

## Overflow Creek

**3,901 acres**

Overflow Creek area is in Macon County southwest of Highlands, North Carolina on the Nantahala Ranger District. The area borders the Chattahoochee National Forest in Georgia to the south and the Blue Valley Experimental Forest to the east. Overflow Creek is a congressionally designated Wilderness Study Area. It contains one of the three chief tributaries that join to make the West Fork of the Chattooga River, which is protected within the National Wild and Scenic Rivers System. This area, which adjoins the Three Forks Mountain Treasures Area in Georgia, provides important watershed protection to the downstream Chattooga River. There is much local interest in permanently protecting this area from development and from irresponsible forest management. There are numerous communities of old-growth timber in this area, especially in the isolated coves. The Bartram Trail crosses from south to north along the western side of the area. Glen Falls is a popular and scenic hiking destination that creates a “spray cliff ” habitat important for several species of mosses and liverworts.

### What’s at stake for this area?

A lot. Even though this is a congressionally designated Wilderness Study Area, and there is strong local support for it to be officially designated as a Wilderness Area, the Forest Service is proposing to drop it entirely from analysis. Please write to the Forest Service, urging them to carry this area forward for analysis and eventual recommendation to Congress. Let them know about your experiences in this area.

### Highlights from this evaluation

- The evaluation claims that this area is too small to manage as wilderness, which is wrong for at least two reasons. First, there is no size requirements for a wilderness area. Second, the evaluation ignores the fact that the Overflow Creek Wilderness Study Area is adjacent to other important wildlands in the Chattahoochee National Forest.
- The evaluation overstates the impact of 40 acres of timber harvest, 11 acres of maintained wildlife fields, and the Glen Falls trail on this 3,901 acre area.
- The evaluation completely underestimates the opportunities for solitude in the area by exaggerating the impact of adjacent highways and residential developments.
- The evaluation cites the presence of Forest Service Road 79 in the area as detracting from wilderness characteristics, yet The Wilderness Society has – on numerous occasions – proposed boundaries that exclude this road and the Glen Falls Trail from a potential wilderness boundary.
- The evaluation inadequately documents the ecological value of this area in terms of refuges for rare species (such as the green salamander) and habitat connectivity.

### Evaluation of Wilderness Characteristics and Corresponding Talking Points

Use any first-hand experience that you have to talk about how you have used this area. Remember to be as specific and informative as possible.

USFS Evaluation	How to Comment	TWS Evaluation Response
Apparent Naturalness		
Much of the Overflow Creek area has natural appearing forests, and hasn’t had any timber management since its designation as a Wilderness	*The Forest Service’s standards for assessing wilderness characteristics are too strict, which was rejected by the 1975 Eastern	The small amount of 21-40 year old forest will quickly mature and will soon be indistinguishable from other forest from the standpoint of apparent naturalness.

