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Seattle Board of Park Commissioners  
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Dear Park Commissioners,

Please accept this letter as testimony from the Magnuson Environmental Stewardship Alliance for your hearing on Natural Areas and Green Belts Supplemental Use Guidelines.

Unfortunately the draft policy is about exploitation rather than protection, preservation, and wise use of natural areas. Given the limited amount of natural area in the City we think high standards for protection and preservation should determine acceptable use. A checklist for considering uses should be thorough enough to catch any threats to or conflicts with the essential functions natural areas provide.

As background you may be curious to know that the Magnuson Environmental Stewardship has been working to educate and involve the community in stewardship of Warren G. Magnuson Park for more than sixteen years. During this time we have obtained and administered large grants, advocated for park improvements, served on advisory committees, lead thousands of people participating in work parties, and stewarded substantial portions of the park. Much of the restoration work outside of the professionally built wetland projects was done by us or volunteers lead by us. In a typical year, we provide the park with many donated plants and over \$100,000 worth of volunteer labor.

Our testimony covers several aspects of the Guidelines under a separate headings.

**Guidelines Should Cover Areas Managed as Natural Area plus Classified Natural Areas and Greenbelts**

Protection and use issues are not restricted to the narrow "Classified Natural Areas and Greenbelts" park type category. Therefore checklists covering use or protection should cover all areas managed as natural areas not just those in the narrow "Classified Natural Areas and Greenbelts" park classification category.

This is not a hypothetical issue. We have seen areas managed as natural areas converted to other uses within Magnuson Park and along the Burke-Gilman Trail without careful consideration of the sort of things which should be on a checklist. Decisions convert to other uses have been made or initiated on the whims of relatively low level Department employees and have seemed arbitrary and capricious.

Although staff may have given you some documents purported to show that other park classifications are somehow covered and not in need of protection or a checklist we think that if you study the issue

and ask appropriate questions you will find coverage is lacking. Portions of some parks have some level of protection due to being covered by City Council approved Master Plans or the like, but much area managed as natural area within the park system is not covered and is vulnerable to having use decisions made without adequate consideration.

Be aware that much of the public may be confused about what policy suggested in the draft memo from staff covers. Part of that is because the policy in some places including the title shortens “classified natural areas” to “natural areas” increasing chance that people will mistakenly think it covers more than the narrow “classified natural areas and greenbelts” category.

Also contributing to confusion is the map at the project website which shows areas managed as natural areas and green belts. Although informative, it adds to confusion because people looking at this map can come to think that the areas managed as natural areas shown on the map would be covered by the draft policy. This map is also somewhat misleading because areas managed as natural area within parks smaller than about 15 acres are not shown.

### **Management Measures Needed**

We suggest that any policy adopted requires the Department to publish periodic reports identifying all area managed as natural area, the amount of acreage managed as natural area, and the quality of the areas and acreage.

At present reasonable measures of the forested or Green Seattle Partnership portion of park land managed as natural area are available, but measures seem to be lacking for the other portions.

Having such measures covering all park land managed as natural area would help inform the public and elected officials and allow them to understand how the Department is managing the land and learn if amount of area and quality are increasing, steady, or diminishing.

Ideally such measures would be used to evaluate management performance with targets of area increase or stability and improving or high quality.

### **Natural Area Functions**

Any policy on protection or use of natural areas should identify and list the characteristics and benefits of natural areas which have resulted in them being highly valued by the public and accorded greater legal protections than other portions of the park system. Having those included in policy would help those applying it and using a checklist to understand the purpose. Listing the characteristics and benefits would reduce chance of those interpreting policy or using a checklist going astray.

Some of these functions are specifically included in City Council resolutions others have gained recognition since those resolutions were passed.

