

# Clark County Clean Water Commission

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**August 7, 2024**

Hybrid Meeting





Meeting Agenda

Wednesday, August 7, 2024 - 6:00 pm  
Public Service Center (PSC) Conference Room #698  
1300 Franklin Street, Vancouver, WA 98666

CWC Members:

Ted Gathe, Chair  
Burnt Bridge Creek Watershed

Glen DeWillie, Vice Chair  
Lacamas Watershed

Tracy Ceravolo  
Gee Creek Watershed

Alejandra Cortes  
Salmon Creek Watershed

Glen DeWillie  
Lacamas Watershed

Ted Gathe  
Burnt Bridge Creek Watershed

Vacant  
TBD Watershed

Sandra Martin-Boehm  
West Slope Watershed

Kate Perkins  
North Fork Lewis River Watershed

Rudy Salakory  
Vancouver Lake / Lake River Watershed

Phil Struck  
Salmon Creek Watershed

Clark County Staff Liaison:  
Alice Millward  
Program Assistant  
Phone: 564.397.5267  
Email: [alice.millward@clark.wa.gov](mailto:alice.millward@clark.wa.gov)

2024 Regular Meetings:  
Feb. 7, 2024  
April 3, 2024  
June 5, 2024  
Aug. 7, 2024  
Oct. 2, 2024  
Dec. 4, 2024

2024 Special Meetings:  
July 30 Field Trip  
October 17 Vancouver Lake Symposium

\*\* Motion Needed

1. CALL TO ORDER - Acting Chair DeWillie
2. ADMINISTRATIVE ACTIONS
  - a. Roll Call and Introductions
  - b. Approve April 3, 2024 and June 5, 2024, Meeting Summaries \*\*
3. PUBLIC COMMENTS SUBMITTED:  
The public is encouraged to participate in this meeting in the following ways:
  - Attend in person at the PSC Conference Room #698
  - Submit comments to [cleanwater@clark.wa.gov](mailto:cleanwater@clark.wa.gov) by 12pm on 8/07/2024
  - By phone: (213) 262-7043 meeting number 593 348 278#
  - By computer: [Join the meeting](#)
4. UNFINISHED BUSINESS / ACTIONS
  - a. July Bus Tour Recap
  - b. Staff Liaison Report – Alice Millward
    - 1) 2023 Annual Report Work Session – Aug 21
    - 2) 2024 and 2025-27 New Commissioner Recruitment Update
    - 3) Pollution Prevention Assistance (PPA) Environmental Justice (EJ) Plan
    - 4) Miscellaneous Updates
  - d. 2024 CWC Work Plan
    - 1) Rate Study Support – Work Group
    - 2) Vancouver Lake Symposium – Work Group (Gathe Lead)
    - 3) Code Revision Work Group
    - 4) Environmental Justice and Watershed Health
5. NEW BUSINESS / ACTIONS
  - a. New Stormwater Permit – Rod Swanson
  - b. FY 2025 Grant Awards (Heritage Farm / Follow the Water / PoopSmart Clark)
6. CLEAN WATER DIVISION UPDATES
  - a. Manager's Update – Devan Rostorfer
    1. Updates on 2024 Rate Study (Council Work Approval – Aug 27)
    2. Lakes Updates
    3. RFP Updates
7. ROUNDTABLE DISCUSSION / COMMISSIONER'S COMMENTS
8. ADJOURN – Acting Chair DeWillie

Note: An audio/video recording of this meeting will be available through the county website at: <https://www.clark.wa.gov/public-works/clean-water-commission>



