Kimley»Horn

## MEMORANDUM

To: Chad Bala, Community Development Services Director

Jeremy Jonston, Long Range Planner

From: Kimley-Horn and Associates, Inc.

Date: March 4, 2026

Subject: March 4, 2026 – 2026 Periodic Comprehensive Plan Update Briefing

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Between January 29th, 2026, to March 2nd, 2026, Kittitas County initiated a 30-Day Comment period on the Draft Comprehensive Plan Update, new Climate Element and Easton Subarea Plan. The draft development regulations and the draft critical areas ordinance were not included as part of this 30-Day comment period. Kimley-Horn supported the County in collecting comments. Comments were submitted via the online form at KittitasCounty2026.com, email to comments@kittitascounty2026.com or by mail or email to Kittitas County Development Services. Table 1. is a list of all submitted comments for the 30-Day comment period. The attached Exhibit A contains all PDFs, emails, and online form comments submitted to the County.

**Table 1. Public Comments for 30-Day Comment Period for Kittitas County Comprehensive Plan, Climate Element, and Easton Subarea Plan.**

| Comment ID | Name | Organization/Address | Comment Method | Date Received |
|---|---|---|---|---|
| 001 | Tim Trohimovich | Futurewise | Email | 3/2/2026 |
| 002 | Carryn Vande Griend | Puget Sound Energy | Email | 3/2/2026 |
| 003 | Gina Peckman | Friends of Easton | Email | 3/2/2026 |
| 004 | Sara Vickers | Kittitas Reclamation District | Email | 3/2/2026 |
| 005 | Gina Peckman | Friends of Easton | Email | 3/1/2026 |
| 006 | Debbie Bogart | Resident | Email | 3/1/2026 |
| 007 | Marge Brandsrud | Easton Resident | Email | 3/1/2026 |
| (Duplicate of 007) | Dave Brandsrud | Easton Resident | Email | 3/1/2026 |
| 008 | Jill Merwin | Easton Resident | Email | 2/27/2026 |
| 009 | Scott Downes | WDFW | Email | 2/24/2026 |
| 010 | Pat Kelleher | Resident | Email | 2/19/2026 |
| 011 | Tricia Sears | Washington Geological Survey | Email | 2/13/2026 |
| 012 | Gina Peckman | Easton Resident | Email | Unknown |

**Comment #001**

Gmail

**Kittitas County 2026 Comments <comments@kittitascounty2026.com>**

# Comments on the Kittitas County 2026 Comprehensive Plan update

1 message

**Tim Trohimovich** <Tim@futurewise.org> Mon, Mar 2, 2026 at 1:30 PM
To: "comments@kittitascounty2026.com" <comments@kittitascounty2026.com>
Cc: Brooke Frickleton <brooke@futurewise.org>

Dear Staff:

Enclosed please find Futurewise's comments on the current version of Kittitas County 2026 Comprehensive Plan update. Thank you for considering our comments.

Please let me know if you need anything else.

Tim Trohimovich, AICP (he/him)
Director of Planning & Law

30 future wise

Futurewise
1201 3rd Ave #2200, Seattle, WA 98101
(206) 343-0681
tim@futurewise.org
**futurewise.org**
connect:

**2026-03-02 FW Comments on Kittitas Cnty Comp Plan Update.pdf**
246K

future wise
1201 3rd Ave #2200, Seattle, Washington 98101
p. (206) 343-0681
futurewise.org

March 2, 2026

Kittitas County Community Development Services
411 N Ruby St, Suite 2
Ellensburg, Washington 98926

Dear Staff:

**Subject: Comments on the Kittitas County 2026 Comprehensive Plan update.**
Sent via email: comments@kittitascounty2026.com

Thank you for the opportunity to comment on Kittitas County 2026 Comprehensive Plan update. We support the update. We also have recommendations to improve the comprehensive plan and development regulations update.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable, and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters across Washington State including Kittitas County.

## Summary of Futurewise Comments and Recommendations

- The Vision Statement should call more clearly for maintaining and enhancing the County's agricultural industry. This industry is an important part of the county economy. So maintaining and enhancing the industry is an important economic development measure. Please see page 3 of this letter for more information.
- Recognize that clustering will not protect working farms and farmers. This is because clusters can convert agricultural lands to nonagricultural uses and increase incompatible residential uses. Please see page 3 of this letter for more information.
- Futurewise supports policies calling for predevelopment review of sites with the potential for cultural resources and consultations with Indian tribes and nations and the State of Washington Department of Archaeology and Historic Preservation on their protection. This will help protect important cultural resources. Please see page 4 of this letter for more information.
- Please clarify the differences between Natural Resource Lands and Rural Areas. This is necessary to conserve natural resource lands. Please see page 4 of this letter for more information.

- The policies and narrative on the Designation and De-designation of Agricultural Lands of Long-Term Commercial Significance need to be updated to comply with WAC 365–190–050. This is necessary to protect important farmland which is the basis of the agricultural industry. Please see page 5 of this letter for more information.
- Table 4-2 on page 81, the comprehensive plan, and development regulation updates must identify sufficient land for housing affordable to families earning zero to 30 percent, 30 to 50 percent, 50 to 80 percent, 80 to 100 percent, and 100 to 120 percent of the Area Median Income (AMI). This is necessary to provide adequate opportunities for housing for all. Please see page 6 of this letter for more information.
- Table 4-2 on page 81 should only including housing types documented to be affordable for the various income categories as planned affordable housing. This is necessary to provide adequate opportunities for housing for all. Please see page 7 of this letter for more information.
- Affordable housing should be focused in cities and urban growth areas. It is not possible to economically provide affordable housing in rural areas. Please see page 8 of this letter for more information.
- Please address the other requirements of RCW 36.70A.070(2) in the Housing Chapter. This is necessary to provide housing for all. Please see page 9 of this letter for more information.
- The climate and resiliency chapter requires more specificity and programs and development regulations to comply with RCW 36.70A.070(9)(e)(i). Please see page 10 of this letter for more information.
- The climate and resiliency chapter must prioritize actions that benefit overburdened communities to comply with RCW 36.70A.070(1) and RCW 36.70A.070(9)(e)(i). Please see page 11 of this letter for more information.
- The climate and resiliency chapter must address climate caused decreases in water supplies and help address the increased demand for agricultural water supplies. This is necessary to comply with RCW 36.70A.070(9)(e)(i). Please see page 11 of this letter for more information.
- Adopt policies, programs, and regulations to achieve environmental justice. We have recommended principles to incorporate into the policies, programs, and regulations. Please see page 12 of this letter for more information.
- Adopt policies, programs, and regulations to address increased wildfire risk. This is necessary to protect people and property from wildfire risk and comply with RCW 36.70A.070(9)(e)(i). Please see page 12 of this letter for more information.

## Detailed Comments on Chapter 1 Introduction.

### The Vision Statement should call more clearly for maintaining and enhancing the County's important agricultural industry. See page 16.

Futurewise supports the vision statement on page 16. We do recommend that it be strengthened by referencing "resource lands" which are an important part of the county's economy and character. The vision statement includes "rural working lands" and "working lands" which are rural land use designations and fail to include agricultural, forest, and mineral resource lands.[1] We suggest that references to rural working lands and working lands be changed to "resource lands and rural working lands" "resource lands and working lands." This will better encapsulate the intent to protect the county's important agricultural, forest, and mineral resource industries as the county intends and as the Growth Management Act requires.[2]

### Clustering will not protect working farms and farmers.

Page 12 of the Introduction states that agricultural clustering preserves farmland. This is not supported by peer-reviewed studies and other evidence. These papers show that cluster subdivisions do not protect working farms, farmers, or agricultural lands.[3] The additional residential growth allowed on agricultural lands of long-term commercial significance increases demands for limited water and incompatibilities with agricultural uses.[4] In several decisions the Western

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[1] Proposed Chapter 2 Land Use p. 22.

[2] RCW 36.70A.060(1).

[3] Thomas L. Daniels, *Where Does Cluster Zoning Fit in Farmland Protection?* 63 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 129, 136 (1997) enclosed at the link on the last page of this letter with the filename: "JAPA Where Does Cluster Zoning Fit into Farmland Protection.pdf." The Journal of the American Planning Association is peer reviewed. Journal of the American Planning Association Instructions for authors p. 3 & p. 4 of 9 enclosed in an additional email with the filename: "JAPA Instructions for Authors.pdf."

[4] Tom Daniels, *What to Do About Rural Sprawl?* p. 1 of 4 (Paper Presented at The American Planning Association Conference, Seattle, WA: April 28, 1999) enclosed at the link on the last page of this letter with the filename: "Daniels What to Do About Rural Sprawl.pdf;" Hall, S.A., Adam, J.C., Yourek, M.A., Whittemore, A.M., Yorgey, G.G., Scarpare, F., Liu, M., McLarty, S., Asante-Sasu, C., McClure,S., Turk, J., Haller, D., Padowski, J., Deshar, R., Brady, M.P., Rajagopalan, K., Barber, M.E., Weber, R., Stockle, C.O., Goodspeed, H.L., Gustine, R.N., Kondal, A., Yoder, J., Deaver, B., Downes, M., Tarbutton, S., Callahan, M., Price, P. Roberts, T., Stephens, J., and Valdez, W., *2021 Washington State Legislative Report: Columbia River Basin Long-Term Water Supply and Demand Forecast* p. 51 (Publication No. 21-12-006, Washington Department of Ecology, Olympia, WA: 2022) last accessed on Feb. 27, 2026, at: https://apps.ecology.wa.gov/publications/SummaryPages/2112006.html and at the link on the last page of this letter with the filename: "2112006.pdf."

Growth Management Hearings Board held that residential clusters in agricultural lands of long-term commercial significance violated the Growth Management Act where the density was greater than one dwelling unit per ten acres[5] or where the land in the cluster was prime farmland soils or where land where agriculture could otherwise take place.[6]

## Detailed Comments and Recommendations on Chapter 2 Land Use

### Futurewise supports policies calling for predevelopment review of sites with the potential for cultural resources and consultations with Indian tribes and nations and the State of Washington Department of Archaeology and Historic Preservation on their protection. See pages 31 and 32.

Cultural resources are important to maintain existing cultural traditions and our appreciation of the past. We strongly support the policies calling for predevelopment review of sites with the potential for cultural resources and consultations with Indian tribes and nations and the State of Washington Department of Archaeology and Historic Preservation over their protection.

## Detailed Comments and Regulations on Chapter 3 Rural and Resource Lands

### Clarify the differences between Natural Resource Lands and Rural Areas. See pp. 47 – 51.

The Growth Management Act requires the designation and protection of natural resource lands and a rural element.[7] We recommend that the Rural and Resources Lands element better distinguish between these two different geographies.

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[5] *Vince Panesko, et al., v. Lewis County, et al.*, WWGMHB Case No. 00-2-0031c, *Eugene Butler, et al. v. Lewis County*, WWGMHB Case No. 99-2-0027c, & *Daniel Smith, et al. v. Lewis County*, Western Washington Growth Management Hearings Board (WWGMHB) No. 98-2-0011c, Final Decision and Order (March 5, 2001), at p. *16, 2001 WL 246707 p.*10 last accessed on March 2, 2026, at: https://eluho2022.my.site.com/casemanager/s/eluho-document/a0T82000000I2s5EAC/20010305-final-decision-and-order.

[6] *Vince Panesko, et al. v. Lewis County*, WWGMHB Case No. 00-2-0031c & *Eugene Butler, et al. v. Lewis County*, WWGMHB Case No. 99-2-0027c Order Finding Noncompliance and Imposing Invalidity (Feb. 13, 2004), at pp. 21 – 27 of 49, 2004 WL 586071, p. *13 – 15 last accessed on March 2, 2026, at: https://eluho2022.my.site.com/casemanager/s/eluho-document/a0T82000000I2sAEAS/20040213-order-on-compliance. See also RCW 36.70A.177.

[7] RCW 36.70A.170; RCW 36.70A.060; RCW 36.70A.070(5).

**The policies and narrative on the Designation and De-designation of Agricultural Lands of Long-Term Commercial Significance need to be updated to comply with WAC 365-190-050. See pages 63 and 64.**

One of the purposes of the periodic updates to comprehensive plans and development regulations is to incorporate "provisions" adopted or amended since the last periodic update.[8] Since the last Kittitas County comprehensive plan update, the Washington State Department of Commerce amended WAC 365-190-050 to expand the soil types that indicate an area has long-term commercial significance for agriculture to include farmlands of statewide importance soils in addition to prime and unique farmland soils.[9] The soils in each of these classifications can be found in Farmland Classification—Kittitas County Area, Washington which can be found at the link on the last page of this letter with the filename: "20260227_18060506402_43_Farmland_Classification Kitittas.pdf."

Both prime and unique farmland soils and farmlands of statewide importance soils are high quality agricultural soils.[10] U.S. Department of Agriculture regulations generally define prime farmland soils as:

> General. Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and is also available for these uses (the land could be cropland, pastureland, rangeland, forest land, or other land, but not urban built-up land or water). It has the soil quality, growing season, and moisture supply needed to economically produce sustained high yields of crops when treated and managed, including water management, according to acceptable farming methods. In general, prime farmlands have an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, acceptable acidity or alkalinity, acceptable salt and sodium content, and few or no rocks. They are permeable to water and air. Prime farmlands are not excessively erodible or saturated with water for a long period of time, and they either do not flood frequently or are protected from flooding.[11]

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[8] *Thurston Cnty. v. W. Washington Growth Mgmt. Hearings Bd.*, 164 Wn.2d 329, 344, 190 P.3d 38, 45 (2008); RCW 36.70A.130(1)(a).
[9] Washington State Register (WSR) 23-08-037 (Filed March 29, 2023) enclosed at the link on the last page of this letter with the filename: "WSR 23-08-037 pp 4 to 11.pdf" *see* WAC 365-190-050(3)(c)(i) (2023) on page [10] of that file.
[10] 7 Code of Federal Regulations (CFR) § 657.5(a) & (c) last accessed on Feb. 27, 2026, at: https://www.ecfr.gov/current/title-7/subtitle-B/chapter-VI/subchapter-F/part-657/subpart-A/section-657.5.
[11] 7 CFR § 657.5(a)(1).

Similarly, the U.S. Department of Agriculture regulations define farmlands of statewide importance soils as:

> Additional farmland of statewide importance. This is land, in addition to prime and unique farmlands, that is of statewide importance for the production of food, feed, fiber, forage, and oil seed crops. Criteria for defining and delineating this land are to be determined by the appropriate State agency or agencies. Generally, additional farmlands of statewide importance include those that are nearly prime farmland and that economically produce high yields of crops when treated and managed according to acceptable farming methods. Some may produce as high a yield as prime farmlands if conditions are favorable.[12]

As these U.S. Department of Agriculture regulations provide, prime farmland and farmlands of statewide importance soils are high quality agriculture soils. That is why WAC 365-190-050(3)(c)(i) calls for these high-quality soils to be designated and zoned as agricultural lands of long-term commercial significance. We recommend that the criteria be based on prime and unique farmland soils and farmland of statewide importance soils in designating agricultural lands of long-term commercial significance.

## Detailed Comments and Recommendations on Chapter 4. Housing

### Table 4-2 on page 81, the comprehensive plan, and development regulation updates must identify sufficient land for housing affordable to families earning zero to 30 percent, 30 to 50 percent, 50 to 80 percent, 80 to 100 percent, and 100 to 120 percent of the Area Median Income (AMI).

