



"John Helms"  
<arkayaker@gmail.com  
>

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: Chattooga Scoping Document

08/28/2007 07:13 PM

Mr. John Cleeves  
U.S. Forest Service  
4931 Broad River Road  
Columbia, SC 29212

RE: Chattooga Scoping Document

Dear Mr. Cleeves,

The USFS's own capacity study demonstrated that boating is an appropriate use of the Upper Chattooga River, yet 5 of 6 proposed alternatives ban boating on some or all of the upper river. The Upper Chattooga's capacity to support whitewater boating is not zero, and all action alternatives must allow at least some boating on the entire river. Any alternatives that limit recreation must do so based on the capacity of the river corridor as determined by real data – and must do so equitably. Please do consider as well the fact that boating on the Upper Chattooga is very limited due to the requirements of Mother Nature to provide sufficient rainfall in order for boating to even become possible, which, as you well know happens in a very erratic and (usually) short periods of total calendar days in any given year. Boating allowed on the Upper Chattooga would most certainly be considered low-impact by any standards.

However, should I happen to be faced with a "take it or leave it" position regarding this issue, I would place my vote on Proposal #6. Thank you very much for your time and any consideration given.

Sincerely,  
John Helms  
102 Wolf Ridge Ct.  
Hot Springs, AR 71913



<eojohnson@cox.net>

08/28/2007 08:57 PM

To: comments-southern-francismarion-sumter@fs.fed.us

cc:

Subject: Chattooga River Comments

Mr. John Cleeves  
U.S. Forest Service  
4931 Broad River Road  
Columbia, SC 29212  
comments-southern-francismarionsumter@fs.fed.us

RE: Chattooga Scoping Document

Dear Mr. Cleeves,

The alternatives currently proposed by the USFS require substantial amendment because they are not supported by or tied to actual capacity data, are not consistent with the USFS's appeal decision governing this process, are not consistent with applicable law, and will not protect the Chattooga River. The USFS's own capacity study demonstrated that boating is an appropriate use of the Upper Chattooga River, yet 5 of your 6 proposed alternatives ban boating on some or all of the upper river. The Upper Chattooga's capacity to support whitewater boating is not zero, and all action alternatives must allow at least some boating on the entire river. Any alternatives that limit recreation must do so based on the capacity of the river corridor as determined by real data - and must do so equitably.

In addition, the proposed alternatives should be amended as follows:

- Proposed use limits must be tied to a specific standard regarding user capacity. Only one USFS alternative even mentions a standard (Alternative #2).
- Limits must be applied equitably and fairly- not targeted to any specific user groups without significant evidence. All USFS alternatives single out boating for harsh limits and bans - for which there is no evidence.
- Limits should only be imposed when standards are met or exceeded - and not before. Five of the six USFS alternatives limit and/or ban boating immediately without basis.
- Alternatives must include a range of standards for all users. USFS alternatives address a range of arbitrary limits on boaters - but only one alternative would limit other users. For example, a standard of 10, 6, and 2 group encounters per day should be analyzed, as well as provisions that exclude the outlier days when high use can be expected or occurs randomly.
- Alternatives must be based on a capacity for all users and/or individual uses. The proposed USFS alternatives are not based on the social or physical capacity of the river corridor.
- Alternatives must prescribe indirect limits prior to direct limits as is required by USFS policy. Five of the six alternatives implement direct limits (i.e., bans) prior to trying indirect limits first in direct violation of USFS policy.
- Alternatives, including any capacity triggers, should distinguish between high use frontcountry areas and low use backcountry areas. USFS alternatives make no distinction between how many encounters with other users are acceptable in a campground or at a trailhead as opposed to on a trail or river deep in the woods.
- Alternatives should look at varying levels of user created trail closures, user created trail hardening, creation of new trails, campsite closures or relocations, fish stocking, parking, total recreational use, angling use, hiking use, camping use, boating use, and swimming use.

Thank you for considering these ideas.

Sincerely,  
Eric Johnson  
3610 Colony Rd.  
Fairfax, VA 22030



"Risa Shimoda"  
<risa@theshimodagroup  
.com>

08/29/2007 07:48 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: Chattooga Comments - Resent 8-29-07

August 27, 2007

Mr. John Cleeves  
U.S. Forest Service  
4931 Broad River Road  
Columbia, SC 29212

RE: Chattooga Scoping Document

Dear Mr. Cleeves,

The Chattooga is a pretty special place for me. I have been kayaking since 1979 when, from my home in Cincinnati, Ohio spent my earliest long distance trips on the Chattooga, Tellico, Chauga and Ocoee Rivers. The Chattooga, celebrated both as a recently-designated (1974) Wild and Scenic River and notorious as the backdrop for Deliverance was, provided exquisite inspiration for beginners as well as experts. It represented a wildly successful partnership between users and resources managers. In 1984 I moved to live in Atlanta, Denver, NC (north of Charlotte) and (Easley, SC) until 2001. During that period I had an opportunity to paddle both the rivers in this area and five other continents: the Chattooga stands tall among the well-used rivers around the world, providing a premium experience despite its high demand. In early 1986, as the President of the Piedmont Paddlers Club and in conjunction with the Atlanta Whitewater Club, I co-produced The Chattooga River Symposium at Clemson University to discuss the pressure on commercial use and the interest in limiting private group use of Sections II-IV.

I have been an avid volunteer for American Whitewater and twice it's Executive Director, most recently from 2001-2004. At that point I had attended meetings (as a volunteer) regarding Upper Chattooga recreational access, and AW had just recently submitted a recommendation that included seasonal access to the reaches above Highway 28. I am now removed from diligent efforts on the part of the local stakeholders to identify alternatives for the future recreational user template on this important river, and only weigh in as a visitor and fervent believer in reasonableness.

The alternatives proposed by the USFS and distributed for public comment August 14, 2007 seem founded on an interest to maintain status quo where possible, accommodating minimum net extra effort to quell the noise of squeaky wheels.

Granted, it is indeed monumentally challenging to meet the needs of enthusiasts who collectively might threaten the health of the forest and river corridor. It seems, however, that usage limits and statements of capacity must be either based on usage data or be open to testing, monitoring and adjustment.

The only Alternative that is remotely reasonable is Alternative #6, which is the only one of those offered that allows boating above the Highway 28 Bridge. This attribute should be present in each alternative, to allow focus on other uses which each portend more impact and affect on the wilderness quality of the river corridor.

I suggest the following, for [your](#) consideration:

- Boating bans in five of six alternatives emasculates the first five, from the perspective of the boating community. If you want to present a graduated set of options (from more to less control/less to more opportunity for recreation), modify this parochial tactic of throwing boaters a bone at the end. This is relatively insulting, and will have limited reasonable consideration of the other combined aspects of the Alternatives 1-5.
- Cite standards that have provided the basis for capacity limits. These sounds like they have been pulled out of someone's hat, and therefore groundless.
- Apply limits fairly so that they can pass a reasonableness test, or will likely be difficult or cumbersome to manage.
- In the discussion of capacity triggers or limits:
  - 1) Distinguish between high use front country areas and low use backcountry areas and
  - 2) Recognize seasonality (e.g., in 1986, our peace prize was recognizing heavy commercial days, initiating the promotion of off-peak private usage, where possible)
- Factor true consumption into the construction of capacity algorithms. Alternatives should look focus most on consumptive recreational impacts: user-created trail closures and trail hardening; creation of new trails; campsite 'capacity' related to closures or relocations; fish stocking and the bank 'traffic' thereby artificially created; parking.
- Create a capacity model, into which you consider the river's true spectrum of use: angling, hiking, camping, boating, and swimming.

Thank you for consideration. I would be happy to clarify any of these points or discuss in further detail.

Sincerely,

*risa shimoda*

601 Hudson Ave #102  
Takoma Park, MD 20912



"Quick, Sam"  
<Sam.Quick@ttigroupna  
.com>

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject:

08/29/2007 02:05 PM

I have visited the upper Chattooga (above Hwy 28) area many times. Better access to the area would be of benefit to all but I do have concerns about opening up the river to boating of any kind. Kayaks, canoes, and the like would interfere with trout fishermen. If all of the lower river is open to kayaks I think it would be appropriate to limit the upper river to the existing uses. My preference would be to keep the area above Hwy 28 closed to boating

Sam Quick

Techtronic Industries NA, Inc.  
One World Technologies NA, Inc.  
225 Pumpkintown Hwy  
PO Box 35  
Pickens SC 29671  
864-878-6331 x4076

“CONFIDENTIALITY: This e-mail and any attachments are confidential and may also be privileged. If you are not the named recipient, please notify the sender immediately and do not disclose the contents to another person, use it for any purpose, or store or copy the information in any medium.”



Robert Moore  
<meandsugaree@yahoo  
.com>

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject:

08/29/2007 05:28 PM

To Whom It May Concern:

I am a South Carolina native, a fisherman and a whitewater kayaker. I have been to meeting in Highlands and witnessed first hand the audacity of upper Chatooga fishermen and hikers, many with no native ties, who think that they own this river. This claim is supported by a law that exist on no other river in the United States of America.

