

## Shallcross, Amy

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**From:** garth pettinger <garthpettinger@gmail.com>  
**Sent:** Wednesday, March 20, 2019 5:47 PM  
**To:** Shallcross, Amy; Russell, Kendra L  
**Subject:** [EXTERNAL] DP Scopes of Work - COMMENTS

Hi Amy and Kendra,  
Below are my comments on the DP Scopes of Work:

### **Flexible Flow Management Program 2017 General Study Workplan COMMENTS**

#### **2.1. Interim Excess Release Quantity (IERQ) Banks:**

- The current IERQ (10bg) is too small due to the continued use of the (10bg) limit remaining in place for yet another 5 years. This limit has been in effect since 2007, despite a significant decline in NYC's annual consumption, and the return of the Croton System.

#### **2.2. Balancing Adjustment:**

- The Rivermaster's balancing adjustment procedures need to change to avoid periodic dewatering of the upper Delaware river and placing the endangered DWM species at risk.

#### **2.6. Excess Release Quantity (ERQ) Calculation:**

- The current IERQ (10bg) is too small due to the continued use of the (10bg) limit remaining in place for another 5 years. As illustrated in numerous RFAC TU presentations: today's ERQ should be more than 50bg based on the original method of calculating the ERQ; and even with a very conservative change in the calculation of NYC's Water Supply safe-yield, would still be at least 30bg. The result is affecting all discussions and decisions on the use of the ERQ banks; and is in effect, just withholding water from the rivers and lower basin States. Resolution of the ERQ Calculation Study should therefore be moved up into the first 5 year program.

Regards,  
Garth Pettinger  
Trout Unlimited