September 13, 2007

VIA ELECTRONIC AND FIRST CLASS MAIL

Mr. John Cleeves
4931 Broad River Road
Columbia, SC 29212-3530

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

Re: August 24, 2007 "NEPA Scoping Package"
File Code 1920-2
Upper Chattooga River Management

Dear Mr. Cleeves:

On August 14, 2007, the United States Forest Service ("USFS") published a scoping letter containing a package of proposed management alternatives ("USFS Alternatives") relating to the Chattooga Wild and Scenic River above Highway 28 ("Headwaters"). American Whitewater's comments to the USFS Alternatives and scoping letter are enclosed herewith.

Thank you for considering these comments.

Sincerely,

Kevin Colburn
National Stewardship Director
American Whitewater
1035 Van Buren St.
Missoula, MT 59802
406-543-1802
Kevin@amwhitewater.org

cc: Mark Singleton, AW
Don Kinser, AW
Charlene Coleman, AW
Brian Jacobson, AW
Nathan Galbreath, Patton Boggs
Chuck Myers, USFS

442076

COMMENTS OF AMERICAN WHITEWATER
TO
UPPER CHATTOOGA NEPA SCOPING PACKAGE,
AND PROPOSAL OF REVISED MANAGEMENT ALTERNATIVES

Prepared by:

Kevin Colburn
American Whitewater
National Stewardship Director
1035 Van Buren St.
Missoula, MT 59802
406-543-1802
Kevin@amwhitewater.org

September 13, 2007

TABLE OF CONTENTS

I. Brief Background 1

A. Pre-Administrative Appeal 1

B. Administrative Appeal 2

C. Post-Administrative Appeal 2

D. USFS Alternatives 4

II. Critique of Proposed USFS Alternatives 4

A. Problems Associated with all USFS Alternatives 4

1. All alternatives must protect and enhance whitewater boating 4
2. Alternatives should recognize high use frontcountry areas and low use backcountry areas as different 5
3. Alternatives must include a range of use limits for all users 8
4. Alternatives must be based on a capacity for all users and/or individual uses 8
5. Alternatives must include indirect limits prior to direct limits 8
6. Alternatives, to the extent they address angling, must address stocking 8
7. Alternatives should consider impacts of management decisions on recreationists, equally with impacts those recreationists may have on one another 9

B. Problems Associated with Specific USFS Alternatives 9

1. Deficiencies in USFS Alternative #1 (No-action alternative) 9
2. Deficiencies in USFS Alternative #2 12
3. Deficiencies in USFS Alternative #3 14
4. Deficiencies in USFS Alternative #4 17
5. Deficiencies in USFS Alternative #5 20
6. Deficiencies in USFS Alternative #6 23

C. Deficiencies in the Scoping Document Generally 25

III. American Whitewater's Proposal 26

A. American Whitewater's Proposed Alternatives Related to Recreational Use 27

1. Nationally Consistent River Management Alternative #1 (**high encounter standard**) 27
2. Nationally Consistent River Management Alternative #2 (**moderate encounter standard**) 28
3. Nationally Consistent River Management Alternative #3 (**low encounter standard**) 30

B. Basis for USFS Inclusion of American Whitewater's Proposed Alternatives: 31

IV. Other Important Management Issues and Proposed Alternatives 32

A. Fish Stocking: 32

B. User Created Trails: 32

C. In-stream Wood Management: 32
D. Parking 33
E. Private Land Corridor 33
V. Conclusions 34

Exhibits

Exhibit 1: Special Boating Permit System Available If Capacity Ever Exceeded

Exhibit 2: Additional Resources to Consider in Formulation of Final USFS Proposed Alternatives

Exhibit 3: Managing Wood in Rivers, a synopsis of a talk given in May, 2007 at the River Management Society Interagency Conference.

I. Brief Background

A. Pre-Administrative Appeal

Critical to formulation and evaluation of these alternatives is the fact that the portion of the Chattooga River north of Highway 28 (the "Headwaters") is part of the federally protected Wild and Scenic River System. The Headwaters was protected in 1974 expressly because it provides unique and outstandingly remarkable opportunities for whitewater recreation. In fact, the Congressional Wild and Scenic River study even found that the best way to see and experience the Headwaters is "from a boat," and labeled Grimshawes Bridge as "the beginning of rafting water." *See figure 1.*

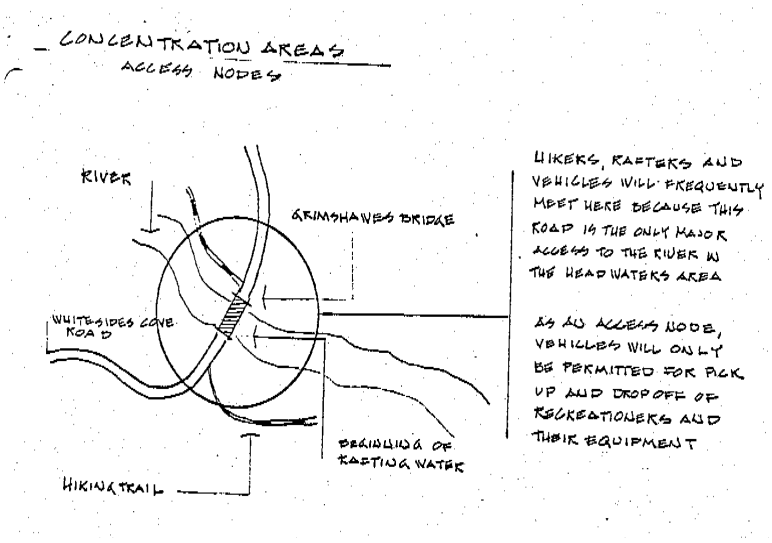


Figure 1 – USFS WSR Report: Grimshawes Bridge, "Beginning of Rafting Water"

Because whitewater boating was among the "Outstandingly Remarkable Values" that caused the Headwaters to be included in the Wild and Scenic Rivers System, federal law requires this administrative agency to "protect and enhance" hand-powered floating on the Headwaters.

Nevertheless, in 1976 and 1985 the United States Forest Service ("USFS") inexplicably banned all whitewater boating on the Chattooga Headwaters.[1] Before the USFS banned paddling on the Headwaters in 1976, hand-powered floating had occurred without limitation on the Chattooga Wild and Scenic River for more than 200 years. The reason for the 1976 and 1985 bans remains a mystery. The USFS itself recently attempted to uncover the basis for the 1976 and 1985 bans. However that attempt was unsuccessful because the historical records "failed to provide data or analysis."[2]

On January 30, 2004, Bob Jacobs, in his capacity as Regional Forester for the USFS's Region Eight (Southern Region), published a *Record of Decision, Final Environmental Impact*

[1] Ironically, just six years earlier, adjacent landowners and the USFS had launched in canoes to study the suitability of the Chattooga River for protection under the Wild and Scenic Rivers Act.
[2] From "Capacity and Conflict on the Upper Chattooga River" 2007, page 16.

Statement and Revised Land and Resource Management Plan for the Sumter National Forest (the "ROD"). Over the written objections of American Whitewater and more than 1000 private whitewater boaters, the ROD re-instituted a total ban on all canoeing, kayaking and rafting on the Headwaters—including the portion of the Headwaters flowing through the Ellicott Rock Wilderness, a spectacular natural wilderness that is also protected under the Wilderness Act for wilderness compliant uses like hand-powered floating.

B. Administrative Appeal

On April 15, 2004, American Whitewater administratively appealed a discrete portion of the ROD, known as "Issue 13," which prohibited boating on the Headwaters.

On April 28, 2005, Gloria Manning, as Reviewing Officer for the Chief of the USFS, issued an administrative appeal decision favorable to American Whitewater. Reasoning that the ROD had demonstrated *no basis* for the floating ban, the administrative appeal decision "reversed" the discrete portion of the ROD that banned floating on the Headwaters, and ordered the USFS to conduct a "user capacity analysis" on the Headwaters. The decision further ordered the Regional Forester to include whitewater boating in the study, and to issue a new ROD within two years.

C. Post-Administrative Appeal

In an effort to comply with the order to conduct a "user capacity analysis," the USFS hired several outside consultants to conduct various analyses of the Headwaters corridor. Confusingly, the bulk of these "user capacity analysis" efforts have focused on issues other than whitewater boating, despite the limited focus of American Whitewater's appeal. For example, the USFS has expanded the scope of its analysis to include a variety of issues related to the Headwaters corridor generally, such as the location and condition of official and user-created trails and campsites, trash, parking, angling studies, woody debris and other general management issues.

In addition, a portion of the "user capacity analysis" focused on a perceived "conflict" between boaters and anglers despite the fact that the relevant USFS studies found no empirical evidence of any such conflict. Instead of simply restoring floating access for two or more years to determine whether any conflicts or capacity issues actually exist (as American Whitewater had recommended), the USFS has instead spent untold amounts of time and money hypothesizing about conflicts and capacity issues that "might" occur.

Amazingly, out of more than 800 days of purportedly studying the Chattooga Headwaters in response to American Whitewater's appeal of the boating ban, the USFS has only permitted (or studied) whitewater boating on the Headwaters on two days. On January 5-6, 2007, the USFS conducted a boating trial to determine whether whitewater boating remains an outstandingly remarkable form of recreation on the Chattooga Headwaters.[3] The results of that trial, as embodied in the relevant USFS study report, overwhelmingly confirm that whitewater

[3] In connection with these comments, please consider the comments submitted by American Whitewater in connection with the USFS boating report, as well as the other American Whitewater comments referenced on Exhibit 2 hereto, which comments are incorporated herein for all purposes.

boating remains a viable, important and outstanding form of recreation on the Headwaters, and must therefore be protected and enhanced under the Wild and Scenic Rivers Act[4]:

- The Chattooga Cliffs Reach received an overall rating from paddlers of 6.4 on a scale of 1-7.
    - "The boaters found that the advantages of the Chattooga Cliffs reach include: incredible aesthetics, narrow canyon, waterfalls, challenging rapids, expedition-style boating more than a typical whitewater trip, and to be physically challenging."
    - "The panel members stated there were no similar rivers with these characteristics in the region."
    - "The boaters found Chattooga Cliffs to be a unique slot canyon."
- The Ellicott Rock Reach received an overall rating from paddlers of 6.7 on a scale of 1-7.
    - "The boaters stated that the advantages of the Ellicott Rock run included: lots of read-and-run Class 4 ledges and boulder gardens, continuous rapids, no portages required, few scouts, great scenery, available at a broad range of flows, and an easy shuttle … The boaters stated that overall the run is unique for its wilderness and other attributes…"
- The Rock Gorge Reach received an overall rating from paddlers of 6.5 on a scale of 1-7.
    - "The boater panel characterized advantages of the Rock Gorge/Nicholson run at these flows to include: exploratory wilderness feel, safe, easy rescues, easy portages, and that the hydraulics were not very powerful."
    - "The boater panel members stated that important attributes of the run include: wilderness setting, aesthetics, little evidence of visitor use, beautiful canyon walls/cliffs, length (long), remote feel, and easy access."
    - "The boaters considered the reach to be a very unique run…"

Restoration of boating access was also supported by the following conclusions reached by the boating study:

- The entire Upper Chattooga River is safely navigable and boatable
- The paddling experience provided by the Headwaters is truly outstanding and remarkable

4 Bulleted points from the: UPPER CHATTOOGA RIVER PHASE I DATA COLLECTION: EXPERT PANEL FIELD ASSESSMENT REPORT, February 2007, by Louis Berger Group.

