



877 Paul Nicholson Road
Blairsville, GA 30512

Kristin Bail, Forest Supervisor
National Forests in North Carolina
c/o Tusquitee Ranger District
123 Woodland Drive
Murphy, NC 28906

Subject: Laurel Creek Property Owners Association Access-*"Draft Project Environmental Assessment (EA)-October 2014"*

Dear Ms. Kristin Bail,

Please accept the below comments on behalf of the Mountain High Hikers (MHH) Club, Inc. The club maintains a membership of over 200 members from southwestern North Carolina, northern Georgia and eastern Tennessee. We are frequent visitors and users of the Nantahala National Forest and we not only provide two hikes per week for recreational activities, but also maintain, in conjunction with the Forest Service (FS) all the FS trails in the Fires Creek watershed, including Fires Creek Rim Trail (Rim Trail).

Our trail Maintenance Director, Richard Sullivan and other MHH members have spent 30-40 days each year for the last 8 years hiking and maintaining the trails in Fires Creek and are familiar with the terrain, trail conditions, geologic formations, surrounding property, and water sources within the area. We urge the FS to exert all possible administrative and legal means to protect and preserve unspoiled the wonderful natural area that is the Fires Creek basin and surrounding National Forest Lands. We feel strongly that the level and type of access that should be granted to the landowners should be limited to Alternative A-No Easement. This Alternative still provides existing foot and horseback access to the property, thus establishing and maintaining "reasonable access" as noted in the EA document.

Specific comments in regards to the Draft Project EA are listed below:

1. *1.9.2 Similarly Situated Non-Federal Lands:* This section provides details regarding different "access" alternatives as noted in other area properties. As noted in this detailed study-about 1/3 (13) similarly situated properties have NO motorized access and thus rely on trail access only. Of the properties that have vehicular access, most of those have access which are *already established on State or Forest Service roads—no new construction or reconstruction was necessary.* Therefore, these properties do not reflect the term "similarly situated". In addition, only 6 (not 26) of these properties have privately constructed road segments which cross FS lands-so the data actually shows that 13 similarly situated properties out of 19 have NO motorized access.

2. *1.9.4 Scope and Limitations of the LCPOA's Easement Application:* "If access is granted, the LCPOA will be responsible for maintaining existing forest roads...for the duration of the easement." This section should clearly incorporate detailed information in regards to specific maintenance requirements i.e.: What is the duration of the easement? What timeframes are necessary to implement "routine maintenance"? Who would provide overview of the maintenance work? The entire "work-scope" should be included in this document in order to provide the FS with detailed facts in order to base a decision for this project.
3. *2.3.3 Design Measures for Acidic Rock-Alternatives B, C, D:* Perhaps one of the most compelling arguments against new road construction is in regards to the existing Nantahala Formation. There are several portions of the proposed new and existing road construction for the 3 alternatives (B, C, & D) that are in the Nantahala Formation. This technical design discussion does include specific requirements in regards to the reduction of acid run-off, however, it is clear that measures to reduce the acid run-off will not address either short or long-term problems. In particular, during excavation and removal of the acid rock there is discussion in regards to a designated waste area..."then the acid rock must be placed in a designated waste area located in a dry, stable upland are of the project". The inclusion of a designated waste area on FS lands or on LCOPA property is NOT acceptable.
4. *3.1.1.2 Effects on Trails near LCOPA Inholding:* The experience of hikers using the trail system near the LCOPA inholding would change under B, C, & D alternatives. (1) The extent of land clearing on the inholding represents an "unknown" affect to the entire impact discussion. (2) A modest increase in vehicular traffic would become apparent and vehicular noise would be generated throughout the trail areas. There was no discussion regarding the generation of noise from vehicular traffic and road construction in the EA document in regards to the trail users.

We urge the FS to consider the impact of the decision and give full consideration to the natural beauty, wildlife viewing, hiking, and other recreational and educational activities that this beautiful area can provide for generations. In addition, technical considerations in regards to road construction place this project with no other option but Alternative A. Please notify us of future developments regarding this issue.

Sincerely,

Judie Kean
Conservation Director, MHH, Inc.

C: Michael O'Brian, President
Mountain High Hikers, Inc.