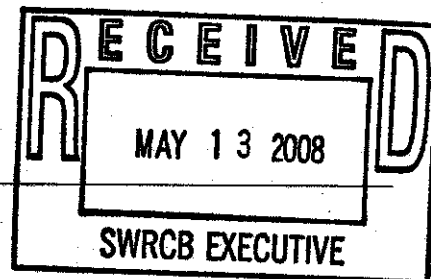


commentletters - CSI - Storm Water Inspectors

From: "Lund, Bruce" <blund@parks.ca.gov>
To: <commentletters@waterboards.ca.gov>
Date: Tuesday, May 13, 2008 2:19:39 PM
Subject: CSI - Storm Water Inspectors
CC: <John@npdes.com>



Dear fellow Californians & Board Members

I have been involved with sediment and erosions control, hazmat, and storm water planning and inspections for going on 15 years, or more, within the California Department of Parks & Recreation. I have been involved on industrial and general development sites, abandoned mine lands and formerly used defense sites (FUDS). I have worked as staff support on co-operative projects involving the Navy and the US Army Corps of Engineers, the Regional Boards and the DTSC. I have been a member of site evaluation teams or working solely on sediment and erosion issues, run-off and run-on issues, development of effective BMPs and other control measures. I prepare engineering field reports and permit reports and monitor sites with active CWA permits of one kind or another.

Although the project environments mentioned above do not always involve SWPPPs, they are certainly important to the overall goals of clean water and storm water management. I map and trace natural stream systems and tributaries and I account for and monitor conveyances and other points sources and the by-products of their outfalls. In other words I look at the contextual impacts of poor or illicit storm water discharges or management. I consider my greatest strength to be being "independent". Most of the staff and managers who have tasked me with site work have been please and well informed by my field work. The level of field work I do is based on the fact that I am not necessarily tied to a plan or project.

Maintaining a certified cadre of qualified independent inspectors is one of the assets that California has. I have long been an advocate of calling in an independent voice and view when all the parties have reached logger-heads. By not recognizing the CSI program as certified by the National Stormwater Center, this becomes much more difficult. Although other bodies can certify "practitioners", where are the plan independent inspectors supposed to come from?

Lastly, I suggest that you'll consider adding the ability to call for independent inspection as a pre-enforcement action for projects that look to be coming off the rails. It would give you one more tool in the storm water compliance arsenal before you land on the site operator. Maybe an independent inspection can be used to coach the parties to get their processes back on track and avoid the need for direct enforcement action? If not, it will give your folks additional cover from watchdog lawsuits and the like.

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