I feel that public property such as the Chatooga River should be open to the non-motorized public. There is no reason that all recreational users could not coexist on the river at the same time. Typical advantageous kayaking conditions are generally not good for hiking and fishing. This means a significant reduction in shared usage up front. The rest of the incounters can be handled in a mature and respectful manor by all parties. There could be literature posted about being courteous at the trailheads and parking lots.

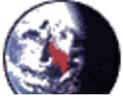
The Chatooga River is public property and the public is expected to interact in a socialy acceptable way. These two facts should be respected and the our right to kayak the Upper Chatooga should be upheld. I have never broken the law and kayaked this stretch of river, I pray that you legalize kayaking on the Upper Chatooga.

Thank you for your time,

Robert H Moore III

---

Looking for a deal? [Find great prices on flights and hotels](#) with Yahoo! FareChase.



Eric Arons  
<ericarons@gmail.com>

08/29/2007 07:17 PM

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject: Chatooga Boating

Dear Mr. Cleeves,

The alternatives currently proposed by the USFS require substantial amendment because they are not supported by or tied to actual capacity data, are not consistent with the USFS's appeal decision governing this process, are not consistent with applicable law, and will not protect the Chattooga River. The USFS's own capacity study demonstrated that boating is an appropriate use of the Upper Chattooga River, yet 5 of your 6 proposed alternatives ban boating on some or all of the upper river. The Upper Chattooga's capacity to support whitewater boating is not zero, and all action alternatives must allow at least some boating on the entire river. Any alternatives that limit recreation must do so based on the capacity of the river corridor as determined by real data – and must do so equitably.

In addition, the proposed alternatives should be amended as follows:

- Proposed use limits must be tied to a specific standard regarding user capacity. Only one USFS alternative even mentions a standard (Alternative #2).
- Limits must be applied equitably and fairly – not targeted to any specific user groups without significant evidence. All USFS alternatives single out boating for harsh limits and bans – for which there is no evidence.
- Limits should only be imposed when standards are met or exceeded – and not before. Five of the six USFS alternatives limit and/or ban boating immediately without basis.
- Alternatives must include a range of standards for all users. USFS alternatives address a range of arbitrary limits on boaters – but only one alternative would limit other users. For example, a standard of 10, 6, and 2 group encounters per day should be analyzed, as well as provisions that exclude the outlier days when high use can be expected or occurs randomly.
- Alternatives must be based on a capacity for all users and/or individual uses. The proposed USFS alternatives are not based on the social or physical capacity of the river corridor.
- Alternatives must prescribe indirect limits prior to direct limits as is required by USFS policy. Five of the six alternatives implement direct limits (i.e., bans) prior to trying indirect limits first in direct violation of USFS policy.
- Alternatives, including any capacity triggers, should distinguish between high use frontcountry areas and low use backcountry areas. USFS alternatives make no distinction between how many encounters with other users are acceptable in a campground or at a trailhead as opposed to on a trail or river deep in the woods.
- Alternatives should look at varying levels of user created trail closures, user created trail hardening, creation of new trails, campsite closures or relocations, fish stocking, parking, total recreational use, angling use, hiking use, camping use, boating use, and swimming use.

Thank you for considering these ideas.

Sincerely,

Eric Arons  
49 Dorland St. #2  
San Francisco, CA 94110



"Lea Richmond Jr"  
<learichmond@alltel.net  
>

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: the upper Chattooga

08/30/2007 07:19 AM

Any alternative that allows a vehicle of any sort ( a boat is a vehicle) in the area of the Chattooga above the 28 bridge will open the door for other means of transportation. I am 84 years old and still able to hike in; however, soon the time will come when some means of transport will be needed if I am to enjoy this portion of the river. I do not think it is just to allow able bodied folks to enter the area in one type of transport and lock the roads off for those who need assist. That said, I am opposed to any vehicles transporting more people into this portion of the river. I will cherish my memories and be happy knowing that this precious and fragile portion of forest will continue to be pristine, quiet and undisturbed except for the soft tread of those willing and able to walk in. Those who petition to inter with other means of transport claim to be excluded. They are welcome it's just their vehicles that are not.

Lea Richmond MD



**Mail2edale@aol.com**

08/30/2007 09:31 AM

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject: Comments on Chattooga River Project Alternatives

Attached please find subject.



Get a sneak peek of the all-new [AOL.com](http://AOL.com). COMMENTS ON NEPA PROCESS ALTERNATIVES.doc

Alternative 5: Boating allowed on a different section of the upper Chattooga River plus enhanced social and biophysical management. This alternative is similar to Alternative 4 except for a different section.

Alternative 6: Boating allowed on all sections of upper Chattooga River plus enhanced social and biophysical management. This alternative is similar to Alternative 4 except for different sections.

Summary: Alternative 1 is required by NEPA offering no change in current management; Alternative 2 offers social management and no boating; Alternative 3 offers resources management and no boating; Alternative 4 offers limited boating and enhanced social and resources management; Alternative 5 offers limited boating and enhanced social and resources management; Alternative 6 offers unrestricted boating on the upper river and enhanced social and resources management. Alternatives 4-6 differ primarily in where boating would be allowed on the upper Chattooga River, and include social and resources management.

In consideration of all Alternatives it seems that all Alternatives would provide the same excellent social and biophysical management actions. However, implementation of these actions is dependent on these actions receiving appropriate future funding. Alternatives 1-3 preserve and enhance the original land management objectives for which these lands, in general, and The Ellicott Wilderness and the Chattooga Wild and Scenic River Acts, specifically, were promulgated.

Further, I suggest Alternatives 2 and 3 be combined as good visitor and land and resources management and be incorporated into all Alternatives, except Alternative 1. This leaves 5 alternatives requiring effects analysis, two with no boating, three with boating. The required effects analyses of all alternatives will add to the data base for subsequent selection of a management alternative. Until that time there is absolutely no rational, or legal, basis for a decision.

Additionally, there is no compelling evidence to indicate that allowing boating as described in Alternatives 4-6 on these sections of the upper Chattooga River would enhance the "wild" values currently extant there. In fact, if one examines the lower portion of the Chattooga River where boating is allowed both social and biophysical standards have deteriorated over the past thirty-one years of management.

Is the problem on the lower Chattooga River that of the presence of boaters, or is it lack of agency funding and personnel to meet the overwhelming numbers of recreationists who come to the lower river? While an answer to this question is not needed at this time, it is patently suggestive that adding another recreation group to the upper river corridor would, most likely, result in a similar degradation of resource and recreation values within an all too short period of time. Once degraded, rehabilitation of the upper river to its current wilderness/wild state would become extremely difficult and expensive.

Edwin Dale  
561 Lakeland Ct  
Athens, GA 30607-2097  
[Mail2edale@aol.com](mailto:Mail2edale@aol.com)

## COMMENTS ON NEPA PROCESS ALTERNATIVES

Before making specific comments on the Alternatives developed by the Sumter National Forest (SNF) Interdisciplinary Team (IDT) for the upper Chattooga River project I wish to make a few comments on the overall process used by this IDT in their consideration of the proposed action to open the Upper Chattooga River to boating, an action initiated from the Washington Office in response to American Whitewater's complaint about restriction of boating on this section of the Chattooga River.

Even though the IDT departed from both the traditional technocratic planning method and the transactive planning process (LAC) it has, in their conglomeration, accomplished basic process steps in arriving at the description of alternatives as prescribed for NEPA planning documents. Also, the IDT has now defined desired future conditions for the area. From the ICOs and input from public meetings six alternatives for future management of the project area have been developed.

In these six alternatives boating is proposed in three and no boating allowed proposed in three of them. Once past the boating issue the remainder of the alternative management details center on management of recreationists **and** enhancing and upgrading efforts for resources (biophysical) protection in the project area. I view both of these considerations as positive in management of the upper Chattooga River.

Addressing the proposed Alternatives specifically, I offer the following brief comments.

Alternative 1: Maintain current management. This Alternative is required by NEPA. Selection of this alternative would mean no boating above the Highway 28 Bridge. The remainder of the proposed actions would address recreation management and resources protection.

Alternative 2: Social management. This Alternative is oriented toward management of recreationists and limiting additional environmental degradation in the absence of boating. The concept of self-registration for all visitors/users is introduced. It might be questioned if this process is ever successful, accurate and of value as a management tool.

Alternative 3: Biophysical management and resources protection. Why this alternative, like Alternative 2 above, is different from any other mandated and traditional Forest Service activity is beyond me. Alternatives 2 and 3 are not really different alternatives for land and water use. They are, in fact, both methods of good resources stewardship and should be employed as routine management of public lands. They are not alternatives to the proposed action that set in motion this overall study of boating on the upper Chattooga River.

Alternative 4: Social and resources management coupled with allowing boating on the upper Chattooga River is based on a defined and limited area, seasonal restrictions, group sizes and self-registration. This alternative introduces a new user group into the project area. Limited woody debris removal is permitted. Note: limited is not defined. Unregulated removal of woody debris is not to be treated lightly, as (its) presence is crucial to ecosystem enhancement in "wild" streams, creeks and rivers and should not be removed except to meet conditions stated in the Sumter NF Land and Resources Management Plan.



