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3.0 CONSTRUCTION COMPONENT

3.1 Introduction

JURMP Section 5.0 establishes a programmatic framework for conducting activities to minimize the impact of discharges from construction sites and sources on receiving waters in compliance with ***Permit Section D.2***. This section describes the programs and activities conducted by the County to implement its Construction Component during Fiscal Year (FY) 2011-12.

3.2 Source Characterization

In accordance with ***Permit Section D.2.b***, the County updated its construction site inventories at least monthly during FY 2011-12. **Attachment 3.1** presents an update to these inventories completed subsequent to the conclusion of FY 2011-12, which serve as a basis for the implementation of program activities during FY 2011-12. Summary information is also provided by watershed and threat-to-water-quality (TTWQ) priority in **Table 3.1**.

Permitted private construction projects were tracked in two separate inventories, one for the Department of Planning and Land Use (DPLU) building permits, and another for the Department of Public Works (DPW) grading and improvement permits. Capital improvement project (CIP), inventories were also each separately maintained and regularly updated by the DPW, the Department of General Services (DGS), and the Department of Parks and Recreation (DPR). A total of 1,821 sites were maintained in the inventories by the County during FY 2011-12.

TTWQ priorities for all sites in the inventory were assigned in accordance with the criteria and process described in ***JURMP Section 5.2.3***. per ***Permit Section J.3.a.(3)(b)ii***.

Projects that went through the planning process during FY 2011-12 were also reviewed to determine the applicability of advanced treatment requirements. No such projects were identified or approved to begin construction during FY 2011-12.

Table 3.1 – Construction Site Inventory Statistics

Program Element				TTWQ Priority				Watershed										
	Total Sites	Total Sites FY 10-11	Change from Previous	Exceptional Threat	High	Medium	Low	Santa Margarita (902)	San Luis Rey (903)	Carlsbad (904)	San Dieguito (905)	Peñasquitos (906)	San Diego River (907)	Pueblo (908)	Sweetwater (909)	Otay (910)	Tijuana (911)	Multiple
Private Development																		
Dept. of Planning and Land Use	1,449	1474	-2%	0	35	89	1,325	42	272	158	394	0	282	0	255	24	22	0
Dept. of Public Works	327	434	-25%	0	1	94	232	5	61	49	92	1	41	0	51	14	13	0
Total Private Construction	**1776**	**1908**	**-7%**	**0**	**36**	**183**	**1,557**	**47**	**333**	**207**	**486**	**1**	**323**	**0**	**306**	**38**	**35**	**0**
Municipal Construction (CIP)																		
Dept. of Public Works	30	23	30%	0	6	0	24	0	4	2	2	0	2	0	12	0	1	7
Dept. of Parks and Recreation	3	2	50%	0	0	0	3	0	0	0	1	0	1	0	1	0	0	0
Dept. of General Services	12	9	33%	0	5	2	5	1	0	1	3	1	1	1	3	1	0	0
Total Municipal Construction	**45**	**34**	**32%**	**0**	**11**	**2**	**32**	**1**	**4**	**3**	**6**	**1**	**4**	**1**	**16**	**1**	**1**	**7**

3.3 Updates to Ordinances and Approval Processes

The Watershed Protection Ordinance (WPO) and San Diego County Grading, Clearing and Watercourses Ordinance establish regulatory requirements for construction and grading activities. These ordinances are reviewed for necessary updates or modifications during each fiscal year. No modifications were identified as a result of these reviews**.**

3.4 Best Management Practice Requirements

JURMP Section 5.4 and Attachment 5.2, Watershed Protection Ordinance, and Director's Letter of Instruction identifies the County BMP requirements for construction and grading activities. These documents are reviewed for necessary updates or modifications during each fiscal year and during the development of the annual report. Modifications identified as a result of these reviews are identified in **Table 3.14** Implementation Results for Construction Programs.

3.4.1 Private Construction Element

The County's implementation and assessment strategy for private construction sources is described in ***JURMP Section 5.5.1***. **Figure 3.1** also provides an overview of the major elements of this strategy as it was implemented during FY 2011-12. Additional documentation, analysis, and discussion are provided as applicable below.

