

Project Overview

Pacific Raceways is a 57 year old facility with a long history of drag, road and motocross racing events. The Washington State Department of Commerce has designated it a Project of Statewide Significance, and, as such, is entitled to expedited permit review.

The Project is an interim use authorized pursuant to King County Ordinance No. 2015-0437 which was passed by the King County Council in November of 2015. The Project consists of excavating 1,000,000 cubic yards of gravel and constructing up to 200,000 square feet of commercial/industrial space which may include the Pacific Innovation Center. The space will be distributed in five buildings ranging in size from 36,000 square feet to 40,000 square feet.

The Project will be located predominantly on a 40 acre site commonly referred to as Parking Lot C. There are no sensitive areas on the site and it is over 1/4 mile from any slope leading to Soosette Creek. Buildings and other site improvements including storm water management and septic drain fields necessitate the grading of the entire site. There may also be an approximate 5,000 square foot retail building that is built in the paddock area on what is now an impervious surface. That building will tie into existing septic and storm water systems.

The Project will be built in phases consistent with the demand for space in the buildings. It is anticipated that the excavation and construction of the buildings and other site improvements will be completed by 2022.

The proposed construction and its use will blend into the existing Pacific Raceways use. The construction will take place in an area that does not interfere with the existing use of Pacific Raceways. Cars will be able to gain access to all existing uses notwithstanding the construction activities. Upon the completion of the project, the facility will complement the existing operations at Pacific Raceways. The constructed space will provide space for garages to serve existing uses of the facility so they do not need to trailer their race cars to the track and the potential of the Pacific Innovation Center with prototype manufacturing and testing. Other uses at the facility will also complement and support track activities. Deliveries to the newly constructed facility will not interfere with existing uses at the track. There will be some loss of parking space for large events but not a significant amount.

The uses that will be located in the commercial/industrial development will be consistent with uses authorized by Ordinance No. 2015-0437, as will the retail use. The amount of gravel proposed to be excavated is consistent with the amounts of previous gravel excavations approved by King County for the property. The storm water management system will address both water quality and recharge, maintaining historic drainage conditions. The additional traffic generated by the Project will not have an adverse effect on levels of service on the road network. Pacific Raceways is a heavily used and developed site, and all proposed activities and development that comprise the Project

are consistent with past uses and impacts and are designed to maintain existing environmental conditions. The construction of garages for race cars should reduce the number of pick-ups with trailers entering Pacific Raceways.

Proposed mitigation measures negotiated with the neighbors to gain their support include a noise mitigation wall on the southeast corner of the Project and a camera/noise monitoring system to ensure adherence to Conditional Use Permit conditions and will document any violations of those conditions or applicable noise regulations. The mitigation measures negotiated with the neighbors should preclude any undesirable externalities for the neighborhood.

SUMMARY OF SEPA CHECKLIST

The primary elements of the environment that are of concern with the proposed Project are traffic, water, noise, light, and air quality. This Summary describes briefly the anticipated impacts of the Project and how each of the impacts of the Project on each of these elements of the environment are mitigated so there is not a probable significant environmental impact.

Traffic

Traffic will be generated during excavation of the Site for the Project and during the operation of the Project. The excavation traffic will consist of trucks entering the Site and leaving with the excavated material. On a typical day of excavation, 80 truck trips and 20 employee trips will be generated. Operation of the Project will generate at most, using ITE rates for Industrial Parks, 1,366 average weekday trips, 164 AM peak hour trips, and 170 PM peak hour trips. This trip generation for the facility is very conservative, and the actual trip generation is expected to be much lower as the proposed use is much less intensive, but the ITE Manual does not contain a trip generation rate for a projects like the one proposed. Regardless, the traffic impacts from the operation are not significant. The intersections affected by the Project's traffic will continue to operate at the same level of service as would occur if the Project were not built.

