



American Planning Association  
**Washington Chapter**

*Making Great Communities Happen*

January 27, 2026

The Honorable Davina Duerr  
Local Government Committee  
Washington State House of Representatives  
Olympia, WA

Subject: Comments on House Bill (HB) 2459

Dear Chair Duerr,

I am writing on behalf of the American Planning Association, Washington Chapter (APA WA) in **opposition to HB 2459**. Our approximately 1,400 members are planning professionals who advise elected and appointed officials on land use, transportation, economic development and environmental policy; enforce development regulations; administer the permit process; and provide public information to and engagement with our constituents regarding growth and change to cities, towns, counties, non-profit organizations and more.

HB 2459 would ban countywide or multicounty planning policies that prohibit the siting of new schools in rural areas if certain criteria are met, i.e., students served are from an urban area and the new school will be contiguous to an existing school (Sec. 1 (1.)). It would also not prohibit the siting of a new school in the rural area if those conditions are met (Sec.2 (2.)). Finally, this bill would not allow counties or cities to deny extension of public facilities or utilities to new school sites if a school district's proposed site is contiguous to the site of an existing school within the district (Sec. 2 (1)(c.))

This bill does not align with APA WA's legislative priority of ensuring coordinating planning between special purpose districts and local governments. Specifically, APA WA supports siting schools and other public facilities within the Urban Growth Area (UGA) when the school district includes both urban and rural land. Further, we support including special purpose districts in the local planning processes, which would include the designation of UGAs.

APA WA, therefore, opposes HB 2459 as written, and we offer the following comments:

- By making it easier for school districts to locate schools outside the UGA, this bill undermines cities and counties comprehensive plans and their ability to curb sprawl. Larger sites outside UGAs may be easier to find and appear less expensive, but other cost considerations make siting outside of UGAs more expensive, including busing services, extension of water and sewer lines, and added road improvements.
- Expensive water and sewer lines outside of UGAs give sewer and water providers motivation to add nearby land and customers outside of UGAs, thereby increasing sprawl-like development and pressure to expand the UGA.

- Schools generate substantial traffic and should be sited in areas with sufficient transit and pedestrian and bicycle connections to their attendance areas, which helps to make Safe Routes to Schools programs feasible. Locating schools within UGAs helps to reduce emissions from dedicated school transportation vehicles and parents driving children to school.
- Building schools closer to denser housing areas increases the potential for walking or bicycling at a time when our public health policies are being directed at promoting physical activity and fitness.
- Siting schools outside the UGA also works against cities' efforts toward higher densities and containment of sprawl. These efforts are being realized throughout the state and are resulting in increasing transit use, reductions in carbon emissions and decreased energy usage.

Again, APA WA enthusiastically supports coordinated planning between special purpose districts and local governments. However, as written, this bill does not further that goal. We, therefore, **oppose HB 2459**.

Thank you for your consideration.

Respectfully,



Anne Broache, President  
American Planning Association, Washington Chapter  
2150 N 107th Street Suite 205  
Seattle, WA 98133-9009