



August 7, 2022

To: Robin Proebsting ([permittinglegislation@kingcounty.gov](mailto:permittinglegislation@kingcounty.gov))  
King County Permitting Division  
919 SW Grady Way, Suite 300  
Renton, WA 98057

Re: Draft School Impact Fee Ordinance 2023

The King County Council has proposed an Ordinance to adopt school impact fees to be collected from all nonexempt *new* residential development in the unincorporated portions of the Tahoma (TSD), Federal Way, Riverview, Issaquah, Snoqualmie Valley, Highline, Lake Washington, Kent, Northshore, Enumclaw, Fife, Auburn and Renton school districts.

The GMVUAC encompasses the entire unincorporated area portion of the TSD and, as such, we reviewed the proposed Ordinance and the supplied *TSD Capital Facilities Plan 2022-2027 (Plan)* provided at: <https://kingcounty.gov/depts/local-services/permits/planning-regulations/~media/depts/local-services/permits/legislation-public-review/school-impact-fees-plain-language-summary-202207.ashx>.

We are concerned about projections of additional facilities in the coming 10 years that are shown in the *Plan*. It is our understanding that the stakeholder TSD Housing Committee has not yet made a recommendation to the TSD Board. Consequently, this forthcoming work is *not* reflected in the *Plan*.

The *Plan* states TSD has used its own data for the first time this year for single-family home impact fee calculations. However, it is not clear how the new calculation may have affected the increase in impact fees. In looking at the other King County-supplied school district capital facilities documents, some districts show increases; some decreases.

The plain-language summary of the proposed Ordinance suggests a financial plan is to be included that shows how service levels are expected to be maintained. It is not clear that information appears in the King County-provided school district documents including the *Plan*. In the recently approved 2022-2023 TSD Budget, there is not a line item labeled “*impact fees*,” but there is a line-item in the *budget pre-work* for \$500K under this title. If “*impact fees*” align with the official budget line item labeled “*local non-tax revenue*” on previous budgets, it was in the \$1M-\$2M range in the last budget.

Another concern is that the most recent TSD demographer’s report (used to create the enrollment projections for each TSD school) contains some errors. For example, it inappropriately mapped 63 single family homes in the unincorporated area to be served by Tahoma Elementary (57 built in 4Q 2021 and 6 under construction). While these developments do impact TSD, they are misrepresented as to the potential unincorporated area buildings impacted.

Because of concerns with the accuracy of the numbers and protections used to develop needs that feed into the proposed impact fees, the GMVUAC opposes the proposed Ordinance and encourages the King County Council to use up-to-date and accurate numbers, if and when, such impact fees are set.

Please note we take issue with the King County Council giving the Public only 10 days to respond on such a complex and far-reaching proposed Ordinance.

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Chair, GMVUAC

cc: King County Councilman Reagan Dunn ([reagan.dunn@kingcounty.gov](mailto:reagan.dunn@kingcounty.gov))  
TSD Superintendant, Mike Hanson ([mhanson@tahomasd.us](mailto:mhanson@tahomasd.us))