Groundwater

There are two potential groundwater impacts from the Project. The storm water that is being infiltrated into the ground, and the septic system effluent that will be released into the ground. Although potential impacts, neither is a likely significant impact. The storm water will go through water quality treatment consistent with King County Storm Water Manual requirements prior to infiltration, and the septic system will receive no waste that is stronger than residential strength so the effluent will meet King County Health Department standards.

Noise

Noise from the Project will be generated primarily by two activities: construction of the facility (including excavation and removal of material) and operation of the facility. The construction noise is exempt from noise standards, but the contractors will be directed to shut off large vehicles/equipment that are idling and construction activities, except for excavation and actual construction of the buildings, will be located on the western side of the Site as far as possible from the residential uses on 148th Avenue SE. Noise from general operations, although exempt during hours of operation (KCC 12.86.500.P), will be mitigated by lowering the Site relative to the receiving properties creating a noise attenuation wall at the southeast corner of the Site. There will be a real time monitoring system consisting of cameras and directional noise monitoring devices designed to pinpoint time and location of noise generation for compliance with permit operating hours and off hour noise restrictions.

Light

Lighting impacts will result primarily from operation of the Project once completed. These impacts will not be significant due to the following mitigation measures: Lighting will be controlled through fixture design so it is directed on-site; an earthen light attenuation wall will be constructed through excavation to block light from the view of neighbors on the east side of 148th Avenue SE; and a noise wall eight to twelve feet tall constructed on the Project Site along 148th Avenue SE will also block light from the view of neighbors on the east side of 148th Avenue SE.

Air Quality

Air quality impacts are expected to be minimal. There are exhaust emissions from construction equipment while excavating, hauling material offsite, and building the facility, and, once constructed, from vehicles visiting the facility and vehicles being tested at the Project. During construction, vehicles and equipment will be shut down rather than having them idle unattended. Once the Project is completed, vehicles visiting the Project will not produce significant amounts of air pollution relative to SR 18 or the Central Puget Sound area. Vehicles traveling to the Project must meet state standards for vehicle emissions in order to be licensed. Vehicles that are being worked on at the facility will generally not have their engines operating except for brief periods of engine testing.

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December 8, 2017

Mr. Ty Peterson
King County Department of Permitting
DPER Permitting
Mail Stop SNO-DP-0210
35030 SE Douglas St., Ste. 210
Snoqualmie, WA 98065

Re: Pacific Raceways

Dear Mr. Peterson:

Excavation is Necessary for Buildings and Site Improvements.

This letter responds to General Comment #6 in the Project Management Comments for PREA17-0128 dated July 10, 2017. The one million yards of gravel that is proposed to be excavated is necessary to construct the buildings and required site improvements connected with the buildings. Specifically, the buildings, the septic system, the storm water infiltration system, and the noise and fugitive light attenuator require the proposed excavation. The septic and storm water systems must be constructed at the same grade or lower than the buildings to avoid the requirement of pumps to move the liquids to an elevation higher than the floor level of the buildings.

In addition, the buildings, the septic system and storm water systems need to be built at the level they are going to be with the master plan included with Ordinance 17287. Otherwise it would be necessary to relocate the systems when the master plan is implemented.

The excavation is also critical to constructing the earth wall that will be created on the east side of the buildings. This wall is essentially a noise and fugitive light attenuator that will further reduce impacts to the single-family dwellings located on the east side of 148th Avenue SE. As such, it is a site improvement connected with the buildings.

Noise Mitigation

Noise modeling was completed using a state-of-the-art three-dimensional noise prediction model (CadnaA), and considered the effect of existing and excavated terrain, noise emitted from fully-open garage doors along the east-facing wall of the eastern-most proposed garage building, and received at property lines of homes on the east side of 148th Avenue SE (see Fig. 1 below). Note that for this assessment, noise emissions were based on measurements conducted of a garage with activity similar to what can be expected at the proposed facility (mainly pneumatic tools and engine revving). The model assessment assumed that all twelve (12) east-facing garage doors would be open and operating at the same time, continuously over an hour (an unlikely and overly-conservative operating scenario).

