Memorandum

To: Environmental Management Commission (EMC)

From: Chatham County Board of Commissioners

Subject: Jordan Nutrient Rules

Date: August 23, 2007

The Board of Commissioners wishes to add written comments regarding the Environmental Management Commission's proposal to delay nitrogen reduction loading reduction to 2016. The Board of Commissioners strongly encourages the EMC to implement the rules as originally scheduled in 2011. By reference, attached is a resolution adopted by the Board of Commissioners in February, 2007 and forwarded to the Environmental Management Commission at that time.

We believe there are several substantive reasons to keep the target date to 2011. First, the lake is a major drinking water source for central North Carolina. Chatham County, for instance, gets the bulk of its potable water supply from Jordan Lake. Likewise, several other jurisdictions in our region use or have allocations to permit use of the lake for consumption.

Most of the lake's shoreline and most streams in Chatham County eventually discharge into Jordan Lake. We recognize our role in making the lake a gem of high quality. To that end, we are looking at ways to lessen runoff and improve the water that eventually makes it to the lake.

We are making progress on several fronts. Chatham is looking to increase stream buffers; we are in the middle of work to establish criteria for Environmental Impact Assessments for new developments in the Jordan Lake watershed; we are working on ways to amend our subdivision and zoning

ordinances such that we capture nitrogen and other pollutants that adversely affect the water quality of the lake.

All the evidence we've reviewed indicates that delaying implementation expedites the deterioration of the lake's water quality and really does nothing that we can see to remove Jordan Lake's name from the EPA 303(d) list of impaired waters. In fact, since rule making has begun, nutrient loading has increased.

Jordan Lake, as you know, is a large recreation area serving more than a 1,000,000 visitors annually. We believe that increasing the water quality will also foster its use as a recreation area. We believe the public expects the lake to be safe for water sports. The higher the water quality, consequently, the higher the lake's value is economically. Visitors invest in recreational activities, buy goods and services, and in other ways stimulate the economy.

We believe that moving the schedule back to its original date of 2011 gives adequate time nutrient loading contributors to adapt their processes to nutrient loading standards proposed for the lake.

We think the need for safe water for consumer use and for safe recreational use trumps other factors that suggest 2016 may be a better date for implementation.

We believe the time to act is sooner and not later.

Thank you for your attention to this memorandum.