

SOIL SCIENCE  
SOCIETY OF AMERICA

677 South Segoe Road • Madison WI 53711 • (608) 273-8095 • Fax (608) 273-2021

Department of Water Resources  
Office of Water Use Efficiency and Transfers  
Attn: Simon Eching  
P.O. Box 942836  
Sacramento, CA 94236-0001

DEC 30 2008

December 22, 2008

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Dear Mr. Eching:

The Soil Science Society of America (SSSA) through its Certified Professional Soil Scientist and Classifier (CPSS/C) programs would like to provide comment regarding the Model Water Efficient Landscape Ordinance (California Code of Regulations, Title 23 Section 490).

Comment 054.1

Our comments are specific to who qualifies to be a "soil specialist" as mentioned in section 492.7 Soil Management Plan, page 17. The site inspection and assessment will be a critical part to the success of the plan along with the soil analysis and interpretation. We would like to recommend that you specifically require a Certified Professional Soil Scientist (CPSS) to conduct the site assessment and soil analysis. A CPSS must pass two comprehensive exams, have at least five years of experience with a minimum of a Bachelor of Science (BS) degree in soil science, have five professional references and sign the code of ethics. They must earn 40 hours of continuing education every two year in order to maintain their certification. The CPSS certification provides a level of assurance that the person is qualified to perform the stated soil science tasks.

Comment 054.2

Specific language recommendations for page 17, section 492.7:  
first sentence, "... a statement of recommendation by a **Soil Science Society of America (SSSA) Certified Professional Soil Scientist (CPSS).**"

#2. "... is provided by a **SSSA CPSS.**"

#3. "... an on-site soil assessment by a **SSSA CPSS** that identifies..."

Thank you for considering our recommendations and please contact me if you have any questions. [lsmith@agronomy.org](mailto:lsmith@agronomy.org) 608-268-4977

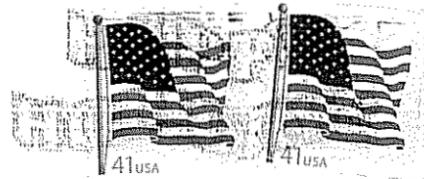
Sincerely,

Luther Smith, CAE  
Director, Certification and Licensing



American Society of Agronomy  
Crop Science Society of America  
Soil Science Society of America  
677 South Segoe Road • Madison WI 53711-1086

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