



MITIGATED DETERMINATION OF NONSIGNIFICANCE

SUMNER SCHOOL DISTRICT NO. 320 SUMNER HIGH SCHOOL MODERNIZATION AND ELHI HILL EDUCATIONAL PROGRAM

Description of Proposal (also "Project"):	The Sumner School District proposes to: (i) modernize the existing High School with 51,922 sq. ft of new space and approximately 70,393 sq. ft. of the current building's 183,350 sq. ft. will be demolished and re-built to house a new glass facade, Two-Story Library Wing housing a relocated Commons Area (on the second floor) with attached courtyard, a new Three-Story Academic Wing, modernization of classrooms and support services, and entrance upgrades; and (ii) re-locate the Elhi Hill Educational Program to the former Multi-Care Medical Building (adjacent to the High School) with phased interior and some exterior improvements and additional parking on two adjoining District parcels with two existing houses to be demolished. In conjunction with the High School Modernization component of the Project, the existing Swimming Pool will be demolished and additional parking will be created on two adjoining District parcels. Existing houses on these parcels will be demolished. Construction staging areas will be located on adjoining District parcels and the existing houses located on these parcels will be demolished. The portable classrooms located on the North Parking Lot of the High School will be removed upon completion of the Project.
Project Proponent:	Sumner School District No. 320 ("District") 1202 Wood Avenue Sumner, WA 98390
Project Location:	Sumner High School (existing campus) 1707 Main Street Sumner, WA 98390 Adjoining Parcels for additional parking: 1111 and 1101 Wood Avenue Sumner, WA 98390 Construction Staging Areas: 1424, 1428, and 1506 Mason Street 1101 and 1111 Wood Avenue Sumner, WA 98390 Elhi Hill Educational Program 1518 Main Street with additional Parking on 914 and 908 Meeker Avenue Sumner, WA 98390
Parcel Numbers:	Existing High School Campus (Parcel Nos. 0420244205) Wood Avenue Parcels (Parcel Nos. 4445000020 and 445000010) Mason Street Parcels (Parcel Nos. 4445000060, 4445000070, and 4445000110) Elhi Hill Educational Program and Adjoining Parcel (Parcel Nos. 2350000060, 2350000100, and 2350000110)

Lead Agency: Sumner School District No. 320

Date of Issue of MDNS: April 26, 2018

Date of Comment May 11, 2018
Deadline: 5:00 p.m.

Sumner School District No. 320 (the "District") has determined that the Proposal with the mitigation measures which are incorporated into the Proposal and as set forth hereinbelow does not have a probable significant adverse impact on the environment. Therefore, an environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed Environmental Checklist submitted by the District, engineering reports and other information on file with the District. This information is available to the public on request.

This Mitigated Determination of Nonsignificance (MDNS) is issued under WAC 197-11-350. Comments must be submitted by closing of the Comment Deadline. The Responsible Official may reconsider the MDNS based on timely comments and may retain or modify the MDNS. If the MDNS is retained, it will be final after the expiration of the applicable appeal period.

Responsible Official: Laurie Dent
Position/Title: Superintendent
Responsible Official
Sumner School District

Address: Sumner School District
1202 Wood Avenue
Sumner, WA 98390

Telephone: 253-891-6000

Name of Agency adopting document: Sumner School District No. 320

Signature: 
Laurie Dent
Superintendent
Responsible Official

Date: April 26, 2018

NOTE: Pursuant to RCW 43.21C.075, the final decisions of the Responsible Official may be appealed in accordance with Sumner School District SEPA Policy 6890 and SEPA Regulations & Procedures 6890P. In accordance with Sumner School District SEPA Regulations & Procedure No. 6890P(10), the District will issue a Notice of Action pursuant to RCW 43.21C.080 with the applicable appeal period. Any action to set aside, enjoin, review, or otherwise challenge such action on the grounds of noncompliance within the provisions of Chapter 43.21 RCW (State Environmental Policy Act) shall be commenced in Pierce County Superior Court.

FINDINGS OF FACT

General/Land Use

1. An environmental review is required for the Project in accordance with the State Environmental Policy Act (SEPA), RCW ch. 43.21C and under the City of Sumner Code (SMC). In accordance with SEPA, the District Policy 6890 and District Regulations & Procedures 6890P, the District notified the City of Sumner ("Sumner" or "City") that it was acting as Lead Agency for purposes of SEPA review as authorized under SEPA. The District submitted to the required agencies and distributed the SEPA Checklist and posted notice of its SEPA Checklist in accordance with SEPA and District Regulations & Procedures 6890P. The Comment Period for the SEPA Checklist expired March 22, 2018.
2. The High School modernization component of the Project will be located on the existing High School campus at 1707 Main Street, Sumner, Washington together with proposed adjoining additional parking to be constructed on two District parcels located at 1111 and 1101 Wood Avenue for a total of 26.8 acre site. Construction staging areas will occur on abutting parcels located at 1111 and 1101 Wood Avenue and 1424, 1428, and 1506 Mason Street; however, no improvements are associated with these parcels, and therefore, these parcels are not included in the total acreage of the High School. The former Multi-Care medical building which currently houses offices for District Staff is located at 1518 Main Street. Interior improvements and some minor exterior improvements will be made to the existing Multi-Care building in phases. Additional parking will be created on District parcels located at 914 and 908 Meeker Avenue.
3. 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" upon approval of a Conditional Use Permit ("CUP"; SMC 18.12.040E) consistent with criteria established under SMC 18.48.050. 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 Multi-Care 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 (SMC 18.16.020(47) and 18.12.040E).
4. The District submitted a Conditional Use Permit, dated March 2, 2018 and a Special Exception for Height, dated February 28, 2018, for a new Two-Story Library (with a second story re-located Common areas) and a new Three-Story Academic Wing together with an Environmental Checklist, dated March 2, 2018.
5. Sumner School District proposes to modernize the existing Sumner High School located on approximately 26.8 acres by demolishing and re-building approximately 70,393 sq. ft. with new instructional space and appurtenant support services and by adding approximately 51,922 sq. ft. of new instructional space. The modernized High School is proposed to house 1830 students an increase of 33 students from the current 1797 student count (OSPI June 2017 Report), inclusive of the Elhi Educational Program. The current Staff of 150 would not increase with the Project. The modernization project at Sumner High School, therefore, principally is intended to relocate students currently housed in portable classroom space and to add needed additional instruction space for the re-unified student body and to provide classroom space to add additional functional and flexible educational space, to satisfy technology needs, for interdisciplinary studies and innovative teaching methods, and to refurbish existing instructional spaces. Students currently housed in eight double-wide portable classrooms in the area known as the North Parking Lot will be relocated to the modernized High School

