



**Carnation Urban Growth Area Exchange
Area Zoning and Land Use Study
2024 King County Comprehensive Plan
December 2023**

I. Overview

The 2024 Comprehensive Plan Update Scope of Work¹ directs analysis of potential exchange of Urban Growth Area (UGA) lands in the City of Carnation's Potential Annexation Area for adjacent rural lands, as follows:

Carnation Swap: Review land use designations and implementing zoning on parcels 2125079009, 2125079002, and the surrounding area; to consider ways to permanently protect this area from urban development, and a potential swap of non-urban land to replace the area permanently protected from urban development.

II. Land Use Information

A. Parcel and Vicinity Information

Parcel Number	Property Name/ Ownership	Land Use Designation	Zoning Classification	Development Conditions	Acreage	Present Use
2125079009	Roger Thorson/ Carnation Tree Farm	rx	UR	None	14.84	Single family home
2125079002	Roger Thorson/ Carnation Tree Farm	rx	UR	None	8.73	Vacant

The subject parcels are urban unincorporated areas within the City of Carnation's Potential Annexation Area. The properties total 23.57 acres in size and have a "rx" (UGA for Cities in Rural Area) land use designation and a UR (Urban Reserve) land use classification. There are no property specific zoning conditions on the properties.

¹ Motion 16142 [\[LINK\]](#)

According to the King County Assessor, parcel 2125079009 has a historic single-detached home on it, built in 1907.² The building is home to the historic collection of the Tolt Historical Society.³ Other buildings are also on the site, including a detached garage, several sheds, and a gazebo. Parcel 2125079002 is shown as having a "vacant" present use; however property photos show a three-story barn on the site.⁴ The site has been designated as King County, state, and national historic landmarks⁵ The site is also enrolled in the Farm and Agricultural and Public Benefit Rating System (PBRs) current use taxation programs.⁶

Properties to the north and east are within the City of Carnation. To the north, there are single-detached and multifamily homes, as well as industrial and warehouse uses. Across State Route (SR) 203 to the east, there is the Tolt Middle School, Valley Memorial Park, and warehouse and single-detached residential uses.

Properties to the south and west are outside of the UGA and zoned RA-10 (Rural Area, one dwelling unit per 10 acres). These properties are part of King County's Tolt MacDonald Park, which includes a campground, ballfields, hiking and biking trails, and natural areas in a restored floodplain that supports fish habitat.⁷ There also are two small UR-zoned properties in the southwest corner of parcel 2125079009, each approximately a half of an acre in size and developed with single-detached homes. Should the subject properties be removed from the UGA, these two properties would likely remain urban for potential future annexation into the City of Carnation.

The Carnation Comprehensive Plan Future Land Use Map⁸ has identified the subject parcels as "low intensity commercial." The two parcels in the southwest corner are identified as "medium intensity commercial."

B. Infrastructure and Services

Access to the parcels occurs from both SR 203 and NE 40th St, with a private road connecting the two. Parcel 2125079009 has a private septic system; parcel 2125079002 has no wastewater treatment services. There are several public parks close by, including Tolt MacDonald and Valley Memorial Park. The area is served a deviated fixed-route transit shuttle operated by Snoqualmie Valley Transit.

C. Environmental Constraints

Both properties have seismic hazard areas and are Category 2 Critical Aquifer Recharge Areas. The majority (78 percent) of parcel 2125079009 is in the 100-year floodplain, with a portion in the 500-year floodplain. A portion of parcel 2125079002 is in the FEMA floodway, with the majority of the remaining area (78 percent) is in the 100-year floodplain. There is also a stream present on a portion of parcel 2125079002 and near the southern border of parcel 2125079009. The majority (77.92 percent) of parcel 2125079009 has a residential shoreline designation. Almost all (98.9 percent) of parcel 2125079002 is in the shoreline jurisdiction, with 79.11 percent having a residential shoreline designation and 79.79 percent as conservancy shoreline.

² eReal Property; King County Department of Assessments for parcel 2125079009 [\[LINK\]](#)

³ Tolt Historical Society [\[LINK\]](#)

⁴ eReal Property; King County Department of Assessments for parcel 2125079002 [\[LINK\]](#)

⁵ History – Carnation Tree Farm [\[LINK\]](#); also known as "Hjertoos Farm"

⁶ King County Current Use Taxation Programs [\[LINK\]](#)

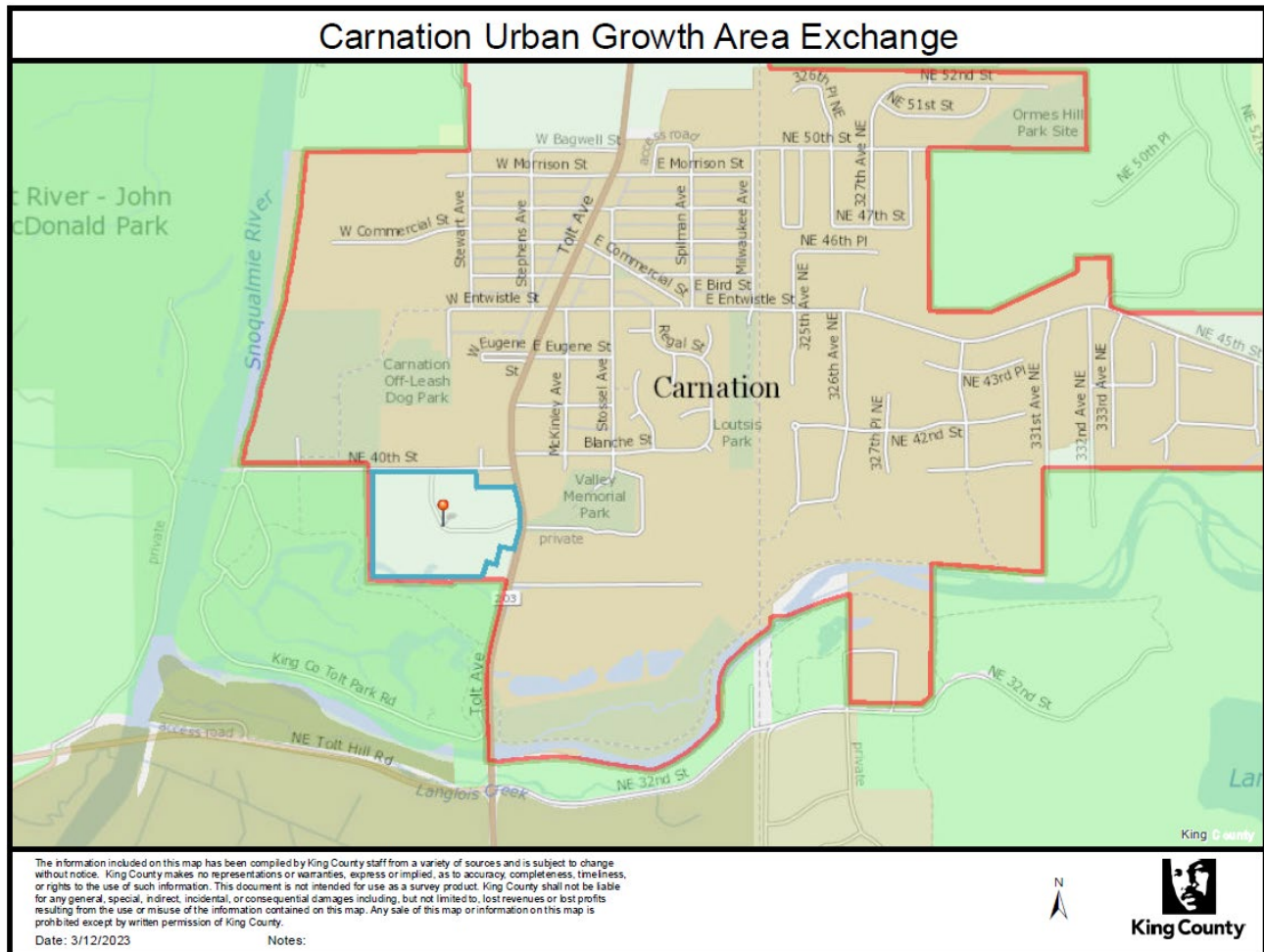
⁷ Tolt MacDonald Park & Campground in King County, Washington [\[LINK\]](#)

