

From: Bunny Johns <bunnyjohns@yahoo.com>
Sent: Tuesday, June 12, 2012 10:33 AM
To: FS-comments-southern-francismarion-sumter
Subject: Chattooga River Theme Park

Comments on Proposed Theme Park on the Chattooga Wild and Scenic River:

- * This is an invasion of the Wild and Scenic Corridor of the river. It is unwanted and not needed by the people who utilize the corridor for the activities for which it was designated wild and scenic.
- *The scale of the development, even if it were needed, violates the current management guidelines for the Chattooga River.
- *It appears to be more of a theme park that will provide monetary support for a specific organization. This is not in keeping with the designation of wild and scenic.
- *The loss of the 100 foot buffer has the potential to harm the river inhabitants including at least one rare mussel.
- *Our great country has many pressing needs at the present time and no money for extras. This is an extra and should not be taken into consideration by the USFS.
- *I know the USFS has been "cut to the bone" due to the current deficit. Therefore, it would be best for the USFS to best utilize its resources to protect the resource rather than to develop it.

Thank you for this opportunity to comment.

Elizabeth (Bunny) Johns
PO Box 91
Almond, NC 28702
828 736 3137

Elizabeth B. (Bunny) Johns
BunRab Enterprises
PO Box 91, Almond, NC 28702; (cell 828 736 3137)

"The only way to discover the limits of the possible is to go beyond them into the impossible." Arthur C. Clarke



From: Sarajoy Booth <thebackwoodshoa@aol.com>
Sent: Thursday, June 14, 2012 2:04 PM
To: FS-comments-southern-francismarion-sumter
Subject: ?!?

Why? Does your greed really overwhelm your passion for our environment? I cannot believe what my forest service is thinking. WHY?! Our environment needs all the help it can get, not have it's humans conquer it! Have we learned nothing from the past? How about trying to do good for our future generations, not just think selfishly. I am so upset at the lack of respect.

I hope this is all reconsidered and I hope we can "put our minds together and see what life we can make for our children."

Thank you for your time.

From: Frances Glass <glasshf@gmail.com>
Sent: Wednesday, June 13, 2012 4:24 PM
To: FS-comments-southern-francismarion-sumter
Subject: action—"Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor;"

To all concerned,

it is probably not necessary to rehash all of the reasons for not developing a "farmstead" so close to the Chattooga Wild and Scenic Corridor. Masters of the Obvious have no doubt covered them all and submitted them by the deadline..

If you must restore the property for cultural heritage reasons, why not just restore the buildings? No farm livestock, no gift shop or parking lots, no charge for admission, a tasteful display of historic photos and exhibits for the curious and truly interested to find and explore? If it can't be done without compromising the Wild and Scenic river Act, then move on! Have your little fund raiser socials in town and stop making up excuses to tweek the Act as it is written and should be enforced!

Sincerely,

Frances Glass
2623 Hawthorne Drive NE
Atlanta, Georgia 30345
cell:404 428 6697

From: hhbsharpe@truvista.net
Sent: Monday, June 11, 2012 8:43 AM
To: FS-comments-southern-francismarion-sumter
Subject: Chatooga Farm

I am one of those who favor the planned farm at the Chattooga. While I understand the environmentalist not wanting it too often we allow them to interfere with things that are historical to our state and country. I live in the midlands of SC but I enjoy being able to see the things that are history to our state and hope this project goes forward.

H. Sharpe
Lexington, SC



From: Mrdsnyder1@aol.com
Sent: Friday, June 08, 2012 12:03 PM
To: FS-comments-southern-francismarion-sumter
Subject: Chattooga River Comment

Dear Sirs:

I am an avid Fly fisherman and member of the Mountain Bridge Chapter of Trout Unlimited. Please accept my comments regarding the proposed project on the Chattooga River as those of an individual who sincerely believes in the protection of our cold water fisheries.

The Chattooga is a wild and beautiful river and has wisely been protected from the abuses associated with commercial uses. This project has the potential to severely endanger the habitat for trout and will put us on a slippery slope towards more exceptions of exiting law and regulation. I object strongly to its approval.

David M. Snyder

From: jeffrey hatcher <jhatcher_md@yahoo.com>
Sent: Friday, June 08, 2012 10:40 PM
To: FS-comments-southern-francismarion-sumter
Subject: Chattooga River "Herritage site"

Dear Sirs,

The appalachian mountains are not my first home. I was born in and spent my formative years in the river valleys of Kentucky. As finished my professional training, I spent more time in the Appalachians- hiking and later enjoying water sports. While I do applaud the idea of educating folks about the history of Appalachian heritage, I do have to question the plan's impact to the Chattooga Wild and Scenic River Corridor.

As quoted from the plan "The proposal also includes a non-significant amendment to the 2004 Revised Land and Resource Management Plan, Sumter National Forest to allow restoration of the original farm landscape that included historic gardens, agricultural fields and livestock pastures." I am very alarmed with the wording "non-significant. "

Any farms is an open system. That means exported product must be balance with imported goods. For example, produce must be balanced with fertilizer. To properly maintain this balance requires the movement of material which will impact the local environment. The application of fertilizer will result in runoff regardless if it's a commercial product or cow poo. This can and will impact the river.

Adding animals to the farm produce will increase the rate of change to the micro-environment. This will of course extend to the broader environment of the Wild and Scenic River Corridor. It's hard to balance the right size feed area for an animal and most farmers need to import food stock. Again more movement of material in and out of a delicate preserve.

I just finished reading an outstanding book about the history of a river. After a century of industrial pollution, the river has rebounded to wildlife and the people who take joy in it. The greatest threat to the river now is agricultural. Granted this plan is for a small farm but it does not address procedure and process for a working farm. Just think of the rain falling directly on a cow pasture and run off right into the river. Would you want to recreate in or drink that water? Please reconsider the damage that you will do to this fragile ecosystem.

Jeffrey C. Hatcher, MD
401 W Bessemer Ave
Greensboro, NC 27401

From: Nelson Highley <nhighley@carolina.rr.com>
Sent: Thursday, June 07, 2012 5:02 PM
To: FS-comments-southern-francismarion-sumter
Subject: Are you serious?

This is so ridiculous that there must be something very, very wrong. If the FS is serious, I hope that there will be a serious and in-depth investigation to find out who is being paid off to even propose this. I will be working hard to see that this investigation is made.

nhighley@carolina.rr.com

From: Sue Harmon <suepharmon@gmail.com>
Sent: Wednesday, June 13, 2012 12:36 PM
To: FS-comments-southern-francismarion-sumter
Subject: Comments on Propose plan for Russell House Tract

Dear Forest Service folks,

Just weighing in on this issue.

I feel strongly that the Chattooga Wild and Scenic River Corridor must be protected from development of all kinds, however thoughtful, public-education-oriented and historically significant they might be.

The proposed "Southern Appalachian Farmstead" sounds like a great idea for many reasons, but not for this location, not in one of our very few designated wilderness areas. There is plenty of other space elsewhere for this kind of development.

I urge you be vigilant in protecting this precious space and not to allow this development.

Sue Harmon
3705 Hilldale Rd
Oakwood, GA 30566
suepharmon@gmail.com
770-540-3672

From: The Murdocks <murdock1@mindspring.com>
Sent: Thursday, June 07, 2012 5:13 PM
To: FS-comments-southern-francismarion-sumter
Cc: Alan Toney; Larry Winslett
Subject: Chattooga Farmstead Project.....Attention Andrew Pickens

Dear Ranger Pickens,

The Georgia Chapter of the Sierra Club has an ongoing interest in any development work that might impact the upper Chattooga River. Therefore we want to learn more about the Farmstead project that we have heard about via other conversationalists. Please forward to me the Scoping Notice and Decision Statement that was published regarding this project.

Thanks you,
Mike Murdock, Chair
Wildlands Committee
Georgia Chapter, Sierra Club

murdock1@mindspring.com
EarthLink Revolves Around You.



From: Steven Crabb <steven@fnmfg.com>
Sent: Wednesday, June 06, 2012 10:40 AM
To: FS-comments-southern-francismarion-sumter
Subject: Chattooga River OHC

I am writing to speak out against the proposed Farm near the Chattooga River. This is a river that needs to be protected. We do not need to sacrifice water quality for this purpose. This is a dangerous precedent to be setting and I am firmly against it.

Steven Crabb

From: Mattox, James H. <MattoxJH@dot.state.sc.us>
Sent: Thursday, June 07, 2012 9:19 AM
To: FS-comments-southern-francismarion-sumter
Subject: Chattooga River Comment

To whom it may concern,

I have reviewed the EA on the Southern Appalachian Farmstead in the Chattooga Wild and Scenic River Corridor. It is my opinion that reducing buffers on a Wild and Scenic River is a bad idea. On the flip side, it wouldn't hurt SC to have a cultural interpretive center like the Russell Farmstead. I strongly feel that this needs to be done in an environmentally conscious (i.e. low impact) way because the impacts are far reaching and will could potentially set a precedent for other protected areas to be open for commercialism.

Respectfully,
James H. Mattox, III

2217 Quail Hollow Court
West Columbia, SC 29169

From: L. Drucker <lmdrucker@earthlink.net>
Sent: Monday, June 11, 2012 10:26 AM
To: FS-comments-southern-francismarion-sumter
Subject: Chattooga River Farmstead Site - Chattooga Wild & Scenic River Corridor

To Whom It May Concern - US Forest Service:

I am writing with a comment about the proposed Chattooga River Farmstead Site. I have a unique perspective, since I am both a cultural resources professional in the historic preservation field, and a Chattooga River paddler and environmentalist. I therefore stand with a foot in each camp of this controversy.

I can certainly appreciate the Oconee Heritage Center's goal in wanting to preserve and present a mountain farmstead and its culture history to the interested public. The Mountain / Pioneer Farmstead at Cherokee, NC serves much the same purpose and is quite interesting and educational.

However, I am extremely concerned about the proximity, sediment increase, general disturbance, and violation of its pristine and clean environment that will occur if stream buffers along the Chattooga are reduced from 100 ft, gravel parking lots & visitor facilities are built on the proposed site, chemical toilets are installed, and visitors are allowed to use and abuse trails down to the river -- which they will regardless of signage.

The county history project is a commendable one, but the threats it presents to the Chattooga River's wild & scenic values are all too real. What is commonly done to "mitigate adverse effect" to an existing significant natural or cultural resource like this is to avoid damage by RELOCATING the project to a less damaging place.

This Living History project is in the wrong geographic place. ANY development within the Wild & Scenic River Corridor will damage the river and set a dangerous precedent. There are plenty of other places to build a Living History Farmstead in Oconee County. If the folks at the Heritage Center truly love the cultural and natural history of this beautiful area, they need to find a location for this tourist attraction well away from the Chattooga W&SR Corridor.

Thank you for allowing me this input.

L. M. Drucker, Director

L. M. Drucker, Ph.D., RPA

Consulting Archaeologist

AF CONSULTANTS

6546 Haley Drive

Columbia SC 29206

An ACRA member since 1995

A Certified Woman-Owned Small Business since 1977

E-mail: lmdrucker@earthlink.net OR
afconsultants2@earthlink.net

eFAX: 510-380-7771
Phone: 803-787-4169
Toll-Free: 1-866-240-9619
Web: <http://home.earthlink.net/~lmdrucker/afconsultants/>

This email and any files transmitted with it may contain PRIVILEGED or CONFIDENTIAL information and may be read or used only by the intended recipient. Recipient bears the responsibility for checking its accuracy against corresponding signed documents provided by AF Consultants or L. M. Drucker. If you are not the intended recipient of the email or any of its attachments, please be advised that you have received this email in error and that any use, dissemination, distribution, forwarding, printing, or copying of this email or any attached files is strictly prohibited. If you have received this email in error, please immediately purge it and all attachments and notify the sender by reply email or contact the sender at the number listed above.

From: Judy Hammond <judyhammond51@gmail.com>
Sent: Wednesday, June 13, 2012 9:44 AM
To: FS-comments-southern-francismarion-sumter
Subject: Citizen concerns about the Chattooga Wild and Scenic River Farmstead proposal

Comment to : District Ranger
Andrew Pickens Ranger District
112 Andrews Pickens Circle
Mountain Rest, SC 29664

My name is Judy Hammond and I am writing about my concerns on the proposal: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor. The Chattooga River is a very special place to me individually – and this is a common feeling for anyone who has spent time in/on/along/hiking that spectacular area. It was made a wild and scenic river to protect it from development. I find it imminently important to preserve this area and especially the small corridor it has been allotted from any development. There is so much land available for interpretive development that does not impact the river, flood plane – you need to look into those possibilities. As I know that interpretation is an important aspect of your jobs, I am disappointed in your lack of protecting the corridor of one of the few remaining Wild and Scenic rivers. I would rather leave the natural beauty of the river to speak for itself – than you develop it's corridor to try to tell people how special it is – or how people lived along it in the “old days”.

Thanking you in advance for considering my opinion,
Judy Hammond

830 Dills Rd
Bryson City, NC 28713

[REDACTED]

From: James patterson <jawaka23@earthlink.net>
Sent: Thursday, June 14, 2012 9:48 AM
To: FS-comments-southern-francismarion-sumter
Subject: Comment on proposed action for the Chattooga

From: Carlton Patterson 23 Fairfield Dr Avondale Estates GA 30002

Concerning: "Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor"

Dear District Ranger, Andrew Pickens,

I am writing to oppose the theme park development at the Russell House Tract. The scale of development is in violation of the management guidelines. Those guidelines must not be changed by a forest plan amendment. The proposed farmstead goes against the Wild & Scenic Rivers Act which calls for non-degradation and enhancement of the resource. The public use of the area is driven by the natural beauty, not by a theme park. It could destroy the experience people go there for. Any lessening of the 100 foot stream buffer should not be permitted. Increased sediment from such a project will negatively affect the life in the river, degrading the resource, including the Brook Floater. The claim that the Russell House site should be placed on the National Register of Historic Places is not supported by the facts, so there is no need based on that to restore and manage the area.

Sincerely,

Carlton Patterson

From: Jerry McCollum <jerrymc@gwf.org>
Sent: Friday, June 15, 2012 9:59 AM
To: FS-comments-southern-francismarion-sumter
Subject: "Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor"



Georgia Wildlife Federation
11600 Hazelbrand Rd, Covington, GA 30014
770 787-7887

June 15, 2012

District Ranger
Andrew Pickens Ranger District
Sumter National Forest
112 Andrew Pickens Circle
Mountain Rest, SC 29664.

RE: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor

Thank you for the opportunity to comment on the Forest Service proposal to establish a southern Appalachian farmstead in Oconee County. We have read the proposal and are familiar with the area. These comments are being submitted by the Georgia Wildlife Federation (GWF) on behalf of more than 44,000 members throughout Georgia. Many of our members enjoy hunting, fishing, hiking, paddling and other outdoor activities in the Chattooga Wild and Scenic River Corridor.

Georgia Wildlife Federation is adamantly opposed to creating a tourist venue in the floodplain of the Chattooga River. We advocate for protection of critical fish and wildlife habitat and protection of water. Any land disturbance activity within the Chattooga WSR corridor has the potential to negatively affect the quality of the water and therefore upset the ecological balance of this very delicate river ecosystem. The "farmstead" proposal would have significant, negative effects on water quality, wildlife, local hunters and fishermen who use the area, and on those who seek opportunities for solitude, nature study, recreation, and all of the other attributes and activities that are linked to the Chattooga's Wild and Scenic protections.

The Forest Service proposal to change the Sumter National Forest Plan with a specific amendment to allow development inside the Wild and Scenic River Corridor sets a bad precedent. It would allow a new management direction for the National Wild and Scenic Chattooga River which increases economic opportunities in the area but does not adequately protect the river. Sumter Forest Plan standards of 100-foot stream buffer protections must be maintained in the Chattooga Wild & Scenic River Corridor, and reductions in these protections through a Forest Plan amendment must not be permitted.

It is inappropriate to create a working farm/interpretive center in the Chattooga WSR Corridor. Most of the original historic buildings on this site burned down in the 1980's. Rather than build new structures or bring in historic structures, livestock, tourists, herbicides and pavement, this area should be allowed to revert to its natural ecological state. Native trees should be planted and minimal disturbance enforced. Appalachian Farmstead exhibits are wonderful educational tools, but there are many examples of such sites as can be seen in the Great Smoky National Park. They don't belong in

the floodplain of a protected National wild and scenic river. Such a development is wholly inappropriate and the idea should be abandoned.

The Georgia Wildlife Federation strongly encourages the Forest Service, USDA to reject the proposal.

A handwritten signature in black ink, reading "Jerry L. McCollum". The signature is written in a cursive, flowing style.

Jerry L. McCollum
President & CEO

From: william baker <william127@att.net>
Sent: Thursday, May 24, 2012 6:50 PM
To: FS-comments-southern-francismarion-sumter
Subject: COMMENTS ON RUSSELL FARMSTEAD

My name is William M Baker the grandson of Mattie and Otto Russell who were the owners of the Russell Farmstead before selling it to the Federal government. My brother Russell C Baker was the person who spent his time and money getting the Russell Farmstead put on the National Historic Register. My brother Russell died in 2005, but I know he would be happy with what is proposed to be done to bring back what the farm once looked like and so am I. My grandmother Mattie Russell died a few years ago at the age of 102 and I know she would be happy with what is proposed to be done with the old farm. I would once more like to say I am happy to hear of what is to be done to the Russell Farmstead remembering all the summers my brother Russell Baker and I spent there. I hope the preposal becomes reality.

Thanks, William M Baker

email address is william127@att.net

mailing address is William Baker
101 S Walnut St
Summerville SC
29483

From: James Hopkins <jimhopone@att.net>
Sent: Sunday, June 10, 2012 1:50 PM
To: FS-comments-southern-francismarion-sumter
Cc: Brian Peterson; Malcolm Leaphart; tomcatmc@bellsouth.net
Subject: Comments on the Environmental Assessment - SAF on the Chattooga WSR Corridor

Gentlemen/Ladies:

The Mountain Bridge Chapter #046 of Trout Unlimited believes that the Environmental Assessment for the subject project is inadequate to protect the trout fishery of the Chattooga Wild and Scenic River Corridor for the following reason:

The proposed 40 ft riparian corridor minimum buffer width for this project on the Chattooga WSR is inadequate. Research has shown that a minimum of 100 ft of vegetated riparian buffer is needed to eliminate impacts on trout populations. Reducing the standard 100 foot buffer by sixty percent (60%) as stated on pages 17 and 20 of the EA will not protect the trout fishery and watershed of the Chattooga Wild and Scenic River both during the construction phase and in continued operational use, especially during periods of heavy rainfall. Significant negative impacts will occur during construction and restoration due to the use of heavy logging techniques, including building logging roads, log deck areas, timber cutting, and land clearing. Also, the relocation and reconstruction of two buildings; construction of the replica farmhouse, smokehouse, sawmill and sorghum mill and furnace, and caretaker's house; grading and surfacing of a parking lot and access roads; and adding of pit toilets will create significant opportunity for negative impacts. In addition, the ongoing operation of the facility presents significant negative impact issues due to the use of herbicides for at least 5 years and maintaining a full array of livestock and farm animals and their wastes on site in addition to a working farm and garden. All are activities that have a high potential of negative impact to the trout watershed and fishery of the river. These known impact items and, perhaps, other unforeseen impacts require that a 100 foot riparian corridor minimum buffer be maintained.

The Mountain Bridge Chapter of Trout Unlimited asks that the USFS revisit the EA for this project with particular attention to buffer requirements for trout streams.

J. A. (Jim) Hopkins

President

Mountain Bridge Chapter #046

Trout Unlimited

Greenville, SC

From: Paul Burris <burrispb@bellsouth.net>
Sent: Thursday, June 07, 2012 12:05 PM
To: FS-comments-southern-francismarion-sumter
Subject: comments, S. Appa. Farmstead

The following is my response to scoping for the project titled: "Establishing a Southern Appalachian Farmstead in the ChattoogaWild and Scenic River Corridor".

I am in full support of the U. S. Forest Service restoring the old Russell Homestead. And I support the Forest Service allowing the Heritage Center to manage that property according to mutual benefits to the public, Forest Service and the Heritage Center. I can foresee several valuable benefits from such a project should it become reality.

The Farmstead would provide an educational asset to local schools and pupils. Americans have lost the knowledge and forgotten the importance of our historical past. The vast majority of Americans owe their ancestry to rural agricultural. As little as 2 generations ago, most citizens made their living from agriculture and the Farmstead would stand to remind everyone who visits how our grandparents once lived and worked. I see the impact on the wild and scenic river as miniscule to nearly non-existent. The Russell Farmstead is nearly a quarter mile or farther from the banks of the Chattooga River and is not even in sight of anyone traveling downstream in watercraft. Opponents of this project object to absolutely everything dealing with management of public lands unless it involves even greater separation of people from nature. Opponents seek to remove as many people and local citizen from the National Forest as they can believing people should not interfere with the workings of nature. That mindset is not conservation and inconsistent with any organization calling itself a conservancy. The Forest Service needs to go forward with plans to restore the Russell place for the public's benefit and education. I reject notions of a so called conservancy calling for preservation in every thing they do, including this project to restore the Russell Farmstead. Please allow the general public to visit and learn about farm life of the mid to late 1800's.

I am a registered member of the Western Band of the Cherokee with a BIA certificate. In the vicinity of the Russell Farmstead is the location of old Cherokee village called ChattoogaTown. The farmstead could stand as reminder and contain historical information and displays educating the general public about the first people to inhabit the bottomlands containing the Russell Farm.

My grandmother was an original enrollee of the late 1800's with the Western Cherokee and according to our heritage, that branch of our family lived on similar landscape to the Russell Farmstead while making their living farming. They would have planted and raised food crops from seeds with primitive genetic traits that are rare to extinct today. The restored Russell Farmstead could have heirloom crops as part of the farmstead's historical display. Heirloom seed for corn, squash, and beans are being preserved at a few sources that specialize in such preservation of rare heirloom seeds. The farmstead could help reverse the loss rare heirloom crops.