# Approval of Minutes

- April 3, 2024
- June 5, 2024



**August 7, 2024**

**Public Comment**



# Unfinished Business / Actions



# July 2024 Clean Water Bus Tour

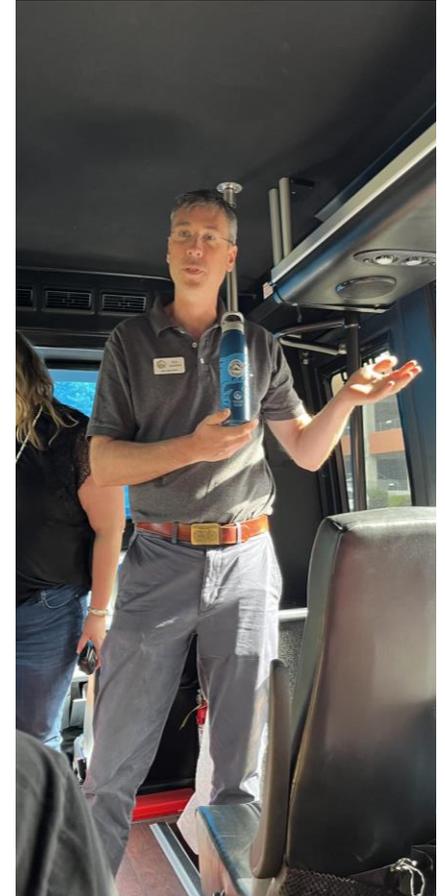


**Date:** Tuesday, July 30, 2024



# July 2024 Bus Tour

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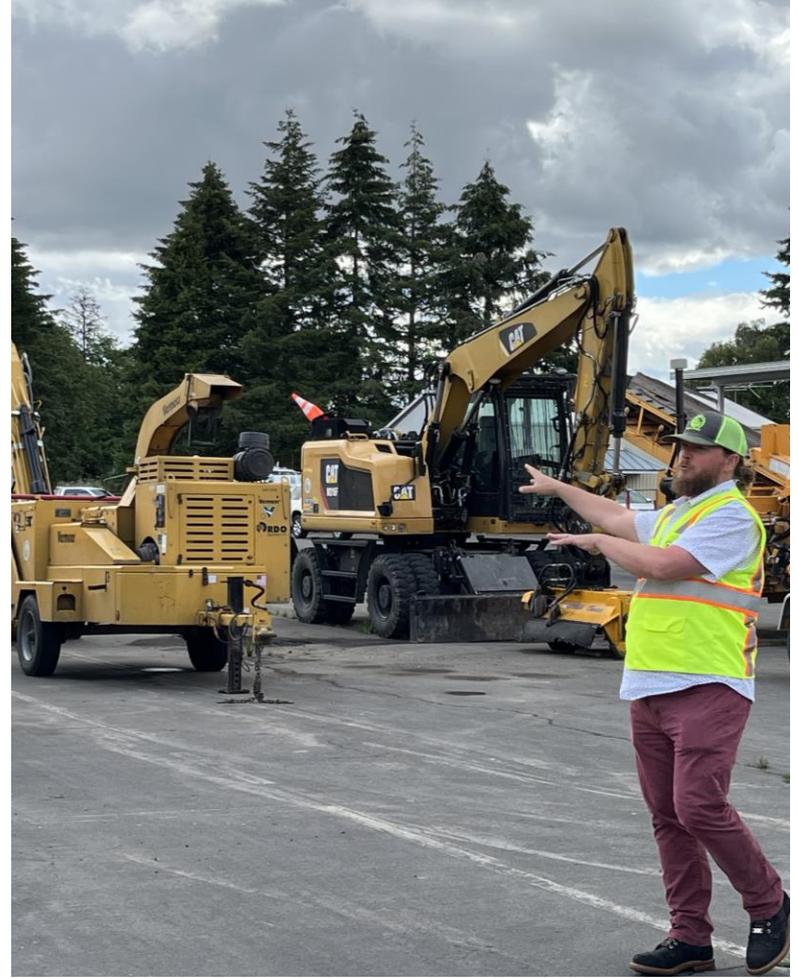


# July 2024 Bus Tour

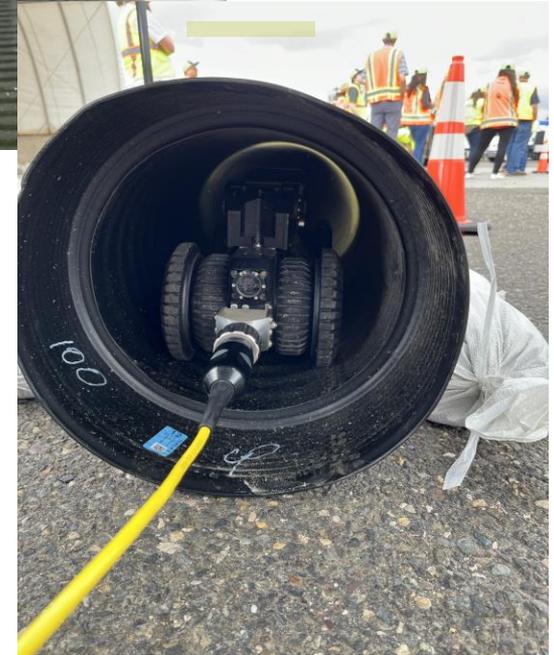
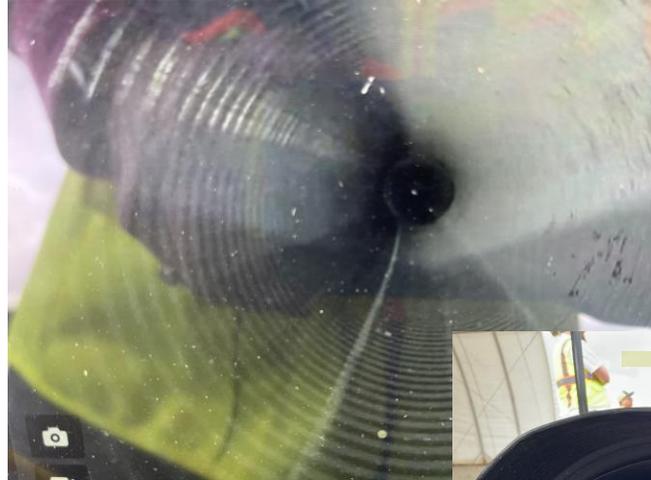
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# July 2024 Bus Tour