upon completion of the Project and the portable classrooms will be removed from the North Parking Lot.

6. On-site parking will be significantly expanded by the construction of new parking lots on Wood Avenue and with the Elhi Hill Educational Program and the re-opening of the North Parking Lot to full capacity with removal of the existing portable classrooms now located on the North Parking Lot (upon completion of construction). The Project will expand on-site (off-street) parking by 224 parking stalls for a total of 688 parking stalls. Two residential structures owned by the School District on adjoining property located at 1111 and 1101 Wood Avenue will be demolished for the construction of a surface parking lot (the Wood Avenue Parking Lot). Landscaping will also provide buffers around the new parking lots. Solid fencing where appropriate abutting the residential properties will be installed as an additional screening measure in the Elhi Hill Parking Lot.
7. The existing swimming pool will be demolished in 2019 and two new tennis courts will be located in the area of the current swimming pool. The construction project will be phased in order to move students in and out of temporary portable classrooms during demolition and re-building. Eight existing portables together with sixteen portables to be permitted by the City on the North Parking Lot, two comfort stations, and an office portable that will be moved onto the North Parking Lot will house students temporarily as necessary during construction. All portables will be removed following completion of construction of the modernization of Sumner High School.
8. Three residential structures owned by the School District at 1424, 1428, and 1506 Mason Street will be demolished and used for construction staging in addition to existing tennis court area as well as Wood Avenue parcels (until parking improvements are completed). There are no plans for future improvements at the present time for these parcels on Mason Street. In conjunction with construction staging, the District has imposed upon the Project a Construction Management Plan. The Construction Management Plan sets will be part of the contractual obligation of the construction contract and will be monitored by the District. The elements of the Construction Management Plan are set forth in detail under the Mitigation Conditions of the Project below; however, the Construction Management Plan is intended to: (i) provide safety and security for and compatibility with school operations and the surrounding area, (ii) include hours of operation, (iii) manner and routing of trucks and equipment, (iv) protection of construction areas for safety and security, and (v) coordination and consultation with the City of Sumner prior to commencement of any construction or demolition.
9. Rebuilt and new areas of the Sumner High School Modernization include: (i) a new Main Entry area to provide a controlled entry for enhanced safety and security for the high school, (ii) a new Commons area to be used as the cafeteria and as a core hub of the High School for multi-function space needs, team building, socialization and relationship building, interdisciplinary instructions, and student activities; a portion of the second floor of the Commons will house a new Library equipped with technology upgrades, (iii) a new Three Story Academic Wing which will face Sunset Stadium to provide needed classroom and laboratory spaces, (iv) improved physical educational space, including aerobics, mat room, and fitness room, (v) the music wing which will be relocated and expanded, (vi) additional performing, industrial, and graphic arts instructional space, (vii) new special education classroom space with support facilities; (viii) relocation of the Performing Arts Center entry to orient the PAC entry with a new plaza area connected to the West Parking Lot and North Parking Lot for ease of access and parking.
10. The modernization of the existing High School will:
 - (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.

11. Location of the Elhi Hill Educational adjacent to the existing High School campus (former Multi-Care building on Main Street) provides the ability to join and re-connect the Elhi Educational Program with the High School to maximize resources and expand opportunities for student development. Re-locating the Elhi Hill Program provides convenient access to bus transportation services at the High School Campus, additional resources and activities for Elhi Hill students, the ability to easily attend classes offered only at the High School Campus, 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.
12. The school bus load and unload area of the High School campus will be re-located from Main Street to Mason Street along School District owned frontage and will exit to Washington Street through the drive aisle of the North Parking Lot. An additional school bus and unload area for special education busses will be located along the easterly portion of the West Parking Lot and will exit to Mason and to Washington Street through the drive aisle of the North Parking Lot. Five special educational buses will load and unload along easterly portion of the existing West Parking Lot and will exit via the same route onto Mason to Washington Street.
13. Exterior pole lighting in the new parking lots, on District property along Mason Street, and mounted lighting on the structures will be installed for security and safety of students and staff. All exterior lighting will be equipped with LED fixtures and motion sensors to provide for the dimming of the lighting to 50% unless motion is detected. In addition, all exterior lighting will be operated through the District's lighting program schedule to control the hours of operation.
14. The Project has been designed to provide compatibility with the surrounding neighborhood. The City Code allows height exceptions for schools and church uses through a Special Exception process, allowing height deviations up to 50'. 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 area and is oriented north and south on the easterly end of the High School campus facing Sunset Stadium. The new Three-Story Wing is significantly set back from Mason and Washington Streets. Similarly, the new Two-Story Wing which houses the Library and the re-located Commons area on the second floor, sets back approximately 230 feet from the northerly boundary of Main Street and approximately 300 feet from the southerly residential area. These setbacks create a stepped transition area and visual separation from the residential areas.
15. In addition, Masonry, wood-grain cement board, and metal siding will be used with gable rooflines on the new and rebuilt areas which provide a Northwest style architectural compatible with the surrounding area. Large clerestory windows with metal framing will be used in the Library, Commons, and the Three Story Academic Wing to bring natural lighting to these new buildings. In addition, the

