



15 Tower Road
Ellijay, GA 30540

P 706.635.TREE (8733)
F 706.636.1371
E info@gafw.org

www.gafw.org

August 23, 2010

USDA Forest Service
Ranger Michele Jones
Ranger Larry Thomas
Conasauga River Ranger District
3941 Highway 76
Chatsworth Georgia, 30705

Dear Larry and Michele,

Re: The Mountaintown Creek Trail Access Environmental Assessment

Georgia ForestWatch (GFW) welcomes this opportunity to comment on the recently released Mountaintown Creek Trail Access draft Environmental Assessment (EA). We wish to note at the outset of our response that Georgia ForestWatch and its members support mountain biking as a healthy pursuit in the right places under the right conditions. As a relatively new recreational activity on public land, biking has been imposed on some areas where its practice is a potential threat to bikers, other forest trail users and negatively impacts streams and wildlife. We welcome bikers on the Mountaintown Creek Trail but not their bikes.

During the scoping period, GFW submitted comments on this proposal reflecting the concerns of our 650 members, some of whom have hunted, fished, hiked and botanized along Mountaintown Creek for 40 years. The EA was not labeled as a draft, but a recent conversation with the National Environmental Policy Act (NEPA) coordinator for the forest, John Petrick, confirms that it is a draft. We find this somewhat reassuring as the current EA is totally inadequate and needs to be redone, if not replaced, by an Environmental Impact Statement. NEPA requires the Forest Service (FS) not only to evaluate obvious short-term impacts, but also the longer-term impacts that “when added to other past, present and reasonably foreseeable future actions, regardless of what Forest Service (federal or non-federal) or person undertakes such other actions,” according to 40 C.F.R. § 1508.7 The purposes of NEPA are to ensure that federal agencies carefully consider detailed information concerning environmental impacts and to guarantee that the relevant information is made available to the public. Hughes River Watershed Conservancy v. Glickman, 81 F.3d 437, 443 (4th Cir. 1996). Fundamentally, NEPA requires agencies to take a “hard look” at the likely environmental impacts of their actions before proceeding with those actions. In this EA, the Forest Service has failed to take a hard look, ignored or side-stepped GFW’s comments, and failed to inform themselves of readily available facts that contradict the conclusions reached and the alternative selected.

The Forest Service is obliged to consider the consequences of their proposal on both the natural and human environments. The preferred alternative will, over time, increase siltation into

Mountaintown Creek, thus degrading the health of the creek, plus greatly increase bike traffic on the Mountaintown Creek Trail, negatively impacting other users' experiences and ultimately making pedestrian travel on Mountaintown Creek Trail unappealing.

Bike use on the trail was initiated illegally by bikers in the early 1990s. The Forest Service violated NEPA by not providing the public with notice and a chance to comment and appeal at that time. In response to GFW's comments about this, the FS says on page 71 of the EA:

This is a legacy trail that people have been using for at least 70 years, which is prior to NEPA and no NEPA analysis is required for the trail. In the 1990s, an administrative decision was made to allow for mountain bike use. This was well within the decision making authority of the District Ranger at that time. Since that time, the Pinhoti Trail Expansion EA documents that mountain bikes are allowed on this trail. Mountaintown Creek Trail meets the design criteria for Class 2 bicycle trails.

GFW does not dispute that this is a legacy trail. As we have noted, several of our members have used the trail, actually an old abandoned logging road, to hunt and fish for 40 years. GFW does dispute the contention that turning this trail into a bike trail in the early '90s was properly an administrative decision. NEPA was the law of the land at that time, and the proof that NEPA guidelines should have been followed at that time is the fact that we are going through a NEPA analysis at present. Nothing has changed. This "administrative" decision in the early '90s somehow was taken without any process or creating any documents. In 2005, GFW asked the District Ranger at that time, Debbie Whitman, for any and all records pertaining to the creation of this bike trail. We were told that none existed. The FS usually maintains records of their decision-making process. How is it that this significant decision was not documented?

Since mountain biking on the Mountaintown Creek Trail has never before been subject to NEPA analysis nor allowed by any documented decision, the question that ought to be addressed in the current EA is not whether to expand mountain bike access to the Mountaintown Creek Trail, but whether mountain bike access to the trail should be allowed at all. All of the Forest Service's own documents and the lack of original documentation, plus FS guidelines, indicate that the answer to the latter question is no.

On the topic of the appropriateness of the trail, we noted in our earlier scoping comments, "At the July (2008) public meeting concerning the Mountaintown bike trail Ranger Jones and staff member Larry Thomas, in response to a question from GFW, stated that if they were to examine the Mountaintown area today they would **never place a bike trail down the riparian corridor** where it currently exists with slopes exceeding 30 percent and numerous fords." In the EA and the appendix, the FS chose not to respond to this question. We ask again why, if this trail does not meet standards, is it not only allowed to exist, but a proposal is being put forward that will dramatically increase its use?

Not only was the trail created illegally, but the trail was and is too steep and narrow in places for safe bike and pedestrian use combined. In our comments, we pointed out that a section of the trail has slopes approaching 30 percent, with several other sections exceeding 20 percent. We pointed out that, according to the *USFS Trail Construction and Maintenance Notebook* (2007 Edition), trails should not exceed an average of 10 percent slope on any given section. The FS response to this on page 72 of the EA was:

The Trail Construction and Maintenance Notebook is not being applied appropriately in this case. The 10% Guide and the ½ Rule is applied to the planning of new trails. Mountaintown Creek is a legacy trail, not new trail construction. The 10% Guide and the ½ Rule would be applied as needed to the proposal to re-route the Pinhoti Connector.

This is an interesting bit of circular logic. We could not build a trail like this now, but since it was created (illegally) we can bless it, ignoring the intent of guidelines intended to protect users and resources. In another part of the appendix, on page 66, the FS responds to GFW's comments about the steepness of the trail by saying:

Although the trail was not specifically designed for biking, it does meet Forest Service design parameters for bicycle Trail Class 2. Most of the trail is less than 12% grade. There are a few steep pitches that exceed 15% and at one point in the "gorge" area, the grade is 28% for about 100'.

This response ignores the fact that this is not a bicycle trail but a multi-use trail. It may be appropriate for bikers looking for a thrill, but it is certainly not appropriate when shared with pedestrians on a narrow treadway. The Forest Service, instead of forthrightly examining the issues raised in our comments, seems to be avoiding them. This is far from the "hard look" required by NEPA. All uses must be examined together and realistically, based on the on-the-ground reality in the areas of environmental and social impacts.

