



December 13, 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,

Thank you for the opportunity to submit this letter on behalf of The Cultural Landscape Foundation (TCLF). As we noted in our [letter of November 24, 2024](#), “there is much to appreciate in the work that has been done to date by the city and their consultants” concerning Freeway Park. However, there are proposed interventions that would adversely affect the character-defining visual and spatial relationships, particularly at Seneca Plaza and, to a lesser extent, landscape features of this “masterpiece of landscape architecture” that is listed in the National Register of Historic Places (2019) and a Seattle City Landmark (2022).

As a reminder and as detailed in our [letter of November 24, 2024](#), 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. It was only earlier this year that we learned that the project was at the 60% review stage at which point we and other consulting parties initiated months of requests for information and meetings.

Let me first observe that the [city’s website](#) for the project, last updated in December 4, 2024, includes the [Freeway Park Improvement Project 60% Design Presentation to Washington State Department of Archaeology & Historic Preservation \(DAHP\)](#) presentation dated November 8&9, 2023, as the final document in the “Background Documents” section. Is that document supposed to be the basis for the consulting parties’ comments? Or is it the [60% Construction Documents ARC Briefing](#), principally dated April 2024, but with an twelve-page, unpaginated insertion between pages 25 and 26 dated May 2, 2024, that does not appear on the city’s website? If it’s the latter, then the more recent document should be posted for public review. In addition, please note that the pagination of the April 2024 document jumps from page one (the cover page) to page eleven. Pages two through ten are missing. Moreover, the [2018 Programmatic Agreement](#), which includes specific, primary design guideline language for “All Freeway Park future improvement projects,” is not included among the background documents.

For the purposes of this letter, TCLF’s comments concern the April 2024 60% Briefing document.

With that as an introduction, the principal concern is the adverse effects on Seneca Plaza created with the introduction of a multiple bathroom/“conciierge” structure, a storage unit, the removal of a critical tree buffer (that also helps to provide spatial enclosure), the introduction of a new seat wall, steps, and significantly expanded paved area. As we noted in our November 24 letter, the **current plans are not consistent with the requirement** stated in the [2018 programmatic agreement](#) (Section IV.b.) that: “**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** (emphasis added).” This is evident in the “Seneca Plaza Design Approach,”

which makes no mention of the critical visual and spatial relationships that contribute to the landscape's significance. Instead, the primary focus is on a collection of new insertions that fundamentally diminish the landscape's historic character. **The absence of any mention of visual and spatial relationships**, the foundational and most important criteria for analyzing and understanding a cultural landscape, **is a fundamental flaw in how the design was developed and how it is now being assessed.**

The opening to the [Guidelines for the Treatment of Cultural Landscapes](#), the document we are using to evaluate the current work, in the section titled, [Organization of the Guidelines](#) states,

“Cultural landscapes are composed of a collection of features which are organized in space. They include small-scale features such as individual fountains or statuary, as well as patterns of fields and forest which define the spatial character of the landscape. Individual features in the landscape should never be viewed in isolation, but in relationship to the landscape as a whole. . . . **Overall, it is the arrangement and the interrelationship of these character-defining features as they existed during the period of significance that is most critical to consider prior to treatment. As such, landscape features should always be assessed as they relate to the property as a whole. Thus, spatial organization and land patterns are always listed first in each section of the Guidelines** (emphasis added).”

