

Comments on the proposed Colman Park Vista project - July 2016

Attn: **Pamela Kliment – Planner** Seattle Parks and Recreation

Please accept the following comments into the record for the Vista Project. They have no particular order or priority.

The permanent conversion of a forested Natural Area into a vista contradicts numerous City policies and regulations. See below.

The entire 24 acres Colman Park has been designated and managed as an urban Natural Area for decades. At least a million dollars have been spent in Coleman Park alone to restore and establish a native conifer forest. The Farris settlement and the Starflower Foundation are a few of the major contributions. Project proponents claim the west slope of Colman Park is not a designated Natural Area due to the citywide reclassification of all Parks property in 2015. Where are the Supplemental Use Guidelines for all our former Natural Areas?

Another management document overlooked is the Lake Washington Boulevard (LWB) – Vegetation Management Plan (2008) prepared for Seattle Parks Department which clearly states if a Park such as Coleman does not have a Plan then the Boulevard VMP should be used as the management tool until a park specific VMP is created. (see Page 9). The VMP refers to the indigenous slope forest within Colman Park as the dominant natural element. The topping and removal of trees along the west slope compromises the integrity of the Boulevard vegetation and the intent of the VMP.

VMP design intent objectives and goals identify preserving and enhancing the ecological continuity and only provide views from within the Parks and not from adjacent parcels or right-of-ways. Sheet #21 and #22 of the VMP show a total of 3 viewpoints from the Boulevard within Coleman Park.

Major vegetation planning and restoration work was completed prior to the LWB-VMP in the lower portions of the Park by funding from the Starflower Foundation to reestablish a native conifer dominant forest.

Urban forestry goals have also been created to protect and enhance vegetation in natural areas. The Green Seattle Partnership includes the western slope of Colman Park in its restoration efforts as part of a citywide plan. Planting of evergreen trees is outlined for reclaiming areas such as the neglected west slope of Colman.

The last goal of the forestry program is to gain community appreciation for the benefits of trees and engagement in caring for trees. The Colman Vista proposals fails on both counts and should not move forward as envisioned.

The trees on the western slopes of the Boulevard have not been inventoried and was considered high priority in 2008 and again in 2011 as part of the Green Seattle Partnership – Forest Monitoring Program.

The Boulevard corridor including Colman per the LWB VMP should be managed for wildlife habitat by increasing diversity in the forest structure and function.

The Olmsted design intent was to retain a wild and natural aesthetic and to create a buffer from the cities' urban structures using evergreens.

The Colman Vista proposal is misleading by the use of the term "restoration" given the site was originally an ancient conifer forest dominated by trees likely well over a hundred feet tall. Early drawings and photographs indicate the slopes surrounding Lake Washington were covered primarily in fir, cedar, hemlock and madrone.

Green Seattle Partnership has currently enrolled the entire Colman Park. The design intent for the slopes is to be managed as a forested parkland. The target forest type for GSP restoration is mixed conifer dominated by Douglas Fir. Millions of tax dollars have been earmarked to fully fund the GSP program citywide and complete

the forest restoration of slopes including upper Colman. The most urgent need is to develop a comprehensive vegetation management plan for the entire 24 acres of Colman and not to piecemeal individual sections. The Starflower work with Charles Anderson was a great start beginning around 1996 and continuing thru 2007 but only covered about 10% of the Park.

For vegetation restoration projects greater than 1,500 sf in a critical area such as the Colman steep slopes, SEPA review is required. This would include the impacts from the proposed 20+ feet wide trail corridor clearing suggested in all alternatives.

During the most recent presentation by the Friends of a Vista consultants on June 6th the public was shown only one option for trail construction and maintenance. A 6-foot wide trail surface with a 24-foot wide clearing for a view corridor was presented. No mention was made of Seattle Parks trail standards or other options to minimize impacts along trails. The trail plan also included a new segment of trail across the slope at the base of the SW stairway. This trail segment (approximately 250 lf) is currently not part of the Seattle trails system but has been presented as being well established. No studies have been done to establish a need for this additional trail and currently there is no funding for any component of the Vista project. Who will be responsible for the long-term maintenance of the trail system?

Mt Baker Ridge Viewpoint Park – 2015 DON Grant for preserving views thru Invasive Vegetation Control - \$13K + match for “This project will remove black locust saplings and other invasives, restoring the native habitat and preserving the view corridor. Also we will complete a small amount of replacement planting.” Appears to bring into question long term funding for maintenance of viewpoints. Responsibility of the Park Department or private funding and not other City Departments such as DON.

Colman Vista received DON grant funding as well. No mention of views or vistas. As follows: Restore Colman “Park’s West Slope to Olmsted Design - Colman Park Restoration Project: This project will continue ongoing efforts to engage the community in the development of a vegetation plan for the west slope of Colman Park. Consultants will be hired to work with the community and Parks to develop a specific actionable plan to restore historic vegetation in this heritage Park. \$23,500.00 “. Raises questions of misinformation and misleading requests. The main objective has been from the beginning is to permanently remove native trees and vegetation just as the early loggers did prior to the Olmsted visit to Seattle.