User conflicts have existed since bikers began riding this trail. In the early '90s, the now-defunct Gilmer County Sportsman's Club complained about bikers interfering with hunting activities to the Georgia DNR game warden for the area. They were given no opportunity to comment on the bike takeover and were told that it was a "done deal." In the EA, the Forest Service dismisses user conflicts by stating on page 54, "Although uncommon, the District has received complaints over the last several years from fishermen/hikers about negative interactions with mountain bikers on the upper portion of the Mountaintown Creek Trail. Based on the information provided, the complaints stem from two issues. First, there is a concern about hiker safety because of the speed at which the bikes ride the trail. The second complaint is that encountering mountain bikes ruins their backcountry experience and they do not like to hike on trails where mountain bikes are allowed."

The animosity between mountain bikers and pedestrians appears to be widespread, according to surveys of forest managers.

Forest managers were asked if they had observed or received reports of user conflicts; 7 in 10 Forest managers (70 percent) reported that they had. Many reported the problem was between mountain bikers and equestrian groups (41 percent), or between mountain bikers and hikers (31 percent). Another 21 percent reported that the mountain bike rider was the problem (for example, mountain bike riders' speed). Others reported or observed that hikers or equestrian group members were the problem (not the mountain bike riders; 11 percent). Other conflicts reported were between mountain bike riders and motorized groups (all-terrain vehicles, off-highway vehicles; 10 percent), and conflicts between mountain bike riders and pack animal groups (4

percent). Additional conflicts were reported between mountain bike riders and the natural resources (wildlife, vegetation; 7 percent).

(“USDA Forest Service Research Paper PSW-RP-226-Web.” 1996.)

What the FS fails to do is what NEPA directs them to do and that is to take a hard look at this issue, which we raised in our comments.

As we noted in our comments, up to this point, there have been very few bikers on the trail. When the trail was first established, mountain biking was a relatively new pastime in Georgia. By the late '90s, the exit for the trail through private property was closed, and many bikers quit using the trail, as the FS acknowledges on page 68 of the appendix to the EA.

We contended in our comments that the proposal to connect the Mountaintown Creek Trail with the very popular Bear Creek Trail will dramatically increase bike traffic and user conflicts and present a real threat to pedestrian safety. The FS dismisses the idea that bike traffic will increase noticeably with this proposal. They provide little in the way of analysis to support this contention, other than to suggest that the Mountaintown Creek Trail is ridden strictly downhill and that the only way for riders to do this is to ride uphill on FS roads for 24 miles. We noted in our comments that we were aware of several groups that were shuttled to the top. The FS, with no analysis, dismissed this as impractical because of the distance involved. A brief glance at the various mountain bike trail blogs reveals this post:

This is a tough trail! If you do the whole loop it is around 22 miles. We have done it several times. Doing the whole loop is a lot of Forest Service Road riding which I can do without. What we do now is take two cars. We drive one to the upper trailhead parking lot and park one at the bottom on Gates Chapel Road. That way we skip all the dirt road riding and just do the single track. It is an epic ride best done in warm weather. Lots of creek crossings that can be deep after a hard rain, but that is why I mountain bike and not road bike. I love the adventure! This is a great ride, but you need to be a pretty good technical rider to ride this trail. If you want to have a great epic ride...Enjoy!!! Review edited 12/28/2009**

<http://www.singletracks.com/bike-trails/mountaintown-creek-trail.html>

Or one can find the following post on the MTBR trail review forum at

http://trails.mtbr.com/cat/united-states-trails/trails-georgia/trail/PRD_167625_4541crx.aspx:

Summary:

If you're looking to make an all-mountain ride out of this thing, its long. Most of the loop is actually fire roads, but the mountain town creek trail IS the jam. The first half of the trail is probably my favorite ride on the east coast. Its a lot of steep, technical descents with mad rocks and some fun whoopdeedos. creek crossings are frequent and deep. you can ride some of them. the second half of the trail flattens out but still offers a beautiful ride!

Recommended Route:

we ran shuttles last time i was there, but the drive to the top (which is the same as the ride) takes forever. just drive until Gates Chapel road turns to gravel and make a right

on FS 90, continue until it dead-ends into FS 68; go right. Take this to the top and make a right at the T intersection (you will pass bear creek trailhead on the way). ride/drive about 6.5 miles and you'll eventually see the trailhead on your right.

http://trails.mtbr.com/cat/united-states-trails/trails-georgia/trail/PRD_167624_4541crx.aspx

One has to assume that if it is this easy to find mention of shuttles, they are common, and there is no reason to believe that they will not become more so in the future as word gets out that the trail has a legal exit and is a closed loop.

In our comments, we pointed out that the ever-expanding Atlanta metro area, with its 6 million residents, is only a few hours away and that this fact alone guarantees increased usage. The FS failed to address this point.

If the FS wanted to take a look at the future of the Mountaintown Creek Trail, they could look at the situation that exists today at the Bear Creek bike trail complex. Weekend hikes to the Big Poplar on a section of the Pinhoti Trail, once a popular local pastime, have become an ordeal. As far back as 2004, Al Summers, the news editor of the “Ellijay Times-Courier,” had this to say about a hike to the Big Poplar in one of his weekly columns:

“So, I am left with deciding how I feel about this situation being based on personal experience. I have been brushed by speeding bikers on the Bear Creek trail while walking to the Big Poplar. If they had run over my little daughters, I would have demanded the Forest Service declare a season on bikers. My guess is the DNR would have become involved and they would have declared a limit of three as being the number of bikers that could be harvested each year. Two other times walking in this same area, there have been near misses with bikers who have related to me they “own the road.”

In 2008, Georgia ForestWatch Ecologist Darren Wolfgang wrote a letter to the FS describing a hike he led on the Pinhoti Trail, just south of the Bear Creek/Mountaintown Creek Trail area:

A case example of the point we were trying to illustrate occurred this past Saturday, October 25, 2008, on a section of the Pinhoti Trail off FS 18. The referenced conflict occurred when a group of GFW hikers attended an educational hike along the Pinhoti Trail as part of our annual fall retreat. While in the middle of a trailside discussion the group was bombarded by 4 mountain bikes, none of which attempted to slow down, the bikers simply shouted “on your right” as they rode down the slope at full speed, not having a care in the world that they just forced a group of not one but three hikers on an educational hike from the trail into the woods.

The group of hikers was passed by several more mountain bikes along the trail, and the most significant encounter occurred when a group of 3 bikers, again at full speed on the muddy trail, skidded and slid down the Pinhoti trail towards the hikers, the speeds they were traveling at would have made it difficult for the bikers to slow down, stop, or potentially maintain control of their bikes. If the hike group had not elected to yield, the last of the three bikers would have almost certainly lost control of the bike and crashed, as the rider shouted at the group ordering them to “move out the way, I can’t stop.” We wonder how this kind of activity will play out on Mountaintown trail, where there is no

good place to quickly evacuate the trail and slopes exceed 35percent on many sections of the upper trail.

