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DC

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PLEASE REPLY TO: Highlands Office
or e-mail melvin@joneskey.com

August 21, 2007

U.S. Forest Service
4931 Broad River Road
Columbia, South Carolina 29212

Re: Chatooga River

49 <

This is to advise that I oppose all boating, canoeing, kayaking, etc. on the upper Chatooga River.

Yours truly,



Richard Melvin

661
DC

August 21, 2007

John Cleeves
US Forest Service
4931 Broad River Road
Columbia, SC 29212

H { I would like to comment on the Proposed Revised Land and Resource Management Plan for the Sumter National Forest, in particular, for the proposed changes to the status of the Chattooga River. I am a canoer, kayaker, and a fisherman. I am against any changes to the existing uses of this river.

H { I, and my two sons, are kayakers, canoers, and fishermen. We have kayaked and canoed the Chattooga River from Rt. 28 to the Tugaloo Lake on several occasions, both in the summer and in the winter. This stretch of water is outstanding kayak and canoe water, hard to duplicate in any part of the country.

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131 { I, and my two sons, are also trout fishermen. We have concentrated our trout fishing above the Rt. 28 bridge for the past 25 years. We used to fish below the Rt. 28 bridge, but when this portion of the river was opened to boaters, stocking stopped and the water became less interesting to a fisherman. As you can see we concentrate our fishing on the stretch above the Rt. 28 bridge and kayak and canoe on the long stretch below the Rt. 28 bridge and the shorter stretch below the Rt. 76 bridge. In our opinion, the stretch of water from Rt. 28 to the Tugaloo Lake is already a sufficiently long stretch of this river open to kayaks and canoes and more encroachment on the remaining portion of the river is neither needed, nor a wise investment in this river.

117 { This river is a unique resource in the Eastern United States. Major portions of the river have no road or human habitation along them. These stretches provide a near-wilderness experience for those who use them. The stretch below the Rt. 28 bridge provides a couple of days of near-wilderness boating for those who use the river. The stretch above the Rt. 28 bridge, which is presently closed to boat traffic, provides the fisherman with a place to fish in solitude and outstanding beauty. This stretch of water is also not a very interesting stretch to kayakers and canoers, particularly during normal and low water conditions. Opening this stretch of river to boaters would degrade the unique outdoor experience that this portion of the river provides.

20
24 { From a practical point of view, I think the self-policing policy suggested for boaters is unworkable. I have often encountered kayaks and float tubes on the stretch above the Rt. 28 bridge, in violation of existing regulations. The people who float this portion of the river know that law enforcement is almost non-existent and opening the river to floating in high water only would be consistently violated by boaters. If they make the drive up to the river with the intent of boating, water levels below those specified for boating would not deter them from boating on the river, regardless of the regulations. I am concerned also about trash and litter left behind by boaters. There is presently almost no trash along this stretch of water, except near the roads that cross the river. Opening the river to more casual users will, no doubt, lead to more trash, as we have found on the open stretch below the Rt. 28 bridge. The stretch of water presently open to kayakers and canoers is full of trash left behind by the boaters.

49
60 { In summary, I would urge that you leave the uses of the Chattooga River as they presently are: that is, boating allowed below the Rt. 28 bridge and no boating above the Rt. 28 bridge. To restate an important point, even limited boater access to the river above the Rt. 28 bridge will be equivalent to complete access to the river. The Forest Service will not receive additional funds to police any new boater access policy, and it is highly unlikely that boaters will obey any limited access rules, should they self police these rules.

David J. Dumin

David J. Dumin
202 Lakeside Court
Clemson, SC 29631
864-645-6415

062

De

THEODORE A. SNYDER, JR.
P.O. BOX 40
WALHALLA, S.C. 29691
864/638-3686

89
signatures

10 August 2007

John Cleves
4931 Broad River Road
Columbia, SC 29212

Re: Upper Chattooga River Visitor Use

Dear Mr. Cleves:

49 <

Enclosed find petitions bearing 89 signatures of persons opposed to opening the upper Chattooga River to boater access.

Please make these a part of the public record on this project.

Yours very truly,


THEODORE A. SNYDER, JR.

LEAVE THE UPPER CHATTOOGA ALONE !

We oppose the opening of the Chattooga River above Highway 28 to any kind of floating, whether by canoe, kayak, raft, inner tube or otherwise. Recreational floating and fishing are not compatible. The upper Chattooga should be for fishermen, for hiking, and other uses on which floating is an intrusion. The upper Chattooga is not safe for floating. If opened to floating it would add to the burden of county rescue squads and EMS at taxpayer expense. Opening the upper Chattooga to floating would bring immediate pressure to build or re-build roads to provide for all-weather access, turning this wild country into another exclusive franchise for the highly profitable rafting companies, and not for all our citizens.

<u>NAME</u>	<u>ADDRESS</u>
Rogan Juncannon	Walhalla SC
Byron Amick	Walhalla SC
Kim Amick	Walhalla SC
Mary Barnes (Whitten)	St. Walton Bch. SC
Carolyn Oice	West Union SC
Lynn Moore	West Union SC
Bill Watt	Seneca SC
William M Turner	Westminster SC
Helen R Greer	West Union SC
Pat Smith	Westminster SC
Ray Morrison	Westminster, S.C.
Shawn Johnson	Walhalla Post &
Alton Calkins	Walhalla SC
Sonya P. Stewart	Walhalla S.C.
Ashley K Ward	Walhalla SC
Edwin Durrell	Walhalla SC
Lynne McLees Ray	Greenville SC
Stanley Shook	Westminster SC
Kim Rogers	Westminster SC
Johny Freeman	Westminster, S.C.
Darryl Burtenshaw	Seneca SC

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NAME	ADDRESS
Brown	Walhalla (8)
Judy O'illy	_____
Mary Kay Wade	_____
Kay L. Miller	Mt Rest
Gene Buer	Mt Rest
Dan Cahio	_____
Joe Stone	_____
Ralph Burrell	N. Line Walhalla
Melford Grant	Walhalla, SC
Jean Grant	"
Jan Clarke	Mtn Rest SC
Michael Clarke	Mtn Rest SC
Virginia Campbell	Mtn Rest SC
Mike Campbell	Mtn Rest SC
Ben Wilhank	Mtn Rest SC
Amber DUNCAN	Westminister SC
James Smith	Westminister SC
Denise Duncan	Westminister SC
Greg & Duncan	Westminister S.C.
Kathy Duncan	Westminister S.C.
Annal Cannon	Westminister, S.C.
Sherri Kefon	Walhalla, SC

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<u>NAME</u>	<u>ADDRESS</u>
Ray Galloway	Liberty, SC
Ray Galloway	Mt. Rest, SC.
Roddie Galloway	Walhalla, SC.
Nobby Steady	Walhalla, SC
Ernest Steady	Walhalla, SC
Grant Steady	Walhalla, SC
Rebecca Purdin	Walhalla, SC
Bryan Purdin	Walhalla, SC
James Smith	
Nita Smith	
Joyce Roach	Walhalla, SC
Billy Stewart	West Union, SC
Cham, Smith	West Union, SC
Billy W. W.	Spec. C.C.
W. W.	Fair Play, S.C.
J. W.	Westminster, S.C.
Martha Huitt	Seneca, SC
Juanita Crowe	Walhalla, SC.
Sue Ward	Mtn. Rest, SC
Fatmy Pearson	Seneca, SC
Connie S. Knorr	Walhalla, SC

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NAME	ADDRESS	
David B. Rogers	705 John + Kayla Ln Westminster SC	29693
Marshall G. Knott	P.O. Box 422 West Union S.C.	29696
Clark R. Phillips	121 Spider Valley Rd Long Creek SC	29658
Susan W. Phillips	121 Spider Valley Rd Long Creek SC	29658
Shirley Flood	651 Rock Crusher Rd Walhalla SC	29691
Helen Flood	117 Marks Place Seneca, SC	29678
Henry H. Flood	651 Rock Creeker Rd, Walhalla, SC	29691
Wimpyl Mbeved	565 Shanty Ridge Rd Walhalla SC	29691
Steven Bentley	120 Lisa Ln., Mountain Rest, S.C.	29664
Bobby Lee Rogers	1206 Coffee Rd. Westminster S.C.	29693
Dick Loyce	341 Rocky Knoll Rd Wal SC	29691
Jim McCall	206 Highlands Hwy Walhalla SC	29691
Anna Zelaya	150 Wade Taylor Rd Union 29696	
Zach Zelaya	" "	
Cruz Ward	" "	
Mary McCullough	10410 Long Creek Hwy, Westminster SC	29693
George McCullough	" "	
Robert C. Winchester	1153 Coffee Road Walhalla SC	29691
Cashley Shred	195 Fowler Rd Walhalla SC	29691
Jack Kelon	330 Brown Woods Dr West Union SC	
Deborah E. Cobb	665 Flat Shoals Rd, WALHALLA, SC	29691

663
DC

505 Turkey Trot Road
Mountain Rest, SC 29664

August 8, 2007

US Forest Service
John Cleeves
4931 Broad River Road
Columbia, S.C. 29212

Dear Mr. Cleeves:

49 <
131 <
As a citizen of Mountain Rest I believe that the Chattooga River is one of the primary natural treasures in upper South Carolina. Having grown up in Mountain Rest, lived in other places for many years and now returned to live permanently in this area, I realize that it is important I support the efforts of many citizens to preserve the upper Chattooga by continuing to prohibit boating in this still unspoiled area. In the words of many other voices, there is plenty of the rest of the Chattooga for boating and kayaking. I have hiked the trail from Walhalla Fish Hatchery to Ellicott Rock and know it is a wild and beautiful part of the county.

