

Cosumnes Community Services District

**National Pollutant Discharge Elimination System
(NPDES) Phase II
Storm Water Management Plan
(SWMP)**



**June 2008
Approved**

Executive Summary

The Cosumnes Community Services District (CSD) has developed a Storm Water Management Program and Storm Water Management Plan (SWMP) to address the quality of storm water runoff that is generated from CSD properties, facilities, and activities. The SWMP addresses a variety of activities that are completed under the CSD's departments and identifies best management practices (BMPs) that will be implemented to reduce or eliminate pollutant storm water discharges to the maximum extent practicable (MEP) in compliance with the Phase II Municipal General National Pollutant Discharge Elimination System (NPDES) permit (Phase II General Permit). The SWMP was submitted to the Central Valley Regional Water Quality Control Board (RWQCB) along with a Notice of Intent (NOI) to formally gain coverage under the Phase II General Permit. The SWMP also indicates the CSD's commitment to protecting storm water quality and describes the storm water quality program that will be implemented. This program includes the following components:

Public Education and Outreach- Provides for the education of the general public and internal staff regarding storm water quality.

Public Involvement and Participation- Establishes opportunities to for the public to participate in the development of the CSD's Storm Water Program and implementation of pollution prevention measures.

Illicit Discharge- Establishes a program to identify and eliminate sources of pollutant illegal discharges into the CSD's storm drainage system.

Construction Activities- Establishes a construction related storm water pollution prevention program which includes the identification and implementation of BMPs during construction activities.

New Development or Redevelopment- Establishes new development and redevelopment standards for incorporation of storm water pollution removal devices into new CSD projects or into the redevelopment of existing facilities or properties.

Municipal Operations- Requires the CSD to implement storm water quality measures while conducting municipal operations, including addressing herbicide and pesticide application while conducting vegetation management.

Each of the seven storm water program components have quantifiable measurable goals identified that will be utilized to determine the effectiveness of the program on

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reducing storm water pollution and achieving compliance with the Phase II General Permit. The measurable goals will be the basis for developing the Annual Report and are developed for each year of SWMP implementation for the entire five year life cycle of the SWMP.

Many of the components of the CSD's storm water program are complimentary to the CSD's existing activities and programs. Thus the program will rely upon leveraging existing CSD activities and programs to develop a cost effective means to achieving the objectives of the Phase II Permit. The CSD has been and will continue to be committed to being good stewards of the environment and committed to implementing a successful storm water management program and SWMP.

Certification Sheet

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for the gathering of the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By:



**Donna Hansen
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12/18/08

Date

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Abbreviations and Acronyms

BMP	Best Management Practice
CSD	Community Services District
EPA	Environmental Protection Agency
MEP	Maximum Extent Practicable
MS4	Municipal Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System (NPDES)
RWQCB	Regional Water Quality Control Board
SWMP	Storm Water Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board

I Introduction

The Cosumnes Community Services District (CSD) is a special district formed to provide two main public services for the Elk Grove community – fire and parks and recreation services. The Elk Grove Fire District and the Elk Grove Recreation and Park District merged in 1985 to form the CSD. The CSD's Fire and Parks and Recreation Departments service of all of the City of Elk Grove and beyond. In November 2006, the Elk Grove CSD merged with the Galt Fire Department to expand and create the Cosumnes CSD. The CSD is a separate entity from the City of Elk Grove and operates over 70 parks, six fire stations, a fire training facility, two community pools, a maintenance yard, and administrative buildings and owns other properties that are currently not in use but are planned for future development. The CSD currently encompasses approximately 1009 acres and owns storm drainage systems which discharge into the City of Elk Grove's MS4 facility or into various named and unnamed drainages.

The CSD has developed this Storm Water Management Plan (SWMP) to comply with the Phase II General Permit for discharging storm water to waters of the State. The intent of the SWMP is to reduce the discharge of pollutants in storm water to the maximum extent practicable, and in a manner designed to achieve compliance with water quality standards and objectives, and effectively prohibit non-storm water discharges into the municipal storm drain system and watercourses within the CSD's jurisdictions. Copies of this SWMP can be found on the CSD's web site or can be obtained in the main office of the CSD.

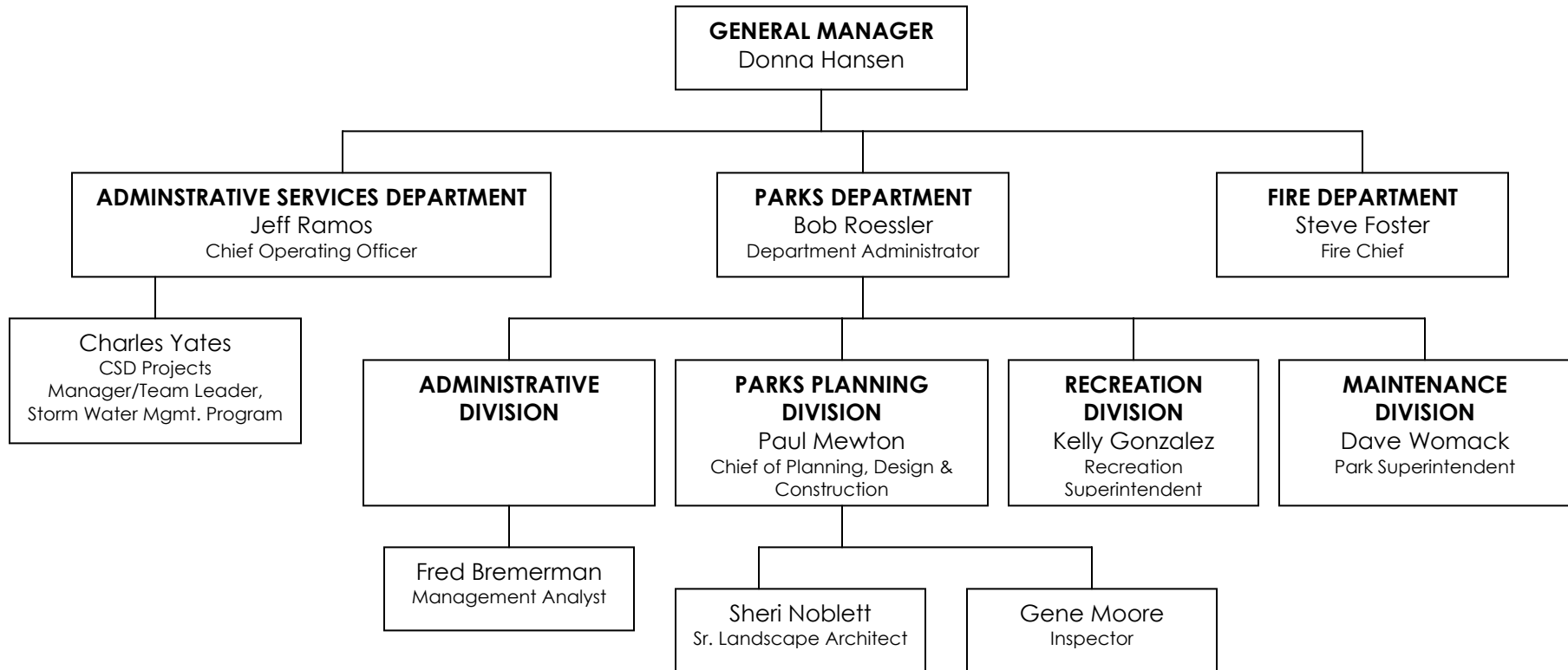
The CSD is governed by a Board of Directors. The Board is responsible for formulating and approving policies for the operation, control, administration, and planning of facilities and activities. The five members of the Board are elected by the public to four-year staggered terms. At the beginning of each year, the Board selects from its members a President and Vice-President to serve during the ensuing year. The President presides over meetings and signs contracts and documents authorized by the Board. The Vice-President presides over meetings and performs other duties in the absence of the President. The SWMP was approved by the CSD Board for implementation and for the commitment of adequate resources.

Daily operations of the CSD are managed by the Administrative Services Department. This department provides guidance and support to the Board of Directors and various CSD staff. Staff members in the administrative services department are responsible for overseeing the District's annual budget, managing human resources, implementing District planning, maintaining District facilities, coordinating District-wide information systems, managing public information/media relations for all three departments, and administering the District-wide Landscape

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and Lighting (L & L) Assessment District. An organizational chart is included in Figure 1-1 and depicts the relationship of CSD staff and the CSD Board. Overall implementation of the SWMP and compliance with the Municipal Permit will be the responsibility of the CSD's General Manager. The CSD's General Manager operates within this department and has the responsibility of administering the programs and policies developed by the Board of Directors and overseeing the operations of all three departments within the CSD. However, representatives from both the Fire Department and Parks and Recreation will have assigned SWMP implementation as identified in this document.

