

Oconee River Chapter of Trout Unlimited

Joshua Trey Barnett, President and CEO
4293 New Kings Bridge Road
Nicholson, GA 30565

686
DC

September 6, 2007

Mr. John Cleeves
USDA Forest Service
Sumter National Forest
4391 Broad River Road
Columbia, S.C. 29212

RE: Upper Chattooga River Visitor Capacity Analysis Scoping Notice

Mr. Cleeves:

I am writing in response to your Aug. 14, 2007, request for comments on the suggested alternatives for management of the Upper Chattooga River.

The Oconee River Chapter of Trout Unlimited's (ORCTU) mission is to *conserve, protect and restore the coldwater fisheries of North Georgia and their watersheds*. We believe that the management prescription for the Upper Chattooga River that the United States Forest Service selects will determine how successfully the management of the Upper Chattooga River will align with ORCTU's mission.

The scoping notice asks four questions, detailed below with our responses:

1. Should there be new standards limiting trailheads, trails and/or campsites? Yes.

26 < The proliferation of user-created trails and campsites will increase erosion and damage to trees and other vegetation. Many existing campsites violate the current policies regarding proximity to streams and trails. Enforcement of the proper regulations is the key to ensuring negative damage from these user-created resources ceases without further damage to the Upper Chattooga River and the surrounding riparian zone.
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2. Should there be new standards limiting group sizes, encounters between user groups and/or access? Before we are able to confidently answer this question, we

5 < suggest that more quantitative information on major user-groups be presented. Like many outdoor recreational facilities, a self-registration system would provide accurate visitation data. If new user-groups were to be added, boating for example, new standards would be necessary.
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3. Should there be new boating opportunities on the Chattooga River? No. Boating is already permitted on two-thirds of the river, and the negative impact of permitting boating on the upper one-third of the Chattooga River outweigh the, if any, benefits of allowing this user-group unlimited access. We are not aware of any compelling argument as to how increased boating will benefit the river or wilderness.
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4. Should there be new standards limiting group sizes, encounters between user-groups and/or access if new boating opportunities are allowed? Yes.

The reintroduction of boaters as a user-group to the upper one-third of the Chattooga River would have a negative impact on the river and the wilderness. If permitted access, boaters would cover more of the length of the river corridor than any other user-group, increasing encounters, particularly with anglers and swimmers. Because of the river's narrowness, avoidance of said encounters would be impossible. Strict and presumably costly standards and enforcement would be required to reduce encounters and to preserve the solitude and tranquility enjoyed by current user-groups.

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Six alternatives for the management of the Upper Chattooga River have been presented. Our commentary in regards to each is below.

Alternative #1: This is the current management plan that has been in place for over 30 years. We believe this plan has been successful in maintaining the outstanding and remarkable values of the Upper Chattooga River and fully support the continuation of this plan, with the recognition that improvements to better prepare the Upper Chattooga River for increased visitation and local population growth should be made. We do not feel that the upper one-third of the Chattooga River should be opened to boating and have yet to hear a valid argument as to why the United States Forest Service should do so.

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Alternative #2: For the most part, we support this plan which will assist in social issues management; however, we do not feel that extreme changes, such as removing parking lots is acceptable since it would deter older or less capable citizens from using the river. Restricting the number of parking spaces and utilizing proper enforcement methods, however, may be sufficient for the foreseeable future.

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Alternative #3: This alternative would reduce erosion and other damage to vegetation, and it is aligned with the suggestions made previously to the current management plan (Alternative #1). We would support this alternative.

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Alternative #4: This alternative introduces boating on a limited reach of the river in North Carolina, and adds management prescriptions to mitigate the impacts of the new user- group. We have yet to hear a compelling argument as to how introducing boating will benefit the biological, physical, aesthetic and social aspects of the river. Introducing an additional user-group, especially one that currently has rights to utilize two-thirds of the river, would be detrimental to these aspects. We accept the fact that limiting boating to the winter months would minimize encounters with one user group (anglers) in this reach, and support that proposal. However, *in toto*, allowing boating would be a net loss for the river and current users, and we cannot accept this alternative.

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Alternative #5: This alternative would allow boating on the uppermost half of the Chattooga River. We dismiss this alternative noting that boating would not contribute to the biological, physical, aesthetic or social values of the river.

1 < • The proposed water level at which boating is allowed (2.3 ft. at the U.S. 76 Bridge) is much too low. At that level, the river is still very much accessible to anglers, and an unacceptable number of angler/boater encounters would ensue. This reach of the river is narrower and shallower in the upstream reaches, and is a preferred option to the lower reaches when water levels there are uncomfortable for anglers. This alternative would focus use by the two groups in a more limited area, to the detriment of both user groups. A much higher water level cutoff for boating is needed to reduce encounters to an acceptable level.

114 < • Intrusion into a region of wilderness that is not currently accessible by roads or trails. The USFS has not chosen to extend the current riverside trails from Ellicott Rock north or from Bull Pen Bridge south. This has created an undisturbed wildlife and plant sanctuary that would be disrupted by essentially creating a new trail (a water trail) through the heart of the area. This may in fact violate the principles of the Wilderness Act.

64 < • Removal of woody debris in the river should be very limited, should be done by USFS personnel or with their supervision and should not be done solely for recreational access. Recruitment of woody debris is the preferred condition. (See paragraph below for more commentary.)

45 < • A maximum of four groups per day of six boaters each (24 boaters per day) is too high a number, and needs to be reduced.

18 < Because of these concerns, we find this alternative unacceptable.

19 < **Alternative #6:** This alternative would permit unlimited boating throughout the Upper Chattooga River and offers mitigations for the impact. This alternative is unacceptable because:

• It will cause a serious degradation in social values: large number of encounters, likely arguments between users, excessive traffic and crowding at access points, and displacement of current users. This is the same pattern that has occurred below the S.C. 28 Bridge over the past 30 years, and should not be allowed to happen in the upper portion of the river.

64 < • Negative biological impacts will result, including change in fish behavior resulting in poorer fishing experience, additional trampling of bank-side vegetation at portage points, increased erosion and subsequent siltation to the detriment of fish and other aquatic life, and loss of nutrient input from large woody debris as result of removal by boaters.
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- It will result in excessive degradation of biophysical features caused by portage trails, increased traffic at access points, increased erosion of banks and removal of large woody debris.
- It will degrade the aesthetic values, solitude and tranquility of the river corridor. Small boat kayaking is an adventure sport, and by its very nature is at odds with the outstanding and remarkable values currently protected on the Upper Chattooga River.

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Commentary on Large Woody Debris and Removal: Many aquatic species rely on natural accumulations of trees, branches and root wads known as large woody debris. The limited woody debris removal allowed in alternatives 4, 5 and 6 is a standard that could result in biophysical degradation in segments of the North Fork of the Chattooga River and its tributaries. Large woody debris has incredible ecological importance in river systems. For decades, many insensitive boaters have made a practice of removing the large woody debris that hinders their passage in headwater streams, such as the Chattooga's West Fork and Overflow Creek headwaters.

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Commentary on Compliance: Alternatives 4, 5 and 6

- *Compliance with the Wild and Scenic Rivers Act:* There is no credible evidence that adding boating recreation to the North Fork will protect and enhance its backcountry outstanding and remarkable values of solitude and remoteness for present and future generations as required by the Wild and Scenic Rivers Act.
- *Compliance with the Wilderness Act:* There is no credible evidence that adding boating recreation to the Ellicott Rock Wilderness will not diminish the outstanding opportunities for solitude or assist in securing an enduring resource of wilderness for present and future generations as required by the Wilderness Act.
- *Compliance with the Decision for Appeal:* Diverse whitewater boating opportunities exist on 63 percent of the length of the Chattooga River and all other streams on all surrounding National Forests. However, the North Fork is the only segment of a backcountry Forest Service stream in the southeast zoned for foot travel only, a unique resource deserving of protection for present and future generations. There is absolutely nothing in the Wilderness Act and/or the Wild and Scenic Rivers Act that says all activities must be permitted in all segments of the river.

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Commentary on Stewardship: Zoning ensures that different types of users are physically separated. Zoning of conflicting activities is good stewardship. Stewardship encompasses far more than picking up litter; it includes the protection of the aesthetic values of natural resources such as remoteness and wildness, the proper regard for the rights of others to solitude and the responsibility of preserving these values intact for future generations. Alternatives 1, 2 and 3 do exactly that. Alternatives 4, 5 and 6 do not.

