



## **Forks of the Delaware Chapter #482 of Trout Unlimited**

### **Re: 2008 Francis E. Walter Flow Management Plan Review and 2009 Planning Comments**

To all concerned agencies,

The Forks of the Delaware Chapter of Trout Unlimited is an organization dedicated to protecting, conserving, and restoring the coldwater resources of our region. Our chapter represents more than 180 local anglers and trout conservationists.

Our chapter recognizes the importance of protecting the growing trout population of the Lehigh River and this exciting fishery's potential for providing increased local economic development opportunities. The recreational resources and economic opportunities of the Lehigh River extend beyond whitewater rafting and we believe strongly in a flow plan that supports the diversity of these resources and opportunities. In doing so we support a better balance to the current management of the whitewater and fishery releases that will allow for the Lehigh's trout population to thrive while continuing to maintain the economic strength of the whitewater enterprises. We do not feel this was achieved under the 2008 Flow Plan.

Therefore, the Forks of the Delaware Chapter of Trout Unlimited strongly supports the 2009 FEW Flow Plan recommendations of the Pennsylvania Fish and Boat Commission and the Lehigh Coldwater Fishery Alliance.

We respectfully submit our comments here for the official record.

Sincerely,

Ryan Rush, president  
Forks of the Delaware Chapter #482 of Trout Unlimited  
PO Box 467  
Stockertown, PA 18083



November 19, 2008

Dear FEW Stakeholders,

I fully support the recommendations of the Lehigh Coldwater Fishery Alliance and Lehigh Trout Work Group including the following:

- Front end-load fisheries augmentation. It is in the best interest of the fishery to increase the summer fisheries augmentation when it is most needed, and hope that rains occur to extend the augmentation into September.
- A 1365' start, allows for a +100cfs augmentation through July 29. Consensus is that more water even at a higher temperature is better, then less water.
- A 1370' start, allows for a +100cfs augmentation through August 28. Obviously, this is the preferred scenario.
- Both scenarios allow for guaranteed whitewater releases through the first event in September. Whitewater releases will be precipitation dependent after that 1<sup>st</sup> weekend in Sept.
- Decrease in quantity of whitewater release volume if the pool level at the start of July is at 1365ft.
- As the season progresses there should be an *even* allocation between fisheries augmentation and whitewater releases when precipitation allows. One week of fisheries augmentation for each whitewater release when precipitation allows.

Every effort should be made to close the thermal gap in mid to late summer. The question "how much water is needed for a quality whitewater experience" should be addressed. With less water, it is my understanding that the rafting companies can still run trips further downriver.

Thanks,

Brian Wagner  
Northeast Regional Vice-president  
Pennsylvania State Council  
Trout Unlimited



**November 28, 2008**

**Army Corps of Engineers and Other Stake Holders**

**Subject: Comments on 2009 FEW Flow Plan**

Dear Sirs:

On behalf of the Lehigh River Stocking Association (LRSA), the writer would like to thank the Army Corps and the operators at the FEW dam for their efforts at helping to balance the needs of the fishing and boating public. In general, the LRSA would like to see flow management prevent low flow conditions during the year. It is the low flow conditions that have the greatest potential for stressing the fishery.

In summary, the LRSA is strongly advocating for release regimes that have the following characteristics:

1. Avoid minimum flows, request increase of the minimum augmentation flow to 100 CFS during June through August and to achieve this through reduction in the maximum flows used in the white water releases
2. Maintain 400 CFS minimum flow if possible in summer through August
3. Limit augmentation to a maximum of 400 CFS in April and May
4. Attempt to taper the down at the end of the white water releases
5. Attempt to stabilize flows on off white water weekends to make angling possible for the wading public
6. Eliminate the Mothers Day release entirely and target 500 CFS augmentation
7. In future years, include anglers in meetings where the white water release dates are established (this was not the case during the 2009 plan development).
8. We subscribe to the flow regime Mark Hartle of PFBC has described with front loaded releases that among other things, extends more substantial minimum flows through the summer months.
9. It is understood that white water outfitters find that 1200 CFS provides optimal water and that 650 is a minimal flow. However, LRSA encourages more compromise on the upper flow numbers so that the water is there to meet the needs of the fishery. It was mentioned that approximately 50 CFS for 13 days is equivalent to two ½ days at 650 CFS. It is important to work through these numbers to get more water during low water periods for angling and trimming the top end off the rafting optimum. This compromise is necessary to get the fair balance between the needs of the anglers (and river ecosystem) and the boating which NRDC claims to be seeking.
10. Incidentally, the LRSA also supports adherence to the current 5 foot variation rule in the reservoir to protect spawning areas there.

The writer would like to take this opportunity to point out that the LRSA is the largest private fish stocking enterprise stocking legal sized hatchery raised trout into the Lehigh River Sections 7 and 8 (Glen Onoko to Northampton below Cementon Dam). The LRSA is a 501C3 non-profit that relies on financial donations to pay for the trout that are introduced to the river. While there are reports of an emerging wild trout population in the Lehigh main stem, and the PFBC has recently begun introduction of fingerling trout in section 7, the vast majority of legal sized trout are the result of the financial contributions from LRSA sponsors. Anglers (and particularly commercial guided angling businesses) who enjoy the trout fishing in Section 7 and 8 or who would

Lehigh River Stocking Association, Inc.  
PO Box 54  
Walnutport, PA 18088  
www.LRSA.org



otherwise like to contribute to the vitality of this trout stocked fishery, are encouraged to financially support the LRSA.

