

I. Permittee Information	
Permittee Name Clark County, Washington	Permittee Coverage Number WAR04-4001
Contact Name Rod Swanson	Phone Number (360) 397-6118, ext. 4581
Mailing Address PO Box 98910	
City Vancouver	State Zip + 4 WA 98666-9810
Email Address rod.swanson@clark.wa.gov	

II. Regulated Medium or Large MS4 Location		
Jurisdiction Clark County	Entity Type: Check the box that applies	
	County	City/Town
	X	
Major Receiving Water(s) WRIA 27, WRIA 28		

III. Relying on another Governmental Entity	
<p>If you are relying on another governmental entity to satisfy one or more of the permit obligations, list the entity and briefly describe the permit obligation(s) they are implementing on your behalf below. <i>Attach a copy of your agreement with the other entity to provide additional detail.</i></p>	
Name of Entity:	Permit Obligation(s):

REMINDER: Save this Excel worksheet under a new name. Did you remember to include your permit coverage number? This can be found on the Subject line of the coverage letter Ecology sent you. Proceed to the **Certification** tab.

IV. Certification

All annual reports must be signed and certified by the responsible official(s) of permittee or co-permittees. Please print and sign this page of the reporting form and mail it (with an original signature) to Ecology at the address noted below. An electronic signature will not suffice.

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.

Name <u><i>B. J. J.</i></u>	Title <u><i>Environmental Services Director</i></u>	Date <u><i>3-30-10</i></u>
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____

V. Submittal-- Submit by March 31

If using this Excel version of the annual report form, email one electronic copy, including all identified attachments, to ***PH1_AnnRpt@ecy.wa.gov*** AND submit two printed, signed copies of the entire annual report PLUS attachments to:

Department of Ecology
Water Quality Program
Municipal Stormwater Permits
P.O. Box 47696
Olympia, WA 98504-7696

REMINDER: Proceed to the **ANNUAL REPORT (Section VI)** tab next.

VI. Status Report Covering Calendar Yr: 2009 _____

Jurisdiction Name: Clark County _____

PLEASE label any information in attachments with corresponding question numbers.

NOTE: Items that have future compliance dates must still be answered to indicate status.

PLEASE indicate reporting year and your jurisdiction in Line 1, above.

PLEASE refer to the INSTRUCTIONS tab for assistance filling out this table.

PLEASE review your work for completeness and accuracy. Save this worksheet as you go!

	Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
1	Attached a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period, and implications for the SWMP as per S9.E.8.	Y		During 2008, 248 acres, including 0.7 miles of county right-of-way, were annexed into cities. Battle Ground (62 acres), Ridgefield (7 acres), and Vancouver (178 acres) made relatively small annexations. The Vancouver annexation included an industrial facility in the Port of Vancouver.	See Attachment C.
S4. Compliance with Standards					
2	Attached (as part of the Program Evaluation and Other Activities narrative in Section VII.B) a summary of the status of implementation of any actions taken pursuant to S4.F and the status of any monitoring, assessments or evaluation efforts conducted during the reporting period (S4.F.3.d)	NA		No actions were implemented pursuant to S4.F.	
S5 Stormwater Management Program					
S5.C.1 Legal Authority					
3	Operated pursuant to legal authority as required under S5.C.1.	Y			
S5.C.2 MS4 Mapping and Documentation					
4	The location of all known municipal separate storm sewer outfalls, receiving waters and structural stormwater BMPs you own, operate, or maintain are mapped. (Required by February 15, 2009, S5.C.2.b.i)	Y		Clark County has maintained maps of its facilities since the 1990's. A project to upgrade and complete all conveyance and facility mapping was completed in January 2010. Receiving waters are mapped as hydrology layers as part of basic county GIS data.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
5	A program is in place to map the location of all known connection points between municipal separate storm sewers you own or operate and other municipalities or other public entities. (Required by February 15, 2009, S5.C.2.b.i)	Y			
6	<u>Cities:</u> All storm sewer outfalls with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems, and including tributary conveyances (type, material and size where known), associated drainage areas and land use throughout the city, are mapped. (Required by February 15, 2011, S5.C.2.b.ii) <u>Counties:</u> All storm sewer outfalls with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems, and including tributary conveyances (type, material and size where known), associated drainage areas and land use in urban/higher density rural sub-basins, are mapped. (Required by February 15, 2011, S5.C.2.b.ii)	NA		Requirement not yet due. However, conveyance mapping, including ditches is largely completed for the entire county.	
7	A program is in place to maintain a map of all connections to the MS4 that have been authorized or allowed after the effective date of the permit. (S5.C.2.b.iii)	Y		Connections were mapped on construction plans but not added to GIS database during 2009. Connections will be added to the GIS database during 2010.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
<p>8 <u>Cities:</u> All existing, known connections over 8 inches to municipal separate storm sewers tributary to all storm sewer outfalls with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems, are mapped. (<i>Required</i> by February 15, 2009, S5.C.2.b.iv)</p> <p><u>Counties:</u> All existing, known connections over 8 inches to municipal separate storm sewers tributary to all storm sewer outfalls with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems, located in one-half the area of the County within urban/higher density rural sub-basins are mapped. (Required by February 15, 2011, S5.C.2.b.iv)</p>	NA		Requirement not yet due. Clark County has, however, mapped its drainage system and known pipe and ditch connections within the urban growth area.	
<p>9 Geographic areas served by the MS4 that do not discharge stormwater to surface waters are mapped. (<i>Required</i> by February 15, 2011, S5.C.2.b.v)</p>	NA		Requirement not yet due.	
<p>10 Municipal storm sewer system GIS data layers that you have updated are listed in <i>Comments</i> field. (S5.C.2.b.vi)</p>	Y		All storm sewer system GIS layers were updated. This includes treatment and flow control facilities, connection points, catch basins, manholes, pipes, ditches, drywells, infiltration trenches, and outfalls.	
<p>11 Mapping information has been made available to Ecology, Co-Permittees and Secondary Permittees upon request to the extent appropriate. (S5.C.2.b.vi and vii)</p>	Y		Data is available from the GIS Department and via the county interactive web mapping tool at: http://gis.clark.wa.gov/imfmol/imf.jsp?site=MapsOnline	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
S5.C.3 Coordination					
12	Established and are implementing written internal coordination agreement(s) or directives to facilitate compliance with the permit. <i>(Required by February 15, 2008, S5.C.3.b.i)</i>	Y		Established MOUs with Road Operations for S5.C.9 and Community Development for parts of S5.C.5. Coordination directive issued by the County Administrator to department directors in 2008.	
13	Established coordination mechanisms clarifying roles and responsibilities for control of pollutants between any other municipal stormwater Permittee's physically interconnected municipal storm sewers. <i>(Required by February 15, 2009 or within 2 years following the addition of a new Secondary Permittee, S5.C.3.b.ii)</i>	Y		County and city staff have informal discussions regarding results of illicit discharge screening results and potential pollutant sources. Clark County will work to further refine and document coordination mechanisms in 2010. Clark County has mapped known connections to other municipal systems.	
14	Established coordination activities for shared waterbodies among Permittees including Secondary Permittees. <i>(Required by February 15, 2009, S5.C.3.b.ii)</i>	Y		Shared waterbodies are limited in Clark County. Interjurisdictional coordination includes the ESA recovery plan, and the Vancouver Lake Watershed Partnership.	
S5.C.4 Public Involvement and Participation Program					
15	Implemented a process to create opportunities for the public to participate in processes for development, implementation and updates of the SWMP, including consideration of public comments on the SWMP. <i>(Required by August 15, 2007, S5.C.4.b.i)</i>	Y		Held monthly Clean Water Commission meetings to review stormwater program activities as an advisor of the Board of Clark County Commissioners on program development and implementation. Implemented public involvement for stormwater code revisions adopted in 2009.	
16	Made the SWMP and all submittals required by the permit available to the public on the Permittee's website listed below, or provided all submittals to Ecology in electronic format for posting on Ecology's website. <i>(Required by March 31, 2008, S5.C.4.b.ii)</i> List Permittee's website address in <i>Comments</i> field.	Y		http://www.clark.wa.gov/water-resources/SWMP/stormwater_plan.html	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
	S5.C.5 Controlling Runoff from New Development, Redevelopment and Construction Sites				
17	Submitted draft enforceable requirements, technical standards and manual, that address requirements to prevent and control runoff from new development, redevelopment and construction site activities in S5.C.5.b.i through S5.C.5.b.iii, to Ecology for review and approval on the date provided in <i>Comments</i> field. (Required by February 15, 2008, S5.C.5.b.iv)	NA		Draft code and manual revisions were submitted in July 2008.	
18	Adopted the final enforceable requirements, technical standards and manual to prevent and control runoff from new development, redevelopment and construction site activities on the date provided in <i>Comments</i> field. (Required by August 15, 2008, or 60 days following Ecology's written response)	N		Code revisions were adopted on January 13, 2009. Three code revisions requested by Ecology were made on December 2, 2009. An agreed order resolving a permit violation regarding flow control mitigation under minimum requirement 7 of appendix 1 was signed by Clark County in December 2009 and by Ecology in January 2010.	
19	Were exceptions or variances to the minimum requirements in Appendix 1 granted? (Required by August 15, 2008, S5.C.5.b.ii, and Section 6 of Appendix 1)	N		No development projects were granted variances from the minimum requirements of either manual during 2009. Building Safety does not grant stormwater variances.	
19a	Number of variances granted:		0		
20	To the extent allowable under state and federal law, established legal authority to inspect private stormwater facilities and enforce maintenance standards for all new development and redevelopment approved under the provisions of S5.C.5.b. (Required by August 15, 2008, S5.C.5.b.v)	Y		Maintenance standards have been in place since before the first NPDES permit. Implemented maintenance standards equivalent to 2005 SWMMWW after April 13, 2009.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
21	Developed and implemented a process of permits, plan review, inspections, and enforcement capability to meet the requirements of S5.C.5.b.vi, including maintenance plans for permanent stormwater facilities/BMPs, recordkeeping and an enforcement strategy. (Required to begin by August 15, 2008, S5.C.5.b.vi)	Y		Before April 13, 2009, a process was in place for standards of the 1999 permit. Beginning on April 13, 2009, this process was shifted to apply to the code revisions required by the 2007 permit.	
22	Reviewed stormwater site plans submitted for proposed development involving land disturbing activities that meet the thresholds in S5.C.5.b.i. (Required beginning August 15, 2008, S5.C.5.b.vi)	Y		Before April 13, 2009, a process was in place for standards of the 1999 permit. Beginning on April 13, 2009, this process was shifted to apply to the code revisions required by the 2007 permit.	
22a	Number of site plans submitted:		1,317	For building permits, all individual lots must submit a lot plan. In subdivisions all lots have stormwater design specifications, which Building staff evaluate compared to the construction proposed and site conditions.	
22a	Number of site plans submitted:		41	Final engineering plans for development projects such as subdivisions.	
22b	Number of site plans reviewed:		1,317	Building Safety reviews building projects submitted to the Building Safety Department.	
22b	Number of site plans reviewed:		41	Final engineering plans for development projects such as subdivisions. One project was under the 2007 permit minimum requirements.	
23	Inspected, prior to clearing and construction, permitted development sites that meet the thresholds in S5.C.5.b.i and that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 <i>Identifying Construction Site Sediment Transport Potential</i> . (Required to begin by August 15, 2008, S5.C.5.b.vi)	Y		The number is not determined because building projects have a preconstruction inspection as part of the setback inspection of the site plan. All development projects such as subdivisions also have a preconstruction site visit during the design phase.	
23a	Number of sites determined to have high sediment transport potential:		NA	See responses from # 23	
23b	Number of sites inspected:		1,317	Building projects	
23b	Number of sites inspected:		41	Development projects	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
24	Inspected construction-phase stormwater controls at permitted development sites that meet the thresholds in S5.C.5.b.i during construction to verify proper installation and maintenance of required erosion and sediment controls. (<i>Required</i> to begin by August 15, 2008, S5.C.5.b.vi)	Y		The standards under the 1999 permit were applied to projects vested before April 13, 2009. For projects vested after April 12, 2009, inspections were for standards adopted to meet 2007 permit requirements.	
24a	Number of qualifying permitted development sites:		1,317	Building projects	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
24a	Number of qualifying permitted development sites:		121	Development projects	
24b	Number of sites inspected:		1,317	Building projects	
24b	Number of sites inspected:		121	Development projects	
25	Enforced as necessary based on the construction-phase inspection at new development and redevelopment projects. <i>(Required to begin by August 15, 2008, S5.C.5.b.vi)</i> List nature of enforcement actions in <i>Comments</i> field.	Y		The standards under the 1999 permit were applied to projects vested before April 13, 2009. For projects vested after April 12, 2009, inspections were for standards adopted to meet 2007 permit requirements. Building enforcement actions were correction notices and stop work orders.	
25a	Number of enforcement actions taken:		1,188	Building Safety	
25a	Number of enforcement actions taken:		83	Code Enforcement Program	
25a	Number of enforcement actions taken:		0	Construction Management Development Inspection	
26	Inspected permitted development sites that meet the thresholds in S5.C.5.b.i upon completion of construction and prior to final approval or occupancy to verify proper installation of permanent erosion controls and stormwater facilities / BMPs. <i>(Required to begin by August 15, 2008, S5.C.5.b.vi)</i>	Y		The standards under the 1999 permit were applied to projects vested before April 13, 2009. For projects vested after April 12, 2009, inspections were for standards adopted to meet 2007 permit requirements.	
26a	Number of qualifying permitted development sites that completed construction:		121		
26b	Number of sites inspected:		121		
27	Verified that a maintenance plan for sites that meet the thresholds in S5.C.5.b.i is completed and responsibility for maintenance is assigned. <i>(Required to begin by August 15, 2008, S5.C.5.b.vi)</i>	Y		The standards of the 1999 permit were applied to projects vested before April 13, 2009. Standards required by the 2007 permit applied from that date forward.	
28	Enforced as necessary based on the post-construction inspection. <i>(Required to begin by August 15, 2008, S5.C.5.b.vi)</i> List the nature of enforcement actions in the <i>Comments</i> field.	Y		Enforced 1999 permit requirements for projects vested before April 13, 2009. Standards required by the 2007 and 2009 permit applied from that date forward. Code Enforcement Program actions included 4 letters and a notice and order.	
28a	Number of enforcement actions taken:		5	Code Enforcement Program	
28a	Number of enforcement actions taken:		0	Development Inspection Program	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
29	Developed and implemented an enforcement strategy to respond to issues of non-compliance. (<i>Required</i> to begin by August 15, 2008, S5.C.5.b.vi)	Y		An enforcement strategy was in place to meet 1999 permit requirements. This approach continued under the 2007 permit requirements.	
30	Developed and implemented a recordkeeping process for inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, other enforcement records, maintenance inspections and maintenance activities. (<i>Required</i> by August 15, 2008, S5.C.5.b.vi)	Y		A record-keeping process was in place to meet 1999 permit requirements. This approach continued under the 2007 permit requirements.	
31	Made Ecology's <i>Notice of Intent for Construction Activity</i> and <i>Notice of Intent for Industrial Activity</i> available to representatives of proposed new development and redevelopment. (S5.C.5.b.vii)	Y			
32	All 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. (<i>Required</i> by August 15, 2008, S5.C.5.b.viii)	Y			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
S5.C.6 Structural Stormwater Controls				
33	Y			
34	Y			See page 62 of Attachment A.
35	Y			

