

ISLAND COUNTY PUBLIC WORKS DEPARTMENT

FEB 03 2012

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WATER QUALITY PROGRAM

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William E. Oakes, P.E., Public Works Director

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February 2, 2012

Ms. Harriet Beale
Municipal Stormwater Planner
Water Quality Program
Department of Ecology
PO Box 47600
Olympia WA 98540-7600

Re: Evaluation of the Unincorporated Urban Growth Area (UGA) of Oak Harbor for Phase II
Municipal Stormwater NPDES General Permit Coverage

Dear Ms. Beale,

I have reviewed the EPA publication EPA 833-f-00-003 (rev. Dec 2005) detailing how a small storm water system becomes designated as regulated and I question how the unincorporated UGA of Oak Harbor in Island County meets the criteria. One test is automatic for designation of an urbanized area (UA): a population of 50,000 and a density greater than 1,000 people per square mile. Clearly no such urbanized area exists anywhere in Island County. The other test requires evaluation for systems outside of a UA for a jurisdiction serving a population of at least 10,000 and a density of 1,000 per square mile. The UGA recognized in the Island County comprehensive plan is discontinuous, made up of several pockets of land on the border of Oak Harbor. There are less than 1,000 parcels and not all are residential and not all are developed. Clearly there would be less than 10,000 people under our jurisdiction in the UGA, there may not be 1,000 people residing in this area. Since there would appear to be well over a square mile in the UGA the density requirement of 1,000 per square mile would also appear to not be met. Lastly, we do not believe that the unincorporated UGA is contributing substantial pollutant loading to the regulated system of Oak Harbor.

Sincerely,

WILLIAM E. OAKES, P.E.
Director/County Engineer
Island County Public Works