



Chattooga Conservancy
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SENT VIA EMAIL to sm.fs.aprd@usda.gov

District Ranger Robert Sitzlar
Andrew Pickens Ranger District Office
112 Andrew Pickens Circle
Mountain Rest, SC 29664

October 19, 2026

RE: Long Distance Trail Event feedback

Dear District Ranger Sitzlar,

Chattooga Conservancy submits the following comments in response to the stakeholder email received September 28th, 2026:

We oppose the permitted use of the National Wild & Scenic Chattooga River Corridor and certain areas of the surrounding national forests for commercial long-distance footrace events as proposed in the Andrew Pickens Ranger District (APD) email of September 28, 2026. After obtaining necessary details upon inquiry, we conclude that the proposed footraces would conflict with Sumter Forest Plan directives for special management areas, create potential resource damage through concentrated use, and inappropriately expand commercialization within the National Wild & Scenic Chattooga River Corridor and Ellicott Rock Recommended Wilderness Study Area. Further, evaluation of these new proposed commercial permitted uses of the Wild & Scenic Chattooga River Corridor requires preparation of an Environmental Assessment (EA), at minimum, to comply with USDA National Environmental Policy Act (NEPA) regulations and match Forest Service precedent. Finally, the stakeholder input process for these proposed permits has been inadequate; it sidesteps APD's responsibility to meaningfully engage the public in decisions that could alter the future management of a

National Wild & Scenic River. APD must make necessary details on the proposed commercial permits publicly accessible, ensuring robust and informed public comment opportunities.

First, information obtained by the Chattooga Conservancy upon request includes the following details critical to informed feedback on the proposed commercial permits.¹
[Chattooga Conservancy staff questions in black, USFS response in purple.]

Are these requests for commercial or noncommercial special use permits?

These events would be commercial events where participants would pay a fee to the organizer, and a percentage of proceeds would be collected by the Forest Service as per temporary Special Use Permit regulation.

What are the names of the organization(s) proposing this use?

There are two separate event proponents: Warrior Races (<https://www.warrioraces.com/trail-runs/foothills>) and Run Bum Tours (<https://www.runbumtours.com/appalachian200-100>).

When would the events take place?

Each event has a tentative proposed date in the late winter/early spring of 2027: the first is proposed March 10-14, and the second is proposed April 9-11.

Are the special use permits one-time, or recurring/ multi-year?

Each permit would be a one-time issuance. The Forest Service has made no commitment to permitting these or ANY additional events of this nature in future years or seasons. Our intent, if the determination is ultimately made to proceed with permit issuance for either of these proposed events, is to fully evaluate the outcomes of these before giving consideration to future such uses on the Sumter National Forest.

What are the proposed race courses? (Please provide exact trail descriptions and maps.)

Attached are maps showing each route as they cross national forest, and both routes can be viewed in greater detail on the respective websites for each event (above). The proposed Warrior Races event will be a simple out-and-back route using the entire length of the Foothills Trail; The Run Bum Tours event will cover more terrain, mainly using the Foothills

¹ Details (purple) from H. Morrison (Personal communication, October 2, 2026). While Chattooga Conservancy appreciates that APD provided the information upon request, this additional step should never have been necessary. The omission of critical information from the APD stakeholder email of September 28, 2026, severely restricts the public's ability to make an informed response and disqualifies the APD stakeholder email from meaningful public involvement.

Trail, Chattooga River Trail, Big Bend Trail, and Winding Stairs Trail on the Sumter NF and the Bartram Trail and Willis Knob Trail on the Chattahoochee NF.

How many participants would take part in each event?

Each race is proposing to *begin* with 100 participants at the respective starting locations outside the national forest. Each event will cover approximately 50 and 100 miles respectively before entering national forest (with the limited exception of a shorter option proposed by Warrior Races beginning at Oconee State Park),² and each is anticipating significant (~30%) attrition among participants along each route, so numbers are expected to be far less upon entering the forest.

