

CERTIFICATION

QUANDARY

The Monthly Dirt
A monthly newsletter on the California
Construction General Permit

**Your freedom
of choice...
is it being
threatened?**

Last month we shared exciting new choices storm water professionals now have when it comes to their professional certifications and credentials. After reading the July [article](#), you may have breathed a sigh of relief to realize that the education and credential you have been longing for is now within your grasp. However, much has transpired since last month's newsletter and in this edition of **The Monthly Dirt** we want to bring you up to speed on some developments which have the potential to save you significant dollars and share some unfortunate developments which threaten these new opportunities.

A Review of Your Choices: In July, we saw that the 2022 CGP specifies that QSPs must have one of the following prerequisites:

- A QSP applicant shall currently possess at least one of the following prerequisites:
- A Certified Erosion, Sediment, and Stormwater Inspector (CESSWI) registered through Enviro Cert International, Inc.;
 - A certified inspector of sediment and erosion control registered through Certified Inspector of Sediment and Erosion Control (CISEC) Inc.;
 - A Construction Management degree from an accredited 4-year institution that includes coursework that covers the underlying principles of erosion and sediment control and practices of reducing pollution in stormwater; or
 - Any prerequisite course approved by the State Water Board's Division of Water Quality Deputy Director in accordance with Section V.H.

And that QSDs must have one of these prerequisites:

- A QSD applicant shall currently possess at least one of the following prerequisites:
- A California licensed civil professional engineer;
 - A California licensed professional geologist;
 - A California landscape architect registration;
 - A professional hydrologist registration through the American Institute of Hydrology;
 - A Certified Professional in Erosion and Sediment Control (CPESC)™ registration through EnviroCert International, Inc.;
 - A Certified Professional in Stormwater Quality (CPSWQ)™ registration through EnviroCert International, Inc.; or
 - Any prerequisite course approved by the State Water Board's Division of Water Quality Deputy Director in accordance with Section V.G.

We also discussed the exciting new feature of the 2022 CGP which opened storm water education and credential opportunities to other entities who meet with the Construction General Permit Training Team's minimum qualification and content criteria and receive approval from the Water Board.

As of the last several months, there are now **five** new prerequisite options for QSPs and **five** for QSDs, which include:

New QSD options

Cuyamaca College, Environmental, Health, & Safety Management Department (Approval Letter)	Successful completion of Stormwater Management Program (EHS&M Courses: 115, 117, 220, 221, 223, 225, 226, 227, 228, AND 229)
Ecoplant Environmental, Inc. (Approval Letter)	Certified Designer of Sediment and Erosion Control (CDS&C) Certification Must be combined with an existing QSP certification or the successful completion of a QSP prerequisite.
WGR Southwest, Inc. (Approval Letter)	The Connections Course, Lessons 1 - 7
CWT Training Academy (Approval Letter)	WCAD302 - California State Qualified SWPPP Developer Prerequisite
M.S. Hatch Consulting, LLC (Approval Letter)	QSD Prerequisite Course Must be combined with an existing QSP certification or the successful completion of a QSP prerequisite.

New QSP options

M.S. Hatch Consulting, LLC (Approval Letter)	QSP Prerequisite Course
Cuyamaca College, Environmental, Health, & Safety Management Department (Approval Letter)	Successful completion of Stormwater Management Program (EHS&M Courses: 115, 117, 220, 221, 223, AND 225)
WGR Southwest, Inc. (Approval Letter)	The Connections Course, Lessons 1 - 4
CWT Training Academy (Approval Letter)	WCAD302 - California State Qualified SWPPP Practitioner Prerequisite
StormwaterONE, LLC (Approval Letter)	Qualified Compliance Inspector of Stormwater Plus (QCIS+) Certification

We also discussed the fundamental need for this change in that the non-academic professional certifying organizations offered little or no training to the person obtaining the certification. As we stated in the previous newsletter article, for the most part, the non-academic prerequisite options for QSPs and QSDs under the 2009 CGP were, and continue to be, **certifications of knowledge and not actual learning opportunities**. Therefore, if someone wanted to obtain one of those certifications they had to either procure the necessary industry knowledge from other sources or just "cram for the exam"

and hope for the best (which, in our somewhat limited observation, was usually the case and not an ideal way to learn.) Presumably because of the lack of available learning opportunities, with the issuance of the 2022 CGP, the Water Board opened, to other organizations, the possibility to become approved trainers so that the much needed education opportunities would be more readily available to future QSPs and QSDs.

