



August 20, 2024

Rebecca Maskin and Ivan Miller
King County Office of Performance, Strategy and Budget
401 Fifth Ave., Suite 810
Seattle, WA 98104

Re: Housing Target Reconciliation Request

Dear Rebecca and Ivan,

Thank you for visiting Carnation and discussing Carnation's housing target. The City of Carnation respectfully requests its housing target be reduced to 350 housing units based on the following new factors since the 799 target was set. Each item will be discussed further in this document.

- SR 203 becoming a bypass for HWY 405 substantially increasing traffic volume
- Lack of state funding being prioritized for a critical roundabout at NE Tolt Hill Road & SR 203
- Lack of a public transportation system; inability to get to any transit center
- Unreliable Tolt Dam Early Warning System resulting in the alarm system being turned off since March 2024
- Lack of comprehensive evacuation plan to evacuate all residents, school children and visitors in the event of a dam breach or other disaster
- 3rd party assessment of the Tolt Dam Early Warning System by Seattle Public Utilities currently being commissioned

Of important note is that the City of Carnation embraces affordable housing and housing by income level through our zoning, fee waivers and incentives; however, it is extremely difficult to attract partners for these projects without a public transportation system that will get residents to employment, medical care, or other services.

We propose a reevaluation in 5 years (2030) to examine infrastructure improvements, a comprehensive evacuation plan and public transportation offerings. Pending those critical improvements, we will happily reassess our housing target at that time.

Carnation Overview:

At slightly over one square mile in size, Carnation is compact. Geographic expansion of the City has been limited by its location at the confluence of the Tolt and Snoqualmie Rivers.

Development to the west and south is limited by these rivers and their associated areas of flood hazard. A steep hillside forms the eastern boundary of the City, and to the North, the floodplain of the Snoqualmie River widens considerably. State Route 203 (SR 203) provides highway access to Carnation from the rest of the Snoqualmie Valley, and the Snoqualmie Valley Trail bisects the City a few blocks to the east of SR 203. The current population of Carnation is estimated at 2,250.

GMPC/King County Questions

What changes is the city seeking, numerically for the target and in intent?

The City of Carnation respectfully requests a **reduction in our housing target to 350 housing units**. Once the below infrastructure improvements are achieved, then a reevaluation of the housing target number can be assessed.

What is the justification or rationale for the change sought?

This change is sought due to lack of transportation infrastructure which creates unsafe roadway conditions and impedes city-wide evacuation. Additionally, Carnation has no public transportation system outside of the Snoqualmie Valley.

According to the Washington State Department of Transportation in 2023, over 11,000 cars travel through Carnation via State Route 203 (SR 203) on a daily basis. This route has become a bypass of Highway 405 adding to an already highly traveled, highly congested **2-lane shoulder-less rural highway. SR 203 is the only route in and out of Carnation.**

To add to the congestion, the intersection of SR 203 and NE Tolt Hill Road is a dangerous bottleneck during morning and evening commute times and when there are events in Carnation.

City staff tracked a 6-month period in 2023. During that period, there were six serious traffic incidents, two of which led to over-turned cars hurling over the guard-rail. This intersection attempts to move people from a complete stop on NE Tolt Hill Road onto a State Route Highway. This stretch of highway quickly transitions from a 55 MPH highway to a 30 MPH highway, resulting in cars turning onto a highway with cars speeding at 30-55+ miles per hour. This results in frequent accidents and traffic incidents.

To add to the dangerous conditions, Carnation is in the inundation zone of a breach in the Tolt Dam and Reservoir, a 200-foot-high earth-filled dam. **In the event of dam failure, 2,250 residents, 1,400 school children and staff plus visitors will have approximately one-hour to evacuate Carnation.** It will be impossible to evacuate 3,650+ people via pedestrian path or vehicle, resulting in substantial loss of life. This does not even factor in the people that could be travelling through the valley on SR 203. With every housing unit Carnation adds, it creates more potential loss of life until there are infrastructure improvements. **The City of Carnation feels it is irresponsible to continue to add housing**

units/residents without a safe intersection and without the ability to evacuate residents and visitors in a timely manner.

