From: Joseph Gatins
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga boating response
Date: 08/18/2008 02:15 PM

August 18, 2008

Via E-Mail to: comments-southern-francismarion-sumter@fs.fed.us

Chattooga Planning Team

Francis Marion and Sumter National Forests

4391 Broad River Road

Columbia, South Carolina 29212

Re: Proposal for managing recreation uses on the Upper Chattooga River

Dear Chattooga Planning Team,

I have closely followed the USDA Forest Service efforts to craft a defensible response to the American Whitewater lobby group's appeal of the Sumter National Forest plan decision to continue the existing zoning on the 21 miles of the Upper Chattooga, which prohibits boating on those headwaters. That was a good decision when taken 32 years ago, and it still would be a good decision today.

Accordingly, I cannot support the agency's preferred alternative, Alternative 4, which would open the door to limited boating on portions of the Upper Chattooga. The draft "Pre-Decisional Environmental Assessment," moreover, does not adequately support such an alternative. Frankly, after, lo, these many months and years of planning and all the taxpayer money spent on this effort, one would have thought the Forest Service, which brought so many resources to bear on the study of this issue, would have come up with a more thoughtful document.

Its shortcomings, and that of Alternative 4, are many. Among them:

- It lacks a cogent economics benefit analysis.
- There is inadequate discussion and lack of commitment to proper monitoring and enforcement of any new proposed boating – a crippling defect. This is a particularly sore point, at a time when Forest Service budgets are routinely being diminished (except for fire management) and the agency finds itself more and more pressed to meet its already considerable legal requirements to safeguard an increasingly precious resource.
- It does not adequately review the boating situation on the 36 miles of the Lower Chattooga – a real zoo that one would think the agency did not wish to duplicate on the Upper Chattooga.
- It does not contain a final biological evaluation of the natural resources involved,
- It does not adequately protect the outstandingly remarkable values of the Ellicott Rock Wilderness and the pristine, backcountry of the Rock Gorge inventoried roadless area and the wild Chattooga Cliffs reach – especially their quiet and solitude, increasingly rare treasures in this modern-day age.
- It fails to adequately explain or support creation of a new road or trail to let a small boater elite rush down to the river at Norton Mill Creek.
- It fails to assess the long-term, negative and cumulative impacts that boating would have on the natural resources of this stretch of Wild and Scenic River.
- There is no commitment to arriving at uniform rules for managing this resource on the part of the thr4ee affected National Forests (Chattahoochee, Nantahala and Sumter.)
- There is no adequate rule provided or proposed for recruiting the vast amount of large woody debris that will be accumulating in the river as more and more native eastern hemlocks fall into this river.
- It proposes to introduce a commercial aspect to the boating proposal – inflatable kayaks – while at the same time averring that no commercial boating would be permitted.

Accordingly, I would recommend the Forest Service adopt a modified version of the no-boating Alternatives 2 or 3, with greater attention paid to preserving and protecting the wilderness and other backcountry areas listed above. (It goes without saying that I cannot support the other boating alternatives, either.)

This could handily be accomplished with little need for amendment to the draft EA, and still be legally defensible, as I see it. I urge the Forest Service to rethink its stance, abandon the boating alternatives and protect the river, as it has been trying to do for better than three decades.

Thank you for your time.

Sincerely,

Joseph Gatins

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