

**Subject:** FEIS Comments #2

**From:** NCDeerHunter29@aol.com

**Date:** Fri, 5 Feb 2010 16:32:47 EST

**To:** Henry.M.Wicker.JR@saw02.usace.army.mil

**CC:** commissioners@co.wake.nc.us, council@townofcary.org, allcouncil@apexnc.org, dick.sears@hollyspringsnc.us, james.cobb@hollyspringsnc.us, tim.sack@hollyspringsnc.us, Chet.VanFossen@hollyspringsnc.us, linda.hunt.williams@hollyspringsnc.us, Parish.Womble@hollyspringsnc.us, jholcombe@townofmorrisville.org, pmartin@townofmorrisville.org, llyons@townofmorrisville.org, sdiehl@townofmorrisville.org, ljohnson@townofmorrisville.org, mbroadwell@townofmorrisville.org, tmurry@townofmorrisville.org, rlk@mindspring.com

U.S. Army Corps of Engineers, Wilmington District

Regulatory Division

Attn: File Number 2005-20159

69 Darlington Avenue

Wilmington, NC 28403



Email address: [Henry.M.Wicker.Jr@usace.army.mil](mailto:Henry.M.Wicker.Jr@usace.army.mil)

Dear Mr. Wicker,

I am writing in reference to the Final Environmental Impact Statement (FEIS) for the Western Wake Regional Waste Water Treatment Facility.

Two arguments I have heard from the Western Wake Partners (WWP) regarding moving their preferred site (Site 14 - the wrong site) to one of the three alternative sites is that it would cost more money and time.

Every time I have asked for a detailed financial analysis (bottoms up) showing the cost differences between Site 14 and alternative sites, all I've received is either a gross figure or a few summary lines of cost that attempt to support their claim. They never offset these summary costs with cost avoidance figures.

For example, if the site was located on one of the 2 alternative Progress Energy (PE) sites, there would be cost savings related to:

- shorter effluent lines from Holly Springs
- one less core drilling under both US 1 and the New Hill railroad bed
- discharging to Harris Lake would save 7 miles of effluent piping and a pump station saving millions of dollars and environmental impacts
- Site 14 could be sold to a developer or Wake County School Board at a huge profit further reducing costs
- using one of the alternative sites on PE property would require less than 100 acres versus the 211 acres on Site 14. This is less half the acreage!
- delays to-date have already cost the WWP almost 1/3 increase in cost (\$100M) with more cost increases as delays continue.

As for time delays, where is the supporting details? A site plan was required for each of the alternative sites so it should not make any difference which site is built on. If additional work has been done for Site 14 and not for the alternative

sites, why? The project has not been approved so why was any additional work done?

At a January 30, 2009 WWP Policy Advisory Committee (PAC) meeting held at Morrisville Town Hall, Cary's Steve Brown told US Representative David Price that an alternative site would add less than a year to the project. The project is already more than three and a half years behind schedule with hopes of making up time by expediting tasks. Even if a slight time delay were true, much of the time required to move to an alternative site could be absorbed.

Based on these facts, the NEPA FEIS is incomplete, inaccurate, and adequate. At a minimum Site 14 must be rejected as it is the WRONG site and replaced with one of the alternatives already deemed acceptable by USACE.

Sincerely,

Paul Barth  
2108 New Hill Olive Chapel Rd  
New Hill, NC 27562