

## Bradley Gasawski

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**From:** Jill Merwin <jamerwin@gmail.com>  
**Sent:** Thursday, April 30, 2026 2:22 PM  
**To:** Bradley Gasawski  
**Cc:** Terrence Danysh; Charlie Beckett; carmody@mftlaw.com; Gina Peckman  
**Subject:** Fwd: Easton Travel Center - SEPA 26-00001  
**Attachments:** SEPA COMMENTS 26-00001.pdf

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Hello Bradley,

Earlier today, I submitted comments regarding the proposed Easton Travel Center - SEPA 26-000001. Please reflect our Attorneys should be CC'd on the email. My apologies for not including this earlier.

We also reserve the right to comment in the future.

Jill Merwin

Sent from my iPhone

Begin forwarded message:

**From:** Jill Merwin <JAMERWIN@gmail.com>  
**Date:** April 30, 2026 at 9:02:22 AM PDT  
**To:** bradley.gasawski@co.kittitas.wa.us, cds@co.kittitas.wa.us  
**Subject:** Easton Travel Center - SEPA 26-00001

Good morning Bradley,

We have attached our comments regarding the proposed Easton Travel Center - SEPA 26-00001 - applied for by Majestic Group LLC (AJ Sandhu).

Please include us on all future notices and decisions related to this proposal.

Respectfully,

Jill and Miles Merwin

Easton Residents  
Signing on behalf of Friends of Easton  
Members of Friends of Easton  
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# SEPA COMMENTS

SE-26-00001 (Easton Travel Center) | Majestic Group LLC | Tax Parcel  
No. 778834 | Easton, Washington

## Cover Letter

**To:** Bradley Gasawski, SEPA Responsible Official

**Re:** SEPA Environmental Checklist Comments — SE-26-00001 (Easton Travel Center),  
Majestic Group LLC, Tax Parcel No. 778834 (Exit 70/I-90, Easton, WA)

**From:** Jill and Miles Merwin, Easton residents

**Date:** April 28, 2026

We submit these comments to request that the County **not** issue a DNS or mitigated DNS on the current record. As detailed in the attached comments, the applicant's checklist contains significant omissions and unsupported assumptions that **preclude meaningful SEPA review** and do not satisfy WAC 197-11-960's requirement for full, accurate, good-faith disclosure.

## Summary of Key Issues

- **Proposal description / LAMIRD limits:** The proposal description is incomplete and inconsistent with the site plan, including failure to disclose the size and use of all structures and to demonstrate compliance with Type 3 LAMIRD size limitations.
- **Air quality / diesel idling:** The checklist fails to evaluate foreseeable overnight truck-idling emissions and fails to address compliance with Washington's commercial-vehicle anti-idling limits; it also lacks enforceable mitigation.
- **Water supply and stormwater:** The checklist provides no evidence of adequate water supply or emergency capacity and fails to analyze contaminated runoff from prolonged snowmelt and winter conditions.
- **Environmental health & safety / emergency response:** The checklist downplays spill/fire risks and does not provide documentation demonstrating adequate emergency response capability for fuel storage/handling and related hazards.
- **Noise:** The checklist fails to analyze foreseeable operational noise (including overnight idling and service activities) and does not provide studies or enforceable mitigation tied to applicable thresholds.
- **Land-use compatibility:** The checklist omits adjacent rural businesses (including Silver Ridge Ranch) and fails to address incompatibility with rural character and surrounding uses.
- **Transportation / public services:** The checklist fails to adequately analyze constrained emergency access on Sparks Road, particularly during I-90 closures, and does not document adequate police/fire/medical capacity during emergency conditions.

Accordingly, we request that the County either (1) issue a **Determination of Significance** and require preparation of a full **Environmental Impact Statement**, or (2) require the applicant to submit

a revised checklist supported by the specific studies, analyses, and written documentation identified in the attached comments before any threshold determination is made.

