

New Elementary School in North Redmond (NESNR) Comments to the Hearing Examiner

- **Introduction**

- Forrest Miller, Director of Support Service for LWSD
 - Address = 15212 NE 95th Street, Redmond WA 98041
- Thank you for allowing Lake Washington School District to provide comments regarding the Conditional Use Permit & Site Plan Entitlement for our new elementary school in North Redmond
- Background
 - Our school district faces a huge challenge in providing enough capacity (space) to house students. This year's student enrollment is 29,008 students. We have 1,178 more students than we had last year. For the past 2 years, we have grown 4% each year whereas other school districts around us have grown less than 2%.
 - 2 years ago we were the 6th largest school district in the state. Last year we were 4th largest. This year we have become the 3rd largest school district in the state. We believe that the current trend will continue & that the District may become the 2nd largest school district in the state within the next 2 years.
 - This growth is driven by local employers & commercial development.
 - As a result, the District has an urgent need to provide additional classroom space at all levels.
 - We currently have 27 elementary schools. 6 of those elementary schools are located in the City of Redmond – they are Audubon, Einstein, Mann, Redmond, Rockwell, & Rush elementary schools.
 - We are grateful for the support of the City of Redmond & for voters in the recent passage of our 2016 bond that provides for 8 school projects.
 - The new elementary school in North Redmond, along with the new elementary school in Redmond Ridge East are 2 of the 2016 school projects. Both are new schools & they are scheduled to open in the fall of 2018 as our 28th and 29th elementary schools.
- Specifically related to the new elementary school in North Redmond, we would like to focus on concerns about certain extraordinary staff recommendations (requirements) in the City's Technical Committee Report (TCR) to the Hearing Examiner. Those concerns center around the issues of: (1) on-site queuing; &, (2) the Transportation Management Plan (TMP).

- Both issues result in significant first cost impacts that put the new elementary school in North Redmond project over-budget.
- In addition, the issues also have significant operational impacts
- The District has a responsibility to be transparent to our citizens regarding project cost and budget/operational impacts
- **Issue #1: On-site Queuing**
 - **Requirement**
 - The TCR requires all (i.e. 100%) of the student drop-off/pick-up (both AM & PM) to be on site: To do that, 1,600 lineal feet of queuing is required. That is 3-6 times greater than other elementary school in our District
 - 1,600 lineal feet means 27,000 s.f. more of impervious surface than its parallel project of the same size & capacity – the new elementary school in Redmond Ridge East (located in King County).
 - Increased impervious surface also means increased storm water requirements.
 - The amount of on-site queuing required for a school is unprecedented in COR or any other jurisdiction within our district. It is even unheard of in other school districts
 - No other jurisdiction has minimum queuing storage requirements nor is there a demand to have 100% student drop-off/pick-up on any site
 - **Authority**
 - It is important to note that the City's TCR does not provide a code citation for requiring total on-site queuing.
 - In addition, this requirement is not supported by the traffic study
 - Our consultant, Chris Forster from TENW, will submit a memo, with comments to the record, that clarify the content of the traffic study & why, at the City's direction, they considered the worst case scenario for storage needs. You will see that those comments indicate that, while they considered the worst case scenario & identified storage recommendations based on that scenario, they did not specify where that queue should store. Rather, they identify that storage could feasibly occur partially off-site is commonly done in similar situations & schools.
 - We work with three separate transportation engineering firms on our District projects. None of these firms has seen a requirement

for 100% on-site storage for a school site for an elementary school project.

- In our view, it is not necessary to address impacts to NE 122nd Street & 172nd Ave NE because they are not significant and do not warrant 100% on-site queuing.
 - The reality is that the impacts would occur for only two short periods of approximately 15 minutes in the morning & 15 minutes after school. Plus, those impacts are limited to being only on school days. It is not an issue of traffic being lined up all day long.
 - The City Code provisions regarding TMPs identify the objective of reducing (note it does not say “eliminating”) A.M. & P.M. peak trips and **reducing** (not eliminating) single occupant vehicles.
 - We will have a TMP at this school and that should be sufficient for managing the traffic flow during these short periods.
 - Also note that there is required frontage improvements and new street parking. However, it is very likely that some parents will use this area and never enter the site.
 - Staff have alluded to churches and commercial businesses with drive-up services (e.g. a bank, McDonalds or Starbucks) being comparable to an elementary school. But schools are very different from churches or drive-up service businesses in terms of hours of operation and times of traffic impact. A school is very different from a commercial business with drive-up service which has:
 - (1) constant traffic throughout the day and year; &
 - (2) there is a need to queue on site to receive the drive-up service; &
 - (3) the need to limit traffic flow to these services.
- **Impacts of 100% on-site queuing**
 - We estimate that \$1.8 million of our \$9 million site costs is what it will cost for the additional 27,000 s.f. of impervious surface & increased storm water solutions which is driven by having all queuing and vehicle storage on-site