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
	S5.C.7 Source Control Program for Existing Development				
36	Submitted draft enforceable document(s), such as an ordinance, and proposed Source Control Program, which address requirements in S5.C.7.a and S5.C.7.b, to Ecology for review and approval on the date listed in the <i>Comments</i> field. (Required February 15, 2008, S5.C.7.b.i)	NA		Submitted the draft program in 2008.	
37	Adopted the enforceable document(s), such as an ordinance, on the date listed in the <i>Comments</i> field. (Required August 15, 2008, S5.C.7.b.i)	Y		Enforcement tools adopted under 1999 permit were continued in use between January 1, 2009 and April 12, 2009. After April 12, 2009, the standards adopted in January 2009 became effective.	
37a	Began enforcing Source Control Program on the date listed in the <i>Comments</i> field. (Required August 15, 2008, S5.C.7.b.i)	Y		Clark County has enforced standards adopted under 1999 permit since July 2000. Updated source control standards equivalent to the 2007 permit become effective April 15, 2009.	
38	Established an inventory or listing of land uses/businesses using the categories in Appendix 8 to identify sites that are potentially pollution generating. (Required August 15, 2008, S5.C.7.b.ii)	Y			
39	Periodically updated the inventory or listing of land uses/businesses using the categories in Appendix 8, as required in S5.C.7.b.ii.	Y		Site information updates are ongoing based on field inspection records and updates to Assessor's GIS data.	
40	Implemented a program to respond to complaints and to identify other pollutant generating sources, such as mobile or home-based businesses. (Required August 15, 2008, S5.C.7.b.ii)	Y		Complaint response system in place as part of program since 2000. A site visit is made in response to each complaint.	
41	Began implementing an audit/inspection program for sites identified pursuant to S5.C.7.b.ii. (Required February 15, 2009, S5.C.7.b.iii)	Y		Continued to provide information during door-to-door site visits and inspections.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
41a	Number of sites that were provided with information about activities that may generate pollutants and associated source control requirements:		554	Information provided by site visits as inspections.	
42	During the reporting period, inspected 20% of identified sites in the audit/inspection program established in S5.C.7.b.ii. (<i>Required</i> to begin by February 15, 2009, report beginning with the third year Annual Report for 2009, S5.C.7.b.iii)	Y		Clark County completes inspection sweeps by subwatershed. Because no business inventory exists for unincorporated areas, stormwater fee data are used to identify non-residential tax lots with impervious area. During 2009, 554 businesses were visited. After 2008 and 2009, approximately 1/2 of the businesses on non-residential tax lots in the unincorporated Vancouver UGA were visited. Clark County expects to complete an inspection of each non-residential stormwater fee taxlot by the end of the permit term.	
43	During the reporting period, inspected 100% of sites identified through legitimate complaints. (<i>Required</i> to begin by February 15, 2009, report beginning with the third year Annual Report for 2009, S5.C.7.b.iii)	Y			
43a	Number of sites identified through legitimate complaints:		53	17 received by Code Enforcement, 36 by Public Works.	
43b	Number of sites inspected:		53	17 inspected by Code Enforcement, 36 by Public Works.	
44	Began implementing a progressive enforcement policy to require sites to come into compliance with stormwater requirements. (Required beginning February 15, 2009, S5.C.7.b.iv) List nature of enforcement actions in <i>Comments</i> field. (S9.E.2.d)	Y		Progressive enforcement has been part of the program since it began in 2000. Code Enforcement issued one letter and provided education to one site.	
44a	Number of follow-up actions taken:		36	2 by Code Enforcement, 34 by Public Works.	
44b	Number of further enforcement actions taken:		16	All by Public Works.	
45	Contacted Ecology immediately upon discovering a source control violation that presented a severe threat to human health or the environment. (S5.C.7.b.iv and/or G3.)	NA			
45a	Number of violations reported to Ecology:		0		

