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**Subject:** H.35 language requiring stormwater permits be prepared by licensed professional engineers  
**Date:** Mar 4, 2015 at 11:10:52 AM GMT-5

Hi Allison, Clair, and Christopher,

I'm writing to you to ask that you amend H.35 to remove the language that stormwater permits be prepared by licensed professional engineers. Specifically, the language is found on page 83, lines 4-6, of the draft as passed by the House Committee on Fish, Wildlife, and Water Resources:

To the extent appropriate, authorize in the permitting process use of certifications of compliance by licensed professional engineers practicing within the scope of their engineering Specialty.

As an aquatic ecologist, I've been involved in preparing stormwater permits since I moved here in 2004. There are good number of professional hydrologist, watershed scientists, and environmental scientists in this state who are similiary involved in preparing stormwater permits. I know the language "to the extent appropriate" is a vague and provides wiggle room, but there's no reason to include it in the first place. This language could preclude professionals like me from providing this service to our clients. Furthermore, pProfessional engineers are expensive (billing rates to clients of \$110-\$130 per hour compared to qualified scientists who bill at \$70-\$90 per hour), sometimes over-engineer stormwater systems (I have a client with a 7 house subdivision in Monkton that includes 5 stormwater ponds and outlet structures designed by a PE), do not necessarily design stormwater management systems that perform any better than systems designed by professionals like myself who lack the professional engineering certification. In fact, many engineers call me for guidance on their designs, including how to grade appropriately and what plants are best suited for their designs.

Instead, the language should read:

To the extent appropriate, authorize in the permitting process, statements of compliance by qualified professionals practicing within the scope of their specialties.

Please call me at your convenience if you have any questions.

Daniel C. Redondo  
Principal, Aquatic Ecologist

Photos of what's growing in the nursery on [Facebook](#).



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**Senator Christopher Bray**

Addison County, Huntington & Buel's Gore

Chair, Senate Natural Resources and Energy—Room 8  
Senate Government Operations  
Vermont Telecommunications Authority

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