



PlumberManX@aol.com

09/25/2007 10:08 AM

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

cc:

Subject: Chattooga boating ban.

Mr or Mrs ?

My name is Darren Pruett.I live in salisbury NC.I would like a chance to make my voice heard on the ban on the upper Chattooga.I think its very silly to continue with this ban.Everybody knows that boaters are only going to be on this run when its high,not good fishing conditions.Also I dont think its fair or legal to tell on group of tax payers that they can't use the river when another can.It would be different if we were destroying the river bed or its banks.Its not like we are asking to cut trails so we can ride atv's or something like that.If I knew it would hurt the river I would be against it myself.Last but not least there are not many boaters that will be making that run anyhow,its not going to be another Nantahala.I would be against that myself.Make the right call let private boaters on the Chattoga. Darren Pruett

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"Mike"
<mbamford123@comcast.net>

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject:

09/26/2007 11:44 AM
Please respond to mike



safety.pdf

PUBLIC SAFETY FOR THE CHATTOOGA WILD & SCENIC RIVER

We urge the Forest Service to consider public safety in determining whether to change the current zoned use management plan for the Chattooga River. There have been thirty-nine fatalities on the Chattooga River since 1970. Twenty-four are attributed to whitewater boating.¹ Boaters recently labeled section 00 of the Chattooga as “the most difficult section of the entire river.”² If opened, the headwaters can logically be expected to have more accidents and deaths from whitewater boating and the associated spectators.

Nevertheless, American Whitewater has argued that none of the reported deaths happened on the upper Chattooga and so the upper Chattooga River (section 00) should be opened to boating.³ This argument is absurd. The United States Forest Service properly restricted boating in the original Wild and Scenic River management plan to less treacherous sections of the river below Route 28. On the upper Chattooga, it is no coincidence that no boats produce no accidents. If anything, this safety record proves that the Forest Service’s zoning of boating to the river below Highway 28 is working by consolidating the concentration of safety .

The Appeal Decision states that “there is no basis in law, regulation or policy to exclude a type of wilderness-conforming recreation use due to concerns relative to safety.”⁴ However, the Forest Service has not excluded boating from the Chattooga River - rather, it allows boating on the majority of the river. So also, the Forest Service is required to consider public safety in its water use decisions. Thus, the Forest Service must “**regulate on-water use including providing a level of public safety, maintaining a desired recreating experience, and protecting biological and physical values.**”⁵ Additionally, in determining capacity and establishing a management plan, the Forest Service must consider “**the quality of [the non-boater’s] recreation experience, and public health and safety.**”⁶ Accordingly, the Appeal Decision language does not mean that the Forest Service cannot consider the potential danger to persons involved in an activity and those that could be hurt by that activity, both directly and as a result of search and rescue operations. This is not only good law, it is simple common sense. Since search and rescue teams are operating actively in our society, at real cost to themselves and their altruistic supporters, they must have a voice in this issue.

Protecting visitors by restraining more extreme activities, out of safety considerations, is not novel to the Chattooga. Mountain bikes are zoned from land-based trails for the safety of hikers, and hunters are regulated on Wild and Scenic Rivers for the safety of the public.⁷ Obviously, it does not take an actual accident or death for the Forest Service to determine that zoning hunting away from active campgrounds or high use areas is sound, lawful policy.

Opening the entire river to boating will likely result in lawsuits and may result in a public outcry to shut down the entire upper Chattooga (similar to what happened to the local Bridal Veil Falls or what almost happened to the lower Chattooga in 1999). An activity that is considered hazardous⁸ on the upper Chattooga River needs evaluation, not only for the floaters, but for the visitors’ safety and the safety and resources of the local volunteer search and rescue teams.

Also needing serious consideration is the environmental degradation resulting, necessarily, from the search and rescue teams’ efforts to reach and recover the foolhardy folk in need of their services.

In our highly litigious society, it would be prudent for the United States Forest Service to continue the Wild and Scenic River management guidelines and consider the safety of all visitors, including swimmers, inexperienced paddlers, and wading fishermen, when considering alterations to the current management plan.

¹ Sumter USFS published statistics, <http://www.fs.fed.us/r8/fms/>.

² p. 85, “*North Carolina Rivers & Creeks*,” Leland Davis, 2006, Brushy Mt. Publishing Inc.. co-authored by American Whitewaters’ Kevin Colburn.

³ AW Notice of Appeal, April 2004.

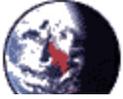
⁴ *Decision for Appeal #04-13-00-0026*, Sumter RLMP, Manning, 4/28/05.

⁵ “*Managing Designated Wild & Scenic Rivers*” pg. 37, Section 13(g).

⁶ *Wild and Scenic Rivers Guidelines* Federal Register / Vol. 47, No. 173 / Sept. 7, 1982.

⁷ “*Managing Designated Wild & Scenic Rivers*” pg. 37, Section 13(g)

⁸ Page 3008 Senate Report 93-738, also *1976 Chattooga WSR Management Plan*. also reference page 73 of the 1971 Chattooga WSR Study Report



"VanCola"
<vancola@verizon.net>
09/26/2007 12:16 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Fw: Chattooga

I did not see my letter on the <http://www.fs.fed.us/r8/fms/forest/projects/documents/836-900.pdf>, so thought I'd send it again.

----- Original Message -----

From: [VanCola](mailto:vancola@verizon.net)
To: comments-southern-francismarion-sumter@fs.fed.us
Sent: Friday, September 07, 2007 12:17 PM
Subject: Chattooga

IN response to the questions:

1. *Should there be new standards limiting trailheads, trails and/or campsites?* Yes, the current management has lead to unacceptable impacts. In addition, the USFS should monitor use by **all users** through a self-registration permitting system.
2. *Should there be new standards limiting group sizes, encounters between user groups and/or access?* Every river corridor has a certain capacity. If/when the USFS can demonstrate that the upper Chattooga's capacity is met, **all users' access** (not just boaters) should be limited consistent with sustainability of the resource.
3. *Should there be new boating opportunities on the Chattooga River?* This question is erroneous in and of itself: First, boating is not a new opportunity – it is an old one with a rich history prior to the USFS ban. In fact, the USFS was not even able to determine why boating was prohibited in the first place, much less any reasonable justification for doing so. *Should the Forest Service RESTORE boating access on the upper Chattooga?* Absolutely! Boating should be allowed on the Upper Chattooga River to the same extent that hiking, angling, swimming and other wilderness compliant activities are is allowed.
4. *Should there be new standards limiting group sizes, encounters between user groups and/or access if new boating opportunities are allowed?* Restoration of boating access has nothing to do with this underlying question. This question is no different than #2 above, and the answer is no different either. Every river corridor has a certain capacity. **If/when the USFS can demonstrate that the upper Chattooga's capacity is met, all users' access (not just boaters) should be limited consistent with sustainability of the resource.**

Further, I feel compelled to comment on a few statements that I read - bear in mind that all of the paddlers I know are very conscientious and concerned about litter ("leave no trace"). I belong to several clubs, so that's hundreds of paddlers of all types.

"If you let boaters on the River above Hwy. 28 then the next step will be the ATV companies will sue to get ATV's on hiking trails."

This is ridiculous - ATVs are like jet skis: both are motorized, noisy, and frequently operated by untrained and irresponsible operators who enjoy buzzing around. They share nothing in common with paddlers; most of us dread seeing either. Paddlers are more akin to backcountry hikers. Although they often travel in groups for safety (only prudent in any water activity), they are highly trained in outdoor safety, skilled, and pick up after themselves (and often others - we have many river clean-up days organized by paddlers).

"If boating is permitted I could certainly envision many of the swimmers being involved in accidents where the kayakers drop into a pool full of children with inner-tubes."

I regularly paddle on rivers where there are inner tubes and have never had any issue, nor have I seen any problems -- other than a few rescues performed by the kayakers where the inner-tubers got into dangerous places they should not have been because they lack control over their inner-tubes and/or didn't recognize the danger.

"Boaters...could take large loads on their boats to potentially spread trash and human impact to areas far removed from the current public access points."

Ridiculous - why would anyone want to carry a bunch of trash in their kayak? There are surely better places to dispose of trash and better things to do with one's time. Again, the paddlers I know are concerned about environmental impact and "leave no trace" that they have been somewhere. They live by the credo "pack it in, pack it out." They frequently bring trash left behind by others to their homes, as well as bring their own refuse home. Also, a number of "river clean-up" volunteer days are held by various paddling clubs.

We frequently have to clean up after anglers, who leave hooks and lines lying about -- often posing a hazard -- as well packaging from hooks, bait and lures and other trash. Lines left behind or tangled in trees can be very dangerous to all users. I have on occasion seen commercial RAFTERS leave things behind -- but the rafting companies must be responsible for their patrons and teach them to clean up after themselves. These people tend to be infrequent users of the wilderness and need to be educated. Occasionally, those who enjoyed their rafting experience take up paddlesports and become frequent and responsible users of the wilderness.

"Like the pervasive motorized vehicles, the easier access resulting from kayaking again threatens the pursuits of backcountry enthusiast and the wilderness itself. Creek boating is considered an intrusive activity for the backcountry angler, wildlife viewer or hiker; Encounters would result in a diminished wilderness experience for these other visitors. Like mountain biking on land trails, it is time the USFS acknowledges and correctly classifies the differences between creekers and other river users."

This statement contains a number of inconsistencies as well as erroneous statements:

*Kayaks are simply not motorized vehicles and have nothing in common with them! Speed boats, jet skis and the like are motorized.

*Kayakers ARE backcountry enthusiasts!

*Wildlife viewers would prefer to see no one -- especially anglers! They believe in taking pictures, not harming the wildlife.

*Creek boats do not leave any trail behind, nor do they damage the wilderness, unlike mountain bikes, which do impact the terrain.

*A lot of kayakers are also hikers, as am I. The interests of hikers and kayakers are more closely aligned than probably any other users. I've never seen any kind of conflict between the two groups; we usually have rather pleasant conversations. They are two different ways of going through the wilderness and enjoying the serenity. Today I can take my kayak, tomorrow my hiking shoes. On neither day do I litter.

I cherish and respect my right to paddle through Wilderness Areas and on Wild and Scenic Rivers.

Susan D. VanCola, CPA, ESQ



**"Kim and Hennen
Cummings"**
<henandkim@earthlink.
net>

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: "Please keep Boats off the Chattooga North Fork."

09/28/2007 01:09 AM

"Please keep Boats off the Chattooga North Fork."

Thank you!



"Cummings, Dr.
Hennen"
<HCUMMINGS@tarleton.edu>

09/28/2007 09:34 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Please keep Boats off the Chattooga North Fork

Hennen Cummings, Ph.D.

Assistant Professor and Director of Turfgrass Management
Tarleton State University
Box T-0050

201 Saint Felix St.
Stephenville, TX 76402

(254) 968-9223 Work

(254) 968-9228 Fax

hcummings@tarleton.edu

Much obliged



Pat Hopton
<scotts_creek58@yahoo.com>

09/30/2007 06:25 PM

To: comments-southern-francismarion-sumter@fs.fed.us
cc:
Subject: Hopton Comments 9/30/07

September 30, 2007

Mr Cleeves,

Please accept these comments on alternatives for managing recreation uses on the upper Chattooga River. These comments are a result of the new, revised 9 alternatives formulated after the initial scoping period. The ID Team stated during the public involvement meeting on Sept 29 that additional comments would be accepted until Oct 1. Therefore these comments I am submitting now are timely and should be included in the public record.

I understand that after formulating 6 alternatives and giving the public 30 days to provide comments, that the ID Team revised 5 of the six and added 3 new alternatives using issues and concerns gleaned from over 1200 comments received. These new 9 alternatives now provide a new set of issues and concerns that were not present in the original 6 alternatives. For example, the new alternatives include boating restrictions using time-of-day (Alternative 4) or time-of-year (Alternatives 7 and 9) that were not present in the original six. I am very disappointed that only a small number of people (approximately 100 in attendance on Sept 29) that did not fully or fairly represent the diverse interests in the upper Chattooga River were given confusing instructions and a very short amount of time to provide comments on their issues and concerns for these 9 new alternatives. ***I respectfully request that a 30 day public comment period be given on the 9 alternatives for managing recreation uses on the upper Chattooga River.***

It is clear that all interest groups and the Forest Service wish to find a fair compromise in the management of recreation uses on the Chattooga River; one that will allow recreational boating and provide opportunities for solitude and high quality fishing. Unfortunately, some recreational uses are not compatible, such as boating and those seeking solitude or high quality fishing. I submit that a fair compromise has already been found: the "zoning" concept that was formulated over 30 years ago in the original Chattooga Wild and Scenic River Plan has successfully separated conflicting recreational uses by allowing boating on the lower 36 miles of the Chattooga River downstream from Highway 28 including the West Fork, and with the recreation users seeking solitude and high quality fishing using the upper 21 miles of the Chattooga River upstream from Highway 28. "Zoning" of user groups is a fair, common, ethical and legal land management practice that successfully avoids conflicts between non-compatible recreational user groups. ***For this reason, Alternative 3 should be the Preferred Alternative.***

Attached below are my specific issues and concerns regarding each of the 9 new alternatives for managing recreation uses on the upper Chattooga River. The tables with bullet statements below correspond to the tables and bullets found in the September 27, 2007 "Set of Revised Alternatives" letter. My concerns with specific proposed actions are marked in red.

Thank you for your consideration of these comments. Please continue to keep me on your mailing list for all further notices and actions pertaining to this proposed action.

/s/ Pat Hopton

PATRICK HOPTON

205 Scotts Creek Road
Clayton, GA 30525

scotts_creek58@yahoo.com

PAGE BREAK

1

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Woody Debris

“It is not clear what is mean t by ‘enha nce wood y debris s recru itmen t’ or ‘limit ed wood y debris s remo val’ F in the six
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[Change: all alternatives now retain the language from current management.]

Proposed Encounter Goals

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[Some alternatives allow for more encounters in some places than in others.]

Permit System

“How would a permit system be initiated and / what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

ALTERNATIVE 1	
Standard and Actions	Comments and Concerns
<i>Boating</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Group Size</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Campsites</i>	<ul style="list-style-type: none"> • Agree. No concerns.

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How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

2

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

“The enco unter goals are too low, espec ially around the bridg es and in the Dela yed Harv est area. Curre nt use level s alrea dy excee d B these enco unter goals ”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

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[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

ALTERNATIVE 2	
Standards and Actions	Comments and Concerns
<i>Boating</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Group Encounters</i>	<ul style="list-style-type: none"> • Don't agree. "Encounters" should be more clearly defined. The goal should be reducing encounters between conflicting user groups. I submit that one encounter between a boater (not a group) and a user seeking solitude and high quality fishing is a conflicting encounter. An encounter between two fishermen passing on a trail is not a conflicting encounter.
<i>Group Size</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on

	managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns.
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't Agree. This is impractical and not necessary at the Highway 28 bridge. This area receives extensive use by fisherman using the Delayed Harvest section and by hikers using the Chattooga River Trail, Bartram Trail, and Foothills Trail. Relocating the existing parking areas to outside the Corridor would force fisherman and hikers to walk on the shoulder of Highway 28 in order to access the river. This action would create a safety hazard to fisherman and hikers, having an adverse social impact on the visitor experience. • Don't agree. A lack of parking will not prevent a user from using the area and will create law enforcement issues where none previously existed. • Don't agree. See above. Lost parking should be replaced with sustainable, secure, and environmentally sensitive parking areas.
<i>User Registration</i>	<ul style="list-style-type: none"> • Agree. No concerns.

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How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

<p>“The encounter goals</p>

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[Some alternatives allow for more encounters in some places than in others.]

Permit System

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[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

ALTERNATIVE 3	
Standards and Actions	Comments and Concerns
<i>Boating</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Group Size</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for increased parking in the Delayed Harvest section.

Alternative 3 should be the Preferred Alternative.

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How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

“The enco unter goals are too low, espec ially aroun d the bridg es and in the Dela yed Harv est area. Curre nt use level s alrea dy Nexcee /d A these enco unter goals .”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

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[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

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Group sizes should be the same for all

users

Boating solo would be unsafe during these remote, high-water conditions.

The Chatteroga Cliffs area should be more protected from the potential impacts associated

F ng.	with boati
A users	Prop osed boati ng shoul d also be limit ed to speci fic seaso ns and/o r to a speci fic time of day to furth er reduc e the poten tial for confl icts with other
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	With so little flow data avail able

in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered

F.

The boating alternatives should go further to reduce

e the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.