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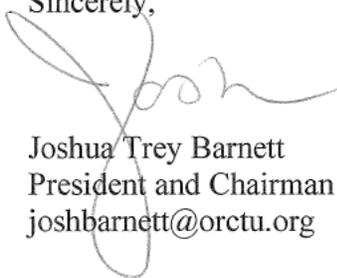
Overall, we feel that alternatives 1, 2 and 3 are most closely aligned with the mission of the Oconee River Chapter of Trout Unlimited—*conserving, protecting and restoring the coldwater fisheries of North Georgia and their watersheds*. However, alternatives 4, 5 and 6 would have adverse affects on the Upper Chattooga River’s outstanding and remarkable values.

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Please consider choosing Alternative #1 or a blended strategy incorporating portions of alternatives 1, 2 and 3. These plans would help ensure the perpetuation of the aesthetic values (solitude, remoteness, wildness, protecting endangered experiences, psychological, etc.) and social values (encounters, user conflicts, interference with activities such as angling, bird watching, wildlife viewing, the rights of others to solitude, etc.). We would like future generations to have the opportunity to enjoy peace and solitude in this magnificent wilderness and rely on your team to choose a new plan or perpetuate the existing plan such that this hope will become a reality.

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Sincerely,



Joshua Trey Barnett
President and Chairman of the Board
joshbarnett@orctu.org

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Mr. & Mrs. W. Gary Turnley
P.O. Box 245
Cashiers, NC 28717

6087
September 6, 2007
DC

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

Dear Mr. Cleeves:

49 < The purpose of this letter is to provide public input on managing recreation uses on the Chattooga River. We favor the maintenance of existing management. We favor the current course of management which allows boating below the highway 28 bridge and places some limits on group sizes, trails and campsites. We believe in the old adage, "If it ain't broke, don't fix it." The present system works and it works well.

We are opposed to all forms of boating above the highway 28 bridge for the following reasons:

21 < 1. Recently we have hiked several sections of the Chattooga River Trail above highway 28 and have noticed numerous large trees, some up to three feet in diameter, spanning the entire river. In several locations there are three or four trees together. This would make it necessary for any boater to portage around these numerous blockages. The banks in these areas are steep and support thick vegetation. Not only would it be difficult to climb up one bank and down another while carrying a canoe, kayak or raft but it is also dangerous because it is so easy to slip and fall and break a leg or worse. All this portaging will cause erosion of the banks allowing dirt and sediment to foul the pristine Chattooga. The solution would be for the Forest Service to clear all these trees from the river, but this is an extremely formidable task for which no money is budgeted.

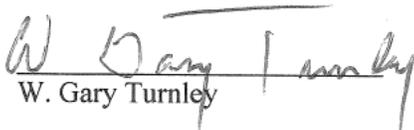
131 < 2. We have enjoyed several guided Chattooga rafting trips below highway 28 and feel there is presently ample opportunity for boating below highway 28. The Chattooga should provide something for everyone. Not only should there be opportunity for boaters to enjoy the river, but there should also be opportunity for a truly wilderness experience. There are many outdoorsmen such as hikers, campers and those who enjoy fly fishing that seek a truly remote wilderness experience and want to preserve the scenery and setting of the river. They enjoy quiet and solitude and not the commotion and noise from large groups of boaters. In fact on the upper Chattooga it is virtually impossible to do any real fly fishing when boaters are present.

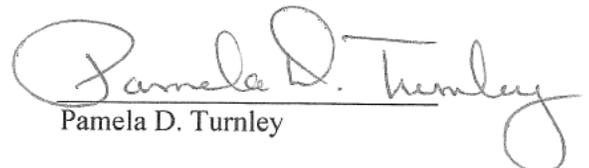
85 < 3. Lastly there is an important difference between boating and those who enjoy hiking, camping and fishing. That difference is commercialism and the profit motive. The majority of boaters are on guided trips provided by outdoor outfitters who are making a monetary profit from our national forests, while the majority of hikers, campers and fishermen are individuals not making a monetary profit from our national forests. It should not be the purpose of our national forests to insure that commercial interests make a profit.

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Thank you for the fine job you are doing and for considering our opinion.

Yours truly,


W. Gary Turnley


Pamela D. Turnley



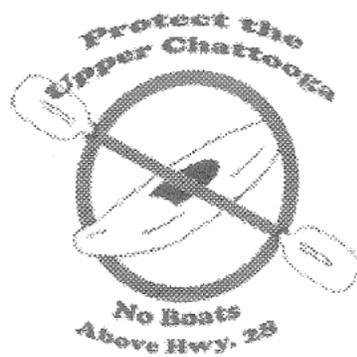
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PROTECT THE CHATTOOGA HEADWATERS

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 backcountry fishing are incompatible on smaller rivers. The Upper Chattooga should remain wild for fishermen, for hiking, and other uses on which floating is an intrusion. Opening the upper Chattooga to floating would bring immediate pressure to further develop this wild country into another exclusive franchise for the highly profitable rafting companies. Keep the headwaters portion of the wild and scenic Chattooga unspoiled.

<u>NAME</u>	<u>ADDRESS</u>
<i>[Signature]</i>	11709 Selwick Dr. Wkndmanor 34786
P.M. Brand	159 Hidden Springs Rd Highlands, NC 28741
Barbara Jean	" " " " " "
<i>[Signature]</i>	2248 Partridge Way CHS SC 29407
KATE WYLLY	2248 Partridge Way Charlotte SC 29407
JAMES LONG	207 Summer Rest Rd Wilmington NC 28405
<i>[Signature]</i>	1764 West Wesley Rd ATLANTA, GA 30327
Carol Hix	693 Grandview Ridge Cashier 28717
Andy Ush	5 Lakewood Dr Newnan GA 30263
David Kessner	210 Stillman's Circle Cashier, N.C. 28717
Deane Howers	33 Lexington Rd Richmond, Va 23226
William Marscher	39 Wildwater Rd H. ITonland IS SC 29426
Amelia Gordon	4994 Dobbs Crossing Marietta 30068 GA
Carolyn Hajek	7710 Dunvegan Close Atlanta GA 30350
Sally Wolfe	3219 Sancy Ridge Dr Clearwater FL 33761
Kimberly Kee	747 Saddle Creek Pl Sny FL 34241
<i>[Signature]</i>	1106 Frances Ave Nashville TN 37204
<i>[Signature]</i>	902 E. WASHINGTON ST, GREENVILLE, SC 29601
William Reed	3513 ALTA BROOK DR. Bham 35243
<i>[Signature]</i>	1738 Faraway Dr Lake Tostaway 28747
<i>[Signature]</i>	105 Clarendon Ave Nashville TN 37205
Robert Pless	2905 Carlisle Rd B'ham AL 35213
Darren Abraham	12542 Brookwood Ct. Davie, FL 33330



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<u>NAME</u>	<u>ADDRESS</u>
REBECCA QUINN	6750 HICKENDS Hwy ^{mt Rest} 29664
Beth Kelly	780 winding River Rd ^{mt Rest} 29664
David D. Doherty	211 Delmar St ^{W. Mountain}
B.G. Citchfield	124 Howard Dr. ^{MT. Rest}
Tib Billingsley	112 N.B. Rd ^{Clayton Ga}
Joseph G. Carter	115 Carder Ridge Rd ^{MT Rest}
Walter E. Smith	445 Lisa Ln. ^{MT. Rest}
Tasha Galloway	840 Whispering Pines ^{MT. Rest}
Randall Lowrey	375 Little
Andrea Collins	
Brandy Touze	PO Box 8432 Seneca SC 29678
Sherry Eller	PO Box 4064 Seneca SC 29679
Jon Parker	204 Wentink Rd ^{Seneca} 29633
Robert G. Phillip	204 Wentink Rd ^{Seneca} 29630
Stanley K. King	121 TYLER CV. ^{WEST UNION SC} 29694
William H. Elliott	161 Bone Camp Rd ^{MT REST} 29666
WILLIAM H. ELLIOTT	200 Volage Creek Rd. ^{MT Rest}
Don Felts	251 ELLIOTT RD ^{MTN Rest}
April Waters	332 Jackson Rd ^{West} ^{Chastota} 29701
Eddie Waters	MT. Rest, SC
	MT. Rest, SC



