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Subject: Comments on Chattooga Draft EA
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U.S.Forest Service
Chattooga River Project
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Gentlemen,

I've been paddling various sections and tributaries of the Chattooga since 1981 I have been active in this process since the late 1990's. I was also on the boater trials in 2007. I have read the pre-decisional Environmental Assessment for the Management of Recreational Uses on the Upper Chattooga River and find it lacking. Please consider my comments on the preferred alternative (#4) below. I have separated them into general and river reach specific.

General:

Parking -

I am very pleased that the USFS proposes to eliminate roadside parking within ¼ mile of the river at Burrells Ford. It doesn't appear to me the parking lots on both sides of the river will be closed. If those lots were closed or reduced in size, the human impacts on the area would be further mitigated.

Camping, Hiking & Registration -

I am extremely disappointed that the USFS did not require self registration from all users. The area near the bridges and camping sites already show significant impact from human use. That use is clearly not from boating or boaters. Without registration, the USFS can neither measure nor manage the non-boating users. It is unfair to one user group, and it emasculates the USFS's ability to manage the other uses and their significant impact. This is a serious oversight that should be corrected.

Flow Based Regimen -

I appreciate that the USFS has proposed to allow some boating on two of the three

sections under some conditions. Unfortunately, this has the appearance of nothing more than a token to try to appease boaters and maybe the USFS Chief. The restrictions are extreme and represent an unfair burden to both boaters and the USFS. For example, it appears that the USFS purports to be able to predict, in advance, the mean daily flow. An honest and genuine effort at this would surely be quite difficult and would result in significant error. Further, I suspect that, given the USFS's long term recalcitrance regarding paddling on these sections that any error would be against boating. A mean daily value can only be calculated accurately after the fact. And then, it is too late to boat. Does the USFS propose to tell us after the day is over that the mean daily flow was adequate? While MDF may be easier to codify, it is not easier to enforce. A more fair method would be to allow boating when the peak on a day was above a certain threshold. I would suggest that we use 2.2 feet on the 76 gauge. Of course, that is way downstream of the Upper Chattooga, and would give both false positives and false negatives. But, it is easily enforced, and is open and transparent in that everyone interested can see it on the Internet as well as in official USGS records after the fact.

Commercial Rafting

Commercial rafting should never be allowed on any of these sections as it would damage the solitude of the area. In fact, all commercial exploitation of the area should be banned. This should include whitewater guided trips as well as fly-fishing guides and trips.

Portage -

Alternative 4 – Direct and Indirect Effects mentions "implementing designated portage trails". I don't understand why the USFS keeps bringing this up. No portage trails are required and they need not be considered. As I mentioned, I was on the "Expert Panel" trial runs. All portages were made on bedrock except for the large logjam on the Chattooga Cliffs reach, which was portaged on the logs. This is supported by the Berger Group Phase 1 Assessment Report.

Visitation Impact –

Page 53 of the draft states "Alternatives that attract more users to the remote upper stretches of the river increase the likelihood of portage needs and trampling of vegetation," I already exposed the portage issue as bogus. Additionally, visitation will increase regardless of the status of boating. The USFS need to implement systems that will measure and control this increase by requiring registration. The wording of this statement reveals something of the intent of the USFS. It implies that the USFS is only interested in restricting one user group instead of protecting the resource itself from all threats. Furthermore, continued stocking would qualify

as something that “attracts more users” and increases the likelihood of trampling of vegetation.

Non-Native Species –
Why is there no analysis, in this or any other document, of the impact of stocking non-native species adjacent to a Wilderness area? Why is it OK to create an attraction by artificially altering the fauna and bringing in more visitors, instead of allowing the enjoyment of the resource in its natural state?

Adaptive Management -
Page 125 of the EA mentions an “adaptive management” component that can determine the need for additional use restrictions. So, why not be more permissive at first and then more restrictive later? It mystifies me that the USFS proposes to manage under this doctrine with no clear knowledge of the number of (non-boater) users and no permit process.

Conflict –
On page 105 of the draft is the following passage: “If the Forest Service chooses to continue current management the boaters’ antipathy toward those who oppose boating would likely escalate. Goal interference and the resulting face to-face conflict under this alternative is the same as the Existing Condition.” As a boater, I find this immensely insulting. As far as I know, there is no evidence of boaters causing conflict. The only threat of conflict that has come out in any of the meetings appears to have come from local anglers. So, why would the USFS point the finger at paddlers? I challenge the USFS to provide evidence that conflicts are initiated by paddlers.

<u>Reach Specific Comments:</u>
Chattooga Cliffs Section – I agree and support the proposed limits on number of parties and paddlers on this section. I would even support a lower number of parties. It is a fragile place and too much traffic will damage it. I support the banning of rafts from this section. It is far too small to allow safe passage of a raft. Also, rafts would necessarily cause more damage to the area than smaller craft. I support the idea of a river flow based system, however, as mentioned above, the prediction of a Daily Mean Flow is inappropriate. A simple threshold on the stage gauge at Burrells Ford or 76 would be much more manageable. I am disappointed at the unfairly short calendar season and request that the USFS reconsider. A more appropriate season would be December 1 through May 31. That would allow viewing of the rhododendron and other Spring changes on the rare days that there is enough water to float the river.

Ellicott Rock Section – While rafts have safely traveled this section, I support a ban on rafts here also for the same reasons mentioned above. The proposed limits on parties and trips are appropriate for this section, but for different reasons than Chattooga Cliffs. The number of trips could be increased with little impact. This area is far less fragile than Chattooga Cliffs. Rather than protecting a fragile ecosystem, the limits would serve to preserve solitude. The season should be changed to extend from December 1 to May 31. The flow based system should be changed as previously mentioned. In addition, the USFS should require the cessation of stocking of non-native fish adjacent to the Wilderness area. That ban should extend as far downstream as Burrells Ford Bridge.

Rock Gorge Section – I can only assume that the USFS has excluded paddling on this section as a complete submission to the requests from the angling lobby. As proven in the boating trial study, as well as 30 years of unauthorized trips, this is a long, challenging, but relatively safe section of whitewater that is appropriate for paddlers seeking solitude. It is unfair that this stretch of water should be reserved for anglers wading at lower than boatable flows, hunting prey that is not native to this river and is placed there for their amusement. Fundamentally, there is a difference between enjoying a resource in its natural state for what it is (hiking, camping, animal watching, paddling), and modifying a resource by altering the riverbed and stocking it with non-native fauna. This section should be managed to allow paddling under the same rules as the upper sections. And the season should be December 1 through May 31 to allow viewing from the river of the immense hillsides of rhododendron & mountain laurel in full bloom.

Summary

This has been a long and arduous process. The preferred alternative, as written, is still very disappointing, in fact wrong headed. It appears that the USFS has still not treated this process in a fair and proper manner. There is still a chance for the USFS to make small alterations that would make it much more fair. Please consider the points I've made and adjust Alternative 4.

Thanks

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