

**OBED
WILD &
SCENIC
RIVER**

TENNESSEE

**Final
General Management Plan
Development Concept Plan
Environmental Impact
Statement**

JUNE 1995

**U.S. Department of the Interior
National Park Service**

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INTRODUCTION TO THE FINAL GENERAL MANAGEMENT PLAN/DEVELOPMENT CONCEPT PLAN/ENVIRONMENTAL IMPACT STATEMENT

This document is an abbreviated Final General Management Plan/Development Concept Plan/Environmental Impact Statement for Obed Wild and Scenic River, and the material included here is to be integrated with the Draft General Management Plan/Development Concept Plan/ Environmental Impact Statement (DES 94-49). The abbreviated format has been used because the changes to the draft document are minor and confined primarily to factual corrections, which do not modify the analysis. Use of the format is in compliance with the 1969 National Environmental Policy Act

regulations (40 CFR 1503.4 (c)). The draft and final impact statements together describe the final plan, its alternatives, all significant environmental impacts, and the public comments that have been received and evaluated. For the reader's convenience, pages on which changes have been made to the draft plan have been reproduced in full, including page numbers, on the following pages. Text that is to be removed from the draft document appears as ~~remove~~. Text to be added appears as **add**. No changes have been made to maps or graphics.

**CORRECTIONS AND REVISIONS TO THE FINAL
GENERAL MANAGEMENT PLAN/DEVELOPMENT
CONCEPT PLAN/ENVIRONMENTAL IMPACT
STATEMENT**

Final
General Management Plan/Development Concept Plan/
Environmental Impact Statement

Obed Wild and Scenic River
Morgan and Cumberland Counties, Tennessee

A general management plan has been prepared for the Obed Wild and Scenic River (Obed WSR) pursuant to the National Parks and Recreation Act, P.L. 95-625, and NPS policy to provide for the protection of Obed WSR values and address resource management and visitor use. The plan has been prepared in cooperation with the Tennessee Wildlife Resources Agency and with public and agency involvement, and will guide management of the Obed WSR for approximately the next 10 to 15 years. Two alternatives for the general management and use of the Obed WSR and the environmental consequences of each are presented and analyzed. "**Alternative A, The Preferred Course**" constitutes the Park Service's proposed course of action and represents the minimum actions and developments needed to make the Obed WSR operational. This alternative proposes a management zone system representing area specific applications of management objectives; a resource management strategy that addresses the complexity of issues both inside and outside the Obed WSR boundaries; enhanced and expanded visitor oriented programs and facilities to provide visitors the opportunity to experience the special values of the Obed WSR; expanded boundaries to include approximately 200 acres of land and more than 6 river miles and, in the future to study and potentially include other river sections. "**Alternative B, The Existing Course**" is based primarily on continuing the present course of action which includes implementation of the *1978 Development Plan* and its modifications as updated by new data and specific program planning. Most of the proposals in this alternative are very similar to Alternative A, however, there are some key differences. The management zone system is based on ownership patterns; landscape character is not addressed as a resource; some different visitor facilities are proposed including different locations for an overlook and trails and more roads to be developed and maintained; and only two tracts containing less than 65 acres would be added to the boundaries. Because the Alternatives are so similar, the environmental consequences of implementing either alternative are also similar. Overall, neither alternative would have a significantly adverse effect on the resources and values of the Obed WSR. Most impacts from development and use would be mitigated. The additional roads and different overlook development proposed in Alternative B would negatively affect a greater amount of land and vegetation. Since county tax income may be reduced if lands are acquired in fee, the socioeconomy may be impacted more from implementing Alternative A as more boundary adjustments are proposed. However, it is difficult to accurately predict this impact since a land acquisition strategy—fee or less-than-fee—has not been determined for these lands. Alternative A was selected as the Proposed Action because it: brings the *1978 Development Plan* in line with NPS Management Policies based on additional information and the management objectives, provides an overall direction for resource management and interpretation, and contains a management zone system based more specifically on the Wild and Scenic River legislation, resource opportunities and constraints, and the desired visitor experience. The Draft General Management Plan/Development Concept Plan/Environmental Impact Statement was distributed in December 1995. Attached pages show the changes that came from the review and the responses to the comment letters.

For further information about this document, contact:

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or

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SUMMARY

The *1978 Development Plan* was prepared pursuant to the Wild and Scenic Rivers Act, P.L. 90-542. This **Final** General Management Plan/Development Concept Plan/Environmental Impact Statement (GMP) was prepared to satisfy the requirements of the National Parks and Recreation Act, P.L. 95-625, and NPS policy which requires the preparation of a GMP for all units of the National Park System. A GMP addresses not only development but also resource management and all aspects of visitor use. The general management plan serves to guide development of the Obed WSR, as the *1978 Development Plan* did, but also guides the overall management and use of the park in ways that will best serve visitors while preserving the values for which the Obed WSR was established.

The GMP has been prepared in cooperation with the Tennessee Wildlife Resources Agency, and with public and agency involvement, and will guide management of the Obed WSR for approximately the next 10 to 15 years. It presents two alternatives for the management of the Obed WSR, one of which the Park Service prefers and is identified as the Proposed Action.

In many respects, the two alternatives are very similar in dealing with visitor use, park operations, and facility development. However, there are important differences between the alternatives regarding such topics as land use and management and boundary adjustments.

“Alternative A: The Preferred Course” constitutes the Park Service’s proposed course of action. This alternative also represents the minimum actions and developments needed to make the Obed WSR operational. A new management zone system has been devised representing area specific applications of the Management Objectives. An overall strategy for

resource management addresses the complexity of the Obed WSR and the need to address resource issues both inside and outside Obed WSR boundaries. Visitor oriented programs and facilities would provide visitors the opportunity to experience the special values of the Obed WSR. Revised interpretive themes and an expanded interpretive services program is proposed. Overlooks would provide visitors visual access to the Obed WSR. One developed overlook would be located near Lilly Bridge at Lilly Bluff. A long distance trail system, located primarily on lands managed by the National Park Service, and expanded camping facilities are also proposed. Facilities for river access and associated uses would be accommodated within appropriate management zones. The visitor contact center, administrative headquarters, and maintenance facility would remain in Wartburg. Some changes would be made in the current use and management of easements to provide for protection of values and accommodate visitor access. Boundaries would be expanded to include approximately 200 acres of land and more than 6 river miles and other river sections may be studied in the future for potential inclusion.

Alternative A was selected as the Proposed Action because it:

- is more consistent with NPS Management Policies based on additional information and the management objectives,
- provides an overall direction for resource management and interpretation, and
- contains a management zone system based more specifically on resource protection and visitor experience.

MANAGEMENT OBJECTIVES

The Management Objectives that follow are referred to throughout the general management plan. They are presented in three categories.

Resources

To achieve and maintain the highest water quality -- using current State water quality standards as a minimum -- and natural stream flows that are beneficial to aquatic life and suitable for a free flowing condition where both quality and quantity provide optimal conditions for the preservation of the river system's naturally diverse and native aquatic life and also for swimming.

To protect the natural systems, cultural resources, landscape character, and biodiversity of the Wild and Scenic River area.

To maintain the natural abundance and diversity of native wildlife populations.

Visitor Experience

To provide the opportunity and means to learn about, experience, and enjoy the special values of the Obed WSR (essentially primitive, unpolluted, and generally inaccessible) while assuring the protection of those values.

For the "Wild" river areas (44.25 river miles): To provide the user the opportunity to experience the primitive nature of the resource between existing public bridge crossings.

For the "Recreational" river areas (0.95 river miles): To provide the user the opportunity for outdoor recreation experiences in a natural setting.

Development

To provide the following types of access and development with minimal resource degradation in concert with the river classification.

--Provide vehicular access and minimal public use facilities along the river, only at existing bridge crossings;

--Provide hiking trails;

--Provide scenic overlook experience(s); and

--Allow for and manage primitive camping.

trail leading from the parking area to the boardwalk. Surface stabilizers bond native aggregates with soil stabilization agents to form durable, dust-free, permeable, hardened surfaces that retain the natural color and texture of regional soils. These agents are nontoxic, environmentally safe materials, such as pine tar derivatives and complex protein molecules. The trail and boardwalk would meet the Americans with Disabilities Act Guidelines.

A monitoring program would be established to develop information on the plant community before construction begins, monitor the success of the design once installed, and mitigate any problems. Waysides and NPS staff would be used to educate visitors on the value and need to protect the plant community.

TRAILS

A system of linear and looped trails would provide approximately 30 miles (48.3 kilometers) of hiking opportunities amidst both "wild" and "recreational" settings. The Long Distance Trail Map depicts the general location of these trails. The long distance trails connect segments of existing paths that have been created during many years of use. The Park Service would prepare a Trail Layout Study before construction of these trails. The study would delineate exact trail locations in order to accommodate visitor access to a variety of destinations along both river and bluff sections while providing for the protection of sensitive resources. Several shorter, more feature specific trails would also be developed and are described within the sections on Overlooks, Camping, and River Access.

Linear Trails

An approximately 6.5 mile (10.4 kilometer) trail would connect Nemo and Lilly Bridges. Much of this trail currently exists having been formed during years of hunting, fishing, and hiking use in the area. Areas where hikers could cross the Emory,

upstream of where it joins the Obed, needs to be identified so hikers can travel the entire route.

Loop Trail

A long distance loop trail, approximately 20.5 miles (33 kilometers), would follow the north side of the Obed River and the south side of Clear Creek. The NPS currently has fee title to much of this land. Additional interests may need to be purchased to permit public access and trail construction on lands where the NPS has only acquired easements. Along the western portion of this loop, the trail would follow a short section along the Catoosa WMA boundary, cross Genesis Road, and follow the Hawn Spring Branch back to the current Obed WSR boundary. Trail access along Hawn Spring Branch would be acquired as discussed in the section on Land Protection.

Support for Additional Trails

Based on public interest and support, the Park Service would consider developing other trails that are consistent with NPS Management Policies, regulations, and the GMP. This could include the two trails described in the *1978 Development Plan*-- an extension of the existing Cumberland Trail and a trail traversing the southern portion of the Obed River between Devils Breakfast Table and Adams Bridge (see Alternative B for further description of these trails).

Identification and support for trails on or through Catoosa Wildlife Management Area and other adjacent lands would be encouraged due to the limited, narrow land base along most of the Obed WSR. Also, significant portions of Obed WSR lands are not owned in fee by the Park Service.

CAMPING

Two types of camping are proposed: "developed" and "undeveloped". Developed camping areas would provide for camping in a natural setting with some development of facilities and would only occur in the

information boards to be located at river access and overlook sites.

River use and hunting safety messages would be available through radio, newspapers, pamphlets and on the information boards.

Onsite Services

Information would be provided by rangers on patrol and through interpretive devices. Currently, park rangers casually contact visitors to provide assistance and information. Interpretive devices, such as waysides, would be located at the developed overlook and several of the river access points.

Outreach Services

Interpretive programs would continue to be done on request for area schools, parks, and community groups as staff is available. Topics requested on a regular basis include: Biodiversity, DARE (Drug Abuse Resistance Education), Orientation to the Obed WSR, Pioneer/Longhunter (living history demonstration), Web of Life (the ecosystem and how things fit together), and White Water Canoe Instruction.

OVERLOOKS

Two developed overlook sites are proposed in the *1978 Development Plan*: one near the Obed and Clear Creek Junction and one at Devils Breakfast Table. A road access corridor was purchased in 1972 to provide public access to the Obed/Clear Creek Junction site but no development has occurred due to lack of funding. Just recently, the park received funding to begin development.

An approximate 1.3 mile (2.1 kilometer) access road, with a concrete bridge spanning Melton Mill Branch, would be developed and lead to a 10 space parking area. A surface stabilized trail, accessible to visitors with disabilities, would lead to an overlook platform with railing. The trail would continue on to other undeveloped

overlooks in the area but would not be surfaced. Sanitary facilities, garbage receptacles, and waysides would be added to the site, and some select and limited clearing of vegetation would occur.

Presently, there are no plans to develop the second overlook at the Devils Breakfast Table site.

TRAILS

Two linear trails would be developed providing 32.5 miles (52.3 kilometers) of hiking opportunities. A portion of the Cumberland Trail, on NPS lands, has been completed. ~~No further progress has been made on establishing this trail as interest in the project by others has waned.~~

The second trail traverses the southern portion of the Obed River between Devils Breakfast Table and Adams Bridge. This trail would provide hiking opportunities when Catoosa WMA lands are open and an emergency route for boaters and hunters. To provide for wildlife management, Catoosa WMA lands are closed to all but hunters during managed hunts and to everyone in February and March.

