

November 1, 2020

Ms. Kirsten Kenny
Federal Aviation Administration
2200 S 216th St
Des Moines WA 98198

Dear Ms. Kenny.

I'm writing today to discuss with you the FAA's Air Route Surveillance Radar (ARSR) facility located in Discovery Park.

As you know the Fort Lawton ARSR facility is a vital link in the FAA's mission to monitor our skies and keep our airspace safe. We are grateful for the work that the FAA does there and acknowledge their long history of service to our country.

Although the air safety mission of the site is paramount, we also recognize that the lands of old Fort Lawton are a shared resource, and used by many stakeholders. One such stakeholder are the many thousands of ordinary citizens who use the Park every single day. As a group whose job it is to represent those citizens, we take our role of advocacy for them seriously.

We have carefully studied the Fort Lawton FAA site and its surrounding fence lines and believe that some very simple but effective changes can be made that both upgrade the operational security of the site for the FAA, and improve public access to the scenic viewpoint at the top of the hill. Such changes would come at no cost to the federal government. They would have no functional impact on the FAA's mission.

We ask that you carefully consider our attached proposal. It has been developed only after careful research and lengthy discussion with qualified advisors. We believe it to be a fair, honest and good faith effort at improving the site for everyone involved. We look forward to working with you.

My email is philip.vogelzang@gmail.com. My cell phone is 206-321-6888.

Sincerely,

A handwritten signature in black ink that reads "Philip Vogelzang". The signature is written in a cursive style with a horizontal line underneath the name.

Philip Vogelzang, MD
President Friends of Discovery Park

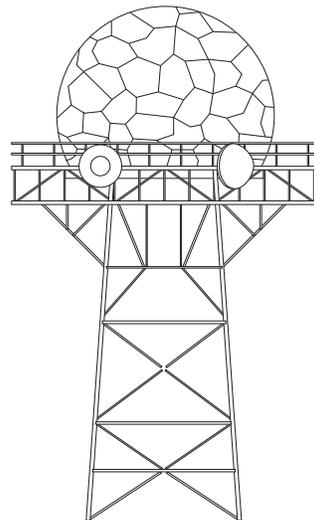
cc:
David Sumoi, Regional Administrator, Northwest Mountain Region

A PROPOSAL FOR IMPROVEMENTS TO THE FAA's
FORT LAWTON LONG RANGE RADAR
FACILITY IN DISCOVERY PARK

by

FRIENDS OF DISCOVERY PARK

November 2020



Introduction:

This document is a proposal by Friends of Discovery Park to make changes to the Fort Lawton FAA facility in Discovery Park with the goal of improving both the operational security of the site and the overall experience of visiting Discovery Park for the public.

Friends of Discovery Park recognizes the primacy of the air safety mission of the Fort Lawton FAA facility in Discovery Park. This mission is paramount for all concerned.

Most FAA aircraft surveillance radars are in remote areas. The Fort Lawton facility in Discovery Park is unique for the FAA. Far from being remote, it occupies an elevated and strategic location at the center of Seattle's largest and most used public park. The Friends of Discovery Park therefore suggest this site deserves special design considerations from the FAA.

In 1974, when Discovery Park was created from the decommissioned Fort Lawton military base, the purpose of the Park was stated: "The overall objective for Discovery Park is to preserve or create open space. The development objective is to re-create a natural environment by removing all unnecessary structures and making the retained structures or any new structures as unobtrusive as possible."

The Friends of Discovery Park believe that minor changes to the fences around the FAA facility would improve overall security for the FAA facility, reduce the obtrusiveness of the current security fencing and improve the ability of the public to safely enjoy the exquisite views of the Puget Sound and Olympic Mountains.

History:

The FAA built its radar tower, known as an Air Route Surveillance Radar (ARSR) in 1958 and has been continuously operating there since. It was part of the original Fort Lawton Air Station which included three other similar sized towers that supported the Nike/Hercules missile system. These non-FAA radars were taken down in 1963.

When Fort Lawton was decommissioned and transferred to the City for use as a Park in 1974, the FAA and NOAA retained federal ownership of two parcels, 0.55 acres and 1.8 acres respectively. In the aftermath of Sept 11, 2001 the FAA petitioned NOAA to transfer its surplus 1.8 acre property to the FAA for security purposes. Ownership was transferred in 2002 and increased the size of the FAA footprint in Discovery Park from 0.55 acres to its current 2.35 acres.

Facility description:

FAA parcel: The ARSR radar dome and its support building(s) occupy a 160 foot square, 0.55 acre site referred to as the "FAA parcel". The tower itself is over 70' high. It is surrounded by a square shaped 640 feet long, 7 foot tall conventional chain link fence, 160 feet per side, topped with barbed wire and is referred to as the "FAA fence". It is relatively new and in good repair.