use and placement of these windows will modulate the appearance and provide an ornamental element of architecture. The requested height deviations do not interfere with any existing views of the surrounding neighborhoods. The existing height of the High School Performing Arts Center is 56'10", the roof of Sunrise Stadium rises to about 41', and the maximum height of the existing two story wing on the High School campus is about 38'. Therefore, the requested deviations for new Two-Story Library with Commons and the new Three-Story Academic Wing are consistent with existing heights on the High School campus to allow compact development. The City's Comprehensive Plan, consistent with the goals of the Growth Management Act, RCW ch. 36.70A, supports and encourages compact development in the Urban Area.

16. The following comments were received by the District on the Environmental Checklist:
 - o Email, dated March 12, 2018, from the City of Edgewood; Edgewood indicated it had no comments.
 - o Email, dated March 14, 2018, from Tristan Canty, resides adjacent to 908 Meeker Avenue, requesting drawings of the parking lot proposed at 908 Meeker Avenue. [The District has communicated with the neighbor.]
 - o Letter, dated March 22, 2018, from the Washington State Department of Ecology ("Ecology") commented on remediation of former contamination in courtyard of existing High School campus and stated Ecology customary comments relating to notification in the event of discovery of any onsite contamination, water quality requirements, and condition of issuance of a required Construction General Stormwater Permit.
 - o Letter, dated March 22, 2018, from the City of Sumner, requesting frontage improvements, and requesting a mitigating condition for a traffic mitigation fees in the event of increase of student population or staffing or in building area, including new portable classrooms.
17. The following documents were submitted by the District and were reviewed in conjunction with the environmental review of the Project under the Environmental Checklist and in conjunction with the comments received thereto by the District:
 - Project CUP Site Plan, dated February 19, 2018, prepared by AHBL Engineers (required information for CUP Permit)
 - Project CUP Criteria Letter, dated March 2, 2018, prepared by BLRB Architects
 - Sumner High School Modernization Request for Height Exception, dated February 28, 2018, prepared by BLRB Architects
 - Sumner High School Modernization Aerial Site Plan Rendering, dated January 31, 2018, prepared by BLRB Architects
 - Sumner High School Modernization Height Exception Roof Diagram with Three Story Academic Wing Elevation and Library Elevation, dated February 19, 2018, prepared by BLRB Architects
 - Sumner High School Modernization Exterior Views, dated January 31, 2018, prepared by BLRB Architects

- The Project Parking Plan Diagram, dated February 22, 2018, prepared by BLRB Architects
 - Sumner High School Modernization Interior Floor Plans, dated February 19, 2018, prepared by BLRB Architects
 - Transportation Technical Report, dated February 22, 2018, prepared by Heffron Transportation
 - Sumner High School Modernization Noise Study, dated March 2, 2018, prepared by Ramboll US Corporation
 - Sumner High School Modernization and Elhi Hill Educational Program Light Design Report, dated February 23, 2018, prepared by BCE Engineers
 - Sumner High School Modernization and Elhi Hill Photometric (Lighting) Plans, dated February 12, 2018, prepared by BCE Engineers
 - Project Construction Staging Plan Sheet, dated February 21, 2018, prepared by BLRB Architects
 - Supplemental Environmental Investigation Report, dated November 6, 2017, prepared by Shannon & Wilson, Inc.
 - No Further Action Letter, dated February 28, 2018 and received by Sumner School District, on about March 5, 2018, from Ecology relating to confirmation of remediation under the Voluntary CleanUp Program
 - Letter from Shannon & Wilson, Inc. to Sumner School District, dated March 28, 2018, responsive to Ecology's SEPA comment letter, dated March 22, 2018
18. No cultural/historical resources have been identified on the Project Site. If archaeological materials (e.g. bones, shell, stone tools, beads, ceramics, old bottles, hearths, etc.) or human remains are observed during Project construction, all work in the immediate area should stop. The District will immediately contact the State Department of Archaeology and Historic Preservation, the County planning office, the affected Tribe(s) and the county coroner (if applicable) in order to help assess the situation and determine how to reserve the resource(s). Compliance with all applicable laws pertaining to archaeological resources (RCW 27.53, 27.44 and WAC 25-48) is required.
 19. There are no known environmental contaminants or hazardous situations that will affect the Project.
 20. The existing High School site (1707 Main Street) *has been de-listed* from Ecology's Leaking Underground Storage Tank List (LUST) arising from Ecology's issuance of a No Further Action Letter (NFA), dated February 28, 2018, based upon additional groundwater monitoring performed by the District's environmental consultant (Shannon & Wilson) in August 2017 together with compilation and review of prior soil removal and groundwater monitoring performed in the 1990s, as detailed in a Supplemental Environmental Investigation Report, dated November 16, 2017.
 21. By way of background, three USTs were removed from the courtyard area on the southern side of the existing High School site. This area will house the relocated and expanded Commons/Cafeteria as part of the modernization of the High School. The USTs were removed in December 1992 and February 1993. Soil samples collected at the time of the UST removal were below the cleanup levels. Diesel contamination was detected in groundwater in the excavation area. Four monitoring wells were later placed around the exterior of the school building surrounding the courtyard in approved locations

