



March 14, 2025

Dear Growth Management Planning Council,

Thank you for considering the housing target reconciliation request by the City of Carnation. We look forward to resolving this issue so we can move forward with the Land Use and Housing Elements of our Comprehensive Plan.

We would also like to briefly address the letter that Peterson Russell Kelly Livengood PLLC submitted on behalf of Nancy Harvold.

Although we could respond with rebuttal to each and every issue presented in the letter, we want to stay focused on the issue at hand, which is a reconciliation request to bring Carnation's housing target in line with King County's recommendation. The reconciliation request is separate from and in no way relevant to a landowner's interest in annexation.

As previously discussed, after careful analysis and modeling, the King County Office of Performance, Strategy and Budget recommended a housing target for the City of Carnation between 176-341 with a baseline of 273. Prior City of Carnation staff, not understanding the process and without City Council knowledge, erroneously put forth a housing target of 799 housing units. This would double the number of homes in Carnation, creating unsustainable pressure on a community that is one square mile in size. Our reconciliation request is a reasonable housing target of 350, creating consistency with King County's recommendation.

Carnation is looking forward to completing our comprehensive plan elements and doing its part to fulfill the County's affordable housing goals. Our goal is to provide density within City limits by zoning for multi-family units.

Contrary to what is presented in the Peterson letter, Carnation currently has middle housing units in development including duplexes, townhomes and condominiums. Current expansion of middle housing units is a welcome addition to our existing middle housing stock. Our next focus must be on affordable housing, not more middle housing. A focus on more middle housing does little to diversify the housing stock, which is also an important goal of this comprehensive plan update process.

Furthermore, a reconciliation of Carnation's housing target does not preclude annexation of the Harvold property in the future. An annexation request requires studies and careful consideration to ensure that public safety, transportation, utilities and flood-plain management are sufficient for an annexation of the proposed magnitude. We also need to ensure compliance with the Growth Management Act by limiting urban sprawl and enhancing open space.

Of important note is Snoqualmie Tribe Environmental Policy Analyst Matthew Baerwalde's comments on annexation of the referenced property:

"The Tribe is concerned that annexation of the subject parcels will result in further unsustainable, unwise, and unsafe development of the Snoqualmie River floodplain. The majority of King County Parcel 1625079047 and approximately 1/3 of Parcel 1625079003 are within the Regulatory Floodplain of the Snoqualmie River. The entirety of those parcels, and most of the other subject parcels, lie within the mapped 500-year floodplain, and within the historic alluvial fan/channel migration zone of the Tolt



River. Also, the current mapped FEMA floodway for the Snoqualmie River touches the northwest corner of King County Parcel 1625079047. Floodway areas may be expected to regularly exhibit deep and fast-flowing floodwaters.

If the City's annexation proposal were to bear out, this could mean that not long after the subject would-be annexed parcels are developed, they will also be in a high hazard flood zone. The good news is that this can easily be avoided by simply preserving floodplain areas for floodplain and habitat functions, not encroaching on those current and future flood zones, and directing future development to safer areas further in the uplands. With that in mind, if the City of Carnation needs to expand its boundaries to enable development, we urge the City to look outside current—and future expected—flood zones."

Finally, the City is very concerned about the implication that the impacts of significant population increase on the City's ability to mitigate a potential natural disaster should be discounted. The assertion that there have been significant improvements to the Tolt Dam Early Warning System since August 20, 2024, is false. The early warning alarm system has been deactivated since March 2024 due to false alarms and system unreliability. The City has no active alarm system in the event of a dam failure. Furthermore, the 20 acres mentioned that would be "more than sufficient" to accommodate the populace of Carnation in the event of dam failure is a steep hill, inaccessible by anyone with mobility issues, which has a flat surface of approximately ½ acre. Driving out of Carnation will be gridlock with only one road in and out of Carnation. The City is in the best position to understand its disaster preparedness limitations and to voice concerns about those deficiencies in the context of housing targets.

Thank you again for the considerable time and attention the GMPC has put into the reconciliation request.

