

PUBLIC DEFENDER ASSOCIATION  
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Dear Friends of Little Saigon & Navigation Center Community Task Force:

We are writing in response to the opportunity to comment on the mitigation plan under discussion for the Navigation Center, planned to open in Little Saigon later this summer.

In general, as you may know, our office is supportive of the principles underlying the Navigation Center. It has the potential to serve as a low-barrier point of entry for people currently living outside, who can “come as they are” and stay inside while a good housing match for their circumstances can be located. From our perspective as advocates for alternatives to the mass incarceration of people with substance use disorder, and understanding that people with criminal history living outdoors is negative for those people and for surrounding neighborhoods alike, the harm reduction principles of the Navigation Center model represent a step forward in finding practical solutions for the large number of people who presently have no viable alternative to living outside. However, a number of questions remain outstanding regarding the proposed model, the answers to which have substantial bearing on the potential ability of the model to meet the needs of both the individuals to be served and the community in which the Center is located. Moreover, we can clearly see that the process through which this project came to be situated in Little Saigon did not engage the neighborhood as a partner and was not well-calculated to create support for the effort in the neighborhood because of many significant reasons including the lack of intentional dialogue with the Chinatown-International (C/ID) District Public Safety and Neighborhood Vitality Task Force and the resulting C/ID Steering Committee, which is intended to be partnership between the City and community to improve communication and coordination in addressing public safety and livability.

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What follow are some issues we have identified, which may be of significance in your dialogue with City officials as to how the Navigation Center operates.

**How will Navigation Center residents be rapidly placed in permanent housing?**

People with high barriers to housing, including criminal records and active drug use, need permanent housing to successfully stabilize under the proven model of Housing First that the City and County have adopted. The Navigation Center model is aligned with Housing First principles, as it is meant to place high barrier individuals on a pathway to permanent housing. There has been conflicting information coming from city officials as to whether residents will be confined to a 30-day maximum stay at the Navigation Center or whether residents may stay until they are placed in housing.

If a 30-day maximum rule is instituted, it appears likely to send Navigation Center residents quickly back to the streets instead of into permanent housing given the slow pace of placement. In San Francisco, where the new 30 day maximum stay policy was put in place as of January 2017, observers have been left scratching their heads as to the value of the center compared to its stated goals of helping high barrier persons stabilize and transition into permanent housing. As a San Francisco homeless advocate put “it’s just cycling folks from the streets to the Navigation Center and back to the streets again,” which is destabilizing and causes additional trauma.<sup>1</sup>

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<sup>1</sup> Laura Waxman, *Navigation Center for the Homeless Switches Focus from Housing to Triage*, Mission Local, Jan. 19, 2017.

If Navigation Center residents are allowed to stay beyond 30 days until placed—a better approach—it is unlikely they will be rapidly placed in permanent housing under current circumstances.<sup>2</sup> Published data on first-year outcomes at San Francisco’s Navigation Center—which City officials site as the model for the Seattle effort—indicate that the average stay has been 88 days in length.<sup>3</sup> Likewise, in Seattle, highest barrier individuals are likely to be placed in permanent housing at a snail’s pace because they are not prioritized by the Coordinated Entry homeless housing system, but instead are far down the waitlist for permanent homeless housing. For the Navigation Center model to function well, high barrier individuals must be prioritized for permanent homeless housing, and other solutions to rapidly house high barrier individuals must also be explored.

Given these scenarios, it is not clear what measures the City will take to ensure that Navigation Center clients are neither evicted after 30 days nor effectively stuck in the Center and instead are rapidly placed in permanent housing in line with the original vision. Clarity on this point will be important in evaluating whether the Center is meeting its intended purpose.

