



SIERRA
CLUB
FOUNDED 1892

Washington State Chapter

180 Nickerson St, Ste 202

Seattle, WA 98109

Phone: (206) 378-0114

June 20, 2020

Erin Uloth
District Ranger,
Mt Baker Ranger District
Mt Baker-Snoqualmie Ranger District

Re: North Zone Revegetation Project, Scoping Notice, Public Scoping Letter Darrington Ranger
& Mt. Baker Ranger Districts

Dear Ms. Uloth:

While we generally approve of the goals of the purpose and need statement in the scoping letter for the above noted project, to improve degraded or damaged sites within the project area by revegetating with native plants and vegetative communities, we have a number of questions and possible concerns.

Further data is needed to evaluate this project and to provide adequate information to the public. Maps of the revegetation areas should be provided as should a list of the revegetation areas.

- **Roads:** Are any roads involved or planned for this project? Does this project require the reopening of any closed roads?

Are any revegetation sites within inventoried roadless areas (IRAs) or other unroaded areas? If so, please provide a roster of roads and trails, and a map of such roads and trails.

- **Herbicides:** Are any herbicide applications planned? If so, please give further detail.

- **Timber Cutting:** Will any timber cutting, whether commercial or non-commercial, be involved? If so, please provide a list of the sites involved and the estimated acreage of cutting.
- **Mapping:** Where will timber stand improvement and wildlife improvement treatments be undertaken? Sites for these treatments should be listed and described and maps provided.
- **Hazard Trees:** Please provide a count of hazard trees associated with this project. Are hazard trees primarily located in developed and dispersed camping areas? If not, in what other areas?
- **Heavy Equipment:** What portions of the revegetation sites will require use of heavy equipment, such as bobcats, tractors, excavators, etc.? Such equipment should not be used in otherwise non-motorized areas of the Forest. Additionally, this equipment should be limited to existing road beds or in areas directly connected to such road beds, not on trails. In general, the least damaging or invasive methodology should be employed in using heavy equipment.
- **Streams & Riparian Areas:** What accommodations are made for streams and riparian areas? Please provide a list of effects on stream health, such as culverts (additions or removals), ditching and channeling, setbacks and buffer areas that are involved.
- **Native Plant Species:** Genetically appropriate native plant species should be required, and should not simply be a “first choice.” The quantity of nursery stock needed should be identified in advance and the required funding for native species used for planting should be identified.
- **Wildlife Impacts:** What impacts to wildlife, both positive and negative, are expected both during active project implementation and subsequently?
- **Prevention and Enforcement:** In order to protect the resources that have been damaged by human activities and to prevent the recurrence of the activities that this project proposes to remedy, installation of robust and effective barriers must be included in appropriate areas and enforcement of the closures of these areas must be carried out. In particular, access points to riparian zones where overuse and misuse are occurring must be completely closed and controlled.

We look forward to the details of your analysis of this project and the opportunity to comment further once provided.

Sincerely,

A handwritten signature in black ink that reads "Harry Romberg". The signature is written in a cursive style with a large, prominent "H" and "R".

Harry Romberg
Washington Chapter Sierra Club
National Forest Committee co-chair
HBRomb@aol.com