



## TECHNICAL MEMORANDUM

To:  
Jay Meyers, PE, Town of Fuquay-Varina  
Vic Czar, PE, City of Sanford

Copies:  
Michael Wang, PE, Hazen and Sawyer  
Reed Palmer, PE, Hazen and Sawyer  
Linda Diebolt, Hazen and Sawyer  
Keven Arrance, Hazen and Sawyer

From:  
Mary Sadler, PE

Date:  
January 7, 2021

Subject:  
Summary of Public and Agency Scoping Comments  
Town of Fuquay-Varina Water Supply and Interbasin Transfer Project

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General Statute §143-215.22L outlines the requirements for public notification that are triggered when an applicant files a Notice of Intent to File (NOI) a Petition. The Town submitted the NOI to the Environmental Management Commission (EMC) on September 3, 2020. Three public meetings were required within 90 days of the NOI submittal. The public meetings were held in specific locations as mandated by the Statute. The meetings were held in the Town of Cary (receiving basin), Chatham County (source river basin upstream of point of withdrawal), and the City of Fayetteville (source river basin downstream of the point of withdrawal). The public comment period closed on November 20, 2020.

Concurrent with the public notification process, agency scoping comments were solicited in accordance with the State Environmental Policy Act (SEPA). A scoping letter was submitted to the Department of Administration (DOA) Review Clearinghouse on October 7, 2020. The project was assigned the number SCH File # 21-E-0000-0754. The Clearinghouse comment period closed on November 9, 2020.

Hazen assembled a database of all comments received during the scoping process. Attachment A provides a summary of the comments as entered into the comment database.

The following is a summary of the comments received from the public:

- General opposition to transfer.
- “Massive” amount of water being “stolen” from the Cape Fear River.
- Triangle communities need to establish sustainable water supply mechanisms that do not deprive downstream residents.
- “Strong” water flow in the Cape Fear River crucial to provide a buffer for times of drought, to dilute chemicals and pollutants contaminating water supply, and to provide recreational opportunities.
- Water conservation and efficiency lacking. Consider incorporating measures into Town’s Municipal Ordinance.

- Impact of climate change on future condition.
- Drought impacts.
- Reduction in stream flow and the impact of pollution and chemical releases.
- Social inequity of diverting “critical water resources” from poorer more diverse downstream users to sprawling, wealthier, and whiter suburban communities.
- Return water to the Cape Fear River at a reasonable rate and quality.
- Public education and awareness to encourage property owners to conserve water.
- Request for City and Town to actively participate in the Triangle Water Partnership to facilitate evaluation of Sanford as a regional water and wastewater provider and as neighboring communities evaluate costs and benefits of multiple regional water supply and regional wastewater treatment options.
- Request for Town to consider buying water from other regional suppliers to satisfy peak day demand.
- Consider change in growth patterns if transfer is not approved.
- Assess impervious surface impacts of growth.
- Assess cost of service (water, sewer, stormwater, civic) for the growth that transfer will support. Excess revenue as a result of the transfer should be used to offset impacts of induced development on water quality and environment in receiving basin.
- Assess cost of energy between alternatives and impact of carbon reduction limits shifting land use spatial patterns.
- Consider the impact of future total withdrawal from the Cape Fear River by Sanford and its partners and not just the incremental increase in withdrawal to serve Fuquay-Varina.
- Address condition and fate of Buckhorn Dam and impact on fish passage.
- Contamination concern regarding PFAS compounds, 1,4-dioxane, and other emerging contaminants.
- Recommendation for Sanford and partners to develop a conservation plan for the lower Deep and lower Haw Rivers that would identify properties with high conservation and water resources values. The Triangle Land Conservancy, Triangle J Council of Governments, and the Fund developed a Watershed Conservation Plan as a component of the Jordan Lake One Water Initiative in 2019. More at <https://www.triangleland.org/cms/wp-content/uploads/2019/08/jordan-river-watershed.pdf>. The Triangle Land Conservancy also prepared a conservation assessment of the Lower Deep and Upper Cape Fear Rivers in 2001. More at <https://www.triangleland.org/cms/wp-content/uploads/2015/12/deep-riv-public-complete.pdf>.
- Potential impact to protected and candidate species in each watershed.
- Question regarding the Town’s stormwater management ordinances and policies relative to the capture, reuse, infiltration, treatment, and reduction of stormwater and flooding from new development. Provide incentives to capture and reuse rainwater and stormwater for non-potable purposes or incentives for nature-based green stormwater infrastructure to both reduce flooding

and prevent water pollution.

- Trends in per capita usage.
- Impact of transfer on financing the project.
- Wake County should consider strengthening its stormwater management/flood reduction policies.
- Request that Town propose a sustainable solution to the water management issue in the Cape Fear and the Neuse River basins.
- Consider water supply protection policies for Hector Creek, Neils Creek, and Harnett County's water supply.

The following is a summary of the comments from utilities, persons representing utilities, or municipal government:

- General opposition to transfer.
- Water quality issues from industrial dischargers and emerging contaminants.
- Town's Local Water Supply Plan (LWSP) does not reflect interbasin transfer.
- Impacts to communities downstream have not been identified.
- Other alternatives have not been explored or identified.
- Concern over water diversion and long-term water supply impact on downstream communities in the Cape Fear River basin.
- Negative ecological impacts.
- Concern that an adjustment in the 7Q10 will affect downstream users and increase the likelihood of water shortages. Consider USGS work to update the 1994 report "Low-flow Characteristics of Streams in North Carolina."
- Reduction of streamflow will exacerbate pollutant concentrations and algal blooms, particularly in low flow.
- No guaranteed reservoir storage (e.g., Jordan Lake) during drought conditions.
- Precedent for significant IBT (Cary, Apex) returning water to Cape Fear River.
- No evidence that the Town is unable to obtain water from the Neuse.
- Town is required to prove that the amount of the transfer does not exceed the amount of the projected shortfall under the applicant's water supply plan after first accounting for all other sources of water available to the applicant.
- Instream flow studies to assess the quantity and quality of wildlife habitat as a function of flow is appropriate for addressing fish and wildlife habitat.
- Return of water to the Cape Fear as mitigation for adverse water quantity and quality effects of IBT.
- Fayetteville region depends on having surplus water supply to attract new industry. Approximately 72 mgd is needed by 2060.

- Town should review water system improvements in lieu of the transfer, including replacing existing water meters and developing a leak detection program.
- Implement water conservation measures and a program to educate residents, particularly through better irrigation practices.
- Fayetteville did not receive an allocation from Jordan Lake. The Jordan Lake Allocation Recommendation and Surface Water Supply Plan did not account for any future withdrawals between Jordan Lake outfall and Fayetteville Lock and Dam #3. This study should be updated before additional transfers or withdrawals can be permitted.
- Lower Cape Fear Water and Sewer Authority, Brunswick County, and Cape Fear Public Utilities do not support any action that reduces the available water supply to the Lower Cape Fear, as significant capital investments have been made to use the 106 mgd permitted allocation.