Seattle City Light/Seattle Public Utilities (SPU) is currently undergoing a dam relicensing process with the Federal Energy Regulatory Commission (FERC) in Washington D.C. The relicensing process started earlier this year and concludes in 2029. As a stakeholder in this process, the City of Carnation has urged FERC to require SPU to do an evacuation study to evaluate how to safely evacuate the residents, students and visitors of Carnation in the event of dam failure. Until Carnation has an updated evacuation plan, we strongly feel it is not prudent to continue to add to our population, outside of what is already planned.

Moreover, our **audible warning system is currently turned off** until a 3rd party assessment is complete to look at reliability and accuracy of the system. Currently we do not have a date that the early warning system will be turned on and operational. This is troubling because unless you have a cell phone there is no way for people to be warned of a dam breach if they are not by a TV or standard AM/FM radio.

What alternatives or mitigation have been considered to accommodate the adopted target and avoid reconciliation?

In 2018 City of Carnation had a tentative development agreement with Mainvue Homes for Mainvue to fund a roundabout at the intersection of NE Tolt Hill Road and SR 203 and install left- and right-hand turn lanes into their proposed development. This would safely move traffic and avoid bottlenecks. The roundabout was designed and planned as a requirement by the City of Carnation for the Mainvue development, even though the roundabout is outside of Carnation city limits. Unfortunately, WSDOT said a roundabout and designated turn lanes weren't required in 2018. **Had this roundabout happened, at the expense of the developer, the City of Carnation would likely not be requesting this reconciliation in 2024.** This is frustrating because the City of Carnation saw the need for infrastructure even outside our jurisdiction and included it in a development agreement. We justified the roundabout as a requirement of the development agreement based on SEPA, and the impacts additional housing would have on a dangerous intersection.

Since 2018, Carnation has been fervently working with State, County and Tribal partners to urge lawmakers to fund a roundabout (traffic circle) at the intersection of NE Tolt Hill Road and SR 203.

A roundabout at this intersection would safely move traffic between NE Tolt Hill Road and SR 203 avoiding accidents and more safely evacuate residents and visitors in the event of a dam breach.

Please see the enclosed package which illustrates the most recent lobbying efforts on the part of the City of Carnation with the support of King County, Sno-Valley Regional Chamber of Commerce, Snoqualmie Valley Preservation Alliance, Carnation Chamber

of Commerce, Eastside Fire & Rescue, Snoqualmie Valley School District, Riverview School District, Mainvue Homes, Remlinger Farms, King County Sheriff's Office and City of Snoqualmie.

Note that the roundabout has still not been funded.

As the Countywide Planning Policies state:

“An effective transportation system is critical to equitably achieving the Regional Growth Strategy and ensuring that centers are functional and appealing to the residents and businesses they are designed to attract. The policies in this section reinforce the critical relationship between development patterns and transportation and they are intended to guide transportation investments from all levels of government to effectively support local, county, and regional plans to accommodate growth.”

“Goal Statement: A transportation system that is well-designed and managed to protect public investments, promote equitable access, provide mobility, promote public health and safety, and achieve optimum efficiency.”

Goal T-12 Prioritize funding transportation investments that support countywide growth targets and centers framework, and that enhance multimodal mobility and safety, equity, and climate change goals.

Goal T-29 Design roads, including retrofit projects, to accommodate a range of travel modes within the travel corridor in order to reduce injuries and fatalities, contribute to achieving the state goal of zero deaths and serious injuries, and encourage physical activity.

Given transportation funding hasn't been prioritized that supports a growth plan for Carnation, the City does not feel it can safely commit to the housing target of 799 homes by 2040.

As Carnation's 2015 and 2024 Comprehensive Plan Transportation elements state:

Policy T1.4 The City will allow new development only when and where all transportation facilities are adequate at the time of development, or unless a financial commitment is in place to complete the necessary improvements or strategies which will accommodate the impacts within six years; and only when and where such development can be adequately served by essential transportation facilities without reducing the adopted level of service elsewhere.

