



July 23, 2007

Environmental Management Commission  
Jason Robinson  
DENR-Division of Water Quality, Planning Section  
1617 Mail Service Center  
Raleigh, NC 27699-1617

Dear Mr. Robinson:

I am writing to you to express my concern for Jordan Lake Rules that are being implemented on the Haw River Basin Watershed. I am in favor for protection of our watershed water supplies, as long as that protection is based on sound, scientific data and the measures are fair and equitable. I have reviewed the rules and the basis for implementation and find these rules to be unjustified and unfair. I therefore am against these rules for the following reasons:

- First and foremost, these rules have been formulated by using unsound information. In fact the science used is faulty with the data used from 1996 – 2000 not following protocol. In the period between 2001 to 2005, only 15 months were valid and even then only one month suggested a problem in the Haw River arm.
- These rules designate the entire area in the Jordan Lake Basin as a critical watershed area; this is contrary to other basins where the critical area is only those areas closest to the lake.
- The mandates for local municipalities to retrofit existing development will increase property taxes and other fees to cover the costs for additional Best Management Practices (BMPs). In fact DENR estimates this cost at over \$400 million in the first 5 years, with only 1 year of that for implementation of BMPs.
- The requirement for local governments to make significant upgrades to service treatment plants by 2016 is very burdensome. The estimates to accomplish this



are over \$210 million, with Greensboro's projected cost at over \$70 million. This alone could increase the tax rate for Greensboro residents by 35 cents.

- The rules requiring limits on density and double or triple storm water BMPs on new development will drive up the cost of development. Thus, virtually eliminating affordable housing from our society.

These rules are arbitrary with questionable science and will put a significant burden on municipalities that will virtually pass on to citizens and will in effect eliminate affordable housing in the region. Therefore, I respectfully request that these rules be abandoned or rewritten with factual information based on standard protocol.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Craig Smith', is written over a horizontal line.

Craig Smith, Division President  
K. Hovnanian Homes of North Carolina

CC: Marlene Sanford – TREBIC  
Lisa Martin – NCHBA  
Kay Hagan  
Alma Adams  
John Blust  
Pricey Harrison  
Maggie Jeffus

Earl Jones  
Laura Wiley  
Phil Berger  
Stan Bingham  
Katie Dorsett