



File Code: 2350

Date: June 9, 2008

Dear Interested Parties:

I am seeking comments on a proposal to implement a series of road and trail modifications and other management actions for the Upper Tellico Off-Highway Vehicle Road and Trail System (hereafter, the OHV System). The intent would be to greatly reduce the amount of soil leaving the road and trail system and entering the Tellico River and its tributaries as well as provide an OHV trail system. This outcome depends on three categories of activities: modifying the current road and trail system so that it can be maintained in the future without extraordinary maintenance costs; an intense period of initial heavy maintenance and some rerouting to fix existing problems; and managing the conditions of OHV use so as to reduce the potential for future soil loss.

This proposal is a starting point for discussion among people with an interest in and knowledge of the Upper Tellico area. We expect many other ideas to surface and alternatives to this proposal will certainly be considered.

The OHV System is located in Cherokee County North Carolina, about 13 miles north of Murphy. The 39.5 miles of existing roads and trails that comprise the system are concentrated within an area approximately 6,000 acres in size. The area borders Monroe County, Tennessee, and the OHV System is accessible from both states.

## **Proposed Action**

### **MODIFYING THE OHV SYSTEM AND MANAGING ITS USE**

The proposed action would reduce the trail system from its current 39.5 miles (all mileage figures are approximate) to 24 miles and would implement use-management techniques including seasonal and wet weather closures to reduce damage to the trail surfaces and thereby reduce sedimentation potential and long term maintenance costs. Over five miles of the 15.5 mile reduction in the proposed system are simply due to a status change to what is now known as Trail 1 (a.k.a. Davis Creek Rd. or Tipton Creek Rd.). It would be improved to become suitable only for street-legal vehicles. Another three miles of the length reduction is due to a status change for Trail 2 (see details below). Other proposed changes: Trails 9 and 12 would be closed completely; Trails 3, 4, 5, 6, 7, 8, and 10 would remain open at least in part; Trails 10A and 11 would stay on the system conditionally, to be re-evaluated in two years.

Many of the trail segments that are popular for high-challenge rock-crawler opportunities are heavily eroded, have high potential for contributing sediment to nearby streams, and are therefore proposed for closure and rehabilitation.



This proposed action would require amending standards in the Nantahala and Pisgah Land and Resource Management Plan (the Forest Plan) that specify approximate trail densities and difficulty levels for OHV systems.

**There is a need to stem the flow of sediment from the roads and trails that is entering the Tellico River and its tributaries.**

The Tellico River flows from its headwaters in Cherokee County North Carolina through the area that encompasses the OHV System and on into Tennessee. In April 1994, Cherokee National Forest issued a draft Wild and Scenic River Study that found a 22.8 mile segment of the Tellico River from its headwaters to be eligible and suitable for designation as “recreational” under the Wild and Scenic Rivers Act. The North Carolina Wildlife Resources Commission’s 1991 classification of the North Carolina segment as “Wild Trout Waters” was pivotal to this suitability finding. The self-sustaining wild trout populations, native brook trout in particular, are an “outstandingly remarkable” fishery value as defined by the Wild and Scenic Rivers Act study protocols. USDA Forest Service policy is to manage eligible river segments so as to protect or enhance the outstandingly remarkable values (Bureau of Land Management, 1999).

Sediment, or particles of soil and other material that settle out in streams, is a major concern in forested watersheds in the Southeast (Coats and Miller, 1981). Excess fine sediment in stream systems fills interstitial space between larger rocks and can smother fish eggs and the aquatic insects they feed on. This can also deprive small fish of cover from predators, since their hiding places among the small rocks become filled by sediment. Unpaved dirt and gravel roads and trails can be a primary contributor to stream sedimentation

The Nantahala and Pisgah Land and Resource Management Plan (the Forest Plan) standard for soil and water management states: “Prevent visible sediment from reaching perennial and intermittent stream channels....” Comprehensive condition surveys in November of 2007 and March of 2008 revealed numerous instances of sediment from the OHV System reaching the Tellico River and its tributaries. In many cases the sediment could be visibly tracked either directly entering a waterbody from the road or trail, or through the woods to a waterbody or to another trail that transported the sediment to water. For most sections of the trail system the potential for stream sedimentation could be greatly reduced with additional drainage features and standard engineering techniques such as: construction of rolling dips and silt traps; proper location and installation of appropriately sized culverts; occasional large stone added to trail surfaces; and frequent maintenance. Some sections of trail, such as deeply entrenched sections, would be more difficult to fix.

