

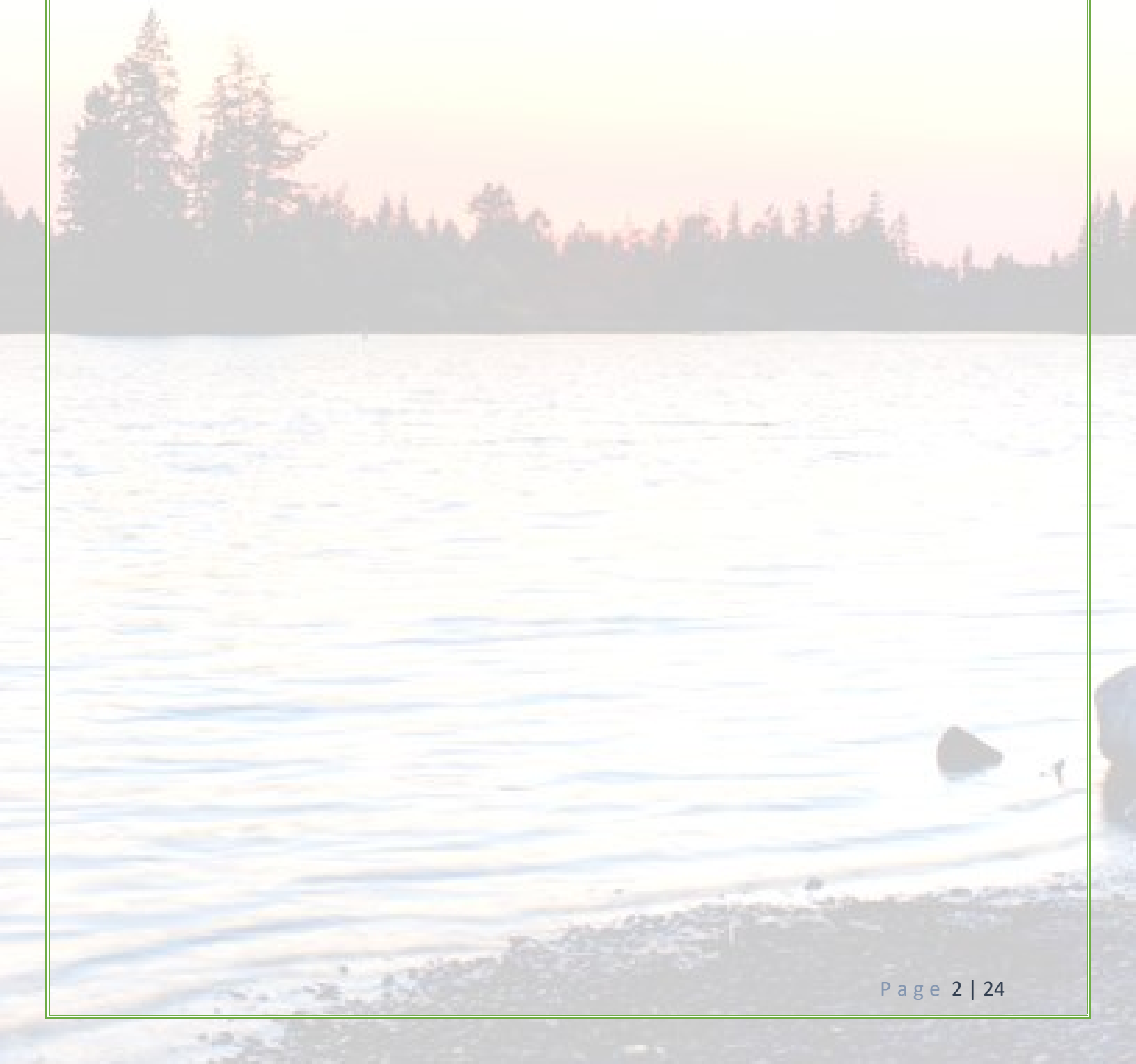
Stormwater Management Program

2025

City of Camas
Stormwater Division | Public Works



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Introduction



The National Pollutant Discharge Elimination System (NPDES) Permit addresses water pollution from point sources into surface waters, such as rivers, lakes, and streams. The U.S. Environmental Protection Agency (EPA) gave the Washington State Department of Ecology (Ecology) authority to write and issue the NPDES Permit in Washington State. The Western Washington Phase II Municipal Stormwater Permit (Permit) was first issued by Ecology in 2007.

The City of Camas (City) Municipal Separate Storm Sewer System (MS4) is regulated by the Permit. This Annual Report covers implementation of components from the 2019-2024 Permit, as well as the 2024-2029 Permit. The 2019-2024 Permit was reissued on July 1, 2019, and became effective August 1, 2019. The permit cycle was from July 1, 2019, to July 31, 2024. The 2024-2029 Permit was reissued on July 1, 2024, and became effective August 1, 2024. The Permit cycle is from August 1, 2024, to July 31, 2029. The City will continue to implement current programs and include new permit requirements as they come into effect.

The Stormwater Management Program (SWMP) is required per Section S5 of the Permit. The SWMP is organized per the program components listed in S5.C. The SWMP is updated annually and submitted to Ecology by March 31st of each year. The SWMP consists of the following components (program components, current activities and planned activities are discussed in the SWMP):

- S5.C.1 Stormwater Planning
- S5.C.2 Public Education and Outreach
- S5.C.3 Public Involvement and Participation
- S5.C.4 MS4 Mapping and Documentation
- S5.C.5 Illicit Discharge Detection and Elimination
- S5.C.6 Controlling Runoff from New Development, Redevelopment, and Construction Sites
- S5.C.7 Stormwater Management for Existing Development
- S5.C.8 Source Control Program for Existing Development
- S5.C.9 Operations and Maintenance

The SWMP is designed to protect water quality by reducing the discharge of pollutants from the regulated small MS4 to the maximum extent practicable (MEP) and meet state all known, available, and reasonable methods of prevention, control, and treatment (AKART) requirements, and protect water quality.