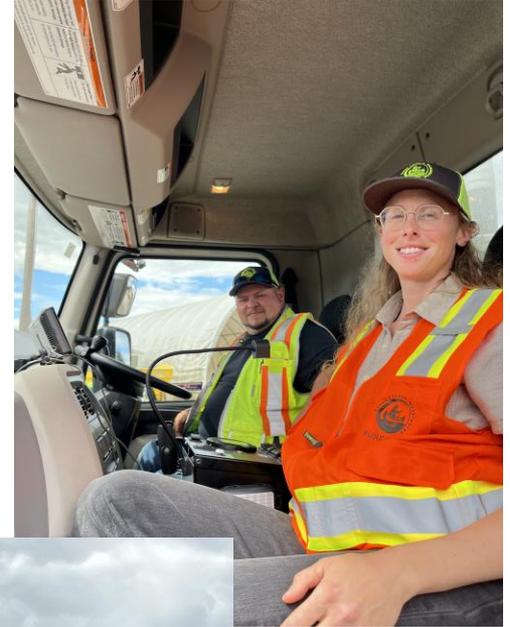
# July 2024 Bus Tour



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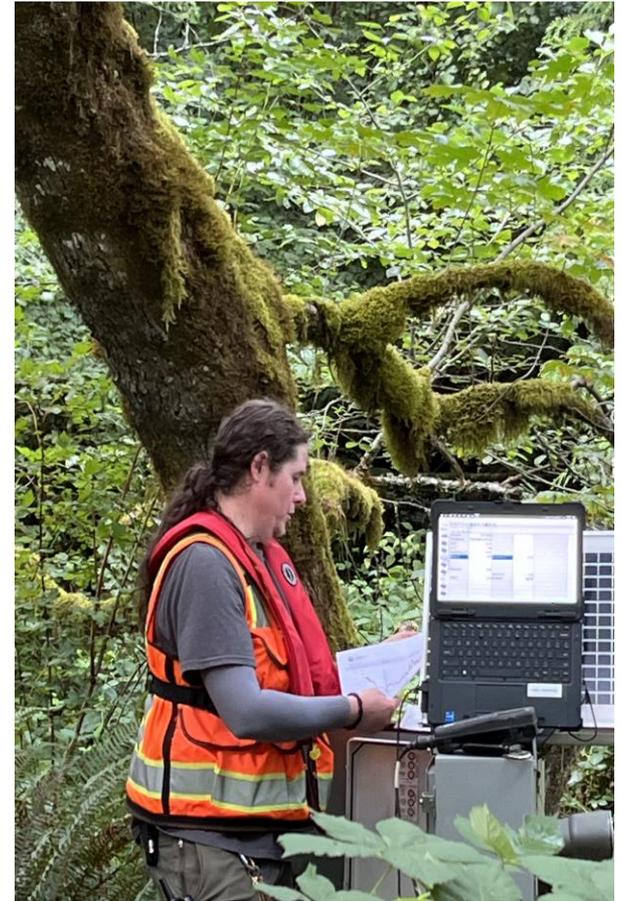
# July 2024 Bus Tour

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# July 2024 Bus Tour

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# July 2024 Bus Tour

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# July 2024 Bus Tour

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# July 2024 Bus Tour

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# Staff Liaison Report

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# Staff Liaison's Report Overview

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- August 21<sup>st</sup> Work Session:  
2023 Annual Report & 2024 Work Plan
- New Commissioner Recruitment
- Pollution Prevention Assistance (PPA)  
Environmental Justice (EJ) Plan
- Miscellaneous Updates



# 2024 CWC Work Plan



# Vancouver Lake Symposium Work Group



# Save the Date

## Vancouver Lake Symposium

9 a.m. - 4 p.m.  
Thursday, Oct. 17

*Vancouver Water Resources Education Center*



CLARK COUNTY  
WASHINGTON

PUBLIC WORKS  
CLEAN WATER

# Rate Study Work Group



# What we heard from Council



**Gary Medvigy**  
Chair / Councilor District 4  
Contact



**Glen Yung**  
Councilor District 1  
Contact



**Michelle Belkot**  
Councilor District 2  
Contact



**Karen Dill Bowerman**  
Councilor District 3  
Contact



**Sue Marshall**  
Councilor District 5  
Contact



Need to prioritize

Do more with less

Focus on mandated services

Different service delivery models

Phase Implementation

Look at different revenue sources



# Funding Gap Change – May to July 2024

~\$50.2M  
Gap



~\$36.4M  
Gap



~\$17.9M  
Gap

✓ Combined service responsibilities into fewer FTEs.

✓ Fine tuned maintenance & operations costs.

✓ Phased implementation over 5-years

✓ Reduced certain investments.

✓ Identified other revenue sources to “buy-down” rates.

- REET 2 = \$7.5 Million
- Fund Balance = \$6.5 Million
- Grants = \$2 Million
- Reimbursables & Interest = \$2.5 Million
- Total = \$18.5M revenue 2025-2029

# DRAFT – Annual Stormwater Rates 2025 to 2029

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*Flat rate 2025 to 2029*

*Note: Current Rate = \$47 per year*

Clean Water Services	2025-2029
Mandated only	\$64.86
Mandated + Recommended	\$80.84
Mandated + Recommended + Additional	\$86.48

Clean Water Services	2025-2029
Mandated only	+\$17.86
Mandated + Recommended	+\$33.84
Mandated + Recommended + Additional	+\$39.48



