

From: Karen Tvedt
Sent: Wednesday, July 15, 2020 1:58 PM
To: maya.teeple@co.thurston.wa.us <maya.teeple@co.thurston.wa.us>
Subject: LWVTC-Comments on CP-11 Recycled Asphalt Policy

Thurston County Planning Commission
Re: Concerns re Comprehensive plan Docket Item CP-11

Dear Commissioners:

The League of Women Voters of Thurston County (LWVTC) is a nonpartisan organization that does not support or oppose any candidate or party. That being said, LWVTC does take positions on issues. LWVTC promotes a healthy and clean environment and sound land use planning.

The LWVTC has concerns about Lakeside Industries' request that Thurston County amend the Nisqually Subarea plan to allow recycling of asphalt pavement (RAP) in mined-out gravel pits. Sound land use planning is planning for the long term. The current plan protects this valuable subarea. If a change is made to a plan, there should be some kind of change in circumstances triggering the need for such a change. As far as we can tell, there has been no change in circumstances regarding this issue. Making a change to an established plan simply because it has been requested is not sound land use planning.

The Applicant's proposal, even if warranted at some places in the Nisqually Subarea, is far too broad and opens up the entire area to RAP uses. A mined-out gravel pit is likely one of the worst sites to place such an activity, since RAP releases a number of harmful chemicals. As the Court of Appeals noted in its 2004 decision, on this very proposal, the soils on the site are very "porous." The Court decision describes the site as approximately two miles upriver from the Nisqually National Wildlife Refuge, home to numerous wildlife species and endangered salmon.

Moreover, the Nisqually subarea includes critical aquifer recharge areas (CARAs) and the McAllister Geologically Sensitive Area, which is a CARA. By definition, CARAs are vulnerable to contamination. We believe the science behind protecting CARAs supports no change in the current plan.

Finally, the County has elected to do a SEPA analysis on proposed changes to the comprehensive plan after the planning commission review. We believe SEPA analysis should be done at the earliest opportunity, and certainly before the planning commission makes its recommendation. The planning commission should know what the environmental repercussions may be while considering this request.

Thank you for considering our comments. Let us know if you have any questions.

Sincerely,
Karen Tvedt, President
League of Women Voters of Thurston County