

Friends of Toppenish Creek



FOTC Comments regarding the Sunnyside RNG Traffic Impact Analysis
August 28, 2023

These comments are based on a reading of a document entitled Sunnyside RNG Traffic Impact Analysis¹ that Friends of Toppenish Creek received on August 24, 2023, through a public records request.

When the City of Sunnyside issued a mitigated determination of non-significance (MDNS) for the Sunnyside Renewable Natural Gas (RNG) project, on June 22, 2023, that determination stated, “A traffic report is on file with the City of Sunnyside and has been reviewed by WSDOT” and “This information (including all environmental documentation and a traffic study) is available to the public upon request and can be examined at our office during regular business hours.”²

But the date of publication for the Sunnyside RNG Traffic Impact Analysis is July 10, 2023.

The City of Sunnyside posted a Notice of Environmental Review for SEPA analysis of the SS RNG project on May 17, 2023. Sunnyside posted the mitigated determination of nonsignificance (MDNS) on June 22, 2023. The Traffic Impact Analysis was not published until July 10, 2023, and was not shared with FOTC until August 24, 2023. It is almost impossible to form conclusions about a project within the time frames for comment and appeal without adequate data.

This document only looks at intersections within the City of Sunnyside. It does not address potential traffic issues in Yakima County. According to FOTC calculations, based on Figure 4 in the Traffic Impact Analysis, there would be 36 truck trips per day from the south on the Mabton Sunnyside Road. There is no discussion of the impact from this truck traffic.

Most of the manure that would be trucked to the SS RNG facility would be transported on Yakima County roads. Based on measurements from Figure 4 in the Traffic Impact Analysis there would be over 1,500 miles of truck traffic every day, and most would be on county roads.

Currently 17.6% of Yakima County property taxes apply to county roads. According to the 2023 Budget for Yakima County, the year began with a fund balance of \$5,000,000 and will end with a fund balance of \$1,302,797. Expected revenues are \$43,850,841, while expected expenditures are \$47,548,040.³

The WA State Association of Counties says.⁴

The unsustainable reality is: County transportation budgets are going backward. Counties' transportation dollars, when adjusted for inflation, are fewer than they were twenty years ago. Existing limitations on counties' ability to keep pace with growing obligations have created an annual transportation funding gap of at least \$1 billion.

Road and traffic experts tell us that wear and tear on roadways is over 2,500 greater for an eight axle truck compared to a two axle automobile.^{5,6}

Calculating the emissions from large trucks traveling 1,500 miles per day is beyond FOTC expertise. But we know that traffic emissions contribute to air pollution. In our opinion the Yakima Regional Clean Air Agency was obligated to comment after receiving the SS RNG Notice of Environmental Review – See RCW 43.21C.030(2)(d) which says, “Prior to making any detailed statement, the responsible official shall consult with and obtain the comments of any public agency which has jurisdiction by law or special expertise with respect to any environmental impact involved.”

Thank you for reading.

Friends of Toppenish Creek

3142 Signal Peak Road
White Swan, WA 98952

¹ Sunnyside RNG Traffic Impact Analysis. 2023.

http://www.friendsoftoppenishcreek.org/cabinet/data/SS%20RNG_TIA7-10-23r.pdf

² SS RNG Mitigated Determination of Non-Significance. 2023.

<http://www.friendsoftoppenishcreek.org/cabinet/data/AVS%206%20SS%20RNG%20Pacific%20Ag%202023-0200%20MDNS.pdf>

³ Yakima County Budget for 2023.

<https://www.yakimacounty.us/ArchiveCenter/ViewFile/Item/1198>

⁴ WA State Association of Counties. County Transportation Study. 2020.

<https://wsac.org/countyroads/>

⁵ Inside Science. How Much Damage Do Heavy Trucks Do To Our Roads? 2020.

