



www.americanwhitewater.org

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Re: Nantahala and Pisgah National Forest Planning

Dear Forest Service Planning Staff,

American Whitewater would like to thank USFS staff for the opportunity to provide these comments on the assessment-phase of this new Forest planning process. American Whitewater is a national non-profit organization dedicated to conserving and restoring our country's whitewater resources, and to enhancing opportunities to enjoy them safely. We have over 5,500 members - typically non-commercial kayakers, rafters, and canoeists – many of whom regularly paddle rivers flowing through the Forests. In addition we are partners in managing several rivers on the Forests where we have invested significant effort into flow restoration and/or management. We look forward to working with the Forest Service and the public in developing protective and nationally consistent management plans for the Forests.

Canoeing, kayaking and rafting are likely the oldest forms of travel and exploration aside from walking. Though technological advances have improved safety (as in all outdoor recreation) the core elements of the activity remain; exploring natural areas by paddling a small boat through the landscape on rivers. Each river is a natural trail through the landscape, reflecting the character of the geology and natural beauty. Paddling is human-powered, place-based, low-impact, quiet, non-consumptive, skill-based, and Wilderness-compliant. In short, it is exactly the kind of activity and experience covered under the definition of "sustainable recreation" in the new Forest Planning Rule.

As we understand the assessment phase of the new Forest Planning process, you are now seeking pre-existing information that can help form the factual basis for the remainder of the planning process, as well as some high-level comments on topics we would like the plan to cover. Our comments seek to provide exactly this type of information and context.

1. Whitewater Paddling Across the Forests and Region

The mountains of Western North Carolina have played a prominent role in the development of modern whitewater paddling, especially creek boating. Today, the region is not only a sought after destination for paddlers from across the globe, but also a home for many paddlers. Many paddlers cut their teeth at a summer camp in the region, at the Nantahala Outdoor Center, or at one of the regional universities. Regional paddling events draw hundreds or thousands of attendees, paddling related businesses

like Liquid Logic kayaks and Astral Buoyancy have located here, and you can find even paddler-themed restaurants. Paddling has been part of the social and economic fabric of the region for at least half a century, and remains so today more than ever.

Paddling resources exist in the region on Forest Service, Park Service, State, and private lands. The Forests offer paddlers spectacular rivers and scenery with assured legal access. Most rivers in the region are runnable only after significant rainfall, and paddlers on most rivers see few other visitors. In a region of high recreational use, paddling offers people a way of experiencing spectacular seldom-visited areas in relative or total solitude.

The National Whitewater Rivers Inventory offers a relatively comprehensive view of paddling in the region.¹ This Inventory also has a geospatial Google Earth layer associated with it that can be downloaded at the bottom of the above referenced page.² We have also created a Google Earth more specific layer of whitewater rivers on the Nantahala and Pisgah National Forests.³

2. Hydropower's Role in River Recreation on the Forests

The Southern Appalachians have been highly developed for hydropower generation for well over half a century. This development has had significant deleterious effects on aquatic biodiversity and has also had a profound effect on river-based recreation. Many prime whitewater boating opportunities lie beneath reservoirs, and diversions have left some rivers without adequate or predictable flows to support paddling. Over the past 13 years American Whitewater has worked closely with the Forest Service and other regional stakeholders to remedy or enhance flow regimes on several regional rivers. We look forward to a continued partnership on each of these rivers. These rivers have become (or in some cases continued to be) recreational treasures in the region, and we expect the new Forest Plan to seek to support and where possible enhance these recreational opportunities. The rivers we would like the USFS to focus on are:

a. Cheoah River

The Cheoah is a regionally unique 9-mile long Class IV big water river that is deeply valued by the paddling community. American Whitewater, the Forest Service and other partners negotiated a restored flow regime and new access areas for the Cheoah between 2000 and 2005. The first release was celebrated in the fall of 2005, and approximately 18 releases per year have occurred since that time. The ongoing restoration of the Cheoah River is governed by the Federal Energy Regulatory Commission under Project Number 2169.

The US Forest Service, American Whitewater, and our partners negotiated a process for adding additional recreational releases to the Cheoah River when the ecological recovery of the river was deemed to have sufficiently progressed. This process must be

¹ <http://www.americanwhitewater.org/content/River/state-summary/state/NC/>

² <http://www.americanwhitewater.org/content/River/state-summary/state/NC/.kml>

³ <http://www.americanwhitewater.org/content/Document/view/documentid/1152/>

initiated by the federal agencies. We ask that the Forest Service review this process, and integrate it into the Forest Plan as a means of providing for sustainable recreation. Doing so would have significant recreational and economic benefits.

