From:	Jeff Lankford
To:	comments-southern-francismarion-sumter@fs.fed.us
cc:	akimbell@fs.fed.us
Subject:	Upper Chattooga River management proposal - comments
Date:	08/18/2008 11:51 PM

Dear Sirs,

Please consider my following comments regarding the Upper Chattooga River proposed management plan and environmental assessment.

I do not agree with the current proposal to follow alternative #4 from the recent EA. What is needed is a management plan that is equitable to all user groups deemed appropriate for access to all sections of the designated Wild and Scenic Chattooga River.

Non-motorized whitewater boating is a recognized use that is consistent with the goals and intentions of Congress when it has applied the designation of Wild and Scenic to any river, including the Chattooga. The current proposed alternative #4 is effectively a ban on boating access to the upper sections of the Chattooga, in contradiction to the intentions of Congress.

Fair and equitable access to this public natural resource must be granted to all appropriate user groups. A limitation of access for one user group, while all other appropriate user activites go unregulated and unlimited, is quite simply unjust.

Alternative #4, while appearing to be a management plan which will allow access to the boating user group, will effectively limit the use by this group to nearly zero. When the details of the proposal are considered, such as water level limits stated by the plan, and the administrative procedures intended by the local NFS Sumter office to announce permissible days only based on predicted rainfall, it is clear that the probability that any boating can ever take place on these river sections is extremely low. It is likely that only one or two "boatable" days per year will be designated by the Forest Service. Considering that the likelihood these days will fall on a weekend is even lower, the alternative constitutes an effective ban on this boating user group, while no restrictions of any kind are to be placed on the other permissible user groups under the alternative.

The necessity to create artifical limitations to regulate one user group in order to prevent interaction between conflicting user groups does not exist. The

conditions (water level) appropriate for boating are not ideal for the trout fishing user group, and vice versa. I sincerely believe that interactions between these two groups would be minimized through self-regulation caused by the mutually exclusive desirable conditions for each activity. Crafting unreasonable limits to isolate the two user groups is unecessary.

One of the primary arguments against boating appears to be due to the impacts boating causes to an area. This is simply not a fair assessment or comparison between user groups. Boating a stream is a recognized low-impact activity, whereas hiking and fishing have caused considerably more impact to the Chattooga river due to unofficial trails, bank erosion, and litter. The private boating community is comprised of respectful stewards of the outdoors. As an example, I an unaware of organized schedule cleanup activities orgainized by other user groups, whereas the boating community does this routinely - usually to collect the litter dispersed by the other user groups in question.

Neither resource impact nor user group conflicts are appropriate reasons to justify a ban on boating the Upper Chattooga.

I strongly recommend the following modifications to the proposed management plan:

1. Lower the flow designation for "boatable days" to 340cfs at the Burrels Ford guage. The existing limit of 450cfs has no basis in the data collected by the user capacity analysis. The 450cfs limit is artifically high and is the primary cause of alternative 4 being an effective ban against the boating user group.

2. Do not implement a prediction system to designate boatable days. Do not require pre-registration for the boating user group when no other user group is required to obtain such pre-registration permits.

3. Designate fair and equitable user capacities for all permitted user groups.

4. Require self-registration permitting for all user groups along all sections of the Chattooga Wild and Scenic corridor in order to monitor use and collect further data needed for adaptive management whenever user capacities are exceeded.

5. Extend the acceptable season for "boatable days" to year round, based upon the flow limit stated at #1 above.

6. Allow the boating user group to access all sections of the Upper Chattooga River below Grimshawes Bridge.

7. Do not consider adding commercial rafting as an appropriate user group activity.

Thank You for your consideration of the above comments. Please make a fair, just, and moral final determination.

Best Regards,

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