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Blue Pool Parking lot scoping response

You indicate in your scoping for the Blue Pool Parking Lot project that the purpose and need for this project is to:

1. Improve parking capacity in order to provide for visitor safety.
2. Reduce impact to the natural resources at trailhead.
3. Improve the visitor experience.
4. Be a good neighbor to the Eugene Water and Electric Board (EWEB) campus and Oregon Department of Transportation.

You have supplied a conceptual design engineering drawing of what I presume is the proposed action that shows over 75 parking spaces but is labeled as Tamolitch Falls Parking –a different name than the project you are scoping. You have supplied no geographic or spatial information about the location or juxtaposition of the project proposal to the EWEB campus nor to the Oregon Department of Transportation (ODOT) location and you have supplied no information as to what is needed to be a “good neighbor” to these agencies and their location. You have supplied no information about the existing condition –e.g. what the current parking lot situation is, how many cars can park at the existing trailhead or what are the issues for ambulance and search and rescue, what are the current bathroom facilities.

You have supplied no information about other existing conditions such as wildlife or fish habitat in this area.

You have also supplied no information about what your forest plan as amended has specified for this area nor any information about other regulatory constraints. What part of the recreation spectrum does this area fit into?

You have supplied no information on what levels of visitor use the area currently receives or what you would expect it to receive after implementation of the proposed action.

The lack of information makes it difficult to respond appropriately to your scoping, however I will base my comments on my visit to this area about 2 years ago, the satellite views and maps available through Google Maps.

The current visitor use appears to exceed the capacity of the area and it is currently being degraded by the visitor use. There is opportunity for solitude or contemplation. The number of visitors is apparently currently unregulated or only regulated by the availability of parking.

Please specify in your EA:

* Who has the authority and responsibility for the action based on law, regulation and policy. The factors that will be used to make the decision. Are there any other agencies involved? Will there be any permits or concurrence needed from any of those agencies?
* The full effects of no-action.
* A full map and associated legend for the proposed action and the full effects of the proposed action and any other action alternatives. Will the new parking lot be in the same place as the existing just larger? Will you be removing any trees? What will you do with those trees: sell them or burn them?
* What will you be using any measures to reduce or stop noxious weeds? If so, what will those measures be?
* Mitigation measures and design features.
* Monitoring that is included as part of the project.
* Effects need to include T/E/S wildlife and plants, cultural resources, tribal concerns and how you have addressed them, water, sediment, air quality, geological substrate including if it includes any toxic materials such as naturally occurring asbestos (blue colored water is often formed by the leaching of copper or nickel from the rocks).
* A full discussion of the elements of non-significance (40 CFR 1508.27)

Significantly as used in NEPA requires considerations of both context and intensity:

(a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action.

For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

(b) Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:

(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

(2) The degree to which the proposed action affects public health or safety.

(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

(4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

(6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

(8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

Thank-you for the opportunity to comment on this project.

