



June 29, 2012

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Re: Site visits for boater access to the Chattooga Wild and Scenic River

Dear Decision-makers:

Thank you for hosting site visits to present proposed access for boaters to the Upper Chattooga Wild and Scenic River Corridor ("River"), and for considering these comments, submitted on behalf of **Georgia ForestWatch** ("GAFW"),¹ the **Georgia Chapter of the Sierra Club**,² and **Wilderness Watch**³ (collectively, "Advocates"). These comments are in large measure a compilation of the observations of attendees of the site visits from each of these three groups and of those familiar with the area because they regularly visit.

Those who participated in the site visits reported a distinct impression that there are many unknowns with regard to proposed access. At this point in the analysis process, this is entirely appropriate. Advocates look forward to the opportunity to comment more substantively on the specific proposals you have stated will emerge from this process,

¹ Mailing address: Georgia ForestWatch, c/o Mary Topa, 15 Tower Road, Ellijay, GA 30540; telephone: 706-635-8733.

² Mailing address: Georgia Chapter Sierra Club, c/o Colleen Kiernan or Larry Winslett, 743 East College Avenue, Suite B, Decatur, Georgia 30030; telephone: 404-607-1262, fax: 404-876-5260.

³ Mailing address: Wilderness Watch, PO Box 9175, Missoula, MT, 59807; Telephone: 406-542-2048.

including the analysis pursuant to the National Environmental Policy Act (“NEPA”) that would need to accompany any such proposals.

While GAFW has appealed the Decision Notices that set this process of evaluating potential access features in motion, as always, it looks forward to working with the Forest Service to ensure the very best management of these special public lands, including the River and the Ellicott Rock Wilderness, regardless of the outcome of the appeal process.⁴

I. GENERAL COMMENTS

II. CONSIDER ALL IMPACTS OF PROPOSED ACCESS THROUGH AN APPROPRIATE NEPA ANALYSIS.

Pursuant to the National Environmental Policy Act (“NEPA”), the Forest Service must perform a thorough analysis of access features for boaters (e.g., parking, put-ins, take-outs, trails) addressing, among other things, direct, indirect, and cumulative effects and any connected actions before a decision can be made. Because boaters can be expected to pass through several districts, access feature decisions should be coordinated to avoid ad hoc management of the River.⁵

The impacts of access features (those displayed at the site visits and others) have not been previously addressed. The Forest Service did not evaluate site-specific implementation activities in the *Environmental Assessment: Managing Recreation Uses in the Upper Segment of the Chattooga Wild and Scenic River Corridor* (January 2012) (“2012 EA”), delaying that work until later.⁶ Where, an issue has not been analyzed in an earlier environmental document to which the site-specific document may tier, the scope of the required analysis in the project-specific EA is correspondingly increased.⁷ By no means should the Forest Service consider using multiple categorical exclusions to avoid its duty pursuant to NEPA to analyze the individual and cumulative impacts of boater access features.

⁴ *Decision Notice and Finding of No Significant Impact: Amendment #22 to the Nantahala and Pisgah National Forests Land and Resource Management Plan, Managing Recreation Uses in the Upper Segment of the Chattooga Wild and Scenic River Corridor* (signed by Acting Forest Supervisor Diane Rubiaco on January 31, 2012) (“NCDN”); *Decision Notice and Finding of No Significant Impact: Amendment #1 to the 2004 Revised Land and Resource Management Plan Chattahoochee-Oconee National Forests, Managing Recreation Uses in the Upper Segment of the Chattooga Wild and Scenic River Corridor* (signed by Forest Supervisor George Bain on January 31, 2012) (“GADN”); and *Decision Notice and Finding of No Significant Impact: Amendment #1 to the 2004 Revised Land and Resource Management Plan Sumter National Forest, Managing Recreation Uses in the Upper Segment of the Chattooga Wild and Scenic River Corridor* (signed by Forest Supervisor Paul Bradley on January 31, 2012) (“SCDN”) (collectively, “Decision Notices”).

⁵ This review is made all the more important because there is no current Comprehensive River Management Plan for the River, as is required by law.

⁶ See, e.g., SCDN, p. 5 ¶ 9 (“Trails will be designated on future site-specific NEPA analysis”).

