



CITY OF LAKEWOOD
COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT

REPORT AND RECOMMENDATION TO THE HEARING EXAMINER
Western State Hospital Master Facilities Plan (LU-20-00027)

PROJECT INFORMATION

Project: Western State Hospital Master Facilities Plan
File Number: LU-20-00027
Location: 9601 Steilacoom Blvd SW
Assessor's Parcel No.: 0220321022, 0220283027, 0220321007, and 0220283026
Comprehensive Plan: Public Semi-Public Institutional and Open Space & Recreation
Zoning District: Public Institutional and Open Space & Recreation 1
Applicant: Department of Social and Health Services (DSHS)
Robert Hubenthal
PO Box 45848
Olympia, WA 98504
Agent: SRG Partnership
Eric Ridenour
621 SW Columbia Street
Portland, OR 97201
Public Hearing: July 27, 2022 at 9:00 a.m.

PROJECT DESCRIPTION SUMMARY

The State Department of Social and Health Services (DSHS) has proposed a complete reconstruction of Western State Hospital and its campus through an update to the 1999 Western State Hospital Master Facilities Plan. The proposed master plan update proposes an expansion of the hospital capacity, including:

1. A new 350-bed forensic hospital on the property. This will require the demolition of several existing buildings on site.
2. A new 18-bed residential cottage at the Child Study and Treatment Center.
3. A new community residential treatment facility (RTF) of 48 beds, contingent on completion of a parallel study to site community facilities throughout the region.

Long term, the state's goal is to transition the hospital to serve primarily forensic patients and fewer civil commitment patients, which make up the majority of the approximately 850 patients on site today. To support the new buildings, infrastructure and circulation improvements are also included in the proposal.

A. SUMMARY OF RECORD

See the list of exhibits provided in Section H, which includes the submittal plans and documents received for processing the application (Exhibits 1 – 16).

B. FINDINGS OF FACT

Staff recommends that the following Findings of Fact be adopted for this project:

Property and Proposal Details

1. Washington State Department of Social and Health Services has applied for an update to the existing 1999 Western State Hospital (WSH) Master Facilities Plan. The primary intent of this update is to comply with federal and state standards for the care of mental health patients. State policy looks to distribute services for civil commitment patients throughout the state, so that patients can be near family and community support. 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. To accomplish this, the Master Facilities Plan update reconfigures the physical layout of the campus, incorporating a more compact footprint, and includes the construction of new buildings that are better suited to an updated model of care and changing patient population.
2. The subject site is 288.34 acres in size and is comprised of four tax parcels (0220321022, 0220283027, 0220321007, and 0220283026). The subject site is currently used as the campus for both Western State Hospital and the Child Study and Treatment Center and is adjacent to Steilacoom High School to the West, Fort Steilacoom Park to the South, and residential housing to the North and East. A site context and surrounding uses map (see figure 6) is included in the 2020 WSH Master Facilities Plan (2020 Master Facilities Plan).
3. Tax parcel 0220321022 is 215.71 acres in size and located in the Public / Institutional zoning district. The existing WSH campus is primarily located on this parcel. The parcel is largely developed with a ravine between the existing Western State Hospital and the former Fort Steilacoom golf course. The eastern are of the property includes oak woodlands, disc golf course, and a recreational field.
4. Tax parcels 0220283027, 0220321007, and 0220283026 total 72.63 acres in size and are located in the Open Space & Recreation 1 zoning district. These parcels include recreational play fields, former Fort Steilacoom golf course, and areas used as a disc golf course (not DSHS use).
5. The 2020 Master Facilities Plan calls for a new 350-bed forensic hospital and a new 18-bed residential cottage at the Child Study and Treatment Center (CSTC), as well as a treatment and recreation center. The 2020 Master Facilities Plan will also allocate space for a new community residential treatment facility (RTF) of up to 48 beds and a Historic Fort Visitor Center that will be operated by the Historical Fort Steilacoom Association. In addition to the construction of the above mentioned buildings, the 2020 Master Facilities Plan includes the following:
 - a. The expansion of or additions to Buildings 50, 51, and 54 (Child Study & Treatment Center facilities) and Building 29 (Gymnasium addition),
 - b. The renovation of Buildings 17, 19, 20, 28, and 29, and
 - c. The demolition of seventeen (17) outmoded building as indicated in Figure 20 and summarized in Table 8 in the 2020 Master Facilities Plan.

In total, the total building square footage for the WSH campus will increase by approximately 252,326 square feet, the total bed count and capacity counts are outlined in tables 1 and 2 of the Master Plan. The existing bed count shall not exceed 925 beds and the existing capacity shall not exceed 1,011 during the 2020-2031 master plan cycle. The 2020 Master Facilities Plan will also include improved circulation, parking expansion, and utility upgrades to match the new compact building footprint. The master development plan is provided on page 26 (figure 17) of the 2020 Master Facilities Plan.

