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Subject: Upper Chattooga River Environmental Assement
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The Wild and Scenic Upper Chattooga River borders North Carolina, South
Carolina, and Georgia, and has been banned to kayaking, canoeing and rafting for over 30 years - without any basis. The US Forest Service has prepared a new Environmental Assessment (EA) of the issue that recommends maintaining the ban - once again with no basis.

The proposed management action on the Chattooga will influence the management of rivers across the country and would create a selfishly motivated precedent that would negatively impact rivers, managers, and recreationists. Private landowners are seeking a monopoly on a Wild and Scenic public river, the Forest Service is seeking to strip basic protections from Wild and Scenic Rivers, and other stakeholders claiming zero-tolerance of paddlers are seeking to have paddling prohibited. Boaters are irrationally being singled out for adverse treatment, even while the Chief of the Forest Service directed that all users be treated equitably. Many river professionals and Forest Service personnel are behind us, but it is up to us to stop this nationwide train wreck.

The EA follows the same format as the Forest Service's past assessment of the issue: they list a string of ecological effects common to all recreation, then discuss abstract user conflicts that have never occurred and will never occur, and then make a recommendation that essentially renews the ban on floating the Upper Chattooga River, while allowing all existing recreational users unlimited access without providing any rational basis for the discrimination. There are a few differences though. They propose to allow a few people to paddle roughly a third of the upper river somewhere between zero and six days a year in the middle of winter at high water based on an impossible set of logistical hurdles. This miniscule paddling allowance is so small and bizarre it is realistically a total ban. The rest of the upper river and its tributaries remain totally off limits to paddlers. A second major difference is the exclusion of the uppermost section of the Chattooga and its tributaries from even a cursory discussion. In addition, this EA cost taxpayers several million dollars.

The EA is not viable and breaks many basic rules and laws for preparing such documents. It is quite clearly not a scientific document; it is a philosophical and political one. It flies in the face of the successful American Whitewater appeal decision that required a user capacity analysis (which has not been conducted) and equitable treatment of all users if limits are needed to protect the resource. The new EA essentially claims that the river has a capacity of zero boating and a capacity of infinite hiking, angling, and camping. That is hardly equitable.

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