⁸ Carnation Comprehensive Plan, Land Use Element (2018), Figure 3-2, page LU-17 [\[LINK\]](#)

^{9,10,11} All of the subject properties are in the Wildland Urban Interface, with parcel 2125079009 being both interface and intermix, and parcel 2125079002 being all intermix.¹²

D. Maps and Photos

1. Vicinity Map¹³



⁹ eReal Property; King County Department of Assessments [\[LINK\]](#) [\[LINK\]](#)

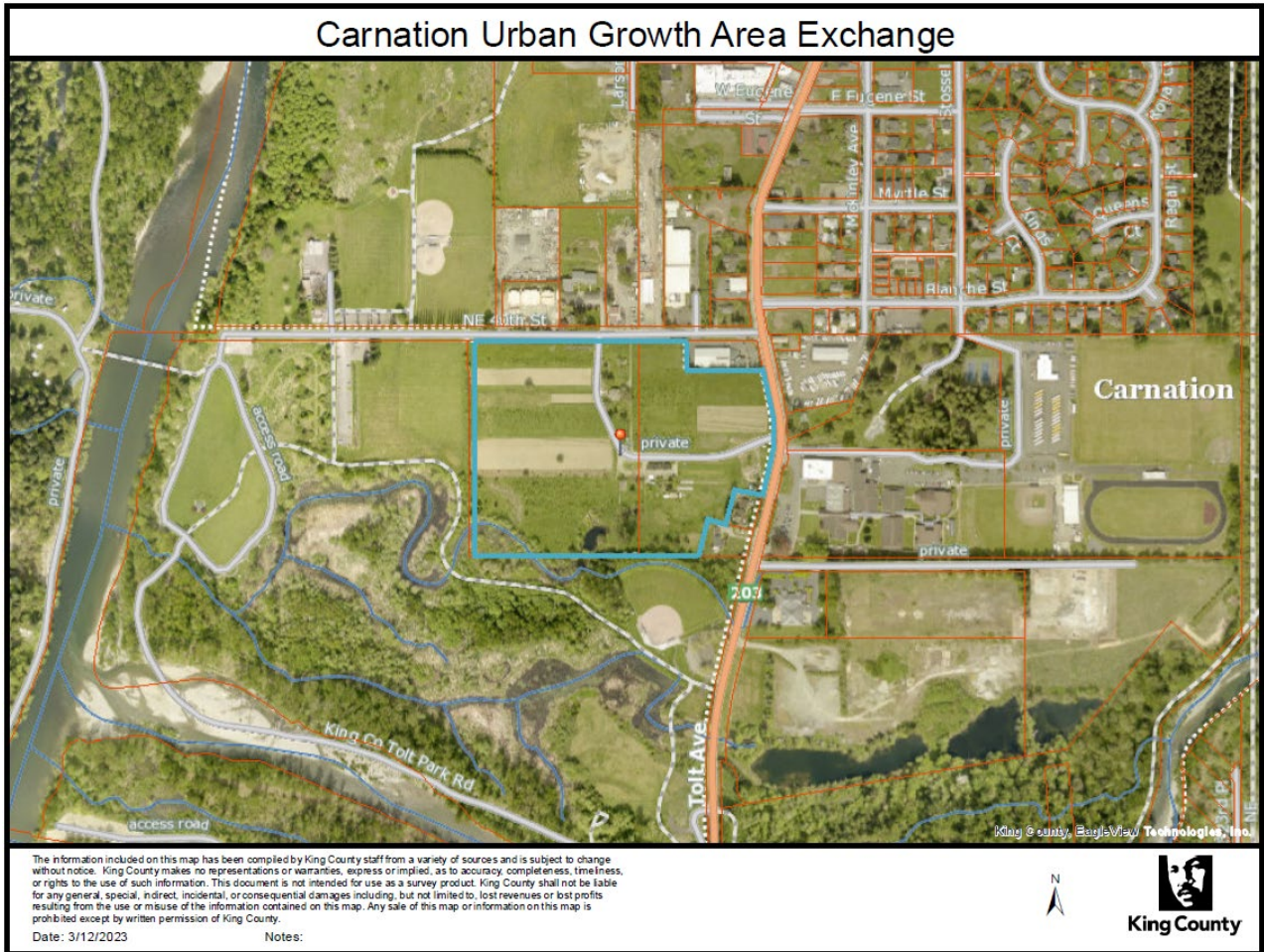
¹⁰ King County Districts and Development Conditions [\[LINK\]](#) [\[LINK\]](#)

