



Public Comments

U.S. ARMY CORPS OF ENGINEERS

BUILDING STRONG®

Contact:
Stephen Rochette 215-656-6432
Stephen.rochette@usace.army.mil

Consolidated Public Comments on 2013 Francis E. Walter Dam Recreation Plan and Flow Management Schedule

11/16/2013 (previously submitted to PFBC)

2014 Flow Plan Comments

- All April weekends starting opening day of trout season to the first weekend of May

All of the following is dependent upon times of high, spring time natural flows (> 400 CFS inflow) within the watershed:

1) Water releases will be consistent through the weekend - no "yo-yo" affect. Target release of 400 cfs at COB on Friday through Monday AM, or Sunday 6 PM (if required)

2) If necessary, create enough "freeboard" space in FEW to capture high inflows and allow for a consistent release of the 400 cfs target

3) If additional freeboard space is required during this time period, release higher volumes of water above inflow (i.e. inflow = 650 cfs, release = 800 cfs) starting Monday AM and begin to ramp down during the week to reach a target weekend flow of 400 cfs by Friday COB.

- Releases for the 2nd weekend of May through the end of May

Continued...

1) Priority to achieve 1370 elevation

2) Weekend fishing releases will pass inflow up to a maximum of 700 cfs. However, all releases over the weekend will be set at COB Friday and allowed to remain at that rate through the weekend.

o Priority 1 – move all whitewater events from May into June. This would include the Mother’s Day, one single Saturday and the one whole weekend (Saturday & Sunday) WW releases – a total of four events. Under this priority all weekends in June would become WW events – thus, every weekend, June – Labor Day, would be whitewater flows (i.e., The WW season).

o Priority 2 – As a compromise to the first priority, move the single WW events (Mother’s Day and the single Sat) into June. Keep the double WW event in late May(memorial day weekend?).

o Priority 3 – Failing to move any WW into June, switch the single WW events in May from Saturday to occur on Sunday. Or, have a single WW event on Saturday of Mother's day weekend and move the 2nd Saturday WW event to Sunday.

o When moving WW events to June, protect the first weekend, fill the late June weekends first.

o A fishing friendly flow was defined as 400 cfs from COB Friday to dark on Sunday. I.E., Don’t revert to inflow as outlined in the 2013 Plan to eliminate “yo-yo” effects.

Continued...

- June Releases

1) Releases during Non-WW release weekends shall be consistent throughout the entire weekend. No "yo-yo" affect.

- July 1 through August 31

1) Ensure proper water allocation for unused fisheries water. Any unused 100 CFS augmentation to extend further in the calendar year prior to future WW releases becoming guaranteed.

2) Extend the 100 cfs augmentation for as long as possible during this period. (If we have unused 100 CFS augmentation during this period, all attempts should be made to extend thru Oct 15th)

- Fall Fishing Season - September 8 through October 12

1) Provide consistent and continuous releases from FEW (~300-400 cfs) through out the period. (as performed in 2013)

Dean Druckenmiller, President
Lehigh Coldwater Fishery Alliance
www.thelehighriver.org

11/18/2013

The Wilmington Trail Club is based in Wilmington DE with paddling members convening from the quad state area of DE, MD, NJ, and PA. The club utilizes the Lehigh River's various sections from White Haven to Walnutport for training and club trips May through October. For 2013, club trips (13 of 37) and all 6 days of training were held on the Lehigh. Of the whitewater releases, 17 of the 25 available days were used. The first two training days were done on a non-whitewater (fishery) weekend as a gentler introduction of students to essentials of kayaking. The subsequent weekends depended on whitewater releases. Class sizes ranged from 17-26 trainees, ages 12-60 years. Paddler-events are the sum of boaters per day across all days on the water. For 2013, the WTC had 613 paddler-events for whitewater trips and training, of which 249 (41%) were for training (including students, helpers, and American Canoe Association certified instructors) and 151 (24%) club trips. Thus 65% of the clubs paddler-events were Lehigh River based. The WTC thanks the Army Corp of Engineers, the PA DCNR, and surrounding river communities for providing a premier destination for its activities. Information about the WTC can be found at <http://www.wilmingtontrailclub.org/Paddling/tabid/55/Default.aspx>.

