From: Kyle McCutchen
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga River Project Comments
Date: 07/16/2008 05:21 PM

U.S. Forest Service

Chattooga River Project

4931 Broad River Road

Columbia, SC 29212.

7/15/08

Dear Sumter National Forest,

I am a coauthor of the guidebook Whitewater of the Southern Rockies, a guide to rivers in Colorado, New Mexico, Arizona, Utah, and Wyoming. I have been paddling since I was 11 years old, and have seen the positive affects of good river management that allows use by many, and bad management that unfairly denies access to select river users.

I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposal. Both treat me and my community of river enthusiasts unfairly and your proposal would not meet my interests. Please consider the following concerns I have regarding this issue:

- The proposed alternative will negatively impact protections granted under the Wilderness Act and Wild and Scenic Rivers Act on the Chattooga and other rivers nationwide.
- 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 AW appeal decision required a user capacity analysis. Where is it?

- No alternative is acceptable because they all include boating bans on the upper Chattooga Cliffs reach and on tributaries – without any justification.
- The EA offers no basis for the boating bans and limits
- The USFS hired qualified consultants and then ignored their input
- 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 administrative burden for the agency.
- The public should have the right to float on public Wild and Scenic Rivers regardless of who owns the land along the river.

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

Kyle McCutchen

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