6. The planning horizon for the 2020 Master Facilities Plan is ten (10) years from its approval date. All proposed demolition, construction, and other improvements listed in the 2020 Master Facilities Plan are anticipated to be completed within this timeframe.
7. Two independent facilities (West Pierce Fire & Rescue Station and Oakridge Community Facility) located at the eastern edge of the Western State Hospital campus, and facing 87th Avenue SW, are leased lands that are not part of this Master Facilities Plan update.
8. The existing Western State Hospital is an Essential Public Facility as defined by the State – the 2020 Master Facilities Plan would not change the use of the campus, and it is being developed on a site zoned for public and institutional uses by the City. The Western State Hospital is defined in the Lakewood Municipal Code with an array of facilities including mental illness and forensic facilities as well as child study and treatment center (LMC 18A.10.180 – Definitions “W”). Mental health facilities are classified as a conditional use in the Public/Institutional zone (LMC 18A.40.060 A). Civil commitment and forensic commitment hospitals are considered mental health facilities. As such, there are no proposed change of uses associated with the 2020 Master Facilities Plan.
9. The 2020 Master Facilities Plan includes revision to site access, circulation, and parking. The 2020 Master Facilities Plan denotes these changes on the circulation and parking plan (see figure 21). The 2020 Master Facilities Plan update provides one new drive entry off Steilacoom Blvd. SW and modifies the most eastern driveway along Steilacoom Blvd. SW. In total the WSH campus will have four access driveways off Steilacoom Blvd. SW, one controlled access and one public access driveways off Sentinel Dr., and one driveway off 87th Avenue SW that will provide for both public and controlled access. The internal roadways have been configured to match the new compact layout of the campus and improve circulation. The 2020 Master Facilities Plan includes the demolition of six (6) parking lots, modifying two (2) parking lots, the expansion of one (1) parking lot, and the construction two (2) new parking lots. In total, the 2020 Master Facilities Plan provides for 2,045 parking spaces, which is a net of 447 parking spaces from the current condition. The details of the parking changes are provided in table 10 of the 2020 Master Facilities Plan.
10. According to the SEPA, the subject site is primarily upland terraces with slopes less than 15 percent. The overall topography slopes gently from southeast corner to the northwest corner. The forested valley to the north and south of the former golf course contains slopes of up to seventy percent (70%) slope. Individual projects under the 2020 Master Facilities Plan may be required to conduct site specific field studies to identify sensitive species and habitats and evaluate potential impacts associated with the proposed development activities depending on the project location. (Condition 3)

11. A Natural Resource Evaluation dated February 7, 2022 prepared by PBS was submitted with the 2020 Master Facilities Plan (Appendix 5). This report identified the following resources:

- a. Wetland and Streams: The subject site contains two documented wetlands and two streams. The Open Space and Landscape sections of the 2020 Master Facilities Plan denotes these resources on the Landscape & Open Spaces map (Figure 23) as sensitive lands / steep slopes and states that no development is proposed in these areas.
- b. Fish and Wildlife Habitat: There are five (5) critical fish and wildlife species and habitats on the WSH campus. The 2020 Master Facilities Plan retains approximately 48 acres of wildlife habitat in its current condition, which includes Oregon White Oak, wetlands, streams, and riparian areas on or adjacent to the campus.

This Natural Resource Evaluation level of effort is consistent with a reconnaissance level analysis. As such, individual projects under the 2020 Master Facilities Plan may be required to conduct site specific field studies to identify sensitive species and habitats and evaluate potential impacts associated with the proposed development activities depending on the project location. (Condition 3)

12. The WSH campus has oak tree stands that have been identified in Figure 23 of the 2020 Master Facilities Plan. All facilities anticipated in the 2020 Master Facilities Plan have been sited to reduce impact on the oaks (pp. 39). The 2020 Master Facilities Plan further requires site-specific designs to be prepared that try to avoid development of hardscape and building footprints under the drip line of the oaks (pp. 40). This plan further requires that irrigation plans for future landscape should avoid over-watering the oak root zone (pp. 40). The SEPA MDNS (Exhibit 13) reviewed the potential impacts to significant vegetation and provided additional mitigation measures that will need to be incorporated with each individual project. (Condition 1)
13. According to SEPA, the 2020 Master Facilities Plan anticipates that storm water from the improvements will be infiltrated on site. The City's Public Works Department will review drainage plan for compliance with storm water requirements with each individual project. (Condition 1)
14. According to the 2020 Master Facilities Plan, the WSH grounds and surrounding area are listed on the National Register of Historic Places (NRHP) and Washington Heritage Register (WHR) as the Fort Steilacoom Historic District. Several structures that are proposed for demolition in 2020 Master Facilities Plan that are listed in the NRHP listing. These structures are identified in existing facilities maps (see figures 11 and 12) and detailed under the Documentation of Listed Structure section of the 2020 Master Facilities Plan (pp. 31). The SEPA MDNS (Exhibit 13) provides mitigation measures that mitigate the potential impacts the 2020 Master Facilities Plan has on cultural resources. (Condition 1)
15. DSHS will work with potentially affected utilities to ensure that utility service is not affected during construction and that access for utility maintenance is maintained at all times.
16. As part of the 2020 Master Facilities Plan, DSHS will pursue the transfer of the WSH water system including physical assets, wells, and water rights existing on-campus to the Lakewood Water District,

who will provide future water services to the WSH campus. In the meantime, the new forensic hospital will connect directly to the Lakewood Water District for its domestic water source.

