



Staff Report

June 6, 2022 Council Workshop Meeting

Stormwater Source Control Interlocal Agreement

Presenter: Steve Wall, Public Works Director

Time Estimate: 5 min

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BACKGROUND: The City's Stormwater National Pollutant Discharge Elimination System (NPDES) Permit mandates the City to implement a program requiring the application of what are referred to as "Source Control Best Management Practices (BMP)" for pollutant generating sources associated with existing land uses and activities. A BMP may be an activity, a maintenance procedure, a physical or structural device, or a management practice used to prevent or reduce the release of pollutants into stormwater. The Source Control program is required to be in place no later than January 1, 2023.

Clark County Public Health (CCPH) is funded by Washington State Department of Ecology (Ecology) to implement the Pollution Prevention Assistance Program (PPA). The PPA is a program that offers free, hands-on assistance to help businesses find and resolve potential pollution issues. CCPH has inspected a number of businesses in the City since 2017 as part of the program.

SUMMARY: The City and CCPH have drafted a Stormwater Source Control Interlocal Agreement that stipulate terms that would help the City meet our own NPDES Permit source control requirements. CCPH has submitted a new contract to Ecology requesting additional funding to assist the City with site inspections. We anticipate the additional funding will be approved by Ecology. The increased PPA funding will allow CCPH to hire one additional full-time employee to assist Camas staff with source control inspections. Education and outreach and voluntary compliance is always the preferred option to resolve potential pollution concerns; however, should any type of enforcement be needed, CCPH will refer any actions to City Staff.

EQUITY CONSIDERATIONS:

What are the desired results and outcomes for this agenda item?

This Stormwater Source Control Interlocal Agreement will help the City meet the source control inspection requirements of the NPDES Permit.

What's the data? What does the data tell us?

The Source Control Program, through inspections, will help the City identify and eliminate stormwater pollution.

How have communities been engaged? Are there opportunities to expand engagement?

Clark County Public Health performed inspections at commercial and industrial properties in the City in previous years under the Pollution Prevention Assistance (PPA) program. The PPA specialists offer free, hands-on assistance to help businesses find and resolve potential pollution issues (no formal enforcements).

Who will benefit from, or be burdened by this agenda item?

Limiting pollution discharge will benefit the general public, environment and natural resources. Providing businesses and establishments technical recommendations on source control BMPs through inspections will reduce pollution discharge and help the owner resolve onsite pollution issues.

What are the strategies to mitigate any unintended consequences?

The business owners may find it intrusive. However, the intent is to use education and outreach strategies first and start by offering the business owners technical assistance on any drainage or pollution generating issues they may have on their property.

Does this agenda item have a differential impact on underserved populations, people living with disabilities, and/or communities of color? Please provide available data to illustrate this impact.

N/A

Will this agenda item improve ADA accessibilities for people with disabilities?

N/A

What potential hurdles exist in implementing this proposal (include both operational and political)?

The businesses may deny entry at time of inspection and may not want to implement the recommended source control BMPs. In these types of situations, staff will continue educating and working with the business to help them understand the importance of the topic and ultimately that changes are a requirement of the City and the State.

How will you ensure accountabilities, communicate, and evaluate results?

Staff will keep records of all inspections, follow ups, denials and re-inspections. Staff will perform follow up inspections to ensure the recommended BMPs are implemented.

How does this item support a comprehensive plan goal, policy or other adopted resolution?

This interlocal agreement will help us meet the City's Stormwater NPDES Permit requirements.

BUDGET IMPACT: This interlocal agreement has no budget impacts. Existing staff will be used to develop, implement and monitor the program.

RECOMMENDATION: This item is for Council's information only. Staff recommends the Interlocal Agreement be placed on the June 21, 2022 Regular Council Meeting Consent Agenda for Council's consideration.