Schools Sited Outside of Urban Growth Areas

Washington State Department of Commerce

Report submitted pursuant to Chapter 32, Laws of 2017 3rd Sp. Sess

GROWTH MANAGEMENT SERVICES

December 1, 2023

Report to the Legislature

Director Mike Fong

v3.4

Acknowledgments

Washington State Department of Commerce

Local Government Division

Growth Management Services Unit

Anne Fritzel, Housing Programs Manager

Benjamin Serr, Eastern Washington Regional Manager

Deanah Watson, Senior Planner

Research and Development Services Unit

Allan Johnson, Municipal Finance Section Manager

Alice Zillah, Research and Development Services Unit Managing Director

James Vogl, Research Analyst

Jordan Laramie, State Surplus Property Program Manager

Additional thanks to:

Benton County Planning Division

Bethel School District

Chelan County Community Development Department

Clark County Community Planning

Columbia County Planning and Building Department

Construction Services Group, Education Service District 112

Franklin County Planning and Building Department

Grant County Planning Division

Island County Planning and Community Development Department

Jefferson County Department of Community Development

Kitsap County Department of Community Development

King County Planning

Lewis County Community Development Department

Mason County Department of Community Development

Mead School District

Moses Lake School District

Municipal Research & Services Center

Northshore School District

Office of the Superintendent of Public Instruction

Pacific County Department of Community Development

Pend Oreille County Community Development Department

Pierce County Planning and Public Works Department

Skagit County Planning and Development Services Department

Snohomish County Planning and Development Services Department

Spokane County Building and Planning Department

Stevens County Planning Division

Walla Walla County Community Development Department

Washington Association of Education Service Districts

Washington State Department of Transportation

Washington State School Directors Association

Whatcom County Planning and Development Services

Yakima County Planning Division

LOCAL GOVERNMENT DIVISON
Mark Barkley, Assistant Director
Mark.Barkley@commerce.wa.gov

1011 Plum St. SE
P.O. Box 42525
Olympia, WA 985042525

www.commerce.wa.gov

For people with disabilities, this report is available on request in other formats. To submit a request, please call 360-725-4000 (TTY 360-586-0772)

Contents

Executive summary

The Legislature passed Chapter 32, Laws of 2017, which clarifies that nothing in Chapter 36.70A RCW prohibits "a county planning under RCW 36.70A.040 from authorizing the extension of public facilities and utilities to serve a school sited in a rural area that serves students from a rural area and an urban area," subject to certain conditions. Commerce prepared this legislative report in alignment with those requirements. Specifically:

> *"By December 1, 2023, [Commerce] shall report to the governor and the appropriate committees of the legislature about schools outside of urban growth areas that have been built, are under construction, or are planned as a result of the requirements of [Chapter 32, Laws of 2017 3rd sp. sess]. The report shall include the number, location, and characteristics of the schools; the number of urban and rural students served; and a cost analysis of schools built outside of urban growth boundaries."*

Project goals

This report identifies the number of schools built, planned, or under construction since 2017 and the passage of Chapter 32, Laws of 2017, and which:

- Are sited outside of urban growth areas (UGA);
- Serve students from both rural and urban areas; and
- Are served by an extension of public facilities or utilities.

It includes findings related to:

- Where the schools are located
- The schools' characteristics
- The number of students from rural and urban areas that these schools serve
- Cost analyses for schools built outside of UGAs, and factors that affect siting decisions

To accomplish these goals, Commerce conducted surveys of and interviews with planning and community development officials, school association representatives, and school district officials. Commerce also conducted geospatial analysis to aid in identifying schools that may have met the report criteria.

Key findings

Since 2017, 183 new schools were sited inside the UGA either on newly acquired sites or on existing land. Of the 26 schools sited outside of UGAs in this period, Commerce found only two schools that met all report criteria. Both schools are located in the Mead School District, on the same 64-acre parcel outside of the City of Spokane's UGA. These schools, Highland Middle School and Skyline Elementary School, serve students from both rural and urban areas, and are connected to services by an extension of public utilities.

Highland Middle School characteristics:

- **Opened**: 2020
- **Total cost**: $41 million
- **Size**: 120,000 square feet
- **Students enrolled in the 2021 -2022 school year**: 757
- **Proportion of students served that live in rural areas** : 75%

Skyline Elementary School characteristics:

- **Opened**: 2021
- **Total cost**: $24 million
- **Size**: 62,000 square feet
- **Students enrolled in the 2021 -2022 school year**: 358
- **Proportion of students served that live in rural areas** : 50%

In addition to these schools, Commerce found two schools sited near the boundaries of or outside of UGAs that did not meet all report criteria, but which exemplify some of the key factors that affect school siting decisions. The Case Studies section of the report provides details about each of these four schools.

Cost considerations:

Through interviews with subject matter experts and reviews of past research on school siting in Washington and school construction costs, Commerce identified 12 key cost considerations that may influence rural school siting decisions:

- Parcel availability
- Parcel size
- Parcel cost
- Site hazards
- Water utilities
- Sewer utilities
- Pedestrian and bike facilities
- Motorized transportation including school buses and private vehicle transportation
- Stormwater facilities
- Proximity to housing
- Shared use agreements
- Impact fees

Introduction

Urban growth areas

Urban Growth Areas (UGAs) are a community tool under the Growth Management Act (GMA)[1] to limit urban sprawl, protect agricultural and forest lands from development, and maintain rural character. Communities can primarily do this by limiting sewer and stormwater infrastructure and small lot sizes to within a UGA. An added benefit of concentrating development is that the capital and ongoing maintenance costs of infrastructure are sustainable. As development density decreases, the feasibility of maintaining public infrastructure at costs affordable to most people diminishes.

There are 29 counties in Washington that are "fully planning"[2] under the GMA, each of which must designate and periodically review UGAs as part of a public process that results in a comprehensive plan. Each UGA is the product of an analytical public process. Communities can customize the UGA to provide services and facilities without exceeding their financial limits. The infrastructure needed to serve schools are subject to the same capital and maintenance costs as the rest of the community.

Urban services and school siting

Communities plan for urban services—such as sanitation, sewers, drinking water, and stormwater systems, as well as schools and other facilities—based on a twenty-year planning period.[3] Property values outside of UGA boundaries appear lower-cost at the time of purchase compared to urban properties. However, low-density sprawl is less affordable over time based on the overall cost of building, repairing, and replacing urban services extended to remote locations.

For school districts that serve students from both rural and urban areas, rural sites near an urban growth boundary may be especially appealing and most suitable for accommodating students from both areas. When a district seeks a place for a new school, rural properties just beyond the UGA may be readily available and inexpensive real estate. Yet school districts contend with much more than property costs alone. A fully informed choice involves measuring potential savings against the expense of extending and maintaining urban services and other budgetary factors.

Under most circumstances, cities cannot extend public utilities outside of UGAs unless doing so protects the environment as well as basic public health and safety.[4] However, the GMA allows extension of urban services, such as sewer, to serve schools sited outside UGAs. Prior to the passage of Chapter 32, Laws of 2017, some school districts built on-site wastewater treatment facilities for schools sited outside of UGAs, while others abandoned proposed sites outside of UGAs in favor of urban locations due to a variety of factors, including proximity to students.[5] [6]

The up-front costs to buy or expand upon urban properties may be higher than an available rural site, but school districts also budget for transportation costs, which increase when busing students to outlying areas.

---

[1] RCW 36.70A
[2] RCW 36.70A.040
[3] RCW 36.70A.110
[4] RCW 36.70A.110
[5] RCW 36.70A.110
[6] King County, "King County School Siting Task Force: Final Report and Recommendations," (2012), https://kingcounty.gov/~/media/depts/executive/performance-strategy-budget/regional-planning/GrowthManagement/2012_SchoolSitingFinalReportAndRecommendations.ashx?la=en

This dynamic produces important trade-offs for communities to consider each time there are choices between sites equipped with urban services (at property prices reflecting the public investment) compared with sites that will require expanded services to support students at a rural school.

Methodology

Commerce pursued two research tracks to prepare this report to identify **key cost factors** and **case studies**. The results of this method provide background on cost considerations influencing school siting in rural areas . It also provides insight for schools that meet the report criteria defined by the report's authorizing mandate in Chapter 32, Laws of 2017.[7] Both tracks involved research questions based on content in the report mandate, such as:

- How many schools are planned, under construction, and/or have been built outside of UGA boundaries as a result of the 2017 legislative changes?
- Where are these schools located?
- Are these schools served by an extension of public facilities from inside a UGA?
- What are the schools' characteristics, including how many (urban and rural) students do they serve?
- What can be identified as decision-making factors and cost considerations to site a school outside versus within UGA boundaries?

These baseline questions provided guidelines for topic scope and served a starting-point from which the research team could expand where necessary to provide context or highlight relevant information.

Methodology: Key cost factors

Commerce determined key cost factors affecting rural school siting based on relevant studies, past planning efforts across the state and other sources regarding rural school siting, and construction costs. This included sources from the United States Environmental Protection Agency[8] as well as sources from other states including California[9], Maine[10] and Oregon.[11]

Commerce then interviewed stakeholders to investigate the decision-making factors that influence whether a school district will locate a school outside UGA boundaries. An examination of individual case studies followed along with additional research to build upon staff knowledge and refine our findings.

Methodology: Case studies

Commerce surveyed subject-matter experts, including local planning officials and statewide school associations, and conducted GIS analysis to identify schools that might meet the report criteria. Commerce began by identifying schools sited outside of UGAs since 2017 and then identified schools from that list that serve students from both rural and urban areas and are served by an extension of public utilities.

---

[7] RCW 36.70A.213 (2017), https://leg.wa.gov/CodeReviser/documents/sessionlaw/2017pam3.pdf
[8] Environmental Protection Agency, "School Siting Guidelines," (2011), https://www.epa.gov/sites/default/files/2015-06/documents/school_siting_guidelines-2.pdf
[9] California Department of Education, "School Site Selection and Approval Guide," (2023), https://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp
[10] Maine Department of Education, "Major Capital School Construction Programs," (2023), https://www.maine.gov/doe/schools/facilities/mcscp
[11] Oregon Transportation and Growth Management Program, "Planning for Schools & Liveable Communities, the Oregon School Siting Handbook," (2005), https://www.oregon.gov/lcd/Publications/schoolsitinghandbook_2005.pdf

Commerce contacted planning or community development departments in the 29 fully planning counties and received responses from 22 of those counties. Of these 22 counties, only three identified schools sited on or outside of urban growth area boundaries since 2017. Only one of these schools also met the additional report criteria, however.

