

ORDINANCE NO. 2023-09-026

AN ORDINANCE AMENDING THE CORNWALL PARK NEIGHBORHOOD AREA 7 INSTITUTIONAL MASTER PLAN

WHEREAS, development in Area 7 of the Cornwall Park Neighborhood is guided by the 2006 Cornwall Park Neighborhood Area 7 Updated Institutional Master Plan; and

WHEREAS, the 2006 Cornwall Park Neighborhood Area 7 Updated Institutional Master Plan (2006 Cornwall Park IMP) is referenced in the zoning table for Area 7 of the Cornwall Park Neighborhood Plan; and

WHEREAS, the IMP boundary contains approximately 82 total acres, approximately 67.5 of which area owned by Peace Health, approximately 12 of which are designated and protected as open space, while privately held properties within the IMP boundary total approximately 14.5 acres; and

WHEREAS, Peace Health identified necessary reconfigurations and a proposed phasing plan to guide future development on its campus due to the evolving needs of medical service and care in early 2021, and;

WHEREAS, Peace Health and the City began discussions on these reconfigurations, phasing plan and revisions to the street improvement standards in the 2006 Cornwall Park IMP in late 2021, and;

WHEREAS, in November 2021, Peace Health indicated to the City that it would not be proposing any changes to the IMP boundaries, internal Peace Health zone lines and applicable development standards (except for street improvements) were not necessary; and

WHEREAS, in May, 2022, the City clarified that Peace Health could apply for an amendment to the existing IMP under a TYPE V-A process pursuant to BMC 21.10.140(A) because the proposed amendments would not require changes to the Comprehensive Plan or the Cornwall Park Neighborhood Plan; and

WHEREAS, in June 2022, Peace Health submitted application materials to the City for their proposed amendments to the existing 2006 Cornwall Park IMP, and;

WHEREAS, on July 21st and August 3, 2022, the Planning and Community Development Department (PCDD) issued a notice of application to surrounding property owners and neighborhood representatives and included a 30-day comment period ending on September 2, 2022; and

WHEREAS, the PCDD received substantial public comments on the proposed amendments to the 2006 Cornwall Park IMP during and after the conclusion of the public comment period; and

WHEREAS, on November 4, 2022, and based upon the public comments received, the PCDD requested additional information from Peace Health;

WHEREAS, on January 17, 2023, Peace Health provided the requested additional information to the PCDD; and

WHEREAS, on June 21, 2023, the PCDD issued a SEPA determination of nonsignificance on the proposed update and provided a 14-day comment period; and

WHEREAS, on June 21, 2023, the PCDD issued a notice of public hearing before the Planning Commission for July 6, 2023, at 7:00 PM, in the City Council chambers in City Hall at 210 Lottie Street in Bellingham. The notice was published in the newspaper, posted on the City's webpage, emailed and mailed to parties of record including the Cornwall Park Neighborhood representatives; and

WHEREAS, on July 6, 2023, the Planning Commission held the public hearing, took verbal testimony from PCDD staff, Peace Health and members of the general public on the proposed amendments to the 2006 Cornwall Park IMP; and

WHEREAS, at the conclusion of the July 6th public hearing, the Planning Commission closed the verbal comment period, extended the written comment period to July 20, 2023, and scheduled a work session for August 3, 2023; and

WHEREAS, at the work session on August 3, 2023, the Planning Commission had further discussion with City staff and Peace Health on the proposed update and were presented with draft findings of fact, conclusions of law and a set of recommendations for their consideration; and

WHEREAS, at the conclusion of the work session on August 3, 2023, the Planning Commission made motions to accept each of the staff recommendations for approval and directed staff to prepare final findings, conclusions and recommendations, an adopting ordinance and a revised version of the draft 2023 Cornwall Park IMP for consideration by the City Council; and

WHEREAS, on September 11, 2023, the City Council held a closed record hearing on the proposed update to the Cornwall Park IMP, with appropriate public notice provided, and reviewed the complete record of the Planning Commission including their findings of fact, conclusions and recommendations and a final 2023 Cornwall Park IMP, and made a motion to approve the application, as recommended by the Commission; and

WHEREAS, the City Council finds that the proposed 2023 Cornwall Park Neighborhood Area 7 IMP satisfies the requirements of BMC Chapter 20.40, and are consistent with the Bellingham Comprehensive Plan and Cornwall Park Neighborhood Plan.

NOW THEREFORE, THE CITY OF BELLINGHAM DOES ORDAIN:

Section 1. The 2006 Cornwall Park Neighborhood Area 7 Updated Institutional Master Plan is hereby repealed.

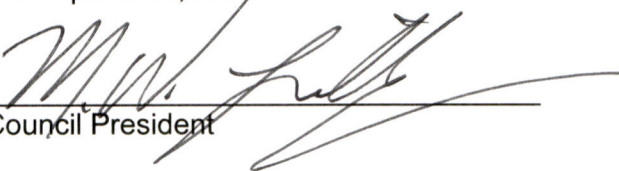
Section 2. The 2023 Cornwall Park Neighborhood Area 7 Institutional Master Plan, as provided in **Exhibit A**, including its figures, appendices and the recommendations put forth by staff and the Planning Commission is hereby adopted.

Section 3. The City Council adopts the August 3, 2023, Findings of Fact, Conclusions and Recommendations as provided in **Exhibit B**.

Section 4. The requirement for Peace Health's 1.8% pro-rata contribution to Phase I of the Birchwood / Meridian / Squalicum Parkway round-about shall be paid prior to issuance of the initial land use and/or building permit approval for any of the projects identified in Phase I.

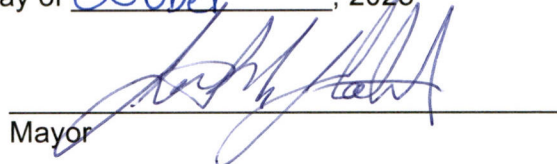
Section 5. Planned Development Contract #PDC 90-21 shall be repealed at the moment an institutional site plan (planned development permit) approval is granted for the West Pavilion, it's rooftop heli-pad and the existing ground heli-pad. Said institutional site plan approval will require additional project specific environmental review under SEPA and a subsequent environmental determination made.

PASSED by the Council this 25th day of September, 2023



Council President

APPROVED by me this 23 day of October, 2023

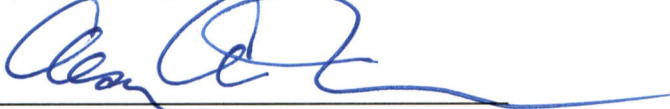


Mayor

ATTEST: 

Finance Director

APPROVED AS TO FORM:



Office of the City Attorney

Published:

September 29, 2023

Cornwall Park Neighborhood Area 7 Updated Institutional Master Plan

Submitted to the City of Bellingham July 6, 2006

Updated November 2006 to include September 7, 2006
Bellingham Planning Commission Recommendations

Draft Amendment submitted to the City of Bellingham, June 9, 2022
Resubmitted with revisions January 17, 2023
Resubmitted with additional revisions June 13, 2023
Resubmitted August 23, 2023, to include Bellingham Planning Commission
recommendations



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I. INTRODUCTION

Founded in 1891, St. Joseph Medical Center (SJMC) is owned and operated by PeaceHealth as a non-profit, voluntary, private institution and is the second largest employer in Whatcom County. SJMC operates 300 beds, with 255 licensed as in-patient beds, on its Main Campus on Squalicum Parkway with a level II trauma center. The Squalicum Parkway facility and campus are devoted to acute care and supporting medical services and is classified as Area 7 in the Cornwall Park Neighborhood Plan. This document focuses exclusively on the Squalicum Parkway facility and campus.

The City of Bellingham requires that large campus type public or quasi-public uses on sites of 50 acres or more be developed under an approved Institutional Master Plan (IMP). The first IMP for the SJMC Main Medical Campus was approved in 1983. The comprehensive plan described the buildings and other facilities required to meet projections for long-term health care needs of the SJMC service area. The updated 2006 IMP was prepared in order to anticipate and serve future needs.

In preparation for submitting the updated 2006 Area 7 IMP, PeaceHealth initiated a Regional Institutional Master Planning process in 2003 to determine how the Medical Center could best serve future needs of the region through 2025. The comprehensive planning process included a refinement of the Medical Center's vision and goals, analysis of existing facility and site

conditions, assessment of demographic and health care trends, workload and space needs projections and financial feasibility.

This planning process included several opportunities for public input, including three open houses held in late 2005/early 2006.

The process concluded that PeaceHealth's primary focus in Whatcom County should be the provision of acute level services at the medical center on Squalicum Parkway, supported by multiple outpatient facilities that focus on primary care, diagnostic imaging, Same Day/Urgent Care services, and other healthcare services not requiring a hospital stay.

Since adoption of the 2006 IMP, PeaceHealth has adjusted its future planned development to reflect changes in the region's projected healthcare needs. New data suggest that Whatcom County is experiencing continued population growth with an expected population increase of approximately 48 percent between 2000 and 2025. Much of that growth will be due to the increasing percentage of the senior population. This 2022 IMP Amendment has been prepared to describe updated existing conditions and refinements in the Hospital's future development plans to meet future needs through 2042.

A 2022 IMP Amendment Background and Review Process

Since the 2006 IMP update, population growth in the PeaceHealth St. Joseph service area and an increase in demand for medical procedures, particularly during the COVID-19 pandemic, have resulted in a higher community demand for acute hospital services. A shift toward single-patient rooms rather than the shared, multiple-bed per room model of the past, requires additional or remodeled floor space to accommodate current patient needs.

PeaceHealth has determined that a combination of expansion and interior remodel of existing hospital buildings would be the most beneficial path forward to meet community needs. As the growing utilization of the hospital is reviewed, trends show that a higher number of routine procedures that used to require stays in the hospital are now performed in clinic and outpatient surgical facilities. This trend shows that patients in hospitals typically have more complex, emergency, or critical-care needs. PeaceHealth is responding to these trends by focusing future development areas of the campus to improve patient services, expand the emergency department, and upgrade and expand the neonatal, pediatrics, and women health services, as outlined in Section III.F of this IMP Amendment.

The 2022 IMP Amendment is occurring under the City of Bellingham's Type V-A process, which governs City Council quasi-judicial decisions regarding institutional master plans and

amendments, as described in Bellingham Municipal Code (BMC) 21.10.140.

Prior to the initiation of the 2022 IMP Amendment process, two meetings were held with the Cornwall Park Neighborhood Association to apprise them of the upcoming plans: an in-person presentation to the Cornwall Park Neighborhood Association Board in July 2021 and a virtual presentation to the full association at its regular fall meeting in October 2021.

A preapplication conference with the City of Bellingham and the PeaceHealth design team was held on November 23, 2021, and a preapplication neighborhood meeting was held virtually via the Zoom platform on April 20, 2022. Property owners and residents within 500 feet of the IMP boundary, as well as an additional 500 feet north of Birchwood Avenue near the IMP boundary, were invited to the neighborhood meeting via postal mail and email. Another virtual meeting was held in June 2022 to answer specific questions raised in April.

PeaceHealth submitted an application for the IMP Amendment proposal to the City of Bellingham on June 9, 2022. The City published a Notice of Complete Application on August 3, 2022, and held a 30-day public comment period. Another virtual presentation was held in October 2022 to address additional neighborhood questions and concerns.

Next steps for review and approval of the IMP Amendment proposal include the following:

- The Bellingham Planning Commission will hold at least one open record public hearing on the IMP Amendment. Notice of the hearing will be published in a newspaper of general circulation, via mailed notice, and via notices posted on or adjacent to the IMP Amendment site at least 15 days prior to the hearing. Based on the outcome of this process, the Planning Commission will provide a written recommendation to the City Council regarding the IMP Amendment proposal.
- The City Council will consider the IMP Amendment proposal and Planning Commission recommendations at a closed record hearing with the same notification requirements as the Planning Commission hearing. The Council will mail a notice of decision to the applicant within 10 days of the decision, including a statement of any threshold determination made under SEPA.

