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December 15, 2015

Attn: Plan Revision  
Team Leader,  
National Forests in North Carolina  
160 Zillicoa St., Suite A  
Asheville, NC 28801  
Submitted electronically to [NCplanrevision@fs.fed.us](mailto:NCplanrevision@fs.fed.us)

Re: Wild and Scenic River Evaluation Input

Dear Michelle,

American Whitewater is pleased to share our knowledge of potentially Wild and Scenic eligible streams on the Nantahala and Pisgah National Forests. We had previously submitted information on 22 streams we recommend as eligible, as well as support for the pre-existing 10-12. The Forest Service's list of 53 potentially eligible streams is a very good one, and includes our recommendations. We would like to thank your team for putting together a solid list of exemplary streams for analysis.

We are most familiar with streams that are large enough to support whitewater paddling and will focus on sharing the known values of these streams. This is not to say we don't feel other streams are eligible for biological and other reasons, we are simply unaware of the values of some smaller streams and we look forward to reviewing additional information in the Draft EIS.

We ask that the Forest Service recognize the value of whitewater paddling in the Southern Appalachians and the unique role the Forests play in protecting paddling opportunities. Paddling steep mountain streams in the United States is an activity that has its roots in Western North Carolina, where pioneers of the activity have long pushed barriers on the region's challenging waterfalls and rapids. This occurs because the region has a stunning array of almost daily year-round paddling options of all difficulties, which is true nowhere else but perhaps parts of Oregon and Washington State. The quality of paddling opportunities has continued to foster a hotbed for whitewater-related advances, instruction, summer camps, tourism, and manufacturing. Many, many people live and work in Western North Carolina because of the paddling opportunities here. Whitewater paddling is a legitimate thread in the economic and social tapestry of Western

North Carolina going back many years. Whitewater paddling opportunities are severely impacted and limited by hydropower dams in the region, and we rely upon the Wild and Scenic Rivers Act to protect the last best free-flowing rivers not dammed or diverted.

We are supportive of the process that the Forest Service has used so far to review potentially eligible streams. In addition to the standard screens employed by the Agency in looking at eligibility we ask that the Agency consider the cumulative impacts and incredible footprint that dams have in the Southern Appalachians. The Wild and Scenic Rivers Act was authored to create a system of protected streams to offset the impacts of dam building. Western North Carolina has almost 400 dams, making our remaining free-flowing rivers all the more important. With the big rivers almost all under or blocked by reservoirs, our headwater streams serve as critical refugia for biodiversity and river recreation alike. Many of those headwaters streams are themselves impacted by dams and development making the remaining free-flowing streams extremely important.

Below we will highlight the regionally or nationally significant rare, unique, or exemplary values of Western North Carolina streams, and offer citations where appropriate. I have personally paddled many of these streams and can attest to their values. I have over 20 years of paddling experience in WNC, contributed to the most popular guidebook for the area, have a comprehensive knowledge of the impacts of hydropower dams in the region, have a background in river ecology, and feel comfortable assessing the relative values of rivers in the region. We have divided the streams into three sub-regions for ease of discussion. We feel strongly that the following streams possess at least the values we list and describe below, and are thus eligible for Wild and Scenic designation:

## **The Northern Mountains**

**Elk River**

**Free-Flowing**

**ORV: R**

- **Recreation:** Elk River Falls is a spectacular ~50 foot tall waterfall popular with hikers and swimmers. Paddlers launch below the falls, or occasionally above them, for a high quality river trip over numerous waterfalls and powerful rapids. A 40-foot falls in the heart of the gorge is the largest straightforward waterfall for paddling in Western North Carolina. The waterfalls on the river are regionally rare and exemplary. While a relatively short section of the river is in North Carolina, protection of Elk River Falls would protect a significant recreational attraction in and of itself and also indirectly protect recreational opportunities downstream.



Roaring Creek	Free-Flowing	ORV: F, W, P
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- Fish, Wildlife, Plants / Ecological Values: Roaring Creek is a tributary to a Natural Heritage Program Natural Area (North Toe River).<sup>1</sup>

Spring Creek	Free-Flowing	ORV: F, W, P, R
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- Fish, Wildlife, Plants / Ecological Values: Spring Creek is a Natural Heritage Program Natural Area (Exceptional Value) in concert with the French Broad. Spring Creek offers relatively cold and clean water as both refugia and as an important input to the French Broad system.



