



January 07, 2019

Mr. J. D. Solomon, Chairman  
N. C. Environmental Management Commission  
NCDEQ – Division of Water Resources  
1617 Mail Service Center  
Raleigh, N.C. 27699 - 1617

**RE: FISCAL NOTE FOR PROPOSED NUTRIENT RULES**

Mr. Solomon:

I am writing this letter as Manager of the Town of La Grange and a member of the Neuse River Compliance Association (NRCA). On behalf of the Town I am submitting the following comments on the recently published fiscal note for the above rules:

- The Town has been actively searching for additional nitrogen allocation from other point source (NRCA member and others who are not members) for more than 3 years and have not found anyone willing to sell (permanent transfer) any allocation to the Town. We are aware that 1,000 pounds of nitrogen was sold this summer by a non-NRCA member; however there were three permit holders seeking to purchase that nitrogen allocation and we were not successful in purchasing that allocation.
- The Town has been at 100% of its nitrogen for 3 of the past 4 years, requiring us to lease allocation from other NRCA members.
- As a result of the Town's inability to acquire additional allocation on a permanent basis, it is basically under a growth moratorium unless we are able to acquire an additional nitrogen allocation cost effectively.

As the Commission deliberates this matter please be aware that, after 20 years, the nitrogen allocations have reached an impasse for many smaller facilities in the Neuse River Basin.

Mr. J. D. Solomon  
Page 2.  
January 07, 2019

Thank you for your time and consideration in this very important matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Craft". The signature is written in a cursive style with a large initial "J" and "C".

John Craft  
Town Manager

CC: Neuse River Compliance Association