From: Adam Miles
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga River Project Comments
Date: 07/27/2008 01:53 AM

7/27/08

Dear Sumter National Forest,

My name is Adam Miles and I am a senior in Mechanical Engineering at Clemson University. I grew up in Greenville, SC and have always been an outdoor enthusiast. I have been paddling since I was in middle school, both touring boats and whitewater. My first experience whitewater kayaking was on the Chattooga River and it is still one of my favorite places to paddle. In addition to kayaking I also spend a fair amount of time hiking, mountain biking, and fishing. Because of this I see this issue from the side of several different user groups.

After reading 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 paddlers unfairly and your proposal would not meet my interests. I have always supported the forest service as the majority of my hobbies take me to land they manage, however I do not agree with, nor do I see the logic in this decision. 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.
- No alternative is acceptable because they all include boating bans on the upper Chattooga Cliffs reach and on tributaries – without any justification.
- 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 is no better or different than the last one, is at least a year late and has wasted millions in tax payer money

- 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 allowing me to voice my opinion,
Sincerely
Adam Miles
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