



BUSINESS ALLIANCE

FOR A SOUND ECONOMY

July 28, 2010

Division of Marine Fisheries
Morehead City Central District Office
5285 Hwy 70 West
Morehead City, NC 28557

Re: 2010 Coastal Habitat Protection Plan Update

Dear Mrs. Deaton:

The Business Alliance for a Sound Economy (BASE) is an organization of trade associations formed to take collaborative action on issues of concern to their broad membership engaged in residential and commercial real estate sales, land development, economic development, finance, property management and leasing. BASE represents the approximately 12,000 members of the Brunswick County Home Builders Association, the Brunswick County Landowners Association, the Topsail Island Association of REALTORS®, the Pitt County Economic Development Partnership and the Wilmington-Cape Fear Home Builders Association.

BASE formally submits the following comments in response to the 2010 CHPP update.

BASE recognizes the value of our coastal resources; it is why we choose to raise our families here and it is what inspires others to do the same. Water quality and those activities enjoyed within our coastal waters bring millions of dollars a year to North Carolina. Home building and home sales are driven by the new citizens that have chosen to call coastal North Carolina home. Both depend on the resources and services provided within our coastal towns, and our industries agree the appropriate measures for addressing water quality preservation and habitat protection must be placed in the highest priority. BASE is vitally concerned with and has consistently supported environmental regulations to protect natural habitat that are scientifically-based, logical and fairly implemented.

As stated, the purpose of the CHHPP is to compile the latest scientific information on each habitat so that management needs can be identified to protect, enhance and restore associated fish populations. The plan is organized by six fish habitat categories – water column, shell bottom, submerged aquatic vegetation, wetlands, soft bottom and hard bottom. Each habitat chapter includes information on the distribution, ecological function, status and trends, and threats to those habitats; and management needs to address the threats.

Coastal Stormwater Program – Non-Point Source Pollution Contributing Factors

As it is noted one of the most significant accomplishments that is one way or another listed in literally each habitat area was the eventual adoption of the revised 2008 coastal stormwater rules. The rules as adopted requires reduced built-upon area next to SA water and ORW's from 25 to 12% to further reduce run-off from new development, and expand the stormwater control methods that can be used. In light of this perceived accomplishment it is interesting to note that

in the CHPP update there is not a thorough discussion on the cumulative impacts of existing development; more importantly on on-site waste water septic systems. BASE would argue that if the CHPP is to be an all encompassing document that supports and identifies the management needs to protect, enhance, and restore the state's fisheries then certainly more analysis and management criteria is needed to document failing septic systems and their affects on our coastal environment. This is truly a missing piece of the puzzle that seems to once again fall to the wayside. It is interesting that the CHHP update elegantly illustrates the relationship between the regulated development community and our affects on the environment, but fails to draw any distinctions or conclusions towards creating rational policies to attempt to remedy failing on-site waste water systems.

Essential funding should be allocated for enforcement

It would seem that the complete undertone of the CHPP update is that in all actuality more monitoring, education, and enforcement of current rules and regulations that encompass the diverse coastal programs need to take place first and foremost. This is noted numerous times throughout, and certainly seems to take precedent in the document. Unification of existing Rules and the enforcement of them should be the first, best step toward positive environmental impacts.

In conclusion, BASE recognizes the value of our coastal resources, and supports initiatives for the preservation and protection of coastal waters and coastal habitats. Again, we thank you for this opportunity to provide input regarding the draft Coastal Habitat Protection Plan and look forward to participating in the process as it continues to move forward. Should you have any questions about these comments please feel free to give us a call at (910)799-2611.

Sincerely



Craig Stevens
Chairman