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To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga Planning Team - Comments
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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,
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