⁷ *Kern v. United States BLM*, 284 F.3d 1062, 1078 (9th Cir. Or. 2002), *Sierra Club Northstar Chapter v. Bosworth*, 428 F. Supp. 2d 942, 949 (D. Minn. 2006), *Heartwood, Inc. v. U.S. Forest Serv.*, 380 F.3d 428, 430 (8th Cir. 2004).

In establishing new trails, and particularly wilderness and riparian access trails, the Forest Service should consider, among other things, the needs and likely use patterns of anglers, hikers, and swimmers, in addition to boaters. Trails are likely to be used by visitors engaged in many different kinds of activities. Trails and River access should be clearly marked so that all users are encouraged to limit the proliferation of user-created features, which are the source of environmental degradation. Any new Spur trails should be developed as part of the overall trail system based on suitability of the topography, location of sensitive species,⁸ and how they integrate with the existing trail system. The County Line Road/Trail is part of an active timber sale. The safety and environmental implications of that situation should be addressed. Each of the proposed access features should be observed during wet weather and at high flows.

III. USER-CREATED FEATURES SHOULD NOT BE RELIED ON FOR ACCESS.

At the site visits, at least one ranger commented that the Forest Service would not finally identify and create access, portage and scouting trails, and put-ins and take-outs until boaters had some experience with the sites during actual conditions. This implies that access will occur via user-created trails (existing or new), at least at first. The *Environmental Assessment: Managing Recreation Uses in the Upper Segment of the Chattooga Wild and Scenic River Corridor* (January 2012) (“2012 EA”) describes user-created trails as those that:

are created by forest visitors, often during recreational activities such as fishing, camping and hiking, or to access certain areas such as boating put-ins or take-outs or other specific points of interest. These trails are often poorly located, within close proximity to streams or streambanks, do not meet trail design specifications/standards, receive no maintenance and do not meet erosion control specifications. User-created trails often lead off a designated/system trail and go down steep slopes to a major stream or the Chattooga River.⁹

User-created features are “chronic sediment sources.”¹⁰ The soils of the River area are described as having “high erosive potential.”¹¹

The Finding of No Significant Impact for selected Alternative 13A allowing boating was based on an analysis in which it was assumed that “[a]ll put-ins and take-outs would be designated and maintained to minimize sediment input to the river.”¹² If the Forest Service intends to abandon the plan to actually designate and maintain access features, and instead rely on access dictated by users, then anticipated environmental impacts are greater, and the 2012 EA will need to be revised.

⁸ By way of example--at least one sensitive species, Oconee Bells (*Shortia galacifolia*), exists in the area of some of the potential access features that were part of the site visits.

⁹ 2012 EA, p. 53.

¹⁰ 2012 EA, p. 297.

¹¹ 2012 EA, p. 300.

¹² 2012 EA, p. 327, see also 2012 EA, pp. 39, 297, 328, 329.

**IV. THE FOREST SERVICE SHOULD FOLLOW ITS TRAIL DESIGNATION,
CONSTRUCTION, AND MAINTENANCE POLICY FOR ACCESS FEATURES.**

It would be unusual and inappropriate for the Forest Service to simply rely on user-created trails for access. The Forest Service Manual requires that the Forest Service “[f]ollow the direction in FSH 2309.18, Trails Management Handbook, chapters 10 and 20, when developing, reconstructing, or maintaining trails.”¹³ The Forest Service must “[a]pply the National Quality Standards for Trails in the planning, construction, maintenance, condition assessment, and management of NFS trails, in accordance with FSH 2309.18, section 15.”¹⁴ It must also “[c]onsider available resources and maintenance costs when deciding to construct new trails, reconstruct existing trails, or convert other types of routes to NFS trails.”¹⁵ It must “[m]anage each trail to meet the [trail management objectives (“TMOs”)] identified for that trail, based on applicable land management plan direction, travel management decisions, trail-specific decisions, and other related direction, as well as management priorities and available resources. For each NFS trail or NFS trail segment, [it must] identify and document its TMOs, including the five Trail Fundamentals, Recreation Opportunity Spectrum classifications, design criteria, travel management strategies, and maintenance criteria.”¹⁶