Deeply entrenched areas of trail can be responsible for transporting an inordinate amount of sediment. When it rains, these entrenched areas act like chutes funneling runoff. The runoff may gain speed and pick up whatever loose soil it encounters. This fast flowing water ruts the trails and scours banks, thus exposing more soil to eventually becoming sediment in streams. It is virtually impossible to remove the water from deeply

entrenched trail sections using standard road and trail engineering or drainage structures. If the trail becomes worn down to bedrock it may also expose springs that add to water flow and thus the potential sedimentation issues. Several trail sections on the OHV System exhibit this deeply entrenched condition, making it difficult to manage the runoff without closure and rehabilitation. With a loop system such as in the Upper Tellico, if a reroute or bypass of a closed area is not feasible from an engineering and cost perspective, the entire trail may have to be closed.

**Following are trail-specific findings from the condition surveys along with my proposal based on these findings.**

CONDITION SURVEY FINDINGS	PROPOSED ACTION
<b>Trail 1 – Tipton Creek</b>	
<p>The switchbacks (survey stations 6,400 ft. through 8,000 ft.) cannot be maintained adequately as an aggregate surfaced road. Repeated reconstruction has failed to resolve the issues associated with the steep grade. The switchbacks make it very difficult for ordinary vehicles to traverse the road and nearly impossible for vehicles with trailers. Stretches are in close proximity to Tipton Creek. With the high traffic volumes and unauthorized high speeds, along with wheels spinning to gain traction through the switchbacks, Trail 1 is a potentially high sediment source. Hardening the road surface such as with pavement would alleviate much of this potential. The drawback, however, is that ATVs are not compatible with paved surfaces. So an alternate way for ATVs to access the system from State Line parking area would be required.</p>	<p>Harden road surface with pavement or other appropriate surface material to eliminate sedimentation potential and reduce maintenance needs. Add trail system access for ATVs at the northern entrance near the NC-TN state line (if Trail 1 is paved ATV's could not use it to access the system). Remove Trail 1 from the OHV System but retain as an open through-road from North Carolina into Tennessee for street-legal vehicles.</p>
<b>Trail 2 – Tipton Knob</b>	
<p>The section from its northern intersection with Trail 1 for about 3/5ths of a mile is all draining into the adjacent Jenks Branch. It would require extraordinary engineering design at high cost to fix this, since it involves the area known as the Rock Garden, and the cost of long term maintenance of such extreme installations is unknown. The remainder of the trail is in poor condition and has some deeply entrenched areas but is less of a potential sediment source due to its location on a ridgeline. While it would be expensive to repair and maintain for continued</p>	<p>Remove from OHV system. Close and rehabilitate the segment north of intersection with FS-402 (known as the Rock Garden). Add remainder of Trail 2 (from intersection of FS-402 south to Harshaw Gap) to forest road system. Gate at Harshaw Gap and Jenks Gap (this section would be available only for administrative use and landowner access to private inholdings.) The section from Jenks Gap to FS-402 would be open to street legal vehicles and would be maintained for high clearance vehicles from FS-402 to FS-24.</p>

