From: info@sierranevadaoutdoors.com
To: comments-southern-francismarion-sumter@fs.fed.us
Subject: RE: Chattooga River Project Comments
Date: 08/05/2008 10:02 AM

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

8/5/08

RE: Chattooga River Project Comments

Dear Sumter National Forest,

My name is Kent McCracken. I currently live in Reno Nevada. I work as a kayak instructor and have for the past twenty years. My job has provided the ability to travel and see many lands, rivers, and managed recreational resources throughout the US, Europe, South and Central America, Australia, New Zealand, and Canada. This is the first occasion in 25 years of whitewater boating in which I have encountered a ban on paddling a public resource.

My primary concern and issue with the proposed ban on boating on the Chattooga River is that neither I nor my children nor grandchildren nor my clients may ever have the opportunity to paddle this section of river. I lived in North Carolina for two years and was able to paddle many of the south east's quality river runs with the exception of the upper Chattooga river due to this ban.

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:

1. This is the first river I have been banned to paddle on four continents, eight countries, thirty states, and one planet!

2. 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.

3. 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?

4. 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.

5. 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!

6. The EA offers no basis for the boating bans and limits.

7. 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.

8. The USFS hired qualified consultants and then ignored their input.

9. 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.

10. The public should have the right to float on public Wild and Scenic Rivers regardless of who owns the land along the river.

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.

Sincerely,

Kent McCracken
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