The following is a summary of agency comments from SEPA scoping through the Review Clearinghouse:

- Include an analysis for a return of water to the Cape Fear River.
- Include verification that Town's wastewater treatment plant has the capacity to treat any increase in overall volume and waste load to the Neuse River to remain in compliance with the NPDES permitted nitrogen limit.
- Based on the City's LWSP, future sales of 6 mgd will cause the City to exceed their total available supply. The preferred alternative must show that the demand-supply ratio for the City is maintained at no more than 80%.
- Concern over stormwater from highly urbanized areas (e.g., Swift and Middle Creeks are of particular concern due to several state listed threatened and endangered species).
- Secondary impacts from increased water supply will facilitate growth and an increase in impervious surface and severe stormwater runoff. Increased runoff may cause degradation of aquatic habitats through accelerated stream bank erosion, channel changes, bedload changes, altered substrates and scouring of stream channels.
- Consider additional measures to protect aquatic and terrestrial wildlife species in developing landscapes.
- Concern over habitat loss, degradation, or fragmentation of wildlife.
- Reduction in water flow in the Cape Fear River could impede reproduction of sensitive species.
- Discuss cumulative impacts of secondary development facilitated by the proposed project. Weigh economic benefits of growth against costs of associated environmental degradation.
- Address specific measures to control stormwater, stream corridor protection, riparian habitat, and floodplain development.



## **ATTACHMENT A**

**Summary of Public and Agency Scoping Comments  
from Comment Database, December 2020**

# Fuquay-Varina IBT Comment Database

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
9/14/2020	Tim H. Holloman	Lower Cape Fear Water and Sewer Authority	Email	Scoping		Is there any documentation or link to look at the permit application prior to the hearings?	9/14/2020	Mary Sadler	All of the current documentation is posted on the Town's website: <a href="https://www.fuquay-varina.org/1098/Interbasin-Transfer">https://www.fuquay-varina.org/1098/Interbasin-Transfer</a> . However, we will not have the public meeting presentation posted until these meetings in October. These public meetings are scoping meetings, so there isn't much technical documentation to review yet.
9/21/2020	Tim H. Holloman	Lower Cape Fear Water and Sewer Authority	Email	Scoping	Water Supply Plan	Would you send me a copy of Fuquay's most recent Water Supply Plan? I see there # is 8479-R, but the DEQ website does not have a downloadable version and I wanted to review it to make comments on their interbasin transfer request.	9/21/2020	Mary Sadler	We do not have a downloadable version either. We just printed the LWSPs from the DWR website. DWR used to have downloadable versions, but for some reason they have removed that functionality. Attached is the 2019 LWSP printed to pdf from the website.
9/23/2020	Mayor Leonard Fillyaw	Town of Teachy	Email	Scoping		Approve of project if meets needs of Town			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
10/13/2020	Brian Gaskell	Fayetteville Public Works Commission Citizen Advisory Board	Email	Scoping	Draft EIS	<p>I am a resident of Fayetteville and have intently followed the discussion regarding Fequay-Varina's Interbasin Transfer request from the Cape Fear River to the Neuse River. I regret that due to a previous commitment, I will not be able to attend the public hearing scheduled for Wednesday, October 21. Therefore, as a concerned citizen, Fayetteville Public Works Commission customer, and member of the Fayetteville Public Works Commission Citizen Advisory Board, I would like to share that I am opposed to the current request, due to the following reasons:</p> <ol style="list-style-type: none"> <li>1. Nowhere in the plan to I see where the 4-8 million gallons of water withdrawn from the Cape Fear River must be returned to it. I also find it disturbing that related impacts to communities downstream have not been identified.</li> <li>2. I find it unacceptable that there is no mention of other alternatives that have been explored or identified by Fuquay-Varina. It would seem a transfer request would be a step of last resort, not the first.</li> <li>3. I am concerned that diverting water flow away from the Cape Fear could inhibit the ability of adequate water resources for communities further down the Cape Fear River. After all, isn't it reasonable to expect that there could be additional growth in areas such as Fayetteville, Lillington and Wilmington, which also rely on this valuable resource? What alternatives would those communities have if this proposal is</li> </ol>			

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10/13/2020	Brian Gaskell	Fayetteville Public Works Commission Citizen Advisory Board	Email	Scoping	Draft EIS	<p>approved?</p> <p>4. I do not see how this proposal could have any positive environmental impact on wildlife/fish habitats. Lower water levels almost always lead to negative ecological impacts.</p> <p>5. It is my understanding that the proposed 4-8 million gallons/day is only an average figure, and that the actual withdraw could be higher or lower, depending on need. That is a significant amount of water...it is unsettling to consider that this amount could be withdrawn from its natural flow, especially considering this area's continued susceptibility to periods of dry weather/water shortage.</p> <p>I appreciate the opportunity to share my concerns on this issue and thank you for your time. I look forward to a decision that will be in the best interest of ALL residents of North Carolina.</p> <p>Please feel free to contact me if you would further like to discuss this matter.</p>			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
10/14/2020	Lindsey Hallock	Cape Fear Public Utility Authority	Email	Scoping	Draft EIS	<p>North Carolina has experienced rapid growth over the past decade, a trend that has impacted communities up and down the Cape Fear River and is projected to continue. As communities begin to plan for a larger population, they are simultaneously working to understand the future impacts of climate change on the region. These two forces, increased demand and climate change, introduce uncertainty into water resources planning and may disproportionately impact downstream communities if interbasin transfers (IBTs) are approved in the basin. The U.S. Environmental Protection Agency estimates that most of the state of North Carolina has already warmed between one-half and one degree over the last century. Additionally, sea levels on the North Carolina coast are rising nearly one inch every decade. For coastal communities like the one Cape Fear Public Utility Authority (CFPUA) serves, increased temperatures may increase local water demand while also drawing moisture out of the basin. In addition, reduced groundwater capacity and higher treatment costs resulting from saltwater intrusion could increase our reliance on the Cape Fear River as a source of raw water for the community. Long-term supply allocations from the Cape Fear River are calculated using an estimate of expected low flow levels called the "7Q10." The 7Q10 is equal to the lowest average flow for seven consecutive days expected to occur once in 10 years on average based on the historic record. The maximum allowable withdrawal is 20 percent of the 7Q10, which is</p>			

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10/14/2020	Lindsey Hallock	Cape Fear Public Utility Authority	Email	Scoping	Draft EIS	<p>currently set at 106 million gallons per day (MGD) at Lock &amp; Dam Number 1 –the raw water intake CFPUA shares with our partners in the region.</p> <p>In 2019, CFPUA and its partners acknowledged that a regional approach to water resources planning was needed to formalize allocations at Lock &amp; Dam Number 1 and provide a level of certainty to communities as they plan for future needs. That year CFPUA, Brunswick County, and the Lower Cape Fear Water and Sewer Authority signed an interlocal agreement (ILA) that allocated the 106 MGD allotment among the communities served by each partner. The ILA now serves as the foundaon for several large capital investment projects in southeastern North Carolina. In addition, CFPUA and our partners have already invested public funds and constructed the permitted infrastructure necessary to withdraw up to 106 MGD from the Cape fear River at Lock &amp; Dam #1 to supply their customers in southeastern North Carolina. It is CFPUA’s opinion that IBTs from upstream users, such as the proposed transfer from Fuquay Varina, may negavely impact source water availability for downstream communities that are already dealing with uncertaines related to future growth, climate change, and a 7Q10 number that has not been assessed in decades. By decreasing the amount of available surface water today, an approval of Fuquay Varina’s IBT or any other upstream IBTs increases the risk that downstream communities may face shortages in the future. As a result, CFPUA recommends that Fuquay Varina’s request for an IBT</p>			

