

Subject: FEIS Comment #5

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

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Email address: 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.

In a App_A13_Addl_comments.pdf, a letter from Steve Brown, Director of Public Works and Utilities, dated June 26, 2008 is included. Mr. Brown's letter is in response to a letter I had sent to Henry Wicket, Project Manager, US Army Corps of Engineers, dated January 18, 2008. My comments are related to Mr. Brown's response.

First off, why did it take six months for Mr. Brown to write my letter? Why did Mr. Wicker not require a response in a timely manner? The issues discussed were of significant importance and applicable to the USACE PDT purpose.

Key comments made by Mr. Brown in his letter and my responses to those comments are:

Brown: "The SCWF (South Cary Wastewater Reclamation Facility) was placed in service in 1988. At the time it was a remote rural area with very few people nearby neighbors."

Barth: Exactly New Hill's point. Cary built a sewage plant where very few people lived. Now WWP wants to drop a sewage plant right into the center of a community where people have lived for more than a century. The surrounding residents are also primarily minorities with limited means to fight such a facility. The sewage plant should be built away from an existing populated area such as one of the two alternatives sites on Progress Energy property. There would be very few nearby neighbors.

Brown: "In late 2004 families began moving into new homes that had been built on the adjoining property along the northern boundary. At this writing, there are about 300 new homes occupied within half mile of the SCWRF property. Some of the homes are very close to the treatment facilities..."

Barth: Exactly New Hill's point. Once homes were built adjoining or near the SCWRF, all hell broke loose. Years of complaints followed regarding odor, noise, light, traffic problems that went unsolved even spending huge amounts of dollars to attempting to correct. Cary already knows what types of issues a sewage plant will cause surrounding residents but the WWP and FEIS won't acknowledge the same fact in New Hill's case. While residents near the SCWRF were "assured" that living near a sewage plant would not be a problem, the facts speak for themselves. Besides, the residents knew that they were buying a home next to a sewage plant and did so of their own free will. New Hill residents don't have the same freedom of choice. The sewage plant is being forced down our throats.

Brown: "Also, the prevailing wind is from the southwest, and any odors that escape the SCWRF site are most likely to be carried directly to these homes."

Barth: Exactly New Hill's point. Our prevailing winds (like all of Wake County) are from the southwest. As Mr. Brown stated, "any odors that escape" ... will travel all across New Hill. He basically admits that odors will come from a sewage plant. Another alarming fact is that one of the options for treating biosolids is to incinerate them. The toxic pollution from this process will be not only drift over New Hill but all of the nearby towns in Wake County causing extreme health risks.

Brown: "After receiving odor complaints from the first residents of these new homes, we hired a consulting engineer..."

Barth: Exactly New Hill's point. When, not if, New Hill experiences odor problems, the FEIS still does not define how any problems will be addressed. Since New Hill is not part of any of the WWP townships and therefore can't vote out town elected officials, any problems we experience will be ignored. No consulting engineer, no fix defined, no resolution will be taken to resolve any sewage plant problem.

Brown: he continues to describe the many years (late 2004 thru June 2008) of history and tried fixes that failed.

Barth: Exactly New Hill's point. Is this what New Hill has to look forward to? Years of tried and failed fixes – if any fixes are attempted at all?

Brown: "The Town of Cary is committed to being a good neighbor and to protecting and enhancing the quality of life of our citizens."

Barth: Exactly New Hill's point. Cary is committed to Cary citizens, not New Hill citizens.

Brown: "We believe that our efforts to date have been successful in limiting the affected area, but clearly more work remains."

Barth: Exactly New Hill's point. Even with more than 3 years of effort to resolve the problems with the SCWRF, problems remain. And this is when a town cares about its citizen's! This is what happens when a sewage plant is placed in the midst of an existing community instead of on property where very few or no residents reside.

Brown: "An unanticipated outcome of the community meetings" (residents surrounding SCWRF) "was that we discovered noise and plant lighting also bothered some nearby residents."

