Data Submitted (UTC 11): 8/27/2019 7:00:00 AM First name: Erik Last name: Fernandez Organization: Oregon Wild Title: Wilderness Program Manager

Comments: Here are a few brief comments from Oregon Wild regarding the new Wild and Scenic Rivers plan. In general there is a lot to like in the plan. Our comments below primarily are regarding the adjustments to corridor buffers that were made. In general we appreciate many of the adjustments that were made and agree with the logic used. There are a few exceptions:

Most rivers: The upper ends of most rivers have a straight line edge rather than a .25 mile rounded buffer around the headwaters of each stream. It should be the latter. The act protects a buffer around the rivers on all sides, including the "top" side.

Fifteenmile Creek: The headwaters stretch of the river has a larger buffer within the Wilderness than outside(north side of river) the Wilderness. We recommend the opposite. As noted in other stretches of other rivers, the Wilderness designation adequately protects the ORVs whereas the non Wilderness lands do not. In other words the buffer in the headwaters stretch should be skinnier through Wilderness and wider outside of the Wilderness in order to better protect the ORVs.

Fish Creek: The lower stretch of the river (near the confluence with the main stem Clackamas River) should be modified. This stretch overlaps the existing buffer for the Clackamas Wild and Scenic River, thus there is no benefit to widening the buffer here. Instead we suggest a skinnier buffer there and a wider buffer upstream from the existing Clackamas buffer.

Middle Fork Hood River: This buffer is drawn to heavily favor inclusion of the lava fields. While this is logical to some extent we encourage a more modest inclusion of the lava fields and more riparian habitats on the west side of the river.

East Fork Hood River: This boundary very suspiciously gets very skinny near where it overlaps with the Polallie Cooper logging project. This stretch of the river is very scenic and should have a correspondingly adequate buffer of at least .25 miles.

South Fork Clackams River: The lower end of the river is well drawn so as to include the significant and important confluence with Memaloose Creek with a wider buffer. The upper terminus excludes the BLM lands in section 12 inappropriately. These lands should not be excluded arbitrarily.

Thank you for considering these suggestions and comments.

Erik

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