Recent Policy Changes: over the last several weeks, **The Monthly Dirt** has learned, and verified with the State Water Board and the California Stormwater Quality Association (CASQA), that as of September 1, 2025, these entities will be changing their requirements for prerequisite certifications. As always, any person applying to become a QSP or QSD needs to complete all of the qualification steps shown on the [CASQA website](#). However the change in policy is regarding **"Step 2: Submit Underlying Prerequisite"**. When uploading proof of a qualifying prerequisite underlying certification, the certification needs to be active and effective on the date which it was uploaded to the CASQA website and when the QSP or QSD credential was issued to the applicant. However, **CASQA and the Water Board are no longer requiring you to perpetually maintain your certificate in place**. This is huge! It could save you significant dollars! Why the change? Two things enable this change. First, the 2022

CGP requires QSPs and QSDs to complete 6 hours of continuing education as documented on the CASQA qualification portal. Second, the prerequisite is just that—a prerequisite ... something that the credentialed person *has achieved*. It was never meant to be something that had to be perpetually maintained. Not paying the annual fee to the certifying organization doesn't mean that the professional has suddenly lost that knowledge or is having a brain dump.

Does that mean you should get rid of your underlying credentials?

Not necessarily! You probably worked hard to obtain that credential so, before you allow it to expire, you should consider the following:

⇒ Do you need that credential for work in other States or countries where the California QSP and QSD credentials are not recognized? Many of the underlying certificates that qualify for the QSP/QSD program are recognized in other States and countries.

⇒ Are there other agencies that require the certificate for individuals performing certain tasks? For example, under the Agriculture Waiver, farmers preparing Sediment and Erosion Control Plans can either prepare and self-certify the plans by taking an approved class or they can have the plan prepared by a professional that holds certain acceptable industry certifications (which do not include the QSP or QSD certifications).

The Monthly Dirt asked leading storm water certificate organizations to comment on this question. [Ecoplant Environmental](#) who issues the qualifying prerequisites Certified Inspector of Erosion and Sediment Control (CISEC) and the new Certified Designer of Sediment and Erosion Control (CDSEC) responded with the following points:

One of the most significant advantages of maintaining your membership is continued access to **professional development resources** which include:

- **Continuing Education:** Most storm water related trade organizations offer members discounted or free continuing education courses that help you stay current with industry developments and maintain your licensure requirements.
- **Specialized Training:** Access to specialized storm water related workshops, seminars, and certification programs that can help you develop new skills and expand your professional capabilities.
- **Conferences and Events:** Opportunities to attend storm water annual conferences, trade shows, and networking events where you can learn about cutting-edge practices and technologies in the storm water compliance industry.

They also pointed out that the value of

professional connections cannot be overstated. The certification can provide:

- **Peer Support Network:** Maintain relationships with a community of storm water professionals who understand the industry challenges and can offer advice and support.
- **Mentorship Opportunities:** Connect with experienced storm water professionals who can guide your career development and help you navigate industry challenges.
- **Collaboration Potential:** Discover storm water compliance partnership opportunities with other members that can lead to business growth and professional advancement.

Ecoplant stated that continued membership also allows for the support of important advocacy work:

- **Collective Voice:** Storm water organizations advocate for the interests of their members at local, state, and national levels, influencing legislation and regulations that affect your profession, and water quality overall.
- **Industry Standards:** Many storm water organizations play a role in developing and maintaining professional standards that ensure quality and safety within the industry.
- **Public Awareness:** Storm water organizations often conduct campaigns to educate the public about the importance of the profession, enhancing recognition and respect for your work towards improving overall water quality.