¹¹ iMap [\[LINK\]](#)

¹² WA State's Wildland Urban Interface (arcgis.com) [\[LINK\]](#)

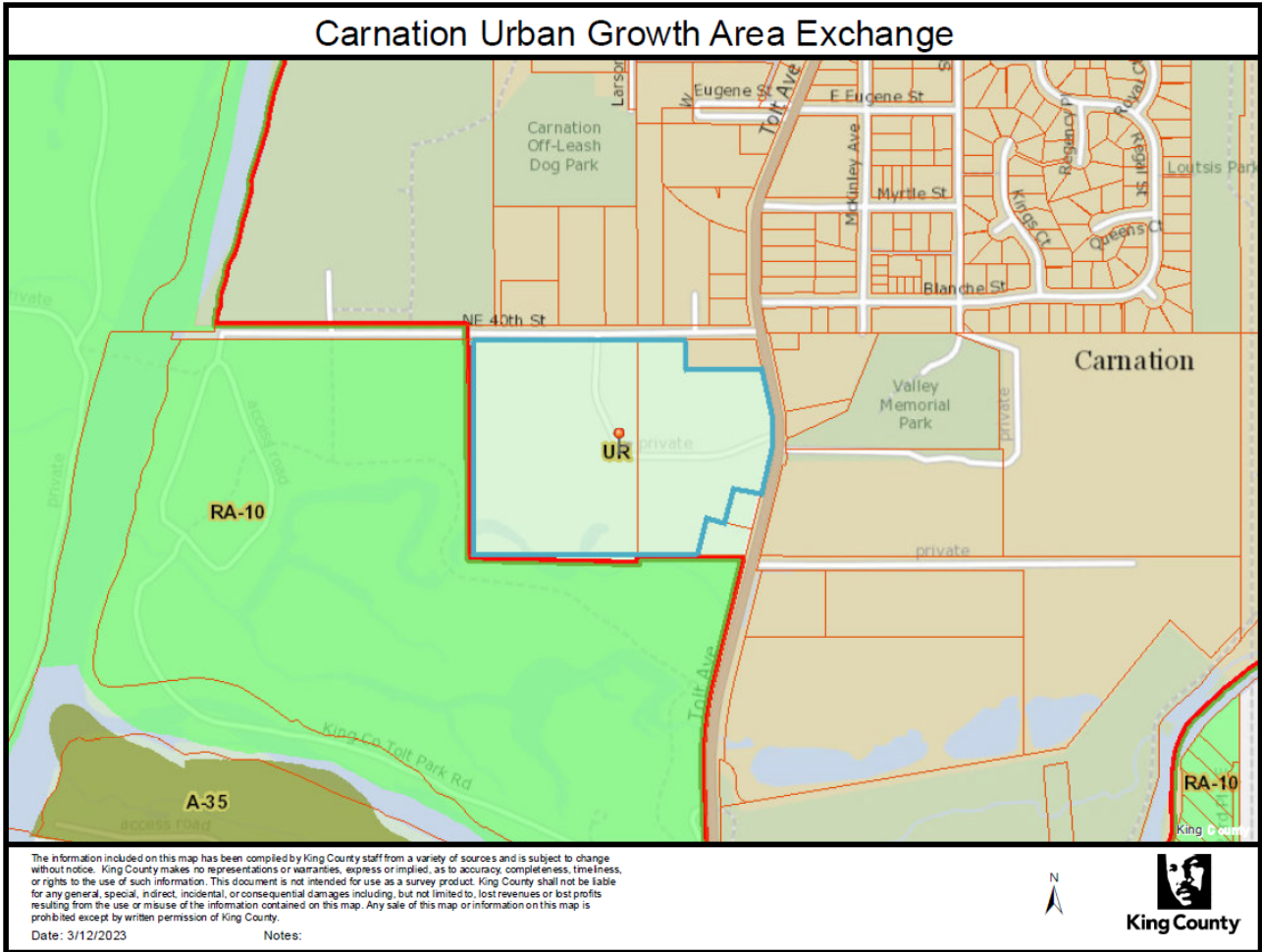
¹³ iMap

2. Aerial Site Map¹⁴



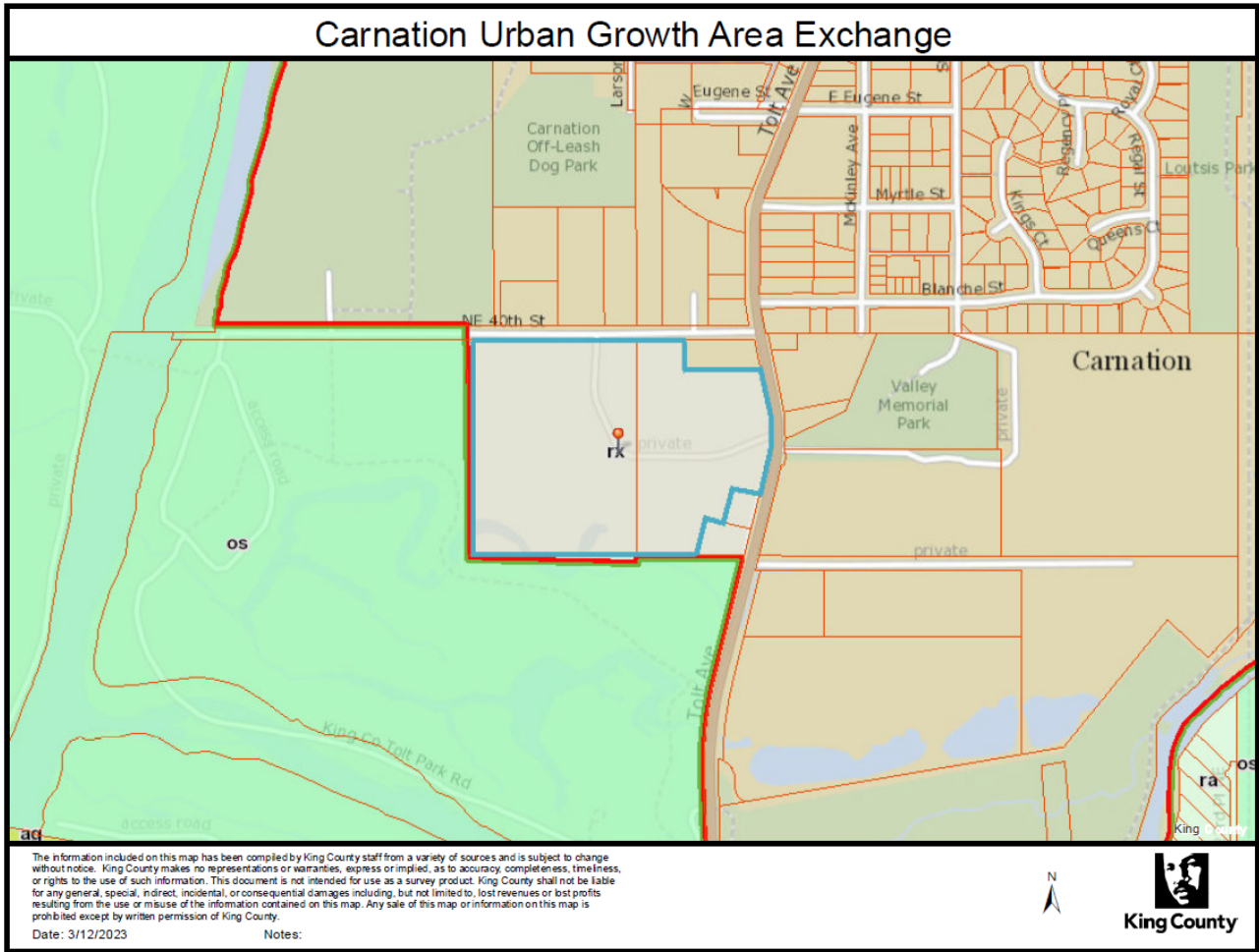
¹⁴ iMap

3. Zoning Map¹⁵



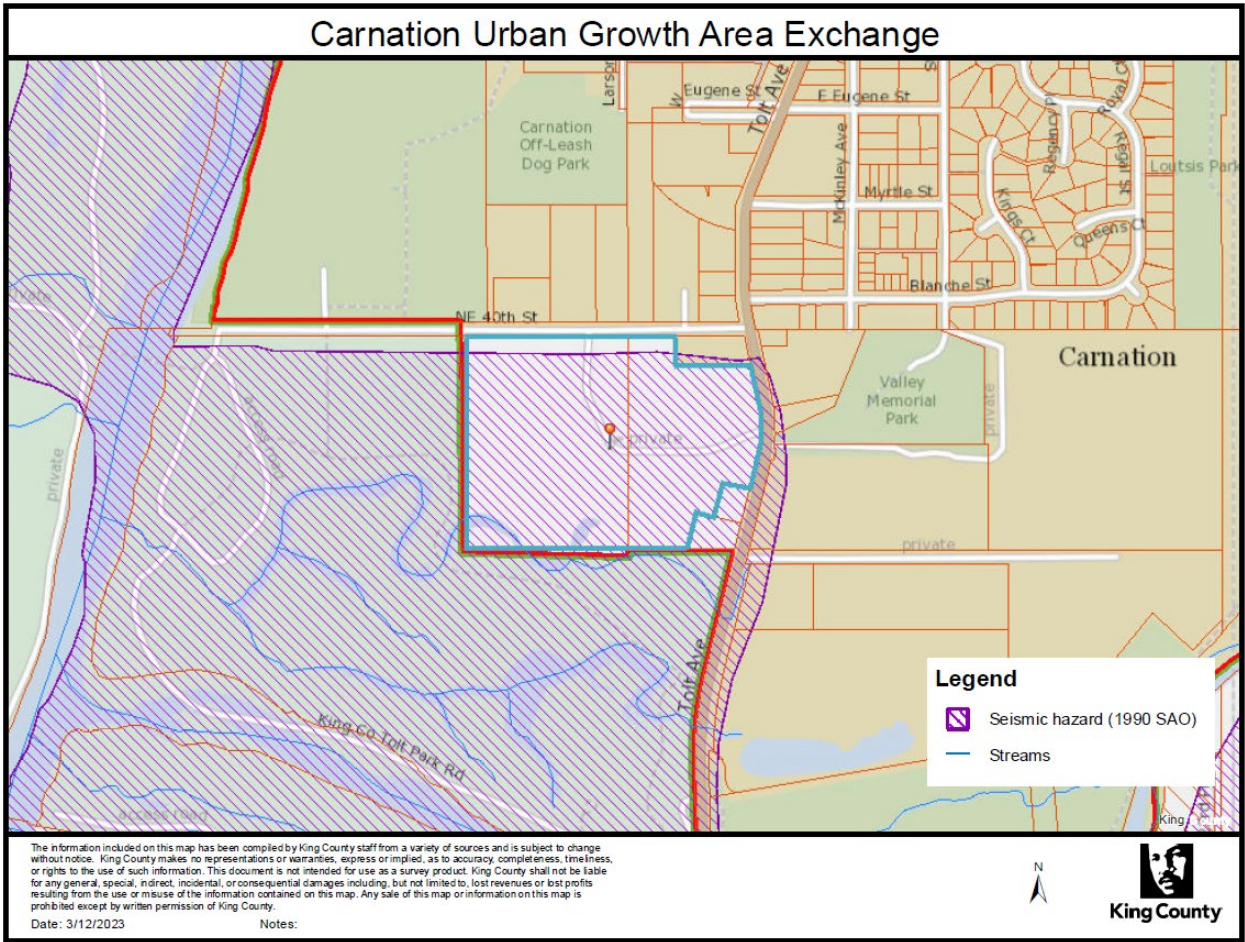
¹⁵ iMap

4. Land Use Map¹⁶



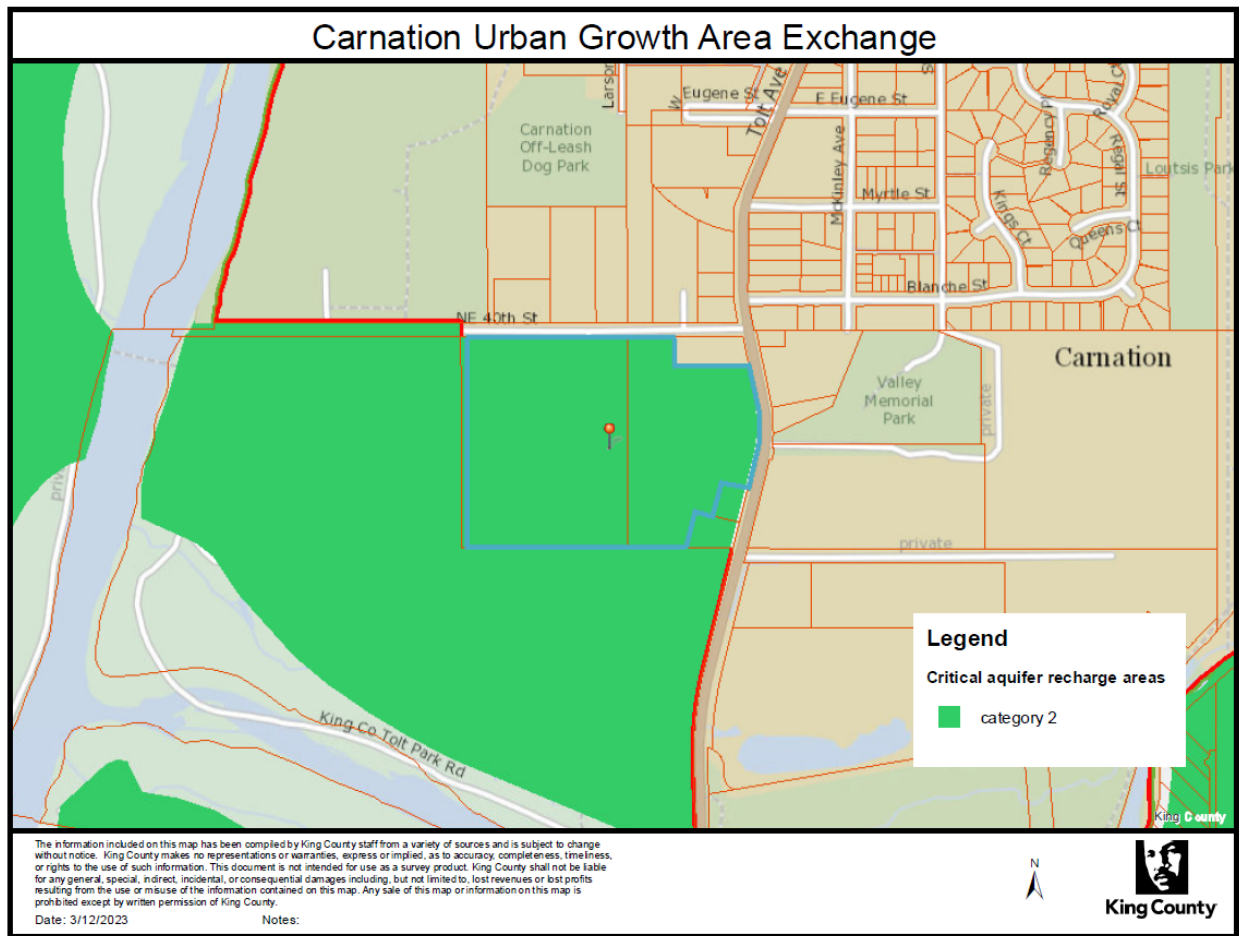
¹⁶ iMap

5. Environmentally Sensitive Areas Map¹⁷



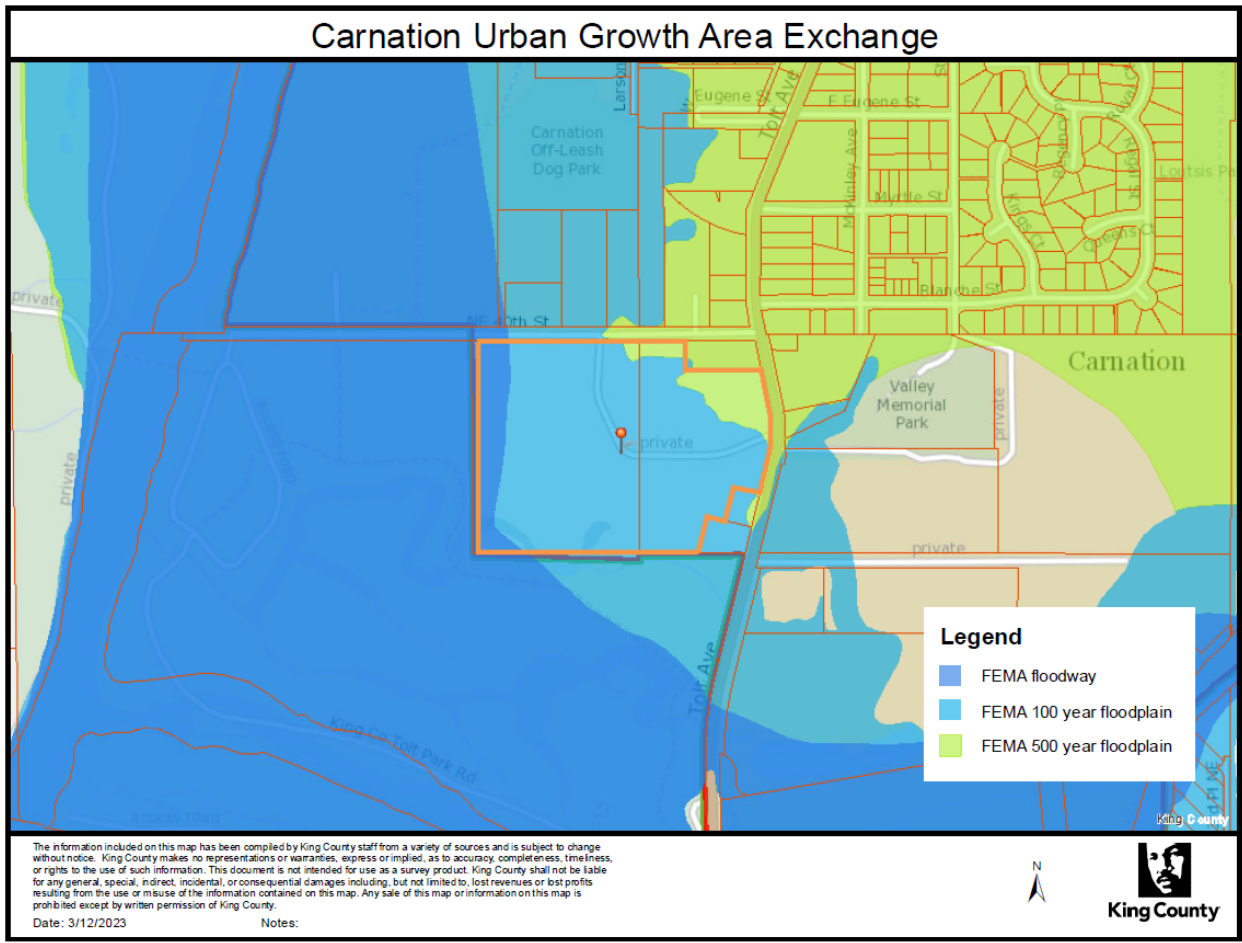
¹⁷ iMap

6. Critical Aquifer Recharge Areas Map¹⁸



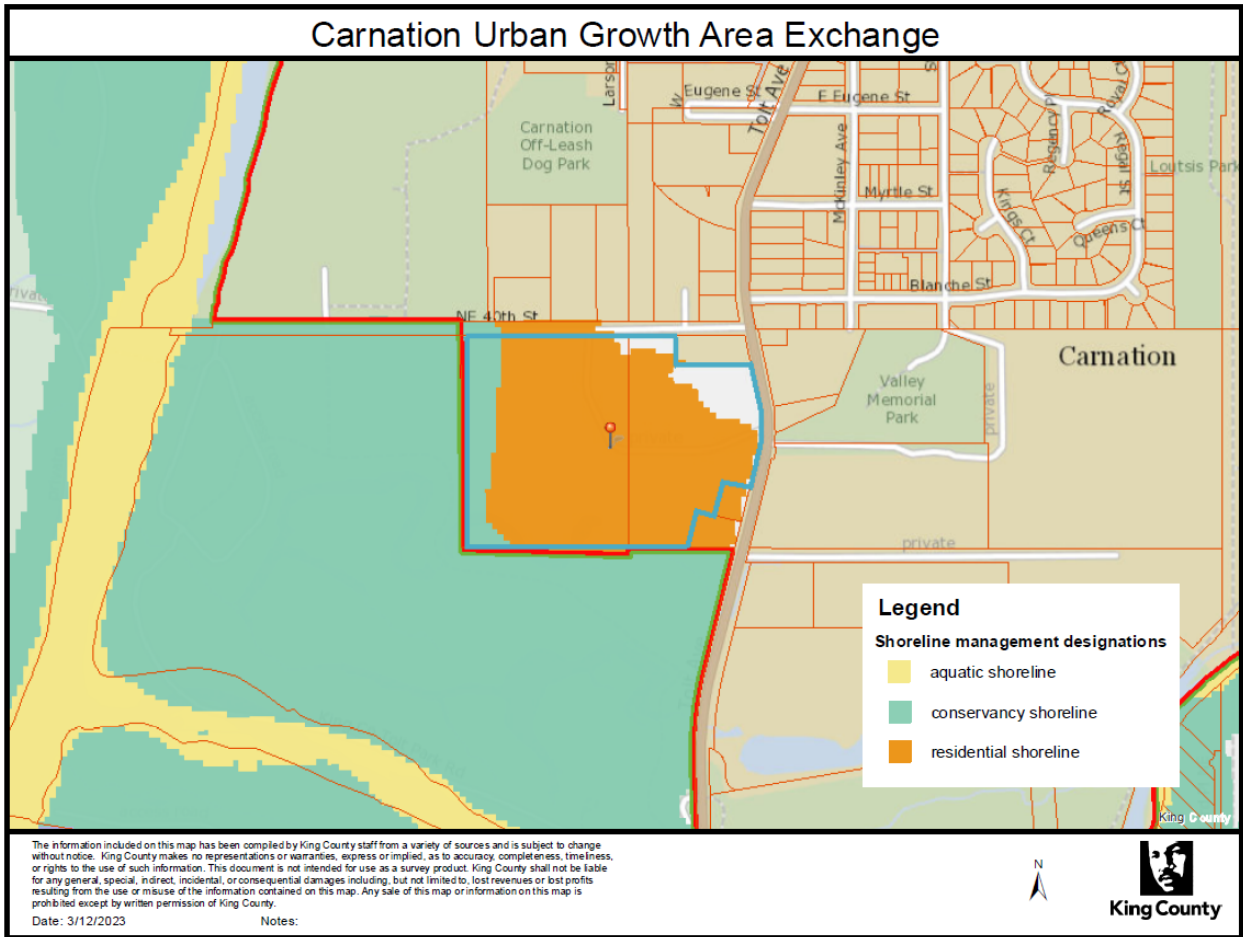
¹⁸ iMap

7. Floodplain Map¹⁹



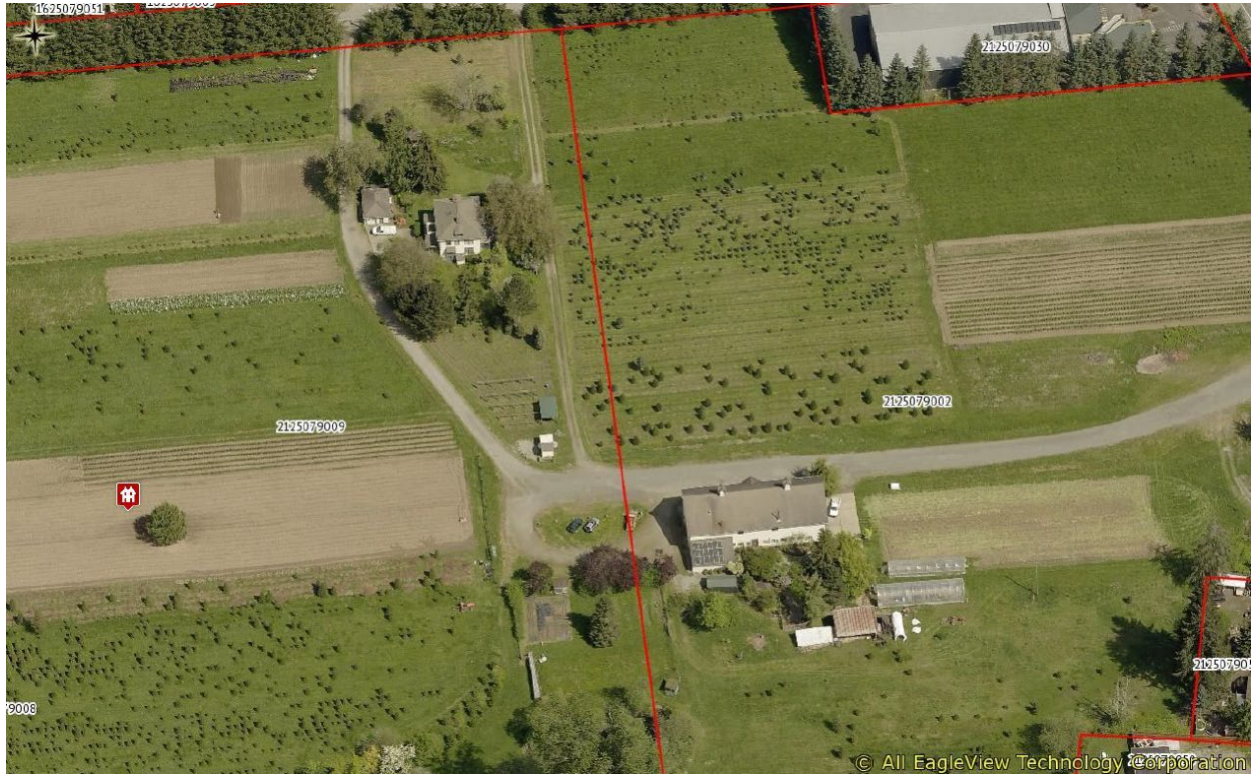
¹⁹ iMap

8. Shoreline Management Designations Map²⁰



²⁰ iMap

9. Photos^{21,22}



²¹ King County Assessor LOCALSCAPE [\[LINK\]](#)

²² Google maps street view [\[LINK\]](#)



III. Regulatory Context and Analysis

The Scope of Work directs consideration of ways to permanently protect this area from urban development. The following evaluates three regulatory and one non-regulatory options that would support this outcome.

A. Removal from the UGA

One option would be to remove the land from the UGA and designate it as rural. King County Countywide Planning Policy (CPP) DP-19 sets criteria for converting urban land to rural:

DP-19 Allow redesignation of Urban land currently within the Urban Growth Area to Rural land outside of the Urban Growth Area if the land is not needed to accommodate projected urban growth, is not served by public sewers, is contiguous with the Rural Area, and:

- a) Is not characterized by urban development;
- b) Is currently developed with a low-density lot pattern that cannot be realistically redeveloped at an urban density; or
- c) Is characterized by environmentally sensitive areas making it inappropriate for higher density development.

Based on the findings in the Urban Growth Capacity Report,²³ if the site were removed from the UGA, the projected urban growth countywide would still be able to be achieved. It also is not served by sewer, is contiguous with the Rural Area, and meets both subsection a and subsection c in the "or" list of additional criteria. Therefore, the site could be removed from the UGA under this provision.

B. Development Conditions

The site could also be protected from urban development but imposing a property-specific development condition limiting the uses allowed on the site. However, this would not permanently protect the site should it be annexed unless there is a pre-annexation interlocal agreement between the City of Carnation and the County that stipulates this requirement be carried forward by the City post-annexation.

²³ King County Urban Growth Capacity Report [\[LINK\]](#)

C. UGA Exchange

Another option identified in the Scope of Work includes considering a potential exchange of non-urban land to replace this site if it were to be permanently protected from urban development. Currently, the only "exchange" option would be to 1) protect the urban land using options A, B, or D in this study, and 2) convert compensatory rural and to urban under Countywide Planning Policy (CPP)²⁴ DP-17. This policy establishes the circumstances under which UGA expansion may occur, with additional conditions for eligible properties in DP-18.

DP-17 Allow expansion of the Urban Growth Area only if at least one of the following criteria is met:

- a) A countywide analysis determines that the current Urban Growth Area is insufficient in size and additional land is needed to accommodate the housing and employment growth targets, including institutional and other non-residential uses, and there are no other reasonable measures, such as increasing density or rezoning existing urban land, that would avoid the need to expand the Urban Growth Area; or
