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January 15, 2021

Ms. Rebecca Rutherford  
Chief, Environmental Analysis Section, Planning Branch Huntington District,  
U.S. Army Corps of Engineers  
502 Eighth Street Huntington,  
West Virginia 25701-2070  
Email: SumLakeMstrPln@usace.army.mil

Re: Summersville Lake Master Plan Revision

Dear Ms. Rutherford,

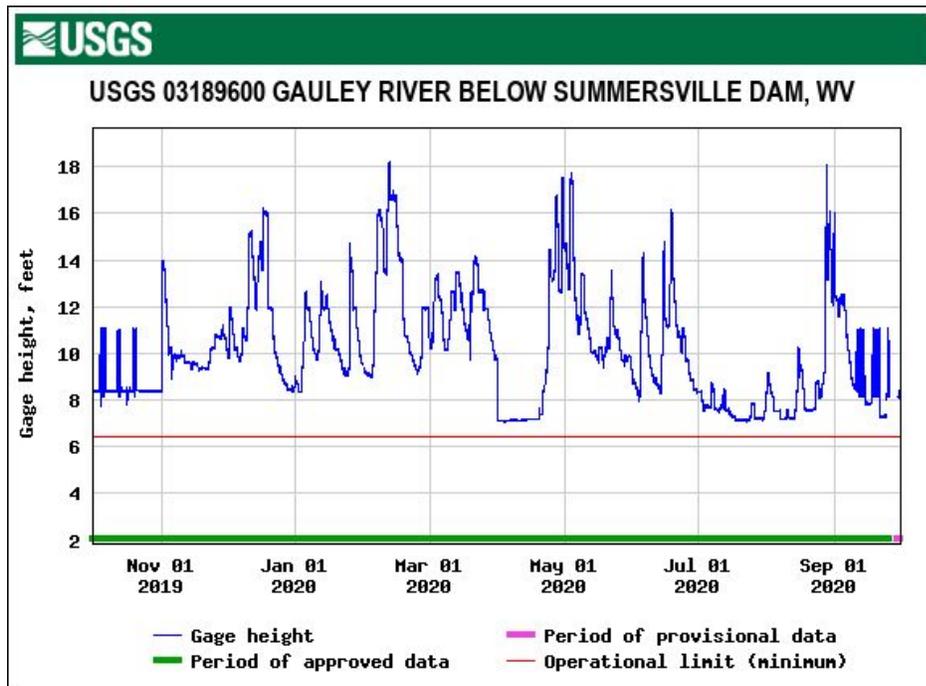
American Whitewater is a national nonprofit organization dedicated to conserving and restoring our nation's whitewater rivers and to enhancing opportunities to enjoy them safely. Our members are primarily conservation-oriented public kayakers, canoeists, and rafters, many of whom live near, travel to recreate on, or work on, the Gauley River and Summersville Lake. In addition to individual members, American Whitewater partners with numerous affiliated paddling clubs in the region. Our organization has a long history of interest and engagement in matters regarding flow releases and land management associated with Summersville Lake. We are pleased to offer these comments on the Draft Master Plan.

1. The Master Plan should include flow regime recommendations.

Summersville Dam regulates the flows into the world-famous Gauley River, which boasts incomparable high-volume Class III, IV, and V rapids in the nearly thirty miles of continuous whitewater downstream of the dam. The volume and predictability of dam releases is the dominant factor in recreational use of the river on any given day, as is evidenced by the large amount of use during the scheduled fall recreational releases in the optimal flow range. The Gauley River is managed and celebrated as a National Recreation Area, and is a major contributor to the regional economy. Yet, the Master Plan appears blind to this major effect of the reservoir, noting that Gauley River flows are dictated by the Water Control Manual which is prepared by the District's Water Resources Engineering Branch. We suggest that at least in terms of recreation, the Master Plan should include recommendations for updates to the Water

Control Manual. The Master Plan should clarify how and how often the Water Control Manual is updated and how the two plans relate.

