



Foust Backhoe LLC
1851 South Main Street
Graham, NC 27253

September 5, 2007

Rich Gannon
DENR/DWQ, Planning Section
1617 Mail Service Center
Raleigh, NC 27699-1617

Re: Jordan Lake Rules Comments

Mr. Gannon:

These comments are submitted expressing my opposition to the proposed Jordan Lake Rules. The rules represent an inequitable financial burden of responsibility for the Triad region of the Jordan Lake Watershed. The current proposed rule is an inadequate solution as it does not adequately address the primary pollutant sources in our predominantly rural region.

6 New Development requirements of the rule will drastically increase the cost of homes and property, increase development cost, increase water and sewer rates, increase taxes/fees, and potentially increase sprawl within the watershed. The proposed rule includes an unprecedented rule requirement for retrofitting of existing infrastructure in previously developed areas.

6 Phase II stormwater permitted communities should be exempt from these sections of the proposed rule. Stormwater Ordinances in our community just went into effect July of this year, thus these requirements are just beginning to be implemented. If it is the State's intent to take an "adaptive management" approach, these sections need to be abolished from the current rule and implemented through a phased approach based on the benefits realized through the Phase II Stormwater Permit program.

6 The current costs associated with this rule are exorbitant and the rule as presented represents an unfunded mandate. The entire financial burden is placed on the County and Local Governments in the region. This ultimately falls on the shoulders of individual tax and rate payers. This rule should include funding provided by the State of North Carolina.

I firmly believe that these rules, as currently written, will have a devastating impact on the Triad region and immediately place this region of the State at an economic disadvantage. Thank you for the opportunity to comment on the Jordan Lake Rules.

Sincerely,

Chris Foust
Managing Member / Foust Backhoe