



United States
Department of
Agriculture

Southern Region
Forest Service



September 2005

Wilson Creek Wild and Scenic River Comprehensive River Management Plan

Nantahala-Pisgah Land and Resource Management Plan Amendment 18

Decision Notice

and

Finding Of No Significant Impact

Grandfather Ranger District, Pisgah National Forest
Avery and Caldwell Counties, North Carolina

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 14th and Independence Avenue, SW, Washington, DC 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.

Decision Notice
& Finding of No Significant Impact

Wilson Creek Wild and Scenic River
Comprehensive River Management Plan

USDA Forest Service
Grandfather Ranger District, Pisgah National Forest
Avery and Caldwell Counties, North Carolina

Decision and Rationale for the Decision

Decision

Based upon my review of the alternatives, I have decided to select **Alternative 2** (Selected Alternative) of the Wilson Creek Wild and Scenic River – Comprehensive River Management Plan (EA – see Chapter 2, page 13) on the Grandfather Ranger District, Pisgah National Forest. The Selected Alternative will:

- Serve as the the Comprehensive River Management Plan (CRMP) for the Wilson Creek National Wild and Scenic River.
- Amend the Nantahala-Pisgah Land and Resource Management Plan (Amendment 18) by updating Management Area (MA) 15 standards and guidelines to emphasize the “enhancement” of Wilson Creek’s Outstandingly Remarkable Values. (Direction and Standards are listed below.)
- Adopt the interim corridor boundary, approximately ¼ mile from each creek bank, as the management boundary for the corridor and MA 15.
- Provide programmatic direction for management of the *wild segment* of the river corridor with a focus on protecting and preserving natural processes with minimal human influences. Recreation management will be designed to provide the most primitive, natural, and remote setting possible. Access to the area is limited to roads outside of the corridor.
- Manage the *scenic segment* of the river corridor with a focus on maintaining and enhancing the near-natural environment. The riverbanks will be largely undeveloped and primitive, but may be accessible in places by roads. Recreation management will be designed to provide a natural-appearing setting with limited improvements.
- Manage the *recreational segment* of the river corridor with a focus on providing river-oriented recreation in natural-appearing or culturally-influenced settings. The river may be readily accessible by roads and trails. Recreational improvements such as trailheads and river access points will be available in some locations.
- Manage all river segments for a variety of non-motorized recreation opportunities throughout the watershed. These activities will be dispersed as much as possible in order to alleviate potential overcrowding or use conflicts. Access points such as trailheads and parking lots will be strategically located in the corridor and watershed to aid in the dispersal of recreation use and enhancement of the Outstandingly Remarkable Values of the Wilson Creek corridor.

General Direction and Standards

(Adjustments to General Direction and/or Standards based on public comments are included below and are underlined.)

Direction for Wilson Creek National Wild and Scenic River		
General direction and standards shown for this management area are only those additional to or more specific than forest-wide direction, MA 15, MA 18, and/or MA 6. Refer to forest-wide direction, MA 15, MA 18, or MA 6 for all activities and practices not addressed here.		
ACTIVITIES	GENERAL DIRECTION	STANDARDS
General	1. Protect and enhance all Outstandingly Remarkable Values for the Wilson Creek Corridor.	a. Manage for the following classifications: Scenic (headwaters to the confluence of Little Wilson Creek); Wild (Little Wilson Creek to the confluence of Crusher Branch); and Recreational (remainder of corridor).
	2. Manage the Wilson Creek corridor according to experience classifications.	
	3. Evaluate the effect of water resources projects on the river's free-flowing condition, water quality, and Outstandingly Remarkable Values. Refer to agency policy for evaluation procedures (under WSRA Section 7 authority).	
Visual Resource Management	1. Manage to maintain the unique characteristics and scenic values of the river corridor.	a. Meet a Visual Quality Objective (VQO) of Preservation in Wild Segments. Meet a VQO of Retention in Scenic Segments. In Recreational Segments, meet a VQO of Retention in Variety Class A landscapes and meet a VQO of Partial Retention in Variety Class B or C landscapes.
	2. Provide opportunities to view the scenic features without detracting from the visual quality of the feature.	a. Maintain existing vistas, and consider opening new vistas where appropriate.
Dispersed Recreation Management	1. Emphasize river oriented non-motorized recreation opportunities favoring hiking, fishing, boating, viewing wildlife and scenery, and nature observation.	a. Manage for the following experiences in each river segment: <i>Scenic:</i> Roaded Natural 2 (RN2); <i>Wild:</i> Semi-Primitive Non-Motorized (SPNM); <i>Recreation:</i> Roaded Natural 1 (RN1) and RN2.
		b. Provide for hunting and fishing consistent with established game laws and river values.
		c. No motorized watercraft will be allowed on all sections.
	2. Provide no opportunities for Off-Highway Vehicles apart from those allowed on system roads.	
	3. Provide facilities as needed for public safety, resource protection, and enhancement of the recreational experience.	

Direction for Wilson Creek National Wild and Scenic River		
General direction and standards shown for this management area are only those additional to or more specific than forest-wide direction, MA 15, MA 18, and/or MA 6. Refer to forest-wide direction, MA 15, MA 18, or MA 6 for all activities and practices not addressed here.		
ACTIVITIES	GENERAL DIRECTION	STANDARDS
	4. Allow primitive camping at designated areas only.	a. Allow evidence of use to be noticeable but not dominant.
	5. Manage use to provide a level of contact among visitors and impacts to the Outstandingly Remarkable Values that is consistent with the river classification. Use the Limits of Acceptable Change (LAC) concept to monitor levels of use within the river corridor.	a. Conduct a site condition inventory to determine use patterns, site conditions, and their specified limits to be monitored.
		b. Rehabilitate degraded sites and if necessary, relocate or restrict use at those sites.
		c. Prioritize rehabilitation of impacted sites with over 200 square feet of exposed soil in the Recreation Segment, and over 100 square feet of exposed soil in the Scenic and Wild Segments.
Developed Recreation Management	1. Expansion or renovation of existing facilities will be considered before development of new facilities.	
	2. New facilities will be developed only if use levels indicate additional developed site capacity is needed and facilities are compatible with management area objectives.	
	3. New development will be designed to minimize disturbance of wildlife and move use away from sensitive riparian areas to the extent possible while still providing access to the river at designated locations.	
	4. Barrier-free facilities will be provided in accordance with applicable federal, state, and local laws and regulations.	
Cultural Resource Management	1. Manage historic and prehistoric sites consistent with forest-wide standards.	a. Consult with the Forest/Zone Archeologist prior to implementing any ground disturbing activities.
	2. Identify areas with highest potential for interpretation and enhancement.	
	3. Stabilize and protect existing sites.	
	4. Allow research if all Outstandingly Remarkable Values are protected.	
Trails Management	1. Manage for a variety of trail uses compatible with the Outstandingly Remarkable Values of the corridor.	a. Permit bicycles, horses, and llamas on designated trails only.
		b. No off-road or off-trail, cross country travel by bicycles, horses or llamas will be allowed on public lands within the river corridor.