Our 2014 training dates on the Lehigh have been set for May 31-Jun 1, Jun 21-22, and Jul 19-20.

11/15/2013

A couple things became clear to me over the course of the meeting. One is that so far this project has been a success. As an outfitter we have x number of days that we can offer in advance with a high degree of certainty that water will be available. As a guest planning vacation time, (family groups or large non-family groups) their time and scheduling is not a waste of time and effort caused by event cancellations. As a very active boater and environmentalist, (being on the water a lot) I have noticed a consistent improvement in the number of fish caught and the size of those fish. Also increased is the clarity of the water and the number of water fowl seen on the river. Also birds of prey, Eagles, Ospreys, and Kingfishers. Although subjective, Other peoples observations are consistent with mine. Including Wildlands Conservency director Chris Kocher and the fishermen who I pass on the river and question. They are often more than happy to show off their stringer if not practicing capture and release.

I am a believer in what Mr. Sauls pointed out in the meeting that having a release every weekend in June would not allow sufficient time to replenish the pool jeopardizing some June releases and the consistency needed to offer rafting trips.

My recommendation would be to capture the pool in March as much as possible, going to as natural a flow as possible as early as possible, then staying as close to the existing plan as possible.

Warmest regards,

Doug Fogal, Owner, Pocono Whitewater, Ltd. (private boater and fishermen)

11/15/2013

I would just like to comment on the recent public meeting discussing the Lehigh River releases. I think it would be a major economic mistake and hurt the local economy to curtail releases in May.

May is the beginning of the summer tourist season and business in general at the hotels, shops, restaurants, etc. are just emerging out of the winter doldrums. The rafters we run and bring through the local economy at that time are very important. While the numbers are smaller than the summer, they represent a much larger percentage of overall tourism dollars in May than July or August.

I can only speak for own company but no releases in May would result in us delaying hiring and cut roughly 45 jobs for the month. While these are seasonal jobs, the extra months work that the college students, local kids, and retired individuals pick-up is important to them and again rolls around the community. The general economy in Carbon County is not booming and unemployment is higher than the national average. In my opinion, it would be a major mistake to damage it more by eliminating May whitewater.

Thank You,
Paul Fogal

11/12/2013

This is in response to some of the ideas that were offered at the recent USACE public meeting (November 7th) regarding the 2014 Recreational Flow Plan for Francis Walter Dam.

First, as always, we are grateful for the time and effort already invested into crafting a water flow plan that has so dramatically improved the fishery, fishing, and whitewater boating on the Lehigh River. The collaboration between USACE, PFBC, DCNR and various stakeholder groups has been enormously productive, taking us to a place that derives significant and valuable recreational benefit from the FE Walter Dam and Reservoir. There may yet be room to tweak this plan, but it seems safe to say that the heavy lifting is probably behind us.

The initial discussion at the November 7th public meeting centered on several anglers' request to shift two whitewater releases out of the month of May, delaying the start of the whitewater boating season until Memorial Weekend. As the reason for their request to remove those two whitewater releases from May, it was described it as being essential to fulfilling a desire to make the Lehigh into a "world class, blue ribbon, cold-water fishery" - the kind that would attract anglers from around the country.

This is a lofty goal, but it's worth noting that the Lehigh was never close to being this before the dam was built, it did not become this after the dam was built, and it can't possibly become this given the current size of the watershed, the size of the dam and the size of the reservoir.

At the same meeting, we heard avid and accomplished whitewater boaters express their desire to make the Lehigh into a "world class, big-water paddling river" - the kind that would attract Class IV and Class V kayakers and rafters from around the country. This is another lofty goal, but it's again worth noting that the Lehigh was

Continued...

never this before the dam was built, didn't become this after the dam was built, and can't possibly become this given the current size of the watershed, the size of the dam, and the size of the reservoir.

We empathize with anglers who want the perfect flow every day of the fishing season. We also empathize with boaters who want big water releases during the traditional Spring run-off season of April and May, followed by consistently high flows during the summer, followed by another mega release in the fall.

