

February 28, 2018

Ryan Windish, AICP
Community Development Director
City of Sumner
1104 Maple Street, Suite 250
Sumner, WA 98390-1423

Re: **Sumner School District: Sumner High School Modernization, 1707 Main Street¹
Application for Special Exception for Height [Pre-Application No. PRE-2017-0008]**

Dear Ryan:

I. Summary of Height Exception Request

In conjunction with the Sumner School District's (the "School District") Application for a Conditional Use Permit for the permitting of the modernization and addition to Sumner High School's existing campus and the adjacent proposed Elhi Hill Educational Program, the School District is seeking, as specifically described herein, a Request for Special Exception for Building Height on the Sumner High School existing campus, as allowed under Sumner Municipal Code (SMC) 18.50.040. The Height Exception is requested for two areas: (i) the proposed "Three Story Academic Wing", and (2) the proposed replacement "Library" (to be housed within the second story of a portion of the area identified as the "Commons"²). Attached is an Illustrative Diagram depicting the locations of these two areas wherein height exceptions are sought by this Special Exception Application to accommodate necessary educational functions. Also attached are Elevation Drawings, showing a detailed drawing of the proposed heights of the Three-Story Academic Wing and the Library consistent with the height definition under SMC 18.04.0205.

The existing High School campus is located within the Low Density Residential – 12,000 (LDR-12) Zoning Classification under a Public-Private Utilities and Facilities Land Use Comprehensive Plan Designation. The LDR-12 Zone sets forth a 30 foot height standard. However, this 30 foot standard may be exceeded for certain allowed uses in a LDR-12 Zone such as churches and schools to a maximum building height of 50 feet. The School District seeks a 16'.7" height deviation above the 30 foot height standard for the Three Story Academic Wing and a 8'10" foot height deviation for the Library.

¹ 1707 Main Street is the address for the existing High School campus.

² The "Commons" is a flexible area to serve lunch to students and provide a gathering place for educational activities.

The need to serve educational functions appropriate for a high school which require deviations to the City's customary height standard (in a residential zone) has been recognized by the City of Sumner by the various permitted buildings on the Campus. Both of these requested height deviations are consistent and compatible with the existing heights on the existing campus of the Sumner High School: (i) the roof line of the Performing Arts Center raises in steps to 56', (ii) the Stadium roof over the (home) bleachers raises to an elevation of about 41', and (iii) the two-story classroom wing and the gymnasium have a maximum height of about 38' and 35', respectively (facing Main Street).

In addition, planning principles within the core area of a city (an Urban Area) under the Growth Management Act ("GMA") encourage compact urban development to reduce sprawl and provide for cost-efficient use of services and resources. Associated with this planning principle, is the GMA's direction to cities to plan for and encourage civic uses, including schools, in the Urban Growth Area (RCW 36.70A.150). The City, consistent with these planning principles under the GMA, is recommending Comprehensive Plan Amendments in 2018 which would change the zoning and height standards on land abutting the Main Campus both westerly and easterly.³ Multi-Family Zoning Districts with three to four stories are proposed along the westerly boundary of the existing Campus and a Mixed-Use Commercial and Residential Zoning District with a 55' height standard is proposed on the easterly boundary of the Main Campus⁴.

Therefore, the District's height deviation request is necessary for educational purposes and consistent with planning principles as more fully described below.

II. Pertinent City Code Provisions re Building Height

Although there is an existing customary 30' height standard under the LDR-12 Zone (SMC 18.12.070H), the starting point of the inquiry is review of the City's Code to determine the method of calculating building height and the recognition of special consideration for certain uses such as churches and schools.

SMC 18.04.0205 defines "building height" based upon the type of roof. SMC 18.04.0205 states:

'Building height' means the vertical distance from the existing or finished grade, whatever is lower, at any point on the building perimeter to the highest point of the underside of the ceiling beams in the case of a flat roof; to the deck line of a mansard roof; and to the mean level of the underside of the

³See <http://sumnerwa.gov/virtual-open-house-town-center>; "Town Center Plan" and associated additional Comprehensive Plan Amendments, dated February 20, 2018.

⁴Based upon the February 20, 2018 City planning presentation, the District understands that, in anticipation of a change to the City's Comprehensive Plan, application has been submitted on the property (known as the Brinks parcel) adjacent to the existing Campus' easterly boundary for a mixed-use commercial and residential development at a height of 55 feet.

rafters between the eaves and the ridge of the gable, hip or gambrel roof.
(Emphasis added.)

