

TO: Jim Knibbs/Chattooga Planning Team
USDA Forest Service
4931 Broad River Road
Columbia, South Carolina 29212

FROM: Chattooga Conservancy, Inc.
8 Sequoia Hills Lane
Clayton, GA 30525

October 22, 2014

RE: Chattooga River Boating Access, Comments on Environmental Assessment

To All Responsible Officials,

We write to comment on the Environmental Assessment (EA) released by the Supervisor's Office of the Sumter National Forest, entitled Chattooga River Boating Access, dated September 26, 2014. These comments are submitted on behalf of the Chattooga Conservancy, a nonprofit conservation organization whose mission is to protect, promote and restore the natural ecological integrity of the Chattooga River watershed in harmony with a healthy human environment. The Chattooga Conservancy has many members who use and enjoy the national forest lands in the upper Chattooga River watershed and the unique natural and cultural resources housed there.

We submit these comments with the caveats that the Chattooga Conservancy believes that the three Decision Notices and Finding of No Significant Impact for the Environmental Assessment, "Managing Recreation Uses in the Upper Segment of the Chattooga Wild and Scenic Corridor," are deeply flawed. We feel strongly that the 2012 decision failed to consider inevitable negative impacts to the sensitive, rich biological environment of the Upper Chattooga River and to the increasingly rare backcountry experience in the Chattooga River watershed. Nonetheless, this decision has withstood legal challenge and is now in effect. Ironically, the 2012 decision to pre-approve access in all reaches of the upper Chattooga has resulted in only two alternatives offered to the public for consideration in the purported "site-specific" Environmental Assessment of Boater Access in the Upper Chattooga River.

We believe that the EA for Chattooga River Boating Access is deeply flawed and, if implemented, it will inevitably cause irreparable damage to the unique backcountry experience and to the biophysical environment in the headwaters of the Chattooga River. Specifically, we believe this to be true for the following reasons: 1) The Boater Access EA contains a procedural

“tiering” defect which renders the proffered alternatives non-viable; 2) the EA fails to consider an adequate array of alternatives and provides no justification for this failure; 3) the EA is based upon insufficient information and data and fails to address other “connected” actions; 4) the EA misrepresents its scope of analysis; and, 5) the EA violates the Wild and Scenic Rivers Act (WSRA) and the Wilderness Act. We assert that these oversights constitute violations of the National Environmental Policy Act (NEPA), the Administrative Procedures Act (APA), the Wild and Scenic Rivers Act (WSRA) and the Eastern Wilderness Act.

I. A Substantial Procedural Defect is Contained in the Boater Access EA Concerning the Lower Bullpen Bridge Trail Which Effectively Renders the Alternatives Completely and Comprehensively Untenable

The 2012 Decision and Finding of No Significant Impact for Recreation Uses in the Upper Chattooga River (“the 2012 EA”) was a “programmatic” NEPA document in that it was geared towards analyzing and identifying the environmental impacts of a broad management regime—recreational use in the Chattooga’s headwaters—as a whole. The Forest Service then purported to “tier” this initiative by implementing additional NEPA analysis of Alternative 13A, the course of action that was selected in the 2012 EA, at “site-specific” locations. While Courts have held that it is, at times, preferable to defer the detailed analysis of site-specific impacts until a “specific development action is to be taken,” the “site-specific” analyses contained in the Boater Access EA exceeds the scope of actions that were made permissible under the 2012 EA. *Resources Ltd., Inc. v. Robertson*, 35 F.3d 1300, at 1306 (9th Cir. 1993). Specifically, the 2012 EA explicitly permits five (5), and only five (5), boater put-in and take-out points to be designated at the following locations: Green Creek, Norton Mill Creek, Lick Log Creek, Bullpen Bridge and Burrells Ford bridge. Peculiarly, however, in the Boater Access EA, there are six (6) boater access points/trails proposed, as the Forest Service has added the lower Bullpen Bridge trail. This additional trail is simply unauthorized under the terms of the 2012 EA and, more importantly, raises a wealth of NEPA infractions.

The 2012 EA contains required NEPA analyses of the direct, indirect, and cumulative effects of Alternative 13A. Accordingly, the legality of the “tiered” decisions contained in the Boater Access EA is inextricably dependent upon the NEPA analysis contained in the 2012 EA regarding direct, indirect and cumulative impacts. Because the lower Bullpen Bridge trail was not mentioned in the 2012 EA, however, its direct, indirect and cumulative impacts were never assessed. To make matters worse, these impacts were not analyzed in the Boater Access EA either. Thus, as it would turn out, there are a wealth of presumptions made in the Boater Access EA that are baseless. For example, the Forest Service attempts to show that each of the proposed boater access trails/sites, including the lower Bullpen Bridge trail, are compatible with an existing Recreational Opportunity Spectrum (ROS) inventory by referencing the proposed trails, access sites and capacities established in the 2012 EA. Because the proposed lower Bullpen trail was not included in the 2012 EA, however, it cannot be said that the allegedly comprehensive ROS analysis is, in effect, being satisfied.

In short, the impacts of the lower Bullpen Bridge trail have not been addressed by the Forest Service. While NEPA does not require an agency to select particular courses of action, it does require that certain impacts of a proposed action—namely, the direct, indirect and cumulative impacts—at a minimum, be considered. Failure to make this consideration, therefore, is contrary to legal mandate and, as such, constitutes an abuse of the Forest Service's discretion.