II. OVERVIEW OF AREA 7 INSTITUTIONAL MASTER PLAN

Area 7 of the Cornwall Park Neighborhood plan is an approximately 87-acre institutional zone (exclusive of public rights-of-way) owned by multiple landowners, including PeaceHealth, which owns approximately eighty percent of the designated area. Area 7 has been defined as an Institutional Zone by the City. An Institutional Master Plan is required to guide future site, building and infrastructure development.

A Scope of the Institutional Master Plan

In accordance with the requirements listed in the City of Bellingham Municipal Code (BMC) 20.40.050, the IMP defines the appropriate land uses; identifies planned circulation and utility improvements; and sets development standards for building heights, setbacks, landscape, parking and signage for Area 7. The Phased Development Projects identified in this IMP are expected to be achieved in a number of phases over an approximate twenty year time period.

The purpose of the IMP is to outline a planned development process for the Institutional Zone that will guide the review and approval of specific building project permit applications over the next

twenty years (through 2042). It lays out the intent of the property owners to develop the Institutional Zone in a coordinated and phased approach anticipating infrastructure needs such as traffic access and circulation, utilities, open space requirements and environmental implications. Once approved it provides a general framework for future development, but each proposed project will require its own permitting process which will address the specific requirements and mitigations for the building project being proposed at the time.

B Relationship of the IMP to Existing Regulatory Processes

Individual projects or improvements described in this IMP will be developed in compliance with all applicable BMC regulations and/or this IMP. Individual projects will go through the City's land use review process, which may include additional procedures such as preapplication meeting with staff, a preapplication neighborhood meeting, land use approvals, State Environmental Policy Act (SEPA) review, and building permit submittals.

III. ELEMENTS

Figure 1 illustrates the 24 facilities that exist within the Institutional Zone as of 2022. The Existing Facilities are here defined in terms of their land area (acres), building gross square footage (GSF) and number of off-street parking stalls.

Existing Facilities	Land Acreage	Building GSF	Parking Stalls
1. St. Joseph Main Medical Center Building	42.4	453,400	1,136
2. St. Luke's Health Education Center	6.4	19,400	186
3. Grabow Therapy & Wellness Center	0.7	12,800	46
4. Medical Arts Building (Bunker Building)	2.7	14,600	47
5. Community Cancer Center	0.7	37,000	46
6. Medical Office Plaza	3.4	39,900	281
7. Northwest Medical Center	1.0	39,900	203
8. St. Francis of Bellingham Extended Health Care	4.5	42,000	82
9. Parkway Medical Center	1.0	12,500	42
10. Wynne Building	1.4	10,900	37
11. Bellingham Day Surgery (Marble Building)	1.0	25,700	72
12. Mt. Baker Imaging	1.3	12,100	50
13. 3130 Ellis Outpatient Clinic	0.8	10,800	55
14. Bellingham Foot & Ankle, Back & Neck Clinics	0.5	3,900	23
15. Bellingham Dental Health Center, Northwest Surgical Association, Vascular Lab & Vein Center	0.9	7,900	35
16. 3120 Squalicum Parkway Medical Clinic	0.3	3,000	17
17. 3130 Squalicum Parkway Medical Office Building	0.4	4,400	22
18. 3136 Squalicum Parkway Medical Clinic	0.4	3,600	18
19. 3200 Squalicum Parkway Medical Office Building	0.7	7,300	37
20. 3232 Squalicum Parkway (Northwest Urologic Tech Services)	0.7	9,800	35
21. 3300 Squalicum Parkway Dental Clinic	0.8	6,600	45
22. Parkway Dental Clinic	2.3	17,600	74
23. Bellingham Childcare & Learning Center	2.0	7,200	13
24. The Willows Retirement Apartments	2.9	129,800	88
Total:	79.29	932,000	2,690

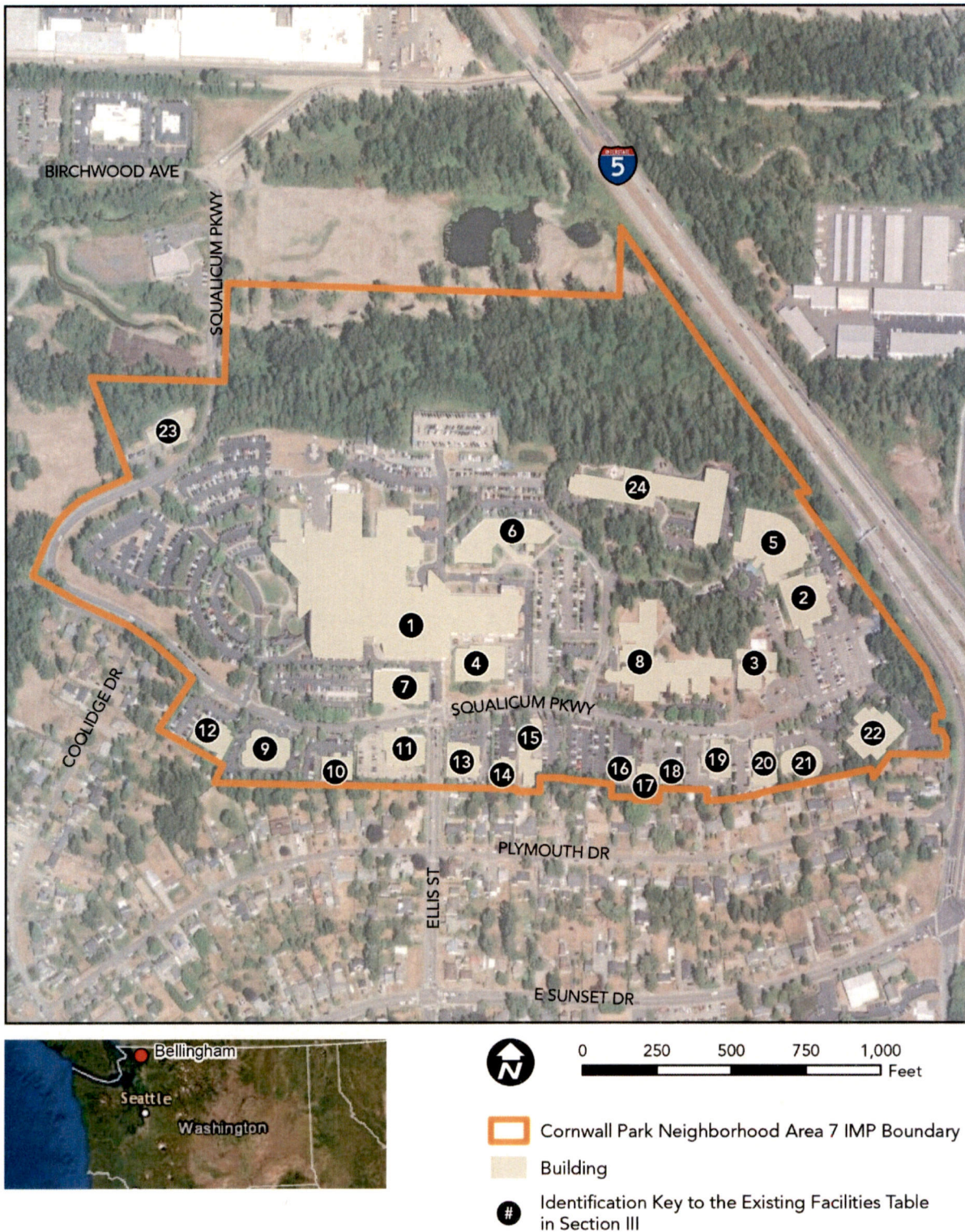


Figure 1. Institutional Master Plan Existing Property Map

A Land Use

The Institutional Zone is subdivided into three primary zones as illustrated in Figure 2. The general purpose of each zone is outlined below and further detailed in the Standards Section.

1. Zone 1: Medical Support – Purpose

Zone 1 consists of Medical Support uses south of Squalicum Parkway. This zone benefits from immediate proximity to the Medical Center while minimizing impact on the adjacent residential neighbors.

2. Zone 2: Hospital/Medical – Purpose

The developed area of the St. Joseph Medical Center campus comprises Zone 2, most of which lies more than 200 feet from adjacent residential areas to the south. The primary health care services associated with the Medical Center are located in this zone, including acute care, in-patient and long-term care clinics, outpatient diagnostic and treatment services as well as medical support uses.

3. Zone 3: Open Space – Purpose

The Open Space Zone is to be reserved for a natural area between the Medical Center campus and the Squalicum Creek restoration area (formerly Bug Lake). A perpetual easement was granted by St. Joseph Medical Center to the City of Bellingham in 2002 to permit conservation, public access and enhancement of the open space. The easement grants the City the rights to preserve, enhance and manage vegetation, water and fishery resources.

Land uses surrounding the Institutional Master Plan area are primarily residential, public or industrial as shown in Figure 3. “Sunset Square” and other commercial activities are located east of the site and Interstate-5. A separate and distinct “institutional” zone has been designated to the northwest of Area 7 for the purposes of multi-family residential development. This zone, Area 4 of the Cornwall Park Neighborhood Plan, is not included within the scope of this Institutional Master Plan.



Figure 2. Land Use Zones within the IMP Area

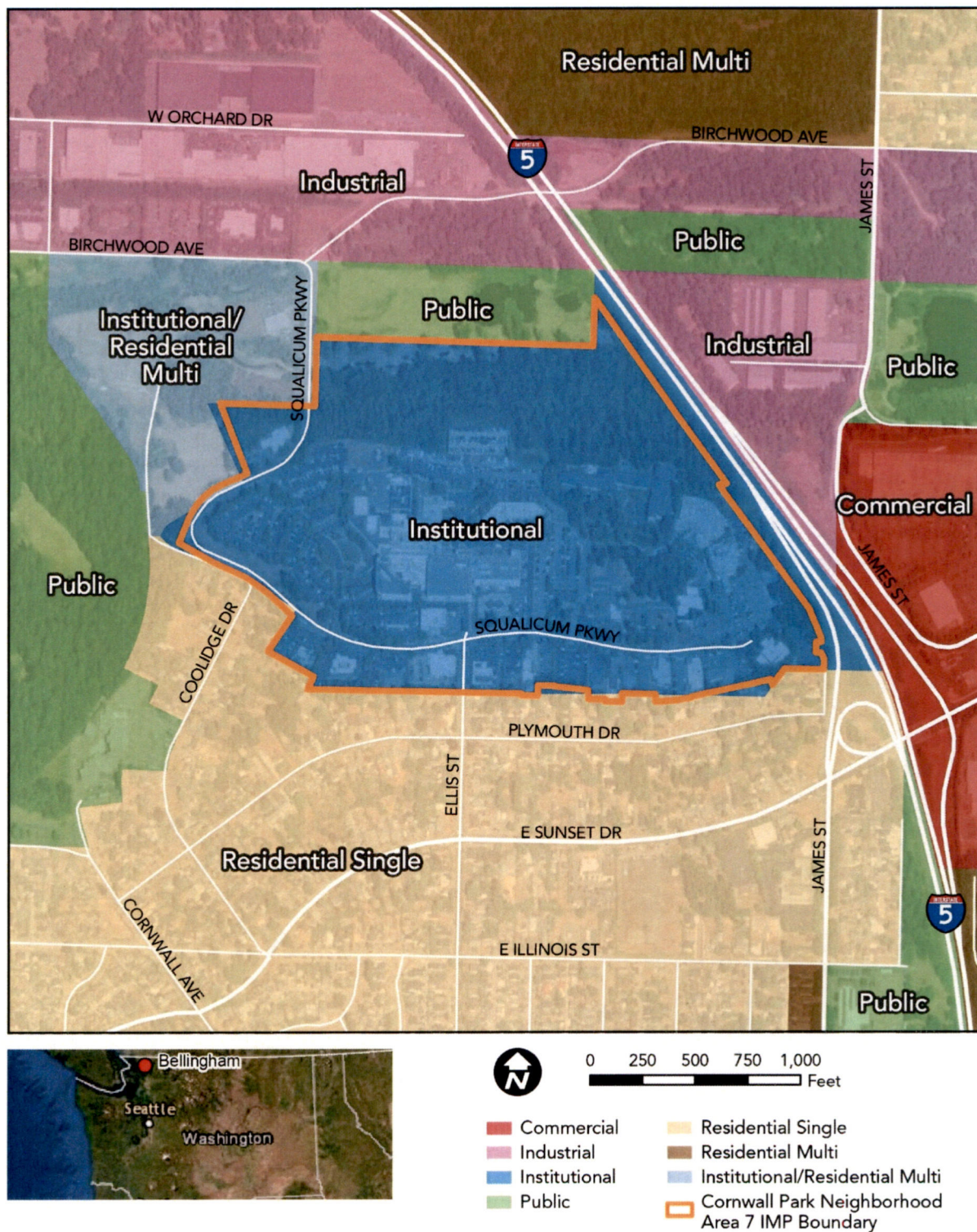


Figure 3. Land Use Zones Adjacent to IMP Area

B Vehicular Circulation

Results of an analysis of the projected traffic from the projects described herein determined that the existing circulation system was sufficient to handle increased traffic generated by the development of St. Joseph Medical Center through 2042. (See Section F for description of Phased Development projects.) Each project in the phased development schedule will require a transportation concurrency evaluation to determine if arterial street capacity is available to accommodate traffic impacts associated with the specific project at the time. Transportation impact fees (if any) will be assessed by the City on a per-project basis.

