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April 8, 2015

The Honorable Ed Murray, Mayor of Seattle
Honorable Seattle City Council Members
Acting Parks Superintendent Christopher Williams
Incoming Parks Superintendent Jesús Aguirre
Honorable Board of Park Commissioners

Dear Mr. Mayor, City Council Members, Superintendents, and Park Commissioners:

I am writing on behalf of the Lake City Neighborhood Alliance (LCNA), an alliance of 24 member groups representing neighborhood, business, faith, school, special-issue, and service-provider groups throughout Lake City. Although our mission is to protect and enhance the quality of life in the greater Lake City area, LCNA is engaged in City-wide issues as well. The threat to natural areas and greenbelts by supplemental active recreational uses is one of those issues. The Lake City area is home to a number of City-classified natural areas/greenbelts on Thornton Creek: Licorice Fern, Homewood Park, Thornton Creek North Branch, Beaver Pond, Victory Creek, Kingfisher, LaVilla Meadows, Thornton Creek at Sand Point; plus University Lake Shore Place, and nearby Jackson Park Golf Course and Matthews Beach Park. Thornton Creek Alliance is a member of LCNA. Lake City has a strong, local, vested interest in natural areas and greenbelts.

LCNA urges you to:

1. Maintain passive recreational uses (such as, hiking, wildlife viewing, stewardship, environmental education, environmental research) per current Seattle Department of Parks and Recreation 2005 Best Management Practices: Natural Areas (BMP);
2. Reject any supplemental, active recreational uses in any City-classified natural area and/or greenbelt;
3. Base policies on science as opposed to values;
4. Require wider and more transparent vetting of any proposed change in natural area and greenbelt use guidelines or policy in Seattle.

LCNA strongly believes that "supplemental" uses will adversely affect any and all Seattle natural areas and greenbelts. Instituting even the least impactful active recreational supplemental uses in these areas will be a slippery slope.

To be clear, LCNA's immediate concern is about Cheasty Greenspace, the "skunk on the table", as Acting Superintendent Christopher Williams called it at the Natural Area and Greenbelt Supplemental Use Guidelines Mini-Summit on April 4. Cheasty Greenspace first came to our attention as a major concern last summer when the Department of Neighborhoods expedited approval of the Cheasty Greenspace Trails and Bike Pilot Project. We were particularly concerned about this action foreshadowing a change in policy for natural area/greenbelt designations. LCNA wrote a letter (7/14/14) to Mayor Murray and Council Members Godden, Bagshaw, and Harrell urging their recognition that any change in policy that reduces the protection afforded natural areas requires vetting throughout the community.

We were grateful to City Council for recognizing that mountain bike (or BMX, bicycle motocross) trails through Cheasty Greenspace were too extreme, approving instead the 3-year pilot perimeter mountain bike trail. Yet, now Parks is proposing supplemental uses before any data are available from this pilot project. Further, Parks will apparently not consider the still-to-be-drafted Supplemental Use Guidelines an actual change to the policies in the BMP, but rather as addenda applied at the Superintendent's discretion.

The BMP Goal Statement, as quoted below, illustrates the significance of any proposed supplemental, active recreational uses on BMP's mission:

Our goal is to develop a sustainable resource that protects, optimizes, enhances, and increases our natural environments. These environments will provide opportunities for observing and enjoying urban wildlife, engaging in environmental education, and participating in restoration activities.

Our maintenance programs will incorporate staff expertise and adaptive management strategies based on the best available science of the Pacific Northwest ecosystem, wildlife, and vegetation management. We will create Vegetation Management Plans (VMPs) for individual forested areas and parks, in order to standardize our planning, design, and maintenance activities. We will strive to enhance public safety, optimize tree canopy, improve our trail system and ecosystem health, and manage green infrastructure assets effectively in all natural areas.

MAINTAIN PASSIVE RECREATIONAL USES

Natural areas serve as wildlife habitats and urban respites where users can enjoy passive recreational activities. According to Parks' own survey, 78 percent of all park users are there to walk. Of critical importance, any activity allowed in natural areas and greenbelts must be compatible with the protection of natural resources. Preserving natural areas in our increasingly dense, urbanized city should be of paramount concern to all Seattleites, and to elected and appointed stewards of our parks and environment. Seattle now has over 400 parks and green areas covering more than 6,200 acres. Surely active recreational uses can be added to existing parks not classified as natural areas and greenbelts.

