From: scooter_girl@bellsouth.net
To: comments-southern-francismarion-sumter@fs.fed.us
Subject:
Date: 08/12/2008 11:12 AM

U.S. Forest Service

Chattooga River Project

4931 Broad River Road

Columbia, SC 29212.

August 12, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

My name is Charly, and I live in Atlanta, Georgia. I have been paddling for approx. 3 years and have been an avid hiker for 10 or so.

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 section was closed off for arbitrary reasons, and the USFS has no legal justification for doing this. This river is covered under the Wild Scenic River Act. The alternatives that you have constructed are unacceptable, as they all include boating bans on the upper Chattooga Cliffs reach and on tributaries, without any justification. The WSRA explicitly states that unmotorized boats are acceptable and does NOT contain any language that could be interpreted to "limit/restrict" unmotorized boats and the dates they can boat. The EA and preferred alternative are not equitable or protective of the river because they consider boating to be the only management variable, while other larger **more impactful** uses are not seriously considered for limits. But if you see a reason to limit us, then supply a quantifiable basis, and if you can not do this, then you must be able to see that this discrimination is superfluous and your reasons hold no merit.. The USFS hired qualified consultants

and ignored their input, why is this?

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.

All aspects of the "Outstanding Remarkable Values" of Wild and Scenic Rivers should be protected on the entire river, not just in some areas.

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,

Most Cordially,

Charly Albin