From:	Williams, Loren
To:	comments-southern-francismarion-sumter@fs.fed.us
cc:	akimbell@fs.fed.us
Subject:	Chattooga River Project Comments
Date:	08/07/2008 03:46 PM

Dear Sir/Madam:

My name is Loren Williams. I live in Decatur, Georgia and have been a recreational whitewater boater since 1974. Over the last 34 years, I have spent numerous days boating on all sections of the Chattooga river, including two seasons as a guide with a commercial rafting company licensed to run trips there.

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 the community of river enthusiasts unfairly. Please consider the following concerns I have regarding this issue:

- All aspects of the "Outstanding Remarkable Values" of Wild and Scenic Rivers should be protected on the entire river, not just in some areas, and the public should have the right to float on public Wild and Scenic Rivers regardless of who owns the land along the river.

- 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 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.

- 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.

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,

Loren Williams
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