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To:	comments-southern-francismarion-sumter@fs.fed.us
Subject:	Chattooga River boating ban
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Attachments:	Final Chattooga comments.rtf

To: U.S. Forest Service
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First, I want to express my disappointment and disgust in your office for wasting millions of dollars of taxpayer money on what has turned out to be a farce, since this "Environmental Assessment" proves you never had any intention of giving paddlers a fair outcome. I had hopes the USFS would reach a fair and equitable solution. I could not fathom that professional land managers could conduct this long, involved and costly process and still try to exclude the lowest impact, wilderness compatible form of human powered recreation from a National Wild and Scenic River.

Once again you have offered no scientific justification for continuing this ban, or for managing a river corridor so that other wilderness compatible users – hikers and anglers – don't have to see whitewater canoe and kayak paddlers.

I have asked myself how your office could go against the ruling of the U.S. Forest Service chief, who ruled years ago in favor of equal access and treatment, and issue this document without conducting a true user capacity analysis. I can only conclude that some sort of cronyism or deep-seated political pandering is behind this indefensible decision.

The blame for this disaster rests squarely upon Sumter National Forest, in my opinion. It is not the trout fishermen's fault. Thirty years ago, the USFS granted anglers and anti-paddling locals a false entitlement to exclusive use of the Chattooga's upper 30 miles. Nowhere else in the United States does the USFS prohibit whitewater paddling, so the ban remains inconsistent with national river management. If allowed to stand, it will set a dangerous precedent in which meddling bureaucrats elsewhere will further restrict our God given freedom to paddle wild rivers and coexist with other user groups.

Nowhere in the analysis is this basic question answered: Why are anglers entitled to a stream devoid of paddlers? We share rivers everywhere else in the United States, and just about everywhere Trout Unlimited and paddlers are natural allies in river conservation. The

USFS/SNF has created a poisonous and false user conflict where non exists by granting fishermen a "paddler-free" river for 30 years.

SNF is also shirking its duty to protect and provide equal access to the Chattooga Cliff and Rock Gorge/Big Bend sections of the Upper Chattooga. The fact that the uppermost section is excluded from review strengthens the concern that your office bans boaters there at the behest of the Whiteside Cove Association and its allies. But a National Wild and Scenic River is not meant to be an exclusive playground for the rich and politically connected. Unfortunately the USFS has a history of bowing to such interests, as it did when it failed to acquire the land along the Upper Horsepasture River when a few miles away from the Upper Chattooga when Duke Energy put that tract up for sale.

It appears that SNF reached its preferred alternative with the intent of throwing paddlers a tiny bone in the form of overly restrictive and impractical boating opportunities on only one third of the Upper Chattooga, believing that this would hold up in court. It will not. By failing to conduct a true user capacity analysis, and by unfairly singling out boaters while granting other non-motorized users unrestricted access, your office has assured there will be a rigorous, justified and ultimately successful court challenge.

To summarize:

— This "EA" is a clearly a political, not a scientific document, which offers no basis for continuing the boating ban.

— The proposal to allow for a few small parties to paddle one third of the headwaters from zero to six days a year during the dead of winter at high water amounts to a continued ban. There is no way a paddling group will be able to ascertain a 450 cfs average daily flow until the day is over. The river is clearly boatable at lower flows, yet those would still be sub-optimal for trout fishing and naturally limit any contacts between boaters and fishermen.

— You cannot, under the Forest Chief's order, severely restrict paddling and allow all other wilderness compatible users unrestricted access access, yet this is what this "EA" proposes. It will not stand in a court of law.

— To avoid litigation and more wasted millions of tax dollars, the USFS should immediately lift the ban as specified in alternative 8 on all the Upper Chattooga below Grimshaws. This will provide a real world user analysis and show the fears fostered by three decades of segregation and false entitlement to be unfounded. If there are needs for reasonable restrictions to truly protect the resource, paddlers will not oppose them.

It is time for your intractable bureaucracy to stop playing "nanny state" and allow American paddlers, hikers and fishermen to share this outstanding resource we all love, as we do on every other river on the United States. I am saddened that it will apparently take a court challenge, wasting more taxpayer dollars and diverting funds that are badly needed for river conservation elsewhere, to right this wrong. We look forward to repairing our natural alliances with trout

fishermen once the USFS gets out of the way and allows us to interact peacefully and with due consideration for each other on the headwaters of the Chattooga.

E.H. Metzger