From: Michelle Burnett
To: comments-southern-francismarion-sumter@FSNOTES
Subject: Fw: Chattooga comment letter - Friends of Upper Chattooga
Date: 07/31/2008 11:19 AM

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Michelle Burnett
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----- Forwarded by Michelle Burnett/R8/USDAFS on 07/31/2008 11:19 AM -----

Jeanne LeBoeuf/R8/USDAFS

07/31/2008 11:08 AM

To: Tony L White/R8/USDAFS@FSNOTES, Michelle Burnett/R8/USDAFS@FSNOTES, Mike Crane/R8/USDAFS@FSNOTES

cc:

Subject: Fw: Chattooga comment letter - Friends of Upper Chattooga

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Jeanne S. LeBoeuf
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Francis Marion & Sumter NFs in SC
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----- Forwarded by Jeanne LeBoeuf/R8/USDAFS on 07/31/2008 11:07 AM -----

Joseph Gatins <jgatins@alltel.net>

07/30/2008 12:54 PM

To jthomas01@fs.fed.us, gbain@fs.fed.us, mhilliard@fs.fed.us, clmyers@fs.fed.us

cc

Subject Fwd: Chattooga comment letter - Friends of Upper Chattooga

Jerome, Georgel, Marisue and Chuck: FOR YOU INFORMATION, Friends of the Upper Chattooga filed the following this date and will mail a signed, hard copy tomorrow.
Joe Gatins
Spokesman, Friends of the Upper Chattooga
706-782-9944

Begin forwarded message:

From: Joseph Gatins <jgatins@alltel.net>
Date: July 30, 2008 12:51:24 PM EDT
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga comment letter - Friends of Upper Chattooga

Friends of the Upper Chattooga

2489 Glade Road

Clayton, Georgia 30525

706-782-9944

July 30, 2008

Via E-Mail and U.S. Mail

USDA Forest Service

Francis Marion & Sumter National Forests

ATTN: Chattooga Planning Team

4391 Broad River Road

Columbia, South Carolina 29212

comments-southern-francismarion-sumter@fs.fed.us

Re: Proposal for managing recreation uses on the Upper Chattooga River

Dear Sir or Madam:

Thank you for seeking public comment on the U.S. Forest Service's proposal for management of recreation uses on the Upper Chattooga River. We commend the Forest Service for giving the management

of this special place that is part of the Congressionally-designated Wild and Scenic Chattooga River and Ellicott Rock Wilderness the careful consideration it is due. Friends of the Upper Chattooga, on its own behalf and on behalf of each of its members, submits this letter in response to the Forest Service's request for comments on the pre-decisional/draft Environmental Assessment (Draft EA) for the Management of Recreational Uses on the Upper Chattooga River released on July 2, 2008.

Friends of the Upper Chattooga is a diverse coalition of conservation- and recreation-minded organizations, including state councils of Trout Unlimited; state Wildlife Federations; Georgia ForestWatch; Whiteside Cove Association; the Jackson-Macon Conservation Alliance; and Wilderness Watch. As you know, members of Friends of the Upper Chattooga have closely followed the Forest Service study and analysis of this resource and participated in every opportunity for public comment offered by the agency. This we shall continue to do in efforts to help protect the Chattooga's wild and scenic values, to educate the public to threats to these values, and to assist the Forest Service in arriving at a reasonable decision that, above all, protects this river's resources. The stretch of river at issue is a haven for hikers, hunters, naturalists, bird watchers, swimmers and trout fishermen. It includes the Chattooga Cliffs, Ellicott Rock Wilderness and Rock Gorge, among the few remaining wild places in the tri-state area that still provide high-quality solitude and wilderness experience. We want to help the Forest Service do what is best for the long-term future of the Upper Chattooga.

Friends of the Upper Chattooga, individually and collectively, and the individual signatories below would have preferred that the Forest Service adhere to and continue the current zoning for the entire 57-mile Wild and Scenic Chattooga River, which prohibits boating on any part of the headwaters above Route 28. Zoning is an appropriate management tool for the Forest Service to utilize for the Upper Chattooga, and continuing the zoning–which wisely takes into account the recreation uses on the lower part of the river as it has

been for the past 30-plus years--is part of our preferred management direction.

