



November 24, 2024

Rhys Harrington
Senior Capital Project Coordinator
Planning and Capital Development Branch
City of Seattle, Seattle Parks and Recreation
100 Dexter Avenue North
Seattle, WA, 98109

Dear Mr. Harrington,

This letter is being submitted on behalf of The Cultural Landscape Foundation (TCLF) to request clarification, transparency of process, and a better understanding of the role and scope of consulting parties in reviewing the current Freeway Park Improvements project which, we only recently learned, is rapidly approaching the 90% design development stage.

The following chronicles and memorializes the involvement of TCLF and other consulting parties to the present day:

TCLF has been involved with Freeway Park, a masterwork by landscape architect Lawrence Halprin, for more than two decades; just in the past decade that has included as a consulting party to a Section 106 review process (per a [programmatic agreement in 2018](#)), as a supporter of the site's listing in the National Register of Historic Places (2019), and designation as a Seattle City Landmark (2022), through its inclusion in the acclaimed traveling photographic and digital exhibition [The Landscape Architecture of Lawrence Halprin](#) (ongoing since 2016), multiple publications, and other advocacy initiatives.

TCLF's last engagement with Freeway Park was in **October 2019** at Seattle's Town Hall when TCLF was invited to participate in an open house hosted by the city. That engagement also included a site walk and in-office meeting with city officials and their landscape architecture consultants.

Having not heard anything in several years, I wrote to David Graves, Strategic Advisor at Seattle Parks and Recreation, on **May 23, 2024**, after I read that the city had just completed a 60% review of the project. I did not hear back from Graves until **June 25**, when we agreed to meet. In the following weeks I learned that although the State's Department of Archaeology and Historic Preservation (DAHP, the Washington SHPO) had reviewed the 60% status report in early May, other consulting parties knew little about the project's status.

That initial virtual meeting ultimately took place on **July 11**, with Graves and you, the project coordinator. Importantly, at that time no drawings were offered or provided showing the recently-completed 60% design. On **July 11** I emailed Maureen Elenga, Architectural Historian, Transportation Project Reviewer, DAHP: "I met with David and Rhys today ... As I have not seen anything in two years I was curious to see areas like Seneca Plaza." On **July 15**, I received a copy of the 62-page April 2024 "60% Construction Documents ARC Briefing" presentation from Michael Houser, State Architectural Historian, DAHP.

On September 10, I again wrote to Graves: "Following our conversation, I learned that **there was a 60% review by the State** a little while ago. In talking with others, including the SHPO, they were

surprised, based on our decade plus of involvement that we had not been asked to review or serve as an official consulting party. When I inquired with other groups that had also been previously involved they too were surprised that the 60% review documents did not seem to be posted anywhere at the city or landmarks websites.” (Emphasis added.)

Having received no acknowledgment of my email sent two weeks earlier, I wrote to Graves again on **September 25** (and cc’d DAHP, National Trust for Historic Preservation, Washington Trust for Historic Preservation, Preservation Seattle, and Docomomo) noting: “An acknowledgement/response to my email of September 10 would be appreciated.” Graves replied that day, raising questions about process and the role of consulting parties. He wrote, “My main questions are: is it customary (or required) that we brief the consulting parties at project milestones like 60%; should (or must) consulting parties be included when we brief DAHP at these project milestones? This me [sic] not being as familiar with State/Federal historic preservation processes as I am with the City’s Landmarks process. That said, we would be happy to brief you all on the 60% design proposal for Freeway Park. Let me know and we can go from there.”

A meeting was finally held on **November 1** at which all of the consulting parties were shown the November 8 & 9, 2023, presentation, and not the later, April 2024 version. It was agreed that the presentation we were given, the 60% submission, would be posted to the project’s webpage and that the group would respond in two weeks. On **November 4**, you wrote back, including [a link to the project webpage that did not include the presentation](#). Writing again on **November 9** I noted that more than a week had transpired and the presentation had yet to be posted.

Finally, five months after originally contacting Graves about the 60% design, on **November 12** you sent a link to copy of a presentation dated November 8-9, 2023. In a follow up email, I pointed out that the section of the presentation pertaining to new on-site signage was not included; you sent an **undated** five-page document with those images on **November 14** noting, “Per our meeting, **we are nearing a 90% presentation in the New Year** that will document the work that has happened since the 60% presentation. We will be sure to schedule a follow up meeting to review.” (Emphasis added.)