Private Construction Element			
Program Implementation - DPLU Building Division - DPW Private Development & Construction Inspection - DPW Watershed Protection	**Target Audiences** - Developers, Project Proponents - Contractors, Sub-contractors, Workers		**Sources** - Construction and Grading Sites / Activities
OUTCOME LEVEL 1 **Stormwater Program Activities**	**OUTCOME LEVEL 2** **Knowledge & Awareness**	**OUTCOME LEVEL 3** **Behaviors**	**OUTCOME LEVEL 4** **Source Reductions**
Program Administration ☑ Program reviews & updates ☑ Source inventory updates **Facilitation Activities** ☑ Staff training ☑ Education & outreach ☑ Permit review & approval ☑ Enforcement / return to compliance **Feedback Activities** ☑ Site investigations **(See Table 3.2 for Level 1 Results)**	☒ Not Targeted or Assessed	☑ Regulatory compliance **(See Table 3.9 for Level 3 Results)**	☒ Not Targeted or Assessed

Figure 3.1 – FY 2011-12 Implementation and Assessment Strategy for the Private Construction Element

Outcome Level 1

Table 3.2 – Program Implementation and Assessment Results for the Private Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
Program Administration		A variety of administrative activities are necessary to support the operation and management of this element of the County's stormwater program. These are described below.			
☑ **Program reviews & updates**		Throughout each fiscal year, and during year-end program reviews, County staff provides a thorough review of all elements of its JURMP and ancillary program materials to determine whether modifications are necessary. See **Table 3.14** for an updated list and schedule of modifications.			
Completion of identified program modifications		The status of program modifications identified in last year's JURMP Annual Report is described below.			
3.2.1	None Identified.	R_I = NA	NA	No targeted.	
☑ **Source inventory updates**		In accordance with ***Permit Section D.3.b(1)***, the County updates its inventory of construction sites subsequent to the completion of each fiscal year.			
3.2.2	Update DPLU construction source inventory (T = completion)	Update completed on 08-28-12 (R_{I+A} = Complete)		Update DPLU construction source inventory	The County updated its inventory of construction sites subsequent to the completion of FY 2011-12. This update is included in **Attachment 3.1**, and summarized in **Section 3.2, Table 3.1**.
3.2.3	Update DPW construction source inventory (T = completion)	Update completed on 08-22-12 (R_{I+A} = Complete)		Update DPW construction source inventory	
☑ **Staff training**		***See Section 4.14***			

Outcome Level 1

Table 3.2 – Program Implementation and Assessment Results for the Private Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
Facilitation Activities		Facilitation activities are those which assist, encourage, or require changes in the knowledge or behaviors of the individuals and populations to which program activities are directed. Facilitation results for this element are described below.			
☑ **Education & outreach**		Various outreach methods can be used to bring about changes in the knowledge or behaviors of project proponents. Outreach to this target audience is both embedded in the inspection process and conducted independently through other means. Results are described below.			
Newsletters and Presentations					
3.2.4	Provide two program information and updates using DPW Land Development Newsletter (T = 2 updates)	3 newsletters distributed (R_I = 3 updates)	R_A = Complete	Provide two program information and updates using DPW Land Development Newsletter	During FY 2011-12 three newsletters addressed stormwater issues. An estimated 279 people were reached by e-mail during FY 2011-12. These newsletters are included in **Attachment 3.2**. and are summarized in **Table 3.3.**
☑ Website operation (T = confirmation for all)		(R_{I+A} = confirmation). Websites were operated throughout the fiscal year by the DPW (http://www.sdcounty.ca.gov/dpw/watersheds.html) and DPLU (http://www.sdcounty.ca.gov/dplu/bldgforms/index.html) to provide project applicants with information regarding their regulatory requirements and options for meeting them.			
☑ **Permit approval**		As described in ***JURMP Section 5.5.1.2.1***, permit issuance and related requirements form an important part of the County's regulatory oversight process for private construction and grading activities.			
3.2.5	Not targeted	R_I = 1,449 building permits were issued	Not assessed	Not targeted	The County issued a total of 1, 449 building and 327 grading and improvement permits to start construction activities in FY 2011-12.

