

Data Submitted (UTC 11): 8/19/2021 4:00:00 AM

First name: Anne

Last name: Heikkila

Organization:

Title:

Comments: [External Email]GAFW 14-day stay comments

[External Email]

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Mr. Hunter,

Please find attached Georgia ForestWatch's comments on the proposed 14-Day Stay Limits in the Chattahoochee-Oconee National Forests. Thank you for your attention to this issue and for the opportunity to provide comments.

Anne Heikkila

Board President

Georgia ForestWatch

gafw.org

8/24/2021

Mr. Edward Hunter, Jr. Forest Supervisor

Chattahoochee-Oconee National Forest 1755 Cleveland Hwy

Gainesville, GA 30501

Re: Proposed 14-Day Stay Limit Dear Mr. Hunter:

Thank you for the opportunity to respond to and for considering the following Georgia ForestWatch (GAFW) comments to the Proposed 14-Day Stay Limits in the Chattahoochee-Oconee National Forests. GAFW supports limiting the 14-day time one can stay on a campsite. Due to the high demand and limited number of sites, there is obviously a heavy use on some camping sites. GAFW believes that 14 days should be more than sufficient for most visits (exceptions can be allowed). In some highly sought after and heavily used, locations, lesser stays might be considered on an individual basis. Of course, these proposed actions will require surveillance and enforcement, which we hope that the USFS can provide.

GAFW supports the proposed camping restrictions. Protecting the forest from over-use is very important. The need for limiting continued use of campsites is understandable. However, it appears that the major intent of this order to discourage semi-permanent campers (de facto residents). Perhaps this order should explicitly state that long-term camping; exceeding 14 days is not permitted. It is not clear from the overview provided if the campsite used for 14 days will subsequently

be left vacant for a designated recovery period. As a suggestion, the order could include that campsites will be closed for a recovery or restoration period as determined by USFS personnel after 14 days of continuous use (either by a single or combination of campers). Designating the campsite closure with a sign could inform/educate campers on the importance of limiting overuse and providing a recovery period. Closing sites and designating the closure with an educational sign could strengthen this order's ability to prevent over-use of camping areas.

The current policy appears to allow occupation of another site greater than one mile from the vacated site (see below clip). This could allow a person or group can continually occupy different locations of the National Forest as long as they are greater than 1 mile from the previous site before returning again to the original site. If so, this would mean that a person could rotate back and forth between two sites that are greater than one mile apart repeatedly and indefinitely, thereby becoming "relocating nomadic squatters" on federal lands.

[Idquo]The current closure orders dealing with the 14-day stay limit on the Chattahoochee-Oconee National Forests includes, CO-17-03 (Developed Recreation Areas) and CO-13-36 (General Forest Orders), and states "[hellip]establishing, maintaining, or using a developed campsite/dispersed campsite shall be limited to a period not to exceed 14 consecutive days.

Upon vacating a site, all personal property will be removed. A new campsite may not be re-established within 1 mile of the vacated campsite for a period of 7 days. 36 CFR 261.58(a)[rdquo].

The proposed policy (second statement) reads:

[Idquo]Prohibiting camping in excess of 14 days within any 30-day time period will ensure that campsites are vacated and available at least every 14 days, to provide for use and enjoyment by as many members of the public as possible[rdquo].

This appears to mean that persons cannot occupy Forest Service lands (within the same forest?), regardless of location, for more than 14 days within a 30-day period. This would imply that persons would need to rotate between National Forests (Chattahoochee, Cherokee, Nantahala, Pisgah and others).

GAFW commends Supervisor Hunter and his staff for addressing a long-simmering issue. It may be difficult for the FS to enforce this order with the limited resources that they currently have. Decades ago there were 8 separate districts on this forest, now there are three with far fewer employees. In this his letter, Mr. Hunter states that this Forest experiences 3 million visitors a year. Fortunately, most visitors are law abiding, but without signs and notices posted how are visitors to know what they can and cannot do?

The area along Mulky Gap/Cooper Creek Roads is frequently used as improved and dispersed campsites and is often more-or-less continually occupied by the same parties. Several locations have multiple vehicles and tents/trailers and gear left in place when no one is present, in an apparent attempt to [Idquo]claim[rdquo] that location. There are commonly over-used campsites by the side of the road, many between the road and the streams which are blocked and clearly posted that camping is prohibited. The same can be seen along the Upper Chattahoochee camping areas along F.S. 44 and other roads where people have established a long-term/seasonal encampment.

In many of the streamside and other camping locations, there is no evidence of sanitary or waste disposal facilities. Streamside and water-quality degradation can clearly be evidenced. Closed (and proposed for closure) improved campgrounds such as the Upper Chattahoochee, Boggs Creek and perhaps others may pose special sanitation and enforcement problems as they

become de facto [ldquo]dispersed[rdquo] sites with no sanitary facilities.

Several years ago, Trout Unlimited spent a good deal of time working with the FS to post no camping notices on degraded sites along Noontootla Creek, one of Georgia[rsquo]s premier trout streams. Many of these [ldquo]closed[rdquo] areas had been opened back up.

We recognize that the recent covid outbreaks have driven many persons to the forest to [ldquo]escape[rdquo] more dense populations. There may also be persons who have been displaced and Forest

Service and other government lands may be semi-permanent residences. We regret that some persons may have been forced into these situations, but public health, safety and sanitation must be taken into consideration.

Conclusions:

GAFW hopes that the USFS will carefully monitor and evaluate these policies. We further hope that the USFS will develop and maintain a database of the locations, participation and successes/failures of these policies to be used to determine the levels of use that the Forest can sustain. Ultimately this may result in the development of a carrying capacity study of the forest and resources to determine the limits of sustainability of the forest for recreational and other activities. As additional pressures are placed on the forest, limitations to some activities in some areas will be required.

We recognize that monitoring and enforcing the proposed new policy will create an additional burden on the existing USFS staff. We support the proposed new policy on camping limits and hope that the Agency can find the resources to enforce them. GAFW would be pleased to pass along locations and conditions of clear violations, as we have with roads that should be closed and illegal ATV trails, should that be of use to you.

Thank you again for the opportunity to comment. We hope our observations and comments are received in the spirit in which they were intended, to help preserve, protect and restore our national forests. We look forward to hearing from you about any further developments on these policies

Sincerely,

Anne Heikkila Board President
Georgia ForestWatch
81 Crown Mountain Place, Bldg. C, Suite 200
Dahlonega, GA 30533 (706) 867-0051