November 18, 2016

RE: File Code 2710; 1950; 2350
Guided Wade Fishing Trips / scoping notice

On behalf of the Chattooga Conservancy, we hereby submit the following comments relating to
the Special Use Permits (SUPs) application request for guided wade fishing trips on the
Chattooga Wild and Scenic River and the Chauga River. The Chattooga Conservancy is a non-
profit conservation organization working to “protect, promote, and restore the natural ecological
integrity of native Chattooga River watershed ecosystems; to ensure the viability of native
species in harmony with the need for a healthy human environment; and, to educate and
empower communities to practice good stewardship on public and private lands.” The
Chattooga Conservancy has an organizational interest in the proper and lawful management of
public lands within the Andrew Pickens Ranger District. Members, staff and board members of
our organization participate in a wide range of recreational activities on these national forest
lands, including activities in the Chattooga Wild and Scenic River Corridor and the Chauga
River corridor. The Chattooga Conservancy represents the interests of approximately 600 total
members that support our work.

I. Commercial Special Use Permits on the Chattooga Wild and Scenic River

The Chattooga River received status as a wild and scenic river in 1974. Since designation, the
Forest Service has been charged with managing the Chattooga to protect its Outstandingly
Remarkable Values (ORVs) of geology, scenery, recreation and history, with its recreation ORV
referring to the outstanding opportunities for remoteness and solitude that currently exist within
the Chattooga Wild and Scenic corridor. As such, the Forest Service is required to manage the
Chattooga’s recreation ORV in such a way that is not detracting.

Of note is that the agency is also required to develop a “comprehensive river management plan”
(CRMP) that must address resource protection, development of lands and facilities, user
capacities, and other management practices necessary or desirable to achieve the purposes of the
Act (Wild & Scenic Rivers Act). The Chattooga River has no CRMP; thus, in this instance, the
Forest Service is proceeding with permitting commercial guided wade fishing special use within
the wild and scenic river corridor absent formal guidelines that will ensure non-degradation of
the Chattooga’s ORVs. Although the Forest Service has pointed to the January 2012
Environmental Assessment for “Managing Recreation Uses in the Upper Segment of the
Chattooga Wild and Scenic River Corridor” (2012 EA) as sufficient NEPA support for this
commercial special use, we assert that this document falls well short of directly addressing user
capacities and other important management measures that would ensure protection of the Chattooga River’s ORVs vis-à-vis commercial guided wade fishing (and in any case, the 2012 EA does not fulfill the mandate for having a CRMP for the Wild & Scenic Chattooga River).

That said, it’s well known that the Chattooga Conservancy has long-standing concerns with increasing commercial use in the Chattooga Wild and Scenic River Corridor, and how such use may impact and potentially degrade its recreational ORVs. We want to ensure, moreover, that all necessary precautions are taken to ensure that commercial outfitting and guiding recreational special use does not detract from the Chattooga’s ORVs.

Guided wade fishing trips have potential to detract from the Chattooga’s recreational ORVs, specifically concerning its outstanding opportunities for solitude, remoteness and scenery. Therefore, we request the following provisions be incorporated into the temporary special use permits for guided wade fishing trips:

- **Trails:** Ingress and egress to the Chattooga River should occur on designated trails only, and prohibit the use and/or creation of user-created trails. We point to the braided, user-created trails that currently exist above the Highway 28 Bridge on the Georgia side of the Chattooga River. Initially, a singular trail was established for fisherman and hiker access at this location. It began at the end of the parking lot and extended upstream, adjacent to the Chattooga River. Over time, however, with increased use of this trail, user-created “spurs” became established and developed—so much so, in fact, that one is hard pressed to find solitude and remoteness in this location during weekends in the fall.

- **Limit each outfitter to one (1) guided wade trip per day.** The scoping notice is unclear in this regard; i.e., it appears that a single outfitter with multiple guides could conceivably offer multiple trips per day, either staggered or concurrently. And if this were the case, human presence within the Wild and Scenic corridor at a single point in time could be increased substantially. (Note that the 2012 EA clearly acknowledges that angling use during the delayed harvest season often involves crowded conditions that jeopardize the Chattooga’s ORVs.)

- **Monitoring and On-the-Ground Enforcement:** 1) Initiate a monitoring and enforcement program component to the issuance of guided wade fishing SUPs on the Chattooga Wild and Scenic River to determine impacts on the Chattooga’s ORVs. 2) Address user-created trails within the project area to discourage their continued use, and to mitigate and repair resource damage.

- **The consecutive issuance of “short term temporary commercial” special use permits for at least 5 years for guided wade fishing trips further indicates the need to develop a CRMP that would establish user capacities and caps on this commercial use, to protect the Chattooga River’s ORVs.**

II. Commercial Special Use Permits on the Chauga River
Guided wade fishing trips have potential to detract from the Chauga River’s recreational experience. Therefore, we request the following provisions be incorporated into the temporary special use permits for guided wade fishing trips:

- **Access:** No motorized access would be permitted behind gated roads.

- **Trails:** Ingress and egress to the Chauga River should occur on designated trails only, and prohibit the use and/or creation of user-created trails.

- **Limit each outfitter to one (1) guided wade trip per day.**

- **Monitoring and On-the-Ground Enforcement:** 1) Initiate a monitoring and enforcement program component to the issuance of guided wade fishing SUPs on the Chauga River to determine impacts. 2) Address user-created trails within the project area to discourage their continued use, and to mitigate and repair resource damage.

We appreciate this opportunity to submit comments on the guided wade fishing trips scoping notice, and look forward to the Forest Service’s response to each of our points.

Sincerely,

Nicole Hayler