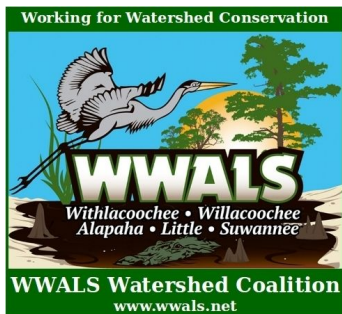


November 27, 2017

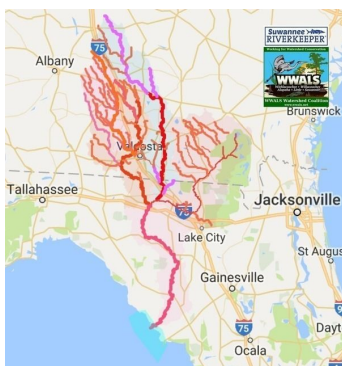


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the WATERKEEPER® Alliance
Member for the Suwannee,
Withlacoochee and Alapaha Rivers



- ◆ Upper Suwannee River HUC 03110201
- ◆ Withlacoochee River HUC 03110203
- ◆ Alapaha River HUC 03110202
- ◆ Little River HUC 03110204
- ◆ Lower Suwannee River HUC 03110205
- ◆ Suwannee River Estuary

WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.



Re: Paid permits for non-motorized boats

Dear E.D. Wiley, Chairman Brown, and Chairman Griswold,

As the head of an organization that holds many paddle outings in Florida, I thank you for holding a public meeting tomorrow of the Boating Advisory Council that could finally put to rest the ill-advised idea of charging permit fees for paddle boats or boards. Unfortunately, I will not be able to attend, so I am sending this letter.

Thank you, FWC Executive Director Wiley, for saying back in February (Kevin Spear, Orlando Sentinel, February 1, 2017, ["Florida agency head won't support fees for kayaks, canoes"](#)):

"The FWC appreciates the work of this advisory group, but we are not supportive of increasing fees on Floridians or visitors who participate in non-motorized boating,"

Thank you, NMBWG Chairman Griswold, for the NMBWG [24-pages of recommendations of May](#) saying:

"The majority of the non-motorized boats working group agrees that the non-motorized boating community already contributes to the user-pay/user-benefit without registration."

And thank you, Captain Griswold, for saying three weeks ago (Kevin Spear, Orlando Sentinel, November 10, 2017, ["Florida controversy persists over need for kayak and canoe registration and fees"](#)):

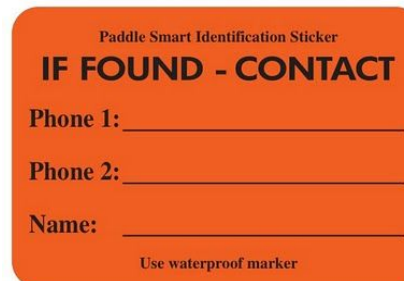
"There is a great resistance to imposing a fee."

Indeed, there is, and for good reasons, the simplest of which is that advocates of such a fee have not provided any convincing evidence that there is any need for it. Quite the opposite: evidence presented to the NMBWG by the American Canoe Association in 2015 shows accidents and fatalities among paddle boaters are going down while the number of boaters is going up.

Paddlers often pay state park fees, outfitter fees, and many buy fishing licenses, so they already are paying for use.

Paddlers do not require large, constructed boat ramps, docks, extensive parking, or fueling facilities such as at marinas, so there is no need for them to be charged for such amenities.

If lost boats are an issue, the Coast Guard already provides a Paddle Smart Identification Sticker, which we recommend all paddle boaters use.



Regarding safety, all outfitters I am aware of emphasize safety, as do paddle clubs and Riverkeepers. For example, we begin all of our outings with a safety lecture and both of our water trails (the [Alapaha River Water Trail](#) and the [Withlacoochee and Little River Water Trail](#)) emphasize safety and etiquette, as does the pre-existing [Suwannee River Wilderness Trail PADDLING GUIDE](#).

One size does not fit all. These water trail guides all address rapidly varying river levels, which are very important to safety, yet this point does not seem to have been covered by the NMBWG. Perhaps that is because our blackwater rivers in the Suwannee River Basin are different from the rivers in more populated regions of the very diverse state of Florida. The Suwannee River Basin is among the least densely-populated areas of the state, and what might apply near dense urban areas may not be appropriate where we are.

Additional reasons include:

- Neither the NMBWG nor especially the BAC has adequate representation for paddlers.
- Some BAC committee members seem to have backgrounds ill-suited for the slots they occupy. For example, David W. Childs is the BAC [“one representative of water-related environmental groups.”](#) yet according to his law firm biographical page he represents “business and local government clients” and “Florida electric utilities”.
- Mr. Childs and Ms. Rebecca Bragg appear to be among two or three BAC members who have served past the limit of two terms mandated by state law.

Mr. Childs was quoted as saying a few weeks ago (Kevin Spear, Orlando Sentinel, November 10, 2017, [“Florida controversy persists over need for kayak and canoe registration and fees”](#)):

“The state is going to continue to grow,” said Childs, a lobbyist for the power-boat industry. “My concern is that we have enough access for the general public to water so they can go out there and enjoy.”

If more people moving to Florida is the real motivation, it’s not clear to me how paddlers are the problem. If the BAC wants more marinas, docks, or fueling facilities people moving into new developments, perhaps it should consider recommending development impact fees.

The NMBWG appears to be the third committee BAC has formed about fees for paddle boaters, each time failing to get a recommendation to do it. It’s past time to abandon that idea.

Please at the BAC meeting tomorrow lay to rest the idea of paid permits for paddle boats and boards.

For the rivers and the aquifer,

-jsq

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