Policy T1.5 The City will actively solicit action by the State and King County to program and construct those improvements to State and County arterial systems which may be needed to maintain the level of service standards adopted in Carnation. The City will advocate for support from regional and state partners for infrastructure improvements on SR203, particularly at SR203 and Tolt Hill Road and SR203 and Stillwater.

The City of Carnation currently has 230 housing units in development. The City of Carnation can commit to 350 housing units (which includes the 230 in development) which is consistent with our 2023 Housing Action Plan. Using our average home size of 2.77 people, this would add another 970 residents to the City's population.

In keeping with the Countywide Planning Policies and Carnation's policy statements, the City of Carnation needs adequate transportation facilities for further development.

We propose a reevaluation in 5 years to discern if there have been vital infrastructure improvements for the City of Carnation. Until that point, we respectfully request our housing target be decreased from 799 housing units to 350 housing units.

What unanticipated local circumstances have shifted since the targets were adopted?

Please see the above and below explanations which include:

- SR 203 becoming a bypass for HWY 405 as a result of congestion on HWY 405 resulting in increased travel through Carnation.
- WSDOT not supporting the City of Carnation with a developer funded roundabout and left and right turn lanes in 2018.
- Lack of state funding being prioritized for a critical roundabout at NE Tolt Hill Road & SR 203.
- Carnation is currently experiencing its largest housing boom ever with 230 housing units in current development.
- Due to repeated false alarms and system unreliability, the Tolt Dam Early Warning System has been deactivated since March 2024. These false alarms have caused significant emotional distress among residents and have eroded the public's trust in the system's ability to provide timely and accurate warnings. Frequent weekly testing and a high rate of false alarms have led to alarm fatigue, diminishing the public's response to potential emergencies.
- SPU has commissioned a third-party assessment of the Tolt Dam Early Warning System to determine recommendations and steps forward for the audible warning system. Results are not due back until an undisclosed time in 2025.
- The City of Carnation has requested an evacuation study be commissioned by SPU to find a safe and reliable evacuation plan for all residents, school children, employees and visitors. A decision on this plan will not be made until 2029 when the relicensing is due.

How does this request align with the Regional Growth Strategy?

“The Regional Growth Strategy is a way to distribute growth coming to the region—a forecast of 5.8 million people and 3.4 million jobs by the year 2050. The strategy focuses growth near high-capacity transit and inside the designated urban growth area.”

“VISION 2050 calls for cities and counties to support building more diverse housing types, especially near transit, services, and jobs. The plan also calls for more housing that’s affordable to low- and very low-income households.”

“The region’s residents have made unprecedented investments in transit over the last decade. VISION 2050 helps leverage those investments to help future growth go into more compact, walkable, transit-served neighborhoods. The plan sets an ambitious goal of attracting 65% of population growth to the region’s centers and near high-capacity transit.”

Public Transportation in Carnation

Metro no longer services the City of Carnation. We have no high-capacity transit. We have no public transportation system. Residents have no ability to get to jobs, medical care or services outside of Snoqualmie Valley via public transportation.

Metro does contract with a local non-profit, Snoqualmie Valley Transportation (SVT), to provide transportation within Snoqualmie Valley. However, there is no service outside the Snoqualmie Valley and no service to a transit center.

The City of Carnation has been actively engaged in regional Metro committees, mobility coalitions and numerous meetings to bring connection to regional transit centers using SVT.

Between 2009-2016, Carnation actively worked with King County and Habitat for Humanity to develop a 14-unit affordable housing condominium project at NE 45th St and 326th Ave NE in Carnation. **This project was never realized, in large part because of the lack of public transportation.** The land was later sold to a developer who developed large single-family homes.

The City of Carnation requests our housing target be modified until there is a public transportation system to get residents to a transit center, jobs and medical care.

(Note: Carnation has no medical care in the city)

Diverse Housing Types

The City of Carnation is currently developing more diverse housing types. Carnation has historically been a predominantly single-family home community. In recent years a new apartment complex was developed with 24 units, and we are presently in development for our first townhomes and duplexes. There is also interest from a developer for condominium development.