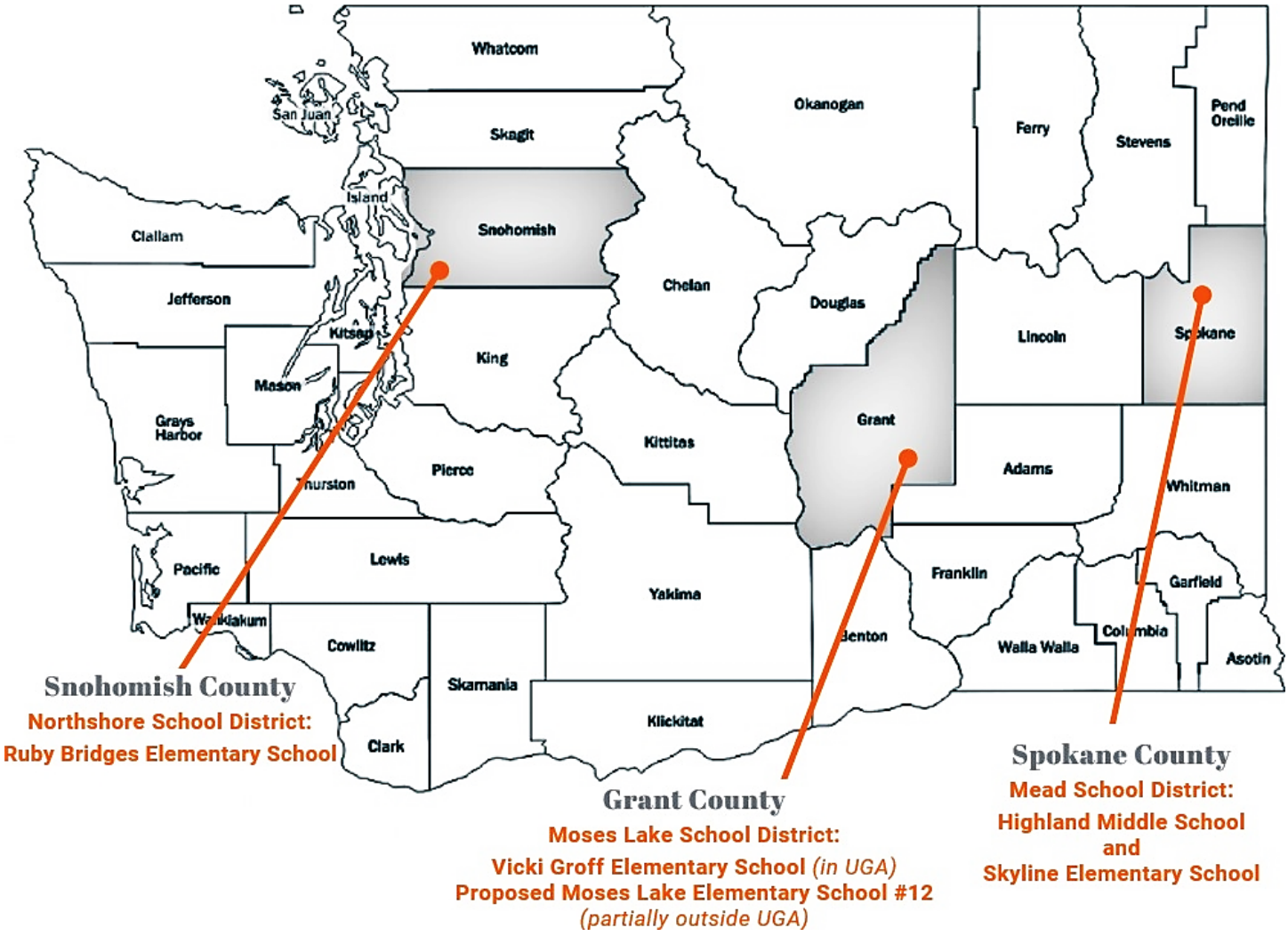
Moreover, Commerce reached out to the Washington State School Directors Association (WSSDA) and the Washington Association of Education Service Districts (WAESD). WSSDA agreed to inquire with its members if they were aware of any schools in their districts that may meet the report criteria. Commerce received three responses from this survey, one of which identified a school sited outside a UGA since 2017.

WAESD referred Commerce to several contacts with deep knowledge of school siting across the state, including its construction services group (CSG). CSG, housed in Education Service District 112, provides a variety of capital project support services to school districts statewide. WAESD's contacts helped Commerce identify several schools sited outside urban growth areas since 2017.

In addition to these survey efforts, Commerce overlaid OSPI construction data from its Inventory and Condition of Schools (ICOS) system with a state GIS layer containing UGAs to identify new construction in rural areas since 2017. The ICOS system only contains data on school capital projects that received state funding, or voluntarily reported data. Commerce conducted further research on schools it identified outside of urban areas to filter out replacement or renovation projects on existing rural sites, or schools that only serve rural students.

Case studies

Figure 1: Four case studies from Grant, Snohomish, and Spokane



Overview

The following case studies feature two schools from Spokane County, which Commerce found to meet all the criteria established for this report. Both schools are located in the Mead School District and were built outside of UGA boundaries since 2017. They also serve students from rural as well as urban areas and are connected to services by extension of public utilities.

Commerce identified two other schools fulfilling only part of the research criteria for constructed facilities and included them within the following case studies. The examples feature elementary schools from Grant County's Moses Lake School District and Snohomish County's Northshore School District. Theyprovide insight into factors that dis tricts consider in the decision to site schools serving urban and rural student populations either inside or outside UGA boundaries.

Construction data

In addition to the newly built or proposed schools featured in case studies of this section, OSPI provided data for this analysis that combines construction of new schools with other construction projects. Since 2017, school districts have undertaken a total of 235 school building construction projects, 26 of which were

projects beyond UGAs and 209 were for projects located within UGAs. These totals aggregate new-builds with other construction activities, including facility expansions or repairs.

Based on OSPI data, four schools have been built just beyond UGA boundaries since 2017. However, it is not clear whether these schools were built **as a direct result of** the legislative changes that clarified conditions for extending urban services for rural schools.

In addition to data analysis pertaining to school construction, Commerce directly contacted sch ool district officials to verify findings and collect more detailed information to contextualize each case study.

Four case studies

- Spokane County, Mead School District: Highland Middle School
- Spokane County, Mead School District: Skyline Elementary School
- Grant County, Moses Lake School District: Moses Lake Elementary School #12
- Snohomish County, Northshore School District: Ruby Bridges Elementary School

Spokane County case studies: Mead School District

Highland Middle School and Skyline Elementary School

In 2018, Spokane County voters approved a $114.5 million bond proposition to finance the construction of a new middle school and elementary school, among other capital improvements. These proposed schools became Highland Middle School and Creekside Elementary School. Creekside is located inside the urban growth area, northeast of the Highland site, across US Highways 2 and 395. In the process of building Creekside Elementary School, the district acquired 16 lots in order to have enough land to accommodate the school. Creekside sits on 11.4 acres and is 66,000 square feet in size.

During construction planning, the district decided to extend public utilities to the Highland site knowing that it might also become the site of a second new school, which could utilize this new infrastructure. While the bond proposition did not include a proposal for two new elementary schools, the Mead School District received more state School Construction Assistance Program funds than it anticipated for the Highland project, allowing it to finance the construction of Skyline Elementary School.

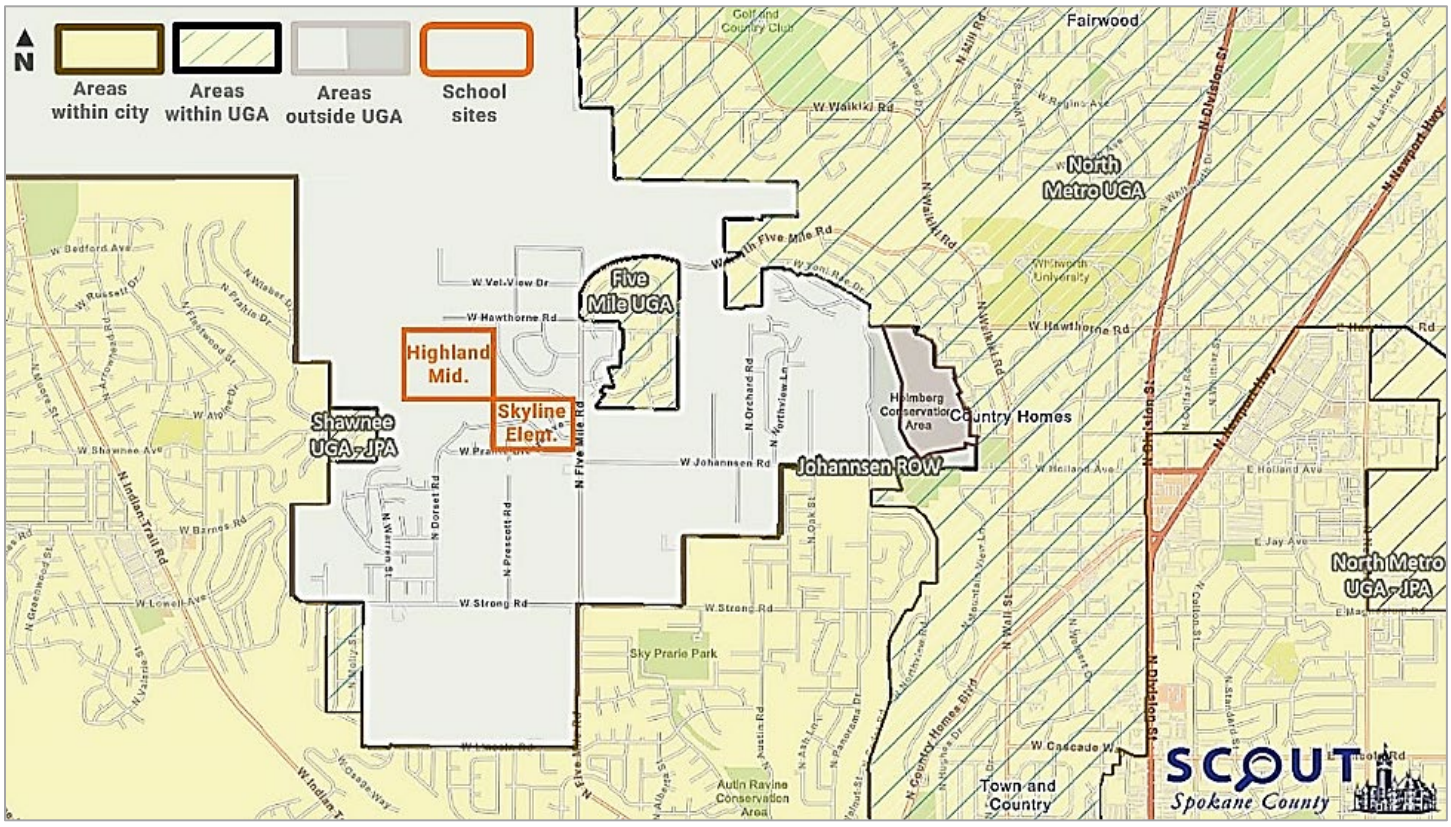
Highland and Skyline are located outside of the City of Spokane UGA. Both schools are connected to public utilities and serve students in urban and rural areas. The district's decision to site Highland Middle School and Skyline Elementary School in the Five Mile Prairie area, near Spokane, was influenced by increased residential development and growing enrollment in the area, and the greater ease of purchasing sufficient land outside the urban growth area.

