

City of Graham

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August 22, 2007

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

Re: Jordan Lake Rule
Public Comment

Dear Mr. Gannon:

I am opposed to the Jordan Lake rules as they are currently proposed. I will be addressing the Wastewater Discharge Requirements of the rule. The Division of Water Quality did not include Nutrient removal requirements in their speculative limits associated with the City of Graham's recent 2002 Wastewater Treatment Plant upgrade, which cost the citizens of Graham 8.9 million dollars. The proposed Jordan Lake Rules will require the city to make another multi-million dollar commitment before our current debt is paid off. This will impose a significant increase to Graham's water and sewer customers.

It is widely known that the wastewater dischargers are the smallest contributors to the Nutrient issues that impact Jordan Lake. Additionally, the rules include an excess "margin of safety" and there are a number of uncertainties associated with this rule. I am requesting that instead of initiating a specific year of compliance for Point Sources located in the Haw River sub watershed, that the Division of Water Quality considers a phased implementation schedule for Total Nitrogen removal. This strategy will coincide with the Division's "Adaptive Management" approach. Special studies have been performed on the Haw River segments of the lake and there have been no exceedences of chlorophyll *a* since the monitoring began in March of 2005. This requested strategy would be sufficient on the Haw River arm of the lake. Using this phased approach would require wastewater dischargers to meet Total Nitrogen reduction requirements at their next scheduled major facility upgrade.

The City of Graham is committed to protecting our natural environment, however; the rules as they are currently proposed provide no definitive determination of improvements in water quality at Jordan Lake.

Respectfully Submitted,



Jimmy Linens
Mayor Pro-tem