Vehicular circulation and access improvements to be installed with the West Pavilion and Phase 1 projects include the following:

- Reconfigured vehicular access in the west surface parking lot
- New covered drop-off lane with increased capacity and bypass lane
- New/enhanced bus stop location in coordination with Whatcom Transit

Possible future vehicular circulation and access improvements include the following:

- Squalicum Parkway Access Management: To improve safety with the potential increases in westbound vehicle queues at the Squalicum/Ellis traffic signal, upon completion of future phase development, conduct monitoring studies in coordination with City staff to evaluate the need for potential left-turn access restrictions on

Squalicum Parkway between Ellis Street and Levin Lane

PeaceHealth will make a pro rata contribution to Phase 1 of the Meridian/Birchwood Transportation Improvements, as listed on the City's 2024-2029 Transportation Improvement Program, consistent with the Transportation Impact Analysis in Appendix B.

The Campus internal circulation element of the IMP includes improved facilities for general vehicular traffic, emergency vehicles and transit, as well as pedestrians and bicycles, as described below.

1. General

Access to the SJMC Campus currently occurs from Squalicum Parkway at four points: (1) at the existing northwest driveway across from the Bellingham Childcare & Learning Center, (2) at the existing southwest driveway across from the Mt. Baker Imaging building, (3) at an existing driveway on the east side of the hospital adjacent to the Medical Arts Building (Bunker Building) and (4) at the existing southeast driveway adjacent to the St. Francis Convalescent Home. The existing internal drive aisles will be retained, with minor modifications to driveways and parking areas, and additional active transportation connections to accommodate future development needs. Figure 4 shows conceptual cross-sections. Any proposed modifications involving public rights-of-way would be included in development plans and subject to approval by the City's Public Works Department.

The existing West entry and drop-off area will be maintained with access from Squalicum

Parkway via the existing driveway (which also provides secondary ambulance access). The north drive aisle between the existing ground helipad and loading dock will be restricted to delivery, emergency, and medical staff vehicles for safety reasons, as shown in Figures 5 and 6.

The internal circulation improvements will be located to provide maximum flexibility for

Medical Center development. In addition, planning of the internal circulation improvements (for vehicles and bikes) and planning of pedestrian routes will be coordinated to minimize the number of vehicle and pedestrian intersections and maximize safety where roadways and pedestrian routes do cross.

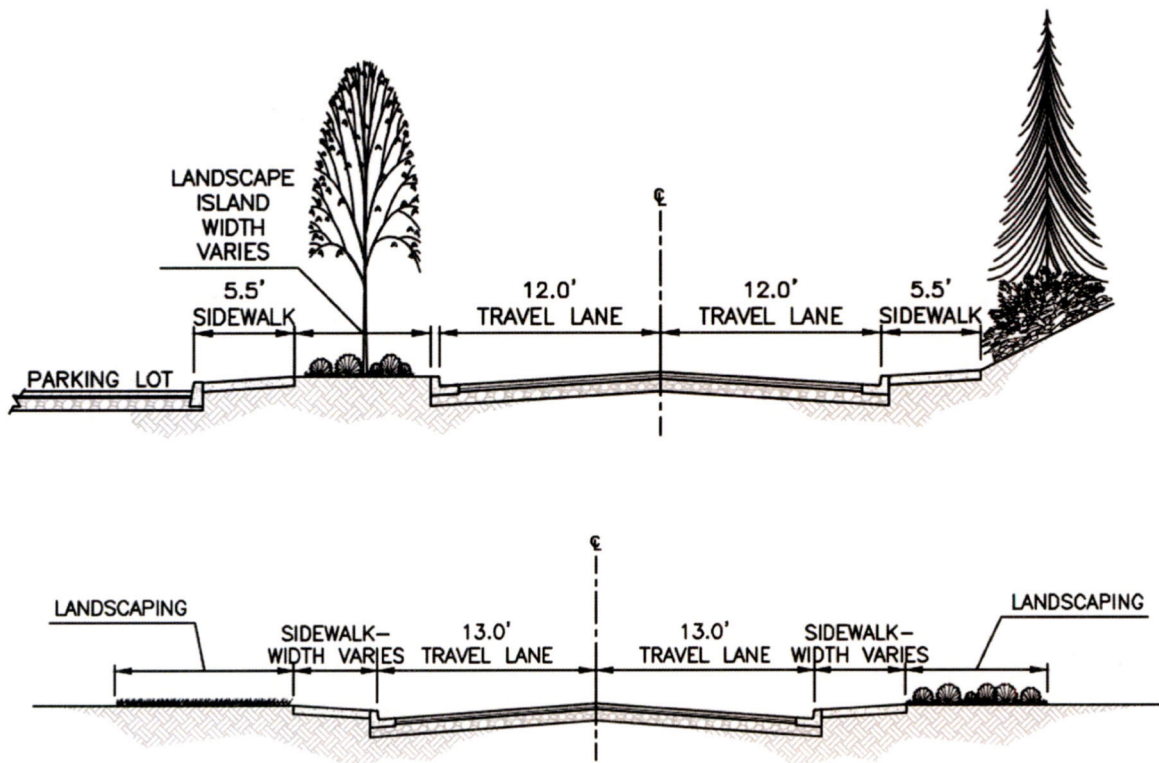


Figure 4. Conceptual Cross-Sections east of the East Parking Garage (top) and west of proposed West Pavilion (bottom)

2. Ambulance

Current emergency vehicle access to the Medical Center will be retained. The primary ambulance entry is located at Ellis Street and Squalicum Parkway with secondary ambulance

access at the existing driveway to the west. Short-term surface parking stalls for direct patient access to the Emergency Department will be available.

3. Transit

Transit service to the Institutional Master Plan area is provided by Whatcom Transit Authority (WTA). WTA provides fixed-route and demand-responsive service, with stops on Squalicum Parkway and on-Campus at the main Medical Center building, St. Francis and the Willows. Design of the internal circulation improvements and other planned development described in Subsection F will be coordinated with WTA staff to identify and incorporate transit-supportive features and facilities (bus stops, layover space, etc.).

4. Parking

St. Joseph Medical Center will continue to provide parking in a combination of surface lots and parking structures/decks, both stand alone and incorporated into the Medical Center building. A new parking garage providing a net increase of 404 parking stalls is currently under construction east of the Medical Center building and will be in use starting in 2023. Potential locations for new parking structures are illustrated in Figure 5. One new structure and a potential expansion of an existing parking structures are anticipated in order to meet the parking demand for the Medical Center campus through 2042. (See Subsection F for further description of planned parking structures.)

Existing surface parking areas will be reconfigured as necessary to accommodate new buildings.

Structured parking will be provided in new structures or through expansion of existing stand-alone structures and incorporated into the Medical Center building complex. Garages will be accessed from the internal circulation system. Pedestrian connections from the stand-alone garages to the Medical Center will be provided via sidewalks and raised crosswalks across the internal circulation network. Electric vehicle charging stations will be evaluated at existing and future parking areas in compliance with applicable City codes.

C Pedestrian/Bicycle Connectivity

Pedestrian and bicycle amenities will be built as part of the future short-term and longer-term development plans. In addition, sidewalks on Squalicum Parkway are not continuous and some improvements are necessary in order to create a safe walking environment within the IMP area. Figure 6 illustrates the conceptual plans for pedestrian and bicycle improvements. The north drive aisle between the existing ground helipad and loading dock will be restricted to delivery, emergency, and medical staff vehicles only for safety reasons, with pedestrian and bicycle access discouraged, as shown in Figures 5 and 6.

The following overview describes the pedestrian and bicycle amenities planned for Campus development.