Figure 1-1. Cosumnes Community Services District Organization Chart



1.1 Regulatory Setting

In 1972 the Federal Clean Water Act (CWA) was amended to provide that the discharge of pollutants to waters of the United States (US) from any point sources is unlawful unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The 1987 amendments to the CWA added section 402 (p) which established the framework for regulating storm water discharges under an NPDES program. In 1990, the US Environmental Protection Agency (EPA) developed regulations for permitting storm water discharges from industrial sites, construction sites (disturbing 5 acres or more of soil) and from municipal separate storm sewer systems (MS4 facilities) serving a population of 100,000 people or more. This program became known as the Phase I NPDES program. On December 8, 1999, the US EPA established a new set of regulations, known as the Phase II NPDES program, requiring permits for storm water discharges from small MS4s and from construction sites disturbing between one and five acres of land. Within the State of California, the US EPA delegated the authority for day to day implementation of the NPDES program to the State. Within the State of California the NPDES programs are administered by the State Water Resources Control Board and the nine Regional Water Quality Control Boards. Phase I municipalities have individual NPDES permits and Phase II municipalities obtain NPDES permit coverage by filing underneath the NPDES General Permit No. CAS000004, Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Small MS4 General Permit). A copy of this General Permit is located in Appendix A.

The Phase II General Permit requires municipalities with smaller populations to develop and implement a storm water management program and file for coverage under the Phase II Permit by submitting a Notice of Intent and a Storm Water Management Plan (SWMP). The SWMP is subject to public review and must be approved by the Regional Board.

The Phase II General Permit identified traditional MS4s and non-traditional MS4s. The CSD is considered a non-traditional MS4 because it discharges into a Phase I MS4 facility and serves a large population in an area that experiences "high growth". An area is determined to be a "high growth" area if it grew by more than 25 percent between 1990 and 2000. The Phase II Permit requires the CSD to implement Best Management Practices (BMPs) that reduce pollutants in storm water discharges to the "maximum extent practicable" (MEP). MEP is a technology based standard defined by CWA section 402 (p)(3)(B)(iii). Technology based standards establish the level of pollutant reduction that a discharger must achieve. MEP is primarily achieved by establishing a pollution prevention program and by implementing source control measures to control the discharge of pollutants. MEP may also be achieved by implementing structural and treatment controls in combination with

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pollution prevention practices and sources control measures. In addition to complying with the MEP standard, the Permit also requires the CSD to comply with receiving water limitations. Per the requirements of the Permit and in order for the CSD to demonstrate that they will comply with the MEP standard and comply with receiving water limitations the following components have been addressed in this SWMP:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge
- Construction Activities
- New Development or Redevelopment
- Municipal Operations- Including a herbicide/pesticide management program.

To gain coverage under the Small MS4 General Permit, the CSD must submit a Notice of Intent (NOI), the appropriate fee, along with their SWMP to the Regional Board. Submittal of the NOI and SWMP do not automatically result in Permit coverage. Prior to obtaining permit coverage the SWMP is subjected to a 60 day public review period and the Regional Board must also determine that the SWMP meets the MEP criteria.

1.2 Legal Authority

The CSD is considered a special district that is defined by State law as “any agency of the state for the local performance of governmental or proprietary functions with limited boundaries.” (Government Code § 16271). The CSD has four characteristics which distinguish it as a service district: 1. it is a form of government; 2. it is governed by a board; 3. it provides services and facilities; and 4. it has defined boundaries. The CSD can enter into contracts, employ workers, purchase property, issue debt, impose taxes, levy assessments, and have the authority to pass fire ordinances and establish rules for their park and recreation facilities. The CSD Board is the governing authority of the CSD and approves all such actions that are subject to public comment including the implementation of this SWMP.

1.3 CSD Facility Description

The CSD is located in Sacramento County in the City of Elk Grove, and does not have a contiguous boundary. Table 1-1 provides a listing of all CSD facilities (existing and proposed) and Figure 1-2 provides a map and Appendix B includes a full size edition of the same map of all of the facilities which include the following:

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- Parks- the CSD owns, operates, and maintains over 70 park facilities. Including a recently purchased golf course.
- Fire Stations-the CSD owns, operates and maintains 6 fire stations and has 2 proposed facilities that are currently undergoing design.
- Fire Training Center- the CSD's Fire Department operates a full service fire training center.
- Maintenance Yard- the CSD has 2 maintenance and operational yards that are utilized to service and store equipment and to make general repairs. One of the yards is located at the CSD's administrative building that is located at the
- CSD Administration Buildings- the CSD operated 2 administration buildings.
- Community Pools- the CSD owns and operates three community pool facilities which are open to the public.
- Fleet maintenance facility.

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Table 1-1. CSD Facilities		
Existing Parks & Trails		
ID#	Property Name	Location
1	Amundson Park	Heritage Hill Drive
2	Baker Park	8800 Elk Grove Blvd/Williamson Dr.
3	Bartholomew Park	9292 Lake Point Dr./Renwick Dr
4	Batey Park	6820 Seasons Drive
5	Beeman Park	8830 Sharkey Ave
6	Berens Park	10144 Sonoma Creek Dr./Mosher Rd
7	Betschart Park	5666 Adobe Springs/Bambridge
8	Bradford Park	9894 Spring View Wy/Gold Autumn Wy
9	Camden Creek Park	Bond Rd/Elk Grove-Florin
10	Camden Greenbelt	Camden Dr
11	Case Park	5423 Laguna Park Dr./Red Dog Cr
12	Castello Park	8830 El Toreador Way
13	Caterino Park	4101 Windy Cove Dr
14	Colton Park	9410 Laguna Springs Dr
15	Davis Park	8908 Laguna Star Dr
16	Del Meyer Park	Elk Grove-Florin Rd
17	Dillard Ranch Park	9857 Dillard Rd
18	Don Nottoli Park	10050 East Taron Dr
19	Edie MacDonald Park	8601 Spring Azure Way
20	Ehrhardt Oaks Park	4800 Percheron Dr.
21	Elk Grove Park	9950 Elk Grove-Florin Rd
22	Emerald Lakes Golf Course	10651 E. Stockton Blvd
23	Fales Park (Linear)	Power Inn Road
24	Feickert Park	9310 Emerald Vista Dr
25	Fite Park	4312 Careyback Ave/Warmsprings
26	Fleming Park	9275 Salmon Creek Dr
27	Foulks Park	9433 Trenholm Dr
28	Gage Park	8888 Silverberry Ave
29	Gates Park	9381 Mainline Dr/Elk Grove Blvd
30	Guttridge Park	8201 Laguna Brook Way
31	Harris Ranch	4515 Thira Way
32	Harris Ranch Trail	Thira Way

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33	Hawkins Park	2301 Bastona Dr/Harbor Point Dr
34	Henderson Park	9930 West Taron Dr
35	Herburger Park	6811 Peninsula Way
36	Houde Park	9759 Club Park Dr
37	Hrepich Park	8620 Black Kite Dr.
38	Jack Hill Park	9380 Porto Rosa Dr
39	Johnson Park	9645 Lakepoint Dr
40	Johnston Park	9925 Ferragamo Way
41	Jones Park	8840 Shasta Lily Dr
42	Jungkeit Park	9760 Fire Poppy Rd
43	Keema Park	9720 Summer Glen Way
44	King Park	9328 Keefe Dr
45	Kloss Park	6501 Laguna Park Dr
46	Kramer Park	6135 Orchard View Dr
47	Laguna Community Park	9014 Bruceville Rd/Big Horn Blvd
48	Lawrence Park Park	9369 Fassett Wy/Babson Dr
49	Lawson Park	2507 Renwick Ave/Harbor Point Dr
50	LCP – WCAC Turf Park	9014 Bruceville Rd/Big Horn Blvd
51	Lewis Park	9615 Black Swan/Elk Grove Blvd
52	Lichtenberger Park	6615 Kilconnel Dr/Laguna Park Dr
53	Lippincott Park	3230 Renwick Dr
54	Lombardi Park	8830 Garrity Dr./Blackman Wy
55	Luttig Park	9710 Toscano Dr.
56	Machado Dairy Park	10394 Franklin High Rd.
57	McConnell Park	10081 Hampton Oak Dr
58	Mendoza Park	9001 Polhemus Dr
59	Miles Park	9601 Mainline Dr/Nordman Way
60	Miwok Park	9344 Village Tree/Big Horn Blvd
61	Mix Park	8770 Goldy Glen Way
62	Oneto Park	9477 Hidden Hollow Ct/Big Timber Dr
63	Laguana Creek Greenbelt	Laguna Park Dr
64	Pedersen Park	5520 Laguna Oaks Dr/Laguna Woods
65	Perez Park	2326 Sandy Beach Way/Maritime Dr
66	Perry Ranch Park	9220 Brown Road
67	Pinkerton Park	Lewis Stein Rd/W Stockton Blvd

