



Public Comments

U.S. ARMY CORPS OF ENGINEERS

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

Consolidated Public Comments on 2014 Francis E. Walter Dam Recreation Plan and Flow Management Schedule

I just wanted to follow up to my public comments to say "Thank you! We appreciate the spring and fall releases." Our Scout troop had a record turnout for the May 17 release date (30 on the water!) and we are on track to have another good showing on the Oct 11 release.

Best regards,
Paul
ASM, BSA Troop Paoli 1

Comments concerning 10/22 Flow Management Plan Meeting

The Wilmington Trail Club is based in Wilmington Delaware, but draws members from Delaware, Pennsylvania, New Jersey, and Maryland. We use the Lehigh River as our backyard white water river, and schedule numerous trips throughout the season to the area using the river sections from Whitehaven to Bowmanstown. Over the 2014 season we had 16 white water trips to the Lehigh River with 159 total kayakers. In addition, we use the Lehigh River for our annual ACA certified training program. We schedule our training over 3 weekends in June and July that brings approximately 50-60 kayakers (instructors, helpers, students) to the area for each of the 3 weekends.

The Wilmington Trail Club Paddlers wish to thank the U.S. Army Corps of Engineers, Philadelphia District for the development and implementation of the Francis E. Walter Dam Flow Management Plan.

We do have comments regarding the 2 Saturday white water releases in May. There is always some discussion about moving those 2 releases to June. For the Wilmington Trail Club, that presents difficulties. 1) We use the 2 May releases to refresh our ACA certified instructors and re-train our on-water helpers. This is crucial for a successful, safe training program in June and July. 2) Moving the 2 May releases to June removes the assured releases in May to a weekend in June which requires rain to ensure successive June releases. Mother Nature does not always cooperate, and we may lose those white water dates by betting on the future rainfall. We recommend implementing the Flow Management Plan from the last few years in 2015.

Thank you,
Bill Johnston
Paddle Chair, Wilmington Trail Club



APPALACHIAN MOUNTAIN CLUB

YOUR CONNECTION TO THE OUTDOORS

U.S. Army Corps of Engineers, Philadelphia District
Mr. Daryl Pierce, Delaware River Coordinator, Pennsylvania Fish and Boat Commission,
Mr. Kevin Fazzini, Regional Park Manager, Pennsylvania Department of Conservation and
Natural Resources, Bureau of State Parks

Delivered by Electronic Mail

November 7, 2014

Re: Comments on the 2014 and 2015 Francis E. Walter Reservoir Recreation Operations Plan

To Francis E. Walter Dam Flow Management Working Group:

The Appalachian Mountain Club (AMC) is pleased to provide comments on the recreational management of the Francis E. Walter Reservoir. The AMC is a membership-based conservation and recreation non-profit organization that hosts thousands of outdoor activities yearly through our twelve chapters, including the Delaware Valley Chapter in Eastern Pennsylvania and New Jersey, as well as our New York-North Jersey Chapter. Our members and program participants regularly visit the Lehigh River on AMC hosted trips for whitewater paddling within and below Lehigh Gorge State Park. We appreciate and recognize the Army Corps of Engineers for managing in-lake recreation and downstream river flows in a manner that balances multiple recreational uses, while providing a truly unique and cherished opportunity to paddle the whitewater of the Lehigh River Gorge according to an established scheduled and predictable flows. The AMC also writes in appreciation for the robust public participation fostered by the Army Corps of Engineers and other resource agencies, including hosting a yearly in-person meeting of interested parties to discuss recreational flow management topics, held on October 22, 2014.

The AMC provides the following comments for consideration by the flow management working group, in advance of the development of the 2015 Francis E. Walter Reservoir Recreation Operations Plan:

1) Late season increments (#6, #8, and #10) that provide enhanced whitewater releases are cherished by recreational paddlers and should be continued.

