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Snohomish County
Planning and Development Services

Aaron Reardon
 County Executive

(425) 388-3311
 FAX (425) 388-3872

M/S #604
 3000 Rockefeller Avenue
 Everett, WA 98201-4046

REVIEW COMPLETION COMMENTS

FILE NO: 07-101924 LU

DATE COMMENTS AVAILABLE: July 14, 2008
MEETING DATE: July 17, 2008

PROJECT NAME: Granite Fall Motorcross Park

APPLICANT:

Paul Thomas Motorcross Parks
 11411 116th PL
 Kirkland, WA 98034

CONTACT:

Gary Strode
 11411 NE 116th Pl
 Kirkland, WA 98034

PROJECT DESCRIPTION:

REZONE from F (Forestry) to F&R (Forestry and Recreation) and CONDITIONAL USE PERMIT for the construction of a Motorcross Race Track.

REQUIRED INFORMATION:

The following information is required to further evaluate your proposal.

Note: This application will expire one year after the date of this memorandum if the applicant fails to provide the requested information per SCC 30.70.140(1).

Planner Comments:

Project Manager: Scott Whitcutt 425.388.3311 Ext. 2680

We have copied you different citizen comments and the "peer review" comments regarding your noise study. It is important to remember that you, as the applicant, have the burden of supporting your request to the Hearing Examiner. The following concerns reflect our staff review of the submitted record. They are intended to provide guidance in providing clarification and addressing citizens concerns associated with your proposal.

- (a) Please provide a supplemental narrative that establishes greater specificity describing the current state of natural vegetative growth that will remain as a buffer between motor cross site development and adjacent right-of-way and properties. The record indicates the site has previously been cleared. Current conditions do not constitute old growth forested conditions that can be assumed to provide visual and sound buffering of the completed facility.
- (b) Please provide greater specificity in describing the proposed berm plantings at time of planting, and within two years of planting, that will not only provide for soil

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- stability but also provide visual buffering of the earthen berm that becomes a topographical feature. Your narrative should include a description of measures for the interior as well as exterior slopes of the berm.
- (c) Please provide written verification of water rights and potable water availability for the recreational facility.
 - (d) Please provide written verification of Snohomish Health District requirements and approval for temporary restrooms as well as septic system design for the facilities. It should be assumed that well water will be available for Phase 1 use of the motocross facility.
 - (e) Emergency fire flow is an additional "water issue" that must be addressed for the future construction of buildings, stands, and towers and use of the facility during phased expansion. An agreement with Fire District No. 17 may be required for emergency fire service. Fire flow, hydrants, water tank, and pump or gravity flow will have to be available and maintained for combustible construction and following final inspection or occupancy. Provide a supplemental narrative that addresses fire services consistent with county building and fire codes for all phases of site development, including construction of a 90,000 square foot covered track structure.
 - (f) Citizens have raised concern regarding emergency aide services being provided to users and/or spectators of the motor cross facility
 - (g) Please provide a supplemental narrative of revised traffic information required under Traffic Review comments. This supplemental narrative should focus on mitigation measures as well as consistency with comprehensive plan transportation policies.
 - (h) I have reviewed your December 4, 2007 submittal narrative and wish to note again comments Erik Olson forwarded to you at time of project transfer to me. You must address: the deeding of 10' of additional right-of-way and sight-distance issues as well as additional traffic information raised in the traffic comments (copied to this letter); and the drainage review comments (copied in this letter).
 - (i) I strongly encourage you to reconsider your proposed construction sequencing of the berm in terms of the duration of road impacts during phased site build-out and the more subjective issue of noise control through site build-out. I suggest that you consider construction and planting of the entire berm during the first phase of construction thus reducing the duration of traffic and noise impacts during an extended build-out as well as providing additional vegetative buffer that will take hold earlier rather than later.
 - (j) I suggest that you reconsider the maximum height of speakers for track and public announcements in relationship to the height of the proposed berm providing noise attenuation.
 - (k) I suggest that you provide additional information as to the height and type of facility pole lighting that will be used to avoid off-site glare.
 - (l) We will forward information regarding traffic trip counts as soon as they are available. Public Works was hoping to begin tabulation this past weekend.

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Drainage Comments:

Reviewer: Jack Hurley 425.388.3311 Ext. 2266

I reviewed the revised preliminary application for the proposed Granite Fall Motorcross Park for compliance with the requirements of:

Erosion hazard areas (SCC 30.62.200);
Landslide hazard areas (SCC 30.62.210);
Drainage codes and policies (SCC 30.63A);
Grading codes and policies (SCC 30.63B);
Snohomish County Drainage Manual (Department of Ecology Stormwater Management Manual for the Puget Sound Basin 1992 with Snohomish County Addendum);
Snohomish County Engineering Design and Development Standards (EDDS) 2004 Edition;
PDS Rule 3044.

The review was based on the submittal items received by PDS on December 4, 2007.