Releases from Summersville Dam into the Gauley River are frequently in or above the optimal flow range for paddling. The most recent water year serves as an example, with the optimal flow releases depicted at around the 11 feet level on the gage:



The graph above shows the optimal fall releases during the drawdown period, a spring refill period that flatlines low flows, low but variable summer flows, and many high flow events in the winter and spring that appear to roughly follow natural inflow. It is likely that better information and/or small shifts in the timing and predictability of flow releases could have big recreational benefits.

The primary request we have at this time is to institute an online 3-day-ahead release forecast. This mitigation measure is ubiquitous at hydropower and other dams, but does not appear to be available for Summersville.<sup>1</sup> A 3-day-ahead forecast would allow paddlers to plan trips on short but reasonable notice outside of the fall scheduled release season, which could lead to increased year round use. This could serve to spread paddling use out across seasons, which could ease capacity issues and provide a larger and more steady economic benefit to the area. A 3-day-ahead forecast would not require any operational changes, and inherent to forecasts is a disclaimer that operators may change the releases as needed. Given that this is not an operational flow change, we feel it belongs as a recommendation in the new Master Plan even with the Plan's current limited scope.

<sup>1</sup> See: <https://www.lrh-wc.usace.army.mil/wm/?basin/kan/sug>

In addition, we request a recommendation in the Master Plan that calls for collaborative discussions of improved flows in the spring and summer. Modest operational changes to provide shifted releases could provide ecological and recreational benefits. As examples:

- a. Boatable (but perhaps sub-optimal) summer flushing flows could provide water quality benefits by flushing silt and iron hydroxide as mentioned in the Master Plan and predictable paddling opportunities in the peak recreation season.<sup>2</sup>
- b. The spring reservoir refill period could be lengthened and shaped to provide additional optimal or acceptable paddling flows more like the natural flow regime.
- c. Releasing natural inflow pulses could be delayed to the upcoming weekend to enhance weekend paddling without significantly changing the flow regime.

We believe that a collaborative process could significantly improve the benefits of the flow regime of the Gauley River, and ask that the Master Plan provide for and initiate that process.

In addition, we ask that the sentence in the Draft Master Plan claiming that periodic flows for rafting can have adverse effects on downstream habitat be struck as it oversimplifies a complex issue to the point of being misleading and wrong. In many cases, periodic pulse flows are in fact prescribed to benefit downstream habitat,<sup>3</sup> so stating that such flows can impact habitat ignores the equally true fact that pulse flows can benefit downstream habitat, and their elimination from a flow regime can be biologically harmful.

- Section 2.16, Recreation Facilities, Activities, and Needs should be modified to include whitewater paddling.

Section 2.16 makes no substantive mention of the whitewater paddling for which the project is internationally known. We request that this section be modified to include a discussion of the whitewater release program and the world class paddling on the Gauley River that is available year round. This discussion should include descriptions of the river reaches downstream, use numbers, references to economic impact, details of the release program, and partnership with the National Park Service.

- We appreciate the acknowledgement of rock climbing, flatwater paddling, and trail use in the reservoir area.

A significant percentage of our membership and their families also participate in rock climbing, flatwater paddling, biking and hiking. We are supportive of the various proposals to create new access areas and protect existing access to these activities, including providing separation between motorized and non-motorized boat launching.

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<sup>2</sup> See Draft Plan, Pg. 18.

<sup>3</sup> See one of many examples at:

<https://www.nao.usace.army.mil/Media/News-Stories/Article/2208856/usace-announces-gathright-dam-pulse-release-dates-for-2020/>

Conclusions:

In summary, we ask that the new Master Plan recognize the value of current dam releases and the whitewater paddling these releases support, and also provide for future enhancements to flow releases. Such enhancements could include explicit support for additional scheduled releases, and support for improved public flow forecasts of near-term release plans.

Thank you for considering the interests of whitewater paddlers in the new plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Colburn', written in a cursive style.

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