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August 16, 2022

Dear Members of the Rockingham County Board of Supervisors,

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 am writing to submit comments regarding the Gas City LLC rezoning request and special use permit (SUP).

A rezoning to allow the large-scale, heavily trafficked truck stop proposed by Gas City LLC, would have significant negative impacts on the environment, traffic, and rural character to the local community and throughout the wider region. We believe the risks to local citizens and the detriment to the county far outweigh any benefits of this rezoning.

Below, we outline our concerns about this project and reasons for why the rezoning request and contingent SUP should be denied.

I. This is an environmentally sensitive area

The proposed project is located less than 1/2 mile directly uphill from Smith Creek, a major tributary to the North Fork of the Shenandoah River and a designated National Showcase Watershed. The Smith Creek watershed is a major source area of drinking water for surrounding communities, including the downstream towns of Strasburg (population 6,600) and Woodstock (population 5,210) and the City of Winchester (population 27,900) and lies within a USDA National Water Quality Initiative source water protection area. Furthermore, Smith Creek provides source water for this highly productive agricultural region of Rockingham and Shenandoah counties and habitat for eastern brook trout—the only trout native to the Shenandoah Valley.

While Smith Creek is an important and sensitive resource, it is already officially designated by the Virginia Department of Environmental Quality as impaired for high levels of bacteria and sediment. Extensive efforts by farmers and conservationists to restore water quality over the last 12 years, supported by significant investments from state and federal programs and conservation agencies, report significant water quality improvements. The increased runoff and potential pollution created by the proposed large-scale, heavily trafficked truck stop located less than 1/2 of a mile from Smith Creek would negate much of the time, money, effort, and resources that have been dedicated to this restoration effort and result in a massive step backwards in improving the water quality of Smith Creek.

The United States Geological Survey (USGS) has monitored Smith Creek since the 1970's and a 2016 report states that the creek is fed primarily by groundwater springs. This is a result of the area's extensive karst geology. Karst systems, often described as Swiss cheese below the ground, have many direct connections between surface and ground water in the form of caves, springs, and sinkholes. This means that a spill and other pollution events near Smith Creek quickly reach the groundwater that supplies the wells of many homes and agricultural operations in the watershed.

The fact that the proposed property overlays karst geology is evidenced by the USDA Soil Survey Geographic Database that classifies 75% of the underlying soils coming from limestone parent material. Furthermore, the Virginia Department of Energy Division of Geology and Mineral Resources identifies a sinkhole on the property boundary. Increased runoff from a large, paved area, such as a parking lot for a truck stop, funnels through or along karst features and dissolves the underlying limestone, increasing the likelihood that new caves, sinkholes, or springs are created. Additionally, the Swiss-cheese nature of the area's karst geology creates increased potential for more extensive channeling of surface water run-off and other spilled fluids into the existing water supplies during rain events, raising the risk of groundwater contamination.

While the site would need to comply with Virginia's stormwater management program, there would still be water quality impairment from the truck stop runoff. The stormwater program requires the use of on-site best management practices (BMPs) to treat polluted runoff. However, these BMPs are not 100% effective, especially compared to the site's undeveloped conditions. According to Virginia's Runoff Reduction Method, stormwater BMPs range from 0% to 75% effective at removing phosphorus from stormwater runoff. Some, but not all BMPs, are also able to reduce runoff volumes. This means that the net effect is a sure and steady increase in pollutants and also runoff volumes. This situation is made worse if the applicant decides to take advantage of off-site nutrient credits for some of the site's stormwater compliance.

II. There is no public sewer at this rural location

The proposed truck stop would require a package plant to handle the wastewater generated. These types of package plants require trained on-site operators and monitoring, without which these systems are prone to mismanagement and failure. Truck stops, such as the one proposed, must also be equipped with on-site capacity to separate oil and water, be capable of recycling fluids, and have a system for handling hazardous spills. Poor performance of a package plant at this site would be particularly consequential, considering its proximity to Smith Creek and

connection to the surrounding groundwater. Over time, the proposed truck stop could discharge nutrient pollution and heavy metals into a sensitive resource that is already impaired, offsetting the tremendous efforts of county farmers, monetary investments by state and federal agencies, and gains in agricultural practices toward the restoration of Smith Creek.