The submittal items that I reviewed include:

Master Permit Application;
Project Narrative;
Snohomish County Environmental Checklist;
Preliminary Plans;
Targeted Drainage Report;
Track and Facilities Management Plan;
Geotechnical Reconnaissance Report;
Critical Areas Review.

DISCUSSION:

In the revised documents the applicant provided the information related to the design of the infiltration system and water quality pond that was requested in the previous review memo.

The infiltration rate, used in the preliminary calculations, was established by the ASTM D422 (grain size analysis) procedure.

The one item from my previous memo that was not clearly addressed in this submittal was,

4. Provide description of water quality measures/procedures for motor cycle maintenance and fueling areas.

This issue was address in general terms, in various documents in this submittal, but there were no details provided. For example: The Snohomish County Environmental Checklist on page 8 item 7. a. states that '...small amounts of...could accidentally spill onto the ground...' The last item under ENVIRONMENTAL REQUIREMENTS in the Track and

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Facilities Management Plan states that 'Fueling of bikes must be done in designated areas.' However I did not find areas identified on the plans or a description of specific BMP's to prevent and deal with spills. The applicant may want to refer to Chapter IV-4 of Snohomish County Drainage Manual (Department of Ecology Stormwater Management Manual for the Puget Sound Basin 1992 with Snohomish County Addendum) for information on this.

INFORMATION NEEDED TO COMPLETE THE PRELIMINARY DRAINAGE AND GRADING REVIEW:

Provide description of water quality measures/procedures for motor cycle maintenance and fueling areas.

INFORMATION IN THE APPLICATION PACKAGE THAT WOULD HELP CLARIFY THE PROPOSAL:

The SEPA checklist does not address Septic System or Domestic Water Well. These items should be addressed in the SEPA Checklist.

In the SEPA Checklist and the Project Narrative there are multiple locations where the numbers written in English do not match the numbers in numeral format.

The information on page 3 and page 12 of the SEPA checklist related to parking do not seem to match.

Biologist Comments:

Reviewer: Frank Scherf 425.388.3311 Ext. 2725

This is in response to a final request to review the above referenced application revision, stamped received by Planning and Development Services on December 4, 2007.

Keith Westlund, Biologist, of Planning and Development Services conducted an on-site inspection on July 23, 2007 and July 27, 2007. Erik Olson, Jack Hurley and I visited the property on August 9, 2007. The subject property is approximately 437 acres in size and contains Canyon Creek that is a Type 1 ESA stream. Canyon Creek is a conservancy shoreline environment. Wetlands exist on the subject property as well as geohazard areas, which we covered under the drainage section.

Staff concurs with the Critical Areas Review conducted by Talasaea Consultants, Inc. The application was deemed complete on June 6, 2007 and therefore is subject to the requirements of Chapter 30.62 SCC (older version of the critical areas regulations) and not subject to the current effective October 1, 2007. The "site" does not contain any wetlands or streams. SCC 30.62.055(1)(a)(v) requires the location and description of all critical areas located on the site and on adjacent properties within 100 feet of site boundaries. Site is defined under SCC

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30.91S.350 as "that portion of the subject property within 200 feet of the development activity provided, however, that for subdivisions, short subdivisions, planned residential developments, and projects with binding site plans, the site shall include the entire subject property". The site therefore is defined as that area within 200 feet of the proposed clearing limits represented on the site development plan for this Conditional Use/Rezone application. The site is comprised of fairly uniform young even-aged conifers with a fairly depauperate understory. This is typical of a site that has been clear-cut and replanted without extensive thinning thereafter.

The application is in conformance with Chapter 30.62 SCC as it relates to stream and wetland preservation since there are no such features that exist within the "site". No further wetland, stream or ESA evaluation is in order unless the application is revised that enlarges the site boundaries.

Traffic Review Comments:

Reviewer: Kamal Mahmoud

This is in response to the submittal received by PDS from the applicant on December 4, 2007. In the Traffic/Drainage memo dated August 9, 2007 the following items were identified as needing to be addressed:

1. Justify trip distribution.
2. Address site distance.
3. Show the additional right-of-way to be deeded.

These items have not been satisfactorily addressed. Second comments are provided below.

The Traffic/Drainage Engineering Section of PDS has reviewed the subject development proposal for compliance with Chapter 30.66B SCC (Snohomish County's Traffic Mitigation and Concurrency Ordinances), Title 13 SCC, Snohomish County Engineering Design and Development Standards (EDDS), and the appropriate County Rules and procedures and has summarized that review below. This development proposal is subject to the requirements of the amended version of Chapter 30.66B SCC that became effective February 1, 2006.

1. General Information

- The plan used for this review was received by Planning and Development Services (PDS) on December 4, 2007.
- The applicant proposes to rezone 437 acres and develop an 80-acre motorcycle racetrack.
- The subject property is located off of Mountain Loop Highway, about 3.5 miles east of Granite Falls, in Sections 2 and 3, Township 30N, Range 7E, and Sections 34 and 35, Township 31N, Range 7E in Transportation Service Area (TSA) "B", outside the urban growth area (UGA).
- The subject property has frontage on Mountain Loop Highway.
- The proposed development will take access from Mountain Loop Highway.
- There are no existing structures on site.