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<u>NAME</u>	<u>ADDRESS</u>
Jonathan Walker	10940 W. Hartsidge Dr A/Phoebe GA 3002
Mary J Duffell	PO Box 2429 Cashiers, NC 28715
Edith Duffell	" " " 28717
Kevin Burns	4608 Brookwood Trce FL 33629
G. McMillan	33 Popperdy Tr. Greenville NC
Mary Lou Duffell	906 Lincoln, Oxford MS 38655
Jenny Duffell	906 Lincoln Ave, Oxford MS 38655
Paul Duffell	211 St. Andrews Circle Oxford, MS
Karl Barnes	730 W. Rollingwood Rd. Aiken, SC 29801
Cynthia Brown	1467 Estuary Trc Delray Be FL 33472
Jeff Posatsky	3510 57th Av Vero Beach FL 32906
Eric Smith	36970 Sibley Rd New Boston MI 48164
Whitney Paris	36970 Sibley Rd New Boston, MI 48164
Tom Williams	101 Ponsbury Rd. Mt. Pleasant SC.
David Scott	9330 Bluffmill Chase Roswell GA 30076 29464
DAVID BEAM	509 Tall Ship Dr. #310, SALEM SC 29676
Kathy Boydston	509 Tall Ship Dr. #310 Salem, SC
Wes Evgretts	1438 Henry Clay Ave. New Orleans, LA, 70118 29676
Cyndi Paulty	4907 Eider Dr. McKinney, TX 75070
Jeffrey Poulter	4007 Eider Dr McKinney TX 75070
Catherine Kirkpatrick	11709 Delwick Dr. Windermere FL 34786
Ann Curtis	1143 Presene Point Dr. Winter Park, FL
Maurice Cal	1143 Presene Point Dr. Winter Park FL 32789



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<u>NAME</u>	<u>ADDRESS</u>
Chris Rowe	143 Camellia Dr. Valtersboro, SC 29488
William P. Jeter	326 Tuten Rd. Round O SC 29474
Bramblett Braethm	500 Landrum Rd. W. W. Park, SC 29458
Michael Helm	1655 Goodwood Dr Tallahassee 32308 (FLORIDA)
Dominic Deen	134 Sage Meadow Highlands NC 28741
Charlotte Forbes	2316 Sequoia Rd 32211 Jacksonville FL
John C. S.	3694 Blue River Rd. Glenville, N.C. 28736
John S. C.	1431 Biltmore Dr Charlotte NC 28207
FRANK EMMON	4710 Hurdock Road Chy LA NC 28211
Nancy Kennedy	1789 Clark Hills Cr. Chas. SC 29455
Du Walsh	201 Match Point Dr. Chapin SC 29036
Joseph Kennedy	1789 Clark Hills Cr. Chas. SC. 29455
Kristen Dammelt	201 Match Pt Dr. Chapin 29036
Wendy S. Adams	808 Lake Rd Lyden Ky 40742
Richard C. Adams	4460 Parkwood Naples, FL 34112
John S. C.	134 Juniper St Newry CA 94026
Ryan Adams	275 Grace ^{Cove} Highlands N.C. 28741
Barbara Finkler	P.O. Box 2305, Cashiers, NC 28717
Dw Alspaugh	6710 V. Clippinga Cint: OH 45243
John S. C.	3445 Observatory Pl Cincinnati OH 45208
Robert A. Hub	1867 Cole Farm Ln., Loveland, OH 45140
Jim Under	2020 Ninety Six Hwy, Ninety Six, SC 29666
Peppi Blum	" " " " " " " "



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<u>NAME</u>	<u>ADDRESS</u>
Michael Bollen	333 W. Rochester Cashiers
Libby Weatherly	3300 Bankhead Ave Mtay, AL
Jane Shelton	119 Cherokee Views Cashiers
Doreen Ochat	28839 W. Pitner Ave Camp AL
Sam Kerr	60 Big Woods Cashiers
Claude Bullen	Rt. 1. Box 251A Brevard, NC
Bill Johnson	216 Heatm Rd Cashiers
Matthew	136 Wide Road Cashiers, NC
Anna Knight	2431 St Workman Hwy Woodruff, SC
Mike Knight	2431 St Workman Hwy Woodruff, SC
Dr. Benjamin	South Carolina
Kennya Bryant	Charlotte NC
Kenneth Symon	Senators, S.C.
Shawn Cook	Cashiers, NC
Becky Mello	Cashiers, NC
Deborah Kunz	Cashiers, NC
Nancy Luceford	Dallas, Texas
Dean McBrat	La Jolla, Calif
Sheryl Kauth	San Diego, CA.
Melissa Hagen	Yorktown VA



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<u>NAME</u>	<u>ADDRESS</u>
<i>[Signature]</i>	415 Jasper Ln
<i>William Billingsley</i>	583 Norman Billingsley Ln
<i>Ryan Muzitt</i>	415 Jasper Ln
<i>Darren Ince</i>	Chattooga Lake Rd.
<i>John M. Swafford</i>	150 TABATHA LN MTN, REST Se.
<i>James W. Sanders Jr.</i>	150 Bonner Rd Mt Rest S.C. 29664
<i>Patrick McDoygal (boater)</i>	Patrick.McDoygal@gmail.com
<i>Timothy J. Mann</i>	P.O. Box 6 Mt. Rest, SC 29664
<i>Michael Stanil</i>	545 Ebenezer Rd West Union
<i>Fred Pezulla</i>	120 Bonner Rd Mtn. Rest
<i>Lillian O. Pezulla</i>	120 Bonner Rd. Mtn. Rest
<i>Russell Edgins</i>	PO Box 1203 West Union
<i>John & Lisa</i>	1420 Whitman Road, West Union, SC
<i>John W. Adams</i>	P.O. Box 136 MTN REST SC 29664
<i>Ann Adams</i>	PO Box 136 MTN REST 29664
<i>Steve R. Cook</i>	325 Conley rd mt rest 29664
<i>Chris Penn Clark</i>	P.O. Box 135 Mtn Rest S.C.
<i>ISK Baimgarner</i>	751 Highway 107 MT Rest
<i>Krystal Baimgarner</i>	MT. Rest
<i>Stanley Baimgarner</i>	MT. Rest
<i>Anos Baimgarner</i>	MT. Rest



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<u>NAME</u>	<u>ADDRESS</u>
J.A. Wilkins	3130 Kings Dr. Lenoir Co. N.C. 24501
David W. Cooper Jr	9458 Long Creek Hwy, SC
Jared Ketterman	
John Hymrich	104 Graystone Ct. Sumner SC.
Julia Terry Orr	P.O. Box 425 Pendleton SC
Byron	355 Knoll Wood Anderson S.C.
Sharon Cochran	" " "
Beril Smith	229 Selwyn Dr. Anderson, SC
James (Red) Potts	PO Box 280 Highland, N.C.
Kathy Bloodworth	170 Mtn View Mtn Rest
Eland Fackler	PO Box 55 mnt Rest SC
Boyle Morris	224 Morris Rd. Aiken SC
Larry Morris	224 Morris Rd. Aiken S.C.
William Blair	3560 South Deddwood Rd mtn. Rest S.C.
Janice Ne	396 Flat Rock Rd walthalla
Kate Olin	396 Flat Rock Rd walthalla
Stephen Morrison	465 Charlie Cobb Rd Mt Rest SC 29661
M.B. Cochran	050 Pocky GAP FARM RD. MTN POST
Eden Long	437 Trillium Dr. Mtn Rest SC
Suzanne Coffey	280 Chattooga Ridge Rd. Mtn Rest SC
David Egell	551 W. Cove Dr. Mtn. Rest. S.C.



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<u>NAME</u>	<u>ADDRESS</u>
JOHN WELTEX	2211 FRONA PL. EUCLARE WJ 54701
Burke Dial	119 Old Mill Cir Columbia SC 29206
DAVID GRAVES	1911 21 st AVE. SO. NASHVILLE, TN.
MARK Hofmann	3564 Albany Ln. Jacksonville, FL 32217
Susan Hofmann	3564 Albany Jacksonville FL 32217
Robert David Lemley	10 Box 984 Highways NC 28741
Steve Southers	3608 63 rd St W Braden FL 34209
Dave Landis	P.O. Box 984, Highlands, NC 28741
Brad Williams	163 Holly Hills Dr. Athens GA. 30606
Jay L. Ham	638 Chattooga Wood Rd Cashiers 28717
Greg Brown	372 E. Rochester Cashiers 28717
Richard Hendon	281 The Prado, Atlanta, GA 30309
Jeff	16113 Andover Ct, Type, FL 33697
Robert Patrick	11
Suzette Polak	7447 S. Bocage Ct. Baton Rouge, LA
Lj Albit	7447 S. Bocage Cr. Bridgeport, MS 38609
John Graves	372 E. Rochester Dr., Cashiers, NC 28717
Pat Hollings	22923 Tomball Cemetery Rd Tomball TX 77373
Lamar M Brown	405 West Pulaski Dr Hampton, SC 29924
Jennifer Whitener	2010 SE 32 nd St. Ocala, FL 34711
Mary Pope	139 Tazini Kettle Falls Rd. Greenville NC
Roy M. Lanning	404 POMPAUNO ST., EDISTO ISLAND, S.C.
Muhammad Underhill	2190 Forest Dr Cumming, GA 30091



PROTECT THE CHATTOOGA HEADWATERS

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. The boaters already have a near monopoly on 2/3rds of the lower river. Recreational boating and backcountry fishing are incompatible on mountain creeks. The Upper Chattooga should remain wild for fishing, hiking, and other uses on which floating is an intrusion. Opening the upper Chattooga to floating would bring immediate pressure to further develop this wild country into another exclusive franchise for the rafting outfitters. Please keep the headwaters segment of the wild and scenic Chattooga unspoiled.

