



March 12, 2010

Army Corps of Engineers – Francis E Walter Flow Management Plan Recommendations for 2010

The Lehigh Coldwater Fishery Alliance (LCFA) submits the following comments and recommendations for the 2010 Recreational Flow Plan (“Plan”), in addition to comments previously submitted for prior Flow Plans:

- 1) "Clumping of Releases" – LCFA is concerned that clumping the whitewater releases during the summer months will quickly draw down lake pool during a period when inflow is typically it's lowest. This may cause a discharge of high temperature surface water during the whitewater releases that may be lethal to trout.
- 2) The LCFA is under the impression that “Clumping of Releases” was never discussed openly or publically at the Fall Stake holder meeting. Anglers were again left out of this discussion which violates the open and free discussion that has occurred in the past.
- 3) Filling process: The LCFA requests clarification on the purpose of matching inflow up to 1000 cfs on weekends during the lake filling process? The LCFA recommends keeping the release at 250 cfs up to 400 cfs for angling favorable releases through the weekends.
- 4) Special Operations: 1st two weekends of trout season April 17-18 & 24-25, have releases up to 400 cfs maximum. The LCFA requests continuing this policy for every weekend, up to the first whitewater release weekend and throughout the recreational season. This will provide increased angling opportunities on the Lehigh River.
- 5) Fisheries Releases after pool reaches 1370': weekday = 200cfs in May and 200-250 cfs in June. Clarification is needed if inflow is greater than the designated releases during this period and the lake pool is at 1370'. It is assumed if the lake pool is at 1370', outflow will match inflow; however, this is unclear as the Plan is written.
- 6) July - August: The duration of fisheries augmentation of 100 cfs is unclear. The Plan reads as though 100 cfs will be provided up to Sept 10. This area of the plan requires more detail and should be more thoroughly explained.

It is the LCFA's understanding that fisheries augmentation of 100 cfs will be provided from July 1 to July 25th, and 50 cfs augmentation from July 26 - Aug 10 if the lake pool starts at 1365' on July 1. If the lake pool starts at 1370' on July 1, 100 cfs augmentation is guaranteed up to Aug 17 & 50 cfs from Aug 18-Sept 10.

- 7) Equitable Allocation: It has been the LCFA's contention that a 50-50 distribution of water is not equitable when the aquatic resource is dependent on that water 24 hours a day, 7 days a week and 365 days a year, and whitewater needs are for only 288 hours during the recreational season. LCFA recommends at minimum a 60-40 distribution of water, fisheries to whitewater.



8) MEGA Release - “*Significant ramping for this event will allow float fishing and white water opportunities during the ramping periods*”: The quality of angling experience during this period is anticipated to be poor, at best, as a result of the recent large volume of water being released, increased turbidity and potentially rapidly dropping flows. This slug of water also has the potential to be at a temperature that trout find stressful. Therefore, this period should not be considered as part of "Angling floatable releases".

The LCFA however does understand the request for these types of releases, but does not embrace the "Angling Floatable Releases" or “Mega”- release. The LCFA would rather see the water allocated for this large release transitioned to a more steady, and increased volume of water spread over a longer period of time, and used for enhancement of the aquatic resource.

9) Beltzville Reservoir – The LCFA requests that coldwater releases (13C/55F) are maintained between July and August from Beltzville. A significant coldwater refuge is created at the confluence of the Pohopoco Creek and the Lehigh River. The exhaustion of coldwater in Beltzville can lead to a loss of this refuge area and death to the Lehigh’s trout that seek this area for survival. The LCFA also recommends that high volume water releases (> 200 cfs) from Beltzville should not exceed 18C or 65F.

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
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CC: PA Senator David G. Argall (29th District)
PA Senator Stewart J. Greenleaf (12th District)
PA Representative Robert Godshall (53rd District)
PA Representative Keith McCall (122nd District)
PA Representative Todd Eachus (116th District)
Mr. Robert Wicks – PA Tourism & Lodging