CAMPING

Primitive camping would be available at the Norris Bottoms Campground and at river access sites. Norris Bottoms Campground, located near Nemo Bridge, contains six sites with room for some expansion, parking, picnic tables, fire rings, garbage receptacles, and sanitary facilities. Additional campsites with similar facilities would be located at the river access sites.

RIVER ACCESS

Opportunities for boating, swimming, fishing, hunting, hiking, camping, picnicking, and sight-seeing would be available at the river access sites. The following improvements to accommodate these activities would be provided at existing bridge crossings and NPS owned rights-of-way.

Norris Bottoms which contains six campsites, parking, and sanitary facilities. Potters Ford, Huse Potter Ford, Barnett Bridge, and Fox Creek are also popular camping areas but have no facilities.

Picnicking. Visitors picnic throughout the Obed WSR but use is concentrated at river access sites and near popular swimming holes. Picnic tables and trash receptacles are located at Nemo Bridge and Jett Bridge.

Hiking. The most popular hiking routes follow fishing trails, old road beds, and old fire lines and include Lilly Bridge to Canoe Hole, Lilly Bridge to Lilly Bluff, the Obed River/Clear Creek Junction area, and Obed River/Clear Creek Junction to Obed Junction. Many of these routes contain spectacular views of the Obed WSR or lead to interesting geologic formations. Some hiking also occurs around the Nemo Bridge area, from the bridge to Turn Hole. The only designated trail within Obed WSR is a portion of the Cumberland Trail. This trail is currently not a popular route as since it does not overlook the Obed WSR River or lead to a specific destination continue beyond the Obed WSR boundaries.

Sight-Seeing. A variety of sight-seeing opportunities exists in and near the Obed WSR. Visitors come to the Obed WSR and Catoosa WMA to see the streams, gorges, and other geological features, wildlife, white water boating, and the fall vegetation colors. No specific facilities currently exist to provide visitors views of the Obed WSR. As discussed under hiking, the most popular trails tend to lead to areas where spectacular views are available. Two of the most popular areas are around Lilly Bluff and Obed River/Clear Creek Junction.

Hunting. The relatively small land base and narrow corridor limit the amount of hunting that actually occurs within Obed

WSR. Most hunting occurs on the adjoining Catoosa WMA and private lands.

Deer, boar, turkey and small game may be hunted in season with a permit from TWRA. Wild boar and deer hunting seasons coincide during scheduled periods from September through December.

Catoosa WMA and roads through it are closed from February 1 to March 28. This area is also closed to nonhunters during deer season in the fall and turkey season in the spring.

Rock Climbing. Climbing and rappelling are year-round activities and participation is increasing at Obed WSR. Two years ago, rock climbers only visited Obed WSR about once every 3 or 4 months. Presently, 10 to 15 climbers are expected on a weekend day.

Climbers use old road beds, old fire lines, and fishing trails to access climbing areas. The most popular rock faces to climb are located on:

--the north side of Clear Creek between Lilly Bridge and Canoe Hole;

--the north side of the Obed River just upstream from Obed River/Clear Creek Junction; and

--the south side of Clear Creek between Lilly Bridge and Obed River/Clear Creek Junction.

Climbers construct trails and clear vegetation along the bluff where climbing is taking place. Ladders and fixed routes are periodically installed by climbers as are holes in the bluff for permanent anchor points. It is not known if any significant resource damage is occurring from present use.

Cumberland Trail. The route of the Cumberland Trail starts at Highway 27, approximately 7 miles (11.27 kilometers) south of Wartburg, and goes through Morgan, Campbell, and Anderson Counties and on north to Cumberland Gap National Historical Park. Only portions of the trail for hiking and backpacking have been developed, mostly on private property. Originally, the trail was organized and maintained by the Department of Conservation, Division of Parks and Recreation, however, the project had been abandoned. More recently, the Tennessee Trails Association has adopted this trail and is actively seeking an extension of the trail. Tennessee Trails Association developed various sections of the trail and remains active in maintenance and seeking extensions of the trail. Between 1981 and 1991, the State's Department of Parks and Recreation was involved in trail construction and management until funding for the trail was eliminated. Hiking, backpacking, and camping opportunities exist along portions of the trail route.

Big South Fork National River and Recreational Area. The southern entrance to Big South Fork National River and Recreation Area (NRRRA) lies about 45 miles (72.4 kilometers) north of Wartburg. Recreational opportunities are similar to those in the Obed WSR although Big South Fork NRRRA has a much larger land base. Opportunities and facilities are available for backcountry and primitive camping, hiking, swimming (a pool is located in the campground), white water boating, horseback riding, and mountain bicycling. Hunting is allowed in season.

Cumberland Mountain State Park. Located in Cumberland County, 5 miles (8 kilometers) from Crossville, Cumberland Mountain State Park contains camping (with rest rooms and showers), lodging, hiking trails, playgrounds, picnicking, and a lake for swimming and boating.

Tennessee Valley Authority (TVA). The TVA manages numerous water projects in central and eastern Tennessee. The closest TVA reservoir is Watts Bar Lake on the Tennessee River which is located about 20 miles (32.2 kilometers) south of Wartburg. Also within the 50-mile radius (80 kilometer) are Melton Hill, Norris, Fort Loudoun, and Tellico Reservoirs offering a variety of recreation opportunities. Opportunities available include motorized boating, swimming, fishing, and picnicking.

The TVA also operates a program to provide for public access to navigable rivers. Through this program, The TVA designed and paid for construction of the facilities at Jett Bridge. TVA owns properties at the following sites that provide access to river sections inside the Obed WSR: Adams Bridge on the Obed River; Center and Meridian Bridges on Daddys Creek; and Twin and Lavender Bridges on White Creek (a tributary of Clear Creek).

Pickett State Park. This State park is located in Fentress County, about 60 miles (96.5 kilometer) north of Wartburg. There are opportunities for camping and picnicking.

Great Smoky Mountains National Park. This popular national park is about a 2-hour drive and about 90 miles (145 kilometer) southeast of Wartburg. The park provides opportunities for many outdoor recreational activities including camping and hiking.

Cherokee National Forest. Adjacent to the Great Smoky Mountains NP, Cherokee National Forest contains hiking trails and campgrounds.

White Water Rivers. Many rivers in East Tennessee offer a wide variety of white water boating experiences. Some of the most heavily used rivers include: Tellico River; Little River; Little Pigeon River;

EFFECTS ON CATOOSA WILDLIFE MANAGEMENT AREA

Alternative A: The Proposed Action

No significant impact would occur on the Catoosa WMA from implementation of this Alternative. Designation of 6 additional river miles of the Obed WSR, currently owned by TWRA, and application of the management zone system would not affect current use patterns. TWRA would need to devote a minimal amount of space in their Crossville office to display and store informational materials on the Obed WSR.

Alternative B: The Current Course

No significant impacts would occur from implementation of this alternative. The existing MOU currently addresses provisions for the proposed 32.5 miles (52.2 kilometers) of trails to occur on Catoosa WMA lands.

where access is very limited and economically retrievable mineral deposits are not known to exist.

Alternative B: The Current Course

No significant impacts would occur from implementation of this alternative.

CUMULATIVE IMPACTS

No specific cumulative impacts have been identified resulting from implementation of either of the alternatives. Generally, recognition of the Obed WSR's presence and, therefore, the need to protect its values and visitor experience, is expected to increase over time.

EFFECTS ON MINERAL RESOURCES

Alternative A: The Proposed Action

Although coal, sand, gravel, and sandstone deposits occur within the Obed River watershed, only a few coal mines operate in the region and sandstone has been quarried near Obed WSR on the right side of Clear Creek below Barnett Bridge. Sand, gravel, or sandstone have been removed from the Obed WSR only by theft. Mineral deposits within Obed WSR's existing and proposed boundaries have been mined or probably exist in such small quantities or inefficient forms that mining them would not be economically feasible. The addition of approximately 200 acres and 6.5 river miles to the Obed WSR would likely have no effect on existing or future mineral withdrawal operations in the region since these areas are primarily within the river gorge

Summary of Environmental Consequences

Resource Topics	Alternative A: The Proposed Action	Alternative B: The Current Course
Effects on Water Resources	Documents the existing quality of waters. Reduces water resource impacts over the long-term. Short-term sedimentation impacts due to facility construction.	Water resource impacts would not be reduced as much as in Alternative A. All other consequences are the same.
Effects on Floodplains and Wetlands	No adverse impacts to floodplains. Enhanced protection for wetlands.	Wetland protection would not be as enhanced as in Alternative A.
Effects on Vegetation and Wildlife	Increased protection for vegetation and wildlife. Impacts expected from facility development to include loss of some vegetation and displacement of small wildlife species.	Vegetation and wildlife protection would not increase as much as in Alternative A. Greater amounts of vegetation lost and wildlife species displaced because of additional roads and different location of developed overlook.
Effects on Air Quality	No significant positive or negative impacts.	No significant positive or negative impacts.
Effects on Cultural Resources	Enhanced protection and appreciation for cultural resources.	Enhanced protection and appreciation for cultural resources.
Effects on Prime and Unique Agricultural Lands	No such lands have been identified.	No such lands have been identified.
Effects on Visitor Use	Use patterns would change for some current visitors. Illegal activities would decrease. Total use would increase.	Use patterns would change for some current visitors. Illegal activities would decrease. Total use would increase.
Effects on Accessibility	Enhanced accessibility for visitors with disabilities.	Developed Overlook would be accessible to visitors with disabilities.
Effects on Socioeconomics	Tourism would increase. County tax income may be reduced if boundary adjustments are acquired in fee.	Same as Alternative A except that fewer acres of boundary adjustments are involved.
Effects On Catoosa WMA	No significant impacts.	No significant impacts.
Effects on Mineral Resources	No significant impacts.	No significant impacts.
Cumulative Impacts	Increased recognition over time for Obed WSR and need to protect its values and visitor experience.	Increased recognition over time for Obed WSR and need to protect its values and visitor experience.

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COMMENTS AND RESPONSES TO THE DRAFT GMP/DCP/EIS

Approximately 220 copies of the Draft Obed Wild & Scenic River General Management Plan/Development Concept Plan/Environmental Impact Statement were distributed to agencies, organizations, and individuals. A total of seventeen individuals, organizations, and agencies presented written comments. These letters are reproduced in the following pages with the adjacent National Park Service response.

In addition, thirty-six people attended an Open House (public meeting) at the Obed WSR visitor contact office on January 19, 1995, midway through the public review period for the draft plan. The purpose of the meeting was to provide additional opportu-

nity for the public to comment on the plan. Most attendees simply requested clarification of various plan elements. The most discussed issue was that the GMP should allow multiuse trails to be considered when the trail system is in the design stage and more site-specific information is available. Please see our response #1 to the letter from the Environmental Protection Agency. Other issue-oriented discussions related to traffic safety with the need for better signage in areas where visitation is expected to increase and the need to proceed quickly with the construction of the Lilly Bluff overlook. The Obed WSR sign plan will be updated as new development occurs.

COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
 345 COURTLAND STREET, N.E.
 ATLANTA, GEORGIA 30365
 January 30, 1995

W. Thomas Brown
 Associate Regional Director
 Planning and External Affairs
 U.S. Department of the Interior
 National Park Service
 75 Spring Street, S.W.,
 Atlanta, GA 30303

SUBJECT: Obed Wild & Scenic River, Tennessee, General Management
 Plan, Development Concept Plan, Environmental Impact
 Statement

Dear Mr. Brown:

The U. S. Environmental Protection Agency has reviewed the above referenced document in accordance with its responsibilities under Sections 309 of the Clean Air Act and 102(2)(C) of the National Environmental Policy Act. The document presents alternatives and impacts associated with expanding the Obed Wild and Scenic River (WSR) boundaries to include approximately 200 acres of land and more than 6 river miles; improve river access; addition of a trail system; and revise and expand interpretative services programs. The Obed WSR is a unit in the National Wild and Scenic River system, the only one managed by the National Park Service (NPS), and the only designated Wild and Scenic River in Tennessee.

