

SECTION 2.0**DOUGLAS COUNTY AND CARSON CITY'S CLEAR CREEK STORM WATER
MANAGEMENT PROGRAMS****2.1 Overview**

Prior to the Permit being issued to NDOT, there were two existing storm water management permits and plans in place for Clear Creek. Both Douglas County and Carson City in compliance with their NPDES General Permit for Discharges from Small MS4s filed a Notice of Intent prior to March 10, 2003 and developed individual CCSWMPs. The following is a brief summary of these two programs.

2.2 Douglas County Clear Creek Storm Water Management Program

Douglas County developed a CCSWMP specific to the area of Douglas County, which discharges into Clear Creek, identified as the Carson Area Metropolitan Planning Organization (CAMPO). The program elements of the CCSWMP include the six minimum measures of Public Education and Outreach on Storm Water Impacts, Public Involvement/Participation, Illicit Discharge Detection and Elimination, Construction Site Storm Water Runoff Control, Post Construction Storm Water Management in New Development and Redevelopment, and Pollution Prevention/Good Housekeeping for Municipal Operations.

The Public Education and Outreach on Storm Water Impacts component of the program in Douglas County proposes to develop a website to post the educational materials pertaining to storm water pollution and prevention. The materials on the website will include Best Management Practices (BMPs) available to the public and the business community as well as the minimum BMPs for downslope boundaries. The Douglas County CCSWMP will be presented at the County Commissioners public meeting, allowing opportunity for public comment, as part of the Public Involvement/Participation element.

The Illicit Discharge Detection and Elimination program will include development of storm water system maps to identify possible locations of illicit discharges into Clear Creek. Douglas County will develop a policy to trace and remove illicit discharges. The program will include inspection and sampling requirements when illicit discharges are detected to protect the health of Clear Creek. Illicit discharge information and the proposed policy for enforcement will be posted on the website to inform the public of this element of the storm water program.

The Construction Site Storm Water Runoff Control element of the program follows the procedures in the Douglas County Erosion Control Design Criteria manual. The design manual requires that the erosion controls listed in Nevada's BMP Manual be used at construction sites. The current program of tracking Site Improvement Permits (SIPs) will be used to track erosion control efforts at construction sites.

The Post Construction Storm Water Management in the New Development and Redevelopment aspect of the program falls under the County Development review process, which includes storm water runoff mitigation measures. The new development and redevelopment projects require BMPs to be utilized during the project life. The Douglas County's Design Manual and Master Plan require storm water mitigation measures for new and redevelopment projects which "seek to protect the surface water quality in the County from the effects of growth and urbanization".

The Douglas County CCSWMP Pollution Prevention/Good Housekeeping for Municipal Operations element references the operation and maintenance plan for the CAMPO portion of Clear Creek. This CCSWMP will also follow the existing erosion control and permitting program in Douglas County. Additional information concerning storm water pollution and prevention and maintenance of storm water systems will be posted on the website.

In addition to the six minimum control measures, the Douglas County CCSWMP describes a monitoring plan to include annual sampling of structural controls in the CAMPO area for typical pollutants found in storm water runoff. Monitoring in Clear Creek watershed is an important element in the storm water management program because monitoring data can be used to analyze effectiveness of controls.

2.3 Carson City Clear Creek Storm Water Management Program

Carson City, in compliance with its General MS4 Permit, developed and submitted a SWMP, including a separate CCSWMP, in September 2003. The Carson City CCSWMP is outlined within the context of the SWMP. The CCSWMP addresses the six minimum control measures and BMPs as described in the SWMP. The six minimum control measures are Public Education and Outreach, Public Participation and Involvement, Illicit Discharge Detection and Elimination, Construction Site Runoff Control, Post Construction Runoff Control, and Pollution Prevention/Good Housekeeping.

The Public Education and Outreach element of the Carson City CCSWMP involves distribution of educational materials to inform the public about storm water. An informed public is a key element in preventing damage to the receiving waters. The outreach materials include informative brochures, media materials, interaction with watershed groups, and promotion and development of stream teams. The Clear Creek outreach effort will target the construction and business/industry sectors to prevent sedimentation and post-construction storm water pollution.

The Carson City CCSWMP Public Involvement and Participation component may incorporate forming a MS4 advisory committee including a member from the Clear Creek Advisory Committee, Carson River Advisory Committee, and the Carson River Subconservancy. An additional public involvement and participation element will include holding a public meeting to introduce both the Carson City SWMP and CCSWMP. Furthermore, Carson City will encourage stream or watershed stewardship within the community.

The Illicit Discharge Detection and Elimination program element of the Carson City's CCSWMP is to develop a plan to detect and eliminate illicit discharges. Areas that are likely to have illicit discharges will be identified as well as sanitary sewers overflows or incorrect connections. The Carson City CCSWMP will identify commercial and industrial sites as part of the illicit discharge and detection program element and BMPs will be selected for sites or outfalls with potential non-storm water discharges.

The Construction Site Runoff Control section of the Carson City CCSWMP includes development, implementation, and enforcement of a program to protect Clear Creek from polluted discharges associated with construction site activities. This program includes plan review to insure storm water controls are appropriate, inspector training for site compliance, and development of a clearinghouse for information sharing. To further protect Clear Creek, construction site activity will employ specific BMPs to reduce pollutant discharges to the maximum extent practicable (MEP).

The CCSWMP also includes post development practices to reduce the impact of urbanization on the receiving waters as outlined in the Post-Construction Runoff Control section of Carson City's SWMP. This program will include structural and non-structural BMPs. Educational materials will describe the impacts of new development or redevelopment on the receiving waters in conjunction with general storm water quality information. Carson City will also develop an ordinance to control storm water quality.

The sixth minimum control measure in the Carson City CCSWMP is a Pollution Prevention/Good Housekeeping element. This element will develop an operation and maintenance program to include storm water quality training. The program will address municipal operations that have the greatest potential for contributing pollutants, especially pollutants of concern discharging into Clear Creek and other sensitive waters.