



[www.americanwhitewater.org](http://www.americanwhitewater.org)

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July 19, 2017

Tennessee Valley Authority  
c/o Russell D. Smith  
400 W. Summit Hill Drive, WT-11D  
Knoxville, Tennessee 37902  
Submitted electronically to: [PLIC@tva.gov](mailto:PLIC@tva.gov)

Dear Mr. Smith,

American Whitewater is a national non-profit organization with a mission to conserve and restore our nation's whitewater resources and to enhance opportunities to enjoy them safely. Our members are primarily non-commercial kayakers, rafters, and canoeists, and significant portion of our membership lives in the region served by the TVA. Many of our members regularly visit the Ocoee River to enjoy its treasured rapids. The historic flow releases on the middle and upper Ocoee have had profound benefits to the regional economy and the quality of life of our members. Our interest is in no net loss of releases, and we are supportive of continuing the current or an enhanced flow regime into the future and offer the following scoping comments to that end.

**We support full consideration of the proposal described by TVA in the scoping notice, with minor caveats.**

The TVA proposes to continue the historic flow regime on both the upper and middle Ocoee River for the next 15 years, except that a block of weekday releases in the fall will be eliminated. At this time we support this proposal and its full consideration, with the caveat described below concerning continuation of the fall block of weekday releases without charge.

One very important element of the scoping notice, which we request be carried forward in the NEPA analysis is the statement that: "The proposed water release agreement would not apply fees or restrict access to private boaters." Our support of the proposed future management is contingent upon this statement remaining in the plan.

**We request that the TVA fully consider the benefits of Ocoee River releases on the local and regional economy.**

The releases on the Ocoee River area create major economic benefits for the region and the rural area nearest to the river. A recent study found 622 jobs and an economic impact of \$43.83 million associated with whitewater rafting throughout the 2012 paddling season.<sup>1</sup>

A Forest Service and TVA analysis of the Upper Ocoee found significant economic benefits of releases on that reach in a 1997 Environmental Impact Statement titled Upper Ocoee River Corridor Land and Water-Based Recreational Development.<sup>2</sup>

American Whitewater created an online survey regarding paddling the Ocoee River in 2016 that received 762 responses, 673 of which were private boaters. Key results are summarized below and additional data is available upon request.

- 70% of respondents stay overnight in the area, 60% of respondents typically camp.
- 88% of respondents sometimes go out to eat when visiting the Ocoee, and over half go out to eat in the area more than 10 times annually.
- 38% of respondents spend \$21-40/day, and 44% spend more than \$40/day.
- The average daily expenditure reported from private paddler respondents was greater than or equal to \$49.72 per person (n=667). When multiplied by the 15,712 private user days on the Upper and Middle Ocoee in 2015, this results in local annual private boater direct expenditures of \$781,195. The full economic impact of private boating is significantly higher than this figure based on the standard economic practice of factoring in multipliers to direct expenditure data.
- 78% of respondents said they would surf at a whitewater park if one were available. Respondents would go out to eat, shop, bike, hike and camp more if better options existed.

The economic benefits of the Ocoee dam releases are vital to the regional economy and far outweigh the foregone power generation revenues associated with the program. TVA's analysis of the release program must fully account for these benefits at the local and regional scale.

**We request that the TVA provide historical releases not paid for by the proposed payment agreements free of charge as a public benefit.**

The scoping notice outlines a plan that includes a schedule framework and proposed schedules for 2019, and a proposal to eliminate a block of fall weekday releases. It is unclear whether and how this schedule could be changed in the future based on any number of factors. To ensure a sound NEPA process that analyzes the actual flow regime to

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<sup>1</sup> See [http://www.americaoutdoors.org/america\\_outdoors/pdf/Ocoee2pp.pdf](http://www.americaoutdoors.org/america_outdoors/pdf/Ocoee2pp.pdf)

<sup>2</sup> See <https://www.gpo.gov/fdsys/pkg/FR-1997-02-21/pdf/97-4323.pdf>, and <https://www.gpo.gov/fdsys/pkg/FR-1997-04-18/pdf/97-10008.pdf>

be provided, and to provide the paddling community with certainty in the flows that will be provided, we request that the TVA explicitly state that there will be no net loss in releases for the forthcoming 15 years.