and diesel was not detected in groundwater collected and analyzed over four quarters of monitoring in the mid-1990s. In August 2017, six borings were placed in the courtyard area to determine if residual soil and groundwater contamination was present in the area where the former USTs had been located. Soil and groundwater samples obtained from those borings did not exceed the current cleanup levels. All monitoring wells were thereafter properly decommissioned. Shannon & Wilson has reported to the District that it is unlikely that any significant quantities of contaminated soil or groundwater (above MTCA clean-up levels) will be encountered during excavation work related to the construction given that the results from the August 2017 investigation were below the cleanup levels and hydrocarbons were not detected. Shannon & Wilson entered the Voluntary Cleanup Program (VCP) and reported to Ecology their findings together with review and analysis of the documentation of the remediation and groundwater monitoring performed in the 1990s.

22. Based upon this documentation and analysis, Ecology issued the NFA which states that:

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site. Verification monitoring demonstrated that cleanup levels are not exceeded at any point of compliance.

Based upon this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Site List and Leaking Underground Storage Tank List.

23. Ecology also references an adjacent site which is listed on Ecology's LUST List, known as Johnson's Chevron, located at 1005 Wood Avenue, Sumner, Washington. In conjunction with acquisition of the two parcels at 1111 Wood Avenue and 1101 Wood Avenue, the parcels on Mason Street (1424, 1428, and 1506 Mason), and the former Multi-Care parcels (1518 Main Street and 914 Meeker Avenue) together with the adjoining parcel located at 908 Meeker Avenue, the District conducted due diligence investigation of all of these parcels which included Phase I Environmental Assessments. The Phase I Environmental Assessments were performed and reported by the same environmental consultant who performed the monitoring and analysis at the High School site in 2017. These Phase I Environmental evaluations and investigations of all of the parcels that comprise the Sumner High School Modernization and Elhi Hill Educational Program Project included review of all relevant Ecology records, including but not limited to the Chevron site. Ecology records document that a petroleum spill occurred at the Chevron site, and contaminated soil was over excavated. The same Ecology records provide details about an UST that was encountered in 2006 during installation of groundwater monitoring wells. The UST was removed in June 2006. Nine monitoring wells were screened from 5 to 20 feet below ground surface (bgs). The building, two gasoline USTs, piping and pumps, a heating oil UST, and hydraulic hoists were removed in early 2007. During groundwater sampling events in 2007 and 2008, concentrations of analyzed constituents were not above cleanup levels. Elevation at the Chevron site was determined to be 100 feet above mean sea level with groundwater at approximately 6 to 7 feet bgs. Groundwater at the Chevron site was also determined to be flowing toward the west-southwest which is away from the Sumner High School properties.
24. The District's environmental consultant (Shannon & Wilson), therefore, has concluded that it unlikely that contaminated soil and groundwater will be encountered during the construction activities associated with the District's modernization of and improvements to Sumner High School (including the recently acquired parcels) given that previous groundwater monitoring has been non-detect *and the groundwater flow on the Chevron site is away from the area where demolition and excavation activities will occur in conjunction with the Sumner High School Project.*

Energy and Natural Resources

25. Electricity and natural gas will be used (and extended as necessary for new improvements) to satisfy energy needs for the Project.

26. The High School Modernization proposal will be constructed consistent with the Washington Sustainable School Protocol which implements high performance standards (RCW ch. 39.35) for public buildings to provide conservation measures to reduce energy consumption and achieve environmental qualities.
27. Measures incorporated into the design of the modernized High School include:
- Two and three-story portions of the building to minimize building footprint
 - Energy efficient HVAC equipment
 - Re-use of current cooler/chiller to serve expanded facilities
 - Energy management system for HVAC system and lighting system controls
 - Daylight responsive lighting controls
 - Lighting system occupancy sensors
 - Low energy LED light fixtures
 - Building system commissioning
 - Enhanced exterior envelope insulation
 - Sun-control insulated glass exterior windows
 - Thermal break exterior window framing systems
 - Other resource conservation features
 - Irrigation system automatic water reduction controls
 - Low flow sinks and toilet fixtures
 - Building-wide waste recycling program
 - Food compost program
28. The District will conduct post-occupancy evaluation of its mechanical systems to determine performance standards and procedures.

Critical Areas/Habitat

29. No state or federal candidate, threatened or endangered plant or animal species or habitat has been identified on the Project Site.
30. There are no wetlands within the Project Site.
31. According to FEMA Flood Map Panel 53053C0353D, the Project Site lies outside of a 100-year flood plain.

Earthwork/Air Quality/Stormwater

32. The topographic relief of the High School site is flat and as such, very little fill will be proposed. Fill material will be imported to fill the area of the existing swimming pool to be demolished as part of the Project. Excavations will be performed in association with utilities, footings, and new hardscapes, including utilities and hardscape for the new parking lot at the Elhi Hill Program. Several stormwater flow control systems will be installed requiring excavation and removal of existing soils. Pavement subgrades will require overexcavation and replacement with structural fill. Grading will be limited to fine grading of pavements and courtyards. Roughly 3,000 cubic yards of earthwork (cut and fill) is expected for the Project.
33. The NRCS Soil Survey classifies the soils at the Project site as Puyallup fine sandy loam. Geotechnical investigations of the existing High School campus show soil conditions consist of sequential layers of

find sand and silty sand in a loose to medium dense condition interspersed with layers of sandy silt, clayey silt, and peat.