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2. Notice of Decision Requirements for Concurrency Determination and Impact Fee Determination

The development is still under review and no concurrency decision has been made at this time. The applicant needs to justify the traffic distribution as shown in the traffic study dated December 3, 2007.

3. Road System Impact Fee [SCC 30.66B.310]

A development must mitigate its impact upon the future capacity of the road system by paying a road system impact fee reasonably related to the impacts of the development on arterial roads located in the same transportation service area as the development, at the rate identified in SCC 30.66B.330 for the type and location of the proposed development.

More information with respect to trip generation is needed. Justification for new trips as shown in the applicant's traffic study dated December 3, 2007 is needed. On page 5 in the project trip generation section, the applicant states that the subject project would generate 150 average weekday trips (AWDT) based on historical data for a similar development (the MXGP Motor Cross) in Monroe. The applicant references the Appendix on page 11. However, information provided in the appendix does not clearly show how the subject project would generate 150 average weekday trips (AWDT). Please clarify.

Based on the same data provided in the appendix on page 11, the applicant states on page 5 in the project trip generation section that the subject project would generate 20 PM PHT and 3 AM PHT. However, information provided in the appendix does not clearly show how the subject project would generate 20 PM PHT and 3 AM PHT. Please clarify.

4. Concurrency [SCC 30.66B.120]

The traffic study dated December 3, 2007 has been reviewed. The traffic study dated December 3, 2007 does not provide AM PHT data distribution. The subject development is proposed to be open to staff during the AM peak hour. The applicant states on page 5 of the traffic study that the only trips expected during the AM PHT are made by up to 3 employees. The applicant needs to show traffic distribution in the AM PHT and show whether it impacts any key intersections with 3 or more AM PHT. Key intersections 106 and 437 are located between the subject development and the City of Granite Falls.

A concurrency determination will be made once adequate average weekday trips (AWDT), AM PHT, PM PHT, and AM PHT traffic distribution are provided, and the traffic study review is completed.

5. Inadequate Road Condition (IRC) [SCC 30.66B.210]

The subject development proposal will not impact any IRC locations identified at this time within TSA B with three or more of its p.m. peak hour trips. Therefore, it is anticipated that mitigation will not be required with respect to inadequate road conditions and no restrictions to building permit issuance or certificate of occupancy/final inspection will be imposed under this section of Chapter 30.66B SCC.

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6. Frontage Improvements [SCC 30.66B.410]

All developments will be required to make frontage improvements along the parcel's frontage on any opened, constructed, and maintained public road. The required improvement shall be constructed in accordance with the EDDS, including correction of horizontal and vertical alignments, if applicable

As per DPW Rule 4222.020(1) full rural frontage improvements are required along the subject parcel's frontage on Mountain Loop Highway and shall consist of:

Asphalt concrete pavement consisting of 12 feet width from roadway centerline with an 8 foot paved shoulder.

The road, Mountain Loop Highway, on which the development's frontage improvements are required, is not in the impact fee cost basis (Appendix D of the Transportation Needs Report). Therefore credits towards the applicant's impact fee for any frontage improvements that can be used in the ultimate build-out of the road are not applicable.

Construction of frontage improvements is required prior to recording unless bonding of improvements is allowed by PDS, in which case construction is required prior to any occupancy of the development.

7. Access and Circulation [SCC 30.66B.420]

Access to the development is proposed via a new commercial driveway off of Mountain Loop Highway with a 40-foot radius return. Per the EDDS section 2-03C(2), the new driveway shall be 40 feet wide. The applicant is showing a 40-foot radius return at the new driveway entrance. This meets the EDDS standards.

Mountain Loop Highway is a two-lane major collector with a 45 MPH posted speed limit. The applicant's traffic study dated June 5, 2007 shows a speed study with an 85% percentile speed of 55.6 mph for eastbound traffic and 59.0 mph for westbound traffic. These speeds supercede the 55 mph speed (45 mph + 10 mph modifier) the applicant is using for the intersection sight distance and stopping sight distance for the subject development in this traffic study. These speeds (55.6 mph for eastbound traffic and 59.0 mph for westbound traffic) shall be used in the applicant's analysis for the intersection sight distance and stopping sight distance for the subject development.

Our field review with respect to stopping sight distance and intersection sight distance for vehicles looking to/from the east at the proposed access with Mountain loop highway does not agree with the applicant's traffic study. In the Traffic/Drainage memo dated August 9, 2007, the applicant was asked to provide a plan and profile of Mountain Loop Highway to show that stopping sight distance and intersection sight distance for vehicles looking to/from the east are adequate.