Sincerely,

Adair Hawkins

Adair Hawkins (Mar 14, 2025 13:06 PDT)

Adair Hawkins
Mayor

Brodie Nelson

Brodie Nelson
Councilmember

Jessica Merizan

Jessica Merizan
Councilmember

Jim Ribail

Jim Ribail (Mar 14, 2025 12:19 PDT)

Jim Ribail
Deputy Mayor

Ryan Burrell

Ryan Burrell (Mar 14, 2025 12:56 PDT)

Ryan Burrell
Councilmember

Rhonda Ender

Rhonda Ender
City Manager



05/15/2023

Rhonda Ender
Community Economic Development Principal
City of Carnation
4621 Tolt Avenue
Carnation WA 98104

Via email to: rhonda.ender@carnationwa.gov

Re: City of Carnation potential annexations (North of existing City Limit)

Dear Rhonda,

Please accept the following comments from the Snoqualmie Indian Tribe regarding the proposed annexation of certain parcels North of the existing Northern City Limit, including the current Harvold Berry Farm and other parcels. The Snoqualmie Indian Tribe [Tribe] is a federally-recognized sovereign Indian Tribe and a signatory to the Treaty of Point Elliott of 1855 in which it reserved to itself certain rights and privileges, and ceded certain lands to the United States. As a signatory to the Treaty of Point Elliot, the Tribe specifically reserved to itself, among other things, the right to fish at usual and accustomed areas and the “privilege of hunting and gathering roots and berries on open and unclaimed lands” off-reservation throughout the modern-day state of Washington (Treaty of Point Elliot, art. V, 12 Stat. 928). The City of Carnation’s jurisdictional boundaries encompass one of the Snoqualmie Tribe’s larger historic village sites, and the Tribe has had a documented guiding presence in what is now the City of Carnation (formerly Tolt, after the Snoqualmie Village name) from time immemorial, and which continues to this day.

The Tribe is concerned that annexation of the subject parcels will result in further unsustainable, unwise, and unsafe development of the Snoqualmie River floodplain. The majority of King County Parcel 1625079047 and approximately 1/3 of Parcel 1625079003 are within the Regulatory Floodplain of the Snoqualmie River. The entirety of those parcels, and most of the other subject parcels, lie within the mapped 500-year floodplain, and within the historic alluvial fan/channel migration zone of the Tolt River. Also, the current mapped FEMA floodway for the Snoqualmie River touches the northwest corner of King County Parcel 1625079047. Floodway areas may be expected to regularly exhibit deep and fast-flowing floodwaters.

The Snoqualmie Tribe has published and/or partnered in multiple efforts to characterize the hydrologic changes that may be expected to occur in the Snoqualmie watershed as a result of climate change*. Our results, which we have shared, should be cause for concern for a low-lying jurisdiction such as Carnation. As longtime Valley residents can already attest to, changes are

already occurring in our watershed. Floods behave differently than they have in the past, likely due to more intense rainfall, often carried by increasingly frequent “atmospheric rivers.” These observations comport with the Tribe’s climate change research. Due to the expected continuing effects of climate change, flooding will become more frequent and severe floods may be more severe. More “floods of record” may be expected. What this means in terms of the mapped floodplain and floodway is that should be expected to commensurately expand. On a local level, it should be expected to expand on the subject proposed annexation parcels—and not at some distant time far away in the future; according to locally based published research, significant changes may be observed by the 2040s. If the City’s annexation proposal were to bear out, this could mean that not long after the subject would-be annexed parcels are developed, they will also be in a high hazard flood zone. The good news is that this can easily be avoided by simply preserving floodplain areas for floodplain and habitat functions, not encroaching on those current and future flood zones, and directing future development to safer areas further in the uplands. With that in mind, if the City of Carnation needs to expand its boundaries to enable development, we urge the City to look outside current—and future expected—flood zones.

Thank you for the opportunity to comment. If you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Baerwalde', followed by a long horizontal line extending to the right.

Matt Baerwalde
Environmental Policy Analyst
Snoqualmie Indian Tribe ENR Department
425-363-2008

* <https://doi.org/10.1111/1752-1688.13011>

[DOI 10.1088/1748-9326/abf393](https://doi.org/10.1088/1748-9326/abf393)

https://cfpub.epa.gov/si/si_public_record_report.cfm?Lab=CPHEA&dirEntryId=347205