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December 12, 2008

## **Army Corps of Engineers – Francis E Walter - Lehigh River Recreational Enhancement Study Comments**

The following comments are submitted by the Lehigh Coldwater Fishery Alliance (LCFA) regarding the Section 22, Lehigh River Recreational Enhancement Study.

On July 13, 2005, LCFA officers met with Army Corps of Engineer representatives to discuss a way of bringing the Lehigh River Recreational Enhancement Study (the “Study”) to fruition. It was during this meeting where the Study’s goals were outlined. Our interpretations of the Study’s goals are as follows:

- 1) Determine how much water can be safely stored in the Francis E Walter (FEW) reservoir;
- 2) How to maintain a release of coldwater (55 F +/-) from FEW and eliminate the depletion of the coldwater pool;
- 3) Determine what releases will obtain trout conducive temps (below 68 F) at various locations downriver from FEW, and;
- 4) Determine a balance between whitewater releases and conservation releases for the aquatic ecosystem and fishery.

It is now our understanding that the discussion in bullet #1 above will require a separate study. This secondary study will make the necessary determinations required to increase the height of the pool in FEW. In addition, congressional authorization or re-authorization will likely be required once the additional study is completed.

The performance and data collected from this ongoing Study are very important in paving the way for future improvements to the Lehigh’s wild trout fishery. Information regarding water releases for the Lehigh’s whitewater industry is an already known component. However, what is unknown is how whitewater releases affect the wild trout fishery, coldwater pool in FEW, and how to maintain coldwater releases that are vital to a healthy wild trout fishery.

A crucial component of this Study is the performance of a model run that will provide data exclusively for the fishery (“a fisheries only scenario”) to determine the potential of FEW, if it were only utilized for sustaining the trout fishery. The data collected from this type of model run will determine one end of the “spectrum.” It is also imperative the other model runs and scenarios for the Study are not limited or bound in scope, since this will prohibit collection of the best available information to formulate conclusions and make science-based decisions that will improve the Lehigh’s aquatic ecosystem and recreational opportunities.



Some of the potential benefits of implementing findings of the Study are, but not limited to:

- Increase in overall regional tourism,
- Increase in out of state fishing license sales,
- Increase in fishing guide permits (DCNR & PFBC),
- Potential recognition for a world class wild trout fishery (PFBC Class A designation),
- Less in-lake fluctuation, improvement of lake fishery and In-lake boating opportunities,
- Higher minimum flows below FEW, thus improving the boating experience during non whitewater release periods,
- Guaranteed “X” number of whitewater releases (to be determined),
- Dilution of AMD, sewage effluent and, improvement to the overall aquatic ecosystem of the Lehigh.

In closing, on behalf of the LCFA, I want to thank all the agencies for their cooperation and hard work in the performance of the Study and the overall willingness to work towards the preservation, protection, and enhancement of the water resources of the Lehigh River.

Sincerely,

Dean Druckenmiller, President  
Lehigh Coldwater Fishery Alliance  
[www.thelehighriver.com](http://www.thelehighriver.com)

cc: Senator Arlen Specter  
Congressman Charlie Dent  
PA Congressman Keith McCall  
PA Congressman Robert Godshall  
Chris Kocher, President – Wildlands Conservancy

[EMAIL, December 15, 2008]

TO: USACE  
FROM: Lehigh River Outfitters Association  
RE: Comment on Proposed Lehigh Flow Study

At the recent public meeting on November 18, a series of ten flow models (5 pairs of models) were presented for possible inclusion in the Lehigh River Water Quality Flow Study that's about to be undertaken. Scenarios A & B have apparently already been approved for the study, and public input has been requested regarding which of the remaining 8 scenarios, or versions thereof, (C through J) should be selected.

With respect to the model that includes ramping (scenarios E & F) it would seem prudent, in the absence of any specific Lehigh River studies to the contrary, to select a ramping plan that more realistically mirrors the ramping plans associated with whitewater release programs on countless other rivers around the country. These typically involve ramp-down schedules in which flows drop immediately to the river's inflection point (defined as the "critical flow" at which the vast majority of the streambed substrate remains covered by flowing water), and then ramp down over a period of several hours to the target base flow. Examples of this are the Savage River (Maryland), and the Cheoah River (North Carolina), where studies to evaluate stranding and ramping determined that whitewater release flows of 1000 cfs should drop to 100 cfs (the river's inflection point) in one step, and then ramp down to the base flow of 50 cfs in several additional steps.