Direction for Wilson Creek National Wild and Scenic River		
General direction and standards shown for this management area are only those additional to or more specific than forest-wide direction, MA 15, MA 18, and/or MA 6. Refer to forest-wide direction, MA 15, MA 18, or MA 6 for all activities and practices not addressed here.		
ACTIVITIES	GENERAL DIRECTION	STANDARDS
	2. Manage and construct trails for a variety of difficulty levels dependent on the desired recreation experience.	a. Manage trails for the following difficulty levels: Recreational Segment: “Easiest” to “Moderate” Wild and Scenic Segments: “Easiest” to “Most Difficult”
	3. Provide access for use and enjoyment of the rivers consistent with the river classification.	a. Favor access that provides viewing opportunities in scenic sections. Design trails for resource protection and some user comfort. b. Manage for more concentrated use in recreation sections. Provide for user comfort, safety, and resource protection. c. Rehabilitate or relocate degraded access trails and steps.
	4. Maintain and construct trails consistent with river classification.	a. Maintain trails to the following standards in each river segment: <i>Wild</i> – Maintenance Levels 1-3 <i>Scenic</i> – Maintenance Levels 2-3 <i>Recreational</i> – Maintenance Levels 3-5.
Wildlife and Fish Resource Management	1. Manage streams for self-sustaining fish populations where conditions are favorable. Provide conditions for the large group of game and non-game animals that are dependent on aquatic and riparian systems. Emphasize habitat for specific Management Indicator Species which represent this group.	a. Manage habitat primarily for raccoon, pileated woodpecker, trout, and smallmouth bass.
	2. Manage streams for wild trout where conditions are favorable. Identify trout streams using designations by the North Carolina Wildlife Resources Commission or where population inventories indicate self sustaining populations.	a. Improve habitat of wild trout streams as a first priority. b. Improve stability of stream banks and native riparian vegetation.
	3. Retain suitable cavity trees, well dispersed throughout the area.	
	4. Manage to enhance and interpret the Outstandingly Remarkable Fish and Wildlife Values of Wilson Creek.	
	5. Maintain appropriate stream temperatures and stream environment, and protect stream banks.	

Direction for Wilson Creek National Wild and Scenic River		
General direction and standards shown for this management area are only those additional to or more specific than forest-wide direction, MA 15, MA 18, and/or MA 6. Refer to forest-wide direction, MA 15, MA 18, or MA 6 for all activities and practices not addressed here.		
ACTIVITIES	GENERAL DIRECTION	STANDARDS
Land Adjustment and Rights-of-Way	1. Pursue opportunities for acquisition of private lands within river corridors whenever made available to protect and enhance the Outstandingly Remarkable Values of the corridor.	a. Consider scenic or conservation easements to protect river values only when acquisition of fee simple title is improbable.
Transportation System Management	1. Manage existing roads as necessary to maintain or enhance the Outstandingly Remarkable Values of the corridor.	a. Decommission roads, if necessary, to maintain or enhance the Outstandingly Remarkable Values of the corridor.
	2. Provide parking where possible to support an appropriate level of river corridor use. Avoid over-concentration of parking areas.	
Road Planning, Construction and Maintenance	1. Allow no new road construction which would be open to public motorized vehicles except to access facilities such as put-in/take-out areas, developed recreation sites, or other similar recreation facilities.	
Wildfire Management	1. Suppress wildfires using techniques which will have the least impact on special features in the corridor.	a. Emphasize hand tool construction of fire lines. Permit machine use only when a fire line constructed with hand tools would be ineffective for fire control.
Prescribed Burning	1. Use prescribed burning as necessary to maintain or enhance the unique resource values of the area.	
	2. Use only prescribed fire that does not kill the shade provided by a forest canopy or expose mineral soil by consuming the duff and humus layers.	
Interpretation and Education	1. Interpretive programs will be designed to improve public awareness and understanding of the Outstandingly Remarkable Values of Wilson Creek and the National Wild and Scenic River System, including emphasizing Leave No Trace principles . The size and type of program may vary with the recreational setting of each segment.	a. Provide cooperative interpretive opportunities with other agencies and organizations as appropriate. Incorporate river stewardship as the unifying educational message.
		b. Wildlife interpretation will focus on habitat protection, species that wildlife viewers will have a high likelihood of seeing, and educating the public in the importance of wetlands, meadows, snags, and other unique habitats.

Direction for Wilson Creek National Wild and Scenic River		
General direction and standards shown for this management area are only those additional to or more specific than forest-wide direction, MA 15, MA 18, and/or MA 6. Refer to forest-wide direction, MA 15, MA 18, or MA 6 for all activities and practices not addressed here.		
ACTIVITIES	GENERAL DIRECTION	STANDARDS
Vegetation Management	1. Manage the river corridor as not suitable for timber production.	a. Refer to Forest-wide Direction for a list of tree cutting practices appropriate to land not selected for timber production.
	2. Generally allow natural processes to determine the composition and distribution of plant species.	
	3. Use native plant species where possible when restoring impacted sites.	
	4. Allow for vegetation management in order to treat noxious weeds, insects and disease, infested trees, and/or for salvage operations.	a. Minimize the use of mechanical equipment that would disturb the stream environment. b. Use of herbicides/pesticides would only be allowed after proper environmental analysis has occurred and only those chemicals suitable for the river environment.
Minerals Management	1. Allow no new commercial mineral activities.	
	2. Allow mineral permits in existence prior to August 2000 to continue operation until the permit expires. Once the permit expires, the site will be rehabilitated and no new permits will be issued for the site.	
Special Uses	1. Issue permits for new special uses only when compatible with special values of the area.	a. Allow no more than two commercial, non-instructional boating outfitter permits within the Recreational section of the River. Allow no more than <u>120</u> commercial boaters per day (<u>not including guides</u>), in groups of 6-15 from the date the CRMP is signed. Commercial groups of 5 or less (<u>not including guides</u>) are not included in the <u>120</u> boater limit. No commercial, non-instructional boating outfitter permits will be issued in either the Wild or Scenic sections.

