

DRBC Commission Secretary,

I am the President of the New York City Chapter of Trout Unlimited which represents over 800 members living and working in and around the five boroughs who care deeply about the ecological preservation of the Upper Delaware River watershed and its trout fisheries. Our members are residents of the New York City and therefore rely on the drinking water provided by the reservoir system in the region, but we also believe that the system can be managed in a way that better maintains the health of the ecosystem.

Because of our concerns, we cannot support the reservoir release schedules that are contained within the Flexible Flow Management Program (FFMP) due to the continued harm these releases will have on the Delaware River's ecosystem. While we support, in principle, the FFMP adaptive release concept to address the flow management issues in the Delaware River watershed, the current constraint under which the FFMP is modeled is flawed.

In concert with other entities within Trout Unlimited, including the State Councils of New York, New Jersey and Pennsylvania, we ask for the following changes to the interim FFMP which will not risk the drinking water that our members, and other New York City residents, rely upon:

1. The releases in the FFMP must be increased.
2. More release levels and seasons are necessary in the FFMP.
3. Weekly averaging of the Montague flow target is needed.
4. Directed releases for the Montague flow target must be balanced from the reservoirs.
5. A formal annual review of the FFMP is mandatory.

As both TU members and New York City residents, we recognize better than most the extraordinary efforts that are necessary for the equitable apportionment and management of the Upper Delaware watershed for both the DRBC and the Decree Parties. We also recognize that management needs for these rivers will remain dynamic and require constant assessment. By implementing the above courses of action to correct the deficiencies of the interim FFMP, the DRBC and the Decree Parties can use their power to significantly improve the health of the Delaware River and its treasured trout fisheries—and with no risk to our or any other Decree Party's water supplies or rights.

Respectfully,

John Field
President, New York City Chapter of Trout Unlimited
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