17. Pursuant to Pierce County Sewer comments dated July 23, 2020 (Exhibit 12), the Water and Sanitary Sewer sections of the Master Plan should include near-term improvements to water use monitoring in the facility. Good water usage data will support water conservation and improve sewer demand estimates throughout the implementation of the Master Plan.
18. As require by Executive Order 18-01, signed by Governor Inslee, all new facilities or major renovations within the 2020 Master Facilities Plan will be developed be designed to be zero energy or zero energy-capable as noted in the Utilizes and Infrastructure section of the 2020 Master Facilities Plan .
19. A Traffic Impact Analysis dated January 31, 2020 prepared by Transportation Solutions, Inc. was submitted with the 2020 Master Facilities Plan (Appendices 3A and 3B). This analysis indicates a long-term decrease in vehicle trip generation at the site, resulting in approximately 6% fewer weekday AM and PM peak hour trips compared to current conditions. Short-term (1-5 years), weekday AM and PM peak hour trips would increase by approximately 7% over current conditions. All affected intersections would operate at LOS D or better in both the short and long-term, with the exception of the CSTC Entrance on Steilacoom Blvd SW, which currently operates at LOS F at AM peak and LOS E at PM peak, and the Chapel Gate Drive entrance, which is projected to degrade from its current PM peak LOS D to LOS E under all future scenarios. The Traffic Impact Analysis indicates that the projected LOS impacts could be mitigated through intersection improvements, such as signalization or widening of Steilacoom Blvd SW. As detailed in the SEPA MDNS (Exhibit 13), the proponent should coordinate all future campus entrance reconfigurations with the City. (Condition 1)
20. Consistency with the City of Lakewood’s Public/Institutional Zoning designation, new facilities developed at the WSH campus will follow provisions of the City of Lakewood’s Development Standards (LMC 18A.70.A “Community Design, Landscaping and Tree Preservation, Commercial Uses and Zones”), except where provisions are explicitly overridden by the 2020 Master Facilities Plan. Exceptions to Community Design, Landscaping & Tree Preservation Standards provided on page 29 of the 2020 Master Facilities Plan, includes:
 1. Heights and Setbacks for development under this master plan shall comply with “Table 7: Height Limits & Setbacks, New Construction”.
 2. Development at WSH shall follow the tree preservation goals to the greatest extent feasible while meeting project needs. See “Tree Retention & Protection” on page 39 for objectives specific to this master plan.
 3. The design of facilities shall follow contemporary best practices for architectural design, scale and composition, including placemaking, sustainable design and daylighting. This approach is in lieu of prescriptive requirements of 18A.70.040.2.

| Table 7: Height Limits & Setbacks, New Construction | |
|--|---------------------------------------|
| Maximum Height of New Construction | Upto 5 stories, and less than 100 ft. |
| Minimum Setbacks from Street Frontages | |
| Steilacoom Boulevard SW | 75 ft. |

| | |
|--|---|
| Sentinel Dr. | 100 ft. |
| 87th Avenue SW (no projects proposed along this frontage at this time) | General alignment with existing structures, 45 ft +/- |

21. Building, Plumbing and Mechanical permits shall be required through the City of Lakewood prior to construction of any buildings. The applicant shall also obtain permits/approvals from all outside agencies with jurisdiction prior to construction activities or site improvements. (Condition 4)
22. Site Development permit and Drainage Review will be required for every new project. The City’s Public Works Department will review civil plans for consistency with state and local regulations for temporary and permanent erosion and sediment control, as well as storm water quality/quantity treatment. (Condition 5)

Procedural Requirements:

23. A Notice of Complete Application was issued on May 26, 2020. (Exhibit 9)
24. A Notice of Application was published on June 10, 2020, in the Tacoma News Tribune, posted on the City of Lakewood website, posted on site, and mailed to all property owners within 1,000 feet of the project (Exhibit 10). The notice requested a SEPA pre-threshold consultation from the public and agencies. At the conclusion of the comment period, the City issued a correction letter on July 21, 2020. A revised Master Plan application and revised SEPA checklist were submitted to Lakewood in May, 2021. The City reopened public comment on both documents between June 7th and July 12, 2021.
25. SEPA Mitigated Determination of Non-significance (MDNS) was issued on June 6, 2022. The SEPA DNS appeal deadline was June 27, 2022 and no appeals were filed. (Exhibit XX)
26. A Notice of Public Hearing was issued on June 27, 2022 in the Tacoma News Tribune, posted on the City of Lakewood website, posted on site, and mailed to all property owners within 1,000 feet of the project. (Exhibit 16).
27. Per LMC 18A.40.060.B.5, a public facilities master plan is required for all essential public facilities civic uses which utilize contiguous parcels of land totaling twenty (20) acre or more and which are zoned Public/Institutional. Per LMC 18A.40.060.B.8, a public facilities master plan shall be reviewed as a Type III permit. The public facility master plan review criteria is outlined in LMC 18A.40.060.B.2. Mental health essential public facilities are also subject to LMC 18A.40.060.B.4.a through 18A.40.060.B.4.f. These review criteria are further discussed in Section D.2, D.3, and D.4 below.

