From:	tom saffell
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	RE: Chattooga River Project Comments
Date:	08/08/2008 06:44 PM

U.S. Forest Service
Chattooga River Project
4931 Broad River Road
Columbia, SC 29212.

August 8th

RE: Chattooga River Project Comments

Dear Sumter National Forest,

I am a white-water kayaker resident in California. I am writing to you now to express my concern at the EA regarding the recreational management of the Chattooga River.
It saddens me that the public's right to enjoy our natural resources is under threat from the wishes of a few powerful groups and lobbyists. This seems very unAmerican to me.

I have reviewed the Environmental Assessment regarding the recreational management of the Chattooga River. I disagree with your analysis and your proposal. Both of these 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 is not a user capacity analysis and does not reference one. The AW appeal decision required a user capacity analysis. Where is it?
- 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 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.

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.

I urge you to spend time in the company of kayakers on the river. You will soon see that they are fun loving, caring for the environment around them, and sensitive to the needs of other land users around them.
Get on the river, and see what all the fuss is about :)

Thank you for considering these comments,

Regards,

tom saffell