



414 High Street | PO BOX 1100  
Seaford, DE 19973  
302.629.9173  
302.629.9307 fax  
[www.seafordde.com](http://www.seafordde.com)



201 Mechanic Street  
Laurel, Delaware 19956  
302-875-2277  
302-875-2451 Fax  
[www.townoflaurel.net](http://www.townoflaurel.net)

**COMMENTS ON GENERAL PERMIT AUTHORIZATION FOR STORM  
WATER DISCHARGES FROM SMALL MUNICIPAL SEPARATE  
STORM SEWER SYSTEMS UNDER THE NATIONAL POLLUTANT  
DISCHARGE ELIMINATION SYSTEM AND THE LAWS OF THE  
STATE OF DELAWARE  
PHASE II MS4 TIER II GENERAL PERMIT  
DOCKET NO. 2022-P-W-0017**

**FEBRUARY 23, 2023**

**I. GENERAL COMMENTS**

The Town of Laurel (Laurel) and the City of Seaford (Seaford) appreciate the opportunity to comment on the Department of Natural Resources and Environmental Control's (DNREC's) revised draft of the proposed NPDES Phase II MS4 Tier II Permit (Revised Draft Permit or Revised GP).

Laurel and Seaford are submitting these comments to request that DNREC update the Revised Draft Permit to reference the 2020 Census and then exclude Laurel and Seaford from Table 1. Neither community qualifies for automatic designation under the 2020 Census. In addition, neither community qualifies under DNREC's designation criteria. If DNREC disagrees with either of these points, Laurel and Seaford request waiver from the regulated MS4 program.

Laurel and Seaford's comments follow.

**Laurel and Seaford Should Not Be Automatically Designated Under the GP**

On December 2, 2022, the U.S. Environmental Protection Agency (EPA) published a Direct Final Rule (87 Fed. Reg. 73965) and a Proposed Rule (87 Fed. Reg. 74066) to revise how MS4s are automatically designated under the Phase II MS4 program.

Since EPA issued the Phase II Rule in 1999 (64 Fed. Reg. 68722 (Dec. 8, 1999)), small MS4s have been automatically designated as Phase II permittees if the small MS4 is "located in an urbanized area as determined by the latest Decennial Census by the Bureau of the Census." 40 C.F.R. §122.32(a)(1). If a small MS4 is not located entirely within an

urbanized area, only the part of the system within the urbanized area is regulated.

EPA's December 2, 2022 Direct Final Rule and Proposed Rule would revise the regulation to automatically designate a small MS4 "located in an urban area with a population of 50,000 or more people as determined by the latest Decennial Census by the Bureau of the Census. (If your small MS4 is not located entirely within an urban area with a population of 50,000 or more people, only the portion that is within this urban area is regulated);" 87 Fed. Reg. 74066, 74071, 87 Fed. Reg. 73965, 73970.

EPA is making this change to align with the U.S. Census Bureau's decision in 2022 to eliminate "urbanized areas" and "urban clusters" under the 2020 Census. The U.S. Census Bureau now only refers to areas outside of rural areas as "urban areas," which are defined as comprising "at least 2,000 housing units or at least 5,000 persons." 87 Fed. Reg. 16706, 16711.

EPA's stated goal in revising the Phase II stormwater regulations is to remain as consistent as possible with its historic approach to designation—in the past, EPA has only been interested in regulating larger communities (i.e., those with populations greater than 50,000) under automatic designation. EPA makes this clear in the Direct Final Rule:

The most straightforward way for EPA to clarify its regulations in a manner that maintains program continuity and consistency is to replace the reference to "urbanized area" in the Phase II regulations with text that replicates the 50,000 population threshold on which the Census Bureau and NPDES authorities have historically relied. As discussed in Section II.D.2 of this preamble, from the inception of the small MS4 permitting program, the 50,000 population threshold has been used synonymously with the term "urbanized area" by both the Census Bureau and NPDES permitting authorities. Replacing the term "urbanized area" with text that incorporates this same 50,000 population threshold would mean that the existing method for designating small MS4s following the latest decennial census would be identical to how it has always been implemented. This proposed change would thus ensure that there is no disruption in the designation of new MS4s and that the program would be implemented in a historically consistent manner. 87 Fed. Reg. at 73968.

