



Pennsylvania Fish & Boat Commission

BUREAU OF FISHERIES
595 EAST ROLLING RIDGE DRIVE
BELLEFONTE, PA 16823
814-359-5115 – 814-359-5153 (FAX)
E-MAIL: KKUHN@PA.GOV

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The Honorable Martin T. Causer
Chair, House Majority Policy Committee
147 Main Capitol Building
Harrisburg, PA 17120-2067

The Honorable Doyle Heffley
420 Irvis Office Building
Harrisburg, PA 17120-2122

Dear Chairman Causer and Representative Heffley:

The Pennsylvania Fish and Boat Commission (PFBC) appreciates the opportunity to submit comments regarding the re-evaluation study (Study) initiated by the U. S. Army Corps of Engineers (USACE) in partnership with the Delaware River Basin Commission (DRBC) and the New York City Department of Environmental Protection (NYCDEP) for Francis E. Walter Dam and Reservoir (FE Walter) located on the Lehigh River in Carbon and Luzerne counties, Pennsylvania. The mission of the PFBC is to protect, conserve, and enhance the Commonwealth's aquatic resources and provide fishing and boating opportunities. As such, we seek to ensure the Study proceeds in a manner which maintains and improves water-based recreational opportunities and benefits Pennsylvania's aquatic resources. We remain engaged with all phases of the Study and will continue to offer our assistance and expertise throughout this process.

The Lehigh River and FE Walter are part of a larger Delaware River basin water management system and only one variable in a basin-wide "water budget". This water budget includes the NYCDEP controlled reservoirs on the upper Delaware River East and West branches, all of the tributaries that add flow to the mainstem Delaware River between those dams and the tide line at Philadelphia, the Lehigh River and FE Walter, the Beltzville Dam located on a tributary to the Lehigh River, and all of the sources of water withdrawal along the way. Atmospheric conditions and anthropogenic uses all combine to determine flow quantity, quality, timing, duration and impacts to fish, wildlife, recreation, and the environment. Since a water budget must account for all inputs and outputs, a change in one part of the system must thereby impact another part of the system. To be comprehensive and useful for informed decision-making, the Study will need to consider many factors and present the results in a clear and understandable format.

The PFBC seeks a Study outcome that will enhance aquatic resources and improve upon current recreational angling and boating opportunities both in the lake and the Lehigh River downstream from FE Walter. We emphasize the importance of a basin-wide, holistic approach which includes Delaware River flow objectives into FE Walter operations. This will require quantification and consideration of how water management practices for operations and storage at FE Walter dovetail with basin-wide water management and operations of other basin reservoirs. Although additional storage capacity and releases from FE Walter may directly benefit the Lehigh River if properly managed, such benefits must not come at the expense of other basin-wide aquatic resources

and associated recreation, or flow reductions in the upper Delaware River due to diversion of water from upper basin water storage facilities (i.e., NYCDEP reservoirs). As such, the Study must consider how potential changes to FE Walter operations may affect other areas of the Delaware River basin including the upper Delaware River tailwater trout fisheries. Furthermore, the Study must consider how changes to FE Walter's authorization and operations may impact downriver resources, recreational interests, and other basin-wide water storage facilities (e.g., Beltzville Lake, Blue Marsh Lake, Lake Wallenpaupack) or diversions.

Completed in 1961, as a single-purpose flood control facility, FE Walter operations expanded well beyond their original function¹. The importance of water-based recreation activities has resulted in a Recreational Operations Plan² (Plan) becoming fully incorporated into the USACE FE Walter Water Operations Manual in 2016. Participation in FE Walter related recreation activities is substantial. Estimated visitor attendance (N = 263,255) and associated spending (\$23.3 million) identified Hickory Run and Lehigh Gorge State parks as the fifth highest value-added (\$15.4 million) state parks to the Commonwealth of Pennsylvania based on 2010 data (Mowen et al. 2012)³. As part of the Study, we continue to advocate for a comprehensive recreational use survey based on existing use to update the results of Mowen et al. (2012) and further inform this process. Refinement of Mowen et al. (2012) to categorize recreational use by activity type (e.g., rafting, fishing, hiking, biking) will offer improved insight to park visitor use. The Study outcomes should quantify future recreational use based on possible changes to water storage and flow management and determine how those possible changes will maintain, enhance, or detract from existing use and impact local and state recreation and the tourism-based economy.