- Existing river access is adequate to support public use, i.e. there is no need to create new parking, access points or trails to restore whitewater boating access

- Boating use is anticipated to be minimal, especially relative to other uses

- Boating use is anticipated to have no unique measurable impacts on the resource

- Boating use will potentially overlap with other recreational use on less than 20% of days, while actual backcountry encounters will occur on vastly fewer days still, i.e., restoration of unlimited whitewater boating access would not change the status quo *at all* 292 of 365 days out of the year

- On days with boatable flows, boaters are unlikely to see other users in the backcountry of the Headwaters, and other users are similarly unlikely to see boaters

In short, the boating study concluded that there is absolutely no justification for limiting, much less prohibiting, boating on any section of the Chattooga Headwaters.

D. USFS Alternatives

Having decided that sufficient data had been collected to make a new management decision on whitewater boating, on August 14, 2007, the USFS published a scoping letter containing a package of proposed management alternatives ("USFS Alternatives") relating to the Headwaters. Notwithstanding that the boating trial unequivocally established that floating access remains a recreation value to be protected and enhanced on the Headwaters, five out of six proposed USFS Alternatives fail to protect or enhance whitewater boating. In fact, half of the alternatives (3 of 6) *completely ban* whitewater boating on all sections of the Headwaters, and two more completely ban boating on some sections of the Headwaters. To make matters worse, the proposed USFS Alternatives confusingly intermingle a host of other complex management issues with no semblance of order. For example, each of the six proposed USFS Alternatives attempts to tackle the issue of boating access along with the location and condition of official and user-created trails and campsites, trash, parking, woody debris, permitting for other recreation opportunities, and other management issues. American Whitewater addresses these and other deficiencies below in its critique of the proposed USFS Alternatives.

II. Critique of Proposed USFS Alternatives

A. Problems Associated with all USFS Alternatives

All of the proposed USFS Alternatives are deficient for the following reasons:

1. <u>All alternatives must protect and enhance whitewater boating</u>

Federal law requires the USFS to "protect and enhance" the values that caused the Chattooga Headwaters to be protected under the Wild and Scenic Rivers Act. The USFS was deficient in complying with applicable law between 1976 and 2004 because, during that time period, it banned one of the very outstanding recreation opportunities it was required to protect

and enhance: whitewater boating. The USFS has now found that the reason it was deficient in complying with applicable law is unknown because the public record relating to management during that period is insufficient and the anecdotal evidence collected is conflicting and in many cases unreliable.

Citing a handful of "unknowns," such as *possible* problems with safety and solitude, the USFS again purported to ban boating on the headwaters in 2004. However, in 2005, the USFS Chief reversed the 2004 boating ban, reasoning: "After careful review of the record … I am reversing the Regional Forester's decision to continue to exclude boating on the Chattooga WSR above Highway 28. I find the Regional Forester does not provide an adequate basis for continuing the ban on boating above Highway 28. Because the record provided to me does not contain the evidence to continue the boating ban, his decision is not consistent with the direction in Section 10(a) of the WSRA or Sections 2(a) and 4(b) of the Wilderness Act or agency regulations implementing these Acts."

More than two years and two million dollars later, the USFS has made two critical determinations related to boating: (1) the USFS's January 2007 boating trial confirmed what Congress knew in the early 1970's: whitewater boating remains a viable, important and outstanding recreation opportunity on the Chattooga Headwaters; and (2) there is no data indicating that any direct limits on whitewater boating are currently warranted (beyond general limits that might be placed on all users of the Headwaters corridor, such as group size and self-registration permitting).

Based upon the USFS's own capacity analysis study, therefore, all alternatives relating to whitewater boating access must restore, protect and enhance whitewater boating on the Headwaters.

2. <u>Alternatives should recognize high use frontcountry areas and low use backcountry areas as different</u>

Several areas in the corridor have relatively high levels of use because of easy access, camping availability, and fisheries management designed to increase use. The USFS should recognize that the management goals, user expectations, standards, and capacities in these locations are different than backcountry areas. For example, visitors to a campground, bridge, or delayed harvest reach expect to see significantly more users than visitors to a backcountry area. We therefore propose that these higher use areas be delineated and managed differently than the rest of the corridor.

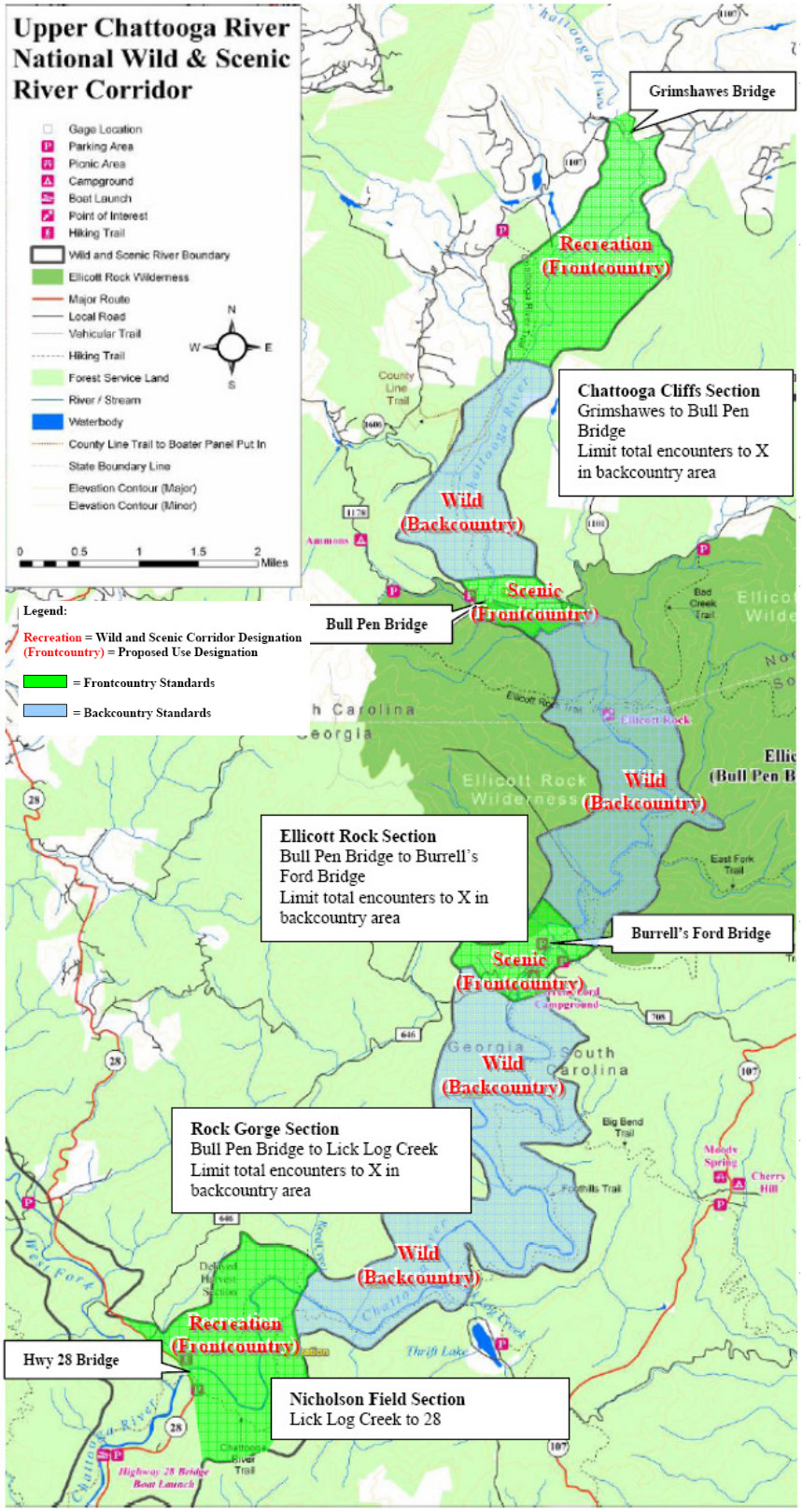
We propose higher use "frontcountry" areas at:

- Grimshawes Bridge, within the designated "Recreation" Wild and Scenic River Corridor;
- Bullpen Bridge, within the designated "Scenic" Wild and Scenic River Corridor;

- Burrell's Ford Bridge, within the designated "Scenic" Wild and Scenic River Corridor; and

- Within the designated "recreation" Wild and Scenic River Corridor more commonly referred to as the "Delayed Harvest Reach," ending at Highway 28.

These zones would be managed in a manner consistent with management elsewhere of access areas, campgrounds, and natural attractions. See Figure 2 below for a geographic representation of American Whitewater's proposed Frontcountry and Backcounty areas:


Upper Chattooga River National Wild & Scenic River Corridor
Gage Location
Parking Area
Picnic Area
Campground
Boat Launch
Point of Interest
Hiking Trail
Wild and Scenic River Boundary
Ellicott Rock Wilderness
Major Route
Local Road
Vehicular Trail
Hiking Trail
Forest Service Land
River / Stream
Waterbody
County Line Trail to Boater Panel Put In
State Boundary Line
Elevation Contour (Major)
Elevation Contour (Minor)
0 0.5 1 1.5 2 Miles
N
W
E
S
Legend:
Recreation (Frontcountry) = Wild and Scenic Corridor Designation
= Proposed Use Designation
= Frontcountry Standards
= Backcountry Standards
Grimshawes Bridge
Recreation (Frontcountry)
Chattooga Cliffs Section
Grimshawes to Bull Pen Bridge
Limit total encounters to X in backcountry area
Wild (Backcountry)
Scenic (Frontcountry)
Bull Pen Bridge
Ellicott Rock Wilderness
Wild (Backcountry)
Ellicott Rock Section
Bull Pen Bridge to Burrell's Ford Bridge
Limit total encounters to X in backcountry area
Burrell's Ford Bridge
Scenic (Frontcountry)
Wild (Backcountry)
Rock Gorge Section
Bull Pen Bridge to Lick Log Creek
Limit total encounters to X in backcountry area
Wild (Backcountry)
Recreation (Frontcountry)
Hwy 28 Bridge
Nicholson Field Section
Lick Log Creek to 28

3. Alternatives must include a range of use limits for all users

Every USFS Alternative proposes inequitable limits on users without any basis. In fact, the USFS has not proposed a single alternative that treats whitewater boating as equal to all other wilderness compliant uses. In USFS Alternatives 1-5 paddling is limited more than all other uses. Even Alternative 6 limits group sizes for paddlers more than other users. There is no basis in the record for this distinction. Absent data demonstrating a need to directly limit a particular type of use, the USFS Chief has already directed the USFS to apply any use limits equitably among users: "If it becomes necessary to limit use, 'ensure that all potential users have a fair and *equitable* chance to obtain access to the [Headwaters]'." The USFS Chief also instructed the USFS as follows:

> While there are multiple references in the record to resource impacts and decreasing solitude, these concerns apply to all users and do not provide the basis for excluding boaters without any limits on other users.

Therefore the manner in which the USFS Alternatives discriminatorily treat boating is inconsistent with the direction of the USFS Chief and is inconsistent with the federal law cited in the USFS Chief's administrative appeal decision on this matter. Based upon the results of the Boating Study, boating is unquestionably an outstanding recreational use of the Headwaters that must be protected and enhanced.

