



City of Puyallup

**Planning Division**

333 S. Meridian, Puyallup, WA 98371

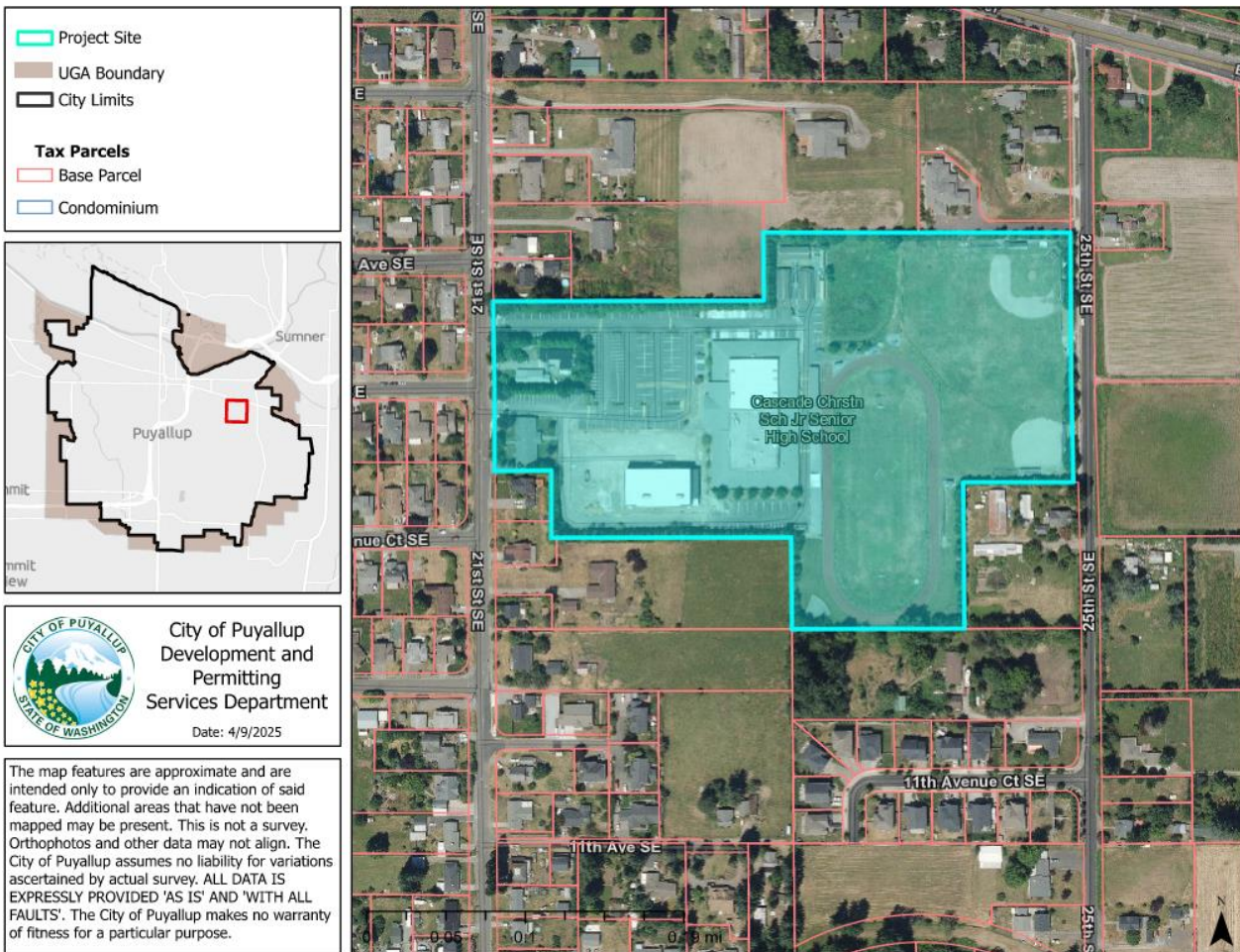
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**STAFF REPORT TO HEARING EXAMINER**

To: Hearing Examiner  
From: Nabila Comstock, Associate Planner  
RE: Cascade Christian School - Elementary Project # PLCUP20240037  
Date of memo: April 28, 2025 – Updated conditions per Hearing Examiner’s request  
Hearing Date: April 21, 2025