Outcome Level 1

Table 3.2 – Program Implementation and Assessment Results for the Private Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
3.2.6	Not targeted	R_I = 327 grading & improvement permits were issued	Not assessed	Not targeted	**Table 3.4** provides detailed information on permit issuance.
☑ **Requirement of advanced treatment** (T = confirmation)		(R_{I+A}= confirmation). ***Permit Section D.2.c(2)*** requires that the County require implementation of advanced treatment methods for sites determined to pose an exceptional threat water quality. No sites met the criteria for exceptional threat to water quality in FY 2011-12.			
☑ **Verification of BMPs prior to occupancy**		***Permit Section J.3.a.(3)(a)x.*** of the planning reporting section requires that the County confirm that BMP verification was conducted for all priority development projects prior to occupancy.			
3.2.7	Confirm BMPs are verified prior-to-occupancy	R_I = complete	Not assessed	Confirm BMPs are verified prior-to-occupancy	PDCI inspects BMPs throughout the life of the permit. Inspections are performed as they release final grade so DPLU Building could issue occupancy. PDCI would document the release by signing DPLU Building Inspection Record Card or would have already signed off the DPW permit in advance of occupancy as noted in the KIVA permit database. DPLU Building Division tracks all data in the KIVA permit database. DPLU Building does not track BMPs separately but will not approve the project if the BMPs are not installed. DPLU Building looks for the BMPs during every inspection and verify again at final inspection. DPLU Building documents the issuance of a certificate-of-occupancy by signing the DPLU Building Inspection Record Card and indicating that final inspection has passed in KIVA.
☑ **Enforcement / return to compliance**		The County has set a target of correcting all instances of non-compliance observed during routine site inspections and complaint investigations.			

Outcome Level 1

Table 3.2 – Program Implementation and Assessment Results for the Private Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
3.2.8	Correct all instances of non-compliance observed during site inspections (T = 135 instances)	135 enforcement actions returned or are on a schedule to return to compliance (R_I = 135 instances)	R_A = Complete	Correct all instances of non-compliance observed during site inspections	In each instance, success was measured as verification of a return to compliance or that an operator was working within established schedules to return to compliance. 100% of instances of non-compliance observed during routine inspections (128 actions at 117 sites for DPLU and 7 actions at 7 sites for DPW) were corrected or on a schedule to achieve compliance. **Table 3.6** provides summary information on enforcement actions associated with construction site inspections, including numbers of violations, types of enforcement actions taken, and compliance status. **Table 3.7** provides a list of sites with enforcement actions that were not resolved by the end of the reporting period, including an explanation of why these enforcement actions are not resolved. It is expected that both sites will return to compliance.
3.2.9	Report all instances of stop work orders or other high level enforcement to the RWQCB (T = Confirmation)	R_{I+A} = NA		Report all instances of stop work orders or other high level enforcement to the RWQCB	***Permit Section D.2.f*** requires the reporting of non-compliant sites to the RWQCB when a stop work order or other high level enforcement to a construction site as a result of stormwater violations. PDCI and DPLU Building did not issue any stop work orders in FY 2011-12.
3.2.10	Correct all instances of non-compliance observed during complaint investigations (T = 9 instances)	7 sites returned or on a schedule to return to compliance (R_I =7 instances)	R_A = 78% Complete	Correct all instances of non-compliance observed during complaint investigations	As shown in **Table 3.8**, 78% of all instances of complaint non-compliance (7 of 9) were resolved. See table 3.7 for the two unresolved DPLU items.

Outcome Level 1

Table 3.2 – Program Implementation and Assessment Results for the Private Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
Feedback Activities		Feedback Activities are conducted to determine whether and to what degree targeted changes are occurring in targeted staff. The implementation of feedback activities for this element is described below. Results of feedback obtained are provided in **Table 3.9**.			
☑ **Site inspections**		Site inspections are used to verify compliance and to determine whether additional actions are required to correct non-compliance. Site inspection results are described below.			
DPLU building permit inspections					
3.2.11	Inspect all high priority construction sites bi-weekly during the wet season (T = 35 sites)	35 high priority sites inspected biweekly during wet season (R_I = 35 sites)	R_A = Complete	Inspect all high priority construction sites bi-weekly during the wet season	***Permit Section D.2.d.(1)-(4)*** prescribes minimum inspection frequencies for high, medium, and low priority construction sites during the wet and dry weather seasons. DPLU Building Division maintained its success rate in FY 2011-12 when compared to FY 2010-11. The overall success rates for the wet season inspection targets were 100% for high, 100% for medium priority sites and 90.3% for low priority sites. For high priority sites, 35 out of 35 sites met or exceeded their wet season inspection targets. For medium priority sites, 89 out of 89 sites met or exceeded their wet season inspection targets. For low priority sites DPLU, met the wet season inspection targets 90% of the time on a total of 1,325 low priority sites. The projects that did not meet the inspection targets consisted mostly of small projects accessory to residential buildings. Most of these were missed because permits were expired and there was not any construction activity during the wet season. Expired sites must resubmit to the County in order to proceed with construction. They will be inspected once active.
3.2.12	Inspect all medium priority construction sites monthly during the wet season (T = 89 sites)	89 of the medium priority sites inspected monthly during wet season (R_I = 89 sites)	R_A = Complete	Inspect all medium priority construction sites monthly during the wet season	
3.2.13	Inspect all low priority construction sites twice during the wet season (T = 1,325 sites)	1,197 low priority sites inspected twice during wet season (R_I = 1,197 sites)	R_A = 90.3% Complete	Inspect all low priority construction sites twice during the wet season	

