

Chattooga River Public Comments

Dec. 21, 2005 - Jan. 29, 2006

Posted on Friday, December 23, 2005 at 8:50 Hours (Server time).

From: H. Kyle Anderson, CMA, CPA
Email: kanderson@ac.edu

Telephone Number: 864-231-2478

Street Address:
6514 Dobbins Bridge Road
Anderson, SC 29626-5709

Message Subject: Visitor Capacity Analysis, Upper Chattooga River

Message Contents:

Selective exclusion from Public lands sets bad precedent

I have been hiking, camping and paddling on the Chattooga River since 1975 because it is a reasonable distance from my home, challenging, and exceptionally beautiful. My 2 boys have had the great pleasure to grow up visiting the fish hatchery, swimming in the river and hiking along its trails their entire lives. I paddle primarily on weekdays rather than the weekend to avoid the overcrowding and to enhance the beauty of my frequent trips. I have the great hope that when my 9 and 11 year-old sons are old enough and skilled enough, they too will have the right to freely hike, camp, hunt, fish and paddle the Chattooga River. I believe that their rights are in considerable danger.

Hikers, bikers, paddlers, hunters, fishermen and campers all pay taxes and, as American citizens, we all have the right to use public property. As I found in some USDA Forest Service literature regarding the need for commercial outfitters to provide services to people lacking the skills to access areas of public land, "...the public lands belong to them, just as much as they belong to the residents living at the mouths of the rivers and canyons." It is an extremely risky path when you actively work to limit certain groups from using outdoor areas. All users of the Chattooga River love it, just for different reasons.

The Chattooga's headwaters are an important whitewater resource and I should have the ability to legally enjoy this beautiful place. The Agency's studies support the fact that year round boating above Hwy 28 makes sense for the following reasons.

- Boating is self-regulating based on precipitation and water levels.
- There are very few days of available river use each year so boating use would be minimal.

- No negative ecological or biological impacts.
- No significant capital expenditures for improvements are required.
- Slightly impacts only one user group (non-back country anglers) and that impact is stated in the document "that angler solitude from interaction would not be as much of a concern" and any interaction would be best measured in seconds.
- Other studies also show that backcountry anglers are less prone to fish at the higher flows that I would prefer as a boater.

If the ban on boating above Hwy 28 is continued, I can easily see the day when the USDA Forest Service decides that other activities such hunting and fishing should be banned for similarly bad reasons. The sad part is that those very people using my tax dollars to ban boating will find themselves paying for another group to ban their favorite activity.

Sincerely perplexed and sad,

H. Kyle Anderson, CMA, CPA

Posted on Friday, December 23, 2005 at 11:47 Hours (Server time).

From: Kyle
Email: kyle.bergner@us.army.mil

Telephone Number: 7039159271

Street Address:
NGCSU BOX 6452
Dahlonaga, GA 30597

Message Subject: Visitor Capacity Analysis, Upper Chattooga River

Message Contents:

I feel that eliminating such a large part of the river's usage would create a severe inaccuracy in the USDA FS Study-eliminating a major variable from the data would return statistically incorrect data.

Posted on Friday, December 23, 2005 at 22:08 Hours (Server time).

From: (Ben Waller)
Email: (resq3man@yahoo.com)

Telephone Number: (843-682-5123)

Street Address:
(59 Wheat Field Circle, Bluffton, SC)

Message Subject: Visitor Capacity Analysis, Upper Chattooga River

Message Contents:

I'd like to add some comments on the issue of boater restrictions above the Highway 28 bridge.

1) I strongly oppose the ban - both for the study and for the future - as it is arbitrary, capricious, biased, and exclusive, rather than inclusive.

2) The ban should be lifted to allow boating during the study period. It is impossible to measure boater impact on the headwaters while excluding boating! Do the scientific, ethical, and legal thing, and open the headwaters to boating for the remainder of the study period, and do it NOW!

