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February 25, 2022

Re: Proposed permanent closure of Maryland Heights parking areas

Dear Superintendent Brandyburg,

American Whitewater is a national non-profit organization dedicated to the conservation and restoration of our nation's whitewater resources, and to enhancing opportunities to enjoy them safely. We are a member-based organization representing conservation-oriented whitewater kayakers, rafters, and canoeists who connect with nature and special places through spending time on the water. We are among the leading advocates for the protection and restoration of our nation's headwater rivers and streams. Importantly for this project, we have played an important role in developing the Harpers Ferry River Access Plan.¹

The Needles Section of the Potomac River is an outstanding feature of the Park, allowing citizens to experience the Park's historical, scenic, and recreational resources by boat. The section is an important component of the regional paddling resources by offering an intermediate and accessible whitewater run in a beautiful and interesting setting close to large population centers.

The Maryland Heights parking area is used as both a put in and take out for whitewater paddling, and its closure would diminish the accessibility and enjoyment of the Park. In our exhaustive public process that led to the Harpers Ferry River Access Plan one thing was extremely clear: access to the two exceptional whitewater runs in the area is severely under-sized, and is consistently getting smaller through closures like the one currently proposed.

We ask that Maryland Heights not be closed. We understand that the site is under-serving demand, but that is all the more reason to maintain and improve it rather than eliminate it. The rivers in Harpers Ferry need all the parking and access they can get - not less.

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The mitigation measures proposed by the park do not help paddlers wanting to enjoy the Potomac River in this area. As far as we know boats are not allowed on the shuttle bus, and the alternative parking is not helpful as river access.

By far the biggest limit on enjoyment of the Park by canoe and kayak is the prohibition of river access and egress along the river near Lower Town. This was the historical and desired takeout for both the Shenandoah and the Potomac rivers, but is now prohibited in the Superintendent's Compendium. The scant other access options have only a few parking spaces, and are not friendly to those with disabilities or other significant physical limits. We would welcome the opportunity to discuss restoring river access permissions in and near Lower Town to help alleviate the severely limited options for river access in the area, and if needed to help mitigate the impacts of closing Maryland Heights.

Thank you for considering these comments and this request.

Sincerely,

Kevin Colburn

National Stewardship Director

American Whitewater

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