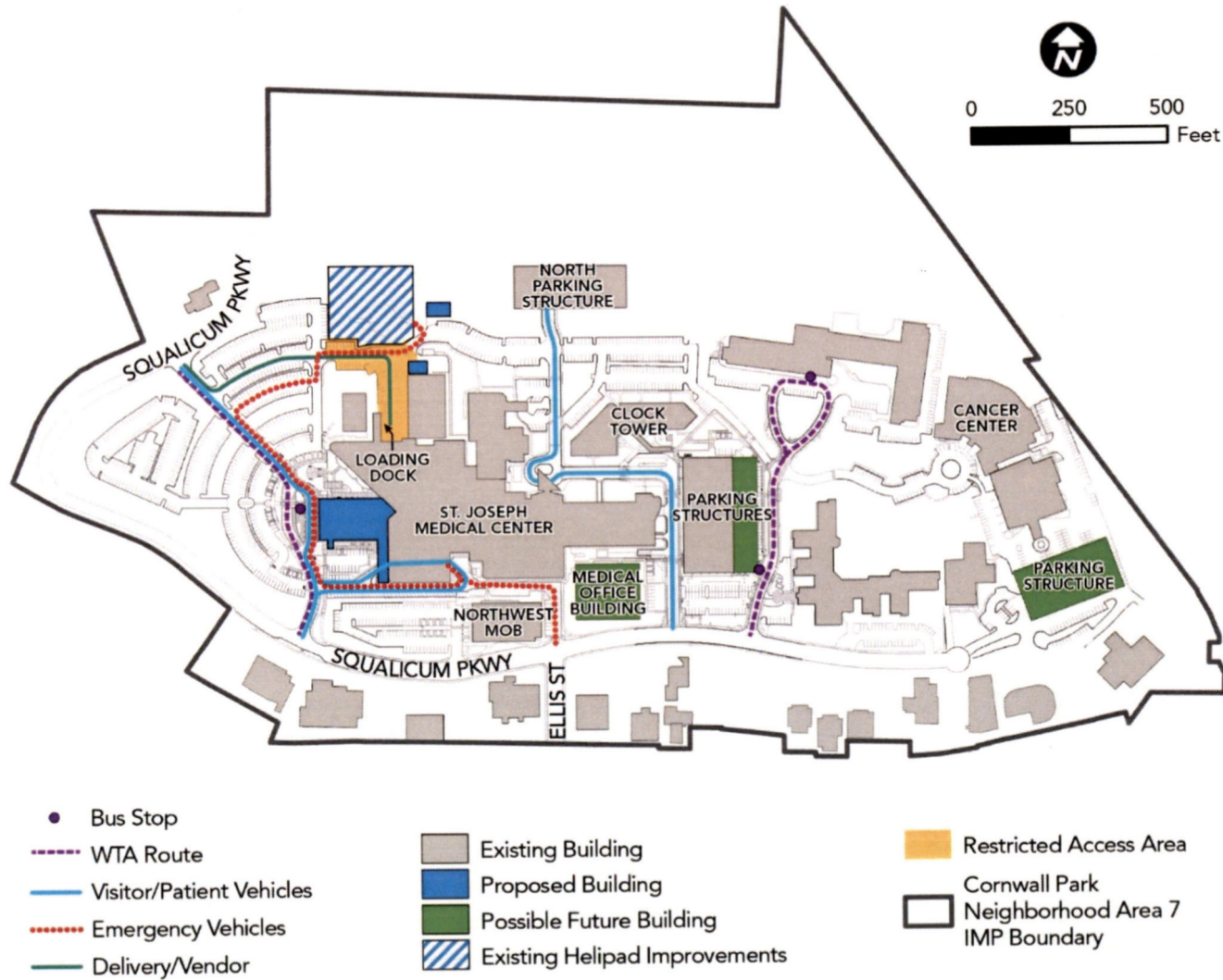
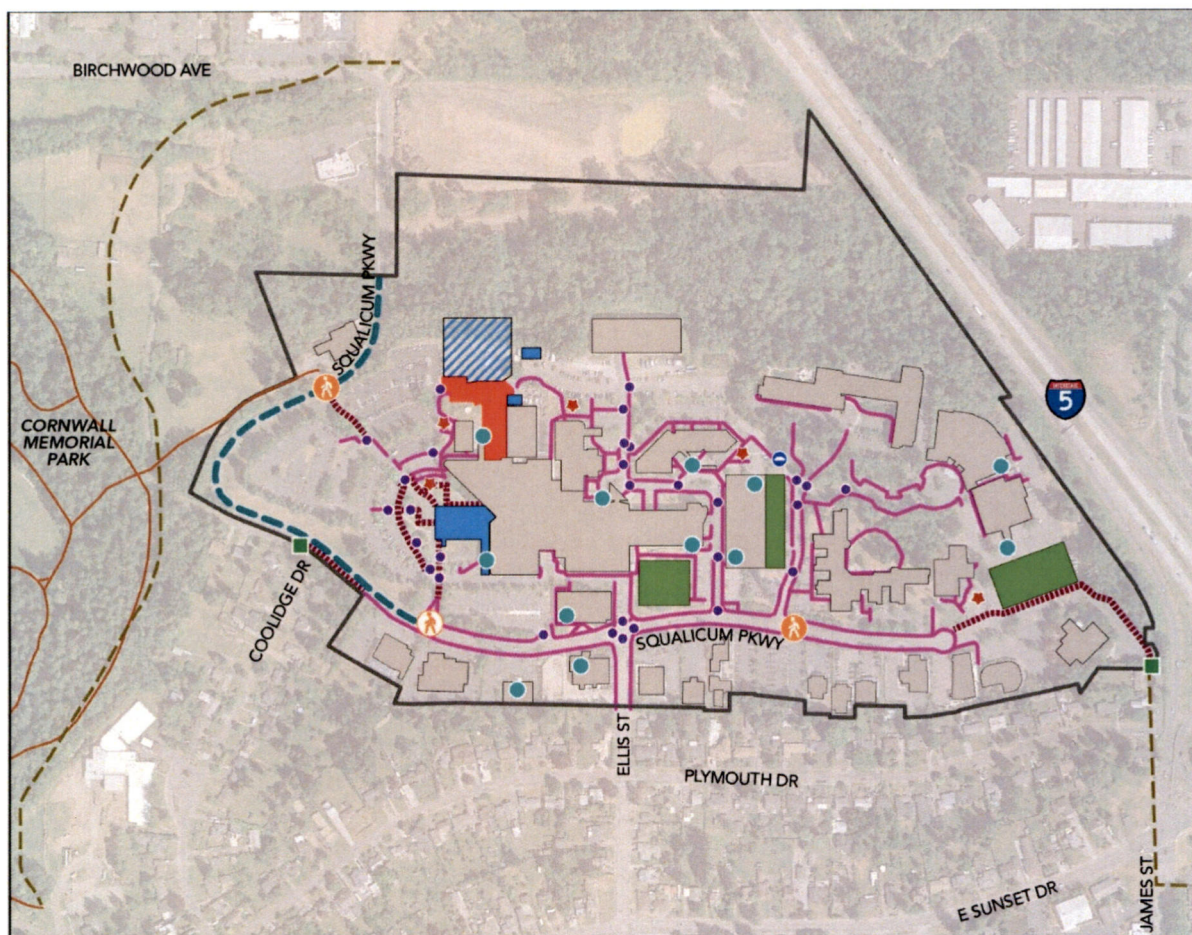


Figure 5 . Internal vehicular circulation



- Cornwall Park Neighborhood Area 7 IMP Boundary
- Existing Building
- Proposed Building
- Possible Future Building
- Existing Helipad Improvements
- Restricted Access Area

- Existing Bike Parking
- Existing Pedestrian Facility
- - - - - Proposed Pedestrian Facility
- Existing City Trail
- - - - - Proposed City Trail
- ⤴ Existing Enhanced Pedestrian Crossing
- ⤴ Proposed Enhanced Pedestrian Crossing
- Painted/Raised Crosswalk
- ⤴ Speed Table/Traffic Calming
- ★ Public Gathering Area
- Connection to City Trail
- Proposed Bicycle and Pedestrian Improvements

Figure 6. Pedestrian/Bicycle Connectivity

1. Pedestrian Amenities

Design and construction of planned development projects described in Subsection F will include sidewalks and lighting to promote easy and safe pedestrian movement around the Campus, particularly to/from the Medical Center and parking areas. Crossing opportunities will be carefully located and designed to concentrate crosswalk locations in key locations to promote safe walking and vehicular conditions throughout the Campus. Design features such as raised crosswalks, reflectors and/or signage will be considered to maximize the safety and visibility of pedestrians. New/enhanced pedestrian facilities (i.e., new sidewalks, raised crossings, new ADA curb ramps) will be constructed during Phase 1 as part of the site civil improvements for the West Pavilion (see Subsection F.1).

Landscaped areas around Campus buildings, entry points and transit stops will provide passive recreation opportunities. Benches and street furniture will be included to foster a comfortable walking environment.

Off-campus pedestrian connectivity will be promoted by adding limited amenities on or along Squalicum Parkway.

PeaceHealth and the City shall continue good faith discussions of PeaceHealth's proposal to construct an alternative bike and pedestrian route or routes through the hospital campus in lieu of constructing the $\frac{3}{4}$ street improvements to Squalicum Parkway. A similar alternative bike and pedestrian route may be constructed along the east side of Squalicum Parkway from the hospital's

northerly driveway access point to the southwest corner of the Open Space tract (zone three). The alternative may be approved by the City administratively, provided it achieves the same or similar level of bike and pedestrian connectivity, functionality and safety, and is located within a dedicated public access easement. PeaceHealth shall construct the approved alternative, if any, prior to completion of the West Pavilion during the First Phase of hospital development.

Extend curb, gutter, and sidewalk along the west side of Squalicum Parkway to provide a continuous sidewalk between Ellis Street and the Park trailhead at Coolidge Drive. Said improvements shall be completed prior to completion of any permitted project under the First Phase of hospital development.

Install an enhanced crossing to, and pedestrian landing at, the Daycare on the west side of Squalicum Parkway across from the northern entrance to the hospital and extend sidewalk within the hospital campus to connect with the new crossing. Such improvements shall be completed prior to completion of any permitted project specified under the First Phase of hospital development.

There shall be no vehicular access between Coolidge Drive and Squalicum Parkway.

In addition, a new marked crosswalk with flashing beacons is also proposed on Squalicum Parkway east of Ellis Street in the vicinity of the hospital east access driveway. The exact location will be determined at the time of permitting for a future development phase.

2. Bicycle Amenities

Design and construction of the internal circulation improvements will include bicycle wayfinding and shared lane markings as appropriate.

PeaceHealth and the City shall continue good faith discussions of PeaceHealth's proposal to construct an alternative bike and pedestrian route or routes through the hospital campus in lieu of constructing the $\frac{3}{4}$ street improvements to Squalicum Parkway. A similar alternative bike and pedestrian route may be constructed along the east side of Squalicum Parkway from the hospital's northerly driveway access point to the southwest corner of the Open Space tract (zone three). The alternative may be approved by the City administratively, provided it achieves the same or similar level of bike and pedestrian connectivity, functionality and safety, and is located within a dedicated public access easement. PeaceHealth shall construct the approved alternative, if any, prior to completion of the West Pavilion during the First Phase of hospital development.

Bicycle storage areas are currently located throughout the Campus near multiple building entries. As the Medical Center expands, new or relocated bicycle storage areas will be provided to promote easy access for cyclists. Installation of electric bicycle charging stations will be evaluated. A central bicycle storage area in the stand-alone parking structures will also be considered to provide staff covered and secure bicycle parking options.

D Helicopter Circulation

Emergency access to/from the Medical Center via helicopter will continue according to existing approvals. A new rooftop helipad is planned as part of the West Pavilion development for patient pick-ups and drop-offs, as described in Subsection F, and will be subject to environmental analysis and approval from the City of Bellingham. The City may apply appropriate mitigation measures after the environmental analysis takes place. The existing ground helipad on the north side of campus will remain in use for parking, refueling, maintenance, and training for medical, military, and U.S. Coast Guard helicopters.

Future operating procedures for medical helicopters will include start-up from the existing ground-level helipad, flight to patient, return flight to the new rooftop helipad on the West Pavilion for patient offload, liftoff from the rooftop, and landing at existing ground-level helipad. Helicopters traveling to and from the Campus will be subject to the Helipad Operating Guidelines outlined in Appendix C. Should relocation of the existing or proposed helipads prove necessary and/or desirable to improve Medical Center operations, the proposed site would be within the Hospital/Medical Zone 2. Any change of the existing or proposed locations may require environmental analysis and planned development approval from the City of Bellingham.

E Utilities

Presently, the IMP site is adequately served by public and private utilities. The planned development outlined in Subsection F, Phased

Development Schedule, will require campus expansion of the existing utilities to service the proposed buildings. The following is a brief description of the impacts that IMP projects proposed for St. Joseph Medical Center have on major utility systems (see Figure 7. Each project will require City of Bellingham planned development approval which includes a "Certificate of Concurrency for Transportation Facilities."

1. Water

The existing Medical Center campus has an extensive water system that combines both potable water and fire protection water supply in a looped system throughout the site. The looped water mains enable both potable and fire protection water delivery to the buildings through alternate routes, adding redundancy and increased flow efficiency to the system. Proposed facilities outlined in the IMP will utilize the existing infrastructure with minimal additions of new water mains to the existing Campus system.

Area 7, the IMP Area, is at a higher elevation with respect to the City's water pressure zone that supplies the Medical Center and other IMP buildings. Water pressure to the Campus is at the low end of the acceptable range. Buildings over two to three stories in height typically require booster pumps to meet the water pressure demands of the up-per floors. The larger, existing Medical Center buildings include sprinkler systems with booster pumps due to this circumstance. Future buildings and/or expansion of existing structures should continue this practice.

2. Sanitary Sewer

Sanitary sewer discharges from the Campus are routed south to the City-owned sewer main that runs along Squalicum Parkway. The main size varies from eight-inch diameter at the east end and increases in diameter to 12 inches at the west end of the zone. The present main appears to be adequately sized to convey the existing discharges and the additional flows associated with IMP improvements.

3. Stormwater

The City of Bellingham and the Washington State Department of Ecology regulate stormwater runoff associated with new development. These regulations address both water quality and quantity stormwater discharges from the developed areas with the main focus on impervious area. Stormwater treatment and detention issues on Campus will continue to be addressed individually for each new project.

The regulatory agencies have different requirements for re-development and new projects. Building expansions over existing impervious areas, such as asphalt parking areas or buildings to be demolished, will need to be reviewed on a case by case basis based on the agency regulations in place at the time the improvements will be made.

New structures to be constructed over existing vegetated or pervious areas will require more extensive stormwater improvements. The proposed parking structures will require their own water quality and detention facilities, to be sized

according to the specifics of the final building design and locational topographic conditions.

4. Natural Gas

Natural gas service is provided to the site by Cascade Natural Gas. Main lines, at 60 psi pressure, are located in Squalicum Parkway and Ellis Street. The campus buildings to the east of Ellis Street are serviced by a two-inch diameter line that crosses under I-5 and continues west along Squalicum Parkway to the Medical Arts Building. The Medical Center complex is serviced from the north and the south. A two inch diameter main enters the site from the south on Ellis Street. The main crosses Squalicum Parkway, continues north about 150', and stops just east of Building #21 Northwest Medical Center. (The main used to continue north but that portion was retired with the last Medical Center expansion.)

A four inch diameter main enters the site from the north on Squalicum Parkway, across from the Bellingham Childcare & Learning Center. The four inch main continues east approximately 250 feet where it is reduced to two inch diameter. The two inch line continues east along the service road north of the main buildings and turns south along the east side of the Medical Center.

