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The following comments apply to the **VA 23 00003** Zoning Variance Application Submitted by:
Land Owner Sparks Park LLC C/O Lisa Weis
Agent AJ Sandhu
Tax Parcel number: 778834

The requested variance appears to actually be a request for Land Use Change and RE-Zone, as a "Truck Stop" this allowed use, is only available in the Urban Land Use designations.

The applicant has not requested a variance to build a "Service Station" which would include the sale of gasoline and diesel. The requested variance will not allow such activities which are not an allowed use in the General Commercial designation of the Type III LAMRID.

The Zoning Variance Application Narrative document does not identify the applicant or the specific Parcel requesting the Variance.

Submitted Zoning Variance Application VA 23 00003

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Required Attachments

The attached Preliminary Site Plan does not clearly identify Septic tank, drain field and replacement area. The document is almost impossible to read due to the poor quality. It is difficult to tell if the additional items required by the Site Plan submittal are included in the submitted document. Without clarity it is difficult if not impossible to make constructive comments on the site plan for this document.

Page 3 Question 10

Response to applicant section "A"

The Comprehensive Plan states clearly the path to GMA Compliance. "RR G32 Rural Employment Center – Intensification of development on lots containing isolated nonresidential uses or new development of isolated small-scale businesses that are not principally designed to serve the rural area, but do provide job opportunities for rural residents." The Allowed uses in Kittitas County Code Title 17.5 implement the goals set out in the Comprehensive Plan. Clearly the approval of this Variance request would **not** result in an isolated small-scale business.

The current owner of this parcel had an opportunity during the Growth Management Hearings Board Compliance process to offer input as to the designation of this parcel as a part of a Type 3 LAMRID. My recollection is that they gave positive input regarding the parcel's inclusion in this LAMRID. One would have to check the official record to confirm that statement. That entire process which was designed to bring the County into compliance with the Growth Management act regarding the protection of "Rural Character" was done at with great effort and considerable cost to Kittitas County. The request for a "Variance" that would more than double the allowed impervious soil coverage and retail area is **excessive** and certainly does not maintain the "Rural Character" as intended by the allowed uses put in place to preserve that aspect of the Compliance process. You can't hide a 16.5-acre development with a few trees which will likely obstruct the visibility for traffic entering and leaving the development. Then there is the view from aircraft using the nearby airport. This proposal would look like a very out of place urban type development.

The unusual circumstances or conditions cited in the applicant's narrative there is discussion regarding the difficulty of access. They express access concerns that are unique to the immediate location. Ingress and Egress for vehicles visiting a "Truck Stop" is extremely important to public safety and the flow of traffic on the frontage road as well as the very nearby I-90 on and off ramps. This circumstance will easily cause substantial blocking events during snow events. The location of the proposed truck stop will also serve to attract many additional vehicles during snow and other events that cause an interruption to travel on I-90. The public will become quickly aware of the facility. The infrastructure in Easton cannot accommodate the additional vehicular traffic generated during such

events. This truck stop would quickly become an attractive nuisance. It should be clear that humans cannot rid themselves of the notion is always best to be first in line.

No emergency evacuation route available in the event of a large fire near Easton or chemical spill at the facility. All local residents would be required to move toward the facility to evacuate their homes. In the event of Fire, including wildfire, Chemical spill, Explosion, flooding or other event requiring emergency evacuations from East and West Sparks Road, would be dangerously impaired due to addition of large numbers of freight trucks and autos at the proposed development. There are no alternate routes from this area and all resident ingress and egress routes are at the I 90 at the Exit 70 interchange ramps. As has been testified in the past – Easton Fire Department is on the South side of I 90, there are Fire fighters on the North and South side of I 90, the point being how do you get the personal to the equipment and how do they efficiently access and call on the North side of I 90. This can be a very dangerous for local residents. The need to upgrade or add facilities would be looked at as extending urban facilities to rural areas to accommodate new growth.

Again, I must remind the reviewer of this request that, the property owner had ample opportunity during the Comprehensive Plan Compliance process to comment on the proposed Type 3 LAMRID. The size of the parcel has not changed during the intervening time. It was substantially larger than other parcels then as it is now. There are allow uses as stated in Title 17.15.070 that are more suitable to a 16.5-acre parcel. The property owner can still enjoy several other uses which are actually more compatible with neighboring properties while maintaining the rural character of the area.

The applicant also indicates that along with the difficult access there is highly restricted visibility due to the lower site topography. The topography should be of concern regarding run off especially volumes from snow melt. Also of concern is the fact that the designated truck parking is al the lower portion of the parcel which will likely cause a considerable challenge to trucks using that area during snow events causing a possible traffic flow problem at ingress and egress points.

