From:	ww seal
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Euitable Access to Upper Chattooga River - EA Analysis
Date:	07/10/2008 12:33 PM

Dear Sumter National Forest,
My name is Jim McCool. I'm a whitewater kayaker from Middle Tennessee and have been paddling all over the United States, Chile, Canada, and Mexico. I have had the pleasure of paddling Sections III and IV of the Chattooga many times over the past twelve years. I am writing to voice my interest in paddling the upper stretches of the Chattooga currently limited to fishermen, hikers, and campers.

I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposal. I ask you to treat me and my community of river enthusiasts with the same regard as existing outdoor enthusiast utilizing this natural area of Sumpter National. Please consider the following concerns I have regarding this issue:

The periods where kayakers and whitewater enthusiasts will most likely choose to paddle Sections OO and OI are unlikely to interfere with fishermen as the river levels will be unsafe for wading or floating in tubes;

The most likely periods for rain in the region of the Chattooga sections mentioned are during the late fall and early spring which are also seasons that experience lower visitation by fishermen, hikers, and campers;

Boaters generally cause less environmental wear and tear due to time spent on the river versus building campfires, trampling vegetation, leaving behind garbage, and bait containers;

Boaters generally carry safety and rescue equipment and watch out for each other. Campers, hikers, and fishermen don't carry rescue equipment and require assistance from Park Service Rangers or other rescue personnel.

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 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.
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 reaches – while allowing all other 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 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.

Please consider conducting a valid user capacity analysis and immediately allow boating in the same numbers, places, and seasons that you allow existing users to enjoy this beautiful, natural resource.
Paddling should be allowed in a similar manner to your alternative number 8, including the entire Upper Chattooga River and its tributaries.

Thank you for considering these comments,

Sincerely

Jim McCool

Mount Juliet, TN 37122