As of November 24, 2024, [the city’s website](#), which is noted as having been last updated on July 22, 2024, has posted neither the 37-page November 8 & 9, 2023, “Design Development Presentation, Washington State Department of Archeology and Historic Preservation (DAHP) Briefing” presentation, nor the 62-page April 2024 “60% Construction Documents ARC Briefing” presentation.

Although TCLF conveyed some initial thoughts in the November 1, 2024, 90-minute consultation meeting, TCLF and other consulting parties have not been afforded an opportunity to provide formal written feedback that might be beneficial, especially *before* proceeding to 90% documents.

As the Seattle Landmark designation notes, “Collectively, **the alterations [to Freeway Park] have had little impact on the park’s integrity**, as evidenced by the integrity of its primary character-defining features: the majority of its original footprint, only slightly altered by new construction; its water features, including the children’s wading pool and the Cascade and Canyon waterfalls; its open airy plazas bordered by trees; its location above I-5 and Hubble Pl.; its concrete structures, including comfort station, paths, benches, monoliths, and planter boxes; and the board-formed concrete finish that defines nearly every original structure in the park landscape.” (Emphasis added.)

In tandem with the memorialization above, let me add that there is much to appreciate in the work that has been done to date by the city and their consultants. However, as you heard collectively from the consulting parties during the November 1 virtual meeting, **there is strong opposition to introducing any new permanent structures** in Seneca Plaza – including a multiple bathroom/“conierge” facility and a storage facility. As the Seattle Landmark nomination notes, the Park Place Building “was already in development when the City of Seattle decided to build Freeway Park. In a cooperative agreement, the private developer agreed to site his building at the park’s northwest corner in order to preserve additional square footage for the park landscape.” In an attempt to avoid, minimize and mitigate adverse effects on the park’s spatial relationships and historic character, there is likely a better way forward.

Let’s clarify the process so we can have a shared understanding of the best way forward and the role of consulting parties. According to the [programmatic agreement of 2018](#):

The City of Seattle will follow the processes outlined in 36 CFR 800 in consultation with FHWA and SHPO, and with solicited advisory input from TCLF and other consulting parties, for any proposed project that has potential to affect Freeway Park’s character-defining features as defined in the NRHP nomination of the park as identified in IV(a) and receiving WSCC funding, Washington State Capital Budget funding, and/or federal government assistance (defined as federal funding, permit, or license). All future Freeway Park improvement projects will be completed following the *Secretary of Interior’s Standards and Guidelines for the Treatment of Historic Properties*, as well as specific guidance for parks found in the *Secretary of Interior’s Guidelines for the Treatment of Cultural Landscapes*.

In our view, the current plans are not consistent with this requirement, and the plans must be revised.

We are most grateful for the opportunity to consult on this iconic and significant Modernist design. As the current project’s proposed interpretive signage states, “Freeway Park is a groundbreaking masterpiece of landscape architecture.” Let’s honor this legacy by safeguarding its integrity and honoring its historic significance.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
President & CEO

cc: Allyson Brooks, State Historic Preservation Officer/Director
David Clarke, Federal Preservation Officer, Federal Highway Administration (FHWA)
Rachel Mangum, Assistant Director, Advisory Council on Historic Preservation
Sharon P. Love, Environmental Program Manager, FHWA, Washington Division
Eugenia Woo, Director of Preservation Services, Historic Seattle
Elizabeth (“Betsy”) Merritt, Deputy General Counsel, National Trust for Historic Preservation
Michael Houser, State Architectural Historian, DAHP
Chris Moore, Executive Director, Washington Trust for Historic Preservation
Maddie Levesque, Architectural Historian, General Compliance Reviewer, DAHP

Maureen Elenga, Architectural Historian, Transportation Project Reviewer, DAHP
David Graves, Strategic Advisor, City of Seattle, Seattle Parks and Recreation
Liz Waytkus, Executive Director, Docomomo US
Steven Koch, Koch Landscape Architecture, Halprin Landscapes Conservancy, Portland, OR
Riisa Conklin, Freeway Park Association