

April 30,2026

To: Kittitas County Community Development Services

RE: LAMIRD NON-COMPLIANCE #SE-26-00001 Easton Travel Center

I respectfully request the County require a full SEPA review consistent with the provisions of the Growth Management Act (“GMA”), Chapter 36.70A RCW, the Washington Administrative Code provisions governing Limited Areas of More Intensive Rural Development (“LAMIRD”), and the Kittitas County Comprehensive Plan and Development Code, as specifically outlined in KCC Chapter 17.15.

Growth Management Act and LAMIRD- Under RCW 36.70A.070(5)(d) and WAC 365-196-425, the following provisions apply to the LAMIRD site identified in this proposal:

- Recognize existing areas of intensive rural development;
- Allow only infill, redevelopment, or limited expansion;
- Must remain consistent with existing character, scale, and intensity;
- Must not promote rural sprawl or urban-level development.

Kittitas County Code and Comprehensive Plan- Kittitas County adopted and implements these LAMIRD requirements through:

- Kittitas County Comprehensive Plan (Rural Element / LAMIRD policies);
- Kittitas County Code (KCC) Title 17 (Zoning);
- KCC Title 15A (SEPA).

These provisions require that development within the identified Easton LAMIRD must:

- Be consistent with existing development patterns;
- Avoid expansion of commercial intensity;
- Protect rural character and infrastructure limitations.

The Proposal Violates LAMIRD Requirements by Exceeding Existing Scale and Intensity-

The proposed truck stop/ travel center is a regional-scale, high-intensity commercial use characterized by:

- 24-hour operations;
- Continuous heavy truck traffic;

- Large fueling infrastructure;
- Extensive truck parking, servicing, idling, and overnighting.

LAMIRD regulations require that development be consistent with the existing pattern, scale, and intensity of development. WAC 365-196-425(2)(d).

The current nature of the Easton designated LAMIRD consists primarily of a few small-scale local businesses and residential uses which serve the immediate small, rural community.

The proposed project is qualitatively and quantitatively different and therefore inconsistent with applicable law.

The Proposal Is Not Permissible Infill but Constitutes Expansion and Sprawl- Under WAC 365-196-425(2), the LAMIRD designation permits only:

- Infill development;
- Redevelopment of existing sites;
- Limited expansion that does not alter overall character.

The proposed truck stop/ travel center:

- Develops previously undeveloped land;
- Introduces a new level of commercial intensity;
- Expands the functional footprint of the existing LAMIRD in Easton.

This constitutes unlawful expansion of rural commercial development because the GMA prohibits rural development that leads to sprawl. RCW 36.70A.020(2).

The Proposal Serves Regional Demand and Therefore Constitutes Rural Sprawl- The project is designed to serve interstate trucking traffic along I-90 rather than the local rural population. As such, it:

- Functions as a regional commercial hub;
- Attracts non-local demand;
- Intensifies development beyond rural-serving levels.

Per WAC 365-196-425(3), LAMIRD provisions allow only small-scale commercial uses serving the rural area. By serving regional demand, the proposal violates this requirement and constitutes prohibited rural sprawl.

The Proposal Requires Urban-Level Services- LAMIRD development must not require urban governmental services per WAC 365-196-425(4). The proposed truck stop/ travel

center in fact exceeds rural service levels and further demonstrates noncompliance with GMA and County code by likely requiring the following mitigation measures:

- High-capacity water systems;
- Significant stormwater infrastructure;
- Transportation system upgrades.

I respectfully request that the project be independently reviewed as to compliance with LAMIRD requirements as outlined in state law and county code, in addition to the completion of a full Environmental Impact Statement (EIS) pursuant to SEPA.

Respectfully submitted,

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