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File: A14.11/D30.11

5 July 2011

Mr. Bill Moore, PE
Program Development Services Manager
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Evaluation of Port Angeles Urban Growth Area for Phase II Municipal Stormwater
NPDES General Permit Coverage

Dear Mr. Moore:

Thank you for your letter of May 10, 2011 notifying us that Ecology is evaluating the unincorporated areas of the Port Angeles Urban Growth Area (PAUGA) for possible coverage under the 2012 National Pollutant Discharge Elimination System (NPDES) Phase II Municipal Stormwater General Permit. We understand that this evaluation is in the early stages and we have opportunities to provide input as you progress with this evaluation. Clallam County will be glad to work with Ecology on this evaluation; nevertheless, we have some initial input as this evaluation begins.

What We Are Doing Now

Clallam County maintains our road-side stormwater conveyance systems (mostly ditches and culverts) consistent with practices in the 2002 Regional Road Maintenance Endangered Species Act Program Guidelines, requires new development to manage their on-site stormwater runoff, monitors the water quality and biologic health of our local streams, and conducts outreach on stormwater management. We recognize the importance of stormwater management and applied for and received a U.S. Environmental Protection Agency (EPA) West Coast Estuaries Initiative grant to enhance our current stormwater management efforts for unincorporated Clallam County based upon the NPDES Phase II Permit control measures and the 13 areas for comprehensive stormwater management identified in the Puget Sound Water Quality Management Plan.

Clallam County is working diligently toward the completion and adoption of its first comprehensive stormwater management plan. Our "Draft Comprehensive Stormwater Management Plan" dated April 15, 2011 is available for public review and comment and addresses current practices, issues, and strategies in the areas of public education, outreach, and involvement; construction site runoff

control; post construction runoff control; illicit discharge detection and elimination; pollution prevention/good housekeeping; stormwater monitoring; basin planning; and funding. Ecology representatives contributed to the Work Group charged to assist in the preparation of the current draft Plan.

Clallam County's Streamkeepers program and its 100-plus volunteers conduct regular, quarterly monitoring at established sites on streams throughout the County including the PAUGA. Streamkeepers measure components of stream health such as the quality of the water, the diversity of life forms, and the integrity of the physical habitat. Under the EPA grant, the County developed and received Ecology approval for a Quality Assurance Project Plan (QAPP) for the stormwater monitoring we use in collecting water quality samples during 20 storm events over the past two years in the Sequim area. The results of this pilot program will be evaluated for stormwater related monitoring in other areas of the County.

Criteria for NPDES Phase II Coverage

It is our understanding that the 2012 criteria for permit coverage will be similar to that used by Ecology prior to issuance of the 2007 general permit. If this is so, a preliminary evaluation of these criteria reveals that few, if any, of these criteria would be met. In short, we can identify few, if any, of the stormwater issues that the NPDES permit is designed to address for the following reasons:

1. The built environment (see attached map), with few exceptions, is significantly less developed within the unincorporated UGA when compared to the current City limits. The main exception is the US 101 corridor.
2. The major structure requiring stormwater control in the Port Angeles UGA is US 101, which is separately controlled by an NPDES permit issued to the Washington State Department of Transportation.
3. Beyond roadway ditches and culverts, the County has no significant "municipal separate storm sewer systems" in the area. In addition, impervious surface coverage of existing County roads within the unincorporated UGA is significantly less than within the incorporated UGA, and overall more similar to rural areas.
4. New development is already required to provide for stormwater management on the site. For example, the largest recent development within the unincorporated PAUGA was the Super Wal-Mart project, which had to address on-site stormwater flow controls and runoff treatment consistent with the 2005 Ecology Stormwater Manual.

Impacts Versus Benefits of Phase II Coverage

The unincorporated PAUGA comprises less than 0.5 percent of Clallam County. We hope the County does not end up having to manage one stormwater program in the unincorporated PAUGA and another in the rest of the County. In the stressed revenue and budget environment that local

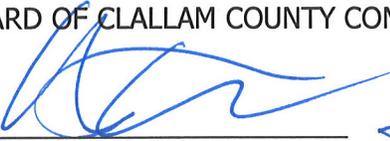
jurisdictions currently operate under, it must be recognized that the draft NPDES Phase II Permit language will impose significant new fiscal burdens on budgets that are already strained. The cost of implementing the proposed permit requirements appear quite substantial and we have no current revenue source for addressing them.

The characteristics of the unincorporated PAUGA do not merit NPDES coverage at this time. We believe the County is on an appropriate track to develop and implement a comprehensive stormwater management program for the unincorporated areas of Clallam County.

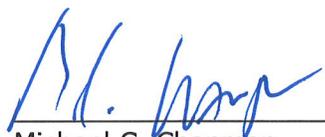
Finally, it should be noted, that the City of Port Angeles may annex lands within the unincorporated PAUGA. Annexation will generally coincide with new or redevelopment characterized by uses and densities requiring urban services. When this happens, the City's Phase II permit, along with its stormwater utility and revenue source, will automatically and appropriately extend to the UGA.

We appreciate the opportunity to provide these initial comments. Please keep our Public Works and Community Development staff closely involved in your evaluation.