**V. ACCESS ROUTES SHOULD BE ESTABLISHED TAKING INTO CONSIDERATION
ACTUAL ENFORCEMENT CAPACITY**

Excellent trail placement is a necessity. There are only two river rangers. It is clear that the Forest Service will have to rely on passive direction of use rather than active enforcement of rules. The proposed put-ins and take-outs, with the exception of the Bull Pen Bridge, all require hiking for some distance with boating gear. The Forest Service must consider its actions in light of its actual enforcement capacity. Are existing or expected resources adequate to prevent access at Grimshawes Bridge or by by-passing the Lick-Log take-out and using the Route 28 Bridge as a take-out by boaters who wish to avoid hiking? Advocates note that this is not only a boater issue—numerous user-created trails and unauthorized and trashed campsites were observed on the site visits, and visitors other than boaters may use trails established by boaters and visa-versa.

**VI. ACCESS ROUTES SHOULD BE PLANNED TO PREVENT AN INCREASE IN USER-
CREATED ACCESS FEATURES.**

Advocates are concerned that the addition of boating to the Upper Chattooga may cause a sharp increase in user-created features. On the Lower Chattooga, where boating accounts for 95% of visitors to the Chattooga Corridor, user-created trails very close to the River

¹³ Forest Service Manual (“FSM”) § 2353.25.1. See also FSH § 2309.18, Trail Management Handbook, chapter 30, for direction on preconstruction and reconstruction of NFS trails. As applicable, when constructing trails, comply with EM-7720-103, “Standard Specifications for Construction of Trails,” and EM-7720-104, “Standard Drawings for the Construction and Maintenance of Trails,” FSM § 2353.26.

¹⁴ FSM § 2353.15.

¹⁵ FSM § 2353.25.2.

¹⁶ FSM 2353.12; see also FSM 2353.14 (“Use the [recreational opportunity spectrum] in trail planning, development, and operation (FSM 2310 and FSH 2309.18, Trails Management Handbook, chapter 10).”)

are much more common than on the Upper Chattooga (Table 1).¹⁷ As discussed above, user-created features are responsible for considerable sedimentation. Care must be taken in establishing access routes to minimize the temptation by users to create more user-created features.

Table 1: User-created trails greater in areas where boating permitted.¹⁸

Reach	Designated Trails within 100 ft. of River (mi)	User-created Trails within 100 ft. of River (mi)	Percentage of Trails that are User-created Trails within 100 ft. of River	Designated Trails within 20 ft. of River (mi)	User-created Trails within 20 ft. of the River (mi)	Percentage of Trails that are User-created Trails within 20 ft. of River
Upper Chattooga (21 miles)	9	9.8	52%	1.22	1.41	54%
Lower Chattooga (36 miles)	5.7	12.7	69%	.6	3.9	87%

VII. PROTECT THE CHATTOOGA RIVER TRAIL EXPERIENCE.

The Chattooga River Trail should continue to provide limited access to and from the River only at well-sited locations and provide no access to the River for at least the first mile from any parking area on each bank to help protect riparian resource from overuse, and continue to offer the currently-enjoyed remote experience.”

VIII. ROUTES SHOULD BE DESIGNATED CONSIDERING EMERGENCY ACCESS NEEDS.

The 2012 EA anticipates between 5 and 10 search and rescue operations per year. In developing access features, it makes sense to consider where emergency access may be needed at each point and to use that information to inform access feature selection and design. Access features will need to be made part of a search and rescue plan and a pre-accident plan that will both protect users and the River and the Ellicott Rock Wilderness. Such planning should be made part of a Comprehensive River Management Plan.

IX. BOATER ACCESS MUST BE IN COMPLIANCE WITH FEDERAL REGULATIONS.

The location of registration stations for boaters who will enter South Carolina and Georgia is prescribed by federal regulation.¹⁹ Please address compliance with this regulation when establishing access features.

¹⁷ A 2002 survey reported that the primary purpose for 95% of the visits to the lower Chattooga was to “float” the River.

¹⁸ 2012 EA, Tables 3.1-4 and 3.1-9.

¹⁹ See 36 C.F.R. § 261.77.