Through LRSA water quality monitoring programs in Jim Thorpe, we see that the white water releases cause the depth of the river to rise about 1 foot within 1 hour. The end of the release was observed to either drop by 1 foot within 1 hour or in some cases the flow was stepped down in smaller increments. It is unclear what if any deleterious impacts this rapid rise and decline of the river have on the fishery. However it is assumed that because the rapid decline is like nothing seen in the natural world, it is likely that there are some negative impacts. Therefore some believe that tapering the flow after a release is better for the fishery, although this does consume water that might otherwise be available to augment during low flow conditions. The LRSA would like to see tapering where possible but not if it would jeopardize augmentation goals as previously stated. It is also observed that the water level begins to rise at Jim Thorpe at 12 noon and begins to fall at midnight. This corresponds to the FEW release plan of releasing at 1 a.m. until 1 p.m.. Therefore the travel time for the water pulse to get from FEW to Jim Thorpe appears to be ~ 11 hours.

The LRSA water quality monitoring program has also observed that the river dissolved solids are flushed during white water events. The specific conductance drops during white water events and then it re-establishes after the event to previous levels. It is not clear what if any impact (plus or minus) this has on the fishery but the writer's judgment is that this is flushing of dissolved solids is likely to be beneficial. However, we also observe a rise in turbidity due to flushing of suspended solids. At times, the flushing of large masses of algae make angling very difficult due to accumulation of this flushed algae on monofilament fishing line, which of course has negative impact on angling. Generally speaking, turbid water conditions are not conducive to good fishing. These relationships are illustrated in the figures below.

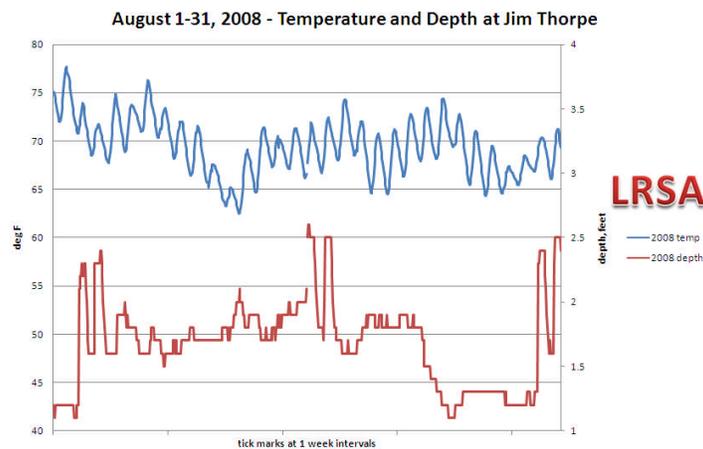
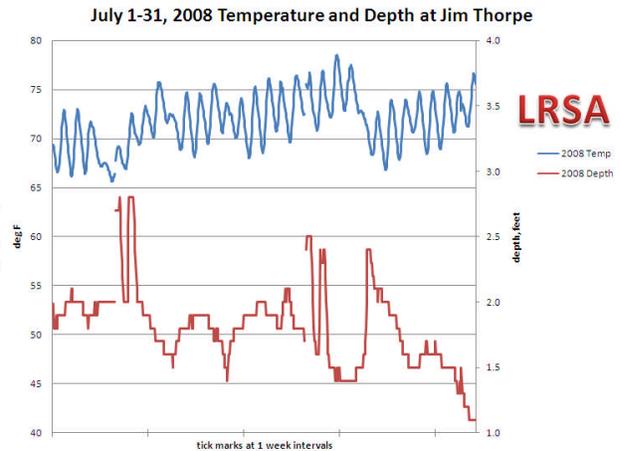
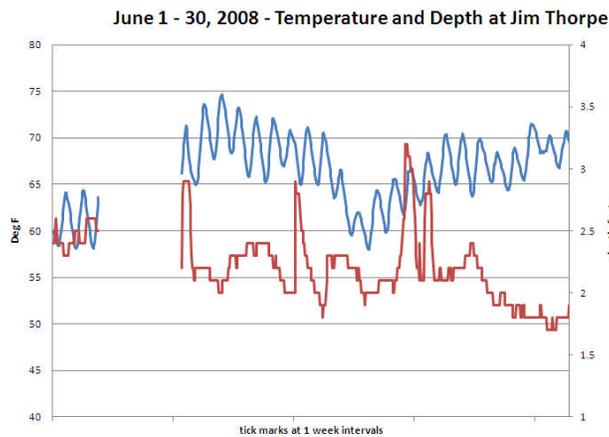
The LRSA is committed to the restoration of the trout fishery in the Lehigh River sections 7 and 8. For the most part, the trout stocked fishery has been restored thanks to our efforts over the last 15 years. Over the last 2 years we are pleased to acknowledge that the PA Fish and Boat is also adding a good number of trout fingerlings into these sections of the river. We are hopeful that this program will be continued and are collaborating with Dave Arnold, Daryl Pierce and others at the PFBC in this effort.

During the last three years the LRSA has run a dedicated water quality monitoring program in Jim Thorpe between the months of March and September. This program has enabled LRSA to contribute to the data base of scientific measurements that help in the understanding of this resource. The LRSA is currently working on a project that will stream this water quality data onto the worldwide web for wide public accessibility. Those who are interested in receiving log-on instructions for this data are encouraged to contact the writer.

A series of graphs are provided below that illustrate some of the water quality measurements that have been taken in Jim Thorpe over the last 3 years. The FEW Flow management plan has a direct effect on several parameters measured and some of these are discussed below. There is great interest in the river temperature at Jim Thorpe as part of the Phase 1 flow study and LRSA has collaborated with Greg Wascik at ACE to share this data. A series of figures below illustrate temperature profiles in conjunction with river depth (which lag the FEW release events by 11 hours and where depth changes are proportional to FEW volumetric flow releases).