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10/14/2020	Lindsey Hallock	Cape Fear Public Utility Authority	Email	Scoping	Draft EIS	<p>certificate be denied. CFPUA also recommends that future projections of various flow data scenarios for the Cape Fear River be made available to communities dependent on the river as source water. It is CFPUA's understanding that the U.S. Geological Survey is currently considering an update to the 1994 report produced by Giese and Mason, "Low-flow Characteristics of Streams in North Carolina," to provide more complete river flow data for North Carolina. CFPUA recommends that NCDEQ support this project in any way possible and use the findings to assist all communities in planning for the future.</p>			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
10/19/2020	David Wainwright	SEPA Coordinator, Division of Water Resources	Email	Public Hearing		<p>Basin Planning Branch:</p> <p>1.) Please include discussion on feasibility of piping treated wastewater back to the Cape Fear Basin.</p> <p>2.) Include verification that the town has the capacity to treat any increase in overall volume and waste load to the Neuse River NSW basin and remain in compliance with the NPDES permitted N-limit.</p> <p>Modeling and Assessment Branch:</p> <p>1.) No comment at this time.</p> <p>Water Supply Planning Branch:</p> <p>1.) Based on data in Sanford's 2019 LWSP, future sales of 6.0 MGD will cause them to exceed their total available supply as shown in the following chart. Although a timeframe has not been noted, the chart shows the demand-supply situation for Sanford if the additional water sales occurred by 2030. In order for the preferred alternative to be acceptable, the demand-supply ratio for Sanford would need to be maintained at no more than 80%.</p>			
10/19/2020	O.C. Holloway	Fayetteville Citizen	Email	Scoping	Draft EIS	I am in opposition to the Cape Fear River Basin Water Transfer.			

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10/22/2020	James R Konneker	Fayetteville Resident	Email	Scoping		<p>As a resident of Fayetteville, I'm concerned about the IBT request initiated by the Town of Fuquay-Varina. We are dependent on the Cape Fear River for our water supply and I am concerned that IBT transfer request, if approved may have a permanent negative impact on our community as well as all other communities below the City of Sanford.</p> <p>Previous IBT certificates included requirements for water to be returned to the Cape Fear River. It is my understanding that Fayetteville and PWC expect that:</p> <ol style="list-style-type: none"> <li>1. A thorough process be completed that includes full consideration of the impact on all communities downstream/dependent on the Cape Fear River.</li> <li>2. Before any IBT certificate is issued, it has been demonstrated that no alternate option that would eliminate the need for an IBT is available.</li> </ol> <p>History has shown the potential disastrous result on a river's viability if indiscriminate water use without returning the water back to its basin. There is basically no water flow into the Gulf of California at the mouth of the Colorado River. Israel and Jordan are considering a Red Sea to Dead Sea canal to replace was removed from the Jordan River basin.</p> <p>Previous decisions have exasperated the situation. Currently 96% of Jordan Lake's supply pool has already been allocated, with no allocation having been granted to PWC despite multiple requests. Fayetteville and</p>			

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10/22/2020	James R Konneker	Fayetteville Resident	Email	Scoping		<p>other nearby communities are thus highly dependent on widely fluctuation flows n the Cape Fear River as opposed to stored water in Jordan Lake. As a result, during drought conditions, communities downstream of Jordan Lake must hope that the Corps of Engineers will release enough water to assimilate and flush out pollutants and maintain an adequate water supply. The more IBT out of the Cape Fear Basin which occurs, the more difficult this task.</p> <p>Under NC law, when IBTs are approved, the impacts must be mitigated to the maximum degree practicable. Consequently, source alternatives within the Neuse River Basin should be fully evaluated by Fuquay-Varina and, for any remaining IBT, treated waste water should be returned to the Cape Fear Basin.</p> <p>Fuquay-Varina has decided to make a major water supply investment in expansion of the Sanford WTP. Consequently, if this IBT goes forward, major investments in wastewater pumping and treatment infrastructure should likewise be considered to return water back into the Cape Fear Basin.</p>			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
11/3/2020	Melodi Deaver	Division of Waste Management, Hazardous Waste Section	Scoping Clearinghouse Comments	Scoping		<p>Any hazardous waste generated from the demolition, construction, operation, maintenance, and/or remediation (e.g. excavated soil) from the proposed project must be managed in accordance with the North Carolina Hazardous Waste Rules. The demolition, construction, operation, maintenance, and remediation activities conducted will most likely generate a solid waste, and a determination must be made whether it is a hazardous waste. If a project site generates more than 220 pounds of hazardous waste in a calendar month, the HWS must be notified, and the site must comply with the small quantity generator (SQG) requirements. If a project site generates more than 2200 pounds of hazardous waste in a calendar month, the HWS must be notified, and the facility must comply with the large quantity generator (LQG) requirements.</p> <p>Generators are required to determine their generator status and both SQGs &amp; LQGs are required to obtain a site EPA Identification number for the generation of hazardous waste.</p>			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
11/3/2020	Melodi Deaver	NCDEQ Division of Waste Management, Hazardous Waste Section	Scoping Clearinghouse Comments	Scoping		<p>The Hazardous Waste Section has reviewed the proposed for the Town of Fuquay-Varina's Water Supply and Interbasin Transfer project and would like to make the following comment:</p> <p>Any hazardous waste generated from the demolition, construction, operation, maintenance, and/or remediation (e.g. excavated soil) from the proposed project must be managed in accordance with the North Carolina Hazardous Waste Rules. The demolition, construction, operation, maintenance, and remediation activities conducted will most likely generate a solid waste, and a determination must be made whether it is a hazardous waste. If a project site generates more than 220 pounds of hazardous waste in a calendar month, the HWS must be notified, and the site must comply with the small quantity generator (SQG) requirements. If a project site generates more than 2200 pounds of hazardous waste in a calendar month, the HWS must be notified, and the facility must comply with the large quantity generator (LQG) requirements.</p> <p>Generators are required to determine their generator status and both SQGs &amp; LQGs are required to obtain a site EPA Identification number for the generation of hazardous waste.</p> <p>Should any questions arise, please contact Melodi Deaver at 919-707-8204</p>			

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11/4/2020	Gabriela Garrison, Eastern Piedmont Coordinator, Habitat Conservation	North Carolina Wildlife Resources Commission	Scoping Clearinghouse Comments	Scoping		<p>1. Concerns with IBT from the Cape Fear to Neuse River basin because of impacts to receiving streams from added effluent. Streams in the Neuse River watershed have already been adversely impacted by effluent and stormwater from highly urbanized areas. The proposed effluent from the IBT could further impact aquatic resources and water quality in affected areas. Swift and Middle Creeks are of particular concern because there are records for several state listed threatened and endangered species in these systems.</p> <p>2. The Cape Fear River basin supports several listed species as well as important sport fish populations. American shad, striped bass, Atlantic sturgeon and shortnose sturgeon are anadromous fish that use the Cape Fear River for spawning. Significant reductions in water flows could impede the reproductive success of these and other species. Reductions in water levels may also result in the dewatering of nursery areas.</p> <p>3. Secondary impacts from increased water supply will facilitate a surge in industrial, commercial and residential development. This will lead to increased impervious surfaces, resulting in more severe stormwater runoff. In addition to changing stream morphology, increased runoff may cause degradation of aquatic habitats through accelerated stream bank erosion, channel changes, bedload changes, altered substrates and scouring of stream channels</p> <p>4. The NCWRC encourages the</p>			

