

Submitted to John Cleeves, USFS Chattooga Project Manager, via email on 11/03/06

John,

I am very glad to have the chance to finally see the full study plan. Thank you for sharing this with the public - even though much of the work has already begun. We have always been interested in contributing to the process to make it as good as possible. This document resolves some of our concerns over the bullet-point version of the plan released earlier. In the future we would appreciate the USFS sharing this kind of information before it is too late to comment on and improve. Doing this would save us all alot of frustration. With this being said, we obviously still have differences over the plan...

In general I think that each individual element of the plan will contribute to your ability to manage the river in the future. While I still feel the expert panels are being organized in a way that makes no sense, at this point I just hope that the stars align and we get some basic information collected. I think the efforts to characterize the impacts of current users and to learn what is out there with regards to trails and campsites is critically important and I am glad to see those data being collected. The pieces, in a vacuum, are each worthwhile, but the overarching strategy and plan still concern us.

In general my concerns are that :

- \* As you are well aware, we believe strongly that the current ban on boating (and therefore the study) is illegal in that it lacks any basis, and violates the Wild and Scenic Rivers Act, the Wilderness Act, and other federal laws.
- \* Most of the elements of Phase 1 are focused on how to manage capacity and conflict problems, and are being implemented prior to any compelling evidence that either type of problem even exist. The literature reviews for example will be great academic exercises and will be valuable if any capacity problem exists - but doing these reviews when all evidence points to a total lack of problems is a waste of time and money.
- \* The "Research conducted for the analysis is designed to minimize impacts on current users to the extent possible," however it is designed to inequitably and directly maximize the real impacts on backcountry paddlers. This fails any test of fairness - and continues to undercut our ability to trust that the capacity analysis is intended to be objective and lead to a fair decision.
- \* Framing the decision environment by reviewing "examples of rivers with capacities or other related recreation regulations" and finding "illustrative examples with parallels to Chattooga issues" misses the key fact that there are no limits on private boating use on any other river in the region and it is likely that none will be needed on the Chattooga. We ask that element 1.b also address similar rivers with no use limits. Management of Overflow Creek for example should be one proxy. Once again, why the foregone conclusion?

You could easily characterize our basic comments by stating that Phase 1 and 2 should be - or should have been - reversed, with phase 2 coming first. Doing so would have focused the analysis on only real problems and saved a great deal of time, money, and hassle.

It also would have been more fair, and if done correctly could have not been in violation of federal laws (ie boating could have been allowed during the study). It all comes back to our original primary concern that we brought up in May of 2005 in our first UCA comments: that the baseline of the study must assume all current users plus paddlers are equal and have an equal right to be present in future management. The status quo has been invalidated yet it still holds sway over some elements of the study. With no prior support for the ban, the baseline for management must be a blank slate. Thus, the baseline for the study must similarly start with a fresh look at the resource and its users. We ask that you consider a fair baseline at every step of the remainder of this process.

I have attached a recent LAC wilderness plan for the nearby Cohutta Wilderness, which contains a class III-V whitewater river: <http://www.americanwhitewater.org/content/River/detail/id/488/>. The issues seem very similar to the potential issues Chattooga, and the response to these issues may provide some good insight into options on the Chattooga should any problems with capacity be found. The USFS is segmenting the Cohutta Wilderness into Opportunity Classes recognizing that the river and trail may by definition provide less solitude than untrailed wildlands, and are managing these classes accordingly. They implemented a mandatory permit system for all users and several indirect limits to use by controlling group sizes and the location of campsites. Note that without limiting use numbers or favoring any specific uses they have limited the ecological impacts of use and set up expectations for more contacts in more highly used corridors and seasons - and fewer contacts in other areas. They have not zoned for use type but they have in a way zoned for "experience" of the resource for all users. This is consistent with other management plans in my experience that seek to provide a specific experience for all wilderness compliant user groups.

Applying the Cohutta plan to the Chattooga would require that 1) boating be allowed on all reaches, 2) Opportunity Classes be defined for each reach, 3) campsites and trails be evaluated for standards and closed/hardened as needed 4) group sizes be determined for all activities in all reaches, 4) a mandatory permit system created for all users.

Keep in touch,

Kevin Colburn

ps, please share these with Doug Whittaker so he is aware of our concerns and ideas -  
Thanks.

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