C. PUBLIC AND AGENCY COMMENTS

On June 10, 2020 the City of Lakewood issued a notice of application on both the proposed update to the Western State Hospital Master Facilities Plan and the SEPA Checklist. At the conclusion of the comment period, the City issued a correction letter on July 21, 2020 (Exhibit 14). A revised Master Plan application and revised SEPA checklist were submitted to Lakewood in May, 2021. The City reopened public comment on both documents between June 7th and July 12, 2021. On June 27, 2022, the City of Lakewood issue a Public Hearing Notice for July 27, 2022. This notice allows written comments to be submitted by 5pm July 26, 2022. The below summary includes all comments received during the notice of application and notice of public hearing up to July 15, 2022. Any comments provided between July 16, 2022 and July 26, 2022 will be presented to the Hearing Examiner as a new exhibit.

1. Public Comments

The City received 119 public comments during the public comment periods. The public comments are summarized in Exhibit 11.

2. Agency Comments

The City received 15 agency comments from the following agencies:

- City of Fife dated June 29, 2020
- Lakewood Chamber of Commerce dated July 9, 2020
- Lakewood Police Department dated July 17, 2020
- City of University Place dated July 10, 2020
- Disability Rights of Washington dated July 9, 2020
- Historic Fort Steilacoom Association dated June 25, 2020
- Tacoma Pierce County Health Department dated July 1, 2020
- Town of Steilacoom dated July 13, 2020
- Washington Department of Archaeology & Historic Preservation dated July 8, 2020
- Washington State Department of Ecology dated July 9, 2020
- Puget Sound Energy dated July 17, 2020
- Pierce County Sewer Utility dated July 23, 2020
- Washington State Department of Ecology (2nd comments) dated July 7, 2021
- Puget Sound Clean Air Agency dated July 7, 2021
- Pierce Transit dated July 7, 2021

The agency comments have been combined and provided in Exhibit 12.

The public and agency comments played a significant role in ensuring the 2020 Master Facilities Plan community compatibility. The city reviewed all public and agency comments from the notice of application comment period and issued an eleven (11) page correction letter on July 21, 2020. The correction letter and public comments led to the 2020 Master Facilities Plan being revised and resubmitted in May 2021. The city reopened the public comment period and partnered with DSHS on two public meetings that were held on August 31, 2021 and September 9, 2021. The city reviewed all public comments and issued a second correction letter on August 27, 2021. The 2020 Master Facilities Plan was revised again and resubmitted on April 18, 2022 (Exhibit 2). The city issued correction letters are provided in Exhibit 14. The applicant's response to correction letter is provided in Exhibit 4.

D. CONSISTENCY WITH CITY OF LAKEWOOD COMPREHENSIVE PLAN

The master facilities plan area is located within the Public & Semi-Public Institutional and Open Space & Recreation comprehensive plan land use designations (see Comprehensive Plan, Figure 2.1). The Public and Semi-Public Institutional land-use designation provides for large and moderate scale governmental uses, special districts, and semi-institutional uses. The designation allows for the specialized needs of providing public services to all areas of Lakewood. Additionally, The master facilities plan area is located in the Fort Steilacoom / Oakbrook Center of Local Importance (CoLI), which recognizes the role of civic facilities such as the hospital, Pierce College - Fort Steilacoom, and the historic Fort Steilacoom lands, among other uses, (see Comprehensive Plan, Section 1.7, Figures 2.3 and 2.5). The Comprehensive Plan provides the historical context of the Western State Hospital and provides for the following comprehensive policies support for the proposal (see Comprehensive Plan, Section 3.9):

- GOAL LU-40: Recognize the unique nature of federal patent lands at Western State Hospital and Fort Steilacoom Golf Course.

- 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 confirming 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.

Staff Analysis: The 2020 Master Facilities Plan and proposed essential public facilities are consistent and compatible with the intent of the goals, objectives and policies of the Comprehensive Plan.

E. CONSISTENCY WITH CITY DEVELOPMENT REGULATIONS

The following sections present staff analyses for consistency review. All referenced conditions of approval are located in Section G.

1. Public Facilities Master Plan Require Information:

Subject to LMC 18A.40.060.B.6, 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 (*applicant responses are provided verbatim as provided on page 6 of the 2020 Master Facilities Plan*):

- a. The purpose of the proposed essential public facility civic use;

Applicant Response: The master plan does not propose a change in the general use of the site, but does propose modernized facilities to improve care within the facilities. The Goals and Purpose of the developments under the plan are to modernize existing facilities, addressing deferred maintenance, and adapting to new models of care for behavioral health.