The proposed vegetation to shield the view of the truck stop would have consist of some very tall trees if traffic on the frontage road and I-90 are not able to see the activity or lighting from the proposed truck stop. The proposed vegetation must also be placed and spaced to accommodate Firewise landscape. In a rural forested area such as Easton Wildfire is a very real concern. Having a

large quantity of flammable material is of special concern. Weather ignition were to take place on or off site there would be irreparable harm. Again, a reminder that there is only one way in and out of Easton and this project is in a location when operational could cause substantial problems with evacuations as well as possibly impeding access to the Airport for firefighting equipment and personal.

References to the Land use and Comprehensive Plan seem to demonstrate a lack of respect and understanding of the purpose of such documents or perhaps they are simply taking things out of context which can lead to unintended consequences.

Response to applicant section "B"

The applicant's request for variance says "is necessary for the preservation and enjoyment of a substantial property right of the possessed by the owners of other properties in the same vicinity."

Other property owners in the same Type 3 LAMRID enjoy and are governed by the same property rights and zoning regulations as the applicant. The approval of this variance however will gravely impact at least one neighboring property owners. Specifically Silver Ridge Ranch is within feet of the proposed truck stop. The Campground at Silver Ridge Ranch is directly behind the proposed truck stop. Trucks traffic, service and repair operations, noise levels and emissions would be greatly detrimental to the Silver Ridge Ranch property operations. Silver Ridge Ranch has operated on that parcel for decades. Silver Ridge Ranch provides recreation in a rural setting. Building a truck stop for their customers to look at smell and hear would be unduly burdensome to those property owners.

I do not believe the applicant has presented documentation that would justify the requested variance. The request is **excessive**. Requesting more than 100% increase in impervious surface area and Retail space is not in keeping with the preservation of rural character mandated by the County's Comprehensive Plan.

A variance to develop a "truck stop" in a rural area is not beneficial. This is a parcel which has the ability to be developed in a manner more beneficial to the area and allowed by Zoning regulations. Allowed Uses include, Animal boarding, Agriculture sales, Farm stand, Grazing, Nurseries, Cemetery, Auction sales of non-agriculture products, Restaurant, Retail sales, general, Retail sales,* lumber and

building materials, Services, Vehicle/equipment service and repair, Manufacturing, Parks and playgrounds, Recreation, indoor, Mini-warehouse, Adult family home, among many others. All uses permitted out right or by conditional use are required to abide by, "**17.15.070 Allowed Uses in Rural LAMIRD Lands**. Note to Reader: All allowed uses within Type 3 LAMIRDs, other than manufacturing, outdoor recreation, and natural resource processing will be limited to 30,000 square feet in area, and that impervious surfaces on lots greater than one acre in size are limited to one third (1/3) of the lot." There are also many other restrictions on uses noted in the foot notes for each use. These restrictions were put in place to implement protections for Rural Character as required for compliance with Washington State's Growth Management Act. Kittitas County's Comprehensive Plan and associated Zoning regulation have been declared in compliance by the Growth Management Hearings Board and allowing the excessive request in this variance will put the County at risk for non-Compliance again.

Even in the Urban use Table there are restrictions regarding the Vehicle/equipment service and repair allowed uses

17.15.80.1 Urban Use Table

Limited Commercial Vehicle/ equipment service and repair*, P 18 Limited to service stations, provided there shall be no repairing, repainting, reconstruction or sale of motor vehicles from the premises.

General Commercial Vehicle/ equipment service and repair*, P 11 Permitted when conducted wholly within an enclosed building (excluding off-street parking and loading areas).

The allowed use for a Truck Stop only appears in Urban Zones and is restricted to the following Zones

Highway Commercial Vehicle/ equipment service and repair*, P 19 Includes truck stop operations. Minor repair work permitted.

Light Industrial Vehicle/ equipment service and repair*, P 19 Includes truck stop operations. Minor repair work permitted.

The limitations on siting Truck Stop facilities in the Allowed Use Tables Makes it abundantly clear the County has taken steps to site such facilities appropriately. This Variance application is not appropriate and should be denied on the basis that the County has provided adequate Zoning to allow this type of facility on much more appropriate parcels.

There are other parcels in Kittitas County which are much more suited for and zoned for this type of project. The parking needs related to I-90 traffic are admittedly a big issue for Easton. WSDOT this winter has closed I-90 access at Ellensburg and Cle Elum as well as Exit 70 Which has to some extent mitigated the issue. WSDOT is continuing to improve I-90 allowing for more efficient and effective snow management. I believe the work on going and in the pipeline will alleviate much or the parking problem on Easton streets as that work progresses.

The impervious service coverage, although has a relationship to Rural Character but, is in place to preserve water quality, reduce undesirable runoff and maintain habitat. There is no infrastructure for treatment of run off in place in Easton. Run off from any surface which is used continuously by heavy vehicular traffic, and is subject to petroleum product spills, small or large, emissions and substantial snow fall with melt water runoff is not healthy for the environment.