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11/4/2020	Gabriela Garrison, Eastern Piedmont Coordinator, Habitat Conservation	North Carolina Wildlife Resources Commission	Scoping Clearinghouse Comments	Scoping		<p>applicant to consider additional measures to protect aquatic and terrestrial wildlife species in developing landscapes. The NCWRC's Guidance Memorandum to Address and Mitigate Secondary and Cumulative Impacts to Aquatic and Terrestrial Wildlife Resources and Water Quality (August 2002; <a href="http://www.ncwildlife.org/Portals/0/Conserving/documents/2002_GuidanceMemorandumforSecondaryandCumulativeImpacts.pdf">http://www.ncwildlife.org/Portals/0/Conserving/documents/2002_GuidanceMemorandumforSecondaryandCumulativeImpacts.pdf</a>) details measures to minimize secondary and cumulative impacts to aquatic and terrestrial wildlife resources</p> <p>5. Include descriptions of fish and wildlife resources within the project area, and a listing of federally or state designated threatened, endangered or at-risk species. When practicable, potential borrow areas to be used for any anticipated project construction should be included in the inventories. A listing of designated species can be developed through consultation with the NC Natural Heritage Program</p> <p>6. Surveys should be conducted by biologists with both state and federal endangered species permits.</p> <p>7 . Include descriptions of any streams or wetlands affected by the project.</p> <p>8. Include project maps identifying wetland areas. Identification of wetlands may be accomplished through coordination with the U.S. Army Corps of Engineers (COE). If the COE is not consulted, the person delineating wetlands should be identified, and criteria listed.</p>			

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11/4/2020	Gabriela Garrison, Eastern Piedmont Coordinator, Habitat Conservation	North Carolina Wildlife Resources Commission	Scoping Clearinghouse Comments	Scoping		<p>9. Provide information on existing, planned and projected sewer and water infrastructure service throughout the service area. A map showing the location of the existing and projected lines and areas containing special resources should be included.</p> <p>10. Define the service area for the project, including any ETJs (extra-territorial jurisdiction), and provide a map of the service area. The map and description should provide the NCDEQ designated 14-digit hydrologic unit codes (HUC) included in the service area.</p> <p>11. Provide a description of project activities that will occur within wetlands, such as fill or channel alteration. Acreage of wetlands impacted by alternative project designs should be listed.</p> <p>12. Provide a description and a cover type map showing acreage of upland wildlife habitat impacted by the project.</p> <p>13. Discuss the extent to which the project will result in loss, degradation or fragmentation of wildlife habitat (wetlands and uplands).</p> <p>14. Discuss any measures proposed to avoid or reduce impacts of the project or to mitigate unavoidable habitat losses.</p> <p>15. Discuss the cumulative impacts of secondary development facilitated by the proposed project. Such discussion should weigh the</p>			

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11/4/2020	Gabriela Garrison, Eastern Piedmont Coordinator, Habitat Conservation	North Carolina Wildlife Resources Commission	Scoping Clearinghouse Comments	Scoping		<p>economic benefits of such growth against the costs of associated environmental degradation.</p> <p>(a) Include specific measures that will be used to address stormwater at the source. Include specific requirements for both residential and industrial developments and Best Management Practices that will be required.</p> <p>(b) Include specific measures that will be used to protect stream corridors, riparian habitat and a minimum of the 100-year floodplain from filling and development. Commitments by the project sponsors to protect area streams with riparian buffers through purchase or conservation easement are of particular interest.</p> <p>16. Include a list of document preparers that shows professional background and qualifications.</p>			

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11/9/2020	Ramona Bartos, Deputy	State Historic Preservation Office (SHPO)	Scoping Clearinghouse Comments	Scoping		<p>Thank you for your submission concerning the above referenced project. We have reviewed the materials provided and offer the following comments.</p> <p>The effects of the proposed undertaking on archaeological sites will depend on the precise extent and depth of ground disturbance. Once this information is available, we request draft project plans be forwarded to this office for review and comment.</p> <p>The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.</p> <p>Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or <a href="mailto:environmental.review@ncdcr.gov">environmental.review@ncdcr.gov</a>. In all future communication concerning this project, please cite the above referenced tracking number. (SCH # 21-E-0000-0754, Wake County, ER 20-2212 )</p>			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
11/9/2020	Bonnie S. Ware	Inactive Hazardous Sites Branch	Scoping Clearinghouse Comments	Scoping		<p>The Superfund Section has reviewed the proximity of sites under its jurisdiction to the Town of Fuquay-Varina project. Proposed project is for the Town of Fuquay-Varina's Water Supply and Interbasin Transfer project.</p> <p>Nineteen (19) sites were identified within one mile of the project as shown on the attached report. The Superfund Section recommends that site files be reviewed to ensure that appropriate precautions are incorporated into any construction activities that encounter potentially contaminated soil or groundwater. Superfund Section files can be viewed at: <a href="http://deq.nc.gov/waste-management-laserfiche">http://deq.nc.gov/waste-management-laserfiche</a>.</p>			
11/10/2020	Arleen Fields	Resident of Fayetteville	Email	Scoping		<p>As a resident of Fayetteville I adamantly oppose the town of Fuquay-Varina's request for a massive interbasin water transfer from the Cape Fear River to the Neuse River. I understand that the Triangle area is developing rapidly, but those communities need to establish sustainable water supply mechanisms that don't deprive downriver residents. A strong water flow in the Cape Fear River is crucial to provide a buffer for times of drought, and to dilute the chemicals and pollutants which are contaminating our water supply in ever-increasing amounts, and to provide recreational opportunities for our residents.</p>			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
11/11/2020	Rev. Jaye White	Resident of Fayetteville	Email	Scoping		<p>Do the people of Fuquay-Varina really want to deprive their neighbors to the south? Does hoarding natural resources seem prudent? I am adamantly opposed to the plan to take so much water from the Cape Fear to deposit it into the Neuse, as many North Carolinians will suffer as a consequence.</p> <p>"Hundreds of thousands of people in the Sandhills rely on our Cape Fear River for accessible and dependable municipal water resources as well as transportation and recreation opportunities. We want to ensure the viability of our river for current and future generations.</p> <p>Several municipalities and utilities across North Carolina currently draw water from our Cape Fear River. Continuous interbasin transfers are not sustainable without clear replenishment and conservation plans so we are advocating for improved water efficiency and public education campaigns in these municipalities to save water and alleviate their supply issues. Droughts have affected our Cape Fear River in the past. IBWTs further reduce river flows during droughts. We want to insulate our water supply against droughts as much as possible.</p> <p>Our Cape Fear River has been impacted by pollution from chemical releases and other recent water quality issues. A reduction in flow as a result of another IBWT will only exacerbate these concerns."</p> <p>Please reconsider your proposal. It seems selfish and unreasonable.</p>			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
11/11/2020	Ruth Gillis	Resident of Fayetteville	Email	Scoping		<p>I'm sorry you are having water problems in Fuquay-Varina, but taking Cape Fear River water doesn't solve problems for anyone - especially Cape Fear River water users.</p> <p>You will need to find another solution to your water needs - like maybe a big campaign for water conservation. Anyway, please leave our water alone.</p>			
11/11/2020	Anna Chott	Sustainable Sandhills	Email	Scoping		<p>I am reaching out to you as a friend of Sustainable Sandhills, an organization that notified my community of plans for implementation of an interbasin water transfer from the Cape Fear River.</p> <p>I implore you to consider a water conservation strategy, rather than moving forward with the IBWT. Our water supply is not infinite, and IBWTs are not sustainable without clear replenishment plans.</p> <p>There are many, many things we as citizens can do to conserve water. However, if the river flow is reduced, our options will be much more limited.</p> <p>Thank you so much for your consideration of this request.</p>			
11/17/2020	Jannessa Peterson	Fayetteville Resident	Email	Scoping		<p>I'm a resident of Fayetteville and highly concerned about the proposed IBWT from the Cape Fear River. Particularly because the town requesting has zero water conservation or mitigating strategies in place.</p>			