In the process, multiple facility improvements will be made, including:

- *Demolition of several buildings*
- *Improved circulation and parking*
- *Improved access to historic facilities of public interest*
- *Improved security measures*

These are more fully described in the sections “Goals & Project Needs” on page 20 and “Facilities Development” on page 27.

- b. An operational characteristics description of the proposed essential public facility civic use and an operational characteristics description of the existing use or uses;

Applicant Response: These are fully described in the section “Operational Characteristics Description” on page 32.

- c. An evaluation of the potential effects of the proposed essential public facility civic use upon the existing use or uses;

Applicant Response: The proposed uses are explicitly to modernize the Hospital’s facilities. The new facilities will be fully integrated with those existing facilities that will remain.

- d. An evaluation of the potential effects of the proposed essential public facility civic use upon the adjacent properties;

Applicant Response: Given the age of the hospital, the surrounding uses have changed through economic expansion and local planning over its history. Current surrounding uses are indicated in Figure 6 on page 6.

The effects from this plan and related projects should be neutral to positive on surrounding areas. Programs provided will be internal to the WSH campus.

Travel to and from the campus will be similar to current patterns, with potential improvements from potential changes in entry points (see item f, below).

- 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

Applicant Response: The Hospital's purpose and program directly serve a segment of Washington's special needs population, specifically those with behavioral health needs. The investments being proposed are being made to improve the delivery of those services.

With regard to children, the WSH site includes the Child Study & Treatment Center (CSTC), which provides services to minors with behavioral health treatment needs.

- f. Identification of any applicable mitigation measures designed to address any potential effects identified through the evaluation required herein.

Applicant Response: The modernization of the facilities is largely "self-mitigating", in the sense that consolidation of programs into a contemporary facility with enhanced security will further reduce any potential effects of the WSH operations on the surrounding community.

Regular staff access to the campus from the east (87th Ave.) and west (Sentinel Drive), will be reduced by access control, and changes to the access points from Steilacoom Blvd. are suggested to reduce congestion along that route.

2. Essential Public Facilities Review Criteria

The following provides a response to the review criteria provided in LMC 18A.40.060.B.2.a through k, and B.4:

- g. 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.

Applicant Response: The section on Goals & Project Need (p.20-22) describe the policy considerations that underlie the project need. The subsection "Washington State Demographics" (p. 21) summarizes the need in service area. A summary of health care facilities in the region was provided by DSHS as a stand-alone document (11-March-2022, from R. Hubenthal).

Staff Analysis: The summary of health care facilities is provided in Exhibit 6.. Staff has no additional analysis.

- h. Consistency with Sponsor's Plans. The proposed project should be consistent with the sponsor's own long-range plans for facilities and operations.

Applicant Response: As a master plan update for an existing facilities campus, this application itself represents DSHS' plans for the hospital and associated facilities.

Staff Analysis: Staff has no additional analysis.

- i. 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 plan.

Applicant Response: These criteria are listed in the section “Planning Regulatory Context” beginning on p. 5. The City’s Compatibility of Use criteria are addressed on p.7. The County’s Key Evaluation Criteria are summarized on pp. 7-8, with explicit page references for each criterion.

Staff Analysis: Staff has no additional analysis.

- j. 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.

Applicant Response: The subsection “Washington State Demographics” (p. 21) summarizes the need in service area.

Staff Analysis: Staff has no additional analysis.

- k. 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.

Applicant Response: Tables 1 & @ (pp.iv-v) and Table 6 (p. 22) describe the project program/need.

Staff Analysis: Staff has no additional analysis.

- l. 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.

Applicant Response: The site selection considerations are described on p. 21. A matrix of alternative sites considered was provided by DSHS as a stand-alone document (1-June-2022, from R. Hubenthal).

Staff Analysis: The matrix of alternative sites considered by DSHS is provided in Exhibit 5. Staff has no additional analysis.

- m. 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.

Applicant Response: The master plan update’s core project is the modernization of an existing facility on an existing campus, which does not substantially change the distribution of EPFs. A summary of health care facilities in the region was provided by DSHS as a stand-alone document (11-March-2022, from R. Hubenthal).

Staff Analysis: The applicant provided a list of health care facilities and their locations within Pierce County (Exhibit 6). This list shows that mental health services are provided throughout Pierce County including the cities of Lakewood, Tacoma, Puyallup, Fife, Gig Harbor, University Place, and Sumner. In total, including the existing Western State Hospital, the City of Lakewood is

home to fifteen (15) of the approximately 140 Behavioral Health Agency facilities within Pierce County. Staff finds that the 2020 Master Facilities Plan doesn't place further undue burden to the City of Lakewood community.

- n. 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 evaluate.

Applicant Response: Stakeholder engagement is summarized in Appendix 1.