**Although Laurel and Seaford are identified in the 2020 Census as in an urban area (the "Seaford—Laurel—Bridgeville, DE" urban area), the total population for the Seaford-Laurel-Bridgeville urban area is 29,147, far shy of the 50,000 population in EPA's Direct Final Rule and Proposed Rule (see Attachment A, 2020 Census Urban Area List; see also 2020 Census Qualifying Urban areas and Final Criteria Classifications, 87 Fed. Reg. 80114, 80144).**

In other words, under EPA's new regulation, which will likely be finalized with an effective date of March 2, 2023, Laurel and Seaford are not automatically designated under the



Phase II regulations.<sup>1</sup>

DNREC should delete each community from Table 1 in the Revised Draft Permit.<sup>2</sup>

If DNREC moves forward with the Revised Draft Permit as currently proposed, the State will be out of sync with federal regulations, and, more importantly, will automatically designate communities that are so small that implementing a regulated MS4 program would be financially and operationally burdensome. Laurel has a population of 4,038 and Seaford has a population of 8,250 (as of 2021). Each community has a limited budget and staff to implement existing Town and City programs; neither has the capacity to develop and implement a new MS4 program. It is clear from EPA's Direct Final Rule and Proposed Rule (see quote above) that EPA does not intend to saddle small communities across the U.S. with the costs of managing a regulated MS4.<sup>3</sup>

It is particularly important that DNREC develop the right list of automatically designated MS4s before issuing the Tier II permit because EPA's position is "once in always in." In other words, if a community becomes a regulated MS4 under the 2020 Census, it will remain a designated MS4 no matter what happens in a future decennial Census.<sup>4</sup>

---

<sup>1</sup> EPA issued a Proposed Rule to allow the Agency to follow a traditional APA regulatory procedure if it received comments in opposition to the Direct Final Rule. Although EPA did receive comments from the Minnesota Cities Stormwater Coalition questioning the legality of EPA's "once in always in" policy for regulated MS4s (see discussion below), EPA has not yet withdrawn the Direct Final Rule (even though the March 2, 2023 effective date is imminent). This suggests EPA will be moving forward with the Direct Final Rule in approximately one week.

<sup>2</sup> In addition to updating Table 1 to reflect "MS4s Identified by the **2020** Census," and removing Seaford and Laurel, DNREC should delete the Town of Blades (currently Blades is listed but has a waiver in the Revised Draft Fact Sheet). Blades is a part of the Seaford—Laurel—Bridgeville urban area (total urban area population of 29,147). The Town of Federica (and presumably any stormwater drainage facilities it owns) does not appear to be in an urban area at all under the 2020 Census; the Town should be deleted as well (waiver should not be needed, as suggested by the Revised Draft Fact Sheet (p. 14-15) given the Town's lack of drainage in an urban area).

<sup>3</sup> DNREC shares this goal as a part of the waiver discussion in the Revised Draft Permit: "The inclusion of town population as a criterion demonstrates a recognition that the burden of maintaining a full storm water management program on small jurisdictions is potentially disproportionate to the water quality benefits." Revised Draft Permit, p. 30.

<sup>4</sup> From EPA's Proposed Rule: "The Census Bureau's elimination of the term "urbanized area" does not impact small MS4s that are already regulated under the Phase II rule. For those small MS4s already regulated because of their location in an "urbanized area" designated by a previous census, the Phase II regulatory history indicates that a subsequent Census Bureau change to the designation criteria for urbanized areas does not affect their regulatory status." 87 Fed. Reg. 74066, 74068-74069.



## **Laurel and Seaford Should Not Be Regulated Under the Designation Criteria**

For communities that are not automatically designated, the Revised Draft Permit includes designation criteria that DNREC will apply to determine whether to regulate a particular MS4. It is not clear from the Revised Draft Permit and Revised Draft Fact Sheet whether DNREC intends to use the criteria now to identify additional permittees or sometime after the GP is issued (this is suggested in the Revised Draft Fact Sheet at p. 16: DNREC will use the designation criteria “when conditions change between the 10-year Census designations that may warrant an entity to qualify for coverage under the MS4 Tier II General Permit.”)