Prior to the construction of these schools, the district was busing 60 to 70 students from the Five Mile Prairie neighborhood to neighboring Farwell Elementary School, about five miles away from the current location of Skyline Elementary School.[12] By building the two new schools in Five Mile Prairie, one of the objectives of the district was to reduce these busing miles.

[12] Mead School District, email correspondence, (2023)

Figure 2. Highland Middle School and Skyline Elementary School in Spokane County

Figure 3. Mead School District sites located outside of the City of Spokane's Urban Growth Area



Highland Middle School, 120,000 square feet in size, opened in 2020, and Skyline Elementary School, 62,000 square feet in size, opened in 2021. The total costs for these schools were $41 million and $24 million, respectively. According to the National Center for Education Statistics, 757 students enrolled at Highland

Middle School during the 2021-2022 school year, and 358 students enrolled at Skyline Elementary School during the same period, with capacity to serve up to 600 students in the future.[13] [14] The district estimates that 75% of students enrolled at Highland and 50% of students enrolled at Skyline live outside of the Spokane UGA.

The district considered several sites for Highland and Skyline, but struggled to find a large enough parcel inside the UGA. Highland and Skyline sit on the same 64-acre parcel, just outside of the UGA.

Grant County case study: Moses Lake School District

Moses Lake Elementary School #12

The Moses Lake School District is currently in the process of acquiring a 14-acre lot for a proposed elementary school in the Mae Valley, just west of the Moses Lake UGA. Part of the district's interest in proposing a new school in the Mae Valley is to reduce busing miles for an area where residential development has increased. The district currently buses more than 300 students out of the area to other schools, and these trips include highway miles. New development in the Mae Valley area includes a new 57-lot subdivision contributing to busing miles in a trend that the district expects will continue.[15]

The school district, in consultation with the City of Moses Lake, identified the Mae Valley location as a possible site for a new elementary school - Moses Lake Elementary School #12 - while it was in the process of siting and building Vicki Groff Elementary School. Moses Lake Elementary School #12 would serve 450 students and could serve up to 750 students, if needed, to accommodate future growth.

Figure 4. Moses Lake Elementary #12 and Vicki Groff Elementary in Grant County

[13] National Center for Education Statistics, "Highland Middle School," (2023), https://nces.ed.gov/ccd/schoolsearch/school_detail.asp?Search=1&DistrictID=5304920&ID=530492003767

[14] National Center for Education Statistics, "Skyline Elementary School," (2023), https://nces.ed.gov/ccd/schoolsearch/school_detail.asp?Search=1&Zip=99021&Miles=10&SchoolPageNum=2&ID=53049200377_9

[15] Columbia Basin Herald, "Refuge at Mae Valley," (2023) https://columbiabasinherald.com/news/2023/feb/10/refuge_-mae-valley/

Figure 5. Proposed Moses Lake Elementary School #12 in the City of Moses Lake

The proposed site for Moses Lake Elementary School #12is situated partly inside and partly outside the UGA. According to the district, the property owner plans to subdivide the parcel and seek an amendment to the UGA in a process to bring the entire site into the UGA.

The district intends to acquire the portion of the parcel outside of the UGA to serve as ballfields for the proposed school. This would bring the portion of the lot that is currently beyond the UGA inside of it. The district hopes to close on the property by the end of 2023 and begin construction in 2024.

Snohomish County case study: Northshore School District

Ruby Bridges Elementary School

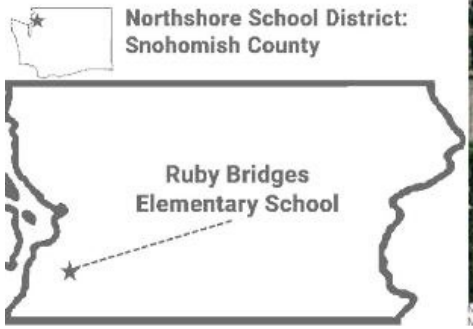
Completed in the fall of 2020, Ruby Bridges Elementary School is located in Woodinville, just outside of the Bothell unincorporated UGA Funded by a $275 million bond proposition approved by voters in 2018,the school was built to ease overcrowding in other schools in the Northshore School District, at a total cost of approximately $65 million.

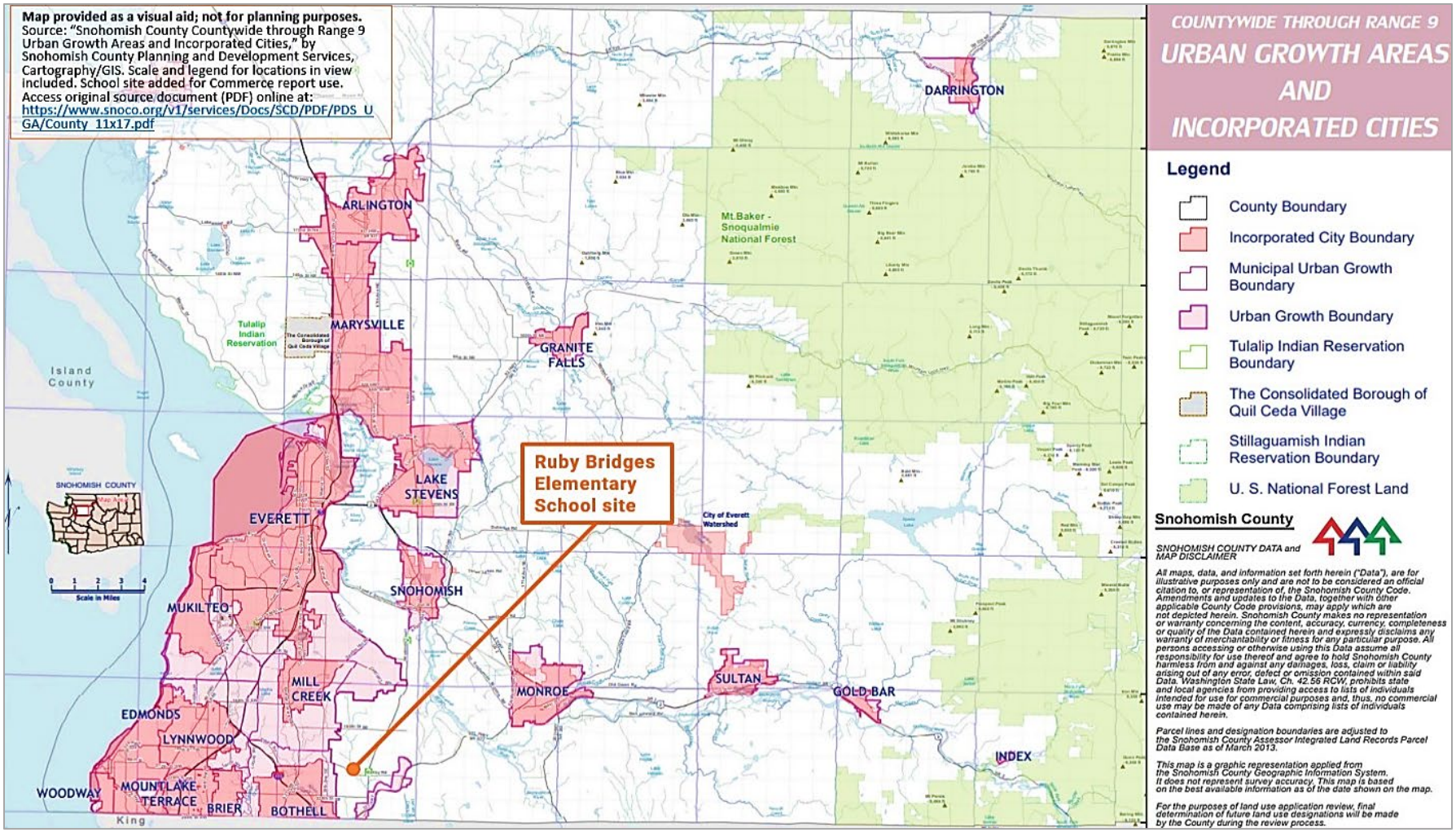
Ruby Bridges Elementary School is approximately 76,000 square feet, and was designed to serve around 500 students. According to the National Center for Education Statistics, 474 students enrolled at the school during the 2021-2022 school year.[16] However, the district provides that it is unknown how many of these students live outside the UGA and how many students live inside it.

The school does not have a sewer connection, operating a large septic system on-site because the site is outside the UGA, and sufficiently distant from any planned sewer extensions by the Alderwood Water and Wastewater District. If the UGA were extended in the future, and include the site of Ruby Bridges, then the septic system may eventually be changed to a sewer extension.

[16] National Center for Education Statistics, "Ruby Bridges Elementary School," (2023), https://nces.ed.gov/ccd/schoolsearch/school_detail.asp?Search=1&Zip=98072&Miles=10&ID=530591003746

Figure 6. Ruby Bridges Elementary in Snohomish County | Figure 7. School Site and UGA Boundaries





Key cost factors

Cost analysis of Key Factors

Based upon review of the case studies and through interviews of key stakeholders, there appear to be12 key factors that play into the cost of construction and ongoing operation , and affect the decision whether to site all or part of a school facility in a rural location:

- Site Availability
- Site Size
- Site Cost
- Site Hazards
- Water Utilities
- Sewer Utilities
- Pedestrian and Bike Facilities
- Motorized Transportation
- Stormwater Facilities
- Proximity to Housing
- Shared Use Agreements
- Impact Fees

Some of these factors, like parcel costs, provide strong incentives to school districts to site new facilities in rural locations; however other factors, such as the extension of urban services and facilities, create costs and impacts that can offset those incentives and make development within the urban growth area often the preferred alternative, based on overall lower costs.

This analysis provides a broad overview of the factors that stood out among many and this discussion attempts to put into contrast the magnitude of these factors. It is does not provide an in-depth analysis, which must be ascertained on a case-by-case basis.

Interviews and data analysis

To understand the range of cost factors that affect the decision whether to site a school in a rural setting better, we held eight interviews with stakeholders in July and August of 2023. These interviews included discussion with the following:

- King County
- Municipal Research and Services Center
- Office of the Superintendent of Public Instruction
- Washington State Department of Commerce
- Washington State Department of Transportation
- Washington State School District Association

Topics that we discussed at length included water rights, climate change planning, use of impact fees, and safe routes to schools. These interviews helped inform the analysis of key cost factors affecting school siting decisions.

Site size

Perhaps no other factor is more important to the suitability of a potential new school location as the size of the facility and the land that must be secured for it. WAC 392-342-020 sets forth advisory guidelines for the minimum size of school facilities. These guidelines suggest a minimum of five usable acres for an elementary school and 10 usable acres for a middle or senior high school. An additional five useable acres is recommended for every 100 students at maximum enrollment levels, though not required.