<p>Study Area in 1984. However, there are over 40 acres of timber harvest ranging from 21-40 years old, and almost 11 acres of currently maintained wildlife fields within the area. Glen Falls is a major attraction in the area with a highly developed trail and observation platforms along the multi-tiered waterfall. The Glen Falls Trail and wildlife fields detract from the area's naturalness. Another impact to naturalness is the cleared power transmission line to the northeast and northwest near SR106.</p>	<p>Wilderness Areas Act.</p> <p>*Tell the Forest Service that activities on a small fraction of an area should hardly disqualify the entire area.</p> <p>*Tell the Forest Service that you support the boundaries proposed by The Wilderness Society, which exclude the Glen Falls Trail from the potential wilderness area.</p>	<p>The Glen Falls Trail is excluded from the boundaries suggested by TWS.</p> <p>Any wildlife fields included within boundaries suggested by TWS (we question if there are any) would be incompatible with future wilderness designation, but this small acreage is a minor detraction from naturalness characteristics and certainly cannot be considered pervasive. It is not appropriate to consider management tradeoffs during the evaluation stage. Any wildlife openings included within proposed boundaries should be documented as minor detractions from the overall natural characteristics of the area.</p> <p>Power transmission lines are not at all apparent from within the area. Citing infrastructure outside areas as a detriment to natural characteristics, especially when those features are not apparent within the area seems tied to a "purity theory" rejected through the precedent of the Eastern Wilderness Areas Act.</p>
<p>Opportunities for Solitude or Primitive &amp; Unconfined Recreation</p>		
<p>Although there are pockets within Overflow Creek area offering opportunities for solitude, sights and sounds of adjacent highways, residential developments, and high visitor use at Glen Falls negatively affect those opportunities. Most of the adjacent development sits high above the area, with exposure to many locations within the area. Additionally, the open NFSR79 enters the area for over 2 miles from the southeast, and there are several maintained wildlife fields in the area. Sights and sounds of vehicles are evident along NFSR79, and occasionally</p>	<p>*The Forest Service claims that only "pockets" of this area offer opportunities for solitude. We disagree. Let the Forest Service know about your experiences in this area.</p> <p>*Tell the Forest Service their claims that "sights and sounds" of adjacent highways, residential developments, and high visitor use at Glen Falls are exaggerated.</p> <p>*The boundaries proposed by The Wilderness Society also exclude Forest Service</p>	<p>Adjacent highways are not visible from within the area, and vegetation screening prevents hearing highway noise except along the periphery of the area. The evaluation also clearly is using a "purity theory", rejected by the precedent of the Eastern Wilderness Areas Act in evaluating solitude. Similarly, nearby developments do not have a pervasive influence from inside the area. The Glen Falls area is excluded from the boundaries suggested by The Wilderness Society.</p> <p>The proximity of nearby Highlands and Scaly Mountain accentuate the need and value of this area for solitude and primitive recreation. The surrounding area's high recreation use will only grow and the need for unconfined recreation in</p>

<p>from equipment maintaining wildlife fields.</p> <p>Opportunities for primitive recreation exist, and the area is popular for hiking, backpacking, waterfall viewing, hunting, and fishing. However, NFSR79 almost bisects the area and limits opportunities for unconfined recreation. When considered with the relatively small size of the area, this open road creates a situation where there is almost no part of the area more than 1.3 miles from an open road or boundary. In fact, the distances between boundaries, or NFSR79 and a boundary are typically 1 mile or less.</p>	<p>Road 79.</p> <p>*Remind the Forest Service that there is strong local support for Overflow Creek to be designated as wilderness. They must analyze it in one or more alternatives.</p>	<p>such a place as Overflow will grow with it. The NC Bartram Trail Society supports this area for Wilderness as they believe it is the highest level of protection for the primitive and unconfined recreation potential they can obtain for the four mile section of trail that runs through the area.</p> <p>We object to the characterization that “NFSR79 almost bisects the area”. It is unclear what this means, and it is loaded language that prejudices the evaluation, which should be as objective as possible. Certainly NFSR is a factor affecting solitude that should be documented. However, similar open roads are not unprecedented for designated wilderness areas. Where is the 1.3 miles distance (or any distance) from a road a documented criteria for wilderness evaluation or consideration?</p>
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**Other Values - Unique or Outstanding Qualities**

