From:	wwkayaking@gmail.com
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Environmental Assessment on Recreation Uses on the Upper Chattooga Comments
Date:	08/18/2008 11:31 AM
Attachments:	Chattooga Comment.doc

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

August 18, 2008

RE: Chattooga River Project Comments
Dear Sumter National Forest,
My name is Brian Pickett, and I reside in Kingsport, Tennessee. I am an avid whitewater kayaker and backpacker. Despite living 200 miles away from the Chattooga, I have frequently made trips to backpack and kayak in the area. I have looked at the headwaters of the Chattooga and often wondered what it would be like to kayak those waters. Despite the fact that many claim kayakers have the ability to enjoy other rivers in the region, I believe all rivers, particularly this one, provide a unique outdoor experience.

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. Furthermore, **I DO NOT SUPPORT ANY OF YOUR ALTERNATIVES.**

The Forest Service provided a number of alternatives, but you did not do a good job of providing a variety of alternatives that treated all user groups equally. The bias showed toward fisherman is obvious in the literature presented by the Forest Service and the given alternatives. I suggest an alternative that opens the entire Chattooga River to private boating. Boaters will be allowed to kayak above flows of 350 cfs on the Burrells Ford gauge. Fishermen will only be allowed to fish below flows of 350 cfs on the Burrells Ford gage on the Upper Chattooga. The Forest Service states this gives an average of 37 days per year for boaters to access the river and 328 days per year for anglers to access the river. This should eliminate any potential conflicts or lost feeling of solitude that both groups are "entitled." Camping should be handled as proposed in alternative three.

The Forest Service attempts to give the illusion that they wish to treat the Upper Chattooga as a wilderness corridor, providing a wilderness experience and solitude to those who wish to experience the land. However, the proposed alternatives and management of the land do not back-up the rhetoric. In order to enhance the wilderness corridor, the Forest Service should close the bridge on the Georgia side of the Burrels Ford Bridge. All stocking of non-native species fish should cease immediately. All stocking of fish by helicopter should cease. Woody debris recruitment should not be promoted, especially with the use of a chainsaw, nor should woody debris be removed from the river unless it is determined to degrade water quality or is an unavoidable danger to the user groups of the Upper Chattooga.

As mentioned above, the Forest Service report shows clear bias toward kayakers with

support being shown to the fishermen. This is made abundantly clear when reading "Assessing Visitor Capacity & Conflict on the Upper Chattooga – June 2007" on pages 67-69. All potential conflicts and problems between the two user groups are purely hypothetical and are told only from the viewpoint of potential problems an angler might face. Boaters were repeatedly called out as a source of impact while other groups were rarely called out for their impact. The user-created trails to the river were probably cause by anglers and hikers, but the capacity analysis simply states that the trails existed and were caused by visitors to the Chattooga.

It is clear the preferred alternative #4 is an attempt to maintain the 30 year boating ban through restrictions and a system that will be unmanageable by the Forest Service. The Forester Service states that only 6 days a year will be boatable under alternative #4. Most boatable days will be lost due to the Forest Service having inaccurate and poorly designed methods to predict stream flows. I do not believe the Forest Service Rangers will be as vigilant as boaters in staying up late at night to watch developing rainfall totals and predictions so that a boatable day will not be lost. Boaters use information late at night and very early in the morning to determine their destination for the day. Will the Forest Service Rangers be willing to put in this extra work? It is clear to see that all boating days will be lost due to inaccurate predictions and a lack of timely information. Alternative #4 is just another boating ban.

I am appalled to read the Final Draft of the Environmental Assessment. It appears the Forest Service has been asleep on the job. The water quality has degraded. User-created trails and campsites have been created and threaten to increase sedimentation. When attending one of the Forest Service workshops, I could not believe the level the Rangers had allowed to area to degrade to. It was only by seeing the big pictures that one could see the poor management of the land. What the Forest Service knows is the introduction of non-native trout attracts thousands of anglers to the headwaters annually. They know these anglers stress the roads and trails of the Upper Chattooga and destroy the banks and beds of the river. They leave behind snagged lines and lures. The anglers are responsible for over 19 miles of unauthorized trails in the wilderness. The Forest Service knows that the non-native trout compete with the Eastern Brook Trout for food and habitat. However, to the Forest Service, this is acceptable and enhances one of their ORVs. What I am most appalled with is the fact that Forest Service can't figure out what is polluting the East Fork of the Chattooga BELOW THE FISH HATCHERY! It seems that with all the money spent to provide rationale to ban boating the Forest Service could have attempted to figure out what was polluting the river downstream of the hatchery. The boating ban was done without an impact study and the environmentally damaging fishing is supported and receives preferential treatment without an impact study.

By the Forest Services on words, the boating ban was put in place in 1976 due to "the boater and angler conflict." The Upper Chattooga Draft Environmental Assessment goes on to state that anglers were "shouting, raft-slashing, rock throwing, fistfights, and gunplay" toward boaters. It appears that this intimidation wants to continue as the anglers and local users feared "that history would repeat itself" if the Forest Service would allow boating on the Upper Chattooga. I believe the Forest Service has the training and ability to ensure that these conflicts do not occur by monitoring the river, put-ins, and take-outs more frequently during the start of the introduction to boating to the headwaters. All perpetrators should be prosecuted to the fullest extent allowed by the law and this should be known from the start. A National Forest is not a playground for those livening in the

immediate communities. It is paid for and funded with federal tax dollars. Locals have no more right to use the land than people who live 200 miles or 3,000 away. Locals and anglers have no right to use intimidation, vandalize, and violence on other users and outsiders to ensure they receive preferential treatment. The Forest Service should not allow these fears and a local bias to influence their decision.

I support restrictions and bans when they are justified and supported with competent scientific user studies and facts. The Forest Service has not these studies and continues to ban boating. The Forest Service has not completed studies on the effects of stocking non-native aquatic species in the wilderness. Yet, they continue to support this practice. The literature provided by the Forest Service shows clear support toward anglers with a clear bias toward boaters. This gives the appearance that Sumter Forest Service is bowing to local pressure and a good old-boy network and, at worst, is simply incompetent.

I ask the Forest Service abandon alternative #4. It is a continuation of the status quo under the veil of lifting the boating ban. Please consider conduction a real user capacity analysis and immediately allow boating in the same numbers, places, and seasons as you allow other existing users. Paddling should be allowed in a similar manner to alternative #8 on the ENTIRE UPPER CHATTOOGA AND ITS TRIBUTAIRIES with the suggestions I gave earlier in my comment taken into consideration.

Thank you for considering these comments.
Sincerely,
Brian Pickett
608 Ridgefields Rd
Kingsport, TN 37660