
From: Terrence Danysh <tdanysh@prklaw.com>
Sent: Wednesday, March 19, 2025 8:01 AM
To: kcexec@kingcounty.gov; Perry, Sarah
Cc: Nancy Harvold; Miller, Ivan; Maskin, Rebecca; Hollingshead, Libby; Rhonda Ender; Charlie Beckett; David Johnston; Ron Branch; Terrence Danysh
Subject: RE: Comments on City of Carnation's Reconciliation Request to GMPC (HARVOLD REPLY TO CITY 3/14 LETTER)
Attachments: Tolt Dam Early Warning System - Utilities _ seattle.gov.pdf; Emergency Management - Carnation, WA.pdf
Importance: High

Dear County Executive Constantine, Councilmember Perry and members of the Growth Management Planning Council:

We are in receipt of the City of Carnation's 3/14 response to our letter of 3/12. We recognize that the annexation process is inherently a political one, and appreciate the City's willingness to consider further efforts on our client's part.

However, with respect to the reconciliation process that the GMPC is considering now, we believe that the crisis in housing in Washington (and not just affordable housing, though that deserves priority) requires context in this case. Specifically, given Carnation's history, it's worth examining the City's willingness—or lack thereof—to grow at a pace that's commensurate with other communities in King County (particularly as a result of the state's middle housing mandate).

The City suggests that a growth target of 799 was staff error. However, even if true, it is a number that the City and County have planned around for years. A growth target of 799 is well within the City's capacity (going back to at least 2015, when Carnation's Comprehensive Plan, as voted on by the Carnation City Council, called for approximately 900 additional housing units by 2035).

Table H-5 from City of Carnation 2015 Comprehensive Plan – HOUSING ELEMENT

**Table H-5
Projected Housing Units in the Urban Growth Area**

	Existing Number of Dwelling Units	Projected Dwelling Units	Projected population
Year	2010	2035	2035
Carnation UGA	720	1,645	4,652

Even in 2025, that goal is readily attainable over the next ten years. Our client's proposed annexation (and development proposal) would go a long way to fulfilling the City's growth obligations.

In fact, the County and local utilities have already invested a substantial amount for capital facilities to meet that earlier target. These facilities include:

1) Carnation's Sanitary Sewer System, which has been designed and built to accommodate a population of 4,974, exceeding the projected population of Carnation even at the 799 housing target;

- 2) Carnation's Wastewater Collection System, which includes 5 main trunk lines, and specifically Trunk Line E, which terminates at Stewart Avenue, immediately on the edge of Ms. Harvold's property;
- 3) PSE's Tolt Substation, which was built to accommodate 4,600 households, and designed to accommodate as many as 5,750 households.

Lowering Carnation's target from 799 to 350 now, after these improvements have been made to support such development, seems to belie an effective use of taxpayer funds. This is particularly so given the fiscal challenges state and local governments face.

Also, the City's comments differentiating middle housing from affordable housing miss the mark. Middle housing refers to density, not class. Middle housing can be affordable housing (and is part of our client's proposal). The City's efforts to resist middle housing (and increased housing targets) come at the expense of making housing more unaffordable.

Finally, the City may indeed have different information than we do about progress made on the Tolt Dam Warning System. However, Carnation's own Disaster Preparedness site indicates the installation of new sirens in furtherance of overall system upgrades (see attached, confirmed separately by the City of Seattle).

Respectfully,

Terry Danysh
Counsel to Nancy Harvold

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Emergency Information & Disaster Preparedness

Snow Plow Plan

[Snow Plow Map](#)

[City of Carnation Snow Plan](#)

[PSE Outage Reports & Map](#)

Report an outage, and access to real-time updates and a service alert map to monitor how PSE is doing restoring your service.

- [Report or check a power outage](#)

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Tolt Dam & Reservoir

UPDATE Seattle Public Utilities has completed the first phase of construction for the new state-of-the-art Tolt Dam Early Warning System (four new outdoor and five new indoor sirens). **Full audible testing of the new sirens will occur July 11th, 12th, 14th and 15th between 9 am and 5 pm.** During this period, residents in the Carnation area may hear loud sirens and see flashing alerts multiple times throughout the day. Audio messages in English and Spanish stating that the sirens are a test will be played before and after each round of testing, so residents are aware system testing is taking place and there is no emergency.