With an average enrollment of about 400 students, that sets the minimum recommended size for an elementary school at 25 acres.[17] A directory of Washington high schools provides that High schools average approximately 800 students and therefore have a minimum recommended average size of 55 acres based upon the guidelines in the WAC.[18] Importantly, enrollment in a particular school may vary significantly higher or lower than these statewide averages.

These average size requirements result in the need for a parcel that could otherwise accommodate 150-330 homes (at six gross units/acre) or 450-990 apartment units (at 18 gross units/acre). Sites of this significant size are becoming harder to find within a number of urban areas throughout the state.[19] [20]

Rural sites often provide an advantage over urban locations when searching for sites of sufficient size because larger parcels and undeveloped sites tend to be more readily available outside of urban growth areas. School districts may face constraints in securing sites of sufficient size for a new facility in urban locations.

One method that school districts can consider is opting for a smaller site within urban growth boundaries. WAC 392-342-020 allows for siting new facilities on sites smaller than the minimum guidelines if:

- (a) The health and safety of the students will not be in jeopardy;
- (b) The internal spaces within the proposed facility will be adequate for the proposed educational program;
- (c) The neighborhood in which the school facility is or will be situated will not be detrimentally impacted by lack of parking for students, employees, and the public; and
- (d) The physical education and recreational program requirements will be met.

There are a number of ways to reduce school size including:

- Constructing multi-story facilities;
- Creating shared use agreements with adjacent community facilities such as parks or community centers;
- Developing shared facilities or integrating new schools within larger developments;
- Utilizing subterranean or structured parking; and
- Redeveloping existing facilities or locations.

Some of these approaches, such as shared use agreements, can help reduce the overall cost of development while others, like multi-story construction or structured parking will likely result in increased facility costs. In

---

[17] National Center for Education Statistics, "Digest of Education Statistics, Table 103 Public Elementary Schools by grade span.., 2008-09," (2023), https://nces.ed.gov/programs/digest/d10/tables/dt10_103.asp
[18] High Schools.com, "Washington High Schools," (2023), https://high-schools.com/directory/wa/
[19] Reason Foundation, "A Line in the Land: Urban-growth Boundaries, Smart Growth, and Housing Affordability," (1999), https://reason.org/wp-content/uploads/files/c5ba9be86e1bda65352dcf0e87a46c5a.pdf
[20] Pacific Research Institute, "U.S. Land Shortage is a Result of Artificial Growth Limits," (2022), https://www.pacificresearch.org/u-s-land-shortage-is-result-of-artificial-growth-limits/

some cases, these costs may double for multi-story facilities with subterranean or structured parking based upon recent estimates of construction costs.[21]

Site availability

In the absence of an existing location that can be renovated or rebuilt, one of the first tasks upon siting a new school facility pertains to an inventory of sites that are currently owned or available for purchase (or in rare cases through condemnation) by the school district. Even when new school facilities can be reduced in size, it is possible that the district could encounter difficulty identifying adequate vacant or underdeveloped sites. The relative abundance of larger parcels and potential development sites in rural locations may result in the district considering multiple sites in rural areas compared to fewer sites within the urban area.

While the ratio of sites within urban areas versus rural areas may not directly affect the cost of the development of each site, it can affect the final construction decision if no suitable sites are located within the urban area.[22]

A significant number of school districts own lands in rural areas and many of these assets were purchased prior to the change in the law regarding rural school siting. In these locations, the existing ownership of property provides a strong incentive for the district to utilize that location, even if it is outside of the UGA.

Site cost

Sites outside of UGA boundaries appear more affordable when excluding the costs inherent in extending urban services. The base property cost of a rural site is generally lower when compared to sites within a UGA where urban services are already available nearby. This forms an initial preference for communities to seek prospective school sites outside of UGA boundaries.

While the actual cost ratio varies by location, research indicates that rural sites may be secured for 10% to 50% of the cost of a comparable parcel located within urban growth boundaries.[23] [24] [25] This price differential can create a strong motivation for districts to look to rural sites as the possible location of a new school.

This initial preference for rural sites can be more pronounced when a school district already owns property outside of a UGA. Districts in this position need to weigh site-specific alternatives to determine which sites offer the most feasible financial option. They must determine whether it is more beneficial to either pay for extending public facilities and services to their rural site or to leverage assets and acquire new property at a site where the community already concentrates such public investments.

---

[21] Tom Scalisi, Levelset "2022 Guide to US Building Commercial Construction Cost per Square Foot," (2022), https://www.levelset.com/blog/commercial-construction-cost-per-square-foot/

[22] Office of Superintendent of Public Instruction, "Summary Report: First Summit on School Planning and Siting in Washington," (2007), https://web.archive.org/web/20120906001855/https://www.k12.wa.us/schfacilities/publications/pubdocs/summitschoolsitingreportmay2007.pdf

[23] Shishir Mathur, *Housing Studies*, "Impact of Urban Growth Boundary on Housing and Land Prices: Evidence from King County, WA", (2014), https://www.researchgate.net/publication/261857272_Impact_of_Urban_Growth_Boundary_on_Housing_and_Land_Prices_Evidence_from_King_County_Washington

[24] Wendell Cox, Newgeography, "The Costs of Smart Growth Revisited: A 40 Year Perspective," (2011), https://www.newgeography.com/content/002324-the-costs-smart-growth-revisited-a-40-year-perspective

[25] Scott Latta, Modern Farmer, "Portland's Urban Growth Boundary Plots City Versus Country," (2016), https://modernfarmer.com/2016/09/portland-urban-growth-boundary/

Site hazards

When evaluating potential sites, districts consider factors that could affect the safety of students and faculty as well as the structures themselves. These potential hazards include tsunami zones, seismic hazards, potential landslide locations, and areas at risk for wild fire.

Other natural features that can limit the usability of a site include the presence of water features, wetlands or steep slopes. The presence of any of these encumbrances will affect the planning and placement of buildings, parking, play areas, and ballfields, and may render large portions of the site undevelopable.

While these encumbrances may occur on urban sites that are undeveloped or underdeveloped, they tend to be more prevalent in rural settings. This happens in part because communities excluded locations prone to significant hazards from the urban area during creation of their urban growth areas. In addition, some communities designate urban areas constrained by natural hazards for low-density development.

As a result, significant portions of large rural sites, or urban areas with low-density zoning, may not be usable for development of new school facilities. If half of a site has natural hazards, then the net price of the usable land is effectively increased and perhaps doubled.[26]

Water utilities

The provision of water to a rural location can result in significant added expense to the development of a new school facility. With recent water rights decisions, it is more likely that a school would need to connect to an existing water system rather than establishing a new well.[27] [28] Individual water rights are rare and expensive to get in most locations throughout the state.

Water system extensions can become quite expensive as current estimates place costs at $75 to $225 per linear foot. Thus, a half-mile water main extension could add up to $594,000 to the cost of a new school.[29] The alternative cost of a private well could not be ascertained for this study.

Sewer utilities

Somewhat similar to water mains, sewer mains can cost $50 to $200 per linear foot. This can result in significant development costs. At these rates, a half-mile extension would cost up to $528,000.[30] [31] This additional cost assumes that the school would not, or could not, utilize a septic system where sewage flows into a detention chamber and outflows to a drainage field. While utilizing a septic system would involve some costs reducing the net financial impact, we anticipate that approach to be significantly less than extension of

---

[26] Teri Shore, Greenbelt Alliance, "What are Urban Growth Boundaries and Why Do We Need Them?," (2020), https://www.greenbelt.org/blog/what-are-urban-growth-boundaries-need/

[27] Washington State Department of Ecology, "Hirst Decision," (2023), https://ecology.wa.gov/Water-Shorelines/Water-supply/Water-rights/Case-law/Hirst-decision

[28] Municipal Research and Services Center, "Water Rights," (2023), https://mrsc.org/explore-topics/environment/water-topics/water-rights

[29] Fixr, "Main Water Line Installation Cost Guide," (2022), https://www.fixr.com/costs/main-water-line-installation

[30] Alliw Ogletree, Angi "How Much Does Sewer Line Installation Cost? [2023 Data]," (2023), How Much Does It Cost to Connect to Public Sewer? [2023 Data] | Angi

[31] Alexis Carthan, This Old House, "What is a Sewer Line Replacement?," (2023), https://www.thisoldhouse.com/plumbing/reviews/sewer-line-replacement-cost#:~:text=Typically%2C%20you'll%20pay%20between,extra%20expenses%20to%20your%20project

sewer.[32] Use of an on-site treatment system, which provides localized sanitary sewage treatment, is more expensive and would tend to even out cost differentials.[33]

Septic systems will have ongoing costs associated with periodic emptying of the detention tanks. However, dead-end tightline sewers would also result in some ongoing costs, especially during summer breaks, as they need to have water running frequently to avoid stagnation, plus monthly fees to the sewer provider.

Sewer costs appear to be one of the deciding factors that led the Central Valley School District (CVSD) in Liberty Lake, Washington to pick a site located within the urban growth area over several rural locations. The CVSD conducted an analysis of four sites with three of those locations being in rural areas. They estimated sewer costs to the rural locations at $600,000 to $750,000 in 2020. While the overall costs of the all three rural locations exceeded the urban location, sewer was one of the most significant costs found in the analysis.

Pedestrian and bike facilities

On average, an estimated 10% to 20% of students either bike or walk to school. The ratio of students walking decreases at distances more than a quarter-mile from the school while biking ratios decrease at distances between one to three miles.[34] [35]

In urban locations, students use the existing network of roads and sidewalks to access schools by foot or bike. These networks are typically limited in rural settings. In cases where schools are located in rural areas, the ability to create a new network is constrained and facilities typically become restricted to one, or a few, linear routes. Typically, new sidewalks and bike paths are required to provide access for students to travel to and from the school by non-motorized transportation. These generally must be newly installed facilities as they are considered urban facilities and would not otherwise be allowed in the rural area. The Washington State Department of Transportation generally estimates costs for these improvements at $1 million per mile.

The linear configuration of bike and pedestrian routes to rural school locations can increase traffic levels and hazards along the pedestrian and bike routes, requiring greater hazard mitigation measures such as roundabouts and added traffic signs and signals. This may result in significant added traffic mitigation costs.

In addition, because the ratio of students living within a quarter-mile of the school in a rural area is significantly lower than in an urban location, it is likely that there will be an increase in students that utilize buses or personal vehicles for transportation to and from school.