In the traffic study dated December 3, 2007, the applicant provided a diagram on figure 5 showing only intersection sight distance for vehicles looking to/from the east at the proposed access with Mountain loop highway. Figure 5 needs to have the following information per the

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EDDS standard drawing 3-140: label and identify the right of way line, the edge of pavement, and the name of the street (Mountain Loop Highway) being profiled shown on the drawing.

On page 4 of the traffic study dated December 4, 2007, the applicant is showing in table 1 (Sight Distance Summary) the existing intersection sight distance for vehicles looking to/from the east at the proposed access with Mountain loop highway to be 560 feet. This contradicts information provided in figure 5 that shows the line of sight to be 610 feet. The applicant states on page 6 that the available intersection site distance is 560 feet, which does not meet the EDDS and the 2004 AASHTO standards.

Per the speed study, the 85% percentile speed for westbound traffic is 59 mph. Per the 2004 AASHTO, Exhibit 9-55 (Design Intersection Sight Distances), the required intersection sight distance for a 59 mph speed and a time gap of 7.5 seconds for a passenger car is 651 feet.

The applicant needs to provide a stopping sight distance diagram for vehicles looking to/from the east at the proposed access with Mountain loop highway per the EDDS standard drawing 3-130.

The applicant states on page 6 that the existing stopping sight distance for vehicles looking to/from the east at the proposed access with Mountain loop highway is 490 feet, which does not meet the EDDS standards of 520 feet for a 3% downgrade.

Per the speed study, the 85% percentile speed for westbound traffic is 59 mph. Per the 2004 AASHTO, Exhibit 3-2 (Stopping Sight Distances on Grade), the required stopping sight distance for a 59 mph speed and a 3% downgrade is 582 feet.

The applicant also states on page 6 that paving the site access will raise the driver eye height slightly and improve the visibility. This needs to be shown on the plans or in an exhibit.

Stopping sight distance and intersection sight distance for vehicles looking to/from the west at the proposed access with Mountain loop highway meets the EDDS standards.

In addition to the issues identified above, a revised traffic study needs to provide and/or address the following:

- a) Address significant safety impacts associated with heavy trucks entering and leaving the subject development during the construction phase.
- b) Provide analysis for whether or not a center lane and or acceleration lane on Mountain Loop Highway is required at the proposed access to the subject development to determine whether vehicles entering or exiting the site will need an eastbound left turn lane into the subject development, and or a westbound acceleration lane. If it is determined that an eastbound left turn lane and or a westbound acceleration lane are needed, the applicant shall include in the site plans and construction plans a design for an eastbound left turn lane and or a westbound acceleration lane to accommodate vehicles entering or exiting the site.

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- c) Provide analysis showing the impacts with respect to safety on Mountain Loop Highway Bridge no. 102 with heavy trucks going over the 2-lane bridge on their way to the subject development, and with the addition of 150 average weekday trips (AWDT). Private Citizens have raised comments and concerns about impacts generated by the subject development to this bridge.

Based on the above, the proposed access is not acceptable to the DPW.

8. Right-of-Way Requirements [SCC 30.66B.510, SCC 30.66B.520]

Mountain Loop Highway is designated as a major collector arterial on the County's Arterial Circulation Map. This requires a right-of-way width of 40 feet on each side of the right-of-way centerline. 30 feet of right-of-way presently exist on the development's side of the right-of-way. Therefore, 10 feet of additional right-of-way is required to be deeded. This is not adequately shown on the site plan. The additional right-of-way, parallel and adjacent to the right-of-way centerline of Mountain Loop Highway shall be deeded to the County along the development's frontage such that 40 feet of right-of-way exists from centerline of the Mountain Loop Highway right-of-way.

Mountain Loop Highway is not in the impact fee cost basis (Appendix D of the Transportation Needs Report); therefore credit towards the applicant's impact fee for the right-of-way deeded that is more than 30 feet from centerline is not applicable.

9. State Highway Impacts [SCC 30.66B.710]

This development is subject to SEPA and thus is subject to Interlocal Agreement (ILA) with the Washington State Department of Transportation (WSDOT)/County effective December 21, 1997, and as amended.

The applicant chose voluntary negotiated payment in lieu of construction to mitigate their impact to the state highway system. The applicant chose to pay towards the following four impacted projects:

The first project is SR 9 at 60th Street NE (ID# DOT-37) and has a per ADT fee of \$30.93. This project would be impacted by 6 of the developments ADT. The respective mitigation fee for this project is $6 \text{ ADT} \times \$30.93/\text{ADT} = \185.58

The second project is SR 92 at 113th Avenue NE (ID# DOT-33) and has a per ADT fee of \$30.10. This project would be impacted by 52 of the developments ADT. The respective mitigation fee for this project is $52 \text{ ADT} \times \$30.10/\text{ADT} = \2033.20

The third project is SR 92 at Callow/Grade Road (ID# DOT-31) and has a per ADT fee of \$42.67. This project would be impacted by 52 of the developments ADT. The respective mitigation fee for this project is $52 \text{ ADT} \times \$42.67/\text{ADT} = \$2,218.84$

