

March 2, 2018

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City of Sumner
1104 Maple Street
Sumner, WA 98390-1423

**Re: Projects: Sumner High School Modernization
Elhi Hill Educational Program (Change of Use)**

**Application: Conditional Use Permit
(Pre-Application No. PRE-2018-00008)**

Dear Ryan:

I. INTRODUCTION

This letter serves as the Application for a Conditional Use Permit (“CUP”) under Sumner Municipal Code (SMC) 18.48.050 for the modernization and addition to Sumner High School on the existing High School Campus and for the relocation of the Elhi Hill Educational Program to an existing building and adjoining property acquired by Sumner School District (collectively, referred to herein at times as the “Project” or individually, as each “project”). The Project is located: (i) on the existing campus of Sumner High School (1707 Main Street East¹) and certain adjoining parcels on Wood Avenue² and Mason Street³ that have been acquired by Sumner School District (the “School District”) and (ii) the site of a former medical clinic (known as the Multi-Care Clinic) located at 1518 Main Street together with adjoining parcels acquired by the School District to relocate the Elhi Hill Educational Program (the “Elhi Hill Program”)⁴. Attached hereto is the required CUP Site Plan with information for the Project and an Aerial Map of the Project.

¹The existing Sumner High School Campus located at 1707 Main Street is known as Parcel No. 0420244205.

²There are two adjoining parcels located at 1111 and 1101 Wood Avenue (Parcel Nos. 4445000020 and 4445000010, respectively) acquired by the School District to provide expanded parking in conjunction with the Project.

³As shown on the CUP Site Plan and the Aerial Map of the Project and as described more fully below, the School District has acquired three parcels on 1424, 1428, and 1506, Mason Street (Parcel Nos. 4445000060, 4445000070, and 4445000110) for use as construction staging areas in accordance with its proposed Construction Management Plan set forth herein below (Criteria E). There will be no improvements associated with these parcels and therefore, these parcels are not included, at the present time, in the acreage associated with the modernization of the Sumner High School.

⁴The former Multi-Care Clinic (which currently houses office space for the School District) is located at 1518 Main Street (Parcel No. 2350000060) and the adjoining parcels located at 914 Meeker Avenue (Parcel No. 2350000100) and 908 Meeker (2350000110) will be used for a new parking lot for the Elhi Hill Program as described more fully below.

The existing High School Campus is designated under the City's Comprehensive Plan Land Use Map as Public-Private Utilities and Facilities with a Low Density Residential – 12,000 (LDR-12) Zoning Classification. Within a LDR-12 Zoning Classification, school uses are treated as a “secondary allowed use”⁵ upon approval of a Conditional Use Permit (“CUP”; SMC 18.12.040E) consistent with criteria established under SMC 18.48.050. Similarly, the proposed adjoining Wood Avenue Parking Lot and the Mason Street parcels are all designated under a Medium Density Residential Zone which allows educational uses under a Conditional Use Permit (SMC 18.14.040E). The Elhi Hill Program proposed to be served in the former medical building is located on property designated under the Central Business District Zone with the associated parcels proposed for a new parking lot under a Central Business District Zone and a Low Density Residential – 6,000 (LDR-6) Zone. Both zoning classifications allow school uses under a Conditional Use Permit (18.16.020(47) and 18.12.040E)

The overarching purpose of a CUP as set forth under the Purpose Section of SMC ch. 18.48, consistent with the City's Comprehensive Plan Land Use Element, is merely to establish a special review procedure and consideration for uses that are otherwise a “permitted use”. SMC 18.48.010. As shown in detail below and under the Reports and mapping attached to the Expanded State Environmental Policy Act (“SEPA”) Environmental Checklist, the School District has engaged the necessary consultants in transportation, lighting, noise, civil engineering, and architecture to determine that such special review has been appropriately conducted to establish that there are no significant adverse or detrimental impacts to the surrounding area. The School District has carefully and thoughtfully designed and imposed conditions as part of the Project being mindful of the community.

II. PROJECT DESCRIPTION

A. Background

Sumner High School has been established in the central core of the City of Sumner (the “City”) since the early 1900s.⁶ The District acquired additional land over the years and the High School moved to its current location with a new high school building in 1954, the Stadium was constructed in 1958, a swimming pool was constructed in 1970, the Performing Arts Center was constructed in 1982, a modernization and addition with expansion of the gymnasium occurred in 1992, and minor remodeling occurred in 2001. The High School building is largely dated. In addition, 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 interim, classroom facilities, became necessary to house the increased student population. There are

⁵City Comprehensive Plan at page 40 (Land Use Designations, Residential, Low Density).

⁶Sumner High School was established in 1911 on Main Street in the area that is now the ballfields adjacent to Main Street and Wood Avenue.

currently eight double-wide (8) portables located in the area referenced as the North Parking Lot on the Site Plan.

In 2015, planning for a Capital Bond ensued and the School District assembled a Facilities Planning Committee, comprised of District Staff, teachers, parents, Community leaders, and students to assess educational and space needs in existing facilities with the intent to maximize resources by modernizing and adding space as necessary to replace existing interim classroom facilities and for programming. The Facilities Committee prioritized funding for the modernization of Sumner High School given the need to expand classroom space to re-unite the student body housed in the existing portable classrooms into functional classroom space, the outdated teaching spaces and support services, and the need to expand and relocate the cafeteria area (known as the Commons) to allow the student body to convene during the lunch hour into two shifts in lieu of being scattered throughout the high school, to expand the library to provide for flexible programming and technology, to add additional classroom space for science, specialized instructional space for performing arts, industrial and illustrative arts programs aided by technology, music programs, and additional flexible areas for interdisciplinary study and activities to foster collaboration, and all coupled with associated support services and circulation areas.