<b>CONDITION SURVEY FINDINGS</b>	<b>PROPOSED ACTION</b>
OHV traffic, this segment accesses private property so it would need to remain available for the use of the private landowners.	
<b>Trail 3 - Bearpen</b>	
Though part of this trail runs parallel to a Tellico River tributary, the condition of the trail would allow routine engineering and heavy maintenance to alleviate the sedimentation potential. Scouting of possible reroute locations found them more problematic than the trail's present location. Part of the sedimentation potential is actually the result of sediment coming from Trail 12. Reducing or eliminating soil loss from Trail 12 would address this.	Retain as part of the OHV System. Perform heavy maintenance including installation of additional drainage structures.
<b>Trail 4 – Fain Ford</b>	
A stretch of Trail 4 runs parallel to Peckerwood Creek, and condition surveys located numerous instances where sediment could be seen entering the creek. Within this stretch, another location exhibits fill-slope failure and has landslide potential. Fixing this segment would be very expensive with limited potential for long term success. The remainder of Trail 4 is fixable with normal engineering and heavy maintenance.	Retain as part of the OHV System from southern access point to intersection with Trail 8 at Fain Ford. Close and rehabilitate section north of this intersection with Trail 8, to the intersection with Trails 6 and 7. [The previous decision to construct a bridge across the Tellico River at Fain Ford would go forward.]
<b>Trail 5 – Tellico River</b>	
Two areas of high-sediment-potential exist near the intersection with Trail 4, as sediment is accumulating from a “trail stacking “ situation where Trail 12 is dumping sediment onto Trail 4 and then running along with additional Trail 4 sediment down to Trail 5 and into the Tellico River. There is also a series of springs in this area adding to the runoff.	Retain as part of the OHV System with a reroute to a new intersection with Trail 4. This reroute of approximately 3,500 feet would use an existing old road template. Close and rehabilitate a section that currently intersects with Trail 4.  [Also see Trail 12 proposal]
<b>Trail 6 – State Line Loop</b>	
One short stretch is a major sediment source for this trail. Installation of oversized culverts on this stretch along with heavy maintenance of the whole trail would alleviate much of the sedimentation potential.	Retain as part of the OHV System. Install several oversize culverts at a bad stretch of trail (between surveyed stations 3,458 ft. through 6,888 ft.).  A new connector would be constructed off

CONDITION SURVEY FINDINGS	PROPOSED ACTION
	Trail 6 from State Line parking area to Trail 5 to facilitate access to trail system by non-street-legal vehicles. This new access would take this traffic off Trail 1.
<b>Trail 7 – Peckerwood Connector</b>	
<p>Not only sediment but other contaminants associated with motor vehicles are making their way into Peckerwood Creek from the “challenge” area on Trail 7. Stabilizing this trail segment would require extraordinary engineering design and be very expensive. Follow-up maintenance requirements would be unknown.</p>	<p>Retain as part of the OHV System from intersection with Trail 6 to a point in the vicinity of Peckerwood Creek. Construct a reroute of approximately 1,500 feet from this point to Trail 8 to bypass the “high challenge” area. The proposed reroute follows an existing old road bed for 900 feet, leaving 600 feet of new construction. Close and rehabilitate the trail east of the reroute, including the “high challenge” area.</p>
<b>Trail 8 – Bob Creek</b>	
<p>This first 1.5 miles runs parallel to the Tellico River and it is evident that the adjacent tributaries do at times overtop the trail and even turn the trail itself into a stream of sorts. In addition, three bridges are rotted out, an old wooden culvert needs replacing, and a new bridge is needed at one point on the trail. For the most part these problems could be fixed with the installation of about a dozen oversize culverts, four or five new bridges, and a shift in the road surface upward. Fixing Trail 8 would entail more cost than most of the other trail work but it is a major loop in the system. The fixes are within the scope of normal engineering and heavy maintenance.</p> <p>The short piece of Trail 8 that runs south from the Trail 7 intersection contains a stretch worn down to bedrock that can funnel water down to Trail 4 and then straight into the Tellico River. Attempts to find a suitable reroute location were unsuccessful.</p>	<p>Retain in part and close in part. Keep the trail open from its intersection with Trail 4 at Fain Ford eastward, making a counterclockwise loop to its intersection with the Trail 7 reroute. Close the short section south of its intersection with the Trail 7 reroute. Trail 8 would require heavy maintenance, some reconstruction and possible minor rerouting. Due to proximity to the Tellico River this would include minor road shifts away from the stream course and to minimize the entrenchment. Some hardening of the roadway with rip-rap would also occur. Construct four to five bridges and install numerous large culverts along with other standard drainage features. Restore Mistletoe Creek into its original channel.</p>
<b>Trail 9 – Mistletoe Connector</b>	
<p>Steep grades, areas of deep entrenchment mixed with numerous springs coming out of the bedrock area and close proximity to streams make Trail 9 among the most difficult and</p>	<p>Remove from the OHV System. Close and rehabilitate.</p>