As drafted in the 2014 recreation plan, ten planned increments provide management guidelines for water collected during the recreation season, allowing the Army Corps of Engineers to provide additional and enhanced recreational releases for whitewater paddling as well as additional habitat enhancement releases. As drafted in the 2014 plan, water collected during the season is equally allocated between whitewater paddling and habitat enhancement flows in the planned increments. This balance should be maintained.

Increments number 6, 8 and 10 provide enhanced whitewater flows that are cherished by the recreational paddling community, including AMC members, and should be continued.

The AMC opposes any changes to the established increments that would take away scheduled opportunities to paddle the Lehigh River at flows of 1,700 cfs, 1,000 cfs. or at potentially even higher flows during the Columbus Day weekend draw-down event. The AMC supports exploring new opportunities to provide additional variable or enhanced whitewater flow events, which have proven to be extremely popular among the recreational paddling community.

Main Headquarters: 5 Joy Street • Boston, MA 02108-1490 • 617-523-0636 • outdoors.org

Regional Headquarters: Pinkham Notch Visitor Center • 361 Route 16 • Gorham, NH 03581-0298 • 603 466-2721

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2) Established May and June maximum release targets of 750 cfs and 800 cfs, should be increased to 1,200 cfs.

Tables 1 & 2 provide guidance for whitewater release rate priorities for May and June and are appropriately developed to manage water in conditions when inflow is low and water storage is important to maintain future release priorities.

Tables 1 & 2 do not account for conditions when the reservoir is full and inflow is high, conditions which would allow whitewater release targets in May and June to be increased above the established maximum flow targets to allow for enhanced whitewater release events.

Increasing maximum release targets to 1,200 cfs in May and June will create an opportunity for more favorable recreational paddling conditions. Maximum flow targets of 1,200 cfs will only be met when the reservoir is already at a storage level of 1370' and when inflow matches or exceeds 1,200 cfs, making the best use of available water.

As established in the plan currently, if the pool is at an elevation of 1370' and inflow is greater than 750 cfs or 800 cfs in May and June respectively, the Army Corps of Engineers may drawdown the reservoir during the week prior to the whitewater event to ensure that the current maximum flow targets of 750 cfs and 800 cfs for May and June can be met without exceeding a pool elevation of 1370'.

Allowing whitewater releases in May and June of 1,200 cfs will provide additional management flexibility to the Army Corps of Engineers, while also providing additional opportunities for recreational paddlers to enjoy the Lehigh River at flows that are far more favorable and enjoyable than 750 cfs and 800 cfs, when conditions permit.

Tables 1 & 2, as well as the narrative language on page four, should be adjusted to a maximum release target of 1,200 cfs in May and June.

Thank you in advance for your thoughtful consideration of these comments. I would be happy to discuss these or other recommendations further. The AMC looks forward to participating in future flow management discussions as well as continuing to enjoy the outstanding and remarkable whitewater paddling opportunities provided by the Francis E. Walter Reservoir Recreation Operations Plan within and below Lehigh Gorge State Park.

Sincerely,



Mark Zakutansky
Mid-Atlantic Policy Manager
520 Long Street, Bethlehem, PA 18018
610-868-6915
mzakutansky@outdoors.org

Just a quick follow-up regarding Mark's suggestions for tweaking the Lehigh Flow Plan for 2015.

He and I spoke at length about our earlier suggestions for changing the increments. His principal concern was that in a year like 2014, positioning some additional increments in August might have jeopardized Columbus Day Weekend or some of the 1700 cfs flows in August. Of course, we both understand that 2014 was a record-setting year in terms of rain deficiency late in the season, so in most years - certainly all wetter than normal years, plus all normal years, and even some drier than normal years - this concern would be of much less consequence.

Our increments proposal specifically addressed the concern about impacting the 1700 cfs August flows by inserting an interim goal of 1400 cfs; followed by a later increment taking the target up to the full 1700 cfs. The advantageous effect of this may well be the ability to fund some August weekends with extra water (under the recently proposed increments) in circumstances when, under the current plan, the increment would need to be canceled completely, and no extra water would be forthcoming at all. Having the two-step, tiered increments enhances the probability of getting some substantial enhancement of flows in drier years, when otherwise, 1700 cfs would've been simply unattainable - like the one August weekend this year.