EPA supports the Alternative A, the Preferred Course, which provides for enhanced primary visitor use and a management zone system based on resource protection and visitor experience. We are concerned, however, about the cumulative impacts of developing and expanding the trail system. New trails will encourage access to heretofore pristine areas, and may encourage unauthorized entrance by motorized trail vehicles such as dirt bikes and all terrain vehicles (ATVs). Adequate staff needs to be available to prevent unauthorized use of the proposed trails. NPS need also consider what restrictions, if any, are appropriate for non-motorized trail bicycles and horse-back riding. Placing trail management plans before the public early in the planning process is easier than having to address unanticipated problems later on. As other parks have experienced, it is difficult to alter the use of public lands once patterns of use have become established.

We applaud the efforts proposed for water resource management, both within the WSR boundaries and the watershed outside the Obed WSR boundaries. The proliferation of water supply and recreational use reservoirs that have been built - or are being contemplated - on the Obed River and its principal

1.

2.

RESPONSES

United States Environmental Protection Agency

1. This comment raises the important point that facility construction without having adequate staff to maintain and patrol these facilities, e.g., trails, is inappropriate and will likely lead to degradation of resources and the visitor experience. The National Park Service will not implement this or any other construction proposal outlined in this plan without adequate support personnel (see page 99, last paragraph). Regarding the application of user-type restrictions on trails, specific decisions on what uses are appropriate in what locations will await the preparation of the Trail Layout Study referenced on page 31. Only after that study will the National Park Service be able to identify precise alignments and the use suited to site-specific conditions.

2. The National Park Service is also very concerned about the project being proposed on Clear Creek. We will be participating to the extent possible in the consideration of that project's potential effects on the Obed Wild and Scenic River and will take action as appropriate. We have recognized the need for, and the Final General Management Plan proposes, a comprehensive water resource protection plan for the upstream watershed in order to minimize future conflicts.

RESPONSES

COMMENTS

2.

tributaries, is a major concern because these will reduce the viability of stream flows in the Obed WSR. We are especially concerned about the 100-acre lake and the 1.5 MGD water treatment plant proposed for construction on Clear Creek (a major tributary of the Obed River) by the Catoosa Utility District and the Farmers Home Administration. Dams and water withdrawals will reduce the flow to the upper reaches of the Obed River and severely compromise the value of the WSR. Without areawide planning, a water impoundment project will induce growth, development, proliferation of waterfront cottages, and as a consequence, make the lake a nutrient catch basin for non-point runoff pollution.

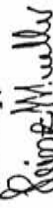
Because impoundments in the Obed watershed may severely limit the resource value of the WSR, we encourage NPS to take action against unreasonable injury to it's rights as a riparian landowner. For NPS to spend resources for WSR designation and improvements, only to have the water resources summarily siphoned away by another project situated upstream, is irrational and unacceptable. We believe NPS has the authority to protect and preserve water resources beyond its boundaries as provided in Public Law 90-542 Section 7.(a), which states in part:

"...[A]nd no department or agency of the United States shall assist by loan, agent, license (italics added) in the construction of any water resource project that would have a direct and adverse effect on the values for which the river was established, as determined by the Secretary charged with its administration. Nothing contained in the foregoing sentence, however, shall preclude licensing for, or assistance to, developments below or above a wild, scenic or recreational river area or on any stream tributary thereto which (italics added) will not invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area."

Because NPS has a mandate to preserve the free-flowing condition and resource value of the Obed WSR, we feel a basin-wide regional comprehensive water resources plan should be conducted concomitant with the Obed WSR designation action. Using foresight, all parties who have interests in this region may be accommodated.

We appreciate the opportunity to review this document. Our rating is EC-2, that is, there are environmental concerns about existing and proposed water impoundments affecting the resource water quality. Please call me or John Hamilton (404) 347-3776 if more information is needed.

Sincerely,



Heinz J. Mueller, Chief
Environmental Policy Section

COMMENTS



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902-1459

January 27, 1995

Mr. W. Thomas Brown
Associate Regional Director
National Park Service
75 Spring Street, SW
Atlanta, Georgia 30303

Dear Mr. Brown:

OBED WILD AND SCENIC RIVER GENERAL MANAGEMENT PLAN AND DEVELOPMENT
CONCEPT PLAN - DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)

We appreciated the opportunity to review the subject plan and EIS and were impressed with the format and layout of the information. TVA's comments on the plan and EIS follow.

1. Alternative A mentions moving the sanitary facilities outside of the 100-year flood zone, but does not state where these new locations will be or what type of wastewater treatment would be used for treatment of human waste. The surface and groundwater impacts of these facilities should also be addressed. A treatment technology that would result in no discharge should be given strong consideration.
2. A more defined water quality sampling effort should be defined. It would seem reasonable to establish a monitoring plan, decide on the samples that need collecting, the parameters to be analyzed, and establish criteria for these parameters. For example, if sampling for pH, decide on the limits of pH and if the limits are exceeded, what is the cause.
3. We could not find specific projections of the expected increase in visitors to the area which might result from the new and enhanced facilities. The impact from additional traffic, trash and litter, and human waste can not be assessed without these figures. TVA recommends that estimates be made of increased visitor use and that potential impacts be quantified.
4. The source of domestic water supply for proposed facilities should be identified and the impact of developing those supplies needs to be addressed.

RESPONSES

Tennessee Valley Authority

1. Sanitary facilities would be of a no discharge type and any that would be located within the 100-year flood zone would be removed during flood periods, according to the GMP. New types of sanitary facilities (chemical and composting) are being evaluated for efficiency, cost of purchasing, construction and servicing, odor control, ability to withstand vandalism and natural conditions, and aesthetics. Sewer or septic tank systems will not be used because of groundwater impacts and lack of water sources to operate the systems.
2. The details of the monitoring program and the initiation of a Water Resource Management Plan, referenced on pages 16 and 21, must await specific funding. This normally follows the GMP.
3. The facilities and mitigation strategies proposed in the GMP are based on reasonable expectations of visitor use for the various specific sites within the Obed WSR. The discussion on pages 100 to 101 recognizes increased visitation and provides for measures to minimize impacts. The GMP also recognizes the potential for implementing additional controls. Please also see response #1 to the letter from the Environmental Protection Agency.
4. City, county, or well water does not exist at river access sites nor is their provision and use desired at this time. Instead of sanitary facilities that use domestic water systems, self-contained chemical or composting systems will be utilized.

COMMENTS

Mr. W. Thomas Brown
 Page 2
 January 27, 1995

On page 16 reference is made to the RMP, 1993. We could not find this document listed in the Bibliography.

While the Resource Management Plan of 1993 is not the subject of the EIS, TVA supports the stated cooperative efforts on page 21 where the National Park Service will promote a watershed approach to dealing with the broad water quantity and quality issues which impact the ability of the NPS to meet the objectives of the Wild and Scenic River.


On page 101, the EIS refers to the use of alternative paving material where feasible. TVA recommends that every effort be made to use porous pavement and/or gravel surfaces for access roads and parking areas. This would greatly reduce the surface runoff volume and pollutants entering the adjacent streams and help maintain the rustic appearance of the facilities.

5. We noted a lack of discussion on aesthetics and visual issues. This is true especially in light of the fact that the Obed is considered a wild and scenic river. Therefore, we suggest this area be addressed in more detail.

Based upon the environmental impacts of the two courses of action and the environmental consequences of each, TVA favors Alternative A. Alternative A clearly defines the areas that need improving in more detail and states the best course to achieving the improvements. In addition, we favor Lilly Bluff as the overlook site under Alternative A. Construction of visitor facilities there would provide the means to protect and enhance the rare plant communities of the bluff while allowing the casual visitor to experience the Clear Creek gorge.

If you have any questions on the comments, please call Dale V. Wilhelm of my staff at (615) 632-NEPA (6372) in Knoxville, Tennessee.

Sincerely,


 Dale V. Wilhelm for
 Jon H. Loney, Manager
 Environmental Management

RESPONSES

5. Aesthetics and visual issues were a dominant consideration in determining location of development at river access areas, proposed trails, and scenic overlooks. Efforts are being made to minimize visual intrusions. Since aesthetic values are highly subjective and extremely difficult to quantify, numerous field visits and discussions with various user groups provided information in developing the alternatives. We regret that a lack of specific discussion leads the reader to believe the issues were not addressed.

COMMENTS



United States Department of the Interior

BUREAU OF MINES
 Intermountain Field Operations Center
 P.O. Box 25086
 Building 20, Denver Federal Center
 Denver, Colorado 80225

January 18, 1995

Memorandum

To: Regional Director, Southeast Region, National Park Service, Richard B. Russell Federal Building, 75 Spring Street, SW, Suite 1022, Atlanta, Georgia 30303

From: Supervisory Physical Scientist, Intermountain Field Operations Center

Subject: Review of Draft Environmental Impact Statement/General Management Plan/Development Concept Plan for the Obed Wild and Scenic River, Morgan and Cumberland Counties, Tennessee

Personnel of the Intermountain Field Operations Center, Bureau of Mines, reviewed the Draft Environmental Statement (DEIS) for involvement with mineral resources and industry, as you requested. As we understand it, the DEIS pertains to the expansion and management of the Obed Wild and Scenic River area.

The U.S. Bureau of Mines primary concern is potential project impacts to mineral resources, mineral production facilities, and/or potential mineral development. An examination of library and file data, without the benefit of field investigation, revealed that coal, oil and gas, sand and gravel, and sandstone (suitable for use as both dimension stone and crushed stone) occur in the area. Although the document mentioned some mineral resources (p. 67 & 72-75), it failed to identify all mineral resources and evaluate the effects that the proposed management projects and related land withdrawals would have on mineral resources. The Final EIS also should address cumulative effects of continued mineral resources withdrawal.

We appreciate this opportunity to provide comments on the subject document. Our comments are drawn from available information, are provided on a technical assistance basis only, and may not reflect the position of the Department of the Interior.

If you have any questions, please contact Robert Wood at (303) 236-0428, ext. 294.

Sincerely,

Mark H. Hiltbushman
 Mark H. Hiltbushman
 Supervisory Physical Scientist

RESPONSES

United States Department of the Interior, Bureau of Mines

1. Please see change made on page 107.

RESPONSES

Tennessee State Planning Office

No response necessary.

COMMENTS



TENNESSEE STATE PLANNING OFFICE

DON BLINQUIST, GOVERNOR
RICHARD C. LEWIS, EXECUTIVE DIRECTOR
OFFICE OF THE GOVERNOR
SUITE MT. JOHN SEVIER BUILDING
500 CHARLOTTE AVENUE
NASHVILLE, TENNESSEE 37243-4661

January 31, 1994

95-0746

Mr. W. Thomas Brown
U. S. Department of the Interior
75 Spring Street, Southwest
Atlanta, Georgia 30303

CHTN013095-013, General Management Plan/Dev. Concept Plan/Draft Environmental Impact Statement for Obad Wild & Scenic River, TK

Dear Mr. Brown:

In accordance with Presidential Executive Orders 12372 and 12418 and with Gubernatorial Executive Order 58, this office serves as the designated State Clearinghouse for federal activities and grants review.

State and local government evaluation of submitted material has indicated no conflicts with existing or planned activities. Therefore, we are recommending that this proposal be approved based on the descriptive information made available to us. However, should additional information come to the attention of this office, we may wish to comment further.

This letter should be attached to the application and become a permanent part of the project file. Any involved federal agency should respond in writing to this office if there are problems in complying with this approval. The above State Clearinghouse Identification Number should be placed in the appropriate block on the federal application form.

The appropriate funding agency will now be reviewing our recommendation. If we can be of further assistance, please do not hesitate to contact us.

Sincerely,

Charles W. Brown

Charles W. Brown
Director, State Clearinghouse

CWB:mcp

cc: All Development Districts
All Congressional Districts
16-000

RESPONSES

Agricultural Extension Service, University of Tennessee

1. The river segments mentioned on page 51 under "Adjustments Requiring Further Study" are those that became obvious during the planning process. As referenced under the subsection, Obed River and Clear Creek, other "major tributaries" may be appropriate for inclusion in any future study effort, i.e., the list on page 51 was not intended to be exclusive. As legislation may be developed that would authorize additional Wild and Scenic River study for the Obed unit, a list of river segments generally known to possess potential for designation would be identified for study.
2. This option would be seriously considered.
3. The figure shown is a preliminary estimate and would be refined in subsequent programming documents.

