From: Charles Wier
Reply To: cwier60@yahoo.com
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Pre-decisional Environmental Assessment on Recreation Uses on the Upper Chattooga Comments
Date: 08/18/2008 11:36 PM

Jerome Thomas, Sumter National Forest supervisor
U.S. Forest Service
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.

18 August 2008

RE: Pre-decisional Environmental Assessment on Recreation Uses on the Upper Chattooga Comments

Dear Jerome,

I am a 48-year-old lifelong fisherman who has begun whitewater kayaking in the past two years. Therefore, I consider myself capable of making an unbiased objective decision regarding the boating ban that has been in place for over 30 years and the actions that should now be taken to preserve the environment of the Wild and Scenic upper Chattooga river area. I'd like to begin by stating that I vehemently oppose Environmental Assessment alternative 4 regarding the recreational management of the Chattooga River, which effectively maintains the boating ban for all intents and purposes and does nothing to manage environmental impacts in the area from other user groups.

After having attended several of the workshops last year to provide input on the evaluation and to propose alternatives for the management of the Upper Chattooga, I was very disappointed by the bias shown and the closed-minded approach of the TU-backed fishing community. Obviously, boaters have and potentially continue to be the only low-impact users to be discriminated against, yet they seem to be the ones who are most interested in the equitable management of the area to preserve it for all low-impact users. I can objectively say that the objective of the opposing fishing community is not to preserve this beautiful resource for uses approved by the Wilderness Act and Wild and Scenic Rivers Act, but to maintain "remoteness and solitude in the southeast" for a select selfish few. There has never been a user capacity analysis to evaluate all low-impact uses in the area, but only measures in place to monitor boating, with a biased objective to
maintain an unlawful ban. The only way to gain an understanding of the potential conflicts that are purported to occur if boating is allowed is to create a period of evaluation during which all uses approved by the Wilderness Act and Wild and Scenic Rivers Act are allowed and monitored for levels of use and conflict.

Besides the personal costs and time of myself and all others who have attempted to work within the whimsical review and assessment process, the taxpayers of this country have spent millions of dollars on the same process. Millions of dollars for studies and a process mandated by the Forest Service's own reviewing officer in rejecting Sumter National Forest's previously flawed Management Plan have been wasted. The reviewing officer stated that a User Capacity Analysis be conducted before banning or regulating any qualified user group, in which it was stated boating was a qualified user group. Also stated was the ban or regulation of a particular user group must be founded in findings of said user capacity analysis.

Unfortunately, your office has wasted countless taxpayer dollars and time with the release of the recent EA document and your preferred alternative. The only factor that Alternative 4 really addresses is continuing to maintain the 30-year unlawful boating ban by placing capricious "mean daily flow level" and calendar limits that effectively limit boatable opportunities to one or two days per year. The saddest factor is that absolutely no consideration has been given to managing the use of resources by ALL user groups. Only by implementing a user capacity analysis and managing the use of this beautiful resource by all users can all aspects of the "Outstanding Remarkable Values" of Wild and Scenic Rivers be protected on the entire river, not just in some areas and for one particular selfish user group. It is very clear from the feedback I received from the workshops and the comments made during this review period from the anti-boating users, backed
primarily by Trout Unlimited, that their interest is not in preserving the "Outstanding Remarkable Values" of this Wild and Scenic River, but only as those values relate to a selfish few.

Thank you for considering these comments. The Forest Service not only needs to conduct a proper impact study of boating in the Upper Chattooga, it must also conduct similar studies on all other user groups. Boating is viewed as the only variable in all management plan alternatives, when in fact, there are larger user groups with significantly more environmental impact that are not considered for limits and/or restrictions. It's only with quality impact studies that the Forest Service may equitably reduce the impact of all user groups and therefore, protect and restore its natural wonders. 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.

Sincerely
Charles Wier
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