<u>NAME</u>	<u>ADDRESS</u>
W R Gair III	4 Deskin Hill Green, S.C.
STACY PHILLIPS	106 Tunnel Town NAD SC 29664
Jimmy Howard	151 LARKWOOD RD LIBERTY SC 29657
Ando Brown	136 Independence Way, Easley, SC 29840
Joella Newberry	10 Box 117, Mountain Rest, SC 29664
Ryan Newberry	106 CRAIG PL. MOUNTAIN REST, SC 29664
John A. Wilson	5082 Bethany Ch. Rd. Clinton, SC 2932
Jack Dillingham	162 Norman Billingsley Ln Clayton GA 30525
John Chapman	313 LAKE BECKY Rd, Mt. Rest, SC
Zee Fole	999 Academy Rd Long Creek SC
JACK E. Rholetter	4370 DAMASCUS CH. RD Long Creek, S.C.
Andrew Wilbanks	Long Creek SC.
Allen Webb	Tunnel Town RD
Marshall Brewer	1508 Hatten Ford Rd. Townville SC. 29689
Beverly Beach	150 S Hatten Ford Rd Townville SC 29689
Phillip White	580 Hideaway Point West Union SC 29686
Colby White	" "
Jondra Message	504 Cooke Dr westminster SC 29693
Jonathan Rice	" "
Rosa Dissage	463 whestone rd Mt Rest
Tanya Crisp	4118 Hwy 24 Anderson SC 29626



PROTECT THE CHATTOOGA HEADWATERS

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 backcountry fishing are incompatible on smaller rivers. The Upper Chattooga should remain wild for fishermen, for hiking, and other uses on which floating is an intrusion. Opening the upper Chattooga to floating would bring immediate pressure to further develop this wild country into another exclusive franchise for the highly profitable rafting companies. Keep the headwaters portion of the wild and scenic Chattooga unspoiled.

<u>NAME</u>	<u>ADDRESS</u>
JACK WATSON	421 RICHMOND CRK RD LAKE TOXAWAY
SUSAN SCIULLO	7 HIWASSEE RD LAKE TOXAWAY
Giff Hamph	P.O. Box 505, Glenville 28736
Susany Davis	PO Box 1974 - Cashiers
John Winters	36 ROYCE BARK RD SAPPHIRE
Heather Waus	PO Box 952 Citra FL 32113
Julie Grigos	2640 Raintree Lake Circle, Merritt Island, Fla.
S.H. STORY III	2231 Cumming Rd, Augusta GA 30904
W.H. Fuch	PO Box 1626 Cashiers, NC 28717
Earl R Carter	2215 Bull Pen Rd, Cashiers NC 28717
Kathy Carter	2215 Bull Pen Rd, Cashiers NC 28717
Suzanne Card	PO Box #1311 - Sebring, FL 33871
Allison Padgett	PO Box 1 Cullowhee 28723
Gary Hing	POB 247 Cashiers, N.C.
Cherley Dines Jr.	1231 7 th St - New Orleans
Cherley Dines Jr.	1231 7th Street - NO La
W.D. Duraaway	271 E Lake Decatur, Ga
Doug Sandweh	P.O. Box 591 Highlands, NC 28741-0591
J. Valent	4 Truller Ct Cashiers NC 28717
Keith O. Pope	1686 JIM BERRY RD. FRANKLIN NC.
Glenn Cranston	2503 Whiteade Cove # 28734
by Clecker	184 White End Ln Highlands, NC 28741
Andrews Goldman	330 Oconee Creek Rd, Walhalla, SC 29691



PROTECT THE CHATTOOGA HEADWATERS

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 swimming are incompatible on mountain streams. The Upper Chattooga should remain wild for fishermen, for hiking, and other uses on which floating is an intrusion. Opening the upper Chattooga to floating would bring immediate pressure to further develop this wild country into another exclusive franchise for the highly profitable rafting companies. Keep the headwaters portion of the wild and scenic Chattooga unspoiled.

<u>NAME</u>	<u>ADDRESS</u>
Carol J. Moore	211 Forest Brook Dr. Black Mt, NC
Dilly T. Hughes	1301 waterfront Dr., Mt. Pleasant
Jay HUNTER	1301 WATERFRONT DR. MT. PLEASANT, S.C.
Gobby M O'Neil	211 Forest Brook Dr. Black Mt, NC
Julian Moore	211 Forest Brook Dr. 28711
Stephanie Smith	15 Redwood Rd. Asheville NC 28804
Michelle Thomas	753 Country Club rd. Asheville NC, 28805
Diley HEAVY	47 Evelyn Pl. Asheville NC, 28801
MARVIN THOMAS	253 COUNTRY CLUB RD ASHEVILLE NC 28804
712-4689 Blake Smith	290 White Pine Drive, Asheville, NC 28802
W. J. Gibson	PO. Box 15373 Asheville NC 28813
W. J. Gibson Jr.	928 N Hoods Creek Rd. Asheville NC 28805
Ann Jans	6875 Lisa Ln. Durdwood, GA 30838
Karen M. Koon	177 Jones Cove Rd. Asheville, NC 28800
Regan Fletcher	PO Box 2509, Candler NC 28715
John S. Fletcher	1410 Pisgah Hwy, Candler NC, 28715
Karl Koon	BOX 5377 AVL 28803
McKenna Koon	Box 5377 AVL 28803
FRED NEELY	2083 BOWLER RD., AVL, GA 30318
John Webb	109 Westwood Rd Asheville NC 28804
Scott SISKALY	48 HILLTOP RD ASHEVILLE NC 28803
Phillip Lawrence	502 Prince Georgetown SC
Bob Kelly	PO 2294 Asheville NC



PROTECT THE CHATTOOGA HEADWATERS

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 backcountry fishing are incompatible on smaller rivers. The Upper Chattooga should remain wild for fishermen, for hiking, and other uses on which floating is an intrusion. Opening the upper Chattooga to floating would bring immediate pressure to further develop this wild country into another exclusive franchise for the highly profitable rafting companies. Keep the headwaters portion of the wild and scenic Chattooga unspoiled.

<u>NAME</u>	<u>ADDRESS</u>
Mac Marcott	PO Box 631 Glenville, NC 28736
Cody Harris	1707 Quail Drive, Griffin, GA. 30223
Michael Casey	PO Box 334 Sapphire NC 28774
Bob McAfee	185 WINDRIDGE DR C-VILLE VA 22968
Jeff Small	137 Wade Rd Cashiers NC 28717
John	PO BOX 2943 CASHIERS, NC 28717
Jan Colorado	PO Box 2943 Cashiers NC 28717
Mark Thompson	940 Holloway Rd Malabar FL 32950
Mark Johnson	295 HORSESHOE DRIVE SAPPHIRE NC 28774
Wesley	9919 OAK HAVEN DR SHEPHERD LA 71106
C. Ch	2201 MACONDA Hwy, TX. 77021
John	4254 Whitford Cove Rd 28723
Elaine D. Moss	P.O. Box 810 Cullowhee NC 28717
Paul E. Knauth	3602 Overbrook Houston TX 77027
Robert Kraft	12013 S. 69th Ave Palos Hts. IL 60463
John	1667 W. Little River Dr. Seale, S.C. 29672
John	6225 GUYLE DIRT RD, PANAMA CITY FL 32404
C. Michael Valentini	1487 Langhorne Rd Lynchburg VA 24503
Jack Mincey	P.O. Box 2168 Cullowhee N.C. 28723
W.A. Harvill	238 Hidden Dr. Sapphire, NC 28774
Archie Barnes	" " " " " " " "
Mervin Thomas	253 Country Club Rd. Asheville NC 28804
Phillip Lammonds	502 Prince St. Georgetown SC 29440