The amount of wastewater generated by a truck stop is significant. The truck stops located at Exit 291 in Toms Brook in Shenandoah County generates an estimated 25,000 gallons/day of wastewater, according to the Toms Brook-Maurertown Sanitary District which manages wastewater from the truck facilities. This is roughly the equivalent use of an additional 300 residents at the site, based on the EPA estimation that a person creates 80 gallons of wastewater a day. It is our experience that Rockingham officials would not be favorable to adding 300 new residents in an environmentally sensitive area without access to public water and sewer and therefore should not do so for a truck stop.

In addition, there would be a troublesome precedent set by approving a package plant system at this location. We are aware that the nearby Liberty Station, a much smaller facility than the one being considered for this site, is on a package plant. Approval of multiple package plants could make it more difficult and legally risky for the county to deny incompatible package plant proposals in the future.

Clearly, wastewater from large-scale commercial uses, such as from the proposed truck stop, should be managed at a site with access to public sewer. This is the case for several of the nearby large-scale commercial truck facilities located along the I-81 corridor in the Valley.

III. Impacts to rural character matter in Rockingham County

Tourism and agriculture are leading economic sectors in Rockingham County. Quoting from the staff report submitted to the Planning Commission for the rezoning, "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. A truck stop can never meet this objective. Tourists don't visit the Shenandoah Valley to see truck stops. 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. A large-scale, high intensity commercial operation doesn't align with the type of service (small scale, local, with individual character) the comprehensive plan envisions as compatible with a robust local tourism economy.

In fact, neighbors in the Mauzy area value the rural character so much so that they asked the county to down-zone their property to agriculture.

The impacts of 24-hour light, noise, and increased traffic will forever change the character of this rural area, paving the way for future industrial use. The attached letter from former Augusta County Supervisor and Alliance for the Shenandoah Valley contractor Nancy Sorrells describes the severe impacts of the Pilot truck stop in Greenville at I-81 Exit 213. She cites water quality issues both in the heavy water use and contamination from run-off, an "incredible amount of unsightly litter," traffic congestion and accidents, pavement failures, constant idling of trucks that

creates air quality issues (resulting in nearby residents needing to power wash their houses on a regular basis because of road grime), and an increase in fire, rescue, and law enforcement calls. She also states that the truck stop and its associated issues are a barrier to new businesses whose customers don't want the hassle of dealing with the truck stop.

In contrast, maintaining services to agricultural land comes with low cost and substantial benefit to the county. Open working lands are the necessary context for tourism and agriculture. According to an analysis completed for Rockingham County's solar committee, the county's agricultural land generates an average \$2,000/per acre in annual revenue. Agricultural land doesn't require the expense of roads, police, and fire and rescue that commercial development does while contributing to the high quality of life that Rockingham County residents value and enjoy.

IV. Inadequate Traffic Planning

Although the Traffic Impact Analysis (TIA) submitted by the applicant states that there is no need for additional traffic lights or other traffic calming measures at the entrances of the proposed development, it is hard to understand how these would not be needed. A full 84% of car traffic and 95% of truck traffic visiting the site are expected to make a left turn out of the development, according to their report. The only accommodation recommended in the TIA is right turn lanes into the development. We believe further study and analysis is needed to gauge the traffic impacts of a large-scale commercial development at this site.

V. Inconsistency 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." We believe this proposal is not consistent with the Rockingham County Comprehensive Plan. Starting simply with the county's vision statement, it's clear that this rezoning and SUP are out of step:

In the year 2020 and beyond, Rockingham County will become an even better place to live, work and recreate for its residents and for visitors. The County will retain the essential historic attributes that make it a great place, including the clean natural environmental resources, the beauty of the farmland and mountains, the harmonious relationship between agricultural and residential land uses, the balanced and vibrant economy and the diverse yet harmonious society with many different cultures. Rockingham County will allow for healthy, managed growth while protecting and capitalizing on the assets which have encouraged people to come here in the first place. The actions of citizens and businesses of the County will reflect our understanding that we do not "own" the land; rather we only borrow it from our children. The County will be a place where our children can live and enjoy the same and better quality of life that we have enjoyed.

