



COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

July 21, 2020

Washington State Department of Social and Health Services (DSHS)
Assistant Director Capital Projects
Attn: Robert Hubenthal
1115 Washington Street SE
Olympia, WA 98504

SENT VIA EMAIL TO: Robert Hubenthal (hubenbj@dshs.wa.gov)

RE: LU20-00027 Western State Hospital Master Facilities Plan and LU20-00030 Western State Hospital SEPA Checklist

[Site address: 9601 Steilacoom Blvd SW (APN#0220283026; -027; 0220031007; 0220321022)]

Mr. Hubenthal,

The City of Lakewood appreciates the opportunity to process the Western State Hospital (WSH) Master Facilities Plan ("Plan") (LU-20-00027) and SEPA checklist (LU-20-00030). Both applications were deemed complete on May 26th and underwent a 30-day public notice period from June 10-July 10, 2020. During the public comment period, the City received 20 public comments and 10 agency comments, as well as, 54 comments via social media. In addition, the Community and Economic Development Department completed a thorough review of the proposal. The end result of this review is this document, a correction letter containing four sections:

- 1: A review of the public facilities master plan code;
- 2: Corrections and questions based on the submitted documents;
- 3: Summary of public and agency comments; and
- 4: Resubmission requirements.

Relevant staff contact information is included in each sub-section. The City encourages a follow-up meeting between Western State Hospital and City staff to discuss the contents of this letter.

Section I: Public Facilities Master Plan & Conditional Use Permit¹:
Contact- Courtney Brunell (253) 983-7839

The WSH Public Master Facilities Plan serves multiple purposes. First, it fulfills the City's statutory requirement found in RCW 36.70A.200, which requires cities to include in their

¹ Relevant Code sections: LMC 18A.20.080, 18A.30.110-210 and 18A.40.060

Comprehensive Plan a process for identifying and siting essential public facilities. Additionally, it is meant to ensure consistency with local land use regulations, compatibility with surrounding land uses, and propose impact mitigation.

Public Master Facility Plans are reviewed by the City as a process III permit under the Lakewood Municipal Code (LMC) 18A.20.080, and is required to meet both the conditional use permit criteria and permit review criteria outlined in LMC 18A.40.060(B)(2).² In the past, the City has not required separate applications for a conditional use permit and master facilities plan; rather, the City has required that the conditional use permit review criteria be met and that the code section pertaining to conditional use permits, LMC 18A.30.110-210, also be used to process Public Facilities Master Plans. This process has worked well in the processing of other master plans including Pierce Transit, Pierce College, and Clover Park Technical College.

The process for amending the WSH Master Facilities Plan is the same as what is required to amend a conditional use permit. As mentioned previously, all master plans are conditional use permits and are required to meet the same criteria³. Minor modifications are allowed to a conditional use permit via administrative review and approval as outlined in LMC 18A.30.150. To summarize, minor modifications may not change: the number of dwelling units or square footage (unless deemed de minimis by the City); height of structures; or relocate a building, parking area, street or other use or built feature.

Essentially, changes which involve the location of structures or size of structures, require additional review by the Hearing Examiner. In order to evaluate future buildings under a master plan proposal, these items need to be clearly defined, so the City is able to determine if they acceptable within the parameters of the approved Facilities Master Plan and Conditional Use permit, or warrant additional review.

The current submittal for the WSH Public Facilities Master Plan identifies seven (7) new structures. The site plan, *Figure 1: Campus Framework, Developed areas*, illustrates general locations for each structure, and *Table 7*, found on page 27, estimates square footage of each structure. Beginning on page 25 is a narrative describing the new facilities, and *Table 6*, which includes the maximum heights and minimum setbacks for new construction.

Figure 7 is in essence a “bubble diagram” and is used for the purposes of space planning and organization at the preliminary phase of the design process. DSHS/WSH have provided estimates for the various building sizes, locations, heights, setbacks and total patient counts. While Figure 7 is providing the applicant flexibility in the master planning process, it has limitations. Figure 7 lacks sufficient detail to be regarded as a master plan document.

The City regards the current WSH Plan as conceptual, with limited design details provided for each new building, and an unknown future patient count, which makes it difficult for the City and the Hearing Examiner to assess compatibility. The City is requiring DSHS/WSH to provide specific information on building locations, building heights, setback, square footages and patient counts for each new building prior to moving the application forward. By way of information, when other state agencies have been required to prepare master plans, detailed information has been provided. Therefore, this request for additional information is not deemed out-of-the-ordinary.

² Mental health essential public facilities are also subject to LMC 18A.40.060 (B) (4) through 18A.40.060 (B) (11).

³ LMC 18A.40.060.B.2 and LMC 18A.20.080.

Section II Submittal Document Corrections and Requests for Clarification:

This section includes a list of questions and comments from the City. When possible the individual questions have been broken down by document title and page number.

PUBLIC FACILITIES MASTER PLAN received June 11, 2020.

Contact: Courtney Brunell, 253-983-7839

Page iii, Table 1

1. Under the category, Civil Commitment, for Buildings 17, 18, 19, 20, 21, 27, & 29, why is the existing 2019 count missing? Is the "500" number in the wrong column? Please clarify.
2. The total number of civil commitment beds is off by 1.
3. What happens to the civil commitment buildings after 10 years?
 - Of the Civil Commitment Buildings, Buildings 17, 18, 19, 20, 21, 27, & 29, only 21 and 27 are to be demolished.
 - Of the buildings that remain, what will they be used for?
 - What are the options DSHS/WSH have considered for the totals listed as "TBD"? Does DSHS/WSH intend to use these beds, and if so, for what purpose?
4. Is Building 29 a civil commitment building or a forensic building? Under the category "Bed Types" it is described as both.
5. WSH has 360 existing forensic beds in four buildings. Under the category of "In Development," WSH states they have 458. The difference is 98 beds (458 – 360) which accounts for current projects. WSH is in effect adding 98 beds prior to approval of the MP.

However, beginning in Year 6, or thereabouts, WSH proposes to reduce beds to 183 (loss of 275 beds), and after 10 years, the total number of forensic beds in Buildings 21, 27, 28, & 29 is "to be determined."

During the master planning time period, why would DSHS/WSH create 98 new forensic beds within a 5-year period, and then by year 10 not use them? Again, the term, to be determined, is confusing.

Does DSHS/WSH plan to continue to use these beds, and if so, for what purpose? Does DSHS/WSH propose to demolish Buildings 21, 27, 28 & 29?

6. Under the master planning Mid Term period, the total is incorrect. The number is not 817; the correct number is 799.

Page 3:

1. Please provide a map showing the structures listed as primary, secondary, and the structures listed as secondary to be demolished. (See Figure 11.)

Page 5:

1. Address how the adopted Lakewood Comprehensive Plan policies have been satisfied: GOAL LU-40 and Policies LU-40.1, LU-40.2, and LU-40.3. (Excerpts of these policies are found below).

GOAL LU-40:

Recognize the unique nature of federal patent lands at Western State Hospital and Fort Steilacoom Golf Course.

"Policies:

LU-40.1: Work with DSHS to update the Western State Hospital Campus Master Plan.

LU-40.2: Enforce the City's public facilities master plan process conforming that: 1) appropriate provisions are made for infrastructure and/or services; 2) approval criteria and mitigation measures are incorporated into project approvals; and 3) the safety of the general public, as well as workers at, and visitors to, Western State Hospital is ensured.

LU-40.3: Avoid as much as possible incompatible uses on the WSH campus which could adversely impact existing uses, adjoining properties, or adversely impact at-risk or special needs populations, including but not limited to children and the physically or mentally disabled.

Page 8:

1. Please provide any updated information regarding the referenced studies of a revised care model for civil commitment patients.
2. From the document, it would appear that if the community treatment facility (also known as residential treatment facility) were constructed at WSH, it would be used for civil commitments: please confirm.
3. Does DSHS propose to place WSH civil commitments in Adult Family Homes (AFHs)? If so, does DSHS have an approximate number?

Page 12:

1. There are two boundaries shown on Figure 9. One boundary is green; the other boundary is white. The two boundaries are found in the vicinity of the baseball diamond. Which boundary is the correct boundary?

Page 17:

1. Under Table 4, the number of beds does not add up with Table 1 found on Page iii. Table 1 shows a 2019 baseline of 907. Table 4, as of the fall of 2019, lists 825 beds. The difference between the two tables is 82 beds. Please clarify.

Page 18:

1. What percent of forensic patients call into the "not guilty by reason of insanity" (NGRI) category?
2. What is the average length of care for a civil commitment patient?
3. Minus NGRI patients, what is the average length of care for forensic patients?

Page 19:

1. Under DSHS Goals, there is a concern that Residential Treatment Facilities will not be available in time to relocate WSH patients. If this is the case what are the scenario's DSHS has considered to relocate the WSH civil commitments? Is one scenario relocating civil patients into AFHs?

2. Over the past two years, how many WSH patients now reside in AFHs in Lakewood?
3. Based on the figures provided in "facility siting" and "Washington State demographics," approximately 268,450 people having serious mental illnesses are in the Puget Sound area. That number would suggest that there are not enough mental health facilities in Washington State currently, and that the problem will become more acute over time. Please provide figures that show the total capacity of WSH with the construction and remodel of each facility, in conjunction with the demolition of each facility, so we can evaluate total possible capacity.

Page 20:

1. Under *Replacement Cost*, DSHS has estimated a land value of \$1.6 million/acre. This number seems exceptionally high, please provide details to support this figure.
2. Under Table 5, include a tabulation of the number of beds per category:
 - a. Projects in Development [116];
 - b. New Construction [416];
 - c. Demolitions [-212]; and
 - d. Total, 320.

Page 22:

1. Figure 13: Since this document was submitted, the City had been made aware of several alternatives currently under review by the State legislature for the siting of the future hospital. One of the options includes constructing the hospital on the property that is currently zoned Open Space, north of the existing campus. Should this proposal be moved forward, the Public Facilities Master Plan and SEPA Checklist will need to be amended. An additional public comment period will be required.
2. Once the WSH Master Plan is approved, there is a need to provide more precise delineation between the Adult Hospital Zone, the Sensitive Area, and the OSR 1 zone. Please create a graphic outlining each area prior to the public hearing.

Page 24:

1. Please identify the green rectangle illustrated next to the MOD Maintenance Building?

Page 25:

1. Please provide additional details for the new forensic hospital. Is it going to be five-stories? Is there going to be a fence around the facility? Any concerns from DSHS/WSH about having the hospital so close to a major street, a regional park, and a nearby high school?

Page 27:

1. Please provide a list of dates when structures would be demolished.
2. Related to EIS question – DSHS is demolishing 418,054 SF, but adding 723,740 SF. That's a net increase of 305,686 SF.

Existing building SF	1,435,000
Minus demo SF	-418,054
	1,016,946
Add new buildings SF	+723,740
	1,740,686

Please explain the following perceived inconsistency: Based on the information provided, there is approximately a thirty percent (30%) increase in building area and a twenty percent (20%) increase in parking; however, the stated total number of beds, staffing, and vehicles trips decrease in the TIA and Master Plan document.

Page 30:

1. WSH proposes to add a new driveway and to enhance an existing driveway. Please provide available design details and dates/timelines for the construction of these improvements.

Page 31:

1. Please provide additional details on the "wayfinding program."

Page 36:

1. Define "Controlled Zone."
2. Define "Secured Facility Perimeter."
3. Because of choice of colors, difficult to identify, "Existing Security Fence." Please adjust.

Page 37:

1. Buildings 28 & 29 will be housed for NGRI patients. Please identify how many NGRI patients will occupy the buildings. If the City assumes the current existing bed count for these buildings, the total comes to 310.
2. Please provide additional details regarding security for Buildings 28 & 29 and the new forensic hospital. The plan states "patient access to the outdoors within the secured area." Please identify the proposal to secure the area.

Page 38:

1. Please identify reservoirs on the park property on the map, or provide a diagram that illustrates how the water from the reservoirs is transported to WSH Campus.

TRANSPORTATION IMPACT ANALYSIS (TIA) submitted on February 14, 2020

Contact: Franc Sawatzki (253) 983-7787

Page 4:

1. TIA Table 1: mid-term bed count adds up to 1,165 not the 815 listed. Please clarify.
2. The number of beds in the chart does not match the description within TIA. Please clarify.