Outcome Level 1

Table 3.2 – Program Implementation and Assessment Results for the Private Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
DPW grading & improvement inspections					
3.2.14	Inspect all high priority construction sites bi-weekly during the wet season (T = 1 site)	1 high priority site was inspected biweekly during the wet season (R_I = 1 site)	R_A = Complete	Inspect all high priority construction sites bi-weekly during the wet season	***Permit Section D.2.d.(1)-(4)*** prescribes minimum inspection frequencies for high, medium, and low priority construction sites during the wet and dry weather seasons. An overall success rate of 100% was achieved by DPW Private Development in meeting the wet season inspection target.
3.2.15	Inspect all medium priority construction sites monthly during the wet season (T = 94 sites)	94 medium priority sites were inspected biweekly during the wet season (R_I = 94 sites)	R_A = Complete	Inspect all medium priority construction sites monthly during the wet season	
3.2.16	Inspect all low priority construction sites twice during the wet season (T = 232 sites)	232 low priority sites were inspected twice during the wet season (R_I = 232 sites)	R_A = Complete	Inspect all low priority construction sites twice during the wet season	
☑ **Complaint investigations**		Complaint investigations are conducted in response to reports of potential violations (e.g., through complaints or staff referrals).			

Outcome Level 1

Table 3.2 – Program Implementation and Assessment Results for the Private Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
3.2.17	Investigate all justified complaints (T = 9 complaints)	9 justified complaints investigated (R_I = 9 complaints)	R_A = Complete	Investigate all justified complaints	DPLU Code Enforcement Division handled all complaints of grading without a permit in the unincorporated County during FY 2011-12. There were 9 such complaints during this time.

Table 3.3 – Materials Distribution to the Construction Industry

Date	Target Audience	Estimated Number	Description
October 2011	Professional Societies, Surveyors and Engineers	93	Land Development News Article: Hydromodification Management Plan Requirements
March 2012	Professional Societies, Surveyors and Engineers	93	Land Development News Article: Geomorphic Assessments
May 2012	Professional Societies, Surveyors and Engineers	93	Land Development News Article: Standard Urban Stormwater Mitigation Plan Update
Totals		**279**	

Table 3.4 – Active Permits for Private Development Projects

Permit Type		High Priority	Med. Priority	Low Priority	Total
GRADING AND IMPROVEMENT PERMITS (Updated August 2011)					
4100	Permit- Public Improvements, Major Subdivision	0	2	38	40
4110	Permit- Private Improvements, Major Subdivision	1	2	17	20
4200	Permit- Public Improvements, Minor Subdivision	0	0	7	7
4210	Permit- Private Improvements, Minor Subdivision	0	0	31	31
4500	Permit- Public Improvements, Curb Grade	0	1	39	40
4700	Permit- Major Grading Permit	0	92	97	189
BUILDING PERMITS (Updated August 2011)					
1003	Permit - Single Family Dwelling (SFD)	7	4	327	338
1004	Permit - SFD Additions, SFD Remodels, Garage Convert	0	0	317	317
1005	Misc. Permits - Retaining Walls, Patio Covers, Antennae, Demos, Re-roofs, Combination Electric, Plumbing, and/or Mechanical	0	1	18	19
1006	Permit - Accessory to SFD/Duplex: Barns, Ag. Building, Detached Garage/Storage Building, Second Dwelling, Guesthouse, Cabana	0	0	303	303
1014	Permit - Tract Parent	23	4	0	27
1015	Permit - Tract	0	0	0	0
1019	Permit - Commercial	4	3	55	62
1021	Permit - OTC Commercial (Signs, OTC Tls, Antennae, Small Commercial Additions)	0	0	4	4
1023	Swimming Pools & Spas	0	0	261	261
1026	Minor Grading - Plan Check & Permit	1	77	1	79

Table 3.4 – Active Permits for Private Development Projects

Permit Type		High Priority	Med. Priority	Low Priority	Total
1030	Homeowner/Business Relief Permit	0	0	1	1
1033	Mobile Home on Private Lot	0	0	35	35
1035	Mobile Home Park Permits	0	0	0	0
1037	Farm Employee Housing	0	0	3	3
Totals					**1,449**