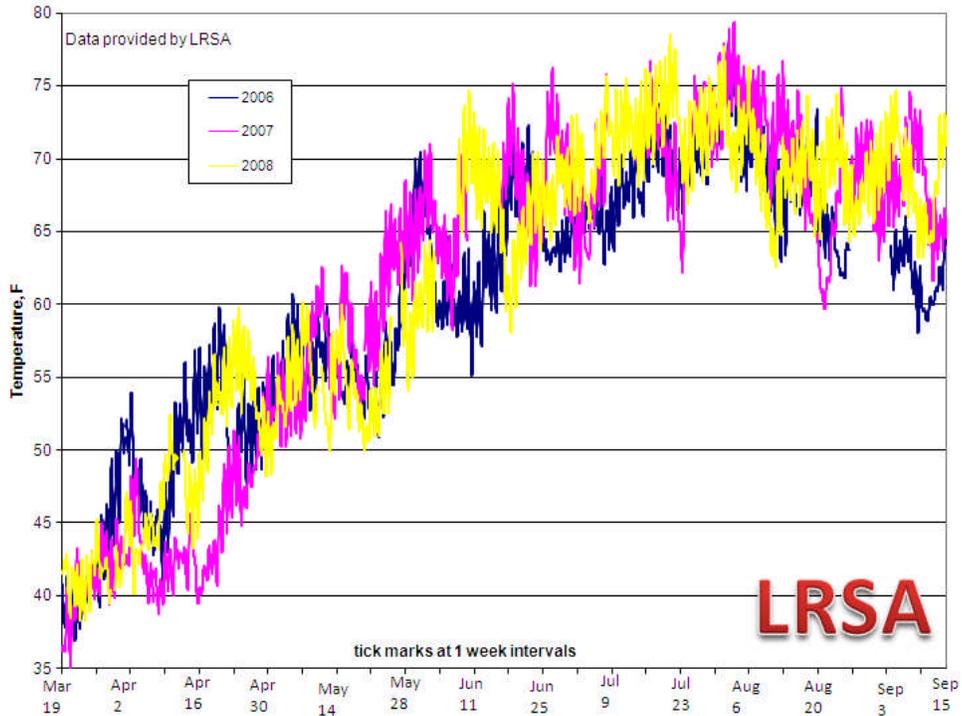
The three figures depict the profile of river depth and river temperature at Jim Thorpe (approximately 0.5 mile upstream of the Rt. 903 Bridge).



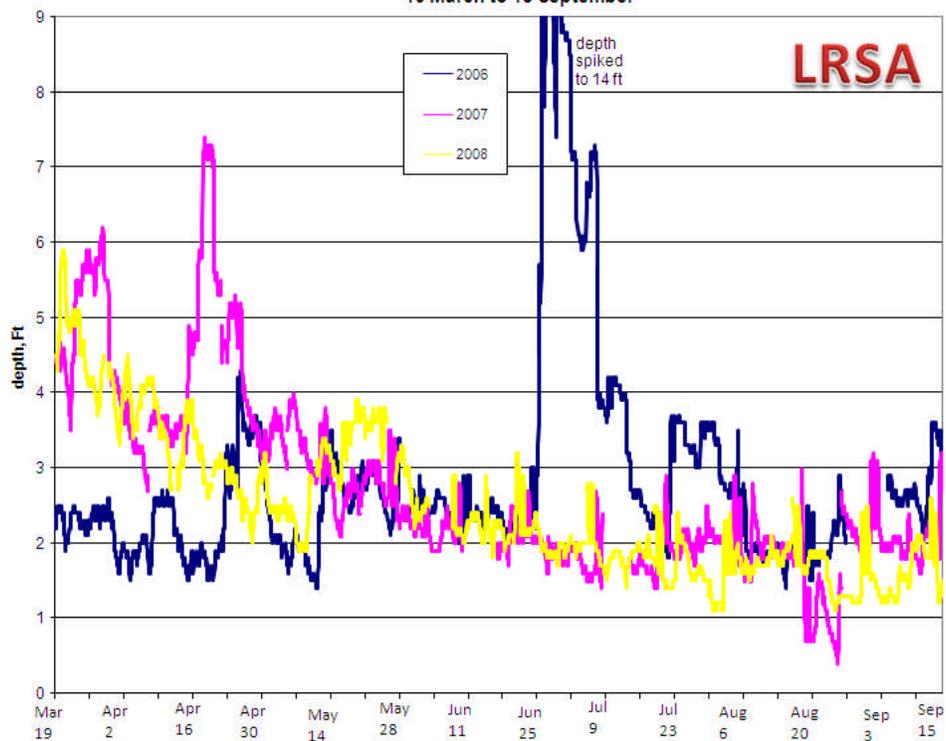
The figures below show the temperature profile and the depth of the river at Jim Thorpe over the last three years between March and September. There are no significant differences in the water temperature. Depth however does appear to be lower on average in 2008. LRSA would like to avoid low level conditions.



Lehigh River @ Jim Thorpe - Year to Year Comparison 2006, 2007 and 2008  
19 March to 15 September



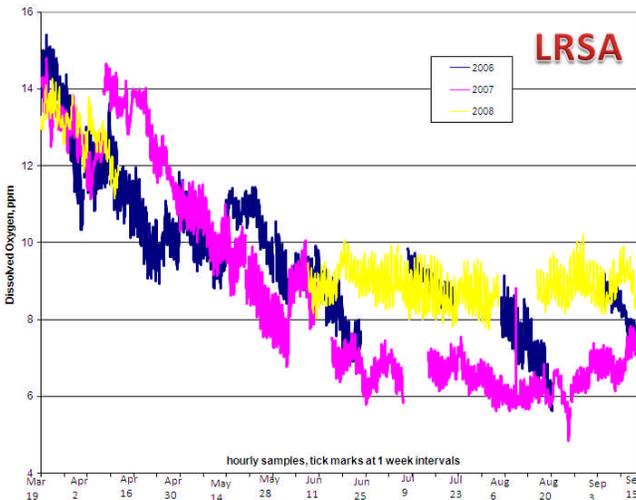
Lehigh River at Jim Thorpe 2006, 2007 and 2008 Comparison - Depth  
19 March to 15 September



