27 May 2021

TO: Darren Cross, District Ranger, McKenzie River Ranger District, Willamette National Forest

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

**Subject: Tamolitch Pool Draft Environmental Assessment — comments**

Please accept the following comments from Oregon Wild concerning the Tamolitch Pool Project. 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. We work to protect special places, defend and restore Oregon’s forests and waters, and help native species thrive. Recreation, management of fish and water quality, and management of Wild & Scenic Rivers are important to us and pertain to this project.

We are aware that the project that was initially scoped in 2018 as a parking lot improvement project has been dramatically changed after hearing from the public and internal specialists. The proposed action in the Draft EA seeks to address numerous issues - from being a better neighbor to EWEB, to addressing damage caused by user-created trails, to dealing with public safety and protecting threatened fish habitat.

Specifically, the proposed action alternative involves:

* Constructing a new three-acre parking area for 100 cars, including four toilets, picnic tables, signage, and a fee station.
* Decommissioning the current two-mile trail on the west side of the river and build a new three-mile trail on the east side.
* Tamolitch Pool would be closed to swimming and guardrails (using natural materials) would be put up around cliff edges. A toilet would also be added near the pool.
* Traffic and infrastructure improvements would be made, including gating old roads, adding signage, adding a highway turn lane, and adding a helicopter landing site for search and rescue access.
* Designated dispersed camping sites would be added along the new trail.

We understand the difficult balance the Forest Service is seeking in this project and generally support the stated purpose and need. Certainly, there are benefits to better regulating human use in this special place, and the draft EA makes some good arguments for the benefits of this proposal to human safety, water quality, and fish habitat.

Public safety issues will be better addressed through the better regulated parking area; more toilets and trash bins should help with the issues of human waste and garbage; and safety and access around the EWEB facility would be improved. A ban on swimming and adding barriers around the pool area will, in theory, lead to fewer people being injured, and allow fragile vegetation to recover after years of trampling on unofficial trails. Instituting a parking fee will hopefully help the Forest Service pay for needed maintenance and enforcement at the area. Moving people out of the floodplain and streamside areas will help threatened bulltrout.

However, we do have some concerns that we feel the EA and subsequent implementation plan need to address, including analyzing the direct, indirect, and cumulative impacts to botanical, wildlife, soil, forest structure, invasive plants, fire and fuels, and heritage resources. While the Project Design Features in the EA seek to address many of the impacts the project may have, they are not an adequate substitute for an analysis of those impacts.

Other specific comments and concerns we have include:

* Does the USFS have sufficient funding to implement this project? In particular, does the agency have funding for continued maintenance, enforcement, and public education that will make this project a success? We encourage the agency to have a solid plan, including partnering with the public and other organizations, to ensure success.
* While the analysis in the EA for recreation is pretty thorough, we feel that it should better analyze how the user experience will change, and what the impacts of this will be. For example, how will having a designated camping area near the trail impact trail users? How will the experience change with a more difficult trail, especially when many people visiting the area are not experienced hikers? What are the impacts on accessibility for the whole trail (as opposed to the short Universally Accessible portion)?
* The EA should address what on-the-ground impacts the building of a new trail will have. In particular, how will building switchback trail sections on steep slopes impact vegetation and erosion? Relying on the Project Design Features instead of doing this analysis is inappropriate.
* This area is incredibly popular and used by local residents as well as mountain bikers, through-hikers, and day visitors from all over the world. For a large-scale project such as this, the Forest Service should involve the public at all stages of planning and implementation to ensure that accurate information is being shared and to respond to public suggestions and concerns.
* One of the things that makes this area of the McKenzie River so popular is the forest that lines the river and trails. Construction of the parking lot and trail should be done to without cutting any large, old trees that offer such an important scenic and wildlife resource. The proposal seeks to minimize such cutting, but we’d like to see a more stringent standard for retention.
* Additional trail signage will be important to inform trail users about the changes and to prevent use of the old trail. Considering other trail management options for the area could also help disperse use, like opening the existing mountain bike trail to through-hikers on the McKenzie River Trail. Is there a plan for funding and implementing such signage or assessment of trail use?

Each substantive issue discussed in these comments should be (i) incorporated into the purpose and need for the project, (ii) used to determine if the NEPA alternatives appropriately balance tradeoffs in different ways, (iii) carefully analyzed and documented as part of the effects analysis, and (iv) considered for mitigation.

Sincerely,



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