Note: The new sirens will not be tested on Wednesday, July 13. The regular Wednesday at Noon test of the existing warning system will take place as normal on this day.

The nine new sirens in Carnation that will be tested are located at:

1. 35805 NE 80th St (outdoor siren)
2. 6921 Tolt River Rd NE (outdoor siren)
3. 5502 Tolt River Rd NE (outdoor siren)
4. 32421 E Entwistle St (outdoor siren)
5. 334th Ave NE and Tolt River Road NE (outdoor siren)
6. 4950 Tolt Ave –Elementary School (indoor annunciator)
7. 3740 Tolt Avenue –Middle School (indoor annunciator)
8. 3944 320th Ave NE – Bus Facility (indoor annunciator)
9. 3600 Tolt Ave – Fire Station (indoor annunciator)

The City of Seattle owns and operates the Tolt Reservoir and Dams, located 16 miles upstream from Carnation on the South Fork Tolt River. The reservoir stores 30% of the drinking water for the metropolitan Seattle area. In the unlikely event of a dam failure, water from the reservoir may inundate the city of Carnation.

The Tolt Dam Early Warning System alerts residents in the city of Carnation to evacuate in the unlikely event of a dam failure. Siren testing for the warning system is conducted at noon every Wednesday. The tests involve activating the sirens and playing pre-recorded messages.

Seattle Public Utilities is working to replace the aging system with state-of-the-art technology and equipment that will improve the resiliency, reliability, and security of the emergency warning system.

- [Seattle Public Utilities - Tolt Dam](#)
- [Dam Safety Brochure \(PDF\)](#)
- [Tolt Dam Warning System Replacement Project](#)

Dam Breach Evacuation



In the event of a catastrophic failure of the Tolt Dam, the City has a 20-acre pedestrian evacuation site in Tolt Highlands. An evacuation trail starts at the east end of NE 50th St, and the other begins on E Entwistle St going up Tolt Highlands Rd(see map). The routes to these trail are marked by pedestrian evacuation signs. The evacuation site is for pedestrian access only, no vehicles. For vehicular evacuation, follow the route signs north on SR 203 to Stillwater Hill Rd.

Sign-up to receive important information from King County Emergency Management about potential hazards that impact the Carnation area, including status updates on the Tolt Dam.

- [ALERT King County](#)

Carnation ...ready, set, PREPARE

In order to help our community become better prepared, the City launched **Carnation...ready, set, PREPARE** to provide important emergency preparedness information to help all citizens be better prepared in case of a disaster.

Personal and Family Preparedness

Emergencies can happen anywhere, any time. Make sure you're ready at home, in your car, at work, and at school with a plan to respond and recover from disasters.

Business Preparedness

Businesses play a critical role in emergency preparedness. Not only do they need a plan for continuing or restarting operations following a disaster, they want to ensure the safety and well-being of their employees.

Emergency Preparedness Guide

Disasters Happen: Are You Ready? This extensive guide from Washington State Emergency Management can help you learn about different hazards and actions you can take to stay safe.

What to do to make it through

It's not a matter of if, but when. At some point, you will face a significant emergency or disaster situation. Will you be ready to make it through and eventually return to some sense of normal? Get ready now. Make a Plan. Build a Kit. Get Involved.

Hooking Up a Generator Safely

Hooking up a gas generator incorrectly can lead to dangerous carbon monoxide poisoning. Emergency management expert Eric Holdeman shows the do's and don'ts. (via [KingCountyTV](#))

Carnation-Duvall Citizen Corps Council

Join the Carnation-Duvall Citizen Corps Council to make our community safer, stronger and better prepared. On the theme, "Prepare for the worst and hope for the best", they offer some examples of the worst, and then give you some effective ways to cope with disaster. Review the programs they offer, then look at the links to preparedness kits and plans. If you don't find what you are looking for, email info@cdccc.us.