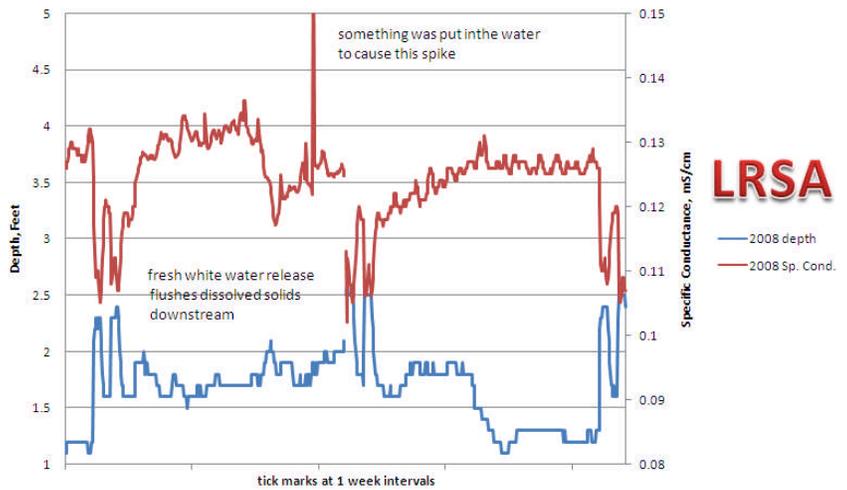


Dissolved oxygen conditions remained well within a healthy range for the trout fishery in 2008. Specific conductance (a measure of dissolved solids) is also illustrated below for August 2008 and clearly show that the white water releases lowering the dissolved solids in the river, this is assumed to be a benefit of the white water releases.

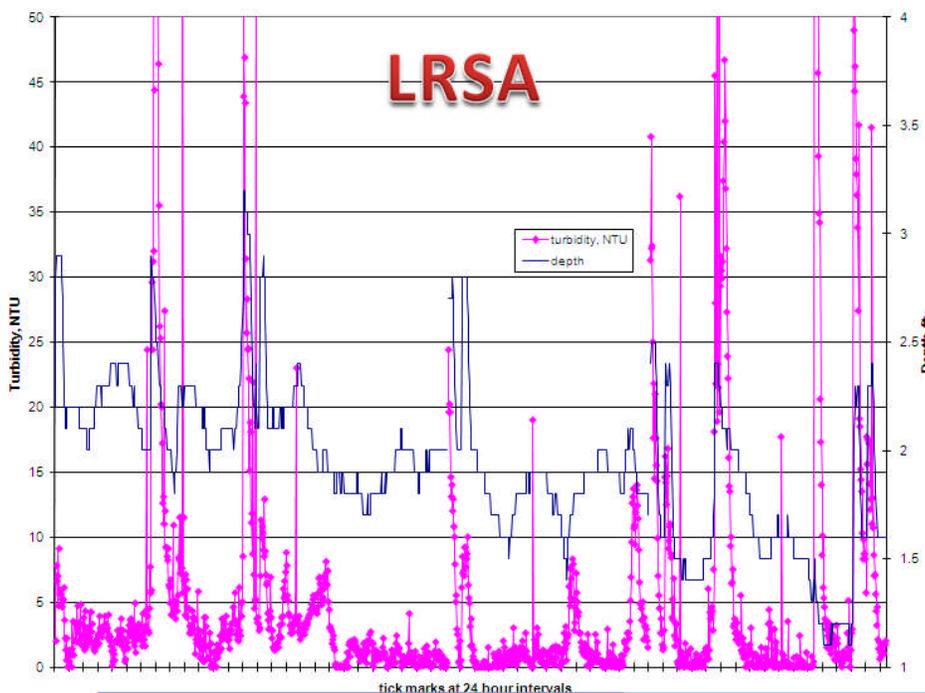
Lehigh River at Jim Thorpe 2006, 2007 and 2008 Comparison - Dissolved Oxygen  
 19 March to 15 September



August 1-31, 2008 - Specific Conductance and Depth at Jim Thorpe



Lehigh River WQ at Jim Thorpe | Start June 8th @ at 11am to August 4, 2008



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[www.LRSA.org](http://www.LRSA.org)



The LRSA welcomes continued collaboration with Army Corps, PA Fish and Boat, Wildlands Conservancy, LCFA, TU, NRDC, Guided River Fishing Companies and other fishery stake holders in our efforts to balance the needs of the angling public, the health of the trout stocked fishery and emerging wild trout populations with those of the White Water Rafting and Kayaking commercial enterprises. If there are any specific experiments that LRSA could assist with in terms of water quality parameter monitoring or in terms of manpower needed on the river, please let us know. In the mean time, LRSA we will continue to expand both our trout stocking and river conservation programs. We look forward to the results from the 6 pre-determined model scenarios associated with the Phase 1 study and also look forward to the public forum on January 21<sup>st</sup>, 2009.

Sincerely,

Matt MacConnell, P.E.  
President, Lehigh River Stocking Association, Inc.  
[www.LRSA.org](http://www.LRSA.org)  
[neobium1@ptd.net](mailto:neobium1@ptd.net)  
610-657-2707

[EMAIL, December 1, 2008]

**TO:** USACE  
**FROM:** Lehigh River Outfitters Association  
**RE:** Suggestions for 2009 F.E. Walter Flow Management Plan

Thanks for the opportunity to provide input for the 2009 Flow Management Plan at FEWalter Reservoir. The following suggestions are submitted by the Lehigh River Outfitters Association:

**Suggestion #1:** What to do if not enough water is stored by May 9.

We haven't had to contend with this scenario yet, but it is certain to happen sooner or later ... a snowless winter followed by a dry spring season. Suggested language for future "water plans" follows:

*"On very rare occasion, an extended period of below normal precipitation between January and April may make it difficult to accumulate enough water at FEWalter to reach the desired pool elevation of 1370 by the established target date in early May. In such a case, implementation of the 5-foot pool fluctuation criteria will be suspended until and unless pool elevation of 1370 is achieved prior to July 1. During the May-June period, any rain event that increases flows into FEWalter above the adjusted target flows defined below will be used to store additional water in anticipation of summer releases for both fisheries augmentation and whitewater events, with the added benefit of not "flushing" cold water reserves at the bottom of the pool earlier than is necessary.*

