

5 Construction Management

5.1 Introduction

Construction activities include clearing, grubbing, grading, stockpiling, excavation, building, landscaping, utility installation, and street improvements. All pollutants potentially generated by these and other construction-related activities can impact the City of Santee's (City's) storm water conveyance system, as well as local receiving waters and the San Diego River Watershed. The construction management component of the City's Jurisdictional Runoff Management Program (JRMP) identifies the pollutants that may exist at active construction sites and presents a range of best management practices (BMP) and supporting administrative processes designed to eliminate or reduce them.

As a measure to protect water quality, the City treats certain construction sites as high priority. High priority sites receive more frequent inspections by City staff than other construction sites in order to reduce discharges of sediment. This should help reduce the mobilization of bacteria to receiving waters; bacteria are the highest priority water quality condition in the San Diego River Watershed.

The cooperation of various responsible parties, such as construction site owners and developers, is key to the continued success of Santee's JRMP in complying with Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 (Municipal Permit). To secure their cooperation, the City has updated its ordinances and guidance documents as an authorized form of legal enforcement. The following sections detail how the City will meet the minimum requirements outlined in Section E.4 of the Municipal Permit to eliminate or reduce the release of pollutants into the storm water conveyance system and adjacent water bodies to the maximum extent practicable.

5.2 Best Management Practice Requirements

5.2.1 Minimum BMP Requirements

Construction sites within the City's jurisdiction are required to implement and maintain BMPs in the following categories, where applicable, as required by the Municipal Permit:

- Project Planning
- Erosion Control
- Sediment Control
- Run-on and Runoff Control

- Good Site Management (“Housekeeping”), including Waste Management
- Non-Storm Water Management
- Active/Passive Sediment Treatment Systems

The City uses the California Stormwater Quality Association (CASQA) BMP fact sheets as the guidepost for minimum BMP standards. The City’s Guidelines for Surface Water Pollution Prevention (Appendix C) provides more detail on the BMP requirements, including identifying how the CASQA BMPs align with the Municipal Permit BMP categories listed above. The City’s Guidelines for Surface Water Pollution Prevention also identifies which CASQA BMPs are likely applicable to each phase of construction, and projects are required to schedule in advance which BMPs may be applicable to each phase. The City’s requirements are based on three major phases of construction, as defined below:

- **Grading:** Demolition, right-of-way work, site preparation and earthmoving, earthwork, construction or relocation of above ground and below ground utilities, construction or relocation of below ground structures, work associated with construction of above ground structures more than five feet from the structures, dewatering, and hydrostatic testing of utilities and fire systems.
- **Vertical:** Construction of above ground structures in the area within five feet from structures, stucco, framing, mechanical, roofing, painting, drain flushing, and fire system testing (hydrants, sprinklers).
- **Finish:** Roadways, slurry seal, asphalt, concrete, walkways, parking lots, landscaping, painting, striping, traffic and lighting facilities, architectural.

The City requires a complete set of BMPs at all sites, with an emphasis on an effective combination of both erosion and sediment control BMPs. Sediment control BMPs (typically known as perimeter controls) must always be implemented along with erosion control BMPs (intermediate controls). All construction BMPs must be properly installed, routinely inspected, and maintained until they are removed. The BMPs selected for each project must be appropriate to the types of work proposed, including the different phases of construction. Projects one acre or greater in size are also subject to the requirements of the statewide Construction General Permit, State Water Resources Control Board Order No. 2009-0009-DWQ, as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ (Construction General Permit).

The City may require additional BMPs to be implemented at construction sites, above and beyond those listed in the City’s Guidelines for Surface Water Pollution Prevention, to prevent pollutants from discharging from construction sites to the maximum extent practicable.

5.3 Project Approval Process

All land development projects (either private or CIP) that will disturb soil are required to complete an Erosion Control Plan. The Department of Development Services (DDS) reviews the Erosion Control Plan for consistency with the minimum BMP requirements, as outlined in the City's Guidelines for Surface Water Pollution Prevention (Appendix C). The Erosion Control Plan is included as part of the grading plan submittal to DDS, and a grading permit is not issued until the grading plan submittal, including the Erosion Control Plan, is approved. The City also requires projects subject to the Construction General Permit (CGP) to submit proof of coverage before construction work is permitted to begin.