4. Alternatives must be based on a capacity for all users and/or individual uses

How many anglers, hikers, boaters, campers, and swimmers are too many? Unless there are too many present, use should not be limited. Period. This core principal of recreational management is totally lost in the USFS Alternatives. Each alternative should clearly state capacities designed to provide different types of experiences, and propose actions for if and when those capacities are exceeded. The USFS Chief has also directed the USFS in this process to comply with the following USFS regulations: "limitation and distribution of visitor use should be based on "periodic estimates of capacity in the forest plan" (FSM 2323.14)."

5. Alternatives must include indirect limits prior to direct limits

USFS policy is clear that indirect measures of limiting use should be implemented prior to implementing direct measures. The USFS Chief has expressly instructed the USFS in this process as follows: "Agency policy for wilderness echoes law and policy relative to maximizing visitor freedom, directing that 'direct controls and restrictions' be minimized, and that controls are to be applied only as necessary to protect the wilderness resource after indirect measures have failed (FSM 2323.12)."

6. Alternatives, to the extent they address angling, must address stocking

The Integrated Report notes that over 70,000 exotic fish are stocked into the Chattooga River each year for recreational purposes, mostly in the Headwaters. This activity has been proven to have significant ecological impacts, as noted in our Comments on the Integrated

Report. The USFS cannot ignore this significant impact. There should be a range of alternatives regarding stocking, and the impacts of continued stocking should be assessed as part of every such alternative. The analysis must include the direct ecological impacts of stocking as well as the ecological and social impacts that result from increased recreational angling use caused by stocking.

7. Alternatives should consider impacts of management decisions on recreationists, equally with impacts those recreationists may have on one another

Imposing harsh limits on recreationists dramatically impacts those users. Paddlers' protected solitude and experience on the Upper Chattooga have been completely eliminated for more than thirty years. The proposed USFS Alternatives fail to adequately weigh the severity of total elimination of a protected use (on any portion of the Headwaters corridor) against the alleged impacts of that use on other users.

B. Problems Associated with Specific USFS Alternatives

1. Deficiencies in USFS Alternative #1 (No-action alternative)

While the USFS may feel compelled to always include a "no-action" alternative in its NEPA processes, the USFS Alternative #1 is nevertheless unacceptable here because:

- It violates applicable law. As set forth in the USFS Chief's decision: "the Regional Forester's decision to continue to exclude boating on the Chattooga WSR above Highway 28 …. is not consistent with the direction in Section 10(a) of the WSRA or Sections 2(a) and 4(b) of the Wilderness Act or agency regulations implementing these Acts."

- The alternative will not support the USFS's stated desired conditions. By banning one of the primary intended recreational uses, the recreation ORV is not protected or enhanced. By eliminating all ORV's in the upper 1.7 miles of the river the ORV's are not protected. By eliminating boating, boaters' personal sense of solitude away from modern life is eliminated. The solitude felt while floating down a river is special and unique for those who seek it out. This alternative has NO protections for solitude because it has no encounter standards, monitoring, or controls. There is NO evidence that the presence of paddlers will significantly impact the solitude of other users in any unique way, and an overwhelming body of evidence that paddlers will not significantly or uniquely impact the solitude of others. The USFS does not provide a wilderness experience for paddlers – whose true Wilderness experience can only be achieved in a boat, through one of the most low-impact and intimate ways of interacting with nature. The USFS does not provide a true Wilderness experience for any users because boating is a core part of Wilderness where it is possible. The alternative fails to limit or monitor use to assure that Wilderness

encounter standards are maintained. This alternative has had proven detrimental effects to the scenery and setting including trash, huge campsites, erosion, user created trails, tree damage, riparian trampling, and the artificial stocking. This alternative has proven inadequate at protecting the natural resources that make this place special. Nothing in this alternative protects any of the desired conditions in the uppermost 1.7 miles of the corridor.[5]

- It confuses the issue of restoring boating access by including a random assortment of other management issues.

- Alternative 1 has prevented multiple generations from experiencing the Chattooga River from their canoes, kayaks and rafts. This management has had a devastating effect on Chattooga River paddlers – resulting in a 100% elimination of their experience for more than three decades. While existing users of the upper Chattooga River have had no limits imposed on their activities whatsoever – boating has been totally excluded. There is no basis for a capacity of zero paddlers on any or all sections of the upper Chattooga.

- Alternative 1 has resulted in a 12+ year conflict over the issue, and created one of the most contentious and costly river recreation management issues in history. Alternative 1 has failed every day for over 31 years.

- Alternative 1 fails to provide capacities for total use, capacities for all individual uses, or standards on which management actions will be based. Under Alternative 1, hiking, angling, and swimming could occur in vast numbers with no management triggers designed to protect the river or the recreational experience it provides. Without capacities and standards, Alternative 1 provides no guarantee of protection of the Chattooga's ORV's—and completely eliminates one of them (whitewater boating recreation).

- Alternative 1 fails to limit or treat wilderness compliant uses equitably as required by the USFS Chief's appeal decision.

---

[5] "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." USFS Scoping Package, file code 1920-2

- Alternative 1 fails to "maximize visitor freedom in wilderness" as USFS policy demands. A ban on boating is the polar opposite of maximizing freedom.

- Alternative 1 fails to implement indirect use limitations prior to implementing the harshest possible direct limit on a single user group.

- Alternative 1 fails to protect any Outstanding Remarkable Values of the uppermost 1.7 miles of the Chattooga River. By banning boating, the alternative eliminates what may be the only option for protecting and enhancing recreation – *or any ORV* - in this reach because recreationists can only enjoy most of this reach by boat due to private property and geographic impediments. We remind the USFS that the Wild and Scenic studies and the congressional intent behind designation clearly intended that Grimshawes Bridge be the put-in for floating down the Chattooga River below that point. Figure 1, from the original USFS WSR studies reflects that fact. Alternative 1 thus fails to follow the congressional intent of designation and the USFS's own description of the "recreation" ORV in this "recreation" designated river reach.[6] The USFS has the authority and many would argue the obligation to protect the scenic (i.e., riparian areas and other viewshed areas), water quality, and biophysical conditions in this reach.

- Alternative 1 is unnecessarily divisive in that it maintains gross inequities and entitlements.

- Alternative 1 fails to manage frontcountry and backcountry areas differently, with the exception of one small frontcountry location. The biophysical threats, acceptable biophysical conditions, encounter standards, and management activities differ between designated Wilderness, frontcountry areas, recreation river sections, and wild river sections.

- Alternative 1 is deficient for the reasons set forth in the section above entitled "*Problems associated with all proposed USFS Alternatives*."

---

[6] See also "In the management of the Chattooga River as a unit of the National Wild and Scenic River System, one objective will be to provide a recreation experience where a feeling of adventure, challenge, and physical achievement is dominant. In addition a maximum of outdoor skills, without comfort or convenience facilities will be provided. **To provide this experience, river access will be primarily by trail, including canoe launch sites. Only three points will have road access—Grimshawes Bridge, Highway 28 bridge, and Highway 76 Bridge**" emphasis added, from: USDA Forest Service—Southern Region. (1971). *Chattooga River as a Wild and Scenic River*.

2. Deficiencies in USFS Alternative #2

Alternative 2 is the only alternative that includes an actual standard that presumably reflects some concept of capacity. However, the 3 encounters per day standard is highly limiting and would trigger an all-user permit system almost immediately, especially if it was applied strictly on every day of the year. In theory this is a worthwhile concept to analyze, however there are significant problems with this alternative that render it unacceptable. Specifically:

- It violates applicable law. As set forth in the USFS Chief's decision: "the Regional Forester's decision to continue to exclude boating on the Chattooga WSR above Highway 28 …. is not consistent with the direction in Section 10(a) of the WSRA or Sections 2(a) and 4(b) of the Wilderness Act or agency regulations implementing these Acts."

- The alternative will not support the USFS's stated desired conditions. By banning one of the primary intended recreational uses, the recreation ORV is not protected or enhanced. By eliminating all ORV's in the upper 1.7 miles of the river the ORV's are not protected. By eliminating boating, boaters' personal sense of solitude away from modern life is eliminated. The solitude felt while floating down a river is special and unique for those who seek it out. There is NO evidence that the presence of paddlers will significantly impact the solitude of other users in any unique way, and an overwhelming body of evidence that paddlers will not significantly or uniquely impact the solitude of others. The USFS does not provide a wilderness experience for paddlers – whose true Wilderness experience can only be achieved in a boat, through one of the most low-impact and intimate ways of interacting with nature. The USFS does not provide a true Wilderness experience for any users because boating is a core part of Wilderness where it is possible.

- It confuses the issue of restoring boating access by including a random assortment of other management issues.

- Alternative 2 provides no boating opportunities on the Upper Chattooga. This management alternative would have a devastating effect on Chattooga River paddlers – resulting in a 100% elimination of their experience. There is no basis for a capacity of zero paddlers on any or all sections of the upper Chattooga.

- Alternative 2 would continue the 12+ year conflict over the ability of citizens to float the river, and one of the most contentious and costly river recreation management issues in history.

- Alternative 2 fails to limit or treat wilderness compliant uses equitably as is required by the binding and relevant Record of Decision.

- Alternative 2 fails to "maximize visitor freedom in wilderness" as USFS policy demands. A ban on boating is the polar opposite of maximizing freedom.

- Alternative 2 fails to implement indirect use limitations prior to implementing the harshest possible direct limit on paddlers and other direct limits on other users.

- Alternative 2 fails to protect *any* Outstanding Remarkable Values of the uppermost 1.7 miles of the Chattooga River. By banning boating, the alternative eliminates what may be the only option for protecting and enhancing recreation in this reach because recreationists can only enjoy most of this reach by boat due to private property and geographic impediments. We remind the USFS that the Wild and Scenic studies and the congressional intent behind designation (see figure 1) clearly intended that Grimshawes Bridge be the put-in for floating down the Chattooga River below that point.[7] Alternative 2 thus fails to follow the congressional intent of designation and the USFS's own description of the "recreation" ORV in this "recreation" designated river reach. The USFS has the authority and many would argue the obligation to protect the scenic (i.e., riparian areas and other viewshed areas), water quality, and biophysical conditions in this reach.

- Alternative 2 is unnecessarily divisive in that it maintains gross inequities and entitlements.

- Alternative 2 fails to manage frontcountry and backcountry areas differently, with the exception of one small frontcountry location. The biophysical threats, acceptable biophysical conditions, encounter standards, and management activities differ between designated Wilderness, frontcountry areas, recreation river sections, and wild river sections.

- We are unsure of what "enhance woody debris recruitment" means specifically, however such a management objective could have significant negative ecological and recreational impacts. Active falling of trees into the river would damage vital riparian function, create stream bank erosion, threaten nearby trees to wind-throw and

[7] See also "In the management of the Chattooga River as a unit of the National Wild and Scenic River System, one objective will be to provide a recreation experience where a feeling of adventure, challenge, and physical achievement is dominant. In addition a maximum of outdoor skills, without comfort or convenience facilities will be provided. **To provide this experience, river access will be primarily by trail, including canoe launch sites. Only three points will have road access—Grimshawes Bridge, Highway 28 bridge, and Highway 76 Bridge**" emphasis added, from: USDA Forest Service—Southern Region. (1971). *Chattooga River as a Wild and Scenic River*.

destabilization of roots, and leave unaesthetic stumps and cut logs in what should be a natural appearing stream. Use of chainsaws or other motorized equipment should not take place in the backcountry. Trees fallen intentionally into the river would also pose a serious risk of death to generations of anglers, swimmers, hikers, and boaters. We support the natural process of trees entering and exiting the river. We cannot support the unnatural addition of wood by human action to a fully functional, natural bedrock and boulder controlled channel with ample complexity and habitat.