Sound Shake: Business Earthquake Preparedness

Prepare your business or organization for the potential impacts of an earthquake or other disaster. This workplace exercise will help your organization take reasonable and responsible steps to provide a foundation for your response to a disaster.

Seattle Public Utilities (utilities)



(/) > [Home \(utilities\)](#) > [Neighborhood Projects \(utilities/neighborhood-projects\)](#) ▾

Tolt Dam Early Warning System



This project will improve the resiliency and reliability of the Tolt Dam Early Warning System.

February 11, 2025 Update

Seattle Public Utilities has hired a panel of third-party experts (see information below about panelists) to review the Tolt Dam Early Warning (siren) System and provide suggestions for a path forward for the project.

The panel is currently:

- Reviewing regulations that relate to dam safety, public alerting, and emergency response.
- Evaluating past issues related to the Tolt Dam Early Warning System and how the City of Seattle responded.
- Conducting interviews with residents, business owners, visitors, Carnation elected officials, King County Office of Emergency Management staff, agency partners, and other key stakeholders.

The panel will be in the Carnation community several times over the next few months, visiting project features and gathering information. They will develop recommendations and considerations for a path forward regarding the Tolt Dam Early Warning System. The results of that assessment will be summarized and shared in a public report on this website by July 2025. If you have any questions about this process or information to share with the panel, please contact our project team at tews.info@seattle.gov (<mailto:tews.info@seattle.gov>) or [\(206\) 494-5986](tel:+12064945986) (tel: +1 (206) 494-5986).

Panel members:

Project Manager: Greg Richards, Gannett Fleming

Greg is a senior project manager in the dams and hydropower group of Gannett Fleming. He is a strong leader in dam safety and has led efforts related to dam failures and incidents including the development of the Association of State Dam Safety Officials' (ASDSO) DamFailures.org website. He is experienced in the organization of multidisciplinary teams and will lead the coordination and project management aspects of this project to keep the team on track and complete the project on time.

Team Lead / Dam Safety and Risk Expert: Mark Baker, Dam Crest Consulting

Mark is an industry leader with extensive dam safety and risk experience working at US Bureau of Reclamation (USBR), the National Park Service (NPS), and Bureau of Indian Affairs (BIA). He has also performed independent dam incident investigations and led the Spencer Dam failure Investigation team. He worked extensively with USBR/BIA putting in warning systems and worked for years on improving their reliability. He understands issues related to dam failure alarms, including false alarms and response related to them. He also covered the human factors portion of Spencer Dam investigation and is a leader in that regard. He is the chair of the ASDSO Dam Failures & Incidents Committee.

Emergency Management and Public Alerting expert: Dr. John Sorensen, Independent Researcher

John is a recognized expert with decades of experience in hazard and emergency management. He has researched evacuation and warning throughout his career. He worked on HEC-Lifesim, a software widely used in the dam industry for evaluating the consequences of dam failures. He has authored several key guidelines for the US Army Corp of Engineers (USACE) on the public alert and warning for dam and levee emergencies. He was involved in the Oroville dam spillway incident to evaluate the evacuation of the downstream communities. He has done studies on false warning and the impact on evacuation.

Risk Communication expert: Prof. Ann Bostrom, University of Washington

Ann is a recognized expert in risk communication and has collaborated on investigations of public and professional communication for diverse hazards, including earthquakes, flashfloods, and hurricanes. She has contributed to numerous studies on risk perception and communications of warning systems and responses to hazard forecasts and warnings. She has also advised several federal agencies on science and risk communication through her work on science advisory committees and on the National Academies of Sciences, Engineering, and Medicine committees.

Project description

The [Tolt Dam Early Warning System](https://utilities.your-services/water/water-system/dam-safety/tolt-dam.xml) ([/utilities/your-services/water/water-system/dam-safety/tolt-dam.xml](https://utilities.your-services/water/water-system/dam-safety/tolt-dam.xml)) alerts residents in the City of Carnation to evacuate in the unlikely event of a dam failure. The first emergency warning system for the Tolt Dam area was implemented in 1978 as a single siren controlled by King County. The City of Seattle took over responsibility for the siren system in 1981 and the first network improvement occurred in 1985. Additional improvements were made in 1993. The capital project will replace the aging system, now in its fifth generation and difficult to maintain, with state-of-the-art technology and equipment that will improve the resiliency, reliability, and security of the emergency warning system.