*"In order to help preserve the existing accumulation of water at FEWalter, whitewater events and weekday flows will be scaled back so that the target flow for whitewater events will be 600 cfs rather than 800 cfs in May; the target flow for whitewater events will be 600 cfs rather than 750 cfs in June; and weekday flows will be 150 cfs rather than 200 cfs during the May-June period. This reduction in flow targets during May and June, resulting from lower than anticipated storage during this period, will remain in effect until or unless a pool elevation of 1370 is achieved prior to June 30."*

**Suggestion #2:** Modify slightly the flow targets on non-release October weekends.

The intent of establishing a maximum flow target on October non-whitewater weekends is to ensure a reasonable flow for anglers on those weekends ... not necessarily to exclude boating as a viable recreational opportunity. Increasing the target flow ever-so-slightly on non-event October weekends (from 400 cfs to 450-500 cfs) would result in a still modest flow that would remain attractive to anglers, while barely covering the mid-channel rocks that would permit passage by rafts and drift-boat fishing groups. Therefore, we suggest a change of the 400 cfs flow target flow on non-event October weekends to 450-500 cfs.

**Suggestion #3:** Revise slightly the summer release targets:

We've been reminded in recent years that a 750 cfs whitewater release in August differs substantially from a 750 cfs release in June, due to the declining flows associated with downstream tributaries.

Therefore, a slightly higher target release is needed in August to produce the same quality trip as a 750 cfs release in June. This can be accomplished by reassigning the water allocated to the last "scheduled" Sunday release in September, and applying that water to slightly higher release targets for July and August. Suggested flow targets for 2009 are:

- 750 cfs June
- Inflow plus 700 cfs in July (up to a maximum of 800 cfs)
- Inflow plus 750 cfs in August (up to a maximum of 850 cfs)

Slightly higher whitewater flow targets in July and August will be achieved by "borrowing" water assigned to the last "scheduled" Sunday whitewater release in September, leaving 5 "planned" whitewater days at the end of the season rather than 4. These dates will be added to the schedule as "scheduled" events only when and if sufficient rainfall after July 1 provides enough storage to support them, according to the following sequence:

- First, add the Sunday from which water has been “borrowed” to enhance whitewater releases in July and August.
- Second, add the next to the last Saturday date.
- Third, add the last Saturday date.
- Fourth, add the next to the last Sunday date.
- Fifth, add the last Sunday date.

**Suggestion #4:** Define what is to be done with extra water accumulated after July 1 (assuming all requirements through October have already been met):

There is currently no guidance in the plan for allocating excess storage accumulated after July 1. A suggestion follows:

*"If additional water is gathered beyond what is required to satisfy all the whitewater weekends on the 2009 schedule including the “curtailed” late September Sunday release and the “planned” late September and October releases (along with the simultaneous corresponding increases in weekday flow augmentation), excess additional storage will be allocated as follows: 50% to be applied to augmenting fishery (non-whitewater event) flows up to a maximum of 500 cfs, and 50% to enhancing whitewater event flows up to a maximum of 1500 cfs. If yet additional storage is accumulated, that water will be allocated 100% to angling interests by augmenting weekday flows across the remainder of the recreation season."*

**Suggestion #5:** Define what is to be done if the pool is below elevation 1365 as of July 1:

There is currently no guidance in the plan for what to do if the pool is below elevation 1365 as of July 1. A suggestion follows:

*"If the pool elevation at FEWalter is less than 1365 as of July 1, water stored as of that date will be allocated 50-50 so that half the water is assigned to augmenting weekday and non-whitewater weekend flows by +50 cfs up to a maximum of 200 cfs and half the water is assigned to augmenting whitewater weekend releases by +600 cfs up to a maximum of 700 cfs. This curtailment may be reduced or eliminated if subsequent rain events provide enough additional storage to assure the remainder of the whitewater schedule at the originally specified targets."*

**Suggestion #6:** Create Release Rate Priority Tables for July, August and October:

Tables 1, 2, and 3 detail the Release Rate Priorities (including the possibility for a Saturday-only whitewater weekend) under various circumstances for the months of May, June and September. Three additional Tables are needed to define the same set of priorities for the months of July, August and October. Within this context, there should be provision (as there is in Table 1, 2 and 3) for a Saturday-only release under certain circumstances. These Tables would be needed if, for example, the pool elevation is less than 1365 as of July 1.

**Suggestion #7:** Modify slightly the date range for the 5-foot pool restriction:

By changing the ending date for the 5-foot pool restriction to June 26 as opposed to June 30, this more than satisfies the requirements of in-lake spawn, and removes pressure from what is the most severely jeopardized of the more meaningful whitewater events on the schedule.

**Suggestion #8:** Fishery augmentation during May-June:

If there is implemented a temperature-triggered augmentation plan for mid-week flows, and if that plan results in augmentation beginning prior to July 1, then limit weekday augmentation to not more than +50 cfs until the 5-foot pool limitation has expired.

[EMAIL, December 9, 2008]

**TO:** USACE  
**FROM:** Western Pocono chapter of Trout Unlimited  
**RE:** COMMENTS ON THE 2009 FLOW MANAGEMENT PLAN FOR THE F.E. WALTER DAM

Dear Sirs,

We offer these remarks on behalf of the Western Pocono chapter of Trout Unlimited (WPTU). When it was founded some thirty-five years ago the chapter's paramount concern was the condition of the Lehigh River's cold water fishery and so it remains to the present time. In the intervening years we have appreciatively noted great improvements in the management of the releases from the Francis E. Walter Dam--releases by which the Lehigh's magnificent cold water fishery resource lives or dies.

For the past several years it has been apparent that the Army Corps of Engineers has given recognition to the Lehigh's fishery resource and has made sincere efforts to ensure its well-being.