In addition to looking in the immediate vicinity to judge the possibility of future user conflicts on the Mountaintown Creek Trail when access is improved, the FS could have studied other areas that have tried to place bicycles on existing hiking trails, but did not do so. Following is a collection of accounts of the failure of the multi-use concept from out west, where mountain biking became a popular form of recreation before it did here. The document is part of a Motion to Intervene, Comments and Protest to the Federal Energy Regulatory Commission regarding the Lake Oroville (Feather River) Dam Project 2100-119: These public lands long used by hikers had bike trails imposed upon them.

History of Failure

“Share the trails” is the cornerstone of the national mountain biking interest’s public relations campaign to successfully promote opening public trails to mountain bike use. In the 1980’s and early 1990’s, this philosophy was used to convince many decision-makers that a “Sunday ride in the park” was precisely what mountain biking is all about and that no social nor environmental impacts would occur once trails were opened to use by bicycles.

By the late 1990s however, mounting evidence of environmental damage, user conflicts and use displacement convinced many jurisdictions to return to earlier regulations and ban the use from public trails.

The public agencies’ actions amplify growing discontent among officials with the problematic sport. Of eight agencies interviewed on mountain bike use compliance with rules and regulations, all stated that the single biggest problem was the disproportionate amount of time that officers and staff spent on enforcement (See “Liabilities” this report). It is a costly sport in terms of enforcement, but also in terms of medical costs¹.

*Bryant Creek Trail in **Banff National Park, Canada**, was closed in 1998 by officials due to disturbance to wildlife habitats. According to the Parks Superintendent, the distance a mountain bike can travel effectively shrinks the wild habitat from a human disturbance point of view. Predictably, mountain bike interests charged “discrimination” and said the trail should be closed at all. However, no credible evidence was presented that habitat disturbances ever occurred in the past, prior to mountain bike use introduction. The fact that the bike can travel so fast and far may in fact disturb grizzly habitat, a concern raised by nature personnel in Parks Canada when the trail was closed.²*

***Boulder, Colorado**—home of the International Mountain Biking Association—opened 6500 acres of parks in 1983 after discussion among agency staff and mountain bike interests, who committed to maintain and monitor trail use. Prior to that date, city parks prohibited mountain biking use. In 1987, after years of multiple efforts to educate, post signs, distribute brochures and offer a college course in proper mountain bike trail etiquette, Boulder officials barred the high impact sport from the parks systems because of off-trail damage, community complaints and staff-observed conflicts between mountain bike uses and other trail uses.³*

Alley Pond Park, Queens, in 1999, stepped up enforcement to include fines and seizures of mountain bikes after cribbing, logs and other maintenance devices, installed to impede erosion and bike traffic, were torn out and destroyed by mountain bikers unhappy with the trail closure and bike repair. The Parks Commissioner stated “They kill the vegetation, they cause erosion and they turn the thing into a motorcross track. It’s a public park, not a racing ground.” The Parks Forester stated that the footpath had been expanded from 12 inches to 5 feet due to aggressive bike riding; that further evidence was present of bikers straying off trails, creating new trails and damaging tree roots.⁴

Palos Verdes, Rolling Hills and Palos Verdes Estates, California, in 1990, banned mountain biking from their hiking and equestrian trails, citing unmanageable conflicts. Some bikers are “courteous, others are not,” but the overall assessment concluded that the uses are in conflict.⁵

Point Mugu, California, was the site of radar guns purchased by the State rangers in 1995 to clock and ticket speeding mountain bikers on “multi purpose” trails. As one ranger observed, “a lot of hikers are no longer coming” to the area because they no longer can enjoy the hiking experience. Radar guns are a clear indication of a chronic, not an occasional problem.

When the Golden Gate National Recreation Area (GGNRA) planners limited mountain biking use in 1995, there were sued by biking interests, including IMBA. On appeal, the Ninth Circuit Federal Court of Appeals opined that testimony about mountain bike use speeding, causing erosion and scaring horses are valid indicators of use conflicts and the Court upheld the extensive ban on mountain biking imposed on Marin County Trails in the GGNRA. The mountain bike interests tirelessly demand “statistics or scientific studies” to prove conflicts exist, but the published Court opinion has clearly set aside that false argument and has provided that letters and verbal testimony about social conflicts are admissible and clear indicators of past, present and the likelihood of future conflict.⁶

In 1990, the MidPeninsula Regional Open Space District (MROSD), California adopted extensive guidelines, policies and standards in order to permit mountain biking on multi-use trails. The mitigation measures included

- *a published etiquette brochure*
- *caution and speed limit signs*
- *increased ranger patrols in hotspots with persistent problems*

In 2000, the MidPeninsula Regional Open Space District (MROSD), California voted to ban mountain biking in seven preserves, approximately 40 percent of the parks area, because of repeated problems with user conflicts and long-term damage to the parks ecosystems promoting erosion:

The Agency launched a review of its trail policies after receiving a steady stream of letters from people who complained that their outdoor experience was marred by a run-in with bicyclists... Often the letters were from senior citizens and families with young children who said that they were afraid to hike the most popular trails.⁷

A Commissioner admitted during the reconsideration that opportunities for tranquil nature study and observation had been lost and that the Agency had strayed from its directive to provide a peaceful outdoor experience. Reported as a threat to close trails, the district Commissioners subsequently voted to ban biking in seven preserves.

This significant development occurred in an area that spent countless hours detailing policies, guidelines and standards to permit mountain biking on multi-use trails only to reverse its own policy when too many uncontainable problems arose because of the use.⁸

*The **Tantalus Trail, Hawaii**, near the Hawaiian Nature Center, was closed by State officials in February to mountain bike use. The officials said that the halt was needed to allow recovery from rutted and eroded trails. Conditions on the 18-mile trail system were monitored for five years and mountain bike use damage was witnessed and documented; a lot of “near accidents” were also reported where hikers had to jump out of the way, said the program manager for the State Na Ala Hele trail program.⁹*

*In **North New Jersey**, the Morris County Parks Commission, in 1999, banned mountain biking use from all but two parks. The Commission reconsidered after predictable pressure from bike interests who promised to “educate” bikers on trail etiquette. Mountain bike use is already prohibited on unpaved trails in Essex and Union counties due to repeated reports of conflicts, trail damage and loss of solitude among other trail users.¹⁰*

***Orange County, California**, a parks system touted by IMBA interests as a model, is experiencing significant damage from environmentally and socially irresponsible mountain bike use. In Aliso and Woods Canyons Wilderness Parks, there is now a visible decrease in quality of habitat because bikers ride off of designated trails creating their own and poach hiker/equestrian trails when rangers are not present. The effects have been cumulative: “Rogue mountain bikers ride right over the vegetation – even prickly pear cactuses – commonly replanted to block illegal trails. Signs identifying closed trails are taken down faster than I can put them up,” (Ranger) Maloney said.¹¹*

¹ 23,409 mountain biking injuries in 1994 doubled to 48,604 injuries in 1995, costing more than an estimated \$384 million (medical, legal/insurance, disability costs/other expenses) per a report from the 1997 Convention of the American Academy of Orthopedic Surgeons.

