From:	Mark Scantlebury
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River Project Comments
Date:	07/16/2008 04:15 PM

July 16, 2008

Dear Sumter National Forest,

As president of the Lower Columbia Canoe Club in Portland, Oregon (www.l-ccc.org), I represent over 200 paddling families who take trips all over the United States to paddle whitewater rivers. Born and raised in Virginia, I've paddled extensively in the SE U.S.

I have carefully reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. Unfortunately, I strongly disagree with your analysis and your proposal. Both treat paddlers like me and my community of river enthusiasts unfairly and ignore my interests. Please consider the following concerns I have regarding this issue:

- The proposed alternative negatively impacts protections granted under the Wilderness Act and Wild and Scenic Rivers Act on the Chattooga and other rivers nationwide.
- The USFS has spent thirteen years searching for a reason to limit paddling on the Chattooga and has found *none*. I've read article after article about this and can only said it's time to open the river to boating.
- The EA is not a user capacity analysis and does not reference one. The American Whitewater appeal decision required a user capacity analysis. Where is it?
- None of the alternatives is acceptable because they all include boating bans on the upper Chattooga Cliffs reach and on tributaries – without any justification.
- The EA offers no basis for the boating bans and limits and lacks a full range of alternatives. Currently, they're just different flavors of the same thing and unfair to the boating community.
- The USFS has hired qualified consultants and then ignored their input. This is simply a waste of taxpayer money.
- Paddlers prefer an alternative that's closest to Alternative 8, but 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.

I 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 it should be on the *entire* Upper Chattooga River and its tributaries. Paddling is a low impact sport. What's more, paddlers are some of the best conservation forces you can put on a river.

Thank you for considering these comments.

Sincerely,
Mark Scantlebury
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