Mark shares paddlers' hopes for a very high drawdown on Columbus Day Weekend of as much as 4000 cfs. After some thoughtful discussion about this, we understand that the additional increments contained in the proposal we submitted last week would never - could never - result in a very high-flow Columbus Day Weekend release being canceled, because the additional increments in our proposal represent a total of only 1000 DSF of additional water being allocated prior to Columbus Day Weekend. Therefore, in a year when, for example, there was just barely enough accumulated water to provide a 4000 cfs flow that weekend, the inclusion of the additional August increments would result in a 3500 cfs flow instead. Similarly, in a year when stored water would've been sufficient to provide a 3000 cfs flow on Columbus Day Weekend, under the proposed increments, that flow would now be 2500 cfs. And so on.

Regarding Mark's additional interest in considering higher caps on May and June whitewater weekends, it's important to remember that any release greater than the current caps (750 and 800 cfs) would require that (1) inflows to the dam are higher than those targets on the weekend in question, and (2) the pool has already refilled to 1370. Mark and I talked a good bit about possible impacts on anglers, especially their concern that a high flow on Saturday followed by a dramatically lower flow on Sunday, is undesirable.

Our own belief is that changes in flow from, say, 750 on Saturday to 400 on Sunday, aren't nearly as great as variations that frequently occur naturally in response to rain events this time of year, and have occurred naturally over many millennia. Nevertheless, even assuming the possibility of some deleterious effect, Mark's proposed higher caps would not add to this debate, since the rain-induced higher flows in his scenario would spill over from Saturday to Sunday in a way that would truly mimic natural flows absent the dam. They are merely a reflection of a natural rain event occurring in conjunction with a scheduled whitewater release weekend, and combining to provide a natural flow that's reasonable and natural under the circumstances. So on that basis, I support it and see no reason not to. Thanks for considering all the different sides of these proposals. We look forward to your conclusions.

All the best,
Ken



October 31, 2014

Army Corps of Engineers – Francis E Walter Flow Management Plan Recommendations for 2015

The Lehigh Coldwater Fishery Alliance (LCFA) submits the following comments and recommendations for the 2015 Recreational Flow Plan (“Plan”), in addition to comments previously submitted for prior Flow Plans:

- 1) **Improvement of Angling Opportunities:** LCFA recommends improvement of angling opportunities by releasing water from FEW Reservoir (FEW) on all non-whitewater release weekends at a constant rate no greater than 400 CFS when inflow is greater than 400 CFS. The release rates should be reduced to 400 CFS at close of business on Friday and readjusted on Sunday evening at 6pm or Monday morning. This is particularly important during the Spring season (end of March, April, May & early June) when angling is at its peak.
- 2) In the event that releases on angling weekends cannot be a consistent 400 CFS throughout the entire weekend, the timing of the releases should be different from the 12 hr whitewater releases. The LCFA recommends trying a different protocol with regard to the timing of the releases. The LCFA recommends reducing the release to 400 CFS at 6:00 AM on Saturday and, if necessary, increase the release at 6PM Saturday. Then repeating the process for Sunday. This release timing should be reviewed again for the next seasons Plan and adjusted if necessary.
- 3) LCFA requests a designated, uninterrupted “angling season” on the Lehigh River that starts on Opening Day of trout season and ends the last weekend in May. Therefore, the LCFA requests investigating the potential of moving the two Saturday whitewater releases in May (before Mother’s Day and the following Saturday) to later dates in June or July. Typically, whitewater releases that occur on Saturdays, do not allow the trout to acclimate themselves to the rapidly changing water conditions which causes the trout to not feed as aggressively, thus causing less than desirable angling results on Sunday. Based on our angling observations, it requires a 12-24 hour period for the trout to re-acclimate themselves to the water conditions and begin to feed more aggressively.

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.org