TO: Thurston County Board of Commissioners  
FROM: Thurston County Planning Commissioners Nickerson and Davis  
DATE: March 10, 2014  
SUBJECT: North Thurston School District UGA Amendment Request- Thurston County Planning Commission Minority Report  

Honorable Commissioners:  

The Planning Commission recently heard a request from the North Thurston School District (NTSD) for a site specific Comprehensive Plan amendment to rezone 72.09 acres from RRR 1/5 to Open Space/Institutional (OSI), and to amend the Urban Growth Boundary of the City of Lacey to include these 72.09 acres. At our March 5, 2014 work session, the Planning Commission voted 5-2 to recommend approval. This minority report is respectfully submitted to explain why some members of the Planning Commission feel this request should not be approved.

Our concerns are based on the following facts and policy considerations:

1) *Past Assumptions Driving Current Process.* The property was purchased by NTSD in 1996 with the intention to use it as a development site for future schools. This purchase was made 6 years after the GMA was promulgated into law and Thurston County’s Urban Growth Boundaries were established. The NTSD was aware that siting a school at this location was inconsistent with GMA rules and policy. Memoranda by NTSD at the time, as well as public testimony, clearly demonstrates the District knew that development of the site as a school would necessitate future expansion of the Urban Growth Boundary (UGB). Early concerns about the property purchase were also expressed by the Thurston Regional Planning Council (see letter dated May 16, 1996). From all of the information provided to the Planning Commission during our deliberation, it seems clear that a UGB expansion was ultimately considered a foregone conclusion. This is not proper planning under GMA, which requires thoughtful public process, particularly when expanding an urban growth boundary. Assumptions made in 1996 should not drive our current deliberations about whether the boundary should be expanded.
2) **Current Sustainability Goals.** Purchase of this site was done 18 years ago when the County’s population was significantly less, land was more abundant, and prior development policies were leading to urban sprawl. The County today has entirely different goals, needs and policies. These include encouraging housing density in urban areas, alternative and efficient transportation, making strategic capital investments toward more sustainable land use, as well as maintaining the character and high quality of life in the rural areas. The *Sustainable Plan for Thurston County* calls for a 21\textsuperscript{st} Century approach to community development. This would include more compactly designed schools and services located in higher density neighborhoods. The request to amend the UGA should be considered in light of these 21\textsuperscript{st} Century goals. If we do not begin now to implement these goals and policies with each decision presented, then when will we start the needed change towards sustainability?

3) **Consideration of Alternatives.** Staff informed the Planning Commission that no good alternative high school sites existed within the Urban Growth Area for Lacey. However, we were provided no significant analysis to support this assertion. (Upon request, staff did provide a cursory look at other available large parcels in the UGA. There were several, potentially with limitations, but we did not explore a detailed alternatives analysis.) We wonder if opportunities to collect mitigation fees and secure additional lands for a high school have been missed over the past 18 years because the NTSD already owned this large, rural-zoned property. Assertions that available lands within the UGA may have critical area issues or would need to be rezoned fall flat; the proposed site also hosts critical areas (wetlands) and would need to be rezoned.

4) **Site Limitations and Policy Inconsistencies.** We feel the wetlands on this site have not been given strong enough consideration with regard to rezoning from a rural use to an institutional use. The proposed site is also located on an arterial, which the Thurston County Comprehensive Plan clearly discourages for schools. County policies for expanding a UGB also call for “an overriding public interest” to be served. We question whether that is the case here.

5) **Proper Planning.** We are very concerned with a trend of school districts buying land outside the UGA where it is cheaper, and then asking for a Comprehensive Plan amendment after the fact. This is not planning. This is not the intent of the Growth Management Act, nor our local Comprehensive Plan.

An alternative to UGB expansion could be to keep the property in the unincorporated area and properly review a future special use permit application for a school when needed (NTSD asserted this may not be for another 10 years). We acknowledge that this proposed location could make sense as the school is intended to serve students from both rural areas and UGA. However, a school sited here could also be a new model for sustainability, for example, retaining a minimum forested area (e.g., 50 to 60%) to reduce stormwater runoff, and keeping the built areas to a minimum with 21\textsuperscript{st} century compact school designs. Representatives of the District stated they are interested in using natural areas at school sites for educational purposes. The site is forested and contains wetlands. It makes economic sense to keep these areas undeveloped for the unique recreational, educational, and environmental benefits they can serve the school and the region. A recent study\textsuperscript{1} of Thurston County’s natural lands indicates that the

\textsuperscript{1}Flores, L. et al. 2012. The Natural Value of Thurston County. Earth Economics. Tacoma, Wa.
County’s wetlands and forests provide several ecosystem services that a generate high economic value to the public, including education, aesthetic, and water quality benefits which are directly relevant to this site. The location of the property between the Nisqually and Henderson Watersheds supports these aspects, recognizing its position in the larger landscape, and the need for maintaining water quality (which can still be done with properly designed and maintained septic). This approach to developing the site would help buffer the residential neighbors, who voiced concerns at the early meetings in the 1990s, and at the Planning Commission’s public hearing on February 19, 2014. Finally, the property is in close proximity to Lacey’s Regional Athletic Complex, which could take some pressure off building large sports fields at the school.

These development principles could, of course, also be applied if the UGB is expanded. We understand that we are not at the stage of reviewing a particular development proposal. But proper planning means thinking ahead to how this site could potentially fit in with our local goals for sustainability. We believe that school districts, as with all government entities, should be leaders in sustainability, and should be held to very high standards when it comes to implementing the Growth Management Act.

Looking ahead, we would advise taking steps that would curb the trend of buying rural land, then asking for inclusion into the UGA. We hope that our local school districts will rethink their siting process, and properly collect mitigation fees and achieve development agreements that locate schools in areas already served by urban services, with high walkability scores, and potential for compact design. Improved siting and funding guidelines from the Superintendent of Public Instruction, new policies by local school districts to avoid buying lands outside urban growth areas, and consistent impact fee collection throughout Thurston County are areas of potential improvement towards that end.

Thank you for your consideration, and we are happy to speak with you further if you have any questions about our concerns.

Sincerely,

Donna Nickerson

Jennifer Davis, Vice-Chair