REJECT SUPPLEMENTAL ACTIVE USES

Active recreational uses are incompatible with people out to enjoy a quiet nature walk. Allowing bicycles of any kind into natural areas will neither foster social equity nor open areas to underserved groups. Mountain bikes will not increase access for people who use mobility aids. Adding mountain bike trails simply allows a particular group that already has access elsewhere to enjoy the use of areas that are particularly conducive to quiet, passive use, with potentially significant impact on those qualities. These truly are special areas, and their integrity must be protected.

We might take a lesson from our neighbor to the south. Portland's River View Natural Area was for decades used by mountain bikers prior to its recent acquisition as a park. Assuming, that continued use would be approved, the Northwest Trail Alliance submitted an ambitious plan for the area that included six new mountain bike trails. That group volunteered many hours of cleaning up the area and restoring and maintaining existing trails to help make their case to the City—similar to the work that the Friends of Cheasty Greenspace at Mountain View have done. Yet the City of Portland recently set a policy prohibiting mountain biking in River View Natural Area due to concerns regarding impacts on the watershed and the need to protect sensitive and threatened wildlife and habitat. Portland Parks chose to exercise an abundance of caution to protect this high-value resource.

USE SCIENCE-BASED NOT VALUES-BASED POLICY

What is "values-based" policy? And how do personal values trump science as the guide to policy development for the stewardship of natural areas and greenbelts? That is of course a divisive argument in national politics, but it seems very far out of character for Seattle. BMP's goal statement rightly is science based. Natural areas serve important eco-functions by renewing our air supply, cleaning the air

of airborne particles, absorbing ground-level greenhouse gases, and absorbing and filtering water. Creating mountain bike trails will require that plants and natural vegetation be removed, soil be re-graded, and drainage engineered to prevent erosion—which will be difficult to prevent on wet, fragile, steep slopes. Science tells us that trails result in compressed, dead soil in which nothing will grow. Further, any off-trail uses—observations suggest fencing is required to keep BMX riders on trails—act as seed vectors bringing in invasive plants. Stewardship in most natural areas includes the removal of invasive plant species. More trails and more intensive use equal less nature.

We are well aware that the population of Seattle is expected to soar by 120,000 residents by 2035. We appreciate the values associated with active recreation. But we also feel strongly that as Seattle continues to grow in population and become even more urbanized, the special qualities of natural areas and greenbelts will only be that much more critical to our well-being.

CONDUCT WIDE, INCLUSIVE, TRANSPARENT VETTING

Parks outreach on this issue has been conducted through an online “Mindmixer” survey, three focus groups, and a Mini-Summit. Many of us in LCNA attempted to respond to the values-based Mindmixer survey. There were several major issues with it—inappropriate personal information required; bias; and level of difficulty.

The focus group I attended included about 15 people, with all but two or three strongly in favor of preserving natural areas and restricting uses. However, the summation made clear that supplemental use guidelines for natural areas were moving forward regardless.

The Mini-Summit was attended by perhaps 60 people. We were not a racially diverse group. The expert panelists were never asked nor did they state their opinion about maintaining passive-uses vs. adding supplemental active uses. No questions were accepted from the floor but were submitted in writing. It was not clear how the questions that were asked had been selected. And again, at the end we were told that supplemental use guidelines are moving forward. The process appeared to be completely unresponsive to the concerns of many in the audience. There was no information about how exactly the supplemental uses would be selected. Should work on supplemental use guidelines move forward despite these many objections, we hope to be given the opportunity to review the draft when it is available.

Vetting should start with making the raw data—counts, comments—available for review. Was the decision to develop supplement use guidelines, or to suspend consideration of supplement use guidelines, credible? Is that decision supported by science?

In any case, it is certain that there must be wider outreach before any changes are adopted.

LCNA believes changes in our natural areas/greenbelts through active recreational uses would be irrevocable. Given that, decisions regarding their use merit a deliberate, transparent, inclusive process, rather than the pre-ordained path Parks has taken.

Please do not hesitate to contact me if you have questions.

Very sincerely,



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