

NEW YORK STATE | Department of Environmental Conservation

Assessment of public comments on draft New York State Trout Stream Management Plan

OCTOBER 27, 2020

Andrew M. Cuomo, Governor | Basil Seggos, Commissioner

A draft of the Fisheries Management Plan for Inland Trout Streams in New York State (Plan) was released for public review on May 26, 2020 with the comment period extending through June 25, 2020. Public comment was solicited through a variety of avenues including:

- a posting of the statewide public comment period in the Environmental Notice Bulletin (ENB),
- a DEC news release distributed statewide,
- an announcement distributed to all e-mail addresses provided by participants at the 2017 and 2019 public meetings on trout stream management described on page 11 of the Plan [353 recipients, 181 unique opens (58%)], and
- an announcement distributed to all subscribers to the DEC Delivers Freshwater Fishing and Boating Group [138,122 recipients, 34,944 unique opens (26%)].

A total of 489 public comments were received through e-mail or letters (Appendix A, numbered 1-277 and 300-511). 471 of these comments conveyed specific concerns, recommendations or endorsements; the other 18 comments were general statements or pertained to issues outside the scope of the plan. General themes to recurring comments were identified (22 total themes), and responses to these are included below. These themes only embrace recommendations or comments of concern. Comments that represent favorable and supportive views are not included in this assessment. Duplicate comment source numbers associated with a numbered theme reflect comments on subtopics within the general theme.

Theme #1

The statewide catch and release (artificial lures only) season proposed to run from October 16 through March 31 poses a risk to the sustainability of wild trout populations and the quality of the fisheries they support that is either wholly unacceptable or of great concern, particularly in some areas of the state; notably Delaware/Catskill waters. The principle biological concerns were injuries and losses of spawning trout and losses of incubating eggs due to disturbance of redds (trout nests) by wading anglers. Some comments acknowledged that these potential impacts were miniscule in comparison to natural limitations such as flow conditions, natural predators and redd disturbance by other spawning trout, but felt that the additional fishing opportunity provided by the proposal did not justify accepting any risk whatsoever.

In addition, concerns were expressed about the potential for increased trespassing, conflict between anglers and hunters, and inadequate law enforcement during this portion of year. Some comments asserted that the presence of large spawning trout in small streams would encourage angling practices contrary to the principle of fair chase. Several comments suggested that such practices would be further encouraged by the desire to post photographs on social media. Many comments reflected the view that the proposal was simply an unnecessary change to a long-accepted and satisfactory regulation. Finally, some comments stated that the closed season provided trout with a well-deserved seasonal respite from angling during which to complete their reproductive cycle.

Response

This concern was considered extensively during plan development and again based on comments received during at one of the fall 2019 public meetings. An extensive review of the available published research and the experience of DEC (special regulations) and other jurisdictions was completed to assess the potential risk associated with proposal. This assessment is included in the Appendix 1 of the Plan.

Negative impacts to reproductive success are not evident in resident or migratory populations of trout and salmon in New York that have long been managed under an open season by special regulation. This is consistent with research findings and management experience from other states including Pennsylvania and Idaho. Cold ambient temperatures are a key protective influence in terms of the resiliency of trout to handling and limiting the extent of angler participation. It is noteworthy, however, that natural reproduction has increased over time in Great Lakes tributaries despite intense fishing pressure concurrent with spawning and egg incubation.

From a biological perspective, summertime thermal stresses on trout combined with high angling pressure have a higher potential to impact wild trout populations and individual trout that are sexually mature. Arguably, an analogously conservative response to unethical summertime anglers would be a statewide season closure in July and August.

In response to the public concern and opposition expressed, the DEC will work with stakeholders to develop and implement a study to evaluate the catch and release season to determine if it produces negative population level impacts.

Comment Source Number: 7, 12, 15, 25, 40, 74, 75, 127, 129, 136, 137, 303, 309, 316, 317, 318, 319, 320, 321, 322, 325, 326, 328, 329, 330, 332, 335, 337, 339, 340, 341, 345, 346, 347, 348, 350, 351, 354, 356, 358, 359, 361, 362, 363, 365, 367, 369, 370, 371, 372, 376, 379, 381, 383, 384, 385, 386, 388, 389, 391, 393, 395, 396, 397, 216, 218, 225, 226, 237, 239, 240, 242, 243, 244, 247, 248, 249, 250, 404, 410, 411, 415, 416, 417, 422, 423, 427, 428, 429, 430, 255, 433, 435, 437, 438, 443, 257, 444, 445, 448, 452, 453, 455, 456, 457, 459, 460, 264, 465, 466, 467, 470, 475, 477, 478, 483, 485, 488, 489, 490, 491, 270, 271, 272, 276, 327, 331, 366, 399, 409, 420, 324, 214, 221, 456, 461, 481, 488, 147, 259, 213, 441, 476, 270, 180, 382, 256, 261, 265, 476, 269, 143,150, 151,152,153, 155, 156, 157, 158, 159, 160, 161, 302, 174, 305, 307, 174, 181, 182, 183, 184, 185, 187, 188, 189, 190, 191, 192, 194, 195, 197, 198, 199, 202, 377, 205, 206, 210, 212, 227, 229, 230, 238, 251, 259, 488, 7,12,15, 40, 92, 128, 300, 314, 323, 324, 352, 374, 392, 208, 233, 236, 401, 402, 420, 254, 439, 262, 462, 463, 468, 481, 488, 421, 276, 327, 331, 366, 399, 409, 420, 324, 214, 221, 456, 461, 481, 488

Theme #2

Angling regulation violations are a serious problem because they are detrimental to trout populations and/or detract from a positive angling experience. More law enforcement effort is needed.

Response

Because the Division of Fish and Wildlife (DFW) does not control the relative priorities or resources available to the Division of Law Enforcement (DLE), law enforcement efforts cannot be directly addressed in the Plan. However, DLE was consulted in the development of the regulations proposed in the plan to confirm their clarity and practical enforceability. By reporting observed patterns of illegal behavior, anglers and DFW staff can help to maximize the impact of DLE efforts.

Comment Source Number: 2, 14, 28, 31, 42, 73, 98, 173, 179, 392, 222, 235, 241, 265, 324, 344, 443, 463, 276, 327, 331, 366, 399, 409, 420, 324, 214, 221, 456, 461, 481, 488

Theme #3

Errors, omissions or deficiencies in the information provided in Appendix 2: Initial Stream Reach Category Assignments

Response

Stream reach category assignments have been revised to correct several specific errors or omissions identified by reviewers and updated to include management category changes based on reassessment. Appendix 2 and 3 of the draft Plan are now part of a stand-alone document entitled *Categorization of New York State Trout Stream Reaches* (NYSDEC 2020). Going forward, this document will be updated to reflect changes in categorization that will take place over time.

With respect to the difficulty of identifying reach boundaries from numbered tributaries, this issue will be resolved by the interactive map proposed in the "Information and Outreach" section of the Plan. Angler-friendly boundary descriptions were developed wherever adjoining reaches fall under different regulations. For *Stocked* and *Stocked-Extended* reaches, the species stocked will be included in the map. Several errors or omissions with respect to specific waters have been corrected.

Comment Source Number: 5, 45, 66, 223, 235, 252, 270

Theme #4

Stocking trout during the harvest season is pointless because they are rapidly fished out. Catch and release or some period of harvest prohibition post-stocking should be imposed.

Response

This issue is addressed in the plan under "Other Angling Regulations That Were Considered." Substantial losses of stocked trout from stocked reaches due to natural predators and outmigration are typical in New York State and elsewhere. Therefore, a harvest prohibition has very limited potential to extend the "shelf life" of a batch of stocked trout and comes at the cost of disadvantaging licensed anglers in favor of natural predators. Very short-term harvest prohibitions associated with specific stocking events minimize this cost but are impractical to coordinate and implement. Plan strategies aimed at this problem include more frequent stockings within *Stocked-Extended* reaches and strain improvement to produce trout that exhibit more natural dispersal behavior after stocking.

Comment Source Number: 1, 2, 18, 44, 49, 71, 91, 95, 97, 113, 125, 173, 201, 406

Theme #5

The daily trout possession limits proposed under this plan are too liberal to effectively sustain wild trout populations or extend the fishing opportunity provided by stocked trout; more restrictive harvest regulations are needed.

Response

Creel surveys conducted over the decades in New York and elsewhere demonstrate that the harvest of a full possession limit as the outcome of a trout angler's trip is relatively uncommon. Meanwhile, the profound influence exerted by habitat constraints and natural predators on trout abundance tends to be underappreciated. As discussed under the "Wild Category" in the Plan, evidence from brook trout studies in Pennsylvania and Vermont confirms the limited potential for restrictive harvest regulations to shape trout populations.

The daily possession limits proposed in this plan are actually more restrictive then what currently exists. The proposed harvest limits are meant to spread the resource out more equitably amongst the angling public and restrain excessive harvest by harvest-oriented individuals when the combination of circumstance and skill create such an opportunity. In addition, the possession limits proposed in this plan communicate the higher value of mature wild trout and stocked trout greater than 12 inches.

Comment Source Number: 7, 104, 162, 69, 56, 181, 175, 490, 147, 38, 27, 8, 25, 31, 38, 125, 126, 257

Theme #6

The reach level management proposed in the Plan does not consider the role of tributary streams or the larger watershed; wild trout are not adequately protected because the plan does not eliminate stocking in reaches with wild trout populations at low abundance or in reaches adjacent to robust wild trout populations.

Response

The criteria for the wild and stocked categories under the plan preclude supplemental stocking over wild trout populations exceeding 40 pounds of trout per acre (or 300 yearling or older trout per mile). This is a dramatic shift from our current management that is relatively blind to the difference between stocked trout and wild trout. The Plan allows for stocking to expand fishing opportunity in reaches with a lower abundance of wild trout if they are greater than ten feet wide, have adequate public access, and at least 75 hours/acre of fishing pressure. Smaller streams with low fishing pressure that contain wild trout are not stocked. The Plan strives to balance the protection of wild trout with the ability to provide fishing opportunity that would not otherwise exist while providing anglers with a clear expectation of how a reach is managed. Finally, the plan is adaptive such that reach classifications and boundaries may be adjusted in response to new information and management actions such as habitat improvement.

Comment Source Number: 235, 259, 143,150, 151,152,153, 155, 156, 157, 158, 159, 160, 161, 302, 174, 305, 307, 174, 181, 182, 183, 184, 185, 187, 188, 189, 190, 191, 192, 194, 195, 197, 198, 199, 202, 377, 205, 206, 210, 212, 227, 229, 230, 238, 251, 259, 488, 147, 9, 263, 270, 143,150, 151,152,153, 155, 156, 157, 158, 159, 160, 161, 302, 174, 305, 307, 174, 181, 182, 183, 184, 185, 187, 188, 189, 190, 191, 192, 194, 195, 197, 198, 199, 202, 377, 205, 206, 210, 212, 227, 229, 230, 238, 251, 259, 488, 143,150, 151,152,153, 155, 156, 157, 158, 159, 160, 161, 302, 174, 305, 307, 174, 181, 182, 183, 184, 185, 187, 188, 189, 190, 191, 192, 194, 195, 197, 198, 199, 202, 377, 205, 206, 210, 212, 227, 229, 230, 238, 251, 259, 488, 324, 344, 352, 468, 276, 327, 331, 366, 399, 409, 420, 324, 214, 221, 456, 461, 481, 488

Theme #7

The Plan should manage more trout stream reaches under permanent catch and release regulations that apply to the entire season.

Response

The benefits of catch and release regulations depend heavily on both the quality of the stream habitat and impact of harvest rate relative to the mortality rates associated with other causes. Broadly imposing catch and release or other highly restrictive regulations that do not produce substantial improvements in the quality of the fishery runs the risk of discouraging many anglers and creating the perception that DEC is managing solely to accommodate the preferences of a subset of trout anglers. The practice would also result in a substantial waste of fish in reaches managed for stocked fish.

Comment Source Number: 37, 72, 90, 91, 109, 113, 119, 123, 129, 139, 164, 171, 176, 201, 203, 337, 339, 363, 364, 392, 398, 406, 443, 450, 264, 94, 327, 343, 350, 217, 235, 432, 481, 490

Theme #8

The Plan should broadly restrict tackle (single hook, barbless hooks, ban live bait) particularly on reaches managed for wild trout.

Response

While advantages of certain types of terminal tackle are intuitive with respect to the survival of released trout, the published research on the benefits of tackle restrictions is ambiguous at best. Several studies have shown that outcomes depend less on the type of terminal tackle than on other aspects of angling technique or water temperature. As with other highly restrictive regulatory strategies, tackle restrictions run the risk of discouraging many anglers and creating the perception that DEC is managing solely to accommodate the preferences of a subset of trout anglers. Therefore, the plan proposes to address the issue of appropriate tackle selection and ethical angling practices for catch and release fishing through outreach and education.

Comment Source Number: 103, 125, 164, 315, 323, 342, 233, 235, 261, 269, 313, 315, 324, 261, 27, 421, 344, 255, 264, 463, 352, 374, 217, 233, 401, 402, 262, 484

Theme #9

More effort should be made, with the assistance of partners, to distribute stocked trout beyond typical bridge pools.

Response

Some DEC stockings are already conducted in this fashion. While some published research suggests that the benefits of this strategy are limited, and the capacity of volunteers and DEC staff to effectively coordinate and implement this strategy is finite, the DEC is open to working with partners to implement this approach where feasible.

Comment Source Number: 34, 37, 38, 51, 162, 171, 180, 252, 257, 421

Theme #10

Stock trout in the fall to provide additional fishing opportunity and to allow them more time to acclimate to the stream before exposure to harvest.

Response

Fall is a harsh season for freshly stocked trout to adapt to a stream. DEC has not found this strategy to be successful and this finding is consistent with published research on the subject.

Comment Source Number: 44, 67, 72, 84, 235

Theme #11

Private landowners are concerned that longstanding stocking permits for non-publicly accessible stream reaches will not be renewed under the plan.

Response

The fish and wildlife resources in New York are property of the people of the State. Regional Fisheries Managers are responsible for protecting these resources and determining risks any action may have on wild populations of fish. They will continue to have the discretion to issue or deny permits for stocking non-publicly accessible stream reaches and ensure that wild populations are not negatively impacted through the introduction of stocked fish.

Comment Source Number: 310, 169, 419, 454, 464, 469, 472, 479, 480, 482, 484

Theme #12

The plan does not adequately protect wild and native trout because too much discretion is given to manage for either wild or stocked trout in reaches that do not meet the trout abundance criteria for *Wild-Quality* classification.

Response

The wild trout abundance criteria in the plan are designed to strike a balance between protecting wild trout populations on one hand and providing for the use of stocked trout in marginally productive stream reaches with high enough angling pressure to provide fishing opportunity that would not otherwise exist.

Comment Source Number: 9, 343, 240, 263, 90, 308

Theme #13

Watershed level factors should exert a strong influence in the prioritization of habitat enhancement work.

Response

DEC is committed to focusing scarce resources on projects with the best chance to achieve an enduring benefit. The importance of factors beyond the reach scale is recognized and DEC will strive to address habitat needs to the broadest extent possible regarding watershed scale. We hope to leverage work at the reach level to encourage conservation organizations and partners to help expand upon our efforts and repair entire systems.

Comment Source Number: 143,150, 151,152,153, 155, 156, 157, 158, 159, 160, 161, 302, 174, 305, 307, 174, 181, 182, 183, 184, 185, 187, 188, 189, 190, 191, 192, 194, 195, 197, 198, 199, 202, 377, 205, 206, 210, 212, 227, 229, 230, 238, 251, 259, 488

Theme #14

The plan must enhance the quantity and quality of outreach and education on the new approach to trout stream management, the value of wild trout, and a variety of important trout conservation topics. This concern includes promotion of angling ethics and familiarizing anglers with new regulations through multiple media including streamside signage.

Response

Outreach is recognized as a vital component of this plan. DEC is committed to improving the efficacy of its efforts and leveraging its impact through creative collaboration with partners. DEC is eager to communicate the value of wild trout and what they represent from an ecosystem perspective. We are hopeful that the labeling of waters as Wild will garner greater appreciation and protection of this resource, especially in face of climate change.

Comment Source Number: 28, 38, 368, 241, 254, 270, 418, 476, 28, 38, 72, 219, 220, 246, 254, 45, 84, 85, 313, 219, 220, 224, 241, 246, 254, 262

Theme #15

The plan should include strategies for the reduction or control of trout eating predators particularly Common Mergansers.

Response

The ability of the DEC to directly control migratory waterfowl is constrained by international treaty. Moreover, fish eating waterfowl hold very limited appeal for hunters. The Plan focuses on habitat improvement and improvement to hatchery strains to enhance predator avoidance.

Comment Source Number: 17, 39, 54, 135, 164, 186

Theme #16

The plan must include additional detail on how progress towards its goals will be evaluated and how changes to the plan would be considered and implemented.

Response

DEC will revise the document to address these concerns including the development of a progress report card that will be used to track progress.

Comment Source Number: 89, 180, 219, 220, 223, 252, 267, 143,150, 151,152,153, 155, 156, 157, 158, 159, 160, 161, 302, 174, 305, 307, 174, 181, 182, 183, 184, 185, 187, 188, 189, 190, 191, 192, 194, 195, 197, 198, 199, 202, 377, 205, 206, 210, 212, 227, 229, 230, 238, 251, 259, 488, 147

Theme #17

The plan should focus additional effort on mitigating the intra and inter-agency hurdles that impede progress on habitat protection and habitat enhancement projects; issues of concern pertain to historic preservation, water use classifications, dam safety, and water quality among others.

Response

This comment is largely outside the scope of this document. The Bureau of Fisheries has and will continue to collaborate with peers inside and outside of the agency to advance matters that are in the best interest of our fisheries resources.

Comment Source Number: 143,150, 151,152,153, 155, 156, 157, 158, 159, 160, 161, 302, 174, 305, 307, 174, 181, 182, 183, 184, 185, 187, 188, 189, 190, 191, 192, 194, 195, 197, 198, 199, 202, 377, 205, 206, 210, 212, 227, 229, 230, 238, 251, 259, 488

Theme #18

The Delaware Tailwaters are unique and require their own fisheries management strategy.

Response

In collaboration with partners, DEC is currently conducting an extensive fisheries investigation on the Delaware Tailwaters to inform a fisheries management plan for this system. Based on the information currently available we believe that the categorization of reaches associated with the Tailwaters is correctly applied. Fisheries management extends beyond season and harvest limit setting. The Tailwater Fisheries Management Plan will be comprehensive and include specific strategies such as habitat improvement and monitoring of the fishery.

Comment Source Number: 68, 324, 276, 327, 331, 366, 399, 409, 420, 324, 214, 221, 456, 461, 481, 488

Theme #19

The plan should directly address reservoir release and flow management in the Delaware Tailwaters.

Response

The Plan was developed to focus resources under the control of the Bureau of Fisheries. The Bureau will continue to participate actively in the evaluation of flow management strategies as they relate to the welfare of the wild trout populations in the Delaware Tailwaters.

Comment Source Number: 96, 324, 343, 352, 374, 236, 401, 262, 463, 468, 276, 327, 331, 366, 399, 409, 420, 324, 214, 221, 456, 461, 481, 488

Theme #20

As a stocked tributary to the *Wild-Premier* Delaware Tailwaters, Oquaga Creek should receive a high priority for habitat enhancements to support management as a *Wild-Quality* reach. Management with stocked trout is undesirable in this system.

Response

DEC will work with the relevant partners to assess the improvements needed and the likelihood of a long term successful outcome.

Comment Source Number: 324, 256, 276, 327, 331, 366, 399, 409, 420, 324, 214, 221, 456, 461, 481, 488

Theme #21

The Delaware River mainstem reach from Lordville downstream to Callicoon should be categorized as *Wild-Premier*.

Response

This reach lacks the ecological characteristics and temperature regime for a year-round trout fishery and does not meet the *Wild-Premier* criteria. However, the DEC agrees with the comments asserting that, outside of the warmest summer months, fish from within *Wild-Premier* sections of the tailwater system inhabit this reach and that the same angling regulations should apply. With the concurrence of Pennsylvania Fish and Boat Commission, DEC will apply the same angling regulations as proposed for the *Wild-Premier* category for this border water, but it will not be categorized as such.

Comment Source Number: 68, 178, 179, 324, 344, 352, 374, 382, 401, 402, 262, 463, 468, 276, 327, 331, 366, 399, 409, 420, 324, 214, 221, 456, 461, 481, 488

Theme #22

Esopus Creek should be managed without stocking as a *Wild-Quality* reach rather than *Stocked-Extended* as proposed in the draft plan.

Response

In response to the extensive comment on this reach, DEC reviewed the available data and changed the category to *Wild-Quality* as suggested. Follow up evaluations will be conducted to monitor the impact on the fishery and wild trout population. The Plan is intended to be a dynamic document with the expectation that the management categories of particular stream reaches will change in response to new information or successful management strategies.

Comment Source Number: 77, 144, 306, 200, 349, 355, 360, 387, 394, 228, 232, 408, 425, 437, 451, 473, 474, 338, 342, 381, 392, 398, 213, 228, 232, 245, 260, 265, 477, 269, 492, 493

Appendix A: Public Comments

The comments listed in this Appendix are copied and pasted directly from email or were copied directly from attachments with no attempt to format the content. Handwritten letters were typed in by DEC personnel. Personal identifying information has been removed.

There are no comment numbers for numbers 278 through 299 due to the manner in which the comments were processed. No comments were omitted from this assessment.

The comment numbers are used for the comment source numbers.

Comments by Number

1) Stock and wait before you open up the season, thus giving the stocked fish time to adapt. People slaughter these fish and they don't get a chance to grow!

2) I know under 14 yrs no license is required but I have seen these children take small trout. I know certain rivers / streams are stocked and regulated to persons and catch styles. One thing I'd like to see is when a river/lake is stocked I'd like to see a 1 week catch release only. Not for nothing catching a fed fish is easy. Catching a get your own food is not. I'd like to see more education related techniques and requirements enforced Thank you

3) This should not be about streams only and you can send this to Steve Hurst if you would like. He's killing our walleye population in Saratoga Lake, Kayadeross stream spawn location by not allowing a special reg for opening of walleys season from March 1 to March 15 in Saratoga County. Two weeks might not help much but lets try it. As the ice in many lakes now melting sooner than what used to be the walleye are spawning earlier than what used to be, therefore we need to adapt the regs for this spawn. But he will not hear it even though our biologist for this lake knowns its the right thing to do to protect this species. The un-informed fishermen are killing the females at an alarming rate here and the last fish survey for the lake had no walleye. But he will not hear it. Our ECO'S try to watch the creek to make sure these un-informed fishermen know about the spawn and the closed fishing locations on the stream. They know how important it is to try to protect them.

4) I suggest a reduction on fishing license cost. Proportional to the percentage of the reduction in stocking numbers.

5) Page 46: Why is the Hoosic River excluded from the Appendix?

6) On stocking the Cattauraugus Creek in Arcade NY. It's stocked right before a tri town fishing fest. Hundreds to thousands of Sportsmen and Sportswomen show up. They pay a fee to catch trout that are tagged to win prizes. The creek is stocked a few days before this 'contest'. Does The tri town sponsors pay for this tagged fish stocking? My whole point is after this contest, fish are totally depleted. ALL of us fishermen are paying for a stocking so tri town makes money! Even if it is for a good cause. Its not right. The 'catt' in arcade is useless after this. Fishermen keep or let die without using them for a meal way too much. Stock this creek but don't allow paying fishermen to be contest winners. Especially on the dime of all other fishermen in NY. It may seem like a fun affair to get folks out fishing but it's just a money making outing for tri town. If I'm out of line on this...sorry. If not, I just had to express myself. Other than this I think DEC does a nice job. Thanks

7) The bag limits on wild, wild quality, and wild premier reaches is too high. If an individual keeps a limit of 5 fish/day for let say 20 outings per year on a wild reach, that's 100 fish/year. Multiply that by how many fisherman? That could decimate wild trout populations on smaller wild streams. I would suggest having a 1 fish/YEAR limit on wild, wild quality, and wild premier reaches (maybe establish a tag system). If an angler wants to keep more fish, then they can fish stocked and stocked extended reaches, as these reaches are in abundance throughout the state, while the wild reaches are not. We need to protect our wild reaches.

   I highly disagree with having a catch and release season from oct 15 – april 1, especially in the upper Delaware watershed. I believe the current regulations in the upper Delaware watershed (meaning waters below the cannonsville and pepacton reservoirs) are working well because of the high trout populations and abundance of large wild fish. Why change those regualtions? I have witnessed the very large spawning brown trout in the tribs to the upper Delaware in the fall, and in my opinion a lot of folks would see this as an opportunity to catch a trophy (I have seen hundreds massive spawning browns in those tribs). Please please please do not allow fall fishing on these tributaries. Ripping wild fish off redds in small feeder creeks is not what this state should be about. Reconsider this reg at least for the upper Delaware.

8) I would like to see a proposal for 3 fish to be kept per day rather than 5. I feel that 5 fish per day is far too many.

   Also, while being a catch and release fisherman I do like the prospects of being able to fish in the "off-season," I believe others will take advantage of this new secondary season and keep fish regardless.

9) The draft trout steam management plan fails to acknowledge the findings of the survey for undocumented brook trout populations that were completed in NYS. For example, several streams listed in region 9 are proposed to be managed as "stocked" streams when wild trout populations have been documented, including wild brook trout. Stocking over wild populations reduces wild populations through resource competition and commingling of genetics between wild and stocked/domesticated fish (fitness). Managing reaches of streams/creeks as stocked versus wild is not scientifically sound. Fish will readily migrate up and downstream depending on environmental factors. Unless there's a physical barrier preventing upstream migration, there's no way to prevent stocked fish impacting wild fish populations in the wild trout creeks and their tributaries. There's no way to control downstream migration since fish can pass over dams/barriers, through culverts, etc...

   Also, the management plan fails to acknowledge the lack of stream classification updates based on recent surveys. It is my understanding the classifications have no been updated for approximately 30 or more years. Recommended updates has supposedly been proposed but no action has been taken. Proper trout management requires that the stream classifications be updated to properly regulate and protect streams with wild trout.

10) Hi I live in alden was wondering if Elliott creek could be stock in alden. There are some deep holes there with good moving water. Home Rd has property owned by the county that could be used maybe along with north Rd sand ridge Rd and random Rd. Maybe some bigger size breeder fish would also help in existing stocked streams for potential wild fish in future instead of just one and two year old fish.

11) Longtime angler from region 7, mostly trout fishing growing up on Skaneateles creek. As you know Skaneateles was made CnR decades ago mostly because of the PCB contamination. The lower reaches (from below Skaneateles Falls basically) are an absolutely amazing brown trout fishery. I've caught plenty of 15+ plus wild browns from there in all times during the season. I

think the idea of a year round Catch and Release would make sense on a stream like this - and thus I think it can be easily extended to the rest of the state.

My main issue I guess is with the fact that a stream like Skaneateles creek could never be considered Wild Premier - or even something like Wild-Quality specifically because of the size of the creek. I think maybe that consideration should be taken out and instead you are just very judicious about who you award those streams to based on the other criteria. Imagine all these little towns and villages with these beautiful and pristine trout streams that could market their local economy around this resource. I feel like it would then cascade and help people in even small communities rally around protecting their own watersheds. Just an idea!

As the last thing - the only thing about Skaneateles creek that I have always wondered is this: Has anyone ever thought of reconnecting the stream back to the lake? Right now the stream has a barrier and intake the stops the natural exchange of larger fishes - like rainbow trout, browns, landlocked salmon. The DEC years ago attempted stocking landlocks in the creek - but the barrier usually prevents anything from actually traversing from the lake into the stream. Perhaps this is done so fish can't come back and spread any invasive species?

Anyway - thanks for these rules, I think they will be good!

12) Thanks for asking for all anglers advice. I'm afraid, certain that your new plan trout stream management plan will hurt the ecosystem. The upper Delaware is among the countries best trout fisheries. Bc of you and anglers who care about its long-term prosperity. Allowing people to fish the tribs to the Delaware all year. Will greatly impact the wild fish population. People travel from all over the world for a try at these fish. It would greatly diminish the money the delaware, and the state of New York brings in each year. Please keep things the way they are. Thank you for all you do!

13) I've lived in machias my whole life. Caught plenty of carp and pike and chubs, rock bass, largemouth bass, bluegill of ischua. But never a trout. Instead of polluting certain parts of ischua my advice is spread it out. I've walked the train tracks all the way to franklinville they're are some great holes for trout. Sure trout can move in them spots by migration. But I feel like them stockers usually get caught before they get smart or they get smart and move into smaller stream tribs of ischua. Just a shame that you guys don't stock in machias. Behind the machias park is perfect trout cover and amazing rapids and holes. Also creeks like fork. Personally I would stock heavier them creeks have so much potential. Another thing I would do is watch lakes near Amish. I've seen plenty of times Amish at case lake fishing the spillway in the spring and fall (when the trout seem to swim into the spillway tanks often probably due to spawning or whatever) but either way I've seen them with buckets full of trout. I used to think that was a rumor but it's not! So I would monitor lakes that are stocked more and put more trout in streams then lakes if it was me!

14) As an avid fisherman and conservationist in the Rochester NY area, the two biggest issues I come across locally are excessive littering/trash, and illegal fishing tactics (snagging, redd fishing, etc) and keeping fish out of season and over limit. And now with the trout regulations changed for this season I'm confident it will just be worse this year.

My honest opinion is to monitor the local tributaries that have known issues a little more than normal, possibly some new signage that can be placed in heavily trafficked areas that say "THIS AREA MONITORED BY NYSDEC", with a photo of a camera on the signage as a scare tactic even if there's no obvious cameras in sight. It might help as a deterrent but definitely wouldn't completely stop the issue. I personally have called in multiple times throughout the year for trout and other fish regulations being broken but I am aware of how thinly the officers are stretched throughout the county.

Aside from doubling the amount of ECO's in the state I know there's not much that can be done, and even that wouldn't fully solve the problem. But hopefully something can happen before the resources are strained beyond their tipping point of recovery, and before the abusers of our local resources ruin it for the rest of the people that actually appreciate what we have access to.

Thank you for your time.

15) I've reviewed the Draft Fisheries Management Plan for Inland Trout Streams in New York State and overall was very satisfied with the new proposals. I have a broad range of experience fishing for trout in the Catskill and Adirondack region for the past 20 years. Though my two qualms with the plan are centered in the Catskill region, which is where I live, so I fish these rivers almost daily.

    1) I would not like to see year round fishing in the "wild-premier" Delaware River. I find that year round fishing in the "stocked" and "stocked-extended" rivers and streams only would provide anglers with ample opportunity over the winter months and would not compromise any spawning grounds of rivers that are not stocked.

    2) As someone who has fished the Catskill Region for as long as I have, I have fished many of the streams and rivers the area has to offer. I see that the Neversink River in Sullivan county is under the management category "stocked-extended" and is a high priority to be resurveyed. As someone who has fished the river many times, the wild trout population appears to be comparable to the Delaware Tailwaters. If necessary, I could provide ample pictures from myself and other anglers to support my claim. I understand that a resurvey is necessary, but I am 100% confident that this section of the river could be managed under the "wild" category.

16) I would like to see more done on native streams like Lime Lake outlet and Clear creek. Like shocking to see what size and #'s they hold. I wiuld also like to know what is being done about log jams and beaver dams on Lime Lake outlet there are many log jams from Delevan N.Y. down stream to where it meets the Elton. And up steam from warden rd there are lots of beaver dams that make them impossible for fish to pass

17) Restart of stocking on Grindstone creek. The creek was stocked for many years then nothing. We still get descent numbers returning. Including browns salmon and 2 different rainbows. 1 spawns in the fall and the other in the spring. I've seen stocking at the mouth in selkirk park, but many of the birds such as different gulls and cormorants are eating them like candy. You wouldn't believe how many they eat for hours. Its ugly. Would also like to see North sandy creek also see some stocking. Not only in South sandy creek. I could even arrange for a place to stock on bottom of North sandy creek.

18) Good afternoon I am [redacted] from Salem ny. I’m only 15 years old but at this point I think the trout stocking are basically pointless. I’ve been fishing the battenkill since I could cast my own rod and I have only kept fish that need to be kept because of injuries or something along those lines and the fish that are kept go to someone In my community who would like some. But the other side of the story is I see a stock truck dump some fish in and the next hour there is 100 people there pulling them out left and right and keeping there limits everyday on stockies. My point is what’s the point in dumping all the money into stocking if people are just gonna go and rip them out left and right I understand young kids having fun but adults just filling there pale is really hurting the river. In my opinion something needs to be done about this I wouldn’t complain about catch and release the whole river but maybe they is a option

19) I really like being able to fish for trout in the year round sections of limestone,butternut and chitttenango creek along with chenango canal. I woukd love more strams like this.

20) I disagree with the complexity of the your trout proposal! The five categories are confusing as heck. Let me pull my fishing manual out, so I can figure out what I've caught and whether I can keep it or not. By the time you figure out what you have, the fish is already dead or dying. Please keep it simple! A trout is a trout, whether it's wild or stocked. Your fish is too long, so you can't keep it? Let's not be making restrictions that make violators out of good people. The last thing you want is to drive more people away from fishing by ticketing them. JMHO

21) I am writing to express my agreement with the newly released "Draft Fisheries Management Plan for Inland Trout Streams in New York State."
I reviewed this document with a special interest in the focus placed on the protection and identification of Wild Trout and their habitat. I am involved with the Trout Power Organization and have participated in citizen science opportunities to study the presence of wild brook trout in and around the Adirondack region. I agree and support this proposal and will continue to dedicate time and efforts to catching, identifying, releasing and protecting New York State's wild trout fisheries.

22) Just read the draft plan, very nicely done however I have a few comments and concerns.
First comment pertains to the lack of Macro invertebrate mentions. The best trout habitat has great populations of aquatic insects, thus any plan should include mention and perhaps information about pesticide use near wild trout streams at least. Farm chemicals might be included near trout streams as well. Its bad enough that cows use the Otselic just downstream for the DEC hatchery and with no vegetation along the stream it can warm up quickly yet that is a trout stream. My point is that a plan is great but we don't even work with the policies in place to help farmers protect their cattle and the stream. But the issue of farm waste and chemicals and pesticides be of concern to protect the insects, if there is cold enough water, its not about stocking trout to make fishing good, its about protecting the trouts food supply. If there is cold water, oxygen, the water is clean and support macro invertebrates trout will show up on their own. So in a plan there should be something about how to increase, mayfly, caddis, stonefly and other trout foods. In Cayuta creek there is plenty of clean cold water and wild brook trout but DEC keeps stocking browns and some rainbows in what could be a wild brook trout fishery, I was told that DEC only stocks BT in streams that have cold enough water, well thats Cayuta creek above Van Eten. But what happens here is not just a competition between trout species but for mer survival for food, with the large numbers of stocked fish and wild BT all the food resources get stretched thin, and hatches don't really happen as well as they could because the trout eat everything in sight. But if the stream was managed as a wild Brook Trout stream the food supply would be adequate for the wild fish alone.

Second concern is what I am seeing on the west branch of the Delaware river, flows are being manage for the profit of guides farther downstream. By this I mean 500 cfs or more is what is needed for drift boat operations Hale eddy down to the main stem. This is not a normal way to run a tailwater system and any trout plan should contain a statement that tailwater fisheries be managed from the Dam downstream as far as possible which for the WB is 350-400 ifs minimum flow year round. That does not mean all the time its the minimum flow, there would still be opportunity to use drift boats when water is needed as per the flow regulations for the Trenton water supply. The 350-400 Minimum flow was suggested and tested a few years back and the fishing and fishermen were there in Deposit in good numbers, In the last few years the level seem s to have increased making fishing in Deposit difficult without a drift boat, the water is barley 50 Degrees F, so the hatches are not what they used to be. My concern is that a fishery should be managed for the trout food supply, 350-400 keeps the river wet from shore to shore and covers most of the rocks that cause heating on hot days, this level protects the insects, makes it safer to wade, increases the numbers of folks fishing in Deposit so the money spent there stays there. FUDR use the economy as the best reason to manage the flows better, but they are guides for the most part and based in Hancock. The higher flows also changes the fishing in Calicoon farther downstream. So this new flow system seems to be managed for the profit of a few while changing the system above and below Hancock. Two groups of sports men suffer for the good of

one. FUDR claims to be for the fish but the fish were there way before their flows and the fishing was better upstream in Deposit. So my concern is that tailwater fisheries need a plan all their own and it should be to protect the insect populations, the trout will be there if there are good hatches.

