

Comments on proposed Go Ape commercial operation in Lincoln Park, West Seattle

by Trileigh Tucker

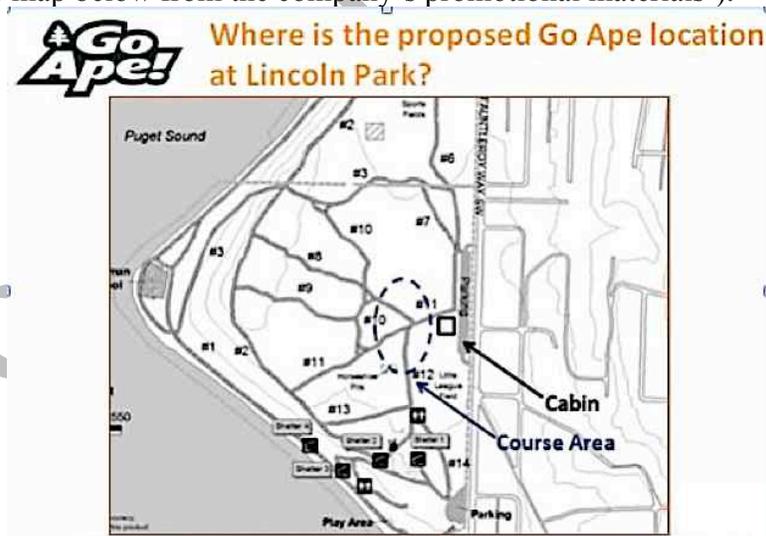
This document was originally prepared for and sent to a member of the Seattle Parks and Green Spaces Oversight Committee. Please feel free to use information and references embedded here, but please don't copy/paste or re-use any of my writing without checking with me. Thank you.

-Trileigh (email tri@seattleu.edu)

Dear :

I'm writing to follow up on our recent conversation in which I mentioned a disturbing proposal by Seattle Parks and Recreation (SPR) to establish a for-profit, commercial ropes course operation in the canopy of Lincoln Park in West Seattle.

The proposal would involve contracting with Go Ape, a UK company, to establish and operate a series of ropes, platforms, webbing, and ziplines over 6-10 acres in one of Lincoln Park's densely forested areas (see map below from the company's promotional materials¹).



According to Go Ape's promotional materials, they would allow 28 people per hour to be added into the canopy each weekend day (14 per hour on weekdays), which represents an approximate

¹ <http://westseattleblog.com/2012/07/treetop-ziplining-at-lincoln-park-parks-superintendents-reply>

maximum of 800 people on a single weekend day. Over a week, usage could be as high as 3700 people, translating to 44,400 people in a 12-week summer season (with additional people during shoulder seasons). Judging from videos and commentary posted online, the experience is associated with constant shouting and screaming.

I find this prospect, and the manner in which public involvement has been handled to date by Seattle Parks and Recreation, objectionable from several angles: public process, apparent violations of existing SPR policies and guidelines, effects on wildlife, effects on people, and justice/values priorities.

1. Public involvement process

According to a GO Ape project summary obtained by the West Seattle Blog (WSB), “[o]n August 12, 2011, Seattle Parks selected Go Ape as part of their Expression of Interest selection process for the development and operation of a treetop adventure course in its park system.”² There has been not only no public notification that such an operation was being considered, but no information available online anywhere to the public. I searched City records for independent confirmation that this selection had happened, but could find none. Furthermore, Tracy Record, West Seattle Blog editor, upon being notified of the project by a reader, searched extensively through public records and was not able to find any mention whatsoever of either the Go Ape proposal or the associated decision.

The Go Ape proposal finally came to light when Charles Ng, director of the Parks Partnership Program, recently contacted Sharon Baker, park steward and head of the Friends of Lincoln Park, to ask whether the city could give a presentation to the group. The Morgan Community Association was apparently contacted in March 2012, but could not schedule a meeting until July 18, 2012. No other community outreach was made in the 11 months since Parks apparently approved the proposal.

The lack of public outreach for almost a year appears to violate the following elements of Seattle Parks' official Public Involvement Policy³, which was amended in 2006 in response to a City audit stemming from past problems with public involvement⁴:

- To invite and encourage direct public involvement in its planning efforts and in the review of its funded capital projects and any proposal that would, in the judgment of the Superintendent, substantially modify the property's use or appearance.
- To provide early and thorough notification of proposals and projects, through a variety of means, to users, user groups, neighborhoods, neighborhood groups, and other interested people.
- When possible, to invite the community's ideas, e.g., for a park design or a site for a new activity, rather than to present a list of options or a proposed design.