Table 3.5 – Private Construction Inspections by TTWQ Priority

Implementing Department	High Priority				Medium Priority				Low Priority				All Priorities			
	No. Sites	No. Dry Weather Inspections	No. Wet Weather Inspections	% Meeting Inspection Frequency	No. Sites	No. Dry Weather Inspections	No. Wet Weather Inspections	% Meeting Inspection Frequency	No. Sites	No. Dry Weather Inspections	No. Wet Weather Inspections	% Meeting Inspection Frequency	No. Sites	No. Dry Weather Inspections	No. Wet Weather Inspections	% Meeting Inspection Frequency
Building Permits (DPLU)	35	774	1,280	100%	89	113	411	100%	1,325	650	1,267	90.3%	1,449	1,537	2,958	91.2%
Grading/Imp. Permits (DPW)	1	2	3	100%	94	523	927	100%	232	525	870	100%	327	1,050	1,800	100%
Totals	**36**	**776**	**1,283**	**100%**	**183**	**636**	**1,338**	**100%**	**1,557**	**1,175**	**2,137**	**95%**	**1,776**	**2,587**	**4,758**	**96%**

Table 3.6 – Inspections - Return to Compliance Statistics (Construction Site Inspections)

Implementing Department	Total Inspections Conducted	Return to Compliance																
		Enforcement Actions															Compliance Status	
								Admin Citation										
		Total	Total Sites Receiving Enforcement	Administrative Warnings	Written Warning	Correction Notice	Notice Of Violation	1st Citation	2nd Citation	3rd Citation	4th Citation	Stop Work	Warning For Grading W/O Permit	Citation For Grading W/O Permit	Other	High Level Enforcement Referred to RWQCB (number of Actions)	Returned to Compliance	On a schedule to return to compliance
Building Permits (DPLU)	4,556	128	117	0	0	128	0	2	2	0	0	0	0	0	0	0	117	0
Grading & Imp. Permits (DPW)	2,846	7	7	7	0	0	0	1	0	0	0	0	0	0	0	0	7	0
Totals	**7,402**	**135**	**124**	**7**	**0**	**128**	**0**	**3**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**124**	**0**

Table 3.7 – Inventory of Unresolved Construction Enforcement Cases

Site APN	Address/Location	Permit Number	Violation	Date Issued	Explanation of why not resolved
286-031-32-00	No Address	L-15650	11-0070471	7-19-11	Enforcement staff has been assisting the property owner to resolve this violation. The property owner has obtained a grading permit from the Department of Public Works and is working on correcting this violation.
510-090-17-00	5737 Moorefield Drive	L-15663	11-0072990	10-27-11	Enforcement staff has been assisting the property owner to resolve this violation. The property owner has obtained a grading permit from the Department of Public Works and is working on correcting this violation.

Table 3.8 – Complaints - Return to Compliance Statistics (Construction and Grading Complaints)

	Pollutant Type											Enforcement Actions					Compliance Status	
# Justified Complaints	Sediment	Concrete Waste	Manure	Nutrients	Sewage	Trash/Debris	Auto Fluids	Aqueous	Paint	Grease	Chemicals / Other	Admin Warnings	Admin Citations	Stop Work Orders	Criminal Citations	Other - Administrative	Returned to Compliance	On a schedule to return to compliance
9	9	0	0	0	0	0	0	0	0	0	0	6	17	0	0	0	7	2

Outcome Level 3

Table 3.9 – Regulatory Compliance in Construction Target Audiences (Level 3 Outcomes)

	FY 2011-12 Targets ◎	Implementation Result ☑	Assessment Result ▦	Next Fiscal Year Targets ◎
Behavioral changes are ideally expressed in terms of proper BMP implementation. A decrease in rates of violations may be considered a general confirmation of increased BMP implementation. During FY 2011-12, stormwater violations were observed during only 128 of 4,556 DPLU inspections (2.8%), and during 7 of 2,846 DPW inspections (0.2%). Both of these rates were considerably lower than the target of 10% established by both departments. **Table 3.10** also compares compliance rates for sites regulated by DPLU Building and DPW Land Development over the last ten years.				
3.9.1	≤ 10.0% of DPLU inspections result in stormwater violations ($T \leq 456$)	2.8 % of inspections resulted in stormwater violations ($R_I = 128$)	R_A >100% success	≤ 10% of DPLU inspections result in stormwater violations
3.9.2	≤ 10% of DPW inspections result in stormwater violations ($T \leq 285$)	0.2 % of inspections resulted in stormwater violations ($R_I = 7$)	R_A >100% success	≤ 10% of DPW inspections result in stormwater violations

