Hon. Samuel Chung

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

DENNY BLAINE PARK FOR ALL, an unincorporated neighborhood association, Plaintiff, vs. CITY OF SEATTLE, a Washington municipal corporation, Defendant.	No. 25-2-12422-3 SEA DECLARATION OF ANDY SHEFFER

I, Andy Sheffer, state and declare as follows:

1. I am over the age of eighteen and competent to testify to the matters herein.

2. I am the Deputy Superintendent, Planning & Capital Development Branch, Seattle Parks and Recreation Department ("Parks").

3. I have worked for Parks in various capacities for over twenty-five (25) years.

4. I understand this Court has ordered the City to present the Court an abatement plan as part of the Court's order regarding Plaintiff's Motion for Preliminary Injunction in this matter.

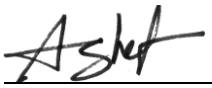
5. Attached to this declaration as **Exhibit 1** is a true and accurate description of the City's

Ann Davison
Seattle City Attorney
701 5th Avenue, Suite 2050
Seattle, WA 98104-7095
(206) 684-8200

current plan for the Park given the Court's order on preliminary injunction. The City might seek to revise this Plan in the future based on multiple factors, including based upon observed circumstances at the Park.

I swear under penalty of perjury that the foregoing is true and correct and is based upon my personal knowledge.

EXECUTED this 28th day of July, 2025 at Seattle, Washington

By: 

Andy Sheffer

Ann Davison
Seattle City Attorney
701 5th Avenue, Suite 2050
Seattle, WA 98104-7095
(206) 684-8200

