



**DISCOVERY PARK
COMMUNITY ALLIANCE**

June 26, 2017

Ms. Lindsay Masters
Office of Housing
City of Seattle
P.O. Box 94725
Seattle, WA 98124-4725

RE: Fort Lawton Army Reserve Center Redevelopment EIS Scoping Comments

Dear Ms. Masters,

The Discovery Park Community Alliance is a growing association of now over 105 individuals from the Magnolia neighborhood and from the city of Seattle at large who are dedicated to ensuring that the Fort Lawton Army Reserve Center (FLARC) property is annexed to Discovery Park. Conversely, they are opposed to establishing any type of housing uses at the site.

INTRODUCTION

The long history of Seattle, Fort Lawton, and Discovery Park and the people associated with them is that their fates have always been inextricably linked, and that the land thereof has been in constant service to the people who used it and lived around it. There never has been a time when the one didn't lead to the other and then back again.

Beginning with time immemorial, the Duwamish Tribe utilized the West Point, the uplands, and surrounding waters to process their food. Their successors became the early settlers who used the same land the Duwamish had eventually abandoned to establish their homesteads upon it. Later, those settlers released the land in order to establish an important military outpost for Seattle's economic growth and for its protection. Over time the military uses of the land increased to include the region's and finally the nation's protection.

As was appropriate however when the military's need for the land ended the majority of it was returned to Native American and citizen occupations and uses. Notably and historically both groups rejected high impact uses for the land after it had returned to them. Both have demonstrated through their now decades of stewardship and use of the land their commitment first and foremost to nature, peace, and a universal understanding of the natural and cosmic world in which we live.

The People's Lodge and property, Discovery Park, they are testament to the values and vision of the land's heirs, a demonstration of what they ultimately value, and that is to hold onto the ideals of their ancestors, to acknowledge and steward the land so that it is a source of happiness and contentment with nature and the environment in which it exists, and to guard against any intruder(s) or intrusion(s) that might seek to or otherwise destroy the harmony of the land with its guests and protectors.

The rightful heirs to the land, the Native and non-Native community have done all of these things in concert with each other, through their stewardship of the land, by establishing uses that are not high impact, that are not about commercial and other forms of economic gain, that are primarily about first the souls, spirits, and communal lives of those living and working around the land.

As the fate of this final piece of property of the great Discovery Park peninsula is debated it is important to put the debate into context. This matter is not about casting lots to see who can be the economic or political winner. It is instead about embracing our past and facing our future and deciding which we value more. Is it establishing and leaving a legacy that satisfies the natural and cosmic needs of humans, honors the natural world, or will we demonstrate that we have no such sense of existential rectitude and instead take the cheap (in many ways) and pecuniary route as has become so common in our society – going for the big bucks and the political payoff for a few?

The members of the Discovery Park Community Alliance and its supporters sincerely believe that the outcome will be that it is the former that we value more - nature, peace, and universal understandings.

OBJECTION TO COMMENT PERIOD LIMITATION

Despite numerous and impassioned requests by the public to the City of Seattle that it extend the comment period for the scoping portion of the environmental impact statement the City has refused to extend it. According to the Washington State Department of Ecology's SEPA Environmental Review Handbook - the extension of comment periods under SEPA¹ are always "encouraged particularly for important or controversial proposals – regardless of environmental significance".² Likewise the same holds true for any NEPA³ review which may also be required for this proposed undertaking. This project is not of such an urgent nature that another 10, 20, or more days for public comments on the scoping would have caused any appreciable delay in the environmental review process.

RECONFIGURATION OR ADDITION OF ALTERNATIVES

The City's proposed alternative #3 comes the closest to the alternative that the DPCA could support – development of the entire FLARC site as a public park. The objectionable portion of this alternative is that as proposed now it is solidly linked with the construction of homeless and affordable housing at an off-site location. To that end the City recently proposed just such a location, a trial balloon as it were, at the Talaris Conference Center in Seattle's Laurelhurst neighborhood.