34. Geotechnical investigations at the existing High School campus reveal that groundwater is encountered at about three (3) feet below the ground surface and may rise to within one (1) foot of the ground surface during extended periods of wet weather. The High School site has moderate to high susceptibility to liquefaction. Ground improvements will be incorporated into the High School modernization, including, but not limited to stone columns and grout composition.
35. Stormwater will be collected on-site (both proposals and conveyed to on-site flow control systems. Underground storage pipe galleries with control manholes to restrict release rates will be installed. Stormwater will be treated, detained, and released at controlled rates to discharge to the City of Sumner municipal stormwater system. Stormwater quantity control and water quality will conform to the City of Sumner stormwater development requirements and 2012 Washington State Ecology Stormwater Management manual, as amended by the 2014 amendments.
36. Best management practices (BMPs) proposed by the District during construction of the Project, will minimize anticipated erosion. During construction, BMPs will be followed in accordance with the requirements of the 2012 Washington State Department of Ecology Stormwater Management Manual, as amended by the 2014 amendments, for Western Washington, as adopted by the City of the Sumner, to minimize any erosion. To protect soil from the erosion, the following BMPs will be implemented:
 - All disturbed areas that will remain unworked will be stabilized with temporary hydroseed within two days (between October 1 – March 31) or seven days (between April 1 – September 30).
 - All areas that will not be impacted by construction will be seeded.
 - Topsoil stockpiles will be stabilized with plastic coverings.
 - Dust control will be provided by sprinkling the Site with water.
 - Permanent erosion control measures will include site paving and seeding of exposed soils.
37. Construction of the proposed Project would result in temporary increases in emissions related to construction equipment and activities. Because any such emissions would be controlled through implementation of best management practices and be limited in duration, they would be unlikely to result in any significant impacts to air quality.
38. Operation of the modernized High School would result in emissions related to some of the school buses (five smaller buses) and vehicles traveling on-site to school or for drop-off and pick-up of students. The school buses and other vehicles are comprised of gasoline and diesel-fueled vehicles. Upon arrival at the bus load and unload area on Mason Street, the school buses will be required, as an Operating Procedure, to turn off their engines until departure. The potential air quality impacts are expected to be less than significant due to the short travel duration on-site at the High School. School bus service for the Elhi Hill Program will be from the High School as described.
39. The traffic increases due to the Project would result in very minimal increases in delay at study area intersections and that the increase in traffic arising from the Project is not significant. Therefore, potential air quality impacts from increases in off-site traffic are expected to be less than significant.
40. The proposed emergency generator for the High School will be operated for short periods at regular intervals (e.g., once a month for a duration of one hour) to ensure the generator remains in good operating condition. Other than for maintenance, the generator would only be operated during a power outage. An air quality permit would not be required for the generator due to its small size and limited hours of operation.

Landscaping/Fencing/Screening of New Parking Areas

41. Approximately 20,000 sq. ft. of lawn and planting areas around the existing High School building will be removed or altered as part of the modernization.
42. An existing chain link fence along the westerly drive aisle of the North Parking Lot is proposed to be replaced with a solid 6' fence.
43. The Project provides 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 existing parking lot at the Multi-Care building is bounded by a thick hedge of thuja arborvitaes (cypress cedars) which provides a very effective obscuring buffer.
44. A mix of evergreen shrubs, Hogan cedars, and native plantings will be provided at all of the new Parking Lots. Where possible, existing trees will be preserved. New planting areas will be provided in the new Plaza Entry, Tennis Court and PAC entry. The Main Entrance Plaza and frontage along Main Street will have new trees and plantings to complement a streetscape appearance.
45. All landscaping will meet or exceed City Code requirements.

Exterior Lighting

46. BCE Engineers prepared a Lighting Design Report, dated February 23, 2018, together with Photometric Plans which detailed lighting infrastructure and illumination calculations at all of the Project property lines, extending off-site.
47. The new parking lots, plaza areas, walkways/circulation areas, and wall-mounted exterior lighting will be illuminated to provide safety and security for students, staff and visitors. The proposed modernization of the High School will provide exterior LED lighting with full-cut off fixtures on various pole heights particular to the application (building, parking lot, new plaza areas, walkway and circulation areas). New LED lighting will be provided in the new parking lot of the Elhi Hill Educational Program. .
48. All existing parking lighting in existing parking lots on the High School Campus have been retrofitted with LED lighting and motion sensors. All exterior and parking lot lighting are aimed, directional lighting to light only the area necessary to minimize off-site light spillage.
49. There will be no changes to the existing lighting at the former Multi-Care medical building (to be used for the Elhi Hill Educational Program) located at 1518 Main Street.
50. All new parking lighting will also be equipped with motion sensors to dim the lighting to approximately 50% unless motion is detected. All exterior lighting will be controlled by the District's Standard Operating Procedure which requires all exterior lighting to be off during the daylight and off during the weekends unless an activity is occurring. Except for school bus loading and unloading, lighting along Mason Street, exterior lighting will be programmed to be turned on for security purposes about 15 minutes before the first person arrives (approximately about 6:00 a.m.), will be off during the day time, and turned on at dusk but dimmed to at least 50% unless motion is detected and turned off 15 minutes following completion of janitorial service (approximately 11:15 p.m.).
51. Lighting for the Project has been designed in order that there will be no significant, adverse off-site lighting impact in accordance with IES recommendations.

