



SECTION 5

CONSTRUCTION SITE CONTROL

5. FY 08-09 CONSTRUCTION SITE CONTROL MEASURES WORK PLAN

INTRODUCTION

This section describes the Program's planned tasks during FY 08-09 to assist Co-permittees to control the impacts of construction activities on stormwater quality and flow through their construction inspection programs. The planned tasks include Program efforts that are likely to be needed to assist the Co-permittees with compliance with the C.6. Provisions of the Municipal Regional Permit.

BACKGROUND

In 1997, the Program developed Construction Inspection Performance Standards (CIPS) to define the level of implementation that Co-permittees should attain to demonstrate that their construction inspection programs control stormwater quality impacts to the maximum extent practicable. The CIPS were developed to meet a earlier permit requirement and were incorporated into the Program's *Urban Runoff Management Plan*. The CIPS were updated in 2001 (completed January 2002) to include more details on inspection frequency, enforcement procedures, and inspector training, based on discussions with Water Board staff.

The current permit requires implementation of the CIPS and lists some, but not all, of the standards in Provision C.3.a.. Co-permittees continue to implement the CIPS and provide summaries of enforcement and follow-up actions at construction sites, as well as information on inspector training, in their annual reports.

The draft Municipal Regional Permit (MRP) contains requirements for all six Phase 1 municipal stormwater (MS4s) programs in the San Francisco Bay Area. The MRP Tentative Order was released on December 4, 2007. Provision C.6. in the Tentative Order contains specific requirements for construction site controls, including requirements for:

- Sufficient legal authority for effective site management;
- Development and implementation of an enforcement response plan;
- Designation of a minimum set of required BMPs;
- Review of erosion control plans and Construction General Permit coverage, and outreach to developers and contractors as part of the plan approval process;
- Types, content and frequency of inspections;
- Staff training; and
- Tracking and reporting of construction site inspection results.

PAST AND CURRENT ACTIVITIES RELATED TO CONSTRUCTION SITE CONTROLS

As described above, the Co-permittees continue to implement the Program's performance standards by conducting reviews of erosion control plans, requiring General Permit coverage, conducting routine (including pre-wet season) and as-needed construction site inspections, documenting and reporting violations and enforcement response, and training inspectors. The Program annually co-sponsors and/or conducts a Construction Site Management Workshop to assist Co-permittees with inspector training needs, provides

guidance on annual reporting requirements, and assists Co-permittees with construction-related questions and issues as needed.

Since the fall of 2005, Program and Co-permittee staff have been involved with Water Board staff and environmental NGO representatives in a stakeholder process to develop the MRP. Work on the MRP is expected to continue through FY 07-08.

FY 08-09 IMPLEMENTATION TASKS

Table 5-1 presents a list of tasks that will be implemented in FY 08-09, their associated due dates, and the deliverables that will be completed for each task. These tasks include:

- Conduct annual workshop on Construction Site Management, in coordination with the San Francisco Estuary Program and/or CASQA. Include training on inspection type and frequency, minimum BMPs, BMP installation and maintenance, and implementation of enforcement response plans.
- Update the Construction Inspection Performance Standards as needed to be consistent with Provision C.6., including adding:
 - list of minimum BMPs;
 - guidance on different types of inspections;
 - implementation requirements for different types of sites and times of year (wet or dry season);
- Develop educational piece on minimum BMPs for use by Co-permittees;
- Work with Co-permittees on standardizing inspection forms and data collection, data management, and reporting.

**Table 5-1
Schedule and Deliverables for FY 08-09 Construction Site Control Tasks**

Task from MRP Tentative Order	Schedule	Deliverables
Minimum Required Management Practices		
<ul style="list-style-type: none"> • Update the Construction Inspection Performance Standards as needed to be consistent with Provision C.6., including adding: <ul style="list-style-type: none"> ○ list of minimum BMPs; ○ guidance on different types of inspections; ○ implementation requirements for different types of sites and times of year (wet or dry season);. 	12/08	<ul style="list-style-type: none"> • Updated Performance Standards
Plan Approval Process		
<ul style="list-style-type: none"> • Develop educational piece on minimum BMPs for use by Co-permittees 	12/08	<ul style="list-style-type: none"> • Updated sections of the C.3. Handbook and updated fact sheets.
Staff Training		
<ul style="list-style-type: none"> • Conduct annual workshop on Construction Site Management, in coordination with the San Francisco Estuary Program and/or CASQA. Include training on inspection type and frequency, minimum BMPs, BMP installation and maintenance, and implementation of enforcement response plans. 	6/09	<ul style="list-style-type: none"> • Workshop, guidance materials, evaluation summary
Tracking and Reporting		
<ul style="list-style-type: none"> • Work with Co-permittees on standardizing inspection forms and data collection, data management, and reporting. 	6/09	<ul style="list-style-type: none"> • Standard inspection form, model database, annual report guidance