But at some point - and especially in light of the enormous strides that have been made over the last 10 years to make the Lehigh a spectacularly healthier river, better fishery, and more reliable whitewater destination - we all need to become more realistic about "what we want" going forward. And we need to understand that chipping away at whitewater releases is enormously detrimental in terms of lost visitation and tourism (about 8,000 total visitors and about a million dollars in local economic benefit from the two releases likely to be lost if May dates are shifted into June). That's an enormous amount of recreational benefit to lose in support of a goal that may have no demonstrable impact on the fish, the quality of the fishery, or the number of anglers who frequent the river.

For example, in the 2013 Recreation Plan, three additional weekends in April and May (six additional weekend days) were removed from the inventory of possible boating dates and were designated as 400 cfs, angler-friendly, too-low-to-boat dates, on the basis that this would encourage greater numbers of anglers to take advantage of these known, scheduled, angler-friendly flows in the heart of the spring fishing season.

It was stated in last week's meeting, three times, that these dates were "well-received" by the angler community, but the reality is that they did little or nothing

Continued...

to boost angler usage of the resource this year - at least not along the 30-mile stretch of river from Francis Walter Dam to Jim Thorpe, where angler counts were taken each weekend day from the opening day of trout season through May 19th.

The result of those usage surveys showed only modest use of the river by anglers on opening day - still a far cry from the levels of usage 10 and 20 years ago - with an immediate drop off to just a handful of anglers each day, over a 30 mile stretch of river, for the balance of the spring season.

The premise that "scheduling more angler-friendly dates in May would boost usage of the resource by anglers" was not borne out by this past season's results. So it seems prudent, before the whitewater usage is even further adversely impacted, to at least see some uptick in angler usage on the increased number of angler-friendly dates that were injected last year into the schedule.

It's also worth remembering that from the earliest days of whitewater boating on the Lehigh River, even prior to the construction of the dam or the creation of the state park, the traditional peak boating season here was always mid-March through mid-June, plus September and October. From the 1970's through the 1990's, there were typically about 20,000 paddlers on the river during the month of April alone.

The Lehigh was accurately described in all the whitewater guide books as a "spring run-off river," where reliable flows were most likely to be found from Spring thaw through early June. Throughout the 1970's, 1980's, 1990's and as recently as 2004, the commercial and private boating season on the Lehigh consisted of the nearly 100 consecutive days each Spring, plus a 5 or 6-week fall season in the years when tropical rains or fall nor'easters returned the river to springtime levels.

Continued...

The intent of the FE Walter Recreation Plan is to fulfill the federal mandate to deliver more (and more reliable) opportunities for recreation, including downstream boating and fishing. But one of the side effects of this plan has been to constrict the whitewater boating season to just a couple dozen days, in favor of a significantly increased number of angler-friendly (e.g., "lower") flows even during the traditionally higher-flow months of April and May. For example, what used to be a 100 to 140 day boating season was essentially shrunk to a 23-day season in 2007, with the added possibility of a half dozen extra boating days in late April and early May, in years when the natural flow was high enough on those days to paddle.

Last year, even those six "possible" paddling dates were removed from the schedule, in favor of a 400 cfs angler-friendly cap. So in 2013, for the first year ever, the recreation flow plan limited whitewater boating to a maximum of 24 dates, with every other day of the season capped at either 200, 250, 300 or 400 cfs. This means that between the opening day of trout season and the end of October, the Recreation Flow Plan designated angler-friendly flows (400 cfs or less) on about 175 days, and whitewater flows on just 24 days.

The proposal to further constrict the whitewater season by removing whitewater release dates in May, with the rather remote hope that these dates can be inserted into June without jeopardizing the scheduled events on the final June weekend(s), is inappropriate, especially absent any evidence that such a change would enhance angler use of the resource in any meaningful way.

In our view, this issue should probably be re-considered when and if the existing angler-friendly release dates in May begin to show a significantly increased level of interest to anglers, as measured by attendance figures on those designated dates. Until then, our view is that the more than one million dollars in economic benefit

Continued...

derived from the two May whitewater releases, and the many jobs associated therewith, should be preserved.