² <http://westseattleblog.com/blog/wp-content/uploads/2012/06/projectssummary.pdf>

³ <http://www.seattle.gov/parks/Publications/Policy/PIP.pdf>

⁴ Part 2: <http://www.seattle.gov/audit/docs/ParksPhase2041207.pdf>

I am disappointed in my city; I thought we had been on the road to improvement in the public involvement process.

2. Violation of SPR's existing guidelines and policies

Secondly, it seems clear to me that the Go Ape proposal represents a violation of the Use Management Guidelines for Seattle parks in general and of the Supplemental Use Management Guidelines for Lincoln Park⁵ in particular. From SPR's Use Management Guidelines, I note the following official policies that seem to have been violated or are likely to be violated by the Go Ape proposal:

- 4.1.2 To assure in every possible way that recreation activities and special events have a minimum adverse impact upon the parks and surrounding environment.
- 4.1.8 To obtain the input of those communities which adjoin and surround the parks, in making use management decisions relating to those parks.
- 4.3.2 The Department will discourage noisy or otherwise offensive activities which could significantly disturb the recreational enjoyment or threaten the health and safety of other park users.

Adverse impacts on the park and its surrounding environment seem inevitable should this proposal be approved, for reasons outlined in detail below, violating policy 4.1.2. Policy 4.1.8 has been violated through the lack of any communication with the public for almost a year after the Go Ape proposal was presumably approved. And it should be clear even on a cursory examination of Go Ape course design that this would be an extremely noisy activity whose influence would constitute long-term damage to the Lincoln Park soundscape and the tranquility that is so desired by many park users.

The Supplemental Use Management Guidelines for Lincoln Park⁶ include these restrictions:

- 4.1.1 Permissible normal use of Lincoln Park shall generally be limited to informal drop-in activities.
- 4.3.1 Permitted concession activity in Lincoln Park is limited to food vending.
- 4.3.2 A park use permit issued in conjunction with a special event may authorize the limited sale of food and/or non-food items by the non-commercial, non-profit event sponsor.

Since the general Use Management Guidelines state that "Concession activities not listed in the Supplemental Use Management Guidelines are prohibited at the specific park" (section 4.5.2), and clearly the Go Ape operation would not be limited to food vending, I conclude that the proposed Go Ape for-profit concession would constitute a prohibited concession, and its operation would thus be in violation of the Lincoln Park Use Management Guidelines.

3. Effects on wildlife

The City of Seattle's documents imply a city truly committed to the health of its stunning natural environment. For example, the official Seattle Parks and Recreation Urban Wildlife and Habitat Management Plan (2000) states that "[t]he Seattle Department of Parks and Recreation

⁵ <http://www.cityofseattle.net/parks/Publications/UseManagementGuidelinesLincoln.pdf>

⁶ <http://www.cityofseattle.net/parks/Publications/UseManagementGuidelinesLincoln.pdf>

(Department) is committed to providing opportunities for Seattle's populace to experience and enjoy wildlife in natural settings in Seattle. The Department is dedicated to protecting and enhancing wildlife habitats and wildlife in Seattle's parks and city-owned greenspaces. This Plan is part of the evolution of Department of Parks and Recreation efforts toward more natural and ecological resource management of parks than has taken place in the past."⁷

Along these lines, SPR's Lincoln Park Vegetation Management Plan (VMP)⁸ includes the following goal and objectives for wildlife habitat (p. 2):

“Goal: Protect and enhance wildlife habitat.

Objectives:

- . Increase extent and diversity of native species in park, and improve vegetation structure for wildlife.
- . Create habitat features where feasible: tree snags, brush piles, downed woody debris, water sources.
- . Expand habitat by linking forested patches and reducing fragmentation caused by informal paths,
- . Encourage users to observe, document and foster abundant park wildlife.”