- Alternative 2 is barely an alternative at all since the only other option is unlimited use by all non-paddler recreationists. If the USFS is going to analyze a standard of 3 encounters per day, they must also analyze a range of standards that should include at least standards of 6 and 10 encounters.

- We fully support the registration of all users in the W&S corridor. This information will be critical in future management decisions.

- We are not opposed to closing parking lots in the corridor although we see little need or value in doing so, except as a passive measure to limit use naturally.

- While Alternative 2 is aimed at limiting encounters, it also takes the same biophysical measures as Alternative 3 and others. Alternatives should be different.

- Alternative 2 is also deficient because the reasons set forth in the section above entitled "*Problems associated with all proposed USFS Alternatives*."

3. Deficiencies in USFS Alternative #3

This is a radically flawed alternative. Alternative 3's stated objective is to manage biophysical impacts, yet bans floating in the entire river while allowing all other uses to go unlimited and unchecked. This runs counter to all reason and counter to the record.[8] How does banning the lowest impact and smallest use while allowing all other uses to exist unlimited and untracked lead to strong biophysical protection?

Camping is unlimited yet has demonstrated biophysical impacts noted throughout the IR including ground clearing, vegetation damage, fire risk, soil compaction, erosion, human waste, wildlife attraction, and wildlife disturbance.

Hiking and angling are unlimited yet have demonstrated biophysical impacts including vegetation damage, riparian area clearing, soil compaction, user created trail creation,

[8] The USFS Integrated Report (i.e. Capacity and Conflict on the Upper Chattooga River) states on page 57 that "It is relatively rare (because it is usually less effective) to address biophysical impacts through use limits."

erosion, human waste, wildlife attraction, and wildlife disturbance. Furthermore, angling use is encouraged and enhanced through stocking of 70,000 exotic fish which likely have an enormous biophysical impact in and of themselves.

Yet, somehow, this alternative limits only floating use which has so little biophysical impact that it is anticipated to be scarcely measurable.

In addition, Alternative 3 is deficient because:

- It violates applicable law. As set forth in the USFS Chief's decision: "the Regional Forester's decision to continue to exclude boating on the Chattooga WSR above Highway 28 …. is not consistent with the direction in Section 10(a) of the WSRA or Sections 2(a) and 4(b) of the Wilderness Act or agency regulations implementing these Acts."

- Alternative 3 provides no boating opportunities on the Upper Chattooga. This management alternative would have a devastating effect on Chattooga River paddlers – resulting in a 100% elimination of their experience. There is no basis for a capacity of zero paddlers on any or all sections of the upper Chattooga.

- The alternative will not support the USFS's stated desired conditions. By banning one of the primary intended recreational uses, the recreation ORV is not protected or enhanced. By eliminating all ORV's in the upper 1.7 miles of the river the ORV's are not protected. By eliminating boating, boaters' personal sense of solitude away from modern life is eliminated. The solitude felt while floating down a river is special and unique for those who seek it out. This alternative has NO protections for solitude because it has no encounter standards, monitoring, or controls. There is NO evidence that the presence of paddlers will significantly impact the solitude of other users in any unique way, and an overwhelming body of evidence that paddlers will not significantly or uniquely impact the solitude of others. The USFS does not provide a wilderness experience for paddlers – whose true Wilderness experience can only be achieved in a boat, through one of the most low-impact and intimate ways of interacting with nature. The USFS does not provide a true Wilderness experience for any users because boating is a core part of Wilderness where it is possible. The alternative fails to limit or monitor use to assure that Wilderness encounter standards are maintained.

- Alternative 3 would continue the 12+ year conflict over the ability of citizens to float the river, and one of the most contentious and costly river recreation management issues in history.

- It confuses the issue of restoring boating access by including a random assortment of other management issues.

- Alternative 3 has no physical carrying capacity or standards for any user group and is therefore flawed.

- Alternative 3 fails to limit or treat wilderness compliant uses equitably as is required by the binding and relevant Record of Decision.

- Alternative 3 fails to "maximize visitor freedom in wilderness" as USFS policy demands. A ban on boating is the polar opposite of maximizing freedom.

- Alternative 3 does not track use to determine trends and therefore leaves biophysical resources at risk of overuse.

- Alternative 3 fails to implement indirect use limitations prior to implementing the harshest possible direct limit on paddlers.

- Alternative 3 fails to protect *any* Outstanding Remarkable Values of the uppermost 1.7 miles of the Chattooga River (including biophysical conditions). The USFS has the authority and obligation to protect the scenic (i.e., riparian areas and other viewshed areas), water quality, and biophysical conditions in this reach.

- Alternative 3 is unnecessarily divisive in that it maintains gross inequities and entitlements.

- Alternative 3 fails to manage frontcountry and backcountry areas differently, with the exception of one small frontcountry location. The biophysical threats, acceptable biophysical conditions, and management activities differ between designated Wilderness, frontcountry areas, recreation river sections, and wild river sections. This should be factored into any alternative.

- We are unsure of what "enhance woody debris recruitment" means as referenced in Alternative 3, however this alternative element could have significant ecological and recreational impacts. Active falling of trees into the river would damage vital riparian function, create stream bank erosion, threaten nearby trees to wind-throw and destabilization of roots, and leave unaesthetic stumps and cut logs in what should be a natural appearing stream. Use of chainsaws or other motorized equipment should not take place in the backcountry. Trees fallen intentionally into the river would also pose a serious risk of death to generations of anglers, swimmers, hikers, and boaters. While we support the natural process of trees entering and exiting the river, we cannot support addition of wood to a functional, natural, and largely bedrock and boulder controlled channel with ample complexity and habitat.

- Alternative 3 is also deficient for the reasons set forth in the section above entitled "*Problems associated with all proposed USFS Alternatives*."

4. Deficiencies in USFS Alternative #4

- It violates applicable law. As set forth in the USFS Chief's decision: "the Regional Forester's decision to continue to exclude boating on a portion of the Chattooga WSR above Highway 28 …. is not consistent with the direction in Section 10(a) of the WSRA or Sections 2(a) and 4(b) of the Wilderness Act or agency regulations implementing these Acts."

- This alternative totally bans boating on the Rock Gorge, Delayed Harvest, and private reaches – making it wholly unacceptable. There is no justification for these boating bans whatsoever, and no evidence that there is a zero capacity for recreational boating on these reaches.

- The alternative will not support the USFS's stated desired conditions. By banning one of the primary intended recreational uses on several sections and on most days, the recreation ORV is not protected or enhanced. By eliminating all ORV's in the upper 1.7 miles of the river the ORV's are not protected. By eliminating boating, boaters' personal sense of solitude away from modern life is eliminated. The solitude felt while floating down a river is special and unique for those who seek it out. This alternative has NO protections for solitude because it has no encounter standards, monitoring, or controls. There is NO evidence that the presence of paddlers will significantly impact the solitude of other users in any unique way, and an overwhelming body of evidence that paddlers will not significantly or uniquely impact the solitude of others. The USFS does not provide an adequate wilderness experience for paddlers – whose true Wilderness experience can only be achieved in a boat, at flows and seasons of their choosing, through one of the most low-impact and intimate ways of interacting with nature. The USFS does not provide a true Wilderness experience for any users because boating is a core part of Wilderness where it is possible. The alternative fails to limit or monitor use to assure that Wilderness encounter standards are maintained. Nothing in this alternative protects any of the desired conditions in the uppermost 1.7 miles of the corridor.

- Alternative 4 would continue the 12+ year conflict over the ability of citizens to float the river, and one of the most contentious and costly river recreation management issues in history.

- Alternative 4 has no physical carrying capacity or standards for any user group, except group size for paddlers on 2 of 5 reaches, and is therefore flawed.

- It confuses the issue of restoring boating access by including a random assortment of other management issues.

- Alternative 4 fails to limit or treat wilderness compliant uses equitably.

- Seasonal and water level based closures on this section do not "maximize visitor freedom" as should occur in wilderness areas.

- Alternative 4 fails to implement indirect use limitations prior to implementing harsh direct limits on paddlers.

- Alternative 4 fails to protect any Outstanding Remarkable Values of the uppermost 1.7 miles of the Chattooga River. By banning boating, the alternative eliminates what may be the only option for protecting and enhancing recreation – *or any ORV* - in this reach because recreationists can only enjoy most of this reach by boat due to private property and geographic impediments. We remind the USFS that the Wild and Scenic studies and the congressional intent behind designation clearly intended that Grimshawes Bridge be the put-in for floating down the Chattooga River below that point. Figure 1, from the original USFS WSR studies reflects that fact. Alternative 4 thus fails to follow the congressional intent of designation and the USFS's own description of the "recreation" ORV in this "recreation" designated river reach. The USFS has the authority and many would argue the obligation to protect the scenic (i.e., riparian areas and other viewshed areas), water quality, and biophysical conditions in this reach.

- Alternative 4 is unnecessarily divisive in that it maintains gross inequities and entitlements.

- Alternative 4 fails to manage frontcountry and backcountry areas differently. The biophysical threats, acceptable biophysical conditions, and management activities differ between designated Wilderness, frontcountry areas, recreation river sections, and wild river sections. This should be factored into any alternative.

- Alternative 4 limits boating to single capacity craft. The USFS has no information that indicates tandem canoes, tandem inflatable kayaks, or 2-4 person rafts are unacceptable on these reaches. This limit is arbitrary.

- Alternatives 4 and 5 limit paddling to four groups per day. The only other alternative is zero groups per day. We expect a broader range of group numbers for analysis.

- This alternative limits floating to only December through March in the Ellicott Rock section. This limit is without basis. It does not prevent overlap with other in-stream river users, and forces paddlers to only enjoy the river on relatively cold, short days.

- This alternative limits paddling the Ellicott Rock section to above 400 cfs at Burrell's Ford. This limit totally eliminates significant boating opportunities without basis, and forces paddlers to explore a river under unnatural constraints that may reduce personal safety.

- The alternatives state that group number will be managed through "self-registration only until records indicate the maximum number of groups is exceeding four; then permits in advance." The alternative fails to mention the number of days per year on which groups exceed four that will actually trigger permits. 1 day per year, 20 days per year, 20 days per year for 3 consecutive years?

- This alternative has a trigger for permits to be required, however offers no details on these permits. We are aware of no other permit system on a small flashy headwater creek run – and cannot envision one that would not result in lost paddling opportunities purely due to delays within the system. The alternative should describe this in greater detail.

- This alternative includes "limited wood removal." We are unsure of what this means but we are concerned. There are ways of responsibly managing wood in rivers to support ecological and recreational values but they are not captured under the title "limited wood removal." We would prefer that two wood alternatives be analyzed, 1) allow natural processes to manage wood (prohibit removal and additions), and 2) actively manage wood to protect and enhance ecological and recreational values. Boating does not require wood removal and alternatives should not infer this.