Noise Evaluation

52. Ramboll US Corporation ("Ramboll") prepared a Noise Study, dated March 2, 2018, with a detailed description of the noise-related information and evaluation of the Project. The Noise Study analyzed additional on-site sources of noise, including on-site traffic from school buses, placement of existing cooling equipment, and an emergency generator on the High School Campus.
53. On-site traffic associated with school buses accessing and traveling on-site based upon the trip counts in the school AM arrival (7:00-7:45 am) and the PM departure time periods (2:10-2:30 pm), as determined under the Transportation Technical Report prepared by Heffron Transportation, Inc., was modeled by Ramboll.
54. The chain link fence along the drive aisle along the westerly property line of the North Parking Lot will be replaced with at least a six (6) foot high solid fence to provide noise attenuation.
55. The Noise Study has determined that noise from on-site traffic sources during the school peak hours is expected to comply with the City of Sumner noise limits applicable during the regulatory prescribed daytime hours (7 am to 10 pm).
56. The High School's cooling system will be located in an equipment yard enclosed by a 12-foot high fence on the west, south, and east sides together with a 14-foot high wall on the north side of the equipment yard.
57. The east end of the cooling system equipment yard will have absorbent material affixed to the approximate upper half of the wall.
58. The existing chain-link fence and gate on the west end of the existing cooling system equipment yard will be replaced by a solid door and a solid wall above the door up to 12-feet in height.
59. To achieve occupied temperature no earlier than 60 minutes prior to an occupied time of the High School, the District will only operate the Dry Cooler 60 minutes before the High School is occupied in order to comply with the night time hours (before 7:00 am) when applying the noise limits under the City Code. Ramboll has determined that the model-calculated sound levels of the Dry Cooler operation, with the Project's mechanical yard noise attenuation measures, are 43 dBA or less at all nearby residential properties and would comply with the night time noise limit of 45 dBA.
60. After 7 a.m. both the dry cooler and chiller could operate. Ramboll has determined that the model-calculated sound levels, with the Project's mechanical yard noise attenuation measures, are 48 dBA or less at all nearby residential properties and are substantially lower than the daytime noise limit (under City Code) of 55 dBA.
61. The new emergency generator as part of the High School Modernization Project would be tested and operated occasionally (approximately once a month) for up to an hour to ensure that it remains in good working condition. Testing would be limited to daytime hours only. Noise from emergency operation of the generator is exempt from the noise limits. Noise from testing of the generator is subject to the daytime noise limits under the City Code. Ramboll has determined that model-calculated sound levels from test of the emergency generator together with operation of the cooling equipment are 52 dBA or less at all nearby residential properties and would be under the daytime noise limits as required by the City Code.
62. No significant adverse impacts associated with noise related to the High School Modernization Project are anticipated.

Transportation/Parking

63. Heffron Transportation, Inc., prepared a Transportation Technical Report, dated February 22, 2018.
64. The Transportation Technical Report collected data and conducted a transportation evaluation of the Project 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. The scope of the Transportation Technical Report was coordinated with the City of Sumner.
65. The existing High School site has 11 vehicular access driveways (plus two additional gated curb cuts that generally remain closed (on the east edge (on District property) of the Mason Street cul-de-sac). There are four access driveways along Main Street—the easternmost serves the stadium parking lot, two one-way driveways serve the school-bus loop (entry on the east and exit on the west), and the westernmost access serves the West Parking Lot, west of the High School building. Currently, school buses load and unload within the bus loop; some special education (SPED) buses load/unload along the west side of the building within the West Parking Lot. There is one access driveway on Wood Avenue to serve an existing parking lot on Wood Avenue that will be used in conjunction with the expansion of this lot (the new Wood Avenue Parking Lot). There are three access driveways on Mason Street—one located just east of the tennis courts and two within the cul-de-sac. There are two driveways on Washington Street—the western access is currently gated and remains closed due to portable classrooms in the lot. The eastern access serves the North Parking Lot. Finally, there is one driveway outside of the Project limits located on Valley Avenue which provides access to and from the Stadium.
66. Site improvements associated with renovation and re-use of the former Multi-Care medical building for the Elhi Hill Program would reconfigure access to eliminate the existing northern site driveway on Meeker Avenue. As part of that reconfiguration, a driveway serving the expanded parking lot onto Meeker Avenue would be provided at the approximate location of an existing curb cut that serves one of the existing single-family residences (908 Meeker) to be demolished.
67. The High School modernization component of the Project also proposes to establish a new on-street, curb-side school-bus load/unload zone along the south side of Mason Street (along District-owned frontage) west of the existing cul-de-sac. The District would coordinate with the City on signage for the new school-bus load/unload zone for school-bus-use only on school days during arrival and dismissal periods. It is expected that the curb-side load/unload zone would be available for general parking when not restricted to school-bus-use only.
68. The Transportation Technical Report (“TTR”) determined:
 - 68.1 The net increase of trips generated from the increased student capacity (33 students) proposed with the Project over the existing student population is small. All of the study area 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.

68.2 There would be some change in traffic patterns with student driver and automobile loading and unloading with the opening of new parking lots. With 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 to Mason Street, the temporary busy conditions in the school arrival or departure peak would exist without or with the modernization.

68.3 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 hours.

