

Mr. Tom Reeder
NC Dept of Natural Resources
Division of Water Quality Wetlands and Stormwater Branch
1617 Mail Service Center
Raleigh, NC 27699-1617

Dear Mr. Reeder

Thank you for the opportunity to express my views and concerns regarding the proposed stormwater regulation. As is almost always the case, when environmental regulations are proposed for implementation, there emerges significant conflict between those who support the new regulations as the best means to conserve and improve our environment while many involved in development activities oppose the regulations as too restrictive, costly or ineffective. Unfortunately, this instance is not proving to be the exception to that situation.

I have devoted my career -over 25 years- to economic and community development, yet I am a strong supporter of environmental conservation. Yet, it would be naive to deny conflict exists. Our economic and environmental interests in Eastern North Carolina are inextricably and permanently inter-twined. We must find ways by which conservationists and developers can reach common ground, otherwise we all lose. In an effort to begin to bridge the gap that exists between conservation and development interest, I have created an environmental advisory council within North Carolina's Eastern Region.

The first step towards the common ground that must be reached is to develop a regulatory process that *is* and *is perceived* by all as fair and comprehensive. I object to the implementation of the currently proposed regulations on the basis that they fail this test. While I am not qualified to comment on scientific validity and wisdom of the regulations on which you seek comment, I am concerned that two critical steps in developing good public policy are missing from the current process.

1. An independent and objective economic impact assessment must be conducted by a qualified third party to determine and quantify the costs of implementing the proposed regulations to local and state government agencies and to the private sector.

I understand that currently the Division of Water Quality does conduct a cursory economic impact assessment, however I do not believe this assessment is perceived by all to be independent, objective nor comprehensive. Further, it is critical that such an assessment be carried out by a third party that is qualified to conduct such impact studies.

2. Periodically, an independent and objective review and assessment of the effectiveness of the regulations must be conducted. Among many there is a belief that environmental regulations are promulgated less for the protection, preservation and improvement of the environment and more as a means to slow or

stop growth for its own sake. To maintain the confidence of all the people interested in these important regulatory aspects of government, North Carolina must be able to demonstrate that the regulations designed and implemented to improve the quality of our environment indeed have a measurable, positive impact on our precious environment.

I strongly believe that adopting these two recommendations as a permanent part of the regulatory development, implementation and review process will help to unify the interests of conservationists and developers. The steps I propose will build confidence by showing that the costs of implementing the regulations are justified by the resulting benefits. The periodic review of the effects of the regulations on the environment will further build confidence and support for the process by measuring and demonstrating – after the fact - that the regulations are having the desired beneficial affect.

Thank you again for the opportunity to comment during this important regulatory process.

Sincerely,

Albert A. Delia
President and CEO