The City has an ongoing program for gathering, tracking, maintaining and using information to evaluate the SWMP development, implementation, permit compliance, and to set priorities.

The SWMP is a planning and implementation document. The program has three separate objectives depending on the intended audience:

- Ecology – Provide written documentation on how the City will meet the permit requirements for the SWMP.
- The Public – Solicit input and build local support for the City's SWMP.
- City Staff and Officials – Build support and understanding for the SWMP.

S5.C.1 Stormwater Planning

The City has three distinct watersheds: the Lacamas Lake Basin, the Columbia River Basin and the Washougal River Basin. The three watersheds ultimately drain into the Pacific Ocean. The City has been rapidly growing since 2015, adding a significant amount of both new people and infrastructure to the City's watersheds. A Comprehensive Stormwater Plan was developed in 2013 to plan for new stormwater regulations and future capital improvements that would help meet the City's goals and growth demands. The Stormwater Planning Program is to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters.

PERMIT REQUIREMENTS (S5.C.1):

- a. Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.
- b. Coordination with long-range plan updates:
 - Describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies. Annual reports shall describe the water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning, considering stormwater management needs or limitations.
- c. Low impact development (LID) code-related requirements:
 - Continue to require LID Principles and LID Best Management Practices (BMPs) when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed. The intent shall be to make LID the preferred and commonly used approach to site development.
- d. Stormwater Management Action Planning (SMAP):

No later than March 31, 2027, develop a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP, that identifies all the following:

 - Annually, assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes were updated in accordance with the 2013 Permit, and the measures developed to address the barriers. If applicable, the report shall describe mechanisms adopted to encourage or require implementation of LID principles or LID BMPs.
 - No later than December 31, 2028, adopt and implement tree canopy goals and policies to support stormwater management.
 - Establish a long term (e.g. 5, 10 year or longer) goal of canopy, existing or future projection, to be used for stormwater management.
 - Specific considerations for canopy for stormwater management on Permittee-owned or operated lands shall include:
 - Maintaining or increasing canopy in overburdened communities.
 - Maintaining existing mature canopy.
 - Document considerations, reasoning, and rationale for goals and polices.

projects that address transportation-related runoff from high traffic areas.

- Land management/development strategies and/or actions identified for water quality management.
- Focused, enhanced, or customized implementation of stormwater management actions related to permit sections within S5, including: IDDE field screening, Prioritization of Source Control inspections, O&M inspections or enhanced maintenance, Public Education and Outreach behavior change programs. Identified actions shall support other specifically identified stormwater management strategies and actions for the basin overall, or for the catchment area in particular.
- If applicable, identification of changes needed to local long-range plans, to address SMAP priorities.
- A proposed implementation schedule and budget sources for: short-term actions (accomplished within six years), long-term actions (accomplished within seven to 20 years).
- Actions in the SMAP that may benefit overburdened communities, including specifically vulnerable populations and highly impacted Communities.
- A process and schedule to provide future assessment and feedback to improve the planning process and implementation of procedures or projects.

CURRENT ACTIVITIES (S5.C.1):

The City's Stormwater Control Ordinance (CMC 14.02) will maintain the requirements for LID Principles and LID BMPs in all developments within city limits.

The City interdisciplinary team will continue to collaborate in the stormwater planning process. The core team members include the Public Works Director, Utilities Manager, Operations Supervisor and Stormwater Permit Coordinator. Other departments may be involved, as needed. City Council and stakeholders will be notified and part of the decision-making process as planning progresses.

The Department of Ecology awarded the City two Water Quality Combined Funding Grants; the City of Camas Downtown Regional Stormwater Retrofit Project and the City of Camas Crown Park Regional Stormwater Retrofit Project. These projects were identified in the previous SMAP process. The grant funds will help the City complete the planning and design phases of the two projects. The projects will provide treatment of stormwater from 216 acres of largely untreated area.

PLANNED ACTIVITIES (S5.C.1):

The City's short-term actions in support of stormwater facility retrofits will be detailed feasibility reviews to identify and prioritize retrofit projects for the long-term planning of the SMAP.

The City is working to adopt and implement tree canopy goals and policies to support stormwater management, and will establish long-term goals of canopy, existing or future projection for City owned or operated lands. Goals and policies will be adopted no later than December 31, 2028.

The City will complete and submit a SMAP for one new high priority catchment area, or additional actions for the Upper Camas Slough priority catchment area. A new SMAP or additional actions to existing SMAP will be completed no later than March 31, 2027.

S5.C.2 Public Education & Outreach

The City continues to implement an education and outreach program for the area served by the MS4. The Education and Outreach Program is designed to build general awareness about methods to address and reduce impacts from stormwater runoff, effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts, and create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

PERMIT REQUIREMENTS (S5.C.2):

Implement an education and outreach program for the area served by the MS4. The program design shall be based on local or regional water quality information and priority audience characteristics to identify high priority audiences, subject areas, and/or BMPs.

a. General Awareness: Annually select, at a minimum, one priority audience and one subject:

- *Priority audience:* General Public (including overburden communities, school age children, college/university, or trade students), or Businesses (including home-based and mobile businesses).

Subject areas:

- 1) General impacts of stormwater on surface waters, including impacts from impervious surfaces.
- 2) Low impact development (LID) principles and LID BMPs.

- *Priority audience:* Engineers, contractors, developers, property owners/managers, or Land-use Planners.