# How would inflation impact current rate?

**\$47**  
Current  
Annual Rate

**2015-2024**

**\$63.18**  
Consumer  
Price Index

**2024**

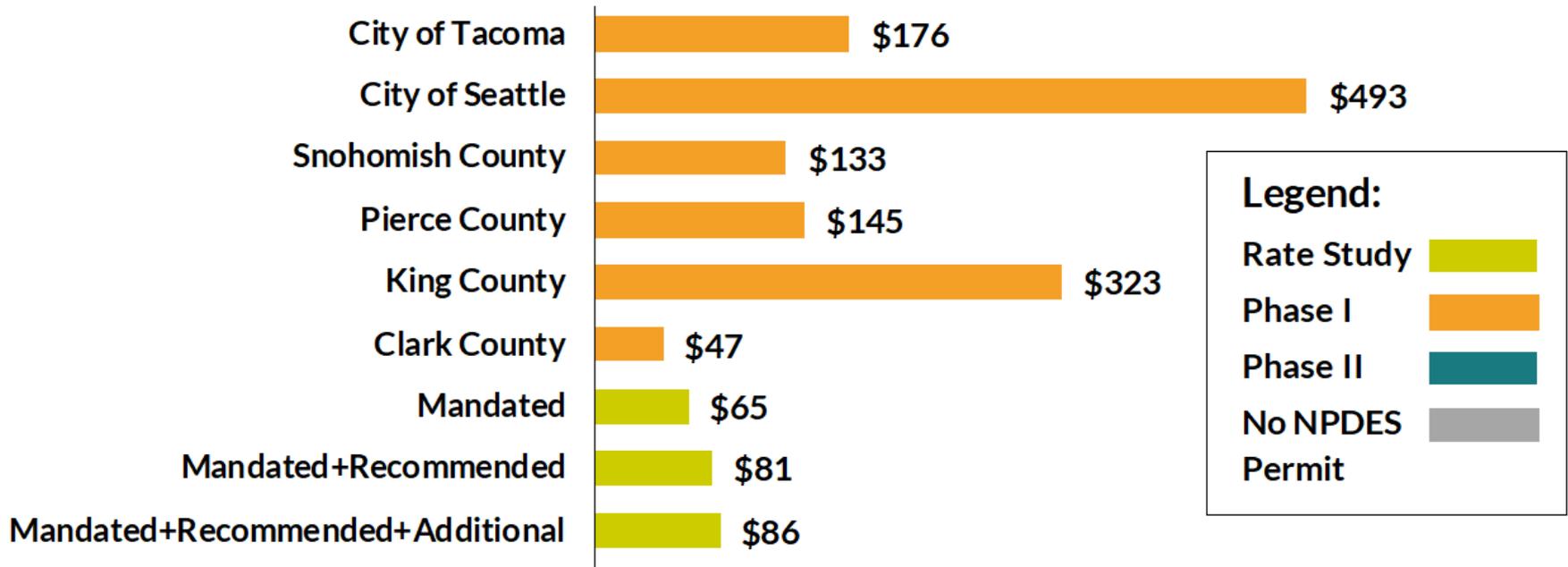
**\$63.93**  
Construction  
Cost Index

**2024**

# How do we compare – Phase I Permittees

Note: Updated on 7/30/2024

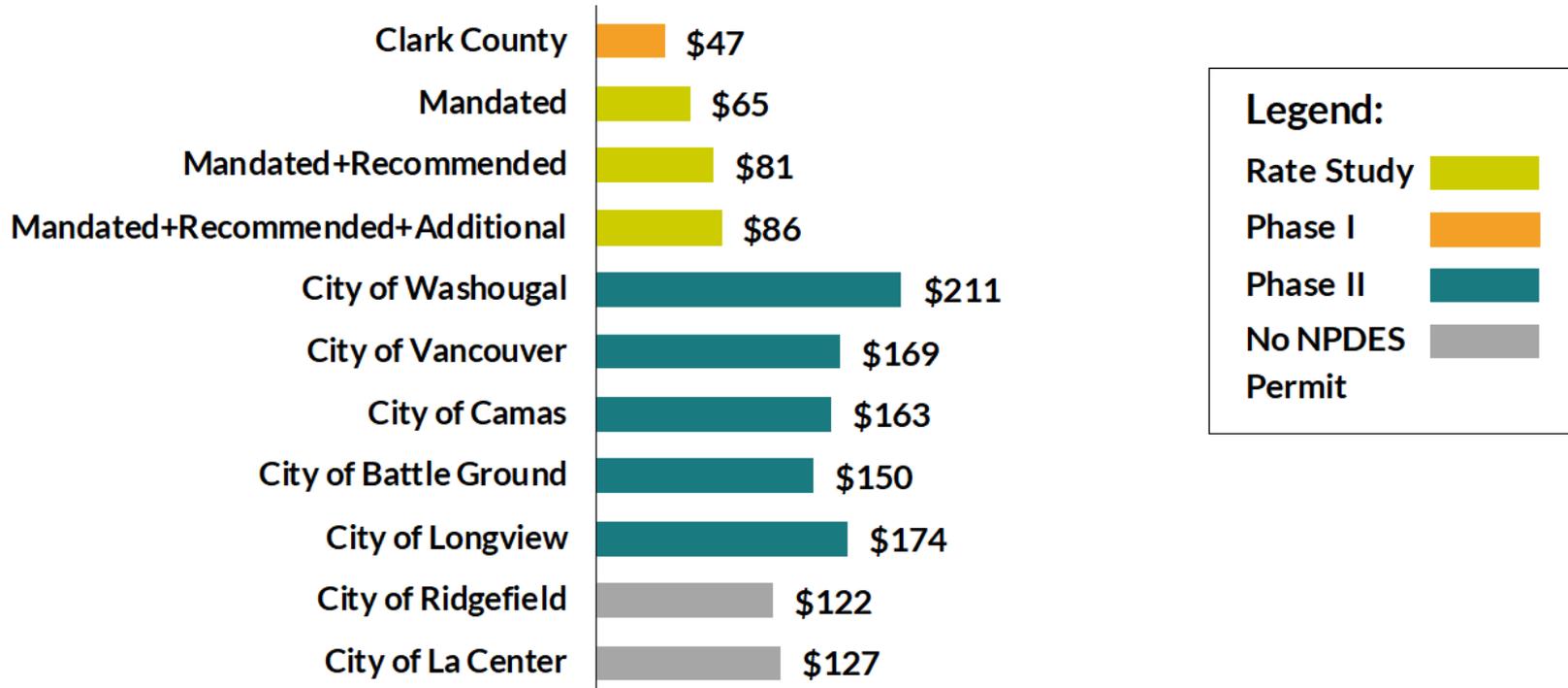
## 2023 Annual Stormwater Fee Rates



# How do we compare – Neighboring Jurisdictions

Note: Updated on 7/30/2024

## 2023 Annual Stormwater Fee Rates



# Rate Study – Next Steps

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- **September 11, 16, 19** – Public Listening Sessions.
- **September 25** – Final Work Session with Council
- **October 1** – Rate Adoption Hearing
- **October 2024** – New fees calculated.
- **December 2024** – 2025 Budget Adopt.
- **February 2025** – New fees implemented.

# Descriptions of Service Gaps

## Mandated Services



# Mandated Services(30)- what does the rate increase pay for?

No.	New or Increased Service	Description	Starting Year	Total Cost for Service through 2029
1	Quarterly Sweeping	Implement mandatory quarterly sweeping through Clean Water; cost is offset by reduction in Road Fund expense	2027	\$2,700,000
2	Routine bioretention facility maintenance	Contracted services to support annual maintenance and repair of 600+ county-owned bioretention facilities	2025	\$2,331,800
3	Routine pond/swale maintenance	Resources to support annual maintenance and repair of stormwater swales, ponds and other treatment/flow control	2025	\$2,019,300
4	Restore stormwater ponds to design capacity	Contracted services and internal resources to remove sediment from 10 out of 500 county-owned stormwater ponds by 2029	2026	\$1,000,000
5	Public Stormwater Facility Inspections	Dedicated staff resources to annually inspect 1900+ public stormwater facilities in Clark County - total number increases by 8-10% annually; provide inspections and technical assistance during site development and build-out; perform end-of-warranty inspections to verify infrastructure is working before dedication to Clark County; perform construction stormwater inspections.	2026	\$947,998
6	Monitoring Program Supervisor	Dedicated staff resource to supervise, lead, and oversee staff, contracts, projects, and interlocal agreements for monitoring program	2025	\$721,908
7	Major repair/replace of aging treatment and flow control	Asset management funding for contracted services to begin replacing treatment and flow control assets in 2029 at a rate of 2% of existing inventory annually	2029	\$660,000
8	Private Stormwater Facility Inspections	Dedicated staff resource to annually inspect and provide technical assistance for the 1800+ private stormwater facilities in Clark County - total number of facilities increases by 8-10% annually.	2025	\$584,691