b. Nantahala River

The lower Nantahala River is one of the most heavily rafted rivers in the Nation thanks in large part to flows provided by Duke Energy, access provided by the Forest Service, and various services supplied by Forest Service permitted outfitters. A new license for the Nantahala Hydroelectric Project, under FERC Project Number 2692, institutionalizes the flows. This license is based on a Settlement Agreement signed by both American Whitewater and the Forest Service following a multi-year collaborative process. In addition, the license initiated new releases on the Upper Nantahala in the fall of 2012. These releases, 8 per year, offer paddlers a predictable Class III/IV section (the Upper) and a Class IV+ section (the Cascades) paddling opportunity. To fully take advantage of this recreational opportunity, the Forest Service will be building new river access areas along the Upper Nantahala for paddlers and anglers per the Settlement Agreement. We ask that the Forest planning process support and cover the access improvements planned for the Upper Nantahala.

c. Tuckasegee River

The Tuckasegee River also benefitted from a collaborative dam relicensing process that involved American Whitewater and the Forest Service. The resulting settlement enhanced recreational releases for the Class I-II+ stretches of the Tuckasegee, along with its East Fork which is a popular freestyle paddling resource. New releases began on the river's upper West Fork in the spring of 2013. Numerous access areas, campsites, and other recreational improvements were also part of this relicensing effort. The licenses for the East and West Fork should be reviewed as part of the assessment phase of the Forest planning process (see FERC Project No. 2686 and 2698).

d. Pigeon River

The Pigeon River between Walters Dam and the powerhouse flows through a long and scenic gorge bordering Great Smoky Mountains National Park and boasting miles of Class IV/V rapids. There are currently no scheduled flows in this reach that is fittingly called "the Pigeon River Dries." What could be an outstanding recreational opportunity is instead a dry riverbed. At the time of relicensing (FERC Project Number 432), American Whitewater was not involved and water quality concerns led to a FERC license that supported the dewatering of the river, at least until water quality improved. Water quality has now improved, and the Forest Service is a stakeholder with significant post-licensing rights. The Forest Plan could consider and envision a restored Pigeon River Dries as a means of providing for sustainable recreation.

3. Revisiting Wild and Scenic Eligibility and Suitability

The Forest Planning Rule requires an undated inventory be included as an appendix in all new forest plans. Where past inventories have been completed, new information and/or changed conditions should trigger updates to the inventory. We feel that

recreational and other conditions on the Forest have changed sufficiently to trigger an update.

The Forests currently consider 11 streams eligible for Wild and Scenic designation. These are:

- **Nolichucky River** (now suitable): A classic, scenic, and relatively high volume Class III+ whitewater river that frequently has sufficient flows to support paddling.
- **Wilson Creek** (now designated): A unique and popular Class IV+ whitewater creek run, along with easier upper reaches and more challenging headwater runs.
- **Nantahala River:** Class I/II sections above the reservoir, Class IV+ and III/IV sections in the hydropower diversion reach, and predictably running and high quality Class II+ below the hydro station offer a great diversity that draws hundreds of thousands of paddlers each year.
- **Snowbird Creek:** Snowbird offers one of the most remote whitewater creek runs in the region, as well as a nice lower run that is road accessible. The water quality, scenery, and remote nature of Snowbird make it a unique stream for paddling.
- **Mills River** (North and South Forks): Remote rivers that offer paddlers a route well off the beaten track.
- **Davidson River:** The Davidson offers paddlers a lovely and scenic beginner run, as well as a high quality Class IV upper creek run.
- **Big East Fork Pigeon River** (+Dark and Yellowstone Prongs): The Big East Fork is remote, difficult to catch, and challenging. It offers paddlers up to its challenges one of the most beautiful river trips in the region studded with unique and powerful rapids.
- **Linville River:** Linville Gorge is without equal. It is the longest and among the most challenging whitewater runs in the region, with large and memorable rapids. The river transports paddlers through a geologic and scenic wonder. The river is known worldwide for its challenge and superb experience.
- **Tellico River:** The Tellico offers many paddlers their first taste of vertical whitewater, and boasts an array of Class II, III, and IV paddling opportunities in a beautiful river valley. The rapids are renown nationwide.