² Banff National Park, P.O. Box 900, Banff, AB, T0L 0C0

³ Use of Mountain Bikes in Boulder Mountain Parks, Department of Recreation and Parks, City of Boulder, Colorado, www.ci.boulder.co.us/bmp/Plan/bikes.htm

⁴ *New York Times*, June 27, 1999, “Dirt Flies in Parks Agency’s Battle with Mountain Bike”

⁵ *Los Angeles Times*, September 22, 1994, “Mountain Bikers Produce Unhappy trails for Some.”

⁶ *San Francisco Chronicle*, May 5, 1996, “Court Tells Bikers to Take a Hike”

⁷ *San Jose Mercury News*, March 5, 2000, “Mountain Bikers Facing Backlash Proposal Could Result in Ban on Some Popular Public Trails”

⁸ The staff report prepared for the July public meeting disposed of a variety of bikers’ arguments, including their denials of any significant trail conflicts. The report cited long-term observations and experiences of the staff that confirmed “abundant and substantial” evidence of trail-use conflicts; it also cited “a large number of bicycle accidents, demonstrating the inherent speed and control issues that lead to trail conflicts.” The record showed 166 solo bicycle accidents reported

from 1996 through 1999 as well as another 15 accidents caused by bicyclists and another 18 incidents between bikers and other users.

⁹*Star Bulletin*, nd, "Bike Ban Revives Happy Trails in Tantalus"

¹⁰*Star Ledger*, "Plan Would Leave Bikers Unable to Tread," March 28, 1999.

At a 2009 Park Service meeting for the Chattahoochee National Recreational Area, citizens expressed their lack of support for trails that would include bicycle access:

The possibility of a Chattahoochee River footbridge linking Sandy Springs to National Park Service holdings in east Cobb County mostly drew public support Thursday night.

That support waned, though, if the bridge included access for cyclists.

The Park Service is considering a span near Morgan Falls as a way to increase access to green space to mostly built-out Sandy Springs and to highlight new riverfront holdings in east Cobb.

Plans call for the service to build new pedestrian or pedestrian/bike trails in those new holdings, eventually leading to picnic and recreation areas at Johnson Ferry Road, park superintendent Dan Brown said.

But while some opponents at the hearing at the Chattahoochee Nature Center objected to the estimated price tag of \$1.2 million, most found fault with the potential for cyclists, particularly mountain bikers, to share the trail.

"The mountain bikes appear to have taken over" in the park already, one resident complained. Others said that cyclists already had toppled signs prohibiting bikes in some areas. (Atlanta Journal-Constitution, Saturday, May 2, 2009)

The ease with which one can find such information about user conflicts and reckless bike riding raises the question of whether the FS took a hard look at user conflicts and pedestrian safety when preparing this EA or, as it appears, went through the motions with a predetermined end in mind. Bikers are certainly welcome to their stunts but not at the expense of other users.

Pedestrians who venture into Mountaintown do not have to experience a collision with a speeding bicycle to have their experience ruined, as was eloquently expressed by John J. Kuiper M.D. of Los Angeles (*Los Angeles Times*, Sept. 22, 1994). As in most cases, California seems to experience new trends first:

"Hiking involves such close interaction with one's natural surroundings that a sense of Isolation and tranquility envelops the hiker. When this is abruptly interrupted by a 200 pound mass of metal and humanity hurtling down the trail within inches of the biped trail user, the ability to regain that sense of oneness with nature is lost and not easily recaptured. Violation of the enjoyment and safety of hikers by mountain biking is too high a price to pay."

“Bikes are silent and fast,” said Jim Absher, a social scientist with the Forest Service. “If you've ever experienced someone roaring around a corner at 30 mph, it's terrifying. That feeling is the opposite of what hikers want from a forest trail.”

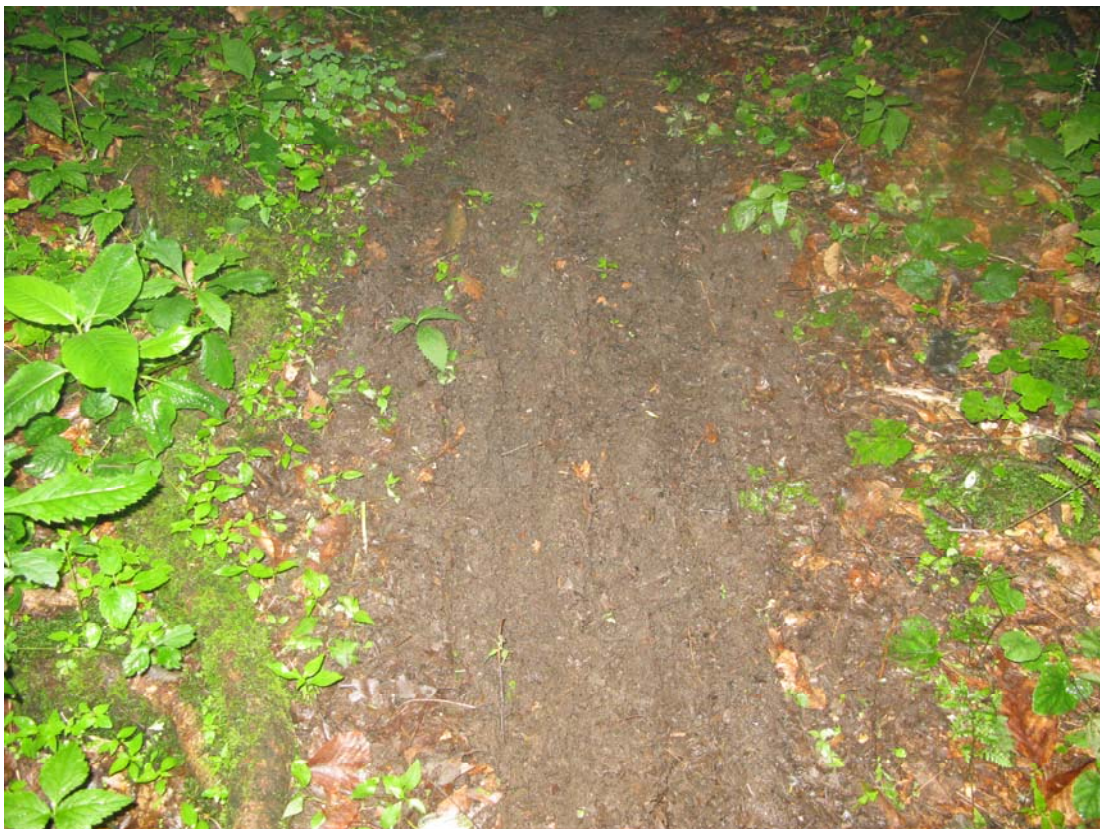
The FS has already permitted bike races in the wet season on steep portions of the Pinhoti Trail such as Baker Branch. If the preferred alternative is selected, will we see bike races down the Mountaintown Creek Trail?

