

To: John Huisman, NC DWQ
RE: Comments Falls Lake Rules
From: Salvatore Corbo, L.G
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Falls Lake pollution has reached levels that violate the Clean Water Act. The establishment of rules or public policy regarding stewardship of our drinking water supply should not be a negotiation with polluters. However, the process will be encumbered by the wishes of stakeholders.

Regarding Falls Lake – including the proposed DWQ guidelines and stakeholders’ comments. What I would like to share here are some global concepts I have learned in my work and observations regarding environmental policy. I hope these insights help you stick to your guns regarding the future of our drinking water supply.

From Stakeholder interests:

“Problem is legacy based therefore we are all responsible”

- This argument is typical of our social system – Much of the cost of business enterprise is passed on to society to pay. The environmental cost of doing business is avoided by those profiting from the enterprise.
 - An environmental policy that allows developers to exchange favors to public officials for the right to develop within the watershed cannot be tolerated.

“Balance land owner rights with protection and restoration of water quality”

- Landowners within the Falls Lake Watershed have the ultimate responsibility for protection of the lake and the hydrogeological system that maintains the lake. This includes rain-water runoff, and the water that permeates the soils, joins the water table and flows as groundwater to the lake. We cannot tolerate manipulation of hydrological terms and regulatory practice that circumvent the natural dynamics of the lake system (as has taken place in the eastern part of NC).
- Self-monitoring by the development community is a myth and a mistake.
- It is obvious that development and resulting activities within the watershed has already bypassed the limit of water-quality sustainability. Management of the watershed must put the brakes on further development until the current problem is understood and fixed.
- Any nutrient management strategy must be centered on restoration of a natural environment, rather than the convenience of the property owners..
- Developers and certain landowners will use enticements such as “jobs”, “tax base”, and arguments for “reasonable and achievable strategies”, or a “fair and equitable strategy” for their own short-term agenda and leave the true costs to the communities to clean up.

“Land Use”

- Equating agricultural land use with natural environments is a fallacy. Management of existing agricultural land within the watershed has to involve strict practices of nutrient control, reversal of standard agricultural exclusions involving UST regulations, chemical storage. Feedlots involving swine are especially polluting of the groundwater that feeds the lake. I hope there are not any lagoons, spray fields associated with the watershed.
- Growth and development will not protect the lake; we have already overshot this point.

Pollution:

The testing for nutrients testing and their regulation are just the tip of the iceberg of pollutants that are in the lake.

It is necessary to determine the groundwater contribution to lake volume, as opposed to runoff. Pollutants travel with groundwater for great distances. Development and agriculture have been allowed to occur in close proximity to the lake. A handle on nutrient loading from groundwater is necessary.

It is time to get real.

understanding