**VICINITY MAP**



**PROJECT OVERVIEW**

<p><b>Applicant:</b> Songyi Cho - Jeff Brown Architecture, LLC</p> <p><b>Staff Coordinator:</b> Nabila Comstock, Associate Planner</p> <p><b>Property Owner:</b> Cascade Christian Schools</p> <p><b>Address:</b> 811 21st St SE, Puyallup, WA 98372</p> <p><b>Parcel ID#:</b> 0420352159</p> <p><b>Site Size:</b> 769,705.20</p> <p><b>Comp Plan Designation:</b> LDR - low density residential</p> <p><b>Zoning:</b> RS-04 - High urban density single-family residential zone, RS-08 Medium urban density single-family residential zone. In the RS single-family zones, private and public education facilities are a conditionally permitted use.</p>	<p><b>Proposal:</b> Cascade Christian Schools is applying for a conditional use permit to add eleven (11) new double portables to accommodate the addition of the elementary school operations to the campus at 811 21st St SE. The proposed portables include general classrooms, one library, one computer lab, two restrooms, one band room, and one administrative office. Project includes associated landscaping and frontage improvements.</p> <p><b>Relevant History:</b> Cascade Christian Schools (CCS) at 811 21<sup>st</sup> St SE was approved via a conditional use permit in 1995 and received another CUP in 2008 for the use of the site as a junior and high school. In 2023, the elementary school operations located at a different site were terminated for the 2024-2025 school year. CCS then moved their elementary school students onsite to 811 21<sup>st</sup> St SE to allow for them to continue offering elementary school operations.</p> <p><b>Summary of Key Issues:</b> Prior to the application for the conditional use permit, the school moved elementary school operations onsite without prior approval. This has resulted in traffic impacts to the surrounding neighborhood.</p> <p><b>Staff Recommendation:</b> Approve with conditions</p>
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**PUBLIC NOTIFICATION RECORD – APPLICATION NOTICE**

- Permit request received by city on June 12, 2024
- Initial submittal deemed complete by Department on June 12, 2024
- Notice of complete land use application mailed to all owners of property within a specified radius of the site (as required by PMC 20.12.010) as indicated by the Pierce County Assessor Treasurer’s records: May 10, 2024
- Notice of Application sent to the current list of public agencies and Tribes noticed of complete land use applications by the Department: May 10, 2024
- Notice of Application Published in the Tacoma Weekly: May 8-14, 2024, edition
- Notice of Application was posted at the project site by the applicant: May 10, 2024 (verification provided by the applicant via affidavit of posting).

**PUBLIC NOTIFICATION RECORD – HEARING NOTICE**

- Notice of Public Hearing mailed to all owners of property within a specified radius of the site as indicated by the Pierce County Assessor Treasurer’s records: 24 days in advance of hearing – 15 days minimum required by PMC 20.12.010 (1)).

- Notice of Public Hearing was posted at the project site by the applicant: Songyi Cho (verification provided by application via affidavit of posting 20 days in advance of public hearing, 15 days minimum required by PMC 20.12.010 (3)).
- Notice of Public Hearing published in the Tacoma Weekly: 19 days in advance of hearing – 15 days minimum required by PMC 20.12.010(1)).

## **COMMENT RECORD**

### Neighborhood Comment:

Several neighbors have provided comments and concerns at the neighborhood vicinity meeting held on February 22, 2024, and in response to the notices of application, and the notice of hearing required to be issued as a part of this project. These comments and concerns include:

1. Concerns regarding the existing traffic on 21<sup>st</sup> St SE out to East Pioneer and side streets when there is school traffic present in the morning and afternoon, parking on neighborhood streets, pedestrian safety, vehicle noise, and speeding.
  - The city will enforce all parking and traffic laws if they are reported. It is illegal to block driveways or to park in narrow alleyways.
  - The traffic concerns shared amongst neighboring property owners are intended to be addressed by the conditional use permit traffic conditions. Conditions include, but are not limited to, requiring onsite traffic mitigation countermeasures such as CCS staff assisting motorists on-site to improve efficiency, optimizing on-site routing for pick-up and drop-off locations, and staggering start and end times of secondary and elementary school.
  - The full list of traffic conditions can be found in the final DRT letter and at the end of this staff report.