Based on discussions with Cascade personnel, there is sufficient capacity in the existing system to handle the anticipated future growth. Meter sizes and their location on future buildings will need to be addressed during each building's final design and permit review. The Cascade system, which ends at each meter, does not have an automatic shut off valve that will close in the event of a

catastrophic failure (such as an earthquake). The Medical Center can get an earthquake valve, located behind the Cascade meter, if this is a concern.

5. Electrical

The proposed development is consistent with Puget Sound Energy's system. Puget Sound Energy has plans to continually expand its substation system and the IMP proposed plan fits with its proposed improvements. The Medical Center is primarily fed through the Plymouth substation, located south of the Medical Center, which also supplies Bellingham Cold Storage. Squalicum Parkway is fed through underground power lines.

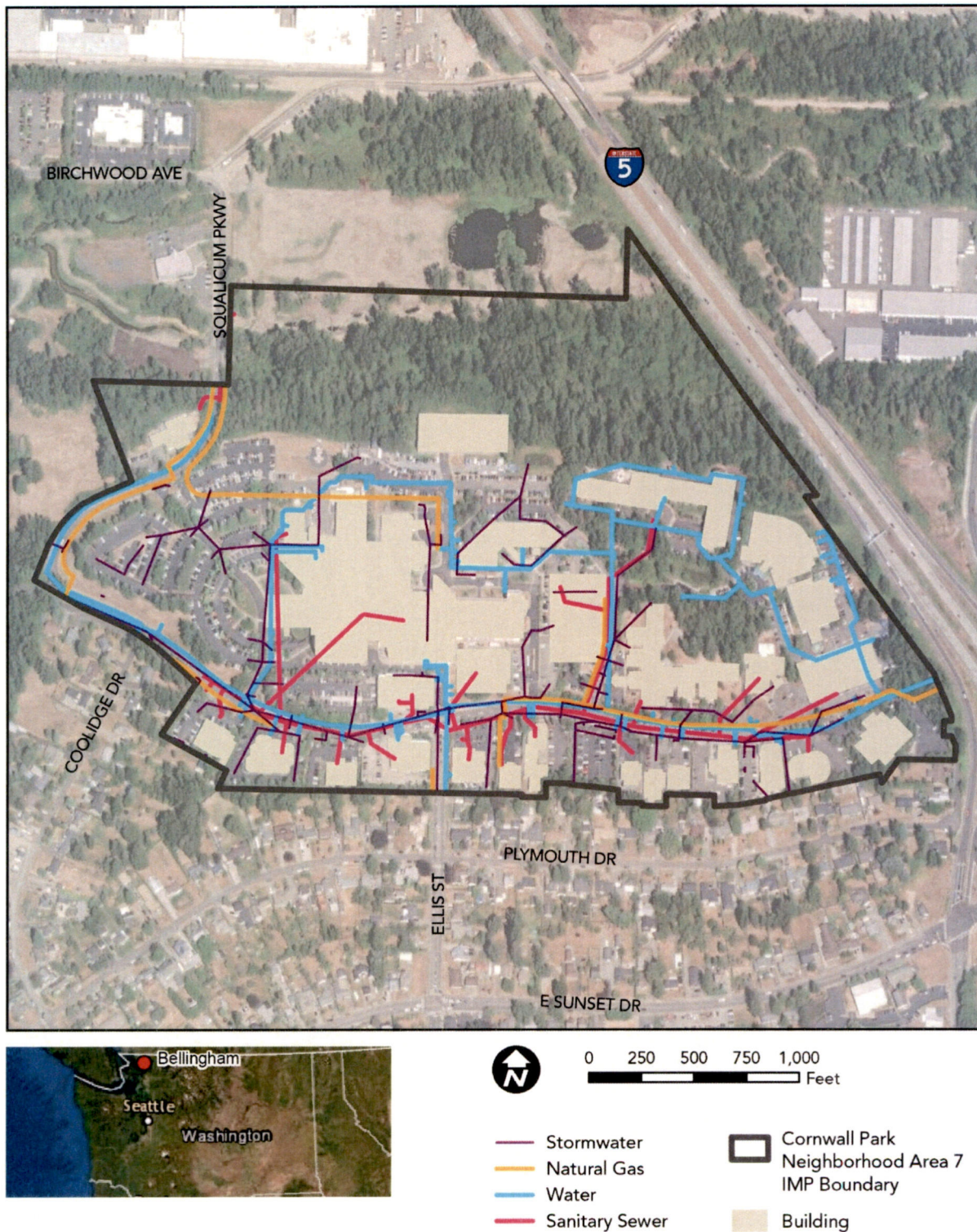


Figure 7. Utility Plan

F Phased Development Schedule

Several development projects are anticipated to be needed to meet the regional healthcare needs. The following project descriptions provide an approximate chronological overview of the significant major development (building and/or circulation) projects conceptually identified for St. Joseph Medical Center. In addition, smaller, unforeseen renovation projects may prove necessary to respond to Medical Center needs. Figure 8 illustrates the anticipated expansion of the Medical Center Campus.

Phase 1

See Section III.C and IV.H for a description of street improvements to be implemented in this phase.

1. West Pavilion

A new six-level, 120,000-square-feet (SF) addition to the west side of the Medical Center building features a rooftop helipad; a new main entrance and lobby; and expansion and upgrade to the emergency department, critical care, and birth and delivery services. Site civil improvements include a new patient drop-off area, reconfigured parking areas, new/enhanced pedestrian facilities, and a new bus stop location. Construction is expected to begin in 2024.

2. Remodel of North and South Patient Pavilions

As Medical Center operations are transitioned into the new West Pavilion, the existing facilities would be remodeled to expand the emergency

room capacity and to add new, updated bed space and nurse station areas. Construction is anticipated to occur concurrently with and after completion of the West Pavilion project.

3. Central Utility Plant Addition

The Central Utility Plant (CUP) is the hub of the mechanical, electrical, and plumbing systems for the campus. To accommodate the new West Pavilion operations, an approximately 1,000-SF expansion of the existing CUP is anticipated. Construction is expected to occur in 2023.

4. Airlift Northwest Bellingham Base and Ground Helipad Improvements

A new approximately 1,800 SF modular building just east of the existing ground helipad is proposed to provide office, training and rest space for Airlift Northwest flight crews. This building would replace the existing trailer used for office and rest space. The existing ground helipad would receive improvements to comply with current Federal Aviation Administration regulations.

Future Potential Projects

5. Internal Remodel of Existing Unit

The vacated Childbirth Center would potentially be remodeled into additional medical-surgical units.

6. New Medical Office Building

A new three-story Medical Office Building could be built to replace the building at 3001 Squalicum Parkway (known as the Bunker Building). Medical offices from the Bunker

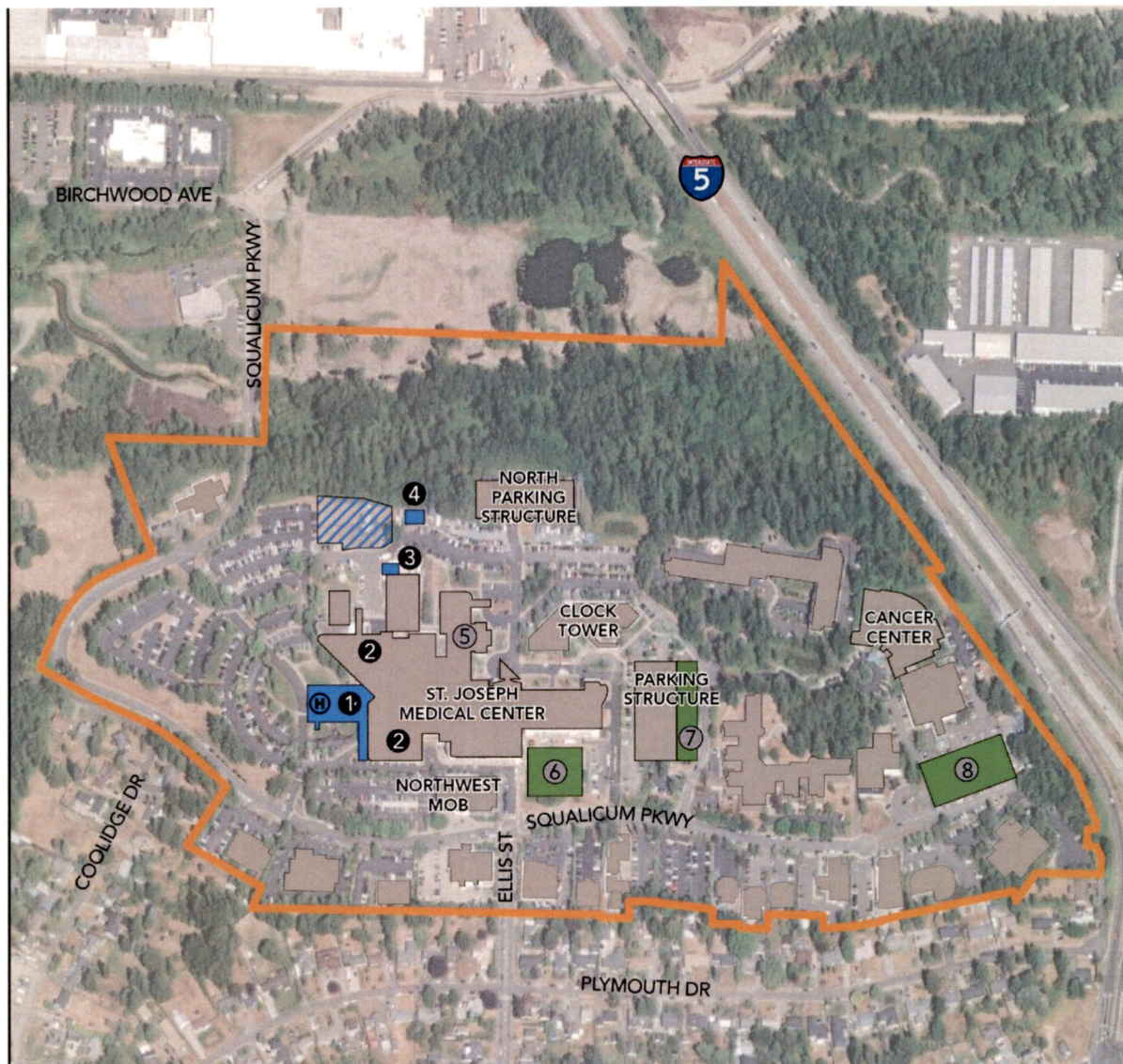
Building would be relocated to the New Medical Office Building upon completion. Once vacated, the Bunker Building would be demolished. The building is anticipated as an approximately 45,000 SF addition to the Medical Center, adjacent to the east side of the existing East Tower and would provide internal connections to the main Medical Center building. Additional parking is anticipated to be required, which may be accommodated through an expansion of an existing parking garage or construction of a new parking garage. At this time, the number of stalls to be added has not been clearly identified. A preliminary conservative (low) estimate of net new stalls added would be approximately 200 new parking stalls.






7 & 8. New and/or Expanded Parking Structures

An expansion to the Main Parking Garage and/or a new parking structure on the east side of campus may be constructed to accommodate future growth in medical buildings and would be ADA accessible.

Additions/Modifications of Existing Buildings

The interior remodel of existing buildings or the addition of up to ten percent (10%) of overall existing square footage to an existing building do not require planned development approval but said construction shall be required to comply with all other applicable building and fire code requirements.



-  Cornwall Park Neighborhood Area 7 IMP Boundary
-  Existing Building
-  Proposed Building
-  Possible Future Building
-  Existing Helipad Improvements



0 250 500 750 1,000 Feet

- ① West Pavilion: 6-floor Addition with Rooftop Helipad
- ② Remodel of North and South Patient Pavilions including Emergency Department and Nursing Units
- ③ Central Utility Plant Addition
- ④ ALNW Building
- ⑤ Internal Remodel of Existing Unit
- ⑥ New Medical Office Building
- ⑦ Parking Structure Extension
- ⑧ Parking Structure

Figure 8. St. Joseph Medical Center Proposed Major Development Projects

G Open Space

The majority of the Institutional Zone is currently developed in built facilities and/or associated parking. Open space for active or passive use is provided immediately around most existing facilities, in the eastern portions of Zone 2 and to the north, in Zone 3. St. Joseph Medical Center granted a perpetual easement (AF#2020400010) to the City of Bellingham allowing for conservation, enhancement and public access to Zone 3. Figure 9 illustrates the open space areas within the IMP area.