Page 7:

1. 1st paragraph, 2nd sentence: change "east" to "west".

Page 37:

1. Non-Motorized and Transit Conditions, 2nd paragraph, should reflect that the City's plan for Steilacoom Blvd improvements, in front of the WSH campus, is to install a sidewalk on the north side of Steilacoom Blvd. The City plans do not include turn pockets or turn lanes for this section of roadway.

Page 38:

1. Please provide additional information on why the 85th percentile vehicle speed is assumed to be higher than 40 mph. The posted speed is 35 mph.

Page 45:

1. Table 20, please clarify if the "Proposed Action" columns reflect existing conditions. The City understands that the location of future parking areas in proximity to work locations will be a factor in the ingress/egress paths of employees. Please indicate how the proposed WSH Plan parking design supports your trip estimates at the study intersections.
2. Add an on-site parking analysis. The TIA states parking will be addressed with new pavement and striping as improvements occur, but fails to link that statement with data or a timeline from the WSH Plan.
3. Include design and estimate data for the expansion of existing left turn lanes to accommodate current/future queues at Steilacoom/Sentinel WBLT, and Steilacoom/87th south-bound left turn.
4. Please explain how existing access points off of Sentinel Street and Golf Course Road will be controlled.
5. The TIA indicates a decrease in total traffic while the proposed WSH Plan indicates an increase in patient capacity. Please explain the calculation process used to determine the decrease in daily trips.
6. There is a continuing concern about resident capacity. This was brought up in our August 20, 2019, meeting with hospital staff and has not yet been clearly addressed. The trip estimates will need to be based upon the maximum number of patients at any one time and these estimates should be in concurrence with the Master Plan.
7. Is the maximum resident capacity actually going up or down? The trip generation volumes have been lowered due to an 11 percent to 12 percent reduction of beds; however, the plans call for adding 450,000 SF building space.
8. Please clarify if the table takes into account access restrictions at Sentinel Street and Golf Course Road.

General Comments on the Traffic Impact Analysis:

1. Has the designer considered widening the Chapel Gate Drive entrance to better accommodate turning traffic? A left turn pocket would allow right turning traffic to continue with less delay than waiting for a single vehicle turning left.
2. The City does not object to the addition of turn lanes and turn pockets to the design of Steilacoom Boulevard SW. Currently, there are constraints to widening the roadway based on existing right of way. If WSH wishes to remove the historic rock wall they could then dedicate additional right of way along the north side of Steilacoom Blvd., thereby creating sufficient width for an improved roadway design.
3. The City is concerned that our current design efforts and near term construction work to improve Steilacoom Boulevard will be significantly impacted by the option being considered under the Master Plan for two new traffic signals and/or left turn pockets and center turn lanes. It remains unclear what the preferred option(s) are from the analysis. If two signals are installed, a center turn lane is not needed for

the entire length, just left turn pockets at the intersections. If stop sign controlled entry onto Steilacoom Boulevard is an option at one or both intersections, then a center turn lane may well be warranted. In either case, the City is challenged evaluating the traffic analysis within the WSH Master Plan based on the vagueness with the preferred option. This needs to be clarified in the next version of the document or response to comments.

4. The City would consider supporting a plan to place a public sidewalk on the north side of the historic rock wall. That placement may, in some areas, create sufficient available right-of-way to allow for the installation of turn pockets or lanes.
5. Consider making Chapel and CSTC driveways right in-right out driveways to address Level of Service (LOS) issues. The signal at Circle Drive can handle additional traffic. This plan may require additional onsite improvements, but may be less expensive than traffic signal installation. This would also not add traffic signals the City would be required to maintain. The Circle Drive signal may be able to also handle traffic from Sentinel Drive and 87th Avenue (roughly 20%).

Traffic Impact Analysis Additional Issues:

1. New signals will add additional costs for the City to own and maintain.
2. Replacing one signal with two new signals will increase travel time for the general public along Steilacoom Boulevard SW. Please provide an assessment of the increased time for travel between 87th and Farwest Drive.
3. Should WSH chose to relocate the newer signal at Circle Drive recently installed by the City, the relocation will be done at WSH expense.
4. The question of ownership, responsibility, and maintenance of the tunnel under Steilacoom Boulevard SW still needs to be addressed. Please clarify.
5. The City is concerned that the listed number of beds for future planning is a reflection of an "ideal concept" and does not represent the actual maximum capacity of the structures. Please clarify
6. The City requests a timeline showing how the frontage improvements and internal traffic circulation changes will be developed concurrently with the onsite improvements proposed by the WSH Plan. The City's concern is that some of the developments could cause "temporary" traffic issues lasting eight years until the next scheduled improvement which would relieve the issue.
7. The proposed new traffic signals on Steilacoom at the Chapel and the Child Study Treatment Center (CSTC) driveways appear to not be fully warranted by the LOS now and in the future. Typically, multiple warrants must be met for installation of a traffic signal. Only one warrant is suggested. Both driveways meet only 1 warrant (1 hour volume). With the volume reduction at Circle Drive, Chapel meets and CSTC is close to a second warrant (4 hour volume).

The warrants are based upon peak PM hour volumes between 4 and 6 PM. Shift change, the peak WSH traffic volumes and notable impact to Steilacoom Boulevard SW occurs at 3 PM.

The 4 hour warrant is based upon a 70 percent factor assuming 85 percent speed on Steilacoom Boulevard SW is over 40mph which may not be accurate.

ADDITIONAL SITING CRITERIA FOR MENTAL HEALTH FACILITIES submitted on May 11, 2020

Contact: Courtney Brunell (253) 983-7839

Page 1:

3. Has a timeline been identified between WSH and Lakewood Water District to complete the water service transfer?
4. The answer to question "C" states, "No development is proposed in areas of the site zoned for Open Space, or on areas of existing active open space." Since this document was submitted, the City had been made aware of several alternatives currently under review by the State Legislature for the siting of the future hospital. One of the options includes constructing the hospital on the property that is currently zoned Open Space, north of the existing campus. Should this proposal be moved forward, the WSH Plan will need to be amended. An additional comment period would be required.

SEPA CHECKLIST submitted February 25, 2020

Contact: Courtney Brunell (253) 983-7839

Page A7-3:

1. The answer provided in question 11 states that an update to the WSH Master Plan was prepared in 2008; please clarify that the proposed update was not actually adopted. The current Master Plan is 1998-approved document. The 1998 Plan has been amended via administrative use and conditional use modification permits, but has not undergone a comprehensive update.
2. Question 11 asks for a complete description of the proposal.
 - Please clarify the size of the project and site.

Page A7-9:

1. The answer provided in B. 1. states that the control of the existing water wells will go to Lakewood Water District and that future water needs will be supplied by Lakewood Water District.
 - Please provide a timeline of this transfer in conjunction with the construction of new buildings. Will the additional structures be connected to the Garrison Spring wells, or Lakewood Water District services?

Page A7-17:

1. The answer to question 8.a. states that, "...the proposed Master Plan incorporates a more compact facility footprint to allow for greater security."
 - Can you expand on this statement to illustrate how the campus and campus facilities will be more compact than what currently exists on site?
 - Additionally, please provide security detailing for the new hospital facility and buildings 28 & 29, which will house additional NGRI patients. Security features are important as the City evaluates the impact of the new facility on adjacent uses.

2. The answer for question I states, "The health-care facilities are projected to serve 800-900 patients, with a staff of approximately 2,100." The WSH Plan gives a range of 481+ to 1,023 patients currently and in development.
 - Please provide a near term and long term bed-count and total patient capacity for Buildings 17, 18, 19, 20, 21, 27, 28, 29 and the new forensic hospital current, during-development and long term.
 - Please update the checklist so the numbers are consistent between the WSH Plan and SEPA checklist.

Page A7-18:

1. The answer to question I states that the revised Master Plan concept will increase compactness which, in turn, improves the security for the patients and neighbors.
 - Please clarify which facilities will become more compact. It appears that in addition to the new hospital, patients will continue to be placed in Buildings 17, 18, 19, 20, 21, 27, 28, and 29.
 - What are the proposals for the common areas, which are identified to be demolished and replaced?
 - What will the internal networking system be to ensure security between buildings for staff and patients?

Page A7-20:

1. The answer to question b states, "The proposed Master Plan improvements are not expected to have permanent impact to off-campus recreational uses and would preserve the existing open space at the former Fort Steilacoom Golf Course and nearby areas currently used for disc golf." Since this document was submitted, the City had been made aware of several alternatives currently under review by the State Legislature for the siting of the future hospital.

One of the options includes constructing the hospital on the property that is currently zoned Open Space, north of the existing campus. Should this proposal be moved forward, the WSH Plan and SEPA Checklist will need to be amended. An additional comment period will be required.

Section III Summary of Public External Agency Comments:

Pursuant to the Lakewood Municipal Code a combined Notice of Application for the Public Facilities Master Plan and SEPA checklist was issued on June 10th with a 30 day comment period. The City received 20 public comments and 55 Facebook comments regarding this proposal. The application was also distributed for review to internal City departments and outside agencies. Agency comments were received from:

1. City of Fife;
2. Lakewood Chamber of Commerce;
3. Lakewood Police Department;
4. City of University Place;
5. Disability Rights Washington;
6. Historic Fort Steilacoom Association;
7. Pierce County Department of Health;
8. Town of Steilacoom;
9. Washington State Department of Archaeology and Historic Preservation; and
10. Washington State Department of Ecology.

All public and agency comments are included as exhibits.

Section IV Next Steps and Resubmittal Requirements:

The above mentioned comments are required to be addressed prior to moving forward with the WSH Plan process and SEPA issuance. In order for staff to continue the review of the Western State Hospital applications, please re-submit all required materials electronically to permits@cityoflakewood.us within ninety (90) days of this correction letter. Should you need additional time, please contact cbrunell@cityoflakewood.us or tspeir@cityoflakewood.us to request an extension. If you have questions regarding this letter, please contact me and/or the appropriate City staff member identified in the sections above.

Respectfully,

Courtney Brunell
Planning Manager
City of Lakewood
(253) 983-7839
cbrunell@cityoflakewood.us

Exhibits:

- A. Comment received from City of Fife
- B. Comment received from Lakewood Chamber of Commerce
- C. Comment received from Lakewood Police Department
- D. Comment received from City of University Place
- E. Comment received from Disability Rights Washington
- F. Comment received from Historic Fort Steilacoom Association
- G. Comment received from Pierce County Department of Health
- H. Comment received from Town of Steilacoom
- I. Comment received from Washington State Department of Archaeology and Historic Preservation
- J. Comment received from Washington State Department of Ecology
- K. Public Comment from Ross Adams received June 12, 2020
- L. Public Comment from John Adzysinski received July 10, 2020
- M. Public Comment from Nichole Ayers received June 22, 2020
- N. Public Comment from Betty Boguszewski received July 10, 2020
- O. Public Comment from Carol Campbell received July 7, 2020
- P. Public Comment from Kevin Campbell received June 12, 2020
- Q. Public Comment from Doug Eagle received June 22, 2020
- R. Public Comment from Jordan Graham received July 2, 2020
- S. Public Comment from Rita Happy-Wheeler received June 19, 2020
- T. Public Comment from Angela Harris received July 7, 2020
- U. Public Comment from Doug Helland received July 9, 2020
- V. Public Comment from John McPherson received June 22, 2020
- W. Public Comment from Melissa Dean received June 29, 2020
- X. Public Comment from Joyce Morones received July 6, 2020
- Y. Public Comment from Stephen Myers received June 22, 2020
- Z. Public Comment from Devin Scott #1 received June 11, 2020
- AA. Public Comment from Devin Scott #2 received June 11, 2020
- BB. Public Comment from Devin Scott #3 received June 14, 2020
- CC. Public Comment from Nicole and Mark Trahan received June 11, 2020
- DD. Public Comment from Eric Vonderscheer received July 9, 2020
- EE. Facebook Comments Received June 10, 2020 to July 10, 2020 RE project

Courtney Brunell

From: Tiffany Speir
Sent: Monday, June 29, 2020 1:40 PM
To: Courtney Brunell
Subject: FW: Reminder - please comment on Wester State Hospital Master Plan update by July 10, 2020

Tiffany Speir*, Esq., CPM®
Planning Manager - Long Range/Strategic Planning



253.983.7702 | c 253.204.9643 | tspeir@cityoflakewood.us

*Tiffany Speir does not provide legal representation for the City of Lakewood

www.lakewoodstation.org



From: Steve Friddle [mailto:sfriddle@cityoffife.org]
Sent: Monday, June 29, 2020 1:38 PM
To: Tiffany Speir <tspeir@cityoflakewood.us>
Cc: Jennifer Miller <jmiller@cityoffife.org>
Subject: Re: Reminder - please comment on Wester State Hospital Master Plan update by July 10, 2020

This email originated outside the City of Lakewood.