### Agency Comment:

2. A response from the Department of Ecology was received in response to the Notice of Application. Their comment stated all grading and filling of land must utilize only clean fill and that if contamination is suspected, discovered, or occurs during demolition or construction, then testing must be conducted. If contamination is readily apparent, the applicant must notify the Department of Ecology.
3. A response from Nisqually Indian Tribe was received in response to the Notice of Application. Their comment stated that they had no specific comments or concerns, but to keep them informed if there are any Inadvertent Discoveries of Archaeological Resources/Human Burials.
4. A response from the Squaxin Island Tribe Cultural Resources Department was received in response to the Notice of Application. their comment stated that though the project is within their treaty and traditional area, they recommend consulting with the Puyallup Tribe regarding cultural resource concerns.

## **STATUS OF REGULATIONS**

Since the filing of the complete application, no amendments to regulations applicable to the project have been adopted by the City Council.

## **STATE ENVIRONMENTAL POLICY ACT (SEPA) STATUS**

A SEPA Determination of Non-Significance (DNS) was issued on April 2, 2025. The appeal period for the SEPA DNS ended on April 14, 2025. No appeals were made to the issuance of the SEPA DNS. Therefore, the SEPA DNS is considered final.

## **PROJECT DETAILS**

Cascade Christian Schools is proposing to add eleven (11) new double portables to accommodate the addition of the elementary school operations to the campus at 811 21st St SE. The proposed portables include general classrooms, one library, one computer lab, two restrooms, one band room, and one administrative office.

Other features include:

### **Parking Improvements**

- The CCS site provides 390 parking stalls, which exceeds the required minimum parking of 272 stalls.
  - 216 regular parking stalls
  - 174 compact stalls
  - Includes 9 ADA van stalls

### **Accessibility**

- Compliance with ADA internal sidewalks and pedestrian pathways are required and proposed.

### **Fire Safety**

- To accommodate fire access concurrent with the utilization of the internal site circulation to mitigate student drop-off/pick-up queues, an additional lane width is provided in aisles adjacent to the junior and high school drop-off/pick-up area. This area allows for queuing vehicles to yield and pull over to allow for fire access if required.

### **Landscaping**

- A landscape buffer in compliance with current City of Puyallup code requirements is provided between the proposed portables and 21<sup>st</sup> St SE.

## **SURROUNDING AREA**

Surrounding land uses adjacent to the subject property include existing single-family homes to the north, west, east, and south. Other land uses include an undeveloped parcel to the east as well as a commercial development, Northwest Christian School and Shaw Road Elementary School.

## **CRITICAL AREA REVIEW**

A portion of the project site is within the 100-year floodplain. However, the proposed project area is not within the mapped flood plain nor within 300-feet of a stream or river. Therefore, a habitat assessment was not required.

The site is within the volcanic hazard area and aquifer recharge area. The proposed project does not introduce significant risks to these sensitive areas due to the nature and scale of the proposed project.

## **STAFF CONCLUSIONS**

Required findings to grant a conditional use permit per PMC 20.80.010:

- I. That the use for which the conditional use permit is applied for is specified by this title as being conditionally permitted within and is consistent with the description and purpose of the zone district in which the property is located.

Staff Analysis:

- a. The site is located in the RS-04 – high urban density single-family residential zone and the corresponding LDR – low density residential land use designation. The intent of this zone is primarily for single family uses. However, the zone allows for private school facilities as a conditional use, subject to certain criteria.
  - b. The proposed additional eleven (11) portables are intended to appropriately accommodate the existing number of students onsite. The project, as conditioned, will remain consistent with the description and purpose of the zone district.
2. That the granting of such conditional use permit will not be detrimental to the public health, safety, comfort, convenience, and general welfare, will not adversely affect the established character of the surrounding neighborhood, and will not be injurious to the property or improvements in such vicinity and/or zone in which the property is located.

Staff Analysis:

- a. The eleven (11) portables are proposed to address the existing non-conforming student enrollment at Cascade Christian. Though the addition of the portables does increase the maximum capacity of students to 1,341 students based on occupant load calculations, staff has included conditions of approval to cap the enrollment of students at 1,065 students before an alternate access and queuing area from 25<sup>th</sup> St SE or equivalent capacity improvement will be required along with an associated traffic impact analysis. Full conditions of approval for student capacity and enrollment are included in the conditions at the end of this staff report.
  - b. The addition of the portables should not be detrimental to the surrounding neighborhood under the required conditions to minimize impacts on the surrounding residential neighborhood through proposed landscaping buffers and conditioned traffic mitigation.
3. That the proposed use is properly located in relation to the other land uses and to transportation and service facilities in the vicinity; and, further, that the use can be adequately served by such public facilities and street capacities without placing an undue burden on such facilities and streets.

