



## Planning and Community Development Department

210 Lottie Street, Bellingham, WA 98225

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### REQUEST FOR INFORMATION

USE2023-0027, DR2023-0033, and SEP2023-0039

**Date of Notice:** December 6, 2023

**Date of Notice of Complete Application:** 12/4/2023

**Project Location:** 3000 Northwest AVE. Columbia Neighborhood, Area 2, Zoned Neighborhood Commercial.

**Applicant:** Daniel Lawrence, Zervas Architects, 209 Prospect St, Bellingham WA 98225

**Property Owner:** Franklin Academy, 3000 Northwest AVE, Bellingham WA 98225

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The Planning and Community Development Department (PCDD) has reviewed the application(s) referenced above. It has been determined that these application(s) do not supply sufficient information to prepare a SEPA threshold determination and permit decision, compliant with applicable regulations of the Bellingham Municipal Code (BMC) and Comprehensive Plan.

#### **Required Actions:**

To continue review of the above application(s), please submit the following information electronically to the permit center ([permits@cob.org](mailto:permits@cob.org)) and the staff planner listed below.

1. **ACTION ITEM:** As required in the Pre-application Conference Notes, provide a traffic memo prepared by a transportation engineer analyzing the impacts of the proposed school expansion on nearby traffic volumes/circulation.

Traffic memo forthcoming. Per conversation with Sara Ullman.

2. **ACTION ITEM:** Please provide additional explanation about pick-up and drop-off activities to evaluate CUP Criterion 5 in BMC 20.16.010(E) (#13 on the Conditional Use Permit Application). Specially, please confirm whether the existing CUP condition #2 of HE-07-PL-029 will be met, which states, *“Condition No. 3 of the September 2002 Order is modified as follows: Client contracts shall include a provision prohibiting on-street drop-offs/pick-ups and on-street student parking. Staff and students who drive vehicles to the school shall be issued parking permits to park on-site. Staggered start and release times shall be implemented to minimize a.m. and p.m. peak traffic congestion and conflict with Bellingham Public School bus pick-up and drop-off. A traffic manager shall be employed to manage morning and afternoon pick-up and drop-off and ensure*

*compliance with the traffic restrictions imposed in this Order and the September 2002 Order, including, but not limited to, closure of the northerly Walnut Street gate during drop-off and pick-up times.”*

Current CUP conforming drop off and pick up flow will not change with the proposed project. The school uses staggered drop-off and pick-up times. At Robin Hall they start at 2:30 with our first preschool class and release students every 5 minutes until 1st grade at 2:55. The second graders currently are released at 3:00 from the other building. With the completion of the proposed project, they will be released from Robin Hall at 3:00 instead.

The relocated fence at the northern corner of the property along Northwest Ave. will be gated and will not impact traffic flow. It will be used in a similar manner to the existing, to prevent use of the back parking lot after hours.

Students at the new addition are also not representative of an increased student population, as the new addition is housing current students displaced within the existing facility. There will be no additional increase in traffic flow as these students are currently already being picked up, they are just merely moving classroom location.

3. **ACTION ITEM:** Revise the parking lot restriping to comply with parking dimensions in BMC 20.08.020. Diagonal parking needs to be a minimum 8.5' wide, the plans show only 7' wide stalls. Please revise parking calculations if fewer stalls are to be provided.

The proposed improvements do not include adjusting or relocating any of the existing parking stalls. The pavement marking may be repainted, but no additional alterations will be made. The proposed parking stalls will meet the parking stall dimensions required in BMC 20.08.020.

4. **ACTION ITEM:** The parking lot expansion triggers compliance with applicable parking lot landscaping requirements. The diagonal parking area along the northern property line needs to provide landscape beds at the heads of the stalls per BMC 20.12.030(C)(4).

Please identify these landscape areas on the landscape plan. Drought tolerant species and soil amendments will be needed considering the location and direct sunlight.