Given the finite amount of cold water available at FE Walter, and given the keen desire to preserve that water for summer flow augmentations, it doesn't seem appropriate to study a ramping proposal that appears to be so unnecessarily consumptive of cold water and that so severely jeopardizes FE Walter's mandated project purpose of enhancing downstream recreation.

Based the above, it would be our strong recommendation that scenarios E and F should be modified so that the ramp-down schedule is more realistic. Our suggestion would be that until there is Lehigh-specific data to suggest what that model should look like, our best guidance comes from studies performed on other rivers of similar gradient, similar shoreline characteristics, similar base flows and similar release flows. On that basis, the model to be studied should be one in which the Lehigh whitewater release flow drops in one step to a realistically presumed critical flow of approximately 300 cfs (the level at which the vast majority of the streambed substrate remains covered by flowing water), and then drops in stages, over a period of several hours to the base flow, which ordinarily ranges between 100 to 300 cfs, depending on time of year.

This model realistically addresses concerns about the potential for stranding of fish and other potential impacts, while preserving a vast amount of additional cold water for use during July and August, when it is most needed.

Also, with limited funding available for a limited set of potential scenarios, it strikes us as wasteful to choose a model that either includes no whitewater releases (scenarios G & H) or a model that includes no fisheries augmentations (scenarios I and J). Let's focus instead on realistic alternatives that will prove useful in guiding real-life decisions that need to be made at the conclusion of this study. With that in mind, we recommend that the flow models include Scenarios A & B, C & D, and E & F (as modified above), and exclude Scenarios G & H, and I & J.

Respectfully submitted,

Lehigh River Outfitters Association  
Jim Thorpe River Adventures, Jerry McAward  
Pocono Whitewater, Doug Fogal  
Whitewater Challengers, Ken Powley  
Whitewater Rafting Adventures, Joe Flyzik

[EMAIL, January 25, 2009]

TO: USACE

FROM: Rick and Jill Brown, Canoe Club of Greater Harrisburg (CCGH)

RE: Proposed Water Quality/Flow Model Study

I wanted to take the opportunity to express my opinions on the proposed study and to thank you for the great, and many times thankless job you all do in managing the Lehigh River water resource to provide the fishing and boating community a fantastic recreational venue.

If there is a decision to be made on eliminating any of the proposed studies due to a limit on the number of studies allowed I have the following comments:

Of the proposed study models I think the least useful would be the study of the whitewater only releases. I don't think this is a viable option. I think that everyone concerned, including the boating community would agree that water quality and the health of the aquatic life is a priority and to limit the releases to the benefit of just one group, in this case the boating concerns, would be an unacceptable option.

The second least useful study would be the fishing augmentation only study although I understand that this study may be needed to get baseline data. However as an end result I don't think that this is a viable solution since it excludes the boating communities concerns.

In closing I would again like to thank you for managing this valued resource and praise your efforts to provide the boating community with consistent ww releases during the year. My wife and I (as well and many of our friends and countless others from the greater surrounding boating areas) spend time in the Lehigh Valley every ww release weekend due to the fantastic boating opportunity afforded to us thru these regular and consistent dam releases USACE manages.

Respectfully,  
Rick Brown



# Tom Wilkins, F.F.S.

70 Falmouth Road, Hamilton, NJ 08620-1550

(609) 585-6233

[canoecop@verizon.net](mailto:canoecop@verizon.net)



February 4, 2009

Mr. Ed Voigt  
Chief, Public & Legislative Affairs  
Philadelphia District  
U.S. Army Corps of Engineers  
Wanamaker Building  
100 Penn Square East  
Philadelphia, PA 19107-3390

Dear Mr. Voigt,

I am sorry that I missed the meeting on January 21, 2009, that you conducted in White Haven, Pa. I understand the meeting went well and was very informative. I was unable to get off from work and it was not possible to make it in time. I just wanted you to know how much the Lehigh River releases mean to the paddling community.

