From:	Brad Brewer
To:	comments-southern-francismarion-sumter@fs.fed.us; akimbell@fs.fed.us
Subject:	Support of Alternative 8
Date:	08/18/2008 12:06 AM

.S. Forest Service
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.
comments-southern-francismarion-sumter@fs.fed.us

August 17, 2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

My name is James B Brewer and I am writing in support of Alternative 8. I quite honestly feel that this would be something that would happen in Russia or some other country that the US…… a group of users that are not being allowed to use the river because of pure ignorance. That in part of those that wrote the original law and those that currently support it, especially the USFS. I did my master's research on the nearby Chauga River for my Master's of Science in Civil Engineering studying sedimentation in the river. What I found was that the group that degraded the stream the most was the anglers which was apparent in the variety of angler trash in and around the river and their access points in which they do not like to hike but drive down to the river which further degrades the river with erosion. If you don't believe me, maybe you should start basing your management based on things called 'research', etc. I would be glad to provide you a copy of the report although you should already have it (or threw it away with all of the other viable research). I also noticed that same thing on the Chattooga River and the West Fork. I've also been kayaking for over 15 years most of which was in the Chattooga watershed and over that period of time I never saw any conflict with fisherman and boaters. Those that say any different are ignorant. Anglers like low water and boaters like high water….. so there is not conflict. I recently moved to California 4

years ago and quite frankly, I am embarrassed to say I am from the southeast because of this political BS…… but then again, nobody is surprised. This is just the backwards type behavior that the rest of the country would expect from a bunch of hicks trying to rule the river….. KUDOS! It is quite funny though, no where else in the whole country area there conflicts between user groups but you have done a good job and pitting the user groups against each other….. another KUDOS! But alas, you better stay with that nice & cushy govt job because you wouldn't last 2 seconds in the real world.

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 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 reach – while allowing all other wilderness conforming 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.

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

James B Brewer
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