

October 23, 2018

The North Peninsula Building Association believes that the Port Angeles unincorporated Urban Growth Area does not meet the criteria, nor the population requirements, therefore, it should not be included in the NPDES Phase II permit area.

The County's Municipal Separate Storm Sewer System (MS4) structures consist of discrete, separated roadway ditches and curbs and gutters and are not included in any sewer component. The status of the County's MS4 in the unincorporated PAUGA has not changed since 2011; meaning that no new County MS4 ditches, curbs, or gutters have been added since Ecology's field survey in 2011. The County maintains these roadside storm water conveyances in accordance with the Regional Road Maintenance Endangered Species Act Program. The Clallam County Road Department is a member of the Regional Road Maintenance Program and uses the WSDOT 2014 Highway Runoff Manual and the February 2016 Supplement.

New development and redevelopment are required to provide for storm water management. County code requires storm water management to follow the existing storm water requirements, while most of the consultants that work in Clallam County have chosen to use the 2005 and 2012 Manuals and the 2014 amendment for storm water projects.

According to the Office of Financial Management (OFM), the population in the unincorporated PAUGA has decreased since 2011; it does not meet the 1,000 people per MS4 threshold or the 15% over a ten-year period of high growth rate in the petition criteria.

The County continues to recognize the importance of storm water management and to make progress toward a formal storm water management program. Clallam County has continued to and/or is in the process of adopting the Department of Ecology suggested regulatory requirements to ensure water quality and storm water management continues to improve.

Further, Stream keepers, an organization that Clallam County supports have volunteers that have collected Benthic Index of Biotic Integrity in the Port Angeles streams since 1998. It has shown no impairment in the portions of the creeks in the unincorporated areas although there is some impairment within the Port Angeles city limits which is already a NPDES Phase II permittee.

According to OFM's Small Area Estimate Program, the unincorporated Port Angeles UGA experienced a reduction in population from 2010 to 2017 with a -0.93 % growth rate. For the ten-year period of 2008 through 2017, the growth rate was -1.70%, which is far below the 15% over a ten year period of high growth rate provided in the petition criteria.

We suggest an impartial re-review of the criteria and details of adding the Port Angeles Urban Growth Area as a NPDES Phase II permittee, which we believe will result in a decision NOT to include it in as a Phase II permittee.



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