

Joint Rural Team

EPCA, FoSV, GMVUAC, GRC, GV/LHA, HHA, SCAR, UBCUAC

March 19, 2024

To: GMPC Members

The Joint Rural Area Team (JRT) (*) is aware of a desire by Harvolds in the City of Carnation to develop their highly productive farmland given its location within the Urban Growth Area (UGA). However, we feel it would be yet another tragedy of losing irreplaceable farmland to development if this land were lost. Harvolds have development rights which must be respected and compensated for. To do so, King County has the ability to preserve this land by purchasing the development rights with its Conservation Futures program in order to allow this land to continue to produce healthy, valued crops for our region.

As explained herein, we support the City of Carnation's request for a *reduced* future Growth Target, as we have done for all outlying "Cities in the Rural Area." We oppose the concept of converting the Harvold property to a residential development of up to 650 homes. We suggest other ways to meet needs of the property owner.

Agricultural Preservation

We cannot emphasize enough that the Snoqualmie Valley, in which Carnation sits, is prime agricultural land, a diminishing commodity that King County is committed to preserving. Converting a long-established berry farm to housing goes against that preservation goal. Recognize that the nutritious soils that give rise to agriculture here are the product of regular flooding of the Snoqualmie River over centuries, which leads to a discussion of that floodplain.

Floodplain

Floods happen regularly here and the Harvold property is in the Snoqualmie River floodplain. Putting substantial numbers of people in harm's way makes no sense, nor does increasing the number of high-value structures. Building in such areas only increases the pressure to put in *engineered solutions* to protect such developments placed on bad soils, in floodplains, all to the detriment of salmon, other species and decreasing the functions and values of the Snoqualmie River's habitat.

Unfortunately, there is a residential subdivision immediately north of the Harvold property, *outside* the City of Carnation, a development that, under present land-use codes, would *not* be approved, for all the reasons we present here for the adjacent Harvold property. We doubt future homeowners in that location would be able to insure their houses given the flood risk.

Traffic

The development of hundreds of new homes at the Harvold Farm would add thousands of new daily trips on SR-203 southward through Carnation and beyond, to the larger urban area to the west. This cannot be served by existing SR-203 without costly upgrades. The attached technical assessment indicates that level of service standards would likely be violated and the necessary mitigation would be a two-lane expansion of SR-203 through Carnation or an alternative new north-south street on the west side of Carnation. These would not be easily accomplished, and the cost would be shared between the development and the public. The attorney's for Harvold suggest an impact fee approach.

The Harvold attorneys also suggest higher transit feasibility with their proposed development. That requires input from Metro Transit, and leaves unresolved the majority of the development's traffic impact. All these concerns require careful analysis in the context of an update to the Comprehensive Plan – Transportation Element, following the guidelines of *RCW 36.70A.070(6)*.

We have included an **ATTACHMENT** with more detailed traffic impact review along with a map depicting options: **Likely Traffic Impacts of Proposed Development of the Harvold Farm A Preliminary Overview**.

Conservation Purchase of Development Rights

Purchase of the development rights should be investigated, *in lieu of* developing the Harvold property. We were all surprised to learn that Harvold's property was *inside* the UGA, but recognize there already was

development surrounding it. To preserve this property as a farm, Conservation Futures *could* play a role, assuming there is a buyer who wants to have a berry, vegetable, or flower farm. King County probably is the only entity that can negotiate something like that.

On February 11, 2023, on a similar issue elsewhere in Carnation, we wrote to you in support of conversion of three parcels from farming to urban. That was on the basis of a land exchange and the lack of other urban land in the Carnation UGA. That other situation was also in close proximity to the Tolt MacDonald Park, an urban-serving facility. We suggested Carnation could implement a Transfer of the Development Rights (TDR) program *within* the city, which would allow transfer of the property's development units to elsewhere in the city. Applying that concept to the Harvold Farm *could* achieve the result of protecting the farm and providing for housing in a more beneficial location.

We note also that Carnation is pretty much totally surrounded by farmland (with the development rights removed), floodplain, and critical areas—with no opportunity outside the city for 4:1 land preservation.

Conclusions and Recommendations

Given the floodplain issues, agricultural preservation issues, and traffic issues, we would have no problem with Carnation having a lower population target. It is small, bounded on all sides with undevelopable areas, and transit and jobs are a real long shot. It is 10-12 miles in any direction to the next "city," which is Duvall or Fall City. It has significant critical areas *within* the City. The amount of growth it can take is miniscule in the big picture of the region, but significant growth in Carnation would have a big adverse and would have a big impact on the Snoqualmie Valley.

