From:	Rice Family
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga
Date:	07/16/2008 10:36 PM

July 16, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

I am a whitewater kayaker and canoeist from Northern Virginia. I have supported local communities in Virginia, Maryland, West Virginia, Tennessee, North Carolina,and Georgia by patronizing small businesses located near canoeing and kayaking runs. The Chattooga access if of special interest to me.

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.
- No proposed 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 EA offers no basis for the boating bans and limits
- 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.

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,

Len Rice
4903 Fox Creek Court
Chantilly, Virginia 20151