From:	George
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Subject:	EA & Alternate 4 Comments
Date:	08/18/2008 09:07 PM

I have reviewed the EA for the Chattooga above Hwy 28 & participated in 4 years of meetings, costing time away from my business. Besides my personal costs & time, the taxpayers of this country have spent millions of dollars on the same process. Millions of dollars for studies & a process mandated by the Forest Service's own reviewing officer in rejecting Sumter National Forest's previously flawed Management Plan. The reviewing officer stated a User Capacity Analysis be conducted before banning or regulating any qualified user group, in which it was stated boating was a qualified user group. Also stated was the ban or regulation of a particular user group must be founded in findings of said user capacity analysis.

Unfortunately, your office has wasted countless taxpayer dollars and time with the release of the recent EA document and your preferred alternative. Flaws are noted below and are certainly not limited to this list. An expert will find far more in the final analysis..

1. The EA and preferred alternate is a defacto continuation of the 30 year boating ban. The 450cfs "predictable mean daily flow" threshold is entirely subjective and likely to be a capricious enforcement/discrimination tool used against a particular user group.
Furthermore, the idea of predicting the flow in advance is an administrative nightmare. Any flow threshold needs be easily determined by the general public simply by reading the gauge at Burrell's Ford. The 450cfs flow is unsubstantiated by any documented evidence. The flow during the documented expert trial was 340 cfs (1.5') and the expert angler panel found this level to be too dangerous to enter many areas of the river. What and where is the documented evidence available for the 450cfs threshold?

2. The EA ignores findings by your agent (Doug Whitaker & Assoc.) that boating is a minimal impact activity, less than angling, hiking and camping. Your agent also found boating to not be an activity which had caused existing impacts, as it had not been present in 30 years. Where is the evidence documenting detrimental boating impacts?

3. The EA ignores the user study which determined, by boating and angling user trials, that the studied flow was boatable and angling was severely impaired by water level and turbidity, not by boating.

4. The EA notes the East Fork of the Chattooga is polluted below the Walhalla

Fish Hatchery, but offers no means or even need for correcting this unacceptable pollution of a natural stream, a National Wild and Scenic River and a federally designated wilderness area. Where and how is this being corrected?

5. The EA never addresses the harmful introduction of alien species into the stream or it's impact, non-native fish introduction. Nowhere does it note the Chattooga is not a native trout habitat, but exists only because of man's intervention in a natural area. Where is the evidence that trout ever inhabited the main fork of the Chattooga. Where does the EA address the visually & physically obvious impact of this activity?

6. The EA ignores the finding in the user capacity study noting anglers are the primary causes of user created trails along the river, contributing to siltation of the river. Why is this impact not addressed in the EA, steps taken to permanently eliminate it and stop the continuation of this practice?

7. The EA makes no mention of permitting or regulation of any other user group except boaters. This is highly discriminatory in nature and fact. The appeal decision implicitly states no user group can be singled out for special treatment without justification. What is the justification for singling out boating for permitting and imposing limits on boating?

8. The EA notes "adaptive measures" if the need arises in the future for other user groups. That need will be unknown without any monitoring of these user groups. The user capacity analysis documented damage from past inadequate management methods and the need for tracking user numbers by self permitting, yet again this has been ignored in the EA.

9. The EA states user created trails will be closed to further use, but does not offer any means of preventing their re-creation by the same user groups who created the trails in the first place. How will this be enforced?

Suggested changes to Alternate 4:

1. Allow boating at 1.5' (340cfs) on the Burrell's Ford gauge year round. The user study found no justification for anything higher and angling was severely impaired at this level and above. The study noted swimming at this level was difficult as well, except for a single individual who insisted on jeopardizing his life.

2. Self permitting/registration of any user entering the backcountry of the Ellicott's Rock Wilderness or Chattooga Wild and Scenic River Corridor. This is the only effective means of monitoring use and impact or determining when adaptive management changes are required.

3. Eliminate the requirement for "portage trails". The expert panel in the user trials were able to use river bedrock for portages. Eliminate any new parking, it is nor required for any user group, new or existing.

These are just a few of the flaws in the current EA and the preferred alternate. Legal and expert analysis will eventually highlight far more. The management of this resource is obviously for the benefit of a few and caters to their wants and is not responsible and fair resource management for all. This impasse was not created by the boating community. It was created by irresponsible or lack of any resource management by Sumter National Forest for the past 30 years and incompetent plans instituted by Sumter National Forest. This area is certainly endangered, but not by boating. Boating is banned and has been for 30 years. Boating has caused absolutely none of the damage to the resource factually documented in the User Capacity Analysis.

I have enjoyed this area for over 30 years. I have paddled this river, hiked, swam and fished it's waters and surroundings. Both of my children have grown up enjoying this resource in the same manner. My original position was opposed to the opening the Headwaters to boating for many of the same reasons espoused by current opponents of boating. However by investigation and attending countless meetings, I discovered just how poor prior management practices had been and how self serving boating opponents were. I also discovered these groups were the groups who had so severely damaged the river and environs I love so much. I also discovered they had no intention of changing their ways or the management of the Chattooga. Based on these existing users input at public meetings and public comments, it is apparent they desired their use to continue unabated and unmanaged as it had in the past. I know boaters, hikers, anglers, campers and birders. As a whole these groups are compatible and together they have worked side by side to preserve what little is left of our natural wild areas all over this country. Only few have damaged the headwaters and those few wish to continue, by any means necessary. They don't want boaters there because boaters will see what they are doing, document the damage and demand better management. I will take the side of those who wish to improve management and preserve our wild areas. I take the side of boaters in the headwaters, because they are the group working toward that end, not the current users. Many distortions have been put forth by the Georgia Forest Watch, The Trout Unlimited, the Whiteside Cove Homeowners Association and the Chattooga Conservancy. It is a real shame this has been done by formerly respectable wilderness advocacy groups. Statements and positions by these groups have bordered on outright lies.

Nothing in this EA is for the betterment of the Chattooga River. It is an EA in name only. It is a document that is a disgrace to wise resource management, preservation of our wild lands and every other unit of the National Forest

system. It is a defacto boating ban and nothing more.

This country cannot really afford for Sumter National Forest to waste anymore of our taxpayer dollars or mismanage our natural resources. I sincerely hope this fiasco results in those responsible losing their jobs. Unfortunately, incompetence in our government agencies seems to be institutionalized and impossible to remove. Not one Sumter official has the guts to stand up and do the right thing, only cave to special interest pressure. The Sumter National Forest Supervisor, Mr. Jerome Thomas, spoke at a focus group meeting to all assembled participants. He stated all use was being reevaluated, existing or otherwise, and was on the table. I mistakenly believed him. Was this an outright lie? Only boating is being limited in this EA and it is a minimal impact activity which is innocent of any existing damage to the resource.

I guess my grand children won't have this resource to enjoy and grow with as I and their parents have.

Thanks guys,

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