



February 11, 2009

Linda Burlington
NOAA Office of General Counsel for Natural Resources
Room 15107
1315 East-West Highway,
Silver Spring, Maryland 20910

Re: Draft DARP and Environmental Assessment for Athos I Oil Spill

Dear Ms. Burlington:

American Rivers is writing in support of the Darby Creek dam removals and habitat restoration project proposed as part of the restoration plan for the Athos I Oil Spill in the Draft DARP dated January 2009. American Rivers is a national non-profit river conservation organization dedicated to the protection, restoration and enjoyment of America's rivers. We are considered a national leader in the effort to promote dam removal as a cost-effective, safe, and powerful tool to restore the dynamic function of rivers for the benefit of aquatic and human communities. We are also managing the Darby Creek dam removals and habitat restoration project.

American Rivers supports the selection of the Darby Creek dam removals and habitat restoration project as an effective means to advance aquatic ecosystem recovery in this tributary to the Delaware Estuary. This project will address 3 dams and an abandoned bridge pier that have contributed to degraded aquatic and riparian habitat conditions and aquatic ecosystem fragmentation in lower Darby Creek. The project will also benefit Delaware County and its communities by removing structures which are themselves liabilities to the communities and which have contributed to localized flooding at these 4 locations. The removal of these structures will allow for the creation and maintenance of riverine habitat in areas that are currently impounded or degraded and will restore access to this tributary which historically supported anadromous fish.

This multiple-barrier project has been designed using qualified river restoration engineers and will be constructed using contractors with extensive dam removal experience. The combination of these experts' skills with American Rivers' management will yield a project that maximizes the restorative power of the dam removal activity while minimizing the short-term impacts of demolishing these structures. American Rivers has been involved in over 50 dam removals in the Commonwealth of Pennsylvania and has an established track record of restoring natural rivers in former dam and impoundment locations.

Removing outdated, unnecessary dams is a responsible approach to aging infrastructure and creates an opportunity for communities to reconnect with their watersheds and to



restore ecological services such as floodplain and channel storage, aquatic ecosystem nutrient processing, and wetland infiltration and filtering. In the face of a changing climate, it is critically important to seize all opportunities to restore resilience and function to freshwater systems, particularly along America's populated coasts. American Rivers strongly supports the removal of unnecessary dams and applauds the Trustees' selection of the Darby Creek dam removal and habitat restoration project.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Sara Strassman". The signature is fluid and cursive, with the first letters of "Sara" and "Strassman" being capitalized and prominent.

Sara Strassman
Associate Director, River Restoration Program

Cc: R. Scott Carney, Pennsylvania Fish and Boat Commission (digital)