However, in the end this is a legally flawed alternative because the subject environmental review is for a particular piece of land, the FLARC property, and there is no way to do a legitimate or credible environmental review of Alternative 3 without the City of Seattle owning, controlling, or identifying the “off-site location” on which to construct the homeless and affordable housing component that it is proposing. An environmental impact statement cannot be based upon a proposal to undertake specific project alternatives but at an unknown location. This same argument holds true for Alternative 2, which also is based upon the construction of homeless and affordable housing at an off-site location.

Therefore, it is requested that the City de-link the housing component of Alternative 3 or otherwise establish an alternative that is strictly about the development of the entire FLARC site as a public park, *with no linkage to constructing homeless and affordable housing at an off-site location*. The same de-linking is requested for Alternative 2 also.

Please note, Alternative 1 proposes that an existing structure and adjacent grounds be converted to a park maintenance facility. Alternative 3 makes no mention of that project component. A parks maintenance facility is a use that is consistent/compatible with a “public park”, and particularly in the present instance and configuration of the FLARC property, its use as a future park. The suggestion is made that in addition to de-linking the housing component from Alternative 3 that the park maintenance facility be added to Alternative 3 (and likewise to Alternative 2).

COMPETITIVE BIDDING FOR PROJECT PARTNERS

The City’s entire EIS is predicated on contracting with both Catholic Community Services (CCS) and Habitat for Humanity (HH) as service providers and housing construction and management partners. This has been brought to the City’s attention that this is an unacceptable arrangement, by fiat declaring that these two organizations are the project partners. The previous iteration of the FLARC property development process included CCS and HH as partners however, one this is a different project than before, and more importantly CCS and HH were selected as partners after a competitive process.

Given that the present FLARC reuse proposed plan is a distinctly different project in configuration, programming, and overall scope, it is not a sustainable proposition that the City defaults to its friendly service providers of the past, foregoes a rigorous provider selection process, and installs CCS and HH as the project partners.

Furthermore, given the homeless housing and help, and even the affordable housing component likely will have inhabitants and even clients that intersect with the City’s Pathways Home plan, its homeless navigation services, both of which are operating on the basis that the contracting for them is on the basis of competitiveness and accountability. As per Mayor Murray and the City of Seattle’s department of homelessness, “Pathways Home helps us create a coherent, integrated, coordinated system out of the more than 180 contracts spread out among 60 different service providers. It establishes a “by name” list of those seeking housing

that is shared among all providers, so the entire system can begin to better know and understand what each individual's situation entails, which will allow providers to begin to unclog the system at the shelter level and redirect investments towards housing. It sets clear and consistent performance expectations, and institutes accountability measures to ensure that the City is paying for the best outcomes possible. This includes competitively bidding our provider contracts — something that has not happened in over a decade.”

The emphasis here being on “competitiveness”, “performance expectations”, “accountability measures”, and a now “60 different service providers”, accordingly there is no rational basis, expedient basis, or legitimate basis upon which the City is retaining its old retainers Catholic Community Services and Habitat for Humanity. It is a new day in City of Seattle governmental practices. No longer are the relationships of convenience and familiarity the basis upon which to make decisions that cost the taxpayers tens of millions of dollar. Backroom deals, old home week with consultant pals and providers, wink and a nod bargains — like what is going on with this project — is unacceptable and in a word — corrupt.

Therefore, the DPCA community requests that the City reconsider this flaw in its planning and open up the partner contract/contractor portion of the project to competitive bidding, issue an RFP or other solicitation to the now many providers who are players and entrants in the homeless-ness and affordable housing fields. While this may vitiate the current environmental review proceedings, the City should have foreseen that its mis-reliance upon old relationships, dated assumptions, and refusal to follow new contracting norms for the City of Seattle would become problematic for the smooth processing of this project.

MISRELIANCE UPON U.S. ARMY'S 2012 AND OTHER PREVIOUS NEPA ENVIRONMENTAL ASSESSMENTS

When no project action is taken and an environmental review document (EIS or EA) sits fallow for many years after its completion it is necessary to re-examine the previous information, assumptions, and findings of the past and determine whether the original EIS/EA document(s) remain valid, whether additional documentation is needed to keep the document valid, or whether a supplemental version of the EIS/EA is required. In environmental processes and practice this is called re-validation.

