

March 9, 2024

To: Fereshteh Dehkordi, KC DLS-P Program Manager

Re: **Temporary Use Permit/TEMP23-0011**

The Joint Rural Area Team (*), comprised of dozens of rural residents and organizations, urges you to deny a Temporary Use Permit (TUP) for **28908 and 29005 Carnation Farms Road** and the large volume of events and number of attendees proposed.

King County has many good policies and codes to protect the Rural RESIDENTIAL Area, many of which preclude commercial business operations and businesses that cater to urban residents while protecting traditional rural activities such as agriculture. Yet, King County often fails to uphold its own policies and codes by allowing such uses that violate same. This is extremely frustrating to all of us who seek to protect the Rural Area from repeated, ongoing attempts by many to exploit rural properties purely for money-making schemes

This application, seeking up to 60 events per year for up to 500 people for weddings and 4,000 for music events, violates every King County policy protecting the Rural Area. Clearly, these activities do NOT support traditional rural activities but, instead, are yet another attempt by commercial interests to use rural properties for money-making commercial activities catering to thousands of urban dwellers—essentially an urban-serving business. If approved, this application would bring up to tens of thousands of people and vehicles into a quiet rural area for whatever intrusive, loud, "events" might be held! This is NOT acceptable and violates all of the King County goals, codes, and policies documented in the Comprehensive Plan and Countywide Planning Policies.

The proposed level of activity and volume of guests would impose huge, negative impacts on surrounding property owners (noise, traffic, parking, etc.), while also creating a Disneyland-type of carnival atmosphere into a quiet, rural area next to the Snoqualmie River.

Of particular alarm, this proposal is within a zoned Agricultural Production District. King County Residents have voted and approved taxes to buy development rights to ensure Agriculture is the primary focus and will continue. It was not protected (i.e., development rights removed) to create pretty scenery for Event Venues. This proposal has significant impacts on the ability of agriculture to function. These roads move equipment and sometimes livestock. They provide access to u-pick and local farm stands. Farmers and employees use these roads to move within the District and come and go to get supplies. Agricultural fields are not for parking for events. One of King County's six Guiding Principles (ref.: *2024 KCCP Major Ten-Year Update*) is: "*Preserve irreplaceable resource lands, parks and critical areas.*" Agriculture and its ability to thrive are a high priority for all of King County.

Further, the volumes of traffic generated on a substandard County Road would create significant safety hazards for both vehicle drivers and the hundreds of bicyclists that heavily use these rural roads. It is infeasible to believe that thousands of added vehicles, equivalent to the fully loaded capacity of a two-lane state highway, could be added onto narrow, curving, substandard roads in any reasonably safe manner. To be clear, the access roads to even get to Carnation Farm Road also are inadequate and substandard.

Carnation Farms directly abuts King County's Chinook Bend Natural Area and prime chinook spawning habitat on the Snoqualmie River. One cannot add such huge events, traffic, parking, and use without negatively impacting this natural area, the river, and salmon. King County has spent a lot of money and effort in restoration work at Chinook Bend that could all be negatively impacted. Attendees at events would no doubt flock to the rivershore in this natural area and create huge impacts from partying, camping, swimming, etc. There also is a Baptist youth camp, Camp Gilead, immediately to the east of Carnation Farms and increased traffic would create increased risks for youth near the road and/or for being able to access the camp.

Our Joint Rural Area Team has been terribly frustrated for years by King County's unwillingness to prevent "event centers" from locating in the Rural Area. In fact, "event centers" that are used for weddings and such are NOT allowed by King County Code and are NOT in the land-use tables. Any of these "centers" should, in fact, be shut down as clear violations of King County codes and policies. Thus far, King County has been explicitly unwilling to enforce the code. That needs to change. King County must not approve any new uses that violate its very own codes and should take action to shut down those in existence that already are violating your codes.

