

February 17, 2012

To: King County Council
cc: King County Executive Constantine

Subject: Ordinance 2011-0227— Pacific Raceways Expansion

Councilmembers,

King County has wisely adopted regulations to protect its rural areas from uncontrolled, large-scale development, sprawl, and desecration of its historic sites. We remain concerned with the subject Ordinance, since it effectively would declare an exception for Pacific Raceways. This is in clear violation of the letter, spirit, and intent of the Growth Management Act (GMA), King County Comprehensive Plan (KCCP), and Countywide Planning Policies (CPPs).

Unfortunately, this latest version of the Ordinance fails to resolve the central issue of concern to many Rural Area citizens. It would allow a major precedent to be set, thus providing future avenues for other interests to expand urban and industrial development into the Rural Area. Both the Greater Maple Valley Unincorporated Area Council (GMVUAC) and the Upper Bear Creek Unincorporated Area Council (UBCUAC) disagree with this push and the setting of such a dangerous precedent.

Creating a “demonstration project” to implement this major industrial expansion in the Rural Area is an unnecessary pretense, as any appropriate, legitimate improvements to this facility would normally be handled through the normal DDES permitting process (Special-Use Permit--SUP or Conditional-Use Permit--CUP).

The claim that such development would create jobs fails to look at the larger picture. Much of the economic success of King County is based on the fact that this is a pleasant place to live, and visit, with many scenic attractions. This attracts tourists who spend money, and skilled workers — many of whom have multiple employment options — who would prefer to live in rural King County than in the sprawling, overcrowded cities of other regions. Due consideration has also not been given to the inevitable decline in property values and corresponding decline in property tax revenues should this Ordinance be approved. We urge you to carefully look at the entire economic picture, including the “externalized” costs not borne by the developer, but rather by King County taxpayers.

The noise generated by Pacific Raceways is a matter of additional concern. Under current operating conditions, ever-escalating disturbances can be heard by residents out to Maple Valley and beyond. The expansion proposal, which includes an oval track, will serve only to exacerbate a situation made worse by the echo-chamber effect created by southeast King County's topography. While the expansion proposes to mitigate noise through placing new surface areas below grade, this ignores the impact from the additional clearing of vegetation and changes to grade that are increasing noise, particularly to the north, from the existing track surfaces at the site.

Chapter 3— Rural Legacy & Natural Resource Lands — of the 2012 KCCP Public Review Draft (PRD)--currently under consideration — states: “The GMA requires the protection of traditional rural activities and rural character.” Our Rural Area UACs continue to strongly support this vision as our recent extensive comments on the PRD detail. Throughout this chapter, the need to retain King County's Rural Legacy is often expressed; nowhere is this legacy more in evidence than in the area in the vicinity of Pacific Raceways, home to a number of rural businesses and a major King County-designated Agricultural Production District (APD), which includes some of the largest produce and vegetable producers in the Puget Sound Region.

Chapter 4 — Environment--of the PRD states: “The Environment Chapter reflects the overarching goal of the Countywide Planning Policies to restore and protect the quality of the Natural Environment in King County for future generations.” Given the proximity of Pacific Raceways to endangered wildlife habitat, critical salmon-spawning areas and the Soos Creek State Fish Hatchery, environmental degradation is an additional matter of concern, especially in this integral part of the Middle Green River Ecosystem. Rural Area citizens value their shared environment and follow applicable King County laws and property restrictions, so should large developers--no special exceptions.

Finally, Chapter 6 — Parks, Open Space, & Cultural Resources--of the PRD expresses support for cultural resources and historic preservation. The Rural Area in the vicinity of Pacific Raceways is among the most scenic and historic in all of King County, where a number of families, farming activities, cultural resources, and heritage properties have existed long before any portion of the racing facility was built. Our Rural Area UACs urge King County to enforce the 1984 Conditional-Use Permit and take a firm stand in denying any further expansion of Pacific Raceways.

For those industrial facilities that are grandfathered in and operate in the Rural Area, there are both general and very specific requirements placing strict limits on such facilities and uses. These requirements include buffering the industrial use from adjacent rural uses--stricter than those in the general code for industrial facilities in the urban area, and strictly confining any new permits or changes to the industrial use(s) in the Rural Area to within the pre-existing industrial zoned footprint. The Ordinance, as written, does not comply, or would allow DDES to not comply with these requirements.

Our Rural Area UACs join many voices in recognizing the peril of approving this Ordinance. In addition to concerned citizens

throughout King County, many local organizations, as well as a number of heritage, preservation, and cultural organizations, have expressed opposition as well. Please respect our collective concerns.

We request a careful and deliberate consideration of our concerns. Thank you.

GMVUAC Chair Steve Hiester
UBCUAC Chair Nancy Stafford