Response to applicant section "C"

The Comprehensive Plan and Zoning Codes provide areas in the County that will best serve public well-being. Those regulations also dictate where Truck Stop facilities are best suited. I think the "well-being" of the traveling public is best decided on a larger scale. The applicant appears to believe that "well-being" should be to providing fuel sales, general retail sales, a vehicle/truck stop service and repair shop and a restaurant on a large scale. Those are not amenities associated with rural character and are rightfully not allowed to occur in this Type 3 LAMRID.

The view stated under the heading, "Property in the Vicinity", that higher volumes of traffic will serve to protect Rural Character completely escapes my understanding.

As I have already commented it will likely be impossible to retain rural character if this variance request is approved. You can't hide a facility of this size. The environmental hazards, noise, air quality, runoff and reduction in impervious soils are not appropriate for

Response to applicant section "D"

Granting this Variance Request will absolutely effect the realization to the comprehensive development plan. Developing General Commercial on the scale proposed will **not** promote preserve or enhance the rural character of the LAMRID. Services proposed will provide services that are in extreme excess of what is consistent with the Comprehensive Plan. The proposed project is designed in a way that will not promote further development of adjacent "General Commercial "properties within the LAMRID. The proposal has stated that **it would funnel traffic into its establishment discouraging travel other businesses in the LAMRID.** The effects on local infrastructure would result in the extension of urban services to accommodate rural sprawl which is strictly prohibited. The proposal would require extension and annexation into the public water district. That water district would require substantial improvement to meet the needs of the proposed truck stop. The local fire department would be required to obtain equipment and training to meet responses to spills, petroleum or chemical spills ro ignition, as well as additional EMS personal to meet the needs of those visiting the truck stop. Easton is a very small community with only a small volunteer staff. This community does not have a tax base to add full time staff and additional equipment to meet the requirements to keep the community safe.

Employment

The dream that the facility would create jobs for locals, is just that a dream. Most citizens of Easton are much more gainfully employed than the wages offered at a truck stop, restaurant or Convivence store. The rest of the residents either are unable to work or do not need to work. There are few rental properties or homes for sale in Easton that would be in budget for those 20 employees. The proponent could argue that if their plan goes forward, home values in Easton would decrease substantially and maybe there might be some housing available for their employees. But that would be detrimental to home owners in Easton. One more reason to deny the variance. Potential employees would have to travel several miles to get to Easton for work. Given the cost to travel these days it will be difficult to retain employees here.

The following comments are intended to demonstrate further why the proposed variance should be denied.

Prohibited use" means those uses **not** specifically enumerated as allowed uses under the provisions of KCC Chapter 17.15. (Ord. 2018-001, 2018; Ord. 2013-012, 2013; Ord. 2013-001, 2013; Res. 83-10, 1983)

Definitions 17.08.469A Retail sales

"Retail sales" means selling goods or services to the general public for personal or household consumption and rendering services incidental to the sale of such goods. This definition excludes agriculture sales.

While this is a general definition there are specific restrictions placed on the actual allowed aspects of this use. Retail sales by definition include sale of diesel and gasoline, providing over night parking space for travelers (semi-trucks and RVs), providing maintenance for their customers, selling and installing tires and other parts and supplies used in the performance of service tasks.

17.15.060 Allowed uses in rural non-LAMIRD lands

Retail sales,* general **Forest & Range Foot Note 51** When enhanced agricultural sales are provided. **CU Foot Note 36** Allowed only as a conditional use in the Liberty Historic Overlay Zone, subject to the provisions of KCC Chapter 17.59.

Retail sales,* general, **General Commercial CU Foot Note 18** Retail sales are limited to groceries and sales directly related to tourism and recreation. Structural footprint containing all of these activities may not exceed 4,000 square feet.

Retail sales,* general **Rural Recreation CU Foot Note 18** Retail sales are limited to groceries and sales directly related to tourism and recreation. Structural footprint containing all of these activities may not exceed 4,000 square feet.

Note that Retail sales in all rural lands are restricted to the same 4,000 square foot size as the Type III LAMRID. This should make it very clear the County is serious about controlling inappropriate development in Rural Lands

17.15.70.1 Rural LAMIRD Use Table

Type 1 LAMRID Commercial Permitted

Retail sales,* general, **General Commercial Foot Note 48** Permitted when conducted wholly within an enclosed building (excluding off-street parking and loading areas), provided the use does not exceed four thousand (4,000) square feet.*

Retail sales,* general **Highway Commercial Permitted Foot Note 14** Retail sales limited to groceries and sales of souvenirs, gifts, novelties, curios and handicraft products. Grocery stores may not exceed four thousand (4,000) square feet.