Use caution when following links or opening attachments as they could lead to malicious code or infected web sites. When in doubt, please contact the HelpDesk.

- helpdesk@cityoflakewood.us ext. 4357

Hi Tiffany,

Thank you for the reminder. Fife has no comment.

Best wishes,

Steve Friddle
Fife Community Development Director

From: Tiffany Speir <tspeir@cityoflakewood.us>
Sent: Monday, June 29, 2020 10:55 AM
To: Tiffany Speir <tspeir@cityoflakewood.us>
Cc: Courtney Brunell <CBrunell@cityoflakewood.us>
Subject: Reminder - please comment on Wester State Hospital Master Plan update by July 10, 2020



July 9, 2020

City of Lakewood
Attn: Community and Economic Development Department
6000 Main Street SW
Lakewood, WA. 98499
cbrunell@cityoflakewood.us

On behalf of the Lakewood Chamber of Commerce, thank you for the opportunity to provide public comment on the proposed changes outlined in the update to the Western State Hospital "Master Plan."

We understand there are currently two other proposals under consideration by the legislature. Unfortunately, we have not seen those proposals to determine if this "Master Plan" has merit.

In reading the "Master Plan," we have more questions than answers as presented.

Why does DSHS want to build another forensic hospital in Lakewood? We understand that Western State Hospital already has a forensic unit that is currently being used. If a new one is built, what would the existing forensic unit be used for, if at all?

The plan indicates that DSHS wants to "temporarily" expand hospital capacity ~ and in the long-term, transition the hospital to serve primarily forensic patients. That leaves 850 civilly committed patients to go where? The four (4) for-profit enhanced facilities for civilly committed patients don't appear to have a very good track record, and that appears to be the direction the state is looking at providing/building for current Western State patients. No specific plans for locations/facilities with occupancy information have been provided.

If we understand correctly, additional facilities with the capacity for at least 850 beds will be needed throughout the state. Preliminary numbers show Washington could lose \$7 billion in state revenue through 2023 as the coronavirus pandemic takes its toll. Where does that leave us in Lakewood? A partially built forensics unit? No budget to relocate current patients to proper facilities?

Will the state continue to abuse our city by allowing more adult residential homes? We already have a significant percentage ~ which is one-third of all adult family homes in Pierce County. Our concern is the state will undoubtedly run out of money with no well thought out plan ~ thus, overburdening the City of Lakewood with more social service needs.

It is our hope that DSHS will come back with a more thoughtful and detailed plan. Clearly, the health and safety of our community do not seem to be taken into consideration at all.

Thank you for this opportunity to add our voice.

Best regards,

Linda Smith
President/CEO



July 17, 2020

Don Anderson
Mayor

Courtney Brunell
Planning Manager
City of Lakewood

Jason Whalen
Deputy Mayor

Courtney,

Mary Moss
Councilmember

The purpose of this letter is to provide comments from the Lakewood Police Department on the Western State Hospital (WSH) Master Plan submitted to the City for review.

Michael D. Brandstetter
Councilmember

In reviewing the plan (Revision #3, LU-20-00027), I understand that it calls for the construction of a new 350-bed Forensic Hospital on the grounds. This is in addition to two current projects designed to increase the existing Center for Forensic Services (CFS) by 98 beds. Simultaneously, it calls for a reduction in Civil Commitment beds from 500 down to 153. They indicate this is part of their overall strategy of distributing new civil commitment treatment facilities in communities throughout the state, rather than consolidated at WSH. Although, this Master Plan does call for a possible new 48-bed Residential Treatment Facility on the campus.

John Simpson
Councilmember

Linda Farmer
Councilmember

Paul Bocchi
Councilmember

John J. Caulfield
City Manager

In general, the Police Department is not opposed to the strategy of transitioning WSH into a largely forensic hospital with a much lower civil commitment population. From our experience, we receive far fewer calls for service and reports of criminal acts occurring in the forensic wards, largely due to the higher security and staffing levels found in those facilities versus the lower levels in the civil wards. In that sense, we would prefer properly designed, constructed, and managed forensic wards over civil commitment wards.

We do, however, have three primary concerns as illustrated in this Master Plan. The first is the design and security protocols in the new forensic hospital. This Plan seems to indicate less restricted patient movement and increased interaction, with both staff and other patients. This is a cause for concern as it increases the risk of assaultive behavior, one of the more common police calls for service to the WSH. We would ask for much more



detail on the design and operation of this planned forensic hospital to be included in this Master Plan.

The second area of concern is the planned Residential Treatment Facility (RTF). In this Plan, they indicate they are reserving space for such a facility. This type of facility would not have the same level of security and supervision as a forensic hospital and, in our experience, would create an increase in calls for service. We would like more information on what process will be used to determine whether this facility is located on the WSH campus and how its' impacts would will be mitigated.

The third area of concern is whether the total number of forensic beds does, in fact, decrease as depicted in Table 1, Page iii. This Plan states that the current addition and renovation to the CFS will add 98 beds within the next 1-5 years to a total of 458 forensic beds. According to the plan, these beds would decrease to 183 once the new forensic hospital is built. Our concern is that after spending significant capital to add and renovate to these existing structures, they will not be downsized but kept near full occupancy or transitioned to other use, such as civil commitment beds. This would create the potential for 808 forensic beds in three separate buildings on the campus. The Plan indicates that the projected population of the CFS is "TBD" after ten years. This indicates that the CFS very well could return to full occupancy, as needed, in the future.

We enjoy a great partnership with the Western State Hospital and have every hope that this will continue to be a lasting, positive relationship. We look forward to additional information regarding our concerns outlined above. Thank you for your attention to this matter.

Respectfully submitted,

John C. Unfred
Assistant Police Chief



July 10, 2020

Courtney Brunell, MPA
 Planning Manager
 City of Lakewood
 6000 Main Street
 Lakewood, WA 98499

RE: Western State Hospital Master Site Plan 2020

Dear Mrs. Brunell

Thank you for the opportunity to comment on the proposed Western State Hospital Master Site Plan 2020. The City of University Place has the following questions and comments regarding the proposal.

- 1) Under Project Need in the Master Site Plan Executive Summary it states in part "A core goal of the new state policy is to distribute services for civil commitment patients throughout the state, so that patients can be near family and community support. The model for this care is a combination of community hospitals and residential treatment facilities of 16 to 48 beds each."

While under Project Description it states in part "The master plan also allocates space for a new community residential treatment facility (RTF) of 48 beds, contingent on completion of a parallel study to site community facilities throughout the region."

Taking these two statements together it would appear that the intent is to site services for civil commitment patients throughout the state, but only site community residential treatment facility throughout the region. To be equitable community residential treatment facilities should be sited across the state rather than just the region.

- 2) The statement "The master plan also allocates space for a new community residential treatment facility (RTF) of 48 beds, contingent on completion of a parallel study to site community facilities throughout the region." is somewhat confusing. Does this mean the 48-bed facility will not be sited at the WSH campus until the study is complete and if so, will the civil commitment patients remain in existing facilities at the WSH campus until the study and the 48-bed facility are both completed?
- 3) Is the parallel study available for review and comment?
- 4) The Executive summary states in part "The approach to behavioral health care has also evolved, meaning that many of the WSH facilities are no longer well-suited to the provision of core services..." making a distinction between forensic patients and "civil commitment" "patients (those determined by the courts to be a potential danger to themselves or the public, but not accused of a crime)." The Executive Summary also states in part "A core goal of the new state policy is to distribute services for civil commitment patients throughout the state, so that patients can be near family and community support."

A significant problem with this approach is the lack of support from communities and families that do not have the financial resources or ability to cope with patients that are a potential danger to themselves or the public. As a result, many of these patients end up amongst our homeless population to fend for themselves with very little support.

- 5) The Environmental Checklist asks, "Approximately how many people would the completed project displace?" To which the Applicant replied "Approval of the Master Plan and construction of the individual projects will not result in displacement. However, the WSH MSP states a core goal of the project is to displace or move the majority of the civil commitment patents offsite and resettle them across the region."

The Applicant should address this displacement and state how the impacts associated with this displacement will be mitigated.

- 6) Likewise, the Applicant states the hospital is not considered housing units and therefore there will be no impacts associated with housing.

“Proposed measures to reduce or control housing impacts, if any:

None proposed. The Master Plan and construction of the individual projects will not result in housing impacts.”

If civil commitment patients are to be moved into adult family homes and other types of housing, there will be housing impacts associated with the project.

- 7) In the Environmental Checklist under Public Services the Applicant responded to the following questions as follows:

- a) Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

The proposed Master Plan improvements will not result in an increased need for public services, including fire protection, police protection, public transit, health care, or schools.

- b) Proposed measures to reduce or control direct impacts on public services, if any.

None proposed. The proposed Master Plan improvements will not result in an increased need for public services. The environmental checklist

The Applicant should explain how increasing the population at WSH with a concentration of forensic patients will not have an impact to public services. Likewise, the Applicant should address what impacts will result from distributing the civil commitment patient population into other locations in the state / region and mitigation for those impacts.

- 8) Civil commitment patients have been moved into numerous adult family homes in the vicinity of WSH. Will this practice continue? If so, are there any efforts to distribute the location of these adult family homes to areas where patients originated from rather than concentrating them in the greater Lakewood, Steilacoom and University Place area.
- 9) University Place Police operate well below any peer jurisdiction regarding staffing and available resources. Until and unless additional funding is identified to be address acute mental health emergency response services, the City of University Place needs to take pro-active measures to mitigate these calls on our calls for service volume. We hope that the Western State Hospital planners consider the unintended consequences of these decisions into consideration as patients are re-integrated into our region.

Should you have any questions regarding our comments, please contact me a DSwindale@cityofup.com.

Sincerely,

Courtney Brunell, MPA

July 21, 2020

Page 3

David Swindale, AICP

Director, Planning and Development Services

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Thursday, July 9, 2020 4:54 PM
To: Courtney Brunell
Subject: Form Submission - New Form

This email originated outside the City of Lakewood.

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- helpdesk@cityoflakewood.us ext. 4357

Name: Beth Leonard

Email: bethl@dr-wa.org

Message: Disability Rights Washington (DRW) has significant concerns about the proposed Western State Hospital (WSH) Master Plan. This Plan would result in the demolition of buildings that currently provide in-patient treatment to Washingtonians with psychiatric disabilities. The proposed demolition includes Building 27, which houses the recently renovated and opened Fort Steilacoom Competency Restoration Program (FSCRCP) that is a product of the A.B. v. D.S.H.S. (Trueblood) lawsuit. DRW is uniquely situated to comment on this Master Plan because it is the designated protection and advocacy program for Washingtonians with disabilities (RCW 71A.10.080) and it is the organizational plaintiff and class counsel in the Trueblood lawsuit.

DRW's primary concern is the proposed destruction of FSCRCP, which provides critically needed competency restoration services and was renovated and opened for service only last year. Washington State lacks the necessary capacity to provide timely competency restoration to all the individuals who meet clinical evaluation criteria for this treatment. Through the Trueblood lawsuit, a Federal Court found that the State's inability to provide timely competency restoration services to Trueblood class members violated class member's constitutional rights. Opening FSCRCP in August 2018 to provide competency restoration treatment is part of a time-intensive and years-long process aimed at bringing the State into compliance with constitutionally required timeframes for providing competency restoration treatment to vulnerable class members waiting in jail. If FSCRCP is demolished, there is a significant likelihood that the loss of capacity to provide competency restoration services would further exacerbate the State's ongoing non-compliance with constitutionally required competency restoration treatment timeframes.