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## Detailed Comments on Environmental Checklist

### Environmental Checklist: SE-26-00001 (Easton Travel Center)

**Applicant:** Majestic Group LLC (AJ Sandhu)

**Location:** Tax Parcel No. 778834, adjacent to Exit 70, I-90, Easton, WA

**SEPA requires full, accurate, good-faith disclosure of all probable adverse environmental impacts before the County issues a threshold determination (WAC 197-11-330; WAC 197-11-960). As submitted and amended, the checklist does not meet that disclosure standard.**

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### Section A. Description of Proposal (Page 2, Item 11)

The description of proposed structures is incomplete and inconsistent with the site plan. The site plan shows a **10,000-square-foot building** and also depicts a **shed or accessory structure**; however, the checklist fails to disclose the accessory structure's size, enclosure type, or intended use.

**WAC 197-11-960 requires applicants to describe all components of a proposal in sufficient detail to allow meaningful environmental review.** In addition, **Type 3 LAMIRD development must remain small-scale and consistent with rural character under RCW 36.70A.070 and WAC 365-196-425.**

The County should require:

- **Written documentation (narrative and site plan) identifying every building and structure (including the accessory structure), with size (sq. ft.), footprint, height, and use**
- **Written documentation (with calculations) demonstrating that total building square footage complies with the County's Type 3 LAMIRD size limitations**
- **If the calculations demonstrate exceedance of applicable LAMIRD size limits, revised plans reducing building footprints to achieve compliance**

### Section 2. Air Quality (Page 3, Items a & c)

The checklist improperly limits its air-quality discussion to vehicle ingress and egress and fails to evaluate emissions from **overnight truck idling**, a foreseeable operating condition at a truck stop/travel center.

Diesel idling emits **PM2.5, nitrogen oxides (NOx), and benzene**, which are linked to **increased cancer risk, asthma, cardiovascular disease, and lung damage**. Residences, an equine campground and wedding venue, and other sensitive receptors are located nearby.

**In 2025, Washington adopted enhanced anti-idling requirements that generally limit diesel commercial vehicles over 10,000 lbs to five consecutive minutes of idling, including auxiliary power units (SB 6304; Ecology Clean Vehicles Program). The checklist fails to address how the proposal would comply with these requirements.**

**SEPA requires disclosure and evaluation of operational emissions and mitigation measures (WAC 197-11-444; WAC 197-11-960).**

**The County should require:**

- **An air-quality modeling report, prepared by a qualified professional, that evaluates emissions from overnight truck idling under peak-use and winter inversion conditions and discloses all assumptions and inputs**
- **A health-impact evaluation that addresses PM2.5, NOx, and benzene exposure under peak-use and winter inversion conditions, including identification of nearby sensitive receptors**
- **Written documentation establishing enforceable mitigation measures, including posted no-idling zones, an operational compliance plan, and compliance with Washington's five-minute idling limit**

## Section 3. Water Resources (Page 4–5)

### Groundwater / Water Supply

The checklist claims that the project will connect to the Easton Water District, but it provides no evidence of available supply, pressure, or emergency capacity.

**SEPA requires disclosure and evaluation of water availability and service adequacy, including for emergency conditions (WAC 197-11-960).**

**The County should require:**

- **Written documentation from the Easton Water District (service letter) demonstrating sufficient supply, capacity, and pressure for full commercial build-out, fire flow, and emergency response**

### Stormwater and Snowmelt Runoff

The checklist fails to analyze contaminated runoff from **snow and ice melt typical of Easton's climate**, including petroleum products and heavy metals. Under SEPA and applicable County stormwater standards, stormwater impacts must analyze and account for **seasonal hydrology and contaminant transport**.

The County should require:

- **A site-specific stormwater engineering report, prepared by a qualified engineer, that evaluates prolonged snowmelt conditions, pollutant loading (including petroleum contaminants and heavy metals), treatment BMP performance in winter conditions, and downstream receiving-water impacts**

## Section 7. Environmental Health & Safety (Pages 6–7)

The checklist claims that “**no special emergency services are anticipated,**” despite fuel storage and handling, other hazardous materials, and the site’s proximity to forestland.

