



January 18, 2026

Ms. Erin Doherty, *Landmarks Coordinator*,
Ms. Sarah Sodt, *City Historic Preservation Officer, Landmarks Coordinator for Downtown, South Lake Union, First Hill, and Pike/Pine Neighborhoods*
Seattle Department of Neighborhoods
P.O. Box 94649
Seattle, WA 98124-4649

Dear Ms. Doherty and Ms. Sodt:

Thank you for this opportunity to offer comments on the proposed modifications to Gas Works Park, which was designated a Seattle Landmark in 1999 and listed in the National Register of Historic Places.

The Cultural Landscape Foundation (TCLF) understands the city's need to secure the complex to prevent unsanctioned activities that could result in serious injury. TCLF is also sympathetic to the tragic death this past summer of a fifteen-year-old boy and the unspeakable grief his family must be enduring.

TCLF always strives to be pragmatic and advocates for a sympathetic approach to managing change, recognizing that landscapes and landscape features often have to be adapted to address new and /or unforeseen needs, issues and circumstances. This can be done with National Register eligible and designated works; a prime example is Minneapolis' Peavey Plaza, which had been slated for demolition and instead was thoughtfully rehabilitated.

When dealing with potential adverse effects to historic resources, the goal is to avoid, minimize, and mitigate. Unfortunately, the changes Seattle Parks and Recreation (SPR) seek to make have gone from "selective removal" (which Landmarks denied in October 2025) to the removal of "all pedestrian appurtenances. SPR's [certificate of approval application](#) dated "December 18, 2025, updated January 8, 2026" cites a 34-page report from Guidance Engineering to essentially **claim that SPR is impotent in its ability to secure the complex, and largely regurgitates debunked and disproven claims, including about landscape architect Richard Haag's intent.**

SPR's interpretation of the Guidance Engineering report repeatedly leads them to the conclusion that any remedial actions—additional fencing, anti-climbing devices, repairs, etc.—are not practical. This example is emblematic of SPR's approach: the Guidance Engineering report cites fourteen instances of illegal climbing that resulted in injury and/or death and states "All of the incidents occurred at night between the hours of approximately 10:00 PM to 5:30 AM when the park was closed." If that's the case, why not have a temporary solution that calls for policing during these hours, while a long-term solution is developed. Instead, SPR adopts an extreme and resolutely inflexible position: "Adding private security or police staff for continuous surveying indefinitely is not economically feasible for SPR."

In fact, SPR neither offers anything to substantiate the economic infeasibility nor why such a solution could only be indefinite (a condition they created). They are thoroughly inflexible.

But wait. While SPR is concerned about illegal climbing, they seem willing to accept some level of risk. SPR acknowledges that *after* the appurtenances are removed, “people will continue to climb the towers.” They offer the following qualification: “removing the pedestrian appurtenances that are the potential targets will likely limit the number and type of individuals who can climb the towers to those more skilled in climbing.” They continue: “The towers outside the fence that have no appurtenances are climbed by more skilled individuals and there are no documented serious injuries or fatalities associated with those towers.”

Yet. What happens if a person “more skilled in climbing” falls and suffers a serious injury, or heaven forbid dies? What would SPR do? Call for complete demolition?

On that matter they are opaque: “Another alternative to eliminate any risk of falls would be to seek complete demolition of the towers within the fenced area. This alternative would remove all of the monolithic features that were part of Richard Haag’s vision, rather than removing some of the attachments to the towers, which would leave them in a similar condition to those located outside of the fence.”

As a reminder, at the October 1, 2025, meeting of the Seattle Landmarks Preservation Board about proposed alterations to Gas Works Park, Andy Sheffer, SPR’s Deputy Superintendent of Operations called for the removal of the “pedestrian appurtenances” claiming that “the intent of these structures was that they would deteriorate over time.” While Sheffer did not specifically claim this was the intent of Rich Haag, the landscape architect who designed the park, **several members of the board believed that to be the case and indicated that Haag’s alleged “intent” was vote determinative.**

Fortunately, board members Caton, Thomas, and Pheasant-Reis asked for proof, the latter two wanted it “in writing,” and Caton said: “So if that is truly Rich Haag’s vision, then let’s hear about it so that we can make an informed decision.”

Sheffer told the Board: “We have no problem coming back and responding to the concerns.” He added: “So, by all means we will respond to request for additional information.”

The latest [certificate of approval application](#) still fails to provide written proof from Haag that “the intent of these structures was that they would deteriorate over time.” Despite references to Haag’s intent and vision, there is not a single citation from any interviews, including the [video oral history](#) that TCLF produced about Haag, scholarly publications, or any other source. **SPR has provided nothing “in writing” about Haag’s intent as board members had requested.**

As they did [in their response of Oct. 9](#), SPR once again “Included … excerpts from the Seattle Landmarks and National Register nominations, the original Myrtle Edwards, now Gas Works Park Master Plan documents and Rich Haag’s original design drawings for the park … [T]aken together all of the references and plans show Rich Haag’s intention to retain the towers, given their visibility and monolithic nature.” SPR again added: “There is **no** reference to the pedestrian appurtenances, and they are not shown on the plans.”

Rather than rely on SPR’s excerpts, TCLF looked at the full 243-page [National Register Nomination](#). Page 90-91 includes the following:

Haag's other pruning was of pipes and catwalks which provided a safety hazard, and the removal of several large metal sheds to open up the site to the views of the Lake and the City. Foreseeing the impact of the design, he predicted that this would give Seattle the only park in the world which would incorporate any aspect of industrial age. (Weems, 1980) Upon completion of the Park, The New York Times (8/30/75) lauded the design as "Seattle's pre-eminent piece of public sculpture." [emphasis added]

Haag had in fact addressed the pipes and catwalks deemed a safety hazard; what remained was part of his "intent." Later, on page 121, is this:

A 2002 structural analysis of Gas Works Towers 1 & 2 conducted for the City of Seattle revealed that the Towers are structurally sound. **The only elements that needed structural work were the catwalks and several braces, all were repaired in 2006.** [emphasis added]

Haag was involved in the repairs and rehabilitation at this time and these catwalks and braces would not have been fixed if that was not part of his "intent."

What SPR claims is "not shown" is actually right there in black and white. The images labeled "Portion of Rich Haag's 1975 Site Plan showing the Towers and surrounding area," "Landmarks Nomination package; Rich Haag's drawing showing structures to be preserved" **clearly show octagonal borders around each tank that correspond with the catwalks, and each shows another feature slated for removal, the multi-level platform/walkway in the middle of the four-tank sequence.**

As stated at the outset, TCLF is understanding of the need to protect the public and reduce risks of injury or death. Moreover, TCLF is not intransigent; it looks for pragmatic solutions for managing change at historically and culturally significant landscapes.

Unfortunately, SPR has gone straight to removal and refuses to consider implementing temporary solutions and other interim measures while long-term solutions are developed. Instead, they have dug in their heels and rigidly assert there is only one path forward and only one possible solution for Gas Works Park..

TCLF respectfully requests that the certificate of approval application, as currently written, be denied.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founding President & CEO