COMMENTS

AGRICULTURAL EXTENSION SERVICE
THE UNIVERSITY OF TENNESSEE INSTITUTE OF AGRICULTURE



P.O. Box 325
Warburg, TN 37887
January 6, 1995

National Park Service
Southeast Regional Office
75 Spring Street, Southwest
Atlanta, GA 30303

Dear Regional Director:

I have just finished reviewing the latest version of the Obed Wild & Scenic River, Tennessee General Management Plan; Development Concept Plan; Environmental Impact Statement.

In my opinion--you have done an excellent job. There are, however, four concerns that I would like to express.

1. On page 51 under adjustments requiring further study--I wonder about only studying the possible inclusion of the river and lands along 3.75 miles of the Emory River, between Nemo Bridge and Crooked Fork Creek. What about the possibility of taking in the Emory--all the way to Oakdale, Tennessee? This is a beautiful stretch of river. The town of Oakdale could benefit economically from this inclusion.
2. Secondly, on page 52 under implementation--I strongly support the Park Service purchasing the existing visitor center owned by the City of Warburg. This facility serves as an excellent place to orient people to the river, resources and area.
3. Next, on page 53, under operational cost, I strongly support the addition of enough money & personnel to fully protect and maintain the resource. Is \$476,000 increase enough? If we need more--I support it.

Lastly, I strongly support the development of the Lilly Bluff Overlook at a cost of \$301,100. I think this will allow travelers with "little time" to get a quick interpretation of the resource.

Meanwhile, I hope that you'll carefully consider my concerns and see fit to include my opinions in your plans.

Thank you.

Sincerely,
D. Kelly Ammonett
D. Kelly Ammonett
Extension Leader
Morgan County



DKA/lmm

A State Partner in the Cooperative Extension System
THE UNIVERSITY OF TENNESSEE, U.S. DEPARTMENT OF AGRICULTURE, AND COUNTY GOVERNMENTS COOPERATING
The Agricultural Extension Service offers its programs to all eligible persons regardless of race, color, national origin, sex, age or disability and is an Equal Opportunity Employer.

COMMENTS

East Tennessee Development District

5616 Kingston Pike P.O. Box 19806 Knoxville, TN 37939-2806 (615) 544-6553 FAX 384-5159



December 22, 1994

Mr. W. Thomas Brown
Associate Regional Director
Southeast Region
National Park Service
United States Department of the Interior
75 Spring Street
Atlanta, Georgia 30303

Subject: Review of General Management Plan/Development Concept Plan/Draft Environmental Impact Statement/ Obed Wild and Scenic River, Tennessee

Dear Mr. Brown:

Thank you for sending a copy of the Obed plan for our review and comment.

The East Tennessee Development District has long supported the development of the Obed Wild and Scenic River both from a protection standpoint and as a means of encouraging tourism in Morgan County. Generally, we are very supportive of the proposed plan (alternative A), except that in two matters discussed below we much prefer alternative B.

The two new items under alternative A that we especially support are:

1. The permanent establishment of a visitor center in Warburg. This has been supported by the East Tennessee Development District since the early 1970's; therefore, we were especially pleased when the center was opened in Warburg. We believe a center in or very close to Warburg must become permanent. Warburg is ideal because it is readily accessible and allows visitors to be dispersed from the most accessible point to the various parts of the river system without back-tracking on generally poor roads. Further, it allows those people who would like to spend several days immediate access to motels, restaurants, grocery stores, service stations, etc. prior to exploring the area.
2. The proposal trail system on the north side of the Obed (and loop on the south side of Clear Creek) is highly desirable. This offers the opportunity to hike and view scenic areas without the hunting and closing conflict in the Catcoosa WMA.

The items that we prefer and strongly recommend to keep as currently planned (alternative B) are:

1. The access to Obed Junction. For the very same reason that it is desirable to have the major hiking trail on the north side of the Obed, it is desirable to have access from the north to Obed Junction so as to have an alternative access that doesn't conflict with the

Comments & Responses

RESPONSES

East Tennessee Development District

1. Proposed access to Obed Junction, and to other river access sites, was governed by the application of the area's management objectives. The objectives resulted from a deliberate process that considered the area's legislative purpose and its significance. This is described in the section, "DIRECTION for the PLAN" on page 6. Obed Junction will continue to be a canoe access point, although a more primitive one, with a foot path from the river to parking at the existing paved road.

COMMENTS

RESPONSES

1. management and operation of the Catoosa area. Although much of the boating, railing and canoeing on the Obed occurs during April-May and in the summer following rains, there are times especially in March, when a good access from the north is essential due to the closure of Catoosa. Access from the north would not have to be environmentally damaging-just enough to get somewhat close to the river to put-in or take out. Further, an access here would be helpful to elderly and disabled who wish to visit this more remote part of the river system that was once a river crossing and site of a railroad.

2. The other alternative B item which we prefer and strongly recommend is the road access to the Obed/Clear Creek Junction overlook. The substitution of an overlook at Lily Bluff is, in our opinion, inadequate for the public. We suggest deleting the Lily Bluff alternative A in favor of alternative B. We think if the Wild river is to add significantly in tourism, the general public must be offered the opportunity to view and appreciate the most spectacular scenery. An overlook at the junction will provide a very spectacular view without undue environmental damage. We strongly recommend the original concept which includes a 1.3 mile road, which does not have to be very high grade, to a point close to the overlook above the junction. Perhaps if this is thought to be too intrusive, reduce the length slightly and eliminate the picnic tables and viewing platform.

3. We support the proposed eight boundary adjustments and administrative adjustments shown on page 48, entitled Boundary Adjustments, and in addition the designation of the Emory River to Crooked Fork Creek, Whites Creek and upstream extensions of the Obed and Clear Creek.

We think that some of the parking might be deficient, for example only 4 spaces at Barnett Bridge. Barnett Bridge is a place where more than 4 groups might wish to leave cars for boating and others might wish to swim or picnic. As time goes on, these locations can be further evaluated. We would hope that the NPS would not use marked parking places as a means to restrict usage.

Thank you again for the opportunity to comment.

Yours truly,

Robert E. Freeman
 Robert E. Freeman
 Executive Director

cc: E. Lee Davis, Superintendent
 Tommy Kilby, Morgan County Executive
 Joe Kelley, Unit Manager

2. The District's comment is appreciated; however, analysis of the overlook site, referenced on page 26, considered the points raised and the Lilly Bluff site is preferable.

3. We agree future demand could require additional parking. The discussion on page 32 under "RIVER ACCESS" provides for further analysis.



american whitewater affiliation

Richard R. Hoffman
Access Program Coordinator
8630 Fenton Street, Suite 910
Silver Spring, MD 20910
(301) 589-9453
(301) 589-6121 Fax

January 26, 1995

W. Thomas Brown, Assoc. Regional Director
Southeast Regional Office
National Park Service
75 Spring Street, SW
Atlanta, Georgia 30303

Dear Mr. Brown,

On behalf of the American Whitewater Affiliation (AWA), thank you for the opportunity to comment on the General Management Plan/Development Concept Plan/Environmental Impact Statement (GMP) for the Obed Wild and Scenic River.

The American Whitewater Affiliation is a national organization with over 3800 members and more than 100 canoe club affiliates, representing approximately 30,000 whitewater paddlers. The AWA was organized in 1957 to protect and enhance the recreational enjoyment of whitewater sports in America. We are dedicated to safety, education, and the conservation of America's whitewater resources.

The rivers and streams within the watershed of the Obed-Emory system offer some of the finest whitewater in the entire southeast. Our membership and affiliated clubs are among the most frequent visitors to this area. They are attracted to these rivers by the outstanding recreational experience and because of their outstanding water quality. They are drawn by the opportunity to experience wilderness--a condition that is becoming more rare and thus all the more valuable.

Whitewater rivers are also a rare resource, comprising less than 1 percent of the total number of river miles in the U.S.¹ The state of Tennessee has had the foresight to conserve some of these resources, designating 98 miles of three rivers and tributaries as Wild and Scenic.²

¹ American Whitewater Affiliation, 1990. *Nationwide Whitewater Inventory: A Geographic Information System for Whitewater Rivers in the United States*. Pope Barrow, ed.

² Palmer, T., 1993. *The Wild and Scenic Rivers of America*. Washington, D.C.: Island Press, p. 227.

Executive Office: P.O. Box 85, Phoenicia, NY 12464
(914) 688-5569

COMMENTS

RESPONSES

I. General Comments

The National Park Service (NPS) has done an outstanding job of clearly and thoroughly presenting the information in the GMP. We commend the NPS for providing numerous opportunities for public involvement in the process of writing this GMP.

The AWA strongly supports Alternative A, which is the NPS' proposed course of action. Only this Alternative will fulfill the NPS' role as the steward of a nationally significant river: "to conserve the scenery and the natural and historic objects and the wildlife therein...in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (NPS Organic Act, 16 USC 1).

We fully support the principle that management zones should be based upon natural resources rather than upon land ownership. By doing this, the NPS will be able to manage this area for both visitor experience with resource protection more effectively.

II. Specific Comments

A. Water Resources

The water quality within the Obed-Emory watershed is considered to be among the highest in Tennessee. As stated in the GMP, the quality and quantity of these waters sustains the "outstandingly remarkable"³ values in the Obed WSR and that it is the NPS' duty prevent the degradation of these values.

Maintaining the water quality and quantity flowing through a parcel of land is an extremely difficult task. In Alternative A, the NPS does an excellent job of assessing this problem and planning for the future. We agree that the NPS must address impacts to water quantity and quality that may occur outside of the Wild and Scenic boundary. The GMP states that the construction of reservoirs within the watershed "may significantly reduce the natural variability of streamflows in the Obed WSR and impair water-related resource attributes" (p. 69). In 1993, the AWA voiced opposition to a proposed dam on Clear Creek that would significantly impact the resources in the Obed WSR.

The AWA commends the NPS for addressing issues of water quantity as well as water quality in Alternative A, especially in light of the May 31, 1994 Supreme Court decision (PUD No. 1 of Jefferson County v. Washington Department of Ecology) which recognizes the intrinsic link between water quantity and quality. We strongly support the NPS' program for managing water resources in Alternative A, including a monitoring program to collect baseline data, the creation of a management plan for a comprehensive analysis of

³ The Wild and Scenic Rivers Act (1968) states: "It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable...values."

COMMENTS

the watershed; the reduction of acid drainage and erosion; and working in partnerships with established state and local programs. In particular, we advise the State of Tennessee will classify the Obed, Emory and their tributaries as "Outstanding Natural Resource Waters."

1. In light of the increasing public sentiment to protect the water and the increasing threats to water quantity and quality, we urge the NPS to implement these plans without delay. In addition, we believe that the Management Objective pertaining to water quality that reads: "To achieve and maintain high water quality" should state "the highest water quality."

B. Visitor Use

The NPS' plan to limit development to existing bridge crossings is an excellent idea. The AWA agrees that the most successful management strategy for a wilderness area is one that concentrates use and access to select areas and leaves the rest as wild. The nearby Wild and Scenic Chattooga River does an excellent job of managing only select sites for access and more concentrated use.

1. River Access

The NPS has done a good job of addressing the need to accommodate existing use patterns that are safe and sensitive to the landscape. Local clubs and the AWA can help the NPS with signs that identify areas of particular hazard to whitewater boaters. These signs have been effective on other rivers, such as Pennsylvania's Middle Youghiogeny River.

2. Scenic Overlook

As discussed in Alternative A, we support the development of a single overlook at Lilly Bluff, in lieu of a major overlook planned for the Obed/Clear Creek junction in Alternative B.

C. Boundary Adjustments

The AWA fully supports the boundary adjustments described in Alternative A. Collectively, these additions will help to fill in holes in the fabric of the landscape surrounding this pristine watershed. Plugging loopholes in easements held by the NPS is also necessary. In the near future, we hope that the NPS will look both upstream and downstream for further boundary additions that will enhance the integrity of this area. For example, three outstanding tributaries lie immediately outside of the downstream boundary: Crab Orchard Creek, Crooked Fork and Island Creek, all incredible whitewater runs. Please see the enclosed pages from our Nationwide Whitewater Inventory.

2.

RESPONSES

American Whitewater Affiliation

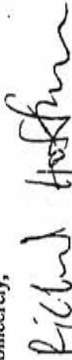
1. Please see the rewording of the management objective, page 10.
2. Please see our response #1 to the Agricultural Extension Service.

COMMENTS

RESPONSES

Once again, we compliment the Park Service on an excellent document. Please feel free to contact our Conservation and Access Office if we may be of any further assistance. Thank you for your time and consideration.