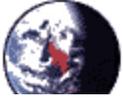
**"Skip Foley"**  
<skip@dixianasteel.com  
>

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: Upper Chattooga management options

08/30/2007 11:37 AM

As a user of the upper Chattooga watershed since the 50's I would like to support option 1 of the management options under consideration.

Thank You,  
Skip Foley



"Offenkrantz, Frederick"  
<foffenkrantz@mt.gov>

08/30/2007 03:36 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: Chattooga Scoping Document

Dear Mr. Cleaves,

The alternatives currently proposed by the USFS require substantial amendment because they are not supported by or tied to actual capacity data, are not consistent with the USFS's appeal decision governing this process, are not consistent with applicable law, and will not protect the Chattooga River. The USFS's own capacity study demonstrated that boating is an appropriate use of the Upper Chattooga River, yet 5 of your 6 proposed alternatives ban boating on some or all of the upper river. The Upper Chattooga's capacity to support whitewater boating is not zero, and all action alternatives must allow at least some boating on the entire river. Any alternatives that limit recreation must do so based on the capacity of the river corridor as determined by real data – and must do so equitably.

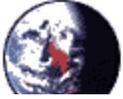
In addition, the proposed alternatives should be amended as follows:

- Proposed use limits must be tied to a specific standard regarding user capacity. Only one USFS alternative even mentions a standard (Alternative #2).
- Limits must be applied equitably and fairly– not targeted to *any* specific user groups without significant evidence. All USFS alternatives single out boating for harsh limits and bans – for which there is no evidence.
- Limits should only be imposed when standards are met or exceeded – and not before. Five of the six USFS alternatives limit and/or ban boating immediately without basis.
- Alternatives must include a range of standards for *all users*. USFS alternatives address a range of arbitrary limits on boaters – but only one alternative would limit other users. For example, a standard of 10, 6, and 2 group encounters per day should be analyzed, as well as provisions that exclude the outlier days when high use can be expected or occurs randomly.
- Alternatives must be based on a capacity for all users and/or individual uses. The proposed USFS alternatives are not based on the social or physical capacity of the river corridor.
- Alternatives must prescribe indirect limits prior to direct limits as is required by USFS policy. Five of the six alternatives implement direct limits (i.e., bans) prior to trying indirect limits first in direct violation of USFS policy.
- Alternatives, including any capacity triggers, should distinguish between high use frontcountry areas and low use backcountry areas. USFS alternatives make no distinction between how many encounters with other users are acceptable in a campground or at a trailhead as opposed to on a trail or river deep in the woods.
- Alternatives should look at varying levels of user created trail closures, user created trail hardening, creation of new trails, campsite closures or relocations, fish stocking, parking, total recreational use, angling use, hiking use, camping use, boating use, and swimming use.

Thank you for considering these ideas.

Sincerely,

Fred Offenkrantz  
Water Resources Specialist  
Department of Natural Resources and Conservation  
910 Helena Avenue  
Helena, MT 59620  
406-444-0497  
foffenkrantz@mt.gov

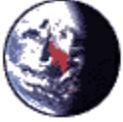


"jim" <jrd2@alltel.net>  
08/30/2007 10:47 PM  
Please respond to "jim"

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: upper chattoga

I think boating should be restricted to be below 28 bridge.

jim darnell  
[jrd2@alltel.net](mailto:jrd2@alltel.net)



"Robert Maxwell"  
<rangerrob2000@hotmail.com>

08/31/2007 12:14 AM

To: comments-southern-francismarion-sumter@fs.fed.us  
cc: dkinser@ediltd.com, milt@net2atlanta.com  
Subject: Chattooga Headwaters Management Plan Comment

Mr. John Cleeves  
Francis Marion & Sumter National Forests  
4931 Broad River Road  
Columbia, SC 29212-3530

Dear Sir,

I would like to comment on the recently released management plans for the headwaters of the Chattooga River. I, begrudgingly, am in favor of plan #6.

Why do I say "begrudgingly"? The plans you have laid out seem to completely rely on feedback from the "Chattooga, July 14th Workshop" in Walhalla SC, and little else. It seems that whichever group packed the meeting with the most supporters dictated the content of your "management plan options." There doesn't seem to be any option based on previous public comments or the boating study.

Options 4-6, where boating is allowed but restricted, seem purely arbitrary. Not based on the science from the boating study above highway 28. If there is an option to restrict and "zone" the boaters, why isn't there an option to restrict and "zone" the other users? Boating the headwaters would have significantly less environmental impact than the current groups allowed in the wilderness area. Yet boating is heavily restricted or denied in all but one option. This isn't only unfair, it's illegal.

Nothing seems to be included from previous meetings or public input periods. There have been plenty of concerns about restricting overall access with limited parking, closing roads and bridges, stopping the stocking of non-native aquatic species in the river etc... yet, these issues have not been addressed.

There is absolutely no option that combines both fishing interests AND boating interests. As if they can't coexist. They are not mutually exclusive. An option that would unite both groups would obviously benefit the future protection of the upper Chattooga. Why have you divided the two groups in different management options instead of uniting them??

The management plan I would like to see for the Chattooga headwaters would legalize boating above highway 28 with no more restrictions than are imposed on other user groups. Permit and reasonably limit all user groups, to limit encounters and collect hard data for tweaking the management plan in the future. Only allow woody debris removal in rapids where it might endanger the life of a boater. Stop the stocking of non-native aquatic species. Close all but Forest Service sanctioned trails. Restrict camping areas. Rehabilitate trampled areas. Move the Burrels Ford parking area at least ½ mile away from the bridge. In short, let the Upper Chattooga become a more remote wilderness experience without denying any environmentally friendly user group the opportunity to enjoy the area.

The final management plan decision should not be left up to whichever user group can stuff the ballot box. Without a reasonable management option that addresses all user groups fairly instead of dividing them between management options I feel the Forest Service has failed in its task. You need to

reconsider the final management plan for the headwaters of the Chattooga, set your bias against boating aside and come up with a plan that is fair and equitable for ALL user groups AND protects the Chattooga for the future.

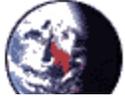
I would rather see all roads, trails, and bridges closed, and ban all human activity in the Upper Chattooga then see one environmentally friendly user group denied access.

Sincerely,

Robert Maxwell  
4677 Andover Court  
Atlanta, GA 30360  
770/936-8238

---

Puzzles, trivia teasers, word scrambles and more. Play for your chance to win! [http://club.live.com/home.aspx?icid=CLUB\\_hotmailtextlink](http://club.live.com/home.aspx?icid=CLUB_hotmailtextlink)



"Carl Keaney"  
<carl@hwimail.com>  
08/31/2007 10:15 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: RE: headwaters of the Chattooga River access issues

Mr. John Cleaves  
Francis Marion & Sumter National Forests  
4931 Broad River Road  
Columbia, SC 29212-3530

RE: Recently released management plans for the headwaters of the Chattooga River

Dear Sir,

I am an avid user of public lands including National Forests. I'm also a kayaker, backpacker, camper, fisherman, etc.

If forced to choose from the options listed I would have to pick #6.

I do, however, think that it is erroneous for the Forest Service to have created options which heavily restrict boaters on the waterway for no apparent reason.

In the future all our public lands will be under pressure from use and development interests and it seems that the boating community should be seen as an important ally for the maintenance of the Forest Service and the public lands that it is chartered to manage.

We all need to work together as responsible, low-impact, wilderness users that strongly desire to see wilderness areas preserved for recreational activity into the indefinite future.

All users of the public lands share equally in the tax costs that make their maintenance possible. This shouldn't come down to a majority of opinion one way or the other. Part of our democratic way of life is the basic requirement of equality before the law. As boating can't be shown to impact the area in question to any detrimental extent there should be no discussion of any limitations on this activity.

I've boated small watershed creeks and streams all over the Southeast and never had any conflict with other users. I certainly haven't left anything behind and haven't taken anything other than fond memories either.

Thank you for your time and consideration of these comments.

Sincerely,

Carl Keaney  
3824 Maloney Road  
Knoxville, TN 37920



<benvc@charter.net>

08/31/2007 02:34 PM

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject:

Mr. John Cleeves  
U.S. Forest Service  
4931 Broad River Road  
Columbia, SC 29212  
comments-southern-francismarion-sumter@fs.fed.us

RE: Chattooga Scoping Document

Dear Sir,

I would like to comment on the recently released management plans for the headwaters of the Chattooga River. I, begrudgingly, am in favor of plan #6.

Why do I say "begrudgingly"? The plans you have laid out seem to completely rely on feedback from the "Chattooga, July 14th Workshop" in Walhalla SC, and little else. It seems that whichever group packed the meeting with the most supporters dictated the content of your "management plan options." There doesn't seem to be any option based on previous public comments or on the environmental studies.

Options 4-6, where boating is allowed but restricted, seem purely arbitrary. Not based on the science from the boating study above highway 28. If there is an option to restrict and "zone" the boaters, why isn't there an option to restrict and "zone" the other users? Boating the headwaters would have significantly less environmental impact than the current groups allowed in the wilderness area. Yet boating is heavily restricted or denied in all but one option. This isn't only unfair, it's illegal.