Staff Analysis: As detailed in the Appendix 1 of the 2020 Master Facilities Plan (Exhibit 2), DSHS had meetings with Historic Fort Steilacoom Association, the Town of Steilacoom, Pierce College at Steilacoom, Steilacoom Historical School District, and partnered with city on two open public meetings. The August 21, 2021 public meeting was an in-person even at Custer Elementary School in Lakewood. The September 9, 2021 public meeting was a virtual meeting to allow those concerned about COVID-19 to participate in the public meetings. This public participation is in addition to the code require public comment periods. Staff has no additional analysis.

- o. 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.

Applicant Response: See Planning Regulatory Context, beginning on p. 5.

Staff Analysis: Staff has no additional analysis.

- p. 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.

Applicant Response: As noted on page 8, the P/I zoning specifically addresses the hospital's land use.

Staff Analysis: Staff has no additional analysis.

- q. 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.

Applicant Response: See the SEPA checklist, Appendix 8.

Staff Analysis: In addition to the proposed mitigation provided in the SEPA checklist and the Facilities Master Plan, the SEPA MDNS (Exhibit 13) provides measures to mitigate the potential impacts the proposed Facilities Master Plan update has on the local environment. The following is a summary of those mitigation measures that have been incorporated with this staff report (Condition 1).

- Future development under the updated Master Plan will employ site-specific Construction Storm Water Pollution Prevention (CSWPP) and Temporary Erosion and Sediment Control (TESC) plans, as required by City development regulations.
- Future development at the WSH campus will be subject to the Lakewood Municipal Code provisions regarding significant trees (LMC 18A.50.320).
- Specific measures to mitigate impacts on significant vegetation include:

- *Site-specific landscaping designs will limit the development of hardscapes and building footprints within the drip-lines of significant trees, including protected White Oaks.*
 - *Site-specific irrigation plans for future landscaped areas near oak stands will establish procedures to avoid overwatering of the root zone.*
 - *During construction, all significant trees will be protected by tree fencing located at the drip-line, with no soil disturbance or material storage allowed within the drip-line.*
 - *Project permitting will require development of a tree retention plan that locates all significant trees on the site by species and caliper size, including the extent of drip-lines.*
 - *Removal of any significant trees during construction will be replaced according to applicable development regulations in the Lakewood Municipal Code.*
 - *Individual development projects will be subject to Pierce County and Lakewood regulations for control and removal noxious and invasive weeds.*
 - *The updated Master Plan retains approximately 48 acres of wildlife habitat in its current condition, which includes Oregon White Oak, wetlands, streams, and riparian areas on or adjacent to the campus.*
 - *Individual projects under the Master Plan will be required to conduct site specific field studies to identify sensitive species and habitats and evaluate potential impacts associated with the proposed development activities.*
 - *Construction activities associated with implementation of the Master Plan will comply with City of Lakewood health and safety regulations, including LMC Chapter 8.36 – Noise Control. Construction activities will be limited to daylight hours.*
- r. **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:
1. Appropriate provisions are made for water, sanitary sewer, drainage ways, utilities, roadways, emergency services, and any other applicable infrastructure or services.

Applicant Response: As described in the Infrastructure section of the Master Plan, existing infrastructure has adequate capacity for the development proposed in the plan. Water service to new facilities are intended to be provided by Lakewood Water district, rather than existing wells.

See pp. 39-42 in the master plan report, and technical appendices.

Staff Analysis: Correction the Utilities and Infrastructure section is provided on pages 43 to 47 in the December 15, 2021 Facilities Master Plan and technical appendices. Staff has no additional analysis.
 2. Critical areas will be protected.

Applicant Response: The WSH master plan protects steep slopes above Garrison Springs, as well as sensitive landscapes.

See 34-35 in the master plan report.

Staff Analysis: Correction the Open Space & Landscape section is provided on pages 38 to 39 in the December 15, 2021 Facilities Master Plan and technical appendices. Staff has no additional analysis.
 3. Usable open space will be provided.

Applicant Response: No development is proposed on areas of the site zoned for Open Space, or on areas of existing active open space uses.

See 34-35 in the master plan report.

Staff Analysis: Correction the Open Space & Landscape section is provided on pages 38 to 39 in the December 15, 2021 Facilities Master Plan and technical appendices. Staff has no additional analysis.

4. 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.

Applicant Response: The on-campus road network is proposed to be improved, with clearer wayfinding, and clarity between use areas. Access to the campus will be shifted to focus on the entries directly from Steilacoom Blvd., reducing traffic on 87th and Sentinel Drive.

See 30-33 in the master plan report.

Staff Analysis: Correction the Access, Circulation, & Transportation section is provided on pages 34 to 36 in the December 15, 2021 Facilities Master Plan and technical appendices. Staff has no additional analysis.

5. Approval criteria and mitigation measures are established which include general design elements and linkage components.

Applicant Response: The WSH Master Plan articulates guiding principles (see p. 23) to:

- a) Modernize facilities to support a contemporary model of care;
- b) Improve the overall efficiency of the campus, including linkages and wayfinding.

