



THE COUNCIL OF EDUCATIONAL FACILITY PLANNERS INTERNATIONAL

May 1, 2013

City of Olympia Planning Commission
City of Olympia
P.O. Box 1967
Olympia, WA 98507-1967

RE: School Building Projects under the Unified Development Code

Dear Planning Commission:

First, let us describe our organization. CEFPI is a worldwide professional non-profit association whose sole mission is improving the places where children learn. CEFPI is comprised of a variety of professionals who are actively involved in the various phases of school planning. CEFPI members are architects, planners, engineers, landscape architects, K- 12 administrators, higher education professors, construction management firms, facility maintenance and operations professionals, consultants, manufacturers, suppliers, and state and local agency representatives. Washington Chapter of CEFPI is the most active educational facility planning organization in our state, with 293 members and many more participants.

As planners of school building projects, mostly K-12 public schools, we are keenly aware of the particular requirements and needs of this project type. Schools have a unique position in their community. They exist for the common good and are occupied by the children of the citizens. If they can be structured to provide safety, operational efficiency and the best possible learning environment, the entire community will benefit. Their operation and occupant population are distinctly different from other buildings that are typically governed by commercial building regulations. We understand that a provision in Olympia's Unified Development Code states: "Place commercial buildings on the street edge and locate parking on the side or behind the building." This is a good idea for buildings which are commercial in the literal sense, which are used for commerce. It also works well for mixed residential/commercial developments and helps to avoid the strip-mall look that is typical of urban sprawl.

However, this commercial development code is ill-suited to school buildings for the following reasons:

Washington Chapter
c/o Philip Riedel, NACIArchitecture • 2025 First Ave, 3rd Floor • Seattle, WA 98121
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### Learning

The primary function of a school building is to support learning, which is a significant community benefit. By appropriately designing space between the school and the street, we can mitigate disruptive street noise and distraction to provide the best possible learning environment. This design approach is consistent with current best practices for acoustics, daylighting, ventilation and operable windows.

### Safety

The character and population of school traffic is quite different from general commercial and requires different design solutions. A school's front side and back side are completely different from a commercial building. The front needs to accommodate public entry, drop off and general student entry.

Schools have significant site program requirements in addition to parking and landscaping, such as playgrounds, play shed, ball fields, outdoor learning areas, etc. In addition, there are two types of vehicular access and parking required: bus loading/drop-off and parent car loading/drop-off. Both types of loading and drop-off occur at the same time, so to maintain child safety the two types of vehicles must be kept separated. Children should not have to cross drives or parking to get from the school building to the playgrounds and playfields. The back needs to accommodate safe access to all the athletic fields, outdoor play areas and outdoor learning. The back is where foot traffic, safe pedestrian circulation should occur and be the dominant function. Shepherding kindergarten students through a parking lot to get to their play area is inappropriate and a public safety issue.

So, a typical school site design will have a bus drive loop on the side of the building, playfields behind the building and public entry, parent parking and drop-off in front of the building.

### Community Connections

A school's front entry is its most important exterior civic space. It needs to have more space devoted to it than a standard commercial building. The front entry needs to be visible to the community, not hidden away on a back side. The front entry is an important gathering area for a school, for a school's community, and for its teachers, parents and students to gather informally and formally. These are also important spaces where informal teacher-parent and parent-parent interactions can occur, interactions that build critical relationships between parents and their children's schools. These spaces can only happen where the coming and going of parents dropping their students off and picking them up, or walking them in, can occur.

As an icon of the community and a place of welcome paid for by tax payer dollars (unlike other commercial properties), the front entrance to a 60-, 150- 200,000+ SF multipurpose facility is an important aspect of creating a sense of place that is safe and inviting. Way finding to and through a school is an important aspect of safety. As such, having an entrance facing the street with proper buffers to allow for the different modes of commuting to the site (busses, student drop off, walking/biking), tailored to the demographic of the primary user of the site (the student ranging from 4-18 years of age) are also drastically different than the typical commercial site targeted towards more workforce age patrons.

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### Security

As you know, security needs in school design have become highlighted this past year. There is a distinct advantage to locating parking in front of the building, so it is highly visible to the administration and front office staff. This is a common strategy in school design. CPTED (Crime Prevention Through Environmental Design) principles support good natural surveillance. This facilitates control of entry through a common front door during school hours. High-tech surveillance systems have limits to their effectiveness and it is important to avoid visual barriers for direct supervision of approaching entrants.

### Public Use

This is a public facility open to community use. In a typical school all doors except the front are locked between about 9:15 and 2:45, requiring the public to enter through the front door. Visitor parking is needed near this main entrance. True to the civic function of a school building, it is important that this main entrance be toward the street. If the main entrance and administrative offices are reoriented to the side or back of a school building, it does not project an inviting image to the community.

### Essential Public Service

Schools are required public facilities which can be compared to Fire Stations or Police Facilities. They are not-for-profit and do provide a public service. They have specific design criteria as mentioned that cannot conform easily to a generic commercial building code without compromising safety, circulation and acoustic thresholds. As an example, a good design for a fire station would not place it up against a street or require the fire trucks to access the station from the rear. Like schools, such facilities are specific to their use and need to be considered an exception to the norm.

### Site Restrictions

When planning a school, often the District is working with a donated piece of land, or owns a piece of land that they must work with. Placement of the building and meeting all of the specific site requirements as listed here can be complicated. Adding restrictive commercial requirements on building siting in these situations can lead to compromises in function and safety.

