From: BJ Haraughty
Reply To: bjharaughty@yahoo.com
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: EA on Chattooga River
Date: 07/16/2008 08:33 PM

U.S. Forest Service
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.

July 16th, 2008

Dear Sumter National Forest,

My name is Brandon Haraughty, I am an avid kayaker. It is disturbing to me that the Forest Service is planning to close the Chattooga River to boaters. This is especially disturbing because this river is only runnable a week or more of the year or during a big rain event. I live in Arizona and I am an employee of the government also. I understand the reasons for closing areas off to public access. Sometimes areas just get beat up from overuse which is an excellent reason to close an area off and allow it to heal or not close it off from public use but alter the area to minimize the impact of public use. I fully understand the reasons for doing so because I have done the work to close certain areas off from public use. The Chattooga River does not seem like it should be one of those areas. Why close a river to boater use which they could only use for a few months of the year? Access points should be minimized and improved upon to limit resource
damage for both fishermen and boaters. Trails should be minimized and reinforced but please do not close off access for the boating community.
I have looked over 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 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.
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 equitable and not acceptable!
The EA offers no basis for the boating bans and limits
The EA lacks a full range of alternatives
The EA is no better or different than the last one, is at least a year late and has wasted millions in tax payer money
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.
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,
Brandon Haraughty
4890 Dandy Dude Dr.
Lake Montezuma, AZ 86342

"When the power of love overcomes the love of power the world will know peace." -Jimi Hendrix