



NORTH DISTRICT COUNCIL

Representing the North Seattle Neighborhoods of
Lake City • Northgate • Meadowbrook • Pinehurst • Maple Leaf • Cedar Park
• Victory Heights • Olympic Hills • Jackson Park • North Matthews Beach

June 25, 2015

Board of Park Commissioners
Seattle Department of Parks and Recreation

Dear Commissioners:

On behalf of the North District Council (NDC), NDC's Executive Committee is writing this letter to be included as part of your June 25th Public Hearing to receive public input on the proposed Natural Areas and Greenbelts Supplemental Use Guidelines. NDC represents 18 neighborhood and special-issue community groups in North Seattle who have expressed concerns about the proposed Supplemental Use Guidelines. Many of our neighborhoods are fortunate to have City-classified natural areas/greenspaces associated with Thornton Creek, and thus have a local as well as City-wide vested interest.

NDC's Executive Committee reviewed the City Council's approval and conditions of the Cheasty Greenspace Trails and Bike Park Large Fund (LF) Neighborhood Matching Fund (NMF) grant. The Council's approval process for LF NMF grants is usually routine, but due to the extraordinary community concerns expressed as part of the Council's review of this project, Council imposed a number of significant conditions as part of Ordinance No. 124546 (August 2014, corrected March 2015; Attachment 1), as listed below.

- Limits approval to 3-year pilot project of perimeter-only trail;
- Mandates full public process with technical review (engineering, environmental design, and community concerns) of the proposed design by Parks;
- Mandates evaluation criteria to be developed by Parks;
- Mandates design and evaluation criteria presentation to City Council for approval by Parks, which would then be filed with the City Clerk;
- Upon completion of project construction, mandates quarterly project evaluation reports by Parks to the Parks Council Committee;
- At the end of the 3-year pilot project, mandates reports of impact results by Parks to the Parks Committee;
- Makes explicit that the expectation by Council is that the perimeter trail will be consistent with citywide greenbelt policies before any final decision is made by the City Council on the future of the perimeter trail.

The City Council's preliminary approval of the Cheasty Natural Area/Greenspace for mountain bikes subject to these conditions has prompted Parks to propose Natural Area and Greenbelt Supplemental Use Guidelines that, if approved, ultimately will allow biking trails and challenge courses not only in Cheasty but in all Natural Areas and Greenbelts, possibly even before completion of the pilot study. (See first paragraph on page 3 of

Cedar Park Neighborhood Council

Douglas Park Cooperative

Lake City Community Council

Lake City Greenways

Lake City Townhouses

Lake City Farmers Market

Lake City Emergency

Communication HUB

Maple Leaf Community Council

Meadowbrook Community

Council

North Cedar Park Good Neighbors

Association

North Seattle Chamber of

Commerce

North End Health & Human

Services Co-op

Olympic Hills Neighborhood

Council

Pinehurst Community Council

South Cedar Park Good

Neighbors Association

Thornton Creek Alliance

Victory Heights Community

Council

proposed Supplemental Use Guidelines.)

The North District Council has the following concerns:

1. The City Council conditions for approval of the Cheasty perimeter mountain bike trail are dependent upon the evaluation of the project at the end of the Council-mandated 3-year pilot period. Therefore, it is inappropriate to approve any bike use or other new, active uses, in natural areas/greenbelts until the 3-year pilot period of the perimeter trail is completed, and data about potential impacts have been collected, made available for public review, and analyzed. The checklist criteria for evaluating the appropriateness of uses in natural areas and greenbelts are biased against a scientific perspective and towards values-based factors for these environmentally sensitive areas. The very nature of the natural areas and greenbelts requires criteria that will evaluate the physical impact of all new potential uses. The checklist criteria do not address the need for stewardship of these sensitive Park lands that must be preserved and protected. *Why is Parks staff recommending against a science-based approach to determine what uses are appropriate (low impact) in natural areas/greenbelts?* These natural areas and greenbelts are unique, environmentally sensitive areas that may require limited use to protect and preserve their value to our city. They comprise only 646 acres, representing a mere 10% of the 6,200 acres of Seattle's park lands.
2. The half-day Mini-Summit with the expert panel left many participants wondering why the panel was not asked to comment on the obvious question of whether mountain bikes are compatible in natural areas and greenbelts.
3. The City Council Greenspace Policy (Resolution 28653, adopted in 1993; Attachment 2) identified 30 natural areas and green spaces in the Park system, including Cheasty, and stated that these areas have been acquired for preservation purposes, such as preserving areas of nature landscape and habitat for wildlife, providing natural buffers between land use of different intensity, and mitigating the effects of noise, pollution, water runoff, and erosion. The Greenspace policy further states that, due to their natural environmental character, these areas will be used only for low impact activities and will complement City parks and other recreation uses that are used in a more active manner. No definition or studies were cited to define "low impact uses." NDC argues that mountain biking and other active uses in natural areas and greenbelts are not low impact, and therefore violate Resolution 28653.
4. The Parks Classification Policy (adopted in January of 2015; Attachment 3) states that greenbelts and natural areas, one of eight general types of park classifications, are park sites established for the protection and stewardship of wildlife, habitat and natural systems support which may allow some level of low impact uses. "Low impact use" was not defined in this policy. NDC asserts that mountain biking and other active uses in natural areas and greenbelts are not low use, and thus violate the Parks Classification Policy.
5. The other compelling policy adopted by Parks in 1995 is Bicycle Usage (Attachment 4). Its purpose was "to establish a policy for responsible bicycle use in Seattle Parks system." It was implemented as a direct result of damage in sensitive natural areas by excessive bicycle use. The policy prohibits the use of bicycles in environmentally sensitive areas and natural areas since they could cause damage to plants, soils, streams and natural elements of these park areas. The bicycle policy implies that bicycle use in environmentally sensitive natural areas and greenspaces is not a low impact use and that it will have identifiable impacts to these areas. And yet, the proposed Supplemental Use Guidelines state "biking trails and challenge courses will be allowed while minimizing adverse environmental impacts." These proposed guidelines provide no data to support that biking trails and challenge courses can in fact be developed in a way that causes only minimal, inconsequential environmental impact. What was true in 1995 about damage from mountain bikes is certainly as true today. NDC contends that mountain biking, challenge courses, and other active uses in natural areas and greenbelts violate Park's own Bicycle Usage Policy, which is as relevant and necessary today as it was 20 years ago.

Clearly, there is a need to define “low impact use” across all policies using measurable, science-based criteria. The evaluation requirement for the Cheasty Greenspace Trails and Bike Park project could be used to develop impact criteria. Those data would be gathered most appropriately by Park’s Natural Resources Unit, which is charged with maintaining and installing trails. Until completion of the 3-year pilot project, the proposed Supplemental Use Guidelines should be set aside and then re-written once impacts are known.

The introduction of any new uses in natural areas and greenbelts most likely will have an impact on the current maintenance requirement of these areas since we understand that there is only one trail crew for the entire park system. Mountain bike trails should be developed on the other 4,600 acres of developed, non-sensitive park land and not in our limited and fragile natural areas and greenbelts.

In summary, the North District Council urges the Park Board to:

1. Set aside the proposed Supplemental Use Guidelines, until the 3-year trial period for the Cheasty perimeter trail project is completed, and scientific data are collected and evaluated to determine negative impact on the ecosystem of these vulnerable areas.
2. Establish a moratorium on the use of mountain bikes and any other new uses in natural areas and green belts until the 3-year trial period for the Cheasty perimeter trail project is completed, and scientific data are collected and evaluated to determine negative impact on the ecosystem of these vulnerable areas.
3. Change the checklist criteria to be scientifically based to determine if the proposed use is low impact and compatible with these environmentally sensitive areas. Include stewardship as an evaluation criterion for any proposed use, since Parks’ has a stewardship obligation to protect and preserve these unique, fragile areas. The checklist criteria should include an assessment of whether the proposed use can be accommodated in some other park location rather than in a natural area or greenbelt.
4. If the Cheasty development plan has not yet been submitted to City Council for approval, revise the evaluation criteria to insure that it will include scientific data to determine what level that bike usage in Cheasty will have and whether that impact fits a newly established definition of a low impact use that would be consistent across all Park policies.

North District Council would appreciate your careful consideration of all our concerns and suggested actions related to the proposed Supplemental Use Guidelines.

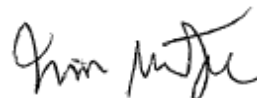
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cc: City Council President Burgess; Councilmembers Bagshaw, Godden, Harrell, Licata, O’Brien, Okamoto, Rasmussen, Sawant; Parks Superintendent Jesús Aguirre; Parks Deputy Superintendent Williams; Seattle Metropolitan Parks District, District 5 Representative Jessica Farmer; DoN Director Kathy Nyland; City Neighborhood Council Co-Chairs Laine Ross and Catherine Weatbrook; North District Coordinator Christa Dumpys