During a Friends of Seattle Olmsted Parks meeting in May of 2014 the Colman Vista proponents presented their project in order to seek support from the FSOP organization to create a viewpoint along 31st. Surprisingly, a FSOP Board Member, who is also currently an acting Seattle Parks staff Ecologist, offered to coach the neighborhood Vista group thru the planning process. He suggested they avoid the use of viewpoint and instead refer to the project as a “restoration”. It was also made clear they would likely not be able to eliminate entire trees and would need to follow Park standards where generally no more than 25% of the coppiced maple stems should be removed. It appears the term “restoration” was altered to include views and the existing trees were deemed disposable. Should not Parks Ecologists be protecting and preserving our natural areas and trees?

Seattle has numerous viewpoints overlooking Lake Washington with several in the Colman neighborhood. During the late 1990’s policy was developed around viewpoint creation and Parks has currently limited the number in the City. Viewpoints are **from** public places consisting of specified viewpoints, parks, scenic routes, and view corridors. The 31st Ave South arterial travel corridor above Colman Park which is owned by SDOT does not appear to meet these criteria. Numerous views of distant mountains and waterways are available within easy walking distance from the project site with the most recent addition being the Mt Baker Ridge Viewpoint to the north several blocks.

Tree topping is prohibited according to the 2001 City Tree Policy 060-P 5.6.1 Section 4.4

We are currently lacking a Senior Urban Forester with the Parks Department for making Tree Policy decisions.

Loss of canopy coverage will require mitigation and planting will be required to match or exceed the loss of mature canopy. See Tree Policy 6.5.3 Begs the question of where the matching canopy will be created.

Have the partnerships been involved in light of Seattle Tree Policy 6.5.1 ? where it states: "Does the scope of work have the potential to achieve enhancement of the vegetation resource for public benefit, specifically with regards to policies presented in Section 4 concerning tree protection, tree replacement, wildlife habitat, slope stability, and partnerships."

Friends of Vista website is misleading. Especially the images. The front page image of Mt Rainier is from some nearby location and not from Colman Park. Also, it does not appear as if a view of Rainier is even possible from 31st Ave above Colman Park. Another image on page #5 of the website from 1991 was taken from private property across the street and at an elevation not available to the public. This is somewhat misleading to assume the public will be able to enjoy these "restored" views. Obviously any vegetation clearing will benefit the private property owners along 31st given the current tax structure in King County which rewards view property.

On page #6 of the website www.colmanparkvista.com there are several images of what are described as Maple stump suckers. Why is there not a City staff arborist making an unbiased assessment? The image on the right is not a Maple (acer macrophyllum) stump but rather our native beaked hazelnut which naturally grows in a multi-stemmed form. Again the proponents are misinforming the reader, this time in regards to forest health and native plantings.

This portion of 31st Ave has been claimed to be a "scenic drive" by proponents. This appears to be misleading. Mapping done for the 1987 Open Space Policies as well as the Scenic Routes designated by the Seattle Engineering Department in Ordinance 97027 do not include the segment of 31st Ave west of Colman Park. Lake Washington Blvd within Colman Park is clearly designated as a Scenic Route and extensive views are available both within and outside of the Park from the Blvd as envisioned by the Olmsted Brothers.

During the June 6th Friends of a Vista group presented to the public, "Full and Immediate" removal of vegetation as the desired end result on the western slope of Colman Park below 31st Ave. The City Tree Policy was never discussed and the proponents claimed there is not a VMP applicable to the slope.

On page #13 of their presentation they quote a 1910 letter from the Olmsted brothers regarding clearing of "wild growth". They did not follow-up by mentioning the same letter states: "The steep slopes along the drive and borders of the Park should be carefully planted with trees and shrubs". The focus of this project has been on removing trees from the beginning of the process. A plan sketch developed by the Olmsteds in 1910 shows existing trees mapped throughout the Park including the area now permanently converted to a Pea Patch. I'm sure the Olmsted Brothers did not envision a Pea Patch in the middle of their Park and the clearing created by the Patch simply begets more tree removal. The plan also shows extensive planting of trees along the borders of the Park including along 31st Ave S. The Olmsted planting palette was never developed for the Park but the LWB-VMP and other Olmsted supporting documents indicate Douglas Fir, Red Cedar, Western Hemlock, Madrone, Spruce, Grand Fir, White Pine and other conifers were to be used.

Also of note is the Colman Park kiosk at the lakeside with information regarding the Olmsted vision. Primary to their design was "A place to get away from the bustle and jar of the streets". Yet this appears to be in direct conflict with the proposed creation of an open Vista from the busy 31st Ave where passing traffic might be able to "steal" a quick view.

Thank you for taking these comments into consideration.
All the Best!

Darrell Howe