So I would like to see more about the Macro Invertebrates in the trout plan, the best way to make great fishing for trout is to focus on the insects they feed on. Thank You

23) The East Branch of the Croton river in Brewster New York, from the Sodom resevoir needs to be catch and release only. I can get 100s of signatures signing a petition for this. I believe this needs to happen.

24) I love this idea! The fishing has gotten much better since I've started trout fishing small streams in 2010. I would love to see and would support as well as share the idea of this program.

25) I like the emphasis on trout habitat. I do support the average size of the trout being stocked to be of a larger class. I am completely against any longer seasons and catch and release. Trout are so much more susceptible to harm than most fish species. People don't handle them very carefully and are dropped often causing harm. And most stocked fish swallow the hook to a point that removal is not possible without harming. I would also recommend lowering daily limits. Especially on fingerlake tributaries. Drop from 3 to 1 trout per day. I hope you take these suggestions into consideration. Thank you.

26) I just reviewed the draft Trout stream management plan for the inland fisheries. I have to say that it all looks very good. I had some concerns in the earlier section (or maybe just general concerns) and was very pleased to see them addressed.

I mostly fish the tributaries in the Rochester area and I think all of the fisheries could use much better signage and I applaud the effort to simplify the regulations and improve the angler education. I hate having to be "that guy" letting someone know what they're doing isn't allowed. I also think that it is wonderful that you are planning to increase know-how on habitat work. All seems good. I only wish there were more brook trout water near me!

27) Change the trout limit to 3 trout at 14 inches, stock all 3 rainbow,browns,brooks and Artificial lures only that way you can release the trout without harm.

28) Good afternoon DEC officers . I consider myself one of the more dedicated trout Anglers in the Syracuse Area. I Think the plan You have drawn up is a solid base for improvement for our upstate Anglers and Streams . I'd Like to see more habitat adjustments throughout the Syracuse Area . Like the one in Marcellus Creek although our harsh winters take a beating on the work you do, its still beneficial to the trout population to increase stream flow and provide these species with varieties of hiding areas. Have there been studys to see how many trout actually breed in these body's of water and the percentage that make it to adulthood ? Seems now any days we are catching tons of stockies. I'd also like to see increased patrol in many of our streams due to many anglers not following fish protocol ,I understand you can't be twenty places at once but this a main reason we see fish population decrease from anglers not respecting limits . Myself im a catch and release man . Also another issue I see often is anglers don't properly know how to handle these fish and they eventually die from being handled incorrectly. Noones perfect, maybe when we give the Liscense out we give out a printed page of handling fish correctly. Is there a reason we don't develop a stream raised fish by releasing them into there natural environment to grow up naturaly . I Could Go on and on and I'm one of hundreds that have Emailed you but I'm all for trout management clean streams and population increase for our body's of water . I'd also like to see trash cans put at all fishing access points to makes sure these anglers do not continue to liter all over these streams that's a major issue . Thank you for you Time . Live, Laugh, Fish On, Life's Good .

29) There are several streams in Westchester and Putnam County that are heavily populated and get fished out within a couple of days. These streams should get more stockings for the amount of fisherman/preasure they receive. The same goes for the local reservoirs. They get two to three times the amount of fisherman that they used to get just 10 years ago. Stocked trout dont stand a chance to grow like they used to.

30) As a trout fisherman of 60+ years I would like to commend all the individuals involved in putting together this thorough and complete plan' Mainly fishing the West Canada Creek all these years, I would like to address the habitat protection portion as it applies to the West Canada. The current hydro power operator, Brookfield power seems to have a total disregard for the environment of the stream bed. They release outrageous amounts of water in a very short amount of time putting anglers lives in jeopardy. This also scours the stream bed disrupting insect larvae and any spawning. Why can't the outflow from Hinkley be equal to the inflow from the 2 main tributaries. This would preserve the lake and stop the wild outflows down stream. I'm sure they have a powerful lobby in Albany, but as your mission states " Mission: "To conserve, improve and protect New York's natural resources and environment and to prevent, abate and control water, land and air pollution, in order to enhance the health, safety and welfare of the people of the state and their overall economic and social well-being." In my opinion this is not being fulfilled in regards to the West Canada Creek. Thank you

31) Hello my name is alan. I fish a lot of trout streams in ny. I love trout fishing so much i travel out of state to try out other places. My go to trout stream is oatka creek. I grew up with this stream in my back yard. I am 39 years old and i have watched the stream change a lot in the past 10 year. There are a few issues i have noticed. First one is i never see any DEC officers there after april 1st. And it is very disturbing to me that i see people taking fish that are not of size and they take more than allowed. Also when the stream is low there has been a huge amount of northern pike that are feeding on trout. In other states i have been in you can buy a fishing license but to fish trout you need to also purchase a trout tag. So the only way you are able to fish in trout streams is to purchase this tag. I also feel there should be some dredging in the stream to allow trout to get away from pike and other predators. Honestly if it was up to me the amount would be dramatically lower as well. I seem to be catching way more stocked fish than i used to. There also is the option of only allowing trout to be taken every other year. Lets get strict with some trout laws!!! I would hate to see my grandchildren to never get the chance to catch native fish. Thank you for your time.

32) I am in favor of extending catch and release seasons on all trout streams.

33) if the dec wants input on trout streams from anglers thats a good idea talk to people that fish in nys streams rivers ect i enjoy fishing in central new york state since i was 3 fishing with my grandfather taught me about bein outdoors hunt and fish FISHIN GREAT IN NEW YORK STATE

34) Good day I am an avid fisherman, science teacher, and Marine Corps veteran I am also a big proponent of not stocking certain streams that have good populations of wild fish but instead improving the stream quality as has been done on the Battenkill by the Clearwater Trout Unlimited group. I still like going to the Farmington in CT, Ausable in NY, or used to like going to the Kayerdeross in NY(before the stocking was all from the bridge once a year) and catching lots of fish with a good opportunity at wild fish so I am not against stocking, just against stocking where wild fish are well established. I heard about the recent choice to stock the Hoosic and was appalled.! It is one of the best wild trout fisheries near the capital district. People come from several States away come to fish the Hoosic on the Massachusetts side because of its wild fish we should manage the New York side as well. That means no stocking it has a well established population of wild rainbow trout that are as hard fighting and beautiful as any in the West Coast. The Brown trout there are also extremely amazing. The Chittenango in central New York is another stream with an amazing population of wild trout and there should be no stocking their. I

see what happens each year when they stock the Housatonic river in Lee Mass all the wonderful wild trout are nowhere to be seen for a while because of the in flow of non Wild fish messes them up. It does so and other places and they breed with the existing trout and it weakens the genetics. If stocking is to occur in certain streams, why not go back to the old ways of asking people to help out with 5 gallon buckets and bring them to different holes or runs. People are happy to do it because then they know where the trout are and it brings people together too when they work together. I remember doing it as a kid with Peter Bagley and later with Tate Bagley who are conservation officers in Connecticut. I think trout management of the river and improvement of habitat is most important. Take some cues from the Clearwater Trout Unlimited about their successful efforts on the Battenkill if you need an action plan. The last point I want to make is that people's wants and needs are changing. People want to catch quality fish. The quality fish are usually the wild fish they have good genetics they can survive harsher conditions and often get bigger and prettier than stocked fish. Or they are gig hatchery fish. Also More people don't need to eat the fish they catch so it's not all about quantitee of poor quality fish these days, That is unless you're talking about tasty Brook trout, then quantities are more important, but they are few and far between except in the Adirondacks and even there you don't see as many. People that are willing to spend more money on gear and travel to come to New York to catch quality fish and that means wild fish. That is why the Delaware is so popular because it has big wild fish. Or they want to come because you have really big stocked fish. I usually forgo fishing close to home in NY and travel an hour to fish the Hoosic in mass for it's less numerous bigger Brown and rainbow trout that are wild. But I will travel an hour to fish in Vermont on the Walloomsac To catch giant stocked rainbow trout.
I really appreciate the opportunity for a public comment. I try to do as much as I can because I remember losing a wonderful early season Pike spot in Connecticut because not one fisherman replied to the public comment about closing the stretch of water at a certain time of the year. I called the biologist and he said that it was great to hear from a sportsman, but wished we replied sooner since he didn't support the closure either. It woke me up. Thanks so much for your efforts and support

35) I would like more fish ladders placed in streams for trout to have more space to naturally reproduce. Specifically Thatcher brook in Gowanda. There is a damn that stops these fish from migrating up stream where there is several miles of spawning habitat. I do not believe there is any use for this damn currently. Thank you

36) Hello, I would like to voice my opinion on the current stocking program. While I support the extra help to promote anglers hooking up with more fish. From what I have found is yearly stocking efforts hurt wild fish breeding patterns. Although brown and rainbow trout are not native to NY streams, the yearly stocking causes large amounts of competition for breeding fish including the native Brook Char. My suggestion is possibly attempting a 3 or 5 year breeding cycle on stocking fish on a few streams and monitoring the outcome. Out west with the salmon runs there have been numerous examples of leaving wild populations to prosper on their own by tightening angler restrictions for a few years to give the opportunity for the wild fish to bounce back and many of these experiments have been a success. As a result of the over stocking of trout it is causing our rivers to be filled with clones yearly and destroying wild gene pools and thus making the fish less able to fend off disease, predators, and less likely to thrive in the wild. I understand many anglers would probably disagree with this point of view, as someone who spends at least 4 days a week on a trout stream, this is just my opinion.

    Thank you for reading this and thank you for considering a renew of our outdated stocking programs!

37) As I lifelong resident of NY and an avid outdoorsman I have fished many of New York’s trout streams. Most notably and my favorites being the tributaries to the finger lakes. I have been fishing Catherine creek in Montour falls and Watkins glen since I was 8 years old. I am low 41, and I never miss an opening day on Catherine creek. Over the past 33+ years of fishing Catherine creek I have seen it change so much. I remember back In the hay day when you could

keep three trout and would see many mAny anglers with limits. Then there were the years were the run was super early and it was nothing but suckers all season. Plenty of floods rearranged a lot of the good cover and habitat on that stream. Most notably a couple of the spillways that were hotspots for many years have been taken out by high water. This areas held fish so they could rest under cover before continuing their journey upstream. I would love to see these spillways replaced In the stream. It would create much needed habitat and cover and provide areas for these wild trout to spawn. Thanks for your time.

38) Let me start by saying that I am very pleased to see the NYSDEC making plans to protect "wild fish" and attempting to make fishing better and more accessible in NY State.
In the case of protecting "wild fish", everything starts with education. Reaching people with a clear message as to why it's important to protect our fishing resources in general and especially the "wild trout". Those wild fish and those environments in which the "wild" thrive are unique treasures. Example: Powder Mill Park on Upper Irondequoit Creek. This is a cold spring fed creek with with wild fish, great substrate and cooler water all year around. The current policy is "catch and kill" throughout this unique piece of water in the park and its practiced heavily. At the very least, parts of this park's water shed should be "catch and release" to offer year around opportunities and to protect the many "wild fish" there. Heck, there is a private hatchery right there. What a great opportunity to work with existing infrastructure and create a "Center of Excellence" for the Upstate, NY community. Instructional classes on proper fish handling, releasing of trout, the use of barbless hooks and much more could be taught there to the community at large. Education in terms of informational kiosks, current signage on the creeks, ECO enforcement of new policies, and more are what is needed and what the fishing community is loudly asking for. Maybe selecting a few choice streams like Upper Irondequoit Creek Powder Mill Park (Rochester area) would be a modest start to the process. Upper Cattaraugus Creek might be another (south west of Buffalo). There are plenty of big, wild trout scattered throughout Upper Cattaraugus.

At some point, all of these waters were stocked with Brown Trout. So; in theory as in practice, stocked fish beget wild fish. We need to protect all of the trout resources we have; stocked or wild. With that, I would like to see more protection of our stocked resources as well. In many instances, the stocking truck will show up and make its dump only to have the same group of anglers aggressively string up a creel limit of 10 inch fish day in and day out until they are depleted. These guys dont even let the fish acclimate for 5 minutes. Crazy. That to me is an abuse of a resource by the anglers in this case and and abuse of tax dollars.

We should entertain:

1. Pulse Stocking of the resources throughout the spring and fall seasons should be practiced.These stockings should not be announced as to where and when and would offer anglers a chance to have trout swimming around in good numbers all year.
2. Float Stocking on certain waters to help spread the stocked trout throughout creeks and promote wild strains through natural
reproduction. Also, taking pressure off the "usual stocking spots." Grouos like Trout Unlimited and International Federation of Fly Fishers would be very glad to support these efforts year over year. Free labor!
3. Stock most of the 2 year old fish away from the traditional "dumping sites" such as bridge areas. Maybe we float stock the 2 year olds only. These are fish that are "of age" and could spawn if they adapt nicely.

The ECO, and DEC in general have a responsibility to educate the fishing public on all matters fishing and do a decent job of it. However, we are very limited on ECO's and the DEC cant spend much time educating. I propose a partnership with all NY State licensed Fishing Guides in some way on these matters. We are free labor and the 1st line of "eyes and ears" on our creek

systems. I also think there needs to be a better social media presence by the DEC in order to reach the general public on educational matters. Facebook, Instagram, Twitter, etc are the places most anglers congregate these days, including fishing clubs and organizations. A more current and interactive web site might be a great way to educate with success.

I would like to see the creel limit reduced on Oatka Creek and others from 5 trout (2 over 12 inches) to 3 trout per day (1 over 12 inches). More catch and release sites throughout the states fishery is what many are asking for. I currently work with the Lake Ontario Fisheries Management Focus Group and would like to help with the inland fishery as well. If there is availability, I would like to participate with a DEC Inland Fishery Focus Group

39) Oatka Creek above Bowerman Road to Wheatland Center Road appears will be designated as a Wild-Premiere trout stream. At one time as recently as 6 years ago it was. After two severe winters characterized by multiple "polar vortex" events both Oatka and nearby Spring Creeks were discovered by starving Mergansers. As a result the biomass in both creeks was severely reduced. Mergansers now regularly visit the creek throughout the year continuing to depress the trout population. The creeks have not recovered. I understand Mergansers are a significant problem on other streams throughout the state. I did not see mention of this problem or solution to it in the Draft. This problem must be addressed if the potential of Oatka (and other) creeks will be reached.
40) While I strongly support the new plan's emphasis on preservation and protection of wild trout populations and trout habitat, the proposal to open the trout season during the Fall-Winter spawn threatens the quantity and quality of wild trout in the Catskills. If this becomes law, NY may sell a few more licenses, and there may be a few more days of fishing by those (fool)hardy enough to brave Catskills waters in the dead of winter. But, the cost to the fishery — reduced trout reproduction and increased trout mortality — is not nearly worth it. Moreover, the inevitable targeting big female spawners at their most vulnerable is just not fair chase. Hopefully, NY will reconsider and exempt the Catskills, but regardless, won't catch me wading or fishing over the redds; just because it may be legal doesn't make it right.

41) Balancing ecological restorations with human (angler) interests is a complex and sometimes conflicting project. I think NYSDEC has put forth a very good plan. I'm especially encouraged by the use of the 3 "wild" categories. Here's hoping your hard work pays off. Great job!

42) In response to the talks held around New York on the proposed regulations, I personally feel that any stream that is designated a wild stream should not have any stocked fish put in it. I know what your criteria is, but we must start thinking about our native fish and not the almighty dollar from licenses.
With that being said, we all know stocking is the way of money for the State. Maybe before stocking streams just to have them fished out within two weeks in region 7, less fish be put in and increase the time longer than one month?

Maybe more Officers to check streams since people care less about regulations and take as many as they can. A good idea would be to hire ex-police officers part time to help encon officers?
43) As a former DEC career employee now retired, I am pleased to see this Plan initiative. In my early years with the Department DEC had an active Trout Stream Improvement field program, to enhance and maintain stream habitat quality. Regrettably over the years this program fell into demise with consequential wide spread stream quality deterioration.
It's truly sad to see so many previously productive trout streams no longer capable of sustaining year round Trout populations. It's sad to witness the deteriorated current condition of so many previously productive NY streams, with broken down stream improvement structures, eroded banks, silted stream bed's.

I seriously don't see how DEC can justify expansive fish hatchery programs only then release fish into unsustainable streams.
I do hope this new planning effort can lead to stream restoration, at least to some former quality streams.
Thanks for this Plan undertaking.

44) The biggest problem with trout stocking lies in the fact that fisherman know the stocking locations and fish them out in a matter of days. The trout don't have time to acclimate to their new habitat and spread out. If the stocking was done in the fall once the season closes, the trout would have time to spread throughout the stream making fishing much more enjoyable than having fishermen piled up around these stocking locations and catching all of the fish.

45) Congratulations on an excellent process and product. The draft plan overall is an impressive improvement to Trout stream regulation, and will no doubt increase the satisfaction of anglers involved in stream fishing while protecting trout and their habitats.

There are many significant improvements in the regulation, and I will not take the time to detail all of them.

There are a couple of items that are either omissions or oversights that I feel are important enough to raise.

Firstly, I did not see specific discussion regarding the use of particular types of tackle, live bait, and barbed hooks, as related to wild, wild quality, or wild premiere. There seems to be an opportunity here to protect these fisheries by spending a little more time describing the deleterious effects of some of these techniques on fish survival. For example, if you continue to fish a productive deep hole in the mid-summer, in a quality or premier trout stream with Barb snelled hooks and grasshoppers, after keeping your two large trout, you are going to kill more than two large trout, even if you release large trout number three, four and five because they are too big for the regulation.

Secondly, and perhaps more importantly, there seems to be omissions of important streams especially in region 6. I could find no mention of the North Branch of the Moose River, the South Branch of the Moose River, the Independence River, Twitchell Creek, South Inlet of Raquette lake, and a number of others that are all fisheries of interest that should be categorized. Will there be further additions to appendix two?

Thanks once again for these efforts, and for the highly transparent and participatory process.

46) From my rather limited perspective this draft appears to be well thought out, and I appreciate the effort that must have gone into it. My compliments the the DEC staff, as well as other the individuals who contributed to its its development

47) So elm creek in Cattaraugus and clear creek are classified wild premier. I've been fishing these creeks for 65 years . Angler pressure greatly ended when the stocking of hatchery trout ended. I very seldom see anyone when I'm fishing especially after two weeks of the opening of the season. My concern is one fish any size makes no sense in these two streams. I'm 77 years old in excellent health and can walk up and down these streams that are almost this time of year very difficult to fish. Last Saturday I fished to the mouth of elm creek , have people in this study tried to fish the holes down that way. Most if they did would never go again. And up the creek is no easy task the farmer has bulldozed all the brush towards the creek if you don't carry, which I do, a clipper to cut the pricker bushes it's impossible to access the holes. Other concern is I drive 20 files to fish and first hole I catch a 5 inch brown trout that isn't going to survive. I made my day. This one fish limit is just a way for the fly fisherman to have their own streams. Fishing pressure doesn't exist in these two streams and the fly fisherman have from October to April . Looks as

though taking the same theory making sure hunting deer you have restriction on antlers. Wild trout just don't feed like a stocked trout they have to have their day so not that easy to catch five trout and two more than 12". Just close the season if your going to go to one fish in this so called wild premier.

48) No thanks to your DEC website for not having a readily available form or other method for the comments I found an invite to in my Rome Sentinel paper a couple days ago. Included in the Sentinel article was a list of topics for which the DEC was requesting comments. No such item found on the DEC site.
So I'll give you one item that I thought of, the use of the Mohawk R. in Rome north of Delta Lake at the Westernville Bridge. For some reason the bridge and south to the lake is not opened for trout on April 1, only the river north of the bridge. Further, why can't the bridge parking area in Westernville on the village and Lee Ctr Rd be designated as a NY State fishing site like so many others locally for West Canada Cr. in Trenton, several sites on Oriskany Cr in Clinton and elsewhere, possibly with expanded parking north of the bridge instead of a water logged dirt road which is usually 'proceed at your own risk, your's and your car.' Even drier seasons the road is practically impassible.
There you have my contribution.

49) I have reviewed the proposed inland trout plan. I am an experienced inland trot fisherman with 50+ yrs. experience.
I have the following comments:

- Curtail/Eliminating Put & Take stocking. Eg. Dumping 2300 rainbows in Cayuga Creek EVERY YEAR!
- Trap & Transfer wild trout when electroshocking into streams that need replenishment such as Clear Creek in Wyoming County
- Stock LESS 8" fish in favor of 12" fish
- Stock less fish downstate! Why are Suffolk and Westchester getting disproportionally more fish with LESS fishermen???
- Young Anglers; the DEC has ignored young anglers for generations and the learn how to fish programs are NOT working. Develop an mentoring program with experienced fishermen.
- ELIMINATE the 30 yrs. of inbreeding in the hatcheries. How could this EVER even happen!
- Older Anglers: No programs for them! How about some senior restricted easy access. The older anglers are not hitting the streams because they can't get into ravines, etc. anymore.

50) I have some recommendation that can improve trout stream plan. This can be applied anywhere but mainly it is for Irondequoit creek in Penfield, New York. There is a section of creek that has all rocks at the bottom in Linear park, Penfield, NY. There are just a few deep holes that hold fish all year long and these spot are very often not available because there is too many people fishing. So the option is to use heavy machine and create more deep holes 4 - 6 feet deep. That way there is going to be more fish, more fishing spots and there will be less people in one small area. I like to walk from a spot to spot and fish and very often I end up going home unhappy as those spots are taken by other fishermen. All you need to do is to move rocks or bring a few larger rocks to prevent flood to ruin your work.
In the fall large fish would come from Ontario lake (Salmon, Steelhead and Brown trout) and they will stay in the creek until late spring. This fish will occupy deeper holes and stay there for a while and more fishermen can enjoy fishing and bringing younger generation. That way our kids can spend more time outdoor instead of playing games and using electronics. Overall it can improve the quality of our life.

I hope this can help.

51) I offer the following comments on the proposed draft plan.

In general I feel that the plan offers a very conscientious and and productive plan for managing the state's trout fisheries. The time since the previous management plan was drafted and implemented mandates that an updated and relevant approach be considered. This current draft represents an enlightened approach based upon science and experience with great consideration of anglers and there concerns. I heartily support adoption and thank those responsible for its development.
The concentration on wild trout especially through habitat improvement and enhancement is a fine approach and one that could engender great stewardship partnerships with angler groups. Aside from the direct benefits of trout health and better fishing conditions, the ability to draw constituents in to volunteer has enormous benefits. Most notably the ability to improve understanding of ecosystem dynamics and the angler's role in sustaining habitat will expand the reach of efforts beyond the dollars spent.
Stocking with an eye toward minimizing the surge type of fishing we now see will also pay dividends. Spreading the stocking over time and introduction of larger fish will make the fishing experience better for a longer duration and for more people. I suspect this will also improve survival rates and disperse fish away from stocking points to some degree.
The extension of seasons to include fishing all year will be a great thing for people (like myself) that fish all twelve months. This has been too long in coming and I am extremely pleased to see the matter addressed in this draft plan.
Any effort to emphasize and concentrate on wild trout and wild trout habitat is also a great benefit. I suppose that this is also tied to this "classification" system to some degree which also has been too long in coming. Compliments to the NYS DEC for adopting a focus on wild fisheries as a major component of this draft.
Thank you for reaching out with this draft for angler input.

52) I have just completed a reading of the draft Trout Stream Plan and have much appreciation for how this draft plan has addressed in a comprehensive manner how to manage Trout in New York State. I as a member of Western New York Trout Unlimited (068) support this plan.

53) I would like to thank the people at the DEC Fisheries Unit who put this plan together, and to thank you for all of your hard work. This is not a perfect plan nothing is perfect, but I think it is a excellent plan and something to build the future of our inland trout stream management on. I particularly agree with the year around trout fishing, habitat, and the better quality of stocked trout in the proposal. This is long over due, it is looking to the future, and a job well done. I wholeheartedly approve of this plan.

54) Please address the management of red-breasted mergansers that have become year round inhabitants of many western NY trout streams over the past 5 years. They are now nesting in these habitats and are constantly present on these streams year round resulting in high predation rates on native trout populations. They were rarely seen before the 2 back to back very cold winters of 2014 and 2015. They flocked to these streams during those polar vortex themed winters as they were the only open water in the region and never left.

55) First of all, thank you for taking steps to try and improve, and review trout fishing in New York, I think there is an exceptional opportunity to build upon the proposed plan, and increase tourism, plus fishing quality. My name is Ethan Law. I am the Fishing Manager at Orvis Rochester, a board member on Seth Green Trout Unlimited, and a competitive angler who has competed at national championships. I have split my time in the last 10 years between Rochester, and Syracuse. I have included this short bio so you have an idea of where I'm coming from, and know that I have skin in the game coming from both a business and personal point of view. My main concern is some of the stream qualifications, mainly concerning Nine Mile Creek, Chittenango Creek, and Skaneateles Creek. Previously, I have been told there is not enough data to consider these creeks wild, or wild premier. But, if Oatka Creek is Wild Premier, these are of a quality higher than that. I know my own personal experience does not count as data. But, I have caught more wild fish under 6" in a 50 yard section of any of these streams compared to the entirety Oatka Creek. I understand Oatka has had it's issues in the past few years, but these three

Syracuse streams NEED PROTECTION. The opportunity for increases in tourism, guiding, and overall fishing quality is immeasurable. Between myself and Ken Crane of Team USA fly fishing in Syracuse who has years worth of data from competitions, we are more than willing to be a resource and do whatever it takes to help shape the future of fishing, in particular these streams, in Upstate New York.

56) For Wild trout streams, why allow 5 fish/day for the least quality streams whereas premier wild streams allow only 1 fish? Give the wild streams the same chance at successfully reproducing limiting them at 1 fish/day for all quality levels of wild streams.

If someone wants to keep more fish they can fish the stocked streams or go to wegmans and buy some:)

57) Here are my main points of emphasis moving forward to support Trout Fisheries in NYS:

- Greater focus on habitat improvement. Water quality and habitat is critical.
- Increase angler access points and limiting privitazation of trout waters
- Less put and take stocking, more wild trout and sustainable fisheries
- More year round trout fishing and fisheries.

58) I was one of the many people in attendance at the initials meetings that were held back in 2017 that started this whole process. It is nice to see that many if not all of the suggestions raised at these meeting are coming to fruition.

I have reviewed the Draft of the "DEC's New Approach to Managing New York's Trout Streams" and find it very thorough and all encompassing and for that matter way over do.
I feel this plan will go a long ways for improving our New York Fisheries but also the quality of the fish available for the fishermen, notice to expert. We have so many great waters in New York and some are failing do to previous neglect and poor fishing habitat and need major attention. The steps and actions in this draft with emphasis on habitat management for wild trout fisheries and the increased stocking efforts for recreational fishermen should satisfy the needs of many and help support these fisheries well into the future. I have fished in many areas of the state and some are great and productive yet some have fallen in productivity due to decreasing habitat, increased water temperatures, over consumption and takes and many other negative things that affect the available fish in the streams.

Our Wild fish populations are vital to the growth of the fishing industry in New York, whatever we can do to expand these areas and improve the population and quality of the species will definitely carry us and the future Trout Fishing population into the future and make New York a destination of choice for Fishermen around the whole.

I look forward to seeing the improvements in our fisheries and the numbers of fish available for many years to come.

59) I would like to voice my support for the new trout stream plan. I am especially in favor of managing streams specifically for wild trout. I fish about 100 days a year in New York and try to only fish for wild trout. I am also in support of stream habitat improvements as this would allow wild trout populations to potentially flourish and at least allow them a better chance of survival during harsh climatic events like drought or prolonged cold.

60) I would first like to commend the NYS DEC coldwater fisheries managers and biologists, as well as the many citizen conservation stewards for the development of this inland trout stream management plan. This update was long overdue.

Overall, the plan makes much sense, although I do see some unnecessary challenges injected through examining stream "reaches", which can result in different stream designations on one

body of water, which could lead to confusion. Example would be Oatka Creek, where one reach is designated as stocked, with another portion designated as wild.

All in all, however, this plan makes sense, and should address some of the changing angler desires and satisfaction, while maximizing stocking resources to deliver the maximum angler experience for the investment.

I support this plan, with minor concerns over any single stream being in multiple categories.

Thank you for your work in this area of angling opportunity.

61) I live in the Binghamton area and fly fish for trout often. I only fish for trout in PA now due to their great stocking program. Pa stocks bows, Brooke brown and palominos of various sizes in all their streams(Susquehanna county)My question to you is, why are their only browns in creeks and Bowes in lakes in the Broome county area? This is killing the trout interest in NY. There are other streams in the Broome county area that would benefit greatly from stocked trout.
Coconut Creek in Vestal is a wonderful habitat for Brooke trout. Very shaded and colder stream. I fish the other end of that stream where it heads toward PA and it is awesome. Please consider stocking brookies and bows in the Broome county streams and stocking Choconut Creek in Vestal NY.
62) Over all plan looks good , should benefit resource.

63) I think it's a good idea to have year round fishing for the stocked streams that don't have native Lake run fish. But...I can only imagine the lifting that would happen on Catherine creek in the month of March during the spawn... Catherine creek needs to be protected because of the amount of people that fish it every year and the fact that the fishery has been stressed due to pollution in Seneca lake, most likely.
Possibly closing off all tributaries to Catherine would help also. Please don't allow year round fishing in Catherine creek!!!!

64) I support year round fishing , most people that fish on the off season are people that are serious about it. they know what redds look like and avoid them . i live in an area that has year round fishing and i enjoy it very much, as a bonus you can have large sections of streams to yourself.
65) On streams that get "stocked" trout, please change "limit" to 5 trout any size. I travel 50+ miles to trout streams,with luck I may catch 2 over 12" early on BUT I'm not going to stop fishing. I honor the law & release any more trout over 12". My lure is live minnows (Certified), will those larger trout survive after being released? It may take several released trout until I get 3 under 12". At the same time I see several fishermen taking more than 2 over 12"! I've attempted at times to try and "educate" them, needless to say this has Not gone well! Change law to say,,, 5 trout any size,,,. Thank you for the opportunity to voice my concern.

66) In the appendix 2 of the plan there are many abbreviations in the reach description but no legend to define them. Looking at them for some time and at a map I believe that "p" is a pond or lake and "t" might be a tributary, however how is one to know what or where T2 or T88 might be? Is there a printed map that might include these designations?

67) I am an avid trout fisherman and I think some trout should be stocked after the season. They will have a chance to move and acclimate to the stream.

68) First let me thank the NY DEC for excellent and very thoughtful work on the Trout Stream Management Plan (TSMP), especially the critical distinction between WILD and stocked trout.
MY BACKGROUND AND PERSPECTIVE

I am 77 years old and have fished for trout since I was a young child. I grew up catching mainly stocked trout in the Catskills, so I very much appreciate that they continue to be available. During

my teen age years I began to focus exclusively on FLY fishing, practicing catch and release of all trout. At age 18, finally having my own car, I began fishing for the WILD trout on the DELAWARE TAILWATERS (DT). Since retiring in 2000, I have been fortunate to fly fish the DT exclusively for 20 to 30 days a year. Simply put, I love fly fishing the WILD trout on the DT and observed changes, good and bad, over the years. I hope my perspective, which I know is shared by a large number of individuals, will be helpful to the DEC in finalizing the TSMP, particularly for the DT, but also all three WILD categories.

LOCATION OF DT; FISHING INTENSITY; RIVER SIZE , FLOW AND ACCESS

The DT are the closest, by far, to the densely populated NYC and Philadelphia metropolitan areas. It is much easier for folks in those areas to get to the DT for even a day or two than any other WILD-PREMIER (W-P) stream in NY. Based on personal experience, FISHING INTENSITY has become very high on much of the DT in recent years, likely much higher than any other W-P stream. This is a testimony to not only biological capacity but to DEC's (and PA's) long standing wise regulatory oversight. Now it is time to update the DT regulations to reflect extreme FISHING INTENSITY and KEEP the DT meeting the OBJECTIVES (abundant larger trout, etc.) of the WILD-PREMIER category for many years to come. While I'm not familiar with all NY streams designated as W-P, I believe the DT is unique in that flows normally permit boat fishing (except for the Upper East Branch during low summer flows) with boat access (including PA sites) widely available . This unique factor also should be considered.

DT TRIBUTARIES

From a biological perspective it is ESSENTIAL that all tributaries to the DT (except, of course, the Beaverkill) have the same regulations as the DT itself. It is well established that WILD trout use the tributaries to spawn, to seek refuge during times of thermal stress and as a nursery for fry. Having differnt regulations on tributaries would serve to defeat the OBJECTIVES of the W-P classification. And, a single category would greatly simplify regulations and enforcement (another DEC goal for the TSMP) by avoiding such issues as where a tibutary ends and the DT begins, which varies significantly depending on water flows/level.

LORDVILLE VS CALLICOON

While the reach below the Lordville Bridge gradually becomes less hospitable for wild trout, quality water does not simply end there as several cool tributaries and river springs sustain some trout in this reach during periods of thermal stress. Importantly, as has been documented in the past, wild trout in this reach will migrate upriver to seek out desirable habitat when necessary. In past years some of the best fly fishing I personally experienced for wild trout was in the reach below Lordville to Callicoon and I urge DEC to include that section down to the Callicoon Bridge. Since Callicoon Creek joins the Delaware below that bridge, the creek would not be a DT tributary for regulatory purposes. Including this reach would also serve to help alleviate FISHING INTENSITY during the spring/ early summer when water conditions in this reach normally remain favorable for wild trout.

BAIT VS ARTIFICIAL LURES ONLY & SINGLE VS. TREBLE HOOKS

The DEC should permit only artificial lures on W-P waters, especially the DT due to its location and FISHING INTENSITY. Every live bait I know has an artificial imitation, so every angler can

still use whatever he/she believes is best as long as it is artificial. I know this topic has long been hotly debated, but a recent scientific study by Washington state demonstrated bait caught Wild Steelhead were 3 times more often hooked in a "CRITICAL" location than artificial lure caught fish. Please see:

http://www.psmfc.org/steelhead/2016/Bentley_Steelhead_C&R_mortality_Steelhead_Mgmt_Meeting,_March_8,_2016_for_PSMFC.pdf ;

Artificial lures only on W-P waters would simplify regulations and help assure OBJECTIVES are realized. And, for anglers insistent on "real" live bait, a large number of streams are open where such bait can be used.

Single versus treble hook use is another controversial topic. Personally, I never use treble hooks anymore (I did in my early fishing years) and my biggest complaint about their use in C&R areas is deformed trout. Removing a single barbed hook is generally pretty easy but removing treble barbed hooks can be difficult and can result in multiple tears and/or wounds to the fish. This is one reason I stopped using treble hooks. I noticed a recent compilation of studies on this topic which points anecdotally to using BARBLESS treble hooks. See https://activeanglingnz.com/2014/08/18/treble-v-single/ Please give this consideration for all W-P waters as it comports well with the OBJECTIVES.

HARVEST STRATEGY: C&R AND WILD RAINBOW TROUT

I strongly support the one trout harvest proposal for Brook and Brown Trout, but favor a 15" minimum size (making Brook at 12 " is an unneeded complexity in my opinion). Unfortunately, even fly fishermen may illegally cull their harvest. For example, you can guess what would happen if an angler kept a small but injured fish since it probably would not survive but later caught the "memorable" fish that might be mounted?

I feel strongly that all Rainbow Trout should be released because they represent a very unique strain found only on the DT in NY/PA. As is well known, Brown Trout outnumber Rainbow trout by a very wide margin on DT and, as DEC wisely proposes special consideration for Brook Trout in Nassau and Suffolk Counties, DT Rainbows warrant an exception due to their unique and rare situation. I'm sorry this would create a wrinkle in regulations (I'm a big advocate of simplicity) but I think science and good stewardship of a scarce resource support "no-kill" for DT Rainbows.

Anyone visiting the C&R section on the DT during prime fishing times knows about excessive FISHING INTENSITY there. Obviously, the popularity of this section (and others like it) is a credit to the DEC for its thoughtfulness in establishing such sections throughout NY. Fisherpersons feel strongly these C&R sections offer them the best chance of catching exceptional or memorable trout and/or catching an abundant number of trout during an outing BECAUSE other anglers before them are required to return all trout unharmed, no exceptions for even a memorable fish. I for one hope the OBJECTIVES of each WILD category is met, if not exceeded.