I hope that we can preserve this part of the Chattooga not only for those who would use it with a minimum effect on the natural environment but also with the knowledge that it is a part of the dwindling habitat of endangered animal and plant species.

May it always be so.

Sincerely,

Shirley Reeves

Shirley Reeves

LAWRENCE CAMPBELL - MASSACHUSETTS
4210 Hwy 91 South
Anderson, S.C. 29624

8-3-07 664

DO see 451

DEAR MR. CREEVES,

I do not think I could
write a better version of exactly
the way I feel than the enclosed
article. John Landers is on the
money when he writes about the
upper Chattooga River. Please don't
49 open it to boaters, kayakers.
My mother and father purchased
three lots on Lake Hartwell in 1968
near the double bridges on Hwy 24.
What would that lake look like
or be like without the management
of the Corps of Engineers. We respect
their rules and have always followed
their management practices. Yes we
have had to remove a pipe or remove
something else on the dock, but
they (Corps) have also used our
home and property as an example
on yours. (of how to keep your property

had the Corps property down to the lake)

I am a farmer, hunter, and
have worked many years with the
local soil and conservation service.
(out of college in 1972 and worked with
Mr. Watkins, Hocke, and Wiggington
to lay out my first meadow strips,
etc.)

Let this area on the Chattooga
River alone. Let it live
and be preserved for many
future generations.

Thank you for your service
and continued success with USFS.
Again, Mr. Hadras points are
Excellent.

Sincerely,

Lawrence Campbell

665
DC

August 4, 07

Dear Mr. Cleaves;

(49) Please maintain the boating ban on the Upper Chattooga River. It is a beautiful pristine stretch of wild river, which, I'm afraid, it will cease to be if boating is allowed on it.

I'm an avid outdoor enthusiast, a resident here since 1990, and value the beauty and serenity of this Southern Blue Ridge Area. I have been a member of The Nature Conservancy since 1985, and have funded the purchase of two acres for the Stomphouse Tunnel / Issaqueena Falls for the TNC. That's how much I value conservation in this Upstate Area.

Please maintain the boating ban.

Sincerely,

Tom Bradford

Forest Service,

666 ^{see} ^{US} _{DC}

49 / I agree with the columnist,
John Landers, in the Anderson
Independent Mail Aug. 2, 07.

Please do not lose the
treasure of the upper Chattooga
River. #666

When we moved to the Anderson
Area 20 yrs. ago, we thought the
pristine areas of the Blue Ridge
Mountains & Foothills were very
special. We had not seen un-
commercialized areas like that in
our other travels. Hopefully, the
Issaqueena Falls area is being
preserved.

Please do not lose these
areas. They may be the only
ones left as natural areas.

Marilyn Aldridge
1011 Summer Place
Anderson, SC, 29621

667
DC

August 21, 2007

Dear Mr. Cleeves:

We are writing to voice our comments and opinions regarding future management of the upper Chatooga River. Thank you for this opportunity and also for the Open House hosted by the Forest Service in Walhalla, SC on 6/21/07. It was very informative, and we believe that Mr. Whitaker did an excellent job in his data collection and presentation.

We believe that you would be hard-pressed to find anyone who enjoys and utilizes the Chatooga River in the multitude of ways my wife and I do. For years we have hiked, camped, rafted, kayaked, and fished within the Chatooga River boundary. We love hiking through the solitude of the upper river as we love the excitement and adventure of rafting/kayaking the lower portions. We believe that the original plan struck the right balance as far as designating uses to be allowed within the upper and lower portions.

49 ←
25 ← Therefore, we urge you to maintain the current ban of boating above Hwy. 28 bridge. We believe this is the best way to ensure continued use of the Chatooga Wild and Scenic River in the most appropriate fashion. We also support any and all steps that might need to be taken to maintain and protect this special place, including limiting visitor/use numbers if necessary.

Sincerely,

Mike Manley
Karen Manley
Mike and Karen Manley
1158 Cartee Rd.
Anderson, SC 29625

South Carolina Department of Natural Resources

September 7, 2007

Mr. Jerome Thomas, Forest Supervisor
US Forest Service
Francis Marion & Sumter National Forests
4931 Broad River Road
Columbia, SC 29212-3530



John E. Frampton
Director

Dear Mr. Thomas:

We appreciate the opportunity to comment on the Forest Service's proposed management alternatives for the Chattooga River. I value our long-standing cooperative partnership on behalf of natural resources in South Carolina. The South Carolina Department of Natural Resources has managed the Chattooga River trout fishery for many decades. The Chattooga River trout fishery is the largest self-sustaining trout stream in South Carolina. The stream also provides suitable water for a very active trout-stocking program to enhance fishing in areas where trout do not reproduce successfully. The scenery, solitude, and quality fishing available on the Chattooga make it the most popular trout-fishing destination in the state.

A recent angler survey revealed that more than one-fourth of all fishing for stocked trout in South Carolina occurs on the Chattooga. Trout fishing in South Carolina generates almost 18 million dollars to the state's economy according to a 2001 study commissioned by SCDNR. The Chattooga River is such a unique fishery it was voted as one of the top 100 trout streams in the nation by the National Chapter of Trout Unlimited. Such accolade surely results only from successful management by USFS and state agencies.

Our fisheries management staff has studied the six proposed management alternatives. We have also discussed these issues with our partners in the Georgia Department of Natural Resources. Our concerns and management preferences for the river are closely aligned with Georgia's. Enclosed are detailed comments on each of the six proposed alternatives as outlined in your scoping letter dated August 14, 2007. We urge you to carefully consider the potential impacts, as outlined in our comments, of the proposed changes on the trout fishery of the Chattooga River.

Based on our analysis, we support the adoption of either Alternative 1 or 3. These alternatives would be the least disruptive to the quality trout fishery. With some adjustments, Alternative 2 would also be acceptable, but would place certain restrictions on users that do not seem justified at this time. We firmly believe the Forest Service's zoning of whitewater boating and trout fishing spatially to minimize conflicts is a fair, equitable way to ensure quality recreational opportunities for each user group.

Our agencies have built long and productive relationship, and I value this opportunity to provide input into your planning process. If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

John E. Frampton
Director

Enclosure

CC: John Cleaves, USFS Governor Mark Sanford #713288
Breck Carmichael, SCDNR Val Nash, SCDNR

Rembert C. Dennis Building • 1000 Assembly St • P.O. Box 167 • Columbia, S.C. 29202 • Telephone: 803/734-4007

EQUAL OPPORTUNITY AGENCY • framptonj@dnr.sc.gov • www.dnr.sc.gov • PRINTED ON RECYCLED PAPER

Rec'd FS
9-10-07

Analysis of Proposed Alternatives for Chattooga River Management in the Draft Revised Land Management Plan and EIS, Sumter National Forest, South Carolina

**Georgia Wildlife Resources Division and the
South Carolina Department of Natural Resources
June 2003**

Background: The Chattooga River Trout Fishery

The Chattooga River upstream from Highway 28 is recognized by trout anglers as one of the finest trout streams in the Southeast due to its combination of scenic beauty, solitude, and trout fishing success. This section of stream offers many anglers an experience that is extremely rare in the eastern United States. The lower Chattooga River supports excellent fishing for coolwater species such as redeye bass and warmwater species such as bullheads, but the remoteness of the river limits angling pressure.

The Chattooga River represents a significant component of the coldwater fisheries resources in both Georgia and South Carolina. It supports a wild brown trout fishery in the upper reaches and a hatchery-supported fishery in the lower sections (Durniak 1989). State wildlife agencies stock the river with catchable (nine to twelve inch) fish to satisfy trout angler demand. Prior to Wild and Scenic designation of the river, catchable trout stocking was done as far downstream as Highway 76. State agencies and the U.S. Fish and Wildlife Service (USFWS) had also stocked fingerling (four-inch) brown trout into this lower section to maintain a put-grow-take fishery for that species.