68.4 In evaluating potential impacts from the Project, the TTR assumed 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 medical building, a higher volume of traffic is associated with medical clinics [ITE Manual] than school high use. If credit was assigned, the result would be a net decrease 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, and therefore, the conclusions under the TTR of Project-related operational impacts are conservatively high estimates.

- 69. Heffron Transportation also 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.
- 70. The Heffron 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 Heffron.
- 71. The District will coordinate with the City with regard to payment, to the extent applicable, of any City Transportation Impact Fee under SMC ch. 12.36.
- 72. The Transportation Technical Report demonstrates that there are no significant, adverse transportation or traffic impacts.

Public Utilities

- 73. At the existing High School campus and the proposed location for the Elhi Hill Educational Program (the former Multi-Care medical building), gas and electricity are currently provided by Puget Sound Energy, water and sanitary sewer services are currently provided by the City of Sumner and data and internet service is provided by CenturyLink.
- 74. Utility services will be extended as may be necessary.
- 75. A portion of the existing overhead utility lines along Main Street of the existing High School campus will be undergrounded along the Main Street frontage of the existing High School campus.
- 76. There are no significant adverse impacts associated with utilities to serve the Project.

Summary

77. The Project will have no significant adverse environmental impacts on fish and wildlife, noise, air quality, transportation, environmental health, or land uses.

MITIGATION CONDITIONS

CITY OF SUMNER MUNICIPAL CODE

1. The District shall obtain a Conditional Use Permit and a Special Exception for Height as a condition of construction of the Project.
2. The District shall construct the Project in accordance with the requirements of the City of Sumner Development and Building Regulations.

LIGHTING

3. All new Project parking lots and exterior wall-mounted lighting shall be installed with full cut-off LED and shall be aimed, directional lighting to light only the area necessary.
4. The Project parking lots and wall-mounted exterior lighting (new and existing) shall operate and shall be controlled by the following District Operating Procedures:
 - 4.1 All exterior lights shall be off during daylight hours.
 - 4.2 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).
 - 4.3 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.
 - 4.4 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).
 - 4.5 On weekends, exterior lighting shall be allowed for School District authorized facility events only. Otherwise exterior lights shall remain off.
 - 4.6 All exterior lights shall be equipped with motion sensors in order to dim lighting to approximately 50% intensity when no motion is detected.

FENCING/LANDSCAPING

5. A six (6) foot sight obscuring wood fence will be installed around the southerly and westerly boundaries of the new Elhi Hill Program parking lot and a mix of landscaping consisting of maples, hogan cedars, shrubs and grasses will be planted to screen the adjacent residential parcels.
6. The thick hedge of thuja arborvitaes (cypress cedars) located at the existing Multi-Care building (new Elhi Hill Program site) shall be maintained, as appropriate, to provide an obscuring buffer.

SOUND ATTENUATION MEASURES

7. The existing chain link fencing along the westerly drive aisle of the North Parking Lot shall be replaced with not less than a six (6) foot solid fencing to provide noise attenuation.

8. The school buses shall turn off their engines during loading and unloading of students (both within the West Parking Lot and on Mason Street).
9. The cooling system equipment on the High School Campus shall be located in an equipment yard enclosed by a 12-foot high wall on the west, south, and east sides and a 14-foot high wall on the north side.
10. The east end of the cooling system equipment yard shall have absorbent material affixed to the approximate upper half of the wall, similar to the existing material and location.
11. The existing chain-link fence and gate on the west end of the existing cooling system equipment yard will be replaced by a solid door and a solid wall above the door up to 12-feet in height.
12. Only the Dry Cooler will operate the 60 minutes before the High School building is occupied.
13. The emergency generator on the High School Campus will be housed in a sound-attenuated enclosure.

ENERGY CONSERVATION MEASURES

14. The modernization of and additional building area on the High School campus shall be constructed consistent with the Washington State Sustainable School Protocol to provide energy conservation measures.

STORMWATER

15. The District shall design its stormwater plans (quantity control and water quality) in accordance with the Department of Ecology's Stormwater Management Manual as adopted by the City of Sumner.
16. Best Management Practices (BMPs) shall be followed during construction of the Project. To protect soil from the erosion, the following BMPs will be implemented:
 - All disturbed areas that will remain unworked will be stabilized with temporary hydroseed within two days (between October 1 – March 31) or seven days (between April 1 –September 30).
 - All areas that will not be impacted by construction will be seeded.
 - Topsoil stockpiles will be stabilized with plastic coverings.
 - Dust control will be provided by sprinkling the Site with water.
 - Permanent erosion control measures will include site paving and seeding of exposed soils.

CONSTRUCTION MANAGEMENT PLAN

17. The District shall prepare a Construction Management Plan (CMP) which shall be incorporated as a contractual obligation of the contractor with the following elements:
 - 17.1 Except as may be otherwise be granted by the City upon request of the District based upon special circumstances, the hours of construction shall comply with City Code (SMC 15.34.010).
 - 17.2 The hours of construction shall be posted on the 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).