Thank you very much for the opportunity to comment on the TSMP. I look forward to enjoying great fly fishing for wild trout in New York under these forward looking regulations.

69) Hello. I am writing to comment on the draft of the new Trout Management Plan scheduled to roll out in 2021.

Overall this looks very good and I am glad to see an interest in habitat work - I think this is essential.

With regards to streams designated wild I am perplexed that those streams have the same as streams designated as stocked.

I would think wild streams should have harvest levels that are the same as stocked - extended. Given what we know about migratory habits of wild trout on their spawning runs it seems wise to keep as many of these wild fish in the stream as their overall contribution to the health of a stream extends beyond the summer resident areas of these fish. This was amply demonstrated on the Battenkill when two years of telemetry study showed migrations as far as 15 miles to natal tributaries.

Specific to the Battenkill I do have a specific question and thought.

The question is how are sections of the stream not designated stocked-extended, wild or wild quality managed. As an example one stocked- extended zone terminates at Eldridge Swamp but there is a significant portion of river that is not covered above that point to the Eagleville Bridge. Several such reaches exist and without clear designation this could cause confusion.

As for my thought, I am sure you are aware of the Trout Unlimited Home Rivers Initiative that was launched this year. You may also be aware that the Vermont portion of the river falls into the criteria of wild-exceptional based in the trout population per mile; which has exceeded 500 trout per mile for a number of years.

It would be great if DEC could coordinate closely with Trout Unlimited to launch in partnership habitat projects to bring the Special Regulations area up to a Wild-Exceptional status. The copious and robust data from Vermont validates the benefit of habitat restoration.

70) Just a quick note that I applaud the new approach to trout fishing in New York. I think a new approach is long overdue and look forward to implementation of the new plan. It has always been less than ideal to have to chase the stocking truck and hopefully getting to the stream before everyone else. There has to be a better way. This year with so many fishermen and women being home from work it has been a very poor year finding places to fish and fish to catch. Trout fishing is a time honored tradition and should be treated with respect. Andrew Aiezza TU Member Clearwater Chapter.

71) Wild trout streams should be managed with care can't kill all the fish in those stream if you got to make a one-fish limit and a certain size this would work out really well for the wild trout streams there's some brook trout streams that you may not even know about believe it or not there's right in my neighborhood there is some Trout Brook Trout these stream should be protected with care. No live bait in the Wild stream should be artificials only 1 hook point for each lure you can have up to three flies on your leader. When stocking streams you should have a delayed harvest in other words you can't kill any fish for a month after your stock them and there should be a must it will work out well they'll be a lot of fish for people to catch because if you're a room for a full of a hundred people and you would say what's the thing that you like best about fishing is it catching or killing guess what the answer would be 90% of the people would say catching.

72) Greetings, I am a long time flyfisherman, I belong to TU, BJC. I have been waiting a long time to see this type of pro-active idea brought to New York. Please review the Practices of our sister States Connecticut and Pennsyvania. The following practices should be implemented here in New York.

1- Fall Stocking of trout in selected streams.

2- Collecting eggs from Brown trout which survive in streams over the winter, raise and stock.
3- Strict regulations for winter catch and release.
4- Creation of a Trout Stamp to help pay for these projects.
5- Expanding Fly fishing only regulations in southern NY streams. Wappingers Creek, Ro Jan, Dutchess county, Columbia county, Westchester, Putnam etc.
6- Education for this endeavor throughout NY to highlight the benefits of these practices such as higher quality fishing oppurtunity and higher quality water resources.

73) The biggest problem I see on the stream is a total disregard for complying with regulations. in all my 70 some years of fishing I have never seen it this bad. So, more law enforcement.

74) I oppose year-round trout fishing. The plan caters to human recreation,but it ignores the suffering of the fish. I realize the extended period will be catch-and-release, but this is very painful to the fish and many fish die. Please remove this part of the plan.

75) I understand that it is your intention to extend the trout-fishing season (April 1st - October 15th) so that it will be year-round, and I am writing to register my strong opposition to this plan. Even though the extended period will be catch-and-release, and even though this sounds harmless and sportsmanlike, catch-and-release in fact causes the trout to experience fear, pain, and suffering. I urge you to reconsider. Let the anglers have their half of the year (plus two weeks) in which to fish, and let the trout have their half in which to live undisturbed. Fair, after all, is fair, and I believe that as a government agency, you have an obligation to see this---and any---issue from both sides and to act accordingly.

76) I am turning 65 this August and have been fishing the streams of the Catskills since I caught a sunfish in the East Branch Delaware River when I was about 4 years old. I have a place outside of Margaretville on the Batavia Kill, and I am not allowed to fish the stream on my property after September 30. It's been this way my entire life. I have not kept a trout in many years, and practice catch and release with artificial lures and flies. I am extremely excited of the prospect of being able to fish in the fall, and maybe even the winter, next year after the normal close of trout fishing on October 15 (or Sept. 30 in the East and West Branches of the Delaware above the reservoirs).

This can also help local economies. Many people from outside the area come to fish, and often, those who spend more money (hotels, restaurants, equipment, etc) are not coming to fill the freezer - they are catch and release anglers most or all of the year. This can help to be a economic bridge for some areas after the summer season but before skiing season. Making anglers and local business people happy and doing no harm to the fishery - sounds like a win-win proposition to me.

We have been able to fish Esopus Creek through November 30 for years and there does not appear to be any damage to the fishery there - and that's not just catch and release. I am very excited about this new plan and wholeheartedly support it. There are other states I have fished in the region that do not have this closure - PA, NJ, MD, VA and RI - those are the ones I have fished in and know have close to a year round trout fishery. Please adopt this plan and let your people fish. Thank you.

77) I wish to provide the following comments on the referenced proposal. I support the conceptual approach to manage NYS inland trout streams based upon biological considerations of streams, and their reaches, and not a one-size fits all approach. My support comes with certain considerations and one strong concern/objection. Regarding stream reaches, I believe DEC needs to make available online printable material that clearly delineates different reaches/classifications on every stream where such exists. From personal experience I know there are vast sections of the Catskills and Adirondacks where cell and internet service is not available. Thus every angler wishing to fish a stream containing different reaches should be able to print hardcopy materials before arriving at such destinations. From a personal viewpoint, I

support year-round trout fishing with a no-kill, artificial only provision from October 16th through March 31st of the following year, though I realize this proposal might cause some controversy. I have been flyfishing year-round for trout since 2012, when during the months of December through March of the following year I do so as a non-resident angler on New Jersey classified wild trout streams. I think cold water, snow and ice limit opportunities for successfully angling, however, it's a real joy just to get outdoors, having the opportunity to do so. For decades anglers have fished the Esopus Creek starting April 1st while rainbows are still spawning, and the wild rainbow population is strong, though subject to cyclic fluctuation often due to natural disasters like Hurricane Irene. Plus the Esopus Creek has had an extended killing season through November 30th for years, and wild brown trout are still present. If anything, changing the Esopus Creek killing season from November 30th to October 15th affords more protection to these fish. Plus a statewide no-kill season should disburse angling pressure among many different streams. As for allowing the potential to kill trout out of season, I think the management plan should focus the majority of anglers who will abide by and enjoy these regulations, as opposed to a few individuals who might break laws, taking advantage of them. Where I take strong exception to the referenced document is DEC's classification of the Esopus Creek as a Stocked-Extended reach. I have been trout fishing the Esopus Creek watershed for fifty-one years now, dating back to 1970. During this time I have worked with DEC Region 3 fisheries biologists, and sometimes Region 4 when NYC's Schoharie Reservoir was involved. In the 1970s we have worked together on such issues as cold-water releases from NYC's Catskill reservoirs, in the 80s the Power Authority's Prattsville pumped storage proposal (FERC Number 2729), and recently NYC's renovation of their Schoharie Reservoir facilities and future operations. I have found DEC's regional staff to be dedicated and professional. Based upon page 19 of the draft proposal, a stream can be classified as Wild-Quality if there are more than 300 wild trout per mile. During the evidentiary portion of the FERC Prattsville proceedings, Regional DEC fisheries estimated the twelve mile section of the Esopus Creek between the Shandaken Tunnel outlet and Ashokan Reservoir contained an excess of 100,000 wild trout. Specifically I call your attention to a document titled "Esopus Creek Fisheries Investigations 1975 – 1978" prepared by William H. Kelly and Michael C. Gann of Region 3 Fisheries. Page 23 states, "The Esopus Creek remains one of the finest trout fishing streams in the Catskills. … more than 110,000 adult trout (9,400 trout per mile) are resident in the Big Esopus below the Portal at the start of each fishing season…" This reference is an internal DEC fisheries Esopus Creek report, and even if conditions changed, or there were some errors in the estimation, using DEC's own numbers of requiring 300 wild trout per mile, versus the point-in-time regional estimate of 9,400 trout per mile, that's a factor of 31 times what is required. Thus I take strong exception to the proposal's Esopus Creek reach classification. I believe Esopus Creek from the Shandaken Tunnel downstream should be classified as Wild-Quality, while upstream of the Portal to Lost Clove Stocked-Extended might be fitting. Esopus Creek from the Shandaken Tunnel downstream is a tailwater, much like the West Branch of the Delaware below Cannonsville and the East Branch of the Delaware below the Pepacton. In fact, Esopus Creek was the first Catskill tailwater created by NYC. I sincerely hope DEC will revisit and correct their reach classifications regarding Esopus Creek. As a final note, I have witnessed more anglers fishing the Esopus this season than at any point in my entire lifetime. I don't know if that's a result of the coronavirus or perhaps new easy access afforded by the Boiceville terminus of the Ashokan Rail Trail and DEC's new Route 28 PFR lot across from the Catskill Interpretive Center. Thank you for considering my comments.

78) I support this stream management plan. Particularly, the efforts on habitat improvement and providing year round fishing opportunities.

79) Good afternoon, Regarding angler input on trout stream management, i'd like to throw in my two cents. I'd really like to see more done on preserving wild trout populations on local streams. By local, i'm referring to all of Upstate NY. I have to say i disagree with the policy of stocking test tube gub-gub trash trout over wild trout and letting the hillbillies keep 5 a day. It seems that rivers that could be destination fisheries in Upstate are eclipsed by systems like the Delaware where wild trout are allowed to flourish, for the sake of having an abundance of put and take fisheries.

Every serious angler I've met, once they understand the difference between wild and stocked trout, typically invest all of their time in avoiding stocked waters. Thats not to say there isn't a place for stocked fish, but maybe where its possible for natural reproduction to occur, start shifting focus to letting the wild populations grow to see if a sustainable population could come of it. As more and more anglers understand the values of catch and release fishing and the importance of preserving wild trout habitat, i think the practice of stocking does a disservice to, and is counterproductive to that progress. Many wild trout anglers feel neglected in a way, in that the wishes of anglers that may fish A couple hundred days a year or more, and the wild fish they're after, are ignored in order to appease the fisherman that may fish 10 days a year and are looking to keep their limit and go home. In short, i think Upstate loses a lot of potential to anglers traveling outside the area to hunt for wild trout elsewhere.

80) The Western New York Chapter of Trout Unlimited would like to express its wholehearted support for the proposed Inland Trout Stream Management Plan. As an aside, you and the Department are to be commended for the amount of public involvement that you have fostered since the very beginning of the process of formulating this plan. From the original public meetings to see what the angling public would like to see in the management of inland stream trout fishing in NY, to the focus group convened to get input on whether the plan dealt with the issues the public felt were most important, to the science-based proposals themselves, to the public meetings to introduce the draft of the plan, this has been a thoroughly transparent process. The public has been kept informed of what was being done at every step of the way. Thank you.
There are many things to be praised in this plan. As a TU chapter, we are especially thankful for the emphasis to be placed on habitat improvement. I think it has perhaps been hit or miss in Regions throughout the State in the past as to how much involvement DEC had in this matter. Different Regions have had different priorities, staffing levels, and funding levels. We've been lucky here in Region 9 to have had DEC leaders in Fisheries who have always been supportive in these actions.
You are to be praised for providing justifications and citing scientific studies for policies that are significant changes to past practices – that things are no longer going to be done by instinct or "gut -feelings." Overall, we feel this moves NYS into the forefront of inland trout management nationwide.
Finally, you've assured us that this is a "dynamic" plan and that consequences will be monitored and the plan altered if necessary. That is certainly needed for any such mammoth endeavor. Congratulations on a job well done.

81) I would like to express my wholehearted support for the proposed Inland Trout Stream Management Plan. The Department is to be commended for the amount of public involvement that it has fostered since the very beginning of the process of formulating this plan. From the original public meetings to see what the angling public would like to see in the management of inland stream trout fishing in NY, to the focus group convened to get input on whether the plan dealt with the issues the public felt were most important, to the science-based proposals themselves, to the public meetings to introduce the draft of the plan, this has been a thoroughly transparent process. The public has been kept informed of what was being done at every step of the way. Thank you.

There are many things to be praised in this plan. AS a Life TU member, and former stream projects chairman for our chapter, I'm especially thankful for the emphasis to be placed on habitat improvement. I think it has perhaps been hit or miss in Regions throughout the State in the past as to how much involvement DEC had in this matter. Different Regions have had different priorities, staffing levels, and funding levels. We've been lucky here in Region 9 to have had DEC leaders in Fisheries who have always been supportive in these actions.

You are to be praised for providing justifications and citing scientific studies for policies that are significant changes to past practices – that things are no longer going to be done by instinct or

"gut -feelings." Overall, I feel this moves NYS into the forefront of inland trout management nationwide.
Finally, you've assured us that this is a "dynamic" plan and that consequences will be monitored and the plan altered if necessary. That is certainly needed for any such mammoth endeavor.
Congratulations on a job well done,

82) Hello. My name is Len DiGristina and I live in Victor. I Have read the DEC draft Trout Stream Management Plan and I fully support it!!
I am an enthusiastic fly fisherman and one of the nicest rivers in western NY for fly fishing is the Canandaigua Outlet River with it's hard bottom, wide girth and is wade-able in most places. But there is one problem with this river. There are no trout in it. I have fished this river for 3 years and dozens of times for hours at a time between Shortsville and Phelps and never caught a trout. The DEC website indicates Each year that they stock this river in the location that I fish, but trout are no where to be found. There are bass and other fish I catch there, but where are the trout??????

So my input is, please invest in trout stocking in one of the best fly casting rivers in western NY.....Canandaigua Outlet River. Thank you!!

83) As a member of Trout Unlimited's Western NY chapter, I would like to register my support for the proposed Trout Management Plan.

84) Stronger effort on habitat improvement
    a. Working with farmers to minimize:
        i. Water withdrawals
        ii. Access by livestock – should be selective access not complete access to mitigate bank erosion and over grazing
        iii. Spraying of pesticides and herbicides and subsequent runoff into the stream
        iv. Spreading of manure
        v. Protection of riparian habitat
    b. Appropriate vegetation on stream banks to enhance protection from the sun's midday heat
        i. Attract and hold terrestrials as a food supply
        ii. Stabilize banks especially during periods of high water flow
    c. Repair/replace damage or worn-out existing stream structures
        i. Evaluate streams for enhanced habitat management
            a. Paying particular attention to shallow and/or wide stream sections that can increase water temperatures and minimize useful habitat
            b. Stabilize banks to minimize erosion, especially in areas that provide spawning habitat or where streams make abrupt direction changes
            c. Control velocity of stream flows, especially in areas where private/public land is impacted.
                i. This would aid in reducing unauthorized stream channelization, removal of bends that collect flood waters and slowly release the pooled water back into the stream
                ii. Stabilize stream bottoms to minimize the effects of spring freshets and high-water incidents
            d. This work should be concentrated on streams close to human populations and streams that receive high angler traffic/ use
                i. Less "angler-stressed" streams would be secondary even though the stream quality maybe better

ii. General affect would increase angler satisfaction, assist in maintaining fairly stable fish populations because of habitat ability to carry higher fish populations

d. Determine if there are any springs within a viable distance of the stream and assist the spring to find its way to the stream in a way that will provide additional water, and cooler temperatures

166. Consider stocking fish prior to spawning season

a. Idea is to have fish reproduce in the stream and, hopefully, develop in-stream ability to survive instead of developing a dependency on artificial feeding
    i. I understand the Dept does not attempt to establish new reproducing populations. However, with catch-and-release in the fall, this still might be option to be considered. (page26 of plan)

167. Regulations

a. Perhaps consider closing the season during July and August to prevent overstressing of fish caught in water with temperatures at a level that seriously jeopardize the ability of the fish to recover
b. Prohibit the use of treble hooks to prevent excess harm and difficulty unhooking fish that should be released

168. Increase angler access

a. Some stretches of stream with PFRs are long with no roads or paths to access the stream between bridges.
    i. Adding access paths would aid in spreading angling pressure over the length of the PFR section
b. Enlist, as much as possible, Anglers, Trout Unlimited, residents who live on or near the stream, to float stock the streams as much as is practical
(I have participated in float stocking the Wiscoy in Wyoming county below Pike. Knowing this section is float stocked encouraged people to not congregate at bridges. When you get groups of people congregating, group dynamics become questionable and issues develop including leaving behind a mess.)

169. New York State Highway Department

a. Increase outreach with the NYS Highway Dept to enlist the DEC's guidance when repairing/replacing bridges over waterways
    i. Ensure fish can successfully pass under the road to move to upstream spawning grounds
    ii. Ensure the stream channel maintains a minimum depth
    iii. Work with the Highway Dept to minimize channelization and straightening of stream beds.
        1. In the long run, channelization makes spring and fall freshets and flash flooding even worse as there are no "natural slowdowns," i.e. bends, eddies, etc. to decrease hydrologic velocities
    iv. Work with Highway Department to minimize the spreading of salt and plowing around bridges to mitigate introducing deicer material into the waterway

In general, try to improve fishing conditions near population centers to:

1. Maintain and further interest in fishing
2. Minimize travel distance
3. PR for what the DEC is doing and how it helps the environment
4. Trout in the classroom

Thank you for the opportunity to submit my ideas.

85) I would like to express my full support of the Trout Management Plan the NYDEC has proposed. It is a plan that has taken into account all the different aspects required to support and enhance trout streams and trout angling throughout New York State. I liked the fact that scientific/biological data and analysis was used on management decisions and regulations. In particular I thought that Appendix A of the plan provided sound biological evidence and analysis to justify the year round angling regulation change. Many states have been doing this for years with no detrimental effects as the studies showed. I also really liked the emphasis on stream habitat restoration and improvement. Given the current economic conditions of the state I fully understand the challenges of staffing but I would like to emphasize stream improvement projects are a vital part of the overall plan. Thank You for putting all the time and effort in what I believe is a plan that will enhance trout fishing for the present and future.

86) How is it determined which stream to stock?
How is limnological data used in selecting streams and # of fish/species?

87) Regarding the NYS Trout Management Plan:
Mettawee needs WILD TROUT in NYS side (VT side is already managed as wild trout fishery) - Like the Montana model from the 1960s to present, NYS should stock only fingerlings with Mettawee River Genetics.
See attached PDF file (feel free to share these documents)
-- Bachman paper abstract
- Montana Plan (Madison River excerpt)
- Montana Plan (example) - BLUE RIBBON fisheries with a huge number of visitors to state since going WILD.
- Transylvanian Plan (example)
etc
All projects should be looked at taking under consideration all interests of any river.

My initial reaction is that I did not see the GENETIC mgmt Lhol is onywhere like what Montona is doing on ALL WILD TROUT RIVERS. Mon Lana as you know selects and separates BROOD STOCK from a stream, raises the eggs. and puts FRY back inlo the stream lhat the brood stock came frorn. Suggest you borrow directly from MONTANA management plan.. as the Montana Plan (example) - has produced many BLUE RIBBON fisheries with a huge number of visitors to state since going totally WILD in trout rivers - with their genetics based stocking of only small trout FRY. Only stock catchable size trout in PONDS ancl LAKES or very wBnn summer ·Naters nei"lr urba'1 areas for kids to fish for t:!'" at rtuf> t:" .. □rnoc:, wi!I never !1ve t•·orn season to seasoi·, in cl pure put-and-tuke direction. –

-also see the Pennsylvania Trot1t Mangement Plans (example)

-- Also - the data (a research document I can not put rny hands on right now! shows that TROUT that are caughL in Year Around Troul fishing &reas suffer from fisher folks playing of, and handling of, all the trout. DUE TO STRESS not experienced during optimal trout temps dutin,J other times of the year (the problem is lactic acid buildup Lhal docs not leave the fish due to a very low metabolism in very cold waters of winter). Again, ONLY when caught and handled by fishing folks ... with a death rate thut applies, of course. I would challenge NYS on allowing any year around open tr0t1t fishing UNLESS allowing fishing in areas of more stable trout-loving winter temps you ONLY find below a dam with stable TAIL WATER ternps {rear ciround is ok then) .
.. THE HABITAT language in the document is encouraging. See below comment that is related to habitat
(the most critical factor in year around st1rvival in any trout stream or river IS TEMPERATURE, both warm water and ice cold waters of winter) ...
-- So, AS FOR TEMPS of lower Mettawee River ... see attached design ...

Steve Roy said more trout die from a lack of over-wintering habitat & structure · the trout die from high summer temps, but winter COLD kills more (and freezes trout eggs with anchor ice etc). I fully agree with Steve. As. I have observed in all reacl1es of the Mettawee VT & NY during trout die offs even 111 VT, that the trout when the water is too hot, they move Lo colder SEEPs if available in order to stay alive during hi gher temps (I took multi-year termp readings all over Lhe Mettawee cind those higher temps only showed up for 4-5 hours typically before mid-day to afternoon then the sun is not direct, and the river geo-tt1ermally cools down on its own. In VT fish have been shown to move way upstream during hotter times. The Batenkill River VT state studies with rudio tracking show fish moving up to 15-17 miles UPSTREAM dunng certain times of rhe year. uno moving bdC.:k Liown l<J w:-,ere they were bel·ore during o□i1c:· □l;'0C□???
- Suggest looking into establishing a run of Land Locked Salrnon to the Mettawee River that evidence shows had a PRE-WHITE man RUN (lower Lake Champlain is a big river). The holding water for landlock salmon in the Mettawee is better than any other NYS trib to Champlain, water quality starts at
Marble/Limestone springs in Dorset VT - close to urban areas, would be a big fishing tourist attraction due to amazing water to fish for land locks in FALL or SPRING (hoidovers too). Just need a !udder in Whitehall at BARGE CANAL clam as Mettawee goes into the Canal system just upstream of thut Wl1itehall NY clam. I have spoken to kids fishing below that canal dam and they on a rare occasion caught what sounded like a lcind lock salmon as they did not know what it was, and they had farnily that fished South Bay and knew
every fish in lower Champlain, but this one they did not know about and their description was text book for a land lock salmon (caught at the rocks during fall low water at the base of the canal dam in Whitehill I NY).
On the Mettawee - the worse case higher temps only happen during only cluys, or a week or two dLJring the season (depending). I identified place that were black with trout at a cool water seep of only a drinking size straw size volume of water with fish size from year old to large battle cruisers in the 25 inc11 PLUS class that ALL MOVED together with the larger fish totally leaving the smaller alone (all were gasping for cool 02 in the water and did not use energy ior anything else) In Lhose areas I could 11ave netted easily

i1undreds of trout in ,rnnuts. So, to copy this SEEP ilow concept again NOT NEEDING MUCH COOL WATER
to provide a refuge. I clesigned a way (see attached) to manufacture cold water seeps with complex tree-root-like structure with cover for trout to move into during this time. The TROUT then will go back to feeding in other areas of the pool and stretch of tiver. as the fish move rrom multiple pools away when the nver starts to cool down, in late afternoon, evening, night. and morn1119s until the river sLarLs to heat up again. THIS STRUCTURE also provides comples (root system-like) over wintering Mbitat tor trout whose metabolisern slows down to move into and hide from predators. In winter, this is important, the trout can find seeps in summer wilh cover, but in winter there is no escape unless there is a TREE ROOT SYSTEM
that is deep and complex for U1e Lrout to move into and semi- hibernate if needed there, hidden. Again
see concept attached, where LUNKER STRUCTURES (made out of HEAVY STONE and WOOD, etc) modified
ro provide COLD SUMMER REFUGE SEEPS and a hiding place, AND WARM WINTER SEEPS and a hiding
place. THESE WOULD BE PLACED in every pool that experiences temperature and lack of cover, habitat, hiding areas, etc.
Not a hypothesis ... as I spent years observing this SCIENTIFIC FACT - I told biologists and others this tor years BUT they looked clown their noses at me, as I am not professionally trained (but have spent more tirne on this subject of temps than any ... well. they had no comment and belittled my comments as if from an amature. THEY when pinned down, of course admitted lllal lhcy I1ad no experiences (like mine, and spent no time looking into it after) at all. AND they of course had NO EDUCATION at the University, or on the JOl:s, ttfift can1e anywhere c,ose- to what I doc□rnentcd over all those years of studying VT & NY Mettawee River trout· focused on

what happens to them in the summer (and the winter). One key observation location was behind rny office where I worked opposile the river rrom the Slate Museum (I could sneak out and ftsh, or just observe during lunch), where one key observation was WHEN what happened to the trout and the river after an important HUGE Tree Structure washed away. That TREE, wilh an extensive in-wacer root system for years always had many large and smaller WILD fish that used that habitat during both during spring, summer, fall, and winter. It was perfect. That huge tree sticking way
out into the river causing a big calm back water downstream from ,t, was totally taken out by Hurricane Irene (and what I obse,ved for years before and after). NO MORE FISH THERE AFTER that storm· like before! The root system would have provided key refuge for trout to move into and hid from otters and mink during the winter DEEP into the tine and complex root system, the trout could sleep all winter and with slow metabolism could be there motionless so where not detected. I watched both otters and mink fish that area. even when ice was on the river, but never saw one eat a trout, I did observe thaqt they only ate ccayftsh , many of them, that they caught under the rocks in r11at pool. Ti1ey would go underwater
near that tree hunting. and crawled out on the ice ALWAYS with crayfish, holding them in their paws as
they munched on them. never a trout.
NEW science discoveries, are not from a book. but instead, OFTEN the discoveries are from repeated and conclusive observations seen ONLY when in the field ... just like what Dr Bachman did for 3 years on that J stream in PA.

88) For over 50 years all I fish are very small streams mostly with beaver dams for native brook trout,raise the limit to at least 10 for native Adirondack Brook Trout again like it use to be,I would walk miles into a stream to catch a limit of 10,now it's a joke to to that and come home with 5 small native trout,these beaver ponds I fish hold 1000's of native trout,have a monthly limit of native trout,I just won't do it anymore.There is a big difference between stocked streams and native trout streams.
89) I am very pleased to comment on the proposed Tout Stream Management Plan.
First I would like to express my appreciation of all the hard work that went into this plan and the effort by the Department. I appreciate the opportunity and outreach that was done to get input prior to the plan being put together. also I'd add that the simplification of the Regs is something I have long hoped for.
Overall the plan offers a bold new approach which I personally agree with the plan and it's aspects on protecting the Heritage strains.

There are only two items of minor concern.:
One is the protection of specific names and locations of Heritage strain streams, Preferably a general area classification would be most beneficial such as a particular wilderness area etc.
Secondly, it is somewhat implied that there is a review process on the effectiveness of the plan but not specifically stated. I would hope there would be a review of the Plan after a year or two.
90) I am an avid winter fisherman on the West Canada creek. Hopefully the new plan involves extending the winter catch and release area of the river. I do suggest that catch and release should be fishing the hooks with a single hook point. All to often I catch trout with jaws the at badly torn from improper hook removal . I'm sure this increases the mortality rate.
At the chance of sounding like a purist, I would love to see the trophy section of the West Canada be designated, fly fish only. I often find worm containers left along the river or tossed in the weeds. On a number of occasions I've caught spin fisherman using corn or power bait only to be told it is legal because it is not live bait. Bait fishing with a fly rod is nearly impossible. Many rivers within the state including the Salmon river have fly fish only areas to protect against higher rates of fish mortality and the section in question is only a small section of a river that runs from Hickley damn to the Mohawk.
91) I'd like to see a wider dispersal time for trout stocking. It really bothers me to see stocked trout fished out as soon as they are stocked. Your stream improvement plans look good. I also like the idea of keeping some streams for wild trout fishing [catch and release] only.

Thanks for all you do!

92) My only concern is in regard to spawning redds and their possible disturbance by well intended anglers. Your plan draws the conclusion that there will be no significant impact by wading anglers in these spawning areas but only relies on one study of the Yellowstone River decades ago. I'm sure you are aware of the vast differences between the Yellowstone system and the Catskill rivers. I think that relying on this one study is comparing apples to oranges. The redds will get trampled and despite a catch and release regulation, there is a mortality rate despite the good intentions of the angler. My suggestion is to give the fish a rest from October to April.
93) I live in the hudson valley region. Supposedly there are trout stocked in fishkill creek, in beacon and fishkill, about 25 min from where I live. I really cannot find public access. DEC lists the bodies of water but doesn't specifically state where I can find access. I think when you stock the fish you dump them from a bridge but I thought that where they were stocked; that, that spot had to be "public access" and the trout really don't travel that far. I found one spot on crum elbow creek in hyde park, pretty much across from Texaris Polaris... but it really wasn't much of a spot. So as part of the trout stream plan, I would appreciate it if you would focus on public access.
94) The west branch has really slipped as a fishery in the last 5-8 years
When I do fish it , it is over run by drift boats and guides, vastly affecting a wild fishery
It used to be more of a wild stream with larger fish more often
I recommend some regulation on local shops and catch and release throughout the entire west branch river
95) I think New York should close all trout stocked streams and rivers two weeks prior to the April 1st opening day. Those waters that are open all year for trout fishing and are stocked before the start of the season are "fished out" before April 1st by many inconsiderate fishermen in our area. It would also be helpful if the rivers and streams were stocked more frequently. In our area, Region 3, the waters are stocked only twice a year and the DEC should publish the stocking dates of the waters.

96) In general, the plan is well laid out and seems pretty encompassing as it relates to the many aspects of trout management. Some personal experiences:
I reside in Dutchess County and have noticed a decline in trout populations and size in several streams such as East Fishkill Creek, Wappingers Creek, Ten Mile River as well as the East Branch Croton River. Trout are present and I do catch my share and enjoy the experience. What I've noticed is that fish are in general, smaller on average. However, an encouraging aspect is I'm noticing more wild browns but also noticed much less Brook Trout (which concerns me because they are a leading indicator of environmental conditions). I'm not sure if the problems stem from environmental conditions or just lack of stream management and or land management - of which I believe the latter can be more easily rectified than the broader environmental issues.

I also fish a lot of tail water since we live close to the NYC watershed. Here is probably where I have my most complaints. Great wild brown steams like the West Branch River seem to be starved of water flow at times, making it very difficult for wild browns to grow to sport fishing size. The lack of water means lack of food and space for fish, which increases the likelihood of fish to migrate out of the stream and into the reservoirs or perish in the migration effort.

I thank you for the opportunity to comment and hope to see improved conditions.
97) sounds like a great move (referencing comment #95)
98) Hello I would like to see more patrolling of the streams here in Central New York. Oneida county in particular. There has been a lot of foreigners on the waters taking over there limits and undersized fish.They swarm the areas when the fish are stocked and feel that they can take all that they can catch.They don't seem to care about how many fish they are aloud.They don't take in to consideration that they are stocked to help keep the trout streams thriving. They leave their garbage all over the banks and in the water which also affects the fish and fishing situations.I also

trap on a few of these waters and it just turns my stomach so much as to how disrespectful they are. Thank you

99) NYS streams in Sullivan county such as the Neversink should remain open to fishing after the Oct. 15 closing date as a No Kill fishery till the season reopens on April 1.

100) I am writing in regards to trout steam plan. I fish a lot on the Otselic river and the Genegantslet bot streams are good fishing. But could use a lot of cleaning up especially the Genegantslet. Also need more accesses to The Genny as we locals call it. Anything that could be done on these streams would be very appreciated. Anything I can do to help please let me know. Our local chapter is more concerned about the Delaware river. Thank you.

101) This is a great idea, I would love to have greater knowledge of and access to fishing local and nearby streams. looking forward to getting my kids involved.

102) Need to stock more trout! Please and thank you

103) Good work on the trout plan!
I look forward to the catch and release during the "off season".
One other thing I'd like to see mandated are single barbless hooks for catch and release. I believe that barbed hooks (and especially multiple treble hooks that are common on spinners) are very damaging to the fish.

104) Wild fish population is Wiscoy and other streams in western New York are being threatened by a range of factors. There should be some research to try to understand why this is happening and create a plan to mitigate those causes. The need to manage the creel limit is important. I recommend protecting all wild trout waters by making them catch and release for a three year period until the numbers rebound and then limit the creel limit to one trout per day. Although my preference would be to keep all wild trout waters catch and release. Let anglers, like myself, take fish out of the stocked streams and protect the wild fish fisheries. This would provide a long term boom to fisheries and economics and more anglers would go trout fishing.

105) I saw 1,000 small 7-8 inch brook trout stocked at the Auburn Owasco Lake outlet at the state dam from Utica or Rome hatchery. I fish there a lot and I have yet to catch one. I think they were fish food for the northern pike swimming around at the base of the dam or they migrated down stream .
Usually they stocked 1,000 9-10 inch rainbow trout there and they stayed there and some migrated all way through Auburn to the Auburn Prison wall. A few years ago I was so surprised snd caught two 17 inch rainbows there which was unusual , since small mouth bass was prevalent . They may have just stayed there and got big and fat in that big hole pool.
Since rainbow and trout survived I was hoping that the state could stock a few hundred trout further down stream in the city of Auburn since the water is clear and cold . Right by the Auburn police and Fire department buildings is a good location to just drop them off the bridge overlook on Genesee street and loop road . The trout will certainly migrate from there To downstream easily .
Very few of the trout have been caught in my years of fishing.
Another location is the Mill Street dam off Owasco Street which is further down stream from the state dam and stocking can be done there easily from the dam or below the dam where there's a small access road for the stocking trucks to drive down to the river bank by the hydroelectric building.

106) As an avid recreational fly fisher, I completely agree with the prioritization of our wild/native Brook Trout over all, then wild reproducing Brown and Rainbow trout over any hatchery raised trout. Secondly, I always wondered why we would stock hatchery bred Brook trout over native populations…. It would seem such stocking would interfere with wild reproduction and "water down" native genetics

Can we outlaw all and any hatchery raised Brook trout in the entire state (excluding any specific project conducted by our DEC)?

Lastly, I look forward to seeing some kind of new logo/signage posted on all newly designated Wild sections of our streams and rivers. Perhaps asking for design ideas from the fishing public would be a great way to educate, motivate an incorporate cooperation from the folks…

Keep up the good work!

107) I fish trout through out central NY. Limestone,Skaneatlas,chittenango creeks to name a few.I believe the trout fisheries around here are steadily improving every year. That being said I'm primarily sending this note in reference to 9 mile creek which starts at the Otisco lake dam an runs through Marcellus all the way too Camillus an beyond. Below the Amboy falls in Camillus all the way to where the creek meets Geddis brook is catch an release only which I have no problem with. However I wish the word could spread to some Tiger Musky fisherman about this stretch of 9 mile creek which holds some of the widest an deepest pools in 9 mile. I personally have caught over 14 tiger muskies in this stretch over 2 years naturally not with trout gear. Four of the above fish mentioned had a sizable brown trout 15 inch plus down their throat. It should be noted that not on Muskie was under 42 inches some that broke my litre were in the 50 plus range.Thes fish in that stream are eating machines an eventually I believe will hurt this fishery. Now I do realize that this creek is stocked heavily but it seems redundant if there's no effort to reduce the tigers. Keep in mind the tigers I'm catching are on the lower stretch of 9 mile which means they made it along way from the dam in Otisco lake. Who knows how many there are in all of 9 mile an how many trout they eat during that 40 mile trip to Amboy.Ive found these fish naturally hold up in the larger pools but my concern is their eating big Trout. Just thought id share. Thank you. One question do those tigers go back in 9 mile creek if caught. I would have thought that they would be considered an invasive fish in that creek. Thank again.

108) GO WITH IT!!!!!!

109) I am writing to express my opinion on the trout stream plan DEC has drafted, First, thank you for all the hard work. NYS is an incredible resource for many different fishing opportunities, and inland stream fishing is one of the most valuable/fragile of them.

I am almost strictly a catch and release angler when it comes to trout in streams. I believe the reward and recreational opportunity of someone being able to catch that fish again and allow it to grow, greatly outweighs the small meal that it may provide. I understand this is a privilege. However, I also see a great opportunity to enhance the recreational fishing industry in the state.