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68	Poppy Ridge Park	Poppy Ridge Rd.
69	Rau Park	8795 Elk Grove Florin Rd/Sheldon Rd
70	Rose Park	8620 Frye Cr/Deepdale Wy
71	Russell Park	9136 Grove St/Mardelle Way
72	Simpson Park	9565 Crisswell Dr
73	Smedberg Park	9854 Emerald Park Dr/Grouse Meadow Dr
74	Strong Park	9580 Bay Point Wy/Elk Grove Blvd
75	Town Square Park	3020 Renwick Avenue
76	Underwood Park	8751 Bond Rd/Elk Grove-Florin
77	Van Doren Park	9100 Neponset Dr
78	Wackman Park	5851 Laguna Quail Way
79	Whitehouse Creek Parkway	Between Mix Park and Camden Greenbelt
80	Willard Park	9650 Cresleigh Parkway/Blue Poppy Dr
81	Womack Park	9340 Castleview Dr
82	Zehnder Park	9212 Edisto Way/Neosho
83	Zimbelman Park	9191 Big Horn Blvd

Future Parks

ID#	Property Name	Location
1	Backer Park	10400 Stathos Drive
2	Bartholomew Sports Park	Whitelock Pkwy & Franklin High Rd
3	Buscher Park	Willard Pky/Matina Dr
4	George Park	South of Franklin Blvd/Bilby Rd
5	Karamanos Park	8671 Magnolia Hill Dr.
6	Kunsting Park	Wild Orchid Way
7	Morse Park	5850 Bellaterra Drive
8	Emerald Park Parksit	Elk Ridge Way
9	Parksite #8 - Fieldstone	Mainline Dr
10	Parksite #9 – Crooked Creek	Crooked Creek Estates
11	Parksite B - Sheldon Place	Sheldon Place Drive/Todd Hollow Way
12	Parksite C – Arcadian Village	Bow St.
13	Schauer Park	10181 Frank Greg Way
14	Stephenson Park	Poppy Ridge/Gilliam Meadows
15	Parksite A - Vista Creek Park	Calvine Rd/Waterman Rd
16	Wright Park	Bond Rd/Waterman Rd

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Updates		
17	Dillard Ranch Park	9857 Dillard Rd
18	Poppy Ridge Park	Poppy Ridge Rd.
Administration		
ID#	Property Name	Location
1	CSD Administration	8820 Elk Grove Blvd
2	Town Hall	8380 Laguna Palms Way
Fire Stations		
ID#	Property Name	Location
71	Fire Station No. 71	8812 Elk Grove Blvd
72	Fire Station No. 72	10035 Atkins Drive
73	Fire Station No. 73	9607 Bond Road
74	Fire Station No. 74	6501 Laguna Park Dr
72	Fire Station No. 75	2300 Maritime Drive
76	Fire Station No. 76	8545 Sheldon Road
77	Fire Station No. 77 (Proposed)	Poppy Ridge Road
78	Fire Station No. 78 (Proposed)	Kammerer Road
99	William Perry Schulze Fire Training Facility	10573 E. Stockton Blvd.
100	Logistics Support	Hood Franklin Road
Galt Fire Stations		
ID#	Property Name	Location
45	Fire Station No. 45	229 5 th Street
46	Fire Station No. 46	1050 Walnut Ave

Figure 1-2. Map of Facilities.

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The CSD operates drainage facilities that were primarily designed to transport storm water runoff from the site. These drainages systems either discharge into the City of Elk Grove's storm drainage system or directly to a receiving water body. The CSD's drainage system consists of structural components (culverts, headwall, inlets, outlets, and energy dissipation, etc.) or relies upon surface drainage systems (dikes, berms, swales, etc.). A few of the new park facilities also include storm water treatment devices (detention basins, infiltrations basins, biofiltration devices, etc.). Through implementation of this SWMP, the CSD will establish standard maintenance and operational procedures in relation to the storm drainage system. These procedures will also address maintaining treatment BMPs.

The drainage system at each site is maintained by CSD maintenance staff. Maintenance activities include removal of sediment, trash, debris, unclogging of pipes and reestablishing grade in ditches. For additional maintenance activities please refer to Section 8.0 Municipal Operations.

1.4 Climate

The climate in Elk Grove is typical of the Central Valley. Temperatures range from an average winter low of 39 F to average summer highs in July of 92 F. The area averages 17.1 inches of precipitation per year. The rainy season for the area is typically between October and May of each year and 96% of the Annual Rain falls within this time period. The summers are typically warm and dry and typically little rain fall occurs during the summer months.

1.5 Receiving Waters and Beneficial Uses

The CSD facilities are spread out over approximately 106 square miles and discharge to a variety of unnamed natural drainages and man made drainages that ultimately discharge to the Sacramento River. The CSD jurisdictional boundaries are located in the Valley American Hydrologic Unit in the Morrison Creek Hydrologic Area. The watershed area is includes approximately 58,627 acres and contains three named receiving waters: Laguna Creek, Elk Grove Creek and a manmade drainage that discharges to Stone Lake. Included in Figure 1-3 is a topographic map identifying all of the receiving waters within the CSD boundaries. Below are the beneficial uses assigned to each of these receiving waters by the Regional Water Quality Controls Board's Central Valley Basin Plan. Beneficial use designations include both human uses and plant and animal uses:

Municipal and Domestic Supply (MUN)

Uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.

Agricultural Supply (AGR)

Uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering or support of vegetation for range grazing.

Industrial Process Supply (PROC)

Uses of water for industrial activities that depend primarily on water quality (i.e., waters used for manufacturing, food processing, etc.).

Water Contact Recreation (REC-1)

Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing or use of natural hot springs.

Non-Contact Water Recreation (REC-2)

Uses of water for recreational activities including proximity to water, but where there is generally no body contact with water, nor any likelihood of ingestion of water. These uses include, but are not limited, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.

Commercial and Sport Fishing (COMM)

Uses of water for commercial or recreational collection of fish, shellfish, or other organisms, including but not limited to uses involving organisms intended for human consumption or bait purposes.

Warm Freshwater Habitat (WARM)

Uses of water that support warm water ecosystems including but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.

Cold Freshwater Habitat (COLD)

Uses of water that support cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.

Wildlife Habitat (WILD)

Uses of water that support estuarine ecosystems including but not limited to, preservation and enhancement of terrestrial habitats or wetlands, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

Figure 1-3. Topo Map.

1.6 Impaired Water Bodies

The Federal CWA recognizes that water bodies provide valuable benefits, such as fishing, swimming, drinking water and habitat for plant and animal species. Waters that exceed the water quality standards necessary to sustain any specific beneficial use are considered "impaired". The CWA Section 303 (d) requires all impaired water bodies to be identified on a list. This list is commonly referred to as the 303 (d) List. For each water body identified on the 303 (d) list the State in which it is located must develop a Total Maximum Daily Loading (TMDL). A TMDL is a maximum daily pollutant loading allocation that is established for the pollutant or stressor that caused the impairment. In essence, a TMDL establishes the maximum loading of a specific pollutant or stressor that a water body can handle while reestablishing its beneficial uses. The pollutant loading allocation established by the TMDL is distributed amongst the discharges within the watershed proportional to the amount of runoff a discharger contributes to the water body. The only water body within the CSD's jurisdictional limits that is identified on the 303 (d) list is Elk Grove Creek which has been identified to be impaired by diazinon. The CSD does not allow the use of diazinon at any of its facilities or parks.

1.7 Pollutants of Concern and Sources of Pollutants

Pollutants typically found in storm water in urban areas include sediments, nutrients, pathogens, oxygen demanding substances, petroleum hydrocarbons, heavy metals, floatables, polycyclic aromatic hydrocarbons (PAHs), trash, pesticides, and herbicides. All of the pollutants have the potential to pollute storm water runoff generated from CSD facilities and activities if not properly addressed. Pollutants that will be of specific concern for the CSD are pesticides, herbicides and trash.

Some of the most common sources of pollution in urban runoff include: Urban activities such as landscape maintenance, herbicide pesticide use, vehicle use and maintenance, outdoor material storage, construction, and illegal discharges. Impervious surfaces such as streets, rooftops, and parking lots. Impervious surfaces increase the volume and velocity of storm water discharges and serve as a collector for pollutants.

Hydromodification concerns will be addressed through post construction BMP implementation. Effort will be made on new projects to not increase post construction storm water runoff velocities and frequencies over pre-construction rates. Due to the minimal amount of impervious surface associate with new park construction it is not anticipated that hydromodification will occur as the result of new park construction.

