

**Schroader, Kathy**

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**From:** Amber Scott <amber.scott@esd112.org>  
**Sent:** Wednesday, May 25, 2016 12:40 PM  
**To:** Boldt, Marc; Stewart, Jeanne; Olson, Julie (Councilor); Madore, David; Mielke, Tom; Orjiako, Oliver; Cnty 2016 Comp Plan  
**Cc:** Marnie Allen  
**Subject:** Clark County Comprehensive Plan Update  
**Attachments:** Letter to County Councilors.pdf

Good Afternoon,

Attached please find correspondence from Marnie Allen with an enclosure showing the impact fee amounts collected by Clark County in 2009, 2011 and what is being requested. We would ask that these documents be submitted into the record for the Comprehensive Plan Update.

Thank you, and please let me know if you have any questions.

Kind regards,

**Amber Scott**

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# MARNIE ALLEN · ATTORNEY

Legal Solutions for Schools

May 25, 2016

Clark County Councilors  
1300 Franklin Street, 6<sup>th</sup> Floor  
Vancouver, WA 98660

Re: Clark County Comprehensive Plan Update

Dear Clark County Councilors:

This letter is being submitted on behalf of the ten Clark County School Districts (School Districts). I represent the School Districts in land use matters, facility planning, and I calculate their school impact fees.

On behalf of the School Districts, we appreciate the work County staff have done to coordinate and collaborate regarding school district Capital Facility Plans (CFPs), county land use matters that impact public schools and impact fees. The letter supplements the testimony that was provided at the hearing on May 24<sup>th</sup> and touches on the role of school district CFPs and impact fees in the County Comprehensive Plan Update.

Public schools are one of many capital facilities the County must plan for under the Growth Management Act. RCW 36.70A.020(12) and RCW 26.70A.030(12). The County also, under the State Subdivision Act, cannot approve a subdivision unless there are adequate provisions for schools. RCW 58.17.110. Schools are critical to the development and growth in a community and the law recognizes that. In Clark County, the requirement to plan for and ensure adequate provisions for schools is addressed through the adoption of school district CFPs and the collection of school impact fees.

School impact fees are calculated using a standard formula, which is in the Clark County Unified Development Code, Section 40.620.040. The formula allocates a portion of the costs to build schools to new housing that places increased demands on schools. In other words, new development that creates the need to build new schools is required to contribute to the cost through the payment of school impact fees. Without school impact fees, the entire cost to build schools that are required to serve the new development would be borne by the tax payers.

Because the growth, the number and type of school facilities, and the impacts new housing has on schools is different in every school district, just like the amount of a bond and the property taxes are different in each school district, the calculated school impact fee for every district is a different amount. The amounts are different, but the way they are calculated is the same.

A program of Educational Service District 112

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The amount of the school impact fees is different in each district even though the fee is calculated with the same formula. The fee amounts are different because factors like facility needs, average number of students living in new houses and property taxes are different in each district. These factors are used in the standard formula to produce the calculated fee amount. So the formula that is used is the same but the calculated amounts differ.

As was testified to and discussed in greater length in the Planning Commission work session and hearing, the amount of the school impact fees for multi-family housing units is increasing and in some cases exceeding the calculated single-family fee amount. There are two reasons we are seeing a significant increase in multi-family fees. First, there are more students living in multi-family housing units than there has been in the past. Second, owners of multi-family housing are paying less for schools in property taxes. More students in multi-family housing and low average assessed values and property taxes produce higher calculated school impact fees.

As you consider the School Districts' requests, where the calculated multi-family fee was significantly higher than the single-family fee (in Camas, Ridgefield and Washougal), keep in mind the school boards debated and considered the impacts higher multi-family fees might have on housing. The school boards have taken impacts on housing into account and forwarded requests to adopt multi-family fees that are lower than the calculated amount.

The majority of the housing that is going to be built in unincorporated Clark County will consist of single-family homes. Enclosed is a table that shows the impact fee amounts collected by Clark County in 2009, 2011 and what is being requested. Two things to keep in mind: (1) all the cities in Clark County have adopted the 2015 requested school impact fee amounts, and (2) all the single-family fees Clark County collected in 2009 are higher than the fees that are being requested in 2015, except in Hockinson and Ridgefield.

Quality schools are critical to the quality of life and viability of our community. The adoption of the CFPs, coordinated and collaborative land use planning, and collection of school impact fees is essential to the School Districts' ability to provide quality schools. On behalf of the School Districts, we appreciate your consideration and support of schools. Please adopt school impact fees in the amounts requested by the School Boards and that are being collected in the Cities.

If you have questions or would like additional information, please contact me. Thank you!

Sincerely,



Marnie Allen  
Legal Counsel

cc Clark County School Districts  
Enclosure

CLARK COUNTY SCHOOL DISTRICT  
2009 - 2015 SCHOOL IMPACT FEES

<u>DISTRICT</u>	<u>2009 CFP</u> <u>2010 - 2011 fees</u>	<u>2011 CFP</u> <u>2012 - 2013 fees</u>	<u>2015 CFP</u> <u>2016 - 2018 fees</u>
Battle Ground	SF \$9,880 MF \$3,500	SF \$5,128 MF \$2,649	SF \$6,397 MF \$2,285
Camas	SF \$5,528 MF \$3,269	SF \$4,460 MF \$2,604	SF \$5,371 MF \$5,371
Evergreen	SF \$7,169 MF \$3,069	SF \$6,989 MF \$2,678	SF \$6,100 MF \$7,641
Green Mtn	Sf \$3,387 MF \$0	SF \$3,387 MF \$0	SF \$3,387 MF \$0
Hockinson	SF \$5,906 MF \$1,617	SF \$5,906 MF \$1,617	SF \$6,080 MF \$2,781
La Center	SF \$6,991 MF \$2,626	SF \$6,991 MF \$2,626	SF \$4,111 MF \$5,095
Ridgefield	SF \$4,490 MF \$2,315	SF \$3,983 MF \$1,796	SF \$6,530 MF \$6,530
Vancouver	SF \$4,117 MF \$3,030	SF \$1,523 MF \$845	SF \$2,880 MF \$2,381
Washougal	SF \$5,857 MF \$4,795	SF \$2,683 MF \$2,689	SF \$5,600 MF \$5,800
Woodland	SF \$2,750 MF \$650	SF \$2,750 MF \$650	SF \$5,000 MF \$5,000

Prepared by Marnie Allen  
May 2016