The 2018-2019 renovation of FSCRCP was funded by the Federal Court using millions of dollars in contempt fines paid by Washington State due to its failure to provide competency restoration treatment within constitutionally required timeframes. The purpose in spending these contempt fines on FSCRCP was to benefit Trueblood class members by investing in a facility that could help alleviate suffering—class members decompensate and are harmed as they wait for months in jail for restoration treatment.

Washington State has also spent significant amounts of its own money to hire staff and operate FSCRCP. The state has taken great pride in the facility and its operations. Demolishing FSCRCP after only recently initiating operation would result in a significance waste of public funds, is counter to the spirit of investing on behalf of Trueblood class members, and endangers the state's commitment to the Trueblood 2018 Settlement Agreement. Demolition of this facility prolongs the already significant time that the state has been subject to the Trueblood Court Order and contempt order, and risks re-initiation of millions of dollars in monthly contempt fines against the state.

FSCRP should be preserved so as not to waste contempt funds and other public monies spent to benefit vulnerable Washingtonians and Trueblood class members in need of treatment. For the foregoing reasons, DRW opposed the proposed WSH Master Plan.

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: info@historicfortsteilacoom.org
Sent: Thursday, June 25, 2020 5:19 PM
To: Courtney Brunell
Subject: Comments on WSH Master Plan

This email originated outside the City of Lakewood.

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- helpdesk@cityoflakewood.us ext. 4357

Hello Courtney

The officers and directors of the Historic Fort Steilacoom Association support the DSHS proposal. Implementation will improve public access to our historic buildings and the parade ground by parking shifts and traffic revisions. DSHS recognized that our museum is a unique resource on the campus and invited us to participate in the development process. We shared our ideas with the planning team as documented in Appendix 1. Once the new hospital and associated parking in the western end of the campus is built, our museum guests will be able to view the historic markers placed by the Lakewood Historical Society and gain easier access to our buildings. Currently visitors can do this only on a weekend day when far fewer hospital employee vehicles are present. We appreciate that land in the Historic Fort Zone has been identified for a potential visitor center that will greatly enhance our interpretive efforts. In conclusion, this plan provides for historic preservation initiatives that will benefit our museum mission and attract more visitors to Lakewood.

The Historic Fort Steilacoom Association requests to become a party of record.

Joe Lewis
Secretary

SEPA Comment Letter

July 01, 2020

Record ID: SR0251816

ATTN COURTNEY BRUNELL
CITY OF LAKEWOOD
6000 MAIN ST SW
LAKEWOOD WA 98499
CBRUNELL@CITYOFLAKEWOOD.US

RE: SEPA Review, Western State Hospital Master Plan LU-20-00027 & LU-20-00030

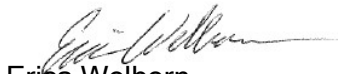
Dear Courtney Brunell:

The Tacoma-Pierce County Health Department's Environmental Health Program received the above mentioned checklist on June 10, 2020 and has reviewed your proposal.

There are no comments at this time to the proposal as presented.

Thank you for the opportunity to respond.

Sincerely,



Erica Welborn
Environmental Health Specialist II
Environmental Health Division

Town of Steilacoom comments on the Washington State Hospital Master Plan revision

**Courtney Brunell
Planning Manager
City of Lakewood**

July 13, 2020

Ms Brunell:

Thank you for the opportunity to comment on this project.

Sentinel Drive

This roadway provides access to Steilacoom High School and the residents on Pickett Street, Heath Court and Tolmie Court. The roadway was recently upgraded with sidewalks on both sides. The Department of Social and Health Services granted two easements across the Western State Hospital campus to the Town of Steilacoom for the roadway.

The Town concurs with the traffic study's recommendation to reduce the amount of on-going traffic on Sentinel Drive. Shutting the South Street access off Sentinel Way and moving Hospital access to the proposed Chapel Gate access will result in less traffic on Sentinel Way.

The Town is concerned that Sentinel Way not be used during construction. There is only one way in and out for the high school and residents in the area and adding construction traffic to the road will overtax its capacity.

Steilacoom Boulevard

The Town of Steilacoom and the City of Lakewood jointly planned improvements to Steilacoom Boulevard from Puyallup Street in Steilacoom to Phillips Road SW in Lakewood. Steilacoom has completed its upgrade of the roadway and sidewalks in accordance with that plan.

Opening two new gates to the Hospital will require changes to the City's plan for Steilacoom Boulevard, with additional right of way acquisition for turn lanes or roundabouts. The Town believes the pedestrian and non-motorized vehicle improvements planned for the Boulevard should remain regardless of the configuration ultimately approved.

Should the State or City determine that Steilacoom Boulevard should be reduced to two traffic lanes and a center turn lane along the front of the Hospital, the Town requests that the impact on traffic at the Steilacoom Boulevard/Farwest Drive/Sentinel Dive intersection be reviewed.

Sanitary Sewage

The description of the proposed upgrades to the Hospital's sanitary sewage system is accurate. It is imperative that the Hospital install the meters on the sewage discharge pipes so that an accurate measurement of the flow can be made.

48 bed facility

The 10-year plan includes a possible 48-bed civil residential treatment facility (RTC) in addition to the "forensic" hospital and the CSTC. The Town respectfully points out that the accompanying evaluation of the RTC recommends that it be built in Vancouver, rather than Lakewood. Those reasons include the current lack of any type of residential treatment facility in Southwest Washington.

Adding the RTC to the WSH campus will unduly concentrate the mental health treatment facilities in one place, contrary to the Governor's expressed desire that mental health treatment be community based. It will also deprive Southwest Washington of a treatment facility close to family and support groups in Vancouver and the surrounding area.

Thank you again for the opportunity to comment,

Doug Fortner
Town Planner
Town of Steilacoom



July 8, 2020

Ms. Courtney Brunell
Planning Manager
City of Lakewood
6000 Main Street, SW
Lakewood WA 98499
cbrunell@cityoflakewood.us,

In future correspondence, please refer to:
Project Tracking Code: 2020-07-04363
Property: Western State Hospital/Fort Steilacoom Historic District
Re; WSH Master Plan

Dear Ms. Brunell:

The Washington State Department of Archaeology and Historic Preservation (DAHP) is in receipt of the Western State Hospital (WSH) Draft Master Plan and SEPA Checklist pertaining to proposed demolition and new construction at the WSH campus. The Master Plan and Checklist have been reviewed on behalf of the State Historic Preservation Officer (SHPO) under the auspices of the State Environmental Policy Act (SEPA). Our review is based upon the documents accessed at WSHMasterPlan.org and consists of the following comments and recommendations for your consideration:

1. On page 9 in the Planning Context of the Master Plan and under the "State of Washington" heading, the document mentions the Growth Management Act and SEPA as well as applicable State land use review statutes and regulations. We recommend also mentioning Governor's Executive Order 0505. Executive Order 0505 requires State agencies (Department of Social and Health Services (DSHS) in this instance) to consider the effect of Capital Budget funded actions on cultural and historic resources by consulting with interested and affected Tribes and DAHP. While the Master Plan itself may not be subject to 0505 review by Tribes and DAHP, clearly proposed demolition and construction at the WSH campus will require that consultation to take place. More information on the Executive Order can be found at DAHP's website here: <https://dahp.wa.gov/project-review/governors-executive-order-05-05>.
2. We note and support the Master Plan has a stated commitment to preserve the four Fort Steilacoom structures (40-43) as well as the settler's cemetery, Morgue (14b), and the former Bakery (14a). DAHP looks forward to close and continued coordination with the City, DSHS, Tribes, and Historic Fort Steilacoom on short and long-term management of these properties as significant cultural resources.



3. We also note that the Master Plan calls for demolition of a substantial number of buildings on the campus including those considered as "contributing" resources to the historic district at WSH. According to Figure 11, buildings proposed for demolition date to the WPA era and comprise a significant portion of the total square footage of space proposed for removal. In view of the significant impact to historic buildings, we recommend that alternatives to demolition be considered, whether for all or for a select number. If demolition of all or a selection of the buildings is still the preferred alternative, then appropriate measures should be identified and implemented to mitigate for the loss of these resources. Potential mitigation scenarios should receive input from interested and affected parties and be commensurate to the degree of loss or damage to resources contributing to the historic character of the historic district.
4. Much of the WSH campus falls within the boundaries of archaeological site 45PI105, which contains artifacts dating from the Precontact Period through the Hospital Period. It is likely that additional archaeology is located outside of the current site boundaries. Any demolition or construction work within the archaeological site will require either a DAHP Monitoring Permit or a DAHP Site Alteration & Excavation Permit. Project areas that have not been previously surveyed by a professional archaeologist will need to be surveyed prior to ground disturbing activities associated with demolition or construction.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have questions, please feel free to contact me at greg.griffith@dahp.wa.gov or Stephanie Jolivet at Stephanie.jolivet@dahp.wa.gov.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer

- C: Brad Beach, Nisqually Indian Tribe, THPO Department
Lakewood Historic Preservation Commission c/o Courtney Brunell
Bob Hubenthal, Department of Social and Health Services
Joe Lewis, Historic Fort Steilacoom
Danny K. Marshall, Steilacoom Indian Tribe, Chair
Brandon Reynon, Puyallup Tribe, Cultural Resources
Sue Scott, President, Lakewood Historical Society





STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

July 9, 2020

Courtney Brunell, Planning Manager
City of Lakewood
Community Development Department
6000 Main Street
Lakewood, WA 98499

Dear Courtney Brunell:

Thank you for the opportunity to comment on the prethreshold consultation for the Western State Hospital Master Facilities Plan Project (LU-20-00027, SEPA LU-20-00030) located at 9601 Steilacoom Boulevard Southwest as proposed by Robert Hubenthal, DSHS. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SOLID WASTE MANAGEMENT: Derek Rockett (360) 407-6287

The applicant proposes to demolish an existing structure(s). In addition to any required asbestos abatement procedures, the applicant should ensure that any other potentially dangerous or hazardous materials present are removed prior to demolition. It is important that these materials and wastes are removed and appropriately managed prior to demolition. It is equally important that demolition debris is also safely managed, especially if it contains painted wood or concrete, treated wood, or other possibly dangerous materials. Please review the "Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes," on Ecology's website at: Construction & Demolition Guidance.

All removed debris resulting from this project must be disposed of at an approved site. All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. Contact the local jurisdictional health department for proper management of these materials.

**TOXICS CLEANUP/TACOMA SMELTER PLUME:
Eva Barber, Technical Assistance Coordinator (360) 407-7094**

This proposed project is located in an area that may have been contaminated with heavy metals due to the air emissions originating from the old Asarco smelter in north Tacoma (visit Ecology's Tacoma Smelter Plume map search tool: <https://fortress.wa.gov/ecy/smeltersearch/>).

Soil contamination from the former Asarco smelter poses a risk to human health and the environment. Children are at especially high risk from direct exposure to contaminated soil. Construction workers, landscapers, gardeners, and others who work in the soils are also at risk.

Ecology recommends that the lead agency include the following as conditions of approval, prior to the issuance of any site development permits or the initiation of grading, filling, or clearing:

- Sample the soil and analyze for arsenic and lead following the [2012 Tacoma Smelter Plume Guidance](#). The soil sampling results shall be sent to Ecology for review. If the project includes open space areas, contact the Technical Assistance Coordinator, Eva Barber, for assistance in soil sampling methodology within the open space area.
- If lead or arsenic are found at concentrations above the Model Toxics Control Act (MTCA) cleanup levels (Chapter 173-340 WAC); the owners, potential buyers, construction workers, and others shall be notified of their occurrence. The MTCA cleanup level for arsenic is 20 parts per million (ppm) and lead is 250 ppm.
- If lead, arsenic and/or other contaminants are found at concentrations above MTCA cleanup levels, the applicant shall:
 - 1) Develop soil remediation plan and enter into the Voluntary Cleanup Program with Ecology. For more information on the Voluntary Cleanup Program, visit Ecology's website at: <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm>.
 - 2) Obtain an opinion letter from Ecology stating that the proposed soil remediation plan will likely result in no further action under MTCA. The applicant shall provide to the local land use permitting agency the opinion letter from Ecology.
 - 3) Prior to finalizing site development permits, provide to the local land use permitting agency "No Further Action" determination from Ecology indicating that the remediation plans were successfully implemented under MTCA.
- If soils are found to be contaminated with arsenic, lead, or other contaminants, extra precautions shall be taken to avoid escaping dust, soil erosion, and water pollution during grading and site construction. Site design shall include protective measures to isolate or remove contaminated soils from public spaces, yards, and children's play areas. Contaminated soils generated during site construction shall be managed and disposed of in accordance with state and local regulations, including the Solid Waste Handling Standards regulation (Chapter 173-350 WAC). For information about soil disposal contact the local health department in the jurisdiction where soils will be placed.