Paul Burris, 110 Cardinal Dr., Seneca SC 29672

From: Chattooga Conservancy <info@chattoogariver.org>
Sent: Friday, June 15, 2012 5:48 PM
To: FS-comments-southern-francismarion-sumter
Subject: comments
Attachments: Chattooga Conservancy comments on SAF EA.pdf

Chattooga Conservancy
8 Sequoia Hills Lane
Clayton, GA 30525
706-782-6097
info@chattoogariver.org
<http://www.chattoogariver.org>



Chattooga Conservancy
8 Sequoia Hills Lane
Clayton, Georgia 30525
706.782.6097
info@chattoogariver.org

June 15, 2012

Mike Crane, District Ranger
Andrew Pickens Ranger District Office
Sumter National Forest
112 Andrew Pickens Circle
Mountain Rest, SC 29664

RE: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic Corridor

Dear District Ranger Crane:

On behalf of the members of the Chattooga Conservancy and the Chattooga National Wild and Scenic River (WSR), we submit the following comments on your proposal for “Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic Corridor”. The Chattooga Conservancy has reviewed the Forest Service’s Environmental Assessment of the project, the Sumter National Forest Revised Land and Resource Management Plan (RLRMP), and laws pertinent to this project and the continued protection or lack thereof for the WSR Chattooga River.

Any project within the Chattooga Wild and Scenic River Corridor warrants careful scrutiny to ensure that Forest Service activities are appropriate, and that the river’s special values are protected, and that the non-degradation requirements of the Wild & Scenic Rivers Act are upheld. Thus, the Chattooga Conservancy adamantly opposes Alternatives 2 and 3 and disputes the Service’s finding that no significant impacts will be caused to the Outstandingly Remarkable Values (ORVs) of the river by this project.

1. Project Purpose and Alternatives

a. Eligibility for the National Register

One supposed “need” supporting the project is to avoid “adverse effects” to the Russell House farmstead. This need is premised on the property’s eligibility and status on the National Register of Historic Places (NRHP). In this regard, please reference the Francis Marion & Sumter National Forest Cultural Resource Management Report 91-18, entitled *Reevaluation of the Russell Farmstead*, dated 6 September 1991, which was produced after the Russell House was destroyed on May 14, 1998. This report states:

Nine outbuildings associated with the Russell agricultural complex are still standing in various states of integrity. The aim of investigations was to determine whether this complex continues to be eligible to the NRHP, archeologically and/or architecturally, given the destruction of the main house.

The report concludes:

Better preserved examples of nineteenth to twentieth century farmsteads exist in the region and the archeological deposits lack integrity. For these reasons, this site is considered ineligible to the NRHP on both archeological and architectural grounds.

Therefore, if the property is not eligible, then there can be no adverse effects. See 36 C.F.R. § 800.5 (defining adverse effects as alteration of the characteristics that qualify the property for the National Register). The Forest Service's eligibility finding is arbitrary (because it is not supported by the record) and capricious (because it reverses the previous agency position without any reason). See EA at 119-20. Consequently, the "need" to prevent adverse effects is not a legitimate need at all, and cannot serve as justification for any related proposed actions.

b. Re-consultation with the State Historic Preservation Office (SHPO)

In a stroke of unfounded inconsistency, in the EA the Forest Service has reversed its position regarding the continued eligibility of the Russell House site for listing on the National Register of Historic Places. As acknowledged in the EA, the Forest Service and the State Historic Preservation Office (SHPO) formerly concurred that the site was no longer eligible after the Russell House burned in 1988. The Forest Service's reversal is arbitrary because it is not supported by the record, and is capricious because it is not based on any reason. Procedural steps have not been taken to address the inconsistency between SPHO's position and the Service's "new" position, which must be resolved by additional consultation with SPHO regarding eligibility and potential adverse effects.

c. Range of Alternatives

Notably, interagency guidelines promulgated by the Forest Service and the National Park Service provide that "...public use facilities such as ... visitor centers ... will, where feasible, be located outside the river area." 47 Fed. Reg. at 39459. Therefore, the Forest Service should have explicitly considered in the EA whether locations outside the WSR corridor were "feasible" for the proposed visitor center and its tourist-type activities. As a previous 1988 draft EA concerning the Russell House property acknowledged, "similar property can likely be found on private lands."

In addition, NEPA prohibits a federal agency from so narrowly construing a project as to preclude the consideration of other alternatives. See Simmons v. U.S. Army Corps of Eng'rs, 120 F3d 664 (7th Cir. 1997). The court there concluded:

One obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing "reasonable alternatives" out of consideration (and even out of existence) ... If NEPA mandates anything, it mandates this: a federal agency cannot ram through a project before first weighing the pros and cons of the alternatives.

By hinging this project on the "restoration" of the Russell House farmstead that is exactly with the Forest Service has done. As acknowledged time and again, the Forest Service knows that other sites exist that can serve the same overall purpose of this project – without compromising or potentially degrading the multiple Outstandingly Remarkable Values provided and protected by the Chattooga National Wild and Scenic River. And without running afoul of the mandates of NEPA.

2. Forest Plan Standards

a. Riparian Corridor Width

Sedimentation is undisputedly acknowledged as one of the greatest threats to the Chattooga River's water quality (reference the Van Lear report, numerous Total Maximum Daily Load plans for streams in the Chattooga watershed, etc.). In the EA, the Forest Service proposes to amend the Sumter National Forest Revised Land and Resource Management Plan (RLRMP) to change the riparian prescription boundary, shrinking the protected riparian corridor in the proposed project area from 100 feet to 40 feet, or by about 2.8 acres. EA at 71, 73.

Forest Wide provision 101 of the RLRMP prohibits the project-level refinement of prescription boundaries when those refinements could potentially negatively affect the outstandingly remarkable values (ORVs) of Wild and Scenic streams. Through this project, the Forest Service proposes a reduction of the riparian prescription boundary from 100 feet to 40 feet, thus eliminating 2.8 acres of riparian buffer within the Chattooga WSR corridor and project area. This is unacceptable in itself, and the potential negative impacts are multiplied further by the fact that 67% of the proposed project area lies within the riparian corridor. This potentially negatively impacts the Chattooga's ORV's of water quality, aquatic resources, biological habitat, and fishing, and cannot be done without conducting a separate environmental assessment pursuant to the National Environmental Policy Act.

b. Recreation Opportunity Spectrum

The proposed project violates the Forest Plan's direction for recreation development within areas of the WSR corridor designated as "recreational" sections. As the Forest Service states in the EA, the desired condition for the management area prescription in which the entire Russell House site and surrounding area is located is a recreation opportunity spectrum (ROS) of "roaded natural", which is represented by the site's existing development scale of 2. EA at 54; RLRMP at 3-17. The proposed activity is not consistent with this level of development. In addition, the Forest Service's unfounded consideration that 5 acres at the proposed project site are in the ROS class of "rural" is in

error, and completely unsubstantiated by the setting indicators and descriptions for that class.

3. Standards relating to the protection of ORVs & NEPA

a. Sounds

The Wild & Scenic Rivers Act is a backstop on the Forest Service's obligation to assess a proposed project, and the ability to approve a project. The Forest Service acknowledges that the Act requires a "non-degradation" policy for the WSR's ORVs. EA at 10; 47 Fed. Reg. 39454, 39458-59. The Forest Service's proposed actions include motorized access, bluegrass concerts, operation of a sawmill, and other activities inside of or adjacent to the WSR corridor, all of which would generate loud noises. The EA fails to consider noise impacts, which will in all likelihood degrade one of the River's most significant values.

b. Agricultural Practices

Interagency guidelines also provide specific requirements that are implicated by the project. For example, the guidelines provide that agricultural practices on federal lands "should be similar in nature and intensity to those present in the area at the time of designation." 47 Fed. Reg. at 39459. At the time of the Chattooga's WSR Act designation, there were no active, ongoing agricultural activities at the Russell House site.

4. Consideration of Impacts under NEPA

NEPA requires consideration of cumulative effects, and direct and indirect impacts, and the WSR Act requires non-degradation of ORVs. The entire area around the Hwy. 28 Bridge, including the 20 acres targeted for the proposed "farmstead" project, is representative of key ORVs of the Chattooga WSR Corridor, which are prioritized and so highly regarded by the public for preservation and proper stewardship in our wild and scenic rivers system. The EA is flawed by its bias towards a single "history-based" user group, stated in the EA as representing less than 1% of public interests in the area, over those seeking the priority, key ORVs in the WSR Corridor.

In addition, the EA's lack of specific information about many aspects of the proposed project, and its vague, deficient, and erroneous recitations, clearly undermines and/or negates the credibility of the Forest Service fulfilling their requirements of considering impacts under NEPA. We note these two instances among the EA's numerous misleading or erroneous statements: i) asserting that the proposed project could be removed from the landscape, when the project includes construction of "a [new] traditional local housing type ...in character with the historic setting" for a caretaker's residence, which would by all descriptions be a permanent structure located inside of the WSR Corridor; and, ii) the illogical conclusion that building a new, 30-car parking lot within the WSR Corridor "would not add additional capacity in the corridor." Therefore, non-degradation of the Chattooga WSR Corridor's ORVs cannot be assured, as further illustrated by the examples cited below.

a. Sounds:

While the EA describes the project as including educational programs and events, EA at 6, the EA does not disclose or analyze the effects of using the property as a venue for events. This is a significant omission, especially with respect to noise impacts, not to mention waste disposal, pressures on septic system carrying capacity, and water use. Solitude is an important component of the Recreation ORV, and although the EA analyzes impacts on backcountry capacities, it entirely fails to mention noise impacts. More generally, the EA fails to say whether the “related events” would require their own special use permits or would be part of this permit. If they would be part of this permit, the Forest Service must describe what events will be allowed and their effects. The EA also fails to analyze or disclose the effects of noise impacts to the Big Mountain Roadless Area, whose southern boundary is very close to the proposed project area.

b. Recreation

The EA identifies anglers and hunters who are interested in more remote settings and solitude as likely to get displaced by the proposed project. The WSR Corridor’s management directives are designed to serve this user group, and the project would result in degradation of the ORVs that they seek. Based on unsubstantiated user “estimates” and an incidental, off-season survey during the spring and fall, the EA also completely disregards consideration of other popular recreational activities such as swimming, hiking, relaxing and picnicking, and thus fails completely to analyze the proposed project’s effects on this category of ORVs. Lastly, there is a vague but pointed reference to “the potential for additional outfitter/guiding permits being proposed that may impact use in the Chattooga WSR,” and although a 3-year-old, controversial scoping notice for this is in the pipeline, the EA obfuscated this issue relative to the potential cumulative impacts to ORVs and instead mentions it only in relation to parking lot impacts.

c. Aquatic Resources

The EA states that implementation of the proposed project is expected to result in a doubling of sediment loads into the Chattooga River in the vicinity of the project area. As stated above, sediment is a great threat to the Chattooga’s water quality, with potentially significant negative impacts to and degradation of the Chattooga’s ORV’s of water quality, aquatic resources, biological habitat, aquatic species’ viability, and fishing. Therefore, and especially within the WSR Corridor, the Forest Service must uphold the highest standards for riparian zone protections, to demonstrate a commitment to non-degradation as per the WSR Act.

Of particular concern in the vicinity of the proposed project area is *Alasmodonta varicosa*, or Brook Floater, which is rated as the highest conservation priority, and whose population in the Chattooga River is of global significance. Indeed, the Brook Floater was recently included in a petition to the USFWS to be formally listed as an endangered species, and the Service acknowledged the veracity of this by way of issuing a positive 90-day finding and status review. The EA acknowledges that *Alasmodonta varicosa* is

only known from the vicinity of the Highway 28 Bridge and downstream in the main channel of the Chattooga, and the presence of the Brook Floater there makes this zone the Brook Floater's ecologically critical area. This very same area overlays with the proposed project and its negative impacts on water quality and riparian habitat that stabilizes stream banks and reduces sedimentation, regulates water temperatures and protects oxygen levels for aquatic species. The EA also acknowledges that the Brook Floater's viability is potentially at risk from too much sediment, flow alteration, and low oxygen conditions. Lastly, the EA states that habitat surveys have not been conducted in project area streams or in the Chattooga River below Highway 28, which indicates that important baseline data does not exist. In conclusion, the Forest Service makes the totally unfounded statement that there would be no impacts to *Alasmadonta varicosa*, due to the abundance of habitat; whereas displacement is and of itself is an impact. Clearly, this statement is wholly illogical and cannot satisfy NEPA's requirements of the consideration of cumulative effects, and direct and indirect impacts, and the WSR Act's requirement of non-degradation of ORVs.

5. Archeological Resources - Eligibility and Consultation Requirement

The Forest Plan acknowledges that the archeological resources at the site are potentially eligible for inclusion on the National Register of Historic Places. NEPA requires that before proceeding with an agency undertaking such as this project, the Forest Service must consult with SHPO and interested tribes about this potential eligibility. Moreover, if it is determined that these archeological resources are eligible for registration, then the Forest Service must consult with SHPO and interested tribes about the potential adverse impacts to these archeological resources that Alternative 2 presents. Although, the Service mentions the Eastern Band of the Cherokee Indians as a consultant, this reference might be to the Service's consultation with the tribe in 2009. Given the Service's assertion that "previous archaeological work has identified portions of the Chattooga Town site in areas planned for cultivation..." the EA should provide affirmative evidence of the tribe's opinion as to the proposed alternative.

6. Amendment # 2 to the RLRMP

The Forest Service should not use the EA to justify decisions that were made prior to the analysis. For example, decisions to amend the management plan or plans to do so should not be made prior to the assessment's completion. This EA does just that by offering to change the management plan so the proposed action could occur. The proposed amendment to the management plan will reduce riparian buffers and relax other environmental regulations, which could have a significant effect on future projects and their environmental impact.

In conclusion, it is incredulous that the Forest Service seeks to make "living history" out of agricultural practices that the scientific community, the Service, and the public acknowledge cause degradation of the nation's natural resources. Farming the floodplains of our mountain rivers and streams is one of the leading causes of degradation to tributaries of the Chattooga WSR. A casual drive through the watershed after a rain

will confirm this. A review of the “impaired waters” of multiple streams with the Chattooga River watershed puts on the affirmative stamp of the legal and scientific community.

Likewise, when Congress held hearings in the early 1970s to consider including the Chattooga River in the National Wild & Scenic River System, the chairman of the House Committee of Interior and Insular Affairs asked a prominent witness, “What is the greatest threat to the Chattooga River?” The answer was *over commercialization*. Now, the US Forest Service, the entity charged with managing and protecting the Wild and Scenic Corridor is the progenitor of the very type of activity that flies directly in the face of why the Chattooga is a national wild and scenic river. Has the Andrew Pickens Ranger District not harkened to the woes of Yosemite and Yellowstone where streams of tourists and concessionaires have ruined what was meant to be preserved? Respect and protect what has been put in your charge.

For the foregoing reasons and for the hope of actually improving the ecological health of the Chattooga River, the Chattooga Conservancy requests that you abandon this ill-conceived project.

For the Chattooga,

/s/

Buzz Williams, Executive Director
Nicole Hayler, Program Director
Andy Smith, Research Assistant

From: Stanley & Tony Casadonte <benshouse@mindspring.com>
Sent: Friday, June 15, 2012 11:09 PM
To: FS-comments-southern-francismarion-sumter
Subject: Do Not Allow this rule change - Protect the Wild & Scenic Corridor

Dear Forest Service Official,

I would like to add my voice in opposition to the Russell House Development.
DO NOT change your rules. You must maintain and preserve the Wild and Scenic corridor.

Please add my contact information to and public distribution of information concerning this subject.
Regards,

Tony Casadonte
399 Golfview Rd. NW
Atlanta, GA 30309
404-234-4364

From: info@whetstonephoto.com
Sent: Friday, June 15, 2012 3:12 PM
To: FS-comments-southern-francismarion-sumter
Subject: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor

Dear Sirs or Madams;

I would like to express my **disapproval** of the proposed Farmstead to be located along the Wild and Scenic Chattooga.

This development is in violation of the management guidelines for the Chattooga River. I would not like to see a farmstead that would be operated as a "theme park" within the recreational boundaries of the Wild and Scenic Chattooga. This proposal is unwarranted and cannot be funded during this time of economic downturn. How the funding will occur is an issue to be addressed. Many tax-payers would not approve of any additional burden for a project like this.

The stream buffer protections would be jeopardized, the resources that are in existence will be compromised. The amendment to change the Sumter National Forest Plan to allow development within the Wild and Scenic River Corridor is absolutely uncalled for, and illegal.

The Historic Russell House site is not recognized as a National Register of Historic Places. The following points are to be taken into consideration:

The proposed scale of development for the "farmstead" is **in violation of the management guidelines** for designated recreational river sections on the Chattooga River. These management guidelines **must not** be changed through a forest plan amendment.

The Wild & Scenic Rivers Act (WSRA) calls for non-degradation and enhancement of the resource, and public expectations are aligned with this standard. The proposed "farmstead" is a theme park whose negative impacts directly conflict with river protection standards and guidelines, as well as public expectations for upholding WSRA mandates. Thus, the "farmstead" should not be permitted.

The proposed "farmstead" would cause **unacceptable, localized degradation of the Chattooga's outstanding resource values** of wildlife, botany, fisheries, recreation, scenery, and "experience" (i.e., sights, sounds and solitude). Therefore, the "farmstead" proposal should not be permitted.

Sumter Forest Plan standards of **100-foot stream buffer protections must be maintained** in the Chattooga Wild & Scenic River Corridor, and reductions in these protections through a Forest Plan amendment must not be permitted.

The proposed reduction of stream buffers would cause increased sediment loads and degradation of water quality, and negative impacts to fisheries and aquatic resources. Of special concern is the mussel species called the **Brook Floater**, *Alasmidonta varicosa*, whose population within the Chattooga River is of **global significance**. Brook Floater populations are only known from the vicinity of the Highway 28 Bridge and downstream—an area that overlaps with the proposed "farmstead" project area and its projected negative impacts. Sediment is the primary risk factor for damaging viable populations of the Brook Floater; therefore, the "farmstead" project and its projected increased sediment loads and localized degradation of water quality in the Chattooga River must not be permitted.

Cordially,

Tina Stults
PO Box 90
Long Creek SC 29658

From: Clay Nash <nashpaint@windstream.net>
Sent: Wednesday, June 13, 2012 3:56 PM
To: FS-comments-southern-francismarion-sumter
Subject: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor

I would like to comment on the proposed farmstead at the Russell House. I cannot think of a worse use of taxpayer dollars than to build a facility there. With all the money that has been spent to acquire property in the corridor in order to prevent development and then turn around and build a commercial enterprise is not only a waste of funds but contrary to the ideals of "Wild and Scenic".

Looking at the fundamentals of this project, it is doomed to failure. It is so far from any population center and located miles down the curviest roads from any direction. This is not like a working farm in the Smokies where you have a destination park and the farm ads to it. In this case the farm would be the destination and the location is lousy from an environmental stand point, a business standpoint, and a taxpayer standpoint.

There are plenty of other sites that would be a better waste of taxpayer dollars. Russell House needs to be kept as it is, on in this case, as it isn't.

Clay Nash
2045 Persimmon Road
Clayton, GA 30525

706-782-7411

From: patrick hinchey <patrickhinchey6@hotmail.com>
Sent: Wednesday, June 06, 2012 2:06 PM
To: FS-comments-southern-francismarion-sumter
Subject: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor

Sir/Madame:

Please accept this as my comment on proposed activity within the Sumter National Forest, at the Russell Homestead along the banks of the Chattooga River near Highway 28.

My name is Patrick Hinchey and My address is 805 Maple Street, New Smyrna Beach, Florida 32169.

Title of your proposed action—"Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor.

Here are my comments specific comments on the proposed action along with your supporting reasons:

My comments are simple: either do not do this, or find a more suitable location. Reasoning is provided below.

The proposed scale of development for the "farmstead" is in violation of the management guidelines for designated recreational river sections on the Chattooga River. These management guidelines must not be changed through a forest plan amendment.

The Wild & Scenic Rivers Act (WSRA) calls for non-degradation and enhancement of the resource, and public expectations are aligned with this standard. The proposed "farmstead" is a theme park whose negative impacts directly conflict with river protection standards and guidelines, as well as public expectations for upholding WSRA mandates. Thus, the "farmstead" should not be permitted.

The proposed "farmstead" would cause unacceptable, localized degradation of the Chattooga's outstanding resource values of wildlife, botany, fisheries, recreation, scenery, and "experience" (i.e., sights, sounds and solitude). Therefore, the "farmstead" proposal should not be permitted. Sumter Forest Plan standards of 100-foot stream buffer protections must be maintained in the Chattooga Wild & Scenic River Corridor, and reductions in these protections through a Forest Plan amendment must not be permitted.

The Forest Service's claim that the Russell House site merits recognition on the National Register of Historic Places (NRHP) is completely unsupported by any facts. Therefore, the Forest Service's purported "need" to restore and manage the old Russell farmstead to uphold NRHP standards is invalid, and is based on a false premise. Therefore, the "farmstead" proposal should not be permitted inside of the Wild & Scenic River Corridor.

The proposed reduction of stream buffers would cause increased sediment loads and degradation of water quality, and negative impacts to fisheries and aquatic resources. Of special concern is the mussel species called the Brook Floater, *Alasmidonta varicosa*, whose population within the Chattooga River is of global significance. Brook Floater populations are only known from the vicinity of the Highway 28 Bridge and downstream—an area that overlaps with the proposed "farmstead" project area and its projected negative impacts. Sediment is the primary risk factor for damaging viable populations of the Brook Floater; therefore, the "farmstead" project and its projected increased sediment loads and localized degradation of water quality in the Chattooga River must not be permitted.

Please find an alternate and more appropriate location for this project.

Sincerely

/s/ Patrick D. Hinchey

From: Pamela Gould <kayakgoddess@earthlink.net>
Sent: Friday, June 15, 2012 6:07 PM
To: FS-comments-southern-francismarion-sumter
Subject: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor;"

THE CHATTOOGA RIVER IS ONE OF THE NATURAL TREASURES OF GEORGIA. PLEASE, PLEASE PLEASE DO ALL YOU CAN TO PROTECT IT'S NATURAL BEAUTY. THIS is what brings people to this area! This is what makes it so very special. Here are just SOME of the reasons I strongly oppose this with every fiber of my being.

Details of the development scheme include:

- Reducing stream buffer protections from 100 feet down to 40 feet
- Construction of a new, gated 30-car parking lot, placed within 200 feet of the Chattooga River
- Installing livestock pastures, and building corrals
- Installation of 2 or more buildings
- Construction of a gift shop
- Clearing away trees
- Heavy use of herbicides

The proposal calls for leasing the tract to the Oconee Heritage Center (OHC), who would manage and guard the development, which would be called the "Southern Appalachian Farmstead." The OHC would be allowed to charge fees for public access to the area, and permitted to use the riverside property for a wide array of fundraising and other activities, and to bring in "partners" for advancing the development scheme.

The "farmstead" proposal would have significant, negative effects on water quality, wildlife, local hunters and fishermen who use the area, and on those who seek opportunities for solitude, nature study, recreation, and all of the other attributes and activities that are linked to the Chattooga's Wild and Scenic protections. Yet, the Forest Service says that these issues are not significant.