With the passage of the Capital Bond in 2016 providing for modernization of Sumner High School, the School District searched for an opportunity to join and re-connect the Elhi Hill Educational Program with the High School to maximize resources and expand opportunities for student development. The opportunity arose when the former Multi-Care Clinic and adjoining parcels on Meeker Avenue located across Main Street from Sumner High School became available. Re-locating the Elhi Hill Program provides convenient access to bus transportation services, additional resources and activities for its students, the ability to easily attend classes offered only at the High School, and to be part of the community of Sumner High School to promote social, emotional, and academic development as appropriate to the Elhi Hill students.

The Elhi Hill Program with the modernization of the High School creates a comprehensive, state-of-the-art high school facility to house its students in permanent, functional instructional space with necessary support services and additional resources for high school students that desire or need additional support in the specialized Elhi Hill Program to allow the tradition of achievement and community involvement to continue to successfully grow from the core of the City of Sumner.

B. Detailed Project Description

1. Existing Sumner High School Campus

A modernized Sumner High School will house a capacity of 1830 students (inclusive of the Elhi Hill students), an increase of 33 students beyond its current student population of 1797

students.⁷ The existing High School Campus project will re-locate students from the existing interim, portable classrooms currently located on the North Parking Lot (see CUP Site Plan) to permanent, functional space and will modernize the High School Building to:

- (i) provide a learner-centered environment with a variety of learning spaces and multi-functional rooms like the Commons, flexible seating arrangements for presentations and smaller group interaction, spaces for working quietly, and support services for students and administration;
- (ii) support a quality of education for both academic and socialization development through new multi-purpose spaces, flexible planning areas, and new technology;
- (iii) foster pride and spirit through display opportunities for student work built into new and refreshed areas, a hall of fame, and celebration of former students;
- (iv) provide for a safety and security measures through a controlled new entrance to the school with new technology, restricted access areas, and new drop off area and bus loading and unloading areas;
- (v) provide a design with future adaptability through space planning, multiple technology platforms, connectible and upgradable infrastructure to allow for new teaching methods and instruction and curriculum; and
- (vi) provide for environmental sustainability and stewardship through use of automatic lighting controlled by motion sensor, clerestory windows in the new Commons, Library, and Three Story Academic Wing which will provide natural lighting and energy efficiency. In addition, all exterior and interior lighting will use LED lighting. Exterior lighting will also be equipped with full-cut off fixtures to direct the lighting down and to minimize light spillage beyond the perimeter of the property boundaries. In addition, all lighting will be controlled by the School District's Standard Operating Procedure to minimize the hours of operation consistent with maintaining safety and security and to ensure illumination is dimmed to 50% unless motion is detected (all exterior lighting is equipped with motion sensors) and operational only during necessary hours.

In conjunction with modernization of the High School, approximately 70,393 sq. ft. of the current building's 183,350 sq. ft. will be demolished and rebuilt and approximately 51,922 sq. ft. of new space will be added for a total of approximately 235,272 sq. ft. of space with the modernization. In addition, the two existing houses located on the Wood Avenue parcels will be

⁷The June 2017 enrollment as reported by the Office of the Superintendent of Public Instruction.

demolished for additional parking (the new “Wood Avenue Parking Lot”). Interior refurbishment will also occur throughout other areas of the High School.

Demolition will occur in the following areas:

(i) the existing small Commons area and attached kitchen area which will be replaced with flexible classroom space for interdisciplinary learning and collaborative learning opportunities and special education;

(ii) the existing music and support services areas which will be relocated to re-built classroom space and the former space of the music area will be re-built for physical education activities, printing and illustrative/graphic design classroom space, support services, and a new kitchen area;

(iii) the existing front courtyard area and an adjoining area which will be demolished and enclosed with a two-story Commons Area to be used as a cafeteria to allow students to receive lunch in one space instead of available nooks and crannies through the school building as the current cafeteria is undersized. Importantly, the Commons will also provide a core hub for student interaction and activities occurring in a flexible space with an additional one-story Library (over the northerly portion of the Commons with a height approximately 8’10” above the standard height in a LDR-12 Zone)⁸;

(iv) an existing one-story classroom wing facing the Stadium which will be rebuilt as a new Three-Story Academic Wing housing science rooms and general classroom space (with a height of approximately 16’7” above the standard height in a LDR-12 Zone)⁹; and

(v) the swimming pool building which will be demolished and replaced with two (2) new tennis courts surrounded by new paved areas to accommodate existing seating.

The main entry will be re-oriented and re-constructed to clearly identify the main entrance of the High School with a vestibule to provide a control point of entry to the building for safety and security purposes. With the modernization Project, traffic separation of buses and automobile traffic has been provided to enhance safety and improve traffic conditions. School bus loading and unloading will be relocated away from its existing location (in the loop on the north side of Main Street) to new areas on-site (northwest of the school building) for special education buses and on-street to the north of the school building (south side of Mason Street along School District owned frontage). Curb side access along the front of the building will be provided with parent/visitor parking available in a new parking area. Student and staff parking will increase from

⁸See Height Exception Request, dated February 28, 2018.