2) There have been several comments from local residents urging the USFS to maintain the ban to promote recreational swimming for local children. They insist that floating will endanger their children. There are two reasons to discount these comments. First, the upper Chattooga is not in a LOCAL forest, it is in a NATIONAL forest. The locals don't have exclusive rights to the river or the watershed. Secondly, there has never been one documented case of a whitewater boater injuring a recreational swimmer anywhere, as far as I'm aware. I spend a great deal of time studying the safety aspects of whitewater floating, and if any such evidence exists, it is well hidden. Until proven otherwise the insinuation that boaters will injure swimmers is speculative, specious, and just plain wrong.

3) As for competing use and impact on the riverbed, there are at least two currently-permitted activities that have the potential for much greater adverse impact on the riverbed and environment than does floating. Those two activities are recreational swimming and canyoning. Recreational swimming is currently not regulated. The anglers don't seem to mind this activity, yet it consists of unlimited numbers of swimmers splashing in one spot for extended periods of time. This is much more disruptive to angling than a brief float past the fishing spot, and it is much more likely to occur at low-to-medium water levels when the fishermen are present than at the high water levels required for floating. That tells me that the anglers are being less than totally honest about their motives for wanting the ban to continue. Canyoning is an activity which involves exploring river canyons at low-to-medium water levels. It is essentially extreme hiking and swimming, supported by tec!

hnological gear. Canyoning includes rappelling, which is currently not restricted. Rappelling can remove bark, lichens, and mosses from trees, move boulders, etc. Additionally, there is canyoning can involve the use of artificial chockstones. These are made from metals that can damage the rock, particularly with repeated use in a single spot. Despite this, there seems to be no objection to these two activities, which demonstrably have more negative impacts on solitude, the angling experience, and the ecology than does boating. The anglers also complain about the loss of solitude, but boaters will impact this less than the ground access that is already legal for every other user group. I'd suggest that the USFS stop stocking the headwaters with non-native game fish...and then see how much time the anglers want to spend in search of solitude.

4) Another issue which has been introduced is the search/rescue/safety issue. There is no reason to restrict floating above Highway 28 based on any safety or search & rescue potential.

A little about my background here. I'm a career rescuer, firefighter, and certified paramedic with over thirty (30) years of experience. I am a certified rope rescue and swiftwater instructor. I have many years of experience as a whitewater paddler, raft guide, hiker, and rock climber. I was a member of a wilderness technical rescue/swiftwater rescue team in a nearby Upstate county for over a decade, with two years as the team leader. I had more than 15 years of similar experience in the southeast Tennessee mountains, so I'm no stranger to the type of wilderness search, technical rope rescue, and swiftwater rescue missions that occur in mountain wilderness areas. I've performed many rescues in areas less accessible than most of the Chattooga headwaters, with no motorized vehicle assistance. In that time, the vast majority of the serious accident victims were hikers and/or campers. Most of the floating accidents were minor, involving assists by fellow boaters rather than

than any real rescue or medical effort. That will be true for the Chattooga headwaters as well.

5) There have been very few serious whitewater accidents on the rest of the Chattooga in the recent years. Most of the serious Chattooga accidents and the greatest number of fatalities occurred in the first 15 years of use, when whitewater boat technology, river-running experience, river safety techniques, gear, and instruction, and paddling and river safety instruction were very limited compared to today's norm. In recent years, two of the last three fatalities were hikers, not floaters. The incident that had the most negative impact - BY FAR - on the Chattooga was the prolonged body recovery at Raven Rock. That victim was a hiker, not a boater. It is speculative and specious to argue that there will be a high number of serious boating accidents and/or fatalities if the headwaters are opened to floating.

As for the impact on the local search and rescue resources...with the exception of one person, I haven't heard that any of the local SAR folks are against eliminating the boating ban. I know some of them personally, and they seem willing and able to accomplish the occasional river rescue, should one become necessary. Personnel costs are typically have the largest impact on search & rescue activities. Since most of the Oconee County and Rabun county rescue professionals volunteer their services, that potential budget impact is eliminated. The remaining costs are typically incident support costs for food, hydration, and incident support facilities/base camp for the operation. Those costs are pretty minimal for virtually all SAR missions in the Upstate and NE Georgia, and the Chattooga headwaters impacts are not likely to be any greater. The exception is for epic campaign incidents like the Raven Rock body recovery, which was a hiker. Note: I'm not asking for hikers to be!

banned from the Chattooga headwaters, even though there are many more hikers in the gorge than boaters, and even though hikers have measurable caused the most adverse safety impacts on the Chattooga in recent years. Additionally, the vast majority of river rescue incidents are never reported, as they are minor in nature, and handled by other paddlers without any impact on the local 911 emergency response system.