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>
Wally Flint	1201 D. Gardner Lane Selmer, TN 38375
Vivian Flint	1201 D. Gardner Ln Selmer, TN 38375
Martha Macmillan	300 Cowee Gap Ln Highlands NC 2874
Chandis Calhoun	P.O. Box 109 - Cashiers, N.C. 28717
Alison Lee	P.O. Box 11; 1411 ZEB AVEY CASHIERS NC 28717
Patricia Hardin	502 V2 Top Road Highlands 28741
Kim O'Connell	112 LUTON RD SPANISH NC 28772
Alie M. Nelson	215 Bowery Rd Highlands NC
DJ Barta	P.O. Box 125 HIGHLANDS, N.C.
Ray McPhail	P.O. Box 1612, Highlands
KNOX MASSEY, JR.	490 SATULAH ROAD, HIGHLANDS
MaryAnn Massey	490 Satulah Road, Highlands, NC
James Hance	433 Ricefield, W. Mt. Pleasant, S.C.
Susan Amick	400 Holt Rd Highlands 28741
Astra Theodorou	2128 Gen. Pershing, New Orleans, LA
Joe Hill	608 Big Bear Fern Rd. 28741
Linda Desbret	PO Box 565485 Anacrest FL
Jenny Austin	POB 1238 Highlands 28741 33256
Debbie Kasner	1485 Twin Lakes Dr. Highlands NC 28741
Diana Miller	9401 River Street Rd. Wad. Ohio
Thomas A Miller	" " " " " " " " " " " "

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<u>NAME</u>	<u>ADDRESS</u>
Maury de Ville	P.O. Box 309 Highlands, NC
William E. David	842 Country Club Dr, Franklin, NC 28734
Reggie L. Smith	94 Cobb Rd. - Highlands
Judson Wallace	94 Cobb Rd - Highlands
Tom H. Blakey	220 Mt. Lebanon, Highlands, N.C.
J. Jay Ioannides	514 Shortoff Rd, Highlands
Patricia T. Boyd	680 Cowee Ridge Rd, Highlands
Elyria Metzger	POB 693 Highlands, NC 28741
Eric Hartman	PO Box 806, Highlands, NC 28741
Ute Tartain	P.O. Box 806 Highlands, NC 28741
James Clark	601 Alston Lane Cornelia, GA 30531
Kynn Wilson	143 Silverado Lane Clayton, GA
Carolyn Clarke	601 Alston Lane, Cornelia, GA 30531
Eric Parker	1735 TIMPSON CREEK RD Clayton 30525
Charles M. Tucker	1935 TIMPSON CREEK RD Clayton 30525
Tricia Siefert	637 Taylor Ridge Rd, Hilliard GA 30537
Bob Kemper	17 CASCADE LN ROBIN GAP GA 30568
Gilman Mannes	391 Sailor Ln, Tiger, GA 30576
Beady A. Mannes	391 Sailor Ln, Tiger, GA 30576
Joyce Handberg	1849 Marumowan Rd, Claytonville 30525
James Scott	1141 Shortoff Rd Highlands, NC 28741

"Friends of the Upper Chattooga"

688 10/20/06

LEAVE THE UPPER CHATTOOGA ALONE!

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<u>NAME</u>	<u>ADDRESS</u>
Jim Stalls	PO Box 160477 Big Sky, MT 59716
Gay Turnley	122 CAROLINE LN CASHIERS NC
Pamela D Turnley	122 Caroline Lane Cashiers NC
PAT Handley	5127 Hwy 107 N Cashiers NC
Dick Funn	451 Lower Mtn Rd Highlands NC
Mary Ward	167 Red Fox Edge Cashiers NC 28747
Robbie Dewey	Box 332 Scaly Mtn, NC 28775
Barbara Smith	Gen. Del. Cashiers, NC
Jane Funsch	PO Box 159 Highlands, N.C. 28749
Chris Pats	P.O. Box 2542
Alisa Rykott	P.O. Box 1303 Highlands, NC 28741
Judy BRASINGTON	P.O. Box 474 Highlands N.C. 28741
Betty K. Brasiter	P.O. Box 474 Highlands N.C. 28741
Idby Kendra	Horse Cove Rd "
Don Jawl	142 Laurel Heights Rd Highlands 28741
BRIAN RENTON	1617 Cherokee Trail FAYETTEVILLE NC 28704
Dennis M. Renta	PO Box 397, Glenville, NC 28731
Deborah Lassiter	1485 Twinlakes Dr. Highlands, NC 28741



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State of South Carolina

Office of the Governor

MARK SANFORD
GOVERNOR

POST OFFICE BOX 12267
COLUMBIA 29211

August 6, 2007

Jerome Thomas
Forest Supervisor
Francis Marion and Sumter National Forest
4931 Broad River Road
Columbia, SC 29212

Cc: Senator James DeMint,
Energy and Natural Resources Committee

The issue elaborated on below came up during one of my office hour visits, and I would appreciate your consideration and help on it as the Chattooga River is an important resource for the State of South Carolina. It provides recreational opportunities including whitewater boating, the state's best trout fishing, hunting and backpacking. Nature viewers can experience the backcountry solitude while Day hikers, campers and picnickers can select from a variety experiences currently available along the Chattooga Wild and Scenic River and the Ellicott Rock Wilderness Area.

The Sumter National Forest has provided exemplary stewardship by insuring the Chattooga provides a complete range of recreational experiences for South Carolinians. We support your efforts to continue a policy that supplies diversity and balances the state's overall recreational needs.

We understand that the current Forest Service policy is being challenged by the private boating interests, and that the USFS is reviewing its successful thirty year policy of zoning the river for different user groups. We ask the USFS to please

Rec'd FS 8-7-07

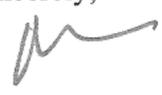
consider the following South Carolina concerns regarding allowing boating in the upper Chattooga.

- Opening the upper Chattooga River, which is currently managed for trout fishing and is considered the premier trout fishery in South Carolina, to private boaters will likely displace some South Carolina fisherman, and deter out of state fishermen from visiting. The options for displaced resident anglers will be smaller, less desirable streams in South Carolina, or streams in neighboring states which will require expensive non-resident licenses. Non-resident anglers will take their fishing and dollars to neighboring states.
- The projected growth in all activities on the South Carolina side of the river corridor over the next thirty years requires careful study to insure the Chattooga remains a viable recreational resource for current users and future generations.
- Private property interests of the Whiteside Cove Association members that live in South Carolina are threatened by potential boater trespass.
- The safety of search-and-rescue personnel and associated costs for the surrounding counties will be a concern because of the remoteness and ruggedness of the upper Chattooga.
- The desires of all user groups, especially those not represented by any organization, need to be given equal consideration.
- Any changes in current policy need to ensure that the largest designated wilderness in South Carolina retains its primitive character.

We appreciate your efforts in managing many of South Carolina's most valuable natural resources. We realize the importance of reviewing management policy for such a diverse array of interests. We hope future policy continues to provide something for everyone and that opportunities along the entire Wild and Scenic corridor are reviewed in totality for the benefit of South Carolina's residents and visitors.

Thank you for your time and consideration. Please let our office know if South Carolina can help with any additional reports on SC recreational demographics we may have already collected including DNR angling surveys.

Sincerely,



Mark Sanford

MITCHELL & COMPANY
CERTIFIED PUBLIC ACCOUNTANTS

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D <



Member
American Institute of Certified Public Accountants
Florida Institute of Certified Public Accountants

JOSEPH D. MITCHELL, CPA
C. GUY FARMER, CPA

TELEPHONE 850/386-2522
FAX 850/386-8955

The Honorable Elizabeth Dole
555 Dirksen Senate Office Building
Washington, D.C. 20510

September 7, 2007

Re: Boating Regulations on the Chattooga River in Georgia

Dear Honorable Elizabeth Dole,

49 <

I am a property owner in the Cashier area of North Carolina and I'm writing to inform you of my support of maintaining the waterways of the Scenic Chattooga River in their present condition, **and not opening them to further traffic**. I am asking you on behalf of The U.S. forest service to join me in the effort to preserve a part of our waterways and wildlife in the North Georgia area. Please send a letter of concern to our U.S. Forest Service stating that you agree with the preservation of this area for the following reasons:

- The Forest Service ban should stay in effect to truly maintain the wild nature and clean waters of the Upper Chattooga.
- A well-funded lobby group should not be able to dictate the use of a precious natural resource.

131 <

Boaters already cover 36 miles of the Chattooga River, a mere 21 is still accessible just not in use for boating.

99 <

We want to protect Slide Rock and let it remain a family-friendly swimming hole and The Iron Bridge a remote picnic area for both safety and environmental reasons.

Please join me in the effort to protect our natural environment and the way of life we so love in these mountains. A deadline of September 13, 2007 is set by the U.S. Forest Service to receive comment on the issue.

The Honorable Elizabeth Dole
Page 2
September 7, 2007

I thank you for your time to preserving the Chatooga River and keeping our waterways fresh, clean and reproductive.

The address to send your letters of concern is listed below:

Forest Supervisor's Office
Francis Marion and Sumter National Forests
4931 Broad River Road
Columbia, SC 29212-6090
webmaster@fs.fed.us

Sincerely,

Guy Farmer

GF:hf
Enclosure

cc: Forest Supervisor's Office
Francis Marion and Sumter National Forests

691

The Honorable Richard Burr
Page 2
September 7, 2007

I thank you for your time to preserving the Chatooga River and keeping our waterways fresh, clean and reproductive.

