

Huisman, John

From: Jim Smith [JSmith@hagersmith.com]
Sent: Wednesday, July 21, 2010 11:11 AM
To: Huisman, John

As a resident of Raleigh who drinks the water of Falls Lake and recreates on it, I am very concerned about the pollution that has brought the lake near to ecological collapse. The sediment, nitrogen and phosphorus from wastewater treatment plants, from urban and suburban development, and from farms must be reduced and the water's quality restored. This is required by the federal Clean Water Act and state water quality laws.. This will be a big job as scientific models show we need to cut levels of nitrogen by 40% and phosphorus by 77%, measured against 2006 levels. It is important that we get started now. The rules that you are writing must be tough and effective.

I want rules that will:

1. **Clean up the entire lake.** The federal Clean Water Act and state law require that the entire lake be cleaned up – it will take a while, but the rules must be strong enough to result ultimately in full compliance with water quality standards throughout the lake.
2. **Start now and finish the job within 25 years.** We know what must be done. Every delay in beginning major reductions in discharges and polluted runoff increases future costs and postpones the final cleanup. It took less than 25 years to create the current water problem; we shouldn't pass it on to the next generation. The timeline for the rules should reach full cleanup by 2035. The costs to municipalities, taxpayers, and ratepayers for water treatment (filters, chemicals, and ultimately a water treatment plant) and for future retrofits of existing development will only increase over time if we do not bring the lake into compliance.
3. **No delays along the way.** Some stakeholders have proposed remodeling the lake partway along to determine if measures are still needed. But from the extent of current contamination, we know that any reputable science in the next two decades will only confirm that Falls Lake is in terrible shape, and needs dramatic pollution reductions to regain its health.
4. **Keep stormwater on site by restoring natural hydrology.** Current efforts to manage stormwater runoff through engineered structural controls, like big detention basins are not keeping water bodies clean. Soil scientists and architects are realizing that the best way to prevent polluted runoff is to make developed sites mimic the way they managed rainwater before development. One way to restore natural hydrology is by employing Low Impact Development (LID) practices to keep stormwater on site, rather than flowing into streams. In the Falls Lake watershed, where the soils are especially susceptible to erosion, shifting new and existing development towards original hydrology is one key to restoring lake health.

Thanks for your consideration of my comments.

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