There is also a broader and undoubtedly more substantial concern that arises in connection with the Forest Service's proposal to designate the lower Bullpen Bridge location. Having determined that the trail itself would be unlawfully designated if it were in fact designated, the question remains how this might impact the entire Boater Access EA. The Boater Access EA restricts the available alternatives to either an "action" or a "no action" course of action. Thus, because the lower Bullpen Bridge location cannot legally be proposed and/or designated under NEPA, the "action" alternative is not only non-viable, but legally impossible. There are two opposite consequences that surface from this realization. On the one hand, this would indicate that none of the trails could be designated, since the Forest Service has remained insistent on its "all or nothing" approach to the boater access trails. On the other hand, as will be discussed below, the alternatives proffered in the Boater Access EA are inappropriate given the circumstances, and do not constitute a hard look at the impacts of the proposed action.

II. The EA is Deficient Because it Fails to Consider An Adequate Array of Alternatives and Provides No Justification for the Selected Alternatives

The "all or nothing" approach set forth in the Forest Service's Environmental Assessment—that is, either all the boater access trails and sites will be designated or none will be so designated—effectively reduces discussion of other environmentally sound alternatives to a false "yes," or "no," dichotomy. This oversight is in breach of the regulatory requirement that an environmental assessment contain a "brief discussion ... of alternatives ... [and] the environmental impacts of [those] ... alternatives." 40 C.F.R. §1508.9. While we do not disagree with the Forest Service's inclusion of the action and inaction alternatives in its assessment, the inference that these alternatives alone are sufficient to satisfy NEPA's procedural requirements is the precise kind of agency solipsism that has been met by a skeptical glare from the judiciary.

The Sixth Circuit Court of Appeals, for example, has explicitly stated that an environmental assessment may not discuss the "yes and no" alternatives of an action and no action without at least exploring other alternatives. *Save Our Cumberland Mountains v. Kempthorne*, 453 F.3d 334, at 345-46 (6th Cir. 2006). As was stated by the Seventh Circuit, moreover, while discussing an EA's required alternatives analysis: "if an even less harmful alternative is feasible, it ought to be considered." *River Road Alliance, Inc. v. Corps of Engineers*, 764 F.2d 445, at 452 (7th Cir. 1985). The question is whether the agency has taken a "hard look" at a reasonable range of alternatives and further explained its reasons for rejecting them. See *Baltimore Gas & Electric Co.*, 462 U.S. 87, at 97-98 (1983). Because the Forest Service has failed to consider an obviously feasible and less harmful alternative—namely,

designating only those proposed trails and access points that have actually been used by boaters and not designating those that have rarely been used by boaters and which risk substantial environmental disruption—it cannot be said that they have adhered to this requirement.

The “all or nothing” alternatives dichotomy, more particularly, is not appropriate given the current status of several of the proposed access points. For example, there are compelling reasons not to designate the County Line and Greens Creek Trails: 1) There was a sharp decline in the number of boaters who used the Greens Creek Trail between the 2012-13 and 2013-14 boating seasons; 2) there were no documented boaters who used the County Line trail during the first two official boating seasons; 3) boater use of the County Line trail is expected to remain the same -- essentially nil -- into the future, and for the Green Creek trail is expected to taper off or remain the same into the future; and, 4) the Chattooga Cliffs reach is the most biologically sensitive area and least used section in the entire Chattooga River Corridor, and enhancing boater and multiple use access to this precious environment has un-explored potential to seriously diminish its rare ecological features.

On the other hand, there are several compelling reasons in support of designating the upper Bull Pen Bridge and Burrells Ford access points: 1) Given the above information, they are both likely to be the primary boating access points; 2) the whitewater floating between these locations is far superior to that of the Chattooga Cliffs; and, 3) both locations are in need of officially designated boater access trails due to the high volume of user-created and “spur” trails. Clearly, then, there are considerations that are particular to each of the proposed sites, which require each proposed access point to be independently assessed.

An action is “arbitrary and capricious,” within the purview of the APA, when the agency fails to consider the “relevant factors and articulate a rational connection between the facts and the choices made.” *Baltimore Gas & Electric Co. v. Natural Resources Defense Council, Inc.*, 462 U.S. 87, 105 (1983). In consideration of the above information, it is apparent that the Forest Service has failed to so consider each of the “relevant factors,” and, moreover, has failed to establish a “rational connection” between the demonstrable needs to designate *some* boater access trails and to refrain from designating others and its “all or nothing” approach.

III. The EA is Deficient Because it is Based Upon Insufficient Information and Does Not Adequately Consider Other “Interconnected” and “Inter-related” Uses

Again, “[a]ccurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA,” and the information contained in a NEPA document, including an environmental assessment, must be of “high quality,” and “concentrate[d] on the issues that are truly significant to the action in question. 40 CFR 1500.1(b). Accordingly, in light of the general lack of monitored “other uses” during the previous two boating seasons, it is questionable as to whether future use trends have been accurately, or even realistically, predicted in the Boater Access EA. The Boater Access EA itself states that, “[t]he Forest Service has not yet implemented a comprehensive use monitoring program, although a request for monitoring

proposals is planned for 2015.” Monitoring boater use as well as “other uses” is critical to crafting viable alternatives for managing recreational uses in the headwaters, especially in light of the admissions that some of the proposed boater access locations are currently, and will continue to be, used by “other users.” This informational gap greatly hamstrings the Forest Service’s ability to adhere to NEPA’s procedural requirements.