Nothing seems to be included from previous meetings or public input periods. There have been plenty of concerns about restricting overall access with limited parking, closing roads and bridges, stopping the stocking of non-native aquatic species in the river etc.... yet, these issues have not been addressed.

There is absolutely no option that combines both fishing interests AND boating interests. As if they can't coexist. They are not mutually exclusive. An option that would unite both groups would obviously benefit the future protection of the upper Chattooga. Why have you divided the two groups in different management options instead of uniting them??

The management plan I would like to see for the Chattooga headwaters would legalize boating above highway 28 with no more restrictions than are imposed on other user groups. Permit and reasonably limit all user groups, to limit encounters and collect hard data for tweaking the management plan in the future. Only allow woody debris removal in rapids where it might endanger the life of a boater. Stop the stocking of non-native aquatic species. Close all but Forest Service sanctioned trails. Restrict camping areas. Rehabilitate trampled areas. Move the Burrels Ford parking area at least ½ mile away from the bridge. In short, let the Upper Chattooga become a more remote wilderness experience without denying any environmentally friendly user group the opportunity to enjoy the area.

The final management plan decision should not be left up to whichever user group can stuff the ballot box. Without a reasonable management option that

addresses all user groups fairly instead of dividing them between management options I feel the Forest Service has failed in its task. You need to reconsider the final management plan for the headwaters of the Chattooga, set your bias against boating aside and come up with a plan that is fair and equitable for ALL user groups AND protects the Chattooga for the future.

I would rather see all roads, trails, and bridges closed, and ban all human activity in the Upper Chattooga then see one environmentally friendly user group denied access.

Sincerely,

Sincerely,

Ben VanCamp  
49 Johnston Blvd  
Asheville, NC 28806



Bo Scull  
<boscull1@comcast.net  
>

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject: Comments

08/31/2007 05:42 PM

Sirs:

After reading the letter on alternatives for managing recreation uses on the upper Chattooga River, the best I can say is that alternative #6 is the least objectionable. I am a retired engineer (PhD) and an avid whitewater kayaker, hiker and bicycler. I don't have a personal axe to grind since at my age I will probably never paddle the upper Chattooga. These proposals appear to be among the most egregious examples of bureaucratic micro-management to appease entrenched special interest groups I have ever seen. Where else in this country are such arbitrary restrictions placed on public use of public lands? Why are whitewater boaters alone singled out for restricted access?

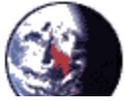
Regulations to protect the environment are laudable. Restrictions on camping and motorized access are understandable. However, among hiking, fishing, biking and whitewater boating, it should be obvious that non-motorized boating has the least environmental impact. Visit some of the most over-used(?) whitewater rivers in this country such as the Ocoee in Tennessee, the Arkansas in Colorado or the Clackamas in Oregon. Except for a few traces of color on some rocks, that wears away quickly, there is no evidence of whitewater boating, much less environmental damage. Though I am a hiker and mountain biker I have to admit that trail erosion is a problem in these activities and this probably applies to fishing trails also. It is not uncommon when boating on the Tellico in Tennessee to become temporarily entangled in line left by fishermen. However, the restrictions are applied only to whitewater boaters. I would be just as opposed to such arbitrary restrictions placed on fishermen, hikers, etc.

We all would like to enjoy public lands with a sense of solitude. I would love to hike without seeing any other trail users much like fishermen would prefer not to see boaters or other fishermen. However for me to hike, bike or boat in solitude, means I must deny this to others. I believe in inclusion and am willing to share our public lands. It appears that you define encounters only as meaning boaters disturbing fishermen. What about the reverse (though I have never heard of boaters complaining about fishermen, maybe we should)? What about hikers encountering fishermen or hikers encountering other hikers, etc. Restricting whitewater use to four groups a day is effectively denying most boaters the opportunity to paddle the upper Chattooga. To be fair and consistent you should also limit hiking and fishing to four groups per day. This smells suspiciously like power politics where you screw the smallest group that has the least clout.

Finally, why is boating adjacent to private property a consideration? Is protecting private property values a concern of the Forest Service? Do you plan to restrict hiking on land adjacent to private property also? Much of the Appalachian Trail is adjacent to private property. I live on a creek and I look forward to seeing canoeists enjoying it. None of my neighbors has ever suggested trying to prevent boating on the creek even if we could. In most states you can buy beach-front property, but you cannot exclude people from the beach or boating in sight of the beach. Again, these proposals seem to be an example of money and/or political clout.

H M Scull  
2912 Millstream Lane  
Knoxville, TN 37931

-  
-



"NWOC Mail New"  
<mail@nwoc.com>

08/31/2007 08:16 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject:

Mr. John Cleeves  
U.S. Forest Service  
4931 Broad River Road  
Columbia, SC 29212  
[comments-southern-francismarion-sumter@fs.fed.us](mailto:comments-southern-francismarion-sumter@fs.fed.us)

RE: Chattooga Scoping Document

Dear Mr. Cleeves,

The alternatives currently proposed by the USFS require substantial amendment because they are not supported by or tied to actual capacity data, are not consistent with the USFS's appeal decision governing this process, are not consistent with applicable law, and will not protect the Chattooga River. The USFS's own capacity study demonstrated that boating is an appropriate use of the Upper Chattooga River, yet 5 of your 6 proposed alternatives ban boating on some or all of the upper river. The Upper Chattooga's capacity to support whitewater boating is not zero, and all action alternatives must allow at least some boating on the entire river. Any alternatives that limit recreation must do so based on the capacity of the river corridor as determined by real data – and must do so equitably.

In addition, the proposed alternatives should be amended as follows:

- Proposed use limits must be tied to a specific standard regarding user capacity. Only one USFS alternative even mentions a standard (Alternative #2).
- Limits must be applied equitably and fairly – not targeted to *any* specific user groups without significant evidence. All USFS alternatives single out boating for harsh limits and bans – for which there is no evidence.
- Limits should only be imposed when standards are met or exceeded – and not before. Five of the six USFS alternatives limit and/or ban boating immediately without basis.
- Alternatives must include a range of standards for *all users*. USFS alternatives address a range of arbitrary limits on boaters – but only one alternative would limit other users. For example, a standard of 10, 6, and 2 group encounters per day should be analyzed, as well as provisions that exclude the outlier days when high use can be expected or occurs randomly.
- Alternatives must be based on a capacity for all users and/or individual uses. The proposed USFS alternatives are not based on the social or physical capacity of the river corridor.
- Alternatives must prescribe indirect limits prior to direct limits as is required by USFS policy. Five of the six alternatives implement direct limits (i.e., bans) prior to trying indirect limits first in direct violation of USFS policy.
- Alternatives, including any capacity triggers, should distinguish between high use

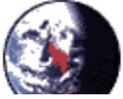
frontcountry areas and low use backcountry areas. USFS alternatives make no distinction between how many encounters with other users are acceptable in a campground or at a trailhead as opposed to on a trail or river deep in the woods.

- Alternatives should look at varying levels of user created trail closures, user created trail hardening, creation of new trails, campsite closures or relocations, fish stocking, parking, total recreational use, angling use, hiking use, camping use, boating use, and swimming use.

Thank you for considering these ideas.

Sincerely,

John C Meyer  
NW Outdoor Center  
2100 Westlake Ave N Ste1  
Seattle, WA 98109



"Eric Nies"  
<nies@runbox.com>  
09/01/2007 01:12 AM

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject: Chattooga headwaters: I support option #6

Mr. John Cleeves  
U.S. Forest Service  
4931 Broad River Road  
Columbia, SC 29212  
comments-southern-francismarion-sumter@fs.fed.us

RE: Chattooga Scoping Document

Dear Mr. Cleeves,

I support option #6. Your capacity study demonstrated that boating is an appropriate use of the Upper Chattooga River. Five of your 6 proposed alternatives ban boating on some or all of the upper river, yet as I understand it, there is no data to support this allocation pattern.

I acknowledge the weight of opinion of those who wish to exclude boaters from the corridor. Yet your own national guidelines mandate that boating is an appropriate wilderness activity, and that any alternatives that limit recreation within your jurisdiction must do so equitably, based on the capacity as determined by real data.

I know and love the Chattooga headwaters. I have been waiting to kayak them for 27 years, ever since I became a Chattooga river guide in 1981. I now live in New York state, but my ties to your area remain strong. I will be in attendance at the Sept 29 meeting.

Respectfully yours,  
Eric Nies MD



"Tom McInnis"  
<tomcatmc@bellsouth.net>

09/01/2007 11:20 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: Comments on alternatives for upper Chattooga management

Please see the attached document. A signed hard copy is enroute.

Tom McInnis, Chair  
SC Trout Unlimited



SC TU Scoping response.doc

adequately address our concerns regarding the biological, biophysical, social and esthetic impacts of allowing boating.

We look forward to the opportunity to refine the proposed alternatives so that the river will continue to be a unique resource for future generations.

Sincerely,

Tom McInnis, Chair  
South Carolina Council  
Trout Unlimited

Art Shick, State Representative  
National Leadership Council  
Trout Unlimited

and an unacceptable number of angler/boater encounters would ensue. This reach of the river is narrower and shallower in the upstream reaches, and is a preferred option to the lower reaches when water levels there are uncomfortable for anglers. This alternative would focus use by the two groups in a more limited area, to the detriment of both user groups. A much high water level cutoff for boating is needed to reduce encounters to an acceptable level.