In addition to the preemptive coordination activities referenced in APD's September 28 email, have event proponents begun to advertise or sold tickets for the proposed footraces?

Yes, each event proponent has begun advertising and presumably received some registrations from participants. The proponents have both been instructed by the Forest Service that the decision to issue a permit for either event has yet to be made pending this review process, and each has chosen independently to preemptively take these actions to promote their event in the hope that the permits ultimately will be issued.

Potential conflicts with Sumter Forest Plan prescriptions for special management areas:

Under 36 CFR 251.54(e)(5), the Forest Service “shall reject any proposal, including a proposal for commercial group uses, if ... [t]he proposed use would be inconsistent or incompatible with the purposes for which the lands are managed.” Each of the proposed commercial footrace courses enters three types of national forest area with special prescriptions: a Wilderness Area, a Recommended Wilderness Study Area, and the National Wild & Scenic Chattooga River Corridor. Management prescriptions in all three of these areas are incompatible with the proposed commercial footraces.

Wilderness Areas: Both proposed racecourses run along the boundary of and may enter the Ellicott Rock Wilderness. There are unresolved questions about whether the Foothills Trail

² This 75-mile racecourse appears to enter national forest land immediately after exiting Oconee State Park, under 2 miles from the start line. It enters the Chattooga River Wild & Scenic Corridor under 10 miles from the start line. As of 10/18/26, there are 27 registered participants in this option. The registration cap is uncertain—does the proposed “100 participants” number apply to the Foothills 75-mile Trail Run event individually, or to the combined total participants from the Foothills 75-mile and 150-mile Trail Runs?

crosses into the Ellicott Rock Wilderness Area. If so, the racecourses cannot be permitted as proposed, since commercial races are not allowed in Wilderness or Wilderness Study Areas.³

Recommended Wilderness Study Area: Both proposed racecourses run within the USFS-Recommended Wilderness Study Area “Ellicott Rock Extension.” If permitted, established commercial use might threaten the eligibility of the Ellicott Rock Extension from future designation as a Wilderness Study Area. This is inconsistent with management directives⁴ which emphasize preserving eligibility for designation. Moreover, according to the Sumter Forest Plan, “commercial and organized group size is limited to 12” in the Ellicott Rock Extension (Sumter Forest Plan standard 1.B.-11, p. 3-7). Participant numbers⁵ for both proposed commercial footraces clearly exceed this limit; therefore, the footraces cannot be permitted as proposed.

Wild & Scenic Corridor: Both proposed racecourses use the Chattooga River Trail through the Chattooga River Wild & Scenic Corridor. Sumter Forest Plan standard 2.A.-2 states that “organized events (such as boat races) are not allowed on the river” (Sumter Forest Plan, p. 3-9). In the absence of explicit permissions for land use, we believe that standard 2.A.-2 must prohibit commercial race events of all types inside the Wild & Scenic Corridor. Moreover, both proposed permits enter a *wild*-designated corridor segment. Management of wild segments “is focused on protecting the outstandingly remarkable values of the river and *preserving the natural environment and natural processes from human influences*” [emphasis added].⁶ The concentrated trail use proposed in these two commercial permits (possibly as few as 70

³ The Wilderness Act of 1964 states clearly: “Except as specifically provided for in this Act, ... there shall be no commercial enterprise ... within any wilderness area” (Section 4(c)).

⁴ “**Emphasis:** Manage this area to protect wilderness characteristics pending legislation as to their classification and provide for existing uses where compatible with protecting wilderness character” (Sumter Forest Plan, p. 3-6).

⁵ According to USFS (see p. 3), each race proposes to begin with 100 participants. [In the case of one of the footraces, 103 participants have already registered as of 10/15/2026, and event guidelines allow up to one “pacer” per participant, up to doubling the number of people on the course.] Even in the lowest-case scenario, accounting for 30% possible attrition, as suggested by USFS (see p. 3), and assuming NO “pacers” participate, this would still result in a minimum commercial group size of around 70. At most (no attrition, full use of “pacers”) this could allow a commercial group of up to 200.