The Forest Service’s only response to our concerns about user conflicts and safety is to argue, without any data, that hikers and anglers will rarely use the upper reaches of the trail and that signage **could** be posted at the trail head warning hikers and bikers of danger.

The Forest Service proposes to build a foot trail to improve access to the lower part of the stream from the Bear Creek parking lot. Georgia ForestWatch supports this improved access for pedestrians. This new trail will result in a shorter and easier route into Mountaintown for pedestrians yet, citing no evidence, the Forest Service concludes that this will not significantly increase hiker use. Why? The Mountaintown trail is only 6 miles long. Georgia Forest Watch regularly conducts hikes and many of the participants are in their 50s ,60s and even 70s. Many of these hikes cover 10 miles or more, and hiking at a moderate pace, even elderly participants easily cover this distance.

The Forest Service-proposed action will dramatically increase pedestrian and bike use yet the only remedy proposed to insure hiker safety is signage. In fact, there is a sign posted at the entrance to the Bear Creek bike trail complex urging bikers to yield to hikers. In polling the many GFW members who have hiked, fished and hunted in the area, we have yet to hear of a single encounter when bikers followed posted trail etiquette and yielded to hikers.

The section of the Pinhoti connecting the Mountaintown trail and the Bear Creek bike complex is presently posted for no bikes, but bike tracks can be seen every time one looks. The below photo of the area was taken by David Govus during a fishing trip May 20, 2010.



Based on this history, we cannot see why the FS feels that signs will protect pedestrians on the narrow 20-30 percent grade of upper Mountaintown Creek Trail. In fact, the FS is so casual about signage concerning user conflicts that the trail etiquette sign that was posted behind a plexiglass door at the top of Mountaintown Creek Trail was recently removed by the FS for some unknown reason.

The FS's estimate of low usage of the upper part of the trail does not take into account the significant increase caused by the implementation of options 1 or 2, which greatly increase ease of access to the trail for mountain bikers and other users, including those who may drive to the top and travel only one way.

Their assertion that the best fishing is to be found on the lower section is unsupported. The personal experience of a number of GFW members is that the best fishing and hunting are found the further one gets from people. This is particularly true in Mountaintown where a decade or more of high temperatures and drought have apparently reduced trout numbers in the lower section of the stream. GFW members regularly fish Mountaintown Creek and report that the fishing is far superior on the upper, higher and colder stretches of the stream. This will become more pronounced as climate change continues.

The FS and the GA DNR have not sampled the stream to estimate trout populations in over a decade (per conversation with Ruth Stokes, District Biologist). The unavoidable conclusion when reviewing this EA is that, instead of the NEPA-required "hard look" in regard to safety, user conflicts and increased use, the FS gave a casual glance.

The issues of sedimentation and siltation of Mountaintown Creek have existed since the illegal introduction of mountain biking to the area in the 1990s. The trail crosses the creek numerous times, and several of these fords are sites of old bridges with steep banks. As testimony and videos contained in this document demonstrate, bikers, for unknown reasons, furiously churn their knobby tires trying to ascend these steep grades. Pedestrians, of course, can easily cross with little disturbance.

In dismissing the issue of user conflicts, the Forest Service also failed to consider the thrill-seeking and dangerous behavior exhibited and glorified by a large number of mountain bikers.

It is not uncommon, while browsing the Web, to encounter images of mountain bikers wearing body armor while riding down steep slopes such as found on the upper Mountaintown Creek Trail. We contend that danger and risk-taking are part of mountain bike culture and that this culture poses a threat, not only to bikers but anyone sharing the trail with them.

A large percentage of bikers are “downhillers.” They ride for the thrill of speed, which they have a perfect right to do as long as they do it where their speeding does not endanger pedestrians who are on the same trail seeking a more natural experience and/or the activity does not degrade the natural resource. Reading the trail reviews of the Mountain Creek trail from the MTBR website, one finds this post:

I took advantage of unseasonably cool weather to do the 22mi loop. the miles went by very fast with gentle middle-ring hills most of the time, and some great overlooks along the way. i followed Hellbelly's directions, and was uncertain about which way to go at times, so i just stayed on the main FS road when in doubt, and it worked out. For clarification: after the gennet poplar, stay left on bear creek, dont take the loop, at the gate on bear creek, FS 64 is the road to the left. the descents on the FS road were nice for breaking up the monotony of the climb, but i got kinda chilly. also, the road had a fair amount of traffic on it, so i was always worried about coming around a blind corner and right through a windshield. luckily, the only traffic i encountered while going down was a Jeep going the same way, and passing it was quite satisfying. after a short eternity, i got to the mountain town trail head. I dropped the seat all the way down, softened up the rear shock for a plush ride, finished my granola bar, and set out down the singletrack. the waterbars provided some decent air with little effort but I was alone, so i didnt want to go too big. the waterbars ended right about the same time that i was starting to think that they would populate the entire descent. after that, the trail flattens out, and i was eventually forced to raise the saddle to pedal better. I was able to ride all but 2 or 3 water crossings, but i was rarely the right gear for climbing the other side of the creek.

http://trails.mtbr.com/cat/united-states-trails/trails-georgia/trail/PRD_167624_4541crx.aspx

The rider is pleased that he is going so fast that he passed a motor vehicle coming down from Three Forks on FS road #64. We have never passed another vehicle on a FS road unless that vehicle yielded and have always assumed an implicit speed limit of around 20 mph on gravel FS roads. With his reckless behavior, he is right to be concerned about going through a windshield. We would not like to encounter him on the steep upper section of the Mountaintown Creek Trail, particularly if he had a companion and could go **big**.

The SORBA website currently has the following link to a video, entitled “Get Dirty,” which, while mildly amusing in a puerile fashion, speaks volumes about the reckless tendencies of some mountain bikers and their lack of concern for riparian areas or the environment in which they ride: <http://www.youtube.com/watch?v=ru2Dpe1LkNU>. One would expect that SORBA, which claims to promote responsible riding and consideration of other trail users, would not feature such a video.



(Image taken August 6, 2010, from video at <http://www.youtube.com/watch?v=ru2Dpe1LkNU>, entitled “Get Dirty,” posted by RobinMoore)



“Drop my food in the mud,” raps this video, as a mountain bike rider drops food and wrapper on a trail.

(Image taken August 6, 2010, from video at <http://www.youtube.com/watch?v=ru2Dpe1LkNU>, entitled “Get Dirty,” posted by Robin Moore)

Another mountain bike website, “**bikerag**,” seems to revel in injuries and dangerous accidents: http://www.bikerag.com/bike_crash_pics.htm.