In short, things have come a long way from decades past. Developments like the relocation of the project's access road to permit additional storage, willingness to discuss flow management practices to benefit the river's cold water environment and, perhaps most significant, embarking on studies which, we are hopeful, will clear the way for even more substantial improvements all bode well for the resource.

Until that day comes, however, we feel that the Lehigh cold water fishery resource would benefit greatly from some changes in release management practices- changes that would afford the aquatic ecosystem a semblance of parity with the boating/rafting interests. We do not seek major concessions- just what we consider to be a fair shake for a uniquely valuable resource. With this in mind we offer the following specific recommendations:

- 1) During the period when trout are most vulnerable to thermal stress, usually in the months of July and August, augmentation of 100 cfs should be provided. 50 cfs is simply not sufficient to ameliorate the effects of high ambient temperatures in a stream the Lehigh's size. We also need to consider loss of macroinvertebrate habitat due to stream bed dewatering that occurs with a meager 50cfs release in low water conditions. We recognize that the cold water pool is typically depleted by mid-July but feel that volume alone greatly benefits the ecosystem. There is also the possibility of extending cold water availability as noted below.
- 2) Eliminate all recreational releases on Mother's Day weekend. Besides providing a modest cold water reserve for later release when it is most valuable, deletion of this event would permit fishing in the upper portions of the river on one of the season's peak weekends. Wade fishing under whitewater conditions, if possible at all, is, at best, a hazardous undertaking.
- 3) Unless maximum storage levels are threatened, releases during the months of April and May should be limited to 400 cfs or less. This would offer safe and productive angling opportunities to the throngs of fishermen using the river during the popular early season.
- 4) Avoid abrupt decreases in discharge volume following recreational release events. Trout become stressed when subjected to a precipitous decrease in water level-a phenomenon that does not occur in natural conditions.
- 5) In the spirit of compromise, consider a reduction in the volume of whitewater releases to 650 cfs. We recognize that might impact on the "wow factor" but, by most accounts, is adequate to provide a satisfactory watercraft experience. The cold water saved thereby would greatly benefit the resource without seriously diminishing anyone's fun-or bottom line.
- 6) Open the door to input from the resource-oriented stakeholder contingent before concluding the annual flow management plan and recreational release schedule. Fishermen, in particular, as major users of the river and contributors to the local economies, should have some input into the annual plan while it is still in the formulation stage. It is discouraging to be presented with a done deal.

In closing, we wish to communicate our impression that maintenance of the Lehigh coldwater fishery by means of juggling and reallocating releases in hopes that the right combination is hit-upon is, at best, a risky proposition hinging on just too many variables.

It is, however, the best we have at the moment. We believe that the real key to transforming the fishery into a world-class tailwater trout environment lies in modifying the Walter Dam tower to permit temperature selective releases combined with a significant increase in storage volume. Management of the resulting flows should be placed in the hands of, or at least heavily influenced by, fishery resource experts. We are confident that the conclusions of the Coldwater Modeling Study, if it encompasses those parameters outlined in the Lehigh Coldwater Fishery Alliance's recent commentary, will support these changes clearing the way for the Lehigh to reach its potential as a stable and extensive cold water fishery.

Thank you for the opportunity to offer these comments and thanks again for your willingness to tackle the formidable task of balancing recreational uses of the Lehigh River with the health of the resource it represents.

Sincerely,  
Ray Youngblood  
Mike Gondell  
Environmental Committee  
Trout Unlimited- Western Pocono Chapter

[EMAIL, December 10, 2008]

**TO:** USACE  
**FROM:** Rivers Outdoor Adventures  
**RE:** 2009 Flow Plan

Thank you for your continued efforts on preservation and development of the cold water fishery on the Lehigh River.

As a whitewater enthusiast and trout fisherman I recognize the balancing act all invested partners are dealing with. As an environmentalist I look at Lehigh River as a wonderful resource and as a business owner I can see the great potentials for community development through sporting recreation. With that being said, it is essential that all decisions governing the use of this watershed be made in the best interest of the river. Without its health we have nothing.

I believe that a consistent flow of 300CFS can be maintained between whitewater releases. This flow will cover the river bank to bank protecting its inhabitants, better dilute pollutants that continue to plague our river and allow for recreational and commercial boating on the lower river.

To achieve these healthy flows I am asking the commercial interests in the whitewater community to reevaluate their needs for the number of scheduled releases, especially in May. By eliminating just two of these early releases insect hatching cycles will be less disrupted allowing fish to obtain needed nourishment after winter months and a better opportunity for a targeted 300CFS flow could be met.

I am also asking that a better "dam let-down" program in October be initiated. The excess water that must be evacuated should be managed for more consistent flows as not to disrupt the breeding populations of wild brook trout and brown trout.

Sincerely,

Joe DeMarkis  
Rivers Outdoor Adventures



December 10, 2008

## **Army Corps of Engineers – Francis E Walter Flow Management Plan Recommendations for 2009**

As in previous years, the Lehigh Coldwater Fishery Alliance (LCFA) believes the yearly Recreational Flow Plan (“Plan”) requires additional adjustments, with specifically the need for additional water for the aquatic resource during the critical summer months. The adjustments are necessary to strike a better balance between management of aquatic ecosystem of the Lehigh River, recreational whitewater releases and angling interests.

With this in mind, the LCFA provides the following comments regarding the 2008 Recreational Flow Plan, as well as the 2009 Plan.

### ***Fishery Related Comments and Adjustment Concepts to the Plan***

- 1) Based on current storage levels in the Francis E Walter Reservoir (FEW), the LCFA believes 50/50 distribution of water between whitewater releases and fisheries releases is insufficient to support the developing trout fishery below FEW. This may seem as though an equitable distribution on paper, but to the inhabitants of the Lehigh River that depend on releases from FEW 24 hours-a-day, 7 days-a-week, this amount of water is paltry. The current 50/50 distribution is a limiting factor toward the health of the river’s aquatic ecosystem.

