



Board

Christine Andreae
Warren County

Eddie Bumbaugh
Augusta County

Joan Comanor
Shenandoah County

Sarah Francisco
Augusta County

Lee Good
Rockingham County

Christine Hartman
Warren County

Lisa Anne Hawkins
Rockingham County

Joe Lehnen
Shenandoah County

Carolyn Long
Shenandoah County

Brent Trumbo
Rockingham County

Robert Whitescarver
Augusta County

July 1, 2022

Dear Members of the Rockingham County Planning Commission,

On behalf of Alliance for the Shenandoah Valley, a non-profit conservation organization working to ensure clean water, working landscapes and vibrant rural communities in the Shenandoah Valley, I would like to submit comments regarding the proposed Gas City LLC rezoning.

A truck stop to include a 10,000-sf convenience store, 12 car fueling positions, 8 diesel fueling positions, and a single 2,000 square foot fast-food restaurant, as proposed, would have significant impacts to the environment and rural character not only to the surrounding communities but throughout the wider region. Specifically, our concerns include:

- **Incompatible with the Comprehensive Plan:** As staff acknowledges in its report to the Planning Commission, “this property is *designated as Agricultural Reserve* in the Comprehensive Plan, and is *not located* within an urban growth area.” The Planning Commission’s primary charge is to evaluate proposals for compatibility with the Comprehensive Plan. This proposal falls at the first hurdle.
- **Incompatible with tourism:** Again, quoting from the staff report, “*Tourism also relies in part on resources that cannot be created such as scenic beauty.*” The suggestion that converting 31 acres from agriculture to a truck stop can provide the traveling visitor with scenic beauty is far-fetched. Tourists don't visit an area to see truck stops. The types of services compatible with a healthy local tourism economy as envisioned in the Comprehensive Plan are smaller

scale local services with individual character. A truck stop can never meet this objective. No one seeking rural scenery and experiences would call a truck stop beautiful. On the contrary, this proposal is a degradation of the environment needed for tourism to flourish.

- Additional trucking infrastructure isn't needed in this location: Data gathered during the development of VDOT's Interstate 81 Corridor Improvement Plan showed that the segments of I-81 in need of additional parking and facilities were south of Roanoke and not in the northern Shenandoah Valley. These findings are unsurprising when one considers the already existing Liberty "Travel Station" across from the proposed site, the Pilot Travel Center just seven miles south at Exit 251 and the truck stops found just south in Augusta County.
- Reverse long-time water quality improvements: Just down the hill from this site is Smith Creek, a major tributary of the North Fork of the Shenandoah River. As a national showcase watershed, Smith Creek has been the focus of more than a decade of effort by farmers and conservationists, working cooperatively to restore local water quality. A proposal of this scale, with significant areas of impervious surface and polluted run-off, threatens to setback the significant investment made by farmers and other community members over many years.
- Lack of public services: The expected water and sewer usage of a proposal of this scale with a truck wash, restaurant and other facilities make it irresponsible to approve without access to public water and sewer. The large commercial scale as well as the possibility of fuel spills risk both the quality and quantity of the water for neighboring residents.

We ask that you prioritize the interests of local citizens and recommend denial of the Gas City LLC rezoning request.

Sincerely,

Kim Sandum, Rockingham County Coordinator
ksandum@shenandoahalliance.org