

Kay Kassinger

I am commenting on the proposed inclusion of the City of Port Angeles (COPA) unincorporated urban growth area (UGA) under the NPDES Phase II permit process. The water quality in the majority of the streams in the unincorporated COPA UGA is not impaired and in fact where water quality is less than a "good" rating, a source other than earth disturbing activities appears to be the cause. The process for development in Clallam County requires the Critical Areas Ordinance and Stormwater Regulations be followed to address the issues associated with earth disturbing activities. Obviously, stream water quality attests to the success of the current development standards. The inclusion of the COPA UGA in the NPDES Phase II permit process would be a ridiculous cost to the county to implement as an unfunded mandate for an area that does not have the impaired waterways like COPA and does not include a substantial population. This area of the county has less than 900 residents which does not meet a stated threshold of 1000 to be considered for inclusion in the NPDES Phase II permit process. Most of the residents in the COPA UGA are moderate to low-income households and the costs for homeowners to comply with the NPDES Phase II permits process would be detrimental to most in maintaining or improving their homes and to those trying to build housing so desperately needed in our community. They will face these issues soon enough when the time comes for the COPA to annex these areas. Expecting the County to develop and maintain a program for a NPDES Phase II permit system is not reasonable or a responsible use of limited tax dollars. These costs must be included in the review process, especially since you cannot show the waterways are impacted by earth disturbing activities and the threshold of 1000 residents is not met. I do not see what regulatory authority Ecology is using to include the unincorporated COPA UGA under a NPDES Phase II permit.

Phase I, WW Phase II, and EWA PH II Formal Draft Comments

Document	Section	Page	Comment
WWA Phase II	N/A		<p>I am commenting on the proposed inclusion of the City of Port Angeles (COPA) unincorporated urban growth area (UGA) under the NPDES Phase II permit process. The water quality in the majority of the streams in the unincorporated COPA UGA is not impaired and in fact where water quality is less than a "good" rating, a source other than earth disturbing activities appears to be the cause. The process for development in Clallam County requires the Critical Areas Ordinance and Stormwater Regulations be followed to address the issues associated with earth disturbing activities. Obviously, stream water quality attests to the success of the current development standards. The inclusion of the COPA UGA in the NPDES Phase II permit process would be a ridiculous cost to the county to implement as an unfunded mandate for an area that does not have the impaired waterways like COPA and does not include a substantial population. This area of the county has less than 900 residents which does not meet a stated threshold of 1000+ to be considered for inclusion in the NPDES Phase II permit process. Most of the residents in the COPA UGA are moderate to low-income households and the costs for homeowners to comply with the NPDES Phase II permits process would be detrimental to most in maintaining or improving their homes and to those trying to build housing so desperately needed in our community. They will face these issues soon enough when the time comes for the COPA to annex these areas. Expecting the County to develop and maintain a program for a NPDES Phase II permit system is not reasonable or a responsible use of limited tax dollars. These costs must be included in the review process, especially since you cannot show the waterways are impacted by earth disturbing activities and the threshold of 1000+ residents is not met. I do not see what regulatory authority Ecology is using to include the unincorporated COPA UGA under a NPDES Phase II permit.</p>