Staff Analysis:

- a. The addition of the eleven (11) portables are proposed to address the existing non-conforming student enrollment at Cascade Christian. The existing vested capacity from the previous CUP for CCS is 925 students. With the addition of the elementary students, the current enrollment is 995 students, which means that there are currently an additional 70 students attending CCS than allowed via the 2008 conditional use permit. Prior to the addition of the elementary students, there was a total of 671 junior and high school students
- b. To address the existing traffic concerns on the CCS site, staff has included conditions of approval that will be required to be met to reduce adverse impacts to the surrounding neighborhood. In addition to this, as outlined in the traffic impact analysis, there are current onsite mitigation measures being taken by the applicant (CCS) to reduce traffic impacts to the neighborhood to ease adverse impacts on the neighborhood.
- c. Conditions include capping student enrollment at 1,065 with the utilization of only the existing drop-off/pick-up location on 21st St SE. If student enrollment is to exceed 1,065 students, an alternate access and queuing area from 25<sup>th</sup> St SE or equivalent capacity improvement will be

required along with an associated traffic impact analysis. Full conditions of approval for student capacity and enrollment are included in the conditions at the end of this staff report.

- c. Utility services such as water, sanitary sewer, and storm water are provided. As conditioned, the existing storm pond shall be inspected to verify that the original depth and design are still existing as designed. Should deficiencies be discovered, restoration of the existing storm elements (which are to be utilized for the newly created runoff based on previously approved plans) to previous engineered conditions will be required.
4. That the site is of sufficient size to accommodate the proposed use and all yards, open spaces, walls and fences, parking, loading, landscaping and other such features as are required by this title or as are needed in the opinion of the hearing examiner are properly provided to be compatible and harmonious with adjacent and nearby uses.

Staff Analysis:

- a. The site is large enough to accommodate all eleven (11) portables and meet required development and performance standards of the current code.
  - b. Parking, as addressed in the project description, is currently being met. Minimum parking requirement calculations were based on minimum parking requirement calculations for the most recent Sunrise Elementary School redevelopment. As part of the review for Sunrise Elementary School, the required parking count was based on the minimum required amount of parking for the maximum parking-generating use, which is the gym and auditorium. As a result of this, staff reviewed the CUP proposal for the addition of eleven (11) portables to be consistently with the review of Sunrise Elementary School. The resulting minimum required number of stalls for the gym and auditorium of CCS is 272 stalls.
  - c. Loading (drop-off/pick-up) of students is being addressed via traffic mitigation measures, which include staggered drop-off/pick-up times, implementation of onsite streamlining for elementary pick-up, and revised on-site routing for internal traffic control.
  - d. The scope of the proposed use includes perimeter landscaping along 21<sup>st</sup> St SE where six (6) of the portables will be placed. Landscaping, as required by City code, will enhance the aesthetic buffer between the portables and surrounding properties.
5. That the granting of such conditional use permit will not be contrary to the adopted comprehensive plan, or to the objectives of any code, ordinance, regulation, specifications or plan in effect to implement said comprehensive plan.

Staff Analysis:

Provisions in the City's zoning regulations allow private school facilities as conditional uses in the RS-08 and RS-04 zones. As designed and conditioned, the addition of eleven (11) portables to accommodate the addition of elementary school students to the CCS campus is not contrary to the adopted comprehensive plan, or various code standards and requirements of the City's zoning code.

## **Previous Relevant Conditions of Approval**

### **P-08-0016 CUP Conditions**

- Condition #2 regarding the maximum student population was reduced from a total of 1250 senior and junior high students was reduced to a vested capacity of 925 students due to the actual final build out of the junior high building and associated traffic impact fees paid. This conditional use permit proposes eleven (11) portables, that would result in a conditioned maximum capacity of 1,341 students based on occupant load calculations, which exceeds both the conditioned capacity of P-08-0016 [exhibit 27] and the existing vested capacity. However, traffic mitigation measures are proposed below to properly mitigate the increase in student capacity. Other applicable conditions listed in

#### P-08-0016 SEPA MDNS Mitigation Measures

- SEPA mitigation for frontage improvements and pedestrian crosswalk along the east side of 25<sup>th</sup> St SE. These mitigation measures were removed through a modified MDNS (PLSSP20230073) [exhibit 14] as the applicant (CCS) no longer owns the adjacent parcel (0420351003) that necessitated the original mitigation measures.
- All other mitigation measures listed in SEPA MDNS associated with Conditional Use Permit P-08-0016 remain fully valid and enforceable.

