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



Dear Ms. Townsend:

I write regarding the role specific permit requirements delegated to Qualified Industrial Stormwater Professionals (QISP) as proposed in the Draft Industrial General Permit and the qualifications and training required fulfilling these requirements. By way of background I am an Environmental Engineer and one of over 10,000 Registered Environmental Managers. As more fully described below, REMs are uniquely qualified through an exhaustive review and testing process to fulfill the obligations and requirements of QISPs and as such I believe that a REM should be accorded the same recognition as a licensed professional civil engineer, registered geologist, or certified engineering geologist and be recognized as a QISP I, II, or III without further testing or training.

The REM certification is granted by the National Registry of Environmental Professionals (NREP). NREP's mission is to professionally and legally enhancing the recognition of those individuals who possess the education, training, and experience as qualified environmental engineers, technologists, managers, technicians, and scientists into a into a single, viable source so that the public at large, the government, insurers, and employers can easily confirm the qualifications and expertise of its registrants.

The draft GIP removes the conditional exception for light industry. State board staff estimates that there will be in the range of 30,000 registrants under the new permit. A review of the effected SIC codes as applied to facilities in California tend to indicate that this number may be very conservative. REMs have the demonstrated skills and training to act as QISPs. Unlike geologists and engineers, REMs are highly qualified environmental professionals who have demonstrated their knowledge concerning water quality and environmental management through education, experience and comprehensive testing. Moreover, given the number of regulated facilities, it is not likely that there will be enough qualified geologists and engineers available to serve the regulated community while the State Board is developing and implementing the QISP training program. This imbalance in supply and demand is likely to result in sky rocketing costs for regulated facilities, which could be ameliorated by the State Board's recognition of REMs as QISPs.

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In light of the likely demand for QISPs and the proven qualifications of REMs, I request that the State Water Resources Control Board grant REMs the same status as licensed professional engineers, registered geologists and certified engineering geologist.

Sincerely,

Randy Bowers, REM, LEED AP BD+C
Civil and Environmental Technologies, LLC