Because of the increase in recreational and commercial boating activity that occurred after the river received Wild and Scenic designation in 1974, conflicts began to occur between anglers and boaters. As a result of those conflicts, the USDA Forest Service (USFS) decided in 1976 to zone the Chattooga into boating and no-boating sections (Federal Register, March 22, 1976). Boating was prohibited upstream from Highway 28 and allowed in the main stem downstream from Highway 28 and in the West Fork Chattooga River. At the same time, the South Carolina Department of Natural Resources agreed to cease catchable trout stocking below Long Bottom Ford (just downstream from Highway 28) to reduce user conflict and act in partnership with the USFS. This concession led to the loss of catchable trout management in approximately 20 miles of river, leaving about 12 miles to accommodate the stocking program and its multitude of anglers. These actions have effectively separated anglers and boaters and maintained the quality of their respective experiences. This arrangement has worked well for the past 27 years.

Since 1986, fisheries managers from the state wildlife agencies in Georgia, South Carolina, and North Carolina, the USFS, and the USFWS have conducted extensive monitoring of the fish community and trout fishery of the upper river. Based on this information, fishery biologists have managed different sections of the river to optimize

the available fishery habitat and meet angler expectations. The uppermost section, from Burrells Ford Bridge upstream to the North Carolina line and beyond, is managed as a wild trout stream, which is dominated by naturally reproducing brown trout. Trout angling specialists who value the unique combination of scenic beauty, solitude, and the challenge of a wild trout fishery frequent this section. It is also used by some angling generalists who visit the wilderness to hike, camp, and fish. Most anglers park at Burrells Ford.

The section in the immediate vicinity of Burrells Ford Bridge is stocked frequently with catchable rainbow trout, and as a result, it is very popular with anglers. The stocking program, easy access at the bridge, and presence of the Burrells Ford Campground make this area heavily utilized by anglers.

The section between Burrells Ford Campground and Reed Creek is managed as a put-grow-and-take fishery. This area is stocked annually with fingerling trout by helicopter in a cooperative effort among the two state wildlife agencies, two USFS districts, and Trout Unlimited. The result has been a very popular fishery with anglers seeking a backcountry experience.

Since 2002, the 2.3 mile river section from Reed Creek downstream to Highway 28 has been managed as a delayed harvest stream, where anglers can fish under catch-and-release regulations from November to May in a stream segment that has been supplementally stocked to increase angling success. Angler use is high during fall, winter, and early spring due to the enhanced trout population and special fishing regulations. Weather and road conditions are the limiting factors to winter angling pressure here.

The Chattooga River from Highway 28 downstream to Long Bottom Ford has remained popular with generalist trout anglers because of the trout stocking program and ease of access. This segment is extremely popular with South Carolina anglers.

A 1998-99 angler creel study (Geddings and Rankin 2000) documented anglers from 20 different states fishing on the Chattooga River in the immediate vicinity of trout stocking sites. Angling effort near access sites on the Chattooga watershed accounted for more than 128,000 angler hours (35,934 trips). This total does not include backcountry angling in the remote sections of river.

This cooperative fishery management program has worked well. Trout Unlimited, a national conservation organization, named the Chattooga River as one of the top 100 trout streams in America.

Chattooga Boating Alternatives: State Wildlife Agency Analysis Of the Draft Forest Plan and EIS

The Draft Environmental Impact Statement (DEIS) presents the issue of boating upstream from Highway 28 on page 3-285. This issue was not formally considered until six years into the USFS planning cycle, with relatively little information provided at public meetings, especially in Georgia. This was disappointing. The DEIS relies on Appendix H to evaluate the differences among the various alternatives concerning boating above Highway 28. Therefore, the information in Appendix H is critical to 1) providing the public with a complete understanding of the issue and 2) providing the USFS with complete, objective information from which to reach a decision regarding recreational use.

Appendix H does an adequate job of describing the various alternatives and roughly estimating the proportion of time that boating would be expected to occur under each alternative. This section does have several significant shortcomings, however, that should be addressed in the final EIS in order to give this analysis improved objectivity and greater credibility.

Our concerns are based on social effects of river management, and the shortcomings in Appendix H relate to the assessments of user conflict and angler satisfaction. The DEIS refers to "user conflict" when analyzing non-motorized trail supply and demand (page 3-260), but Appendix H refers to boater/angler interactions as "encounters" and not "conflicts". Consistency throughout the document would strengthen it. Use of the term "conflict" would allow a more objective assessment of the situation between these two user groups, based on:

- the history of this issue on the Chattooga River;
- the USFS zoning program currently in place;
- recent feedback from Chattooga River trout anglers to our agencies regarding the draft Sumter Plan revision;
- guidance provided by the Southern Forest Resource Assessment (USDA 2001) on the analysis of user conflict.

Appendix H (page H-6) does not explain why the river was originally zoned to separate boaters and anglers. The issue of boater/angler conflict was cited in the Federal Register (March 22, 1976; page 11849, "Fishing" section). This Federal Register document, entitled "Development Plan- Chattooga Wild and Scenic River", clearly shows the intent to zone the river to maintain the quality of experiences for both boaters and anglers. For example, the narrative for Nicholson Fields (page 11852) includes the following, "This location is the source of some of the best trout fishing in both South Carolina and Georgia. Floating will be prohibited above Highway 28 which includes the Nicholson Fields." This history should be included in Appendix H. How else will DEIS

readers understand the current river management plan and the USFS recommendation of the Preferred Alternative?

State agency biologists provided technical assistance on the Chattooga fishery to Sumter National Forest planners as they drafted Appendix H last winter. Our concerns included the assessment of user conflict and better documentation of the history behind the existing boating regulations. We suggest that the final EIS will be much more complete and objective if these two very important concepts are better documented.

Alternative B, D, F, and I - No Change

These alternatives would preserve the present regulations that prohibit boating upstream from Highway 28. No changes to the trout fishery would be expected. Appendix H (page H-18) did document a long list of other streams where "creek-boating" opportunities would still be available if the upper 21 miles of the Chattooga remained closed to this activity. We support the maintenance of the existing boating ban and therefore support Alternative I, the Preferred Alternative.

Alternative E - Boating Allowed Between NC 1107 and Highway 28 Year-Round

This alternative has the highest potential for conflict between anglers and boaters because it opens a longer segment of river to year-around boating. The analysis presented in Appendix H suggests that boating use would be naturally limited by stream flows to about 81 boatable days per year below Bullpen Bridge. This may or may not be true, depending on the demand for river boating opportunities. Experienced whitewater boaters may indeed forego trips under low flow conditions, but casual boaters may still decide to take trips, thereby increasing the potential for conflict. Given projected increases in both fishing and boating (DEIS Table 3-80), conflict potential will increase through time. The effect of casual boaters on anglers was not addressed in the DEIS.

The DEIS incorrectly excludes March from the defined period of optimal fishing, and inadequately assesses conflict potential beyond the optimal fishing period. While the majority of angling use occurs from March through September (Durniak 1989; GADNR, unpublished creel data), there is still significant angling pressure on the Chattooga River in all seasons except winter (December to mid-February). In fact, fall angling pressure has increased dramatically just upstream from Highway 28 in response to the delayed harvest fishing regulations.

Appendix H (page H-15, second paragraph) does not adequately assess conflict potential between boaters and angling generalists near access points such as Burrells Ford and Highway 28. The assumption made (page H-16) that anglers fishing close to put-and-take stocking points would be more tolerant of boaters is misleading. It was the conflict that occurred between this type of angler and boaters in the early 1970's that resulted in the current river zoning system. Access point anglers may indeed be more

tolerant than those desiring solitude, but history indicates that there will still be some degree of conflict. The DEIS fails to account for the perceived negative effects of boater traffic on the fishing success of this angler group.

The discussion of trout stream substitution on page H-16 shows that acceptable substitutes are few, if any, for the majority of trout anglers in that survey. The short list of suggested substitutes, the Davidson, Nantahala, Tuckaseegee, and Chauga rivers, shows that anglers were forced to compensate for lost solitude by choosing higher catch rates at more intensively managed, easily accessed, crowded, and distant rivers. The survey also showed that almost all of the substitutes were in other states (Bixler and Backlund 2002, page 46). We do not consider the displacement of our resident anglers to out-of-state destinations an acceptable management alternative.

Alternative E is the least desirable from a fisheries standpoint because it has the greatest potential for angler/boater conflict. We do not support Alternative E.

Alternative A - Boating allowed From Burrells Ford Downstream From December 1 Through March 31 at Water Levels of 2.5 or Greater at The Highway 76 Gauge.

Under this alternative, Appendix H assumes that there would be an average of eleven days per year that boaters could use the river, and that angler use under these conditions would be low, resulting in fewer potential conflicts than Alternative E. While this assumption is correct, the potential for some conflict still exists and needs to be described in the document. The analysis of Alternative A does not reflect the conflict potential between boaters and anglers near access points, as described in our comments concerning Alternative E, above. This should be described in the final EIS.

The document also incorrectly assumes 100% compliance with the boating restrictions. We believe there will be additional days used by boaters that will increase conflict potential and further tax your law enforcement staff. If Alternative A is chosen, there will be increased demand for even more boating opportunities (such as those proposed by Alternative E), with this issue resurfacing again, shortly after Plan finalization.