Subject areas:

- 1) Technical standards for stormwater site and erosion control plans.
- 2) LID principles and LID BMPs.

- 3) Stormwater treatment and flow control BMPs/facilities.
- 4) Source control BMPs for building materials to reduce pollution to reduce pollution to stormwater, including but not limited to stormwater pollution from BPC-containing materials.

- Provide subject area information to the target audience on an ongoing or strategic schedule.

b. Behavior Change: To affect behavior change, Permittees shall select, at a minimum, one priority audience and one BMP.

- *Priority audience;* Residents, landscapers, property managers/owners, developers, school age children, college/university, trade students, or businesses (including home-based or mobile businesses).

BMPs:

- 1) Use and storage of: pesticides, fertilizers, and/or other household chemicals.
- 2) Use and storage of: automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials.
- 3) Prevention of illicit discharges.
- 4) Yard care techniques protective of water quality.
- 5) Carpet cleaning.
- 6) Repair and maintenance BMPs for: vehicles, equipment, and/or home/building.
- 7) Pet waste management and disposal.
- 8) LID Principles and LID BMPs.
- 9) Stormwater facility maintenance, include LID facilities.
- 10) Dumpster and trash compactor maintenance.
- 11) Litter and debris prevention.
- 12) Sediment and erosion control.

13) Source Control BMPs.

14) Locally-important, municipal stormwater-related subject area.

- Social marketing campaign development. No later than July 1, 2025, each Permittee shall follow social marketing practices and methods and develop a campaign that is tailored to the community, including development of a program evaluation plan.
- Behavior change campaign implementation. No later than September 1, 2025, begin to implement the developed strategy.
- Behavior change campaign evaluation. No later than March 31, 2029, evaluate and submit a report on the changes in understanding and adoption of behaviors resulting from the implementation of the strategy; and any planned or recommended changes to the campaign to be more effective; describe the strategies and process to achieve the results.
- Behavior change campaign adaptive management. Permittees shall use results of the evaluation to continue to direct effective methods and implementation of the ongoing behavior change program.

c. Stewardship: Provide and advertise stewardship opportunities and/or partner with existing organizations (including non-permittees) to encourage residents to participate in activities or events planned and organized within the community.

CURRENT ACTIVITIES (S5.C.2):

General Awareness – General Public:

- Participated in tree planting events along Everett Street corridor.
- Maintain stormwater website.
- Pet waste management and disposal.
- Proper disposal of household hazardous waste.
- Prohibit illegal dumping and littering in stormwater facilities.

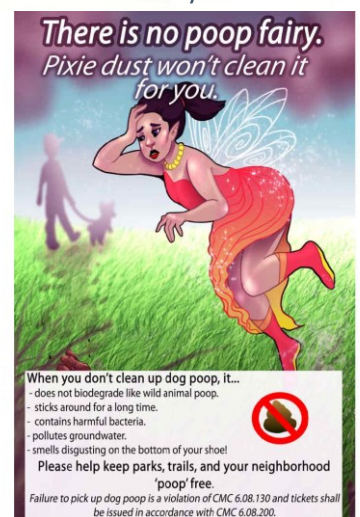
- Illicit discharge hotline and flyer.
- KPTV ‘Clean Water’ public service announcement campaign.
- Student Video Contest for grades 6-12.
- Neighborhood meetings for non-HOA .neighborhoods to educate property owners on stormwater facility ownership, responsibilities and maintenance.
- Frequent stormwater social media post.
- Labeling events at Camas Farmers Market to spread the word on Private Stormwater Facilities, IDDE, Poop Smart, Don’t Drip and Drive and other stormwater program activities.

General Awareness – Engineers, contractors, developers, property managers land use planners:

- City staff assist teaching Vegetated Stormwater Facilities Maintenance course at Clackamas Community College.

Behavior Change:

Pet waste is an ongoing issue in the City. The City evaluated the existing pet waste program and decided to continue to tackle the pet waste issue. The City has joined forces with Clark County and neighboring cities to promote pet waste management with the Canines for Clean Water Campaign. The team developed a behavior change campaign strategy and schedule. The City continues to implement the strategy developed for the pet waste management campaign. The City hands out “There is no poop fairy” signs to residents and HOA’s that experience excessive dog poop on lawns and in public spaces.



Stewardships:

- Doody Pledge
- Backyard Habitat Certification Program
- Ivy League
- Lacamas Lake Clean-up
- Student Video Contest
- Adopt a Drain



The City is launching an Adopt a Drain Program in 2025. This program asks residents to adopt a storm drain in their neighborhood and keep it clear of leaves, trash, and other debris to reduce water pollution and help prevent localized flooding.

Stormwater Partners are partnering with the Watershed Alliance to build general awareness on impacts of stormwater on surface waters, LID, and introducing college/university students to different careers in stormwater.



PLANNED ACTIVITIES (S5.C.2):

The City will continue to implement the Current Activities.

Closing dumpster lids is the focus of the next behavior change campaign. The City is working with other jurisdictions in Clark County for the behavior change campaign.

C5.C.3 Public Involvement & Participation

The City continues to provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees and other similar activities. The City complies with applicable state and local public notice requirements when developing elements of the SWMP and SMAP.

PERMIT REQUIREMENTS (S5.C.3):

a. Create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementing and update of the SMAP and SWAP. Specific outreach measures shall be documented for overburdened communities.

- I. Annually, document specific public involvement and participation opportunities provided to overburdened communities and specifically highly impacted communities.
- II. No later than December 31, 2026, document methods used to identify overburdened communities.

b. The City shall post the SWMP Plan and the annual report on the website, no later than May 31st of each year. All other submittals shall be available to the public upon request.