(Screen shot taken August 6, 2010, from http://www.bikerag.com/bike_crash_pics.htm)

*As **mountain** biking grows in popularity, so too does the number of **injuries** sustained by cyclists. From 1994 to 1995, **mountain** biking **injuries** doubled, according to research presented this month at a meeting of the American Academy of Orthopaedic Surgeons in San Francisco.*

*About 60 percent of all **mountain** biking **injuries** were attributed to environmental factors such as branches, rocks or steep terrain.*

*“Lack of riding skills or mechanical failure to the **bike** were considered the other reasons for injury,” said study author Dr. Mary A. Bos of the Institute for Bone and Joint Disorders in Phoenix. In 1995, there were 48,604 **mountain** biking **injuries**. (Chicago Sun-Times, February 23, 1997)*

The Forest Service’s own survey, “USDA Forest Service Research Paper PSW-RP-226-Web,” noted the following:

Forest managers were asked if they had observed or received any reports of mountain bike accidents; about half of the Forests (48 percent) had observed or received reports of mountain bike accidents.

Mountain biking is a very dangerous sport. We attach here by reference a compilation of stories concerning mountain bike wrecks labeled Exhibit 1, as well as an account of extreme downhill bike-riding behavior labeled Exhibit 2. The Forest Service in its EA acknowledges that mountain biking is dangerous and that those who chose to ride steep trails such as Mountaintown accept that risk. We agree that bikers should have freedom to take risks. We point out though that wrecks imply loss of control and that out-of-control bikers on the steep, narrow Mountaintown trail are a very real danger to all other users. Exhibit 2 suggests that this extreme riding is a popular and common practice. This danger to pedestrians is both a physical danger and a psychological one as the Forest Service social scientist Jim Absher noted as referenced above on page 10. The very threat of encountering a speeding out-of-control biker can destroy the reason that a person chooses to take a walk in the woods in the first place—peace and quiet and a connection with nature. Those hiking, hunting, fishing or botanizing on the Mountaintown Trail have a right to expect this peace of mind.

It is easy to find accounts of riding Mountaintown Creek Trail, if one looks. The following describes a ride down Mountaintown Creek Trail in November of 2009:

We're rolling again, and finally make it to the start of the mythical trail we're here to ride. It's the whole reason we climbed all these fire roads to begin with. I'm cold and skeptical, but eff it. This Mountaintown Creek Trail is supposed to be the shit.

We start down and it really is pretty awesome. It's wide and fast, and it has ridges made to keep the road from washing out every few yards. The ridges serve as pretty good jumps. I like jumps. I'm in the air a lot.

We are following a stream down the mountain, and soon begin to crisscross over it again and again. I like splashing through streams despite the cold.

On the way through one, my front tire sinks deep into some mud and I go over hard into the stream. I crack my right knee really good on a rock. I'm afraid it will be broken and I'll have to hop out of the mountains dragging my bike, but it's just cut and banged up, thankfully. I press my kneecap from all directions and it appears to still be attached.

Lest it should decide to seize up or hurt more, I give Chris the go ahead and we're off. From here, the trail gets progressively less fun to ride, although beautiful.

Soon we pass a waterfall and I stop to take a photo. Chris is some way down the trail, but listening, as it turns out, to see if he can hear my disc brakes singing and signifying that I am ok and on my bike. I catch up to him again, and we continue to descend.

There is a lot of skill to riding a mountain bike down a gravel road, and even more required to ride it (d)town a ridiculously steep mountain trail that is covered in softball-sized rocks... especially when those, in turn, are obscured by a layer of fallen leaves. The

upshot of all this is that you can't really know for sure where your bike will be at any given moment, despite the fact that you're attached to it at the feet. Hitting the brakes only serves to start a skid, which means even less control for you, the rider.

The ride refused to end. Soon we are carrying our bikes over fallen log after fallen log, and slogging through mud and over stream crossings. I am talking a lot about the cheeseburger I intend to eat when we are finally done.

<http://www.jimhodgson.com/2009/11/29/mountaintown-creek-trail-ride/>



Rider's photo of injury incurred while mountain biking on the Mountaintown Creek Trail
(Image copied August 6, 2010 from
<http://www.jimhodgson.com/2009/11/29/mountaintown-creek-trail-ride/>)

The above narrative is similar to other accounts of a bike trip down the steep Mountaintown Creek Trail. The riders become airborne as much as possible, they lose control, and they try to drive through the creeks and churn their way up the other side with their knobby tires.

One added feature here is the reference to the loud screeching of their disc brakes. Several local still hunters have complained that this noise disrupts their hunting in Mountaintown. The narrator, clearly a skilled rider, labels the trail "ridiculously steep," often loses control, and ultimately falls and injures himself, as shown in the above photo.

The FS correctly noted in the EA that mountain biking is a hazardous sport and riders implicitly accept that risk. GFW agrees with this but feels that the high rate of injuries necessarily implies that riders often lose control, and an out-of-control rider is a hazard to other trail users. This fact does not appear to have occurred to the FS in this analysis.

On page 56 of the EA, the FS suggests that future user conflicts can be resolved by those hikers, fishermen, and hunters who do not want to risk being run down by a speeding bike abandon the area and remove themselves to the Cohutta Wilderness. This is an outrageous suggestion. Fishermen, hunters and nature lovers who have used the area for decades should abandon the area because a group of bike riders have illegally inserted themselves into the area? This does not qualify as the serious analysis NEPA requires.

Another issue is damage to lands and wildlife caused by present and increased mountain bike use on the trail.

In the *Las Vegas Review-Journal*, Martin Griffith wrote:

Mountain bikers with a need for speed and thrills have made Lake Tahoe the latest front in an ongoing battle over the illegal construction of bike trails in national forests and other public lands.

The U.S. Forest Service is cracking down after renegade bikers secretly cut up to 30 miles of trails in the Tahoe backcountry over the past decade.

Agency officials said a hard-core group of bikers seeking access to steeper, more demanding terrain is to blame for bootleg trails in national forests across the country, including in California, Colorado, Montana, North Carolina and Utah.

<http://www.lvrj.com/news/53397297.html>

As reported in “USDA Forest Service Research Paper PSW-RP-226-Web,”

Forest managers were asked if they had seen any evidence of resource damage from mountain bike use. More than one-half (58 percent) of the Forests reported seeing evidence of resource damage from mountain bike use. Only 2 percent reported that they could not tell whether resource degradation was attributable to hikers, horses, livestock, motorcycles, all-terrain vehicles, 4-wheel drive vehicles, or mountain bike use. The most common types of resource degradation included trail impacts (48 percent), soil impacts (36 percent), and water related impacts (27 percent).