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11/19/2020	Arthur Ingalls	Cumberland County Resident	Email	Scoping		<p style="text-align: center;">Water supply</p> <p>I just want to add my comments to the water supply issue. It sounds as if the water supply issue for our area has been resolved for now. The question is what will happen when severe drought occurs. Climatic changes may affect water supply and quality. How will demands be solved? What happens if water qualities are altered? Decisions made now may not be adequate in future. Those of us in Cumberland County may not like our status in years to come. Permanent installations are not easily changed</p>			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
11/19/2020	Jonelle Kimbrough	Sustainable Sandhills	Email	Scoping		<p>One of our impact areas is water quality. We work to maintain accessible, dependable and affordable water for our residents and are concerned about the impact of the proposed IBWT on the Cape Fear River, which is the Sandhills' primary source of potable water. Water demands are increasing in the Sandhills and throughout North Carolina, and several municipalities across the state currently draw water through IBWTs from the Cape Fear River. Our residents need our water in our Sandhills. Continuous IBWTs are simply not sustainable for us. Fort Bragg - the world's largest military installation and our neighbor - also relies on the Cape Fear River for water. Thus, our water resources here are a matter of national security.</p> <p>Droughts have affected the Cape Fear River in the past, and potential flow reductions coupled with IBWTs are bound to have significant effects on the viability of our water in the Sandhills. Furthermore, the Cape Fear River and our residents have faced major water quality and pollution issues as a result of chemical releases into the river. Flow reductions will only exacerbate the concerns created by these threats.</p> <p>Sustainable Sandhills is opposed to the proposed IBWT and encourages its prevention unless Fuquay-Varina can implement clear and forward-thinking stewardship plans for 1) returning our water to the Cape Fear River at a reasonable rate and quality; 2) incorporating and enforcing water efficiency considerations into Town</p>			

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11/19/2020	Jonelle Kimbrough	Sustainable Sandhills	Email	Scoping		<p>construction codes, operation standards and other regulations that advocate for more sustainable development; and 3) creating and disseminating a public education and awareness campaign for Town property owners to encourage them to conserve as much water as possible.</p>			
11/19/2020	Jane G. Starling	Cumberland County Mayor's Coalition	Email	Scoping		<p>Please see the attached resolution passed unanimously by the Cumberland County Mayor's Coalition, in opposition of the Proposed Interbasin Transfer for the Town of Fuquay-Varina. For the purpose of clarification, this is a separate document from the one I sent earlier for the Town of Hope Mills.</p> <p>Content of resolution:  IBT poses increased risks to water supply of Cumberland County  Oppose any permanent transfer of water  Numerous water quality issues from industrial dischargers and emerging contaminants  Reduction of streamflow exacerbate pollutant concentrations and algal blooms, particularly low flow  No guaranteed reservoir storage during drought conditions  Already significant IBT (Cary, Apex) which returns water</p>			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
11/19/2020	Sally Shutt	Strategic Management/ Governmental Affairs Cumberland County	Email	Scoping		<p>Please see the attached resolution passed unanimously by the Cumberland County Board of Commissioners regarding the proposed Interbasin Transfer by the Town of Fuquay-Varina.</p> <p>Resolution content:  IBT poses increased risks to water supply of Cumberland County  Oppose any permanent transfer of water  Numerous water quality issues from industrial dischargers and emerging contaminants  Reduction of streamflow exacerbate pollutant concentrations and algal blooms, particularly low flow  No guaranteed reservoir storage during drought conditions  Already significant IBT (Cary, Apex) which returns water</p>			

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11/19/2020	Mick Noland	Fayetteville Public Works Commission	Email	Scoping		<p>Please find attached comments from the Fayetteville Public Works concerning the Town of Fuquay-Varina proposed IBT.</p> <ol style="list-style-type: none"> <li>1. Fuquay-Varina is required to prove that there are no reasonable alternatives to the proposed inter-basin transfer, and to date, we have seen no analysis or other evidence that Fuquay-Varina is unable to get additional water from the Neuse River Basin or any other source. In considering such alternatives, the EMC is not limited to consideration of alternatives that have been proposed, studied or considered by Fuquay-Varina. Except in circumstances of technical or economic infeasibility or adverse environmental impact, the EMC's determination as to reasonable alternatives must give preference to alternatives that would involve a transfer from one sub-basin to another within the Neuse River Basin (i.e., major receiving river basin) over Fuquay-Varina's proposed alternative that would involve a transfer from one major river basin (Cape Fear) to another major river basin (Neuse).</li> <li>2. Fuquay-Varina is also required to prove that the amount of the transfer does not exceed the amount of the projected shortfall under the applicant's water supply plan after first taking into account all other sources of water that are available to the applicant, and to date, we have seen no analysis or other evidence of that from Fuquay-Varina.</li> <li>3. Fuquay-Varina is required to prove that the benefits of the proposed</li> </ol>			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
11/19/2020	Mick Noland	Fayetteville Public Works Commission	Email	Scoping		<p>transfer outweigh the detriments of the proposed transfer and that the detriments have to be mitigated to the maximum degree practicable, and to date, we have seen no analysis or other evidence of that from Fuquay-Varina. In that regard, Fuquay-Varina must address, and EMC must consider all of the following:</p> <p>a.The EMC must consider the necessity and reasonableness of the amount of surface water proposed to be transferred and its proposed uses. The Sanford WTP is quite a distance from Fuquay-Varina. Fuquay-Varina should identify the geographic boundaries within which the water being requested would be used, including whether that area is entirely within Fuquay-Varina town limits.</p> <p>b.The EMC must consider present and reasonably foreseeable future detrimental effects on the source river basin, including effects on wastewater assimilation and water quality. In recent years, the Cape Fear River upstream and downstream of Fayetteville has been fraught with numerous water quality issues stemming from industrial discharges and other sources. During low-flow periods, further reduction of streamflow can exacerbate pollutant concentrations. Environmental impact assessment of this proposed IBT must address both water quantity and water quality in the Cape Fear River.</p> <p>c.The EMC must consider present and reasonably foreseeable future detrimental effects on the source river basin, including effects on fish</p>			

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11/19/2020	Mick Noland	Fayetteville Public Works Commission	Email	Scoping		<p>and wildlife habitat. Instream flow studies which assess the quantity and quality of wildlife habitat as a function of flow levels are the appropriate means to assess this concern. Reduction of streamflow may negatively impact fish and wildlife which depend on the Cape Fear River.</p> <p>d.The EMC must make a specific finding as to measures that are necessary or advisable to mitigate or avoid detrimental impacts on the source river basin. In this regard, Fuquay-Varina should identify how and in what quantities treated wastewater can be returned to the source basin to reduce the net transfer. Fuquay-Varina has decided to make a major water supply investment in expansion of the Sanford WTP. Consequently, Fayetteville PWC expects that major investments in wastewater pumping and treatment infrastructure will likewise be considered to return water to the source basin. The Cary-Apex IBT has established a clear precedent that return of wastewater to the Cape Fear River can serve as mitigation for adverse water quantity and quality effects of IBT.</p> <p>In summary, unless Fuquay-Varina meets its substantial evidentiary burden, the certificate needs to be denied. If the certificate is granted without sufficient evidence to support it or without a condition to return sufficient quantities of treated wastewater to the Cape Fear River Basin, Fayetteville PWC will contest it, and it is anticipated that other water systems in the lower Cape Fear region</p>			

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11/19/2020	Mick Noland	: Public Works C	Email	Scoping		would consider joining us in doing so.			
11/19/2020	Jane G. Starling	Town of Hope Mills	Email	Scoping		<p>Please see the attached resolution passed unanimously by the Town of Hope Mills Board of Commissioners, regarding the Proposed Interbasin Transfer for the Town of Fuquay-Varina.</p> <p>Resolution Content:  Fayetteville region depends on having surplus water supply to attract new industry. 72 mgd needed by 2060  96% of Jordan Lake water supply has been allocated. No allocation granted to PWC  Downstream communities dependent on Jordan Lake  Concern with drought conditions  Cary/Apex established precedence for return of water  Water quality issues from industrial discharges and emerging contaminants  Climate change affects drought conditions  Request that applicant return water</p>			
11/19/2020	Basin Planning Branch, Nora Deamer	Division of Water Resources	Scoping Clearinghouse Comments	Scoping		<p>Please include a discussion regarding the feasibility of piping treated wastewater back to the Cape Fear basin in order to limit or reduce the interbasin transfer.</p> <p>Please include verification that the Town has the capacity to treat any increase in overall volume and waste load to the Neuse River NSW basin and remain in compliance with the NPDES permitted nitrogen limit.</p>			
11/19/2020	Assessment Branch,	Division of Water Resources	Clearinghouse C	Scoping		No comment at this time.			