- Intrusion into a region of wilderness that is not currently accessible by roads or trails. The USFS has not chosen to extend the current riverside trails from Ellicott Rock north or from Bull Pen Bridge south. This has created an undisturbed wildlife and plant sanctuary which would be disrupted by essentially creating a new trail (a water trail) through the heart of the area. This may in fact violate the principles of the Wilderness Act.
- Removal of woody debris in the river should be very limited, should be done by USFS personnel or with their supervision, and should not be done solely for recreational access. Recruitment of woody debris is the preferred condition.
- A maximum of 4 groups per day of 6 boaters each (24 boaters per day) is too high a number. Needs to be reduced.

Because of these concerns, we find this alternative unacceptable.

Alternative #6. This alternative allows unlimited boating throughout the upper Chattooga and offers mitigations for the impacts. This alternative is unacceptable because:

- It will cause a serious degradation in social values - large number of encounters, likely arguments between users, excessive traffic and crowding at access points, and displacement of current users. This is the same pattern that has occurred below the SC 28 bridge over the past 30 years, and should not be allowed to happen in the upper river;
- Negative biological impacts will result, including change in fish behavior resulting in poorer fishing experience, additional trampling of bank side vegetation at portage points, increased erosion and subsequent siltation to the detriment of fish and other aquatic life, and loss of nutrient input from large woody debris as result of removal by boaters;
- Will result in excessive degradation of biophysical features caused by portage trails, increased traffic at access points, increased erosion of banks, and removal of large woody debris;
- Will degrade the esthetic values, solitude, and tranquility of the river corridor. Small boat kayaking is an adventure sport, and by its very nature is at odds with the outstanding and remarkable values currently protected in the upper Chattooga.

In conclusion, we support Alternatives 1, 2 and 3, with some small reservations outlined above. We do not think that any of the 3 alternatives that allow boating (#'s 4, 5 and 6)

There are six alternatives presented. Here are our comments on them.

Alternative #1. This is the current management standard, and has been for 30+ years. We think has been successful in preserving the outstanding and remarkable values of the upper Chattooga. Some minor tweaking of the current management is probably needed in recognition of the heavy visitation some parts of the river receive, and to accommodate population growth in the region. However, we do not think there is any reason to make the extreme change of opening the upper river to boating, and have yet to hear a reasonable argument as to why the USFS should do so. We strongly support this alternative.

Alternative #2. This alternative is designed to manage social issues (encounters). It is essentially the same as Alternative #1 with added restrictions on current users. For the most part, we find this alternative acceptable. We do feel that removal of parking lots in the corridor is an extreme measure at the current level of use, and would eliminate many older citizens from using the river. Restricting the number of parking spaces and proper enforcement would probably be sufficient for the foreseeable future.

Alternative #3. This alternative would reduce erosion and damage to vegetation, and is in alignment with the “tweaking” to the current management suggested in our comments on Alternative #1. We would support this alternative.

Alternative #4. This alternative introduces boating on a limited reach of the river in North Carolina, and adds management prescriptions to mitigate the impacts of the new user group. As stated in the opening paragraph of this letter, we have yet to hear a compelling argument as to how introducing boating will benefit the biological, physical, esthetic and social aspects of the river. In fact, it would seem that adding a new user group that will intrude into areas of the corridor rarely visited by other users as well as adding traffic to heavily used areas would be detrimental to all of these aspects. We accept the fact that limiting boating to the winter months would minimize encounters with one user group (anglers) in this reach, and support that proposal. However, *in toto*, allowing boating would be a net loss for the river and current users, and we cannot accept this alternative.

Alternative # 5. This alternative allows boating on the uppermost half of the upper Chattooga, and proposes necessary mitigations. As stated above, we dismiss this alternative for the fact that boating would not contribute the biological, physical, esthetic or social values. We also have concerns with specific parts to the alternative, should the USFS select it as the preferred alternative.

- The proposed water level at which boating is allowed (2.3 ft. at the US 76 bridge) is much too low. At that level, the river is still very much accessible to anglers,



August 29, 2007

Mr. John Cleeves  
USDA Forest Service, Sumter National Forest  
4391 Broad River Road  
Columbia, South Carolina 29212-3530

RE: Upper Chattooga River Visitor Capacity Analysis Scoping Notice

Dear Mr. Cleeves:

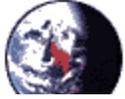
We are writing in response to the suggested alternatives for management of the upper Chattooga River released by the USFS on August 14, 2007. Trout Unlimited's mission is to conserve, protect, and restore North America's cold water fisheries and their watersheds. We feel that the management prescription for the Chattooga that the USFS will select will determine how successfully the upper Chattooga will align with TU's mission. We have reviewed the six alternatives and offer the following comments.

First, in the scoping letter there are four issues listed.

1. *Should there be new standards limiting trailheads, trails and/or campsites?* Yes. The proliferation of user-created trails and campsites will increase erosion and damage to trees and other vegetation. Many existing campsites violate the current policies regarding proximity to streams and trails. Enforcement is the key.
2. *Should there be new standards limiting group sizes, encounters between user groups and/or access?* Possibly. I believe there needs to be more data on numbers of users before major changes are made. A self-registration system would be one way to get accurate visitation data. The addition of boating would certainly require new standards (see Issue 4 below).
3. *Should there be new boating opportunities on the Chattooga River?* No. Boating is allowed on 2/3rds of the river currently. The negatives of opening the upper river to boating outweigh any benefits it would provide for additional recreational options. I am not aware of any compelling argument as to how increased boating will benefit the river and the wilderness.
4. *Should there be new standards limiting group sizes, encounters between user groups and/or access if new boating opportunities are allowed?* Yes. Allowing boating would introduce a new user group that will be more intrusive than those currently allowed. Boaters will cover more of the length of the river corridor than any other user group, increasing encounters, particularly with anglers and swimmers. Because the river is relatively narrow, avoidance of encounters will be impossible. Strict standards and enforcement will be necessary to reduce encounters, and to preserve the solitude and tranquility enjoyed by current users.

*America's Leading Coldwater Fisheries Conservation Organization*





"Missi Rust"  
<mrust6@gmail.com>  
09/01/2007 12:00 PM

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject: Please keep boats off the Chattooga North Fork

Please keep boats off the Chattooga North Fork

--

Cheers,  
Missi

\*\*\*\*\*

The impossible is often the untried.  
~Jim Goodwin

"I'd put my money on the sun and solar energy. What a source of power! I hope we don't have to wait 'til oil and coal run out before we tackle that." - Thomas Edison (1847-1931)



"Josh Leonard"  
<jleonard.chess@gmail.  
com>

09/01/2007 01:50 PM

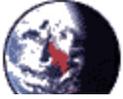
To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject: Chattooga River

John Cleeves,

Please keep boats off of the Chattooga North fork.

Thank you for your time and effort for the US Forests,

Josh Leonard  
306 Rainy Knobs  
Sapphire,NC  
28774



Tabitha  
<tabithar@gmail.com>

09/01/2007 03:17 PM

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject: Chattooga North Fork

**Please keep boats off the Chattooga North Fork.**



Phillip Lammonds  
<plammonds@yahoo.com>  
m>

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject:

09/01/2007 05:50 PM

PLEASE KEEP BOATS OFF THE CHATOOGA NORTH FORK

Phillip M. Lammonds  
Broker-in-Charge

Prince George Sotheby's International Realty

6500 Ocean Highway  
Pawleys Island, South Carolina 29585  
t. 843.237.7711 f. 843.237.7788 c. 843.240.1943

NOTICE: This e-mail and all attachments transmitted with it are intended solely for the use of the addressee and may contain legally privileged and confidential information. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, copying, or other use of this message or its attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately by replying to this message and please delete it from your computer.

---

Moody friends. Drama queens. Your life? Nope! - their life, your story. Play Sims Stories at Yahoo! Games.  
<http://sims.yahoo.com/>



Phillip Lammonds  
<plammonds@yahoo.com>  
m>

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject:

09/01/2007 05:50 PM

PLEASE KEEP BOATS OFF THE CHATOOGA NORTH FORK.

Phillip M. Lammonds  
Broker-in-Charge

Prince George Sotheby's International Realty

6500 Ocean Highway  
Pawleys Island, South Carolina 29585  
t. 843.237.7711 f. 843.237.7788 c. 843.240.1943

NOTICE: This e-mail and all attachments transmitted with it are intended solely for the use of the addressee and may contain legally privileged and confidential information. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, copying, or other use of this message or its attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately by replying to this message and please delete it from your computer.

---

Take the Internet to Go: Yahoo!Go puts the Internet in your pocket: mail, news, photos & more.  
<http://mobile.yahoo.com/go?refer=1GNXIC>



"Mike"  
<mike@tupelotoys.com  
>

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: Alternative streams

09/01/2007 09:27 PM



Please add to the public record, this was never included. Alternative Creeks in the area.pdf

## Alternative Local Streams Offer Sufficient Whitewater

The U.S. Forest Service has an opportunity to insure that the last protected stream in southern Appalachia does not join the pervasive monoculture of kayaking that has been methodically seizing control of every creek. The Chattooga headwaters have been a bastion for those backcountry enthusiasts seeking an alternative to those heavily boated Mountain creeks.