NOAA parcel: The NOAA parcel is a larger, 1.8 acres, L-shaped property and is situated along the north and the west sides of the square FAA parcel. The “NOAA fence” refers to the 1220 feet of fencing that encompasses the property on the west, the north and northeast sides. This fence is older than the FAA fence and is heavily rusted. The NOAA parcel contains a small Port of Seattle (POS) emergency communications building, just to the northeast of the FAA site. The Port of Seattle leases this facility from the FAA and is responsible for its maintenance. Several inverted antennae on the tower itself function as an emergency radio link from downtown facilities to the Shilshole marina area.

Gate Access: The south gate is the primary access for the FAA parcel and is signed and video monitored. There are two locked access gates on the NOAA fence line - to the east on California Ave and to the north on Washington Ave. The Port of Seattle uses the east gate to access its communication facility. The north gate is rarely used.

Adjacent property owners: The City of Seattle Parks Dept owns property on the east and west sides and is open to public access. Privately owned residential properties are on the north and south sides.

Facility Security:

The Fort Lawton FAA facility in Discovery Park is considered critical infrastructure. It is part of the larger Joint Surveillance System, made up of 30+ Air Route Surveillance Radars (ARSRs) scattered throughout the US.

Security for these facilities is covered by FAA Order 1600.69C effective 8/22/16, which provides security requirements for all FAA facilities (see appendix 1). This Order defines the Facility Security Management Program (FSMP), which establishes security requirements for all FAA critical infrastructure, called Facility Security Levels (FSLs) and are graded on a scale 1-5. The unmanned ARSR radar facility at Discovery Park is rated an FSL-2. The security requirements for FSL-2 facilities are limited. The Order states - “there is no established setback for FSL 2 critical infrastructure facilities.”

We suggest the current security perimeter and setback to the north and west of the FAA facility are more than what are required for FSL-2 infrastructure. We also note that there are no security precautions present along the east aspect of the FAA fence. From California Avenue, 260 feet to the east, a motorized vehicle can drive unimpeded across an open field to within 20 feet of the actual tower base.

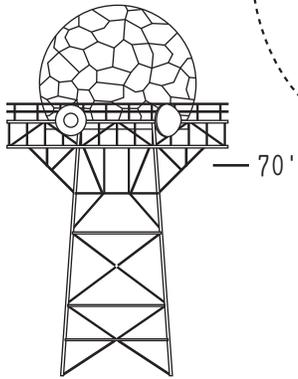
We therefore propose the following changes, with the costs of implementation to be the responsibility of Friends of Discovery Park:

- 1) Construct a new high security fence around the Port of Seattle’s communication building, support generator and propane tank with appropriate signage.
- 2) Demolition of the current NOAA fence (1220 feet) and any pavement or other structures deemed nonessential by the FAA.
- 3) Establishment of a circular Vehicle-exclusion Zone (VEZ) around the west, north and east sides of the radar tower with a radius of approximately 140’ . This is the