If DNREC intends to use the designation criteria now, the Revised Draft Permit does not include a list of designated communities. Laurel and Seaford question whether DNREC will provide these communities with notice that DNREC is considering them for inclusion in the program, an opportunity to review the application of the designation criteria to their individual circumstances, and an opportunity to provide written comments on their behalf to address this issue. Not allowing for public comment would be fundamentally unfair and inconsistent with general legal principles that DNREC should only issue permits after public notice and opportunity for comment.

If DNREC intends to use the designation criteria at some point in the future, we assume proper notice and an opportunity to comment will be provided. We also assume that at some point DNREC will provide more details on what it means by “conditions change” during the interim period between Census timeframes.

DNREC’s Designation Criteria include: population density and growth, impacts on water quality, discharges to a TMDL waterbody, discharges to the State’s Exceptional Recreational and Ecologically Sensitive (ERES) waters, contiguity to an automatically designated urbanized area that discharges to TMDL or ERES waters, and impervious surface coverage above a certain percentage. DNREC will designate any entity that meets three of the criteria as a regulated MS4.

State regulations do not appear to include this designation criteria. Therefore, Laurel and Seaford assume DNREC is acting under federal law, not state law, for purposes of designation. DNREC’s designation criteria should, therefore, be consistent with federal law.

### ***Federal Law Requires a Process and Criteria for Designation***

Pursuant to 40 C.F.R. §122.32, an MS4 may be designated by the NPDES permitting authority pursuant to 40 C.F.R. §122.35(b)(3) or (b)(4).

In the Direct Final Rule published in December 2022, EPA provides the following guidance for determining significant water quality impacts necessitating designation: “...EPA recommends a balanced consideration of the following designation criteria on a watershed or other local basis: discharge to sensitive waters, high growth or growth

potential, high population density, contiguity to an urban area with a population of 50,000 people or more as determined by the latest Decennial Census by the Bureau of the Census, significant contributor of pollutants to waters of the United States, and ineffective protection of water quality by other programs;” 87 Fed. Reg. 73965, 73971.<sup>5</sup>

DNREC is then to apply those criteria, pursuant to (b)(3), at a minimum, to any small MS4 located outside of an urban area with a population of 50,000 people or more that is serving a jurisdiction with a population density of at least 1,000 people per square mile and a population of at least 10,000. If the MS4 meets the designation criteria, DNREC is to provide permit coverage.<sup>6</sup>

### ***Laurel and Seaford Do Not Meet the 10,000 Population Criteria***

Laurel and Seaford note that there is no reference to the size of the population in the Revised Draft Permit. Laurel and Seaford note that neither community has a population of 10,000; neither should be the focus of a designation review.

### ***Laurel and Seaford Do Not Meet DNREC’s Designation Criteria***

Even if DNREC were to conduct a designation review on Laurel and/or Seaford, neither would qualify under DNREC’s Designation Criteria. With regard to specific criteria, the communities state the following:

- **Population Density and Growth:** Neither community has had an increase in population density (at a rate above 20%), a high growth rate in the past three years, and/or a high growth potential for the next three years. Neither community has had a seasonal population increase of over 30% during peak vacation months.
- **Water Quality Impacts:** Neither community is a significant contributor of pollutant to waters of the State and/or is exhibiting ineffective protection of water quality.
- **Discharges to TMDL Waterbodies:** Neither community discharges to waters

---

<sup>5</sup> These criteria do not match the criteria in the Revised Draft Permit. For example, DNREC’s criteria suggest designation if an entity is contiguous to an urbanized area that is discharging to sensitive or ERES waters. EPA’s new guidance suggests the need to consider entities that are contiguous to large urban areas with more than 50,000 people, without reference to discharges from these areas to sensitive waters. As noted above, Laurel and Seaford submit that the federal criteria should apply.