⁹See Height Exception Request, dated February 28, 2018.

the existing 464 spaces to 644 spaces (existing High School campus) with new parking available on the new Wood Avenue Parking Lot, an increase in available on-site parking in the North Parking Lot with the removal of the existing, interim portables and the restoration of parking stalls upon completion of the Project, and with parking stalls constructed within the new parking area on Main Street in front of the high school building. All existing 11 access locations to the existing Campus will remain unchanged.

The entrance to the existing Performing Arts Center (“PAC”) will be re-located to the northwesterly area of the PAC and will be oriented toward the North Parking Lot and the West Parking Lot for ease of access to these parking areas which will be connected by a new paved plaza and walkway area. A new, lighted walkway connection between the new Wood Avenue Parking Lot and the High School will be constructed as part of the Project. The easterly fast pitch field (located west of the West Parking Lot) will be shifted south to accommodate a new pathway from the new Wood Avenue Parking Lot to the High School and PAC to support use of the new Wood Avenue Parking Lot.

The exterior finish of the modernized building and new additions will be compatible with the surrounding area by use of materials consistent with a Northwest architectural style, including wood-grain cement board, brick masonry, and metal siding. The use of gable roof lines on the new additions, a common feature, in the surrounding residential area will provide compatibility and harmony with the residential areas to the south (along Main Street) and the north along Mason and Washington Streets). The materials of the existing building and the additions will provide visual and aesthetic continuity. Large clerestory windows (with metal trim) used in the Commons and Library facing Main Street will modulate the building’s appearance and provide an ornamental element. The long axis of the new Three-Story Academic Wing will be oriented north-south and will face Sunset Stadium. Similarly, large clerestory windows enclosing a stairway in the new Three Story Academic Wing which will be visible along the south side of the Academic Wing facing Main Street will also provide modulation and an ornamental element.¹⁰ The need to serve educational functions appropriate for a high school require deviations to the City’s customary height standard (in a residential zone) for the Library portion of the Commons (proposed 38’ 10”) and the Three-Story Academic Wing (46’ 7”).¹¹ Both of these requested height deviations are consistent and compatible with the existing heights on the existing campus of 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).

¹⁰See Exterior View Renderings (attached).

¹¹See School District’s Request for Special Exception for Height, dated February 28, 2018, submitted separately.

Moreover, maintaining a compact footprint for the new buildings supports retaining the open space areas for athletic and recreational uses for students and the community, important policies under the City's Comprehensive Plan. A compact footprint further maintains available parking necessary to accommodate student and staff needs which eliminates on-street parking. A sprawling new one or two story building not only would eliminate athletic and recreational opportunities for students and the community, sprawling buildings waste resources as they are not energy efficient and create congestion and circulation inefficiencies. In addition, the design of the High School project provided the opportunity to locate an emergency drive aisle between the Three-Story Academic Wing and the Stadium (connecting to Main Street and to Washington Street) to enhance emergency service capability for the High School and for events in the Stadium.

2. Elhi Hill Educational Program.

The other component of the Project is to provide for a change of use of the former Multi-Care Medical Clinic (and adjoining parcels) to provide for a phased interior improvement¹² to the former Multi-Care Medical Building to create classroom space to house the Elhi Hill Program and to create immediately new parking on the adjoining parcels. Minor changes or cosmetic refreshing may be made to the exterior of the building. No changes to the existing parking lot or landscaping are proposed. The Elhi Hill project will demolish the two houses on the adjoining parcels located at 914 Meeker Avenue and 908 Meeker Avenue to construct a new parking lot (see Parking Plan Map). Parking at the Elhi Hill Program will add an additional 44 parking stalls for a total of 688 parking stalls associated with the overall High School Project. A six (6) foot sight obscuring wood fence will be installed around the southerly and westerly boundaries of the new Elhi Hill parking lot and a mix of landscaping consisting of maples, hogan cedars, shrubs and grasses will be planted to screen the adjacent residential parcels. The existing parking lot is bounded by a thick hedge of thuja arborvitaes (cypress cedars) which provides a very effective obscuring buffer.

The Elhi Hill Program provides the opportunity for students who desire or need additional support of an alternative educational program to be part of and connected to all of the academic resources provided by a more traditional high school curriculum. In addition, the location will provide a community of additional counselling staff available to assist, as necessary, the Elhi Hill students. Finally, school bus transportation services will be conveniently available to the Elhi Hill students as well. The ability to house the Elhi Hill Program adjacent to Sumner High School serves not only the students but the taxpayers of the District with the available efficiency and sharing of resources.

¹²The tenant improvements will be permitted by separate building permit application.

III. CUP CRITERIA

The Project, as set forth below, satisfies the review criteria for approval of a CUP under SMC 18.48.050.

- A. **The proposed use will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity of the proposed use or in the district in which the subject property is situated.**

As described above, the proposed modernization and addition to the existing Campus of Sumner High School are all located on land that is designated under the City's Comprehensive Plan - Land Use Map for use as "Public-Private Utilities and Facilities" and within an underlying LDR-12 zoning classification with the acknowledgement in Low Density Residential Districts that school uses are treated as a "secondary allowed use". Similarly, in a Medium Density Residential District, school uses are treated under the City's Comprehensive Plan as a "secondary allowed use". Within the Central Business District Zone, public facilities are similarly treated as a recognized compatible use which may be subject to conditions as appropriate under the circumstance. Therefore, the proposed modernization and addition to the existing Campus of Sumner High School and the use of the existing building of the former medical building and adjoining properties are necessarily contemplated in the Zoning Districts in which the properties are located.

