From:	H. Kyle Anderson
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River Project comments
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Attachments:	Chattooga river comments 8 18 08.doc

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

August 18, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

I am Kyle Anderson from Anderson SC and have been visiting and using the Chattooga River area as a hiker, camper, fisherman, paddler and biker since 1976. My first memories are square dancing in the Oconee State Park barn as a college student. My two sons, Ian and Dylan have been coming to the area with me and my wife for over a decade now.

I have been extremely disappointed to see the vast overuse, lack of workable management plan and the degradation of the environment for many years now. Most recently when my family hiked in from Burrell's Ford to explore a possible backpacking trip for the Boy Scouts, the amount of trash including beer cans, bottles, toilet paper, fire pits and other debris and condition of the trails and camping area's were terrible. We lost the trail several times due to the numerous fishing and camping side trails. The few sign-in points for non-boating users were in such bad shape it was clear they had not been usable for years. Most disturbing, I was cautioned by several locals that camping at the river near road access could result in my family being subjected to loud drunken parties and even gunfire.

I have also been involved in the management/user/paddler access issues for over a decade and have reviewed the Environmental Assessment regarding

the recreational management of the Chattooga River. I disagree with your analysis and your proposal.

It is clear to me that your past policies have failed and that to suggest that keeping paddlers out of the area will maintain the current tranquility and beauty of the area is absurd. I don't consider trash, overuse, erosion, public drunkenness and possible gunfire acceptable.

It is very clear that you continue to fail to consider that public land should be available to the public and not just non-boaters and that there has to be some control over use by all users. I hate to consider what the area will look like in 10 years if you continue unrestricted access by the current allowed users as in your most recent proposal.

Please consider the following concerns I have regarding these issues:

- The USFS has spent thirteen years searching for a reason to limit paddling on the Chattooga and has found *none*. It is time to open the river to boating.

- The EA is not a user capacity analysis and does not reference one. The American Whitewater appeal decision required a user capacity analysis. Where is it? My visits to the area over the past decade make it clear that there were no real attempts to measure current use other than boaters.

- The EA and preferred alternative are not equitable or protective of the river because they considers boating to be the only management variable, while other larger more impactful uses are not seriously considered for limits. How much more abuse by the current unrestricted and unlimited users can the area withstand?

- The USFS preferred alternative includes a total ban on 2/3 of the upper river, a ban on tributary boating, and allows only 0-6 days of limited boating on the remaining reach – while allowing all other wilderness conforming existing uses in unlimited numbers. This is not only inequitable but the area cannot withstand the current abuse much longer!

- The EA offers no basis for the boating bans and limits

- The 450 CFS average daily flow trigger in the preferred alternative is a flawed measure that should be eliminated from any considerations. There is

no way a paddler can know this number and will be an expensive impossible administrative burden for the agency.

- 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.

- 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.

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

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