From: David Herman
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga River Project Comments
Date: 08/01/2008 10:58 AM

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

August 1, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

I currently live in Spartanburg, South Carolina, and I have been a resident of the upstate of South Carolina for about 6 years. I have been actively involved in white water kayaking for that entire time, and I have always seen the upper Chattooga as an area with an enormous potential for boating.

I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River, and I disagree with your analysis and your proposal. Both treat paddlers unfairly and your proposal would not meet my interests. The current proposal has an extreme bias towards other user groups who are allowed unlimited access while unfairly discriminating against paddlers.

If you look at similar rivers in the area you will see that there are almost no conflicts between boaters and other user groups. A good example is Overflow Creek which is a similar stream. In the 10 to 15 times I have been on that stream I have never encountered a fisherman, and I have encountered hikers only once and they were excited to see us. If the upper Chattooga were opened to boating I believe you would see a similar result because the best boating days are typically during rain and other user groups aren't out nearly as much in those conditions.

Much of the pressure to limit or ban boating on the upper Chattooga seems to be coming from the trout fishing community, but there are no limits on trout fishing or any other user group in the EA even though fishing is a much higher impact activity. Trout fishing depends on stocking rivers with a non native species of fish, and it also encourages fisherman to create trails to access the river. Boating

typically requires an access point at the beginning and end of the run, and has almost no other impact.

The EA that was conducted offers no basis for a boating ban, and it also lacks an acceptable alternative for boaters. All of the current alternatives include boating bans on the upper Chattooga Cliffs reach and on tributaries, but offer no justification for those bans. 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.

Another problem with the current alternative is that there is no realistic way to predict flows over 450cfs until after they have occurred. The gage for this stretch of river is miles downstream, and by the time a sufficient gage reading has occurred the water level may have already dropped upstream. This means that the current plan is just a covert way of continuing the boating ban. If other rivers are looked at you will see that boaters will only paddle a river if and when there is adequate flow, and we do not need the Forest Service to tell us when that is. This would also be an administrative burden that the Forest Service does not need to take on since boaters are perfectly capable of determining proper flows themselves.

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 American Whitewater appeal decision required a user capacity analysis. Where is it? 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!

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

L. David Herman Jr.
192 Clifton Ave

Spartanburg, SC 29302