- Recreation: Spring Creek is a lovely Class III-IV creek run that is suitable for intermediate paddlers. The run boasts some memorable ledge drops that grant paddlers a taste of verticality without significant objective hazards. Spring Creek is an important recreational resource in concert with the French Broad and Big Laurel for bringing people to the recreational hub of Hot Springs. See also AW Webpage: <http://www.americanwhitewater.org/content/River/detail/id/1128/>, and North Carolina Rivers and Creeks, Pg. 179.<sup>2</sup>

South Toe River	Free-Flowing	ORV: F, W, P, R
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- Fish, Wildlife, Plants / Ecological Values: The South Toe is a Natural Heritage Program Natural Area. The South Toe is home to an important Appalachian elktoe mussel population,<sup>3</sup> is home to rare and diverse fish species, contains brook trout, and has a strong hellbender population. The river is also home to *Virginia spiraea*. With its headwaters on the densely forested northeast face of the highest mountains in the eastern US, the South Toe is an especially important cold water refugia as the climate warms.



<sup>1</sup> The NC Natural Heritage Program can be researched here: <http://www.ncnhp.org>.

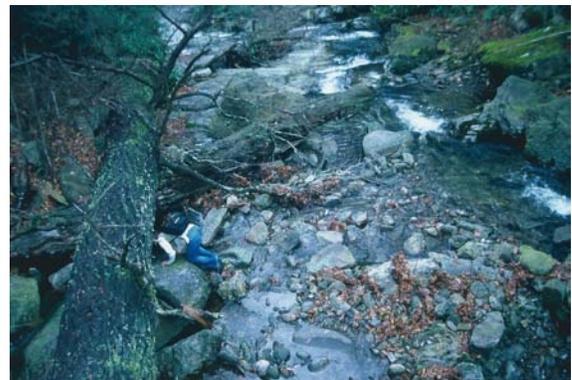
<sup>2</sup> Davis, Leland. North Carolina Rivers and Creek. Brushy Mountain Publishing, 2005. FYI, there is often a copy on the shelf of the NC Forest Service office to the right of the reception desk.

<sup>3</sup> [https://ecos.fws.gov/tess\\_public/profile/speciesProfile.action?sPCODE=Q2R1](https://ecos.fws.gov/tess_public/profile/speciesProfile.action?sPCODE=Q2R1)

- Recreation: The South Toe River boasts Class IV whitewater paddling in its headwaters, which eases to outstanding Class III in the reach near Carolina Hemlocks. The river offers fine trout fishing. Campers enjoy the stream at Black Mountain Campground and dispersed sites, and a diverse array of campers, picnickers, swimmers, and sunbathers gather at Carolina Hemlocks to enjoy the river. While much of the South Toe, North Toe, and Cane River watersheds are private land with limited public access and significant private development the South Toe around Carolina Hemlocks upstream to its headwaters (excluding the golf course) offers rare and exemplary opportunities to enjoy the rivers of this region.

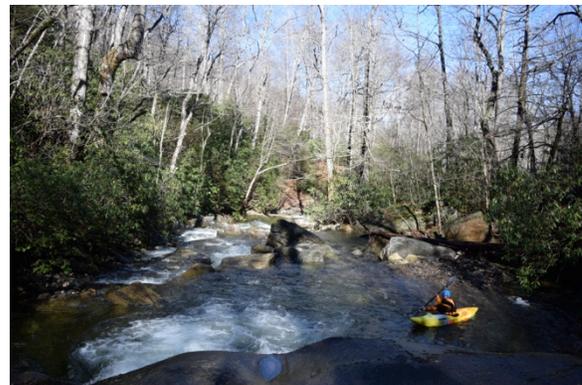
<b>Middle Creek</b>	<b>Free-Flowing</b>	<b>ORV: F, W, P</b>
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- Fish, Wildlife, Plants / Ecological Values: Middle Creek is a tributary to a Natural Heritage Program Natural Area (South Toe River). The watershed is recognized as a natural area, and retains large trees, and an intact cold clear stream with high elevation origins. It is also exceptional bear habitat. A good trail offers exceptional opportunities to view and experience the area.



<b>Rock Creek</b>	<b>Free-Flowing</b>	<b>ORV: F, W, P, R</b>
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- Fish, Wildlife, Plants / Ecological Values: Rock Creek is a tributary to a Natural Heritage Program Natural Area (South Toe River). Rock Creek is larger than Middle Creek, and is a major tributary of the South Toe. It offers superb brook trout habitat and has pockets of old growth and northern species. As the highest watershed in the Eastern US, Rock Creek offers important refugia from climate change. It is also exceptional bear habitat.



- Recreation: Rock Creek is of similar size and scenic value to the Big East Fork of the Pigeon to which people flock to camp, hike, fish, paddle and swim. One of the recreational values of Rock Creek is that it is relatively untrammelled. Hikers are unlikely to see another person or group while exploring the watershed. A good trail offers views and occasional access to the stream's fishing and swimming holes, as well as scenic vistas of

the crystal clear tumbling stream. Beyond the trail hikers and scramble up through the stream's massive namesake rocks through a rarely visited valley of immense beauty. At high flows the creek offers a challenging hike-in Class V descent, followed by some high quality class III and IV paddling.

