

Forest Service Response to Comments on Changes to the Sumter Monitoring Plan

American Whitewater Comments		
	Comment	FS Response
1.	<p>American Whitewater is a national non-profit organization dedicated to river restoration, conservation, access, and safety. We were active participants in the Sumter National Forest planning efforts, and advocated for sustainable recreation. We have sought protective and sustainable river management on the Upper Chattooga since at least 1995, and know well the shortfalls of historical monitoring of the river corridor. The new monitoring plan has the opportunity to remedy those shortfalls, but the proposed updates to the monitoring plan do not accomplish this important goal. Please consider the following requests for improvements to the Monitoring Plan.</p>	<p>The March 17, 2016 monitoring notification letter limited the scope to proposed changes that are needed to make the current Sumter Monitoring Plan compliant with the eight requirements of the 2012 Planning Rule.</p>

<p>1. Monitoring Question 9 regarding recreation experiences and use needs to be expanded and modified.</p> <p>During the previous planning process the Forest Service had virtually no data on how many people were visiting the Wild and Scenic Chattooga River, what they were doing there, where they went, how long they stayed, or if their experiences were acceptable/positive. The only exception related to paddlers, who are subject to mandatory permits. This lack of data forced the Agency to conduct a capacity analysis based on “guesstimates” of recreational use and resulted in significant disagreements over various recreational uses. Now is the time to fix this problem. The same monitoring information should be collected for all visitors regardless of activity to bring clarity and equity to future decisions. We request that at least the following Indicators be added to Question 9: Number of people visiting each reach of the Wild and Scenic Chattooga River, and:</p> <ul style="list-style-type: none"> The activities engaged in during their visit (non-commercial paddling, commercial paddling, hiking, fishing, camping, hunting, etc). The duration of their visit The location of their visit The date/seasonality of their visit Flow conditions during their visit Number of interactions with other visitors, activities of those visitors. Perceptions of their experience (positive, negative, etc) <p>2.</p>	<p>Additional monitoring questions have been added to the <i>Revised Land and Resource Management Plan Sumter National Forest</i> (Forest Plan) with the signing of the Decision Notice for Amendment #1 to the Forest Plan in January 2012 (2012 Forest Plan Decisions¹). This is described in Appendix A, pgs. A-3-A-4 of the Decision Notice.</p> <p>Monitoring per the 2012 Plan Decisions started with the award of a contract, <i>Monitoring Plan for the Upper Chattooga Wild and Scenic River’s Front County & Backcountry Recreational Use</i>, August, 2015.</p> <p>As stated in this plan:</p> <p style="padding-left: 40px;">This task plan is one component of a program to document impacts and use levels resulting from the decision. The overriding goal of which is to ensure that use levels are not exceeding capacities and that experiential conditions are meeting standards defined in the EA. The task plan uses quantitative metrics and qualitative surveys to establish estimates of total use, characterize the use by recreational activity, develop an understanding of the quality of the recreational experience occurring at front country sites and backcountry reaches, and identify conflicts and other capacity related issues that occur in the WSR. The methods used in this task were developed to establish a baseline of recreational use and to support future updates so that the land managers can track the effects of management decisions over time.</p> <p style="padding-left: 40px;">This task plan is comprised of the following elements: quantify the number of vehicles at primary</p>
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		<p>public access areas (front country sites) and compare vehicle counts to front country site capacities established in the Decision Notice; develop a relationship between front country parking utilization and backcountry reach use levels conduct randomized surveys to characterize recreational use to identify tolerance and issues associated with backcountry encounters; describe perceptions of crowding and congestion at the front country; and estimate future recreational use and capacity constraints.</p>
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3.	<p>The indicators in the current monitoring/forest plan have been proven to be inadequate, and simply noting that “recreation use and satisfaction” is an indicator is likewise inadequate notice to the public of what exactly will be monitored, where, when, and how. Note also that questions 21a-d in the plan fail to accurately or equitably track even the most basic data needed to justify extreme direct limits like those imposed on Chattooga paddlers (like who else is using the forest, when, and why). These questions are vaguely geared towards arbitrary front country and backcountry distinctions and based on car counts, which are of little value in addressing key questions. It would be unacceptable to make future decisions on visitor capacity without the information described above.</p>	<p>As was stated in the response to comment #1, the scope of this proposed action was to ensure that the Sumter’s Monitoring Plan is compliant with the eight requirements from the 2012 planning rule. The scope did not include an effort to re-evaluate the monitoring questions and indicators in the existing Monitoring Plan.</p> <p>In our Monitoring Reports, we will continue to evaluate the effectiveness of our existing monitoring questions, and if it is determined that changes to the monitoring questions and indicators are necessary, then we will conduct a separate analysis to make those changes.</p>