### **STAFF RECOMMENDED HEARING EXAMINER CONDITIONS**

Staff recommends approval of this conditional use permit with the following conditions:

#### PLCUP20240037 - Traffic Conditions

- Traffic Impact fees (TIF) will be assessed in accordance with fees adopted by ordinance, per PMC 21.10. Impact fees are subject to change and are adopted by ordinance. The applicant shall pay the proportionate impact fees adopted at the time of building permit application. The TIF will be paid to the 1,341 student limit allowed with the approval of the CUP.
- Depending on building valuation thresholds defined within Puyallup Municipal Code Section 11.08.135, the applicant/owner would be expected to construct half- street improvements including curb, gutter, sidewalk, roadway base, pavement, and street lighting. Any existing improvements which are damaged now or during construction, or which do not meet current City Standards, shall be replaced.
- Previous conditions identified with Standalone SEPA (PLSSP20230073) to amend the SEPA MDNS issued alongside the P-08-0016 CUP are expired and are not relevant to the current proposal.
- During civil review, the applicant shall evaluate existing frontage for compliance with current ADA/City Standards.
  - The site design must provide ADA-compliant internal sidewalks/pedestrian pathways that connect to all public access points/sidewalks.
- To mitigate public concerns related to parking availability for sporting events, Cascade Christian must keep the on-site parking lot open and available to the public when events are hosted on-site. On-street parking options are very limited in this area.
- With the proposed Conditional Use Permit (CUP) approval, campus will be allowed to operate at a maximum student capacity of 1,341 students, compared to the present 925 students. To adequately mitigate traffic queuing impacts, the following countermeasures and conditions are required:
  - With utilization of only the existing drop off / pick up location on 21st St SE, students will be capped at 1,065, which is a 15% increase over the present 925 students (vested capacity).

- CCS has implemented numerous countermeasures to help mitigate congestion. These have been helpful and such efforts must continue to be put into place, and further refined and improved. Examples include:
  - CCS personnel assisting motorist on-site to improve efficiency.
  - Optimization of on-site routing and pick-up/drop-off locations.
  - Staggering start and end times of secondary school and elementary school.
  - Training for CCS staff to streamline pick-up/drop-off procedures.
  - Continue to refine and modify on-site routing configurations.
  - Continue to refine and modify in-bound/out-bound channelization.
  - Consider off-site van or bus service to shuttle students on/off campus.
  - Implement other strategies to enhance efficiency.
- Approximately 6 months from final installation of the portables to be allowed by the CUP approval, a meeting will be held on site while school is in session at CCS with City staff to observe drop-off / pick-up procedures and functional operation.
- Prior to the submittal of any new/future permit, development application, conditional use permit application, or modifications as part of the CCS campus (including properties owned by Friends of CCS), CCS will be required to evaluate operational issues caused by excessive queuing along 21st Street SE.
  - If the existing congestion on 21st Street SE has not been substantially mitigated by the countermeasures listed above, the applicant will be required to construct a secondary access and queuing area from 25th Street SE or equivalent capacity improvement. The term “substantially mitigated” will be evaluated quantitatively using the following methodology:
    - For any 3-day period within a normal 5-day school week, static southbound vehicle queues on 21st St SE shall not extend to 7th Ave SE for any duration. This requirement will apply to all time periods throughout the day (High School, Junior High, Elementary).
  - Alternatively, if student enrollment exceeds 1,065 students, up to a maximum of 1,341 students, an alternate access and queuing area from 25th Street SE or equivalent capacity improvement will be required. The alternative access and queuing area (adjacent to 25th Street SE) is expected to be paved and must meet City engineering standards. The City will require academic quarterly updates on student enrollment to assess this condition. Additionally, a traffic analysis will be required during the preliminary review of the access on 25th Street NW.

PLCUP20240037 - Engineering Conditions

- Pursuant to PMC 21.10.230 and 21.10.260, the existing pond shall be inspected to verify that the original depth and design are still existing as designed. Should deficiencies be discovered, restoration of the existing storm elements (which are to be utilized for the newly created runoff based on previously approved plans) to previous engineered conditions will be required.