But wait— isn't the Wild and Scenic Chattooga River supposed to be protected from development? Well, the Forest Service is also **proposing to change the Sumter National Forest Plan** with a specific **amendment to allow this development inside the Wild and Scenic River Corridor**, which would also allow a new management direction for the National Wild and Scenic Chattooga River.

PLEASE PROVIDE YOUR COMMENTS TO THE FOREST SERVICE ON THIS IMPORTANT DECISION. COMMENTS ARE DUE BY JUNE 15TH.

In addition to the facts presented above, here are some points that could be included in your comments:

☒ The proposed scale of development for the "farmstead" is **in violation of the management guidelines** for designated recreational river sections on the Chattooga River. These management guidelines **must not** be changed through a forest plan amendment.

(continued on next page)

-
-
-
-
-
- 📄 **The Wild & Scenic Rivers Act (WSRA) calls for non-degradation and enhancement of the resource**, and public expectations are aligned with this standard. The proposed “farmstead” is a theme park whose negative impacts directly conflict with river protection standards and guidelines, as well as public expectations for upholding WSRA mandates. Thus, the “farmstead” should not be permitted.
 - 📄 The proposed “farmstead” would cause **unacceptable, localized degradation of the Chattooga’s outstanding resource values** of wildlife, botany, fisheries, recreation, scenery, and “experience” (i.e., sights, sounds and solitude). Therefore, the “farmstead” proposal should not be permitted.
 - 📄 Sumter Forest Plan standards of **100-foot stream buffer protections must be maintained** in the Chattooga Wild & Scenic River Corridor, and reductions in these protections through a Forest Plan amendment must not be permitted.
 - 📄 The Forest Service’s claim that the Russell House site merits recognition on the National Register of Historic Places (NRHP) is **completely unsupported by any facts**. Therefore, the Forest Service’s purported “**need**” to restore and manage the old Russell farmstead to uphold NRHP standards **is invalid**, and is based on a false premise. Therefore, the “farmstead” proposal should not be permitted inside of the Wild & Scenic River Corridor.
 - 📄 The proposed reduction of stream buffers would cause increased sediment loads and degradation of water quality, and negative impacts to fisheries and aquatic resources. Of special concern is the mussel species called the **Brook Floater**, *Alasmidonta varicosa*, whose population within the Chattooga River is of **global significance**. Brook Floater populations are only known from the vicinity of the Highway 28 Bridge and downstream—an area that overlaps with the proposed “farmstead” project area and its projected negative impacts. Sediment is the primary risk factor for damaging viable populations of the Brook Floater; therefore, the “farmstead” project and its projected increased sediment loads and localized degradation of water quality in the Chattooga River must not be permitted.

Pamela Gould

976 Highland View

Atlanta, GA 30306

also: property owner in Rabun County currently building a house.

Pamela Gould
Herbalist & Educator

contact #: 404.886.1297

www.earthmamaherbals.com
www.theherbkitchen.com

From: Peter Peteet <petes_garage@earthlink.net>
Sent: Thursday, June 14, 2012 5:49 AM
To: FS-comments-southern-francismarion-sumter; info@chattoogariver.org
Subject: "Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor;"

Dear District Ranger,

I am writing to comment on the plans which would allow the Oconee Heritage Center to redevelop the site commonly referred to as the "Russell House". I have great respect and appreciation for the Heritage Center as it houses and preserves the dugout canoe I found in the river in '04. I have read the proposal and visited the site. I come from a family which has lived in the southeast for at least seven generations and wish to have the artifacts and documentations of the lifeways of my ancestors preserved and respected. I do not believe this proposed development is the proper path to that goal.

The reasons for my opposition are both ecological and archeological. Ecologically, this project is a terrible precedent in that it places ease of access above preservation of the resource itself. The farming and logging practices which allowed settlement and development of this area were and still are destructive and unsustainable; the damage done has slowly been healing. Preservation of the "ORV's" (an ironic acronym as it applies also to off road vehicles-which continue to be one of the largest problems in management and restoration of the area) is dependent on maintaining a policy of allowing the forests and streams to return to the balanced and stable state of mature climax forest which was present before European contact. That state is necessary because it is the only way to maintain the niches which are essential to the survival of native creatures-the Brook Floater being a prime and local example of this. Setting the precedent of allowing this process to be reversed in order to ease drive in viewing of a recreated and artificial approximation of the actual ecology and artifacts is a slap in the face to the goals laid out for Wild and Scenic rivers.

Archeologically this proposal fails because it presumes to be able to build and create a working example of a transitional lifestyle upon a site which has in the ground beneath it the actual remains of many cultures and lifestyles. Chattooga Town was here and its artifacts remain here; we may be unable to perceive them but we owe it to future archeologists not disturb those places and things which they may be able to use to reveal more information. Many other old farmsteads which have actual existing buildings are in this area and we would do well to work towards preservation of these actual artifacts in their correct locations rather than make our own flawed recreation upon the site of an obliterated farm. History does not value the myopic creations of one generation's view of its past-it cherishes actual artifacts and sites which are held intact and passed down so that they may be reinterpreted by each generation with its own tools and context.

I appreciate the opportunity to comment on this plan and I hope that the Forest Service will continue to hold preservation and restoration as the highest goals. The temptation to sacrifice what we have inherited in exchange for something artificial and new because it promises ease, wealth and fame will ever be at odds with the true mission being a good steward. Those who are actually interested in exploring and understanding the treasures of ecology and history which are precious and preserved in the unique site which this proposal will forever impact are depending on you to pass on to them as intact a site as possible.

Sincerely,

Peter Peteet
267 Oxford Pl.
Atlanta, Ga. 30307
(404) 377-9262

Please call or e-mail me if you need any

verification of my identity.

From: Phyllis Jarvinen <phyllisjarvinen@yahoo.com>
Sent: Thursday, June 07, 2012 11:15 AM
To: FS-comments-southern-francismarion-sumter
Subject: Establishing a Southern Appalachian Farmstead in the Chattooga Wild and Scenic River Corridor
Attachments: Russell farmstead comments Jarvinen.docx

I emailed my comments to mcrane@fs.fed.us and then found this comments address - to to be thorough I will send my comments to both addresses,
please contact me at PO Box 522, Webster, NC 28788 828-226-4902 if you have any questions.
thank-you,
Phyllis Jarvinen

To:
District Ranger
Andrew Picens Ranger District
112 Andrew Pickens Circle
Mountain Rest, SC 29664

From:
Phyllis Jarvinen
PO Box 522
Webster, NC 28788
828-226-4902

Re: "Establishing a Southern Appalachian Farmstead in the Chattooga Wild and Scenic River Corridor":

To Whom it May Concern:

I am opposed to the plan to develop a southern Appalachian farmstead within the Chattooga Wild and Scenic River Corridor for numerous reasons:

1. It is within the Wild and Scenic River Corridor.
2. A site worthy of protection as one of America's historic and archeological resources would more appropriately be the Cherokee village wiped out by a smallpox epidemic in the 1700's. The isolated village site is one that preserves information about how the Native Cherokee lived before ongoing contact with whites.
3. During this time period the Cherokee buried their deceased loved ones in the village and so it contains **graves of Native individuals throughout the village site.**
4. The site is where native rivercane is being restored for use by Native Cherokee artisans – historically, rivercane was used in all types of Cherokee home and building materials.
5. The site is used by hunters, fisherman, hikers, boaters, and others seeking a quiet nature experience. Bringing more traffic, livestock, buildings, and the theme park would destroy the intent of the Wild and Scenic River designation and make finding a natural experience more difficult. Why not locate a theme park in a populated area that already has the infrastructure to support crowds? The place itself is important in the Wild and Scenic context but not in a theme park experience – why bring crowds there for an artificial experience when people can come on their own or in small groups for a **genuine nature experience**? A farmstead can be reproduced in a Dollywood like setting closer to a populated area and crowds can be accommodated there.
6. **The Chattooga** does not need a new management direction – it **needs protection** – its designation as a Wild and Scenic River is supposed to provide that protection.
7. Outsourcing the management of the "theme" park to Oconee Heritage Center – a non-profit group could be better served by seeking an alternate site for such a

- theme park. **It makes much more sense to preserve the theme of the river as place for quiet reflection, meeting nature on nature's terms, and having a wilderness experience.** It is close enough to the already existing roads and parking lot that you can easily go there for the day. Charging for "public access" makes the access private, not public.
8. The addition of sewage, parking lot runoff, animal waste, and reduction of stream buffers – no doubt including the native rivercane which exists all along the river banks – will **negatively impact water quality** in the Chattooga at the site and of course downstream where thousands of people swim, paddle, and participate in rafting trips every year.

A bit about my background:

I became familiar with the Chattooga River when I worked there in the 1980's for a rafting company – where I paddled and rafted the river regularly for 10 years.

I teach art history at a local community college and have been learning about and teaching the significance of Native American art forms by working with artists and cultural historians from Cherokee.

I participated in a rivercane restoration day at the Russell house site in March 2012 that was a cooperative venture between the USFS, the Chattooga Conservancy, and the RTCAR – Revitalization of Traditional Cherokee Artisan Resources. I walked all over the site. It should remain protected as the management plan now stands.

Please feel free to contact me if you have any questions about my comments.
Please protect the Chattooga River from development.
Sincerely,



Phyllis Jarvinen, MA, MFA

[REDACTED]

From: Jan Nash <janclay@windstream.net>
Sent: Wednesday, June 13, 2012 10:53 PM
To: FS-comments-southern-francismarion-sumter
Subject: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor

Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor

From: Jan Nash
2045 Persimmon Road
Clayton, GA 30525

Dear Ranger,

I ask that you reconsider your proposal for the Russell House Park on the Chattooga River and leave the area as it is.

We live in a world of limited and polluted natural resources, few protected natural areas, higher fees, closures, and reduced hours of established state and federal parks, and what seems to be a desire to spend money on projects just because one can allocate the funds even in lean economic times.

This Russell House historic site is located on a very remote stretch of road which will not ever be a sought after destination for its proposed purpose or final destination for travelers unlike other “farmsteads” have proven to be in heavily traveled locations. I find this proposal exploitive and harmful for the natural and aesthetic environment. Restoring this site for educational purposes sounds beneficial like our local Foxfire Heritage Center, but this area is too remote and was designated (pledged) to be protected.

Any restoration of farm land would have obvious and unavoidable repercussions on the river corridor – the entire fragile ecosystem. The Chattooga is a **magnificent** river that already faces threats to its water quality (Stekoa Creek), land uses (boater challenges), and ecology (Woolly Adelgid/Kudzu etc). **It needs to be protected and preserved.** It does not need additional traffic, asphalt, and foot traffic and put on display. Wild and Scenic designations must be upheld for everyone. This designation was made to protect what is so fragile, scarce, remote, “wild”, and unbelievably beautiful. We must protect our most treasure spaces before we have nothing left but parking lots and packaged thematic recreated outdoor parks. People visit this area to get away and to embrace what isn’t found elsewhere – the proposed park undermines all of this.

The Oconee Heritage Center is a fantastic resource and valuable community asset. You can see the pride and respect they have for their work. I hope they consider a great display at their museum and not bring harm to what land they so carefully try to represent. The northeast Georgia and Northwestern South Carolina region is captivating for its history, but one remote aspect that mostly vanished long ago would be better represented and displayed in a museum – not in a Wild and Scenic area.

Jan Nash



From: sarahirwin@windstream.net
Sent: Wednesday, June 13, 2012 6:52 PM
To: FS-comments-southern-francismarion-sumter
Subject: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor

My name is Sarah Irwin, I live at 191 Dovie Ray Rd in Dahlonega, GA 30533.

My family and I have been whitewater enthusiasts for almost 23 years. It is precious to us that we can come to the Chattooga without the bustle and encroaching of industry. Please, please do not encroach upon the Chattooga Wild and Scenic River corridor. Not only will it disturb natural species, but it will also invade the space of so many people who work to make it pure. There are so few places in the East where naturalists, whitewater enthusiasts, hikers, and backpackers can truly escape it all. Please do not take this from our community.

Sincerely,

Sarah Irwin

From: John Boshart <jboshart23@hotmail.com>
Sent: Wednesday, June 13, 2012 11:04 PM
To: FS-comments-southern-francismarion-sumter
Subject: "Establishing a Southern Appalachian Farmstead"

District Ranger
Andrew Oickens Ranger District
112 Andrew Pickens Circle
Mountain rest, SC 29664

Dear Sir:

I was shocked to hear of your consideration of the Establishment of a Southern Appalachian Farmstead in the Chattooga Wild and Scenic River Corridor. This suggestion should have been summarily rejected. It would be a violation of the Wild and Scenic Rivers Act and have a negative impact on the environment and water quality of the Chattooga River. It also would violate the management guidelines for designated recreational river sections of the Chattooga River. The 100 foot buffer must be maintained and if at all possible expanded. Your vote on this proposal must be "NO!"

Sincerely,

John Boshart
172 Black Bear Den Road
Clayton, GA 30562

From: Mark Stenger <mstenger@youdecide.com>
Sent: Thursday, June 07, 2012 4:29 PM
To: FS-comments-southern-francismarion-sumter
Subject: Farmstead center

Please don't move forward with this proposal. The Chattooga doesn't need this kind of negative environmental impact. We all love the Chattooga for it's wildness. Let's let nature continue to reclaim this area.

Mark Stenger | **YouDecide**
Insurance and Consumer Advisor
Atlanta | Boston | Richmond
mstenger@youdecide.com

From: Martin, Edward - NRCS-CD, Walhalla, SC
Sent: Friday, June 15, 2012 2:35 PM
To: FS-comments-southern-francismarion-sumter
Subject: FW: Appalachian Farmstead
Attachments: Farmsteadcomment12.pdf

From: Martin, Edward - NRCS-CD, Walhalla, SC
Sent: Friday, June 15, 2012 2:31 PM
To: 'comments-southern-francis-marion-sumter@fs.fed.us'
Subject: Appalachian Farmstead

Eddie Martin
District Manager
Oconee Soil and Water Conservation District
301 WS Broad Street
Walhalla SC 29691
Phone 864 638 2213
Fax 864 718 7750
e-mail: edward.martin@sc.nacdnet.net
website: www.oconeeswcd.org

OCONEE PRESERVATION
UNLIMITED STEWARDSHIP TRUST
730 JUMPING BRANCH ROAD
TAMASSEE SC 29686



Andrew Pickens Ranger District

District Ranger,

This letter is to inform your establishment that Opus Trust is in favor of the Appalachian Farmstead project. This project will be a good opportunity to interpret the land use from a farming standpoint in the southern Appalachians. This will also allow an expression of historic culture as the protection of the buildings which are now in various states of disarray can hopefully be cared for in proper context. We would suggest that the scope of the project be scaled down to a more manageable scale for the time being. Managing a five acre tract surrounding the existing buildings, stabilizing those buildings, creating an organic demonstration garden and clearing invasive plants so that the area can be easily accessed by foot traffic. The Chattooga River should not be encroached upon and its 100 foot buffer should remain in place. No parking lot should be built on the river side of Highway 28, but the land across the road from the original house site should be considered as parking for access to the farmstead. Creating an interpretive site at this location is a wonderful idea and should be planned according to a low impact procedure that will make sure no detriment comes to the river and that the focus be on a genteel experience of historical and cultural significance.

Board

Members:

Eddie Martin

Mark Chapman

Mali Hardy

Dennis Blakely

Lynne Martin

Steven Nix

Ernie Lombard

Sincerely,

Eddie Martin

President, OPUS Trust

From: John Boshart <jboshart23@hotmail.com>
Sent: Wednesday, June 13, 2012 11:07 PM
To: FS-comments-southern-francismarion-sumter
Subject: FW: "Establishing a Southern Appalachian Farmstead"

This has been forwarded due to typos in the original email

From: jboshart23@hotmail.com
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: "Establishing a Southern Appalachian Farmstead"
Date: Wed, 13 Jun 2012 23:04:28 -0400

District Ranger
Andrew Pickens Ranger District
112 Andrew Pickens Circle
Mountain Rest, SC 29664

Dear Sir:

I was shocked to hear of your consideration of the Establishment of a Southern Appalachian Farmstead in the Chattooga Wild and Scenic River Corridor. This suggestion should have been summarily rejected. It would be a violation of the Wild and Scenic Rivers Act and have a negative impact on the environment and water quality of the Chattooga River. It also would violate the management guidelines for designated recreational river sections of the Chattooga River. The 100 foot buffer must be maintained and if at all possible expanded. Your vote on this proposal must be "NO!"

Sincerely,

John Boshart
172 Black Bear Den Road
Clayton, GA 30562



From: James Nelson <nelsjm@bellsouth.net>
Sent: Monday, June 11, 2012 11:11 AM
To: FS-comments-southern-francismarion-sumter
Subject: Hooray for Chattooga Farmstead

Thanks for your wonderful idea to bring knowledge and a sense of history to more people. Don't let the selfish ones who want to limit access to this area spoil your plan. It's the kid who takes his ball and goes home or the kindergartener who grabs all the toys and screams "MINE!"

Such demonstration sites (like Roper Mountain in Greenville) are fabulous at broadening the experiences of children and adults alike. Your responsible stewardship is greatly appreciated!

Keep up the good work!

Jim Nelson

From: Greg <gphalf@gmail.com>
Sent: Friday, June 08, 2012 2:34 PM
To: FS-comments-southern-francismarion-sumter
Subject: I strongly oppose the permit for the Oconee Heritage Center on the Chattooga River

This is a poorly conceived and inadequately vetted plan. Besides the negative impacts to the forest area and the river, this plan is clearly at odds with any culturally or environmentally compatible usage of the area. It is a land grab of public lands for private usage.

The plan calls for what they consider Non Significant impact to the Wild and Scenic River, this includes using heavy logging techniques including building logging roads and log deck areas, cut timber, clear land, reconstruct 9 buildings,(they allowed to deteriorate over the years), grade out a parking lot, add 2 pit toilets bring in and reassemble 2 buildings, build replica farmhouse, a smokehouse, sawmill and sorghum mill/furnace and construct a residence with full utilities so a non government employee for Oconee Heritage Center can live inside the corridor. It is referred to as non-permanent because they permit is only good for 10 years and will have to be revisited. That is 17 buildings in some form of construction on site and many other changes that can never be unchanged in 10 years.

They will be allowed to use herbicides for at least 5 years and the critical river and stream buffers would be reduced from 100 feet to 40 feet. A full array of livestock and farm animals would be kept on site along with a working farm and garden. It states some runoff from large rain events would cause sediment and other materials to go into the river. Close streams would be altered to manage foot traffic.

The OHC would be allowed to hold festivals, interpretive events, demonstrations, any other fund raising events and any over flow from that new parking lot would go to the Hwy 28 boat launch parking lot and a new shuttle permit would allow them to take their visitors back and forth. This would displace anyone that wanted to go boating on those days. Not to mention they get to use free land at the taxpayer's expense and since they are a non profit they would pay no taxes.

A non government employee for Oconee Heritage Center can live inside the corridor, which is completely against policy. One of the new buildings would house a gift shop for selling Heritage Center and Forest Service items. The area would be available to only visitors of the site and those visitors would be restricted to that area. In a nutshell a portion of the corridor would be cut off from historical user groups.

This would require special amendments to the Chattooga Management Plan to allow all of the above non-legal changes to be made.

A formal and scientific capacity analysis has not been performed as ordered by the FS Chief in 2005 yet boating above Hwy 28 has a capacity of zero presently.

From: Al Battle - Comcast <al.battle@comcast.net>
Sent: Thursday, June 14, 2012 7:34 AM
To: FS-comments-southern-francismarion-sumter
Subject: Input regarding: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor

My name is L Alfred Battle. I am a resident of Atlanta, Ga and 1311 Tame Turkey Rd, Lakemont, GA and a member of the Chattooga Conservancy. I am writing to you concerning—“ Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor”

This proposal appears to be very ill-advised from the standpoint of preservation of an important ecosystem and in direct contradiction to the Wild and Scenic Rivers legislation and designation for the Chattooga. I have spent significant time at this river for the last 40+ years (since I could drive), and it is extremely disappointing to me that the Forest Service would allow such a change in character of this majestic river corridor. Also, the intended use appears to be one that could be allowed almost anywhere else in the National Forest with far less negative impact, so why ruin the natural beauty of the Chattooga corridor? In specific, I'd offer the following points:

- The proposed scale of development for the “farmstead” is **in violation of the management guidelines** for designated recreational river sections on the Chattooga River. These management guidelines **must not** be changed through a forest plan amendment.

- **The Wild & Scenic Rivers Act (WSRA) calls for non-degradation and enhancement of the resource,** and public expectations are aligned with this standard. The proposed “farmstead” is a theme park whose negative impacts directly conflict with river protection standards and guidelines, as well as public expectations for upholding WSRA mandates. Thus, the “farmstead” should not be permitted.
- The proposed “farmstead” would cause **unacceptable, localized degradation of the Chattooga’s outstanding resource values** of wildlife, botany, fisheries, recreation, scenery, and “experience” (i.e., sights, sounds and solitude). Therefore, the “farmstead” proposal should not be permitted.
- Sumter Forest Plan standards of **100-foot stream buffer protections must be maintained** in the Chattooga Wild & Scenic River Corridor, and reductions in these protections through a Forest Plan amendment must not be permitted.
- The claim that the Russell House site merits recognition on the National Register of Historic Places (NRHP) is **completely unsupported by any facts**. Therefore, the Forest Service’s purported “**need**” to restore and manage the old Russell farmstead to uphold NRHP standards **is invalid**, and is based on a false premise. Therefore, the “farmstead” proposal should not be permitted inside of the Wild & Scenic River Corridor.
- The proposed reduction of stream buffers would cause increased sediment loads and degradation of water quality, and negative impacts to fisheries and aquatic resources. Of special concern is the mussel species called the **Brook Floater**, *Alasmidonta varicosa*, whose population within the Chattooga River is of **global significance**. Brook Floater populations are only known from the vicinity of the Highway 28 Bridge and downstream—an area that overlaps with the proposed “farmstead” project area and its projected negative impacts. Sediment is the primary risk factor for damaging viable populations of the Brook Floater; therefore, the “farmstead” project and its projected increased sediment loads and localized degradation of water quality in the Chattooga River must not be permitted.

Please do not allow this development to occur on the banks of the Chattooga!

