From: Justin Cullars
To: comments-southern-francismarion-sumter@fs.fed.us
Cc: akimbell@fs.fed.us
Subject:
Date: 07/30/2008 02:03 PM

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

7/30/08

RE: Chattooga River Project Comments

Dear Sumter National Forest,

My name is Justin Cullars, I am a professional video editor who has lived in Knoxville for 10 years, and I've kayaked throughout the world for the past 20+ years.

I Attended the assessment meeting in Clayton Ga. last year and have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposal. Both treat my community of river enthusiasts unfairly and your proposal is not based on any actual user data. Please consider the following concerns I have regarding this issue:

The Office of the Chief of the USFS stated that the original boating ban was baseless and needed to be reassessed. If the original boating ban was baseless, it is logical to assume the new restrictions and bans, without supporting data or analysis are similarly baseless. Again, if the Forest Service has significant quantifiable data to support boating restrictions and bans in the headwaters, please release this information to the public. Otherwise without proof to the contrary, unrestricted boating should be allowed in the headwaters and its tributaries.

The USFS has spent thirteen years searching for a reason to limit paddling on the Chattooga and has found none. It is time to open the river to boating.

- The EA is not a user capacity analysis and does not reference one. The AW appeal decision required a user capacity analysis. Where is it?

- The EA and preferred alternative are not equitable or protective of the river because they considers boating to be the only management variable, while other larger more impactful uses are not seriously considered for limits.

- The USFS preferred alternative includes a total ban on 2/3 of the upper river, a ban on tributary boating, and allows only 0-6 days of limited boating using an inherently flawed "average mean and permit system" on the remaining reach – while allowing all other wilderness conforming existing uses in unlimited numbers.. This is not equitable and not acceptable!

- The EA offers no basis for the boating bans and limits

- The EA is no better or different than the last one, is at least a year late and has wasted millions in tax payer money and many peoples personal time. If this were delivered by a group in the corporate world do you think this would be acceptable?

- The 450 CFS average daily flow trigger in the preferred alternative is a flawed measure that should be eliminated from any considerations. There is no way a paddler can know this number and will be an administrative burden for the agency.

The Forest Service’s recommended management plan, Alternative #4, is heavily flawed and should be withdrawn from consideration in favor of Alternative #8. I find Alternative #8 acceptable, with a few adjustments:

- Allow unrestricted boating on the entire Chattooga River and its tributaries below Grimshawes Bridge.

- Don’t allow rafts. Rafts are not an appropriate boat for the tight nature of the headwaters. Restrict boats to more appropriate water craft such as duckies, kayaks and canoes.

- Allow limited removal of LWD. Removing LWD in locations dangerous to boaters, such as in rapids or swift current increases the safety of the runs without effecting the ecology of the river. The Forest Service has been sent, and has available, a significant amount of data showing that limited LWD removal will not alter the ecology of the river.

- Use a permit, or similar quantifiable tracking system, as the backbone for the “adaptive management approach.”

- Include encounter standards based on a real user capacity study. This can then be used to fairly limit total use when encounter standards are consistently exceeded.

- If the encounter standards are consistently exceeded use indirect measures to limit encounters before reverting to bans or restrictions.

- Ban the introduction of non-native species or plant life in the wilderness areas. The wilderness is not Disneyland to be physically altered or added to for the enjoyment of user groups. It is to be protected in its natural state. Please consider banning the introduction of anything non-native into the wilderness area.

I applaud the Forest Service to offering Alternative #8. It is a flexible and insightful plan that treats all environmentally friendly user groups equally and complies with the Wilderness Act and the Wild and Scenic Rivers Act. I strongly encourage the Forest Service to abandon Alternative #4 and approve an adjusted Alternative #8, as the final management plan.

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Thank you for considering these comments. Please consider conducting a real user capacity analysis

and immediately allowing boating in the same numbers, places, and seasons that you allow existing users. Paddling should be allowed in a similar manner to your alternative number 8, except it should be allowed on the entire Upper Chattooga River and its tributaries and (in the small number of days a year it would happen) whenever conditions allow.

Thank you for considering these comments,

Sincerely,
Justin Cullars

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With Windows Live for mobile, your contacts travel with you.
http://www.windowslive.com/mobile/overview.html?ocid=TXT_TAGLM_WL_mobile_072008