It also includes setbacks and height limits (Table 6, p. 25), improved circulation to shape future facilities.

Staff Analysis: Correction the guiding principles (development pattern and principles) are provided on page v and the setback and height limits are provided in Table 7 on page 29 in the December 15, 2021 Facilities Master Plan. Staff has no additional analysis.

6. The safety of the general public as well as workers at and visitors to the facility is ensured.

Applicant Response: 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.

Staff Analysis: Correction the Site Security section is provided on pages 41 to 42 in the December 15, 2021 Facilities Master Plan and technical appendices. Staff has no additional analysis.

3. LMC 18A.30.130 – Conditional Use Criteria:

Per LMC 18A.40.060.B.2, essential public facilities shall require a conditional use findings provided in LMC 18A.30.120. The following provides a response to the criteria for approval.

- a. The granting of the conditional use permit will not:
 1. Adversely affect the established character of the surrounding vicinity. For the purposes of this section, character shall mean the distinctive features or attributes of buildings and site design on adjacent properties and in the vicinity and as articulated in the comprehensive plan, including but not limited to building facade, length, building modulation, building height, roof form, tree

cover, types of flora, location of landscaping, size and location of signs, setbacks, amount and location of parking, fencing type, height and location, and the like.

Applicant Response: *The applicant did not directly answer this criteria.*

Staff Analysis: *Per Findings of Fact #19, all new facilities associated with the 2020 Master Facilities Plan will be consistent with LMC 18A.70 Community Design, Landscaping, and Tree Preservation, except for building height and setbacks, tree preservation, and architectural design and scale. As shown on the 2020 Master Facilities Plan Master Development Plan (figure 17), the 2020 Master Facilities Plan will provide a compact campus that will preserve the open areas to the west, north, and east of the WSH campus which will act as a natural buffer to surrounding community. As described in Section E.2.o and E.2.p above, the 2020 Master Facilities Plan will be compatible with the local land use regulations and surrounding land uses. Additionally, as a result of the public comment periods and public meetings, the city issued correction letters that resulted in further compatibility with the community. As conditioned in Section G below, staff finds the proposal is compliant with this criterion.*

2. Be detrimental to the public health, safety and general welfare.

Applicant Response: *The applicant did not directly answer this criteria.*

Staff Analysis: *The Western State Hospital essential public facilities and mental health uses already exists on the subject site. As detailed in Section E.1 and E.2.r.6 above, the proposed 2020 Master Facilities Plan includes enhanced security with secured entrance to facilities for patient care and overall site security, improved access to historic facilities, and improvements to circulation. Specifically, the new forensic hospital windows will be capable of withstanding impacts of 2,000 foot-pounds and exterior fencing will be no less than fourteen feet (14-feet) high and will be constructed of non-climbable materials. The Site Security section of the 2020 Master Facilities Plan (page 41), and associated map (Figure 24), describes the general security measures for the adult forensic facilities and Child Study and Treatment Center (CSTC). The city requested the WSH civil commitment and forensic commitment patient release procedures to further ensure community health, safety, and general welfare. The patient release procedures are included in Appendix 7 of the 2020 Master Facilities Plan. Staff finds the proposal is compliant with this criterion.*

3. Be injurious to the property or improvements adjacent to, and in the vicinity of, the site upon which the proposed use is to be located.

Applicant Response: *The applicant did not directly answer this criteria.*

Staff Analysis: *As described in CUP Criteria of Approval a.2 above, the more compact layout for the major facilities on the WSH campus maintains open space and preserve setbacks from adjacent uses. Staff finds the proposal is compliant with this criterion.*

- b. The granting of the proposed conditional use permit is consistent and compatible with the goals and policies of the comprehensive plan, and any code, ordinance, regulation or standard in effect to implement the plan.

Applicant Response: *The applicant did not directly answer this criteria.*

Staff Analysis: *The 2020 Master Facilities Plan consistency with the comprehensive plan goals and policies is provided in Section D, above. Staff finds that granting of the master facilities plan is compatible with the Comprehensive Plan goals and policies as described, and conditioned, in Section D of this staff report.*

- c. The proposed use is properly located in relation to other land uses, transportation and public facilities and services in the vicinity; and further, that the capacity of the transportation system and

other public facilities and services will adequately serve the proposed use without placing an undue burden on such systems, facilities and services.

Applicant Response: *The applicant did not directly answer this criteria.*

Staff Analysis: *The proposed essential public facilities use is properly located as detailed in the Western State Hospital comprehensive plan goals and policies. Per Findings of Fact #18, the TIA indicates that the project level of service impacts could be mitigated through intersection improvements. Public services and transportation impacts were reviewed and mitigated for with the associated SEPA MDNS. As conditioned, staff finds the proposal is compliant with this criterion.*

- d. The intensity (i.e., the nature, types and hours of human activity) and character of the proposed use are compatible with the intensity and character of the uses of adjacent property and of property in the vicinity.