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The noise study prepared for the project assumes that in addition to the excavation, a noise wall will be constructed at the level of 148th Avenue SE. The noise wall will be eight to twelve feet tall with the final height determined through discussion with the neighbors on 148th Avenue SE. Tall noise walls have a visual impact on the neighbors, in addition to the noise mitigation, so there is a desire to optimize the height of the noise wall.

The noise study shows that with excavation and a noise wall, the proposed project will comply with applicable King County noise standards. The earth wall greatly enhances the noise-mitigating effect of the proposed noise wall, and ensures that noise emissions remain within applicable limits (KCC 12.86.500.P) without the need for a noise wall greater than 12 feet which could be a significant visual imposition to the nearby residences. Without the earth wall, a noise wall taller than 12 feet would be required to meet King County noise standards.

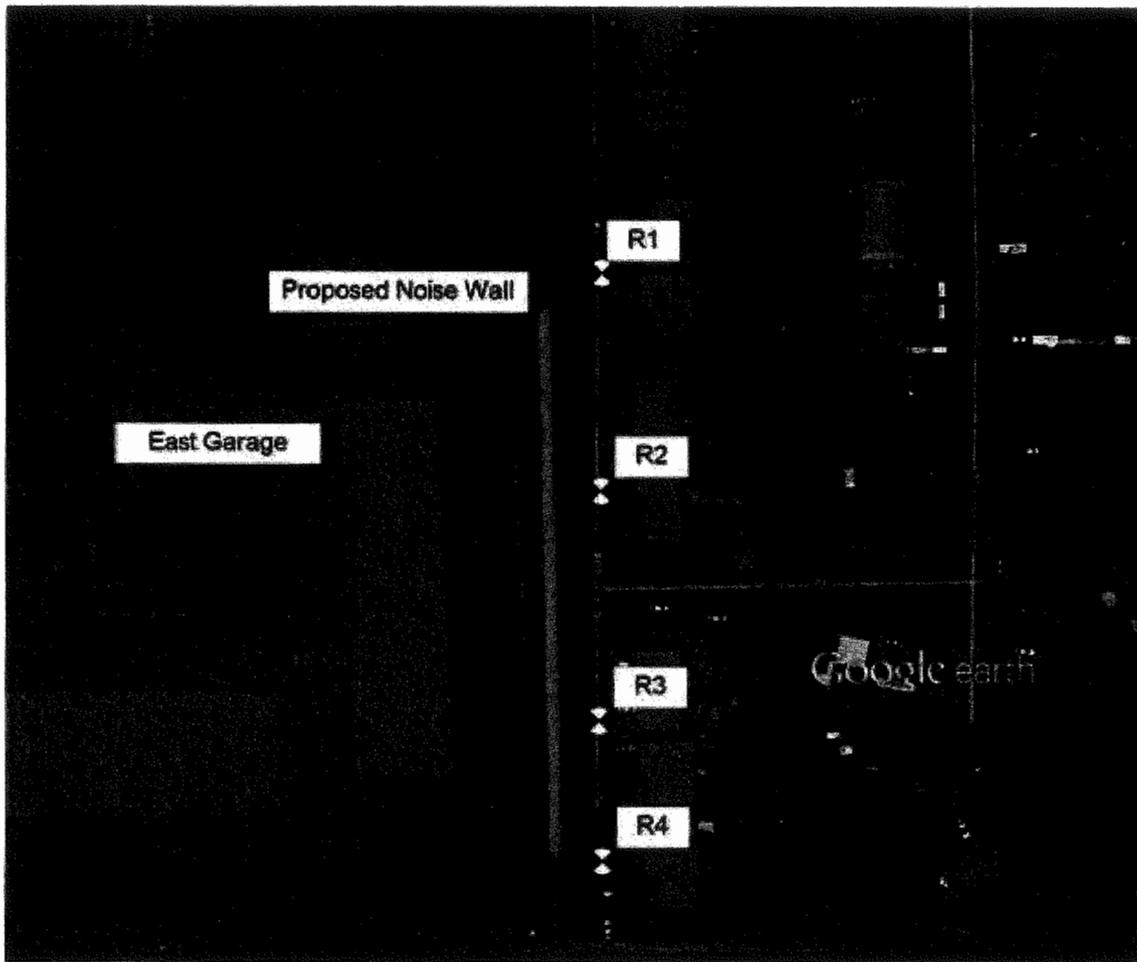


Figure 1. Noise Model: Receptor and Noise Wall Locations

Light and Glare Mitigation

Sources of light emissions associated with the garage buildings include outdoor security lighting, indoor overhead lighting that is visible through windows, and headlights from vehicles accessing the garages. Outdoor security lighting will be active under low light conditions and will be directional and downward, intended to illuminate paths and building entrances.

Indoor overhead lighting and vehicle headlights may be visible offsite while the garages are in use, however these are not expected to be major light sources rather they will only be noticeable as incidental light emitted through windows. These light sources are not expected to be visible at homes in the immediate vicinity of the nearest garage, along 148th Avenue SE, due to the proposed excavated buildings depth and top-of-slope noise wall. Note that garages would be available for use at any hour, but garage doors would only be allowed to remain open during daytime hours (not later than 10:00 pm, in accordance with timing restrictions required to adhere to the applicable King County noise code).

Sources of glare include reflective building surfaces, such as the vertical and slanted metal siding and ribbed seam metal roof panels. The potential for glare impacts from building surfaces depends on several factors, including the type of treatment selected for the building facade and roof materials, the location of the building relative to nearby receivers, the design shape, visibility, and age, as well as the density of intervening vegetation, the time of day, time of year, and the amount of cloud cover. At excavated depth, building roofs may be visible, at least partially, at some homes along 148th Avenue SE. However preliminary design features, including the lowered excavated area and noise wall, as well as intervening vegetated buffer, are expected to result in a partially obstructed view of only the top of slanted garage roofs, resulting in a low likelihood of glare impacts.

