

February 8, 2013

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United States Department of Agriculture
Rural Development
825 S. Beckford Drive
Henderson, NC 27536

State Clearinghouse
N.C. Department of Administration
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RE: Comments on the NEPA Environmental Assessment for the Wastewater Collection and Treatment System Improvements, City of Creedmoor, Granville County, North Carolina, December 2012, prepared for the US Department of Agriculture Rural Development (RD)

Gentleman:

“Public confidence in government depends on proper stewardship of public moneys.” (UNC School of Government)

Creedmoor’s Waste Water Treatment Plant (WWTP) certainly inspires no confidence here.

The purpose for the proposed project is stated in the EA “to provide adequate wastewater collection, treatment, and disposal facilities to support the 20-year projected residential, commercial, institutional and industrial growths in the Creedmoor wastewater service area.” Creedmoor’s premise for this project is false. The WWTP is unnecessary. **More than sufficient capacity exists with Southern Granville Water and Sewer Authority (SGWASA), the regional water and sewer authority that currently serves Creedmoor and that Creedmoor has refused to join.** The supporting documentation in the NEPA Environmental Assessment for Wastewater Collection and Treatment System Improvements (EA) is error filled and misleading on growth, flow and damage to the environment. (See Attachment 1, SGWASA comment January 17, 2013.)

Alternatives are cursorily presented and perfunctorily dismissed. The cost is absolutely prohibitive to Creedmoor and Granville County. Creedmoor already has the highest tax rate in the Four County Area (Warren, Vance, Granville, Person). If Creedmoor builds this plant, it has the potential to bankrupt not only itself but also SGWASA, the regional provider.

The growth projections Creedmoor is using do not hold up under a casual glance, much less close scrutiny. Even using Creedmoor's outlandish projections, SGWASA has the capacity to meet Creedmoor's needs for the next 20+ years. (See Attachment 1.)

Creedmoor has stated repeatedly and often to anyone who would listen that the Southern Granville Water and Sewer Authority (SGWASA), the regional authority for the southern end of Granville County, does not have sufficient capacity for Creedmoor's anticipated growth. SGWASA does have that capacity and has had that capacity, and will have that capacity for at least the next 20 years.

Creedmoor's own, special no-one-can-share treatment plant was born of a petty, small town, squabble over who controlled allotments. This WWTP will destroy the regional approach for solutions to water and sewer needs in Granville County in the coming decades.

Creedmoor's best, most feasible, practicable, reasonable, and most obvious to everyone alternative is not even offered. The EA should be thrown out on this basis alone. **Creedmoor is a customer, not a member, of SGWASA.** Membership in SGWASA is the best, most economical alternative. SGWASA would compensate Creedmoor for its septic and water lines. (An offer has been made to do so.) A formula for the sewage allotments between the members could be worked out. Rates would decrease for all the citizens of Creedmoor.

Fund an arbitrator instead to work this out. It should have been one of the alternatives suggested. It would have been a whole lot cheaper in dollars and aggravation than this threat of a plant!

So the three alternatives presented that address SGWASA and Creedmoor leave out that very important detail of membership. Creedmoor refuses to commit to membership and chooses to remain a retail customer.

So the one best alternative is not considered at all. It absolutely should have been part of the discussion and offered as an alternative.

The effects are not confined to Granville County because the WWTP will require an interbasin transfer from Falls Lake (the Neuse) to the Tar River. It will decrease the water available to Raleigh in Falls Lake, Raleigh's already insufficient water supply. Raleigh WANTS the effluent that will have significant, harmful and costly effects on the land and the Tar River water in Granville County. (See Attachment 2, email October 11, 2012 from Kenneth Waldroup. Also Attachment 3 City of Raleigh comments January 30, 2013.)

The landowners here do not know that Creedmoor is going to run the pipes along their land, or build a wastewater treatment plant next door. This project is not confined to Creedmoor city limits but runs pipe for miles and miles away from the

city across farmland. The folks SGWASA serves do not have a clue that Creedmoor is trying to pull out as a customer and leave them holding the bag. No ads in the local paper (Butner-Creedmoor News) but only in the Oxford Ledger. Ed Mims, county commissioner for District 5 has publicly questioned this issue of non-disclosure. (Granville County Environmental Affairs Committee meeting, January 14,2013)

The proposed WWTP will have a very significant negative impact on the environment, flora and fauna. There are three federally listed endangered species that occur in the State of North Carolina. Two of the three are in the immediate vicinity of the discharge point—the dwarf wedge mussel (DWM) at the point of discharge and Harperella just downstream. Creedmoor is advancing the facetious argument that the Cannady Mill discharge point is reasonable because it is located below Oxford's discharge point in Fishing Creek. The Tar River is still struggling to recover from decades of raw sewage spills by the Oxford plant. The discovery of the endangered species in the survey from the summer of 2012, detailed in the EA, indicates a recovery is beginning. Perhaps subpopulations of Harperella and DWM from the larger colonies up-stream are finally beginning to re-establish in the Wilton Slopes area. The city, state, and federal governments want to undo this recovery with more effluent. The numbers in the study by The Wooten Company do not take into account the existing effluent flow percentages of the Oxford WWTP. This very low-flow, vital, nationally recognized river is going to be a little clean river water mixed with millions of gallons of effluent from TWO wastewater treatment plants. The proposals to mitigate do not properly address the low-flow nature of the river and Oxford's already existing effluent which greatly compound the impact of this new proposed plant. They are not even working off current flow for the discharge point; 1979 is the date of the last measurements made in the Tar River at Cannady Mill Rd. (See Attachment 3,USGS letter from Curtis Weaver June 29,2012 in EA). This sewage treatment plant requires more due diligence than this study provides. This plant will have a very significant impact, fiscally and environmentally on the area. The least that could be demanded is accurate information on flow data and what is in that flow now.

Hastily prepared, inadequately researched, Creedmoor disregards the importance of environmentalists' concerns.

The grant/loan funding request to USDA is based on erroneous numbers from costs to flow to growth to damage to the environment.

This proposal is also based on the 2000 census numbers, the reason for all the haste. Our entire state, our nation, has redistricted and held elections for the new districts based on the 2010 census. If this EA did not have a December 2012 date, 2010 census numbers would be required to be used in the analyses and this project would not go forward. This may be a technicality, but the EA/PER document was not a public document until January 2013.

One long range alternative, ignored because of the haste involved to complete the EA by “December” -and because there was only one, predetermined, desired outcome- is a true regional approach with all major parties at the table. Those would be Raleigh, all Granville County players, and Durham—who should also have been considered as one of Creedmoor’s alternatives in this EA! Oxford, Creedmoor, and SGWASA could pool their limited resources and, long term, plan to treat water that originates in Kerr Lake (Roanoke Basin) and discharge to Falls Lake (Neuse Basin). The neighbor to the south, Raleigh, might even help with planning and funding as it would increase the water available in Falls Lake, and potentially eliminate the discharge completely in the delicate, environmentally sensitive headwaters of the Tar.

The days of funding piecemeal approaches to water and wastewater solutions are over. The only way to prepare for future demands and stresses is true regional systems that study and use interbasin transfers in the least damaging ways.

The least that could be expected is a thorough study and assessment in place of this hastily prepared and inaccurate document. The hope is that Creedmoor has to become a member of SGWASA for the good of all the citizens of Granville County, Creedmoor most of all!

Rejecting this proposal would be the most responsible way to restore public confidence in government. Creedmoor’s proposal is a flagrant example of government waste—not proper stewardship of public monies or of public, natural resources.

Sincerely,

Jean Blaine