From: RivieraRatt@aol.com
To: comments-southern-francismarion-sumter@fs.fed.us
Cc: akimbell@fs.fed.us
Subject: (no subject)
Date: 08/18/2008 06:14 AM

PO Box 237
Fairport, NY 14450
August 13, 2008

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

Re: Chattooga River Project Comments

Dear Sir:

I wish to register my comments re. the proposed management plans for Sumter National Forest. I have reviewed the Environmental Assessment re. the management of recreation in the Chattooga River corridor. I find the analysis, as presented, to be seriously flawed and unfairly weighted against the concerns of a legitimate public group, to wit, whitewater paddlers.

Nothing in the Wild and Scenic Rivers Act supports discrimination in favor of one user group against another. While it is true that anglers consider the upper reaches of the Chattooga River to be unique, offering pristine environmental conditions, beauty, and solitude, those very characteristics are among those that whitewater paddlers seek and enjoy. To maintain this public resource for the benefit of fishermen, and the exclusion of paddlers, has no basis in fact, law, or public policy.

Alternative #4 does not treat all user groups equally. In particular, it maintains the status quo in favoring fishermen over whitewater paddlers. Since boats have a smaller impact on the environment (streambed and riparian areas) than do wading fishermen, favoring fishermen over paddlers has no objectively protective impact on the wilderness characteristic of the Chattooga Headwaters.

In addition, Alternative #4 is based on little or no data. There are no publicly available data that provide evidence that allowing whitewater paddlers would constitute a threat to other user groups' experience. During the "Chattooga Headwaters User Capacity Study," Jan. 5-6, 2007, the paddlers did not encounter any other users. This is primarily because whitewater paddlers would use the Upper Chattooga during the winter and extremely rainy times—conditions when other users have little incentive to visit the area.

The proposal within Alternative #4, that boating only be allowed a "daily average mean of 450 cfs" is predicted, is unworkable. Predictions of flow in such a watershed are notoriously error-prone, and relying on a daily average mean (rather than the actual flow at the time of intended use) ignores the impact of ephemeral rain events. These rules would unreasonably restrict paddlers from the watershed during peak boating opportunities, when surely other user groups would have little interest in visiting the Chattooga Headwaters.

I support Alternative #8, with some modifications:
-- Allow unrestricted boating on the entire Chattooga River and its tributaries below Grimshawes Bridge.
-- Restrict rafts from boating in the Chattooga Headwaters. Allow canoes (decked and open) and kayaks (hardshell and inflatable). This is not an area appropriate for rafts.
-- Further, to address fishermen's concerns about crowding with unqualified paddlers, do not allow professionally guided trips or equipment rental in the Headwaters.
-- Employ a permit system, which will enable the Forest Service to survey boaters' use of the Headwaters. After an appropriate period, regulations for paddlers may need to be adjusted, based on user data generated by the initial period of use.
-- Work toward returning the Headwaters to its natural state. This would mean, among other efforts, banning the introduction of non-native plant and animal species to the wilderness area. Introducing non-native species for the enjoyment of one favored group is counter to the concept of a Wilderness Area.

Thank you for this opportunity to comment, and thank you for offering Alternative #8 as an option. Alternative #8 treats all legitimate user groups equally and is truly in keeping with the letter and spirit of the Wilderness Act and the Wild and Scenic Rivers Act.

Yours sincerely,

Matt Muir
PO Box 237
Fairport, NY 14450-0237
matt@americanwhitewater.org

cc: Abigail Kimbell, Chief, U.S. Forest Service
Hillary Rodham Clinton, Senator, New York
Charles Schumer, Senator, New York
Randy Kuhl, Representative, 29th District Of New York
Eric Massa, Democratic candidate for Congress, 29th District Of New York

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