# Mandated Services (30)– what does the rate increase pay for?

No.	New or Increased Service	Description	Starting Year	Total Cost for Service through 2029
9	Source Control & Pollution Prevention	Dedicated staff resource to perform Source Control inspections, pollution prevention assistance, develop new required PFAS survey/ inventory/education, and develop new PCB education and implementation	2025	\$584,691
10	Mapping & Inventory	Dedicated staff resource to inventory and map new stormwater facilities, outfall/catchment treatment areas, county ditches	2025	\$542,898
11	Velvet Acres - Failing Infrastructure Repair	Design and contracted services to repair faulty, malfunctioning infrastructure inherited by county	2026	\$500,000 (one-time)
12	Routine stormwater infrastructure maintenance and repair – Vehicles (3)	Vehicles to support annual maintenance and repair of stormwater swales, ponds and other treatment/flow control	2025	\$495,000 (one-time + ER&R)
13	Education and Outreach support	Dedicated staff resource to: attend public events to provide education and outreach; host volunteer stewardship activities; speak at schools and community events; attend neighborhood association or HOA meetings; support digital marketing; develop outreach materials; respond to community requests for information	2025	\$436,953
14	Pervious Sidewalk maintenance	Resources to perform routine maintenance of pervious sidewalks.	2027	\$426,000
15	Identified capital repair needs for failed infrastructure	Design and contracted services to repair faulty, malfunctioning infrastructure inherited by county not historically addressed.	2028	\$400,000 (one-time)
16	Capital Infrastructure maintenance >\$25K existing	Design and internal services to repair infrastructure that requires capital construction >\$25K but is not currently programmed in 6-year Stormwater Capital Plan.	2026	\$400,000 (one-time)



# Mandated Services (30)- what does the rate increase pay for?

No.	New or Increased Service	Description	Starting Year	Total cost for Service through 2029
17	Frasier Pond Cleanout	Contracted services to remove sediment from a stormwater pond transferred to county	2026	<b>\$400,000</b> (one-time)
18	Philbrook Farms - Failing Infrastructure Repair	Design and contracted services to repair faulty, malfunctioning infrastructure inherited by county.	2025	<b>\$400,000</b> (one-time)
19	Water Quality Monitoring	Conversion of one existing project scientist position to a permanent position in mid-2026	2026	<b>\$388,100</b>
20	Stormwater Management Action Planning	Contracted services to complete stormwater management action planning (SMAP)	2025	<b>\$300,000</b>
21	Stormwater training	Training for Clark County staff (outside of Clean Water Division) on stormwater development engineering requirements, inspection, constructions, operations and maintenance requirements.	2025	<b>\$250,000</b>
22	Pervious Sidewalk maintenance - Sweeper	Capital cost for a sidewalk vacuum-sweeper unit	2027	<b>\$250,000</b> (one-time + ER&R)
23	Staff Professional Development & Training	Implementation of Public Works' staff training policy to enable professional development for Clean Water Division staff.	2025	<b>\$207,600</b>
24	Tree canopy mapping, goals, and policies	Contracted services to map tree canopy in Clark County and establish tree canopy goals and policies.	2026	<b>\$200,000</b> (one-time)



# Mandated Services (30)- what does the rate increase pay for?

No.	New or Increased Service	Description	Starting Year	Total cost for Service through 2029
25	Required Public Facility Inspections – Vehicle (2)	Vehicles to support public stormwater facility inspections	2026	<b>\$164,000</b> (one-time + ER&R)
26	Stormwater Code and Manual Update	Contracted services to update Clark County's Stormwater Code and Manual by 2026	2025	<b>\$150,000</b> (one-time)
27	Stormwater pond sediment survey	Contracted services to measure sediment levels in 500 county-owned stormwater ponds to prioritize cleanout	2025	<b>\$150,000</b> (one-time)
28	Sweeping standards and Enhanced Maintenance Plan	Contracted services to develop and publish sweeping standards and Enhanced Maintenance Plan	2026	<b>\$100,000</b> (one-time)
29	Private Stormwater Facility Inspections - Vehicle (1)	Vehicle to support private stormwater facility inspections	2025	<b>\$90,000</b> (one-time + ER&R)
30	Source Control & Pollution Prevention - Vehicle (1)	Vehicle to support Source Control & Pollution Prevention	2025	<b>\$90,000</b> (one-time + ER&R)



# Descriptions of Service Gaps

## Recommended Services



## Recommended Services - what does the rate increase pay for?

No.	New or Increased Service	Description	Starting Year	Total Cost for Service through 2029
1	Major repair or replacement of aging pipe infrastructure	Asset management funding for contracted services to proactively repair/replace pipe assets, beginning in 2028 at a rate of 1% of existing inventory annually	2028	\$3,900,000
2,4,7	Pipe Asset Management - Inspections	Dedicated staff resources to perform inspection of 500 miles of underground pipe – this line item combines all staff resources (3) needed to operate the inspection program	2025	\$2,316,200
3	Capital, Asset Management & Monitoring Management	Dedicated staff resource to supervise capital, maintenance, asset management, and monitoring leads and/or programs	2025	\$838,410
5	Maintenance of 96 clean water parcels that do not serve a stormwater function	Internal services to maintain 96 parcels owned by Clean Water; primarily firebreak mowing, fence and tree mgmt., and homeless camp cleanup	2025	\$750,000
6	Capital Program Planning	Dedicated staff resource to: develop 20-year Capital Plan to ensure future access to REET II funding; support 6-year Capital Plan development and implementation; supervise capital program staff	2025	\$721,908
8	Education & Outreach Program Management	Dedicated staff resource to manage Education & Outreach program.	2025	\$670,575
9	Drywell inspections and maintenance	Resources to: routinely inspect 1,600 county-owned drywells; assist catch basin cleaning; assist drywell cleaning; assist pipe cleaning	2025	\$654,000