1.8 Statement of Funding Adequacy

The CSD Board has committed adequate resources to the implementation the Storm Water Management Program and the requirements of the SWMP. The CSD receives funding from a variety of sources and will allocate these funds on a yearly basis to implement the various commitments made in this SWMP. For example during the 2005-2006 fiscal year, the CSD budget was approximately \$69 million. This budget funded the operations of the Fire, Parks and Recreation and Administrative Services Departments. Funds identified in the CSD budget are generated from the Landscaping and Lighting Assessment District, developer impact fees, and the General Fund. The majority of the money required for the implementation of the Storm Water Management Program will be allocated from the Landscaping and Lighting Assessment Fees. Funding for new treatment BMPs associated with the construction of new parks or the major redevelopment of an existing park will be generated from developer impact fees.

II CSD Storm Water Program

2.1 NPDES Compliance Team

The CSD will designate a NPDES Compliance Team that will be composed of key staff that represents each of the key functional areas: Administration, Parks & Recreation, and Fire to oversee and manage the development and implementation of the CSD's Storm Water Program and SWMP. This team will facilitate SWMP implementation and will ensure compliance is achieved and measurable goals are met. As well, this team will evaluate measurable goals and objectives to identify program elements that required modification or improvement.

2.2 Single Focal Point of Contract

All though the NPDES Compliance Team will be an important component to the CSD achieving overall compliance the below individual will be the single point of contact for the Storm Water Management Program and for regulatory inquiries and responses.

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The NPDES Compliance Team will hold regular meetings as needed to facilitate implementation of the requirements and measurable goals identified in this SWMP.

2.3 Participation in the Sacramento Stormwater Quality Partnership (SSQP)

The SSQP is composed of Sacramento area public agencies including the County of Sacramento, and the Cities of Sacramento, Citrus Heights, Elk Grove, Folsom, Galt and Rancho Cordova. The goal of the SSQP is to synergize efforts and resources to effectively control storm water pollution within the Sacramento Areas. The SSQP has developed many resources related to storm water pollution prevention that the CSD can leverage and add to. The SSQP also serves as a forum for municipalities to discuss common issues and to identify mechanisms for sharing resources. The CSD believes that there are many benefits to participating in the SSQP including learning

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from others experiences achieving NPDES compliance. However, the CSD's participation in the SSQP will be an informal relationship that may be re-evaluated at a later date.

2.4 Coordination with the City of Elk Grove

The CSD recognizes the importance of a coordinated approach when addressing water quality issues with the watershed. To achieve this coordination, the CSD will initiate formal and informal coordination activities with the City of Elk Grove. On a formal basis the CSD will invite the City of Elk Grove to attend two CSD/City watershed coordination meetings per each reporting year. These meetings will be utilized to facilitate resolution to commonly shared storm water issues and for both parties to share storm water quality related information. On an informal basis the CSD will keep the City of Elk Grove sufficiently informed with the programs and activities relevant to the storm water quality issues within the watershed.

III Public Education and Outreach

The Phase II General Permit requires the CSD to include a public education and outreach component into their Storm Water Program. This component will educate the public within its permitted jurisdiction about the importance of the storm water program and the public's role in the storm water program. The Phase II General Permit requires the CSD to distribute educational materials to the communities or conduct other equivalent outreach activities about the impact of storm water pollution on the water quality of receiving waters. The Phase II General Permit also states that for non-traditional Permittees, the employee user population may serve as the "public" to target for outreach and involvement.

3.1 CSD Public Education and Outreach Program

Due to the uniqueness of the CSD's jurisdictional control and the fact that the CSD is considered a nontraditional Permittee by the Phase II General Permit, the public that will be targeted for storm water related public education and outreach are those persons who utilize the CSD's parks, recreational facilities as well those members of the public that come into contact with the Fire Department. The individual responsible for implementing the Public Education and Outreach Component of this SWMP is:

Steve Capps
Public Information Officer
8820 Elk Grove Boulevard, Suite 1
Elk Grove, California 95624
(916) 405-7176
scapps@csdparks.com

The CSD has many existing CSD sponsored activities that will be leveraged to develop a forum for educating the public regarding storm water pollution prevention. These existing activities include:

Farmers' Market- A community event that is held during the months of May through August in the Elk Grove Regional Park. At the Farmer's Market the CSD will distribute educational material.

Western Festival- The Western Festival is an annual event where the CSD will disseminate storm water pollution prevention information to the public.

Family Fun Night- The CSD schedules free family events throughout the CSD park system. At these events storm water educational material will be available for the public.

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Harvest Festival- The Harvest Festival takes place in October of every year. Storm water pollution prevention information and public participation activities will be incorporated in the Harvest Festival activities.

Roving Concert Series- The CSD sponsors free musical events for the public at various parks throughout the CSD park system. Storm water pollution prevention information can be disseminated at these events to reach a large diverse public audience.

WOOF Events- We Offer Off-leash Fun (WOOF) is a volunteer advisory committee that hold events for Elk Grove dog parks. WOOF can be utilized to disseminate information to pet owners regarding proper disposal of pet waste.

3.2 Public Education and Outreach Measurable Goals

The measurable goals identified in Table 3-1 may be modified through annual evaluation of the program and will be reported on the CSD’s Annual Report.

Table 3-1. Public Education and Outreach Measurable Goals.			
	Goal Description	Objective of Goal	Year Implemented
3A	Develop a training plan for park and recreation staff. The plan should include identifying key staff that requires training, developing a training schedule, and developing curriculum.	The objective of this goal is to develop a plan that will facilitate providing CSD staff with the knowledge they require to ensure their areas of responsibility and activities that they conduct are in compliance with the requirements of the Phase II General Permit and that they implement appropriate water pollution prevention measures at all times.	Year 1
3B	Develop a Storm Water Pollution Prevention Slogan.	Have a slogan that is concise and clearly explains to the public that can be incorporated into various media mechanisms that all ready exist.	Year 1
3C	Develop storm water pollution prevention materials, such as brochures, handouts, materials, etc...	To have educational material and pollution prevention reminders to handout to members of the public	Year 1
3D	Develop a storm water knowledge survey to	To determine the public’s level of storm water pollution prevention	Year 1 and 2

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Table 3-1. Public Education and Outreach Measurable Goals.			
	Goal Description	Objective of Goal	Year Implemented
	informally give to members of the public.	knowledge. The results from the survey can be utilized to determine future public education topics and targeted audiences.	
3E	Train 50% of all staff and any new staff identified in the internal training program that will be developed during year 1 of the permit coverage.	To ensure 100% of staff responsible for implementing and/or complying the SWMP and Permit are trained appropriate	Year 2
3F	Develop a storm water pollution prevention booth.	To have the booth that can be mobilized to a multitude of CSD events that can serve as a forum for educating the public	Year 2
3G	Dedicate one of the Farmer's Market Nights to Storm Water Pollution Prevention	Highlight the importance of storm water pollution prevention by singling it out as a special night of consideration at the Farmers' Market.	Year 2
3H	Train the remaining 50% of staff that did not receive storm water quality training the previous year.	To ensure all relevant staff receive appropriate storm water training to ensure daily activities are in compliance with the Phase II General Permit, the SWMP and implement storm water pollution prevention activities during daily activities.	Year 2
3I	Develop storm water pollution prevention curriculum to include into the CSD's after school and child education programs.	The objective of this goal is to develop a standard set up storm water pollution prevention curriculum that can be integrated into the various CSD sponsored children programs.	Year 3
3J	Integrate storm water pollution prevention curriculum into existing children programs.	The objective of this goal is to educate the youngest members of the public regarding storm water pollution prevention to begin a cultural change in the way society views storm water quality.	Year 3-5
3K	Develop and implement another storm water	To determine if the public's knowledge has increased over the	Year 5

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Table 3-1. Public Education and Outreach Measurable Goals.			
	Goal Description	Objective of Goal	Year Implemented
	knowledge public survey.	life span of the Public Education and Outreach Program to determine whether or not it was effective in increasing the public's storm water pollution prevention knowledge.	

IV Public Involvement and Participation Program

The Phase II General Permit requires that the CSD comply with State and Local public notification requirements when implementing the public involvement program.

4.1 CSD Public Involvement Program

The CSD will utilize existing public information mechanisms such as the Friends of the CSD New Letter, the CSD's website and home mailings to notify the public that the SWMP is available for review. Notices will also include information for the public to learn about the primary objective of reducing storm water pollution at all CSD parks and facilities. The CSD will coordinate with in-house legal counsel to ensure all appropriate public notifications are made in a timely manner. In addition, the RWQCB will also post the SWMP on their web site to solicit formal public review and comment prior to approval of the SWMP. Through formal and informal public comment and through implementation of the measurable goals identified in Section 3 for Public Education and Outreach, the CSD will ensure the Public Involvement Program is implemented in compliance with the Phase II General Permit.