CONDITION SURVEY FINDINGS	PROPOSED ACTION
expensive to repair.	
<b>Trail 10 (ATV Only) – Round Mountain</b>	
<p>Condition surveys identified three especially problematic areas on this ATV-only trail. The first, at the northern end of Trail 10, is a steep, deeply entrenched stretch of about 800 feet that is dumping onto Trail 8 and rapidly filling a sediment trap there. The second is a stretch of about 500 feet where the stream is actually running in the trail. The third is at the “challenge area” where extensive soil movement has occurred immediately adjacent to the creek. Possible trail relocations were scouted but were not deemed suitable. The main trail has deteriorated to where users have created bypasses on poor locations. From an engineering perspective any fixes would be difficult to maintain in part due to the high-impact ATV traffic.</p>	<p>Retain segment from intersection with Trail 10A west to intersection with Trail 3 (the southernmost section). Remove the remainder from the ATV system; close and rehabilitate.</p>
<b>Trail 10A (ATV Only) Round Mountain Spur</b>	
<p>While this trail parallels the Tellico River for the majority of its length, good grades and lack of entrenchment make it a good candidate for engineering fixes to the drainage features and initial heavy maintenance.</p>	<p>Retain open to ATVs with reevaluation at the end of two years. Reevaluation would result in continuation of open status or closure depending on effectiveness of drainage features in stemming sediment flow into the Tellico River.</p>
<b>Trail 11 – Chestnut Mountain</b>	
<p>While there are some steep, rocky areas and some entrenchment and exposed bedrock, the trail is far from water and condition surveys did not track sediment reaching water. However there are three “challenge areas” that not many users can traverse, thus limiting the capability of the trail to be used by ATVs and others looking for a ride of moderate difficulty. Bypasses around the challenge areas could make the trail more useable if suitable locations are found.</p>	<p>Retain as part of the OHV System contingent on successful construction of challenge area bypasses. If bypasses are not successful, close trail and rehabilitate.</p>
<b>Trail 12 – Hawk Knob</b>	
<p>Trail 12 begins with a long stretch of deep entrenchment followed by exposed bedrock.</p>	<p>Remove from the OHV System. Close and rehabilitate.</p>

CONDITION SURVEY FINDINGS	PROPOSED ACTION
<p>The trail is visibly broadcasting sediment-laden runoff through the woods down to Trail 3, across this trail down to Trail 4 and then Trail 5, ending up in the Tellico River. The steep mud chute, unstable side-walls with undermined trees and root-wads, narrow entrenched sections, and high terraced bedrock ledges make Trail 12 a poor candidate for normal engineering fixes. Terrain features limit possible reroutes.</p>	

**There is a need to manage the use of the road and trail system to limit stream sedimentation well into the future.**

When and how OHVs use the system can influence the potential for erosive runoff to reach the Tellico River and its tributaries. Vehicles on trails after rain events will churn up more mud than vehicular traffic during dry times. Similarly, traffic during the winter period of freezing and thawing of the road surface can increase sedimentation potential and damage the trail surface. Two-wheel-drive use of the system can churn up soil when tires spin to gain traction. Eliminating wet weather use, winter use, and two-wheel-drive use would hopefully allow the system to stay in acceptable condition much longer than is currently the case, thus reducing annual maintenance costs from what they would be otherwise.

**Following are the proposed actions to manage OHV use:**

1. Seasonal closure of the entire OHV System from January 1 through March 31 each year.
2. Short term closures as necessary following high rainfall events.
3. To facilitate temporary closures, camping adjacent to the trail system would be eliminated.
4. OHVs (other than vehicles with two wheels) must have 4-wheel drive locked in.  
[Motorcycle and dirt bike use remains the same as now.]