We emphasize the requirements for a TUP in King County Code:

"21A.32.100 Temporary use permits - uses requiring permits. Except as provided by K.C.C. 21A.32.110, a temporary use permit shall be required for any of the following:

- A. A use not otherwise permitted in the zone that can be made compatible for a period of up to sixty days a year;*
- B. The expansion of an established use that: 1. Is otherwise allowed in the zone; 2. Is not inconsistent with the original land use approval; 3. Exceeds the scope of the original land use approval; and 4. Can be made compatible with the zone for a period of up to sixty days a year; or*
- C. . . ."*

Per "Temporary Use Permit: General Information" published by KC DLS-Permitting:

"Temporary Use Permits (TUPs) are required when uses not otherwise permitted in a given zone can be made compatible for periods of limited duration and/or frequency, or to allow limited expansion of any use that is otherwise allowed in the zone but which exceeds the intended scope of the original land use approval (KCC 21.A.32.100)."

Event Centers and Carnation Farm's proposed events CANNOT be made compatible. They require better roads, sewer hookup and other urban infrastructure. They create noise, sully the atmosphere, and the Rural Area. They are not compatible with Rural Character. Most importantly, King County's own Comprehensive Plan, codes, and policies make it explicitly clear that such uses are not allowed in the Rural Area.

Again, per "Temporary Use Permit: General Information" published by KC DLS-Permitting:

"Temporary uses are limited to 60 event days occurring within a 365-day time period (one occurrence per calendar year) which begins on the date of the first event within a calendar year. The date upon which the use will be terminated and removed must be specified on the permit."

Finally, the concept of allowing **60 instances per year** of some 'activity' is NOT TEMPORARY. That is called "running a business." Less than 5 might be considered temporary. King County Code does NOT allow for urban-serving BUSINESSES to set up shop in the Rural Area. TUPs are just a giant loophole to allow *incompatible* urban uses in the Rural Area that violate multiple GMA and King County Policies.

Clearly, King County must REJECT Carnation Farm's application and, further, take the following steps to rein in the abuse by other "event centers" ongoing in the Rural Area:

1. Clearly DEFINE what "event center" means. It is currently undefined and open to whatever interpretation someone chooses. What is allowed at such "centers" (weddings, loud music, parties, more)? Why would such activities be allowed anywhere in the RA? How can they possibly comply with existing County codes and policies?
2. If any such facility were to be allowed (despite County codes clearly disallowing such uses in the RA) then the number of events and volume of attendees MUST BE STRICTLY LIMITED to a very few events per year for a very few number of attendees
3. There must be a MINIMUM 20-ACRE LOT SIZE required for such a facility.
4. All impacts to neighbors, roads, and the environment must be evaluated and MITIGATION MEASURES TAKEN before any such facility is allowed. These should include an extra road-use fee to compensate for the additional traffic put onto rural King County roads, which are already severely underfunded.
5. We urge King County DLS-Permitting to complete a study of existing "event centers," whether approved by TUP now or operating illegally, and to take action to SHUT DOWN THOSE NOT OPERATING PER PROPER APPROVALS AND CODE REQUIREMENTS. We can easily provide the names and locations of several of these.

In conclusion, we call for REJECTION of this application as a clear violation of all that King County seeks in protecting the Rural Area, our shared environment, and the rights of adjoining property owners to live in peace. To do otherwise would be in direct contradiction of all of the County's goals. Approving this also would continue to bolster a horrible precedent for more of the same. Please just say "NO."

() Joint Team: Enumclaw Plateau Community Association (EPCA), Friends of Sammamish Valley (FoSV), Greater Maple Valley Unincorporated Area Council (GMVUAC), Green River Coalition (GRC), Green Valley/Lake Holm Association (GV/LHA), Hollywood Hill Association (HHA), Soos Creek Area Response (SCAR), Upper Bear Creek Unincorporated Area Council (UBCUAC), and Rural Technical Consultants—Mike Birdsall (Transportation Focal), Ken Konigsmark (Growth Management Focal), and Terry Lavender (Environmental Focal).*

Peter Rimbos
Coordinator, Joint Rural Area Team--KCCP, CPPs, and VISION 2050
Greater Maple Valley Unincorporated Area Council (GMVUAC)
primbos@comcast.net