The Washington State Department of Transportation provides grants through the Safe Routes to School Program (SRTS) to improve safety and mobility for children, encouraging more walking and biking to school.[36] Siting schools closer to urban areas is consistent with many of the program's primary objectives, such as ensuring children have buffered bike lanes and other bicycle facilities along with pedestrian facilities that

---

[32] Premier Tech Water and Treatment, "Septic or public sewer, which is better?," (2023), https://www.premiertechaqua.com/en-us/wastewater/septic-system-vs-public-sewer

[33] University of Tennessee, Knoxville, "Rural School Wastewater Treatment System," (2016), https://trace.tennessee.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=3034&context=utk_chanhonoproj

[34] Office of the Superintendent of Public Instruction "School Walk and Bike Routes: A Guide for Planning and Improving Walk and Bike to School Options for Students," (2015), http://wtsc.wa.gov/wp-content/uploads/dlm_uploads/2014/09/SchoolWalkBikeGuide_TechnicalUpdate.pdf

[35] Everett Jones S. and Sliwa S., Centers for Disease Control, "School Factors Associated with the Percentage of Students Who Walk or Bike to School, School Health Policies and Practices Study," (2016), https://www.cdc.gov/pcd/issues/2016/15_0573.htm

[36] Washington State Department of Transportation, "Safe Routes to School Program," (2023), https://wsdot.wa.gov/business-wsdot/support-local-programs/funding-programs/safe-routes-school-program

include sidewalks and crosswalks along school routes. In turn, these bicycle and pedestrian facilities help "improve personal health, wellbeing, and community connection; reduce traffic congestion; and protect the environment."[37]

While schools in rural settings may apply for SRTS grants, urban areas are generally more consistent with the program's objectives and award criteria.[38] It is not clear whether this factor plays a part in decision-making when choosing between an urban and a rural location.

Motorized transportation

As the distance between student and school increase, the use of motorized transportation goes up and continues to climb with additional distance. Having students located close to schools reduces the average vehicle miles traveled per household over the lifetime of the facility. Busing and motor vehicle traffic create lifetime costs for the project and thus are higher for schools located at a greater average distance from the student.

Schools located in rural areas are usually located at a greater average distance from student homes compared to those located within urban areas. As a result, busing expenses can be greater for the district at rural locations than at urban sites. It also can result in added parking and drop-off/pick-up facilities. For example, if the number of non-motorized trips to a school were cut in half from 20% to 10%, then a corresponding 10% increase would be needed to accommodate higher motorized trips. This trade-off would likely add some expenses to the rural site option versus a comparable urban option.

This assumption may not always be the case, as case studies in Moses Lake and the Mead School District indicate that a new school located in a rural area may actually reduce reliance on busing and personal vehicle trips for a significant number of students. Nevertheless, schools sited in rural areas will result in the need for capital improvement and ongoing road maintenance over the life of the facility. The King County School Task Force data suggests a lifetime facility cost of approximately $1.7 to 2 million per school sited in rural locations.[39]

Factors that affect traffic-mitigation-measure costs include the need to purchase right-of-way, the number of crossings, whether traffic signals are needed, whether roundabouts are needed, whether electricity needs to be extended, whether there is a need for curbing. Traffic speeds tend to be higher along rural roads and thus more traffic calming mitigation measures may be needed in rural settings.

Stormwater management

While some jurisdictions maintain stormwater utility systems and could require the extension of stormwater mains at a cost similar to sewer mains, it is more likely that rural schools would be required to develop

---

[37] Washington State Department of Transportation, "The Pedestrian/Bicyclist and Safe Routes to Schools Programs: 2023-2025 Prioritized Project List and Program Update," (2022), https://wsdot.wa.gov/sites/default/files/2022-11/2023-2025-Bike-Ped-SRTS-Priortized-Project-List-Program-Update_0.pdf

[38] Washington State Department of Transportation, "Safe Routes to School Program," (2023), https://wsdot.wa.gov/business-wsdot/support-local-programs/funding-programs/safe-routes-school-program

[39] King County, "King County School Siting Task Force: Final Report and Recommendations," (2012), https://kingcounty.gov/~/media/depts/executive/performance-strategy-budget/regional-planning/GrowthManagement/2012_SchoolSitingFinalReportAndRecommendations.ashx?la=en

stormwater retention facilities. Associated costs for these type of facilities are estimated at several hundred thousand dollars.[40] [41]

Proximity to housing

It has long been a central planning concept that schools, especially elementary schools, serve as one of the focal points for a neighborhood.[42] [43] [44]

This nexus between the community and its schools helps cement the bond between students and their educational environment, and between the families in the school catchment area. It also helps increase the ability of students to participate in extracurricular activities such as sports teams, gifted and talented programs, dances, plays, and other events. It helps minimize the amount of travel both for those biking, walking, or busing to the school, and for parents or students driving to the school on a regular basis.

Siting schools in rural areas can take a toll on community and student connections to the school, and can present a financial burden, especially to lower-income households. For households stretched for financial resources, this can limit the ability of some students and families to participate in activities and fundraisers or to afford supplies and other expenses incurred through the course of a school year. Transportation for regular school hours is provided by the bus system, but after-school activities require private transportation, which can provide inequitable access to those opportunities. It may be harder for low-income households to participate.

Shared use agreements

It is not uncommon for cities and counties to have shared use agreements with school districts. These agreements allow the use of school facilities such as ball fields, pools, gymnasiums, auditoriums, and other facilities for the benefit of the broader community. In some locations, school sites are used for community gardens, farmers markets, continuing education, job training, and cultural events.

Shared use agreements can allow for the sharing of costs and risks among partners to the agreement, and this can help reduce the cost of new facility development for the district. The exact amount of this cost impact will vary greatly and cannot be identified in a precise way.

While shared use agreements with counties may be possible for schools located in rural areas, the ability for cities to partner with schools for shared use of facilities is limited in these circumstances. This is because city boundaries are not allowed to extend past the urban growth area and thus rural schools by definition are not necessarily located close to nor within cities. In these circumstances, the city would likely need to partner with the county for a shared use agreement at a school located in the rural area.

---

[40] Environmental Protection Agency, "Costs & Benefits of Storm Water BMPs," (2023), https://www3.epa.gov/npdes/pubs/usw_d.pdf
[41] WGA, "Creative Stormwater Detention Option is Gaining Ground," (2023), https://wga-llp.com/creative-stormwater-detention-option-is-gaining-ground/
[42] American Planning Association, American Society of Planning Officials, "Neighborhood Boundaries, PAS Report 141," (1960), https://www.planning.org/pas/reports/report141.htm
[43] Highline Community College, "Summary Report: First Summit on School Planning and Siting in Washington," (2007), https://web.archive.org/web/20120906001855/https:/www.k12.wa.us/schfacilities/publications/pubdocs/summitschoolsitingreportmay2007.pdf
[44] Puget Sound Regional Council, "Vision 2050 School Siting: implementation Briefing Paper," (2021), VISION 2050 School Siting Implementation Briefing Paper (July 2021) (psrc.org)

This reduced ability to utilize school facilities can take a particular toll on lower-income communities that often utilize school facilities after hours for recreation and educational purposes.[45] [46] [47] [48]

Impact fees

Impact fees are a one-time charge collected from new development to pay for new facilities needed to serve that growth. In Washington, impact fees may be collected for roads, parks, fire, and school facilities.

RCW 36.70A.211 (3) states that a school sited under this section may not collect or impose the impact fees described in RCW 82.02.050. This can significantly affect the ability of the district to pay for the new facility. Even though a district cannot solely rely upon impact fees for new facility development, these fees can potentially represent a significant portion of the overall costs, especially if the new school is serving predominantly new residential development.

While the total number of districts that currently impose impact fees is not known, Commerce's Impact Fee Deferral Report published in December 2019, indicated school impact fees were collected by 54 jurisdictions on behalf of school districts.[49] [50]

The inability to collect impact fees could be the deciding factor in whether a facility is even feasible outside of an urban growth area. This could especially be the case if impact fees are anticipated to cover 25 to 50% of the cost of the new school.

---

[45] Amelie Ramirez, Salud America!, "Active Spaces & Latino Kids Research, Shared Use Agreements," (2016), https://salud-america.org/active-spaces-latino-kids-research-shared-use-agreements/
[46] Nathan Blackwell, MLT News, "Mountlake Terrace council eyes changes to shared-use agreements with school district," (2021), Mountlake Terrace council eyes changes to shared-use agreements with school district | MLTnews.com
[47] ChangeLab Solutions, USDA SNAP funded, "Shared Use in the Summer, Opening school spaces to the public when classes are out," (2023), Shared Use in the Summer | ChangeLab Solutions
[48] HiP Cuyahoga, "Shared Use Agreement Resource Guide," (2015), SUAResourceGuide_Oct2018.pdf (prchn.org)
[49] Washington State Department of Commerce, "Impact Fee Deferral Report," (2019), https://www.commerce.wa.gov/wp-content/uploads/2020/05/Impact-Fee-Deferral_Final-Report.pdf
[50] Steve Butler, Municipal Research Services Center, "The Ins and Outs of School Impact Fees," (2018), https://mrsc.org/stay-informed/mrsc-insight/january-2018/the-ins-and-outs-of-school-impact-fees

Conclusions on rural school siting

Since 2017, Commerce found only two schools that are sited outside a UGA, served by a new extension of public facilities or utilities from an urban area, and serve students from both rural and urban areas. During this period, 183 new schools were sited inside the urban growth area either on newly acquired sites or on existing land. In addition to these schools, Commerce found two schools sited near the boundaries of or outside of urban growth areas that exemplify some of the key factors that affect school siting decisions.

To conduct a cost analysis of schools sited in rural areas, Commerce conducted additional interviews with subject matter experts and reviewed the extensive research on school siting in Washington that has been done to date in order to identify additional factors that may impact the cost of siting schools in rural areas.

This analysis indicated that:

- The total cost differential needed to favor a siting decision to a rural site must generally exceed $4.5 million within a half-mile of an urban growth boundary, and over $6 million if over one mile from the UGA.
- This is primarily due to the cost of water, sewer, stormwater, non-motorized transportation and motorized transportation costs and impacts. These costs are estimated at $1 million or more per mile for water and sewer utilities, as well as pedestrian and bike facilities. Thus, each half-mile results in at least $1.5 million in system extension costs.
- Motorized transportation may increase the amount of parking/drop-off/pick-up areas by up to 10% adding a small amount to parcel size requirements. Ongoing maintenance and upkeep costs for the rural site will result in impacts over the project timeline of up to $2 million.
- it is estimated that stormwater facilities will cost up to $1 million more for rural settings whether they are connected to a storm sewer system or utilize on-site detention.
- Land costs in rural areas may be 10% to 50% of a similar sized urban site. This assumes that the rural site will not have any site hazards or encumbrances that reduce its usable portion.
- The need for a similar-size parcel can be reduced in the urban area if a school incorporates approaches like multi-story construction with subterranean, multi-story or shared parking and access. For sites where an existing site is already owned or an existing school district facility can be renovated or rebuilt, the land cost differential takes a hard preference for that location whether urban or rural.
- While it is likely that the opportunities for shared use agreements may be higher in urban locations, the impact of this factor on the overall cost and benefit analysis is indeterminate.
- One factor, which very well may be the deciding one, is the ability to collect impact fees for schools located within urban growth boundaries. School funding can be difficult and thus the availability of an additional significant funding option is a powerful tool to favor urban locations.

