



Town of Pleasant Garden
4920 Alliance Church Road
PO Box 307
Pleasant Garden, NC 27313

August 20, 2007

Division of Water Quality
Environmental Management Commission
1617 Mail Service Center
Raleigh, North Carolina 27099-1617

ATTN: Director

Subject: Opposition to the Jordan Lake Watershed Rules

After considerable research and careful consideration the Town of Pleasant Garden, at the August 14, 2007 meeting of the Town Council, unanimously passed a resolution (R52-070814) to oppose the proposed Jordan Lake Watershed Rules. A copy of the duly executed resolution is enclosed.

Please consider the Town of Pleasant Garden's opposition position on the proposed Jordan Lake Watershed Rules when considering adopting the rules without modification, as the rules would be precedent-setting for North Carolina, inequitable in their application and exorbitant in their cost.

Do not hesitate to contact me, or any other member of the Pleasant Garden Town Council, if you require additional information and/or further clarification of our position on this issue. Thank you in advance for your consideration of our request.

With Warmest Regards,

Rick Wallace
Mayor

Enclosure



RESOLUTION NUMBER FIFTY-TWO
R52-070814

RESOLUTION OPPOSING THE JORDAN LAKE WATERSHED RULES

WHEREAS, the Haw River retention time is five (5) days as opposed to the New Hope River which has a retention time of four hundred and eighteen (418) days; and

WHEREAS, the proposed Jordan Lake Watershed Rules present numerous policy, scientific, and economic problems, such as treating the Jordan Lake Watershed as a whole, disregarding the clear differences between the sub basins; and

WHEREAS, the rules call for local governments to bear seventy-five (75%) percent of the \$565 million cost of unprecedented non-point source measures, including storm water retrofits for existing development and costly nutrient reduction loads for all new development; and

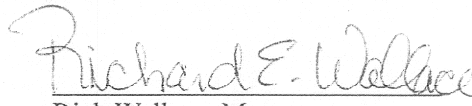
WHEREAS, nitrogen from agricultural and forestry non-point sources consists of fifty-five (55%) percent of the load flowing into the Reservoir, and phosphorus from the same sources consist of sixty-six (66%) percent of the load; and

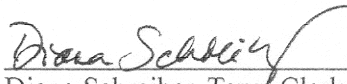
WHEREAS, substantial problems relating to data credibility have been identified and the data cited does not support the proposed point and non-point source rules; and

WHEREAS, the proposed rules, if adopted without modification by the Environmental Management Commission, would be precedent-setting for North Carolina, inequitable in their application and exorbitant in their cost.

NOW, THEREFORE, BE IT RESOLVED THE TOWN COUNCIL FOR THE TOWN OF PLEASANT GARDEN adopts this Resolution opposing the Jordan Lake Watershed Rules, and directs the Town Clerk to forward a certified copy of this Resolution to the Rules Review Commission / Environmental Management Commission by no later than September 14, 2007 on behalf of the Town of Pleasant Garden and the Town Council representing Pleasant Garden's position on the current Jordan Lake Watershed Rules.

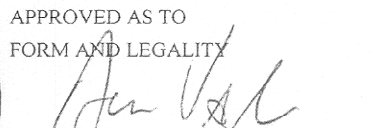
The foregoing resolution was adopted
by the Town Council of the
Town of Pleasant Garden
on August 14, 2007


Rick Wallace, Mayor


Diana Schreiber, Town Clerk



APPROVED AS TO
FORM AND LEGALITY


Don Vaughan, Town Attorney

R52-070814