⁶ The desired condition for wild segments continues, “Access to the area is limited to roads outside of the corridor. Non-motorized trails accommodate use and river access while protecting the resources and the river’s outstanding resource values. Canoeing, kayaking, fishing, outfitted use, hiking, backpacking, and wildlife viewing are all typical uses along some activities [sic] without seeing many other users except parts of this corridor” (Sumter Forest Plan, p. 3-14). We note that footraces are not accounted for among the “typical uses” of wild—or, for that matter, any—segments of the Chattooga River Wild & Scenic Corridor.

people, or up to 200 people with pacers,⁷ over less than 100 hours) would violate the desired condition prioritizing the integrity of the natural environment over human access.

We note that the Forest Service Order FMS: 08-12-00-25-07 (4/22/2025) prohibits “Entering or being upon the lands within the upper Chattooga National Wild & Scenic River Corridor in groups larger than... twelve (12) persons while hiking” except to “Persons with a permit specifically authorizing the otherwise prohibited act.” Authorizing a permitted commercial use of 100 participants, without any stated controls beyond predicted attrition and natural separation to “spread [participants] out from each other over a considerable distance”⁸ is a gamble, and incompatible with the design of the above Forest Order to safeguard the Outstandingly Remarkable Values of the National Wild & Scenic Chattooga River Corridor.

Potential resource damage: the events would concentrate more human activity along the proposed racecourses than typically occurs within a three-day period for many stretches in the Chattooga River watershed. Sensitive areas, like riparian zones and tributary creek crossings/fords might experience negative impacts from higher-volume use, particularly along areas of the Chattooga River Trail which were not designed to accommodate this volume of visitor traffic. High concentration of human activity may violate Sumter Forest Plan prescriptions for riparian corridors: “Exposed mineral soil and soil compaction from human activity may be present but are *dispersed* and do not impair the productivity and fertility of the soil” (Sumter Forest Plan, p. 3-40, emphasis added).

In the 2012, USFS estimated existing use in the upper Wild & Scenic Chattooga River Corridor as part of an Environmental Assessment titled *Managing Recreation Uses in the Upper Segment of the Chattooga Wild and Scenic River Corridor*. The Rock Gorge and Nicholson Fields segments (each traversed by one or both currently proposed racecourses) were each estimated to average 95 people per weekend day (peak visitation), or 40 people per weekday. The proposed commercial races could thus approximately double the peak daily use of these segments.⁹ This is a significant change, with potentially significant impacts on the natural and visitor-quality resources of these areas.

⁷ See footnote 5

⁸ APD stakeholder email, September 28, 2026

⁹ Moreover, in at least one of the two proposed footraces, use would likely be highest during a weekend day (Saturday), once participants in a delayed-start, shorter option joined other racers on the course. Management of the Wild & Scenic Corridor has historically restricted commercial use on weekends to accommodate private visitor experience.

Expanded commercial use of the Wild & Scenic Chattooga River Corridor and Ellicott

Rock Extension. The Chattooga River National Wild & Scenic designation and Recommended Wilderness and Roadless status of the Ellicott Rock Extension recognize the unique values of these two areas; these values include tranquility, solitude, and remoteness. Permitting new commercial uses risks setting precedents that would erode the integrity of these special values. While APD argues that the proposed races would be one-time, short-term events, the September 28 email acknowledges the opposite: that the proposed races could serve as foot-in-the-door test cases. According to the email, APD plans to use the events, if permitted, to evaluate “whether similar events could be permitted in the future.” The precedential impact of promoting these kinds of commercial uses in these sensitive areas, and the cumulative impacts and effects of allowing similar activities in the future, preclude any finding that such approval would be insignificant to the Outstandingly Remarkable Values of the Wild & Scenic Corridor and the wilderness resource characteristics of the Ellicott Rock Extension.