6) In my more than quarter-century of rescuing people in the mountains and mountain rivers, the vast majority of the victims were hikers or campers who were unprepared for anything to go wrong in a remote mountain wilderness. That is still the norm for many of those users. Whitewater boaters, however, fit a different category. Whitewater boaters have safety built into everything they do!

The first things you learn in paddling instruction are safety, safety, and more safety. Self-rescue, whitewater swimming safety, always wearing personal protective gear including a PFD, helmet, and appropriate thermal protection are normal pre-requisite training prior to the first time in a whitewater boat. Safety issues from controlling your boat, avoiding obstacles, safe river navigation and scouting, and assisting other boaters who may need an assist are basic parts of any reputable paddling program. Virtually every paddler who runs Class III rapids and above has additional safety training, including basic or advanced swiftwater rescue, CPR and first aid training, and basic rope rescue training. A high proportion of the swiftwater rescuers in the SC Upstate are also recreational kayakers, canoeists, and/or raft guides in addition to their fire/rescue and/or EMS duties. These individuals uncomplainingly spend many hours per month in training and performing wilderness !

and river rescues, then return to the river for an enjoyable day floating. The logical implication here is that opening the headwaters to floating will actually INCREASE the safety margin, as non-local rescue professionals will likely spend time floating the headwaters. Their presence will further lessen the chance of negative impact on the local rescue systems. Paddling rescuers go prepared for a rescue, are usually on the scene for minutes or hours prior to the local 911 system, and can provide extra trained resources in the unlikely or occasional river emergency.

Additionally, the boaters are the best prepared to be in the water at the high water levels that will be required for floating. I'm much more concerned about a child swimming in the river and being swept away or an angler falling into the river and being dragged to his/her death by angling gear than my minor concerns about whitewater paddling accidents. One very pertinent example - the Hiwassee River in southeast Tennessee is the home to many fly fishermen and whitewater boaters. The Hiwassee is a flatwater to Class II river - much easier on all users than Section 00, 0, or I of the Chattooga. Yet, EVERY fatality on the Hiwassee has been an angler! I anticipate that - once opened to floating - the Chattooga headwaters safety record will be very similar.

Another example; a National Park Service official in charge of the Great Falls of the Potomac area once stated "It is impossible to run Great Falls and live", or a very similar statement. This statement was associated with the arrest of a World Champion boater for floating the Potomac at flood stage. That arrest was quickly dismissed as soon as it went to court, as the judge ruled that it was illegal to block boater's access to using the river. At the time of the arrest, the boater was assisting in a search and rescue. His skills, river knowledge, and comfort levels were exponentially greater than those of the local rescuers, who admitted that they wanted him off the river due to their perceptions that the boater was in danger. I know this boater - a three-time U.S. Olympic canoeist, and there's not the slightest doubt that

he was able to play safely in waters that most folks wouldn't go near. The irony is that - at the time the NPS official made his statement, Great Falls had been run by hundreds of boaters without a single fatality! Yet the NPS allows hikers and other day users to climb on the cliffs, from which several of them have fallen to their deaths. That history provides a record of a federal agency mis-aiming its restrictions and enforcement efforts and budget where no such restrictions are necessary, fair, or even expedient. The mistaken stance the USFS is taking on the boater ban is no different - it's a classic case of READY, FIRE, AIM. Unfortunately that misaimed fire has been going on for three decades. Open the headwaters to unrestricted, year-round paddling, both for the study and for future. My children, my friends, and ALL of the user groups who enjoy the headwaters deserve no less.

Doing the wrong thing for a long time doesn't make it right.

Posted on Saturday, December 24, 2005 at 1:04 Hours (Server time).