The link below provides a fact sheet that explains more how the arsenic and lead clean-up levels were set and why Ecology sees that they are protective for human health:

<https://fortress.wa.gov/ecy/publications/SummaryPages/1109095.html>.

For assistance and information about Tacoma Smelter Plume and soils contamination, the applicant shall contact, Eva Barber with the Toxics Cleanup Program at (360) 407-7094 or via email at Eva.Barber@ecy.wa.gov.

Courtney Brunell

July 9, 2020

Page 3

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(GMP:202003072)

cc: Derek Rockett, SWM
Eva Barber, TCP

Courtney Brunell

From: Tiffany Speir
Sent: Friday, June 12, 2020 8:18 AM
To: Courtney Brunell
Subject: Fwd: Form Submission - Subscribe

Person wanting to be updated re WSH

Tiffany Speir
City of Lakewood

Begin forwarded message:

From: Squarespace <no-reply@squarespace.info>
Date: June 12, 2020 at 3:39:12 AM PDT
To: Tiffany Speir <tspeir@cityoflakewood.us>
Subject: Form Submission - Subscribe
Reply-To: rossadams7@gmail.com

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When in doubt, please contact the HelpDesk.

- helpdesk@cityoflakewood.us ext. 4357

Name: ross adams

Email: rossadams7@gmail.com

Mailing Address: po box 8501, tacoma wa, 98419

Phone: (253) 285-3343

Do you represent an organization or group?: No

If Yes, please type name of organization or group here.:

(Sent via WSHMasterPlan.org)

Exhibit L

7721 97th Ave SW
Lakewood, WA 98498
July 10, 2020

City of Lakewood
Attn: Community and Economic Development Department
6000 Main Street SW
Lakewood, WA. 9849

Subject: Western State Hospital Development

Ms. Brunell,

My primary concern is security. I realize the plan indicates there are secure areas for the forensic patients. I would like to think because of the nature of the patients, security would be improved over what has been in place over the years at Western State.

I live on a street that provides a backdoor to the open space, the former Pierce County Golf Course and the Disc Golf area. It also provides access to the back side of Western State Hospital. There is also a dirt road that goes down to the old Steilacoom wood mill on Chamber Creek. Although I am not aware of it happening often, the open space area provides an avenue of escape from the area.

Over the years, issues at Western State have caused concern, usually, after the fact. Usually we might get an indication of trouble when helicopters circle overhead, or hearing sirens in the distance and maybe, we might have a police car drive down our street. There has been no type of advance notice given to residents living around Western State. It was nice that we did receive notice of this proposed development.

We have lived here for many years. Although our street is generally quiet in terms of having issues, traffic, both foot and vehicle, can be busy. This happens throughout the day and night. Many walkers use the street to enter the open area. Cars drive down, turn around and leave, and sometimes they park to walk in the woods. In summer it is not uncommon for parties to enter the area after dark. Sometimes you see people who don't seem to have a legitimate purpose in walking through the neighborhood. We have had dumping at the end of the street, fires in the open space and indicators of "camping" on the old golf course and down the dirt road mentioned above. Finding out who is responsible for the open space, to report issues, is a challenge. The city says it is not them, Pierce County says not them now; so we are hearing it is Washington Department of Natural Resources.

The increased presence of people who present a higher risk to the community, should they escape, is a real concern. This is especially true if more smaller facilities are dispersed throughout the area. Lakewood seems to already have more than its share of group homes.

If this is to proceed, recommend a system be developed that notifies surrounding residents of the incident and provide an indication of the level of concern.

Respectfully submitted,

John Radzynski

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, June 22, 2020 3:59 PM
To: Courtney Brunell
Subject: Form Submission - New Form

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- helpdesk@cityoflakewood.us ext. 4357

Name: Nichole Ayres

Email: Nayres@valleycities.org

Message: This is sickening!! As a mental health provider it is clear to me that Mayor Anderson takes this as a joke!! Why don't you just quit while your ahead. Clearly the state should invest more into clinics like mine or the Cohen Clinics in general. What a laughable joke, it's unbelievable that all of you can get on the same page.

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Friday, July 10, 2020 12:27 PM
To: Courtney Brunell
Subject: Form Submission - New Form

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- helpdesk@cityoflakewood.us ext. 4357

Name: Betty Boguszewski

Email: sbogusze@gmail.com

Message: Thank you for asking for your citizens comments. I have lived in Lakewood over 40 years, and on and off there have been escapees from WSH. We also have the highest number of Adult Family Homes, which house various degrees of ex-criminals. It seems that we already have more than our share of challenged individuals roaming around Lakewood. You know there will be escapes, no place is iron clad. Please place your facility out of Lakewood, there are many other locations that are less populated, and have a lot less offenders already released into the general population.

Concerned citizen, voter and tax payer.

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, July 7, 2020 1:01 AM
To: Courtney Brunell
Subject: Form Submission - New Form

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- helpdesk@cityoflakewood.us ext. 4357

Name: Carol Campbell

Email: uu4choice@gmail.com

Message: I live in zip code 98498 and I support this expansion 100%.
Thank you.

(Sent via WSHMasterPlan.org)

Courtney Brunell

Exhibit P

From: Squarespace <no-reply@squarespace.info>
Sent: Friday, June 12, 2020 3:12 PM
To: Courtney Brunell
Subject: Form Submission - New Form

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Use caution when following links or opening attachments as they could lead to malicious code or infected web sites. When in doubt, please contact the HelpDesk.

- helpdesk@cityoflakewood.us ext. 4357

Name: Kevin Campbell

Email: campbellhouston@comcast.net

Message: Western State Hospital has faced years of failed leadership, broken its promises to improve the quality of operations resulting in losing its certification and access to Medicaid Funding. The State has failed at every turn to protect patients and the community. I what universe would the City Of Lakewood meet is duty to public safety by authorizing the increase of forensic placements within the city limits? The State cannot be trusted to operate the facility in compliance with national and international standards. The proposed use of this site is an end around regulation. The City is in no position to provide oversight of the facility during operation or the remedy a failure when it happens. The most prudent approach is to deny any proposed expansion.

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, June 22, 2020 11:54 AM
To: Courtney Brunell
Subject: Form Submission - New Form

This email originated outside the City of Lakewood.

Use caution when following links or opening attachments as they could lead to malicious code or infected web sites. When in doubt, please contact the HelpDesk.

- helpdesk@cityoflakewood.us ext. 4357

Name: Doug Eagle

Email: doug@dougeagle.com

Message: Please visit Patton Hospital in California. Their mode of care and supervision is very good. By blending psychiatric care and corrections, everyone stays safe. My brother was there for several months waiting for charges to be filed. He improved so much with medication and proper structure, he has been stable for almost 20 years. BTW, he improved so much, they dropped the felony charges and his case was dismissed. And Patton State Hospital is an asset to the community. Check out their website dsh.ca.gov/patton/ Good luck to all that suffer from mental illness and to their victims.

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Thursday, July 2, 2020 8:40 AM
To: Courtney Brunell
Subject: Form Submission - New Form

This email originated outside the City of Lakewood.

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- helpdesk@cityoflakewood.us ext. 4357

Name: Jordan Graham

Email: joggraham@gmail.com

Message: How can the city approve the continued raising of taxes on property when any one living near the hospital is all but but guaranteed to see a decrease in property value. Not to mention the moral objection to placing this facility across from the only high school in the steilacoom school district. Has the city done any outreach other than this to find out if citizens want this facility here? Many of my neighbors and friends living in lakewood would like to see WSH removed not expanded.

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Thursday, June 18, 2020 4:32 PM
To: Courtney Brunell
Subject: Form Submission - New Form

This email originated outside the City of Lakewood.

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- helpdesk@cityoflakewood.us ext. 4357

Name: Rita Happy-Wheeler

Email: ritastudents@gmail.com

Message: I have studied the master plan for redevelopment of the Western State Hospital campus. My area of expertise is in the nomination of the site as a National Historic District listed on the National Register of Historic Places. The new plan appears to be sensitive to the hospital's place in the historic district, paying special attention to primary and secondary structures and even the plantings and landscaping. It seems that collaboration with the Fort Steilacoom Historical Society has been--and continues to be--thorough. (Preserving the historic buildings would not have been possible without support of the hospital/state.) I appreciate your sensitivity to the work we did in historic preservation so that amazing resource will continue to inform us for generations to come.

Certainly there will be concerns about the hospital's siting in its current location, but we must remember that the hospital was there long before housing developments, businesses, the high school and the college. We wouldn't have Fort Steilacoom Park if the hospital/state hadn't declared that area surplus, allowing it to be repurposed as recreational land. It seems from the master plan that the new facilities will be more efficient and advantageous for patients and safer for the neighborhood.

Please continue to share information as plans for development continue.

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, July 7, 2020 7:49 PM
To: Courtney Brunell
Subject: Form Submission - New Form

This email originated outside the City of Lakewood.

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- helpdesk@cityoflakewood.us ext. 4357

Name: Angela Harris

Email: angela_harris_18@msn.com

Message: People convicted of a crime that are deemed mentally incompetent due to the drugs they have taken, do not belong in our community they belong in prison. Instead of building new forensic hospital, create them in prison where they have guards trained to deal with violent and unstable people. The hospital is having trouble finding doctors, nurses, and floor staff as it is due to the amount of injuries the staff is receiving.

I would rather the state out violent people convicted of a crime in prison, and do more outreach to stop the trend of homelessness and drugs that are infesting our cities.

(Sent via WSHMasterPlan.org)

DOUG HELLAND
7702 97th AVE SW
LAKEWOOD WA 98498
253-584-2255

doughelland@hotmail.com

July 9, 2020

C. Brunell
Planning Manager
City of Lakewood
Email cbrunell@cityoflakewood.us

Ref: Western State Hospital (WSH)

Thank you for taking the time to read of my concerns and objection to the changes proposed at the WSH.

As I understand it, the hospital will change from treating patients from civil commitment backgrounds to treating those with mental conditions plus criminal backgrounds. Since new construction is planned, there has to be many alternative sites in which to locate such a high security risk hospital rather than locating it between a public park and the residential area of Oakbrook. Just one concern are the large number of children using the park as well as those living in Oakbrook who live there, who wait for school buses, etc.

One aspect of concern with the current WSH is the lack of perimeter security. There is no effective fence between the hospital and Steilacoom Blvd. I have no idea what sort of barrier exists on the Oakbrook side.

I think that locating this type of facility in our area should be of great concern to the City and its residents.

Sincerely,

Doug Helland

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Sunday, June 21, 2020 11:34 AM
To: Courtney Brunell
Subject: Form Submission - New Form

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- helpdesk@cityoflakewood.us ext. 4357

Name: John McPherson

Email: historygeeks@comcast.net

Message: The new hospital master plan offers the community of Lakewood not only a reinvigorated hospital facility that better meets Federal safety guidelines but also an enriched cultural landscape that better preserves one of our state's historical treasures. As a Board Member with the Historic Fort Steilacoom Association and a history educator in our public schools, I am keenly interested in smart, thoughtful historic preservation that serves the interests of the community and its present and future residents. This master plan provides for intelligent improvements to the historic fort's parade ground sight lines and delineation of the fort's preservation landscape within the larger hospital complex. I support this master plan and I believe that the City of Lakewood will be well-served by its full implementation.

