



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
Office of Capital Programs
P.O. Box 45848, Olympia, Washington 98504-5848

August 30, 2022

Courtney Brunell, Planning Manager
City of Lakewood, Washington

SUBJECT: **REQUEST FOR RECONSIDERATION**

The Department of Social and Health Services requests reconsideration of the Hearing Examiner's Final Decision pertaining to the DSHS Master Plan Amendment, LU20-00027.

Maximum Bed Count

Conclusion of Law No. 3, Revisiting SEPA Traffic Analysis, notes that the DSHS traffic report was not challenged by appeal of the MDNS and cannot be questioned in the hearing. However, the Hearing Examiner states that it's scope may be clarified if the mitigation is not clear. The Hearing Examiner assumes the traffic analysis was based on the 864 projected bed count in 2031 rather than the entirety of the campus at 1101 beds.

At the City's request, DSHS added Table 1 and Table 2 to the master plan document to illustrate how the campus bed count is projected to change between 2019 and 2031 with the demolition of existing buildings and the construction of new patient wards. The previous master plan allowed hospital expansion from the 922 beds base to 980 beds with the additional 58 beds now under construction at Building 28. Subsequent additions and reductions show a maximum hospital capacity of 1,011 beds including the new community residential treatment facilities(RTF). Recognizing that the siting of the future residential treatment facility (RTF) is speculative and not included in the current DSHS Ten-Year Capital Plan, the total site bed capacity may be reduced by 48 beds to 963 beds (1,011 - 48 = 963).

Even with a Total Site Bed Capacity of 963 beds, we should recognize that this is the "built capacity" for the campus. WSH and CSTC never operate at their fully built capacity. There are always some beds or wards held vacant to allow for flexibility to move patients between wards to best meet their needs, to adjust for staff availability, and to implement quarantine precautions. Additionally, when possible, WSH keeps a couple of wards vacant to accommodate major repairs or capital improvements that can only be accomplished in an unoccupied space.

A 963-bed built capacity at 90% occupancy equals 867 patients in residence which, coincidentally, almost matches the 864 beds count the Hearing Examiner cites as the appropriate metric for trip generation. Because the daily census fluctuates, a Total Site Bed Capacity based on a "built

capacity” of 963 beds is more accurately monitored and, DSHS believes, accomplishes the intent of the Hearing Examiner.

DSHS requests reconsideration to establish the total Site Bed Capacity at 963 beds as shown in the “2025-27 column” of Table 2.

Modifications to the Mandatory Development Standards

We request reconsideration on decision item 9 which states, “The master plan design specifications identified in Finding No. 20 of the staff report are not authorized to the extent they conflict with Chapter 18A.70.A LMC.”

Master Plan Design Specifications identified in Finding No. 20 includes:

Consistent with the City of Lakewood’s Public/Institutional Zoning designation, new facilities developed at the WSH campus will follow the 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 +/-

In accordance with LMC 18A.60.080.A:

“A. Because of the nature of the typical uses characterizing this use type and the high need for flexibility in siting and operating public facilities, general development standards shall be determined jointly by the Director and City Engineer on a case-by-case basis considering the

type and intensity of the proposed use, adjacent uses and zoning, environmental issues, site design, and/or type and construction of buildings.”

The code states that the City is able to review projects on a case-by-case basis and set separate requirements. DSHS requests that the Hearing Examiner reconsider this item to include the contemporary best practices for architectural design, place making, sustainable design, and daylighting rather than the prescriptive requirements of 18A.70.040.2 on a case-by-case basis, as allowed by LMC 18A.60.080.A.

Sincerely,

Handwritten signature of Robert J. Hubenthal in black ink.

Robert J. Hubenthal, Director
Office of Capital Programs

C: Eric Ridenour, SRG
Aarón Martínez, Office of Capital Programs