Damage included trail widening, braiding, rutting, shortcuts, and switchbacks, user-created trails, erosion, compaction, siltation, tread damage, stream bank damage, litter and vandalism.



Video taken August 6, 2010, from <http://www.youtube.com/watch?v=bEimB0IB-Zo&feature=related>, entitled “Mtn Biking Mountaintown Creek Trail,” posted by p4p4b34r

As part of our comments, GFW sent the FS a link to a YouTube video posted by bikers concerning a ride down Mountaintown Creek Trail. This video, complete with dramatic music, showed riders hurtling down the upper reaches of the Mountaintown Creek Trail and hopping their bikes up and down in the creek. The FS response was:

Forest Service employees, both recreation and resource specialists, looked at these videos and determined that the manner of riding is not a concern to the trail or the water resources. Also, it should be noted that only a short piece (1 minute, 35 seconds) of the almost 8:00 minute video shows the Mountaintown Creek trail. The remainder of the video was on the Windy Gap Trail, the Vista View Overlook, and an unknown area with a picnic table.

GFW did not create the video but merely sent the link along. We are well aware that parts of the video were shot on Windy Gap trail and elsewhere. The opening footage showing the speeding riders is clearly the top of Mountaintown Creek Trail, and the part showing riders playing with their bikes in the creek is definitely occurring in Mountaintown Creek.



Video taken August 6, 2010, from <http://www.youtube.com/watch?v=bEimB0IB-Zo&feature=related>, entitled "Mtn Biking Mountaintown Creek Trail," posted by p4p4b34r

It is astonishing to us that the FS finds no fault with this behavior. Backpackers are correctly cautioned not to wash their dishes or bathe in the creek, but the FS finds no fault with a bike with a greased chain and gears being deliberately bounced up and down in a creek. Every fisherman, hiker and hunter that has viewed this video has found the behavior improper, particularly in one of Georgia's finest trout streams.



Taken August 6, 2010, from <http://www.youtube.com/watch?v=pP9ClQteA-A&feature=related>, entitled "Bear Creek Mountain Town," posted by ziuruiz



Photo shows part of the Mountaintown bike trail that fords Mountaintown Creek. Note the erosion of the banks that spreads a significant distance on either side of the trail. Photo taken by David Govus August 2007. With the increase in use by mountain bikers caused by the adoption of options 1 or 2, sedimentation/siltation issues are bound to increase. Evidence for this comes from the FS itself.

The EA states on page 15:

Some of the soils in the analysis area are rated as having a high surface soil erosion hazard relative to other soils on the Forest (Forest Plan). This rating is for conditions without any forest cover or any mitigation measures. However, the FEIS notes that “maintaining organic cover mitigates this.”

Of course, when one is analyzing a bike trail, there is no organic cover, because bike traffic and constant braking on steep slopes in particular remove all organic matter.

The EA also states on p 18:

Sediment is the best measure to determine the effect of management activities on water quality and its associated beneficial uses on forested lands (Coats and Miller, 1981)

but then goes on to say on page 19,

Water quality is good in all three streams, but there are localized areas of degraded stream habitat. The North Carolina Biotic Index (NCBI), an index frequently used to rate water quality, rated all macro invertebrate sample sites as excellent, but the NCBI is not sensitive to impacts from sedimentation (Overton 2006). Metrics such as percent clingers, which are more sensitive to sediment impacts (Longing et al. 2010), varied widely within and among streams, suggesting localized sediment impacts (Roghair 2010). The heterogeneous nature of these streams makes it particularly difficult to detect perturbation using macro invertebrate metrics.

Reading the above, coupled with this statement on page 41:

These biological data provide a snapshot of stream conditions and water quality in the project area, and can provide a baseline for future monitoring. Each site was sampled one time, in 2009. With only one sample, it is impossible to assess trends, and overall stream health is also difficult to determine.

So, what can be concluded from these statements other than the FS did an inadequate job of determining the present impacts of siltation on Mountaintown Creek and that increased cumulative, long term impacts are not possible to assess? Despite the lack of previous data on stream health, anyone can clearly see from visual observation that the trail bleeds soil into every crossing.

GFW members hiking out of Mountaintown during a rain event have, on several occasions, noted that while Mountaintown Creek ran relatively clear, Bear Creek ran red with silt. GFW

mentioned this in its comments and the FS replied, on page 75 of the EA, that, “The water quality in Bear Creek is outside the scope of this analysis.”

We think that this reply to our comments is short-sighted and violates the very core principles of NEPA. Bear Creek has a network of bike trails, some of which are in the riparian zone, and several stream crossings, though not as many as the Mountaintown Creek Trail. The Bear Creek area is used almost exclusively by bikers these days because hikers have apparently abandoned the area as bike traffic has increased. This has occurred despite concerted maintenance by mountain bikers. The impact of Bear Creek’s loss of water quality is less than it would be on Mountaintown, which offers some of the best wild trout fishing in the southeast.

Providing a legal outlet for the Mountaintown Creek bike trail will increase bike use, and over time, it is reasonable to assume that the Mountaintown Creek Trail will come to resemble the Bear Creek trails. Also it seems that the silt load deposited in Bear Creek during a rain event should be of interest to the FS and the public.

The EA, on page 24, discusses the erosion trenches caused by bikes as their rough knobby tires spin entering and leaving the stream crossings:

There is a specific issue of concern with mountain bikes related to stream crossings (J. Marion, per. comm.). Without maintenance, V-shaped erosional trenches can develop by knobby tires being cranked as the rider leaves the water/crossing. Continued use of the upper Mountaintown Trail by mountain bikes would result in development of these trenches over time unless the trail is properly maintained.

These trenches are not a concern for the future but rather a current concern, as the picture below demonstrates. This picture is taken where the Mountaintown Creek Trail crosses Heddy Creek.



This picture was taken by a GFW member in 2008. The trench, caused by mountain bikers, existed in 2000 and exists to this day.

The EA states on page 26;

Removal of mountain bike use on the trail would result in less erosional trenches that can form from mountain bike use because mountain bike use would be eliminated on all 22 crossings. In alternative 2, mountain bike use is eliminated on 8 crossings. These trenches can be sediment sources and indirectly affect aquatic habitats. With maintenance the overall effects from stream crossings can be minimized. The recent heavy maintenance contract implemented on the upper trail treated 11 crossings. Treatments included re-grading erosional trenches and treating approaches with geotextile and #57 stone. These regular treatments and maintenance are recommended for all crossings to minimize effects from erosion and sedimentation.

The EA is replete with statements such as this that indicate erosion and sedimentation from bike use will be mitigated by regular maintenance. In point of fact, there has been no regular maintenance on the trail from the time bikes began using it until the recent reconstruction with heavy machinery in late summer of 2009 on part of the upper section of the trail.