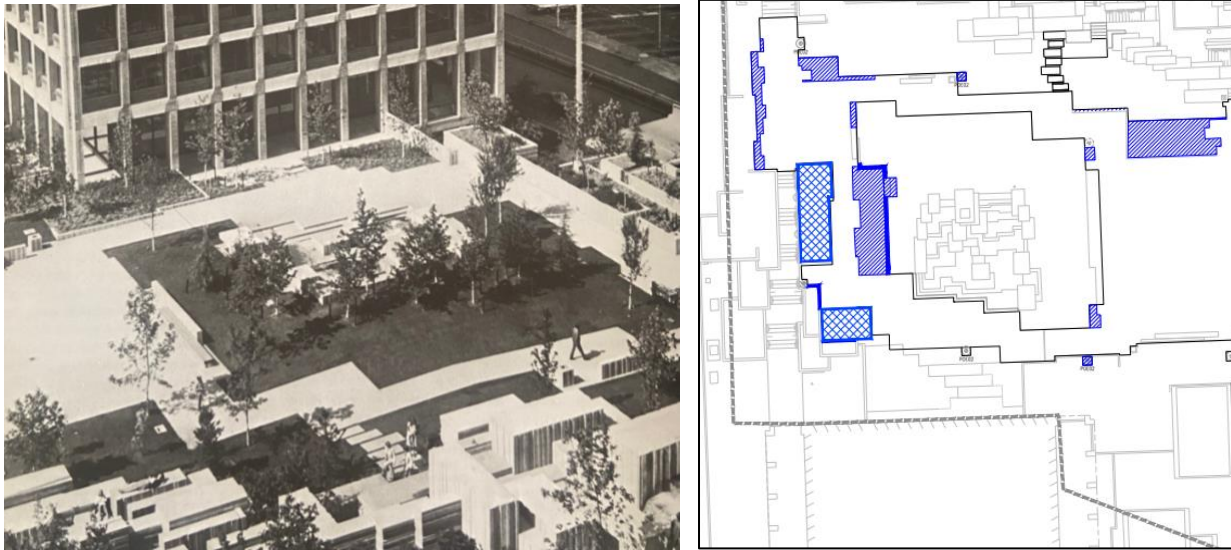
In addition, the bulleted section of the April 2024 60% review document labeled “Park Original Design Intent” makes no mention of how the park's designer, landscape architect Lawrence Halprin, approached the choreography of movement (an idea he called “Motation”). At Freeway Park, this is part of an intentional circulation design that underpins the visitor's “Feeling and Association” (two of the seven aspects of Integrity) as one moves through the park. As Halprin noted in the 2008 [Pioneers Oral History](#) produced by TCLF: “I always think of my designing as being for people who are going to be moving through space over time and then coming to some place and sitting down and then doing something else.” Instead, “Park Original Design Intent” is limited to physical features that are often being evaluated in isolation.

Indeed, we agree with the language of Steven Koch's November 28, 2024, letter to you, which states: “The proposed location of a concierge, a restroom and a storage facility within the central core destroys the original design concept of creating an enveloping nature experience. To maintain the experiential power of the entire park all such facilities should be located outside of the core area and in some cases should be moved to the edges of the park.”

Koch correctly notes that: “The introduction of restrooms, concierge, and storage facilities within the park's core at Seneca Plaza within Freeway Park at the currently proposed location is not acceptable and would have an immediate and lasting adverse effect on Halprin's design. A visual assessment of internal and external views of any facilities in the current proposed location, in any configuration, would demonstrate the destruction of the original design concept for the primary experiential core as a significant contributing area and for the park.”

Koch's letter continues: “The concierge needs to be designed for varied and occasional use, accommodating seasonal differentials, realistic occasional habitation by volunteers and sporadic fluxes of funding. Building a permanent or semi-permanent structure should be avoided as it would have an adverse effect on historically significant character-defining visual and spatial relationships noted in the Seattle and National Register designations.”

Similarly, the removal of the perimeter tree/vegetative buffer and replacement with the multiple bathroom/“conciierge” structure fundamentally alters visual and spatial relationships and removes an important design feature in the plaza. Halprin said of trees in his 2008 [oral history](#) with TCLF: “they add a sense of scale and a sense of well-being and a sense of security and on-going-ness that always helps a landscape project.” We do recognize that structural loading and safety have been identified as an issue that requires mitigation, but according to page 58 of the April 2024 document, the tree buffer removal is not related to structural loading and/or safety, but only to “change of use.” This is an adverse effect that should be avoided.



