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March 21, 2016

Proposed Rule Amendment
c/o USDA Forest Service, R8 Planning
1720 Peachtree Street NW, Suite 811N
Atlanta, GA 3030

Re: Proposed Rule Amendment

Dear Chattooga Planning Team,

Thank you for the opportunity to comment on proposed updates and clarifications to federal regulations related to floating the upper segment of the Chattooga Wild and Scenic River in North Carolina, South Carolina, and Georgia. On January 31, 2012, the U.S. Forest Service issued decisions to change some of the locations where, and conditions under which, boating would be allowed on the Chattooga Wild and Scenic River. The decision was made to allow limited boating on the upper section of the Chattooga River above Highway 28. As you are aware, existing regulations, Code of Federal Regulations at 36 CFR 261.77, prohibit floating the Chattooga unless authorized by a permit. These regulations do not address the river sections within the Nantahala National Forest in North Carolina. Consequently, the current boater permitting system encourages boaters to violate Federal Regulations. As you are aware, this has been a major issue for Georgia ForestWatch since the 2012 decision was made, and we are glad that the Forest Service is addressing the problem.

The Proposed Rule Amendment changes would add language to the Code of Federal Regulations at 36 CFR 261.77 to include all portions of the wild and scenic river in the Nantahala, Sumter, and Chattahoochee National Forests. The proposed updates would also remove the list of specific locations where visitors can obtain permits, giving the Forest Service the flexibility to change registration locations from time to time to better serve the public, and to possibly allow permits to be obtained online.

The Proposed Rule Amendment also proposes to change the “special use permit” phrase to “special use authorization.”

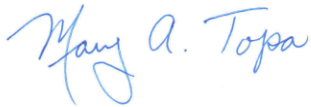
It is Georgia ForestWatch’s understanding that these updates will not change trail access locations (put-ins and take-outs), i.e. boaters will have limited access to the upper sections of the Chattooga at locations designated in the 2012 decision, using access trails finalized in the Chattooga River Boating Access decision. Georgia ForestWatch would like to reiterate that user-created features should not be relied upon for access, and that every effort should be made to protect

the river from sedimentation and biological degradation in general. While recreation is considered to be one of the Chattooga River's Outstandingly Remarkable Values (ORVs), it is not the only one. According to the Wild and Scenic River Act, the Forest Service must place "primary emphasis" on a river's "esthetic, scenic, historic, archaeological, and scientific features," in its administration of the river.

The management framework that the Forest Service has created through the 2012 Decision to protect the solitude and ORVs of the upper sections of the Chattooga Wild and Scenic River can only work with monitoring, informed adaptive management, and enforcement. Georgia ForestWatch would like to see further development of the management plan as applied to access, with a clear articulation of monitoring and enforcement activities.

Thank you again for the opportunity to comment on the proposed rule amendment. We ask that you keep us informed of any changes and/or other developments in this area.

Sincerely,

A handwritten signature in blue ink that reads "Mary A. Topa". The signature is fluid and cursive, with the first name "Mary" being more prominent than the last name "Topa".

Mary A. Topa
Executive Director, Georgia ForestWatch