

Bradley Gasawski

From: Jen Phillips <phillipsj@easton.wednet.edu>
Sent: Thursday, April 30, 2026 2:20 PM
To: Bradley Gasawski; CDS User
Subject: Easton Truck Travel Plaza Public Comment
Attachments: LAMIRD NON-COMPLIANCE SE 26 00001 Easton Travel Center(2) - Google Docs.pdf; SEPA Comments SE 26 00001 Easton Travel Center(1).pdf

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Friends of Easton helped to prepare these important legal implications, to the need to cancel plans for Truck Travel Center in Easton.

Thank you,
Jen Phillips

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,

Jen Phillips,
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Parent of Students and School Board Director, of Easton School

April 30, 2026

To: Kittitas County Community Development Services

Re: SEPA Comments – Proposed #SE-26-00001 Easton Travel Center

I am writing to submit comments under the State Environmental Policy Act (SEPA) regarding the proposed truck stop/ travel center development in Easton, Washington. I request that these comments be fully considered in the County's threshold determination and that the record remains open until all relevant environmental information has been adequately disclosed and analyzed.

Based on the information currently available, there are significant concerns that the proposal may result in probable adverse environmental impacts that have not been sufficiently evaluated. For the reasons outlined below, I respectfully request that the County issue a Determination of Significance (DS) and require preparation of a full Environmental Impact Statement (EIS).

In reviewing the SEPA Checklist filed with CDS on 4-1-2026, there are numerous responses which are either not descriptive enough in the project proposal to assess the actual impact, and/or the responses submitted lack sufficient detail to address the following concerns:

1. Transportation and Public Safety Impacts: The proposal is likely to generate substantial heavy commercial vehicle traffic on local roads and at nearby Interstate 90 interchanges. This raises concerns regarding:

- Increased collision risk at rural intersections;
- Degradation of level of service (LOS);
- Impacts on emergency response times and evacuation routes:
 - Specifically, the impact to the Easton Volunteer Fire Department (Kittitas County Fire District #3) and the Kittitas County Sheriff's Office based in Ellensburg, 38 miles away (there is currently no precinct office serving Upper County);
- Pedestrian and local traffic safety;
- Increased opportunities for criminal activity to include theft, robbery, sex and human trafficking created by the nature of transitory stops, services, and overnighting at a travel center.

A detailed traffic impact analysis should be required, including peak-hour truck volumes, turning movements, and safety mitigation measures given the actual volume of vehicle and commercial traffic anticipated for this particular project (and the County should not rely on a traffic report created for a prior similar project- which was rejected at this same site).

Public safety concerns, including Fire/ EMS/ HAZMAT response capabilities as well as crime prevention/response should be analyzed in detail by working with the impacted service agencies to determine the reasonable impacts and levels of service which would be required by the proposed project, to include the number of anticipated stops for services, persons present by hour of day, plus overnights at the travel center.

2. Groundwater and Drinking Water Protection: The project's use of underground storage tanks and high-volume fuel dispensing presents a significant risk to groundwater resources. Many residents in the area rely on private wells from groundwater in underground aquifers, as does the Easton Water District (proposed as the water utility for the site).

The SEPA checklist does not appear to include adequate hydrogeologic analysis or spill risk assessment, nor does it clearly define the actual anticipated volume of fuel, diesel, and other hazardous materials which will be present and/or stored at the site.

A comprehensive groundwater study should be required, including:

- Aquifer vulnerability assessment;
- Spill containment and response measures;
- Long-term monitoring plans.

3. Surface Water, Stormwater, and Wetland Impacts: The project site is clearly within a sensitive watershed associated with the Yakima River Basin. Impervious surfaces and truck-related pollutants (oil, grease, heavy metals) may degrade water quality.

The submitted SEPA Checklist and inadequate project description fails to specify the volume of impervious surfaces (such as the large parking aprons necessary for commercial vehicles both in fueling as well as overnighting) anticipated at the site, other than it will not exceed 33%.

The EIS Checklist also does not address water-oil recovery systems which should be present for spills and to contain the regular discharge of fuel and oil as a result of frequent commercial vehicle traffic and the overnight parking of large trucks.

Additional surface water, stormwater, and wetland analysis are needed regarding:

- Stormwater runoff treatment and discharge, to include water-oil separators;
- The capture and recovery of heavy metals and other contaminants;

- Potential impacts to wetlands and critical areas, specifically runoff from the site (including the roadways leading to and from) flowing into ditches, streams, and waterways which drain to the lake and/or Yakima River Basin;
- Strict compliance with state and federal water quality standards to protect groundwater, potable water sources (local wells), and the environment.

4. Air Quality and Public Health: Truck stops are a known source of diesel emissions, including particulate matter (PM2.5) and nitrogen oxides (NOx). Idling trucks operating 24 hours a day may adversely affect nearby residents and visitors.

The County should require:

- Air quality modeling relevant to the anticipated volume of commercial vehicle traffic and overnighting;
- Evaluation of health impacts to residents;
- Mitigation measures such as anti-idling policies, filtering of emissions, and/or the implementation of other modern air quality technologies.

5. Noise, Lighting, and Rural Character: The proposed 24-hour operation will introduce continuous noise from engines, braking systems, and refrigeration units, as well as high-intensity lighting at all hours of the day and night. These impacts are inconsistent with the rural character of the Easton area as identified under the county's Limited Areas of More Intense Rural Development (LAMIRD) designation as outlined in KCC 17.15.070.

A detailed analysis should include:

- Noise level modeling (day/night);
- Ongoing light spill and glare impacts while the site is operating;
- Mitigation measures to preserve community character;
- How the proposed development meets the requirements and intent of the conditions and restrictions as outlined in the LAMIRD code for Kittitas County.

6. Wildlife and Habitat Impacts: The Easton area provides important habitat and movement corridors for wildlife. Increased traffic, lighting, and development intensity may result in habitat fragmentation and increased wildlife-vehicle collisions.

Further review should evaluate impacts on local species and habitat connectivity, including those associated with the nearby lake and river basin.

7. Cumulative Impacts/ Adequacy of the SEPA Checklist: The SEPA review must evaluate cumulative impacts, including the combined effects of this project with existing Interstate-90 traffic, regional growth, and other current community characteristics (which tend to be small businesses serving the rural area consisting primarily of homes, school, vacation cabins, and local outdoor recreational opportunities). The current documentation appears insufficient in this regard.

The environmental checklist appears to rely on generalized assumptions and lacks site-specific analysis in several critical areas. A more robust and data-driven evaluation is necessary to meet SEPA requirements as required by law.

Given the scope and potential impacts of this project, a Determination of Non-Significance (DNS) or mitigated DNS would be premature and unsupported by the current record. The potential for significant adverse environmental impacts clearly warrants preparation of a full Environmental Impact Statement (EIS).

Thank you for your consideration of these comments. Please include me in all future notices and decisions related to this proposal.

Sincerely,

Jen Phillips

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jenpknox@gmail.com / 425.864.2839

Parent of students at Easton (since 2014), and Easton School Board Director since 2015