The project will:

1. Replace, and improve outdated siren and supporting system components.
2. Add redundancy, resiliency, and reliability where necessary.

3. Address consistent evacuation procedures and protocols with additional signage.
4. Listen and respond to community needs and suggestions.

Location

New outdoor sirens and indoor alerting devices have been installed at key locations within the inundation area. This included replacing sirens at existing sites and adding three new siren locations for sirens and additional highway messages signs.

Here are the locations where the 7 new outdoor sirens and the 4 new indoor sirens (annunciators) have been installed for phase one of the project:


1. 35805 NE 80th St (replaced outdoor siren)
2. 6921 Tolt River Rd NE (replaced outdoor siren)
3. 5502 Tolt River Rd NE (replaced outdoor siren)
4. 32421 E Entwistle St (replaced outdoor siren)
5. Tolt MacDonald Park (new outdoor siren)
6. Near the intersection of NE 60th St and SR 203 (new outdoor siren)
7. Tolt Highlands Rd NE and Tolt River Road NE, City of Carnation Public Works yard (new outdoor siren)
8. 4950 Tolt Ave –Elementary School (replaced indoor annunciator)
9. 3740 Tolt Avenue –Middle School (replaced indoor annunciator)
10. 3944 320th Ave NE – Bus Facility (replaced indoor annunciator)
11. 3600 Tolt Ave – Fire Station (replaced indoor annunciator)


Community benefits

This project will improve the resiliency and reliability of the Tolt Early Warning System by upgrading it with state-of-the-art technology and equipment and adding more redundancy in the system. When the project is completed, stakeholders and residents in the Carnation area will have a new emergency warning system that better meets the needs and expectations of the community.


Community engagement and project materials






The project team provides bi-weekly updates to Carnation City officials, updates this website regularly, and sends informational emails to subscribers.

Please [subscribe to the project email list](#)  (https://public.govdelivery.com/accounts/WASEATTLE/subscriber/new?topic_id=WASEATTLE_347) to receive these updates.

ALERT King County: To stay informed about potential hazards and threats that impact the Carnation area, including status updates on the Tolt warning system, sign up for [ALERT King County](#)  (<https://www.kingcounty.gov/depts/emergency-management/alert-king-county.aspx>).


All materials PDF format unless noted as video.

- [Notice of Application \(King County Permitting\), April 25, 2023](#) 
([documents/Departments/SPU/Documents/Projects/ToltDamEWS/SHOR23-0004-Notice-of-Application.pdf](#))

- [Project Update Mailer, December 2022 / Anuncio de actualización del proyecto de diciembre de 2022](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/ToltEarlyWarningSystem-ProjectUpdateMailer_2022.pdf)
- [Siren Coverage Maps](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/ToltEarlyWarningSystem-SirenCoverageMaps.pdf)
- [Video of Carnation Community Meeting, May 11, 2022](#) 
(https://youtu.be/vEZSgLe15w)
- [Presentation to Carnation Community, May 11, 2022](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/CarnationCouncilMonthlyUpdate-051122.pdf)
- [Video of Carnation Community Meeting, December 15, 2021](#) 
(https://youtu.be/l2H5KHfjZtU)
- [Presentation to Carnation City Council, July 20, 2021](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/CarnationCouncilMonthlyUpdate-072021.pdf)
- [Video of Carnation Community Meeting, June 30, 2021](#) 
(https://www.youtube.com/watch?v=bMYpEuxbCIM)
- [Presentation to Carnation Community, June 30, 2021](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/TEWS-June30-presentation-final-06302021.pdf)
- [Presentation to Carnation City Council, May 18, 2021](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/CarnationCouncilMonthlyUpdate-051821.pdf)
- [Presentation to Carnation City Council, April 2, 2021](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/CarnationCouncilMonthlyUpdate-042021.pdf)
- [Presentation to Carnation City Council, March 2, 2021](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/CarnationCouncilMonthlyUpdate-030221.pdf)
- [Video of Carnation Community Meeting, February 24, 2021](#) 
(https://youtu.be/0GxvZt78bAg)
- [Presentation to Carnation Community, February 24, 2021](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/TEWS-Presentation-022421.pdf)
- [Presentation to Carnation City Council, August 3, 2020](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/ToltWarningSystem_FalseAlarm2020-07-28.pdf)
- [Presentation to Carnation City Council, Jan 19, 2021](#) 
(documents/Departments/SPU/Documents/Projects/ToltDamEWS/ToltWarningSystem_FailedWeeklyTest_2021-01-15.pdf)