They also discussed how membership includes tools specifically designed to advance your career:

- **Job Boards and Career Services:** Exclusive access to job listings, career counseling, and placement services specifically tailored to the storm water compliance industry.
- **Industry Research and Publications:** Stay informed with the latest storm water compliance industry data, trends, and best practices through member-only publications, research reports, and digital resources.
- **Leadership Opportunities:** Membership provides opportunities to serve on committees or boards, which can enhance your professional reputation and expand your influence in the field.
- **Professional Legitimacy:** Active membership demonstrates to clients and employers your commitment to professional standards and ongoing education not just at the State level but also on the national/international stage.
- **Verification Services:** Storm water compliance organizations provide credential verification services that clients or employers can use to confirm your

professional standing.

- **Use of Organizational Insignia:** The ability to use a storm water compliance certifications logo on your marketing materials conveys quality and adherence to industry standards.

However some want to take away your options:

Not everyone is excited to see new prerequisite options. One such entity is [EnviroCert International, Inc. \(ECI\)](#) who was the organization which issued two of the three non-academic certification options for QSDs under the 2009 CGP (CPESC and CPSWQ; the third option, NICET's Erosion and Sediment Control, was discontinued during the permit term) and issued one of the two allowed prerequisite options (CESSWI) for QSPs. In their [August 10, 2025 letter](#) to Governor Newsom, President and CEO of ECI stated that they are in "strong opposition to the State Water Resources Control Board's [SWRCB's] recent amendments to the Construction General Permit (CGP)" and that they feel "these revisions fundamentally weaken the technical integrity of California's stormwater program and contradict both the Clean Water Act and the Porter-Cologne Water Quality Control Act." The ECI letter urges the governor to "direct the SWRCB to suspend implementation of the new QSP/QSD qualification policy and reinstate the requirement that QSPs and QSDs hold professional licensure (PE) or nationally recognized stormwater certifications (CPESC, CESSWI, or equivalent)." It is regrettable that ECI has taken such a position and, we believe, it is shortsighted on their part. If the goal is to improve the quality of storm water professionals, the key lies with more education not exclusivity. Therefore, The Monthly Dirt applauds the Water Board for their efforts to open up the educational opportunities for future QSPs and QSDs.

**Do you agree?
We want to hear from you!**

Please take this 5-question survey to let us know your opinion on the QSP/QSD prerequisites.

¹ By non-academic we are referring to the underlying / prerequisite options that do not require a **particular** academic degree such as the CPESC, CPSWQ, NICET, CESSWI, or CISEC as opposed to a professional civil engineer, professional geologist, engineering geologist, landscape architect, or professional hydrologists which would be academic pursuits.

Please contact us if you have any questions ...