From: Kory Haag
Email: kdhaag@msn.com

Telephone Number: 508-798-7010

Street Address:
17 Alpine Trail
Auburn, MA
01501

Message Subject: Visitor Capacity Analysis, Upper Chattooga River

Message Contents:

Dear sir,
I strongly believe that as a wild and scenic river, the Chattoga should be managed in a manner to allow for the continuation of the ecosystem. Allowing non-motorized, non-commercial groups to paddle the upper Chattooga waters will not negatively impact the ecosystem, and will allow another user group to experience the beauty of an undisturbed place. Thank you for your time.
Kory Haag

Posted on Sunday, December 25, 2005 at 14:01 Hours (Server time).

From: Brent Steadman
Email: brent.steadman@gmail.com

Telephone Number: (704)523-4914

Street Address:
3624 Annlin Ave
Charlotte, NC 28209

Message Subject: Visitor Capacity Analysis, Upper Chattooga River

Message Contents:

I have been involved in the upper Chattooga Watershed for years. I am happy to see that the unfair exclusion of boaters from the upper sections is being re-evaluated. I must stress absolutely that boating be allowed without restriction during the study period. Anything less than that will unfairly bias the results and not provide accurate data to make decisions on a new forest plan. I think that the USFS's goal should be that a fair, equitable, and nationally consistent river management be applied to the Wild and Scenic Chattooga River. To meet this goal the Forest Service must protect the ecological and scenic values that make the river special, while allowing all wilderness compliant uses to occur on the river. If use must be limited to protect the resource, than it must be limited equitably. The current management of the Chattooga is unfair and I look forward to improved river management in the future.

Thank you,
Brent

Posted on Monday, December 26, 2005 at 1:26 Hours (Server time).

From: Eugene Hacker
Email: Gene@krvproperties.com

Telephone Number: 760-417-1040

Street Address:
PO Box 2145
Lake Isabella CA 93240

Message Subject: Visitor Capacity Analysis, Upper Chattooga River

Message Contents:

As an active and traveling kayaker I hope this section of river would be opened to kayaking. Kayakers are generally a very responsible user group. The impacts would be minimal.

Thanks for your consideration.

Posted on Monday, December 26, 2005 at 12:45 Hours (Server time).

From: Michael Bamford
Email: (enter your email)

Telephone Number: (enter your phone)

Street Address:
(enter your mailing address)

Message Subject: Visitor Capacity Analysis, Upper Chattooga River Camping

Message Contents:

I have heard from discussions during the last meeting that kayakers would like to be able to camp overnight along the riverbanks.

In the AWA Appeal to the forest service The AWA states that " Boaters will not be camping" and uses this argument to obtain a favorable appeal decision. Since the decisions was based on the AWA's "no camping" plea, granting camping privileges would be prejudicial and inconsistent with their original argument that boaters used to have the RLMRP reviewed. The AWA argument is that because of the lack of camping that there would be no negative riparian impact.

Therefore, Camping Permits for boating should not be considered.

Please review and refer to page 14 of the AWA appeal to the Forest Service. see below.

"boaters will not be camping"

additionally

"This user group [boaters] does not generally camp from their boat during a run because the weight of the camping gear would at best impair paddling performance (for that matter, they usually would not carry much at all with them due to performance concerns)."

additionally

"Despite the fact that boaters will not be camping along their route or straying from the river bank, the ROD somehow concludes, without reference to any study or other authority, that boaters will engage in primitive camping and trample vegetation at isolated locations."

pam.richardson48@comcast.net

01/10/2006 10:49 PM

To Whom It May Concern,

We have spent many weekends in the Ellicott Wilderness and on Chattooga River Trail over the past fifteen years. We primarily hike, camp and enjoy the splendors of being in the remote wilderness. We enjoy the wildlife, especially the herons.

The Chattooga flows through the Ellicott Wilderness and is protected by both the Wild and Scenic River Act as well as the Wilderness Act . To my knowledge there is no other river that is granted this protection in the SC Piedmont nor in Northern Georgia.