Alternative A creates less potential for angler/boater conflicts in comparison to Alternative E, but greater potential for conflict when compared to the Preferred Alternative. Again, given increasing demand for water-based recreation, this potential will increase through time. We do not support Alternative A.

Conclusion

After reviewing Appendix H and the applicable history of the Chattooga River, we recommend strongly that the USFS maintain the existing boating ban and therefore support the adoption of Alternative I, the Preferred Alternative. The current zoning

system was developed to alleviate conflicts between anglers and boaters that existed prior to 1976, and it has worked well for our cooperating agencies and the public for 27 years. Chattooga River anglers and fishery managers accepted the compromise in 1976 and concentrated their efforts above Highway 28, basically ceding the lower river to boating. The reasons for this compromise are still valid. A more complete assessment of the issue of user conflict is needed in the final DEIS to support your recommendation to maintain the boating ban.

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September 5, 2007

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

Re: Public hearing of July 10, 2007

Dear Mr. Cleaves:

I am the current president of the Bluegrass Wildwater Association, an organization based in central Kentucky representing approximately two-hundred and fifty paddlers. This organization is involved nationally in whitewater access issues and has been an active organization for over thirty years.

Many of our members, myself included, have paddled the Chattooga River, particularly sections Three, Four and Overflow creek. The Chattooga River has always held a special place in the hearts and minds of central Kentucky paddlers, who rarely view a six hour drive as an obstacle to enjoying this valuable resource. The BWA is comprised of a wide range of paddlers, ranging from class five to flat water paddlers and further represents a broad spectrum of individuals from many walks of life, political persuasions, and interests.

The BWA is very interested in the outcome of this decision and would strongly urge the Forest Service to permit access to the headwaters for paddlers who are capable of enjoying some of the demanding stretches of whitewater available there. In our collective experience of paddling all over the globe, it is our belief that it would be a rare day when paddlers enjoying the upper head waters, would even see a person fishing, much less other individuals. As you know, that is typically because the better river flows for paddling are usually not the best areas for fishing/angling interests. I believe the Forest Services own assessment of that issue, bears that out.

I attended the informational hearing on June 18, 2007 and particularly appreciated Doug Whittaker's even-handed approach to the issue and thorough scholastic assessment

of issues raised, particularly by the paddling community and the fishing community. It seems clear that this "controversy" is one stemming from anglers' concerns that they will lose solitude. I have never seen this kind of conflict before and am puzzled by it, and believe strongly that this must be related to specific individuals with strong views and personalities as opposed to fishing interests in general.

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 limits 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,

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fish stocking, parking, total recreational use, angling use, hiking use, camping use, boating use, and swimming use.

No reasonable use of the head waters should be restricted and no user group should be completely eliminated solely due to the preferences of another user group. As I recall a slogan often seen through national forests, the national forest is a "Land of Many Uses". Whitewater paddling interests, with the substantial economic support it enjoys from a billion dollar industry, should be an appropriate user group represented in this process. Please consider that paddlers are a particular user group, known to be environmentally conscious and are active in outdoor recreation, and are extremely safety conscious, (many are certified in CPR and wilderness rescues and first aid). These persons are precisely the type of individuals that make an appropriate user group for this section of the National Forest. On behalf of the BWA I would urge you to open this world class river to paddlers.

I appreciate your attention to this matter. Please call if you have any questions.

Very truly yours,



J. Brent Austin
President of BWA

JBA/cr

670

Gay Kattel

From: "Gay Kattel" <gmkattel@msn.com>
To: <jcleeve@fs.fed.us>
Sent: Thursday, August 30, 2007 8:33 PM
Subject: Upper Chattooga River

pc

Forest Service Personal:

49 { I prefer that the Wild and Scenic designation of the Upper Chattooga River remain the same as it has been for the last 30 years. There are very few places in the Eastern half of the US that are preserved for foot traffic only. As a permanent resident of Macon County, NC I am very proud of the fact that we have such a scenic area nearby. For the safety of all concerned I think it would be risky to open such an unpredictable area to white water explorers. Our beautiful mountains are being attacked by many other factors. Please consider leaving The Upper Chattooga River as it was designated by our wise forefathers years ago.

66 {
Most sincerely,*Gay Kattel*

Gay Kattel

580 Edwards Creek Road
Highlands, NC. 28741

9/5/2007

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9/7/2007

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

Re: Chattooga Scoping Document

F { I find all of the alternates presented in the scoping document to contain unacceptable negative environmental impacts. Each alternate ignores a particular management issue. In addition each alternate ignores an unacceptable existing impact & solution documented in the User Capacity Study. It must be assumed that the "status quo alternate" would allow current violations of existing regulations to continue as that appears to be the "status quo" at this time. In that sense, each alternative allows unacceptable negative environmental impact to continue or bans a nationally & scientifically recognized low impact user group.

I { A User Capacity Study has been completed & paid for with tax dollars. The results & recommendations of this scientific study should be incorporated in the final management plan, not ignored. This study has stated boating would be a minimal impact use, less so than all existing allowed uses. The study has documented flow levels when there would be minimal interface with other users. It has stated where serious impact has occurred & recommended remedies. None of this impact has occurred from boating. Most of the impact has occurred because existing regulations were not enforced.

This issue is not as much about boating as it is about the responsible management of acceptable uses in a Wild & Scenic River corridor & a designated Wilderness Area. Currently there is no management, other than a boating ban, above Highway 28. The User Capacity Study documents abuses & the lack of enforcement of current regulations. Campsites within 50' of the high water line are particularly documented & are a violation of existing regulations

E { The Forest Service needs to focus on its mandate, which is the protection & management of the public lands in its care for the use & enjoyment of the citizens of this country. The Forest service mission statement is "Caring for the land and serving people". What is needed is a fair, unbiased plan, incorporating all acceptable user groups, regulating all allowed users and primarily focusing on the protection of the resource from further degradation. That plan should not pander to any particular user group, organization or individual, private or public. It will not please everyone, it can't & shouldn't. It should not place one user group's solitude or use above another's. It should remedy the existing damage, allow regulated use by all acceptable user groups & above all follow the Forest Service's own manual. What is not needed is pandering to any special interest groups, be it boating, angling or any other group. The plan should be professional, based on sound environmental principles, & available scientific data, not conflict avoidance or the desires of any special interest group.

118 { That protection & management should also address a major issue currently being ignored. The issue is the fact the river corridor above Norton Mill Creek is almost wholly in the hands of private landowners. This portion, which is the true headwaters, has no protection from development or degradation whatsoever under current management

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regulations or policy, but is within the Chattooga Wild & Scenic River Corridor. The Forest Service should actively pursue having this land within the Wild & Scenic River Corridor placed in conservation easements, conservation trusts or by other means available, protecting it for current & future generations. Streamside development of this private land will degrade downstream water quality for the entire length of the river. It will destroy the very nature of the Chattooga Wild & Scenic River Corridor.

As a citizen, I would prefer the following implemented:

- 1 < 1. Fires banned within the corridor & wilderness, except for emergency use.
- 1 < 2. Camping banned within 1/4 mile of any bridge. This will limit unacceptable impact at access points & enable severely impacted sites to recover to their natural state.
- 51 < 3. Overused campsites closed & rehabilitated.
- 51 < 4. Existing regulations enforced.
- 51 < 5. Closure of user created trails.
- 121 < 6. Self registration of all users enabling future monitoring of use levels.
- 122 < 7. Cessation of nonnative fish stocking. This will help minimize unacceptable impact at access points & the creation of user created trails alongside the riverbank.
- 1 < 8. Self propelled noncommercial boating allowed at levels above 2'2 on the Highway 76 gage.
- 1 < 9. Group size limitations for backcountry use.
- 1 < 10. No new roads, trails, parking lots or other user oriented development.
- 57 < 11. A plan focused on protection & preservation, unbiased against any qualified user group with user group limits based on environmental impact not on conflict.
- 118 < 12. Protective easements established through private lands to ensure the future health & preservation of the watershed in its unaltered natural state.
- 13. The continued monitoring & analysis of use & negative impact. Ongoing revisions based on unacceptable environmental impacts & overuse.

Thank you for the opportunity to comment & participate in this process. . However, it is not my responsibility to recommend management practices in National Forest lands, it is that of the Forest Service & its paid consultants. Please manage this fragile resource in the responsible, fair & scientific manner all others are managed through out the United States.

Sincerely,

George Hedrick
237 Kings Hwy
Decatur, GA 30030

- copy:
- Mike Johanns, Secretary of Agriculture
 - Mark Rey, Undersecretary of Agriculture, Natural Resources & Environment
 - Gail Kimball, Chief Forester, U.S. Forest Service
 - Chuck Myers, Southern Regional Forester, U.S. Forest Service
 - Jerome Thomas, Sumter National Forest Supervisor
 - Mary Sue Hilliard, Nantahala National Forest supervisor
 - Saxby Chambliss, U.S. Senate
 - Johnny Isakson, U.S. Senate
 - Hank Johnson, Georgia 4th District Congressional District

FRIENDS OF GEORGIA, Inc.