The Growth Management Act in RCW 36.70A.070(2)(c) requires the county comprehensive plan, and the county development regulations,[13] to "[i]dentif[y] sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes[.]" RCW 36.70A.070(2)(d) requires the county comprehensive

[12] 7 CFR § 657.5(c).
[13] RCW 36.70A.130(1)(a), (e).

plan, and the county development regulations,[14] to: "(d) Make[] adequate provisions for existing and projected needs of all economic segments of the community, including: (i) Incorporating consideration for low, very low, extremely low, and moderate-income households[.]" "'Extremely low-income household' means a single person, family, or unrelated persons living together whose adjusted income is at or below 30 percent of the median household income adjusted for household size ..."[15] "'Very low-income household' means a single person, family, or unrelated persons living together whose adjusted income is at or below 50 percent of the median household income adjusted for household size ...."[16] "'Low-income household' means a single person, family, or unrelated persons living together whose adjusted income is at or below 80 percent of the median household income adjusted for household size ...."[17] "Moderate-income household" means a single person, family, or unrelated persons living together whose adjusted income is at or below 120 percent of the median household income adjusted for household size ...."[18]

It is important to analyze housing needs and capacity by these categories because different housing types and different levels of subsidies and incentives are needed to fund housing affordable to families in the different income categories.[19] So Table 4-2 should be broken out by the income categories in RCW 36.70A.070(2)(c) and (d).[20]

**Table 4-2 on page 81 should only including housing types documented to be affordable for the various income categories as planned affordable housing.**

RCW 36.70A.070(2)(c) requires the county comprehensive plan, and the county development regulations,[21] to "[i]dentif[y] sufficient capacity of land for housing

[14] RCW 36.70A.130(1)(a), (e).
[15] RCW 36.70A.030(18).
[16] RCW 36.70A.030(50).
[17] RCW 36.70A.030(26).
[18] RCW 36.70A.030(30).
[19] Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 36 (Aug. 2023, updated Jan. 2026) last accessed on Feb. 26, 2026, at: https://www.commerce.wa.gov/growth-management/housing-planning/housing-guidance/ and available at the link on the last page of this letter with the filename: "1220_Book2_Housing Element Update_230823 Final_updated 260112.pdf."
[20] *Futurewise, Kian Bradley, and Trevor Reed v. City of Mercer Island*, Central Puget Sound Region Growth Management Hearings Board (CPSRGMHB) Case No. 25-3-0003, Final Decision and Order (Aug. 1, 2025) at 23 – 25 of 67 last accessed on Feb. 18, 2026, at: https://eluho2022.my.site.com/casemanager/s/eluho-document/a0Teq00000ni6fREAQ/20250801-final-decision-and-order.
[21] RCW 36.70A.130(1)(a), (e).

including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes[.]" The State of Washington Department of Commerce has documented that in moderate-cost communities to provide housing affordable to families and individuals earning 80 percent or less of the area median income requires low-rise multifamily and mid-rise multifamily housing and accessory dwelling units.[22] In moderate cost jurisdictions townhomes, duplexes, triplexes, and quadplexes can be affordable to families earning 80 to 120 percent Area Median Income (AMI).[23] Middle housing is not affordable to families earning 80 percent or less AMI.[24] Detached single family homes are only affordable to families earning more than 120 percent AMI.[25]

Table 4-2 relies in part on duplexes and triplexes to provide housing affordable to families earning 80 percent or less AMI. This is not possible. Duplexes, triplexes, and manufactured, mobile, and modular homes cannot be produced at rents affordable to families earning zero to less than 30 percent AMI or 30 to less than 50 percent AMI. We recommend focusing on low-rise multifamily and mid-rise multifamily housing and accessory dwelling units within urban growth areas.[26]

## Affordable housing should be focused in cities and urban growth areas.

Table 4-2 on page 81 allocates the unincorporated rural county 156 units of housing affordable to families earning between 50 to 80 percent AMI to be produced with duplexes and accessory dwelling units. The State of Washington Department of Commerce has documented that to provide housing affordable to families and individuals earning 80 percent or less of the area median income requires low-rise multifamily and mid-rise multifamily housing and accessory dwelling units.[27] In moderate cost jurisdictions townhomes, duplexes, triplexes, and quadplexes can be affordable to families earning 80 to 120 percent AMI.[28] Middle housing is not affordable to families earning 80 percent or less AMI.[29] In addition, there are significant water constraints and placing affordable housing in

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[22] Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 36 (Aug. 2023, updated Jan. 2026).
[23] *Id.*
[24] *Id.*
[25] *Id.*
[26] *Id.*
[27] *Id.*
[28] *Id.*
[29] *Id.*

rural areas increases transportation costs for families and transportation and public service costs for the County. We recommend that these housing targets should be reallocated to urban growth areas. Planning on affordable housing units outside urban growth areas means that the county will not achieve its affordable housing targets and there will not be opportunities for all income groups.

Similarly, the *Washington Farmworker Housing Needs Assessment* recommended that to provide more affordable farm worker housing cities should be encouraged "to increase zoning and infrastructure investments for multi-family housing within urban growth areas."[30]

Low-rise multifamily and mid-rise multifamily housing are urban densities and are only allowed in urban growth areas. Planning on providing housing affordable families earning 80 percent or less AMI in the rural area will fail. Instead these housing targets should be reallocated to urban growth areas near jobs where the affordable housing can be provided.

## Address the other requirements for housing elements in RCW 36.70A.020(2).

RCW 36.70A.020(2)(d)(ii) requires the comprehensive plan to "[d]ocument[] programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations ..." We were unable to identify the programs, actions, and gaps in local funding in the Housing Element or the Kittitas County - Housing Needs Assessment.

RCW 36.70A.020(2)(e) requires the housing element to identify "local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing ...." We were unable to identify the programs, actions, and gaps in local funding in the Housing Element or the Kittitas County - Housing Needs Assessment.

RCW 36.70A.020(2)(f) requires the housing element to "[i]dentif[] and implements policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions ...." RCW 36.70A.020(2)(g) requires the housing element to [i]dentif[y] areas that may be at higher risk of displacement from market forces

[30] BERK Consulting, *Washington Farmworker Housing Needs Assessment* p. 184 (The Washington State Department of Commerce: Jan. 2022) last accessed on Feb. 27, 2026, at: https://www.commerce.wa.gov/wp-content/uploads/2022/04/CommerceReports_CSHD_FarmworkerHousing_Final_4.26.22.pdf and at the link on the last page of this letter with the filename: "CommerceReports_CSHD_FarmworkerHousing_Final_4.26.22.pdf."

that occur with changes to zoning development regulations and capital investments ….” ; RCW 36.70A.020(2)(h) requires the housing element to "[e]stablish[] antidisplacement policies. We were unable to identify the programs, actions, and gaps in local funding in the Housing Element or the Kittitas County - Housing Needs Assessment.

## Detailed Comments and Recommendations on Chapter 10 Climate and Resiliency

### The climate and resiliency element requires more specificity and programs and development regulations to comply with RCW 36.70A.070(9)(e)(i).

RCW 36.70A.070(9)(e)(i) provides in relevant part that:

> The resiliency subelement must prioritize actions that benefit overburdened communities that will disproportionately suffer from compounding environmental impacts and will be most impacted by natural hazards due to climate change. Specific goals, policies, and programs of the resiliency subelement must include, but are not limited to, those designed to:
> (A) Identify, protect, and enhance natural areas to foster resiliency to climate impacts, as well as areas of vital habitat for safe passage and species migration;
> (B) Identify, protect, and enhance community resiliency to climate change impacts, including social, economic, and built environment factors, that support adaptation to climate impacts consistent with environmental justice; and
> (C) Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns.

Complying with these requirements will require new and amended regulations especially to protect and enhance natural areas, to protect and enhance community resiliency, and to address the natural hazards.[31]

Many of the policies are not specific as RCW 36.70A.070(9)(e)(i) requires and there are no programs. We identify several examples in the following sections.

[31] RCW 36.70A.130(1)(a).

## The chapter must prioritize actions that benefit overburdened communities.

We appreciate that 10.2.2 identifies vulnerable populations, overburdened communities, and environmental justice on pages 164 and 165. However, we did not find any actions prioritized to benefit overburdened communities or any policies or programs designed to benefit overburdened communities. Water actions will be particularly important.

## The chapter must address climate caused decreases in water supplies and help address the increased demand for agricultural water supplies.

Much of Kittitas County is in Water Resource Inventory Area (WRIA) 39.[32] The 2011 *Columbia River Basin Long-Term Water Supply and Demand Forecast* wrote:

> The types of vulnerabilities that our region is expected to face due to changes in water supply in the future are to some extent common across all Washington's watersheds. These changes in supply are driven by changes in timing of water availability within each year and, in some watersheds, the greater variation expected between years. However, the degree to which these changes are expected, and the convergence of these changes in supply with expected changes in the different demands for water are what vary across eastern Washington's watersheds.
>
> The WRIAs in the upper Yakima Basin (WRIAs 38 and 39) are expected to see such convergence. These WRIAs are expected to experience decreasing water supplies in low supply years (Figure 21), while at the same time expecting increases in agricultural water demand (Figure 23).[33]

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[32] State of Washington Department of Ecology, Water Resources Program, *WRIA 39 Upper Yakima Watershed Water Availability* p. 7 (Publication 20-11-039: Aug. 2023) last accessed on Feb. 16, 2026, at: https://apps.ecology.wa.gov/publications/UIPages/SummaryPages/2011039.html and at the link on the last page of this letter with the filename: "2011039.pdf."

[33] Hall, S.A., Adam, J.C., Yourek, M.A., Whittemore, A.M., Yorgey, G.G., Scarpare, F., Liu, M., McLarty, S., Asante-Sasu, C., McClure,S., Turk, J., Haller, D., Padowski, J., Deshar, R., Brady, M.P., Rajagopalan, K., Barber, M.E., Weber, R., Stockle, C.O., Goodspeed, H.L., Gustine, R.N., Kondal, A., Yoder, J., Deaver, B., Downes, M., Tarbutton, S., Callahan, M., Price, P. Roberts, T., Stephens, J., and Valdez, W., *2021 Washington State Legislative Report: Columbia River Basin Long-Term Water Supply and Demand Forecast* p. 51 (Publication No. 21-12-006, Washington Department of Ecology, Olympia, WA: 2022) last accessed on Feb. 27, 2026, at: https://apps.ecology.wa.gov/publications/SummaryPages/2112006.html and at the link on the last page of this letter with the filename: "2112006.pdf."

Decreasing supplies are being driven by climate change.[34]

The climate and resiliency element needs to include specific goals, policies, and programs to protect water supplies for agricultural industry and to provide water for other uses to protect and enhance community resiliency to climate change impacts including social, economic, and built environment factors as RCW 36.70A.070(9)(e)(i) requires. Unfortunately, 10.7.1 Drought on pages 169 to 170 does not comply with these requirements. It needs to be strengthened to comply with RCW 36.70A.070(9)(e)(i). We recognize that this is a significant problem that will require help from the state and federal governments. But the chapter needs to include policies and programs to address these problems and call on the needed assistance.

These recommendations will help address the agricultural stakeholders concern that that water availability and security are the most significant long-term barriers for the agricultural industry, exacerbated by prolonged drought, reduced snowpack, and uncertainty around water rights.[35]

## Adopt policies and programs, and regulations to achieve Environmental Justice. Please see pages 164 – 165 and 168.

We appreciate and support the environmental justice narrative on pages 164 – 165 and 168. However, RCW 36.70A.070(1) requires that "[t]he land use element must give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities." RCW 36.70A.070(9)(e)(i) requires that the resiliency subelement "must" "[i]dentify, protect, and enhance community resiliency to climate change impacts, including social, economic, and built environment factors, that support adaptation to climate impacts consistent with environmental justice[.]" However, the narrative does not provide for how environmental justice will be achieved and the elements do not include policies and programs to achieve environmental justice. We suggest adding policies and programs to achieve the following principles:

- When planning for and siting uses with adverse environmental impacts direct those uses away from areas with significant health disparities and adversely impacting uses and equitably distribute the new uses.

[34] *Id.* p. ES-3.
[35] Chapter 1 Introduction p. 12.

- For uses that cannot be located in a different location, such as highway expansions, mitigate adverse impacts including in those areas with significant health disparities.
- Equitably site beneficial uses such as trails, parks, and schools and prioritize new investments in underserved areas.
- Equitably plan for capital facilities and invest in underserved or overburdened areas.
- Protect the resources needed by all communities including areas experiencing environmental health disparities and by underserved areas such as surface and ground water quality and quantity.
- Meaningful involve all affected people in these decisions and comprehensive plan updates.

## Adopt policies, programs, and regulations to address increased wildfire risk. See 10.7.5 Wildfire on page 171.

Because of climate change and urban development in hazard-prone areas, insurance is becoming increasingly difficult to get for housing and development in these areas limiting the ability sell or use these developments.[36] We need to direct growth away from these areas. We recommend a new policy to address this need and RCW 36.70A.070(9)(e)(i)(C) to read as follows:

<u>XX Direct growth away from natural hazards created or aggravated by climate change, including landslides, flooding, areas likely to experience a concentration of smoke, wildfire, and other localized effects of changes to temperature and precipitation patterns by not expanding urban growth areas into areas subject to these hazards, not increasing the intensity or density of uses in these areas, and not designating or zoning these areas for residential development or other types of urban growth.</u>

In addition, the wildfire policies are not specific as RCW 36.70A.070(9)(e)(i) requires. For example, CR-P16 calls on the County to "[i]dentify and implement strategies for reducing wildfire risk in the wildland-urban interface." But the time

[36] Mona Hemmati, Ian P. Gray & Steven G.Bowen, *The growing void in the U.S. homeowners insurance market: who should bear the rising cost of climate change?* 4:35 NPJ CLIMATE ACTION p. 1 (2025) last accessed on March 2, 2026, at: https://www.nature.com/articles/s44168-025-00231-8 and available at the link on the last page of this letter with the filename: "s44168-025-00231-8.pdf." This online journal is peer-reviewed. Nature portfolio peer review webpage last accessed on Feb. 9, 2026, at: https://www.nature.com/nature-portfolio/editorial-policies/peer-review and at the link on the last page of this letter with the filename: "Peer Review _ Nature Portfolio.pdf."

to identify the strategies is now and no specific strategies were identified.[37] This violates RCW 36.70A.070(9)(e)(i) and RCW 36.70A.130(1)(a) and (5)(c).

Further, RCW 36.70A.070(1) provides in part that "[t]he land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to, adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes, and protecting existing residential development and infrastructure through community wildfire preparedness and fire adaptation measures." This list could be developed into specific policies and programs based on that policy.

Thank you for considering our comments. If you require additional information, please contact me at email: tim@futurewise.org or telephone (206) 343-0681.

Very Truly Yours,

Tim Trohimovich, WSBA No. 22367
Director of Planning & Law

Enclosures at this link:

https://futurewiseorg.sharepoint.com/:f:/g/IgC9IcHrq3K1QZWcczX5ct96Aa915NYFS_2iGK6L4tlqgwI?e=H7eqe2

[37] *Futurewise, Kian Bradley, and Trevor Reed v. City of Mercer Island*, CPSRGMHB Case No. 25-3-0003, Final Decision and Order (Aug. 1, 2025) at 38 of 67.

Comment #002

Gmail

**Kittitas County 2026 Comments <comments@kittitascounty2026.com>**

# Kittitas Comp Plan comments from PSE

1 message

**Vande Griend, Carryn** <Carryn.VandeGriend@pse.com> Mon, Mar 2, 2026 at 12:59 PM
To: "comments@kittitascounty2026.com" <comments@kittitascounty2026.com>
Cc: Jeremy Johnston <jeremy.johnston@co.kittitas.wa.us>

Kittitas County planning staff,

Please see PSE's comments on Kittitas County's draft comprehensive plan. We would be happy to provide further feedback or clarification during the drafting process.

Thank you for providing the opportunity to comment.

Carryn Vande Griend

**Carryn Vande Griend**

PSE Local Government Affairs

Central & Eastern Washington

Carryn.VandeGriend@pse.com

509.218.9012

**Kittitas County comp plan_PSE comment letter_3.2.26.pdf**
159K

Comment #002

PUGET SOUND ENERGY

Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

March 2, 2026

Kittitas County Community Development Services
411 N Ruby St, Suite 2
Ellensburg, WA 98926

Dear Kittitas County Commissioners and Planning Staff,

Puget Sound Energy (PSE) appreciates the opportunity to provide comment on the Utilities Chapter of the Kittitas County Draft Comprehensive Plan. As the local electric utility serving much of the county, PSE supports the County's efforts to plan for reliable, resilient, and affordable utility infrastructure that meets the needs of existing and future residents while respecting environmental and community values.

