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May 28, 2021

John Featherstone, Surface Water Utility Manager
Public Works Department
City of Shoreline
Shoreline, WA

Sent via email to jfeatherstone@shorelinewa.gov

Dear John,

Thank you for the opportunity to provide input to the City's review of the Surface Water Management Educational Fee Waiver program. Shoreline School District has applied for the waiver each year it has been offered, and approval of the waiver has allowed us to invest the value of the annual fee, currently over \$500,000, in educating young citizens of Shoreline about various ecosystems and the many ways they can protect the environment. We believe this collaborative approach reduces the need for larger, more complex surface water management systems in the future, and provides a significant benefit to the City of Shoreline and our mutual constituents.

Your invitation to offer input outlined three areas that would be beneficial to address from the School District's perspective:

1) UPDATED SWM FEES FOR SCHOOL DISTRICT PROPERTIES BASED ON VERIFIED ACTUAL HARD SURFACE COVERAGE

Hard surface coverage on school district properties is primarily determined by a) the footprint of the school building, b) the area of the parking lot, and c) the surface of the playfield.

The footprint of the school building: In recent years the District has replaced several single story schools with multistory buildings, thus significantly reducing impervious surface.

→ Recommendation: Ensure current, accurate hard surface coverage measurements before fees are assessed.

The area of the parking lot: The City's determination of parking requirements for a school recognizes that parking lot capacity not only provides on-site parking but also reduces traffic congestion on adjacent city streets during pick up and drop off times of the school day, and minimizes spillover parking into adjacent neighborhoods during large events. It would be helpful to have the City's SWM fee structure recognize that the City mandates parking lot capacity for the benefit of the neighborhood and City services, not just for the benefit of staff, student, and visitor parking during the school day.

→ Recommendation: Structure the SWM fee calculation to recognize City requirements and public benefits of school parking lot capacity

The surface of the playfield: The surface of school fields may be natural turf, which requires fertilization, irrigation, weed and pest control. Replacing these surfaces with manufactured turf options not only increases school and recreational use, it also reduces the application of chemicals and use of water to maintain the field.

→ Revisit the definition of manufactured turf as an impervious surface, to recognize the other benefits of use of the product to reduce stormwater runoff of other pollutants

2) PROGRAM CURRICULUM – EVALUATING PREVIOUS CURRICULUM AND PROPOSED IMPROVEMENTS TO CURRICULUM

We have appreciated the range of topics included in the approved curriculum. The current waiver procedure allows car washes using commercial car wash facilities, consistent with reducing water pollution in the topics included in the approved curriculum. While very few car washes are conducted now, other student activities and clubs have been formed in recent years focused on resource conservation and environmental protection.

→ Recommendation: Add credit for student clubs and related activities focused on resource conservation and the protection of the environment, consistent with the topics included in the list of approved curriculum.

3) OTHER NON-CURRICULUM BASED OPTIONS FOR POSSIBLE SWM FEE CREDIT

As a part of the permitting process and through enforcement of existing municipal code, each construction project permitted by the City is required to reduce stormwater runoff and to invest in onsite stormwater detention facilities.

Each year Shoreline School District invests millions of dollars in new construction and upgrades to facilities within the City of Shoreline. These projects have not only upgraded the property connections to the City's utilities infrastructure, they have also included the construction of large detention vaults to meet City requirements to reduce stormwater runoff.

Upgrades to school fields have reduced the use of fertilizers, herbicides, and pesticides, and eliminated or significantly reduced the need for irrigation. In addition, each project has implemented resource conservation measures that benefit the environment in many other measurable ways.

In the past decade major projects funded through Shoreline School District have included:

- New construction: Shorewood High, Shorecrest High, Edwin Pratt Early Learning Center, Parkwood Elementary, Einstein Middle, Kellogg Middle.
- Major renovation: Aldercrest Elementary, North City Elementary.
- Field upgrades (complete and currently underway): Ridgecrest Elementary, Shorewood High, Shorecrest High, Meridian Park Ballfields, Echo Lake Elementary, Parkwood Elementary, Einstein Middle, Kellogg Middle.

At a minimum the surface water management fee should credit the investment in infrastructure for projects funded and constructed by the school district, but also recognize the ongoing value to the ecosystem of reduced use of chemicals, reduced irrigation, and enhanced resource conservation – all benefits to the City's surface water management system.

→ Recommendation: Credit the construction cost of stormwater connections and detention facilities, and recognize the reduction in pollutants realized through school district construction projects

One last note: there may be a misperception by some that the State will increase funding to school districts to cover increased utility costs. That is not true. The same allocation of resources is used to pay for teachers, textbooks, paper, equity initiatives, school counselors and other educational priorities, as well as the cost of utilities. If the SWM fee waiver program is eliminated or reduced, the additional cost will be paid from the District's general operating budget and directly reduce funds available to meet the instructional needs of students.

Again, we greatly appreciate the opportunity to provide feedback for the City's consideration as you review the SWM Educational Fee Waiver Program. Our staff would welcome questions or further dialogue with the City concerning the ideas put forth in this letter.

Sincerely,



Marla S. Miller
Deputy Superintendent

Cc: Shoreline School District Board of Directors
Rebecca Miner, Ed.D., Superintendent
Debbie Tarry, City Manager, City of Shoreline