- Alternatives that allow boating should acknowledge that portaging and scouting may occur in some predictable locations. In these locations, the IR confirms that boaters only exited the river channel once during the expert panel study, and predicts that less than 500 feet of trail would be necessary to support paddling.

- Alternative 4's stated objective is to manage biophysical impacts, yet bans floating on three river reaches while allowing all other uses to go unlimited. This runs counter to all reason. Camping is unlimited yet has demonstrated biophysical impacts noted throughout the IR including ground clearing, vegetation damage, fire risk, soil compaction, erosion, human waste, wildlife attraction, and wildlife disturbance. Hiking and angling is unlimited yet have demonstrated

biophysical impacts including vegetation damage, riparian area clearing, soil compaction, user created trail creation, erosion, human waste, wildlife attraction, and wildlife disturbance. Angling is enhanced through stocking of 70,000 exotic fish which likely has an enormous biophysical impact. Yet, somehow, this alternative limits only floating which has so little biophysical impact that it is anticipated to not even be measurable. This is a radically flawed alternative. How does banning the lowest impact and smallest use while allowing all other uses to exist unlimited and untracked lead to strong biophysical protection? How is the paddling ban part of this alternative? There is simply no logical rationale for including a boating ban in this alternative.

- Alternative 4 would allow some reaches to be floated but would prohibit a complete run of the entire Chattooga River which is a unique 50+ mile multi-day paddling opportunity that is possible nowhere else in the region.

- We fully support the registration of all users in the W&S corridor. This information will be critical in future management decisions.

- Alternative 4 is also deficient for the reasons set forth in the section above entitled "*Problems associated with all proposed USFS Alternatives*."

5. <u>Deficiencies in USFS Alternative #5</u>

- It violates applicable law. As set forth in the USFS Chief's decision: "the Regional Forester's decision to continue to exclude boating on a portion of the Chattooga WSR above Highway 28 …. is not consistent with the direction in Section 10(a) of the WSRA or Sections 2(a) and 4(b) of the Wilderness Act or agency regulations implementing these Acts."

- It confuses the issue of restoring boating access by including a random assortment of other management issues.

- We are aware of no reason to ban floating below Lick Log Creek, especially given that congress clearly intended for this use to be protected and enhanced.

- The alternative will not support the USFS's stated desired conditions. By banning on one reach and at some flows throughout the river, one of the primary intended recreational uses, the recreation ORV is not protected or enhanced. By eliminating all ORV's except recreation in the upper 1.7 miles of the river the ORV's are not protected. By eliminating the freedom of paddlers to select their own preferred

flows, their Wilderness experience is damaged. By eliminating boating on one reach, boaters' personal sense of solitude away from modern life is eliminated from that reach. The solitude felt while floating down a river is special and unique for those who seek it out. This alternative has NO protections for solitude because it has no encounter standards, monitoring, or controls for users. There is NO evidence that the presence of paddlers will significantly impact the solitude of other users in any unique way, and an overwhelming body of evidence that paddlers will not significantly or uniquely impact the solitude of others. The alternative fails to limit or monitor use to assure that Wilderness encounter standards are maintained.

- Alternative 5 would continue the 12+ year conflict over the ability of citizens to float the river, and one of the most contentious and costly river recreation management issues in history.

- Alternative 5 has no physical carrying capacity or standards for any user group, except group numbers for paddlers on 2 of 5 reaches, and is therefore flawed.

- Alternative 5 fails to limit or treat wilderness compliant uses equitably as is required by the binding and relevant Record of Decision.

- Alternative 5 fails to implement indirect use limitations prior to implementing the harsh direct limits on paddlers.

- Alternative 5 does protect a portion of one Outstanding Remarkable Value of the uppermost 2 miles of the Chattooga River. We remind the USFS that the Wild and Scenic studies and the congressional intent behind designation clearly intended that Grimshaw's Bridge be the put-in for floating down the Chattooga River below that point. Alternative 5 thus partially follows the congressional intent of designation and the USFS's own description of the "recreation" ORV in this "recreation" designated river reach.

- Alternative 5 is unnecessarily divisive in that it maintains gross inequities and entitlements.

- Alternative 5 fails to manage frontcountry and backcountry areas differently. The biophysical threats, acceptable biophysical conditions, and management activities differ between designated Wilderness, frontcountry areas, recreation river sections, and wild river sections. This should be factored into any alternative.

- Alternative 5 limits boating to single capacity craft. The USFS has no information that indicates tandem canoes, tandem inflatable kayaks, or

2-4 person rafts are unacceptable on these reaches. This limit is arbitrary.

- Alternatives 4 and 5 limit paddling to four groups per day. The only other alternative is zero groups per day. We expect a broader range of group numbers for analysis.

- This alternative limits paddling the river to above 350 cfs at Burrell's Ford. This limit totally eliminates significant boating opportunities without basis, and forces paddlers to explore a river under unnatural constraints that may reduce personal safety.

- The alternatives state that group number will be managed through "self-registration only until records indicate the maximum number of groups is exceeding four; then permits in advance." The alternative fails to mention the number of days per year on which groups exceed four that will actually trigger permits. 1 day per year, 20 days per year, 20 days per year for 3 consecutive years?

- This alternative has a trigger for permits to be required, however offers no details on these permits. We are aware of no other permit system on a small flashy headwater creek run – and cannot envision one that would not result in lost paddling opportunities purely due to delays within the system. The alternative should describe this in greater detail.

- This alternative includes "limited wood removal." We are unsure of what this means but we are concerned. There are ways of responsibly managing wood in rivers to support ecological and recreational values but they are not captured under the title "limited woody debris removal." We would prefer that two wood alternatives be analyzed, 1) allow natural processes to manage wood (prohibit removal and additions), and 2) actively manage wood to enhance ecological and recreational values. Boating does not require wood removal and alternatives should not infer this.

- Alternatives that allow boating should acknowledge that portaging and scouting may occur in some predictable locations. In these locations the Integrated Report confirms that boaters only exited the river channel only once during the expert panel study, and predicts that less than 500 feet of new trails would be needed to support paddling. The boating alternatives should consider construction of these trails if needed, but also acknowledge that they are not necessary.

- This alternative totally bans boating on the bottom section of the Upper Chattooga below Lick Log Creek - making it wholly unacceptable. We are aware of no justification for this boating ban

whatsoever, and no evidence that there is a zero capacity for recreational boating on this reach. Requiring a long hike-out would unnecessarily impact canoeists, and other paddlers unable to carry a boat up the hill for any reason.

- Alternative 5's stated objective is to manage biophysical impacts, yet bans floating on one river reach while allowing all other uses to go unlimited – and in fact attracting other uses through stocking and fishing regulations. This runs counter to all reason. Camping is unlimited yet has demonstrated biophysical impacts noted throughout the IR including ground clearing, vegetation damage, fire risk, soil compaction, erosion, human waste, wildlife attraction, and wildlife disturbance. Hiking and angling is unlimited yet have demonstrated biophysical impacts including vegetation damage, riparian area clearing, soil compaction, user created trail creation, erosion, human waste, wildlife attraction, and wildlife disturbance. Angling is enhanced through stocking of 70,000 exotic fish which likely has an enormous biophysical impact. Yet, somehow, this alternative limits only floating which has so little biophysical impact that it is anticipated to not even be measurable. This is a radically flawed alternative. How does banning the lowest impact and smallest use while allowing all other uses to exist unlimited and untracked lead to strong biophysical protection? How is the paddling ban part of this alternative? There is simply no logical rationale for including a boating ban in this alternative.

- Alternative 5 combines the Chattooga Cliff's reach and the Rock Gorge with regards to group numbers, which erroneously assumes paddlers will always run both of these sections together. These should be considered 2 reaches.

- Alternative 5 would allow some reaches to be floated but would prohibit a complete run of the entire Chattooga River which is a unique 50+ mile multi-day paddling opportunity that is possible nowhere else in the region.

- We fully support the registration of all users in the W&S corridor. This information will be critical in future management decisions.

- Alternative 5 is also deficient for the reasons set forth in the section above entitled "*Problems associated with all proposed USFS Alternatives*."

6. <u>Deficiencies in USFS Alternative #6</u>

- Alternative 6 does not single out paddlers for different treatment than other users (except for group sizes) and is more equitable. This is a

good thing and is consistent with the Record of Decision that is the root of this environmental analysis. However we see no reason or data to suggest different group sizes.

- It confuses the issue of restoring boating access by including a random assortment of other management issues.

- The alternative will not support the USFS's stated desired conditions. By eliminating all ORV's except recreation in the upper 1.7 miles of the river the ORV's are not protected. This alternative has NO protections for solitude because it has no encounter standards, monitoring, or controls. The alternative fails to limit or monitor use to assure that Wilderness encounter standards are maintained.

- Alternative 6 is not divisive and would begin the process of eliminating the senseless conflicts over the Chattooga's management.

- Alternative 6 would end the 12+ year conflict over the ability of citizens to float the river, and one of the most contentious and costly river recreation management issues in history.

- Alternative 6 would allow the entire Chattooga River to be floated and would allow complete runs of the entire Chattooga River which is a unique 50+ mile multi-day paddling opportunity that is possible nowhere else in the region.

- Alternative 6 does protect a portion of one Outstanding Remarkable Value of the uppermost 2 miles of the Chattooga River. We remind the USFS that the Wild and Scenic studies and the congressional intent behind designation clearly intended that Grimshaw's Bridge be the put-in for floating down the Chattooga River below that point. Alternative 6 thus partially follows the congressional intent of designation and the USFS's own description of the "recreation" ORV in this "recreation" designated river reach.

- However, Alternative 6 has no physical carrying capacity or standards for any user group and is therefore flawed.

- Alternative 6 limits boating to single capacity craft. The USFS has no information that indicates tandem canoes, tandem inflatable kayaks, or 2-4 person rafts are unacceptable on these reaches. This limit is arbitrary.

- This alternative includes "limited wood removal." We are unsure of what this means but we are concerned. There are ways of responsibly managing wood in rivers to support ecological and recreational values but they are not captured under the title "limited woody debris

removal." We would prefer that two wood alternatives be analyzed, 1) allow natural processes to manage wood (prohibit removal and additions), and 2) actively manage wood to enhance ecological and recreational values. Boating does not require wood removal and alternatives should not infer this.

- Alternatives that allow boating should acknowledge that portaging and scouting may occur in some predictable locations. In these locations the Integrated Report confirms that boaters only exited the river channel only once during the expert panel study, and predicts that less than 500 feet of new trails would be needed to support paddling.

- Alternative 6's stated objective is to manage biophysical impacts and encounters, yet offers not a single capacity or standard for any user group or total use. This runs counter to all reason. Camping is unlimited yet has demonstrated biophysical impacts noted throughout the IR including ground clearing, vegetation damage, fire risk, soil compaction, erosion, human waste, wildlife attraction, and wildlife disturbance. Hiking and angling is unlimited yet have demonstrated biophysical impacts including vegetation damage, riparian area clearing, soil compaction, user created trail creation, erosion, human waste, wildlife attraction, and wildlife disturbance. Angling is enhanced through stocking of 70,000 exotic fish which likely has an enormous biophysical impact. There is a capacity of the Chattooga River to support recreation, and Alternative 6 totally ignores this most basic principle.

- Alternative 6 fails to distinguish between frontcountry and backcountry areas. The biophysical threats, acceptable biophysical conditions, and management activities differ between designated Wilderness, frontcountry areas, recreation river sections, and wild river sections. This should be factored into any alternative.