## Recommended Services - what does the rate increase pay for?

No.	New or Increased Service	Description	Starting Year	Total Cost for Service through 2029
10	Special Projects Coordination - Grants	Dedicated staff resource to: increase capacity to pursue external grant funding up to 3x; manage grant contracts; special projects lead. This is a revenue-generating position.	2025	\$622,996
11	Stormwater Permit Planning, Management & Reporting	Dedicated staff resource to oversee compliance program and submit required reporting	2025	\$622,996
12	Lake Management Coordination	Dedicated staff resource to provide county lake management representation and leadership for Vancouver and Lacamas Lakes.	2025	\$622,996
13	Lake Treatment (In-lake)	Support contracted in-lake treatment activities in Vancouver and Lacamas Lakes to implement Lacamas Interlocal Agreement & Vancouver Lake Management Plan.	2025	\$500,000
14	Phosphorous removal cartridges in stormwater facilities	Upgrade county cartridge treatment systems by replacing spent ZPG cartridges with phosphorus-removal cartridges	2025	\$348,000
15	Pipe Asset Management - Inspections – Vehicle (2)	Vehicles (2) to support pipe asset management inspections; one outfitted van, one p/u truck	2025	\$335,000 (one-time + ER&R)
16	Pipe Asset Management - Inspections - Software	Specialized software and video subscription to support pipe asset management inspections	2025	\$250,000



## Recommended Services - what does the rate increase pay for?

No.	New or Increased Service	Description	Starting Year	Total Cost for Service through 2029
17	NPDES Enforcement Support - Complaint Response	Dedicated staff resource to: respond to ERTS complaints; address erosion and sediment issues; perform IDDE and outfall screening; validate Clean Water fee disputes	2028	\$240,500
18	Stormwater Maintenance Bond Study	Contracted services to assess current stormwater bond rates for infrastructure, identify appropriate bond rates to ensure infrastructure is working properly before acceptance by county	2026	\$150,000 (one-time)
19	Pervious roadway maintenance	Internal services to double current level of sweeping to extend operational life of pervious roadways	2025	\$106,000
20	Asset photo inventory	Contracted services to photo-document existing public stormwater facility assets for Cartegraph asset management database	2026	\$100,000 (one-time)
21	Water Quality Monitoring - Vehicle (1)	Vehicle to support implementation of Stream Health Report Monitoring, Hydrology Monitoring, and Lower Columbia Urban Streams Monitoring	2025	\$90,000 (one-time + ER&R)



# Descriptions of Service Gaps Additional Services



## Additional Services (10)– what does the rate increase pay for?

No.	New or Increased Service	Description	Starting Year	Total Cost for Service through 2029
1	Expanded Watershed Capital Retrofits	Design and contracted services to construct one (1) additional stormwater retrofit project in high priority watersheds annually (beyond required permit program)	2028	\$1,100,000
2	Noxious weed management on Clean Water Parcels	Dedicated staff resource to increase noxious weed control capacity on all clean water parcels; support increased riparian planting project implementation	2027	\$655,300
3	Advanced Mitigation Site	Develop new advanced mitigation site to replace existing closed out site; provides capacity to meet Public Works Mitigation needs with less cost in the future	2027	\$600,000 (one-time)
4	Large scale stormwater projects in collaboration with County Road and Parks projects	Design and contracted services to perform planning and preliminary design for one (1) collaborative, large-scale stormwater, roads, and parks project. <i>This item does not include revenue for construction.</i>	2028	\$500,000
5	Public Involvement for Community Engagement and Inclusion	Dedicated staff resource to provide administrative support for expanded services in Community Engagement & Inclusion division	2026	\$481,800
6	Program Assistance	Dedicated staff resource to provide administrative support for Clean Water Division staff	2026	\$375,000



## Additional Services (10)– what does the rate increase pay for?

No.	New or Increased Service	Description	Starting Year	Total Cost for Service through 2029
7	Laboratory Contract Expansion	Contracted laboratory services for increased TMDL, Lakes, Stormwater, Maintenance, Compliance assessment, and Pollution Identification & Correction monitoring.	2025	\$318,000
8	Large scale neighborhood drainage and flooding improvements	Design and contracted services to perform planning and preliminary design for one (1) large-scale neighborhood drainage improvement project. <i>This item does not include revenue for full design or construction.</i>	2027	\$300,000
9	Nature Based Solutions Capital Restoration Planning	Dedicated staff resource for increased coordination and delivery of nature-based wetland, floodplain, reforestation projects	2028	\$252,500
10	Noxious weed management - Vehicle	(1) Noxious weed management on 96 clean water parcels that aren't currently maintained	2027	\$74,000 (one-time and ER&R)



# Environmental Justice & Watershed Health Work Group



# New 2024 NPDES Phase 1 Permit Update

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# Summary

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- **Multiple new requirements!**
- **Effective Date:** August 1, 2024
- **Expiration Date:** July 31, 2029
- **Annual Deliverables**
  - *Stormwater Management Plan*
  - *Annual Report*



# New NPDES Permit Requirements

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## Education & Outreach

- Update Social Marketing Campaign
- Implement Behavior Change Campaign
- Overburdened Community Public Involvement
- Behavior Change Evaluation
- PCB Source Control BMPs for Property Managers
- Inventory & Source Control Requirements for PFAS

## Strategic Planning & Programming

- Stormwater Management Action Plan (SMAP)
- Establish Tree Canopy Goals & Policies
- Renew Interdepartmental Agreements