To that end, we respectfully submit the following comments on the Draft Comprehensive Plan policies

*U-P4: Encourage joint electric utility construction standards for all electrical infrastructure constructed in the urban growth area. In the interim, Puget Sound Energy and the Kittitas County Public Utility District will allow the City of Ellensburg to review any new construction in the urban growth area.*

PSE will continue to comply with applicable regulations governing electric infrastructure in urban growth areas. The draft policy references a review process that is unclear as it applies to the Cle Elum and Kittitas UGAs. We respectfully request clarification regarding the specific review expectations and processes for those areas to ensure predictability and consistency in project planning and permitting.

*U-P5: Coordinate with other utilities to create a County-wide utilities location map using GIS mapping.*

PSE supports coordination with the County on utilities planning and recognizes the value of accurate mapping. However, we are unable to comply with a blanket requirement to provide GIS utility data for County publication due to privacy, security, and critical infrastructure protection requirements. PSE is willing to work collaboratively with the County to respond to individual data requests in accordance with our established data-sharing protocols.

*P7: Advocate for avoiding, where possible, routing major electric transmission lines above 55 kilovolts through urban areas and critical areas.*

PSE is subject to extensive state and local permitting requirements that prioritize avoiding critical areas unless no reasonable alternative exists. While we support thoughtful siting practices, it is important that the Comprehensive Plan maintain flexibility to allow for infrastructure decisions that ensure continued access to safe, reliable, and affordable power as regional load and capacity demands increase.

*U-P16: Any and all easement rights shall be acquired under normal lawful procedures. Process permits and approvals for all utility facilities in a fair and timely manner, and in accordance with the development regulations that ensure predictability and project concurrency. Trespass on utility easements shall be discouraged. Kittitas County reserves the right to review all applications for utilities placed within or through the County for consistency with local policies, laws, customs, and culture.*

PSE appreciates the County's stated commitment to timely permit processing and enforcement of utility easements. We comply with all applicable code and regulatory requirements. However, we seek clarification regarding the scope

Comment #002

of additional County review for “consistency with local policies, laws, customs, and culture,” as this language may introduce uncertainty without further definition.

*U-P17: It is the position of Kittitas County that it is inappropriate for utilities to over or under build other utilities. A specific example of such requirements may be found in RCW 35A.14.900 and other state laws.*

PSE requests clarification of the terms “over build” and “under build” as used in this policy. The cited statutory example (RCW 35A.14.900) relates specifically to annexation scenarios, in which county franchises are replaced by city franchises. Additional context would help utilities better understand how this policy is intended to apply outside of annexation circumstances.

*U-G7: Plan for, coordinate, and allow the expansion of solar production, small nuclear and wind facilities to improve the resilience of Kittitas County. Ensure codes encourage upfront mitigation for project impacts and are properly sited.*

PSE appreciates the County’s support for solar, wind, and small nuclear resources. We would also advocate for the inclusion of battery energy storage systems to improve system reliability and community resilience. Energy storage technologies play an increasingly important role in supporting grid stability, integrating renewable generation, managing peak demand and improving outage response.

PSE supports the policies under this goal that direct the County to provide study requirements, mitigation measures, preferred siting considerations, and a streamlined permitting process. As noted above for transmission, maintaining momentum and flexibility in infrastructure siting will be critical to meeting the County’s growing and evolving energy needs.

*CR-P8: Work with energy utilities to improve the safety and reliability of infrastructure replace with during extreme heat events.*

In 2025, PSE invested nearly $85 million in grid strengthening projects, with a large portion of this work concentrated in Kittitas County. This included equipment upgrades, underground conversions and tree wire installations. We have also installed 15 weather stations and seven Pano AI smoke-detecting cameras with viewsheds in the County, with an additional two planned for 2026. We share camera access with more than 270 emergency response agencies throughout our service territory, including fire districts, DNR and the Kittitas 911 center, which improve detection and response times. PSE will continue to invest in wildfire mitigation and vegetation management to reduce risk, protect our communities and maintain reliable electric service.

PSE has been a long-standing community partner, electric utility provider and renewable energy operator in Kittitas County. We are committed to supporting Kittitas County’s economic growth by investing in electric infrastructure that serves existing customers, attracts new business and supports housing and employment growth. We will also continue to work alongside Kittitas County to support renewable energy projects that contribute to the local tax base, landowner income, long-term capacity, and the clean energy economy.

PSE looks forward to continued collaboration with Kittitas County as the Comprehensive Plan is refined. Thank you for considering our comments and for your commitment to thoughtful, forward-looking utility planning.

Sincerely,

Carryn Vande Griend
Puget Sound Energy
Local Government Affairs

"Dear Kittitas County Planning Department,
As concerned residents of Washington State with an interest in sustainable rural development, we are submitting this public comment on the Easton Subarea Plan, particularly regarding the integration and application of Type 3 Limited Areas of More Intensive Rural Development (LAMIRDs) under the Growth Management Act (GMA). Our comments are informed by a detailed review of expert analysis on similar proposals in the area, such as the Sparks Park-Easton Travel Center variance (File VA-23-00003), which highlights critical inconsistencies with state and county planning standards. These issues underscore the need for stricter adherence to rural character protection in any subarea planning updates.
1.Scale and Intensity of Development: The subarea plan should explicitly limit new commercial developments to isolated small-scale businesses to preserve rural character. For instance, proposals exceeding Kittitas County Code (KCC) 17.15.070 limits, such as those over 30,000 square feet in area, 33% impervious surfaces, or 4,000 square feet of retail, risk creating urban-like sprawl along highway corridors. In the case of large-scale facilities like travel centers with extensive impervious surfaces (e.g., 69% coverage over 15+ acres), this violates Comprehensive Plan standards and discourages low-density rural sprawl as prohibited by the GMA. We urge the plan to incorporate binding size caps and intensity thresholds to ensure new uses remain compatible with surrounding rural lands.
2.Utilization of Pre-Existing Sites: LAMIRDs are intended as a one-time recognition of areas in existence prior to 1991, not for ongoing expansion onto vacant lands. The subarea plan must prohibit designations on sites without evidence of prior commercial occupancy, such as tree-covered parcels shown in historical aerial photos (e.g., 2009 Easton Study Area imagery). Allowing development on undeveloped sites contradicts RCW 36.70A.070(5)(d) and could lead to inappropriate conversion of rural lands. Recommendations include mandatory historical site reviews using GIS and aerial data to verify pre-1991 uses.
3.Conformance to Rural Character: The plan's definition of rural character, emphasizing open spaces, natural landscapes, vegetation predominance, traditional rural lifestyles, wildlife compatibility, and protection of groundwater, must be rigorously enforced. Developments that introduce 11-12 acres of impervious surfaces within Critical Aquifer Recharge Areas (CARAs) or near Group A Wellhead Protection Areas pose significant risks to groundwater resources, as seen in proposals covering 74% of sites with impervious materials. This conflicts with KCC 17A.03.020 and Best Available Science requirements. Additionally, incompatibility with adjacent resource lands (e.g., state-owned forests) and facilities like Easton State Airport could undermine outdoor recreation and aviation safety, per Comprehensive Plan policies T-P44 and RR-P2. The subarea plan should mandate critical areas reviews, mitigation sequencing (KCC 17A.01.100), and buffers (up to 200 feet from CARAs) for all proposals, while discouraging strip commercial developments.
In conclusion, updating the Easton Subarea Plan provides an opportunity to align with the GMA by evaluating intense proposals such as Comprehensive Plan amendments or rezones, rather than variances. Prioritizing small-scale, site-specific developments will protect Eastern Washington's rural economies, water resources, and visual landscapes. We recommend incorporating these safeguards to prevent future inconsistencies and support job opportunities for rural residents without compromising environmental values.
Thank you for considering this comment.

Warm Regards,

Friends of Easton, on behalf of its members: (including but not limited to)

Gina Peckman, gina@peckmansearch.com
Marge Brandsrud
John Jensen
Cc. Terry Danysh, PRK Livengood
James Carmody, MFT Law

**From:** sara@krdistrict.org
**To:** Jeremy Johnston
**Cc:** kevin@krdistrict.org
**Subject:** Kittitas County 2026 Comprehensive Plan Periodic Update - Comments
**Date:** Monday, March 2, 2026 4:07:28 PM



Kittitas Reclamation District would like to submit the following comments regarding the Kittitas County Comprehensive Plan Periodic update:

10.1 Climate Resiliency

*Yakima River Basin Integrated Water Resource Plan*

- Add in "YBIP" or "Yakima Basin Integrated Plan" into parenthesis after the name.
- This is a relatively vague description of the Yakima Basin Integrated Plan missing collaboration between federal, state, tribal, environmental entities, and other NGO partners. There is also a need to provide more details about the actions of this plan. Please coordinate with Arden Thomas/KCPW for a more detailed description.

10.4 Hazard Mitigation

Kittitas Reclamation District (KRD) should be identified as a planning partner within the Hazard Mitigation Plan at the next available opportunity.

Please let us know if there are any questions.

Thanks,

**Sara Vickers**
**KRD Assistant Manager - Operations**
**Lands Clerk/RRA Specialist**
**509-925-6158 - Office**
**509-929-5014 - Cell**
**www.kittitasreclamationdistrict.org**

Part Two:

7. USE THE RIGHT PROCESS FOR THE RIGHT PROPOSAL

The subarea plan should make clear that a variance is not the appropriate mechanism for approving development that exceeds Type 3 LAMIRD dimensional standards. A variance addresses minor deviations in cases of practical difficulty or unnecessary hardship. It is not a tool for authorizing development at a fundamentally different scale or intensity than what the zoning allows.

Recommended subarea plan language: "Any proposed development that exceeds the dimensional standards established in KCC 17.15.070 for rural General Commercial zoning shall not be processed as a variance. Proposals that would fundamentally alter the character, scale, or intensity of land use shall be evaluated as a Comprehensive Plan amendment and rezone, subject to full public participation, environmental review, and policy analysis as required by the Growth Management Act."

8. SUMMARY OF REQUESTED SUBAREA PLAN ADDITIONS

I respectfully request that the Easton Subarea Plan be updated to include the following provisions:

4.Restate the binding dimensional limits from KCC 17.15.070 (30,000 sq ft total area, 4,000 sq ft retail, 33% impervious surface) as hard caps that cannot be exceeded through variance.

5.Require documented proof of prior commercial occupancy through historical aerial photography and county records before any Type 3 LAMIRD development is approved.

6.Mandate verified critical areas review cross-referenced against County CARA maps and Group A Wellhead Protection Area maps for every development application.

7.Require mitigation sequencing and Best Available Science for all proposals within or within 200 feet of a Critical Aquifer Recharge Area.

8.Require compatibility review for proposals adjacent to DNR resource lands and the Easton State Airport, consistent with Comprehensive Plan Policies T-P44 and RR-P2.

9.Prohibit strip commercial development patterns along highway corridors, consistent with GMA and Comprehensive Plan policy.

10.Direct over-scale proposals to the Comprehensive Plan amendment and rezone process, not variance, to ensure adequate public participation and environmental review.

9. ADDITIONAL COMMENTS ON THE EASTON SUBAREA PLAN

In addition to the Type 3 LAMIRD development standards addressed above, I am submitting the following comments on other sections of the Easton Subarea Plan. These comments address gaps in the plan's treatment of housing, economic development, wastewater infrastructure, and wildfire mitigation, areas where the plan needs stronger, more actionable language to serve this community.

9.1 Housing: The Plan Must Be Specific About Affordable and Workforce Housing

The Housing section of the Subarea Plan (Section 3) acknowledges that Easton's population is aging, that renter-occupied units have declined by 55%, and that the community has expressed strong interest in affordable housing for young families and first-time buyers. However, the plan's goals and policies remain too general to produce results. The plan references "affordable housing options" and "property improvements" without defining what affordable means in the Easton context, without identifying specific housing types, and without committing to measurable targets.

The community's own comments are specific: they want starter homes, affordable single-family homes for first-time buyers, ADUs on R-5 lots, and protections against outside investment driving up prices. The plan should match that specificity. I recommend the following additions:

a. Define "affordable housing" in the plan using a standard benchmark: housing that costs no more than 30% of the area median household income. The plan should state this threshold explicitly so that future policy decisions can be measured against it.

b. Include workforce housing as a distinct category. Workforce housing serves the people who work in the community, teachers, fire district staff, service workers, school employees but cannot afford to live here. The plan should explicitly commit to creating housing options for households earning between 60% and 120% of area median income.

c. Set a measurable housing target. Based on the plan's own data showing 408 residents and an aging population, the community should set a goal of 20–40 new affordable and workforce housing units within ten years within the Type 1 LAMIRD, tied to wastewater infrastructure capacity (see Section 9.3 below).

d. Add short-term rental protections. Community members specifically raised concerns about outside investors driving up prices and short-term rentals overtaking housing stock. The plan should include policy language directing the county to regulate or limit short-term rentals within the LAMIRD to protect the community's housing supply for full-time residents.

e. Identify specific grant programs for affordable housing development in the recommended actions, including the Washington Housing Trust Fund, USDA Multi-Family Housing Direct Loans (up to $50M for rural communities under 35,000 population), and HUD Community Development Block Grants through Washington Commerce.

9.2 Economic Development: The Plan Needs a Market Analysis and Actionable Strategy

The Economic Development section (Section 4) identifies community desire for revitalization of Railroad Street and small local businesses. It proposes walking tours, vision boards, and consulting with railroad operators as recommended actions. While community engagement is valuable, these actions alone will not generate jobs, attract businesses, or close the service gaps residents have identified. Walking tours and vision boards are process steps, not economic development outcomes.

The plan contains no market analysis. There is no assessment of what types of businesses are financially viable in a community of 408 residents with seasonal recreational traffic. There is no estimate of consumer demand, visitor spending capture, or revenue potential for the types of businesses residents want (coffee shops, restaurants, gear rental, small retail). Without this analysis, the plan is asking the community to pursue economic development without knowing what the market will support.