I am all for opening up more streams to year round catch and release practices on artificial lures. I think the number of anglers who would take advantage of this practice is very small and they tend to be more conscious of their impacts on the environment.

I would also be encouraged to see more sections of rivers designated as catch and release artificial year round. I believe there is a real opportunity to establish healthy wild reproducing populations of trout in our rivers, given the chance. I look to management practices of states like Montana, where they have not stocked trout in many rivers since the 70s and they have one of the greatest fishing economies in the country. or elsewhere, closer to home on the Delaware and in Western Mass, where there are many more miles of catch and release designated streams. The quality of these fishery practices can't be denied.

I understand that stocking can be a valuable tool for learning and in streams where trout populations can not naturally sustain, so we need a balance. But I think that balance has to shift much further towards more catch and release mandatory fisheries. Stocked fish compete with resources that could otherwise go towards sustaining wild populations of trout. Not to mention the yearly financial resources that are consumed during stocking programs.

Thank you for your time. I would love to see NYS become more of a mecca for trout fishing. We have the water and I believe with proper management and a shift in thinking we can realize this potential.

110) I have been fishing inland trout streams in NY for over 40 years. It is time to eliminate stocking two year old fish. Ever since the ten fish limit was eliminated to compensate for the two year old fish the inland stream fishing has nose dived. Catch rates are down horribly. The fisherman all say the same thing.....the fish aren't stocked like the used to be. They aren't. One two year old takes up the space of three yearlings in the tank. If I want a trophy trout I fish the abundance of streams that lake run fish live in seven months out of the year.

111) I've got one basic "comment" on something in the PLAN SCOPE that states *lakes and ponds* "...are outside the scope of this plan". While a lake or a pond or reservoir are not streams, most of them do have streams flowing in one end & out the other. I think including still bodies of water even in a limited way, would enhance opportunities for the public to access the streams via the lakes, ponds & reservoirs & increase their understanding of the "whole picture" by making the participation in conserving & protecting New York States water resources easier if not more convenient.

112) One of the finest wild trout streams in your system is the West Branch of the Croton River from the Drewville Road north to Route 6. near Brewster. In recent years the flows have been cut down to around 10 cfs which will not support the wild trout population. If you can plan to increase the flows that will save this great river.

113) Dear Sirs, I primarily wish some streams in New York for last 30 years. Besides traveling to fish the Delaware system, I also fish the Battenkill River locally from Greenwich into Vermont . I believe that the Battenkill River could be greatly helped with more habitat improvements and also with a staggered delay stocking program. To many meat fisherman tend to come and clean out stocked fish in the spring , not leaving the river until their catch decline. Better and more special regulations like catch and release,and delayed harvest would enhance the river. More habitat work with volunteer participation would help give better grass roots ownership.

114) Great Job stream fishing has been great in NY. My favorite pass time!!!!

115) The problem I see is most of the trout streams are privetly owned. The law that was passed that someone can actually own a trout stream was detrimental to trout fishing. I know that the Dec has aquired land and streams to fish but the public fishing streams get over fished.

116) Dick Vincent did an extensive study in Montana in the 1980s The results showed if they did not stock streams that supported wild trout no matter what the fishing regulations were during the study in all cases there were more and larger trout in the streams and rivers by not stocking. I learned of this from Leonard Wright. Montana has already done the work for everyone and I believe Pennsylvania does some of this already.

117) plan looks well thought out,as a trout fisherman of 60 years I worry about recruitment of young anglers.I was a contact person forDEC assisting with lining up volunteers for over 40 years here in region 8 and 7 to stock trout and have also seen changes in stocking and fishing pressure in our area. The smaller wild trout streams have seen less pressure while streams like Cayuta creek have increased , changes in harvest limits should help to extend this fishing longer in the season. One suggestion I would have would be more of a mix of rainbows with browns where feasible, I believe would generate more angler interest.

Thank You for the opportunity to comment, it is a subject dear to my heart as I serve on the Tompkin County Sportsmans Federation board,

118) The plan might be a good one,except it probably wont work. There is somewhat of a plan now,I think,and the hatcheries are supposed to follow it..

Like the stocking of trout in the Walloomsac River. Over 4k trout were stocked. When I checked the area I fish in the Walloomsac, I did not see one trout swimming or rising. The area is the Cotrell (sp) bridge ,just before the Vermont State line.

We all know how clean people are, there were no empty worm,or soda cans to be seen, and the brush wasnt beaten down....and I did not see one fish eating duck....

All I can say is I hope your new plan works better than the old one.

119) I've sent letters over the years thanking the DEC for the great job it does throughout the state with such limited financial support.

Once again you come through. Great to finally have year round access to my local trout streams instead of having to drive to CT or PA. Great on all the size and quality over the old Eagle Claw stringer mentality.

Is there a way we can get more sections of quality streams designated catch & release only? Maybe tie it into reported and then verified wild reproduction areas? I catch brown trout par and 20" hens on a nice section of the Ten Mile in Dover only to see discarded night crawler Styrofoam containers next to my favorite runs and pools.
Thank you for being open to change and for making it happen.

120) You should consider allowing five trout of any size for a daily limit in the Otselic River. Sometimes all the recent stocked trout are 13-14 inches. I drive over an hour and want to take more than 2. If I continue to fish in order to catch some smaller than 12 inches I have a good chance of killing the larger ones I throw back.

121) Here's my take on this, I have fished the Battenkill River for years, caught some really nice fish, the best was a 22" brown. I never worried about wild over stocked,
I know stocked fish are prey for local fish, I know stocked fish can hold over and even breed, grow to a good length and add to the fishery. I think that if you believe that
Not stocking the Battenkill Trophy section will help it become a wild fishery then you have your head up your creel. It's a FREE STONE, the fishing now is terrible,
No bugs – very few fish –a lot of tubers, poachers and drunks/drug users, I've seen it all. You don't have the people to patrol the area now so you are going
To let the locals take what few fish are still there. I have abandoned NY trout waters or the Farmington, a TAIL WATER, managed very well, native/stockers
And hold overs. Catch ratio is ten times that of any local stream within 100 miles of Albany. And it is not crowded, you have to know where to go, no more crowded
Than the Battenkill in its hay day with 6 anglers in the rt313 pool. So let the few wild fish thrive if they can, I hope everyone does well in Greenwich. I think I will
Check out the Deerfield River in Mass. Another good fishery. I also think the local TU Clearwater has a lot to do with the above in our area.

122) Better to have a reduced bag limit without a size requirement. Most anglers I encounter don't keep the 8 and 9 inch fish that are stocked. On a rare trip when larger fish are encountered it would be desirable to keep more than 2 12 inch or larger fish.

123) Could we make the area above the D and H canal in Cuddebackville a fly fishing no kill area It holds beautiful large browns and they should be protected Thanks Jim McCabe

124) I'm writing to support the proposal in any way I can as well as offer my services as a professional photographer and videographer. I'm an avid fly fisherman and in love with the amazing nature NY has and protects. Keep up the amazing work.

125) I am a fly fisherman and have been for 50 years. I have seen too many problems with the stocking program that invites so called helpers that run the buckets . As soon as the truck leaves those same individuals come back to the spot of release and take out every two year old brown that was just stocked. This is totally ridiculous for it doesn't give the serious sport fly fisherman a chance to fish for these fish when they become acclimated to the bug life of the stream. There should be a two week window where no one is allowed to fish those areas where the releases occurred. Let the fish get used to the natural stream ecosystem and then have sections of the streams where there is catch and release only. Let the fish grow and winter over as on the Battenkill and other streams in Conn Mass a nd Vermont. It will bring quality sport fishing to NYS and fly shops will begin to sprout up as well as guide services.
The Kinderhook and Poestenkill creeks are two examples. They both have prolific bug life that will support a quality fly fishing experience.
Those who prefer spin fishing should be using single hooks with the barbs down so as not to destroy the fishes mouth. I have seen too many mangled two year old browns then I care to recall. Mouths are torn up from the treble hooks. We need more trophy sections like the Battenkill in Rensselear county where I live. As it is we have to travel 3 hours to get quality flyfishing . The Delaware, Westfield, Housatonic, Esopus are examples. It was great that they put rainbows in the kinderhook this year for they were put in without fanfare from the bucket brigade and they got a chance to acclimate. The fishing on the kinderhook is better this year because they did'n know when the fish were stocked.
We also need to spread out the stocking dates throughout the season such as spring early summer and fall as other states do. It will greatly improve the fishing.

The daily limits should be reduced to 2 fish under 12 inches and all fish over 12 inches should be released. This will make the fishery rival some of the streams out west. As the laws stand now it only encourages wiping out the streams within 2 weeks of stocking and the fishing is done by the middle of May just when the mayflies ore beginning to hatch.

126) Make it more accessible to fish for the anglers. Most places you cant get to the water let alone try to cast especially the seniors

127) I am opposed to the plan to allow artificial lures/catch and release fishing on trout streams (that are not currently open year round) between 10/15 and April 1. Most trout and salmon spawn during that time and I believe fishermen would have a negative impact to spawning fish during that period. I also believe the creel limit during the regular trout season should be 5 trout with no than 3 over 12". I would also like to see DEC add back a bonus of 5 brook trout of any size on selected streams and rivers on the Tug Hill and the Adirondacks. Thank you for allowing me to comment.

128) In the Draft Fisheries Management Proposal, the East and West tailwater Branches of the Delaware are classified as **Wild-Premier**, both to be managed by the exact same guidelines and regulations. In that proposal the closed season and stockings the East Branch receives will both be eliminated. However, because of the physical differences in these two streams, that is not a sound management proposal and would amount to being a serious mistake which is sure to wind up hurting the East Branch fishery. Citing a few past studies performed on other physically entirely different streams, especially in other states and countries, makes little sense in justifying the changes being contemplated.

The East Branch tailwater is on the average not as wide and lacks the water flow of the West Branch due to minimal reservoir releases. This makes the trout in the East Branch extremely vulnerable to a multitude of predators such as bald eagles, ospreys, herons, kingfishers, mink, otters and mergansers, all of which abound on this part of the river. It's obvious that such predation is not as serious a problem on the West Branch because it is bigger in size, has more substantial water release flows, hosts a larger amount of watercraft traffic and has greater angler usage. And because of its substantial flows, the West Branch receives a steady migration of trout from the Main Stem which serves to keep the population robust.

At present the East Branch has a closed season specifically put in place to protect the spawning trout, plus it receives two supplemental stockings of two-year-old fish. Both the regulation and the stockings help to sustain a good trout population, making it one of the best producing streams in eastern New York in spite of the predation. This is evidenced in the large number of juvenile trout I catch as well as others of obvious wild origin, plus stocked fish, which holdover and grow to substantial sizes. It's a myth that hatchery trout don't holdover, and I catch many during the course of a season, along with wild ones, which lived long enough to obtain exceptional size status.

Both the supplemental stockings together with the closed season, have proven to be effective management tools for the East Branch, and both should be continued in the future exactly as is. Continuing the stocking of the East Branch will help to bring it closer to par with its West Branch, which also receives an influx of the trout stocked in its main feeder, Oquaga Creek, which drop down. I catch them all the time and they undoubtedly are logged in your electroshocking surveys. It's also common knowledge that the main stem of the Delaware likewise receives a token stocking from its main tributary, Callicoon Creek. There's absolutely nothing wrong with token stockings such as these which supplement the wild population, offset predation, and have helped to maintain the quality of the fishery for many years.

At present the Colchester section of the East Branch receives a total of 770 trout 12" to 15". To make up for the number of fish lost to predation, hooking mortality and killed for consumption, it would be in the best interest of the fishery to retain the present stocking program as well as the closure to prevent human interference negatively impacting spawning fish in any manner. The

outstanding success of the management program presently in place is evident and there is no logical reason to try to fix something that is not broken. Reducing the creel limit to one fish, regardless of size, is the only thing that really makes sense in the current draft and will benefit the entire Delaware fishery.

In closing, I'd like to point out that these thoughts are also shared by Capt. Ken Tutalo the owner of Baxter House Outfitters, Roscoe, NY who has spent 20 years professionally guiding clients on the Delaware River system. Let's not take too much for granted in trying to predict the future and gamble with the great fishery which already exists.

129) While I do appreciate the extensive amount of effort that went into the development of this draft document, I am of the opinion that this plan needs to be substantially re-thought as follows:

- Based on over 50 years of diverse trout fishing, the quality of trout fishing in NYS has steadily declined due to lower trout populations, increased fishing pressure, increased development, degraded in-stream conditions (including degraded water quality, warmer water, excess sedimentation, invasive species and poor in-stream habitat), decreased access (including massive increases in posting), inappropriate angler behavior and the lack of enforcement of existing regulations. This plan does not address most of these issues.
- Instead this plan focuses on stocking, catching (and mostly keeping) trout - rather than on enhancing the quality of the fishing experience.
- What this plan should primarily focus on is aggressively protecting watersheds and improving in-stream habitat (not just lip service but aggressively addressing all the issues identified above) - not recreational potential or catch rates Numerous studies have demonstrated that habitat improvement projects dramatically increase fish populations and fishing opportunities.
- To achieve these objectives, the resources to achieve the above should be made available by dramatically decreasing the size and scope of the trout stocking program, by raising license fees, by requiring a trout stamp for adult anglers and by employing other creative funding approaches
- The budget for stream access should also be dramatically expanded - perhaps by providing benefits to landowners in addition to trespass fees - such as implementing stream improvements and providing volunteer labor - techniques which are widely employed in numerous other fisheries.
- Stocking should be limited to a smallr subset of streams selected to provide limited angling opportunities for young and older anglers who wish to keep trout. No stocking should occur in streams which cannot typiclly support trout year round (other streams should be managed as warm water fisheries) and year round angling might be allowed.
- All other streams should not be stocked, all trout fishing should be catch and release and wherever possible only artificial lures should be allowed. The overall objective would be to reclassify most streams as "wild' rather than "stocked."
- DEC should significantly expand its cooperative efforts with local conservation groups, such as TU's local chapters, by funding far more stream habitat projects and thus leveraging volunteer resources throughout the state..
- To encourage new angler participation, DEC should significantly expand the Trout in the Classroom program and follow up such programs with stream conservation, stream clean-ups, invasive plant removal programs, trout fishing instructional programs, fly tying and similar mentoring programs in schools throughout the state.
- Given the limited amount of data currently available, a statewide non-regular catch and release season should not be implemented at this time. Instead a representative state wide study should be implemented on the level of angler interest in such fishing and the potential impacts on trout fisheries. In any case, such fishing should not be permitted during spawning seasons or unusually stressful conditions.
- In over 50 years of trout fishing, I've seen only two enforcement officers in the field. There is no doubt that that there is some non-compliance with the current regulations - including poaching - though it is not clear to what extent the trout fisheries are being impacted. DEc should assess and address this issue.

- DEC should provide a clear summary of how its trout fishery resources are currently being spent, how such resources would be spent under this draft plan, how such resources might be spent under any other plan modifications and should seek public input on same..

Let's stop wasting money on stocking fish that rarely last the summer and instead focus on maintaining and creating habitat that supports wild fish and enhances the fishing experience...

130) I am a long time NY trout enthusiast and over the years I have come to better understand what we want as avid fishermen and what our trout streams need. It is a balance between our excitement and expectations, but tempered with healthy controls to prevent over harvest. One of the key factors we need to keep in mind for our creel limit is the potential to maintain or even improve a genetically superior strain of breeding trout in our streams. As we all know, the bigger ie older the fish, the more likely it is that it's genetics have proved superior for that particular streams conditions.

The following unique concept is fairly easy to understand and allows for the excitement of keeping a very large trophy trout or the harvest of several "breakfast" trout, but ***"self regulates"*** the keeping of too many fish, especially breeding age trout.

Here's the simple creel limit for our **inland, non-tributary trout streams**: **Allow a daily creel limit of no more than a total of 30"s of trout.**
Here's how this plays out.
If I get lucky and land a nice 18" trout. Then I can only keep another 12" trout. Bringing my total creel inches up to 30". The real advantage in this case is I cannot keep another 18" or a whopping 20" trout on the same day! That 20" trout gets released to breed it's superior genetics. And I have plenty of fish for a good meal.

Or the next scenario:

I can keep 3, 10" trout. That's a pretty good meal and I have done less damage to our hardier time tested carry over trout. And left more stocked trout for the next fisherman to enjoy.

Or another example:

This I've done several times. I get a beautiful 15" trout. Then I land a decent 16" trout! That's a hefty creel. I don't need that many more pounds of trout! Release the 16" and keep fishing for another nice fish.
With the present regulation of 5 trout, with no more than 2 over 12". A person could keep and deplete from a superior genetic strain 2 fish, 18" to 20"! Then they could still continue to fish and keep 3 more just below 12"! That's way too much damage to many of the streams I fish!

The beauty of this concept is, it will cause fishermen to consider releasing those 10" fish in concern for going over their limit if they also want to try to catch a couple of 15", 2 year olds. That keeps more stocked trout in the stream for more days for a better fishing experience for a greater number of fisherman. Therefore creating more satisfied anglers.

At present when the stock truck hits Cayutaville Creek down here in Schuyler county or the Cohocton up in Stueben county, we have only a few days to get in on the stockie fishing or it's fairly well depleted. By causing fisherman to gamble and release those 10" fish and limiting them to only 3 it effectively lengthens the amount of days that a quality fishing experience can be had for all.

Also, without saying, "you can *only* keep 5 fish". The angler will actually feel like they have more say so in their days fishing experience. But in actually it makes them consider more their options and cull their catch more. Which then self maintains the duration of a stocking as well as a

healthier more robust age class in any given trout stream. Allowing those carry over, acclimated fish, to potentially spawn and carry on their unique genetic characteristics.
This concept could also work to the advantage of a possible tight state budget, as it takes the numbers game out of the equation allowing for the stocking of less trout that could potentially be passed on for more days.
I hope this concept is worthy of real consideration. I truly enjoy our NY trout streams and perhaps this idea will be my contribution to giving back to the maintaining of our streams I've grown to love so much.

131) This is an absolutely outstanding document, both in the content and in the rationales provided.
I wish to express my sincere appreciation to the DEC staff for their excellent work.
I am a life-long trout fisherman, in both regions 5 and 7. I am also a long-time, active member of the Leon Chandler Chapter of Trout Unlimited.
Finally, I attended one of the DEC public meetings held in 2017.

132) Fred,I have corresponded to you before on Gilbert lake trout fishing,but this is a different matter! I have fished Cincinnati creek for years and have caught Browns up to the mounted fish I have of 23"! Recently I've been catching none, I think the problem there is the runoff of the farmers fields that is right next to the creek! The reason it also called mud creek is evident after a hard rain storm the creek is literally the color of creamed coffee, the same color of the soil in the farmers field,My observation is the creek and fish are being poisoned by the runoff and this being a main tributary into the West Canada at a point of a no kill artificial only trophy zone,mine concern would be for that spot also! Thanks for listening and doing what you do!

133) There should be some goal set regarding PFR's. Either numbers of PFR's or miles of streams to be added. If you have nothing to shoot for then you end up doing nothing.

134) I'm a fly fisherman living in Westchester County, where I fish on the streams in our county, in Putnam county, and in the Catskills. My main comments pertain to the plans for Westchester/Putnam waters. Amawalk Outlet has been and maintains potential to continue to be a good fishery. I would recommend that it be upgraded to stock extended category so it can be strengthened to better support the population of holdover trout.
Also, I'm concerned/curious about opening rivers to year round catch and release. Poaching does occur in our Westchester/Putnam streams. Will DEC be able to patrol year round? How do you anticipate COVID stress on the state budget affecting patrols for poaching, bait fishing? It worries me.
One of our biggest problems with the tailwaters in Westchester/Putnam is the irregularity of dam releases. Anything that DEC can do to address that would help the trout population. Low water during the summer and top of the dam releases of warm water have been detrimental to the trout and the fishing on streams such as the West Branch Croton River.
I look forward to seeing the final plan.

135) Get rid of the cormorants and the blue herons.

136) I have a concern regarding the catch and release regulations. In a stocked-extended river, like the Beaverkill, having a 1 fish limit over 12" will be a problem. It will forces fisherman to keep small fish, which are more likely to be wild. I would suggest you remove the 1 fish over 12 limit and just leave it at 3 fish limit to harvest. Don't make it overly complicated.
I manage the Stream Committee at the Beaverkill Trout Club, a private club between Roscoe and Lew Beach. Our concerns are as follows:

- I agree and support the Stocked – Extended designation for the Beaverkill as we have been stocking our property for over 80 years. We manage it as a put & take fishery.
- I have a concern regarding the catch and release regulations. In a stocked-extended river, like the Beaverkill, having a 1 fish limit over 12" will be a problem. At our club, and most other private fishing clubs, we do not stock fish below 12" length. The new rule will forces fisherman to keep small fish, which are more likely to be wild fish. I would suggest you remove the 1 fish over 12 limit and just leave it at 3 fish limit to harvest, or raise the limit to 15"
- We are concerned that extending the season will encourage trespassing. We currently have a stream watcher during the April 1 to Oct 15 season. Trespassers will be more enabled after

October 15th. We permit several hunters on the property all fall and winter and there could be a confrontation or mistake.

Thank you for your effort on behalf of the fishery

137) Hello …I am president of the Beaverkill Stream Club in Lew beach and would like to offer a few comments on the Trout Steam Planning document.

- Can you clarify the upper limits of the Stocked- Extended area for the upper Beaverkill. Does it range all the way up to Balsam Lake?
- We do not support the extended season for many reasons. We are private water and have a constant problem during the regular season with poaching. Extending the season will require additional security patrols. And of course there is a strong argument for protecting breeding areas.
- The 12' limit in the stocked extended area is a difficult for us to support. We generally stock 14" and larger fish. Smaller fish are almost exclusively wild fish. This policy would tend to encourage taking smaller wild fish…something I think we all agree is not the goal of the plan. You might consider changing the limit in private water vs. public where the State typically stocks smaller fish than 12 inches.

Thank you for your work and I look forward to your reply.

138) cut back on trout dumped into lake ontreo. Many piople would like to trout fish in streams rather than in lakes. No place to trout fish in a stream near walworth ny. Irondiquoit creek is a circus. think about some small streams near webster penfield and western wayne county

139) I am 70, been fishing inland streams since the late 1960's, have valued wild fish since 1968 and I am delighted to view the proposal for re evaluating the state's management plans.
One point I entirely agree with is that somehow the state has bred a strain of brown trout who can not adapt to survival in stream conditions and that the state has come to recognize this. My experience on the lower Oatka Creek corresponds to this, the number of hold over fish I have managed to catch in the past 15 years or so has been reduced to zero. I feel some optimism that the Rome Hatchery is reintroducing some wild trout genes into the domestic stock.
Overall I agree with the regulation changes that are proposed but I think simply adding a wild premiere no kill would help to the categories of wild trout stream categories may help. I could only find the existing no-kills by referencing an appendix at the end of the document.
Ideally I would like to see an end to put and take stocking in streams. I think the fisheries budget could be more wisely invested in areas that have more lasting significance.

Just spent about an hour wading through this plan. No-kill regulations make sense because they are easy to enforce. The state has acknowledged that the domesticated strain of Brown Trout from The Rome Hatchery have virtually no chance of survival in the wild. I think a small percentage of the browns stocked more than 10 years ago did survive and reproduce. An awful lot of effort for the stocked trout management which must be very expensive for the State. The Oatka which lost virtually all its wild trout in 2014-2015 and has yet to recover. Due to the 20,000 browns stocked every year in the past a small percentage of these would survive and spawn. No more due to the domestic strain that has been developed.

140) I'm very happy to see that trout and stream management goals are heading for big changes here in NYS..
I'm 69 years old, a multi species fisherman for 60 years. I grew up in the Berkshires of MA, and have lived in the Cooperstown, NY area for the past 55 years.

STREAM MANAGEMENT: Elk Creek running between Westford, NY. to Schenevus, NY., and the Otego Creek from Mt Vision,NY northward through Hartwick, NY. were both prime streams for stream born brook trout, and brown trout, through the 70's, 80's, and 90's. These two streams were loaded with such native fish, year after year. It was always a bit of a disappointment when hatchery reared fish were added in. Native trout numbers have greatly diminished since those years in those two streams. I don't know the reasons behind such significant declines. Hopefully

New York State stream management plans, when implemented, will resurrect such streams in NYS back towards being healthy stream born trout waters.
For sure a daunting task on many different fronts.

TROUT MANAGEMENT: I'm looking forward to a significant change in the size of hatchery reared trout. It's pretty boring around here with the majority of trout now stocked being only about 8 inches. So much so that I find myself taking 250 mile (round trip) day trips to the Berkshires of MA where the majority of trout stocked are 12 to 16 inches. I take the ride 4 to 5 times each Spring (except 2020) to fish for these quality hatchery reared fish. Each body of water there is stocked 3 to 4 times from March through May, and the higher quality streams also receive an October plant. Fewer fish are put in with each stocking, but this stretches the fish catching season out over a 3 month period, and results in (I think) a greater carry over survival rate since fishing pressure is also stretched out. Stocking just once a year with a big plant of fish here in NYS results in a huge put&take fisherie in a very short period of time each Spring. It'd be nice to see changes in NYS's methods of stocking, and size of fish stocked. Catching big trout should excite the public thus increasing public interest in fishing.

141) The Finger Lakes Conservation Council (FLCC) would like to thank the New York State Department of Environmental Conservation (NYSDEC) for their work updating Trout Stream Management. With changing and challenging forces on the environment, this forward-thinking plan will help to maintain New York's excellent stream trout fishery. Thank you also for involving angler input and public meetings as this will go a long way in making this plan work. The following are comments the FLCC would like to offer for consideration.
Establishing a clear line between wild fish and stocked trout is a good start. It will give an opportunity for a "purist" to pursue a treasure in wild native fish. Not stocking wild trout reaches reduces the competition between the wild fish and domesticated stockers. The wild fish will be able to maintain sustainable populations through harvest management. Many of these native wild fish are brook trout, a somewhat fragile resource that has adapted to its environment over decades and has maintained its presence in the wild. It is very important that these watersheds be protected, especially, from human intervention and alteration.

Habitat improvement, with NYSDEC's expertise in stream improvement and working with sportsmen's groups and possibly environmental organizations, stream improvement projects could be accomplished. Environmental factors such as heavy rains and floods have altered many stream habitats. Human encroachment whether development or agriculture are an ever-present threat to stream habitat by runoff, non-point pollution and siltation. Stream improvement could also increase trout populations making more recreational opportunities. Think about the Habitat Stamp money, possibly a small project with publicity could equal an increase in Habitat Stamp sales.

Making management simpler and understandable. Every angler would welcome this.

Too many regulations. Yes, some unfortunate anglers have been cited for violations because of the complexity of regulations. The regs likely discourage some anglers from taking up trout fishing. The proposed regulations for wild and stocked classifications go a long way in simplifying trout stream regulations and reducing special regs.

Many streams are their own unique ecosystem and may need individual management. Over time, with this plan, those stream in need of special regs can be finetuned.

Year around trout stream fishing with catch and release, Oct. 15th – April 1st is strongly supported. A large majority of anglers fishing during this time period are accomplished anglers

who often practice catch and release. This would give anglers a legal opportunity for more hours of recreational fishing.

Some marginal streams stocked with trout not suited for holdovers or long-term survival become put and take, but anglers catch fish from these streams so this provides recreational opportunities. Recreational opportunities are one goal of the plan for domesticated trout.

Spreading the stocking of trout out over a period of time in certain reaches also adds recreational opportunities. When people catch fish, they come back again. The goal, recreation and recruitment of trout fishermen.

Hatchery fish are limited by pounds of fish that can be safely raised. Raising fewer fish to larger size equals same pounds of fish. Larger stockers would likely have an increased chance of survival and anglers always like larger fish. Could end up a case where less becomes more.

The 2-year-old brown trout have been a real positive for NYS trout fishing. As said before, anglers like large fish. Releasing 12" fish in each stocking would be a plus. Stocking 12" fish at different locations would spread the opportunity for more anglers to experience the 2-year-old fish.

Anglers have commented on expanding the 12" fish to rainbows and brook trout. The idea of a sterile rainbow for limited stockings should also be a plus.

Improving the brown trout for stocking is definitely another plus. Any increase in survival means more recreational value.

NYSDEC has a long history of providing very informative publications to assist anglers in their pursuits. A publication with the stream opportunities, including maps, would be well received by anglers. The maps should provide information on the PFR streams and locations. PFR is a success for access, a real feather in the cap for the DEC. More PFR should also be a priority for the Stream Trout Plan.

The wild fish reaches should be listed in a publication and also by stream signage to educate the public. These wild fish are a treasure that offers anglers a very rare opportunity. Fishing ethics for these fish should also be encouraged. Wild fish management and protection of their environment are an important priority.

142) More access . Especially Fishers in Ontario County

143) Trout Unlimited (TU) welcomes and commends the New York State Department of Environmental Conservation's (NYS DEC) Trout Management Plan (the Plan) as a new approach to trout management. We believe that the Plan is appropriate and reflects the thoughtfulness and scientific rigor of DEC staff. The mission of Trout Unlimited is to conserve, protect, and restore North America's coldwater fisheries and their watersheds. The long-term goal implicit in our mission statement is achieving self-sustainability of salmonid populations.1 TU fully supports the guiding principles of the Plan to strive for self-sustaining populations of wild and native trout through habitat restoration and refining stocking practices while providing a diversity of fishing opportunities across the state. TUs strategy in providing feedback on the Plan is indicative of our organization's national, state, and local structure. National and state responses focus on broad commentary, while local chapter level responses focus on watershed specific concerns. At all scales, TU is unified in its vision to protect and restore coldwater fisheries and their watersheds so our children can enjoy fishing in their home waters. Our feedback on the Plan is designed to be constructive, with the desired goal of supporting or recommending additional strategies or considerations that will not overwhelm its implementation. Our recommendations are based on

existing TU policy, driven by science and a passion for maximizing both the ecological and recreational potential of New York streams. I. Analysis a. Wild Stock Management TU supports NYS DEC's new stocking management strategy and approach that is designed to promote and maintain abundant wild trout, while also providing diverse opportunities for wild trout fishing. One of TU's significant concerns is the ecological interactions between wild and stocked fish, since it has been found that hatchery stock can suppress wild populations through increased predation on, or competition with, wild fish (Hilborn 1992, Fresh 1997). We believe 1 TU's North American Salmonid Policy provides general guidance for our actions as an organization. The policy is based on fundamental scientific principles that focus on the importance of biological diversity and ecosystem processes in a watershed context, the connections between salmonids and watershed ecology, and the changes in populations and habitats over time and how understanding these changes can lead to effective trout management. These general principles highlight the need for thriving, diverse stream ecosystems that support and promote selfsustaining wild and native trout populations. Trout Unlimited 1997. Trout Unlimited's North America Salmonid Policy: science-based guidance for 21st century coldwater conservation. Trout Unlimited, Arlington, VA 22209 (USA). eliminating stocking in 'wild' designated streams will go a long way towards statewide trout population recovery, which in turn will improve fishing throughout New York. The wild trout management categories (wild, wild-quality and wild-premiere) are inclusive of a variety of stream reaches from small brook trout dominated headwaters to larger high-quality streams. The elimination of stocking over wild populations of trout in many streams as a result of the Plan is a significant step for coldwater conservation that should be celebrated and not overshadowed by our additional suggestions and recommendations. The commitment to designate wild and stocked streams and the inclusion of habitat restoration within the Plan demonstrates NYS DEC's commitment to achieving a challenging balance between maximizing both recreational and ecological potential. We believe that this strategy supports several guiding principles: (i) high quality aquatic systems should be managed to preserve their ecological potential as a wild trout fishery, (ii) lesser quality habitat should be stocked to maximize recreational potential and (iii) habitat restoration should focus on restoring conditions to support a thriving wild trout fishery further expanding on the recreation and economic potential. To further expand wild trout population recovery, ecologically appropriate harvest limits and spawning impacts should be considered to ensure sustained natural survival and reproduction. Concern over a year-round catch and release season is being echoed in several watersheds in the Catskills, from Willowemoc Creek to the East and West Branch Delaware River and elsewhere in watersheds throughout New York. Local anglers and conservationist are concerned about the unintended impacts on wild trout population recovery if spawning is interrupted or redds are destroyed. Although it is noted in the Plan that other states may have less restrictive harvest rates and open fishing seasons,2 we believe that reducing environmental regulation in order to simplify a process without sufficient data may have the potential unintended consequence of hindering the stated objective of wild trout population recovery and may ultimately be counterproductive. Climate change impacts in New York could potentially compound existing natural stressors and increase their cumulative impacts on trout populations,3 further adding to the need to be prudent when reducing environmental regulations that could impact trout reproduction.4 Using the 'wild' trout categories may be a simplified means to define fishing seasons and would be consistent with the management objectives for these categories. In addition to judicious deregulation, data collection and monitoring to better quantify angler pressure and impacts on trout spawning 2 The argument for year-round fishing cites an example from headwaters streams in Pennsylvania, where adult Brook Trout abundance was not affected by year-round fishing (Detar 2014). However, these headwaters had no harvest season through the year and had relatively low fishing pressure – PA's small wild trout streams angling pressure is typically low, between 18 and 50 h/acre (Greene et al. 2005). 3 In New York the annual average temperature has risen 2.4 F statewide since 1970, and annual average temperatures increasing in all regions of the state combined with increased precipitation is expected to continue with more frequent intense storm events. Climate change often acts to compound existing stressors and increase their cumulative impacts (Williams et al. 2015). 4 Another example was from the Yellowstone River, where 60% of redds were protected from wading within 12 km of the river closed to angling until July 15th (Kelly 1993). Today, the