Although I enjoy the releases from the Francis C. Walter Dam, I fully realize that its primary purpose is flood control. The scars from earlier floods can still be seen along the Lehigh and debris is still present. I started paddling the Lehigh River about 20 years ago, first as a recreational rafter then as a canoeist and finally in a kayak. Although it is a two hour drive, I find the exercise, excitement and camaraderie to be worth the entire day. Afterwards we usually go out for dinner. Many of us camp and shop in the area.

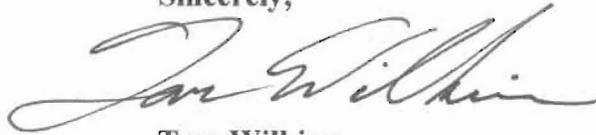
As a paddler I can understand the concerns of the fishermen. When we paddle any river we make an effort to avoid them and their lines. Most of us avoid the trout streams entirely during the first weeks of trout season. However, I am at a loss as to why they want to curtail the releases from the dam. Over the past few years, I have made it a point to pay attention to the number of fishermen along the river bank. Rarely do I count more than five and very often they are not present at all. Because of errors on my part, I have paddled the river on days without a release and their numbers did not increase; I am at a loss to understand why the few who do use the river for fishing would be so determined to stop us from paddling. I am hoping that after discussion an equitable decision can be reached.

We Shall Never Forget

**I understand there will be another meeting in September to discuss next years plans. I would appreciate as much lead time as possible so I can make arrangements to attend. It is a long drive and it will be necessary for me to take time off from work to attend.**

**I would like to thank the Army Corps of Engineers for maintaining the Francis C. Walter Dam. And I would like to say, "Thank you" for your attention and keeping the meetings public. If you have any questions or comments, please do not hesitate to contact me. My daytime phone number is 609-989-6822 and my email is [twilkins@mercercounty.org](mailto:twilkins@mercercounty.org).**

**Sincerely,**

A handwritten signature in cursive script that reads "Tom Wilkins". The signature is written in black ink and is positioned below the word "Sincerely,".

**Tom Wilkins**



## ***Kayak and Canoe Club of New York***

Susan R. Anderson  
USACE  
Philadelphia District

RE: Comments of Francis E. Walter Dam Recreational Release Plan 2008 and 2009

First, thank you from the Whitewater paddling community for the previous whitewater release seasons. This has been a real positive for whitewater recreation. The whitewater releases have been increasingly popular with private boaters and whitewater rafters every year. It is especially helpful to know in advance that the water levels are suitable for boating. This allows us to schedule club trips and instructionals on the Lehigh river. Every release, KCCNY has boats on the Lehigh along with many of the other local clubs such as the NY AMC, Lehigh Valley Canoe Club, Philadelphia Canoe Club and the Wilmington Trail Club. We also see private boaters from this region as well as license plates from surrounding states such as Maryland, Massachusetts and Virginia. The combined membership of the local clubs is over 1000 boaters. We all appreciate the boating opportunities on the Lehigh River, especially in the summer months when there are no natural flow rivers available.

We realize that the flow management plan has to satisfy many groups, sometimes with opposing interests. It is obvious that you are trying to find a balance between these groups and provide adequate opportunities for all. This effort was evident in 2008 when we had months of little to no rainfall, and yet the releases were able to go on as scheduled. THANK YOU!

We also greatly appreciate your posting of the proposed release levels as early as possible in the week so that we can plan last minute trips. This has been a big help to the many clubs who schedule trips on the Lehigh River.

The 2009 recreational release schedule continues in a similar manner. We all hope that we will get some rain so that the September and October releases take place.

I am personally a regular user of the Lehigh river for whitewater recreation as a KCCNY trip coordinator and an ACA certified whitewater kayak instructor. Based on my experience, I would like to offer additional suggestions for enhancement of the flow schedule, rainfall permitting.