The proposed commercial races require, at the very least, preparation of an EA.

Chattooga Conservancy here incorporates by reference an organization comment from 2022,¹⁰ urging USFS to conduct a full carrying-capacity analysis of the Chattooga and Chauga River Corridors through an EA or Environmental Impact Statement (EIS). With respect to the current proposed permits, an EA is warranted under 7 CFR 1b.3(f):

USDA subcomponents shall consider relevant resources in the potentially affected environment for which an extraordinary circumstance may exist that would require the action to instead be documented in an environmental assessment (when there is uncertainty regarding the degree of effect) or an environmental impact statement (if it is determined there is a reasonably foreseeable significant impact)... The resources to screen for in the potentially affected environment when considering extraordinary circumstances may include, but are not limited to: ...Areas having formal Federal or state designations, such as wilderness areas, parks, or wildlife refuges; wild and scenic rivers; marine sanctuaries; national natural landmarks; inventoried roadless areas; or national recreation areas.

The proposed permits meet the criteria for extraordinary circumstances: they include areas with formal Federal or state designations,¹¹ and effects on these resources could be significant.¹² In fact, USFS even acknowledges uncertainty about resource effects from the

¹⁰ See attachment 1

¹¹ See above section, **Potential conflicts with Sumter Forest Plan prescriptions for special management areas**

¹² See above sections, **Potential resource damage** and **Expanded commercial use of the Wild & Scenic Chattooga River Corridor and Ellicott Rock Extension**

proposed permits, stating that permitting the events would “allow [USFS] recreation and natural resource specialists to understand any unforeseen impacts.”¹³ Critical resources like Wild & Scenic Rivers and Recommended Wilderness Study Areas should not be subject to impact evaluation through trial-and-error experiments. Instead, USDA NEPA regulations require evaluation of uncertain impacts to these special resources through an EA, at minimum.

When expanded boating use was proposed upstream of Highway 28, the evaluation process involved an Environmental Assessment. This was for a noncommercial use where visitation would be spread out over several months. Now APD proposes to permit *commercial* uses where many visitors would be *concentrated* within a mere few days, including weekend days (see footnote 9). Surely this proposed use warrants at least the same level of analysis which was applied to dispersed, noncommercial floating by the same ranger districts.

Inadequate public notice and documentation: By failing to provide necessary information (such as proposed dates, locations, and number of participants), in its email to stakeholders supposedly “seeking feedback to help identify potential issues or concerns,” the Andrew Pickens Ranger District has stymied meaningful public involvement. How can the public be expected to provide substantive input and “refine the scope and design of proposed activities,”¹⁴ without even the most basic information like **when** or **where** the activity is proposed? This gesture at public involvement is at best, weak, if not intentionally obscured. Finally, APD’s failures to publicly document these proposals mean that the administrative record for commercial permitting approval in the Wild & Scenic Chattooga River Corridor will lack critical information (such as would be disclosed in an EA).

Proponent advertising and ticket sales may violate Chattahoochee National Forest SUP procedures: As acknowledged in APD’s stakeholder email, the proposed “route of each event would use terrestrial trails in the Chattooga Wild and Scenic River Corridor as well as the adjacent Nantahala and/or Chattahoochee-Oconee National Forests.” Chattahoochee-Oconee National Forest special use permit procedures include: “The proponent, applicant, or permit holder understands and acknowledges that no operations, including advertising, can commence until all documentation, payments, etc., have been received by the Forest Service,

¹³ APD stakeholder email, September 28, 2026

¹⁴ *Id*

approved by the Authorized Officer, and the Permit is issued prior to the operating season.”¹⁵ For the proposed commercial footrace entering Chattahoochee-Oconee National Forest, not only has advertising begun, but tickets have sold out, with 103 participants registered, as of 10/15/26. This appears to violate Chattahoochee National Forest SUP procedures.

