

Seattle Urban Forestry Commission

Leif Fixen, Chair • Tom Early, Vice-Chair

Gordon Bradley • Donna Kostka • Richard Martin • Joanna Nelson de Flores • Jeff Reibman • Erik Rundell • Steve Zemke

July 8, 2015.

Seattle Board of Park Commissioners
100 Dexter Ave N.
Seattle, WA 98109

Re: Draft Supplemental Use Guidelines for Natural Areas/Greenbelts

Seattle Board of Park Commissioners:

The Urban Forestry Commission would like to provide the Board with input on the Draft Supplemental Use Guidelines for Natural Areas/Greenbelts within the July 16 written comment period as stated on their website.

The Commission opposes Seattle Parks and Recreation's current Draft Supplemental Use Guidelines for Natural Areas/Greenbelts. Commission members urge you to vote NO on the proposed draft and return it to Parks staff as inconsistent with the 1993 Greenspaces Policy (Resolution #28653) adopted by the Seattle City Council.

The Commission reviewed Parks' February 19, 2015 and June 3, 2015 briefing memos:
<http://www.seattle.gov/Documents/Departments/ParksAndRecreation/BriefingPapers/Park%20Board%20Briefing%20Paper%20Natural%20Area%20%20Greenbelt%20Use%20Guidelines%206-3-2015%20DRAFT.pdf>

The Commission believes Parks' Draft Supplemental Use Guidelines for Natural Areas/Greenbelts are:

1. Contrary to the 1993 policy established by the City Council. The Commission recommends Parks to withdraw or re-write the draft to bring it into conformity with the 1993 policy. Or, if Parks feels it needs to change the 1993 policy, it should work directly with the City Council to do so.

Note the language comparison in Appendix A to see that Parks has missed the intent of the 1993 policy to restrict public use of natural areas/greenbelts to low impact or passive recreation as compared to active recreation.

2. Unbalanced in favor of new uses and unclear on how decisions will be made. The intent of the 1993 policy is to preserve natural areas/greenbelts as natural areas, so a proposed draft checklist should clearly measure a proposed new use against criteria

which are aligned with the 1993 policy. The new uses might even require Seattle City Council action.

Note the Commission's suggestions in Appendix B on how the Draft Supplemental Use Guidelines for Natural Areas/Greenbelts might be brought into conformity with the 1993 policy.

The Commission recognizes the potential benefits of allowing additional uses to build constituencies for the protection and preservation of natural areas, so long as the new uses are consistent with existing City Council approved policy for natural areas/greenbelts uses, and clear, specific criteria for evaluating new uses in effect.

The Commission believes additional time will be needed for the public, the Seattle City Council, the Board of Park Commissioners, the Urban Forestry Commission, and Seattle Parks and Recreation, to resolve this issue. The Commission recommends that sufficient time be taken to fully examine the impacts and benefits of new uses. Parks' trees, vegetation, and wildlife in our natural areas and greenbelts are a huge part of the City's urban forest. They are a scarce commodity in urban areas – worth preserving for current and future generations.

Thank you for the opportunity to comment.

Sincerely,



Leif Fixen, Chair



Donna Kostka

cc: Mayor Edward B. Murray, Council President Burgess, Councilmember Bagshaw, Councilmember Godden, Councilmember Harrell, Councilmember Licata, Councilmember Okamoto, Councilmember Rasmussen, Councilmember O'Brien, Councilmember Sawant, Jessica Finn Coven, Jesús Aguirre, Christopher Williams, Dan Johnson, Susanne Rockwell, Eric McConaghy.

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Appendix A

Comparison of language in 1993 Policy with language in two 2015 briefing memos

The language of the 1993 Greenspaces Policy adopted by the Seattle City Council says:

“The purpose of greenspaces designation is to establish priority areas for preservation to 1. Help preserve natural landscape and habitat for wildlife, 2. Provide natural buffers between land uses of different intensity or areas of distinct character or identity 3. Help mitigate the effects of noise and air pollution 4. Help reduce the necessity for constructed storm water systems 5. Help preserve the quality of natural drainage systems and enhance the stability of the land. Greenspaces, with their natural environmental character, will only be used for low impact activities and will complement the city’s parks and recreation system where open space may be used in a more active manner.”

February 19, 2015 briefing memo, page 2:

First paragraph:

“Parks does not intend to amend the existing City Policy....”

Second paragraph:

“1993 (Resolution 28653) Greenspaces Policy and Designated Greenspaces as part of the City’s Open Space Policies. As a major component of the City’s comprehensive open space system, greenspaces (included in this definition are natural areas and greenbelts)will be used only for low impact activities....”