Sincerely,



Richard R. Hoffman
River Access Coordinator

- cc: Superintendent, Obed Wild and Scenic River
Liane B. Russell, Tennessee Citizens for Wilderness Planning
Ron Stewart, AWA Director
Chuck Estes, East Tennessee Whitewater Club
Teresa Gryder
Matthew Shallbetter and Sylvia McClain

Enclosure

COMMENTS

BLUE RIDGE TRAIL RIDERS, INC.
2821 NORWICH COURT
MARYVILLE, TENNESSEE 37803

January 27, 1995

Regional Director
Southeast Regional Office
75 Spring Street, SW
Atlanta, GA 30303

Dear Sir:

We appreciate the opportunity of providing input to the Draft Environmental Impact Statement/General Management Plan/Development Concept Plan for the Obed Wild and Scenic River.

Because of time constraints, we have, at this time, reviewed these documents in a cursory fashion. Obviously, as a horse riding club, we are interested in recreational pursuits involving the horse. We are disappointed to find that at this time no plans are made for horse trails in the Obed. We request that you reconsider recreational opportunities for horse riders. We believe that horse trails can be compatible with Congress' objectives when the Obed was legislated. We would like for you to consider that by providing horse trails in the Obed:

1. The potential for overuse in other areas is lessened. We expect that in the future as its popularity increases, Big South Fork trails will become more heavily used than at the present. By spreading this use, both areas will benefit.
2. You provide trail access for horse recreationalists that accommodates a shorter driving distance and a shorter timetable to reach the trails.
3. You will have provided opportunities for senior citizens to enjoy the beauty of the Obed who otherwise would not be able to do so by hiking.

We further recommend that in conjunction with allowing horse trails that the Park Service:

1. Work with horse riders, along with other users, to develop an educational program on interaction with each other and on protecting the environment.

RESPONSES

Blue Ridge Trail Riders, Inc.

We acknowledge the concern of the equestrian community. Please see our response #1 to the letter from the Environmental Protection Agency.

RESPONSES

COMMENTS

2. Develop a well-coordinated volunteer program where trail recreationalists can assist the Obed in the maintenance of trails and in other means available to lessen impact on the environment.

We believe that trails recommended (ridgeline trails) are ecologically compatible with horses. We feel that it is possible other proposed activities, such as primitive camping, would conceivably have more impact on resources than horses. Therefore, we request that a closer look be taken at horse activities in the Obed.

Thank you for your consideration. We look forward to your reply.

Sincerely,

BLUE RIDGE TRAIL RIDERS

Karen Whitehead
Karen Whitehead, President

CC: Jim Rule, 256 Old Gobey Road, Wartburg, TN 37887

COMMENTS

East Tennessee Whitewater Club
P. O. Box 5774
Oak Ridge, Tennessee 37831-5774

January 27, 1995

Mr. W. Thomas Brown
Southeast Regional Office
National Park Service
75 Spring Street, SW
Atlanta, Georgia 30303

Dear Mr. Brown,

Comments on the Obed Wild and Scenic River General Management Plan

Let me begin by stating that it was a pleasure to serve on the workgroup which assisted in developing the scope and guiding principals of the general management plan. The Park Service staff involved were extremely professional and represented the best in public service. To insure that the irreplaceable resources of the Obed system are adequately managed and protected, we support the proposal in Alternative A which calls for increasing the Obed River staff. This will more appropriately provide the administrative, technical, and security needs of the public.

We vigorously support Alternative A which was the Park Service's preferred course. We believe that this alternative represents far and away the best selection in protecting the resources of the Obed River. In particular, we believe the use of management zones was helpful in limiting development to appropriate areas and insuring that wild areas are protected. We strongly support limiting any development in the wild areas to only spots with existing bridges. We support having only trails to access locations like Obed Junction, Canoe Hole, and Norris Ford. These areas have received a lot of damage by four-wheel drive vehicles and human trash. The roads leading to them should be gated.

The decision on the development of an overlook in the Obed River system has been a difficult process. We believe the location at the bluff above Lilly Bridge in Alternative A is the best choice. This meets a management principal of limiting development to areas near an existing river crossing. Also, the overlook at Lilly Bridge is one of the best in the river system. It offers a spectacular view of Clear Creek and imposes minimum impact on the environment. We do not want to see a developed overlook at the junction of the Obed River and Clear Creek. This area is very erodible and should not be extensively developed. Also, an overlook at Clear Creek junction would be visually intrusive, especially to boaters, in an area of the Obed system that has a extreme sense of remoteness part.

RESPONSES

East Tennessee Whitewater Club

COMMENTS

We also support the boundary adjustments included in Alternative A. This includes acquiring 25 acres at Muddy Branch, White Creek, Little Clear Creek, and Melton Mill Branch. Also, the Park Service should acquire the 61 acres on the north side of the Obed River between the Daddys Creek confluence and Clear Creek that was inadvertently omitted when the original boundary was set. Land (about 6 acres) should also be acquired to allow completion of a trail corridor between the Obed River and Clear Creek.

Alternative A recognizes the mounting impacts of lakes and reservoirs that have increased in the Obed River system. These reservoirs pose a serious potential water quantity and quality problem for the Obed system. We believe the recommendation in Alternative A to establish basinwide and regional water resource planning is essential to long-term protection of water quality in the Obed system. A healthy Obed River system is dependent on great water quality. To help insure this, we recommend classifying the Obed river and its tributaries as Outstanding National Resource Waters.

Finally, we support the studies recommended in Alternative A which would consider adding White Creek and portions of the upper Obed River and Clear Creek into wild and scenic protection. However, the recommendation in Alternative A does not go far enough for the lower Emory River. We believe the Emory should be studied as a scenic and recreational river classification from Nemo Bridge to the Oakdale Bridge. This is a very scenic section of river and has the potential to provide a lot of quality recreational opportunities. It is primarily a Class II section and is excellent for beginners and training trips. Also, Alternative A should recommend studying Island Creek as a wild and scenic river. Island Creek has exceptional water quality, scenery, and whitewater. It is also already in public ownership (Catoosa Wildlife Management Area). Consideration should also be given to studying Crab Orchard Creek and Crooked Fork Creek. These are very remote and have excellent scenery and whitewater.

In summary, we are very pleased with Alternative A and encourage you to include our recommendations to improve it. Again, we appreciate the opportunity to be involved in this very important planning effort and would like to be involved in future actions impacting the Obed River system.

Sincerely,



Chuck Estes
Conservation Chairperson
East Tennessee Whitewater Club

RESPONSES

1. Please see our response #1 to the Agricultural Extension Service.

COMMENTS

TENNESSEE CITIZENS for WILDERNESS PLANNING

For The Preservation and Enjoyment of Our Wild Lands and Waters

W. Thomas Brown, Assoc. Regional Director
 Southeast Regional Office
 NATIONAL PARK SERVICE
 75 Spring Street, SW
 Atlanta, Georgia 30303

130 Tabor Road
 Oak Ridge, Tenn. 37830
 Telephone 615-482-2153

January 15, 1995

Dear Mr. Brown,

Tennessee Citizens for Wilderness Planning (TCWP) wishes to comment on the Obed Wild & Scenic River, Tennessee, General Management Plan/Development Concept Plan/Environmental Impact Statement (to be abbreviated GMP). We ask that you make these comments part of the official record.

TCWP has a strong and abiding interest in preserving the Obed WSR. Saving the Obed from a dam proposal was the chief objective for which TCWP was formed in 1966, and the subsequent inclusion of portions of the Obed and its chief tributaries in the National Wild & Scenic Rivers System was a hard-won achievement for our organization.

We commend the National Park Service (NPS) for the highly professional and thorough manner in which the Obed GMP was produced, and for the numerous opportunities for public input that were provided and in which we participated. The resulting well-organized 161-page document contains a great deal of factual material, both from the literature (documented by a long bibliography) and from pertinent *ad hoc* studies. The text is very clear and well-formatted, and the 22 maps and illustrations are informative and attractive.

We wish to give strong support to Alternative A, which constitutes NPS' proposed course of action. Underlying this alternative is a management-zone system based on resource protection and visitor experience (as opposed to Alternative B, where management zones are based primarily on land-ownership patterns). The two management zones designated are the Wild Zone and the Development Zone. We strongly support the policy that, within the Wild Zone, *development must be limited to existing bridge crossing areas.*

Various specifics under Alternative A merit special support.

1. We applaud the single developed overlook, located at Lilly Bluff. This decision is supported by the Wild Zone criteria of limiting development to areas of existing bridge crossings (in this case, Lilly Bridge), as well as by the results of the special study reported in Appendix C of the GMP. (By contrast, Alternative B would build a major developed overlook at the Obed/Clear Creek junction, which is *not* a bridge-crossing area and which would result in a visual intrusion from the river for boaters and hikers.)

In view of the botanical investigation of overlook sites (Appendix G), which cautions against intrusions into the southern portion of Lilly Bluff, we urge NPS to exert very special care in its boardwalk design and to take all possible measures to stop the presently occurring damages from motorized vehicles that illegally access the bluff.

2. We applaud making Obed Junction and Norris Ford accessible by trail, rather than by motorized vehicles.

RESPONSES

Tennessee Citizens for Wilderness Planning

1. We agree with the concern for the southern portion of Lilly Bluff. Although a specific boardwalk design has not been chosen, we intend it to be one that has the least impact botanically, physically, and aesthetically. Also, proposed staffing (page 46) calls for the addition of a Resource Management Specialist at Obed WSR to implement and coordinate resource management strategies (page 102, right column) as well as additional law enforcement personnel.

COMMENTS

3. We support the boundary adjustments that are proposed under Alternative A, each of which would add critical lands to the Wild & Scenic River area, as follows (note that of the 7 items, only two -- b and g -- are proposed in Alternative B):
 - (a) The mouths of 4 tributaries (Muddy Branch, White Creek, Little Clear Creek, Melton Mill Branch) -- a total of 25 acres.
 - (b) A stretch on the north side of the Obed (between Daddys and Clear Creek confluences) that was inadvertently omitted from the original boundary -- a total of 61 acres.
 - (c) Additional land at Lilly Bluff -- about 20 acres.
 - (d) To complete a trail corridor between Obed and Clear Creek -- 6 acres.
 - (e) To extend the boundary upstream to Adams Bridge on the Obed -- 95 acres.
 - (f) To extend the boundary 6 miles upstream on Daddys Creek -- no purchase required (land is already within Catcoosa).
 - (g) To buy parcels in Wartburg for administrative purposes -- 1+ acres.

We urge quick administrative action on the four items (a-d) that could be accomplished without additional legislation, as well as careful consideration of how best to accomplish the objectives (items e-g) that require legislation (e.g. by making a package with item 4., below).
4. We strongly support studies that might clear the way for further boundary adjustments, namely additions of segments of the Emory, White Creek, and upstream portions of Obed and Clear Creek. In view of the rapidly increasing threats to the upper watershed and of the growing public sentiment in favor of protecting the Obed WSR, such studies need to be done without delay.
5. We were very pleased to find that Alternative A of the GMP places a good deal more emphasis than had been given in an earlier draft (10/93) on the need to maintain water *quantity* as well as quality (e.g., p.16, p.68-69, p.100). The GMP provides more specifics concerning the threats by documenting 42 reservoirs in the watershed that are larger than 2 acres, including 15 that are more than 50 acre-feet in size. Alternative A of the GMP wisely recommends basinwide/regional comprehensive water-resource planning. It also urges that information be obtained to determine water rights for the Obed WSR. Alternative B does not address these matters.

A question arises concerning terminology. The achievement and maintenance of "natural stream flows" is listed among the Management Objectives (p.10, L). We wonder whether the adjective "natural" might not simply be taken to refer to seasonal variations, and whether the condition we are attempting to ensure is best described by "historical stream flows."

6. We strongly support changing the language of both existing and new easements (pages v and 47) so as to do away with current loopholes that are damaging the resource.
7. We support several of the GMP's proposals to diminish the damage from motorized vehicles, specifically: (a) obliterating roadways created by ATVs, etc. in the Wild Zone and, in some cases, replacing them with hiking trails (p.35); (b) placing future parking outside the gorge or outside the WSR boundary (p.32).
8. We support the proposed increases in the staff, which is currently totally inadequate at five.. While Alternative A proposes slightly larger staff increases than does Alternative B, it should be noted that A would actually be *less* costly than B with respect to construction.

There are a few features of the GMP that we feel could be improved.