Al Battle

From: Tim Carlton <c1tim@yahoo.com>
Sent: Wednesday, June 06, 2012 10:13 AM
To: FS-comments-southern-francismarion-sumter
Subject: Oconee Heritage Center Farm Comments

Dear Sir or Madam;

Please allow me to make a few comments against the Oconee Heritage Center Farm proposed along the Chattooga River on Highway 28. The Chattooga River was designated a Wild and Scenic river to keep this type of encroachment from happening. Here are just a few reasons why this project is bad for the river:

1. Construction will introduce sediment to the river no matter how many steps are taken to abate it.
2. Agricultural run-off from the site will pollute the river.
3. Logging near the river will remove the buffer and the "wild and scenic" character of the river near the site
4. Additional traffic in the area will degrade access to the river corridor for other wilderness compliant users such as paddlers and fishermen

For such a special wild place to be made into a theme park is absolutely unacceptable. I hope that the Forest Service will do a thorough environmental analysis, and shut this project down in its tracks. Please do not "rubber stamp" this through due to political pressure like you have the continued de-facto boating ban above HWY 28. These two actions in conjunction will prove to me and many others that the Forest Service can be bought and sold, and that the protection of the river has nothing to do with the decisions made.

Thank you for your consideration

Tim Carlton
Greenville, SC

From: Garrick Taylor <garrick.d.taylor@gmail.com>
Sent: Wednesday, June 06, 2012 11:38 PM
To: FS-comments-southern-francismarion-sumter
Subject: Oconee Heritage Center has proposal within Wild and Scenic corridor

To whom it may concern,

Regarding the proposal from the Oconee Heritage Center to construct Southern Appalachian Farmstead within the Wild and Scenic Corridor of the Chattooga River, I feel that the proposal should be rejected in its entirety. The Wild and Scenic corridor was established to leave the river in a wild and scenic state. This proposal would create a significant and lasting impact that would degrade the wild nature of the river and permanently alter the scenic beauty along the corridor.

The construction and/or rehabilitation of 17 buildings is incompatible with the current uses of this corridor. Installation of vault toilets, a septic system, and a caretaker residence would also disturb the area. Construction of a 30 space parking area would disturb the area and lead to additional sediment flow into a wild and scenic river. Re-establishment of roadbeds and fields would take an area that has largely been reclaimed as natural forest and move it into a permanently disturbed state. The allowance for application of herbicides would inevitably lead to these chemicals flowing into an almost pristine wild and scenic river.

The use of a shuttle system to parking at the highway 28 bridge would dislocate historic users of the area (hikers, campers, anglers, boaters), reducing their access to the area.

The removal of trees to construct buildings, parking, and fields would lead to increased sedimentation in a wild and scenic river.

This tourist attraction does have a place but that place is not within the Chattooga Wild and Scenic corridor. I have been to the site and it has degraded to the point where there is little to no historic value left in the dwelling. The best possible outcome for this site would be to allow the forest to reclaim the area and return the Chattooga Wild and Scenic corridor to its more natural, undisturbed state.

The nearby Oconee State Park provides an area with a historic dwelling which already serves a similar purpose to the one in this proposal. Nearby attractions within the Smoky Mountains National Park (Cades Cove, Cataloochee, and Oconaluftee) already have historic displays similar to the ones in this proposal, making this proposal redundant and unneeded. Even if this was a unique historical display, its location within the Wild and Scenic corridor makes this type of resource intensive tourist attraction impractical and ill-advised.

Alternative 1 - current management is the only alternative which should even be considered. This project was first proposed in 2009 and met with significant public opposition - it seemed the project had been shelved only to return. Please permanently stop this project.

Thank you,

Garrick Taylor
Easley, SC

From: Laura Evans <cboater@earthlink.net>
Sent: Thursday, June 07, 2012 3:44 PM
To: FS-comments-southern-francismarion-sumter
Cc: Laura Evans
Subject: Oconee Heritage Center

I saw a post to BoaterTalk.com <http://boatertalk.com/forum/BoaterTalk/1052375132> bout the Forest Service proposing to permit the Oconee Heritage Center to construct non-permanent buildings on land within 100 feet of the Chattooga Wild and Scenic River Corridor AND to permit livestock on the property. The post also mentioned someone would be permitted to live on-site.

Please consider this email my formal protest to such arrangement, if indeed this is true. Wild and Scenic designation was created to preserve the wild and scenic nature of a precious national resource. No one should be permitted to violate that principle and we the people/government entities should not condone watering down of such standards. We must preserve those natural resources that are not yet tainted and do that forever. And, we should not compromise the quality of the water or environment surrounding the Chattooga River which is already protected from such threats.

Please do not let this proposal be realized and do not permit this facility now or ever within the current boundaries of the Chattooga's wild and scenic corridor. It is one of America's precious and pristine recreational resources.

Sincerely,

Laura Evans
1916 Marions Ford Road
Chapel Hill, NC 27516
919-967-3265
cboater@earthlink.net

From: John Ray <johnrraya@gmail.com>
Sent: Friday, June 15, 2012 9:53 PM
To: FS-comments-southern-francismarion-sumter
Cc: David Devoe; tedsnyderjr@bellsouth.net
Subject: Proposal for farmstead at the Russell Farm site along the Chattooga River

Dear Ranger Crane,

I am writing you concerning the proposed farmstead on the Russell farm area near the Hwy. 28 bridge.

I oppose any type of commercial activity like this on public land close to the Chattooga River. Let Oconee County find their own spot for this project and purchase their own land instead of trying to use public land. South Carolina only has a small amount of really nice public land and this area is one of the nicest. This project is totally at odds with the designation of the Chattooga as a wild and scenic River.

I find it difficult to comprehend how you could even consider such a use of this land, to spoil it for all those that will come to love the remoteness and natural beauty of the wild and scenic Chattooga.

Respectively,

John Ray
1190 Old Seneca Rd
Central, SC 29630

(Forest Service volunteer)

From: B & B Black <bblack109@bellsouth.net>
Sent: Wednesday, June 13, 2012 10:14 AM
To: FS-comments-southern-francismarion-sumter
Subject: Proposed Chattooga Farmstead Site

Good morning.

Please consider this a request to implement the proposed farmstead site. This would provide a window into past rural life along the river. There is plenty of river for the rafters and kayakers without denying those of us who wish to visit and reflect in a different manner.

This proposed site calls to mind the farmstead located at the entrance to the Great Smokey Mountains Park in NC. It is a wonderful tool of instruction for youth and adults. The proposed site in SC along the Chattooga would accomplish the same mission and would not impact the wilderness or the river.

Thank you for your consideration.
Betty and Bob Black

From: Bernie Boyer <mntimages@comporium.net>
Sent: Monday, June 11, 2012 9:54 AM
To: FS-comments-southern-francismarion-sumter
Subject: Proposed Theme Park For Russell Homestead

Dumb, dumb, dumb!

Ellsworth Boyer

From: Laurence Holden <art.laurence.holden@gmail.com>
Sent: Friday, June 15, 2012 2:17 PM
To: FS-comments-southern-francismarion-sumter
Cc: Mtopa@gafw.org; Lamar Marshall; Jim Kautz; jgatins@gmail.com
Subject: Public Comment on "Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor"

"Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor"

This project is ill conceived. It favors development over preservation. It rides on the upside down illusion that development IS preservation. It argues the fiction that the only way to preserve something is to develop it. It is based on the admission that since we haven't been able or capable of preserving it, then we can rely only on what we have shown ourselves capable of - developing it. This we think we are good at, even if we are most often hazy about the end it will meet.

If you can't create it, don't destroy it. When a forest is gone, you can't replace it. When a river is displaced, you can't reconstruct it.

"In a world where nothing is sacred, nothing is safe." - Christopher Camuto

We are busily constructing that world, and we no longer know for sure what it takes for something to be sacred. But when a thing is sacred, it is protected, and when it is protected it engenders ethical obligation - and sacrifice.

In the Wild and Scenic Rivers Act, preservation trumps development. Any other interpretation merely allows for avoiding the very purpose of preservation.

When the Russell site was listed on the Historic Registry in 1988, it became the responsibility of the Forest Service to protect and preserve it. It hasn't. The site, in many respects, is now a sad place, testament to this lack of will and conviction. Thus it is pure folly to believe the F.S. will now provide adequate oversight to some else's preservation and "enhancement" (i.e. the Oconee Heritage Center) As their master plan makes clear:

"Imagine coming around the bend beside the Chattooga River in 1900 in a stagecoach that left Walhalla early that morning. The long bumpy ride that took all day has worn you weary and the sight of a bustling farmstead comes as a relief on your journey up to Highlands, NC. This will be the beginning of the journey that visitors to the Southern Appalachian Farmstead will experience if all goes as planned....Many of the structures planned on being relocated for this project originated from Oconee County but not all of them. Several years ago, volunteers from the OHC relocated a dogtrot cabin from Elizabethtown, KY. Another cabin, originally from Gum Log, GA, had been moved to Westminster many years ago and was recently dismantled again and placed in storage. Even before the OHC opened in 2004, the collection of buildings and equipment for this project were being collected- choosing the site was one of the last pieces of the puzzle."

The Oconee Heritage Center is clearly interested in "replication." Which is a fine mission in itself, BUT NOT COVERING OVER AN ACTUAL HISTORIC SITE!

Don't continue to desecrate this site!

Respectfully,

Laurence Holden
266 Beck Lane
Clayton, Ga. 30525

Laurence Holden,
Laurence Holden,
Warwoman Creek,
Katuah Province, Turtle Island

laurenceholdenart@gmail.com

[The Artist's Path: On The Trail Between Art & Nature](#)

[Laurence Holden: Portfolio](#)

[TAKE ME TO THE RIVER: A BOOK OF POEMS & PAINTINGS FOR COMING HOME](#)

"I had assumed that the earth, the spirit of the earth, noticed exceptions- those who wantonly damage it and those who do not. But the earth is wise. It has given itself into the keeping of all, and all are therefore accountable." - Alice Walker

From: Elizabeth Airey <elizabethairey@gmail.com>
Sent: Thursday, June 14, 2012 11:39 AM
To: FS-comments-southern-francismarion-sumter
Subject: Public Comment on Southern Appalachian Farmstead Environmental Assessment
Attachments: Russell Farmstead project.pdf

Please read the following or see attached PDF.

District Ranger

Andrew Pickens Ranger District Office

112 Andrew Pickens Circle

Mountain Rest, South Carolina 29664

Re: Public Comment of Southern Appalachian Farmstead Environmental Assesment

Name: Elizabeth Airey

Address

: 311 Cherokee Ridge Rd. Tamassee, SC 29686

Email

: elizabethairey@gmail.com

To Whom it May Concern at the U.S. Forest Service,

I am very much in favor of the Russell Farmstead Project along the Chattooga River however, with a few suggestions and amendments. First, I would like to express that this initiative represents the valuable preservation of important cultural and historic resources in Oconee County. Hopefully this will help local residents and visitors understand and appreciate our areas unique resources.

I believe the proposed Farmstead plan should be re-evaluated to have a more positive affect in regards to the impact on the Chattooga's environment. To reduce that environmental and human impact, I feel the proposed size and location of the parking lot should be alerted to half the size and moved across the street from the site. I also do not see it wise to build more than two structures on the premises. I do not want to encourage unnecessary development that would have a definite negative effect on the areas vegetation and possibly allot excessive space for an estimated "crowd".

I strongly urge the USFS to maintain a strong, thick river buffer to prevent repetitive human foot traffic so close to the river, pollution, and erosion. The present proposal appears to radically decrease the vegetative riparian

buffer, which would prove detrimental to the natural environment and encourage unnecessary damage to a very sensitive riparian area.

I also find it very important for the USFS to require the Farmstead's managing body to follow a mandatory plan of removing any litter, unnatural debris and any animal feces (created in the "working farm" portion of the site) from the site on a frequent basis, so pollution and other unhealthy run-off into the river can be avoided.

Finally, I strongly recommend that any farming of livestock and crops be required to utilize organic, sustainable methods. Also, any landscaping maintenance of the entire Russell Farmstead site, be required to avoid harmful pesticides and weed killers that could potentially run-off into the river. Absolutely No toxic and non-natural chemicals should be allowed!

In conclusion, I am excited, impressed and proud of Oconee County for the proposal of this Russell Farmstead Project. It represents a fantastic opportunity for Oconee County to embrace our culture and history for all generations to appreciate. Preserving and operating this area with an environmentally sensitive agenda would act in harmony with the heritage we are trying to preserve. I support this proposal with the suggestions and proposed amendments included herein. Thank you.

Sincerely,

Elizabeth Airey

District Ranger
Andrew Pickens Ranger District Office
112 Andrew Pickens Circle
Mountain Rest, South Carolina 29664

Re: Public Comment of Southern Appalachian Farmstead Environmental Assessment

Name: Elizabeth Airey

Address: 311 Cherokee Ridge Rd. Tamassee, SC 29686

Email: elizabethairey@gmail.com

To Whom it May Concern at the U.S. Forest Service,

I am very much in favor of the Russell Farmstead Project along the Chattooga River however, with a few suggestions and amendments. First, I would like to express that this initiative represents the valuable preservation of important cultural and historic resources in Oconee County. Hopefully this will help local residents and visitors understand and appreciate our areas unique resources.

I believe the proposed Farmstead plan should be re-evaluated to have a more positive affect in regards to the impact on the Chattooga's environment. To reduce that environmental and human impact, I feel the proposed size and location of the parking lot should be alerted to half the size and moved across the street from the site. I also do not see it wise to build more than two structures on the premises. I do not want to encourage unnecessary development that would have a definite negative effect on the areas vegetation and possibly allot excessive space for an estimated "crowd".

I strongly urge the USFS to maintain a strong, thick river buffer to prevent repetitive human foot traffic so close to the river, pollution, and erosion. The present proposal appears to radically decrease the vegetative riparian buffer, which would prove detrimental to the natural environment and encourage unnecessary damage to a very sensitive riparian area.

I also find it very important for the USFS to require the Farmstead's managing body to follow a mandatory plan of removing any litter, unnatural debris and any animal feces (created in the "working farm" portion of the site) from the site on a frequent basis, so pollution and other unhealthy run-off into the river can be avoided.

Finally, I strongly recommend that any farming of livestock and crops be required to utilize organic, sustainable methods. Also, any landscaping maintenance of the entire Russell Farmstead site, be required to avoid harmful pesticides and weed killers that could potentially run-off into the river. Absolutely No toxic and non-natural chemicals should be allowed!

In conclusion, I am excited, impressed and proud of Oconee County for the proposal of this Russell Farmstead Project. It represents a fantastic opportunity for Oconee County to embrace our culture and history for all generations to appreciate. Preserving and operating this area with an environmentally sensitive agenda would act in harmony with the heritage we are trying to preserve. I support this proposal with the suggestions and proposed amendments included herein. Thank you.

Sincerely,

Elizabeth Airey

[REDACTED]

From: Sarajoy Booth <thebackwoodshoa@aol.com>
Sent: Thursday, June 14, 2012 4:30 PM
To: FS-comments-southern-francismarion-sumter
Subject: RE: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor

Why? Does our greed really overwhelm our passion for our environment? I cannot believe what my forest service is thinking. WHY?! Our environment needs all the help it can get, not have it's humans conquer it! Have we learned nothing from the past? How about trying to do good for our future generations, not just think selfishly. I am so upset at the lack of respect.

I hope this is all reconsidered and I hope we can "put our minds together and see what life we can make for our children."

Unfortunately I do not have the time to be sitting here telling you reasons why not to ruin our earth, they should be self-explanatory. Although I know people with money do not think logically or for the future for some reason, again unfortunately...

Thank you for your time, good luck, and may whatever forces there are have mercy on our souls.

Sarajoy Booth
2742 Damascus Church Road
Long Creek, SC, 29658

From: WILLIAM CLAY <clay_butch@bellsouth.net>
Sent: Friday, June 15, 2012 4:14 PM
To: FS-comments-southern-francismarion-sumter
Subject: Re: Establishing a Southern Appalachian Farmstead in the Chattooga Wild and Scenic River Corridor

To:

District Ranger Mike Crane
Andrew Pickens District Office
Sumter National Forest/USDA Forest Service
12 Andrew Pickens Circle
Mountain Rest, SC 29664

From:

Butch Clay
125 Apple Orchard Road
Mountain Rest, SC 29664

June 15, 2012

Re: Establishing a Southern Appalachian Farmstead in the
Chattooga Wild and Scenic River Corridor

I am writing to support the detailed substantive comments filed by the Georgia Forest Watch **against** the proposed preferred alternative presented in the US Forest Service EA entitled *Establishing a Southern Appalachian Farmstead in the Chattooga Wild and Scenic River Corridor*.

I strongly oppose the proposed actions as presented in the AP District's EA and "Preferred Alternative" on the basis that the project violates federal mandates to protect and enhance the Chattooga River and corridor.

I originally commented on this proposal to ask that no action be taken until an EA could be completed.

The EA that now has been presented to the public, though voluminous, never supplies sufficient justification or legal standing for turning these ecologically invaluable and historically rich **public** lands over for lease to a **private entity** for an exclusive entrepreneurial gambit that will inevitably impact the Chattooga Wild and Scenic River Corridor and the Russell Fields area in a detrimental way.

A couple of additional caveats:

The site of the Chattooga Town archeaology that was done by the University of Tennessee some years ago on Qualla phase Cherokee occupation of the area in question--a six (+) year project--

was conducted at the chosen site precisely because sites that contain Cherokee Council House remains and artifacts are rare. This is due to the fact that so many other important Cherokee river bottom sites have been inundated by reservoirs.

This area must be protected in perpetuity from precisely the sort of short-sighted project that has been proposed in the EA in question.

With all due respect to the good people of the Oconee Heritage Center, this proposed "transformation" of the cultural significant public area of the Russell Fields into a private, roadside tourist attraction is the single worst proposal that I have seen come out of the Andrew Pickens District office in my almost 30 years of active citizen involvement in Andrew Pickens National Forest issues. I try to give the Forest Service credit for the great amount of good that they do, day-to-day and over time. But in my view the USFS in this instance appears to be poised to utterly surrender their responsibilities to protect the public lands in their keeping.

I hope that this ill-conceived notion dies on the vine, but should it not I for one will seek to ally with anyone who cares enough about the Chattooga Fields environment to fight this proposal all the way to the Supreme Court, if necessary.

Thank You for your time.

Sincerely,

Butch Clay

From: Joseph Gatins <jgatins@gmail.com>
Sent: Friday, June 15, 2012 9:06 PM
To: FS-comments-southern-francismarion-sumter
Subject: Re: Establishing a Southern Appalachian Farmstead in the Chattooga Wild and Scenic River Corridor
Attachments: Farmstead Joe Gatins Letter.doc

District Ranger
Andrew Pickens Ranger District

See attached letter.
Joseph Gatins
2489 Glade Road
Clayton, Georgia 30525
706-244-1273 cell
706-782-9944 office

June 15, 2012

District Ranger
Andrew Pickens Ranger District
USDA Forest Service
112 Andrew Pickens Circle
Mountain Rest, South Carolina 29664

Re: Establishing a Southern Appalachian Farmstead in the Chattooga Wild and Scenic River Corridor

filed this date at comments-southern-francismarion-sumter@fs.fed.us

Dear District Ranger,

This is to signal my personal objection to the above proposal and to urge the Andrew Pickens Ranger District of the Sumter National Forest to both reject Alternatives 2 and 3 in the related Environmental Assessment and discard proposed Amendment No.2 to the Sumter National Forest Land and Resource Management Plan.

I am familiar with the area, having visited it numerous times and led the public on outings to what is indubitably a rich archeological and historic site – which is what it should remain.

The proposal to turn over management of this part of public lands in the Chattooga Wild and Scenic River corridor is both unseemly and unwise. It would commercialize and privatize a slice of territory that is owned on behalf of all Americans to a private, pay-for-play enterprise whose capabilities to even perform the necessary fundraising for this enterprise are not supported in the EA or other public documentation.

This also is to signal that I support and endorse, and hereby incorporate by reference, the separate letters filed in response to this proposal by the Chattooga Conservancy and Georgia ForestWatch, as I am a member of both conservation organizations.

I urge the Sumter National Forest to bring some common sense to the table on the issue and leave well enough alone.

Sincerely,

Joseph Gatins

From: C Coleman <cheethatrk@yahoo.com>
Sent: Monday, June 11, 2012 4:27 PM
To: FS-comments-southern-francismarion-sumter
Cc: Bradley, Paul -FS; cheethatrk@yahoo.com
Subject: Re: Southern Appalachian Farmstead Environmental Assessment
Attachments: farmcomments61112cc4.doc

June 11, 2012

District Ranger
Andrew Pickens Ranger District Office
112 Andrew Pickens Circle
Mountain Rest, S.C. 29664
comments-southern-francismarion-sumter@fs.fed.us

Re: Southern Appalachian Farmstead Environmental Assessment

Dear Sir,

In light of the ever increasing federal budget cuts and the depressed economic outlook of the country as a whole, I find the Southern Appalachian Farmstead Project fiscally ill conceived and completely void of enhancing or protecting the Wild and Scenic Chattooga River. Since only one entity has been allowed to send in a proposal, it seems rather singular and only local special interest, rather than a legitimate national policy ORV concern. I am deeply concerned about the historic Chattooga Indian site Chatuga Town and the fact it will be over run. I find the questionable cost analysis at the end of the EA frightening, in that it does not seem to raise a red flag, with you, of failure in this endeavor. I do realize that if you create the beginning of this boondoggle you can justify its abandonment on waiting on sufficient funding till it can be complete. I formally protest this project and the possible start with no finish Forest Service processes. I await the hopefully pending appeal process.

This project in another setting outside of the corridor, with better planning ,could be a great thing for Walhalla and Oconee county.

Please provide written answers for the following:

1. Who is paying for the initial reconstruction of the site the Forest Service has left deteriorating since 1970?
2. Where is the funding for the toilets, parking lot, private residence, logging, road construction and erasing, land clearing and most importantly the septic pump and compliant septic field required for the residence coming from?
3. Please provide all documentation of any marketing studies or cost benefit analysis to show where this tourism is financially statistically supported. Based on what information did these dollar values in the EA come from?
4. How will this tourism or fee dollars outweigh leaving the area in its present natural state?
5. With the shrinking Federal Budget, how does this project rank within the Forest Service Region? How much funding (tax dollars) has been sunk into this project so far and how much will the entire project cost, including inflationary increases over the lifespan of the project, eg the next 10 years?
6. Please provide the documentation of the proposal, budget, expected costs, funding and maintenance plan, formal business plan, and market analysis from Oconee Heritage Center (OHC) as provided to you to begin this assessment.

7. Please provide the names and titles of all Forest Service Officials that have given approval and support of such an expense of taxpayer dollars and the information they used/received to make a decision or judgment.
8. Please provide the formal information provided, scope and responses of all tribal leaders
9. Please provide all documents of the Cultural 106 Compliance, any issues and how they are being addressed.
10. Please provide architectural drawings and take offs of location, grading and runoff patterns.
11. What are the verbal and written responses from Governors, Congressional District members and the information they received describing this project.

