



Kevin Colburn
National Stewardship Director
PO Box 1540
Cullowhee, NC 28723
828-712-4825
www.americanwhitewater.org
kevin@americanwhitewater.org

March 8, 2022

Re: Bobby Setzer Fish Hatchery Redesign

Dear District Ranger Casey,

American Whitewater is a national non-profit organization dedicated to the conservation and restoration of our nation's whitewater rivers, and to enhancing opportunities to enjoy them safely. We are a member-based organization representing conservation-oriented whitewater kayakers, rafters, and canoeists who connect with nature and special places through spending time on the water. We are among the leading advocates for the protection and restoration of our nation's headwater rivers and streams. We have staff in Western North Carolina that regularly paddle the Davidson River, and attended a site visit to the dam and hatchery. We have reviewed the proposal to rebuild and enlarge the existing Bobby N. Setzer State Fish Hatchery along the Davidson River and have the following comments.

We request that the low head diversion dam spanning the Davidson River associated with the intake for the fish hatchery be removed and replaced with a dam-free alternative as part of this project.

The diversion dam poses significant hazards to paddlers, anglers, and swimmers by creating a dangerous retentive hydraulic capable of entrapping people, especially at higher flows. Low head dams are a leading cause of paddling deaths on rivers, responsible for at least 10% of river paddling fatalities in our accident database.¹ Dangerous low head dams should not be located on rivers, especially on public lands, unless they are absolutely necessary. The Davidson River dam in particular is a high-hazard design and is located on a river popular with paddlers at high water and other users at all water levels. It is located just upstream of the takeout for the Upper Davidson whitewater run.² In addition to its risks, the dam also requires a portage that degrades the recreational experience.

¹ See the AW Accident Database: <https://www.americanwhitewater.org/content/Accident/view/>

² See: <https://www.americanwhitewater.org/content/River/view/river-detail/3681/main>. Note that the page depicts the run ending at the dam to emphasize portage, but paddlers often portage and take out downstream.

The diversion dam poses a likely barrier for aquatic species movement that likely has significant impacts on species of concern. The dam requires regular dredging that likely triggers turbidity events and impacts the natural sediment movement regime of the river. The dam has visual impacts to Forest visitors. The dam raises the upstream water levels, making a flood prone area even more flood prone, thereby threatening the public investment in the hatchery and the hatchery itself. The dam, in short, has many impacts, and only one easily replaceable benefit.

We should point out as well that the Davidson River is managed as eligible for Wild and Scenic designation by the Forest Service. The dam is not compliant with Section 7 of the Wild and Scenic Rivers Act, and therefore is not compatible with the eligible Wild and Scenic River status. Removing the dam would remedy this problem.

Removing the dam makes sense, and it makes sense as part of this project. Removal would have many benefits for the Davidson River by eliminating all of the impacts noted above. There are technical solutions to withdrawing water from the Davidson River that do not require a dam. The dam is an inseparable part of the hatchery and it would not be defensible to exclude removing it from this full rebuild of the hatchery. We ask that the Forest Service bring the dam into the scope of the Project, consider removal options, and select a dam removal option.

In addition to dam removal, we request that the project include parking and river access to maintain the recreational value of the current hatchery parking area as a public river access site. Lastly, we request that the utmost emphasis be placed on releasing clean water back into the Davidson River. Fish hatcheries can be responsible for significant nutrient loading, odors, and other water quality impacts.

Thank you for considering these comments and this request, and please do not hesitate to contact me if you have any questions regarding these comments or paddling the Davidson River.

Sincerely,



Kevin Colburn
National Stewardship Director
American Whitewater
kevin@americanwhitewater.org