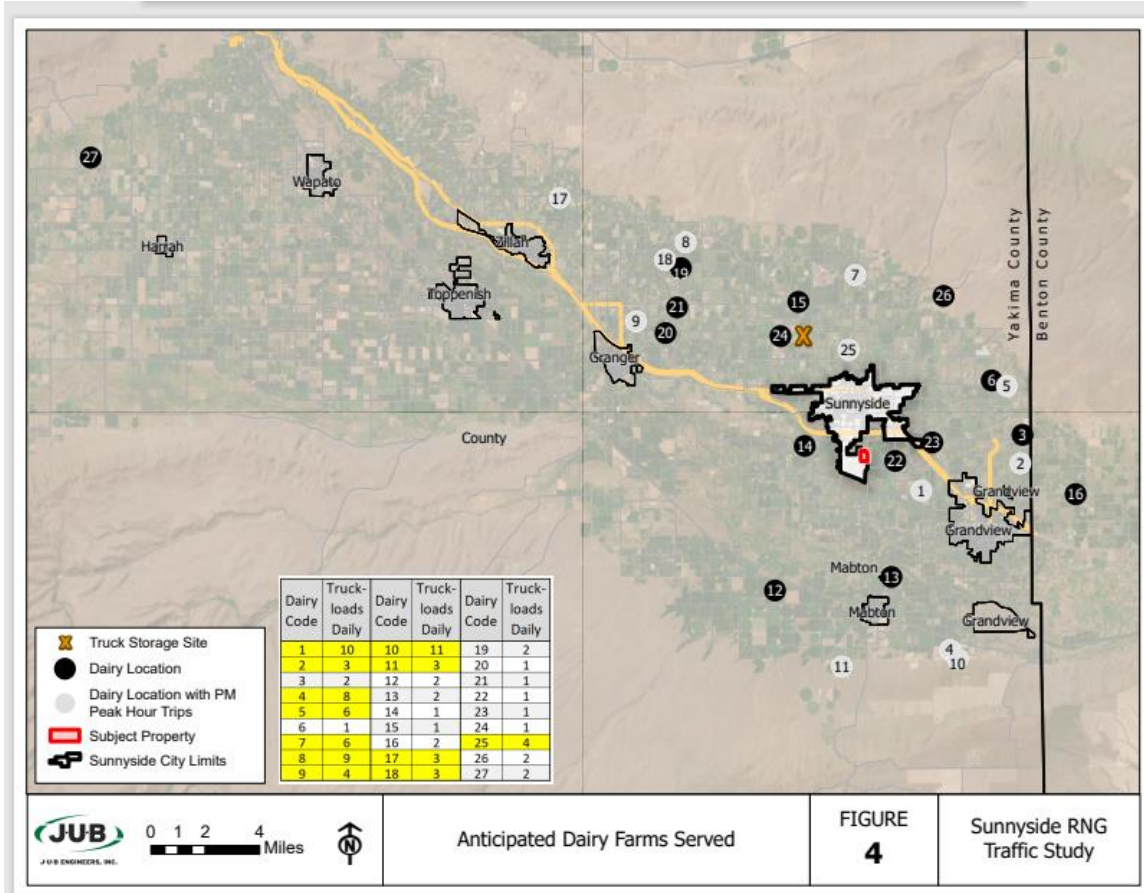
<https://www.insidescience.org/news/how-much-damage-do-heavy-trucks-do-our-roads>

⁶ U.S. General Accounting Office. Truck Weight and Its Effect on Highways. 1979.

<https://www.gao.gov/products/109954>

Attachment 1. SS RNG Traffic Impact Analysis, Figure 4.

http://www.friendsoftoppenishcreek.org/cabinet/data/SS%20RNG_TIA7-10-23r.pdf



Attachment 2. Estimate Truck Miles Traveled per Day – Based on Figure 4 from the SS RNG Traffic Impact Analysis

