



With regards to the proposed changes to the regulatory measures set forth in Title 23. Waters, I suggest the following:

-Sec.3685 (c) Proposed changes eliminate the ability to exchange education points for experience. The previous regulation should NOT be eliminated because the pursuance of higher levels of education not only verifies a growth in knowledge, but shows the ability and desire to move upward in the organization. By allowing less motivated individuals the same opportunity of advancement is a poor decision.

-Sec. 3687 Each separate "path" outlined in the Operator Certification Requirement Table should all include educational POINT requirements, instead of listing only the semester unit requirements (this should apply to ALL grade levels). As the proposed regulations read, the only applicability of education points is if one only has a high school diploma. These point should apply to and be clarified in the table to higher education levels.