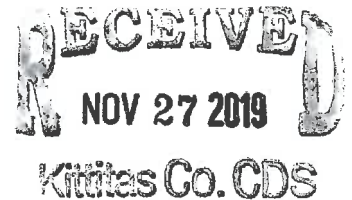


Kittitas County Community Development Services
411 N Ruby St, Suite 2
Ellensburg WA 98926
Attention: Chelsea Benner

November 25, 2019



RE: Love's Travel Stop SEPA (SE-19-00014)

Dear Chelsea,

The following are my comments on the above referenced SEPA Environmental Checklist. This document contains erroneous information, vague and incomplete information. The Traffic Impact Analysis contains many errors and does not put forth the image a professionally prepared document. To put it honestly the person who prepared it does not demonstrate the ability to read a map. Close scrutiny of this report, by CDS and Public Works, should be in required.

Thank you,
Marge Brandsrud
PO Box 638
Easton, WA 98925
dmbrandsrud@comcast.net

A Background

10. Given the quantity if cut and fill material propose a grading permit will be required. Kittitas County Health Department will require a permit for the onsite sewer system. A driveway permit will be required. WA Department of Labor and Industries will require an electrical permit for all electrical installations at the proposed facility. A storm water permit will be required. A permit for the installation of proposed propane tank or tanks will be required

B Environmental Elements

2. Air

a. The types of emissions to the air occurring after construction is complete concerns me. The air quality is often diminished (especially during winter months) in the Easton area due to inversions which trap pollutants at the surface. Often wood smoke causes unhealthy conditions before a burn ban is put in place. It is likely that at least a portion on households burning wood for heat have on other source and continue to burn. The concern here being the trucking industry generally uses diesel fuel which is well known to emit large amounts of harmful particulate matter. Federal law and scheduling require truck drivers to rest and be off duty for hours or hold in place for load delivery or pick up. During these long hours of parking most trucks do not turn of engines. These drivers need to use heat, air condition and possibly refrigeration units for cargo. I would propose a requirement that engines be turned off at all times when patronizing the proposed facility. Many travel centers have parking stations that allow overnight or hours long stays by providing no-idle electrified parking spaces. Providing these types will

reduce the carbon foot print of the proposed facility. Any requirement to control or reduce the carbon foot print of a proposed industrial development especially in an area which is subject to frequent seasonal air inversions should be seriously considered.

3. Water

b. Ground Water

1) Please require a signed contract with the water district and approval from Washington Department of Health.

2) I believe the answer to this question requires additional information. The question asks about septic tanks and other sources. Other sources include treated storm water which can include petroleum products, antifreeze, human and animal waste de-icing chemicals and other substances considered hazardous. This question also asks for a description of the general size of the system. The applicant has provide no information regarding the size of the septic or storm water treatment system. Although I understand the proposal does not include houses this question does asks for the number of humans or animals the systems are expected to serve.

c. Water runoff (including stormwater)

1) The answer to this question requires additional information also. There is no statement describing the source of runoff or the method of collection and stated treatment. I also believe there should be an estimated quantity included. The fact that 74% of the proposed development will be impervious should require some detailed estimates of septic and stormwater quantities to be infiltrated in to the remaining 26%.

2), 3) Stormwater runoff in the Easton area can be a problem during times of snow melt and can cause flooding and standing water if the system is not designed adequately. Inadequate control of stormwater on such a large impervious area could cause local flooding and possible runoff on to abutting properties. Untreated runoff could likely contain large amounts of commercial de-icer and snow melt chemicals. Any petroleum products and other hazardous materials which may have been deposited over the winter months when detecting, containing and cleanup of would also by pass any treatment process and be deposited in unintended areas.

5. Animals

a. Additional birds should include - pelated woodpecker, northern flicker, red headed woodpecker, crow, raven, dove, swallow, dark eyed junco, gross beak, thrush, humming bird, finch, bantail pigeon, nut hatch, osprey, +++.

Additional mammals should include – skunk, raccoon, vole, goffer, bob cat, coyote, Douglas squirrel, cougar, California ground squirrel, bat, rabbit, chipmunk,

7. Environmental Health

a. Information provided in response to this question is much too generic. Gasoline, diesel, motor oil, other lubrication products used for truck lube/oil services and anti-freeze are hazardous materials as well as fire and explosion hazards. The storage and disposal of hazardous collected during truck lube/service operations and spill cleanup must follow Federal, State and County regulations. Language

supporting and citing regulations and codes should be included in approval of this application. Oil or fuel spill response procedures manual and documented employee training are highly recommended.

a.)3 The information provided here is incomplete. Given the description the description of operations provided in 7.a. additional hazardous materials will be present during the life of the operation. Those hazardous materials will also include, waste oil, used antifreeze, possibly contaminated diesel and gasoline, used lubrication and fuel filters, grease rags, brake dust, lubricating materials, chemical based cleaning products and other products that must be treated as hazardous and have safety procedures in place for proper containment and disposal.