- We fully support the registration of all users in the W&S corridor. This information will be critical in future management decisions.

C. Deficiencies in the Scoping Document Generally

- The Scoping Document (SD) provides that "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."[9] It says nothing of the other districts, and fails to recognize that according to the Integrated Report, "Of the 97 [camp] sites on the Upper River, about 26 (27%) are within 20 feet of the river," and that "The median amount of cleared area was 1,000 square feet" for those sites. Therefore, while the

[9] USFS Scoping Document, Page 2

USFS explanation of their current management indicates protection of the river and management of camping, the reality is quite different. A large number of generally large campsites have been created by users in the riparian corridor without USFS management.

- The SD fails to mention that historical lack of management has resulted in over 19 miles of user created trails in the Upper Chattooga Corridor, which is appalling given that the Headwater is only 21 miles long.[10] Worse yet, these trails have over 90 erosion problems associated with them, and almost 2 miles of the user created trails are within 20 feet of the river.[11] Alternative 1 has created this dire situation – and will not remedy it.

- The SD fails to mention that historical management has included stocking of over 70,000 exotic, non-native, fish each year to the Chattooga River. While this action has benefited anglers interested in catching such fish, it may impact anglers that seek native fish, as well as native organisms including macroinvertebrates, fish, salamanders, and spiders.[12] Moreover, such stocking artificially attracts visitor use, which impacts capacity.

- The SD fails to mention that historical management has resulted in rampant litter of which 142 gallons, or 6.7 gallons per river-mile was found while collecting data for the Integrated Report.[13]

- The SD fails to mention the impacts of existing recreational use on fish and wildlife, or the potential impacts of continued unlimited recreational use.[14]

- The SD fails to mention that the USFS has little to no data on past or existing recreational use levels, encounters, or competition impacts. Absent these data, one cannot reasonably conclude that encounter and competition impacts are not (or are) occurring.

III. American Whitewater's Proposal

It is simply not feasible to combine the myriad complex management issues currently under consideration by the USFS into one set of integrated alternatives. *See generally, the issue-by-issue organization of the 2004 ROD.* There are so many variables, that it would require hundreds or thousands of alternatives to account for all of the various combinations (as the USFS unsuccessfully attempted to do in only six integrated alternatives).

---

[10] Integrated Report, Page 42
[11] Integrated Report, Page 43
[12] AW Comments on the Integrated Report
[13] Integrated Report, Page 46
[14] Integrated Report, Page 51-56

American Whitewater proposes that the USFS address important management issues on an issue-by-issue basis, as is the USFS's custom in Land and Resource Management Plans. The USFS should provide sets of alternatives, organized by issue, that relate to other management changes it seeks to include in this NEPA process; for example the location and condition of official and user-created trails and campsites, trash, parking, angling and hiking access, fish stocking and treatment of woody debris.

Below, American Whitewater proposes a set of three alternatives related to the issue of recreational use. These alternatives are essentially identical with the exception of the standards relied upon for management. Thereafter, American Whitewater briefly outlines other potential alternatives on an issue-by-issue basis.

A. American Whitewater's Proposed Alternatives Related to Recreational Use

1. Nationally Consistent River Management Alternative #1 (**high encounter standard**)[15]

- Restore private, self guided boating on the Headwaters.
- Monitor and mitigate existing and ongoing biophysical impacts of recreational use throughout the Wild and Scenic River Corridor. This action includes standard river resource protection and restoration initiatives including fixing erosion problems, closing or formalizing user created trails, and bringing all campsites and trails up to USFS standards.
- Manage river reaches designated as "Scenic" or "Recreation" as frontcountry areas. Manage river reaches designated as "Wild" as backcountry areas. (See Figure 1)
- Create no new river access parking, roads, or trails.
- Require registration of all corridor visitors.
- Educate users on "Leave No Trace" (LNT), low impact encounter protocols, difficulty of floating reaches, rules and regulations, and water level preferences.
- Implement standard boating safety regulations similar to those in force below Woodall Shoals (life jackets, helmets, appropriate craft).

[15] In alternatives 2 through 4, American Whitewater proposes a simple and commonly used method of protecting the river and assuring that biophysical and recreational standards are not exceeded. This basic concept involves implementing a range of protection and restoration initiatives, as well as recreational regulations, and then allowing wilderness compliant uses to occur until one or more standards are exceeded. Use will then be limited as needed through indirect measures first, followed by direct measures as needed.

- Prohibit the use of single chamber inflatable craft in backcountry areas.

- Prohibit commercial floating use on the entire river above Highway 28.

- Construct up to 500 feet of boating portage trails as needed for resource protection, while closing existing user created trails that are actively eroding or casuing other impacts.

- Implement congruent group size limits for all uses.

Allow capacities of **frontcountry** areas to be defined passively by parking and camping availability. If or when **backcountry areas** exceed **10 group encounters on more than 5% of days** per year, for 3 consecutive years, initiate *Use Reduction Management,* as follows:

Survey visitors to ensure encounter standards represent actual encounter tolerances. If this is the case, then limit use by indirect measures in those specific areas. If not, adjust standards to reflect user tolerances.

If total use or encounter standard violations are primarily attributable to one or more groups, target indirect efforts at those groups first. Indirect measures may include reducing group sizes, altering stocking or fisheries management, education on alternative recreational opportunities, instituting voluntary temporal, spatial or water level based avoidance periods (ie voluntary closures), changing access areas, and/or changing camping opportunities.

If after 2 full years of implementing aggressive indirect measures, standards are still exceeded in specific frontcountry or backcountry areas, limit use by direct measures in those specific areas. If total use or encounter standard violations are primarily attributable to one or more groups, target efforts at those groups first. The most appropriate direct means of limiting use is the requirement of limited permits for entry by all users or for participation in specific activities in specific areas during specific times as justified.[16]

2. Nationally Consistent River Management Alternative #2 (**moderate encounter standard**)

- Restore private, self guided boating on the Headwaters.

- Monitor and mitigate existing and ongoing biophysical impacts of recreational use throughout the Wild and Scenic River Corridor. This action includes standard resource protection and restoration initiatives including fixing erosion problems, closing or formalizing user created trails, and bringing all campsites and trails up to USFS standards.

[16] See Exhibit 1 for an example of a permitting system that could be applied to boating if data ultimately demonstrates a need for implementation of direct limits on whitewater boating.

- Manage river reaches designated as "Scenic" or "Recreation" as frontcountry areas. Manage river reaches designated as "Wild" as backcountry areas. (See Figure 1)

- Create no new river access parking, roads, or trails.

- Require registration of all corridor visitors.

- Educate users on "Leave No Trace" (LNT), low impact encounter protocols, difficulty of floating reaches, rules and regulations, and water level preferences.

- Implement standard boating safety regulations similar to those in force below Woodall Shoals (life jackets, helmets, appropriate craft).

- Prohibit the use of single chamber inflatable craft in backcountry areas.

- Prohibit commercial floating use on the entire river above Highway 28.

- Construct up to 500 feet of boating portage trails as needed for resource protection, while closing existing user created trails that are actively eroding or casuing other impacts.

- Implement congruent group size limits for all uses.

If or when individual **frontcountry** areas meet or exceed **parking and/or camping capacity on more than 10% of days** per year, for 3 consecutive years, limit use by indirect measures in those specific areas. If or when **backcountry areas** exceed **6 group encounters on more than 5% of days** per year, for 3 consecutive years, initiate *Use Reduction Management,* as follows:

Survey visitors to ensure encounter standards represent actual encounter tolerances. If this is the case, then limit use by indirect measures in those specific areas. If not, adjust standards to reflect user tolerances.

If total use or encounter standard violations are primarily attributable to one or more groups, target indirect efforts at those groups first. Indirect measures may include reducing group sizes, altering stocking or fisheries management, education on alternative recreational opportunities, instituting voluntary temporal, spatial or water level based avoidance periods (ie voluntary closures), changing access areas, and/or changing camping opportunities.

If after 2 full years of implementing aggressive indirect measures, standards are still exceeded in specific frontcountry or backcountry areas, limit use by direct measures in those specific areas. If total use or encounter standard violations are primarily attributable to one or more groups, target efforts at those groups first. The most appropriate direct means of limiting

use is the requirement of limited permits for entry by all users or for participation in specific activities in specific areas as justified.[17]

3. Nationally Consistent River Management Alternative #3 (**low encounter standard**)

- Restore private, self guided boating on the Headwaters.
- Monitor and mitigate existing and ongoing biophysical impacts of recreational use throughout the Wild and Scenic River Corridor. This action includes standard resource protection and restoration initiatives including fixing erosion problems, closing or formalizing user created trails, and bringing all campsites and trails up to USFS standards.
- Manage river reaches designated as "Scenic" or "Recreation" as frontcountry areas. Manage river reaches designated as "Wild" as backcountry areas. (See Figure 1)
- Create no new river access parking, roads, or trails.
- Require registration of all corridor visitors.
- Educate users on "Leave No Trace" (LNT), low impact encounter protocols, difficulty of floating reaches, rules and regulations, and water level preferences.
- Implement standard boating safety regulations similar to those in force below Woodall Shoals (life jackets, helmets, appropriate craft).
- Prohibit the use of single chamber inflatable craft in backcountry areas.
- Prohibit commercial floating use on the entire river above Highway 28.
- Construct up to 500 feet of boating portage trails as needed for resource protection, while closing existing user created trails that are actively eroding or casuing other impacts.
- Implement congruent group size limits for all uses.

If or when individual **frontcountry** areas meet or exceed **parking and/or camping capacity on more than 5% of days** per year, limit use by indirect measures in those specific areas. If or when **backcountry areas** exceed **2 group encounters on more than 5% of days** per year, for 3 consecutive years, initiate *Use Reduction Management,* as follows:

[17] See Exhibit 1 for an example of a permitting system that could be applied to boating if data ultimately demonstrates a need for implementation of direct limits on whitewater boating.

Survey visitors to ensure encounter standards represent actual encounter tolerances. If this is the case, then limit use by indirect measures in those specific areas. If not, adjust standards to reflect user tolerances.

If total use or encounter standard violations are primarily attributable to one or more groups, target indirect efforts at those groups first. Indirect measures may include reducing group sizes, altering stocking or fisheries management, education on alternative recreational opportunities, instituting voluntary temporal, spatial or water level based avoidance periods (ie voluntary closures), changing access areas, and/or changing camping opportunities.

If after 2 full years of implementing aggressive indirect measures, standards are still exceeded in specific frontcountry or backcountry areas, limit use by direct measures in those specific areas. If total use or encounter standard violations are primarily attributable to one or more groups, target efforts at those groups first. The most appropriate direct means of limiting use is the requirement of limited permits for entry by all users or for participation in specific activities in specific areas as justified.[18]

B. Basis for USFS Inclusion of American Whitewater's Proposed Alternatives:

- It will protect both the Headwaters itself and the experience of visitors to that resource
- It is equitable and fair
- It will promptly begin easing tensions between user groups
- It is administratively and legally defensible assuming there is support for the standards selected, and will thus save time and money for all involved.
- It is consistent with proven river management on other rivers nationwide.
- It is consistent with USFS policy, the Wild and Scenic Rivers Act, and the Wilderness Act.
- It is consistent with the USFS Chief's administrative appeal decision directing the USFS in this process
- It treats problems that currently exist, and provides a formula for dealing with issues that could arise in the future.
- It is inexpensive, easy, and straightforward to implement.
- It is flexible to highly variable flows, seasons, and other factors.