Additional alerts and warning systems

The combination of outdoor and indoor siren locations is designed to reach as many people as possible in the Carnation area and is just one component of the emergency notification plan for the Tolt Dam. Other alert and warning systems that will be used in the event of an emergency include:

- [ALERT King County](https://www.kingcounty.gov/depts/emergency-management/alert-king-county.aspx)  (<https://www.kingcounty.gov/depts/emergency-management/alert-king-county.aspx>) notifications sent to everyone who is signed up
- Wireless Emergency Alerts sent to all available mobile devices in the area, similar to Amber Alerts. Double check that emergency and/or public safety alerts are enabled on your phones.
- On-the-ground evacuation notices made by local police and firefighters in Carnation, including knocking on doors and loudspeaker messages
- Emergency TV and radio alerts made to the Puget Sound area
- Social media alerts posted by local agencies
- National Oceanic and Atmospheric Administration (NOAA) and National Weather Service (NWS) weather radio warnings delivered
- Local community notifications from family, friends, coworkers, and neighbors

 [Schedule](#)

 [Background](#)

Subscribe to updates

Sign up to receive updates for the Tolt Dam Early Warning System Replacement Project from Seattle Public Utilities.

Subscribe now  (https://public.govdelivery.com/accounts/WASEATTLE/subscriber/new?topic_id=W)

Contact us:

[tews.info@seattle.gov](mailto:%20tews.info@seattle.gov) (<mailto:%20tews.info@seattle.gov>)

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Public Utilities

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 (<http://atyourseattle.seattle.gov/>)

 (<http://www.seattle.gov/utilities/about-us/media/newsletters>)

 (<http://atyourseattle.seattle.gov/feed/>)

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([//news.seattle.gov](https://news.seattle.gov/))

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 All City Newsletters

(https://public.govdelivery.com/accounts/WASEATTLE/subscriber/topics?qsp=CODE_RED)



Popular Pages

1. Look Up Collection Day
([utilities/your-services/collection-and-disposal/your-collection-day/look-up-collection-day](https://www.seattle.gov/utilities/your-services/collection-and-disposal/your-collection-day/look-up-collection-day))

2. Bills & Payments
([utilities/your-services/accounts-and-payments/bills-and-payments](https://www.seattle.gov/utilities/your-services/accounts-and-payments/bills-and-payments))

3. Where Does It Go? Tool
([utilities/your-services/collection-and-disposal/where-does-it-go](https://www.seattle.gov/utilities/your-services/collection-and-disposal/where-does-it-go))

[View the Departments & Agencies List \(departments\)](#)

[4. Accounts & Payments \(utilities/your-services/accounts-and-payments\)](#)

[5. Special Item Collections \(utilities/your-services/collection-and-disposal/garbage/special-item-collections\)](#)

Seattle Public Utilities (SPU) is comprised of three major direct-service providing utilities: the Water Utility, the Drainage and Wastewater Utility, and the Solid Waste Utility.

[About Our Digital Properties \(about-our-digital-properties\)](#) [Privacy Policy \(tech/data-privacy/privacy-statement\)](#) [Title II: Americans with Disabilities Act \(americans-with-disabilities-act\)](#) [Title VI: Civil Rights Act \(civilrights/laws-we-enforce/title-vi-civil-rights-act\)](#) [Sitemap \(/www.seattle.gov/sitemap\)](#)