One kayaker would not spoil our day nor would a few fisherman passing through. However, greater than twenty boats per day would ruin the experience currently enjoyed in the wilderness. Like trout, herons are easily spooked and are not quick to return.

Kayakers use all the other rivers in the area including the lower Chattooga. This is because all these other rivers are not granted the same protection as the upper Chattooga within the Wilderness. Most kayakers we have meet have been respectful of the wilderness, but why must they occupy every river.

If a river that is declared both "Wild and Scenic" and "Wilderness" can not be protected from potential overuse, then what river can be protected?

Please keep the Chattooga headwaters boating-free and heron-filled.

Sincerely,
Pam

"Lee Shop" <leeshop@sc.rr.com>
01/11/2006 11:12 AM

BACKGROUND

I am both a whitewater boater and a solitude loving backpacker & nature observer. Many boaters also love nature activities.

I was reading a bunch of anti boater articles & letters on a fishing site and they make a very good point that their solitude would be interrupted and that the public cost of rescue would be increased. But mostly, the article was about the "ugly" boater. <http://www.rabuntu.com/Rabun%20TU%20-%20TIGHT%20LINES%20January%202006.htm> I could tell stories of the ugly fishermen backpacker who left more trash at their campsite than one would think could be hauled in a couple of packs and the bones of about 30" trout (over the limit). There are ugly people in all sports and hobbies. The vast majority of the boaters I know are intelligent, educated, care for their fellow man and the environment. They are the kind of people that you like to be around.

I also know that there are some pretty technical and dangerous rapids on this river and that novice boaters and the beer bottle smashing bozos would best be kept from the river.

When the water is low, there is no reason for boaters to be on the river as it is too low for good boating. The water is high only a few times a year and then it is a good river for only the best boaters (probably better than me).

RECOMMENDATION

Effect a compromise that will allow usage by all interested parties. Establish strictly enforced rules for

1. Minimum river level for boating
2. Boating season

3. Minimum and recommended boater skill set. Set high standards to limit cost rescues and loss of life.
4. Minimum boat & safety requirements
5. Heavy fines and jail time should be the norm for violations, e.g., like hunting turkey out of season)
6. Work with the boating community to establish the above. Utilize recognized paddling clubs and the AWA.
7. Require registration and usage fee similar to state parks or Ocoee River.

Publish the above Chatooga River web page.

The vast majority of the boating community supports preservation of pristine wilderness. Work with them to establish what the guidelines should be. The good boaters do not want to see inexperienced boaters get hurt and need rescuing. Let the inexperienced learn elsewhere so they do not become a statistic.

- Lee

"Will Newman" <rnewman@plmtrailer.com>
01/16/2006 11:04 AM

Dear Mr. Cleeves,

I would like to take this opportunity to voice my opposition to allowing boaters on the upper Chattooga. I am an avid angler and very much enjoy the solitude of this stretch of river. It is one of the very few places left that one can go and enjoy the wilderness on a river of this size.

I have a number of friends that do kayak and canoe, though I do not. I understand and appreciate that they would like access to this stretch of water. My boating friends never have to think long about where to go to get to the kind of water that they like to go down, but I can assure you that for a fisherman, hiker, or wilderness enthusiast, it is becoming ever more difficult to find a remote place where there is only foot traffic. I have fished most of the streams in this area of the country for most of my life and there are very few rivers of this size that one can go to and enjoy the peace and quiet of the mountains without having someone paddle right through your line in a florescent colored kayak while whooping out loud at having come through a rapid. Often, they get mad at you for being in the way of their craft! I think the boaters have more than enough water to pursue their sport in, and this stretch of river in question should be left as it is.

I have been on this stretch of the river when the water is high and hard to fish, and I have read the argument that kayakers should be allowed on during these times. Any one that knows this river knows that the level of water can drop there quite rapidly making it almost impossible to predict when high water would be there long enough to boat on it. I have also read comments that boaters do not leave trash in the river, and I can tell you that I have on more than one occasion packed out broken paddles, and the occasional glove, etc, as well as the cans and trash left by other inconsiderate people.

