From:	mister OBVIOUS
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River Project Alternative #8
Date:	08/18/2008 10:04 AM

U.S. Forest Service
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.
comments-southern-francismarion-sumter@fs.fed.us

8-18-08
RE: Chattooga River Project Comments
Dear Sumter National Forest,
Craig Smerda
Wausau, Wi.
I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposal. Both treat me and my community of river enthusiasts unfairly and your proposal would not meet my interests. Please consider the following concerns I have regarding this issue:

- The USFS has spent thirteen years searching for a reason to limit paddling on the Chattooga and has found *none*. It is time to open the river to boating.
- The EA is not a user capacity analysis and does not reference one. The AW appeal decision required a user capacity analysis. Where is it?
- No alternative is acceptable because they all include boating bans on the upper Chattooga Cliffs reach and on tributaries – without any justification.
- The EA and preferred alternative are not equitable or protective of the river because they considers boating to be the only management variable, while other larger more impactful uses are not seriously considered for limits.
- The USFS preferred alternative includes a total ban on 2/3 of the upper river, a ban on tributary boating, and allows only 0-6 days of limited boating on the remaining reach – while allowing all other wilderness conforming existing uses in unlimited numbers.. This is not equitable and not acceptable!
- The EA offers no basis for the boating bans and limits
- The EA lacks a full range of alternatives
- The EA is no better or different than the last one, is at least a year late and has wasted millions in tax payer money
- The USFS hired qualified consultants and then ignored their input
- The 450 CFS average daily flow trigger in the preferred alternative is a flawed measure that should be eliminated from any considerations. There is no way a paddler can know this number and will be an administrative burden for the agency.
- Paddlers prefer an alternative similar to Alternative 8 that 1) fully allows boating on the entire Chattooga River below Grimshawes Bridge, 2) allows paddling on tributaries, 3) includes encounter standards based on a real user capacity analysis, 4) will *equitably* limit *total* use only when encounter standards are consistently exceeded, and 5) will do so using all available indirect measures first.
- The public should have the right to float on public Wild and Scenic Rivers regardless of who owns the land along the river.
- All aspects of the "Outstanding Remarkable Values" of Wild and Scenic Rivers should be protected on the entire river, not just in some areas.

Thank you for considering these comments. Please consider conducting a real user capacity analysis and immediately allowing boating in the same numbers, places, and seasons that you allow existing users. *Paddling should be allowed in a similar manner to your alternative number 8*, *except on the entire Upper Chattooga River and its tributaries.*
Sincerely
Craig Smerda (concerned citizen, tax-payer, outdoor enthusiast and paddler)

Bureaucracy
A form of government in which the true power lies in the hands of committees who dictate policy and bureaus that carry them out, with little accountability to the constituency.

This letter should be read by <u>everyone</u>.

From: Claude E. Terry
Reply To: Claude E. Terry
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga Planning Team - Comments
Date: 07/22/2008 11:44 AM

July 22, 2008

Jerome Thomas
Forest Supervisor
Francis Marion and Sumter National Forests
US Forest Service
4931 Broad River Rd.
Columbia, South Carolina 29212

Attn: Chattooga Planning Team

Jerome, Thanks for the opportunity to comment on the draft EA for the Upper Chattooga River. It appears that reasonable comments and input are sorely needed. As a history, I boated the upper river in the early 70's, before the arbitrary, capricious, and probably unlawful closure by the Forest Service in 1976. I obeyed the rule of law, and now, regardless of the eventual access decision, at 70+ years I will never be able to boat those magnificent gorges again.

Similarly, thousands of boaters have seen their prime years pass without ever being able to legally use the river.

The closure issue, this decision and its casual flaunting of equity and rights has been divisive and has produced major questions as to the Forest Service's objectives and ability to handle complex and adversarial issues. As an aside, having a Trout Unlimited executive as the Forest Supervisor for an extended period did not aid in the issue either.