Specifically, neither the modernization or addition to the existing High School Campus or the use of a former medical clinic to be renovated in the interior together with the adjoining parcels for proposed parking will be materially detrimental to the general public welfare, property or improvements in the vicinity. The School District, through its consultants with expertise in the areas for potential impacts, has thoroughly and carefully reviewed the proposed Project in relationship to the surrounding area.

Architecture, Materials, and Footprint Compatible with Area

The modernization and addition of the existing High School Campus proposes to add capacity for a very small increase for additional students – only 33 students beyond the current student population of 1797 students (OSPI Report, June 2017). The modernization and addition of classroom spaces has been designed principally to relocate students who have been housed for many years in interim portable classrooms to permanent space in order to eliminate the use of portable classrooms at Sumner High School and to modernize the existing High School to provide functional and flexible instructional areas. Maximizing the existing Campus site to maintain the look and feel of the existing Campus with a small building footprint to land (approximately 26.8 acres) ratio¹³ preserves open space areas used by the students and the community for recreational

¹³26.8 acres represents the existing Campus and the addition of the two parcels on Wood Avenue for parking.

and athletic events and increases on-site parking available to students and staff consistent with City requirements, thereby minimizing the use of street parking.

The existing Campus has a long history in the central core of Sumner with a compact school footprint comprised of buildings offering an exceptional educational program to its students with a buffer of green space. The modernization of the existing Campus with the addition of a Library as part of a second story Commons Area and a Three Story Academic Wing will preserve this legacy with the compatibility of the heights of the existing buildings on the Campus ranging from the fly loft flat roof of the PAC at 56', the Sunset Stadium (home) bleachers raise to about 41', and the existing gymnasium and two-story classroom wing at a height of 38' and 35', respectively. Moreover, the architectural features and exterior materials, as described, coupled with the substantial setbacks of the structures provide compatibility with the residential areas (north and south) and modulate the presence of the buildings to minimize bulk. In addition, the modernized High School buildings are near and adjacent to the City's East Main area which is proposed to be planned for 55' height limits as part of updated comprehensive planning under the City's Comprehensive Plan.

Landscaping

The landscaping around the new Wood Avenue Parking Lot and the new Elhi Hill Parking will incorporate a mix of maples, Hogan cedars, native shrubs and grasses to complement and buffer adjacent residential parcels. In addition, there will be a 6' solid wood fence along the southerly and westerly boundaries of the new Elhi Hill Parking Lot to further screen the abutting residential properties.¹⁴ New frontage landscaping along the main entrance of the High School will feature street friendly landscaping to provide an inviting and attractive entrance to complement the new Front Entry Plaza area and Main Street. Similarly, new landscaping within the plaza area leading to the PAC will be installed and along the easterly border of the Three Story Academic Wing.

Exterior Lighting

As described in the Lighting Report¹⁵ prepared by BCE Engineers, all of the new exterior lighting, both pole mounted and wall mounted, will be provided with LED full cut-off fixtures which more precisely controls the distribution of light in order to illuminate only the areas intended to be lit. The existing pole mounted lighting in the North and West Parking Lots have been previously retrofitted with LED full cut-off fixtures to control the distribution of light. In addition, to further minimize illumination, all lighting (both new and retrofitted) will be (and is) equipped with motion sensors to allow the diming of the light to at least 50% if motion is not detected. The

¹⁴See Landscape Plans, dated February 19, 2018, prepared by Weisman Design Group.

¹⁵See Lighting Design Report, dated February 23, 2018, prepared by BCE Engineers, Inc.

height of the poles vary¹⁶ in each of the Parking Lots (depending upon the available location within a parking lot to site the poles and the resultant distribution of light) to ensure the areas are adequately illuminated for safety and security of students and staff. Along the walkways and circulation areas, including the new walkway from the Wood Avenue Parking Lot to the High School, the Front Entry Plaza area, and the Tennis Court Plaza area will have smaller pedestrian scale fixtures on 12' poles. Surface mounted lighting also will be used in appropriate areas - the PAC canopy, seating in the Front Entry Plaza, and on the face of the wall surrounding the chiller to direct light onto the ground. Exterior lighting existing at the former Multi-Care Clinic (1518 Main Street) will remain.

Thus, as evidenced by the Photometric Plans attached to the Lighting Report, all of the lighting in conjunction with the modernization of the High School and the new lighting for the Elhi Hill Parking Lot will create no detrimental adverse impacts to any abutting property or in the right-of-way. Further, the School District will operate all exterior lighting under a new lighting control system in accordance with the School District's following Standard Operating Procedure:

- 1) All exterior lights shall be off during daylight hours.
- 2) In the morning, exterior lights shall turn on no earlier than 15 minutes before the first employee arrives (except for the school bus loading/unloading area on Mason Street).
- 3) The exterior lights on School District property facing Mason Street in the school bus loading/unloading area shall only be on from 7:00 a.m. to 7:45 a.m. during the winter months when sunrise occurs after 7:00 a.m.
- 4) In the evening, exterior lights shall turn off no later than 15 minutes after the building is secured for the evening (typically around 11:15 pm).
- 5) On weekends, exterior lighting shall be allowed for School District authorized facility events only. Otherwise exterior lights shall remain off.
- 6) All exterior lights shall be equipped with motion sensors in order to dim lighting to approximately 50% intensity when no motion is detected.

