From: nm rusho
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga River
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U.S. Forest Service

Chattooga River Project

4931 Broad River Road

Columbia, SC 29212.

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

28 July 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

I'm a whitewater paddler living in Fayetteville, GA. There's nothing I enjoy more than the peace & quiet of paddling on a beautiful river. I'm very concerned that boaters are being kept off the upper Chattooga while everyone else gets to enjoy it. Why is that? We don't leave behind fishing line & hooks which are dangerous to wildlife. Personally, I strive for no footprint. Why are boaters being singled out?

I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposal. Both treat me and my community of river enthusiasts unfairly and your proposal would not meet my interests. Please consider the following concerns I have regarding this issue:

- 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 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 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
- The USFS hired qualified consultants and then ignored their input
- 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.
- Paddlers prefer an alternative similar to Alternative 8 that 1) fully allows boating on the entire Chattooga River below Grimshawes Bridge, 2) allows

paddling on tributaries, 3) includes encounter standards based on a real user capacity analysis, 4) will *equitably* limit *total* use only when encounter standards are consistently exceeded, and 5) will do so using all available indirect measures first.

- The public should have the right to float on public Wild and Scenic Rivers regardless of who owns the land along the river.
- All aspects of the "Outstanding Remarkable Values" of Wild and Scenic Rivers should be protected on the entire river, not just in some areas.
- Fishermen and boaters coexist on most rivers. Why are boaters being kept off the upper Chattooga?

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 on the *entire* Upper Chattooga River and its tributaries.

Thank you for considering these comments,

Sincerely

Natasha Rusho

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