In addition, CEQ Regulations provide that “connected actions”—actions that are closely related or interdependent, actions that “automatically trigger” other actions that may require NEPA analysis, and/or actions that cannot or will not proceed unless other actions are taken previously or simultaneously— should be considered in a single NEPA document. 40 C.F.R. 1508.25(a)(1); *see Hammond v. Norton*, 370 F.Supp. 2d 226, 247 (D.D.C. 2005). The Boater Access EA mentions on pages 7-8 that other users will have their access to the river enhanced as a result of the proposed boater access trails. Without the proposed boater access trails, this seems to indicate, other users would not have their access to the river enhanced. As such, access for other users and boaters are “connected actions” within the purview of CEQ Regulations and, as such, should have been considered together in a single environmental assessment that is tailored towards river access for all recreational users, not just boaters.

IV. The EA Misrepresents the Scope of Analysis, Thereby Depriving the Public of the Information Necessary to Make Informed Decisions About the Proposal

In releasing the Chattooga River Boating Access Environmental Assessment (the EA) for public commentary, the US Forest Service, pursuant to the National Environmental Policy Act (NEPA), is required to provide information that is sufficient to ensure informed decision-making and public participation. 42 U.S.C. 4332. Because “[a]ccurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA, ”this information must be of ‘high quality,’ and, [m]ost important[ly] must concentrate on issues that are *truly significant* to the action in question.” 40 CFR 1500.1(b) (emphasis added). Because it is apparent that the designation of the County Line trail is entirely unrelated to the core objective of the EA — namely, that boater “put-ins and take-outs, and access routes to and from,” be designated — a proposal to do so is not “truly significant” to this objective and is, accordingly, not warranted. There are several reasons that are readily observable in support of this position.

Primarily, it is unlikely that the proposed County Line trail would be used by boaters at all. In fact, over the course of two consecutive boating seasons, there was not one boater documented as having used the County Line trail. This is not surprising in light of the fact that the trail is 1.2 miles in length, thereby requiring boaters to carry their boats a significant distance across a rugged and uneven terrain. What is surprising, however, is that the Forest Service seems aware of this realization. On page 7 of the EA, which is, at the risk of repetition, a document entitled “*Chattooga River Boating Access*,” the Forest Service justifies the designation of the County Line trail by stating that the trail is currently used by “other users.” True as this may be, the EA was not prepared to address trails for “other users.” Instead, it was prepared to address

boater access, and, pursuant to NEPA, must be focused on issues that are “truly significant” to that action. 40 CFR 1500.1(b) (emphasis added).

This misrepresentation aside, the Forest Service has provided no meaningful assessment of how the proposed designation of the County Line trail will impact the Outstandingly Remarkable Values of the Chattooga Cliffs Reach and its included backcountry experience, nor do they address the biophysical effects of probable increased use by “other users” due to the development and designation of the County Line trail. Again, one of the primary goals of NEPA is to ensure that sufficient information is available so that informed public participation can occur. 42 U.S.C. 4332. With the disjointed and deficient information provided concerning the County Line trail, however, it cannot be reasonably expected that a member of the public would be able to understand and make informed decisions about the potential threats to the same features that justified the Chattooga River’s designation as America’s 12th Wild and Scenic River.

By proposing the designation of the County Line trail -- a trail that affords no apparent advantages to boater access on the Chattooga -- in a NEPA document that is dedicated specifically to assessing boater access, the Forest Service has misrepresented the scope of the EA. Moreover, the Forest Service has failed to provide the public with the information necessary to foster informed participation with the designation of the County Line trail, and, most importantly, has failed to show a “rational connection” between the facts and the decision to propose designation of the trail. *Id.* For these reasons, we believe that the Forest Service has acted arbitrarily and capriciously.

V. The EA Violates the Wild and Scenic Rivers Act (WSRA) and the Wilderness Act

Construction of the proposed trails and access points is contrary to the Wild and Scenic River Act’s (WSRA) mandate that the Chattooga’s Outstandingly Remarkable Values (ORVs) be “protect[ed] and enhance[d],” and that uses which would “substantially interfere” with these values be limited. 16 U.S.C. 1271. While recreation is considered to be one of the Chattooga’s ORVs, it is not the only one. Moreover, the WSRA makes it mandatory for the Forest Service to place “primary emphasis” on a river’s “esthetic, scenic, historic, archaeological, and scientific features,” in its administration of the river. Promotion of the river’s recreational values alone, stated differently, cannot detract from the WSRA’s overall directive that Wild and Scenic River segments be managed so that each ORV is protected and enhanced. *Wilderness Watch v. U.S.F.S.*, 143 F.Supp.2d 1186, 1205 (D. Mont. 2000). Because the Forest Service’s proposal would pose direct and substantial interferences with the Chattooga’s ORVs and because the trails would not enhance these ORVs, the proposal is inconsistent with the WSRA, thereby in violation of the APA.

