



DT: May 20, 2008

TO: ERC Members  
GA Members  
Coastal Rules Stakeholders

RE: **Coastal Rules - So what ? Who Cares? What difference does it make?**

DWQ / EMC officials have rapidly passed new Coastal Rules that, they say, are intended to stop pollution from impervious surfaces of development, in order to stop pollution of shellfish waters.

Previous monographs suggest that DWQ/ EMC pollution science reports appear to be illogical, and that the tests used by Div. of Shellfish Sanitation are out-of-date for testing pollution of coastal waters today.

**So what?** DWQ/EMC officials have said, “ We’re going to impose these rules. It does not matter whether any city or county officials object, and So What if these rules might not have any benefits.

**Who Cares?** County and Municipal commissioners, managers, and officials that are responsible to their voters and taxpayers for reasonable management of the counties, towns, and cities have expressed their strongest possible objections to these new rules. As representatives of the citizens, they are responsible to provide good management of the various budgets, planning boards, school budgets etc.. They represent citizens they see face to face and day to day, yet their objections are being totally ignored. Yet a State Agency and Commission, hidden behind the amorphous barricade of State Power have more authority than do our elected officials. The leaders of the 18 of the 20 CAMA counties have asked that the rules be delayed, that the science be studied, and that any Rules should have some reasonable expectation that they will work.

**What difference does it make?** Even though DWQ officials have admitted there are no Guarantees the rules will improve water quality, and numerous unintended consequences of ill conceived rules are anticipated, the DWQ /EMC are undeterred.

A recent example of regulation > in advance < is the Morehead City Park/ Ball field, where DWQ staff requirements doubled the land area, doubled the cost, and added 2 ‘ of extra fill on a grass Park . There is no telling what it will cost to actually build a school building that would have impervious surfaces. Under the new DWQ/ EMC rules school construction costs will be greatly increased. Under the new DWQ/ EMC rules affordable Housing costs will be greatly increased. Under the new DWQ/ EMC rules Industrial / Jobs buildings costs will be greatly increased. Under the new DWQ/ EMC rules some taxpayers will lose the assets of generations or a life’s work?

**And for what?** Again, DWQ/EMC officials say there is NO guarantee the new Rules will have any benefits, and after three Stake holders meetings, State officials have not reasonably explained a single part of the rules.

Should we waste more of our tax dollars on an ill conceived experiment?

Yes, coastal Government leaders are very concerned.

Certainly, we all want clean water, and will do what it takes to have clean water, but it does not appear that these rules will do much if anything to provide clean water.

Should taxpayers pay for rules which are not expected to provide any benefit in return?

It seems that this environmental rule making process is broken .

The elected representatives of coastal counties and cities are not being heard. Why?

Our environment and our economies are too important for rule making to be so incautious.

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

**Land Alliance of North Carolina**  
**Bill Price**