F ed.

The tributaries should not be considered for boating where boating is being

A prop osed.

Your Missing Issue

ALTERNATIVE 4	
Standards and Actions	Comments and Concerns
<p><i>Boating from below Private Property to Bull Pen Bridge (does not include tributaries).</i></p>	<ul style="list-style-type: none"> • Agree. No concerns. • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which may occur between 1000 and 1700. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<p><i>Boating from Bull Pen Bridge to ¼ Mile Above Burrells Ford Bridge (does not include tributaries).</i></p>	<ul style="list-style-type: none"> • Don't agree. Inflatable kayaks are able to navigate at much lower water flow levels than the other boats, potentially causing more impacts between conflicting users. • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which may occur between 1000 and 1700 or between December 1 and March 31 or above 2.4 CFS at Hwy 76 gauge. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Group size is meaningless when considering boaters. One group of six individual boaters may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of

	<p>all backcountry river users and having a negative impact on the catch rate for fishermen.</p> <ul style="list-style-type: none"> • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<i>Group Size</i>	<ul style="list-style-type: none"> • Don't agree. Group size is meaningless when considering boaters. One group of six individual boaters may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area. There is not sufficient parking on the Whitesides Cove Road or at Bull Pen bridge to accommodate additional visitor use, including boating. Any improvements to the parking areas would have an adverse biological impact on the soils, water quality, flora, and fauna in the Ellicott Rock Wilderness Area.
<i>User Registration</i>	<ul style="list-style-type: none"> • Agree. No concerns.

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How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

“The enco unter goals are too low, espec ially aroun d the bridg es and in the Dela yed Harv est area. Curre nt use level s alrea dy excee d these enco unter goals .”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

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[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

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The Chatteroga Cliffs area should be more protected from the potential impacts associated

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B.

The boating alternatives should go further to reduce

e the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.

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The tributaries should not be considered for boating where boating is being

A proposed.

Your Missing Issue

ALTERNATIVE 5	
Standards and Actions	Comments and Concerns
Boating from below private land to Lick Log (does not include tributaries)	<ul style="list-style-type: none"> • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which may occur above 2.3 CFS at Hwy 76 gauge. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Inflatable kayaks are able to navigate at much lower water flow levels than the other boats, potentially causing more impacts between conflicting users. • Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Group size is meaningless when considering boaters. One group of six individual boaters may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
Group Size	<ul style="list-style-type: none"> • Don't agree. Group size is meaningless when considering boaters. One group of six individual boaters may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.
Woody Debris	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse

	biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area. There is not sufficient parking on the Whitesides Cove Road or at Bull Pen bridge to accommodate additional visitor use, including boating. Any improvements to the parking areas would have an adverse biological impact on the soils, water quality, flora, and fauna.
<i>User Registration</i>	<ul style="list-style-type: none"> • Agree. No concerns.

PAGE BREAK

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

6

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

The encounter goals are too low, especially

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[Some alternatives allow for more encounters in some places than in others.]

Permit System

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[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

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e. A more adaptive approach needs to be considered

F.

The boating alternative should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed

F ed.

The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

ALTERNATIVE 6	
Standards and Actions	Comments and Concerns
<i>Boating between private land and Highway 28 Bridge (does not include tributaries)</i>	<ul style="list-style-type: none"> • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Inflatable kayaks are able to navigate at much lower water flow levels than the other boats, potentially causing more impacts between conflicting users. Allowing rafts will open up the river to anyone using innertubes, thus creating a safety hazard. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<i>Group Size</i>	<ul style="list-style-type: none"> • Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or

	solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area. There is not sufficient parking on the Whitesides Cove Road or at Bull Pen bridge to accommodate additional visitor use, including boating. Any improvements to the parking areas would have an adverse biological impact on the soils, water quality, flora, and fauna.
<i>User Registration</i>	<ul style="list-style-type: none"> • Agree. No concerns.

PAGE BREAK

7

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

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[Some alternatives allow for more encounters in some places than in others.]

Permit System

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system be initiated and what would it look like?"

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

Inflatable kayaks should not be permitted.

Tandem craft and rafts should be considered.

Group sizes should be the same for all users.

.
Boating solo would be unsafe during these remote, high-water conditions.

The Chattanooga Cliffs area should be more protected from the potential impacts associated with boating.

Proposed boating should also

be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users

C.

With so little flow data available in the upper river, it would be very difficult to select rigid

restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered

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The boating alternatives should go further to reduce the potential for user conflicts by being more restri

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Your Missing Issue

ALTERNATIVE 7	
Standards and Actions	Comments and Concerns
<i>Boating between</i>	•

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tributaries)*

Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which may occur between Dec 1 and March 10. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users

and having a negative impact on the catch rate for fishermen.

- Don't agree. Inflatables are able to navigate at much lower water flow levels than the other boats, potentially causing more impacts between conflicting users. Allowing rafts will open up the river to anyone using inertubes, thus

	<p>creating a safety hazard.</p> <ul style="list-style-type: none">• Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<i>Group Size</i>	<ul style="list-style-type: none">• Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will

soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilder

	<p>ness experi ence of all backc ountry river users and having a negati ve impact on the catch rate for fisher men.</p>
<p><i>Woody Debris</i></p>	<ul style="list-style-type: none">• Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the

	<p>cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.</p>
<p><i>Trails</i></p>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree.

	<p>No concerns.</p> <ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites : Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites : Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppr

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	an adverse biological impact on the soils, water quality, flora, and fauna in the Ellicott Rock Wilderness Area.
User Registration	<ul style="list-style-type: none"> • Agree. No concerns.

PAGE BREAK

8

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

<p>“The encounter goals are too low, especially</p>

around the bridges and in the Delayed Harvest area. Current use levels are already exceeded these Denco under goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

“How would a permit system be initiated and what would it look like?”

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[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

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The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.

Proposed boating should also be limited to specific seasons and/or to a speci

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Your Missing Issue

ALTERNATIVE 8	
Standards and Actions	Comments and Concerns
<i>Boating between private land and Highway 28 Bridge (does not include tributaries)</i>	<ul style="list-style-type: none"> • Don't agree. Boating adversely conflicts with other backcountry recreational

use, including those seeking high quality fishing and solitude. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.

- Don't agree. Inflatable kayaks are able to navigate at

	<p>much lower water flow levels than the other boats, potentially causing more impacts between conflicting users.</p> <ul style="list-style-type: none"> • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<p><i>Group Encounters</i></p>	<ul style="list-style-type: none"> • Don't agree. "Adaptive Management

" is too vague. Limits between group encounters should be determined and enforced. Any encounter between a boater and a user seeking solitude or high quality fishing creates a negative experience for the latter groups, creating an adverse social impact. The goal should be "No Group Encounters" between boater

	s and users seeking solitude or a high quality fishing experience.
<i>Group Size</i>	<ul style="list-style-type: none">• Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking

	<p>g high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.</p>
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Woody
Debris

- Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the

	<p>most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.</p>
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Campsites : Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites : Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No

	<p>concerns.</p> <ul style="list-style-type: none"> • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area. There is not

	<p>sufficient parking on the Whitesides Cove Road or at Bull Pen bridge to accommodate additional visitor use, including boating. Any improvements to the parking areas would have an adverse biological impact on the soils, water quality, flora, and fauna.</p>
<p><i>User Registration</i></p>	<ul style="list-style-type: none"> • Agree. No concerns.

9

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

“The enco unter goals are too low, espec ially aroun d the bridg es and in the Dela yed Harv est area. Curre nt use level s — alrea — dy — excee — d C these

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[Some alternatives allow for more encounters in some places than in others.]

Permit System

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[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

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With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach

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Your Missing Issue

ALTERNATIVE 9	
Standards and Actions	Comments and Concerns
<p><i>Boating between private land and East Fork (does not include tributaries)</i></p>	<ul style="list-style-type: none"> • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which

may occur between Dec 1 and March 31. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.

- Don't agree. Boating adversely conflicts with other backcountry recrea

tional use, including those seeking high quality fishing and solitude, which may occur between the private land and East Fork. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fisher

	<p>men.</p> <ul style="list-style-type: none"> • Agree. No concerns. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<p><i>Group Encounters</i></p>	<ul style="list-style-type: none"> • Don't agree. "Adaptive Management" is too vague. Limits between group encounters should be determined and enforced. Any

	<p>encounter between a boater and a user seeking solitude or high quality fishing creates a negative experience for the latter groups, creating an adverse social impact. The goal should be “No Group Encounters” between boaters and users seeking solitude or a high quality fishing experience.</p>
<p><i>Group Size</i></p>	<ul style="list-style-type: none"> • Don't agree. Group

	<p>size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter</p>
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	<p>six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.</p>
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<p><i>Trails</i></p>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
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Woody
Debris

- Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the

	<p>most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.</p>
<p><i>Campsites : Wilderness and Wild segments</i></p>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns.
<p><i>Campsites : Recreation and Scenic segments</i></p>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<p><i>Parking</i></p>	<ul style="list-style-type: none"> • Don't agree.

There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area. There is not sufficient parking on the Whitesides Cove Road, Burrells Ford

	<p>Bridge, or at Walhalla Fish Hatchery to accommodate additional visitor use, including boating. Any improvements to the parking areas would have an adverse biological impact on the soils, water quality, flora, and fauna.</p>
<p><i>User Registration</i></p>	<ul style="list-style-type: none"> • Agree. No concerns.

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hopton_comments_2.pdf

September 30, 2007

Mr Cleeves,

Please accept these comments on alternatives for managing recreation uses on the upper Chattooga River. These comments are a result of the new, revised 9 alternatives formulated after the initial scoping period. The ID Team stated during the public involvement meeting on Sept 29 that additional comments would be accepted until Oct 1. Therefore these comments I am submitting now are timely and should be included in the public record.

I understand that after formulating 6 alternatives and giving the public 30 days to provide comments, that the ID Team revised 5 of the six and added 3 new alternatives using issues and concerns gleaned from over 1200 comments received. These new 9 alternatives now provide a new set of issues and concerns that were not present in the original 6 alternatives. For example, the new alternatives include boating restrictions using time-of-day (Alternative 4) or time-of-year (Alternatives 7 and 9) that were not present in the original six. I am very disappointed that only a small number of people (approximately 100 in attendance on Sept 29) that did not fully or fairly represent the diverse interests in the upper Chattooga River were given confusing instructions and a very short amount of time to provide comments on their issues and concerns for these 9 new alternatives. ***I respectfully request that a 30 day public comment period be given on the 9 alternatives for managing recreation uses on the upper Chattooga River.***

It is clear that all interest groups and the Forest Service wish to find a fair compromise in the management of recreation uses on the Chattooga River; one that will allow recreational boating and provide opportunities for solitude and high quality fishing. Unfortunately, some recreational uses are not compatible, such as boating and those seeking solitude or high quality fishing. I submit that a fair compromise has already been found: the "zoning" concept that was formulated over 30 years ago in the original Chattooga Wild and Scenic River Plan has successfully separated conflicting recreational uses by allowing boating on the lower 36 miles of the Chattooga River downstream from Highway 28 including the West Fork, and with the recreation users seeking solitude and high quality fishing using the upper 21 miles of the Chattooga River upstream from Highway 28. "Zoning" of user groups is a fair, common, ethical and legal land management practice that successfully avoids conflicts between non-compatible recreational user groups. ***For this reason, Alternative 3 should be the Preferred Alternative.***

Attached below are my specific issues and concerns regarding each of the 9 new alternatives for managing recreation uses on the upper Chattooga River. The tables with bullet statements below correspond to the tables and bullets found in the September 27, 2007 "Set of Revised Alternatives" letter. My concerns with specific proposed actions are marked in red.

Thank you for your consideration of these comments. Please continue to keep me on your mailing list for all further notices and actions pertaining to this proposed action.

/s/ Pat Hopton

PATRICK HOPTON
205 Scotts Creek Road
Clayton, GA 30525

scotts_creek58@yahoo.com

1

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Woody Debris

F	“It is not clear what is meant by ‘enhance woody debris recruitment’ or ‘limited woody debris removal’ in the six alternatives.”
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[Change: all alternatives now retain the language from current management.]

Proposed Encounter Goals

N/A	“The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”
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[Some alternatives allow for more encounters in some places than in others.]

Permit System

N/A	“How would a permit system be initiated and what would it look like?”
-----	---

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

ALTERNATIVE 1	
Standard and Actions	Comments and Concerns
<i>Boating</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Group Size</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Campsites</i>	<ul style="list-style-type: none"> • Agree. No concerns.

2

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

B	“The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”
---	--

[Some alternatives allow for more encounters in some places than in others.]

Permit System

B	“How would a permit system be initiated and what would it look like?”
---	---

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

ALTERNATIVE 2	
Standards and Actions	Comments and Concerns
<i>Boating</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Group Encounters</i>	<ul style="list-style-type: none"> • Don't agree. "Encounters" should be more clearly defined. The goal should be reducing encounters between conflicting user groups. I submit that one encounter between a boater (not a group) and a user seeking solitude and high quality fishing is a conflicting encounter. An encounter between two fishermen passing on a trail is not a conflicting encounter.
<i>Group Size</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns.

<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none">• Agree. No concerns.• Agree. No concerns.• Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none">• Don't Agree. This is impractical and not necessary at the Highway 28 bridge. This area receives extensive use by fisherman using the Delayed Harvest section and by hikers using the Chattooga River Trail, Bartram Trail, and Foothills Trail. Relocating the existing parking areas to outside the Corridor would force fisherman and hikers to walk on the shoulder of Highway 28 in order to access the river. This action would create a safety hazard to fisherman and hikers, having an adverse social impact on the visitor experience.• Don't agree. A lack of parking will not prevent a user from using the area and will create law enforcement issues where none previously existed.• Don't agree. See above. Lost parking should be replaced with sustainable, secure, and environmentally sensitive parking areas.
<i>User Registration</i>	<ul style="list-style-type: none">• Agree. No concerns.

3

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

N/A	“The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”
-----	--

[Some alternatives allow for more encounters in some places than in others.]

Permit System

N/A	“How would a permit system be initiated and what would it look like?”
-----	---

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

ALTERNATIVE 3	
Standards and Actions	Comments and Concerns
<i>Boating</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Group Size</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for increased parking in the Delayed Harvest section.

Alternative 3 should be the Preferred Alternative.

4

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

N/A	“The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”
-----	--

[Some alternatives allow for more encounters in some places than in others.]

Permit System

A	“How would a permit system be initiated and what would it look like?”
---	---

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

A	Inflatable kayaks should not be permitted.
A	Tandem craft and rafts should be considered.
A	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
A	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
F	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
F	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

ALTERNATIVE 4	
Standards and Actions	Comments and Concerns
<p><i>Boating from below Private Property to Bull Pen Bridge (does not include tributaries).</i></p>	<ul style="list-style-type: none"> • Agree. No concerns. • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which may occur between 1000 and 1700. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<p><i>Boating from Bull Pen Bridge to ¼ Mile Above Burrells Ford Bridge (does not include tributaries).</i></p>	<ul style="list-style-type: none"> • Don't agree. Inflatable kayaks are able to navigate at much lower water flow levels than the other boats, potentially causing more impacts between conflicting users. • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which may occur between 1000 and 1700 or between December 1 and March 31 or above 2.4 CFS at Hwy 76 gauge. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Group size is meaningless when considering boaters. One group of six individual boaters may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<p><i>Group Size</i></p>	<ul style="list-style-type: none"> • Don't agree. Group size is meaningless when considering boaters. One group of six individual boaters may start the

	<p>day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.</p>
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area. There is not sufficient parking on the Whitesides Cove Road or at Bull Pen bridge to accommodate additional visitor use, including boating. Any improvements to the parking areas would have an adverse biological impact on the soils, water quality, flora, and fauna in the Ellicott Rock Wilderness Area.
<i>User Registration</i>	<ul style="list-style-type: none"> • Agree. No concerns.

5

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

C	“The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”
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[Some alternatives allow for more encounters in some places than in others.]

Permit System

A	“How would a permit system be initiated and what would it look like?””
---	--

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

F	Inflatable kayaks should not be permitted.
A	Tandem craft and rafts should be considered.
A	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
A	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
B	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
F	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

ALTERNATIVE 5	
Standards and Actions	Comments and Concerns
<i>Boating from below private land to Lick Log (does not include tributaries)</i>	<ul style="list-style-type: none"> • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which may occur above 2.3 CFS at Hwy 76 gauge. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Inflatable kayaks are able to navigate at much lower water flow levels than the other boats, potentially causing more impacts between conflicting users. • Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Group size is meaningless when considering boaters. One group of six individual boaters may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<i>Group Size</i>	<ul style="list-style-type: none"> • Don't agree. Group size is meaningless when considering boaters. One group of six individual boaters may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most

	<p>restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.</p>
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area. There is not sufficient parking on the Whitesides Cove Road or at Bull Pen bridge to accommodate additional visitor use, including boating. Any improvements to the parking areas would have an adverse biological impact on the soils, water quality, flora, and fauna.
<i>User Registration</i>	<ul style="list-style-type: none"> • Agree. No concerns.