1. Open Space Requirements

At least 20% of the Institutional Master Plan area must be maintained as open space. The open space areas shall include, but not be limited to, land left in the natural state, landscaping,

landscaping associated with streets and sidewalks, gardens, parks and outdoor exercise facilities. All non- Medical Center applicants shall be required to set aside 20% on-site as part of the required development plans unless the City administratively approves a lesser amount in accordance with their adopted policies. St. Joseph Medical Center's open space requirements for further development are satisfied by the open space preserved in Area 3.

2. Opportunities in Landscaped Areas

PeaceHealth will evaluate opportunities for growing fruits and vegetables in viable landscaped areas on the Medical Center campus. These efforts will be undertaken in partnership with organizations that can provide assistance and/or resources to implement these opportunities.

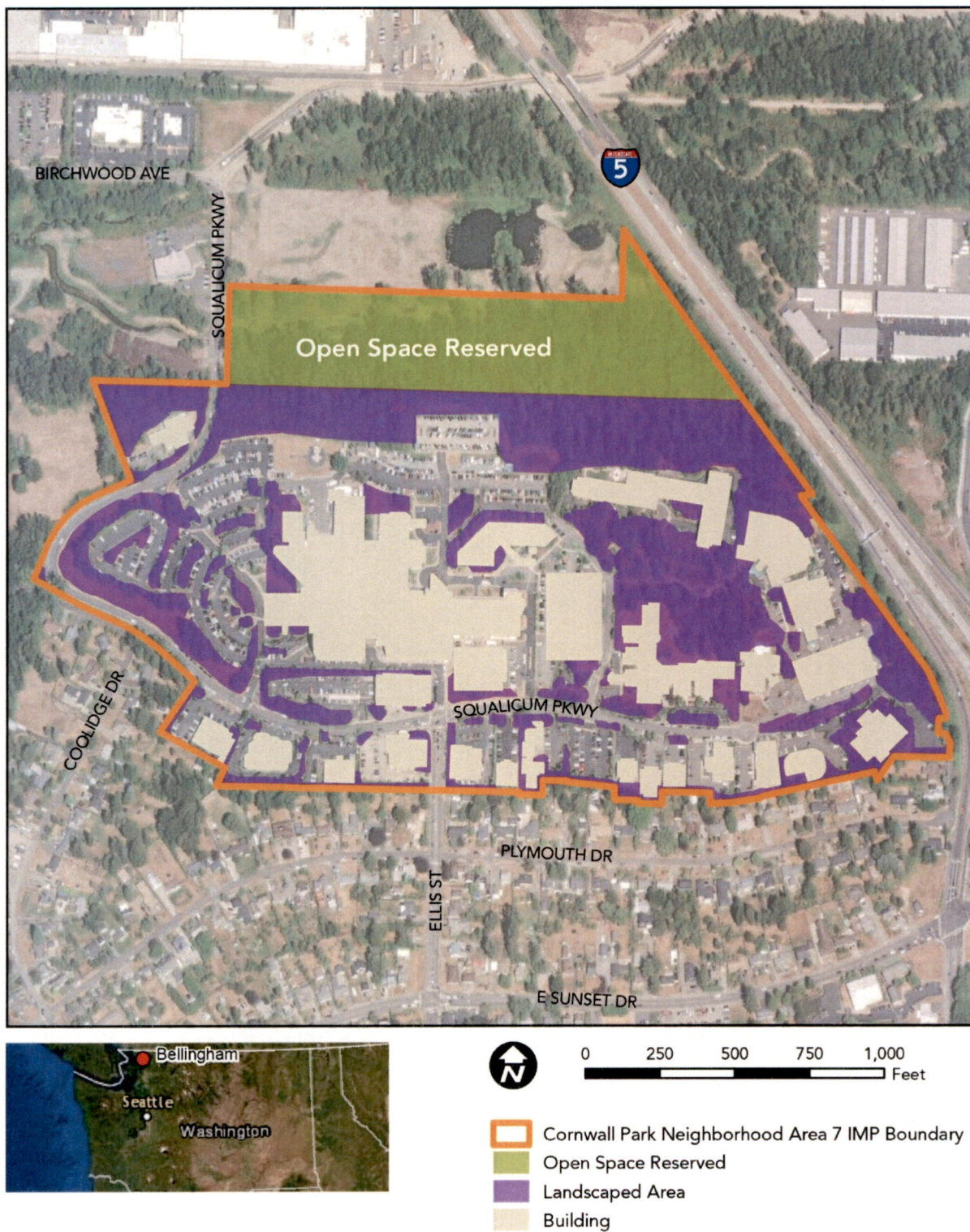


Figure 9. Open Space Plan

IV. STANDARDS

A Permitted Uses

Area 7 is subdivided into three primary zones of (existing) land use and intent, as illustrated previously in Figure 2. Zone 1 consists of Medical Support uses that benefit from immediate proximity to the Medical Center while having minimal impact on the adjacent residential neighbors. The Medical Center campus and related medical uses comprise Zone 2, most of which lies more than 200' from adjacent residential areas. Zone 3 consists of natural open space area between the Campus and the Squalicum Creek restoration area (formerly Bug Lake) that was made open to the public via a perpetual easement granted to the City of Bellingham in 2002.

The uses specified are intended to encompass health care needs within the Bellingham and greater Whatcom County communities and be regarded as flexible in their interpretation to adapt to new medical/dental technologies and practices as they are developed. Ancillary uses such as health care related retail, educational facilities and associated parking are intended to support the primary, medical/dental uses of the Institutional Zone. Permitted Uses within each zone are defined in the following text.

1. Zone 1: Medical Support – Principal Uses

- a. Medical clinics, offices
- b. Dental clinics, offices

- c. Health care related retail, including food and beverage service as an ancillary use
- d. Any permitted and/or conditional uses allowed in a Residential Single Zone.

2. Zone 2: Hospital/Medical – Principal Uses

- a. Medical Center and all primary health care (acute in-patient, long-term clients, outpatient diagnostic and treatment services)
- b. Medical and dental clinics, offices
- c. Health care related retail
- d. Day care facilities
- e. Health care related residential uses
- f. Service care, day treatment and child placing agencies
- g. Public utilities, exclusive of storage yards
- h. Public buildings and uses
- i. Food and beverage service as an ancillary use
- j. Private clubs and lodges
- k. Neighborhood clubs and activity centers
- l. Branch post office and banking facilities (excluding drive through service) within medical care facilities
- m. Personal service facilities within medical care facilities
- n. Laundry and dry cleaning establishments within medical care facilities
- o. Florist shops within medical care facilities

- p. Health, fitness and recreational clubs
- q. Educational/Seminar facilities
- r. Parking facilities
- s. Helicopter pad and accessory uses
- t. Wireless communication facilities
- u. All other uses allowed in the Residential Single Zone.

3. Zone 3: Open Space – Principal

- a. Natural and/or landscaped open space.

Similar uses as listed in Zones 1 through Zones 3 may be permitted upon Planning Director approval.

B Building Height Limitations

- 1. No structure shall exceed 35' under definition (1) when within 200' of the site plan boundary, which lies adjacent to a Residential Single general use type.
- 2. Except for the limitation above, there is no expressed general height standard in the Institutional Zone.

C Site Coverage Limitation

- 1. There is an 80% coverage limitation for planned projects within the Institutional Zone.

D Open Space Requirements

At least 20% of the Institutional Master Plan area must be maintained as open space. The open space areas shall include, but not be limited to, land left in the natural state, landscaping, landscaping associated with streets and sidewalks, gardens, parks and outdoor exercise facilities. All applicants shall be required to set aside 20% on-

site as part of the required development plans unless the City administratively approves a lesser amount in accordance with their adopted policies.

E Setback Requirements

1. Front Yard Setback

- a. None required unless vision clearance is necessary for traffic safety.

2. Side Yard Setback

- a. A side yard setback of 10' is required for sites abutting a flanking street. The setback is to be measured from the adjacent right-of-way to the structure's foundation.
- b. Except for the condition above, a side yard setback of 5' from the property line to the foundation of the structure is required.

3. Rear Yard Setback

- a. A rear yard setback of 25' is required for properties within Zone 1. The setback is to be measured from the structure's foundation to the adjacent property line. Eaves may penetrate over the yard area; however no projection may extend more than 5' into the yard.
- b. Except for the condition above, a rear yard setback of 10' is required.

4. Internal Setback

- a. The internal setback between buildings located within Zone 2 may be less than 5' upon administrative approval where the two properties are in common ownership. A setback less than 5' may require structural modifications in order to achieve compliance with Uniform Fire and Building Code requirements.

5. Critical Area Buffers

- a. Critical area buffers and building setbacks will be in accordance with City of Bellingham regulations and determined for each new project.

F Landscape Requirements

1. General Provisions

- a. This section provides the landscaping requirements for all uses permitted within the Institutional zone district.
- b. Prior to issuance of a building permit, a scaled landscape site plan shall be submitted and approved by the Planning Department consistent with the provisions herein. Said plan shall specify species name, size and location.
- c. Landscaping pursuant to the approved site plan shall either be installed or bonded for (in an amount no less than 150% of cost of material and installation) prior to issuance of a certificate of occupancy or, if no certificate is required, prior to final inspection approval.
- d. A maintenance contract with a reputable landscape firm shall be required. The contract shall also be for 2 years and be filed with the City Clerk.
- e. Those existing trees that will be saved, if they meet the minimum specification herein specified, shall count toward meeting the requirements herein, provided they are of an acceptable species.

2. Requirements

- a. Street Trees

One street tree shall be required for every 25 feet of street frontage abutting the property. Said trees shall be installed adjacent to the right-of-way within the property lines or within the right-of-

way subject to the approval of the Public Works and Parks Department.

- b. Freeway Trees

One tree for every 25 feet of freeway frontage shall be installed along that frontage. This provision applies only where trees do not already exist on property adjacent to the freeway. It also applies only adjacent to new development which is occurring adjacent to the freeway.

- c. Parking

- (i) For every 5 surface parking spaces, 1 tree shall be planted around the facility perimeter. These trees may be grouped or spread linearly.
- (ii) Parking space separation areas as required shall be landscaped.
- (iii) Areas between the parking facility and adjacent property shall be landscaped if the adjacent property is of the same general use type. If the adjacent property is of a Residential General use type, said area shall be screened.

- d. Yards

- (i) Yards adjacent to Residential Single use areas shall be landscaped with a screen and a 6 foot high landscaped berm or fence, wall of trees, or a similarly effective buffer as approved by the Planning Director.

3. Standards

- a. Street/Freeway Frontage Trees

- (i) Species: Street or freeway frontage trees shall be of a species recommended in the
- (ii) Bellingham Street Tree Plan and approved by the Parks Department.

(iii) Size: Street or freeway frontage trees shall be no less than 10' in height at time of installation with a minimum caliper size of 2½" measured 1' above grade.

(iv) Spacing and Location: Street or freeway frontage trees shall be spaced and installed as recommended in the Bellingham Street Tree Plan subject to approval of Public Works and Parks Department.

b. Other Required Trees

(i) Species: Other required trees shall be native to the area or recognized as being easily adaptable to the climate.

(ii) Size: Other required trees shall be no less than 6' in height at time of installation with a minimum caliper size of 1" measured 1' above grade.

(iii) Spacing and Location: Other required trees may be installed where desired by applicant within the general constraints of this section.

G Parking & Loading Requirements

1. General Provisions

- a. General Provisions, Design Provisions and Improvement Standards for off-street parking shall conform to those described in City of Bellingham Municipal Code 20.12.010. Loading Design Standards shall conform to those described in City of Bellingham Municipal Code 20.12.020.
- b. Joint use parking may be permitted on a case-by-case basis by the Planning Director.
- c. A minimum of one parking space and not less than one additional parking space for every 30 required spaces shall be sized and marked as

accessible. (Subject to all City of Bellingham standards.)