Retail sales,* general PUD Permitted

Type 3 LAMRID Use Table

Retail sales,* general Limited Commercial Permitted **Foot Note 48** Permitted when conducted wholly within an enclosed building (excluding off-street parking and loading areas), provided the use does not exceed four thousand (4,000) square feet.*

Retail sales,* general General Commercial Permitted **Foot Note 48** Permitted when conducted wholly within an enclosed building (excluding off-street parking and loading areas), provided the use does not exceed four thousand (4,000) square feet.*

Retail sales,* general Highway Commercial Permitted **Foot Note 14** Retail sales limited to groceries and sales of souvenirs, gifts, novelties, curios and handicraft products. Grocery stores may not exceed four thousand (4,000) square feet.

17.15.80.1 Urban Use Table

Retail sales,* general **Limited Commercial Permitted Foot Note 11** Permitted when conducted wholly within an enclosed building (excluding off-street parking and loading areas).

Retail sales,* general **General Commercial Permitted Foot Note 11** Permitted when conducted wholly within an enclosed building (excluding off-street parking and loading areas).

Retail sales,* general **Highway Commercial Permitted Foot Note 11** Permitted when conducted wholly within an enclosed building (excluding off-street parking and loading areas).

Urban uses also require the business be wholly enclosed within an enclosed building. This further demonstrates the Counties effort to remain compliant with the Growth Management Act.

Definitions 17.08.560A Vehicle/equipment service and repair.

"Vehicle/equipment service and repair" means maintenance of motorized vehicles and equipment including exchange of parts, installation of lubricants, tires, batteries, and similar vehicle accessories, minor customizing and detail operations, and body shops. This definition includes gas and service stations. (Ord. 2013-001, 2013)

While this is a general definition there are specific restrictions placed on the actual allowed use of certain aspects of this use.

17.15.070 Allowed Uses in Rural LAMIRD Lands

Rural Employment Centers Foot notes 50,52

(Type 3 LAMIRDs)

General Commercial, Vehicle/equipment service and repair*, Foot Note P 11 Permitted when conducted wholly within an enclosed building (excluding off-street parking and loading areas).

This does seem to eliminate the allowed use for fuel station which cannot be wholly enclosed in a building.

The only Truck Stop and repair facility in the allowed the use table for Rural LAMRIDS is as follows

17.15.070.1 Rural LAMIRD Foot note 49

(Type 1 LAMIRDs)

Highway Commercial , Vehicle/equipment service and repair*, Foot Note P 19 Includes truck stop operations. Minor repair work permitted.

This demonstrates the County has determined such facilities should be only be sited as described, to assure the protection of Rural Charcter and maintain compliance with County Wide Planning Polocies, the Comprehensive Plan and the State’s Growth Management Act.

Even in the Urban use Table Truck Stops are restricted and there are restrictions regarding the Vehicle/equipment service and repair allowed uses

17.15.80.02 Urban Use Table

Limited Commercial Vehicle/ equipment service and repair*, P 18 Limited to service stations, provided there shall be no repairing, repainting, reconstruction or sale of motor vehicles from the premises.

General Commercial Vehicle/ equipment service and repair*, P 11 Permitted when conducted wholly within an enclosed building (excluding off-street parking and loading areas).

The allowed use for a Truck Stop in Urban Zones is restricted to the following Zones

Highway Commercial Vehicle/ equipment service and repair*, P 19 Includes truck stop operations. Minor repair work permitted.

Light Industrial Vehicle/ equipment service and repair*, P 19 Includes truck stop operations. Minor repair work permitted.

The limitations on siting Truck Stop facilities in the Allowed Use Tables Makes it abundantly clear the County has taken steps to site such facilities appropriately. This Variance application is not appropriate and should be denied on the basis that the County has provided adequate Zoning to allow this type of facility on much more appropriate parcels.

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Easton Travel Center SEPA SE 23 00010

Applicant: Mountview View Group LLC

Tax Parcel: 778834

Check list Submitted 4/17/23

The submitted information in this document is incomplete which misrepresents the actual conditions and impacts of the applicant's proposal. The applicant has only provided a small portion of the environmental information. There is information that a property owner or developer should be well aware of before answering questions put forth in a SEPA. This applicant has not provided enough information to base an informed decision on the next step for the application to move forward.

A. Background

10. List any government approvals or permits that will be needed for your proposal, if known.

Additional government approvals and or permits should include the following Propane Tank placement, Grade and Fill Permit, Large on Site Septic System, Oil Water Separators as required at fuel canopies and service building (possibly also for catch basins where runoff from truck parking

spaces would catch oil, fuel, antifreeze and other contaminants), a Boiler permit to operate a large capacity air compressor, an approved storm water plan which includes plans for snow storage and melt runoff. Wildland interface codes would require additional landscape approvals. Those requirements could require thinning established trees and removal of low growing tree boughs and branches which would interfere with the applicants plan to use existing trees to shield the view of such a large project. Provisions for potable water will require government approval and infrastructure permits. There could be additional permits or approvals required.

B. Environmental Elements

1. Earth

g. about what percent of the site will be covered with impervious surfaces after project construction is complete.

