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## **Your Comments Are Needed to Protect Water Quality and Trout Habitat in the Tellico River**

The Forest Service is asking for comments on its long-term plan to address water quality violations caused by the 39-mile Tellico Off-Road Vehicle (“ORV”) Area on the North Carolina/Tennessee border near Murphy, NC. The Tellico ORV Area is in the headwaters of the Tellico River, one of the best strongholds for native brook trout, a species in decline in the North Carolina and Tennessee. The Forest Service has completed a comprehensive analysis of the trail system and concluded that the Tellico watershed is **not a suitable location for an ORV area** because of highly erosive soils and close proximity to important trout streams. The Forest Service found:

- ? **The trail system is in violation of forest plan standards and is causing nearby streams to violate North Carolina water quality standards.**
  - Approximately 75,000 tons of soil have been displaced from the trail system since it was created.
  - Sediment levels in streams affected by the trails are higher than nearby reference streams and are in violation of state water quality standards.
  - Visible sediment leaves the trail system from 2,000 independent sources with one third of those sediment trails extending all the way streams.
  - Soil samples from the trail system contain elevated levels of petroleum.
  - Streams affected by the trails are embedded with sand and silt, which inhibits trout spawning.
  
- ? **Management strategies to control sediment runoff in the Tellico ORV Area are ineffective due to highly erosive soils and heavy rainfall.**
  - ORV trails have deteriorated so far that ordinary management practices will no longer work.
  - Soil types in the area are rated as “poorly suited” for unsurfaced roadways.
  - All trails in the system are rated as “severe hazard” for erosion indicating that “erosion of the trail is expected” and “costly erosion control measures are needed.”
  - Less than half of sediment management practices are working properly.
  - Management practices are ineffective at keeping sediment out of streams for the six miles of ORV trail that are within 100 feet of trout streams.
  - Even trails that have been recently rehabbed with sediment control structures and gravel surfacing were only 50% effective at preventing sediment from reaching streams.

**As a result, the Forest Service is unable to maintain the Tellico ORV trail system to a standard that would prevent degradation of water quality and trout habitat. The Forest Service is required by law to take the action necessary to meet state water quality standards and protect trout habitat.**

The Forest Service is considering six alternatives to address this problem. Under consideration are an alternative that would keep the current 38-mile ORV trail system unchanged (Alternative A) and two more alternatives that would add new trails to the system (Alternatives E and F). Given the Forest Service's decades-long track record of inadequate maintenance of the Tellico ORV area, these alternatives are unacceptable. The Forest Service projects that these alternatives have no or "low" likelihood of meeting water quality standards.

Two more alternatives (Alternatives B and D) would reduce existing trail miles but would continue to provide ORV trail access in the Upper Tellico River watershed. The through analysis conducted by the Forest Service documents that the Upper Tellico watershed is unsuitable for use as an ORV trail system. These two alternatives would keep open approximately 3 miles of ORV trail within 100 feet of trout streams, where management practices have proven ineffective in the past. All the trails kept open under these two alternatives will be on the same soils, at "severe hazard" of erosion according to the Forest Service analysis, that the agency has been unable to maintain in the past. The Forest Service has documented recent experience indicating that even properly-maintained sediment control strategies are only 50% effective at keeping sediment out of trout streams in this highly erosive watershed. As a result, the Forest Service projects that these two alternatives would have only a "moderate" likelihood of meeting water quality standards.

The Forest Service's preferred alternative, Alternative C, would close the ORV trail System, but would maintain over 10 miles of existing Forest system roads in the area, open year-round or seasonally, to provide for public access for highway-legal vehicles for hunting, fishing and other recreation uses. The analysis in the Forest Service's Environmental Assessment is clear that **only Alternative C, which would close the ORV system, has a high probability of meeting state water quality standards.**

**Contact the Forest Service** and let them know you support the agency acting on this information by **closing the Tellico ORV system to protect water quality and trout habitat (Alternative C)**. Also let the agency know you support its proposal to **keep the area closed temporarily until the Forest Service reaches a final decision on the future of the Tellico ORV system.**

**Send in your comments by March 27, 2009 by emailing them to: comments-southern-north-carolina-nantahala-tusquitee@fs.fed.us; by mailing them to: National Forests in North Carolina, Attn: Candace Wyman, 160 A Zillicoa Street, Asheville, NC 28801; or faxing them to 828-257-4263.**