



City of Seattle
Seattle Parks and Recreation

December 9, 2011

City of Seattle, DPD
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Re: 2nd Draft of the Shoreline Master Program Regulations

Seattle Parks & Recreation (Parks) appreciates the opportunity to provide comments on the 2nd Draft of the Shoreline Master Program Regulations. Overall, the 2nd draft has captured the bulk of Parks' previous concerns and will be a good foundation with which the City can regulate the uses of the City's shorelines in a manner that provides public access, promotes preservation and restoration and facilitates responsible development. Parks has the following specific comments related to the proposed shoreline environment changes associated with Warren G. Magnuson ("Magnuson") Park and the Sand Point peninsula:

1. CM Zone around motorized boat launch. The 2nd draft proposes changing the existing CM zone around the motorized boat launch at Magnuson Park to CR. Auto trailered boat launches are an allowed use in the CM zone but a conditional use in the CR zone. Other motorized (auto trailered) boat launches and moorages in the City remain in the CM zone or more intensive Urban shoreline environments. The CM zone should be retained around the motorized boat launch at Magnuson Park to better allow for ongoing maintenance and any necessary improvements.
2. Magnuson Park Wetlands. The shoreline jurisdiction is proposed to be extended to the interior of the park to include the wetlands, both natural and created, and include this area within the CP shoreline designation. The apparent basis for this inclusion is the following provision of Washington State Law: "[a]ll wetlands and river deltas associated with the streams, lakes, and tidal waters which are subject to the provisions of this chapter." (RCW 90.58.030). This is a significant issue for Parks as the area in question includes not only natural and created wetlands but trails, asphalt pathways, tennis courts, a large dog off-leash area with shoreline access, natural grass sports fields and

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sports field with artificial turf which are lit for night time play. Many of these uses would not be consistent with the proposed CP shoreline designation.

The wetlands in question are not “associated” with the nearby Lake Washington. The following explanation is a synthesis of existing environmental documents associated with the redevelopment of former Naval Air Station Seattle into Magnuson Park. Complete copies of the documents are attached hereto.

The lands within Magnuson Park have gone through significant change over the last 85+ years. In addition to the lowering of Lake Washington by ten (10) feet with the construction of the Hiram Chittenden locks in 1916, the entire peninsula was completely graded and filled to create a Naval Air Station in the 1930s and 1940s (Figure 1). The Naval Air Station operated as a military airport for approximately 40 years until it was decommissioned in 1970. An initial deed transfer of 196 acres to the City of Seattle occurred in 1975, and included the most of the lands recently reconstructed as wetlands and/or athletic fields. In 1999 an additional 126 acres were transferred to the City of Seattle and the University of Washington (Figure 2).

Since 1975 various reuse plans were developed for the park and the Sand Point Historic District. The most recent plans for the park date from 1999, 2004 and 2006. The Amended Wetland Habitat Complex and Athletic Fields Complex Master Plan (Ord 122318, 2006) is shown in Figure 3. A key concept of this plan is the synergy between the athletic fields drainage system and year-round water flows into the reconstructed wetlands. A second key concept is the system of pedestrian trails/paths surrounding a large habitat area and passing through areas of reconstructed wetlands. This circulation element reflects prior planning efforts. Application of the proposed CP shoreline environment to the interior wetlands would effectively restrict use on portions of existing artificial turf athletic fields.

Decommissioning of the Naval Air Station resulted in the deconstruction of nearly all the landing strips, taxiways and internal road system of the airport. Deconstruction methods varied. Final stages of the demolition of the runways included excavation of shallow ditches across the site to attempt to facilitate drainage of surface waters towards the lake (due to the extremely flat conditions resulting from the construction of the airport). In the mid-1970s, when the City first acquired the site, the Sports Meadow (natural grass) fields were constructed. The fields were designed and constructed with a buried stormwater collection system to drain the fields of precipitation, and directed the collected water into two created ditches located west and east of the Sports Meadow. (Wetland Delineation Report, p. 6)

The existing soils within the interior portions of the park are not parent material but are modified materials resulting from grading, filling, construction and demolition activities occurring on the Sand Point peninsula since the early 1900s. Field investigations for wetlands work determined that existing soils, in all portions of the project site

examined, were comprised of fill material. Anecdotal information from Magnuson Park staff indicates that the former bluff at Sand Point Head and the northern portions of Promontory Point were cut and graded to provide the fill material used to eliminate Mud Lake and the wetlands, fill lake bays and expand the shoreline of the original peninsula. Field sampling has shown soils to be variable, but consistently concretious in nature. Soil types encountered in sampling include cobble, gravely sands, sandy gravely cobble, and gravely silts. Almost all soils on the site have a very low permeability (as evidenced by extensive surface ponding and no infiltration below the top 4 inches, even after heavy storm events). Most soils currently reflect hydric conditions of low chroma and the presence of redoximorphic features (mottles) within the top 10 inches (FEIS p 3-15). Earthwork to create the runways and then to deconstruct them after decommissioning has left the the soils in the park severely impacted. The soils are so compacted that soil data pits had to be excavated with a motorized soil auger. (Magnuson Park Wetland Delineation Report, p. 6; attached hereto)

The hydrology of the site is driven by precipitation. Flat gradients, shallow ditches with little gradient, and impermeable soils create the opportunity for precipitation to stand within shallow depressions and pond for the duration of the winter (Figure 3). Because of the lack of significant soil infiltration, shallow depressions of a few inches to 18 inches in depth are typically filled with the first fall storms and remain full through early to mid-spring.