P.O. Box 870951
Stone Mountain, Georgia 30087

PHONE 404-375-8405 email - winfog@windstream.net

"DEDICATED TO PROTECTING GEORGIA'S NATURAL HERITAGE"



September 6, 2007

John Cleeves, Chattooga Project Coordinator
Sumter National Forest
4931 Broad River Road
Columbia, South Carolina 29212

Dear Mr. Cleeves,

49< I am writing to inform you that the Friends of Georgia (FOG) is **opposed** to plans to open up approximately twenty-one miles of the Chattooga River's headwaters to boating. This stretch has been closed to boats for more than thirty years, FOG feels the ban should remain in place. The Upper Chattooga, which bisects the Ellicott Rock Wilderness, remains one of the premier wild areas of the eastern United States, a refuge for wildlife, people, and is one of the best backcountry trout streams in the country.

20< FOG feels that opening the area to boaters, and their vehicles, would overwhelm a fragile resource and create conflicts with current visitors (hunters, hikers, anglers, photographers, birders, picnickers, naturalists, botanists, campers, swimmers, etc.) Whitewater boaters already have access to the majority of swift rapids nearby, including the West Fork of the Chattooga, and the entire 36 miles of the Lower Chattooga.

131< (D) FOG also feels a thorough Environmental Impact Statement is required to adequately study the issue and the impact of boating on the flora and fauna, much of it rare or unusual, in the corridor. The Forest Service's highest priority should be protecting the Upper Chattooga's existing biology, geology, history, and, especially, its solitude.

In closing, again, we are **opposed** to boating on the headwater's of the Chattooga River.

Sincerely,

Larry Winslett, President



Friends of Georgia is a member group of "the Stop I-3 Coalition", "Save America's Forests" and "the Endangered Species Coalition"

"The first rule of intelligent tinkering is to save all the pieces" Aldo Leopold
"Wilderness needs no defense...just needs more defenders." Edward Abbey

9/4/07

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Ranger John Cheeves:

I'm sure you are aware that we have a tremendous streams and rivers in our state (GA) that are polluted. I believe one of the reasons is that sediment from people and nature have created this serious problem.

131 { With all the rivers and streams for canoeing and boating we really don't need to allow another stream to be polluted by allowing more boating access.

44 { The forest service must protect our rivers and streams. I'm certainly against any new ^{access} ~~access~~ because new access would create more erosion and there are plenty of other places to canoe or boat.

21

Thanks for your consideration.

Tom Partington
Tom PARTINGTON
PO Box 1689

CLARKESVILLE, GA. 30523

tele: 706-754-7161

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DC

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

CC: Forest Supervisor Jerome Thomas
CC: Chief of U.S.F.S. Gail Kimball
1400 Independence Ave., SW
Washington, D.C., 20250-0003

Dear Forest Service Representatives,

I am writing concerning the management of the Sumter, Chattahoochee, and Nantahala National Forests, specifically the headwaters of the Chattooga Wild and Scenic River. Thank you for opening this process up, and for taking the time to read and consider the desires of the PUBLIC – the true owners of this land – in deciding how best to continue to manage the area.

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Realizing there are currently six options being offered for consideration, I can only support Option Number 6. There is no legal data that supports banning paddling on a Wild and Scenic River, and I cannot support any plan that disobeys the law and the guidelines set forth in U.S.F.S. regulations. I likewise cannot support the other alternatives that allow boating because I do not believe it is a wise use of U.S.F.S. funds, being somewhat tedious to manage. It is, however, a wise use of funding to have ALL user-groups self-permit, as that will allow Rangers to narrow down the area of a missing user – whether that user is hiking, boating, fishing, or doing any other activity – as well as provide ACTUAL usage data for future decisions.

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I'd like to also remind those who have the power to make this a better place for us and for generations to come that there are two things missing from the proposed plans – all of them – that those of us who have attended the meetings and workshops repeatedly have heard everyone there ask for in agreement: (1) increased signage at parking lots and trailheads educating visitors as to why it is important not to litter or create one's own trail. (2) Enforcement of current regulations concerning trails and litter.

Concerning those things, I'd like to suggest a program of users reporting abuse by other users. Contact information for local law enforcement or the Ranger Station in parking lots and at trailheads, signs encouraging people who witness litter and other abuse to report it, and prosecution of violators would begin to have a positive outcome and would be at significant less cost than additional rangers trying to patrol all areas all the time. Moving trails, campsites, and other erosion-causing activities a minimum from 50' from the river will aide the water quality (or at least slow the degradation), but it alone is not enough. Uneducated users will only create them again, the same as they have currently.

Please consider these things carefully when making decisions for those of us who wish to see the wilderness remain wild. Thank you again for your time.

Sincerely,

Michelle M. Miller
3 McBee Chapel
Mauldin S.C. 29662

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6 September 2007

John Cleeves
USDA Forest Service
4931 Broad River Rd.
Columbia, SC 29212-3520

Steven L. Powers, Ph.D.
221 Westwind Dr.
Ball Ground, GA 30107

Mr. Cleeves:

As a lifelong fisherman, whitewater boater for over 10 years, and aquatic biologist with 11 articles in peer-reviewed journals and 10 presentations at professional conferences, I believe that I am uniquely qualified to comment on the proposed changes to recreational opportunities in the upper Chattooga River.

Some of my earliest and most abundant childhood memories were of wading streams fishing for smallmouth and rock bass. My only encounter with a whitewater boater as a fisherman was in Elkhorn Creek near Lexington, KY. The Elkhorn is a creek that has boatable water levels from November through May in most years, has a difficulty level within the range of nearly all whitewater boaters, is heavily fished due to large fish populations, and is located within a 30 minute drive from the largest city in Kentucky. During this one and only encounter with a whitewater boater while fishing, the paddler and I exchanged greetings and he moved on immediately. The encounter lasted only a few seconds and in no way impacted my fishing success or overall experience for the day.

While I have never paddled the upper Chattooga, I understand that it is a small stream that is only likely to have boatable water levels following heavy rainfall. This would make for very few days each year that whitewater boaters would be interested in paddling the upper Chattooga. Although it is possible to fish following heavy rainfall, conditions certainly are not optimal due to increased turbidity, fish dilution, and increased drift in streams. High water conditions also make wading rocky, high-gradient streams more dangerous than normal water levels. This would make encounters between fishermen and whitewater boaters even less likely. Similar situations exist in the Conasauga River in northwest Georgia and Overflow Creek also in the Chattooga Drainage. I am unaware of any regular conflict occurring in either of these streams. In my nine boating trips on the Conasauga River, I have only seen two fishermen. Both of these encounters occurred during the lowest water level I have ever paddled the Conasauga, were brief, were friendly and created no problems for me or the fishermen.

The only stream I have ever paddled where regular encounters between boaters and fishermen occur is the Tellico River in Tennessee. The Tellico is a very popular put-and-take trout fishery, a popular tourist destination, has boatable water levels throughout winter and spring, has a difficulty level well within the skills of most whitewater boaters,

and is very accessible due to the road immediately paralleling the river. Few of these qualities are found in the upper Chattooga River.

125 < As an aquatic biologist, I see little potential for whitewater boating in the upper Chattooga to have substantial biological impacts. Paddlers generally access streams at bridges or established trails. Floating downstream in high water conditions means occasional encounters with large rocks in the streambed are the greatest impact whitewater boaters are likely to have on the upper Chattooga River. This compares very favorably to nearly any other recreational activity. While fishing, birdwatching or swimming are activities also unlikely to have negative biological impacts, walking for long distances along streams does have potential to erode streambanks.

134 < One situation cited as potentially problematic is the occasional removal of woody debris considered dangerous to whitewater boaters. Course woody debris is often cited as an important component of aquatic ecosystems (Allan 1995). While the role of course woody debris in lowland streams is well documented and due primarily to course woody debris providing the only stable physical habitat in rivers with shifting sand and silt substrates (Benke et al., 1985, Smock et al., 1989), course woody debris appears to play much less of a role in high gradient medium to large stream ecosystems (Powers et al. 2003). In upland streams, boulders are much more prevalent than in lowland streams and provide physical structure allowing for accumulation of leaf litter in the crevices and pools between boulders (Gregory et al. 1991). In lowland streams, course woody debris provides the only mechanism for capturing these vital organic components of aquatic food webs.

