



Remove the Vincent and Plymouth Dams

February 9, 2009

Lieutenant Colonel Thomas J. Tickner
District Engineer
U.S. Army Corps of Engineers
Philadelphia District
Wanamaker Building
100 Penn Square East
Philadelphia, Pennsylvania 19107-3390

RE: CENAP-OP-R-2007-1079-61 Vincent Dam
RE: CENAP-OP-R-2008-884-61 Plymouth Dam

Dear Colonel Tickner:

We are submitting these comments on behalf of the Delaware Riverkeeper and the Delaware Riverkeeper Network, a private, non-profit organization with over 7,000 members throughout the Delaware River Watershed. The Delaware Riverkeeper Network works to protect and restore the Delaware River, its tributaries and habitats through advocacy, enforcement, and citizen action.

The Pennsylvania Department of Environmental Protection (DEP) has proposed:

- 1) Removing the breached remains of Vincent Dam, located 80 feet east of the intersection of SR 4022 and T-304 across the Schuylkill in East Vincent Township, Chester County, and Limerick Township, Montgomery County. The proposal also includes the stabilization of eroded sections of streambank with rock removed from the remains of the dam and the removal of 1,500 cubic yards of material from behind the dam, and
- 2) Removing the breached remains of the 1819 and 1858 Plymouth Dams, located at River Mile 18 of the Schuylkill River in Plymouth Township, Montgomery County. The proposal also includes the stabilization of eroded sections of streambank with rock removed from the remains of the dam

The Delaware Riverkeeper Network strongly supports the DEP's proposal and we urge the Army Corps of Engineers to grant these permits quickly. The breached dams are structurally unsound and cannot be repaired. Their removal would go far toward helping the Schuylkill River to flow freely and restore itself.

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As long as these structures remain, they present safety hazards. Unfortunately, their hazardous condition does not keep people away from them as indicated by comments posted at www.PAFlyFish.com, http://www.paflyfish.com/modules/newbb/viewtopic.php?post_id=44296, "Vincent dam is in very bad shape and is very dangerous.....be very careful if you fish off this dam.....and a reminder that the water surrounding the dam is considered off limits 100 feet below the dam and 200 feet above the dam-----you can fish off the dam legally if it is dry."

Dangers at these dams include fast moving water, open spillways, and thin ice during winter. Deceiving currents at the base of dam spillways can kill swimmers, anglers, paddlers, and other recreational users every year. Even people that understand the dangers of dams can become disoriented and trapped in waters around dams.

Removal of these dams will allow people to enjoy more free-flowing reaches along the Schuylkill River. These dam removals will enhance recreational and aesthetic opportunities in these reaches of the River. Birders and other wildlife watchers will be able to enjoy animals that require healthy, flowing streams and associated habitats to thrive. Anglers will be able to enjoy improved fisheries.

In consideration of potential impacts to the resident and migratory fisheries, we ask the Army Corps to move quickly to grant this permit. Although necessary restrictions to protect the red-bellied turtle require that the dam removal work be done between April and October, we believe that this work should be done as quickly as possible within that window. Issuing the permit well in advance of the April to October time frame will ensure that preparations, plans, contracts and commitments can be put in place to allow work to begin as soon as the biological window allows.

With improvements underway at the Fairmont fishway and fish passage construction underway at Black Rock Dam, Plymouth and Vincent are the only remaining physical barriers blocking the restoration of a migratory fishery to over 100 miles of the Schuylkill River. Their speedy removal could potentially allow American shad to return as far upstream as Hamburg this year, an event not witnessed in nearly 200 years.

The Pennsylvania Fish and Boat Commission (PFBC) has stocked nearly 4.5 million shad fry in the Schuylkill River since 1999. These fry are returning to the Schuylkill as adults. The success of the PFBC stockings is evidenced by a 279% increase in American shad passage from 2004 to 2006, observed by Philadelphia Water Department biologists at the Fairmount Fishway.

Shad fry stocked in the Schuylkill four to six years ago will be looking to return to the River as water temperatures rise to a range of 55 F to 60 F. Water temperature data collected in 2008 in the course of the Limerick Generating Station Water Supply Modification/Wadesville Mine Pool Withdrawal and Streamflow Augmentation Demonstration Projects indicates that, by April, Schuylkill River temperatures are already within the preferred range of American shad and can even exceed the preferred range. This is yet another reason why speedy removal of these dams, beginning on April 1st, is urged. Observation of the removal of the upper and lower Felix Dams has shown that, once a contractor has mobilized, removal of breached timber crib dams can be accomplished in a matter of days.

The benefit of dam removal for both resident and migratory fish populations will also translate into economic benefits. PFBC has projected that the return of shad to the Schuylkill River could bring as much as \$ 4 million annually to the watershed from angler trips alone. A study, cited in Small Dam Removal: A Review of Potential Economic Benefits (Trout Unlimited, 2001) presents the estimated median net economic values per recreation by day by type of activity. Migratory fishing resulted in a median value of \$67.81 Coldwater fishing resulted in a value of \$41.78.

Removal of these structures will also potentially enhance economic benefits resulting from unpowered and low-powered boating. With a free-flowing river, the fast growing sport of kayaking - and kayak fishing - will likely flourish, especially with the Schuylkill River Water Trail now designated as a National Recreational Trail. The water trail guide that is now available advises caution at both dams with a special warning that at Plymouth remaining timbers represent a major hazard. Removal of these dams will mean the removal of two hazards along a water trail with a national profile.

Both Vincent and Plymouth, despite being breached, do continue to impound water, thereby reducing the Schuylkill's flood-storage capacity in their respective reaches. As with all dams, the presence of these structures, even in their current condition, affects water quality, negatively changing water temperature, dissolved oxygen content and turbidity. They are also affecting the River's ability to move sediments and other nutrients downstream.

The Pennsylvania Historic & Museum Commission's Bureau for Historic Preservation has indicated that the removal of these dams will adversely affect the National Register eligible Schuylkill River Canal Navigation System. However, under the Memorandum of Agreement negotiated for the removal of Felix Dam, the DEP has already studied the history of the entire Schuylkill River Canal Navigation System including both Vincent and Plymouth Dams. Therefore, photo documentation should be sufficient mitigation for both removals. That these removals will also facilitate the restoration of an historic migratory fishery should also be factored when considering mitigation, particularly in light of the role that fishery played in the region's early settlement.

In conclusion, the Delaware Riverkeeper Network strongly supports the DEP's proposals to remove Vincent and Plymouth Dams. We urge the Army Corps to move quickly to grant these permits. Thank you for the opportunity to comment on these proposals. Should you have any questions, please don't hesitate to contact us at 215-369-1188.

Sincerely,

Maya K. van Rossum,
the Delaware Riverkeeper

Chari Towne
Schuylkill Watershed Specialist

