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[gamelandplan@ncwildlife.org](mailto:gamelandplan@ncwildlife.org)

Re: Green River Gamelands Management Plan

Dear NC Wildlife Resources Commission,

American Whitewater would like to thank the NCWRC for the opportunity to provide comments on the development of a management plan for the Green River Gamelands. American Whitewater is a national non-profit organization dedicated to conserving and restoring our country's whitewater resources, and to enhancing opportunities to enjoy them safely. We have over 5,500 members - typically non-commercial kayakers, rafters, and canoeists - many of whom regularly paddle the Green River. We look forward to working with the NCWRC on the development of a management plan that works for fish, wildlife, and a diverse array of recreational visitors.

The mountains of Western North Carolina have played a prominent role in the development of modern whitewater paddling, especially creek boating. Today, the region is not only a sought after destination for paddlers from across the globe, but also a home for many paddlers. Regional paddling events draw hundreds or thousands of attendees, paddling related businesses like Liquid Logic kayaks and Astral Buoyancy have located here, and you can find even paddler-themed restaurants. Paddling has been part of the social and economic fabric of the region for at least half a century, and remains so today more than ever.

The Green River, as it flows through the Green River Gamelands, is at the heart of this long-standing paddling culture. Many of our members have chosen to live, work, raise families, and start businesses in the upstate of South Carolina and Western North Carolina because of the Green River. Ask a paddler in Japan, Chile, or New Zealand if they have heard about the Green and you'll likely get a nod and a smile. The Green is an incomparable and irreplaceable whitewater paddling resource.

The reasons for the Green's allure are many. It offers a diverse array of high quality paddling opportunities including the Class II-III Upper Green,<sup>1</sup> the Class V Narrows,<sup>2</sup> and the Class I-II Lower Green.<sup>3</sup> All three reaches benefit from roughly 300 days of near-optimal dam releases each year, with world-class rapids formed by polished bedrock. The intact forest offers paddlers and other visitors scenic natural vistas from the river. There is simply no other river quite like the Green. It is a recreational resource without

<sup>1</sup> See: <http://www.americanwhitewater.org/content/River/detail/id/1079/>

<sup>2</sup> See: <http://www.americanwhitewater.org/content/River/detail/id/1080/>

<sup>3</sup> See: <http://www.americanwhitewater.org/content/River/detail/id/1081/>

peers, and its value as a paddling destination cannot be overstated.

We greatly appreciate the stewardship efforts of the NCWRC that have protected the Green River, its watershed, and its public enjoyment.

With this context in mind, we are pleased to offer the following responses to the questions raised in your online request for comments, and those discussed at the public meeting.

- What habitats do you think are most important to protect and/or improve on the Green River Game Land?

Much of the Green River Gamelands is comprised of steep forested lands that are potentially prone to erosion. We feel that the lands that are visible from the river, and those deemed highly capable of delivering sediment to the river, should be maintained in a forested state. Doing so will protect the views from the centerpiece of the Gamelands – the Green River itself. It will also protect the water quality and fisheries of the Green River, and protect the regionally rare large contiguous block of forest habitat.

We also value the aquatic habitats of the Green and Big Hungry rivers. We fully support the removal of two dams on Big Hungry Creek, and would like to participate in any public dialog about these dam removals. We have significant experience with dam removals elsewhere, and may be able to add value to the effort.

- How do you use the Green River Game Land?

Our members paddle each section of the Green River. Upper Green paddlers launch at the public access area near the Tuxedo Powerhouse and paddle to the mouth of Big Hungry Creek, where they then hike up the trail to a private parking area on Gallimore Road. Green River Narrows paddlers most often hike down the trail at Gallimore Road, launch near the mouth of Big Hungry Creek, and take out at the Fishtop Access Area. Lower Green paddlers launch at the Fishtop Access Area and take out at various locations downstream. Many of our members also hunt, fish, and hike in the Green River Gamelands.

- Please explain why you think the current level of access is, or is not, satisfactory on the Green River Game Land?

The current level of access could benefit from some improvements. Currently, the private parking area on Gallimore Road near the confluence of Big Hungry Creek offers the only egress for citizens wanting to paddle the high quality Class II-III Upper Green without also paddling the Class V Narrows. It also serves as a convenient launch point for paddlers wanting to run the Narrows without running the Upper Green. A permanent public access option in this vicinity is needed to ensure future access to the Green River, and would also benefit hunters, anglers, hikers, and other visitors.

- What suggestions, if any, do you have for changing how the Green River Game Land is managed and maintained?

We would like to see a continued dialog and partnership between the NCWRC and the paddling community to address river access. We suspect that such a partnership could improve the conditions and public enjoyment of the Gamelands while also reducing management costs for NCWRC. Specifically, we believe that the paddling community may be able to assist with trail maintenance and/or the creation of new or expanded access sites. We would welcome the opportunity to be part of such a partnership effort.

- What would encourage you to start using the Green River Game Land, or to continue using it more actively?

The Green River is already a world-class recreational treasure. The only hurdle to paddling use is the lack of adequate public parking providing trail access to the Big Hungry confluence with the Green River. While a private solution to this problem currently exists on Gallimore Road, the lack of a permanent public option could become a significant problem at any time.

- What additional comments do you have about the Green River Game Land?

The discussions at the public meetings brought up at least two additional topics we would like to comment on.

At least one meeting attendee requested that paddling be prohibited in the Narrows several days each week to benefit their fishing experience. The Narrows fishes best when the dam is not releasing, so anglers and paddlers rarely encounter one another. The occasional interactions that do occur are overwhelmingly positive or neutral. We believe there is no need to institute limits on paddling, which is an economically and recreationally vital activity on the Green River. Such limits would simply do no good, while doing much harm to the citizens of North Carolina.

Secondly, cuts to your agency's budget and potential remedies were discussed at the meeting. We are disappointed by these cuts, which we believe represent poor understanding and appreciation for the social and economic importance of NCWRC's management of active outdoor recreation on Gamelands. We welcome opportunities to highlight the value that your agency provides for local economies, especially regarding your stewardship of the Green River Gamelands. We understand that new user fees were discussed as a potential remedy for these budget cuts. We hope new user fees will not prove necessary, and that active partnerships can instead help offset budget reductions. If fees do prove necessary to protect the Green River and its enjoyment, we would like to request a public dialog regarding the fee structure.

Thank you for considering the interests of the Green River paddling community.

Sincerely,



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American Whitewater