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December 3, 2007

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

- 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

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

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.

← Noise  
buffer

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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Mr. Erik Olson

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