<p>There are high elevation rock outcrops, cliffs, and waterfalls within the area, as well as forests with old growth characteristics. Overflow Creek flows through the area and is a tributary to the Chattooga River, which is a designated Wild and Scenic River. The 120 acre designated Glen Falls Scenic Area is within this area and is managed for protection and enhancement of the scenic resource. Glen Falls also supports a unique “spray cliff” habitat for several species of mosses and liverworts.</p>	<p>*There are 315 acres of old growth forest in this area, yet the evaluation only documents forests “with old growth characteristics.”</p> <p>*The evaluation also understates the ecological significance of this area. It is an important strong hold for rare green salamanders, for example.</p> <p>*Tell the Forest Service that it needs to permanently protect the headwaters of the Chattooga River.</p> <p>*Tell the Forest Service that it needs to consider the impact of climate change on species migrations. Remind them that the Overflow Creek area is contiguous</p>	<p>In addition to 315 acres of old growth forest and spray cliff communities, the area is now documented as habitat for green salamanders, which are proposed for federal protection. Several locations have been documented along the Bartram Trail in its preferred habitat of openings and cracks in large boulders, and there are likely other locations within the area as well.</p>
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	<p>with other important areas of the national forest, and protecting this area is important for habitat connectivity.</p>	
<p>Size &amp; Manageability</p>		
<p>At 3,901 acres, Overflow Creek area is smaller than stand-alone area size usually considered practicable for preservation and use in an unimpaired condition. The area is further divided by an open road, which almost bisects it and negatively affects opportunities for unconfined recreation. Impacts to solitude from surrounding land uses also degrade potential wilderness characteristics.</p>	<p>*The evaluation claims that this area is too small (it is under 5,000 acres) to manage as wilderness. Remind the Forest Service that there are, in fact, no acreage requirements for wilderness.</p> <p>*Tell the Forest Service that they have to consider the fact that Overflow Creek is adjacent to the Three Forks area on the Chattahoochee National Forest. This area is part of a much larger complex of wild lands and must be acknowledged as such. The Wilderness Society has brought this up in previous comment periods.</p> <p>*Again, remind the Forest Service of the local support for wilderness here.</p>	<p>There are no acreage requirements for Wilderness, and given the proximity of this area to other roadless lands these add to its significance and size.</p> <p>The evaluation fails to document adjacent lands that should be considered in conjunction with the Overflow WSA area. Overflow is contiguous with the Three Forks roadless area on Chattahoochee National Forest. This area would add significantly to the inventoried area if the inventory had been conducted across national forest boundaries. This larger area has been pointed out in previous inventory/evaluation comments submitted by TWS. Overflow Creek is an eligible Wild and Scenic river, is one of the three chief tributaries that join to make the West Fork of the Chattooga River, which is protected within the National Wild and Scenic Rivers System. With the Wild and Scenic Chattooga River and the Three Forks roadless area just downstream, this area joins a much larger complex of wild lands which adds to and enhances its significance and naturalness.</p> <p>The town of Highlands endorsed the protection of the area as Wilderness in 2010, as did the Highlands-Cashiers Land Trust, The Wilderness Society, and the NC Bartram Trail Society. Many other nearby organizations such as the Southern Appalachian Plant Society, Highlands Audubon, Franklin Bird Club, Nantahala Hiking Club, Stay and Play in the Smokies, and Outdoor 76 endorse and support this area for Wilderness and have submitted comments in recent months to the FS in favor of its designation.</p>

Conclusion

Overall, the Overflow Creek area does not have wilderness characteristics across most of the area. At only 3,901 acres the area is effectively bisected by NFS Road 79 which adversely affects manageability and opportunities for unconfined recreation. When these factors are considered together, it becomes evident that the Overflow Creek area is not of sufficient size to make its preservation and use in an unimpaired condition practicable. Highly developed trail structures and maintained wildlife openings detract from apparent naturalness. The area has impacts to solitude from sights and sounds of surrounding development, NC106, and NFSR79 and a high likelihood of visitor encounters given the area waterfalls and proximity to nearby resort communities.

\*Overflow Creek has obvious wilderness characteristics, and the fact that there is strong local support for this area should not go unnoticed by the Forest Service.

Conclusions in the evaluations that judge areas to have no wilderness characteristics are both factually wrong and procedurally inappropriate. All wilderness inventory areas have wilderness characteristics on a spectrum. Under the planning directives it is the task of the evaluation to “evaluate the degree to which” areas possess these wilderness characteristics. When the evaluation concludes that an area or a portion of an area “does not possess wilderness characteristics” this conclusion is false because all of these areas have demonstrable wilderness characteristics to some degree (often noted in other portions of the evaluation). This conclusion also avoids the task laid out by the directives for the evaluation to “evaluate the degree to which” areas possess these wilderness characteristics. Furthermore, this conclusion is being used as a decision point about which areas to take forward in analysis. Deciding which areas have sufficient wilderness characteristics to take forward into analysis is the task of subsequent steps. This is clear from the Forest Plan directives as well as other guidance around Chapter 70. To conflate the evaluation process with the selection of areas to take forward in alternatives is a fundamental error in the process outlined in the directives.

Local support for this area as Wilderness is strong, including the NC Bartram Trail Society, which maintains the trail and structures. Though there is high recreation use in the nearby area, Overflow represents an opportunity to escape the high use areas such as Glen Falls and escape for a hike on the Bartram Trail or to wade the waters of Overflow Creek. There are campsites along FS 79, but these are not numerous or

		<p>concentrated and the area remains a good alternative to the high concentrations of people around the numerous waterfall and natural destinations of nearby Highlands. The Bartram Trail offers great opportunities for solitude and unconfined recreation for those wishing to escape these highly visited areas.</p>
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