Considering that present budget constraints are listed as the reason for campsites not being improved, lack of trash clean up more regularly, not updating existing toilet facilities, few trail improvements, and not updating basic informational literature, why is this money not being used for the basic Forest Service infrastructure --existing priority issues? As described in the Ea the end result will require extensive amendments to the present forest management plan as well as significant impacts to the resource.

The proposed project is so very inconsistent with Forest Service policy and the Wild and Scenic Rivers Act. The Southern Appalachian Farmstead (SAF) would require major significant amendments to the Forest Plan and as such will grant:

1. A private entity control over a portion of the Wild and Scenic River Corridor. That portion being within 40 feet of the river.
2. Reduce critical environmental buffer from 100 feet to 40 feet.
3. Allow logging, support roads constructed, heavy equipment, stream bed disturbance and all the silt and runoff issues.
4. The cutting for trees, clearing of land for introduction and support of live stock and ground altering gardening.
5. It would allow the OHC to have free reign, use of public lands and not required to pay taxes as a non-profit.
6. A private home would be allowed with a civilian caretaker in residence. (Tax free). The civilian would be allowed all social entertaining freedom as if on his or her own rented or owned private lands.
7. A new user group would be created, though there has been no formal capacity analysis, but ordered by the Chief in 2005. (how do you blatantly disobey orders?) A finding of Zero capacity is presently being maintained within the corridor at several locations with no analysis.
8. Historic users of resource will be restricted from accessing public lands they formally had access.
9. The Highway 28 boat launch parking lot could be appropriated by the OHC and SAF for “events”, “festivals” and “demonstrations”, completely restricting normal historic users from access to the river. A new shuttle permit would be created for such over reaching use.
10. An extensive septic system, pump, septic field and all the invasive issues they come with would be allowed inside the corridor.
11. Who will gain from the fees and merchandise sales OHC and SAF will be allowed to charge, has not been addressed.

The actual site construction and the tally of buildings by anyone’s count is 17.

Present in some state of deterioration

Main barn (if usable-otherwise a new one will be constructed)

Pig farrow

Log barn

Spring house

Small storage shed

Large storage shed

Small barn

Corn crib

Root cellar

Add ons

Gift shop
Farmhouse
Residence
2 pit toilets
saw mill
Sorghum mill and furnace
Smokehouse
And a 30 car parking lot and all the debris from vehicles

The takeover of federal land and taxpayers paying for a site that will become a Jamestown-esque commercial development on the Wild and Scenic Chattooga River has questionable aspects and issues. The EA's stating that the entire thing is non-permanent and in 10 years the permit could be rejected causing the buildings to be removed, is laughable. This is a major capital investment that cannot be judged as temporary. It is also an insult to everyone's intelligence to say the least and an arrogance of power abusing bureaucratic processes to say the most.

No normal business would ever consider such an unsecured risk. It is a non-destination and way off the beaten track for most any tourists to quantify need to seek that location. It has no close viable support system for those visiting. The "gain" for the resource as a ORV is negligible and has no supporting data to justify such a risk. The actual farm was a layover spot for rich vacationers traveling by coach on their way to the plush Highlands area, owned by people from North Carolina near Raleigh. Questionable historical value unless manufactured to fit a need.

This project might be a great idea on land outside of the corridor and not on the taxpayers' dime. A location more financially productive to insure the success and use of the historic interpretations should be examined. A junction of major roads, near the towns or in an area capable of supporting the visitors needs would be a more responsible decision.

At present this holds a future as an abandoned, financially inoperable eyesore and monument to poor planning and bad judgment within the Wild and Scenic River.

There is significant negative change, significant negative impact and financially irresponsible. As an agency given the charge of protecting the natural resources, set aside for the American Public to enjoy for future generations, as it is in its natural state and with no commercial development, this would be an outrage. Please consider the overwhelming negatives and question why this has become a project. Oconee county, Walhalla and the OHC may need more income, but at the taxpayers expense.

Thank you for your time and consideration.

Sincerely,
Charlene Coleman

3351 Makeway Dr
Columbia, S.C. 29201
cheethatrk@yahoo.com
803-254-3147

June 11, 2012

District Ranger
Andrew Pickens Ranger District Office
112 Andrew Pickens Circle
Mountain Rest, S.C. 29664
comments-southern-francismarion-sumter@fs.fed.us

Re: Southern Appalachian Farmstead Environmental Assessment

In light of the ever increasing federal budget cuts and the depressed economic outlook of the country as a whole, I find the Southern Appalachian Farmstead Project fiscally ill conceived and completely void of enhancing or protecting the Wild and Scenic Chattooga River. Since only one entity has been allowed to send in a proposal, it seems rather singular and only local special interest, rather than a legitimate national policy ORV concern. I find the questionable cost analysis at the end of the EA frightening, in that it does not raise a red flag of failure in this endeavor. I do realize that if you create the beginning of this boondoggle you can justify its abandonment on waiting on sufficient funding till it can be complete. I formally protest to this project and the possible start with no finish Forest Service processes.

This project in another setting outside of the corridor, with better planning ,could be a great thing for Walhalla and Oconee county.

Please provide written answers for the following:

1. Who is paying for the initial reconstruction of the site the Forest Service has left deteriorating since 1970?
2. Where is the funding for the toilets, parking lot, private residence, logging, road construction and erasing, land clearing and most importantly the septic pump and compliant septic field required for the residence coming from?
3. Please provide all documentation of any marketing studies or cost benefit analysis to show where this tourism is financially statistically supported. Based on what information did these dollar values in the EA come from?
4. How will this tourism or fee dollars outweigh leaving the area in its present natural state?
5. With the shrinking Federal Budget, how does this project rank within the Forest Service Region? How much funding (tax dollars) has been sunk into this project so far and how much will the entire project cost, including inflationary increases over the lifespan of the project, eg the next 10 years?
6. Please provide the documentation of the proposal, budget, expected costs, funding and maintenance plan, formal business plan, and market analysis from Oconee Heritage Center (OHC) as provided to you to begin this assessment.
7. Please provide the names and titles of all Forest Service Officials that have given approval and support of such an expense of taxpayer dollars and the information they used/received to make a decision or judgment.
8. Please provide the formal information provided, scope and responses of all tribal leaders
9. Please provide all documents of the Cultural 106 Compliance, any issues and how they are being addressed.
10. Please provide architectural drawings and take offs of location, grading and runoff patterns.

11. What are the verbal and written responses from Governors, Congressional District members and the information they received describing this project.

1.

Considering that present budget constraints are listed as the reason for campsites not being improved, lack of trash clean up more regularly, not updating existing toilet facilities, few trail improvements, and not updating basic informational literature, why is this money not being used for the basic Forest Service infrastructure --existing priority issues? As described in the Ea the end result will require extensive amendments to the present forest management plan as well as significant impacts to the resource.

The proposed project is so very inconsistent with Forest Service policy and the Wild and Scenic Rivers Act. The Southern Appalachian Farmstead (SAF) would require major significant amendments to the Forest Plan and as such will grant:

1. A private entity control over a portion of the Wild and Scenic River Corridor. That portion being within 40 feet of the river.
2. Reduce critical environmental buffer from 100 feet to 40 feet.
3. allow logging, support roads constructed, heavy equipment, stream bed disturbance and all the silt and runoff issues.
4. The cutting for trees, clearing of land for introduction and support of live stock and ground altering gardening.
5. It would allow the OHC to have free reign, use of public lands and not required to pay taxes as a non-profit.
6. a private home would be allowed with a civilian caretaker in residence. (Tax free). The civilian would be allowed all social entertaining freedom as if on his or her own rented or owned private lands.
7. a new user group would be created, though there has been no formal capacity analysis, but ordered by the Chief in 2005. (how do you blatantly disobey orders?) A finding of Zero capacity is presently being maintained within the corridor at several locations with no analysis.
8. Historic users of resource will be restricted from accessing public lands they formally had access.
9. the Highway 28 boat launch parking lot could be appropriated by the OHC and SAF for "events", "festivals" and "demonstrations", completely restricting normal historic users from access to the river. A new shuttle permit would be created for such over reaching use.
10. An extensive septic system, pump, septic field and all the invasive issues they come with would be allowed inside the corridor.
11. Who will gain from the fees and merchandise sales OHC and SAF will be allowed to charge, has not been addressed.

The actual site construction and the tally of buildings by anyone's count is 17.

Present in some state of deterioration

Main barn (if usable-otherwise a new one will be constructed)

Pig farrow

Log barn

Spring house
Small storage shed
Large storage shed
Small barn
Corn crib
Root cellar

Add ons
Gift shop
Farmhouse
Residence
2 pit toilets
saw mill
Sorghum mill and furnace
Smokehouse
And a 30 car parking lot and all the debris from vehicles

The takeover of federal land and taxpayers paying for a site that will become a Jamestownesque commercial development on the Wild and Scenic Chattooga River has questionable aspects and issues. The EA's stating that the entire thing is non-permanent and in 10 years the permit could be rejected causing the buildings to be removed, is laughable. This is a major capital investment that cannot be judged as temporary. It is also an insult to everyone's intelligence to say the least and an arrogance of power abusing bureaucratic processes to say the most.

No normal business would ever consider such an unsecured risk. It is a non-destination and way off the beaten track for most any tourists to quantify need to seek that location. It has no close viable support system for those visiting. The "gain" for the resource as a ORV is negligible and has no supporting data to justify such a risk. The actual farm was a layover spot for rich vacationers traveling by coach on their way to the plush Highlands area, owned by people from North Carolina near Raleigh. Questionable historical value unless manufactured to fit a need.

This project might be a great idea on land outside of the corridor and not on the taxpayers' dime. A location more financially productive to insure the success and use of the historic interpretations should be examined. A junction of major roads, near the towns or in an area capable of supporting the visitors needs would be a more responsible decision.

At present this holds a future as an abandoned, financially inoperable eyesore and monument to poor planning and bad judgment within the Wild and Scenic River.

There is significant negative change, significant negative impact and financially irresponsible. As an agency given the charge of protecting the natural resources, set aside for the American Public to enjoy for future generations, as it is in its natural state and with no commercial development, this would be an outrage. Please consider the overwhelming negatives and question why this has become a project. Oconee county, Walhalla and the OHC may need more income, but at the taxpayers expense

Sincerely,

Charlene Coleman

3351 Makeway Dr
Columbia, S.C. 29201
cheethatrk@yahoo.com
803-254-3147

From: Bone, Michael <Michael.Bone@arcadis-us.com>
Sent: Friday, June 08, 2012 6:41 PM
To: FS-comments-southern-francismarion-sumter
Subject: Regarding Chattooga "Theme Park"

Dear USFS and to whom it may concern,

Please do not allow the "Farmstead" project or whatever you are calling it to happen.

You won't allow boaters to paddle the upper Chattooga River, which is preposterous given it is a navigable waterway and not your property, but you are going to allow and endorse this?

I have about had it with the USFS and their mixed signals on boating vs. fishing and now development! Come on guys, this is ridiculous, protect the river corridor!

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5367530.pdf

I hope your organization in all of its governmental wisdom will reconsider. Do not set act like you are protecting the river from kayakers (who will care for the stream) and then allow more development along it's "Wild and Scenic" protected corridor.

I have enjoyed the Chattooga and it's serenity for years and I hope you will protect it by not setting a precedent for future money hungry and greedy developers.

Respectfully,

Michael Bone

Michael Bone | Geologist 2 | michael.bone@arcadis-us.com

ARCADIS U.S., Inc. | 30 Patewood Drive, Suite 155 | Greenville, SC 29615
M: 864 293 6408 | T: 864 987 3919 | F: 864 987 1609
www.arcadis-us.com

ARCADIS, Imagine the result

Please consider the environment before printing this email.

NOTICE: This e-mail and any files transmitted with it are the property of ARCADIS U.S., Inc. and its affiliates. All rights, including without limitation copyright, are reserved. The proprietary information contained in this e-mail message, and any files transmitted with it, is intended for the use of the recipient(s) named above. If the reader of this e-mail is not the intended recipient, you are hereby notified that you have received this e-mail in error and that any review, distribution or copying of this e-mail or any files transmitted with it is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete the original message and any files transmitted. The unauthorized use of this e-mail or any files transmitted with it is prohibited and disclaimed by ARCADIS U.S., Inc. and its affiliates. Nothing herein is intended to constitute the offering or performance of services where otherwise restricted by law.

From: Brian Carver <bcarver@mindspring.com>
Sent: Thursday, June 07, 2012 6:27 PM
To: FS-comments-southern-francismarion-sumter
Cc: CCC List; FPC List
Subject: Regarding Oconee Heritage Center Russell Farm Historic Site

Dear Sirs,

My heritage is the Appalachian Mountains. While I do applaud the idea of extending Appalachian heritage through the Russell Farm Historic Site, I do have to question the plan's impact to the Chattooga Wild and Scenic River Corridor.

As quoted from the plan "The proposal also includes a non-significant amendment to the 2004 Revised Land and Resource Management Plan, Sumter National Forest to allow restoration of the original farm landscape that included historic gardens, agricultural fields and livestock pastures." I am very alarmed with the wording "non-significant."

Any farms is an open system. That means exported product must be balance with imported goods. For example, produce must be balanced with fertilizer. To properly maintain this balance requires the movement of material which will impact the local environment. The application of fertilizer will result in runoff regardless if it's a commercial product or cow poo. This can and will impact the river.

Adding animals to the farm produce increase the rate of change to the micro-environment. This will of course extend to the broader environment of the Wild and Scenic River Corridor. It's hard to balance the right size feed area for an animal and most farmers need to import food stock. Again more movement of material in and out of a delicate preserve.

I live off of Cane Creek in Oconee Co. That creek constantly lowers the water quality into Lake Keowee. Partial causes point to farms bordering the creek. To me, that is just an other example how difficult to manage farm land and feeding into a watershed. Granted it can be done safely and the proposed plan does not address procedure and process for a working farm. Just think of the rain falling directly on a cow pasture and run off right into the river. Would you drink that water?

Brian Carver
West Union, SC

From: Nicole D. <nicole.devillier2607@gmail.com>
Sent: Thursday, June 14, 2012 9:24 AM
To: FS-comments-southern-francismarion-sumter
Subject: Regarding plans for the Chatooga

Dear sir/mam,

My name is Nicole Devillier, and like many, the Chatooga river has run deep canyons through my heart. My Grandfather, brother, sister, and cousins have experienced many a bonding-moment, whitewater rafting on that river, that have saved and recreated our relationships to each other.

I recently read about the plans to, regardless of how semantically dressed-up or rephrased it is, go against the natural protection laws in place, in order to turn portions of this "protected" land into something more "profitable". Do not think that it goes unnoticed that the parking lot and cow fields necessary to create this "financial surplus" will cause car, human and bovine waste to run off into the river, infecting the circle of life. However, not only will it further deteriorate our limited natural resources, but the economical cycle, as well.

The peace and purity of this place touches each person that has had the opportunity to experience its pristineness. I have never ceased to appreciate the fact that a group of 20-30 people can float down certain portions of this majestic river in stunned awe and absolute silence, as their love and respect for this quintessential piece of natural, unadulterated America deepens. These plans to build upstream from most rafters' and kayakers' push-off points will destroy this river and its many appeals. People who travel down the Chatooga accept the risks of being thrown into the rapids of its crystal clear waters, as they paddle down it. Many jump in, voluntarily, to envelop themselves in its cleansing purity. This is a chance to experience the true awesomeness of Mother Nature.

Very few people will want to even risk being splashed by water contaminated with sewage, litter, and parking lot run-off. Now, I may be jumping to conclusions here, but the majority of tourism (and in turn, money, to put it in terms these developers may understand) in this area is brought in by people enamoured by this place, and looking to experience it in a respectful manner (i.e. rafters, kayakers, campers, hikers, etc.). This "historical landmark" to be erected will, undoubtedly, marr the beauty of this area, discouraging people to return and spend more time (Hey! And money! Look at that!) here.

This is a slippery slope to go down. Less people means less money means less protection for this national treasure. By beginning development here, all that is done is to set up a path for further future development, until the river is choked, the animals are conquered, and the trees and mountains are levelled. The whole area will, eventually, be absorbed into the great concrete jungle.

Please do not allow this construction to occur. It will be the beginning of the end, here.

All my prayers and hope,
Nicole E. Devillier

From: adam hackenberg <adam.m.hackenberg@gmail.com>
Sent: Saturday, June 09, 2012 5:01 PM
To: FS-comments-southern-francismarion-sumter
Subject: russel farmstead

I disagree with the project, because the simple fact that the only reason the chattooga has been preserved is because of the lack of commercialism in the headwaters, which is what the Russell house was. the time period it was built is not even that respectable far into the past, there are other residencies of more modest stature that preserve and show, a more common living of our ancestors in the upstate, not that of a select and rich few. it remains to be the only field, which lays along side the chattooga, a field which serves no use to enhance the wild and scenic river, and only brings a person back to the modern circumstance of our recent societal living. should we be bringing out human traces upon this land or letting them fall to forests? i wish to support the latter. the only reason this house is respected is because of falling structures, why are the native americans that shared the same soil for much longer, coming from a completely separate culture standpoint which continues to be foreign in its differences from today, not respected? because of structure and the tangible fantasy of colonial living, that of the rich. what does the river corridor lack? structures, unless you count trees as so, it should be kept like that, there's not many of these areas left, and would be more historical to be kept pure.



From: Mark Gould <Mark@steomatic.tv>
Sent: Thursday, June 14, 2012 8:01 AM
To: FS-comments-southern-francismarion-sumter
Subject: Russell House development

NO NO and NO

You are forest service NOT a theme park. DO NOT do this

[Mark N. Gould](#)



From: Leslie, Ron <rleslie@piedmont.edu>
Sent: Friday, June 15, 2012 9:46 AM
To: FS-comments-southern-francismarion-sumter
Subject: russell house project

I am a member of the Chatooga Conservancy and I basically support this project. Care needs to be given to limit the use of herbicides, and not make the river (as opposed to the pioneer homestead), the focus of the construction. If the focus remains the Russell House location, there should be adequate space within that area to construct parking which does not place stress on the river environment.

It would be of considerable benefit to our young people to have the availability of a “true” depiction of early farm life. It may be useful to remember that this land was tilled as one of many contiguous farms which ranged from the North Carolina border into the more settled piedmont region of South Carolina. These people often prospered under difficult circumstances.

It would be equally beneficial if an adjacent area could be maintained representative of the early Cherokee culture.

Sincerely,

Ron Leslie

3855 Highway 28 North

Clayton, Georgia 30525

From: Carolyn Kidd <jikidd@windstream.net>
Sent: Friday, June 15, 2012 1:30 PM
To: FS-comments-southern-francismarion-sumter
Subject: Russell House proposal

My comments are simple. There is already too much public use and impacts on the wild and scenic river as is. I am opposed to the idea of a farmstead being opened in the old Russell fields. We already have plenty of these type of opportunities available for the public. We have very few wild and scenic rivers. My opposition is not tied to issues like reducing the buffer, etc and other specifics, it is very simply the overuse of this area by people.

I am very opposed this proposal. It is not good for the public nor for the river itself or the wild experiences on the river like trout fishing and boating. Too many areas of the National Forest are already over used and the agency does nothing about it. Take a close look at the Burrells Ford area above the bridge. You folks are all talk and no action when it comes to managing the forest where there are problems. The use in this area has exploded and the resource shows it. The same will happen in the 28 bridge area if this proposal is allowed. Jim Kidd – Clayton, Georgia

From: Aron Wehr <jwehr@mac.com>
Sent: Wednesday, June 06, 2012 7:45 AM
To: FS-comments-southern-francismarion-sumter
Subject: Southern Appalachian Farmstead = worst idea ever

To whom it may concern (which in a way includes me),

I am strongly against any plan that changes and alters this beautiful wild and scenic corridor along the Chattooga River. There is no way that in 10 years all the buildings and structures will be removed, at best they might just be abandoned. Please do not let this plan go any further.

Sincerely,
Aron Wehr

From: Kevin Colburn <kevin@americanwhitewater.org>
Sent: Tuesday, June 05, 2012 2:23 PM
To: FS-comments-southern-francismarion-sumter
Subject: Southern Appalachian Farmstead EA Comments
Attachments: 2012.06.05 Final AW Farmstead Comments.pdf

Hi Mike,

Please accept American Whitewater's comments on the Southern Appalachian Farmstead Environmental Assessment. Thanks for considering these ideas. As we shared in our comments, we are not opposed to the idea of the farmstead, but object to it being built and operated on the banks of the Chattooga WSR, and to it being considered for approval at this time.

Kevin Colburn
National Stewardship Director
American Whitewater
2725 Highland Drive
Missoula, MT 59802
kevin@americanwhitewater.org
(O) 406-543-1802
(C) 828-712-4825
[***Join American Whitewater!***](#)



www.americanwhitewater.org

Kevin Colburn
National Stewardship Director
2725 Highland Drive
Missoula, MT 59802
406-543-1802
kevin@americanwhitewater.org

June 5, 2012

District Ranger
Andrew Pickens Ranger District Office
112 Andrew Pickens Circle
Mountain Rest, SC 29664
comments-southern-francismarion-sumter@fs.fed.us

Re: Southern Appalachian Farmstead Environmental Assessment

Dear District Ranger Crane,

American Whitewater believes that the preservation of the remaining historical structures at the Nicholson Farm would protect and enhance the historical values of the Chattooga Wild and Scenic River. The proposed action within the Southern Appalachian Farmstead Environmental Assessment however would unacceptably impact historical, recreational, scenic, water quality, and other values. The proposed action is also inconsistent with Forest Service policy and the Wild and Scenic Rivers Act. We are not opposed to the concept of the farmstead, we simply do not feel that it can or should be sited in the Wild and Scenic Corridor on federal lands.

1. The proposed action wrongly grants a private entity the right to charge the public fees for visiting a portion of the Chattooga WSR corridor.

The proposed action would grant a private entity authority to charge fees for visiting a historically and culturally important portion of the federal Wild and Scenic River corridor.¹ Thirty new parking spaces would be signed for visitation of the farmstead only.² We are unaware of any federally owned portion of any Wild and Scenic River corridor in the Country under private control, from which the public is barred from access unless they pay a fee. In fact, we believe this would constitute a violation of USFS policy, the WSRA, and the public trust.

2. The proposed action inappropriately considers and grants additional visitor capacity to the Chattooga WSR, absent a final visitor capacity analysis.