Functions City Council Resolutions include:

- Provide special environmental resources such as unique topographic features, important wildlife habitat, streams and wetlands, or water quality enhancement areas for streams, lakes, and wetlands.
- Preserve areas of natural land and habitat for wildlife

- Provide natural buffers between areas of different intensity or different character or identity
- Mitigate effects of noise and air pollution
- Help reduce need for constructed storm water systems
- Preserve the quality of natural drainage systems and thereby enhance stability of the land

Functions recognized in Seattle's Forest System Ecosystem Values (available at: [http://www.seattle.gov/trees/docs/Seattles\\_Forest\\_Ecosystem\\_Values\\_Report.pdf](http://www.seattle.gov/trees/docs/Seattles_Forest_Ecosystem_Values_Report.pdf)) which was published by the Green Cities Alliance (A partnership including the US Forest Service, Forterra, The City of Seattle, King County and the University of Washington) include:

- Reducing storm water runoff by intercepting rainfall, which reduces impacts to water quality in adjacent lakes and streams
- Lowering energy bills by reducing wind and sun exposure around buildings
- Providing habitat for wildlife
- Capturing and filtering air pollutants
- Improving the appearances of neighborhoods
- Increasing human well-being through recreation and personal restoration opportunities
- Improving public health as a result of services such as increased neighborhood walkability and cleaner air
- Carbon dioxide sequestration

Two additional benefits which should be included are:

- Reducing urban sprawl by making life in the city tolerable and reducing need for those who want to regularly experience nature to live outside the city.
- Reducing fuel consumption by decreasing need for urban dwellers to travel to areas outside the city to experience and gain benefits from nature.

### **Checklist Elements**

The checklist items in the draft are inadequate and do not consider many impacts which could diminish and detract from ability of natural areas to perform the essential functions which have accorded them special recognition. Some needed elements would include:

- Contribution to soil compaction
- Negative impact on wildlife nesting
- Proximity or noise being likely to cause wildlife flight initiation
- Proximity or noise being likely to cause wildlife stress initiation
- Damage to established vegetation
- Damage to recently planted, not fully established, vegetation
- Reduction of vegetated and habitat area due to foot print of the use.
- Negative impact on personal restoration activities dependent on tranquility
- Factors which would cause stress in other park users.
- Contribution to development of undesirable social trails
- Contribution to fragmentation of habitat areas -reduction of contiguous area
- Negative impact on wildlife corridors such as habitat reduction, physical barriers, or levels of disturbance which act as barriers.

### **Embedded Uses**

Mentioning pedestrian use on trails as a use is almost universally recognized as within the purposes of natural areas. Results from past Department surveys and the public engagement process for use guidelines have shown broad support for it.

However other uses have far less support, have not had full public vetting and scrutiny, and would be much more likely to detract from the unique values natural areas provide and less likely to pass checklist evaluation and thus should not be mentioned in the policy, but instead should be considered case by case and perhaps totally excluded if their negative impacts would be clearly unacceptable.

Giving controversial uses such as bikes skills and rope courses specific mention and favor in the policy seems an underhanded attempt to give them special favor without having them undergo full and careful consideration.

The Department's attempt to embedding favoritism for those sorts of uses seems particularly questionable, given that they were not mentioned or discussed in the public engagement process or advance presentations and that they are clearly controversial and would clearly have negative impacts on the essential functions of natural areas.

Although the sorts of controversial uses the Department is advocating would use nature as a setting they seem unlikely to do much to increase appreciation for nature. They are essentially consumer activities likely to require pay to play in form of an admission charge or substantial investment such as a well performing mountain bike. They are also likely to serve only a small percentage of the population and to diminish quality of the natural areas for most of the population.

Although new pedestrian trails are desirable plans for them should be reviewed under to guidelines with the aim of minimizing negative impacts and achieving overall optimization for the trails combined with other natural area functions.

### **The Department's desire to Change Use of Natural Areas**

As outsiders it is difficult for us to understand the origin and reasoning behind the Department's desire the change use of natural areas. Some of the reasons which have been offered don't make sense and actually favor present uses more than change. For instance, demand for present uses such as personal restoration will grow with population.

Supposed health benefits for a small segment of the population provided by some of the controversial uses would likely be outweighed by their diminishing the health benefits the areas could provide to many more people as places for walking and personal restoration.