<sup>6</sup> 40 C.F.R. 123.35(b)(4) states that DNREC should designate any small MS4 “that contributes substantially to the pollutant loadings of an interconnected MS4.” This aspect of the current federal regulations does not change under the Direct Final Rule, nor is it applicable to Laurel or Seaford.



of the State that have a TMDL which calls for pollutant reductions “beyond what can be achieved with existing programs” and the area is not already covered under automatic designation.<sup>7</sup>

- Contiguity to Automatically Designated Urbanized Area: Neither community is located contiguous to an automatically designated urban area under the 2020 Census (urban area with population of 50,000 or more). For that matter, neither community is located contiguous to an automatically designated MS4 that discharges to sensitive or ERES waters.
- Impervious Surface Coverage: Neither community has impervious surface coverage of greater than 35% for urban areas, 15% for residential developments, or 5% for rural areas.

### **Laurel and Seaford Qualify for a Waiver**

#### ***Even If Laurel and Seaford Were Considered Regulated Phase II MS4s, Both Communities Qualify for a Waiver***

DNREC states in the Revised Draft Permit that a new small MS4 with a population between 1,000 and 10,000 residents must “pass threshold criteria of controlling TP, TN and bacteria” through implementation of construction and post-construction sediment and stormwater management programs and “the replacement of onsite septic systems with centralized wastewater treatment” to qualify for a waiver. Revised Draft Permit, p. 32. Further, small MS4s that discharge to an ERES waterbody must contribute less than 1% of nutrients and bacteria, ensure construction and post-construction stormwater management, and be served by centralized wastewater to qualify. Revised Draft Permit, p. 33.

#### ***DNREC’s Waiver Criteria Should Be Consistent with Federal Law<sup>8</sup>***

Under 40 C.F.R. §123.35(d)(2), an NPDES permitting authority may waive permit

---

<sup>7</sup> The Nanticoke River Watershed Management Plan (Nov. 2014) provides specific implementation measures to address applicable TMDLs in the Upper Nanticoke – Nanticoke River and Broad Creek (which includes Laurel and Seaford, see Attachment B, Figure 3: Nanticoke River Planning Unit Watershed Locations). DNREC explains in the Plan (p. 54) that: “The management measures outlined in this section are well within the capacity of Delaware to administer given existing funding programs, public will, and systems in place.” In other words, there is a Plan in place that relies on existing programs and systems to reduce bacteria and nutrients. There is no indication that there is an additional need for reductions beyond the levels incorporated in the Plan.

<sup>8</sup> In fact, DNREC states in the Revised Draft Fact Sheet that “the Department preemptively has used the federal waiver criteria to evaluate several categories of small MS4s for applicability to the waiver process.” Revised Draft Fact Sheet, p. 12.

coverage for an MS4 in a jurisdiction with a population under 10,000 if certain criteria pertaining to the need for storm water controls pursuant to approved TMDLs and the potential for significant water quality impacts have been met.<sup>9</sup>

Federal law does not include any references to state construction or post-construction stormwater programs or the availability of centralized wastewater. Laurel and Seaford question DNREC's basis for imposing these requirements as part of a waiver review, even though both communities have stormwater programs in place and centralized wastewater. Further, DNREC's qualifier that discharges must comprise less than 1% of nutrients and bacteria seems unreasonably low, and DNREC has provided no explanation for this requirement. For these reasons, we urge DNREC to adopt the federal waiver criteria and apply them in a reasonable and justified manner.

On the 1% point, we understand that DNREC has completed an exercise, as evidenced by the table on p. 13 of the Revised Draft Fact Sheet that purports to identify the ratio of total nitrogen load reduction from the town to the watershed, with Laurel listed as 3.07% and Seaford as 6.31%. We have numerous questions about the table. For example, what TMDL development process was used to determine the loadings rates? What type of land use is included in the "town acres" and "watershed acres" (is there agricultural acreage included, for example)? What are the loading rates assumed by type of land use? If the Chesapeake Bay Model was used which version? Without knowing these answers, it is very difficult, short of hiring an expert to review applicable TMDLs, to determine whether the assumed percentages are accurate.