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
46	Referred to Ecology non-emergency violation(s) of local ordinances after making a documented effort of progressive enforcement to bring them into compliance. (S5.C.7.b.iv)	Y			
46a	Number of referrals to Ecology:		8	0 by Code Enforcement, 8 by Public Works.	
47	All staff whose primary duties are implementing the Source Control Program are trained to conduct these activities in accordance with S5.C.7.b.v. (Required February 15, 2009, S5.C.7.b.v)	Y		One Development Inspector was borrowed from the development inspection program. This inspector was trained in source control manual implementation by the source control specialist.	
S5.C.8 Illicit Connections and Illicit Discharge Detection and Elimination (IDDE) Program					
48	The SWMP includes an ongoing program to detect and remove illicit connections and illicit discharges into the MS4 owned or operated by the Permittee, including the provisions in S5.C.8.a and S5.C.8.b.i through S5.C.8.b.ii. (S5.C.8.b.i)	Y			
49	Procedures have been developed for addressing pollutants entering the MS4 from an interconnected, adjoining MS4. (Required by February 15, 2009, S5.C.8.b.i)	Y		Very few points exist where other municipal systems drain to Clark County's MS4. Interconnection points were largely mapped during 2009. Screening program includes procedures to inspect connection points.	
50	Evaluated and, if necessary updated, existing ordinances or other regulatory mechanisms to effectively prohibit non-stormwater, illicit discharges, and/or dumping into the MS4. (Required by August 15, 2008, S5.C.8.b.ii)	Y		This requirement lead to minor code revisions that were completed in January 2009 and became effective April 13, 2009.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
51	All municipal field staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections are trained to conduct these activities. (<i>Required by August 15, 2008, S5.C.8.b.iii</i>)	Y			
52	All municipal field staff which, as part of their normal job responsibilities might come in contact with or otherwise observe illicit connections or discharges are trained to identify illicit connections and discharges and the proper procedures for reporting and response. (<i>Required by February 15, 2009, S5.C.8.b.iv</i>)	Y		Routine visits to Public Works Department Road Maintenance crew meetings provides awareness training.	
53	Provided a publicly-listed hotline or other local telephone number for water quality citizen complaints/reports. (For all except Clark County, <i>required</i> by February 15, 2007; for Clark County <i>required</i> by August 15, 2007, S5.C.8.b.v)	Y			
54	<u>Cities:</u> Conveyances and outfalls within the incorporated area are prioritized for field screening and source tracing as part of the ongoing program to detect and remove illicit connections and illicit discharges. <u>Counties:</u> Conveyances and outfalls in the urban/higher density rural sub-basins are prioritized, and one rural sub-basin has been selected, for field screening and source tracing as part of the ongoing program to detect and remove illicit connections and illicit discharges. (In preparation for the 2012 deadline, S5.C.8.b.vi)	Y		Screening scheduled by sub-watershed as part of the 4-year Stormwater Needs Assessment Program.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
55	<p><u>Cities</u>: Completed field screening of 60% of the conveyance systems within the incorporated area.</p> <p><u>Counties</u>: Completed field screening of 50% of the conveyance systems in urban/higher density rural sub-basins and at least 1 rural sub-basin. (Required by February 15, 2012, S5.C.8.b.vi)</p>	NA		Requirement not yet due. Clark County has completed screening for most of the Urban Growth Area and several rural subwatersheds.	
56	Upon discovery or upon receiving a report of a suspected illicit connection, initiated an investigation within 21 days. (S5.C.8.b.vii(1))	Y		Indoor vehicle repair shop with floor drains to bioswale.	
56a	Number of investigations:		1		
57	<p>Upon confirmation of the illicit connection, used enforcement authority to eliminate the illicit connection within 6 months. (S5.C.8.b.vii(2))</p> <p>List nature of enforcement actions in <i>Comments</i> field.</p>	Y		Hook-up to sanitary sewer competed in 45 days. Work was verified by a county inspector.	
57a	Number of enforcement actions:		1		
57b	Number of illicit connections eliminated:		1		
58	Contacted Ecology immediately upon discovering an illicit connection presented a severe threat to human health or the environment. (S5.C.8.b.vii(3). See also question 7 of this report.)	NA		None discovered.	
58a	Number of illicit connections identified as presenting severe threat to human health or the environment:		0		

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
59	Referred to Ecology illicit connection(s) after making a good faith and documented effort of progressive enforcement to terminate the violation(s). (S5.C.8.b.vii(3))	NA		None of these situations occurred.	
59a	Number of referrals to Ecology:		0		
60	Participated in a regional emergency response program or developed and implemented procedures to investigate and response to spills and improper disposal into the MS4. (Required by August 15, 2007, S5.C.8.b.vii)	Y			
61	Developed a program to prioritize and investigate complaints/reports or monitoring information that indicate potential illicit discharges, including spills. (Required by August 15, 2007, S5.C.8.b.viii)	Y			
S5.C.9 Operation and Maintenance Program					
62	Established maintenance standards as protective, or more protective, of facility function than those specified in Chapter 4 of Volume V of the 2005 <i>Stormwater Management Manual for Western Washington</i> , and in accordance with the provisions in S5.C.9.b.i. (Required by August 15, 2008, S5.C.9.b.i)	Y		Maintenance standards under the 1999 permit were in force until April 2009, when standards equivalent to the 2005 SWMMWW became effective under county code.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
63	Evaluated and, if necessary, updated existing ordinances or enforceable documents requiring maintenance of all permanent stormwater treatment and flow control facilities, including catch basins, regulated by the Permittee, in accordance with maintenance standards established under S5.C.9.b.i. (<i>Required</i> by August 15, 2008, S5.C.9.b.ii(1))	NA		Completed in 2008.	
64	Developed and implemented an initial inspection schedule for all known, permanent stormwater treatment and flow control facilities (other than catch basins) regulated by the Permittee that involves an inspection of each facility at least once during this permit term. (<i>Required</i> by August 15, 2008, S5.C.9.b.ii(2))	Y		Inspection of regulated facilities followed standards adopted under the 1999 permit during some of 2009. After April 2009, inspection standards equivalent to the 2005 SWMMWW applied to regulated facility inspections. During 2009, 321 regulated facility inspections were performed.	
65	Developed and implemented an ongoing inspection schedule to annually inspect all stormwater treatment and flow control facilities (other than catch basins) regulated by the Permittee. (<i>Required</i> to begin by February 15, 2011, S5.C.9.b.ii(3))	NA		Requirement not yet due.	
66	Reduced the frequency of inspections to less than annually for stormwater treatment and flow control facilities (other than catch basins) regulated by the Permittee. Indicate in comments below if reduction is based on maintenance records or certification pursuant to S5.C.9.b.ii(3)).	NA		Not a minimum performance requirement.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
67	Managing maintenance activities to inspect new permanent stormwater treatment and flow control facilities, including catch basins, in new residential developments every 6 months during period of heaviest construction to identify maintenance needs and enforce compliance. (Required to begin by February 15, 2009, S5.C.9.b.ii(4))	Y		One Code Enforcement officer monitored residential subdivision projects after completion of the infrastructure construction. Also, Public Works Operations began targeted maintenance inspections for projects with heavy home construction (defined as 50 percent of the subdivision lots having active building permits) during 2009.	
68	Required cleaning of catch basins found to be out of compliance with maintenance standards under the requirements of S5.C.7 (Source Control Program) and S5.C.8 (Illicit Discharges Detection and Elimination) or as part of facilities you regulate and inspected under S5.C.9 (Operation and Maintenance Program). (S5.C.9.b.ii(6))	Y		Source control inspections required nine businesses to clean their catch basins or oil/water separators.	
69	Developed and implemented a program to annually inspect all permanent stormwater treatment and flow control facilities (other than catch basins) owned or operated by the Permittee and to implement appropriate maintenance action in accordance with established maintenance standards. (Implementation required to begin by February 15, 2009, S5.C.9.b.iii(1))	Y		Inspections were completed in 2009 using standards adopted in April 2009. There were approximately 694 stormwater facilities, including treatment vaults inspected during 2009. This is 88 % of the Operations inventory.	

