From:	Wade Vagias
To:	comments-southern-francismarion-sumter@fs.fed.us
cc:	tlwhite01@fs.fed.us; jthomas01@fs.fed.us
Subject:	Upper Chattooga EA Comments
Date:	07/28/2008 10:45 AM

Mr. Jerome Thomas-

I have carefully reviewed the Environmental Assessment (EA) regarding management of the Upper Chattooga and ask you to consider two question:

1. Where is the equity in the preferred EA?

2. Where is the empirical evidence to support the preferred EA?

I want to remind you that Ms. Gloria Manning, Reviewing Officer for the Chief of the USFS, stated "SNF RLRMP record, however, is deficient in substantiating the need to continue the ban... No capacity analysis is provided to support restrictions or a ban on recreation use or any type of recreation user. While there are multiple references in the record to resource impacts and decreasing solitude, these concerns apply to all users and do not provide the basis for excluding boaters without limits on other users."

Based on the direction provided above by the CHIEF OF THE USFS, I IMPLORE YOU TO CONSIDER BOTH THE EQUITY OF YOUR DECISION AND THE OVERWHELMING LACK OF EMPIRICAL EVIDENCE IN YOUR PREFERRED EA as you consider the following:

1. EMPIRICAL EVIDENCE? An EA is NOT a user capacity analysis. Where is the user capacity analysis specifically detailed on page A-6 of Appendix A of the Decision for Appeal? Ms. Manning directs the Regional Forester to "conduct the appropriate visitor use capacity analysis." WHERE IS IT??? Your decision is based on hearsay and is completely unsubstantiated (zero empirical evaluation). 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. Not once have you

empirically linked resource impacts to boaters.

2. EQUITY? By including use stipulations for boaters, the preferred EA is ILLEGAL according to the Wilderness Act. Again, following direction provided in the Decision for Appeal provided by Ms. Manning, your decision is not consistent with direction provided in Sections 2(a) and 4(b) of the Wilderness Act.

3. EQUITY? By including use stipulations for boaters, the preferred EA is ILLEGAL according to the Wild and Scenic Rivers Act. Again, Ms. Manning draws reference to Section 10(a) of the Wild and Scenic Rivers Act, which, again, you are not consistent with.

4. EQUITY? Where did the 450 cfs cut-off come from? This flow level is the highest level for fishing and an optimum for boating. In short, 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.

5. EMPIRICAL EVIDENCE? You repeatedly make reference such as "This alternative is designed to minimize conflict between anglers and boaters..." (page 8 , Chapter 2, Alternatives in detail). Where is the evidence that there would actually be conflict between anglers and boaters? Can you cite one study, not just anecdotal evidence?

6. EQUITY? Why limit boating to periods between 12/1 & 3/1? Where is the empirical evidence to suggest a seasonal time constrictions is justified? Why are anglers not limited seasonally?

7. EQUITY? Why does the preferred EA only allow use in a portion of the Upper Chattooga (County Line Road Trail to Burrell's Ford Bridge) while anglers have access to the entire upper river? Where is the equity in this alternative?

USFS management of the Upper Chattooga 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 reconsider your alternatives.

This would show your management to be consistent with the laws and acts that you operate under.

Thank you for you consideration of my comments.

/s/ Wade Vagias
107 Hartwell Drive
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In the end, our society will be defined not by what we create, but by what we refuse to destroy - John Sawhill

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