

Subject: Response to Western Wake Partners FEIS

From: <tforbes2@nc.rr.com>

Date: Mon, 8 Feb 2010 5:15:44 -0500

To: Henry.M.Wicker.Jr@usace.army.mil

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February 8, 2010

Mr. Henry M. Wicker, Jr
U.S. Army Corps of Engineers, Wilmington District Regulatory Division
Attn: File Number 2005-20159
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Wilmington, NC 28403

Email address: Henry.M.Wicker.Jr@usace.army.mil

Dear Mr. Wicker:

I am writing in reference to the Western Wake Regional Waste Water Treatment Facility. While I believe there are many inconsistencies and flaws in the EIS, I will limit my comments to the noise impacts of the proposed project.

The report notes that the benchmark for night time noise in a rural area is 30 dBA. (Section 3, Table 3-20).

The EIS states noise around the sewage plant will comply with Town of Cary's noise ordinance of 60dBA during the day and of 50 dBA during nighttime. This is an unacceptable increase in the level of nighttime noise.

In addition, it is later noted that "The Partners will comply with the Town of Apex noise ordinance which allows a maximum noise of 60 dBA during the daytime (7:00 AM to 10:00 PM) and 55 dBA during the nighttime." (Section 4, lines 1359 - 1361) Not only is this an additional 5dBA increase in nighttime noise, it is a glaring inconsistency and highlights the ongoing difficulty New Hill residents will have in determining which ordinances will be applied and which town is responsible.

In their own report, the Partners have demonstrated that there is and will continue to be unclear responsibility and authority. New Hill residents cannot determine from this report either what the nighttime levels of noise are expected to be or who to contact if there is a problem.

Section 3, Lines 1184 - 1188 states: "Noises generated at the WCPS are kept at non-intrusive levels using sound-attenuated enclosures for equipment and dB-rated equipment. Noise complies with the Town of Cary's noise ordinance (60 dBA during daytime hours; 50 dBA during nighttime). During power outages, the stand-by power generator at the WCPS increases noise levels, but these events occur infrequently and are of short duration."

This statement is disingenuous, as it gives the impression that noise will be a problem only during power outages. In fact, during peak shaving, there will be increased noise as well. In Section 4 (Lines 1338 - 1339), it is noted that "The combination of testing and peak-shaving would occur a total of 7 to 8 times per month." Therefore, New Hill residents can expect increased noise twice a week--not just during power outages, as the report seems to indicate.

Lines 1340-1346 state, " The Partners are committed to work with the neighbors surrounding the WRF site. The Partners have found that noise character can also impact neighbors." I submit that in this very report, the Partners have shown, once again, their lack of regard for the citizens of New Hill. The Partners acknowledge that noise is a known problem, yet fail to provide accurate information about the expected impacts from this project.

Finally, while impacts from increased traffic are addressed in the report, no mention is made of increased noise resulting from traffic. I find it difficult to believe that there will be no effect on noise due to truck traffic.

It is certainly worth noting that if this facility were located on any of the sites on Progress Energy land, impacts from noise would be negligible, if not non-existent.

The Final EIS should be rejected. A new site selection process should be conducted with transparency and with the input of New Hill residents.

Thank you for your consideration.

Tonya Forbes
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