Question		Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
70	Changed the frequency of inspection schedule to less than annually for permanent stormwater treatment and flow control facilities (other than catch basins) owned or operated by the Permittee. Indicate in comments below if reduction is based on maintenance records or certification pursuant to S5.C.9.b.iii(1).	NA		Not a minimum performance requirement.	
71	Implemented a program to conduct spot checks of stormwater facilities owned or operated by Permittee (other than catch basins) after major storm events, and to respond to findings, in accordance with S5.C.9.b.iii(2). (<i>Required</i> to begin by February 15, 2009, S5.C.9.b.iii(2))	Y		Clark County maintains a list of facilities for spot inspections for various reasons including known problems due to falling leaves and heavy rainfall.	
72	Implemented program to annually inspect catch basins and inlets owned or operated by the Permittee in accordance with the provisions in S5.C.9.b.iv(1). (<i>Required</i> to begin by February 15, 2009, S5.C.9.b.iv(1))	Y		Clark County began annual circuit catch basin cleaning under the 1999 permit and continues it under the current permit.	
73	Changed the frequency of inspection schedule to less than annually for catch basins owned or operated by the Permittee. Indicate in comments below if reduction is based on maintenance records or certification pursuant to S5.C.9.b.iv(2)).	NA		Not a minimum performance requirement.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
74	Decant water from catch basin cleaning activities is disposed of in accordance with the requirements in Appendix 6. <i>(Required by February 15, 2009, S5.C.9.b.iv(3))</i>	Y			
75	Attached (as part of the Program Evaluation and Other Activities narrative in Section VII.B) a summary of maintenance or repair activities conducted by the Permittee requiring capital construction of \$25,000 or more. <i>(Required annually beginning with third annual report/for calendar year 2009, S5.C.9.b.v)</i>	NA		There were no facility maintenance projects completed during 2009 that cost more than \$25,000.	See Attachment B.
76	Established practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads or highways owned or operated by the Permittee, and road maintenance activities listed in S5.C.9.b.vi conducted by the Permittee. <i>(Required by February 15, 2008, S5.C.9.b.vi)</i>	Y		Practices were established under the 1999 permit to meet the requirements of Chapter 13.26A CCC and to protect salmon habitat by joining the ESA Regional Forum.	
77	Implemented the established practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads or highways owned or operated by the Permittee, and road maintenance activities listed in S5.C.9.b.vi conducted by the Permittee. <i>(Required by August 15, 2008, S5.C.9.b.vi)</i>	Y		Public Works Operations implements the Clark County BMP manuals and the ESA Regional Road Maintenance Program Guidelines. General Services ensures proper maintenance of parking areas at county facilities including annual catch basin cleaning and routine sweeping.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
78	Established and implemented policies and procedures, which address activities and lands listed in S5.C.9.b.vii, to reduce pollutants in discharges from lands owned or maintained by the Permittee. (Required by August 15, 2008, S5.C.9.b.vii)	Y		Almost all maintained county property is operated by the Public Works Department, which follows policies and procedures put in place under the 1999 permit to reduce pollutants. However, it is not possible to state that all properties meet this requirement because there are over 1200 tax lots owned by the county, many of which have no custodial department specified.	
79	Developed and implemented an ongoing training program for Permittee employees with primary construction, operations or maintenance job functions that could impact stormwater quality (Required by February 15, 2009, S5.C.9.b.viii.)	Y			
80	Developed and implemented Stormwater Pollution Prevention Plan(s) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not covered under another Ecology-issued stormwater discharge permit. (Required by February 15, 2009, S5.C.9.b.xi)	N		During 2009, Public Works developed a SWPPP for each Maintenance Shed and storage yard to prevent contamination of stormwater runoff. Staff has received training on addressing spill situations and Best Management Practices (BMPs). Plan will be reviewed annually.	