CURRENT ACTIVITIES (\$5.C.3)

The City utilizes various communication mediums to convey involvement and participation events to the public, such as: social media, City website, newspaper articles and other web-based channels. The City posts the latest annual report and Stormwater Management Program (SWMP) on the website by March 31st each year. When the updated SWMP is posted on the City’s website, a newsfeed is generated to notify the public and request for comments on the SWMP.



Dana – Silver Certified

The City generates monthly to quarterly stormwater related topics and posts on City’s social media to promote education and awareness. A link to the SWMP and SMAP are included in the post to help generate awareness and opportunity for the public to provide comments.

PLANNED ACTIVITIES (\$5.C.3):

The City will continue to implement the Current Activities and explore other means of public involvement opportunities. The public was a key stakeholder that we asked for input during the first SMAP process. Environmental justice data was incorporated in the development of the SMAP.

The City will continue to incorporate feedback from stakeholders in SMAP developments and decision making processes.

The City will document specific public involvement and participation opportunities provided to overburdened communities and specifically highly impacted communities.

The City will document methods used to identify overburdened communities no later than December 31, 2026.

Volunteer with us!
SATURDAY
OCTOBER 26
9 AM - NOON

Let's Pull Together!

THE IVY LEAGUE
- CAMAS -

Meet at NE 7th Ave.
between Birch and Dallas
<https://maps.app.goo.gl/jtC9yqjECLgUpRc8>

EVERYONE WELCOME

- Bring Tools/Gloves if you have them -- and if not, we do
- Dress for the weather and woody conditions
- Hot coffee/cocoa, water & snacks for volunteers

THANK YOU SPONSORS!

Camas Parks Foundation | City of Camas WASHINGTON | Rotary Club of Camas-Washougal | CAMAS WASHOUGAL COMMUNITY CHEST



S5.C.4 MS4 Mapping and Documentation

The City has an ongoing program for mapping and documentation of the MS4.

PERMIT REQUIREMENTS (S5.C.4):

a. Ongoing Mapping of MS4:

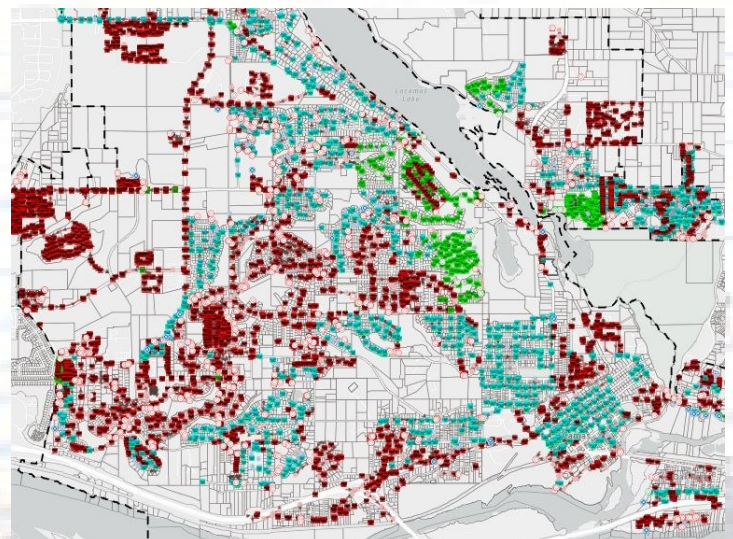
- Known MS4 outfalls and known MS4 discharge points, including outfall size and material where known.
- Receiving waters, other than groundwater.
- Public stormwater treatment and flow control BMPs/facilities.
- Geographic areas that do not discharge stormwater to the surface waters.
- Tributary conveyance to all known outfalls and discharge points with a 24 inch diameter or larger, or an equivalent cross-sectional area for non-pipe system (tributary conveyance type, material, size, associated drainage areas, land use).
- Connections between the MS4 owned or operated by the other municipalities or public entities.
- All connections to the MS4 authorized or allowed by the City after February 16, 2007.

b. New Mapping requirements:

- No later than March 31, 2026, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. Report size and material of outfalls, where known.
- No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Permittees shall develop and follow a methodology to intentionally identify canopy for stormwater management proposes,

which may be updated annually or as needed.

- No later than March 31, 2028, implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the permittee.
- Submit with the March 31, 2028, Annual Report a map(s) (.pdf) and table (.xlsx) with a breakdown of the MS4 tributary basins quantifying estimated acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.
- No later than December 31, 2028, using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.



- c. The required format for mapping is electronic (e.g. Geographic Information System (GIS), CAD drawings, or other software that can map and store points, lines, polygons, and associated attributes), with fully described mapping standards.
- d. Upon request, make maps available to Ecology.
- e. Upon request, and to the extent appropriate, provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees. The Permit does not preclude the City from recovering reasonable costs associated with fulfilling mapping information requests by federally recognized Indian Tribes, municipalities and other Permittees.

CURRENT ACTIVITIES (S5.C.4):

The City maintains the MS4 mapping by incorporating record drawing information from

new developments and correcting existing features as needed. All known MS4 outfalls (size and material) have been added to the MS4 mapping, update as needed. All known connections from the MS4 to privately owned stormwater system have been mapped. Staff are using GPS to add and adjust assets to correct locations. Desktop data entry using as-builts is being conducted to clean up the City's GIS layer. The City MS4 mapping is performed in ArcGIS.

PLANNED ACTIVITIES (S5.C.4):

The City will continue to update and maintain MS4 mapping within ArcGIS and associated applications.

The City will implement GIS capabilities on the television pipe line inspection vehicle for detailed pipe information and asset locations.

