May 6, 2024

VIA ELECTRONIC MAIL

Michael Hubner
Long Range Planning Manager
Seattle Office of Planning and Community Development
600 4th Avenue
Seattle, WA 981104

OneSeattleCompPlan@seattle.gov

RE: Comments to Draft One Seattle Plan and DEIS

Dear Mr. Hubner:

Thank you for the opportunity to provide comments on the One Seattle Comprehensive Plan: Draft for Public Review ("Draft Plan Update") and the accompanying Draft Environmental Impact Statement ("DEIS"). The Seattle School District, No.1 ("School District" or "District"), which owns and operates over 100 schools and other properties within the City of Seattle ("City"), is pleased to support the Draft Plan Update process and offers the following comments.

Comments on the Draft Plan Update

As explained in Seattle Public Schools 2019-2024 Strategic Plan, "Seattle Public Schools is committed to eliminating opportunity gaps to ensure access and provide excellence in education for every student." As a general guide, any Comprehensive Plan goal in the Draft Plan Update should both acknowledge and reflect the SPS mission to provide a quality education for its students. The comments below are provided in light of this mission.

Annexation

While the School District has no specific comments on those parts of the Draft Plan Update that address potential annexation of unincorporated areas into the City, it would like to note that the District should be considered a key stakeholder in any future annexation process and should be consulted as part of the process described in Policy GS 11.2 to ensure any boundary-change agreements will not negatively affect the District's educational goals.

Public Facilities and Small Institutions

The School District appreciates the Draft Plan Update's recognition of the unique needs the District facilities face as public facilities that are often located in land use zones that are designed to address the needs of other land uses, such as single family homes. The School District supports the Draft Plan Update's inclusion of Goal LU G6 and the accompanying Policies LU 6.1-6.5.

Promoting Safe Travel for All

The School District shares the City's desire to provide safe routes to schools and other public destinations and the City's focus on the safety of people walking, biking, and rolling. We also support the inclusion of Goal TG 6 and its accompanying Policies, particularly Policies T 6.1, T 6.2, T 6.7, and T 6.8.

Public Schools Facilities

As noted in the Capital Facilities Element of the Draft Plan Update, the School District and the City have a long tradition of collaboration in planning for educational facilities that includes a joint use agreement for the sharing of recreation facilities and cooperative agreements for the Seattle Preschool Program. The School District appreciates the City's recognition of this relationship as warranting its own treatment within the Draft Plan Update and support the inclusion of Goal CF G6 which states: "Seattle has a system of well-resourced, zero-carbon emission school campuses that support high-quality instruction and learning experiences and meet the educational needs of a growing city." To maintain consistent terminology with the District's policy goals, we recommend the City revise this goal to replace words "zero-carbon emission school campuses" with the phrase "school campuses that make use of 100% clean, renewable energy and support…".

While the School District generally supports the Policies that accompany Goal CF G6 (i.e., Policies CF 6.1-.8) it is concerned that proposed Policy CF 6.8 could be misinterpreted as prioritizing the preservation of open space at the expense of SPS achieving its educational mission. To that end, SPS suggests that Policy CF 6.8 be reworded to prevent such future confusion. An example of such clarifying language could read "Encourage SPS to preserve and improve open space when modernizing or redeveloping school sites when balanced with SPS's educational program needs."

Access to Public Space

The School District supports the inclusion of Goal P G1 in the Draft Plan Update and those parts of Policy P 1.17 that state "Maintain and expand cooperative agreements with Seattle Public Schools and other public or private agencies to provide or expand access to open spaces they control." However, the District urges the City to reject the proposed portion of Policy P 1.17 that states "…and increase the tree canopy and green space they provide." While the District, like the City, recognizes the benefits of green space, the District is again concerned that the inclusion of references to increasing "the tree canopy and green space" could be misinterpreted as having higher priority than the District's educational mission. Although the District is an eager partner with the City in providing recreational opportunities for the students and the community at large, the Plan Update should not prioritize maintaining or increasing the tree canopy and green space on District property over the District's mission to educate students consistent with its educational goals and specification as provided through active recreation opportunities.

Youth Development and Arts Education

It should go without saying that the School District wholeheartedly supports giving "all students in all schools…the chance to learn through the arts" as stated on p.170 of the Draft Plan Update, and the District has obligations to do so under state law. However, the District would urge the City to remove the section of the Arts and Culture Element titled "Youth Development and Arts Education" from future versions of the Plan Update. While stating many laudable goals, this section relates to school operations that must comply with state law and is not appropriate for a land use planning document like the Comprehensive Plan.

Capital Facilities Appendix

The School District notes that at this time the Capital Facilities Appendix referenced on page 192 of the Draft Plan Update does not appear to be publicly available. Given this, the District would like to preserve its ability to comment on this Capital Facilities Appendix once it is publicly available given that the Appendix will specifically address the "inventory, capacity, and forecast of future need" for public schools.

Comments to the DEIS

Mitigation Measures for Plant and Animal Impacts

The DEIS twice mentions, on page 72 and page 309: "Collaborate with Seattle Public Schools and organizations such as Green Schoolyards America to increase tree cover on school grounds" as a potential mitigation measure regarding impacts on plants and animals. While the District welcomes continuing collaboration with the City to provide students and community members with access to parks and play areas, we again ask that such suggestions include language stating that such goals should occur when consistent with furthering the District's educational mission as defined by the District.

Similarly, where the DEIS references, on page 305, that adoption of proposed Policy P 1.17 is a means to increase tree canopy in the City, the District would reiterate its position, noted above, that any adopted version of Policy P 1.17 must include language clarifying that the District's educational mission is prioritized over tree canopy concerns on District property.