Question		Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
S5.C.10 Education and Outreach Program					
81	Implemented or participated in an education and outreach program designed to achieve measurable improvements in understanding of the problem and associated solutions for the target audiences listed in S5.C.10.b. (<i>Required</i> by February 15, 2008, S5.C.10.b.i)	Y		A variety of approaches are used to reach target audiences, including: e-newsletters, regional advertising campaigns, training sessions, workshops, web pages, site visits for source control and facility maintenance compliance, public outreach for code development, school assemblies, volunteer monitoring, and billboards.	
82	Implemented or participated in an effort to measure understanding and adoption of the targeted behaviors by at least one target audience in at least one subject area (<i>Required</i> to begin February 15, 2008, S5.C.10.b.ii)	Y		A survey of public knowledge measured baseline conditions in 2007. Post-workshop surveys are used to measure intent to adopt behaviors.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
S7. Compliance with Total Maximum Daily Load Requirements				
83 Is there a Total Maximum Daily Load (TMDL) listed in Appendix 2 applicable to you? (S7)	N			
84 Attached (as part of the Program Evaluation and Other Activities narrative in Section VII.B) a summary of the status of TMDL implementation activities conducted by the Permittee, and/or on behalf of the Permittee, including as applicable: <ul style="list-style-type: none"> • How TMDL-related activities are incorporated into the SWMP or other permit requirements, such as monitoring • Any lists or inventories required • Description of inspections, including total number of sites targeted and number of inspections conducted • Any specific deadlines or milestones reached in the reporting term and associated dates • Selected monitoring and implementation approaches, where options are described in Appendix 2 • Other information necessary to provide a summary of the TMDL implementation status 	NA		TMDLs for Salmon Creek and Gibbons Creek include load allocations for nonpoint sources but no waste load allocations applicable to the NPDES permit. TMDL plans include Clark County performing actions to comply with the NPDES municipal stormwater permit.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
85	NA		None apply to Clark County.	
S8. Monitoring				
86	NA		No completed study conducted stormwater sampling directly from the county MS4. One study in the Lakeshore subwatershed collected standard grab samples from at least one stormwater discharge point. That study will be completed in 2010.	
General Conditions				
87	Y		Verbally and in emails notified Ecology of schedule to begin monitoring at S8 sites. Notification for non-compliance associated with adoption of standards equivalent to the 2005 SWMMWW was made in 2008.	
88	Y		Mt Vista stormwater facility landslide was reported as a spill of mud to a tributary of Mill Creek in January 2009.	
88a	Y		Mt Vista facility landslide: A large storm event caused a landslide at a stormwater facility that deposited sand and mud on the floodplain of a tributary to Mill Creek. The event was discussed with the Ecology permit manager, who said that reporting it as a spill was adequate because there was not an ongoing source of pollutants from the MS4.	
S9. Low Impact Development (LID) Reporting				
89	Y			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
90 Attached (As part of the Program Evaluation and Other Activities narrative in Section VII.B) a summary of the extent to which basin or watershed planning is being conducted in the Permittee's jurisdiction, either voluntarily, or pursuant to the Growth Management Act or any other requirement (S9.E.11).	Y			
91 Attached (As part of the Program Evaluation and Other Activities narrative in Section VII.B) identified areas for potential basin or watershed planning that can incorporate development strategies as a water quality management tool to protect aquatic resources. This reporting requirement is due only in the Annual Report for calendar year 2010 (S9.E.12).	NA		Requirement not yet due.	
S8.H Monitoring				
92 Attached (per Section VIII) the Annual Stormwater Monitoring Report(s) for S8.D, S8.E and S8.F (S8.H and S9.E.5).	NA		Requirement not yet due.	

REMINDER: Save your work as you go. Did you answer each question, provide necessary background information in the # and/or *Comments* field, and attach and/or note the filename and page number of all required documentation in the *Attachment* field? Proceed to the Attachments (**Section VII**) tab next.

VIII. Annual Stormwater Monitoring Report (S8.H and S9.E.5)

Refer to the Annual Stormwater Monitoring Report contents guidance for additional information regarding Ecology's expectations for this report.

Attachment B. Program Evaluation and Other Activities Narrative

1. Notification of Changes to Certification and Signature

Report certification is by the Chair of the Board of Clark County Commissioners.

2. Actions Taken Pursuant to S4.F. Notifications Discharges Causing or Contributing to a Water Quality Violation

No actions were taken pursuant to S4.F. One project included monitoring above and below a group of county outfalls. The project found the potential for dry weather bacteria discharges from one or more of the outfalls. The results of this monitoring were referred to the Illicit Discharge Detection and Elimination program for investigation.

3. Assessment of Program Design and BMPs

Permit requirement S8.B.2. requires the annual report to include: “an assessment of the appropriateness of the BMPs identified by the Permittee for each component of the SWMP; and any changes made, or anticipated to be made, to the BMPs that were previously selected to implement the SWMP, and why.” Annual report instructions include the components required to be reported on, limiting reporting to S5.C.4 through S5.C.10.

Since the permit generally prescribes the required BMPs and management actions, little can be done to change them within the permit term. The following section includes a brief analysis of effectiveness and suggests potential changes by permit component.

3.1. Public Involvement and Participation

The county has an appointed commission to advise the Board of Clark County Commissioners on stormwater management program development and implementation. This group, the Clean Water Commission, typically meets monthly to review program activities. Their advice is provided to the Board in an annual report and occasionally in special reports. Having a group like this is an effective way to channel input to policy makers on topics that are complex and generally poorly understood by the general public.

A well-written, accessible SWMP plan can be an important tool to promote understanding of the program. With sufficient detail, the SWMP can guide each program and its personnel to complete the stormwater program activities. Consequently, Clark County has revised the format of its SWMP plan to include greater detail and responsibility matrices for each program component.

Outreach to the general public and potentially interested parties to develop the SWMP plan has yielded little input on the program. Interest in the program is usually associated with specific actions that affect the actions of some segment of the community.

Public involvement to develop stormwater ordinance revisions as an element of implementing the SWMP helped inform the regulated community about the proposed code revisions and provided feedback used by elected officials to form county policies for alternative approaches to meeting permit requirements.

3.2. Controlling Runoff from New Development, Redevelopment and Construction Sites

The Minimum Requirements and BMPs are specified under the permit and not possible to change without a permit modification. Pollutant removal performance for public domain treatment facilities and flow reduction BMP effectiveness will be evaluated by the permittees under Special Condition S8, helping to decide BMP appropriateness for uses prescribed by the Ecology stormwater manual.

Clark County believes that the permit's approach to regulating stormwater flow controls for development and redevelopment using on-site facilities could be improved upon by implementing a program to place flow control facilities where they are most protective of stream habitat. In January 2010 Clark County began implementing the Development and Redevelopment Flow Control Mitigation Program under an agreed order with Ecology. The approach is to require development and redevelopment projects to control flow durations on site to match existing conditions. Any difference between existing conditions and historical land cover is made up by flow control projects designed and built by the county Stormwater Capital Improvement Program. The program is described in the SWMP page 72.

3.3. Structural Stormwater Controls

Structural controls are selected to provide the most possible treatment, flow control and habitat benefit that project sites can provide. Field and other data are used to decide if a location is appropriate for a specific potential project. No monitoring projects are in place to test the effectiveness of individual projects built by the stormwater program. Capital project treatment and flow control capacity is based on the presumptions of standard design criteria in the Stormwater Management Manual for Western Washington. Field observations suggest certain facilities, such as treatment wetlands, provide habitat benefits beyond basic water quality treatment and hydrologic mitigation.

