From:	Christine Cubillo
To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River Project Comments
Date:	08/07/2008 01:39 PM

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

8/7/2008

RE: Chattooga River Project Comments

Dear Sumter National Forest,

My name is Christine Cubillo and I am a whitewater paddler in northern California. 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 public should have the right to float on public Wild and Scenic Rivers regardless of who owns the land along the river.
- It is unethical to limit river access only to specific/favored groups (anglers) and the justification is poor: "solitude from boaters". Private boaters also enjoy the peacefulness of the river and have just as much right to enjoy it as the anglers do.
- No alternative is acceptable because they all include boating bans on the upper Chattooga Cliffs reach and on tributaries – without any justification.
- The EA and preferred alternative are not equitable or protective of the river because they consider 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 lacks a full range of alternatives.
- 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.
- 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

Christine Cubillo
8426 Adagio Way
Citrus Heights, CA 95621