

Apartment Association of North Carolina

Comments on Proposed Jordan Lake Stormwater Rules

Before the North Carolina Environmental Management Commission

July 17, 2007

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The Apartment Association of North Carolina consists of members from the mountains to the coast that collectively house 500,000 North Carolinians. Multi-Family rental housing is an important part of housing in North Carolina for both affordability and lifestyle reasons, and is a key to smart growth.

Our first reaction to the proposed Jordan Lake Stormwater Rules is that the process that led to them is not what we like to call "Comprehensive Planning" – that is, examining all the factors that need to be considered for such a proposal in a holistic way. Imagine if the North Carolina Building Code Council proposed doubling all the state's construction code requirements, or if the state Fire Services called for substantially higher standards in fire safety, or if the North Carolina Governor's Advocacy Council for Persons with Disabilities advocated for sweeping new accessibility rules, or if the NC Housing Finance Agency devised a way of tripling the supply of affordable housing. If each were adopted, the result would be considerably stronger buildings, considerably safer built environments, greater societal accessibility, and generously more affordable housing – but there would be significant unintended consequences because the proposals were not hammered out taking into account all pertinent factors. The Jordan Lake Stormwater Rules take a similarly narrow road to their recommendations.

Higher-density development offers the best solution to managing growth and protecting clean water, but this is not recognized in the proposed Jordan Lake Rules. Compact development can achieve a substantial reduction in runoff by minimizing impervious surface area, which causes erosion and polluted stormwater runoff. Higher-density housing is seen by many as a key to smart growth in urban North Carolina because it conserves scarce resources, leaves more land area for open space, and requires fewer miles of roads, curbs, sidewalks, sewers, and water lines than low-density sprawl. Much of the North Carolina road network is growing mainly for the purpose of connecting new low-density suburbs back to core communities. Along with water pollution, low-density development perpetuates the cycle of sprawl and fragments wildlife habitats.

What is needed in the Jordan Lake watershed is a comprehensive examination of future development pattern scenarios from environmental, fiscal, and urban service perspectives. Until that is done, the current approach to Jordan Lake Stormwater Rules has to be dismissed as far too narrow to best accommodate the complex dynamics at play in the region.