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BEFORE THE HEARING EXAMINER FOR THE CITY OF PUYALLUP

Emily Terrell, Hearing Examiner

RE: Cascade Christian School Portables Expansion Conditional Use Permit Amendment PLCUP20240037	FINDINGS OF FACT, CONCLUSIONS OF LAW AND DECISION.
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INTRODUCTION

Cascade Christian School has applied for a conditional use permit (CUP) to add eleven (11) new double portables to accommodate the addition of elementary school operations for their campus located at 811 21st Street SE. The proposed portables will include general classrooms, a library, a computer lab, two restrooms, a band room and an administrative office. The project includes associated landscaping and frontage improvements. The application is approved subject to conditions.

ORAL TESTIMONY

A computer-generated transcript of the hearing has been prepared to provide an overview of the hearing testimony. The transcript is provided for informational purposes only as Appendix A.

EXHIBITS

Exhibits 1-28 of the Exhibit List were entered into the record during the April 21, 2025 hearing. The staff PowerPoint was admitted as Ex. 29. A traffic video taken by Heath and Associates was added as Ex. 30.

FINDINGS OF FACT

Procedural:

1. Applicant. Songyi Cho of Jeff Brown Architecture, LLC representing Cascade Christian Schools, 811 21st Street SE, Puyallup, WA 98372.

1 2. Hearing. The Hearing Examiner conducted an in-person (at the City of
2 Puyallup Council Chambers) and virtual (via Zoom) hearing on the application at 11:00
3 am on April 21, 2025. The examiner held the hearing record open until April 28, 2025
4 to allow the City and applicant an opportunity to revise a condition of approval.

5 **Substantive:**

6 3. Site/Proposal Description.

7 a. Current Request. Cascade Christian Schools (CCS) is proposing to add
8 eleven new double portables to the school campus located at 811 21st Street
9 SE. The proposed portables will include general classrooms, a library, a
10 computer lab, two restrooms, a band room and an administrative office. The
11 project includes associated landscaping and frontage improvements. The
12 site already provides 390 parking stalls and exceeds the minimum
13 requirements for parking. ADA compliance for pedestrians is provided and
14 proposed. Full street improvements including curb, gutter and sidewalk are
15 currently located on the road frontages of 21st Street SE and 25th Street SE.
16 To accommodate fire access concurrent with the utilization of the internal
17 site circulation, an additional land width is provided in aisles adjacent to the
18 junior and high school drop off/pick up area. The additional lane width will
19 allow for queuing vehicles to clear a path for fire vehicles. Landscaping is
20 provided along 21st Street SE where six portables will be placed. The
21 landscaping will enhance the aesthetic buffer between the portables and
22 surrounding properties as shown in Ex. 4.

23 b. Prior Approvals. Cascade Christian Schools (CCS) has operated a private
24 school at 811 21st Street SE since approval of a conditional use permit in
25 1995 (CUP 95-65-004). The 1995 CUP was vested for ten years. Since then,
CCS has returned to the City of Puyallup several times seeking additional
approvals for various expansion stages. CCS received approval of a
conditional use permit in 1998 (CUP 98-65-003). In 2008, another
conditional use permit was granted (CUP 08-65-002). In 2009, CCS was
granted another conditional use permit to expand the then existing junior
and senior high schools located at the site by constructing a new 54,510sf
junior high school building, new signage, improvements to the existing
athletic fields, development of a new 4,800sf maintenance building and
expansion of an existing 3,104sf administrative building (P-08-0016). In
that same decision, the examiner granted a variance to reduce landscape
width (P-08-0056) (Ex. 27). The 2009 CUP expired in 2015.

The SEPA determination from the 2009 CUP was not appealed and remains
in force. However, CCS sold a piece of property that was the subject of a
SEPA mitigation measure requiring frontage improvements and a
pedestrian crosswalk along the east side of 25th Street SE. The associated

1 mitigation measures were removed through a modified SEPA MDNS
2 (PLSSP20230073, Ex. 14 removing SEPA Mitigation Measure #2 from the
3 MDNS associated with CUP P-08-0056).

