



November 15, 2010

## **Army Corps of Engineers – Francis E Walter Flow Management Plan Recommendations for 2011**

The Lehigh Coldwater Fishery Alliance (LCFA) submits the following comments and recommendations for the 2011 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 rate no greater than 400 CFS, when hydrological and meteorological conditions permit. This is particularly important during the Spring season (end of March, April, May & early June) when angling is at its peak.
- 2) Improvement to In-Stream Flows: Increasing augmentation to maintain a release of 100 cfs above inflow from July 1 to August 31 would provide benefit to the Lehigh’s aquatic resource. By increasing and maintaining 100 cfs augmentation, improvements to water quality would benefit the Lehigh River’s aquatic resources by reducing impact from Acid Mine Drainage (AMD), sewage and non-point sourced pollutants that degrade the river’s water quality.
- 3) Equitable Allocation: It has been the LCFA’s contention that a 50-50 distribution of water that has been accumulated through precipitation (“accumulated storage”) during the recreational season, is not equitable. The Lehigh’s aquatic resource is dependent on that water 24 hours a day, 7 days a week and whitewater needs only require water for 288 hours during the recreational season. LCFA requests that the Agencies review this policy and make changes to reflect the current distribution (Fisheries to Whitewater) of accumulated storage in FEW.
- 4) Beltzville Reservoir – The Pohopoco Creek provides a significant coldwater refuge area for trout in the Lehigh. The LCFA requests that coldwater releases (13C/55F) are maintained from Beltzville between June 15th and September 15th. Early spring releases should be monitored in an effort not to exhaust the coldwater pool in the lake. The LCFA also recommends that high volume water releases (> 200 cfs) from Beltzville should not exceed 18C or 65F, when possible.
- 5) 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.



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](http://www.thelehighriver.org)

CC: PA Senator Richard Alloway II (33<sup>rd</sup> District)  
PA Senator Stewart J. Greenleaf (12<sup>th</sup> District)  
PA Representative Robert Godshall (53rd District)  
PA Representative Keith McCall (122nd District)  
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