When a project is subject to the Construction General Permit, the City also reviews the Storm Water Pollution Prevention Plan (SWPPP). The City focuses its review on the project description, construction schedule, activity specific BMPs, and the monitoring plan. The City requires an erosion control bond, which allows for the City to step in to perform BMP implementation or repair should the developer not adequately implement such controls. The erosion control bond ensures that funds will be available to repair or construct BMPs in the event of default by the responsible party.

5.4 Construction Site Inventory and Prioritization

The City maintains an inventory of active construction sites within its jurisdiction. The inventory includes details on each construction site, including project name, location, and construction site priority. Privately-owned development projects are added to the City's construction inventory when grading permits are approved. CIP projects are added to the construction inventory when a project begins construction. Completed projects are removed from the inventory upon finalization, as reported by City inspectors. The City's construction inventory is updated on a regular basis (and at least quarterly). The City uses spreadsheet to manage its inventory, and includes the following components as required by the Municipal Permit:

- Contact information for each site (e.g., name, address, phone, and email for the owner and contractor)
- Basic site information including location (address and hydrologic subarea (HSA)), Waste Discharger Identification (WDID) number (if applicable), size of the site, and approximate area of disturbance
- Whether the site is considered high priority
- Project start and completion dates
- Required inspection frequency

- Date of permit issuance
- Any enforcement actions administered to the site

Although the City of Santee is required to only identify high priority and standard priority, the City assigns a priority of high, medium, or low priority, as summarized in Table 5-1. The City designates projects that represent a high threat to water quality with a “high” site priority and has aligned the local definition of “high threat to water quality” to the risk determination approach of the Construction General Permit. The Construction General Permit determines risk level based on project specific sediment risk and receiving water risk, which addresses the required factors of Municipal Permit Section E.4.b.(2). Whether or not a construction project is located within, is directly adjacent to (within 200 feet of), or discharges directly to a receiving water within an environmentally sensitive area is also a factor in determining a construction site’s priority.

Table 5-1. Criteria to Identify High Priority Construction Projects

Construction General Permit Criterion	Environmentally Sensitive Area ¹	Site Priority
Risk Level 2 or 3 LUP Type 2 or 3	Yes or No	High
Risk Level 1 or LUP Type 1	Yes	High
	No	Medium
All other projects	Yes	Medium
	No	Low

Notes: LUP – Linear Underground/Overhead Project

¹ Located within, directly adjacent to (within 200 feet of), or discharging directly to a receiving water within an environmentally sensitive area. See Section 1 of this JRMP document for more information about the City’s environmentally sensitive areas.

5.5 Inspection of Construction Sites

The City has an established inspection program to evaluate proper BMP implementation at construction sites within the City’s jurisdiction. The inspection program is designed to confirm sites reduce the discharge of pollutants in storm water to the maximum extent practicable and effectively prohibit non-storm water discharges.

Pre-construction meetings are typically held with the contractor before work begins. During these meetings City staff discuss BMP requirements, including how they apply over the life of the construction project, as it progress from one phase to another. Contractors are also informed that City inspectors have the authority to require implementation of any and all BMPs the inspector deems necessary to reduce pollutant discharges to the maximum extent practicable, even if those BMPs are not explicitly shown on the project’s Erosion Control Plan.

Once construction starts, the Engineering Inspector is tasked with performing regularly scheduled site inspections to ensure BMPs are implemented consistent with the Erosion Control Plan and the City’s Guidelines for Surface Water Pollution Prevention during each stage of development.

5.5.1 Inspection Frequency

The criteria used to determine a construction site’s priority discussed in Section 5.4 were developed to correspond to the inspection frequencies established by the City. Table 5-2, below, presents the construction site priorities and their corresponding inspection frequencies for the wet (October 1 through April 30) and dry (May 1 through September 30) seasons.

Table 5-2. Construction Site Inspection Frequency

Construction Site Priority	Wet Season Inspection Frequency	Dry Season Inspection Frequency
High	Every two weeks	As needed
Medium	Monthly	
Low	As needed	

The City re-evaluates a construction site’s priority and subsequent inspection frequency on a regular basis, particularly when grading activities are being conducted during the wet season. The City maintains the right to inspect a site as often as deemed necessary. The need for additional inspections can vary depending on site conditions, previous violations, history of developer or contractor past performance, and/or weather patterns. The number of inspections performed at each construction site will be tracked to ensure all construction sites in the City’s inventory are being inspected at the appropriate frequency.