S5.C.5 Illicit Discharge and Elimination (IDDE)

Discharges from cities often include waste and wastewater from sources other than stormwater. Illicit discharges are those that enter the public storm system in two ways, (1) by direct connection of wastewater piping to storm lines; or (2) through indirect connections, such as infiltration from cracked wastewater piping, dumping of illicit material into storm drains, or accidental spills that result in wastewater flowing into storm drains.

PERMIT REQUIREMENTS (S5.C.5):

- a. The program shall include procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified. The program shall also include procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4.
 - Illicit connections and illicit discharges must be identified through, but not limited to: field screening, inspections, complaints/report, construction inspections, maintenance inspections, source control inspections, and/or monitoring information, as appropriate.
- b. Inform public employees, businesses, and the public of hazards associated with illicit discharges and improper disposal of waste.



c. Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the MS4 to the maximum extent allowable under state and federal law.

- The ordinance or other regulator mechanism in effect as of the effective date of this Permit shall be revised if necessary to meet the requirements of this Section no later than July 1, 2027.
- External washdown of buildings with potential PCB containing materials shall not discharge washdown water to the MS4.

d. Implement an ongoing program designed to detect and identify non-stormwater discharges and illicit discharges and illicit connections into the MS4.

- Implement a field screening methodology appropriate to the characteristics of the MS4 and water quality concerns. Complete field screening for an average of 12% of the MS4 each year.
- Provide a publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.
- Ongoing training program for all municipal field staff on identification of an illicit discharge and/or connection, and on proper procedures for reporting and responding to the illicit discharge and/or connection. Provide follow-up training as needed to address changes in procedures, techniques, requirements, or staffing. Document and maintain records of the trainings provided and the staff trained.

e. Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the MS4.

- Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the City. Procedures shall address the evaluation of whether the

discharge must be immediately contained and steps to be taken for containment of the discharge.



- Procedures for post-emergency clean-up following firefighting activities:
 - No later than December 31, 2026, the City shall coordinate with firefighting agencies/departments that serve the areas that discharge to the MS4 to be notified when PFAS-containing AFFFs are used during emergency firefighting activities.
 - No later than January 1, 2027, the City shall update and implement procedures to minimize discharges to the MS4 during post-emergency clean-up and disposal activities including, but not limited to, the immediate clean-up in all situations where PFAS-containing AFFFs have been used, diversions, and other measures that prevent discharges to the MS4. The City is not expected to deploy measures during an emergency.
- Procedures for tracing the source of an illicit discharge.
- Procedures for eliminating the discharge, including notification of appropriate authorities and property owners.

f. Ensure municipal staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections are trained to conduct these activities. Provide follow-up training as needed to address changes in procedures, techniques, requirements, or staffing. Document and maintain records of the training provided and the staff trained.

g. Recordkeeping: Track and maintain records of the activities conducted. In the Annual Report, submit data for the illicit discharges, spills and illicit connections including those that were found by, reported to, or investigated by the City during the previous calendar year.



CURRENT ACTIVITIES (\$5.C.5):

The City's Illicit Detection and Discharge Elimination Ordinance (CMC 14.04) incorporates the various aspects of the Permit requirements.

The ongoing IDDE program includes procedures for addressing illicit discharges, source tracing, and eliminating the discharge.

The IDDE program continues to educate the public on the harmfulness of improper disposal of waste. An educational IDDE flyer with the hotline number is available to the public at City Hall, the Operations Center, and at tabling events at the Camas Farmers Market. The same information is available on the City's website where the public can access all year round.

The City maintains a hotline and mobile application (CamasConnect 24/7) that allows citizens to report illicit discharges/connections. Calls/complaints are routed to the appropriate staff. All reports are investigated immediately upon submission.

Outfall inspections are the chosen method for field screening assessment. The City tracks the total percentage of outfalls screened annually since the issuance of the 2019-2024 Permit.

Field staff are trained when first hired and then annually. Records of staff training is documented.

All inspections, investigations, illicit discharges and spill-related activities are tracked in excel spreadsheets and Customer Relationship Management (CRM) Software.

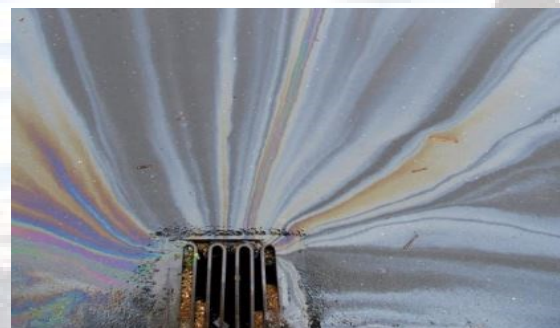
The City completed IDDE reporting data in accordance with the format provided in Appendix 12. The IDDE reporting data will be submitted with the Annual Report.

PLANNED ACTIVITIES (\$5.C.5):

The City will continue to implement the Current Activities.

The City no longer uses PFAS-containing AFFFs during firefighting activities.

The City will update procedures to minimize discharges to the MS4 during post-emergency clean up and disposal activities by January 1, 2027.



S5.C.6 Controlling Runoff from Development & Construction

The City will implement, and enforce a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. The program shall apply to private and public development, including transportation projects.

