From:	Bryan Mulvihill
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River Project Comments
Date:	07/17/2008 11:46 AM
Attachments:	Chattooga River - letter.docx

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

July 17, 2008
RE: Chattooga River Project Comments
Dear Sumter National Forest,
My name is Bryan Mulvihill and I am a whitewater kayaker. I currently live in White Plains, NY and I am a high school social worker. But more than that, I am someone who is concerned about the Chattooga River Project and the proposals being made.
I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposals. The majority of your alternatives discriminates against boaters and singles us out. All but Alternative # 8 speak of putting limitations on boaters and even that has restrictions of what sections can be boated—all without any justifications.
If one group is permitted to use the river, then all groups should be permitted to use the river without restrictions. The USFS has spent 13 years searching for a reason to limit paddling on the Chattooga and has found none. The Environmental Assessment and preferred alternative are not equitable because they consider boating to be the only management variable, while other larger more impactful activities are not seriously considered for limits. Alternative # 3 speaks of "potential impacts of boating". What potential impacts of boating? How about the potential impact of other groups? Foot traffic, injury to fish, fishing lines, and hooks left in the river. Alternative # 2 mentions maintaining a "boat-free" recreation experience as a way to preserve the rivers uniqueness. How does a boat take away from the uniqueness of the river any more than fishermen in the river or on the shore? Using the logic of Alternative # 2, both take away from the uniqueness of the river. Yet, boaters are singled out.
There is no reason that a more suitable alternative for boaters cannot be reached. The Environment Assessment lacks a full range of alternatives and offers no basis for the boating bans and limitations. Boaters should have more months available to them and should not be restricted by flow.
Thank you for considering these comments. Please consider doing 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 # 8, except on the entire Upper Chattooga River and its tributaries.
Sincerely,
Bryan Mulvihill
44 North Broadway, Apt. 4 BS, White Plains, NY 10603