At the start of this process, several years ago, I had conversations with several whitewater clubs people. I assured them that today's Forest Service would be even-handed and give the boaters a fair hearing. It appears I was wrong. To put my response in perspective, please note that I have consulted to Federal agencies since 1969, served as a expert witness on water related issues, and was the Mission Contractor for Region IV, USEPA for Environmental Studies of the impact of Federal actions. The projects often involved public presentations. I have done hands-on and design work for geohydrological restorations on the Chattooga and other Federal projects. In all of these activities, fair and objective consideration of alternatives before acting was essential, and even the *appearance of bias* was to be avoided.

It is counterproductive to address one "use" of the corridor in flowery terms, while starkly pairing the other use alternative with "conflict" or "loss" wherever it

occurs. Yet, the existing rainbow trout fishery is described in your letter and the three pages of alternatives as:

● -"*high-quality* trout fishing experience"-
● -"one of the **unique premiere** trout fisheries for backcountry anglers seeking remoteness and solitude in the southeast"-

● Boating? Boating is mentioned with the need to:

● "Minimize *conflict between boaters* and anglers by establishing *flow* and *season*(al) *restrictions* for boating"
● Maintain a "*boatfree* recreational experience"
● Boating is considered a threat to "*uniqueness*" and to "*unique"* opportunities for enhanced solitude"

There's more, but the simple fact is the fishery is a trout-farm based, put and take fishery based on a species alien to the area, providing recreation to a very few people. There are many questions raised in my mind by the verbal "color" attached to each use. For instance;

● Where on the entire Chattooga River are fishermen excluded to provide *"solitude***"** and *"uniqueness*" of experience for boaters?
● Where do you note the differing impact of shoes of fishermen, hikers, campers, bird watching groups, compared to the passage of a boat?
● There are trail problems noted in the alternatives. Are those trails the result of boaters' visits or of fishermen and hikers?
● There is frequent use of "uniqueness" to describe a put and take fishery, and almost no notice for the incredible white water, and the truly unique boating experience.

The level of skill and perception required to enter and use this wilderness area for white water boating are high. There is a reason that boaters have fought to be allowed to use this segment of the Chattooga, and it is the truly unique white water, not the artificial fishery.

The blatant attempt to make boating more dangerous or impossible by prohibiting removal of " large woody debris" apparently came from a Forest Service sycophant's input. The removal ban would be laughably absurd if it were not so dangerous and unscrupulous. It would be appropriate to list the name of the individual suggesting the protection of woody debris against the loss of life of a hapless fisherman, hiker or boater. I think this suggestion is the height of absurdity.

There is a curious inconsistency about a purportedly fair review that touts fishing as though it were *unique* and had *no* impact, vilifies boating as destroying uniqueness and solitude, ignores hiking, birding and other uses with their impacts, and wishes to leave trees across the stream to the risk of injury and death for boaters, hikers, swimmers, and other users. So much for an objective study.

The *two* different descriptions of the regulatory trigger flow for alternative 4 are curiously unknowable and perhaps not even capable of attempts to calculate, except retroactively. I can visualize boaters detained by Forest Service personnel, standing at some gauge until midnight in the dead of winter, at which point the Ranger say "Aha. Got you. See, the average flow was 451 cfs, but the *mean daily average flow level* was only 448.5 cfs." It is interesting that a basically incalculable number would

have to be calculated before going to the river in mid winter, where you park miles away, walk in with your gear, calculate the river's cfs accurately, enter the river, avoid touching the trees blocking the channel at some point, cannot legally use the most attractive areas of the river, and get out, only to find your calculations were for the "average mean daily flow level", not the "mean daily average flow level" and that you are boating unlawfully. If this sounds ridiculous, it is.

To this point, the Forest Service has been a friendly agency to users of the upper Chattooga, except boaters. The proposed alternative 4 regulations for boating display the same blind bias that has prevailed for 36 years. Surely, after years of delay, we could expect a document without the inherent bias shown in the current proposal.

Please accept these comments as a suggestion that I don't think Alternative 4 is objective, reasonable, fair, logical, or capable of actually achieving balanced management of the Magnificent Upper Gorges of the Chattooga.

Very truly yours,
Claude E. Terry
Atlanta, GA

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