

Draft
I have inserted my draft suggestions in red, please feel free to make changes/suggestions.
Squeak

Comment Points for Tellico

The Forest Service has requested comments on two proposals under consideration to address water quality problems caused by an off-road vehicle area in the headwaters of the Tellico River, an important brook trout watershed. The proposals, which include temporarily closing 3 miles of the 38 mile trail system and closing the entire trail system in the winter months, are necessary, but they are **not** enough. Trout populations in the Tellico River are in trouble and more substantial action is needed now to prevent a **potential** population crash. Please take a few minutes to submit a comment letter supporting the proposed action, and urging the Forest Service to take more decisive action to address water quality problems by also closing **and rerouting** trail segments within 100 feet of mountain streams.

Comments must be received by the Forest Service on or before October 17, 2007.

Submit comments to:

Tusquitee Ranger District

123 Woodland Drive

Murphy, NC 28906

comments-southern-north-carolina-nantahala-tusquitee@fs.fed.us

Bullet Points for letters:

- The Eastern Brook Trout Joint Venture has identified the headwaters of the Tellico River as the **most significant** intact population of native southern **appalachian** brook trout in western North Carolina.
- Water quality has been declining in the Tellico River and its tributaries for years as a result of muddy runoff from the **inadequately maintained trail system within** the Tellico ORV area. These streams receive **approximately** 500 to 1000 times more sediment than **reference** streams just outside the trail system.
- Because of decades of **overuse and inadequate management**, the trout populations in the Tellico River are crashing. **NCWRC** trout monitoring data confirms that populations in the Tellico River at the base of the ORV trail system are not reproducing successfully. Unless the Forest Service takes substantial action now, this important trout fishery may be lost.
- The current proposal to close trails 7, 9 and lower 2 is necessary and required by law. The Forest Service already has identified these trails as the worst contributors to sediment in the stream. Each of these trails is deeply **entrenched from OHV use** and erosion. **And** best management practices **have proven** ineffective **even when properly maintained**. The current proposal to close them for one year is a necessary start, but will not be sufficient. The only option is to close them permanently and **reroute trails**.

- In addition, the proposal to close the entire system during the rainy winter months is urgently needed and should be finalized in time to take effect this winter. The Tellico ORV area is the only OHV trail system in the National Forests in North Carolina that remains open in the winter months. The Wayehutta ATV system, the Brown Mountain ORV Area and the Uwharrie ORV Area all close in the winter to protect water quality. Winter closure will enable the Forest Service to maximize the effectiveness of its limited maintenance budget for the Tellico ORV trail system. By reducing overall annual usage and eliminating usage in the most damaging months, winter closure will help to **reduce** the significant **water quality degradation and** resource damage caused by **the existing** Tellico ORV system.
- The current **proposals fail to address** a substantial cause of water quality problems in the Tellico River: approximately 6 miles of trail located within 100 feet of mountain trout streams. Like the deep trenches on trails 2, 7 and 9, these trail segments are improperly located such that best management practices, even when maintained, **do not** protect water quality. These trail segments must be closed to ORV traffic now, **be evaluated**, and permanently stabilized or rerouted away from streams.
- These **immediate** closures are necessary to protect water quality and they are required to bring the Forest Service closer into compliance with the requirements of its own forest plan. The current trail system exceeds by 200% the maximum density of trails allowed by the **existing** forest plan. Decades of experience have proven that the Forest Service, **even when assisted by volunteer user groups and significant donated funding, is** unable to maintain **the** 38 mile trail system. The Forest Service must reduce the trail system to a level it can **manage and** maintain. For these reasons, the closures under consideration are needed and must be expanded to include **all** trail segments within 100 feet of streams.