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Board of Clallam County Commissioners

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Jim Jones, Jr. County Administrator

File: A72

16 October 2018

Department of Ecology
Vincent McGowan
P.O. Box 47600
Olympia, WA 98504-7600

Re: Phase II Municipal Stormwater Report for the Unincorporated Port Angeles Urban Growth Area

Dear Vincent,

First, we (Clallam County) want to thank Rich, Chris, Angela, and you for meeting with us on September 28, 2018 and sharing your views on the above subject. Additional letters will also be sent to you by the Director of Public Works and County Engineer and Director of Department of Community Development (DCD), and the County Hydrogeologist. They will add specificity to our more general comments.

FIRST AND FOREMOST, CLALLAM COUNTY DISAGREES WITH YOUR EVALUATION THAT THE UNINCORPORATED PORT ANGELES UGA (PAUGA) MEETS THE CRITERIA FOR PHASE II PERMIT COVERAGE. We did not meet the Department of Ecology's criteria in 2012, and if anything, conditions have improved since that date. Please review our letter to you dated 26 June, 2018.

We all desire clean water. However the County's analysis of the streams in the Port Angeles UGA is that they are generally in good to excellent condition except one. We described to you our current B-IBI sampling process of 24 sites to evaluate the current state of the streams in the County, and we will have these results by next summer. However, we have no reason to believe that these streams have been degraded in any way.

The Road Division of the Public Works Department is a founding member of the Regional Road Maintenance ESA Program. It uses the WSDOT 2014 Highway Runoff Manual and 2016 supplement, which is consistent with state and federal law and according to your department is equivalent to both of Ecology's Western and Eastern Washington stormwater management manuals for road projects,

which covers the County's MS4 consisting of roadside ditches and curb and gutters. Furthermore, as explained by the DCD Director, the Department is in the process of bringing forward a draft clearing and grading ordinance to the Planning Commission this Fall and is seeking funding to update the draft Comprehensive Stormwater Management Plan, draft Clallam County Small Project Drainage Requirements and Technical Guidance Manual as well as providing outreach and education on stormwater management and staff and local engineer training. Recently the Clallam County Board of Commissioners adopted illicit discharge and stormwater policies. We do not believe any improvement over our current practices should or would be required under any circumstances.


Also highlighted during our meeting was the fact that there has been a population decline and a corresponding significant reduction in impervious surfaces in this area. This is just one factor, but also very important in making your decision.

Finally, we also believe a legal analysis of this issue would conclude the unincorporated Port Angeles UGA should NOT be included in a Phase II permit.

As stated in our meeting, the County has limited resources. We all believe in clean water, but we also want to allocate these resources where they will do the most good for all of us. We do not believe this will be accomplished by including the unincorporated Port Angeles UGA in need of a phase II permit. The unincorporated area of the PAUGA is only 0.3% of the County's acreage and the MS4 population of 930 is only 2% of the unincorporated Clallam County population. Spending money on this task to benefit this small part of the County would mean that some other, more immediately pressing needs would go unmet.

Sincerely,

BOARD OF CLALLAM COUNTY COMMISSIONERS



Mark Ozias, Chair



Randy Johnson



Bill Peach