Ditches that were created after the removal of the airfields in the 1970s are present across the interior of the site. These ditches convey stormwater flows from the interior of the site to Lake Washington via a series of culverts under the road system of the park. After mid-spring, the ditches typically remain dry until the fall rains return. (FEIS p. 3-15)

The existing storm drainage systems on the site have deteriorated over time and in several areas appear to no longer be functioning as designed or constructed. The storm drains convey both on and off-site stormwater runoff through the park. Storm drains vary in size from 4-inch pipe for subdrainage systems to 30-inch pipe for major site trunk lines. A number of existing storm drain interceptor lines cross through portions of the 153-acre site (wetlands and athletic fields project site), as do two storm drain trunk lines. Stormwater from the park discharges to Lake Washington at approximately seven locations along the shoreline of the peninsula. Most of these locations are elsewhere on the peninsula, such as at Pontiac Bay near the northwestern corner of the park, although three drain lines appear to discharge to the lake near the beach area along the easterly shoreline. The existing sports fields' subdrainage system now appears to be inoperable because the fields are saturated much of the time. (FEIS pp. 3-8 – 3-9)

There is an additional source of off-site water supply to the project site. The United States Geological Survey (USGS) Western Fisheries Research Center south of NE 65th Street supplies "clean" water to the project site on a continuous basis. As part of the fish research operation, the USGS pumps water from Lake Washington to the facility,

circulates the water through on-site systems, and then releases water at 0.9 cubic feet per second (cfs) to the project site through a discharge pipe. The 0.9 cfs discharge rate represents a monthly runoff volume of 53.5 acre feet. This water supply is continuous and is expected to be maintained as long as the USGS facility is in operation. (FEIS p. 3-9)

The newly created wetlands (2009) that are part of the larger Magnuson Park development receive water from three sources; precipitation; stormwater runoff from sports fields and roadways, and the USGS facility. The water moves through the wetlands and is collected at the east end of the wetland complex via a constructed outlet which connects to the 30-inch storm drain pipe for discharge out to Lake Washington. While the wetlands in existing conditions provide an excellent opportunity for water quality improvement due to the dense persistent grasses that dominate, there is little to no opportunity for groundwater recharge due to the underlying soil compaction. As such, both the created and natural wetlands are not hydrologically connected to Lake Washington. The wetlands in question are not “associated” with the nearby Lake Washington and thus should not be included in the CP shoreline zone.

Thank you for your consideration of these comments. If you have any questions regarding these comments, please contact me at 206.684.7048 or david.graves@seattle.gov.

Regards,



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cc.: Christopher Williams, Acting Superintendent
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Figure 1 – NAS Seattle View to North, 1941

