From: C Coleman
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cc: cheetahtrk@hotmail.com
Subject: Chattooga River Project Comments
Date: 08/18/2008 07:46 PM

U.S. Forest Service
Mr. Tony White
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.
comments-southern-francismarion-sumter@fs.fed.us

August 18, 2008

RE: Chattooga River Project Comments

Dear Mr. White,

On July 2nd, 2008, the United States Forest Service published an environmental

assessment ("EA") titled, *Managing Recreation Uses on the Upper Chattooga River*. These are my comments, concerns and summation of years of frustration in participating in the process to complete this project

"The Forest Service was specifically directed to 'conduct the appropriate visitor use capacity analysis, including non-commercial boating use, and to adjust or amend, as appropriate, the LRMP to reflect a new decision based on the findings' "

The direction says "including", as in there should be an analysis on all uses, that also includes a capacity analysis of boating. There was also a directive to study the capacity of the entire headwaters, which would mean including the 2 miles in North Carolina. In the business world,

someone would be standing in the unemployment line, for grossly ignoring a directive. Even more blatant is the original "no change Alt 1" NEPA mandatory alternative was changed and that violates the process from the start.

Phenomenal, it has taken more than the allotted time and there still is not a full capacity analysis. The true issue here is: the Forest Service, DNR, and Fish and Wildlife have created a monster that they cannot defend with facts.

The dear fishery is a fake, farce, and a manmade lure for the environmentally unfriendly. It is a river stocked with non-native species that are dropped from a truck or helicopter, after being taken from a cool water hatchery and then dumped violently into a warm river! When you stock fish in such massive amounts in such a manner you have done nothing but open the buffet at Ryan's for free. I have witnessed people from many other states carry off 48 quart coolers of trout. The children run freely to do whatever they want while the parents fill the freezer for the year. Why don't you just open the hatchery and give them a net. It'll save on paying the drivers, the pilot or for the gas to move the fish. It's much like the side of the road ruby mines. Set up so people can pretend to pan for rubies. People can pretend to be fishermen. In the mean time, the resource gets pummeled by non-environmentally educated users, which leave garbage, tear up trails and destroy foliage and disrupt nature.

Neither this user group, nor this process were studied at all, so it would be hard to find a carrying capacity for this group, since there is no data. There is also no data provided on what happens to those fish and if this practice does in fact help or hurt the resource's Outstanding Remarkable Values.

The Fishermen insist on division into spin bait fishermen and fly fishermen. I realize Jesus said "fishers of men", but he wasn't referring to this group as the chosen few, but they are being singled out and treated as a preferred group over all other groups for absolutely no reason and with no data to support the preferential treatment. They move woody debris and rearrange the riverbed to make the habitat for the stocked fish more attractive. Seems moving woody debris should be the same in either case.

My uncle's pasture makes great deer hunting, as long as it is full of corn! This isn't a wonderful natural fishery. It is a manmade private fishing hole that no one is willing to say, man this was a bad idea let's fix it. I'm sure the fact that Forest Supervisor Don Eng had no special motivation for closing the river in the 1970's, since he was/is an influential member of SC State TU and the Saluda River Chapter of TU when he made this decision? No, now it's millions of dollars, lots of wasted time and separation of two valuable user groups by an agency that should promote unity of interest.

Backpackers and naturalist were totally ignored in any attempt of a study at all.

Alternative 4 is laughable. "Predictable 24 hour average flow" is what I would call an arrogance past comprehension. Firstly, what does it "mean" exactly? Second, where did you dream up that water/rain could be predetermined in advance to the point of permitting or planning for a specific 24 hour period. I'm sure many weathermen would love this skill. Personally I take it as an insult to everyone's intelligence you thought you could get that "past" the public. If Alt 4 were even palatable it should have to be based on the river reaching the set level at all, in a 24 hour period and not some 24 hour flow average. It boggles the mind at how you expect anyone to predict such a thing. Does that inversely mean that if the river would in fact ever reach such a average, but the person in charge of predicting it, did not predict it as a boatable day, would it be boatable after the fact or would it not be boatable based on the lack of that crystal ball guess that was missed?

If the days were calculated for the level reaching the target at all in a 24 hour period how many days would that actually amount to? Could it be a frightening amount of as many as 20-30 maybe, on a rainy year, or 0-3 in year 3 of the worst drought in recent history?

Shards of plastic have suddenly taken the forefront as an environmental threat. Come now, this is really reaching for an excuse. Those synthetic lures, line and lead are bigger than any plastic shard I've ever seen. Not to mention the bait containers, inflatable mattresses, beer bottles and etc that are the norm there. DNR, TU and Fish and Wildlife help fund the fish stocking but do they give any for the resulting clean up required?

The only real study we have after so many years are the two done in 2002, by Clemson University at the request of the Andrews-Pickens District, on boaters and trout fishermen on "sense of place" and "substitutions available" for each group. Boaters in the study had a greater sense of place and fewer substitutable rivers. The Chattooga, for boaters, had only 2 other rivers that rated high, both dam controlled. Feeling of attachment was 87%, 41% had no substitution for the Chattooga and 64% said it was the best for their sport. The Chattooga was ranked #1 in the list of rivers. Boaters from all over the region were contacted for response to the survey.

Conversely, TU members, 51% said they held an attachment, 13% said they had no substitution, 23% of fishermen ranked the Chattooga as best for their sport, and they named19 rivers with 12 as better or equal to the Chattooga and the Chattooga was actually ranked 3rd. The only trout fishermen used in the study were from Rabun, and Chattooga TU. So proximity was a factor.

This set of studies is not referred to at all in the EA. My guess would be they proved boaters cherish the Chattooga more and these studies proved the fishermen don't truly, honestly hold the river that "high" in regard to their sport, just to their location.

Also, out of nowhere, with absolutely no basis for need, tributaries were arbitrarily closed to boating. Not only is there no data, there is no reason. The Scope of the Decision never included the tributaries and neither did the first RLMP. This closure seems almost a vindictive measure against boaters.

Lastly, I defy you to give hard documented proof, other than inadmissible hearsay/legend and campfire tales, that conflicts of a serious nature actually exist other than in the minds of grumpy old men, scared they may lose the private fishing hole.

Once again I request you open the whole river, let Mother Nature restrict the use, take a full set of permits from each use group and monitor the results. When you have some true data, then you can limited users according to level of resource damage they inflict and also create realistic encounter numbers from actual encounters. Also stop stocking non-native fish in a manner that leads to the increased resource damage. If you

aren't going to do it right, then just close it up for everyone, let it rehabilitate itself naturally and in a few years do a real EA and start from square one with everyone being equal in the name of truly protecting the resource.

Deeply mystified,

Sincerely,

Charlene Coleman

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fished for a life time

boated 26 years

whitewater rescue 11 years

instructor 18 years

CC: The Honorable Governor Mark Sanford

The Honorable Lindsey Graham

The Honorable James DeMint

The Honorable Henry E. Brown, Jr

The Honorable Joe Wilson

The Honorable Gresham Barrett

The Honorable Bob Inglis

The Honorable John M. Spratt, Jr

The Honorable James E. Clyburn

The Honorable John E Courson

The Honorable Jake Knotts

The Honorable Phil Leventis

Regional Forester Liz Agpaoa, USFS

When you have decided what you believe, what you feel must be done, have the courage to stand alone and be counted.
- Eleanor Roosevelt