In places where school enrollment continues to grow, school districts will continue to find ways to accommodate their growing student populations, and in particular, due to considerations of site availability, cost and size, school districts will likely continue to consider sites outside of UGAs for new schools that serve students from both rural and urban areas. Some strategies that might support benefits of an urban school while addressing a district's needs may include:

- Placing school buildings within the UGA and expanding the UGA to allow for school fields.
- Multi-story schools with attention to careful site planning on smaller sites.
- Integrating school sites into new developments.

Background studies on rural school siting

Discussions about rural school siting have been ongoing throughout the state for many years and past efforts significantly inform this analysis. The following background highlights past work that can provide the foundation for the provisions that currently allow communities to extend sewers and urban services to schools on rural sites that serve students from rural and urban areas.

School summit

In response to the introduction of several bills regarding school siting during the legislative sessions in 2005 and 2006, the Office of the Superintendent of Public Instruction (OSPI) and the Department of Community Trade and Economic Development (CTED), now the Department of Commerce, held a public forum in 2006 which resulted in a summary report published in February 2007.[51]

One of the key issues that forum participants raised is the difficulty of finding and securing adequate sites for new school facilities, especially within UGAs. However, they also identified the lack of incentives to consider smaller parcel sizes for school sites. They further noted an absence of other strategies that could open more options within urban areas, such as schools benefiting from shared use or joint facilities.

The forum recommended 11 considerations for siting new schools:

- Foster close coordination between school districts and local government planning bodies to help achieve the most favorable outcomes;
- Consider a statewide review of impact fees[52] and whether their use should be expanded to cover the full costs of school construction;
- Create an expedited permit review process for schools;
- Create flexibility in zoning and development standards (two-story buildings, reduced setbacks, reduced parking requirements);
- Develop model ordinances for co-location and shared use of school facilities, applicability of flexible design and development standards, and model impact fees;
- Develop policies to favor remodeling schools and encourage selection of infill sites for new schools;
- Develop technical assistance tools to support collaborative school siting;
- Establish grant program for rehabilitation of historic schools modeled after the state's Historic County Courthouse Rehabilitation Grant program;
- Provide financial incentives for preservation, rehabilitation, and/or reuse of historic schools;
- Provide financial incentives for schools sited inside urban growth areas; and
- Provide incentives for infill development.

It is important to note that the recommendations did not represent consensus among all the participants.[53]

---

[51] Highline Community College, "Summary Report: First Summit on School Planning and Siting in Washington," (2007), https://web.archive.org/web/20120906001855/https:/www.k12.wa.us/schfacilities/publications/pubdocs/summitschoolsitingreportmay2007.pdf

[52] Impact fees refer to a one-time fee collected from new development to pay for costs associated with that development's increased demand for roads, parks, fire, or school facilities. For greater detail, see statutory definitions outlined by RCW 82.02.090.

[53] Highline Community College, "Summary Report: First Summit on School Planning and Siting in Washington," (2007), https://web.archive.org/web/20120906001855/https:/www.k12.wa.us/schfacilities/publications/pubdocs/summitschoolsitingreportmay2007.pdf

King County School Task Force

The King County Growth Management Planning Council convened the King County School Task Force in 2011 to finalize recommendations on school siting to inform updates for the Countywide Planning Policies. The task force deliberated on issues of rural school siting and completed its final report and recommendations in March 2012. The main goal of the task force was to evaluate the inventory of rural properties that school districts own and make recommendations for their use or disposition, according to eight Guiding Principles, which the task force defined as:[54]

- Academic Excellence: Educational facilities should promote and support Students' academic achievement.
- Equitable: All children should have access to quality educational facilities.
- Financially Sustainable: School siting should be financially sustainable for each impacted jurisdiction [and] make the most efficient use of total tax dollars.
- Support Sustainable Growth: Planning for school facilities shall comply with state law and be integrated with other regional and local planning, including land use, transportation, environment, and public health.
- Community Assets: Schools should unite the communities in which they are located and be compatible with community character.
- Based on existing data and evidence: The Task Force process shall utilize recent demographic, buildable lands inventory, and other relevant data and information.
- Public Engagement: The Task Force process should include robust community engagement with impacted communities. Meetings will be transparent and open to the public for observation. The Task Force shall provide opportunities for public comment.
- Best Practice and Innovation: Lasting recommendations should serve the region well for years to come and support education, health, environmental, programmatic, fiscal, and social objectives

The task force evaluated 18 sites as a part of this process and found that several rural sites should be allowed to be developed for new school facilities with the extension of tightline sewers (sized specifically for the school).[55] These allowances were limited to sites owned by school districts and were located close to the urban growth area. In some cases, the task force recommended adjustment to the urban growth boundary to incorporate the school structures within the urban area.

The task force concluded with a recommendation that new schools predominantly serving students located within the urban growth area should be located within that boundary.[56]

Legislative Task Force on School Siting 2015

In the 2015 capital budget,[57] Washington formed a Legislative Task Force on School Siting to review the issue of siting schools inside and outside of urban growth areas in accordance with the GMA's planning goals and requirements. Their scope included consideration of capacity issues and infrastructure needs facing school districts and local governments. The task force was also required to consider:

---

[54] King County, "King County School Siting Task Force: Final Report and Recommendations," (2012), https://kingcounty.gov/~/media/depts/executive/performance-strategy-budget/regional-planning/GrowthManagement/2012_SchoolSitingFinalReportAndRecommendations.ashx?la=en

[55] Law Insider, "Tightline Sewer Definition," (2023), https://www.lawinsider.com/dictionary/tightline#:~:text=Tightline%20means%20a%20sewer%20line,a%20particular%20facility%20or%20place

[56] King County, "King County School Siting Task Force: Final Report and Recommendations," (2012), https://kingcounty.gov/~/media/depts/executive/performance-strategy-budget/regional-planning/GrowthManagement/2012_SchoolSitingFinalReportAndRecommendations.ashx?la=en

[57] 2EHB 1115 (2015)

- Transportation impacts of schools in urban and rural areas;
- Growth impacts of schools when they are constructed in urban and rural areas;
- The availability and cost of public services such as water, sewer, transportation, law enforcement, emergency response facilities and services, and other facilities and services in urban and rural areas; and
- Identify school locations that provide the most financially sustainable facilities and make the most efficient use of total tax dollars for all impacted jurisdictions.

Upon deliberation, the task force came to consensus to:

- Allow extension of urban services such as sewer and water into rural areas, exclusively to serve schools;
- Amend urban growth areas to include new school sites under certain circumstances;
- Classify schools as "essential public facilities" under the Growth Management Act; and
- Provide a safe harbor from litigation for counties, cities, and school districts that site schools outside of an urban growth area, and/or require courts and the Growth Management Hearings Board to defer to local school siting decisions that meet certain criteria.[58]

Clark County Comprehensive Plan School Element 2016

In 2005, CTED[59] financed a pilot project for school district and local government coordination. At that time, the Clark County Quality Schools Task Force convened to work on issues that included school siting policy. Part of the results of that effort was the development of a unique element in the county's Comprehensive Plan regarding schools.[60]

The Comprehensive Plan's School Element contains several policies regarding the siting of schools in rural areas. Policy 10.2.1 states, "School facilities serving predominantly urban populations should be preferably located in urban growth areas then in rural areas adjacent to the urban growth boundary…"

Supplemental policies addressed schools serving urban students sited in a rural area:

- School facilities shall be located as close to the UGA as possible, preferably within a quarter-mile.
- Before siting a school facility outside the urban growth area, the school district shall demonstrate that the proposed site is more suitable than alternative sites within the existing urban growth area.
- The school district shall demonstrate that the transportation facilities serving the site are adequate to support site-generated traffic, including buses.
- the school district shall agree to connect to public water and sewer when they become available within 300 feet or less of the site, provided such a connection does not necessitate special facilities (e.g., pump stations) or capital improvements (e.g., larger pipes) to increase the capacity of the system.[61]

---

[58] Washington State Legislature, "Report of the Legislative Task Force on School Siting," (2015), https://leg.wa.gov/JointCommittees/archive/TFSS/Documents/TFSS_FinalRpt.pdf
[59] The Washington State Department of Commerce, formerly the Department of Community Trade and Economic Development (CTED).
[60] Clark County "Clark County Comprehensive Plan School Element 2016, Clark County Comprehensive Plan 2015-35," (2016), https://clark.wa.gov/sites/default/files/dept/files/community-planning/2016-update/Plan%20Adoption/Comp%20Plan%20Text/14_School%20Element-tc%20version.pdf
[61] Clark County "Clark County Comprehensive Plan School Element 2016, Clark County Comprehensive Plan 2015-35," (2016), https://clark.wa.gov/sites/default/files/dept/files/community-planning/2016-update/Plan%20Adoption/Comp%20Plan%20Text/14_School%20Element-tc%20version.pdf

Commerce guidance on rural school siting policy

The Department of Commerce issued guidance on rural school siting in 2017 in response to the adoption of RCWs 36.70A.211, 36.70A.212, and 36.70A.213.[62] Guidance in the form of frequently asked questions addresses points that these amendments may raise for officials from cities, counties, and school districts.[63]

The guidance sets school siting in context within the GMA's encouragement of compact urban growth to limit sprawl. It affirms that the GMA does not prohibit building schools on rural sites, but has largely prohibited extending certain public services into rural areas. It then describes how amendments in 2017 outline specific conditions by which communities may extend services and utilities for schools in rural areas.[64]

Under the current approach, RCW 36.70A.213 requires that each of the following conditions be met prior to extending public facilities and utilities to a rural school site that serves students from rural and urban areas:

- School district policy in-place: The school district board of directors must have adopted a policy addressing educational program requirements, school service area and facility needs.
- School district action to select the site: The district must find the proposed site to be suitable for a school and that the school (including associated recreational facilities) cannot reasonably be collocated at an existing school site.
- Concurrence by county and affected cities: The County and any affected cities must agree to the extension of public facilities and utilities for the rural school site.
- Limited extension of urban services: If public facilities or utilities are extended beyond the urban growth area to serve a school, with some exceptions, they must only serve the school and the school district is to bear the cost of extension based on a reasonable nexus to the school's impacts to the area.
- Mitigation of impacts: Any impacts associated with the siting of the school must be mitigated as required by the State Environmental Policy Act.[65]

Pierce County Comprehensive Plan

Following adoption of RCWs 36.70A.211 and 36.70A.212, which specifically apply to Pierce County, the County amended its Comprehensive Plan to conform to the new statutes. The amendments retained a provision preferring expansion of existing sites to the creation of new facilities.[66]

King County Growth Management Planning Council

Following the adoption of RCWs 36.70A.211, 36.70A.212 and 36.70A.213, King County conducted additional work to finalize rural school siting recommendations. This effort has resulted in the convening of coordination sessions between school districts and the county regarding growth plans and the siting of new school facilities.[67] In addition, the county has identified actions jurisdictions can take to facilitate the development and renovation of schools within the UGA. There were 10 actions identified as a result of this effort:

---

[62] Washington State Department of Commerce, "The Siting of School Facilities and the Growth Management Act: 2017 School Siting Law: Frequently Asked Questions," (2018), https://deptofcommerce.app.box.com/s/prt1n00019b2c2johnnc41kruu6c2312
[63] Washington State Department of Commerce, "The Siting of School Facilities and the Growth Management Act: 2017 School Siting Law: Frequently Asked Questions," (2018), https://deptofcommerce.app.box.com/s/prt1n00019b2c2johnnc41kruu6c2312
[64] Washington State Department of Commerce, "Planning for School Siting", (2018), www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-school-siting
[65] RCW 43.21
[66] Pierce County, "Comprehensive Plan Text Amendment- Rural School Policies: No.891627," (2018), https://www.piercecountywa.gov/DocumentCenter/View/75567/Staff-Report---Rural-Schools-891627
[67] King county Office of the Executive, "King County GMPC School Siting Activities," (2020), https://kingcounty.gov/depts/executive/performance-strategy-budget/regional-planning/GMPC/SchoolSiting.aspx

- Identify surplus public properties that could work as new school sites.
- Assist with identifying private properties that could be available for new school sites.
- Look for opportunities for shared use of buildings, fields, parking, and other facilities between the city or county and the school district.
- Consider options and zoning for mixed use development that could accommodate a school.
- Investigate how regulations and processes can be modified to make challenging sites work for new, expanded, and renovated school facilities (such as providing flexible application of development regulations for height restrictions, maximum lot coverage, and parking standards).
- Consider the feasibility of allowing playfields in the Rural Area adjacent to schools located in the UGA and with direct access from the UGA.
- Broaden the number of zone classifications within which schools are permitted to locate.
- Coordinate the permit review process to improve certainty for school districts and to shorten the permitting process time (using priority permitting as appropriate).
- Implement a phased review of school development so the school site may be modified as needed over time and so portable facilities may be sited and/or replaced in an efficient manner.
- Work with school districts, to establish site-specific transportation demand management protocols to encourage more walking, biking, and transit ridership to reduce the need for parking.
- Partner with school districts in the planning and financing needed to improve, if appropriate based on topography and surrounding neighborhood characteristics, walking and biking routes to the school.

Puget Sound Regional Council Vision 2050

Also in response to the adoption of statewide legislation regarding rural school siting, the Puget Sound Regional Council (PSRC) embarked on revisions to Vision 2050, the regional planning framework, to bring it into conformance with state provisions. Any countywide planning policies must be consistent with the GMA goals and the multicounty planning policies embodied in Vision 2050. PRSC adopted the following policies:

- Work cooperatively with school districts to plan for school facilities to meet the existing and future community needs consistent with adopted comprehensive plans and growth forecasts, including siting and designing schools to support safe, walkable access and best serve their communities.
- Site schools, institutions, and other community facilities that primarily serve urban populations within urban growth areas in locations where they will promote the local desired growth plans, except as provided for by RCW 36.70A.211.
- Locate schools, institutions, and other community facilities serving rural residents in neighboring cities and towns and design these facilities in keeping with the size and scale of the local community, except as provided for by RCW 36.70A.211.

The PRSC also adopted two action statements. Specifically, the PRSC committed to:

- Initiate and support discussions with the Office of the Superintendent of Public Instruction to facilitate updates that modernize school siting standards, especially those related to site area requirements. Updates should work to align school siting standards with the goals of the Growth Management Act and facilitate school districts' ability to better meet urban capacity needs.
- Research and develop guidance on innovative methods to update regulations and local plans to develop a regional approach to school siting and to assist local jurisdictions and school districts in siting new schools in urbanized areas.

The PSRC published a briefing paper in July 2021 announcing the policy changes and giving an update on actions that had been taken in member counties regarding the issue of school siting.[68] The actions included:

- King County's Comprehensive Plan calls for locating schools that primarily serve students from urban areas inside the Urban Growth Area and commitment to cooperative planning between jurisdictions and school districts.
- The Kitsap County Comprehensive Plan requires designing schools to be compatible with the surrounding community character and needs. In addition, it calls for locating schools in Designated Centers or near major transportation corridors and public transportation routes. Finally, it talks about Safe Routes to School as a potential strategy for reducing vehicle trips.
- Pierce County's countywide planning policies call for the county, municipalities, and education service providers to coordinate planning activities and determining specific site requirements for all public and private schools, with an emphasis on locating in urban areas and compatibility with neighborhood characteristics.
- The Snohomish County Comprehensive Plan outlines how schools should be primarily located inside urban growth areas and, if not, to allow for urban growth area expansions if a site is adjacent to the existing urban area. Two policies reference working with schools to improve public transportation, walking, and biking.

WAC update 365-196-350

An update to WAC 365-196-350 in early 2023 represents the most recent changes to how schools may be sited in rural areas. The rules provide for the extension of public facilities and utilities to new schools sited in rural areas that serve a mix of urban and rural students if certain requirements are met. The rules emphasize coordination and concurrence amongst the various government entities that participate in comprehensive planning and provision of utilities and school siting. This includes cities, counties, school districts, and other special districts such as sewer districts. The updated rules address other provisions to define circumstances where communities may extend and pay for urban services (such as sewers) into rural areas for schools as well as residents or other rural properties.

[68] Puget Sound Regional Council,"Vision 2050 School Siting: implementation Briefing Paper," (2021), VISION 2050 School Siting Implementation Briefing Paper (July 2021) (psrc.org)

Appendix A: Mapping urban growth areas and new school construction since 2017

Part of Commerce's methodology for identifying schools built outside of UGAs since 2017 that met the other report criteria was conducting geospatial analysis of Office of the Superintendent of Public Instruction (OSPI) Inventory and Condition of Schools (ICOS) system data, and a state GIS layer of urban growth areas.

One of the products of that work was a Tableau map visualizing the location of new school construction since 2017, with UGAs overlaid. It is important to note that only schools that voluntarily report to OSPI or receive School Construction Assistance Program funding are reflected in the ICOS system.

Commerce conducted outreach to schools identified through this analysis that also potentially met the report criteria of serving students from both rural and urban areas, and being served by an extension of public facilities or utilities from an urban area. Additionally, not all of the schools in the ICOS system are new construction on new sites. Some schools are additions to or replacements of existing schools.

Maps of urban growth areas and schools in Washington

The maps below present UGAs and schools constructed after 2017 by region. The two schools sited outside the UGA and which meet all report criteria are not annotated in the figures that follow.