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The fourth project is SR 9 - 56th SE and 42nd NE Signal & Channelization (ID# DOT-09) and has a per ADT fee of \$9.54. This project would be impacted by 8 of the developments ADT. The respective mitigation fee for this project is $\$9.54 \times \$30.93/\text{ADT} = \$295.07$

WSDOT was provided notice of application for this project and an opportunity to comment. Comments from WSDOT dated June 28, 2007 have been received by email on June 28, 2007. WSDOT does agree to the mitigation measures proposed by the applicant. The County has reviewed the WSDOT requested mitigation and written proposal for mitigation submitted by the applicant and has determined that the proposed mitigation offer is subject to change based on County review of the applicant's traffic study. If the County determines that the proposed mitigation offers are subject to change, the applicant needs to submit a new offer to the WSDOT.

10. Other Streets and Roads [SCC 30.66B.720]

Mitigation requirements for impacts on streets inside cities and roads in other Counties will be established consistent with the terms of interlocal agreements between the County and the other jurisdictions. The proposed development is subject to SEPA and thus is subject to interlocal agreements for impacts on City streets and is effected by the interlocal agreement (ILA) with the City of Granite Falls.

Snohomish County has an ILA with the City of Granite Falls and this development is within the influence area that requires traffic mitigation be considered for the City. The development is located within the CO-GF-1 mitigation sub area, 90% of the development trips will pass through the City of Granite Falls. Per applicant's traffic study dated June 5, 2007, the applicant submitted a traffic mitigation offer to the City of Granite Falls as follows:

$$(\$2,500/\text{SFR} \times 158 \text{ PCE's} \times 0.90) / (9.57/\text{ADT}) = \$37,147.$$

The City of Granite Falls was provided notice of application for this project and an opportunity to comment. Comments from the City dated August 9, 2007 have been received by email on August 9, 2007. The City of Granite Falls does agree to the mitigation offer proposed by the applicant. The County has reviewed the City of Granite Falls requested mitigation and written proposal for mitigation submitted by the applicant and has determined that the proposed mitigation offer is subject to change based on County review of the applicant's traffic study. If the County determines that the proposed mitigation offers are subject to change, the applicant needs to submit a new offer to the City of Granite Falls.

11. Transportation Demand Management (TDM) [SCC 30.66B.630]

SCC 30.66B.630 requires development inside the UGA to provide TDM measures. Since this development is outside of the UGA TDM measures are not required.

12. Transportation Plan Comprehensive Policy

The applicant needs to provide analysis to determine whether the project is in compliance with the following Transportation Plan Comprehensive Policy

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- Objective TR 1.C** Establish access and on-site circulation standards to maintain the safety and integrity of the arterial roadway system.
- TR Policies**
- 1.C.1 A countywide network of primary corridors shall be identified that provide for multi-modal transportation services between centers designated on the comprehensive plan.
 - 1.C.2 Adequate access to and circulation within all developments shall be maintained for emergency service and public transportation vehicles.
 - 1.C.3 Roadway standards shall be adopted that are compatible with other jurisdictions in Snohomish County.
 - 1.C.5 Roadway networks shall be designed with direct routing and connections to avoid concentrating the burden of traffic flow on a few roadways.
 - 1.C.6 Bus stops and bus pullouts and on-site circulation shall be located and designed to accommodate public transportation where potential rider ship warrants such improvements.
 - 1.C.7 Permanent cul-de-sacs, private access ways and private roads shall be approved only where road connectivity within and between adjacent neighborhoods has been established.
 - 1.C.8 Access to a single roadway shall be limited as determined necessary to protect public safety and minimize traffic conflicts and delay.
 - 1.C.9 Existing roadways shall be improved to meet adopted design standards in order to enhance the safety and mobility of pedestrians, transit users, bicyclists and motorized traffic as part of construction of frontage improvements by developments and by the county as funding allows within the county's capital improvement program.
 - 1.C.10 Developments taking access from existing roadways shall be required to make offsite improvements to improve them to at least minimum standards for vehicular access based upon such factors as the volume and other characteristics of existing and newly-generated traffic.
 - 1.C.11 Access and circulation provisions shall be pursued that reduce traffic congestion and lessen the need for arterial capacity improvements and shall include, but are not limited to: (a) allowing for more than one travel route to residences and/or businesses to facilitate emergency vehicle access and circulation, (b) allowing non-motorized access to schools, activity centers and neighborhoods along alternative travel routes, and (c) allowing

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automobile access to schools, activity centers and neighborhoods along alternative travel routes.

- 1.C.12 The county shall require that development make access and/or circulation provisions for arterials designated by the comprehensive plan and for needed local roadways to include, but not be limited to: (a) dedication of right-of-way, (b) reservation of right-of-way, (c) design for potential way of access, (d) recording of easements, (e) location of public or private roads, (f) design and construction of public or private roads (including stub-roads), and/or (g) improvements to existing roads.

Objective TR 1.D Regulate the design, location and public access of private access ways and roads that impact the public roadway.

