



1777 N Kent St #100
Arlington, VA 22209

March 11th, 2022

National Forests in North Carolina
160 Zillicoa St
Ste A
Asheville, NC 28801

Dear District Ranger Casey, Supervisor Melonas and Deputy Supervisor Fitzsimmons,

Trout Unlimited is a national non-profit whose mission is to bring together diverse interests to care for and recover rivers and streams so our children can experience the joy of native and wild trout and salmon. TU's North Carolina Council includes over 5,000 members spread across the state. Every year, TU staff and members provide on-ground support and fundraising for coldwater resource projects and education in partnership with National Forests in North Carolina and North Carolina Wildlife Resources Commission. This includes a focus on the Davidson River Watershed where TU supported the Davidson River Habitat Enhancement Project, numerous aquatic organism passage projects and streambank stabilization after Tropical Storm Fred.

We have reviewed the scoping documents for the special use permit for the Bobby Setzer Fish Hatchery Redesign and are submitting the following comments. Portions of these comments have been presented directly by TU and additional partner organizations to NCWRC in writing on 5/20/2020 and 12/14/20, as well as at an in-person site visit on 11/17/20. NCWRC provided no alternatives to their initial design nor provided any data to indicate they fully explored alternatives.

Trout Unlimited requests that any special use permit for the hatchery must include a design that addresses the low-head dam and associated water intakes on the Davidson River. The current proposal calls for demolition and complete replacement of almost every other structure associated with fish production except these structures. While we understand there is a need for consistent water flow, the current proposal does not incorporate or address the ecological issues that are caused by the current system. We also believe the project footprint and map should incorporate the area on the Davidson River that contains the dam and intake system, which it currently does not.

Structures such as the low-head dam negatively impact river ecology in a number of ways. This dam inhibits the movement of wild trout, Eastern hellbender and a variety of other non-game fish species that live in the waterway. Lack of this type of connectivity can decrease genetic diversity and limit access to important stream resources. It also alters the natural flow of stream-building materials, such as spawning gravel and coarse wood pieces, further hurting these aquatic populations.

Beyond ecology, the current system also limits recreational opportunity and creates a safety concern. This structure is not navigable by paddlers using the river. Water flowing over the dam also poses significant hazards to paddlers, anglers, and swimmers by creating a dangerous retentive hydraulic capable of entrapping people, especially at higher flows. The Davidson River is one of the most popular sites for river recreation and these recreational issues will only be exacerbated with increased use.



Authorizing the special use permit as-is violates several components of the new Nantahala-Pisgah Forest Plan. Specific desired conditions, guidelines and standards that are not in alignment with this plan are listed below. While NFsNC are not officially operating under this plan, it does represent the direction the agency is headed and may be officially in place before the project would start. Review of this special use permit should be done through the lens of this plan.

- AQS-DC-01 • AQS-DC-08 • LSU-G-04 • WTR-DC-04 • WTR-DC-09
- AQS-DC-02 • AQS-S-01 • LSU-S-06 • WTR-DC-05
- AQS-DC-04 • LSU-DC-04 • REC-DC-05 • WTR-DC-06

TU has heard and understands NCWRC's concerns with removing or retrofitting the dam to allow for aquatic organism passage, specifically that the current system is operational, that modern alternatives are not as certain and concerns about biosecurity due to private hatchery fish entering the system. We understand there are risks with modernization but also believe that advances cannot be made by relying on decades-old technology because it is semi-functional at this time. Hatchery staff have indicated increased sedimentation issues coming from the intakes over the past few years. Solutions within the system may limit sediment getting into the raceways but nothing addresses the intakes themselves.

In relation to biosecurity, there has been no actual threat analysis provided by NCWRC to demonstrate this is a meaningful concern. While there are private production facilities within the greater French Broad watershed, they are located miles away on other smaller river systems. There is one private section of the Davidson River that conducts stocking. However, NCWRC staff have stated the source of these fish are not the biosecurity concern. A diseased fish would then need to escape the private production facilities in one of the other subwatersheds, safely navigate through river systems that are not considered year-round trout habitat, not be caught in the hatchery-supported section of the Davidson River at the campground and make it to the hatchery-area alive. Additionally, the dam only provides biosecurity protection from one potential vector. If a diseased fish were to make it to the base of the dam, a variety of predators that inhabit the area could potentially kill and move the carcass above the dam. TU agrees that private production facilities in North Carolina need better biosecurity oversight but believes this is an unrelated issue.

TU appreciates the concept of modernizing the Bobby Setzer Fish Hatchery to be more efficient in water use and outflow water quality. Removing or retrofitting the dam structure to allow for aquatic organism passage and recreational use makes sense and should be a part of this project as well. The general hatchery layout has been in place for 50 years and the state of North Carolina is looking to approve significant expenditures to essential build a new hatchery facility, minus the intake structure. Incorporating these changes during this construction phase could potentially create a cost-savings for the dam component, ensures the state of North Carolina participates in correcting the issues on the river itself and brings potential project partners and funding to the table at a time of historic investment in this type of infrastructure. There are no guarantees that these will be true for a future project to address this issue and the likelihood that any significant changes can be made to the intake structure once the hatchery rebuild has been completed seems small.

Thank you for considering these comments in the project scoping. Please contact me if you have any questions regarding these comments and concerns.

Sincerely,

Jeff Wright
Southeast Project Coordinator
Trout Unlimited
jeff.wright@tu.org