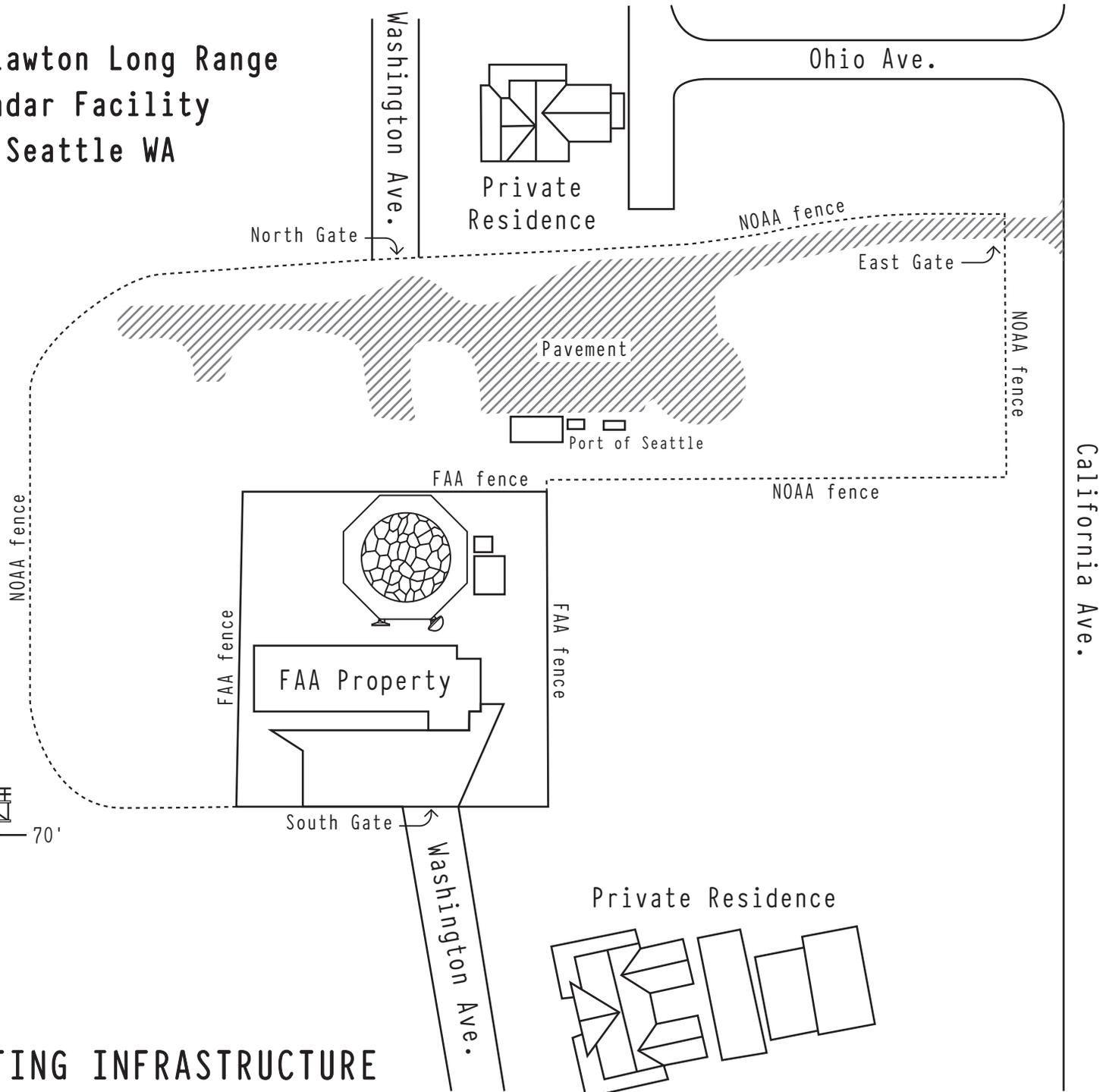
maximal setback available to the FAA - the distance from the center of the tower to the private property line on the north.

- 4) The Vehicle-exclusion Zone would be defined by a row of boulders, or equivalent barriers weighing approx. 2000 pounds each and measuring approximately 3 feet in diameter with base buried 6-12" deep. 4 foot gaps between each will preclude any vehicle intrusion but allow free passage of pedestrian-only traffic. Total number of such boulders needed would be approximately 90.
- 5) The current north gate (rarely used) and east gate (used for Port of Seattle access) be combined into a single gated access point that would be incorporated into the row of boulders to the northeast. Access would be off California Ave via a single lane gravel road lined by large woody debris to discourage off road use. The south gate - primary access for the FAA, would not change.
- 6) The Vehicle Exclusion Zone would be regularly mowed grass to maintain maximum line of sight capabilities. It could be temporarily fenced off from the public for any needed radar tower maintenance.
- 7) Legal ownership of properties is not addressed by this proposal and would be negotiated between the City and the FAA.
- 8) The site lies within the Fort Lawton Historic District. Any changes to the current structures, including fencing, would be subject to approval by the Seattle Historic Landmarks Preservation Board.