I recommend the following additions to the Economic Development section:

**CONTINUED FROM PAGE 2**

a. Commission or include a basic market analysis as a recommended action within the first year. This does not need to be expensive, EDA Planning and Technical Assistance Grants (up to $300K) or USDA Rural Business Development Grants (up to $500K) can fund feasibility studies for rural commercial development. The analysis should assess: what types of businesses are viable given year-round and seasonal population, what the I-90 traffic volume (30,000+ vehicles per day) means in terms of capture potential, and what infrastructure prerequisites must be met before businesses can operate.
b. Tie the economic development goals directly to the wastewater infrastructure constraint. The plan acknowledges that the lack of a sewer or septic system is the primary barrier to development and school expansion (Section 5.3). No amount of vision-boarding will produce a coffee shop or restaurant on Railroad Street if there is no wastewater system to support it. The economic development section should state plainly that securing wastewater infrastructure funding is a prerequisite to Railroad Street revitalization, not a parallel effort.
c. Include job creation targets. The plan should set a measurable goal, even a modest one such as 15–25 new permanent jobs within five years from small businesses, cottage industries, and recreation-related services within the LAMIRDs.
d. Replace or supplement the walking tour and vision board actions with concrete steps: apply for an EDA Planning Grant for a Railroad Street market feasibility study within the first year; identify three to five specific business types the market will support and actively recruit them; and coordinate with the Kittitas County Economic Development Committee to integrate Easton into the county-wide economic development strategy currently being developed.
9.3 Wastewater Infrastructure: The Single Most Critical Prerequisite
The Subarea Plan identifies the lack of a septic or sewer system as the primary barrier to development and school expansion. Community members have raised this repeatedly in the March 2025 open house, in the April 2025 community meeting, and in ongoing discussions. It was the very first comment at the open house: “Need a large scale septic system to move Easton forward.” And yet the plan does not include a single recommended action, timeline, or funding strategy for securing wastewater infrastructure.
This is the linchpin. Without wastewater infrastructure, Railroad Street revitalization cannot happen. New businesses cannot operate. Housing expansion is constrained. The school cannot expand. The plan needs to state this clearly and include a concrete path forward. I recommend the following:
a. Add a new goal: “EG 5.1: Secure funding for a community wastewater system to serve the Type 1 LAMIRD, enabling economic development, housing expansion, and school facility improvements.”
b. Include specific federal and state funding programs in the recommended actions: USDA Rural Utilities Water and Waste Disposal Grants and Loans (up to $5M per project for rural communities); EPA Clean Water State Revolving Fund through Washington Ecology; Washington Department of Commerce CERB infrastructure loans ($5M maximum at 1% interest); and USDA Rural Economic Development Loans and Grants through local utilities.
c. Add a Year 2 implementation action: commission a wastewater feasibility study to assess system options (community septic, small-scale treatment, or decentralized cluster systems), estimated costs, and the most competitive federal or state funding programs. This study is a prerequisite to any grant application and should be prioritized alongside the communication networks and inventory milestones already in the implementation timeline.
d. Add wastewater infrastructure as a milestone in the implementation timeline (Section 7.6), targeting feasibility study completion by Year 2 and grant application submission by Year 3.
e. Change language where “restrooms” are mentioned to “tourism support services”
9.4 Wildfire Mitigation: The Plan Should Pursue Firewise Designation and Federal Funding
Section 6 of the Subarea Plan correctly identifies wildfire as a serious threat to the Easton community, noting that the USDA classifies risk to homes in Kittitas County as greater than 97% of counties in Washington. The plan includes a policy to “Create a Firewise Community Plan” (EP 6.1) and recommends seeking funding for fire mitigation. However, the recommended actions are limited to quarterly consultations, hosting an awareness day, and seeking general funding opportunities. These are awareness activities, not a funded mitigation strategy.
Kittitas County already has a strong foundation through KFACC (Kittitas Forest and Fire Adapted Communities Coalition), which has secured $10 million in federal funding for forest thinning and has established 18 recognized Firewise Communities in the county. Easton should build on this existing infrastructure rather than starting from scratch. I recommend the following additions:

3/1/2026

SUBMITTED VIA ONLINE COMMENT FORM
AVAILABLE ON THE PROJECT WEBSITE
(KittitasCounty2026.com)

**Comment #005**

**CONTINUED FROM PAGE 3**

a. Set an explicit goal of achieving Firewise USA community recognition for the Easton area within two years. This is a structured national program administered by the National Fire Protection Association that provides a framework for community-level wildfire preparedness, and recognized communities may qualify for insurance premium reductions of 10–20%, a direct financial benefit to every homeowner in the area.
b. Include specific federal grant programs in the recommended actions: USDA Community Wildfire Defense Grants ($250K–$10M for fuels reduction planning and treatment, annual cycle typically in spring); FEMA Fire Prevention and Safety Grants (up to $200K for Firewise community programs); FEMA Building Resilient Infrastructure and Communities (BRIC) grants for hazard mitigation projects; and Washington DNR Forest Health Grants for fuels reduction and forest restoration.
c. Add a Year 1 implementation action: coordinate with KFACC and Fire District 3 to conduct a Wildland-Urban Interface assessment specific to the Easton subarea, map defensible space needs for properties within and adjacent to the LAMIRDs, and submit a USDA Community Wildfire Defense Grant application by the next annual cycle.
d. Add wildfire mitigation funding as a milestone in the implementation timeline (Section 7.6), targeting Firewise recognition by Year 2 and a federal fuels-reduction grant application by Year 1.
The laws already exist. The limits are already on the books. The Easton Subarea Plan is our opportunity to make sure they are applied clearly and consistently so that the rural character of this community is protected for the long term. But protection alone is not enough. This plan must also give Easton’s residents the tools they need to build a sustainable future, affordable housing they can actually live in, businesses that can actually operate, wastewater infrastructure that unlocks both, and wildfire protections funded by the federal and state programs that exist for exact.

Gina Peckman
Gina@peckmansearch.com

3/1/2026

SUBMITTED VIA ONLINE COMMENT FORM AVAILABLE ON THE PROJECT WEBSITE (KittitasCounty2026.com)

**Comment #005**

PUBLIC COMMENT ON THE EASTON SUBAREA PLAN
What the Law Allows and Prohibits on Type 3 LAMIRD Land
To: Kittitas County Planning Department, Community Development Services and consultants,
As you update the Easton Subarea Plan, I am submitting this comment to request that the plan include clear, enforceable language defining what can and cannot be built on Type 3 LAMIRD land. The Growth Management Act, Kittitas County's Comprehensive Plan, and the County Code already set these standards. They just need to be stated plainly in the subarea plan so there is no ambiguity going forward.
This comment draws on the legal framework established by RCW 36.70A.070(5), RCW 36.70A.030(35), Kittitas County Code Chapter 17.15, the Critical Areas Ordinance (KCC Title 17A), the Kittitas County Comprehensive Plan, and relevant Growth Management Hearings Board decisions.
1. WHAT STATE LAW SAYS ABOUT TYPE 3 LAMIRDs
The Growth Management Act created Type 3 LAMIRDs under RCW 36.70A.070(5) as a narrow exception to general rural land use restrictions. The Legislature authorized counties to allow limited new commercial development in rural areas, but only when all three of the following conditions are met:
1.Isolated small-scale business. The development must be an isolated, small-scale business. This is not aspirational language—it is a ceiling on what can be built.
2.Site previously occupied by an existing business. Under RCW 36.70A.070(5)(d), the new development must utilize a site that was previously occupied by a business. LAMIRD designations are tied to areas or uses in existence prior to 1991. This is a threshold eligibility requirement, not a preference.
3.Conforms to rural character. The new business must conform to the rural character of the area as defined by the county government.
A proposal that fails any one of them is ineligible for Type 3 LAMIRD development. The Growth Management Hearings Board confirmed in People for a Liveable Community v. Jefferson County (No. 03-2-0009c, 2003) that LAMIRDs are "intended to be a one-time recognition of existing areas and uses and are not intended to be used continuously to meet needs (real or perceived) for additional commercial and industrial lands."
2. THE HARD LIMITS: WHAT KITTITAS COUNTY CODE ALLOWS
Kittitas County implemented the GMA's Type 3 LAMIRD standards through KCC 17.15.070, which governs the rural General Commercial zoning district. These are the binding dimensional and intensity limits for any development on Type 3 LAMIRD land:
These limits exist to implement the GMA's "isolated small-scale business" standard. They are not starting points for negotiation. They are the maximum development intensity the Legislature intended for rural commercial land. Any proposal that exceeds these thresholds is, by definition, not a small-scale business and cannot be approved under Type 3 LAMIRD authority.
3. SITE ELIGIBILITY: THE PRE-EXISTING BUSINESS REQUIREMENT
Not every parcel within a Type 3 LAMIRD boundary is automatically eligible for new commercial development. RCW 36.70A.070(5)(d) requires that the site be one "previously occupied by an existing business." This means:
Recommended subarea plan language: "No new commercial development shall be approved on Type 3 LAMIRD land unless the applicant demonstrates, through documented evidence including historical aerial photography and county records, that the specific parcel was previously occupied by a commercial business. Vacant or undeveloped land within a LAMIRD boundary does not satisfy this requirement."
4. RURAL CHARACTER CONFORMANCE: WHAT THE STANDARD REQUIRES
Even when a proposal meets the size limits and site eligibility test, it must also conform to rural character. RCW 36.70A.030(35) defines rural character through seven criteria. Kittitas County has adopted its own local definition: rural character is "the predominant visual landscape of open spaces, mountains, forests, and farms and the activities which preserve such features."
Any new development on Type 3 LAMIRD land must satisfy all of the following:
•Open space and natural landscape predominate over the built environment (RCW 36.70A.030(35)(a))
•Traditional rural lifestyles and rural-based economies are fostered, not displaced (RCW 36.70A.030(35)(b))
•Visual landscapes traditionally found in rural areas are maintained (RCW 36.70A.030(35)(c))
•Compatibility with wildlife and fish habitat (RCW 36.70A.030(35)(d))
•No inappropriate conversion of undeveloped land into sprawling, low-density development (RCW 36.70A.030(35)(e))
•No requirement for extension of urban governmental services (RCW 36.70A.030(35)(f))
•Protection of natural surface water flows and groundwater recharge/discharge areas (RCW 36.70A.030(35)(g))
Additionally, Comprehensive Plan Policies T-P44 and RR-P2 discourage uses incompatible with resource lands and airports. The Easton area includes working forest land managed by the Washington State Department of NaturalThe subarea plan should explicitly require compatibility review for any proposal adjacent to resource lands or airport operations.
The GMA and Comprehensive Plan also prohibit strip commercial development along highway corridors. The subarea plan should include language preventing the clustering of commercial uses that would create a pattern of highway-oriented commercial sprawl.

**CONTINUED FROM PAGE 5**

**Comment #005**

5. CRITICAL AREAS PROTECTION: NON-NEGOTIABLE REQUIREMENTS
Much of the Easton LAMIRD area sits within or adjacent to designated Critical Aquifer Recharge Areas (CARAs). The Easton Water District depends entirely on groundwater for its domestic and drinking water supply. The subarea plan must incorporate the following existing legal requirements and make them explicit in the development review process:
Recommended subarea plan language: "No development application within a Type 3 LAMIRD shall be approved without a verified critical areas review that cross-references the County's Critical Area CARA maps and Group A Wellhead Protection Area maps. A finding of 'no critical areas' is insufficient without documented evidence that the County's own CARA maps, wellhead protection area designations, and Critical Areas Ordinance requirements have been reviewed and addressed. All proposals within or within 200 feet of a CARA shall comply with mitigation sequencing under KCC 17A.01.100 and use Best Available Science to protect groundwater resources."
6. CLEAR STATEMENT: WHAT YOU CAN AND CANNOT BUILD
Based on the full legal framework above, here is a plain-language summary of what is and is not permissible on Type 3 LAMIRD land in the Easton area. I request that the subarea plan incorporate this distinction explicitly:
WHAT YOU CAN BUILD
•A small-scale commercial business that fits within 30,000 square feet of total use area
•Retail uses that do not exceed 4,000 square feet
•Development that keeps impervious surface at or below 33% of the lot
•New business on a site with documented prior commercial occupancy
•Uses that preserve the visual landscape of open spaces, forests, and farms
•Uses compatible with adjacent resource lands, airports, local resort business, and outdoor recreation
•Development that protects groundwater recharge areas and meets Best Available Science standards
•Businesses that provide job opportunities for rural residents without requiring urban services
WHAT YOU CANNOT BUILD
•Any development exceeding 30,000 square feet of total use area
•Any retail component exceeding 4,000 square feet
•Any project with impervious surface coverage exceeding 33% of the lot
•New commercial development on vacant or undeveloped land with no documented prior business use
•Large-scale highway-oriented commercial facilities (travel centers, large fuel stations, multi-use commercial complexes)
•Development that converts open space, forest, or natural landscape into predominantly built environment
•Uses that create strip commercial patterns along highway corridors, especially near other LAMIRD commercial uses
•Uses incompatible with adjacent working forest land, airport operations, or outdoor recreation values
•Any development within a Critical Aquifer Recharge Area that has not undergone a verified CARA review, mitigation sequencing, and Best Available Science analysis
•24/7 commercial operations that generate noise, light pollution, and heavy vehicle traffic incompatible with rural character

Gina Peckman
gina@peckmansearch.com

SUBMITTED VIA ONLINE COMMENT FORM AVAILABLE ON THE PROJECT WEBSITE (KittitasCounty2026.com) 3/1/2026

**Comment #006**

Please see correction in spelling of platted and dedication date entered in this paragraph. (pg6)

Permanent Settlers and Fires created growth and eventually decline in businesses. The first post office opened on June 23, 1890, and in 1902, the Johnson Brothers plated the town and on August 29, 1902, Easton was dedicated. By 1904, about 150 people lived in Easton. On Thanksgiving Day, 1906, a fire destroyed part of south Easton, including 11 saloons which were quickly rebuilt. Another fire hit south Easton in 1913, destroying the rebuilt saloons. The third major fire occurred in the business district in 1934. In 1941, the Easton Volunteer Fire Department was established and still provides valuable services to the community today.

Somewhere in this document it still has PUD for our power source, it should be PSE

Debbie Bogart
dabogart@outlook.com

**Comment #007**

Gmail

**Kittitas County 2026 Comments <comments@kittitascounty2026.com>**

# Easton Sub Area Comments

1 message

**Marge Brandsrud** <dmbrandsrud@comcast.net> Sun, Mar 1, 2026 at 3:08 PM
To: "comments@kittitascounty2026.com" <comments@kittitascounty2026.com>

Please see attached PDF document.  This may be a duplicate as the initial email was sent from a different email address.

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**March 1 2026 comments.pdf**
137K

 **Duplicate of Comment #007**

Gmail **Kittitas County 2026 Comments <comments@kittitascounty2026.com>**

# Easton Sub Area proposal Comments

1 message

**DAVE BRANDSRUD** <davebrandsrud@gmail.com> Sun, Mar 1, 2026 at 2:59 PM
To: comments@kittitascounty2026.com

Please see attached PDF document

**March 1 2026 comments.pdf**
137K

Comment #007

March 1, 2026

Kittitas County Community Development Services
411 N Ruby ST, Suite 2
Ellensburg WA 98926

Re: Public Comment on the proposed Easton Sub Area Plan

I would like to thank Community Development Services for their assistance in forming this proposed addition to the County's Comprehensive Plan.

After reviewing the Draft version of the Easton Sub Area Plan I offer the following comments.

**Page 16 of the Draft includes Easton Table 1 Zoning Descriptions and Uses.** The information presented on the table is blatantly misleading. Descriptions and allowed used presented do not include Rural LAMIRD allowed use information provided in Kittitas County Code 17.15.070 Allowed Uses in Rural LAMIRD Lands and 17.15.071 Rural LAMIRD Table. The Descriptions and Allowed uses appear to be taking from County Code Definitions and do not reflect actual allowed uses and descriptions in the two LAMIRDS included in the Sub Area boundary. The LAMIRDS are the areas where Light Industrial and General Commercial development would be allowed. Kittitas County Code 17.15.070 and 17.15.071 include language which was put in place to comply with the GMA's LAMIRD designation. If a Zoning Description Table is included in the Sup Area Plan it must represent actual allowed uses and restrictions for the LAMIRDS.

**2.4 Goals and Policies**

**EG 1.0**

**EP 1.0** **Work with Property owners and the community to** develop a revitalization plan infrastructural which will support economic and residential growth.

**EP 1.1 "delete "such as requiring conditional use permits."** Conditional Use review ensures that a proposed use not usually permitted aligns with community standards and zoning. Impacts to the community, neighbors and the environment must be evaluated and mitigations applied when applicable.

**EP1.5** **ADD whole retaining Rural Character**

**Recommended Actions**

**EA1.1** **Add language that will include property owners to this process.**

**Page 22 Easton Table 4 Housing Inventory**

I am having difficulty understanding what this Table represents. It obviously does not represent on the ground inventory and is not reasonable to assume these are projected additional units.

**Page 29 Recommended Actions**

**EA 4.0 A Vision Board should include property and business owners working with the community to create a cooperative and creative vision that can move forward to a reality.**

**Page 30 5.2 Existing Conditions**

**There are no public wastewater systems serving the proposed Easton Sub Area. All wastewater is processed by private septic systems.**

**Electricity in the proposed Easton Sub Area is provided by Puget Sound Energy.**

**I-90 divides the area – there are safety concerns, emergency access issues and traffic pressures. These issues are well documented and are an on-going issue with local citizens and businesses. There is a real threat to the Life Safety and Welfare on the community. The proposed Easton Sub Area is Rural and is greatly impacted during travel interruption impacts on I 90 allowing what would be considered urban levels of traffic to leave the Interstate and block Easton Area roadways. Those blocking incidents greatly impact the local emergency services and their ability to assure the life safety and welfare of the community as well as the traveling public.**

Final thoughts
I am encouraged by the community input and participation in this process. I believe moving forward the Sub Area Plan will bring the community closer together and revitalize the community as a whole. I am encouraged that the community is deeply interested in and committed to maintaining the Rural Caracter while future development and infill.

Thank you for reviewing my comments. I will be providing additional comments as this process moves forward

Marge Brandsrud Comment #007
PO Box 638
Easton WA 98925
dmbrandsrud@comcast.net

Comment #008

| | |
|---|---|
| **From:** | Jill Merwin |
| **To:** | Jeremy Johnston |
| **Subject:** | Easton Subarea Plan Edits and Comments V3.0 |
| **Date:** | Friday, February 27, 2026 2:21:31 PM |



Hi Jeremy,

Below are my edits/comments for the Easton Subarea Plan. Please feel free to reach out if you have any questions or concerns.

