From: Erica Gould
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Subject: Chattooga River Project Comments
Date: 08/09/2008 10:31 PM

U.S. Forest Service
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.

August 9, 2008

Dear Sumter National Forest,

I am a concerned citizen living in San Francisco, CA and I partake in whitewater kayaking as a recreational activity.

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. Also, I believe that the proposal is counter to the purpose it is intended to achieve. The stated purpose of the proposal is to: "…ensure continued enjoyment of the upper Chattooga by a variety of outdoor recreationists; to maintain or improve biological and physical conditions in the Chattooga corridor; to ensure the Outstandingly Remarkable Values (ORVs) for the river are protected and enhanced (see Appendix A) and to protect water quality and free flow as required under the Wild and Scenic Rivers Act." Whitewater kayakers are strong advocates for the environment and are very careful to leave the outdoors as they find it so that others can enjoy it. The proposal prevents whitewater kayakers from the continued enjoyment of the river when they are the ones that are most concerned about protecting it and preserving it. 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?
- 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
Erica Gould
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San Francisco, CA 94122