



August 8, 2012

Mr. Chuck Wakild
Director
NC Division of Water Quality
1601 Mail Service Center
Raleigh, N.C. 27699-1601

Subject: Category 4b Demonstration as an alternative management approach to the draft impervious cover limitation TMDL for Little Alamance Creek

Dear Mr. Wakild:

The City of Burlington has been investigating pursuing a Category 4b Demonstration for Little Alamance Creek since our December 2, 2011 letter to former NC DWQ Director Coleen Sullins. While the City still has reservations about the appropriateness about TMDLs that use impervious cover as a surrogate for water quality, our investigation has led us to committing to developing a Category 4b Program.

NC DWQ established a deadline for the stakeholders in Little Alamance Creek to commit to the 4b demonstration was established in order to allow the municipalities to budget effectively for program creation. As such the City of Burlington has funds in its current budget to begin development of the Category 4b Program. In keeping with former NC DWQ guidance, specifically the City's original draft NPDES Stormwater Permit about impaired/TMDL waters, the City plans to develop its Category 4b program over the next 24 months from the acceptance of this letter by NC DWQ. Once the program is created the City will submit it to NC DWQ for approval.

We look forward to working with DWQ staff on this important initiative to begin the process of restoring the biological integrity of Little Alamance Creek. If you or your staff have any questions or need any additional information please contact our Stormwater Administrator, Michael Layne, P.E. at (336) 222-5140 or via email at mlayne@ci.burlington.nc.us.

Connecting the Triad and the Triangle
425 South Lexington Avenue ~PO Box 1358~Burlington, NC 27216
(336)222-5000 business
www.BurlingtonNC.gov

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Harold Owen", written in a cursive style.

Harold Owen, City Manager

Cc: Josh Johnson, P.E. Alley, Williams, Carmen, and King
Michael Layne, P.E. City of Burlington
Andy McDaniel, P.E. NCDOT
Chris Rollins, City Manager City of Graham
Kathy Stecker, NC DWQ Planning Section
Mike Randall, NC DWQ Surface Water Protection Section

City of Graham

P. O. Drawer 357
201 South Main Street
Graham, North Carolina 27253
Tel: (336) 570-6700 / Fax: (336) 570-6703

July 24, 2012

Mr. Chuck Wakild
Director
NC Division of Water Quality
1601 Mail Service Center
Raleigh, N.C. 27699-1601

Subject: Category 4b Demonstration as an alternative management approach to the draft
impervious cover limitation TMDL for Little Alamance Creek

Dear Mr. Wakild:

The City of Graham has investigated pursuing a Category 4b Demonstration for Little Alamance Creek since my November 30, 2011 letter to former NC DWQ Director Coleen Sullins. While the City still has reservations about the appropriateness of TMDLs that use impervious cover as a surrogate for water quality, our investigation has led us to commit to developing a Category 4b Program.

The July 2012 deadline in the original letter for the stakeholders in Little Alamance Creek to commit to the 4b demonstration was established to allow the municipalities to budget effectively for program creation. As such the City of Graham has funds in its current budget to begin development of the Category 4b Program and plans to begin development this month. In keeping with former NC DWQ guidance, specifically the City's original draft NPDES Stormwater Permit about impaired/TMDL waters, the City plans to develop its Category 4b program over the next 24 months from the acceptance of this letter by NC DWQ. Once the program is created the City will submit it to NC DWQ for approval.

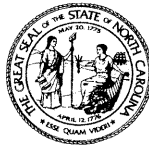
We look forward to working with DWQ staff on this important initiative to begin the process of restoring the biological integrity of Little Alamance Creek. If you or your staff have any questions or need any additional information please contact our stormwater engineer, Josh Johnson, P.E. at (336) 226-5534 or through email at josh@awck.com.

Respectfully Submitted,



Chris Rollins, City Manager

Cc: Josh Johnson, P.E. Alley, Williams, Carmen, and King
Michael Layne, P.E. City of Burlington
Andy McDaniel, P.E. NCDOT
Kathy Stecker, NC DWQ Planning Section
Mike Randall, NC DWQ Surface Water Protection Section



STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

BEVERLY EAVES PERDUE
GOVERNOR

EUGENE A. CONTI, JR.
SECRETARY

July 27, 2012

Mr. Chuck Waklid
Director
NC Division of Water Quality
1601 Mail Service Center
Raleigh, N.C. 27699-1601

Subject: Category 4b Demonstration as an alternative management approach to the draft impervious cover limitation TMDL for Little Alamance Creek

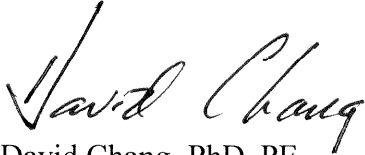
Dear Mr. Waklid:

On October 21, 2011 the NCDOT participated in a meeting to discuss alternative management approaches to restoring the biological integrity of Little Alamance Creek in the Cape Fear River basin. The meeting was attended by representatives from DWQ's Modeling & TMDL Unit, the Stormwater Permitting Unit, along with several local government staff persons from across the state. As a follow-up to this meeting, on November 22, 2011 I sent former Director Coleen Sullins a letter describing NCDOT's commitment to further investigate the feasibility of preparing a Category 4b Demonstration as an alternative to the draft impervious cover limitation TMDL, and as a framework for achieving our common goal of restoring water quality standards in Little Alamance Creek. In this letter NCDOT committed to work with its project partners at DWQ and the cities of Burlington and Graham to reach a final decision on pursuing a Category 4b Demonstration by July 2012.

Upon further investigation of the Category 4b process and in consultation with representatives of Burlington and Graham, NCDOT believes a Category 4b Demonstration is a viable alternative management approach to the draft impervious cover limitation TMDL for Little Alamance Creek. As such, NCDOT commits to a cooperative working partnership with Burlington and Graham to prepare a joint Category 4b Plan designed to restore the biological integrity of Little Alamance Creek. NCDOT and its municipal partners will submit the Plan to DWQ for your review and approval within a time period no longer than twenty four (24) months after receiving written notice-to-proceed from your office.

We look forward to working with DWQ staff and our municipal partners to begin the process of restoring the aquatic life support uses of Little Alamance Creek. We hope you concur with our findings that a Category 4b Demonstration is indeed a viable alternative to an impervious cover limitation TMDL and we look forward to receiving your letter of notice-to-proceed so we can begin this important project. If you or your staff have any questions or need any additional information please contact Andy McDaniel, PE of my staff at (919) 707-6737 or through email at amcdaniel@ncdot.gov.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "David Chang". The signature is fluid and cursive, with the first name "David" and last name "Chang" clearly distinguishable.

David Chang, PhD, PE
State Hydraulics Engineer
Hydraulics Unit
NC Department of Transportation

cc: Kathy Stecker (DWQ)
Mike Randall (DWQ)
Mike Mills, PE (NCDOT)
Jerry Parker (NCDOT)
Don Lee, CPESC (NCDOT)
Ken Pace, PE (NCDOT)
Andy McDaniel, PE (NCDOT)
Harold Owen (City of Burlington)
Michael Layne, PE (City of Burlington)
Chris Rollins (City of Graham)
Josh Johnson, PE (Alley, Williams, Carmen, and King)