[18] See Exhibit 1 for an example of a permitting system that could be applied to boating if data ultimately demonstrates a need for implementation of direct limits on whitewater boating.

- It will provide high quality experiences for all users, including providing angling experiences with no boaters present on an average of 80% of days, opportunistic and hassle free boating on days of acceptable flows, camping at clean, private sites, hiking without seeing too many other groups, swimming in un-crowded pools of clean water, and visiting a wild and natural river on which man has a small influence.

IV. Other Important Management Issues and Proposed Alternatives

Based upon the USFS's lines of inquiry during the user capacity analysis process, American Whitewater briefly outlines the following additional management issues related to the Chattooga Headwaters corridor and a range of alternatives for each:

A. Fish Stocking:

- Continue existing stocking rates, species, and locations
- Stock only native species, but continue existing rates[19]
- Reduce stocking rates, and prioritize native species.
- Eliminate helicopter stocking[20]
- Expand stocking to entire river

B. User Created Trails:

- Continue existing management
- Close 33% of user created trails of highest impact and/or lowest use, formalize the remaining 67%
- Close 66% of user created trails of highest impact and/or lowest use, formalize the remaining 34%
- Close all user created trails within 50 feet of the river
- Close all user created trails.

C. In-stream Wood Management:

- Continue current policy
- Promote wood recruitment

[19] See our extensive comments on the impacts of stocking nonnative fish such as rainbow and brown trout in our comments on the USFS Report Titled "Capacity and Conflict on the Upper Chattooga River.
[20] An analysis of the recreational impacts of vehicular intrusion into the corridor via helicopter must be conducted.

- Prohibit all wood removal or addition

- Publish new guidelines on wood management that allow movement of only ecologically low-functioning and recreationally high risk wood pieces only to the degree that allows passage. Educate users on guidelines.

- On the Chattooga, several stakeholders seem to feel that paddling and wood in rivers is inconsistent. Nothing could be farther from the truth. Assessing, paddling, and portaging wood is a fundamental part of the paddling experience on *every* whitewater river. The Boating study showed that current conditions support paddling with limited interaction with in-stream wood. Changes in the amount or distribution of wood cannot be anticipated within the timeframe of the current forest plan, and therefore management must be based on current conditions and be flexible enough to address changes. Current and anticipated conditions do not require active management of wood. The most appropriate management is to educate paddlers on the ecological value that wood plays and either discourage or prohibit wood removal. We should note also that much of the Chattooga Headwaters is high-gradient and bedrock and boulder controlled, and therefore many areas are simply wood transport zones. Impacts of movement of an extremely small percentage of the wood in the system would not be found to have a significant ecological or social impact.[21]

D. Parking

- Maintain existing parking opportunities

- Increase parking capacity by 30%

- Decrease parking capacity by 30%

- Move all parking out of corridor

E. Private Land Corridor

- Continue existing management

- Legally establish USFS right to manage floating through the reach

- Negotiate a recreation easement along the river

- Condemn a recreational easement along the river

- Negotiate a scenic easement along the river

[21] *See* Exhibit 3 (discussing management of wood in rivers).

- Condemn a scenic easement along the river

V. Conclusions

The proposed USFS Alternatives are deficient in many respects. American Whitewater asks that the USFS analyze both the framework and the specific alternatives it has presented in these comments. American Whitewater further asks the USFS to modify its proposed USFS Alternatives relating to whitewater boating access to conform to American Whitewater's proposed alternatives, as set forth above. Of the alternatives presented by the USFS, we prefer #6.

Exhibit 1

Direct Limits on Boating Access: Special Permitting System[22]

The special permitting system outlined below would only be appropriate if, after a sufficient period of data collection on actual boating use, the data shows that the capacity of the Chattooga Headwaters cannot accommodate existing levels of boating use (as opposed to total use of all users), and that indirect measures have failed. The following temporary permitting system could be used by the USFS to directly limit whitewater boating use:

- Paddling trip leaders would have to secure a free permit from the USFS online or via phone for the day they wish to paddle a specific section of the Headwaters (Chattooga Cliffs, Ellicott Rock, and/or the Rock Gorge/Delayed Harvest Reach). Trip leaders may secure permits for multiple sections on the same day.

- The permits will become available at 8am on the day prior to the desired paddling day, and will remain available until filled.

- Permits will be nontransferable and awarded to individual trip leaders and cover that individual's group, the members of which do not have to be named on the permit.

- Group size will be limited to 8 people, and group members must travel together.

- The permit itself will simply be an 8 digit number that paddlers must write on their registration form, which will be available online and/or at the put-in.

- Identity of permit applicants will be positively identified using some means (Driver's License Number, Social Security Number, Valid Credit Card Number, Etc) upon application.

- The USFS will make every effort to detect and prosecute fraudulent permit applications by individuals not actually intending to paddle the river. To this end, individuals may incur two no-shows per year at which point permit applications will no longer be accepted for that year, filing fraudulent permit applications must be made a punishable offence, paddlers must register at access areas as well as securing a permit, the USFS must do spot counts, and the names of trip leaders must be published on the Sumter National Forest website on a monthly basis.

Potential variations to this permit system based upon number of trips include:

Variation A: Permit 12 boating trips per day. (all flows)

Variation B: Permit 8 boating trips per day. (all flows)

[22] Limits should not be imposed on users until standards are reached or exceeded. Doing so causes significant and undue burdens on both the administrating agency and the public. This certainly applies to boating on the Chattooga which we expect to be among the smallest uses in the Headwaters corridor with the smallest impacts.

Variation C: Permit 4 boating trips per day. (all flows)

Variation D: Permit 2 boating trips per day below 285cfs at Burrells Ford, and 8 boating trips per day above 285cfs. In addition to the methodology above, the following permit elements would also be required for Variation D:

- A flow trigger would be set at 285 cfs, roughly the median of the shared flow range.
- The Burrell's Ford gage would have to be online as well as physically readable, and the stage representing 285 cfs would have to be clearly marked on both versions. The gage would have to update online in 15 minute increments.
- The first two permits issued for a given day would be guaranteed, and the remaining 6 would be conditional on flows.
- Conditional permit holders may run the river on the permitted day if the river is running at least 285 cfs at 8am on the permitted day, or if/when it reaches 285 cfs at some point during the day.
- Conditional permit holders that do not run the river on the permitted day will not be penalized with a no-show penalty unless the flow is at or above 285 at 8am on their permitted day.

Exhibit 2

Additional Resources to Consider in Formulation of Final USFS Proposed Alternatives

- American Whitewater's Comments and Suggested Revisions Regarding the Draft Upper Chattooga River Phase I Data Collection Expert Panel Field Assessment Report, dated February 2007, and first made available to the public on April 2, 2007, Respectfully Submitted on April 6, 2007

- American Whitewater's Comments on the "Chattooga River History Project Literature Review and Interview Summary", Respectfully Submitted on April 17, 2007

- American Whitewater's Comments on the USFS Report titled "Capacities on other Wild and Scenic Rivers: seven case studies", Respectfully Submitted on May 7, 2007

- American Whitewater's Comments on the Chattooga Literature Review Report, Respectfully Submitted May 7, 2007

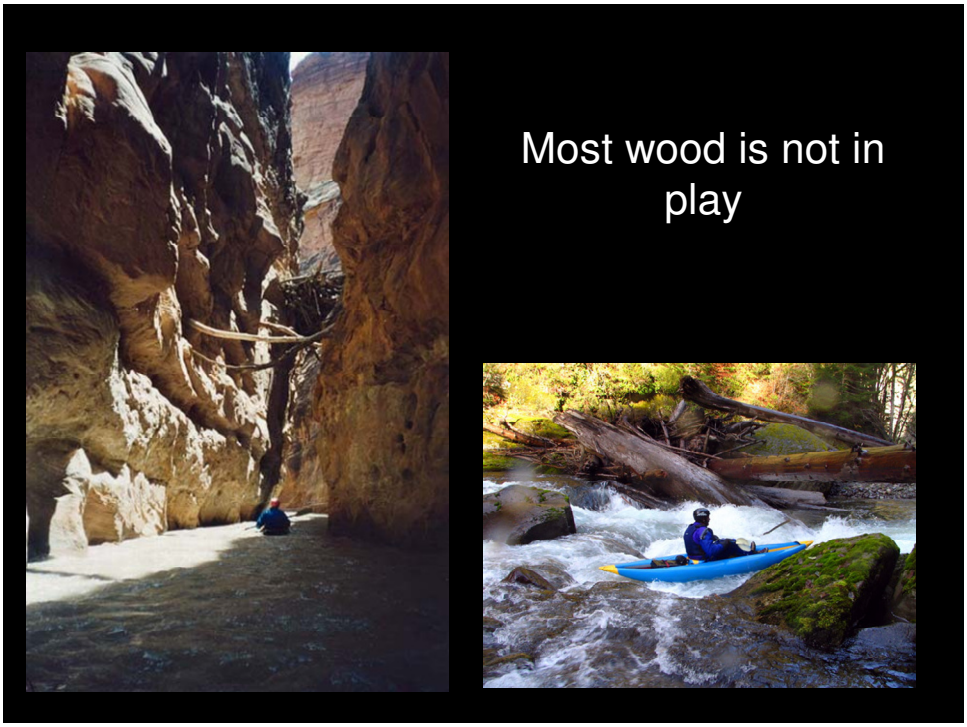
- Comments on the USFS Report Titled "Capacity and Conflict on the Upper Chattooga River", Submitted on July 3rd, 2007

- American Whitewater's Notice of Appeal of the Record of Decision (ROD) for the Sumter National Forest Revised Land and Resource Management Plan (RLRMP) and its accompanying Final Environmental Impact Statement (FEIS).

- DECISION FOR APPEAL OF THE SUMTER NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN REVISION, #04-13-00-0026 American Whitewater, Dated April 28th, 2005.

Exhibit 3

On May 22nd, 2007, American Whitewater's National Stewardship Director, Kevin Colburn participated on a panel discussion at a River Management Society conference that focused on management of wood in rivers. The talk was well attended by river managers from across the country. The following is a synopsis of the talk.