The individual responsible for implementing the public involvement and participation program for the CSD's Storm Water Management Program is identified below:

**Steve Capps
Public Information Officer
8820 Elk Grove Boulevard, Suite 1
Elk Grove, California 95624
(916) 405-7176
stevecapps@csdparks.com**

4.2 Public Involvement and Participation Measurable Goals

To ensure compliance with the Phase II General Permit's requirements for Public Involvement and Participation the Measurable Goals identified in Table 4-1 will be implemented and reported upon in the Annual Report.

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Table 4-1. Public Involvement and Participation Program.			
	Goal Description	Objective of Goal	Year Implemented
4A	Post a notification on the CSDs website regarding the CSD's new SWMP.	To inform the public of the development and approval process of the SWMP.	Year 1
4B	Post a notice on the CSD's website that the Annual Report is available for review.	To inform the public of the progress made in the implementation of the CSD's SWMP during the first year.	Year 1
4C	Post general information regarding the Storm Water Management Program on the CSD's website.	To provide the public with pertinent information such as contact information, opportunities for public participation, and information regarding storm water pollution prevention.	Year 1
4D	Post a notice on the CSD's website that the Annual Report is available for review.	To inform the public of the progress made in the implementation of the CSD's SWMP during the second year.	Year 2
4E	Post general information regarding the Storm Water Management Program on the CSD's website.	To provide the public with pertinent information such as contact information, opportunities for public participation, and information regarding storm water pollution prevention.	Year 2
4F	Post a notice on the CSD's website that the Annual Report is available for review.	To inform the public of the progress made in the implementation of the CSD's SWMP during the third year.	Year 3
4G	Post general information regarding the Storm Water Management Program on the CSD's website.	To provide the public with pertinent information such as contact information, opportunities for public participation, and information regarding storm water pollution prevention.	Year 3
4H	Post a notice on the CSD's website that the Annual Report is available for review.	To inform the public of the progress made in the implementation of the CSD's SWMP during the fourth year.	Year 4
4I	Post general information regarding the Storm Water Management Program on the CSD's website.	To provide the public with pertinent information such as contact information, opportunities for public participation, and information regarding storm water	Year 4

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Table 4-1. Public Involvement and Participation Program.			
	Goal Description	Objective of Goal	Year Implemented
		pollution prevention.	
4J	Post a notice on the CSD's website that the Annual Report is available for review.	To inform the public of the progress made in the implementation of the CSD's SWMP during the first year.	Year 5
4K	Post general information regarding the Storm Water Management Program on the CSD's website.	To provide the public with pertinent information such as contact information, opportunities for public participation, and information regarding storm water pollution prevention.	Year 5

V Illicit Discharge Program

The Phase II General Permit requires the CSD to develop a program for detecting and eliminating illegal storm water discharges and illicit storm drain connections. The CSD facilities that are most at risk for illegal storm water discharges or the dumping of materials that have the potential to cause storm water pollution are the parks.

The Phase II General Permit requires the CSD to implement the following requirements to detect and eliminate illegal discharges and illicit connections”

- Develop and enforce a program to detect and eliminate illicit discharges.
- Develop a storm sewer map, showing the locations of outfalls and the names and locations of all water of the U.S. that receive storm water from those outfalls.
- Effectively prohibit illegal discharges through a regulatory mechanism non-storm water discharges, into the MS4 and implement appropriate enforcement actions and procedures.
- Develop and maintain a plan to detect and address nonstorm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit.
- Inform the public and employees of the hazards that are generally associated with illegal discharges and improper disposal of waste or pollutant materials.
- Address the following categories of non-storm water discharges only where the are identified as a significant contributor to pollutants in the MS4.
 1. water line flushing
 2. landscape irrigation
 3. diverted stream flows
 4. rising ground waters
 5. uncontaminated ground water infiltration to the MS4 system
 6. uncontaminated pumped ground water
 7. discharges from potable water sources
 8. foundation drains
 9. air conditioning condensation
 10. irrigation waters
 11. springs
 12. water from crawl space pumps
 13. footing drains
 14. lawn watering
 15. individual residential car washing
 16. flows from riparian habitats and wetlands
 17. dechlorinated swimming pool discharges

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Discharges from fire fighting activities are excluded from the effective prohibition against nonstorm water discharges and need only be addressed where they are identified as significant sources of pollutants to waters of the U.S.

5.1 Illicit Discharge Program

To assist with eliminating illegal discharges and illicit connections, the CSD will map all existing storm drainage facilities and will identify the receiving water that each storm drain system discharges into. The CSD has existing programs and public activities such as the Partners for Parks Program that solicit help from the public to notify the CSD of problems that may occur at the parks. This program can be leveraged to also include educating the public regarding the dumping of pollutant materials so they can also help to identify when there is a problem.

The Phase II General Permit also requires the CSD to develop a mechanism for prohibiting the dumping of illegal or pollutant materials and non-authorized connections to the CSD's storm drainage system. The CSD's legal authority is limited; however the CSD does establish rules by which the public must abide by to utilize CSD parks and facilities. The CSD is also under the City of Elk Grove's Police Department's jurisdiction which can be called upon to address illegal activities.

The individual responsible for the Illegal Discharge Program is

**Dave Womack
Director of Maintenance
8820 Elk Grove Boulevard, Suite 1
Elk Grove, California 95624
(916) 405-5643**

5.2 Measurable Goals

The measurable goals identified below in conjunction with measurable goals identified in both Sections 3 and 4 will help to ensure that illegal connections and discharges are eliminated to the MEP. Table 5-1 identifies measurable goals for the Illicit Discharge and Illicit Connection program that will be implemented over a five year period.

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Table 5-1. Illegal Discharge Program Measurable Goals.			
	Goal Description	Objective of Goal	Year Implemented
5A	Conduct an inspection of each CSD facility to identify facilities or parks that are at high risk for illegal dumping or discharges.	Through the identification facilities and parks that have a high illegal discharge and dumping risk the CSD will be able to use this information to develop a comprehensive plan for eliminating them.	Year 1
5B	Complete a storm drain inventory at each CSD facility per the Phase II General Permit requirements.	The storm drain inventory will provide the CSD with information that will be instrumental in identifying illegal discharges and connections.	Year 1
5C	Develop an illegal discharge and connection elimination plan.	Utilizing the information accumulated during the implementation of Goals 5A and B, the CSD will be able to develop a comprehensive plan that will be implemented over the life of the permit to eliminate illegal connections and discharges.	Year 1
5D	Train staff to detect and appropriately eliminate illegal discharges and connections.	Trained staff will be able to be the first line of defense in eliminating and/or addressing illegal discharges and connections.	Year1
5E	Develop and implement an illegal discharge and connection tracking system.	Tracking the number, type and location of illegal discharges and illegal connections will enable the CSD to determine the effectiveness of the program.	Year 1
5F	Analyze and identify potential legal mechanisms or policies that can be enforced to eliminate illegal discharges and connections.	To provide the CSD with tools for prohibiting and enforcing the probation of illegal discharges and connections.	Year 1 and 2
5G	Modify the existing graffiti hotline to incorporate public reporting of illegal discharges and connections.	To provide the public with a mechanism to report illegal discharges and connections.	Year 2-5
5H	Educate members of Partners of the Parks to	To establish a core group of members of the public who will	Year 2-5

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Table 5-1. Illegal Discharge Program Measurable Goals.			
	Goal Description	Objective of Goal	Year Implemented
	identify and report illegal discharge and connections	receive specific information regarding illegal discharge detection and elimination.	

VI Construction Activities Program

The CSD is responsible for the construction of new or modified parks, recreational, and fire related facilities. For projects that disturb more than one acre of soil, the CSD obtains coverage under the National Pollutant Discharge Elimination System General Construction Permit for Storm Water Discharges Associated with Construction Activity (General Construction Permit) Water Quality Order 99-08-DWQ. (Including in Appendix E) by filing a Notice of Intent with the State Water Resources Control Board and develops and implements a site specific Storm Water Pollution Prevention Plan (SWPPP) which meets the requirements of the General Construction Permit.

The General Municipal Permit requires the CSD to develop a construction program which includes compliance with the requirements of the General Construction Permit. The goal of the program is to reduce pollutants in storm water runoff generated from construction activities that result in a land disturbance of greater or equal to one acre. This program must include the following:

- Develop and implement an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions or other effective mechanisms to ensure compliance to the extent allowable under State, or Local law.
- Develop and implement requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site that may cause adverse impacts to water quality.
- Develop procedures for site plan review which incorporate consideration of potential water quality impacts.
- Procedures for receipt and consideration of information submitted by the public.
- Procedures for site inspection and enforcement of control measures.