The Monthly Dirt

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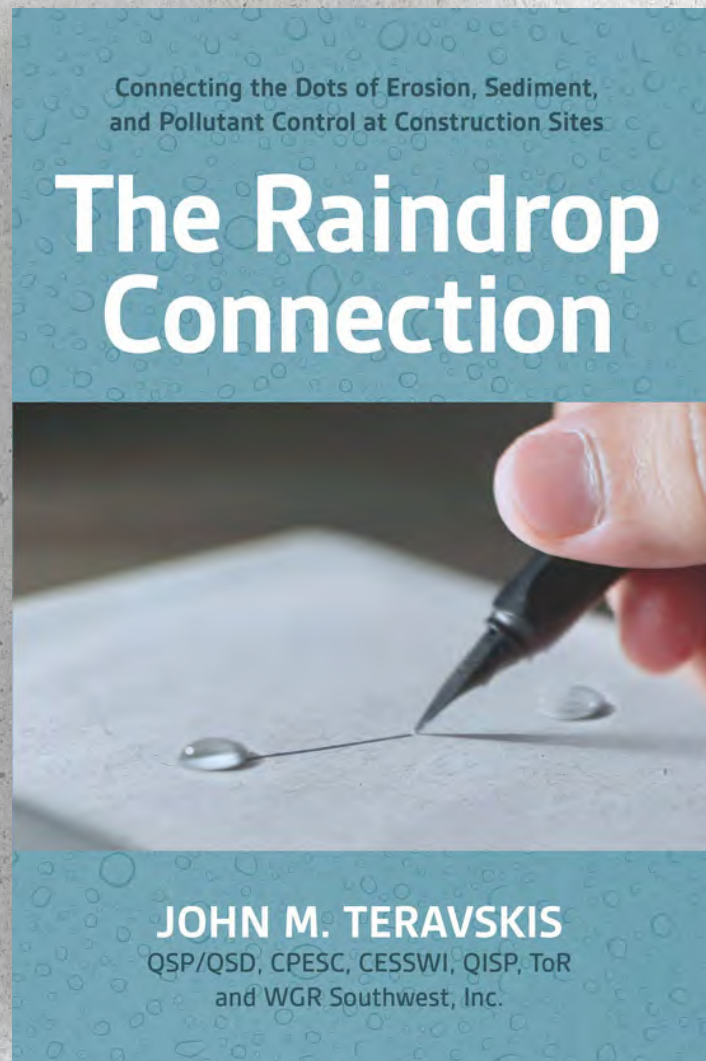