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4931 Broad River Road
Columbia, SC 29212-6090
webmaster@fs.fed.us

Sincerely,

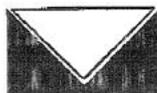
Guy Farmer

GF:hf
Enclosure

cc: Forest Supervisor's Office
Francis Marion and Sumter National Forests

692

MITCHELL & COMPANY
CERTIFIED PUBLIC ACCOUNTANTS



Member
American Institute of Certified Public Accountants
Florida Institute of Certified Public Accountants

JOSEPH D. MITCHELL, CPA
C. GUY FARMER, CPA

TELEPHONE 850/386-2522
FAX 850/386-6955

Duplicate

The Honorable Heath Shuler
412 House Office Building
Washington, D.C. 20510

September 7, 2007

Re: Boating Regulations on the Chattooga River in Georgia

Dear Honorable Heath Shuler,

I am a property owner in the Cashier area of North Carolina and I'm writing to inform you of my support of maintaining the waterways of the Scenic Chattooga River in their present condition, **and not opening them to further traffic**. I am asking you on behalf of The U.S. forest service to join me in the effort to preserve a part of our waterways and wildlife in the North Georgia area. Please send a letter of concern to our U.S. Forest Service stating that you agree with the preservation of this area for the following reasons:

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The Honorable Heath Shuler
Page 2
September 7, 2007

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webmaster@fs.fed.us

Sincerely,

Guy Farmer

GF:hf
Enclosure

cc: Forest Supervisor's Office
Francis Marion and Sumter National Forests

693

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CERTIFIED PUBLIC ACCOUNTANTS



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American Institute of Certified Public Accountants
Florida Institute of Certified Public Accountants

JOSEPH D. MITCHELL, CPA
C. GUY FARMER, CPA

TELEPHONE 850/386-2522
FAX 850/386-6955

Dr. Jerome Thomas
Attention: John Cleeves
4391 Broad River Rd.
Washington, D.C. 20510

Duplicate

September 7, 2007

Re: Boating Regulations on the Chattooga River in Georgia

Dear Dr. Jerome Thomas,

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Dr. Jerome Thomas
Page 2
September 7, 2007

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Forest Supervisor's Office
Francis Marion and Sumter National Forests
4931 Broad River Road
Columbia, SC 29212-6090
webmaster@fs.fed.us

Sincerely,

Guy Farmer

GF:hf
Enclosure

cc: Forest Supervisor's Office
Francis Marion and Sumter National Forests

Donald W. Eng
124 Fifeshire Drive
Columbia, SC 29212-1906
September 5, 2007

Both
Cys to
PERGH
694
DC

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

Subject: Public Input-Chattooga River Management above Highway 28.

Dear John,

49 <
115 <
96 <
116 <

I have talked to you and written to you, Supervisor Thomas, Gloria Manning, and Chief Abigail Kimbell before about the above stated subject. I am opposed to any boating above Highway 28. The Forest Service should recognize that the upper portion of the Chattooga River and Ellicott Rock Wilderness Area is the only large river primitive area in the Southeast USA. This area provides solitude experience for hikers, nature enthusiasts, bird watchers, and fisherpersons who enjoy the true scenic beauty, wildflowers and wildlife available. Boating will alter this environment significantly. Maybe slowly at first, but eventually it could be like the lower Chattooga. Boating events along with spectators will definitely alter the fragile environment along the riverbanks and just as important, have negative impacts on other users. In the past, the Forest Service has not been able to fully control boating below Highway 28 according to the Management Plan nor control unlawful boaters above Highway 28. It is time for the FS to stand tall and wear a white hat in protecting this unique area.

Specific Comments on preliminary alternatives:

2
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116 <
4
17 <
18 <
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1. Maintain existing management. It has worked satisfactorily for over 30 years. With adequate maintenance of trails and campsites along with increase law enforcement would maintain both the biological and social values of this area. Support.
2. This alternative could actually improve the area if boating is not permitted. But I am doubtful if the FS will or can afford the additional administration.
3. Response, same as number 1 and 2. Support
4. Unworkable. There will be conflicts between users with social values loss to groups and individuals who want a primitive area to enjoy. Voluntary registration has not worked successfully in National Parks and Wilderness Areas. FS will lose control of use on the upper Chattooga. Oppose.
5. Unworkable. Reasons the same as number 4. Oppose.
6. The impact on the biological resources and social values will be significant to everyone except boaters and boating industry. Currently they govern the use of the lower Chattooga Wild and Scenic River Area below Highway 28 that has many challenging rapids.

My general statement before specific comments apply to all preliminary alternatives.

I wish the Forest Service success in providing the needed protection of the Upper Portion of the Chattooga River.

Sincerely,

Donald W. Eng
Retired Forest Supervisor, Francis Marion and Sumter National Forests.

HX

Cc: Jerome Thomas, Gloria Manning, Chief Abigail Kimbrell

Rec'd PS
9-7-07
1

Donald W. Eng
124 Fifeshire Drive
Columbia, SC 29212-1906
September 5, 2007

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

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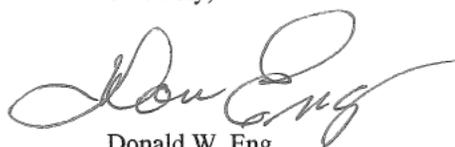
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- 6. The impact on the biological resources and social values will be significant to everyone except boaters and boating industry. Currently they govern the use of the lower Chattooga Wild and Scenic River Area below Highway 28 that has many challenging rapids.

My general statement before specific comments apply to all preliminary alternatives.

I wish the Forest Service success in providing the needed protection of the Upper Portion of the Chattooga River.

Sincerely,



Donald W. Eng
Retired Forest Supervisor, Francis Marion and Sumter National Forests.

Cc: Jerome Thomas, Gloria Manning, Chief Abigail Kimbrell



GEORGIA WILDLIFE FEDERATION

AFFILIATED WITH THE NATIONAL WILDLIFE FEDERATION

11600 Hazelbrand Road
Covington, Georgia 30014

695
(770) 787-7887
FAX (770) 787-9229
E-mail: gwf@gwf.org

July 10, 2007

Supervisor Jerome Thomas
Sumter National Forest
USDA Forest Service
Attn: John Cleaves
4391 Broad River Road
Columbia, S.C. 29212-3530

These comments are being submitted by the Georgia Wildlife Federation (GWF). GWF represents more than 50,000 members throughout Georgia who encourage the intelligent management and wise use of water, forest and plant life, and its dependent wildlife. We appreciate the time and effort that the U.S. Forest Service has put into the Upper Chattooga River Visitor Capacity Analysis Implementation Plan and appreciate this opportunity to comment on the report.

22 < Our two major concerns are the indirect effects of recreation on wildlife in an area that has had limited human intrusion for the past thirty years and the negative effect on
112 < fishing in this wild area. Boating through the Upper Chattooga will allow easy access through the heart of the Chattooga headwater areas which are otherwise often inaccessible and sometimes extremely inaccessible. Studies have shown that there are certain species, such as the black bear, that require large core areas of wild land with minimal human impacts and disturbance in order to thrive, especially for denning and reproduction. Given the rapid increase of development on private lands in the Southeast, public lands – national forests, parks and other preserves are critical for providing the kind of backcountry where remote wild conditions provide the high-quality habitat free from human interference needed by these species. The Chattooga River corridor is important as a central, core component of the larger wild landscape that includes the Ellicott Rock Wilderness and the Rock Gorge Roadless Area.

22 < Some studies point out that the indirect effects of recreation on wildlife populations are likely to be substantial, but there is little documentation of these impacts. The literature on wildlife/recreation effects constantly points out the need for more research in the area. Because of the difficulty in designing studies with adequate controls that yield conclusive results there is not enough information to justify allowing a sudden increase in human activity in the area.

The Chattooga flows through the heart of one of the largest blocks of forest interior habitats remaining on the Blue Ridge Escarpment. The Ellicott Rock Wilderness and the Rock Gorge Roadless area together comprise a wilderness reserve core of more than 15,000 acres, strategically as a reserve anchor within the larger wildlands habitat block

Dedicated to the Conservation of our Natural Resources



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on the Escarpment. The Southern Blue Ridge Escarpment is home to more than 300 rare species and natural communities including a viable black bear population. The analysis of the area should recognize that the wild conditions that have developed in the Chattooga headwaters are a direct result of the first zoning measures that prohibit boat traffic in the area. Any increase in human traffic on the upper Chattooga River, largely isolated for the past thirty years, would clearly represent a fundamental change in the character of the area and thus must be subject of a full, comprehensive environmental impact analysis.