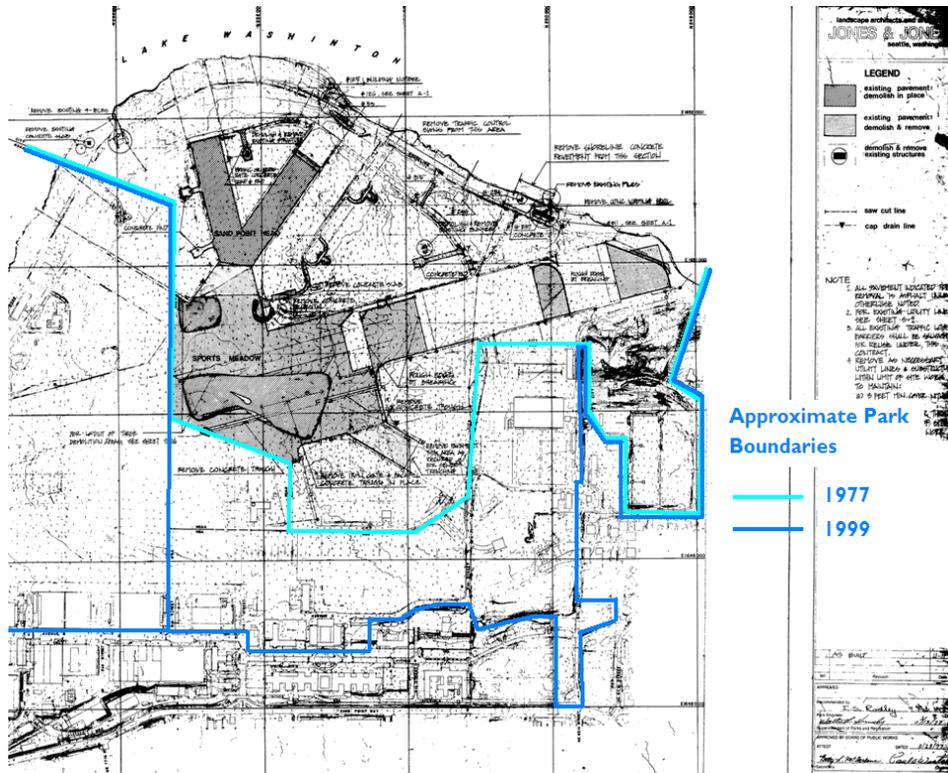


Figure 2 – Demolition Plan Sand Point Park, 1977

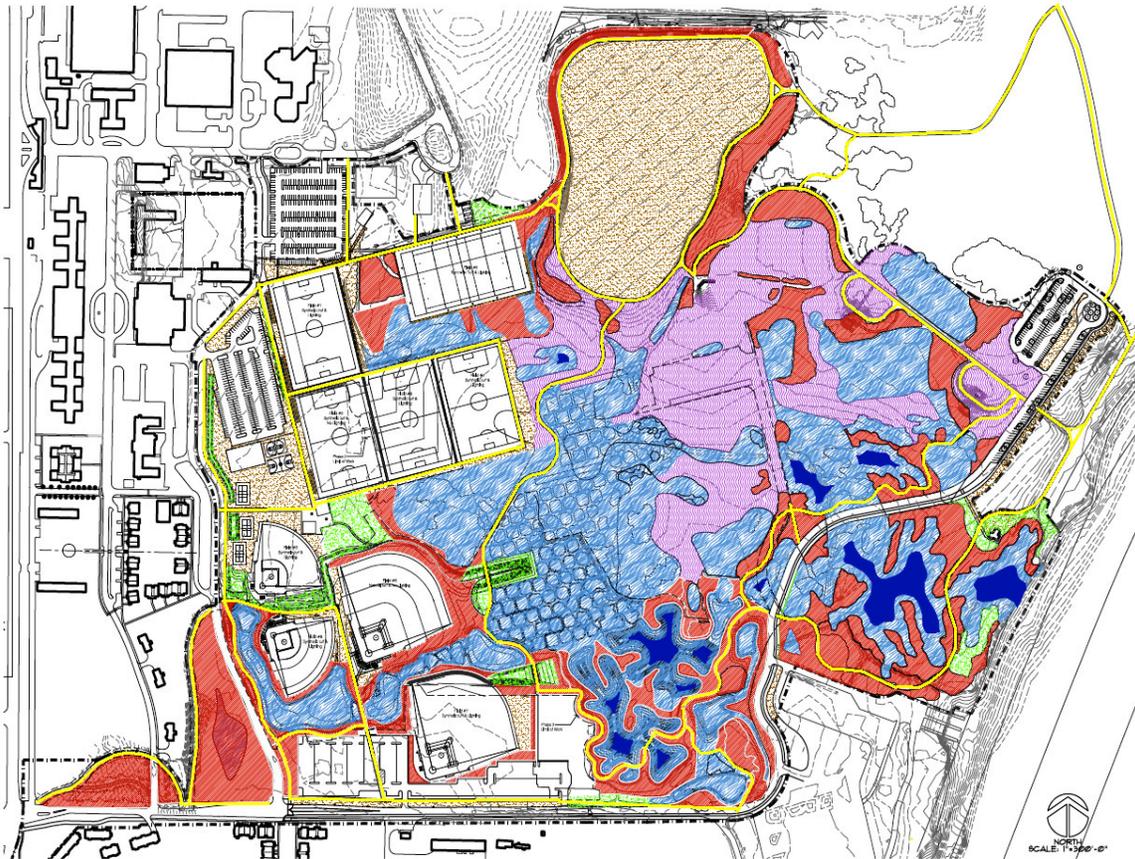


Figure 3 – Amended Wetland Habitat Complex and Athletic Fields Complex Master Plan (Ord 122318, 2006)



Figure 4 – Warren G. Magnuson Park View to West, 1981-82. Note standing water area located in center of site and west of original main runway.

References

Magnuson Park Wetland Delineation Report, Sheldon & Associates, Inc. August 16, 2005.

Link: <http://www.seattle.gov/parks/ProParks/projects/MagnusonWetlandReport8-16-05.pdf>

Sand Point Magnuson Park Final Environmental Impact Statement, July 2002

Link: <http://www.cityofseattle.net/parks/magnuson/EIS.htm>

Conceptual Wetland Compensation Plan for Magnuson Park Phase 2 Development, Sheldon & Associates, Inc., January 27, 2006.

Link: <http://www.seattle.gov/parks/ProParks/projects/Magnuson2007FinalCompensation.pdf>

Stormwater Technical Information, Magnusson Klemencic Associates, March 16, 2007.

Link: <http://www.seattle.gov/parks/ProParks/projects/MagnusonStormwater.pdf>