1. More stringent objectives should be stated for water quality. The Management Objective pertaining to Water Quality currently reads: "To achieve and maintain high water quality .." (a) We would advocate the "highest" water quality. (b) If this is to be achieved under State

RESPONSES

2. We agree that "natural stream flows" is ambiguous; however, we also believe "historical stream flows" does not adequately capture the intent since the phrase has different meanings in different contexts. Therefore, we have reworded the management objective and simply used "a free flowing condition" since the phrase is used in the legislation and the remainder of the statement (as reworded for further clarification) identifies the desired end result and provides better direction for water management strategies.
3. Please see the reworded management objective for water quality. Also, exploring with the State the Outstanding Natural Resource Water (ONRW) designation of tributaries would be included in any discussions on this subject. In order for the watershed to be designated unsuitable for surface mining, the Federal government would likely have to purchase the existing surface mining rights for approximately 2920 acres that have been permitted within the watershed. The feasibility of doing this has not been investigated and the fact that this strategy does not appear in the GMP does not preclude its use in the future.

RESPONSES

4. We agree the impact on local tax revenues would not be large in either alternative. Unfortunately, it appears emphasized since it was a specific, easily identified difference.
5. We agree with this comment.
6. Please see our response to Mr. Doug Sanders.
7. This material was omitted in order to emphasize the use and management of easements, as discussed on page 47. Attempting to amend the Wild and Scenic Rivers Act was not seen as a practical solution at this time. The fact that this strategy does not appear in the GMP does not preclude its use in the future should conditions warrant.
8. We concur with most of the corrections noted.

COMMENTS

3. law, NPS should formally urge the State of Tennessee to classify the Obed and its tributaries as "Outstanding National Resource Waters." (c) NPS should also approach the Office of Surface Mining with a proposal to designating the watershed as unsuitable for surface mining under Section 522 of the Federal Surface Mining Act of 1977.
4. We feel that the document places too much emphasis (e.g., pp. vi, 108) on county-tax reductions stemming from new fee acquisitions proposed under Alternative A. In actual fact, the difference between A and B acquisitions amounts to less than 150 acres, translating into a tax loss of probably less than \$2,000/year. The county could easily recoup this small amount from increases in property values outside the WSR boundary.
5. In the Summary (p. v, right-hand column), the statement "One developed overlook would be located near Lilly Bridge ..." is potentially misleading, since it implies that other developed overlooks would be located elsewhere. This summary statement should be brought in conformity with the one on p. 26 (left-hand column), namely, "A single, developed overlook would be located at Lilly Bridge..."
6. We are still concerned about too much trail development within the gorge. A major portion of the linear trail from Lilly to Nemo (p. 31) should be upland.
7. The earlier draft of October 1993 (pp. 24-25) suggested actions to do away with the current land-acquisition limitations. This discussion has been omitted from the GMP.

We thank you for the opportunity to comment on this fine document.

Sincerely,

Liane B. Russell
Liane B. Russell, for the TCWP Board

8. We suggest a few non-substantive changes or corrections pp.29 and 43 need to be switched p.46, left-hand column, 1st para., next to last line; substitute "Alternative A" for "this alternative" (which is ambiguous)
In Appendix I, the list of proposed dams excludes the one for upper Clear Creek p.31 (L, last line) "need" in lieu of "needs"
p.31 (R, mid): "between Devils Breakfast Table and ?"
p.32 (L, para 5) Should read: "Each site would remain virtually undeveloped containing, at most, ..."
p.69 (L, middle of para.3): "... agricultural water supplies; however ..."
p.69 (L, end of para.3): The number 14 does not agree with Appendix I -- should be 15 plus 1-2 proposed.
p.69 (R, Line 8): "its" in lieu of "it's"

COMMENTS

TENNESSEE CITIZENS for WILDERNESS PLANNING

For The Preservation and Enjoyment of Our Wild Lands and Waters

W. Thomas Brown, Assoc. Regional Director
Southeast Regional Office
NATIONAL PARK SERVICE
75 Spring Street, SW
Atlanta, Georgia 30303

130 Tabor Road
Oak Ridge, Tenn. 37830
Telephone 615-482-2153

January 21, 1995

Dear Mr. Brown,

The following is an addendum to the comments we submitted 1/15/95 on the Obed Wild & Scenic River, Tennessee, General Management Plan/Development Concept Plan/Environmental Impact Statement.

We urge that the list of boundary adjustments currently proposed under Alternative A be expanded to include two parcels totaling approximately 97 acres to the south and southwest of Lilly Bluff. A significant portion of the approximately 20-acre Lilly Bluff addition that is presently included in Alternative A will be taken up by parking and access road. The additional 97 acres are needed for trail lay-out and buffer.

We thank you for the opportunity to augment our original comments.

Sincerely,

Liane B. Russell

Liane B. Russell, for the TCWP Board

RESPONSES

Tennessee Citizens for Wilderness Planning

- 9. The acreage reflected in the GMP is a minimal figure. If the landowner is willing to sell additional land, it would be beneficial for resource protection and the visitor experience. This would be dealt with specifically in the park's Land Protection Plan.

RESPONSES

Tennessee Trails Association

No response necessary.

COMMENTS



TENNESSEE TRAILS ASSOCIATION
INC.

P.O. Box 41446
Nashville, Tennessee 37204

January 6, 1995

Mr. W. Thomas Brown
Associate Regional Director
National Park Service

Dear Mr. Brown,

Tennessee Trails Association wants to take this opportunity to comment on the General Management Plan and Environmental Impact Statement for the Obed Wild and Scenic River of Tennessee and the Cumberland Trail. TTA's objectives are to promote, construct, and maintain a state-wide system of hiking trails, and to work for the conservation of natural resources inherent to this objective. We have reviewed both Alternative's A and B of the Management Plan and believe that Alternative A is the correct path and meets well with our own objectives. Specifically, we are impressed with the wide range of trails, from the fully accessible Lilly Bluff Boardwalk, to the 20-mile long distance loop within the confines of the Obed River and Clear Creek.

TTA has been a sponsor of the Cumberland Trail, which originated in 1969 and is to wind its way, north to south, along the eastern edge of the Cumberland Plateau. In fact, an original section of the C.T. was to pass through the Catoosa WMA; this being referred to in the Management Plan. While the State of Tennessee's interest and funding for the project has waned in recent years, TTA has continued to maintain Section 5 of the C.T. and hope for a revival of interest. We will be hosting a gathering on February 25, at 7 p.m., at Cumberland Mountain State Park in order to discuss the C.T. issue and form a Steering Committee, with immediate goals of accessing the need and possibilities for the C.T. Much interest, including the Obed WSR and the push for the Finney River as a WSR, has led us to believe now is a good time to explore the issue. We wish to invite yourself or a representative of the National Park Service to this meeting, or at the very least consider commenting on this issue.

TTA is willing to offer assistance in your work on the Obed WSR, whether this be through volunteers or the dissemination of information through our newsletter. Our membership is over 500 strong and very active. We are also looking forward to working with the NPS concerning the Cumberland Trail and are asking for your support on this issue. Comments and questions are welcome.

Sincerely,

Rob Weber
President, TTA
269 Harpeth View Trail
Kingston Springs, Tn 37082
615-952-2949

Objective: To promote, construct, and maintain a state-wide system of hiking trails, and to work for the conservation of natural resources inherent to this objective.

Sponsor for the Cumberland Trail

COMMENTS

3 Feb 1995

W. Thomas Brown, Assoc. Regional Director
 Southeast Regional Office
 National Park Service
 75 Spring Street SW
 Atlanta, GA 30303

Dear Mr. Brown:

At our January meeting the Fairfield Glade Garden Club members voted to support the following points regarding the Obed Wild & Scenic River, Tennessee, General Management Plan/Development Concept Plan/Environmental Impact Statement. Our members strongly support the many good features of the plan and would urge strengthening modifications where they seem appropriate.

We commend NPS for a very professional and thorough job in producing this Obed GMP. We also support Alternative A based on resource protection and visitor experience. Our support is for a single developed overlook which would be located at Lilly Bluff and planning for the Obed Junction and Norris Ford to be accessible by trail, rather than by motorized vehicles. We also would support setting more stringent objectives for water quality to improve this GMP.

Enclosed are the signatures of those Fairfield Glade Garden Club members who attended our January meeting and support the above points.

Our club is very interested in this GMP and if we can provide additional support please contact us at my address.

Sincerely,

Carol Degenkolb

Carol Degenkolb
 116 Knollwood Lane
 Fairfield Glade, TN 38558

RESPONSES

Fairfield Glade Garden Club, Carol Degenkolb

1. Please see the reworded management objective for water quality on page 10 and our response #3 to the Tennessee Citizens for Wilderness Planning.

RESPONSES

COMMENTS

Fairfield Glade Garden Club Members

Supporting

the

Obel G.M.P

Judy Walker	16 Taylor St Fairfield Glade, TN	38558
Walter Hutchinson	133 Sycamore Lane, Fairfield Glade, TN	38558
Becky Dwyer	118 Ashburn Rd, Fairfield Glade, TN	38558
Nitty Thurman	237 S. George Dr, Fairfield Glade, TN	38558
Ellen Amick	17 Lake Forest Dr, Fairfield Glade, TN	38558
Jan Hammett	309 Lakeside Dr, Fairfield Glade, TN	38558
Annelle Thompson	221 Ashburn Dr, Fairfield Glade, TN	38558
Mary Moritt	70 Box 1907, Fairfield Glade, TN	38558
Lain Cross	115 Lakeside Dr, Fairfield Glade, TN	38558
Jane S. Phipps	12 Lake Forest Dr, Fairfield Glade, TN	38558
Pauline Howell	568 Marmaduke Dr, Fairfield Glade, TN	38558
5944 SENET	148 ST GEORGE DR, FAIRFIELD GLADE TN	38558
Buddy Shelby	111 Kings Lane, Fairfield Glade, TN	38558
Paul Stovall	133 Lakeside Dr, Fairfield Glade, TN	38558
Marquet Bean	144 St George Dr, Fairfield Glade, TN	38558
Paula Smith	104 Bellvue Lane, Fairfield Glade, TN	38558
John Franklyn	109 Eagle Ln, Fairfield Glade, TN	38558
Cheryl Chumley	123 Rutgers Ave, Fairfield Glade, TN	38558
Lyndie Dandridge	161 Glenwood Dr	38558
Pat Bonnett	141 Ashburn Ave, Fairfield Glade, TN	38558
Alan Bonman	19 Cloverdale, Fairfield Glade, TN	38558
Arnee Corby	171 Lakeside Dr, Fairfield Glade, TN	38558
Wynne Moplin	107 Myford Terrace, Fairfield Glade, TN	38558
Robert McConick	104 Lakeside Dr, Fairfield Glade, TN	38558
Wynne Depewick	108 Hilltop Terrace, Fairfield Glade, TN	38558
Wynne Depewick	189 Lakeside Dr, Fairfield Glade, TN	38558
Patricia Muehle	103 Lakeside Dr, Fairfield Glade, TN	38558
Rae Hoyer	236 Lakeside Inve, Fairfield Glade, TN	38558

RESPONSES

COMMENTS

Dorethy Taylor	137 Lisa Ln. Fairfield Glade Tn.	38558
Heidi SCHMIDT	143 -15A FAIRFIELD TN	38558
Gene Johnson	45 Kingswood Ln. FFG	38578
Paula Clark	P.O. BOX 1544 FFG	38558
Steve Johnson	109 Sifford Trl. "	38558
Samuel Johnson	116 Kingswood Ln. Fairfield Glade	38558
Marion Johnson	103 Kingswood Ln. FFG	38558
Ann Perry	272 Sifford Trl. FFG	38558
Marilyn Buckley	159 Matheson Lane FFG.	38558

COMMENTS

Clear Creek Campsites, Inc.
 Rt. 1 Box 481
 Clarkrange, Tn. 38553
 12-27-1994

Regional Director
 Southeast Regional Office
 75 Spring Street SW
 Atlanta, GA 30303

Dear Regional Director:

I have recently received a copy of the Obad Wild and Scenic River Tennessee general management plan and draft Environmental Impact Statement.

My objections are to be found on the map adjacent to page 72. Note the blue circle representing Major Impoundments placed at the headwaters of Clear Creek.

This is a proposed dam site by the Catoosa Utilities District. There is great opposition to this proposed dam. Clear Creek Campsites is located along the banks of Clear Creek and will have a major impact by this dam.

I would like to know why this designation has been made on your map? Are you telling me there is a foregone conclusion of this dam being implemented? They haven't even applied for a permit. They have been ordered to do an environmental impact statement. This has not begun.

