

August 12, 2024

Via Electronic Submission

James Melonas
Forest Supervisor
National Forests in North Carolina
160 Zillicoa St, Ste A
Asheville, NC 28801

Re: Comments on Grandfather, Appalachian, Pisgah (GAP) Restoration Project Draft
Environmental Assessment

Dear Mr. Melonas,

American Whitewater is pleased to comment on the Draft Environmental Assessment ("Draft EA") for the Grandfather, Appalachian, Pisgah Restoration Project ("GAP Project"). The activities proposed in the Draft EA have the potential to benefit as well as impact rivers and recreation on the Forest. We ask that the final EA contain more detailed consideration of potential impacts to whitewater, Wild and Scenic, and Wild and Scenic eligible rivers on the forest, or that the EA contain a commitment to site-specific project-level NEPA analyses of proposed project work overlapping with these areas.

It is important to note that rivers, like forests, can benefit from restoration work. Whitewater paddlers generally appreciate restoration projects that integrate river values, and such restoration projects are also supported by the Wild and Scenic Rivers Act (WSRA) on protected rivers. The WSRA is supportive of projects that enhance but do not substantially interfere with or unreasonably diminish the protected values of rivers. These standards allow for significant restoration work to occur in protected river corridors, but not without special consideration of the river values. For example, there are regional examples of successful and publicly-supported prescribed burning in designated WSR corridors. On the other hand, there are also activities that could occur in VMA's that if improperly sited could impact river values. American Whitewater would appreciate the opportunity to work with the Forest Service in a NEPA setting to design projects in river corridors that can both accomplish restoration goals and protect river values.

While there could be others, we would like to highlight several specific places that we feel merit additional consideration, as noted below.

Wilson Creek is a federally designated Wild and Scenic River, and the GAP Project includes several Vegetation Management Areas (VMAs) that appear to potentially fall within the viewshed of the popular day-use and whitewater paddling corridor of the river (in GFR20), and

within the viewshed of other upstream reaches (in GFR11). Scenery is a very important value to Wilson Creek visitors, and both scenery and recreation are protected values of the river under the Wild and Scenic Rivers Act. Additional site-specific NEPA analysis is needed to ensure that forest management activities are designed to protect or enhance the scenery of the river corridor.

The North Fork of the French Broad River is a Wild and Scenic eligible stream and popular whitewater river in a rugged gorge.¹ The Gap Project includes one small VMA that borders the right bank of the river through the heart of the whitewater run and eligible reach. While some vegetation management activities in this area could be compatible with the recreational and scenic values of the river, others could potentially unreasonably diminish those values. Additional site-specific NEPA analysis is needed to ensure that forest management activities are designed to protect the scenery and recreational values of the river corridor.

The Thompson River has some truly majestic waterfalls on par with other regional waterfalls that draw significant tourism. The GAP Project includes a VMA that borders the left side of the Wild and Scenic eligible Thompson that includes or is adjacent to two significant named waterfalls including the impressive and accessible High Falls. Additional site-specific NEPA analysis is needed to ensure that forest management activities are designed to protect the scenery and recreational values of the river corridor.

We ask that the Forest Service offer additional site-specific NEPA analysis of special places on the Forest like the aforementioned rivers. It is exciting to see restoration being prioritized on the Forest and we are confident that site-specific analyses will create more rather than fewer opportunities to improve the forest and its rivers. Thank you for considering these comments.

Sincerely,



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¹ See a map of rapid locations at:
<https://www.americanwhitewater.org/content/River/view/river-detail/1077/map>