

City of Graham

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

August 7, 2007
NC Division of Water Quality
1617 Mail Service Center
Raleigh, N.C. 27699-1617
Mr. Rich Gannon

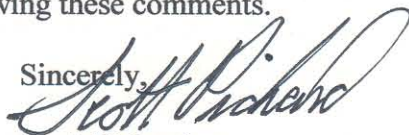
Dear Mr. Gannon:

I am submitting a response during the public comment period, for the proposed set of rules comprising the Jordan Reservoir Nutrient Strategy. I am opposed to the rules as proposed. The Cities and Towns on the Haw River Arm of Jordan Lake will be significantly affected by proposed measures proposed in the Jordan Rules. This comes when in reality the point-source dischargers contribute only 32% of the nitrogen loading and 16% of the phosphorus loading to the Jordan Lake Reservoir. The point-source dischargers have been regulated to reduce phosphorus since 1990. Non-Point sources have had little regulation toward reduction of nitrogen and phosphorus during this time. The proposed nutrient strategy does not come close to fairly allocating nutrient reduction responsibility among and between point and non-point sources. In addition Phase II Stormwater rules have only been in effect a very short period of time and this impact on nutrients is not yet known. This plan for the Jordan Lake Reservoir may be asking the taxpayers located in the municipalities of the Haw River Arm to pay approximately 1 billion dollars to comply with this strategy. This strategy comes when Non -Point Sources are 68% of the nitrogen load and 84% of the phosphorus load to the reservoir. This nutrient strategy will be more restrictive to the Haw River Arm dischargers but may not necessarily be more protective to the Jordan Lake Reservoir.

The data used to arrive at the proposed targets and incorporated into the Model is insufficient, flawed, and not reliable enough to draw sound conclusions. This especially is in reference to chlorophyll-a data and the lack of quality and quantity of data. This sparse data collected is just not sufficient to develop a strategy for the Jordan Reservoir.

In summary, I am a concerned environmentalist who is worried that the taxpayers that employ me and other environmental professionals on the Haw River Arm of Jordan Reservoir are not having their tax dollars well spent with this plan. I am for protecting the environment, but more data needs to be collected prior to implementing such a plan. Everyone wants clean water and most are willing to pay for it, but haste can waste our resources by not having a sound plan with more data. Thank you for your time in reviewing these comments.

Sincerely,



Scott Pickard
Pretreatment Coordinator