Thank you for taking the time to read these, and for all the assistance you have provided to the Easton community. Your attention and knowledge are greatly appreciated!

## Subarea Plan V3.0 Edits and Comments

Note: The footnotes indicate that Engagement was collected between March 2025 to June 2026. Is the 2026 date correct, or should it be 2025?

Page 4; 1.2  Last paragraph; description of the area. "…forested hills and steep slopes to the south and west as the train rises into the Cascade foothills." Should this description include the rises to the north and east? (Easton Ridge)

Page 8. Easton Figure 8 description. Keechelus dam is misspelled as Keechlus.

Page 11; 1.4. Second line. Board of county commissioners is misspelled as BOAD.

Page 11; 1.5. First paragraph regarding the Easton community collaboration on revisions to the plan between March 2025 to June 2026. Is the June 2026 date valid?

Page 18; 2.3. Community landmarks. Should Silver Ridge Ranch be included? It's been in existence for I believe over 50 years and has been a prominent feature of the community. It sits right behind the LAMIRD 3 property off of Sparks Rd.

Page 18; 2.3.1. Community Design and Aesthetic. Should "Aesthetic" in the 2.3.1 title be plural, as in "Aesthetics"?

Page 19; 2.4.  EP 1–1 "…reduce barriers to permitting, such as requiring conditional use permits." Remove "…such as requiring conditional use permits." This does not serve the community in a positive way.

Page 30; 5.2. Existing Conditions. Second paragraph states those not served by the Easton Water District are served by private wells and septic tanks for their water and waste water. This is true, however, properties that are served by the Easton Water District also utilize septic tanks for wastewater. There is no municipal sewer in Easton.

Page 30; 5.3. Summary of Community Input - "Feedback from the community" lacks a footnote like the other summaries include on previous pages.

Page 32; 6.2. Existing Conditions, second paragraph, first sentence describes forested slopes, particularly to the south and west. But there are also slopes to the north and east. Should those also be included?

**Comment #008**

Page 34; 6.3. Summary of Community Input - “Feedback from the community” lacks a footnote like the other summaries include on previous pages.

Page 37; 7.4. Summary of Community Input - “Feedback from the community” lacks a footnote like the other summaries include on previous pages.

Page 37; 7.5. Implementation Actions, first paragraph, second sentence, “The community can also…” is unfinished.

Page 37; 7.5, Implementation Actions, second paragraph, “As the community moves forward, as implementation actions are executed the community…” Should this state “As the community moves forward, “and” (instead of “as”) implementation actions are executed…”?

Thank you.

Jill Merwin
Easton Resident
541-602-2652
jamerwin@gmail.com

State of Washington
DEPARTMENT OF FISH AND WILDLIFE
South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720
Telephone: (509) 575-2740 • Fax: (509) 575-2474

February 24, 2026

Jeremy Johnston
Long Range Planner
Kittitas County Community Development Services
411 N. Ruby Street, Suite 1
Ellensburg, WA 98926

SUBJECT: WDFW comments on Kittitas County draft 2026 Comprehensive Plan

Dear Mr. Johnston,

Thank you for the opportunity to review the Kittitas County draft Comprehensive Plan. The Washington Department of Fish and Wildlife (WDFW) has reviewed the plan, and we appreciate that many positive aspects have been included in the plan, including elements and mentions to include wildlife connectivity and the recognition that having connected fish and wildlife habitats leads to a more resilient landscape. We provide these comments to improve the plan in accordance with WDFW's mission to preserve, protect and perpetuate the state's fish, wildlife and ecosystems.

*Section 2. Land Use.*
2.3.8. LU-G9. Master Planned Resort (MPR). Open space in the MPR should prioritize protection of critical areas. Past MPRs have been permitted in wildlife connectivity corridors and next to streams and wetlands. Please include a policy that recreation will be minimized in the critical areas and limited to low-impact recreation such as trails.

Table 2-1 indicates that about 217,000 acres of land are within the Forest and Range zoning designation (~15% of land in the county). The base density is 1du/20ac. Based on the spatial distribution of the zone, this is where some level of development could occur that could fragment high quality habitat areas and habitat connectivity. Recommend either modifying RR-P10 to include wildlife connectivity or add a separate policy that discourages rezones that increase rural densities in these areas of conflict with wildlife connectivity.

Table 2-2, on page 25, about half of the 2046 population growth (7,280 people) is allocated to Unincorporated Kittitas County. This will increase low-density sprawl within the county. This also contradicts LU-P3: Reduce the conversion of land for development and concentrate future growth in UGAs.

Table 4-1 (within the Housing section) shows that the population growth in unincorporated Kittitas County grew by 4,798 people from 2000 to 2020. The population of unincorporated Kittitas has surpassed the population(s) of all the incorporated areas within the county. Many

Fish and Wildlife Habitat Conservation Areas (FWHCAs) including wildlife connectivity corridors and shrubsteppe habitat are in these areas. We recommend directing growth towards the Urban Growth Areas (UGAs) and reducing population growth in unincorporated areas of the county. Continued sprawl is likely to undermine the value of these lands to various wildlife species. The county should consider additional policies to limit population growth in unincorporated and rural areas. The county should take additional measures to meet GMA planning goal 2 that directs plans to reduce sprawl by reducing the inappropriate conversion of undeveloped lands and encouraged growth in urban or incorporated areas.

2.3.10. Natural Environment
NE-G5, P26. WDFW Priority Habitat and Species (PHS) should be added to this list. Also recommend changing the word “evaluate” to “promote”.

*Section 3. Rural and Resource Lands.*
3.3.7 Rural Recreation. RR-G12. While WDFW understands and appreciates the need for balanced recreation, high-impact recreational development should be discouraged in areas of overlap with mapped corridors of wildlife connectivity. Please add this under RR-G12.

Commercial Agriculture Land Incentives. RR-G19-P103. These naturally occurring ponds and springs have high wildlife use and are often critically important in areas of limited water such as the dry areas zoned for commercial agriculture. Please clarify that these stock water uses will not preclude or diminish access by wildlife at these naturally occurring sites.

*Section 5. Transportation*
T-G1, P9. WDFW has its climate resiliency guidance on culverts. Suggest integration into this element: https://wdfw.wa.gov/species-habitats/habitat-recovery/fish-passage/climate-change to consider the impacts of climate hazards.

T-G6, P23. Wildlife. Consider tweaking the existing goal to add enhance wildlife connectivity (right now only says minimize impacts). Under P23, add existing roadways (right now it just says new roadways), but when we retrofit or rebuild roads, we should also look at connectivity options.

*Section 7. Utilities.*
U-G7, P21. WDFW recently completed its guidance on solar and wind, including where we recommend avoidance and mitigation strategies, BMPs and studies. We recommend that the WDFW guidelines are required for environmental review of any new wind and solar. https://wdfw.wa.gov/publications/02662

*Section 9. Parks and Recreation*
RPO-G1, P4. We appreciate the inclusion of these significant corridors. We would like to discuss ways that we can incorporate wildlife connectivity corridors identified in WAHCAP and designate those into open space plans. https://wdfw.wa.gov/species-habitats/habitat-recovery/connectivity/action-plan

Comment #009

I didn't see it in the existing or proposed Goals and Policies, but we should consider adding a Policy that designates open space areas that are within critical areas as a higher protection standard, potentially natural open space. There are only a few recreational elements that are consistent with critical areas protection, yet there are quite a few elements allowed in open space that are usually not compatible with critical areas. Designating these areas as a higher protection open space would likely reduce some of that conflict.

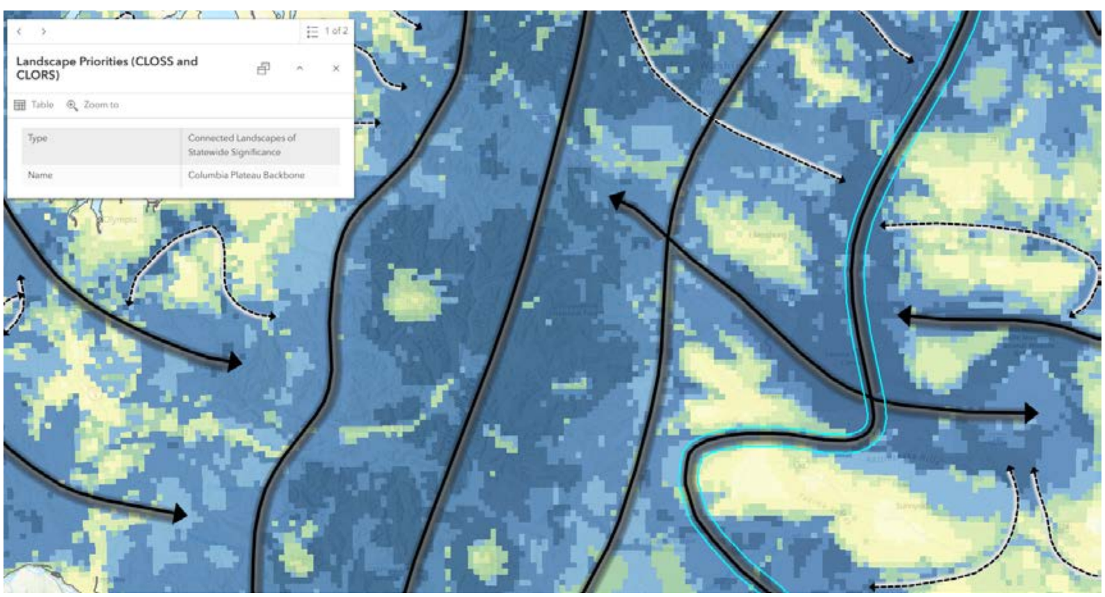
*<u>Section 10. Climate.</u>*

While we appreciate the elements of the climate section, it is primarily geared towards human uses. The County should include policies that "Identify, protect, and enhance natural areas to foster resiliency to climate impacts, as well as areas of vital habitat for safe passage and species migration". They should either include those policies within the climate element or show which policies in the other elements meet this requirement.

10.7.1. Drought. Additions:
Encourage water conservation to protect instream flows for fish and aquatic ecosystems.
Preserve wildlife migration corridors so that wildlife can adapt to drought and resiliency.

10.7.5. Wildfire. Modify CR-G5, P16 to address limiting new development in areas with high wildfire risk.

10.1.2. Statewide and Regional Consistency
Washington Habitat Connectivity Action Plan (WAHCAP)
We appreciate that reference to the plan is included and we believe this demonstrates a commitment to working to incorporate wildlife habitat connectivity into the county's document. While corridors were correctly identified in the Cascade region and connecting the Cascades to Hanford, there is a corridor of Statewide Significance that runs north to south in the eastern section of the county referred to as the Columbia Plateau Backbone, see attached screenshot below. Please amend the paragraph to include this corridor.



Washington Shrubsteppe Restoration and Resiliency Initiative (WSRRI)
In 2024, WA developed WSSRI-the Washington Shrubsteppe Resiliency and Restoration Initiative. One of the habitat protection goals states to work with local planning departments to encourage the inclusion of habitat protection and restoration into land-use plans. While shrubsteppe is already considered a critical area under PHS, WDFW would like to explore additional conservation measures for areas that WSRRI has designated as high priority conservation areas. We recommend that the plan be included in this section. Another habitat protection goal under WSRRI is to protect high quality shrubsteppe areas from high intensity fire. We recommend that WSRRI be mentioned in the hazard management plan under rangeland fire protection. https://wdfw.wa.gov/publications/02489

*Appendix B. Snoqualmie Pass Subarea Plan*
This subarea contains a statewide wildlife connectivity core of significance as identified in WAHCAP (named Cascade Crest) and the I-90 Snoqualmie Pass East (the largest wildlife crossing project to date in Washington) project runs through the plan area. Please update the natural feature sections within the plan to acknowledge these wildlife connectivity areas of significance.

The document refers to Plum Creek lands in several places. These lands were purchased by The Nature Conservancy. Please update the text to reflect current ownership.

Section 6.1.3 Item 14 discusses future improvements to I-90. The Snoqualmie Pass East project is completed for the first 7.5 miles and through the subarea plan area. Please update the document to reflect this.

*Appendix D. Easton Subarea Plan*
Wildlife Connectivity:

1. WAHCAP maps both I-90 Easton segment and the surrounding natural resource lands as having high wildlife habitat connectivity value. The sub-area plan should recognize that. Recommend including this acknowledgment under the Land Use setting.
2. Recommend including under the Goals and Policies for Transportation a statement that wildlife connectivity is a supported goal for highway projects.
3. Recommend including under the Goals and Policies for Land Use a statement that zoned areas in the forest and range and Rural 5 zoned lands are valued for wildlife connectivity and more intensive development in these lands should be discouraged.

While floodplain along the Yakima River is acknowledged as one of two primary natural hazards, there are no goals and policies in Section 6.4 that address ways to lessen the flood risk and preserve the natural floodplain of the Yakima River. Further development in the floodplain, particularly the areas of frequent flooding near the Yakima River, prevents river restoration in this reach. Development often requires loss of riparian habitat and hardening of the riverbanks to prevent natural river processes. We recommend, including under the Goals and Policies, Section 6.4, that solutions to parcels in these frequently flooded areas should be explored, including working with the Kittitas Flood Control Zone District. These solutions should be beneficial to natural river processes and to make the Yakima River more resilient.

*Appendix F. Land Capacity Analysis.*
While we appreciate that critical areas were mapped and the resulting area was removed from the analysis, it is uncertain if all Fish and Wildlife Habitat Conservation Areas (FWHCA) were included. In addition to streams and their associated Riparian Management Zones (RMZ) that are shown on the maps, additional FWHCA should be mapped including all WDFW Priority Habitat and Species mapping including shrubsteppe and Biodiversity Areas and Corridors. These are not currently included in Kittitas County Compas mapping, and we would like to clarify if they were included in this analysis. Further, the two maps included in the appendix only show areas around the existing jurisdictions of Roslyn, Cle Elum South Cle Elum, Ellensburg and Kittitas. We recommend including a map that shows the analysis at the county scale to be able to review and comment on unincorporated county areas.

Thank you again for the opportunity to comment. Please contact me at 509-607-3578 or Scott.Downes@dfw.wa.gov to set up a time to discuss these comments.

Sincerely,

Scott Downes
Regional Land Use Lead

**Comment #010**

| | |
|---|---|
| **From:** | Chad Bala |
| **To:** | Jeremy Johnston |
| **Subject:** | FW: Public comment on comprehensive plan |
| **Date:** | Thursday, February 19, 2026 11:39:24 AM |

From Pat Kelleher


***Chad Bala***
***Director***
***Kittitas County Community Development Services***
*411 N Ruby Street, Suite 2*
*Ellensburg, WA 98926*
*(P) 509-962-7506*
*chad.bala@co.kittitas.wa.us*


**From:** pat kelleher <psk98926@yahoo.com>
**Sent:** Thursday, February 19, 2026 10:19 AM
**To:** Chad Bala <chad.bala@co.kittitas.wa.us>
**Subject:** Public comment on comprehensive plan



Chad

Please include my comments for the record on comprehensive plan

https://www.co.kittitas.wa.us/uploads/documents/bocc/boards/conference-of-governments/ADOPTED%202016%200705%20Kittitas%20Co%20CWPPS%20per%20Ord%202016-013.pdf

Regards

Pat Kelleher

Comment #010

## Kittitas County

# Countywide Planning Policies

## Last amended on July 5, 2016

## Ordinance Number 2016 - 013

## PREAMBLE TO THE COUNTY-WIDE PLANNING POLICIES

These Planning Policies are to be used solely to establish a framework from which the comprehensive plans of the County and cities within the county are developed and adopted, pursuant to RCW 36.70A, The Growth Management Act.

These policies are adopted to ensure consistency and coordination among the comprehensive plans of the County and the cities.

Nothing in these policies shall be construed to alter the land use powers of the cities or County.

## VISION STATEMENT

This statement is a general vision of the future of our county, toward which this framework and these policies aim.

