

**Two sample DEIS comment letters by Magnolia community members that set out observations of and responses to the general overall conceptualization that the City has put together for the Fort Lawton Army Reserve property DEIS. They make response to the DEIS in general and to specific aspects of it. They provide examples of the types of things that can be commented upon and approaches – both practical and legal – that a community member may take with their comments on the DEIS:**

#### **DEIS COMMENT LETTER #1**

I am a lifelong Magnolia resident and neighbor of the Fort Lawton property. I reviewed the Draft EIS for the Fort Lawton Redevelopment and have several comments:

##### **Other Reasonable Alternatives**

The Talaris alternative is not reasonable or legitimate. The Talaris site is an unreasonable alternative as the cost of the property is prohibitive. Legitimate alternatives would include sites that are feasible and attainable. Although the Talaris site is a similar size and would accommodate a similar redevelopment, the stated goals could be met on smaller parcels located throughout Magnolia, the vicinity, or the city. Existing structures should be considered as practical and feasible alternatives rather than proposing new construction only.

##### **Discovery Park Master Plan**

The DEIS dismisses the Discovery Park Master Plan. Page 3.6-47 states: *the 1986 Master Plan created no enforceable right or duty*. It is unreasonable to not consider the Discovery Park Master Plan as the park is located immediately adjacent to Fort Lawton. The Master Plan is integral to the existence and operation of the park and contains specific guidance regarding development within and around the park. The DEIS fails to disclose that the Fort Lawton redevelopment proposals are inconsistent with provisions of the Discovery Park Master Plan. Many scoping comments requested that the Discovery Park Master Plan be considered as any development of Fort Lawton would have a direct significant impact to Discovery Park.

In contrast to the Discovery Park Master Plan, the City of Seattle 2035 Comprehensive Plan is quoted repeatedly throughout the DEIS. The 2035 Comprehensive Plan also has *no enforceable right or duty*. A comprehensive plan is not usually legally binding. A community's ordinances must be amended in order to legally implement the provisions required to execute the comprehensive plan. The DEIS should not contain references to only selective plans for guidance. It is unreasonable to apply the *enforceable right or duty* standard solely to the Discovery Park Master plan and not to the 2035 Comprehensive Plan. The DEIS is incomplete unless all relevant plans and policies that pertain to Fort Lawton are considered.

##### **Cumulative Effects**

Various conclusions included in Alternative 1 ignore the cumulative impacts that result from the incremental impact of the proposal when added to other past, present, and reasonably foreseeable future actions and population increases. Page 3.10-4 states *there is little growth from new development expected in the immediate vicinity*. Currently, legislation is proceeding which will significantly increase population density in the vicinity as well as the City as a whole. The effects of the implementation of Mandatory Housing Affordability zoning changes and changes to Accessory Dwelling Unit regulations have not been adequately addressed in the Draft EIS. Specifically, future development of the Interbay corridor and Expedia headquarters will also significantly impact transportation and public services. The analysis in the DEIS underestimates the effects of the action alternatives on the community and should identify and mitigate obvious growth and density changes foreseeable in the near future.

##### **Transportation**

The DEIS study area includes only intersections in the immediate vicinity of Fort Lawton (page 3.10-10). The DEIS does not adequately consider and analyze significant traffic and transportation impacts to the community of additional traffic that will result from the Fort Lawton proposals. Magnolia is served solely by three access points which are where congestion occurs. The DEIS Magnolia study area should include the impact of the redevelopment to the access points in addition to the neighborhood streets surrounding Fort Lawton. Furthermore, the DEIS should address the impacts of the redevelopment on the aging Magnolia bridges. The DEIS study should include impacts in the event that one or more of the bridges fails or is out of service.

##### **Magnolia Housing History**

The DEIS oversimplifies and misrepresents Magnolia's housing history. The DEIS asserts on Page 3.14-9 that *Magnolia is among the neighborhoods that used restrictive covenants in the past and has remained a relatively exclusive neighborhood with little to no access to affordable housing choices for those with low-incomes.* Although certain plats may have had such restrictive covenants in the past, most plats in Magnolia had no such covenants according to *Seattle Civil Rights and Labor History Project, Racial Restrictive Covenants* as cited on page 3.13-16. Many areas in Magnolia were affordable to all income levels and the plats in the immediate vicinity of Fort Lawton had no racial restrictive covenants. The Draft EIS ignores the fact that Magnolia was home to three large significant military installations for many years up until the late 1960s. Besides Fort Lawton, the Pier 91 Naval Station, United States Coast Guard Base, fishing, maritime, railroad, and lumber industries housed many diverse and low income populations in Magnolia. A more complete study of Magnolia housing history should be included or the selective historical data mentioned should be deleted as it is incomplete and misleading.

The DEIS is incorrect in its assertion that Magnolia has little to no access to affordable housing choices. As an example, the Seattle Housing Authority currently operates two affordable housing sites within walking distance of Fort Lawton: Fort Lawton Place with 24 affordable apartments as well as the Pleasant Valley Plaza Apartments with 41 affordable apartments.