Even if the FS maintains the trail, maintenance will cause sedimentation. However, it is most likely the FS will be unable to maintain the trail, because the track hoe can't reach a major

portion of the upper trail even if funds are found to hire a contractor again. The question the FS should have addressed, rather than claiming the trail would be maintained in the future is whether the trail design is such that it is sustainable. The agency and bike organizations have limited manpower and funding. It is becoming increasingly clear that good trail design is the only way to have sustainable trails and maximize limited maintenance resources. Again it seems the FS has its mind made up rather than weighing all the consequences. The FS has countered GFW's suggestion of using maintenance methods with less impact.

This 2009 maintenance with a small track hoe resulted in a pulse of sediment into the creek, as the EA notes on page 40:

Short-term, localized soil movement occurred following a heavy rain during the contract period, but effects were minimized as much as possible by reseeding, mulching, and additional hay bale placement.

This reconstruction halted less than halfway down the creek because one of the fords is the site of a collapsed bridge and the track hoe could travel no further.

Despite a statement in the EA to the contrary, several of the fords are sites of old bridges and provide significant obstacles to bike passage. This can clearly be seen on the video submitted by GFW, as part of our response to the original scoping, demonstrating an aggressive biker trying to churn his way up one of these steep fords. The resulting erosion will only increase as access is provided to more riders, who are likely to be less expert.

See <http://www.gafw.org/mountaintown.html>

This reconstruction work performed last summer cost nearly \$20,000, not counting FS staff time. In selecting alternate 2 as the preferred alternative for mitigation of the effects of bike travel, the FS is counting on continued regular maintenance, which has never happened in the past. GFW members walked through the Mountaintown Creek Trail with Forest Service personnel Larry Thomas and Larry Lockett in 2000, and there was no sign of previous maintenance.

We have testimony from this bike rider blogging in June of 2009 (before the reconstruction) about the lack of maintenance:

Start of trail looks is no longer singletrack and it looks like a bobcat had been doing recent work. First part of the trail looks as if it was freshly constructed (meaning that it was very soft and mushy with bobcat tread marks everywhere). It also looks like there is no longer a trail maintenance, as the were about 20 times where I had to get off the [bike](#) to navigate fallen trees. If you include all the creek crossings, it feels like you are off the bike just as long as you are on it. Mountaintown still has it's moments but it is nothing like it used to be

http://trails.mtbr.com/cat/united-states-trails/trails-georgia/trail/PRD_167624_4541crx.aspx

("Soft and mushy" is a reference to the work done by the district to restore rolling water dips on a small portion of the very top of the trail immediately prior to the reconstruction work by the contractor. This small section of the trail was used as a haul road when the Forest Service clearcut 200 acres of the top of the watershed in the 1970s. The work done by the district was

well done, but it affected a very small part of trail and is the only maintenance we have noted by the district in 20 years prior to the partial reconstruction last year. Ironically as the biker testimony in an early section notes, these rolling dips are used by bikers to launch themselves airborne. We are sure this is enjoyable for the bikers but perhaps less so for a pedestrian encountering a flying bike.)

With a history of no maintenance, the FS proposes to mitigate the effects of its action with future maintenance, yet on page 52 of the EA, it only budgets \$860 per year for this maintenance—this, despite the fact that the only maintenance performed on the trail in the last decade, if ever, cost \$20,000 and only covered a fraction of the creek. The Forest Service has a huge backlog of deferred maintenance on both its trail system and its road system, and it is not reasonable, in the current economic climate, to expect that its budget will increase.

GFW recommended that instead of using expensive heavy equipment to maintain the trail, traditional log water bars that could be cut on site and installed by volunteers, be used.

The FS, on page 73, dismissed this idea:

The USFS Trail Construction and Maintenance Notebook (2007 Edition) recommends the use of rolling dips (drain dips), particularly on steeper sections of trail as opposed to water bars, including log water bars. This document states, under the section titled “Dips Are In, Bars Are Out, “For existing trails with water problems, we encourage the use of rolling grade dips... instead of waterbars.By design, water hits the waterbar and is turned. The water slows down and sediment drops in the drain. Waterbars commonly fail when sediment fills the drain. Water tops the waterbar and continues down the tread.

In a perfect world, where money is no object and track hoes are on call, this might be true, but this is not the situation with the Conasauga ranger district. A track hoe can probably create a rolling water dip faster than a volunteer can cut and place a log water bar but the track hoe has to be hired and walked in, disturbing the treadway the entire distance. A volunteer or staff can walk in with no impact. The FS correctly acknowledges in the EA that the rolling dips will fill in. How will they be cleaned with no track hoe? Log bars can easily be cleaned by man power. Log bars, though cheaper and more realistic, are disliked by bikers.

Far from taking a hard look at the consequences of its actions, as NEPA requires, the Forest Service is relying on an improbable series of events to occur in the future to mitigate the effects of its actions.

This reliance on heavy equipment that the Forest Service does not own to work in the riparian zone also ignores the legal issue this raises. The Forest Service apparently should have applied for and received a variance from the Georgia EPD or local authorities to use heavy equipment in the riparian zone while doing this work within the streamside buffer zone. The Forest Service acknowledges this heavy reconstruction released a pulse of sediment into the stream. Will such permits be issued in the future and do these actions violate the Clean Water Act?

On page 48 of the EA, the FS states that if bikes are eliminated:

This could possibly result in minor improvement to aquatic habitats via less sedimentation, but as stated above, the effects of hiking and mountain biking are known to be similar, regarding erosion and vegetation effects.

Earlier, the EA refers to the fact that all studies have shown that the effects of hiking and biking regarding erosion and vegetation effects are similar. What studies? Two studies are cited by the International Mountain Biking Association (IMBA) to support this assertion. One by Wilson and Seney (partially funded by the IMBA) and the other by Chui and Kriwoken. Both studies are flawed in that they studied bike travel on relatively flat terrain with none of the braking, skidding and jumping that we know from the bikers' own blogs is a regular event on steep trails and on Mountaintown Creek Trail in particular. Steep trails, like Mountaintown, in areas of high rainfall and repeated severe downpours with highly erodible soils cannot withstand the present use or increased use as defined by the proposed action chosen by the agency.

In conclusion we believe the FS-proposed action will dramatically increase bike traffic on Mountaintown Creek Trail and sedimentation of Mountaintown Creek, intensify user conflict, and endanger hunters, fishermen, hikers and anyone who uses the trail on foot.

GFW recommends Alternative 3, which is more economical and protects the outstanding resources and remote experience of the many and various users of Mountaintown Creek, perhaps Georgia's finest wild trout stream.

Please notify us of any and all documents, decisions and other pertinent events pertaining to this important matter. Thank you.

Wayne Jenkins, Executive Director
Georgia ForestWatch

A handwritten signature in black ink that reads "Wayne Jenkins". The signature is written in a cursive, flowing style with a prominent "W" and "J".