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

6

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

N/A	The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals
-----	---

[Some alternatives allow for more encounters in some places than in others.]

Permit System

A	How would a permit system be initiated and what would it look like?
---	---

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

F	Inflatable kayaks should not be permitted.
A	Tandem craft and rafts should be considered.
A	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
F	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
F	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
F	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

ALTERNATIVE 6	
Standards and Actions	Comments and Concerns
<i>Boating between private land and Highway 28 Bridge (does not include tributaries)</i>	<ul style="list-style-type: none"> • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Inflatable kayaks are able to navigate at much lower water flow levels than the other boats, potentially causing more impacts between conflicting users. Allowing rafts will open up the river to anyone using innertubes, thus creating a safety hazard. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<i>Group Size</i>	<ul style="list-style-type: none"> • Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area. There is not sufficient parking on the Whitesides Cove Road or at Bull Pen bridge to accommodate additional visitor use, including boating. Any improvements to the parking areas

	would have an adverse biological impact on the soils, water quality, flora, and fauna.
<i>User Registration</i>	<ul style="list-style-type: none">• Agree. No concerns.

7

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

N/A	“The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”
-----	--

[Some alternatives allow for more encounters in some places than in others.]

Permit System

A	“How would a permit system be initiated and what would it look like?”
---	---

[Some alternatives include a permit system or possible permit system, and some do not.]

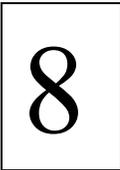
Boating Above Highway 28

F	Inflatable kayaks should not be permitted.
A	Tandem craft and rafts should be considered.
A	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
A	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
C	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
F	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
F	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

ALTERNATIVE 7	
Standards and Actions	Comments and Concerns
<i>Boating between Bull Pen and Highway 28 Bridge (does not include tributaries).</i>	<ul style="list-style-type: none"> • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which may occur between Dec 1 and March 10. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Inflatable kayaks are able to navigate at much lower water flow levels than the other boats, potentially causing more impacts between conflicting users. Allowing rafts will open up the river to anyone using innertubes, thus creating a safety hazard. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<i>Group Size</i>	<ul style="list-style-type: none"> • Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area.

	<p>There is not sufficient parking on the Whitesides Cove Road or at Bull Pen bridge to accommodate additional visitor use, including boating. Any improvements to the parking areas would have an adverse biological impact on the soils, water quality, flora, and fauna in the Ellicott Rock Wilderness Area.</p>
<p><i>User Registration</i></p>	<ul style="list-style-type: none"> • Agree. No concerns.



How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

D	“The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”
---	--

[Some alternatives allow for more encounters in some places than in others.]

Permit System

A	“How would a permit system be initiated and what would it look like?”
---	---

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

F	Inflatable kayaks should not be permitted.
C	Tandem craft and rafts should be considered.
A	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
F	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
A	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
F	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

ALTERNATIVE 8	
Standards and Actions	Comments and Concerns
<i>Boating between private land and Highway 28 Bridge (does not include tributaries).</i>	<ul style="list-style-type: none"> • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Inflatable kayaks are able to navigate at much lower water flow levels than the other boats, potentially causing more impacts between conflicting users. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<i>Group Encounters</i>	<ul style="list-style-type: none"> • Don't agree. "Adaptive Management" is too vague. Limits between group encounters should be determined and enforced. Any encounter between a boater and a user seeking solitude or high quality fishing creates a negative experience for the latter groups, creating an adverse social impact. The goal should be "No Group Encounters" between boaters and users seeking solitude or a high quality fishing experience.
<i>Group Size</i>	<ul style="list-style-type: none"> • Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns.
<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none"> • Don't agree. There is a need for parking management,

	<p>including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area. There is not sufficient parking on the Whitesides Cove Road or at Bull Pen bridge to accommodate additional visitor use, including boating. Any improvements to the parking areas would have an adverse biological impact on the soils, water quality, flora, and fauna.</p>
<p><i>User Registration</i></p>	<ul style="list-style-type: none"> • Agree. No concerns.



**How well does this alternative respond to each of the following issues?
Please assign a grade of A, B, C, D, or F, or NA (not applicable).**

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

C	“The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”
---	--

[Some alternatives allow for more encounters in some places than in others.]

Permit System

A	“How would a permit system be initiated and what would it look like?”
---	---

[Some alternatives include a permit system or possible permit system, and some do not.]

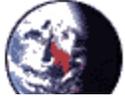
Boating Above Highway 28

A	Inflatable kayaks should not be permitted.
A	Tandem craft and rafts should be considered.
? Does not state if for all users.	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
C	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
F	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
F	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

ALTERNATIVE 9	
Standards and Actions	Comments and Concerns
<i>Boating between private land and East Fork (does not include tributaries).</i>	<ul style="list-style-type: none"> • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which may occur between Dec 1 and March 31. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Don't agree. Boating adversely conflicts with other backcountry recreational use, including those seeking high quality fishing and solitude, which may occur between the private land and East Fork. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen. • Agree. No concerns. • Don't agree. "Commercial" boating needs to be more clearly defined. It should include boat rentals, paid shuttle service, and paid guide service.
<i>Group Encounters</i>	<ul style="list-style-type: none"> • Don't agree. "Adaptive Management" is too vague. Limits between group encounters should be determined and enforced. Any encounter between a boater and a user seeking solitude or high quality fishing creates a negative experience for the latter groups, creating an adverse social impact. The goal should be "No Group Encounters" between boaters and users seeking solitude or a high quality fishing experience.
<i>Group Size</i>	<ul style="list-style-type: none"> • Don't agree. Group size is meaningless when considering boaters. One group of six boats may start the day together as a group, but will soon disperse and have some distance between them for aesthetic and safety reasons. Therefore a user seeking high quality fishing or solitude, when encountering these boaters, would then encounter six boaters, not one group. This action would have an adverse social impact by disrupting the solitude and wilderness experience of all backcountry river users and having a negative impact on the catch rate for fishermen.
<i>Trails</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns. • Agree. No concerns.
<i>Woody Debris</i>	<ul style="list-style-type: none"> • Don't agree. The watershed is located in three different National Forests with each having different guidelines on managing large woody debris, thus having an adverse biological impact on the cold water fisheries. The management of large woody debris should be consistent on the river. I propose using the most restrictive guideline; that is, the one used by the National Forests in North Carolina, for managing large woody debris in the upper Chattooga River.
<i>Campsites: Wilderness and Wild segments</i>	<ul style="list-style-type: none"> • Agree. No concerns. • Agree. No concerns.

<i>Campsites: Recreation and Scenic segments</i>	<ul style="list-style-type: none">• Agree. No concerns.• Agree. No concerns.• Agree. No concerns.
<i>Parking</i>	<ul style="list-style-type: none">• Don't agree. There is a need for parking management, including a possible increase in capacity, at the Highway 28 bridge. This action would suppress use of the Delayed Harvest section, having an adverse economic impact on the local area. There is not sufficient parking on the Whitesides Cove Road, Burrells Ford Bridge, or at Walhalla Fish Hatchery to accommodate additional visitor use, including boating. Any improvements to the parking areas would have an adverse biological impact on the soils, water quality, flora, and fauna.
<i>User Registration</i>	<ul style="list-style-type: none">• Agree. No concerns.



Pattillo
<jpattill@alltel.net>
09/30/2007 07:37 PM

To: comments-southern-francismarion-sumter@fs.fed.us
cc:
Subject: Revisions

I can't believe you are allowing only one day for users to evaluate revisions to usage plans on the Upper Chattooga! It is certainly not clear to me what is going on here. With that time restriction, and lack of clarity, I can only choose alternative one (1).

Pat Pattillo, Dahlonega Ga



"Tony Bebber"
<tbebber@earthlink.net
>

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc: <jenno@scwf.org>
Subject: New alternatives to Chattooga Management Plan

09/30/2007 09:10 PM

Dear Sir/Madam:

I have just realized (9/30 8:30 pm) that you have amended many of the proposed alternatives for the Chattooga Management Plan and added additional alternatives. You provided the information on your website on 9/27 and the deadline is 10/1. Giving 5 days (3 business days) to find and respond to this new information is a questionable practice and alludes that you really do not care for public comments.

Regardless, I am stating my concern that boating should not be allowed above Hwy 28. The proposed alternatives and new amendments do not enhance the situation significantly. The proposed boating will seriously impact the natural resources, create conflicts with existing users, and encourage the need for "rescue" of individuals and their gear/litter where the problem does not currently exist. It will also require significant enforcement measures by the Forest Service and others, which is already barely adequate due to staffing shortages and years of government cutbacks.

Thank you for providing this limited opportunity for public comment.

Sincerely,

Tony Bebber
200 Finsbury Road
Columbia, SC 29212
803-781-2897



"John Stephens"
<jdt4f@mindspring.com
>

To: comments-southern-francismarion-sumter@fs.fed.us
cc:
Subject: N Fk Chattooga R Comments

10/01/2007 12:43 AM
Please respond to jdt4f

Submitted to:

comments-southern-francismarion-sumter@fs.fed.us
by 5 p.m. on Monday October 1, 2007.

My opinion is that all these alternatives are an effort by the boating interests to confound the issue and thus get in at some level of boating on the upper river and then slowly erode the new regulations to get unlimited unrestricted access to the entire upper watershed. Now they have nine (9) alternatives and they all favor the boaters as far as I am able to discern. All these indicate to me that the current regulations are the best for the rivers ecology and survival as a natural, pristine and remote environment.

I have answered the form in an abbreviated statement to reflect my opinion for all alternatives as follows :

1

How well do these alternatives respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Woody Debris

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[Change: all alternatives now retain the language from current management.]

Proposed Encounter Goals

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[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

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Group sizes should be the same for all users.

Boating solo would be unsafe during these remote, high-water conditions.

The Chatooga Cliffs area should be more protected from the potential impacts associated

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in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be

Considered.

The boating alternatives should go further to reduce

e the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.

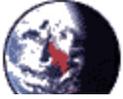
The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

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John Stephens
jdt4f@mindspring.com
EarthLink Revolves Around You.



"Terry Rivers"
<tlr1121@alltel.net>
10/01/2007 06:45 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject:



chattoogasignissues.doc

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Woody Debris

____A____ “It is not clear what is meant by ‘enhance woody debris recruitment’ or
____ “limited woody debris removal’ in the six alternatives.”

[Change: all alternatives now retain the language from current management.]

Proposed Encounter Goals

____A____ “The encounter goals are too low, especially around the bridges and in the
Delayed Harvest area. Current use levels already exceed these encounter
goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

____A____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

2

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

_____A_____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

_____A_____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

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_____A_____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

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Your Missing Issue

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Permit System

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[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

A	Inflatable kayaks should not be permitted.
F	Tandem craft and rafts should be considered.
D	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
A	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
B	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
B	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
B	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

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The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals
 _____A_____

[Some alternatives allow for more encounters in some places than in others.]

Permit System

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[Some alternatives include a permit system or possible permit system, and some do not.]

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Your Missing Issue

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Your Missing Issue

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Permit System

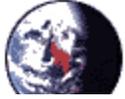
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A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue



"Larry Walker"
<amosndixie@alltel.net>
10/01/2007 10:02 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Input on Chattooga management

I do not think any of the alternatives adequately take into consideration of the future loss of hemlocks and their ecological impact.

The loss of shade from the hemlocks will create an unprecedented change in the river's ecosystem. Water temperature will likely be affected, thus affecting the macro invertebrates in, and the entire food chain associated with, the river.

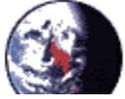
In view of this monumental change, woody debris strategies of the past and present are not adequate. A woody debris strategy that protects all in-stream woody debris is needed. Some of the hemlocks that fall into the stream will offer in-stream shade and habitat enhancement until other stream bank species replace them (and, hopefully their shade).

I think the management should specifically state that absolutely no removal of woody debris should occur. Additionally, in lieu of spending resources on "adaptive management" scenarios, available resources should be utilized to enforce the ban on removal of woody debris.

One only has to go the West Fork to see that boaters will illegally remove woody debris without regard to the aquatic ecosystem. Opening the upper sections of the main river will encourage this. I think the upper sections of the river, above Hwy 28, should not be open to any boating, and woody debris in the river should be protected.

Alternative 1 with an enhanced woody debris protection component is best for the aquatic and dependent wildlife.

Larry Walker
Lakemont, Ga



"Larry Walker"
<amosndixie@alltel.net>

10/01/2007 10:21 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Saturday, Sept 27 process critique

I found, and still find, the process for input on the 9 management alternatives to be most confusing. I am still not sure of whether or not my ranking (A-F or n/a) is right. Some of the questions are inverted.

The consultants that set up this process should be fired. I've never seen such a confusing process.

I think all data gathered in the format used is suspect and should be treated with great suspicion.

Larry Walker
Lake



**"Doug and Eedee
Adams"**
<edadams1@alltel.net>

10/01/2007 11:06 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Chattooga North Fork - Evaluation of 9 Alternatives

Attached (in a MS Word document) please find my evaluation and comments for the 9 management alternatives.

These comments have been submitted by E-mail only and within the time constraints specified. Please include my evaluation and comments in the public record.

Sincerely, Doug Adams, PO Box 65, Rabun Gap, GA 30568

Phone 706 746 2158 E-mail edadams1@alltel.net



Boating Zoning - Alternative 071001.doc

DOUG ADAMS
P. O. Box 65
Rabun Gap, GA 30568
October 1, 2007

Mr. John Cleaves
USDA Forest Service, Sumter National Forest
4391 Broad River Road
Columbia, South Carolina 29212-3530

Subject: [E-mail Comments on Revised Set of Preliminary Alternatives by 5 p.m. Monday October 1](#)

Dear John,

Thank you for this opportunity. Needless to say that I was confused by the evaluation form instructions offered at the workshop on Saturday (9/29/2007). I believe I now can understand what is expected for the evaluation forms.

By taking more time to carefully review the Alternative #1 explanation sheet, the 5 revised alternatives and the 3 new alternatives, and by taking time to comprehend the grading system for the evaluation forms, I have now completed the evaluations with my added comments.

John, as I told you at the workshop, I don't believe you are being fair to all stakeholders when you introduced 3 new alternatives without allowing a 30-day public comment period.

It is obvious that the Forest Service is seeking to find a compromise fair to all stakeholders. It is also obvious that not all recreation activities are compatible. As the Integrated Report stated on page 96, "*Separating uses by space (zoning) is among the most common ways of addressing use conflicts in land-based settings.*" "*In river settings, segment zoning is also common, particularly for separating motorized and non-motorized uses (dozens of WSRs or segments have been designated non-motorized).*" It appears that the fair and proper compromise was found 30 years ago and it is still valid today. It allocated 36 miles of the Chattooga for whitewater boating activities (including steep creeking for private boaters on West Fork / Overflow) and the North Fork's 19 miles were allocated for visitors seeking foot travel activities in an environment of solitude, remoteness, and tranquility (including quality trout fishing).

During the Saturday afternoon workshop session, I saw some comments on the tables about long walks either to access the river at Whitesides Cove (Alternatives #4, #5, #6, #8 or #9) or the long walks to exit the river (Alternatives #5 or #9). I understand the feeling. That was the way my friends and I felt over 30 years ago when the backcountry 4WD roads were closed in the North Fork corridor. But we knew that limited access was the best management for the long-term future of the river. We knew that the walk would separate the visitors that are seeking solitude and remoteness from the bridge visitors unwilling to invest the time and effort. If boaters feel the walk-in or the walkout is unfair and discrimination, they can go to the lower river or Overflow instead. On the other hand, the existing visitors to the Chattooga Cliffs, above the East Fork or to the Rock Gorge have invested time and energy to walk both ways (in and out) for their solitude without encounters and interference. So if limited boating with a long walk is allowed, the individual has the choice to either pay the backcountry dues or to go somewhere else. For the backcountry angler, we don't have somewhere else.

