From:	Frank Lorch
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	RE: Chattooga River Project Comments
Date:	08/06/2008 09:22 PM

Dear Sumter National Forest,

I am an avid whitewater kayaker from Charlotte, NC. Not only do I love boating, but I love and respect the environment in which I am privileged to pursue it. I have reviewed the Environmental Assessment (EA) regarding the recreational management of the Chattooga River and 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 EA lacks a full range of alternatives and no alternative is acceptable because they ALL include boating bans on the upper Chattooga Cliffs reach and on tributaries – without any justification.
- 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!
- I 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 EA offers no basis for the boating bans and limits. It is not a user capacity analysis and does not reference one. However, the American Whitewater appeal decision required a user capacity

analysis. Where is it?

- The USFS hired qualified consultants and then ignored their input.
- *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,
Frank Lorch