From:	Rob Maxwell
To:	comments-southern-francismarion-sumter@fs.fed.us
cc:	akimbell@fs.fed.us
Subject:	Alternative #4 is still a boating ban, please support Alternative #8
Date:	07/16/2008 08:04 AM

Dear Sir,

Upon further research, I felt I needed to add an addendum to my comments on the Environmental Assessment -- Managing Recreation Uses on the Upper Chattooga River. Clearly, the preferred alternative #4 is a thinly veiled attempt to maintain the 30 year-old boating ban through an array of unjustified restrictions and a system that will be completely unable to determine if the headwaters reaches a daily mean of 450cfs. Thus, making it almost impossible for a day to be declared "boatable" by the Forest Services own standards! The Forest Services preferred alternative #4 is, in fact, a complete boating ban. Allow me to elaborate…..

The bottom of page 8 states:

"In this and other alternatives that consider boating at specific flow levels, the term "boatable day" is based on a PREDICTABLE 24-hour flow average rather than on a PREDICTION that the river may reach a certain flow level for a limited amount of time on a given day. For example, in Alternative 4, the corresponding number of "boatable days" is the estimated number of days when the water level would be PREDICTED to average 450 cfs over the course of a 24-hour period, not simply when the flow level is expected to hit 450 cfs for a limited time."

Furthermore, the FS estimates there will be an average number of 6 (a range of 0 to 11) boatable days for its alternative, #4.

From the Macon County News, July 14 2008:

""How is that (450cfs daily mean) going to be measured? Well, I don't know if all of that has been worked out yet," Seyden said. Sumter National Forest Public Affairs Officer Michelle Burnette said, "Currently, the agency is exploring a variety of ways to predict a 'boatable' day. If the preferred alternative is implemented, the agency will declare a 'boatable' day and will most likely post this information on the Forest Service Web site." She said a self-registering system would be put in place similar to the type used on lower portions of the river."

Read the full article at:

http://www.maconnews.com/index.php?option=com_content&task=view&id=2915&

What does all that mean? In order to reduce the average number of day's boaters might be allowed to boat the headwaters the FS has decided to use a daily mean instead of a set water level. A set water level can be easily checked; however a daily mean is more complicated and, conveniently, further reduces the number of boating days in the headwaters. The most accurate way to arrive at a daily mean is by averaging all the river level data from the previous day. But that would be too obvious a boating ban to declare a day boatable after the fact. So, what is left? PREDICTING the daily mean. How will the FS PREDICT the daily mean? Rainfall totals, of course.

The FS used several years' worth of Real-Time water level data from the FS Burrels Ford water gage to KNOW the river would reach a daily mean flow of 450 cfs 6 times a year on average. With that, they also know the average amount of rain it takes to make the headwaters reach a daily mean of 450cfs. When the PREDICTED rainfall totals are equal to the average amount of rain it takes to reach the 450cfs daily mean, the FS will declare a day "boatable". Anyone who's done river level correlations knows this is absurd! All accurate river correlations are based on USGS (or similar) Real-Time water level comparisons not PREDICTIONS. Correlating river levels based on PREDICTED rain totals is so inaccurate it verges on pure speculation.

Here's where the problem lies: Boaters have 6 boatable days on average. For argument's sake, let's say the headwaters will run after an average of 1.5" of rain. That means 50% of the time it will run when less than 1.5" of rain has fallen and 50% of the time it will reach runnable levels only when more rain has fallen. Since the FS will only use the 1.5" average, half of the estimated 6 boating days will be declared not boatable, because less than 1.5" of rain was PREDICTED! Now there are only 3 boatable days left!

Just because 1.5" of rain falls and the FS PREDICTS a day will be boatable, doesn't mean the river will came up to actual runnable levels. Ground dryness/saturation plays a huge part in how the watershed reacts to rainfall. In other words, boatable days are lost due to soil conditions and the natural margin of error in PREDICTING rain totals.

How rain effects a river also depends on how much fell and how fast. A long soaking rain affects a river differently than a hard short rain of the same amount. So, now the FS PREDICTS the river will be boatable, however, let's say the rain

came down in a single massive storm and not a slow soaking rain. The headwaters are declared boatable by FS rainfall total PREDICTIONS, but is in fact is too high to run safely and will drop to below runnable levels quickly. Rain events like this were used to arrive at the 6 boatable day average. However, this would not be a boatable day. Another day is lost due to the margin of error.

Let's now look at the timing issue. The FS estimated 6 days would be runnable. However, they did not make adjustments to this average for when the boatable levels were at night or too late in the day to safely run the river without running out of day light. If a day is PREDICTED to be boatable, yet the water levels reach boatable levels too late in the day or at night, boatable days are lost.

I also find it hard to believe, that the Forest Service Rangers will be vigilant enough to watch developing weather reports and predictions so that a boatable day won't be "accidently" missed. Boating days will be missed because Rangers go home at 5pm and predicted rain amounts will be adjusted as the rain events progress through the night. Boaters need timely and accurate information very early in the morning to decide on a river destination. It is clear that this will probably not happen within the Rangers normal work hours. Thus eliminating more boatable days due to human error.

Of all the PREDICTED runnable days, 71% will be on weekdays when, real people, with real jobs, and real lives won't be able to drop everything and head for the river. This conveniently eliminates 90% of all boaters.

Remember in the Macon Times article it said that when the headwaters are PREDICTED to be runnable the FS "will most likely post this information on the Forest Service Web site." This was the message I received on the FS website from 7/13/08 to 7/16/08:

"We are experiencing technical difficulties with our web site at this time. Visitors to the site may find that some information is outdated or unavailable. We are working to resolve this issue as soon as possible. In the meantime, if you cannot find the information you need, please call (803) 561-4000 or e-mail cforney@fs.fed.us. We apologize for any inconvenience."

Who knows how long that message has been up? Obviously, the FS is unable to guarantee accurate and timely information on their web site. Since the weather forecasts change rapidly, I doubt the Ranger's ability to have the "legal boatable days" posted in a timely manner as well.

In short it isn’t hard to eliminate all possible boating days by using inaccurate PREDICTIONS, and “lack of accurate and timely information” methods. By any other name, alternative #4 is in fact a boating ban.

I support restrictions and bans on user groups, provided they are justified and supported with competent scientific user studies and hard facts. The Forest Service has not completed such studies and continues to ban boating. The Forest Service has also not completed studies on the effects of stocking non-native aquatic species in the wilderness and the effects of the anglers stocking attracts. Yet, for some reason, they have supported this invasive practice for decades. This gives the appearance that the Sumter Forest Service is, at best, bowing to political pressure and an old-boy network and, at worst, is simply corrupt.

I am asking the Forest Service to abandon alternative #4. It is so blatantly and unjustifiably unfair and discriminatory that it invites a lawsuit that will only sap the limited financial resources of the Forest Service. Please don’t spend my tax dollars in this way. Use them to protect and preserve our wilderness fairly. As I stated in my previous comments, please abandon this unjust alternative in favor of Alternative #8.

Thank you –
Rob Maxwell
Atlanta, GA