We also request that TVA explicitly commit to provide any historic release days not covered or funded through the payment system as a public benefit free of charge. This includes the fall block of weekday releases that TVA has proposed to eliminate, and any releases that may be unfunded in the future via unforeseen circumstances.

**We request that the TVA consider modest increases in flow volumes (total of 1200-1500cfs) during some releases to provide higher quality recreation experiences.**

One of the primary findings of our private boater survey was an interest in slightly higher Middle Ocoee releases, in the range of 1200 to 1500cfs. We ask that TVA consider the costs and benefits of such releases in the analysis. We propose that these slightly higher releases could enhance the recreation experiences of commercial customers as well as private paddlers, leading to increased visitation. It may be that these higher flows could be utilized during shoulder season or other times of lower visitation to attract more visitors to the area, or they could be employed during seasons of greater water availability.

**We request that the TVA consider the benefits of the Ocoee release program on rare plant species compared with the release program in the Hiwassee River below Apalachia Dam.**

Ruth's golden aster, *Pityopsis ruthii*, is a federally endangered endemic plant that's sole habitats are the bypassed river reaches of the Ocoee and Hiwassee rivers. Annual monitoring from 1987 through 2014 revealed that Ocoee populations have consistently grown to more than double their original size over that timeframe. Monitoring since 1987 of three Hiwassee River sites has shown consistent declines in populations of Ruth's golden aster, with current populations roughly half of their 1987 levels.<sup>3</sup>

The distinct flow regimes of these two rivers are often cited as the primary driver of the plant's divergent population trends. The middle Ocoee's roughly 116 annual pulse flow releases, mostly during the growing season, appear to benefit Ruth's golden aster. There are no analogous pulse flows on the Hiwassee River below Apalachia Dam, where flows are typically flat-lined at a very low level for the entire year. The result has been significant woody vegetation encroachment in the Hiwassee River channel, and indeed the river channel is essentially forested in some sections.<sup>4</sup>

The current and historical flow regime on the Ocoee is working for Ruth's golden aster. Significant reductions in releases would make the Ocoee flow regime more similar to the

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<sup>3</sup> Moore, Philip A., et al. Current knowledge, threats, and future efforts to sustain populations of *Pityopsis ruthii* (Asteraceae), an endangered southern Appalachian species. *Journal of the Torrey Botanical Society* 143(2): 117–134, 2016.

<sup>4</sup> *Id.*, pg. 123

Hiwassee flow regime, and could reverse the positive population trends of the Ocoee population of the plant. We request that TVA acknowledge the relationship between the flow regimes of these reaches and Ruth's golden aster populations. The data on this rare plant suggest that continuing a release schedule similar to the current schedule on the Ocoee River would likely continue to benefit Ruth's golden aster.

At the same time, to quote the US Fish and Wildlife Service, the data "suggest that providing periodic intermediate-to-high flows could be an important component of management to improve growth rates in the Hiwassee population and reduce the extinction risk it faces," and that "Improved flows will be an important component in any long-term solution for controlling vegetation succession and maintaining suitable habitat conditions for *P. ruthii* in the Hiwassee drainage."<sup>5</sup> We request that the TVA analysis contain a comparative analysis of Ruth's golden aster population trends between the two rivers, and that that analysis trigger an immediate and separate assessment of the need for ecological pulse flows on the Hiwassee River downstream of Apalachia Dam.

**We request that the TVA consider access improvements for private paddlers.**

Our survey produced many calls for improved take out facilities on the Middle Ocoee. We request that TVA consider the costs and benefits of investing in improved and expanded take-out options for private boaters on the Middle Ocoee.

Our survey also produced many comments requesting that the Upper Ocoee put in remain open for longer hours for post-trip vehicle recovery. The locking of the gate is a limiting factor to use, and one easily resolved. We request that TVA consider investing in solutions to this problem, such as automatic gates or expanded staffing and parking hours.

Thank you for considering these comments.

Sincerely,



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<sup>5</sup> U.S. Fish and Wildlife Service, Southeast Region, Tennessee Ecological Services Field Office. Ruth's Golden Aster: 5-Year Review: Summary and Evaluation.  
<https://www.fws.gov/southeast/pdf/five-year-reviews/ruths-golden-aster.pdf>