From:	Norman Sims
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River Project Comments
Date:	07/16/2008 02:20 PM

U.S. Forest Service

Chattooga River Project

4931 Broad River Road

Columbia, SC 29212.

comments-southern-francismarion-sumter@fs.fed.us

July 16, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

I am a whitewater boater and environmentalist from western Massachusetts who has visited the Chattooga River on several occasions as a paddler and a tourist over the past 25 years. I have been boating for more than 30 years. My environmental background includes 12 years on the board of directors of the Appalachian Mountain Club, which has 95,000 members from Maine to Georgia and North Carolina. I have helped negotiate river relicensing permits on power company dams on the Deerfield River and on Corps of Engineers dams on other rivers in New England.

I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposal. Your assessment unfairly changes long-standing practices in the management of this river system, and fails to take into consideration the economic and environmental benefits that boaters have for the region.

- The proposed alternative ignores protections granted under the Wilderness Act and Wild and Scenic Rivers Act on the Chattooga and other rivers nationwide.
- The USFS has spent 13 years of prejudicial searching in an effort to limit paddling on the Chattooga. This is inappropriate behavior for a federal agency.
- Your environmental assessment ignores the requirement for a user capacity study and is therefore deficient.
- 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 preferred alternative allows all other wilderness conforming existing uses in unlimited numbers, which is further evidence of your prejudicial approach to boating.
- The EA offers no basis for the boating bans or limits. Scientific evidence from FERC relicensing studies show no negative impacts from boating.
- 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 fully allows boating on the entire Chattooga River below Grimshawes Bridge, allows paddling on tributaries, includes encounter standards based on a real user capacity analysis, will *equitably* limit *total* use only when encounter standards are consistently exceeded, and 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. This is part of federal law in the rest of the nation. The rivers belong to us, not to the landowners.
- All aspects of the "Outstanding Remarkable Values" of Wild and Scenic Rivers should be protected on the entire river, not just in some areas.
- Boaters bring needed economic assistance to this region, and they

create an environmental army prepared to preserve the river from environmental threats. It was through the work of boaters nationwide that the Wild and Scenic Rivers Act was passed, and has been protected.

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

Norman Sims

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