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October 5, 2014

Re: Nantahala and Pisgah National Forest Plan and the Chattooga Wild and Scenic River Comprehensive River Management Plan

Dear Michelle,

I am writing to follow up on updating the Chattooga Wild and Scenic River Comprehensive River Management Plan through the forest planning process. We spoke about this briefly at a recent meeting and I wanted to follow up in writing to keep the conversation going.

The Wild and Scenic Rivers Act requires a managing agency to prepare and regularly update a Comprehensive River Management Plan (CRMP) for each Wild and Scenic River under their care. The Nantahala-Pisgah has three Wild and Scenic Rivers. The Horsepasture River and Wilson Creek both have standalone CRMPs as is the normal practice, which are on their own NEPA schedule. The CRMP for the Chattooga River however is made up of plan components woven throughout the Forest Plans for the three National Forests that manage portions of the river.

The current Nantahala-Pisgah plan revision is an update of the Chattooga River CRMP for the North Carolina portions of the river. This is a good thing. The 2012 amendments relating to paddling contain severe flow, season, and geographical limits on paddling that exist nowhere else on the Forest Service system, and were based entirely on predictions of use levels and impacts that simply never materialized. Forest Service monitoring has now shown that these limits are unnecessary and excessive. (see table below) Consistent with the new planning process it is time to adapt and revise based on monitoring.

Upper Chattooga Paddling Use Over the First Three Seasons of Limited Legal Use				
	Chattooga Cliffs		Ellicott Rock	
	Trips	Paddlers	Trips	Paddlers
2012-2013*	23	79	41	140
2013-2014	2	12	6	19
2014-2015	0	0	8	19

\*The 2012-2013 season was unusually large because of the predicted "latent demand." It was the first time in 36 years paddlers could legally descend the river.

The 2012 Amendments also deemed consideration of paddling "out of scope" on quite a few miles of the Wild and Scenic Upper Chattooga upstream of Green Creek as well as

all tributaries, so there is no basis for current management of these reaches. This must be remedied in the new plan, the scope of which unquestionably covers these areas.

We brought this issue up in our assessment and scoping comments, as well as detailed comments last November following a public meeting, and met with the past Forest Supervisor about it. We remain unaware of how the agency intends to address the CRMP through the forest planning process.

We propose that the Nantahala-Pisgah forest planning process create a relatively simple CRMP for the North Carolina portions of the Wild and Scenic Upper Chattooga that is drafted as an appendix to the Forest Plan. When the other managing Forests update their Forest Plans they can follow suit. When completed, integrating the three appendices into a standard stand-alone CRMP should be relatively straightforward.

Our vision for the CRMP would be at its core a suite of succinct plan components aimed at protecting and enhancing the broad Outstanding Remarkable Values and free-flowing status of the river. Monitoring has shown small amounts of recreational use of the NC portions of the river corridor and we believe that recreational management should be returned to normal, where the public is welcomed to enjoy the river in sustainable ways.

As I write this it would be a beautiful day to be paddling the Upper Chattooga. Flows are perfect for paddling, it is warm and sunny, and the fall colors would be beautiful. It is a Monday and lots of other creeks are running, so chances are no one else would be there - no one at all. The full glory of the Chattooga River's values would be savored and undiminished by any fortunate paddlers today if the activity wasn't banned. Today is emblematic of why the Chattooga boating bans make no sense, and why they need to be eliminated in the new CRMP.

I look forward to working with you on updating the CRMP for the Chattooga Wild and Scenic River.

Sincerely,



Kevin Colburn  
National Stewardship Director  
American Whitewater

Cc:

James Melonas, Acting Forest Supervisor