6.1 CSD Construction Program

Construction activities that typically occur on CSD properties are typically completed by the CSD or its contractors and not by third party entities. The CSD is responsible for the design and construction of new park and recreation and fire facilities. The CSD typically utilizes contractors for construction and issues bid document which the contractor must abide by for the construction of any specific facility. Through these contractual documents CSD staff consultants must prepare SWPPPs, for approval by the City, to develop and implement a site specific SWPPP. The SWPPP identifies construction activities that have the potential to cause pollution and BMPs that will be implemented to reduce the potential for polluted storm water discharges and

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non-authorized nonstorm water discharges. The BMPs that are identified for implementation comply with the Best Conventional Technology/Best Available Technology (BCT/BAT) criteria required by the General Construction Permit to address pollutant discharge generated from construction sites. The CSD utilizes the California Storm Water Best Management Practice Handbook (CASQA, January 2003) and the California Department of Transportation's Storm Water Quality Handbooks for appropriate usage and implementation of construction site BMPs. In addition, the CSD utilizes the California Department of Transportation's storm water related standard special provisions to ensure any contractor completing construction activities on behalf of the CSD, on CSD properties or facilities, complies with the requirements of the General Construction Permit.

The CSD utilize the City for plan review and approval process which includes review of all SWPPPs to ensure they meet the requirements of the General Construction Permit. The CSD ensures that all SWPPPs include the implementation of site specific storm water pollution prevention measures and requires an effective combination of sediment and erosion controls to be included into all project plans.

The individual responsible for implementing the Construction Storm Water Program is:

Paul Mewton
Landscape Architect
8820 Elk Grove Boulevard, Suite 1
Elk Grove, California 95624
paulmewton@csdparks.com

6.2 Measurable Goals for the Construction Program

Prior to obtaining Municipal NPDES Permit coverage the CSD already had an established construction storm water program which included the development of SWPPP for projects that disturb one acre or more of soil. The primary goal for the CSD's Construction Storm Water Program will be to improve existing processes, establish standard SWPPP development and review procedures, and to establish a self compliance auditing program. Table 6-1 identifies specific measurable goals that if achieved, will ensure the CSD's storm water program is in compliance with the General Municipal NPDES Permit and the General Construction Permit.

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Table 6-1. Construction Program Measurable Goals.

	Goal Description	Objective of Goal	Year Implemented
6A	Conduct and evaluation of the existing SWPPP review process.	To determine if any process modifications are required.	1
6B	Develop a standard SWPPP template for all CSD construction projects.	To ensure the SWPPPs developed and implemented for the CSD are standardized which will ensure compliance with the General Construction Permit.	1
6C	Develop a tracking mechanism to log all construction jobs that required a SWPPP.	The tracking tool will enable the CSD to develop a "big picture" outlook of the CSD's construction storm water program.	1
6D	Develop and provide construction storm water training for construction inspection staff and CSD contractors.	To ensure staff understand SWPPP and BMP requirements.	1
6E	Develop a construction compliance inspection and evaluation plan including standard inspection forms.	To determine SWPPP compliance on construction sites.	2
6F	Evaluate construction site BMPs and develop a standard list of BMPs to be considered for all construction projects.	A standard list of BMPs will aid CSD staff and contractors in ensuring SWPPPs implemented on construction sites are effective in preventing storm water pollution.	2
6G	Modify the SWPPP template based upon the new list of approved BMPS.	Will ensure the SWPPPs implemented on CSD construction sites continue to be effective in reducing construction related storm water pollution.	3
6H	Evaluate results of the SWPPP compliance program to identify training needs.	Will enable the CSD to identify common issues that can be addressed through staff and contractor training.	4-5

VII New Development Program

The CSD must develop and implement a program to incorporate BMPs that protect water quality and control runoff into new facilities and existing facilities that undergo significant redevelopment. The Small MS4 General Permit requires the CSD to develop, implement and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than one acre that discharge into the MS4 drainage facility to prevent or minimize water quality impacts. The permit also requires the CSD to develop and implement a combination of structural treatment controls and structural non-treatment BMPs on new or redevelopment projects. In addition, the CSD is required by the Permit to establish long term maintenance and operation procedures for treatment BMPs. The CSD is a unique non-traditional MS4 municipality and does not approve new or redevelopment projects that are completed by third party entities off of CSD property. Therefore, the CSD will not require the development of an ordinance or other regulatory mechanism to ensure third party project are in compliance with storm water treatment requirements. However, the CSD will incorporate treatment BMPs and pollution prevention BMPs into the design of new parks, recreation and fire facilities as required by the General Municipal Permit.

7.1 CSD New Development Program

The CSD was previously under the jurisdiction of the City of Elk Grove's SWMP and therefore has already been required to implement treatment and pollution prevention BMPs into new and redevelopment projects. The CSD will utilize the requirements and standards contained in the Stormwater Quality Design Manual for the Sacramento and South Placer Regions (May 2007) for the incorporation and design of treatment and source control measures. The CSD is unique in that the majority of the CSD facilities are parks and include a significant amount of vegetation. The CSD will be able to leverage the vegetated areas that are incorporated into all parks to develop treatment systems that will easily incorporate into project design and that will also fit into existing maintenance and operational procedures. The CSD can also take advantage of the large amount of pervious surfaces incorporated into park landscapes, to reduce the amount of storm water runoff discharged from the site. In, addition the new fire fighter training facility was design to include a dry weather flow diversion facility to allow for the diversion of the polluted non-storm water flows generated from fire training activities to the sewer system for treatment at the waste water treatment plant.

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The individual responsible for implementing the New Development Program is:

**Charles Yates
Projects Manager
Administrative Services Department**

**8820 Elk Grove Boulevard, Suite, 3
Elk Grove, California 95624
916-405-7188
charlesyates@yourcsd.com**

Table 7-1. New Development Program Measurable Goals.			
	Goal Description	Objective of Goal	Year Implemented
7A	In conjunction with the storm drain inventory goal identified in Section 5, the CSD will identify all existing treatment BMPs.	To identify all existing Treatment BMPs.	1
7B	Develop a tracking mechanism to log all treatment BMPs implemented.	The tracking tool will enable the CSD to develop a "big picture" outlook of the CSD's treatment controls that are implemented on new and redevelopment projects. This information will be reported in the Annual Report.	1
7C	Develop and provide treatment BMP related training for construction planning and design staff.	To ensure staff understand treatment BMP and pollution prevention BMP design.	1
7D	Develop a standard maintenance and operational procedures for treatment and pollution prevention BMPs.	To ensure treatment and design pollution prevention BMPs are maintained and operated in conformance with permit requirements.	2
7E	Develop a maintenance plan for constructed treatment and pollution prevention BMPs.	To ensure constructed post construction BMPs remain effective in removing pollutants from storm water discharges.	2

VIII Municipal Operations

The Permit requires the CSD to develop municipal operation procedures such as good housekeeping practices that will reduce the potential for pollutants to become in contact with storm water runoff. Specifically the Permit requires the CSD to develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and requires the CSD to use training materials that address specific municipal operation activities that have the potential to cause pollution.

8.1 CSD Municipal Operation Program

The CSD is composed of three primary departments: Administration, Parks & Recreation, and Fire. With exception of administration, there is potential to cause pollution while conducting daily activities. However, the Permit does state that activities associate with emergency fire fighting activities are exempt from complying with non-storm requirements of the permit unless those activities pose a significant threat to water quality of a specific receiving water.

The activities conducted by the Parks and Recreation department include the following:

- General Facility Maintenance
- Trash and Litter Removal
- Vegetation Maintenances
- Minor Construction
- Vehicle and Equipment Maintenance
- Irrigation Maintenance
- Herbicide and Pesticide Application
- Coordination of Public Events
- Management of the Recreation and Aquatic Centers
- Management of Roadside Vegetation
- Storm Drain Maintenance
- Graffiti Removal
- Maintenance Operations

The CSD is responsible for implementing pest control management practices with right-of-ways, facilities grounds, and other areas located throughout the district. The CSD is committed to using the most environmentally safe practices for pest control to ensure the potable water sources, other aquatic resources, and public private property.

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The CSD applies herbicide and pesticides on an as needed basis and is very careful to minimize herbicide. The CSD tracks herbicide and pesticide usage on a monthly basis and reports quantities to the County Agricultural Commissioner on a quarterly basis. Typically the CSD utilizes a contractor for herbicide application. However, the CSD currently employs seven individuals that are certified by the Department of Pesticide Regulation to be qualified applicators of herbicides. The certification requires each certified individual to pass a Laws and Regulations Examination and accumulate at least 20 hours of approved continuing education every two years prior to certificate renewal. In addition, one CSD employee is a licensed Agricultural Pest Control Advisor. To obtain the license the individual was required to pass an exam and must also accumulate at least 40 hours of approved continuing education every two years prior to license renewal. Copies of these certificates are located in Appendix F.

