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Subject:	Comments on the Chattooga River Recreational Managerment Alternatives - From a Citizen in Maryland
Date:	08/17/2008 09:09 AM

Dear Representative of the Wild and Scenic Chattooga River,

I am both past Executive Director of American Whitewater and president of its board of directors, and have spent the last year developing a grassroots program across the United States to celebrate the 40th Anniversary of the Wild and Scenic Rivers Act for American Rivers. I have been kayaking on the Chattooga River since 1979, appreciate it for its exquisite quality and its accessibility as the centerpiece of your great National Forest and have traveled to paddle the Chattooga from Cincinnati, Atlanta, Charlotte, Easley, SC and now my home outside of Washington, DC.

In principal, 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 specific areas that protect a special interest from having to share the resource.

I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River, and find the Alternatives unacceptable for they 1) are founded on a continued poor understanding of the low-impact nature of non-motorized boating and 2) unfathomably favor an intense desire to maintain the good-old-boy, status quo boating ban among anglers.

The closest to acceptable among the Alternatives is Number 8, which 1) fully allows boating on the entire Chattooga River and its tributaries, 2) includes encounter standards based on a real user capacity analysis, and 3) will equitably limit total use only when encounter standards are consistently exceeded, preceded by employing all available indirect measures.

The EA and preferred alternative are not equitable or protective of the river because they consider boaters to be the only management entities, while larger more impactive uses are not seriously considered for limits. It offers no basis for the boating bans and limits and lacks a full range of alternatives. It differs little from than the last one, is at least a year late and has wasted countless tax dollars, including resources spent by the USFS for qualified consultants whose input was ignored.

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 existing uses in unlimited numbers. This is not equitable, not acceptable, and would be laughable if it were not so transparently biased.

A 450 CFS average daily flow trigger included in Alternative #4 should be eliminated from any considerations. The cost to implement a public notification of the flow and enforcement of the restriction is proof of its irrationality.

I suggest that if you are going to limited usage that you conduct a valid capacity analysis and allow boating in the same numbers, places, and seasons that those applied to existing users.

Thank you for considering these comments,

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