### **Magnolia Housing Cost**

The DEIS is contradictory when it states on page 3.13-15 that *The Magnolia neighborhood is generally a high cost neighborhood...* The support given indicates that average rent of \$1,710 in the Fort Lawton vicinity is actually lower than the average citywide. In addition, the median list price per square foot given for Magnolia is only 2 1/2% higher than the city of Seattle average. Given the facts provided in the DEIS, Magnolia in fact appears to be an average cost neighborhood in Seattle and not the high cost neighborhood described. A more accurate depiction is needed.

### **Conclusion**

From reading the DEIS in its entirety, it appears that it was determined that the proposals will have no significant impacts and no mitigation is necessary. The addition of approximately 600 residents to Fort Lawton in a high density development with the provision of services for 85 units will indeed have a significant impact in an area that is now zoned single family. The DEIS fails to consider practical and feasible alternatives and underestimates the effects of the preferred alternative to the surrounding area.

## **DEIS COMMENT LETTER #2**

1. I am a resident of Magnolia and I have some comments about the Draft EIS for the Fort Lawton Redevelopment:

### **Supportive Housing**

The DEIS states on Page 2-17 that an objective of the proposal is to provide *Approximately 85 units of permanent supportive housing for homeless seniors, including veterans.* When questioned at an EIS scoping meeting, Steve Walker of the Office of Housing stated that the supportive permanent housing would not be limited to seniors or veterans. He stated that the housing would only "target" seniors as well as veterans of any age.

The DEIS fails to accurately describe the supportive housing. The EIS should clearly identify the population served by the supportive housing.

### **Flawed Alternatives**

The DEIS lists four alternatives. Alternative #2 and Alternative #3 describe on Fact Sheet ii the *construction of homeless and affordable housing at the Talaris site.* Page 1-1 states that *This site is included only as an example of a possible off-site alternative for the affordable and formerly homeless housing.* The DEIS also states that the Talaris site *is provided in order to conceptually analyze probable adverse impacts...* and that *Additional more detailed SEPA review of the Talaris site, or another off-site location, would be required should that or another site ultimately be selected for the affordable and formerly homeless housing.*

WAC 197-11-786 states that *"Reasonable alternative" means an action that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental*

*degradation.* The State Environmental Policy Act Handbook states *For public projects, alternative project sites should also be evaluated.* An example that is only conceptual does not meet the definition of an alternative project site and is not a reasonable alternative as the Talaris site cannot ultimately feasibly be selected. The City has shown no intent to build affordable housing at Talaris. The City does not own Talaris and has not made an attempt to purchase it. In fact, the Seattle Times reported on January 19, 2018 that there is an agreement for Quadrant Homes to purchase the site for market rate homes. Alternatives #2 and #3 are not bonafide, feasible, or reasonable. The City has misled the public with the Talaris alternatives and has spent substantial taxpayer funds on a site that they never had any intention of considering.

In addition, Alternatives 2 and 3 are not reasonable alternatives as the City did not engage with the Laurelhurst community. The City did not send out scoping notices, solicit comments, or hold meetings near the Talaris site as they did with the Magnolia community. Without outreach to the neighboring community, there can be no constructive, realistic analysis of the site and renders the evaluation invalid.

The DEIS fails to analyze reasonable alternatives as required under WAC 197-11-786 and also fails to evaluate an alternative project site as described in the SEPA handbook. The EIS should identify reasonable alternatives that meet the stated objectives of the project. The DEIS is incomplete without discussion and disclosure of both the rationale and citations for the use of an unfeasible, conceptual example rather than actual feasible alternatives that could be selected.

### **Discovery Park**

The Friends of Discovery Park has issued a position paper below which I support:

*The following statement is a consensus opinion by the Board of Trustees of the Friends of Discovery Park regarding the nearby Fort Lawton Army Reserve Center (FLARC) parcel, currently undergoing review by the City of Seattle's Department of Housing.*

*We believe that the Army Reserve parcel in its entirety, should be incorporated into Discovery Park. To accomplish this, we urge that all man-made structures at the site be removed and the site be completely reforested with native trees and understory.*

*The 30 acre Army Reserve property is now heavily urbanized, with many acres of paved surfaces, buildings, and overlapping fences. As such, it is distinctly unfriendly to the wildlife that live and reproduce in the nearby forests of Discovery Park and Kiwanis Ravine. The property is uniquely situated between the Kiwanis Ravine and the larger green spaces of Discovery Park.*

*Growing a forest across this site would create a much needed wildlife corridor between the ship canal, the Ravine and Discovery Park. We recognize that there are a variety of competing interests for the use of this property. Suggestions include low income housing, a school and other uses like playgrounds, baseball fields and tennis courts. If one or some combination of these uses become implemented, we ask that any man-built environment on the site be appropriately and sensitively incorporated into a forested canopy, using a mosaic of legally protected indigenous plant communities distributed across the entire property.*

***In conclusion, we believe the best use of the Fort Lawton Army Reserve property would be full incorporation into Discovery Park and management of it according to the Discovery Park Master Plan.***