**AMENDING THE FOREST PLAN**

Currently, the Forest Plan standards for OHV trail “levels of challenge” and “miles per square mile” (trail density) are inconsistent with both the existing trail system and the proposed trail system. To remedy this inconsistency, the proposed action would change the Forest Plan language as follows:

<b>Current Forest Plan Language</b>	<b>New Forest Plan Language</b>
Pg. III-11: a. Designate routes that will: - provide easy to moderate levels of challenge;...”	Pg. III-11: a. Designate routes that will: - provide “ <b>various levels of challenge:</b> ”
Pg. III-59: 2. Provide opportunities in response to identified needs to an approximate density of 2 miles per square mile in any management area unit.	REMOVE LANGUAGE
Pg. III-67: 2. Provide opportunities in response to identified needs to an approximate density of 2 miles per square mile in any management area unit.	REMOVE LANGUAGE

### **Need For Amending the Forest Plan**

Changing the language in regard to challenge level: The degree of challenge provided by any OHV trail is extremely subjective according to the type of equipment and skill of the user. Therefore, the phrase “various levels of challenge” is more accurate than the phrase “easy to moderate levels of challenge” when describing the opportunity the Forest Plan intends.

Removing the OHV opportunity density standard: The current Upper Tellico OHV System trail densities are approximately 4.2 miles of trail per square mile for most of the area. The proposed action would reduce those densities to approximately 2.8 miles per square mile. This still exceeds the Forest Plan standard of approximately 2 miles per square mile. By removing the density standard we can tailor the density for a given trail system to a wide variety of site-specific resource- and user-related variables, such as habitat for particular species, proximity to water, topography, vehicle types and seasonality of use. A standard density is not an established measure of trail system success either regionally or nationally. The proposed Forest Plan change would achieve greater consistency with national guidance on OHV trail system management.

### **Decision Criteria**

As we proceed with analysis of the environmental impacts of the proposed action and any alternatives, two criteria will be especially important in deciding on a course of action:

**1. The road and trail system cannot continue to contribute additional visible sediment to the Tellico River and its Tributaries.**

We have an obligation to meet the Forest Plan soil and water standard which is derived from North Carolina Forest Practices Guidelines Related to Water Quality. I will be weighing each alternative in light of how likely it is to meet the “no visible sediment...” standard.

**2. The road and trail system cannot repeatedly incur excessive maintenance and reconstruction costs.**

A multi-billion dollar nationwide road and trail maintenance backlog on National Forest System lands has been recognized by the Federal Office of Management and Budget ([www.whitehouse.gov/omb](http://www.whitehouse.gov/omb)). The future of the OHV System depends on whether or not it can be maintained with available resources – both money and people to do the work.

As it exists today, the OHV System cannot be maintained adequately so as to limit future sedimentation. The money and people available to do the maintenance are severely limited. While current user fees and volunteer efforts make an important contribution, they do not meet the current or projected need. The resources to do the work must increase dramatically, the long term maintenance requirements must decrease dramatically, or some combination of both must occur to financially maintain the Upper Tellico OHV System. I will be weighing each alternative OHV system in light of how likely it is that we will be able to maintain it in future years.

### **I Welcome Your Comments**

An interdisciplinary team of Forest Service specialists will complete an Environmental Assessment over the summer. This assessment will analyze the ecological, social, and economic impacts of a proposed action as well as some alternative management schemes we will develop with your input.

I know many of you have intimate knowledge of the area and ideas for making changes and improvements. I look forward to hearing from you. Please make your comments as specific as possible along with supporting reasons why you believe your comments should be considered. Please include your name and address in any correspondence.

Your comments may be sent to Tusquitee District Ranger, 123 Woodland Drive, Murphy, NC 28906. Comments may also be sent via email to [comments-southern-north-carolina-nantahala-tusquitee@fs.fed.us](mailto:comments-southern-north-carolina-nantahala-tusquitee@fs.fed.us). We would appreciate receiving your comments by July 9, 2008.

We will be hosting an open house from 1:00 PM to 4:00 PM on June 28, 2008 at the First Baptist Church in Murphy, NC. See the enclosed announcement for details.

Thank you for your time and interest in our management activities on the Tusquitee Ranger District.

Sincerely,

*/s/ Steve Lohr*

STEVE LOHR  
District Ranger  
Cheoah/Tusquitee Ranger Districts