Table 3.10 – Multi-year Comparison of Regulatory Compliance at Construction Sites

	FY 2002-03	FY 2003-04	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12
	Inspections without Stormwater Violations									
DPLU										
No. of Inspections Conducted	48,900	47,138	50,101	38,978	37,877	30,493	28,309	25,034	23,597	4,556*
% of inspections that resulted in stormwater violations (Target ≤ 10%)	**1.9%**	**5.6%**	**3.2%**	**2.8%**	**3.1%**	**2.0%**	**0.8%**	**0.8%**	**0.6%**	**2.8%**
DPW										
No. of Inspections Conducted	5,123	1,744	2,306	6,584	5,580	8,095	5,610	4,570	3,461	2,486
% of inspections that resulted in stormwater violations (Target ≤ 10%)	**8.0%**	**6.5%**	**7.8%**	**0.9%**	**2.2%**	**1.0%**	**0.6%**	**1.0%**	**0.6%**	**0.2%**

***Previous years included non-stormwater inspections.**

Municipal Construction Element

The County's implementation and assessment strategy for municipal construction sources (Capitol Improvement Projects) is described in ***JURMP Section 5.5.2***. **Figure 3.2** also provides an overview of the major elements of this strategy as it was implemented during FY 2011-12. Additional documentation, analysis, and discussion are provided as applicable below.

Municipal Construction Element			
Program Implementation - DPW Capital Improvement - DPR Capital Improvement - DGS Capital Improvement - DPW Watershed Protection	**Target Audiences** - Contractors, Sub-contractors, Workers		**Sources** - Construction and Grading Sites / Activities
OUTCOME LEVEL 1 **Stormwater Program Activities**	**OUTCOME LEVEL 2** **Knowledge & Awareness**	**OUTCOME LEVEL 3** **Behaviors**	**OUTCOME LEVEL 4** **Source Reductions**
Program Administration ☑ Program reviews & updates ☑ Source inventory updates **Facilitation Activities** ☑ Staff training ☑ Project review & approval ☑ Enforcement / return to compliance **Feedback Activities** ☑ Site investigations **(See Table 3.11 for Level 1 Results)**	☒ Not Targeted or Assessed	☑ Regulatory compliance **(See Table 3.13 for Level 3 Results)**	☒ Not Targeted or Assessed

Figure 3.2 – FY 2011-12 Implementation and Assessment Strategy for the Municipal Construction Element

Outcome Level 1

Table 3.11 – Program Implementation and Assessment Results for the Municipal Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
Program Administration		A variety of administrative activities are necessary to support the operation and management of this element of the County's stormwater program. These are described below.			
☑ **Program reviews & updates**		Throughout each fiscal year, and during year-end program reviews, County staff provides a thorough review of all elements of its JURMP and ancillary program materials to determine whether modifications are necessary. See **Table 3.14** for an updated list and schedule of modifications.			
Completion of identified program modifications		The status of program modifications identified in last year's JURMP Annual Report is described below			
3.11.1	Not targeted	R_I = None	No additional assessment currently needed	No targeted	No substantial modifications were identified during the review of the JURMP in FY 2011-12. The next planned JURMP update will be during the reissuance of the Permit.
Identification of additional needed program modifications		An annual review of ***JURMP Section 5.5.2*** and other ancillary program documentation was completed. A comprehensive review was performed during the development of this JURMP Annual Report.			
☑ **Source inventory updates**		In accordance with ***Permit Section D.2.b***, the County updates its inventory of municipal construction sites subsequent to the completion of each fiscal year.			
3.11.2	Update DPW-CIP construction source inventory (T= completion)	Update completed on 07-13-12 (R_{I+A} = Complete)		Update DPW-CIP construction source inventory	The County updated its inventory of municipal construction sites subsequent to the completion of FY 2011-12. These updates are included in **Attachment 3.1** and summarized in **Section 3.2, Table 3.1.**
3.11.3	Update DPR-CIP construction source inventory (T= completion)	Update completed on 08-15-12 (R_{I+A} = Complete)		Update DPR-CIP construction source inventory	

