

City of Graham

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August 22, 2007

Mr. Rich Gannon
NCDENR/DWQ, Planning Section
1617 Mail Service Center
Raleigh, NC 27699-11617

Re: Jordan Lake Rules
Public Comments


Dear Mr. Gannon:

I am in opposition to the current proposed Jordan Lake Rules designation of "Critical Water Supply Watershed". This designation has the potential to impose more stringent requirements that will place the entire watershed at an economic disadvantage. The Haw River and the New Hope arm vary greatly with land use, population density and hydrodynamics.

The New Hope sub watershed is composed of a relatively small land area as compared to the Haw River sub watershed. The New Hope arm is characterized as an urban watershed with greater impervious surfaces. The Haw River sub watershed is much larger and is predominantly rural with some urbanized areas. Water from the New Hope arm of the lake has an average hydraulic retention time of 418 days. Water from the New Hope arm remains in the lake for a period of 14 months before it exits over the dam. Water from the Haw River arm of the lake has an average hydraulic retention time of five days. Water entering from the Haw River arm remains in the lake less than a week prior to exiting over the dam.

It is obvious that the Haw River Arm has a minimal impact on Jordan Lake. These significant differences between the two sub-basin characteristics clearly demonstrate the need for two separate strategies for managing nutrient loading in the lake. Considering the complexities and uncertainties of Jordan Lake I think you will agree that this should not be a "one size fits all" rule. The Division of Water Quality should consider new rules that address the two sub-basins separately and remove the "Critical Water Supply Watershed" designation from the Haw River sub watershed.

Respectfully Submitted,


Jerry Peterman
Mayor