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U.S. Forest Service
Chattooga River Project
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Thank you for this opportunity to submit comments regarding the future management of the Chattooga headwaters. I am a whitewater kayaker from Washington, DC. I have never visited the Chattooga, but I hope to someday. It has a nationwide reputation as a place of outstanding beauty.

It is my opinion that the boating ban on the Chattooga headwaters is arbitrary, biased, and sets a bad precedent for the management of other Wild and Scenic rivers. The Chattooga is the only river in the entire Forest Service system where boating is banned, and if I am not mistaken the ban violates both the Wilderness Act and the Wild and Scenic Rivers Act. The origins of the ban are murky, but I've heard three basic arguments that attempt to justify it:

1. Boating is a dangerous activity.

   I will agree that boating has inherent dangers, but so do many other outdoor activities such as climbing, skiing, and even hiking. That doesn't mean boating can't be pursued safely and responsibly, and it certainly doesn't mean boating should be singled out for exclusion. Moreover, the people who are most capable of evaluating the dangers of boating are boaters themselves.

   Let me use Great Falls of the Potomac River as an example. It's far more difficult and dangerous than anything in the Chattooga headwaters, and it's in the middle of a national park. Despite the significant dangers of Great Falls and the high degree of skill required to navigate it safely, boaters enjoy open access. The non-boating public has the perception that the boaters who run Great

Falls are reckless, but they couldn't be further from the truth. According to NPS records, there have been 52 deaths at Great Falls since 1972. Of those, only 2 were kayakers running Great Falls. To put that in perspective, there were 2 sunbathing deaths during the same time period. That's right, sunbathing. The most dangerous recreational activities were rock hopping (13), swimming (10), and fishing (6). One might argue that this was simply due to sheer numbers, but I disagree. There is a large boating community on the Potomac River, and boaters frequent it more often than regular park visitors. I have personally run Great Falls over 300 times in the past two years and I've never needed rescue or medical treatment. The fact of the matter is, boaters have a better understanding of the dangers of whitewater than anyone else, and are better equipped to handle it. On numerous occasions, boaters have pulled people out of the river who almost certainly would have drowned. There is every reason to believe the same would be true on the Chattooga.

2. Boating degrades the environment.

Boaters leave footprints in two locations: the put-in and the take-out. In-between, they float on the water and leave no trace. The same can't be said for hikers, campers, and fishermen. If there are unauthorized trails and campsites, river bank erosion, and trash left behind in the Chattooga headwaters, you can be sure they weren't caused by boaters because they have been banned for the past 30 years. I am in favor of user restrictions to protect the wilderness character of the Chattooga, but only if the restrictions are based on a user capacity analysis and apply to all user groups equally.

3. Boating interferes with other recreational activities (fishing in particular).

Why is there a double standard? Don't boaters have the same right as everyone else to enjoy "solitude" and the "unique and remarkable beauty" of the Chattooga? If it can be argued that boating interferes with fishing, can't it also be argued that fishing interferes with boating? I can't tell you how many times I've been caught in fishing line that was cast directly across my path or that was snagged underwater and left there like tripwire. That doesn't

mean fishing should be banned; it just means that I need to be aware of my surroundings, I need to give fishermen a wide berth whenever possible, and I need to carry a knife in case I get tangled up. Likewise, fishermen can look where they're casting, wait until boaters have passed, and move to another location if the river is too crowded. There is no "conflict" that requires Forest Service intervention.

Over and over again, fishermen say that boaters "spook" fish. Do they mean to imply that a barbed metal hook in the mouth doesn't spook fish? Is there any non-anecdotal evidence to prove this assertion? And even if there is evidence, why are spooked fish the Forest Service's problem? By the same logic, birdwatchers could demand that Boy Scout troops be banned because they scare away the birds. The argument doesn't hold any water.

The Preferred Alternative (#4) essentially upholds the ban on boating while allowing unlimited access to every other user group. Restricting boaters to one-third of the upper Chattooga, during winter months, on days when the predicted mean daily flow is greater than 450 cfs, is no different than a ban. Why only one-third of the river? Why only during the winter? Other user groups don't have those restrictions. How are you going to predict the mean daily flow of the river? How are you going to communicate that to boaters far enough in advance for them to take advantage of it? Why not let boaters decide for themselves what is sufficient flow? Boaters get skunked all the time; we drive 3 hours to our favorite creeks only to discover they aren't running after all, and we're ok with that. But we're not ok with bureaucratic red tape that applies to us and nobody else, that wastes the time and money of everyone involved, and that does nothing to protect the wilderness character of the river in question.

I sincerely hope that a better alternative is proposed.

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