Yellowstone River is closed from the first Sunday in November to July 15th. success could also be incorporated in watersheds where potential impact and concerns may be the greatest. As stated above, TU believes that categorizing streams by 'wild' versus ‘stocked' is an inspired method for describing and highlighting opportunities for distinct stocking practices and trout fishing experiences. It also highlights an intent to focus on and develop a comprehensive management strategy for wild trout. However, reach-specific management may introduce unnecessary complications if the end goal is to achieve a self-sustaining trout population that depends on entire watersheds to thrive. It is well understood that the watershed is the basic landscape unit in which management of trout and other aquatic species should be undertaken. Although we understand NYS DEC’s jurisdiction falls on public land or private easements only, which limits your ability to act more broadly, consideration of watershed scale categorization may further simplify the process and expand the potential to meet wild trout population recovery. Connected streams from mainstem to the headwaters are necessary to support self-sustaining trout populations; to ensure that trout can find new habitat, gain access to suitable spawning grounds (Gowan et al. 1994, Fausch and Young 1995), recolonize habitats following catastrophic events (such as flooding or drought), seek access to winter refuges (Chisholm et al. 1987) and find summer thermal refuge (Kaeding 1995). The Plan focuses on biomass data to support higher ‘wild' categorization. In order to better represent the importance of tributaries for wild trout population recovery, a broader watershed scale could replace the more prescriptive approach outlined in the Plan. For example, ‘wildpremiere’ streams should be connected to no less than ‘wild-quality’ tributaries, regardless of the existence of biomass data. Using the East Branch Delaware River as an example, NYS DEC could classify all tributaries to the East Branch as ‘wild-quality’. This would have the compounded benefits of simplifying the categorization process and providing greater protection to the tributaries. Wiscoy Creek (wild-premiere) and the North Branch Wiscoy Creek (wildquality) are good examples of this consistency in categorization and demonstrates the important connection between mainstem and tributary. b. Stocked Trout Management TU supports NYS DEC’s new stocking management strategy and approach that is designed to reduce stocking on streams that can support a wild trout fishery, while providing diverse and prolonged fishing opportunities for anglers. TU understands that hatchery production and stocking may be necessary in some places where the causes of population decline such as poor habitat and inadequate hydrologic conditions may limit natural recovery (Frissell and Nawa 1992, Meffe 1992, White 1992, Lichatowich et al. 1995, Stanford et al. 1996). NYS DEC is presenting a comprehensive plan that includes targeted stocking to maximize the recreational opportunity, designated wild streams to promote natural recovery and habitat restoration to expand recovery of wild trout populations in areas where degradation is the cause of the declining population. The Plan appears to limit these potential impacts of stocking over wild trout populations through the categorization of reaches as either 'wild' or ‘stocked’, however, reach-scale management may not be successful at reducing the impacts of stocked trout if different categorized reaches are connected. Adopting a watershed approach when designating wild and stocked reaches could reduce the potential conflict and impact on wild trout population recovery. As an example, recovery of a wild trout fishery in the Battenkill watershed may be negatively impacted by the designation of a ‘stocked-extended’ reach between ‘wild’ and ‘wild-quality’ reaches on the mainstem. It is unclear if stocking numbers will increase in streams where wild populations are thriving, or wild trout recovery is a desirable outcome. Increasing pressure and competition by increasing stocked trout numbers may negatively impact popular wild trout fishing opportunities. Stocking pressure on existing wild populations should be reexamined and monitored to ensure that new stocking practices do not negatively impact wild trout sustainability and recovery. c. Habitat Restoration TU strongly supports the inclusion of habitat restoration in the Plan, which is aligned with TUs vision and goals. Habitat is central to the distribution, abundance, and sustainability of trout populations, and is necessary to achieve self-sustaining wild and native trout populations in New York. High quality stream habitat is evidence of a healthy watershed while compromised habitat is frequently a symptom of larger scale degradation. Sedimentation, eroding banks and warm water can be viewed as site-specific habitat deficiencies, but site-specific insufficiencies are indicators of larger systemic problems.5 In order to truly improve habitat, the external influences affecting New York streams must be acknowledged and

well understood to establish the correct techniques and scale of restoration effort. Common causes of habitat loss include climate change, land use and stream alterations, undersized and decrepit infrastructure, roads, dams and other anthropogenic influences. Each component can contribute to a domino effect resulting in overall habitat loss and stream degradation. For habitat improvements to be effective, stream stability needs to be adequately addressed by considering the site within the context of the entire watershed. This type of analysis helps reveal the root causes of the degradation. In this context, both public and private lands play a critical role in the sustainability of natural stream function as well as securing and supporting a healthy trout fishery. Restoring floodplains, replacing undersized culverts and stabilizing banks provide additional benefits for communities struggling with frequent and more intense storms. Watershed-scale goals designed to meet multiple objectives expands the opportunity for diverse funding and partnerships. Habitat restoration has the potential to move streams from a stocked 5 It is well understood that habitat is more than the static physical structure of the environment; dynamic destruction and recreation of local habitat elements are central to maintaining high native biological diversity and ecosystem integrity (Poff et al. 1997). The dynamic natural of streams is part of the “template” to which trout and other species are adapted (Minshall 1988, Poff and Ward 1990, Reeves et al. 1995, Stanford et al. 1996). Recognizing the importance of habitat dynamics and methods for restoration requires that habitat be considered at more than simply the local-reach scale. management strategy to a wild trout management strategy and should be considered where both ecological potential and local buy in exists. Partnerships with conservation groups such as TU, Land Trusts and others already working with private property owners and local municipalities can magnify efforts to create community wide benefits at the watershed level. With this in mind, we believe that focusing on watersheds with strong local support, multiple partners, adequate state and federal funding and high ecological potential will provide the greatest return on public investment. d. Angling Opportunity TU believes that if you take care of the fish, the fishing will take care of itself. This Plan demonstrates the important balance needed to provide exceptional trout fishing opportunities in New York. TU supports the addition of Public Fishing Rights that are designed to expand opportunities for public access and diverse fishing experiences. Through the strategies outlined in the Plan and the concentrated efforts for NYS DEC and your partners, we believe angling opportunities will be expanded and improved. The local communities that rely on the trout fishing economy will also benefit from an increase and focus on wild trout population recovery which can be a draw for many anglers. II. Recommendations Recommendation #1 – Expand management from reach to watershed scale to maximize habitat continuity and recovery of wild trout population while focusing on the watersheds with the highest ecological potential to protect and restore. Recommendation #2 – Expand protection and consideration of headwater streams as a critical link in the recovery and sustainability of native trout populations that may be more intensely impacted by climate change. Recommendation #3 – Focus on the tributary benefits to achieving wild trout population recovery and increase tributary protection through higher quality categorization consistent with the mainstem management strategy. Recommendation #4 – Provide protection of wild and native trout during spawning through identification of spawning habitat and development of fishing season regulations designed to protect natural reproduction in order to maintain or improve self-sustaining wild trout population recovery. Recommendation #5 – Ensure that 'stocked' or 'stocked-extended' categories are appropriate within the watershed context and that new numbers of stocked fish do not impact the existing wild trout population. Recommendation #6 – Consider watershed scale when planning, funding or prioritizing habitat restoration. Consider both private and public lands in the restoration strategy supporting the idea that connections across the landscape are critical to trout recovery. Recommendation #7 – Develop a monitoring and an adaptive management strategy to assess the effectiveness of management actions to ensure that the regulations set forth achieve the desired goals of the protection and enhancement of a wild trout fishery. Recommendation #8 – Work between agency departments and bureaus within NYS DEC to identify and reduce the unintended hurdles to promote wild trout population recovery and minimize the roadblocks that slow and impede the ecological restoration process. Examples include; historic preservation and wetland regulations and laws that prevent or slow dam removal projects; water quality requirements that require de-watering construction measures on

restoration projects that are expensive and counterproductive; and an ineffective water quality reclassification process designed to protect trout. * * * TU recognizes that any policy or plan based on the best scientific knowledge available will contain some uncertainty. And although imperfect knowledge is no excuse for inaction, lack of data should also be considered when modifying more restrictive measures. We would like to stress the need for adaptive management strategies and for conservative action that does not preclude future options (including reversing previous actions) when new data becomes available. In the face of uncertainty and where the risk to the resource is deemed high, TU advocates for the best science in order to maximize protection of trout, habitats, and ecosystems. TU continues to be a strong supporter of DEC's work and dedication to improving New York trout streams. We have many dedicated members that are willing to assist NYS DEC on a variety of tasks from monitoring to habitat restoration. TU is already working closely with NYS DEC staff in many watersheds of New York and we look forward to expanding opportunities for us to partner together to achieve our mutual goals.

144) I would like to start by thanking you and DEC for undertaking this daunting and far-reaching project.

Following are my comments regarding the new Inland Trout Stream Management proposals.

We know that the Esopus Creek and it's tributaries have a healthy, consistent and self-sustaining population of wild trout- especially the rainbows.

Therefore, I strongly believe DEC should change the Esopus Creek stock extended designation to
Wild Quality.

Based on the public feedback from the DEC Trout Management Summary….

Page 2 – under results
"the set of desired outcome…. It was possible to identify the top "five"

- high quality stream habitat
-opportunity to catch wild trout and to a lesser extent stocked trout …..
Page 15 Wild Trout

-"the opportunity to catch wild trout was expressed frequently as a desired outcome at most meetings" (13 of 16)

-"a catch rate was generally viewed as ill-suited to measure success in a wild trout stream"

and DEC's stocking policy objectives and outcomes, how does stocking the Esopus with 19,000+ fish (most in the state) meet the desires and outcomes as expressed by the wild trout feedback from the public?

Stocking, high angler usage and angler success should NOT be the objectives of a management plan for a stream with a healthy self sustaining wild trout population.

Today does DEC know how many adult wild trout are in the Esopus? DEC's own internal memo from 1976 cited more than 110,000 below the portal. That is 9,400 per mile and even with all the changes to the stream and some original inaccuracies, I am sure there are at least 300 adult wild trout per mile in the Esopus today.

Citing the Esopus Creel Survey and Electrofishing Survey 2010 -13 it was apparent that the wild rainbow population was negatively effected by Hurricane Irene. Also, the report seems to focus

on FOST & CROTS and was DEC's stocking policy successful on the Esopus, not on what fish populations were present and therefore what should be the stream management plan. And lastly from page 19 - "as previously stated the second increment returned **poorly** through out the season in all sections for unknown reasons" Today I think DEC knows the reasons.

Further, I live a mile from the Esopus Creek and have fished it steadily for over 20 years. Though not scientific this experience leads me to conclude that there are at least 300 adult wild trout per mile in the Esopus today.

Does DEC find any validity in testimony from around the country – Washington, Montana, Michigan, Pennsylvania and Maryland - that when they stopped stocking the wild trout population increased dramatically.

In 1940 Commissioner Osbourne addressed the Sullivan County sportsmen. He promoted the idea that better fisheries management, not more stocking was necessary to improve the sport. Trout were stocked for years yet fishing did not improve. Stricter regulation was a key. He focused on restoring a wild trout fishery – give nature a chance. The department was already spending more money on trout propagation than could be justified.. Stocking more trout offered temporary success but in the long run was expensive and unsatisfactory. (Trout Streams in the Catskills by Ed Van Put pgs. 361 & 362)

I did not happen!

So this is where DEC and we are again 80 years later. Should we continue to pursue the same unsuccessful methods or do we listen to the new angling voices that want change and bold decisions and are willing to stand behind DEC doing that.

Although I applaud DEC's effort to move away from CROTS to a more biological (wild trout) management plan, I disagree with DEC classifying the Esopus Creek as stock-extended.

Therefore I am strongly appealing to DEC to change the reach classification of the Esopus Creek to
WILD QUALITY.

145) I think the new proposed regulations are a great step In the right direction!

146) I think this plan is a great step forward.

I would very much like to see Brook trout flourish where they can.

It sounds like the stocking plans will now work to not stock browns/rainbows in streams near to where wild brook trout flourish.

As an example...Fir Brook which feeds into the Willow...sustains a wild population of brook trout yet in the past the stream has been stocked with browns..and/or the Willow near to Fir and its own headwaters has too been stocked...I would like to see that type of stocking stop. Browns will find their way up into the headwaters naturally on their own...we don't need to help them.

The creel limits for the wild categories I can live with (I lean no kill on Brook trout)...but have you thought about making the creel limit on brown or rainbows in the wild brook trout streams unlimited? Why not use anglers to help control the population of the "invasives"?

My other concern and question is I did not see any mention of regulations in the wild zones to exclude bait fishing? Did I miss that or is that in the cards?

147) On behalf of the Trout Unlimited (TU) Battenkill Home Rivers Initiative (HRI) Working Group, we are pleased that DEC has taken the initiative to formulate a comprehensive New York State Management Plan for Inland Trout. DEC's shift in focus to wild trout management –

specifically, preserving and restoring habitat for wild trout – is commendable. Our focus on restoring the Battenkill watershed provides a unique perspective from which we can make recommendations and contribute to the goal of improving habitat for sustainable wild and native trout populations. After reviewing the new management plan, there are a few key points that we believe require additional thought and consideration: 1. Reach-Level Management: ► Comment: Watershed-based management is the preferred method of TU; this broader approach considers the importance of an interconnected system to sustaining and recovering wild and native trout populations. Managing streams on a reach scale leads to habitat fragmentation and creates additional management challenges. ► Suggestions: (1) The final plan should contain a well-defined data-driven process for designating reaches. (2) Explain the basis for breaking reaches at specific locations (e.g., describe the criteria for designating the upstream side of a bridge a 'Wild' reach and the downstream side is 'Stocked-Extended'). (3) Avoid dividing reaches designated as 'Wild', 'Wild-Quality', or 'Wild-Premiere' with 'Stocked' or 'Stocked-Extended' reaches. 2. Harvest Regulations: The Plan proposes both 'Wild' and 'Stocked' reaches will have a 5 trout/day harvest limit, with no more than 2 over 12 inches. Subsequently, 'Wild-Quality' and 'Stocked-Extended' reaches will have harvest limits of 3 trout/day, with no more than 1 over 12 inches. One reason for doing so is to "minimize the complexity of regulations for anglers and law enforcement". ► Comment: One of the categorical differences between 'Wild' and 'Wild-Quality' is the biomass of trout. If the goal of the new management plan is to ultimately upgrade reaches towards 'WildQuality' and 'Wild-Premiere', the idea of harvesting a greater number of fish from a lower quality reach (and likely a smaller stream, with lower carrying capacity) may not achieve that stated goal. ► Suggestion: In order to still "minimize the complexity of regulations", we propose making both the 'Wild' and 'Wild-Quality' reaches consistent at 3 trout/day, no more than 1 over 12 inches AND 'Stocked' and 'Stocked-Extended' reaches consistent at 5 trout/day, no more than 2 over 12 inches. 3. Upgrading Stream Reaches: It is commendable that this management plan was designed with the intention for habitat improvements to bolster stream reaches' ability to sustain higher numbers of naturally reproducing, wild trout populations - to warrant an upgraded classification. ► Comment: Within the document, there is no outline for a process to reclassify reaches. Our fear is that this over-arching goal can be lost or missed over time, without the proper checks and balances in place. ► Suggestion: Please consider outlining a process for upgrading reaches (sampling schedule, habitat improvement needs, etc.). This should also include a sharable list of the highest priority reaches for restoration work that would likely result in adequate biomass for an upgrade from 'Wild' to 'Wild-Quality'. Partners, such as TU, will then be better equipped to target reaches with the greatest potential. *See point 5 for additional details on identifying "Issues, Goals, Objectives, and Strategies" as a critical component of a management plan. 4. Year-Round Fishing: One of the most significant changes in the new management plan is opening all of New York's waters to trout fishing year-round. There are papers cited that have observed no impact on reproductive success, but I believe this should be monitored on a case-by-case basis. Further, citations used in the draft plan are not applicable to all waters within the state of New York. ► Comment: The literature cited for this regulation is not applicable to all inland trout waters of New York. Detar et al. (2014) studied the effect of year-round catch and release fishing on adult Brook Trout abundance. While adult Brook Trout abundance was unimpacted, Pennsylvania wild trout streams are in largely undeveloped headwaters, receive low angler pressure, and have very low harvest regardless of regulations (Greene et al. 2005). Another citation was from the Yellowstone River, where a graduate student was monitoring the impact of angling pressure on wading-caused mortality of Yellowstone Cutthroat Trout and pre-emergent fry (Kelly 1993). The study area contained 12 km of river that were closed to fishing from the first Sunday in November to July 15th (the current regulation for the entire study area), wherein 60% of spawning redds were protected. Wading-caused mortality was observed at 57.4% in their upper study segment, where angling pressure was the greatest. ► Suggestion: This needs to be evaluated and monitored on a case-by-case basis. Systems with higher angler pressure will be more impacted by wading-caused mortality. Other concerns for the spawning, adult populations must also be considered (increased stress, post-catch mortality, etc.). 5. Management Plan Format and Content: Fisheries management plans should be designed to work towards and achieve specific goals that have been identified in response to issues. Current trout

management plans in other states are designed such that data (from that state) are being used to identify issues and establish goals, objectives, and strategies to address those issues (Bonney 2009, Kirn 2018, Reeser 2018, WDNR 2019, Detar et al. 2020). ► Comment: The objectives and strategies contained in the draft document are mostly aimed at the classification of reaches and the harvest potential established for them (without supporting data). This falls short of responsible management, wherein strategies to monitor the effectiveness of regulations are outlined. Additionally, there are no strategies for addressing habitat concerns, identifying reaches with the greatest potential to be upgraded, or the process for sampling and upgrading reaches. ► Suggestion: Outline goals, objectives, and strategies to achieve specific management goals. Identify a process of adaptive management in which the proposed plan can be adjusted as data reveal how specific watersheds and/or reaches respond to the new management scheme. Battenkill Specific Comments: Reach-Level Management o Reaches on the main stem of the Battenkill are poorly described within Appendix 2. The HRI Working Group believes they are meant to be described as follows (downstream to upstream): a. ½ mi downstream of Battenville bridge (Rt 61) – ½ mi upstream of Battenville bridge (Rt 61) *Stocked-Extended* b. Whitaker Brook – mouth of Black Creek *Stocked-Extended* c. Mouth of Black Creek – Rexleigh bridge *Stocked-Extended* d. Upstream of Rexleigh bridge – downstream side of Shushan steel bridge (Rt 61) *Wild* e. Shushan steel bridge (Rt 61) – Eldridge Swamp *Stocked-Extended* f. Eagleville bridge upstream 2 miles – Hart Hill Rd *Wild-Quality* o The following reaches on the mainstem of the Battenkill were left uncategorized. Gaps along the main stem will cause management and enforcement problems. The river downstream from ½ mile below the Battenville bridge ½ mile upstream of the Battenville bridge to Whitaker Brook Eldridge Swamp to Eagleville o Disconnecting the above reaches (d) and (f) that are 'Wild' and 'Wild-Quality' with a 'StockedExtended' reach is counterintuitive to wild trout management and adds complexity to regulations when part of the goal for the new management plan is to reduce the amount of regulations. o The reach from Hart Hill Rd to the NY/VT line is left unidentified within either Appendix. As this is part of the current special regulation section, it (and the reach from the Eagleville bridge to Hart Hill Rd) should be grandfathered into the new plan as a year-round catch and release only (artificial lures only) reach. o Reaches with public access, not included in Appendix 2 are to be managed as 'Wild'. Camden Creek is one such tributary with importance as coldwater refuge, native and wild trout habitat, and spawning grounds that would benefit from a watershed management approach. We believe the importance of Camden Creek to the wild fishery within the 'Wild-Quality' reach of the Battenkill (of which it flows into) is justification for 'Wild-Quality' classification as well. If the special regulation section is grandfathered into the new plan, Camden Creek should also gain such status. Camden Creek is also one example of how a watershed approach can benefit the fishery and simplify management. Harvest Regulations o Recovery of a wild trout fishery throughout the Battenkill watershed will depend upon the survival of adequate numbers of wild fish. The 'Wild' regulation (on reach d above) of 5 trout/day (2 over 12") will not encourage the biomass within that reach to trend toward 'WildQuality'. Further, the reaches upstream and downstream are to be classified as 'StockedExtended', which imposes the lower harvest restriction of 3 trout/day (1 over 12"). o Another example: the proposed regulation shift at Rexleigh bridge poses a management challenge. Thus, the 'Wild' reach harvest restriction should also be 3 trout/day (1 > 12") or the 'Stock-Extended' reach should break upstream of the pool at Rexleigh bridge – at the old dam. o Stocking numbers add complexity to the issue of management and harvest restrictions: The proposed quantity of stocked trout is 22,968 for 6.2 miles (3,704 trout per mile) of 'Stocked-Extended' reaches of the Battenkill. If a 'Wild' reach is not 'Wild-Quality' because it is limited by habitat, low productivity, and/or has a trout biomass less than 300 yearling or older trout per mile, why allow harvest of 5 trout per day when reaches stocked with approximately 3,704 trout per mile have a harvest restriction of 3 trout per day? o Please consider rethinking the harvest restrictions for 'Wild' reaches and how to classify reaches based on those upstream/downstream/adjoining (thinking of a connected watershed). Upgrading Stream Reaches o In Appendix 2, the reach from the Eagleville bridge to Hart Hill Rd is currently identified as 'Wild-Quality'. Habitat improvements just upstream, in Vermont, have shown the potential to support 'Wild-Premiere' numbers of trout per mile. This emphasizes the potential for TU's restoration work within the reaches upstream of Eagleville bridge on the

mainstem and tributaries (e.g., Camden Creek) to bolster wild numbers adequately to upgrade those waters to 'Wild-Premiere'. o With the investment of time and resources by Trout Unlimited and other partners in the Battenkill watershed (and elsewhere throughout the state), our hope is that a partnership with DEC in bolstering wild reach classifications will be the new normal. □ Year-Round Fishing o Vermont has opened some larger rivers to year-round fishing, but the Battenkill remains one such that large runs of spawning trout warrant the closed season to preserve the quality fishery (Kirn 2018). Additional studies are referenced in the Vermont Management Plan that indicate movements by wild trout for habitat and spawning can be extensive. Telemetry studies of adult brown trout in the Battenkill led to the conclusion that even a 2-mile special regulation reach was inadequate to protect wild fish (Cox 2016). o Redd surveys conducted annually, beginning fall of 2020 - as part of the Battenkill HRI, will be shared with NYS DEC and should be used to guide reach/watershed closures through the spawning season. The future of New York State's wild and native trout fisheries will largely be affected by this plan, and we are uniquely in a time that decisions made today will have profound impacts over the next 5-10 years. Proper management, monitoring, and implementation are vital to the preservation and protection of our wild trout fisheries. This emphasizes the importance of a well-defined approach to measure effectiveness of strategies applied to achieve goals and modify those strategies as we learn more about their impacts. Our efforts in the Battenkill watershed can contribute significantly to the goal of this plan to promote wild and native trout fisheries. We look forward to partnering with DEC to improve habitat, fishing, and overall ecosystem resiliency. If there is any way for a representative of the TU Battenkill HRI Working Group to become involved as a member of the Fisheries Management Plan for Inland Trout Streams in New York State Focus Group, please let us know. Thank you for considering these comments as you revise the draft management plan. I look forward to reviewing a revised management plan that addresses these concerns. Sincerely, Jacob A. Fetterman Trout Unlimited, Project Coordinator Battenkill HRI, Northeast Coldwater Habitat Program

148) My wife and I have enjoyed this spring trout fishing here in Wappinger falls area I think the larger fish are definitely more desirable and delicious for dinner.
keep up the good work

149) The meeting was both informative and enlightening for me.
The discussions and explanations regarding categories and stream designations were particularly instructive.

Participants were invited to submit questions at several intervals.
Unfortunately, I am not very tech savvy and was unable to submit a question I had. The way to submit a question might have been reviewed once or twice more during the presentation.

Although climate change and various environmental influences had been reviewed , I wanted to ask if there has been a recent study on the affects of Acid Rain on NYS watersheds and what the study might have accomplished.

Thank you for a job well done.

150) As a member of Trout Unlimited, I wanted to thank you for the hard work and effort on the Draft Fisheries Management Plan for Inland Trout Streams. The draft plan clearly shows an improved approach towards managing this important resource. There are several recommendations from the New York State Council of Trout Unlimited that I support and would ask to be considered. Specifically, this includes:
• Expanding management from reach scale to watershed scale to maximize habitat continuity and recovery of wild trout populations.
• Expanding protection and consideration of headwater streams as a critical link in the recovery and sustainability of native trout populations.
• Focus on the tributary benefits to achieving wild trout population recovery and increase tributary protection.
• Provide protection of wild and native trout during spawning through identification of spawning habitat and development of fishing season regulations designed to protect natural reproduction.

• Ensure that “stocked” or “stocked-extended” categories are appropriate within the watershed context.
• Consider watershed scale when planning, funding or prioritizing habitat restoration. Consider both private and public lands in the restoration strategy.
• Develop a monitoring and an adaptive management strategy to assess the effectiveness of management actions.
• Work between agency departments and bureaus within NYS DEC to identify and reduce the unintended hurdles to promote wild trout population recovery.
Please consider these important recommendations as you begin to finalize the plan. Thank you again for all your hard work.

151) See comment #150
152) See comment #150
153) See comment #150
154) If I am reading the proposed draft correctly I believe the draft proposes to change the current regulations on Skaneateles Creek. The draft shows Skaneateles Creek as a "stocked" fishery which would be stocked once I year and as such allow harvesting 5 trout, with only 2 being 12 inches or greater.
If the above is correct it changes Skaneateles Creek, (10.2 miles of it), from a no kill, artificals only stream. This section is the only local no kill stream that I know of and I believe one that should remain as such.
So I strongly disagree with the draft proposal as it applies to Skaneateles Creek. I understand that one reason the organization's involved at the time were able to obtain landowners permission to allow access to the stream was because of the "no kill" regs and the type of angler that are attracted to this type of fishery. I believe that opening this stream up to daily trout harvest will have a negative impact on available access. This is one of only a couple of streams that I fish were I regularly find/catch small, (3 to 5 inches), wild brown trout. Why this stream is not part of the wild program of the new proposal is beyond my understanding.
155) See comment #150
156) See comment #150
157) See comment #150
158) See comment #150
159) See comment #150
160) See comment #150
161) See comment #150
162) I write this letter of support for the Draft Fisheries Management Plan for Inland Trout Streams on behalf of the Twin Tiers Five Rivers chapter of Fly Fishers International. Our chapter is composed of 72 members in the Corning/Elmira NY area, which is a branch chapter of the Fly Fishers International. Our members are dedicated to education and advancing the sport of fly fishing, along with conserving our fisheries.

Our chapter has been following as NY state developed this new policy, first giving input at the Hammondsport NY public meeting a few years back. We have been able to participate with ongoing input as the process developed.

Our club is strongly supportive of the new plan's migration away from solely managing our trout waters and its stocking to achieve catch rates. We are highly supportive of the vision of the new plan's emphasis on habitat improvement, wild trout, approaches to extend the stream lifetime of stocked trout, year-round season, and the diversity of stream experiences.

We are strongly supportive of the directions outlined in the fish culture section. Namely to stock larger fish and to develop stocked strains more likely to extend their lifetime in streams.

It seems the harvest limits on wild stretches in the proposed plan is overly liberal and challenges the desire to manage these for maximum habitat potential. These limits are based on the

presumption that these stretches receive only light pressure, so liberal limits are of little real consequence. However, we expect that fishing pressure is unpredictable - and some sportsmen discover populations and will 'fish-them out." We would encourage DEC to reduce harvest rates or eliminate them completely on wild stretches to discourage the potential to reduce populations by over harvesting of these coveted watersheds.

We are supportive of more frequent stockings for Stocked-Extended stretches. We would like to encourage the DEC to also leverage the use of float stocking for widest possible distribution of fish. Our chapter has supported float stocking efforts on the Cohocton River for over 20 years. We believe that float stocking could contribute greatly to the goals outlined for Stocked-Extended stretches. We would expect staffing and equipment for float stocking could be developed with strong partnership with local volunteer organizations such as TU, FFi, and others. With DEC commitment to float stocking whenever possible, creative solutions for rugged and safe watercraft means to enable it could be developed and potential shared across regions, either by individual volunteer groups, coordination between groups or even DEC coordination.

We are highly supportive of the DEC increasing focus on public access. This is key concern for our members for the future of our sport. We believe NY is ahead of other states in its landowner easement strategy. We would encourage DEC to amplify efforts to increase public access easements. We believe groups like TU, FFi, and others could be helpful partners in recruiting landowners willing to lease access to their land. This would be predicted by DEC support to quickly complete the access agreements.

In reviewing, the plans for local watersheds - such as the Cohocton River and Genesee - we believe these waters have the potential to support larger areas of wild trout management. It seems the new management strategy may seek this goal, but the means is not clear. It seems habitat improvement and avoiding stocking on top of wild trout, could be helpful in increasing the waters with successful wild trout populations. We would encourage DEC to work toward extending these wild areas as much as possible and to prioritize habitat improvement strategies to maximize benefit of volunteer-led habitat improvements.

We are excited by the positive direction outlined in the Draft Fisheries Management Plan for Inland Trout Streams and have officially adopted a position of support during our June 15, 2020 board of directors meeting. We are encouraging our members to add their individual support during the public comment period. We hope our additional recommendations further enhance the plan.

163) looked over document but really didn't understand it. would have liked to see research done per stream. fisherman go to areas that they like and want to know how healthy it is. I don't care if it's wild or stocked since I enjoy the act of fishing by itself especially fly.

164) First, I wish to applaud you and your team for putting together such a comprehensive plan for our state. I know our waters will be much better managed with this plan in place. Like any comprehensive plan, I realize it must take into account the needs of a diverse group of stakeholders. And the knowledge, views and opinions of these stakeholders change over time.

In that light, I will offer my two cents of opinion for Wild-Premier (non-stocked) Trout Rivers:

- Require Catch and Release Only.
    - Yes, some anglers will be unhappy they can't bring home a fish to eat from their favorite stream,
    - But the State does not have the resources to enforce one trout, or any other number of trout, to be taken. And with Covidvirus, it will be a long time before it does,

    - I have personally seen, and have had to deal with, a number of anglers with strings of trout exceeding DEC catch limits. I know of a substantial number of other anglers who have had the same experience,
    - The State is likely to have high unemployment for some time, making this situation even more risky,
    - Therefore, until the State can provide sufficient resources to enforce regulations on Wild-Premier Rivers, I implore you to change the regulations to Catch and Release Only.
- Require Barbless Hooks.
    - Much research has been done on this, and particularly in high pressure streams, barbless hooks have resulted in lowered mortality among caught fish,
    - Therefore, in order to maintain high quality Wild-Premier Rivers, I strongly suggest that you require barbless hooks.
- Improve Stream Habitat.
    - Particularly in streams without a high degree of natural structure,
    - Work with TU, FFI, FUDR, EBTJV and other conservation organizations,
    - Add boulders, overhead cover and in-stream woody debris,
    - These have all been shown to increase trout biomass in streams,
    - Anglers volunteering for such work will create the comradery on our rivers, and improve overall angler satisfaction with New York Wild-Premier Rivers,
    - Therefore I strongly suggest that DEC reaches out to our various conservation organizations to increase Stream Habitat.
- Increase the Merganser Fall/Winter hunting season.
    - Global warming has decreased the amount of ice on our rivers,
    - Mergansers are staying all winter now,
    - Streams are at low levels in the Fall and Winter,
    - The short Merganser hunting season results in a very low kill rate,
    - These conditions will result in a higher trout kill rate that previous decades in New York,
    - Therefore, I strongly suggest that DEC lengthen the Merganser hunting season from the current two weeks to two months. Particularly in those areas with Wild-Premier Rivers.

Again, I greatly appreciate all the work you have done to get us to this point, and hope that the Draft Plan (substantially as you have written it) is put into our fishing regulations.

165) I've read through the regulations. Everything seems good. I really like the idea of an online tool to find PFR by type. This will help encourage the younger generation of anglers.

166) As a conservationist and an avid trout angler I would like to start off by thanking you for undertaking the effort to update the Inland Fisheries Management Plan for Inland Trout Stream in New York. I am a resident of Saratoga Springs, a board member of Clearwater Trout Unlimited, a member of the Battenkill Home Rivers Initiative Working Group, a member of Backcountry Hunters and Anglers and a former board member of the Battenkill Watershed Alliance.

I understand not every stream has the potential to be a wild fishery. However, I would like to see a greater emphasis on habitat improvement and less on stocking fish, particularly in streams that have self sustaining wild populations of trout or streams with the potential for wild populations if habitat was improved.

Brook trout being the only native trout to New York, stocking of brook trout should be eliminated and the focus put on preserving and enhancing existing wild populations. As an angler, I would enjoy the satisfaction of knowing that every time I catch a brook trout in New York it is a wild fish.

I do not agree with publishing specific dates when a stream is stocked. Anecdotally speaking, freshly stocked trout take a little while to disperse and are highly susceptible to being caught. While it is mentioned in the plan that temporary harvest closures are not feasible, by not providing specific published stocking dates the risk of overfishing is reduced and the chance of trout being able to acclimate to the stream and disperse is increased. Instead I believe DEC should continue to provide date ranges when streams will be stocked. This will allow for a greater angling opportunity than the proposed plan.

Additionally, my sentiments are outlined in the formal comments submitted by the New York State Council of Trout Unlimited and the Battenkill Home Rivers Initiative Working Group including the recommendations below: [see comment #150]

167) See comment #150

168) Hi Fred, is there any ability to add a recommendation component similar to what was just done on the Madison River in Montana to address crowding and access?

The West, East and Mainstem of the Delaware Rivers are overburdened with floating boats, rafts and other devices. It would be nice to see some recognition of this issue and possible solutions to reduce overcrowding, and meet the needs of boaters and wade fishermen. The experience of both wade and boat fishermen has declined over the years due to overcrowding.

Something as simple as only allowing boats and floaters to launch and take out from State owned, paved, and designated launches would provide immediate results.

169) Bob Adams suggested that I contact you concerning Woodland Brook and the DEC's tentative plan to make it a "Wild Quality Stream" in the future. As I understand it, the stream would no longer be stocked, though fishing would still be allowed.

I, as my father before me, have been stocking an approximate 2 mile stretch of Woodland Brook annually. The landowners have agreed to post their land for fly fishing only--any other

reason for being on their property would be considered trespassing. We have bought our trout from the Beaverkill Trout Hatchery ever since we began the stocking in 1965. This is all explained in the attached write-up THE TROUT FUND.

In a nutshell, we feel that prohibiting bait and lure fishing will insure that caught fish will have a better chance being returned to the stream relatively unharmed, to live another day. In other words--it's been our effort to conserve the integrity of the stream and its trout. for over 50 years.

I wanted you to know this, and have some questions about statements made in the draft management report that may need changing.

The report states that the Brook's not stocked. Last year we stocked 200 10 inch, 425 11 inch, and 20 15 inch trout, of which 360 were brook trout and the rest brown trout. We have stocked similar numbers annually.

There's a reference to splitting up the stream categories. I don't understand what this means.

The "resurvey priority" status for the stream is "low." Bob Adams believes this should be changed to "high." I think so too.

I imagine that classifying the Brook as a Wild Quality stream opens its waters to fishing with bait and lures, as well as fly-fishing, which in the long run I believe would be a detriment to the trout population. I would hope that the stream could be made a "fly fishing only" area--benefiting the native trout in the long run.

170) On behalf of my late father, Ernie Schwiebert, it is imperative that we maintain and protect any and all brooks, streams and rivers as "fly-fishing only" preserves. Because of their annual stewardship, this group led by Mike O'Neil has established a fishery with a blend of wild and stocked trout.
It should be protected and classified in the most appropriate way so as to maintain its current status. I know that Trout Unlimited has a new initiative to protect such fisheries as well as water quality and other conservation measures. I am working with the Ernest Schwiebert Chapter of Trout Unlimited in central New Jersey in this light, turning my father's trout drawings into prints (with no proceeds back to me or our family) as a donation to help make this so.

Please work in good faith with this group to best classify and protect Woodland Brook.

171) I write this letter of support for the Draft Fisheries Management Plan for Inland Trout Streams. I am strongly supportive of the new plan's migration away from solely managing our trout waters and its stocking to achieve catch rates. We are highly supportive of the vision of the new plan's emphasis on habitat improvement, wild trout, approaches to extend the stream lifetime of stocked trout, year-round season, and the diversity of stream experiences. I am strongly supportive of the directions outlined in the fish culture section. Namely to stock larger fish and to develop stocked strains more likely to extend their lifetime in streams. I also support more “catch and release only” sections, especially for areas for wild trout, or at least reduced harvesting. I am supportive of more frequent stockings for Stocked-Extended stretches. I would like to encourage the DEC to also leverage the use of

float stocking for widest possible distribution of fish. I am highly supportive of the DEC increasing focus on public access. I would also like to see changes to the laws regarding access to rivers similar to Michigan's policy where anglers are permitted to wade streams and rivers in any area up to the high water mark (and beyond in situations where safety necessitates). This would enable access to greater regions of water that are currently cut off by land owners who own the land on both sides of the river/stream. Allowing land owners to post the bottom of the streams and rivers is overly restrictive.
I thank you for your time.

172) Hello,

I live in Hyde Park and my property line extends into Crum Elbow stream. I have never seen a trout and the proposed sewage plant treatment plant estimate is costing an arm and a leg because it has to cool down water in the stream for the safety of trout.

Are they there?
Where are they?
Where are they put in?
A large log jam shouldn't impact them, but there is one just south of the Dutchess County Water Plant on East Market/Chruch Street in Hyde Park.

I read the draft trout plan report.
https://www.dec.ny.gov/docs/fish_marine_pdf/dfmptroutstream.pdf

and 1,600 brown trout were released in April in Crum Elbow.
https://www.dec.ny.gov/outdoor/23326.html

173) I love the new ideas, with that being said we need more enforcement on the genny in the no kill sections as they have been raped hard this year and in the past. I have called the officers at least 5 times already for guys fishing with bait and keeping the fish. Also the signs should say on them that power bait is not legal to use love to hear back.
Along with the plan which I love the proposals, we should have a delayed harvest just like PA does, and I know this would be very hard, but WE NEED MORE ENFORCEMENT IN WELLSVILLE ON THE GENESEE RIVER NO KILL SECTION. Maybe some deer cameras setup up on the dec parking lot signs, and a wire across the river at start of the no kill at shongo
Would stop the bait guys from taking all the fish out of this sections. I would love to hear back from you

174) See comment #150

175) I write this letter of support for the Draft Fisheries Management Plan for Inland Trout Streams on behalf of the Leon Chandler Chapter of Trout Unlimited. Our chapter is composed of 168 members in the Ithaca/Cortland area, which is a local chapter of Trout Unlimited. Our members are dedicated to cold water conservation and education and advancing the sport of fishing with both fly and conventional tackle. The Chapter has been following as NY State developed this new policy, with members first offering input at the Hammondsport, NY public meeting several years ago. Members have participated, providing ongoing input, as the process for this plan developed.