**Waterfall Creek**

**Free-Flowing**

**ORV: S**

- Scenery: Waterfall Creek offers hikers views of Douglas Falls as well as other cascading drops. The Creek is a popular waterfall viewing destination for visitors to the immensely popular Craggy Gardens area on the Blue Ridge Parkway. See images at: <http://www.ncwaterfalls.com/douglas1.htm>

**Johns River**

**Free-Flowing**

**ORV: F, W, P**

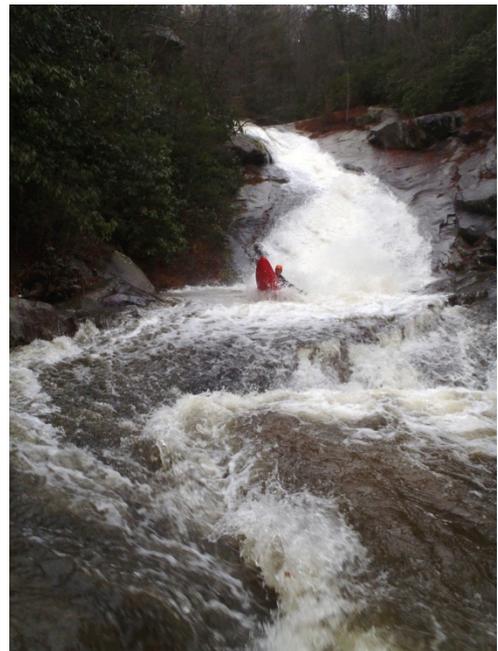
- Fish, Wildlife, Plants / Ecological Values: Johns River is a Natural Heritage Program Natural Area. The 1982 Nationwide Rivers Inventory (NRI) cites fisheries and wildlife ORV's.
- Note that the 1982 NRI also cites Scenery, Recreation, Historical and Cultural values, stating "remote forested corridor."<sup>4</sup>

**Gragg Prong**

**Free-Flowing**

**ORV: F, W, P, R**

- Recreation: The Gragg Prong is one of the whitewater treasures of Western North Carolina with large slides and rapids recognized around the world. The signature rapid is called Drag Strip, a long steep slide on which paddlers reach incredible speeds and are sent skipping across the pool at the bottom. These bedrock features are emblematic of the Wilson Creek watershed. Throughout the run, as paddlers approach and navigate horizon line after horizon line, paddlers traverse a charming rhododendron lined gorge. We strongly feel that the whitewater paddling experience offered by the Gragg Prong warrants protection as an ORV. AW webpage: <http://www.americanwhitewater.org/content/River/detail/id/4237/>. See also North Carolina Rivers and Creeks, Pg. 204.



<sup>4</sup>NRI can be researched here: <http://www.nps.gov/ncrc/programs/rtca/nri/states/nc.html>

- Fish, Wildlife, Plants / Ecological Values: The Gragg Prong is a tributary to Natural Heritage Program Natural Area (Wilson Creek) providing clean and cold water into the system.

Lost Cove Creek	Free-Flowing	ORV: F, W, P, R
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- Recreation: Lost Cove Creek offers outstanding waterfall viewing and swimming for hikers at Hunt Fish Falls. The Falls is also the start of a fine whitewater descent of moderate (III/IV) difficulty. It is a treat to have a hike in paddling trip that does not require advanced/expert skills to descend. Like Harper and North Harper Creek, Lost Cove is a key component of the recreational options in the Wilson Creek watershed. We'll note that while Upper Creek and Steels Creek offer interesting paddling, we have chosen to emphasize the values of the Wilson Creek watershed as outstanding among their peers. AW Website: <http://www.americanwhitewater.org/content/River/detail/id/3561/>. See also North Carolina Rivers and Creeks, Pg. 206.



- Fish, Wildlife, Plants / Ecological Values: Lost Cove Creek is a tributary to Natural Heritage Program Natural Area. (Wilson Creek)

North Harper and Harper Creek	Free-Flowing	ORV: F, W, P, R
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- Recreation: North Harper Creek offers daring paddlers a chance to descend at least a portion of a multi-staged large waterfall in a beautiful gorge as well as significant backcountry paddling. Like Lost Cove Creek, Harper and North Harper Creek are key components of the recreational options in the Wilson Creek watershed. We'll note that while Upper Creek and Steels Creek offer interesting paddling, we have chosen to emphasize the values of the Wilson Creek watershed as outstanding among their peers. AW Website:



- <http://www.americanwhitewater.org/content/River/detail/id/1148/>. See also North Carolina Rivers and Creeks, Pg. 207.
- Fish, Wildlife, Plants / Ecological Values: Harper Creek is a tributary to Natural Heritage Program Natural Area (Wilson Creek).

