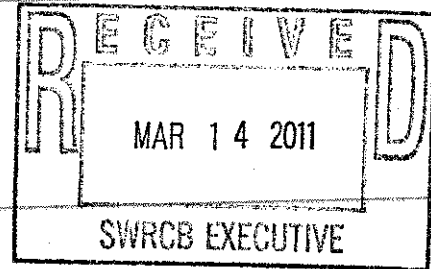


commentletters - Comment Letter - Draft Industrial General Permit

From: Sam Polly <spolly@streamlineplanning.net>
To: <commentletters@waterboards.ca.gov>
Date: Monday, March 14, 2011 12:06 PM
Subject: Comment Letter - Draft Industrial General Permit



Dear Waterboard Clerk,

Last year I spent a tremendous amount of time and money applying, studying and testing to become a CPESC (Certified Professional in Erosion and Sediment Control). After that, I repeated the process to become a QSD/P so I could write SWPPPs under California's Construction General Permit. All of this expenditure came at a time when we are feeling the economic squeeze and construction jobs have greatly diminished.

Last week I found out that the Waterboard's New Draft Industrial General Permit only allows civil engineers, geologists, hydrologists and landscape architects to become QSD/Ps. If this permit passes, I'm basically out of business, since nearly all of my work has been industrial. There's no way I can go back to school for an engineering degree. CPESCs and CPSWQs have plenty of training and experience to continue writing SWPPPs for industrial sites. The amount of training I underwent to become a CPESC, combined with my soil science degree and stormwater-related work experience makes me plenty qualified to write SWPPPs for industrial sites. Additionally, most of our work has been with rock quarries, where sediment is the major pollutant. It is absurd that I would no longer be able to write SWPPPs for these sites. Even our biodiesel client has only sodium hydroxide, waste vegetable oil and methanol. This client is a far cry from the massive scrap metal or refinery sites in large, urban areas. BMPs are BMPs regardless of whether the designation is construction or industrial. The Waterboard's one-size-fits-all approach is simply an unfair, unnecessary, rigid regulation that ignores the social and economic implications, while providing little additional environmental benefit.

I understand the Waterboard's concern for ensuring good data and maximum environmental protection. However, any increased complexity in the permit will likely improve water quality protection, as compared with the old permit. Just the requirement of obtaining QSD/P status will ensure all consultants are on the same page. The current draft's prejudice toward certain certifications and engineers will not achieve this improvement in protection, but it will hurt many of us in an ailing economy. I am asking that the Waterboard take action on behalf of all certified stormwater professionals to combat this poor regulatory approach before it becomes law.

Sincerely,

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