The City has made numerous references in public, in its project documentation, and in its consultant contracts to its reliance upon and incorporation of the 2012 U.S. Army Corps of Engineers Environmental Assessment (EA) into the current environmental impact statement/process; as well as even earlier environmental documents. While dated five years ago, given that environmental reviews are notorious for the lead time it takes before they are completed and adopted, it is more likely that the EA is more like six or seven years old — certainly a long enough time in the fast changing world and economic and social times for the information and assessment to have become “stale dated”.

When coupled with the other project elements and influences that have likewise changed in the interim — a new president, a new head of the Department of Defense, new

military directions and influences, a different economic environment, changing priorities for government spending and administration – it is very likely that the environmental documents which the City is placing heavy reliance upon need to be re-validated.

Therefore, the DPCA is requesting that all environmental review documents that the City is incorporating into the present environmental review process, either outright adopting the assumptions or conclusions therein, referencing, or otherwise utilizing them be subjected to a rigorous re-validation process, that involves that public, and that the outcome of such be made public.

COMMUNITY WELLBEING – CRIME, SOCIAL AND ECONOMIC HEALTH

Generally speaking it is a common concern of residents in established and stable neighborhoods that a city government's social policies call for the redistribution of populations, placing socially and economically troubled populations in neighborhoods that have nominal numbers of residents with such traits. It is of note; academic studies have shown that the residents that have been designated to become the hosts and neighbors of a beleaguered set of peoples are not entirely without a basis to be concerned.

A couple of representative passage from such literature/studies:

“Although the overall effect on crime in both cities was generally positive, as with any *major social policy intervention*, CHA and AHA efforts generated positive effects in some places and negative effects in others. (Emphasis added). Both cities experienced significant and lasting crime declines in neighborhoods where they tore down public housing and in many neighborhoods where former public housing residents moved [into]. In a relatively few areas in Chicago and Atlanta *that received more than a few relocated households*, however, crime decreased less than it would have if no former public housing residents had moved in, or had there been no social policy intervention.”⁴ (Emphasis added).

“This analysis shows a similar pattern in both Chicago and Atlanta: not the simplistic relationship implied by media accounts, but rather a complex picture of declining crime rates in both cities, a small net decrease in violent crime citywide associated with the transformation efforts, and effects in some neighborhoods—those that received more than a few relocated households—that suggest that crime would have been less there had no public housing transformation occurred...Ethnographic research might help shed light on how relocated households affect neighborhood dynamics. Regardless of the mechanism, a crucial policy implication from this research is the need for responsible relocation strategies...Other housing authorities planning large-scale redevelopment should learn from the experiences of these two cities about how to support former residents in moving to a wider range of communities and how not to create new concentrations of poverty in other vulnerable communities.”⁵

In other words – the placement of populations who have experience or association with poverty, social problems, and crime in one neighborhood, and put them in a neighborhood relatively free from such negative influences, there are mixed outcomes. The transplanted

population may see a decrease in the negative effects which have previously beset them, however the neighborhood who is now host of those populations will not see for example the decline in crime in their neighborhood had the transplants never moved in.

This is just one aspect of the “Case for Responsible Relocation” – that is what the City has a duty to ensure if its housing Alternative 1 were to be undertaken.

Therefore, this is but one leg of the review which the City must study and incorporate into the EIS for the FLARC property, the impact on crime, the increase or decrease thereof, in the designated neighborhood/community that the City is proposing to place its designated social and economic refugee populations in; and likewise study any impacts to the community’s, neighborhood’s, or personal safety as a consequence of the project – including but not limited to possible rates of crimes (distinguish between types).

Likewise, DPCA is requesting that the City study any and all programming, actions, services, interventions, or screening that the City and any to-be-selected service and housing providers will set in place to ensure positive social, economic, and safety outcomes for the relocated populations as well as for the existing community and neighborhood.