Work Sheet SS RNG Dairy Trips				
Dairy	# Trips	Distance	One Way Miles	Roundtrip Miles
1	10	2	20	40
2	3	6	18	36
3	2	6	12	24
4	8	10	80	160
5	6	6	36	72
6	1	6	6	12
7	6	6	36	72
8	9	11	99	198
9	4	10	40	80
10	11	10	110	220
11	3	8	24	48
12	2	8	16	32
13	2	5	10	20
14	1	2	2	4
15	1	9	9	18
16	2	8	16	32
17	3	16	48	96
18	3	12	36	72
19	2	12	24	48
20	1	10	10	20
21	1	11	11	22
22	1	1	1	2
23	1	2	2	4
24	1	6	6	12
25	4	4	16	32
26	2	8	16	32
27	2	34	68	136
Total			772	1544

YAKIMA COUNTY, WASHINGTON

**Commissioner's Final 2023 Budget
December 13, 2022**

Fund	2023 Beginning Fund Balance	2023 Revenue Budget	2023 Expenditure Budget	2023 Ending Fund Balance
<i>District Court Probation</i>	95,593	1,514,302	1,454,531	155,364
<i>Municipal Courts</i>	269,651	674,174	736,482	207,343
<i>Pretrial</i>	36,934	325,000	361,934	0
<i>Special Operations</i>	270,000	209,010	209,010	270,000
<i>Dist Crt Dispute Resol Cntr</i>	17,358	56,475	48,083	25,750
<i>Family Court</i>	107,570	181,900	289,470	0
<i>Department of Corrections</i>	1,835,945	28,297,059	28,297,059	1,835,945
<i>Noxious Weed</i>	685,188	404,884	566,747	523,325
<i>Horticulture</i>	132,237	184,000	199,918	116,319
<i>Law Library</i>	100,245	74,100	110,310	64,035
<i>Criminal Justice Sales Tax</i>	3,682,195	9,250,000	10,816,041	2,116,154
<i>Parks & Recreation</i>	64,870	100,000	154,223	10,647
<i>County Road</i>	5,000,000	43,850,841	47,548,044	1,302,797
<i>Topp/Simcoe West Railroad</i>	135,000	12,000	28,516	118,484
<i>Naches Rail Line</i>	75,000	8,000	27,814	55,186
<i>Flood Control</i>	2,307,000	9,750,484	10,052,255	2,005,229
<i>Storm Water Utility</i>	2,434,952	1,074,469	1,642,382	1,867,039
<i>Code Enforcement</i>	607,641	1,039,859	862,191	785,309
<i>Affordable & Supportive Housing Tax</i>	1,090,342	351,656	0	1,441,998
<i>Records Services</i>	205,579	227,000	330,237	102,342
<i>Motel/Hotel</i>	40,000	773,200	758,550	54,650
<i>WSU Extention</i>	38,576	5,130	13,198	30,508
<i>Emergency Medical Serv</i>	354,213	611,350	569,250	396,313
<i>911</i>	454,960	2,626,921	2,734,668	347,213
<i>ARPA Fund</i>	51,073,582	2,516,447	27,590,029	26,000,000
<i>Veterans Relief</i>	466,980	265,000	303,022	428,958
<i>Community Services</i>	2,062,286	467,200	854,634	1,674,852
<i>Mental Health Sales Tax</i>	5,785,000	5,610,000	267,073	11,127,927
<i>Treasurer's Revolving</i>	125,500	272,488	307,988	90,000
<i>Treasurer's Investment Pool</i>	263,590	194,995	258,585	200,000
<i>REET Electronic Technology</i>	235,000	40,000	125,000	150,000
<i>Supp Invest In Econ Dversif</i>	25,535,860	6,575,000	12,362,591	19,748,269
<i>Community Development</i>	0	150,000	150,000	0
<i>Affordable Housing</i>	1,155,390	1,180,000	1,325,396	1,009,994
<i>Title III PILT</i>	157,034	10,000	6,066	160,968
<i>Homeless Services</i>	21,400,822	11,450,000	11,370,822	21,480,000
<i>2008 GO Bond Redemption (214)</i>	41,885	0	41,885	0
<i>2010B Bond Redemption (218)</i>	1,774,808	267,334	121,500	1,920,642
<i>2014 LTGO Bond Redemption (201)</i>	0	436,313	436,313	0
<i>2020 GO Bond Redemption(225)</i>	0	758,250	758,250	0
<i>2020B GO Bond Redemption(226)</i>	0	555,125	555,125	0
<i>General Capital Projects (TS)</i>	50,870	500	51,370	0
<i>Fairgrounds Capital Projects</i>	192,421	1,000	193,421	0
<i>Public Works Capital Projects</i>	0	450,000	450,000	0
<i>2020 GO Bond Capital Projects</i>	2,789,898	15,000	2,804,898	0
<i>Ascend Royalties</i>	104,000	1,200	50,000	55,200
<i>RE Excise Cap Proj</i>	1,121,364	1,370,000	980,100	1,511,264



