Wood-Pawcatuck Watershed Association
203 Arcadia Road, Hope Valley, RI 02832
401-539-9017 www.wpwa.org

November 1, 2017

Mr. Jerry Elmer, President
Environmental Council of Rhode Island
PO Box 9061
Providence, RI 02940

Dear Mr. Elmer,

The WPWA Board of Trustees recently met and discussed the resolution currently before ECRI to support a proposal by Protect Rhode Island Brook Trout (PRIBT). Please accept this letter as the opinion of the WPWA Board of Trustees regarding the PRIBT proposal submitted to ECRI for consideration.

In summary, the PRIBT proposal requests that the Rhode Island Department of Environmental Management (RIDEM) establish an experimental wild brook trout management area in the upper Wood River watershed. The experimental area proposes to incorporate all streams and tributaries within Wood River watershed above Rte. 165 and extending downstream to the Barberville Dam. The proposed experiment would eliminate the stocking of hatchery raised fish, and would only allow catch-and-release fishing with specialized tackle.

While there may be a decline in brook trout populations in Rhode Island, such decline has neither been validated nor the magnitude quantified. Further study should be conducted to determine if brook trout populations are declining, and where. If an experimental management scheme is to be applied, it should not be assumed that brook trout are declining, or threatened, in the Wood River watershed. Such an assumption has the ability to seriously skew results. For instance, if no change in brook trout population size under the experimental management scheme is found, how are we to know if that's because of the experimental management scheme, or because that's simply the way it was before hand?

The experimental approach of PRIBT assumes that 4 of 5 stressors are having no impact on brook trout in the Wood River. No science is provided directly in support of that assumption. In fact, there are several sources that identify multiple stressors, such as temperature, stream flow alteration, and barriers to movement, as affecting native brook trout populations. One example is the Eastern Brook Trout Joint Venture *(http://easternbrooktrout.org/reports/eastern-brook-trout-status-and-threats/view)*. Any findings resulting from a study based on such assumptions is likely to be useless in determining cause-and-affect in a way that will be useful for management purposes.

It is likely that brook trout in Rhode Island are being affected by multiple stressors, not just fish stocking programs, if indeed they are being impacted by stocking at all. WPWA has been conducting in-stream thermal studies for a number of years in waterways throughout the

watershed, and just recently received funding to develop a database to process and analyze this information. WPWA hopes to have a report on stream temperatures early next year, and this report could provide some context around water temperature as a potential variable affecting brook trout in Rhode Island.

Closure of the upper Wood River to stocking, as proposed by PRIBT, would likely have a negative impact on recreational fishing. The suggested management area is very heavily used throughout the open trout season, and is considered one of the premier trout fishing resources in the state. A large part of the notoriety of the area as a trout resource is because of trout stocking program, which PRIBT would eliminate as part of its experiment. Closure of this area would impact thousands of fishermen who use it during the course of the fishing season, and could have trickle-down negative economic impacts for local tackle shops, and perhaps to for-hire guides that bring customers to fish that stretch of the Wood River. Some assessment of possible economic impacts from such a drastic change in resource management should be considered, with impacted parties given the opportunity to weigh in on the proposed change.

WPWA's mission is to preserve and protect the lands and waters of the Wood-Pawcatuck watershed for natural and human communities. Brook trout populations are a part of those natural communities, and therefore WPWA philosophically supports the maintenance of wild brook trout populations in the watershed. We do not however, support the approach being taken by PRIBT, which carves out a large swatch of watershed area and places it under strict conditions to conduct a management experiment based on assumptions backed by little to no science. If RIDEM has the desire to conduct such an experiment, WPWA suggests a smaller-scale pilot study be conducted, and that such study include consideration of multiple stressors, and be designed in such a manner that valid scientific output can be produced, so that any following management has a foundation for its implementation. The pilot study should include catch and release fishing as a stressor, as there is good evidence that it imparts a certain amount of mortality, which needs to be a consideration in managing for wild brook trout. The Beaver River in Richmond might be an excellent site to conduct such a pilot experiment, and WPWA suggests RIDEM consider this option, should it deem an experiment along the lines of that proposed by PRIBT worthy of further consideration. The Beaver River has a viable population of wild brook trout, and is only stocked with hatchery raised trout south of Rte. 138. A relatively small number of fishermen use this river, so the impact to recreational fishing would be limited. Information from such a small-scale, pilot study could guide future management for the brook trout throughout Rhode Island.

In closing, WPWA supports maintaining viable native brook trout populations in Rhode Island. It does not however, support the proposal put forth by PRIBT for the reasons stated above.

On behalf of the Wood-Pawcatuck Watershed Association Board of Trustees

Alan Desbonnet
President, WPWA Board of Trustees