From: Shane Benedict
Sent By: shanebenedict2@gmail.com
To: comments-southern-francismarion-sumter@fs.fed.us; akimbell@fs.fed.us
Subject: Chattooga River Project Comments
Date: 08/18/2008 11:07 AM

U.S. Forest Service

Chattooga River Project

4931 Broad River Road

Columbia, SC 29212.

8/18/08

RE: Chattooga River Project Comments

Dear Sumter National Forest,

My name is Shane Benedict. I grew up going to camp on the headwaters of the Chattooga river near Highlands and Cashiers, North Carolina. I later went on to work in the same area for years and now live in Hendersonville, North Carolina. For nearly 30 years I have hiked, biked, climbed, fished, and paddled all over the Chattooga watershed. I feel like I have a strong connection to the Chattooga river. In fact I call it my home away from home. I have explored the upper Chattooga by boat and it is one of the most scenic and remote feeling paddling experiences that I have had in the east. I know that paddlers are one of the least impactful groups and the exclusion or limited inclusion in the use of the upper Chattooga watershed is completely unfair, and the proposals that I have seen do not meet my interests. I have reviewed the Enviormental Assessment regarding the recreation management of the Chattooga River and I think it does not treat me fairly. Here is a list of issues that I found and agree with completely.

- 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?
- No alternative is acceptable because they all include boating bans on the upper Chattooga Cliffs reach and on tributaries – without any justification.
- 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 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 lacks a full range of alternatives
- 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.

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

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