From: Clayton Gaar
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: RE: Chattooga River Project Comments
Date: 08/17/2008 06:45 PM

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17 August 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

My name is Clayton Gaar. I am a student attending UNC Asheville. My entire life I have lived in Atlanta, GA and since I was a toddler my parents have been taking me to visit the Chattooga River. This is a place where many of my childhood experiences and memories come from. My parents taught me how to whitewater kayak on this river and named me Clayton after the nearby town of Clayton where they fell in love. The Chattooga River is a precious gem that I and many of my friends hold dear to our hearts.

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. It seems that boaters are being unfairly targeted in the proposals I have seen. Please consider the following concerns I have regarding this issue:

* 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 have seen zero valid reasons for why boating should be banned on the river.
* The EA is not a user capacity analysis and does not reference one. The AW appeal decision required a user capacity analysis. Where is it?
* No alternative is acceptable because they all include boating bans on the upper Chattooga Cliffs reach and on tributaries ? without any justification. There needs to be justification for there being no alternatives that include boating on those stretches of water.
* 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. Boaters are THE most environmentally aware group of users of the Chattooga area and have the least impact on the river and surrounding ecosystem.
* 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 offers no basis for the boating bans and limits
* The EA lacks a full range of alternatives
* 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. This is especially true of users, like boaters, that repeatedly show that they are respectful of the wilderness area.
* 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 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.

Please let us float down these river peacefully! That is all we ask!

Sincerely
Clayton Gaar
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