Kittitas County and the cities will value and protect and enhance the quality of life by protecting the visual and physical environment; fostering economic opportunity, diversity, and security; supporting a wide range of natural resource-based industries; ensuring access to recreational opportunities; promoting educational excellence; and providing for affordable housing and accessible transportation.

Discussion and Explanation

Planning for growth and change must be based on maintaining and enhancing the existing quality of life, the character of the County, and meeting the needs of the community as a whole.

Actualizing this vision requires a collaborative effort among public officials from all jurisdictions and active citizen participation. Public officials have decision making responsibility; however active citizen involvement through a variety of venues must be encouraged and valued.

The entire community must be willing to share the burden and the responsibility of achieving mutually identified planning goals.

The implementation of County-wide Planning Policies will promote more efficient growth patterns which may result in reduced cost of public services and facilities in the long term due to more logical distribution of governmental services.

## ROLE OF THE KITTITAS COUNTY CONFERENCE OF GOVERNMENTS

i. The Kittitas County Conference of Governments (KCCOG) may serve as mediator in matters of conflict resolution regarding interpretations and issues of clarification related to this document.

ii. All jurisdictions of Kittitas County will jointly work to identify and address service areas and their impacts through the KCCOG.

iii. The process for engaging in conflict resolution mediation with regard to development impact fees shall be agreed upon by all parties involved, KCCOG shall serve as the first level of conflict resolution according to the agreed upon process.

## 1. INTERLOCAL AGREEMENTS

Objective: To encourage cooperation between Kittitas County and the cities and towns within the County on a basis of mutual advantage and to provide services and facilities in a manner that will be best suited to geographic, economic, population, and other factors that influence the needs and development of local communities.

Policy 1.1: Measures intended to implement countywide planning policies may include interlocal agreements, contracts, memorandums of understanding, and joint ordinances, or a combination thereof.

Policy 1.2: Cities and the County shall execute interlocal agreements to coordinate and manage growth in UGAs and should consult special districts as appropriate. Interlocal agreements shall acknowledge and implement the Countywide Planning Policies and shall incorporate uniform criteria for orderly annexation.

Policy 1.3: Joint funding arrangements through mechanisms such as interlocal agreements should be adopted for a period after annexations of developed properties to consider compensation for the County's loss of revenues and its capital facility expenditures prior to annexation, and any city obligations to provide capital facilities to the area annexed.

## 2. URBAN GROWTH AREAS

Objective: To cooperatively determine future Urban Growth Areas and provide opportunities for a broad range of needs and uses within such areas for the following twenty (20) years for each jurisdiction.

General Policies

Policy 2.1: The County, in cooperation with the cities, will designate Urban Growth Areas (UGAs) for each jurisdiction that is expected for the next twenty (20) years as required by the Growth Management Act. Policies may consider potential growth anticipated for the subsequent fifty (50) years.

Policy2.2: The designation of UGAs beyond the existing limits of incorporation will be based on demonstration of necessity to meet population projections and a demonstration by the cities that municipal utilities and public services either already exist, or are planned for and can be effectively and economically provided by either public or private sources.

Policy 2.3: UGAs will be determined by projections of population growth in both rural and urban areas of the County. These projections shall be reached through negotiation at the KCCOG, taking into account current growth rates and the Office of Financial Management (OFM) anticipated population projections.

Policy 2.4: The subdivision, rezone, capital improvements, and governmental service decisions of all County governmental jurisdictions should be directed by their projected share of growth and should be in proportion to that projected share of growth. These projections will be reviewed on an annual basis as needed at a regularly scheduled KCCOG meeting.

Policy 2.5: Proposals for development, subdivisions, and public projects within the unincorporated UGAs shall be subject to joint review by the County and the affected incorporated jurisdictions according to the development standards and comprehensive plans. The County shall enforce these standards as agreed upon in the joint permit review process or interlocal agreements.

Policy 2.6: Subdivisions and development within the UGAs shall be orderly and coordinated between County and city governments and utility service purveyors.

Policy 2.7: Within UGAs, the forming of unincorporated areas of suburban density shall be planned and coordinated.

Policy 2.8: The County should consider the use of joint SEPA lead agency status with any incorporated area for projects within a UGA to ensure coordination of mitigation for potential environmental impacts.

Policy 2.9: Final development approval will continue to reside with the County for areas outside of City limits.

Policy 2.10: Consistent development regulations and development standards including but not limited to: street alignment and grade, public road access, right-of-way, street improvements, sanitary sewer, storm water improvements, power, communications, utilities, park and recreation facilities, and school facilities should be adopted for areas within the identified twenty (20) year UGA boundaries for each jurisdiction within Kittitas County.

Policy 2.11: To encourage logical expansions of municipal boundaries into UGAs and to enable the most cost-efficient expenditure of public funds for the provision of municipal services into newly annexed areas, the County and the respective cities shall jointly develop and implement development, subdivision and building standards, coordinated permit procedures, and innovative financing techniques including the possibility of development impact or other fees for the review and permitting of any new development within UGAs.

Policy 2.12: City services should not be extended outside 20-year UGAs; however municipal services may be extended to serve a Master Planned Resort approved pursuant to the Kittitas County Comprehensive Plan Master Planned Resort Policies and RCW 36.70A.360. Such services include, but are not limited to: central sewage collection and treatment, public water systems, urban street infrastructure, and storm water collection facilities.

Policy 2.13: County adoption of city standards for development within corresponding UGAs shall be negotiated. These may include the following:

1. Street locations, both major and secondary
2. Street right-of-way
3. Street widths
4. Curbs and gutters
5. Sidewalks
6. Road construction standards
7. Cul-de-sacs, location and dimensions
8. Storm drainage facilities, quantity, quality, and discharge locations
9. Street lights, conduit, fixtures, locations
10. Sewer, septic regulations, private sewer, dry sewer facilities
11. Water, pipe sizes, locations, construction standards
12. Electrical and natural gas distribution systems
13. Communication utilities, telephone, cable TV, etc.
14. Fire protection, station locations, fire flows, uniform codes
15. School facilities
16. All building requirements
17. Subdivision and platting requirements
18. Mobile homes and manufactured home regulations
19. Zoning ordinances: permitted uses in UGAs, setbacks, building heights, lot coverage, etc.
20. Libraries
21. Any other like services.

Policy 2.14: The availability of the full range of government services will be subject to the annexation policy of the adjacent municipality. Utility extensions into the UGA shall be consistent with the adopted comprehensive plan and capital facilities plan of the utility purveyor.

Policy 2.15: In rural unincorporated areas outside UGAs, the County may designate limited areas of more intensive rural development (LAMIRD), consistent with the provisions of RCW 36.70A.070(5).

Policy 2.16: All planning efforts within UGAs associated with an incorporated city shall be accomplished on a joint basis between the city and the County and include participation from residents of unincorporated areas to the satisfaction of the County.

Policy 2.17: Amendments or changes to the UGA designation may only be proposed once a year and must be reviewed by the KCCOG. Amendments may only be proposed by a city or the County.

Policy 2.18: Amendments to the UGA shall be mutually agreed upon between a city and the County. The KCCOG shall review and make recommendations regarding UGA amendments that have the potential to affect population allocations.

Policy 2.19: An amendment to a UGA shall only be approved once the city or the County has demonstrated that the UGA designation criteria listed in policies 2.1 through 2.4 have been met.

## 3. REDUCE SPRAWL

Objective: To reduce the inappropriate conversion of undeveloped land including farmland into sprawling, low-density development.

Policy 3.1: Commercial developments including retail, wholesale or service related activities having a gross floor area more than 4,000 square feet, with associated parking facilities, shall be located only within UGAs and Limited Areas of More Intense Rural Development (LAMIRDs). When commercial facilities are developed in conjunction with an approved Master Planned Resort, those portions of hotel/motel, short-term visitor accommodations, residential uses, conference and meeting rooms, and eating and drinking, and active recreation service facilities which are not devoted to retail sales shall not be subject to the 4,000 square foot limitation. All other retail, wholesale, or service related facilities included in the Master Planned Resort shall be subject to the 4,000 maximum square foot size.

Policy 3.2: New industrial development which is not resource-based and requires urban services and zoning permits shall be located only within UGAs or industrial zoned land. Temporary industrial uses may be allowed within Master Planned Resorts approved by the County pursuant to RCW 36.70A.360 and the County Comprehensive Plan Master Planned Resort policies; provided, however, that any such use shall be limited to master planned resort construction, development, maintenance, and operational purposes and shall be subject to annual review and approval by the County. Nothing in this section shall prohibit Master Planned Resorts approved by the County from continuous maintenance and operational needs of such resorts.

Policy 3.3: Planned Unit Developments (PUDs) which include commercial and/or industrial uses in addition to residential uses shall be located in UGAs or Master Planned Resorts pursuant to RCW 36.70A.360 and .362, and the County's Comprehensive Plan Master Planned Resort Policies.

Policy 3.4: The location of all PUDs shall be established to foster the efficient expansion and management of infrastructure and utilities and demonstrate compatibility with resource land uses; impact fees may be assessed to compensate the cost of increased demands upon infrastructure, services, and utilities.

Policy 3.5: Only residential PUDs will be allowed outside of UGAs and LAMIRDs and are subject to the policies contained herein; densities of PUDs allowed outside UGAs and LAMIRDs shall be determined by the underlying zone classification.

Policy 3.6: The County may authorize master planned resorts in Kittitas County pursuant to RCW 36.70A.360 and .362, and the County's Comprehensive Plan Master Planned Resort Policies.

## 4. <u>TRANSPORTATION</u>

Objective: To provide for adequate and appropriate transportation systems within the County that are coordinated with county and city comprehensive plans.

Policy 4.1: Transportation plans (i.e., transportation elements of comprehensive plans) shall promote the development and implementation of a safe, efficient, and environmentally sound transportation system in accordance with federal and state requirements, including the State's Growth Management Act that is responsive to the community.

Policy 4.2: Transportation plans will support the planning goals for comprehensive plans set forth in RCW 36.70A.020 and 36.70A.070(6), including promotion of economic development consistent with available resources and public services and facilities.

Policy 4.3: Transportation plans will be consistent with their respective comprehensive plans and will be compatible with the applicable components of other local and regional transportation plans (e.g., QUADCO Regional Transportation Planning Organization, bordering counties, WSDOT and local agencies).

Policy 4.4: The County and cities shall cooperate in the analysis of, and response to, any proposed major regional industrial, retail/commercial, recreation, or residential development proposals that may impact the transportation system in Kittitas County.

Policy 4.5: Transportation plans and project prioritization shall be developed in active consultation with the public.

Policy 4.6: Inter-jurisdictional transportation plans shall promote a coordinated and efficient multi-modal transportation system, including alternative forms of transportation for the movement of goods and people.

Policy 4.7: The transportation plans will, to the maximum extent practical, provide a safe and environmentally sound system that meets community, elderly, disabled and low-income population needs.

Policy 4.8: Transportation improvements which are necessary to maintain the identified level of service standards shall be implemented concurrent with new development so that improvements are in place at the time of development, or that a financial commitment is provided to ensure completion of the improvements within six years.

## 5. HOUSING

Objective: To encourage the availability of affordable housing to all economic segments of the population, promote a variety of residential densities and housing types typical of the character of Kittitas County, and preserve existing, useful housing stock.

Policy 5.1: Consistent with RCW 36.70A.070(2)(c) a wide range of housing development types and densities within the county will be encouraged and promoted; including multiple-family and special needs housing, to provide affordable housing choices for all.

Policy 5.2: All types of housing for individuals with special needs should be allowed by all jurisdictions.

Policy 5.3: Multi-family housing meeting the needs of all income levels should be encouraged by all jurisdictions within Urban Growth Areas.

Policy 5.4: Jurisdictions shall consider innovative economic techniques and strategies for providing affordable housing as part of their economic development strategy.

## 6. ECONOMIC DEVELOPMENT

Objective: To provide an environment encouraging economic growth within the County and its jurisdictions that is compatible with County character.

Policy 6.1: The jurisdictions in Kittitas County will work with local and regional economic development interest groups in preparing and implementing economic development plans.

Policy 6.2: Economic vitality and job development will be encouraged in all the jurisdictions consistent with all comprehensive plans developed in accordance with the Growth Management Act.

Policy 6.3: Economic development activities will be implemented in a manner which supports our quality of life and is consistent with comprehensive plans. This can be achieved by:

1. Recognizing that education and training which produce a skilled work force are essential to the county's economic vitality.
2. Basing the level of economic development activity on our ability to manage the resulting growth.
3. Requiring urban non-resource based economic development activities to locate within designated UGAs or incorporated cities.
4. Requiring economic development proposals to show how increased services and infrastructure support will be provided.
5. Undertaking countywide and regional efforts to coordinate economic development activities.
6. Ensuring that the economic development element of local comprehensive plans and countywide and regional growth management plans are compatible.

## 7. PROPERTY RIGHTS

Objective: To ensure that private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.

Policy 7.1: The rights of property owners operating under current land use regulations shall be preserved unless a clear public health, safety, or welfare purpose is served by more restrictive regulation.

Policy 7.2: Surface water runoff and drainage facilities shall be designed and utilized in a manner which protects against the destruction of property and the degradation of water quality.

## 8. PERMITS

Objective: To ensure predictability by processing applications for both state and local government permits in a timely and fair manner.

Policy 8.1: Upon receipt of a complete application, land use proposals and permits shall be expeditiously reviewed and decisions made in a timely manner.

## 9. NATURAL-RESOURCE BASED INDUSTRIES

Objective: To maintain and enhance natural resource-based industries, including but not limited to: productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.

Policy 9.1: Industrial developments which are solely resource based may be permitted beyond UGAs.

Policy 9.2: Industries and commercial developments which provide for and/or compliment sales of agricultural production and agricultural tourism, or enhance recreational tourism within the County shall be encouraged within rural areas.

Policy 9.3: All economic development and population growth in the County shall be accommodated in a manner that minimizes impacts on agricultural land, forestry, mineral resources, shorelines, and critical areas.

## 10. <u>OPEN SPACE AND RECREATION</u>

Objective: To encourage the retention of open space and development of recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks.

Policy 10.1: Preserve open space and create recreational opportunities through the use of innovative regulatory techniques and incentives such as but not limited to: purchase of development rights, transfer of development rights, conservation easements, Public Benefit Rating System, and level of service standards.

Policy 10.2: New park and recreational facility plans shall include natural features, topography, floodplains, relationship to population characteristics, types of facilities, various user group needs, and standards of access including travel time.

Policy 10.3: Indoor and outdoor recreation facilities shall be designed to provide a wide range of opportunities allowing for individual needs of those using these facilities.

Policy 10.4: Expansion and enhancement of parks, recreation, scenic areas, and viewing points shall be identified, planned for, and improved in shorelands and urban and rural designated areas.

## 11. <u>ENVIRONMENT</u>

Objective: To protect and enhance the County's quality of life and rural environment by safeguarding its environmental resources.

Policy 11.1: All jurisdictions shall protect critical areas through comprehensive plans and policies and develop regulations that are consistent with the adopted environmental ordinances.

Policy 11.2: Groundwater should be identified and protected, including appropriate protection of aquifer recharge areas. Supplies of potable domestic water, irrigation water, and firefighting water should be ensured in the rural, suburban, and urban areas.

Policy 11.3: Water rights are those rights defined in state law, including RCW 90.03.010 and 90.44.035, as well as those rights as defined by agreements between the State and the County.

## 12. CITIZEN PARTICIPATION

Objective: To encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.

Policy 12.1: The County and cities shall provide regular and ongoing opportunities for public review and comment throughout the Comprehensive Plan development process.

Policy 12.2: The County and cities shall continue to encourage public awareness of the Comprehensive Plan by providing public participation opportunities and public education programs designed to promote a widespread understanding of the Plan's purpose and intent.

Policy 12.3: The County and cities shall encourage citizen participation throughout the planning process as mandated by state statute and codes for environmental, land use, and development permits.

Policy 12.4: The County and cities shall utilize broad based Citizen Advisory Committees to participate and assist in the development of Comprehensive Plan Elements, sub-area plans, and functional plans as necessary.

## 13. PUBLIC FACILITIES AND SERVICES

Objective: To ensure that public facilities and services necessary to support development shall be adequate to serve the development at the time of occupancy and service levels are not decreased below minimum standards.