Noise Evaluation

Ramboll US Corporation conducted a noise evaluation of the existing chiller, a new emergency generator, and location of the school buses loading and unloading on-site to ensure there were no adverse noise impacts from these proposed on-site uses to the neighboring

¹⁶ The Wood Avenue, Front Entry, and Elhi Hill Parking Lots will have lighting mounted at 25'. Similarly, the two poles on District property facing Mason Street in conjunction with the school bus and unloading area will be mounted at 25'. The existing poles on the West and North Parking Lots are 30'.

residential area.¹⁷ The study concluded that with the noise attenuation measures proposed for the mechanical area housing the chiller consisting of a 12' wall along the west, east, and south sides of the enclosure, a 14' wall along the north side of the mechanical area with absorbent attenuation material applied to the interior face of the north wall, and a replacement of the existing chain link gate in the western wall with a solid gate to the 12' height would provide sufficient attenuation to achieve compliance with Sumner's noise standards in the daytime hours (varying between 7 to 11 dBA below the noise limits) when running the full cooling system, and in the night time hours before 7:00 a.m. (substantially below noise limits) when running only the dry cooler.¹⁸ An emergency generator will be installed westerly of the mechanical area which would only be used during a power outage but would be tested once a month. Noise modeling of the testing of the generator assumed that the full cooling system was engaged and that the generator would be tested during the quietest part of the daytime (9:00 am to 10:00 am). This modeling scenario established that City noise limits during the daytime hour testing of the generator (once a month) would be satisfied (varying from 6 dBA to 11 dBA). Moreover, the testing of the generator (once a month) while the full cooling system was operating would result in an increase in noise that would create a minimal potential for noise impacts.

The Noise Study further modeled the location of the school buses travelling along the westerly portion of the North Parking Lot and determined that with the proposed 6' foot solid fence along the most westerly property line, the City noise limits would be satisfied. In addition, noise from both on-site and off-site buses would result in noise increase of between 1 and 3dBA at the nearest properties which would "barely be noticeable".¹⁹

Traffic

As demonstrated by the Transportation Technical Report ("TTR") prepared by Heffron Transportation ("Heffron"), there are no significant adverse transportation impacts related to or arising from the modernization of the existing High School Campus or the adjoining Elhi Hill Program. Heffron conducted a transportation evaluation by analyzing 20 intersections, inclusive of all 11 access driveways of the entire existing High School Campus, and the proposed driveway accesses for the Elhi Hill Program, school bus routes, and anticipated trip distribution patterns based upon the re-configured and new parking lots to serve the Project. This study was conducted for three periods (school arrival peak hour, school departure peak hour, and the commuter p.m. peak hour) without the Project and with the Project based upon a reasonable background traffic growth.²⁰

The TTR shows that the net increase of trips generated from the increased student capacity proposed with the Project over the existing student population is small. All of the study area

¹⁷See Sumner High School Modernization Noise Study, dated March 2, 2018, prepared by Ramboll US Corporation.

¹⁸ See p. 8 of Noise Study, dated March 2, 2018, prepared by Ramboll.

¹⁹ See p. 9 of Noise Study, dated March 2, 2018, prepared by Ramboll.

²⁰See pp. 1-2 of TTR, dated February 22, 2018, prepared by Heffron Transportation.

intersections would operate at the same levels of service overall as they would operate without the Project. All study intersections would operate at LOS C or better overall with unsignalized intersections continuing to operate at existing LOS D or better during the analyzed three peak hours (school AM and PM and commuter PM peak hours) consistent with the City Comprehensive Plan transportation operational standards.²¹ Although there would be some change in traffic patterns with student driver and automobile loading and unloading with the opening of new parking lots, the full use of the North Parking Lot upon completion of the Project and removal of the interim portables, and the re-location of the school bus loading and unloading, the temporary busy conditions in the school arrival or departure peak would exist without or with the modernization. There would only be very minimal increase in delay at some of the study intersections and turning movements during the morning and afternoon school peak hours²². Moreover and significantly, in evaluating potential impacts from the Project, the TTR assumes no credit [reduction in trip generation from the existing condition] for the decrease in traffic associated with both removing the swimming pool, historically a well-used community use on the High School Campus, and the change of use of the Multi-Care Clinic with a higher volume of traffic associated with medical clinics [ITE Manual] than school high use. Both of these actions would result in net decreases in traffic generation compared to the historical prior uses; however, credits for the removal of those uses and their associated traffic were not included in the traffic study. Therefore, the conclusions presented by Heffron in the TTR are conservatively high estimates of Project-related traffic operations which clearly demonstrates that there are no significant, adverse transportation impacts.

Heffron Transportation further conducted a ground study of student and staff parking to determine an actual rate of school-related parking demand in order to evaluate the adequacy of the additional 224 on-site parking stalls to be constructed with the Project. This parking demand study determined that the 224 additional parking stalls proposed with the Project would represent nearly a 50% increase in off-street parking (on-site) parking supply available with the Project for school-related demand based upon the actual rate of school parking demand per student/staff. Therefore, the Project is anticipated to substantially reduce or eliminate demand for on-street parking by students or staff. The proposed increase in parking stalls would likely provide an excess supply of nearly 15% compared to the peak school-demand determined by the parking demand study conducted by Heffron²³.

Thus, the School District has planned and designed the modernization of the existing Campus of Sumner High School with the adjoining Elhi Hill Program with consistency of the existing building heights and architectural features to enhance the area and to ensure there are no material detrimental impacts to the neighboring areas. The School District has incorporated

²¹ The *City of Sumner Comprehensive Plan 2015* defines the LOS standard for arterials and collectors as LOS D, except for the Valley Avenue / Main Street intersection, where LOS F operation is allowed.

²² See pp. 32, 37 of TTR, dated February 22, 2018, prepared by Heffron Transportation.

