

March 5, 2011

Dan Plummer
Chairman
Friends of the Upper Delaware River
1645 Bumps Eddy Road
East Branch, NY 13756

Re: *Joint Fisheries White Paper*

Dear Mr. Plummer,

Both the North East Council of the Federation of Fly Fishers (NEC FFF) and the Wild Trout Flyrodders (WTF) charter club of the FFF have received and reviewed the Joint Fisheries White Paper (JFWP) prepared by New York State Department of Environmental Conservation (NYSDEC) and Pennsylvania Fish and Boat Commission (PFBC), dated January 12, 2011.

Furthermore, we are of the understanding that a decision is to be made shortly by the Delaware River Basin Commission (DRBC) regarding the operating system that is to be used this coming water year for the operations of the three Upper Delaware reservoirs managed by the New York City Department of Environmental Protection (NYC DEP). It seems apparent that all the decree parties desire to improve upon the current system, the Flexible Flow Management Program (FFMP). We are of the understanding that the models currently being considered are the JFWP, the NYC DEP Operation Support Tool (OST), and the last permanent program, Revision 1.

We feel the deficiencies in the current FFMP include:

- 1) late summer season high water temperatures resulting from low releases,
- 2) the potential for anchor ice resulting from low winter releases,
- 3) the relatively large amount of warm water that continues to be spilled over the reservoirs,
- 4) the damage to habitat from Didymo when water levels are low and constant during spring and summer

From our point of view, the high fall water temperature is potentially the most devastating. Temperature stress on trout causes their fat to be metabolized, reducing their stored energy from spring and summer feeding, just prior to the stress of spawning and overwintering. In addition, available food resources are at a minimum during fall and winter, and more trout die during overwintering than at any other time of the year.

*Dan Plummer
Joint Fisheries White Paper
March 5, 2011
Page Two*

We believe that this stress is under accounted for in the current habitat modeling programs, and a potentially significant cause for the current poor state of the Upper Delaware fishery.

We feel that with only one significant exception, the JFWP is clearly superior to FFMP. That exception is the lowering of Pepacton releases from 140 cps to 100 cps between September 1st and the 15th. We have stated the reasons for our concern above, and will work with all the parties to rectify this situation in coming years. But given the magnitude of the enhancements in other areas, we remain convinced that the JFWP is an important improvement over the FFMP.

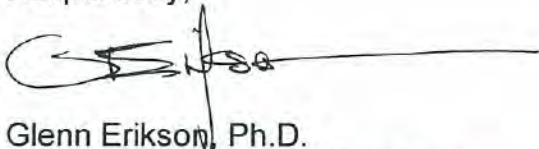
The OST may also produce overall enhancements to FFMP, including late summer water temperatures, but due to the lack of detail in the documents that have been made available to us at this time, we have not been able to achieve the level of confidence sufficient to recommend OST at this time. Perhaps with additional documentation we will be able to reach that point next year.

We feel the implementation of Revision 1 would both be difficult due to regulatory and equipment enhancements that have occurred over the years since it was last implemented, as well as the negative impacts we feel would accrue to trout habitat. We strongly disagree with its implementation.

Given the above it is the conclusion of our analysis that only one of the three considered models is demonstratively a quantitative improvement on the FFMP, and that is the Joint Fisheries White Paper.

Therefore, Wild Trout Flyrodders and the North East Council of the Federation of Fly Fishers support the implementation of the Joint Fisheries White Paper for the 2011 DRBC release year.

Respectfully,

A handwritten signature in black ink, appearing to read 'Glenn Erikson', with a long horizontal line extending to the right.

Glenn Erikson, Ph.D.
President, Wild Trout Flyrodders
Member, Board of Directors, Federation of Fly Fishers, North East Council