Direction for Wilson Creek National Wild and Scenic River		
General direction and standards shown for this management area are only those additional to or more specific than forest-wide direction, MA 15, MA 18, and/or MA 6. Refer to forest-wide direction, MA 15, MA 18, or MA 6 for all activities and practices not addressed here.		
ACTIVITIES	GENERAL DIRECTION	STANDARDS
		<p>b. Limit commercial guided angling permits, instructional boating permits or other water-based activity permit not already mentioned to groups of five or less (not including guides), from the date the CRMP is signed. Existing permits will be amended upon renewal.</p> <p>c. Limit land-based permits to groups of no more than 15 (not including guides) from the date the CRMP is signed. Existing permits will be amended upon renewal.</p> <p>d. Stipulate in every commercial permit provisions for adequate dispersal of use throughout the day and season to prevent overcrowding. Commercial boating launch intervals will be specified in outfitter permits.</p> <p>e. Allow camping by commercially outfitted groups, or other groups under permit, only in designated areas.</p>
	2. Issue permits for research activities only when compatible with the Outstandingly Remarkable Values of Wilson Creek.	a. Mark test plots in a temporary and inconspicuous manner not visually evident to the casual observer.
	3. Educational programs which promote understanding of river ecosystems will be given preference when issuing new special use permits.	
Soil and Water	1. Maintain soils in a natural undisturbed state except for trail construction and maintenance, watershed restoration projects, wildlife improvement measures, wildfire suppression measures, recreation and site rehabilitation projects.	a. Stabilize dispersed recreation sites within the riparian area that have exposed and/or highly compacted erodible mineral soil.
	2. Continue to cooperate with and encourage enforcement of State water quality standards and environmental protection regulations on private lands within the Wilson Creek watershed.	
Gathering Forest Products	1. Issue no permits for the commercial removal of forest products.	
	2. Allow collection of plant products (nuts, berries, cones) for personal use.	

Direction for Wilson Creek National Wild and Scenic River		
<p>General direction and standards shown for this management area are only those additional to or more specific than forest-wide direction, MA 15, MA 18, and/or MA 6. Refer to forest-wide direction, MA 15, MA 18, or MA 6 for all activities and practices not addressed here.</p>		
ACTIVITIES	GENERAL DIRECTION	STANDARDS
	<p>3. Allow collection of specimen plants for research only with Forest Supervisor approval. This requires a special use permit.</p>	
Private Lands	<p>1. Work with landowners to increase or improve existing streamside vegetation to reduce stream temperatures and provide high quality fisheries habitat through the reduction of runoff and sedimentation and the introduction of organic matter.</p>	
	<p>2. Work with landowners to assure compliance with applicable federal, state, and county clean water laws.</p>	<p>a. Any structures that could affect the flow of water, i.e. bridges, bank improvements or docks, require an Army Corp of Engineer permit and potentially a Section 7 evaluation by U.S. Forest Service.</p>
	<p>3. Work with landowners to accomplish fuel reduction around homes.</p>	
	<p>4. Work with National Forest visitors to increase awareness of private land along the corridor to reduce trespass and resource damage caused by such trespass.</p>	
	<p>5. Work with landowners to increase public access points to National Forest lands.</p>	
	<p>6. Work with landowners to prevent the spread of noxious weeds and non-native species onto Forest Lands.</p>	
	<p>7. Develop awareness among government and private agencies and develop stewardship roles and responsibilities.</p>	

Rationale

As stated in Chapter 1 of the EA, the purpose and need (objectives) for the proposal is to fulfill the requirements of Section 3(d)(1) of the Wild and Scenic Rivers Act that states that “the Federal agency charged with the administration of each component of the National Wild and Scenic Rivers System shall prepare a comprehensive management plan...to provide for the protection of river values. The plan shall address resource protection, development of lands and facilities, user capacities, and other management practices necessary or desirable to achieve the purposes of this Act. The plan shall be prepared, after consultation with State and local governments and the interested public within three full fiscal years after the designation.”

I believe the Selected Alternative will accomplish this objective by providing direction that will protect and further enhance the outstandingly remarkable values of Wilson Creek while addressing the public's concerns. (See Appendix A for public comment highlights and the Agency's response.)

In reaching my decision, I began by once again reviewing the purpose and need for the project and all of the alternatives presented in the Environmental Assessment (EA). I then weighed the effects analyses of the alternatives analyzed in detail and the public comments received on the EA. The Wilson Creek Interdisciplinary Team (IDT) validated existing field surveys and conducted database queries in order to develop programmatic direction to further enhance and protect the Outstandingly Remarkable Values of Wilson Creek. During their analysis, they took a hard look at past, present, and reasonably foreseeable future actions that could be combined with expected effects from the Wilson Creek proposal. I believe they provided me sufficient analyses and conclusions to make a reasoned decision.

The Selected Alternative will affect approximately 17 percent of the 44,000-acre Wilson Creek watershed.

Other Alternatives Considered

In addition to the Selected Alternative, I considered one other alternative in detail: Alternative 1. (EA, page 10)

Alternative 1

Under Alternative 1, the existing goals, standards, and guidelines that are present in the Nantahala and Pisgah National Forests Land and Resources Management Plan would be applied to the Wilson Creek Corridor. The direction for Management Area 15 (Designated National Wild and Scenic Rivers) would remain unchanged and *Wilson Creek* would be added to the list of applicable rivers. I did not select this alternative because it presented actions that would only protect, but would not further enhance the Outstandingly Remarkable Values of Wilson Creek. I believe it is important these actions be **implemented to move the area towards the Forest Plan's desired future condition.**

Other Alternatives Not Considered

Page 20 of the EA disclosed one alternative (no action) that I considered but eliminated from detailed study. This alternative would not fulfill the requirements of Section 3(d)(1) of the Wild and Scenic River Act. Since it was not considered in detail in the EA, it was not considered in the range of alternatives for my decision.

Public Involvement

The National Forests of North Carolina began the CRMP process on February 25, 2002, when a letter was mailed to approximately 400 individuals and/or organizations, soliciting comments concerning the

development of the CRMP and advertising a March 19, 2002, public meeting. This same information was used to develop a news release that was sent to area newspapers and posted on the Forest website.

Approximately 100 people, representing a variety of interests, attended the March 19, 2002, public meeting at the Collettsville School in Caldwell County. Approximately 40 questions and comments were captured and utilized to shape the issues for this project. Response to the CRMP process, overall, was very positive and supportive. An invitation to provide written comments was made and most attendees took a comment form with them.

Throughout 2002 and 2003, information concerning the status of the CRMP was included in the Grandfather Ranger District's Outdoor Update which is circulated to area media, outdoor businesses and chambers of commerce. An open house was hosted for the landowners along the corridor in May 2003 to provide an update on the project. Updates were provided to the Caldwell County Commissioners upon request.

A 30-day period of the pre-decisional Wilson Creek Wild and Scenic River EA was initiated on March 31, 2005, and was completed on April 30, 2005. Information was distributed using three methods, direct mail-out of the EA and draft CRMP to 140 people who provided comments during the initial scoping period and required agencies; direct mail-out of a summary newsletter to 175 Wilson Creek landowners, outfitters and guides and meeting attendees who did not provide scoping comments; and posting of the documents on the National Forests in North Carolina website. Eight letters, e-mails and/or oral comments were submitted by members of the public during this period. A summary of the interests is attached to this decision notice in Appendix A. Following review of comments received, the March 2005 EA and Comprehensive River Management Plan (CRMP) were slightly modified to respond to public comments and new information (40 CFR 1503.4). These edits are presented in this decision in the above table or members of the public may request a copy of the updated CRMP or access it from our web site at: <http://www.cs.unca.edu/nfsnc/>.