**Catawba River****Free-Flowing****ORV: F, W, P, R**

- **Fish, Wildlife, Plants / Ecological Values:** The 1982 NRI notes fisheries and wildlife values, and the river downstream is home to Oconee Bells and other rare species. The Catawba River has been seriously impacted by a chain of dams stretching from near its headwaters to the swamps of South Carolina. We feel that given these impacts and the goal of the Wild and Scenic Rivers Act to preserve remnants of our last best rivers the upper Catawba should be protected as eligible.
- Note that the 1982 NRI recognized Scenic, Recreational, Geological, Fisheries, Wildlife, Historical, and Cultural ORV's and noted inspiring scenery rich in diversity of flora.

## **The Balsams and Escarpment**

**North Fork French Broad River****Free-Flowing****ORV: R**

- **Recreation:** The North Fork of the French Broad is a classic and popular whitewater run for paddlers from around the region. It offers paddlers a strong intermediate creek boating experience in a beautiful setting, close to population centers like Asheville and the gateway community of Brevard, without any portages. Rapids like Submarine, Razorback, the Clog, and the signature Boxcar Falls are well known to many paddlers. A large watershed provides flows more frequently than on many comparable rivers. Local lore has it that a narrow gage boxcar was lost in the very deep pool at the base of Boxcar Falls during a historical train wreck. The North Fork is the go-to creek for paddling on the south face of the Balsams, and is exemplary among its peers like the Davidson and Mills from a whitewater paddling standpoint. We would also point out that the rest of the French Broad River itself is significantly degraded, and we would like to see its headwaters protected (including the West Fork). See also AW Website: <http://www.americanwhitewater.org/content/River/detail/id/1077/>. See also North Carolina Rivers and Creeks, Pg. 56-57.

**Courthouse Creek****Free-Flowing****ORV: R, S**

- **Recreation:** Courthouse Creek offers paddlers some great class IV creek boating when the flows are high, and generally too high for other nearby options, making it a great pairing with the North Fork French Broad (when one is running at a good flow the other is

generally not). This creek is a charmer, and very pretty. Paddlers have run Courthouse Falls quite successfully. See also North Carolina Rivers and Creeks, Pg. 55.

- Scenery: Courthouse Falls is a beautiful and popular waterfall viewing opportunity. The narrow 50-foot waterfall is unique, exemplary, and immediately recognizable among waterfall enthusiasts.



### Looking Glass Creek

Free-Flowing

ORV: R, S

- Scenery: Looking Glass Falls is an extremely popular attraction for visitors to Pisgah, the Blue Ridge Parkway, and particularly the Brevard area. Water flow is essential to the scenic values.
- Recreation: Sliding Rock is a unique and exemplary waterslide for swimmers at times of low water and an equally exemplary waterslide for intermediate or advanced paddlers at high flows. The rock's smooth surface and perfect pitch make for a great descent regardless of your choice of craft. The rest of the creek offers some good micro-creek boating over several named rapids. Looking Glass Falls has been kayaked several times successfully, and it would be hard to consider that anything but exceptional. See also North Carolina Rivers and Creeks, Pg. 52.



### West Fork Pigeon River

Free-Flowing

ORV: F, W, P, R, S

- Recreation: The Pigeon River is renowned for its degraded water quality, dams, diversions, and popular dam-release whitewater run at the state line. Far upstream though the river offers some of the best paddling in the East. The West Fork is a true gem, offering paddlers roughly four miles of unrelenting class IV/V whitewater of the highest quality, with outstanding scenery that is emblematic of the Balsams. A definite notch easier than the also-classic Big East Fork, the West Fork offers road access and an online gage, yet has a remote and secluded feel with



uninterrupted natural views. One rapid if formed by a massive tree embedded in the streambed that is comparable to old growth trees found in Joyce Kilmer. Just downstream of the run the river is severely impacted by Lake Logan, the paper mill discharge, development, Walterville Reservoir, and then a long diverted reach below Walterville Dam. The upper forks of the Pigeon are the vestiges of a once great whitewater river stretching over 70 miles, and are themselves exemplary. See also this video:

<https://vimeo.com/148573090>, and North Carolina Rivers and Creeks, Pg. 64.

- Fish, Wildlife, Plants / Ecological Values: The West Fork of the Pigeon River is a Natural Heritage Program Natural Area (High Value) below the eligible reach and is home to appalachian elktoe mussel. The eligible reach has comparable values, brook trout habitat, and salamander habitat. It is a high elevation, north facing, largely protected watershed that can serve as an important refugia as the climate warms. While the watershed is protected, to our knowledge the river itself is not protected from dams.
- Scenery: The main crossing of Highway 215 downstream of the Blue Ridge Parkway is commonly referred to as the “Garden of the Gods” by paddlers and offers exemplary waterfall viewing looking upstream, and a boulder-strewn high energy river downstream.