- b) A proposed expansion of the Urban Growth Area is accompanied by dedication of permanent open space to the King County Open Space System, where the acreage of the proposed open space:
 - 1) Is at least four times the acreage of the land added to the Urban Growth Area;
 - 2) Is contiguous with the Urban Growth Area with at least a portion of the dedicated open space surrounding the proposed Urban Growth Area expansion; and
 - 3) Preserves high quality habitat, critical areas, or unique features that contribute to the band of permanent open space along the edge of the Urban Growth Area; or
- c) The area is currently a King County park being transferred to a city to be maintained as a park in perpetuity or is park land that has been owned by a city since 1994 and is less than thirty acres in size.

The subject properties do not meet any of the criteria in this policy. Additional land is not needed to accommodate housing and employment growth targets as allowed in subsection a), as documented by the most recent Urban Growth Capacity Report. There is no land identified for consideration under the Four-to-One Program criteria for permanent open space dedication per subsection b), and the area is not a King County park as allowed in subsection c). There are additional Comprehensive Plan and King County Code requirements for Four-to-One Program eligibility that the properties do not conform with, such as a 20-acre minimum lot size and a requirement that the use on the new urban land be limited to residential development.

The Washington State Growth Management Act was amended in 2022²⁵ to provide a new option for local governments to allow for UGA exchanges, where urban land can be removed from the UGA in exchange for adding other, rural land to the UGA. In order for UGA exchanges to be allowed in King County, the CPPs would first need to be amended. The Growth

²⁴ King County Countywide Planning Policies [\[LINK\]](#)

²⁵ Engrossed Substitute Senate Bill 5593 [\[LINK\]](#)

Management Planning Council (GMPC) is currently evaluating whether to allow UGA exchanges and is anticipated to make a recommendation in mid-2023. If the GMPC recommends allowing UGA exchanges, amendments to the CPPs would need to be approved by the King County Council and then ratified by the cities in King County. Any such regulatory changes would have to comply with the UGA exchange eligibility requirements in state law; additional criteria could also be added by King County.