- 4 c. Maximum Number of Students. The 1995 CUP contemplated a total of 900
5 students (Ex. 27, page 6, Finding of Fact No. A4c). The 1998 CUP limited
6 the number of students to 500 until more traffic mitigation could be
7 completed (Ex. 27, Finding of Fact No. A4c1). The 900-student cap
8 remained. The required mitigation, installation of a traffic light at 21st Street
9 SE and Pioneer Way, was completed in 2002. However, in CUP 08-65-002,
10 the City argued the traffic mitigation only accounted for a total of 625
11 students and set the legal student capacity at that level (Ex. 27, page 7,
12 Finding of Fact No. Ac2).

13 For the 2009 CUP (P-08-0016), CCS requested a new cap of 1,250 students,
14 evenly split between junior and high school students. Though CCS stated
15 there was a future desire to add elementary education to the campus, no
16 elementary age students were permitted under the 2009 conditional use
17 permit (Ex. 27).

18 In the 2009 CUP, the examiner affirmed the completed traffic mitigation
19 from 2002 created a maximum permissible student population at the time
20 of 625 students until such time as additional traffic mitigation was
21 completed (Ex. 27, Conclusions of Law, 1c).

22 The 2009 CUP decision raised the maximum student enrollment from 625
23 students to 1,250 students, with the implementation of additional traffic
24 mitigation measures (CUP P-08-0016, Condition of Approval #2, Ex. 27).
25 The examiner stated at the time “new traffic mitigation fees and traffic
calming measures will be required to handle the number of trips generated
by an increase in 625 students” and that the City’s Traffic Engineer had
concluded the implementation of two traffic calming measures, the
installation of permanent radar signs and the payment of traffic impact fees,
would adequately accommodate for the maximum of 1,250 students (Ex.
27, page 7, Findings of Fact No. 4c2)¹.

The staff report for this decision states, “the existing vested capacity from
the previous CUP for CCS is 925 students” (Ex. 1, page 5). However, as
shown above, the most recent decision did not set the student capacity at
925, it limited the capacity to the mitigated 625 students until further
mitigation was performed, at which time the total student population could

¹ This is the only mention of these mitigation measures in the record. The record does not contain copies of CUP 95-65-004 or CUP 08-65-002. The record also does not contain the associated staff report and exhibits for P-08-0016 or P-08-0056.

1 be raised to as much as 1,250 students (Ex. 27, P-08-0016/P-08-0056
2 Decision). Hearing testimony from the April 21, 2025 hearing by the CCS's
3 traffic engineer states the radar signs are in place. The other mitigation
4 measure, the payment of traffic impact fees, resulted in the current vested
5 student capacity of 925 students. The final build out of the junior high
6 resulted in fewer students than previously anticipated. CCS ultimately paid
7 traffic impact fees for a maximum of 925 total students (Ex. 1, pages 6-7).

8 In the current application, the Traffic Impact Analysis states the maximum
9 capacity for the proposed 11 new portables would allow for a total of 1,341
10 students. However, CCS anticipates a maximum enrollment of 1,100 in the
11 coming years (Ex. 9). The Architect's narrative states the current junior and
12 high school enrollment is 591 students and the additional classrooms will
13 reflect a capacity for 416 new students, bringing the total potential student
14 population to 1,007 students (Ex. 10).

15 d. Expansion of Use without Permit Approval. The various CUP approvals for the
16 campus only allowed for junior and high school students. In 2009, the examiner
17 explicitly denied CCS's request to state a portion of the campus would be the
18 future site of an early childhood and elementary school wing (Ex. 27, Page 11).
19 Though CCS had stated there were future plans to include elementary school
20 grade levels, this use was not permitted on this site. Nonetheless, CCS added
21 an elementary school to the campus in 2024 without land use approval by the
22 City.

23 e. Current Student Population. The current total student population figure is
24 unknown. The Staff Report and the Traffic Impact Analysis (TIA) both state
25 there are currently a total of 995 students, of which 671 are junior and high
school students plus the recent unauthorized addition of 324 elementary
students (Ex. 1 and 9). The SEPA Checklist (Ex. 3) states there are 616 junior
and senior high school students plus 325 elementary school students for a total
of 941 students. The Architect's narrative states the junior and high school
students account for 591 students. The Architects do not mention the
elementary school population (Ex. 10). Trip rates used in the TIA were based
on field counts. There were 960 students in attendance on the day of the field
counts. This was the base level for the traffic analysis with a projected increase
of 195 students once the portables are in. Future trips were based on 1,155 total
students in attendance on any given day, or 86% of the maximum capacity
based on the campus footprint (Ex. 9, page 28).

