From:	Tripp Culbreth
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	RE: Chattooga River Project Comments
Date:	07/10/2008 10:52 AM

Dear Sumter National Forest,

My name is Reese Culbreth and I live in Raleigh, NC and I enjoy whitewater kayaking. I am extremely concerned about the management decisions being made regarding boating the Chattooga river as these decisions could adversely effect boating rights in all national forest service managed rivers and creeks.

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:

- 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 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 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. The reality is that when there are boatable

water levels that fisherman will not be fishing because of the poor fishing conditions and therefor there will be little chance of encounters between boaters and fisherman. Not that encounters are a negative experience as we should all accept and share this wonderful resource reasonably and equally.

- 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.

Thank you for considering these comments,

Sincerely,
Reese Culbreth
1806 Bickett Blvd.
Raleigh, NC 27608