I do not believe this impoundment district should be marked on you map. The fight for Clear Creek is far from its conclusion.

Also on the same map you show a major construction and development area on the south side of hwy. 62 and rt. 127, and also one south of Clear Creek bridge extending 4 miles along 127 through Rinnie community. What major development do you know of I do not? Other than a gas station and a few businesses on the south east corner of the intersection of 62 and 127, there is no development.

I would very much like to be enlightened.

Sincerely,

Marlene Bishop

Marlene Bishop, owner
 Clear Creek Campsites, Inc.

cc: Kathrynne Ross

RESPONSES

Bishop, Marlene

1. The designation referred to on the Water Quality Map represents the location of Caryonah Lake (probably not a "major" impoundment). This lake is near the dam site proposed by the Catoosa Utility District.
2. The designation was loosely applied to these areas and was particularly inappropriate along Highway 127 in the Rinnie community.

COMMENTS

RESPONSES

OLIVIA
RUSSELL

February 22, 1995

Mr. W. Thomas Brown
Associate Regional Director
National Park Service
75 Spring Street
Atlanta, Georgia 30303

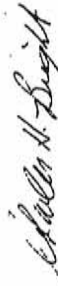
Dear Mr. Brown:

I spend a lot of time outdoors in Tennessee hunting, camping and canoeing. I am especially fond of the Obed-Emory watershed and the surrounding area. I have a lot of interest in the "Obed Wild & Scenic River, General Management Concept Plan and Environmental Impact Statement."

I have scanned (I admit that I have not studied) the Plan. The plan is very professional and though, I support "Alternative A." I support alternatives that do less construction, especially bridge building and developed overlooks. I support boundary adjustments advocated. If possible I would like to see the boundaries extended to upstream portions of the Obed and especially Clear Creek. Clear Creek is the proposed site of a dam and I am opposed to the dam.

If there is anything else I can do to support "Alternative A" please contact me. Thank you for your time.

Sincerely,



Charles H. Bright
President

cc: Lee Russell, Friends of the Obed Network

Bright, Charles

No response necessary.

RESPONSES

Brown, Bob

COMMENTS

Bob Brown
 123 Blackburn Avenue
 Nashville, TN 37205

January 6, 1995

Mr. W. Thomas Brown
 National Park Service
 Southeast Regional Office
 75 Spring Street, SW
 Atlanta, GA 30303

Dear Mr. Brown:

Thank you for two copies of the draft of the General Management Plan/Development Concept Plan for the Obed Wild and Scenic River, one of which I forwarded to Robert Weber, President of the Tennessee Trails Association. I want to express my strong support for Alternative A of the plan.

As a trustee of The Nature Conservancy, Tennessee Chapter, I feel that several of the Alternative A proposals are of critical importance in view of the rapid pace of development in the Obed River watershed. These include expanded monitoring of the Obed WSR waters and preparation of a water resources management plan, cooperative efforts leading to a watershed management program, and the addition of at least one resource management specialist to the WSR staff.

As you may know, The Nature Conservancy, in partnership with U.S. Fish and Wildlife Service, Tennessee Wildlife Resources Agency, and other agencies, is in the fourth year of a cooperative conservation initiative in the Clinch River watershed in Virginia and Tennessee. Perhaps TNC staffers' experiences there could be helpful to those planning the Obed watershed program.

I also strongly endorse the plan for long distance hiking trails linking Nemo and Lilly bridges and looping along and between the Obed and Clear Creek gorges. As editor of the 4th edition of Evan Means' TENNESSEE TRAILS (to be released by Pequot Press next month) I included a summary of the plan as described to me last year by Patricia Trap and Robert Turan, so I hope for an early start toward its implementation.

Finally, as a past president of the Tennessee Trails Association and still its Cumberland Trail Chairman, I can say that TTA remains keenly interested in extension of the Cumberland State Scenic Trail section 4 up the Obed to Daddy's Creek and, eventually, up Daddy's Creek to the Catoosa WMA boundary. I am sure TTA volunteers can help implement the proposed Obed WSR trail plan, and should extension of the Cumberland Trail again be considered, TTA would probably accept some responsibility for its ongoing maintenance.

COMMENTS

Page Two

TTA was organized in 1968 to promote a statewide system of hiking, horse, and bicycle trails and to create the Cumberland Trail (CT) extending from Cumberland Gap to Prentice Cooper State Forest as a prototype State Scenic Trail. By the end of 1971 TTA volunteers had secured verbal easements, cleared, and blazed over 40 miles of the CT including sections from Cumberland Gap to Baptist Gap in Claiborne County, from Lake City to Poplar Creek Gap near Oliver Springs, along Island Creek in Catocosa WMA, and across Haley, Black and Brady Mountains in Cumberland County. By 1976 TTA volunteers in Chattanooga had completed a 3.5 mile section from Signal Point National Military Park to the Prentice Cooper State Forest boundary and by 1979 had extended it with State Forestry Division help and guidance another 7.5 miles.

After two years of effort TTA achieved in 1971 enactment of the Tennessee Trails System Act. It named seven State Scenic Trails, including the Cumberland Trail, all designated for hiking use only (except for hiking/horse use on the Natchez Trace Trail). The State Department of Conservation was directed by the Act to create and manage these trails with assistance from TTA and other volunteers.

In 1981, when federal funds for trail building became available, Tennessee DOC Department of Parks and Recreation started building CT Sections 1, 2 and 3 from Cumberland Gap to Oliver Springs, some of which TTA had opened a decade earlier. These sections were completed by 1986 and managed by State Parks until mid-1991 when all operating funds for the CT were eliminated in state budget cutbacks.

Although CT Sections 1, 2 and 3 have thus been in effect, abandoned, CT Section 5 in Cumberland County continues to be periodically cleared and reblazed by TTA and youngsters from Camp E - Sun-Alee in Deer Lodge, and CT Section 9 in Marion and Hamilton Counties is maintained by the Tennessee River Gorge Trust (TRGT) and the State Forestry Division.

All this history is recited for two reasons. First, on page 91 the draft erroneously states that the CT was "originally organized and maintained by the Department of Conservation..." and later "adopted" by TTA, whereas actually the reverse is true. Second, and more important, many (including TTA, TRGT, Prentice Cooper Forest Manager Bob Campbell, and Cumberland Gap NHP superintendent Charles Vial) believe the CT is still a viable concept with unique scenic and historic values of national significance (see enclosures).

I hope these comments are useful. Please call on me if I can help (615-352-7474).

Sincerely,



Bob Brown

RESPONSES

1. The background of the Tennessee Trails Association's involvement with the Cumberland Trail was enlightening and encouraging. Please see the changes to the text on page 56, right column, paragraph 3; page 88, left column, paragraph 3; and page 91, left column, paragraph 1.

COMMENTS

January 15, 1995

Regional Director, Southeast Region
National Park Service
75 Spring Street
Atlanta, Georgia 30303

I have reviewed the *Draft Environmental Impact Statement/General Management Plan/Development Concept Plan* for the Obed Wild and Scenic River. The compilers and writers should be congratulated on a job well done.

With regard to the preferred course of action (Alternative A), I support the 30 miles of new hiking trails. These proposed trails appear to be well-conceived and would enhance the interpretive and recreational opportunities available in this National Park System unit.

While development of the Cumberland State Scenic Trail is de-emphasized under Alternative A, this trail should not be abandoned. A scenic stand-alone segment of the trail on public lands may be valuable in its own right, regardless of the status of the trail north and south of the park on private lands. Segments of the Cumberland Trail on public lands may be easier to support, maintain, and sustain than those that cross small private holdings. I am happy to see that Alternative A does not abandon the Cumberland Trail concept.

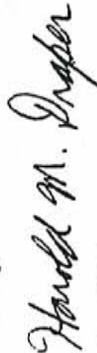
In the document, comparison of the two alternatives is made somewhat more difficult by the smaller amount of detail given concerning Alternative B (Existing Course). For example, maps of trails and other facilities proposed in Alternative B are not provided. However, this is not an important problem with the document, because it is apparent in the comparison chart what the differences between the two alternatives are.

The Management Zones map on page 17, the Long Distance Trails map on page 33, the Boundary Adjustments map on page 49, and the Water Quality Impacts map on page 73 show a state highway 4252. Signs currently on this road designate it as state highway 298.

The reader might be helped if the map of river access sites, now on page 87, were moved earlier in the document, since there is much discussion of Adams Bridge, Antioch Bridge, and Lavender Bridge, although it is not stated where they are located until this point.

Regardless of the alternative chosen, I support additional hiking trails for this park. Once the plan is in place, I would be interested in NPS volunteer opportunities for trail construction and maintenance.

Sincerely,



Harold M. Draper
4907 Shannon Lane
Knoxville, Tennessee 37918
(615) 689-7757

RESPONSES

Draper, Harold

1. Correction noted but it was infeasible to reprint the maps.

COMMENTS

Dr. Sidney W. Jones
Route 1 Box 525
Clarkrange, TN 38553

January 3, 1995

Superintendent
Obed Wild and Scenic River
P.O. Box 429
Wartburg, TN 37887

Dear OWSR Superintendent:

I have had the opportunity to review the General Management Plan/ Development Concept Plan/ Environmental Impact Statement for the Obed Wild and Scenic River. In my view, the proposed alternative represents a significant improvement over alternative B in that current use patterns will be better preserved and less intrusive construction will be required. It would seem desirable, however, to modify alternative A to:

1. (1) Allow more flexibility in proposed trail construction activities so that any areas that have endangered species or sensitive ecosystems could be avoided. As noted on page 22 of the Management Plan/EIS, insufficient data are available to protect biodiversity at the present time. I have personally observed several plant species in the Clear Creek watershed west of the OWSR boundary that were not listed in the reports of Schmalzer and DeSelm or Risk referenced in the Management Plan/EIS. These include *Cleistes divaricata*, *Castilleja coccinea*, *Quercus macrocarpa*, and an unidentified azalea that is neither *Rhododendron cumberlandense*, *nudiflorum*, or *arborescens*. Before trail building is undertaken in areas that are currently inaccessible except by river or rigorous off-trail hiking, the potentially impacted areas should be carefully studied. Trail building would allow easier access to plant collectors or poachers. Some parts of these river gorges are returning to true wilderness conditions, and should be preserved in that manner.
2. (2) Allow greater flexibility for area residents to continue current use practices. Unless ecosystems are threatened, land use restrictions should be slowly phased in on areas now receiving significant recreational use by ATVs to maintain good will between the park service and area residents. This is especially true where the OWSR corridor intersects ATV trails that were in use long before the park acquired these properties. As stated on page 89 of the Management Plan/EIS, heavy resource damage has already occurred in most of these areas, and little will be accomplished by the immediate imposition of severe land use restrictions.
3. (3) Shift some financial resources from trail and facility construction to land acquisitions. Significant expenditures are planned for trail and facility construction, while future land acquisition plans appear to be minimal. The specific boundary adjustments proposed in the Management Plan/EIS seem to be for access or for cosmetic purposes. Future land

RESPONSES

Jones, Sidney

1. Please see our response to Mr. Doug Sanders.
2. Enforcement of any use restrictions will continue to be based on a variety of factors, including resource impacts, threats to visitor experience and safety, and actual violations of law. Availability of National Park Service personnel would be another key factor. A transition period of educating users to any new level of restriction would precede enforcement.
3. The goal of making strategic expenditures of limited funding is one for which we continually strive. The situation is complicated because of multiple funding sources and allowable project types. For instance, all land acquisition by the National Park Service is funded from Congressional appropriations from the Land and Water Conservation Fund, established by Congress in 1965 as the fund source for land acquisition by several Federal agencies. The proposed administrative boundary adjustments may appear to be relatively inconsequential, but they constitute strategic, allowable adjustments without additional Congressional authority.

COMMENTS

3. acquisitions may be necessary in some cases to protect water quality, flora, or fauna. Where possible, construction of trails and facilities should be undertaken with the help of volunteers, and costs kept low. If the savings could be diverted to boundary expansions or projects to protect or improve water quality, such as reclamation of abandoned mines. Unless funds are likely to be available from other sources for substantial land purchases, boundary expansions should be carefully targeted toward those areas which will help to preserve the water quality of the streams and the unique ecosystems of the OWSR. Land acquisitions should proceed, however, only when the landowner is willing to sell.