The existing parking stalls along the northern property line are not proposed to be altered with the development. The stalls are currently placed adjacent to the existing building to the north with limited space between the wheel stop and the edge of the building. In order to install landscape beds at the heads of the stalls, the existing asphalt would need to be sawcut and removed. As noted by the City of Bellingham, the parking stalls may be sawcut at an angle to create triangular planting beds in front of the parking stalls. However, the triangular landscape does not provide many advantages because of the proximity of the adjacent building. The small area where the landscape strip and triangles would be installed does not provide good sunlight exposure, generates excess heat from the building walls, and does not support plant survival. Additional landscaping has been proposed throughout the site in areas that are more conducive to the plant survival and enhance overall site appeal. Therefore, the site landscape will account for the landscape not being installed adjacent to the existing stalls and will still exceed onsite landscape requirements.

5. **ACTION ITEM:** Please explain how parking for events will be handled. Will someone be directing traffic and/or putting cones out to ensure orderly parking?

The playground area and additional spaces in the north staff parking lot are used as overflow parking for events. The playground has two gates at the north and south ends so that cars can park and exit and staff directs cars to ensure the area is efficiently parked. This area is used for drop-off in the morning so parents are used to this practice. For larger events the neighboring commercial areas of the Salvation Army or the shopping are asked for permission to park in their lots.

6. **ACTION ITEM:** Please clarify in the site plan what the demolished walls will be replaced with. If additional parking or landscaping is proposed, please identify this on the plans.

Site walls are to be removed but the existing landscaping will be preserved and cleaned up to the extent that is possible. No additional parking proposed in these locations. See additional notes on plan.

7. **NOTE:** The Stormwater Letter does not correctly calculate new/replaced hard surface for the project. A Stormwater Report with accurate calculations will be required with the building permit.

Noted. Updated hard surface totals will be included with the building permit.

8. **ACTION ITEM:** Application materials need to provide a cost estimate for the project to determine if landscaping requirements will be triggered. Per BMC 20.12.030(B)(1), "All new construction and remodeling of same when the cost of remodeling exceeds 50 percent of the assessed valuation of the structure to the extent that there is space available for landscaping shall follow the applicable landscaping requirements provided in BMC 20.12.030." Per [Whatcom County Assessor's Information](#), the 2022 assessed valuation of improvements on the property was \$1,421,947.

Project value will be more than 50% of this stated value. Requirement for perimeter trees is already met by existing perimeter trees on site (8 Req. 16 Existing). Existing landscape area exceeds what is required and new design proposes to increase this area and further refine it. Please see Landscape area exhibit

9. **ACTION ITEM:** Though calculations were not provided for ground floor glazing, it appears a departure request will be needed from BMC 20.25.090(B)(7)(c) which requires, "A minimum of 60 percent of the building wall facing a public street, park, trail or plaza be transparent at a height between two feet and seven feet above grade." Please prepare a departure request with justification for either BMC 20.25.090(A)(1) or (2). Considering the unique programming needs of a school and the street activation achieved with the proposed playground, staff would be supportive of such a departure.

Proposed design has 47% glazing between 2-7ft on Northwest Ave. facade

Departure request:

The proposed design aims to balance several concerns while taking into consideration the intent of the design standard. Safety and creating a healthy learning environment are paramount to our design. Though the design doesn't meet 60% glazing requested, effort has been made to fully glaze the south corner of the addition to engage with the public areas. Large windows in the classrooms further open up the façade while keeping an optimal learning environment in mind. The design further engages with the ROW with a lively outdoor area along the frontage, coupled with a landscape buffer at the proposed fence line. We believe that this design meets the intent of the standard, enhances the livability and character of the neighborhood and adjoining open space and will have no detrimental impact on the nearby property, neighborhood or city.

10. **ACTION ITEM:** Please revise the site plan to identify required bike parking. Per BMC 20.12.010(E)(10), all parking facilities with more than 50 parking spaces shall provide a bicycle storage area in which to temporarily store bicycles. Bicycle storage space shall consist of a conveniently located and sturdy rack, hooks, bar, or locker permitting locking or enclosure of the bicycle frame and both wheels to prevent thefts. Apart from hanging hooks, bicycle storage facilities shall be designed so as not to support the full weight of the bicycle on one or both wheels. The bicycle storage area shall have the capabilities to hold 10 percent of the number of required parking spaces.