## Administration

- New Expense Reporting Requirements
- Records Retention Changes

## Mapping

- Outfall Data Submittal
- Outfall & Treatment Catchment Mapping
- MS4 Mapping in Rural Area (Ditches & Culverts)
- Overburdened Community Mapping
- Tree Canopy Mapping for County Properties
- MS4 Connections to Private Systems

## Operations & Maintenance + Capital Implementation

- Street Sweeping Implementation
- Street Sweeping Reporting
- Street Sweeping Standards
- Enhanced Sweeping Plan
- Stormwater Management for Existing Development (SMED) Points increased to 1,000 pts.
- Operations & Maintenance Training



# Division Manager's Update

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# Overview

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- 2024 Rate Study Presentation
- Lakes Updates
- RFP Updates
- Other



# 2024 Rate Study Update



# Lakes Update



# Scope of Work – County Coordination

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1. Public Participation Plan & Technical Advisory Group
2. Framework for Special District
3. Beach Algaecide Treatment Plan
4. Flushing Enhancements
5. Watershed Implementation



# Technical Advisory Group Meeting

*Wednesday June 12 at Port of Vancouver from 10am-12pm*

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## **Meeting Goals:**

- Guidance for TAG Participation
- Background on Phase I
- Scope of Phase 2
- Focus on Beach Management Plan for 2025

## **25+ People RSVP'd**

*Friends of Vancouver Lake, Rowing Club, Port of Vancouver, Ridgefield, Vancouver, County, WDFW, Ecology, Watershed Alliance, etc.*

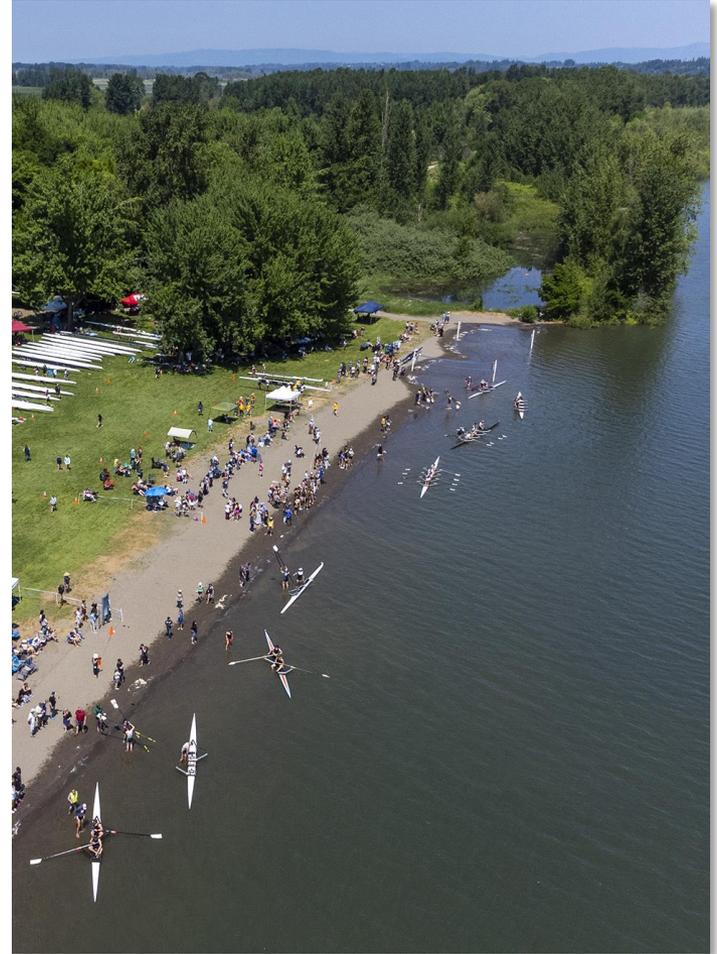
**Next meeting(s):** Focus on Flushing Enhancement in September, January, and May



# Beach Management Plan

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- Planning
- Permitting
- Mobilization
- Implementation
- Monitoring



## Second algae treatment planned for today at Vancouver Lake swim beach Free

By Amy Libby, Columbian Web Editor  
Published: August 2, 2024, 7:47 am

Share: [f](#) [X](#) [@](#) [in](#) [p](#) [✉](#)



Blue-green algae can pose a significant health risk if cyanobacteriaz or toxins are ingested, inhaled or come into contact with skin. (Clark County Public Health)

## Clark County takes proactive approach to Vancouver Lake's algae blooms

It applies algacide in effort to prevent formation of blooms

By Shari Phiel, Columbian staff writer  
Published: July 25, 2024, 5:03 pm

Share: [f](#) [X](#) [@](#) [in](#) [p](#) [✉](#)



# KPTV Coverage



- [https://youtu.be/g5Lt19\\_dDYM?si=9vBmbbZcRXQKO8\\_X](https://youtu.be/g5Lt19_dDYM?si=9vBmbbZcRXQKO8_X)



# Flushing Enhancements – Sept. 18 TAG meeting

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- Evaluate alternatives
- Select preferred alternative
- Refine modeling
- Conceptual design
- Cost estimates



# RFP Updates



# RFPs / Professional Services Contracts

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**Vancouver Lake Management Plan Implementation – *Done!***



**Stormwater Code and Manual Update – *Done!***



**Bioretention Maintenance Plan – *Done!***



**Design Services Support & Stormwater Management Action Plan - *November 2024***

# FY 2025 Grant Awards

- Heritage Farm
- Follow the Water
- PoopSmart Clark



# Other

## Hiring Natural Resource Specialist II 2-year Project Position



# Roundtable Discussion Commissioner's Comments



# Meeting Adjourned

## Thank you!



# Appendix Slides

## NPDES Permit Details



## S5.A.2 Expense Reporting Starting in 2026

The 2019 permit required permittee to track or estimate expenses by permit component (S5.C.1 to S5.C.11 and S8). The 2024 permit requires reporting expenses which is problematic because there is no uniform way of doing it among permittees. It also requires reporting revenue sources. The first reporting date is the 2026 annual report in March 2027.

