

Thornton Creek Alliance  
Post Office Box 25690  
Seattle, Washington 98165-1190

June 24, 2015

Seattle Board of Park Commissioners  
100 Dexter Avenue North  
Seattle, Washington 98109

RE: **Comments on Proposed Supplemental Use Guidelines for Natural Areas**

Dear Commissioners:

Thornton Creek Alliance has been promoting stewardship of natural areas within the Thornton Creek basin in northeast Seattle since 1993. We have participated actively in the Seattle Parks Department's process to develop Supplemental Use Guidelines for natural areas and greenbelts. We have reviewed the currently proposed guidelines in detail and, on June 16, we provided a tour of some of our natural areas to Susanne Rockwell, the Strategic Advisor in charge of developing the proposed guidelines, which provided us an opportunity to discuss the guidelines and how they might apply to Thornton Creek natural areas in the future. We appreciate Ms. Rockwell's sincere interest in the health of Seattle's natural areas and her readiness to discuss the proposed guidelines with us in detail. Nevertheless, we believe that the current proposal needs amendment.

Nowhere in the current proposal is there a statement that acknowledges existing City policy, adopted in 1993 and not proposed for change, that "Greenspaces, with their natural environmental character, will be used only for low-impact activities, and will complement the City's park and recreation system where open space may be used in a more active manner." If bicycle trails and challenge courses are going to be allowed at all in our natural areas—and Thornton Creek Alliance continues to doubt whether any exceptions to this existing policy are wise—why is there not at least a requirement in the proposed checklist that the proponents of such active uses demonstrate that they have considered alternative park locations, and a requirement that they articulate why the alternative locations are unacceptable?

Moreover, the proposed checklist is written as though negative impacts are unimaginable—all of the questions are put in strictly positive terms (e.g., "Does the use proposal enhance forest and/or habitat restoration efforts? Does the use proposal improve water quality and/or aquatic habitat?", etc. Potential answers are only Yes, No or Not Sure). Yet the whole reason this proposal is controversial is that some uses can have significant impacts on other uses. The policy itself states that "benefits of the proposed activity should be greater than potential impacts to the site." So why not place some responsibility on the proponent to acknowledge and mitigate for impacts, as is routine for all property development proposals? Questions on the checklist absolutely must acknowledge the possibility of negative impacts, and should require proposed mitigation.

The very name "natural areas" is intended to communicate the primary goal for these places. The existing greenspaces policy allows and even encourages walking and hiking trails through natural areas, which we support, when thoughtfully sited, designed and built. The existing city bicycle policy does not allow

bicycle trails in natural areas. A “values-based” approach to our natural areas should continue to uphold the primary value of nature for these special places in our landscape and our communities. The current proposal, by not communicating the preference that active uses be sited elsewhere and by not requiring proponents to closely consider potential impacts to the primary purpose of natural areas, is fundamentally flawed and in conflict with what remains and is intended to remain adopted City policy.

Thank you for the opportunity to comment on the proposed guidelines. If you have any questions about our comments, please contact either Ruth Williams, at [ruthalice@comcast.net](mailto:ruthalice@comcast.net) or 206-365-8965, or John Lombard, at [jlombardwriter@gmail.com](mailto:jlombardwriter@gmail.com) or 206-788-6443.

Sincerely,



Ruth Williams,  
President  
Thornton Creek Alliance



John Lombard,  
Past-President  
Thornton Creek Alliance

cc: Seattle City Council  
Parks Superintendent Jesús Aguirre  
Parks Deputy Superintendent Christopher Williams  
Seattle Metropolitan Parks District  
District Five Representative Jessica Farmer

**THORNTON CREEK ALLIANCE (TCA)**, founded in 1993, is an all-volunteer grassroots, nonprofit organization of 100 members dedicated to preserving and restoring an ecological balance throughout the Thornton Creek watershed. Our goal is to benefit the watershed by encouraging individuals, neighborhoods, schools, groups, businesses, agencies, and government to work together in addressing the environmental restoration of the creek system including: water quality, stabilization of water flow, flood prevention, and habitat improvement through education, collaboration, and community involvement.



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