**Middle Prong WF Pigeon**

**Free-Flowing**

**ORV: R**

- Recreation: The Middle Prong offers hikers the chance to traverse and view an extremely scenic and remote stream that bridges the high elevation balsams with lower elevation terrain, all in protected Wilderness. Paddlers too are treated to remote and wild experience. See also North Carolina Rivers and Creeks, Pg. 65.

**Little East Fork Pigeon River**

**Free-Flowing**

**ORV: F, W, P**

- Fish, Wildlife, Plants / Ecological Values: The Little East Fork is a tributary of Natural Heritage Program Natural Area (West Fork Pigeon River).
- Note that the 1982 NRI reported Scenery, Recreational, Geological, Fisheries, and Wildlife values for the Little East Fork. See also North Carolina Rivers and Creeks, Pg. 66.

**Big East Fork Pigeon River**

**Free-Flowing**

**ORV: F, W, P, R**

- Recreation: There is no question that the upper reaches of the Big East Fork are among the best advanced/expert whitewater runs in the eastern United States and are deserving of a recreation ORV. Downstream of the 276 bridge though the river also offers a very nice paddling descent of moderate (Class III) difficulty featuring views up toward Cold Mountain and the Balsams. The trip



takes paddlers through a cobble and boulder riverbed that is actively migrating in some locations within its floodplain in a healthy manner. The water quality is outstanding. See also North Carolina Rivers and Creeks, Pg. 60 regarding the section above Highway 276, and the AW Webpage for the lower section now under consideration:

<http://www.americanwhitewater.org/content/River/detail/id/1111/>.

- Fish, Wildlife, Plants / Ecological Values: The Big East Fork is a Natural Heritage Program Natural Area (High Value), though it appears the Natural Area is below the potentially eligible reach. We see no merit in this delineation as there are no biological barriers between the reaches and similar habitat exists between the two. We feel that the potentially eligible reach is equally deserving of recognition.

**Shining Creek & Greasy Cove Prong**

**Free-Flowing**

**ORV: S**

- Scenery: Both Shining Creek and the Greasy Cove Prong are beautiful Wilderness streams that are often photographed and visited by hikers.



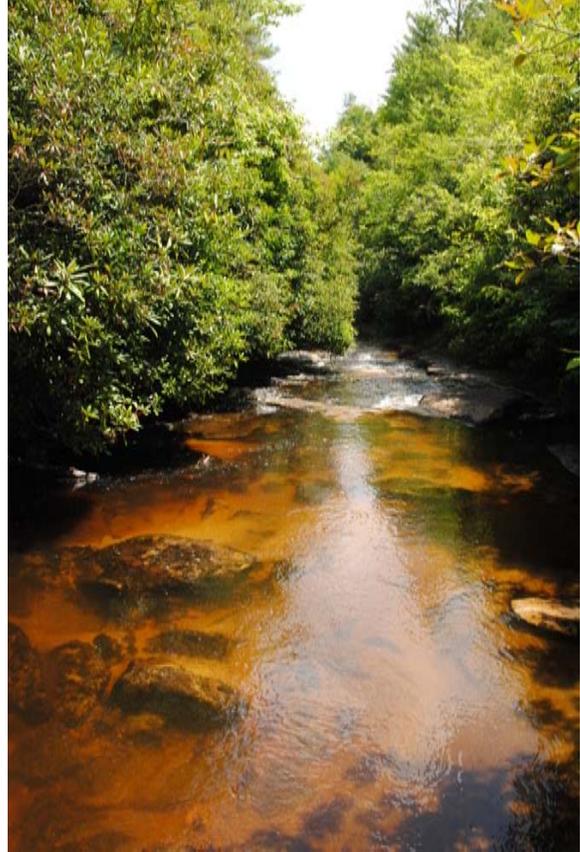
**(East Fork) Tuckasegee River, Panthertown Creek, Greenland Creek, & Frolictown Creek.**

**Free-Flowing**

**ORV: F, W, P, R, G**

- Geology: These streams are an integrated system that are part of a rare and distinct stream type characterized by highly tannic water, sand substrate, and a large influence of wood, riparian vegetation, and bedrock in a low-gradient but high elevation valley that also contains significant waterfalls. The streams have unique floodplain and wetland systems of high biological value. These streams are the best example of their kind, and the only example that occurs almost entirely on public lands. The few other similar streams have been heavily developed for golf courses, reservoirs, and housing developments. The streams of Panthertown Valley are a geomorphological treasure. In addition, numerous named cliffs ring the valley.