Barth: Exactly New Hill's point. Noise and lighting issues had previously been reported to Cary but it wasn't until the residents banded together to demand a meeting with Cary officials did their concerns get noticed. Would New Hill residents be afforded the same courtesy? Since we are not citizens or voters in any of WWP towns, I doubt it. Why? Because we have asked for a "problem reporting process" to be included in the SEPA Draft EIS, NEPA Draft EIS and now the NEPA Final EIS and I still don't see one described.

Brown: "We know that odors from the SCWRF are unpleasant and prevent some of our neighbors from fully enjoying their homes and yards with friends and family."

Barth: Exactly New Hill's point. Need I say more!

Brown: "...we still acknowledge that the off-site conditions can be unpleasant and even offensive at times,..." "It can be unsettling to be surrounded by unpleasant odors. In some cases, residual traces of the odor can linger in your sinuses for a while after exposure."

Barth: Exactly New Hill's point. I can't make this stuff up. Need I say more!

Brown: "The average sale price of these houses through 2007 was around \$395,000. In 2008, sales have been very slow. The few houses sold in 2008 have sold for slightly below this average."

Barth: Exactly New Hill's point. While it is true that the economy has slacked, Cary often brags about how Cary has successfully weathered the economic storm but now want to use this same downturn to shield them from the reality of home values being impacted due to SCWRF. Mr. Brown wants you to believe it is the ONLY reason for decreases in home values. The residents surrounding SCWRF feel otherwise. They have stated in public that either they can't sell their home due to the sewage plant being located next door or that sellers had to significantly reduce the price of their home in order for it to sell.

Brown: "Rather they illustrate how we have wrestled with a trend that is very prevalent in our industry: increasing urbanization around facilities that were once located in isolated rural areas."

Barth: Exactly New Hill's point. We are not an urban area that needs these facilities. We don't want to accept and suffer the problems associated with a sewage plant that benefits another town's urban sprawl agenda. We are a rural area that wants to stay that way; a destination point for city folks to get away from it all. This proposed sewage plant is not being located in a rural area away from a majority of the residents. New Hill is not a place where development will build up to the sewage plant and folks making a choice to build a home next to it. It is placing a sewage plant in the center of an established community older than any of the WWP town's.

Brown: "The WWRWRF is a new facility designed with the state-of- the-art technology and features..."

Barth: Exactly New Hill's point. All facilities when originally designed and built are "state-of-the-art" facilities and yet there are odor, noise, light, etc. problems with them. No facility is perfect and as time wears away at the "new facility" it becomes old, worn down, and outdated. When problems occur, it is best to have sewage plants located away from the center of an established community. A much better option is to locate the sewage plant on one of the Progress Energy alternative sites (Site 19 or Site 21/23).

Brown: "As conditions change in the future, new odor control strategies and newer technology will be provided to enhance odor control at the WWRWRF."

Barth: Exactly New Hill's point. As just mentioned, and confirmed by Mr. Brown, conditions will change in the future. New odor control strategies and newer technology will be required as the plant ages. State-of-the-art is not forever as seen with computers. Problems will occur and New Hill will be the victim, not any of the WWP town's residents that will be creating the sewage. An exception would be the toxic plume if biosolid incineration is implemented. Then WWP residents will be affected by their own biosolids along with New Hill residents. How ironic is that.

Brown: "This study quantified noise sources and compared them to background noise levels at various times of the day and night." "HUD recommends less than or equal to 55dB in suburban communities but finds that less than or equal to 65dB is acceptable."

Barth: Exactly New Hill's point. So WWP will design to noise levels normally experienced in a suburban community. But New Hill is a rural community. 65dB will not be acceptable to New Hill residents. Nor will its frequency or character. Our daytime noise level is very low so any industrialized noise will be aggravating. Our nighttime is extremely low. Probably could hear a pin drop so any industrialized noise will be intolerable to our predominately minority community that lives closest to the sewage plant.