TR policies 1.D.1 A private road or access way shall not be permitted where a public road is required to meet public road access and circulation standards.

1.D.2 When a public road is not required, as per TR 1.D.1, a private road or access way shall be permitted where:

- (a) a public benefit is evident that outweighs potential liabilities,
- (b) it is clearly established that the private road would not attract public use,
- (c) it would not obstruct or undermine the safety of any existing or planned public roadway, or become part of a public road, and
- (d) in lieu of a public road, construction of a private road would not land lock any existing or future parcel of land.

GOAL TR 4 Provide transportation services that enhance the health, safety, and welfare of Snohomish County citizens.

Objective TR 4.A Cooperate with WSDOT, the cities, and transit operating agencies to design facilities and provide for services that enhance the mobility of all citizens regardless of age, disability, or income.

TR Policies 4.A.1 Pedestrian facilities shall be encouraged that maintain access between public facilities and residential areas, especially where they serve a safety purpose.

4.A.2 Pedestrian facilities shall be encouraged that will also accommodate elderly persons and persons with disabilities.

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4.A.3 Safe and direct pedestrian and disabled access shall be designed to and from public rights-of-way, structures, and adjacent developments.

Objective TR 4.D Restrict direct vehicle access from public and private property onto designated principal and minor arterials to maintain and improve the integrity of traffic flow.

TR Policies 4.D.1 In order to promote public safety and operations efficiency, access to principal, minor and collector arterials shall be limited.

4.D.2 Vehicle access shall be limited to collector arterials and local roads as a condition of development whenever practicable.

4.D.3 Preparation and approval of vehicle access, pedestrian access, and circulation schemes shall be required for major public or private developments.

4.D.4 Adequate distance of driveways from intersections shall be required in order to promote safe and efficient flow of vehicular traffic.

4.D.5 Joint driveway access and internal site circulation shall be achieved wherever practical as a condition of new development for adjacent properties that have compatible land uses.

4.D.6 Driveways shall be located in a manner that provides adequate sight distance for all traffic movements and does not interfere with traffic operations at intersections.

4.D.7 On-site traffic circulation shall be designed in a way that allows safe and efficient storage and movement of driveway traffic.

4.D.8 Driveway and traffic flow restrictions shall be used to allow safe and efficient access for emergency vehicles when needed.

4.D.9 Vehicle access to state highways by land development shall be limited where necessary to maintain adopted WSDOT highway design standards.

Objective TR 4.E Provide and maintain transportation facilities that enhance the safety of motorized and no motorized transportation.

TR Policies 4.E.1 Design standards, improvements and right-of-way shall be provided that vary by functional class of roadway in order to ensure safe and efficient flow of traffic.

4.E.2 A high priority shall be given to improvements that enhance the safety of transportation facilities and services.

4.E.3 Pedestrian facilities shall be encouraged that maintain access between public facilities and residential areas especially where they serve a safety purpose.

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4.E.4 Roadway and other transportation facility standards shall be maintained which enhance the safety for all users of the transportation system.

4.E.5 Safety improvements needed on roads due to the impact of new land development shall be provided concurrent with development.

GOAL TR 5 Design transportation systems that are efficient in providing adopted levels of service.

Objective TR 6.A In cooperation with the cities, prepare consistent criteria and procedures to avoid or mitigate adverse environmental impacts of transportation systems according to guidance provided by the State Environmental Policy Act.

TR Policies 6.A.1 Transportation facilities shall be designed to include mitigation of adverse impacts on water and soil resource and drainage patterns.

6.A.2 Transportation systems, including circulation roadways and driveways, shall be located and designed to minimize the disruption of natural habitat, floodplains, wetlands, geologically hazardous areas, resource lands, and other elements of the environmentally sensitive areas. Where disruption cannot be avoided, designs shall minimize the disruption and impacts shall be mitigated.

6.A.3 Aesthetic and visual values shall be considered in the location and design of transportation facilities.

13. **Summary of Items That Needs to be addressed**

- 1) Justify trip distribution including average weekday trips (AWDT), AM PHT, PM PHT, and provide AM PHT traffic distribution to determine impacts if any to key intersections.
- 2) Address access and circulation.
- 3) A revised traffic study is needed.
- 4) Show the additional right-of-way to be deeded on Mountain Loop Highway such that 40 feet of right-of-way exists from centerline of the Mountain Loop Highway right-of-way.
- 5) Provide an analysis of how the subject development complies with all the relevant comprehensive plan transportation policies in section 12.

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Snohomish Health District/State Water and Septic System Considerations:

PDS has not received any additional information from the Snohomish Health District regarding your proposal. Septic design approval and water availability are key to proceeding with review and recommendations of approval.

Building Code/Structural Review:

Barrier Free Accessibility throughout separate phases of the proposal will be determined during construction review.

Other Information Required:

A cover letter that identifies the proposed change(s) cross referenced to the comments on this project is required. Be sure to include and identify any additional changes proposed as well. Please provide five (5) copies.