Outcome Level 1

Table 3.11 – Program Implementation and Assessment Results for the Municipal Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
3.11.4	Update DGS-CIP construction source inventory (T= completion)	Update completed on 08-01-12 (R_{I+A} = Complete)		Update DGS-CIP construction source inventory	
Facilitation Activities		Facilitation activities are those which assist, encourage, or require changes in the knowledge or behaviors of the individuals and populations to which program activities are directed. Facilitation results for this element are described below.			
☑ **Staff training**		***See Section 4.14***			
☑ **CIP Projects under construction**		Projects under construction are also a part of the County's regulatory oversight process. As described in ***JURMP Section 5.5.2.2.1***, municipal projects that are approved for construction are required to meet the same requirements that apply to the private construction and grading activities.			
3.11.5	Not targeted	R_I = 30 DPW-CIP projects under construction	Not assessed	Not targeted	The County DPW-CIP had 30 projects under construction, DPR-CIP had 3 projects under construction, and DGS-CIP had 12 projects under construction during FY 2011-12.
3.11.6	Not targeted	R_I = 3 DPR-CIP projects under construction	Not assessed	Not targeted	
3.11.7	Not targeted	R_I = 12 DGS-CIP projects under construction	Not assessed	Not targeted	
☑ **Requirement of advanced treatment** (T = confirmation)		(R_{I+A} = confirmation). ***Permit Section D.2.c(2)*** requires that the County require implementation of advanced treatment methods for sites determined to pose an exceptional threat water quality. No sites met the criteria for exceptional threat to water quality in FY 2011-12			

Outcome Level 1

Table 3.11 – Program Implementation and Assessment Results for the Municipal Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
☑ **Enforcement / Return to Compliance**		The County has set a target of correcting all instances of non-compliance observed during routine site inspections or complaint investigations.			
3.11.8	Correct all instances of non-compliance observed during DPW site inspections (T = 74 instances)	74 instances returned or on a schedule to return to compliance (R_I = 74 instances)	R_A = Complete	Correct all instances of non-compliance observed during site inspections	As in previous years, the County set a target of correcting all instances of non-compliance observed during routine site inspections in FY 2011-12. In each instance, success was measured as verification of a return to compliance or that an operator was working within established schedules to return to compliance. All instances of non-compliance observed during routine inspections (74 of 74) were corrected or on a schedule to achieve compliance.
3.11.9	Report all instances of stop work orders or other high level enforcement to the RWQCB (T = confirmation)	0 instances reported (R_{I+A} = NA)		Report all instances of stop work orders or other high level enforcement to the RWQCB	***Permit Section D.2.f*** requires the reporting of non-compliant sites to the RWQCB when a stop work order or other high level enforcement to a construction site as a results of stormwater violations. There were no instances of high level enforcement actions reported to the RWQCB.
Feedback Activities		Feedback Activities are conducted to determine whether and to what degree targeted changes are occurring in targeted staff. The implementation of feedback activities for this element is described below. Results of feedback obtained are provided in **Table 3.13**.			
☑ **Site inspections**		Site inspections are used to verify compliance and to determine whether additional actions are required to correct non-compliance. Site inspection results are described below.			
DPW-CIP Inspections		Note: DPW-CIP did not have any medium priority sites for FY 2011-12.			

Outcome Level 1

Table 3.11 – Program Implementation and Assessment Results for the Municipal Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
3.11.10	Inspect all high priority construction sites bi-weekly during the wet season (T = 6 sites)	6 high priority sites were inspected biweekly during the wet season (R_I = 6 sites)	R_A = Complete	Inspect all high priority construction sites biweekly during the wet season	***Permit Section D.2.d.(1)-(4)*** prescribes minimum inspection frequencies for high, medium, and low priority construction sites during the wet and dry weather seasons. There were no medium priority sites. An overall success rate of meeting 100% of the targeted inspection was achieved by DPW-CIP.
3.11.11	Inspect all low priority construction sites twice during the wet season (T = 24 sites)	24 low priority sites were inspected twice during the wet season (R_I = 24 sites)	R_A = Complete	Inspect all low priority construction sites twice during the wet season	
DPR-CIP Inspections					
3.11.12	Inspect all medium priority sites monthly during the wet season (T = 0 site)	0 medium priority sites were inspected monthly during the wet season (R_I = NA)	R_A = Complete	Inspect all medium priority construction sites monthly during the wet season	***Permit Section D.2.d.(1)-(4)*** prescribes minimum inspection frequencies for high, medium, and low priority construction sites during the wet and dry weather seasons. There were no medium or high priority sites. An overall success rate of meeting 100% of the targeted inspection was achieved by DPR-CIP.

