From: Paul_C_Davidson@msn.com
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga River Project
Date: 08/12/2008 10:40 PM

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

8/12/08
RE: Chattooga River Project Comments
Dear Sumter National Forest:
I am a physician in Atlanta. I have been paddling canoes and kayaks since 1944. I have paddled in USA, Costa Rico, Honduras, Switzerland, Germany, and Canada. I have authored multiple books and articles on whitewater paddling. I have competed in wildwater and salom racing. Two on my sons have been nationally ranking kayakers. I am now the oldest person to open canoe the Grand Canyon. I have held offices in American Canoe Association, American White Water Association, and West Virginia White Water Association. I have paddled the Chattooga over 100 times since 1978.
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.
- The EA is not a user capacity analysis and does not reference one. The AW appeal decision required a user capacity analysis.
- 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 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 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
Paul C Davidson