From: Edwin Dale
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Re: Comments on Pre-decisional EA
Date: 08/08/2008 11:59 AM

Hope this does it! Edwin

Comments and Thoughts on Pre-decisional EA

I have reviewed the Pre-decisional EA released by the Sumter NF Planning Team written to address the proposal to allow recreational boaters to paddle the Chattooga River upstream from the Highway 28 bridge. Following are my comments and thoughts on this document.

Chapter 1 Purpose and Need, Pages 1-4

It seems to me the Purpose of this proposal is to meet direction from the Washington Office to not accept the Sumter NF Plan Revision of 2004 (which supported the previously established Sumter NF LRMP of 1985 that also did not allow boating above the Highway 28 bridge) and, therefore the WO issued a directive for the Forest to restudy the issue. This is my opinion from reading the details of an obviously lobbyist based directed request as detailed by Gloria Manning in her Decision of Appeal following the legal action by American Whitewater.

The second and third paragraphs in Chapter 1 do not address the critical, and controversial, proposal to allow boating above the aforementioned bridge.

Perhaps it should be noted that one must also consider that the addition of another user group would, most likely lead to further degradation of the river corridor by increasing the number of visitors, more trails either user or agency created would occur, there would be more campfires (perhaps the major cause of environmental degradation) and more impacts on existing vegetation and animal life through creation of new user trails (especially around portages).

1.1 Need for the Proposed Actions

The last sentence in paragraph 3 of this section states, “Advanced whitewater paddlers and creek boaters are interested in experiencing these upper sections which contain very scenic, remote, narrow stretches of river.” So, is this a need? It's more like a wish, a dream, a want, a desire, a goal, but certainly not a need. The whitewater boater group already has (and has had for 30 years) access to the lower Chattooga River. At this point one should note the existing environmental differences between the two sections and ask, “would I want the Upper Chattooga River to look like this? “Interested in experiencing these upper sections which contain. . .” is hardly a valid reason to open up this section of “wild” river. I might be interested in experiencing instant wealth, but that does not make it a right, or even a need!

1.1.1

Does this mean an LRMP revision must be done on all three Forests?

Obviously existing impacts are already occurring from existing user groups. Is adding an additional user group(s) going to solve this problem?

1.1.2

1 Yes they will, and these will not be reduced by adding more users.

2 Yes they can, and will.

3 Yes, by appropriate management direction. Adding more people will diminish this value.

4 Yes. That's the purpose of this EA in following WO mandated direction for the VUCA.

5 Yes. The purpose of Step 9 in LAC planning, as well as technocratic planning.

1.2 Proposed Actions

Good proposed actions base.

1.3 Decisions to be Made

Good questions.

Chapter 2 Alternatives, Pages 5-20

Good description of Alternatives.

Alternative 2 appears, to me, to be the only progressive management Alternative. It supports the concepts of environmental restoration in a Wild and Scenic River corridor and a designated Wilderness rather than increasing visitor use and further degradation of natural values in the ecosystem.

Chapter 3 Affected Environment, Pages 21-131

Includes address of Biological, Social and Physical (also includes heritage) issues. Good reviews by wildlife biologist, social scientists and archeologists. Good descriptions of Social Resources and potential conflicts. The major problems, in my opinion, are going to be social encounters followed by further environmental degradation with the advent of increased users.

Page 27 If these effects are already present, why increase them?

Page 30 Why is this data described?

Finally, where is the address and analysis of the Economic issues? Analysis of Economics is a direction in the NEPA of 1969 and the CEQ Regulations (1974) based on NEPA Why is it not included here? If I missed this analysis because it was buried in so much other supporting data, I apologize.

Appendices Pages 132-155

These pages containing text, tabular and graphic portrayal, addressing of other issues, e.g. rescue are well written and provide references. Much of this information is overwhelming. This is not being critical it merely demonstrates a great deal of effort and input by Forest Service personnel. Many of these Forest Service personnel should be commended for their efforts in addressing an obviously lobbyist/single interest organization such as American Whitewater and their attempt to "force" a federal agency to bend its rules because a small group of citizens want . . ."to experience these upper sections which contain. . . " Awesome," as those petitioners would say.

References and Personnel are appropriate and gracious, respectively.

Overall, a good report (by the specialists) except for the shortcomings of an Economic analysis for the Alternatives and a weak (imho) Purpose and Need for overturning local LRMP decisions.

Summary

I find it extremely difficult to make the required leap of faith from these analyses to a conclusion that Alternative 4 is the preferred alternative for management. Where in the data is the suggestion that such a link is unequivocal and true? Where is the overwhelming support (other than the paddling community) to change the settled management of the Sumter NF LRMP in one (more) attempt to increase a specific vested interest user groups into a relatively primitive natural area? It appears logical to me that in this era where rampant development dominates all other interests it would be prudent to recognize these small areas with outstanding ORVs and provide additional protection for such spaces.

Further, one should be cognizant of the point, "give an inch, take a mile", and wonder when the next attempt to expand boating in this area, as well as other rivers in the United States where they are currently banned One needs only to look at environmental conditions on the lower Chattooga River with 30 years of recreational use (primarily boating as the anglers and others seeking scenery and solitude have moved on) and compare it with the upper Chattooga River with 30 years of closure to boating. Both groups of recreationists (boaters and land lovers) have survived these limitations. Why change it now for such an insignificant reason?

The three areas where I think this analysis is either weak in its arguments, or that the Agency is struggling to make a case that is obviously going to be environmentally destructive are:

The Purpose and Need are evasive and not truthful (they do not address the reality of why this analysis was initiated) and they lack substance. This is especially true for the Need section.

There is no Economic Analysis of the Alternatives. It is difficult to believe the Agency will be able to provide funding for the additional Law Enforcement personnel needed to police the behaviors of the additional user group. The opportunity to "poach" the section of upper river from Burrell's Ford to the Highway 28 Bridge will be very tempting to some.

Thirdly, one needs only to compare the riverine environment below the Highway 28 Bridge where paddling is allowed and the river environment above the Highway 28 Bridge and ask oneself, "do I really want the upper river to become like that two-thirds of the Chattooga River south of the bridge?" Is that appropriate land and river management? Is satisfying a single interest group who wants "to experience these upper sections which contain. . . " really all that important that management of A Wild and Scenic River and management of a designated Wilderness may be affected negatively through a decision to allow another visitor group on the upper river, particularly with so many other available rivers in the southeastern United States?

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On Aug 8, 2008, at 10:13 AM, comments-southern-francismarion-sumter@fs.fed.us wrote:

Mr. Dale:

Thank you for your comment on the Pre-decisional EA. Unfortunately, I cannot open your document. Would it be possible for you to send it to us as an MSWord document or a .pdf so that we can open the file?

Thank you.

Michelle Burnett

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| | Edwin Dale |

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| To: comments-southern-francismarion-sumter@fs.fed.us |
| cc: |
| Subject: Comments on Pre-decisional EA |

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(See attached file: Comments on Pre-decisional EA.odt)

Attached, please find subject.

Thank you,

Edwin Dale
<Comments on Pre-decisional EA.odt>

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