132 < The upper portion of the Chattooga River has cold water that is conducive to trout survival and natural regeneration. Anglers are aware that roadless areas generally provide the least degraded streams where trout and other desirable fish species dependent on clean water and stable stream flows can thrive. Isolated areas, such as the Upper Chattooga, reduce the vulnerability of fish to excessive harassment and harvest. There are no roads paralleling the river as is the case on most rivers of its size. The Upper Chattooga is the premier place in Georgia where an angler can enjoy a truly wild experience free from the intrusion of boats. This was the intent of the Forest Service in the early 1970's when they made the decision to separate the boaters from the anglers. Opening the river above the Highway 28 Bridge to boating will change all this. Anglers will no longer experience the solitude that brings them to the area. Boaters are also likely to spook the trout and reduce the chance for fishing success.

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22 < The upper Chattooga watershed is a unique biological and cultural resource that is likely to suffer significant degradation from the human impacts associated with boating. The Forest Service should maintain the current Forest Plan management direction of the Upper Chattooga for all existing recreational uses. No action should be taken unless studies are conducted to determine what the effects of a substantial increase of human intrusion on wildlife will be including a full, comprehensive environmental impact analysis.

49 <

Sincerely,



Jerry L. McCollum
President and CEO
Georgia Wildlife Federation

Friends of the Upper Chattooga
2368 Pinnacle Drive
Clayton, Georgia 30525

Handwritten notes: "John + Jill", "to John -> 2) JC", "696", "DC", and a checkmark.

July 28, 2007

✓ Jerome Thomas, Supervisor
USDA Forest Service, Sumter National Forest
- Attn: John Cleaves
4391 Broad River Road
Columbia, South Carolina 29212-3530

RE: Upper Chattooga River Visitor Capacity Analysis Scoping Notice

Dear Supervisor Thomas,

Friends of the Upper Chattooga individually and collectively urge the USDA Forest Service to give particular attention to the list of factors below as your team develops the upcoming scoping notice and alternatives for management of the North Fork of the Chattooga River and all its tributaries. These factors are all based on common sense, existing Forest Service studies and rules and/or federal law.

All suggest strongly that the Forest Service must, as a priority over all else, protect the outstandingly remarkable values and wild, natural resource that make the Ellicott Rock Wilderness and the Wild and Scenic Chattooga the very special places that they are today and should be for future generations.

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The list:

- 25 • **Preserving wilderness resources.** "Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness." Forest Service Manual 2320.6
- 27 • **Wilderness values must dominate.** "Where there are alternatives among management decisions, wilderness values shall dominate over all other considerations." Forest Service Manual 2320.3
- 27 • **Primary emphasis.** ".... primary emphasis shall be given to protecting its aesthetic, scenic, historic, archaeological, and scientific features." Wild and Scenic River Act, Section 10(a)
- 151 • **Primitive experience over recreation demand.** Future public demand in the Chattooga corridor could reach saturation and cause degradation of the experience, according to the 1971 study of Wild and Scenic Chattooga area. The report recommends resource development should be guided by preserving the primitive experience as a priority over demand.
- **Wild river segments.** The wild segments of the Chattooga River are the most primitive and remote, and whose management "is focused on protecting the outstandingly remarkable values of the river and preserving the natural environment

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and natural processes from human influences." Land and Resource Management Plan for the Chattahoochee-Oconee National Forests, page 3-26.

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• **Little or no human intervention.** As for the portion of the river that transects the Ellicott Rock Wilderness, note that Forest Service management emphasis "is to allow ecological and biological processes to progress naturally with little to no human influence or intervention, except the minimum impacts made by those who seek the wilderness as a special place that offers opportunities to experience solitude." Land and Resource Management Plan for Sumter National Forest, page 3-1.

64

• **Large Woody Debris.** It is Forest Service management policy to recruit accumulation of Large Woody Debris to the creeks and rivers that it manages, with the desired condition being approximately 200 pieces of such debris per stream mile, according to the Sumter's management plan (page 3-41,) and the June, 2007, integrated analysis of Capacity and Conflict on the Upper Chattooga River (page 56.) By contrast, both the integrated report and experience on the ground after Hurricane Opal suggest that boaters without permission routinely cut and remove such debris with chainsaws.

152, 120, 62

• **Unrestricted boating would overwhelm the resource.** The Integrated Report (Whitaker, 2007,) notes boating could occur on the North Fork as low as the 1.8-foot level. The gauge was recorded as being over 1.8 feet for 79 percent of the time during the period 2003-2005 (or 862 days.) For 386 consecutive days (from 9/7/2004 until 9/28/2005,) there were only four days with levels under 1.8.

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• **Boating displaces other river visitors.** Boating on the lower 36 miles of the Chattooga, which provides for unlimited private boating and regulated commercial boating, has clearly displaced other visitors wishing to avoid user conflicts and/or interference while seeking solitude and quietness. (See pages 15 and 69 of the Integrated Report.)

I

• **The public overwhelmingly supports zoning of the North Fork.** The Sumter National Forest has received 423 personal comments in connection with the ongoing analysis - 60 percent of which were not in favor of unrestricted boating on the Upper Chattooga. In the case of the Forest Service public hearing held in Walhalla, S.C., on July 10, 35 of the 56 speakers (almost two-thirds) came out against unrestricted boating.

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• **Common sense should prevail.** Zoning of conflicting activities is good stewardship, not discrimination. Stewardship encompasses far more than picking up litter. It includes the protection of the aesthetic values of natural resources such as remoteness and wildness, the proper regard for the rights of others to solitude, and the responsibility of preserving these values intact for future generations.

152, 115

• **If permitted and established, boating will, most likely and predictably, overwhelm the Upper Chattooga just as it has the lower river as evidenced above.** Whitewater boating, or "creeking," is an extreme challenge sport rapidly growing in popularity (see page 22 of the Whitaker report.) If boating is permitted and established on the Upper Chattooga, degradation of both environmental resource and social conditions will inevitably occur, and it will be virtually impossible for the Forest Service to ever reverse course and revert to current management.

I

• **Direct, indirect and cumulative effects.** Forest Service procedures, (from the Forest Service Manual, 2320.3,) require the agency to "gather necessary information and

carry out research programs in a manner that is compatible with the preservation of the wilderness environment.” This requirement leads to multiple questions. Among them: Has the Forest Service gauged the direct, indirect and cumulative effects of boating on riverbanks, flora and fauna of the Upper Chattooga? Have the negative impacts been studied. Have new biological surveys been accomplished?

Please let us know if there are any questions. We look forward to seeing the scoping notice, and ask that you note Friends of the Upper Chattooga have picked up several new signatories – testament to the widespread interest in this issue.

Sincerely,

Michael Smith

Michael “Squeak” Smith
Southeast Region Vice-President and Member of the Board of Trustees,
Trout Unlimited

By JG, with express permission JG 7/28/07

Butch Clay

Butch Clay
Mountain Rest, S.C.

By JG, with express permission JG 7/28/07

Joseph Gatins

Joseph Gatins
Co-District Leader
Georgia ForestWatch

Doug Adams

Doug Adams,
Newsletter Editor, Rabun Chapter, Trout Unlimited

By JG, with express permission JG 7/28/07

Charlie Breithaupt

Charlie Breithaupt,
Chairman, Georgia Council of Trout Unlimited

By JG, with express permission JG 7/28/07

Tom McInnis

Tom McInnis,
Chairman, South Carolina Council of Trout Unlimited
By JG, with express permission JG 7/28/07

Art Shick

Art Shick,
South Carolina Trout Unlimited & NLC Representative
By JG, with express permission JG, 7/28/07

Buzz Williams

Buzz Williams,
Executive Director, Chattooga Conservancy
By JG, with express permission JG, 7/28/07

David Bates

David Bates,
Executive Director, Jackson-Macon Conservation Alliance
By JG, with express permission JG 7/28/07

Wyatt Stevens & Mike Bamford

Wyatt Stevens and Mike Bamford
for the Whiteside Cove Association
By JG, with express permission 7/28/07 JG

George Nickas

George Nickas
Wilderness Watch
By JG, with express permission JG 7/28/07

Brent Martin

Brent Martin
The Wilderness Society
By JG, with express permission JG 7/28/07

John Benbow

John Benbow,
President, North Carolina Wildlife Federation
By JG, with express permission JG 7/28/07

Jerry McCollum

Jerry McCollum
Georgia Wildlife Federation
By JG, with express permission JG 7/28/07

#

697
DC

August 17, 2007

Bill and Kathy Brock
PO Box 125
Seneca, SC 29678

Att: Michael Crane
District Ranger USFS
Andrew Pickens Ranger District
Walhalla, SC, 29671

Dear Michael Crane,

We are writing to express our views concerning the use of the Chattooga River above Hwy 28 in Oconee County, South Carolina. Boaters-kayaks, rafters, etc would like access to this upper portion of the river. So far, only fishermen can use it.

