

Bradley Gasawski

From: Shawn Hebert <hebertshawn35@gmail.com>
Sent: Thursday, April 30, 2026 12:53 PM
To: Bradley Gasawski
Cc: CDS User; Laura Osiadacz
Subject: URGENT: Public Comment - SE-26-00001 (Easton Travel Center) - Shawn T Hebert

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

URGENT: Public Comment - SE-26-00001 (Easton Travel Center) - Shawn T Hebert

To: Kittitas County Community Development Services
Attn: Bradley Gasawski, Planner
411 N. Ruby St., Suite 2
Ellensburg, WA 98926

Re: Formal Opposition and Demand for Determination of Significance – SE-26-00001 (Easton Travel Center)

To Whom It May Concern,

Please accept this formal rebuttal to the Easton Travel Center (SE-26-00001). As a party of record, I am submitting this to highlight the project's direct conflicts with the Washington State Growth Management Act (GMA) and Kittitas County Code (KCC). This application exhibits "probable significant adverse environmental impacts" that cannot be mitigated through standard SEPA checklists, necessitating a full Environmental Impact Statement (EIS) under WAC 197-11-360.

1. Illegal Urbanization of Rural Lands (RCW 36.70A.110 & RCW 36.70A.030)

The proposal for 5.3 acres of impervious surface constitutes an "urban growth" footprint outside of a designated Urban Growth Area (UGA). Under RCW 36.70A.110, urban-scale development is prohibited in rural zones. A Type 3 LAMIRD is strictly limited to "small-scale" businesses. At 10,000 SF and 5+ acres of asphalt, this project is an industrial transit hub, not a rural-scale service. It violates the requirement that rural development must be "consistent with the protection of the character of the rural area" (RCW 36.70A.070(5)).

2. Violation of LAMIRD Specific Use Standards (KCC 17.11.050.5)

Kittitas County Code strictly limits the intensity of Type 3 LAMIRDs. KCC 17.11.050.5 mandates that retail sales and services be limited to 4,000 square feet. This 10,000 SF application, paired with high-intensity commercial fueling, is a flagrant attempt to bypass zoning density protections.

3. Failure to Protect Critical Aquifer Recharge Areas (KCC 17A.05 & RCW 36.70A.172)

The applicant's intent to "discharge into the ground" violates the Best Available Science (BAS) mandate of RCW 36.70A.172.

The site sits on porous Kladnick soils, making it a high-risk Critical Aquifer Recharge Area (CARA).

WAC 197-11-444 requires an analysis of impacts on groundwater. Discharging untreated stormwater containing petroleum, heavy metals, and de-icing chemicals from a 5.3-acre truck stop into a primary drinking water source is a catastrophic risk that the current SEPA checklist fails to address.

The proposal seeks to create approximately 5.3 acres of impervious surface (representing roughly 1/3 of the 16.51-acre site).

Heat Sink Effect: This vast expanse of asphalt and concrete creates a localized heat sink, significantly altering the thermal environment of this forested rural area. Such a major industrial footprint is a direct violation of RCW 36.70A.030, which mandates that the built environment be subordinate to the natural landscape.

Scale Incompatibility: A Type 3 LAMIRD is intended for small-scale development. Converting 1/3 of this large parcel into a high-intensity transit hub permanently destroys the visual and aesthetic "rural character" the County is legally obligated to protect.

4. Omission of Sensitive Species & Habitat Impacts (KCC 17A.04 & WAC 197-11-444)

I have witnessed among other wildlife the presence of the Northern Rubber Boa (*Charina bottae*), a species of local importance and ecological sensitivity, necessitates a Biological Site Assessment. The 5.3 acres of pavement will result in total habitat destruction and soil compaction, violating the County's duty to protect "Fish and Wildlife Conservation Areas" under KCC 17A.04.

Light Pollution and Dark Sky Degradation (KCC 17.11.050 & WAC 197-11-444)

The operation of a 24-hour travel center introduces severe light pollution into a currently dark-sky environment.

Environmental Impact: Excessive glare and "sky glow" disrupt the circadian rhythms of both local residents and sensitive wildlife, such as the Northern Rubber Boa.

Legal Conflict: WAC 197-11-444 requires an evaluation of impacts to the "built environment," which includes aesthetics and light. This industrial glare is a nuisance that devalues Easton as a recreational and residential gateway.

5. Non-Conformity with Snow and Stormwater Management (KCC 12.06)

Under KCC 12.06, stormwater management must not impact adjacent properties. In a mountain environment with 100+ inches of annual snowfall, the displacement of snow and subsequent meltwater from 5.3 acres of asphalt is a physical impossibility within the proposed parcel boundaries. This will lead to illegal off-site flooding and pollutant transport.

Vulnerability of the Yakima River Watershed and Local Aquifer in merely 4 hours of 1 per hour scenario:

The application fails to account for the catastrophic shift in hydraulic behavior that 5.3 acres of asphalt will cause. A direct comparison between the existing natural forest and the proposed "Travel Center" reveals a massive, unmitigable increase in runoff volume and pollutant transport:

Natural Undisturbed Forest (Current State): In its current state, the 5.3-acre area of native vegetation and Kladnick ashy sandy loam acts as a natural sponge. During a high-intensity storm (1"/hour), the forest floor's "duff" layer and root systems provide nearly 90% infiltration. The resulting runoff is negligible, filtered of impurities, and slowly recharges the aquifer.

Proposed 5.3-Acre Paved "Heat Sink": Once paved, this same area becomes 100% impervious. In a 4-hour "mountain storm" event (1" rain/hour), this site will generate approximately 575,690 gallons of liquid runoff.

The "Flushing" Effect: Unlike the forest, this asphalt will not filter water. Instead, it will "flush" a concentrated slurry of petroleum hydrocarbons, heavy metals, and toxic tire-wear chemicals (including 6PPD-quinone) directly into the ground-discharge system.

Snow Displacement Realities: A 4-hour heavy snow event (1' snow/hour) will create over 920,000 cubic feet of snow. In a natural forest, this snow melts slowly and stays on-site. On a 5.3-acre paved lot, this volume requires mechanical relocation. There is physically insufficient "open space" on the 16.51-acre parcel to store this volume of contaminated snow without violating KCC 12.06, which prohibits impacting adjacent properties with managed runoff.

Legal Conclusion: The shift from 90% infiltration to 0% infiltration over 5.3 acres constitutes a "probable significant adverse environmental impact" under WAC 197-11-444. The County cannot legally issue a Determination of Non-Significance (DNS) for a project that replaces a natural watershed sponge with a half-million-gallon industrial runoff engine.

Having witnessed double or even quadruple those amounts for eight hour periods, the concern grows exponentially.

Due to the massive scale, groundwater risks, and direct violations of GMA "Rural Character" mandates, Kittitas County must issue a Determination of Significance (DS). The public cannot trust a "Mitigated Determination of Non-Significance" when the proposed "mitigation" (ground discharge) is itself the primary threat to the aquifer.

Thank you for your assistance and services.

Sincerely,
Shawn T. Hebert
PO BOX 490
241 Rally way
Easton Wash. 98925
509.656.6090