The 74% impervious surface does not match the 69% impervious surface stated on the Zoning Variance Application Narrative page1. IMPERVIOUS AREA. Whether the percent is 69 or 74 it is excessive and does not reflect the goals set out for a Type 3 LAMRID.

Air

a. What types of emissions to the air would result from the proposal during construction, operation and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

On site **Emissions after** construction should include, emissions emitted from the exhaust of vehicles idling in parking spaces. Fuel vapors produced when underground storage tanks are filled. Fuel vapors created when fueling vehicles. Fuel vapors and lingering odors from fuel spills.

b. Are there any off-site sources of emissions or odor that may affect your proposal. If so generally describe.

Off -site emissions should include wood smoke generated by camp fires in the long-established camp ground and lodge directly abutting property. Smoke from regular spring debris burns in the area. And smoke from the summer wildfires that often migrate to the Easton area and can be at ground level due to the regularly occurring inversions in the area.

c. Proposed measures to reduce or control emissions or other impacts to the air, if any:

The applicant did not answer this question completely. It appears they offer no effort to control or reduce the impacts of their business once it becomes operational.

3. Water

b. Ground Water

1) Will ground water be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities with from the well. Will water be discharged to ground water? Give general description, purpose and approximate quantities if known.

Potable water could be provided by the Easton Water District which the applicant will have to request. The water district will have to process the request in order to determine if it is able to meet the quantity requested and the applicant will likely have to provide any required infrastructure.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources if any (for example: Domestic sewage; Industrial, containing the following chemicals ...; agricultural; etc.) Describe the general size of the system, the number of such systems, the

number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Water via Large on-site Septic System and Storm water runoff will be discharged to ground. The applicant did not provide required information regarding the size of the system or the number of humans expected to be served. The disposal of discharge from oil water separators is also not addressed or quantified.

c. Water runoff (including storm water)

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so describe.

The applicant has not answered this question completely. The source is not identified nor has the method of collection. Water runoff must also address the large amounts of snow that will be stored on site and melt into runoff at times quickly. Depending on the storage area and method, snow storage can inhibit runoff from storm water and cause local flooding which must also be addressed.

2) Could waste materials enter ground or surface waters? If so generally describe.

I don't believe the applicant understood this question.

I believe it is asking about materials which would not be disposed of as refuse. I believe it is intended to identify possible chemical or organic materials which might be improperly handled processed or disposed of. Waste materials would also include sanitary sewer waste discharges from a sewer line, septic system, RV dump station or holding tank. An additional source would be improperly maintained oil water separator. Out door storage of vehicle tires will leach particles of rubber which will be washed into catch basins and discharged into the ground. Eventually all of these

materials will reach the aquifer and into the local potable water supply. This parcel is within the well head protection zone for the Easton Water District as well as several private wells. There is an abandon well on the property which becomes a direct route to this aquifer and should be highly concerning to the County. What chemicals might be used to melt ice on sidewalks, at fueling canopies and on driveway surfaces.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so describe.

The project intends to reshape the landscape which could cause run off patterns to change. This change may cause run off from adjacent parcels or create run off to adjacent parcels that do not currently exist. Cutting 13,000 cy of material and filling 33,000 cy of material will have an effect on current drainage patterns on the parcel and in the vicinity.

4) Proposed measures to reduce or control surface, ground and runoff water, and drainage pattern impacts if any:

The applicant only addresses current conditions regarding run-on from adjacent parcels. The cut and fill portion of the proposal will change the run off patterns as they currently exist. The applicant has not addressed possibility that after the cut and fill changes the surface of the parcel, there could be run off from adjacent parcels to their parcel.

4. Plants.

c. List threatened and endangered species known to be on or near the site

Why did the applicant use the US Fish and Wildlife document to address endangered plant species on or near the project site. There are other more focused documents to address this question. The applicant must provide accurate information regarding plants on the site.

e. List all noxious weeds and invasive species known to be on or near the site

The noxious weed information is lacking complete information. It would be more informative to requested information from the Kittitas County Noxious Weed Board. I know form my own observations that bull thistle, other thistle species and scotch broom have and do grow in the Easton area.

5.) Animals

a. List any birds and other animals which have been observed on or near the site or known to be on or near the site

The applicant did not fully answer this question. Perhaps they did not understand the questions only provided Examples and that other species seen or known be the site must also be listed. There are also coyotes, skunks, hare, racoons, alligator lizards, skates, snakes, frogs, voles, gophers, ground squirrels, chipmunks, hawks, turkey vultures, northern flickers, pleated woodpeckers, downy woodpeckers, thrush, robins, finch, grosbeak, humming birds, nuthatch, and likely many other species on or near the site.

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill or hazardous waste that could occur because of this proposal?

