

# NORTH THURSTON PUBLIC SCHOOLS

CONSTRUCTION & DESIGN • 6620 CARPENTER ROAD S.E. • LACEY, WASHINGTON 98503  
TELEPHONE (360) 412-4500 • FAX (360) 412-4505 • WWW.NTHURSTON.K12.WA.US

July 17, 2020

Thurston County Resource Stewardship  
2000 Lakeridge Dr. SW  
Olympia, WA 98502  
[permit@co.thurston.wa.us](mailto:permit@co.thurston.wa.us)

RE: NORTH THURSTON PUBLIC SCHOOLS NO. 3 Comments  
Re: Project #2020102731 Bunny Run

To Whom It May Concern:

North Thurston Public Schools (NTPS) received Thurston County's request for review of the proposed Project #2020102731 Bunny Run development. NTPS has had the opportunity to review the application for the proposed development which the County forwarded along with the notice. In response to your consultation request, NTPS provides the following:

The proposed development will create additional residential units within North Thurston Public Schools boundaries. The proposed residential units are planned to be served by Seven Oaks Elementary School, Nisqually Middle School and River Ridge High School.

NTPS has determined that future proposed housing units will generate approximately .76 FTE per single-family unit/townhome. This determination is based on multipliers derived from the attached Student Generation Factor worksheet for NTPS and U.S. Census data as presented in Demographic Multipliers for Common Configurations of Standard Housing Types for School Age Children from U.S. Department of Commerce.

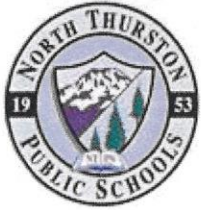
As described in the district's Capital Facilities Plan (CFP), NTPS schools are over capacity. NTPS does not own sufficient land for additional schools nor sufficient facilities to house the projected additional students generated by the proposed development. Purchases of land with available water and sewer service, temporary classrooms and future facilities to house children are anticipated as a result of the increased enrollment projected from new residences such as this subdivision. In addition, sidewalks and bus facilities must be created to provide safe walking routes and transportation services for school children.

The cost of purchasing land and temporary classrooms and constructing new school facilities is estimated to be \$4,485 per each new single-family / townhome residential unit. This assessment of costs is based upon Appendix A of the CFP, Tables 18 and 19. The district adjusts this assessment annually to reflect the district's current costs. Therefore, for the 5 new single-family / townhome units proposed under this application, the cost of mitigating impacts is found to be \$22,425. Such costs are subject to inflation.

The State Environmental Policy Act requires proposed developments to mitigate probable significant adverse environmental impacts on the environment, which includes public schools. See

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WAC 197-11-444(2)(d)(iii). The addition of new students to NTPS facilities as a result of the proposed future development constitutes such an impact. Similarly, the State Subdivision Act, in RCW 58.17.110(2), requires that the permitting jurisdiction find that proposed plats adequately provide for schools and school grounds. The proposed development must provide mitigation to ensure that such facilities are available for the future proposed new residents.

For these reasons, NTPS has determined that mitigation measures are needed to compensate for the impact of the increased student enrollment that this development will generate on its schools. NTPS asks that the County note such mitigation measures in the County's staff report for consideration of the proposed application, in its SEPA threshold determination, and on the face of the plat when recorded.

If the proponent of this proposed development provides NTPS with evidence that the assumptions of the CFP's Appendix A are not applicable to its proposed new units, NTPS may revise this assessment. NTPS may consider unusual circumstances of specific developments and may adjust the projected fee amount for specific developments if necessary. Should the developer provide NTPS with cause to revise its assessment, NTPS shall set forth its reasons for adjusting the fee in written findings submitted to the County by letter.

Finally, we would appreciate it if the County would promptly provide us notice of the date and time of any hearing on the proposal and a copy of any environmental determination made or other notice generated concerning this proposed project. These comments are provided based upon the information that has been made available to NTPS at this time. Please note that NTPS reserves its rights to provide further and additional comments on this application.

Thank you for the opportunity to respond concerning this proposed development. Please call me at (360) 412-4500 if you have any questions.

Sincerely,

Dean Martinolich  
Director of Construction & Design

ec: Dr. Debra Clemens, Superintendent, NTPS  
Monty Sabin, Assistant Superintendent of Operations, NTPS  
Deanna Maddux, Director of Transportation, NTPS  
Rebecca Lee, Principal of Seven Oaks Elementary, NTPS