1. Give priority for additional releases to the mid-October weekend release. This is the peak of the fall foliage season and a unique and special opportunity to enjoy the natural beauty of the Lehigh Gorge. As this opportunity occurs only once per year, we would like to see this one take place over the earlier October or late Sept releases if there is not enough water.
2. When there is sufficient rainfall and water available, raise the release level to 1000-1200cfs. The 750 cfs level is the minimum boatable level for the upper gorge (Whitehaven) but is not



## ***Kayak and Canoe Club of New York***

sufficient for the lower gorge (Rockport to Glen Onoko). This creates a crowding situation on the upper gorge, both on the river and in the parking areas. Sufficient flow for the Rockport section spreads out the crowds and allows us to enjoy this beautiful section of the Lehigh river more often. Our experience has shown that there is no difference in safety between the 750 level and 1200 cfs, but it does make the lower section much more enjoyable.

3. Maintain a minimum release of 750 cfs from the dam for whitewater releases. Any flow less than this is noticeable to a boater and makes for a much less enjoyable trip. A shorter day with an earlier cut-off would be preferable to a lower water level. Currently the 2009 schedule calls for a minimum of 700 cfs during July and August if the water level is too low.

Ellen Moskowitz

Treasurer: KCCNY

ACA Whitewater Certified Kayak Instructor

12 Maple Lane  
New Milford, CT 06776  
January 18, 2009

US Army Corps of Engineers  
Wanamaker Bldg.  
100 Penn Square East  
Philadelphia PA 19107-3390  
Attention: Mr. Ed Voigt  
Public Affairs

To All concerned, Fishermen, Lawyers, Scientists, Kayakers and Rafters,

How saddened I was to hear of the upcoming meeting to discuss changes to the FEW dam program on the Lehigh River. As a paddler I spent most of last summer running the Lehigh. The sharing with the fishing community that has been in effect for some time seems to be working quite well. However, now the fishermen have gotten lawyers and scientists on board to propose changes in the name of "science". They want to reduce the release flows and the releases in the "name of science" which would only be to their benefit and to the vast reduction of the kayaking and rafting community.

I started paddling only five years ago, and whitewater running only two years ago. I have found a sport that is healthy, exhilarating, and quite social. Also, it's better on my knees than hiking and running. It's a wonderful sport. It gets people outdoors. I see parents out with their children on raft trips; teenagers spending a day outdoors with friends, instead of hanging out at the mall, playing video games, or spending the day texting. In line with our society's desire for "No Child Left Inside" and the council on obesity, river sports are a perfect way to accomplish these goals. Get outside, burn calories, exercise you heart. The fishing community wants to take that away.

Another benefit of the paddling community is the revenue and tourism they bring to the area. On any given weekend there are hundreds of paddlers and probably 600 to 800 rafters who bring income to outfitters, spend money at restaurants, buy gas and stay at hotels in the area. All these items bring revenue to the state because they are taxable, with the high volume of paddle tourists contributing those taxes. The fishing alliances say that their cause would bring tourism. This is true, but tourism is already there. Paddlers for the most part support the LNT initiative. We put in at ramps and parks, cut no trails and take out at ramps and parks. We take out all our trash and usually pick up cans, plastic and torn fishing line that gets left behind. We are quite eco-friendly.

The current setup seems to allow the FEW dam releases on alternate weekends. This seems like an equitable sharing, since the fishermen can still fish on the release weekends and also have the no release weekends and all week to themselves. They want to reduce the flow release to 650cfs. Anyone who has paddled the Lehigh knows that 750 is really the minimum to enjoy the river and have a safe run. I have paddled it at 900 cfs and that's a WOW run for me. And at the occasional 1200 cfs, it's a spectacular thrill. But we seem to be happy to have the usual 750. If the cfs are reduced, the paddling community loses and the fishing community gains all. That does not seem to be a fair compromise.

Please consider letters such as mine when this meeting occurs and in the future when it comes time to make the decisions about the river. I have neither scientists to represent me, nor lawyers to defend my proposal. I speak as an outdoor enthusiast, a kayaker and someone who loves to run rivers. But the rivers have to be available so I can get into my boat and run.

SYOTR(See you on the river),



Jo-Ann Durdock