Much of the evidence linking the importance of course woody debris to high gradient streams is derived largely from the streams of Hubbard Brook Experimental Forest. The largest stream in the forest, Hubbard Brook, is only six linear miles when it leaves the experimental area as fourth order stream. Most of the well studied sub-basins are much smaller first or second order streams less than a mile in length (Fisher and Likens, 1973). For comparison, most whitewater streams are much larger with the Chattooga near Highway 28 being a fifth order stream having multiple forks and tributaries greater than 10 miles in length. As streams get larger, the importance of wood in stream ecosystems decreases (Gregory et al. 1991).

64 < Small woody debris (eg. twigs, branches, etc.) is also more important in streams than large woody debris (eg. logs, tree trunks) due to the formation of small sieves which capture leaf litter (Speaker et al. 1988). Small woody debris is unlikely to provide a threat to whitewater boaters and therefore isn't likely to be removed for safety reasons. Wood is also one of the slowest degrading organic materials in streams and appears to be a poor food source within streams due to the high levels of lignin (Allan 1995). 134 < Furthermore, any wood important to stream ecosystems would be submerged during normal flows and therefore far below the stream surface during high flow condition. Course woody debris far below the surface of the water poses no threat to whitewater paddlers and is unlikely to be removed. Any woody debris that may pose a danger to whitewater paddlers would be far above normal water levels and be even less important to stream ecosystems.

7 < Based on my experience as a fisherman, whitewater boater, and aquatic biologist, option number 6 appears to provide the greatest recreational opportunities for visitors to the upper Chattooga River without substantial negative impacts on the experience of

other visitors to this area or the biological integrity of the upper Chattooga River and surrounding forest. If you have any questions regarding this commentary or would like to discuss this matter further, please contact me at my office by phone (770) 720- 9220 or by email at SLP@reinhardt.edu.

Sincerely,



Steven L. Powers, Ph.D.
Assistant Professor of Biology
Reinhardt College
Waleska, GA 30183

Citations

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Allen Kirkwood
BWA Conservation Officer
404 Heddington Court
Versailles, KY 40383

form letter
145

September 7, 2007

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

Dear Mr. Cleeves:

I am currently the Conservation Officer of the Bluegrass Wildwater Association (hereinafter "BWA"), an organization based in central Kentucky representing approximately two-hundred and fifty paddlers. This organization is involved nationally in white water access issues and has been an active organization for over thirty years. Many of our members have paddled Chattooga River, particularly sections three, four and overflow creek. The Chattooga River has always held a special place in the hearts and minds of central Kentucky paddlers, who rarely view a six hour drive as an obstacle to enjoying this valuable resource. The BWA is comprised of a wide range of paddlers, ranging from class five to flat water paddlers and further represents a broad spectrum of individuals from many walks of life, political persuasions, and interests. Notwithstanding, the BWA is very interested in the outcome of this decision and would strongly urge the Forest Service to permit access to the headwaters for paddlers who are capable of enjoying some of the demanding stretches of white water available there. In our collective experience of paddling all over the globe, it is our belief that it would be a rare day when paddlers enjoying the upper head waters, would even see a person fishing, much less other individuals. As you know, that is typically because the better river flows for paddling are usually not the best area for fishing/angling.

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 the entire Upper Chattooga 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 front-country 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.

Whitewater paddling interests, with the substantial economic support it enjoys from a billion dollar industry, should be an appropriate user group for this section of the Chattooga River. As a group, paddlers represent some of the most environmentally conscious persons on the planet.

Mr. John Cleeves
September 5, 2007
Page 3 of 3

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Thank you for considering these ideas. I appreciate your attention to this matter.
Please call if you have any questions.

Respectfully,

A handwritten signature in cursive script that reads "Allen Kirkwood". The signature is written in black ink and is positioned above the printed name and title.

Allen Kirkwood
Conservation Officer

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September 6, 2007

JC

Mr. John Cleaves
Chattooga Project Coordinator
4931 Broad River Road
Columbia, S.C. 29212

Dear Mr. Cleaves:

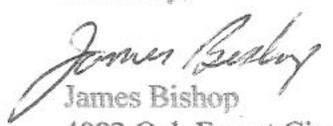
49 < I am submitting my comments regarding the Upper Chattooga River. Please note that I am against opening this section for boaters. I have been a volunteer for seventeen years at the Cohutta Wilderness District, Georgia. I was a member of some of the first canoeist expeditions that ran the river in the late 1960's.

131 < The Upper Chattooga, bisects the Ellicott Rock wilderness, which is one of the premier wild areas of the eastern United States, a refuge for wildlife, people and one of the best backcountry trout streams in the Country. Opening the area to boaters(and their vehicles) would overwhelm a fragile resource and create open conflicts with the current visitors(hunters, hikers, anglers, photographers, birders, picnickers, naturalists, botanists, campers, swimmers). Whitewater boaters already have ample and the majority of swift rapids nearby(Overflow and Holcomb creeks, the West fork of the Chattooga, and the entire 36 miles of the lower Chattooga.). An Environmental Impact Statement is required to adequately study the issue and the impact of boating on flora and fauna in the corridor.
D < New access(put in and take out points) offered to boaters would cause greater erosion into the river.
140 < The Forest Service must protect the Upper Chattooga's existing Outstandingly Remarkable Values of biology, geology, history, and, especially solitude.
64 < Dead trees that fall into the river-a key ingredient in the aquatic food chain(boaters like to cut and remove these trees to get them out of the way).

Sir, this is not worth it for a section that has enough water to run maybe 20 to 30 days out of the year. As a member that went through the Limits of Acceptable Change(LAC) on the Cohutta Wilderness, it's the initial impact that causes the most environmental damage. There are many rivers that canocist can run in this area.

Thank you,

Sincerely,


James Bishop
4082 Oak Forest Cir.
Marietta, GA 30062

679

DC

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

RE: Chattooga Scoping Document and public comments
Friday, September 07, 2007

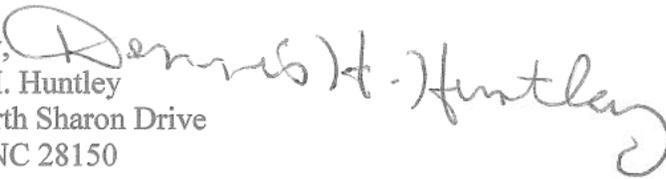
Dear Mr. Cleeves,

6 | I am a boater and fisherman on the Chattooga River, and I am not able to phrase my comments in the legal and technical terms that you probably need. I do need to tell you that common sense from my perspective tells me that not many boaters will be paddling the upper Chattooga, and those that do so on high water days will not impact fishing or any other user group in any way. As a fisherman, I cannot imagine going up there during a high water event when water is more turbid than usual with exceptionally strong currents and have any success fishing. There just will not be that many high water days on the upper Chattooga and there are a relatively small numbers of paddlers who have the skill to really enjoy paddling there. (You have the data about yearly high water events and the numbers of expert paddlers who will be using the river, I hope, as I am sure your data will confirm what I am saying.) I am 61 years old, and I still have the skills to paddle the upper Chattooga at this point, but I also am very pragmatic, and have no doubt that I will ever get the opportunity to paddle it in my lifetime due to the foot dragging of the Forest Service.

1 | I urge you to rewrite your suggested plans to give paddlers and other potential river users at least the access to the river that they have on section three and four. I appreciate your stewardship of the National Forest Service land and rivers, but please, please strike a public minded balance in your oversight and do not "over-manage" the river for any user group.

Thank you.

Sincerely,
Dennis H. Huntley
1408 North Sharon Drive
Shelby, NC 28150



680

Form letter
145

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,

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 limits 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, [Mark Anthony Daniels]

Sept. 06, 2007

Mark A. Daniels

681

DC

John Cleeves, Chattooga Project Coordinator
Sumter National Forest
4931 Broad River Road
Columbia, South Carolina 29212

Dear Mr. Cleeves:

49 < I would like to register my total opposition to opening up the 21 miles of the Chattooga Wild and Scenic River headwaters to boating.

This Chattooga headwaters area is one of the few remaining unspoiled wild and scenic areas in the Southeast. It should be left the way it is, minimizing the damage that will surely be done if more humans are allowed to run rampant over the this fragile resource.

131 < It isn't as if whitewater boaters don't have plenty of rapids all around this area. They don't need this too. Leave it to the lovers of nature - the gentle hikers, campers, fisher folk, birders, fish, wildlife, etc. They are all very important too.

D < I don't think you've even done an environmental impact statement of the impact of your proposal yet, so how can you even be considering the possibility of such damage?

Leave it just the way it is, protect it completely as it is at this moment - don't let the boaters in to pollute, tear up, and run over this incomparable wilderness area.

Sincerely,

Katherine J. Meyers

Katherine J. Meyers
3840 Savannah Square W
Atlanta GA 30340

Phyllis H. Miller
2394 Leafgate Road
Decatur, GA 30033
Phone: (404) 636-1412
E-mail: phylmil14@bellsouth.net
September 7, 2007

682
DC

John Cleeves, Chattooga Project Coordinator
Sumter National Forest
4931 Broad River Road
Columbia, South Carolina 29212

Dear Sir:

The U.S. Forest Service is considering opening up 21 miles of the Upper Chattooga River's Wild and Scenic headwaters to boating.