County Road

Expenditures	Actuals	Actuals	Budget	Budget
	2020	2021	2022	2023
Wages	5,014,870	5,242,032	4,777,573	5,184,203
Benefits	1,888,218	2,134,485	2,552,793	2,887,157
Supply Items	3,664,679	3,881,321	0	0
Service Items	8,156,854	8,660,367	8,546,442	10,601,923
Capital Expense	3,965,996	7,506,662	21,050,200	28,719,600
Debt	548,548	162,346	160,000	0
Operating Transfers Out	156,962	158,465	158,961	155,161
Total Expenses	23,396,127	27,745,678	37,245,969	47,548,044
Ending Fund Balance	6,956,899	3,264,596	2,823,847	1,302,797
Total Budget	30,353,026	31,010,274	40,069,816	48,850,841

Program Description:

The County Road Division of the Public Services Department is responsible for the Maintenance, Preservation and Improvement of 1,633 miles of roads, 308 federally inventoried bridges and 267 short-span bridges. The County Road Division is also responsible for the administration, accounting and right-of-way management to support these primary activities.

Major Objectives:

- Maintain and Preserve the County's road and bridge inventory in a condition that meets the transportation demands placed on it.
- Sustain a Safety Improvement Program, including enhanced traffic law enforcement, in order to ensure the safety of persons traveling on Yakima County roads.
- Plan, Design and Construct those vital transportation improvements identified in the adopted annual road program and Six Year Transportation Improvement Program.
- Aggressively pursue grants, loans and other innovative financing opportunities required to sustain the road and bridge improvements necessary to support the continued economic vitality of the region.
- Sustain a Maintenance Management system in order to ensure the long term, economical and efficient maintenance of County roads.
- Implement organizational and operational programs including: providing adequate levels of staff, developing employee training opportunities, and streamlining development review processes.
- Maintain and update countywide transportation plan.

Revenue/Expenditure Comment:

Major sources of revenue for the County Roads includes: up to \$2.25 per \$1,000 of assessed value property tax in the unincorporated areas of Yakima County. For 2022, the Maximum Lawful Road levy is estimated to be \$16,115,000. For the Preliminary Budget, a Levy Shift of \$2,200,000 is assumed, lowering the Road Levy to \$13,967,000, with a resulting Levy Rate of \$1.65 per \$1,000 of assessed valuation. Other major fund sources are: direct allocation of the County's share of the State Gas Tax, and funds from State and Federal Transportation Grants.

County Road (cont.)

County Road spending priorities are: Maintaining and preserving the existing system, providing targeted improvements calculated to improve the safety of County roads, enhancing the economic viability of the region through focused investment in transportation improvements, and provide for enhanced quality of life for Yakima County citizens.

The County Road fund also focuses on traffic Safety by funding the cost of three and one-half Sheriff's Deputies under an annual contract between the County Sheriff and Board of County Commissioners. Four Deputies are assigned to a Traffic Enforcement Squad but are available to answer higher priority criminal and life safety calls. Implementation of the contract and performance measurements are identified in a Memorandum of Understanding between the County Engineer and the County Sheriff. For budget purposes a 2022 County Road expenditure amount of \$535,387 for traffic policing is included in the Budget.