In addition, the LDR Zone recognizes the need for “special performance standards” for certain uses. The Low Density Residential Zoning District contemplates that schools and churches (allowed as Conditional Uses in the LDR-12 Zoning District) because of unique programmatic needs, core design features, and operational system requirements to support programmatic features customarily may likely exceed standard building height limitations in a LDR Zone. This need is further recognized because smaller parcels in a low-density zone necessarily require compact and efficient development. Therefore, SMC 18.12.080 acknowledges that certain building structures, to appropriately serve school and church uses, are unique and that the existing standard height limitation in a LDR Zone may be exceeded to a maximum of 50 feet.

SMC 18.12.080L provides the following “special performance standard”:

. . . a height exception shall be applied for as part of a conditional use permit application to establish such uses or expansion of such uses. Conditionally permitted school and church uses *may exceed building height requirements to a maximum of 50 feet in the LDR zone* upon approval of such height exception by the hearing examiner. A height exception does not require separate application for a special exception or variance. (Emphasis added.)

III. Special Use Exception Criteria

This Code framework, in conjunction with the requirement for consistency with planning principles under the GMA, therefore, provides the context for consideration of the Criteria under SMC 18.50.040 (Special Exceptions).

A. The requested deviation from the code standards is necessary for the successful physical function of the proposed use.

Sumner High School has been established in the central core of the City since the early 1900s.⁵ The District acquired additional land over the years and the Sumner High School moved to its current location with the last addition occurring in 1992 with minor remodeling in 2001. With the substantial population growth in the 2000s experienced by Sumner School District, like other school districts in Pierce County, permitted portables, intended as only temporary facilities, became necessary to house the increased student population. There are currently eight double-wide (8) portables located in the area referenced as the North Parking Lot.

⁵Sumner High School was established in 1911 on Main Street in the area that is now the ballfields adjacent to Wood Avenue.

In 2015 with the planning associated with running a Capital Bond in 2016, the School District's Facilities Planning Committee, comprised of School District staff, Community leaders, parents, and students, prioritized the modernization of and building a sufficient addition to the existing High School Campus in order that there was sufficient classroom capacity to house all students within a school building. These two critical objectives: modernization of space and replacement of portable classrooms provide for appropriate, flexible, and functional learning spaces, necessary technology, and the expansion of educational programs to serve innovative teaching methods to allow for interdisciplinary programs and collaboration. Moreover, allowing students to receive education in a collective building encourages cohesiveness, team building, and socialization of a diverse student body.

To accomplish these necessary and specific educational goals and maintain open space for physical education, athletic events, and community use on the Campus and provide for additional on-site parking capacity, requires a Three-Story Academic Wing and a 21st century Library (as the second story of a portion of the Commons). This higher floor to area ratio serves these purposes to accommodate a 1830 student body on an approximate 26.8 acre site⁶.

The proposed height exception will allow the School District to be more efficient in the design to: (i) enhance efficiency in student circulation between classes, resulting in less travel time between classes and programs, (ii) ease congestion in the hallway corridors, and (iii) substantially improve energy efficiency as there is significantly less exterior surface area in relationship to the interior area (thereby reducing the heat exchange loss through exterior surface area). In addition, the proposed height exceptions will provide for the design opportunity for large clerestory windows to allow natural lighting and a passive solar energy approach during the hotter parts of the day – allowing the walls and the floor to act as a heat bank during the cooler parts of the day. Moreover, the natural lighting provides an environment which has been shown to promote alertness and attentiveness of students in the educational setting.

The School District building standards, in the nature of a gable roof structure, create architecture appropriate for cost effective maintenance of educational buildings and which is also compatible with the architecture of the existing Campus and surrounding residential area.

B. *Reasonable alternatives which result in reduced or no deviation from the code have been considered.*

The School District Architectural Team considered alternative building height approaches during the design phase of the modernization and addition to the Main Campus. These alternative approaches would have resulted in additional one or two story style buildings and clearly would have

⁶26.8 acres includes the additional 1/3 of an acre of land acquired by the School District on Wood Avenue (1111 and 1101 Wood Ave.) for a new parking lot. The School District has also recently acquired three other parcels on Mason Street which are referenced in the Conditional Use Permit Letter Application to be used for construction staging as described under the Construction Management Plan attached thereto.

displaced a substantial portion of the athletic fields on the Main Campus which now serve both students and the Community of Sumner arising from the additional land area necessary for one or two story style buildings and arising from the need to maintain and add additional parking. A sprawling building system with one or two story additions to the Campus would have resulted in a rabbit warren-like effect and decreased circulation efficiencies. Energy efficiencies, as discussed above, would not have been realized.

