From: Wade Vagias
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: EA Comments
Date: 07/02/2008 03:14 PM

July 2, 2008

To whom it may concern:

ALTERNATIVE #4 IS UNACCEPTABLE FOR THE FOLLOWING REASONS:

1. The Upper Chattooga is a public river that has never been open to boating. Limiting boating without extended user trials (opening it for a certain period of time during which scientific study is undertaken) or empirical evaluations of impacts (sociological/ ecological) is both WRONG and UNJUSTIFIED. Thus, Alternative #8 is the only justifiable alternative proposed by the USFS and Alternative #4 should be abandoned in favor of Alternative #8.

2. By including use stipulations for boaters, the preferred EA is ILLEGAL according to the Wilderness Act. Thus, Alternative #8 is the only justifiable alternative proposed by the USFS and Alternative #4 should be abandoned in favor of Alternative #8.

3. By including use stipulations for boaters, the preferred EA is ILLEGAL according to the Wild and Scenic Rivers Act. Thus, Alternative #8 is the only justifiable alternative proposed by the USFS and Alternative #4 should be abandoned in favor of Alternative #8.

4. You state 450 cfs is the highest level for fishing and an optimum for boating. Thus, fisherman are allowed access for an entire flow 'window' (lowest flows to what is considered maximum for fishing) while boaters only get 'half a window' (from optimum boating flow to what is considered maximum). This is unfair for potential boaters with no empirical evidence to suggest this is the best alternative. Further, according to the stipulations detailed in Alternative #4, boaters will only have, on average, 6 days of sufficient flows/year. THIS IS UNACCEPTABLE FOR A PUBLIC RIVER! Thus, Alternative #8 is the only justifiable alternative proposed by the USFS and

Alternative #4 should be abandoned in favor of Alternative #8.

5. Without empirical analyses, there is no evidence that conflict between boaters and anglers would occur on the upper river. Thus, EA (#4) is based on unsubstantiated claims and is UNJUSTIFIED. Alternative #8 is the only justifiable alternative proposed by the USFS and Alternative #4 should be abandoned in favor of Alternative #8.

6. Why limit boating to periods between 12/1 & 3/1? Again, no empirical evidence to suggest a seasonal time constrictions is justified. Thus, Alternative #8 is the only justifiable alternative proposed by the USFS and Alternative #4 should be abandoned in favor of Alternative #8.

7. Alternative #8 is the only justifiable and defensible alternative offered by the USFS. However, it is my opinion that you included the point "allows the use of rafts, a craft type no considered in any other alternative" to nullify any consideration of this alternative. It is my position that the USFS change its preferred alternative from #4 to #8 and eliminate the use of rafts from the upper river.

Your management direction regarding boating on the upper river has, for the past 30 years, been inconsistent with the management of other, similar federally managed rivers. Please take this opportunity to show that you are capable of making the correct decision and choose Alternative #8. This would show your management to be consistent with the laws and acts that you operate under. Any option other than #8 is ILLEGAL, UNJUSTIFIED, and is INCONSISTENT with other federally managed Wild and Scenic Rivers.

In sum, I am in completed disagreement with preferred EA #4 and respectfully request you eliminate #4 in favor of #8.

Thank you for you consideration.

/s/ Wade Vagias

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