

Clark County Muni Stormwater Permit Compliance Evaluation:

Clark County responses: blue

Ecology meeting notes: brown

- **Introductions**
 - Ecology
 - Noosheen Pouya
 - County
 - Rod Swanson
 - Jeff Schnabel
- **G19 and ESAF**
 - Any updates needed to G19 letters or ESAFs?—Changes in staff?
- None
- **Overview of the County's SWMP/Legal Authority**
 - Great history on the program, good detail provided, thank you!
 - Out of curiosity, what programs does the County implement countywide (versus within the permit area)
- Education/Outreach is regional, and one element includes the Portland/SW Washington region
 - Pet waste ad campaign, right?
- Monitoring under the Ecology contract is county-wide
- Stormwater Partners
- The Stream Health report is county-wide (not a permit thing)
 - This effort is the summary of the data produced every few years that the County collects on 10 streams in Clark County.
- There are other municipal users of the road waste management facility
 - Other permittees use Clark County's facility as well.
- Numerous E and O activities are regional, one includes the entire metro region
 - The County's codes are implemented county wide even when not attached to their MS4.
- How has the County's involvement in regional meetings helped lately?
- Mainly sharing information on approaches
 - The group also shares strategies on how to approach education and outreach requirements.
- How often are various trainings conducted for staff?
- It depends. Many staff have been doing their jobs for years. New employees get trained as they enter. Routing training on illicit discharge awareness for field staff.

- Generally training is mostly done on the job, but awareness training is conducted for all field staff.
 - Overall, how is the permit implementation schedule going given COVID-19?
- It has been a major problem for field work but we are meeting requirements.
 - The County was able to focus efforts on its regulated facilities. At the end of last year's work, there had been no defects in its facilities in 2 years.
- **MS4 Mapping**
 - Q5—Answered Yes. What is the County's current status on mapping outfall size and material?
- The pipe material and diameter is part of the asset inventory for the pipe, as such it is entered into GIS when project record drawings become available.
- What does Ecology intend to do with the data and how will it be used?
 - Since the permit does say a spreadsheet must be submitted, I would recommend attaching the newly added data since January 2020, and a link to the online maps/data as you mentioned.
- **Coordination**
 - Q9—Answered Yes. Out of curiosity, how often do these types of discussions on roles and responsibilities take place with other entities? Is it more on an as-needed basis?
- We have our quarterly permittee meetings, Stormwater Partnership meetings as needed and activity-related meetings and conversations as needed.
 - The Stormwater Partnership meeting are more general meetings than the SW Partners. SW Partners is focused a lot on education and outreach.
- **Public Participation**
 - Q11—Does the County have any communities that meet the EPA definition of an "overburdened community" (this is defined on page 53 of 56 in the Phase II Permit). (this is defined on page 53 of 56 in the Phase II Permit). What resources did you check to determine this?
- The permit provides a narrative description but not one easily applied to the available data. This is something permittees struggle with in the context of the stormwater program.
 - We talked about two resources that use certain parameters to create this as an index, such as EJ Screen and Washington Disparities Map. There are ongoing conversations between the permittees on how to integrate these ideas into the SW Permit. Ideas have been things such as looking for opportunities to retrofit for stormwater and provide sidewalk access.
 - Are the Clean Water Commission and Planning Commission meetings available online for the public (either live or after the event)?
- Clean Water Commission is taped and Planning Commission is video (not sure what they do with WebEx) and has a court reporter.
- **Controlling Runoff from New Dev., Redev, and Construction Sites**

- Q13/14—Can you provide a quick update on the County’s manual equivalency process?
- Planning Commission hearing in March, BOCC hearing in May, effective date July 1, 2021.
 - WORK SESSION HAPPENED LAST WEEK, HEARING ON THE 18
 - Q16—Out of curiosity, what types of projects were the 3 adjustments granted for?
- The report has 0 for Q16
 - Apologies, this was my mistake. Q16 referred to exceptions/variances, of which the County granted 2. The County has only recently started to grant these types of changes to the minimum requirements.
 - Q17a—That is quite a few projects to review in 2019. Does this include individual housing sites as well?
- Every home construction permit application is a development project under the permit
 - Under Clark County code, even home additions are projects.
- Q23—3,851 enforcement actions taken in 2019. What were some common offenses?
- Almost all are erosion control correction notices for home building projects or other projects on existing lots.
 - Process for correction notices—reinspections and fee associated.
- Q24—How does the County track their inspections and calculate the percentage achieved?
- There is a land management system that tracks all parcel-based development activities.
- **Stormwater Planning**
 - Q37—How is the assessment to identify any administrative or regulatory barriers to implementation of LID Principles/BMPs conducted?
- I interview planners and engineers who review development project applications and plans. The report that no applicants complain about barriers to LID.
- **Structural Stormwater Controls**
 - Q43/43a— In the 2019 Q43a attachment, the SSC Program Point estimates add up to 289. Is the County still on track to achieve the required 300 SSC Program Points (275 design-stage retrofit and 75 complete or maintenance stage) by December 31, 2022?
- Yes
 - The County will be adding in annual street sweeping activities to bring the total up to the required 300.
- **Source Control for Existing Businesses**
 - When does the County anticipate conducting the next update of the source control inventory?
- It will likely be updated sometime this year by GIS. We separate the MS4 from non-MS4 sites to split areas with County Health on the LSC/PPA work.

- The County uses business personal property tax data, and fire marshal data to map out sites. They split work with County Health. County health focuses on sites that go into dry wells, and the County focuses on those that go into waterways.
- **IDDE**
 - How is the County planning for new submission through WQWebIDDE?
- We have a database that is identical. Actually, the final Ecology data schema is based on Clark County revisions to the draft published by Ecology. We were using it before the permit was issued.
 - Thank you for providing this history!
- **Operations and Maintenance**
 - Q61—You responded Yes, you applied maintenance standards for facilities who do not have standards specified in the SWMMWW equivalency Clark County Manual, but did not include a comment on what kinds of facilities are covered by the alternative standards.
- Hum, I usually copy and paste from the previous year. Must have missed it?
 - This will be fixed next year, but facilities like dry wells are not included in the SWMMWW.
 - Q76—How many SWPPPs does the County have currently? Do you anticipate needing to update any existing SWPPPs?
- All of the maintenance yards, six of them. There are also sites with industrial permits under the sand and gravel permit. And the Salmon Creek Treatment Plant has an industrial stormwater permit.
- **Education and Outreach**
 - Q79: Answered No— The County did not evaluate the effectiveness of an ongoing behavior change program. Did Clark County start a new behavior change campaign? The attachment you provided for Q79 appears to be for a different question. It reads “Clark County enters the size and material of conveyance system outfall points when they are entered into the StormwaterClk GIS database.” If this is not correct, what information was meant to be provided in this attachment?
- This was a mistake. I added comments to elaborate on No answers where we are permit compliant. This should have said we were pursuing S5.C.11.iv.
 - The County started/revamped a pet waste campaign
 - Q83/83a—Out of curiosity, are these stewardship opportunities provided at certain times of year (under normal circumstances)?
- Earth day is on Earth Day
- Beach clean up, I do not know
- Medallions all year
 - This programs operates on an on demand basis.

- I reviewed the outreach emails you forwarded on the video contest and pollution prevention webinars. Thank you for providing those great examples!
- Great.
- **Notifications to Ecology**
 - I will provide slides to review types of notifications: G3, G20, S4.F
 - Q88—Answered Yes (G3s)
 - Q90—Answered N/A(S4.F)
 - Q93—Answered N/A (G20s)

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