



Staff Report

April 4, 2022 Council Workshop Meeting

Stormwater Source Control Revisions, CMC 14.04

Presenter: Steve Wall, Public Works Director and Jackie Caldwell, Stormwater Engineer

Time Estimate: 10 min

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BACKGROUND: The City’s Stormwater National Pollutant Discharge Elimination System (NPDES) Permit mandates the City adopt an ordinance 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 ordinance is required to be in place no later than August 1, 2022.

SUMMARY: Staff has drafted the attached revisions to Camas Municipal Code, Chapter 14.04, including a change in name of the Chapter to “Water Resources Protection”. The current Code provides important regulations regarding illicit discharges (discharges to the City’s system other than stormwater), but the revisions in the attached draft will broaden the Chapter to include both illicit discharges and BMPs, and to meet the requirements of the City’s Permit. The revised Chapter 14.04 will enable the City to meet its obligation to implement a source control program that includes inspections of pollutant generating sources at publicly and privately owned institutional, commercial and industrial sites and enforcement of implementation of the required BMPs.

EQUITY CONSIDERATIONS:

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

This Municipal Code revision will help enforce the implementation of required BMPs to control pollution discharge into the City’s stormwater system.

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

The City’s NPDES Permit requires adoption of a Source Control Program.

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 exists 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 code revision will help us meet the NPDES Permit requirements.

BUDGET IMPACT: This code revision 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 Council approve the revisions to CMC Chapter 14.04 at the April 18, 2022 Regular Council Meeting