From:	Peter L. Oliver
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Subject:	Comments on Upper Chattooga Draft EA
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The purpose of my comments is to propose an alternative to the Forest Service's Draft Alternative 4 that will also accomplish its goal to protect and enhance outstanding trout fishing, by using a more effective and equitable method of minimizing conflicts between anglers and whitewater boaters.

I am not a member of American Whitewater but use their river flow reports and read their AW Beta internet publication. My primary environmental organization affiliation is with the Appalachian Mountain Club (AMC). I joined it in 1962 after moving to work for a management consulting firm in the Boston area. My initial incentive for joining the AMC was to access companions for whitewater canoeing and kayaking adventures in New England. Eventually I was asked to serve on AMC committees which led to six years of service on the club's board of directors, including two years as President in 1983-1984. As an AMC member I have always had good relations with USFS officials in the White Mountain National Forest regarding wilderness protection, trail maintenance and new trail construction. I also can empathize with anglers, having been an avid reel and spin angler starting in my teens and eventually became an intermediate level fly angler on West Coast streams and family lake canoeing trips in northern Maine.

Comment 1

My first problem with Draft Alternative 4 is that it stipulates a minimum mean daily flow level of 450 cfs at the Burrells Ford gage for boaters to run the upper river section from Chattooga Cliffs reach to Burrells Ford Bridge. This is at odds with the Expert Panel Field Assessment Report prepared by the Louis Berger Group, consultants to the USFS, in February 2007. On the second day of the field assessment panels of 8 anglers and 10 boaters surveyed the Chattooga Cliffs and Ellicott Rock reaches down to Burrells Ford Bridge at an average water level of about 375 cfs. At this flow rate, none of the fishing panelists opted to fish the Chattooga Cliffs reach above Bull Pen Bridge. However, one panelist explored a ¾ -mile stretch and stated that there were several places to fish, but access from the trail was difficult (steep slope and heavy brush) and the flows were too high to wade along the river. In the afternoon the panelists fished selected Ellicott Rock sections downstream from Bull Pen Bridge to Burrells Ford Bridge.

Afterwards the panelists stated that the gradient, flow and access below Bull Pen Bridge made angling difficult. However, fishable water was available at some locations, particularly for spin/bait anglers who could fish from the shore. The reach was challenging in terms of access and wading and some stretches were inaccessible (i.e. middle of the river, some crossings) at the 375 cfs level.

The panel of 10 boaters also ran the Chattooga Cliffs and Ellicott Rock reaches on day 2, starting at 10:30 am and finishing at Burrells Ford Bridge at 3:30 pm, a total of 5 hours. Follow-up surveys of the panelists found that their median recommended standard optimal low flow levels were 345 cfs for Chattoga Cliffs and 350 cfs for Ellicott Rock. The boaters described Chattooga Cliffs as a unique slot canyon. It does not resemble Section 4 of the Chattooga River because it is narrow, access is limited and the rapids are more difficult. The boaters felt that this section could not feasibly be rafted. The boaters characterized Ellicott Rock reach as a creek run that is more difficult than Section 4 of the Chattoga. They opined that this reach could be run by technical rafts, such as Catarafts, but that larger rafts would be impractical.

Based on the above findings, I conclude that a minimum mean daily flow level of 375 cfs would be sufficient to minimize conflicts between anglers and boaters in the Chattooga Cliffs and Ellicott Rock reaches. .

Comment 2

My next concern with Draft Alternative 4 is that it allows no boating in the Rock Gorge and Nicholson Fields reaches, from Burrells Ford Bridge downstream to the Highway 28 Bridge. However, the Louis Berger Group Expert Panel Report notes an option that would exclude boaters from the popular delayed-harvest fishing area but allow boating in the whitewater reaches above this area: The 9 kayakers in the Boating Panel said that they would prefer to take-out at Lick Log Creek and hike the 2/3-mile trail up to the parking area at Thrift Lake rather than paddle the Class 1-2 section to the Highway 28 Bridge parking lot. The only canoeist on the panel preferred to paddle the Class 1-2 section with his heavier craft, but the next day gamely carried it down the 1.7 mile trail to the Chattooga Cliffs put-in.

Comment 3

Based on the Expert Panelists, a minimum daily flow level of 375 cfs at Burrells Ford would also be sufficient to minimize conflicts between anglers and boaters in the Rock Gorge and Nicholson Fields reaches. This was the

average flow level during their survey. At this flow the anglers found that the section from Burrells Ford down to above Big Bend Falls was wadable. This section is wide enough that boaters can paddle a good distance away from wading or fly-casting anglers. No angler accessed Big Bend Falls or Rock Gorge because there were few places where they could move longitudinally along the river at this flow level. They also found that the Sim Shoals area was difficult to wade but was fishable from the bank.

The boater panel's average ratings predicted that optimal boating flows range from 350 to 600 cfs for both the Rock Gorge and Nicholson Fields reaches. The lower flow would provide a good trip for intermediate boaters learning how to paddle creeks. The panel felt that that this reach could be run with technical rafts. They also estimated that flows at 600 cfs and above would be pushy and make it difficult to scout/portage some drops. Both reaches were rated as more difficult than Section 4 of the Chattooga River.

Based on the above findings, I also conclude that a minimum mean daily flow level of 375 cfs would be sufficient to minimize conflicts between anglers and boaters in the Rock Gorge and Nicholson Fields reaches.

Comment 4
I agree with Draft Alternative 4's Boaters Group Size (2-6 boats) and also Groups Per Day (4 from County Line Trail Road to Bull Pen Bridge and 4 from Bull Pen Bridge to Burrells Ford Bridge); with the addition of 4 groups per day from Burrells Ford to the take-out at Lick Log Creek. I also suggest that to further spread out the groups the boaters be asked to aim at a minimum separation between groups of roughly a half hour.

Comment 5
In order for boaters, anglers and Forest Service personnel to obtain timely upper Chattooga River flow rates, it will be necessary to upgrade the Burrells Ford Gage or install a real-time electronic gage elsewhere that can be accessed either by phone' the internet or both. If the USGS is unable to fund this, I believe that Trout Unlimited and American Rivers are the best prospects for sharing the burden of getting the job done.

Comment 6
My final problem with the Draft Alternative 4 is the unbelievably short season allocated to boaters on the upper Chattooga River (Dec. 1-March 1). I fail to see why whitewater boaters cannot be allowed to run the upper Chattooga year-round, within the limits of the following criteria: a mean daily

flow of 375 cfs and above; excluding boaters from the crown jewel delayed–harvest area; controlling the groups per day and group size; and asking American Whitewater and local boating clubs to preach the gospel of adequate group spacing and the need to keep the maximum feasible distance away from anglers wading and casting in the river. I strongly urge that the Forest Service at least try my recommendation for one year and assess the number and severity of conflicts between anglers and boaters during each month before making a final decision.

Sincerely,

Peter L. Oliver