It took forty years for forest managers to realize the need to zone wilderness areas from the growth in motor boating and automobiles; this happened with the Wilderness Act in 1964. Prior to 1964, motor vehicles were slowly diminishing National Forest experiences for the backcountry users and diminishing the solitude sought after by many visitors. Like the pervasive motorized vehicles, the easier access resulting from kayaking again threatens the pursuits of backcountry enthusiast and the wilderness itself. Creek boating is considered an intrusive activity for the backcountry angler, wildlife viewer or hiker<sup>1</sup>; Encounters would result in a diminished wilderness experience for these other visitors. Like mountain biking on land trails, it is time the USFS acknowledges and correctly classifies the differences between creekers and other river users.

The 2003 Chattooga study published by American Rivers and the National Park service polled visitors on the lower Chattooga (below Hwy 28). Visitors were asked what they (95% boaters) would do if the lower Chattooga was not available that day. Ninety-five percent of the respondents had alternative places to kayak or other activities, only five percent of the polled would have “stayed home. This study did not include the upper Chattooga, which only would offer more opportunity for boating. The USFS already considers the Chattooga as “nationally recognized white-water” resource<sup>2</sup> without the addition of the headwaters.

There are many alternative floatable streams to the headwaters within a short drive from the Chattooga. Choices for Kayaking, or Creeking, is well established in the area with many other streams. The AW demanding to have the only protected public stream open to boating appears gluttonous. The USFS needs to protect the quickly fading alternative experience for all non-boating visitors.

The Chattooga River abuts Rabun County in Georgia and Oconee County in South Carolina. American Whitewater (AW) lists 132 runs in GA with 18 of them in Rabun County (see Appendix A). AW lists 92 runs in SC with 18 runs in Oconee County (see Appendix B).

In North Carolina the Chattooga is bordered by Macon County, Jackson County and is within a mile of Transylvania County. To minimize the AW list of 203 boatable NC runs we have listed 24 published runs of class III and above within a 50-mile radius of the Chattooga WSR. These runs are listed in Appendix C.

These alternative boating runs and creeks are some of the most cherished whitewater runs in the entire US. Many boaters already consider the Chattooga watershed a whitewater Mecca. Boaters' praise for these currently available whitewater runs are listed below.

1. **Chattooga Section III** “Imagine a place so breathtakingly beautiful that you would give up a day of paddling just to visit it. Now imagine that place with the best class III white water river in the southeast running through it.” “unspoiled” pg.88. *North Carolina Rivers and Creeks*, Davis, 2005 Brushy Mtn. Publishing.

“stunningly beautiful scenery and challenging whitewater” pg 61 *The Chattooga Wild and Scenic River*, Boyd 1998 Fern Creek Press.

2. **Chattooga Section IV**: “there is no feeling that compares to the increase of a paddlers heart rate when first passing under the 76 bridge and into the mysteries that await on this fabled section of the worlds most beautiful whitewater rivers.” pg.90. *North Carolina Rivers and Creeks*, Davis, 2005 Brushy Mountain. Publishing.

“If thundering whitewater is your goal, then section IV of the Chattooga is a close to heaven as you can come. Imposing sheer cliffs and splashing waterfalls enhance this wilderness experience setting, creating a magnificent destination for boaters. “Section IV is known around the world as one of the most beautiful exciting and challenging whitewater runs anywhere.” Pg 81 *The Chattooga Wild and Scenic River*, Boyd 1998 Fern Creek Press.

3. **Overflow Creek [AKA The Chattooga West Fork]**: “This super classic Chattooga tributary boasts incredible scenery, excellent but manageable class V drops and one of the richest histories of any southeastern creek.” After 30 years “overflow remains one of the best [creek] runs in the south.” pg.90. *North Carolina Rivers and Creeks*, Davis, 2005 Brushy Mountain. Publishing.

“A classic southern creek run...extremely beautiful” “The steep gradients are typical of southern creek runs” *Southern Fried Creeking*, Wayne Gentry 1992, Gentry video productions

An Overflow trip can be extended by continuing down the West fork to the lower Chattooga



<sup>1</sup> Sumter USFS “desired conditions” meting notes posted December 17 2005

<sup>2</sup> 2004 Sumter FS RMLP pg 3-9

The ability to run most of these listed creeks is highly dependent on rain fall; Most creeks, like the upper Chattooga, needing a significant storm system to render the creek “runable” by kayaks. Since the rainfall needed would be significant weather systems, all listed creeks would generally be available for floating simultaneously with the Chattooga Headwaters. Since these other public streams permit boating , all recreational opportunities for boating averse activities is consequently lost to kayaking during high-water times.

There are numerous floatable streams in Southern Appalachian; each with their own unique rapids, runs and scenery. What the foothills area is lacking is an

alternative to these boat-filled streams during high-water days. Without managing the resources for diversity, advancements in kayaking will eventually encompass every drop of moving water. The slow displacement of other activities with the boating growth is visible on the lower Chattooga and the Nantahala, therefore continuation of the current protective restrictions is essential. The Upper Chattooga is the only local river that has both Wilderness and Wild & Scenic protective status; It also provides the last opportunity for the Sumter Forest Service to offer an alternative experience for visitors and wildlife that are less tolerant of boating.



**50 Radius from Ellicott Rock**

## Appendix A: Rabun County, GA

No.	Name	Description	Class of Whitewater
1.	Big Creek -	<u>Highway 28 to Overflow Creek</u>	IV-V(V+)
2.	Chattooga -	<u>Section 3 - Earls Ford to Route 76 Bridge</u>	II-III+(IV)
3.	Chattooga	<u>Section 4 - Route 76 Bridge to Tugaloo Lake Boat Ramp</u>	II-IV+(V)
4.	Coleman -	<u>Coleman River Rd to Tallulah River</u>	V
5.	Darnell Creek	<u>Roadside along Darnell Creek Rd.</u>	III+(V+)
6.	Holcombe Crk	<u>FS Road 86B bridge to Three Forks of W.Fork Chattooga</u>	IV-V+
7.	Moccasin Crk	<u>W. Wildcat Rd to Lake Burton</u>	III-IV(V+)
8.	Overflow Crk	<u>USFS Road 86B to Overflow Creek Road Bridge</u>	IV-V(V+)
9.	Stekoa Creek	<u>1- Upper: Highway 23 to Rickman Airfield Road</u>	V
10.	Stekoa Creek	<u>2- Timber Bluff Road off US Route 76 to Chattooga River</u>	III-V
11.	Tallulah -	<u>1 - GA/NC State Line to Tate Branch Campground</u>	I-II(III)
12.	Tallulah -	<u>2 - Tate Branch Campground to Coleman River</u>	V
13.	Tallulah -	<u>3 - Coleman River Junction to Lake Burton</u>	II-III+
14.	Tallulah -	<u>4 - Middle - Old Hwy 441 to Tallulah Falls Lake</u>	II-III
15.	Tallulah -	<u>5 - Tallulah Gorge to Lake Tugaloo</u>	IV-V
16.	Tiger Creek -	<u>Lakemont to Tallulah River</u>	III
17.	Warwoman Creek	<u>Earl's Ford Road to Chattooga River</u>	II-III
18.	Wildcat Creek -	<u>W. Wildcat Rd. (Falls)</u>	II(IV)

Source of boatable creeks: <http://www.americanwhitewater.org/rivers/state/GA/>

## Appendix B : Oconee County, SC

1.	Brasstown Creek -	<u>Brasstown Road to Yonah Lake</u>	V
2.	Cedar Creek -	<u>Blue Hole Falls to Cobbs Bridge Rd. (Chauga River)</u>	IV-V
3.	Chattooga River -	<u>Section 2 – Highway 28 Putin to Earl's Ford</u>	II
4.	Chattooga River –	<u>Section 3 - Earls Ford to Route 76 Bridge</u>	II-III+(IV)
5.	Chattooga River -	<u>Section 4 - Route 76 Bridge to Tugaloo Lake Boat Ramp</u>	II-IV+(V)
6.	Chattooga East Fork	<u>1: Hwy 107 to Walhalla Fish Hatchery</u>	IV
7.	Chauga River -	<u>1: Verner Mill Rd. to Blackwell Bridge</u>	II-III (IV)
8.	Chauga River -	<u>2: Route 193 to Route 290/Cassidy Bridge</u>	II-III (V)
9.	Chauga River -	<u>3: Route 290 /Cassidy Bridge Rd. to Cobbs Bridge Rd.</u>	IV
10.	Chauga River -	<u>4: Cobbs Bridge Rd. to N. Horseshoe Bridge Rd.</u>	I-II(III)
11.	Coneross Creek -	<u>SC 59 to Coneross Hydro Plant Park</u>	I II III
12.	Flat Shoal River -	<u>1: Hwy 11 to Flat Shoals Bridge</u>	I-III(IV)
13.	Flat Shoal River -	<u>2: Flat Shoals Bridge to Tanyard Bridge (SSR 37-24)</u>	I-III
14.	Flat Shoal River -	<u>3: Tanyard Bridge to Stamp Creek Access</u>	II
15.	Little River NF	<u>Highway 11 to Tanyard Bridge (SSR 37-24)</u>	I-III
16.	Oconee Creek -	<u>Hwy 11 to Little River</u>	II-III
17.	Snow Creek -	<u>Snow Creek Rd. to Lake Hartwell</u>	I-III
18.	Whetstone Creek -	<u>Sandy Ford Access Road to Sandy Ford</u>	II-III (V)

