



Kevin Colburn, National Stewardship
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October 16, 2023

Submitted Electronically

Attention: Setzer Fish Hatchery Project

Dear Ms. Connor,

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 Environmental Assessment on the proposal to rebuild and enlarge the existing Bobby N. Setzer State Fish Hatchery on the Davidson River and have the following comments.

On March 8, 2022 we asked in scoping comments 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. In our scoping comments we shared that the dam is a significant recreational hazard, diminishes recreational values of the river, increases the likelihood of flooding, serves as a barrier to aquatic species, and degrades the free-flowing status of the river. In our comments we requested the dam be removed and replaced with a less harmful water intake structure. We are aligned with other outdoor recreation and conservation groups with this request, including angling-oriented groups.

Rather than consider dam removal, the EA deems the dam outside of the scope of the project, despite this being the primary topic raised during the public scoping process and the sole excluded part of the fish hatchery infrastructure. This omission serves to protect a 1950s era piece of infrastructure that is too impactful to be built in modern times. Avoiding a chance to restore such a treasured aquatic system on the Forest is disappointing, especially so with the new forest plan's emphasis on restoration and the public interest in multi-purpose projects. We hope the Forest will reconsider, and we reiterate our request that dam removal be fully considered and endorsed for this project.

The EA errs in its analysis of the cumulative and other effects of the project with regards to the effects of trout stocking associated with the project. The analysis recognizes the recreational benefits of trout stocking as a core element of the project several times (including as justification for considering the non-USFS hatchery an administrative site), but does not offer

commensurate recognition of the predation, competition, behavioral and other impacts of that stocking on hellbenders and other native aquatic species. This is relevant in part because dam removal would serve as a small but achievable mitigation measure for these impacts if they were to be acknowledged.

The EA misses recreational mitigation that we feel the project should include, even with its limited scope. Specifically, we ask that the final plan include a simple portage trail around the dam and intake structures for paddlers traveling downstream, and a very small launch area at the trailhead parking lot that could also serve as hardened access and egress for anglers and other river users.

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,

A handwritten signature in black ink, appearing to read 'K. Colburn', with a stylized, flowing script.

Kevin Colburn
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