Date	Name	Organization	Venue	Phase	In Reference To	Comment	Response Date	Responder	Response
11/19/2020	Water Supply Planning Branch	Division of Water Resources	Scoping Clearinghouse Comments	Scoping		Based on data in Sanford's 2019 LWSP, future sales of 6.0 MGD will cause them to exceed their total available supply as shown in the following chart. Although a timeframe has not been noted, the chart shows the demand-supply situation for Sanford if the additional water sales occurred by 2030. In order for the preferred alternative to be acceptable, the demand-supply ratio for Sanford would need to be maintained at no more than 80%.			

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11/20/2020	Rick Glazier	resident, former NC Representative 2003-2015	Email	Scoping		<p>I am writing as a former member of the NC House of Representatives in opposition to the proposed Fuquay-Varina inter-basin transfer. This proposal continues a distressing and ultimately hazardous and unsustainable path of diverting critical water resources to sprawling, wealthier, whiter suburban and exurban, and unplanned upstream users and polluters from more needed basic water resources for poorer, more diverse downstream users. That was never the purpose behind the inter-basin transfer process---indeed, it was intended to stop these grabs that occur whenever communities upstream grow in an unplanned regional manner to the detriment of those who exist downstream. Adding insult to injury, not to mention, exacerbating environmental injustice, this proposed diversion reeks of racial inequity and widens the systemic inequalities that permeate this state. More time and reflection, particularly given this moment in time, are needed before this transfer should be considered. Water resources are finite and the continued diversion of these resources to wealthier upstream users to the detriment of downstream base capacity is unfair, unnecessary, and ultimately destructive of the ecosystem, confidence in the interbasin, let alone regional planning process, and will lead to real degradation of the resource.</p> <p>Sincerely, Rick Glazier NC Representative 2003-2015</p>			

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11/20/2020	Peter Raabe, Grady McCallie, Matthew Starr	American Rivers, NC Conservation Network, Sound Rivers	Email	Scoping		<p>1. Perfluorinated compounds and water quality</p> <p>Perfluorinated compounds are present at relatively high concentrations in the Haw and Deep Rivers and therefore in the Upper Cape Fear sourcewater for the proposed IBT. Does Fuquay-Varina intend to expose its customers to these contaminants? How does Fuquay-Varina intend to remove PFAS – most of which are not regulated – from drinking water? How much will it cost the utility to manage this pollution? Are these costs factored in to the relative costs of alternatives in the alternatives analysis?</p> <p>If the utility plans to discharge wastewater into the Neuse rather than returning it to the Cape Fear, the transfer will release PFAS into a basin where they have not been found in significant concentrations, and will likely contaminate the sourcewater of downstream water users. How does the utility weigh its potential liability for that pollution and for increased water treatment costs incurred by downstream utilities?</p> <p>2. Alternatives to the proposed transfer</p> <p>What is the per capita water usage in the receiving jurisdiction, and what are the trends? Most utilities have found declining per capita usage over the last 15 years. What are the trends in Fuquay-Varina’s per capita financial liability for infrastructure? What are the upcoming infrastructure burdens that Fuquay-Varina expects to carry,</p>			

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11/20/2020	Peter Raabe, Grady McCallie, Matthew Starr	American Rivers, NC Conservation Network, Sound Rivers	Email	Scoping		<p>and how will the new obligations of financing the interbasin transfer interact with that? What is the return on investment in greater efficiency of water use as compared to the anticipated return on investing in the transfer?</p> <p>What are the options for Fuquay-Varina to continue to buy water from other regional water suppliers rather than taking on the infrastructure and compliance costs of becoming a supplier itself? To the extent that the town is managing risk, trying not to invest too little or too much, are there contractual instruments with other regional supplier that can help distribute or hedge this risk? For example, can Fuquay-Varina negotiate a contract with another regional supplier to ensure that, if demand spikes in Fuquay-Varina, the town will have access to the water it needs – but if, as a result of various factors, that growth mostly lands in the center cities, Fuquay-Varina won't have over-invested in expensive infrastructure?</p> <p>3. Impacts of growth and mitigation of those impacts</p> <p>How will Fuquay-Varina grow differently (population, spatial pattern, mix of uses) if the transfer is approved versus if the transfer is not approved? What is the anticipated increase in impervious surface area that will result from that growth? How will it be distributed across the subwatersheds served by the utility?</p> <p>What is the anticipated marginal cost of service (for water, sewer, and</p>			

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11/20/2020	Peter Raabe, Grady McCallie, Matthew Starr	American Rivers, NC Conservation Network, Sound Rivers	Email	Scoping		<p>stormwater, and for all civic services) for the growth that the transfer will support? Growth dependent on the transfer will increase the jurisdiction's revenue base, and presumably also the per capita demand for services. How will the jurisdiction capture a portion of that increased value, and how will it use that revenue to offset impacts of induced development to water quality and the environment in the receiving basin?</p> <p>What are similar patterns of anticipated impacts across the jurisdictions to which Fuquay-Varina may sell or supply water?</p> <p>Ideally, local stormwater, sediment, and floodplain regulations limit the impacts of induced development on the ecosystem services and natural resources of the receiving basin. In practice, that rarely happens. What policies and ordinances are in place in the receiving jurisdictions?</p> <p>As a result of climate change, North Carolina is receiving more intense storms more frequently, and design standards for infrastructure are not performing as intended. What steps are the receiving jurisdictions taking to ensure their ordinances and standards continue to provide the intended level of protection in the face of ongoing climate change?</p> <p>Both the Neuse basin and the Cape Fear basin are home to a number of state- and federal- protected species that are susceptible to changes in water chemistry and quantity, including impacts from induced development. What impacts will the</p>			

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11/20/2020	Peter Raabe, Grady McCallie, Matthew Starr	American Rivers, NC Conservation Network, Sound Rivers	Email	Scoping		<p>proposed transfer and its impacts have on protected and candidate species in each watershed? How does the applicant propose to avoid or mitigate those impacts?</p> <p>4. Interaction with a low-carbon future</p> <p>Any mechanism to reduce carbon emissions is likely to raise the relative cost of fossil-fuel based energy, including the energy used to transfer water from the Cape Fear to Fuquay-Varina (and to return wastewater, if that ends up being a mitigation measure). How does the cost of energy factor in to the choice between project alternatives, including the 'no action' alternative?</p> <p>Carbon reduction limits are very likely also to shift the spatial pattern of land uses – and therefore water demand – in southern Wake County. These shifts may move away from patterns that require significant individual travel and towards more dense patterns of development (if transit options are available) or towards lower overall growth in demand and tax base (if new residents instead gravitate towards Raleigh, Cary, and other larger cities). The EIS should assess the impact of these changing patterns on the demand for water, the cost of service, and the financial capacity of Fuquay-Varina to invest in and maintain the substantial infrastructure needed both to transfer and to distribute the water.</p> <p>5. Source Water</p>			