Mitigation Measures for Public Services Impacts

Similarly, two sections of the DEIS, pages 130 and 992, include a list of potential mitigation measures for impacts related to impacts on Public Services. These suggested mitigation measures include:

- City implementation of a school impact fee to help pay for new classrooms if needed in the future.
- City assistance in identifying interim uses for existing underutilized classrooms to ensure future availability for District use.

- City incentivization of vertical formats for new public schools in centers, including allowing greater heights at existing school locations, to protect recreation and tree canopy while allowing for more student classroom capacity.

- Updated development standards and review processes to facilitate classroom additions or construction of new, modern schools.

- Inclusion of enhanced street crossings, including walking routes to schools, in areas with added housing as part of development standards for new place types such as neighborhood centers and corridors.

- City identification of specific objectives to assist the District in acquiring and developing new schools if needed.

While the District appreciates the clearly collaborative intention of these suggested measures and their preliminary nature, the District cannot support the use of several of these potential measures to mitigate potential impacts of the Comprehensive Plan Update. The District's specific comments to each proposed mitigation measure are as follows:

- The District has not proposed the implementation of school impact fees within the City and would support deleting all references to school impact fees as the District does not recommend this option be pursued. Alternatively, should such references remain in the FEIS, the District requests the inclusion of accompanying language stating that the inclusion of impact fees as a suggested mitigation measure is not the result of District action or requests.

- It is unclear what City assistance in identifying interim uses for underutilized classrooms would include. To the extent that such efforts would support the District's educational mission, the District would welcome them. However, to the extent that such assistance would negatively impact the District's educational mission, it would object to it.

- As discussed above regarding plant and animal impact mitigation measures, the District objects to the formal designation of tree canopy protection as a goal independent of the District's educational mission. The District appreciates the recognition of the potential need to increase classroom capacity and the suggestion that vertical school formats may allow such an increase. However, the District would note that operational requirements and best practices for school design, especially elementary schools, often limit the ability to pursue more vertical school formats. Correspondingly, the District would discourage reliance on City incentives tied to the use of vertical school formats.

- The District strongly supports the inclusion of updated development standards and review processes to facilitate school capacities as potential mitigation measures for public services impacts.

- The District strongly supports the inclusion of enhanced street crossings, including walking routes to schools, in development standards for areas of expanded housing as potential mitigation measures for public services impact.

- It is unclear what City identification of specific objectives to assist the District in acquiring and developing new schools would include. To the extent that such efforts would support the District's educational mission, the District would welcome them. However, to the extent that such assistance would negatively impact the District's educational mission, it would object to it.

Mitigation Measures for Noise Impacts

On page 83, the DEIS states that:

> "Although mitigation measures are not required due to a lack of significant adverse impact findings, to reduce the potential for exposure of residences and other noise-sensitive land uses to incompatible environmental noise, the One Seattle Plan could consider adoption of a policy that recommends that residences and other noise-sensitive land uses (i.e., schools, day care) be separated from freeways, railways, ports, and other active industrial facilities where exterior noise environments exceed 65 dBA Ldn. If sensitive land uses are proposed in such areas, a policy addressing the need for additional mitigation strategies could be considered to achieve an interior noise performance standard of 45 dBA Ldn."

The District respectfully requests the City consult and collaborate with the District before pursuing any such noise mitigation measures that would impact District properties. While the DEIS states that no such measures are proposed at this time, the potential impacts to District operations and finances are quite significant. As such, the District seeks inclusion in any such future deliberations.

Estimates regarding Future School Needs

The District agrees with the statement, "[i]t is not possible to develop and accurate twenty-year projection of school needs given the wide variety of factors that influence these numbers and the recent fluctuations in public school enrollment." (page 124)

However, the District believes that readers might easily misinterpret another sentence on page 124 of the DEIS that states, "[b]ased on planning level estimates of students per school, there could be a need between 436-655 classrooms." The DEIS appears to have generated these estimated student numbers by assuming a direct linear relationship between the City's total population and the District's enrollment for the 2022-23 school year. This is not a recommended method of calculation for estimating future capacity needs. We accordingly recommend that the EIS clarify that the estimates are not a projection of capacity and instead is simply a planning model.

When the District conducts its 10-year student enrollment estimates, demographers at the District analyze a variety of data sources including the 2020 Federal Census, housing statistics, the historical relationship between birth rates and kindergarten enrollment, grade progression rates, student migration into and out of the District, and historical enrollment for the past decade. These analyses show that overall increases in housing and city population are not highly correlated with District enrollment. For example, while the addition of multi-bedroom affordable housing correlates with

enrollment gains in selected areas of the City, such gains are often offset by enrollment losses elsewhere in the City.

Birth trends, not overall City population, are the most reliable predictor of the District's overall enrollment trend. According to the 2020 Census, the City's population of residents between 25 and 40 years old has grown significantly. However, these gains have not resulted in either increased births or large net gains in District enrollment. Instead, the City's birth rates since 2016 have continued to decline and are unlikely to bounce back to the 2010-2016 levels in the foreseeable future. The District anticipates declining enrollment to continue for the next several years followed by a slight increase in K-5 enrollment within ten years. Given the complexities of calculating future school enrollment, the District respectfully requests that future versions of the EIS (1) omit calculations and estimates of classroom needs and (2) specifically note that overall increases in housing and population are not highly correlated with District enrollment. Thank you again for the opportunity to comment.

Sincerely,

Fred Podesta
Chief Operations Officer