

City of Graham

P.O. Drawer 357
201 South Main Street
Graham, North Carolina 27253
Tel: (336) 570-6700 / Fax: (336) 570-6703

July 17, 2007

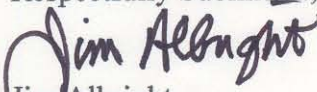
Re: Jordan Lake Rules
Public Hearing

I would like to express my opposition to the Jordan Lake Draft Rules. The proposed rules as written cause me to have very serious concerns about the benefits of its enactment.

1. There is NO assurance from DWQ that any water quality improvement will be realized even though huge dollar amounts would be spent.
2. These rules will have a tremendous impact on our citizens both from Water and Sewer Rate increases, as well as retro-fitting of existing development. Potentially, we are talking about the displacement of some of our homeowners - having to be forced to abandon their homes for new Stormwater BMPs. In some cases, we are talking about the elderly who built their dream home decades ago; long before Jordan Lake was built.
3. DWQ employees have stated that they have no funding available to update the Nutrient Model. DWQ employees have stated that they have no funding available to enter more recent data or to study the impact of atmospheric deposition of nitrogen on Lake Jordan. This lack of funding appears to be a major problem area for building public trust in the rules. Current proposed rules state that an "Adaptive Management Strategy" will be applied. If no resources are available now to update the model, add scientifically approved data from the United States Geological Service or the Haw River Clean Water Agencies, what assurances do we have that a true accounting of the improvements or worsening of Lake Jordan will ever be made?
4. Phase II Stormwater rules just went into effect for my city on July 1, 2007. Is it not appropriate for the impact of these Phase II rules be studied before adding new development and retrofit rules?

It is my understanding that there is no evidence that current nutrient loading is causing aquatic life impairment. I am recommending that DWQ be given the resources to go back, use reliable data to calibrate and validate the model and clear up all of the uncertainties associated with this rule.

Respectfully Submitted,


Jim Albright
City Council Member