Findings Required by Laws and Regulations

1. This amendment does not change any Forest Plan land allocation, timber suitability, or type or amount of outputs of good or services provided. Neither the timing of this decision, the location, nor size of the area affected of the area affected are grounds for considering this to be a significant amendment, since this amendment has no impact to forest resources (EA, Chapter II). Therefore, this would not be a significant amendment to the Forest Plan.
2. This amendment will meet all requirements of the Endangered Species Act and all agreements with the State Natural Heritage Program, in that there would be no impacts to Threatened, Endangered, and Sensitive species or critical habitat for these (EA, Chapter IV).
3. The amendment is reasonable and feasible. Implementation of some new monitoring for maintaining the Outstandingly Remarkable Values of Wilson Creek will be needed; however, the Forest has the requisite expertise and access to additional external expertise.
4. There are no irreversible or irretrievable resource commitments and no loss of long-term productivity since this is a programmatic amendment to the Forest Plan and has no ground disturbing effect (EA, Chapter I).
5. The decision to implement the Selected Alternative is consistent with the intent of the long-term goals and objectives required by Section 3(d) (1) of the Wild & Scenic Rivers Act (EA, Chapter 1).

Finding of No Significant Impact

I have determined that this Plan Amendment is not a major federal action, individually or cumulatively, and will not have a significant impact on the quality of the human environment. Since all elements of the alternatives are entirely programmatic in nature, no adverse effects on biological or archeological resources would result from incorporation of the CRMP in the Forest Land and Resource Management Plan (EA, Chapters I and IV). Therefore, an environmental impact statement will not be prepared. I have considered both context and intensity in my determination, based on environmental analysis documented in the Environmental Assessment.

Context

This Plan Amendment adds direction to ensure the ability to maintain and enhance the Outstandingly Remarkable Values of Wilson Creek. The outcomes anticipated from this amendment are: there would be clear direction in the nature of projects proposed and the environmental assessments for projects; and there would be changes in the amounts and types of field data collected for monitoring purposes (EA, Chapter I and IV). It would not have direct, indirect, or cumulative effects on any forest resource.

Intensity

Both beneficial and adverse impacts are considered. There will be no significant effects as a result of the action. The nature of the impacts of this decision has to do with the ability of maintaining and enhancing the Outstandingly Remarkable Values of Wilson Creek and the type of monitoring activities that will occur in the future (EA, Chapter I).

The action will have no discernible effects on the public health and safety. Any activities related to the changes in monitoring will be similar to other forest related outdoor activities such as hiking or nature study.

The action will not have any detrimental effects on any unique characteristics of the geographic area such as historical and cultural resources, prime farm lands, rangelands, parklands, wetlands, wild and scenic rivers, or ecologically critical areas (EA, Chapter IV).

Based on public involvement and analysis, the effects on the quality of the human environment are not highly controversial.

The action does not involve highly uncertain, unique, or unknown environmental risks to the human environment. No direct, indirect, or cumulative effects would occur to any forest resource.

This amendment will change the nature of future projects and activities, and will change some monitoring activities (EA, Chapter I). These changes should provide additional baseline information for Forest Plan revision.

The cumulative effects of the proposed action have been analyzed and no significant effects are anticipated (EA, Chapter IV).

This action does not adversely affect cultural resources listed or eligible for listing in the National Register of Historic Places and will not cause loss or destruction of significant scientific, cultural, or historical resources.

This amendment will have “no effect” on Threatened or Endangered Species and “no impacts” on Sensitive Species. The amendment will not result in a trend to federal listing or cause a loss of viability of any Sensitive species (EA, Chapter IV).

This action does not lead to violation of federal, state, or local laws imposed for the protection of the environment, since there will be no direct, indirect, or cumulative effects on any natural resource (EA, Chapter IV).

Administrative Review and Contacts

This decision is subject to appeal pursuant to 36 CFR 217.3(1). A written appeal, including attachments, must be postmarked or received within 45 days after the date this notice is published in *The Asheville Citizen-Times*. The Appeal shall be sent to:

USDA Forest Service
ATTN: Appeals Deciding Officer
1720 Peachtree Road, N.W., Suite 811 N.
Atlanta, Georgia, 30309-9102.

Appeals may be faxed to (404) 347-5401. Hand-delivered appeals must be received within normal business hours of 8:00 a.m. to 4:30 p.m. Appeals must meet content requirements of 36 CFR 217.9. Appeals may also be mailed electronically in a common digital format to: **appeals-southern-regional-office@fs.fed.us**.

For further information on this decision, contact Steve Hendricks, Planner/Landscape Architect, National Forests in North Carolina at 828-257-4200.

Implementation Date

As per 36 CFR 217.10, unless a stay is granted, implementation of this decision may begin after seven calendar days following publication of the legal notice.

/s/ Monica J. Schwalbach

September 30, 2005

MONICA J. SCHWALBACH
Acting Forest Supervisor
National Forests in North Carolina

Date

APPENDIX A: RESPONSE TO COMMENTS

Wilson Creek Wild and Scenic River Comprehensive River Management Plan Environmental Assessment

General Discussion

The 30-day comment period for the Wilson Creek Wild and Scenic River Comprehensive River Management Plan Environmental Assessment began March 31, 2005, and ended on April 30, 2005. One hundred and sixty-three letters, e-mails and/or oral comments were submitted by members of the public during this comment period. Of these, 154 were a form letters generated by the Blue Ridge Horseman's Association. The following interests were raised during the comment period:

- Commenter 1: Ron Linville, North Carolina Wildlife Resources Commission (NCWRC)
- Commenter 2: Brian Cole, U.S. Fish and Wildlife Service
- Commenter 3: Ben Prater, Southern Appalachian Biodiversity Project (SABP)
- Commenter 4: Jeff Stanley, Wahoo Adventures
- Commenter 5: Kevin Colburn, American Whitewater
- Commenter 6: Bob Hathcock, NOC (oral comments)
- Commenter 7: Bambi Teague, National Park Service
- Commenter 8: Bob Stapleton
- Commenter 9 thru 159: Form Letter Generated by the Blue Ridge Horseman's Association

Letter 1 - Ron Linville, NCWRC

Comment 1-1:

"Based on our review, we believe that Alternative Two (2) is the preferred alternative as this method will encourage protection and enhancement of the Corridor. We offer the following ideas for your consideration as you proceed with your final determination and decisions."

Agency Response

Comment is noted.

Comment 1-2:

"The trout fishery biologist for this area indicated that in the Comprehensive River Management Plan (page 17) under the Wildlife and Fish Resource Management section #2 that the standards column should add a section b. comment to 'improve stability of stream banks and riparian native vegetation.'"

Agency Response

CRMP will be edited to include this statement.

Comment 1-3:

“Is it possible to have an American with Disabilities Act (ADA) trail for access to part of the river? Such access might include an ADA fishing structure.”

