

DT: April 30, 2008

TO: ERC Members
GA Members
Coastal Rules Stakeholders

RE: REQUEST FOR SCIENCE
For COASTAL RULES STAKEHOLDERS



DWQ/ EMC say pollution in stormwater from development causes serious pollution of shellfish waters.

However :

- * Areas with maximum development and minimum storm water treatment, have abundant shellfish beds. (1)
- * Waters with zero development and max. vegetated land, tested by EPA TMDL found polluted waters. (2)
- * Some waters closed by Marina Rules may actually be very clean .
- * A County with 25% increased development has virtually no increase of waters closed by Pollution. (3)

This is CONFUSING !

If Storm Waters from development causes serious Pollution ,

How can waters with no development be deemed polluted, and be harmful to humans or shellfish ?

How can waters with High Development have healthy (but closed) shellfish beds ?

What is pollution?

ALSO

The Land Alliance is concerned about other issues that DWQ / EMC does NOT address.

- * Gas/ Oil & Grease discharge from Storm Drains. (Filters could be paid for by the CWTF .)
- * Reduce Creek stagnation due to siltation at inlets. (Will reduced SW flow increase blockage?)
- * Concern that Buffers and Rain Gardens increases Natural Bacteria Pollution ?
- * Find and fix failing Septic Tank and other discharge problems .

DWQ / EMC presents Little Science and includes NO Rules on these issues .

DWQ/ EMC presents no In-State scientists to explain this confusion of Pollution Science .

VA. SC. & FLA . have found scientists to explain Pollution. (See: Isle Of Palms & Metro DC Reports.)

NC seems to be way behind other states in DNA pollution testing .

Do we need Out -Of -State scientists to explain NC Water Quality Issues and Pollution Science ?

NC Legislature authorized a study of Storm Waters, but DWQ/ EMC passing rules before study is done. Why?
Stakeholders should have valid data, and clear science, in order to formulate effective rules.

“ Let’s have rules that work”
thelandalliance.org

The Land Alliance of North Carolina
Larry Baldwin Bill Price

Isle of Palms Case Study - In 2001, the municipality of Isle of Palms in South Carolina solicited the services of General Engineering and Environmental, LLC to resolve recurring fecal contamination issues. Initially, human sources from housing developments were suspected as the principal source of contamination. DNA fingerprinting results showed otherwise.

Isle of Palms DNA Study (<http://www.sourcemolecular.com/pdfs/GEEComparisonAnalysis.pdf>)

DC Metro. VA Tech DNA Study LINK:: Wildlife // The Washington Post Company
<http://pqasb.pqarchiver.com/washingtonpost/access/1137264821.html?dids=1137264821:1137264821&FMT=ABS&FMTS=ABS:FT&fmac=&date=Sep+29%2C+2006&author=David+A.+Farenthold++Washington+Post+Staff+Writer&desc=Wildlife+Waste+Is+Major+Water+Polluter%2C+Studies+Say>)

FOOTNOTES

- ¹ Calico Creek (Morehead City) waters have maximum development and minimum SW retention , but abundant healthy oysters .
The area is closed to shellfishing, but the storm water doesn’t harm the shellfish. (How can this be?)
- ² EPA TMDL Study Jerrett Bay , NC.
- ³ Analysis of Carteret Co Waters ‘72 - ‘06 deducting waters closed by Marina Rules. [Within Standard Deviation of tests .]