- Annual Storm Water Fees: An additional **\$5,000 annually** – this would impact operational costs taking money away from the classroom.
- **Issue #2: TMP**
 - The Technical Report **Requirement**
 - The District believes we currently have a well-functioning model TMP in place today in the City of Redmond as a result of a good collaborative effort between the City & the District and based on actual school operation experience. That model TMP has been replicated successfully at multiple sites.
 - We have great concerns regarding the City’s referenced revisions mentioned in the TCR in terms of the basis or authority for those revisions & the ongoing operational impacts that it will create for the District.
 - We spent time recently trying to reach agreement with City staff regarding **Condition IX(6)(c) on page 19** of the City TCR.
 - Unfortunately, we were unable to do so & request that the Examiner **modify that condition to only require the model TMP** currently in place at existing District schools in Redmond.
 - The **Model TMP**
 - As previously stated, the model TMP was developed collaboratively with the City in response to typical traffic related to schools.
 - Has been in place for 1 ¼ years (or 4 cycles of testing) and working well. (e.g. Audubon ES, Audubon ES, Mann ES, Redmond ES.)
 - District tracks public comments for each school in Redmond.
 - The District has not experienced any actual major issues. Rather, the concerns at schools with the model TMP traffic are primarily related to unique site conditions where students are using public pathways from cul-de-sacs when parents drop-off / pick -up their student(s).
 - The new elementary school in North Redmond does not have the potential for this type of conflict.
 - We believe that the Model TMP, developed collaboratively & operating effectively, should be implemented for this school.
 - The City’s draft TMP referenced in the Tech Report is not the result of collaboration between the City and the District

- The City has not provided evidence as to significant concerns with operation of the Model TMP or why it is no longer viable.
- **Conflict with City Queue Requirement and Code Provisions:**
 - Earlier I stated that the City is requiring the District to construct on-site impervious surface for 100% queuing of school drop-off & pick-up. Yet, at the same time, the City identifies, in their most recent draft TMP (not the model TMP), that the “Program Goal” in the new TMP is to “eliminate” vehicle queue spillover offsite.
 - First, this is not a requirement & not the stated program objective under the City’s Code authorizing TMPs.
 - Rather, **RZC 21.52.020** states the program objective to “implement a TMP to reduce the level of traffic generation during the a.m. & p.m. peak hours.”
 - **The City is using the TMP authority incorrectly.**
 - Second, if 100% on-site queuing is required to be constructed, why would a TMP be needed at all?
 - The City offers no evidence as to why this type of requirement is necessary and further no evidence as to why the onerous provisions in the August draft TMP make sense as applied to this school project.
- **Unprecedented**
 - No other LWSD jurisdiction (Kirkland, Sammamish or King County) requires TMPs for schools
 - Redmond’s draft TMP for the North Redmond school would have unprecedented requirements for short term impact use like an elementary school. Again, with only two times during a school day of approximately 15 minutes of traffic, it would include:
 - Eliminating all queuing impacts to streets
 - Require expensive multiple video monitoring events for potentially years after occupancy
 - Require additional measures/analysis if original assumptions change
 - We don’t believe that there is any evidence that would require such onerous measures.
 - The TCR cites boundary changes as an example and need to revisit the TMP. The District knows from experience that boundary changes do not tend to exacerbate traffic to & from a school. In fact, the purpose of a boundary change is

to better balance neighborhoods. A boundary change does not change the capacity of the school.

- Despite this actual experience, the City's draft TMP would leave us in a position where we would be subject to open-ended requirements & the potential for additional development conditions applied arbitrarily in the future. See page 19 of the TCR.
- **Impacts** to changing the model TMP
 - Operational impact (cost of monitoring) – i.e. \$17,000 per monitoring assessment per school & 3 times a year (a total of \$51,000) of operating budget that does not go into the classroom) until there are 3 consecutive results that are within tolerance limits and then the monitoring goes to once a year.
 - In addition, the draft TMP requires a police officer to help with traffic at the beginning of the year for 2 weeks. This school year, we have one school with a TMP that requires police officer for 1 week. The cost = about \$6,000 for one officer for one week. The proposed draft TMP wants to make this standard for all TMPs for 2 weeks at the beginning of each year (or \$12,000 per year). The cost is based on an officer's overtime rate and the required 4-hour call-out even if they are only needed for 15 minutes.
 - In addition, the new draft TMP calls for the District to provide enough staff required to control queueing. It is not possible for the District to be able to do this.
 - We will not able to comply because we would not be able to find people to hire for 15 minutes in the morning & 15 minutes in the afternoon.
 - Frankly, *it seems as though the City is setting the District up for failure.*
 - The constant shift of development approval required by the new draft TMP interferes with District educational planning and changes
 - Importantly, like the added storm water fees, these are operational dollars that would need to be from the classroom to the TMP program.
- **Traffic Impact Fees**
 - Traffic impact mitigation fees: \$250,000 for NENR - \$0 for RREES & RRMS
 - Why should schools have to pay for trips that have already been paid for by new homes?

- *Why should we be paying traffic impact fees when we are already providing off-site traffic improvements?*
 - Other jurisdictions have exemptions for school traffic impact fees (e.g. Bellevue and King County)
 - Or, allow these fees to be applied directly to the NESNR project
- At a minimum, the District will be asking for an independent fee calculation under the City's traffic impact fee ordinance to recognize the unique circumstances of the school development as a part of the infrastructure that is needed to serve the City's growth.

We ask respectfully that the Examiner consider carefully these items in the review of the Technical Committee Report & the Project conditions.

In summary:

- We ask to reduce/modify the queuing requirements consistent with other elementary schools in the City of Redmond (allowing for a combination of on-site and off-site queuing)
- We ask to use the model TMP at use in other elementary schools in the City of Redmond

Thank you again for the opportunity to share our concerns.

I would now like Mr. Chris Forster from TENW to present address the issue of on-site/off-site queuing that the project's traffic study.