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October 20, 2009

Ms. Sandy Brooks, Coordinator
Board of Park Commissioners
Seattle Department of Parks and Recreation
100 Dexter Avenue, N.
Seattle, Washington 98109

Regarding: Proposed Park Classification Policy and Failure to include Green LAKE

Dear Ms. Brooks,

1.) Purpose of letter:

I am writing on behalf of the Friends of Green Lake to comment on the proposed classification of Seattle City Parks, in general; and the proposed classification for Green Lake Park, in particular

2.) Friends of Green Lake:

Friends of Green Lake is a citizens' organization that works for the long-term protection of the watershed and water quality of Green LAKE, to benefit both recreational users and wildlife. Friends of Green Lake (FOGL) was established in the spring of 2003 in response to Board of Health closures of The LAKE in the summers of 1999, 2002 and 2003 because of extensive blooms of bluegreen algae.

FOGL continues to monitor The Lake for clarity, temperature and nutrients; to educate the public about practices that help protect The Lake; to conduct service projects that remove invasive aquatic weeds and keep the shoreline clean; and to advocate for comprehensive, integrated management of The Lake and its watershed, which is the surrounding Park.

3.) Green Lake Park, an Olmsted Park, is the most visited city park in Washington:

There are no private lands around Green LAKE, only the parkland administered by the Seattle Department of Parks and Recreation (DPR), which is also named Green Lake. Green Lake Park was constructed by severing The Lake from its contributing streams, and lowering the water level to expose the surrounding acreage, which became the land area for Green Lake Park. This alteration of the Lake, to create a city park, was recommended by the Olmsted brothers.

The Trust for Public Lands, Center for City Park Excellence, identifies Green Lake Park as the most visited municipal park in the state. To put the popularity of Green Lake Park in perspective, the Burke Gilman Trail, the next most visited park in Seattle, has less than 1/3 the annual visitors that come to Green Lake (TPL, September, 2009).

4.) The LAKE should be included as a DPR asset:

The unique attraction at Green Lake Park is the sparkling 250-acre lake at its center, where the DPR conducts swimming, rowing, sailboarding, fishing, kayaking, paddleboating, and canoeing. Yet the 2009 Strategic Action Plan (SAP) fails to identify The LAKE at Green Lake as a DPR asset, even though a photo of The LAKE adorns the back cover of the 2008 SAP. This has important consequences, for example, it is difficult to budget for the maintenance of an asset that isn't included in your accounts, or to plan for its future.

Similarly, in the Tentative Park Classification Assignments, Green Lake Park is identified as 67.7 acres. This is only the area of the park land that completely surrounds the 250-acre Lake that is the heart of Green Lake Park. **No other entity controls or manages Green LAKE.** We repeat our concern that an area which is not included in the Parks Department "accounting" is too easy to overlook in budgets, management, maintenance, and planning.

For comparison, we notice that the proposed classifications for the Emma Schmitz Overlook, the Me-Kwa-Mooks Park and the Herrings House Park, all note: "lot of acreage is underwater"; and that at Discovery Park, 306 acres of tidelands are included as park area. Being covered by water has not prohibited the inclusion of these areas as DPR assets. Thus, it is appropriate to include The LAKE area of Green Lake Park in the list of assets in the Strategic Action Plan, and to include it in the proposed system to categorize the character and use of park areas.

5.) Large parks should be divided into different classifications:

The proposed classification assignments, in general, are not in accordance with the policy adopted as part of the Strategic Action Plan (September, 2008) which states: "*Create and adopt a consistent **land** classification system that defines appropriate uses to identify the capacity of each land resource.*" Of course, we think the emphasis on LAND resource, rather than just resource, is an error. Seattle is very fortunate to have Green LAKE at the heart of its most visited park. That issue aside, what the SAP statement indicates is a system of classifications based on the capacity of each resource area, not a uniform classification across the entire area of large parks. For example, all 313 acres of Warren G. Magnuson Park is identified as "recreational" despite the recent completion of 20+ acres of wetland habitat, the presence in some areas of very steep hillsides (Promontory Point) and the many volunteer hours that have been invested in the restoration of habitat at this park.

A similar surprise is to find Golden Gardens Park, much of which is a developed waterfront with extensive parking, numerous permanent fire pits and a refurbished bath house, entirely classified as "natural area". There also is a very steep hillside within Golden Gardens and a tidal marsh, which are appropriate to classify as "natural", thus this park is appropriately subdivided into "recreational" and "natural" subareas, based on the capacity of the resource. Woodland Park (98 acres), currently classified entirely as "recreation", also includes an extensive steep slope vegetated with large trees and sword fern. This slope is often scarred by mountain bike use, which has caused erosion, although there aren't any sanctioned trails. If Woodland Park is entirely classified "recreation", it will make it more difficult for DPR to prohibit mountain bikes on these steep slopes. Dividing this park, and other large parks, into subareas with different classifications, would make it easier to manage each area appropriately.

6.) Some smaller parks are already subdivided into different classifications.

A more useful policy would subdivide the large parks into smaller areas that are appropriately identified for "special use", "recreation", "habitat", or "open space" (a classification that is missing in the current proposal). It appears that Kubota Gardens is divided into a 19 acre "special use" area (the garden) and a 16-acre "natural" area. Bitter Lake classifies a 3-acre area named Open Space "natural" area and a 7.5-acre playfield "community" park at identical addresses. If these smaller parks can be subdivided into appropriate use classifications, then certainly our larger parks are deserving of this level of planning. Even the Purpose Statement of the Draft Classification Policy notes that "soil, hydrology, vegetation, and habitat" are important considerations in determining park area classifications, but the proposed classifications appear to ignore this statement and do not provide any rationale for proposed classifications other than size, amenities and location. How can an approach that ignores the natural characteristics of large park areas "steward Seattle's Parks and open spaces for long-term sustainability", as required by the 2008 Strategic Action Plan?

7.) The proposal/policy should show the distribution of park area classifications.

There also is concern that most of the recreation acreage, as proposed, is located within one geographic area of the City. One analysis, for planning purposes, should be a City map that shows all the public park areas (i.e., not the zoo, aquarium, parks administrative offices, or storage facilities) with each classification type in a distinct color. This analysis should be available to the public before the classification of the parks is adopted, to demonstrate the geographic distribution of park area classifications. This would facilitate planning for land acquisition and park development, an identified goal of the policy.

Thank-you for considering these comments from the Friends of Green Lake. This policy and classification scheme is very important to us, and to all Seattle citizens, because the classification of Park areas should be the foundation for management and planning of public areas under the control of DPR. Thus, it is very important to get

this right. Please think of Green LAKE as a DPR asset, and take the time to classify specific areas of our larger parks in ways appropriate to the natural landscape. The ultimate goal should be to equitably distribute opportunities for different types of park experiences around the City.

Sincerely,

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