

Data Submitted (UTC 11): 2/7/2022 10:01:02 PM

First name: David

Last name: Tvedt

Organization:

Title:

Comments: Overall, I agree with and support most of your draft proposal. There are several issues that I want to raise concerns about in this draft.

The first is with the projected visitor volumes to the Devil's Staircase waterfall and to The Dark Grove. From our experience being to these sites many times, we think the projected visitor volumes would result in very visible and follow-able social trails that in themselves could lead to increased use on these now more follow-able social trails. The route in to the Dark Grove is rugged enough that this may never be a problem and visitor volume never gets to this point. With the waterfall, it seems like most visitors are coming in off the Steampot eastside road access, reaching the creek, and reaching the falls via wading the creek. This creek wading to the falls will have an as yet unknown impact on at least this portion of the Wasson Creek drainage and could need intervention in the future to lessen negative impacts.

Another concern is with the vague language regarding dealing with invasive species found within the wilderness boundaries. The two publications cited in this draft for guiding the U.S.F.S and BLM in responding to these invasive species are not readily available to the public and it leaves it very unclear what policies about handling invasive species within the wilderness boundaries will be. This needs to be spelled out much more clearly instead of this: * Treat invasive plants and host species for invasive forest pathogens in accordance with the Records of Decision (RODs) for the Northwest Area Noxious Weed Control Program Environmental Impact Statement and the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in Oregon Environmental Impact Statement (USDI BLM 2010b).

-While I support attempts at controlling invasive species in general and also within wilderness area, these "attempts" can sometimes end up in creating more harm than the invasives themselves. This is especially true with the use of herbicides in controlling invasives. Herbicide use within wilderness areas is very questionable and controversial and I think should be kept to an extreme minimum, if used at all. Please support either a no use of herbicides, or an extremely limited judicious use of them within the wilderness boundaries, and then only along closed off roads within the boundary. Please clarify your policies on this issue very clearly and publicly as to your intent with using herbicides within the wilderness and also how "aggressively" invasive species will be countered.

Also:In your category: Ecological and Botanical Effects Analysis Wasson and Franklin Creeks Comprehensive River Management Plan 21, here:* Maintain or restore natural processes, native species composition, and vegetation structure in natural communities through actions such as applying prescribed fire, thinning, removing encroaching vegetation, treating non-native invasive species, retaining legacy components (e.g., large trees, snags,and down logs), maintaining water flow to wetlands, and planting or seeding native species.-In this paragraph, these specific activities listed should be removed from this: applying prescribed fire, thinning, removing encroaching vegetation,... -Prescribing fire in this ecosystem doesn't fit the fire history of the area. "Thinning" should never happen in designated Wilderness areas, and likely the same for "removing encroaching vegetation..."

-Also, these two plant community groups either don't exist in the Wasson and Franklin Creek drainages, or are exceedingly rare and are not "appropriate" for these two creek drainages: * Manage mixed hardwood/conifer communities to maintain and enhance oak (*Quercus* spp.) persistence and structure by removing competing conifers, thinning, and prescribed fire, to the extent consistent with management direction for the land use allocation.* Manage mixed conifer communities to maintain and enhance ponderosa, Jeffrey, and sugar pine persistence and structure by removing competing conifers, thinning, and applying prescribed fire, to the extent consistent with management direction for the land use allocation.