## S5.C.2.a.ix. Mapping Connections to Private Systems

This is currently known by maintenance owner but there are no separate mapped points for these connections.

## S5.C.2.b.i Outfall Data Submittal by March 2026

The permit requires submittal of all outfall locations and associated asset data information by March 2026. We currently only submit new outfalls created during the permit term.

## S5.C.2.b.ii. Canopy Mapping for County Properties by December 31, 2026

Create a method and map tree canopy for county properties by December 31, 2026 and update it annually.



### S5.C.2.b.iii Outfall and Treatment Catchment Mapping by March 2028

This new element requires submittal of mapping showing MS4 outfall areas with treatment and flow control BMPs. Provide maps and tables of the areas treated and untreated within outfall catchments. Outfalls are the MS4 discharges to a natural drainageway that is not part of the MS4.

The outfall catchments are mostly mapped for the urban areas but not areas lacking piped drainage. Facility catchments are partially mapped in the urban area. This only applies to outfalls 24 inches or larger.

### S5.C.2.b.iv Overburdened Community Mapping by December 31, 2028

A new requirement to map overburdened communities in relation to the MS4 characteristics and tree canopy on county lands. This could be adding a GIS layer to compare to the MS4.

### S5.C.2.b.v Complete MS4 Mapping in the Rural Area by December 31, 2028

The previous requirement was half of the rural area. We have a project to field verify remote sensing ditch mapping.



### S5.C.3. Update Interdepartmental Agreements by March 31, 2026

There are agreements within Public Works and between Public Works and other departments to implement the permit. These all need to be updated.

### S5.C.4.a Overburdened Community Public Involvement by December 31, 2026

The permittee must document specific opportunities to involve overburdened communities in the permit program and the SMAP. This includes an annual update.

### S5.C.5.a Code and Manual Update by July 2026

Submit a table showing how the mandatory changes and a table showing how significant changes proposed by Clark will be included in the code and manual by June 30, 2025. The revised code and manual must be implemented by July 1, 2026.

### S5.C.6.c.ii Adopt and Implement Tree Canopy Goals by December 2028

The permittee is required to adopt and implement tree canopy goals and policies to support water quality improvement in receiving waters. The goals and policies apply to both all lands and county lands.

This is a requirement that goes beyond the scope of managing the MS4.



### S5.C.6.d Complete another SMAP Plan by March 31, 2027

The 2019 permit required counties to do a Stormwater Management Action Plan (SMAP) for a priority catchment. This permit requires permittees to either add another SMAP catchment area plan or add actions to the 2019 permit plan by December 2027.

The permit asks that the plan should add projects to address high traffic area pollutants and actions that will benefit overburdened communities.

### S5.C.7 Obtain 1000 Stormwater Management for Existing Development (SMED) Points by March 31, 2028

The number of points required is increased to 1000 for the permit term and can include projects completed after December 31, 2022 (2019 permit). However, the multipliers are increased as well, making the increased point requirement less of an issue. 275 points must be for actual retrofit projects either design points or construction. 400 points are required for completed projects.

Points can be for projects in design, projects completed and for sweeping above permit requirements. The points allowed for sweeping depends on the amount of sweeping performed under the maintenance requirements. The permit calls for four times a year for high priority areas, which generally excludes local access roads in neighborhoods.



### S5.C.9 Illicit Connections and Illicit Discharge Elimination IDDE Program

Language is added to address firefighting discharges with PFAS foam by requiring permittee coordination with emergency responders by December 31, 2026. Also, by January 1, 2027, permittees must update procedures for minimizing PFAS to the MS4.

Language is also added to 13.26A to address PCBs during building cleaning or demolition following the Ecology guidance document.

### S5.C.10.f Sweeping Standards and Plan Implemented by July 2027

The permit added street sweeping as a requirement. This includes making and implementing a plan by July 1, 2027 to sweep priority areas discharging to outfalls. Priority areas are high traffic roads, high tire wear areas such as intersections and roundabouts, tree leaf area, and roads in commercial or industrial areas.

Priority areas must be swept four times per year and once during summer months (July, August and September).

The sweeping must start by July 2027 but we should be able to count earlier sweeping in the SMED points reporting starting in August 2024.

Record keeping for permit compliance is going to be complicated due to the mix of outfall catchments and areas not draining to outfalls. Also, are only areas draining to outfalls counted for SMED points?



### S5.C.10.f.v. Sweeping Reporting Starting March 31, 2028

The permit has detailed sweeping reporting requirements starting in March 2028, including:

- Areas swept
- Sweeping dates
- Sweeping frequency
- Type of sweeper
- Total curb miles of priority area
- Total priority curb miles swept
- Amount of material for each sweeping event (4 required per year)

### S5.C.10.h. O and M Training

The permit adds more specific language for training that could require a more structured training program than currently in place. It seems like this is an opportunity to have regional or shared training programs.

### S5.C.11.a.i(b) PCB BMP E and O for Persons Who Develop or Manage Property

The permit adds PCB pollution control BMPs to the education program.

PCBs in the environment have been an issue for years with little to no public information. Now with the stormwater permit, PCBs in building materials suddenly becomes an E and O issue.



### S5.C.11.a.ii (b) Social Marketing

Update the social marketing campaign based on the recommendations from the 2024 report by July 2025.

### S5.C.11.a.ii(c) Behavior Change Campaign

No later than September 1, 2025, begin implementing the strategy above.

### S5.C.11.a.ii(d) Behavioral Change Campaign Evaluation by March 2029

Submit a report with the March 2029 annual report.

## S8 Monitoring and Assessment

This permit has no monitoring requirements except for monetary contributions to the Ecology pooled monitoring fund in amounts specified in Appendix 11.

## S9.B Records Retention

The record retention requirement is changed from five years to five years after the permit expires. Every record thing form 2024-on would be retained until the end of 2034.

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