- Recreation: Panthertown Valley is a recreational treasure as well, in large part because of the streams. Between meandering sections of flatwater are named and beautiful waterfalls like Granny Burrell, Frolictown, and Wardens that attract hikers. Campers and day-hikers alike swim in enormous pools and slide down slippery water-slides. Rock climbers enjoy viewing and swimming in the streams on their way to climb granite domes that offer spectacular views. Paddlers that hike their boats in are treated to one of the most remote and unique descents in the southeast. Launching on either Greenland or Panthertown creeks will take paddlers on a journey through tunnels of rhododendron on meandering tannic water, and at times over high quality waterfalls and slides. At their confluence paddlers prepare for a wild descent over the large slides and rapids of the East Fork of the Tuck as it pours out of Panthertown Valley down through a seldom-traveled gorge. The remoteness of the streams adds to the paddling experience. This section shares some recreational characteristics with Lake Jocassee drainages but is easier and more accessible (which is a good thing in this case). Without question paddling these streams is a unique, and exemplary experience. See also AW Website: <http://www.americanwhitewater.org/content/River/detail/id/2710/>.



- Fish, Wildlife, Plants / Ecological Values: Panthertown Valley offers important refugia for plants, animals, and specifically aquatic species that have little or no similar options left in the region. Note that just as the high country around Panthertown Valley has been largely developed, so too has the Tuckasegee River downstream of the valley, with a chain of reservoirs impacting the river for its entire journey from the bottom of the recommended eligible reach to Tennessee and beyond. Rare bogs and floodplain wetlands dot the valley and support unusual and diverse plants and bryophytes. The Valley is excellent bear habitat.



**Tanasee Creek****Free-Flowing****ORV: R**

- **Recreation:** Tanasee Creek offers paddlers a great Class III-IV whitewater run in the Tuckasegee Watershed that is otherwise severely impacted by dams. The river is rumored to be beautiful and have a decidedly remote feel, but without many difficult class IV rapids. This run is very different from the upper East Fork and other Panthertown runs, and is perhaps more similar to the typically dewatered West Fork of the Tuckasegee.



Given that so much of the Tuckasegee headwaters is either under reservoirs or in bypassed reaches we feel that Tanasee Creek is a rare example within this watershed and the broader region. See also AW Webpage:

<http://www.americanwhitewater.org/content/River/detail/id/4242/>

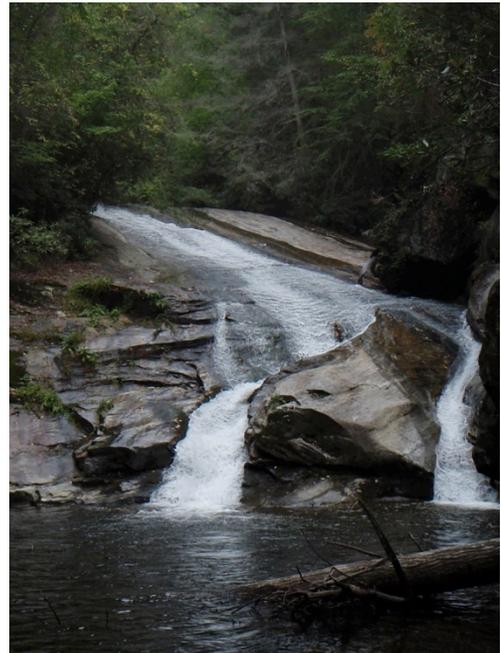
**Whitewater River****Free-Flowing****ORV: R, S**

- **Recreation:** The Whitewater River's upper gorge is an incredible advanced/expert whitewater run featuring huge drops separated by calm sections. The mini-gorge series may be one of the most unique rapids in Western North Carolina as paddlers drop and thread through a tiny slot canyon that exits at the lip of a 30 foot waterfall. Compared to its peers on the Jocassee escarpment, the Whitewater is noteworthy for having easy road access and a more reasonable length. It is still a significant undertaking. See also North Carolina Rivers and Creeks, Pg. 78-80, and the AW Webpage: <http://www.americanwhitewater.org/content/River/detail/id/3564/>.
- **Scenery:** Viewing opportunities for Whitewater Falls more than justifies a Scenery and Recreational ORV.
- The 1995 NRI noted Scenic, Recreational, Geological, Fish, Wildlife, and other values. The NRI found: "The exposure of ancient rocks produces some of the most spectacular scenery in western North Carolina. Sheer cliffs and gorges are caused by erosion. Upper Whitewater Falls cascades 411 feet. The Whitewater Gorge contains tropical mosses and ferns. Water quality and fishing are excellent. A portion of the 43-mile Foothills Trail runs from the USFS parking lot at upper Whitewater Falls."