We can say, however, that from a general perspective, our MS4s are so small that we have little to no potential to exceed water quality standards, impair designated uses, or have significant water quality impacts. And, as noted above, current TMDLs and the Watershed Management Plan are more than adequate to drive pollutant reductions (i.e., additional stormwater controls are not needed based on TMDL wasteload allocations).

## **II. PERMIT SPECIFIC COMMENTS**

In addition to the general comments above regarding updating the Revised GP to reflect the 2020 Census, Laurel and Seaford offer the following specific comments regarding the Revised Draft Permit and Fact Sheet:

### **Additional Edits are Needed to Reflect the Remand Rule**

Laurel and Seaford agree with DNREC's statement in the Revised Fact Sheet (p. 18) about the underlying purpose for a Storm Water Management Program (SWMP) Plan: "*The intent is for new MS4s to submit their SWPM plan for review, though not for approval, per the Remand Rule. The SWMP plan will not be an enforceable document.*"

---

<sup>9</sup> EPA's Direct Final Rule will also apply waiver criteria for each small MS4 in a jurisdiction with a population under 1,000 within the urban area with a population of 50,000 people or more as determined by the latest Census where certain criteria are met. EPA has proposed changes to this section, which is (d)(1), but not to (d)(2).



There are a few sections of the Revised Draft GP and Fact Sheet, however, that suggest otherwise. Laurel and Seaford respectfully suggest additional edits in these sections:

Revised Draft GP, Part II.B (General Requirements) – Regulated Phase II MS4s should not have to update the SWMP plan “as required by the Department.” The SWMP plan is a planning document only; MS4s should have complete authority to revise it as needed without oversight by DNREC.

Revised Draft GP, Part II.D.3.c.7 – Regulated Phase II MS4s should not have to submit procedures on sanitary sewer overflows and leaking on-site sewage disposal systems to DNREC for “review and approval.” The only enforceable requirements are those found on the face of the GP; standard operating procedures are planning documents only.

Revised Draft Fact Sheet, p. 6 – DNREC has stated that it “may specify additional requirements or compliance schedules for any and all components of the permittee’s comprehensive storm water management program (SWMP) to meet the intent of the NPDES MS4 program and to achieve the level of implementation and progress deemed necessary to achieve water quality protection. This would include any area specific or site-specific requirements identified through the Department’s whole-basin or watershed assessment activities.” Not only does this raise a notice concern (see discussion below), but the Department should have no role in revising or approving permittee SWMP Plans. DNREC’s role should be limited to ensuring that a permittee has developed a SWMP Plan that includes the MCMs in the GP (without delving into the specifics of implementation for each MCM).

### **Permit Requirements Should Not Change Mid-Cycle**

MCM-4 and MCM-5 mandate that a permittee change its local regulatory mechanisms and SWMP plan for construction and post-construction stormwater based on changes to state and/or federal regulations (see Part II.D.4, Part II.D.5).<sup>10</sup> *See also* Draft Revised Fact Sheet at p. 9.

This raises a fundamental notice question. A permittee should know as soon as the permit is issued what it must do to comply. Changing the requirements mid-stream robs a permittee of the ability to plan for implementation over the five-year permit term and denies it the opportunity to review changes and provide comments on impacts to its local programs.

---

<sup>10</sup> From MCM-4: “Modifications or updates to state and/or federal regulations shall be implemented as required to maintain compliance with this permit. The permittee shall modify and update its SWMP plan to meet all the requirements of the updated Delaware Sediment and Stormwater Regulations.” From MCM-5: “Any modifications or updates to the Delaware Sediment and Stormwater Regulations shall be implemented as required. The permittees shall develop and implement a SWMP plan to meet all the requirements of the updated Delaware Sediment and Stormwater Regulations.”