**Will the Navigation Center help high barrier individuals if it focuses on individuals in the High Band of Coordinated Entry?**

As we understand it, one way that is being considered to more effectively place persons from the Navigation Center into housing is to focus on persons who are in the “High Band” of the Coordinated Entry for All initiative—those who sit at the top of the waitlist for homeless housing under the Coordinated Entry prioritization system. If this is the case the Navigation Center will leave out high barrier individuals with active drug use and criminal records in contrast to the original goal for setting up the Navigation Center.

Under the test to assess a homeless individual’s priority within Coordinated Entry (the VI-SPDAT), High Band scores go to those who are “highly vulnerable.” Highly vulnerable individuals under the test’s factors are persons who are generally unable to live independently and typically present some combination of serious mental illness, cognitive issues, physical sickness, and/or age. Meanwhile, individuals with high barriers to admission, such as criminal records and active drug use, are typically more capable of independent living (despite behavioral health issues including substance use and minor mental illness) and typically score lower on the test, in the Middle Band. Middle Band scorers have middle priority; they generally have much longer wait times on the waitlist and if anything get short term and temporary homeless housing instead of permanent homeless housing. In brief, a High Band focus will likely leave out the very people the Navigation Center was intended to address: high barrier individuals left out of the homeless shelter and housing system (due to their drug use and their Middle Band status within Coordinated Entry) and left out of the general housing market (due to their criminal records)

If individuals at the high end of the Coordinated Entry for All priority list are prioritized for entry into the Navigation Center, it is not clear how the Navigation Center will serve neglected high barrier individuals as intended.

**How will substance use onsite be accommodated in a way that protects public health and safety?**

The Navigation Center is designed to serve those who, among other barriers to housing, are living with

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<sup>2</sup> San Francisco officials state that new Navigation Centers they are building (including a second center slated to open in June 2017) will maintain the stay until placed rule, while only the original Mission area center will have the 30-day maximum rule. *Id.*

<sup>3</sup> City of San Francisco, Office of the Controller, *San Francisco Navigation Center, Year-End Evaluation*, p. 17. (found at <http://dhsh.sfgov.org/wp-content/uploads/2016/06/Nav-Center-1yr-Eval-Final-6-21-16.pdf>)

untreated substance use disorder. The Mayor's statements on the Navigation Center have centered on this issue; for example, the Mayor's press release about the launch of the Navigation Center emphasizes that a key distinguishing feature from a policy perspective is that the Navigation Center is meant to target persons with opiate addiction and is meant to take a harm reduction approach.

We applaud the effort to make sure that people who use drugs are served by the Navigation Center – it is an approach we fully support and champion. However, it such an approach must take into account the realities of substance use disorder. People who are living with substance use disorder and staying at the Navigation Center will use drugs. Without provision of an appropriate location, such as a supervised consumption space, the drug use is likely to occur in inappropriate locations either on or off site, increasing the risk of public health harm to those staying at the Center, as well as potentially contributing to drug use in the area surrounding the Center.

It is important that there be clarity about how the Navigation Center will accommodate clients who are living with untreated substance use disorder in a way that does not force that use into inappropriate locations on or off site. A ban on active users residing in the Navigation Center will not line up with the intended no-barrier purpose of the Center. If active users are in the Center, neighbors understandably need to understand where drug use will be occurring. Displacing it onto surrounding streets is not a plan, nor is unacknowledged and unplanned use in the Center.

**Will There Be A Commitment to Additional Navigation Centers in Other Neighborhoods?**

For those who accept the core principles underlying the Navigation Center, it does not make much sense to have such services concentrated in only one neighborhood. While we understand the value of establishing a “proof of concept” in a single location, it seems important that the City make a commitment to expanding this approach to other neighborhoods in the near term, so that the City-wide need is not concentrated in a single neighborhood, particularly one that feels it has been comparatively underserved by desirable City services and heavily affected by a concentration of people living outdoors.

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We look forward to working with the Task Force and the neighborhood as these conversations move ahead. We appreciate the spirit of problem-solving the neighborhood has brought to the discussion to date, and the understanding of the need for no-barrier housing solutions.

Sincerely,



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