2. Minimum Number of Parking Spaces Required

The following parking space requirements are minimum standards and apply to all future development projects subsequent to the adoption of the IMP and do not apply to previously approved projects. Current City parking space requirements shall be followed for any land uses not listed below.

- a. Hospitals: 1 per every 2 patient beds
- b. Medical Care Centers: 1 for every 4 beds
- c. Medical/Dental Offices, Associated Labs: 5 per 1,000 gross floor area
- d. Boarding House, Hotel: 1 for every 2 bedrooms
- e. General Business, Personal Service: 1 for every 250 assignable square feet of building area (ASF) open to the public
- f. Private Clubs: 1 for every 150 ASF of assembly area; 1 space for each 125 ASF of eating/drinking facilities
- g. Neighborhood Club, Activity Center: 1 for every 150 ASF

3. Number of Loading Berths Required

Any building intended to be used for retail, warehouse, freight or hospital uses shall be provided with off-street loading berths according to the following schedule:

- a. 1 berth for each building containing 10,000 to 25,000 ASF
- b. 2 berths for each building containing 25,000+ ASF

Buildings containing 20,000 to 50,000 ASF of other uses shall be provided with 1 off-street loading berth.

H Street Standards

There shall be no vehicular access between Coolidge Drive and Squalicum Parkway. See Section III.B, III.C, and III.F for a description of street improvements to be implemented with phased development.

Install $\frac{3}{4}$ street improvements (bike lane, curb, gutter, and sidewalk) along the east side of Squalicum Parkway from the hospital's south entrance to the southwest corner of the Open Space tract (Zone Three). Said improvements shall be completed prior to completion of the West Pavilion during the First Phase of hospital development.

PeaceHealth and the City shall continue good faith discussions of PeaceHealth's proposal to construct an alternative bike and pedestrian route or routes through the hospital campus in lieu of constructing the $\frac{3}{4}$ street improvements to Squalicum Parkway. A similar alternative bike and pedestrian route may be constructed along the east side of Squalicum Parkway from the hospital's northerly driveway access point to the southwest corner of the Open Space tract (zone three). The alternative may be approved by the City administratively, provided it achieves the same or similar level of bike and pedestrian connectivity, functionality and safety, and is located within a dedicated public access easement. PeaceHealth shall construct the approved alternative, if any,

prior to completion of the West Pavilion during the First Phase of hospital development.

I Signage Standards

1. All signage must be an integral coordinated part of a sign design plan for the entire complex.
2. Roof signs are prohibited.
3. No signs shall be visible from Interstate 5.
4. No lighted signs shall be directly visible from Residential Use areas.
5. No signs shall be located in vision clearance triangles.

J Lighting Standards

Lighting plans must be included in all development applications involving major building and/or circulation improvements and will be approved on a project by project basis. Plans must include the following elements for consideration:

1. A photometric site plan, drawn to scale, showing proposed buildings and/or parking, mounting and pole height and including all proposed exterior lighting fixtures and footcandle spread.
2. Design specifications for all proposed lighting fixtures to include photometric data, cutoff fixtures, bulb wattage/type, and other descriptive information.
3. Outside parking lot lighting shall not be less than 0.5 footcandles per IES minimum lighting standards at the property line and shall be designed to minimize glare and spillover into adjacent properties.

4. Wall packs on buildings may be used at entrances to a building to light unsafe areas. Wall packs are not intended to draw attention to the building or provide general building or site lighting. Wall packs must be fully shielded to direct the light downward with maximum bulb wattage limited to 100 watts.
5. Building and aesthetic lighting must be shielded to prevent direct glare and/or light trespass in excess of 0.5 footcandles. The lighting must also be, as much as physically possible, contained to the site area.

K Accessible Access

In addition to requirements in the Building Code and parking standards for accessible access, development within the Institutional zone district shall meet the following standards:

1. There shall be paved ramps from parking areas to walkways, easily accessible to accessible parking spots and constructed to accommodate wheelchairs.
2. Paths and walkways shall be constructed to widths and with materials which will accommodate accessibility.

L Modifications

Building requirements set forth in this plan, except for the 25 foot rear yard setback in Zone 1 (abutting the single family zone) and the 35 foot height limit when within 200 feet of a residential single zone, may be reduced by approval of the Planning Director upon a finding that there are valid reasons to reduce the standard and there is minimal harm to the public.

M Cultural Resources

There are no known buildings, structures, or sites located on or near the IMP site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers. There are no known landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or within 0.25 miles of the IMP site. However, the Washington Department of Archaeology and Historic Preservation's (DAHP) Statewide Predictive Model identifies the eastern portion of the SJMC campus, including the existing main hospital building, as a "moderate risk" probability for discovery of archaeological resources

If archaeological materials are encountered during construction, an archaeologist would immediately be notified, and work halted in the vicinity of the find until the materials can be inspected and assessed in regard to using the National Register of Historic Places criteria. In the event of inadvertently discovered human remains or indeterminate bones, work must stop immediately. Any remains should be covered and secured against further disturbance and communication established with proper law enforcement with jurisdiction, the State Archaeologist or State Historic Preservation Officer (SHPO), and any consulting Tribes. Inadvertent discovery plans shall be prepared and kept on individual project sites for all future projects that include ground disturbance.

V. APPENDICES

A Appendix A

Public Meeting Notices

B Appendix B

Environmental Checklist, 2022

Attachments to Appendix B

- A. Geotechnical Engineering Report, PeaceHealth St. Joseph Medical Center West Tower, Aspect Consulting, LLC, 2021
- B. Transportation Impact Analysis, TENW, 2022
- C. Community Noise Study Report, WSP, 2022
- D. Cultural Resource Desktop Review of the PeaceHealth St. Joseph Medical Center Institutional Master Plan Amendment, Bellingham Washington; Drayton Archaeology, 2022
- E. Preliminary Third-Party Review of Community Noise Report, AECOM, 2023
- F. St. Joseph Medical Center Noise Control Considerations, AECOM, 2023
- G. Revised Community Noise Study Report, WSP, 2023

C Appendix C

Helipad Operating Guidelines

**Exhibit B for
Final Adopting Ordinance**

**BELLINGHAM PLANNING COMMISSION FINDINGS OF FACT,
CONCLUSIONS AND RECOMMENDATIONS**

AUGUST 3, 2023

SUMMARY

In June 2022, Peace Health submitted a request for approval of an update to their Institutional Master Plan (IMP) for Cornwall Park Neighborhood Area 7, PeaceHealth – St. Joseph Medical Center (SJMC), which was last adopted in 2006. The proposed SJMC IMP will continue to guide the growth of the 87-acre campus in a coordinated fashion in order to meet medical and community demands over the next two decades. Throughout these findings, the applicant will be referred to as SJMC, PeaceHealth, or St. Joseph's.

After consideration of the materials provided for the July 6, 2023 public hearing and for the August 3, 2023 work-session, the Bellingham Planning Commission has determined that the proposed amendments to the IMP, as conditioned, are consistent with applicable goals and policies in the City's Comprehensive Plan and the Cornwall Park Neighborhood Plan. Furthermore, the Bellingham Planning Commission has determined that, as conditioned, the proposed amendments to the IMP are consistent with the institutional master plan general provisions in BMC 20.40 (Article I) and specifically, consistent with the intent of the Institutional land use designation specified in BMC 20.40.020(A) and the purpose enumerated in subsection (B)(1-5). The Planning Commission finds that this requirement has been met, provided that the specific recommendations in these findings of fact and conclusions are approved. The Bellingham Planning Commission recommends that City Council approve the proposed update as conditioned in section III, Recommendation.

I. FINDINGS OF FACT

1. Proposal Description:

The proposed update to the IMP includes: a reconfigured campus development plan and phasing schedule that includes a new West Pavilion and rooftop helipad, additions to and remodels of existing buildings and facilities, future development of a new medical office building and new parking garage on the PeaceHealth campus east of Ellis Street, and upgrades to support facilities and safety improvements at the existing ground level helipad. Clarification on the timing of completing associated street improvements around the campus are also proposed. Certain elements within the existing IMP such as "Circulation", "Phased Development Schedule", and the regulations for street improvements are proposed to be amended to facilitate this update.

The existing IMP boundaries, internal zoning areas, permitted uses, development regulations (except those pertaining to street improvements), and open space areas are not proposed to be changed.

2. Background Information and Procedural History:

Background. This proposal is to update an Institutional Master Plan (IMP) that will continue to guide growth of the 87-acre medical campus over the next two decades.

The Institutional Development Chapter, BMC 20.40, requires an IMP when large campus-type quasi-public uses exceed 50 acres so that development is done in a planned and coordinated manner. The IMP is the policy document with which all new development on the SJMC campus is reviewed. Specific projects are reviewed by the City through a planned development permit (institutional site plan) approval that includes additional environmental review under SEPA (referred to as 'land use approval'). Planned development review requires that a neighborhood meeting is held on project specific proposals prior to submitting land use applications. A building permit review process takes place after land use approvals to ensure consistency with the regulations and standards in the IMP.

An IMP has guided development for the SJMC main medical campus in Area 7 of the Cornwall Park Neighborhood since 1983. According to the applicant, since the adoption of the 2006 IMP, there has been an increased demand for medical procedures and acute hospital services due to population growth and the COVID-19 pandemic. Additionally, an overall shift towards single-patient rooms, rather than shared, requires additional or remodeled floor space to accommodate patient needs. The applicant indicated that trends show a higher number of routine procedures that used to require stays in the hospital are now performed in clinic and outpatient surgical facilities. Therefore, PeaceHealth is focusing on development to improve patient services, expand the emergency department, and upgrade and expand the neonatal, pediatrics, and women health services.

Procedural History. Prior to initiation of the 2022 IMP amendment process, two meetings were held with the applicant and the Cornwall Park Neighborhood Association. There was an in-person presentation to the Cornwall Neighborhood Association Board in July 2021 and a virtual presentation to the full association at its regular fall meeting in September 2021.

On November 23, 2021, the City of Bellingham held a preapplication conference with the Peace Health team on the proposed IMP.

On December 8, 2021, the Planning and Community Development Department (PCDD) specified that the Director would initiate the process for the Type V-A process to amend the IMP.

On April 20, 2022, PeaceHealth held a virtual pre-application neighborhood meeting.

On May 17, 2022, the PCDD directed PeaceHealth to submit application materials for the proposed IMP amendment.

On June 2, 2022, PeaceHealth submitted an application for the IMP Amendment.

On July 7, 2022, the PCDD issued a notice of complete application.

On July 21, 2022, the PCDD issued a notice of application. A 30-day comment period was provided ending on August 20, 2022. This was provided to property owners within 500-feet of the IMP boundary, posted on site in two locations and broadcast on the PCDD's public notices webpage. During the comment period, it was discovered that there were a significant number of surrounding property owners who were not provided notice. Therefore, the City "re-issued" a notice of application on August 3, 2022. The 30-day comment period ended September 2, 2022. A substantial number of public comments were provided during and after the comment period expired on September 2, 2022.

Based upon the public comment and additional City staff review, a request for information was issued to the applicant on November 4, 2022.

On January 17, 2023, the applicant provided the requested information.

On February 9, 2023, the City issued a notice to proceed to AECOM Technical Services to conduct third-party review of WSP's May 2022 Community Noise Study Report (CNSR) that was provided by the applicant to the City as part of the original application.

On April 5, 2023, AECOM submitted their preliminary third-party review of the CNSR to the PCDD and on April 11, 2023, submitted their preliminary noise control (mitigation) recommendations.

On April 27, 2023, WSP submitted their responses to AECOM's review to the City.

On approximately May 1, 2022, WSP submitted their Revised CNSR to the City.

On June 21, 2023, the City issued a SEPA determination of non-significance on the proposed IMP amendments (SEP2022-0028). A 14-day comment period was provided ending on July 6, 2023. The SEPA review process and environmental determination of non-significance is discussed further in Section VII below.

On June 21, 2023, the City issued a notice of public hearing before the Planning Commission – scheduled for July 6, 2023, at 7:00 PM in the City Council chambers in City Hall at 210 Lottie Street in Bellingham. Said notice was published in the newspaper, posted on the City's webpage, emailed and mailed to parties of record including the Cornwall Park Neighborhood representatives.