\*\*\*\*\*

# **ATTACHMENT A**



## 2020 Census

Salamanca, NY	6,375	3,131	12,846,613	4.96	477,359	0.18	1,285.25
Salem, IL	7,153	3,350	12,683,018	4.90	167,909	0.06	1,460.71
Salem, IN	6,617	3,016	10,382,766	4.01	7,271	0.00	1,650.62
Salem, MO	4,684	2,359	8,167,350	3.15	0.00	0.00	1,485.37
Salem, NJ	5,927	2,861	7,962,412	3.07	177,232	0.07	1,927.92
Salem, OH	15,924	7,617	27,496,341	10.62	15,590	0.01	1,499.94
Salem, OR	268,331	101,688	188,247,416	72.68	176,238	0.07	3,691.81
Salida, CO	5,953	3,415	7,380,783	2.85	0.00	0.00	2,088.97
Salina, KS	46,547	20,770	58,340,373	22.53	58,589	0.02	2,066.43
Salinas, CA	177,532	48,914	77,392,699	29.88	101,332	0.04	5,941.20
Salinas--Coco, PR	13,938	7,628	13,362,231	5.16	30,944	0.01	2,701.59
Salisbury, MD--DE	78,075	32,638	125,341,432	48.39	4,258,719	1.64	1,613.30
Sallisaw, OK	7,513	3,431	14,075,536	5.43	66,774	0.03	1,382.44
Salt Lake City, UT	1,178,533	424,925	778,073,097	300.42	510,795	0.20	3,923.01
San Angelo, TX	99,982	43,410	127,600,935	49.27	2,639,628	1.02	2,029.39
San Antonio, TX	1,992,689	789,482	1,588,802,530	613.44	8,698,357	3.36	3,248.38
Sandersville, GA	7,097	3,344	21,537,788	8.32	115,345	0.04	853.44
San Diego, CA	3,070,300	1,149,240	1,747,527,134	674.72	37,840,003	14.61	4,550.45
San Diego Country Estates, CA	7,002	2,450	8,522,759	3.29	0.00	0.00	2,127.84
Sandpoint, ID	12,824	6,419	23,962,522	9.25	372,879	0.14	1,386.08
Sandusky--Port Clinton, OH	61,743	39,351	139,336,526	53.80	13,775,535	5.32	1,147.68
Sandy, OR	13,173	4,899	10,900,427	4.21	2,984	0.00	3,129.96
Sanford, ME	15,067	6,885	15,481,402	5.98	350,678	0.14	2,520.66
Sanford, NC	36,641	15,279	88,886,073	34.32	2,215,929	0.86	1,067.66
San Francisco--Oakland, CA	3,515,933	1,391,873	1,330,727,047	513.80	31,271,476	12.07	6,843.04
Sanger, CA	27,325	7,986	12,469,370	4.81	0.00	0.00	5,675.62
Sanger, TX	8,279	3,144	11,371,906	4.39	57,008	0.02	1,885.57
San Germán--Cabo Rojo--Sabana Grande, PR	97,241	51,393	182,823,924	70.59	1,496,050	0.58	1,377.57
San Jose, CA	1,837,446	658,649	739,386,477	285.48	1,271,373	0.49	6,436.37
San Juan, PR	1,844,410	888,356	1,977,727,163	763.60	23,788,757	9.18	2,415.40
San Luis, AZ	24,790	6,634	9,567,919	3.69	54,603	0.02	6,710.53
San Luis Obispo, CA	56,904	22,210	36,537,326	14.11	55,665	0.02	4,033.70
San Marcos, TX	70,801	30,583	63,296,277	24.44	115,426	0.04	2,897.07
Santa Barbara, CA	202,197	79,353	141,962,041	54.81	2,693,338	1.04	3,688.93
Santa Clarita, CA	278,031	93,011	201,619,528	77.85	1,441,456	0.56	3,571.56
Santa Cruz, CA	169,038	72,855	156,565,432	60.45	509,944	0.20	2,796.32
Santa Fe, NM	94,241	47,331	121,214,399	46.80	205,406	0.08	2,013.65
Santa Isabel, PR	9,742	4,866	7,760,927	3.00	11,547	0.00	3,251.11
Santa Maria, CA	143,609	42,245	70,087,992	27.06	197,276	0.08	5,306.84