The City’s construction inspection program is expected to reduce discharges of sediment and other pollutants associated with construction projects. Since most discharges of sediment from construction sites occur when it rains, the City also sends out a Courtesy Rain Notice to all construction sites asking them to perform a pre-rain inspection, reminding them of the need to stabilize their site, and implement their REAP or monitoring plans as applicable. Regular interaction with site’s responsible parties will allow City inspectors to ensure appropriate BMPs are in place as construction activities and phases change over time.

5.5.2 Inspection Procedure

Site inspections evaluate compliance with the City’s minimum BMP requirements, with the SWPPP if applicable, and as may be required through applicable ordinances and permits. Inspection findings are documented on the City’s Construction Site Storm Water Inspection form. At a minimum, inspections include the following components.

- Assessment of the implementation of all required minimum BMPs and any additional BMPs that may be deemed necessary by the City. This assessment includes evaluating the adequacy and effectiveness of implemented BMPs, including how they are maintained.
- Assessment of whether project proponents are making appropriate adjustments when BMP deficiencies are found as a result of self- or City-conducted inspections.
- Visual observations of actual or potential discharges of sediment or construction related materials from the site.
- Visual observations to evaluate presence of non-storm water discharges.
- Visual observations of actual or potential illegal connections.
- Verify that the SWPPP is on site, and inspection records are current, when applicable.

A Construction Site Storm Water Inspection report is provided following the inspection. This report identifies the current conditions of the site, any corrections or improvements needed, if violations were observed, and also a corrective action response timeline. If corrections are required, a compliance timeline is set, and noted on the inspection report.

When an inspection finds a site not in compliance with this chapter, the City requires that the site provide a Corrective Action Response (CAR) documenting that corrections were made by a predetermined due date. Follow-up site visits are made as needed, depending on the severity and compliance history of the site. Depending on the severity and/or reoccurrence of the violations, the inspector may also issue a Notice of Violation, which may include an Administrative Citation. Escalating enforcement actions will be taken as necessary to bring about compliance, as discussed in Section 5.6 and in the Enforcement Response Plan (Appendix B).

5.5.3 Inspection Tracking

Each inspection form, which includes site photos, is stored electronically. The number of inspections performed at each construction site will be tracked in the City's construction inventory spreadsheet to ensure all construction sites in the City's inventory are being inspected at the appropriate frequency. Inspection records will include the following information, at a minimum:

- Site name and location,
- Inspection date(s),
- CAR timeline, and descriptions of inspection comments which must, at a minimum, include rationales for longer or extended compliance times,

- Description of any enforcement actions issued, and
- Resolution of problems noted and date problems were fixed.

Inspection records and related documentation will be made available to RWQCB staff upon request.

5.6 Enforcement

The City enforces storm water requirements at all construction sites in its jurisdiction. Should deficiencies and/or violations not be corrected within the timeline provided by the storm water enforcement officer, the City will implement escalating enforcement actions as outlined within the City's Enforcement Response Plan (Appendix B). Enforcement actions typically include: written notices and warnings, Notices of Violation, Stop Work Orders, and Administrative Citations (fines).

City inspectors seek to achieve a return to compliance within three working days. Depending on the threat to water quality and the amount of time it would reasonably require to address the deficiencies, an alternative compliance timeline will be considered. Additional enforcement actions will be taken as necessary achieve a return to compliance. In cases where the violation cannot be resolved within two weeks, the responsible party shall submit a staged Corrective Action Response Plan along with incremental goals and timelines for completion. Time extensions will be reviewed on a case by case basis provided the request is submitted in writing prior to the expiration of the original compliance timeframe, and the request provides sufficient reasoning for the time extension. The RWQCB will be notified within five days whenever a stop work order and/or when a return to compliance is not achieved within a reasonable timeframe, as determined by the City. The City's Enforcement Response Plan provides additional details on the escalating enforcement actions that will be implemented.