The ORVs that were responsible for the Chattooga’s designation as a WSRA segment, and which the Forest Service should “protect and enhance,” includes history, geology, recreation, scenery and biology. The WSR Report prepared by the Forest Service indicates that the Chattooga Cliffs reach is an area that is “in a near natural condition,” which includes “some

beautiful whitewater,” but that it “should not be floated.” There are also some rare and precious biological ORVs that thrive in this area including nine species of sensitive or locally rare animal species and a wealth of rare plant species that are endemic to the Southern Appalachians. Designating boater access trails to the extent of that proposed, therefore, would “substantially interfere” with these ORVs because it would allow increased access to conditions that have only been able to exist because of their remoteness and seclusion.

Additionally, designation of the proposed trails to the extent of that proffered by the Forest Service would not enhance the Chattooga’s recreation ORVs because, in actuality, they would deplete them. Over the last 35 years, to be more particular, access points within the Chattooga’s headwater corridor near the Chattooga Cliffs and Rock Gorge reaches have been very limited. During this time a unique and secluded backcountry fishing experience has ensued. Additionally, other recreational activities, including scenic viewing, wildlife tracking, photography, hiking, trail running and wildlife viewing have also resulted from this distinct sense of seclusion, isolation and solitude. Designation of the proposed boater trails to the extent of that set forth in the EA, specifically in reference to the Green Creek and County Line Trails, would reduce the ability for these other users to partake in these distinctive recreational experiences because the trails would make remote and secluded portions of the Chattooga more accessible. Moreover, in light of the fact that many of these other recreational uses have been pushed into the headwaters precisely because of the overuse of the lower portions of the river, this form of degradation has potential to be severe as these other users would have nowhere else to go.


Designation of the proposed boater trails to the extent of that proffered by the Forest Service would also not enhance the Chattooga’s recreation ORVs because any advantages to boaters would be minimal. It is apparent that boaters are already able to reach the headwaters without official boater access trails. In addition, as was stated in the EA, “[b]oating is likely to remain low given the use levels that have occurred so far.” The WSR report, perhaps most importantly, that addresses the Chattooga’s headwaters concluded that only some portions of the headwaters were ideal for floating and, more specifically, that the Chattooga Cliffs reach contains “hazardous whitewater that should not be floated.” There are also other considerations, such as a log jam extending across the entirety of the river .25 miles below the Norton Mill Creek access point and the presence of a major boating access point beneath the Lick Log Creek proposed location, that raise serious questions as to the necessity of the extent of the proposed trails and whether they would really enhance recreation.

The EA’s proposed action violates Section 2(c) of the 1964 Wilderness Act which defines Wilderness as, “an area where the earth and its community of life are untrammelled by man... retaining its primeval character and influence... and which generally appears to have been affected primarily by the forces of nature with the imprint of man’s work substantially unnoticeable.” Public Law 88-577. The Upper Bull Pen Trail is completely sufficient to providing access to boaters. The Forest Service proposes to construct a second access point further downstream in the Ellicott Rock Wilderness Area: “For boaters that do not wish to put-in and immediately experience a highly technical section of whitewater, the Forest Service would

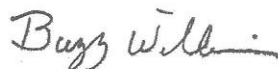
construct a foot trail (less than 300ft. in length) below the bridge to the lower Bull Pen put-in on river left to get paddlers off Bull Pen Road, down the road bank to the river." FSR 1128. This proposed lower put-in would be constructed in the Ellicott Rock Wilderness Area. Although trails are allowed in wilderness areas they must not significantly diminish the qualities as defined in Sec. 2 (c) of the Wilderness Act. The construction of a trail into the Ellicott Rock Wilderness would attract more users into an already heavily used eastern wilderness, and would cause harm to the wilderness experience and cause harm to many rare species of plant life in the spray zones immediately located in this area. Constructing a trail into a wilderness area at a place where adequate access already exists for the purpose of getting boaters off the road and for the "convenience" of providing a put-in for boaters to avoid putting in where "highly technical water" exists at the Upper Bull Pen put-in is not a sufficient reason to risk degrading the wilderness area immediately below.

For the foregoing reasons, the Chattooga Conservancy believes that the Boater Access EA is a flawed document. Generally speaking, in conclusion, we feel that it is not supported by the requisite statutory, practical and common-sense analyses. We also feel that moving forward with the Boater Access EA, as it stands presently, would constitute an abuse of the Forest Service's discretion. With this in mind, therefore, we ask that the Forest Service select the "no action" alternative so that the proposed action can be reconsidered in light of a more thought out and complete range of alternatives and additional monitoring and evaluation. In addition, we ask that the mandatory procedural requirements be completely satisfied.

Sincerely,



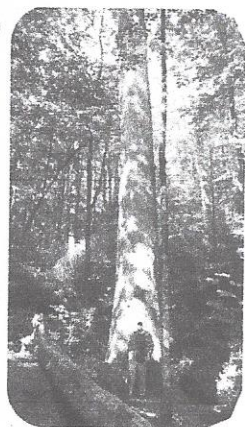
Nicole Hayler, Executive Director



Buzz Williams, Chairman of the Board

The Bob Padgett Poplar

To find this tree turn right onto Rich Gap Road about 4 miles out of Highlands off Horse Cove Road.



Park on left 1/4 mile after turning. Tree is across road on right.