FURTHER PROJECT REVIEW

Please call the assigned Project Manager, to arrange for submittal of any requested information. The resubmittal package **must** contain all the information for the package to be accepted.

Please be sure to provide the following number of copies:

Site Plan sets	(4)
11X17" reduced sets	(5)
8.5X11" reduced sets	(5)
Landscape Plan sets	(4)
Grading/Drainage Plan sets	(4)
All Reports	(3)
Cover letter	(5)

Review of your proposal will continue upon the receipt of the above listed information. Concurrency, water and septic facility availability, and project compatibility issues of noise and activity screening are key issues that must be addressed with greater clarification prior to issuing a SEPA Decision and scheduling the necessary rezone and conditional use permit public hearing. We will assist in expediting a resubmittal and scheduling a final review cycle. At the conclusion of that review, you will be notified whether the project is ready for a SEPA Threshold Determination and scheduling for public hearing. If it's been determined that additional information is necessary, the Project Manager will notify you of those additional requirements.

e-mailed 7/14/08 sw

COMMITMENTS MADE (July 17, 2008 Meeting:

- 1.
- 2.
- 3.
- 4.



LAW OFFICES OF

HERMAN, RECOR, ARAKI, KAUFMAN,
SIMMERLY & JACKSON, PLLC



STEPHEN T. ARAKI, P.C.
M. GERALD HERMAN, P.S. INC.
ROBERT B. JACKSON
ROBERT C. KAUFMAN
STEVEN P. RECOR
PAUL E. SIMMERLY

2100-116TH AVENUE NORTHEAST
BELLEVUE, WASHINGTON 98004
FACSIMILE: (425) 451-1689
TELEPHONE: (425) 451-1400

SHEILA OSBORNE, ESCROW PARALEGAL
THOMAS O. MILLOTT, LPO

December 3, 2007

*ALSO ADMITTED IN NEW JERSEY

MEMORANDUM

TO: Erik Olson, Project Manager
Snohomish County PDS

RE: Granite Fall Motocross Park Proposal, File #07-101924 PS
Consistency Of Proposal With Growth Management Act;
Snohomish County Comprehensive Plan and General
Policy Plan

**Consistency with the Growth Management Act, Snohomish County
Comprehensive Plan and General Policy Plan (GPP)**

Granite Falls Motocross Park proposal for a commercial conditional use permit and rezone from F to F&R is consistent with the Growth Management act, Snohomish County Comprehensive Plan and General Policy Plan (GPP). *Motocross is a low intensity use*, the tracks are dirt tracks and can be easily flattened and turned back into forestry land. The rezone to F&R doesn't change the long term viability of the property for mineral extraction and commercial forest uses and there is significant mitigation by the preservation of 391 acres of commercial forest land as part of the proposal.

A. The development regulations adopted by this ordinance are consistent with the goals and requirements of GMA and the Snohomish County Comprehensive Plan including but not limited to:

1. Enhancing recreational opportunities and developing recreational facilities pursuant to the GMA planning goal codified at RCW 36.70A.020(9).
2. Maintaining and enhancing natural resource-based industries and encouraging the conservation of productive forest lands, while discouraging

PFN: 07 101924 000 00 LU Granite Fall Motorcross Park

File#: 07101924

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- incompatible uses, pursuant to the GMA planning goal codified at RCW 36.70A.020(8).
3. Encouraging economic development pursuant to the GMA planning goal codified at RCW 36.70A.020(5).
 4. The requirement to conserve designated forest lands pursuant to RCW 36.70A.060(1) and the administrative guidelines promulgated at chapters 365-190 WAC and 365-195 WAC.
- B. The development regulations adopted by this ordinance are consistent with and further the goals, objectives, and requirements of the Snohomish County Countywide Planning Policies (CPPs), including CPP RU-7, which encourages the reduction of conversion pressures on forest lands.
- C. The development regulations adopted by this ordinance are consistent with and further the goals, objectives, and requirements of the GPP, including:
1. Objective LU 8.C, which requires establishing regulations that encourage multiple use of forest lands for a variety of activities that are especially suited to forest lands because of physical and topographical characteristics, remoteness from populated areas, and the quality of the forest environment.
 2. LU Policy 8.C.1, which includes provides for recreation as a primary use of designated forest lands. LU 8.C.1 states: "Commercial forestry, tree farms, non-commercial mineral extraction, *low intensity recreation*, compatible ancillary uses, and other activities relying on forest land should be the primary uses of designated Commercial Forest land." (Emphasis added). This policy recognizes the potential for the location of low intensity recreation uses, such as Motocross, on commercial forest land. This policy has been implemented via the use of those zoning categories that are used as implementing zones for forest land including the Forestry (F) and F&R zones. The F&R zoning classification can be applied to any GPP land use designation when consistent with applicable policies.
- D. The proposal is consistent with the above state and local policies and regulations for the following reasons:
1. The proposed amendments will allow the potential use of commercial forest lands as defined by RCW 36.70A. The new provisions allow motocross racetracks to be located on forest lands only when Forestry and Recreation (F&R) zoning is obtained for a project site, and when a conditional use permit is also issued. The state GMA policies for conservation, protection, and management of resource lands are recognized in the county's General Policy Plan (GPP) where county goals, objectives and policies reflect the direction

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provided by the state GMA to conserve productive forest land and discourage incompatible uses. The policies applicable to the proposed amendments are contained in the Forest Lands component of the GPP in LU 8.C.