Agency Response

This is a site-specific project and is outside the scope of this Environmental Assessment (EA). The Wilson Creek Wild and Scenic River EA is “entirely programmatic in nature...Future actions would require appropriate NEPA documentation” (EA, page 5). Section IV of the Comprehensive River Management Plan (CRMP) “contains the criteria to guide subsequent site-specific agency decisions and a description of the types of probable management actions, including objectives/intent of an action, that may occur within the Wilson Creek corridor (CRMP, page 23). Any site-specific project ideas should be discussed with the Forest/District.

Comment 1-4

“Although not currently proposed to be limited, the number of private boats (canoes and kayaks) allowed may need to be further evaluated and managed through a permit process if user conflicts or user enjoyment becomes diminished.”

Agency Response

Monitoring of the recreation carrying capacity of the river corridor will occur in order to help protect and enhance the corridor’s Outstandingly Remarkable Values. Monitoring and potential remedies will be based on the Limits of Acceptable Change concept (EA, page 51). Monitoring Indicators, Standards and Actions for recreation is presented in the CRMP, page 26.

Comment 1-5

“Only native vegetation should be used for restoration activities. If needed, annual plants may be used for temporary stabilization activities.”

Agency Response

Alternative 2, General Direction for Vegetation Management states, “ 3. Use native plant species where possible when restoring impacted sites.” (EA, page 17)

Comment 1-6

“Photographic evidence and logs should be developed and maintained to document and evaluate changes that occur within the Corridor, especially in areas where human impacts disrupt natural environments, natural forces cause damage, and where restoration activities are provided.”

Agency Response

Section V of the CRMP, page 25, outlines monitoring that will occur in order to determine the extent to which the plan is being implemented, to understand how management of the river corridor is affecting Outstanding Remarkable Values, and to identify conditions needing corrective actions to protect and enhance river values. In addition, Appendix D of the CRMP, page 48, identifies “developing baseline inventories” as an on-going action.

Comment 1-7

“The opportunity to acquire or preserve more property should be evaluated and pursued whenever possible through fee simple purchases or conservation easements.”

Agency Response

Private landowners and local governments have been viewed as partners in protecting the Outstandingly Remarkable Values of Wilson Creek (EA, page 6). This is emphasized in the Direction presented for Alternative 2 for Private Lands (EA, pages 19 and 20). Land purchases or conservation easements would be considered if funds are available.

Comment 1-8

“The protection and restoration of freshwater fisheries and mussels should be evaluated with NCWRC biologists.”

Agency Response

Comment is noted.

Letter 2 - Brian Cole, USFWS

Comment 2-1

“We support the preferred alternative (Alternative 2) as we believe USFS control over what occurs on the river is necessary to protect important natural resources. Further, the preferred alternative also provides flexibility in the management of natural resources. Based on the information provided with your letter and a review of our records, we do not believe the subject project is likely to adversely affect any federally listed species; thus, the requirements of section 7(c) are fulfilled .”

Agency Response

Comment is noted.

Letter 3 – Ben Prater, SABP

Comment 3-1

“The EA does not specify the number of forested acres that will remain as not suitable for timber production within the corridor and where these forested areas are located.”

Agency Response

The proposed direction for Vegetation Management states, “Manage corridor as not suitable for timber production” (EA, page 17). The decision would “adopt the interim corridor boundary, approximately 1/4 mile from each creek bank, as the management boundary for the corridor” (EA, page 13). Of the 23.3 miles of Wilson Creek, 9.9 miles flow through National Forest System lands (EA, page 21). The A map of the corridor is located in the EA on page 4.

Comment 3-2

“The EA does not explain what plant and animal species specifically reside in these forests, what are the species indicators used by the USFS for these forests and how will this new management plan for Wilson creek impact these forested areas. What are the direct, indirect and cumulative impacts of the project to the forested areas?”

Agency Response

The description of the “Fish and Wildlife” and “Botanical” Outstandingly Remarkable Values is located in the EA, page 23. Chapter IV of the EA addresses the consequences of the alternatives, including direct, indirect and cumulative effects. “Since all elements of the alternatives are entirely programmatic in nature, no adverse effects on biological or archeological resources would result from incorporation of the CRMP in the Forest Land and Resource Management Plan. Future actions would require appropriate NEPA documentation” (EA, page 5).

Comment 3-3

“The EA does not give specific guidelines that will be used for vegetation management within the forested areas.”

Agency Response

Alternative 2, provides the General Direction and Standards for Vegetation Management (EA, pages 17 and 18). These directions and standards shown in “this management area are only those additional to or more specific than forest-wide direction, MA 15, MA 18, and/or MA 6. Refer to forest-wide direction, MA 15, MA 18, or MA 6 for all activities and practices not addressed here” (EA, page 14, header).

Comment 3-4

“The EA does not give site-specific examples about the types of noxious weeds and invasive exotic plant and animal species that are currently present in the forested corridors. The EA does not give site-specific information about the types of noxious weeds and invasive exotics that are currently present in the surrounding areas and pose a potential threat to the uninfested forested corridors.”

Agency Response

All elements of the alternatives are entirely programmatic in nature. Future actions would require appropriate NEPA documentation, including site-specific examples. (EA, page 5). The directions and standards shown in “this management area are only those additional to or more specific than forest-wide direction, MA 15, MA 18, and/or MA 6. Refer to forest-wide direction, MA 15, MA 18, or MA 6 for all activities and practices not addressed here” (EA, page 14, header).

Comment 3-5

“The EA does not give site specific information about the types of biologically infested trees that are currently within the forested areas and what specific management plans will be used to treat these infested trees. The EA does not give site-specific information about the types of biologically infested trees that are currently outside of the forested corridors and if they pose a threat to the Wilson Creek forests.”

Agency Response

See Agency Response to Comment 3-4.

Comment 3-6

“The EA must disclose what specific guidelines will be used to manage salvage operations within the forested corridors. How will the USFS decide whether a salvage operation is appropriate and what template will they use? What types of machinery would be used for a salvage operation and what possible impacts would this have on the forest ecosystems? Under what circumstances would salvage operations be necessary? The EA does not address any of these issues and this is unacceptable due to the environmental impacts salvage logging can have on an area.”

Agency Response

See Agency Response to Comment 3-4.

Comment 3-7

“SABP is concerned that this special uses section does not discuss the impacts that these numbers could possibly have on the biodiversity of the river and the health of the entire area. We believe that the impacts of the total amount of people allowed on the river could adversely affect the health and integrity of the river. We specifically request a thorough analysis of what impacts these boats will have on the river, how will these boats dispose of their waste products? Where will the boaters excrete their biological wastes and how will this effect the composition of the river ecosystem? Where will designated pull-off areas be located? We believe that a complete impact assessment for the special uses provision within this Environmental Assessment is necessary prior to the implementation of this plan.”

Agency Response

The direct, indirect and cumulative effects on the Outstandingly Remarkable Values are presented in Chapter IV of the EA. The “ecological factor” was considered when evaluating recreational carrying capacity. This includes “any components of the ecosystem that may be negatively effected by recreational use (EA, page 48). Also, see agency response to Comment 3-5.