The proposed action would intentionally and significantly increase recreational use of the Upper Chattooga River, including through special events featuring “Appalachian music,

¹ See EA page 19

² See EA page 18

quilting bees, barn raisings, cooking sorghum and farming and lumbering.”³ This increased use would exist in a portion of river where the USFS dramatically and artificially increases use through stocking massive numbers of exotic trout for angling – and where the USFS believes the capacity of the river to support paddling use is zero. Banning paddling (a direct limit) while proposing a large new use (a direct attractant) violates USFS policy (see USFS Manual 2354.4), and is arbitrary and capricious.

Through use of fencing and prohibitions the EA claims that farmstead visitors will be prevented from visiting the Chattooga River and thus claims the capacity for the site should be viewed separately from the capacity of the river corridor. We disagree. First, the farmstead is in the river corridor and thus visitors to the farmstead are visiting the corridor. Second, many visitors to the farmstead will invariably want to visit the river, resulting in increased visitation.

Furthermore, now is an inappropriate time to consider this proposal. The 2004 LRMP as it related to recreation on this section of the Chattooga River was overturned by our (American Whitewater’s) appeal. The Regional Office of the USFS was ordered on appeal in 2005 to conduct a user capacity analysis and issue a new decision. That decision is currently under administrative appeal, and overarching and directly relating capacity decisions are under judicial review. The USFS should not be allocating uses absent a legitimate user capacity analysis – which will not be in place until at least the resolution of pending litigation and administrative appeals. To do so violates the 2005 AW appeal decision, the WSRA and the FSM which require a visitor capacity analysis as the basis for capacity related decisions.

3. The proposed action wrongly supports commercial exchanges within the WSR corridor.

The proposed action grants a private entity the authority to sell commercial goods and services within the Wild and Scenic River Corridor. At least one of the “historic buildings” would include a “sales area” with phone and electrical service.⁴ We see no need for this commercialization of the river corridor, and believe that a gift shop would not protect or enhance the values of the Chattooga Wild and Scenic River.

4. The proposed action wrongly allows construction and inhabitation of a new private residence within the WSR corridor.

The proposed action includes the construction of a new full-time “caretaker residence” in the Wild and Scenic River corridor for an employee of a non-federal entity. This house would be supplied with water, electric, septic, and phone utilities. We do not feel that building a house in the federal WSR corridor for a private citizen to live in for any purpose is consistent with the Wild and Scenic Rivers Act or USFS policy.

³ See EA page 9

⁴ See EA Page 18 and 19.

5. The proposed action wrongly allows riparian area clearing and use within the WSR corridor.

The proposed action includes the creation and maintenance of “gardens, agricultural fields and livestock pastures” within a short (40 feet) distance of the Chattooga WSR.⁵ These activities would “remove stream buffers.”⁶ Removing stream buffers, corralling livestock, and clearing land in such close proximity to the upper Chattooga River are in concert expected to negatively impact water quality and scenic values of the river, and would thus be in violation of the Wild and Scenic Rivers Act.

6. The proposed action wrongly eliminates legitimate recreational access to the WSR corridor, impacting the recreation ORV.

The proposed action would include elimination and privatization of current recreational parking and access. The proposal would create a new recreational use that is not related to the WSR, and in fact farmstead visitors would be prevented from actually visiting the river by: “site management, indirect regulation of use and direct regulation of use (FSM 2354.41a). Actions could include but are not limited to designing the parking lot with a gate that could be closed, information signs and time-limited parking spots for SAF visitors.” In other words, river users would be fenced out and otherwise legally prevented from enjoying the historical site and farmstead visitors would be prevented from visiting the river. In short, the proposed recreational area (farmstead) has nothing to do with the Chattooga WSR and should not be sited on its banks (See FSM 2354.4).

In addition the proposed action would allow the private entity managing the farmstead to appropriate the Highway 28 river access area for special events. This action would likely prevent legitimate river use on peak use or even average use weekends. This effect would impact the recreational ORV.

7. The proposed action wrongly allows impacts to a historical and pre-historical site, impacting the history ORV.

The proposed action would radically impact the historical ORV of the Chattooga River by introducing new buildings to a historically and prehistorically important site (a total of 12-16 buildings). This action would not protect, restore, or enhance the historical values that caused the river to be designated but would instead obscure the historic and prehistoric landscape with buildings shipped in from elsewhere as well as with new construction.

Conclusions:

Creating a private theme park on federal lands on the banks of a Wild and Scenic River is not appropriate. To do so impacts – rather than protects and enhances – the values that

⁵ See EA pages 9 and 17.

⁶ See EA page 9.

caused the Chattooga River to be included in the Wild and Scenic River System. We are not opposed to the farmstead project – it sounds like an interesting celebration of southern Appalachian history – but the project does not need to be, nor should it be, constructed and operated on the banks of the Chattooga Wild and Scenic River.

Sincerely,

A handwritten signature in black ink, appearing to read "K. R. Colburn". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kevin R. Colburn
National Stewardship Director
American Whitewater

From: Darren Wolfgang <dwolfgang@gafw.org>
Sent: Friday, June 15, 2012 5:03 PM
To: FS-comments-southern-francismarion-sumter
Subject: Southern Appalachian Farmstead Environmental Assessment
Attachments: 12.06.15_GFW.Comments.Southern.App.Farmstead.EA.pdf

Dear District Ranger,

Please find Georgia ForestWatch's comments (attached) regarding the Southern Appalachian Farmstead Environmental Assessment.

Regards,

Darren

Darren Wolfgang
Forest Ecologist
Georgia ForestWatch

(706) 635-8733
www.gafw.org



15 Tower Road
Ellijay, GA 30540

P 706.635.TREE (8733)
F 706.636.1371
E info@gafw.org

www.gafw.org

June 15, 2012

District Ranger
Andrew Pickens Ranger District
USDA Forest Service
112 Andrew Pickens Circle
Mountain Rest, South Carolina 29664
Comments-southern-francismarion-sumter@fs.fed.us
864-638-9568

Re: Establishing a Southern Appalachian Farmstead in the Chattooga Wild and Scenic River Corridor- Environmental Assessment

Dear District Ranger,

Georgia ForestWatch (GFW) appreciates the opportunity to comment on this proposal which seeks to construct and restore a Southern Appalachian farmstead at the Russell Tract. ForestWatch is a non-profit forest conservation and member organization dedicated to promoting naturally self-sustaining forests and watersheds within the national forests in Georgia, to educate and engage the public in these efforts and to promote preservation of this legacy for future generations. Our members and volunteers often have visited the SAF site and the existing Russell Farmstead Site and nearby Ridley Field site and led public hikes to the area to educate the public to the site's rich historical and archeological values, including the sagas of the original European settlers (primarily the Nicholson and Russell families) and their Cherokee predecessors at Old Chattooga Indiantown.) This proposal is within the scope of our interests because it lies within the Chattooga Wild and Scenic River corridor and is adjacent to the Chattahoochee-Oconee National Forest.

ForestWatch supports the basic concept of preserving the culture and heritage of the Southern Appalachians. However, upon review of the Environmental Assessment, we have several concerns about the project as it is currently proposed (Alternative 2), as well as the almost identical Alternative 3.

This entire area, including the 20 acres targeted for re-transformation into a *circa* 1875-1925 working farm, represents a key outstandingly remarkable value of the Wild and Scenic Chattooga River Corridor. Attempts to try to dramatically increase use and visitation (by creating a tourist destination) while enabling a private entity, the Oconee Heritage Center (OHC), to charge parking and entrance fees to public land is not a good idea at this location. The district's Farmstead Proposal would, apparently for the first time, restrict free and unfettered public access to forestland owned by the Nation, and its people and essentially privatize land owned for the benefit and enjoyment of all Americans. It would also further commercialize the corridor, which we find objectionable.

In fact, the district's and OHC's revised proposal to put a farmstead themed interpretive center/park in this area (cited as Alternatives 2 and 3 in the EA), is surprising, given that it would run counter to federal laws and the U.S. Forest Service's own management plans and procedures.

These concerns and substantive, related comments, involve:

- The Wild and Scenic Rivers Act (1974)
- The 1976 Federal Register Notice and PL 93-279 designating the Chattooga River as Wild and Scenic, and subsequent management and development plans
- The January 2004 Land and Resource Management Plan for the Sumter National Forest and subsequent amendments
- U.S. Forest Service watershed and native vegetation protection standards
- The National Environmental Policy Act
- Standard agency procedures for involving the public in issuance of Special Use Permits (SUP)
- The fact that the district and the OHC have mistakenly based their informal agreement on the premise that the SAF will be located at a site that is no longer eligible for the previous National Register of Historic Places (NHRP) designation. (** see discussion on pp. 8-9, below*)

We ask the district and its deciding officer to consider the following reasons for abandoning the Farmstead Proposal (whether under Alternative No.2 or 3), and shelve the related proposal for an Amendment No. 2 to the Sumter National Forest LRMP.

The Farmstead Proposal runs counter to tenets of the Wild and Scenic Rivers Act and specific designations for the Chattooga, including the 1976 Federal Register Notice for the Development of the Chattooga Wild and Scenic River.

Primary emphasis is to be given under these federal mandates to “preservation of its esthetic, scenic, historic, archeological and scientific features.” There is no mention of a fee-based park managed by a private organization in this emphasis. The original development plans also noted “there is no permitted grazing within the river corridor on national forestlands,” which suggests the district has not done proper homework when it proposes to allow livestock penning and grazing as part of the OHC Farmstead Proposal. The 1974 Wild and Scenic Rivers Act, moreover, serves to protect for future generations those rivers that possess “outstandingly remarkable scenic, recreation, geologic, fish and wildlife, historic, cultural or other similar values.”

The Farmstead Proposal runs counter to the 2004 Land and Resource Management Plan for the Sumter National Forest ...

... and specifically Prescription 2.A.3 for Designated Recreational River Segments of the Wild and Scenic Chattooga River. One of the designated conditions for that management prescription states that “existing old fields and openings for wildlife may be present and maintained, but no creation of new permanent openings of this type occurs.” It thus makes little sense for the agency to both approve of and promote the expansion of such openings with the Farmstead proposal, given its own management guidance to the contrary. It is important to point out that

the proposed farmstead will convert existing old fields and openings that are currently maintained for wildlife to those with more agrarian purposes, subject to soil disturbances, such as compaction from livestock, plowing, and erosion.

The Farmstead Proposal reduces stream buffers from 100 feet to 40 feet.

This proposal will affect perennial and intermittent streams, seeps, wetlands and ditch lines on the Farmstead Proposal land and increase the probability of sedimentation (largely from land clearing and a proposed timber sale) into the main channel of Section II of the Wild and Scenic Chattooga. It would also increase the probability that fecal coliform and nutrient-laden run-off from the many “saddle, pack or draft animals” and “horses or other livestock” in the Farmstead Proposal area (EA, at p. 17) would end up in the main river and negatively impact its water quality. Along these lines, we do not support the tethering or corralling of pack, stock, or draft animals within 100 feet of any stream course.

What the district terms a “non-significant amendment” to the Sumter National Forest Land and Resource Management Plan, allowing the tethering and use of livestock on the site is, would undo Wild and Scenic Chattooga management objectives and standards that largely have stood the test of time for more than 35 years.

We do not support modification to and reduction of the Forest Plan’s existing riparian corridor minimum buffer widths, and believe a 100-foot riparian buffer should be adhered to for water quality protection. If any trees are removed within the riparian zone, at a minimum the South Carolina Streamside Management Zone (SMZ) guidelines for Trout Waters recommend that the primary SMZ buffer be increased to 80 feet. We believe this should include a no-harvest zone within the first 25 feet of primary or secondary trout streams. Timber harvest within the remaining 55 feet of the buffer should leave an average of 50 square feet of basal area per acre or at least 50% canopy cover. Alternatively, an average of 50 square feet of basal area per acre could be evenly distributed throughout the zone to provide shade, and buffer against sediment and nutrient pollution. If less than 50 square feet of basal area exists, all trees within 100 feet of any stream course should remain. While the SMZ guidelines permit tree removal in riparian areas, we would prefer that little or no management occur within 80 to 100 feet of the river.

In addition, we note that a separate NEPA consultation and assessment process is required to adjust management prescription boundaries “where the change could potentially negatively affect Outstandingly Remarkable Values, of streams meeting the eligibility requirements of Wild and Scenic River Designation,” according to an exception to the Sumter National Forest Land and Resource Management Plan (at p. 2-31, standard FW-101.) This standard suggests that reducing the buffer prescriptions in this area would require a separate, non-project specific Environmental Assessment.

Lack of specific information about the proposal and associated management, mitigation, and maintenance plans.

It is impossible to conduct an accurate effects analysis of a proposed action if the details of the proposed action are not available for review. At a minimum the EA should discuss:

- Manure management plans: Will manure be removed regularly from the site? If not, how will it be composted? Will “bio-swales” or living catch ponds/ditches be used to contain and filter run off from surrounding fields, hog farrows, and other animal stalls?
- Proposed agricultural methods: Little to no information is provided regarding plowing methods, crops to be planted, fertilization types and techniques, crop rotation, and cover cropping systems proposed for implementation. Will all methods be 19th century based?
- What tools, techniques, and animals are proposed to work and maintain the farmstead? (e.g. scythe, sickle mowers, walk plows, horses, mules, oxen, etc.)
- How are agricultural styles/methods projected to alter wildlife habitat/use of the area? As evidenced in the 20th century, the rise of industrial/mechanized farming led to the cutting and removal of windrows and riparian buffers to maximize tillable acres. We hope this proposal will maintain/restore such windrows and wooded corridors.
- No information is provided regarding the amount and type of animals projected to be on site, and associated rotational grazing systems to be implemented (if any) to maintain site integrity and productivity.

The Farmstead proposal and its associated land clearing will serve as a vector for greater expansion of Non-Native Invasive (plant) Species (NNIS).

The district in recent years has expanded and repeated its efforts at trying to control the spread of NNIS on this land and adjacent portions of the Russell Fields, and wisely initiated and approved a project permitting expansion of giant native cane (*Arundinaria gigantea*) on the Russell Fields lands. These meritorious efforts could be endangered by another round of NNIS invasion brought in by the land clearing and subsequent farmland management projected in the EA. We ask that mechanical and other means of control be used to control NNIS in the 100-foot stream buffer zone, with judicious use of herbicides as necessary.

Economic and social viability of proposed farmstead.

The EA indicates that Federal funding of this project will sunset 10 years after initiation. We wonder if spending a substantial amount of monetary and labor resources is a wise decision given the previous low use and tragic destruction of the Russell house following a similar attempt and eventual abandonment of the interpretive site by the Forest Service just a few decades ago. Additionally, we believe a more thorough analysis is needed to evaluate projected use, capacities, and impacts on current recreational uses of this area, including how running shuttle buses to this site from the Oconee Heritage Center will occur, projected commerce and tourism estimates, and how these activities will impact the Chattooga Wild and Scenic River corridor.

The Farmstead Proposal and Alternatives 2 and 3 violate varied tenets of the National Environmental Policy Act (NEPA), including:

-- NEPA procedures involving applications for private Special Use Permits.

Contrary to accepted Forest Service practice, the district apparently proposes to use this EA comment process and an expected Decision Notice as the final opportunity for the public to comment on issuance of an SUP for this Farmstead Proposal. In doing this, the district does not

allow a way to gauge the accuracy of the now-modified OHC farm building importation plans, or the financial capability of this private entity, and/or financial partners not yet identified, to raise or borrow the significant necessary funds to do so.

While the EA is based is on an OHC application for a special use permit, Georgia ForestWatch has determined that no such application currently exists in writing. While the OHC did file an application for importation of 12 new buildings in 2009, the more recent decision to apply for 4 additional buildings, cabins, and farmhouse was decided verbally in a private meeting of the OHC board of directors with the Andrew Pickens District Ranger (**Footnote No. 1**). Such private arrangements should not have a place in this important public process, particularly on a proposal with such long-term commitment and potential impacts on the Chattooga Wild and Scenic Corridor.

Additionally, the Andrew Pickens District avers that, assuming approval of any portion of this EA, the NEPA public involvement process would end and that an SUP would likely be issued without further public input (**Footnote No. 2**). This violates the clear NEPA requirement to solicit and secure public input for significant projects, of which this is a prime example. The district's proposal, in fact, would make it impossible to gauge the historical and era-specific significance of the buildings and cabins to be imported to the site, and, perhaps most significantly, make it impossible to gauge whether the OHC is in any shape financially to raise the necessary budget for this proposal or secure a performance bond for the project. Nor does it specify whether OHC is still to receive a "partial fee waiver" for its proposal, and what the waiver entails.

In fact, the administrative record for the Farmstead Proposal suggests that the U.S. Forest Service tried, and failed miserably, to develop the Russell House complex into a tourist attraction in the 1970s, dubbing it the Russell House Visitors Information Center.

"The center contained displays that depicted the history of the site from Cherokee Indian days through the Russell family period complete with all the outbuildings intact," that record notes (**Footnote No. 3**). But it is understood "the center was closed in 1972 due to low use by the visiting public and/or budgetary constraints. The Forest Service personnel who lived on the site to protect it from vandalism were pulled out. The house burned in 1988, probably due to arson. In 2000, [the] Forest Service acquired the Nicholson House (located about 2 miles north on Highway 28 in Georgia) and began giving consideration to using it as a visitors' center. In 2001 it also burned - probably due to arson" (**Footnote No. 4**).

The Andrew Pickens District also emphasized verbally that the aim behind the OHC's SUP proposal is to "stabilize," rather than restore several of the remnant Russell Farmstead outbuildings. The EA, however, proposes "restoration of the existing Russell Farmstead structures, some landscapes and historic Uses (EA, at p. 6)". Nothing in the EA explains what is meant by such stabilization, as opposed to restoration, further leaving the public in the dark on exactly what is intended in the OHC'S modified permit application.

Analysis of short and long-term impacts associated with the preferred alternatives, including possible intrusion onto the possibility of protected archeological Cherokee-era Indian and perhaps Archaic and Paleo-Indian gravesites.

Lands on both sides of the Route 28 bridge located less than 0.2 miles north of the farmstead are listed as previously being eligible for inclusion on the NHRP (listed as site 38Oc18). Nearby archeological site 9Ra127, located on the Georgia side of the river approximately 215 meters east of the current bridge is suggested as a possible “continuation of the 17th/18th Century Cherokee village on the other side of the river in South Carolina named Chattooga Town (38Oc18).” Although Site 9Ra17 “was never intensely investigated,” experts believe that 38Oc18 could contain burial sites. And while the most recent archeological evaluation of the site (performed by the Georgia Department of Transportation conducted in furtherance of the bridge replacement on Route 28) predicts “Native American burials are not expected to be encountered during monitoring,” that same survey posits all bridge work would be halted “in the event burials are inadvertently discovered,” pursuant to the Native American Graves Protection and Repatriation Act (NAGPRA). **See Footnote No. 5.**

Additionally, the Eastern Band of Cherokee Indians, in a formal response to the GDOT archeological survey, asked “that extreme caution and care be used during these [bridge replacement and construction project] studies as the probability for encountering human interments is extremely high [emphasis added]. “Due to the potential or locating burials,” the Eastern Band’s Tribal Historic Preservation Office letter continued that the tribe “supported non-invasive archeological testing of the site.” **See Footnote No. 6.**

Given the Farmstead’s site rich archeological history, Georgia ForestWatch is concerned that not enough consideration and proper analysis has been conducted to determine if Native American burial sites and other artifacts exist at the proposed site, and if so, what impact construction and post-construction activities will have on these sites.

-- Proper NEPA analysis of the connected Forest Service actions, and the related prohibition against “segmentation” of related agency projects.

Besides the aforementioned GDOT bridge replacement project, the U.S. Forest Service recently completed analysis and approval of a project to promote expanded growth of giant native cane (*Arundinaria gigantea*) on both sides of Route 28 on the Russell and Ridley fields. This cane is destined to be used, under permit, as a naturally occurring source of cane for qualified users, including the Eastern Band. The Russell Field also is used as the staging and landing area for a controversial helicopter trout stocking program conducted annually by Andrew Pickens Ranger District, conjointly with various area chapters of the Trout Unlimited angler lobby organization. The agency also is currently embroiled in an 8-year, controversial battle to approve and force some form of boating on the 21 miles of the Wild and Scenic Upper Chattooga – a proposal whose administrative appeal by six different organizations and individuals, including Georgia ForestWatch, is not expected to be resolved by an appeal deciding officer before July, 2012, at the earliest. Neither proposal is evaluated in detail in the SAF proposal EA, but clearly should have been in that NEPA requires evaluation of every long-term project and “connected actions” that reasonably can be expected to occur in and near a particular area. Not to do so violates the clear NEPA requirements against segmentation of related Forest Service projects.

Additionally, the SAF EA does not evaluate what increased visitor pressure brought on by a privatized, OHC farmstead would do to an already pressured parking situation in the general area. The small Forest Service parking areas on both sides of the Route 28 bridge are already

overflowing at peak hiking seasons on the national recreation Bartram Trail, which begins at the bridge, and the popular delayed trout harvest season area immediately upriver of the bridge. Some visitors are being forced to park along Route 28 rather than in the lots, a situation that will be exacerbated if and when boating is ever permitted on the Upper Chattooga and traditional visitors are barred from free access to the Russell Fields in the SAF proposal area (other than a handful of spaces that possibly will be allocated to their use (EA at p. 6). Anyone else would have to pay a fee to enter the new 30-space parking lot targeted for the SAF/OHC complex.

At the same time, the agency would not permit SAF proposal visitors to use the existing paddler/visitor/bird watcher parking lot located along Route 28 just downriver of the farmstead site, alleging a walking path could not be found to accommodate such use.

-- Proper analysis of reasonable alternatives to the SUP proposal from the OHC.

