

commentletters - Comment Letter - Draft Construction PermitPublic Comment
Draft Construction Permit
Deadline: 6/11/08 by 12 p.m.

From: Luther Smith <lsmith@agronomy.org>
To: "commentletters@waterboards.ca.gov" <commentletters@waterboards.ca.gov>
Date: Monday, June 02, 2008 9:51:10 AM
Subject: Comment Letter - Draft Construction Permit
CC: "jimbrauski@excite.com" <jimbrauski@excite.com>, Ellen Bergfeld
 <ebergfeld@agronomy.org>, Frances Katz <fkatz@agronomy.org>

Jeanine Townsend, Clerk of the Board
 State Water Resources Control Board

We would like to make a suggested addition to Section IX. Storm Water Pollution Prevention Plan (SWPPP), A. SWPPP Preparation, Implementation and Oversight, 1. Qualified Developer on behalf of the Certified Professional Soil Scientists/Classifiers (CPSS/C) of the Soil Science Society of America (SSSA).

Soil is a primary feature that must be considered and evaluated when developing an appropriate SWPPP. Without the soil components, the SWPPP is destined for failure. Our suggested recommendation is to list CPSS/C as one of the required certifications that must be held by a qualified SWPPP developer.

Suggested language:

3. A Certified Professional Soil Scientist/Classifier as certified by the Soil Science Society of America.

Each CPSS/C must pass two comprehensive exams, have at least 5 years of experience with a minimum of a Bachelor of Science degree in soil science. They must earn 40 hours of continuing education in soil science related topics every two-years to maintain their certification and they signed the code of ethics.

I can provide more details about the CPSS/C programs and SSSA at your discretion or you can find related background materials on the web site: www.soils.org/certifications

Please contact if more information is required and I thank you for considering our recommendation.

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