Zoning ensures that different and conflicting types of users are physically separated. Zoning is a time tested, fair, and legal land (and water) management practice. Zoning of conflicting activities is good stewardship. I believe Alternative #3 will provide the best protection for the North Fork's backcountry ORVs of solitude and remoteness for present and future generations for the lowest annual cost to the Forest Service and with maximum value for local economies.

Following are my evaluations and comments on the 9 alternatives.

Sincerely, Doug Adams

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

1

Woody Debris

F “It is not clear what is meant by ‘enhance woody debris recruitment’ or ‘limited woody debris removal’ in the six alternatives.”

[Change: all alternatives now retain the language from current management.]

Does this change mean there is a CONF Standard for the WILD segment of the West Fork, another Standard for the Chattooga Cliffs WILD segment in NC and a third Standard for the Rock Gorge WILD segment? That is unacceptable. All segments of the National W&S Chattooga must managed under one uniform Standard.

At the workshop (9/29/2007), I asked several Forest Service employees, “Who can approval removal of LWD in the Ellicott Rock Wilderness?” All replied the Regional Forester must approval the use of power tools in the Wilderness. Some said the District Ranger might authorize LWD removal with hand tools, same as clearing a trail. Others said that LWD removal in the stream requires Regional Forester approval, maybe even HQ approval. If the Standard is to allow LWD removal in the Wilderness, there must be clarity under what condition LWD can be removed and clearly define who has the authority to authorize such removal.

A uniform Standard is also needed for WILD segments to clarify under what conditions LWD can be removed and who has the authority to authorize LWD removal.

Proposed Encounter Goals

A “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

The overarching requirements of the Wild and Scenic Rivers and the Wilderness Acts establish the goals on encounters in Alternative #1. The WSR Act protects and enhances the backcountry ORVs of solitude and remoteness for present and future generations. The Wilderness Act will not permit diminishment of the outstanding opportunities for solitude and secures an enduring resource of wilderness for present and future generations. With education and improved law enforcement, this could be upgraded to “A+”.

1. Excessive group encounters - Wilderness: Presently encounters are excessive only on the trail between Burrell’s Ford and the East Fork inside the Wilderness (SC side).
2. However, most trail encounters do not cause conflict or interference (an exception is a hiker with an unrestrained dog).
3. Most of the DH encounters are one sided; an angler on the trail see an angler in the river and keeps walking. The angler in the river never knew the other went by. No problem!
4. Presently there are few backcountry angler encounters because anglers visit small sections of the river with their envelope of solitude and all are generally move slowly in the same direction (upstream).

Permit System

C “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

1. I know “special use” permits are available, but there was no mention of them made in any of the Alternatives.
2. If any alternative allows boating, the Standard of “No commercial boating” must be further defined. There must not be special use permits (commercial) that allowed for boating shuttles or rental boats or boating leaders on the North Fork.

Your Missing Issue Manage biophysical impacts on the natural resource of water quality - Erosion control and sediment trapping from public roads inside the corridor (namely Burrell’s Ford Road, Bull Pen Road, and Whiteside Cove Road).

COMMENT: The existing Zoning Management has provided visitors to the National W&S Chattooga a variety of choice for recreation experiences ranging from world-class whitewater boating, to steep-creeking private boating, to excellent trout fishing, to a sanctuary for solitude and remoteness. Expanding private boating into the North Fork will destroy this sense of balance that has worked so well for over 30 years.

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

2

Proposed Encounter Goals

C “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

- 1. The encounter goals still seem too low in Alternative #2.**
- 2. The present encounters between foot travel visitors do not cause “interference”. A person simply walks on another 10 minutes to find a personal “envelope of solitude.”**
- 3. Most of the DH encounters are one sided; an angler on the trail see an angler in the river and keeps walking. The angler in the river never knew the other went by. No problem!**

Permit System

F “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

I believe this Alternative fails to say, “what would it look like.”

Your Missing Issue

]

Parking: I am OPPOSED to Alternative #2 because:

- 1. It will create a safety hazard at Highway 28, Burrell’s Ford Bridge and Bull Pen Bridge with people parking outside the corridor and walking along the public roads to reach the river.**
- 2. This will also be a negative for visitor experience.**
- 3. Undesignated parking will create unnecessary law enforcement problems.**
- 4. Vehicle break-ins are a problem in designated parking areas and would be more of a problem with dispersed parking.**

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

3

Proposed Encounter Goals

 A+ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

The overarching requirements of the Wild and Scenic Rivers and the Wilderness Acts establish the goals on encounters in Alternative #3. The WSR Act protects and enhances the backcountry ORVs of solitude and remoteness for present and future generations. The Wilderness Act will not permit diminishment of the outstanding opportunities for solitude and secures an enduring resource of wilderness for present and future generations. Education and law enforcement will be needed for compliance.

- 1. The new group size Standard, designating user-created trails for disbursement, and new camping Standards will reduce encounters.**
- 2. The present foot travel encounters do not cause “conflict” or “interference”. A person simply walks on another 10 minutes to find a personal “envelope of solitude.”**
- 3. The only concern with Alternative #3 is the future growth factor. I believe enforcement of “no net gain in parking capacity” will address this concern.**

Permit System

 NA “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

COMMENT:

I believe Alternative #3 will provide the best protection for the North Fork’s backcountry ORVs of solitude and remoteness for present and future generations at the lowest annual cost to the Forest Service and with maximum value for local economies.

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

4

Proposed Encounter Goals

B “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Alternative #4 gets a B instead of B+ because it does not apply seasonal boating restrictions above Bull Pen. Warm weather boating above Bull Pen Bridge will create conflict and interference with existing visitors (swimmers, photographers, hikers, anglers, etc). The waterfall under the Bull Pen Bridge is likely to be a boating play spot, attracting skilled Extreme Low Flow (ELF) boaters and attracting spectators (similar to Bull Sluice). Non-skilled warm weather boaters may be attracted to the ½-mile stretch above Bull Pen Bridge.

Permit System

A “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

The self-registration in Alternative 4 is adequate.

Boating Above Highway 28 Alternative 4

B	Inflatable kayaks should not be permitted.
NA	Tandem craft and rafts should be considered.
	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating. (Add seasonal restriction and remove the Time-of-Day restriction. Time-of-Day has little value in 12/1 – 3/31 season.)
A	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
C	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered. (The level should be raised from 2.4 to 2.6)
C	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

High number of March encounters: Each year the Chattooga visitation surges during the last half of March. March is the 4th most popular fishing month in the North Fork backcountry and most college spring breaks are in the last 3 weeks of March.

COMMENT: I suspect the “trigger” will simply discourage self-registration by boaters, unless there is consistent enforcement.

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

5

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

D “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Level of 2.3 is too low. It should be raised from 2.3 to 2.6. The waterfall under the Bull Pen Bridge is likely to be a boating play spot, attracting skilled boaters and attracting spectators (similar to Bull Sluice). Non-skilled warm weather boaters may be attracted to the ½- mile stretch above Bull Pen Bridge.

Permit System

A “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

The self- registration in Alternative 5 is adequate.

Boating Above Highway 28 Alternative 5

F	Inflatable kayaks should not be permitted.
NA	Tandem craft and rafts should be considered.
C	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
D	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
F	Proposed boating should also be limited <u>to specific seasons</u> and/or to a <u>specific time of day</u> to further reduce the potential for conflicts with other users.
D	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered. (Level of 2.3 is too low. It should be raised from 2.3 to 2.6)
D	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed. (“D” because boating did not avoid the Backcountry below Burrell’s Ford.)
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

Need to add Time of day restriction to boating (10 AM - 5 PM).

Frontcountry conflict: The Burrell’s Ford Bridge scenic segment is the most congested and overused/abused section of the North Fork. If boating is allowed in or through the Burrell’s Ford Bridge scenic segment, I believe there will be interference, conflicts, and confrontations between frontcountry anglers and boaters. Allowing boating access through the Burrell’s Ford Bridge scenic segment would be rolling back the calendar to 1976.

COMMENT: I suspect the “trigger” will simply discourage self-registration by boaters, unless there is consistent enforcement.

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

6

 new

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

F The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals

[Some alternatives allow for more encounters in some places than in others.]

This has already been tried for 30 years below Highway 28 with disastrous consequences for visitors wishing to avoid conflicts and interference while seeking solitude and quietness. Allowing unrestricted boating will cause numerous encounters, interference, and conflict in the DH section alone, not to mention backcountry and Wilderness segments, and will cause enduring harm to Wilderness values and to Backcountry ORVs.

Permit System

A How would a permit system be initiated and what would it look like?

[Some alternatives include a permit system or possible permit system, and some do not.]

The self- registration in Alternative 6 is adequate.

Boating Above Highway 28 Alternative #6

F	Inflatable kayaks should not be permitted.
	Tandem craft and rafts should be considered.
	Group sizes should be the same for all users.
F	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
F	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
NA	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
F	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

Protection of the aesthetic values of natural resources such as remoteness and wildness, the proper regard for the rights of others to solitude, and the responsibility of preserving these values intact for future generations.

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

“The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”
D-

[Some alternatives allow for more encounters in some places than in others.]

The waterfall under the Bull Pen Bridge is likely to be a boating play spot, attracting skilled Extreme Low Flow (ELF) boaters and attracting spectators (similar to Bull Sluice).

Permit System

A “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28 Alternative #7

NA	Inflatable kayaks should not be permitted.
	Tandem craft and rafts should be considered.
A	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
A	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
A	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users. (Time of Day restriction not needed in cold weather)
NA	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
D	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed. (Take-out at Lick Log would raise this to a “C”)
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

- 1. No cap on future growth of boating:**
- 2. Not protecting the Delayed Harvest angling experience – Economic value loss.**
- 3. Backcountry angling interference and displacement - Economic value loss.**

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

8

Proposed Encounter Goals

F “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Allowing unrestricted boating for 3 years will cause numerous encounters, interference, and conflict in the DH section alone, not to mention backcountry and Wilderness segments. Three years will cause irreversible harm to Wilderness values and to Backcountry ORVs.

Permit System

C “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

I have a concern about the future permit system. I believe this Alternative fails to say, “what would it look like.”

Boating Above Highway 28

Alternative #8

F	Inflatable kayaks should not be permitted.
	Tandem craft and rafts should be considered.
B	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
F	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
NA	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
F	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

- 1. Damaging to Wilderness values and to Backcountry ORVs.**
- 2. Loss of Regional & National value: The North Fork, it will no longer be one of the nation’s 100 best trout streams.**
- 3. Not protecting the Delayed Harvest angling experience – Economic value loss.**
- 4. Backcountry angling interference and displacement - Economic value loss.**

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

9

Proposed Encounter Goals

A- “The encounter goals are too low, especially around the bridges and in the Delayed Harvest Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

1. **“Encounter adaptive management strategy” must be adjusted for encounters that do not cause conflict (when a foot travel visitor can simply walk on for an envelope of solitude) verses encounters that cause conflict and interference (such as angler – boater).**
2. **Most trail encounters do not cause conflict or interference (an exception is a hiker with an unrestrained dog).**
3. **Most of the DH encounters are one sided; an angler on the trail see an angler in the river and keeps walking. The angler in the river never knew the other went by. No problem!**
4. **There are few backcountry angler – angler encounters because anglers visit small sections of the river with their envelope of solitude and all are generally move slowly in the same direction (upstream).**
5. **The waterfall under the Bull Pen Bridge is likely to be a boating play spot, attracting skilled Extreme Low Flow (ELF) boaters and attracting spectators (similar to Bull Sluice).**

Permit System

A “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

The self-registration in Alternative #9 is adequate.

Boating Above Highway 28 Alternative #9

A	Inflatable kayaks should not be permitted.
	Tandem craft and rafts should be considered.
A	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
D	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating. (Season provide some protection)
B	Proposed boating should also be limited <u>to specific seasons</u> and/or to a specific time of day to further reduce the potential for conflicts with other users. (Season should be 12/1 – 3/10)
	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
A	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

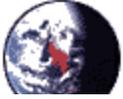
Your Missing Issue 1. This Alternative does not provide protection of the Chattooga Cliffs and Upper Ellicott Rock Wilderness from Extreme Low Flow (ELF) boating. ELF boating can cause biophysical damage to the streambed and spray zone.

2. However, it does avoid the Burrell’s Ford Bridge scenic segment, which is the most congested and overused / abused section of the North Fork. (Excellent!)

3. And it avoids the one section where encounters are excessive, between Burrell’s Ford and the East Fork inside the Wilderness. (Very Good)

4. The cold weather boating eliminates non-skilled boaters. (Excellent!)

COMMENT: Of the 6 boating alternatives, in my opinion #9 causes the least damage to the North Fork’s ORVs and will result in the least conflict with foot travel visitors.



"Thomas Johnson III"
<tommyj@st-pc.net>
10/01/2007 11:16 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc: <jcleeves@fs.fed.us>
Subject: Visitor Use Capacity Analysis, Upper Chattooga River

Dear Sirs:

I recently bought 8 acres on Highway 28 one mile north of the Russell bridge. I visit the area frequently and have fished extensively the Chattooga and its tributaries north of the bridge over the last several years. The attraction of the area to me is its wilderness, and the chance to catch occasionally, and, in my case, to release wild fish.

Every definition of wilderness that I know cites the limited presence of man in interaction with the wild environment. The rugged terrain and forbidden development in the Upper Chattooga area naturally limits man's interaction with the wild environment to those more easily accessible, less wild areas. Only the few travel much farther, and thus, wilderness is preserved. It would appear to me that allowing access by boat, as is proposed in Alternatives 4-9, opens up the entire area north of the Russell bridge to significant impact by man upon the existing wilderness, as opposed to what now occurs.

Furthermore, as no doubt you are aware, boating, particularly via kayak, even in limited numbers, will change fish habitat significantly, particularly negatively impacting the few wild fish in the area. I believe an argument can be made that without wild fish, there is limited wilderness. If the idea is to turn this area into a Disneyworld water park for the elite extreme kayaker, then Alternatives 4-9 would seem to me to provide that opportunity to the detriment of others who wish to enjoy, and preserve wilderness.

Any decision to change the status quo should carefully consider the proximity of the area to the ever expanding city of Atlanta. I live in the suburb of Buckhead: once the new road is completed through Clayton, it will take me exactly two hours to drive to the Russell bridge. Offering additional utility to the boater will attract many more visitors to the wilderness area than, in my view, wilderness can support and endure.

Finally, I find the proposed permitting systems frankly laughable in their universal unenforceability. And, as a taxpayer, I am outraged that my tax dollars may go to pay for Medivac-ing someone out of the area who has challenged the Chattooga in some sort of boat, and lost. If boating permits are the ultimate decision, proof of insurance covering Medivac and other emergency services ought to be required, at a minimum.

It is significant to me that those pushing for boating access north of the Russell bridge currently provide instructions on their website for their members to contravene the law as it now stands. People who do not show good faith should have their agendas carefully considered for elements hidden within:

http://www.americanwhitewater.org/content/River_detail_id_3446_

Sincerely,

Thomas Marion Johnson, III
110 East Andrews Dr, Suite 316
Atlanta, GA 30305
tommyj@st-pc.net

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in this message is considered confidential and is intended for the sole use of the person to

whom it is addressed. So there.



"Jones, Ann"
<Ann.Jones@alston.co
m>

10/01/2007 12:15 PM

To: comments-southern-francismarion-sumter@fs.fed.us
cc: "Jones, Bob" <BJones@arbys.com>, jcleeves@fs.fed.us, "Wyatt
Stevens" <WStevens@roberts-stevens.com>, mike@tupelotoys.com,
mitchellbetty@gmail.com
Subject: comments on the revised set of alternatives

I attended the 7/14 workshop and morning session of the 9/29 workshop and was disappointed to see that the number of alternatives had grown to nine and I was being asked to "grade" the alternatives as to how they addressed certain issues that were set forth during scoping. I don't know why I thought we'd be closer to a resolution by now, but it was frustrating and disappointing for me. It feels like the process is being slowed by too many alternatives and additional issues.

As I recall, this entire project was based upon the following:

"Issues related to how to achieve this desired condition include:

1. Should there be new standards limiting trailheads, trails and/or campsites?
2. Should there be new standards limiting group sizes, encounters between user groups and/or access?
3. Should there be new boating opportunities on the Chattooga River?
4. Should there be new standards limiting group sizes, encounters between user groups and/or access if new boating opportunities are allowed?"

Without knowledge of the costs, I have a hard time determining the value of the workshops I've been participating in.

Is it possible to present alternatives with additional information including cost and feasibility columns?

For example, what does Alternative 1 cost and what is required, staffing, volunteers, equipment, materials, etc.

