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From: kathy wells <wordsmithlr@gmail.com>
Sent: Tuesday, December 13, 2022 1:19 PM
To: Water Draft Permit Comment
Subject: deny Paradise Valley development - application # AR 0053210 and AFIN # 60-0510
Attachments: pinnacle issue letter 2022 Why PV is reckless.pdf

Dear Loretta Carstens, P.E.
ADEQ

This proposal should be rejected for the likely harm that would be done to the waterways, the wildlife, the residents and the community around Pinnacle Mountain. Developer's revisions are inadequate.

These package plants are notorious for failure and neglect once a developer leaves oversight to owners.

This developer has a record of faulty obedience to ADEQ regulations over previous projects of his.

That's a Bad Actor. Put a stop to these offenses against the community.

Yours Truly,
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Paradise Valley's Sewage Facility is a reckless plan because:

- Contaminants & pollutants (such as raised levels of fecal coliform) will flow from the Paradise Valley sewage facility considering we are dealing with a documented "bad actor". In addition, hormones and pharmaceuticals that are flushed would not be removed during the treatment process and would be discharged from the facility.
- Contaminants & pollutants would be dumped into an unnamed creek bed that meanders and eventually connects to Mill Bayou.
- The creek bed and portions of Mill Bayou are dry or barely flow for several months of the year. This means that contaminants flowing from the sewage facility will collect and pool and become more and more concentrated.
- The concentrated contaminants would immediately impact aquatic life, animals and birds. Phosphorus levels will increase even more and would likely cause algae blooms (large areas of thick green algae) which can be toxic to humans and wildlife. More phosphorus = more algae = less oxygen in the water to impact wildlife. Once the contaminants are in the creek bed and Mill Bayou, treatment cost is prohibitive.
- The sewage facility can dump up to 50,000 gallons of sewer water daily into the unnamed creek and Mill Bayou for the initial phase of Paradise Valley.
- Planned future phases of Paradise Valley would require one or possibly two additional sewage facilities, each with the capacity to dump 50,000 gallons per day. That would mean the eventual capacity could be as high as 150,000 gallons being dumped daily - making Mill Bayou a sewer pipe to the Arkansas River.
- A significant archeological site in our community could be severely impacted by the sewage facility discharge into Mill Bayou. The site is already being impacted by flooding that is tied to excessive stormwater runoff from both Waterview Estates and Paradise Valley. This desecration should not be allowed.
- These types of "package" sewage facilities have a very poor track record for violations, which means that they exceed the allowed discharge levels of fecal coliform, phosphorus and other contaminants. Package sewage facilities are factory built, not site built, therefore backup systems and fail-safe systems are not included or those systems are often undersized.
- Package sewage treatment systems only function properly if constantly maintained. The same operator of the Waterview Estates sewage facility will also be the operator of the Paradise Valley sewage facility. The Waterview Estates sewage facility has had numerous violations. The operator will not always be on site at either facility.
- Operator error has caused many problems at package sewage facilities in Arkansas and surrounding states. The operator is typically not dedicated full time to package sewage facility operations (there are other competing business opportunities), which can lead to wastewater exceeding the facility's treatment capacity causing inadequately treated sewage to be discharged.
- A technical expert on these types of package sewage facilities has stated that the Paradise Valley facility will require daily screen cleanings and other maintenance / monitoring in order to achieve the facility's discharge limits for fecal coliform, phosphorus and other contaminants. Daily site visits by operators virtually never happens, as indicated by other similar facilities.

- When a sewage facility is exceeding (violating) its allowed limits, the operator typically applies additional chemicals to comply with the limits. These chemicals are in themselves a potential threat to the plant and aquatic life in the discharge waterway.
- The proposed Paradise Valley sewage facility has no safeguard for reducing phosphorus levels; therefore, high levels of phosphorus can be discharged, significantly increasing the probability of algae blooms. These can be dangerous for humans, livestock, wildlife and lethal to plant and aquatic life through the waterway.
- When flooding occurs, which is not uncommon during rainy periods or even after a heavy rain any time of the year, the concentrated pools of sewer water will be spread into yards, fields and ponds affecting people, livestock and wildlife.
- In the event the United States Army Corp of Engineers (USACE) requires the levee flood gates on Mill Bayou near the Arkansas River to be closed to control flood levels in Roland, the sewage facility discharge could potentially back up into yards, fields and ponds and potentially contaminate the groundwater.
- All existing homes in Roland and the surrounding areas utilize septic systems. Each property owner is responsible for the proper maintenance of their own septic system. Septic systems typically require a significant land area (typically a minimum of one to two acres). This has resulted in a low population density and no areas of concentrated sewage. The Paradise Valley sewage facilities will bring the sewage for over 400 homes to a single discharge point. Operator error or equipment breakdown could result in essentially raw sewage from over 400 homes being dumped into our waterway.
- These types of sewage facilities require adequate LONG-TERM funding for proper maintenance and operation. As the unit ages, maintenance costs will naturally rise. The developer's financial plan, as shown on the Arkansas Division of Environmental Quality (ADEQ) website, indicates an inadequate funding stream for the first 5 years of operation, and no financial information beyond the first 5 years. Documents filed by the developer indicate three different entities as the owner of the sewage facility. What kind of equipment breakdowns could occur in the next 10, 20 or 50 years? It is frightening to speculate. Sewage treatment should be the responsibility of dedicated sewage utility companies. The ownership situation for the Paradise Valley sewage facility is BAD PUBLIC POLICY.

