From: Bill Herring
Sent By: arcreekfish@gmail.com
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: RE: Chattooga River Project Comments
Date: 07/17/2008 12:47 PM

Dear Sumter National Forest Managers,

I am a whitewater paddler and fisherman living in Arkansas, and I make frequent trips to the Chattooga R. to paddle and fish. I have been concerned about the lack of balance between recreational interests in the upper Chattooga R. area (so-called sections 00, 0, and 1). I believe that the desire of user groups to use public lands should be balanced against the impact of that use on the environment, wilderness, and the needs of other user groups. In the upper Chattooga R. area, the situation has historically not been one of balance. While the impacts of whitewater paddlers in the area would likely be relatively small (as they are on other rain-dependent stretches of creeks of similar difficulty), there has been an absolute ban on whitewater paddling there. It has been my hope that your recent analysis and EA would establish a much better balance among all recreational groups in the area.

But, after having reviewed the EA, I am disappointed. It seems that the analysis that was done was insufficient to establish a real picture of the impacts whitewater boating on the upper Chattooga. Was any type of real user capacity analysis performed, of the kind that are used by wilderness managers to balance recreational activities around the nation (for example in the recent revision of NPS policy for the Colorado R. in the Grand Canyon)? If not, the basis for this decision does not appear to be based on actual data. Also, all major user groups should be considered in any analysis of capacity and impacts in the watershed, but it appears that whitewater paddlers are the only users considered and subsequently severely limited by your proposal. It is still unclear how much use by different recreation user groups actually occurs or would occur if there were no restrictions at all, or if the impacts of such unrestricted use would be unacceptable. The wilderness qualities of our Wild and Scenic Rivers such as Chattooga should be protected by wilderness managers, but steps to limit access of very recreationists who enjoy the protected wilderness should be based on unbiased and careful analysis and real data. I do not see that this is evident in your Environmental Assessment, and I oppose the current proposal. I would support a plan based upon an actual study of recreational user groups likely usage and impacts, and one that is balanced and unbiased between those groups.

Thank you for your consideration.

Sincerely,
Bill Herring
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