Seattle also appears to value respectful interactions between its human residents and their protected natural areas, and to want to move even further in that noteworthy direction. The official Seattle Parks and Recreation Urban Wildlife and Habitat Management Plan (2000) states that “[t]he Seattle Department of Parks and Recreation (Department) is committed to providing opportunities for Seattle's populace to experience and enjoy wildlife in natural settings in Seattle. The Department is dedicated to protecting and enhancing wildlife habitats and wildlife in Seattle's parks and city-owned greenspaces. This Plan is part of the evolution of Department of Parks and Recreation efforts toward more natural and ecological resource management of parks than has taken place in the past.”⁹

Yet the proposed Go Ape commercial adventure operation violates the City's stated policies in each of these three documents. As a naturalist, photographer, and Associate Professor of Environmental Studies at Seattle University, I have spent countless hours studying Lincoln Park's wildlife. I can provide photo documentation of nesting Bald Eagles, Barred Owls, Cooper's Hawks, and Pileated Woodpeckers, among many smaller species. Bald Eagles are a Washington State Sensitive Species¹⁰. Both Pileated Woodpeckers and Band-tailed Pigeons, which also occur in Lincoln Park, are listed among the Washington Department of Fish and Wildlife's Priority Species¹¹, entitled to special habitat protection.

“Forested natural area” constitutes 64% of Lincoln Park's 135 acres¹², thus occupying approximately 86 acres. Of the forested natural area, the central flat area of the park, including Zones H and I as described in the VMP, includes 35.6 acres according to the VMP (p. 3-8). Go

⁷ <http://www.seattle.gov/parks/publications/UrbanWildlifeandHabitatMngtPlan2000.pdf>, p. 6.

⁸ <http://www.seattle.gov/parks/Horticulture/VMP/LincolnPark/VMP.pdf>

⁹ <http://www.seattle.gov/parks/publications/UrbanWildlifeandHabitatMngtPlan2000.pdf>, p. 6.

¹⁰ http://wdfw.wa.gov/conservation/bald_eagle/

¹¹ <http://wdfw.wa.gov/publications/00165/wdfw00165.pdf>

¹² <http://www.seattle.gov/parks/Horticulture/VMP/LincolnPark/VMP.pdf>, Overview, p. 2.

Ape proposes to destroy habitat in up to 10 acres of this central flat section of forested natural area: *more than a full quarter of the contiguous natural area that includes documented nests of protected Cooper's Hawks, Barred Owls, and Pileated Woodpeckers, and Bald Eagles, among many smaller species.* This 28% figure does not include the much more broadly spread auditory disturbance from screaming, yelling children and adults.

During the sensitive nesting season—the primary season for use of the proposed commercial adventure course—parent birds rely on being able to travel and hunt safely in this central forested area to feed themselves and their young. Once the young fledge, they rely heavily on this same area for developing flight and predation skills. The damage that would be done to this critical habitat by Go Ape would represent a significant cost to avian species. There is no question that their nesting success would be significantly degraded by the establishment of an commercial adventure operation that entailed presence, rapid movement, and loud sounds of more than 3,000 people per week in the canopy during the vulnerable spring and summer months.

Many other species besides these large, notable birds inhabit the threatened section of Lincoln Park. I am attaching a list of the 75 bird species that I have personally observed in the park, and there are undoubtedly many additional species noted by others.

In its initial description of wildlife ecology, the Lincoln Park VMP notes (p. 10) that “[b]ird species diversity in wooded habitats increases with increasing structural habitat diversity. Habitats with more canopy layers, greater foliage volume, and great total percent vegetative cover support greater bird diversity than habitats with fewer layers, less foliage volume, and less vegetative cover.” Removal of trees by Go Ape, especially the young and dead trees that Go Ape claims would be their priority, in this highly complex area of Lincoln Park would clearly, then, have a negative effect on diversity of bird species and would violate the park’s expressed commitment to “protecting and enhancing wildlife habitats and wildlife.”

Allowing a for-profit, commercial company to install such a wildlife-unfriendly operation in Lincoln Park clearly violates SPR’s stated objectives to

- “Increase extent and diversity of native species in park, and improve vegetation structure for wildlife,
- Create habitat features where feasible: tree snags, brush piles, downed woody debris, water sources,
- Expand habitat by linking forested patches and reducing fragmentation caused by informal paths.”

