From: Jeremy.Thomas@CH2M.com
To: comments-southern-francismarion-sumter@fs.fed.us
Cc: kevin@americanwhitewater.org
Subject: Chattooga River Project Comments
Date: 07/17/2008 01:10 PM

U.S. Forest Service
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.
comments-southern-francismarion-sumter@fs.fed.us

07/17/2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

My name is Jeremy Thomas, I am an environmental professional and an avid whitewater kayaker living in California. I spend my vacation time every year traveling around the country to paddle with friends and family, and have been planning on visiting the Chattooga River region to kayak there in 2009 or 2010.

I work for CH2M HILL and specialize in environmental permitting for water resources projects. I have been the primary author and scientist for several HCP and EIS/EIR documents in California and Colorado, and worked in partnership with the USFS and other federal agencies (primarily BLM, NMFS, and USFWS) during that time.

I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposal. The effective ban on recreational boating on the Chattooga is unsupported, and antithetical to the spirit and intent of the Wilderness Act and Wild and Scenic Rivers Act on the Chattooga, which supports low-impact recreation. The public should have the right to float on public Wild and Scenic Rivers regardless of who owns the land along the river. In addition, there is no analysis on the potential impacts of boating on the Chattooga, without this analysis, there is no basis for the limitations on boating included in the EA.

These facts are based on some fundamental flaws within the EA document:

- The EA offers no basis for the boating bans and limits.
- The EA lacks a full range of alternatives.
- 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 potentially larger and more environmentally damaging uses are not seriously considered for limits.

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.

I support American Whitewater's stance on this issue, and request that you please consider 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.

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.

Sincerely,

Jeremy Thomas
955 Piedmont Dr
Sacramento, CA 95822

Jeremy Thomas
Water Resources Specialist
Ecosystem Planning and Restoration
CH2M HILL
2485 Natomas Park Dr Suite 600
Sacramento, CA 95833
916-563-2519
jeremy.thomas@ch2m.com