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Hearing Officer Steve Tedder
C/O John Downey
NC DWQ
401/Wetlands Unit
Parkview Building
2321 Crabtree Blvd.
Raleigh, NC 27604

Re: 401 Certificate for Removal of Dillsboro Dam on the Tuckasegee River, FERC Project No. 2602

October 16, 2007

Dear Mr. Tedder,

American Whitewater is a national nonprofit organization dedicated to protecting and restoring our nation's whitewater resources while enhancing opportunities to enjoy them safely. We have roughly 7000 members and 100 affiliate clubs. Most of our members are conservation oriented whitewater kayakers, canoeists, and rafters. A portion of our membership live near the Dillsboro Project, and our main office is located just a few miles upstream in the town of Sylva, NC. We have several hundred dues paying members that are North Carolina citizens. American Whitewater fully participated in the process, studies, and negotiations that lead to the signing of the comprehensive settlement agreement regarding the Tuckasegee and Nantahala rivers. We are signatories to that settlement agreement and therefore fully support the removal of Dillsboro Dam. We ask that NC-DWQ issue the necessary permits for the removal of Dillsboro Dam as described in the settlement agreement.

The removal of Dillsboro Dam should be considered in a watershed based context – rather than on a single site basis. The comprehensive settlement agreement that calls for the removal of the dam is based on a watershed context. It is in this context that the removal of the dam is absolutely essential for the integrated restoration of the watershed. Removal of the dam is mitigation not just for the impacts of the dam itself but for impacts of other dams elsewhere in the Upper Little Tennessee River watershed. These mitigation trade offs are described in some detail in the settlement agreement itself, and are of vital importance to our organization. Of the potential mitigation opportunities throughout the watershed, American Whitewater views the removal of Dillsboro Dam as disproportionately valuable to the native species in the system.

The removal of Dillsboro Dam will benefit river paddlers that currently travel from around the state and region to paddle the Tuckasegee River. The removal will restore roughly a mile of shallow slack water back to a flowing river that may contain

interesting river features. The removal will eliminate a mandatory and man-made portage on the river for paddlers. The removal will expose banks which once vegetated will act as a visual buffer between the river and developed areas. The removal will create new river access opportunities. The dam site itself will hold special interest to paddlers based on the history of the site, and possibly because of currently inundated small bedrock rapids visible in historic photos of the site. In short, the removal will significantly enhance the beneficial use of boating on the river.

We encourage the DWQ to look at the removal in a long term context rather than a short term context. Restoration projects almost always have short term impacts, be they aesthetic, ecological, or economic. Restoration projects also however have long term aesthetic, ecological and economic benefits that far exceed the short term impacts. We estimate that most of the impacts of the removal effort will dissipate in a matter of months – not years. The benefits however will last generations. For example:

- While the dam removal may cause stress or even mortality to some individual Appalachian elktoe mussels during a short window of time, it will benefit the Tuckasegee population and the species as a whole by significantly expanding the available habitat for generations or perpetuity. Habitat will be restored under the current reservoir site, and connectivity to that area and to the several miles of upstream river will be restored. The Tuckasegee is a wide shallow river with ample mussel habitat. The benefits of 10 miles of additional habitat are remarkable for this species.
- While the dam removal may initially result in muddy riparian areas with little habitat or aesthetic values where the reservoir once inundated the banks, re-vegetation will occur rapidly. The seedbank and natural growth rates in the southeast result in rampant re-growth of herbaceous and woody vegetation. It is likely that this process can and will be accelerated by riparian plantings of native trees and shrubs. We encourage the planting of *only* native and site appropriate species following established planting protocols. The site should be green within the first few weeks of the growing season and have significant vegetative cover within the first growing season. For people who prefer natural rivers over man-made impoundments, the site will be far more attractive for perpetuity. Regardless of human opinions, native species of fish, birds, wildlife, and insects which disproportionately occupy and rely upon riparian areas will benefit from the draining and vegetation of the reservoir site.
- While the dam removal will initially result in increased sediment loads downstream of the dam site, within a period of time ranging from days to a few years the sediment reach will return to baseline conditions. This is a small price to pay for eliminating the constant and total inundation of 1 mile of the Tuckasegee River under *several feet* of sediment behind the dam. The impacts of sediment discharges will last a short time depending on flows, yet will yield benefits that last in perpetuity. Likewise while multiple downstream individual fish may experience some hardship due to the increased sediment (note that they are used to lots of sediment under the baseline conditions), these same fish will gain 10 miles of new habitat and benefit potentially as individuals and absolutely

as populations. Once the short term sediment impact is gone, the fish will flourish like never possible prior to removal.

We should also note that we are not excessively concerned with the role of sediment in this dam removal. The Tuckasegee is a naturally and un-naturally sediment laden river. We feel that at high flows it has the capacity to transport significant sediment downstream without impacts that unacceptably exceed baseline conditions. Obviously, dredging and removal of the sediment prior to dam removal would be preferable to a staged removal that flushes the sediment downstream. While this would be preferable, we do not view it as necessary.

As a case study of a similar restoration and removal effort, we would like to suggest that the DWQ review the Cove Project on Idaho's Bear River. This similar sized dam was removed in the fall of 2006, and by the summer of 2007 one could barely even tell the river segment was ever dammed. Several photos of the site can be viewed at: http://www.americanwhitewater.org/content/River_detail_id_5125_. You may wish to contact Mark Stenberg at PacifiCorp (Mark.Stenberg@PacifiCorp.com) for more information.

Thank you for considering these points and our interests. Please issue the permits necessary for the removal of Dillsboro Dam promptly.

Sincerely,

Kevin R. Colburn