From: Tom Bishop
Reply To: tpb_mail@yahoo.com
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Comments: Chattooga River Project
Date: 08/05/2008 08:01 AM

Dear Sumter National Forest,

I am a whitewater kayak paddler living in the northeast, which is home to several Wild and Scenic Rivers. The Environmental Assessment (EA) for recreational management of the Chattooga River in South Carolina may impact the use of rivers in the northeast, and I am opposed to the existing EA. It is unacceptable for several reasons:

* The EA is not a user capacity analysis and does not reference one. Without this analysis, how does Forest Service assume the river's capacity?
* The USFS has spent thirteen years searching for a reason to limit paddling on the Chattooga and has found none.
* Every alternative includes boating bans on the upper Chattooga Cliffs reach and on tributaries – without any justification.
* The EA and preferred alternative are not equitable to all types of recreational users, allowing unlimited hiking, fishing and camping. These uses are more impactful than boating.
* 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.
* 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.
* The public should have the right to float on public Wild and Scenic Rivers regardless of who owns the land along the river.

The Chattooga certainly offers Outstanding remarkable values, and Forest Service has chosen to limit the experience to recreational users that will cause greater environmental impact than paddlers.

The plan for paddling on the Chattooga should 1) fully allow boating on the entire Chattooga River below Grimshawes Bridge, 2) allow paddling on tributaries, 3) include standards based on a real user capacity analysis, 4) equitably limit total use only when encounter standards are consistently exceeded, and 5) do so using all available indirect measures first.

This EA is no better or different than the last one. Please conduct a user capacity analysis and immediately allow boating in the same numbers, places, and seasons that you allow existing users.

Sincerely,

Tom Bishop
150 Jenness Street
Lynn, MA 01904
781-888-2050
[INSERT name and address]