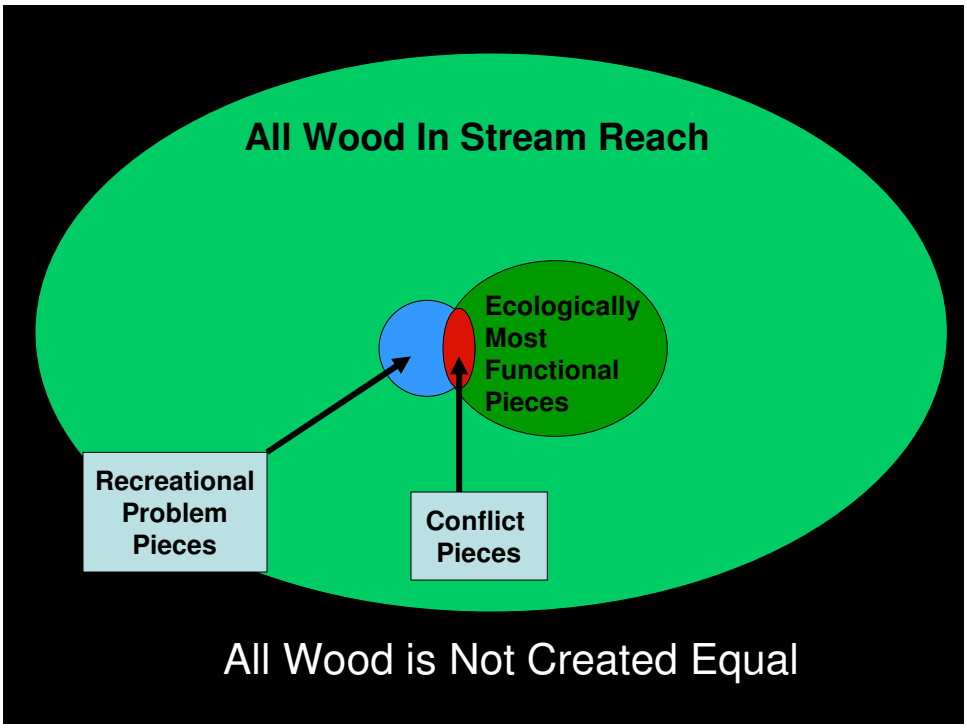
Most wood is not in play: The vast majority of wood pieces in river and riparian systems are not recreationally problematic or especially dangerous to paddlers. Paddlers generally refer to these non-problematic pieces as being "not in play." In general, wood is not in play when it can be paddled under, over, around, or beside without exposing paddlers to unacceptable risks.

Paddling wood is part of paddling: Portaging (or moving) wood requires a significant amount of time and energy, and is avoided by paddlers whenever possible. Therefore many paddlers, especially skilled paddlers, are highly adept at avoiding in-channel wood pieces. When approaching and assessing a piece of wood or accumulation of wood pieces, paddlers are faced with a variety of options:

- Most often a clear route around the wood can be taken, since the majority of wood pieces and accumulations do not completely span the full channel or all channels.
- If at least part of the wood piece or accumulation is partially or fully submerged, paddlers can often paddle over the piece of wood.
- If at least part of the wood piece or accumulation is partially or fully at least two feet above the water level, paddlers can often paddle or push under the piece of wood.

Oftentimes, wood creates interesting and enjoyable challenges for paddlers. Negotiating wood in rivers is viewed as part of the paddling experience. The presence of wood often increases risk, but is viewed as part of the natural ecosystem and natural challenge. Paddling is not inconsistent or in conflict with wood in rivers, rather wood in rivers is a fundamental element of paddling.

Portaging wood is part of paddling: There are situations where for some period of time (ranging from minutes to decades or longer) that wood pieces or accumulations totally block recreational passage. These instances represent a very small percentage of wood pieces in a river system. In these cases, paddlers typically either portage the obstruction or avoid the reach until the obstruction naturally changes enough to allow passage. Portaging wood obstructions is an expected and integral part of the paddling experience, particularly on narrow streams. Wood portages can often be very short and accomplished within the channel.



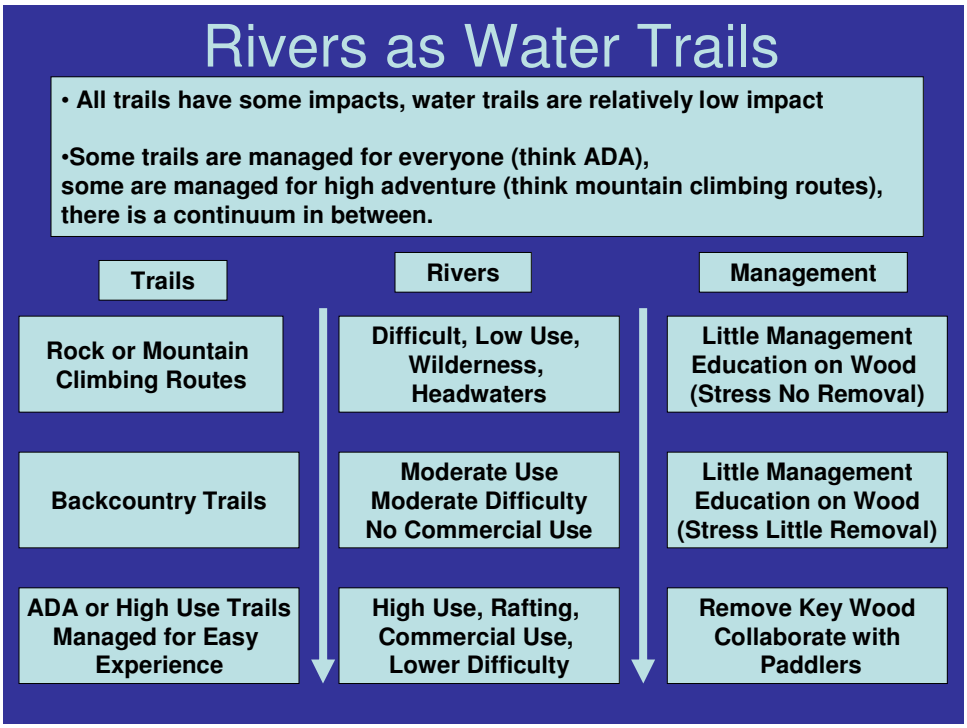
All wood is not created equal: Occasionally, based on a wide range of variables, river managers or users will move wood to allow passage, partially remove wood to allow passage, or fully remove wood to allow passage. Only wood pieces that require portage or pose a serious risk to paddlers' safety are candidates for being moved, partially removed, or fully removed for recreational reasons. In the figure above, these wood pieces are depicted in light blue. River managers and users prefer to alter wood as little as possible due to the significant amount of work that moving wood requires, and due to a shared commitment to maintaining a naturally functioning river environment. Therefore no movement is preferred over any management, movement is preferred over any type of removal, and partial removal is preferred over full removal.

A small percentage of wood pieces in rivers are disproportionately ecologically functional and important. The body of literature describing the factors that contribute to a wood piece or accumulation's ecological value is robust and proven. Wood pieces can provide a variety of stream functions depending on their size, shape, and location in the channel. These functions include sediment trapping, habitat complexity formation, and flow modification. Wood is not a significant food source to aquatic ecosystems as some stakeholders have claimed. In general, wood is most important and functional when the wood piece is large and long, when the log is actively trapping sediment, when the log is adjacent to floodplains, and when the bed and adjacent banks are of a fine substrate. In the figure above, these wood pieces are depicted in dark green.

There may be some pieces that are both ecologically vital and recreationally problematic - but this is a very small percentage of wood pieces - and should be the subject of careful management. In the figure above, these wood pieces are depicted in red.

The light green wood pieces in the figure above are not a concern to recreational river managers because there is no cause for movement or removal by river managers or users. The dark green wood pieces in the figure above are likewise at no risk of removal, but may deserve special attention or management because of their ecological value. The light blue wood pieces in the figure above may be best managed through public education, collaboration, and through typical agency action decision pathways. These pieces may be candidates for movement or removal in some situations as described later in this report. The dark red wood pieces in the figure above may be best managed by agency personnel following defined wood management protocols. These pieces should not be removed except in cases where agencies have formally deemed it the preferred alternative for ecological and/or recreational reasons.

All wood within the effect of a river exists in a dynamic state of decay, wear, and movement. Wood pieces may play a variety of ecological roles throughout their transition from a freshly fallen tree to assimilated molecules. The premise behind the above concept is that the subtle effect of moving as few of the light blue pieces as little as possible, while the light green, dark green, and red pieces remain unmoved, will allow this natural process to proceed at all relevant scales without any significant ecological effects.



Rivers as water trails: River managers may find it useful to think of rivers as extremely low impact trails. Trails are corridors through which people experience nature. It is widely accepted that some form of land trails – while they have some environmental footprint - are suitable in all settings from roadside picnic areas to remote Wilderness areas. With that said, ADA or high use trails are managed very differently from Wilderness trails. Likewise rivers are managed on a continuum of standards aimed at providing different types of experiences that are appropriate for the setting.

This may be a useful analogy in determining wood management practices. Rivers that are difficult, low use, Wilderness, and/or small in size may be analogous to rock or mountain climbing routes. River managers may wish to manage wood in these rivers primarily through educating user groups, and stressing no removal. Moderate use, moderate difficulty, rivers with no commercial use may be analogous to standard backcountry trails. River managers may wish to manage wood in these rivers primarily through educating user groups, and stressing little removal. River managers may also wish to apply some direct management of wood to these reaches. High use, commercially used, rafted, and/or easier rivers may be analogous to ADA or high use managed trails. River managers may wish to work collaboratively with the paddling community to remove wood pieces that are recreationally problematic and not highly ecologically functional. This concept was proposed primarily for discussion purposes. Discussion following the talk pointed out that this is a very oversimplified framework, and that these types of decisions must be made on a case by case basis.

Anglers can learn which fish to eat and which to release.

Paddlers can likewise learn which situations it is more OK or not OK to remove or move wood, and how to best do it.

The role of education: There is often hesitance on the part of river and land managers to encourage the public to participate in active management projects. This has been the case with management of wood, on which there has been little work to educate or include the public in management activities ranging from protection of all wood pieces to limited removal efforts. It is a management hot potato.

With this being said, there is ample precedent for agencies educating the public on how to participate in active management activities in cases where there is little oversight and some basic ecological knowledge required. One example is in the left hand picture above. This man is holding up a federally threatened bull trout, which he will presumably release. Agencies trust anglers to be able to differentiate between game fish and which they can kill and eat, and extremely similar endangered fish which must be handled appropriately and released. Hunters

likewise must be able to tell the difference between game and non-game (coyote and wolf for example) at long distances with lives of endangered species on the line. Even community weed-pulls are examples of agencies educating the public on the value of some organisms while working with them to manage others.

Paddlers are certainly capable of likewise learning which situations it is more OK or not OK to move or remove a piece of wood, and how to do it with the smallest ecological footprint. Educational efforts could be targeted at any chosen wood management practice, including policies enforcing no movement, collaborative movement, or movement of certain types of pieces.

Do Not Move/Remove Log	⟷	More OK to Re/move Log
Ecological Considerations		
Sand, Gravel, Cobble Banks	⟷	Bedrock Banks
Floodplain Adjacent to Channel	⟷	Cliffs Adjacent to Channel
Log Trapping Sediment	⟷	Log Above Water Level
Log is Large and Long	⟷	Log is Small and Short
Stream has Endangered Species	⟷	No Endangered Species
No Riparian Vegetation	⟷	Dense Riparian Vegetation
Heavily Impacted Watershed	⟷	Intact Forested Watershed
Paddling Considerations		
Log is Obvious	⟷	Log is Hidden
Log is Avoidable While Paddling	⟷	Log is Unavoidable
Log is Easily Portaged	⟷	Log is Impossible to Portage
Log Unlikely to Entrap Paddler	⟷	Log Likely to Entrap Paddler
Log in Seldom Paddled Reach	⟷	Log in Popular Reach
Class V	⟷	Class II/III
Wilderness	⟷	Urban

An educational model: Paddlers currently have such a policy that they operate under that was developed in 2001 by Kevin Colburn, and published by American Whitewater on their website and in their journal. The policy educates paddlers on the ecological role that wood plays in river ecosystems, strongly discourages any wood movement, while offering an educational decision model for paddlers considering the movement of a piece of wood. This model offers continuums of both ecological and recreational considerations.