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To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River Project Comments
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Attachments:	CCC Chattooga comments_LA rev.pdf

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August 14, 2008

TO: U.S. Forest Service
Chattooga River Project

SUBJECT: Chattooga River Project Comments

The Carolina Canoe Club, Inc. (CCC) is a southeastern paddling organization centered in the Carolinas with over 1100 members. Most of these members are whitewater canoeists and kayakers who would be directly influenced by decisions managing the uses of the Chattooga River headwaters. The CCC strives to carry out the objectives set forth by its founders, including teaching and upholding the highest standards of river safety, skill, and environmental ethics.

The CCC Board of Directors, on behalf of the Club's membership, has reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. We disagree with the Forest Service's assessment of the issues and the proposed recommendation for management actions. Please consider the following concerns we have regarding this issue:

• The EA arbitrarily singles out "fishing" as a best use of these waters to be supported, ignoring other best uses including secondary and primary recreation (for the waterbody segment in North Carolina) which includes boating uses. This 'weighting'

of one use, and
subsequently one user-group, is unfounded particularly in light of the fact that all of these
uses were considered to contribute to the value of naming this segment as a National Wild
and Scenic River segment which also subsequently contributed to its designation as a North
Carolina Outstanding Resource Water.

• No logical or empirical case has been made that the whitewater boating community would
be anything but the least consumptive user group in this area yet it is this, and only this,
group of users that have been singled out for restriction, implying at least some degree of
caprice in the decisions reached and alternative proposed.. The Carolina Canoe Club firmly
believes that this group of users is more than willing to share and help protect the resources
being managed and would not think about excluding others' use of the area. We only ask
that whitewater boaters receive equal treatment and access to the resource.

• We believe that the proposed 450 cfs daily average flow boating target presents an illogical
and unenforceable measurement target that could only be assessed after the theoretical
period for boating, such that by the time the measure could be made, actual flow may be
greater or less than the target, thus circumventing by default the intent of the target. Under
a completely open scenario, the EA estimated only 120 days per year of 'boatable' flow: only
1/3 of the year when any potential interaction of this user group with others would occur.
Since significantly higher flow would decrease further the interaction of fishermen and
boaters, we believe that, at least on a trial and modifiable basis, such an open scenario
would prove to be a positive step forward toward equitable use by all.

Considering the above, the Carolina Canoe Club, Inc. recommends adoption of management
option # 8 as presented by the EA in which no predisposed limitation on boating the Chattooga
Headwaters is imposed. We believe this scenario begins future adaptive management actions
with the most complete and equitable allowance for all stakeholders yet still does not risk
irreparable harm to the resource or its use. Should this scenario not prove effective, evolution of
future strategies will then have empirical evidence as foundation. We agree with the USFS and
other user groups that this beautiful land and water must be preserved for enjoyment by all and
we would gladly commit to doing our part to collaboratively monitor and iteratively modify uses
and impacts and to guide our user-group in best-practices to minimize degradation of the
resource or its enjoyment by others.

We believe this approach would represent a "win" for USFS, all user groups and the resource
itself. Together, building a positive, proactive management team of stakeholders we can
shepherd the resource into the future.
Thank you for considering these comments. We look forward to a collaborative and positive
partnership between the Carolina Canoe Club, its members and the USFS.

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