From: michael spanjer
Reply To: michaelspanjer@yahoo.com
To: comments-southern-francismarion-sumter@fs.fed.us
Cc: akimbell@fs.fed.us
Subject: Chattooga Headwaters - End the boating ban!
Date: 07/30/2008 08:19 AM

U.S. Forest Service
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.

comments-southern- francismarion- sumter@fs. fed.us

7/30/08

RE: Chattooga River Project Comments

Dear Sumter National Forest,

I'm a boater, a hiker, a photographer, an environmentalist, and a lover of nature and of our country. I live in Southeast KY, a few hours drive from the Chattooga area. I do not yet have the boating skill to run the headwaters reaches, and I may never do so, but learning of the boating ban that has stoof for so long in these waters troubles me deeply.

I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposal. Banning boating without a good reason is just plain wrong. Please stop wasting taxpayer money on "studies" that are not about the issue in question here, and please restore these river reaches to the access they should have. Here are a few of the big points that bother me the most:

• The USFS has spent thirteen years searching for a reason to limit paddling on the Chattooga and has found none. It is long past the time to open the river to boating. This is a free country, no a totalitarian state where I have to get permission from the governement for every activaty. Paddling these rivers is my right as long as no harm is being done to anyone or anything. It is **fundamentally wrong and un-American** to impose a boating ban without any grounds.

• 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 EA is not a user capacity analysis and does not reference one. The AW appeal decision required a user capacity analysis. Where is it?
• 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!
• 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 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 considering these comments,

Sincerely,

Michael Spanjer

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