**WAC 197-11-960 requires disclosure of risks from spills, fire, hazardous materials, and emergency response capacity.** The Easton Fire Department is volunteer-based with limited daytime staffing, which limits response capability.

The County should require:

- **A spill prevention and hazardous materials management plan (SPCC-level), appropriate to the proposed fuel storage and handling**
- **A written inventory identifying all hazardous and toxic substances stored, handled, or generated onsite, including maximum quantities and storage locations**
- **A fire risk and emergency response assessment, prepared in coordination with the Easton Fire Department, including wildfire risk considerations and applicable DNR wildfire requirements**
- **Written documentation demonstrating adequate police, fire, and medical response resources to serve the proposal**

## Section 7b. Noise (Page 7)

The checklist fails to analyze **overnight idling noise, noise from increased traffic to and from the site, or noise from tire and repair activities,** which are common operational noise sources at truck stops/travel centers.

**SEPA requires disclosure and evaluation of operational noise impacts where prolonged exposure is foreseeable.**

The County should require:

- **A post-construction noise study that measures overnight operations (including idling), traffic, and service/repair activities at nearby residences and other sensitive receptors**
- **If the study identifies exceedances of applicable noise thresholds, written documentation establishing enforceable mitigation (e.g., sound walls, vegetative buffers, operational restrictions, and posted no-idling zones) sufficient to achieve compliance**

## Section 8. Land Use Compatibility (Page 7)

The checklist omits **Silver Ridge Ranch**—an equine campground, wedding venue, and long-established rural business adjacent to the site—and fails to address land-use incompatibility.

**Type 3 LAMIRDs must preserve rural character, avoid urban-scale impacts, and remain visually and functionally compatible with surrounding rural uses (RCW 36.70A; WAC 365-196-425).**

The County should require:

- **A land-use compatibility analysis that evaluates impacts to adjacent and nearby rural businesses and residences (including noise, lighting, hours of operation, traffic, and buffering) and identifies specific mitigation measures**
- **Written documentation establishing redesign and/or enforceable mitigation sufficient to preserve rural character and maintain visual and functional compatibility with surrounding rural uses**

## Transportation & Public Services (Pages 10–11)

Emergency access along Sparks Road—including during I-90 closures—is constrained, and the checklist fails to adequately analyze these conditions.

**SEPA requires evaluation of transportation impacts and emergency service capacity, including emergency response (WAC 197-11-960).**

The County should require:

- **An emergency access and ingress/egress analysis, prepared by a qualified professional, that evaluates alternative ingress/egress routes and conditions during I-90 closures**
- **A traffic impact study, prepared by a qualified professional, that evaluates peak operations during snow events and freeway closures and identifies mitigation needed to maintain safe operations**
- **Written documentation demonstrating adequate police, fire, and medical service capacity to serve the proposal during normal operations and emergency conditions**

## Conclusion

**For the reasons stated above and given the project’s potential for significant adverse environmental impacts, the County lacks an adequate record—and the checklist does not provide a basis—to issue a Determination of Non-Significance or mitigated DNS. The County should issue a Determination of Significance and require preparation of a full Environmental Impact Statement under RCW 43.21C and WAC 197-11.**

## Appendix A — Applicable Washington Requirements

### Primary Authorities

1. RCW 43.21C — State Environmental Policy Act
2. WAC 197-11-330 — Threshold determinations
3. WAC 197-11-444 — Mitigation
4. WAC 197-11-960 — Environmental checklist requirements
5. RCW 36.70A.070 — Rural element & LAMIRDs
6. WAC 365-196-425 — Rural character
7. Washington SB 6304 (2025) — Commercial vehicle idling limits
8. Ecology Clean Vehicles Program — Diesel emissions / NOx / PM2.

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

Respectfully submitted, on behalf of Friends of Easton,

*Jill Merwin*      *Miles P. Merwin*

Jill and Miles Merwin

Easton, Washington Residents

Members of Friends of Easton

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