

9/26/2023

Attention Parks' representatives:

I am requesting the city provide further information regarding the proposed pickleball courts in Lincoln Park, and to open an official public comment period as required by Parks' **Public Involvement Policy**.

The information I am requesting is as follows:

1. What is the current status of SPR's proposal for pickleball courts in Lincoln Park?
2. Where is the city's site plan?
3. Was any environmental review done? I don't see any. If so, why not?
4. When will the public comment period be provided?

Currently the only way folks became aware of this project was through an embedded comment in a *West Seattle Blog* post about the pickleball lines being painted at Solstice. Not providing a publicized plan/proposal/comment period reflects poorly on the city, as does the city apparently bending to a small niche voice, without input from the diverse stakeholders. It also directly violates the **Public Involvement Policy for Parks Planning Processes and for Proposals to Acquire Property, Initiate Funded Capital Projects, or Make Changes to a Park or Facility***.

[*https://www.seattle.gov/Documents/Departments/ParksAndRecreation/PoliciesPlanning/PublicInvolvementPolicy.pdf#:~:text=This%20policy%20describes%20the%20role%20of%20park%20users,needed%20projects%20for%20which%20Parks%20applies%20for%20funding.](https://www.seattle.gov/Documents/Departments/ParksAndRecreation/PoliciesPlanning/PublicInvolvementPolicy.pdf#:~:text=This%20policy%20describes%20the%20role%20of%20park%20users,needed%20projects%20for%20which%20Parks%20applies%20for%20funding.)

Additionally, this plan also violates the **Use Management Guidelines for Seattle Parks***.

[*https://www.seattle.gov/documents/Departments/ParksAndRecreation/BriefingPapers/NA%20GB%20Supplemental%20Use%20Guidelines%20REVISED%207-20-15.pdf](https://www.seattle.gov/documents/Departments/ParksAndRecreation/BriefingPapers/NA%20GB%20Supplemental%20Use%20Guidelines%20REVISED%207-20-15.pdf)

It also appears that no environmental review was conducted. I am requesting that be done as well. Seeing that there was no review done, and no public comment solicited, it needs to be clearly stated that:

Lincoln Park needs to remain as natural as possible. The park currently co-exists nicely as a greenspace with picnic areas, playgrounds, sports fields, two pools, outer walking paths and quieter inner [unmaintained] paths. The outline below demonstrates rationale for obtaining harmonious balance between recreation, habitat, and the human and wildlife interface. I can provide documentation with records, photographs and data from official surveys and studies. This area of the park:

- 1) Is a nesting hot-spot for many raptors; barred and screech owls, Cooper's hawks and ravens. The long-term resident eagles' nest is just down the way
- 2) Is a hunting and occupancy area for barred, great horned and screech owls, peregrine falcons, Cooper's hawks, eagles, merlins, and ravens
- 3) Is a fledgling dispersal and 'nursery' area for raptors
- 4) Retains long grassy areas around groves that are nesting areas for songbirds, especially ground nesters like Juncos. The open meadow also hosts prey species for raptors
- 5) Hosts many migratory birds which rely on dark skies to travel and rest during stop-overs. Some species like the *Varied thrush*, over-winter in the park
- 6) Is a tranquil open-meadow setting with beech, redwood and evergreen groves on either sides; the meadow is used in the summer for picnics, naps, and hammocks are hung in the beech trees
- 7) Is an area where the Critically endangered Southern Resident killer whales, and Transient killer whales swim by under the bluffs, and can be heard breathing from the park. Imagine straining to hear them over the noise this proposed court will induce

8) The proposed site, as well the proposed OLA site are within a ***Priority Habitat Species Area***. They are both also within, and border an ***Environmentally Critical Area****

*https://your.kingcounty.gov/dnrp/library/wastewater/wtd/construction/CSOBeach/TechDocs/FacilityPlans/WS/Draft/Ch03_WS.pdf

Lincoln Park is a unique and very large (one of Seattle's last remaining) green spaces that provides a home for many species of wildlife, including many nocturnal species. Light and ***sustained, repetitive*** noise will disrupt this well-established ecosystem function by marginalizing wildlife and pushing them further out to areas that don't have as much available prey, as well as pushing prey species out. Some predators also take an unfair advantage of night lighting. Raptors being pushed out of hunting areas in the park will rely more on the edges and neighborhoods which are full of rodenticides. Rodenticides sicken and kill raptors, coyotes and many other urban wildlife species, as well as [domestic] pets.

People come to Lincoln Park for many reasons. Many enjoy nature, wildlife and the peaceful experience it provides. Pickleball courts would subject park-goers to the constant, thwacking noise which will carry a far distance through the park. This is not welcome; many people go to natural areas, parks and greenspaces to get away from the constant lights and noises of the city. For many, it is a matter of their mental health. It is a mistake to think of incorporating this type of disruption and marginalization into Lincoln Park. Many studies have proven the toxic effects of noise and light on humans' mental and physical health.

In May 2017, Seattle became part of the *Urban Bird Treaty City*, and Lincoln Park was chosen to host the event. The park was chosen because it boasts much biodiversity in its urban greenspace. The treaty has three goals:

****Protect, restore, and enhance urban/suburban habitats for birds.***

****Reduce urban/suburban hazards to birds.***

****Educate and engage urban/suburban citizens in caring about and conserving birds and their habitats.***

The treaty was signed by representatives from US Fish and Wildlife, and Seattle Parks. We need to honor this treaty signing and what was promised to the city and its wildlife. Allowing pickleball courts at Lincoln Park is in *direct conflict* with the City's promise when signing the treaty. Also, *Birds Connect Seattle's* (formerly Seattle Audubon) Neighborhood Bird Project survey GPS survey square #4 shares this proposed area. I lead these surveys once a month and have collected 6 years of data at this spot.

There are already shared [tennis/pickleball] courts at High Point, along 34th Ave at the community center. There are several other appropriate places around West Seattle that could accommodate this type of recreation. Two, of many examples I can provide: SWAC (Southwest Athletic Complex) has much available unused parking surface, is already a recreation area and lighted. The Westwood Village shopping area parking lot, south of the Post Office is also unused, well lit and has a new play area there. It is also my understanding that the city was planning to construct dedicated courts at Hiawatha. What has become of that plan? Pickleball courts are loud with ***sustained and repetitive*** noise. I recently measured decibel levels at the Highpoint courts and at times the level was over 80. They are also extremely bright. It is well proven that light pollution is detrimental to wildlife as well as public health.

To reiterate, this is a poor plan.

The city's decision to forgo its legal responsibilities and due process, alienates the public and silences stakeholders who have a vested and legitimate interest in how the park is managed and protected. Not allowing for or

conducting an EIS is negligent and at odds with the policies stated above.

As time is of essence, and this is my third inquiry, I request a prompt response to the questions above and an explanation of why the general public has not been allowed to participate in this process. There are many folks/groups/orgs behind this opposition, and they too are anticipating a response soon.

If it would be helpful, I would like to invite any Parks' representatives to meet with me and discuss why a new sports court must not be allowed to be built; perhaps an educational walk through the park would be a great start?
Thank you,

Kersti E. Muul

*Urban Conservation Specialist, Wildlife Biologist, and Urban Wildlife
First Responder*