From: Michael Farrell
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: RE: Chattooga River Project Comments
Date: 08/18/2008 06:21 PM

August 18, 2008

Dear Sumter National Forest,

I am a PhD Candidate in geography that lives and attends graduate school in San Diego, CA. My research is based in the McKenzie River watershed in the Three Sisters Wilderness area in the Oregon Cascades. I am familiar with rivers across the United States through both my hydrology research and my whitewater kayaking. My life is dedicated to researching and protecting wild rivers. I am disturbed that both science and logical arguments have been ignored in choosing Alternative 4 as the Preferred Alternative. After years of arbitrary and capricious outlawing of one fully Wilderness-compliant form of recreation, it appears that instead of managing the upper Chattooga in a way that is consistent with the lawful management of rivers throughout the United States, an alternative is favored that, while technically legalizing some paddling, effectively changes little by requiring flawed, arbitrary, and capricious criteria and use restrictions.

My geographic specialization is hydrologic modeling. My work specifically entails predicting streamflows in mountainous streams based on weather conditions. It is my professional opinion that requiring a mean daily flow level as a criterion to establish lawful floating is an undue constraint in the context of a mountain stream that can respond on short time scales to precipitation.

Additionally, as a whitewater paddler, I know that there are thousands of whitewater rivers in the United States that are lawfully paddled without such criteria. In these cases, it is the responsibility of the paddler to become acquainted with the streamflow response of an individual stream and make a "game-time" decision of whether to travel to a river and/or put on. Worrying about whether ideal conditions may drop hours after putting on, and therefore making a given stream's mean daily flow drop below an arbitrary cuttof would result from putting in place a contrived measure of boating suitability.

As an expert in hydrologic modeling, I know of no streamflow prediction method that can predict with certainty if mean daily streamflow will exceed a given threshold. Because of this, experience with practically applied hydroclimatology becomes an important skill for a river runner who paddles streams with natural flow regimes, in addition to general paddling and wilderness skills. When the decision as to whether or not a given day will meet minimum flow criteria is, instead, charged to Forest Service personnel, however, errors of underestimating actual streamflow become an additional, unnecessary obstacle to floating a section of Wilderness river.

As an additional note, using a commercially-rafted stretch of river (ie the lower Chattooga) as validation that allowing paddling (a fully Wilderness-compliant form of travel) on remote and hard-to-access (due to distance or variable flow) streams will cause resource degradation is absurd. I expect that the US Forest Service recognizes that there are thousands of remote stream reaches in the United States that are paddled by kayakers without resembling other stream reaches in which management agencies offer commercial concessions, unnaturally increasing the volume and changing the nature of resource use.

Furthermore, I know of no Wilderness watercourse in the United States in which private kayaking is cited as the cause of resource degradation requiring use limits. Kayaking has a much smaller footprint of impact than foot traffic.

I am not an expert fisherman, but I have gotten out of my kayak, walked upstream to a rapid that was just floated by my party of kayakers, and caught native and planted trout. The myth that kayaking "ruins" fishing is not scientifically valid. In fact, in every other waterway managed by the US Forest Service, kayaking and fishing coexist to the extent allowed by the natural constraints of the stream. I recreate and conduct research in Wilderness Areas managed by the USFS. I understand that solitude is a wilderness virtue. However, requiring unscientific limits to one fully Wilderness-compliant use while requiring NO limits to another use that has greater potential to degrade water quality is truly arbitrary and capricious.

The mandate of the USFS requires you to manage based on a doctrine of multiple-uses. A survey of streams across the United States indicates that remote streams with Wilderness and Wild and Scenic designations do NOT experience resource degradation by kayakers when Wilderness-compliant methods of recreation coexist. I am disappointed that alternative 4 apparently is not based on this reality, but instead by specious hyperbole.

With Respect,

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