Santa Paula, CA	30,675	9,189	12,857,643	4.96	10,736	0.00	6,179.04
Santa Rosa, CA	297,329	116,326	205,625,198	79.39	470,825	0.18	3,745.06
Saranac Lake, NY	5,163	3,084	8,023,763	3.10	668,094	0.26	1,666.56
Saratoga Springs, NY	75,684	37,354	143,950,664	55.58	548,657	0.21	1,361.72
Sauk Centre, MN	4,849	2,256	12,200,881	4.71	669,942	0.26	1,029.34
Sault Ste. Marie, MI	12,877	6,042	21,188,718	8.18	200,900	0.08	1,574.01
Savannah, GA	309,466	136,572	533,142,236	205.85	8,970,297	3.46	1,503.38
Savannah, MO	5,253	2,301	8,474,446	3.27	22,313	0.01	1,605.44
Savannah, TN	8,828	4,124	23,021,406	8.89	340	0.00	993.18
Sayre--Waverly, PA--NY	17,262	8,295	20,702,672	7.99	102,543	0.04	2,159.55
Scappoose, OR	9,652	4,025	14,996,854	5.79	3,907	0.00	1,666.92
Schuyler, NE	6,522	2,031	6,639,609	2.56	153,118	0.06	2,544.11
Schuylkill Haven--Orwigsburg, PA	14,265	6,482	26,583,395	10.26	22,563	0.01	1,389.82
Scott City, MO	4,949	2,238	12,280,907	4.74	2,613	0.00	1,043.72
Scottsbluff, NE	25,104	11,342	38,028,338	14.68	409,822	0.16	1,709.75
Scottsboro, AL	10,791	5,239	31,970,898	12.34	0.00	0.00	874.19
Scottsburg, IN	7,578	3,510	12,545,467	4.84	62,602	0.02	1,564.46
Scottsville, KY	4,637	2,192	12,362,421	4.77	16,054	0.01	971.47
Scranton, PA	366,713	172,990	419,995,196	162.16	8,627,792	3.33	2,261.41
Seabrook Island, SC	3,371	5,286	21,681,111	8.37	756,252	0.29	402.69
Seaford--Laurel--Bridgeville, DE	29,147	11,999	61,081,401	23.58	1,485,187	0.57	1,235.90
Seely, TX	6,385	2,718	14,718,390	5.68	160,229	0.06	1,123.57
Searcy, AR	26,652	11,658	55,270,493	21.34	109,609	0.04	1,248.92
Seaside, OR	9,183	6,525	12,945,296	5.00	173,105	0.07	1,837.26
Seaside--Monterey--Pacific Grove, CA	123,495	54,906	106,659,553	41.18	551,582	0.21	2,998.80
Seattle--Tacoma, WA	3,544,011	1,468,039	2,544,707,994	982.52	150,559,818	58.13	3,607.07
Sebastopol, CA	18,734	8,245	39,352,738	15.19	0.00	0.00	1,232.97
Sebring--Avon Park, FL	63,297	35,215	115,274,385	44.51	10,360,203	4.00	1,422.16
Sedalia, MO	26,043	12,068	44,138,673	17.04	188,349	0.07	1,528.16
Sedona, AZ	9,190	6,317	32,297,893	12.47	60,707	0.02	736.95
Seguin, TX	28,998	12,250	51,794,885	20.00	1,963,042	0.76	1,450.04
Selma, AL	21,207	10,472	47,365,604	18.29	330,985	0.13	1,159.62
Selma, CA	32,546	9,737	23,643,888	9.13	0.00	0.00	3,565.14
Seminole, OK	6,283	2,870	13,916,132	5.37	0.00	0.00	1,169.35
Seminole, TX	7,068	2,807	8,746,908	3.38	0.00	0.00	2,092.86
Senatobia, MS	6,817	2,275	10,157,776	3.92	120,368	0.05	1,738.17
Seneca, SC	23,105	11,870	80,399,807	31.04	270,088	0.10	744.30
Sequim, WA	24,864	12,889	82,553,227	31.87	1,509	0.00	780.07
Severance, CO	6,408	2,095	4,943,050	1.91	166,186	0.06	3,357.57
Sevierville, TN	34,032	18,818	120,196,084	46.41	0.00	0.00	733.32
Seward, NE	7,473	2,959	8,945,137	3.45	27,128	0.01	2,163.74