- The Leon Chandler Chapter of Trout Unlimited is strongly supportive of the new plan's migration away from solely managing our trout waters and stocking practices to achieve catch rates. We highly support the vision of the new plan with its' emphasis on habitat improvement, wild trout, approaches to extend the stream lifetime of stocked trout, year-round season, and the diversity of stream experiences.

- We also support the directions outlined in the fish culture section of the draft plan. Specifically, the philosophy of stocking larger fish and developing stocked strains that are more likely to extend their lifetime in our streams.
- It appears that the harvest limits proposed on wild stretches in the proposed plan is overly generous; challenging the otherwise stated desire to manage these wild streams for maximum habitat potential. The limits are based on the presumption that these wild stretches receive only light fishing pressure, so the limits will have little real impact. We are not certain, and believe that fishing pressure is often unpredictable - and that in this age of social media and “Instagram” posting, some fisherman will discover populations, share them widely, and the resulting pressure

- will essentially fish the stream out. We would encourage DEC to reduce harvest rates or more preferably, eliminate them completely, on wild stretches. This would strongly discourage the potential to reduce populations by over harvesting of these coveted watersheds.
- We support the concept of more frequent stockings for Stocked-Extended stretches. We would like to encourage the DEC to also leverage the use of float stocking for widest possible distribution of fish. While I am not certain of the challenges of this process, I am confident that there are many volunteers in both our Chapter and other local organizations who would be willing to contribute time and resources to this effort. Such an effort could better develop the relationship and sense of partnership between NYS DEC and our local volunteer organizations - such as other TU chapters, FFi chapters, and other groups. With DEC commitment to float stocking whenever possible, creative solutions for rugged and safe watercraft, the means to enable it could be developed and potential shared across regions, either through individual volunteer groups, the coordination between groups or even via DEC coordination.
- We are highly supportive of the DEC increasing focus on public access. This is key concern for our members for the future of our sport. We believe NY is ahead of other states in its landowner easement strategy. We would encourage DEC to amplify efforts to increase public access easements. We believe groups like TU, FFi, and others could be helpful partners in recruiting landowners willing to lease access to their land. This would be predicted by DEC support to quickly complete the access agreements.
- In reviewing, the plans for local watersheds - such as the Cayuta Creek, Owego Creek (all branches), Fall Creek and the Tioghniogha River (all branches) - we believe these waters have the potential to support areas of wild trout management. It seems the new management strategy may seek this goal, but the means is not obvious. Particulary on these streams. Habitat improvement and avoiding stocking on top of wild trout, could be helpful in increasing the waters with successful wild trout populations. We would encourage DEC to work toward developing additional wild areas as much as possible and to prioritize habitat improvement strategies to maximize benefit of volunteer-led habitat improvements.

We are excited by the positive direction outlined in the Draft Fisheries Management Plan for Inland Trout Streams and have officially adopted a position of support during an ad hoc discussion by our executive board this past week. We hope our additional recommendations further enhance the plan.

176) Thanks for the opportunity to comment on the Trout Stream Plan.

I completely and fully support the proposed season limit change to 365 day per year access for trout streams on artificial lure, catch-release basis. This is a fantastic opportunity for those of us that access area rivers/streams on a regular and responsible basis.

I disagree with the assertions that angling pressure is decreasing. At least for those high-quality streams where fly-fishing is the norm, anecdotally I only see increased pressure.

I support any efforts towards less take and more catch and release stream management sections/protocol.

I support the development of an interactive trout stream reach map available online.

177) I've been a resident of Onondaga county for 65 years now, and have been an avid trout fisherman since my early youth, prowling some of the streams of Onondaga county. I've seen and experienced ups and downs during that time, and am encouraged by the

department's efforts to improve the quality of the habitat and inland trout fishing opportunities throughout the state.
I visit different areas of local streams two or three times a week from early April through early October (where permissible), and once a week or so during the winter months as temperatures and weather permit. While I fish all over the state from the Catskills to the Adirondack's, I will limit my observations and suggestions to the streams I frequent in Onondaga county.

- **Skaneateles Creek**. Under the proposed guidelines, Skaneateles Creek will continue to receive stocking under the stocked stream guidelines. Because of contaminants that build up in fish as a result of pollution resident in the stream from years of dumping by manufacturing facilities in Skaneateles Falls, the creek has been a catch and release fishery for many years, over 20, I believe. In that time period, it has been observed that the stream has a well-established wild population of brown trout and rainbows. In my opinion, stocking of rainbows in the stream is no longer necessary to support the fishery, **especially in light of the fact that the fish cannot be kept for consumption**. Browns have not been stocked for quite a few years, yet my records indicate browns to be as plentiful as rainbows on my visits to the stream. The hatchery fish allocated for stocking here would be better placed in other waters.

- **Butternut Creek**. The entirety of Butternut within Onondaga County is currently slated as stocked extended under the new guidelines, with a high rating for re-survey for future classification. Based on my experience, I would suggest the section of the stream (reach) running from the **falls in Jamesville to the I-481 bridge on Jamesville Road** be considered for management as a **wild trout section, (wild quality).** This section of the stream is known locally as the "gorge" section, flowing through a natural canyon section which somewhat limits accessibility as it requires some extra effort to reach the stream. There has existed for quite some time a good wild brown trout population in this area, and I have personally observed many active spawning sites in the stream in November visits in years past.

- **Limestone Creek**. As with Butternut Creek, Limestone Creek within Onondaga County is currently slated as stocked extended under the new guidelines. A very popular stream with a lot of easy public access, it's the stream I cut my trout fishing teeth on 55 years ago. While suffering a bit in certain stretches from erosion issues that resulted from some suburban housing development, there is a certain "reach" that begins at **Edwards Falls upstream from Manlius that runs to the "Highbridge" on route 92 between Manlius and Fayetteville** that has a rather high gradient and a good population of stream bred wild brown trout. With a medium assessment for re-survey, I suggest the above reach be managed as a **wild quality** section rather than the current plan for stocked extended throughout the stream.

- **9 Mile Creek**. Perhaps the most popular trout steam in Onondaga county, and one that receives a greater stocking than any other stream in the county, 9 Mile is currently slated as a stocked extended stream for it's entire length from the origin at Otisco Lake to it's mouth at Onondaga Lake. It has been assessed a low probability of re-survey, most likely because it is the most studied stream in Onondaga county

and the benefit of all the attention that has been focused on it in recent years. Those of us active in the local Trout Unlimited chapter were surprised to learn that no section of the stream was to be managed for it's wild trout fishery, as experience by local fisherman as well as several studies by DEC personnel have indicated a strong wild brown trout population in the "reach" running from **Marcellus Falls to Camillus**. I would also suggest that this section of the stream be managed as a **wild quality** reach under the new guidelines.

178) For many years I have personally done redd count surveys on the Upper Delaware River system which included the tributaries between Lordville and Callicoon. The streams in this section of the river are predominate rainbow trout spawning grounds during the spring of the year that falls between March 15 and May 1st. Streams include Humphries Brook; Abe Lord Creek; Boucioux Brook; Basket Creek; Pea Brook; Hoolihan Creek; Hankins Creek; Little Equinunk Creek; Cooley Creek (PA); Hollister Creek (PA).
The rainbow is a special fish that was first introduced in June, 1881 and has survived for over a century. A few of these streams have been ravaged by floods and channelization and has reduced their numbers in the main stem. It is an important fish for anglers and need to be managed properly if they are to survive.

I would like the NYSDEC trout plan to include Lordville to Callicoon in the cold water fishery plan. The quality of the trout fishery between Hancock and Callicoon will be better protected utilizing proper water releases and stabilized flows by maintain water temperature below 75 degrees F as stated in the NPS Upper Delaware River Management Plan.

This video taken March 15 on a trib below Lordville this past spring.

https://youtu.be/T-SSTtsncRg

Thank you!

179) In response to the proposed changes in NY Trout Stream Plan, I would like to thank you all for the effort that was given to streamline and enhance the fishing in the State.
I am a resident in Equinunk on the Mainstem of the Upper Delaware. I am happy with most of the specifics of the plan as it pertains to our Premier Wild Fishery. While I am not thrilled about the proposed change in the year round fishing addition to the formerly regulated sections of the WB,UEB and related tributaries I don't think that there is enough science out there to make a strong case against the change. I would like to see more enforcement of these new regs but understand that it is not the responsibility of the DEC to enforce. However, it would be nice if the enforcement officers could have a greater presence in the spawning times of the browns and rainbow to make sure folks are following the proposed regs.
What I am asking for you all to consider for modification is the current language that limits the boundary of the Upper Delaware Premier distinction to Lordville on the Mainstem. I watched the Zoom meeting organized by Skelding and FUDR and appreciate hoe you got to identifying Lordville as the reach. I fish the mainstem a lot since my home is located there and can tell you that the stretch between Lordville and Callicoon produces some of the best trout in the system when the weather and releases cooperate. The fish are high quality, hard fighting and often receive less pressure than the other parts of the system. I would ask you to consider extending the reach to Callicoon. One concern that I have is that the decree parties may leverage this boundary of Lordville, if enacted in the new plan, and factor it into

their decisions on releases and possibly misdirect the FFMP as a result. As you know this could adversely affect that part of the fishery.

Appreciate the effort and the opportunity for public comment.

180) I am writing in overall support of the Draft Fisheries Management Plan for Inland Trout Streams. As an avid fly fisherman and member of the Leon Chandler Chapter of Trout Unlimited, I care deeply about the health of our trout streams. I am strongly in favor of management practices that will increase the likelihood of establishing sustainable populations of wild trout in NYS streams with increased public access. I am concerned, however, about eliminating closed seasons. Given the prevalence of sharing of catches on social media, often with location information included, I worry that breeding trout will be targeted for harvest, thus preventing the growth of the wild populations. . I do see the value of simplifying the fishing regulations and recognize that enforcement of complex regulations is difficult (indeed, I think impossible based on the amount of bait fishing and over-harvesting that I have observed in special regulations sections of easy-to-access streams), so I think the current plan is worth a try. However, I would expect some kind of assessment of the success of the plan in a few years and modifications if numbers of wild fish do not increase. I also would like to see more float stocking of streams as this will allow trout to become established in harder to access sections of the streams and, I believe, increase the chances of trout surviving their first season.

181) As a member of both Trout Unlimited and Fly Fishers International and an avid angler, I wanted to thank you for the hard work and effort on the Draft Fisheries Management Plan for Inland Trout Streams. The draft plan clearly shows an improved approach towards managing this important resource.

There are several recommendations from the New York State Council of Trout Unlimited that I support and would ask to be considered. Specifically, these include: [see comment #150]

Additionally, I am concerned that the proposed harvest limits on wild stretches is overly liberal and challenges the desire to manage these for maximum habitat potential. These limits are based on the presumption that these stretches receive only light pressure, so liberal limits are of little real consequence. However, fishing pressure is unpredictable and some anglers who discover these populations will 'fish-them out." I would encourage DEC to reduce harvest rates or eliminate them completely on wild stretches to discourage the potential decimation of populations by over harvesting of these high quality watersheds.

I ask that you please consider these recommendations as you work to finalize the plan.

Thank you again for all your efforts.

182) See comment #150

183) See comment #150

184) See comment #150

185) See comment #150

186) Having lived on and/or fished the Battenkill River for 70 years, I would like to comment on the above plan. As a child I lived and fished the Battenkill just upstream of the Village of Greenwich. I now live and fish ~ 1/2 mi. downstream of the Rt 61 bridge near Battenville. In the interim I often fished various sections of the river. It is my observation that the single most apparent contributor to the current lack of trout is the increase in numbers of predators. On my property I have observed and competed for fish with : river otter, eagle, osprey, mink, king fisher, and a huge number of merganser. Many of these are welcome additions to our environment, but the mergansers eat nearly every trout and compete with the fish for the crayfish that they both consume. When I moved here five years ago crayfish were seen in abundance. This spring we have not seen one.

187) See comment #150

188) See comment #150
189) See comment #150
190) See comment #150
191) See comment #150
192) See comment #150
193) I attended both management meetings in 2017 and 2019 and am beyond excited and pleased with the current proposals for the new plan. I am a firm supporter of wild fish over stocked fish although I don't look down upon stocked fish being that I've contributed over 150hrs of volunteer work to CarpentersBrook Fish Hatchery. I am also an avid supporter of being able to responsibly keep fish without causing much harm to the resource. Although I support all the new proposed changes, hands down my favorite one is the possibility of an all year trout fishery. Growing up as a kid with no vehicle having a trout stream a mere 5 min walk from my house yet only being able to fish it from April-October was a real disappointment since I would rather have the opportunity to catch fish even if I wasn't allowed to keep any during the closed season. My guess would be I'm sure I wasn't the only one. I personally think all these changes will only enhance the already great trout opportunities we have in the state.
194) See comment #150
195) See comment #150
196) The Erie County Federation of Sportsmen's Clubs would like to express its support for the proposed Inland Trout Stream Management Plan. The changes from the existing management plan, circa 1984, have been long overdue. You and the Department are to be commended for spending the amount of time and effort that went into crafting this plan. We would like to thank you for the transparency of the process, and for keeping the public involved every step of the way.
There are many things to be praised in this plan. As a County Federation, representing clubs and individuals who hunt, fish, and trap, we are especially grateful for your continued support of stocking catchable sized trout for the general public, while emphasizing protecting wild trout. Your efforts to provide additional access to the public for trout fishing is to be commended also.
Finally, you have assured us that this is a "dynamic" plan and that consequences will be monitored, and the plan altered if necessary. That is certainly needed for any such mammoth endeavor.

Congratulations on a job well done,
197) See comment #150
198) See comment #150
199) See comment #150
200) Thank you for taking the time to receive input from the public before finalizing the trout management plan. To that end, I will keep it short and just voice my opinion that the Esopus creek in Ulster county IS a wild fishery. I have been fishing it for over 20 years now and always consistently catch wild rainbows and browns in its waters, along with brookies far up near the headwaters. Please reconsider the stocking policy on the Esopus. There is no reason to dump that amount of fish in there. If stocking were reduced and a portion of the river made catch and release, the Esopus would be a fishery on par with the West branch of the Delaware.
201) It would be nice to have at least one NO KILL section on the Cohocton river!
A delayed harvest would be good for at least the first stocking of the season.

202) See comment #150

203) I would like to see more public fishing rights areas and more parking. Access is not great on many streams and rivers. I also would like to see more catch and release areas. The Millers river near Greenfield, Massachusetts is a great fishery and has a significant portion of catch and release. Thank you for soliciting and accepting input.

204) See comment #150

205) See comment #150

206) See comment #150

207) I have reviewed the Draft Inland Trout Stream Management Plan, and found it to be exceptional in every regard! Thank you for following the science, focusing on habitat and native trout, and expanding trout fishing access across the year! I strongly believe this plan will be good for trout and trout fishing for the current and next generations of fishers and New Yorkers!

Thank you for your service to conservation and the future!

208) My question to you is in regards to probable regulation changes for the Upper Delaware System in 2021. The West Branch and its tributaries during brown trout spawning season occurs between November and February. The water flows during that time of year often are very low making the trout redds vulnerable from wading anglers.
I and many of my colleagues believe the open year round season on the West branch of the Upper Delaware could have a negative impact on brown trout during the spawning period between November and February.

Will you consider closing the upper WB and trips during the principal spawning months?

209) A lifelong avid flyfisher, I was very impressed with the draft proposal for management of New York's trout streams. I was especially impressed by your recognition that for many trout fishers, especially fly fishers, you have recognized that what matters most is not at all the pounds per hour or numbers per hour of angling time but many other factors, including "wild" not hatchery reared fish and an ability to fish far from the maddening crowd.

Over a half century of fishing the Catskill rivers, I have witnessed the degradation of many of our famous rivers, including the Beaverkill and the Willowemoc. Global warming, a lack of care in land use bordering the rivers and other factors have had serious adverse consequences. They have experienced diminished fly hatches, reduced flows and escalating water temps.

As a result, more and more the East and West Branches of the Delaware below the reservoirs have become the only "reliable" rivers to fish if one seeks "good" Fishing conditions. Your draft Plan recognizes this in terms of classification. BUT more and more they do not present "quality" fishing opportunities because of the crowds, especially the West Branch.
While wild fish are there and so are some good hatches, the boat traffic, both guided and personal and the numbers of wade anglers makes fishing there close to intolerable.

So what is urgently needed is some regulatory system which limits boat traffic both commercial and private. A substantial section of the West Branch in particular should be off limits to all boats and other water craft. Days of the week should be designated in which professionally guided boat fishing is banned. On the East Branch, a large section of the tailwater should be reserved for angling only with all watercraft banned. Consider the recent plan put forth by Montana's fish commission to limit the crowds and enhance the angling experience on the Madison River.

Also, stream improvement projects on the East Branch should be given high priority as much of that tail water is flat without structure and no doubt does not encourage greater fish health and procreation.

210) See comment #150

211) Thank You

212) See comment #150

213) Thanks for providing those of us in the angling community with, an opportunity to review and comment on the draft Fisheries Management Plan developed by the Bureau of Fisheries. From what I've observed, a great deal of time, effort and research went into the development of the document. Like all sweeping reforms of this magnitude, there is controversy over some of the recommended changes, so I have a few comments:

-Recommended no-kill, extended season trout fishing:

For a very long time, some of us have been proponents of extending the season, so anglers would have an opportunity to fish during the fall runs of brown trout and landlocked Atlantic Salmon, from the Pepacton, Cannonsville, Rondout and Neversink reservoirs, but only the main feeder streams. These reservoirs are all stocked, lightly fished, and with little harvest,

-Pros:

Allow non reservoir, stream fishermen a chance to hook a very large trout. The same opportunity those anglers have, that fish the Finger Lakes and Great Lakes spawning runs,

-Cons:

Several of us, and there is consensus, are concerned with anglers fishing the very small tributaries, that most of these lake run fish spawn in. We believe that there will be considerable opportunity for illegal harvest, along with the disturbance of redds by carless, wading fishermen. We would urge the Bureau of Fisheries restrict access to these small streams,

-Lack of two year old Brown Trout, East Branch, Delaware River:

Over the last several years, a number of anglers have reported the lack of, 10"-12" ie two year old brown trout, in the tail water section of the East Branch of the Delaware River. We don't know why this is, in that there are good populations of yearling brown trout, and a thriving population of 16"-20" fish too. Some of us wonder if the 1 fish, any size regulation, the Bureau is proposing for the East Branch, will sufficiently protect the two year old year class?

-Esopus Creek, stocked-extended:

Historically, the Esopus has been know for it's spring run of wild rainbows, ascending the river from the Ashokan Reservoir, to spawn. The Esopus is famous for that spring run. In addition, there is spawning by brown trout in the fall. To the best of my knowledge, the Esopus is classified AT(S). For years, while working as a biologist in Region 3, we attempted to discontinue stocking brown trout yearling in the Esopus, because of the excellent wild rainbow population. There was always push back by the Ulster County Federation of Sportsmen's Clubs, so the stocking continued. Based on surveys and historical angling data, the Esopus is NSA wild rainbow trout fishery, and should b managed accordingly. I believe stocking should be discontinued, the policy changed from "Stocked Extended" to one of the "Wild" categories.

Thank's for giving us a chance to comment on the this draft, trout stream management plan.

214) **In the initial Plan**

- Designate the UDR Tailwaters as "Wild-Premier" to Callicoon.
- Prioritize wild trout through integrated habitat restoration goals.
- Eliminate stocking in the Upper East Branch (Pepacton to the confluence with the Beaverkill).
- Reduce the trout harvest limit to one fish in total on the East Branch, West Branch, and Main Stem.
- Grandfather in existing catch and release stretches.
- Prioritize Oquaga Creek for an upgrade from "Stocked" to "Wild-Quality."
- Retain existing special regulations in the East Branch and West Branch that prohibit angling to protect spawning beds.
- Automatically default all tributaries of "Wild-Premier" reaches to "Wild-Quality," not "Wild."
- When fishing on "Wild," "Wild-Quality," or "Wild-Premier" reaches, anglers may only use single point hooks.

To Improve the Plan as it Impacts the UDR Tailwater Fishery

- Manage the UDR Tailwaters are a highly unique New York fishery.
- The Statewide Plan should include provisions for the refinement of management practices based on evidence and recommendations from Wild-Premier Trout Management Plans.
- NYSDEC Fisheries Bureau should be more assertive in their intra-agency communications and with the Decree Parties with regard to water releases to the UDR tailwaters with the protection of the wild trout fishery as the paramount management objective and concern.
- The NYSDEC Fisheries Bureau should explore creative ways to enhance enfocement through diverse partnerships with conservationr groups, anglers, landowners, and municipalities.

    - Further "DEC funded" projects

- Fund a study to evaluate impacts of anglers in spawning tributaries and the impacts on young of the year trout.
- Fund the installation of educational signage where Redds are found.
- The NYSDEC Fisheries Bureau should advocate for increased funding for improved enforcement in the NYSDEC budget.

215) I would like to emphasize one particular factor relating to the Plan and the Upper Delaware fishery. I am Ph.D. I fish biology and have fished the Delaware system for 45 years. During that time period I have seen significant negative changes in the quality of the fishery. The most obvious of these is the huge increase in fishing pressure and particularly the use of watercraft (drift boats, pontoon boats, kayaks and canoes) for the purpose of fishing. The problem is that fishing FROM a watercraft allows access to every location in a river or stream, and therefore there is no refuge space in which trout are immune from incessant pressure. I have seen this on all branches of the Delaware, including the Beaverkill. It occurs with both professional guides and recreational anglers. I am familiar with other world-class fisheries in the U.S. Canada and elsewhere. In many locations an angler must be wading and cannot cast from the watercraft. I understand that this may not be a popular regulation for many, however I believe it will help protect the fish and improve the overall quality of the fishing experience. Please consider some options which will limit fishing watercraft harassment of both fish and wading fishers. Thank you.

216) Please keep current fishing season as is as well as the current catch & release areas.

217) Thank you for your efforts to maintain and hopefully enhance the Delaware River fishery. My focus will be on the West Branch, where so much of my adult life has been spent. I have only one request, that you please stop the carnage that is the horrible practice that occurs at the lowhead dam above Rt 8 in Deposit.

On a daily basis, I watch dozens of fish dying as large lures with multiple treble hooks are thrown through the overflow. Five and six year fish which have survived the heat, the low water years, by instinct move upstream in search of the coldest water. By nature of their age and size they adapt a more carnivorous diet and thus succumb to these deadly portrayals of baitfish. The few that escape are scarred and suffer deep lacerations of the lip.

Watching these people engage in this disgusting version of sport should be appalling to anyone focusing on the viability of this trout population. These are the same fish essential to the annual spawn.

This past weekend I watched as a group would catch fish, rope some on a stringer, other place in a wet box, and hope to replace their catch with a bigger fish. It continued to happen, They drove away and then returned.

The catch and release section in Deposit has been so well received and successful by the latest fish surveys. Above the lowhead dam is No Fishing/ No Trespassing in consideration of the NYC water supply. To extend that Catch and Release initiative up to the lowhead dam would have a monumental positive and lasting impact on the population of spawning-age fish.

Finally, but just as devastating, is to watch the smaller fish, the 6" to 18" fish that are of no value to these guys, having treble hooks ripped from their mouth or gills and float by dead. Please consider eliminating this vial practice or at least make it less rewarding. Thank you, Andrew Stone

218) My comment on the coming trout stream management changes:

A month closed during brook trout spawning, as NY does for walleye spawning, is my recommendation. To keep anglers from wading through redds and to give wild brook trout a chance to spawn in peace.

I would like to add how glad I am to see NY State stepping up and making these changes.

219) The Federation of Dutchess County Fish and Game Clubs, Inc., appreciates the work done by the Bureau of Fisheries and the Focus Group to develop the updated Trout Stream Management Plan for the state. There was a clear need to move away from the CROTS based management policy; angler preferences have been shifting for many years. Many more anglers now practice catch and release and many of those who still creel trout, limit their catch. Management practices and policies should reflect the changes in attitude, while continuing to accommodate the average angler. While we understand that many anglers prefer to fish for wild trout, we caution the Bureau that while that may be a lofty goal, streams such as those in Dutchess County offer extremely limited opportunities for wild trout-based fisheries. Access, habitat, and other conditions severely limit the possibility of developing such fisheries. The daunting challenge will be educating and acclimating anglers to the new policies and regulations. Helping them to know how and where to access the information for each stream and reach, within a stream is going to be a challenge and will likely take longer than we anticipate. Providing clear, on-stream signage that clearly defines class of water, creel limits and boundaries will be extremely important. Maintaining that signage will likely be a challenge and will need to be monitored. Developing strains of trout that can tolerate the changing environment should be a priority, as will providing habitat that mitigates those same stresses. As noted in the plan, habitat protection will play an important role in the battle to maintain and protect the state's stream fisheries. Protecting the habitat in the backcountry of the Adirondack and Catskill Parks is less of a challenge because of the restrictions already in place within the Blue Lines. The Department must exercise its regulatory authority to protect our fisheries. Careful review of energy projects, SPEDES Permits, water withdrawal permits and reservoir release schedules and drawdowns, must be done so as to protect trout habitat. Lead Agency Declarations for the SEQRA process must be reviewed and validated to assure that local projects do not impact important trout habitat. The bigger challenge will be preserving our streams in those regions of the state where suburban sprawl, commercial development and encroachment are more the norm. The plan does provide trout management policies that are more in line with what today's anglers are looking for. But the plan will challenge the resources needed to fully implement it and monitor its progress. We believe that this plan should help the Department effectively manage our trout fisheries and better utilize our hatchery system. We also believe that the evaluation of the plan strategy and progress as presented is not as clearly defined as it should be. A more aggressive evaluation schedule should be developed. In closing, we feel the comment period was too short. We are an all- volunteer army and cannot be as responsive as larger organizations that have more resources at their disposal. The tight schedule probably discouraged many anglers from providing comments in spite of the outreach employed during the development of the plan.

220) The state FWMB would like to take this opportunity to thank Steven Hurst and the Bureau of Fisheries for recognizing the need for an updated Trout Stream Management Plan for the state. The current management plan is decades old, and was developed at a different time, under different conditions. Angler preferences in general have shifted through the years, and many of them do not measure their success and satisfaction based on the number of fish they put in their creel. Stream conditions, for various reasons, have changed and management objectives should address those changes. We do wish that the comment period was not as tight as it was, the comments regarding this plan would be far more beneficial and more telling if them came from the average trout angler. Larger organizations and not-for-profits can be more responsive, while individual stakeholders will likely be slower to respond. The tight schedule probably discouraged those singular commenters. Regarding the contents of the plan, it is bold and broad, if not dramatic. We think that recognizing that a stream may provide different kinds of opportunities from its headwaters to its mouth or confluence and a larger stream goes to the core of the plan. Managing into this new environment will likely be a challenge. One of the larger problems that we see will be educating the stakeholders; access to the new regulations, where those regulations apply, and helping them know how and where to access the information for each stream and reach within a stream is going to take time. We believe that it will be a longer process than we normally experience. The board believes that another challenge will be on-stream signage that clearly defines type of water, creel limits and boundaries. Maintaining that signage will very likely require more resources than currently necessary under the current management plan. It will also require close monitoring. While we understand that many anglers prefer to fish for wild trout, we cannot allow our plan to evolve to the point that we are trying to maintain “wild trout” fisheries in water limited by habitat and other conditions. The FWMB encourages the potential development of strains of trout that will be more tolerant of climatic conditions. Many of the problems our streams are experiencing today are the result of warming stream corridors resulting in warmer waters. As noted in the plan, habitat protection will play an important role in the battle to maintain the state’s trout habitat. Protecting the habitat in the backcountry of the Adirondack and Catskill Parks is less of an challenge because of the restrictions already in place within the Blue Line. The bigger challenge will be preserving our streams in those regions of the state where suburban sprawl and commercial development and encroachment are more the norm. The Department must exercise its regulatory authority to protect out fisheries. Careful review of energy projects, SPEDES Permits, water withdrawal permits and reservoir release schedules and drawdowns, so as to protect trout habitat. The Department should also exercise tighter control over the SEQRA process for projects under local control to the extent that Lead Agency Declarations must be carefully reviewed to make certain that trout habitat will be afforded proper protections. The plan does provide trout management policies more in line with what today’s anglers are looking for. But the plan is just grand enough to challenge the resources needed to fully implement it and monitor its progress. We believe that this plan should help the Department effectively manage our trout fisheries for this generation and beyond. But we also believe that the evaluation of the plan strategy and progress as stipulated is not as clearly defined as

it should be. We also believe that managing the plan under the resource restrictions that the Department typically suffers from makes it unlikely that it will be possible to respond timely to alterations to the plan as the need develops.

221) [See comment #276] I agree with FUDR especially the issue of opening the upper West Branch of the Delaware to angling all year. I have fished this river for 30 years and cane say that when that area was closed to fishing an increased number of young browns was notices. Prior to that I hardly ever caught a small fish.

222) I want to complement the DEC on its new plan and forward thinking regarding the New York State inland trout fisheries. The old mantra of fish per mile of shoreline and trout caught per man hour of fishing are nebulous at best and really don't define objectives of a trout program that is so vital and precious for the state and the entire nation for that matter.
I really like the idea that your emphasis has shifted from just stocking trout in inland streams to one of enhancement of wild trout fisheries, conservation and rehabilitation of streams, angling regulations, fish culture, public access and information and outreach.
I am excited that habitat enhancement and protection are one of your main objectives. Without great habitat and protecting the great fisheries we have there really would be no need to stock fish where they could not survive. Thus this goal should be of major importance to your mission.The rehabilitation of Oatka Creek in the Oatka Park section is just one fine example of the DEC/public participation that needs to be expanded by DEC. You need to reach out to all conservation and environmental groups to accomplish your new mission. In addition, you need to conduct more surveys of fishermen for their input on the status of inland trout streams. Not just "how many fish?" but questions of wild versus stocked are key. Landowners, especially farmers need to be helped and instructed on pollution issues of the farmland-stream interface. Help here is a must in preserving our fisheries. Additionally you need to seek the aid of the Federal Fish and Wildlife and the EPA in assaying our streams. A few years back the EPA installed monitoring devices in Oatka Creek and Spring Creek for monitoring purposes but no one in the DEC Avon office could tell me about these installations nor the results of the study. Are you aware of the EPA involvement in Oatka and Spring creek? These monitoring stations are now eyesores standing in the streams. The more data you collect , the better decisions you will make. Investment in monitoring stream aquatic health is another important parameter that needs to be addressed. This could include the help of Trout Unlimited clubs and watershed committees like the Oatka Creek conservation organization.
Classification of streams into five categories is a great start on addressing and managing the trout fishery. Additional input from people who fish the streams would help you assay the distribution of wild fish.Keep up your assay work relentlessly since this will aid in honing great management of the fishery. For example , Oatka Creek has wild or "native " brown trout from Circular Hill road down stream to Scottsville and not just in the Oatka Park section.

Changing the regulations to make them simple is a great idea but simple does not equate to compliance. The DEC needs to enforce the regulations stringently.Staffing is a problem and the enforcing officers do a great job but maybe some advertising and literature and larger fines would have a beneficial impact.
Public access is always a major issue of prime importance. Continue to gain public access sites but also you need to cultivate land owners who allow fishing on their properties.
Please reach out to the fishing public for help in realizing your mission. I was fortunate to hear Steve Hurst, NYSDEC bureau chief, bureau of fisheries talk at the NYS TU meeting

just held. His message was great.Together we can make the New York State trout fishery the very best in the United States.

223) There should be a map showing where these high quality streams can be found, for the various species.
Where is the treatment of streams with wild rainbow trout? They deserve some space and recognition as a valued component.
Your choices of photos is poor with no graphics of the objects you are addressing (fish and fishing) and only a picture of a bunch of old men and a few women.
The table that occupies most pages of the report lists about 250 streams with information that is rigidly specific to where stocking is intended. There should be a column showing the primary trout species being managed-for in each stream.

Objectives are developed around metrics that require extensive funds, advanced procedures and sufficient staffing levels. These resources are in short supply and metrics should be developed that are realistic to the modern realities. Fish population estimates were not necessary for wise stocking practices 50 years ago and the management being proposed can be adequately served with relative abundance estimates, at least some of the time.
A sentence or two about how trout are a valued component of the larger fish communities of these streams, and management of these other species is also a priority for the agency.
Trout stocking in streams 30 years ago was well served with yearlings averaging 9" and the plan you have for delivering some fraction of the stocked fish to be over 12" for each stream is a waste of resources. The larger fish are too expensive to produce and deliver and a 9" average size of stocked trout offers sufficiently high quality fishing.

The objectives said something about outreach programming but I didn't notice it getting any treatment after that.

When people take the time to comment on DEC management plans or intentions to upgrade rules or classifications, they make a major commitment to trying to help. It is very discouraging that the process does not include a mailing back to the contributors that it was received or how one might be notified when the revisions are completed. Please try to make government look like they/you are somewhat grateful for this participation.

224) Thank you for the opportunity to comment on the proposed trout stream plan. It is heartening to see this work being undertaken and I am particularly happy to see an emphasis being placed on wild trout and brook trout specifically.

My only potentially critical comment would be to consider simplifying the daily limits — or ensuring that all access points for a particular reach are well marked to indicate the reach's category/daily limits. If there is any point where a stream's designation switches, those points should be equally well marked.

225) As a member of Trout Unlimited, I wanted to thank you for the hard work and effort on the Draft Fisheries Management Plan for Inland Trout Streams. ONE major concern…

Concern over a year-round catch and release season is being echoed in several watersheds in the Catskills, from Willowemoc Creek to the East and West Branch Delaware River and elsewhere in watersheds throughout New York… Local anglers and conservationist are concerned about the unintended impacts on wild trout population recovery if spawning is interrupted or redds are destroyed.

226) I read the plan and found it very comprehensive. I support the recommendations included in the document. Thanks for this thorough and far-reaching analysis. I especially appreciated the data about trout streams and rivers across the state.

227) See comment #150

228) I write to share my comments on DEC's proposed Trout Stream Management Plan. I am also a lifetime angler, and someone who fishes Esopus Creek thirty to forty days a year. I am also the Vice President and Advocacy Chair of the Catskill Mountains Chapter of Trout Unlimited, however these are my personal comments.

I applaud DEC for crafting a plan that recognizes the value of wild fisheries and emphasizes the importance of habitat management. This is a significant improvement over the old CROTS system. I am personally excited about the prospect of the extended catch-and-release season. While this has been controversial within the fly fishing community, I think that if you took a secret poll, most anglers would be in favor of it. Given the experiences of other states, I'm just not all that concerned that an extended season will have a deleterious effect on trout populations.

My major concern with the plan is that, despite its valuation of wild trout, it essentially abandons wild trout populations in Stocked-Extended streams, and that's particularly the case with Esopus Creek. I recognize that your limited resources means that you'll need to focus on improving Wild Quality streams first before Stocked-Extended streams, but I would like to see efforts made to identify those Stocked-Extended streams that could develop into Wild Quality streams.

Finally, I am distressed by the plan to dramatically increase stocking in Esopus Creek, making it the most heavily stocked stream in New York State. This stream has a historic population of rainbow trout, in addition to a healthy population of wild browns. I recognize that stocking does draw many people to the stream, and that stocking plays an important role in welcoming new anglers to the sport of fly fishing, but the proposed increase of stocking in Esopus Creek could only increase stress on wild fish in the stream and decrease the experience of fishing the Esopus. I would like to see at least a portion of Esopus Creek designated as Wild Quality. I am concerned that your decisions about Esopus Creek are based on Robert Angyal's 2017 report, which surveyed fish populations in Esopus Creek during years when it was hit by several major floods.

Overall this is an excellent plan, but I strongly urge DEC to take concrete steps to enhance the wild trout fishery in Esopus Creek.

229) See comment #150

230) See comment #150

231) I am writing in support of the draft DEC trout management plan.
I am an active fisherman and conservationist. I am a member of Trout Unlimited and Fly Fishers International.
I support actions that help protect the health of streams and the recreation they in turn support. In believe the new plan will help protect wild trout, and extends management of the systems that support them. This is good for the whole system and all the people who enjoy these streams.

232) As a board member of the Ashokan Pepacton Watershed chapter of TU we are quite concerned about the designation of our precious **Esopus Creek**. We think it is an exemplary example of a "**Wild Quality"** stream rather than **the Socked Extended** designation it has been given.

Please find attached the RESPONSE prepared by our President Mark Loete. We believe it clearly indicates our reasons for seeing the Esopus designation as a "**Wild Quality**"stream.

