From: Allison Barth
To: comments-southern-francismarion-sumter@fs.fed.us; akimbell@fs.fed.us
Subject: Chattooga Headwaters
Date: 07/30/2008 07:28 AM

Dear Sir,

I am an avid whitewater paddler, backpacker and day hiker. Over the past several years I have had the pleasure of hiking, camping and boating in and around the Chattooga wilderness area. I have recently reviewed the latest Environmental Assessment regarding the recreational management of the Chattooga River and find that after five years of meetings, study periods, comments and delays, the USFS has decided to support a management plan that not only unjustifiably discriminates against one user group in favor of another, but also does not go far enough to protect the wilderness area.

The following is a list of my concerns with Alternative #4:

>> Boating in the headwaters is heavily restricted and still banned in the Chattooga Cliffs area and the tributaries of the headwaters. These restrictions and bans are unjustified and should be replaced with unrestricted boating access to all sections of the Chattooga River and its tributaries. I am in favor of justifiable restrictions on user groups in order to protect the wilderness and the wilderness experience as long as it is done in a fair and equitable manner. The Forest Service has failed to complete a competent study of boating and its effects in the Chattooga Headwaters to support any ban or restrictions. Furthermore, the Forest Service has chosen to ignore proof that boating would have no negative impact on the wilderness or the wilderness experience.

>> Unrestricted boating should be allowed on all sections of the Chattooga River and its tributaries because it will not impact other user groups. All the Forest Service needs to do is look at the "Chattooga Headwaters User Capacity Study" held on January 5 & 6 of 2007 to prove this point. In two days of boating the entire stretch of the Chattooga Headwaters at near minimum water levels, the boaters didn't see a single angler, hiker, camper, bird watcher or swimmer. Its obvious that boating takes place in weather conditions and water levels unfavorable to most user groups. Thus, boating will have little to no impact on other user groups' wilderness experience.

>> Unrestricted boating should be allowed on all sections of the Chattooga River and its tributaries because it will have negligible impact on the environment. Any environmental damage concerns the Forest Service has can be eliminated by visiting neighboring Overflow Creek. Overflow is similar in structure and environment to the headwaters. It is considered one of the crowned jewels of boating in the southeast and is boated regularly after heavy rains. With over 25 years of boating use, it shows almost no signs of environmental damage. Boaters don't even leave footsteps.

>> Heavily restricting and banning boating in the Chattooga Headwaters is also legally dubious. No other federally managed river has such bans or restrictions on boating. Therefore, this decision is out of step with the management principles of similar federally managed rivers. Unjustified restrictions and bans are illegal according to the Wild and Scenic Rivers Act and the Wilderness Act. Restricting and banning boating without similar measures being applied equally to other user groups

is simply unfair and discriminatory. Boaters deserve equal protection under the laws.

>> For over a decade the the Forest Service has had time to research the effects of boating on the environment and the wilderness experience in the Chattooga Headwaters. To date, the Forest Service has released no quantifiable data or user capacity analysis to prove why boating should be restricted or banned. The Forest Service has simply placed restrictions and bans on boating in order to continue, as much as possible, the status quo. If the Forest Service has significant quantifiable data to support boating restrictions and bans in the headwaters, please release this information to the public. Otherwise, without proof to the contrary, unrestricted boating should be allowed in the headwaters and its tributaries.

>> Heavliy restricting and banning boating in the headwaters is also not in keeping with USFS management standards. The Office of the Chief of the USFS stated that the original boating ban was baseless and needed to be reassessed. If the original boating ban was baseless, it is logical to assume the new restrictions and bans, without supporting data or analysis are similarly baseless. Again, if the Forest Service has significant quantifiable data to support boating restrictions and bans in the headwaters, please release this information to the public. Otherwise without proof to the contrary, unrestricted boating should be allowed in the headwaters and its tributaries.

>> Alternative #4 is simply a continuation of the 30 year-old total boating ban. It essentially makes it impossible to boat the Headwaters of the Chattooga River legally. With an average of less than 10 legal boating days a year and under severe restrictions of group size, number and daily frequency, only a lucky handful of boaters will ever be able to expereince the Chattooga Headwaters legally. For all intents and purposes, this is still a total boating ban.

>> The many prescribed restrictions for boating the headwaters are, in effect, an undue burden on would-be boaters and an administrative burden to the Forest Service. How will the "daily average mean of 450cfs" be quantified? Who will declare it a boatable day? If its a daily average mean, the day will be declared boatable after it has passed! How will the permitting system work? Will permits be available at only one very out of the way Forest Service station? Will permits be handed out before the day is declared boatable, thus making the permit itself illegal? Who will count the number of times a boater runs the river to insure they run it only once? Who will make sure there are less than six boaters in each group? Who will make sure they don't run the banned sections? How will you educate the boating public on the banned and legal sections of rivers. How will you educate the boating public on the confusing array of restrictions and bans? The restrictions are so severe that, like in the past, some boaters will continue to boat the headwaters illegally. The Forest Service will then be faced with administering the confusing array of boating restrictions, while still chasing illegal boaters on legal as well as illegal boating days. Thus, adding to the Forest Service workload instead of allowing them to efficiently manage the wilderness. Obviously, these restrictions were never ment to honestly allow boating. Again, It essentially makes it impossible to boat the Headwaters of the Chattooga River legally.

>> The Forest Service has chosen to control and restrict much more environmentally damaging user groups with indirect measures. So, hikers who blaze their own trails; campers who trample an area; and fishermen who damage the river banks, leave fishing line in trees, and fish stocked non-native trout are allowed

almost unfettered access to the wilderness area. All this while the enviromentally friendly, seldom seen boater is blacklisted with unjustified severe restrictons and bans. Again, it is time the forest service did the right thing and allowed unrestricted access to the Chattooga Headwaters and its tributaries to boating.

The Forest Service's recommended management plan, Alternative #4, is heavily flawed and should be withdrawn from consideration in favor of Alternative #8. I find Alternative #8 acceptable, with a few adjustments:

>> Allow unrestricted boating on the entire Chattooga River and its tributaries below Grimshawes Bridge.

>> Don't allow rafts. Rafts are not an appropriate boat for the tight nature of the headwaters. Restrict boats to more appropriate water craft such as duckies, kayaks and canoes.

>> Allow limited removal of LWD. Removing LWD in locations dangerous to boaters, such as in rapids or swift current increases the safety of the runs without effecting the ecology of the river. The Forest Service has been sent, and has available, a significant amount of data showing that limited LWD removal will not alter the ecology of the river.

>> Use a permit, or similar quantifiable tracking system, as the backbone for the "adaptive management approach."

>> Include encounter standards based on a real user capacity study. This can then be used to fairly limit total use when encounter standards are consistently exceeded.

>> If the encounter standards are consistently exceeded use indirect measures to limit encounters before reverting to bans or restrictions.

>> Ban the introduction of non-native species or plant life in the wilderness areas. The wilderness is not Disneyland to be physically altered or added to for the enjoyment of user groups. It is to be protected in its natural state. Please consider banning the introduction of anything non-native into the wilderness area.

I applaud the Forest Service to offering Alternative #8. It is a flexible and insightful plan that treats all environmentally friendly user groups equally and complies with the Wilderness Act and the Wild and Scenic Rivers Act. I strongly encourage the Forest Service to abandon Alternative #4 and approve an adjusted Alternative #8, as the final management plan.

Sincerely,
Allison Barth
Duluth, GA