From: Robin Pope
To: comments-southern-francismarion-sumter@fs.fed.us; robinpope3@hotmail.com
Subject: Comments on Chattooga Management Plan
Date: 08/12/2008 09:01 AM

U.S. Forest Service
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.
comments-southern-francismarion-sumter@fs.fed.us
RE: Chattooga River Project Comments
August 12, 2008

Dear Sumter National Forest,

The Chattooga River is roughly an hour from my home, and it is one of my favorite places for hiking and boating. I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposal. The management plan has several significant flaws.

a) The management plan does not address the harm caused to the riparian environment by anglers walking on the riverbed and shore. It also does not address the potential harm caused by non-native species introduced for anglers.
b) The preferred alternative appears to assume, with no justification, that boaters will leave more trash and cause more damage than current users of the river corridor. However, it is clear that current users leave significant amounts of trash and debris, and cause noticeable erosion. Evaluation of sections that currently allow boating demonstrates that boaters generally follow a "leave no trace" philosophy which clearly is not used by other groups. 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 uses that demonstrably cause harm to the river corridor are not seriously considered for limits.
c) Human powered boating is a wilderness compliant activity. There is no data supporting limits on boating on any section the Chattooga River. There is no data that suggests significant or unique negative interactions among boaters and other user groups. The preferred alternative therefore appears arbitrary and capricious. The preferred alternative does not appear

to be based on data.

d) The USFS hired qualified consultants and then ignored their input. In particular, the 450 CFS average daily flow trigger in the preferred alternative is a flawed measure that should be eliminated from any considerations. There is currently no way for the public to know this number. Calculating and publishing it will be an administrative burden for the agency.

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. The Chattooga River's designation as a Wild and Scenic River gives surrounding property owners significant benefits, but those benefits must be counter-balanced by the need to allow public access to the public.

I would 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.

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.

Very Truly Yours;

Robin Pope
106 Johnny Knob Lane
Sylva, NC 28779

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