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11/20/2020	Peter Raabe, Grady McCallie, Matthew Starr	American Rivers, NC Conservation Network, Sound Rivers	Email	Scoping		<p>The Buckhorn Dam creates a minimal impoundment from which water in the Cape Fear is withdrawn currently. That dam is reaching the end of its design life and no longer serves the purposes for which it was initially built. Additionally, it is a complete barrier to fish migration up and down stream and a hazard for recreational boaters. Will the study address options for water supply that could be implemented to improve the reliability of the water intake in a run-of-river condition?</p> <p>6. Carrying capacity and other water supply needs</p> <p>A perspective underlying many interbasin transfers in North Carolina to date has been the view that water is essentially fungible – that as long as sufficient demand is present, water can and should be moved from basin to basin to meet demand wherever that demand appears. Yet, ultimately, our watersheds have limits to the supply they can provide, and even tighter limits to the supplies they can provide and still serve other values. Where does Fuquay-Varina propose that state environmental managers draw that line? When would Fuquay-Varina say it has grown its raw water supply enough for the next century, or maxed out its proper share of the available resource? What policies is the town putting into place to ensure that it arrives at that point gently, without overshooting at the expense of surrounding towns and the natural environment?</p> <p>We recognize this is essentially asking Fuquay-Varina, in the EIS, to propose</p>			

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11/20/2020	Peter Raabe, Grady McCallie, Matthew Starr	American Rivers, NC Conservation Network, Sound Rivers	Email	Scoping		<p>a sustainable solution to the puzzle of water management not just for itself, but for the larger web of communities in both the source and receiving basins. We think that is appropriate, since by the terms of the proposed transfer, Fuquay-Varina intends to position itself to be a regional water supplier – the town is already not thinking of itself as a lone actor. We also suspect that the Triangle Water Supply Partnership could be a source of information and analytical support as Fuquay-Varina wrestles with this challenge; such a complicated problem is often best solved together rather than through solo, uncoordinated strategies.</p> <p>The Cape Fear River watershed has been the source of longstanding controversy over interbasin transfers, including most recently the contested transfer of water associated with the Western Wake Wastewater Treatment plant. Those cases have demonstrated that downstream water demand in places like Fayetteville is critical to the success of the region. How will Fuquay-Varina and the City of Sanford work collaboratively to ensure that enough water is returned to the Cape Fear River to protect existing and future needs of downstream communities, especially considering climate change?</p>			

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11/20/2020	Mary M. Holmes	Fayetteville Resident	Email	Scoping		<p>I am writing to express my objection to the interbasin transfer request from Fuqua-Varina. There is no reason that the citizens of Fayetteville and downstream should bear the cost, environmental and otherwise, of poor planning of growth upstream.</p> <p>The Cape Fear River is already experiencing great distress due to GenX and other contamination and IBTs. Fuqua-Varina should pump water borrowed from the Cape Fear River Basin back to the same basin once it is used and cleaned.</p> <p>Poorer, browner communities down river should not bear the cost of growth of wealthier, whiter communities. Do the right thing and pump the water back to the Cape Fear River Basin.</p>			

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11/20/2020	Bill Holman	The Conservation Fund	Email	Scoping		<p>I am writing on behalf of the Conservation Fund and the Triangle Land Conservancy (TLC) to urge Fuquay-Varina, Sanford, DWR and Hazen &amp; Sawyer to address the following questions and concerns in the environmental studies and documents for the proposed project.</p> <p>Regional Water Supply &amp; Wastewater Planning Many communities share and depend upon water resources in both the Cape Fear and Neuse River Basins.</p> <p>The Fund &amp; TLC commend the high levels of planning and collaboration among water utilities, local governments, Triangle J Council of Governments, NC Division of Water Resources, conservation organizations and other partners in the Research Triangle Region, spanning both the Upper Cape Fear and Upper Neuse River Basins.</p> <p>The Triangle Water Supply Partnership encourages collaboration, information sharing and identification of cost-effective investments to provide water supply and wastewater treatment for a growing region. Most utilities in the region are active members, including Harnett County, Chatham County, Holly Springs and Pittsboro. Sanford and Fuquay-Varina are currently not members.</p> <p>We encourage Sanford and Fuquay-Varina to join their neighbors and actively participate in the Triangle Water Partnership. We believe this is particularly important as Sanford considers major expansions of</p>			

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11/20/2020	Bill Holman	The Conservation Fund	Email	Scoping		<p>capacity to become a regional water and wastewater provider and as neighboring communities evaluate the costs and benefits of multiple regional water supply and regional wastewater treatment options.</p> <p>Sanford has the capacity to treat 12 MGD and already provides water to Broadway, Lee County and Chatham County. Sanford will likely increase sales of water to Lee and Chatham County in the future. We understand other communities like Pittsboro and Holly Springs are considering purchasing water from Sanford as well. Environmental studies and documents should consider the impacts of future total withdrawal from the Cape Fear River by Sanford and its partners and not just the incremental increase in withdrawal to serve Fuquay-Varina.</p> <p>Buckhorn Dam</p> <p>Buckhorn Dam was constructed in 1908 to generate electricity. It is currently owned by Duke Energy. The dam creates Buckhorn reservoir. Sanford's intake is upstream from the dam near Avents Ferry/NC 42. The dam stopped generating electricity many years ago. Duke has decommissioned its former coal-fired Cape Fear Steam Station at Moncure, and the reservoir is no longer needed for cooling water. The dam is a major barrier for fish passage, a major hazard for paddlers, and a liability for its owner, Duke Energy. The condition and fate of Buckhorn Dam and reservoir should be addressed in the study.</p>			

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11/20/2020	Bill Holman	The Conservation Fund	Email	Scoping		<p>The Fund has been a partner with the Town of Madison, NC Wildlife Resources Commission, US Fish &amp; Wildlife Service, Dan River Basin Association and others to lower the Lindsey Bridge Dam on the Dan River to secure the Town's water supply, improve fish passage, provide canoe access and increase public safety. The Lindsey Bridge Dam project on the Dan River may be a good model for Buckhorn Dam.</p> <p>Source Water Protection</p> <p>The 2019 Annual Water Quality Report, prepared to comply with the Safe Drinking Water Act's Source Water Protection requirements, rates the Sanford's drinking water source as having a higher inherent vulnerability rating, a moderate contamination rating and a higher susceptibility rating.</p> <p>The Environmental Management Commission has classified the Cape Fear River at Buckhorn as Water Supply IV, which provides minimal protection from point and non-point sources of pollution.</p> <p>Like Pittsboro and other communities that withdraw from the Haw River and Cape Fear River Sanford is concerned about contamination of its drinking water by PFAS compounds, 1, 4-dioxane and other emerging contaminants that neither US EPA nor the EMC have developed drinking water standards or maximum contaminant levels for.</p> <p>EPA and the EMC will eventually establish standards or MCLs for these</p>			