The U.S. Forest Service apparently did not hew to the NEPA requirement to give in-depth analysis to reasonable alternatives, and the rationale for such. Among them: The “no action alternative” fails to evaluate whether yet another European, settler-era farm reconstruction/museum is needed in Southern Appalachia. There is already a fairly substantial list of such farmsteads, including: the Foxfire Southern Appalachian Museum complex in Mountain City, Georgia, (in Rabun County, approximately 22 miles from the SAF proposal); the Southern Appalachian Pioneer Village on the Georgia Mountain Fairgrounds in Hiawassee, Georgia; the three “living history” Southern Appalachian Heritage Sites in the Great Smoky Mountain National Park; and the Mountain Farm Museum at the Oconaluftee Visitors Center outside Cherokee, North Carolina. While these other interpretive type sites exist, it does not appear that any of these sites are actually “working” 19th Century farms. If this is true, we believe the basic concept of having a working Appalachian farmstead would be of historic and cultural value to region; *however, we believe the Forest Service and Oconee Heritage affiliates should identify a different and more suitable location for such a farmstead outside of the Wild and Scenic River Corridor.*

Additionally, the Andrew Pickens District and its neighboring Chattooga River Ranger District on the Chattahoochee-Oconee National Forest, have studiously avoided analysis of what this entire area along Route 28 (from the Nicholson Tract to the Russell Farmstead and up to the Pine Mountain unincorporated area of Rabun County, Georgia) could provide in the way of National Historic Area (NHA), rather than a single site or building designation on the National Register of Historic Places. The area is compact – less than four miles long, and very rich in potential for *both* early European and Native American Indian interpretation. This includes the Old Chattooga Indiantown site (and probably previous American Indian occupation); the existing archeological sites on and near the Russell and Ridley Fields; the Nicholson Tract and former homesite and its many outbuildings; remnants of an early bridge over the West Fork and asbestos ore turbine milling site; the remnants of the Laurel Creek Corundum Mine and adjacent mine sites. Such a NHA could be interpreted at low cost to the agency – and accomplished without need for caretakers, caretaker homes and imported buildings that may not be accurate reconstructions of the original Russell structures/of equal historic significance, or any need to charge fees for private enterprise operating on public lands. Such a plan could include a series of walking trails along the Wild and Scenic Chattooga river and its West Fork, with little more than a series of historical interpretation markers and permanent display boards.

NEPA requires analysis of such reasonable alternatives.

-- The Russell Farmstead site, while still listed on the National Register of Historic Places, has since been deemed ineligible.

While the Russell Farmstead complex (38OC106), indeed, was placed on the NHRP following purchase of the property by the U.S. Forest Service in the 1970s, scientific and archeological re-evaluation of the property following arson of the main Russell House and several other significant structures on May 14, 1988 found it had become ineligible for such inclusion.

“The aim of the investigations was to determine whether this complex continues to be eligible to the NHRP, archeologically and/or architecturally, given the destruction of the main house,” according to the report prepared for the U.S Forest Service in 1991. **See Footnote No. 7.**

The SAF EA (at p. 1) notes that the arson and subsequent deterioration of other buildings “diminished the historic value and interpretive opportunities at the site.” Yet, the archeological investigation and re-evaluation contained the following opposite conclusion:

“Archeological evaluation of the standing structures determined that the existing structures are *not* [emphasis added] eligible to the NHRP on an individual basis or as a farmstead complex. The main house, which gave the complex its primary architectural significance, has been destroyed. Three outbuildings close to the main house, a smoke house, tool/carriage shed and modern outhouse, were also destroyed by fire. The oldest (ca. 1820) log barn is severely deteriorated and, with the exception of the small frame barn (ca. 1890-1900), the remaining structures date to the early to middle 20th Century. *None* of these structures [emphasis added] were determined to possess significant or unique characteristics that would support individual listing on the NHRP. As related farm buildings, they can be considered as representative or typical. This resource type appears to be well represented in the South Carolina inventory of historic structures. Better preserved examples of 19th- to 20th Century farmsteads exist in the region and the archeological deposits lack integrity. **For these reason, this site is considered ineligible to the NHRP on both archeological and architectural grounds.**” [Emphasis added]
See Footnote No. 8.

It thus appears that the premise of the SAF EA is based on an erroneous assumption – that the Russell Farmstead site is still eligible for NRHP designations. The proposals outlined under Alternatives 2 and 3 also project importing buildings that may or may not be historically significant or relevant to the original designation of the Russell House NRHP, perhaps furthering the sites ineligibility.

The Recreational Opportunity Spectrum (ROS) description of the Russell Farmstead site is erroneously described as “rural.”

The EA, (at p. 44) argues as follows: “The ROS class specifically for the five-acre Russell Farmstead is considered Rural; the 15-acre area surrounding the farmstead is considered Roaded Natural.” In fact, this assertion appears to be inaccurate. The ROS for the entire 20 acres under

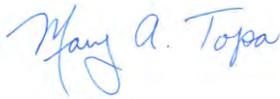
Management Prescription 2.A.3 for this segment of the Wild and Scenic River Chattooga Corridor “are in roaded natural setting, (Sumter LRMP, at pa. 3-17), where visitors are supposed to “enjoy at natural-appearing setting ...”

The proposed development appears incompatible with the LRMP description of the 2.A.3 designation criteria, particularly the language discouraging the creation of new permanent openings. It thus appears that the district has attempted to stretch the actual ROS for this area to accommodate the proposed farmstead and increased development on this part of the Wild and Scenic River.

For this and the numerous other reasons, Georgia ForestWatch concludes that the Andrew Pickens Ranger District has erred in its analysis of the SAF proposal and should abandon it at the current location, rather than attempt further analysis and pursuit of a flawed project. We also call on the district to abandon its proposed Amendment No. 2 to the Sumter National Forest LRMP, as it would no longer be necessary.

Kindly keep us abreast of any further developments regarding this issue, and let us know if there are any questions. We’d be glad to meet if it would prove useful.

Very sincerely yours,



Mary A. Topa, Ph.D.
Executive Director, Georgia ForestWatch
15 Tower Road
Ellijay, Ga. 30540

Referenced Footnotes:

Footnote No. 1. Telephone interview between Georgia ForestWatch Co-District Volunteer Leader Joseph Gatins and Andrew Pickens Ranger District Ranger Mike Crane, May 30, 2012

Footnote No. 2. (*Ibid.*)

Footnote No. 3. Russell Farmstead NEPA scoping comment response from long-time Chattooga corridor visitor and angler, Doug Adams, dated August 14, 2009.

Footnote No. 4. (*Ibid.*)

Footnote No. 5. See *Final Report of the Archeological Phase I Survey and Phase II Testing of the Proposed Bridge Replacement on State Route 28 over the Chattooga River in Rabun County, Georgia, and Oconee County, South Carolina, HP-010406-007, and Georgia Department of Transportation Project BR-0000-00 (306), P.I. No. 0000306*, by James E. Pomfret, Principal Investigator, GDOT, September, 2006 and handwritten note in the GDOT archeological review file relating to a March 1, 2002, interview and meeting with Dr. Gerald F. Schroedl of the University of Tennessee, one of the many scientific experts who studied this general archeological site. Schroedl reported that “no burials” (other than several dog remain burials) were discovered during the 1980s studies of the site, but that “2-5 were suspected to each dwelling.”

Footnote No. 6. See November 12, 2002, letter to GDOT’s James Pomfret from Lee Clauss, Historical Preservation Specialist with the Tribal Historical Preservation Office, The Eastern Band of Cherokee Indians, contained in the GDOT project file for the bridge replacement, currently on hold for financial reasons.

Footnote No. 7. *Reevaluation of the Russell Farmstead, Andrew Pickens District, Sumter National Forest. Oconee County, South Carolina, Francis Marion and Sumter National Forests Cultural Resource Management Report 91-18*, by Lisa D. O’Steen and William R. Chapman, 6 September, 1991, Southern Archeological Services Inc, P.O. Drawer 8086, Athens, Georgia 30603.

Footnote No. 8. (*Ibid, O’Steen & Chapman report, ABSTRACT, page ii.*)

From: Charles Wier <cwier60@yahoo.com>
Sent: Friday, June 08, 2012 11:06 AM
To: Crane, Mike -FS; FS-comments-southern-francismarion-sumter-andrewpickens
Subject: Southern Appalachian Farmstead Environmental Assessment

Michael B. Crane
District Ranger
Andrew Pickens Ranger District Office
112 Andrew Pickens Circle
Mountain Rest, SC 29664

I am opposed to any development on any US Forest Service land that affects the Chattooga Wild and Scenic River, its tributaries, or its flood plain, inside or outside the Wild and Scenic River Corridor. It is shocking to me that the Forest Service, which is charged with protecting this Wild and Scenic River, is proposing to develop a theme park on 20 acres within the protected corridor. The Wild & Scenic Rivers Act (WSRA) calls for non-degradation and enhancement of the resource. This proposed "farmstead" is merely a theme park whose negative impacts directly conflict with river protection standards and guidelines, as well as public expectations for upholding the WSRA mandates. Monies that would be spent on getting this project approved and constructed could go a long way toward forwarding the true goals of the Wild and Scenic Rivers Act and / or reducing the Federal Budget.

After spending years performing EAs and evaluating the impact of a small number of boaters on the headwaters of the Chatooga, you are now proposing a large-scale development that is detrimental to ALL users of this beautiful Wild and Scenic river. There is no way that ANY development or the use of fertilizer, pesticides, and insecticides that will surely accompany such a development should legally occur within the W&S corridor.

Since virtually all of the buildings and facilities will be brought in from elsewhere, there is no justifiable reason to create this development in the original location along the river banks. If the FS absolutely must build this heritage center, which I oppose altogether, then it should be built on land that is beyond the protected W&S corridor. It is irresponsible and possibly illegal to do otherwise. It is sad to see that the intentions of the Sumter Forest Service are NOT to protect the beautiful resource that we have in the Chatooga W&S River corridor. This river needs to be protected for the enjoyment of current and more importantly future generations.

Respectfully in opposition,

Charles Wier
3423 Wolffork Rd
Rabun Gap, GA 30568

From: McEwen, April <amcewen@water.ca.gov>
Sent: Friday, June 15, 2012 11:56 PM
To: FS-comments-southern-francismarion-sumter
Cc: McEwen, April
Subject: Southern Appalachian Farmstead Environmental Assessment Comments
Attachments: Draft Final Comments.docx

District Ranger
Andrew Pickens Ranger District Office
112 Andrew Pickens Circle
Mountain Rest, SC 29664

June 15, 2012

To Whom it May Concern:

These comments are written in regard to the establishment of a Southern Appalachian Farmstead in the Chattooga Wild & Scenic Corridor. I have also attached my comments in a Microsoft Word document for your convenience. In my review of the related Environmental Assessment (EA), I did not find a substantive objective analysis or assessment of the impacts the proposed project would cause on the Chattooga River ecosystem (including land, water, and wildlife) or visitors to that ecosystem. I further question the legality of the proposed action and action alternatives in terms of the Wild and Scenic Rivers Act (WSR), Forest Plan, the NEPA process, and Native American history at the project site. In summary, I propose an additional alternative to help provide you with a range of alternatives. However, I support the no-action alternative in favor of complete protection (non-degradation) of the Chattooga River ecosystem and the ORV's we seek to protect for future generations.

All human actions and especially development has an impact on the natural and human environment. Development of parking lots and increasing the amount of impervious surface in the watershed has cumulative impacts on drainage patterns, runoff, and water quality. Water use (i.e., the diversion or removal of water from the groundwater or surface water supply) has an effect on the receiving water bodies flow (in this case the free-flowing Chattooga River that needs all of its natural flow to sustain downstream aquatic life and recreational uses). Agricultural land use in a river's floodplain affects sediment and nutrient transport, drainage patterns and flow regimes, water quality, and wildlife. Removal of riparian habitat displaces the species that currently inhabit that area, some of them listed as threatened, endangered, or a species of concern by the Endangered Species Act. Removal of riparian habitat also may limit the capability of existing vegetation to filter out sediments, nutrients, pesticides, and fertilizers, as well as increase adjacent and downstream water temperatures.

The Forest Service should not issue a permit for actions that would impose more stressors and sources of impact on a river that supposedly has the highest federal protection available. Subjective statements of non-significance are irrelevant in the NEPA process. New definitions for this special place should not be created because definitions of "historic" and "enhancement" or "restoration" are flawed. Ubiquitous reference to unsupported statements of non-significance are misleading throughout the EA and lead the reader on a wild goose chase to find any substantive evidence at all. At face value, this entire project has a conflict of goals, values, and Wild and Scenic River (WSR) protection written all over it. Upon deeper investigation, this project stinks of alternative motives including commercial

interests and action taken to make future development and use within the WSR even easier for whoever would wish to exploit it.

Riparian Buffer Reduction (EA, p. 20)

Maintaining a natural riparian ecosystem has been identified as one of the most important management practices in preserving water quality and protecting wildlife (Naiman and Decamps 1997). While the ecological importance of maintaining a riparian buffer is virtually undisputed, riparian buffer width has been a source of contention between scientists, managers, and land users alike. The only surprising part is that something so contentious would end up in an Environmental Assessment written by the USFS who proposes to reduce riparian buffer width on the federally protected Wild and Scenic Chattooga River to the most minimum width of almost any best management practice recommendation in any state and on any type of land. It is even more surprising that to reduce riparian buffer width at the Russell Farmstead proposed development site, the USFS would propose to change the Sumter National Forest Land and Resource Management Plan. Proposed buffer width reduction and Forest Plan changes to accommodate this buffer reduction are significant and should not be a part of any action alternative for the following reasons:

1. There is no proposed mitigation for the acreage of riparian vegetation that would be removed. One might think a whole EA would be prepared just for the removal of so much riparian vegetation bordering a WSR.
2. The EA proposes changes to existing management plans to allow the proposed action to be completed. Leading National Environmental Policy Act (NEPA) compliance experts specifically recommend that the permitting agency not change an existing management plan to allow a proposed action to be completed (Bass, Herson, Bogdan 2001).
3. The SC Scenic Rivers Program offers scenic rivers considered to be “natural” more protection than both proposed actions (the development/riparian buffer reduction and Forest Plan change) wish to offer a federally protected WSR. They also comment that greater benefits for wildlife are a function of a greater buffer width. The SC Scenic Rivers Program recommends a minimum buffer width of 40 – 80 ft (dependent on slope) for protection of water quality, 100 ft to protect aesthetic/scenic values, and 100 – 300 ft for the protection of wildlife values.
4. The proposed action and changes to the Forest Plan to accommodate it are precedent setting. They set a precedent where the Forest will bend its Plan to justify commercial use and development within the river corridor. It sets a precedent where not only the ¼ mi WSR riparian buffer does not apply, but even a 100 ft buffer would be reduced.
5. There has been no pre-project monitoring and there is no proposed post-project monitoring that would assess the degradation caused to water quality, aquatic resources, and wildlife habitat and movement as a result of riparian buffer removal. An adequate migration corridor along the project side of the Chattooga River should be maintained so wildlife (e.g., deer, black bear) would not have to go around the Farmstead via the road where road related mortality and injury is common.

Legality of the Proposed Action and Russell Farmstead EA

The values that caused the Chattooga River to be included in the WSR system are the unique aesthetic, ecological, and cultural (Cherokee villages) features of the watershed not the then current use of the watershed, which consisted of logging, farming, commerce, etc. In fact, people removed from the WSR corridor were practicing the same actions this project proposes. For example, at Earl’s Ford, there is also a historical site, which used to be an overnight stopping point for travelers. Venturing off horse trails along Section II will bring you to old cemeteries, still composed with headstones and markers that are virtually unknown to the Forest Service and whose whereabouts are only known to still living ex-

inhabitants of the WSR corridor. These historical sites should not be “enhanced”, maintained, or re-developed and neither should the Russell Farmstead, which is also located in an ecologically sensitive riparian area and floodplain of the Chattooga River. In addition, destruction and alteration of land to construct a 30-car parking lot on the five “historic acres” is not consistent with the Secretary of Interior’s Standards for the Treatment of Historic Properties.

ORV’s

The following is a quote from the EA:

“Guidelines suggest ORVs should be river related or river dependent (e.g., located in the river or on its immediate shorelands [generally within one-quarter mile on either side of the river], contribute substantially to the functioning of the river ecosystem and owe its location or existence to the presence of the river). The IWSRCC also suggests that ORVs must be rare, unique or exemplary at a comparative regional or national scale. As expressed by the IWSRCC in 1999, this means that “such a value would be one that is a conspicuous example from among a number of similar values that are themselves uncommon or extraordinary” (IWSRCC, 1999).”

However, there is nothing about a farmstead that is necessarily river related or river dependent, although water is a necessary component of a working farm. The proposed action does not contribute at all, no less substantially, to the functioning of the river ecosystem. On the contrary, it is only possible that the proposed action decrease the function and quality of the ecosystem especially considering riparian buffer removal and the reduction of its sediment and nutrient filtering functions. Furthermore, there is nothing “rare, unique, or exemplary” or “uncommon or extraordinary” about farm animals. They are literally all over the United States and so widespread that agriculture is the primary source of pollution to the waterways of the United States.

In addition, there is no monitoring plan for degradation of ORV’s, no plan for implementing monitoring, and no identification of what would even be monitored. The only monitoring proposed does not assess whether ORV’s are being protected and/or enhanced. It is construction monitoring, which a construction inspector is only required to do during the construction period. After construction, there is no plan to determine if degradation of ORV’s are occurring. Even design criteria proposed to reduce degradation are vague (EA Section 2.4).

NEPA and Project Actions Outside the “Historical Places” Scope

An EA is a document that should determine whether the proposed action has the potential to cause significant environmental effects (40 CFR 1508.9). The Russell Farmstead EA rejects current EA preparation convention by ignoring guidelines and preparation suggestions offered in NEPA compliance books such as “The NEPA Book” (Bass, Herson, Bogdan 2001). One of the main purposes of an EA is to “provide evidence and analysis sufficient to determine whether an EIS is required” (40CFR 1508.9(a)). Specifically, when an EA is potentially used to justify a Finding of No Significant Impacts (FONSI), supporting data and references should convince and demonstrate to the reader that the proposed action will not significantly affect the human environment. In contrast, the Russell Farmstead EA contains a lot of thoughts, a lot of assumptions, an incredible amount of subjectivity that go above and beyond the realms of reasonable logic and far below NEPA document preparation and credible research standards. Sufficient evidence is not provided to determine whether an EIS is required. Instead the authors appear to want to fast-track the project with a FONSI. Subjective statements abound such as “no sub-surface alterations shall occur to water quality”. A simple literature review would show a documental plethora of evidence that supports the fact that hydrological sub-surface alterations always occur when you withdraw water from a system, harden surfaces, add pesticides/fertilizers/stormwater runoff, and remove riparian vegetation. In addition, there are no adaptive management strategies that allow for flexibility when dealing with the uncertainties of the future (e.g., climate change) and complex ecological systems such as the Chattooga River watershed.

Criticisms of the Russell Farmstead EA and proposed action are listed below:

- The EA goes far outside its legal scope by proposing changes to existing management plans to allow the proposed action to be completed. All alternatives except the “no action” alternative require a Forest Plan change, even though “federal agencies are required to consider the degree to which a proposed action may establish a precedent for future actions, if those future actions would result in significant environmental effects” (Bass et al. 2001, p. 51). The FS did not consider the precedent they are setting if indeed a large farmstead were to be developed at a historical site on the banks of the Wild and Scenic Chattooga River. There are multiple historical sites in the watershed and this project in particular sets a precedent that could be followed in the future by other “history” developers.
- To state that impacts to water quality will be negligible lack any objective basis when the number and frequency of users, localized site hydrology including sub-surface, and future weather patterns and Chattooga River flow events are unknown. For example, the area of the Farmstead proposed to be used to pasture, tether, and corral domestic farm animals is located within the Chattooga River’s floodplain. Global warming is predicted by scientists to increase dramatic flood events and drought. Agricultural impacts including pesticides/fertilizers and animal waste introductions are known to have large direct, indirect, and cumulative impacts on waterways in every single state of the US. When in the future the Chattooga River overflows its banks into its natural floodplain that is also the project area, there is no evidence that shows animal waste and other contaminants will not have a direct, indirect, or cumulative significant impact on aquatic resources.
- The FS should not use the EA to justify decisions that were made prior to the analysis. For example, decisions to amend the management plan or plans to do so should not be made prior to the assessment’s completion. In addition, “you should not consider alternatives that could be implemented only after significant changes in governmental policy or legislation” (Bass et al. 2001). This EA does just that by offering to change the management plan so the proposed action could occur. Astoundingly enough, the proposed management plan context involves reducing riparian buffers and relaxing other environmentally protective regulations on the entire forest, which could have a significant effect on future projects and their environmental impact.
- The EA should have used footnotes to the scientific documents and other sources of information related to its conclusions (40CFR1502.24). It is also too long. An EA should be a concise document (FSH 1909.15, Bass et al. 2001, CEQ 40 Questions Number 36). Instead this EA leads the reader on a wild goose chase for any evidence to actually support any allegations of negligible environmental effects.
- The alternatives offered are not adequate because there really is only the alternative of the proposed action in its entirety or no action. *State of California v. Block*, 690 F.2d 753 (9th Cir.1992) found the range of alternatives were inadequate because it constrained the possible choice of options available to decision makers.
- The EA states cumulative effects are discussed in the context of the entire Chattooga WSR. There is an issue with the scale used to determine cumulative effects. There was no discussion of cumulative effects at the project site and downstream of the project site.

Q&A Session

- Q: The project area adjacent to the river is located in the Chattooga River’s floodplain. At what water level does the river overflow its banks into the project area?
A: We don’t know. There has been no hydrological analysis of the utility of this floodplain to retain or abate flood events, although this information is important because receding flood waters could carry sediment, animal waste, and micronutrients back into the river...especially in light of the proposed riparian buffer removal.
- Q: Have all endangered species in the area been identified and has the area been surveyed for their existence?
A: No, the Sumter National Forest (where the proposed project would be located) has never done surveys to assess the occurrence of locally rare or protected species at the project location. The EA (p.81) says a list of locally rare species is kept by the Chattahoochee National Forest. The last time this “list” was updated is unknown and in all likelihood has not been recent. In summary, an endangered or threatened species could live in the 60 ft of riparian habitat that is going to be removed or they could live adjacent to the project area and be subject to noise disturbance among other impacts.
- Q: Would the crowds and land disturbance affect endangered species habitat?

A: This is unknown as no studies and pre-project monitoring has been conducted to make a determination.

- Q: What would be the allowed use for the project area? What is the estimated use given a newly constructed 30-car parking lot and existing 5-car parking lot in terms of people at one time (PAOT) and in terms of daily use, seasonal use, and during holiday periods? What is the ecological and social carrying capacity once interpretation and use begin to happen? What amount of water would be diverted from local aquifers (e.g., water that would enter the river if project users were not drinking it and/or using it) to sustain the drinking and sanitation (flushing, hand washing) needs of users, drinking needs of farm animals, garden irrigation needs, and year-round caretaker residence water supply?

A: None of these questions regarding analysis of use and the indirect, direct, and cumulative impacts of that use on the local environment are answered in the EA. The EA says there is a "Use Estimation". However, there are no quantitative numbers and actual estimation. Only vague qualitative descriptors of increased use and its impacts are included and unsupported opinions of non-significance. There could be impacts to the water table, especially in periods of drought. The amount of water diverted from entering the Chattooga River by use at the Russell Farmstead would essentially be water that would have entered the Chattooga.

