



December 31, 2014

Pierce County Planning and Land Services
Adonais Clark
Senior Planner
2401 South 35th Street
Tacoma, WA 98409-7460

RE: Silver Creek Apartments Site Development Permit Application #791936

Dear Mr. Clark:

Thank you for the opportunity to comment regarding the above-referenced new residential development application. The project proposes to construct 182 apartment units on the southwest corner of the 176th St E / Gem Heights Drive intersection, otherwise known as Phase 7 of the Silver Creek Planned Development District (PDD). Although this site is currently designated for development as a commercial site under the C-3 zone classification, comments from the county within the June 27th Major Predevelopment Meeting letter state “the proposed use is permitted outright....in the C-3 zone. No amendment to the approved Master Plan is required.”

The development is expected to generate a relatively modest number of K-12 students attending Puyallup School District schools when compared with the 182 units to be constructed. The District’s Facilities Planning Department has tracked the number of students that reside in similar multi-family projects that are now fully developed to create a student generation calculation. Using said calculation, the district estimates the completed project will add an additional 34 students K-12, broken down by grade level below:

- 20 elementary students
- 7 junior high students
- 7 high school students

The Phase 7 site / Silver Creek Apartments proposal is currently located within the Carson Elementary, Stahl Junior High, and Rogers High School service areas. The site is located within the walking areas for both Carson Elementary and Stahl Junior, therefore no school bus service would be provided for students attending these schools. School bus service is currently provided in this neighborhood for high school students attending Rogers High School. The District’s Transportation department does not plan to route a school bus within the development. Rather, a future school bus stop will need to be established along Gem Heights Drive, near the proposed site entrance, to serve these students in the future.

The District does have concerns regarding the impact this development may have, particularly at the elementary level. The concerns are based on the following information:

- Carson Elementary has an enrollment of 980 students. The school was designed for a maximum capacity of 675 students when running a full-day Kindergarten program. The school is currently overcapacity 305 students. The school does not have the existing capacity to serve the estimated 20 additional students.
- The school is serving a portion of the 980 students within seven temporary portable classrooms. The temporary classrooms have crowded the site, leaving undesirable options for locating additional temporary classroom locations onsite.
- Temporary classrooms provide only 50% of the needed space the occupant students and staff require. Temporary classrooms do not provide for additional restrooms, cafeteria space, hallway corridor space, pick-up and drop-off areas, etc., that would be provided for a school designed for 980+ students.
- Puyallup School District has run four bond elections over the past ten years. Each bond proposal included a project to build a new elementary school in the South Hill area west of Meridian to serve the growing elementary student population in this region. All four bond elections failed to meet the 60% supermajority required for bond passage.
- Additional vehicle trips to and from Carson Elementary (for parents that prefer to drive their student to/from school) will add to traffic congestion experienced in the Silver Creek community during peak drop-off and pick-up hours. This would be in addition to a planned county road project to extend 184th St. E. to connect with 78th Ave. E. that will likely add vehicular traffic within the Silver Creek community, including the frontage roads abutting the Carson Elementary site.
- The Carson Elementary service area borders the Bethel School District to the west and south. The adjacent PSD elementary service areas to the east and north (Edgerton Elementary and Brouillet Elementary, respectively) include schools that are also currently utilizing temporary classrooms to serve school facilities operating over capacity. Furthermore, Brouillet Elementary is located within the Thun Field Zone 6 overlay zone, precluding the installation of additional temporary classrooms. In summary, there are no good options to alleviate the enrollment population at Carson Elementary via an attendance area line adjustment.

In conclusion, the Puyallup School District is not advocating for or against this proposed development. The intent is to communicate the realities of current circumstances and the share the projected impacts this project will create to our schools and the neighborhoods they serve.

The District is interested in receiving updates related to the building schedule for our planning purposes. Please make the District a party of record for updates and future documents related to this development.

Sincerely,



Brian Devereux
Planning Director

cc: Tim Yeomans, PSD Superintendent
Casey Cox, Assistant Superintendent
Cathy McDaniel, Director of Transportation
Judy Piger, Carson Elementary Principal
Deka Smith, Region 2 Chief Academic Officer
Rudy Fyles, Chief Operations Officer