From: crystal rippy
Reply To: crystal220221@yahoo.com
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga River Project Comments
Date: 08/18/2008 10:34 PM

U.S. Forest Service

Chattooga River Project

4931 Broad River Road

Columbia, SC 29212.

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

August 18, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest:

I am a paddler and a conservationist.

I have reviewed the Environmental Assessment (EA) regarding the recreational management of the Chattooga River and I disagree with your analysis and your proposal. The EA unfairly discriminates against a subset of river enthusiasts. Please consider the following concerns I have regarding this issue:

- The EA is not a user capacity analysis and does not reference one. The AW appeal decision required a user capacity analysis.
- The EA and preferred alternative are not equitable or protective of the river because they consider 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 450 CFS average daily flow trigger in the preferred alternative is a flawed measure that should be eliminated from any consideration. There is no way a paddler can know this number and will be an administrative burden for the agency. If a flow condition must be put in place, then as an alternative, consider allowing paddling on days when the instantaneous flow reaches 450 CFS or has the potential to reach 450 CFS due to rainfall.
- 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 my 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.

Sincerely,

Crystal Rippy

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