<b>Thompson River</b>	<b>Free-Flowing</b>	<b>ORV: R</b>
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- **Recreation:** The Thompson is a classic Jocassee escarpment run with the huge slides that define the zone, which is world-renowned. It is a small watershed but when flows are high it offers paddlers a committing and exhilarating descent through rhododendron-lined banks at incredible speeds. The Thompson is growing in popularity among paddlers. The Forest Service manages no other comparable river. See AW Webpage: <http://www.americanwhitewater.org/content/River/detail/id/1133/>.



- The 1995 NRI noted Scenic, Recreational, Geological, Wildlife, and other values. The NRI states: “The river contains scenic waterfalls, cascades, and rapids. The main gorge and sheer cliffs caused by erosion and river action are impressive. Extensive surrounding forests support healthy populations of game and non-game species, including black bear. The main gorge area contains tropical species, while other vegetation representative of the Southern Appalachians are found.”

<b>Overflow Creek</b>	<b>Free-Flowing</b>	<b>ORV: R</b>
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- **Recreation:** Overflow Creek is among the top dozen or so most classic and beloved whitewater steep creeks in the Southern Appalachians. It boasts a stunning diversity of waterfalls and rapids that are of the highest quality. While the whitewater run is downstream of the potentially eligible reach, protecting the headwaters would help protect this incomparable recreational treasure.

## **Far Western North Carolina**

<b>Cullasaja River</b>	<b>Free-Flowing</b>	<b>ORV: F, W, P, R, S</b>
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- **Recreation:** The Upper Cullasaja is a short and sweet Class V whitewater run featuring the incomparable Triple Drop rapid. This is one of the most accessible runs on which to paddle whitewater of this scale and challenge. Scenic values are high with Highway 64 offering views and access. See also North Carolina Rivers and Creeks, Pg. 98, and the AW Webpage: <http://www.americanwhitewater.org/content/River/detail/id/3397/>.
- **Fish, Wildlife, Plants / Ecological Values:** The Cullasaja is a Natural Heritage Program Natural Area (High Value).

- Scenery: Bordered by the Scenic Byway of Highway 64 the Cullasaja offers outstanding views of a steep mountain stream laced with waterfalls. Nearby Highlands, NC has a tourism and second-home economy based largely on the scenic attributes of the area.
- The 1995 NRI found Scenic, Recreational, Geological, Fisheries, Wildlife, Historical, Cultural, and other ORVs. The NRI notes: “In a 7.5-mile national forest section, the river drops 1300 feet. Known as the Cullasaja Gorge, it has three well-known waterfalls. The gorge has been recognized as botanically diverse, beautiful, and geologically unique in the Southern Blue Ridge. Numerous rare plants occur within the gorge. US64 roughly parallels the river and has been designated a USFS Scenic Byway. The river is a NC Class B trout stream. Archaeological sites have been identified dating from as early as the Archaic Period.”



<b>Slickrock Creek</b>	<b>Free-Flowing</b>	<b>ORV: R</b>
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- Recreation: One of the most remote streams in Western North Carolina, Slickrock poses the kind of challenges for paddlers that exemplify Wilderness recreation. A significant and gorgeous hike-in is required to even assess flows. Once on the water paddlers traverse 5.5 miles of challenging whitewater with significant wood in the river, followed by a significant paddle-out on Calderwood Reservoir. We view Slickrock as recreationally rare for its remote nature and Wilderness paddling character. See also North Carolina Rivers and Creeks, Pg. 130.



<b>Cheoah River</b>	<b>Free-Flowing Questionable</b>	<b>ORV: F, W, P, R</b>
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- Fish, Wildlife, Plants / Ecological Values: The Cheoah River contains an important isolated population of appalachian elktoe mussels,<sup>1</sup> as well as Virginia Spirea. It is also the site of the reintroduction of several rare fish species. The entire Cheoah River is either under a reservoir or in a diverted reach which American Whitewater and the Forest Service played a large role in restoring flows to. The river is still impacted by the flow diversion, but is functioning well given our collective restoration efforts. We struggle with whether such a highly regulated diversion reach should be considered “free-flowing.”

- Recreation: The Cheoah is without question an outstanding whitewater run, and likely the most continuous “big-water” run in the region. 9 miles of great class III and IV whitewater flow when the dam releases 18 times annually. As stated above, this is the only river listed in these comments that give us pause regarding its free-flowing status. It undoubtedly has ORV’s in spite of the hydropower diversion. See also



North Carolina Rivers and Creeks, Pg. 128, and the AW Webpage:

<http://www.americanwhitewater.org/content/River/detail/id/3146/>.

