

City of Graham

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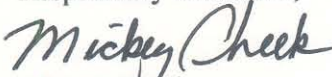
Mr. Rich Gannon
NCDENR/DWQ, Planning Section
1617 Mail Service Center
Raleigh, NC 27699-1617

Re: Jordan Lake Rules
Public Comments

Dear Mr. Gannon:

I am opposed to the Jordan Rules as written. Non-Point Source contributions of nitrogen and phosphorus to Jordan Reservoir are by far the greatest contributors to the Jordan Reservoir. This creates an inequitable assignment of responsibility; in that the rule places undue burden on cities and counties in the watershed. When you look at the non-point source loading, agriculture represents 36 percent of the nitrogen and 51 percent of the phosphorus load that is delivered to Jordan Reservoir from the non-point sources. This clearly demonstrates that the distribution of nutrient loading from all sources is not proportional and places very little pollutant load reduction requirements on agriculture. Furthermore, this rule does not require specific actions by any individual person or agricultural operation if the county or counties can achieve nutrient reduction targets. The Jordan Rules provide an optional voluntary strategy for agriculture land uses; in that they may elect to implement best management practices. Persons who implement standard best management practices within five years of effective date of this rule shall not be subject to any additional requirements that may be placed on agriculture operations. However, throughout the wastewater discharge requirements it states repeatedly that the Director shall establish more stringent limits for nitrogen or phosphorus upon finding that such limits are necessary to protect water quality standards in localized areas. In summary, agriculture is a much larger contributor of nitrogen and phosphorus to Jordan Reservoir than local governments, but local governments have a much higher proportion of costs and responsibility for this rule implementation.

Respectfully Submitted,



Mickey Cheek
City Council Member