From:	Christopher Meyer
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Fair Access to the Chattooga River
Date:	08/15/2008 12:16 PM

U.S. Forest Service

Chattooga River Project

4931 Broad River Road

Columbia, SC 29212.

comments-southern-francismarion-sumter@fs.fed.us

CC: Representative John Lewis, Senator Saxby Chambliss. Senator Johnny Isakson

August 15th, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

As a Georgia resident and avid outdoors-man I fully understand and appreciate the need to preserve our most cherished natural resources. I enjoy all aspect of wilderness including hiking, camping, fishing and boating and I know how easily cherished natural resources can be mismanaged. In my opinion to favor one type of recreational activity over another is not right, has no legal basis and violates the intent of the Wild and Scenic Rivers Act.

Before any recreational activity is banned on a Wild and Scenic River, material harm from this activity to the river should be demonstrated by

the managing authority. Having reviewed the Environmental Assessment regarding the recreational management of the Chattooga River I strongly disagree with your analysis and your proposal. This Environmental Assessment is neither complete nor fair. Please consider the following:

- The EA offers no basis for the boating bans and limits. The EA is not a user capacity analysis and does not reference one. The AW appeal decision required a user capacity analysis. Without a demonstration of material harm to the river that would result from boating there is not basis for regulation of this activity on the Upper Chatooga. The USFS has spent thirteen years searching for a reason to limit paddling on the Chattooga and has found *none*.
- Arbitrarily banning boating on this river is unacceptable and sets a dangerous precedent.
- No alternative is acceptable because they all include boating bans on the upper Chattooga Cliffs reach and on tributaries – without any justification.
- The EA and preferred alternative are not equitable or protective of the river because they considers boating to be the only management variable, while other larger more impactful uses are not seriously considered for limits.
- 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!
- 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.

Thank you for considering these comments. Please conduct a real user capacity analysis and immediately allow boating in the same numbers, places, and seasons that you allow other existing users. Paddling should be allowed in a similar manner to your alternative number 8 on the *entire* Upper Chattooga River and its tributaries.

Thank you for considering these comments,

Sincerely

Christopher Meyer

914 Collier Rd, apt 1006

Atlanta, GA 30318