



Executive Summary of CSEP Pilot Stage I & II

In March of 2005, Stormwater Risk Management, Inc. (SRMI), a private consulting agency, and the Colorado Water Quality Control Division (Division) created The Colorado Stormwater Excellence Program (CSEP) for the State's building industries. The CSEP is the first industry-standardized Environmental Management System (EMS)-based compliance program of its kind in the nation. To best serve the interests of the building industry and the regulatory community, a distinctive blend of public and private partnerships was formed. Private industry funding, voluntary self-policing and minimal regulatory oversight make the CSEP a truly unique program.

Stage I of the CSEP began in March 2005 as a pilot program with five of Colorado's most prominent builders and developers and a high level of Division and MS4 interest. Stage I ended in July 2005 returning very promising results. Consequently, CSEP-Pilot Stage II has been Division-approved for a year-long period beginning in January 2006. In addition to the initial group of participants, Stage II will be available to others within the building industry.

The Associated General Contractors, Colorado Chapter (AGC) is demonstrating its industry leadership by joining the partnership as the first trade association to administer the CSEP to its respective industry sector during Stage II. In addition, a select group of private sponsors who share a common interest in preserving water quality in the State will be providing their support and assisting in promoting the program

The concepts behind the CSEP are rooted in the concepts of the Environmental Management System (EMS) but are intentionally targeted and standardized to promote the goal of widespread construction industry acceptance and ease of use to achieve maximum stormwater quality improvements. Traditional EMS programs address *all* environmental concerns and, to date, are the primary systems that the regulatory community will consider when determining the level of enforcement in an environmental action. EMSs also provide a means for organizations to demonstrate their commitment to the environment as "green construction practices" are becoming widely recognized for their benefits. The greatest challenge in implementing an EMS is that tremendous resources, and in most cases years of effort, can be spent creating them before organizations receive recognition for their accomplishments.

<i>CSEP Principles</i>	
1.	Corporate Commitment
2.	Pollution Prevention & Compliance Assurance
3.	Measurable Results & Continuous Improvement
4.	Accountability Structures
5.	Enabling Systems

The CSEP utilizes a methodology that could potentially revolutionize the way EMSs are implemented. By design, the EMS-based CSEP takes much of the burden off of those participating by pre-packaging its required elements and making them relatively simple and cost-effective for any institution to implement. By inserting the accountability aspect of third-party verification through an outside construction reviewer, along with performance scores and the other CSEP standard systems and tools, immediate results can



be documented and proven to the regulatory community and environmentally conscious individuals or groups.

There are 12 standardized tools within the CSEP that support the five guiding principles fundamental to the program. With assistance from a knowledgeable CSEP administrator or construction reviewer, participants can adopt each of the elements of the program, usually within 90 days or less, and begin experiencing the kind of results that may take others years to realize in a traditional EMS environment. By applying the standardized principles and tools of the EMS-based CSEP, an organization will be well on its way to creating a fully self-directed EMS.

CSEP Pilot Standardized Tools

1. Pre-Construction Project Planning Systems
2. Independent third-party initial inspection
3. Independent third-party follow-up inspection
4. Photo-driven inspection reporting
5. Standardized E-impact TM scoring system
6. 24-hour database, Internet access, storage & retrieval
7. Regulation database (State, Watershed & MS4)
8. Standardized performance reports
9. CSEP-Pilot participation agreements
10. CSEP- Pilot administration
11. Standardized management system plan
12. Standardized training & education

CSEP-Pilot Stage I yielded extremely positive results for those companies adopting its standards and, as a result, proved to the regulatory community the effectiveness of a pre-packaged, industry sector standardized EMS-based program.



PROOF POSITIVE OF CSEP RESULTS

Six categories of performance were measured during the first stage of the Pilot Program using an objective-scoring matrix approved by the Division. The E-Impact™ scoring matrix measurement tool is a five-point system applied to each finding discovered in the field during an initial monthly inspection of a project. A finding can be any item within a project’s stormwater management plan that does not conform to the requirements of the CDPS or presiding MS4 permit. Each finding is then assessed a score from one through five, depending upon its potential environmental impact, and is categorized by BMP type. A follow-up inspection occurs five days following the initial monthly inspection whereby the same items that were noted on the original report are checked to ensure corrective measures took place. If not corrected, the item is then re-scored using the same measurement matrix. It is the objective of a participant to reduce the initial score to a 0 on the follow-up report.

The average combined totals in each of the six measured categories reflect the efforts of four prominent General Contractors and one Property Developer. The data consists of

COMBINED TOTAL RESULTS			
<i>(ALL PARTICIPANTS-STAGE I)</i>			
Category Measured (Considers average for all jobsites)	Baseline	Completion	% Improvement
Average number of initial findings	14.538	7.38	49.24%
Average number of initial “more severe” findings	4.993	.444	91.11%
Average number of uncorrected items found on follow-up	3.139	1.176	62.54%
Average number of “no attempt to correct” items found on follow-up	2.155	.536	75.13%
Average initial E- Impact performance score	38.018	5.34	85.95%
Average follow-up E-Impact performance score	24.056	6.576	72.66%

over 200 individual jobsite inspections on 40 separate projects varying in size and complexity over a four-month period.

Due to the positive results of voluntarily self-policing, a credible scoring system and ancillary tools rooted soundly in a compliance-focused program, the regulatory community is able to get behind the CSEP model and support its participants, even when perfect performance is not always achieved. With compliance improvements in the CSEP-Pilot Stage I exceeding 50% in most measured categories, the program provides great promise for organizations who desire to participate in the CSEP-Pilot Stage II.