### Accessibility

Given the main entrance on the street side of the school building, it is unfair to make handicapped persons navigate around the school to the entrance. Accessible parking is required near the front door.

### Intent

We note that the referenced items in the code are provisions and the Director has broad latitude in interpreting the code, in keeping with the spirit and intent of the code and the Comprehensive Plan. The purpose of the code is stated under 18.02.040: "It is the purpose of this Development Code to promote the health, safety and general welfare by guiding the development of the city consistent with the comprehensive plan which is, in part, carried out by the provisions of this title." School Districts have a different mission than commercial developers and school buildings have unique needs which do not apply to other types of development. By allowing schools to realize these needs, you will be promoting health, safety and general welfare.

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We hope you will consider exempting public school projects from the requirement to place commercial buildings on the street edge and locate parking on the side or behind the building.

Thank you,

CEFPI Washington Chapter Board of Directors:

*Philip Riedel, Chapter President*  
NAC|Architecture

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**From:** Nathaniel Jones <njones@ci.olympia.wa.us>  
**Subject:** Olympia Regional Learning Academy - OSD request for text amendment to consider parking code changes  
**Date:** March 31, 2013 8:46:23 PM PDT  
**To:** "jerome.parker@comcast.net" <jerome.parker@comcast.net>  
**Cc:** Keith Stahley <kstahley@ci.olympia.wa.us>

Jerry,

As I see it, the issue before the city involves a conflict between Crime Prevention through Environmental Design (CPTED) and two linked values related to 1) alternative transportation and walkability and 2) an aesthetic which rejects a streetscape dominated by pavement and parking lots.

CPTED has been an important design element for many years and rightfully so. In the case of ORLA, OSD would like to operate the site with a single public entrance to the building. The current design places the building behind the 117 stall parking lot, prompting all students and visitors to enter the building at a single point. This security strategy is well tested, allowing staff to observe the parking lot and approaching visitors before they reach the building.

From a walkability perspective the proposed design raises concerns. Alternative transportation objectives direct that Olympia should locate the school entrance with a clear, unobstructed path for walkers and bicyclists, while providing strong walking and biking connections to the school site from adjacent streets and neighborhoods. As proposed the building entry is at least 200' from the nearest public sidewalk, transit stop or bike path.

This design introduces a significant safety concern. Because the building is far from the road and set away from the neighborhood, kids are expected to walk through the parking lot. The design addresses this with parking lot pavement markings which have students negotiating their route between moving vehicles. Alternative routes direct students around the periphery of the lot, immediately adjacent to the bus lane. As proposed, the design creates multiple conflict points between vehicles and pedestrians and bicyclists.

The visual impact of the design is an opportunity lost. Apparently the District acknowledges the undesirable character of a street frontage parking lot. They explain that this was why they chose to front the lot on Dayton Avenue, the side street, rather than Boulevard Road. The design shows a buffer of vegetation intended to hide the unattractive parking lot. Screening the parking lot may help the visual impact for passing motorists but it does not consider how the local community will relate to the withdrawn facility. This public building has the opportunity to play a more positive role in defining the neighborhood.

I suggest that the supposed conflict between CPTED principals and this suite of transportation and aesthetic considerations is overstated. I suggest that all these considerations can be achieved through creative approaches to the building operation – approaches that would impact site design.

The current design reflects the idea that there can only be one building entrance for visitors. And that this entrance is best located where it can provide surveillance of the parking lot and anyone who may be approaching the building. This is one reason why schools' administrative offices are generally located adjacent to a main building entrance. Placing the parking behind the building will likely require two entrances, one for bus riders and parkers and one near the street, for everyone else. Although I do not know the specifics of ORLA's operations, it seems entirely possible that the administrative offices could be placed at the entrance with the most activity and that a second office function, such as a teacher preparation room, could be placed

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at the secondary entrance. Further, it appears that there is no solid reason why the architects could not place offices directly adjacent to these two entries, each protruding into the hallway and to the outside of the school. Visitors who approach the entry are easily seen and staff has good visibility outside to the entry area and down the hallway.

It is unfortunate that OSD progressed so far with this design proposal knowing that it would require a change to the City Code. It appears to me that unwarranted assumptions have been made. Here is the Code language:

18.38.200 Parking facility location

A. ...

B. Where possible, surface parking lots shall be located behind a building. Where it is not possible to provide parking behind a building, parking lots may be located along the side of a building, provided that it comprises no more than fifty (50) percent of the site's street frontage. This provision does not apply to commercial parking lots which comprise the only use of a site.

The approval authority may waive these requirements if the applicant demonstrates that these parking restrictions would not allow reasonable use of the site due to its configuration (e.g., if the site has multiple street frontages and it is impractical to meet this requirement along all frontages due to the amount or relationship of the proposed development) or other physical site constraints, or it would significantly interfere with pedestrian circulation.

Surely in this case, the site configuration, constraints or pedestrian access are not making it impossible for reasonable use of the site as a school facility with parking in the rear. By locking in on the idea that the building may only have one entrance and that entrance must be set behind the parking lot, OSD has knowingly ignored the City's rules and has brought forth a design which needlessly exposes students to vehicle conflict within the parking lot.

Depending upon the final design, it appears likely that OSD will need to provide pedestrian refuge islands in Boulevard Road at 12<sup>th</sup> and 16<sup>th</sup> Avenues.

I welcome your comments and questions.

Nathaniel Jones,  
Olympia Mayor Pro Tem

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