From: Halladay, Tom
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: Chattooga River Project Comments
Date: 07/16/2008 02:37 PM

July 16'th, 2008
RE: Chattooga River Project Comments
Dear Sumter National Forest,
My Name is Tom Halladay. I am from Wilmington, Delaware. Professionally I am an IT Consultant, but recreationally I am an active whitewater kayaker, a Boy Scout Leader, and an active member of the American Whitewater organization as well as my local paddling group; the Wilmington Trail Club.
I am extremely upset to hear that the USFS is completely disregarding the Wilderness Act and treating private boaters like 3'rd class citizens in our nationally protected forests and the rivers within them. What right do hikers or fisherman have to have exclusive, unrestricted access, while kayakers would virtually be banned from the Chattooga? The boating bans currently being imposed as well as the ones being planned are without authority, and without merit.
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. Please consider the following concerns I have regarding this issue:

- The proposed alternative will negatively impact 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*. 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?
- 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 EA offers no basis for the boating bans and limits
- 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.

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.
Thank you for considering these comments,
Sincerely
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