- 17.3 Construction material and equipment staging (“Construction Staging Areas”) shall occur on the District parcels identified in the Construction Management Plan (1111 and 1101 Wood Avenue; 1424, 1428, and 1506 Mason Street; and (portion) North Parking Lot), and such other locations within the existing High School campus as necessary for construction purposes.
- 17.4 All Construction Staging Areas shall be fenced and secured with gates and locks.
- 17.5 The West Parking Lot and the existing portion of the Wood Avenue Parking Lot shall remain open and available for parking.
- 17.6 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.
- 17.7 To the extent possible, all vehicles, trucks, and equipment shall be turned off when not in use.
- 17.8 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.
- 17.9 All local construction truck deliveries to the District Property shall follow the shortest route reasonably possible consistent with SMC ch. 12. 30.
- 17.10 Truck movements (deliveries and earthwork transport), to the extent reasonably possible, shall not occur during morning arrival and afternoon dismissal of the High School.
- 17.11 Construction traffic shall be separated from school bus loading and unloading.
- 17.12 Wheel wash stations shall be installed at appropriate access locations.
- 17.13 City streets shall be swept or cleaned as may be necessary.
- 17.14 Appropriate areas shall be identified for construction staff parking.
- 17.15 Construction phasing shall include converting the area of the Wood Avenue Parking Lot into a surface parking lot in an early phase of construction.
- 17.16 The Elhi Hill Parking Lot shall be prepared for a surface parking lot in an early phase of the construction.
- 17.17 The District and the contractor shall meet with the City to review the CMP prior to the commencement of construction.

MISCELLANEOUS

- 18. As authorized under RCW 82.02.020, the District shall enter into a Voluntary Agreement relating to certain frontage improvements reasonably related to the Project to provide for the construction of certain frontage improvements related to the Project (“Frontage Improvement Work”) in accordance with the current City of Sumner Development Specifications and Standard Details, dated October 2016.

- 18.1 The District shall coordinate with the City, in conjunction with Puget Sound Energy, the electrical service provider, to provide illumination along the existing High School Main Street frontage, Valley Avenue frontage, Wood Avenue frontage, Mason Street frontage, Meeker Avenue frontage, and Washington Street frontage, consistent with the City's existing ornamental design, style, and specifications, including spacing, for lighting poles.
- 18.2 The District shall coordinate with the City to review the City's ADA study to determine appropriate locations to meet and be brought up to current ADA compliance standards. It is understood that the area of concentration will be an accessible route running along street frontage sidewalks, driveway crossings, and curb ramps.
- 18.3 The District, in coordination with the City, shall make such crosswalk improvements from the curb to back of sidewalk only, as necessary, to comply with current ADA standards at the following locations:
- (i) at the intersection of Main Street and Meade Avenue (the north-south crosswalk on Main and Meade, and the east-west crosswalk on Meade extending westerly);
 - (ii) at the intersection of Main Street and Meeker Avenue (the north-south crosswalk on Main and Meeker, and the east-west crosswalk on Meeker extending easterly);
 - (iii) at the intersection of Main Street and Bonney Avenue (the easterly crosswalk on Main and Bonney, and the east-west crosswalk on Bonney Avenue extending easterly across Bonney) provided, however, the existing westerly crosswalk at the intersection of Main and Bonney shall be eliminated);
 - (iv) at the intersection of Main Street and Lewis Avenue (the north-south crosswalk on Main and Lewis, and the east-west crosswalk on Lewis extending easterly across Lewis);
 - (v) at approximately the mid-point of Valley Avenue between Main Street and Washington Street (the east-west crosswalk on Valley located easterly of the offices of the District's Athletic Director to the point of connection with the easterly side of Valley, south of the entrance to Fred Meyer);
 - (vii) at the intersection of Valley Avenue and Washington Street (the westerly north-south crosswalk on Washington only);
 - (viii) at the intersection of Mason Street and Wood Avenue (the north-south crosswalk on Mason Street and the east-west crosswalk on Wood Avenue extending westerly across Wood); and
 - (ix) at the intersection of Wood Avenue and North Street (the north-south crosswalk on North Street and the east-west crosswalk on Wood Avenue extending westerly across Wood).
- 18.4 To the extent existing driveway approaches are removed on certain District Parcels, concrete curb and gutter shall be extended across the footprint of the removed driveway area together with an appropriate planting strip for continuity of landscaping.

- 18.5 Additional street trees within the City's right-of-way area along the limits of the Project Area shall be included with such frontage improvements at a spacing, caliper and species as required by current City standards.
- 18.6 The District shall use its best efforts to substantially complete all of the Frontage Improvement Work prior to issuance of a Final Certificate of Occupancy of the Project; provided, however, the District shall have the right to bond any remaining items of the Frontage Improvement Work in order to obtain a Final Certificate of Occupancy for the Project.
19. In the event that any of the following conditions occur following completion of the Project: (i) the total High School student population, inclusive of the Elhi Hill Educational Program, increases in excess of 1,830 students, (ii) the total Staff population of the High School, inclusive of the Elhi Hill Educational Program, increases in excess of 150 individuals, or (iii) the square footage building area related to the High School, inclusive of the Elhi Hill Educational Program, increases, which shall include portable temporary classrooms, compliance as required under SMC ch. 12.36, the City's Transportation Impact Fee, as may be amended, is required.
20. In the unlikely event that contamination is encountered during excavation associated with the Project, the District shall be required to notify the Washington State Department of Ecology.

NOTE: The issuance of this Mitigated Determination of Nonsignificance does not constitute project approval. The Sumner School District No. 320 will comply with all other applicable requirements, including City of Sumner Building Permit, Demolition Permits, Site Development Permit, Electrical, Plumbing, and Mechanical Permits, and Construction Stormwater General Permit requirements under the Washington State Department of Ecology regulations.

NOTE: Pursuant to RCW 43.21C.075, the final decision of the Responsible Official may be appealed. In accordance with Sumner School District SEPA Regulations & Procedures No. 6890P(10), the District will issue a Notice of Action pursuant to RCW 43.21C.080 with the applicable appeal period.