X. USE BY INTERMEDIATE TO EXPERT BOATERS SHOULD BE ANTICIPATED.

Only expert skill levels were considered relevant to a review of access feature needs. Although appropriate for the class V Chattooga Cliffs stretch, the 2012 EA considers the area below Bull Pen a class III-IV creek with one class V rapid. Therefore the portage and scouting needs and impacts of intermediate and advanced boaters requires consideration.

XI. USE AT A RANGE OF FLOW LEVELS SHOULD BE ANTICIPATED.

The EA 2012 documented a range of flows where boating would be expected extending as high as 1,000 cubic feet per second measured at the Burrells Ford Bridge. Whether the put-ins and take-outs that were the subject of the site visits are in fact appropriate at both lower and higher flows should be assessed.

XII. MONITORING SHOULD BE EMPLOYED TO DETECT DEGRADATION OF RESOURCES.

In light of the minimal pre-access analysis that is planned, and the high potential for degradation caused by user-created features, Advocates were disturbed to hear at least one ranger say that monitoring for biological impacts of access features is not planned. The Decision Notices purport to “[d]evelop a monitoring program to detect when use is approaching capacities and develop more precise relationships between the amount of use and impacts; if monitoring reveals undesired consequences, adaptive management will trigger actions to keep use levels from exceeding capacity.”²⁰ “Impacts to vegetation in riparian areas can occur even with low to moderate usage levels.”²¹ Without monitoring of access impacts, the entire adaptive management framework will fall apart because degradation of the River and Ellicott Rock Wilderness will not be detected. Please reconsider and add a monitoring plan for access features.



Figure 1: Badly eroded user-created feature used to access the River at Greens Creek.

XIII. PROPOSED ACCESS POINTS

Below is a summary of the compiled comments of GAFW members on the specifically-proposed access features.

XIV. GREENS CREEK ACCESS

The site visit to the Greens Creek area included examination of multiple spur trails leading from the Chattooga River Trail to the River. Most are in poor condition, are overgrown, and not a few are eroded logging roads. None appear suitable for use without maintenance and/or reconstruction. Clearly some should be obliterated. The best tend to direct users onto private land belonging to a

²⁰ See, e.g., GADN, p. 2.

²¹ 2012 EA, pp. 300, 303

nearby church, which should be avoided. The proliferation of spur trails in the riparian zone indicates that even without boating the existing trail network is not meeting the need for access the water. Creating some well-constructed trails to the River while closing many of the user-created trails in this area is a good idea.

A. UPPERMOST SPUR TRAIL—FIRST SPUR TRAIL VISITED



Figure 2: First proposed spur trail is eroded down to bedrock.

This proposed access feature should be abandoned. This first and uppermost spur trail presented for potential River access was estimated at .28 miles from the main trail, but it is actually closer to half a mile through meandering, overgrown, and steep trail. It was eroded down to bedrock and slick for a long stretch. At one point during the site visit, participants had to navigate a six-foot deep gully. Hikers familiar with the area report that this trail is actually an ephemeral stream that is slippery and difficult to hike following rain events. It would be treacherous for anyone carrying equipment down to

the River, and users would probably develop alternative routes. However, once the River is attained by this route, access is from a rock bank that would be appropriate for boat launching.

This trail would require significant maintenance and probably reconstruction because it is mostly located on a steep slope that, once waterlogged by heavy rains (when boaters will visit), would create severe likelihood of erosion and sedimentation. GAFW does not support access for any significant number of users by this route, and especially not under wet weather conditions.

B. SECOND PROPOSED SPUR TRAIL



Figure 3: Riverside at the second-visited spur trail, Green Creek.

The site visit included consideration of a second spur trail, slightly downstream of the first, and located off the second switchback. This second access route utilizes more of the maintained Chattooga River Trail without changing in any significant measure the distance boaters would need to traverse to reach the River from the parking area. Access here is superior to access from the uppermost spur because of two things: (1) it would provide access to the River from the Chattooga River Trail once it becomes visible

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to hikers which might minimize new user-created features, and (2) access here would provide a designated take-out point for anglers fishing upstream from Norton Mill Creek. A trail at this location could be expected to provide, in the public perception, a designated point of entry that will reduce the proliferation of spur trails and riparian impact from anglers, hikers and, if allowed, boaters.