4. (4) Extend, unless this is already the intent of paragraph A.1.c of Article II of this document, the Memorandum of Understanding between TWRA and the park service (Appendix B of the Management Plan/EIS) so that additional portions of the Obed River system that are currently a part of Catoosa Wildlife Management Area but not specified in Title III of Public Law 94-486, will be managed in accordance with the Wild and Scenic Rivers Act. An example would be the southern half of the Clear Creek gorge between the Morgan County/Fentress County line and the confluence of No-business Creek, which is outside the OWSR boundary and might not be considered a tributary.

Sincerely,

Sidney W. Jones
Sidney W. Jones

RESPONSES

4. Like the Obed WSR legislation, the Memorandum of Understanding (MOU) recognizes the different purposes of the two areas and documents how they can complement one another. When issues arise that affect Obed WSR resources or visitor experiences that are not covered by the MOU, the provision exists for consideration of those issues and possible modification of the MOU. Any future Congressionally authorized study of boundary expansion at Obed WSR would likely affect the areas mentioned.

COMMENTS

W. Thomas Brown, Assoc. Regional Director
 Southeast Regional Office
 National Park Service
 75 Spring Street, SW
 Atlanta, GA 30303

Dear Mr. Brown:

We would like to commend the NPS for a highly professional and thorough job on the 161 page document in regards to the OCP for the Obed Wild & Scenic River in Tennessee. We appreciate all the work and time that went into this proposal.

We also feel that you should support Alternative A. "Alternative A: The Preferred Course" constitutes NPS' proposed course of actions. Underlying this alternative is a management-zone system based on resource protection and visitor experience (as opposed to Alternative B, where management zones are based primarily on land-ownership patterns). Management zones are (a) the Wild Zone within which development is limited to existing bridge crossing areas and (b) the Development Zone.

The following points represent major praiseworthy features of Alternative A that differentiate it from Alternative B and are supported by us.

1. A single developed overlook, located at Lilly Bluff. This would meet the above criterion of having development limited to areas of existing bridge crossing "Lilly Bridges". By contrast, Alternative B would build a major developed overlook at the Obed/Clear Creek junction, which is not a bridge-crossing area and would result in a visual as well as probable auditory intrusion from the river for boaters and hikers. Alternative A calls for 5 undeveloped overlooks at the Obed/Clear junction, accessible by trails.
2. Obed junction and Norris Ford will be accessible by trail, rather than by motorized vehicles (as they are in Alternative B). In each location, parking would be made available a relatively short distance from the river, but without being visible or audible.
3. Several important boundary adjustments are advocated in Alternative A, each of which would add some land to the Wild & Scenic River area. Of the 7 items below, only two (b & g) are proposed in Alternative B.
 - (a) To include mouths of 4 tributaries (Muddy Branch, White Creek, Little Clear Creek, Melton Mill Branch) - a total of 25 acres.
 - (b) To include a stretch on the north side of the Obed (between Daddys and Clear Cr. confluences) that was inadvertently omitted from the original boundary - a total of 61 acres.
 - (c) Additional land at Liffey Bluff - about 20 acres.
 - (d) To complete a trail corridor between Obed and Clear Creek - 6 acres.
 - (e) To extend the boundary upstream of Adams Bridge on the Obed - 95 miles
 - (f) To extend the boundary 6 miles upstream on Daddys Creek - no purchase required (land is already within Cataraugus.)
 - (g) To buy parcels in Warthing for administrative purposes - 1+ acres.

RESPONSES

Koontz, Jay and Joyce

COMMENTS

Page 2

- 4. Studies are advocated that might clear the way for further boundary adjustments, namely additions of segments of the Emory, Mulbe Creek, and upstream portions of Obed and Clear Creek.
- 5. Alternative A of the GFP places a good deal more emphasis that had been given before on the need to maintain water quantity as well as quality, and provides more specifics concerning the threats. It documents 42 reservoirs larger than 2 acres in the watershed, including 15 that are more than 50 acre-feet in size. It recommends basinwide/regional comprehensive water resource planning. It also urges that information be obtained to determine water rights for the Obed NSR. Alternative B does not address these matters.
- 6. Alternative A proposes increasing the staff from the present (totally inadequate) 5 to 18-21. The staff increases (and thus the operating cost) are slightly lower for Alternative B. However, Alternative B would actually be costlier than A with respect to construction.
- 7. There is a major way in which the GFP could be improved: it needs to set more stringent objectives for water quality. The Management Objective pertaining to Water Quality currently reads: "To achieve and maintain high water quality..". We should advocate the "highest" water quality. NFS should urge the State to classify the Obed and its tributaries as Outstanding National Resource Waters.

We hope that the NFS will take all of this into consideration in making any decisions about the Obed Wild & Scenic River Systems.

Sincerely,

Jay & Joyce Kowitz
 6827 Higuera Rd.
 Ft. Wayne, IN 46818

RESPONSES

- 1. Please see the reworded management objective for water quality on page 10 and our response #3 to the Tennessee Citizens for Wilderness Planning.

COMMENTS

4796 Gwynne Road
Memphis, TN 38117-3210
January 29, 1995

W. Thomas Brown, Assoc. Regional Director
Southeast Regional Office
National Park Service
75 Spring St., SW
Atlanta, Georgia 30303

Dear Sir,

I am writing to commend the Park Service on the excellent General Management Plan developed for the Obed Wild and Scenic River in Tennessee. I particularly support "Alternative A", which provides a management zone system based on resource protection and optimal visitor experience. This alternative maximizes the opportunity to preserve the natural wild and scenic character of the area.

Sincerely,



Kenneth Kuiken

RESPONSES

Kuiken, Kenneth

No response necessary.

RESPONSES

George Mayfield

COMMENTS

TENNESSEE ORNITHOLOGICAL SOCIETY

Organized at NASHVILLE, TENNESSEE, October 1915
 For the Scientific Study of Tennessee Birds
 PUBLISHERS OF THE MIGRANT
 A Country Journal of Bird Life

Part
 OFFICE OF THE PRESIDENT
 GEORGE W. WILSON, JR.
 COLUMBIA, TENNESSEE 38401

15 Feb '95

Dear Mr. Brown:

I am writing you in regard to the NPS' General Management Plan for the "Obed Wild + Scenic River, Tenn. First let me commend NPS for a job well-done, also I ask you to support "Alternative A" for the following reasons:

1. Development of a Will River should be quite limited in order that it remain so. Limiting development to current bridge crossing areas and a Sily Bluff overlook is as much as should be contemplated.

2. I was as a past-President of the Tenn Ornithological Society, a life member of Tenn Citizens for Wilderness Planning and Tenn Scenic Rivers Assn, and as one who has conceived this entire system except for Daddy's Creek Gorge and Gaull's Bend above Adams Bridge on Obed River, not only enjoying the fine scenery + canoeing but also studying the breeding birds of the area. The Endangered Red Cocksided Woodpecker since nested in large pines above Devils Breakfast Table in Catosa, and the rare Swainsons Warbler is occasionally found in the dense Rhododendron thickets along these streams. In fact one of its locations was on the S.E. Bluff of Clear creek below hilly bridge. So I hope even the overlook in that area would destroy as few Rhododendrons + thickets as possible. In recent years I haven't been able to find as many of these birds on Territory as in the past, which is true of so many "neotropical migrants", especially Warblers.

Obed Jet and Norris Ford should be accessible only by trail + canoe, not by motor vehicles with parking lots.

(over)

COMMENTS

RESPONSES

3. Several Boundary adjustments advocated in Attachment 2 are quite important to me:
- a. Include the mouths of 4 tributaries (Muddy BR, White CK, Little Clear CK, and Melton Mill Br.) ^{on Horseshoe}
 - b. Certainly the part of O Bed River from Dabbs's CK to Clear CK, very beautiful + challenging to the canoeist must be included in the Park area.
 - note: additional land at Lily Bluff to protect bath security and the Swinson's Harbor.
 - d. Six addit. acres to complete a trail corridor between O Bed River and Clear Creek.
 - e. Extend the boundaries upstream to Adam's Bridge on O Bed River, for sure! This is very important!
 - f. Extend the boundaries 6 miles upstream on Dabbs's CK.
4. The feasibility of adding Zones along White Creek below Turn Bridges and upstream portions of Clear Creek at least to far Highway 127 should be studied and seriously considered as well as Emory River below Nemo Bridge and possibly further up O Bed River and Clear Creek.

5. More stringent standards should be set for both Water Quality and Quantity. Canoes depend on sufficient water to float their canoes only the warm late Spring to early Fall months are their most pleasant period for floating but frequently water is too low. Dam building on tributaries and upper reaches of these streams is most undesirable + damaging to water quality + quantity.

I wish to thank you in advance for your consideration of these requests.

Sincerely yours,
George R. Mayfield MD.

G. R. Mayfield Jr. MD
999 Sunnyside Dr.
Columbia, TN 38401

1. Please see the reworded management objective for water quality on page 10 and our response #2 to the Tennessee Citizens for Wilderness Planning.

RESPONSES

Gary Patton

No response necessary.

COMMENTS



January 23, 1995

W. Thomas Brown, Assoc. Regional Director
Southeast Regional Office
NATIONAL PARK SERVICE
75 Spring St., SW
Atlanta, GA 30303

Dear Mr. Brown,

My family owns approximately 200 acres with more than 1.5 miles of river frontage on the Obed River in Cumberland County Tennessee.

We feel that the Obed River General Management Plan is an excellent step in the right direction. We particularly are encouraged by what is known as "Alternative A".

We encourage the National Park Service to do everything possible to maintain the wild character of the Obed River, to provide appropriate but not imposing public access areas, and to hopefully expand the scenic river in the years to come.

Yours truly,

Gary Patton

COMMENTS

Doug Sanders
 1525 Fox Hollow Trail
 Knoxville, TN 37923
 (615) 694-6297

Regional Director
 Southeast Regional Office
 75 Spring Street, SW
 Atlanta, GA 30303

Dear Sir:

I read with great interest your Environmental Impact Statement for proposed improvements to the Obed Wild & Scenic River. If forced to select between the two alternative plans, I would support proposal A. I do however have one objection, and it is of magnitude sufficient to cause me to withhold support for either of the plans. I refer to the proposed long distance trail system.

I wonder if you really know what we have in the Obed System? It truly is a unique place. It is, in the main, not dammed. It is a geographical wonder. I could carry on in this manner for pages. Most of what I would say is already, explicitly or implicitly, covered in the EIS.

But there is one really special thing about the Obed that you will negatively impact with your proposed 'improvements'. That is the solitude that is available due to the limited 'easy' access of any kind to most of the river and creek corridors. What access there is not parallel to those waterways and canyons.

If a person wants to hike on a trail there is the Big South Fork National Recreation Area or the Great Smoky Mountains National Park. Both of these nearby areas are administered by the Park Service and are flush with trails. The state system provides further hiking opportunities. I believe that you should consider the entire region, not merely one small area, when planning recreational activities such as a trail system.

The Obed Wild & Scenic River System is a whitewater magnet in the winter and Spring. In the summer and fall, during reduced flows, this river system provides a wonderful backcountry off-trail experience. The only experience of its type available in this region.

RESPONSES

Doug Sanders

1. The trails (and other facilities) in the General Management Plan were proposed only after consideration of the purpose of the area, the management objectives, available information on the area's resources, and reasonable alternative activity opportunities. Trails are not necessarily incompatible with Wild and Scenic Rivers or even with designated wilderness areas. Based on all the available information, the General Management Plan provides for a trail system. However, as indicated on page 31, the Trail Layout Study will provide us with the site-specific information upon which to base our final decisions. Please also see our response #1 to the Environmental Protection Agency.

RESPONSES

COMMENTS

The impact of the proposed long distance trail system can be understood by considering the Burnt Mill Trail on Clear Fork Creek in the Big South Fork National Recreation Area. Along that section of stream paralleled by this trail there is very little privacy or sense of solitude. The aquatic life in that section of creek has been much reduced by over fishing.

In addition to the above comments, the growing concern over the Federal Deficit and the inevitable forth coming financial crunch will surely impact Federal spending in the Park System. The spending of over 1/2 million dollars just to construct the trail system (much less the additional moneys needed to maintain and administer it in the future) does not make sense.

Use whatever money is available to protect the watershed through land acquisition and other means. Build an overlook or two (if you must) so that those who wish to enjoy the canyon grandeur are able to do so. But protect our mini wilderness. Do not alter the very nature of what it is you are supposed to protect.

Sincerely,

Doug Sanders