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, June 29, 2020 11:03 AM
To: Courtney Brunell
Subject: Form Submission - New Form

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- helpdesk@cityoflakewood.us ext. 4357

Name: Melissa Dean

Email: ldean@klp.com

Message: I am a resident of Oakbrook here in Lakewood, very close to this hospital.

I am very concerned about the outlook of this plan. Mainly, the commitment to move mental health patients to smaller facilities concerns me greatly because I am in a neighborhood that has many group homes.

The DSHS goals state:

"A core goal for DSHS is to provide more of the state's services to civil commitment patients through distributed models, both private and state-run."

I do not want mental health patients being allowed in these group homes (private model) because it directly affects the safety of our neighborhood and my family. In fact, it is becoming less and less a residential neighborhood already. My home is already surrounded by group homes and bunker homes for the group home workers that have a high turn around of employees.

With the new patients at Western State becoming "Forensic" patients, where would its civil patients go?

As stated in the executive summary, the hospital will focus on forensic patients but there is no commitment to not releasing the civil patients into Lakewood. This is very vague and concerning. I would like to see a transition plan because I don't see or know of other new civil facilities becoming available other than group homes that are in our residential neighborhoods.

"As new civil commitment facilities become available in western Washington, civil patient capacity at WSH will be reduced. Under this model, Western State Hospital itself will concentrate on treatment of forensic-commitment patients."

I am also concerned about the release of these forensic patients, when the time comes, what will be the release policy? Is there any scenario that these people be released into Lakewood? As all patients will not likely be looking at being released only back to jail because not all crimes are that serious and allow probation, etc.

On a positive note, I am happy about the new acres to Lakewood and I look forward to seeing the plans for parks/use in this area etc.

"Donating over 470 acres to the City of Lakewood and Pierce College for public parks and educational

facilities."

Thank you,
Melissa 650-771-3107

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Friday, July 3, 2020 2:52 PM
To: Courtney Brunell
Subject: Form Submission - New Form

Follow Up Flag: Follow up
Flag Status: Flagged

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- helpdesk@cityoflakewood.us ext. 4357

Name: Joyce Morones

Email: joycem984@gmail.com

Message: Hello, I hope you take the time to read and to respond to my question. First off, my main concern is the number of "forensic" patients that will be housed at WSH. With not only homes nearby but with our beautiful Ft. Steilacoom park nearby, it is very concerning.

My questions: It's hard for me to determine the distance of set back from the street of the new hospital. Please respond. ALSO, is there going to be cyclone fencing around this hospital. There needs to be a safety measure, however, cyclone fencing will be an eyesore from Ft. Steilacoom park and from Steilacoom Blvd. What is the plan for this please? Thank you .

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, June 22, 2020 7:25 AM
To: Courtney Brunell
Subject: Form Submission - New Form

This email originated outside the City of Lakewood.

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- helpdesk@cityoflakewood.us ext. 4357

Name: Stephen Myers

Email: col.stephen.myers@gmail.com

Message: Building the new forensic hospital adjacent to (within 100 meters of the school property) the existing Steilacoom High School is a very bad idea! Does the master plan consider this issue?

(Sent via WSHMasterPlan.org)

Courtney Brunell

From: Devin Scott <DEVIN94487@msn.com>
Sent: Thursday, June 11, 2020 12:28 PM
To: Courtney Brunell
Subject: RE: Western state proposal plan

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- helpdesk@cityoflakewood.us ext. 4357

Hi courtney

Thank you for responding

Sorry to add more but it seems the trouble shooter department spends a lot of time working on the fire alarm system and pa system due to system malfunction

Devin T Scott
(253)227-3110

----- Original message -----

From: Courtney Brunell <CBrunell@cityoflakewood.us>
Date: 6/11/20 08:53 (GMT-08:00)
To: Devin Scott <devin94487@msn.com>
Subject: RE: Western state proposal plan

Thank you Mr. Scott, I have received your comments and saved them to the project file. We appreciate your input and participation!

Sincerely,

Courtney Brunell

Courtney Brunell, MPA

Planning Manager

[City of Lakewood, WA](#)

(253) 983-7839

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From: Devin Scott [mailto:devin94487@msn.com]
Sent: Wednesday, June 10, 2020 11:03 PM

To: Courtney Brunell <CBrunell@cityoflakewood.us>

Subject: Western state proposal plan

Importance: High

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- helpdesk@cityoflakewood.us ext. 4357

Good evening,

I was reading an article on the hospital's proposed plan to renovate the whole hospital . I hope you take this time to read and really consider my feedback

As a current employee to the hospital my goal is to provide a safe an low stimuli environment as well as educate daily life challenges and goals.

My first suggestion Is that all nurses station are GLASSED and secured too many patients and reports document state patient climb over nurses station .

There should be no more double rooms as good as it produces social skills it posses to much of a threat when the hospital is barely staffed to census check the rooms . Patients should have their own room with a bed that is restraint ready this reduces the time of staff to patient violence, as well as doors that can be managed from the nurses station a very good example is wards forensic 1 and 2 in thee cfs building of three hospital

If our patients are going to be residing at the hospital for long periods of time we need safe structures to incorporate or resemble a community . A small park, track field . Yard outs for fenced patients should be equally sized to reduce biased. SIDEWALKS WE NEED SIDEWALKS

Lastly our pendants are not the best accurate when a code is called many times after pendants "ping" off other boxes that is not in our nearest location this system should be upgraded to a more up to date system

The hospital structure needs to remain consistent throughout the grounds to reduce the number of assualts as well as better storage and areas to prepare for medical epidemic like covid.

Devin T Scott
(253)227-3110

Courtney Brunell

From: Devin Scott <devin94487@msn.com>
Sent: Wednesday, June 10, 2020 11:03 PM
To: Courtney Brunell
Subject: Western state proposal plan

Importance: High

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Devin T Scott
(253)227-3110

Courtney Brunell

From: Devin Scott <DEVIN94487@msn.com>
Sent: Sunday, June 14, 2020 1:41 PM
To: Courtney Brunell
Subject: RE: Western state proposal plan

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- helpdesk@cityoflakewood.us ext. 4357

Hi courtney,

I was thinking about recent safety risks at the hospital and see about how we can reduce the ligature risk of the hospital (i.e. showers fire sprinkler system)

In these new competency restoration program . All Classrooms should have a safety bulity projector and screens to accomadate those with ASL needs as well.

All wards that have patient care should have digital clocks inside the walls will a screen protector instead of the regular analog clog it can be easily used as a weapon.

Each ward should have an relliable PA system that can go throughout the wards as well as to patient roo. For better communication.

Wards should have at least 2 staff bathrooms.

An office for each treatment team member if there is more than one of the same in the treatment team they can share offices.

I guess i just can't honestly stress the need for more space

Thank you

Devin T Scott
(253)227-3110

----- Original message -----

From: Courtney Brunell <CBrunell@cityoflakewood.us>
Date: 6/11/20 12:31 (GMT-08:00)
To: Devin Scott <DEVIN94487@msn.com>
Subject: RE: Western state proposal plan

No problem at all. I will add this to the record. We encourage and welcome all comments.

-Courtney

From: Devin Scott [mailto:DEVIN94487@msn.com]
Sent: Thursday, June 11, 2020 12:28 PM
To: Courtney Brunell <CBrunell@cityoflakewood.us>
Subject: RE: Western state proposal plan

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- helpdesk@cityoflakewood.us ext. 4357

Hi courtney

Thank you for responding

Sorry to add more but it seems the trouble shooter department spends a lot of time working on the fire alarm system and pa system due to system malfunction

Devin T Scott
(253)227-3110

----- Original message -----

From: Courtney Brunell <CBrunell@cityoflakewood.us>
Date: 6/11/20 08:53 (GMT-08:00)
To: Devin Scott <devin94487@msn.com>
Subject: RE: Western state proposal plan

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Sincerely,

Courtney Brunell

Courtney Brunell, MPA
Planning Manager
[City of Lakewood, WA](#)
(253) 983-7839
Like us on [Facebook](#)
Follow us on [Twitter](#)

From: Devin Scott [<mailto:devin94487@msn.com>]
Sent: Wednesday, June 10, 2020 11:03 PM

To: Courtney Brunell <CBrunell@cityoflakewood.us>

Subject: Western state proposal plan

Importance: High

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- helpdesk@cityoflakewood.us ext. 4357

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The hospital structure needs to remain consistent throughout the grounds to reduce the number of assualts as well as better storage and areas to prepare for medical epidemic like covid.

Devin T Scott
(253)227-3110

Courtney Brunell

From: Nicki Trahan <ntrahan415@gmail.com>
Sent: Thursday, June 11, 2020 8:59 AM
To: Courtney Brunell
Subject: comments regarding Western State Hospital

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- helpdesk@cityoflakewood.us ext. 4357

Hello,

My husband and I are property owners in the 98498 zip code, and we are very concerned that Western State Hospital is considering treating patients who have gone through the criminal justice system.

These patients are often quite violent, and the hospital is located in a residential area. We are very worried that the safety of nearby residents would be compromised, and I hope the city has some serious plans to address this issue.

Thank you,
Nicole and Mark Trahan

Courtney Brunell

From: Squarespace <no-reply@squarespace.info>
Sent: Thursday, July 9, 2020 9:15 AM
To: Courtney Brunell
Subject: Form Submission - New Form

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- helpdesk@cityoflakewood.us ext. 4357

Name: Eric A Vonderscheer

Email: evonders@comcast.net

Message: Feed back on Master Plan 9 July 2020

My first comment is that the public comment period appears to be inappropriately short for public openness, transparency and adequate time for the local communities affected by this master plan to consider, comment and discuss in the current pandemic we are undergoing. The current pandemic restrictions on public gathering and briefings prohibit previous means of public discourse on this critical public health issue. The public comment period should be extended for at least 3 additional months with adequate public communication to solicit feedback from across the communities effected by this master plan.

Specific concerns with the state DSHS master plan for distributed mental health facilities and the new forensic hospital within the current Western State Hospital (WSH) campus are outlined below.

As highlighted in other public comments, the proximity of the forensic hospital to the Steilacoom park, two high schools, an elementary school and a community college should be reconsidered and weighted appropriately in siting the forensic mental health hospital on the existing WSH campus. This is a public safety issue which is not adequately addressed in the master plan.

As outlined in the master plan there is resistance and a lack of public acceptance in Lakewood and Peirce county for additional expansion of mental health services in hospital and clinic treatment areas. This factor is one of the consultant's criteria for planning and scoring the placement of facilities. Historically Lakewood and Peirce County has had to litigate in attempt to remedy the unfair concentration of mental health facilities for the state within Peirce county and Lakewood.

The master plan does not provide adequate details how the forensic hospital will address the reintegration of patients back into society. This would again unfairly assign Lakewood and Peirce County with higher concentration of patients convicted of criminal offences out of proportion of population. Again being saddled with the additional costs of responding, securing both the forensic hospital but also effecting Lakewood and Peirce county residences police and security services. The area of security of the hospital patients, hospital staff and local communities is inadequately addressed in the master plan.

An additional section needs to be added that addresses how 300 forensic committed patients are planned to be reintegrated into society and how it would be accomplished without unfairly impacting the local communities housing the mental health facilities. The addition needs to address security, impacts to local police resources, impact to housing areas and acceptance of additional mental health patients with a community.

A small example is lack of police response. The Lakewood Police department is underfunded and short staff to respond to all incidents. It appears that police assets have responded distortional to incidents at the WSH which has directly impacted on their ability to serve and respond to citizens' needs and calls. The Lakewood police

were unable to respond an assault in Oakbrook housing area due to inadequate officers. The police response was prioritized which meant an officer was dispatched to take reports 5 hours after the incident. The addition of the 300 bed forensic hospital will unfairly impact services to Lakewood citizens.

The Master plan does not adequately address how security and impacts of a forensic hospital would be addressed in the community it would be sited in. Additional work needs to be done to address this shortfall.