Outcome Level 1

Table 3.11 – Program Implementation and Assessment Results for the Municipal Construction Element (Level 1 Outcomes)

FY 2011-12 Targets (T)		Implementation Result (R_I)	Assessment Result (R_A)	Next Fiscal Year Targets	Explanation
3.11.13	Inspect all low priority construction sites twice during the wet season (T = 3 sites)	3 low priority sites were inspected twice during the wet season (R_I = 3 sites)	R_A = Complete	Inspect all low priority construction sites twice during the wet season	
DGS-CIP Inspections					
3.11.14	Inspect all high priority construction sites biweekly during the wet season (T = 5 sites)	5 high priority sites were inspected biweekly during the wet season (R_I = 5 sites)	R_A = Complete	Inspect all high priority construction sites biweekly during the wet season	***Permit Section D.2.d.(1)-(4)*** prescribes minimum inspection frequencies for high, medium, and low priority construction sites during the wet and dry weather seasons. An overall success rate of meeting 100% of the targeted inspection was achieved by DGS-CIP.
3.11.15	Inspect all medium priority construction sites monthly during the wet season (T = 2 sites)	2 medium priority sites were inspected monthly during the wet season (R_I = 2 sites)	R_A = Complete	Inspect all medium priority construction sites monthly during the wet season	
3.11.16	Inspect all low priority construction sites twice during the wet season (T = 5 sites)	5 low priority sites were inspected twice during the wet season (R_I = 5 sites)	R_A = Complete	Inspect all low priority construction sites twice during the wet season	

Table 3.12 – Municipal Construction Inspections by TTWQ Priority

Implementing Department	High Priority				Medium Priority				Low Priority				All Priorities			
	No. Sites	No. Dry Weather Inspections	No. Wet Weather Inspections	% Meeting Inspection Frequency	No. Sites	No. Dry Weather Inspections	No. Wet Weather Inspections	% Meeting Inspection Frequency	No. Sites	No. Dry Weather Inspections	No. Wet Weather Inspections	% Meeting Inspection Frequency	No. Sites	No. Dry Weather Inspections	No. Wet Weather Inspections	% Meeting Inspection Frequency
DPW-CIP	6	74	80	100%	0	0	0	100%	24	51	71	100%	30	125	151	100%
DPR-CIP	0	0	0	0	0	0	0	100%	3	23	31	100%	2	23	31	100%
DGS-CIP	5	50	132	100%	2	36	60	100%	5	10	72	100%	12	96	264	100%
Totals	**11**	**124**	**212**	**100%**	**2**	36	**60**	**100%**	**32**	**84**	**174**	**100%**	**44**	**244**	**446**	**100%**

Outcome Level 3

Table 3.13 – Regulatory Compliance at DPW CIP Sites (Level 3 Outcomes)

	FY 2011-12 Targets ◎	Implementation Result ☑	Assessment Result ▦	Next Fiscal Year Targets ◎
Attachment 3.4 contains a site-by-site summary of these violations. Future efforts will focus on tracking violations for all departments conducting CIP projects to assess the overall implementation of BMPs, how change occurs over time, and how results vary categorically (e.g., by major and minor discrepancy).				
3.13.1	<25% of DPW-CIP inspections result in stormwater violations (T = 276 Inspections)	26.8% of inspections resulted in violations (R_I = 74)	R_A = failed to meet the less than 25% goal by 1.8%.	≤ 25% of DPW-CIP inspections result in stormwater violations
Behavioral changes are ideally expressed in terms of proper BMP implementation. A quantification of violations and the rate of change in violations may be considered a general confirmation of increased BMP implementation. DPW- CIP tracks violations on a site-by site basis throughout the year; 26.8% of inspections resulted in stormwater violations. All (26.8%) were minor discrepancies (e.g. damaged silt fence, sweeping, dust control, etc.), and 0% (0) major.				

3.5 Program Review and Modification

In accordance with ***Permit Section I.1.b***, the County has reviewed the results of its JURMP effectiveness assessment and other relevant information to identify modifications needed to maximize JURMP effectiveness and achieve compliance with Permit section A. **Table 3.14** identifies planned modifications and improvements to the Construction JURMP Component and estimated schedules for their completion.

Table 3.14 – Planned Modifications to the Construction Component

Target Date	JURMP Section(s)	Planned Modification(s)
A. JURMP Modifications		
TBD	TBD	Changes recommended in the FY 2011- 12Annual Report were not substantial enough to warrant a JURMP update at this time. The recommendations will be reconsidered after the reissuance of the permit.
B. Ancillary Program Documentation		
TBD	TBD	There have been no identified ancillary program documentation identified for updates at this time.