27 April 2018

TO:  Dean Schlichting, McKenzie Ranger District

VIA: <https://cara.ecosystem-management.org/Public//CommentInput?Project=53543>

CC: deaddschlichting@fs.fed.us

Subject: Blue Pool Trailhead Parking Project – scoping comments

Dear Forest Service:

Please accept the following comments from Oregon Wild concerning the Blue Pool Trailhead Parking Project, <https://www.fs.usda.gov/project/?project=53543>. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore Oregon’s wildlands, wildlife, and water as an enduring legacy. Our goal is to protect areas that remain intact while striving to restore areas that have been degraded. This can be accomplished by moving over-represented ecosystem elements (such as logged and roaded areas) toward characteristics that are currently under-represented (such as roadless areas and complex old forest).

The proposed action alternative involves:

* 3 acre clearing for a new parking lot at the trailhead for Blue Pool

Oregon Wild supports the purposes of this project.

We urge the FS to consider an alternative that locates the parking lot outside of riparian reserves and outside of stands with mature & old-growth forest characteristics. This many require a new trail segment to link the new parking lot to the existing trail to blue Pool.

We also urge consideration of an alternative that builds a smaller parking lot (e.g., with half as many spots) allowing greater retention of mature trees.

Considering these alternatives would meet the FS’ purpose and need and mitigate resource impacts.

Take care to conform to the LRMP as amended by the Northwest Forest Plan and Aquatic Conservation Strategy.

A few of the applicable NWFP standards & guidelines include:

**RECREATION** RM-1. New recreational facilities within Riparian Reserves, including trails and dispersed sites, should be designed to not prevent meeting Aquatic Conservation Strategy objectives. Construction of these facilities should not prevent future attainment of these objectives.

**ROADS** **MANAGEMENT** RF-2. For each existing or planned road, meet Aquatic Conservation Strategy objectives by:

a. minimizing road and landing locations in Riparian Reserves.

b. completing watershed analyses (including appropriate geotechnical analyses) prior to construction of new roads or landings in Riparian Reserves.

c. preparing road design criteria, elements, and standards that govern construction and reconstruction.

d. preparing operation and maintenance criteria that govern road operation, maintenance,

and management.

e. minimizing disruption of natural hydrologic flow paths, including diversion of streamflow and interception of surface and subsurface flow.

f. restricting sidecasting as necessary to prevent the introduction of sediment to streams.

g. avoiding wetlands entirely when constructing new roads.

Sincerely,



Doug Heiken

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