From:	Ed Crockett
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River Project
Date:	08/05/2008 11:06 AM

Dear Sumter National Forest,

I am writing from Denver, Colorado to voice my comments and concerns on the Environmental Assessment regarding the recreational management of the Chattooga River. Living in Colorado provides me with an opportunity to experience some of the most beautiful areas of our country and the hard work performed by the Forest Service staff. I was extremely disappointed to hear of the Foresat Services plan to extremly limit access to the whitewater paddling communtiy on the Chattoga River. I was dismayed to find out the Forest Service hired qualified consultants at taxpayer expense then choose to ignore the consultants recommendations. We here in Colorado are fortunate to have the Poudre River designated as a Wild and Scenic River and the paddling community as a whole is quite proud of that desigantion and make sure to treat the area as the type of pristine wildernees that it is. I will be contacting Congessman Udall and Senators Allard and Salazr here in Coloardo to lobby on behalf of the paddling community.

Please consider the following concerns I have regarding this Chatooga 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.

Regards,
Ed Crockett

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