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Field Verification Is Necessary to Support the ARP's Goals, Implementation, and Long-Term Success

Relationship to the Goals of the Alternative Restoration Plan

The purpose of the Burnt Bridge Creek Alternative Restoration Plan should extend beyond describing general watershed conditions. To successfully improve water quality and watershed health, the ARP must identify appropriate restoration actions, establish implementation priorities, monitor results, and adapt future work when conditions change or restoration efforts are unsuccessful.

Achieving these goals requires an accurate understanding of actual conditions on the ground.

This comment does not request that Ecology investigate every isolated historical incident or revisit every past enforcement decision. It requests that Ecology use the existing knowledge of the City's specialized field staff to verify representative Greenway conditions, identify restoration needs that may not appear in broad studies, and ensure that the ARP's proposed actions and monitoring program are based on actual site conditions.

Limitations of Broad Tree-Density and Existing-Conditions Analysis

The ARP relies on reports, mapping, technical analysis, and broad measurements such as tree density. These tools are valuable for understanding the watershed at a landscape scale, but they cannot fully identify localized environmental damage or determine whether restoration is needed at individual sites.

Along the Burnt Bridge Creek Greenway, damage often occurs as a series of smaller, dispersed impacts beneath an otherwise intact tree canopy. These impacts can include:

Individual trees cut for firewood or construction.
Bark removed from living trees.
Saplings, understory vegetation, and planted trees destroyed.
Soils compacted or disturbed.
Roots exposed.
Slopes damaged.
Small areas repeatedly cleared or occupied.
Previously restored or planted areas degraded.

A broad tree-density analysis may continue to classify an area as adequately forested while missing individual damaged trees, small cleared areas, loss of future tree growth, and repeated disturbance that prevents natural regeneration.

Existing Specialized Field Knowledge

The City's Greenway and Sensitive Lands Group maintains the Burnt Bridge Creek Greenway and

other similar environmentally sensitive areas. This specialized group has direct field knowledge of the corridor, recurring problem locations, maintenance needs, previous cleanup work, and areas that may require environmental follow-up.

The group also tracks conditions observed in the field and sends messages, photographs, and maps to Mr. Potter for review and resolution. This existing process provides Ecology with an efficient starting point for identifying representative locations where field verification would improve the ARP.

Requested Initial Technical Field Review

Before the ARP is finalized, I request that Ecology conduct an initial technical field review with Mr. Potter and appropriate members of the Greenway and Sensitive Lands Group.

The purpose of this visit should be to:

Ground-truth the information and assumptions used in the ARP.
Review representative locations already known to specialized Greenway staff.
Identify localized damage that may not appear in tree-density studies, aerial imagery, or general mapping.
Review areas where removal of camps, garbage, or abandoned property occurred but ecological restoration may remain incomplete.
Determine whether damaged trees, vegetation, soils, slopes, wetlands, springs, or creekside areas require restoration or monitoring.
Confirm whether proposed ARP actions and monitoring measures are adequate to address the conditions observed.
Identify practical implementation needs that should be incorporated into the final ARP or its future work plans.

Ecology's direct participation is important because Ecology is responsible for reviewing and guiding the restoration-planning process. Direct observation would allow Ecology to independently understand the difference between general watershed conditions and smaller site-specific damage that may affect restoration success.

Follow-Up Field Review for ARP Participants

Following the initial technical visit, Ecology and the City should identify a manageable number of representative sites for a separate field review involving key ARP reviewers, decision-makers, technical staff, and those responsible for implementation.

A focused two- or three-hour field review would not need to cover the entire Greenway. Its purpose would be to allow key ARP participants to directly see and understand the relationship between localized tree destruction, vegetation loss, disturbed soils, erosion, stream shade, water quality, water temperature, and the long-term success of restoration efforts.

Requested Documentation and ARP Follow-Through

The initial technical field review should result in a basic written record identifying:

The locations visited.
The conditions observed.
Any identified restoration or monitoring needs.
Whether each issue will be addressed through the ARP or another City program.
The department or group responsible for follow-up.
How completion and long-term success will be tracked.

A restoration plan developed without adequate field verification risks overlooking smaller, repeated impacts that collectively affect the health of the Burnt Bridge Creek Greenway.

Using the knowledge of the Greenway and Sensitive Lands Group, conducting a documented Ecology field review, and allowing key ARP participants to observe representative sites would directly support the ARP's goals and improve the accuracy, credibility, implementation, and long-term success of the plan.

Link to Destruction of Trees along BBC
https://photos.app.goo.gl/er5ssnHuEA2HxXvZA