Chattooga Conservancy supports balanced recreational use and access in public national forest lands; long-distance trail running is one of many such important recreational uses. However, there are specific management areas within the Chattooga River watershed where new commercial and concentrated use is incompatible with land management directives and/or warrants evaluation through an EA or EIS. For these and additional reasons enumerated above, Chattooga Conservancy urges APD not to permit the commercial long-distance footraces as proposed.

Thank you,
Chattooga Conservancy

¹⁵ Obtained from USDA Forest Service. (2025, April 14). *Chattahoochee-Oconee National Forest - Special Use Permits*. <https://www.fs.usda.gov/r08/chattahoochee-oconee/permits/special-use-permits>. (Accessed October 19, 2026)

Attachment 1: Chattooga Conservancy comment, July 27, 2022.



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SENT VIA EMAIL to SM.FS.r8fmssocom@usda.gov

Robbie Sitzlar, District Ranger
Howard Morrison, Recreation Management Specialist
Andrew Pickens Ranger District
112 Andrew Pickens Circle
Mountain Rest, South Carolina 29664

July 27, 2022

RE: File code 2720

Howard, Robbie:

The Chattooga Conservancy is submitting these comments regarding the requests from businesses called Daniels Discovery Tours (and presumably Shady Creek Expeditions, a Division of Daniel's Discovery Tours, LLC) and Southern Outlaw Adventures for temporary commercial special use permits for 50 service days for guided fly fishing trips on Andrew Pickens Ranger District (APD) lands, specifically on the Chauga River, and on the Chattooga River below the Ellicott Rock Wilderness. Daniels Discovery Tours is also requesting a commercial special use permit to run guided camping and hiking trips in these areas.

The scoping notice for these two requested commercial special permits (SUP) also indicates that any forthcoming permits could be "categorically excluded" from further analysis in an Environmental Assessment (EA) or an Environmental Impact Statement (EIS).

The Chattooga Conservancy disagrees with the dismissive process by which the Andrew Pickens District is addressing these commercial SUP applications. We strongly oppose categorically excluding the proposed, new commercial special use permit applications from analysis and documentation in an EA or an EIS, based on the Forest Service's erroneous assumption that issuing two more "temporary" commercial special use permits would have no "significant" effects on the recreation experience—as prescribed in both the National Wild & Scenic Rivers Act and the directives in the *Development Plan for the Chattooga National Wild & Scenic River*.

The Chattooga Wild & Scenic River Corridor has been set aside to protect a unique recreational experience, which is an outstandingly remarkable value (ORV) and leading component of the river's wild and scenic status. No new commercial special use permits should be granted until a full carrying

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capacity analysis for the Chattooga Wild & Scenic River Corridor is conducted through an EA or an EIS. In addition, the Chauga River Scenic Corridor possesses outstanding values that deserve recognition as well as special management and preservation measures.

⇒ Today, the pressure for commercial special use permits for capitalizing on these very unique recreation resources specifically for monetary gain has reached heretofore unprecedented levels. The Chattooga and Chauga River's special values must be guarded and protected through proper management that is based on a rigorous and valid carrying capacity determination, or these values will, in short order, be irrevocably degraded or even lost for present and future generations—through the tyranny of small decisions.

Current controversies, such as the recent commercial special use permit request for the ultra running “Shadows of the South” race, is clearly an indication that it is time for limitations on compatible uses. In this most recent controversy about commercial use, the Forest Service was in error and almost issued a special use permit for a commercial event that was simply not permitted by statute.

