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To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga Management Plan
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To Whom It May Concern,

Ever since I was a kid wading in creeks and camping in the woods, I have enjoyed National Forests throughout the southeast. Growing up our family frequently visited the national forest. The motto of the national forest, "land of many uses," fit with our family. We camped, hiked, swam in lakes, waded in creeks, paddled canoes, went tubing, rafting, fishing, and had endless fun. I can't remember my first family camp out or the first of many fish I caught with my dad as a kid, but I do remember enjoying being outside.

Fast forward a few years and as an adult with kids of my own I still enjoy the national forests throughout the southeast. I take Boy Scouts camping, hiking, and fishing. I take my own kids with me on family adventures where we appreciate the outdoors which seem lost to so many younger Americans. As an adult I can see the development pressures put on many of our forests, lakes, and streams. I can appreciate the protection offered by designating these areas as wilderness or wild and scenic rivers. These protections help to make sure that coming generations can enjoy the outdoors as I have.

As both a fisher and a whitewater boater I looked forward to finding out the Forest Service decision on management of the Chattooga Wild and Scenic River. I looked forward to a plan that would assess all users fairly and equitably. I looked forward to a plan that would restrict use where warranted in a way that was fair to everyone, keeping to the spirit of the "land of many uses."

After reading the draft Environmental Assessment and preferred management alternative, I am very disappointed. Both the draft EA and the preferred management alternative are unfair and inequitable. Neither of these documents keep with the spirit of the "land of many uses" and the original Wild and Scenic River designation as legislated by congress many years ago.

The Environmental Assessment unfairly scrutinizes boaters while failing to address the serious impact already present from other user groups. The document outlining the choice of alternatives goes into detail on possible boater impact with absurd possibilities such as plastic scrape marks on rocks. While scrape marks are a possibility, they pale in comparison to actual impacts from current user groups along the upper reaches of the Chattooga. Impacts from campers who leave trash and deadened fire circles are largely ignored. Impacts from hikers and fishers who trample riparian areas blazing trails to the river are also largely ignored in this assessment. The impact of fishing lines and lures left hanging in trees is not addressed. Perhaps the most glaring oversight is that no assessment has been made of the impact of stocking this wild and scenic river with non-native fish species. These non-native fish undoubtedly impact native plants and animals within the Chattooga corridor yet this impact goes completely unmentioned in the environmental assessment. The impact of those who wade into the river to fish or swim is also not included within this environmental assessment. Does wading through a riparian corridor for 6 hours fishing have a greater impact on plants and fish than floating over the same section of the river in a boat? This draft EA makes no serious attempt to assess the impact of fishers on the Chattooga headwaters.

One area that the study focuses on in great detail is conflict between boaters and those who fish on the river. In many rivers throughout the southeast, these two user groups use the same river corridor without significant conflict. On rivers such as the Tellico, Green, Nolichucky, Watauga, and Wilsons Creek, these user groups find a way to share a resource without significant conflict. In the case of the Choeah River, anglers and boaters worked together to establish a management plan for the river that resulted in a healthier river that both groups can enjoy. How can these user groups share the resource? In most cases, the conditions which are favorable to fishing (low flows) are not favorable to paddling (high flows). These groups choose which days to use the resource on their own without a strict set of rules because there is very little natural overlap. In the study, it becomes readily apparent that any time where boaters may have even a remote chance of using the resource when an angler may be present that the angler is given unfair preference.

In the Forest Service preferred alternative, much of the river continues to be completely closed to whitewater boating. The banned sections include the Chattooga Cliffs section which the original 1971 Wild and Scenic River Report describe as, "rafting or some method of floating is the best way to see this rugged portion of the river". Nowhere in the original report does it propose banning or limiting whitewater paddling along any sections of the Chattooga River. In instances where Alternative 4 does allow boating on limited sections of the Upper Chattooga, the limitations make boating logistically impossible for all but a few local paddlers. The proposal requires a level of flow which is only rarely met. On the rare occasions that this flow level is met, this alternative would severely limit the number of boaters allowed to paddle this extremely limited section. For those who do not live very close to the river, paddling the Upper Chattooga would require planning a trip. These severe limits on flow levels and numbers of paddlers would make it nearly impossible for non-local boaters to ever paddle this section. A more fair and equitable solution would be to allow boaters to decide for themselves when the level was conducive to paddling. This would allow paddlers to make the decision of when to paddle, much as hikers decide when to hike along the river, and similar to anglers who are also able to decide when to fish along this scenic public resource.

The length of the Chattooga River which is suitable to paddling and largely undeveloped is unique in this part of the Southeast. Opening the entire Chattooga to paddling would provide a river that could be completed over several days while camping. This is an appealing idea to those boaters, who, like myself, enjoy a wide range of outdoor activities which include hiking, fishing, and camping in addition to boating. The Upper sections of the Chattooga would provide a remote camping experience not available along Sections 3 and 4 of the river. The number of days per year when the river is at a suitable level for this type of activity is naturally limited. Artificial limitations placed on when to boat these stretches of river would make this activity logistically impossible for those of us who would enjoy paddling the river from its upper reaches to Lake Tugaloo.

In summary, the draft Environmental Assessment is incomplete as it does not fully assess all the current uses and impacts to the Chattooga River. The assessment is unfairly balanced against boaters and gives preference to the angling community. The alternative continues an unfair ban on much of the Upper Chattooga while placing impractical limits on flow and numbers of boaters on the small stretches that would be opened to boating. The 1971 Wild and Scenic River Report identifies whitewater paddling as one of the primary uses of the Chattooga River and never proposes limiting which sections should be open to boating.

I would propose that a complete and balanced Environmental Assessment be conducted by an impartial group. It is clear that the draft EA developed by the Forest Service is not complete, balanced, or impartial. Given that boaters have been unfairly excluded from the river since the arbitrary decision made over 30 years ago in 1976, the river should be completely opened to boaters while this study is conducted. This would allow the study to assess the actual impact of boaters instead of a hypothetical and assumed impact. Since boaters have been unfairly excluded for over 30

years, and entire generations of paddlers have missed the opportunity to boat the Upper Chattooga, use in the first few years will likely exceed long-term use and should be excluded from the assessment. An assessment of boater impact after boating has been allowed for at least 2 full years would provide a more accurate level of long-term boating activity.

Sincerely,

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