233) Thank you for a proposed change to NY trout stream management that has been way overdue. You are all to be commended for your effort and hard work. Most of the changes are very positive, especially the reduced creel limit in wild trout streams and the grandfathering of catch and release stream sections.

There are other small changes that can be made, like eliminating treble hooks on wild trout water, especially since with a one fish limit these fisheries are in reality mostly catch and release. The added mortality of treble hooks seems to be counter productive toward that goal. All the hook mortality studies that have been done show that treble hooks significantly increase mortality on released fish.

One other small change that should be considered, and one that can have a large impact on recruitment of wild fish is the one size fits all approach on not having season closures to protect spawning trout and redds. Higher pressured fisheries like the Upper Delaware would stand to seriously lose fish populations due to unsuccessful spawning of targeted spawning trout and redds that get walked on. Understanding this isn't hard to comprehend. Marine fisheries that were brought to dangerously low population levels have recovered due in a large part by closing the season during spawning periods. I would hope that DEC would continue to preserve season closures in inland fisheries and not try to become reactive after the fishery is degraded. That's a tail you'll keep chasing for a very long time.

234) I am commenting on the Upper East and West branches of the Delaware River. In my opinion, these wild trout streams should be entirely catch and release. It is my belief that the models and surveys you utilize to determine fish take and mortality on these systems are extremely inaccurate for a couple of reasons. First, even if all fisherman practiced catch and release exclusively, you would have a significant mortality rate due to incredible fishing pressure and the resulting handling of fish. Many of these fish are caught and released on a daily basis. You must take into account that this is far from a recreational fishery. It is highly commercial and receives incredible pressure from guide services and their clients. Secondly, and probably more importantly, there is a high level of regulation abuse on these systems due to a dearth of law enforcement. I have witnessed, and heard about regularly, bait and spin fishermen (and even occasionally fly fishermen) walking away from the stream with illegal stringers full of large wild trout. It is painful to consider the compounding effect this has on these systems day after day for months on end. I would urge you to consider the fact that the Upper Delaware system is a rarity these days and it is incumbent upon you to preserve it in any way possible. I have regularly fished here for many years and I can say with certainty that it has declined significantly in the last two years. It is unreasonable to believe that this fishery can sustain its quality of wild trout fishing unless changes are made.

235) The Home-Waters Chapter of Trout Unlimited (TU) represents Rensselaer County. Our members are a diverse group of fisherman and sportsman. Early on, we engaged in the process of developing the recently released draft of New York State

Department of Environmental Conservation's (NYS DEC) Trout Management Plan (the Plan). Home-Waters TU and the NY State Council of TU are in agreement that the Plan reflects a new approach to trout management. We concur that the Plan is appropriate and reflects the thoughtfulness and scientific rigor of DEC staff.

The mission of Trout Unlimited is to conserve, protect, and restore North America's coldwater fisheries and their watersheds. The long-term goal implicit in our mission statement is achieving self-sustainability of salmonid populations. Home-Waters TU supports the guiding principles of the Plan to strive for self-sustaining populations of wild and native trout through habitat restoration and refining stocking practices while providing a diversity of fishing opportunities across the state. Please note that TU's strategy in providing feedback on the Plan is indicative of our organization's national, state, and local structure. National and state responses focus on broad commentary, while local chapter level responses focus on watershed specific concerns. Therefore Home-Waters TU is supporting the NY State Council's thoughtful comments on the Plan, and offers the following additional comments from our members as detailed below. Like other Chapters and the State Council, our feedback on the Plan is designed to be constructive, with the desired goal of supporting or recommending additional strategies or considerations that will not overwhelm its implementation.

- The Plan should not limit stream classifications to individual reaches, but should approach management on a watershed level or a stream complex level.
- Protection for streams should consider classifications for headwater and tributaries within a "stream complex". For example, the Poesten Kill mainstem, headwaters and tributaries can be considered a stream complex, with complimentary management of the Quacken Kill. The complex should receive classifications for stocking, and wild fish that consider the habitat and stream conditions along the entire stream complex. Consistent and sensible classifications will simplify the management decisions.
- Identifying and protecting spawning areas and potential spawning habitat in streams to promote robust repopulation and resiliency of wild fish. Consideration of a pilot project for egg stocking to determine if spawning, nursery and growth habitats can be maximized.
- Clear designations for stocked, stocked extended, and wild classifications that avoid complex arrangements such as stocked reaches dividing wild reaches.
- A clear strategy for improving streams through assessment and restoration, with a goal to upgrade streams based on habitat suitable for wild fish reproduction. NYS DEC should strive to promote additional wild Quality streams, with Catch and Release protections.
- Developing an evaluation plan to assess the effectiveness of management actions.
- Home-Waters TU is eager to reduce hurdles to progress, and assist NYS DEC with all of the above actions.
- Consider tackle restrictions for Catch and Release sections, including the restriction of barbed hooks, weighted hooks and treble hooks.

Members expressed satisfaction with Stocked Extended methods for extending the availability of stocked trout. Members also expressed an interest in fall stocking to improve late season and winter fishing in suitable reaches.

Satisfaction was also expressed for the idea of improved PFR mapping. Members thought that a listing such as Appendix 1should be maintained as well, but with better reach descriptions using plain English wording. This would be a substantial improvement in available data, which could also include links to recent fish survey data.

Home-Waters would like to congratulate NYS DEC for undertaking the process of develop the Plan, including the extensive outreach to anglers. The result is a workable draft Plan with much to like.

236) Thank you for the opportunity to comment on the Draft Fisheries Management Plan for Inland Trout Streams in New York State. First of all may I commend the thorough and detailed information that has gone into the preparation of this draft plan and the much warranted emphasis on protecting wild trout populations. I especially wish to comment on the importance of exceptional trout fisheries designated as Wild-Premier trout fisheries, particularly the Upper Delaware Trout Tailwater Fishery.

The UDR tailwater fishery is unique in that it was created by the construction of the Cannonsville and Pepacton Reservoirs in a watershed that holds a population of wild rainbow trout that has been acclimated to the Delaware River watershed by more than 100-year residence in that region of New York State. What makes this wild-premier fishery so valuable and challenging is that it consists of three robust self-sustaining populations of salmonids, two that spawn in the fall and one that spawns in the spring. It is a world-renowned fishery that needs and deserves unique management.

The current tail-water fishery is particularly challenging in that recruitment of the spring-spawning rainbow trout population comes primarily from the small tributaries to the UDR as does the native brook trout population, whereas recruitment for the brown trout population arguably comes primarily from spawning in the larger waters of the East Branch, West Branch and mainstem of the River. To complicate matters even more, diverse releases from both Cannonsville and Pepacton strongly affect recruitment, growth rates, population densities and distribution of all three species throughout the fishery. If flows are too high in the fall when the brown trout are spawning, their redds may be uncovered during the incubation period in the winter. If flows are too low during the spring foraging season of April, May and June and again in the fall as water temperatures drop to optimum temperature for growth the number and size distribution of the fishery are strongly affected.

Yes, the UDR trout fishery, extending all the way from Cannonsville and Pepacton to Callicoon is unique and requires very special management. I strongly suggest that DEC consider a closed season in the principal rainbow spawning tributaries during the spring spawning season to protect the large, highly vulnerable. rainbow trout that ascend these tributaries in the spring of the year. Further, I recommend that all effort be made to determining the ultimate limiting factors that determine the number and size distribution of the three widely differing populations that exists together in this remarkable trout fishery. Yes, size limits, creel limits and hooking mortality all play a part, but so do releases from the reservoirs.

237) All streams should be closed to any fishing while wild trout are spawning.

238) See comment#150

239) Please manage our NY fisheries for WILD and NATIVE Fish! Less stocking please. Year round fishing is a terrible idea. Give the fish a break.

Delaware, Greene, Sullivan and Ulster counties have wild land that is designated as state forest, forest preserve, wilderness area, and multi use recreation area, we ask NY DEC to practice responsible recreation and protect our Catskill rivers.

Keep current Catch and Release areas open all year round and keep current fishing season April 1-October 15. Protect our Catskill rivers.

240) I wanted to share a couple of opinions on the draft trout stream plan:

1. I believe Trout should not be stocked wherever there are already existing populations of wild Trout. When wild Trout are present, they should be allowed to reach their full population potential without the presence of stocked Trout, which provide additional competition and can muddle the gene pool of wild trout.
2. If it is decided that the state will continue to stock Trout over populations of wild Trout, then the state should stock a different species of Trout that will not interbreed with the wild Trout. For example, in the Upper East Branch of the Delaware River, Brown Trout are stocked over a strong population of wild Brown Trout. For anglers looking to catch wild Brown Trout, this ruins the experience, and I cannot imagine it helps the population of wild Browns. The state could instead stock Rainbow Trout, of which there are not many in the Upper East Branch of the Delaware River (although they are present).
3. Wild Trout should be protected during their spawning season. During the typically low water of fall when Brown and Brook Trout spawn, anglers should not be allowed to target spawning fish. I do support an extended season, but not when it puts wild Trout at peril. The season for wild Brown and Brook trout streams should be closed in the fall in early winter when Brown and Brook trout are spawning. This timing will vary depending on geography, but from my experience it occurs in October through December. Stocked trout streams during the spawning season with additional stockings in the fall to present anglers with the opportunity to catch Trout in the fall and not harm wild Trout.

Thank you,

241) Reading through the draft, it is a lot of information to take in and process. It seems like good ideas for the environment, resource and enjoyment of anglers. I grew up in Dutchess county where I have fished before. I moved away for years and have recently moved back to NYS from Colorado. First I would like to say that if there is a volunteer committee that is present to talk and discuss and to be able to be a resource to the state, I would like to know how I can be involved.
I want to briefly identify and share my thoughts on what I have experienced fishing since I have been back. I believe due to the Covid-19 pandemic this may not be the norm, but what I have experienced. There were a fair amount of people out trout fishing during the times I was out. I had talked to many people and we all agreed that the stock amounts must have been reduced or not at all. The lack of fish was a bit scary. So if fish were stocked this year,then a lot either died or were over harvested. I spoke to several people that said when fish are stocked people wait until the truck leaves and they go in and scoop out bucket fulls. There just aren't enough conservation officers to enforce every body of water. I believe the

responsible anglers should have a better resource to report such offenses. We could use technology to take photos and take info down and report immediately.

I believe smaller daily limits are a good idea, with size limitations, as well as more catch and release areas even in the stocked streams. I have caught some really big hold overs and released them back. I also believe in streams to protect our waters, ecosystem and resource the restriction to artificial lures only would be a great idea. I am not sure how to implement this but restrictions on fishing trout waters above 70F to reduce the stress on the fish.

I believe the best and most important resource to helping the survival of trout is through education. Just as the hunter safety course required by the state in order to hunt legally, it should be required to take a fishing course. This course should go over species, identification, proper handling, safety and etc. If people just fish how are they going to identify a wild trout from a stocked trout. The reason I bring this up is my encounters with inexperienced anglers. We could help stop the spread of invasive species by having people wash their waders or boots, possibly provided wash stations. Inform them about proper fish handling. Explain to them the cost of stocking and creating and protecting this valuable resource, everyone listens when it hits their pocket. Explain to them the importance of stewardship. What the effects are when leaving behind fishing line and other garbage. Everytime I go out I try to fill a trash bag of trash left behind. Most of this is not left by anglers though.

The other thing I have noticed is what I had just mentioned. People swimming and partying around the PFR sites. Afterwards leaving tons of trash of alcohol containers, cigarette butts, and paper trash. I have even been picking baby diapers up. There again should be a better way of reporting this and steep fines. I don't believe that the land owners that gave rights to the state and now anglers intended to have this happen. It only hurts future locations from being obtained. Landowners, neighbors and anglers should be able to report this.

Thank you for your time and listening to my thoughts. If you have any questions please contact me. I would love to be more involved with whatever I could. Maybe even teaching classes. I just want to be able to enjoy our waters with everyone while protecting our natural resources.

242) I like all the proposed changes to this plan besides making a statewide catch and release season season. Fishing pressure goes up and consequently the quality or size of the fish goes down. People will over harvest the trout and thus it goes against everything we are trying to achieve. Its hard for officers to enforce snagging on Lake tribs now how are they going to enforce this?

243) I have read the new regulations placed on Catskill Rivers in Delaware, Greene, Sullivan. and Ulster counties. Such standards are critically concerning. The protections and regulated seasons that have currently been in place keep conservation efforts and fantastic seasons on these waters alive. These efforts help to regulate the waters that anglers all over the world only dream of stepping foot in. Disrupting these regulations and conservation efforts to include year round fishing on Catskill rivers will ultimately kill what

passionate fly anglers like myself, conservation groups, and the DEC itself have tirelessly protected for decades. If such regulations go into effect, substantially detrimental effects could take place, with precious systems that we have come to admire and enjoy, and hope to see our future enjoy, become lost. I highly urge the DEC to reconsider such regulations, to keep trout angling on all rivers in Delaware, Greene, Sullivan, and Ulster counties to the April 1- October 16th season, so native life in these waters may remain, and we may continue to enjoy some of this great country's finest trout angling. Thank You

244) Please don't keep the rivers open between October and April! We need to preserve the wild trout species that are so beautiful here. Please think about what you're doing. Thank you!

245) I want to add my objection to DEC's proposed classification of the Esopus Creek as a Stocked-Extended stream. I have fished the Esopus for nearly 50 years with a friend of mine and someone who I am sure you are very familiar with - Edward Ostapcuk. The first time I fished the Esopus was probably the year Ed moved up to the Kingston and to this day routinely make several trips a year to the Esopus to fish with Ed. I'm sure you would agree Ed knows the Esopus probably better than anyone presently alive. He believes the Esopus between its source at Winnisook Lake downstream to Lost Clove should be classified as Wild and likewise the area between the Shandaken Tunnel and Ashokan Reservoir should be Wild-Quality. I agree and would ask that you reconsider the DEC's present management proposal.

246) I would like to take this opportunity to thank the NYS DEC Bureau of Fisheries for taking the time to update the Trout Stream Management Plan (Plan) for the New York State. Today's management plan is some 50 years old, and was developed when water quality was much different and angler satisfaction was based on catch rate per hour. Very often tributaries were stocked in early spring with "put and take trout" as there was little chance for summer hold-over. Water quality on many streams have greatly improved over the past fifty years and a modern trout-stream management should address those changes.

An item in the Plan that may need some tweaking for implementation is the education of anglers regarding the new regulations. It will be especially important for anglers to know where new regulations apply, and how to find the information for each tributary on a stream. Perhaps some on-stream signage that defines the tributary, including creel limits and mapped boundaries can be utilized. It might also be useful for signage to be available in Fishing Access Areas owned or managed by DEC as well as PFR parking areas.

Also along the lines of angler education, one item in the Plan that does give me cause for concern is year round fishing on tributaries that have been previously closed in the early fall. As a trapper, I can see the possibility of future user conflict when none had existed in the past. Newly opened tributaries for year round tout fishing will likely put anglers and trapper pursuing mink, otter and beaver in the same locals. Anglers may not be aware that trapping takes place in the fall and the Plan should address this situation. Anglers should be aware that trapping is a necessary and legal activity which takes place along the same tributaries anglers may be using for the first time outside of the summer months. Anglers should be made aware of possibility of traps being set and that it is unlawful to tamper with a legally set trap.

247) Please consider special regulations
on the Catskill rivers located in Delaware, Greene, Sullivan and Ulster counties.

As residents and anglers,
we ask you to consider keeping fishing season closed during October 15-April 1 and to keep the current catch and release areas open year round. Trout are special. The waters they reside in are special. The lands where the waters flow throughout are special.

This simple regulation will
protect the wilderness and angling heritage that the Catskills is known for. Our wild lands and waters deserve special protection to continue the preservation of our reputation and resources. Our trout deserve time to spawn in quietude, away from the threat of anglers. Our waters deserve a rest to regenerate for the next season to come.

Keep trout season what it
is- a special season to look forward to. A special time when Spring awakens the angler, local, and tourist to shake off the winter and rekindle their passion. Help local businesses gear up for the economic boom that happens from trout season.

Keep the tradition of the season
opener alive!

The Catskills have wild land that is designated as state forest, forest preserve, wilderness area, and multi use recreation area. We ask NY DEC to practice responsible recreation and protect our Catskill rivers.

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The thought of having fishing open year long, the Catskills will not be able to handle a wild trout population with it bordering Pennsylvania, New York City, and New Jersey. There's plenty of people that fish these rivers we cherish in the Catskills as is, if it were open year long it would crush and destroy the wild trout population in that region. All rivers would become the famed "Beaverkill" which is basically a hatchery fishery. If people want easy fishing, go to the Beaverkill. With the amount of stocking it receives and all the clubs up above on the upper regions it has absolutely ruined that river for majority of wild trout. I go to the Catskills to find wild trout on a daily basis sometimes 5-6 days a week. I've fished these rivers in excess of over 80 hours sometimes during a weeks time. The thought of making it open all year will only make the entire Catskills become a hatchery haven like the Beaverkill. Keep the regulations the way they are. If any change were to be made, it should be made to be a harsher change for the trout to strive and make the Catskills what it really was back in the early days. If you are knowledgable look back in the early 1900's of what the Catskills could sustain. Fish were being caught much larger than now a days on a daily basis. The Catskills has diminished from what it already once was with Brook trout diminishing all over from the brown trout taking over. Now you want to consider fishing all year long? The Catskills will never be what it once was if this change were to be made. If the restrictions were harsher there is a possibility to really see how well the trout strive in the Catskills and be what it is. I urge you to please do not make any changes to the regulations as they are. ITS THE BEST FISHERY ON THE EAST COAST THE WAY IT IS. DO NOT CHANGE IT. And has potential to be even better like I stated before in the older day's. Wild trout need time to do their thing and not be harassed by people. Please please give this the most consideration. I look forward to hearing your response. Thank you

249) See comment #247

250) See comment #247

251) See comment #150

252) I'm 81 years young and have had the good fortune of being able to fish for trout in many areas of the state. Joy has come from fishing alone for brookies, after a long hike, to small streams deep in the woods of the Adirondack Park to the other extreme and excitement generated by introducing/teaching young family members and friends how to fish the stocked trout streams of Southeastern NY.
Therefore, I'm pleased that you're updating the full management plan for our wonderful trout fishing resources.
While I see much good work with excellent intention to present the best possible Trout Stream Management Plan based on available data, the measurement of results (after the plan is implemented) is very critical and a concern to me. The DEC must be staffed/prepared for very timely reach resurveys and then take aggressive action to remedy newly discovered issues not resolved by this new plan or caused by it.

I'm only providing input on one local stream in Dutchess County = the Wappingers Creek as I now fish it more than all others and the one I've assisted in stocking for decades. It is the first trout stream where I take all my children, grandchildren and now great grandchildren to learn how to 'dunk a worm'.
I suggest examining the possibilities of how to better stock the Wappingers Creek - not just sluiced off bridges or by volunteers carrying 5 gallon buckets to the stream but to scatter the available trout in pails in boats/canoes or floating release boxes or other means along reaches or 'sections' not posted and open by willing landowners. This would reduce the crowding near the usual 'fish dumping' sites and provide older fishers and their still learning family members a more enjoyable/better/real outdoor experience. This would also require

signage and other educational communication so the fishers are aware that the fish are spread out all along that reach.

Secondly, I'm not aware that the plan would continue the long-standing tradition of allowing the harvesting trout all year along the Wappingers Creek reach between the Pleasant Valley dam downstream to Red Oaks Mill. I see that special regulation as another opportunity to encourage/teach the young fishers during school holidays or any other day or hour presented when they ask Grandpa/Grandma to take them fishing. Please retain it in the updated plan.

Since I don't see a 'key' to the "Reach Descriptions", I'm would unable (if I chose) to provide more specific comments on other local and many other streams throughout the state I've fished in years past.
For example, on page 39 of Appendix 2, how do I locate reach T30 - T33 on Wappingers Creek? A broader description such as provided for other reaches or GPA points would be helpful to us neophytes without the need for a specific location 'key'.

253) I would like to express my strong support for the 'Draft Fisheries Management Plan for Inland Trout Streams'. Differentiating between wild and stocked fish while focusing on habitat improvement are critical improvements that represent fisheries best practices and align with the way I value my time on the water. I have traveled long distances to fish for wild trout and value the experience of those locations and fish quite differently than stocked fish. Having read through your draft proposal I would like to thank you and all participants for the hard work, transparency, and open-mindedness required to make such a change.

I have fished in the upstate area since I was a child, going on about 40 years, and strongly support these encouraging changes for future anglers to also find joy in healthy places with wild trout.

254) The scope of the draft Trout Stream Management Plan is far reaching, impacting much of New York State, and addresses both wild trout and stocked trout. The New York State Conservation Council canvassed its membership, both as committees and individuals, in order to accurately capture opinions.

The NYSCC Fish Committee captures the overall sentiment, considering this plan to be excellent overall and strongly recommending support. The Committee concurs with Trout Unlimited which says the strategy is probably one of the best trout management plans in the United States. In supporting the proposal Joe Fischer, Chair of the NYSCC Fish Committee, says that the NYSDEC should be lauded for its time and effort in addressing this long-awaited trout management plan.

Other comments acknowledge that New York State DEC has a strong hatchery system – one of the best in the nation -- that serves the stocked trout system well. We see no negative impact from this plan on the hatchery system and how it serves the sporting community. At the same time the document recognizes the great value of wild trout streams. The need to manage both wild trout and stocked trout stream resources separately is well defined.

A degree of comfort to the NYSCC membership was found in the statement that publicly accessible trout streams not shown in the plan are managed under the Wild category. Protecting, and where possible restoring, wild trout stream resources is seen as vitally

important. This is not to say that a stocked stream does not offer its own high value importance. Both stocked and wild trout streams need to be managed for their ecological worth as well as recreational opportunities. New York State is fortunate in having the environmental resources and knowledgeable, experienced people to serve both the wild and stocked stream assets that we possess.

Catch limits and catch-and-release are other issues. Some feel that if a stream has a specific desired catch limit, once a fisherman obtains his legal limit, further fishing should be discouraged. Continued fishing, especially during the hot summer months when the fish are already stressed, could lead to an overall kill rate well above the desired level.

Use of barbless hooks and types of live bait were not addressed in the plan; but those topics merit further discussion, especially concerning wild trout streams.

Catching inland stream trout is an enjoyable experience. Fishing for wild trout in our streams offers a higher level of enjoyment along with greater appreciation for our wild trout and the resources supporting them.

It is understood that streams on private land still have management restrictions on stocking similar to those being promoted in this management plan.

Additional input from NYSCC individual members and organizations supports publishing information about stream opportunities and including maps so that public fishing rights locations can be readily identified and accessed. Educating the public by identifying wild fish reaches in a publication as well as by stream signage could encourage angler knowledge about fish management, environmental protection and fishing ethics.

Thoughts for the Upper Delaware system suggest that the trout per mile goal should be higher and catch-and-release should only be open from November 15 to April 1. Creel limits on the main spawning tributaries should be reduced or protected during spawning periods.

This document clearly captures and identifies the elements of habitat, ecological challenges, protection of our natural resources, and recreational opportunity offered by our inland streams when it comes to wild trout as well as the value of a sound stocked trout program. In this plan wild trout and the natural resources that support them are treated separately from stocked trout.

This draft clearly addresses the different resources and opportunities that exist throughout our state. While the document deals with publicly accessible fishing streams, it is gratifying to know that non accessible trout streams are subject to similar sound management principles.

255) I would like to thank Bureau of Fisheries staff for this extremely well written, documented, and reasoned draft trout management plan. The plan defines a welcomed new approach to improve trout fishing in NY, by strategically focusing limited public resources to maximize ecological and recreational potential in the management of our

trout streams. I totally support the emphasis on habitat to increase trout populations. To promote this approach, I suggest that liaisons and partnerships be formed between DEC staff and groups such as Trout Unlimited, to develop priorities and actions that leverage DEC's resources.

Trout Unlimited has volunteers that are ready, or can be trained, to assist with tasks that meet the Plan's goals. TU fundraising efforts provide resources for equipment and habitat funding. For example, our Clearwater TU Chapter currently has temperature monitoring loggers in 5 trout streams and their tributaries, a total of 24 loggers. Volunteers have participated in numerous habitat projects that included obtaining funding. These include the Batten Kill, Geyser Creek, East Branch Delaware River, and Russell Brook (Beaverkill trib). Volunteers have also participated in obtaining PFR on Onesquethaw and Schenevus Creeks. And there is professional expertise available at the national level of TU.

With improved communication, and guidance from DEC, these activities could be expanded to meet TMP goals.

For particular habitat opportunities, work groups could be formed with DEC staff to collaborate on specific initiatives, collect data, help in electrofishing surveys, perform redd counts, plant vegetation, identify streams for potential upgrades and projects, expand learning and expertise to volunteers, use resources provided by TU National, seek funding, and develop strategies. This would involve developing a process for communication and identifying initiatives. We would like to engage members in educational programs that increase knowledge in ways that are valuable to the TMP goals. TU volunteers, with DEC guidance, could also work on community information sharing and outreach. Some of this could utilize the expertise available at higher TU levels.

Access is critical to recreational use by the general public. It should be pursued at every opportunity. TU members could voluntarily help, with guidance from DEC, in landowner contact and trust, building kiosks, locating "fishing permitted" signs, and enhancement of PFR compensation (cash). One of the four purposes of the NYS Counsel Fisheries Enhancement Fund is funding PFR acquisition.

DEC should increase its capacity to process PFR opportunities efficiently and quickly. Rather than have regional biologists painfully perform the necessary groundwork, consider a central office team dedicated to those tasks. Landowner contact and title searches require a different skill set than those of a fisheries biologist. The goal is to quickly process PFR offers from willing landowners before they are lost.

The compensation for PFR purchases should be significantly increased to more realistic amounts.

Finally, I have seen the unintended damage that barbed and treble hooks cause. Especially in the Wild categories, I suggest that fishing be restricted to single barbless hooks to reduce fish mortality. Communication procedures should be set up for willing anglers to record and report damaging habitat activity, such as riparian vegetation clearing, pollution input, and stream bank modification; as well as harvest and other violations.

State and National TU have expressed concern about lack of attention to watershed evaluation and connectivity, and the importance of protection for tributaries and headwaters. I believe communication lines should be established now to consider these issues, and how to incorporate them into the TMP in the near future. There also is concern with year round fishing and its potential detrimental impact on spawning trout. Redds might not only be damaged by wading anglers, but some sites might be targeted by unethical anglers. Spawning redds could be targeted by floating anglers in

the WB Delaware, for example. Year round fishing should only be allowed in stream reaches where there is evidence that no trout spawning is taking place.

Thank you for the opportunity to be part of this new exciting direction for managing our state's trout streams.

256) Please accept my sincere gratitude for all of your hard work in preparing the" Draft Fisheries Management Plan for Inland Trout Streams in New York State" of May 2020. Further accept my appreciation as a scientist and avid fisherman to contribute my comments to your plan.

I've been a New York resident trout fisherman for more than 50 years, and as of recently have

been privileged to enjoy the fruits of your labor >150 days/year.

Much of the content of your plan directly reflects the wishes of myself and the overwhelming majority of my colleagues. Please consider the following comments as indications of support, and areas for enhancement as you proceed to transition this draft plan to policy:

I. Support:

A. Philosophy. The stated philosophy 'Trout stream reaches will be managed based on a combination of their ecological and recreational potential with a clear distinction between wild trout and stocked trout management...n, is brilliant and captures the essence of what is required to effectively manage our resource for the foreseeable future.

B. Management Categories. The recognition of the need, and commitment to manage the diverse stream reaches within NY according to five different categories is commendable. Ido have one additional recommendation detailed below.

C. Category Harvest Regulations. I agree and substantially the proposed harvest limits across the five proposed management categories. The scientific and recreational rationales here are well balanced.

D. Seasonal Framework. Isupport the proposed statewide catch and release season of Oct. 16 through March 31 in all five management categories. Existing regulations allowing catch and kill (eg. Butternut Creek in Region 7) have

resulted in undue pressure on individual stream reaches. Ido have concerns for

impacts on spawning fish, and include commentary in the recommendations section, but trust that the Fisheries departments commitment to monitoring this impact and adjustments as warranted will adequately preserve our fisheries.

E. Stocking Strategies. The size objectives, and overall stocking strategies within the five management categories are substantially supported.

F. Commitment to Habitat Enhancement and Protection. Habitat enhancement and protection is essential to a sustainable future.

II. Areas for Enhancement:

A. Catch and Release Considerations. As Iam certain that you are aware, there is substantial concern for the impact of the "off season" catch and release consideration on spawning trout within the angling community. I support the proposed catch and release season, with the caveat of scientifically based regulations. To date your rationale has been largely defended by the anecdotally minimal impact on the fisheries in the border waters with Pennsylvania. Iwould recommend that you look instead to your success in the tributaries of Lake Champlain, specifically within the fall landlocked salmon fisheries recovery of the Boquet and Saranac Rivers. These fisheries receive considerable pressure during the spawning season, yet appear to have ample protections for the overall success of wild fish reproduction. I**propose that you should extend the regulations that you already have in place for those rivers, for eg. "unweighted hooks, and no added weight to the line" to the statewide**
Catch and release season.

B. Stocked Premjer Management Category. I**propose that the NY trout management plan should recognize the need for an additional management category, "Stocked Premier".** Within our state we have a handful of destination rivers that are rich in history, support local economies, and face a disproportionate amount of angler and environmental pressure. Examples of these rivers would be the **West Branch of the Ausable, the Beaverkill, and the Battenkill.** These rivers were at one time able to support a robust wild trout fishery, but environmental and tourism impacts substantially reduced their abilities to continue as wild fisheries, and the state years ago augmented these populations with stocked fish. Although the most desirable outcome for these river systems would be a transition to Wild Premier, it is unrealistic to expect that the confluence of peak summer water temps and

fishing pressure due to tourism would allow for a transition to the Wild category. Please consider the following for inclusion in this proposed category:

1. Inclusion Parameters:

a) Historical Relevance. The rivers have substantially contributed to the establishment of fly fishing in the US in the 19th and 20th centuries and continue to draw tourism based upon this history. The West Branch of the Ausable achieved prominence through the writing and innovations of Fran Betters (eg the Haystack and

Ausable Wulff flies), the Beaverkill is home to the Catskill Fly Fishing Museum and is generally recognized as the birthplace of flyfishing in the US, the Battenkill houses a the American flyfishing museum on the Vt side and inspired Lew Oatmann to revolutionize streamer fly patterns.

b) Existing local economic jmpact. These river systems typically support 4-10 fly shops, >10 licensed guides, and >5 hotels and/or campgrounds. NY Economic Development agencies support the promotion of tourism to the rivers, and local not for profit conservation groups have formed to support these ecosystems (eg. Friends of the Upper Delaware River, Ausable River Association). Sustainability and growth of these local economies are intertwined with the success of Fisheries Management.

c) Fishing Intensity and Access. The aforementioned rivers receive >250hrs/acre and have >Smiles of public access.

d) Stream Reach Quality. In addition to supporting a spring fishing season, these rivers support considerable opportunity for a robust fall fishery (eg. Significant Isonychia and October Gaddis populations).

2. Management considerations:

a) Thermally Relevant Stocking. These rivers typically experience an influx of tourism into the summer, which often results in a heavy impact on populations when combined with thermal stresses. As of this writing, the West branch of the Ausable has had 7 days of maximum water temp >70 in 2020 as measured at the USGS stream gauge, mostly in the third week of June. We should contemplate a stocking strategy to accommodate the unique stresses on these rivers including:

(1) Supplemental late summer/early fall stocking. Effectively moving to 5-6 stockings versus the planned 4.

(2) Stocking thermally resistant species (Rainbow Trout). It might be wise to weight the late spring stocking more heavily with rainbow trout due to their thermal tolerances, and brown trout in the fall due to their thermal susceptibility. An approach such as this may be

beneficial to hatchery management as two year old fish from both species will be available at those times.

b) Harvest. Harvest regulations on these rivers should mirror those of the Wild Premier category. This will benefit the river, and eliminate angler confusion with regulation.

C. Individual Stream Classifications:

1. Oquaga Creek. I have always found that Oquaga Creek is especially relevant to the West Branch of the Delaware River trout populations in the

springtime. During the month of March I have caught the largest rainbow trout of the year in the sections up to the top of the catch and release zone. I've always presumed these rainbow trout (18"+) were dropback spawning fish from the Delaware. Additionally, I have found that during times of high flows out of the Cannonsville Dam in the spring (typically the month of April), the brown trout in the Deposit section of the West branch move into the mouth and last mile of the Oquaga. I believe this is due to substantially warmer water in the Oquaga vs the Delaware at that time

(-10 deg.) and access to food. There is generally a substantial harvest that occurs during this time, and the proposed management plan would continue to allow for harvests of these fish at the most generous rates. **I propose that the state extend the Wild Premier status of the Delaware upstream to the start of the catch and release section on the Oquaga.**

2. North Branch of the Saranac River. The North Branch of the Saranac River is arguably one of the few Adirondack Rivers with the potential to progress towards wild premier status with habitat improvements. The upstream sections flow cold and will be appropriately managed as wild. The management plan calls for the lower section to the mouth of the North Branch of the Saranac River to be managed as stocked water, while at the same time the section of the Saranac River which it empties into, will be managed as stocked extended. Essentially these river sections are one contiguous ecosystem and fish move freely between the two. Anglers also fish both bodies of waters as if they were one. These split classifications will most certainly convolute your management of the rivers, complicate enforcement activities for officers in the field, and force inefficiency into the stocking activities. **Would the state consider classification of the North Branch of the Saranac river as Stocked Extended?**

D. Thank you for your time and consideration,

257) I have read the Draft Trout Stream Management Plan and have the following comments: While the desired outcomes for the plan as stated on page 10 appear sound, the plan on the whole seems to be a stalking horse for the most significant management initiative, that of year around fishing for trout in streams (pg. 22-23). Implicit in this proposal is fishing for spawning trout in the smallest of streams which support wild brook trout populations to the very small streams which support runs of wild five pound brown and rainbow trout from Pepacton Reservoir and other reservoirs and lakes and the Delaware River. With legitimate fishing comes foot traffic over redds, unnecessary fish handling, including selfies, while foul hooking and other behaviors outside the law will also follow. The authors of the plan seem unaware of the ethics of fair chase. Year around trout fishing may be reasonable in certain main stem sections of stocked streams. Some of these stream sections have already been designated for extended season or year around fishing.

Why is the year around season being proposed? It's hard to imagine any significant demand for additional fishing opportunity (pg. 23) since the plan recognizes the decline in angling effort on most trout streams (pg. 11). Is it because other states do it ? So what ? The contention that it will cause no harm (pg. 23) is supported by the all too clever phrase, " the science shows no evidence of harm at the population level " (pg. 23). What " population level " would that be ? At the stream level, watershed, state, or someones favorite wild trout stream ? No " evidence of harm " does not mean streams are not harmed by the practice of year around fishing, only that, at best, the design of the studies referenced did not permit a discernment of harm to fish populations which may have already been damaged.

The core management proposal of year around fishing is wrapped in five labeled stream management categories which, although presented as something new, are no more than five or six management strategies that were utilized over thirty years a go by fisheries managers in some areas of the state. The labeling of certain strategies does enhance transparency, but does not by itself, improve management. In fact it should be noted that the proposed angling regulations (pg. 24) for the five stream management categories are not restrictive. The vast majority of anglers on the majority of their trips would be either unwilling or lack the ability to creel the limits specified for wild trout anyway. There should be no illusions that the proposed regulations will improve fishing quality in these streams. In fact, fishing quality could decline in streams such as the Delaware tail waters with existing 12" and 14" size limits because wild trout under those sizes could be taken under the proposed (pg. 24) regulations for wild trout streams.

The argument that fishing regulations need to be simplified (pg 22-23) uses the straw man that existing regulations are needlessly complex. Most streams are currently managed under the statewide regulations. All an angler has to do, for the most part, is check the county listing to find out whether any special regulation is in effect for a stream of interest. An app for that could probably be developed. Regulations for the catch and release angler are largely academic anyway and these anglers are increasing in number (pg.11). In any case, the regulations do not need simplification through a year around catch and release season for trout. There are other ways to simplify regulations. As previously discussed, the five size and creel limit regulations proposed will not provide the degree of protection offered by some of the special regulations now in place.

The ability of the current strain of hatchery trout to provide extended in season fishing or fishing as holdover trout is limited. The need for improvement of hatchery trout quality is recognized (pg. 26) and that is noteworthy, as is the commitment to develop improved strains of hatchery trout.