PERMIT REQUIREMENTS (S5.C.6):

- a. Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.
 - Adopt and make effective a local program, no later than June 30, 2027, that meets the requirements of Section S5.C.6.b(i) through (iii), below, and shall apply to applications submitted:
 - i. On or after July 1, 2027
 - ii. Prior to January 1, 2017, that have not started construction by January 1, 2022
 - iii. Prior to July 1, 2022, that have not started construction by July 1, 2027
 - iv. Prior to July 1, 2027, that have not started construction by July 1, 2032
- b. The ordinance shall include, at a minimum:
 - The Minimum Requirements, thresholds, and definitions in Appendix 1, or the 2019 Appendix 1 amended to include the changes identified in Appendix 10, or Phase I program approved by Ecology and amended to include Appendix 10, for new development, redevelopment, and construction sites. Adjustment and exceptions criteria equivalent to those in Appendix 1 shall be included. Such local requirements and thresholds shall provide equal protection of receiving waters and equal levels of pollutant control to those provided in Appendix 1.
- The local requirements shall include the following requirements, limitations, and criteria that, when used to implement the minimum requirements in Appendix 1 will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy the State requirements under chapter 90.48 RCW to apply AKART prior to discharge:
 - i. Site planning requirements
 - ii. BMP selection criteria
 - iii. BMP design criteria
 - iv. BMP infeasibility criteria
 - v. LID competing needs criteria
 - vi. BMP limitations
- The legal authority, through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities that discharge to the MS4.
- c. The program shall include a permitting process with plan review, inspection and enforcement capability to meet the standards listed below, for both private and public projects, using qualified personnel. At a minimum, the program shall be applied to all sites that that meet the minimum thresholds adopted pursuant to S5.C.6.b.i.
 - Review all stormwater site plans for proposed development activities.
 - Inspect, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport.
 - Inspect all permitted development sites during construction to verify proper installation and maintenance of required

erosion and sediment controls. Enforce as necessary based on the inspection.

- Inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential developments at least twice per 12-month period with no less than 4 months inspections, until 90% of the lots are constructed (or when construction has stopped and the site is fully stabilized), to identify maintenance needs and enforce compliance with maintenance standards as needed.
 - Inspect all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities. Enforce as necessary based on the inspection.
 - Compliance by achieving at least 80% of scheduled inspections.
 - Include a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.
 - An enforcement strategy shall be developed and implemented to respond to issues of non-compliance.
- d. Make available the link to the electronic Construction Stormwater General Permit Notice of Intent (NOI) form and Industrial Stormwater General Permit NOI form. Continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.
- e. Ensure that municipal staff whose primary job duties are implementing the program to control

stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training must be provided as needed to address changes in procedures and techniques or staffing. Document and maintain records of the training provided and the staff trained.

CURRENT ACTIVITIES (S5.C.6):

The City has an ongoing program for the permit process with plan review, inspections and enforcement capabilities. All inspections are documented.

The City's Stormwater Control Ordinance (CMC 14.02) was adopted on February 1, 2010 and revised November 21, 2016, and incorporates the various Permit requirements.

The City adopted (CMC 14.02.050) the latest Stormwater Management Manual for Western Washington (SWMMWW) to help control runoff from developments and construction sites. The requirements, limitations, and criteria of the SWMMWW will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy State AKART.

All applicable field staff are trained in erosion control inspection and have a Certified Erosion and Sediment Control Lead (CESCL) certification.





The City continues to refine the tracking mechanism for inspections and enforcements, development inspection procedures and site plan review standards.

PLANNED ACTIVITIES (S5.C.6):

The City will continue to implement the Current Activities.

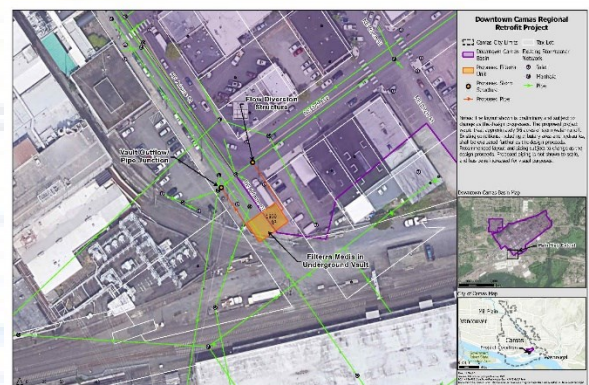
S5.C.7 Stormwater Management for Existing Development

The City will implement a Program to control or reduce stormwater discharges to waters of the State from areas of existing development. The Program shall aim to focus on strategic stormwater investments over longer planning timeframes.

PERMIT REQUIREMENTS (S5.C.7):

- a. Implement stormwater facility retrofits, or tailored SWMP actions that meet the criteria described in Appendix 12, using one or a combination of the following:
 - i. Strategic stormwater investments identified in Stormwater Management Action Plan(s) (SMAP) or similar stormwater planning process and/or
 - ii. Opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management infrastructure
- b. With each Annual Report, the City shall provide a list of planned individual projects scheduled for funding or implementation during this Permit term for the purpose of meeting the assigned equivalent acreage in Appendix 12. Equivalent acreage for the City of Camas is 4.4 acres.

- c. No later than March 31, 2028, Permittees shall fully fund, start construction, or completely implement project(s) that meet the assigned equivalent acreage and submit documentation with the Annual Report, due March 31, 2028.
- d. Permittees may collaborate to meet regional goals.
- e. The City shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term (2029-2032) by March 31, 2028.



CURRENT ACTIVITIES (S5.C.7):

The City has been awarded two Water Quality Combined Financial Assistance Grants from the Department of Ecology. The grants fund the City of Camas Crown Park Regional Stormwater Retrofit

Project and the City of Camas Downtown Regional Stormwater Retrofit Project. The grant is to help fund planning and design of the two projects. The projects will capture, treat and provide flow control for over 200 acres of minimally treated stormwater.

Due to timing of grant applications and the current timeline for the planning and design phase of the identified SMAP projects, it is undetermined if the grant funded projects identified in the SMAP

process will count towards this current permit terms equivalent acres.

The City is working on prioritizing rehabilitation and retrofit projects on public stormwater facilities.

PLANNED ACTIVITIES (S5.C.7):

The City will look for opportunities to meet the assigned equivalent acreage requirements.