Comment 3-8

“SABP is concerned that there has been insufficient information and analysis given for how this plan will monitor long-term trends and the effectiveness of specific actions. For instance what specific indicators will be used for various river values and established and acceptable threshold levels? On page 16 of the

Environmental Assessment under Wildlife and Fish Resource Management there is no section that describes how these management regimes will be monitored. The lack of monitoring programs is unacceptable for this Environmental Assessment.”

Agency Response

Chapter V of the CRMP, page 25, outlines monitoring that will occur in order to determine the extent to which the plan is being implemented, to understand how management of the river corridor is affecting Outstanding Remarkable Values, and to identify conditions needing corrective actions to protect and enhance river values.

Comment 3-9

“Please explain more thoroughly in section 1 on page 16 under Wildlife and Fish Resource Management how this plan will manage streams for self-sustaining fish populations where conditions are favorable? How will you define favorable conditions and in what areas are favorable conditions expected to occur? How exactly will you provide conditions for the large group of game and non-game animals that are dependent on aquatic and riparian systems and how will you monitor for this? How exactly will you emphasize habitat for specific Management Indicator Species, which represent this group, and what Indicator Species will you use? How and why did you decide to specifically use these Indicator Species?”

Agency Response

The Wilson Creek Wild and Scenic River EA is “entirely programmatic in nature...Future actions would require appropriate NEPA documentation” (EA, page 5). Section V of the CRMP, page 25, outlines monitoring that will occur in order to determine the extent to which the plan is being implemented, to understand how management of the river corridor is affecting Outstanding Remarkable Values, and to identify conditions needing corrective actions to protect and enhance river values. The directions and standards shown in “this management area are only those additional to or more specific than forest-wide direction, MA 15, MA 18, and/or MA 6. Refer to forest-wide direction, MA 15, MA 18, or MA 6 for all activities and practices not addressed here” (EA, page 14, header).

Comment 3-10

“On page 16 in section 2 under Wildlife and Fish Management please explain in detail how you will manage streams for wild trout where conditions are favorable and how you will monitor these areas. What wild trout population analyses have currently been conducted and what were the findings. If no wild trout population analyses have been conducted we believe that a thorough analysis of trout populations within Wilson Creek is necessary. What types of wild trout reside in Wilson Creek and where do they reside, specifically in what sections. How will this plan monitor for healthy wild trout conditions? How will this plan promote healthy wild trout habitat?”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-11

“On page 16 in section 3 under Wildlife and Fish Management please explain in detail how this plan will retain suitable cavity trees that are well dispersed throughout the area. How will these trees be monitored and what template for monitoring will be used? What does this plan consider “well dispersed” and how will you promote this habitat? SABP requests a complete inventory of bird species to be listed as well as

possible migratory birds that use this area. Specifically does the Cerulean Warbler inhabit this area and if it does what monitoring/management regimes are being used to protect this endangered species?”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-12

“On page 16 in section 5 under Wildlife and Fish Management please explain in detail exactly how this plan proposes to maintain appropriate stream temperatures and stream environment, and protect stream banks. How exactly will you monitor stream temperatures and stream environments, and the protection of stream banks? What is the appropriate stream temperature and stream environment and are there currently any threats to them? How will the potential increase in recreation affect stream quality? What management treatment will be used to insure the protection of stream banks? For instance will native river plants be planted on unsecured banks to insure that they are not eroded?”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-13

“SABP is enthusiastic that no off-road or off-trail, cross-country travel by bicycles, horses or llamas will be allowed on public lands within the river corridor. We are pleased that the recreational trails will be limited and managed to enhance and protect the forest and river habitats.”

Agency Response

Comment is noted.

Comment 3-14

“On page 15 and 16 under Trails Management there is no section that states exactly where these trails will be built. There is no section that states how many miles of trails are acceptable and the impacts that the use of these trails may have on plant, animal and stream biodiversity. We would like to know exactly/approximately how many people are expected to use these trails during both peak and low seasons and how this will impact soil composition and erosion and plant and animal biodiversity. We believe that this section is too vague and does not properly and thoroughly describe the expected trail network.”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-15

“SABP is also concerned that the Transportation System Management section, located on page 17 of the EA lacks sufficient information about the exact amount of new parking facilities that will be acceptable. We request a complete analysis of possible parking lot facilities. We request that you define in more detail what you find “appropriate” for the amount of new parking. Please explain how you will avoid over-concentration of parking areas within designated parking areas. Please outline a more thorough parking plan that will establish possible alternatives and areas for new parking if they are deemed necessary. SABP requests that more information is given about the locations and types of possible new parking areas

due to the severe lack of information given in the EA. For example, will concrete parking lots be laid and how close to the river will they be? What type(s) of machinery will be used to construct the parking areas? How many parking spaces will be in each parking lot? How many acre(s) of forest will be removed to make way for the parking lots? Although Parking can seem like a minor factor within this EA, impermeable surfaces such as concrete can be very damaging to stream ecosystems due to car pollutants entering the river ecosystem.”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-16

“The EA does not appear to give any specific information about how many new facilities/developments and expansions of existing developments will be expected and or acceptable. What will be the maximum square footage and height in stories that will be allowed or expected for new buildings? On page 15 under Development Recreation Management how will you consider expansion or renovation prior to developing new facilities? What guidelines will you use to assess currently existing buildings? What will make a new development necessary and what types of new developments will be allowed within the river corridor? How close to the river will new buildings/developments be built? Is there a certain buffer that will protect the river from sedimentation run-off? What types of septic systems will be built? Will new plumbing be necessary and where will this take place? How would plumbing overflow effect the river ecosystems and what precautionary management practices are in place to combat this possibility?”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-17

“Under Development Recreation Management in section 3, the EA states that new development will be designed to minimize disturbance of wildlife and move use away from sensitive riparian areas to the extent possible while still providing access to the river at designated locations. The EA does not identify how it will minimize disturbance to wildlife and move use away from sensitive riparian areas. The EA does not describe where the sensitive areas are that would not be acceptable for development. Please define exactly what the EA means when it states that it will minimize disturbance and move use away from sensitive riparian areas to the extent possible.”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-18

“On page 18 the EA briefly explains that the use of herbicides/pesticides would only be allowed after proper environmental analysis has occurred and only those chemicals suitable for the river environment. Please fully explain in significantly more detail what types of chemicals would be suitable for the river environment and how they would be applied. What concentration of herbicides/pesticides would be used? What type of environmental analysis would be conducted and who would be responsible for conducting them?”