We agree with the Forest Service that action is needed to support the outstanding remarkable values (ORVs) of the Upper Chattooga, and we thank the agency for proposing steps to safeguard ORVs in light of the expected increase in recreation use of the resource over the next few years. To assist the agency with its ultimate decision regarding management of recreation uses on the Upper Chattooga, we provide the following comments for your consideration. Individual members of the Friends of the Upper Chattooga also will separately submit additional comments addressing the agency's preferred alternative.

Scope of Assessment: The best approach would have been for the Forest Service to have conducted a recreation study of the entire Wild and Scenic River portion of the Chattooga River, which would have shown that current policy provides a diverse blend of recreational activities in numerous settings. The Forest Service's decision on American Whitewater's 2004 appeal directed the Sumter Forest Service to consider ***"the diversity of river recreation opportunities available within the geographic region."*** The Draft EA's Recreational Review (section 3.3-1) remains focused on the Upper Chattooga and continues to narrowly define social impacts within the headwaters only. Zoning boating to the majority of the River (the portion below Highway 28 and the West Fork watershed) remains the best option for protecting the environment and enhancing the remarkable recreation opportunities available in the Upper Chattooga.

Implementation Resources: Regardless of the management alternative finally selected, it is critical for the agency to provide the resources necessary to implement the final management policy to prevent adverse impacts to the ORVs. To the extent boating may be permitted, the Friends urge that access to boating be made contingent on the boating community's compliance with restrictions

and that penalties for unauthorized use have sufficient deterrent value.

Management uniformity: The Friends strongly urge the agency to adopt uniform standards for all three forests regarding policy enforcement and large woody debris ("LWD") management. The removal of any LWD should be based on the "primary emphasis" standards found within section 10 of the Wild and Scenic Rivers Act.

New Access points: The impact from use, parking needs and designation of County Line Road or the spur trail off the Chattooga River Trail requires an explanation.

Wilderness character: The final decision must protect the area's wilderness character, including outstanding opportunities for solitude, natural conditions, unhindered natural processes, and lack of human-built structures and installations.

Other Users: The agency's final decision should ensure the safety of swimmers in the Upper Chattooga and should insure that the desired conditions from all users collected in 2005 during the LAC be incorporated into the final EA.

Biological resources: The agency's final decision should protect the biological resources of the Upper Chattooga, including vegetation and wildlife habitat on the main stem and tributaries. We ask that the agency carefully review the impact additional boating will have on birds nesting in the riparian zones.

Please do not hesitate to contact us if there are questions, or if you would like to discuss the points above in person.

Sincerely yours,

Michael Squeak Smith

Morganton, North Carolina

Board of Trustees, Trout Unlimited

By JG, with express permission

Joseph Gatins

Satolah, Georgia

Co-District Leader

Georgia ForestWatch

Doug Adams

Rabun Gap, Georgia

Newsletter Editor, Rabun Chapter, Trout Unlimited

By JG, with express permission

Charlie Breithaupt

Clayton, Georgia

Chairman, Georgia Council of Trout Unlimited

By JG, with express permission

Tom McInnis

Past Chairman, South Carolina Council of Trout Unlimited

Clemson, South Carolina

By JG, with express permission

Art Shick

West Union, South Carolina

South Carolina TU National Leadership Council Representative

David Bates

Highlands, North Carolina

Executive Director, Jackson-Macon Conservation Alliance

By JG, with express permission

Wyatt Stevens and Mike Bamford

Asheville and Cashiers, North Carolina

for the Whiteside Cove Association

By JG, with express permission

George Nickas

Missoula, Montana

Executive Director, Wilderness Watch

By JG, with express permission

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John Benbow,

Concord, North Carolina

Immediate Past President, North Carolina Wildlife Federation

By JG, with express permission

_____

David Van Lear

Pendleton, South Carolina

For the South Carolina Wildlife Federation

By JG, with express permission

Butch Clay

Mountain Rest, South Carolina

Teacher/Naturalist, Cherokee Creek Boys School

By JG, with express permission

Edwin Dale

Athens, Georgia

Former outdoor recreation planner and LAC Consultant

Chattahoochee National Forest, 1990-2002

By JG, with express permission

cc: Dr. Jerome Thomas, Supervisor, Francis Marion & Sumter National Forests

Marisue Hilliard, Supervisor, Nantahala-Pisgah National Forest

George Bain, Supervisor, Chattahoochee-Oconee National Forests

Charles L. Myers, Associate Deputy Chief, USDA Forest Service

Various other Forest Service officials interested in this issue