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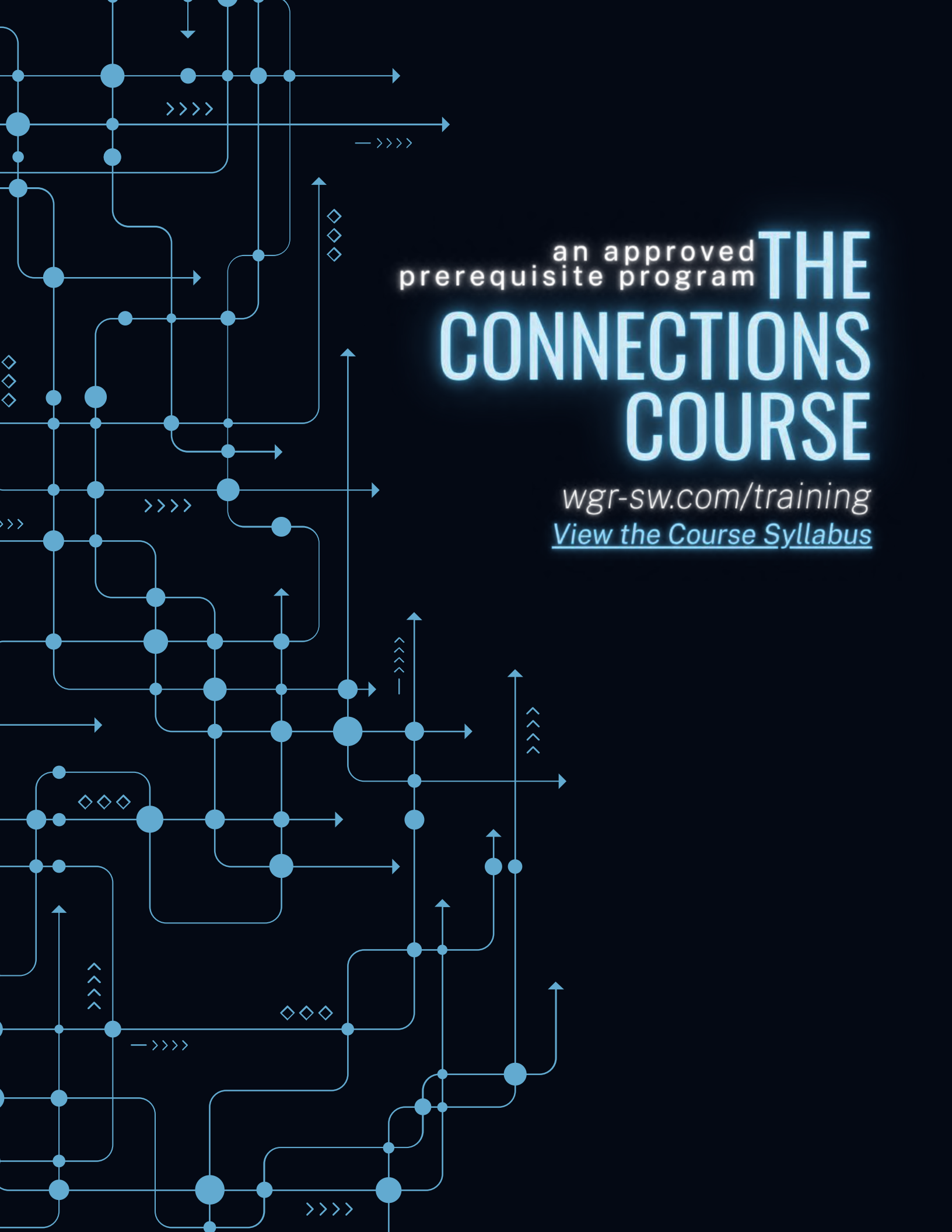
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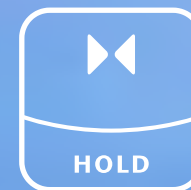
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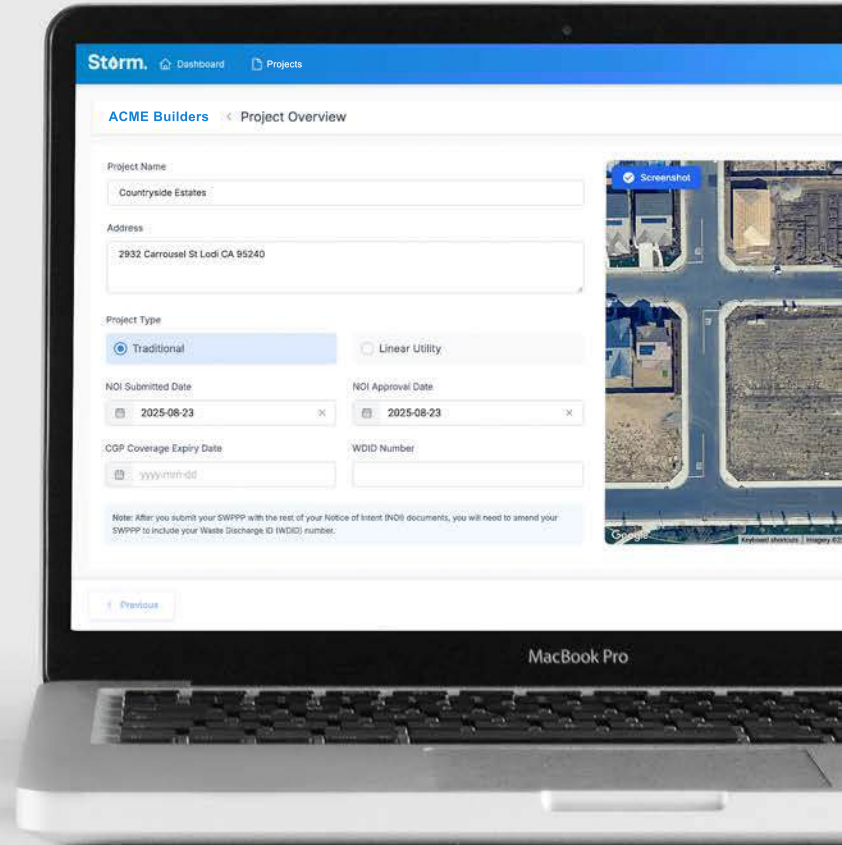
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¹Based on average completion time in beta testing.