The needed carry capacity analyses would address some basic questions, including, for example:

- How much commercial special use could be permitted, before it negatively impacts the Chattooga's unique wild and scenic experiences? In other words, what is the carrying capacity for commercial use vis-à-vis the National Wild & Scenic Rivers Act and the directives in the *Development Plan for the Chattooga National Wild & Scenic River*?
- Currently, how many commercial use special use permits and user days are there for business operations inside the Chattooga Wild & Scenic River Corridor?
- Currently, how many commercial use special use permits and user days are there for business operations inside the Chauga River Scenic Corridor?
- How many commercial special use permittees and user days are currently licensed on public lands in the three national forests, specifically in the Chattooga River watershed boundary?
- Has the Forest Service studied or determined a carrying capacity for temporary and other commercial special use permits inside the Chattooga Wild & Scenic River Corridor?
- Has the Forest Service studied or determined a carrying capacity for temporary and other commercial special use permits inside the Chauga River Scenic Corridor?
- Is Forest Service considering allowing more outfitters to apply, and if, so how many?

We have asked the APD for much of this basic information, and have yet to receive it.

In 1972, during testimony in the US Congress about adding the Chattooga River to the National Wild and Scenic River System, the House Committee on Interior Affairs concluded that the greatest threat to the Chattooga River would be over-commercialization.

The *Chattooga River Development Plan* was published in the *Federal Register* on May 10, 1974, and states, under Recreation:

“The main attraction of the Chattooga River is its recreation opportunity and the chance to visit a whitewater river and experience solitude, adventure and challenge. Protecting and maintaining the aesthetic values of the river must remain of paramount importance. Development within the boundary of the Chattooga River must not detract from or destroy the natural beauty that makes this river

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different from other rivers.” Further, concerning limitations on compatible uses, it states: “Although current levels of all types of use create some problems, uncontrolled future use would probably result in safety hazards and a lowering of the quality of the recreation experience. When the need warrants, this will be prevented by the establishment of regulations limiting size, number, type, etc. to provide optimum use.”

The FY22 APD Fly Fishing Outfitter Guides scoping notice offers little specific information about the proposed new commercial special use permits. There is no mention of group sizes, length of stay, specific operating locations, specific trails targeted for commercial use, no information depicted on maps, no meaningful details concerning effects on “experience,” and no information about potential effects on the environment. In addition, the scoping notice’s statement that the proposed commercial SUPs should be categorically excluded because the proposed permits are “temporary” is disingenuous at best. Commercial interests often ask for expanded opportunities from forest managers to increase “established use” before permanent commercial use permits are issued. There is an axiom often used by experienced line officers in the Forest Service faced with making decisions about designated use that once given, it is almost invariably never retracted. We believe that the current commercial SUP proposal is not, in reality, being proposed as a one-time deal, but rather is a classic foot-in-the-door strategy to use a technicality for potentially railroading a commercial SUP without questioning its wisdom or performing adequate and timely analyses.

The cumulative effects of increased commercial use, by itself and in combination with other commercial and private uses, cannot be assumed to be negligible. In order to protect the outstandingly remarkable values of the Chattooga River, and uphold its status as a unique, protected and rare resource, the issuance of commercial special use permits must be carefully considered and examined. Increasing commercial use within the Chattooga Wild & Scenic River Corridor is in and of itself is a very significant and historically contentious issue. We request that no new commercial special use permits should be considered until a full carrying capacity analysis for the Chattooga Wild & Scenic River Corridor is conducted within an EA or an EIS. The Chauga River should receive similar carrying capacity considerations.

Lastly and importantly, it has come to our attention that both Daniels Discovery Tours and Southern Outlaw Adventures have been engaged in illegal, unpermitted commercial outfitting and guiding activities in the APD. For example, it has been reported to our office that Southern Outlaw Adventures has been operating on the Chauga River down to the Cassidy Bridge area, and Daniels Discovery Tours/Shady Creek has been ticketed and fined for illegal commercial outfitting and guiding activities in the APD. The Forest Service should not be engaged with commercial businesses that have track records of consciously and flagrantly violating the agency’s rules and directives.

Sincerely,



Nicole Hayler
Executive Director