In addition, the CSD will incorporate Integrated Pest Management (IPM) techniques into their existing herbicide and pesticide application procedures to develop a consistent approach toward pesticide usage and management throughout the district. IPM consists of a pest management strategy that focuses on long term prevention of pests with minimum impact on human health, the environment, and non-target organisms. These IPM procedures will ensure that the CSD:

- Reduces and/or eliminates the use of pesticide products that pose known, human health or environmental risks;
- Promotes the use of non-hazardous and/or reduced risk alternatives that are protective of human health and the environment;
- Applies pesticides in a manner that protects and enhances our region's natural resources and public health;
- Pesticide use is a model of environmental stewardship in the eyes of the public;
- Establishes a program where pesticides categorized as toxic or persistent (Tier 1) are only used when there is a threat to public health, safety or the environment, or when use is warranted to prevent economic damage and only after other alternatives have been implemented and shown to be ineffective or considered and found infeasible;
- Establishes a clear criteria for pesticide use, to reduce the amount and toxicity of pesticides and eliminate pesticide use on CSD property and where feasible;
- Establishes a form of evaluating the effectiveness of pesticides for improved future actions.

As a member of the CSD, the Department provides fire, rescue and emergency medical services to an area covering over 106 square miles of southern Sacramento County encompassing the city of Elk Grove and the neighboring communities of

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Franklin and Laguna West/Lakeside. The activities conducted by the Fire Department include the following:

- Responding to Emergencies
- Training
- Public Education and Outreach
- Fire Facility Operations

The activities that have the potential to cause storm water pollution are related to vegetation management at the parks.

The individual responsible for implementing the Municipal Operations Program:

Dave Womack
Superintendent of Parks
9014 Bruceville Rd
Elk Grove, California 95624
916-405-5600
davewomack@csdparks.com

8.2 Measurable Goals

Implementing the measurable goals identified in Table 8-1 will ensure the CSD complies with the Municipal Operation requirements of the General Permit.

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Table 8-1. Municipal Operation Program Measurable Goals.			
	Goal Description	Objective of Goal	Year Implemented
8A	Identify pollutants of concern associated with typical municipal operation activities.	To aid the CSD in identifying housekeeping BMPs that can be implemented to reduce the potential for pollutant storm water and illegal nonstorm water discharges.	1
8B	Develop a suite of good housekeeping BMPs for both Parks and Rec. and the Fire Department.	This will aid staff in the implementation of good housekeeping BMPs.	1
8C	Inspect all maintenance facilities, fire stations and storage yards to identify storm water related deficiencies.	Will enable the CSD to identify deficiencies at their facilities to establish a list of repairs or changes to practices that are required to reduce storm water pollution.	1
8D	Develop and provide BMP related training for all relevant staff.	To ensure staff understand good housekeeping practices.	1
8E	Develop a pesticide and herbicide tracking tool to track amounts, types and locations application.	To aid the CSD in determining if pesticide and herbicide usage can be reduced or if application practices should be modified.	2
8F	Develop a facility pollution prevention plans for all CSD facilities excluding parks.	To ensure storm water pollution prevention is addressed and implemented at all CSD facilities.	2
8G	Develop a facility compliance inspection program and implement the program.	To aid the CSD in determining level of compliance at all facilities.	3-5

IX Program Assessment, Reporting and Measurable Goals

Significant staff and financial resources will be expended by the CSD to implement the Storm Water Management Program and the requirements of the SWMP and Permit. To ensure the program is effective and to ensure resources are expended efficiently, the NPDES Compliance Team will complete an annual review of the program and identified measurable goals prior to developing and submitting the Annual Report. The Annual Report will be submitted to the Central Valley RWQCB and will also be available for the public to review. The measurable goals identified throughout the SWMP will be utilized to assess the effectiveness of the program and overall achievement of compliance with the Municipal Permit.

The Municipal Permit does not apply effluent limitations to storm water discharges generated from CSD facilities. Instead it requires the CSD to develop a program which relies upon the implementation of BMPs that are required to meet the MEP criteria. Thus, the measuring the effectiveness of the program and compliance of the permit will be evaluated on the implementation of measurable goals. However, the CSD is prohibited from violating water quality standards of impacting beneficial uses of a receiving water. MEP is a standard that evolves as new technology and efficiency evolve and become available. As this occurs the SWMP and specifically the measurable goals will be re-evaluated as necessary to maintain compliance with the Permit.

The measurable goals identified for the CSD's storm water program, once achieved, are intended to collectively meet the requirements of the eight minimum control measures identified by the Municipal Permit and are also intended to reduce or eliminate pollutant storm water discharges and illegal nonstorm water discharges. Each measurable goal will be achieved in the time period specified. Some measurable goals are a one time activity, while others will be implemented continuously over a longer period of time or on an ongoing basis. Figure 9-1 provides a summary of the measurable goals that were identified for each storm water program component. As stated above, these measurable goals may be modified as necessary to improve the CSD's program or to achieve compliance with the General Phase II Permit.

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Table 9-1. Summary of Measurable Goals.			
Year Implemented		Goal Description	Objective of Goal
Year 1	3A	Develop a training plan for park and recreation staff. The plan should include identifying key staff that requires training, developing a training schedule, and developing curriculum.	The objective of this goal is to develop a plan that will facilitate providing CSD staff with the knowledge they require to ensure their areas of responsibility and activities that they conduct are in compliance with the requirements of the General Permit and that they implement appropriate water pollution prevention measures at all times.
Year 1	3B	Develop a Storm Water Pollution Prevention Slogan.	Have a slogan that is concise and clearly explains to the public that can be incorporated into various media mechanisms that all ready exist.
Year 1	3C	Develop storm water pollution prevention materials, such as brochures, handouts, materials, etc...	To have educational material and pollution prevention reminders to handout to members of the public
Year 1	4A	Post a notification on the CSDs website regarding the CSD's new SWMP.	To inform the public of the development and approval process of the SWMP.
Year 1	4B	Post a notice on the CSD's website that the Annual Report is available for review.	To inform the public of the progress made in the implementation of the CSD's SWMP during the first year.
Year 1	4C	Post general information regarding the Storm Water Management Program on the CSD's website.	To provide the public with pertinent information such as contact information, opportunities for public participation, and information regarding storm water pollution prevention.
Year 1	5A	Conduct an inspection of each CSD facility to identify facilities or parks that are at high risk for illegal dumping or discharges.	Through the identification facilities and parks that have a high illegal discharge and dumping risk the CSD will be able to use this information to develop a comprehensive plan for eliminating them.
Year 1	5B	Complete a storm drain	The storm drain inventory will

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Table 9-1. Summary of Measurable Goals.			
Year Implemented		Goal Description	Objective of Goal
		inventory at each CSD facility per the Permit requirements.	provide the CSD with information that will be instrumental in identifying illegal discharges and connections.
Year 1	5C	Develop an illegal discharge and connection elimination plan.	Utilizing the information accumulated during the implementation of Goals 5A and B, the CSD will be able to develop a comprehensive plan that will be implemented over the life of the permit to eliminate illegal connections and discharges.
Year1	5D	Train staff to detect and appropriately eliminate illegal discharges and connections.	Trained staff will be able to be the first line of defense in eliminating and/or addressing illegal discharges and connections.
Year 1	5E	Develop and Implement an illegal discharge and connection tracking system.	Tracking the number, type and location of illegal discharges and illegal connections will enable the CSD to determine the effectiveness of the program.
Year 1	6A	Conduct and evaluation of the existing SWPPP review process.	To determine if any process modifications are required.
Year 1	6B	Develop a standard SWPPP template for all CSD construction projects.	To ensure the SWPPPs developed and implemented for the CSD are standardized which will ensure compliance with the General Construction Permit.
Year 1	6C	Develop a tracking mechanism to log all construction jobs that required a SWPPP.	The tracking tool will enable the CSD to develop a "big picture" outlook of the CSD's construction storm water program.
Year 1	6D	Develop and provide construction storm water training for construction inspection staff and CSD contractors.	To ensure staff understand SWPPP and BMP requirements.
Year 1	7A	In conjunction with the storm drain inventory goal identified in Section 5, the CSD will identify all existing treatment BMPS.	To identify all existing treatment BMPs.

