



877 Paul Nicholson Rd
Blairsville, GA 30512
January 27, 2015

Blue Ridge Ranger District
Andrew L. Baker, District Ranger
2042 Hwy 515 W
Blairsville, Ga 30512

Re: Comments on *Special Use Authorization (SUPs) to Use National Forest System Lands-USDA Forest Service Letter dated January 20, 2015.*

These comments are submitted on behalf of the Mountain High Hikers (MHH), Inc., a hiking club with over 200 members from southwestern North Carolina, northern Georgia and eastern Tennessee. We are frequent visitors and users of the National Forest trails including Coosa Backcountry, Duncan Ridge, and Benton MacKaye Trails. Our club also performs volunteer trail maintenance for several Forest Service Ranger Districts. Previous comments were submitted by the MHH club in regards to similar SUPs in January 2013 and 2014.

As previously noted in past correspondence, a race format on Forest Service (FS) trails has both public and ecological impact. High participant density on the trails produces negative ecological effects and has the tendency to overwhelm the trail system. The question becomes “**how much is too much**”? While one or two races per year, with low participant numbers certainly minimize impact, it appears that there are more races, with larger participant numbers initiated each year using the trail systems in the Blue Ridge District. The SUPs request from the FS includes five recreational races. Two of the five races have particular issues which may compromise the trail systems:

General Comments:

1. The number of race participants has increased in several of these races. This year the two largest races (*Georgia Death Race & Cruel Jewel*) provide a **total of over 600 people** running/worker within a two month timeframe on some of the same trails. This does not take into account all participants running these trails who actively train for the event within the prior weeks. Both these events are multi-day races with large participant density. With high participant numbers, there is no doubt that there are **definitive sanitation issues, (not only trash)** which need to be addressed in the operating plan. It is the norm rather than the exception for simple *multi hour* events to have portable toilet facilities.
2. The number of race participants should not be allowed to expand each and every year, and there should be a maximum number of participants specified by the FS in order to minimize the effects to the natural and physical resources.
3. The FS permit details specific information regarding liability for the FS however, there does not appear to be any insurance information concerning the race organizers included on the application. Do the race organizers have adequate liability insurance for these races? If not, liability issues may ultimately fall upon the FS even though the SUP permit appears to negate this issue. The “Dahlongega Ultra-Marathon Association” which is responsible for the *Cruel Jewel* was formed on October 29, 2014 (according to Web-site documentation) and therefore

does not appear to have historical business information. (Interesting to note that each of these races provide total revenues of \$20,000-\$30,000).

4. **Multi-Use Permits:** Since the FS will still require that an operating plan be submitted and approved for each separate event, what is the purpose of the multi-year permit? When allowing a multi-year permit, a race director may become complacent regarding the event and historical race issues since the permit is *automatic*.
5. While it is sometimes difficult to justify additional FS hours, a monitoring plan should be developed which would provide trail conditions, ecological and wildlife information-before and after race activities. This would include information regarding trail status, safety issues, and threatened and endangered plant and animal species within the race area. Attainment of such a monitoring plan could be initiated in one or two heavily traveled areas in order to ascertain overall conditions.

Specific Comments:

1. *Georgia Death Race*-March 14-15, 2015 (300 participants). This race starts at Vogel State Park and ends after 68 miles at Amicolola State Park. Uses portions of the Coosa Backcountry, Duncan Ridge, and Benton MacKaye trail systems and then NFS roads.
 - a. Participant density is high. The number of participants has increased from 200 in 2013 to 300 in 2015. This race format should be changed to minimize trail use and utilize more NFS roads. There are several portions of this trail system that are heavily used by hikers during all seasons.
 - b. Sanitation issues as noted above.
2. *Cruel Jewel* May 15-17, 2015 (250 participants/50 spectators). Utilizes **all trails**- Coosa Backcountry, Duncan Ridge, Benton MacKaye, and Aska Trail systems.
 - a. The participant density is high and increased. Was 150 participants in 2014.
 - b. One could easily minimize trail use by using NFS road system in several areas.
 - c. Sanitation issues as noted above.
 - d. Safety issues-Swinging Bridge on the Benton MacKaye- Has the FS conducted a recent safety inspection of this pathway? The structure of this bridge may not have included the additional *stress points* of several runners on the bridge at a point in time.

The above comments are to be considered “constructive in nature” and the MHH club would appreciate communication from the FS regarding the proposals and comments included in this letter and other FS proposals which relate directly to the issue of SUPs. We believe that it is important to strike a balance between participant use and the beauty, uniqueness and solitude of undeveloped natural areas with existing hiking trails.

Sincerely,

Judie Kean, Conservation Director
MHH Club, Inc. (kean_j@msn.com)

C: Michael O'Brien-President MHH, Inc.