The LCFA requests a higher distribution of water be allocated toward fisheries/environmental releases thus permitting higher summertime (after July 1<sup>st</sup>) releases which are essential in providing the following:

- Adequate habitat for trout and aquatic life survival.
  - Dilution of acid mine drainage and sewage effluent that cause harm to the aquatic environment.
- 2) It is our understanding that the basic framework for the Plan was created by looking at a calendar and selecting dates for releases that worked best for the whitewater industry. With each season we learn and realize how the releases affect the down river aquatic ecosystem. Under this current plan, it is becoming more apparent that the overall quantity of whitewater releases is limiting the amount of water that can be provided to the aquatic environment.

We understand the need for whitewater releases during the time of year when the releases will be utilized the most. However, the development of these Flow Plans is fundamentally flawed and requires re-analysis to provide greater water release volumes from FEW to support and improve the health of the aquatic ecosystem.



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If four (4) whitewater events are eliminated this will create an increase in fisheries/environmental augmentation of an additional 50 cfs for 26 days. To achieve the increase in fisheries augmentation, the LCFA recommends the following:

- Making all September whitewater releases precipitation dependent.
- Eliminate two whitewater releases between July 1<sup>st</sup> and August 31<sup>st</sup>.

The LCFA requests that agencies reduce the quantity of whitewater releases for the 2009 and future Plans. The question remains, can concessions be made by the whitewater enthusiasts to provide the water necessary for the improvement and creation of a healthier aquatic environment in the Lehigh River?

- 3) Continue to restrict releases on non-whitewater weekends and weekdays (if possible) to a maximum of 400 cfs during the months of April and May. The release restriction allowed for an increase in angling opportunities and angling favorable flows.
- 4) Elimination of the “Mother’s Day” whitewater release entirely. This weekend is during the peak of what can be considered “prime time” for trout angling in PA. Having a single release on this weekend does not promote favorable angling opportunities for the entire weekend as a result of fluctuating flows and river levels.
- 5) September and October are what many consider a “second season” for trout angling. October provides excellent potential for additional angling opportunities on the Lehigh. The LCFA requests that any accumulated storage during September be used to provide angling favorable releases during the month of October while lowering the pool to conservation elevation. Water releases should be similar to those provided in April and early May.

### ***Stakeholder/Partnership Comments***

In addition to comments above, we also ask the agencies to evaluate the integrity of the “Partnership” that was formed 4 years ago – the F.E Walter Dam Flow Management Working Group. From an angling perspective this past year’s Plan performance and Agency interaction with the angling community was abysmal. Anglers were left feeling alienated, mainly due to a lack of communication. A specific example was the posting of whitewater release dates in September prior to any discussion or comments from other stakeholders. In this instance an entire group of stakeholders have been eliminated from the process since 2009 release dates have been pre-determined without angler representation or input. Surely this is not the transparent and open forum the anglers have been encouraged to engage and participate in along side the agencies. We ask that all stakeholders be treated equally, and that includes the very robust angling community that uses the Lehigh River on a daily basis.

Finally, we ask the agencies what are the “goals” of the Plan? Is the Plan merely a whitewater release plan with fisheries and ecosystem as an after thought? Or is the goal to strike a balance between the two interests, and most importantly the aquatic ecosystem of the Lehigh River. We realize that producing a balanced Plan is a rather daunting task, but like any negotiating process, concessions from either interest may have to be made. With both stakeholders having a vested interest in a healthy ecosystem, the concessions should not be difficult to administer.



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In closing, on behalf of the LCFA, I want to thank all the agencies for their cooperation and hard work in making this meeting possible 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)



Subject: Francis E. Walter Dam 209 Flow management Plan

To: All concerned agencies

From: Stanley Cooper, Sr. Chapter Trout Unlimited #251

The Stanley Cooper, Sr. Chapter of Trout Unlimited is dedicated to the goal of conservation and enhancement of Pennsylvania's cold water and fisheries, specifically our wild trout resources. Our chapter has a membership of 243 local anglers who view the Lehigh River as a great asset to the region.

As a stakeholder, SCTU supports the 2009 FEW Flow management Plan recommendations of the PA. Fish and Boat Commission and the Lehigh Coldwater Fisheries Alliance to make adjustments to the 2008 Flow Plan. A better balance between releases will enhance the aquatic resources and that of the white water enterprises. A greater flow during the summer months from July to Mid September could aid the river ecosystem and the developing wild trout fishery. A reduction in the white water release from 650 cfs to 600 cfs could provide a bank of water to be used to augment summer releases by an additional 50 cfs above inflow. Representatives of SCTU attended a meeting of Lehigh River Coldwater Flow Management Plan at the Ramada Inn, Lake Harmony on Nov. 19, 2008. They found the Lehigh River Recreational Enhancement Study presented by the U.S. Army Corp of Engineers and their ecologist showing the future potential of increased releases to be very positive.

SCTU would like to go on record as being in favor of any repairs to the FEW Dam to support a pool depth of 1392 ft. as opposed to the current 1370 ft. max. Also modification to the existing tower or the building of a new tower with a multi-portal system to mix different temperature water to maintain a 55° F release.

We realize that the funds necessary for such repairs or modification would have to come from a congressional authorization. The membership of SCTU would certainly be willing to write letters, make phone calls, or send emails to our two U.S. Senators and any local Congressman in support of the necessary funding.

Through enhanced coldwater releases the Lehigh River could become a world class tail water fishery and would become an angling destination with a positive, major impact on the regional economy.

We hereby submit our comments for the official record.

Sincerely,

Mike Romanowski, President

Stanley Cooper, Sr. Chapter Trout Unlimited #251,

PO Box 1723, Kingston, PA 18704

[EMAIL, January 24, 2009]

TO: USACE  
FROM: Whitewater Challengers  
RE: 2009 Recreation Flow Plan at Francis Walter Dam

As we anticipate the implementation of the 2009 Recreation Flow Plan at Francis Walter Dam, it is worth commenting on some of the letters posted earlier on the US Army Corps of Engineers public input web page. Each of us has a specialty and an area of expertise, so I hope I can share some of my experience and understanding regarding the concerns of those who authored these comments.