BOARD OF CLALLAM COUNTY COMMISSIONERS


Howard V. Doherty, Jr., Chair


Stephen P. Tharinger


Michael C. Chapman

Attachment

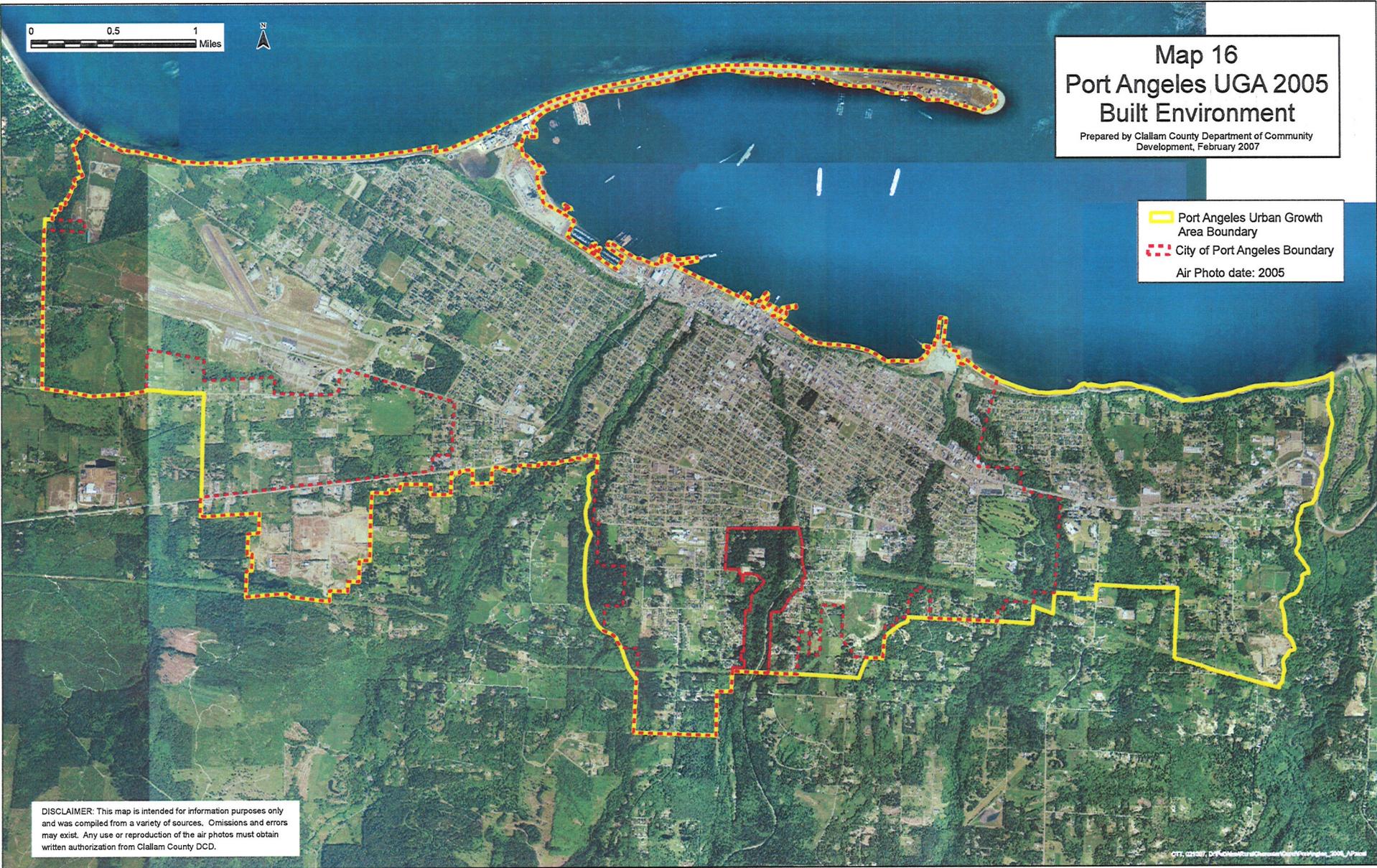
- c: Harriet Beale, Ecology HQ
- Vince McGowen, Ecology SWRO
- Ross Tyler, Clallam County Engineer
- Sheila Roark Miller, Clallam County Community Development Director
- Bob Martin, Clallam County Public Works Administrative Director
- Steve Gray, Clallam County Community Development Planning Manager
- Brian Cochrane, Yakima County
- Bill Oakes, Island County Public Works Director
- Derek Pohle, Grant County
- Michel See, Skagit County
- Shirley Kook, Lewis County
- Doug Dhondt, Kittitas County Engineer



Map 16 Port Angeles UGA 2005 Built Environment

Prepared by Clallam County Department of Community
Development, February 2007

-  Port Angeles Urban Growth Area Boundary
 -  City of Port Angeles Boundary
- Air Photo date: 2005



DISCLAIMER: This map is intended for information purposes only and was compiled from a variety of sources. Omissions and errors may exist. Any use or reproduction of the air photos must obtain written authorization from Clallam County DCD.