If you implement Alternative 2, how will the cost and feasibility columns be different from 1? and so on.

I'd also like to know where the funding for the current management come from? Are there enough funds to implement the other alternatives?

Thank you!

Ann Jones

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"Charlie & Kathy Breithaupt"

<knc615@windstream.net>

To: <comments-southern-francismarion-sumter@fs.fed.us>

10/01/2007 02:31 PM

CC:

Subject: Comments from GA Council of Trout Unlimited - Chairman Charlie Breithaupt

1 How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Woody Debris

_____F_____ "It is not clear what is meant by 'enhance woody debris recruitment' or 'limited woody debris removal' in the six alternatives."

[Change: all alternatives now retain the language from current management.]

There are too many differences between the three forests. One plan needs to be adopted and enforced.

Proposed Encounter Goals

_____A_____ "The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals."

[Some alternatives allow for more encounters in some places than in others.]

This will work with enforcement.

Permit System

_____C_ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

2 How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

 C “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

.Encounter goals are too low.

Permit System

 F “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Loss of parking will cause hazardous conditions and encourage break-ins. Lots of problems for enforcement

Your Missing Issue

3 How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

_____A “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

This has worked well for years..

Permit System

_____N/A_____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

*#3 will protect the
river*

4

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

 B “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

 A “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

- B* Inflatable kayaks should not be permitted.
- N/A* Tandem craft and rafts should be considered.
- N/A* Group sizes should be the same for all users.
- A* Boating solo would be unsafe during these remote, high-water conditions.
- F* The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
- A* Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
- C* With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
- C* The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
- A* The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

Seasonal boating: Dec 1-March 1. Minimum level should be 2.6 at HW 76

5

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

___D___ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

.Level of 2.3 is too low.

[Some alternatives allow for more encounters in some places than in others.]

Permit System

___A___ “How would a permit system be initiated and what would it look like?””

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

- F* Inflatable kayaks should not be permitted.
- N/A* Tandem craft and rafts should be considered.
- C* Group sizes should be the same for all users.
- A* Boating solo would be unsafe during these remote, high-water conditions.
- D* The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
- F* Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
- D* With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
- D* The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
- A* The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

_____ *Add 10AM-5 PM restriction for boating.*

6 How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

_____ **F** _____ The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals

[Some alternatives allow for more encounters in some places than in others.]

Permit System

_____ **A** _____ How would a permit system be initiated and what would it look like?

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

All F

Inflatable kayaks should not be permitted.

Tandem craft and rafts should be considered.

Group sizes should be the same for all users.

Boating solo would be unsafe during these remote, high-water conditions.

The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.

Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.

With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future.

A more adaptive approach needs to be considered.

The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.

A

The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

7

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

_____F_____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

_____A_____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

Inflatable kayaks should not be permitted.
Tandem craft and rafts should be considered.
Group sizes should be the same for all users.
Boating solo would be unsafe during these remote, high-water conditions.
The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future.
A more adaptive approach needs to be considered.
The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

8 How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

____F-- “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

.This would be a disaster for the river.

Permit System

____C_ “How would a permit system be initiated and what would it look like?”

Need details of how it would work.

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

- F* Inflatable kayaks should not be permitted.
- F* Tandem craft and rafts should be considered.
- B* Group sizes should be the same for all users.
- A* Boating solo would be unsafe during these remote, high-water conditions.
- F* The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
- F* Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
- N/A* With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
- F* The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
- A* The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

_____ *Alternative #8 is unacceptable!!*

9

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

_____ **A** _____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

This alternative should protect the river if some boating must be allowed.

Permit System

_____ **A** _____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

- A** Inflatable kayaks should not be permitted.
Tandem craft and rafts should be considered.
- A** Group sizes should be the same for all users.
- A** Boating solo would be unsafe during these remote, high-water conditions.
- C** The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
- B** Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
- A** The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
- A** The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

_____ *Season should be Dec 1 –March 1 for boating.*



"Sheehan, Gary"
<GSheehan@kilpatricks
tockton.com>

10/01/2007 03:35 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc: <jcleeves@fs.fed.us>, <rberner@fs.fed.us>, "Joseph Gatins"
<jgatins@alltel.net>, "Richardson, Susan"
<SuRichardson@KilpatrickStockton.com>
Subject: Georgia ForestWatch Comments Re Upper Chattooga Alternatives

Attached above are the comments of the Georgia ForestWatch in response to the U.S. Forest Service's request for comments on the current list of proposed alternatives for recreation management of the Upper Chattooga River.

Please let me know if you have any difficulty opening the attached or if you need any additional information. A hard copy is also in the mail to Dr. Jerome Thomas.

Thanks

Gary R. Sheehan Jr.
Kilpatrick Stockton LLP
Suite 2800
1100 Peachtree Street
Atlanta, GA 30309-4530
t 404 815 6192
f 404 541 3265

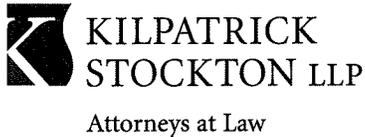
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KILPATRICK
STOCKTON LLP

Attorneys at Law

Suite 2800 1100 Peachtree St.
Atlanta GA 30309-4530
t 404 815 6500 f 404 815 6555
www.KilpatrickStockton.com

direct dial 404 815 6192
direct fax 404 541 3265

GSheehan@KilpatrickStockton.com

October 1, 2007

Dr. Jerome A. Thomas,
Supervisor, Sumter National Forest
USDA Forest Service
4931 Broad River Road
Columbia, South Carolina 29212-3530

Re: Comments on Proposed Alternatives for Recreation Management on Upper
Chattooga River

Dear Jerome:

This letter is filed on behalf of our client, Georgia ForestWatch, in response to the U.S. Forest Service's request for comments on the revised and new alternatives made public on Thursday, September 27, 2007 in connection with its reviews of recreation management on Upper Chattooga River. Our response is timely and meets the agency's extended deadline for commenting of 5 p.m. Monday, October 1. It also is substantive and thus meets all requirements for standing to comment under the National Environmental Policy Act.

Georgia ForestWatch is a not-for-profit forest conservation group dedicated to protecting and restoring the native ecosystems of Georgia's Mountain and Piedmont public lands and to informing the citizens of Georgia about these forested landscapes. Its representatives have been closely involved with the visitor capacity use analysis for the North Fork and have attended every public meeting held on the issue, both as ForestWatch representatives and as members of Friends of the Upper Chattooga, the umbrella organization formed to help protect the Chattooga's wild and scenic values, educate the public to threats to these values, and assist the Forest Service in arriving at a decision that protects this river's resources. Georgia ForestWatch is an interested party to the Forest Service's request for comments and offers the following for your consideration.

First, we reincorporate by reference all comments previously filed with your office on behalf of Georgia ForestWatch regarding this matter, including without limitation, our letter of September 11, 2007, with attachments.

US2000 10347897.1

Second, we must point out that by providing a mere 96 hours to comment on these new alternatives, the Forest Service appears to be acting in an arbitrary and capricious manner and in apparent violation of the spirit and the black-letter law of the National Environmental Policy Act, 42 U.S.C. 4321. This type of compressed deadline simply does not permit a reasoned and suitably deliberative evaluation of the new material. We are now close to *two years* into the Forest Service re-visitation of this complex issue. We, and other stakeholders, have patiently participated in this lengthy decision-making process and object to this seemingly hasty attempt to wrap it up.

Moreover, the agency's methodology of trying to elicit public input on the NEPA alternatives via a confusing grading "checklist" in the charged atmosphere of the public meeting conducted in Clayton, Georgia on Saturday, September 29, raises additional questions about your adherence to NEPA regulations. Many present that day felt like they were taking part in a rushed, ad-hoc experiment. At a minimum, the agency should have reopened the comment period for another 30-day scoping period in order to better enable informed comment on both the revised alternatives and, especially, the three new alternatives.

The new urgency in what has previously been a plodding pace raises legitimate concerns as to whether the agency is moving forward too hastily, without conducting (and making public) the full and fair, NEPA-mandated effects analyses that we have been seeking for months. This unfortunate impression was given added credence by the "podcast" radio interview granted by the head of the ID and Core Teams and your overall project coordinator, John Cleeves. In that interview, Cleeves opines that "we're changing the policy" regarding no-boating on the Upper Chattooga. The subsequent events at the alternatives workshop in Clayton on Sept. 29 leave the clear impression that Sumter officials are poised to overturn better than three decades of smart forest management for reasons unknown, undocumented and unsupported.

Nevertheless, in an effort to cooperate with this effort, we offer the following comments:

Comments Common to Alternatives 1-9:

- **Large woody debris:** The new proposal to "maintain current management" regarding this important aquatic resource is simply unworkable, in that the three national forests with management responsibility for this 21 miles of the Wild and Scenic Chattooga River have different standards for dealing with this issue. Rather, we suggest a tripartite amendment common to the three affected Land and Resource Management Plans so as to emphasize "recruitment of woody debris." By that we mean that no removal of large woody debris (pieces larger than four feet long and four inches in diameter on the small end) will be permitted unless it poses a threat to private property or public infrastructure (such as bridges.) The need for removal must be determined on a case-by-case basis, and, in general, all three national forests must

agree to let nature hold sway over which dead and dying trees are going to fall in the river. Let them stay where they drop – after all, this is a Wild and Scenic River!

- **Tributaries:** If one understands current management in Alternatives 1-3 (no boating,) and proposed management to permit various forms of boating in Alternatives 4-9, the Forest Service currently permits creeking on all tributaries to the Upper Chattooga, but not the North Fork. Under the boating alternatives, boating would be allowed in some form on the North Fork, but would “not include tributaries.” As explained by Forest Service personnel at Station No. 4 during the public meeting in Clayton on Saturday, this new tributary rule would be applicable only in those portions of the tributaries within the confines of the narrow Wild and Scenic River corridor. This does not make sense and would be virtually impossible to manage and regulate. The agency needs to explain this tributary detail more clearly and suggest a workable solution to the situation. The easiest way to do so, again by plan amendment, would be to ban all boating all the time on all tributaries to the North Fork of the Chattooga, from their spring heads all the way down to their confluence with the main stem.
- **Group sizes:** Again, management of group sizes along this part of the river is different from national forest to national forest, often depending on whether visitors are in the Ellicott Rock Wilderness. It would make sense, again by plan amendment, to adopt a new standard uniform to Sumter, Chattahoochee and Sumter National Forests. Our suggestion, previously filed, is that this number of pedestrians be somewhat lower than 12 persons and that it be applicable to the entire corridor (not just the Wilderness,) and all groups, no matter their organizational affiliation. A starting point for discussion is brought forward in Alternative No. 9, which proposes a maximum group size of six for all groups. Were boating to be allowed anywhere on this stretch of river, we would suggest a minimum of two paddlers in the two boats (for safety reasons,) and a maximum of four single-capacity boats for any one group.
- **Encounters and solitude:** The agency asks the public to comment on the “encounter goals” for the various alternatives. We would note that it should instead be asking how to enhance the Outstandingly Remarkable Value of solitude and the primitive nature of the corridor at issue, which the agency is supposed to enhance by federal law under both the Wild and Scenic River and Wilderness Acts. Rather than trying to elicit comment on how to increase a number of acceptable encounters in this area, the U.S. Forest Service should be working to decrease them – there is no doubt, from long experience, that the best days in this corridor are those in which no other human beings are seen at all.
- **Permit system:** The agency should maintain current management in this instance – no permits and no self-registration for any pedestrians along the Upper Chattooga. Were any form of boating to be allowed, we reiterate that it would only be fair, both for safety and monitoring reasons, to require a permit for any and all boaters on this part of the river (not self-registration.)

- **Commercial boating issues:** It is disingenuous for the Supervisor of the Sumter National Forest to declaim that the pro-boating alternatives would not allow use of the river by commercial outfitters or any commercial interests, when he and his ID Team, in fact, would quietly open the door to commercial exploitation of the river under several of the boating alternatives. This would be the inevitable result if boating on inflatable single kayaks, inflatable tandem kayaks, tandem (hard) kayaks and four-persons inflatable rafts were permitted on the river – as such craft are routinely rented to the public by outfitter-guide companies. Such outfitters, in turn, could be expected to expand their “services” to the Upper Chattooga by shuttling boaters to put-in and put-out points, as they currently do under license on the 36 miles of the Lower Chattooga River. If the Forest Service is actually interested in prohibiting commercial expansion on the headwaters, it must limit this form of “creeking” to self-guided boats owned by individuals – and require those paddlers to certify as such on the permit they are issued for use of the river.
- **“Missing issues:”** While the Forest Service does not appear ready to actually pay much attention to this long list of significant issues, it merits repeating today that the agency is required under any number of federal laws, including the National Environmental Policy Act, and its own manual and handbook and internal regulations to evaluate the direct, indirect and cumulative effects of each alternative, including biological, physical, economic and social effects of the proposals. FSH 1909.15 at 15. Evaluation of these issues has either not been done to date or, if it has been done, has not been made available to the public. It is thus unfair, arbitrary and capricious to ask the public to “grade” aspects of the various alternatives on a rank of A to F, and comment on the details therein without completing and publicizing the required analysis. Georgia ForestWatch reiterates its previous comments on the many significant issues raised by this entire process, and reincorporates by references its letter of September 11, 2007, as well as the related missives filed with your planners by Friends of the Upper Chattooga on both June 29, 2007 and July 28, 2007. The latter provide a fairly comprehensive list of what the Forest Service must analyze as it proceeds with this effort, and we would highlight the following as requiring special attention:
 - 1) **Navigability:** While removing the boating issue from present consideration for the 1.7 miles of private property at the top end of the North Fork, the agency has not answered the pressing question of whether the remaining 19.3 miles of the river are legally navigable under federal and state laws in North Carolina, South Carolina and Georgia. The agency must do so before the public is asked to analyze further boating alternatives.
 - 2) **Precedent-setting national impact:** The agency must evaluate the potential cumulative impact any decision to permit boating on the

North Fork would have on other pristine whitewater rivers of the United States, notably the wild waters of Yellowstone National Park.

- 3) **Biological and archeological surveys:** The various alternatives cannot be properly evaluated unless and until the agency completes a systematic review of the affected corridor for both rare and sensitive plants and archeological sites, and makes the results available to the public.
- 4) **Old growth:** The agency must identify old growth communities in the corridor and along tributaries and specify how these will be protected.
- 5) **Outside consultation:** The agency must consult with affected agencies (U.S. Fish and Wildlife Service) regarding incidence of rare plant species (like rock gnome lichen) and protected animal species (Eastern cougar,) as well Native American tribes and groups (regarding archeological sites,) and other federal agencies (such as the National Park Service, as regards Yellowstone.)
- 6) **Cumulative and economic impacts and matters of economic justice.** Georgia ForestWatch reiterates the many such impacts it brought forward, *infra*, in its letter of September 11, 2007.
- 7) **Fishing and swimming impacts.** Without repeating a lot of extraneous detail, the agency must analyze why current zoning of the North Fork is a good practice today – and has been so for better than 30 years – and how permission for any boating on this 21 miles of river and/or its tributaries would degrade the experience of both anglers and swimmers, and other users, as has occurred on the lower river.
- 8) **Education and law enforcement:** We reiterate that all the alternatives now brought forward by the agency presuppose new practices and procedures and regulations for the Upper Chattooga area. Implementation, whether boating is allowed or not, would require significant commitment of Forest Service personnel and resources, including that of law enforcement officers, and probably reinstatement of River Rangers for the river. The public needs to know, in writing, that the Forest Service can commit such resources to implementation of any alternative before it can properly commit to supporting any alternative.
- 9) **Water quality.** No information made public by the Forest Service to date refers to baseline water quality today and the need for future water quality testing. This is an important factor that should be analyzed as part of the agency's environmental evaluations.
- 10) **Safety.** The Upper Chattooga is flashy and tricky, giving rise to further questions about boater safety, were boating to be permitted on this part of the river. This, too, is a significant issue that must be

properly evaluated, particularly since the Forest Service is now advocating use of craft often rented by inexperienced boaters.

Comment as to revised Alternative No. 1:

- See comments above, as to adopting common practice and standards for all three affected national forests.
- Simply maintaining current management is proving insufficient to protect the wild and special resource that typifies the Upper Chattooga today, but would serve, with some slight amendments, as the best vehicle for doing so into the future.

Comment as to revised Alternative No. 2:

- See comments above, as to adopting common practice and standards for all three affected national forests.
- The elimination of current parking near the Russell Bridge at Highway 28 and elimination of roadside parking within the Wild and Scenic corridor -- while theoretically attractive as a means to reducing crowds -- would create a whole new set of illegal parking problems along roadways outside the Wild and Scenic River Corridor.
- The idea of self-registration for pedestrians should be abandoned. There are better means of gauging visitor numbers and encounters.