Many of the posted letters have suggested, in one form or another, that whitewater releases should be diminished in number or in size in favor of more fishery releases. Some of the reasons cited for cutting out whitewater releases are worthy of comment. For example:

1. One of the letters suggested that "The question "how much water is needed for a quality whitewater experience" should be addressed. With less water, it is my understanding that the rafting companies can still run trips further downriver." This is a reference to the fact that when the whitewater sections of the river are too low to run, people can still go on a float trip from Jim Thorpe south to Bowmanstown. It's true that this easier section of the river is still floatable at lower water levels, but it's important to remember that this is not anything like the whitewater experience visitors are coming to the Lehigh for.

Switching whitewater boaters from a whitewater trip to a float trip would be like a skier showing up for a regular day of skiing, and being told that only the bunny slope is open. Yes, he'd still be skiing. But it's clearly not the same experience, or one we would expect him to be satisfied with.

Maybe a better example would be a fly fisherman showing up to fish the river, but finding that it's closed, and being switched to bait fishing at the reservoir instead. Yes, he's still fishing, but it's a completely different experience, and it wouldn't be reasonable to ask him to accept it as being an equivalent alternative. "Running trips further downstream" just isn't a practical alternative for the vast majority of boaters who want the whitewater experience that is provided in the park.

By the way, it is possible, even easy, to very specifically address the writer's question about how much water is needed for a quality whitewater experience, by conducting the kind of study here at the Lehigh that's been done on a number of other whitewater streams around the country where paddlers are asked to float a stretch of river at different levels to determine what is the optimum water level for the whitewater experience. We could do that here at the Lehigh, and I would support that.

But I would also caution that the outcome, almost certainly, would be increased pressure for a whitewater release level much higher than what's provided for in the current water flow plan.

2. Another letter suggested that whitewater releases should be made smaller, even though this might impact the "wow factor", because "by most accounts, the lower flow is still adequate to provide a satisfactory watercraft experience."

It's worth noting that if whitewater boaters had really been pursuing the "wow" factor, we'd have requested whitewater releases of 1500 or 2000 cfs. We've not lobbied for, nor does the plan offer, the "ideal" whitewater level. The 750 to 850 cfs releases provided for in this plan represent what are called the minimum "no apologies" trip down the river. In other words, it's the minimum level at which we don't need to apologize at the end of the day for the slow pace of the trip, or for rafts getting stuck on the rocks all day. Whitewater releases are already at the very bottom end of the range of reasonable whitewater levels, so shaving them even lower would be a very very big concern to whitewater boaters.

3. Another letter talked about modifying the tower at FEWalter to permit selective withdrawal of water, an idea supported by virtually all whitewater boaters. But the letter later advocates placing management of the resulting flows "in the hands of fishery resource experts."

There is universal agreement that fishery resource experts should be consulted with regard to the proper chemistry/mixing of water drawn from the multiple portals. But not that they should given unilateral responsibility for all flow decisions, any more than a panel of whitewater experts should given that responsibility, unilaterally. Our view is that it's really important to keep a balanced approach to managing these flows, so that all forms of recreation are enhanced, not just one.

4. One letter recommended eliminating several of the May whitewater release weekends so that "the insect hatching cycles would be less disrupted, allowing fish to obtain needed nourishment after the winter months." The adverse impact of whitewater releases on the hatch cycles is presented here as being a matter of fact, yet there seems to be no evidence to support that notion, and ample evidence to the contrary:
  - a. There was a study conducted here in 1990 by Ichthyological Associates that concluded no meaningful adverse impact to the food supply associated with whitewater releases, in large part because of the specific topography of the river and its river banks.
  - b. Spring is typically the wet season when variations in flow far greater than the whitewater events routinely take place. If those larger natural fluctuations don't disrupt the hatch, it's unlikely the smaller whitewater flows would do so.
  - c. It's rather well documented that bug hatches are impacted by water quality rather than water flows.
  - d. The nearby Lackawaxen River endures some pretty dramatic water releases from Lake Wallenpaupack, Many of those releases are much more extreme than the whitewater releases here on the Lehigh. Still, the Lackawaxen is acknowledged frequently in Pennsylvania Angler Magazine as one of the premiere trout fishing streams in the northeast, thanks to its incredibly dense population of insects and nourishment for the trout.

So it seems this claim about disruption of hatchery cycles on the Lehigh needs to be taken with a grain of salt, since all the evidence we've seen so far points in the opposite direction.

5. And finally, there were a number of letters submitted by fishery groups to the COE web page that speak of a perception that the Lehigh water plan is unbalanced in favor of whitewater boating. One letter puts it this way: the plan is "merely a whitewater release plan with fisheries and ecosystem as an afterthought." This is really troubling, because I know

personally that every proposal that our group has ever offered up as a suggestion, has been really carefully thought through to make sure it was balanced, and that it addressed both whitewater and fishery benefits. It's also my understanding that from the start, the extra stored water at FE Walter has been allocated at or very close to 50/50 between the two purposes (boating and fishing) and as a result, water quality has been improved; fishing opportunities have improved; and whitewater opportunities have improved. It is to everyone's credit ... the Fish Commission, COE, DNCR, and the Wildlands Conservancy ... that this project was never approached as "merely a whitewater release plan" or that "fisheries and ecosystem are merely an afterthought." And I think comments like that really don't serve a useful purpose. From what I've seen, all the agencies and interest groups have really bent over backwards to make sure the plan is as balanced as humanly possible, and I would hope that at least for the people who've been a part of that process, we all understand that both fishing and boating recreation are legitimate and appropriate, that both have profound value, and that neither of them ever was, or ever will be, treated as "merely an afterthought."

Submitted by Ken Powley  
Whitewater Challengers