arenas such as construction sites. The REA program relies on DTSC's evaluation of the experience and credentials of each applicant, including verification that he or she is qualified to conduct environmental assessments. Currently, the REA program has more than 3,200 registrants in California. Please consider this request to include REAs on the list of qualified SWPPP developers and practitioners. I may be contacted at 951-956-9976 if you require verification of the information presented above or additional information. Thank You.

Best Regards,

Aldo Licitra, REA # 06495

Associate Engineer and NPDES Program Manager, City of Temecula