June 3, 2015 briefing memo, page 3:

First paragraph:

“...the proposed use guidelines strike a balance. Uses, including walking and biking trails and challenge courses, will be allowed while minimizing adverse environmental impacts.”

June 3, 2015 briefing memo, page 7:

4.D.3: “Where appropriate, provide for the opportunity for challenge course area(s), orienteering type activities and future activities that may evolve.”

Appendix B

Urban Forestry Commission's suggestions on how the Draft Supplemental Use Guidelines for Natural Areas/Greenbelts might be brought into conformity with the 1993 Policy

1. Environmental Critical Areas (ECAs) should be withdrawn from new uses. They include fish and wildlife areas, steep slopes, landslide-prone areas, wetlands, streams, etc. – all vulnerable areas in which preservation of trees and vegetation are critical to the sustainability of those ecosystems. They also ensure that those designated fish and wildlife areas will be preserved to have the opportunity to become future “wildlife sanctuaries” in the City – a category Parks currently is willing to withhold from new use consideration along with marine sanctuaries. ECA areas deserve being held in trust for future generations and used today for education and scientific purposes in conformity with the 1993 policy. Parks should inventory and list which areas on their list of natural areas and greenbelts contain environmentally critical areas and note these are off limits for consideration of new uses. They should do this before considering any new use proposals so as to not waste time and money of both Parks and residents considering proposals that would be denied.

2. Revise the checklist into two sections. The draft checklist gives the public the perception that ‘environment’ is only one in four or 25% of the areas of evaluation for a new use. Sustaining the City’s forest and vegetation should be Park’s first priority within the Natural Areas and Greenbelts. So, at minimum, environment should be given at least equal weight with non-environmental considerations in a checklist to determine impacts/benefits. We urge:
 - a. A reorganization of the checklist into two sections, the first -- environmental preservation/acquisition (broader than the proposed “habitat” section) and the second - public access/education/recreation/safety, or similar wording, followed by:
 - b. A determination that the location for a proposed new use cannot be met any other place but in a natural area/greenbelt, and
 - c. A determination that the proposed new use conforms with the 1993 policy and, if not, if it needs to go to the City Council for approval.

3. Parks should add to its draft checklist:
 - a. Numbers for all lines in the checklist to enhance readability and clarity, and
 - b. Measurable and clear criteria that summarize how a decision will be reached on a new use proposal, citing what will happen if the proposal is non-conforming with the 1993 policy.

All proposed new uses need to be explained in detail including describing what type of trail is being proposed, e.g. pedestrian trail, bike trail, mountain bike trail, multi-use bike and pedestrian trail, as well as the length of the trail and its proposed route through the area. The checklist should list all potential trails that might be considered. All uses need to be specifically described as to proposed location and size of area to be used and any trees and other vegetation to be impacted or removed and/or replaced.

4. Parks must be sure environmental review of new uses includes all phases of the plan to initiate a new use in a natural area/greenbelt and allow sufficient time to evaluate the new use in action before extending the use to other areas or opening an area to any other new uses. We urge Parks to write into its Supplemental Use Guidelines that:

- a. All phases of a new use must be considered at the same time to be sure cumulative impacts are evaluated sufficiently, and
- b. Allow at least five years after the last phase for Parks to evaluate environmental impacts before any other new use is considered for a designated natural area/greenbelt or the use is extended to other natural areas/greenbelts.

5. Parks must maintain its commitment to the Green Seattle Partnership. The thousands of hours contributed by Seattle residents both individually and through the Green Seattle Partnership in restoring forest land in Parks' natural areas/greenbelts can be threatened by new uses. Volunteer participation in future restoration work could depend on their attitude concerning Parks' process. They currently plant more trees and other vegetation than any other group in the City, and Parks should not jeopardize this significant source of volunteer labor and moral support.

We urge Parks to write into its policy that before there is a final decision on a new use in a location, it ensures:

- a. Mandatory consultation, collaboration, and substantial agreement with neighbors, volunteers, and any "friends of" or "adopt a park" groups that have worked in a designated natural area/greenbelt, followed by:
- b. An extensive public process to ensure that all citizens in the city have a chance for input on changing the use of a natural area/greenbelt, and
- c. Going to the City Council for approval of a non-conforming new use.

6. Parks must make all new uses being considered transparent. "Future activities that may evolve" is a potential loophole that could be open to interpretation and have serious impact on the City's trees, vegetation, and wildlife in its natural areas/greenbelts. The proposed guidelines leaves it open to whatever may be suggested in the future. We urge Parks to clearly list and describe only those new uses that are being considered at this time so as not to create future controversy by leaving the term "future activities that may evolve" open ended.