Please be mindful that department staff has advantage over the public for influencing you. That is due to exposure over longer time duration, opportunity for repetition, having the last say, rich funding for effective presentations, more likelihood of personal interaction with commissioners, and more.

Human nature is such that a hard-working and smooth talking staff person addressing the commission for three or more presentations is likely to be heard better and perhaps with more sympathy than any member of the public limited to a two minute pitch.

Because cognitive dissonance theory suggests it takes considerable time to change beliefs after being presented with conflicting information the interval for you to absorb information offered by the public via the hearing may be too short to change beliefs founded on information the Department has been feeding the commission for a long while.

### **Comparison Communities**

Please keep in mind that most of the communities offered as examples in the draft tend to differ from Seattle due to their having more natural area. What can work in a place like Portland with a 5,000 acre plus natural area is different than here where total area and size of individual areas is much less.

### **Authority**

At least part of the Department's argument for changing natural area use seems to be based on authority more than fact or logic with the idea being that park professionals know best. It seems clear that to a large extent the draft policy was predetermined independent of the costly public engagement process.

That to a large extent the public engagement process for the use guidelines was a sham is evidenced by the following exchange from the Board of Park Commissioner's February 26, 2015 meeting.

Commissioner Brice Maryman asked:

*"Do you have any idea of how the guidelines might shape up?"*

And in response Christopher Williams said:

*"The Mayor announced in his state of the city address that 120,000 people will move here in forty years. That's a huge increase in the city's population. So I think it would be wrong to characterize our going into this meeting without having some idea or opinion of where we'd like to end up. So in all fairness I think we do have some idea or some concept and I think the way to get there and kind of navigate through a public meeting process is to go out and be up front with the public about we want to preserve what is sort of the best part of our natural areas and green belts to preserve and protect and we want to start there. But we also think these are areas which should be open for public use provided that we go through some transparent filtering process to make decisions. So we want to get the public's input on what that process would look like and what is important to protect and if there are areas that come to mind for people that ought to just be off limits we want to hear about that. But I think in the interests in transparency this is a public meeting where again we want to gather feedback but it's not the kind of public meeting where we are going to build a swing set and sort of ask people if do you want it here or do you want it here. We've got an idea as park professionals who manage the system and I just think being up front about that as we go out and talk with people is really smart and an important thing to do."*

Although we acknowledge park staff's experience and greatly respect various staff member's knowledge we don't think that it alone should be reason to adopt policy and that convincing reasons should be offered instead, if there are any, and fully scrutinized instead of being given blind acceptance.

The meaning of "park professionals" may only relate to job title and does not necessarily indicate strong education, deep thinking, and extensive experience. Certainly not all park professionals are professional in the sense of the Olmstead brothers or even at the level which comes to mind when thinking of the National Park Service.

Much of the Department's staff professionalism is restricted to niches and specializations. For the most part appreciation of nature or deep understanding of land management is lacking from the executive and senior levels of the Department.

Please also keep in mind that when looking at history of how various sections of the Department have been dominant over the years it seems a quest for personal job security has often factored in at least subconsciously. Thus advocacy for natural areas may be at a disadvantage if other uses provide more jobs and job security for existing staff.

### **Wisdom**

Many of the uses staff is advocating are not about enjoying or appreciating nature except as a setting for other activity. The role of nature for those is somewhat similar to how it is used in advertising to sell products like cars. Those uses are largely forms of consumption and seem less likely to build respect and value for nature than would more simple uses focused on nature itself and the personally restorative uses.

Thinking accumulated over millennia by philosophers and religions seems superior to that of present park staff.

The following extracts from the recent papal encyclical letter Laudato Si although from a representative of one faith share commonalities with the best thinking of the ages and serve as a better guide than what Park Department staff is offering. (the document is available at :

[http://w2.vatican.va/content/francesco/en/encyclicals/documents/papa-francesco\\_20150524\\_enciclica-laudato-si.html](http://w2.vatican.va/content/francesco/en/encyclicals/documents/papa-francesco_20150524_enciclica-laudato-si.html)).