General Public Facilities and Services

Policy 13.1: Planning and financing for public facilities to serve potential business and industries except natural resource based should be limited to urban growth areas.

Policy 13.2: Siting requirements for County public facilities within UGAs shall be jointly and cooperatively established with the municipalities. Municipal services should be extended by cities within unincorporated areas of UGAs.

Policy 13.3: The cities and the County shall develop a cooperative communication process through KCCOG, which includes public involvement at an early stage, to consider siting of city, countywide, and statewide public facilities, including but not limited to, solid waste disposal, correctional, transportation, education and human service facilities.

Policy 13.4: The siting of any public facility requires that the facility location be compatible with area land uses. Local comprehensive plans and regulations will establish standards to ensure such compatibility.

Policy 13.5: In determining a local government's fair share of siting of public facilities, the decision maker shall consider at least the following:

1. The location and effect of existing public facilities on the community.
2. The potential for re-shaping the economy, the environment, and the community character resulting from the siting of the facility.

Policy 13.6: The County and cities should jointly sponsor the formation of Local Improvement Districts for the construction or reconstruction of infrastructure to a common standard which are located in the city and the Urban Growth Areas

Policy 13.7: The levels of service for capital facilities shall be cooperatively defined, planned, and financed by all segments of the public and private sector involved in providing a particular service.

Policy 13.8: Financing methods for infrastructure serving residential needs should be mitigated for resource lands as designated by the County in keeping with anticipated levels of service impact.

Policy 13.9: All development should be evaluated so that it is assigned a fair and proportionate share of future infrastructure costs within UGAs and other designated service areas.

Policy 13.10: All jurisdictions shall participate in identifying needed regional services. All jurisdictions shall cooperate to identify adequate revenue sources and in creating financing mechanisms for regional services and infrastructure. Financing mechanisms may include increment financing or tax base sharing.

Policy 13.11: All jurisdictions shall coordinate bond elections for capital facility planning and financing.

Policy 13.12: Public facilities will not be located in Resource Lands or Critical Areas unless no feasible alternative site location exists, such as in the case of utility transmission facilities.

Essential Public Facilities

Policy 13.13: The comprehensive planning process in each jurisdiction shall identify land for all essential public facilities of city, countywide, or statewide significance, such as human service facilities, educational or solid waste handling facilities, transportation facilities, correctional facilities and in-patient care facilities.

Policy 13.14: Essential public facilities requiring siting outside cities or UGAs must be self-supporting and must not require the extension, construction, or maintenance of municipal services and facilities. Criteria shall be established that address the provision of services when siting an essential public facility. Essential public facilities should not be located outside cities or designated twenty-year urban growth areas unless the nature of their operations needs or dictates that they be sited in the rural area of the County.

Policy 13.15: Essential public facilities shall be sited in places that enhance the region's development strategy and that encourage their efficient use by the public.

Policy 13.16: All jurisdictions shall identify existing essential public facilities including but not limited to:

1. Utility corridors, sewer, water, power and communication facilities
2. All transportation facilities
3. Landfills, solid waste handling, and disposal facilities
4. Sewage treatment facilities
5. Recreational facilities
6. Schools
7. Municipal facilities (city halls, fire stations, police stations, libraries, and post offices)
8. Parks
9. State and local correctional facilities
10. In-patient facilities, including substance abuse facilities
11. Mental health facilities
12. Group homes
13. Secure community transition facilities
14. Any facility on the state ten-year capital plan maintained by the Office of Financial Management

Policy 13.17: All jurisdictions shall establish a countywide process for siting essential public facilities of region-wide significance. This process will include:

1. An inventory of needed facilities;
2. A method of fair share allocation of facilities;
3. Economic and other incentives to jurisdictions receiving such facilities;
4. A method of determining which jurisdiction is responsible for each facility;
5. A public involvement strategy; and
6. Assurance that the environment and public health and safety are protected.

Policy 13.18: Essential public facilities which are identified by the County, by regional agreement, or by State or Federal government shall require public involvement through meetings and hearings, and involve review and comment from citizens and local jurisdictions.

Policy 13.19: All jurisdictions shall strive to locate regional and essential public facilities so as to distribute them equitably countywide. No single community shall be required to absorb an undue share of the impacts of regional and essential facilities.

## 14. Historic Preservation

Objective: To identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.

Policy 14.1: The County and cities shall consult with local historic preservation groups to ensure coordination of plans and policies by the Department of Archaeology and Historic Preservation.

Policy 14.2: The County and cities shall consult with local historic preservation groups and/or advisory groups as appropriate.

## GLOSSARY OF TERMS

| | |
|---|---|
| **Capital Facilities:** | Capital Facilities are those physical features or assets which provide a public service such as, but not limited to: fire stations, water towers, police stations, libraries, highways, sewage treatments plants, communication, and recreation facilities. |
| **Development Impact Fees:** | Development impact fees mean a payment of money imposed upon development as a condition of development approval to pay for public facilities needed to serve new growth and development, and that is reasonably related to the new development that creates additional demand and need for public facilities, that is a proportionate share of the cost of the public facilities, and that is used for facilities that reasonably benefit the new development. Impact fee does not include a reasonable permit or application fee. |
| **Development Regulations:** | Development regulations means any controls placed on development or land use activities by a county or a city, including but not limited to: zoning ordinances, official controls, planned unit development ordinances, subdivision ordinances, and binding site plans ordinances. |
| **Development Standards:** | Development standards mean any required minimal functional standard which describes or defines how development is to occur. Development standards are intended to serve as an established level of expectation by which development is required to perform. |
| **Essential Public Facilities:** | Essential public facilities include those facilities that are typically difficult to site, such as: airports; state education facilities; state or regional transportation facilities; state and local correctional facilities; solid waste handling and disposal facilities; and in-patient facilities including substance abuse facilities, mental health facilities, group homes and other health facilities. |
| **Interlocal Agreements:** | Interlocal agreements mean any binding agreements, contracts, or other stipulations between two or more governing entities which implement the provisions of the County-wide Planning Policies. |
| **LAMIRD:** | Limited Areas of More Intense Rural Development (LAMIRDs) are an optional designation available through the Growth Management Act to recognize areas of rural |

development that are more intensive than the balance of the rural area. The LAMIRD designation allows for redevelopment and infill in historical rural towns and communities, as well as intensification and new development of isolated small businesses and small-scale recreational uses. Specific guidance for designation and development in LAMIRDs is provided in RCW 36.70A.070(5).

**Level of Service:** A level of service is an indicator of the extent or degree of service provided by, or proposed to be provided by a public facility, such as, but not limited to, fire protection, water supply, sewage treatment, library services, highways, and communication and recreational services.

**Local historic preservation group:** Local historic preservation group means a committee, advisory board or other group that is designated by a local jurisdiction or recognized by the Washington State Department of Archaeology and Historic Preservation.

**Local Improvement District:** Local improvement district means the legislative establishment of a special taxing district to pay for specific capital improvements.

**Municipal Services:** Municipal services are those services in keeping with and/or required in incorporated cities such as, but not limited to, centralized sewage collection and treatment, public water systems, urban street infrastructure, power and storm water systems, emergency services, libraries, and government.

**Planned Unit Development:** A planned unit development is the result of a site specific zone change, based on a binding site plan. The planned unit development zoning district is intended to encourage flexibility in design and development that will result in a more efficient and desirable use of land.

**Policy:** A broad based statement of intent that gives management direction or guidance in the decision making process. The policy statement is used to select a primary course of action.

**Resource Lands:** Resource lands mean those lands designated by the County which are to be protected from urban growth encroachments and incompatible land uses. Resource lands include all lands designated as Commercial Forest, Forest and Range, Agricultural Lands of Long-Term Commercial Significance, and Mineral Resource Lands.

**Transfer of Development Rights:** Transfer of development rights are the conveyance of development rights to another parcel of land where restrictions places on development of the original parcel prevent its previously allowed development. Transfer of development rights are usually associated in a program which involves sending and receiving zones.

**Urban Growth Areas:** Urban growth areas are those areas designated by the County or an incorporated city and approved by the County, in which urban growth is encourages. Urban growth areas are suitable and desirable for urban densities as determined by the sponsoring jurisdiction's ability to provide urban services.

**Utilities:** Utilities mean the supply, treatment, and distribution, as appropriate, of domestic water, sewage, stormwater, natural gas, electricity, telephone, cable television, microwave transmissions, and streets. Such utilities consist of both the service activity along with the physical facilities necessary for the utilities to be supplied. Utilities are supplied by a combination of general purpose local governments as well as private and community based organizations.

**Comment #011**

| | |
|---|---|
| **From:** | Sears, Tricia (DNR) |
| **To:** | Jeremy Johnston |
| **Cc:** | Sears, Tricia (DNR); Watson, Deanah (COM) |
| **Subject:** | Kittitas County's Comprehensive Plan and Critical Areas Ordinance Amendments (2026-S-11466): WGS comments |
| **Date:** | Friday, February 13, 2026 5:54:32 PM |



Hello Jeremy,

In keeping with the interagency correspondence principles, I am providing you with comments on

For this proposal submitted via Planview, I looked at the proposal and focused on areas related to WGS work. Of note, but not limited to, I look for language around the geologically hazardous areas, mineral resource lands, mining, climate change, and natural hazards mitigation plans.

Specifically in this proposal, I reviewed the Critical Areas Checklist Kittitas_ 06052025, KCC 17A_Critical Areas Ordinance_25.12.31, and Kittitas Comp Plan V3.0 RedlinesPDF.

Kudos to you for making changes to the critical areas ordinance and comp plan!

Critical Areas Checklist Kittitas_ 06052025
The checklist is filled out. No further comment.

KCC 17A_Critical Areas Ordinance_25.12.31

Definitions that are included: alluvial fan, avalanche hazard, best available science, erosion, erosion hazard areas, geologically hazardous areas, geotechnical analysis or geotechnical report, landslide hazard areas, mine hazard areas, qualified professional, seismic hazard areas, and volcanic hazard areas. Good. Consider adding the WAC reference to the definitions of hazards.

On page 12-13 the code describes that temporary or permanent field identification may be required. Great to see the provisions noting passable wildlife fencing and signage.

On page 13, great to see the requirement that all the critical areas are required to be noted and recorded to the title.

On page 14, the construction details provisions does not include a stormwater management detail to describe how the stormwater on the property will be managed. Suggest adding that.

On page 17, under "Critical areas may be affected by proposal, " suggest including a reference to the

Comment #011

Washington Department of Natural Resources in addition to the reference to Ecology and Fish and Wildlife. DNR, via Washington Geological Survey, provides BAS for geologically hazardous areas.
On page 33, KCC § 17A.02.620. Qualified professional. "A qualified professional for preparing Geologically Hazardous Area Assessments must be a professional geologist or engineering geologist licensed in the State of Washington." Great!

On page 59 "§ 17A.06.020. Designation, classification, and mapping. Designation. Lands classified as landslide, erosion (including channel migration zones), alluvial fan, seismic, and mine hazard areas, are hereby designated as geologically hazardous areas."

Great to see the detailed provisions about alluvial fan! Great to the Washington Department of Natural Resources mentioned on page 61 with mapping info. DNR has more maps than the historic maps that are mentioned. Suggest including a reference to the Washington Geologic Information Portal.
On page 62, good to see "Critical facilities prohibited. Critical facilities shall not be sited within landslide, erosion, alluvial fan, or mine hazard areas unless there is no other practical alternative."

On page 66, the code refers to the Geologically Hazardous Areas Risk Assessment and a Geotechnical Report. Geotechnical report has a definition in the code. That definition does not include the term Geologically Hazardous Areas Risk Assessment. Suggest adding that term to the definition so the terms are both defined and in agreement. Also, so it is clear that there is just one type of geotechnical report/review/assessment rather than a tiered approach.

Overall, the code provisions are thoughtful, well-written, and detailed. Nice work!

Kittitas Comp Plan V3.0 RedlinesPDF
Due to time constraints, I cannot provide a detailed review of the comp plan. In a quick look at it, it looks ok.

Below, I include our usual language for this and future endeavors.

Recognizing the limitations of the current proposals, I want to mention that it would be great for you to consider these in current or future work, be it in your comprehensive plan, development code, and SMP updates, and in your work in general:

- Consider adding a reference to the definition of geologically hazardous areas, WAC 365-190-120, in other areas besides the CAO. In addition, consider adding a reference to WAC 365-196-480 for natural resource lands.

- Consider adding in other areas besides the CAO. If you have not checked our interactive database, the Washington Geologic Information Portal, lately, you may wish to do so. Geologic Information Portal | WA - DNR

- If you have not checked out our Geologic Planning page, you may wish to do so. Geologic Planning | WA - DNR

Thank you for considering our comments. If you have any questions or need additional information, please contact me. For your convenience, if there are no concerns or follow-up discussion, you may consider these comments to be final as of the 60-day comment deadline of 3/30/26.

Have a great day!
Tricia

Tricia R. Sears (she/her/hers)
**Geologic Planning Liaison**
Washington Geological Survey (WGS)
Washington Department of Natural Resources (DNR)
Cell: 360-628-2867 | Email: tricia.sears@dnr.wa.gov

# PUBLIC COMMENT ON THE EASTON SUBAREA PLAN

### What the Law Allows and Prohibits on Type 3 LAMIRD Land

Under the Growth Management Act and Kittitas County Code

To: Kittitas County Planning Department, Community Development Services and consultants,

As you update the Easton Subarea Plan, I am submitting this comment to request that the plan include clear, enforceable language defining what can and cannot be built on Type 3 LAMIRD land. The Growth Management Act, Kittitas County's Comprehensive Plan, and the County Code already set these standards. They just need to be stated plainly in the subarea plan so there is no ambiguity going forward.

This comment draws on the legal framework established by RCW 36.70A.070(5), RCW 36.70A.030(35), Kittitas County Code Chapter 17.15, the Critical Areas Ordinance (KCC Title 17A), the Kittitas County Comprehensive Plan, and relevant Growth Management Hearings Board decisions.

## 1. WHAT STATE LAW SAYS ABOUT TYPE 3 LAMIRDs

The Growth Management Act created Type 3 LAMIRDs under RCW 36.70A.070(5) as a narrow exception to general rural land use restrictions. The Legislature authorized counties to allow limited new commercial development in rural areas, but only when **all three** of the following conditions are met:

1. **Isolated small-scale business.** The development must be an isolated, small-scale business. This is not aspirational language—it is a ceiling on what can be built.
2. **Site previously occupied by an existing business.** Under RCW 36.70A.070(5)(d), the new development must utilize a site that was previously occupied by a business. LAMIRD designations are tied to areas or uses in existence prior to 1991. This is a threshold eligibility requirement, not a preference.
3. **Conforms to rural character.** The new business must conform to the rural character of the area as defined by the county government.

These are conjunctive requirements. A proposal that fails any one of them is ineligible for Type 3 LAMIRD development. The Growth Management Hearings Board confirmed in *People for a Liveable Community v. Jefferson County* (No. 03-2-0009c, 2003) that LAMIRDs are "intended to be a one-time recognition of existing areas and uses and are not intended to be used continuously to meet needs (real or perceived) for additional commercial and industrial lands."

## 2. THE HARD LIMITS: WHAT KITTITAS COUNTY CODE ALLOWS

Kittitas County implemented the GMA's Type 3 LAMIRD standards through KCC 17.15.070, which governs the rural General Commercial zoning district. These are the binding dimensional and intensity limits for any development on Type 3 LAMIRD land:

These limits exist to implement the GMA's "isolated small-scale business" standard. They are not starting points for negotiation. They are the maximum development intensity the Legislature intended for rural commercial land. Any proposal that exceeds these thresholds is, by definition, not a small-scale business and cannot be approved under Type 3 LAMIRD authority.

