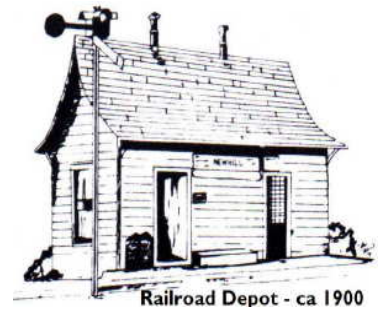


PO Box 68  
New Hill, NC 27562  
NewHillCA.org

New Hill Community Association, Inc.

October 9, 2006

Daniel M. Blaisdell, P. E.  
Assistant Chief, Engineering Branch  
Construction Grants and Loans Section  
North Carolina Division of Water Quality  
1633 Mail Service Center  
Raleigh, NC 27699-1633



Dear Mr. Blaisdell,

Members of our New Hill Community Association, Inc. have reviewed the document submitted by the Western Wake Partners (WWP) in preliminary response to NCDWQ's July 27, 2006 letter requesting WWP further address several recommendations made by the NCDENR Hearing Officer's Report dated July 20, 2006.

After reviewing the WWP document we believe their responses to still be inaccurate, incomplete and inadequate. Our Attachment provides details on each comment response.

Paul Barth  
President, New Hill Community Association, Inc.

cc: Mr. Larry Horton  
Ms. Melba McGee

## ATTACHMENT

### Site Selection Process

#### **Comment 1 Response:**

All additional information requested by DENR was not provided.

- Inadequate discussion and corrections of calculation errors regarding service factors, weighting factors, and cost analysis in Table 1
- Site 14 in Table 1 should be rated as a "5" (Historic District, rest homes, playgrounds, Cemeteries, etc.) as far as adjacent land use is concerned
- Need specifics on what is included under "Other/Misc." category in Table 1
- Holly Springs is still part of Service Area - effluent wastewater is being processed
- Progress Energy (PE) land not adequately discussed and should be ranked even more favorably than currently ranked

#### **Comment 2 Response:**

Statistics related to minority/low income population still does not accurately reflect area immediately surrounding sewage plant. WWP did not follow DENR directions.

- We do agree with data provided for Census Block 1053 which shows 87% minority in the immediate vicinity of the sewage plant
- Remaining population statistics have been manipulated in the various Tables to show only 38% minority
- Shouldn't have used entire census blocks just because a little of the census block is in Area 1 or Area 2
- Income data wasn't easily available so WWP didn't do what was requested
- WWP included Holly Springs demographics although WWP says Holly Springs is not part of Service Area

#### **Comment 3 Response:**

Insufficient explanation related to PE property.

- Should have looked at who owned property being evaluated
- PE land already taken from New Hill residents and being used for utility purposes versus private landowners who had a small farm
- PE land has 1000s of acres of buffer which would not as adversely impact the New Hill Community
- WWP had knowledge, if not information, on PE plans to develop 25,000 acres of their Shearon Harris New Hill property. References: Meeting Summary Memorandum dated January 13, 2005 attended by Tom Trocheck (PE), Mary Clayton (PE), Kim Fisher (Cary), Tim Bailey (Cary), Tommy Esqueda (CDM), and Kelly Boone (CDM) and email dated January 18, 2005 from Tommy Esqueda to Kim Fisher and Tim Bailey

### Environmental Impacts

#### **Comment 1 Response:**

Apex's SCIMMP does not include New Hill. Apex only states that New Hill is part of its planning area which means New Hill is in Apex's Long Range Urban Service Area (LRUSA).

We are being asked to look at three (3) different governing bodies (Apex, Holly Springs, and Wake

County) for mitigation of secondary and cumulative impacts. The issue of which body is responsible is not clear. Citizens of New Hill should know up front who responsible party is.

All relevant issues are not addressed in any of the SCIMMP plans. The increased capacity to treat sewage will lead to growth. Secondary and cumulative results of growth that should be addressed are:

- a. Loss of open space
- b. Increased run-off from construction – this will threaten our water supply (e.g. well water, ponds, creeks, and wetlands)
- c. Increased traffic on rural roads not designed for heavy traffic
- d. Loss of small farms due to increased zoning restrictions and tax burdens

Attachment B – What has WWP (Cary) attained relative to their “goal” of 99.9% effective control of odor?

### **Influent and Effluent Pipeline**

#### **Comment 1 Response:**

Inspection criteria that suffice in a municipality with municipality water supply are not sufficient for a rural community.

- There are no plans for the handling of spills in a rural setting. New Hill has ponds, creeks/streams, and wells that support our farm land (agriculture, livestock, tree farms, etc.)
- There are no details on how WWP will access the pipeline for inspection
- Did not address impact to wells and ponds

Performance bond or insurance must be established to protect New Hill residents from the effects of a spill.

Must implement a schedule for frequent testing of New Hill water sources for contaminants in vicinity of all influent pipelines and sewage plant.

### **Public Input**

#### **Comment 1 Response:**

WWP did not comply with DENR’s strong recommendation to sponsor a public hearing.

- WWP should conduct a public hearing before writing a response to DENR issues/concerns
- A “Citizens Advisory Committee” should be established to ensure community participation and involvement in this project. This is similar to what Wake County Commissioners and Town of Holly Springs is implementing for the Holly Springs landfill project

### **Issues/Concerns Not Addressed**

1. Site Selection response was a repeat of what is contained in original Draft EIS. This was confirmed by Tommy Esqueda at Apex Town Council meeting on September 19, 2006
2. Incomplete response regarding environmental issues and not including data related to all original 12 sites plus Site 30
3. Limited official governmental representation
4. No public outreach to residents around the preferred New Hill site and influent pipelines.

WWP only want to discuss EIS process – not meaningful negotiations

5. Further evaluation of PE land availability to host sewage plant despite the reasoning that because Holly Springs will not send influent to the sewage plant, all sites South and East of US 1 were not considered
6. Numerous calculation errors in the total weighted scores of the (12) sites
7. Potential impacts to property adjacent to the sewage plant and along the pipeline footprint
8. NC Department of Cultural Resources issues defined in letter dated July 21, 2006 to Monte Matthews (Army Corps of Engineers)