98 < Opening this area to boaters (and their vehicles) would overwhelm a fragile resource and create open conflict with current visitors (hunters, hikers, anglers, photographers, birders, picnickers, naturalists, botanists, campers, swimmers, etc.)

27
114 < The Forest Service must protect the Upper Chattooga's existing Outstandingly Remarkable Values of biology, geology, history, and, especially, solitude.

This stretch has been closed to boats for the past 30-plus years – and I believe the ban should remain in effect.

49 < Please keep the ban on boating on this Wild and Scenic River's headwaters.

Sincerely,

Phyllis Miller, citizen!

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

683

Form letter

145

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.

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- 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,

A handwritten signature in black ink that reads "J.K. Woods". The signature is written in a cursive style with a long, sweeping underline.

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

684
DC
From letter
145

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.

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- 5 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.
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- 8 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,
Anita Pinner
1525 Rock Springs Rd
Warrior, AL 35180
205 647 9433

A handwritten signature in black ink, appearing to be 'Anita Pinner', with a stylized flourish at the end.



United States
Department of
Agriculture

Forest
Service

Francis Marion &
Sumter National Forests

4931 Broad River Road
Columbia, SC 29212-3530
(803)561-4000

File Code: 1920-2

Date: August 14, 2007

685
DL

Dear Interested Party:

On behalf of the Sumter, Chattahoochee and Nantahala National Forests, I am asking for your comments on alternatives for managing recreation uses on the upper Chattooga River, including the alternative of maintaining the current management direction. In compliance with the National Environmental Policy Act (NEPA), we will prepare an Environmental Assessment to determine whether or not there are significant environmental effects that would require an Environmental Impact Statement. I would appreciate your comments on potential environmental effects of the alternatives and on the range of alternatives.

Based on data from the visitor use capacity analysis and on information gathered during a series of public hearings and workshops, I have developed six preliminary alternatives that cover a range of options from maintaining current management to introducing new boating use to implementing restrictions on all users. Enclosed is a table outlining the differences between each alternative.

Please send your comments via e-mail to comments-southern-francismarion-sumter@fs.fed.us or via surface mail to John Cleeves at the address above. All submitted comments will become part of the project record and available for public review. In addition, you are invited to attend a workshop on the alternatives that we will convene on September 29, 2007. Time and location information will soon be posted on the Forest web site. In order for your comments to be adequately considered prior to the workshop, please send them in by September 13, 2007.

For more information on this process, please visit our website at <http://www.fs.fed.us/r8/fms>.

Sincerely,

/s/ Jerome Thomas
JEROME THOMAS
Forest Supervisor

Enclosures

DEAR MR CREEVES,
THANK YOU FOR THE TIME AND EFFORT
WHICH HAS GONE IN TO THIS STUDY. AFTER HAVING
READ AND STUDIED THIS I STILL SEE NO REASON TO
CHANGE THE EXISTING REGULATIONS. THIS IS A UNIQUE
AREA. IT IS RELATIVELY CLEAN. THERE IS LITTLE DISRUPTION.
KAYAKS WILL BRING OTHER BOATERS AND FLOATERS.
THERE WILL BE CONFLICTS. THERE WILL BE DEMAND FOR
ADDITIONAL TRAILS AND ENTRY POINTS THIS WILL DISCOURAGE
VISITORS TO THIS UNIQUE FISHING EXPERIENCE.
THE EXISTING REGULATIONS WORK WELL.
THERE ARE NO DECISIONS ON FLOW RATES, ETC.
IT IS EASILY MONITORED - THE REGS ARE CLEAN.
PLEASE MANAGE THIS SPECIAL AREA
SINCERELY,
STEVE RAEBER
LAKEMONT, GA



Caring for the Land and Serving People

Printed on Recycled Paper



Alternatives

Throughout this process, the public has expressed agreement on their desire to protect and enhance the outstandingly remarkable values of the Chattooga River (geology, biology, scenery, recreation and history); maintain a sense of solitude away from modern life; offer a remote wilderness experience; preserve the spectacular scenery and setting; and protect the natural resources of the upper section of the Chattooga Wild and Scenic River that make this area a special and unique place. In the NEPA process, these goals collectively are called a "desired condition."

Issues related to how to achieve this desired condition include:

1. Should there be new standards limiting trailheads, trails and/or campsites?
2. Should there be new standards limiting group sizes, encounters between user groups and/or access?
3. Should there be new boating opportunities on the Chattooga River?
4. Should there be new standards limiting group sizes, encounters between user groups and/or access if new boating opportunities are allowed?

Our publics have expressed many different ways of responding to these issues while achieving the desired condition. The following six preliminary alternatives reflect what the Forest Service has heard thus far. Site specific analyses would need to be completed prior to implementing some of the actions presented in these alternatives.

My First Come
UNIQUE AREA, EXPERIENCE > 2

#1	Maintain Current Management Standards/Actions
<i>Boating</i>	<ul style="list-style-type: none"> Floating on the Chattooga River is not allowed upstream of the Highway 28 bridge.
<i>Group size</i>	<ul style="list-style-type: none"> 12 Within existing wilderness areas the commercial and organized group size is limited to 12.
<i>Trails</i>	<ul style="list-style-type: none"> New non-motorized trail construction is allowed to improve existing trail configuration and to improve access to specific locations along streams, lakes, and the riparian corridor. Motorized and non-motorized trail reconstruction and relocation within the riparian corridor are allowed to reduce impacts to riparian and aquatic resources.
<i>Woody debris</i>	<ul style="list-style-type: none"> Perennial and intermittent streams are managed in a manner that emphasizes and recruits large woody debris. The desired condition is approximately 200 pieces of large woody debris (LWD) per stream mile. The removal of large woody debris (pieces greater than 4 feet long and 4 inches in diameter on the small end) is allowed if it poses a risk to water quality, degrades habitat for riparian-dependent species, for recreational access, or when it poses a threat to private property or National Forest infrastructures (i.e. culverts, bridges). The need for removal must be determined on a case-by-case basis. Except in unusual circumstances, woody debris embedded within the channel materials will not be removed.
<i>Campsites:</i>	<ul style="list-style-type: none"> Dispersed camping occurs at least 50 feet from lakes and streams to protect riparian areas, 50 feet from trails and ¼ mile from a road on the Andrew Pickens District. Mitigate resource damage at existing campsites.

ONLY TO REMOVE IMPACT

GOOD

IMPACTS > 64

#2	
Objective	<ul style="list-style-type: none"> • Primary objective is to manage encounters among existing users.
	Standards/Actions
<i>Boating</i>	<ul style="list-style-type: none"> • No boating above the Highway 28 bridge. !
<i>Group Encounters</i>	<ul style="list-style-type: none"> • No more than three encounters per day except within 300 feet of Burrell's Ford Bridge.
<i>Group size</i>	<ul style="list-style-type: none"> • Limited to 12.
<i>Trails</i> <i>Good</i>	<ul style="list-style-type: none"> • Designate existing user-created trails except where resource damage can't be mitigated (those trails would be closed). • No new trail construction unless a reroute is necessary to correct existing problems on designated trails. • No new user-created trails.
<i>Woody debris</i>	<ul style="list-style-type: none"> • Enhance woody debris recruitment.
<i>Campsites: Wilderness & wild segments</i>	<ul style="list-style-type: none"> • Designate existing campsites except where resource damage can't be mitigated (those campsites would be closed). • Camping in designated campsites only. • No new user-created campsites. • Limit user-created fire rings. • No more than one campsite per ¼ mile of river.
<i>Campsites: Recreation and scenic segments</i>	<ul style="list-style-type: none"> • Campsites limited to 50 feet from the river, 50 feet from trails, 200 feet from an occupied campsite and 300 feet from an open public road. • Mitigate resource damage at existing campsites.
<i>Parking</i>	<ul style="list-style-type: none"> • No parking lots inside the Corridor boundary (close existing parking lots if necessary). Lost parking spaces will not be replaced. <i>NOT NECESSARY</i>
<i>User registration</i>	<ul style="list-style-type: none"> • Self-registration for all users/visitors (not fees). • Capacity will be monitored. If more than three encounters occur per day, a permitting system will be implemented for all existing users.