²³ See pp. 18, 35, 27 of TTR, dated February 22, 2018, prepared by Heffron Transportation.

appropriate measures as part of the Project, as described above, including strategically designed improvements to preserve existing open space for student and community recreational uses and to maximize available on-site parking, to provide screening buffers, plantings, selective and directional lighting, appropriate noise attenuation measures, and operating procedures to provide compatibility with the surrounding community and continue its legacy of being a central tenet of the core of the City of Sumner.

B. The proposed use shall meet or exceed the performance standards that are required in the district it will occupy.

The Project meets and exceeds performance standards as set forth under the LDR-12, MHR, CBD, and LDR-6 zoning classifications.

The revisions to the existing stormwater system, as required in conjunction with certain modernization elements of the Project, will be designed to meet current City regulations consistent with the Best Management Practices of the Department of Ecology Stormwater 2012 Manual, as amended by 2014 amendments. The existing chiller and associated infrastructure (located west of the new PAC entry) will remain in its existing location (*see* Exterior Views, Sheet A3.01), however, attenuation measures will be enhanced in order to ensure compliance with the City's Noise standards under SMC 8.14 as established by the Noise Study conducted by Ramboll. In addition, an existing chain link fence along the westerly boundary of the North Parking Lot is proposed to be replaced with a solid 6' fence²⁴ to ensure that school bus traffic along the westerly area of the North Parking Lot meets the City noise standards. Moreover, any noise increase associated re-locating the school busses to Mason Street along the frontage of the District owned property and the special education buses to the easterly portion of the West Parking Lot to all exit onto Mason for travel onto Washington "will barely be noticeable" as established by the noise evaluation conducted by Ramboll.

The Project will also provide enhanced screening in the nature of landscaping and a solid 6' board fencing along the common residential boundaries (south and west) as part of the new Elhi Hill Parking Lot. The Landscaping Plans show also interior landscaping areas to enhance circulation and walkway areas. All landscaping will meet or exceed City Code requirements. In addition, the Project, as discussed above, significantly increases on-site parking (244 total parking stalls) to provide adequate student and staff parking. As documented by the Transportation Technical Report, based upon Heffron's parking demand study at the existing High School Campus, the additional parking stalls provided with the Project would represent about a 50% increase in off-street (on-site) parking supply for school-related demand and would substantially decrease or eliminate overall school-related on-street parking. The proposed increase in parking

²⁴ The School District has been in communication with the City regarding this strip of land where the school busses will traverse and which has been used as a drive aisle by the District as previously conveyed by the District to the City as required by the 1992 High School CUP approval.

supply planned with the Project would provide excess supply of nearly 15% compared to the estimated peak school-day demand which would better accommodate daily and seasonal fluctuations in demand.

As described above, the Project is intended to primarily relocate students from existing interim portable classrooms and other temporary facilities (Elhi Hill). Given that there is minimal increase in student capacity provided by the Project (33 students and no staff increase) from the existing student population of 1797, the increase in parking stalls also is consistent with the City Code requirements under SMC 18.42.040H based upon an assumed increase of 395 students and 50 staff as calculated by the baseline capacity of the existing permanent building space of the existing High School as documented by the School District's Capital Facilities Plan. Therefore, 244 parking stalls exceeds the 208 parking stalls required under the City Code (assuming there was a substantial increase in student capacity by the Project) with a cushion of about 15%. Importantly, as discussed above, the parking demand study conducted by Heffron establishes that actual demand is anticipated to be more than be satisfied on-site with the Project.

C. The proposed development shall be compatible generally with the surrounding land uses in terms of traffic and pedestrian circulation, building and site design.

The Project will be compatible with the surrounding land use in terms of traffic and circulation and building and site design.

Although there will be changes to traffic patterns from student drivers and family automobiles with the construction of the new Wood Avenue and Elhi Hill Parking Lots, the additional available parking stalls at the North Parking Lot upon removal of all of the portable classrooms at completion of the Project, and the parent loading and unloading area proposed at the Main Entrance to the High School along Main Street, all existing 11 access driveways to the existing High School will remain unchanged and adequate. The relocation of the school bus loading and unloading from the Main Street access to Mason Street [along the frontage of School-District owned property] and the special education buses to the easterly drive aisle of the West Parking Lot will relieve the existing busy condition on Main Street associated with school bus arrivals and departures. The significant increase in on-site parking and re-location of the school bus loading and unloading areas will improve transportation circulation surrounding the High School campus.

As the TTR performed by Heffron demonstrates, the Project will create no impact to the level of service operations at any of the study intersections in the surrounding area, including the driveway accesses. All intersections would operate at LOS C or better overall and all movements at unsignalized intersections would continue to operate at LOS D or better during all analysis periods (school AM, school afternoon PM, and commuter PM peak). The Project would further

only add very minimal delay at any of the study intersections. The TTR establishes that the Project is compatible with the surrounding area and does not create any significant, adverse impacts.

The School District has thoughtfully and consciously designed the modernization and addition to the existing High School Campus to preserve continuity of design and compatibility with the surrounding area to south of Main Street and north along Mason and Washington Streets. The exterior finish of the modernized building and new additions will be compatible with the surrounding area by use of materials consistent with a Northwest architectural style, including wood-grain cement board, brick masonry, and metal siding. The use of gable roof lines on the new additions, a common feature, in the surrounding residential area will provide compatibility and harmony with the residential areas to the south and the north. The materials of the addition will provide visual and aesthetic continuity with the existing High School building for a cohesive appearance.

Moreover, 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 (on land formerly known as the Brinks property). 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) 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'.