Each of these streams provide outstanding and remarkable whitewater recreation opportunities. In addition we would believe at least the following streams are also free-flowing and possess at least one Outstanding Remarkable Value, and should therefore be found eligible for Wild and Scenic designation:

- **Elk River:** The Twisting Falls Section of the Elk offers some of the biggest runnable waterfalls on the Forests in a scenic gorge. The big drops are a highlight of any trip, even if they are just viewed by paddlers walking around them. To the extent the USFS has sufficient land holdings, the Elk is eligible.
- **Gragg Prong:** The Gragg Prong (of Lost Cove Creek) has become a coveted creek run in recent years (since the last eligibility inventory). The run offers paddlers a remote trip through the rhododendron over slides like the nationally

- known “Dragstrip Slide.” As the headwaters of Wilson Creek, the Gragg Prong would make an excellent addition to a protected watershed.
- **Greasy Cove Prong (of the Big East Fork of the Pigeon):** The Forest Service currently finds the Big East Fork of the Pigeon, its Dark Prong, and its Yellowstone Prong eligible. We believe the Greasy Cove Prong, a sizeable and wild stream should also be included in this list.
 - **Lost Cove Creek:** Lost Cove Creek upstream of its confluence with the Gragg Prong offers hikers and paddlers a remote and scenic gorge with sliding waterfalls and deep pools.
 - **North Harper Creek:** North Harper offers paddlers a remote adventure in the classic Wilson Creek Watershed. A big portage keeps use low, but for those that go the opportunities for solitude and adventure are terrific.
 - **West Fork Pigeon River:** The West Fork of the Pigeon is one of the most commonly paddled steep creeks in the Asheville Area. While road accessible, paddlers are transported down a remote-feeling high elevation whitewater run of high quality.
 - **Middle Prong of the Pigeon:** The Middle Prong offers a rare hike-in Wilderness adventure with high quality rapids, old growth, and spectacular scenery in a small streambed.
 - **Little East Fork of the Pigeon:** The Little East Fork offers an exceptional whitewater run in a scenic valley down a section known as “the Bathtubs.”
 - **Flat Laurel Creek:** Flat Laurel is seldom paddled but is a popular hiking destination and its falls are some of the most impressive in the vicinity of the Blue Ridge Parkway. Along with the West Fork of the Pigeon Flat Laurel is an exceptional scenic resource.
 - **Santeetlah Creek:** Santeetlah offers both a great Class III+ run and a challenging classic upper Class V run. Upper Santeetlah is valued by paddlers for its steep and memorable rapids, old growth forest, and pristine water quality.
 - **Thompson River:** The most rugged and challenging of the unique tributaries of Jocassee Reservoir, the Thompson has outstanding scenic values for its slides and falls.
 - **Upper East Fork Tuckasegee:** There is nowhere quite like the Panthertown valley, where streams meander over sandy riverbeds before precipitously tumbling over falls and slides. The Upper East Fork of the Tuckasegee (upstream of Tanassee Reservoir) flows through and from Panthertown Valley and offers paddlers a unique and exemplary Class IV/V river trip over towering slides.
 - **Whitewater River:** The Whitewater River offers scenic waterfalls and spectacular challenging whitewater. Big falls and slides set the whitewater apart from many regional streams, and its remote nature further highlights the value of this wild river.

We request that the Forest Service consult the National Whitewater Rivers Inventory,⁴ the Asheville Area Boating Beta Page,⁵ and North Carolina Rivers and Creeks⁶ to gain a

⁴ <http://www.americanwhitewater.org/content/River/state-summary/state/NC/>

⁵ <http://boatingbeta.com>

⁶ Davis, Leland. North Carolina Rivers and Creeks. Brushy Mountain Publishing. 2005.

better perspective of the recreational opportunity these rivers offer, and update their Wild and Scenic River eligibility inventory based on this new recreational information. We request that the Forest Service not pursue suitability determinations for any streams found eligible at this time. Suitability should be deferred until triggered by a conservation or development proposal, because suitability involves an economic and political snapshot that is irrelevant to the stream's long-term merit for inclusion in the system.

4. Management of Wild and Scenic Rivers on the Forests

The Nantahala National Forest currently maintains unique geographical, seasonal, and water level based prohibitions on paddling the Wild and Scenic Upper Chattooga River in order to avoid "potential conflicts" between paddlers and other visitors.

Year round prohibitions on paddling tributaries to the Upper Chattooga and the Upper Chattooga River itself between Grimshaw's Bridge and Green Creek were previously excluded from NEPA and not analyzed.

These prohibitions on a single form of sustainable recreation are not in keeping with Forest Service policy or mandates under the new planning rule.

All of the prohibitions on the Upper Chattooga were based solely on assumptions about future recreational use, since paddling was totally prohibited during past consideration of the issue, and since other visitors were neither counted nor surveyed. We now have the benefit of data. Results of monitoring being currently conducted, including the permit data from the first winter of restricted boating, should be fully considered in the development of the new plan. It is our experience that paddling use has been much smaller in quantity and impacts than predicted by the Agency prior to having actual data to base decision on.

In addition, paddling prohibitions on the upper 2+ miles of the Upper Chattooga, and the tributaries of the Upper Chattooga have no basis or need, and should be eliminated.

The plan should consider, allow, and implement changes to the management of the upper Chattooga and its tributaries that ease paddling restrictions to be consistent with Agency policy and the new monitoring results.

Thank you for considering these comments,

Sincerely,

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