## **ATTACHMENT B**



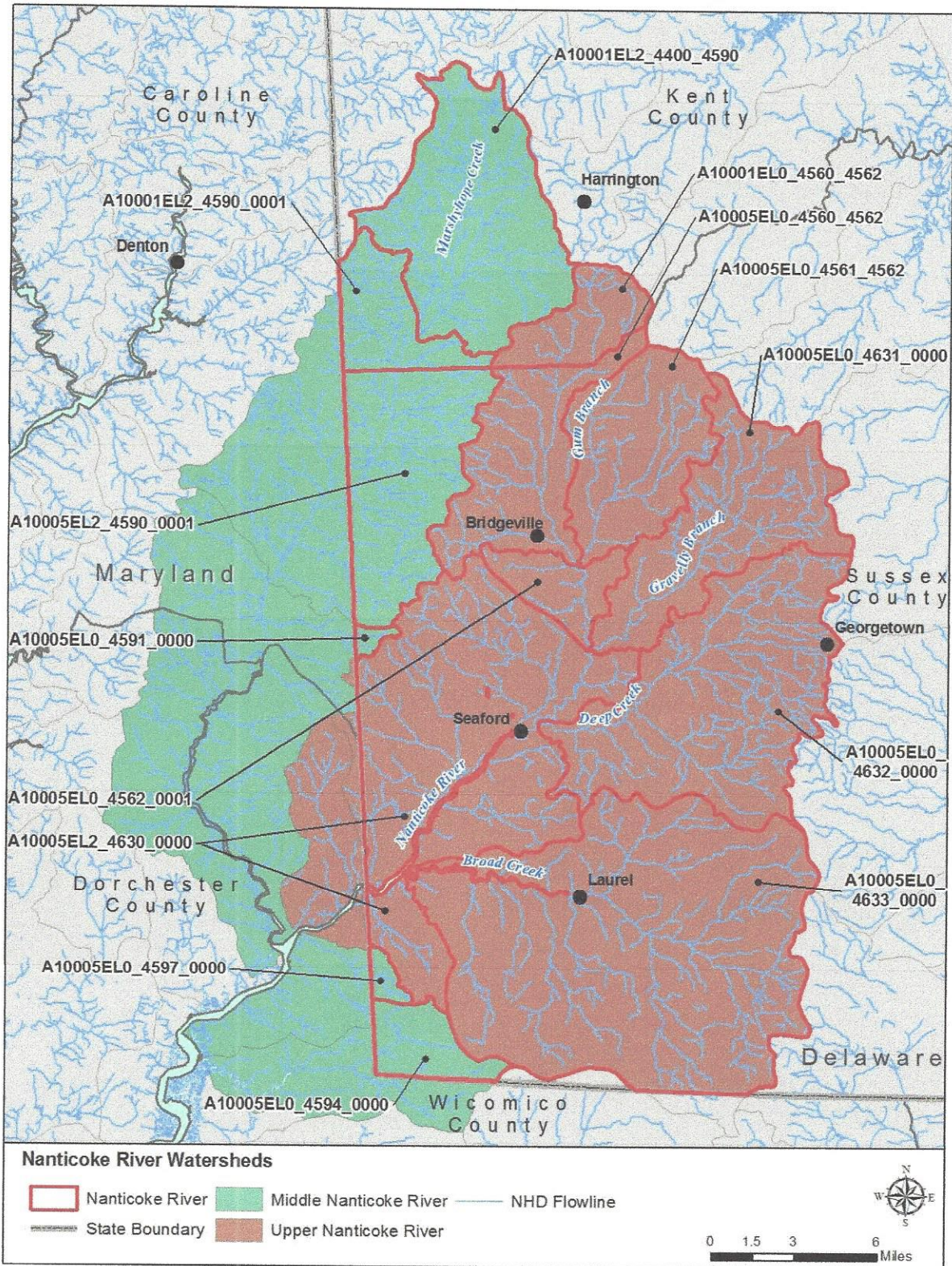


Figure 3: Nanticoke River Planning Unit Watershed Locations