From:	Stacy Karacostas
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River EA
Date:	07/18/2008 07:07 PM

To Whom it May Concern,
As a past Forest Service employee with a degree in Recreation Resource Management, as well as a long-time paddler, I'm appalled that the most recent Environmental Assessment effectively banning boating on the Upper Chattooga has been produced without the court mandated user capacity analysis.

I have spent the better part of the last 25 years in the backcountry and on rivers, six of those as a backcountry ranger and river ranger, and 5 as a raft guide. As a former Atlanta resident, I have also run sections and 3 and 4 of the Chattooga multiple times.

I can tell you from firsthand experience that fishermen and hikers have far more impact on a river than kayakers and experienced rafters. I have spent many an hour as a ranger cleaning up, restoring and/or blocking off dispersed campsites that had become an eyesore. I have rarely needed to do any cleanup after kayakers.

In large part because most of a boater's time is spent on the water where no impact can be detected, and they move through an area quickly rather than staying in one spot for long periods of time. Paddlers also tend to leave very little behind because they only come into an area with the gear they need. This is in direct contrast to fisherman in particular who regularly leave lures, fishing line (hooks get caught on logs and lines break, leaving behind monofilament that can be dangerous to birds in particular), packaging from a variety of fishing accessories, and more, plus food and beverage remnants that are the result of spending many hours in one area.

On top of that, the number of kayakers with the skill to paddle the sections in question on the upper Chattooga are very small—considerably smaller than the numbers of hikers and fisherman currently using the area. Therefore their impact would most likely be virtually unnoticeable.

It is illegal, unethical and immoral to use the EA as a tool for political gain instead of treating it as an unbiased scientific document complete with user capacity studies. It is also completely out of line with good management practices to give these different groups different rights of access when no studies have been conducted that find paddlers to create more impact on an environment.

This is a dangerous precedent to set for the stewardship of all our Wild and Scenic rivers, most of which are regularly enjoyed by kayakers with no adverse impact.

I ask that you disregard the recommendation in the current EA and conduct the user capacity study on all reaches of the Upper Chattooga before another EA is issued to the public.

Please note my comments in this regard, and feel free to contact me for more information.

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