OUR FAVORITE BACK ROAD IN HIGHLANDS



This 9 mile long dirt road takes you deep into the backcountry. You will pass near Granite City, see a privately owned waterfall and then cross over the wild and scenic Chattooga River at the Old Iron Bridge. A great swimming and fishing area.

Directions : From downtown Highlands, at the light where 64 elbows and 28 heads south. Go east on Main Street through the shopping district. You will go past the library and nature center. Main Street then turns into Horse Cove Road. Follow Horse Cove down and around for 4.6 miles to the Junction with Bull Pen Road on right and Whiteside Cove Road which runs straight. *Note : at 3.7 miles you will pass Walking Stick Road. If you take a right there you can drive down and see a private waterfall on your right. This is also the back way in to Secret Falls. Go 3 miles down Walking Stick turn right onto Forest Road 4567, then .2 miles to Big Shoals parking on left.*

Bull Pen Road

Turn right onto Bull Pen Road and reset your odometer.

1.0 miles....Slick Rock Trail on right. A short trail of .3 miles leads to some interesting rock formations and scenic views.

1.2 miles.... Ammons Branch Campground.

1.7 MilesEllicott Rock Trailhead. We have not hiked this long trail. It will eventually take you to Ellicott Rock. This rock marks the boundary of three states, NC, SC and GA. It's a fairly long complicated hike. If you are planning on taking this on, we suggest you get some trail maps and better directions in Highlands or on the internet.

3.0 miles ...Overflow parking for Iron Bridge Area on right.

3.0.....The Old Iron Bridge. This area has a lot to offer. There are two parking spaces on left just before you cross over the bridge. If you are lucky one will be available. A nice trail runs upstream and along the river for a mile or so. Great beach areas and swimming here. Also, the fishing around here is some of the best we've found. They call this area The Potholes. If you look down at the river from the bridge you will see why. If you are a little nuts (like I was to get the above shot) there is a real steep trail just past the bridge on your right that takes you to a nice rock where I was standing. This trail is not for children or the timid. Actually it's not really a trail just a hill scramble.

3.6 miles ...Parking area on right with trails to the river.

8.5 miles.... Junction with 107. Left will take you to Cashiers and Silver Run Falls (2.9 miles up). Right will take you to Whitewater Falls (left on Wington, then left on 281). There is also a nice area along the Chattooga River off of Whiteside Cove Road near Cashiers.



Bonus Area

Granite City

If you want to explore some rock outcroppings, house sized boulders and caves, this is your spot! Not a place for the faint of heart or small children, but teenagers love this. The trail is short but very steep.

Directions: Follow directions above to Whiteside Cove Road. Instead of turning right on Bull Pen Rd stay straight on Whiteside for 1.2 miles to small parking area on left. You will see a trail to your left and one going straight uphill, along a washed out creek bed. Take this one straight up the hill for about 6 minutes. You will come to a ravine. If you take the trail through the ravine to the left you will find numerous places to explore. We assume you can find a way that brings you out on the other trail to the parking lot but we haven't accomplished that. Watch for snakes here in the warmer months.

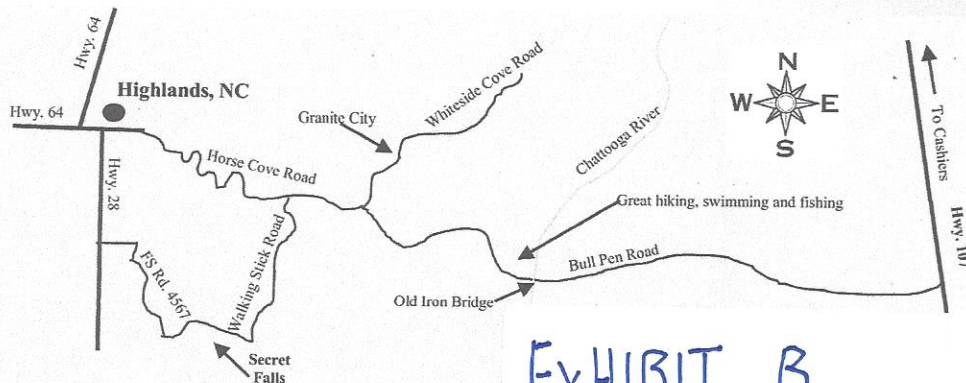


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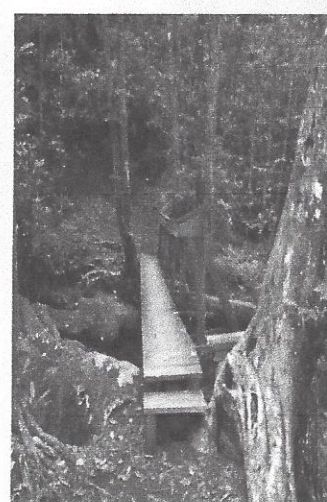
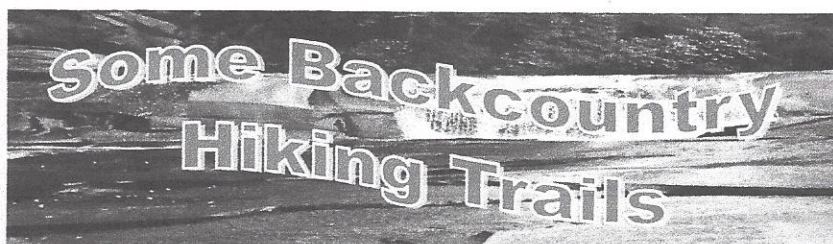
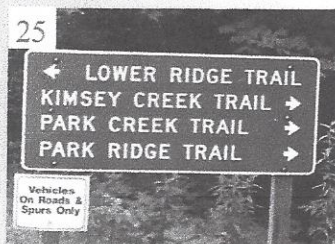
The
**Lost
Hiker**

