From: Nicholas Gottlieb
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga Headwaters
Date: 08/08/2008 12:58 AM

August 8th, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

I am a paddler in the northeast US who travels a fair amount. I've paddled the lower sections of the Chattooga (that are legally accessible), as well as a number of other rivers in the area. The Headwaters of the Chattooga seems like an incredible resource, and I sincerely hope the Forest Service decides to lift the ban.

Additionally, I'm a student at Dartmouth College and a member of its Ledyard Canoe Club. We (the club) take a trip with some thirty students to the area every year in the Spring, and the Headwaters of the Chattooga would be a great new river for students on that trip.

I have reviewed 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 river enthusiasts unfairly and your proposal would not meet my interests. Please consider the following concerns I have regarding this issue:

* 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 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 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!
* 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 considering these comments,

Sincerely,

Nicholas Gottlieb
Ledyard Canoe Club
Dartmouth College