Comment as to revised Alternative No. 3:

- See comments above, as to adopting common practice and standards for all three affected national forests.
- As we have previously pointed out to the agency, the proposal for “no net gain in parking capacity” is not detailed enough to properly evaluate. This particular proposal suggests that available parking could be increased in certain areas if decreased in others. What exactly is the Forest Service contemplating in this instance?

Comment as to revised Alternative No. 4:

- See comments above, as to adopting common practice and standards for all three affected national forests.
- Georgia ForestWatch, for reasons previously stated and shared with the U.S. Forest Service is opposed to introduction of boating or so-called “creeking” anywhere on the Upper Chattooga’s 21 miles of wild river, or continuation of “creeking” on its tributaries unless and until a full and comprehensive Environmental Impact Statement of the long-term impacts of increased boating on the Outstandingly Remarkable

Values of the headwaters reaches is completed. If boating were permitted under Alternative No. 4, however, we would make the following comments and ask that they be evaluated by the Forest Service. We reiterate, as in our letter of September 11, 2007, that the proposed boating access point 0.4 mile below the private property in the corridor will almost certainly be bypassed by boaters, given the large and well-defined user-created trail that more directly leads to the river below Whiteside Cove Church. The advent, under this alternative, of allowing up to four groups of boaters per day each with a maximum of six boaters per group (a total of 24 individuals) will add immense parking pressure at both the Old Iron Bridge (on Bull Pen Road,) as well as the small Forest Service parking lot on Whiteside Cove Road. The boating proposed from Bull Pen down to Spoonauger Falls above Burrell's Ford (with the same number of individuals, and the vehicles necessary to servicing them,) will create an even greater parking problem at Bull Pen and exacerbate the situation at Burrell's Ford. You also ask if the Chattooga Cliffs reach should be more protected than other areas of the Upper Chattooga. No, and certainly not more than the Rock Gorge Inventoried Roadless Area -- as wild a section as you ever will visit -- and not more than the reach traversing the Ellicott Rock Wilderness. Current forest management requires special protection for such areas, which would be diminished if boating is allowed there, in any season of the year, or time of day. If any boating is allowed in either section proposed under Alternative 4, it should be limited to Dec. 15-Feb. 15.

Comments as to revised Alternative No. 5:

- See comments above, as to adopting common practice and standards for all three affected national forests.
- Georgia ForestWatch, for reasons previously stated and shared with the U.S. Forest Service, is opposed to introduction of boating or so-called "creeking" anywhere on the Upper Chattooga's 21 miles of wild river, or continuation of "creeking" on its tributaries unless and until a full and comprehensive Environmental Impact Statement of the long-term impacts of increased boating on the Outstandingly Remarkable Values of the headwaters reaches is completed. If boating were permitted under Alternative No. 5, however, we offer the following comment. This revised alternative would create unconscionable parking pressure from Whiteside Cove parking lot to Bull Pen Road, and all the way down to the parking areas in the Thrift's Lake area, and likely contribute to trespass of private property in this area. Were boating allowed under this alternative, we would support use of safety equipment for all boaters, as determined by the Forest Service and make it a condition of the permit that should be required in this case (not self-registration.)

Comments as to revised Alternative No. 6

- See comments above, as to adopting common practice and standards for all three affected national forests.
- Georgia ForestWatch, for reasons previously stated and shared with the U.S. Forest Service, is opposed to introduction of boating or so-called “creeking” anywhere on the Upper Chattooga’s 21 miles of wild river, or continuation of “creeking” on its tributaries unless and until a full and comprehensive Environmental Impact Statement of the long-term impacts of increased boating on the Outstandingly Remarkable Values of the headwaters reaches is completed. If boating were permitted under Alternative No. 6, however, we offer the following comment. The unlimited boating proposed in this alternative (single kayaks, tandem kayaks, inflatables of all sort and four-person rafts) represents a management nightmare, which would overwhelm a fragile natural resource. We understand the agency must propose such a sweeping plan under NEPA, but it should be shelved as unworkable and overly broad.

Comments as to new Alternative No. 7:

- See comments above, as to adopting common practice and standards for all three affected national forests.
- Georgia ForestWatch, for reasons previously stated and shared with the U.S. Forest Service is opposed to introduction of boating or so-called “creeking” anywhere on the Upper Chattooga’s 21 miles of wild river, or continuation of “creeking” on its tributaries unless and until a full and comprehensive Environmental Impact Statement of the long-term impacts of increased boating on the Outstandingly Remarkable Values of the headwaters reaches is completed. If boating were permitted under Alternative No. 7, however, we would make the following comments and ask that they be evaluated by the Forest Service. The proposed boating season of December 1 to March 10 is not restrictive enough, in that it will almost surely create user conflict with anglers and other visitors to the corridor. If any boating is allowed in any sections proposed under Alternative 7, it should be limited to Dec. 15-Feb. 15. The maximum number “of 12 for all users” per each group also creates a problem, in that the number of groups is not limited under this new alternative. This essentially would make for an unlimited number of boaters under this alternative.

Comments as to new Alternative No. 8:

- See comments above, as to adopting common practice and standards for all three affected national forests.
- Georgia ForestWatch, for reasons previously stated and shared with the U.S. Forest Service is opposed to introduction of boating or so-called “creeking” anywhere on the Upper Chattooga’s 21 miles of wild river, or continuation of “creeking” on its

tributaries unless and until a full and comprehensive Environmental Impact Statement of the long-term impacts of increased boating on the Outstandingly Remarkable Values of the headwaters reaches is completed. If boating were permitted under Alternative No. 8, however, we would make the following comments and ask that they be evaluated by the Forest Service. This alternative essentially recaptures the entire Upper Chattooga for boating, but seeks to implement a strategy to limit encounters if they occur at the rate of more than six per day for more than 18.25 days per year. The key question here: how will the Forest Service monitor and count such encounters? But if it manages to do so, and the encounters exceed the 5 percent threshold, we would suggest a return to the no-boating zoning policy in effect today for the Upper Chattooga (an automatic sunset provision, in essence.) Georgia ForestWatch cannot support creation of new user-created portage trails for boaters in this corridor. Limiting group sizes to six individuals for all users is worthy of consideration.

Comments as to new Alternative No. 9:

- See comments above, as to adopting common practice and standards for all three affected national forests.
- Georgia ForestWatch, for reasons previously stated and shared with the U.S. Forest Service is opposed to introduction of boating or so-called “creeking” anywhere on the Upper Chattooga’s 21 miles of wild river, or continuation of “creeking” on its tributaries unless and until a full and comprehensive Environmental Impact Statement of the long-term impacts of increased boating on the Outstandingly Remarkable Values of the headwaters reaches is completed. If boating were permitted under Alternative No. 9, however, we would make the following comments and ask that they be evaluated by the Forest Service. If any boating is allowed in the sections proposed under Alternative 9, it should be limited to Dec. 15-Feb. 15. It also proposes unlimited boating for single and tandem hard boats during the period Dec. 1-March 31, but would seek to manage encounters if they are occurred at a rate greater than five per day for more than 18.25 days per year. It is unclear how the Forest Service proposes to record and evaluate these encounter levels. But if the agency manages to do so, and the encounters exceed the 5 percent threshold, we would suggest a return to the no-boating zoning policy in effect today for the Upper Chattooga (an automatic sunset provision, in essence.) Georgia ForestWatch cannot support creation new user-created portage trails for boaters in this corridor. Limiting all group sizes to six individuals for all users is worthy of consideration.

In conclusion, we decry the process used in the “workshop” on Saturday, but appreciate the agency’s willingness to extend a truly impossible deadline by a mere 48 hours. We ask that the agency and its core planning and ID teams review these comments carefully and that the Sumter National Forest, as lead agent in this effort, better adhere to its own rules and federal law,

Dr. Jerome A. Thomas
October 1, 2007
Page 10

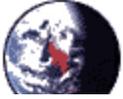
especially the requirements of the National Environmental Policy Act, as this process continues forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary R. Sheehan Jr.", written in a cursive style.

Gary R. Sheehan Jr.

cc: Joe Gatins, Georgia Forest Watch
John Cleeves, USFS
Ruth Berner, USFS



George Custer
<gwcuster@mac.com>

10/01/2007 04:43 PM

To: comments-southern-francismarion-sumter@fs.fed.us
cc:
Subject: Chattooga North Fork

To Mr John Cleeves:

Sir I attended the meeting at Clayton on Saturday.

I must tell you that without a doubt I was overwhelmed and incensed at the attitude and obvious organized agenda that was shown by all the people from the American Whitewater Association.

I was unable to review every booth and certainly could not speak to your representatives because of the monopolization of them by the AWA people.

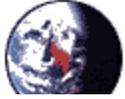
I think it is a travesty that because of these bullying tactics many peoples voices are not going to be heard and I truly believe that if You and the Forest Service allow their tactics to sway you from the great need to protect this precious tract of land from the impact that boating will have on it you are robbing the future generations of an experience that is all too often gone the wayside in our country. The Chattooga corridor is precious, enough of it is set aside and used by boaters, please do not allow the molestation and ruination of the sanctity of this place.

My vote is for no change

this alternative is the most cost effective and resource conscience alternative.

Stewardship is not a popularity contest.

Sincerely,
George Custer
2965 Tate City RD
Clayton GA 30525
gwcuster@mac.com



"Jenn Taraskiewicz"
<jenno@scwf.org>

10/01/2007 05:03 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc: "Ben Gregg" <ben@scwf.org>, "Tony Bebbler" <tbebbler@scprt.com>
Subject: Chattooga North Fork

Hi,
SCWF would like to reiterate our previous comments sent.
Thank you
Jenn

Jennifer Taraskiewicz
Director of Conservation and Stewardship
South Carolina Wildlife Federation
2711 Middleburg Drive, Ste 101
Columbia, SC 29204
www.scwf.org / email: jenno@scwf.org
Phone: **803-256-0670** / Fax: 803-256-0690



SCWF Comments on Chattooga North Fork Oct 2007.pdf



SOUTH CAROLINA WILDLIFE FEDERATION

Your voice in the wild...Since 1931

Transmitted via email and U.S. mail

October 1, 2007

Mr. John Cleeves
USDA Forest Service, Sumter National Forest
4931 Broad River Road
Columbia, South Carolina 29212-3530

RE: Upper Chattooga River

Dear Mr. Cleeves:

The South Carolina Wildlife Federation is the state's largest sportsmen group (about 8,000 members) and promotes sound management of all natural resources through its many educational programs. In response to request for additional comments based upon revised alternatives proposed, the South Carolina Wildlife Federation would like to reiterate our position.

Any alternative that allow boating will negatively impact the biological, biophysical, social and aesthetic features of the river that make it one of the gems of the Wild and Scenic River system, and one of the very few wilderness experiences in the Southeast.

We look forward to the opportunity to comment further on these alternatives as the Forest Service progresses toward a plan to manage and protect this magnificent river for the long-term benefit of the habitat for wildlife, environmental quality, and future users.

Sincerely,

Ben Gregg
Executive Director

Celebrating 75 years of conservation in South Carolina



Liz Mc
<eamcnamara01@yahoo.com>

10/01/2007 04:56 PM

To: comments-southern-francismarion-sumter@fs.fed.us
cc:
Subject: revised alternatives - chattooga headwaters

Dear Mr. Cleeves,

While I appreciate that the expanded alternatives provided more boating opportunities on the upper Chattooga, I still believe the responses from scoping comments have not been addressed. The public has repeatedly asked for fair and equitable access to the river for all users. This was clearly illustrated by the results of the refinement activity at Saturday's public meeting (9/29/2007 - Clayton GA).

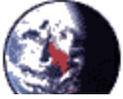
The alternatives still try to implement restrictions on boating, either by zoning, time, season, or river flow. None of these restrictions are acceptable to me. I fully support the need to protect this resource, but I believe that protection cannot be obtained from one targeted user group. Especially a user who has proved to impact the land and water significantly less than other users (camping, hiking, wading fishermen). The impact from boating a water trail is minimal.

I hope your final proposed alternative will take this into account. Fair and equal access - limit all users or limit none.

Sincerely,

Elizabeth A. McNamara
710 Bennett Street
Greenville, SC 29609.

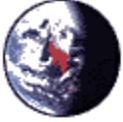
Need a vacation? Get great deals
to amazing places on Yahoo! Travel.
<http://travel.yahoo.com/>



**mbamford123@comcast
.net**

10/01/2007 04:58 PM

To: comments-southern-francismarion-sumter@fs.fed.us
cc:
Subject: comments on final list of alterantives



"Tom McInnis"
<tomcatmc@bellsouth.net>

10/01/2007 04:59 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: See attached letter

Tom McInnis, Chair
South Carolina Council of Trout Unlimited



SC TU revised alternatives response.doc



South Carolina Council

Tom McInnis, Chair

206 Wescott Drive Clemson SC 29631

October 1, 2007

Mr. John Cleeves
USDA Forest Service, Sumter National Forest
4391 Broad River Road
Columbia, South Carolina 29212-3530

RE: Revised alternatives

Dear Mr. Cleeves:

We are writing in response to the revised suggested alternatives for management of the upper Chattooga River released by the USFS on September 27, 2007. Trout Unlimited's mission is to conserve, protect, and restore North America's cold water fisheries and their watersheds. We feel that the management prescription for the Chattooga that the USFS will select will determine how successfully the upper Chattooga will align with TU's mission.

First, I wish to strenuously object to the deadline for commenting on the revised alternatives. I was not able to attend the workshop held in Clayton on September 29th medical reasons, and I was hoping to receive some feedback on the outcome of the workshop before responding further. Instead I learn that even before there is a report posted by the USFS on the results of the workshop, I am expected to comment intelligently on the alternatives. As this process has been ongoing for over 2 years, I cannot understand why such a short response time is required. This approach essentially excludes all members of the public who could not attend Saturday's workshop and are therefore not privy to the discussions and public comments that occurred on the alternatives there. I ask that the deadline be moved back to allow a reasonable opportunity for the public to participate. I suggest 30 days.

As to the alternatives themselves, the comments included in my earlier letter dated August 29 2007 still apply. I have yet to hear any compelling argument as to how increased boating will benefit the river and the wilderness. Therefore TU still prefers that the current management (no boating above the SC 28 bridge) remain in force.

Woody debris – the preferred alternative should include a provision to encourage recruitment of large woody debris. Woody debris provides essential nutrients for aquatic organisms and any policy that allows its removal except in cases where it poses a threat to private property or public infrastructure such as bridges is unacceptable.

Allowable water craft – several alternatives now allow watercraft larger than single person kayaks included in the original draft alternatives (rafts up to 4 person capacity). This only increases our concerns regarding the impact on boating in the upper Chattooga. It will certainly encourage larger

America's Leading Coldwater Fisheries Conservation Organization



parties and even commercial interests to become involved. The preferred alternative, if it includes boating, must allow only single person boats.

Access to trail-less sections – allowing boating between the iron bridge and the East Fork, and through the Rock Gorge, will encourage human intrusion into sections of the river which are currently inaccessible to all but the most adventurous due to the lack of maintained trails. The impact of such intrusion on wildlife must be thoroughly studied before any alternative allows it.

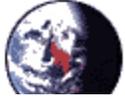
Displacement of anglers – this will certainly occur unless the management of boating includes a higher water level, seasonal restrictions, and minimal boat sizes and group sizes.

Loss of solitude – this is one of the outstanding values of the upper Chattooga that must be maintained. Any preferred alternative must describe in detail how it will be protected in the event that new users are introduced with boating.

I regret that lack of time precludes further suggestions, and I hope that the USFS will extend the comment period.

Sincerely,

Tom McInnis, Chair
South Carolina Council
Trout Unlimited

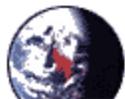


"john autry"
<fritter@tds.net>

10/01/2007 05:03 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: opening the Chattooga Headwaters to non-commercial boater

I myself am not a boater. I am however a nature-lover and always thought that federal land was to be enjoyed by all so long as the integrity of the land isn't unduly compromised. I believe that with proper land-management protocol in place, we can all enjoy the beauty of nature without having to single out any one group of nature enthusiasts. Having hiked into some of the most pristine areas I've ever seen along the Chattooga, and having witnessed debris-scattered landscapes and the unfortunate aftereffects of the holiday masses of car-campers, I understand the local's concern for keeping the headwaters protected. I am grateful that this debate is going on in hopes that maybe some light will be shed on the issue of improving land management of our national parks. I believe that we can make this work. That we can all reach a compromise where anglers and boaters can get along, and all others can enjoy the places that make our country beautiful without destroying all in our wake. Good luck in finding that balance! Take care.