Figure A-1. Map of schools built inside and outside of UGAs from 2017-2023

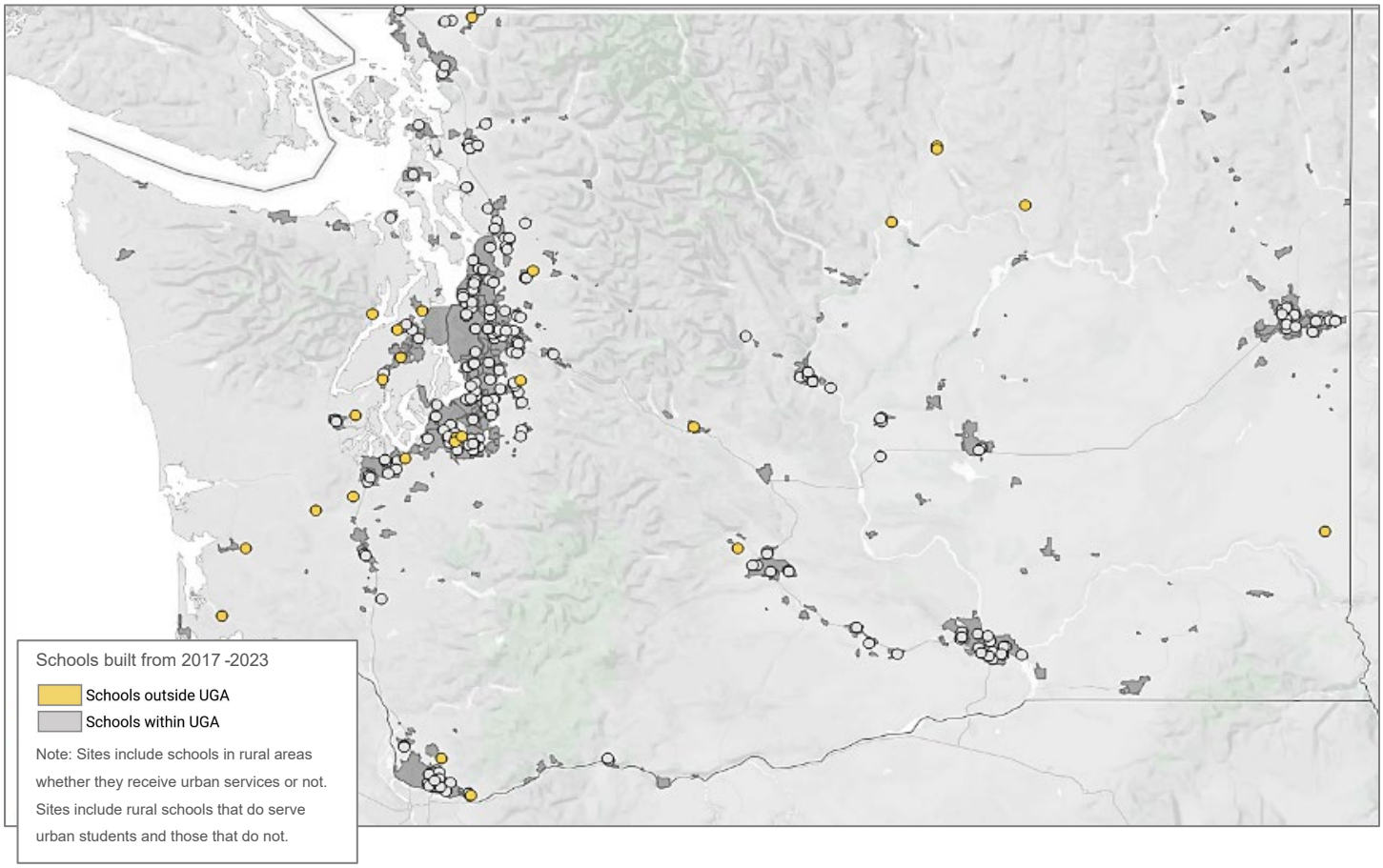


Figure A-2. Regional map: Northwest Washington

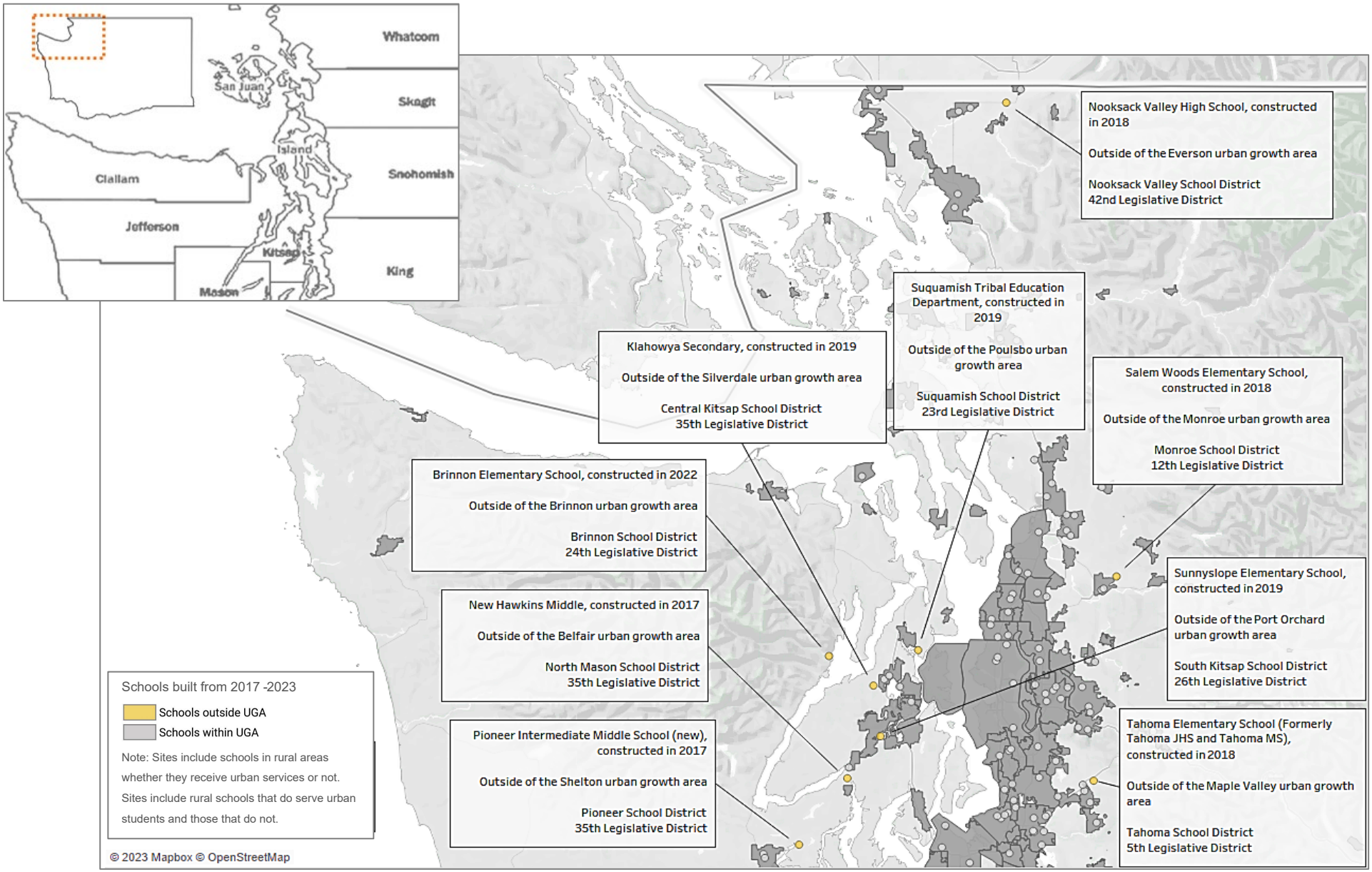


Figure A-3. Regional map: Southwest Washington

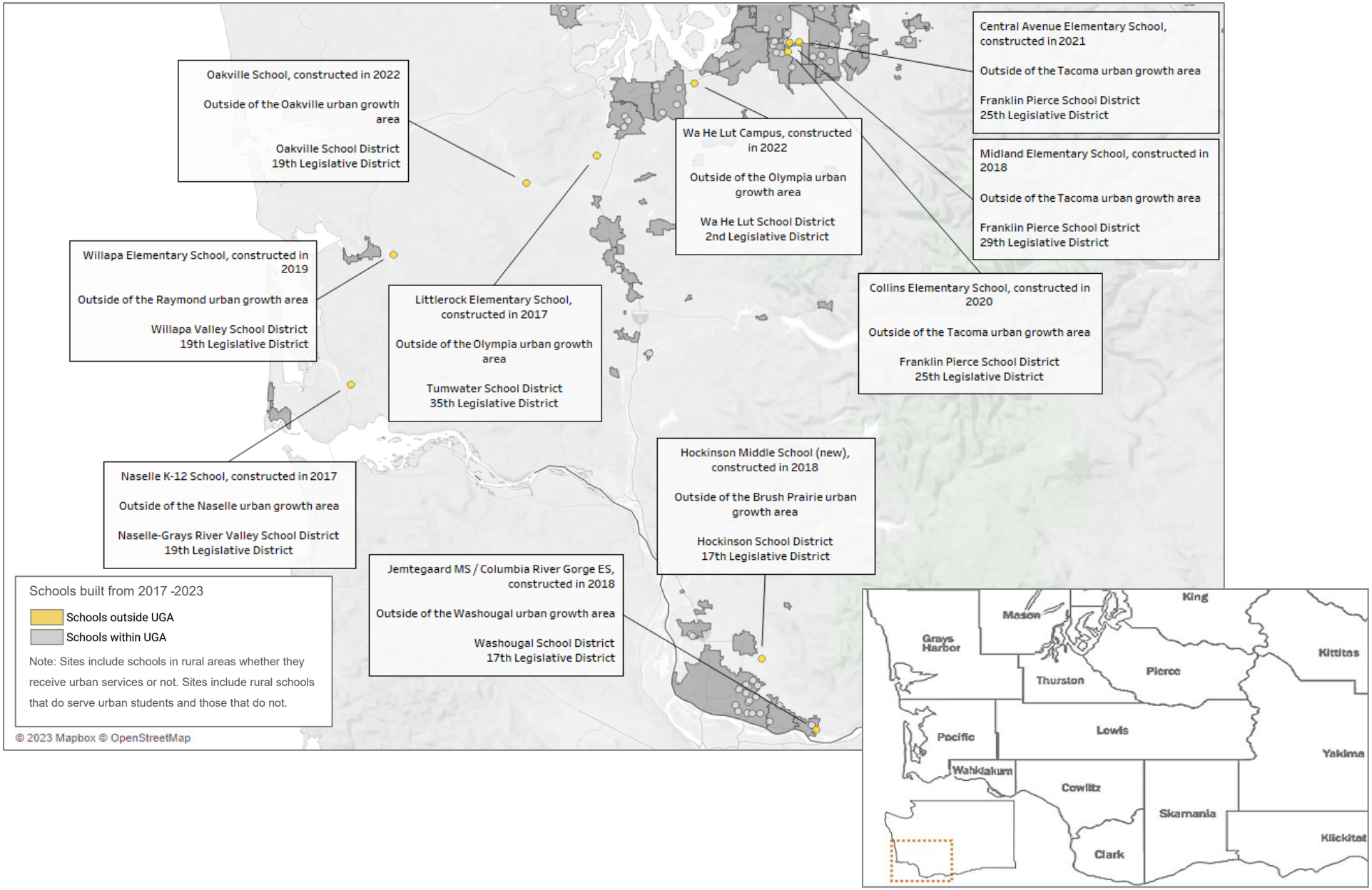


Figure A-4. Regional map: Northeast Washington

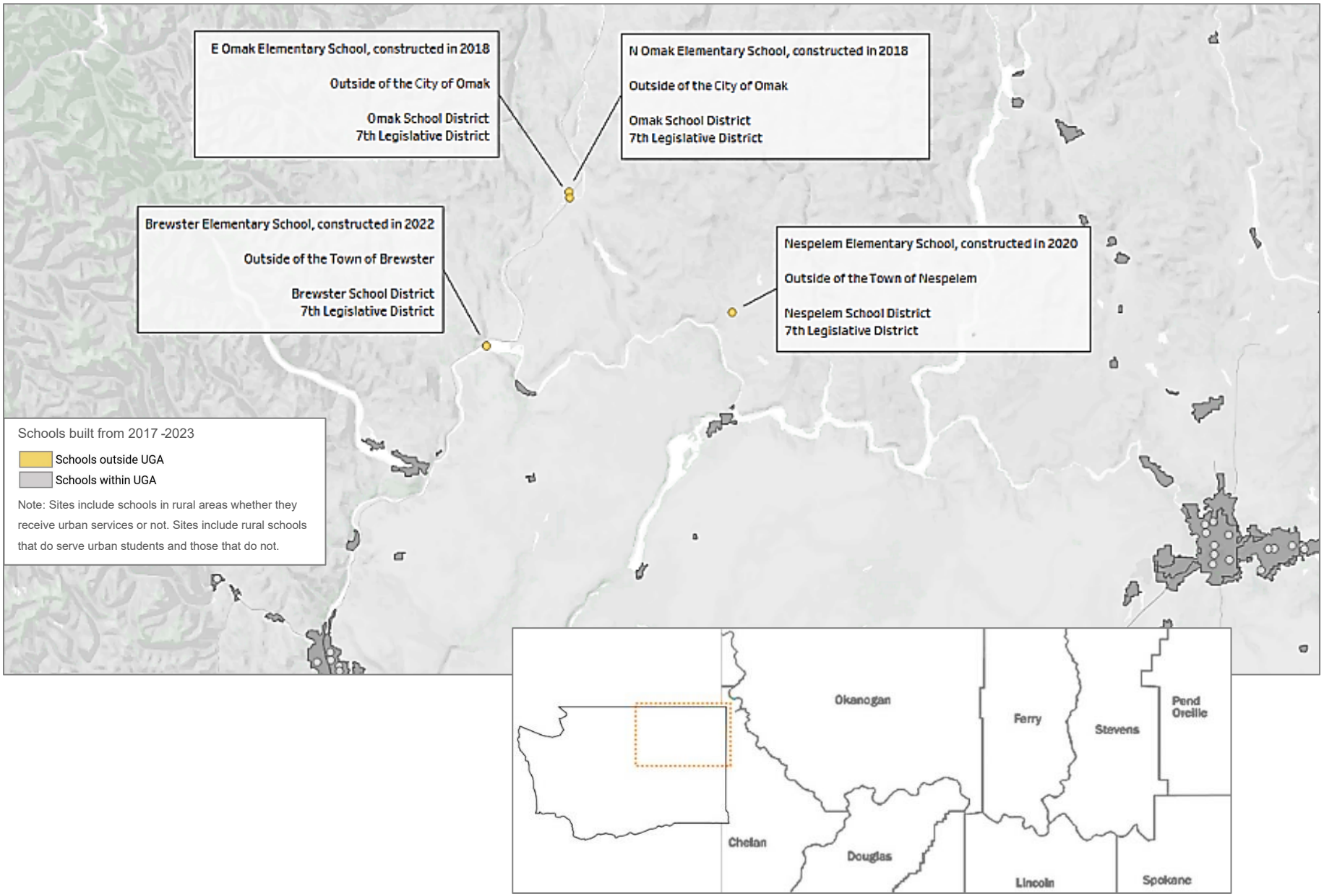


Figure A-5. Regional map: Southeast Washington