*"Inner peace is closely related to care for ecology and for the common good because, lived out authentically, it is reflected in a balanced lifestyle together with a capacity for wonder which takes us to a deeper understanding of life. Nature is filled with words of love, but how can we listen to them amid constant noise, interminable and nerve-wracking distractions, or the cult of appearances? Many people today sense a profound imbalance which drives them to frenetic activity and makes them feel busy, in a constant hurry which in turn leads them to ride rough-shod over everything around them. This too affects how they treat the environment. An integral ecology includes taking time to recover a serene harmony with creation, reflecting on our lifestyle and our ideals, and contemplating the Creator who lives among us and surrounds us, whose presence "must not be contrived but found uncovered."*

*"Neighborhoods, even those recently built, are congested, chaotic and lacking in sufficient green space. We were not meant to be inundated by cement, asphalt, glass and metal, and deprived of physical contact with nature."*

*"The gadgets and technics forced upon him by the patterns of machine production and of abstract planning mass man accepts quite simply; they are the forms of life itself. To either a greater or lesser degree mass man is convinced that his conformity is both reasonable and just". This paradigm leads people to believe that they are free as long as they have the supposed freedom to consume. But those really free are the minority who wield economic and financial power. Amid this confusion, postmodern humanity has not yet achieved a new self-awareness capable of offering guidance and direction, and this lack of identity is a source of anxiety. We have too many means and only a few insubstantial ends."*

*"Christian spirituality proposes an alternative understanding of the quality of life, and encourages a prophetic and contemplative lifestyle, one capable of deep enjoyment free of the obsession with consumption. We need to take up an ancient lesson, found in different religious traditions and also in the Bible. It is the conviction that "less is more". A constant flood of new consumer goods can baffle the heart and prevent us from cherishing each thing and each moment. To be serenely present to each reality, however small it may be, opens us to much greater horizons of understanding and personal fulfilment. Christian spirituality proposes a growth marked by moderation and the capacity to be happy with little. It is a return to that simplicity which allows us to stop and appreciate the small things, to be grateful for the opportunities which life affords us, to be spiritually detached from what we possess, and not to succumb to sadness for what we lack. This implies avoiding the dynamic of dominion and the mere accumulation of pleasures."*

*Such sobriety, when lived freely and consciously, is liberating. It is not a lesser life or one lived with less intensity. On the contrary, it is a way of living life to the full. In reality, those who enjoy more and live better each moment are those who have given up dipping here and there, always on the look-out for what they do not have. They experience what it means to appreciate each person and each thing, learning familiarity with the simplest things and how to enjoy them. So they are able to shed unsatisfied needs, reducing their obsessiveness and weariness. Even living on little, they can live a lot, above all when they cultivate other pleasures and find satisfaction in fraternal encounters, in service, in developing their gifts, in music and art, in contact with nature, in prayer. Happiness means knowing how to limit some needs which only diminish us, and being open to the many different possibilities which life can offer."*

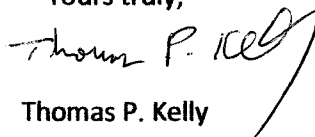
#### **Summary**

In summary we hope you will advise the Department to discard the suggested draft policy. Instead we urge you to advocate for a policy based on the essential functions natural areas provide and designed to protect and preserve all areas managed as natural areas for the future. Policy should recognize the sort of tranquility needed to provide restorative personal restoration from stress among the essentials. Any checklist developed for evaluating uses should be comprehensive enough to identify threats to or conflicts with the essential functions natural areas provide. In addition the policy should require the department to periodically identify all areas managed as natural area and green belts and report acreage and condition so that changes in acreage and condition will be known by the public and elected officials.

Please think critically and be mindful and wary of the advantages the Department has over the public for shaping your opinions

Over the years we have told thousands of work party volunteers about the benefits their work on natural areas provides. It is alarming to see a draft policy proposed which would devalue the work belie the message.

Yours truly,



Thomas P. Kelly

Chair, Magnuson Environmental Stewardship Alliance.