



---

Jack E. Williams, Ph.D.  
*Senior Scientist*

329 Crater Lake Avenue  
Medford, Oregon 97504  
Phone: 541.772.7724  
FAX: 541.772.7725  
e-mail: [jwilliams@tu.org](mailto:jwilliams@tu.org)

**July 27, 2006**

Commissioner Wayne Laroche  
Vermont Fish and Wildlife Commission  
103 South Main Street  
Waterbury, VT 05671

Dear Commissioner Laroche:

I was asked by Mr. Doug Lyons of our Southwestern Vermont Chapter of Trout Unlimited to review the “Interim Plan for the Management of the Batten Kill Trout Fishery” with specific reference to Action #4, the stocking of triploid rainbow trout. The Interim Plan calls for multiple years of stocking triploid rainbow trout in an effort to boost angler opportunities pending habitat improvements that will benefit wild brown and native brook trout fisheries.

As Senior Scientist for the national office of Trout Unlimited, I oversee the scientific integrity of the national office’s research, restoration, policy and monitoring programs. Although I have not worked specifically on the Batten Kill, I am well aware of the value of this river and its fisheries to the region and applaud efforts by the State of Vermont to restore the main stem Batten Kill and its principal tributaries. As is recognized in the Interim Plan, the Batten Kill watershed has a long history of land use changes that have often been detrimental to the river and its fisheries. Clearly, a strong commitment to watershed restoration is the key to long-term improvements to the region’s fisheries.

I believe the proposal to stock rainbow trout on an interim basis is misguided and is likely to have several unintended consequences that could be detrimental to the long-term fishery restoration plans on the Batten Kill. The introduction of rainbow trout may be damaging to native brook trout and/or brown trout for the following reasons:

- Increased competition for limiting resources such as thermal refugia and food resources;
- Increased likelihood for disease, such as whirling disease introduction to brown trout;
- Complications to monitoring programs aimed at determining effectiveness of habitat restoration efforts.

Perhaps most importantly, I believe that stocking of rainbow trout serve to disconnect the fishery from the riverine habitat within the minds of anglers and agencies. Once catchable rainbow trout are stocked, they are available to anglers. According to the Interim Plan, anglers will be encouraged to catch these fish and release browns and brookies. To what extent will the angling public continue to call for fish stocking once this “interim stocking period” should end? As has happened in far too many parts of this country, it is too easy to become addicted to the short-term

Page 2: Commissioner Laroche

benefits of stocking and become blinded to the long-term consequences of developing a fishery that is separated from habitat conditions. This is a risk that should not be taken for a famous river such as the Batten Kill. The fishery in the Batten Kill should be based on biological realities and the public should actively encourage agencies to improve habitat and criticize them when good plans are not followed. It seems like your Action #2, public outreach to encourage good stream and riparian stewardship, would be more difficult to implement if the fishery appears improving even if this “improvement” is temporary and due to a non-native stocking program.

Also, river habitats are dynamic systems that may not always respond in the manner predicted by even our best plans. Drought, floods, and climate change are likely to add further complexity to these systems. For these reasons, a strong monitoring, evaluation, and adaptive management component is critical to achieving desired success. Where the Interim Plan discusses monitoring, it is primarily related to angler participation and fishing quality (Action #5). I think it is very important to use the brown and brookies as indicators of the effectiveness of habitat restoration actions. Because of the top predator position of these species, they are excellent subjects to display changes to substrates, macroinvertebrate communities, and channel conditions. Adding rainbow trout to the fish community will confuse the brown and brookies reactions to changing habitat conditions and confound the ability of scientists or anglers to deduce which changes are caused by habitat improvements, natural system variability, or the introduction of a new fish species.

Although some of the concerns of stocking rainbow trout can be mitigated by stocking smaller numbers of fish and by stocking triploid fish, I believe it would be in the best long-term interests of the fishery to preclude rainbow trout stocking all together. The value of the Batten Kill to Vermont, and indeed the broader nation, is too great to risk further impacts by rainbow trout introductions.

I appreciate your attention to my concerns and the interests of the Southwestern Vermont Chapter of Trout Unlimited. Please feel free to contact me at the letterhead address if I may address any additional concerns.

Sincerely,

*Jack E. Williams*

JACK E. WILLIAMS, Ph.D.

Cc: Eric Palmer  
Ken Cox  
Doug Lyons  
Eric Rickstad  
Jeff Reardon