In my opinion, it would be a very poor decision to open this section of the river to boaters. There are many scores of fishermen and others who feel the same as me on this subject and are just as passionate about this river. I can only hope that they will respond in kind to this issue.

Thank you for the opportunity to voice my opposition.

Will Newman

Posted on Friday, January 20, 2006 at 9:51 Hours (Server time).

From: Scott Camp
Email: jcamp7726@bellsouth.net

Telephone Number: 803.932.7726

Street Address:
PO Box 789
Chapin, SC 29036

Message Subject: Visitor Capacity Analysis, Upper Chattooga River

Message Contents:

Rafters, Canoeists, Kayakers, Tubers, and Rubber Duckies all have access to the river south of HW 28. And yes, I'm one of the above. But for once, do what's right for the river and keep the current restrictions in effect. I'm sure you know this is a unique place on the river. Christ, we have all of Appalachia to paddle! Personally, I think you should restrict the hoards of hikers, and fishermen that frequent the place (and yes I'm one of them too). So much for Wild and Scenic.

Posted on Monday, January 23, 2006 at 10:07 Hours (Server time).

From: Mitch Logan
Email: mitch.logan@northside.com

Telephone Number: 770.844.3224

Street Address:
2314 Meadow Isle Lane; Lawrenceville Ga 30043

Message Subject: Visitor Capacity Analysis, Upper Chattooga River

Message Contents:

Mr Cleeves-

It is my preference that the boat ban continue on the The Upper Chattooga River. Backcountry visitors want to preserve this unique resource of solitude. Thank you.

"Hal Herzog" <herzog@email.wcu.edu>

01/28/2006 06:29 PM

A recent letter in the Smokey Mtn News urged readers to write the Forest Service about letting kayakers have access to the upper Chattooga River. The author claimed that the river cannot accomodate both kayakers and swimmers.

The writer (Michael Bamford) does not know what he is talking about.

When the river is high enough to allow kayaks, it would be too high for swimming. There will be NO conflict between boaters and swimmers. Allowing both kayakers and swimmer access to the upper Chattooga is consistent with the multiple use mandate of the Forest Service.

Fisherman, swimmers, and kayakers co-exist very well on the Little River in the GSMNP.

Hal Herzog
Cullowhee

Posted on Sunday, January 29, 2006 at 15:53 Hours (Server time).

From: Kevin F. McGrath
Email: kevinmcgrath@mindspring.com

Telephone Number: 770-587-1621

Street Address:
3391 Windsong Court
Roswell, GA 30075

Message Subject: Visitor Capacity Analysis, Upper Chattooga River

Message Contents:

I support a boating ban on the Upper Chattooga River and continuing the March 1976 the Chattooga Wild and Scenic Development Plan prohibiting boating on the Upper Chattooga River above the Highway 28 Bridge due to "a detrimental effect on the fishing experience."

The Chattooga is a congressionally designated wild and scenic river. The Upper Chattooga is a unique pristine area. Boating, horseback, motorized vehicle access,... would significantly degrade the physical area and outdoor experience though user impact. As an angler who fishes the Upper Chattooga, I have safety concerns over mixing kayaks and canoes with fishermen. I agree with the Georgia Council of Trout Unlimited's position:

"The Forest Service planners had the proper solution for angler-boater conflict resolution in 1976 and 'zoning' by maintaining the boating ban is still the proper solution today. It has achieved solitude and harmony for visitors on the Upper Chattooga for almost 30 years. This unique solitude experience is shared without conflict among traditional backcountry visitors such as anglers, hikers, backpackers, bird watchers, swimmers, waterfall

viewers, and nature lovers. For the anglers, there is nowhere else they can go in the East that has the size and volume to permit quality trout fishing in a spectacular backcountry setting that is boating-free. The backcountry visitors want to preserve this unique resource of solitude and protect the natural resources of the only section of the Chattooga that has not been damaged by conflict and management for too many user groups. Zoning the space to ensure physical separation of visitors with differing and conflicting ways of experien!

cing the river and the environment is proper management; and it is also what is best for the future of the Upper Chattooga River."

Permitting boating of any kind exceeds my "Limit of Acceptable Change" (LAC).