Santeetlah Creek	Free-Flowing	ORV: F, W, P, R
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- Fish, Wildlife, Plants / Ecological Values: Santeetlah Creek is a Natural Heritage Program Natural Area. Brook trout thrive high in the watershed, and the Creek is home to a biologically important population of the rare and endemic Junaluska salamander. The Creek also is home to remnants of old growth forest. A recent/imminently planned dam removal reconnects significant habitat and restores unbroken free-flowing status. The



larger Cheoah Watershed is severely impacted by Santeetlah Dam and others on the Little Tennessee River. Many other tributaries are severely impacted and/or developed. Santeetlah is the largest stream left in the watershed with significant values and merits protection in this context as well as on its own merits.

- Recreation: Santeetlah Creek is an unqualified recreational gem. Fishing and camping are superb. The upper reaches of the Creek offer a Class V kayaking run of storied beauty, challenge, and quality. The big trees, stout bedrock rapids, and clear water define the run. Below the more challenging section is mile after mile of gorgeous class III and IV whitewater all the way to Santeetlah Reservoir, which undoubtedly drowns even more great whitewater. Paddlers are transported between towering walls of mature mountain laurel and rhododendron, through moderate and memorable whitewater, amidst a feeling of great natural purity, even with the road nearby. See also North Carolina Rivers and Creeks, Pg. 124-126, and the AW Webpages: <http://www.americanwhitewater.org/content/River/detail/id/3383/>, <http://www.americanwhitewater.org/content/River/detail/id/3382/>, <http://www.americanwhitewater.org/content/River/detail/id/1121/>.

**Little Santeetlah Creek****Free-Flowing****ORV: F, W, P**

- Fish, Wildlife, Plants / Ecological Values: Little Santeetlah Creek is a tributary of a Natural Heritage Program Natural Area (Santeetlah Creek)

**Sassafras Creek****Free-Flowing****ORV: F, W, P**

- Fish, Wildlife, Plants / Ecological Values: Sassafras Creek is a tributary of a Natural Heritage Program Natural Area (Snowbird Creek)

**Gibby Branch****Free-Flowing****ORV: F, W, P**

- Fish, Wildlife, Plants / Ecological Values: Gibby Branch is a tributary of a Natural Heritage Program Natural Area (Brush Creek - Little TN River)

**Wayah Creek****Free-Flowing****ORV: F, W, P**

- Fish, Wildlife, Plants / Ecological Values: Wayah Creek is a Natural Heritage Program Natural Area

**Britton Creek****Free-Flowing****ORV: F, W, P**

- Fish, Wildlife, Plants / Ecological Values: Britton Creek is a tributary of Natural Heritage Program Natural Area (Valley River)

**Hiwassee River****Free-Flowing****ORV: F, W, P**

- Fish, Wildlife, Plants / Ecological Values: The Hiwassee River is a Natural Heritage Program Natural Area. Numerous rare species call the river home, including the cumberland bean mussel<sup>5</sup> which may or may not reside in the potentially eligible reach. The Hiwassee is a biologically diverse river that has been severely impacted by dams. Remaining free-flowing river reaches are thus extremely valuable as refugia for rare species. Large rivers with good water quality are regionally rare given the impacts of dams and pollution, making the Hiwassee especially valuable habitat.

**Fires Creek****Free-Flowing****ORV: F, W, P, R**

- Fish, Wildlife, Plants / Ecological Values: Fires Creek is a Natural Heritage Program Natural Area. Fires Creek is home to one of the most significant hellbender populations in

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<sup>5</sup> [http://www.fws.gov/raleigh/species/es\\_cumberland\\_bean.html](http://www.fws.gov/raleigh/species/es_cumberland_bean.html)

NC and Southeast, an important population of rare smoky mountain dace, as well as at least two rare species of crayfish: hiwassee headwaters crayfish and the valley river crayfish. On the edge of a region where freshwater ecology has been devastated by dams, Fires Creek is an important refuge.

- Recreation: Fires Creek offers paddler miles of continuous class II-III+ whitewater offering an exceedingly fun recreational experience. The run is in an area severely impacted by dams, making it valuable as a wild place amidst otherwise developed waterways. See also AW Webpage: <http://www.americanwhitewater.org/content/River/detail/id/3925/>.



Thank you for considering these comments. The remaining free-flowing streams in the Nantahala and Pisgah national forest are beacons of hope for eastern waterways. They still flow clean and cold and support incredible biodiversity and a robust recreation economy and lifestyle. They form the heart of one of the world's great paddling destinations. Dams have had a profound impact on the rivers and streams of our region, and we ask that the Forest Service protect at least the rivers listed above as a system of outstanding rivers and streams set aside from future development.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Colburn'. The signature is fluid and cursive, with a prominent 'K' and 'C'.

Kevin Colburn  
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