<p>4.</p>	<p>2. New Question: Are recreational use limits on paddling the Upper Chattooga River in the plan necessary?</p> <p>Forest Service policy is to limit use only when necessary, to utilize indirect limits prior to direct limits, and in Wilderness to minimize limits on sustainable recreation. Yet, the plan contains direct limits on paddling that were implemented prior to indirect limits, and monitoring has shown these limits are unnecessary. This monitoring of paddling use needs to be continued to inform future decisions. This monitoring must include the following indicators:</p> <ul style="list-style-type: none"> • Number of paddlers utilizing each reach of the upper Chattooga, the date of their use, and flow conditions. • Number of boatable days utilized by paddlers, not utilized, and eliminated by the Forest Service limits. • Number of non-paddling visitors on boatable days year round, the date and activity of their visit, and flow conditions (regardless of whether it is a day on which paddling is prohibited or not). Perceptions of those visitors regarding their experiences (questions should not ask leading questions specifically about paddling). <p>The monitoring plan looks (poorly) at impacts of recreation, but fails completely to look at impacts of USFS management <i>on</i> recreation. Sustainable recreation</p>	<p>See comment #3.</p> <p>The 2012 Plan Decisions and associated amendments established boating opportunities using season, zone and flow restrictions. The monitoring plan is used to determine if the desired outcomes are being achieved and avoiding unintended consequences. Adaptive management would be used to address any problems revealed through monitoring.</p> <p>Boater data is gathered via “Floating Permits” and captured in a Forest Service database. The Burrells Ford stream gage continuously records river flows (cubic feet per second) in 15 minute intervals and is used to determine “boatable days” per boating season. The number of boaters at put-in and take-out locations are recorded from the permits into the database.</p> <p>There is no need to add this question since boater information is already being collected and current monitoring questions 21a – 21d will provide the data for the agency to“validate if the prescribed capacities are set at appropriate levels.” (<i>Managing Recreation in the Upper Segment of the Chattooga Wild and Scenic River Corridor</i>, pg. 481). Capacities may be adjusted as appropriate to maintain opportunities for solitude as prescribed in the 2012 Plan Decisions.</p> <p>The District Court for the District of South Carolina, Anderson Division determine, “Upon consideration of the arguments of counsel, the memoranda submitted and the applicable law, the court finds that the Forest Service’s 2012 Plan for Management of the Chattooga WSR complies with the federal law as set forth and analyzed above.” (Civil Action No.: 8:09-2665-MGL, filed 07/30/2013)</p>
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	<p>should have value in the new plan and the USFS should seek to enhance that value.</p>	
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<p>4. Monitoring Question 12 needs additional explanation We assume this question refers to biophysical conditions, though it is impossible to tell the scope of the term “conditions.” What exactly will be monitored under this question, where, how, how often, etc? Question 12 is the broadest possible outline of a monitoring plan, it is not a monitoring plan itself. We request that this question be expanded upon in a subsequent draft of the Monitoring Plan. At a minimum, each element of each Outstandingly Remarkable Value (including the paddling-recreation ORV) must have indicator to ensure that the values that caused the river to be designated are protected and enhanced under the new plan.</p> <p>6.</p>	<p>The most recent analysis of Outstandingly Remarkable Values (ORVs) was conducted during preparation of the environmental assessment, <i>Managing Recreation Uses on the Upper Segment of the Chattooga Wild and Scenic River Corridor</i>. Annual and soon to be biennial reports are also used to track ORVs and water quality during monitoring periods. Forest goals #1 and #28 are specifically reviewed as stated in Appendix E of the Sumter Forest Plan.</p> <p>Goal #1 – Watersheds are managed (and where necessary restored) to provide resilient and stable conditions to ensure the quality and quantity of water necessary to protect ecological functions and support intended beneficial uses.</p> <p>Goal #28 – The Chattooga Wild and Scenic River would be managed to protect and enhance free-flow, water quality and the outstandingly remarkable values of geology, biology, scenery, recreation and history.</p> <p>Biophysical inventories were completed in 2007, large wood monitoring was completed in 2007 and 2014 and endangered, sensitive and locally rare plants have also been monitored since 2007. Recreation monitoring began in 2015 as stated in comment #2.</p>