From:	Steve Frazier
To:	comments-southern-francismarion-sumter@fs.fed.us; Don Kinser
Subject:	Upper Chattooga Project Comments
Date:	08/15/2008 12:37 PM

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

August 15, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,
My name is Steve Frazier. I have been coming from my home in suburban Atlanta to the Chattooga River since 1982 for several reasons. I like to hike, fish, canoe, swim and generally enjoy the river and its surrounding area. However, my main passion is whate water paddling. I own 9.3 acres of land near the lower reaches of Section 4 that I plan on building a house on for my retirement years.
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 Environmental Assessment (EA) is not a user capacity analysis and does not reference one. American Whitewater's (AW) appeal decision required a user capacity analysis. Where is it? Making this decision with out the **REQUIRED** EA boarders on being illegal and will certainly be challenged in court if necessary.
- 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 Wild and Scenic Rivers Act was designed to protect rivers for **ALL** users, **INCLUDING** white water enthusiasts.
- No alternative the Forest Service has formulated is acceptable because

they all include boating bans on the upper Chattooga Cliffs reach and on tributaries – without any justification.

- 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 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 impact intensive uses are not seriously considered for limits. The Forest Service obviously made this decision with something besides the environment in mind. If they were considering the environmental impact of the user groups while making this decision, I wonder what user group they would have alienated. Maybe hikers and anglers who frequently leave trash? Maybe horse back riders who cause lots of erosion? It certainly wouldn't have been white water paddlers.
- 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. It is easy to see through this. Clearly, the Forest Service can *technically* say the ban on white water boating is now lifted, yet it will be **EXTREMELY** difficult (by design) for people to get on the river, especially people like me that live two hours away.
- 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 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.

Unfortunately, it has become apparent over the duration of this 13 year process that white water paddlers are being singled out and have been unfairly targeted as the only user group that is restricted in its use of the Chattooga River. Considering that white water paddlers are the group with the **SMALLEST** environmental impact, this decision was obviously made using other criteria. It is **BLATANTLY OBVIOUS** that the folks making this decision are anglers who selfishly want to keep the upper Chattooga to themselves.

It is very disappointing to me that the USFS has come to this conclusion. Sadly, this situation is a lot like leaving the fox in charge of the hen house. It is great for the fox, but a disaster for everyone else.

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

Steve Frazier
4465 Patrick Dr. NE
Kennesaw, GA 30144-1642