



Army Corps of Engineers – 2008 Francis E Walter Flow Management Plan Comments (February 29, 2008)

The Lehigh Coldwater Fishery Alliance (LCFA) is submitting the following comments and concerns relating to the 2008 Francis E Walter Flow Management Plan.

Based on review of the 2008 Flow Plan, this year's Plan is a regression from the three previous Flow Plans. The 2008 Flow Plan does not provide a "better balance" for whitewater and angling nor does it provide as much protection and enhancement of the aquatic ecosystem of the Lehigh River as in previous years. The number and duration of whitewater releases results in decreased amount of cold water for the tailwater trout fishery. The number and duration of white water releases must be reduced to that in previous years in order to provide for an equitable balance between recreational enhancement and improvement of the aquatic resource. The LCFA requests that the 2008 plan and future plans provide more water for protection of the coldwater ecosystem and down river recreation.

Resource & Fishery Improvement Comments & Concerns

- 1) 50 cfs for fisheries augmentation for a river system the size of the Lehigh is insufficient for the aquatic ecosystem and natural resource of the river. Minimum releases of 300 cfs are necessary to provide the minimum protection of the tailwater ecosystem.
- 2) The 2008 Rule Curve does not require the Corps to release more than 50 cfs above inflow based on pool elevation after July 1st. A rule curve with augmentation values based on pool elevation should be used to ration the water stored in FEW in order to eliminate the potential release of high temperature water into the river. Releasing water greater than 68 Deg F is harmful to trout survival. Rationing the water will also allow conservation of the coldwater pool for a greater period of time and greatly improve the survival of both wild, put and grow, and adult hatchery trout that provide important recreation downstream of the reservoir.
- 3) The dependence on precipitation for September whitewater releases and use of water storage for all of the July and August whitewater releases, will deplete the coldwater pool more rapidly and create only minimal (50cfs) releases for fisheries augmentation. A rule curve should be used after July 1st as in previous years (i.e. 2007)
- 4) In dry years, if the pool is drawn down during the months of July and August as planned, release water could rise as high as 80 Deg F causing thermal stress and death of coldwater fish species (i.e. – trout) and coldwater macro invertebrates in the river. The release of water above 68 degrees must be avoided, if possible, to protect the juvenile brown trout, wild brown and brook trout and the food source of these fish downstream of the reservoir.
- 5) Releases of 200 cfs in May and 200-250 cfs in June, is insufficient to support the developing coldwater fishery. As stated earlier, a minimum release of 300 cfs is needed all summer to protect and enhance this recovering aquatic resource.
- 6) Erratic releases of water during October must be minimized or avoided for the same reasons given above. In order to provide the best conditions for the aquatic ecosystem during draw down of the pool, releases should be done in as steady and consistent manner as possible.



Angling Opportunity Comments & Concerns

1. Elimination of the May 11th whitewater release will provide favorable water level conditions for angling. However, the response of fish (i.e. trout) as a result of the quick unnatural reduction in water level will cause the fish to become unaccustomed to their surroundings and as a result may not feed for a period of time. In most cases, until the fish become acquainted with the immediate river conditions and water levels, will fish resume feeding. The complete elimination of the whitewater releases for this weekend would provide better angling conditions overall and simultaneously further conserve the coldwater pool.
2. The cut-back of releases to 400 cfs on the weekends of April 12-13, and April 19-20 should provide favorable water levels for angling at this time of season
3. The 50 cfs minimum augmentation is insufficient to sustain the trout now living in the river and for fishing opportunities for anglers through out the spring and summer recreational season. Higher augmentation levels or a minimum of 300 cfs is necessary.
4. The October release schedule for the weekends of 4-5, 18-19 and 25-26, may provide favorable angling conditions depending on the amount of precipitation prior to that period. However, a quick increase or reduction in the release on these designated weekends may cause fish to become disoriented and not provide a quality angling experience. A more consistent release of water over this time period would create a desirable condition for both fish and angler.

In summary, the 2008 Flow Plan presented on January 31, 2008, does not provide sufficient enhancement to the aquatic resources of the Lehigh River. The allocated water storage for prioritized whitewater releases and the reduction in minimum target releases during non-whitewater days will undoubtedly degrade the Lehigh's tailwater fishery and the downriver ecosystem. The lack of binding documentation requiring the Army Corps of Engineers to release more water (greater than 50 cfs) into the downstream Lehigh River for fisheries augmentation jeopardizes the tailwater fishery, the coldwater ecosystem and the attendant developing, economically important recreational fishery.

In closing, on behalf of the LCFA, I want to thank all the agencies for their cooperation and hard work in making the Flow Plans and stakeholder meetings possible.

Sincerely,

Dean Druckenmiller, President
Lehigh Coldwater Fishery Alliance

cc: Representative Keith McCall (email)
Representative Robert Godshall (email)
Dr. Doug Austen, PFBC (email)
Mr. Mark Hartle, PFBC (email)
Mr. Leroy Young, PFBC (email)
Dr. Robert Bachman, PFBC (email)
Senator Specter (email)
Congressman Dent (email)
Secretary DiBerardinis (email)
Lt. Col Gwen Baker (email)