Highlands, North Carolina



This map is not exactly to scale see above d

EXHIBIT B



"It's not the mountain we conquer but ourselves."
Sir Edmund Hillary

"Thousands of tired, nerve-shaken, over civilized people are beginning to find out going to the mountains is going home, that wilderness is a necessity..."
John Muir

There are so many places to hike and explore in this area. Two of the most challenging and famous are the Appalachian Trail and the Bartram Trail. Step onto either of these and you can hike as far and long as your legs will carry you. We list some access points for these as well as some of the more remote local favorites. Take your time, breathe in the fresh mountain air and listen to the sounds of nature.

Franklin Area

Waslick Poplar Trail: This trail takes you down to one of the largest poplar trees in the country. Unfortunately, it is dead now but still an impressive sight. From the parking area take the trail down to your left then switch back to your right. After 1/2 mile you will cross a creek. It's a short walk past this to the tree.

Albert Fire Tower: A great 360 degree view: One of the finest around. From the parking area at end of road walk straight out for 1/4 mile. Take a right on the Appalachian Trail and go 1/3 of a mile uphill to the tower. This last part is steep so be prepared. See page 17.

Pickens Nose Trail: From the parking area the trail heads steeply uphill for 1/4 mile. It then bears to the right and follows the ridge another 1/2 mile to where it dead ends at a nice rock outcrop. See page 17 for roadmap.

If you are going to any of the 3 trails above don't miss the hike to Laurel Falls on the same road. It's an easy .6 miles hike to this falls.

If you are looking for a good trail close to Franklin, take the Wallace Branch Trail. You can take the trail 2 miles to Williams Pulpit a rough rocky outcrop area. If you just want a short hike, there is a little cascade about five minutes from the parking area.

Directions: From 441 in Franklin Take 64 west for 1 mile turn tight at light (Sloan Rd.) Go .3 mile and bear left onto Old Murphy Road and then immediate right onto Pressley. It's 1.7 miles to the dead end parking lot. Pressley Rd. will turn into Ray Cove but no turn is needed.

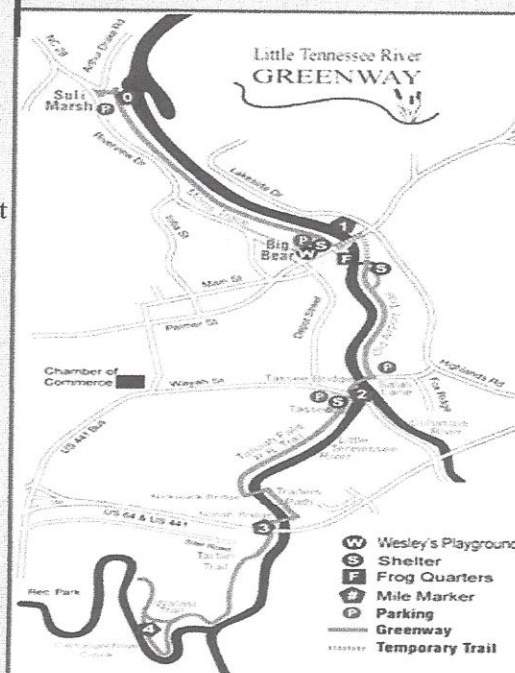
The Greenway follows the Little Tennessee River for almost five miles in and around the town of Franklin. A great place for an easy stroll. Great bike riding and some half way decent fishing are all present. Expect to see a lot of early morning joggers and strollers. Our favorite access area is right off Highlands Road behind the flea market.

Highlands Area

Whiteside Mountain: This great 2.5 mile loop climbs to the top of the mountain and a 700 foot cliff. The views are amazing if you're up for the hike. This is a designated National Recreation Trail. There is a \$2 fee for parking. Trail maps are available at the parking area. Directions: From Highlands take 64 east towards Cashiers for about 5 miles. Turn right onto Whiteside Mountain Road. Take this road 1 mile until you see the parking area on left.

River Trail by Iron Bridge: This is a great walk along the Chattooga River. Trail starts right by the old iron bridge on Bull Pen Road (see page 18). There is also access to the Chattooga River trail shortly before you get to Iron Bridge.

Sunset Rocks Trail: A short .6 mile trail leads to an overlook perfect for sunset viewing. You can pick up the trail right at the end of town across from the nature center. This is a very popular hike so expect some company.



Clayton Area

Tallulah Gorge & Steps: If you are up for the challenge it doesn't get much better than this. Take the 1,000 steps down into the gorge or hike along either rim trail. See page 4.