S5.C.8 Source Control Program for Existing Development

The City shall implement a program to prevent and reduce pollutants in runoff from areas of existing development that discharge to the MS4. The program shall include application of source control BMPs, inspections, and enforcement.

PERMIT REQUIREMENTS (S5.C.8):

- a) Enforce ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.
 - The City shall update and make effective the ordinance(s), or other enforceable documents, as necessary to meet the requirements of S5.C.8 by August 1, 2027.
- b) Implement a program to identify publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. Permittees shall update the inventory at least once every 5 years. The inventory shall include:
 - i. Businesses and/or sites identified based on the presence of activities that are pollutant generating and;

- ii. Other pollutant generating sources, based on complaint response, such as: home-based businesses and multifamily sites.
- c) Implement an inspection program, performed by qualified personnel, for sites identified in the inventory.
 - i. All identified sites with a business address shall be provided information about activities that may generate pollutants and the source control requirements applicable to those activities. This information shall be provided by mail, telephone, electronic communications, or in person. This information may be provided all at one time or spread out over the permit term to allow for tailoring and distribution of the information during site inspections.
 - ii. Annually complete the number of inspections equal to 20% of the businesses and/or site listed in their source control inventory to assess BMP effectiveness and compliance with source control.
 - iii. Inspect 100% of sites identified through credible complaints.

- d) Implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period.
- e) Ensure municipal staff who are responsible for implementing the source control program are trained to conduct these activities. The ongoing training program shall cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Provide follow-up training as needed to address changes in procedures, techniques, requirements, or staff. Document and maintain records of the training provided and the staff trained.

CURRENT ACTIVITIES (S5.C.8):

The City has created a Business Inventory List of publicly and privately owned institutional, commercial, and industrial sites in accordance with Appendix 8 of the Permit. The City has adopted a Water Resources Protection ordinance CMC14.04.

The City has entered an Interlocal Agreement with Clark County Public Health, Ecology, and

Washougal to fund a full-time employee to assist with City source control inspections. Postcards explaining the Source Control Program and a link to the Source Control webpage on City’s website were sent to all businesses on the Business Inventory List in 2023.

PLANNED ACTIVITIES (S5.C.8):

The City has implemented a business inspection program. City staff will follow up on all public requests for source control issues as well as any follow up issues during initial source control inspections.

Source Control inventory was updated in February 2025. New outreach materials will be produced for businesses and/or sites for specific types of job functions.

Review City ordinances and other enforceable documents by August 1, 2027.

Staff will continue to participate in trainings.

S5.C.9 Operations & Maintenance

The City developed and implemented an Operations and Maintenance (O&M) program to regulate and conduct maintenance activities to prevent or reduce stormwater impacts.

PERMIT REQUIREMENTS (S5.C.9):

- a) Implement maintenance standards that are as protective, or more protective, of facility function than those specified in the SWMMWW. Maintenance standards shall be developed for facilities that do not have maintenance standards. No later than June 30,

2027, maintenance standards shall be updated to meet Permit requirements.

- i. Unless there are circumstances beyond the City’s control, when an inspection identifies an exceedance of the maintenance standards, maintenance shall be performed:
 - Within 1 year for typical maintenance of facilities, except catch basins.
 - Within 6 months for catch basins.
 - Within 2 years for maintenance that requires capital construction of less than \$25,000.

- ii. For each exceedance of the required timeframe, the Permittee shall document the circumstances and how they were beyond their control.
- b) Implement a stormwater facility maintenance program for facilities regulated by the City.
 - i. The program should include provisions to verify adequate long-term O&M of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to S5.C.6.c and shall be maintained in accordance with S5.C.9.a.
 - Implementation of an ordinance or other enforceable mechanism that clearly identifies the party responsible for maintenance, requires inspection of facilities, and establishes enforcement procedures.
 - Annual inspections of all private stormwater treatment and flow control BMPs/facilities that discharges to the MS4 and were permitted by the City, including those permitted in accordance with requirements adopted pursuant to the 2007-2019 Permits.
 - ii. Compliance with the inspection requirements by achieving at least 80% of required inspections.
 - iii. The program shall include a procedure for keeping records, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.
- c) Implement a stormwater facility maintenance program for facilities owned or operated by the City.
 - i. Annual inspection of all municipally owned or operated stormwater treatment and flow control BMPs/facilities and taking appropriate maintenance actions.
 - ii. Spot check potentially damaged stormwater treatment and flow control BMPs/facilities after major storm events. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards.
- iii. Inspect all catch basins and inlets owned or operated by the City every two years. Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the SWMMWW.
- iv. Compliance by achieving 95% of required inspections.
- d) No later than December 31, 2027, implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and road maintenance activities under the functional control of the City. Lands owned or maintained by the City include, but are not limited to: streets, parking lots, roads, highways, buildings, parks, open spaces, road rights-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities.



Program shall address the following activities:

- Pipe cleaning
- Cleaning of culverts that convey stormwater in ditch systems
- Ditch maintenance
- Street cleaning
- Road repair and resurfacing, including pavement grinding
- Snow and ice control