"Ray Gentry"
<regentry@alltel.net>

10/01/2007 05:04 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Responce to revisions

Attached is my response to the latest revisions. Not enough time was allowed to do this correctly and thoroughly.

Ray Gentry
White County

Ray E. Gentry



404-680-6736 Ray Gentry- Alltel.vcf chattooga last issues.doc

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

1

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Woody Debris

____F____ “It is not clear what is meant by ‘enhance woody debris recruitment’ or ‘limited woody debris removal’ in the six alternatives.”

[Change: all alternatives now retain the language from current management.]

Proposed Encounter Goals

____A____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

____C____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

____A____ Having one user group spoil this unique treasure for all other users is a tragedy. The boaters have 99% of all rivers to run but they want to ruin it for this last hope of a quality wilderness experience. Look at what they have done on the rest of this river and other rivers. It is shameful for them to insist on killing this small unspoiled section for their selfish pleasure at the expense of all other users.

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

2

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

_____C_____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

_____F_____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

____A+____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

____NA____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Your Missing Issue

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

_____B_____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

_____A_____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

B	Inflatable kayaks should not be permitted.
NA	Tandem craft and rafts should be considered.
	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
A	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
C	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
C	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

_____F_____ Wilderness values and economic loss are big losers

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

5

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

“The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”
 ___D_____

[Some alternatives allow for more encounters in some places than in others.]

Permit System

___A_____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

F	Inflatable kayaks should not be permitted.
NA	Tandem craft and rafts should be considered.
C	Group sizes should be the same for all users.
A	Boating solo would be unsafe during these remote, high-water conditions.
D	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
F	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
D	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
D	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

___F_____ Economic and wilderness values are big losers.

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals
 ___F_____

[Some alternatives allow for more encounters in some places than in others.]

Permit System

A How would a permit system be initiated and what would it look like?

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

F	Inflatable kayaks should not be permitted.
	Tandem craft and rafts should be considered.
	Group sizes should be the same for all users.
F	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
F	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
NA	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
F	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

Local economic loss is certain and loss of wilderness values. Economic loss is certain to impact local communities as encounters increase and wilderness experiences diminish as demonstrated on the west fork.
 ___F_____

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

_____F_____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

_____A_____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

NA	Inflatable kayaks should not be permitted.
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A	Group sizes should be the same for all users.
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NA	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
D	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

_____F_____ economic loss is certain to impact local communities as encounters

increase and wilderness experiences diminish as demonstrated on the west fork.

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

_____F_____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

___C_____ “How would a permit system be initiated and what would it look like?”

[Some alternatives include a permit system or possible permit system, and some do not.]

Boating Above Highway 28

F	Inflatable kayaks should not be permitted.
	Tandem craft and rafts should be considered.
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A	Boating solo would be unsafe during these remote, high-water conditions.
F	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
F	Proposed boating should also be limited to specific seasons and/or to a specific time of day to further reduce the potential for conflicts with other users.
NA	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
F	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

Damage to wilderness values, economic loss

How well does this alternative respond to each of the following issues? Please assign a grade of A, B, C, D, or F, or NA (not applicable).

The issues that follow were identified from public comments on the six preliminary alternatives and have prompted revision of those alternatives or the creation of entirely new ones.

Proposed Encounter Goals

_____B_____ “The encounter goals are too low, especially around the bridges and in the Delayed Harvest area. Current use levels already exceed these encounter goals.”

[Some alternatives allow for more encounters in some places than in others.]

Permit System

_____A_____ “How would a permit system be initiated and what would it look like?”

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D	The Chattooga Cliffs area should be more protected from the potential impacts associated with boating.
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	With so little flow data available in the upper river, it would be very difficult to select rigid restrictions now that meet the desired outcomes in the future. A more adaptive approach needs to be considered.
A	The boating alternatives should go further to reduce the potential for user conflicts by being more restrictive with the conditions where boating would be allowed.
A	The tributaries should not be considered for boating where boating is being proposed.

Your Missing Issue

Not provide protection to cliffs & above



"Ray, Tim"
<TRay@Shelbyed.k12.a
l.us>

10/01/2007 05:19 PM

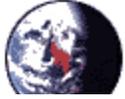
To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Upper Chattooga Comments

To Whom it May Concern.

After reading the 9 Scoping Options from the meeting this past Saturday I would like to support Option/Plan 8. I feel it is the fairest plan for all users.

Thank you

Tim Ray
170 Hidden Valley Drive
Montevallo, AL 35115



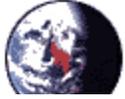
"Chris Osborne"
<chris@illstreet.com>

10/01/2007 05:51 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Headwaters Boating

While I think the alternatives we've been presented with for the management of the Chattooga headwaters are a step in the right direction they still unfairly limit boaters. Why are boaters being limited while nobody else is? Boaters should be given the same access to the headwaters that fishermen are granted. I even believe boaters to have a much lower impact on the environment than fishermen. Please help us in our endeavor, we appreciate your help thus far.

Chris Osborne
C.E.O. illstreet
864.316.9939



Patrick Patin
<p_patin@yahoo.com>
10/01/2007 06:33 PM

To: comments-southern-francismarion-sumter@fs.fed.us
cc:
Subject: Chattooga Headwaters Alternatives Meeting and Decision

John Cleeves,

I would like to get straight to the point. I was extremely disappointed in the 9 management options the USFS provided. None of the 9 options accurately reflect the issues raised during the scoping process. In addition, the public has overwhelmingly requested fair and equitable access for all users. The 9 alternatives released on 9/27/2007 still do not do this – they still unfairly limit boating on the upper Chattooga by time, zone, season or flow. They still unfairly restrict the number of boating users compared to non-boaters and basically discriminate against boaters for no legal or logical reason.

All user groups should be allowed to enjoy this beautiful resource. And the USFS should be given the tools to manage this resource, restore this resource to a pristine state and keep it that way for our children to enjoy regardless of whether they are an angler, hiker, boater or who knows what. My concern is that boating has very little environmental impact compared to angling and hiking but for some reason, boating has been banned while the other user-groups have trashed the area. Have you seen it? There's trash on the trails, camp sites and fire rings are too numerous to count and trails meander everywhere and the stream is filled with trout species that are hurting the natural ecosystem. Boaters didn't do this. The USFS, anglers and hikers have done that to the WSR. Most likely causal visitors but definitely not boaters. They have been banned. So, I'm curious, why aren't other user groups being banned?

I've hiked most trails in the WSR. I've also tried my hand at trout fishing on many occasions. I also enjoy boating on the Chattooga. My hope is to restore and preserve this area for all user groups to enjoy.

Thank you for your time,

Patrick H. Patin
3452 Autumn Drive
Doraville, GA 30340
(404) 274-4381



Roger Huff
<grapeape30144@yahoo.com>

10/01/2007 06:52 PM

To: comments-southern-francismarion-sumter@fs.fed.us
cc:
Subject: Upper Chattooga Forester Servive Management Plan Alternatives

Dear FS:

I have participated in the public meetings and workshops for the review of the Upper Chattooga River Management Plan.

First of all I do not feel that the Forestry Service has adequately addressed the issues at hand to the Upper Chattooga River effectively.

The alternatives are biased and lack support to the objectives in the actions listed below each one.

The section regarding private property area still needs to be addressed.

The workshop held September 29th was incredibly bizarre. While attending I was dazed by the lack of the scientific approach to determining the right alternative. Instead we were forced to ignore our stance on issues and try to improve alternatives that clearly were biased in nature. As workgroups I felt we should have been trying to narrow down the alternatives through a rational, scientific approach.

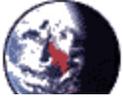
In my opinion there are two issues:

- 1) Is there scientific based analysis that shows that boating has an impact of the resource? The capacity analysis and biophysical impact studies have shown that they do not. So, include boating as a user group period.
- 2) Existing use has created a significant biophysical impact on the resource. Develop a plan that includes all user groups, but also manage that use to minimize the impacts to the resource.

Sincerely,

Roger Huff

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"Cline Paul A"
<cline.pa@mellon.com>
10/02/2007 09:16 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: AWA supported option...

Access based on the AWA support option please.

** Data Classification: External **

Paul Cline

Bank of New York Mellon

IT -Asset Servicing Technology

Room 151-0805

500 Grant St.

Pittsburgh, PA 15258-0001

cline.pa@mellon.com

412-234-4326

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Comments on the new Chattooga alternatives Dated September 29th 2007

To the Chattooga Analysis Team.

Thank You for the opportunity to comment on the alternatives.

Option #3 is the best option for managing the Chattooga.

Although alternative # 4, #7 and #9 are well thought-out compromises with potential, as written, they do not protect and enhance the majority of the OR values of the Chattooga WSR.

Alternatives #6 and #8 look only at the egocentric demands from AW under a single user's perspective on one portion of the overall resource. These alternatives do not protect the resource or appear to consider any other visitors within the corridor. These alternatives should not be considered and clearly violate the statutes governing the management of this resource (see my previous letters).

Below are my detailed comments

#1 Status Quo

The Forest Service has put too little effort into evaluating the many benefits of the current management policy.

The thirty-year-old policy insures that a variety of visitor experiences are available somewhere along the Chattooga Wild & Scenic River. Diversity is available. There are opportunities for world-class kayaking below Route 28, and opportunities for solitude and excellent trout fishing above Route 28. The resource has provided something for everyone.

Expanding kayaking further up-river would impact the diversity of this range.

The Forest Service has not researched, analyzed, and recorded current conditions along the entire Chattooga in order to establish a clear base line against which future changes and conditions in the river corridor can be measured. Adaptive management without complete understanding of current conditions is meaningless.

This options protects the aquatic habitat as well as current visitor experience associated with the recreational ORV but does not allow for the mitigation of trails and campsites created by the current overuse of the area.

#2 Manage encounters among existing users. Eliminating some parking lots and roadside parking, without adding new lots outside the corridor, would create significant visitor limitations from current levels. Parking capacity at Burrell's Ford and Grimshawes Bridge already exceed capacity during peak season and without development, Bull Pen's parking areas could not accommodate half of the forecasted boater demand.

Moving backcountry trailheads away from the river and limiting parking are a good suggestions. Both need further evaluation. Collecting data from current visitors regarding their use of the river would provide a baseline for these suggestions. Unless they are based on data as to the types of current users, any possible benefits from these two suggestions remain highly speculative.

A comprehensive long term plan for a visitor trail system is needed. Such a plan would improve the ability of the resource to accommodate more visitors.

This solution emphasizes protecting the esthetics scenery and resource related ORVs greater than any other alternative. It does put the most restrictions on the recreational ORVs.

#3 “Freeze-frame” approach

This is the best of all the nine alternatives.

It mitigates most existing problems associated with overuse without significant impact to the recreational OR values..

One suggestion: **do not allow user created campsites anywhere in the corridor.**

#4 Manage biophysical impacts on natural resources and encounters between boaters and anglers by establishing zone, season, and flow limits The seasonal and flow restrictions are a good solution to overcrowding which will result from increased usage. Why are these not included in the Chattooga Cliffs reach? Separating the area from Bull Pen to the put in below Green Creek into 2 management areas merely appears haphazard. Maximizing boater impact on an area that the USFS published has excellent fishing and scenery without any review of boatability and impact on hikers and swimmers would be in violation of NEPA mandates.

Since both boaters and anglers can pursue their activities at the 2.3 foot level, the 2.3 foot year round level is far too low to avoid conflict, especially on the Chattooga in North Carolina.

The boater put in point on the Chattooga Cliffs will be significantly impacted by the increased activity there. This access point can hardly accommodate increased activity.

There is no way of enforcing the requirement that boaters leave the river at Lick Log Creek access point. Boaters will not stop at Lick Log Creek

- Campsites, Water-levels and Trails (see bottom).

#5 Manage encounters between boaters and in-water users and manage biophysical impacts on natural resources by limiting trails, campsites, group size, and parking:

Any new policy that includes boats should start with limits and a mandatory permit system for boaters. Review the current capacity "trigger system" downstream for compliance. User capacity limits are changed as managers and management change bringing further overcrowding and degradation to the resource.

Downstream should be included in the encounter standards. The USFS manages the entire Chattooga and is not limited to merely studying the sections of the river included in the appeal. Of course, there will be no appeal by the boaters in the areas where they already boat. This does not mean that a study of the area where boating goes on is not helpful in making decisions regarding the area above Rte. 28. For example, the non-boater overcrowding along the lower river and West Fork would be alleviated by making it available to boaters from 10AM to 5PM only. This would give back to the anglers a quiet, early morning time when they could fish free from the intrusion of boats while allowing the boaters continued access. No effort has been made to enhance the non-boating recreational OR values during this entire process.

- Campsites, Water-levels and Trails (see bottom).

#6 Manage biophysical impacts on natural resources and encounters between users by limiting trails, campsites, group size and parking and provide boating opportunities restricted only by natural flows

Natural flows do not and will not separate conflicting activities and will open up opportunity well beyond capacity. This policy will diminish the experience for current visitors. The option shows the USFS as having no interest in or consideration for the many understudied user groups and a clear bias toward boating. **All members of the Friends of the Upper Chattooga (FOTUC) will appeal any alternative with unrestricted boating because the USFS will be in clear violation of the statutes associated with managing this resource.**

There is insufficient parking at Bull Pen to accommodate the new user group. No increase in parking capacity while adding new activity will result in an immediate, de facto limitation of visitors at Bull Pen.

- Campsites, Water-levels and Trails (see bottom)

#7 Provide boating opportunities while limiting impacts to other users by implementing season restrictions for boaters Restricting boating seasonally to the winter months (12/1 to 3/10) protects water activities during the summer and is a reasonable start to a compromise. (see #9)

Allowing a maximum of 12 boaters means likely 12 boats accessing the river and going down at once. That definitely impacts other users as well as creating new portage trails and more use along the banks of the river. This would be disastrous for the resource and visitor experience

How many user groups of 12 are allowed? This option appears to allow as many groups of 12 as may want to enter the resource every day except for the seasonal restriction on boats. How is the USFS going to limit the number of groups using the resource? How do you know how many group encounters there have been and how can you enforce limitation of the number of encounters?

Closing existing trails while opening new trails for portaging is counter productive to the river and its environs and inequitable to current visitors.

Permitting user-created campsites along with new portaging trails in and along the river is a disaster for the resource especially in the North Carolina reaches. Additional campsites at access points will degrade these areas. Camping only at designated areas should rule. Except where developed camping facilities currently exist, designated sites should be over 1/4 of a mile from access roads.

- Campsites, Water-levels and Trails (see bottom).

#8 Manage carrying capacity by applying balanced limits to all users through adaptive management

Allowing resource use to be determined by the users until the USFS determines that there has been abuse, and it steps in to alter its management plan will not work. The timing is too slow and unwieldy. By the time 3 consecutive years have passed and 2 years of indirect measures have been implemented, 5 years will have passed and the conditions and demands will have changed completely. Users will have suffered on the ground and in the field from conflicts with other users. The resource will have been depleted by use beyond its capacity if indeed it has any capacity for use, or is it that we are just declaring that it has a capacity for use. Leaving the carrying capacity up to users is a recipe for chaos. This option diminishes the experience for existing visitors **All members of the Friends of the Upper Chattooga (FOTUC) will appeal any alternative with unrestricted boating because the USFS will be in violation of the statutes associated with managing this resource.**

This option limits visits to Bull Pen since there is insufficient parking there to accommodate additional user groups.

- Campsites, Encounters, and Trails (see bottom)

#9 Maintain solitude by managing encounters among all users through adaptive Management Seasonal kayak restrictions offer an excellent compromise on the social issues. Seasonal restrictions are imperative if boating is allowed. They minimize the social and goal conflicts which kayak expansion will create. Continuing the foot-travel-only policy during the higher-use times helps protect the experience for others on this part of the resource. A seasonal limitation will reduce use during peak seasons when the resource is already used beyond

capacity. Restricting boaters during the summer months when swimmers, picnickers, and hikers are most prevalent will reduce river conflict. Seasonal restrictions allow time for the resource to recover.