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Table 9-1. Summary of Measurable Goals.			
Year Implemented		Goal Description	Objective of Goal
Year 1	7B	Develop a tracking mechanism to log all treatment BMPs implemented.	The tracking tool will enable the CSD to develop a "big picture" outlook of the CSD's treatment controls that are implemented on new and redevelopment projects. This information will be reported in the Annual Report.
Year 1	7C	Develop and provide treatment BMP related training for construction planning and design staff.	To ensure staff understand treatment BMP and pollution prevention BMP design.
Year 1	8A	Identify pollutants of concern associated with typical municipal operation activities.	To aid the CSD in identifying housekeeping BMPs that can be implemented to reduce the potential for pollutant storm water and illegal nonstorm water discharges.
Year 1	8B	Develop a suite of good housekeeping BMPs for both Parks and Rec. and the Fire Department.	This will aid staff in the implementation of good housekeeping BMPs.
Year 1	8C	Inspect all maintenance facilities, fire stations and storage yards to identify storm water related deficiencies.	Will enable the CSD to identify deficiencies at their facilities to establish a list of repairs or changes to practices that are required to reduce storm water pollution.
Year 1	8D	Develop and provide BMP related training for all relevant staff.	To ensure staff understand good housekeeping practices.
Year 1 and 2	3D	Develop a storm water knowledge survey to informally give to members of the public.	To determine the public's level of storm water pollution prevention knowledge. The results from the survey can be utilized to determine future public education topics and targeted audiences.
Year 1 and 2	5F	Analyze and identify potential legal mechanisms or policies that can be enforced to eliminate illegal discharges and connections.	To provide the CSD with tools for prohibiting and enforcing the probation of illegal discharges and connections.
Year 2	3E	Train 50% of all staff and	To ensure 100% of staff

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Table 9-1. Summary of Measurable Goals.			
Year Implemented		Goal Description	Objective of Goal
		any new staff identified in the internal training program that will be developed during year 1 of the permit.	responsible for implementing and/or complying the SWMP and Permit are trained appropriate
Year 2	3F	Develop a storm water pollution prevention booth.	To have the booth that can be mobilized to a multitude of CSD events that can serve as a forum for educating the public
Year 2	3G	Dedicate one of the Farmer's Market Nights to Storm Water Pollution Prevention	Highlight the importance of storm water pollution prevention by singling it out as a special night of consideration at the Farmers' Market.
Year 2	3H	Train the remaining 50% of staff that did not receive storm water quality training the previous year.	To ensure all relevant staff receive appropriate storm water training to ensure daily activities are in compliance with the Permit, the SWMP and implement storm water pollution prevention activities during daily activities.
Year 2	4D	Post a notice on the CSD's website that the Annual Report is available for review.	To inform the public of the progress made in the implementation of the CSD's SWMP during the second year.
Year 2	4E	Post general information regarding the Storm Water Management Program on the CSD's website.	To provide the public with pertinent information such as contact information, opportunities for public participation, and information regarding storm water pollution prevention.
Year 2	6E	Develop a construction compliance inspection and evaluation plan including standard inspection forms.	To determine SWPPP compliance on construction sites.
Year 2	6F	Evaluate construction site BMPs and develop a standard list of BMPs to be considered for all construction projects.	A standard list of BMPs will aid CSD staff and contractors in ensuring SWPPPs implemented on construction sites are effective in preventing storm water pollution.
Year 2	7E	Develop a standard	To ensure treatment and design

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Table 9-1. Summary of Measurable Goals.			
Year Implemented		Goal Description	Objective of Goal
		maintenance and operational procedure for treatment and pollution prevention BMPs.	pollution prevention BMPs are maintained and operated in conformance with permit requirements.
Year 2	7F	Develop a maintenance plan for constructed treatment and pollution prevention BMPs.	To ensure constructed post construction BMPs remain effective in removing pollutants from storm water discharges.
Year 2	8E	Develop a pesticide and herbicide tracking tool to track amounts, types and locations application.	To aid the CSD in determining if pesticide and herbicide usage can be reduced or if application practices should be modified.
Year 2	8F	Develop facility pollution prevention plans for all CSD facilities excluding parks.	To ensure storm water pollution prevention is addressed and implemented at all CSD facilities.
Year 2-5	5G	Modify the existing graffiti hotline to incorporate public reporting of illegal discharges and connections.	To provide the public with a mechanism to report illegal discharges and connections.
Year 2-5	5H	Educate members of Partners of the Parks to identify and report illegal discharge and connections	To establish a core group of members of the public who will receive specific information regarding illegal discharge detection and elimination.
Year 3	3I	Develop storm water pollution prevention curriculum to include into the CSD's after school and child education programs.	The objective of this goal is to develop a standard set up storm water pollution prevention curriculum that can be integrated into the various CSD sponsored children programs.
Year 3	4F	Post a notice on the CSD's website that the Annual Report is available for review.	To inform the public of the progress made in the implementation of the CSD's SWMP during the third year.
Year 3	4G	Post general information regarding the Storm Water Management Program on the CSD's website.	To provide the public with pertinent information such as contact information, opportunities for public participation, and information regarding storm water pollution prevention.
Year 3	6G	Modify the SWPPP	Will ensure the SWPPPs

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Table 9-1. Summary of Measurable Goals.			
Year Implemented		Goal Description	Objective of Goal
		template based upon the new list of approved BMPS.	implemented on CSD construction sites continue to be effective in reducing construction related storm water pollution.
Year 3-5	3J	Integrate storm water pollution prevention curriculum into existing children programs.	The objective of this goal is to educate the youngest members of the public regarding storm water pollution prevention to begin a cultural change in the way society views storm water quality.
Year 3-5	8G	Develop a facility compliance inspection program and implement the program.	To aid the CSD in determining levels of compliance at all facilities.
Year 4	4H	Post a notice on the CSD's website that the Annual Report is available for review.	To inform the public of the progress made in the implementation of the CSD's SWMP during the fourth year.
Year 4	4I	Post general information regarding the Storm Water Management Program on the CSD's website.	To provide the public with pertinent information such as contact information, opportunities for public participation, and information regarding storm water pollution prevention.
Year 4-5	6H	Evaluate results of the SWPPP compliance program to identify training needs.	Will enable the CSD to identify common issues that can be addressed through staff and contractor training.
Year 5	3K	Develop and implement another storm water knowledge public survey.	TO determine if the public's knowledge has increased at all over the life span of the Public Education and Outreach Program to determine whether or not it was effective in increasing the public's storm water pollution prevention knowledge.
Year 5	4J	Post a notice on the CSD's website that the Annual Report is available for review.	To inform the public of the progress made in the implementation of the CSD's SWMP during the first year.
Year 5	4K	Post general information regarding the Storm Water Management Program on	To provide the public with pertinent information such as contact information, opportunities

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Table 9-1. Summary of Measurable Goals.			
Year Implemented		Goal Description	Objective of Goal
		the CSD's website.	for public participation, and information regarding storm water pollution prevention.

9.1 Annual Reporting

Per the requirements of the Permit, an Annual Report will be prepared each year for submittal to the Central Valley RWQCB. The Reporting period is from July 1st to June 30th of each year and will be submitted to the Regional Board by September 15th of each year. In addition, the Annual Report will be posted on the CSD's website to allow the public an opportunity to review. The Permit requires the Annual Report to include or address the following:

- The Status of compliance with permit conditions.
- An assessment of the appropriateness and effectiveness of the identified BMPs.
- The status of the identified measurable goals.
- A summary of the storm water activities that the permittee plans to undertake during the next reporting cycle.
- Any proposed changes to SWMP along with a justification of why the changes are necessary.
- Any changes to the person or persons implementing and coordinating the SWMP.

In addition, prior to submitting the Annual Report, the CSD's NPDES Compliance Team will conduct an evaluation of the storm water program and the progress towards achieving the identified measurable goals to determine if any modifications to the program goals are required to achieve compliance or to conduct program activities more efficiently and effectively.

9.2 Non-Compliance Reporting

Per the requirements of the Permit, the CSD will report any instances of non-compliance or exceedance of water quality standards to the RWQCB within 30 days. Cosumnes CSD will also contact the City of Elk Grove in an instance of non-

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compliance because the Cosumnes CSD facilities drain to the city's Phase I MS4 system.

9.3 Recordkeeping Requirements

The Permit requires the CSD to keep records required by the General Permit for at least five years for the duration of the General Permit if continued. The RWQCB Executive Officer may specify a longer duration for record retention. The CSD will have all records available for submittal to the RWQCB if requested. In addition, all SWMP related records will also be available for the public during business hours.



Appendix A
Small MS4 General Permit



Appendix B
NOI



Appendix C
WDID Number and State Board Receipt Letter



Appendix D
Full Size Map of CSD Facilities



Appendix E
General Construction Permit



Appendix F
Herbicide/Pesticide Applicator Certificates