Moreover, compact development (building capacity to total land area) allows the siting of an emergency access drive aisle to and along the westerly boundary of Sunset Stadium to provide access to Washington Street; a feature which provide a safety enhancement for events at Sunset Stadium and the Campus. In addition, the two-story feature to house the Library (a portion above the area known as the Commons) creates a distinctive and attractive architectural component and draws students to the center (heart) of the High School.

C. The granting of such deviation will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity and in the zone in which the subject property is situated.

The School District has thoughtfully and consciously designed the modernization and addition to the Main Campus. The Three-Story Academic Wing is significantly set back (about 225 ft.) from the northerly edge of Main Street or a total of almost 300 feet from the southerly residential LDR-7.2 Zone (inclusive of the ROW) and is oriented north and south on the easterly end of the campus facing Sunset Stadium. This north-south orientation (the longest side) of the Three-Story Academic Wing, therefore, connects to the East Main Street area which is planned, as part of proposed Comprehensive Plan Amendments, to be regulated with a height limitation up to 55 feet. Indeed, there is a proposed mixed-use commercial and residential development adjacent to the Main Campus' easterly boundary with a proposed height of 55 feet. In addition, the westerly side of the Three-Story Wing is interior in the Campus and the northerly side is also a significant distance from Mason or Washington Streets. Similarly, the Library (which is a second-story portion of the Commons) sets back approximately 230 feet from the northerly boundary of Main Street and approximately 300 feet from the southerly residential area (inclusive of the ROW). This substantial setback creates a stepped transition area and visual separation from the residential area south of Main Street. In addition, the window pattern design of the Library coupled with large windows facing Main Street modulates any street presence of the building and, therefore, the Library portion of the Commons will appear more ornamental in nature.

As discussed above, the Main Campus has several existing buildings which exceed the 30 foot standard height in an LDR-12 Zone. The height of the fly loft-flat roof of the Performing Arts Center (inclusive of an attached mechanical area) is 56' 10"; the roof of the Sunset Stadium (home side) bleachers raises to an elevation of about 41', the maximum height of the gymnasium is about 35'; and the maximum height of the existing two story classroom wing is about 38'. All of these building

height elements are well-established features of the existing Campus which have not created any adverse impacts on the surrounding area.

Therefore, given the context of the existing buildings on the existing Campus, the design features and the location of the Three Story Academic Wing and the second story portion of the Commons to house the Library, the height deviation request will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity. The construction of a Three Story Academic Wing and second story portion of the Commons for the Library will create a benefit to the surrounding area by preserving open space on the Main Campus.

D. *The proposed special exception is consistent with the city's comprehensive plan.*

The proposed additions to the existing High School Campus are consistent with the City's Comprehensive Plan in several respects. The existing site of the Main Campus is designated under the City's Comprehensive Land Use Map as "Public-Private Utilities and Facilities." The City's Comprehensive Plan establishes that the primary purpose of this land use designation is to identify lands appropriate for siting public and private utilities, facilities and services. Allowable uses include parks, schools, open space, medical facilities, non-profit service uses/organizations, public and private utilities, and government buildings. Therefore, a site designated with a "Public Facilities" land use designation is intended to be utilized for the primary purpose of providing a public benefit or service which is exactly the purpose of the modernization and addition to the existing Campus of Sumner High School. The modernization and addition Project: (i) replaces housing students in temporary and isolated portable classrooms, (ii) provides adequate and appropriate classroom space to expand needed special education programming, science laboratories, music instruction, performing arts instruction, printing and graphic art instruction, and (iii) importantly, unifies the student body to encourage collaboration and team building in flexible learning spaces like the Commons and the Library. Strong architectural design enhances student learning and innovative educational programming.

The purpose of the Public Facilities land use designation is built upon the policies under the City's Comprehensive Plan which expressly identify "Education" as a specific "Value" to be supported and encouraged. At page 22 of the Comprehensive Plan, recognition of the importance of education is acknowledged:

Our public school system is at the center of our community. It is a source of pride and provides identity for our City, education to our young people, resources for our citizens, and a future for all. We strive for our own broad educational system open to everyone.

In addition, the Comprehensive Plan further recognizes under the Community Character Element (see page 55) that a "complete community" includes the integration of "schools", "civic

facilities”, and “community services” “essential to the daily life of residents” (Land Use Sub-Element, Policy 1.2). The Comprehensive Plan Policies include the following:

Land Use Sub-Element

Policy 1.3: Through the Land Use Plan and Community Character Element, strive to balance, residential, commercial, industrial and public land uses.

