

Virginia Council



Thursday, October 1, 2015

Stocked Trout Management c/o Vic DiCenzo
Dept. of Fish and Wildlife Conservation (MC 0321)
Virginia Tech
310 West Campus Drive
Blacksburg, VA 24061

Subject: Comments on Proposed Stocked Trout Management Plan

The Virginia Council of Trout Unlimited (VCTU) represents over 4,000 anglers who are organized into 15 chapters throughout the Commonwealth. This letter represents VCTU's response to the Stocked Trout Management Plan recently proposed by the Department of Game and Inland Fisheries (DGIF). Several chapters have also submitted their comments.

As a leading conservation organization founded on the principle that if we "take care of the fish, the fishing will take care of itself", Trout Unlimited has promoted catch-and-release fishing and protection and restoration of native trout populations and their stream habitat. Our comments on the draft plan reflect this long-standing and ongoing commitment.

VCTU believes that trout anglers in Virginia are increasingly motivated by the quality of their fishing experience rather than catch rates. As evidenced by the survey results in the draft, angler satisfaction is closely tied to "non-catch aspects of fishing (e.g. being outdoors, relaxing experience, being in a natural setting)". With this in mind, VCTU recommends a management policy to increase catch-and-release opportunities through the establishment of more Delayed Harvest and Special Regulation Areas. If a stocked trout is caught more than once, the cost of stocking it brings more benefit to anglers.

VCTU also believes that the management of stocked trout should support the restoration of native trout. In Virginia, the native trout (and state fish) is the Eastern brook trout. In fact, in the Chesapeake Bay Watershed Agreement, Virginia committed to a brook trout strategy whose outcome is to "restore and sustain naturally reproducing Brook Trout populations in Chesapeake headwater streams with an eight percent increase in occupied habitat by 2025." The DGIF is identified as the lead agency in Virginia for implementing this strategy.

The stocking of trout over native populations is detrimental and should be stopped. Currently, the plan lacks clarity on when and where the stocking of trout does not conflict with a strategy

to protect and restore native trout populations. To clarify the situation, we believe terms such as “wild”, “native”, “sterile”, and “Southern Appalachian brook trout” should appear in a glossary and be used consistently throughout the plan. VCTU recommends the definitions for these terms as contained in the glossary attached to this letter.

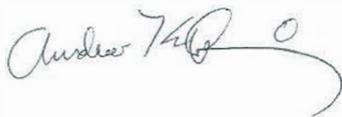
VCTU supports the use of a classification system to identify wild trout waters based upon sound science. The Virginia Water Quality Standards (9-VAC-25-260) classify streams based upon dissolved oxygen, pH, and maximum temperatures and include DGIF stream class descriptions as well. We recommend that all “Wild natural trout streams” identified “Class i” or “Class ii” be removed from the stocking program. Furthermore, we believe trout streams must be monitored for water quality and habitat conditions and reclassified as warranted.

Throughout the Commonwealth, Trout Unlimited (TU) volunteers and staff are involved (often as partners with DGIF) in restoring trout habitat. As part of these efforts, native trout are being reintroduced to their historic range. VCTU believes these projects are vital to increasing the resiliency of native populations and recommends the term “repatriated trout” to describe these situations and to avoid any confusion with traditional stocking practices. We have added this term to the glossary attached to this letter and recommend that the draft plan be amended to distinguish stocking and repatriation of trout and the situations where each is appropriate.

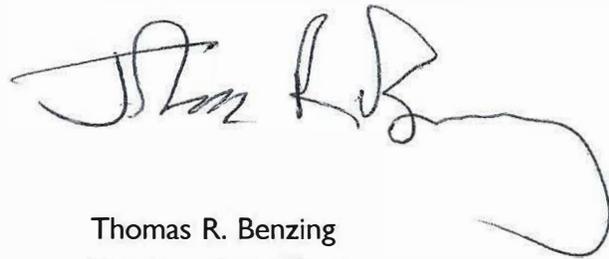
Finally, the draft management plan contains no mention of private stocking practices. VCTU is aware that DGIF reviews private stocking by requiring their Virginia Fish Stocking Authorization form and a subsequent review and approval process. As stated in this authorization form (see DGIF website), the “purpose of this authorization requirement is to protect native populations of fish, to control spread of fish diseases, and to avoid establishment of exotic fish populations in streams where such species would be undesirable.” We recommend that the draft management plan include a section affirming this goal and stating that all proposed private trout stockings be approved only if they are consistent with the plan.

We request that this letter be entered as part of the public record and look forward to your response to these comments.

Sincerely,



Kevin Daniels
Council Chair



Thomas R. Benzing
Conservation Chair

Cc: Stuart Burrill, President, Little Stony Chapter TU
Jason Williams, President, New River Valley Chapter TU
Jim Josefson, President, Shenandoah Valley Chapter TU

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Recommended glossary of terms to be appended to the Stocked Trout Management Plan

Stocked trout: Trout that are “hatched and/or reared in captivity and then released into a wild environment” (see page 6 of draft plan).

Wild trout: Trout that are hatched and reared in a wild environment (e.g. stream) through natural reproduction. Wild trout include naturally reproducing brown and rainbow trout.

Native trout: Eastern brook trout that are hatched and reared in a wild environment through natural reproduction. Wild brook trout is synonymous with native trout.

Southern Appalachian strain brook trout: Native trout that are a genetically distinct strain of Eastern brook trout. Trout populations with greater than 50% genetic purity are considered to belong to this strain for the purposes of management.

Sterile trout: Trout that are unable to reproduce under any conditions. Triploids are an example of sterile trout.

Introduced trout: Species of trout that is not native to Virginia such as brown trout and rainbow trout.

Repatriated trout: Native trout that are relocated to streams in order to restore their population within their historic range.