



Merrimack River Valley Chapter Trout Unlimited

October 17, 2007

Acting Executive Director Donald Clarke
New Hampshire Fish and Game Commissioners
New Hampshire Fish and Game Department

As long-time, ardent supporters of the New Hampshire Fish and Game department, we welcome the opportunity to provide input at this biennial hearing. Although we often work closely with Fish and Game personnel in support of common goals, we believe that the NH Fish and Game department can do a better job implementing the policies that are currently in place. In particular, the Coldwater Fisheries Program needs more support by all divisions within the department. With that in mind, the Merrimack River Valley Chapter of Trout Unlimited submits the following comments for your consideration.

We see at least three areas of potential improvement that need better coordination, management controls and resources. These are enforcement, data acquisition to improve decision making, and stocking. We also believe that New Hampshire needs increased implementation of Wild Trout Waters, and more Quality Trout Waters.

1. Enforcement – The Conservation Officers have a tough job. They have a lot of ground to cover and lots of barriers to success. They are not helped by the fact that on-stream signs are often out of date and torn down by anglers who don't like the particular regulation posted. Also, the digest of fishing regulations, signage and pamphlets often convey conflicting information. When offering proposals for additional special regulations, we often hear the reason for disapproval is enforcement issues. The COs need help and we offer the following suggestions:
 - a. Review all the signage, pamphlets and regulations to assure consistency. Volunteers are available to help.
 - b. Print new signs in sufficient quantity to properly mark special regulations areas. We can raise money to print signs and volunteers will be happy to post them at appropriate locations.
 - c. It is our understanding that fishermen are required to display their license to anyone that asks to see it, including other fishermen. Include this rule in the Fishing Digest of regulations.
 - d. Communicate to local police departments in towns with special regulations waters to be aware of those regulations. For instance, an email to police chiefs in appropriate towns prior to Labor Day weekend that the Wild Trout stream in their town closes, etc.
 - e. Since it is difficult to dispatch COs for every Operation Game Thief call, accept reports from citizens and compile a list of likely offenders and

communicate that to COs in the area. Also, accept citizen complaints with proper documentation, such as descriptions, photos, etc.

2. Data to support decisions – Today, the map of the state that documents where wild brook trout have self-sustaining populations has a lot of unknown territory. Also, we often hear the reason given for not supporting extended seasons on Quality Trout waters is that it “might” support natural reproduction, although fishing for hundreds of hours by experienced fishermen shows no sign of anything except stocked fish.

Suggestion: Let’s fill in the blanks with on-stream electroshock surveys. If there are wild fish, then let’s take all necessary steps to protect them. If there aren’t, then don’t dilute the effect of the Quality Trout waters policy where there “might be” natural reproduction. Once again, volunteers are available to help with electroshock surveys. If supplies, such as nets, waders, and batteries are needed, we can raise money to supply them. But let’s make these important decisions based on facts backed up by data.

3. Stocking - The current stocking activities cause results that are counter to the goals of the Coldwater Fisheries Program. The “Quality Trout waters” of southern New Hampshire are not in fact quality trout waters. This is largely due to haphazard stocking. The Quality Trout Waters are implemented with the goal to “provide anglers with higher than average catch rates and/or larger than average trout.” For example, the Delayed Harvest Zones on the Souhegan and Piscataquog Rivers were implemented with catch and release fishing from October 16 to June 15 and General regulations from June 16 to October 15. This is intended to provide increased fishing opportunities for an extended period of time when water is cool and then provide harvest when waters warm up. There is a complete lack of data maintained by NH Fish and Game indicating exactly where fish are stocked with regard to any special regulation water. Records are kept by body of water within a particular town, but not which stretch of river or stream is stocked. Based on records kept by NH Fish and Game there is no way to exactly know where the 865 brown trout and rainbow trout were stocked in the South Branch of the Piscataquog River on June 14, 2007. Fortunately, we know fishermen that were there during the stocking, so we know these fish were stocked in the Delayed Harvest Zone. For months there were no trout throughout the Delayed Harvest Zone other than a few in the bridge pool. Then the day before the regulations revert to general regulations almost 900 fish get stocked. This is one example of poor stocking practices based on known facts. Based on fisherman experience on the “Quality Trout” waters of the Souhegan River, Contoocook River and Sugar River the same results occurred repeatedly. Quality Trout waters can take pressure off wild trout waters, and attract fishermen who would not normally buy NH fishing license. The fish stocking practices, as currently implemented do not support the department’s policies and are wasteful

of scarce resources. Lack of accurate record keeping and management controls to assure compliance to the stated policies of NH Fish and Game department needs to be corrected.

Suggestion: Keep accurate records of fish stocked in “Quality Trout Waters.” Stock the Quality Trout Waters as early as possible to meet the goals of the program. Also, do a stocking in the fall after it reverts to catch and release to provide extended season fishing opportunities, as per the policy. If there is not sufficient budget for a fall stocking, then stock fewer fish in June and July and stock them in October instead. For ponds, do a scientific assessment of carrying ability and don’t stock huge amounts of fingerlings and/or small fish if the pond cannot support their growth to “Quality Fish” size. The practice of stocking thousands of fingerlings assures that a year later fishermen will encounter only 6 to 8 inch fish, rather than the larger fish they should expect to catch.

4. Strong support for Wild Trout Program - We request that you continue to survey and look for opportunities for additional waters to be added to the current Wild Trout Program and for further restoration to improve survival and recruitment of wild fish. Nothing will increase license sales faster, and increase flow of tourist dollars than a viable wild, native trout fishery. Once again, we stand ready to help with money for supplies and volunteer time.
5. Expand Quality Trout Waters – Quality trout waters are a scarce, much sought-after resource in New Hampshire. You only have to count the cars in the parking lots near the special regulations areas such as the Lamprey River, Piscataquog River, Profile Lake, and others to see how popular these waters have become. If you visit waters in nearby states, such as the Swift and Deerfield Rivers in MA, the Farmington and Housatonic Rivers in CT, the Mousam and Presumpscott Rivers in ME, all with extended seasons and Quality Trout regulations, you will see many cars from NH in the parking lots, along with residents and non-residents from many states. We request that you consider adding to the Quality Trout waters of New Hampshire, by both expanding beyond the existing protected areas on current rivers, adding additional rivers and ponds and extending the season, as well as doing a close review of stocking policies regarding these waters. Let’s create truly Quality Trout Waters in fact as well as name.

Thank you for the opportunity to offer this input.

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