A 15-unit senior affordable housing community is opening in September 2024 in Carnation. This is our first affordable housing community. Qualifications for this community include:

- 8 units will serve seniors (62+) with incomes at or below 30% of the area median income (AMI).
- 7 units will serve seniors (62+) at or below 50% AMI.
- 5 of the total units are reserved for low-income veterans (62+) in any category (3 are required to be used by Veterans, 2 may be used by eligible seniors if veterans are not found).

Carnation is also working hard to secure grants for complete street projects to improve infrastructure and accessibility within the City. Recent projects include a stormwater and sidewalk project on McKinley Avenue, an area with 12 more affordable apartments, new sidewalks with ADA ramps in front of Tolt Middle School and a stormwater and street project on W Bird Street. Our goal is to improve infrastructure and mobility within the City of Carnation.

Please see more information in the section on housing by income level.

What are the perspectives of utility and service providers on this request?

The City of Carnation has its own sewer, water and stormwater utilities. These utilities were built to accommodate a higher capacity. However, the sewer system was installed in 2008. The sewer holding tank has a lifespan of approximately 20 years. Its lifespan is quickly approaching, and the City will need to invest \$1.5+ million to install a new holding tank and/or a redundant tank in order to reline the existing tank. (Technical report indicating that the lining of the tank is starting to be compromised available upon request).

The City will need to secure loans/funding in order to fund this necessary infrastructure improvement.

The more homes/service connections that are added to the system, the more quickly the service life of the tank will be reduced.

The City of Carnation needs time to research the construction and funding of this project.

The county needs to accommodate housing need (by income level) based on the state’s adopted standards. What is your proposal to accommodate housing need related to this request?

The City of Carnation strives to accommodate housing needs by all income levels.

Carnation’s current development projects include townhomes and duplexes to provide a diversity of housing types and to accommodate an array of income levels.

Carnation’s R12 zoning, which is proposed for part of its UGA, requires a mixture of three different housing types and no single housing type may occupy more than 60% of the total dwelling units in a subdivision. Housing types include single family detached, cottage housing, townhome, duplex, multifamily and assisted living.

Cottage housing is permitted in all residential zones in order to promote housing affordability and greater choice by encouraging smaller and more diverse home sizes in accordance with the Carnation Comprehensive Plan. Cottages are exempt from minimum lot area. Due to the smaller relative size of cottage units, each cottage may be counted as one-half a dwelling unit for the purpose of calculating density.

The City provides exemptions of school, transportation and park impact fees for low-income housing development.

Additionally, the City recently passed a resolution to waive school impact fees for ADUs. Transportation and park impact fees are also significantly reduced for ADUs.

The City of Carnation municipal code encourages the construction and maintenance of affordable housing and affordable senior housing through the use of residential density incentives. It also establishes an efficient, streamlined review process that will allow evaluation of proposed density increases simultaneously with an applicant's underlying development proposal. Density incentives are achieved by allowing a reduction of the minimum lot size or required minimum square footage per dwelling unit.

The use of density incentives is permitted in all single-family zones.

Permanent supportive housing is permitted in R12 and R24 residential zones, as well as the Commercial Business District and Mixed Use zones to allow more options for supportive housing.

Nearing completion is the Sno Valley Senior Housing Community which features 15 affordable housing units for seniors. Carnation supported this project through grant funding, support letters, waiver of transportation and park impact fees and density incentives.

Carnation would love to support more affordable housing projects but needs developers, non-profits and state partners to develop the projects. Additionally, a public transportation system is needed to support the entire community, but especially low-income housing residents. A reliable dam failure alert system that doesn't rely on cell phone ownership is also an important safety feature for affordable housing development.

In conclusion, City of Carnation respectfully requests a reduction in our housing target to 350 housing units. We propose a reevaluation in 5 years (2030) to examine infrastructure improvements, a comprehensive evacuation plan and public transportation offerings. Depending on those critical improvements, we can readdress the housing target at that time.

Please share this letter with the GMPC, PSRC and King County Department of Community and Human Services.

Thank you for your time and consideration.

Sincerely,

Jim Ribail
Mayor

Adair Hawkins
Deputy Mayor

Brodie Nelson
Councilmember

Ryan Burrell
Councilmember

Jessica Merizan
Councilmember

DRAFT