#3	
Objective	<ul style="list-style-type: none"> Primary objective is to manage biophysical impacts on natural resources by limiting trails, campsites, group size, parking and types of use (prohibition on boating would continue). <i>Good</i>
	Standards/Actions
<i>Boating</i>	<ul style="list-style-type: none"> No boating above the Highway 28 bridge. ✓
<i>Group Size</i>	<ul style="list-style-type: none"> Limited to 12.
<i>Trails</i>	<ul style="list-style-type: none"> Designate existing user-created trails except where resource damage can't be mitigated (those trails would be closed). No new trail construction unless a reroute is necessary to correct existing problems on designated trails. No new user-created trails. <i>OK</i>
<i>Woody debris</i>	<ul style="list-style-type: none"> Enhance woody debris recruitment.
<i>Campsites: Wilderness & wild segments</i>	<ul style="list-style-type: none"> Designate existing campsites except where resource damage can't be mitigated (those campsites would be closed). Camping in designated campsites only. No new user-created campsites. Limit user-created fire rings.
<i>Campsites: Recreation and scenic segments</i>	<ul style="list-style-type: none"> Campsites limited to 50 feet from the river, 50 feet from trails, 100 feet from an occupied campsite and 300 feet from an open public road. Mitigate resource damage at existing campsites.
<i>Parking</i>	<ul style="list-style-type: none"> No net gain in parking capacity. <i>OK</i>

#4	
Objective	<ul style="list-style-type: none"> Primary objectives: To manage biophysical impacts on natural resources and encounters between users by limiting trails, campsites, group size and parking; and to manage encounters between users by establishing zone, season and flow limits on new boating opportunities.
	Standards/Actions
<i>Boating below private property to Bull Pen Road Bridge</i>	<ul style="list-style-type: none"> Boating limited to single-capacity hard boats and single-capacity inflatable kayaks. No season or flow restrictions for boating from the existing user created trail stemming from the Chattooga River Trail (approximately 4/10 mile below private land on the west side of the river) to Bull Pen Road Bridge. Maximum four groups per day (self-registration only until records indicate the maximum number of groups is exceeding four; then permits in advance). Maximum group size of six people.
<i>Boating from Bull Pen Road Bridge to ¼ mile above Burrells Ford Bridge</i>	<ul style="list-style-type: none"> Boating limited to single-capacity hard boats and single-capacity inflatable kayaks. Seasonal and flow restrictions for boating between Bull Pen Road Bridge and ¼ mile above Burrells Ford Bridge <ol style="list-style-type: none"> Allows boating December 1 – March 31 Allows boating at flows equivalent to 400 cfs (at Burrells Ford gage) or approximately 2.4 feet (HWY 76 gage) and above only. Maximum four groups per day (self-registration only until records indicate the maximum number of groups is exceeding four; then permits in advance). Maximum group size of six people.
<i>Group size</i>	<ul style="list-style-type: none"> Limited to 12.
<i>Woody debris</i>	<ul style="list-style-type: none"> Limited woody debris removal.
<i>Trails</i>	<ul style="list-style-type: none"> Designate existing user-created trails except where resource damage can't be mitigated (those trails would be closed). No new trail construction unless a reroute is necessary to correct existing problems on designated trails. No new user-created trails.
<i>Campsites: Wilderness & wild segments</i>	<ul style="list-style-type: none"> Designate existing campsites except where resource damage can't be mitigated (those campsites would be closed). Camping in designated campsites only. No new user-created campsites. Limit user-created fire rings.
<i>Campsites: Recreation and scenic segments</i>	<ul style="list-style-type: none"> Campsites limited to 50 feet from the river, 50 feet from trails, 100 feet from an occupied campsite and 300 feet from an open public road. Mitigate resource damage at existing campsites.
<i>Parking</i>	<ul style="list-style-type: none"> No net gain in parking capacity.
<i>User registration</i>	<ul style="list-style-type: none"> Self-registration for all users/visitors (not fees).

How to Monitor, Enforce ?
BAD IDEA

- CONFLICT WITH DELAYED NAVIGATIONS

#5	
Objective	<ul style="list-style-type: none"> Primary objectives: To manage biophysical impacts on natural resources and encounters between users by limiting trails, campsites, group size and parking; and to manage encounters between users by establishing zone and flow limits on new boating opportunities.
	Standards/Actions
<i>Boating between Grimshawes Bridge and Lick Log</i>	<ul style="list-style-type: none"> At flows equivalent to 350 cfs (at Burrells Ford gage) or approximately 2.3 feet (HWY 76 gage) and above only. Boating limited to single-capacity hard boats and single-capacity inflatable kayaks. Maximum four groups per day (self-registration only until records indicate the maximum number of groups is exceeding four; then permits in advance) between Grimshawes and Burrells Ford. Maximum four groups per day (self-registration only until records indicate the maximum number of groups is exceeding four; then permits in advance) between Burrells Ford and Lick Log Creek. Maximum group size of six people.
<i>Group size</i>	<ul style="list-style-type: none"> Limited to 12.
<i>Woody debris</i>	<ul style="list-style-type: none"> Limited woody debris removal.
<i>Trails</i>	<ul style="list-style-type: none"> Designate existing user-created trails except where resource damage can't be mitigated (those trails would be closed). No new trail construction unless a reroute is necessary to correct existing problems on designated trails. No new user-created trails.
<i>Campsites: Wilderness & wild segments</i>	<ul style="list-style-type: none"> Designate existing campsites except where resource damage can't be mitigated (those campsites would be closed). Camping in designated campsites only. No new user-created campsites. Limit user-created fire rings.
<i>Campsites: Recreation and scenic segments</i>	<ul style="list-style-type: none"> Campsites limited to 50 feet from the river, 50 feet from trails, 100 feet from an occupied campsite and 300 feet from an open public road. Mitigate resource damage at existing campsites.
<i>Parking</i>	<ul style="list-style-type: none"> No net gain in parking capacity.
<i>User registration</i>	<ul style="list-style-type: none"> Self-registration for all users/visitors (not fees).

No Dispersal to 76
 No Dispersal to 76
 60

#6	
Objective	<ul style="list-style-type: none"> • Primary objectives: To manage biophysical impacts on natural resources and encounters between users by limiting trails, campsites, group size and parking; and to provide new boating opportunities.
Standards/Actions	
<i>Boating between Grimshaws and Highway 28 Bridges</i>	<ul style="list-style-type: none"> • Boating limited to single-capacity hard boats and single-capacity inflatable kayaks. • Maximum group size of six people.
<i>Group size</i>	<ul style="list-style-type: none"> • Limited to 12.
<i>Woody debris</i>	<ul style="list-style-type: none"> • Limited woody debris removal.
<i>Trails</i>	<ul style="list-style-type: none"> • Designate existing user-created trails except where resource damage can't be mitigated (those trails would be closed). • No new trail construction unless a reroute is necessary to correct existing problems on designated trails. • No new user-created trails.
<i>Campsites: Wilderness & wild segments</i>	<ul style="list-style-type: none"> • Designate existing campsites except where resource damage can't be mitigated (those campsites would be closed). • Camping in designated campsites only. • No new user-created campsites. • Limit user-created fire rings.
<i>Campsites: Recreation and scenic segments</i>	<ul style="list-style-type: none"> • Campsites limited to 50 feet from the river, 50 feet from trails, 100 feet from an occupied campsite and 300 feet from an open public road. • Mitigate resource damage at existing campsites.
<i>Parking</i>	<ul style="list-style-type: none"> • No net gain in parking capacity.
<i>User registration</i>	<ul style="list-style-type: none"> • Self-registration for all users/visitors (not fees).

	Standards/Actions	#1	#2	#3	#4	#5	#6
<i>Encounters</i>	No more than three per day except within 300 feet of Burrells Ford Bridge.						
<i>Group Size</i>	Limited to 12.						
<i>Boating</i>	No boating above HWY 28 <i>AGREE</i>						
	Single-capacity hard boats/inflatable kayaks only.						
	Flow restrictions between Grimshawes and Lick Log.						
	No boating adjacent to private property.						
	Below private land to 1/4 mile above Burrells Ford Bridge with some season and flow restrictions.						
	Maximum four groups per day above Burrells Ford Bridge						
	Maximum four groups per day below Burrells Ford Bridge						
	Maximum group size of six people						
<i>Trails</i>	Designate existing user-created trails except where resource damage can't be mitigated.						
	No new trail construction unless a reroute is necessary to correct existing problems on designated trails.						
	No new user-created trails.						
<i>Woody Debris</i>	Enhance woody debris recruitment.						
	Limited woody debris removal.						
<i>Campsites: Wilderness and Wild Segments</i>	Designate existing campsites except where resource damage can't be mitigated						
	Camping in designated campsites only.						
	No more than one campsite per 1/4 mile of river.						
	No new user-created campsites.						
<i>Campsites: Recreation and scenic segments</i>	Limit user-created fire rings.						
	Campsites limited to 50 feet from the river, 50 feet from trails, 100 feet from occupied campsites and 300 feet from open public roads.						
	Mitigate resource damage at existing campsites.						
<i>Parking</i>	Campsites limited to 50 feet from the river, 50 feet from trails, 200 feet from an occupied campsite and 300 feet from an open public road.						
	No parking lots inside the Corridor Boundary. Parking spaces will not be replaced.						
<i>User registration</i>	No net gain in parking capacity.						
	Self registration for all users/visitors (not fees). Monitor capacity. If more than three encounters per day occur, a permitting system will be implemented for all users.						