The current FE Walter Recreational Operations Plan objectives maximize flow storage, timing, and releases to provide a workable mix of whitewater and fishing-friendly releases while maintaining appropriate flood readiness. However, additional substantial fine tuning is not likely using the current FE Walter infrastructure. Without additional hypolimnetic (coldwater) storage throughout summertime months, further development of in-lake and tailwater fisheries is highly unlikely.

A primary focus of this Study is to evaluate the feasibility of various infrastructure changes to FE Walter including multiple combinations of increased impoundment storage; coldwater releases; flow regimes providing additional fishing and boating opportunities; and analyses of how proposed changes to flow, quantity, quality, and duration may fit into the overall Delaware River basin water budget. As noted previously, the Lehigh River provides substantial positive economic impacts to the river corridor and region through excellent large-river fishing opportunities, high-use whitewater rafting opportunities, a productive lake fishery, and substantial scenic and shore-based activities. In short, this river and its recreational offerings are an economic engine in the Lehigh Valley. We are excited about the prospects of further improving its current capabilities but not at the expense of many other water uses and users including fish and wildlife within the Lehigh River and in the Delaware River upstream to the East Branch and West Branch dams and downstream to the Delaware River

¹ USACE F.E. Walter Dam & Reservoir Initial Investigative Report. 2015.

https://www.nap.usace.army.mil/Portals/39/docs/Civil/Walter/20150709_Walter%20IAR_FINAL.pdf?ver=2019-11-07-104346-420

² 2019 Flow Management Plan, Francis E. Walter Dam, USACE Philadelphia District.

<https://www.nap.usace.army.mil/Missions/Civil-Works/Francis-E-Walter-Dam/Flow-Management-Plan-Schedule/>

³ Mowen, A.J., A. R. Graefe, N. E. Trauntvein, D. J. Stynes. 2012. The Economic significance and Impact of Pennsylvania State Parks: An Updated Assessment of 2010 Park Visitor Spending on the State and local Economy. Submitted to the Department of conservation and Natural Resources, Commonwealth of Pennsylvania.

http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr_007019.pdf

Estuary near Philadelphia. At the public meeting on January 9, 2020, the NYCDEP representative clearly stated that New York City was not interested in acquiring storage or drinking water from FE Walter. However, the NYCDEP's main interest was stated to be an analysis of the potential for FE Walter to be used as a hedge against expected upstream movement of saltwater boundaries due to climate change, sea level rise, and possible lower volumes of water flowing down the Delaware River. Given that stated objective, this Study needs to identify other potential solutions to potential salt line incursion. Either addressed in this Study or in a companion study, a complete understanding of other alternatives and how they may fit into using the Lehigh River as a part of the overall water budget is essential for fully informed decision-making.

The PFBC views the Study as an exceptional opportunity and is optimistic about the potential to enhance Delaware River basin aquatic resources and the recreational opportunities they provide. We are fully engaged in the Study process and are acknowledged by USACE as a Participating Agency to the Study. We are members of basin-wide ecological technical work groups including the Delaware Basin Fish and Wildlife Management Cooperative and the DRBC Subcommittee for Ecological Flows; both with vested interests in evaluating, protecting, and enhancing basin aquatic resources. Furthermore, PFBC biologists collaborate with Study partners (i.e., USACE, NYCDEP, DRBC) and other natural resource agencies (i.e., U. S. Fish and Wildlife Service, U. S. Environmental Protection Agency) to evaluate potential ecological impacts of alternative management relative to existing use. As such, the development of an Environmental Assessment of existing conditions at FE Walter, the Lehigh River, and portions of the Delaware River has commenced.

In closing, the PFBC maintains exceptional working relationships among resource agencies and non-governmental organizations involved in the Study and beyond. Collaboration facilitates attainment of mutually beneficial outcomes for all involved stakeholders. Thank you for the opportunity to provide comment and we look forward to remaining engaged in this process to ensure to best possible outcome for a highly valuable Pennsylvania resource.

Sincerely,



Kristopher M. Kuhn
Director