Therefore, 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. Moreover, the modernization and addition of the High School campus will create a material benefit to the

surrounding area by preserving open space for recreational and athletic use for students and the community on the Main Campus through compact development.

Further, as the Noise Study establishes, the District has incorporated into the Project appropriate measures to ensure compliance with the City's Noise standards for the mechanical yard and the generator. Moreover, the relocation of the school buses to Mason, traveling to Washington will create an increase in noise level that is "barely notice" with the existing background noise.

D. The proposed use shall be in keeping with the goals and policies of the Sumner Comprehensive Plan.

The Project is consistent with and serves the City's Comprehensive Plan goals and policies in numerous respects.

The existing Campus High School is designated under the City's Comprehensive Land Use Map as "Public-Private Utilities and Facilities." As described under the City's Comprehensive Plan, the primary purpose of this land use designation is to identify lands appropriate for the provision of public and private utilities, facilities and services. Allowable uses include parks, schools, medical facilities, non-profit service uses/organizations, public and private utilities, and government buildings. The Land Use Sub-Element contemplates that the designations under the "Comprehensive Plan Land Use Map" will be implemented through the Zoning Classification for the reason that they are treated as compatible uses.

Land Use Sub-Element

Policy 1.6 Implement the land use map and accompanying designation descriptions as presented in the section titled "Land Use Designations" and Figure 3 titled "Comprehensive Plan Land Use Map" through the adoption and maintenance of the Zoning Map.

Therefore, consistent with this Policy, the City's Comprehensive Plan describes both the "Low Density" residential and the "Medium Density" residential designations²⁵ as allowing not only the "primary use" of single-family residential dwellings but also "[s]econdary allowed uses" which include ". . . public and private educational facilities . . .". Similarly, the Wood Avenue Parking Lot parcels are designated under a "Medium Density" Residential (the Wood Avenue Parking Lot) classification which identifies the purpose of this zoning classification to "facilitat[e] the provision of . . . public services" and therefore designates "public and private educational

²⁵See pp. 40 and 43 of the *City's Comprehensive Plan* language under the Land Use Designation chapter. As stated above, the School District parcel at 908 Meeker Avenue (future Elhi Hill Parking Lot) is classified as a Low Density Residential classification (LDR-6).

institutions” as a “conditionally permitted” use (SMC 18.14.040)²⁶. The Central Business District (CBD) also treats “schools” as “conditionally permitted” uses (SMC 18.12.020(47))²⁷

The identification under the City Municipal Code of “public educational institutions” or “facilities” or “schools” as either “secondary allowed uses” or “conditionally permitted” uses under the various Zoning Classifications as well as the Comprehensive Plan Land Use Designation as a “Public Facilities” recognizes, by definition, that “schools” are necessarily compatible (although subject to reasonable conditions) in each of these Zones.

This clear intent of the Code, in turn, harmonizes with several Goals, Policies, and Objectives under the City’s Comprehensive Plan which recognize the important function and benefits provided by educational facilities to the surrounding area and the Community as a whole. “Education” is expressly identified as a specific “Value” to be supported and encouraged. At page 22 of the Comprehensive Plan, 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.
(Emphasis added.)

The “Value” of education is also expressed under the Capital Facilities and Public Services Element of the Comprehensive Plan which recognizes that public facilities must be provided in a manner which is effective and efficient.

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.*

Policy 1.10: *Support the Sumner . . . School District in providing the best education for all students in the District. (Emphasis Added).*

These objectives are supported by permitting the modernization and addition of the existing Sumner High School campus to provide adequate facilities for its students (in lieu of interim, portable classrooms) at the existing High School Campus to allow the tradition of an extraordinary education at Sumner High School to continue with: (i) classrooms supporting technology upgrades, (ii) enhanced science, music, and art instruction, (iii) multi-function and flexible classroom space to allow interdisciplinary study, team building, collaborative interaction,

²⁶The Mason Street parcels proposed to be used for Construction Staging (as described more particularly below under Criteria E) are also designated under MDR zoning classification.

²⁷ Two of the Elhi Hill Program parcels (1518 Main Street and 914 Meeker Avenue) are designated under the CBD Zone Classification.

and other innovative instructional methods as education moves beyond memorization and recitation of information, (iv) an improved Library with technology upgrades as the second story of the Commons – at the center of the High School which establishes a focal point of the High School for academics and relationship building of a diverse student body. These objectives are further supported by permitting the use of the former Multi-Care site (and adjoining parcels) to establish a connection and integration of the entire high school student body, provide increased educational and recreational opportunities for the students attending the Elhi Hill Program, to provide efficiency in resources where deliveries can be combined, opportunities for carpooling are increased, and convenience of use of the school bus system is supported.

The modernization of the existing High School Campus and use of the former Multi-Care site and adjoining parcels, as discussed above²⁸, are also consistent with the following Comprehensive Plan policies:

Environment Element

Policy 1.4 *Protect surface water quality and quantity from significant degradation as required by state and federal law.*

Policy 1.4.4 *Maintain consistency with local, regional and federal water quality protection plans and permits.*

Policy 1.6 *Encourage the efficient use of energy as a means of practicing environmental stewardship.*

Policy 1.9 *Encourage energy conservation and efficiency in building material and site design.*

Policy 3.5 *Work with other agencies and the Sumner School District to promote environmental education.*

Transportation Element

Policy 3.1 *The LOS standard for arterials and collectors in the City of Sumner shall be LOS D or better except . . . [certain intersections are allowed LOS F].*

Utilities Element

Goal 4. *Ensure environmentally sensitive, safe and reliable service, and conservation of energy.*

Policy 4.5 *Support the planting of trees along street edges and parking lots and large expanses of asphalt to create a pleasing environment and to increase energy efficiency by reducing heat absorbed by asphalt that increases ambient temperatures.*

²⁸Also see Expanded SEPA Checklist. The modernization of the High School is designed consistent with the Washington Sustainable Schools Protocol.