Here, it is clear the county's iconic landscapes, farmland, and clean environment are of paramount importance. A large-scale truck stop with extensive pavement, lighting, traffic, and their associated impacts, is at odds with this vision. The traveling public is well served by truck

stops and travel amenities at multiple locations along Interstate 81 and degrading the environment and rural character at Mauzy is not justified.

The land is currently in the Agricultural Reserve in an area of Rockingham County that is very important for agriculture. Nearly half of the 67,000-acre Smith Creek watershed is in agricultural use, with approximately 500 agricultural operations. A recommendation for approval of this rezoning would be inconsistent with the comprehensive plan's emphasis on preserving intact blocks of farmland.

Furthermore, the comprehensive plan makes it very clear that any "pattern of new development should reflect the county's success in achieving controlled, orderly growth." It continues:

The County will have maintained its rural, agricultural nature by directing new development to areas in or near existing towns and communities served by public water and sewer, and by curtailing development in rural areas served by private wells and septic systems.

New developments will be community friendly, with mixed-use centers and open space in and around them. These new developments will be relatively small scale and interspersed with plenty of open land and recreational areas, transitioning to open farmland and blending into the surrounding rural environment.

Again, this proposed project is not located near any existing towns. Approving the rezoning to allow the truck stop in an area that not served by public sewer and water is at odds with the spirit and the language of the comprehensive plan.

For these reasons, and others you are likely hearing from concerned citizens in the county, we urge you to deny this rezoning request and contingent SUP.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Kim Sandum". The signature is written in a cursive, flowing style.

Kim Sandum, Rockingham County Coordinator
ksandum@shenandoahalliance.org

Attachments:

July 27, 2022 Letter from Nancy Sorrells

Submitted to Rockingham County Planning Commission

July 27, 2022

Nancy Sorrells, Former Augusta County Board of Supervisors and Alliance for the Shenandoah Valley contractor

My name is Nancy Sorrells and I live near Greenville, VA in Augusta County. In 1999, I became involved in a community group formed to stop a truck stop (Pilot) in Greenville. We were unsuccessful, but what I learned about comprehensive plans, water, sewer, land use, zoning, etc. caused me to run for and be elected to the Augusta County Board of Supervisors. I served from 2004-2012 (two terms). I spent all eight years of my time on the board dealing with myriad issues resulting from that ill-planned truck stop. I am writing in hopes that you will consider these issues and use them to deny this application.

Here are some of the many problems that you and your community will face if this truck stop becomes a reality:

1. Water quality issues both in the heavy water use and in the contamination resulting from the drippings coming off the trucks and potential fuel drippings and leakage as well as the incredible amount of unsightly litter.
2. Traffic congestion and accidents will create continuous problems for the local community traffic. Not only will a truck facility bring a huge amount of interstate traffic that will be mixing with local traffic, but consider what happens when accidents or bad weather force traffic off the interstate. The result is not only frustrating and stressful for the local community, but creates unsafe driving conditions.
3. Infrastructure issues. First, such a facility should be on public water and public sewer. Period. Second, there will certainly be road infrastructure needs -- pavement failures at a high rate, perhaps more traffic lights needed, road widening, etc. We have dealt with all of those and continue to deal with all of those.
4. The constant idling of trucks creates air quality issues. People in close proximity have to power wash their houses on a regular basis because of the grime on their houses.
5. A significant increase in fire, rescue, and law enforcement calls.
6. Local business implications -- A truck stop and its associated issues makes it difficult to bring in local businesses whose customers don't want the hassle of dealing with the truck stop to get to the local business.
7. Finally, consider whether a truck stop is going to improve or diminish the quality of life for the community. Is it compatible with the county vision set forth in the county's comp plan?

I know that I do not live in Rockingham County, but the situation is so similar to what we have experienced here in Augusta that I wanted to reach out to you. I would be glad to answer any questions you might have. You have my phone number and email at the top of this form. Feel free to contact me.

Sincerely,

Nancy Sorrells-- recovering member of the Augusta County Board of Supervisors! :)

Greenville, VA