From:	Wes
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River Project Comments
Date:	07/30/2008 09:43 AM

U.S. Forest Service
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.
comments-southern-francismarion-sumter@fs.fed.us

July 29, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,
I have been a whitewater enthusiast utilizing the Chattooga Wild and Scenic River since 1977. I have also worked as a guide for on Section III/IV (1986-1988) and have spent many pleasurable hours recreating on the Chattooga **both as a fisherman and as a whitewater boater**. I have the utmost love and respect for this river and believe that above all, we must work to preserve its natural beauty, while not unfairly limiting or prohibiting access to those who wish to recreate on this river.
I have read with great interest the Environmental Assessment regarding the recreational management of the Chattooga River . I absolutely disagree with your analysis and your proposal. Both treat whitewater enthusiasts unfairly. Please consider the following concerns I have regarding this issue:

It is my understanding that the USFS has spent thirteen years searching for a reason to limit whitewater recreation on the headwaters sections of Chattooga and has found ***none***. *It is time to stop this nonsense and open the headwaters to whitewater enthusiasts!*

The EA is not a user capacity analysis and does not reference one. The American Whitewater appeal decision required a user capacity

analysis. Where is it?

No currently proposed alternative is acceptable to whitewater enthusiasts because they all include boating bans on the upper Chattooga Cliffs reach and on tributaries – without any *legitimate* justification.

The EA and preferred alternative are not equitable or protective of the river because they consider whitewater boating to be the only management variable, while other uses which may indeed inflict a much larger impact are not seriously considered for limits. Whitewater boating impacts the river corridor less than fisherman or hikers! Whitewater boaters will only leave the river at access points, and at a few rapids along the corridor to scout. Short established trails could easily be constructed along these rapids if necessary. In contract, fisherman will walk primarily off trails to access fishing pools! Fishermen also harvest wildlife (fish) and the streams must be stocked at considerable expense to accommodate them. Whitewater enthusiasts only require an access trail and parking at a few access points that the fishermen could also utilize.

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 (provided the ridiculous speculative water flow conditions are met) while allowing all other wilderness conforming existing uses in unlimited numbers. This is not nearly 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 whitewater enthusiast can know this number and it is doubtful that even the USFS will be able to predict this flow level with any reliability! Furthermore, it will be an administrative burden for the agency. It is so impractical to establish this flow parameter as a prerequisite for recreational boating, that the only possible reason it has been proposed is to continue to ban whitewater recreation in the headwaters while appearing to allow boating in certain rare circumstances!

The argument that there could be user conflict is also ludicrous. Optimal river flows for fishing or swimming in the river would not be the same as optimal flows that would be conducive to whitewater boating. It makes absolutely no sense to limit access to whitewater enthusiasts based on this argument! Fisherman and whitewater enthusiasts (sometimes in large numbers) seem to peacefully co-recreate on rivers all over the world. What makes the Chattooga such a river that this is peaceful interaction is not possible? Is it because one group simply does not want the USFS to allow access to another group based on pure speculation of conflict? What evidence is there to support that there would be any such conflict at all?

The fact of the matter is that there actually would be very few days during the year that the flows would be optimal for whitewater boating on the upper sections of the Chattooga. Most of these days would be after a heavy rain, and in my experience as a fisherman, poor conditions for fishing in these waters. Even if there were a few fishermen present, boaters tend to travel in groups, and there would be only a few short periods of time that they would actually be sharing the same pool of water.

Whitewater enthusiasts 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.

Sincerely,

J. Wesley Prince
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