

Koon, Nancy

From: Roger Henley <1951henleys@gmail.com>
Sent: Tuesday, April 5, 2022 11:08 AM
To: Water Draft Permit Comment
Subject: Public Comment to Deny Paradise Valley Wastewater Treatment Plant
Attachments: PMCC ADEQ Public Comment Letter.docx

Please see my attached letter requesting denial of the proposed Wastewater Treatment Plant on Roland Cutoff Road.

Thank You.....Barbie Henley

March 19, 2022

Faizan Khan Permits Branch
Office of Water Quality
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: Discharge Permit Number AR0053210, AFIN 60-05010
Paradise Valley sewage treatment facility on Roland Cutoff Road, Roland, AR

Dear Mr. Khan:

I am asking you to please DENY the proposed sewage treatment facility noted above. Due to the complexity of the issues related to this proposed facility, I would greatly appreciate a public hearing to discuss the issues.

We moved to our home in Roland, Arkansas in 1997, almost 25 years ago. We specifically chose this area for our home for our retirement home because we value and appreciate a natural environment and enjoy coexisting in harmony with nature. We were both still working at that time and our families live in and around Little Rock, so we wanted to live close by, but live in the country. Only 4% of the land in Pulaski County remains forested so choices were limited. We appreciate that change is inevitable, but irresponsible development is irreversible. The proposed Paradise Valley and a sewage treatment plant is irresponsible development that will change our community without regard to the destruction caused to the environment, the ecosystem, the wildlife and, most importantly the families who have made this their home. We support and welcome responsible development that demonstrates appreciation of the natural environment and protects the area potential hazards of an urban development in a rural setting.

A large-scale development like Paradise Valley offers nothing positive to our rural community. The Phase I plan is to build 76 tract homes on 20 acres with additional Phases up to 600 homes. This type of "leapfrog" development could destroy our historic community. The sewage treatment facility would be located immediately behind my neighbor's home. If Phase I is allowed and there are two residents per household, using an average of 100 gallons of water daily would equal 5,548,000 gallons of treated waste being flushed into Mills Bayou yearly. Mills Bayou is a waterway through our community that empties into the Arkansas River. Mills Bayou is sometimes dry, often stagnant, and prone to severe flooding issues especially during heavy rains. Expansion of the sewage treatment facility would be necessary to accommodate the massive volume of wastewater as additional Phases reach build-out. These facilities are known to have many negative issues and are notorious for code violations due to their operators. The Environmental Protection Agency recommends operators be on site three to four hours daily, however records indicate operators spend one hour or less, and often do not visit the sites for several days in a row. Since operators are often not at the facility for extended periods of time, facilities can release improperly treated wastewater containing dangerous levels of contaminants and pollutants into the water that goes undetected. To resolve issues with the release of improperly treated wastewater, more chemicals are added, which could be as detrimental to the ecology of the waterway as the pollutants themselves. Prepackaged facilities are noted to have equipment failures due to improper operation and maintenance, again allowing massive amounts of dangerous pollutants to be dumped into the waterway. Even "treated wastewater" contains nutrients like phosphorus that can choke waterways with algae and deprive the water of oxygen which can kill fish. The sewage treatment facility indicated for Paradise Valley has no phosphorus control which could cause serious issues for the aquatic animals

living in Mills Bayou. Mill Bayou is a source of drinking water for domestic animals and various forms of wildlife, which could be affected by the contaminated water. We also have additional concerns of unpleasant odors.

We are already experiencing significant flooding issues due to storm water since Waterview Estates added drainage ditches to channel storm water away from the Lake Maumelle water basin the Mills Bayou water basin, which is our community. Central Arkansas Water would not allow a sewage treatment facility or the storm water runoff from a development to flow into the Lake Maumelle water basin as it is a primary source of drinking water. Was consideration given at the time, to the potential effects the storm water runoff could cause for Maumelle Water Corporation wells, which supplies our drinking water?

Unfortunately, Mills Bayou already has a sewage treatment facility owned by the same developer on Mills Bayou within a couple of miles of this proposed facility for Waterview Estates. Waterview Estates sewage treatment facility has had multiple code violations since being put into operation. The history of this prepackaged sewage treatment facility demonstrates the owner of the facility has a long history of improper operation and maintenance of a sewage treatment facility. Two facilities on the same waterway, controlled by the same "Bad Actor" that flows through pastureland, behind homes, through farmland and meanders through forested areas on its way to the Arkansas River causes great concern. Mills Bayou would simply become a sewer pipe to the Arkansas River.

There is inadequate infrastructure in our community to accommodate a densely populated development with a prepackaged sewage treatment facility. A volunteer fire department is responsible for covering our area in the event of fire or medical emergency. They are very capable and serve us well, however an urban development of this size could jeopardize the safety of the firefighters as well as tax their ability to be to serve the community in a timely manner should there be more than one event at any given time. With the density of the proposed Paradise Valley, it is highly likely a single fire could easily involve more than one structure quickly, overwhelming the firefighters and their equipment. A situation like this would endanger the firefighters in addition to the community. The Pulaski County Sheriff's Department is our source for any police intervention that might be necessary. While they also serve us well, they are not located in our community, so response time varies significantly. With the addition of a densely populated area, the likelihood of more emergency situations is anticipated. We have no hospitals, no schools, and no jobs in our community which will mean a significant increase in traffic on Highway 300, which is a winding, two lane highway with no shoulders. It is an extremely popular route for bicyclist, including planned events like the Big Dam Bridge race. There are already instances of congestion on Highway 300, causing some drivers to become frustrated and pass vehicles in unsafe areas. The addition of several hundred vehicles would exacerbate the problem potentially leading to serious vehicle accidents. If Highway 300 should be closed for any reason, all traffic would have to detour through Little Italy and Wye Mountain to reach Highway 113 to loop back to Highway 10. This is another narrow, winding route through rural areas that are also inadequate for high density traffic.

I deeply appreciate your consideration my concerns as you make decisions regarding the proposed Paradise Valley Development and its sewage treatment facility. It will cause undue hardship to our daily living, physical changes to our property, increased taxes, increased driving time, disturbance to our wildlife and irreversible change to our quiet country environment. Whatever decisions you make today will have lifelong impact on my family, my community, our environment, and future generations.

Sincerely,

Barbara and Roger Henley
22624 Roland Cutoff Road
Roland, Arkansas 72135