

August 21, 2007

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

Subject: Jordan Lake Rules

Dear Mr. Gannon:

I am presenting my comments today in opposition to the proposed Jordan Lake Rules. As a former Mayor of 10 years with the City of Graham, I was greatly disturbed when I learned of the requirements associated with these proposed rules. I was mayor during the early stages of the development of this rule and I am familiar with the issue of the "chlorophyll *a* data" that was used as the foundation of this rule. It is evident that this left the Division of Water Quality with a very limited amount of usable data to input into a greater than four hundred thousand dollar model that the City of Graham helped to fund.

These proposed rules are the most extreme watershed rules in North Carolina and possibly the most stringent in the United States. I understand that the Division of Water Quality does not have the time or financial resources to collect additional "reliable" information and run the model again, yet the proposed rule mandates a billion dollar expenditure to local governments and provides no financial resources for assistance in implementation and compliance. Additionally, this rule provides no assurance of benefits or improvements to water quality in Jordan Lake from the Haw River sub-watershed as a result of compliance with the proposed rule.

Implementation of this rule may be necessary in areas that have contributed to impairment in certain parts of the lake. Due to the very limited mixing in the lake of the Haw River arm and the New Hope arm, I do not believe it is necessary to apply these rules to the communities located in the Haw River arm of Jordan Lake. Implementation of this rule on the Haw River arm of the lake will have little to no effect on the New Hope arm.

While the city's wastewater treatment plant does not have Total Nitrogen removal, we are currently meeting the requirements of this rule. Even so, this rule will require the city to invest millions of dollars to install nitrogen removal as an "insurance policy" to guarantee compliance. From my perspective it appears that the proposed Development rules presented is a re-invention of the cities recently adopted stormwater ordinance requirements.

I am asking that you re-examine the issues and differences between the New Hope and Haw River arms of the lake, collect more "good" data, re-run the model and make sound scientific decisions that will hopefully prove to actually be beneficial to the environment, the water quality in Jordan Lake, and allow local government the opportunity to be good stewards of public funds. A better alternative to the existing proposed rule would be for the Division of Water Quality to strongly consider the development of a separate rule for the Haw River Sub-Watershed. Thank you for the opportunity to comment on these Jordan Lake Rules.

Sincerely,

A handwritten signature in cursive script that reads "Victor E. Euliss". The signature is written in dark ink and is positioned below the word "Sincerely,".

Victor Euliss