Summary and Preferred Alternative

We cannot recreate true history unless we allow areas that were historically impacted by our development to return to a natural state, otherwise known as the historical baseline. Long before the Russell Farmstead was built, Native Americans had history in the same location. The Chattooga River watershed's history is not defined by the logging and farming created by Europeans. It is instead defined by its unique and complex ecological, geological, and aesthetic beauty, a place we wish to preserve in its natural state for future generations. We can and should improve our future by making responsible decisions that reflect our desire to have a watershed that does not continue a global trend of increased development and correlated impacts to our waterways.

I propose the Forest Service choose the no-action alternative as the significance of the changes to the Chattooga are much greater than simply allowing this area to return to its natural historical state. At the very least, alternatives should be provided that are significantly different (as opposed to Alternatives 2 and 3, which are almost identical). One such alternative could be developing only a few of the buildings closest to the road, not building a year-round residence, not building a 30-car capacity parking lot, not pursuing non-historical parts of the proposal such as agriculture/livestock, and not reducing any existing vegetation. Only after such an alternative is added would there then be a range of alternatives that reasonably achieve the "need" that the proposed action is supposed to be addressing. However, even once a valid EA has been developed with a true range of alternatives, this project is highly controversial and impacts to the environment will not have been truly assessed without research and an environmental impact statement.

References

Bass, R., Herson, A., Bogdan, K. 2001. The NEPA book: A step-by-step guide on how to comply with the National Environmental Policy Act, 2nd Ed. Solano Press Books, CA.

Naiman, R., Decamps, H. 1997. The ecology of interfaces: Riparian zones. Annual Review of Ecology Systems, 28, 621-58.

Sincerely,

April McEwen
2222 S St., Apt D
Sacramento, CA 95816

District Ranger
Andrew Pickens Ranger District Office
112 Andrew Pickens Circle
Mountain Rest, SC 29664

June 15, 2012

To Whom it May Concern:

These comments are written in regard to the establishment of a Southern Appalachian Farmstead in the Chattooga Wild & Scenic Corridor. In my review of the related Environmental Assessment (EA), I did not find a substantive objective analysis or assessment of the impacts the proposed project would cause on the Chattooga River ecosystem (including land, water, and wildlife) or visitors to that ecosystem. I further question the legality of the proposed action and action alternatives in terms of the Wild and Scenic Rivers Act (WSR), Forest Plan, the NEPA process, and Native American history at the project site. In summary, I propose an additional alternative to help provide you with a range of alternatives. However, I support the no-action alternative in favor of complete protection (non-degradation) of the Chattooga River ecosystem and the ORV's we seek to protect for future generations.

All human actions and especially development has an impact on the natural and human environment. Development of parking lots and increasing the amount of impervious surface in the watershed has cumulative impacts on drainage patterns, runoff, and water quality. Water use (i.e., the diversion or removal of water from the groundwater or surface water supply) has an effect on the receiving water bodies flow (in this case the free-flowing Chattooga River that needs all of its natural flow to sustain downstream aquatic life and recreational uses). Agricultural land use in a river's floodplain affects sediment and nutrient transport, drainage patterns and flow regimes, water quality, and wildlife. Removal of riparian habitat displaces the species that currently inhabit that area, some of them listed as threatened, endangered, or a species of concern by the Endangered Species Act. Removal of riparian habitat also may limit the capability of existing vegetation to filter out sediments, nutrients, pesticides, and fertilizers, as well as increase adjacent and downstream water temperatures.

The Forest Service should not issue a permit for actions that would impose more stressors and sources of impact on a river that supposedly has the highest federal protection available. Subjective statements of non-significance are irrelevant in the NEPA process. New definitions for this special place should not be created because definitions of "historic" and "enhancement" or "restoration" are flawed. Ubiquitous reference to unsupported statements of non-significance are misleading throughout the EA and lead the reader on a wild goose chase to find any substantive evidence at all. At face value, this entire project has a conflict of goals, values, and Wild and Scenic River (WSR) protection written all over it. Upon deeper investigation, this project stinks of alternative motives including commercial interests and action taken to make future development and use within the WSR even easier for whoever would wish to exploit it.

Riparian Buffer Reduction (EA, p. 20)

Maintaining a natural riparian ecosystem has been identified as one of the most important management practices in preserving water quality and protecting wildlife (Naiman and Decamps 1997). While the

ecological importance of maintaining a riparian buffer is virtually undisputed, riparian buffer width has been a source of contention between scientists, managers, and land users alike. The only surprising part is that something so contentious would end up in an Environmental Assessment written by the USFS who proposes to reduce riparian buffer width on the federally protected Wild and Scenic Chattooga River to the most minimum width of almost any best management practice recommendation in any state and on any type of land. It is even more surprising that to reduce riparian buffer width at the Russell Farmstead proposed development site, the USFS would propose to change the Sumter National Forest Land and Resource Management Plan. Proposed buffer width reduction and Forest Plan changes to accommodate this buffer reduction are significant and should not be a part of any action alternative for the following reasons:

1. There is no proposed mitigation for the acreage of riparian vegetation that would be removed. One might think a whole EA would be prepared just for the removal of so much riparian vegetation bordering a WSR.
2. The EA proposes changes to existing management plans to allow the proposed action to be completed. Leading National Environmental Policy Act (NEPA) compliance experts specifically recommend that the permitting agency not change an existing management plan to allow a proposed action to be completed (Bass, Herson, Bogdan 2001).
3. The SC Scenic Rivers Program offers scenic rivers considered to be “natural” more protection than both proposed actions (the development/riparian buffer reduction and Forest Plan change) wish to offer a federally protected WSR. They also comment that greater benefits for wildlife are a function of a greater buffer width. The SC Scenic Rivers Program recommends a minimum buffer width of 40 – 80 ft (dependent on slope) for protection of water quality, 100 ft to protect aesthetic/scenic values, and 100 – 300 ft for the protection of wildlife values.
4. The proposed action and changes to the Forest Plan to accommodate it are precedent setting. They set a precedent where the Forest will bend its Plan to justify commercial use and development within the river corridor. It sets a precedent where not only the ¼ mi WSR riparian buffer does not apply, but even a 100 ft buffer would be reduced.
5. There has been no pre-project monitoring and there is no proposed post-project monitoring that would assess the degradation caused to water quality, aquatic resources, and wildlife habitat and movement as a result of riparian buffer removal. An adequate migration corridor along the project side of the Chattooga River should be maintained so wildlife (e.g., deer, black bear) would not have to go around the Farmstead via the road where road related mortality and injury is common.

Legality of the Proposed Action and Russell Farmstead EA

The values that caused the Chattooga River to be included in the WSR system are the unique aesthetic, ecological, and cultural (Cherokee villages) features of the watershed not the then current use of the watershed, which consisted of logging, farming, commerce, etc. In fact, people removed from the WSR corridor were practicing the same actions this project proposes. For example, at Earl’s Ford, there is also a historical site, which used to be an overnight stopping point for travelers. Venturing off horse trails along Section II will bring you to old cemeteries, still composed with headstones and markers that are virtually unknown to the Forest Service and whose whereabouts are only known to still living ex-

inhabitants of the WSR corridor. These historical sites should not be “enhanced”, maintained, or re-developed and neither should the Russell Farmstead, which is also located in an ecologically sensitive riparian area and floodplain of the Chattooga River. In addition, destruction and alteration of land to construct a 30-car parking lot on the five “historic acres” is not consistent with the Secretary of Interior’s Standards for the Treatment of Historic Properties.

ORV’s

The following is a quote from the EA:

“Guidelines suggest ORVs should be river related or river dependent (e.g., located in the river or on its immediate shorelands [generally within one-quarter mile on either side of the river], contribute substantially to the functioning of the river ecosystem and owe its location or existence to the presence of the river). The IWSRCC also suggests that ORVs must be rare, unique or exemplary at a comparative regional or national scale. As expressed by the IWSRCC in 1999, this means that “such a value would be one that is a conspicuous example from among a number of similar values that are themselves uncommon or extraordinary” (IWSRCC, 1999).”

However, there is nothing about a farmstead that is necessarily river related or river dependent, although water is a necessary component of a working farm. The proposed action does not contribute at all, no less substantially, to the functioning of the river ecosystem. On the contrary, it is only possible that the proposed action decrease the function and quality of the ecosystem especially considering riparian buffer removal and the reduction of its sediment and nutrient filtering functions. Furthermore, there is nothing “rare, unique, or exemplary” or “uncommon or extraordinary” about farm animals. They are literally all over the United States and so widespread that agriculture is the primary source of pollution to the waterways of the United States.

In addition, there is no monitoring plan for degradation of ORV’s, no plan for implementing monitoring, and no identification of what would even be monitored. The only monitoring proposed does not assess whether ORV’s are being protected and/or enhanced. It is construction monitoring, which a construction inspector is only required to do during the construction period. After construction, there is no plan to determine if degradation of ORV’s are occurring. Even design criteria proposed to reduce degradation are vague (EA Section 2.4).

NEPA and Project Actions Outside the “Historical Places” Scope

An EA is a document that should determine whether the proposed action has the potential to cause significant environmental effects (40 CFR 1508.9). The Russell Farmstead EA rejects current EA preparation convention by ignoring guidelines and preparation suggestions offered in NEPA compliance books such as “The NEPA Book” (Bass, Herson, Bogdan 2001). One of the main purposes of an EA is to “provide evidence and analysis sufficient to determine whether an EIS is required” (40CFR 1508.9(a)). Specifically, when an EA is potentially used to justify a Finding of No Significant Impacts (FONSI), supporting data and references should convince and demonstrate to the reader that the proposed action will not significantly affect the human environment. In contrast, the Russell Farmstead EA contains a lot of thoughts, a lot of assumptions, an incredible amount of subjectivity that go above and beyond the realms of reasonable logic and far below NEPA document preparation and credible research

standards. Sufficient evidence is not provided to determine whether an EIS is required. Instead the authors appear to want to fast-track the project with a FONSI. Subjective statements abound such as “no sub-surface alterations shall occur to water quality”. A simple literature review would show a documental plethora of evidence that supports the fact that hydrological sub-surface alterations always occur when you withdraw water from a system, harden surfaces, add pesticides/fertilizers/stormwater runoff, and remove riparian vegetation. In addition, there are no adaptive management strategies that allow for flexibility when dealing with the uncertainties of the future (e.g., climate change) and complex ecological systems such as the Chattooga River watershed.

Criticisms of the Russell Farmstead EA and proposed action are listed below:

- The EA goes far outside its legal scope by proposing changes to existing management plans to allow the proposed action to be completed. All alternatives except the “no action” alternative require a Forest Plan change, even though “federal agencies are required to consider the degree to which a proposed action may establish a precedent for future actions, if those future actions would result in significant environmental effects” (Bass et al. 2001, p. 51). The FS did not consider the precedent they are setting if indeed a large farmstead were to be developed at a historical site on the banks of the Wild and Scenic Chattooga River. There are multiple historical sites in the watershed and this project in particular sets a precedent that could be followed in the future by other “history” developers.
- To state that impacts to water quality will be negligible lack any objective basis when the number and frequency of users, localized site hydrology including sub-surface, and future weather patterns and Chattooga River flow events are unknown. For example, the area of the Farmstead proposed to be used to pasture, tether, and corral domestic farm animals is located within the Chattooga River’s floodplain. Global warming is predicted by scientists to increase dramatic flood events and drought. Agricultural impacts including pesticides/fertilizers and animal waste introductions are known to have large direct, indirect, and cumulative impacts on waterways in every single state of the US. When in the future the Chattooga River overflows its banks into its natural floodplain that is also the project area, there is no evidence that shows animal waste and other contaminants will not have a direct, indirect, or cumulative significant impact on aquatic resources.
- The FS should not use the EA to justify decisions that were made prior to the analysis. For example, decisions to amend the management plan or plans to do so should not be made prior to the assessment’s completion. In addition, “you should not consider alternatives that could be implemented only after significant changes in governmental policy or legislation” (Bass et al. 2001). This EA does just that by offering to change the management plan so the proposed action could occur. Astoundingly enough, the proposed management plan context involves reducing riparian buffers and relaxing other environmentally protective regulations on the entire forest, which could have a significant effect on future projects and their environmental impact.
- The EA should have used footnotes to the scientific documents and other sources of information related to its conclusions (40CFR1502.24). It is also too long. An EA should be a concise document (FSH 1909.15, Bass et al. 2001, CEQ 40 Questions Number 36). Instead this EA leads the reader on a wild goose chase for any evidence to actually support any allegations of negligible environmental effects.
- The alternatives offered are not adequate because there really is only the alternative of the proposed action in its entirety or no action. *State of California v. Block*, 690 F.2d 753 (9th Cir.1992) found the range of alternatives were inadequate because it constrained the possible

choice of options available to decision makers.

- The EA states cumulative effects are discussed in the context of the entire Chattooga WSR. There is an issue with the scale used to determine cumulative effects. There was no discussion of cumulative effects at the project site and downstream of the project site.

Q&A Session

- Q: The project area adjacent to the river is located in the Chattooga River's floodplain. At what water level does the river overflow its banks into the project area?

A: We don't know. There has been no hydrological analysis of the utility of this floodplain to retain or abate flood events, although this information is important because receding flood waters could carry sediment, animal waste, and micronutrients back into the river...especially in light of the proposed riparian buffer removal.

- Q: Have all endangered species in the area been identified and has the area been surveyed for their existence?

A: No, the Sumter National Forest (where the proposed project would be located) has never done surveys to assess the occurrence of locally rare or protected species at the project location. The EA (p.81) says a list of locally rare species is kept by the Chattahoochee National Forest. The last time this "list" was updated is unknown and in all likelihood has not been recent. In summary, an endangered or threatened species could live in the 60 ft of riparian habitat that is going to be removed or they could live adjacent to the project area and be subject to noise disturbance among other impacts.

- Q: Would the crowds and land disturbance affect endangered species habitat?

A: This is unknown as no studies and pre-project monitoring has been conducted to make a determination.

- Q: What would be the allowed use for the project area? What is the estimated use given a newly constructed 30-car parking lot and existing 5-car parking lot in terms of people at one time (PAOT) and in terms of daily use, seasonal use, and during holiday periods? What is the ecological and social carrying capacity once interpretation and use begin to happen? What amount of water would be diverted from local aquifers (e.g., water that would enter the river if project users were not drinking it and/or using it) to sustain the drinking and sanitation (flushing, hand washing) needs of users, drinking needs of farm animals, garden irrigation needs, and year-round caretaker residence water supply?

A: None of these questions regarding analysis of use and the indirect, direct, and cumulative impacts of that use on the local environment are answered in the EA. The EA says there is a "Use Estimation". However, there are no quantitative numbers and actual estimation. Only vague qualitative descriptors of increased use and its impacts are included and unsupported opinions of non-significance. There could be impacts to the water table, especially in periods of drought. The amount of water diverted from entering the Chattooga River by use at the Russell Farmstead would essentially be water that would have entered the Chattooga.

Summary and Preferred Alternative

We cannot recreate true history unless we allow areas that were historically impacted by our development to return to a natural state, otherwise known as the historical baseline. Long before the Russell Farmstead was built, Native Americans had history in the same location. The Chattooga River watershed's history is not defined by the logging and farming created by Europeans. It is instead defined by its unique and complex ecological, geological, and aesthetic beauty, a place we wish to preserve in its natural state for future generations. We can and should improve our future by making responsible decisions that reflect our desire to have a watershed that does not continue a global trend of increased development and correlated impacts to our waterways.

I propose the Forest Service choose the no-action alternative as the significance of the changes to the Chattooga are much greater than simply allowing this area to return to its natural historical state. At the very least, alternatives should be provided that are significantly different (as opposed to Alternatives 2 and 3, which are almost identical). One such alternative could be developing only a few of the buildings closest to the road, not building a year-round residence, not building a 30-car capacity parking lot, not pursuing non-historical parts of the proposal such as agriculture/livestock, and not reducing any existing vegetation. Only after such an alternative is added would there then be a range of alternatives that reasonably achieve the "need" that the proposed action is supposed to be addressing. However, even once a valid EA has been developed with a true range of alternatives, this project is highly controversial and impacts to the environment will not have been truly assessed without research and an environmental impact statement.

References

Bass, R., Herson, A., Bogdan, K. 2001. The NEPA book: A step-by-step guide on how to comply with the National Environmental Policy Act, 2nd Ed. Solano Press Books, CA.

Naiman, R., Decamps, H. 1997. The ecology of interfaces: Riparian zones. Annual Review of Ecology Systems, 28, 621-58.

Sincerely,

April McEwen
2222 S St., Apt D
Sacramento, CA 95816

From: Roger Huff <rogerhuff@bellsouth.net>
Sent: Friday, June 01, 2012 7:47 PM
To: FS-comments-southern-francismarion-sumter
Subject: Southern Appalachian Farmstead Environmental Assessment

To Whom it May Concern:

My impression of the Environmental Assessment is that it is someone's clever way of trying to get the public to pay and support their dream of a lifestyle to live on protected lands in the Chattooga Wild and Scenic River Corridor area.

I reject this entire idea and support Alternative 1 (status quo).

An analysis of the budget proposal shows a recurring cost to the Forestry Service of \$92K annually while the Oconee Heritage Center (OHC) will be allowed to operate a gift shop and charge access fees to cover their costs and possibly make a living; not a fair use of public lands in my opinion.

The Forestry Service is already facing budgetary challenges, and I find it hard to swallow that the FS is willing to take on a recurring deficit from this project.

While having historical characteristics the idea of a farmstead does not align with a Wild and Scenic River.

/s/

Roger Huff
620 Steel Bridge Road

Canton, GA 30114

(678)314-1514

From: Malcolm Leaphart <mwleapjr@att.net>
Sent: Friday, June 08, 2012 1:22 PM
To: FS-comments-southern-francismarion-sumter
Cc: Crane, Mike -FS; Riley, Jeanne -FS; RankinD@dnr.sc.gov; Ross Self
Subject: Southern Appalachian Farmstead Project #29475

The Chattooga River in the reach bordered by the Farmstead is 'trout water' as noted in the Environmental Assessment (EA) for this project. Research has shown that a minimum of 100 ft of vegetated buffer is needed to eliminate impacts on trout populations. The proposed 40 ft buffer for this project on the Chattooga is therefore inadequate.

A buffer of less than 100 ft. might be appropriate for flat terrain; however, this is negated by the type of agricultural activities that will occur. Livestock will produce polluted runoff from manure and crops will be treated with fertilizers and pesticides.

A smaller buffer might be adequate if livestock waste were captured by holding ponds for disposal. Organic crops raised with organic fertilization and without pesticides of any kind would reduce polluting runoff. However, a 40 ft buffer will still likely be inadequate to protect the trout fishery of the Chattooga River, especially during heavy rainfall events as often occur in that area.

The SC Council of Trout Unlimited asks that the USFS revisit the EA for this project with particular attention to buffer requirements for trout streams.

*Malcolm Leaphart, Chair
SC Council Trout Unlimited
115 Conrad Circle
Columbia, SC 29212*

From: Rebekah <rebekahrox@sc.rr.com>
Sent: Monday, June 11, 2012 8:50 AM
To: FS-comments-southern-francismarion-sumter
Subject: The Russell Farm

Leave the land alone. Let it go back to nature as nature intended. I view this whole project with deep suspicion. Someone in power is making money somewhere or gaining some benefit somewhere at taxpayers or the land's expense.

**Rebekah Pearson
Columbia, SC**



From: Mark Gould <Mark@steamatic.tv>
Sent: Thursday, June 14, 2012 8:01 AM
To: FS-comments-southern-francismarion-sumter
Subject: Russell House development

NO NO and NO

You are forest service NOT a theme park. DO NOT do this

[Mark N. Gould](#)

From: Lisa McAdams <lisalookstwine@gmail.com>
Sent: Friday, June 15, 2012 11:57 PM
To: FS-comments-southern-francismarion-sumter
Subject: Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor

Dear Sir:

I oppose the proposal of "Establishing a Southern Appalachian Farmstead in the Chattooga Wild & Scenic River Corridor" for the reasons listed below:

1. The scale of the proposed scale of development for **the farmstead is in violation of the management guidelines** for designated recreational river swedtionw on th Dhattooga River. These management guidelines must not be changed through a foest plan amendment.
2. The Wild & Scenic Rivers Act (WSRA) calls for non-degradation and enhancement of the resource. **The impacts of the proposed farmstead directly conflict with river protection standards and guidelines**, Therefore, the farmstead should not be permitted.
3. The **farmstead would cause unacceptable, localized degradation of the Chattooga River's Outstanding Resource Values** of wildlife, botany, fisheries, recreatrion, scenery and "experence" (i.e. sights, sounds and solitude). Therefore, the farmstead should not be permitted.
4. The Sumter Forest Plan standards of 100-foot stream buffer protections must be maintained in the Chattooga Wild & Scenic River Corridor. **Reductions in these stream buffer protections through a Forest Plan amendment must not be permitted.**

In view of the many negative impacts on the Chattooga River's Wild & Scenic Corridor, the "Southern Appalachian Farmstead" proposal should not be permitted.

Regards,

Lisa McAdams
261 Well Mountain Rd.
Westminster, SC 29693.



Rabun Chapter of Trout Unlimited
PO Box 371 Clayton, GA 30525

May 22, 2012

Paul Bradley, Forest Supervisor
Francis-Marion National Forests
4931 Broad River Road
Columbia, SC 29212

Thank you for giving the Rabun Chapter of Trout Unlimited the opportunity to comment on the proposed Southern Appalachian Community project on the Andrew Pickens Ranger District. Please incorporate these comments into the public record.

The Rabun Chapter supports the concept of preserving the culture and heritage of the Southern Appalachians. However we have several specific concerns regarding the Proposed Action, Alternative 2, in relation to how the Project may affect the cold-water fisheries and its users:

1. Restrict the use of parking by historic site visitors at the existing Hwy 28 bridge trailhead. This area already experiences heavy parking use by traditional users, including fishermen and hikers, and cannot support additional users.
2. We do not support adjusting the Forest Plan's existing riparian corridor minimum buffer widths. Continue to use the 100 foot minimum riparian corridor buffer width.
3. We do not support the tethering or corralling of pack, stock, or draft animals within 100 feet of any stream courses.
4. Regarding tree removal within riparian corridors, leave approximately 50 square feet of basal area in overstory trees within 100 feet of streams, or all overstory trees within 100 feet of streams if less than 50 square feet of basal area exists.
5. We do not support the use of pesticides within 100 feet of any stream.
6. Provide training and support for the full-time OHC caretaker to conduct additional FS duties, such as enforcing boating regulations on the Chattooga River and conducting water quality monitoring.

Again, thank you for your consideration of these comments.

Pat Hopton
Rabun Chapter President