- Utility installation
 - Pavement striping maintenance
 - Maintaining roadside areas, including vegetation management
 - Dust control
 - Application of fertilizers, pesticides, and herbicides
 - Sediment and erosion control
 - Landscape maintenance and vegetation disposal
 - Trash and pet waste management
 - Building exterior cleaning and maintenance
 - For City owned buildings built or renovated between 1950-1980, update policies, practices, or procedures to include Source Control BMPs to minimize PCBs from entering the MS4. The City shall not discharge washdown water to the MS4 if the building is confirmed or suspected to have PCB-containing materials.
 - Preparing City owned buildings for renovation or demolition
 - Update policies, practices, or procedures to include Source Control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.
- e) No later than July 1, 2027, develop and implement a municipal street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters. The following program elements shall be included:
- Priority areas: curbed municipal streets that discharge to outfalls and meet either/both of high traffic streets, such as arterials or collectors and/or streets that serve commercial or industrial land use areas.
- Program timing: sweep priority areas at least once between July and September of each year and at least two additional times a year.
 - Compliance is sweeping at least 90% of priority areas each sweeping event.
 - Operational Procedures: follow equipment design and performance specifications.
 - Street waste disposal: dispose of sweeper waste in accordance with Appendix 6 – Street Waste Disposal.
 - Reporting: no later than March 31, 2028 submit with the annual report:
 - Priority areas swept identified on a map
 - Sweeping dates
 - Sweeping frequency
 - Type of sweeper
 - Total curb miles of priority areas and curb miles swept
 - Approximation of debris removed
- f) Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities. SWPPPs shall include the following information at a minimum:
- A detailed description of the operational and structural BMPs in use at the facility and a schedule for implementation of additional BMPs when needed.
 - At a minimum, annual inspections of the facility, including visual observations of discharges, to evaluate the effectiveness of the BMPs, identify maintenance needs, and determine if additional or different BMPs are needed.
 - Inventory of materials and equipment stored on-site.

- A site map showing facility stormwater drainage, discharge points, and areas of potential pollutant exposure.
- A plan for preventing and responding to spills at the facility which would result in an illicit discharge.

- g) Implement an on-going training program for staff whose primary construction, operations, or maintenance job functions may impact stormwater quality. The training program should address the importance of protecting water quality, operation and maintenance standards, inspection procedures, relevant SWPPPs, selecting appropriate BMPs, street sweeper operation, ways to perform their job activities to prevent or minimize impacts to water quality and procedures for reporting water quality concerns. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Document and maintain records of training provided and staff trained.
- h) Maintain records of activities conducted by the City to meet the requirements of this section.

CURRENT ACTIVITIES (S5.C.7):

The Operations storm maintenance crew has an ongoing program to inspect and clean catch basins, and to inspect and maintain public stormwater facilities. Street sweeping is done on a regular basis. There is a list of 'Hot Spots' that are checked after all major storm events.

The City has an ongoing program to inspect private stormwater facilities and coordinate with private owners for maintenance.

The City has an ongoing training program for employees, who encounter stormwater on a regular basis, to learn the importance of protecting water quality.

A SWPPP was developed for the City Operations Center to comply with permit requirements. This is a dynamic document; contents are updated as needed. The SWPPP was updated in December 2022.

The City updated the maintenance standards in June 2022.

The City has partnered with other local jurisdictions to support a Catch Basin Cleaning Assistance Program which allows private owners to pay only \$50 per catch basin cleaning. The program is presented to HOA's and businesses during stormwater facility inspections, Camas Farmers Market and Source Control Inspections.



PLANNED ACTIVITIES (S5.C.7):

The City will continue to implement current activities.

The City will continue to implement ESRI applications for more efficient and streamlined field operations and inspections.

The City will update policies, practices and procedures to include source control BMPs for building materials to prevent PCBs from entering the MS4.

The city will adjust and improve the street sweeping program to meet the requirements of S5.C.9 no later than July 1, 2027.

The City will review and update, if necessary, any maintenance standards identified in the SWMMWW no later than June 30, 2027.

S8 Monitoring & Assessment

During the 2019-2024 Permit term, the City chose S8.A.2 Regional Status and Trends Monitoring Option in which the City made a one-time payment into the Stormwater Action Monitoring (SAM) collective fund to implement regional small streams and marine nearshore areas status and trends monitoring in urban streams in the Lower Columbia River basin.

The City chose to continue this commitment during the current Permit term. The annual payments into the collective fund are due on or before August 15 each year beginning in 2025.

During the 2019-2024 Permit term, the City chose S8.B Effectiveness Studies Option in which the City

made a one-time payment into the collective fund for Stormwater Action Monitoring (SAM) to implement effectiveness studies and source identification studies.

The City chose to continue this commitment during the current Permit term. The annual payments into the collective fund are due on or before August 15 each year beginning in 2025.

The City's 2024 contribution for Regional Status and Trends Monitoring was \$5,636 and for Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies was \$6,977.

S9 Reporting Requirements

- a) An annual report is required to be submitted no later than March 31st of each year of the Permit, beginning in 2025. The report covers the reporting period from January 1st through December 31st unless otherwise specified. Annual Reports shall be submitted electronically using Ecology's Water Quality Permitting Portal (WQWebPortal) available on Ecology's website.
- b) The City is required to keep all records related to the Permit and the SWMP for at least five (5) years.
- c) All records related to this permit and the City's SWMP shall be available to the public at reasonable times during business hours. A copy of the most recent annual report will be

provided to any individual or entity, upon request.

- A reasonable charge may be assessed for making photocopies of records.
 - City may require reasonable advance notice of intent to review records related to this permit.
- d) The annual report shall include the following:
 - The current Stormwater Management Plan (SWMP);
 - Submittal of the annual report form as provided by Ecology pursuant to S9.A, describing the status of implementation of the requirements of this permit during the reporting period.

- Attachments to the annual report form including summaries, descriptions, reports, and other information as required, or as applicable, to the requirements of this permit during the reporting period.
 - If applicable, notice that MS4 is relying on another entity to satisfy any of the obligations under this permit.
 - Certification and signature pursuant to G19.D, and notification of any changes to authorization pursuant to G19.C.
 - A notification of any annexations, incorporations or jurisdictional boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period.
- e) No later than March 31st of each year, the new annual report and the updated SWMP will be available to the public on the City's webpage at <https://www.cityofcamas.us/publicworks/page/npdes-permit>