Fort Lawton Long Range Radar Facility Seattle WA

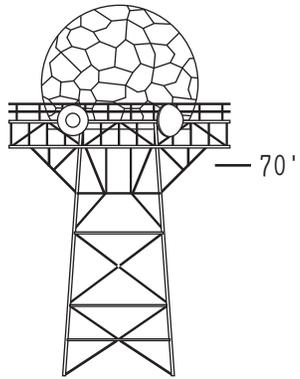


EXISTING INFRASTRUCTURE

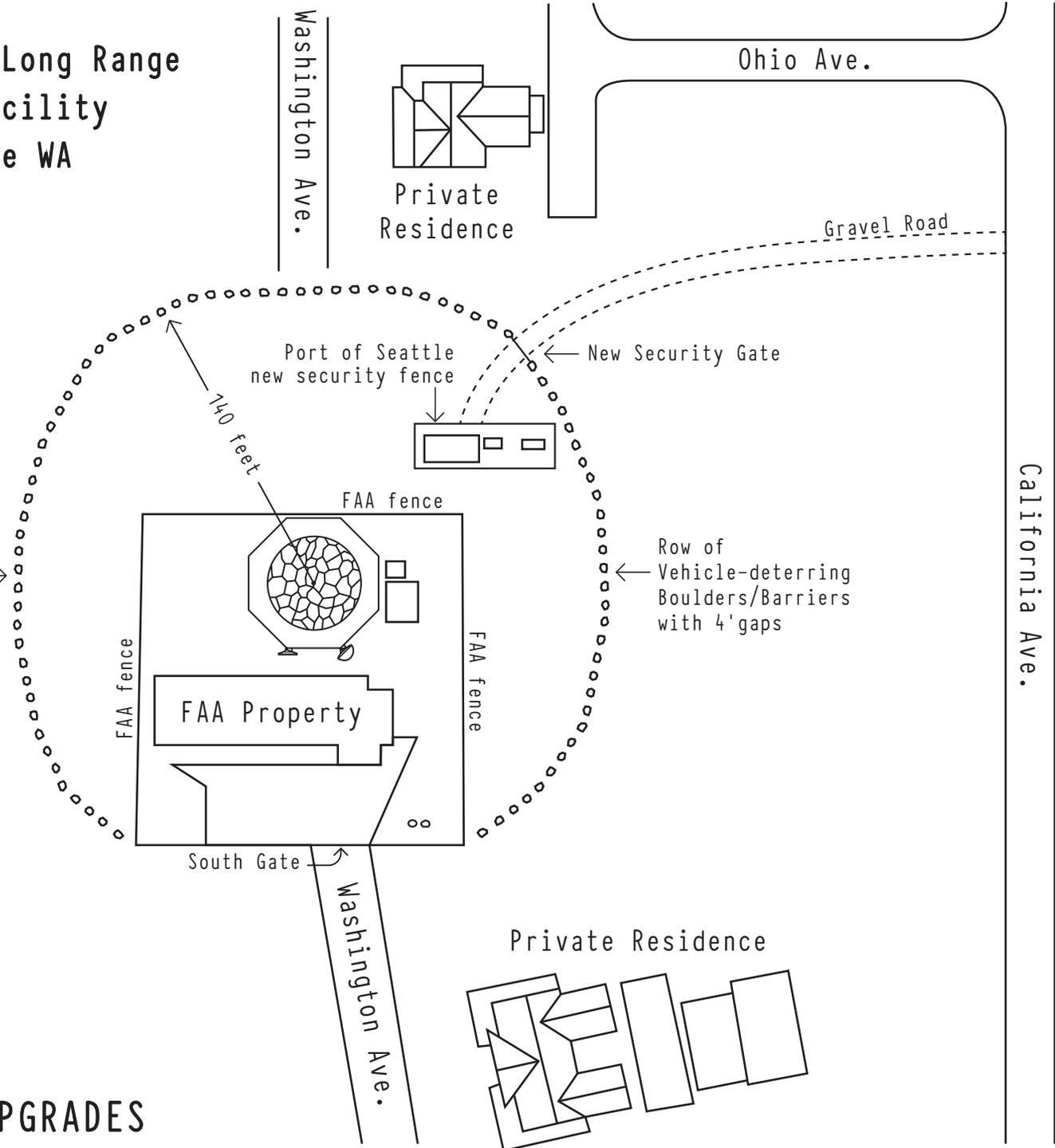


Fort Lawton Long Range Radar Facility Seattle WA

North



PROPOSED UPGRADES



Washington Ave.

Private Residence

Ohio Ave.

Gravel Road

Port of Seattle
new security fence

New Security Gate

740 feet

FAA fence

Row of
Vehicle-detering
Boulders/Barriers
with 4'gaps

Row of
Vehicle-detering
Boulders/Barriers
with 4'gaps

FAA fence

FAA fence

FAA Property

South Gate

Washington Ave.

California Ave.

Private Residence

Fort Lawton Long Range
Radar Facility
Seattle WA

North



Washington Ave.

Ohio Ave.

Private Residence

Gravel Road

Port of Seattle
new security fence

New Security Gate

20 feet

FAA fence

Row of
Vehicle-detering
Boulders/Barriers
with 4' gaps

Row of
Vehicle-detering
Boulders/Barriers
with 4' gaps

FAA fence

FAA fence

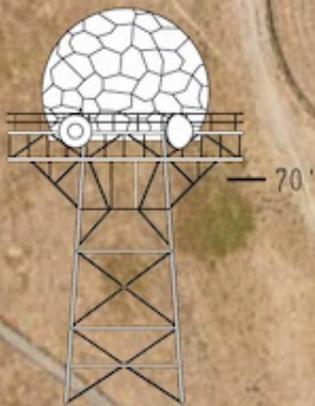
FAA Property

South Gate

Washington Ave.

California Ave.

Private Residence



70'

PROPOSED UPGRADES