4. Characteristics of the Area. The surrounding land uses adjacent to the
subject property including existing single-family homes to the north, west, east and
south. Other land uses include an undeveloped parcel to the east and a commercial
development, the Northwest Christian School and Shaw Road Elementary School.

1 5. Adverse Impacts. As conditioned and mitigated, no adverse impacts are
2 anticipated. The SEPA Determination of Non-Significant Impact was not appealed.
3 Relevant areas of potential impact are discussed below.

4 a. Critical Areas. No impacts to critical areas are anticipated. Though a portion of
5 the overall site is within the 100-year floodplain, the area of the proposed
6 improvements is not within either the mapped floodplain or within a shoreline
7 jurisdiction. The site is within both the volcanic hazard area and an aquifer
8 recharge area. The City has determined with proper stormwater management,
9 there will be no impact to the aquifer recharge area. The entire valley is within
10 the volcanic hazard area. No individual mitigation measures are possible to
11 reduce the threat of volcanic activity.

12 b. Fire. As proposed, no impacts to fire and life safety are anticipated. The
13 applicant has provided for fire access by proposing an additional lane width in
14 the parking lot queueing aisles adjacent to the junior and high school drop-
15 off/pick-up area. This extra lane width should allow waiting traffic to move out
16 of the fire truck's path.

17 c. Traffic. As conditioned, all traffic impacts are mitigated. By far the largest
18 concern expressed by the public is traffic impacts. Commentors stated traffic
19 around the school has always been an issue, but the addition of the elementary
20 traffic took a bad situation and multiplied it (Ex. 16, Ex. 23 Hudson and Ex. 24
21 Wolff). Early in the school year traffic backed up on 21st Street SE to the E.
22 Pioneer intersection and on E. Pioneer as parents queued to drop off and pick
23 up their students. The intersections of 21st Street SE at both 7th Avenue SE and
24 9th Avenue SE were blocked. The traffic blocked emergency access and
25 prevented residents from leaving or entering their neighborhoods (Ex. 23, 24,
and 25). Parents were also using adjacent neighborhood side streets as cut
through routes (Ex. 23). The traffic noise could be heard inside adjacent homes
because of the speed bumps and honking (Ex. 25 Crouse).

The CCS campus has one-way ingress and access points along 21st Street SE
located about 175 feet from each other. 21st Street SE is a two-lane road of about
32-24 feet wide. There are two speed tables, separated by 530 feet and
accompanied by 15 mph advisory speed signs along the roadway segment north
and south of the school. There is also a radar speed sign installed in the
southbound direction, south of Pioneer Way E (Ex. 9).

The applicant's traffic engineers evaluated the site and seven associated
intersections several times including April 2024, May 2024, October 2024,
December 2024 and January 2025. The evaluations included the heaviest traffic
times for both the school itself (the start and end of the school day) and the
traditional PM Peak hour to account for both school traffic and commuter traffic
(Ex. 9).

1 The traffic engineers found in April 2024 that traffic related to the school
2 backed up along 21st Street SE and in the left-turn lane serving 21st Street SE
3 on Pioneer Way E for about 25 minutes in the morning for the start time of the
4 junior and high schools and again for another 15 minutes during the elementary
5 start time. For the elementary school drop off, the queue did not extend past the
6 intersection with 7th Avenue SE except for a brief queue at 8:20 am that created
7 a 350-foot-long line of stopped vehicles. The queue along 21st Street SE was
8 continuously moving but slow. However, some vehicles waited through
9 multiple cycles of the light at 21st Street SE and Pioneer Way E before they
10 could turn left. The level of service at the entry drive and 21st Street SE was a
11 LOS E during the AM peak. The afternoon pick-up created a more continuous
12 queue for almost an hour with the longest queue extending out onto 21st Street
13 SE/Pioneer Way E for about five minutes but with a maximum off-site queue
14 length of 1,600 feet. Queues also extended to 7th Avenue SE and 21st Street SE
15 (Ex. 9).