Please see noted bike racks on site plan

11. **ACTION ITEM:** Per the Land Clearing Ordinance, BMC 16.60, a tree retention plan for the entire property is required. The plan must identify all existing trees, their size, and their species. Show which trees are proposed to be retained and which trees are proposed to be removed. Additionally, provide a Narrative demonstrating why any trees need to be removed. For example, the plans show removal of the large 30" oak tree. Were design alternatives explored to retain the tree? Why has the proposed building addition location and size been chosen and what constraints or operational needs resulted in this design? Please explain.

Regarding the 30" Oak Tree, this tree has been identified by Franklin Academy as a safety concern. The tree has currently heaved the existing asphalt parking lot along Northwest more than 12" in height, impeding parking and the surface condition of the parking lot and adjacent sidewalks. This tree has limited parking since staff and visitors avoid these parking stalls due to the unlevel surface, tree limb debris, and sap. When looking at viable options for expanding Franklin Academy to provide the square footage needed, the best solution was fronting Northwest Avenue, as not to reduce parking or impede the pickup/drop off route. An addition along the north, east, or south would eliminate parking and push vehicular routes onto neighboring streets. With the amount of existing perimeter street trees and retained landscape, the cluster of large oak trees to the south approaching the school along northwest, asphalt heaving issues, and much needed additional classroom space, we feel our current design proposal is the best option. The required program to accommodate current needs at the school equates to the proposed footprint. Removing the tree is essential to providing the area for these academic needs as well as improving the existing parking lot, drive lane, and adjacent sidewalk.

As proposed, the removed tree will be used on site per landscape plan.

12. **ACTION ITEM:** Please revise the parking data table to reflect that assembly area parking and school parking may share in accordance with BMC 20.12.010(B). Please provide a breakdown of provided parking to identify the number of stalls in the playground area that will only be used for events.

Please see revised parking calculations on Site Plan sheet A1.01

13. **ACTION ITEM:** Please identify the location of mechanical equipment on the site plan, landscape plan, and building elevations.

No site mechanical proposed. See updated roof plan and elevations for location.

14. **ACTION ITEM:** Please explore moving street trees to the street side of the fence while being mindful of overhead powerlines. Landscaping should be installed to buffer the fence from the sidewalk and provide security and separation for the courtyard.

We considered placing trees to the street side but decided against it due to the site conditions. We concluded that locating them within the fence would be the best location to give the trees more root space and reduce interaction with above and below ground utilities, primarily the overhead powerlines. The proposed landscaping plan shows planting on both sides of the fence for screening. Our idea is a partial screen to obscure the view in, but not block it completely. CPTED principals instruct us to not completely block the view in to prevent unwanted uses inside the fence as much as prevent viewing of approved activities from the outside.

We believe that this approach is the best solution to achieve the City's expressed goals of softening and screening the fence, while also allowing for a better growing environment for trees to screen the building facade.

Review of these application(s) cannot continue until this information is received and determined to be sufficient. Within 14 days of submitting the above information, the City will either determine that the information is sufficient or specify in writing what additional information is required. If the information is sufficient, processing of the application(s) will resume in accordance with BMC 21.10. This request for additional information is accordance with BMC 21.10.190 B. (4).

Pursuant to BMC 21.10.190 (C), the application(s) will expire and become null and void if all of the requested information is not submitted within 120 days from the date of this notice for request for information. At the applicant's request, the PCDD director may extend this 120-day period in accordance with BMC [21.10.080\(A\)](#). No further notice will be sent concerning this 120day expiration timeline.

Please contact the staff member below if you have any questions regarding this notice:

Name: Sara Ullman, Planner      E-mail / Phone: [scullman@cob.org](mailto:scullman@cob.org) or 360-778-8366