In addition, the Comprehensive Plan further recognizes under the Community Character Element (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).

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.*

Finally, the modernization and addition project to the existing Campus of Sumner High School are consistent with the City’s goal in the core of the City (consistent with the GMA) of compact development which in turn preserves the City’s goal of providing adequate open space for recreational opportunities for the community (an element also accomplished by the High School modernization)²⁹:

Community Character Element

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)³⁰

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.*

²⁹The 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).

³⁰*Also 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.

Thus, the modernization of the existing Sumner High School Campus and the siting of the Elhi Hill Program on adjacent property clearly implements and is supported by the City's Comprehensive Plan.

E. All measures have been taken to minimize the possible adverse impacts which the proposed use may have on the area in which it is located.

As described above, the School District has thoughtfully and carefully reviewed, with the assistance of consultants with expertise, all reasonably likely potential impacts of the Project. Based upon this review, the School District has mitigated, as described above, through appropriate measures imposed upon and integrated into the Project and as adopted by the School District as an Operating Procedure, any such potential adverse impacts arising from the Project and its operation.

In addition, the School District is mindful of and has considered potential impacts during the construction phase of the Project. Therefore, the School District will impose a contractual obligation on the contractor to implement a Construction Management Plan (the "CMP") consistent with the measures set forth below. The CMP is intended to serve three objectives:

- (i) maintaining school operations in a safe and secure manner,
- (ii) timely accomplishing the construction with efficiencies and safety, and
- (iii) minimizing impacts to the surrounding area.

Attached hereto is a Construction Staging Plan showing assigned construction staging areas and the temporary placement of 16 additional portables, office space, and a comfort station for school operations in the North Parking Lot as students and staff are moved in and out during phases of demolition and re-building³¹.

The CMP shall include the following elements:

- Except as may be otherwise be granted by the City upon request of the School District based upon special circumstances, the hours of construction shall comply with City Code (SMC 15.34.010).
- The hours of construction shall be posted on the School District property (both Sumner High School and Elhi Hill Program) in a visible location for the duration of the construction activities (SMC 15.34.010).
- Construction material and equipment staging ("Construction Staging Areas") shall occur on the School District parcels identified in the Construction Management Plan (1111 and 1101 Wood Avenue; 1424, 1428, and 1506

³¹The additional temporary facilities are subject to a separate authorization process arising from the temporary nature of the facilities.

Mason Street; and (portion) North Parking Lot, and such other locations within the existing High School campus as necessary for construction purposes.

- All Construction Staging Areas shall be fenced and secured with gates and locks.
- The West Parking Lot and the existing portion of the Wood Avenue Parking Lot shall remain open and available for parking.
- The contractor shall develop a plan to address traffic and pedestrian control, as may be necessary to the construction activity and as appropriate to the phase of construction, which shall include the components of truck and equipment routing, lane and walkway closures as applicable, and loading and unloading areas as necessary.
- To the extent possible, all vehicles, trucks, and equipment shall be turned off when not in use.
- To the extent possible, construction trucks, generally to and from the City, shall comply with the City's Truck Route as designated under SMC ch. 12.30.
- All local construction truck deliveries to the School District Property shall follow the shortest route reasonably possible consistent with SMC ch. 12. 30.
- Truck movements (deliveries and earthwork transport), to the extent reasonably possible, shall not occur during morning arrival and afternoon dismissal of the High School.
- Construction traffic shall be separated from school bus loading and unloading.
- Wheel wash stations shall be installed at appropriate access locations.
- City streets shall be swept or cleaned as may be necessary.
- Appropriate areas shall be identified for construction staff parking.
- Construction phasing shall include converting the area of the Wood Avenue Parking Lot into a surface parking lot in an early phase of construction.
- The Elhi Hill Parking Lot shall be prepared for a surface parking lot in an early phase of the construction.
- The School District and the contractor shall meet with the City to review the CMP prior to the commencement of construction.

IV. CONCLUSION

Sumner High School has long been established since the early 1900s 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 and the proposed integration of the Elhi Hill Educational Program (1518 Main Street) as part of the High School Campus continues the legacy of providing extraordinary education, necessary resources, and preparedness for life for the next generation.

Ryan Windish
Application for Conditional Use Permit
Sumner High School Modernization
March 2, 2018
Page 22

The Project implements the central values and policies of Sumner's Comprehensive Plan of providing "efficient and quality capital facilities and public services at the level necessary to support" the Community through compact development to preserve the strong tradition of providing open space for recreational use for the School District's students and community.

As fully shown above, the School District has analyzed all potential impacts from the Project. That thorough analysis establishes that there are no material detrimental impacts to the surrounding area and that the proposed Project is consistent with numerous policies of Sumner's Comprehensive Plan. This consistency with the City's Comprehensive Plan establishes that the Project, as defined under the City Code, is an "allowed use" beneficial to the Community.

Thus, the criteria under SMC 18.48.050 has been satisfied to provide a recommendation of approval of the Conditional Use Permit application.

We are prepared to respond to any questions during City Staff's review of this Application. Please do not hesitate to contact us.

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)