The proposed excavation would lower the elevation of the site by between 5 and 30 feet, depending on the location within the site. Once the garage buildings are constructed, the excavated site would be shielded by a natural barrier created by the change in topography relative to the surrounding terrain on which the houses on 148th Avenue SE are located. The proposed noise barrier along the eastern property boundary, in the vicinity of the eastern-most garage building is expected to be at least 8 feet tall and will sit at the top of the excavated slope.

It is anticipated that the effect of the change in topography, enhanced by the addition of the noise barrier, would block direct line of sight between light sources at the garage buildings and homes along 148th Avenue SE, and would result in significantly reduced potential for light and glare impacts. By comparison, should excavation not occur, a much taller noise wall would be required to achieve similar light and glare mitigation. Such a wall would not be cost-effective and would be visually imposing to nearby homes. Therefore the proposed excavation is expected to contribute to both light and glare mitigation, and would eliminate the need for a much taller barrier wall. Note that in addition to the benefit of the excavated area, a proposed 25-foot green-belt buffer, comprised of underbrush and medium density mature coniferous trees, would provide additional partial visual shielding and thus further reduce the potential for light or glare received offsite.

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December 8, 2017
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Conclusion

The provision in Section 2.U.2.a of Ordinance 2015-0437 does not contain a requirement to show that there is no alternative to the excavation of materials. The ordinance only requires that the excavation is necessary for construction of the buildings and any required site improvements. General Comment #6 is elevating the requirements of Section 2.U.2.a to a level that is inconsistent with the plain language of the ordinance by suggesting that excavation can occur only if there is no alternative design that would avoid excavation of gravel.

Sincerely,

A handwritten signature in cursive script that reads "Donald E. Marcy". The signature is written in black ink and is positioned above the printed name.

Donald E. Marcy

DEM/kgb

cc: Jason Fiorito
Dia Armenta