## 3. SITE ELIGIBILITY: THE PRE-EXISTING BUSINESS REQUIREMENT

Not every parcel within a Type 3 LAMIRD boundary is automatically eligible for new commercial development. RCW 36.70A.070(5)(d) requires that the site be one "previously occupied by an existing business." This means:

**Recommended subarea plan language:** *"No new commercial development shall be approved on Type 3 LAMIRD land unless the applicant demonstrates, through documented evidence including historical aerial photography and county records, that the specific parcel was previously occupied by a commercial business. Vacant or undeveloped land within a LAMIRD boundary does not satisfy this requirement."*

## 4. RURAL CHARACTER CONFORMANCE: WHAT THE STANDARD REQUIRES

Even when a proposal meets the size limits and site eligibility test, it must also conform to rural character. RCW 36.70A.030(35) defines rural character through seven criteria. Kittitas County has adopted its own local definition: rural character is "the predominant visual landscape of open spaces, mountains, forests, and farms and the activities which preserve such features."

Any new development on Type 3 LAMIRD land must satisfy all of the following:

- **Open space and natural landscape predominate** over the built environment (RCW 36.70A.030(35)(a))
- **Traditional rural lifestyles and rural-based economies** are fostered, not displaced (RCW 36.70A.030(35)(b))
- **Visual landscapes traditionally found in rural areas** are maintained (RCW 36.70A.030(35)(c))
- **Compatibility with wildlife and fish habitat** (RCW 36.70A.030(35)(d))
- **No inappropriate conversion of undeveloped land** into sprawling, low-density development (RCW 36.70A.030(35)(e))
- **No requirement for extension of urban governmental services** (RCW 36.70A.030(35)(f))
- **Protection of natural surface water flows and groundwater recharge/discharge areas** (RCW 36.70A.030(35)(g))

Additionally, Comprehensive Plan Policies T-P44 and RR-P2 discourage uses incompatible with resource lands and airports. The Easton area includes working forest land managed by the Washington State Department of Natural Resources and the Easton State Airport. WSDOT's Aviation Division has previously expressed concern about increased development densities around this airport. The subarea plan should explicitly require compatibility review for any proposal adjacent to resource lands or airport operations.

The GMA and Comprehensive Plan also prohibit strip commercial development along highway corridors. The subarea plan should include language preventing the clustering of commercial uses that would create a pattern of highway-oriented commercial sprawl.

## 5. CRITICAL AREAS PROTECTION: NON-NEGOTIABLE REQUIREMENTS

Much of the Easton LAMIRD area sits within or adjacent to designated Critical Aquifer Recharge Areas (CARAs). The Easton Water District depends entirely on groundwater for its domestic and drinking water supply. The subarea plan must incorporate the following existing legal requirements and make them explicit in the development review process:

**Recommended subarea plan language:** *"No development application within a Type 3 LAMIRD shall be approved without a verified critical areas review that cross-references the County's Critical Area CARA maps and Group A Wellhead Protection Area maps. A finding of 'no critical areas' is insufficient without documented evidence that the County's own CARA maps, wellhead protection area designations, and Critical Areas Ordinance requirements have been reviewed and addressed. All proposals within or within 200 feet of a CARA shall comply with mitigation sequencing under KCC 17A.01.100 and use Best Available Science to protect groundwater resources."*

## 6. CLEAR STATEMENT: WHAT YOU CAN AND CANNOT BUILD

Based on the full legal framework above, here is a plain-language summary of what is and is not permissible on Type 3 LAMIRD land in the Easton area. I request that the subarea plan incorporate this distinction explicitly:

### WHAT YOU CAN BUILD

- A small-scale commercial business that fits within 30,000 square feet of total use area
- Retail uses that do not exceed 4,000 square feet
- Development that keeps impervious surface at or below 33% of the lot
- New business on a site with documented prior commercial occupancy
- Uses that preserve the visual landscape of open spaces, forests, and farms
- Uses compatible with adjacent resource lands, airports, local resort business, and outdoor recreation
- Development that protects groundwater recharge areas and meets Best Available Science standards
- Businesses that provide job opportunities for rural residents without requiring urban services

### WHAT YOU CANNOT BUILD

- Any development exceeding 30,000 square feet of total use area
- Any retail component exceeding 4,000 square feet
- Any project with impervious surface coverage exceeding 33% of the lot
- New commercial development on vacant or undeveloped land with no documented prior business use
- Large-scale highway-oriented commercial facilities (travel centers, large fuel stations, multi-use commercial complexes)

- Development that converts open space, forest, or natural landscape into predominantly built environment
- Uses that create strip commercial patterns along highway corridors, especially near other LAMIRD commercial uses
- Uses incompatible with adjacent working forest land, airport operations, or outdoor recreation values
- Any development within a Critical Aquifer Recharge Area that has not undergone a verified CARA review, mitigation sequencing, and Best Available Science analysis
- 24/7 commercial operations that generate noise, light pollution, and heavy vehicle traffic incompatible with rural character

## 7. USE THE RIGHT PROCESS FOR THE RIGHT PROPOSAL

The subarea plan should make clear that a variance is not the appropriate mechanism for approving development that exceeds Type 3 LAMIRD dimensional standards. A variance addresses minor deviations in cases of practical difficulty or unnecessary hardship. It is not a tool for authorizing development at a fundamentally different scale or intensity than what the zoning allows.

**Recommended subarea plan language:** *"Any proposed development that exceeds the dimensional standards established in KCC 17.15.070 for rural General Commercial zoning shall not be processed as a variance. Proposals that would fundamentally alter the character, scale, or intensity of land use shall be evaluated as a Comprehensive Plan amendment and rezone, subject to full public participation, environmental review, and policy analysis as required by the Growth Management Act."*

## 8. SUMMARY OF REQUESTED SUBAREA PLAN ADDITIONS

I respectfully request that the Easton Subarea Plan be updated to include the following provisions:

4. **Restate the binding dimensional limits** from KCC 17.15.070 (30,000 sq ft total area, 4,000 sq ft retail, 33% impervious surface) as hard caps that cannot be exceeded through variance.
5. **Require documented proof of prior commercial occupancy** through historical aerial photography and county records before any Type 3 LAMIRD development is approved.
6. **Mandate verified critical areas review** cross-referenced against County CARA maps and Group A Wellhead Protection Area maps for every development application.
7. **Require mitigation sequencing and Best Available Science** for all proposals within or within 200 feet of a Critical Aquifer Recharge Area.
8. **Require compatibility review** for proposals adjacent to DNR resource lands and the Easton State Airport, consistent with Comprehensive Plan Policies T-P44 and RR-P2.
9. **Prohibit strip commercial development patterns** along highway corridors, consistent with GMA and Comprehensive Plan policy.
10. **Direct over-scale proposals to the Comprehensive Plan amendment and rezone process,** not variance, to ensure adequate public participation and environmental review.

## 9. ADDITIONAL COMMENTS ON THE EASTON SUBAREA PLAN

In addition to the Type 3 LAMIRD development standards addressed above, I am submitting the following comments on other sections of the Easton Subarea Plan. These comments address gaps in the plan's treatment of housing, economic development, wastewater infrastructure, and wildfire mitigation, areas where the plan needs stronger, more actionable language to serve this community.

### 9.1 Housing: The Plan Must Be Specific About Affordable and Workforce Housing

The Housing section of the Subarea Plan (Section 3) acknowledges that Easton's population is aging, that renter-occupied units have declined by 55%, and that the community has expressed strong interest in affordable housing for young families and first-time buyers. However, the plan's goals and policies remain too general to produce results. The plan references "affordable housing options" and "property improvements" without defining what affordable means in the Easton context, without identifying specific housing types, and without committing to measurable targets.

The community's own comments are specific: they want starter homes, affordable single-family homes for first-time buyers, ADUs on R-5 lots, and protections against outside investment driving up prices. The plan should match that specificity. I recommend the following additions:

**a.** Define "affordable housing" in the plan using a standard benchmark: housing that costs no more than 30% of the area median household income. The plan should state this threshold explicitly so that future policy decisions can be measured against it.

**b.** Include workforce housing as a distinct category. Workforce housing serves the people who work in the community, teachers, fire district staff, service workers, school employees but cannot afford to live here. The plan should explicitly commit to creating housing options for households earning between 60% and 120% of area median income.

**c.** Set a measurable housing target. Based on the plan's own data showing 408 residents and an aging population, the community should set a goal of 20–40 new affordable and workforce housing units within ten years within the Type 1 LAMIRD, tied to wastewater infrastructure capacity (see Section 9.3 below).

**d.** Add short-term rental protections. Community members specifically raised concerns about outside investors driving up prices and short-term rentals overtaking housing stock. The plan should include policy language directing the county to regulate or limit short-term rentals within the LAMIRD to protect the community's housing supply for full-time residents.

**e.** Identify specific grant programs for affordable housing development in the recommended actions, including the Washington Housing Trust Fund, USDA Multi-Family Housing Direct Loans (up to $50M for rural communities under 35,000 population), and HUD Community Development Block Grants through Washington Commerce.

## 9.2 Economic Development: The Plan Needs a Market Analysis and Actionable Strategy

The Economic Development section (Section 4) identifies community desire for revitalization of Railroad Street and small local businesses. It proposes walking tours, vision boards, and consulting with railroad operators as recommended actions. While community engagement is valuable, these actions alone will not generate jobs, attract businesses, or close the service gaps residents have identified. Walking tours and vision boards are process steps, not economic development outcomes.

The plan contains no market analysis. There is no assessment of what types of businesses are financially viable in a community of 408 residents with seasonal recreational traffic. There is no estimate of consumer demand, visitor spending capture, or revenue potential for the types of businesses residents want (coffee shops, restaurants, gear rental, small retail). Without this analysis, the plan is asking the community to pursue economic development without knowing what the market will support.

I recommend the following additions to the Economic Development section:

**a.** Commission or include a basic market analysis as a recommended action within the first year. This does not need to be expensive, EDA Planning and Technical Assistance Grants (up to $300K) or USDA Rural Business Development Grants (up to $500K) can fund feasibility studies for rural commercial development. The analysis should assess: what types of businesses are viable given year-round and seasonal population, what the I-90 traffic volume (30,000+ vehicles per day) means in terms of capture potential, and what infrastructure prerequisites must be met before businesses can operate.

**b.** Tie the economic development goals directly to the wastewater infrastructure constraint. The plan acknowledges that the lack of a sewer or septic system is the primary barrier to development and school expansion (Section 5.3). No amount of vision-boarding will produce a coffee shop or restaurant on Railroad Street if there is no wastewater system to support it. The economic development section should state plainly that securing wastewater infrastructure funding is a prerequisite to Railroad Street revitalization, not a parallel effort.

**c.** Include job creation targets. The plan should set a measurable goal, even a modest one such as 15–25 new permanent jobs within five years from small businesses, cottage industries, and recreation-related services within the LAMIRDs.

**d.** Replace or supplement the walking tour and vision board actions with concrete steps: apply for an EDA Planning Grant for a Railroad Street market feasibility study within the first year; identify three to five specific business types the market will support and actively recruit them; and coordinate with the Kittitas County Economic Development Committee to integrate Easton into the county-wide economic development strategy currently being developed.

## 9.3 Wastewater Infrastructure: The Single Most Critical Prerequisite

The Subarea Plan identifies the lack of a septic or sewer system as the primary barrier to development and school expansion. Community members have raised this repeatedly in the March 2025 open house, in the April 2025 community meeting, and in ongoing discussions. It was the very first comment at the open house: “Need a large scale septic system to move

Easton forward." And yet the plan does not include a single recommended action, timeline, or funding strategy for securing wastewater infrastructure.

This is the linchpin. Without wastewater infrastructure, Railroad Street revitalization cannot happen. New businesses cannot operate. Housing expansion is constrained. The school cannot expand. The plan needs to state this clearly and include a concrete path forward. I recommend the following:

> **a.** Add a new goal: "EG 5.1: Secure funding for a community wastewater system to serve the Type 1 LAMIRD, enabling economic development, housing expansion, and school facility improvements."
>
> **b.** Include specific federal and state funding programs in the recommended actions: USDA Rural Utilities Water and Waste Disposal Grants and Loans (up to $5M per project for rural communities); EPA Clean Water State Revolving Fund through Washington Ecology; Washington Department of Commerce CERB infrastructure loans ($5M maximum at 1% interest); and USDA Rural Economic Development Loans and Grants through local utilities.
>
> **c.** Add a Year 2 implementation action: commission a wastewater feasibility study to assess system options (community septic, small-scale treatment, or decentralized cluster systems), estimated costs, and the most competitive federal or state funding programs. This study is a prerequisite to any grant application and should be prioritized alongside the communication networks and inventory milestones already in the implementation timeline.
>
> **d.** Add wastewater infrastructure as a milestone in the implementation timeline (Section 7.6), targeting feasibility study completion by Year 2 and grant application submission by Year 3.
>
> **e.** Change language where "restrooms" are mentioned to "tourism support services"

## 9.4 Wildfire Mitigation: The Plan Should Pursue Firewise Designation and Federal Funding

Section 6 of the Subarea Plan correctly identifies wildfire as a serious threat to the Easton community, noting that the USDA classifies risk to homes in Kittitas County as greater than 97% of counties in Washington. The plan includes a policy to "Create a Firewise Community Plan" (EP 6.1) and recommends seeking funding for fire mitigation. However, the recommended actions are limited to quarterly consultations, hosting an awareness day, and seeking general funding opportunities. These are awareness activities, not a funded mitigation strategy.

Kittitas County already has a strong foundation through KFACC (Kittitas Forest and Fire Adapted Communities Coalition), which has secured $10 million in federal funding for forest thinning and has established 18 recognized Firewise Communities in the county. Easton should build on this existing infrastructure rather than starting from scratch. I recommend the following additions:

> **a.** Set an explicit goal of achieving Firewise USA community recognition for the Easton area within two years. This is a structured national program administered by the National Fire Protection Association that provides a framework for community-level wildfire preparedness, and recognized communities may qualify for insurance premium reductions of 10–20%, a direct financial benefit to every homeowner in the area.

**b.** Include specific federal grant programs in the recommended actions: USDA Community Wildfire Defense Grants ($250K–$10M for fuels reduction planning and treatment, annual cycle typically in spring); FEMA Fire Prevention and Safety Grants (up to $200K for Firewise community programs); FEMA Building Resilient Infrastructure and Communities (BRIC) grants for hazard mitigation projects; and Washington DNR Forest Health Grants for fuels reduction and forest restoration.

**c.** Add a Year 1 implementation action: coordinate with KFACC and Fire District 3 to conduct a Wildland-Urban Interface assessment specific to the Easton subarea, map defensible space needs for properties within and adjacent to the LAMIRDs, and submit a USDA Community Wildfire Defense Grant application by the next annual cycle.

**d.** Add wildfire mitigation funding as a milestone in the implementation timeline (Section 7.6), targeting Firewise recognition by Year 2 and a federal fuels-reduction grant application by Year 1.

The laws already exist. The limits are already on the books. The Easton Subarea Plan is our opportunity to make sure they are applied clearly and consistently so that the rural character of this community is protected for the long term. But protection alone is not enough. This plan must also give Easton’s residents the tools they need to build a sustainable future, affordable housing they can actually live in, businesses that can actually operate, wastewater infrastructure that unlocks both, and wildfire protections funded by the federal and state programs that exist for exactly this purpose. Thank you for considering these comments.

Respectfully submitted,

Gina Peckman,
Easton Community member

## APPENDIX: LEGAL CITATIONS REFERENCE

| Citation | What It Establishes |
|---|---|
| **RCW 36.70A.070(5)** | Type 3 LAMIRDs limited to “isolated small-scale businesses” |
| **RCW 36.70A.070(5)(d)** | Requires “site previously occupied by an existing business” |
| **RCW 36.70A.030(35)** | Seven-part definition of rural character |
| **KCC 17.15.070** | 30,000 sq ft maximum, 33% impervious surface limit |
| **KCC 17.15.070.2(48)** | 4,000 sq ft retail sales limit |
| **KCC 17A.03.020** | Critical Aquifer Recharge Area designation and review |
| **KCC 17A.02.020** | 200-foot buffer regulation around CARAs |
| **KCC 17A.01.100** | Mitigation sequencing for adverse impacts to critical areas |
| **Comp Plan Policies T-P44, RR-P2** | Discourage uses incompatible with resource lands and airports |
| *People for a Liveable Cmty. v. Jefferson County* (2003) | LAMIRDs are “one-time recognition,” not ongoing expansion mechanism |