- Campsites, Encounters, Water-levels and Trails (see bottom)

With “so little flow use data available”, it would be impossible to establish standards that will protect the existing OR values of swimming, fishing, wildlife viewing, scenery and biology. For this reason the EA should document the LAC collected desired conditions and acknowledge the lack of visitor-type data. The suggestion of adaptive management without having first “rigorously explored” and documented the potential social and resource impacts appears haphazard and arbitrary.

The USFS are eliminating the upper 1.7 miles from the EA, yet this stretch was included in the remand decision. The EA should include this stretch with clear documentation as to why the area will not be opened up to public. It is clear that the USFS can not allow boating on this stretch because it WILL result in trespass. It is also clear that the EA must include language that protects property rights not “avoids” an issue that it dragged through two years of public analysis. If ANY boating is allowed in NC ,the indirect impact that USFS action may have on private property must be documented in the EA.

The USFS originally stated that the area “just above Grimshawes bridge”, AKA slide rock, will be reviewed as part of the study. It appears this area has been removed from consideration. Since the current policy is no boating here, the future policy must remain no boating unless a NEPA review is followed. We are glad to see the USFS will continue with protecting such a valuable swimming hole.

Thank you for your time.

From,
Michael Bamford
Member Whiteside Cove Association
Member FOTUC

Camping: “user-created” campsites along with an increase in use from boating would be a disaster for the resource. This is especially true on the NC reaches of the river. More campsites at access points, which are also focal points, will quickly degrade these areas. Camping in designated areas should be the rule everywhere! Designated sites should be moved over ¼ miles from access roads, except where developed camping facilities currently exist.

Trails: Closing existing visitor trails while allowing “new portage trails” to accommodate boaters is counter productive and completely inequitable to current visitors.

The impact associated with all the newly required portage trails requires documentation.

Encounters: Why limit encounter strategy to upstream? Can this be used to improve the angler situation below highway 28? Will anglers finally get something back after years of growth have force anglers up stream?

Upper Access Point: The section between the proposed put-in (4/10th Downstream of Greens Creek) and Norton Mill Creek is very marginal boating waters but the best trout waters on the entire Chatanooga Cliffs reach. The bull Pen area remains a popular day-sue site for family picnics and swimming. A hike to the Chattooga Cliffs is currently rewarded unobstructed natural scenery. The proposed "trail" is steep and is not designed for wet-weather use at forecasted boating levels; during heavy rains is simply a run-off gully and high susceptible to erosion.

1. Consider starting boats 1/3 mile east of Iron Bridge at the existing roadside campground with no boating above that point.
2. Consider County line Rd. Norton Mill Creek.
3. Consider access Below the Iron Bridge as the uppermost access point.
4. Burrells Ford a the uppermost access point has been ignored.

Tributaries: The indirect impact on boating each tributary requires being documented within the EA on any alternative that includes boating.

Encounter Capacity Limits: Any new policy should start with limits and a mandatory permit system for boaters; capacity triggers should be evaluated elsewhere for compliance. Capacity limits with deferred action are rarely instituted because surveys normally show a high-level of use satisfaction; because visitors already displaced are never included in a surveyed.

Boaters will avoid self-registration if they are aware of trigger levels. The USFS's unwillingness to impose capacity limits as recently as 2004 on boats downstream proves that "trigger levels" are simply a diversionary tactic to management that would protect those wanting a more passive visitor experience.

Overall user counts do not record the swap from one activity to another. Anglers displaced by kayaks are never included in data. User counts do not include displaced visitors.



"Davis, Don"
<Don.Davis@gta.ga.gov
>

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc: "Davis, Don" <Don.Davis@gta.ga.gov>
Subject: Chattooga River Management Alternatives

10/04/2007 06:55 PM

Dear Sir or Madam,

I have reviewed all nine Alternative Plans, and continue to support **Alternative #1**.

I do so because I have never felt pressured by human presence above the Highway 28 bridge. That appears to be due to the remote nature of that section of river, parking limitations, limited formal trails and lack of "civilized amenities." Those very factors are attractive to me, as they are unattainable nearer my home in Dacula, GA. They are the reasons I drive two hours or more just to enjoy the remoteness while fishing for very healthy trout. Adoption of Delayed Harvest regulations by GADNR has made the locale even more exciting during mid-winter.

There is no clearer contrast with all other trout streams in Georgia. Fishermen with whom I share the river have been kindred spirits who go out of their way to avoid contact with an angler they encounter. Contrast that with fishing experiences along metro Atlanta's Chattahoochee River; crowds, poachers, power boats, platoons of kayaks, crime and trash are made tolerable by visits to the peaceful Chattooga.

If experience by USFS indicates that usage must be limited to prevent damage to the river or its environs, I would support it.

Now we are asked to share the upper section of the river with paddlers. The Chattooga River's size dictates either fishing or boating may occur, but not both. That conflict does not exist with birders, hikers, photographers or other guests I've chatted with while donning or removing my waders. Why should I drive an extra hour in order to see more boats and watch them put the fish down? I can get that on the Hooch, plus a Hooters is nearby.

Very truly yours,

Donald E. Davis
301 Church St.
Dacula, GA 30019

678.640.8134

My email address will change from ddavis@gta.ga.gov to Don.Davis@gta.ga.gov soon. The old address will work for a short period of time.



"rtjk@alltel.net" <rtjk

10/05/2007 07:36 PM

Please respond to

"rtjk@alltel.net"

To: <comments-southern-francismarion-sumter@fs.fed.us>

cc:

Subject: chattooga river

I am in favor of proposal no. three. Thank you



"Patricia Mc Ewen"
<phorses@earthlink.net
>

To: comments-southern-francismarion-sumter@fs.fed.us
cc:
Subject: chattooga up

10/22/2007 09:58 PM
Please respond to
phorses

I am a boater who has grown up in Mountain Rest, South Carolina. I have been kayaking since the age of 15 and have a deep belief that locals who live here and have explored this river should be able to paddle this river. Before any "consultant" from Jackson, Wyoming told us the "new name" of a section on the upper Chattooga, we had run the section more than a few times and have the constant fear that testosterone filled paddlers from Asheville with no respect whatsoever for this river would explode onto it on high water days with the upcoming decision that is to be made by the Forest Service.

On the river, fear lies in having to rescue paddlers who do not know what they're getting into and who are running the river because it is the newest extreme creek to run in the Southeast. However, the biggest fear lies in the fact that there will be a greater impact on the river. In heavy use times, accommodations will have to be made such as port-a-potties, parking lots, roads, etc. I'm sure that means inadvertently more pollution creeping into the upper Chattooga. All this takes the taxpayer's money in order to accommodate a group of paddlers who have never cared about the Chattooga and had never heard about the Chattooga until American Whitewater (AW) told them they should. After all, why isn't AW fighting to clean up Stekoa Creek? After living out West for a few years and seeing the mismanagement of Yellowstone National Park when it comes to whitewater boating (they don't allow whitewater kayaking at all, there is a \$10,000 fine, but allow motorboats and jetskis on the adjacent lakes), I have to wonder why AW is spending money on the Chattooga, seeing as how AW is a Western organization.

I don't know the politics of AW, but as a boater who saw kayaking before sponsorships and money appeared on the scene, in this decision I fully support the USFS, the Chattooga Conservancy, and anyone else who is opposing this organization who is posing as the "fighter of my paddling rights." I have to hope there are people out there that are truly trying to protect one of nature's greatest masterpieces rather than concern themselves with the newest paddling notch on their creeking belt.

April McEwen
akayaker_2000@yahoo.com



"Wilson, Julie R."
<Julianna.Wilson@vsp.virginia.gov>

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Comments online

11/28/2007 09:51 AM

Hello,

On the first page here:

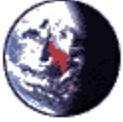
<http://www.fs.fed.us/r8/fms/forest/projects/documents/Chattoogacomments101-163.pdf>

Could you please remove my phone number and e-mail address? I would rather not have this information available online.

Thank you,

Julianna Wilson

Julianna Wilson | Virginia State Police



"Your Name Here"
<username@saulsseism
ic.com>

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Illegal Boating Ban

11/30/2007 12:20 PM

Dear USFS officials,

I am an avid outdoor user, and find the most pristine wilderness areas to be those most worth visiting. The Chattooga is certainly one of these, with great water quality and unregulated streamflows. Whether floating/fishing/birding/hiking or participating in any other low impact use, I am ecstatic to be able to take in what the delicate Chattooga watershed has to offer, particularly in the upper reaches.

Boating has little to no negative impact on the environment when compared to hiking, fishing and other uses. These are also relatively low impact uses compared to ATV's and other motorized uses. Therefore this needs to be taken into consideration when pro-ban propaganda materializes about boaters increasing litter, noise, erosion, and overall detriment to the ecosystem/watershed. Boaters are a highly environmentally conscious group who try to limit intrusion to other users serenity, and practice leave no trace ethics to the highest degree.

The only people who's safety will EVER be affected by boaters is boaters themselves. The arguement of swimmers/anglers/hikers getting hurt by boaters in the river is the most absurd idea and has absolutely NO basis in reality whatsoever. If people swim in the river at the levels whitewater boaters are there, then the only thing that will save these ill planned swimmers would be a kayaker, because to swim the river at levels boaters require is SUICIDE!!! The idea that boaters could jeopardize the safety of other users IS BOGUS.

Finally, assuming that boaters don't pose a safety threat, and they have at least comparable impact (really lower impact) to the environment, then they should be allowed EQUAL access and opportunity to enjoy not only the Chattooga headwaters, but all stream in our national forests.

The non-boating public has a very warped view of the boating contingent who is interested in accessing the headwaters. Their information is not rooted in facts, data, truth, or experience, but only in ignorant and irrational fear. Please keep this in mind when weighing their statement's validity. Kayaking is LOW IMPACT, NOT INTRUSIVE, and NOT A SAFETY RISK TO THE PUBLIC.

The stewardship of boaters is above reproach, and if given the due right to experience the headwaters, boaters WILL organize cleanups, and will take the Chattooga river under their wing. We are an ally to this special place, and we don't have to live in Rabun, Transylvania, Jackson, or Oconee Counties to have a valid opinion. Many "local stewards" fought the Wild and Scenic designation to the bitter end, concerned that they wouldn't be able to spin their tires and leak oil into the river at various fords. They would also now have to actually walk to get to the river. Many "local stewards" are the SAME people destroying the headwaters region with golf courses and environmentally insensitive "summer homes". If anything is a destructive force upon the Chattooga then it's the town of Cashiers, Whiteside Cove, etc. I think the facts on how golf courses, second homes, and motorized vehicles affect the ecosystems of a watershed are clear and readily available. How can these same people preach environmental responsibility?

Anyone who knows the facts can only come to the conclusion that boating is an acceptable, low impact, non-intrusive method of enjoying the Chattooga and all other US rivers. That is why, not as a boater, but as someone who believes both in equal access, and environmental responsibility, I know that alternative 6 is the best alternative. As far as my feelings on the current management system, I would say that something needs to be done to ensure that no new trails are created, unofficial trails should be abandoned, and something should be done to lower litter by fishermen, hikers, and other current users. Boaters will not increase these problems, but work to eliminate them.

Thanks for listening, and good luck.

Kirk Eddlemon

Geologist, Father, Husband, and Steward of our national forests



"Lee Bardin"
<leebhandy@comcast.net>

12/02/2007 09:07 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>
cc:
Subject: Whitewater Kayaking on every river

I am 53 yrs old, a general contractor, who enjoys whitewater kayaking with my 25, 23 & 19 yr old children and all of our friends who share our passion for the outdoor experiences on the rivers.

We insist that we have every right to access that any other citizen has to any natural resource in our country. It is a free country, isn't it?

What logic would allow hikers and fisherman to visit any wilderness area, but would attempt to restrict kayakers? It isn't logical.

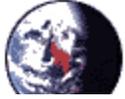
Hikers and fishermen trample much more vegetation. They tend to pack in more items, they leave many more traces of their visits and fishermen, in particular, leave fishing line and other residue behind.

Kayakers only carry their essentials, since the boat and gear are a burden to transport down a path to the river. Then, since the kayak doesn't impact anything as it floats down the river, it must leave far less of a trace than any on land activity. Lastly, where whitewater kayaks go, no one can safely swim or tube.

So why do you consider the illogical ravings of some restrictive special interest groups when the public, as a whole, should and does have equal rights to equal access?

My family and friends spend money to travel to kayak new rivers, stay in lodging, eat in restaurants, shop & buy souvenirs, sight see the area we travel to and positively benefit those recreational areas with increased revenues.

It is an absolute fact that whitewater experiences increase the tourism revenues of those areas.



John Carothers
<jocaroth@mac.com>

12/09/2007 05:29 PM

To: comments-southern-francismarion-sumter@fs.fed.us
cc:
Subject: Chattooga River Kayak Impacts

Greetings. My name is John Carothers. I have a Ph.D in Zoology from the University of California at Berkeley, and I have wildlife experience from Africa to Australia to of course the U.S. I am a biology professor at Cabrillo College in Aptos, California where I teach Ecology and Zoology. My family and I have been summer residents in the Cashiers area for over a decade, and my wife has been summering there since the 60's.

One of the things that draw us to the area is the Chattooga River. I treasure visiting the riparian zone and watching for wildlife. We love finding signs of river otters, luring crayfish from their crevices, swimming, and watching birds. We thrill to come across the various warblers and water birds who live along its banks.

And it is in part on behalf of the wildlife that I speak to you today. Just like mountain bikers, dune buggy enthusiasts, and white water kayakers, each type of wildlife has habitat requirements. But people and wildlife face very different constraints. The activities of mountain bikers, equestrian riders, rock climbers, and dune buggy drivers are allowed in many areas but prohibited in others due to conflicts in management objectives. But that's okay, they do have lots of options anyway. Such regulation is the norm, NOT the exception. And in general this works just fine. People are used to not having their way every time.

Of course, any group is going to represent its own self-interest, and sometimes they'll do it without regard to what other interests are at stake. For example, American Whitewater suggests that kayakers should not face the restrictions that every other outdoor group - even hikers - sometimes encounter. These other groups have nothing near the access kayakers have, but the kayakers want even more. So why do they think they are different than these other people I mentioned? They're not, they just think they should be. Unlike the aforementioned surfers and dirt bikers who recognize compromise, American Whitewater has had access to just about every river system except the Upper Chattooga. They are out of step. And this whole idea of opening up more riparian habitat to a parade of disturbance is out of step with the needs of the wildlife and the management plans set up to give them refuge from the increasing encroachment of humans.

But now what about that other interest group that I mentioned, the wildlife. I said all these interest groups had certain habitat requirements and needs. Take Great Blue Herons. They need waterways without traffic for foraging - they spook and fly downstream a bit when disturbed. Now, my conscience is bothered a bit when I scare one of those magnificent birds, but I know it will continue foraging downstream a ways. The same is true with the kingfishers who flee our approach. And the uncommon Louisiana Water Thrush (*Seiurus motacilla*) and other warblers will tolerate my streamside visits for a short while too.

But our impact is quite different from that of a kayaker, for a kayaker is by nature a moving disturbance. That's the whole point of kayaking - to be moving along a river. And as the Great

Blue Heron moves downstream, so does the kayaker. There is only so far downstream it can go, and the entire time the kayaker is on the river he or she will be pushing that timid bird ever further away from where it wanted to be. That bird and all the others can't come here today and ask for what it needs - a stretch of river where they won't be pursued by a parade of kayakers.

Yes, there are others such as fishermen that use the river too. Now, almost all other people using the outdoors, fishing folk face restrictions in where they can pursue their interests. And like swimmers or nature watchers, their activity is restricted to a small zone at a given time. They don't sweep down the river the pulse of disturbance that kayakers do.

American Whitewater gives you the impression they are live and let live, that they want to open things up for all folks. But that's not true. They themselves have won various lawsuits to keep jet skis off other rivers. They've deemed them inappropriate, and on jetskis I agree with them. But try to apply a rule to them and suddenly they are being "persecuted". They're people too, the t-shirts say. People that feel they are the only exception to rules. But I don't see why that should be so. And what about the rights of the wildlife?

Now at the beginning, I said I wanted to talk in large part about the wildlife along the river. My daughters who are 9 and 10 can sometimes seem in more ways than one like wildlife themselves, as any parent of young children knows. They love watching wildlife and also acting like fish and otters and birds. While doing this, they play near the bases of waterfalls that kayakers would be coming over. At beaches, they separate the swimmers and the surfers and surf kayakers - again, each group has its own areas. But is a kayaker that drove up from Florida going to want or even be able to follow restrictions that are vague at best. I mean, basically this group's thinking is "no kayaking unless you think you can do it." There end up being no restrictions. And that's a public hazard.