## CSRWG 16 May 2008 Carteret County EDC

From: Carteret County EDC [mailto:edc@carteret.edu]

Sent: Tuesday, May 13, 2008 10:54 AM

To: George Givens (Research)

**Cc:** Mark Anderson; Jerry Jones; Doug Brady; Woody Warren; Joseph Barwick; Don Staub; John Langdon; Craig Conrad; Greg Lewis; Buck Fugate; Joan E Lamson; Dan Reitz; Terry

Frank; Chip King; Joan Lamson; Mike Kraszeski; Walter Compton

Subject: CSRWG

Per your request for comments:

Questions issues to be discussed/answered:

Page 1, Line 19: Define "draining to unnamed freshwater tributaries"

Page 1, Line 29: Define "Built upon area", versus "disturbed area" (Page 1, Line 8)

Page 1, Line 24: Unacceptable to reduce impervious surface to 12%. Suggest 22%.

Page 2 Line 14: Remove reference to one-year, 24-hour storm. Replace with 2 inches of rain.

Page 2, Line 16: What are the alternatives referred to and who has approval authority?

Page 2, Line 19-22 (and other): Definitions of vegetative filer, vegetated conveyance and vegetated buffer

Page 2, Line 29: What is considered a modification or redesign of a stormwater conveyance system?

P2 L31: If stormwater discharge cannot be increased through existing outfalls, can new outfalls be created?

P2 L33: Define non-erosive velocity, define vegetated buffer

P2 35: Define "providing effective infiltration"

P3 L 7: Remove 24% and replace with 30%.

P3 L 11-12 What is a "discrete stormwater collection system? Define.

P3 L14-15 Define vegetative buffer

P3 L20: Why are constructed wetlands acceptable and natural wetlands not? When do constructed wetlands become natural wetlands and are not allowed to be counted toward impervious surface calculations?

P3 L 23-25: Does all stormwater have to maintained on the property and can it be transported to off site locations on adjoining property?

P3 L 30: Why is there a requirement that treatment volume can not be drawn down faster than 48 hours?

P3-4 L35-36, 1-5: Add wetlands to calculations of impervious surface

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P4: L6-9: Define naturally occurring soil. Definition by DWQ

See following note from official at NC State Ports Authority in reference to Radio Island

I spoke with a local water quality representative (NCDENR/WQ) today to obtain clarification on the confusion that there seems to be with the 12" of naturally occurring soils. I was told that naturally occurring soils are defined as the soils that are present on the site before you start any construction activities. So the soils on Radio Island are considered naturally occurring.

The presence of naturally occurring soils however, does not guarantee that these soils will meet the minimum soil hydraulic conductivity criteria.

Thanks.

Todd C. Walton, NC Ports Rhonda Hall in the Wilmington DWQ office provide this information to the port

P 4 L11: Built Upon Area greater than 12%, not disturbed area P 4 L 12 Disturb more than 10,000 sq ft. Change to 1 acre. Remove any requirements on residential or commercial less than 1 acre.

## Additional request:

The ERC has within its powers and duties the authority to evaluate "Benefits of each program relative to costs:" (Article 12D, 120-70.42.(a)(1)a.) The Coastal Stormwater Rules have not had any accurate analysis to the costs or benefits. I request that this be accomplished prior to the rules being implemented and prior to the General Assembly considering any compromise rules.

Dave Inscoe, Executive Director Shirley Powell, Assistant Director Carteret Economic Development 3615 Arendell Street Morehead City, NC 28557 Dave 252 222-6122 (O) Shirley 252 222-6121 (O) Dave 252 808-7151 (C) 252 222-6124 (F) edc@carteret.edu http://www.carteretedc.com