SPR’s Urban Wildlife and Management Plan also emphasizes the importance of habitat corridors in “maintaining viable wildlife populations” (p. 11). Since the proposed Go Ape area is in the central part of the forested park, the inevitable destruction of over 25% of this area as a corridor would constitute significant fragmentation of continuous habitat, to the detriment of most wildlife in that area.

Although Go Ape’s promotional materials proclaim the company’s environmental sensitivity, and many healthy trees may indeed be maintained, birds and other wildlife simply cannot

thrive—or, for many, simply survive—in a setting that could be host to over 3500 people a week swinging loudly through the canopy.

4. Effects on humans

As you know, in my role as professor, I teach Natural History, Ecopsychology, and Environmental Justice. I have also published on the value of contemplative engagement with the natural world. I am therefore in a good position to evaluate the psychological and other effects of changing a quiet public urban forest setting to a loud, commercial, expensive "Tarzan Theme Park" (as another concerned citizen calls this operation).

Particularly in an urban setting, it is often difficult for citizens to find quiet space that can be critical for emotional health. Time in nature has been shown to be associated with happiness, stress reduction, and decreased violence. The importance of quiet urban nature for stress reduction and emotional and physical well-being has been well demonstrated¹³. Urban noise has been demonstrated widely to cause physiological and cognitive problems, sleep disorders, and emotional stresses; access to quiet green space provides respite from urban noise, and has been shown to “effectively balance out the negative health effects of noise exposure”¹⁴. Gidlöf-Gunnarsson and others, the authors of this study, go on to report that “[o]pportunities to experience quietness – or more accurate – to experience freedom from unwanted sounds and a natural soundscape has shown to play an important role in recreation experiences”^{ibid}.

The 6-10 acres under consideration are in the central part of the park (see map above). Noise from the proposed commercial activity would thus permeate much of the park and would likely be easily audible to neighbors across Fauntleroy Way. The quiet trails treasured by those I encounter in the park every day—elders, children, people for whom English is not a native language, teenagers, adults—would become yet another place where nonstop noise disrupts the solace of nature.

A survey conducted as part of the City of Seattle’s 2006 audit of Parks and Recreation’s public involvement found that the top two ways in which citizens use Seattle parks are (1) nature walks/hiking; (2) passive enjoyment/picnics.¹⁵ Although the proposed adventure business doesn’t fall easily into any of the surveyed categories, the closest one I could find, organized sports, was named by less than two-fifths as many people who chose these top two passive, quiet activities—which would be disrupted by the advent of the Go Ape commercial operation.

¹³ For example, van den Berg, Agnes E, Terry Hartig, and Henk Staats. 2007. Preference for Nature in Urbanized Societies: Stress, Restoration, and the Pursuit of Sustainability. *Journal of Social Issues*, Vol. 63, No. 1, 2007, pp. 79-96; Maas, J., Verheij, R. A., Groenewegen, P. P., de Vries, S., & Spreeuwenberg, P. (2006). Green space, urbanity, and health: How strong is the relation? *Journal of Epidemiology and Community Health*, 60, 587–592; references therein; and many others available on request.

¹⁴ <http://www.sciencetime.org/ConstructedClimates/wp-content/uploads/2010/08/GidlofgunnarssonOhrstrom2007.pdf>, p. 123; also see multiple references therein.

¹⁵ <http://www.seattle.gov/audit/docs/ParksPublicInvolvementFinal2.pdf>, p. 21.

Changing Lincoln Park's soundscape in such a fundamental, negative, long-term way would represent a serious detriment to both human and natural park neighbors.

5. Justice and values concerns

Thanks to protection by the City of Seattle, the emotional and even spiritual benefits associated with time in quiet forests filled with birds and other animals are currently available free of charge in Lincoln Park to people of all ages, backgrounds, and incomes.

Should the Go Ape proposal be approved, the company, according to its promotional materials, would charge \$55 admission for adults and \$35 for children. Children under 18 must be accompanied by an adult; children under 10 are not allowed. Therefore, a family of four would pay \$180 for 2-3 hours of entertainment. This seems clearly a luxury that would be available primarily to families with substantial disposable income. Furthermore, the course would not be usable by many elderly people, by adults with any of a number of physical limitations, or by young children.

To me, destroying the opportunity for free, quiet, frequent time in nature that is currently available to citizens of all ages, incomes, and physical abilities, in order to substitute an expensive form of entertainment for higher-income people to occasionally enjoy, represents a violation of environmental justice. Below is the EPA's definition of environmental justice¹⁶:

Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. It will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.¹⁷

What is meant by fair treatment and meaningful involvement?