Continuing on this topic within the master plan, the integration and transition of patients from both the forensic facility and the civil commitment facilities back into the community is not adequately detailed out. How will 350 bed patient pool and a 48 bed civil commitment facility density be absorbed into the community safely and reducing the impact on the City of Lakewood and communities where the facilities are sited. The Oakbrook housing area has a significantly high level of group homes and to have an increase of ½ way house to allow patients to transition would be an additional unfair burden on the city of Lakewood and the housing community around WSH. As the City of Lakewood Community & Economic Development: Additional siting Criteria for Mental Health Facilities- LMC 18A.40.060.B.4 has Section F: The safety of the general public as well as workers at and visitors to the facility is ensured. This part of the master plan is inadequate and needs to be expanded and address for the communities the facilities would be sited.

The safety for both the patients and general public must be considered. The response of “Security will be enhanced, with secured entrance to facilities for patient care and overall site security. See pp. 36-37 in the master plan report. “ is an inadequate response.

This part of the master plan is inadequate and vague. It does not address how the full recovery and reintegration is planned for a density of patients that is projected. If not adequately addressed it would have an unfair impact on the communities housing the mental health facilities. If sited in the Lakewood and Peirce County communities, it would be unfairly impacting this community which has historically been impacted.

The master plan is a good first step. It addresses the lack of mental health facilities state wide. However the master plan must adequately address the political and financial realities of the implementing fairly across the state so that Lakewood and Peirce County are not proportionally assigned a higher concentration and burden of forensic and civil commitment facilities without adequate planning for security and reintegration of patients into society.

The master plan failed to consider another alternative, siting of the forensic hospital on McNeil Island. There is already a mental health facility on the island. The island is a state resource, it is isolated from communities, a previous location for individuals who have committed criminal offenses. Existing facilities exist and maybe able to be modified to meet the needs of a forensic hospital. Siting on the island would address the issues of security and fairness. Admittedly it may not be a perfect fit solution but it utilizes existing state investment and does not adversely affect communities.

The placement of treatment facilities in Lakewood and Peirce county must be tied to the successful funding and approval of treatment facilities in other locations spread across the state. If treatment facilities placement meeting the current governor and DSHS’s master plan are funded and approved, implying successful implementation of the master plan, this would result in reduction of civil commitment facilities being concentrated on the WSH campus and unfairly impacting Lakewood and Peirce County over a spectrum of impacts to the citizens of Lakewood and Peirce County.

The reduction of civil commitment beds on the WSH campus and movement of facilities to other locations in the state should be tied to any additional facilities being sited on campus.

The master plan is a good start for addressing mental health care in Washington state. However it must be amended to address current shortfalls in security, integration of patients back into society, impacts to the communities housing the mental health facilities.

Mental health care has been and is marginalized as reflected in the homeless and drug addiction that is spread across the state and nation. There is a lack of resources and a willingness to address this problem. Society and citizens are hesitant to accept facilities in their neighborhoods. This has resulted in concentrating it in one or two locations. If not adequately funded this trend will continue. This will result in penalizing and impacting Lakewood and Peirce County unfairly.

Our society has not yet identified adequate means to address the mental health crisis in our society. Our society has not adequately funded this issue along with a multitude of other areas of society's issues that need to be address. As stated previously, the DSHS mater plan is a good first step to start the discussion on how we as a society will take on this issue.

Thank you for the opportunity to respond and comment on the plan as outlined. I look forward to the open and transparent decision process on where to site appropriately increased local health treatment facilities.

(Sent via WSHMasterPlan.org)



Glen Tallman Why not use McNeil Island?? ...

Like · Reply · 1w



Jeff Cota From what I have read this will replace the current hospital and long term reduce the overall number and type of patients. It would be built in or near the existing site and not south of Steilacoom Blvd in the park space. The comment period has been open for a while - do not remember when I first saw it posted though it was at least 2 weeks ago.

Like · Reply · 1w



Marsha Crane Seems to me it would be better if they waited until they have developed a comprehensive new behavioral health plan. Hopefully a fully integrated dual diagnosis plan. Then they would have a far better idea of what they will actually need there.

Like · Reply · 1w



Rita Duncan Ricci Right in the middle of residential neighborhoods and our best park...

Like · Reply · 1w



Scott Hensley 3 days to comment huh?? Wow

Like · Reply · 1w



Benjamin Raznick Scott Hensley, crazy

Like · Reply · 1w



Em Cribb I'm not only a Lakewood resident for over 15 years, but am also an employee at WSH as well. The Hostpital is very much needed, and with the new building we can receive Federal funding again which in turn will be a win win for everyone.



Like · Reply · 1w



Jerilee Brixey **Em Cribb** the new building does not guarantee federal funding. We have to get past CMS survey, which we cant seem to do. #1 because of staffing. How do we staff another 350 beds? We cant even staff the hospital we have. People are losing their jobs, many of us furloughed. The construction should be put on hold until the budget crisis is figured out after COVID. Too much unknown to be worrying about building a multi million dollar new hospital. That will 200% likely go over budget before it's even opened....like ALL state projects.

Like · Reply · 1w



Em Cribb **Jerilee Brixey** I completely understand your worries, as I am also furloughed. I still believe the new building is key.

Like · Reply · 1w



Gary Duggins **Jerilee Brixey** I agree with the over budget part, but I think we need to go back to the old way and when a contractor is awarded a contract to build something at a certain cost and time frame they need to be held to that contract. No cost over runs. You bid a job and that is the cost period if you under bid to win the bid and can't preform you loose.



Like · Reply · 1w



David Shaffer Long over due

Like · Reply · 1w



Helene Nikki I support it being moved somewhere else!

Like · Reply · 1w



Jerilee Brixey I'd rather not furlough versus building more hospital. We cant even staff what we have.

Like · Reply · 1w



Veronica Niechajczyk Whatever it is needs better security. I couldn't believe when we first moved here that a facility that houses dangerous and unstable individuals doesn't have a fence around it.

Like · Reply · 1w



Maili Jonkman Richard Williams. Ck out the new plan 🙄

Like · Reply · 1w



Robert Sweetpea Vas I support this

Like · Reply · 1w



Fred Shackleford total wast of money. Lefty waste...

Like · Reply · 1w



Burke Long Fred Shackleford Care to explain? Let's see your argument.

Like · Reply · 1w



💎 Top Fan

Christopher Michael Escobedo Fred Shackleford , Lefty is for the People, this is for the police.

Like · Reply · 1w



Marcos H Lopez Is not the building dnd there is no new federal money at all. Fake news

Like · Reply · 1w



Tilton Hilton I have an idea. How about they use McNeil island? Since they're spending millions to reconstruct Western State, move it to the island, that way they can control who comes on and off...

Like · Reply · 5w



^ Hide 14 Replies

Most Relevant is selected, so some replies may have been filtered out.



Scott Moss **Tilton Hilton** second this idea.

Like · Reply · 5w



Christopher Reid This isn't in the proposal.

Like · Reply · 5w



Scott Moss **Christopher Reid** but the city asked for public comments.

Like · Reply · 5w



Christopher Reid **Scott Moss** I don't think it's through Facebook.

Like · Reply · 5w



Zak Kinneman McNeil doesn't belong to the state. Its federal property leased to the state.

Like · Reply · 5w



Deborah White **Tilton Hilton** McNeil Island should be returned to the family they took it from. Land theft never goes back to the owners.

Like · Reply · 5w



Stacy Samillano Yess , 🙌

Like · Reply · 5w



Keith Goldenberger II **Tilton Hilton** drug rehabilitation on McNeil thats the heart of the mental health problem in are state

Like · Reply · 5w



Gregg Gagliardi **Tilton Hilton** Any idea how extraordinarily expensive that would be? Ask the staff at the Special Commitment Center.

Like · Reply · 5w



Karen DeBoer Freeman Wheres ALL OF THIS MONEY GOING TO COME FROM? WE, THE FRONT LINE WORKERS DONT WORK FOR FREE! MAYBE THEYRE GOING TO GO TO TOTAL TRAVEL NURSE AND AGENCY NURSES. THAT WILL BE OUR RAISE AND THEN SOME!

Like · Reply · 5w



Keith Goldenberger II **Karen DeBoer Freeman** use of drugs like meth seem to set off mental illness back when I work there. I would say 8 out of 10 pts. Had drug problems.

Like · Reply · 5w

Like · Reply · 5w



Larry Thompson Zak Kinneman Correct, and since there is no prison active any more, the Feds have made noise about wanting it back. Local Native American Tribe has put a bid in also

Like · Reply · 5w



Karen DeBoer Freeman Keith Goldenberger II you may be right, Keith. There are very few who have zero drug hx but I also think some were trying to fix their own brains and were manic, paranoid, full of anxiety etc. But I see your point. I think its basically a genetic thing.....

Like · Reply · 4w



Karen DeBoer Freeman Keith Goldenberger II meth dies some wild things to the brain...no return trip sometimes.

Like · Reply · 4w · Edited



Kevin Sullivan A new building is not going to fix what's going on.

Like · Reply · 5w



Chris Pharo Kevin Sullivan They cant modernize the fire system in South Hall, so there's that. It's a major safety issue. I do hope they are able to keep central, though, which is an old building, but did not have the fire inspection issues.

Like · Reply · 5w



Larry Thompson It is worth mentioning that the big green area marked "OPEN SPACE ZONE" contains a golf course, a Frisbee Disc golf course and a fish hatchery and a protected stream..

Like · Reply · 5w



Fred Shackleford Nothing wrong with the old buildings. Plenty of room to build new too. But it takes smart people to get it done. Are there any smart people working for the government? We know the leadership's IQ 🤔

Like · Reply · 5w



Larry Thompson They are 2 old, 2 out of date and can no longer meet federal standards and JCOH codes. Decade in the making. Been patch together for years. Forensics is a court ordered expansion of beds. it is a growth industry. I retired from there after 15 years there. Plus time on McNeil. Not suitable from a rights perspective for the bulk of the population and the the cost to maintain was horrid with the Prison.

Like · Reply · 5w





Top Fan

Tim Tasse Make it modern and adequate.

Like · Reply · 5w



1



Larry Thompson And secure. And with current state of the art security. Not the patch work of systems that went to low bidders who then disappeared.

Like · Reply · 5w



1



Ethel Bell They need to fix the ones they have it looks like a haunted mansion. I have no problem with adding a hospital but upgrade repair this one maybe put in some garden space or park like setting for the patients.

Like · Reply · 5w



2



Larry Thompson I just retired from there. The old buildings are no longer able to meet federal and JACO standards, hence the new forensic. Also some court issues. Complex problem decades in the making.

Like · Reply · 5w



Ethel Bell **Larry Thompson** that's sad that they didn't maintain it

Like · Reply · 5w



Karen DeBoer Freeman **Ethel Bell** so refreshing to hear someone who wants a better atmosphere for help in healing their broken/injured brains.....and poor self esteem.

Like · Reply · 4w



1



Larry Thompson **Karen DeBoer Freeman** Yes. Ethel's ideas are good. I understood some plans to do just that in the QUAD area at one time, but those will be the areas of cuts for sure.

Like · Reply · 4w



1



Ethel Bell That's sad

Like · Reply · 4w



Robert Finch give the inmates some things to do to

Like · Reply · 5w



Larry Thompson They are not "Inmates" it is not a prison, nor part of the DOC. It is a hospital and run under DSHS/BHA. They are patients

Like · Reply · 5w · Edited



4



Karen DeBoer Freeman Larry Thompson 🙏thankyou, Larry... ...I think he meant well....but.....I hate that label.

Like · Reply · 4w



1



Robert Finch Larry Thompson

Like · Reply · 4w



Tyrone Walker Evans Floyd Robert Finch smh lol Washington i swear

Like · Reply · 4w



Kate Russell Glad to hear it.

Like · Reply · 5w



Don Anderson
Mayor

Jason Whalen
Deputy Mayor

Mary Moss
Councilmember

Michael D.
Brandstetter
Councilmember

Patti Belle
Councilmember

Linda Farmer
Councilmember

Paul Bocchi
Councilmember

August 27, 2021

DSHS
Attn: Robert Hubenthal
1115 Washington Street SE
Olympia, WA 98504
Email: robert.hubenthal@dshs.wa.gov

RE: LU-20-00027 Western State Hospital Master Facilities Plan and LU-20-00030 Western State Hospital SEPA Checklist

Site address: 9601 Steilacoom Blvd SW (APN#0220283026; -027; 0220031007; 0220321022)

Mr. Hubenthal,

The City of Lakewood appreciates the opportunity to process the Western State Hospital (WSH) Master Facilities Plan ("Plan") (LU-20-00027) and SEPA checklist (LU-20-00030). The City has completed the review of the resubmittal received on May 28, 2021, and requests the following information prior to issuing a threshold determination:

Clarification on the location of the future forensic hospital.

