

## **MEMO TO CITY COUNCIL**

From: Miranda Carson, Coordination Planner Meeting Date: January 3, 2022

**Topic:** West Ada School District Development Letter Changes

Recently West Ada School District (WASD) has been using a new format to make comments on development applications. I have met with WASD staff, read the explanation letter sent by Dr. Bub, and analyzed a few of the new letters. There are positives to the new letter format and some concerns with the new methodology to determine student generation rates.

I appreciate the expanded explanation in some letters regarding which schools are at or nearing max capacity. To my understanding this considers program capacity whereas the quantitative data in the table focuses more on the building capacity. Program capacity is a better indicator when determining if a school can handle increased enrollment.

The new letter format where applicable includes a list of options for increasing or balancing enrollment at schools that may exceed capacity. Dependent on particular schools and areas Council may see mention of portables, bussing opportunities, education program site changes, etc. These again are a beneficial qualitative data piece WASD and the City will want to consider when evaluating the impact, a development could have on enrollment.

Council may consider requesting future site plans for schools be added either to the letter or in the form of an annual/bi-annual update from WASD. This would shed light on where more capacity may be generated next.

My concern with the letter is not with the format, but rather with the new methodology to determine student generation rates (SGR). For certain larger projects the SGR will now be analyzed for specific areas and based on like current developments. My concern lies with *how* that the determination is being made. Data analysis can be done in many ways; however, reliance and accuracy are stronger when objective criteria are used. From my understanding the SGRs are being determined based on a subjective evaluation of a proposed development's likeness to 1 or more current developments. The surrounding area relative to a proposed development is also being evaluated on a subjective basis rather than any specific drive-out or straight-line radius.

Determining SGR specific to smaller subareas is a warranted next step, and I applaud WASD for beginning that analysis. I think the current subjective approach could be refined, and should be before applying this to development comment letters.

Lastly, in regards to any recent letters: should Council be presented with additional resources (be it from me or a citizen), I would suggest Council rely first on the WASD letter in the Citizen's Access Portal for the most up to date information. While the discussion of statistical methodologies can and will continue, WASD is ultimately the agency responsible for producing these analyses.

Please let me know if you have any questions.