The EA does not discuss in any reasonable depth the possible impacts that herbicides and pesticides can have on watersheds and river ecosystems. This is why it is important for the EA to disclose the specific chemicals that it will possibly be using due to the varying harmful effects that different chemicals can have on river wildlife.”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-19

“The EA does not thoroughly address the impacts that the proposed plan will have on the entire watershed area. The EA is extremely vague about impacts to vertebrate and invertebrate species within the river corridor and how increased recreation will possibly affect these organisms. At no point does this EA identify site-specific information that identifies where specific species reside within the river. The EA does not identify where freshwater mussel species reside in the river or how they might be affected from increased recreational uses such as increased boating and angling. The EA does not disclose the locations of seeps, springs, bogs and other sensitive wet areas, and the effects on these areas of the project activities.”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-20

“The EA does not focus on the cumulative effects of this project on the watershed. The EA does not identify the significance of impacts of all past, presently ongoing, and reasonably foreseeable future activities, including those on land within a close proximity of all ownership within the project area. The EA must address this issue in detail due to the fragility of stream and river ecosystems and their susceptibility to corruption from pollution.”

Agency Response

The direct, indirect and cumulative effects on the Outstandingly Remarkable Values are presented in Chapter 4 of the EA.

Comment 3-21

“On page 23 of the EA there are two sections titled Fish and Wildlife and Botanical. These sections do not give any site-specific information on what exact types of plant and animal species are present and where they are located within the planned area. Please identify what types of animal species reside in the planning area and where they reside, their habitats and habitat needs. Please identify how they could possibly be affected or impacted by the increase of recreational uses. Please identify how the plan will classify threatened and endangered species. What analyses have currently been conducted for threatened and endangered species and how were they conducted. The EA must give an in-depth identification of all animal species within the region and where they are located, as well as migratory bird species that might use this watershed.”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-22

“On page 23 under Botanical the EA identifies 20 rare plant species that inhabit this area and 26 natural communities that are present along Wilson Creek. The EA must disclose when and how these species were identified and where they are located. The EA must disclose management plans for providing significant protection for the twenty rare plant species. The EA must disclose what methodology was used when plant taxonomic identification occurred. The EA must be much more specific when referring to plant and animal species, their population densities and expected impacts to their habitats.”

Agency Response

See Agency Response for Comment 3-9.

Comment 3-23

“We are very excited that the project area contains 7,456 acres in two counties. We are also excited that the project plans to manage the corridor as not selected for timber production and that the project emphasizes “enhancement” of Wilson Creek’s Outstandingly Remarkable Values. SABP is enthusiastic that the project will allow no new road construction that would be open to public motorized vehicles as well as placing emphasis on enhancement of values and riparian restoration in the river corridor. We are happy that the project is dedicated to the increase of biological diversity and to the conservation and preservation of this river ecosystem.”

Agency Response

Comment is noted.

Letter 4 – Jeff Stanley, Wahoo Adventures (Mr. Stanley submitted a letter on 4/27/05 with an enclosure of a letter from Mr. Ed Council. On 4/29/05, Mr. Stanley submitted a second letter. The comments from the three letters are presented below.)

Comment 4-1

“The main issue that we have with the CRMP begins on page 20, which limits our trip size to 15 total people including guides. We have in the past years limited our trip size to 22-24 guests + guides, taking into account the narrow and constricted creek bed.”

Agency Response

The Wilson Creek Recreation Carrying Capacity Evaluation states, “Wilson Creek provides outstanding recreation experiences for paddlers, anglers, and other visitors. Because of this, smaller group sizes are being emphasized as a way to protect the high quality experiences and to ensure protection of the Outstandingly Remarkable Values of Wilson Creek” (EA, page 50).

To facilitate maximum safety for commercial river trips, the group size limit of 15 persons will apply only to customers on the trip. Guides will not be counted within the limit of 15 persons for commercial recreational trips or 5 persons for commercial instructional trips. This will give permitted outfitters the flexibility of the providing guides as necessary for each trip. Also, time windows for commercial trip launches will be specified as appropriate in outfitter permits to reduce potential use conflicts as much as possible and to give outfitters flexibility in trip logistics.

Comment 4-2

“In addition our training program for the Wilson Creek gorge is very in depth and extensive, often times it will take a guide several seasons to ‘check out’ and most of our training occurs during actual trips

where we can instruct under ‘real world’ scenarios. We currently use at least 3 guides on all trips to cover all the major rapids and maintain the highest level of safety for our clients. By potentially limiting trip totals to 15 including guides, we would be forced to maintain a guide ratio of 1 to 4, which would be cost prohibitive for us, unless we raised the cost of the trip for each participant, which in turn would drive the consumer costs up to the point that the trip would become unaffordable for the majority of the groups that we market our Wilson Creek trips to.”

Agency Response

See response to 4-1.

Comment 4-3

“We feel that in areas of potential user conflict, one trip of up to 25 will have less of an impact on other forest users than two trips of 15. The day use section of the Wilson Creek gorge, has limited parking area at river access points, and on a trip of up to 25 we use the same amount of parking as we would with a trip of 15. On the weekends, when river and fishing traffic are at their peaks, we typically are on the water in the late morning and take out in early afternoon, times when fisherman and private boaters are not nearly as prevalent as earlier or later in the day.”

Agency Response

See Agency Response to Comments 3-9 and 4-1.

Comment 4-4 (from letter attached from Ed Council)

“First safety: my understanding is that a reason cited for limiting boaters is that the eddies would be filled up leaving no place for a boater in need to respite. My observations are that the eddies are insufficient to provide safety to the paddling public alone.”

Agency Response

Comment is noted.

Comment 4-5 (from letter attached from Ed Council)

“To limit group size to 16 separates most groups that my 24-year career has seen on similar excursions: schools, churches, management teams, our own PPA experience referenced above are examples. Bonding is a major benefit for groups to experience the outdoors. Therefore, I cannot fathom that increasing the current size by 10 would have a negative safety or environmental impact, the latter of which is the USFS responsibility.”

Agency Response

Comment is noted.

Comment 4-6 (from letter attached from Ed Council)

“The last conference on this subject I attended in Snow Mass, Colorado concluded that artificial and even arbitrary numerical limits is a poor substitute to assessing the individual site being considered for maintaining or upgrading safety, experiential and environmental issues.”

Agency Response

See Agency Response to Comment 4-1.

Comment 4-7 (from additional comments submitted by J. Stanley)

“If more Commercial Outfitters with groups of 5 and less are doing instructional clinics on the Creek it will significantly add to congestion and traffic through the Gorge...A commercial instructional kayak or inflatable kayak trip on the water will inherently move at a much slower pace causing additional bottlenecks at all the major rapids and narrow passageways.

Agency Response

Section V of the CRMP, page 25, outlines monitoring that will occur in order to determine the extent to which the plan is being implemented, to understand how management of the river corridor is affecting Outstanding Remarkable Values, and to identify conditions needing corrective actions to protect and enhance river values.

Letter 5 - Kevin Colburn, American Whitewater

Comment 5-1

“Congratulations on developing a great plan, it was refreshing to read and was put together well.”

Agency Response

Comment is noted.

Comment 5-2

“The only thing that I noticed which we have talked about is the need for some Leave No Trace – Don’t [sic] Litter educational and interpretation efforts up there, yet the educational goals are stated as focussing [sic] on habitat.”