Source of boatable creeks: <http://www.americanwhitewater.org/rivers/state/SC/>

## Appendix C

### North Carolina Runs within 50 miles of the Chattooga river.

Distance from Chattooga	Name	Description	class
45	Big Hungry Creek	<u>Big Hungry Road to Green</u>	III-IV
25	Courthouse Creek	fall to 215	IV/V
15	Cullasaja	<u>Lake Sequoyah to Peeks Creek Bridge</u>	IV-V(V+)
30	Davidson	<u>1. Forest Service Road 475-A to Looking Glass Creek</u>	III+(IV)
20	Eastatoe		IV+
35	French Broad	<u>9. Barnard to Hot Springs</u>	III-IV
30	French Broad, East Fork	<u>East Fork Road at Laurel Branch to French Broad River</u>	II-IV
25	French Broad, N Fork	<u>Route 1326 Bridge to US Route 64 Bridge</u>	III-IV
30	French Broad, W Fork	<u>SR 1309 Bridge to US 64 Bridge</u>	IV-V
50	Green	<u>Narrows of the Green</u>	IV-V+
50	Green	<u>Summit Lake Dam to powerhouse</u>	III-V
10	Horsepasture	<u>US Route 281 to Lake Jocassee</u>	V+
45	Hungry River	<u>Big Hungry Road to Green River</u>	IV
65	Linville	<u>Linville Falls to Lake James</u>	IV-V+
33	Little (Fr.Broad trib)	<u>Base of Triple Falls to Hooker Falls</u>	III-IV
30	Looking Glass Creek	<u>Along Highway 278</u>	III-IV(V+)
40	Middle Creek	<u>NC 106 - Park and Huck</u>	III-IV(V+)
30	Nantahala	<u>1) Cascades: FS Road 327 to 1310 Bridge</u>	IV-V
30	Nantahala	<u>2. Route 1310 Bridge to Hwy. 19</u>	III
25	West Fork Pigeon	To 215	IV-V
30	Snowbird Creek	<u>Hooper Bald to Junction</u>	III-IV+
30	Snowbird Creek	<u>Junction to First Bridge Downstream</u>	III-IV
30	Tannasee Creek	<u>in Pisgah</u>	III-IV(V+)
35	Thompson	<u>N.C. Route 281 to Lake Jocassee</u>	IV-V+
15	Toxaway river	<u>Above Lake Toxaway</u>	IV-V+
15	Tuckasegee	<u>Section 0. Above Tanasee Creek Reservoir</u>	III-V
10	Tuckasegee, West Fork	<u>Thorpe Dam to Tuckasegee River</u>	III-IV+(V)
25	Whiteoak Creek	<u>through the Nantahala Cascades</u>	IV-V+
5	Whitewater River	<u>Bullpen Rd (SR 1103) off Hwy 107 to Hwy 281</u>	IV-V+
50	Wilson Creek	<u>to Brown Mtn Beach</u>	III-IV+(V)
40	Yellow Creek	<u>SR 1242 to Cheoah/ US 129</u>	IV-V

<http://www.americanwhitewater.org/rivers/state/NC/>



*Written by Doug Adams, Mike Bamford and Tom McGinnus.*



**Shane Benedict**  
<shane@Liquidlogickay  
aks.com>

09/02/2007 09:53 AM

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject: Chattooga Scoping Document

Mr. John Cleeves  
U.S. Forest Service  
4931 Broad River Road  
Columbia, SC 29212

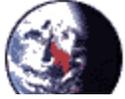
Dear Mr. Cleeves,

I support option #6.

I have been using the Chattooga Watershed from the Highlands/  
Cashiers area for 30 years,  
as a hiker, camper, fisherman, and paddler. Paddlers should have the  
same access as anyone  
else.

Respectfully yours,

Shane Benedict



"Luther Turner"  
<zaty@earthlink.net>

09/02/2007 03:06 PM

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: Upper Chattooga River

Dear John Cleeves,

My Great-great Grandparents settled in Horse Cove in 1838. This is a short distance from the current Grimshaws Bridge and Bull Pen Rd. Bridge. So I am very familiar with the beautiful Upper Chattooga and beg the Forrest Service to please decide on the first Chattooga alternative recently released by the Forest Service.

That is: Maintain existing management which allows boating below the Highway 28 Bridge **only**. I am familiar with the Chattooga below the Hwy. 28 bridge and would not like to see the same thing happen to the Upper Chattooga. Further, with my knowledge of this area, portage will be a huge problem. It would be devastating to see this pristine area destroyed as a result of having to portage so much of the area, not to mention the noise a probable trash.

Please. No boating above the Hwy. 28 Bridge.

Thank you very much for your consideration.

Luther S. Turner  
4188 Horse Cove Rd.  
Highlands, NC 28741  
(828)526-9914



"Miles Small"  
<milessmall@hotmail.com>  
m>

09/02/2007 05:31 PM

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject: Wild and Scenic for everyone non-motorized!

Mr. John Cleaves  
U.S. Forest Service  
4931 Broad River Road  
Columbia, SC 29212  
[comments-southern-francismarion-sumter@fs.fed.us](mailto:comments-southern-francismarion-sumter@fs.fed.us)

RE: Chattooga Scoping Document

Dear Mr. Cleaves,

The alternatives currently proposed by the USFS require substantial amendment because they are not supported by or tied to actual capacity data, are not consistent with the USFS's appeal decision governing this process, are not consistent with applicable law, and will not protect the Chattooga River. The USFS's own capacity study demonstrated that boating is an appropriate use of the Upper Chattooga River, yet 5 of your 6 proposed alternatives ban boating on some or all of the upper river. The Upper Chattooga's capacity to support whitewater boating is not zero, and all action alternatives must allow at least some boating on the entire river. Any alternatives that limit recreation must do so based on the capacity of the river corridor as determined by real data – and must do so equitably.

In addition, the proposed alternatives should be amended as follows:

- Proposed use limits must be tied to a specific standard regarding user capacity. Only one USFS alternative even mentions a standard (Alternative #2).
- Limits must be applied equitably and fairly – not targeted to *any* specific user groups without significant evidence. All USFS alternatives single out boating for harsh limits and bans – for which there is no evidence.
- Limits should only be imposed when standards are met or exceeded – and not before. Five of the six USFS alternatives limit and/or ban boating immediately without basis.
- Alternatives must include a range of standards for *all users*. USFS alternatives address a range of arbitrary limits on boaters – but only one alternative would limit other users. For example, a standard of 10, 6, and 2 group encounters per day should be analyzed, as well as provisions that exclude the outlier days when high use can be expected or occurs randomly.
- Alternatives must be based on a capacity for all users and/or individual uses. The proposed USFS alternatives are not based on the social or physical capacity of the river corridor.
- Alternatives must prescribe indirect limits prior to direct limits as is required by USFS policy. Five of the six alternatives implement direct limits (i.e., bans) prior to trying indirect limits first in direct violation of USFS policy.
- Alternatives, including any capacity triggers, should distinguish between high use

frontcountry areas and low use backcountry areas. USFS alternatives make no distinction between how many encounters with other users are acceptable in a campground or at a trailhead as opposed to on a trail or river deep in the woods.

- Alternatives should look at varying levels of user created trail closures, user created trail hardening, creation of new trails, campsite closures or relocations, fish stocking, parking, total recreational use, angling use, hiking use, camping use, boating use, and swimming use.

I fully agree with the ideas presented and wish for proper non-biased management of our national resource.

Sincerely,

Miles Small  
338 Grand Ave  
Salida, CO 81201  
[milessmall@hotmail.com](mailto:milessmall@hotmail.com)

---

[Gear up for Halo® 3 with free downloads and an exclusive offer.](#)



**"John Monroe"**  
<jmonroe@beverly-hank  
s.com>

09/03/2007 01:03 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: Please keep Boats off the Chattooga North Fork.

Please keep Boats off the  
Chattooga North Fork.

John S. Monroe

Beverly-Hanks Commercial  
410 Executive Park  
Asheville, NC 28801

828.210.3040 Work  
828.210.3943 Direct  
828.210.3944 Fax  
828.231.6044 Mobile



"Wyatt Stevens"  
<WStevens@roberts-ste  
vens.com>

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc: "FOTUC, Bamford, Mike - WCA" <mbamford123@comcast.net>  
Subject: Chattooga River

09/03/2007 08:11 AM

Please keep boats off the Chattooga North Fork. It is too small and too precious to spoiled by thrill seeking kayakers.

Thank you for attention to this important matter.

