



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Asheville Field Office
160 Zillicoa Street
Asheville, North Carolina 28801

December 6, 2011

Ms. Marisue Hilliard, Forest Supervisor
National Forests in North Carolina
160 Zillicoa Street, Ste. A
Asheville, North Carolina 28801-1082

Dear Ms. Hilliard:

Subject: Biological Assessment for the Preferred Alternative (Alternative 13A) for Managing Recreational Uses on the Upper Chattooga River, Nantahala National Forest, Jackson and Macon Counties, North Carolina

On December 5, 2011, we received your letter requesting our comments on the accompanying subject document. We previously commented on this project in a letter to you dated December 28, 2008, a letter to the Chattooga Planning Team dated July 31, 2008, a letter to Mr. John Cleaves (USFS, Columbia, South Carolina) on September 11, 2007, and a letter to the "Chattooga River Project" (USFS, Columbia, South Carolina) dated August 23, 2011. The following comments are provided in accordance with the provisions of section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1543) (Act).

The Sumter (SNF), Chattahoochee (CNF), and Nantahala (NNF) National Forests, are proposing a change in recreation management direction for the 21-mile section of the Chattooga Wild and Scenic River upstream of the bridge traversing US 28 (Upper Chattooga River). About 70 percent of the upper Chattooga River is bordered by South Carolina on the eastern bank and Georgia on the west bank; the northernmost portion is within North Carolina.

As in previously reviewed documents, the subject Biological Assessment (BA) addresses potential impacts to the federally endangered rock gnome lichen. There are two documented populations of the rock gnome lichen in tributaries (Scotsman Creek and Fowler Creek) to the Upper Chattooga River and one population on the east bank of the Chattooga River in North Carolina, just upstream from the confluence of Fowler Creek and about 1,500 feet north of the South Carolina and Georgia border. Currently, there are no visible impacts from any current recreational usage at any of the three sites. Potential direct effects to the rock gnome lichen

subpopulation along the Chattooga River from the proposed modification of recreational activities includes trampling by anglers traversing the river, scraping of rocks by boats traversing the river at different high flows, and portaging of boats around log jams, all of which are anticipated to increase with the decline and dropping of eastern hemlock trees as a result of infestations by the hemlock wooly adelgid.

The subpopulation along the Chattooga River is partially protected under a narrow rock shelf. The physical features of the site probably have previously discouraged, and will continue to discourage, access by anglers as well as any visitation from boaters when floating this section of the river. There is no hiking trail within the vicinity of this site nor are there any trails proposed for this area. The site is not flat enough to allow a rest opportunity for boaters. If adjacent hemlocks were to fall across the river at this site, resulting in a necessary portage, the natural area to traverse would be the flatter western bank where the species does not occur. Therefore, there are no anticipated direct effects anticipated with seasonal boating proposed along this stretch of the Chattooga River. Annual monitoring of the subpopulation along the main stem of the Chattooga River will also be executed to ensure that no impacts are occurring from implementation of this recreational project. Specific monitoring requirements for the Rock Gnome Lichen will include:

1. A botanist familiar with rock gnome lichen identification and the exact location along the main stem of the Chattooga River would annually assess the subpopulation.
2. The evaluation would record the presence of any refuse, any visible destruction of the lichen mat, or any other indication on the level of visitation near the subpopulation on the eastern bank of the Chattooga River.
3. Monitoring would include recording data for the *Gymnoderma lineare* rapid assessment field form as a reference metric for assessing any change in population size or vigor. Data recorded would include the temporary plot sizes, an abundance cover class for each plots and an assessment on the vigor/health for each plot.
4. The USFS would provide maps of any additional located subpopulations to the Asheville Field Office of the U.S. Fish and Wildlife Service.
5. An annual monitoring report would be supplied to the Asheville Field Office as part of the more comprehensive annual threatened and endangered species monitoring report.

Additionally, there are no anticipated indirect effects to the rock gnome lichen from the proposed recreational use changes. Given the relative remoteness of the site and its physical characteristics, which discourage any stops by boaters, it is unlikely there will be increased visitation to this site if the recreation proposal is implemented. Therefore, the BA concludes that the proposed recreational changes are not likely to adversely affect the rock gnome lichen and the proposed activities associated with opening up a portion of the upper Chattooga River to limited boating will have no effect on any other federally listed species.

Based on the information provided in the BA and the USFS's commitment to monitor the rock gnome lichen subpopulation in the project corridor, we concur with the BA's assessment that the preferred alternative (Alternative 13A) is not likely to adversely affect the rock gnome lichen. Therefore, the requirements under section 7(c) of the Act are fulfilled. However, obligations under section 7 of the Act must be reconsidered if: (1) new information reveals impacts of this identified action that may affect listed species or critical habitat in a manner not previously considered, (2) this action is subsequently modified in a manner that was not considered in this review, or (3) a new species is listed or critical habitat is determined that may be affected by the identified action.

We appreciate your cooperation and coordination with our office on this project. If you have questions, please contact Mr. Allen Ratzlaff of our staff at 828/258-3939, Ext. 229. In any future correspondence concerning this project, please reference our Log Number 4-2-05-454.

cc:

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