Chattooga River Trail and its spurs runs over 50 miles from NC. to GA. A good access point is right off Hwy 76, 8.3 miles east of Clayton. Park at the river access area on left just after you cross the river. Take the steps down to the Hwy and then cross along the bridge. Pick up the trail on the other side and you can follow it north as far as you want. See page 8 for more to do on Hwy. 76

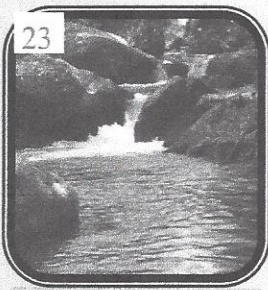
Black Rock Lake: If you want a nice peaceful easy walk, the 3/4 mile trail circles the lake as it crosses a couple bridges and creeks. For directions see Sylam Mill Falls box on page 5. Some other nice trails are in and around Black Rock Park, but these are more crowded.



The Appalachian Trail can be accessed 10.3 miles west of Franklin; right on Hwy 64 at Winding Stair Gap. Also off the Standing Indian drive see page 17.

The Bartram Trail crosses Hwy 106. It's 5.8 miles south of Highlands. Another access point is off Warwoman Road 2.9 miles east of Clayton. Many more access points exist.

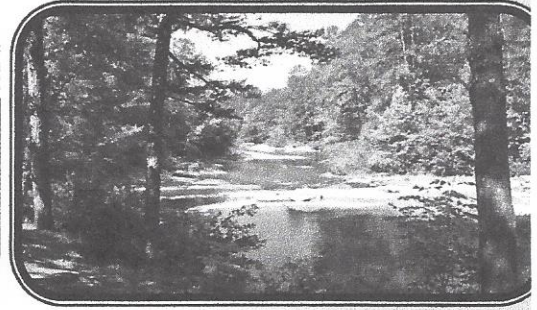
If you plan to hike far on either of these long trails, we suggest you pick up a trail map at a visitor center or local outfitter.



Fish to taste good, must swim three times. In water, in butter and in wine.

Proverb

The Best Fishing Spots We Have Found



Whether it's trout, bass or catfish you're after, this area abounds with opportunities. Some of our favorite spots are listed below. They have good access and most are remote and less fished than the normal touristy spots. Our favorite, and one of the least crowded, is Needmore Rd. north of Franklin. Many miles of dirt road riverside driving gives you ample places to try your luck. Another great spot is the Iron Bridge area southeast of Highlands. Near Clayton try the Sandy Ford Rd. access or Coleman River for trout. See below for more info and good luck.

Franklin Area

Needmore Rd: Take 28 north from Franklin 11.8 miles; turn left on Tellico Rd. Go 1.2 miles turn right on Needmore Rd. This road takes you along the Little Tennessee River for many miles of great swimming and fishing. This area is renowned for its smallmouth bass fishing and has been featured on TV shows.

Standing Indian: Great trout fishing along the Nantahala River. See page 17 for directions to the campground area.

Wayah Rd north. Take Wayah Rd. 24 miles to a great stretch of world renowned trout fishing. See page 22 for more info.

The Greenway. Many still water fishing spots good for younger children and easy access. Runs through town; look for signs to entry points. See map on page 25, or get a free map at numerous locations around town.



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275 Main St. - Highlands, NC 828-526-2157

Highlands Area

Iron Bridge: Great trout fishing in a beautiful setting. Trail runs along river with sandy beaches and boulders. Take the trail upstream right by the two parking spaces. Good swimming and lounging abound. You are sure to find many solitary secluded spots. See page 18 for directions.

Cliffside Lake: this stocked lake is always good for some fair sized trout. Take 64 west from Highlands about 5 miles to entrance on right. There is a small fee to use this rec. / picnic area.

The Cullasaja Gorge on 64 east of town has some great stretches of trout fishing. Access is tough but does exist.

River Road east of Franklin has some good access points along the Cullasaja River. Take 64 (off 441) east 2.7 miles to River Rd. Follow road 1/3 mile to a one mile stretch of the road that has many pullovers along the water.

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Clayton Area

Sandy Ford: Great fishing along the scenic Chattooga River. A dirt road takes you right to a sandy area just below a tall ledge. Wade upstream for some fine action. See page 16.

The Tallulah & Coleman Rivers: This area has some great fly fishing. Hike up into the Coleman Scenic Area for some true challenges. See page 19.

Warwoman Road: Near the end of the road 13 miles out of Clayton is a good spot on Overflow Creek. Park by the bridge or on Overflow Road. Also the first few miles of Earls Ford Road is real popular with The locals as it is regularly stocked.



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Highlights

- Historic Bridge straddles Jackson & Macon County lines over the Chattooga River
- Hiking, Simming & Fishing
- Photo Opportunity
- Great spot to visit in the Summer and Fall

The Local Scoop

If you are looking for a scenic drive to take your family or significant other on while in the Highlands area, then Bull Pen Road would be a good one to take. Take "Bull Pen Road" for 3 miles from the fork at the end of "Horse Cove Road." At 3 miles you'll find yourself at the "Iron Bridge" and the Chattooga River. The views of the river from the bridge are fantastic as the large cascade rushes underneath you. Look down river and see a smaller, cascading "Ammons Branch" coming into the river for a gorgeous setting. Use the predominant trailhead at the Chattooga River Cliffs Trail (Lower) for exploring up river. It is located on the Macon County side of the bridge at the small parking area. The evenings make great photo opportunities come to life, so bring your camera and get some great shots of the river and bridge. We recommend this location for the entire family to enjoy.