We oppose converting the Harvold property to a residential development. If for some reason a conservation purchase of development rights isn't possible, then King County should urge the City of Carnation to minimize the loss of and impacts on the whole parcel by *clustering* any development into a small portion of the property, while leaving the majority of the acreage as "*community garden*," which could continue to allow the new residents and existing Carnation residents to have garden plots at their doorstep. Call it a "*4:1 program*" within the City, whereby development could be clustered on 20% of the land, while preserving 80%.

While affordable housing is a pressing *regional* need, there are far better places to meet that need that are: (1) out of floodplains, (2) out of the agricultural zone, and (3) closer to jobs.

() Joint Rural Area 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).*

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ATTACHMENT

Likely Traffic Impacts of Proposed Development of the Harvold Farm A Preliminary Overview

by
Michael Birdsall, (retired) Transportation Planning Engineer

As multi-family housing the proposed development of 550-650 homes would generate from 3,500 to 4,500 daily trips. This is about one-third fewer trips than if that many homes were built as single-family houses. This reduced level of trip generation corresponds to roughly one-fourth of the ultimate capacity of a two-lane arterial such as SR-203.

Most of this impact would travel south through Carnation to urban destinations via I-90 and Tolt Hill Road. Very few trip attractions are located north of Carnation. Existing traffic volumes on SR-203 in Carnation are at 10,000 to 11,000, with measurable congestion. Higher volumes will create additional congestion. The addition of thousands of additional trips would approach the ultimate capacity of that road (~15,000) and likely exceed it. Such high volumes would likely violate level-of-service standards of the City and WSDOT.

Mitigation of those significant impacts is possible, but costly. Two options come easily to mind, and there may be others:

- (a) additional lanes could be added to SR-203 through Carnation, or
- (b) a new road could be created from the site to NE 40th St in the alignment of Stewart Ave and Larson Ave, so as to bypass the city's congested highway corridor.

The map below depicts these two options.



This is a complex issue requiring further study. The development would use only part of the entire capacity of any additional lanes, but it is impossible to build just part of a road. The proper context for detailed

evaluation of the development's impacts, appropriate mitigation, and feasibility of implementation would be as an update to the city's comprehensive plan – transportation element, in accordance with RCW 36.70A.070(6).

Attorneys representing Ms. Harvold (P-R-K letter, March 12, 2025) argue that high-capacity transit would somehow become feasible in Carnation, if the city's growth target were retained at 799 and fulfilled with multi-family housing such as the Harvold proposal, rather than a lesser level of single-family housing. Assuming a very generous view of a transit-oriented future, the Harvold development proposal might at the very utmost justify something like four buses per peak hour between Carnation and the Redmond/Issaquah areas. Whether that additional service to Carnation would fit within the business plan of Metro Transit is up to that agency, and that calculation would be based on its fixed stream of sales tax subsidies and how best to allocate that subsidy. Even with higher transit service to Carnation as suggested, the majority of the traffic impacts of the development would remain. Overall, transit only accounts for about 5% of all travel countywide, leaving 90-95% served by cars and trucks. The need would remain for most of the road impact mitigation described above.

The Harvold attorneys also argue that the City should collect impact fees to account for traffic impacts and other facility impacts. True enough, as a general statement, but the City must follow the strict standards of RCW 36.70A.070(6) to establish such fees, and the general outcome is that new development is supposed to provide enough new road capacity to offset its additional traffic. As previously noted, that could amount to a substantial sum applied to this development alone, if the comprehensive plan transportation element establishes the need for a mile of new roadway between the north and south sides of the city, and the Harvold development pays for its proportional share thereof.

Finally, the attorneys argue that accommodating more growth in Carnation benefits the region's housing goals. The reality for traffic is that, in addition to requiring road improvements in and around Carnation, the new population would be adding an above-average amount of new vehicle-miles-of-travel (VMT) to the region's road system compared to the same development in the core urban areas. This could be from one-third to one-half more VMT than the average. This is in conflict with state law calling for reduction of VMT everywhere possible, to reduce climate impacts of motor vehicles.

Clearly, the regional interest for traffic systems, environmental protection, and climate action, is to minimize the amount of development in remote outlying cities like Carnation, not maximize it.