

Town of Stokesdale

8416 US Highway 158
P. O. Box 465
STOKESDALE, NORTH CAROLINA 27357

Mayor Randle L. Jones
John W. Flynt
Mickie W. Halbrook
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July 9, 2007

Mr. Rich Gannon
Mr. Jason Robinson
DENR-Division of Water Quality
Planning Section
1617 Mail Service Center
Raleigh, NC 27699-1617

Dear Mr. Gannon & Mr. Robinson:

On behalf of the citizens of the Town of Stokesdale and the Stokesdale Town Council, I would like to voice our opposition to the proposed Jordan Lake rules.

The Stokesdale Town Council feels that rules to improve water quality should not place an undue financial and economic burden on our Town or the region that we are a part of. As stewards of public funds, we would like to have an assurance that monies spent will result in improved water quality.

Our opposition is based on the following:


- **Inequitable burden of responsibility:** The rules would place an undue burden on municipalities (cities and counties) for the majority of pollutant load reductions and costs of compliance through expensive technology upgrades at wastewater treatment plants, additional requirements for new development, and development or expansion of stormwater programs to address urban runoff
- **Extreme cost and questionable effectiveness of the requirement to retrofit existing development:** The unprecedented rule requirement for all previously developed areas to retrofit existing infrastructure for pollutant removal is exceedingly costly and places an undue burden on local governments. All local governments (cities and counties) in the watershed will be required to install retrofit storm water controls on existing developed lands. We urge you remove the retrofit requirement from the rules.
- **Burdensome "New Development" requirements will have a negative impact on the region's economy.** The nutrient reduction targets being utilized by the DWQ place an unrealistic burden of compliance on some areas of new development, specifically new commercial or industrial development. Developers will incur significant costs under the requirements to increase controls on pollutant loads to meet reduction goals. The requirements include limits on density and increased BMPs installation, which will drive up the cost of homes and property, increase sprawl and place our region at a significant economic disadvantage. We urge you to modify the new development pollutant reduction targets to a more realistic, achievable level.
- **Unwarranted designation of entire watershed as a critical water-supply watershed:** We question the necessity and technical validity of DWQ to classify the entire Jordan Lake watershed as a critical water-supply watershed. That designation will trigger a host of increased regulation

now and in the future that will only further limit the potential economic growth opportunity for this region. Specifically, water and wastewater treatment plant permits will be further scrutinized and any expansion requests will be far more difficult as we are approaching the limits of technology for these facilities. In addition, potential land-use density restrictions may be further regulated in the future. We believe this designation is unwarranted and the potential consequences to our region far outweigh any benefits to be gained. We urge you to remove this classification from the rule making strategy.

- **Point Sources may be the future target for additional reductions:** Numerous studies have shown that point sources represent a relatively small percentage of the basin's overall nutrient loading budget. However, the current draft rule identifies point sources as the target of both current and future requests for nutrient reductions.
- **Inaccurate cost feasibility study.** The accuracy of the fiscal analysis produced by DWQ is highly questionable in many areas and doesn't account for many true "opportunity" or lost opportunity costs in this case. Costs related to the new and existing development rules are significantly underestimated. The cost of compliance will be far greater than what DWQ estimated in the fiscal analysis currently at almost $\frac{3}{4}$ of a billion dollars.

While we must protect our water supplies, The Town of Stokesdale asks that you consider our concerns and take the appropriate action prior to the formal adoption of the rules.

Sincerely,


Randle L. Jones
Mayor