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September 29, 2021

Marla Miller,
Deputy Superintendent
Shoreline School District
marla.miller@shorelineschools.org

Re: SWM Fee Education Credit 2021 Program Review

Dear Marla,

This letter briefly summarizes the activities, results, and recommendations of the City's 2021 Program Review of the Shoreline School District's SWM Fee Education Credit. Further detail on Program background, review, recommendations, and other supporting documentation can be found in Attachment A: SWM Fee Education Credit 2021 Program Review Memorandum.

The City of Shoreline (City) offers the Shoreline School District (District) the opportunity to provide surface water-related education to students in lieu of paying annual surface water management fees under the Surface Water Management (SWM) Fee Education Credit Program (Program). This fee exception is currently allowed for up to 100% of the assessed fees and was codified in the Shoreline Municipal Code in 2016, with a scheduled review date of July 1, 2021. The Program credit is documented within Section B.2. of the [Surface Water Management Rate Table](#), alongside the City's Municipal Code and other Fee Schedules.

Under the review, City Surface Water Utility (Utility) staff completed the following tasks:

Existing Program Summary to document the Program to date, including sections for Program History, Purpose, Existing SWM Fees for District Properties, and Program Curriculum. Required maintenance for District stormwater facilities, which is not associated with the existing Program, was described, including a 2020 NPDES permit non-compliance the City was required to report on, due to the District not completing all required maintenance. The Existing Program Summary is available in more detail in Attachment A.

Program Review key activities and results are summarized below, with more detail available in Attachment A:

- **SWM Fee Calculations:** Staff verified actual current hard surface area data for all District properties, which have not been updated since prior to 2011 despite numerous District site improvement projects since then.
 - *Result:* Pending 41.7% increase in District total SWM Fee amount following verified hard surface data. Using 2021 SWM Fee rates, the amount of this increase would be \$217,293.56.
- **Curriculum:** Staff conducted a detailed review of District-submitted coursework to check for alignment with approved surface water curriculum topics. This was the first time the City has conducted such a review; in previous years the City has reviewed District credit verification documentation only to confirm credit amount and for general coursework conformance.
 - *Result:* For the 2019-2020 school year, 35% of submitted coursework appeared insufficiently relevant to approved surface water curriculum topics, representing \$170,899.40 of 2020 SWM Fee credit. For the 2020-2021 school year, 24% of the submitted coursework appeared insufficiently relevant, representing \$130,306.75 of 2021 SWM Fee credit.
- **District Feedback:** The District provided feedback on the Program for the review, as solicited by staff.
 - *Result:* The District supported continuing the Program and requested that the City provide additional SWM Fee credits and exceptions to the District for parking lots, turf fields, stormwater facilities installed during redevelopment, and student clubs related to the environment. Utility staff provide responses to the District's requests in the Attachment A Memorandum.

Proposed Program Changes: Staff developed a variety of potential options to consider for the future of the Program, ranging from making no change (status quo) to discontinuing the Program. Based on the results of the review and subsequent internal City discussions, the following phased Program changes are proposed, to be rolled out over multiple years:

- **2021-22 school year:** no change, to facilitate implementation of upcoming phased changes.
- **2022-23 school year:**
 - Update District SWM Fee amounts based on the results of hard surface review and verification, expected to lead to a 41.7% increase in total District SWM Fees.
 - Provide a permanent full SWM Fee Credit without any credit requirements for District to fulfill for full and partial portions of District-owned properties in use by City as parks and recreation sites (expect to amount to roughly 8.8% of the District's total updated SWM Fees); City Parks will cover the SWM Fee arrangements for these properties.
 - Update approved Program curriculum to align more closely with key Surface Water topics.
 - Make the awarded SWM Fee Credit for each site dependent upon timely completion of all inspection-required maintenance; failure to complete inspection-required credit prior to deadline will result in loss of SWM Fee Credit for that site for the subsequent billing year.

- Allow SWM Fee Credit for Voluntary (not required by permitting) Stormwater Retrofits or other approved one-time projects in addition to or as an alternative to curriculum-only credits.
- **2023-24:**
 - Update coursework verification process to include City ability to award SWM Fee Credit based on relevant coursework and deny credit for irrelevant coursework.
- **2024-2025 school year (and beyond):**
 - Further Program changes may occur based on policy review, discussions, and recommendations to be done under the next Surface Water Master Plan (starting in 2022 and scheduled to be completed by early 2024) as part of the next SWM Fee rate study. This effort could also be used to align any future Program reviews to occur under the recurring Surface Water Master Planning effort, rather than as a standalone Program review.

The Attachment A Memorandum covers all the above review topics and recommendations in greater detail and includes additional documentation.

We look forward to further discussing the proposed Program changes, planning for implementation of Program changes, and answering any questions the District might have. We understand that the Superintendent may like to be included in a briefing on this issue. After the District has had a chance to review this letter and attached material, we would like to meet to walk through our analysis and answer questions with you and the superintendent -or- with you and then later with the superintendent. Please let us know how to best share this information.

Sincerely,



John Featherstone, City of Shoreline - Surface Water Utility Manager

cc: Dr. Susana Reyes, Shoreline Public Schools - Superintendent

Debbie Tarry, City of Shoreline - City Manager

Randy Witt, City of Shoreline - Public Works Director

Lance Newkirk, City of Shoreline - Utility and Operations Manager