Community Character Element

Policy 1.2: Endeavor to maintain a complete community, consistent and compatible in character and design, containing housing, shops, work places, schools, parks, civic facilities, and community services essential to the daily life of residents.

Capital Facilities and Public Services Element

Goal 1: Provide effective, efficient and quality capital facilities and public services at the level necessary to support a growing community.

These Policies are coordinated with and balanced by the Policies set forth under the Parks and Open Space Element of the City’s Comprehensive Plan. The Comprehensive Plan has adopted policies which look to cooperation and coordination between the City and Sumner School District to maintain and preserve District existing recreational opportunities.

Parks and Open Space Element

Policy 1.4.1: Continue to cooperate with the Sumner School District to develop and maintain facilities which are available to the general public.

Goal 2: Preserve, protect, and enhance significant open space.

Policy 2.5 Educate the general public about the values of open space and the role it plays in the community, including education programs through the Sumner School District and area child cares, public access to critical and unique open spaces, and support for public environmental education programs.

These Parks and Open Space Policies recognize that sprawling development reduces space for land for recreational opportunities⁷. Therefore, this balanced approach under the City’s Comprehensive Plan supports more compact development in the central core of the City in the nature of vertical construction, as appropriate, to maintain and preserve existing open space for public access and parks.

⁷The City’s Comprehensive Plan provides emphasis on “youth programs” to nurture healthy living early in life to provide a foundation for incorporating activity into one’s life to ensure healthy living (*see* Family and Human Services Element, Introduction, at p. 120, Policy 2.5 at p. 124, and Goal 4 at p. 125).

This approach of protecting open space for recreational opportunities is further established through the City's Community Character Element of its Comprehensive Plan which provides:

Goal 6: Promote a compatible and varied mix of land uses:

Policy 6.1: Promote a compact development pattern that exhibits variety in building types and scale. Historic and vernacular architectural styles should be respected. Both sides of the streetscape should complement each other. (Emphasis Added)⁸

Thus, the School District's guiding principles in planning the needed modernization and addition to the existing Campus of Sumner High School to preserve its existing fields through more compact vertical, construction is consistent with the policies of the City's Comprehensive Plan and implements the goals of the Growth Management Act.

IV. Conclusion

Sumner High School has long been established in the central core of the City of Sumner. The proposed modernization and addition to the Sumner High School Campus located at 1707 Main Street maintains a valuable educational resource for the Community. The Project provides a balance of creating additional instructional space and preserving open space for recreational opportunities for its students and the Sumner Community which planning principles are strong values under the City's Comprehensive Plan. The Project implements the Comprehensive Plan policy of providing "efficient and quality capital facilities and public services at the level necessary to support" the Community. The requested height deviations are necessary to provide an efficient and successful learning environment by creating architectural continuity within the Campus and compatibility with the surrounding area. The substantial setback (approximately 300') and architectural treatment of the Library with large windows over a portion of the two-story glass enclosed Commons will provide an inviting connection between the westerly and easterly wings of the Campus without bulk or a standard 30' tall, two story sprawling buildings. The street presence along Main Street will be modulated and enhanced. The north-south orientation of the Three Story Academic Wing coupled with a substantial setback (approximately 300') from the residences along (the south side of) Main Street and the substantial distance from Mason and Washington Streets ensures compatibility with the surrounding area. The north-south lineal orientation of the 46' 7" Three Story Academic Wing looking east is further consistent with the City's proposed 55' height standard for the adjacent East Main Street area.

Thus, the School District's Request for a Special Height Exception to provide a deviation from the 30 foot height standard for the Library portion of the Commons to allow a 38' 10" tall building and for the Three-Story Academic Wing to allow a 46' 7" tall building satisfies the criteria under SMC 18.50.040.

⁸Also see p. 5 of the City's Comprehensive Plan which recognizes the requirement of consistency with the Countywide Planning Policies which acknowledges that compact urban development is a goal of the GMA.

Ryan Windish
Request for Special Exception
February 28, 2018
Page 9

If you have any questions, please do not hesitate to contact me.

Very Truly Yours,



Douglas J. DuCharme, AIA LEED AP
Associate Principal
BLRB Architects

Enclosures

cc: Steve Sjolund, Executive Director, Educational Support Services
Sumner School District (w/enclosures)