

**Summary of presentation by Water Board staff at the SCVURPPPP Construction  
Site Inspection Training  
Wednesday, October 21, 2009**

Water Board staff shared their perspective on the state of construction sites in the region and showed photos from some recent South Bay inspections. Their observation from the recent inspections is that sites primarily fell into two categories: active and in violation or completely inactive and stabilized with vegetation. That means, as inspectors, we all have to be more aggressive in demanding effective Best Management Practices (BMPs) and housekeeping at active construction sites. Sites that are not in active construction and are permanently stabilized with vegetation can be terminated from coverage under the state's construction stormwater general permit.

Water Board staff's philosophy is to base compliance assessment on the "snapshot" of what they see at the time of inspection, rather than arguing with the discharger about how the site is going to look later that day after sweeping/cleanup. Water Board inspectors issue Notice of Violations (NOVs) for small and large construction site violations, because NOVs get attention and corrective actions, and they serve as a paper trail to justify monetary penalties if a site does not improve sufficiently. The Water Board copies the local agency on the NOVs so that local inspectors can be aware of what Water Board staff have seen and can help address problem sites. Water Board staff appreciate opportunities for cooperative interaction with City inspectors, and if City inspectors request Water Board support, they should go through their municipal stormwater contact with that request. Additionally, it was noted that Water Board has the ability to take monetary enforcement against a city if that city is not adequately overseeing construction activities in compliance with the Municipal Regional Stormwater Permit.

Water Board staff will do outreach this summer on the new construction stormwater general permit, which is going to be a powerful regulatory tool and set a higher standard for the industry statewide."