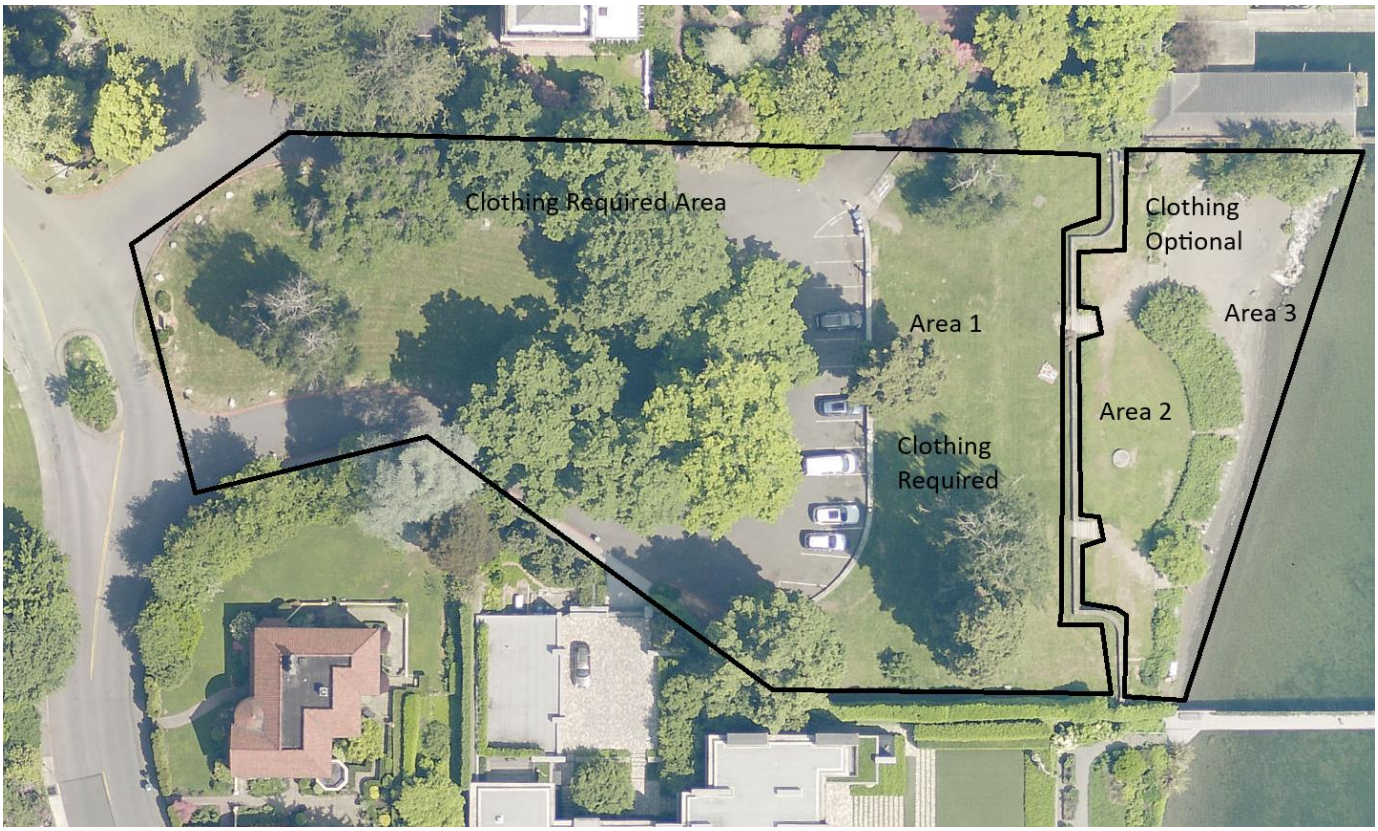
Exhibit 1

Pursuant to the Court's Order, the City's initial abatement plan includes the following. This plan will likely evolve over time.

1. Clarify clothing requirements for Denny Blaine Park (Park).

- Restrict clothing optional areas to two sections of the Park and adopt a site map that establishes (1) clothing required areas of the Park and (2) clothing optional areas of the Park that are visually screened from other parts of the Park and from neighboring properties:

Street to Parking and Area 1 – Clothing Required
Areas 2 and 3 – Clothing Optional



Seattle Parks and Recreation (SPR) identified these sections based on the limited size of the Park, its geographical terrain, and its historical nude use.

2. Signage.

- Install signs at Park Entrances, parking lot, and at dividing line between clothing optional and clothing-required areas. Signs will notify public:

a. That no criminal lewd acts including masturbation, simulated sex, or other sexual activity are allowed in any area of the Park.
b. That the SPR Code of Conduct and Rules and Regulations and Seattle Municipal Code/Revised Code of Washington apply to Park use.
c. Of the location of the clothing optional and clothing required areas.
d. Of the Park hours.

3. Visual barriers.

- Establish visual barriers to separate clothing optional Park areas from clothing required Park areas. These areas are based on historical nude use of the Park, neighborhood concerns about visibility of nudity, and Park features and topography. Barriers may include meshed fencing, hedging, increased plantings, or other delineated boundaries in conformance with Crime Prevention Through Environmental Design (CPTED) assessments.

4. Increased staffing.

a. Park Rangers and/or SPR Staff will increase staff hours from current roughly 45 total minutes per week to on-site shifts 3 days a week for 2 to 4 hours.
b. Park Maintenance Crews will perform increased maintenance to remove trash, establish a more dedicated trash receptacle location, manage and check in on visual barrier and sign integrity, and ensure any graffiti, vandalism or other needed maintenance is addressed timely.
c. Parks will assess need for additional trash receptacles and litter pick up in the different areas of the Park and add additional receptacles as necessary.

5. Consideration of parking modifications

- Parks will consider improvements to parking to help with egress and ingress.

6. Enforcement

- Park Rangers will use a progressive discretionary enforcement approach which may include education, warnings, and citations for people engaged in activities not in conformance to Rules and Regulations, and seek voluntary compliance pursuant to their authority.
- Park Rangers may request assistance from the Seattle Police Department (SPD) to trespass offenders for criminal lewd conduct and contact SPD if they encounter criminal lewd conduct.
- Parking Enforcement Officers (PEOs) will continue to enforce traffic/parking violations.