



California Council of Geoscience Organizations

An Advocate For The Profession
In The Public Interest

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September 20, 2004

Re: AB 885

State Water Resources Control Board
1001 I Street, 17th Floor
Sacramento, CA 95814
Attn: Mr. James Giannopoulos
Assistant Division Chief, Ground Water Branch

Dear Mr. Giannopoulos,

ORGANIZATIONAL MEMBERS

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I am the President of the California Council of Geoscience (CCGO, www.ccco.org), a California Registered Geologist, and an Environmental Scientist at Lawrence Livermore National Laboratory. I am writing to you to express CCGO's concern regarding the revision of the septic system regulations being written by the California State Water Resources Control Board (SWRCB) to comply with AB885 (passed in 2000). We are aware that the SWRCB is in the process of drafting the regulations with input from the local county regulatory agencies and industry representatives. We have learned that the State staff recently decided to eliminate Registered Geologists (RG's) from the list of qualified professionals authorized to design septic systems. The proposed regulations only qualify Civil Engineers and Registered Environmental Health Specialists (REHS) as individuals authorized to do the work.

As industry representatives, CCGO would like to express our deepest desire to have the title of Registered Geologist included into the regulation as qualified professionals licensed to perform septic tank siting and leach field design. Our position is that the public needs more, not fewer, professionals in this field who are qualified to do the work. We believe that to exclude licensed professionals with earth science backgrounds is not a sound decision, and will lower the number of professionals in this field and increase the cost to the public and the risk to the environment.

Leachate enters and is treated in the geologic environment. Geologists know the geologic environment better than any other learned profession. Geologists are well aware of the public health aspects of groundwater contamination, and are best trained to recognize potential geologic trouble spots in leach field siting. CCGO asks you and your board to consider that, 1) geologists have been doing this type of work for decades (therefore this is not a case of the profession trying to carve out new territory), 2) the available population of other professional individuals qualified by training and experience to do actual septic tank siting and leach field design is small. Certainly, CCGO recognizes that not all engineers, not all REHS's, and not all geologists are actually fully qualified by training and experience to do this type of work, but there is a pool of qualified professionals within each field. California's consumers will be better served if the Board creates a competitive marketplace by specifying that Registered Geologists, as well as Civil Engineers and REHS's, are all legally qualified by licensure and all legally accountable by licensure to engage in this work.

Thank you for your attention to this matter, and CCGO hopes that the RG designation is written into the revised version of AB885. Please keep me informed of any additional information or hearings as this regulation develops.

Sincerely,

Rick Blake

Rick Blake
CCGO President