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April 30, 2026

VIA EMAIL: Bradley.Gasawski@co.kittitas.wa.us

Mr. Bradley Gasawski
Kittitas County Community Development Services
411 N Ruby ST, Suite 2
Ellensburg WA 98926

Re: SE-26-00001 Easton Travel Center
Comment on Proposed Grading Application and SEPA

Dear Mr. Gasawski:

The undersigned attorneys are counsel to Friends of Easton, a group of property owners and community members in the neighborhood of Majestic Group's proposed project. The purpose of this letter is to comment on the Majestic Group's (the "Applicant") SEPA application and analysis under the Kittitas County Code. Having reviewed the contents of the Applicant's application and SEPA checklist, Friends of Easton has significant concerns regarding the preparation of the Applicant's SEPA Checklist, as well as specific concerns regarding the sufficiency of the applicant's analysis of traffic impacts. This letter incorporates by reference the comments of its members, which have been filed separately.

First, the present application appears to be contrary to the Kittitas County Code, the Kittitas County Comprehensive Plan and the Washington State Growth Management Act (Chapter 36.70a) for failing to preserve the rural character of Kittitas County in Local Areas of More Intensive Rural Development ("LAMIRDS"). One of the fundamental principles of growth management is the principle that counties "should foster land use patterns and develop a local vision of rural character that will: permit the operation of rural-based agricultural, commercial, recreational, and tourist businesses that are consistent with existing and planned land use patterns" and "foster the private stewardship of the land and preservation of open space; and enhance the rural sense of community and quality of life." The present application proposes development which runs contrary to these principles and to the specific terms of the Kittitas County Code, the Kittitas County Comprehensive Plan, and the Washington State Growth Management Act, and its approval is therefore clearly erroneous.

Friends of Easton are concerned that efforts to install a convenience store of between 10,000¹ and 14,500² square feet presents a significant deviation from the rural character of the Easton area. Such a large structure also fails to comport with the Growth Management Act's (and through it, the Kittitas County Comprehensive Plan & Kittitas County Zoning Code's³) **required** development regulations, which prohibit new retail uses of larger than 2,500 sq. ft. in LAMIRDs which are less than 10 miles from an existing urban growth center. RCW 36.70a.070(5)(d)(i)(c)(II).

As can be seen from the below image, the proposed project site is substantially less than 10 miles away from the existing Cle Elum Urban Growth Area, whether measured as the crow flies or as a car travels. It is therefore not eligible for exceptions to development regulations which permit up to 10,000 sq. ft. of space for new retail uses. Any determination deeming this to be a compliant development proposal would therefore be clearly erroneous.



Additional deficiencies exist with regard to the applicant's analysis of the traffic impacts inherent in the project. Among other things, the traffic study used remains the 2019 study, with only a minor amendment made for 2023. This study is now seven years out of date (with the underlying data eight or more years out of date), and is not based upon the present project proposal, which is materially different from the previous Love's gas station proposal in several respects.

¹ (per the updated plan)

² (per the traffic impact analysis)

³ See KCC 17.15.030(3) (stating that all applicable state requirements shall govern a use whether specifically identified in the zoning code or not).

This is particularly apparent in the addendum, where the “future impacts” analyzed pertain to 2025, and are in any case no longer an accurate reflection of the present traffic patterns, let alone the future patterns.

The applicant should, among other things, be required to redo its traffic study to reflect evolving traffic patterns. As can be seen from the below data from the Washington State Department of Transportation’s Traffic Count Data System (TCDS), there has been substantial growth in the average daily trips from when the previous addendum was prepared in 2023, in some cases in excess of 10% for the ramps serving the Easton exit.

Location ID	CS11373	MPO ID	
Type	SPOT	HPMS ID	
On NHS	No	On HPMS	No
LRS ID		LRS Loc Pt.	
SF Group	SFS-B04 (2026)	Route Type	
AF Group	AFS-B04 (2026)	Route	090R107175
GF Group	GFS-B04 (2026)	Active	Yes
Class Dist Grp		Category	
Seas Class Grp	SCG-04 (2026)		
WIM Group			
QC Group	Short Count - Recreational		
Functl Class		Milepost	0
Located On	On SR 090 Ramp (R107175), after SR 90 WB Intersection; Begin Route		
Loc On Alias			

Location ID	CS04823	MPO ID	
Type	SPOT	HPMS ID	
On NHS	No	On HPMS	No
LRS ID		LRS Loc Pt.	
SF Group	SFS-B04 (2026)	Route Type	
AF Group	AFS-B04 (2026)	Route	090S107128
GF Group	GFS-B04 (2026)	Active	Yes
Class Dist Grp		Category	
Seas Class Grp	SCG-04 (2026)		
WIM Group			
QC Group	Short Count - Recreational		
Functl Class		Milepost	0
Located On	On SR 090 Ramp (S107128), after LX07156-E Easton Rd Intersection; Begin Route		
Loc On Alias			

VOLUME TREND ?	
Year	Annual Growth
2025	-1%
2024	13%
2023	4%
2022	-3%
2021	-7%
2017	7%
2016	0%
2015	4%
2014	2%
2013	5%

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VOLUME TREND ?	
Year	Annual Growth
2025	-1%
2024	7%
2023	3%
2022	-3%
2021	-10%
2017	7%
2016	0%
2015	4%
2014	2%
2013	5%

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Prior to this study being updated to reflect the circumstances on the ground as they are today, proper analysis and review of the traffic impacts of any proposed development is impossible, and any threshold determination based thereupon would be clearly erroneous.

Given these deficiencies, and the clear non-compliance with state law and Kittitas County Code, Friends of Easton believe that any determination the proposed project is compliant with the Kittitas County Code is clearly erroneous.

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Sincerely,

PETERSON RUSSELL KELLY LIVENGOOD
PLLC

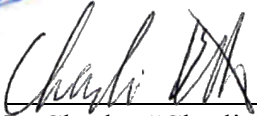
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James C. Carmody



R. Charles "Charlie" Beckett

Attorneys for Friends of Easton

cc: Marge Brandsrud, Friends of Easton
Stephanie Hartung,
Kittitas County Prosecutor's Office