



North Carolina Department of Cultural Resources
State Historic Preservation Office
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 Lisbeth C. Evans, Secretary
 Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
 Division of Historical Resources
 David Brook, Director

June 10, 2005

MEMORANDUM

To: Dan Blaisdell, Assistant Chief
 Construction Grants & Loans
 Division of Water Quality, DENR

From: Peter Sandbeck *Peter Sandbeck*

Re: Western Wake Water Reclamation Facility, New Hill, Wake County, CH04-3147

This memorandum is to follow up on the several conversations that our Environmental Review Coordinator Renee Gledhill-Earley has had with Hannah Stallings, and with Larry Horton and you concerning the proposed Western Wake Water Reclamation Facility (WRF) near US 1 in New Hill.

We received our first notification of the proposed project from the State Clearinghouse in December 2004 as a scoping document for a draft Environmental Impact Statement (EIS). Based on the lack of specific information in the scoping request, we provided comments on January 12, 2005, which requested a map and other information concerning the project. We had no response to that request until last week when the project consultants, at the direction of Hannah Stallings, emailed us a map showing the location of the proposed WRF. The map shows the facility as immediately adjacent to the New Hill Historic District, a property listed in the National Register of Historic Places in April 2001.

From our conversations with Construction Grants and Loans, we understand that the proposed undertaking is likely to be funded with monies from the US Environmental Protection Agency (EPA) and may require permits from the US Army Corps of Engineers. If this is the case, the project is subject to compliance with Section 106 of the National Historic Preservation Act and the regulations of the Advisory Council on Historic Preservation at 36 CFR Part 800. The law and its implementing regulations require a federal agency to take historic properties into consideration and to avoid adversely affecting the properties or mitigating any adverse effects that may result from the undertaking. The Section 106 process is supposed to begin early in project planning while there is a broad range of project alternatives that may avoid affecting historic properties.

Given that the scoping document implies that property acquisition may take place prior to completion of the environmental studies that will be included in the EIS and that we have had numerous calls from concerned property owners in New Hill about the possible condemnation of property for the WRF, we feel that we need to provide a strong word of caution to the Division of Water Quality and to the project partners. To proceed

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ADMINISTRATION RESTORATION SURVEY & PLANNING	107 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919) 733-4763/733-4633
	115 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919) 733-6547/715-4801
	115 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919) 733-6545/715-4801

with condemnation of property that is immediately adjacent to a National Register-listed property prior to completing the environmental studies and Section 106 process seems to us to be ill advised and could result in a waste of public funds as well as time and goodwill. Further, steps to secure a site that forecloses adequate consideration of the effects of the proposed facility on the historic district could possibly jeopardize the use of EPA funds for the project.

In light of the speed with which this project appears to be progressing, minus information on historic resources and meaningful consultation with us, we recommend that the parties involved meet to fully discuss this matter and how it is proceeding. Please contact Ms. Gledhill-Earley at 733-4763 to schedule a meeting of the appropriate parties in the very near future and to discuss any questions you may have concerning this matter. Thank you.

cc: Jeff Crow, SHPO
Larry Horton, DWQ
Hannah Stallings, DWQ
Ruth Swanek, CH2M