Interested in camping out in this area? There are many opportunities to do so. The nearby "Ammons Branch Campground" (you will have passed it on the way to the bridge) is an excellent location for frontcountry but "primitive" camping. Also, Bull Pen Road has other random campsites located along the roadside as you make your way towards Cashiers (NC Hwy-107). You can find them near the Iron Bridge, Scotsman Creek & Fowler Creek.

The Local Directions

From main intersection of U.S. Hwy-64/ N.C. Hwy-28 in Highlands, NC drive through main street until the road turns into Horse Cove Road (just past Mtn. Fresh Grocery on your Right). Drive for 4.5 miles until you come to a fork in the road at a brown mileage sign. Take the right onto "Bull Pen Road" for 3 miles to the trailhead at the Chattooga River and "Iron Bridge."

[Back to top](#)

Difficulty Levels

- Fishing 2/6 ?
- Hike 4 ?

Coordinates

35.015956, -83.126359

Access

Moderate via Horse Cove Road
& Bull Pen Road (Highlands)

Hike Distance

Roadside Pull-off

Bull Pen

Cashiers Guide » Cashiers Waterfalls

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moderate

Bull Pen is as much rapid as waterfall. While not the most dramatic falls in the area, this is a great place to hang out for a while and explore the Chattooga River Trail. Also, the potholes in the rock are amazing and worth the visit.

From Cashiers, drive south on Hwy. 107 for about 7 miles until Bull Pen Road (one of the few turns off of Hwy. 107), and turn right. (If you see a stone processing facility on the left, you've just passed the turn.) Follow Bull Pen Road, which quickly turns to gravel for another 5 to 6 miles until you reach a bridge. Cross and park on the right. Bull Pen is right below and upriver from the bridge. There is a trail that leads ahead from the parking area upriver and a trail down to the rocks by Bull Pen across the bridge and to the right, though this trail is a fairly steep and technical way to reach the river.

All of the upper Chattooga is worth seeing, and Bull Pen is a good starting point. Another good hike here would start at the trailhead on Whiteside Cove Road, follow the Chattooga River Trail (Hiking) downstream and end here, at the Bull Pen bridge (this would require a buddy with a car, of course and a bit of planning).

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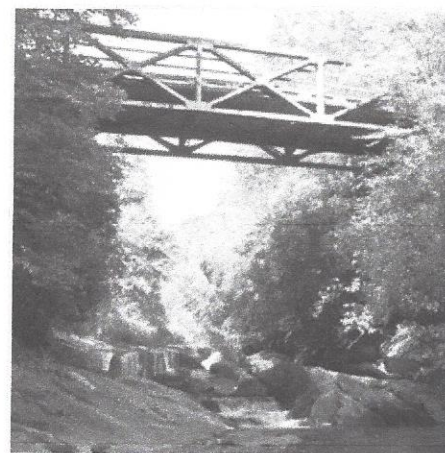
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Getting There



- [Scenic Drives](#)
- [Waterfalls](#)
- [Motorcycle Routes](#)

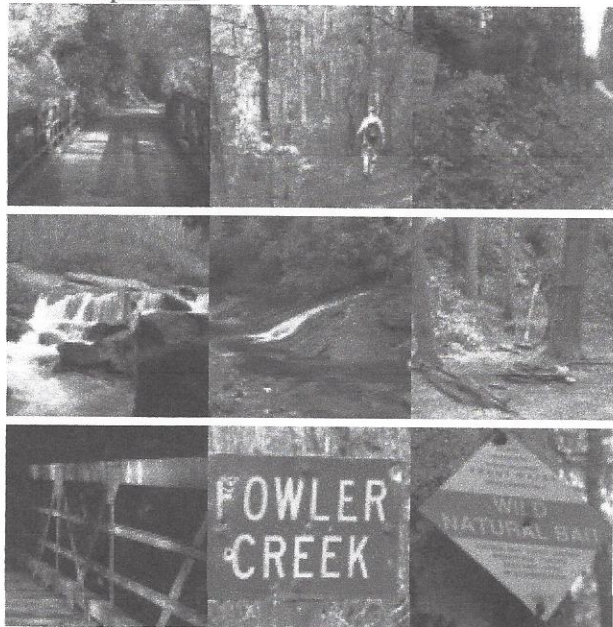


Bull Pen Road

Categories: [Scenic Drives](#), [Fall Foliage - western North Carolina](#)

[Extend Map](#)

[See all photos](#)



[Next](#) [Previous](#)

Highlights

- Highlands, NC scenic drive of 8.3 miles gravel/paved road connecting Horsecove Road and N.C. Hwy 107
- Multiple activities along this scenic and secluded road like: Hiking, Camping, Fishing & Swimming
- Access to the Wild & Scenic Chattooga River
- Gateway to "Ellicott Rock Wilderness" where 'Commissioners Rock' and 'Ellicott Rock' can be found marking where the borders of North Carolina, Georgia and South Carolina all meet in the same location

The Local Scoop

If in Highlands, NC or Cashiers, NC, we strongly recommend Bull Pen Road to the outdoor enthusiast looking to get away from it all whether it be for half day, day, or overnight trip for Hiking, Camping, Fishing and more! Bull Pen Road's secluded environment offers a relaxing and peaceful excursion through the southern Nantahala National Forest. Here are few recommended points of interest that have become some of our favorites along this route: