

## Chelsea Benner

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**From:** Johnson, Deborah L (DOH) <deborah.johnson@doh.wa.gov>  
**Sent:** Friday, November 15, 2019 3:53 PM  
**To:** Chelsea Benner  
**Cc:** Smits, Brenda M (DOH); Mau, Russell E (DOH); wrightp@wsdot.wa.gov; elkhornanderson@gmail.com; eric@sunriseresorts.com  
**Subject:** Comments- SE-19-00014 Love's Travel Stop (SEPA #201906514)

Hello,

Thank you for the opportunity to review and comment on the [SEPA consultation](#) for the proposed Love's Travel Stop facility at Easton. We have the following comments on the project:

The current Kittitas County CAO states that "No critical aquifer recharge locations have been identified in Kittitas County" (KCC 17A.08.010). Wellhead protection areas are listed under critical aquifer recharge areas in the CAO (KCC 17A.08.025), but the listed cross-reference is to a section regulating the placement of new drinking water wells (KCC 13.20.040). It does not address protections for existing drinking water supplies as new development occurs within wellhead protection areas. The County has had a CAO update in the pipeline for some time now, & it's our understanding that the latest draft (Nov. 2018?) would designate wellhead protection areas as a form of critical aquifer recharge area, consistent with [WAC 365-190-100\(4\)\(b\)\(iii\)](#). At this time, the SEPA checklist is correct in indicating no identified critical aquifer recharge areas (Q. B.8.e).

Please be aware that a small portion of the site is overlain by portions of two wellhead protection areas associated with the following Group A public water systems:

Easton Water District, 10-year time of travel, Source #2, Well #2 AFT391 (Village)

Lake Easton Resort, assigned time of travel, Source #1, Well #1 AFL866



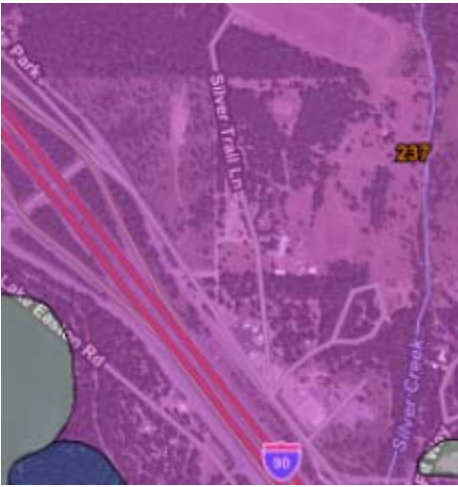
Map source: <https://gis.co.kittitas.wa.us/compas/default.aspx?pid=778834>  
<https://fortress.wa.gov/doh/swap/index.html>

Map source:

Additionally, NRCS shows a hydrologic soil group rating of “A” for this entire area, indicating highly permeable soils.

237=Kladnick ashy sandy loam, 0 to 3 percent slopes

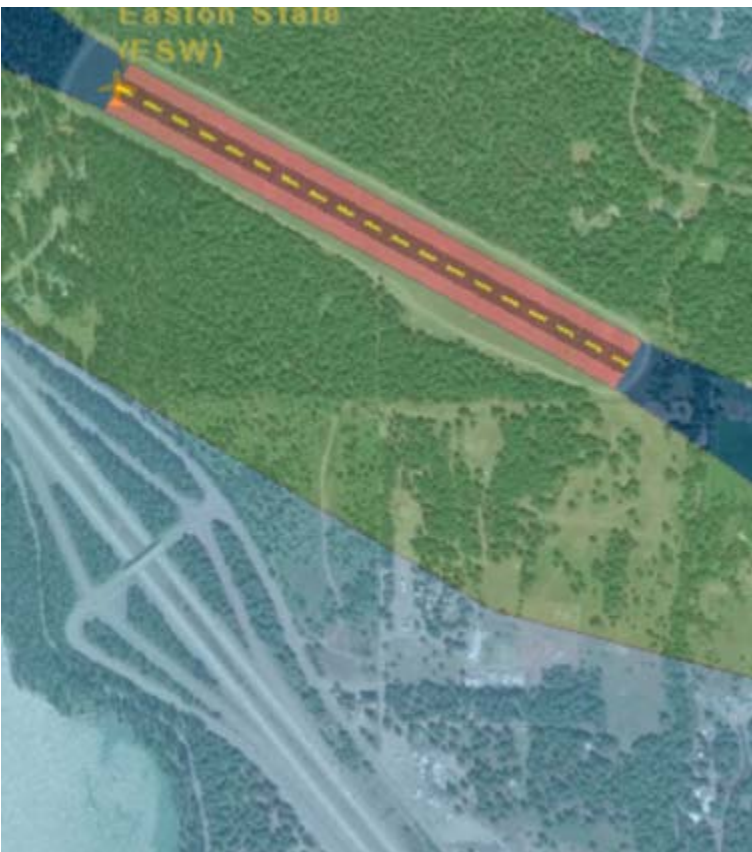
Group A. Soils having a high infiltration rate (low runoff potential) when thoroughly wet. These consist mainly of deep, well drained to excessively drained sands or gravelly sands. These soils have a high rate of water transmission.



Map source: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

By its nature, a Love's facility involves underground fuel tanks, on-site fueling, a large impervious surface field, & the probability of petroleum waste in surface water (noting that stormwater infiltration is proposed). The SEPA checklist indicates a collocated tire shop but does not mention the commercial truck oil change facilities found in some locations. It appears that Love's tire shops also routinely include [other maintenance facilities & services](#). It isn't clear whether [retreading](#) is proposed on site. The SEPA checklist also indicates the use of a large on-site system which, depending on siting & maintenance, can potentially pose wellhead protection concerns. As development review progresses, please give appropriate regard to the need for wellhead protection in this area irrespective of critical area applicability.

As an additional public health & safety consideration, please also note that the site is bisected by the transitional (green) & horizontal (light blue) surfaces associated with the Easton airport. This is not within DOH's purview; please contact WSDOT Aviation to identify any land-use restrictions this may pose. Their planner, Patrick Wright, is cc'd here or call 360-709-8019.



Map source: <https://www.wsdot.wa.gov/data/tools/geoportal/?config=airport>

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This concludes our comments. Please let me know if you have any questions or need additional information.

For distribution of future SEPA notices, please note that our email is [SEPA.reviewteam@doh.wa.gov](mailto:SEPA.reviewteam@doh.wa.gov). Please also send notifications to our regional planner for your area, [Brenda Smits](#) (cc'd here).

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