TRANSPORTATION – NOT THE EXPECTED OUTCOME

Previously when a version of this project was proposed and in the current project’s environmental review many public comments and inquiries have been made about the lack of fundamental public transportation to and from the FLARC site. This particular conversation relies upon the assumption that low income people, the majority that would inhabit the special enclave that the City proposes to create for them, would wholly or solely reliant upon public transportation to get around, locally and around the city.

However, a review of the literature on the transformation of relocated populations into remote locales, in comparison to where they formerly resided, indicates that they are resilient in adapting to such inconveniences, aided by their new and ultimately, hopefully, social and economic stability, they acquire cars:

“There’s more than one way to solve families’ transportation needs. When low-income families move from central cities to suburban neighborhoods [something that would be akin if they were to be located at the FLARC property], they sometimes feel trapped in their homes because public transit options are so limited. This was an early complaint among the families Massey interviewed. But most have since gotten cars, and analysis underway by my colleague Rolf Pendall suggests that access to a car increases families’ chances of economic advancement, other things being equal. So policymakers should focus on connectivity rather than public transit and explore ways to provide affordable car access in addition to ownership.”⁶

Therefore, given that the past and present assumptions and conclusions by the City is that poor people, socially and economically oppressed people take public transit, certain situations may negate those presumptions, thus DPCA is requesting that the City study the

transportation consumption needs and patterns of the project not so much on the basis of the public transportation angle, but from the standpoint that future populations on the FLARC property may rely on in no small part on private vehicle ownership or access for their transportation needs.

Likewise, it is notable that all Alternatives, planning elements of the FLARC project are not compatible with, actually even a part of the City's Citywide Plans for priority corridors for Transit Investments, Planned Frequent Transit Service Network, Pedestrian Priority Investment Areas, and only in a miniscule way likely to be considered in the Bicycle Network in the Bicycle Master Plan. Therefore, DPCA requests that the City thoroughly study those transit, pedestrian, bicycle elements and how any of the City's plans for the FLARC property will be in conformity with existing Comp and transportation/mobility related master plans *and* policies.

PROJECT'S LACK OF CONFORMITY WITH
SEATTLE'S COMPREHENSIVE PLAN AND HOUSING AND LIVABILITY AGENDA

Just as it was noted above that there is a new era and regime at City Hall related to contracting and contract performance, there are likewise new policies and rules for governance and edicts for housing practices and placement.

The current Comprehensive Plan (Comp Plan) details where growth is to take place in the city of Seattle through its "Growth Strategy", its "Urban Village Strategy". The adopted Comp Plan establishes that future density/growth in Seattle "...should occur in the urban centers, urban villages", and to underscore that sentiment, policy, the Mayor recently stated that changes to single family zones outside of urban villages and proposed expansion areas would not be pursued.

Certainly, the housing proposals for the FLARC property, particularly those related to housing the homeless and affordable housing fly in the face of the Comprehensive Plan and the upcoming Housing and Livability Agenda (HALA), as well as the Mandatory Housing Affordability (MHA) policy.

Therefore, the DPCA requests that the City substantively study the conformity of the FLARC housing proposals to the City's Comprehensive Plan, to HALA, and to the MHA; including but not limited to such elements as all of the Comp Plan's Growth Strategy Goals, and all of its the Land Use Goals.

Thank you in advance for your time and consideration of these comments.

Sincerely,

DISCOVERY PARK COMMUNITY ALLIANCE

/s/

Elizabeth A. Campbell, MPA
Co-Chair

¹ State Environmental Review Act RCW 43-21
http://www.ecy.wa.gov/programs/sea/sepa/43_21C.htm#z060

² <http://www.ecy.wa.gov/programs/sea/sepa/handbk/hbch02.html#2.8.2>

³ National Environmental Protection Act
<https://www.epa.gov/nepa>

⁴ https://www.huduser.gov/periodicals/cityscape/vol14num3/Cityscape_Nov2012_pub_house_trans.pdf

⁵ <http://www.urban.org/sites/default/files/publication/25181/412523-Public-Housing-Transformation-and-Crime-Making-the-Case-for-Responsible-Relocation.PDF>

⁶ <http://www.urban.org/urban-wire/affordable-housing-safe-neighborhoods-four-lessons-success>