Agency Response

The CRMP General Direction for “Interpretation and Education” will be edited to include Leave No Trace. (EA, page 17 and CRMP, page 19)

Comment 5-3

“Also anything that could be done to protect the tributaries from logging would be great too.”

Agency Response

Comment is noted.

Letter 6: Bob Hathcock, NOC (oral comments)

Comment 6-1

They wouldn’t mind having a little larger group size for instruction, but the 5-person group size limit is workable for them on Wilson Creek since it is a constricted creek corridor – if they had a larger group, they would split it. They only plan to have advanced students on Wilson Creek.

Agency Response

Comment is noted.

Letter 7: Bambi Teague, National Park Service

Comment 7-1

“We concur with alternative 2, and offer several minor suggestions for clarification and consideration in the document on the attached comment sheets. We are excited about the designation of Wilson Creek as a National [Wild] and Scenic River and look forward to working with you in the management of this river.”

Agency Response

Comment is noted.

Comment 7-2

“Page 4: Scenic Segment: The draft General Management Plan for the Parkway designates the Wilson Creek section as “Special Natural Resource” which should be compatible with the WSR designation of scenic.”

Agency Response

Comment is noted.

Comment 7-3

“Page 8: Issue 2: Determining Types and Distribution of Recreational Opportunities: The Parkway has had an initial conversation with the Forest Service about rerouting a portion of the Tanawha Trail in the vicinity of Wilson Creek onto Forest Service lands, as long as there are not issues that surface. The language in your document seems to support such a decision, should it be formally proposed. We just wanted to be sure you were aware of this possibility.”

Agency Response

See Agency Response for Comment 1-3.

Comment 7-4

“Page 8 and 28: Issue 3: Commercial Use: The Parkway issues a number of special event permits and Incidental Business Permits (group use) for use of the Grandfather corridor, for such activities as rock climbing and bike races. It would be helpful if this document made a statement to this effect, or a statement that this designation would not preclude such activities on the Parkway.”

Agency Response

The CRMP on page 11 states, “The National Park Service manages a 0.6 mile section of the Blue Ridge Parkway in the Scenic segment of the Wilson Creek corridor. Management direction for this portion of the corridor is contained in the General Management Plan for the Blue Ridge Parkway and is compatible with the goals of the CRMP.”

Comment 7-5

“Page 17: Wildlife and Fish RM: BLRI would prefer to see an emphasis on native species rather than on both native and non-native. Is management focused on raccoons and pileated woodpeckers because they are ‘indicator species’? Would like to see Allegheny Woodrats mentioned since they occur in this corridor, and some consideration for neotropical migratory birds.”

Agency Response

In the Land and Resource Management Plan for the Nantahala and Pisgah National Forests, MA 18 has a standard under Wildlife and Fish Resource Management that states, "Manage habitat primarily for raccoon, pileated woodpecker, trout, and smallmouth bass." Raccoon and pileated woodpecker are both native species in the area. The EA does not mention an emphasis on non-native wildlife versus native wildlife species, but it does mention that conditions should be provided for a large group of game and non-game wildlife that are dependent on aquatic and riparian systems. Management is not necessarily focused on raccoon or pileated woodpecker, per se; however, these species are supposed to represent the habitat around Wilson Creek. Other riparian management indicator species include mink and Blue Ridge two-lined salamander, as well as raccoon. If a specific project is proposed within the Wilson Creek corridor, the effects of the project on all federally threatened and endangered, regionally sensitive, and locally rare wildlife species must be considered. Woodrats and several neotropical migratory birds are included in this group.

Comment 7-6

"Page 18: Wildfire Management: Under standards, include a mention that retardant and other fire chemicals will not be used adjacent to or on water resources."

Agency Response

Comment is noted.

Comment 7-7

"Page 19: Vegetation Management: It is appropriate that this designation will not be considered for timber production."

Agency Response

Comment is noted.

Comment 7-8

"Page 27: Fisheries Resources: Are there any native trout in this creek? Most brook trout research, I believe is showing native southern brook trout on the west side but not on the east."

Agency Response

There are wild trout (self-sustaining) trout populations within the headwaters of the Wilson Creek. All three trout species are present within the corridor - brook, brown, and rainbow trout. While brook trout (southern strain) are the "true native" trout in North Carolina, there has not been enough genetic analysis to determine if brook trout are indeed native to southeastern Atlantic slope streams, including Wilson Creek and its tributaries. We hope to answer this question cooperatively with the North Carolina Wildlife Resources Commission as one of our next steps in the preservation and conservation of brook trout in North Carolina. Lower portions of Wilson Creek are managed under hatchery supported fishing regulations, which means that the trout population is augmented with catchable size (>7") trout of all three species. None of these trout are native to North Carolina-- they are stocked to provide angling opportunities in areas where habitat or other parameters are limiting (including summer water temperatures, which is the limiting factor in the distribution of trout within the Wilson Creek corridor).

Comment 7-9

“Page 31: Alternative 2, Direct and Indirect Effects: Would exotic vegetation control be prioritized for riparian areas and buffers to keep them pristine; would herbicides be considered/allowed?”

Agency Response

See Agency Response to Comment 3-4.

Letter 8: Bob Stapleton

Comment 8-1

“Designated put-in and take-out points for both Gorge and upper recreational section, beginning at the 1328 concrete bridge below Mortimer, take-out for this section same as Gorge put-in, with Gorge take-out in the vicinity of Brown Mountain Beach. Some sort of check-in system, similar to the Chattooga, should be implemented.”

Agency Response

Comment is noted.

Comment 8-2

“There should be no camping within the corridor from the bridge where 928 intersects 1328 to the head of the Gorge. This area in the past has been the scene of drug use, drunkenness, and a whole lot of littering. Ideally, the only camping in the corridor would be at Mortimer, Brown Mountain Beach, and, if Caldwell County acquires it, Deerhorn Park.”

Agency Response

The General Direction for “Dispersed Recreation Management” allows “primitive camping at designated areas only” (EA, page 14).

Comment 8-3

“Not sure that mountain bikes or horses should be allowed on trails subject to erosion problems. Have observed equine damage on narrow steep trails.”

Agency Response

Comment is noted.

Comment 8-4

“Agree that Alternative 2 is preferred.”

Agency Response

Comment is noted.

Comment 8-5

“Agree that commercial outfitters be restricted to only two with a max of 15 people per group. Perhaps a restriction on the number of watercraft would also be feasible due to the short Gorge run, narrow stream, and smaller eddies.”

Agency Response

Comment is noted. Also, see Agency Response to Comment 1-4.

Letter 9 thru 159: Form Letter Generated by the Blue Ridge Horseman's Association
(Individual letters are included in the project record.)

Comment 8 thru 158-1

“As a frequent user of the Wilson Creek area and member of the Blue Ridge Horseman’s Association, I strongly agree that alternative 2 would be the best plan for this area .”

Agency Response

Comment is noted.