Advocates prefer this access to the first-visited access point because it would require less trail construction and cause a lower maintenance burden than the first-visited access point. However, it would require some new construction to mitigate steep portions of the existing user-created feature.

One problem with this access point is that, at riverside, it has little level ground. This is a sandy point above a large rock pile and subject to change as noted by the downed trees and debris braced across the River.

C. OTHER SPUR TRAIL SITES

There are additional and shorter, undesignated spur trails to the River between Norton Mill Creek and the initial switchbacks heading down to the River. Most are over banks with poor access and far further down the Chattooga River trail, and so not preferred.

XV. COUNTY LINE ROAD/TRAIL ACCESS

County Line Road/Trail is neither a designated road nor a designated trail. It is a known illegal access point to the Chattooga River for motorized vehicles. As a temporary road, it should have been (or should be) obliterated, instead of offered as an access route to the River.²²

Adding a trail at County Line will interrupt the 5.2 mile segment of the Chattooga River Trail from Whiteside Cove Rd to Bull Pen, possibly destroying the unique remote experience along a mountain stream that is not available elsewhere by introducing more people to this area.

A launch site at the campsite below Norton Mill Creek was selected as the best site entering from County Line Road. This site seems to have been chosen primarily because it is already severely impacted. The bank in this area should be monitored and, if erosion is found, it should be moved 100 feet upstream to the rocks below Norton Mill Creek. One issue that must be addressed is how will boaters and other users will be dissuaded from entering the River at other points along the Chattooga River Trail if a new access is created.

It remains unclear whether a parking lot will be constructed at this proposed access point. Although there is no established parking lot, a ranger stated at the open house that no

²² 16 U.S.C.S. § 1608(b). Part of the White Bull Timber sale project was that this temporary road would be “closed and seeded after timber harvest activities are completed.” White Bull EA, p. 25.

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parking was planned at this location. Nevertheless, the North Carolina SOPA for January 1, 2012, to March 31, 2012 (as well as earlier SOPAs) included “County Line Trail/Road CE” where: “The proposed action is to construct a parking area at County Line Trail/Road between Whiteside Cove Road and the Wild and Scenic River boundary, for access to floating the Upper Chattooga River.” This is just another in a long stream of proposals by the Forest Service which include maintenance of this non-system road/trail. Please clarify long-term management intentions for this feature.

County Line Road/Trail is located in Management Area 3B in the Nantahala and Pisgah National Forests. Desired road density in Management Area 3B is 0.5 miles of open road per square mile. Current road density in the Chattooga River Watershed is 2.67 mi/mi².²³ Where desired road density is exceeded, the reason for the exceedance must be documented, and strategies to reduce the road density must be investigated.²⁴ When considering this addition, the Nantahala must also consider that Management Area 3B is supposed to be managed for game and non-game animals that cannot tolerate motorized disturbance.²⁵ Increasing motorized access is therefore inconsistent with the LRMP and cannot be, and has not been, justified.

Despite the problems, GAFW concedes that due to the topography and distance from a road, this access may be the least egregious potential new access point for this area, which includes the spectacular Chattooga Cliffs. That said, it is not ideal. This trail was the furthest by far from any road—requiring a hike of 1.22 miles from the parking to the Chattooga River trail and then an additional hike upriver approximately .4 more miles. At present, County Line Road/Trail is part of an active timber sale. The cumulative impacts of recreational and timber management uses should be considered. Also, the Forest Service should address whether combining these two activities is safe.

XVI. BULL PEN ACCESS

This put-in/take-out is appealing to boaters because it does not require a long hike from the road. Less skilled boaters probably will not use the designated put-in above the bridge because it would immediately thrust them into a difficult rapid. The existing user-created trail below the bridge is steep, slippery, and subject to erosion. This trail would need to be reconstructed or closed and another created.



Figure 4: Difficult rapid immediately at proposed access above Bull Pen Bridge.

²³ 2012 EA, p. 335.

²⁴ Nantahala LRMP, p. III-76.

