

**Tennessee Paddlesports Association Summary of Comments**  
**on the Report by TACIR on *Managing Tennessee's Public Waterways for Recreation:***  
***Balancing Access, Safety, and Protection of Natural Resources.***

**Overall observations on study conclusions and process**

Our view is that the study's strongest recommendations are the strategies and solutions for funding improved infrastructure for outdoor recreation and for paddlesports. This initiative should also look at the missions, strategic plans, and funding strategies for TWRA and TDEC to determine if adjustments are needed to prepare for current demand and future growth of the state's population. We very much appreciate the diligence of the Commission and the TACIR staff in preparing this important report.

**Conclusions and recommendations should be based on direct observation and empirical data to the extent possible.** We believe there are several issues in the study that rely on opinions and inaccurate statements that do not paint a complete or accurate view of those issues. TACIR's recommendations should be based on direct observations and empirical data rather than accepting the assertions of stakeholders. While stakeholder input is important, that input should be used to direct further inquiry and evidence gathering.

**We agree with the following study recommendations:**

- We strongly agree with the finding that "Multiple agencies regulate Tennessee's waterways, potentially resulting in burdensome regulations, confusion, and limited access for different user groups."
- Representation on the Fish and Wildlife Commission for Commercial Paddlecraft Outfitters and Non-Fish and Game Recreation is important.
- While we concur with the conclusion that outdoor recreation is on the rise, it is not clear that paddlecraft uses are continuing to increase and there will be more congestion. Better data is needed as the study indicates.
- We appreciate the review of possible funding strategies and support redirecting some of the state's portion of the sales tax on outdoor recreation gear and sales to provide funding for recreation.

**The study does not fully recognize outfitter actions to deal with litter, trespass, safety, and user conflicts**

- Our observation is that most recreation rivers are not littered. Access points and boat ramps are littered at times, but outfitters are often helping in areas where they operate by removing litter.
- The study does not recognize the actions taken by outfitters to reduce the potential for trespass as cited in our comments regarding the Little River.
- Likewise, new empirical data shows Canoe the Caney's efforts to reduce user conflicts on the Caney Fork River and the implementation of Best Practices by members of the Tennessee Paddlesports Association.
- A review of safety data from the TWRA and the U.S. Coast Guard will reveal that most of the safety incidents involve private boaters and not customers of paddlecraft outfitters.

**We disagree with revising the TWRA Paddlecraft Outfitter Advisory Committee, which was authorized by the legislature to advise the agency specifically on outfitter regulations.**

Thank you for reviewing our summary comments on the study. Please read TPA's entire comment submission to TACIR for more details on these issues.