16 The traffic engineers evaluated the effectiveness of the existing speed tables
17 using the existing radar speed feedback sign. They found that during free-flow
18 conditions (without influence from the school), the average speed was 24 mph
19 with an 85th percentile of 27 mph. The posted speed limit is 25 mph without a
20 reduced zone speed limit. Therefore, additional traffic calming measures were
21 not required (Ex. 9).

22 Based on the above, CCS worked to incorporate several mitigation measures to
23 improve conditions. These included:

- 24 1. Staggered Drop-Off and Pick-Up Times by level. The staggered beginning
25 and ends times for elementary school versus the junior and high schools
created a 30-45 minute offset that minimizes traffic overlap and reduces
congestion during peak times.
2. Implementation of Driveline – A Student Pick-Up Management Tool. Staff
input student ID numbers as vehicles arrive, streamlining and improving
efficiency during the pick-up process.
3. Signage. A-frame signs were placed along 9th Street, indicating no parking
or driveway blocking zones to improve traffic flow and reduce obstructions.
4. Increased On-Site Staffing and Traffic Control.
 - a. Additional staff were deployed to manage traffic flow efficiently.
This involves staff directing vehicles around the back of the school
when queues start to accumulate near 21st Street SE.
 - b. CCS established an “on-call” response team to provide additional
traffic support during peak times, if needed.

1 c. Staff, volunteers, and security personnel have been trained to assist
2 with drop-off and pick-up procedures, enhancing overall efficiency.

3 5. Parental Communication and Engagement. Parents were informed of the
4 procedural changes and educated on the importance of a quick and efficient
5 drop-off and pick-up process to minimize delays and improve overall traffic
6 operations.

7 6. Revising On-Site Routing. Several changes were made to the on-site drop-
8 off/pick-up areas to assess the most efficient plan.

9 7. Elementary Pick-Up Protocol. To reduce the off-site queues, the elementary
10 school has implemented a rotating system where one grade level per week
11 is designated to park on-site and use a walk-up pick-up process instead of
12 entering the vehicle pick-up queue. This approach optimizes the use of
13 available parking spaces during pick-up times and helps reduce the overall
14 queue lengths (Ex. 9).

15 The traffic engineers repeated their study in December 2024 and January 2025.
16 With the implementation of the mitigation measures, traffic improved
17 significantly. The vehicle queue dropped from 40 or more vehicles to 6-8
18 vehicles (Ex. 9).

19 With respect to trip generation, at the final peak enrollment of 1,341 students,
20 the campus is expected to generate an additional 291 AM peak hour trips and
21 235 PM peak hour trips over the existing conditions. At maximum capacity,
22 with the assumed year of 2031, the entry drive on 21st Street SE falls to a LOS
23 of F in the AM peak hour but remains above a C in the PM Peak. The failed
24 LOS condition is expected to last only 10-15 minutes maximum on any given
25 day. The traffic engineer felt the estimate was conservative and that no
additional mitigation measures were necessary (Ex. 9).

The City and applicant have agreed to suggested mitigation measures. This
Decision adopts the following as a framework for the required conditions of
approval:

1. With utilization of only the existing drop-off and pick-up location on 21st Street SE, students will be capped at 1,065.
2. CCS will continue to refine and modify the on-site routing configurations, channelization, training of CCS staff for streamlined pick-up and drop-off procedures, consideration of off-site van or bus service to shuttle students on and off campus, and other strategies to optimize pick-up and drop-off activity.

- 1 3. Approximately six months from final installation of the portables, a meeting
2 will be held on site while school is in session at CCS with City staff to
observe drop-off and pick-up procedures and functional operation.
- 3 4. Payment of Traffic Impact Fees will be evaluated separately and is based
4 on the previous vested capacity (925 students) compared with the proposed
student capacity (1,341 students).
- 5 5. Prior to the submittal of any new/future permit, development application,
6 conditional use permit application or modifications as part of the CCS
7 campus (including properties owned by Friends of CCS), CCS will be
8 required to evaluate operational issues caused by excessive queuing along
9 21st Street SE. If the existing congestion on 21st Street SE has not been
10 substantially mitigated (with a review of queue lengths), the applicant will
11 be required to construct a secondary access and queuing area from 25th
12 Street SE or equivalent capacity improvement. Alternatively, if student
13 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. Additionally, a traffic analysis will be required
during the preliminary review of the access on 25th Street NW.