On July 6, 2023, the Commission held the public hearing where they considered the materials provided in the staff report and exhibits, took oral testimony from the applicant, city staff and the general public. After oral testimony was completed, the Planning Commission closed the comment period for oral testimony but kept the written comment period open until July 20, 2023.

Between July 6 and July 20, 2023, additional written public comments were submitted to the PCDD. Between July 20 and July 28, 2023, the applicant and city staff prepared responses to the comments received and provided those responses to the Planning Commission members and the general public prior to the work session scheduled for August 3, 2023.

On August 3, 2023, the Planning Commission recommended approval of the proposed IMP update subject to the conditions specified herein.

3. Comprehensive Plan Goals and Policies / Cornwall Park Neighborhood Plan

The Planning Commission finds that the proposed update, as conditioned herein, is consistent with the following goals and policies of the Comprehensive Plan:

- GOAL LU-3: Support a thriving local economy across all employment sectors.
- GOAL LU-4: Maintain and enhance publicly-owned assets and institutional uses.
 - Policy LU-32: The Institutional designation is appropriate for areas containing public or quasi-public institutional uses requiring large land

area. Bellingham is home to several large “institutional” public or quasi-public campus-type developments such as Western Washington University (WWU), Whatcom Community College (WCC) and St. Joseph’s Hospital.

- Policy LU-35: Promote equitable delivery of, and access to, human services by allowing these uses in suitable locations and encouraging their creation through incentives and other innovative measures.
- Policy LU-36 Foster access to quality health and childcare through programs that are compatible with households’ economic resources and supported by public and private resources.
- GOAL LU-5: Support the Growth Management Act’s goal to encourage growth in urban areas.
- GOAL ED-1: Build and maintain a positive and competitive business-friendly climate that will retain, grow, and attract high-quality businesses.
 - POLICY ED-12: Continue to support the expansion and infrastructure needs of Western Washington University, Whatcom Community College, Bellingham Technical College, the Bellingham School District, PeaceHealth (St. Joseph’s Hospital medical facilities), the Port of Bellingham and other major employers that offer a diverse range of living wage jobs.
- GOAL T-1: Limit urban sprawl by linking land use and transportation planning.
 - Policy T-2: Balance land use efficiency with transportation safety and mobility by prioritizing street connectivity within the City limits, mobility for people and goods, and high-occupancy vehicles over single-occupancy vehicles (SOVs).
- GOAL T-2: Provide safe, well-connected, and sustainable mobility options for all users.
 - Policy T-5: Connect missing links within the Citywide multimodal transportation network for all modes of transportation network for all modes of transportation, including pedestrian, bicycle, transit, bus, freight trucks, and private automobiles.
 - Policy T-6: Design multimodal transportation improvements on existing and new streets with the safety and mobility needs of all user groups considered and with priority emphasis placed on the most vulnerable user groups.
- GOAL T-3: Increase infrastructure for bicycles, pedestrian, and non-single-occupancy vehicle modes of transportation.
 - Policy T-9: Incorporate sidewalks, crosswalks, and bikeways identified in the Pedestrian and Bicycle Master Plans into all transportation capital improvements on public streets, wherever feasible.
 - Policy T-11: Require all new development to construct sidewalks on all public streets identified as part of Bellingham’s Citywide Pedestrian or Transit Network per City street standards (BMC 13.04). Where possible, sidewalks should be

separated from roadways with landscape strips, street trees, rain gardens, or other low impact development techniques.

- Policy T-12: Require all new development to construct bike lanes on all arterial streets identified as part of Bellingham's Citywide Bicycle Network per City street standards (BMC 13.04). Where possible, bike lanes should be constructed of pervious asphalt or concrete.

The Planning Commission finds that the proposed update, as conditioned herein, is consistent with the following goals statements in the Cornwall Park Neighborhood Plan:

OPEN SPACE SECTION:

- The Squalicum Creek flood plain has Cornwall Park Neighborhood 4 value for recreation and as fish and wildlife habitat. Hillside slopes provide scenic backdrops, which give the community character and can be used as "buffers" between conflicting land uses.
- Existing patterns of use by bicyclists and pedestrians should be enhanced and improved by providing missing sections of sidewalk, planting street trees and similar actions.

CIRCULATION:

- The general purposes of bicycle improvements in Bellingham are to improve conditions on existing streets serving as bicycle commuter routes and to provide a variety of off-street, recreational, and potential commuter routes.
- The goal of the program is to provide opportunities for safe cycling on existing streets to serve both the recreational and commuter bicyclists.

AREA 7:

Issues associated with development of a major health care campus, surrounding St. Joseph's Hospital, are significant. A coordinated approval process rather than approval of individual projects has been developed through the adoption of an Institutional Master Plan. The medical professionals' and the medical consumers' interests are well-served by the Institutional Master Plan mechanism which stresses longer range goals and relies upon forecasts of space needs for utilities, traffic, and Cornwall Park Neighborhood 14 institutional uses.

Area 7 is designated as Institutional with a use qualifier of Planned Health Care Campus. Under this proposal, the hospital and the associated property owners have developed a statement of future needs, and commissioned a facilities development plan with building bulk, landscaping, circulation and parking, utilities, and phasing elements.

This document ensures for the City and the health care administrators that individual decisions are made in the larger context of site and time. A thoughtful site design approach in the front end incorporates landscaped buffers, adequate circulation routes, and development sites in a manner that maximizes efficient use and limited capital dollars.

4. Public Comment:

Staff received public comment throughout the process from as far back as the April 20, 2022, neighborhood meeting up until the scheduled public hearing on July 6, 2023. The Planning Commission kept the written public comment period open until July 20, 2023. Additional public comments were provided up to this deadline and provided to the Planning Commission prior to the August 3, 2023 work session.

5. State Environmental Policy Act (SEPA) Determination

On June 21, 2023, the PCDD issued a non-project Determination of Non-Significance on the proposed IMP. Please note that project specific review under SEPA is required for projects such as the West Pavilion and rooftop heli-pad.

II. CONCLUSIONS

Based on the staff report and materials provided to the Planning Commission for the July 6, 2023 public hearing, the testimony taken at that hearing, the additional public comments provided up to July 20, 2023, and the materials provided to the Planning Commission for the August 3, 2023 work-session, the Planning Commission concludes:

1. The proposed amendments to the PeaceHealth St. Joseph Medical Center Institutional Master Plan, as conditioned herein, are consistent with the applicable goals and policies in the City's Comprehensive Plan and the Cornwall Park Neighborhood Plan.
2. The proposed amendments to the PeaceHealth St. Joseph Medical Center Institutional Master Plan, as conditioned herein, are consistent with the institutional master plan purpose and intent in BMC 20.40.020(A) and (B) 1-5.
3. That through individual project specific review by staff, public comment, and additional environmental analysis, as required, potential impacts associated with implementation of the proposed IMP can be adequately mitigated.
4. That, as conditioned herein, all materials submitted by PeaceHealth, including the information provided in the exhibits provide appropriate rationale for the buildout, as proposed in the IMP, and are consistent with the provisions and standards in the Institutional Development Chapter, BMC 20.40.050.

III. RECOMMENDATION

Based on the foregoing findings of fact and conclusions, the Bellingham Planning Commission recommends that the City Council approve the proposed update of the Peace Health St. Joseph Medical Center Institutional Master Plan, with the following recommendations:

1. The following standards should be added to Sections III C 1 and 2 regarding pedestrian and bicycle amenities instead of the language referencing as follows:

Peace Health and the City shall continue good faith discussions of Peace Health's proposal to construct an alternative bike and pedestrian route or routes through the hospital campus in lieu of constructing the $\frac{3}{4}$ street improvements to Squalicum Parkway. A similar alternative bike and pedestrian route may be constructed along the east side of Squalicum Parkway from the hospital's northerly driveway access point to the southwest corner of the Open Space tract (zone three). The alternative may be approved by the City

administratively, provided it achieves the same or similar level of bike and pedestrian connectivity, functionality and safety, and is located within a dedicated public access easement. Peace Health shall construct the approved alternative, if any, prior to completion of the West Pavilion during the First Phase of hospital development.

2. The existing language in the proposed IMP regarding pedestrian amenities in Section III (C)(1) should be amended to add the following:

A. Extend curb, gutter, and sidewalk along the west side of Squalicum Parkway to provide a continuous sidewalk between Ellis Street and the Park trailhead at Coolidge Drive. Said improvements shall be completed prior to completion of any permitted project under the First Phase of hospital development.

B. Install an enhanced crossing to, and pedestrian landing at, the Daycare on the west side of Squalicum Parkway across from the northern entrance to the hospital and extend sidewalk within the hospital campus to connect with the new crossing. Such improvements shall be completed prior to completion of any permitted project specified under the First Phase of hospital development.

3. The following standards should be added to Section IV H (Street Standards):

Install $\frac{3}{4}$ street improvements (bike lane, curb, gutter, and sidewalk) along the east side of Squalicum Parkway from the hospital's south entrance to the southwest corner of the Open Space tract (Zone Three). Said improvements shall be completed prior to completion of the West Pavilion during the First Phase of hospital development.

Peace Health and the City shall continue good faith discussions of Peace Health's proposal to construct an alternative bike and pedestrian route or routes through the hospital campus in lieu of constructing the $\frac{3}{4}$ street improvements to Squalicum Parkway. A similar alternative bike and pedestrian route may be constructed along the east side of Squalicum Parkway from the hospital's northerly driveway access point to the southwest corner of the Open Space tract (zone three). The alternative may be approved by the City administratively, provided it achieves the same or similar level of bike and pedestrian connectivity, functionality and safety, and is located within a dedicated public access easement. Peace Health shall construct the approved alternative, if any, prior to completion of the West Pavilion during the First Phase of hospital development.

4. Section III (F) – underneath "Phase I" should also reference Section IV (H) for street improvements, and Section III (C) 1, but not Sections III (B).

5. The requirement for Peace Health's 1.8% pro-rata contribution to Phase I of the Birchwood / Meridian / Squalicum Parkway round-about should be included in the IMP adopting ordinance. The specified 1.8% pro-rata share shall be paid prior to issuance of the initial land use and/or building permit approval for any of the projects identified in Phase I.

6. Planned Development Contract #PDC 90-21 shall be repealed and replaced with a new institutional site plan approval for the West Pavilion, rooftop helipad and existing ground helipad. The repeal of PDC 90-21 should occur within the IMP adopting ordinance, with conditions as may be necessary. The adopting ordinance should specify that a new institutional site plan

approval process shall also include additional environmental review under SEPA which would require a project specific SEPA determination.

7. Section IV M of the proposed IMP should include language that Inadvertent Discovery Plans shall be prepared and kept on individual project sites for all future projects that include ground disturbance.

8. The proposed IMP should include language and provisions for vehicle and bicycle electric charging stations and planned accommodations for bicycle storage.

9. Specific emergency flight provider operator's names should be removed from the plan and replaced with a more generic description. PeaceHealth requests the term "air medical transport provider."

10. In Section III(D), the following sentence shall be added to the first paragraph:

"The City may apply appropriate mitigation measures after the environmental analysis takes place."

11. In Appendix C, the paragraph underneath "HELIPAD OPERATING GUIDELINES" should be deleted. The title of Appendix C should remain.

12. In Appendix C, under the "NEW GUIDELINES" section, add a subsection (D) which should read as follows:

D. Follow and adhere to all additional mitigation measures as may be appropriately established by the City during the specific environmental review process for the West Pavilion and rooftop heli-pad.

13. Peace Health should include policy language in the IMP regarding growing food for consumption in open areas on their campus and in coordination with organizations that can provide assistance and/or resources to implement those opportunities.

14. Direct staff to prepare an adopting ordinance, an updated legislative version of the draft IMP, and a clean version of the draft IMP for review by City Council at a closed record hearing, yet to be scheduled.

ADOPTED this 3rd day of August, 2023.

Mike Lott
Planning Commission Chairperson

ATTEST: Debbie Ren
Recording Secretary

APPROVED AS TO FORM:

Jim Hu
City Attorney