2. LU 8.C.1 states: "Commercial forestry, tree farms, non-commercial mineral extraction, low intensity recreation, compatible ancillary uses, and other activities relying on forest land should be the primary uses of designated Commercial Forest land." This policy recognizes the potential for the location of low intensity recreation uses on commercial forest land. This policy has been implemented via the use of those zoning categories that are used as implementing zones for forest land including the Forestry (F) and F&R zones. The F&R zoning classification can be applied to any GPP land use designation when consistent with applicable policies.

3. Lands designated Commercial Forest by the GPP Future Land Use map are predominately zoned Forestry (F). The intent of the Forestry zone includes protection and conservation of forest lands, and includes an acknowledgement that intensive recreation uses should not be allowed. The Forestry zone does currently however, allow the following uses, some as permitted uses (p), some as conditional uses (c): Stage I Utility Airport (c), Bed and Breakfast Inn (c), Equestrian Center (c), Excavation and Processing of Minerals (c), Government Structures and Facilities (c), Health and Social Service Facilities, Level II (c), Commercial Kennel (p), Park and Ride Lot (c), Sanitary Landfill (c), Shooting Range (c), Transit Center (c), and Ultralight Airpark (c). Most of the above noted uses are at least of the medium intensity range. Their allowance on forest lands substantiates the county's desire to allow a limited number of intensive uses that require, due to their character, a fairly remote location. The motocross racetrack use as proposed will fit closely with the intensity of some of the above listed and allowed uses.

4. The F&R zone, together with a conditional use permit, is proposed to be used to site a motocross racetrack on forest lands. The F&R zone is a "floating zone", which has not been designated to implement a particular GPP land use designation, but rather is applied to lands consistent with its intent (SCC 30.21.025) of providing for the development and use of forest land for the production of forest products, as well as, certain other compatible uses such as recreation. The F&R zone is often used for the campground, recreational vehicle park, and private off-road vehicle use area uses; since these uses are only allowed in the F&R zone. The F&R zone, as noted above, can be typically located in any GPP land use designation. The use of the F&R zone for a motocross racetrack is appropriate, and consistent with the intent of the F&R zone when used together with the siting criteria and development standards

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proposed for the use. The siting criteria will require substantial preservation of managed forest areas in on-site buffers. The proposed development regulations will restrict the use of the F&R zone for the motocross racetrack use to only the forest land GPP designation.

5. In addition, objective LU 8.D states: "Ensure that adjacent land uses do not interfere with commercial forest management activities." Even though no specific policy for this objective addresses the use proposed by the subject amendments, the intent of the objective is satisfied by requiring a substantial amount of commercial forest land to be retained and managed on the same property as the proposed motocross racetrack. The amendments require that the motocross racetrack use retain a minimum 1000 foot wide perimeter buffer area that will be subject to continued forest practices. When the maximum development activity is allowed (75 acres) on a site, approximately 260 acres of forest land buffer will also be required, or approximately 80 percent of the overall project site. This buffer is not considered to be a transition area, but rather will be an area where unrestricted normal forest practices will be required. Therefore, the motocross racetrack use will not conflict with the continued use of the abutting forest lands.

The above perimeter buffer requirements also diminish the intensity of the use by relegating the disturbed area of a site to no more than 20 percent of the total site area. In addition, the overall effect of the proposed motocross racetrack use on forestry land is further minimized by including siting criteria that requires a minimum separation between motocross racetracks of 15 miles when located on forest land. This provision effectively limits the total number of potential motocross racetracks that can be located on forest lands. Another siting standard that limits the use of forest land is a requirement that motocross racetrack sites be located within 4 miles of a UGA. This requirement limits the siting of racetracks to approximately 37 percent of the total amount of designated forest lands in the county. The proposal is within the requirements of both the minimum separation and percentage of total amount of designated forest land criteria.

6. The use of certain forest lands will not be allowed by the proposed use including: natural areas preserves, natural resource conservation areas, and old growth research areas. These areas are identified by the state DNR.

7. The nature of the proposed use necessitates a remote location where limited residential uses are anticipated. A motocross racetrack can be considered similar to a campground, RV park and ORV use area in its need to be remotely located.

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Based upon the above, it is respectfully submitted that the proposed amendments are consistent with applicable state and county policies governing the use of forest lands.

Very truly yours,
HERMAN, RECOR, ARAKI, KAUFMAN
SIMMERLY & JACKSON, PLLC



STEPHEN T. ARAKI

STA:lsv
cc: MXGP Racing