

**CSRWG 26 June 2008**

**Baldwin**

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**From:** Larry F. Baldwin, CPSS/SC [mailto:LBaldwin@ec.rr.com]

**Sent:** Thursday, June 19, 2008 6:07 PM

**To:** Reeder, Tom NCDWQ; George Givens (Research)

**Subject:** CSRWG Coastal Stormwater Rules

Mr. Givens and Mr. Reeder,

Another item of concern before final edits regarding the proposed Coastal Stormwater Rules is Part b-2 of the June 16, 2008 edition. This part defines development activities < or > 1/2 mile of designated S.A. Waters which greatly impacts the potential density of these properties and ultimately a landowners asset.

----It seems appropriate to freeze the current S.A. Water designations by EMC to the effective date of these rules. If the S.C. and S.B. Water designations should be revised by the EMC to S.A. Water in the future, then many additional property owners would be significantly and unknowingly affected. It seems reasonable to revise Rule Part b-2 to state, "S.A. Waters as designated by the EMC on the effective date of these rules" in order to allow due expectations to these landowners.

----Lastly as to the effective date of these rules. It has been stated many times by the DWQ / EMC that the Best Management Practice (BMP), nor the Low Impact Development (LID) Manuals have been fully completed. Since the proposed rules reference many of these yet unestablished management practices, would it not be appropriate to set the effective date of the proposed coastal stormwater rules to a time after there has been a reasonable opportunity to review these management practices in progress??

Thank you again for the time and efforts put into this process.

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