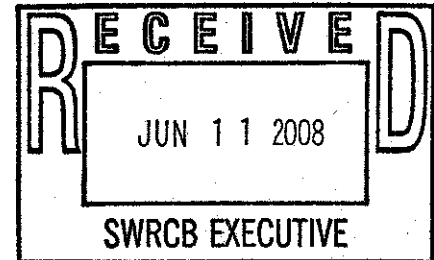




June 11, 2008

Ms. Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
Division of Water Quality  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

RE: Draft California Construction General Permit Comments



Dear Ms. Townsend:

Thank you for the opportunity to provide comments on the preliminary Draft of the California Construction General Permit (draft permit). WGR Southwest, Inc. (WGR) is an environmental consulting company which is actively involved in construction projects relating to storm water compliance. WGR currently provides consulting services to municipalities in the areas of SWPPP compliance, construction site inspections for SWPPP compliance and preparing Development Standards Plans. WGR has also written construction SWPPPs for residential subdivisions, linear projects, road construction projects, a hospital, schools, biodiesel plant, oil companies and car dealerships to name a few. We understand there are many challenges to revising a document which will satisfy the majority of the people, companies and entities involved. Below are WGR Southwest, Inc. comments on "Qualified SWPPP Developer" certification.

WGR's understanding of the draft permit is that qualifications for a "Qualified SWPPP Developer" are divided into two categories. The first category consists of professionals registered in several fields and are immediately certified, while the second category, consisting of certified professionals which must have multiple years of experience prior to certification. Both of these categories are certified as a "Qualified SWPPP Developer" based upon these distinct criteria. WGR does not believe both categories are equally qualified or trained for this highly specialized task.

Individuals in the registered professional category, have some of the training needed as part of their education in their respective fields to be a "Qualified SWPPP Developer" however most do not have specialized training related to storm water pollution prevention Best Management Practices (BMPs). WGR has observed examples of this lack of experience with BMPs by individuals that would qualify in the registered professional category. These examples have been observed while reviewing construction SWPPPs to verify compliance to California Construction General Permit for a Central California municipality. Many of the SWPPPs were written by professionals licensed in the State of California, working in offices located in other states. WGR has observed that many of the SWPPPs produced by these out of state professionals are not in compliance with the requirements of the current California Construction General Permit. When reviewing these SWPPPs for compliance, it is frequently evident that the site has never been visited by the professional writing the SWPPP. BMPs recommended for the site are often inadequate or not site appropriate.

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The certified professional's category is typically field people who visit the sites, inspect the sites, and make recommendations for BMPs. These professionals must pass a specialized exam for storm water as it pertains to construction sites. To qualify to take the exam, these professionals are required to have construction storm water related field experience. The concept of field specific training and taking a specialized exam is good but this should be required by all qualified SWPPP developers.

In summary WGR believes the draft of the permit has a double standard for a "Qualified SWPPP Developer". All professionals whether registered or certified should be required to go through specialized training for this field of expertise. The draft does address training however this is effective two years after the adoption date of the General Permit. This training and passing a written exam should be required prior to being given the title of a "Qualified SWPPP Developer". Protecting a site, pertaining to storm water concerns, should be put in the hands of professionals that have been specifically trained and their knowledge verified by examination. A title behind a name is not enough to assure that the person has been appropriately trained for this highly specialized field.

Sincerely,  
**WGR Southwest, Inc.**

*Steve Brumm*

Steve Brumm  
Project Manager