Figures 1-2: The impacts of the proposed structures and hardscape on Seneca Plaza are evident in contrasting the proposal [right] with as-built image of the original design (see *Process No 4: Lawrence Halprin*) [left]

Because of the inconsistent use of dimensions throughout the April 2024 documents, it’s difficult to thoroughly assess the impact of the proposed changes to Seneca Plaza and elsewhere. For example, the width and length of the multiple bathroom/“conciierge” structure is provided, **but not the height**. In fact, the only approximation of the massing of this significant addition is the rendering on Page 26. What is the height of these structures relative to the fountain? Similarly, a portion of the unpaved apron around the fountain is proposed to be paved and a seat wall with a “stepping platform” would be inserted. However, there’s no indication of the dimensions of this expanded paved area and the visual and spatial impacts caused by the removal of the tree/vegetative buffer and the introduction of the new seat wall.

Unlike anywhere else in the current rehabilitation proposals, the significant addition of structures, seat wall, and hardscape to the west/northwest of the Seneca Plaza fountain (the lawn apron here appears to be reduced by more than two-thirds along the western edge, in contrast to its northern and eastern lawn borders), significantly impacts the fountain’s integrity of setting, which is the signature (and iconic) design element in the plaza, and has an adverse effect on the landscape language that is introduced here by Halprin as part of his cohesive choreographed movement that sets the stage as one moves toward the Canyon Fountain.

In terms of views and vistas inside Seneca Plaza, it’s also worth noting that based on the illustration on Page 26 of the presentation, the orientation of the seated viewers on the proposed seat wall is toward the multiple bathroom/“conciierge” structure – the viewers are looking at toilets and turning their backs on the central fountain.

In terms of the site furnishings, signage, and lighting, there is no prefatory language about the “design approach” and “design intent” for the proposed work. Therefore, it’s unclear how design decisions affecting each of those proposed furnishing and features were made.

Rather than relating to the existing design (a tenet expressed by Halprin in a January 1969 *Architectural Forum* article) these new elements read as superimposed or an imposition on the original. The new lighting, for example, neither recedes nor complements the existing lighting and site design. Rather, it is discordant and competes for attention. By contrast, see the image (below) of the lighting that has been installed at Seattle’s Waterfront Park, designed by Field Operations, which recedes and does not call attention to itself.