Applicant Response: *The applicant did not directly answer this criteria.*

Staff Analysis: *The Western State Hospital essential public facilities and mental health uses already exists on the subject site and has been located on the subject site since the 1870's. The 2020 Master Facilities Plan Master Development Plan (figure 17) shows a compact campus, which is consistent with the city's comprehensive plan (see Section D, above). Staff finds that the proposal is compliant with this criterion.*

- e. That the site is of sufficient size to accommodate the proposed use; and further that, in the opinion of the City, all yards, open spaces, landscaping, walls and fences, parking, loading, and other necessary features are properly provided to assure the proposed use will be compatible with adjacent uses and the character of the vicinity.

Applicant Response: *The applicant did not directly answer this criteria.*

Staff Analysis: *Overall, the WSH site covers over 288 acres of developed and undeveloped land. As part of this proposal, and shown on Figure 17 of the 2020 Master Facilities Plan, this mater plan update incorporates a compact facility footprint to allow for greater security. The physical characteristics of the site are appropriate for the use considering the use currently exists on site. The site is adequately sized for the proposed use and all facilities and amenities required by this title and desired by the applicant. As conditioned, Staff finds the 2020 Master Facilities Plan will be compliant with this criterion.*

- f. The proposed use will not introduce hazardous conditions at the site that cannot be mitigated so as to protect adjacent properties, the vicinity, and the public health, safety and welfare of the community from such hazards.

Applicant Response: *The applicant did not directly answer this criteria.*

Staff Analysis: *All individual projects anticipated in the 2020 Master Facilities Plan are required to comply with LMC Title 18A, Title 12, the Building International Code and International Fire Code, which will ensure that the project does not place a burden on adjacent properties, the vicinity, and the public health safety and welfare of the community from such hazards. As conditioned, Staff finds the 2020 Master Facilities Plan will be compliant with this criterion.*

- g. The conditions necessary to mitigate the impacts of the proposed conditional use are capable of reasonable monitoring and reasonable enforcement.

Applicant Response: *The applicant did not directly answer this criteria.*

Staff Analysis: *All proposed conditions are capable of reasonable monitoring and reasonable enforcement. As conditioned, Staff finds that granting the 2020 Master Facilities Plan will be compliant with this criterion.*

F. CONCLUSIONS

In accordance with LMC 18A.40.060.B Essential Public Facilities, staff have evaluated the proposal and finds that the 2020 Western State Hospital Master Facilities Plan is consistent with the adopted plans, policies, and the ordinances of the City of Lakewood, subject to the recommended conditions of approval provided in Section G, below.

G. RECOMMENDATION

If approved, Community Development Department staff recommends the Western State Hospital Master Facilities Plan, LU -20-00027, be subject to the following recommended conditions:

1. The City issued a Modified SEPA Mitigated Determination of Non-significance dated June 6, 2022. All mitigation measures are incorporated herein by reference as conditions of approval.
2. Alterations, expansions or major improvements not included in this Master Facilities Plan update shall require a land use modification permit.
3. Individual projects under the 2020 Master Facilities Plan may require site specific field studies to identify sensitive species and habitats and evaluate potential impacts associated with the proposed development activities depending on the location of the project. The State Department of Social and Health Services or associated agents shall consult with the Planning Department to determine what site specific field studies are required, if any.
4. Building, Plumbing and Mechanical permits shall be required through the City of Lakewood prior to construction of any buildings. The State Department of Social and Health Services or associated agents shall consult with the City of Lakewood regarding these permits and the individual construction activities.
5. Site Development permits shall be obtained for the project through City of Lakewood Public Works Engineering Department as necessary. The State Department of Social and Health Services or associated agents shall inquire with Public Works Engineering to determine which activities, improvements or expansions will require site development.

H. EXHIBITS

1. Staff Report
2. Master Facilities Plan Application
3. 2020 WSH Master Facilities Plan dated December 15, 2021
4. WSH Response to Additional Siting Criteria Mental Health Facilities
5. DSHS Siting Criteria Matrix
6. WSH Facility Summary
7. Affidavit of Posting
8. DSHS Responses to Questions Raised by the City of Lakewood dated March 11, 2022
9. Notice of Complete Application issued on May 26, 2020
10. Notice of Application issued on June 10, 2020
11. WSH Master Plan Comment Matrix
12. WSH Plan Agency Comment Letters Combined

13. WSH SEPA MDNS Issued on June 6, 2022
14. City Issued Correction Letters
15. City of Lakewood Public Works Engineering Comments (Revised) dated May 27, 2022
16. Notice of Public hearing issued June 27, 2022

I. STAFF REPORT PREPARATION:

That a copy of the staff report will be available for inspection at no cost at least five (5) calendar days prior to the hearing and copies will be provided at the cost of reproduction.

Date of Issuance: July 20, 2022
Date of Public Hearing: July 27, 2022

Prepared By:



Courtney Brunell, MPA
Planning Manager