

From: [Steven Richmond](#)
To: [SW Permit Comments](#)
Subject: Forest health as "low-hanging fruit" of stormwater mitigation
Date: Wednesday, January 25, 2012 11:54:50 AM
Attachments: [Restoration Suggestions.docx](#)

Hello, I'm writing to suggest that a cost effective approach to mitigate pollution from stormwater is to better address forest health, including soil health, particularly in urban forests where pollution is more acute. It might be less expensive with greater benefits than engineered stormwater mitigation, though I agree that bioswales along roads with concentrated pollution are critical in salmon watersheds.

Currently, in Seattle at least, native plant restoration methods in urban forests unnecessarily expose topsoil/duff to erosion. Manual grubbing of blackberry is slow, expensive, and doesn't work, and there isn't enough money or woodchips to mulch exposed soil. Invasive plants are growing at faster rates than native plants and are inhibiting evergreen tree regeneration that is so critical to intercepting winter rains. A better practice might be to tolerate infestations (blackberry "knockdowns" that leave soil-binding roots and intercept some stormwater), clearing only enough to plant evergreens, and then maintain those trees until they eventually shade out the blackberry. We also have to prolong the lives of existing trees being strangled by English ivy.

I suggest better restoration practices in the attached critique of current methods, practices that might be applied in other watersheds and ecosystems. I also have "blogged" my concerns about the spread of invasive plants in <http://seedrain.org/>, where I briefly discuss my belief that the solution to actually solving our stormwater problem will be finding a way to incentivize private property cooperation and better restoration practices by public agencies.

Thank you for your consideration.

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