Although the applicant described the type of activities that will take place, they **did not** explain the hazards that could occur. The applicant must clarify the risks for each activity, any hazardous condition, and probable harm to humans and surrounding areas. For example, the Easton area is a

high-risk area for wildfire. Could an explosion caused by activity at the site cause a wild fire? This would include the Propane tank location and protection from damage. Will customers using the parking spaces be hauling hazardous materials that could leak or explode, catch fire, release toxic materials into the air, or corrosive materials be leaked in the event of an equipment failure or accident? The service area will handle hazardous materials such as antifreeze, motor oil, lubricants, or other chemicals that could damage the environment in the event of an accident or mishandling. Will the onsite treatment of run-off be able to sufficiently treat fuel, oil, antifreeze, ice and snow melt chemicals without allowing them to infiltrate permeable soils, the aquifer, or well head protection areas?

a. 3) Describe any toxic or hazardous chemicals that might be stored, used or produced during the project's development, or construction, or at any time during the operating life of the project.

The applicant has not provided a complete list of toxic or hazardous chemicals. Additional items would include Propane, Diesel, gasoline, DEF, antifreeze, break fluids, lubricants, new and used oil, new and used antifreeze, storage of used tires, landscape chemicals. There will be hazardous materials on trucks entering, parking and leaving the site on a daily basis.

4) Describe special emergency services that might be required.

It makes me very uneasy to think the applicant will not need special emergency services. No private or commercial activity that involves the hazards of the proposed uses should ever think that no special emergency services are required. When ready for operation the applicant must have a safety plan in place for the protection of Easton residents, their customers, their employees' and due to the proximity to a major Interstate a plan to protect the traveling public in the event of an emergency. The Easton Fire Department is totally volunteer and has limited resources to deal with

hazardous situations such as chemical spills or contamination containment. Only a small number are certified wildland firefighters in the event of a large fire moving to or from nearby forest lands. In the event of Fire or explosion the Fire Department could have a difficult time accessing the site as there is only one access to Sparks Road and that is the I 90 over pass or west bound off ramp at Exit 90. Access to that type of emergency would likely be hampered by a large number of vehicles trying to leave the site. In the case of a required evacuation, residents only have one road for that process which is Sparks Road and either over I 90 or onto I 90 to possibly reach safety. Toxic airborne chemicals would create an epically concerning situation.

There are limited resources available for law enforcement in the Easton area and in the event of an emergency there a much-delayed response time. If I 90 is closed there will be no response by law enforcement. If there is a traffic incident between Easton and the closest responding officer there will also be a long delay in response.

In the event an incident (natural or manmade) were to damage either the Keechelus or Kachess dam, there could be catastrophic flooding to the Easton area. The only designated evacuation routes are unimproved roads which are not suitable for autos, RVs or semi-trucks.

5) Proposed measures to reduce or control environmental health hazards, if any:

Measures proposed to reduce or control environmental health hazards are pretty vague. They do not address any safety plans, facility maintenance or measures to insure the human or environmental health affected by the operation of the facility. The applicant may not understand that when tasks are done as required, dangerous accidents or malfunctions happen and can have devastating results. An emergency response plan should be prepared with required employee training.

b. Noise

2) What types and levels of noise would be created or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other?) Indicate what hours noise would come from the site.

The types and levels of noise created by project at completion are not expressed accurately. The applicant expects a large volume of vehicles entering and exiting the site at an almost continuous level. That is a lot of noise. There will be trucks idling on an almost continuous basis. Those actions are not the same as a vehicle just passing by. Entering and exiting the facility will require a noise level much more intense. The tire and service activities will also create a level of noise that is not a part of the Rural Character the Growth Management Act, Land Use and Zoning Code require to maintain the vision put forth by those regulations. The noise of an air compressor and air tools along with tire changing activities are an urban sound. The noise generated will disturb every adjacent property owner, their activities and businesses.

3) Proposed measures to reduce or control noise impacts, if any:

The applicant did not answer this question completely. It appears they offer no effort to control or reduce the noise impact of their business after construction is complete.

8. Land and Shoreline Use

a. What is the current use of the site and adjacent properties? Will the proposal affect the current land uses on near by or adjacent properties. If so, describe.

The applicant did not provide a complete answer to this question. Current adjacent property uses are more accurately described here.

The 121.58 acres to the north are WSU Trust land managed by DNR.

The 22 acres to the East are a recreational property with camping, RV and lodge accommodations that was established in 1975 and has continued to provide such services since 1975. The property has purchased from the long-time owners and is currently undergoing an extensive remodel, renovation and upgrade project to better serve their customers, some of whom have been patronizing the facility for many years.

The property directly south is the entrance road to the Silver Ridge Ranch Lodge.

The Rural Character as viewable by air traffic and users of the Easton State Airport will be completely destroyed. Even with screening views from Sparks Road and I 90 will change substantially degrading the Rural Character as defined in State and County regulations.

