



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

September 21, 2022

Mayor Bruce Harrel
City of Seattle
600 4th Ave, Floor 7
Seattle, WA 98104

Re: Application Status and Legally Binding Agreement for Fort Lawton Army Reserve Center

Dear Mayor Harrel:

The Department of Housing and Urban Development (“HUD”) is in receipt of your letter, dated August 5, 2022, on behalf of the City of Seattle, acting as the Local Redevelopment Authority (“City” or “LRA”). The letter requests that HUD allow additional time for the City to explore the feasibility of infrastructure costs related to the redevelopment of the former Fort Lawton Army Reserve Center (“Fort Lawton”) in Seattle, Washington.

As noted in HUD’s June 7, 2022 letter, HUD intends to take a formal action on the Application for Fort Lawton, which includes the Legally Binding Agreement (“LBA”), dated September 27, 2021. While the supplemental information in the City’s letter includes more detail on the pre-development timeline on the homeless housing and updates the schedule for work during infrastructure implementation, HUD still cannot determine that the Application is complete. Specifically, HUD cannot verify that the LBA meets 24 CFR 586.35(b)(iv) until the City provides additional information on the costs and financing for the design and infrastructure implementation. In its letter, the City states it will have this information by June 30, 2023.

In considering the City’s request for additional time, HUD recognizes that the City has updated the schedule in the LBA to advance the estimated placed in service date for the homeless housing. Although the City needs more time to complete its budgeting process, the updated schedule sets forth planned steps to identify a viable funding plan within a specified time frame. Additionally, in December 2021, the City executed a real property lease renewal with the United States Army for the City of Seattle’s continued interim use and occupancy of Fort Lawton. It is a one-year lease with four one-year extensions.¹ Under the lease, the City is responsible for all holding and caretaker costs associated with the property (e.g., annual stormwater assessments, grounds maintenance costs, utility costs, security costs, and property/liability insurance costs), a cost estimated at approximately

¹ [Department of the Army Lease No. DACA67-1-22-0500 under Base Realignment and Closure \(BRAC\) Fort Lawton Army Reserve Complex King County, Washington.](#)

\$700,000 per year.² Entering and continuing to abide by the terms of the lease during the ongoing process to produce a balanced budget shows a commitment by the City to the redevelopment of Fort Lawton as described in its Application.

For these reasons and in accordance with 24 CFR 586.25, HUD grants the additional time requested by the City and will delay its determination, provided the City demonstrates completion or accomplishment of each of the key milestones listed in its August 5, 2022 letter, as modified in the table below.

MILESTONE	DATE OF COMPLETION
City establishes Interdepartmental Team (IDT) on infrastructure	10/1/2022
IDT received refined infrastructure costs by field experts	12/15/2022
All funding sources for implementing infrastructure improvements identified and schedule for submissions of funding requests completed	2/1/2023
Funding requests submitted	2/1/2023 to 4/1/2023
City secures WA State funding allocation	6/30/2023

HUD also requests that the City share the refined infrastructure costs when available and clearly identify those costs required for the homeless housing. HUD also acknowledges that the City has set April 1, 2023, as the date for making funding requests, however, encourages the City to submit those requests at the earliest date possible following receipt of refined infrastructure costs by field experts.

HUD's decision is consistent with the information set forth in the June 7, 2022 letter that the City must identify and meet specific milestones to provide HUD with the assurances needed to verify progress toward making homeless housing available in a "timely fashion." HUD requests regular updates from the City on the status of the milestones noted above. Failure to meet a milestone shall be grounds for terminating the extension and taking immediate formal action on the pending Application for Fort Lawton.

* * * * *

² [Summary and Fiscal Note for CB 120210.](#)

In closing, HUD continues to appreciate all the work the City has undertaken and will continue to make itself available. As noted in previous correspondence, should the City have any questions or need any additional guidance it should reach out directly to Mitchell McBee at Michell.M.McBee@hud.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jemine A. Bryon". The signature is fluid and cursive, with a large initial "J" and a long, sweeping tail.

Jemine A. Bryon
(Acting) General Deputy Assistant Secretary

cc: Maiko Winkler-Chin, Director Seattle Office of Housing
Margaret Salazar, Regional Administrator, HUD
Norman Suchar, Director, Office of Special Needs Assistance Programs
Michell McBee, Specialist, Office of Special Needs Assistance Programs