

Messrs. Gannon & Robinson -

The purpose of this email is to express my opposition to the proposed Jordon Lake Rules for the following reasons:

1. The nutrient response model is not an accurate model
2. The EMC's attempt to reclassify all waters in the Jordan Lake to a water supply watershed designation is an unjustified, unfunded mandate
3. The nutrient control requirements for new development are excessive and will substantially increase the cost of homes, particularly for low/moderate income homebuyers
4. Agriculture and forestry contribute more nitrogen and phosphorus loading to the watershed than residential uses
5. The nutrient reduction requirements for existing development are not feasible
6. The proposed 50 foot riparian buffer requirement and the additional diffuse flow requirements are excessive and unjustified
7. Local governments do not have the statutory authority to create or administer nutrient offset programs

In short, the proposed rules would be costly, rigorous to implement, and unfairly place a disproportionate share of the burden of cleaning up Jordon Lake on new development, homeowners and local governments.

For these reasons, EMC should not implement the proposed rules.

David T. Finger

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