49

We would like to keep its use the way it is currently being used – for fishing and nature. This portion on the river is the only area not disturbed. Please leave it as it is.

Sincerely,

Bill & Kathy Brock

Bill and Kathy Brock

_____	ORA	_____
_____	FMO	_____
_____	Rvr/Mtd	_____
_____	Rec Tech	_____
_____	Eq Op	_____
_____	Rec/Fire	_____
_____	Temps	_____
_____	File	_____
_____	LEO	_____

AUG 20 2007

Ranger	<u>Wrd</u>	ORA	_____
SSS	_____	FMO	_____
Res Asst	_____	Rvr/Mtd	_____
TMA	_____	Rec Tech	_____
Forester	_____	Eq Op	_____
Trainee	_____	Rec/Fire	_____
Bio	_____	Temps	_____
Bio Tech	_____	File	_____
LEO	_____		<u>70 50</u>

Friends of the Upper Chattooga
2368 Pinnacle Drive
Clayton, Georgia 30525

August 22, 2007

Jerome Thomas, Supervisor ✓
USDA Forest Service, Sumter National Forest
Attn: John Cleeves
4391 Broad River Road
Columbia, South Carolina 29212-3530

RE: Upper Chattooga River Visitor Capacity Analysis Scoping Notice

Dear Supervisor Thomas,

Friends of the Upper Chattooga individually and collectively and the individual signatories below file this letter as an initial response to the USDA Forest Service's request for comment on the Upper Chattooga River Visitor Capacity Analysis scoping notice of August 14, 2007.

As you know, the planners for the Sumter National Forest have informed us that none of the letters, comments and other statements filed with your office to date on this topic will count toward the ongoing analysis under the National Environmental Policy Act unless formally refiled.

Accordingly, kindly review the letters, studies and comments listed below, copies of all of which are already in the possession of your office. We shall in due course also seek to provide e-mail copies of this material, to help facilitate review by your office. This compendium includes a large variety of significant issues that must be evaluated and analyzed by the Forest Service as it conducts a thorough Environmental Assessment and "effects analysis" of this issue.

We look forward to reviewing your development of these critical issues as the agency gets deeper into the NEPA process.

Feel free to call if there are questions.
Sincerely,

Michael "Squeak" Smith

Michael "Squeak" Smith
Southeast Region Vice-President and Member of the Board of Trustees,
Trout Unlimited
By JG, with express permission JG 8/22/07

698

DC

13 signatures
49

upli wlk

Rec'd FD 8-27-07

Butch Clay

Butch Clay

Mountain Rest, S.C.

By JG, with express permission JG 8/22/07

Joseph H. Gatins

Joseph Gatins

Co-District Leader

Georgia Forest Watch

Doug Adams

Doug Adams,

Newsletter Editor, Rabun Chapter, Trout Unlimited

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Art Shick,

South Carolina Trout Unlimited & NLC Representative

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 President, North Carolina Wildlife Federation
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Jerry McCollum

Jerry McCollum
 Georgia Wildlife Federation
 By JG, with express permission JG 8/22/07

Attachment:

**Letters, studies, comments previously filed
 with Sumter National Forest by members
 of Friends of the Upper Chattooga, and
 resubmitted for NEPA analysis and review, August 22, 2007**

- August 22, 2007. Mike Bamford. *“Concerns Regarding the Direction of the Chattooga Analysis.”*
- July 28, 2007, Friends of the Upper Chattooga letter to Supervisor Thomas. List of important factors necessary for proper scoping.
- July 12, 2007. Whiteside Cove Association (Mike Bamford) letter to John Cleeves. Comments on study submitted to Forest Service, *“Capacity and Conflict on the Upper Chattooga River.”*
- July 10, 2007. Doug Adams. Verbal comments submitted to the public hearing.
- July 10, 2007. Doug Adams. Written comments submitted to the public hearing.
- July 10, 2007. South Carolina TU (Tom McInnis) letter to John Cleeves at public hearing. Importance of headwaters and preservation of wilderness character.
- July 10, 2007. Georgia ForestWatch letter (Joseph Gatins) to Supervisor Thomas at public hearing. List of significant issues.
- July 10, 2007. Edwin Dale letter to Supervisor Thomas at public hearing. Raises questions regarding process.
- June 29, 2007, Friends of the Upper Chattooga letter to Supervisor Thomas. List of biophysical and social issues requiring review prior to management action.
- June 26, 2007. Doug Adams e-mail to Supervisor Thomas. List of items for consideration prior to Standard Workshop of July 14.
- June 25, 2007. Doug Adams e-mail to Tony White and John Cleeves. Comments on the Upper Chattooga “decision environment.”
- June 24, 2007. Doug Adams e-mail to Tony White and John Cleeves. Comments regarding “Integrated Report” reference to angler’s diary.
- June 22, 2007. Doug Adams e-mail to Tony White and John Cleeves. Comments on aquatic habitat indicators for management standards.
- June 19, 2007. Friends of the Upper Chattooga letter to Supervisor Thomas. Butch Clay white paper re: the Upper Chattooga “decision environment.”
- May 30, 2007. Friends of the Upper Chattooga to Supervisor Thomas. Mike Bamford white paper, *“Managing for the View of the Wild and Scenic Chattooga.”*
- May 3, 2007. ENSR Corporation letter (Kenneth Wagner, Ph.D.) to John Cleeves. Comments on Chattooga studies.
- May 3, 2007. Mike Bamford paper filed with Forest Service, *“Concern regarding the Chattooga River Expert Panel Field Assessment.”*
- May 3, 2007. Friends of the Upper Chattooga letter (McKenna Long & Alridge) to Supervisor Thomas. Voice concern key recommendations not being followed, including review of historic impacts of boating on lower Chattooga.
- May 1, 2007. Friends of the Upper Chattooga report on Upper Chattooga scenery impacts, *“Beauty is in the Eye of the Beholder.”*
- April 30, 2007. Friends of the Upper Chattooga letter to Supervisor Thomas, regarding tributaries and large woody debris.
- April 20, 2007. Friends of the Upper Chattooga letter to Supervisor Thomas. Forwarding copy of Doug Adams “Point and Counterpoint” assembled April 17, 2007.
- March 12, 2007. Georgia ForestWatch letter to US Fish and Wildlife Service and copy to USDA Forest Service. Need to review incident of eastern Cougar in Upper Chattooga corridor.

- December 15, 2006. Whiteside Cove Association report. “*Chattooga Swimming in North Carolina.*”
- November 30, 2006. Whiteside Cove Association report. “*Relaxation or Creek Boating – Not Both.*”
- November 9, 2006. Whiteside Cove Association report. “*Access Limitations through Road Closures.*”
- October 24, 2006. Friends of the Upper Chattooga letter to Supervisor Thomas. NEPA concerns with study plans.
- October 20, 2006. Whiteside Cove Association to John Cleeves. Concerns re: Implementation plan.
- October, 2006. James T. Costa letter to Supervisor Thomas. Degradation likely if Upper Chattooga opened to boating.
- October 6, 2006. Senior U.S. District Judge William C. O’Kelley order dismissing American Whitewater suit seeking unlimited boating on Upper Chattooga, filed in U.S. District Court, Gainesville, Georgia.
- August, 2006. Friends of the Upper Chattooga letter to Supervisor Thomas. Additional matters re: visitor capacity analysis.
- July 20, 2006. Friends of the Upper Chattooga to Supervisor Thomas. Concerns re: boater trials.
- July 5, 2006. Friends of the Upper Chattooga amicus brief filed with U.S. District Court, Gainesville, Georgia, in re: American Whitewater v. Dale Bosworth, including affidavits from Max Gates and Jim Barrett.
- May 10, 2006. Friends of the Upper Chattooga to Chief Dale Bosworth. Re: American Whitewater’s threat to litigate issue.
- April 28, 2006. Affidavit of Jim Barrett.
- April 27, 2006. Friends of the Upper Chattooga letter to John Cleeves. Incompatibility of creeking with solitude.
- April 11, 2006. Friends of the Upper Chattooga letter to Supervisors Atkinson, Hilliard and Thomas. Urging study of lower Chattooga to properly understand Upper Chattooga.
- April 10, 2006. Affidavit of Max Gates.
- January 10, 2006. Whiteside Cove Association statement, re: Creek boating.
- December 27, 2005. Whiteside Cove Association letter to John Cleeves. Concerns regarding physical carrying capacity of roads, parking lots and trails.
- November 17, 2005. Georgia ForestWatch letter to John Cleeves. Concerns re: study.
- April 18, 1988. Boating on Yellowstone’s Rivers – An Analysis and Assessment, prepared by U.S. Department of the Interior.

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