Wyatt S. Stevens  
Roberts & Stevens, P.A.  
One West Pack Sq.  
Suite 1100  
Asheville, NC 28801  
Direct dial 828-258-6992  
Fax 828-253-7200

The information contained in this message is Attorney Privileged and Confidential information intended only for the use of the individual or entity named as recipient. If this communication has been received in error, please notify us immediately by replying to the message and deleting it from your computer.

Any statement regarding tax matters herein, including any attachment, is not intended or written to be used, and cannot be used, by any person for the purpose of avoiding tax related penalties or promoting, marketing or recommending to any other party any tax related matter addressed in this communication.

\*\*\*\*\*  
This message has been scanned for viruses by Roberts & Stevens, P.A.

NOTICE: This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to the attorney-client privilege or other confidentiality protections. Any review, copying, printing, disclosure, distribution, or any other use by any other person or entity is strictly prohibited. If you are not a designated recipient, or believe you have received this email in error, please reply to the sender and delete the copy you received. Thank you.

\*\*\*\*\*



"James Fearon"  
<bikerjim2000@hotmail.  
com>

To: comments-southern-francismarion-sumter@fs.fed.us  
cc:  
Subject: Chatooga

09/03/2007 10:23 AM

I would ask you to consider alternatives 4 , 5 or 6. I would enjoy to paddle  
the upper reaches of this beautiful river.  
Thank you  
JJF.

---

It's the Windows Live™ Hotmail® you love – on your phone!  
[http://www.windowsmobile.com/hotmailmobile?ocid=MobileHMTagline\\_2](http://www.windowsmobile.com/hotmailmobile?ocid=MobileHMTagline_2)



toweyp@comcast.net

09/03/2007 05:31 PM

To: comments-southern-francismarion-sumter@fs.fed.us

cc:

Subject: Chattooga Scoping Document

Mr. John Cleeves  
U.S. Forest Service  
4931 Broad River Road  
Columbia, SC 29212  
[comments-southern-francismarion-sumter@fs.fed.us](mailto:comments-southern-francismarion-sumter@fs.fed.us)

RE: Chattooga Scoping Document

Dear Mr. Cleeves,

The alternatives currently proposed by the USFS require substantial amendment because they are not supported by or tied to actual capacity data, are not consistent with the USFS's appeal decision governing this process, are not consistent with applicable law, and will not protect the Chattooga River. The USFS's own capacity study demonstrated that boating is an appropriate use of the Upper Chattooga River, yet 5 of your 6 proposed alternatives ban boating on some or all of the upper river. The Upper Chattooga's capacity to support whitewater boating is not zero, and all action alternatives must allow at least some boating on the entire river. Any alternatives that limit recreation must do so based on the capacity of the river corridor as determined by real data – and must do so equitably.

In addition, the proposed alternatives should be amended as follows:

- Proposed use limits must be tied to a specific standard regarding user capacity. Only one USFS alternative even mentions a standard (Alternative #2).
- Limits must be applied equitably and fairly– not targeted to *any* specific user groups without significant evidence. All USFS alternatives single out boating for harsh limits and bans – for which there is no evidence.
- Limits should only be imposed when standards are met or exceeded – and not before. Five of the six USFS alternatives limit and/or ban boating immediately without basis.
- Alternatives must include a range of standards for *all users*. USFS alternatives address a range of arbitrary limits on boaters – but only one alternative would limit other users. For example, a standard of 10, 6, and 2 group encounters per day should be analyzed, as well as provisions that exclude the outlier days when high use can be expected or occurs randomly.
- Alternatives must be based on a capacity for all users and/or individual uses. The proposed USFS alternatives are not based on the social or physical capacity of the river corridor.
- Alternatives must prescribe indirect limits prior to direct limits as is required by USFS policy. Five of the six alternatives implement direct limits (i.e., bans) prior to trying indirect limits first in direct violation of USFS policy.
- Alternatives, including any capacity triggers, should distinguish between high use frontcountry areas and low use backcountry areas. USFS alternatives make no

distinction between how many encounters with other users are acceptable in a campground or at a trailhead as opposed to on a trail or river deep in the woods.

- Alternatives should look at varying levels of user created trail closures, user created trail hardening, creation of new trails, campsite closures or relocations, fish stocking, parking, total recreational use, angling use, hiking use, camping use, boating use, and swimming use.

I enjoyed paddling this river as an young man with my father. It was an enjoyable experience that I will always have in my memories. I am asking that you allow me the opportunity to create the same memories with my children when they get older. Please consider these recommendations. Thank you for your time in this matter.

Sincerely,

Peter Towey  
27 Bonny View Road  
W. Hartford, CT 06107



"David Bailey"  
<david@unitedwayabc.org>

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject:

09/04/2007 07:31 AM

To Whom It May Concern

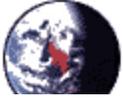
"Please keep Boats off the Chattooga North Fork."

Boats in this wilderness area on the N.C. and S.C. border and will negatively impact fishing on the headwaters of the Chattooga River. Boaters have access to 90% of the river already. Opening this part of the river up will also have negative impact to surrounding private property owners.

Thanks

David D. Bailey

828-255-0696 ex 313  
828-255-8004 fax



"ken"  
<kenfran@tds.net>  
09/04/2007 07:56 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: Boating Chattooga Headwaters comment

I support boating on the Chattooga headwaters.

Alternative #6 of the six proposals presently offered by the USFS study is the only one I can support. Alternatives 4 & 5 would be acceptable IF they also limited the number of other qualifying user groups (non-commercial, non-mechanized, & non-motorized) too.

I feel that the boater user group has been unfairly singled out for what is to me some unknown reason and that if future impact of an area is a concern, then caps should also be placed on the other user groups at this time.

Ken Strickland  
210 Padena Dr.  
PO Box 63  
Morganton, GA 30560



The Lorax  
<loraxvw@hotmail.com>

09/04/2007 08:55 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>,  
<dkinser@ediltd.com>

cc:

Subject: Chattooga headwaters comments

Dear USFS ~

I am writing to offer my comments of support for fixing the management plan on the Chattooga Headwaters. I have read the six alternatives and have given each of them some careful thought.

Alternatives 1, 2 & 3 are unfair to the boater user group in that they uphold a ban on boating at all when it has been clearly demonstrated that the waterways can be safely shared. Additionally alternatives 4 & 5 are unfair to boaters in that they single out boaters for limitations in numbers while no other groups are under any such restrictions. Boaters will have less of an impact than any land-based travel so I cannot see how that would be beneficial to any user group or provide protection of the resource.

May I say that while alternative #6 provides safe, fair access for boaters, it has it's weaknesses as well. Let me be clear: OF THE SIX OPTIONS, #6 IS MY CHOICE. However, it APPEARS that you have lumped boaters in with the same alternative choice that provides no increased level of protection for the stream banks, does not address the problem that parking by the bridges creates, etc...

I want an option where parking is removed from the Wild & Scenic corridor. I want an option that provides for some repair to all those eroded fishermen trails that plague the areas within a mile of each bridge. I want an option where when I see that the river is running by doing my own daily rain & water level research, I can quickly gather my expert kayaking colleagues and determine that a section of the Chattooga headwaters might provide the day's best recreation. I want an option where as time goes by, if the wilderness gets too crowded, any limitation of visitors is evenly distributed among user groups. An option where intrusion to this area is measured (self-registration) would be nice.

I see that Kevin Colburn of American Whitewater has written an alternative alternative, which addresses my main concerns. You can read that here, if you haven't already:  
[http://www.americanwhitewater.org/content/Document\\_view\\_documentid\\_165\\_](http://www.americanwhitewater.org/content/Document_view_documentid_165_)

In short, I would like to free up boating on the headwaters without limitations due to things I can't control. If there is a significant rain event outside of the date ranges in #4 or 5, it would make no sense to limit my paddling then. If more than three other groups showed up during one of those significant rain events, that is something I cannot control. We would have to separate our launch times in order of arrival as we do naturally on every other river. #6 is my preferred choice of your options, but I far prefer American Whitewater's proposed alternative in that it fixes all of my concerns listed above.

Thank you ~ Jeff Tallman  
LoraxVW@hotmail.com  
828-301-4561

59 Moore Ave.  
Asheville, NC 28806

---

Connect to the next generation of MSN Messenger [Get it now!](#)



"Cumnock, Mark"  
<MCUMNOCK@SOUT  
HERNCO.COM>

09/04/2007 09:39 AM

To: <comments-southern-francismarion-sumter@fs.fed.us>  
cc:  
Subject: Option #6 for the Chattooga River

Dear Sirs:

Would you please consider Option # 6 for the Chattooga River Headwaters?

Whitewater paddlers have very limited impact on the environment when compared to other user groups. We leave no trash and only footprints, matter of fact my paddling group, we take mesh bags to carry out trash left by fisherman and campers.

There are very few places in the Southeast where a person can experience a wilderness experience, and seeing it from a whitewater craft is a enjoyable experience, that leaves no trace. Please help me learn that experience. The Headwaters only runs, a couple times a year so our impact would be at a minimum.

Thank you for taking time to read this.

Mark Cumnock

716 Tennessee ST

Spring City TN.

37381