State law allows for UGA exchanges if, during a 10-year statutory review of a county comprehensive plan, the county "determines that patterns of development have created pressure in areas that exceed available, developable lands within the urban growth area, the urban growth area or areas may be revised to accommodate identified patterns of development and likely future development pressure for the succeeding 20-year period, if the following requirements are met:

- (i) The revised urban growth area may not result in an increase in the total surface areas of the urban growth area or areas;
- (ii) The areas added to the urban growth area are not or have not been designated as agricultural, forest, or mineral resource lands of long-term commercial significance;
- (iii) Less than 15 percent of the areas added to the urban growth area are critical areas;
- (iv) The areas added to the urban growth areas are suitable for urban growth;
- (v) The transportation element and capital facility plan element have identified the transportation facilities, and public facilities and services needed to serve the urban growth area and the funding to provide the transportation facilities and public facilities and services;
- (vi) The urban growth area is not larger than needed to accommodate the growth planned for the succeeding 20-year planning period and a reasonable land market supply factor;
- (vii) The areas removed from the urban growth area do not include urban growth or urban densities; and
- (viii) The revised urban growth area is contiguous, does not include holes or gaps, and will not increase pressures to urbanize rural or natural resource lands."²⁶

If UGA exchanges are eventually allowed in King County, the first threshold that must be met is whether there has been a determination by the County that identifies "patterns of development that are creating pressure in areas that exceed available, developable lands within the urban growth area." This UGA exchange request does not meet this requirement. The request was initiated in order to preserve a historic agricultural site by moving it out of the UGA; it is not in response to needing to bring rural land into the UGA in order to address pressure for development in areas that exceed available developable urban lands.

If this first threshold were able to be met, there are additional requirements that the rural land proposed for exchange would need to meet in order to be added to the UGA. The City of Carnation identified the following rural parcels for possible exchange, should the Tree Farm properties be removed from the UGA: parcels 2225079034, 2225079012, 2225079027, and 2225079013, as well as possibly 2125079021. However, these properties do not meet the criteria in state law:

- Converting the rural parcels to urban would result in 29.55 new acres in the UGA, or 57.67 acres if the 5th parcel (2125079021) is included. This would create a net increase

²⁶ RCW 36.70A.130(3) [\[LINK\]](#)

in the total area of the UGA compared to the removal of the 23.57 acres of the tree farm properties. This is inconsistent with the requirement in subsection (i) above.

- Two of the properties (parcels 2225079034 and 2125079021) are located within the Agricultural Production District, which does not meet the requirement in subsection (ii) that the lands not be designated as agricultural lands of long-term commercial significance.
- All five parcels are almost fully encumbered by flood hazard areas, as well as significant channel migration areas, which does not meet the threshold in subsection (iii) that the lands be less than 15 percent encumbered by critical areas.
- The configuration of new urban land would create a notch of rural lands surrounded by urban lands on 3 sides and would only be accessible by crossing rural and resource lands. This would create increased pressure to urbanize surrounding rural and resource lands, which would not meet the criteria in subsection (viii).

The County evaluated other surrounding rural lands for possible eligibility. RA-10 zoned lands northwest of the City, between the Potential Annexation Area and the Snoqualmie River, were deemed ineligible as they are fully encumbered by flood hazards. Lands northeast of the city are ineligible as they are in the Agricultural Production District. RA-10 zoned lands east of the City are also likely ineligible as they are substantively encumbered by steep slopes and associated potential erosion and landslide hazards. RA-10 zoned lands to the southeast were also deemed ineligible as they are overwhelmingly encumbered by flood and channel migration hazards.

D. Non-Regulatory Protection

In addition to the existing historic designation and current use taxation program enrollment, other non-regulatory options, also include:

- removing development rights from the property via the Farmland Preservation Program²⁷ and/or Transfer of Development Rights Program;²⁸ or
- Purchase of the property by the County and/or private entity for the purpose of permanent conservation.

IV. Equity and Social Justice Analysis

Equity and/or social justice issues are not anticipated at this time because this area has a low 2019 Equity Score of 1.33.²⁹ This score indicates a low presence of priority populations identified in K.C.C. Chapter 2.10 (people of color, people with low-incomes, and/or people with limited English proficiency).

V. Engagement

Executive staff met with the Carnation City Manager in August and September 2022 to discuss the issue, to better understand the City's interests, and to identify the regulatory requirements under state law. Executive staff also participated in a City Council meeting in September 2022, where the City discussed the issue and supported moving forward with conversations with the County about a potential exchange. In October 2022, the City provided the list of the rural properties that could potentially be exchanged for the Tree Farm parcels. An additional meeting

²⁷ King County Farmland Preservation Program [\[LINK\]](#)

²⁸ King County Transfer of Development Rights Program [\[LINK\]](#)

²⁹ Link to King County Census Viewer ([arcgis.com](#)) [\[LINK\]](#) Scores range 1 to 5, with higher scores representing a more diverse, less wealthy population.

also occurred in January 2023 to share initial recommendations of the regulatory analysis, as well as a follow-up meeting in April.

Throughout these conversations, the City has indicated that it does not support removing the site from the UGA without replacement land being added to its UGA. The City has also expressed concern about putting a conservation easement on the site and/or acquiring it or its development rights, as the site is a key part of future development plans for the City.

Conversations with the office of King County Council District 3 (which this study area is located in) also occurred throughout the review and analysis process.

Public notice of the evaluation of the land use and zoning for this area was identified in:

- **The Draft Executive Early Concepts Proposals of the 2024 Update** that was issued for public review and comment January 30 through February 24, 2023. Notice of the comment period was provided via the County website, County email distribution lists, social media, and printed notices. The Early Concepts Proposals stated that the UGA exchange proposal would not meet the criteria under state law and, therefore, no land use or zoning changes were recommended. No public comments were received on this item.
- The Executive's draft recommendation for this study in the **Public Review Draft of the 2024 Update** that was issued for public review and comment in June to July 2023. Notice of the comment period was provided via the County website, County email distribution lists, social media, and area-specific newspaper notices. No public comments were received on this item.

III. Conclusion and Recommendation

A. Conclusion

The City has indicated that it does not support removing the site from the UGA or otherwise preserving it from urban development without replacement land being added to its UGA. Such a change would be dependent on whether the GMPC recommends creating a UGA exchange program as noted above. However, the proposal does not meet the criteria for an UGA exchange under the state law. Should the CPPs be changed to allow for use of such an exchange program in King County, the proposal would not be eligible.

B. Recommendation

No changes are recommended.