14 Improvements to signalization along Pioneer Way E should also positively
15 impact traffic in the area. The City of Puyallup's Six-Year Comprehensive
16 Transportation Improvement Program (2023-2028) includes a project on
17 Pioneer Way E for the five intersections from 5th Street SE to Shaw Road
(Project #25). This project will deploy intelligent transportation system signal
improvements that should result in smoother flowing traffic along Pioneer Way
E. The project will cost \$2,100,000 and should be started before 2028 (Ex. 9).

- 18 1. Noise. As conditioned, no noise impacts are anticipated. Kelly Crouse noted a
19 persistent trend of honking horns from drivers frustrated by traffic, parents
20 signaling to their kids during the pick-up and students in the parking lot
21 encouraging passing drivers to honk their horns during games and other events
22 (Ex. 16 and 25). The traffic issues are addressed above. A condition of approval
23 will require the applicant to place prominent signage at all vehicular access
points and within the parking area reminding drivers not to honk horns and to
be respectful of the neighboring residents.
- 24 d. Utilities. As conditioned, no impacts to the service levels of utilities is
25 anticipated. Water, sanitary sewer and storm water facilities are provided by the
City. The City has the capacity to provide these services to include the
maximum capacity of students (1,341 students) based on the floor space. There
is an existing stormwater pond on site. A condition of approval will require the

1 applicant to demonstrate this facility is adequate to serve the present proposal
2 and again for any subsequent development.

- 3 e. Safe Routes to School. As conditioned, pedestrian safety will be adequately
4 addressed. Neighbors expressed concerns about whether there were adequate
5 safe routes to school (Ex. 16). Presently 21st Street SE has a sidewalk extending
6 from the site frontage to Pioneer Way E. The City plans to eventually extend
7 sidewalks south of the current terminus (City of Puyallup Comprehensive Plan
8 Transportation Element Pedestrian Priority Network, Maps 7-8) (Ex. 9).

9 Pioneer Way E. has a sidewalk along the south side. The City of Puyallup's Six-
10 Year Comprehensive Transportation Improvement Program (2023-2028)
11 includes a project on Pioneer Way E from 21st Street SE to Shaw Road (Project
12 #8). This project will include the design and construction of a shared use path
13 at a cost of \$5,300,000 and should be started by 2028 (Ex. 9). This project
14 should increase safe routes to school and to nearby retail and residential areas
15 along Pioneer Way E.

16 9th Avenue SE is directly across from the CCS campus. Sidewalks are available
17 on both sides of this roadway. To the north is 7th Avenue SE. This roadway
18 currently lacks pedestrian improvements. The City has listed this road in both
19 the Pedestrian Priority and Bicycled Priority Networks portions of the City's
20 Comprehensive Plan for a future shared-use pathway.

21 The Puyallup Municipal Code requires the applicant to construct frontage
22 improvements for new projects and improve existing frontage improvements if
23 the current infrastructure is inadequate to meet the code. A condition of
24 approval will require the applicant to either demonstrate the adequacy of
25 existing infrastructure or construct new code compliant infrastructure including
sidewalks along the project frontage.

CONCLUSIONS OF LAW

Procedural:

1. Authority of Hearing Examiner. PMC 20.80.005 authorizes the hearing
examiner to hold a hearing and issue final decisions on conditional use permit
applications. PMC 20.80.031 allows administrative approval of minor additions or
modifications to sites and structures in an existing valid conditional use permit.
However, the proposed changes for this permit amendment exceed the threshold for
administrative approval.

1 required mitigation measures and conditions of approval, no traffic impacts from both
2 the recent unauthorized expansion of the use to include the elementary school and any
3 future growth in the student population are anticipated as described in Finding of Fact
4 No. 5c. As conditioned, any potential impacts to the municipal stormwater system will
5 be mitigated (See Finding of Fact No.5d).