²⁵ Nantahala LRMP, p. III

The riverbank at the above-bridge location is rock and suitable for launching boats (although the ranger at the site visit was skeptical whether it would exist in high flow conditions). Below the bridge is a sandy bank. At present the bank is fifteen to twenty feet wide, but it may change seasonally, and boating access could cause erosion.

Careful consideration should be given to access below the Bull Pen Bridge and above Burrell's Ford because this area is within the Ellicott Rock Wilderness. The Forest Service's wilderness and trail system policies set design parameters for wilderness access trails, including, for example:

- Appropriate trail width²⁶
- Appropriate number of encounters²⁷

Because this area is so wild, it contains some rare species, including spray cliff communities on Ammons Branch. For any trail construction or designation, the Forest Service should consider to what degree traffic in the area of rare communities will be increased, and the likely impact of the loss of remoteness.



Figure 5: Proposed put-in below Bull Pen Bridge

XVII. BURRELL'S FORD



Figure 6: Trails lining River at Burrell's Ford.

construction, as already discussed. The only obvious access on the Georgia side is down a very steep and narrow user-created trail—nearly a ladder, to which the Forest Service has added some steps, several feet high each, to prevent severe erosion. The river ranger conceded that boaters would be unlikely to use this access, given other options.

User trails already line the riparian area near Burrell's Ford, and should be addressed.

A. ABOVE THE BRIDGE

As in the case of below-bridge Bull Pen access, a take-out/put-in at this location is likely to provide some access into Ellicott Rock Wilderness which will pose a challenge for meeting capacity limits and trail

²⁶ See FSM § 2323, Forest Service Handbook ("FSH") § 2309.18 Ch. 20.6-1; *see also* FSH 2309.18 Ch. 23.11-Exhibit 01 (design tread width for wilderness).

²⁷ See, e.g., Nantahala LRMP, p. III-101.

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The South Carolina side of the River has available parking in close proximity to the River and an obvious and appropriate launching point. This is the best boater access point at Burrell's Ford. User conflict, rather than resource damage, is likely to be the primary issue created by adding boating at this location. The area is heavily used by anglers and hikers.

B. BELOW THE BRIDGE

A put-in/takeout below Burrell's Ford may create user conflict with campers, hikers, and front country anglers with whom this area is very popular. Access below the bridge is more easily attained from the Georgia side, where there is a parking limitation.

XVIII. LICK LOG TAKE-OUT

Boating is not allowed between the Lick Log proposed take-out and the Highway 28 Bridge, although some boaters would clearly prefer to float further downstream to the Highway 28 Bridge to exit the River. At the site visit there was some disagreement about whether there would be conflict with anglers if a Highway 28 Bridge take-out were allowed. Advocates believe there would be. Nevertheless, given access, it seems clear that some boaters will use the Highway 28 Bridge to exit the River regardless of the rules, simply because the access is much more convenient.

Getting out at the proposed take-out, as it is presently configured, will be difficult. Boaters who attended the site visit conceded this. The access requires a significant hike for a person carrying a boat--it is a little over a mile to the parking lot from the take-out. Some of this mile, especially near the River, is fairly steep. A couple of boaters indicated that they would have to drag their boats up this trail and that it would be an arduous task. This user-created section goes straight up the fall line, and is already a sediment source. Dragging boats would add to this problem. The ranger at the site visit acknowledged that the Forest Service would need to work on this section--building in some steps, for example--to make it usable. The more prudent course probably would be to redirect the trail to create some switchbacks to prevent erosion down this steep slope.

At the River there were two campsites that could work as landing sites. These are trash ridden and visitors have been cutting down live trees for their campfires. This abuse should be addressed.

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In conclusion, whether or not the Forest Service proceeds with plans to permit boating in the Upper Chattooga Wild and Scenic River Corridor there is significant work that needs to be done to address issues surrounding access to the River. This work will be made more urgent by the addition of a new use, boating.

Please include Georgia ForestWatch, the Georgia Chapter of the Sierra Club, and Wilderness Watch in any future mailings regarding management of the Chattooga River.

Sincerely,

A handwritten signature in cursive script, reading "Rachel S. Doughty". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right.

Rachel S. Doughty
Attorney for Georgia ForestWatch, Georgia
Chapter of the Sierra Club, and Wilderness
Watch