3.4. Source Controls for Existing Development

The source control inspection program uses sweeps to visit all businesses in a geographic area. The area sweeps appear to be an effective tool to reach large numbers of businesses using a consistent and equitable approach. Targeting a geographic area also includes the benefit of carrying a water quality-protection message tied to the area's receiving water. The approach is compatible with, but differs from, the permit approach of targeting businesses using SIC codes.

3.5. Illicit Connections Detection and Elimination

Significant effort is spent screening large numbers of outfalls for illicit discharges and the activity occasionally leads to discovery and removal of illicit connections that sometimes contribute large pollutant loads (particularly fecal coliform bacteria, wash water, and

vehicle maintenance-related pollutants). Field screening crews also spot source control problems as they travel between outfall screening points.

While some illicit discharges are discovered by screening, the majority of illicit connections and discharges are found during source control inspections, responding to complaints from the public and following up on referrals from local agencies.

3.6. Operation and Maintenance Program

Operation and maintenance standards for stormwater facilities and pollution control BMPs are largely prescribed the NPDES permit and ESA 4(d) compliance measures. All available O and M resources are dedicated to making inspections and achieving the maintenance standards. Once several years of stormwater facility maintenance inspections are completed, the frequency of inspections may be adjusted to make the most effective use of personnel.

Education to improve regulated stormwater control facility maintenance by homeowners associations is not a specific permit requirement. However, a major effort of the O and M program is working with subdivision homeowners associations to bring their regulated facilities into compliance with maintenance standards. To respond to this need, the county developed a project to create and distribute outreach materials and conduct workshops to assist residential facility owners. The project is in cooperation with cities and funded in part by an Ecology Grant.

3.7. Education and Outreach Program

The permit has specific requirements for evaluating the effectiveness of education and outreach to target audiences such as mobile businesses, developers, and construction contractors. Current efforts to gauge understanding focus on the general public through scientifically-designed surveys.

As is the case with many stormwater BMPs, evaluating the effectiveness of one class of BMP apart from the entire program is difficult. With voluntary BMP implementation by the public, it is very difficult to separate actions caused by the SWMP from those caused by factors not controlled by the permittee. Methods to attribute changes in target audience behavior due to the education program are difficult to implement. For example, an improvement in the quality of stormwater site plan submittals could reflect better understanding due to program outreach or simply reflect increasing familiarity with new regulations due to increased experience.

Clark County and other local municipalities' programs include significant effort to reach schoolchildren. While schoolchildren are not a target audience identified in the permit, the county believes targeting education toward them it is an appropriate and effective tool.

Clark County's targeted effectiveness monitoring under permit condition S8 includes evaluation of outreach directed at reducing pesticide and fertilizers in stormwater discharges from a specific area. The project includes surveys of the target area and

ongoing stormwater monitoring. Results of initial monitoring will guide development of the outreach materials and inform residents of specific pollutants from their neighborhood.

4. Information on S5.C.6. Structural Stormwater Program

This information is provided in the SWMP (page 62).

5. Summary of actions taken to comply with applicable TMDL requirements (S9.E.4).

No Clark County waterbody TMDLs are listed in Appendix 2 of the June 2009 permit. No TMDL waste load allocations have been approved in Clark County since issuance of the permit.

Clark County implements TMDLs by implementing its stormwater management program. During 2009, the county also participated in implementing the Salmon Creek bacteria TMDL by conducting water quality monitoring in Morgan Creek as part of the Stormwater Needs Assessment Program, and participating in the TMDL implementation plan update process.

6. Brief description of any stormwater monitoring studies not part of your Annual Stormwater Monitoring Report involving your MS4 in accordance with S8.B.1 (S9.E.6).

Clark County began a study of Vancouver Lake and Lake River tributaries in the Lakeshore subwatershed in water year 2009. The study collected monthly grab samples for basic water quality parameters. Several of the sites included storm sewer systems that replaced a natural drainage network. Results from this study will be summarized in a report completed in 2010.

7. Operations and Maintenance Information

7.1. Justification for a change of inspection frequency

The permit allows changes to inspection frequency if justified by inspection and maintenance records. No change of inspection frequency is requested.

7.2. Information on facility repair greater than \$25,000

One stormwater facility repair project with an estimated cost of greater than \$25,000 was identified in 2009 associated with the Mt Vista facility. Another project to repair an outfall causing excessive erosion was completed in 2009. After review of the 2009 facility inspection results, there may be additional repair projects having estimated costs greater than \$25,000.

Facility Project	Estimated Cost	Status
Mill Creek Tributary Outfall Repair	\$40,000	Construction in 2009-2010
Mt Vista SWF Landslide Repair	\$208,000	Construction in 2011

8. Notification of Annexations

Several small annexations occurred in 2009 reducing the area in unincorporated Clark County. Annexations are described in Annual Report Question 1 and shown on Attachment C.

9. Summary of LID Reporting Requirements under S9.E.

9.1. Summary of Barriers to LID Implementation and Actions to Remove Them (S9.E.10.)

Before 2009, LID practices were not generally allowed by the Clark County stormwater code. Code revisions effective in 2009 allow the use of LID practices for treatment and flow control.

Code also now requires runoff reduction practices embodied in the 2005 SWMMWW Volume V, Chapter 5 for all projects meeting thresholds of 2,000 square feet of impervious area or 7,000 square feet of land disturbing activity.

Clark County's Wetland Protection Code, Chapter 40.450, includes provisions that promote the use of LID. These include:

- Allowing buffer width reductions for projects that make extensive use of runoff reduction BMPs.
- Allowing LID features in wetland buffers if approval criteria are met.
- Allowing wetland buffers to function as dispersion areas if criteria are met.

At this point, Ecology has yet to define the extent to which LID is feasible to implement under the NPDES municipal permit. This limits permittee ability to identify barriers to LID implementation. Nevertheless, typical barriers to implementing LID include:

- Development requirements unrelated to current stormwater standards such as screening requirements parking areas and sidewalks.
- Road requirements and standards that specify minimum widths.
- Minimum number of parking space requirements.
- Stormwater code requirements to place stormwater facilities on separate tracts when dedicated to the county.
- Restrictions in the use of right of way for stormwater control facilities.
- Zoning standards for lot size.
- Questions about O and M such as managing programs to inspect and maintain many small distributed BMPs.