a.4) The response "no special emergency service requirements are anticipated" is a bit too optimistic to believe. Local emergency services are limited in Easton. The County Fire Marshal, Fire District 3 Public Works and WSDOT are best suited to provide a clear picture of the challenges in providing emergency services to the Easton community. It must be kept in mind that access to the Easton community is clearly limited. I 90 is the only access to Easton. In the event that either the Exit 70 or Exit 71 access were to be impaired access to part of Easton would not be available at all. Given the fact that Fire District 3 equipment is on the south side of I 90 and the only access to the north side of I 90 is across the Exit 70 and Exit 71 overpasses. Further complicating the situation is the Yakima River which does not allow access from Exit 71 to the northwest area of Easton where the proposed operation is located. That access is only from Exit 70. The Yakima River also does not allow access to the northeast area of Easton. This may be confusing to anyone not familiar with the Easton community, but a close look at the County map will clear up that confusion. Access to timely emergency services is vital to public health safety and welfare. That access is currently impaired at times when winter weather or traffic accidents close I-90. The Easton community becomes isolated and traffic from I 90 floods the only roads in Easton. There is very limited parking available and only a couple of sanitary facilities which become over used and have in the past disrupted the septic systems. There are no shoulders on the road on the north side of I 90 and limited shoulder parking on the south side of I 90. Traffic from I 90 simply parks in the travel lanes of the roadway ignoring the NO PARKING signs posted along E Sparks Road. Traffic will also park on the I 90 over pass at Exit 70 and continuously block access to local residents and emergency services. Fire District 3 which serves the Easton community is a volunteer department and many volunteers live on the north side of I 90. At times when traffic from I 90 blocks the local roadways it is impossible for fire and medical services to operate and provide possible life saving services. The design and approval of the proposed operation must make health safety and welfare a priority.

b. Noise

2) Long-term noise will include sources in addition to trucks and autos entering and leaving the truck stop facility. Noise emitted by tools used in the operations of tire changing and oil/lube services will produce a higher decibel noise level than the coming and going of trucks and autos. Additional noise will be emitted from air compressors, refrigeration, heating and cooling equipment, exterior speakers for the drive through food operation and other sources.

3) There are no proposed mitigations offered for long term noise emissions. Night time noise emissions must be limited. Tire and service work areas must not be allowed to operate during night time hours. Although the proposed truck stop is zoned properly, neighboring parcel uses include residential, a

campground and a bed and breakfast facility. The Easton community is a rural area and placing a facility such as a truck stop is going to be met with considerable opposition. Mitigations for noise, traffic, emergency services and visual esthetics are essential.

11. Lighting and Glare

b. Refer to County Code WSDOT Aviation and FAA rules regarding lighting requirements in areas near airports.

12. Recreation

a. Additional recreation opportunities include many organized equestrian, motorcycle and snowmobile events most of which are held at Silver Ridge Ranch which directly abuts the proposed truck stop property. Silver Ridge Ranch has been a part of the Easton Community for many years and includes a campground, horse pasture and bed and breakfast. There is also a private campground which directly abuts Easton State Park. There are also a number of groomed snowmobile trails, a snow park and the John Wayne State Park Trail.

14. Transportation

a. In answering this question the applicant has made incorrect statements which baffle me. Upon further investigation I observed the same errors in the Traffic Impact Study. I would be hesitant to accept or relay on information in that document. Lake Easton Road is within Lake Easton State Park and does not serve as a route to the proposed truck stop or access to I 90. The proposed access to the project may in fact be from E Sparks Road. The divide between East and West Sparks Road is not clear looking at the County Assessors map. Public Works will have to clarify information regarding these issues.

f. The number of additional vehicle trips projected is monumentally more than current volumes experienced at that intersection. The question which asks what percentage of the volume would be trucks is not answered.

h. Proposed measures to reduce or control impacts are very vague and absolutely inadequate. Mitigation to assure safety and acceptable traffic flow is essential to public health safety and welfare. Kittitas County and WSDOT must work to require proper mitigations before this proposal is approved.

15. Public Services

a. When an estimated 8,600 vehicle trips per day are added to the current trips per day there will certainly be an increase in the need for services. There are less than 500 residents in the Easton community. An additional minimum 8,600 (if each vehicle only contains 1 person) in addition to employees of the facility will increase those served by public services substantially. When there is an estimated 170% in citizens to be served it would be irresponsible to assume there will be little need for additional public services.

16. Utilities

b. Power will likely not be provided by Kittitas PUD. Power is currently provided to the Easton Community by Puget Sound Energy. I would suggest an inquiry regarding the intention to provide

internet to the facility. Internet service to the Easton is currently not what would be expected by a company that will use it in many of its daily operations as well as providing public access to its patrons.