- **Fair treatment** means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies
- **Meaningful Involvement** means that:
 1. people have an opportunity to participate in decisions about activities that may affect their environment and/or health;
 2. the public's contribution can influence the regulatory agency's decision;
 3. their concerns will be considered in the decision making process; and
 4. the decision makers seek out and facilitate the involvement of those potentially affected

In my view, there has been *no* meaningful involvement to date of those most affected by this proposal that affects their environmental health. Furthermore, in an email on July 5 to "Community Members," Christopher Williams, Acting Superintendent of Seattle Parks and Recreation, stated that "A public meeting will be scheduled in early to mid-August to inform

¹⁶ <http://www.epa.gov/environmentaljustice/basics/index.html>

¹⁷ <http://www.epa.gov/environmentaljustice/>

interested residents of findings, answer questions, and address any concerns.”¹⁸ Nowhere in his letter does he mention any opportunity for public *input*.

In terms of the “negative environmental consequences” included in the EPA definitions, disproportionate lack of access to environmental benefits such as green space has in recent years gained increasing attention as an environmental injustice.¹⁹ This expanded focus has been termed the “second wave” of environmental justice, defined as “dedicated to urban design, public health, and access to and quality of outdoor recreation (e.g., parks).”²⁰ A study by Maas and others (2006)²¹ showed that all urban subpopulations experience a strong relationship between accessible green space and health. However, the study also indicated that two of the subgroups who experience the *greatest* health benefits from urban green space—the elderly and those of lower socioeconomic status—are those who would be preferentially *excluded* from the Go Ape facility.

The State of Washington adds this characterization of environmental justice: “Environmental justice is the right to a safe, healthy, productive, and sustainable environment, where environment is considered in its totality to include the ecological, physical, social, political, aesthetic, and economic environment,” noting that “[e]vidence suggests that the risks and benefits associated with economic progress and changes in land use are not equitably distributed among the total population.”²² It seems clear that the benefits of the proposed land-use change requested by Go Ape are disproportionately limited to those with higher income, whereas the negative effects of both greatly increased noise and greatly decreased wildlife, along with restrictions on access to a significant part of a publicly-owned park, fall on all users.

I am deeply concerned about commercialization of my park—and by extension, all Seattle parks—at all, but especially with so little public benefit.

Final thoughts

Outcry in West Seattle against the Go Ape proposal has been immense: 532 comments combined in response to the West Seattle Blog’s three articles and a forum discussion, with very few voices expressing approval. The park is considered a regional gem for its natural beauty and its wildlife. It is my hope that those with the responsibility to preserve and protect Lincoln Park—the Parks Oversight committee and the Parks and Neighborhoods Committee of the Seattle City Council—will realize the potential tragedy of destroying this remarkable amenity for short-term monetary gain.

¹⁸ <http://westseattleblog.com/2012/07/treetop-ziplining-at-lincoln-park-parks-superintendents-reply>

¹⁹ For instance, Floyd MF, Johnson CY. Coming to terms with environmental justice in outdoor recreation: A conceptual discussion with research implications. *Leisure Sciences*. 2002;24:59-77.

²⁰ <http://www.aacorn.org/uploads/files/EnvironmentalJustice.pdf>, p. S53.

²¹ Maas, J., Verheij, R. A., Groenewegen, P. P., de Vries, S., & Spreeuwenberg, P. (2006). Green space, urbanity, and health: How strong is the relation? *Journal of Epidemiology and Community Health*, 60, 587–59.

²² https://fortress.wa.gov/doh/wtn/WTNPortal/EPH/EJ_LandingPage.aspx

Although the natural world has only our human voices to plead for it, I hope that our citizen-representatives on these committees will see the inherent value of the quiet green beauty that is always so fragile in the face of human “development” forces represented by noise and money. Please let me know what else I can do to keep Lincoln Park as natural as can be.

I will continue to study this issue and would be happy to share further research results. Thanks in advance for considering this extended comment, and let me know what you think.

Sincerely,

A handwritten signature in cursive script that reads "Trileigh Tucker". The signature is written in a dark ink and is positioned above the typed name.

Trileigh Tucker

Do not reproduce