The applicant has made it clear they expect the proposed facility to attract traffic that may have used other current businesses on Sparks Road. That would certainly have a devastating affect to those businesses and the special rural quality of the Easton community as it has been designated by the GMA, the County's Comprehensive Plan and the Land Use and Zoning regulations.

b. Has the project site been used as working farmlands or working forest lands? If so describe. How much agricultural or forest land of long-term significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or non-forest use?

The current owner of the property has had a recent Forest Practices Permit to log the property. FPA # 2703309. It was initiated August 18, 2005 and was last renewed to be in place through 2015.

c. Describe structures on the site.

Although there are no structures currently on the site, there is an abandoned well. The well house collapsed during heavy winter snowfall and has left the well head exposed. The well will have to be remediated per DOE requirements to prevent contamination to the local aquifer and well head protection zone.

e. What is the current zoning classification of the site?

f. What is the current Comprehensive designation of the site?

These questions were only superficially answered. The property is Zoned General Commercial. The property is in a Type III LAMRID for which Kittitas County Code 17.15.070 limits the uses, types of surfaces and quantity of surface coverage. Other limits governed by 17.15.070.1 are described in 17.15.070.2 note 48 of the County's code which include the size or retail space and require those activities be wholly enclosed in that space. I believe the fuel canopies or the vehicle parking activities are by definition regarded as retail activities, neither of which can be wholly enclosed in a building. The Vehicle Service and Repair proposed is governed by 17.15.070.2 note 11. "Permitted when conducted wholly within an enclosed building (excluding off-street parking and loading areas)." Fuel and Service components are not allowed uses, as they cannot be wholly enclosed in a building. The property's Land Use is Rural LAMRID Type III. To determine the actual uses the applicant has to refer to the Allowed Use Table for that designation and Zone which is found in Kittitas County Code 17.15.070.1 and refer to the notes in 17.15.070.2. WAC 365-196-426.6.c.iii and RCW 36.70.A.070 (5) (d) iii, limit Type 3 LAMRID uses to

isolated small-scale businesses and cottage industries. The proposed development certainly does not represent that type of use.

i. Approximately how many people would reside of work in the completed project?

It will be difficult to attract 50 employees to the Easton area. There is little affordable housing which is not already occupied. Employees traveling from out of the Easton area would find it almost impossible to get to for from work during I 90 closures that can last for several days at times.

J. Approximately how many people would the completed project displace?

The owners and guests of Silver Ridge Ranch would likely be displaced due to the incompatibility of the proposed development and the long-term historical use of their property. Current active business owners and employees would certainly be displaced as the applicant intends their project to funnel traffic to their facility.

L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

The applicants answer to this question is very misleading and demonstrates an inability to read and understand Kittitas County Code and Comprehensive Plan along with the State's Growth Management Act. Kittitas County spent a substantial amount of time and money to bring its's Zoning and Land Use regulations into compliance with the Growth Management Act. The applicants disregard for that process is apparent given the answer provided. The request is absolutely not compatible with existing zoning. By the answer "and proposed zoning in the Comprehensive Plan" is clear they are attempting making false statements as a basis for the request. The application is definitely not compatible with the

Comprehensive Plan or the Growth Management ACT The Variance Request is **excessive and is more like a land use change and rezone request.**

Those types of requests are processed in an entirely different manner and likely would not be approved.

10. Aesthetics

b. What views in the immediate vicinity would be altered or obstructed?

Views in the immediate vicinity would be greatly altered. The applicants plan to use the trees along Sparks to obscure the view of their finished project is all but impossible to achieve. The stand of trees is only about 10 feet deep and consists of small fir trees growing very close together. Thinning would be required to achieve a healthy stand of trees. The wildland interface code would require removing lower limbs to reduce wild fire hazards. Both of those action would likely remove any value for obscuring the sight of an urban style development. The view from the long-established Silver Ridge Ranch property would be absolutely unthinkable as there is no screening. It would take years to propagate vegetation to provide adequate screening. Views from air traffic and planes using Easton State Airport would be greatly impacted. Views from area recreational areas, roads and trails would be of a large urban facility not the designated rural views where the landscape dominates over the built environment.

What does the applicant when they make the statement, "The site is off the road"??? I hardly think anyone would believe it is proposed to be located on the road. Off the road physically does not negate views from other vantage points where such a facility is so unexpected, out of place and unpleasant to see in such a beautiful rural environment.

11. Light and Glare

b. Could light or glare from the finished project be a safety hazard or interfere with views?

Light will greatly interfere with views of the night sky which is a key element to achieving Rural Character. The light will be disturbing to patrons of near by camp grounds and State Park Visitors. The view of the lighting at night, from the directly adjacent Silver Ridge Ranch and Lodge, would be devastating to their business. Even with the surface being somewhat lower the roadway and with down facing lights the facility will still be visible from nearby I 90 and other properties in the area. The amount of proposed fill will raise the surface of the facility to level nearer to that of Sparks Road allowing more light to be seen off site.

12. Recreation

a. What designated and informal recreational opportunities are there in the vicinity?