The Paradise Valley Development is an irresponsible plan because:

- The planned Phase I development indicates 76 homes will be built. Phases II and III could increase the development to over 400 homes. The plans indicate the homes would be built very close together on small lots (16' between homes - 8' is minimum side yard setback – and the developer had asked for even smaller distances 5' and 6' setbacks for 50' lots and 60' lots respectively or 10% of the lot width, but the request was withdrawn by the developer when the planning board started having concerns the houses would be too close and so applicant decided to make the homes longer than wider that instant rather than decrease the number of homes with larger lots and withdrew the variance request.)
- This leap-frog urban development is completely out of character with Roland's rural community.
- Because the Paradise Valley homes are planned to be very close together, serious questions have been raised regarding the planned quality of the homes and building materials based on similar developments in central Arkansas by the same anticipated builder, and this potential "inferior build" could pose a fire danger to adjacent homes, therefore taxing the equipment available to firefighters. Firefighters could

also be in more danger due to the possibility of multiple fires at the same time due to the close proximity of the homes.

- There is inadequate infrastructure for a development of this magnitude. Traffic would increase significantly with the addition of each Phase of the development. Highway 300 is a narrow highway with little or no shoulders. There are many areas with limited site distance. There is basically one way in and one way out unless drivers re-route around the mountain, which is also a two-lane narrow highway.
- Increased traffic on Highway 300 would cause congestion and unsafe driving conditions impacting residents commute to and from work and/or school.
- Increased traffic on Highway 300 could seriously hamper emergency response time for medical or law enforcement assistance.
- The population of Roland in the 2020 census was 590 per World Population Review. Paradise Valley's Phase I projected population with 3 persons per household in 76 homes would add an additional 228 people. This would be equal to half of our existing population. With the estimated build-out of over 400 homes, the population would increase to 2 ½ times the current population.
- There are few jobs, hospitals, schools, grocery stores, restaurants, or entertainment establishments in Roland.
- A drastic increase in traffic, noise, activity, and lights would negatively affect the rural environment we cherish.
- Storm water runoff has increased dramatically due to diversion ditches built at Waterview Estates to prevent storm water from going into the Lake Maumelle watershed. Roland Cutoff and cross streets to Roland Cutoff have seen a significant increase in flooding since these diversion ditches were built. The additional flooding has caused problems with standing water, boggy ground, foundation problems, septic tank problems due to poor drainage, landscaping, etc. Residents have incurred expenses for expensive repairs and remedies attempting to resolve the flooding issues such as French drains, rock work to help redirect the excess water, etc. Since the 20 acres was clearcut for Paradise Valley, the flooding has become significantly worse.
- Recreation activities would likely be severely impacted with the proposed development:
 - Fishing – Potential impact from contamination caused by effluent from the proposed sewage treatment plant could present a health risk if you eat contaminated fish. Algae blooms will cause a severe drop in the oxygen levels in the water suffocating fish and other aquatic animals.
 - Hunting – Deer and turkey do not normally frequent high density areas due to the noise, light, and activity. They would leave the area for less populated areas.
 - Swimming & wading – Water quality concerns and the potential contaminants from wastewater and/or chemicals could make swimming and wading a health risk. Young children love to play in creeks. Parents may have to ban their children from one of the joys of country living.
 - Kayaking and/or canoeing – Irregular water flow, increased algae blooms, unpleasant odors and unhealthy plant and animal life could cause health issues and would make life less enjoyable.
 - Hiking – Many of the current hiking trails would be very near Paradise Valley, which would diminish wildlife sightings, as well as the peace and tranquility of being away from civilization.
 - Birdwatching – Nesting areas are disturbed or destroyed by dense development. The birds would leave the area.
 - Bicycling – numerous bike races are held annually in the Roland area. Individual bikers frequently ride through the area. The increased traffic congestion would pose greater risk to bikers and not to mention the fumes from the open-air sewage facility.