The City of Lakewood has received information that the proposed location of the future forensic hospital is expected to change from what is currently proposed. Amending the site plan at a future date will require additional public notice and a public hearing. To avoid confusion generated by amending the document so soon after adoption, the City requires that the applicant amend the site plan to reflect the new proposed location. The revised site plan will be used when advertising the public hearing for the Master Facilities Plan. A "bubble map" depicting a general location, and basic structural dimensions and numbers of floors of the future hospital will satisfy this requirement.

The City requires additional information pursuant to LMC 18A.40.060 B.2.f. Alternative Site Selection.

In considering this proposal, the City is required to examine the overall distribution of essential public facilities within greater Pierce County to avoid placing an undue burden on any one community. The current alternatives analysis is insufficient because it does not examine other sites within greater Pierce County, and the City does not have sufficient information to otherwise satisfy this criteria.

Therefore, the applicant is required to amend the existing alternative analysis to fully comply with the referenced code section. Please clarify the source and methods of the evaluation criteria. Identify Pierce County Countywide planning policies, Lakewood

Comprehensive Plan policies, and Lakewood Municipal Code sections that have relevancy to alternative site locations. For each alternative site, identify service demands, mitigation, and financial and fiscal benefits.

The City requires additional information pursuant to LMC 18A.40.060.B.2.g. Distribution of Essential Public Facilities.

The Lakewood Municipal Code requires that the City evaluate the overall distribution of essential public facilities within greater Pierce County to avoid placing an undue burden on any one community. Knowing that the long term goal is to transition civil commitments out of Western State Hospital and into an alternative facility, the City requires additional information about the proposed transition and its impact to the Lakewood Community and greater Pierce County. Please respond to the following questions:

- What is the criteria for transitioning a patient out of Western State Hospital and into an alternative residential setting?
- What is the projected schedule to relocate Western State Hospital patients to other residential settings? Is the relocation process already underway? What happens if there are not sufficient facilities to relocate Western State Hospital patients?
- In the last three-years, 2019 through 2021, how many former Western State Hospital patients transitioned into alternative treatment facilities, including essential service facilities and/or adult family homes in the City of Lakewood?
- Likewise, in the last three-years, 2019 through 2021, how many former Western State Hospital patients transitioned into alternative treatment facilities, including essential service facilities and/or adult family homes in incorporated Pierce County cities (minus Lakewood), and unincorporated Pierce County?

Public Services

The SEPA Checklist does not indicate the basis for the determination that there will be no increase in demand for emergency services. While it appears the facility will have its own on-site security, what level of security is planned? Will such on-site security also include fire and emergency medical services? If not, what plans are there to provide fire and medical emergency services?

Cultural Resources

The referenced studies in the SEPA checklist are at least 10 years old. Have the studies been reviewed by DAHP (Washington State Department of Archeology and Historic Preservation) and tribes?

- Western State Hospital Cultural Landscape Assessment (Artifacts Architectural Consulting, 2008)
- Western State Hospital Cultural Management Plan (Artifacts Architectural Consulting, 2011)

Disc Golf

The City has recently been made aware that the existing open space land north of the hospital campus is in the process of being leased to a new entity for disc golf. Would this proposed lease grant access to disc golf members and exclude/restrict public access? One “no trespass” sign has been placed on the property. Someone is mowing the grounds. Many pink marking flags have been installed throughout the site. The City has already received several inquiries from area residents. Please update the master

plan to provide information regarding access to the open space areas immediately adjacent to Western State Hospital.

If you have questions regarding the contents of this letter, please contact me at 253-983-7839 or cbrunell@cityoflakewood.us. All inquiries regarding permitting or permit submittal should go through permits@cityoflakewood.us.

Sincerely,


Courtney Brunell
Planning Manager

Attached: LMC 18A.40.060.B

CC:

David Bugher, City of Lakewood
Eric Ridendour, SRG Partnership
Aaron Martinez, DSHS

Attachment A: Mental health facility (B)(1), (B)(2), (B)(4) through (B)(11)

18A.40.060 B. Development and Operating Conditions.

1. RCW 36.70A.200 requires cities to include in their comprehensive plans a process for identifying and siting essential public facilities (EPFs). EPFs are described in the Growth Management Act (GMA) as those facilities which are typically difficult to site, but are needed to support orderly growth and delivery of services. The GMA states that no local comprehensive plan or development regulation may preclude the siting of essential public facilities.
2. Except for existing electrical transmission lines of higher voltage than 115 kV and military installations, essential public facilities shall require a conditional use permit. In addition to the regular conditional use permit review criteria, the following shall apply:
 - a. Documentation of Need. Project sponsors must demonstrate the need for their proposed EPFs. Included in the analysis of need should be the projected service population, an inventory of existing and planned comparable facilities and projected demand for this type of essential public facility.
 - b. Consistency with Sponsor's Plans. The proposed project should be consistent with the sponsor's own long-range plans for facilities and operations.
 - c. Consistency with Other Plans. The proposal must demonstrate the relationship of the project to local, regional and state plans. The proposal should be consistent with the comprehensive plan and other adopted plans of the prospective host community. In evaluating this consistency, consideration shall be given to urban growth area designations and critical area designations, population and employment holding capacities and targets, and the land use, capital facilities and utilities elements of these adopted plans.
 - d. Relationship of Service Area to Population. With the exception of linear transmission facilities, the facility's service area population should include a significant share of the host community's population, and the proposed site should be able to reasonably serve its overall service area population.
 - e. Minimum Site Requirements. Sponsors shall submit documentation showing the minimum siting requirements for the proposed facility. Site requirements may be determined by the following factors: minimum size of the facility, access, support facilities, topography, geology, and mitigation needs. The sponsor shall also identify future expansion needs of the facility.
 - f. Alternative Site Selection. The project sponsor shall search for and investigate two (2) alternative sites before submitting a proposal for siting review. The proposal shall indicate whether any alternative sites have been identified that meet the minimum site requirements of the facility. The sponsor's site selection methodology will also be reviewed. Where a proposal involves expansion of an existing facility, the documentation shall indicate why relocation of the facility to another site would be infeasible.

g. Distribution of Essential Public Facilities. In considering a proposal, the City shall examine the overall distribution of essential public facilities within greater Pierce County to avoid placing an undue burden on any one community.

h. Public Participation. Sponsors shall encourage local public participation in the development of the proposal, including mitigation measures. Sponsors shall conduct local outreach efforts with early notification to prospective neighbors to inform them about the project and to engage local residents in site planning and mitigation design prior to the initiation of formal hearings. The sponsor's efforts in this regard shall be evaluated.

i. Consistency with Local Land Use Regulations. The proposed facility shall conform to local land use and zoning regulations that are consistent with the applicable county-wide planning policies. Compliance with other applicable local regulations shall also be required.

j. Compatibility with Surrounding Land Uses. The sponsor's documentation shall demonstrate that the site, as developed for the proposed project, will be compatible with surrounding land uses.

k. Proposed Impact Mitigation. The proposal must include adequate and appropriate mitigation measures for the impacted area(s) and community(ies). Mitigation measures may include, but are not limited to, natural features that will be preserved or created to serve as buffers, other site design elements used in the development plan, and/or operational or other programmatic measures contained in the proposal. The proposed measures shall be adequate to substantially reduce or compensate for anticipated adverse impacts on the local environment.

4. Additional Siting Criteria for Mental Health Facilities – Purpose. The purpose of the public facilities master plan process is to encourage essential public facilities civic uses on large parcels of land to be developed holistically, with internally compatible uses and physical development and with accommodations made for natural site and environmental conditions, assuring that:

- a. Appropriate provisions are made for water, sanitary sewer, drainage ways, utilities, roadways, emergency services, and any other applicable infrastructure or services;
- b. Critical areas will be protected;
- c. Usable open space will be provided;
- d. Appropriate provisions are made for motorized and nonmotorized transportation circulation, including sidewalks and other planning features that assure safe walking conditions for students who walk to and from school;
- e. Approval criteria and mitigation measures are established which include general design elements and linkage components; and
- f. The safety of the general public as well as workers at and visitors to the facility is ensured.

5. Applicability.

A public facilities master plan is required for all essential public facilities civic uses which utilize contiguous parcels of land totaling twenty (20) acres or more and which are zoned Public/Institutional.

Exemption from a Public Facilities Master Plan. A public facilities master plan is not required for installation of portable classrooms as approved by the Director subject to Process Type I administrative action; permitted uses in the PI zoning district; renovations, remodeling and general maintenance, provided there is no expansion in occupiable space greater than one thousand (1,000) square feet of the structure proposed for renovation/remodeling; roof repairs; infrastructure improvements to existing systems (e.g., interior streets; sidewalks; lighting; security equipment; landscaping; and storm water, sewer, water, and power utilities); emergency repairs; and installation of fire/life safety equipment).

6. Uses. Uses not included in an approved public facilities master plan, except those listed in subsection (B)(5) of this section, shall not subsequently be allowed upon the site except by review and approval of an amended public facilities master plan following the same process as establishment of an initial public facilities master plan.

When a new essential public facility civic use is proposed which requires a public facilities master plan or amendment to an existing plan and it is located on the same property or site of an already established essential public facility civic use, the City shall require the project proponent to prepare a compatibility study which, at minimum, contains the following information on a form prescribed by the City:

- a. The purpose of the proposed essential public facility civic use;
- b. An operational characteristics description of the proposed essential public facility civic use and an operational characteristics description of the existing use or uses;
- c. An evaluation of the potential effects of the proposed essential public facility civic use upon the existing use or uses;
- d. An evaluation of the potential effects of the proposed essential public facility civic use upon the adjacent properties;
- e. An evaluation of the potential effects of the proposed essential public facility civic use upon at-risk or special needs populations, including but not limited to children and the physically or mentally disabled; and
- f. Identification of any applicable mitigation measures designed to address any potential effects identified through the evaluation required herein.

7. Previous Permits. A previously adopted public facilities permit issued under Pierce County predating City incorporation, or a previously adopted administrative use or other permit issued pursuant to LMC Title 18 or 18A after City incorporation, may constitute an adopted public facilities master plan for the purposes of fulfilling the requirements herein. Any subsequent amendment(s) sought to an existing public facilities permit shall follow the process for a public facilities master plan.

8. Process. A public facilities master plan shall be reviewed as a Process Type III permit under LMC 18A.20.080.

9. Termination and Expiration of Approval. If a condition of approval is violated, or if any provision of this code is violated, the Director may, in his sole discretion, initiate a revocation of the public facilities master plan which shall require a public hearing before and decision by the Hearing Examiner. Nothing

in this section shall limit or affect the revocation of building permits, issuance of stop orders or other similar proceedings authorized by this code.

Recognizing that the nature of essential public facilities often requires approval of significant capital appropriations and that the appropriations process may be unpredictable, a public facilities master plan typically would not expire unless and until the slate of projects to be completed thereunder has been substantially completed, and new projects that are not included in the scope of the public facilities master plan are proposed. In such case, the proponent shall undertake an update which shall follow the same process as an initial public facilities master plan.

10. Discontinuance of Public/Institutional and/or Essential Public Facilities Civic Use. When a public/institutional and/or an essential public facilities civic use has been discontinued for a period of six (6) or more months, the use of land and/or structure(s) shall be considered discontinued. In the event of discontinuance, the public/institutional and/or essential public facilities civic use shall be demolished in accordance with the provisions of the International Building Code.

11. Adaptive Reuse. In the event that a public/institutional and/or an essential public facilities civic use is proposed for adaptive reuse, where buildings/structures are repurposed for viable new uses and modern functions, other than those originally intended, to address present-day needs, a public facilities master plan is required. Adaptive reuse does not constitute an exemption from a public facilities master plan as is outlined in subsection (B)(5) of this section. [Ord. 738 § 2 (Exh. A), 2020; Ord. 726 § 2 (Exh. B), 2019.]