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11/20/2020	Bill Holman	The Conservation Fund	Email	Scoping		<p>compounds to protect public health. Will expanded water treatment capacity be designed to anticipate and meet future standards or MCLs?</p> <p>Will the EPA or DEQ increase their efforts to prevent and reduce pollution from wastewater discharges into the Haw, Deep and Cape Fear Rivers to protect public health and the environment?</p> <p>The Fund &amp; TLC commend the efforts of the Jordan Lake One Water Association (JLOW) and the Upper Neuse River Basin Association (UNRBA) in collaborating and jointly raising funds to reduce pollution in Jordan Lake and Falls Lake, respectively. The Fund &amp; TLC note that the Town of Cary set aside \$750,000 in its 2020-21 water utility budget for watershed protection efforts. Cary plans to make this an ongoing investment. Other users of Jordan Lake are expected to follow Cary's lead.</p> <p>The Fund &amp; TLC encourage Sanford, its existing partners, and its future partners, including Fuquay-Varina, to set aside funds to protect their water supplies as they also budget millions for expansion of drinking water treatment and distribution infrastructure. Cary and Raleigh budget their watershed protection efforts at 15 cents/1000 gallons consumed.</p> <p>The Fund &amp; TLC recommend that Sanford and its partners to develop a conservation plan for the lower Deep and lower Haw Rivers that would identify properties with high</p>			

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11/20/2020	Bill Holman	The Conservation Fund	Email	Scoping		<p>conservation and water resources values.</p> <p>Triangle Land Conservancy, Triangle J Council of Governments, and the Fund developed a Watershed Conservation Plan as a component of the Jordan Lake One Water Initiative in 2019. More at <a href="https://www.triangleland.org/cms/wp-content/uploads/2019/08/jordan-river-watershed.pdf">https://www.triangleland.org/cms/wp-content/uploads/2019/08/jordan-river-watershed.pdf</a>.</p> <p>Triangle Land Conservancy also prepared a conservation assessment of the Lower Deep and Upper Cape Fear Rivers (from House in the Horseshoe to Raven Rock State Park) in 2001. More at <a href="https://www.triangleland.org/cms/wp-content/uploads/2015/12/deep-riv-public-complete.pdf">https://www.triangleland.org/cms/wp-content/uploads/2015/12/deep-riv-public-complete.pdf</a>.</p> <p>Threatened &amp; Endangered Species</p> <p>Both the Neuse River Basin and the Cape Fear Basin are home to a number of state- and federal-protected species, including amphibians and fish that are susceptible to changes in water chemistry and quantity, including impacts from induced development. What impacts will the proposed transfer and its impacts have on protected and candidate species in each watershed?</p> <p>Managing Growth</p> <p>Southern Wake and Northern Harnett Counties are growing rapidly. Fuquay-Varina is seeking additional water from the Cape Fear River Basin to sustain its growth.</p>			

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11/20/2020	Bill Holman	The Conservation Fund	Email	Scoping		<p>Will Fuquay-Varina's stormwater management ordinances and policies ensure the capture, reuse, infiltration, treatment, and reduction of stormwater and flooding that new development can cause? Does Fuquay-Varina provide incentives to capture and reuse rainwater and stormwater for non-potable purposes or incentives for nature based green stormwater infrastructure to both reduce flooding and prevent water pollution?</p> <p>Wake County should also consider strengthening its stormwater management/flood reduction policies. Wake has little capacity to ensure that stormwater control measures are maintained. Wake County could also provide more technical and financial support for watershed planning and nature based green stormwater infrastructure projects that provide benefits to the county and municipalities.</p> <p>Hector and Neils Creeks rise in Northern Harnett County just south of Fuquay-Varina and join the Cape Fear River just above Harnett Water's intake and treatment works in Lillington. Fuquay-Varina currently purchases water from Harnett Water. What policies will be put in place to protect Hector, Neils and other creeks and Harnett County's water supply?</p>			

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11/20/2020	Paul and Carolyn Hinson	Fayetteville Residents	Email	Scoping		<p>As residents of Fayetteville, we are writing to express our concern about the proposed Inter-basin water transfer request of Fuquay-Varina. Water is a finite resource and critical to us all. If a community uses water from upstream of Fayetteville, they should do the right thing by their neighbors and return it to the Cape Fear River Basin for other communities to use.</p> <p>As we understand it, the water request is to help Fuquay-Varina grow. The communities of the Cape Fear River Basin should not pay the price for growth and development that will help Fuquay-Varina prosper. If Fuquay-Varina needs the water, they should pay to return it to the Cape Fear River Basin and not send elsewhere. While the amount of water and impact to the Fayetteville water supply may seem small, we must ensure that decisions today do not become bad decisions that have significant consequences in the future.</p> <p>Please do the right thing for the citizens of Fayetteville and other communities that depend on the Cape Fear River for their water supply. Find alternatives and do not allow the water to be taken out of the Cape Fear River Basin without being returned.</p>			

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11/23/2020	Tim H. Holloman	Lower Cape Fear Water and Sewer Authority	Email	Scoping		<p>We were not sure this went through on Friday and wanted to resend this morning. Please acknowledge receipt.</p> <p>After reviewing Fuquay-Varina's water supply plan, Lower Cape Fear Water and Sewer Authority believes that Fuquay-Varina's intent to pursue an Interbasin Transfer is premature. We believe that Fuquay Varina should look towards major system improvements of existing infrastructure. Replacing existing meters would better account for monitoring usage and provide revenue needed for system improvements. There are almost a thousand meters or approximately seven percent of their systems meters that are not being accounted for on a regular basis.</p> <p>Also, the lack of a leak detection program is a key maintenance item. Although some pipes are being replaced annually, leak detection could pinpoint issues and provide better data for repairs to be included in a Capital Improvement Plan. At this point they are replacing less than one third of one percent of their existing lines annually.</p> <p>Fuquay-Varina needs to show marked improvement in regards to conservation and education by implementing water conservation measures and a program to educate its residents about how to save water especially through better irrigation practices.</p> <p>Fuquay proposes an eight million gallon per day maximum and four</p>			

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11/23/2020	Tim H. Holloman	Lower Cape Fear Water and Sewer Authority	Email	Scoping		<p>million gallon per day minimum withdrawal with little analysis of environmental impact and the accompanying need for waste treatment facilities to process the additional waste water and minimize the effect of withdrawal on the basin.</p> <p>The Jordan Lake Allocation Recommendation and Surface Water Supply Plan did not account for any future withdrawals between Jordan Lake outfall and Fayetteville Lock and Dam #3 and this study needs updating before additional transfers or withdrawals can be permitted.</p> <p>After the October 20, 2020 scoping meeting, it appears that the entities supplying Fuquay-Varina water may need those resources to meet their own future demands.</p> <p>Before any consideration can be given to and interbasin transfer, Fuquay-Varina should be required to explore alternatives such as ground water sources, merging systems, etc. At this point, Lower Cape Fear Water and Sewer authority would like to echo Brunswick County, Pender County, Cape Fear Public Utility and Fayetteville PWC's objection to granting Fuquay-Varina an Inter Basin Transfer Permit.</p> <p>Conditions that affect availability such as low flow need to be considered.</p> <p>The U.S. Geological Survey is considering an update to the 1994 Giese and Mason Report "Low-flow characteristics of Streams in North Carolina". This report should be considered to provide more detailed data for communities to use in future planning.</p>			

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11/23/2020	Tim H. Holloman	Lower Cape Fear Water and Sewer Authority	Email	Scoping		<p>The Lower Cape Fear region is experiencing growth as well and does not support any action that reduces the available water supply to public water providers on the Lower Cape Fear. Lower Cape Fear Water and Sewer Authority, Brunswick County and Cape Fear Public Utilities already made significant capital investment to utilize the one hundred and six million gallon per day allocation already permitted.</p>			