From:	Zina Merkin
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River - comments on EA
Date:	08/17/2008 10:15 PM

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

August 17, 2008

RE: Chattooga River Project Comments

To Whom it may concern,

I am a paddling enthusiast who lives in Lexington, KY. I am a registered Landscape Architect and work for the University of Kentucky doing land use planning research. I am an intermediate paddler, and may never wish to boat the sections of river under discussion, but it is important to me that such studies, and such decisions, are made properly. Managing for multiple uses is never easy, which is why it is imperative that Environmental Assessments are done according to valid protocol and with transparency and good public input.

I have briefly reviewed the Environmental Assessment regarding the recreational management of the Chattooga River, and have several concerns about both its method and conclusions.

* The EA does not contain a user capacity analysis and does not reference one. The AW appeal decision required a user capacity analysis. Where is it?
* It does not contain a full range of alternatives 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 treat boating as the only management variable, while other uses, which arguably have larger impacts, are not seriously considered for limits.
* The assessment does not spell out the basis for the boating bans and limits, or how they were determined.
* The USFS hired qualified consultants and apparently ignored their input
* The 450 CFS average daily flow trigger in the preferred alternative is a flawed measure that will be an administrative burden for the agency. It should be eliminated.
* The public should have the right to float on public Wild and Scenic Rivers regardless of who owns the land along the river.

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.

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,

Zina R. Merkin
120 Victory Ave.
Lexington, KY 40502