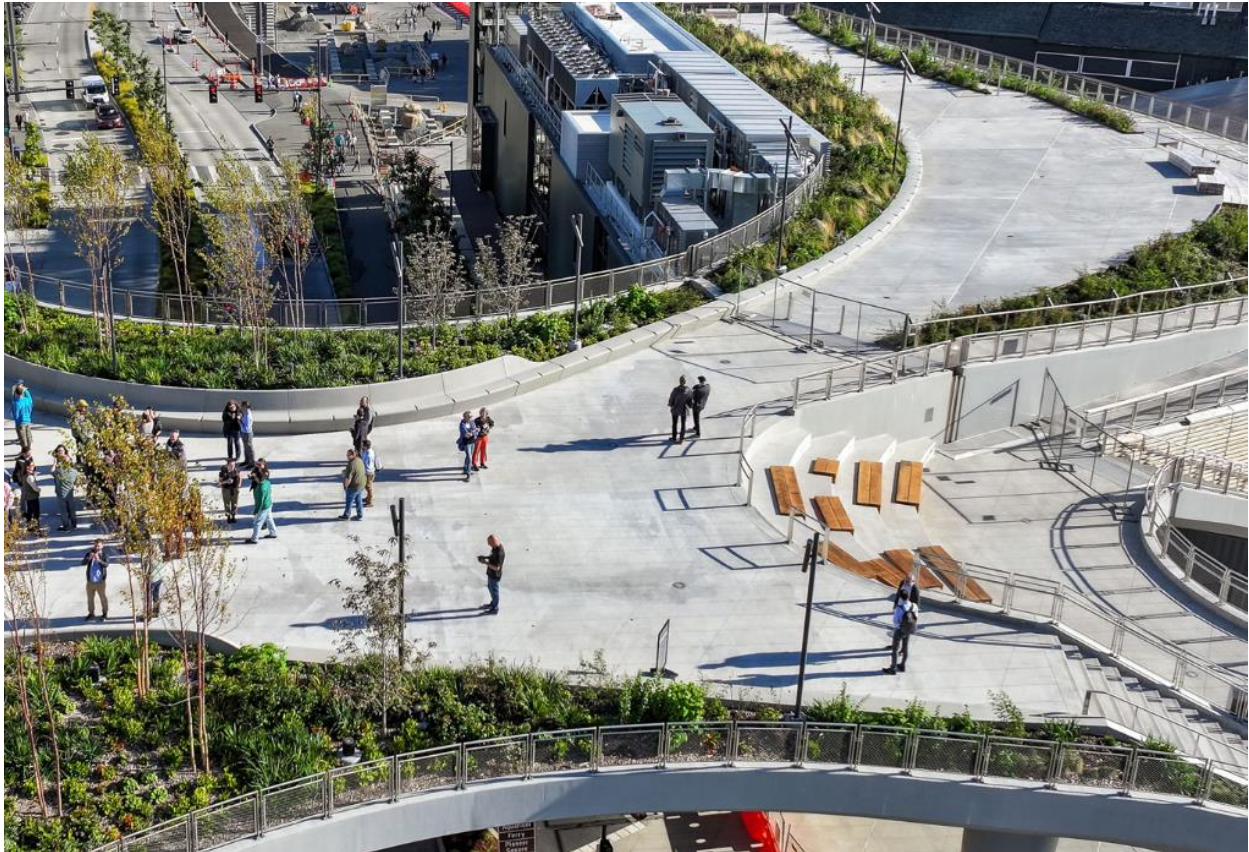


Figure 3: Pedestrian-scale light standards in Field Operations design for the Seattle Waterfront. Here fixtures perform their role while receding.

We understand that signage and wayfinding is essential, and although there is a very clear hierarchy proposed, there seems to be limited historic preservation standards regarding its impact on both the historic visual and spatial design intent, and sensitivity to extant historic fabric (e.g. , there is no discussion of when new signage should be affixed to historic walls as shown on page 46). Would historic buildings, particularly those listed in the National Register or designated as a Seattle City Landmark, be treated in the same way and have signage affixed directly to the historic resource?



Figure 4: Extent of signage placed throughout the park is extensive. What are the criteria for evaluating the proposed hierarchy and its impact on the park’s visual and spatial relationships and historic fabric?

As for the newly designed benches, although these share a similar material vocabulary which is commendable, the introduction of the new acute angles at the base’s ends and along the bench’s back elevation does not respect Halprin’s original design. Halprin was consistent in the use of 90-degree angles throughout for paving, walks, fountains, and other built features. He deviated from this standard on rare occasions to purposely secure the visitor’s attention (see Figure 5, below).



Figure 5: Built elements at Halprin’s F.D.R. Memorial, Washington, D.C., break from the strict use of right angles at purposeful moments to secure the visitor’s attention. (Charles A. Birnbaum, photo 2020)

This new treatment, like the proposed new light fixture standards, draws unnecessary attention to them as objects as opposed to harmoniously receding.

At the outset, we acknowledged that there is much to appreciate in the vast majority of the work that has been done to date. We remain optimistic that the concerns raised about Seneca Plaza, first at our virtual meeting on November 1, 2024, our [letter of November 24, 2024](#), and this present letter, will be addressed to avoid, minimize, and mitigate the substantial adverse effects. This coupled with the improvements raised regarding furnishings, lighting and signage, would do much to further elevate this work and to safeguard the eligibility of the property that is a potential candidate for a future National Historic Landmark designation, or even as a World Heritage Site as the work of a master and the progenitor of a new landscape typology, the capped freeway park.

Once again, thank you for the opportunity to raise these concerns. As a consulting party, we are here to offer comments, assistance, and provide context based on our extensive experience as the author of the [Guidelines for the Treatment of Cultural Landscapes](#) (Department of the Interior, National Park Service, 1997), decades-long involvement, many as a consulting party, with evaluating and managing change in modernist landscapes including those designed by Lawrence Halprin, and as co-curator of the traveling photographic exhibition [The Landscape Architecture of Lawrence Halprin](#) (ongoing since 2016). Seattle is blessed to have one of his most significant and globally influential designs.

Let's get this right.

Sincerely,

A handwritten signature in dark ink, consisting of a stylized 'C' followed by a horizontal line that tapers to the right.

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
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David Graves, Strategic Advisor, City of Seattle, Seattle Parks and Recreation
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