6 **PMC 20.80.010(4):** *That the site is of sufficient size to accommodate the proposed use
7 and all yards, open spaces, walls and fences, parking, loading, landscaping and other
8 such features as are required by this title or as are needed in the opinion of the hearing
9 examiner are properly provided to be compatible and harmonious with adjacent and
10 nearby uses;*

11 7. Criterion met. As shown on Ex. 4 the Site Plan, there is adequate space to
12 accommodate the eleven proposed portables and additional queueing area while still
13 meeting the required build and dimensional standards. The campus already exceeds the
14 minimum thresholds for parking (Ex. 1). The traffic mitigation measures as described
15 in Finding of Fact No. 5c will allow for pick up and drop off of each level of school
16 with minimal impact from queueing on adjacent roadways Landscaping, including the
17 perimeter landscaping along 21st Street SE will meet the City code and enhance the
18 aesthetic buffer between the portables and surrounding properties (Ex. 4 and Finding
19 of Fact 3a).

20 **PMC 20.80.010(5):** *That the granting of such conditional use permit will not be
21 contrary to the adopted comprehensive plan, or to the objectives of any code,
22 ordinance, regulation, specifications or plan in effect to implement said comprehensive
23 plan.*

24 8. Criterion met. As described in the staff report (Ex. 1), the proposed project
25 is consistent with the objectives of the City of Puyallup's Comprehensive Plan. As
conditioned, the project will comply with the City's codes, ordinances, regulations and
specifications.

20 DECISION

21 Based upon the findings of fact and conclusions of law above, the requested conditional
22 use permit application is approved subject to the following conditions:

- 23 1. Traffic Impact Fees (TIF) will be assessed in accordance with fees adopted by
24 ordinance, PMC 21.10. Impact fees are subject to change and are adopted by
25 ordinance. The applicant shall pay the proportionate impact fees adopted at the
time of building permit application. Payment of Traffic Impact Fees will be
evaluated based on the previous vested capacity (925 students) compared with
the proposed student capacity (1,341 students). The TIF will be paid to the
1,341-student limit allowed with the approval of the CUP.

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2. Unless adequate frontage improvements exist pursuant to PMC 11.08.135(6), the applicant/owner shall construct half-street improvements including curb, gutter, sidewalk, roadway base, pavement, and street lighting pursuant to PMC 11.08.135(3) on adjacent street frontages. Any existing improvements which are damaged now or during construction, or which do not meet current City standards, shall be replaced.
3. Internal pedestrian improvements and external frontage improvements shall be contiguous and ADA compliant.
4. The on-site parking shall be open and available for public use during all on-site sporting events.
5. To adequately mitigate traffic queuing impacts, the applicant shall:
 - a. Maintain active personnel to direct vehicles into and through internal drop-off/pick-up queues during all start and end times.
 - b. Maintain optimization of on-site routing through internal drop-off/pick-up queues and in-bound/out-bound channelization.
 - c. Maintain staggered start and end times for elementary and secondary schools.
 - d. Establish a program to encourage ride sharing for students with residents located proximally to each other and provide the City with an annual progress report.
6. The applicant shall monitor queue lengths during the academic day to ensure the static southbound vehicle queues along 21st Street SE do not extend to 7th Avenue SE more frequently than twice a week and for no more than ten minutes on any given day. If queue lengths exceed this threshold more than three times per school year, the applicant shall commission a traffic study and implement the recommended mitigation measures to ensure the standard is met.
7. Total student enrollment on the existing campus is limited to 1,065 students while utilizing only the existing access/egress on 21st Street SE in its current configuration. Total student enrollment may be increased to a maximum of 1,341 students if an alternative access point and a queuing lane are constructed on 25th Street SE and/or if equivalent improvements are made to 21st Street SE such that Condition 7 above is maintained. All improvements must comply with City standards and be accompanied by a traffic analysis prepared by a qualified traffic engineering firm.
8. Approximately six months from final installation of the portables, a meeting will be held on site while school is in session at CCS with City staff to observe drop-off and pick-up procedures and functional operation.