Recently, Clark County and the City of Vancouver completed a study that identified barriers to sustainable, affordable, residential development. While the focus was on increasing efficient use of energy and water and reducing toxic materials in the environment, the project did examine stormwater management practices, identify barriers, and make broad recommendations. The primary barrier identified was that the stormwater code did not include LID BMPs, other barriers included reducing road and

driveway width requirements, reducing minimum parking requirements, and revising code reduce setbacks for above ground cisterns.

The county is in the very early stages of developing a large project to update development standards to meet current needs. This project will likely include removing barriers to LID implementation. If this project moves forward, next year's report will include a description of how it identified LID barriers and any steps to remove them.

A critical barrier to full LID implementation is the likely cost to complete development code revisions. This effort will require a large public involvement component, an ordinance review and revision process, and work to revise standards that have complex interconnections.

9.2. Summary of Basin or Watershed Planning is Being Conducted (S9.E.11.)

Several government-sponsored basin or watershed planning programs or projects are occurring in Clark County.

WRIA Planning

Ecology-sponsored WRIA Planning is being conducted in WRIA 27 and WRIA 28, which include all of Clark County. The Lower Columbia Fish Recovery Board is conducting the program.

Vancouver Lake Watershed Partnership

Vancouver Lake Watershed Partnership focusing mainly on the lake itself (See Page 127 of Attachment A.)

Clark County Stormwater Needs Assessment Program

The Clark County Stormwater Needs Assessment Program examines each sub-watershed served by the county MS4 and produces reports suitable to use as a basis for stormwater project identification. These studies are also used as background information for developing stormwater basin planning projects. (See Page 134 of Attachment A.)

Mill Creek Flow Duration Standard Project

The Clean Water Program is conducting a project to develop an alternative flow control standard for Mill Creek. This project provides information that can be the basis for further development of a stormwater basin plan for the Mill Creek sub-watershed.

Land Use Subarea Planning

Land use planning efforts that result in general stormwater management recommendations include the Highway 99 Subarea Plan, which includes recommendations to use LID stormwater practices as a retrofitting and redevelopment tool.

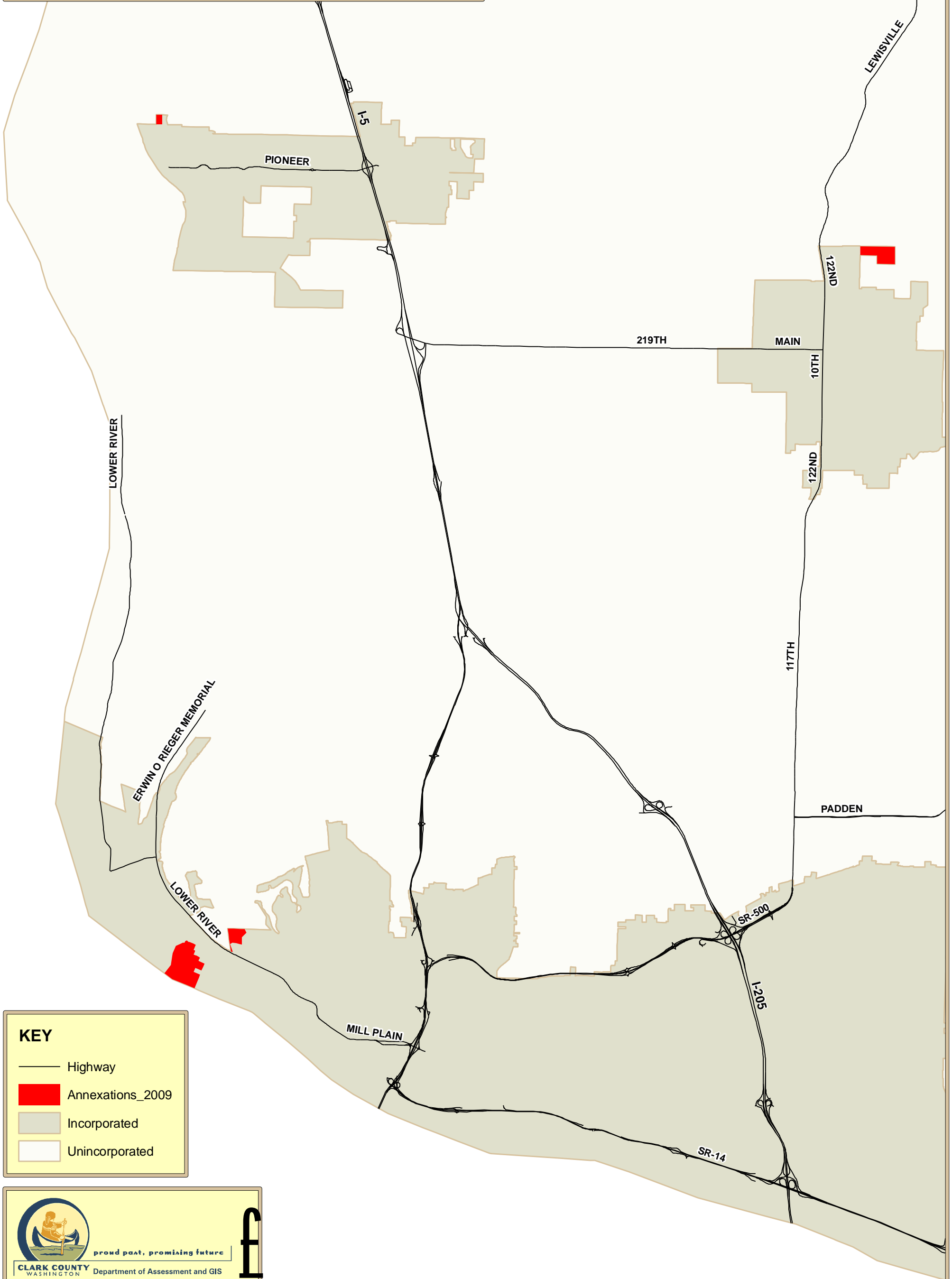
9.3. Areas for Potential Basin or Watershed Planning that Can Incorporate Development Strategies to Protect Aquatic Resources (S9.E.12.)

This reporting requirement begins for the 2010 report.

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**Attachment C. Map of 2009 Annexations of
Unincorporated Clark County into Cities**

2009 Annexations



KEY

- Highway
- Annexations_2009
- Incorporated
- Unincorporated



proud past. promising future

CLARK COUNTY WASHINGTON Department of Assessment and GIS

NOTE: Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.

0 3,500 7,000 14,000 Feet

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