Also, anglers' request to remove whitewater releases in May and replace them with more "natural" flows - while at the same time capping those May weekend flows at 400 cfs - is a somewhat self-defeating approach, because as we saw this past season, capping weekend flows at 400 cfs at a time of year when historically, natural flows are much higher than that, leads to an even worse yo-yo effect. This is because when it rains significantly during this timeframe (which is frequently - because April and May are two of the wettest, highest-flow months of the year) the pool has to be drawn down in advance of the angler-friendly weekends in order to make room to store the water that will accumulate by artificially reducing the weekend discharge to 400 cfs.

So in support of anglers' desire for more natural flows on May weekends, and a reduction in the variability of those flows, it probably makes more sense to remove the 400 cfs weekend cap in May, or at least adjust it upward to 600 or 700 cfs (it used to be 1000 cfs) so that USACE isn't forced into a position where it needs to purge an even larger flow of water in advance of these weekends - particularly since the 400 cfs cap has been shown to actually exacerbate the variability of these flows.

Respectfully submitted,
Ken Powley

11/5/2013

The Lehigh has been a big disappointment to me the last couple of years. Where's the water? I have been running the Lehigh since 1972. Maybe it's time to quit but I enjoy it so much.

I really enjoy rafting when it's over 3,000 CFS or more. We don't get many days like that anymore and never on the weekends. I've rafted it over 11,000 CFS in 2006 during the flood, very exhilarating, over 20 foot waves, you can't beat that. We were on the river many times when it went from 3,000 to 9,000 CFS, this was before the dam got larger. Rafting is an extreme sport and we all know the risks every time we inflate our rafts. Many friends won't go unless it's over 3,000.

Please give the independent guys at least 1 or 2 days of big water. Previous years 4,000 was released but on Friday? Make it a Saturday & Sunday and at least 4,000 cfs. There is no runoff in the fall so whatever is out the dam is all you get. My partner and I spent money on equipment and don't want to abuse it running at the current release levels.

Vince S.

9/23/2013

I have been running the Lehigh gorge for over 35 years and have never had so few days that entice me to hit the river. I would say typically before the modification of the dam breast that we would be on the river for big water days at least a dozen times a year, from Feb - Sep. Now it seems like we are lucky to get more than a few and never on the weekends, we must always take a day off from work. Unless it is a hurricane or huge wet season where the levels must be drawn down to have reserve capacity there is nothing for us. When they do draw the lake down they usually do it on Thursdays or Fridays and lower it back down for the weekend.

I do not see how the higher levels would impact the outfitters. I do see an impact on the fisherman, but these levels would normally be high if the dam did not exist. The Lehigh River at higher levels is much more than a usual float trip that the outfitters normally offer, but if you are a big water rafter this is what we look for. I have run the Lehigh at levels up to 11000CFS and let me tell you how exciting this river can be at those levels. It would be great if you could have one big water release on a weekend that is advertised like they do on the Gauley River in West Virginia.

It has a huge impact on the economy there since it is advertised and the outfitters are swamped by folks looking for a high water trip. I have gone down there a few times for the same reason. They also have a big festival on the same weekend where whitewater vendors display new products and this adds to the draw for the local economy. I think the outfitters and Jim Thorpe in general would embrace this as a chance to make extra money and build tourism here as well. I appreciate your time and would like to know exactly when this meeting occurs so I could make a plan to be there. And just a note, I love the Lehigh Gorge, keep up the great work!

Dale W.

1/29/2013

Our Boy Scout troop is among the many stake holders who benefit from your FE Walter Dam release program. We raft and kayak the Lehigh regularly in the fall and spring.

In recent years, it appears that more water resources are being given to the June 15 ~ Aug 31 time frame. Our troop would encourage you to include more releases on dates prior to June 1 and/or after September 15.

For example, the 2012 schedule had, effectively, one scheduled date before Memorial Day (May 12) and none after Labor Day (the Sept 14 date was cancelled). The first year my son was in the troop, there were release dates in late April / early May and late Sept / early October.

We just want you to know that, if you schedule them, we'll definitely use them!

Thank you for your good stewardship of our resources.

Respectfully,
Paul S.