Additional recreational activities include Easton RV Park, Silver Ridge Ranch Camping and Lodge, which directly abuts the proposal, fishing, boating, hiking, biking, UTV and ATV riding, snowmobiling, snow Shoeing, horseback riding and recreational airport use and informal camping.

b. Would the proposed project displace any existing recreational uses? If so describe.

The applicant has limited response to this question to the possibility of displaced recreation on their parcel. There are other recreational activities that will be negatively affected. Recreational use of Silver Ridge Ranch and Lodge Facilities. Use of licensed UTVs and ATVs and snowmobiles on Sparks Road. Walking and Riding bicycles would also be greatly impacted by the

addition of constant large vehicle traffic using Sparks Road which does not have shoulders for the safety of those users. To develop or require bicycle or pedestrian accommodations would further demonstrate that the proposed development is actually Urban. The views from local roads and trails on the locally higher elevations areas of the vicinity would degrade the expected vision of a small rural community with limited development.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any?

“None Proposed” is the applicants response. I do not believe there are any possible ways to reduce or control impacts to recreation in the Easton area which would be created by this project. The project is urban in size and any impact controls would diminish the expected opportunities to that of a city street.

14 Transportation

b. Is the site of affected geographic area currently served by public transportation? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

The Easton Area is not served by any form of public transportation. The applicant has cited Hope Source as a transportation provider. Hope Source is a private non-profit organization which has provides necessary transportation to low-income households. I personally have no idea where the nearest transit stop might be, but is not anywhere near Easton.

c. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so describe (include weather public or private)

Although the applicant indicates they do not believe improvements will be necessary to facilitate their development they have ignored several issues. The WSDOT signs that alert traffic to chain requirement and other traffic related information operate before Exit 70 in I 90. Not all drivers are local nor do they have access to other means of receiving the information posted on those signs. If travelers leave the facility and access I 90 West bound they could be unaware of travel restrictions posted on the message signs. I don't even want to consider the additional traffic hazards that will create. The WSDOT I 90 over pass at Exit 70 is past its useful life and is in poor condition. The additional 8,560 mostly heavy weight loads using that interchange will quickly further degrade that bridge. Kittitas County should also be concerned about the additional heavy truck traffic on Sparks Road. Those trucks will reduce the life of that portion of Sparks Road and require additional maintenance. The great number of heavy truck traffic using tire chain in winter will also cause premature wear on the surface of the road.

d. Will the project or proposal use (or occur in the immediate vicinity of) water, rail or air transportation. If so generally describe.

Just to clarify the answer regarding the airport. Easton State Airport is an Emergency Airport that is used recreationally by the public. The airport is also used as a base for wildland fire training and in case of a fire they use as their base for deployment and camp facilities. Emergency medical air lifts are also done at the Airport. Clear access to the Airport via the easement between the applicant's parcel, and the Silver Ridge Ranch parcel is essential.

e. How many vehicular trips per day would be generated by the completed project or proposal? If known indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles) What data or transportation models were used to make these estimates?

It does not appear a Traffic Study has been submitted for this project. That data must available be to demonstrate the monumental difference between existing and projected volumes. WSDOT and Kittitas County cannot make truly informed decisions regarding required improvements without that information. Adding the additional 8,560 projected vehicle trips to this intersection is way out of line with the number of vehicles trips any rural non highway intersection would experience. That volume of traffic is not reflective of Rural Character.

g. Proposed measures to reduce or control transportation impacts, if any:

What are the frontage improvements along Sparks Road that the applicant believes will control transportation impacts and insure the Rural Character?

A new driveway access is required for ingress and egress. Entry and exit maneuvers will impede traffic on Sparks Road. Semi-trucks entering and leaving the project will require a large area to safely travel onto the traveled the roadway. Those movements generally cause traffic on the roadway to slow or even stop during such activity. I do not see how the applicant will be able to reduce or control impacts of the additional traffic to and from their proposed project.

16. Utilities

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

The parcel is not in the Easton Water District Service Area or in the district itself. Provisions for suppling water to the project will require a process which includes evaluation of available quantity, engineering and infrastructure installation all requiring a signed contract with the water district. The proposal will need a quantity of water for operation that would

be considered an Urban Level of Service. No other customer of the Easton would even come close to the excessive consumption required for this proposal.

Kittitas PUD does not provide power service to the Easton area.

Puget Sound Energy provides power service to the Easton area. Although the applicant has not chosen to acknowledge the future of electric vehicle energy needs that will have to be installed at the facility to continue providing travelers with their services. Without charging services, this facility will likely not be able to operate as green energy requirements evolve. The installation of infrastructure to provide that service on a level to provide charging services would be another egregious action requiring Urban Services to allow Rural Development. Puget Sound Energy does not currently have infrastructure in the Easton area that would support such service. Puget Sound Energy may not currently have enough infrastructure in the Easton area to provide service the applicants proposal.