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Dear Paul Schaefer and Louisa Bruce,

I am writing today to comment on a proposed project to build a gas station/mini mart on the southeast corner of 185<sup>th</sup> Ave. and West Union Rd. (Case File #L2000057). I cannot express strongly enough how opposed I am to the Washington County Land Use and Transportation Department allowing this project to proceed. My initial reaction upon hearing that such a project was even being considered was shock and disbelief that anyone would think that this was a good idea. I, however, understand that dumbfounded disbelief is not really an argument.

Over the course of thinking about this project I started wondering about what sort of buffer zone standards existed for situations where areas of potential effect included wetlands. There is, not surprisingly, a great amount of research out there. A report prepared Washington State Department of Ecology and partially funded by NOAA does a good job of summarizing a fair sampling of the literature ([https://www.spk.usace.army.mil/Portals/12/documents/regulatory/pdf/Wetland\\_Buffers\\_Use\\_and\\_Effectiveness.pdf](https://www.spk.usace.army.mil/Portals/12/documents/regulatory/pdf/Wetland_Buffers_Use_and_Effectiveness.pdf)). Based on recommendations in this report, I created a quick ArcGIS map (attached) showing a basic and minimal buffer zone. Although ranges of buffer widths discussed in the report varied depending on circumstances, I have selected a 100-foot-wide buffer. It is a conservative compromise resting at the bottom end of most buffer size ranges. One can easily see the vast majority of the construction area, including the main gas pump island, is well within even this most moderate of buffers. It is also worth pointing out that the sited report specifically states that a minimum buffer of 200 to 300 feet beyond the wetland is needed if the wetland is a feeding ground for or stopping over site for migratory birds (p. 44), which this wetland definitely is. In short, there is no way that this project can meet even the minimal requirements for protecting this wetland.

I assume that other commenters have presented arguments about the broader environmental and health dangers a gas station presents. I had previously assumed that there was some degree of hyperbole in the kinds of warnings one might hear at an environmental rally. I was wrong, and, as it turns out, the dangers are actually worse than I thought (<https://link.springer.com/article/10.1007/s40572-015-0074-8> and <https://www.jhsph.edu/news/news-releases/2014/small-spills-at-gas-stations-could-cause-significant-public-health-risks-over-time.html> and <https://www.sciencedirect.com/science/article/abs/pii/S0048969718337549>). So, let us assume, for moment, that gas stations are basically bad.

At this point in my thought process I asked myself if I could think of any reasons that would outweigh this basic badness or justify just completely ignoring the idea of putting a buffer between the gas station and an active wetland. What does the neighborhood get out of it in exchange for putting our health and much beloved wetland in danger?

Gas, obviously. But, also obviously, there are half a dozen gas stations in the immediate area already. We are not lacking for opportunities to purchase petrol.

There will be a mini mart, so we get access to food stuffs. But there is already a grocery store right across the street. And, since grocery store prices tend to be consistently lower than those found in convenience stores (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5580618/>), there is no economic advantage. One author (<https://smallbusiness.chron.com/difference-between-grocery-store-convenience-store-19023.html>) points out that the tradeoff for the higher prices of convenience stores is the added value of speed in purchasing. I cannot imagine there will be any increase in shopping efficiency when one must deal with the traffic at that particular intersection, however.

Taxes. I assume there will be some increase to tax revenue that may in some small way filter back to this general area. On the other hand, I imagine the entire Rock Creek/Bethany neighborhood is already generating a pretty fair amount of tax revenue. Whatever fraction of a percentage point of an increase in revenue a gas station might bring cannot possibly outweigh the potential for harm in this circumstance.

In summary, this project does not meet the most basic of environmental protection measures. I cannot even see the façade of an environmental mitigation plan. Further, on the face of the matter, I see no advantage to the neighborhood as a whole that in any way offsets the problems inherent in such a project. Finally, research has found that the potential health dangers presented by gas stations, far from being chimeras created by hysterical environmentalists, are in fact worse than we knew.




This is the wrong project, in the wrong place, and is being done in the wrong way. Please, stop this project.

Thank you for your time,

William Gardner-O'Kearny



### Legend

-  Wetland/Allenbach Acres Park
-  Wetland 100 Foot Buffer
-  Project Area

