



January 12, 2023

Dr. Umair A. Shah, MD, MPH
Secretary of Health, Washington
Washington State Department of Health
PO Box 47890
Olympia, WA 98504-7890

RE: Lynnwood Comprehensive Treatment Center OTP Application Process

Dear Dr. Shah:

I wish to share with you my serious concerns related to processing Opioid Treatment Program (OTP) licensing and the related requirements as outlined in RCW 71.24.590 and WAC 246-341. My specific concerns relate to a proposed Lynnwood Comprehensive Treatment Center located at 2322 196th Street SW, Lynnwood WA 98036.

December 13, 2022 was the first that I, Mayor of the City of Lynnwood, had become aware of the proposed opioid clinic in the City of Lynnwood. I learned of this from a local online news story which was posted following a request directly from DOH asking for a paid notice in their paper. As you can imagine, I was quite taken aback considering the first I'm learning of this new clinic and the licensure processing, was through a local news site, and not directly from the proposed clinic or the Department of Health.

After much research, I have come to learn that an email was sent by DOH employee Michelle Weatherly, to the Lynnwood City Council Members, the day before their scheduled holiday recess, as well as to the Snohomish County Council, requesting their input and notifying them of the scheduled public hearing. The OTP licensure process only requires the applicant to contact the 'city legislative authority and/or county legislative authority', which I believe is an inherently flawed process. Noticing should include the City and County Administration as well as the legislative bodies.

Attached to the email sent to the Lynnwood City Council and the Snohomish County Council from the Department of Health on December 12, was an Opioid Treatment Program Community Relations Plan, only minimally filled out by the applicant – WCHS, INC. (revealed later to be dba Acadia Healthcare). This Community Relations Plan is intended to detail how the facility will conduct outreach and engage with local elected officials and other community stakeholders. The document filled out by WCHS, INC. was terribly incomplete and in fact overstated the level of engagement conducted. There are entire sections left blank, including the required section of holding a meeting with the local county and/or city legislative authority. The fact that the DOH accepted this as a complete Community Relations Plan looks



as though DOH is just checking a box and not truly committed to fulfilling the intent of the requirement.

Additionally, the notice of the public hearing issued from DOH went to the public on December 12, and the hearing was scheduled for an early afternoon on December 29, a date and time when many people in our community are distracted by the holiday season.

As you can imagine, with the complete disregard for community engagement and neighborhood notification, we have experienced a large number of community members who were completely caught off-guard and are angry. There are many legitimate concerns and questions coming from our community with very little answers given. Most of the neighbors are concerned that the facility is located across the street from an active Boys & Girls Club and a little league baseball field.

I truly understand that our State and our County are experiencing an opioid epidemic and our communities need treatment options. The process and manner by which this facility is working to obtain an opioid license from the DOH lacks transparency and accountability. We sincerely hope that WCHS, INC. (dba Acadia Healthcare), takes the feedback they have heard from the City of Lynnwood and the neighboring community members, and develops a robust community engagement plan to include a community safety plan. If the Department of Health is intending to move forward with this licensure, there must be accountability on the part of the facility to be a good neighbor and community partner.

I am more than happy to discuss my concerns with the OTP licensing process and the RCW that outlines the process. There needs to be a more transparent approach that upholds accountability on the part of the facility, so that our community members in need, can truly find the therapeutic rehabilitation they deserve.

I ask that no approval be granted from the Department of Health until steps are properly taken by WCHS, INC. to fulfill the Community Relations Plan, meet with stakeholders and address any identified concerns as noted in the DOH's certifications steps for proposed programs, and collaborate with our Lynnwood Police Department on a community safety plan.

Sincerely,

Christine Frizzell

Christine Frizzell, Mayor

CC: Michelle Weatherly, Department of Health
Lynnwood City Council
Snohomish County Council
Snohomish County Executive Dave Somers
State Representative Lauren Davis, District 32