At the present time too many trout are often stocked in too few places and under poor stream conditions when the water is too high or too cold to help insure longer term trout survival in the stocked area. Unfortunately, the plan section (pg.19-21) which discusses the management of hatchery trout does not seem to recognize deficiencies in existing stocking procedures or, therefore, the potential to improve fishing by improved stocking practices.

The draft plan discusses the decline in angler access over the years (pg.11). There has also been a loss in the number and accessibility of locations suitable for trout stocking. Since there are not enough staff available to properly distribute hatchery trout (pg 11) the numbers stocked should be adjusted down so proper fish distribution can be carried out. It is ridiculous to spend millions of dollars each year to rear hatchery trout only to over stock trout at a few access points, or stock when streams are too cold (less than 45 deg.) from snow melt, or too high and roiled by heavy runoff events. When trout are stocked under such conditions many are simply wasted. Numbers of hatchery trout reared should probably also be adjusted so that fish do not need to be pushed out of the hatchery too early in the season when streams are too high and too cold for stocking, simply to accommodate in-hatchery growth of too many

fish. Hatchery trout would not need to be stocked as often as every two weeks or four times a season (pg. 21) if more care were taken to stock only when stream conditions were suitable.

Criteria for stream conditions that must be in place prior to stocking are needed. The minimum stream temperature (probably 45-50 deg. F) and minimum and maximum stream flows needed to permit stocking to proceed must be spelled out. A minimum stream reach of three cumulative miles (pg.21) is specified as an access requirement for streams in the " stocked- extended " category. But how many stocking points are required in this three mile reach ? How many places must the hatchery truck be able to get to in any one mile reach ? What linear distance of stream is considered stocked from each stocking point ?

The limitations of the listing of stream reach categories in Appendix 2 should be stated. First, it should be recognized that the list omits hundreds of small wild trout streams. Further, it should be made clear what the list is for and what it must not be used for

258) I trust this letter finds you well. I have reviewed the “Draft Fisheries Management Plan for Inland Trout Streams in New York State”. First, my compliments to you and your team on this well-conceived and clearly written proposal for the future management of New York State trout streams. I fully endorse this plan which I believe establishes the proper priorities for wild and stocked trout management in streams based on known science.

Priority given to wild trout populations is important for the many reasons provided in the draft plan. I would add that research and management of wild trout populations will allow for a greater capacity to detect environmental changes which influence the entire life history of these populations. As such, the DEC will be in a better position to implement changes to management plans to protect and sustain wild populations. The draft plan further optimizes the use of stocked trout produced in the New York hatchery system which are very important to sustaining historical trout angling opportunities in many streams which don’t support adequate natural reproduction.

The sub-categories of wild and stocked trout populations are logical and appropriate. Focus on native wild brook trout populations in the development of the draft plan is appropriate and justified in my opinion. Where possible, it is important to protect and sustain wild brook trout populations as proposed in the draft plan.

I agree with the proposal to extend the angling season to year-round; with catch & release and artificial lures only from October 16 to March 31. Science and DEC stream surveys from a select number of year-round trout fisheries in New York, and in other states, support this proposed change in the angling season. However, if future surveys provide evidence that wild trout populations are adversely affected by year-round angling in specific streams, it may be necessary to modify the angling season in those streams.

I’m especially supportive of the “State of Operation” section on the draft plan on page 30. The approach outlined in this section of the plan - coupled with securing the services of a research scientist to identify, implement and assess habitat enhancement projects – is sound. Further, it will be important for the DEC to work with other scientists and private fish managers to fully implement and evaluate the details of this draft plan.

In conclusion, I support the concept and strategies to manage trout streams in New York State as stated in the draft plan. The plan will benefit wild trout populations, make better and more appropriate use of stocked trout, promote the environmental health of streams, and provide benefits to anglers and the non-angling public. All wild trout populations (whether native brook trout or non-native brown trout and rainbow trout) are of high value because they are indicators of healthy cold-water streams and rivers.

I wish you, the DEC and your partners all the best in your efforts to implement this trout stream management plan in New York State.

259) The Clearwater Chapter of Trout Unlimited would like to thank the DEC for the hard work involved in the writing the proposed regulation changes. We are in support of them as a major step forward in the management of New York's inland trout streams. Please accept all of our comments as ways to enhance the plan.

The Clearwater Chapter of Trout Unlimited fully supports the comments from the Battenkill Home Rivers Initiative and the New York State Council of Trout Unlimited. We especially believe in a watershed management approach that stresses evaluation, connectivity and the importance of protection of tributaries and headwaters. Clearwater TU strongly supports and endorses managing trout streams with priority to wild trout and habitat. We believe that communication lines should be established now to consider these issues. In the effort to simplify regulations we are concerned that management and stream improvements have been complicated. We strongly urge you to consider special regulations for specific locations to help with issues such as winter fishing in spawning areas and harvest limits in areas where efforts are being made to improve a stream from the Wild Quality to Wild Premier category, and where a Stocked-Extended reach is placed between two wild reaches.

Access is critical to recreational use by the general public. It should be pursued at every opportunity. DEC should increase its capacity to process Public Fishing Rights (PFR) opportunities efficiently and quickly. Rather than have regional biologists painfully perform the necessary groundwork, consider a central office team dedicated to those tasks. Landowner contact and title searches require a different skill set than those of a fisheries biologist. The goal is to quickly process PFR offers from willing landowners before they are lost. The compensation for PFR purchases should be significantly increased to more realistic amounts. One of the four purposes of the NYS Council of Trout Unlimited's Fisheries Enhancement Fund is the acquisition of PFR.

How can we help? Clearwater TU would like to form partnerships and work groups with DEC staff to collaborate, collect data, help with electrofishing surveys, perform redd counts, plant vegetation, and identify streams for potential upgrades and projects. TU members could also help, with guidance from DEC, with community information sharing and outreach, contacting landowners and building trust, erecting kiosks, locating "fishing permitted" signs, and organizational enhancement of PFR compensation (cash). We would like to engage TU members in educational programs that increase knowledge in ways that are valuable to the trout management plan goals. Some of this could be developed at the TU state level. Understanding there are limits to what volunteers would be allowed to do for the state, we will happily assist with anything we can do that frees time for a biologist to do habitat and fisheries work.

Again, we appreciate the effort DEC has undertaken to draft the Fisheries Management Plan for Inland Trout Streams and the opportunity to provide our comments. We look forward to our continued partnership and future work together to improve and restore New York's trout streams.

260) Ashokan-Pepacton Watershed Chapter – Trout Unlimited

Response and recommendations to the NYS-DEC Trout Management Draft Proposal

The Ashokan-Pepacton Watershed Chapter of Trout Unlimited applauds the efforts of the NYS-DEC to update the trout management regimen in New York State to better address current realities. Our bailiwick in the Catskill Mountains is the drainages of the Ashokan and Pepacton Reservoirs – the Esopus Creek, Upper East Branch of the Delaware, and their tributaries. We are the anglers who live, work, and raise our families on these waters. We are the people who are on these rivers every day. We know them best. We welcome this opportunity to offer our observations and opinions.

The reputation of the Esopus Creek as one of America's premier trout streams is well documented. It is widely regarded as one of the premier wild rainbow trout fisheries on the East Coast. As one of the Catskill drainages that comprise the "Cradle of American Fly Fishing," the Esopus is an irreplaceable jewel in the crown.

The APWC-TU fully supports the new emphasis on the wild trout angling experience. We cite the draft plan:

"The top five desired outcomes:" (page 10)

*The opportunity to catch wild trout and to a lesser extent stocked trout that have been in the stream longer that freshly stocked trout;

"Guiding Principles – wild trout" (page 13)

*We will always strive for self-sustaining populations with an emphasis toward native trout.

*Trout stream reaches will be managed according to their ecological

potential.
*DEC will not stock in a reach managed for wild trout.
The draft proposal lists the Esopus Creek as a “Stocked-Extended” designation. We believe the high fish density, robust health and density of the self-sustaining wild rainbow population, mean size of the stream, unparalleled water quality (maintained by the NYC-DEP as 40-45% of New York City’s unfiltered drinking water), quality of habitat, and widely available easy access make the Esopus Creek the poster boy for designation as a “wild” fishery. No current verifiable data exists, but the DEC’s own internal memo from 1976 cited 9,400 fish per mile. Surely today’s population density exceeds the 300 trout/mile parameter for “Wild” trout management designation published in the proposal.
Based on the defining parameters published in the draft proposal, we ask that the DEC re-designate the Esopus Creek as “Wild-Quality” from the Allaben Portal to the Ashokan Reservoir, and “Wild” from the Portal upstream to its source. We further ask that the tributaries to the Esopus Creek (the wild trout nurseries) also be designated “Wild” category. The importance of a contiguous watershed of varied habitat for robust trout propagation is well documented.
The deleterious effect stocked trout have on a wild population is also well documented. (Fresh 1997; Hilborn 1992) In contrast, the Gunpowder River in Maryland, the Little Juniata River in Pennsylvania, the Battenkill (in Vermont) are regional success stories of how wild trout populations blossom when stocking ceases. The DEC’s own draft “Top five desired outcomes” states that “management success should be based on more than just catch of trout per hour”. The DEC designation of the Esopus Creek as “Stocked-Extended” would seem to abrogate the DEC’s own goal of managing for a wild trout preference in favor of increased angler catch rate (CROTS management model). In fact, the published target of 21,927 stocked fish per year would make this pristine trout habitat the most heavily stocked stream in New York State! Why is the Esopus singled out for CROTS management in contradiction of the DEC’s own stated goal of emphasizing wild trout management?
A self-sustaining wild trout stream is a precious thing. There aren’t enough of them. The Ashokan-Pepacton Watershed Chapter of Trout Unlimited respectfully submits the above for your consideration, and strongly urges that you reconsider the proposed designation for the Esopus Creek.

261) I am writing to comment on the Draft Fisheries Management Plan on behalf of the Croton Watershed Chapter of Trout Unlimited. We greatly appreciate the time and effort you and your team have put into this plan. Here are our thoughts:

In general, we like the plan. The concept of classifying stream reaches makes sense. One observation is that the proposed online map showing all the reach designations becomes very important for educating anglers on the new system; and it is important that the map be ready before the regulation goes into effect.

While we have concern about the open season from Oct 15 to April 1, we believe it is worth a try. We hope the DEC will be vigilant in monitoring this, and open to feedback from the public for any problems that arise.

We are concerned that there is no mention about limiting live bait or the use of treble hooks. We feel there is no place for these anywhere, but particularly in the Wild steams.

The stocking of larger fish as 10% of the total is very desirable to increase angler

satisfaction. We do have concerns that available DEC manpower and funding will be able to meet this requirement and stocking four times per year in the Stocked Extended streams.

We have a couple of particular issues with classifications and the stocking plan in our region. These are:

We think that the Amawalk Outlet from Wood Street to the Muscoot Reservoir should be classified as Wild or Wild Quality. This is a wonderful stretch of water that holds wild fish coming up from the reservoir. We are fine with stocking the stream where it crosses RT 35, which is the normal case. However, we would like the regulation to prohibit stocking at Wood Street which happened last year.

We are puzzled by the stocking plan for the East Branch of the Croton River. The plan indicates stocking about 1500 fish from the East Branch Reservoir to the Diverting Reservoir and 5500 fish from the Diverting reservoir to the Muscoot Reservoir. We feel these levels should be reversed - more stocking between the East Branch and Muscoot Reservoirs.

Thank you again for all your effort on behalf of our trout fishery. Please do not hesitate to contact me if you have any questions regarding this letter.

262) My personal thoughts and recommendations

Pros:

1.) I can't tell you how overjoyed I am that you are giving our upper delaware river system the highest rating your plan allows. I believe we truly deserve the "Wild Premier" status and taking it one step further would say we have the best wild trout waters in N.Y. State. I do think in considering all comments going forward I would encourage all reviewers to look at the upper delaware system worthy of "special considerations". Not just because the upper delaware is so close to my heart, but because biologically and ecologically science proves that tail waters will be the best and final strongholds for all aquatic species that require clean cold water to survive. Sad but true, climate change is the trout's worst enemy, and cold water bottom releases are their strongest ally going forward.I hope you and your team might also consider this a strong and justifiable case for "special considerations".

2.) I am elated that you are considering dropping the trout in possession to 1 trout, any size, per day in our entire reach, bravo!

3.) I totally support considering the ending of stocking in the East Branch as well as any tributary of the upper delaware system (including Oquaga Creek in Deposit). It's been my experience over living and working in the area for 30 years that "wild trout" are the reason people are drawn here to fish. You guys know all the science that validates stocking fish in a wild trout system is not a great idea. I would leave the Beaverkill alone here because, well, it's the Beaverkill!

4.) I fully support any part of the new plan that addresses restoration work to enhance habitat for trout in the state, foremost helping get better "cold water releases" during crucial times when rising temps will exceed thresholds that trout can endure. As they say "we have the technology" here, nothing would protect and enhance our tail water fishery in a more significant way, all science proves that unequivocally.

5.) I appreciate the "simplifying" of potential new regulations and look forward to seeing maps that will show and define new regulations for "reaches" throughout the state.

My suggested changes to consider in new plan:

1.) Fred my Man, I know this is the 1,000lb. Great White in the room, jaws wide open, but boy if you guys could get some verbiage in the plan that addresses thermal stress and asks for some water at the appropriate times you'd have a home run. There I said it, next……...

2.) Probably the second most important consideration I would like to see the new plan address is extending the "Wild Premier" status reach from Lordville to Callicoon. This section has all the same features as the waters above Lordville and is a "go to" section for thousands of trout anglers annually that want to get away from the crowds and search out the "elusive bank sippers"

that live there. One could argue that this stretch should get special consideration during hot periods as the cold releases from dams are less protective this far down river. Regardless, this is an amazing reach extremely worthy of the "Wild Premier" level of protection and it offers a unique fishing experience, (truth be known, it is my favorite stretch of the entire system).

3.) After looking into science that either supports or challenges that fishing over wild spawning trout is detrimental, I have not yet found any realative evidence that this has been proven either way. Therefore it's my opinion to give spawning fish a break, at least in the fragile upper delaware river system including it's tributaries. You guys know where the fish are spawning from the redd counts we have all been a part of. Let's error on the side of caution and keep human presence out of the mix and let the adult fish alone while they "do the deed" and don't trample or drag anchors across their eggs or the heads of their young during this fragile time of their lives. We can follow progress here in the future but you could just grandfather in current regs that seem to be working and maybe revisit at a later date with more data to back things up.

4.) I would also encourage a tackle consideration in the upper delaware system looking at single hooks only

5.) I would encourage thoughtfully designed and placed signage that informs anglers of new plan once decided upon. Signage might also help with enforcement and prosecution of those breaking the law.

6.) I would encourage a public comment period allowing public one last look after you have a refined plan that you feel is "ready to go". It would be great to just to see if there are any glaring protests after your review.

I'm sure I'm missing something but trust your team will continue to do all you can to make the Upper Delaware system and the rest of the state a better and safer place to fish. Again thanks for the huge effort to protect the resource and wade(intended pun) through this emotionally charged process.

All the best Fred, and I would greatly appreciate you letting me know you got this, and that I did everything I was supposed to do to be heard and counted lol……...

263) I would like to submit the following comments on the Draft Inland Trout Stream Management Plan. There are many laudable aspects to this plan but it also suffers from a number of critical shortcomings. I offer the following comments about those shortcomings. 1. The philosophy of the draft plan, stated on page 13 of the draft, states that the stream reaches will be managed on a combination of ecological and recreational potential. I strongly encourage that ecological potential should have the highest priority especially when ecological goals conflict with recreational potential. A sound plan should embrace a "Resource First" philosophy that prioritizes ecological considerations that would lead to sustainable native trout fisheries even at the expense of angler satisfaction. 2. The draft plan does not make a clear distinction between native trout fisheries and wild trout fisheries. A sound management plan should make a clear distinction between the two. Decisions on stream management should focus on the creation of sustainable native trout fisheries even if this means eradication of competing non-native wild trout, i.e. brown and rainbow trout. There plan should develop an strategy for identifying targets of opportunity for non-native trout removal practices, e.g. catch-and-kill regulations or reclamation, so as to remove invasive trout species competition where native brook trout species are present in their aboriginal range. As an example, such plans have been implemented by the National Park Service within the brook trout streams of the Blue Ridge Parkway. 3. The draft plan does not categorically reject the stocking of hatchery fish on top of native brook trout populations even when such populations have been demonstrated to be viable and sustainable. Perhaps the most egregious example of this is the continual stocking of invasive brown and rainbow trout on the middle reaches of the Carmans River in Suffolk County (Region 1) where a strong brook trout population exists. The

peer-reviewed scientific literature is replete with research that definitively demonstrate the negative effects of stocking invasive trout on brook trout populations within their aboriginal range. The Eastern Brook Trout Joint Venture has clearly identified stocking of non-native salmonids as one of the major threats to the continued existence of wild brook trout populations. It is time for the NYS DEC to fully embrace this reality even in the face of dissatisfaction from some components of the angling community. 4. Halting the stocking of non-native salmonids on streams with sustainable wild brook trout populations is an experiment which can always be reversed, i.e stocking can be restarted. Therefore, the draft plan should emphasize the identification of streams where stocking can be halted and the subsequent effects on native brook trout populations can be studied to scientifically justify future management decisions. The Commonwealth of Massachusetts has done this experiment on streams such as Red Brook (a tributary to Buzzards Bay) which have seen strong rebound and growth of native brook trout after stocking was halted. 5. The draft plan should place a special emphasis on habitat restoration on a special class of native brook trout streams that have a high potential to withstand the stresses of climate change. In particular streams that are groundwater fed and which maintain years round cold temperatures, such as those in glaciated terrain, have the highest likelihood of successfully maintaining sustainable brook trout fisheries in the face of continuing climate change. Therefore such stream should be designated as belonging to a special class of streams that would receive the highest level of protection via management decisions that would be focused on protecting the brook trout populations in those streams. 6. The notion of managing different reaches of streams separately is a laudable goal but if only makes sense to do so when those reaches have some physical barrier or changes in stream characteristics, i.e. changes in fluvial geomorphology, that would justify managing on reach differently from an adjacent reach. If two adjacent reaches of a stream both support wild brook trout populations, and those two reaches have no barrier to communication between them and no habitat differences, there is little reason to manage one reach as a stocked trout fishery while managing the adjacent reach as a wild trout fishery. 7. The draft plan should have a strategy for identifying how inland trout streams can be managed so as to create sustainable native trout fisheries without stocking. The present plan mentions habitat considerations bu the long term goal should be to improve streams, where possible, so that sustainable populations of native trout can be maintained. Thank you in advance for your consideration of these comments.

264) We write to you on behalf of the New York City Chapter of Trout Unlimited (NYCTU), the largest Chapter in New York with more than 700 active members. Firstly, we very much appreciate and recognize the complexity of this vast undertaking, as well as the tremendous effort in time and commitment that you and your team have expended in the preparation of NYSDEC's Draft Fisheries Management Plan for Inland Trout Streams (the "Plan"). Secondly, we thank you for this opportunity to provide our comments on the Plan in the hope that they will be considered valuable as it moves toward completion and implementation. As you will recall, NYCTU has participated in this effort from the outset, including DEC's public meetings in Long Island City in 2017 and in Hicksville last October, as well as engaged in dialogue with your team at various meetings and fora, including presentations at our State Council meetings. As a TU Chapter, our oft-stated mission is to conserve, protect, and restore North America's coldwater fisheries and their watersheds, with the long-term goal of supporting and promoting self-sustaining wild and native trout populations. And as a "local" Chapter, our specific mission is contributing to the maintenance, enhancement and expansion of sustainable fishing and trout habitat throughout our State. We are very pleased to see that DEC has prioritized the importance of establishing self-sustaining wild and native trout populations through the establishment of the "Wild," "Wild-Quality," and "Wild-Premier" categories and emphasized that both fishery habitat protection and enhancement are integral components of the Plan. We write now to express our support for this Plan, as well as to support the responses and recommendations of both our State Council of Trout Unlimited and other Chapters. Our comments focus primarily on the watersheds within DEC Regions 3 and 4 that we are most familiar with, including those where we have already engaged in extensive conservation, and are currently exploring and proposing potential future projects that we will help to further the Plan's goals. We hope that you will find these comments helpful as you

move toward finalization of the Plan. Questions and concerns on the Plan ● Desire more specificity around DEC's approach to habitat protection and enhancement ● Concerned with the proposed "Extended" Catch and Release Season ● Concerned with loss of current special regulations on the Amawalk and Mongaup below Rio Dam ● Questions on how "unassessed" and presently unstocked streams with signs of potential will be addressed Suggestions to improve the Plan ● Implementing a statewide "Trout Stamp" with funds earmarked for habitat projects ● Greater protection (C&R and habitat efforts) for native Brook Trout, especially "heritage strain" ● Greater protection for wild trout in stocked streams: ○ C&R for non-stocked species (e.g. wild rainbows on the Esopus) ○ Encouraged C&R otherwise (e.g. wild Brown Trout in the BeaMoc, Neversink etc.) ● Maintain the current closed season in all streams with wild trout populations ● Regulation on appropriate tackle, especially on wild trout streams (e.g. single point hooks) ● More discussion and consideration of existing "No Kill" zones ● Extending the existing "No Kills" on the BeaMoc (already extensive) the full extent of the streams ● Consider restoring the Amawalk as a wild trout fishery worthy of a Wild-Quality designation We elaborate on each of our questions, concerns and suggestions below, under the following three topics: 1. Habitat Protection and Enhancement 2. Wild Trout 3. Category Assignments and Exceptions 1. Habitat Protection and Enhancement Desire for more specificity around DEC's approach to habitat protection and enhancement The Plan properly places great significance on the importance of habitat protection and improvement. We support this priority and, as a Chapter, will assist in these efforts to the greatest extent possible in the coming years. However, we believe that the Plan lacks sufficient specificity and particularity in respect of how DEC intends to achieve these laudable goals. The very viability of this plan is dependent upon DEC's and the fishing community's ability to achieve major improvement of trout habitat throughout the State. To this end, we suggest that the Plan should set forth more detailed language regarding: ● How DEC intends to approach the various aspects of habitat protections, rehabilitation and enhancement on a forward-going basis throughout the reaches and watersheds that will be impacted under the Plan. By providing such details, we believe DEC will be able to both inform and engage the conservation and angling communities as to how it intends to implement and achieve the Plan's goals, and it will, as well, allow for the setting and review of "benchmarks of achievement" of these goals. ● How DEC's habitat planning and approach will be designed and executed to best facilitate and enhance the quality of those stream reaches that are to be designated as Stocked-Extended, particularly for our Chapter's purposes and engagement in the Beaver Kill/Willowemoc and Neversink watersheds, as well as the Esopus and Croton watersheds stewarded by other TU Chapters. 2 Recommend implementing a "Trout Stamp" with funds earmarked for habitat To create additional funding for habitat projects, we believe that DEC should implement a "Trout Stamp" program (as has been done in many other States), with funds specifically earmarked for DEC-sponsored stream restoration and habitat projects in a manner consistent with the overall execution of the Plan, and in coordination with other funding sources and local conservation partners. 2. Wild Trout Recommend greater protection for native Brook Trout, especially "heritage strain" We applaud and welcome DEC's commitment through this Plan to "strive for self-sustaining populations with an emphasis toward native trout (Brook Trout)," and are particularly encouraged to see that an "updated state-wide" Brook Trout management plan is "the next coldwater species management plan on the DEC agenda." However, while this Plan states that "a more restrictive [Brook Trout] harvest regulation was carefully considered," we are disheartened by DEC's conclusion that "there is little opportunity to achieve a conservation or fishery benefit from more stringent regulations." The Brook Trout is not only our native 'trout,' it is the State Fish (a designation first given in 1975), and we believe a greater recognition should be given to that status. Environmentally, the Brook Trout is also the proverbial "canary in a coal mine" and extremely susceptible to damage from storms, climate change, elevated temperatures and the encroachment of development. Hence, the Brook Trout has experienced continually dwindling numbers. For these reasons, we strongly suggest that the Brook Trout be subject to an expansive "Catch and Release Only" regulation throughout the State, with specific enhanced efforts given for its habitat protection and enhancement. While most abundant in headwater streams and tributaries, Brook Trout are also found in numerous larger streams in the region, and we believe

should be afforded such protection wherever they exist. In addition to Catch and Release regulations for Brook Trout generally, we believe that additional attention should be given to streams and reaches where native Brook Trout have been identified as being of a unique "heritage strain." While such waters are likely small and do not face great fishing pressure, we believe these "heritage strains," being direct descendents of the native populations that once flourished throughout the State, should be recognized for their unique ecological, scientific and historical importance. We would also urge that DEC and its conservation partners engage in much broader efforts to locate and identify these various strains and afford them additional habitat protections so that their lineage is not interrupted, and to communicate their value to the public at large. Recommend greater protection for wild trout in all stocked streams We accept that the stocking of hatchery trout into our fisheries is necessary because our many streams are simply unable to produce and sustain a self-sufficient, naturally reproducing trout population on their own. However, it is also important to note that there are still wild fish thriving in many of our stocked streams (particularly those being classified as "Stocked-Extended"), despite the predation, direct competition from hatchery fish, habitat impairment and angling pressure they face. Presently, under the Plan, both wild and stocked trout would be equally fair game for the creel, as they are today. Since an aspect of the Plan is the establishment of more resilient and self-sustaining wild trout populations, we recommend further emphasizing the importance of wild trout (along with corresponding habitat protection and enhancements) by implementing the following: ● Catch and Release restrictions should be implemented for all reaches where DEC has identified the presence of wild trout that are of a "non-stocked" species (e.g., wild Rainbow Trout on Esopus Creek which haven't been stocked since the 1980s, and throughout the Upper Delaware River watershed where they were accidentally introduced in the late 1800s). 3 ● Catch and Release should be encouraged with respect to wild and holdover trout of a stocked species (e.g., Brown Trout), by educating anglers on how to distinguish wild trout from hatchery fish (e.g., through clear signage at public access points on accepted visual cues). Concerned with the proposed "Extended" Catch and Release Season We are particularly concerned about the potential negative impact of the proposed "extended" Catch and Release Season during the Fall-Winter-Spring months on wild trout populations, especially for streams in close proximity to New York City and other large metropolitan areas that experience greater fishing pressure. We also question the conservation ethic of allowing the targeting wild fish when they are most vulnerable. Our belief is that we are fortunate to have wild trout, and we should undertake every effort possible to mitigate the challenges they already face, not add to them. We believe a preferable means of proceeding is to maintain the current closed season in all streams (and their tributaries) with wild trout populations. We hope DEC fully considers the many concerns of local anglers and conservationists in this regard when finalizing this aspect of the Plan. Suggest regulations on appropriate tackle Like our colleagues from Friends of the Upper Delaware, we also noted that the Plan did not address tackle. Our preference, especially on wild trout water, would be for single point hooks to minimize both fish injury and Catch and Release mortality rates. 3. Category Assignments and Exceptions Suggest more discussion and consideration existing "No Kill" zones, including their extension We concur with DEC in the proposal for "grandfathering" of most "Catch and Release Only" reaches as set forth in the Plan and we are further encouraged by the suggestion of additional "experimental" C&R that may be considered on "formerly stocked reaches" or on "Wild reaches that has been converted to a Wild-Quality." To this end, we believe that the Plan would be substantially improved by more discussion and consideration of certain specified reaches already identified that we believe should be given priority consideration for such "upgrades" and broader restrictions. In particular, we strongly suggest, consistent with the recommendation of NY State Council, that the implementation of regulations under the Plan be done on a "watershed-wide" basis, rather than a "reach-wide" basis. For example, we would recommend that Catch and Release restrictions presently in place on certain reaches of the Beaver Kill/Willowemoc Creek, which are already extensive, be further extended throughout the entirety of that watershed so as to provide greater protection to wild trout. The "BeaMoc," is a continuous stream, and there is no question that the fish in these reaches, many wild, are constantly in motion. These movements occur as the trout move upstream following "the hatch" in

search of food, during periods of high water, and during high temperatures (a recurrent problem on the lower Beaver Kill where it is not uncommon for water temperatures to reach near fatal temperatures). We note that this recommendation is also consistent with that of FUDR with respect to the Upper Delaware River, wherein they recommend that the UDR C&R reach/restrictions be extended downstream from Lordville to Callicoon. Concerned with loss of current Special Regulations on the Amawalk and Mongaup below Rio Dam We recognize and agree with DEC's desire to simplify the special regulations that have built up over the years. However, we are greatly concerned by the possible negative impact of removing the current 'artificials only' and minimum size restrictions while also increasing the daily creel limit on the Amawalk Outlet and Mongaup River below Rio Dam; both are waters where we have either conducted or are working on proposals for habitat restoration. 4 In our view, none of these changes can conceivably contribute to the improvement of those fisheries, yet the Plan does not provide any rationales for them. ● The current restriction regimens on the Amawalk Outlet would change from 'artificials only' and 3 trout ≥ 12" to Stocked (5 trout, max 2 ≥ 12"), with open season extended from September 30 to October 15. Our understanding is that the lower 2 mile reach of the Amawalk Outlet below the old mill dam was once an excellent wild Brown Trout fishery but has become impaired, primarily through human impact rather than deficient habitat. It is currently rated Class A(TS). We have conducted four riparian tree plantings under the auspices of NYC DEP (together with members of Croton Watershed Chapter TU) on sections of the Amawalk each spring for the last four years to improve the banks and enhance cover and have also surveyed the site for a larger potential habitat improvement project. Given the ease of access, we are concerned that the loss of the current special regulations may result in the loss of the wild Brown Trout trout population that remains. ● Similarly, the current restriction regimens on the Mongaup River below Rio Dam (downstream to the Route 97 bridge) would change from 'artificials only' and 3 trout ≥ 12" to Wild (5 trout, max 2 ≥ 12"). It is our understanding that the special restrictions on this reach of the Mongaup River were put in place to help preserve the wild Brown Trout population which uses the lower Mongaup River and its tributaries in the area for spawning. Our concern is the same: that the loss of the current special regulations may result in higher harvest of wild fish, in this case, fish that already have to contend with frequent, significant, and sudden changes in streamflow as a result of releases from Rio Reservoir for power generation and recreation. For both of these streams, we would like to better understand the rationale for the changes as it will inform our approach to habitat projects on them, and hope that DEC will consider maintaining the existing 'artificials only' restrictions (or consider them for C&R protection). We are also curious of the biomass of each; and specifically: 1. Whether DEC would have an appetite for restoring the Amawalk Outlet as a wild trout fishery worthy of Wild-Quality designation? 2. Whether the reach of the Mongaup River below Rio Dam might similarly qualify as, or show signs of potential to qualify as, Wild-Quality? Questions on how "unassessed" and presently unstocked streams with signs of potential will be addressed While reviewing the Plan in relation to other potential habitat projects we are investigating in the Mongaup River system (through our involvement in the relicensing process for ECRE's Mongaup River Hydroelectric Project), it was unclear to us how streams that are currently "unassessed" or presently unstocked, but show potential, would be addressed. ● At least one of the streams we are looking at is "unassessed," yet there is evidence to suggest that it may have sufficient biomass to qualify as Wild-Quality. Would an upgrade such as this be considered under the Plan, despite its "unassessed" status? ● Another stream in the system, currently rated Class B(T), looks to have the potential to become a much improved fishery. To the best of our knowledge it has not been stocked. We are curious whether a change in classification to Stocked, or habitat enhancements and experimental C&R to elevate it to Wild-Quality, would be considered under the Plan? * * * 5 Thank you for considering our comments. We greatly appreciate and support NYSDEC's creation of this new and updated plan and thank you for undertaking the effort. We look forward to the final plan and working with NYSDEC to conserve, protect, and restore the region's coldwater fisheries and their watersheds.

265) On behalf of the Catskill Mountains Chapter of Trout Unlimited, I would like to submit the following comments on NYSDEC Draft Fisheries Management Plan for Inland Trout Streams in

New York State. Our chapter is pleased that the Fisheries Management Plan recognizes the value of wild and native fish. With this we applaud the inclusion of Wild, Wild-Quality and Wild-Premiere as a recognition of special trout waters within the state in support of sustainable wild fisheries. Given the loss of habitat for wild, native brook trout over the years, we hope this will lay a foundation for its sustainability. The chapter is also pleased to see that habitat restoration is an integral part of the management plan and that there are provisions to improve wild designated reaches to wild quality reaches. However, the draft plan also highlights some areas that we have some questions and concerns. These include: • the lack of any mention of sustainability as a goal in the plan; • the lack of any mechanism to develop Stocked-Extended streams into Wild-Quality streams; • the failure to account for the wild population of rainbow and brown trout in Esopus Creek; and • the dramatic increase in stocking planned for Esopus Creek. The vision for the plan specifically highlights the goal of maximizing the "ecological and recreational" potential of inland trout fisheries. However, it does not explicitly recognize the sustainability of fish populations as a long-term goal. This is a significant oversight. Having sustainability as a stated goal would demonstrate DEC's commitment to creating excellent recreational opportunities through better management practices for wild fish. The failure to include any plans to develop Stocked-Extended streams into Wild-Quality streams is another major concern. Our home stream, the Esopus Creek, has a long history of coexistence of both wild and stocked trout. The Catskill Mountains Chapter of Trout Unlimited has long advocated for more sustainable management and fishing practices that would improve the wild fishery and allow it to expand to its full potential. Overall, the Draft Fisheries Management Plan does not acknowledge the presence of sustainable wild fish contained within reaches of streams designated Stocked-Extended. The lack of acknowledgement extends to the absence of a management plan that would help the wild trout populations grow and thrive, expanding the value of the fishery to anglers within the state. The management plan does not include a management policy with the goal of improving the fishery so that it could transition from a stocked reach to a Wild-Quality stream in the future. In addition, we recommend including justification for designation of specific classifications. (i.e. why was the Esopus designated stocked extended when it supports a significant wild breeding rainbow and brown trout populations) We are particularly concerned about the management plan and reach designation of the Esopus Creek. The new plan calls for an increase of 4800 more fish to be stocked in Esopus Creek, making it the most heavily stocked stream in the state based on the published numbers within the plan. This is despite the fact that both our chapter and the Ashokan-Pepacton Watershed Chapter—the two TU chapters most concerned with Esopus Creek—have consistently called for less stocking. We are concerned that DEC has made this decision based on data from Robert K. Angyal's 2017 report "Esopus Creek Creel Survey and Electrofishing Survey 2010-2013. While technically an excellent report, Esopus Creek experienced several major floods during this period, including major flooding in January 2010, tropical storm Nicole in September 2010, and most devastating of all, Hurricane Irene in August 2011 and Tropical Storm Lee two weeks after that. The combined effect of these storms—and the in-stream construction work done in the aftermath of the 2011 storms--had a major negative impact on wild fish in these streams, particularly the rainbows. In the past decade, though, the rainbow population has bounced back nicely. For that reason, it is dismaying to see it now threatened again by stocking practices. In order to accurately assess the health and potential of the wild populations of rainbow and brown trout in the Esopus Creek, electrofishing surveys should be conducted of a yearly basis. Currently the NYSDEC does not have up to date information on wild trout populations in this river. CMTU would like to see Esopus Creek managed as a Wild-Quality or Wild-Premiere fishery for rainbow and brown trout with strong interest in catch and release regulations to protect and improve the historic wild fish populations in the stream. Our comments recognize the exclusion of lakes and ponds in the draft management plan. However, the inland trout stream plan should recognize the fishery at a watershed level to account for the fact that spawning fish from lakes and reservoirs move up out of the lake into the rivers and tributaries during spawning season. After much discussion of the proposal to create a winter catch-and-release season, the Chapter remains divided on the issue. Many members are concerned about the impact a winter catch-and-release season will have on

spawning fish. There is concern that anglers in the stream will disturb spawning fish and step on redds. However, other members pointed out that several states with healthy trout populations already have year-round seasons, and Esopus Creek in particular has an extended fall season that overlaps with the brown trout spawn and that the regular season opens while the rainbow's spring spawn is still underway. However, all members agreed that no matter what aspects of the plan DEC eventually adopts, better enforcement of New York State fishing regulations is desperately needed. Despite the fact that the members of our board are avid anglers who spend many days on the water each season, none of us could recall ever having our fishing license checked by an Environmental Conservation Officer in New York State. In addition to ensuring anglers are valid license holders, better enforcement of angling regulations would reduce take of fish exceeding daily limits, which members of our chapter have observed. Enforcement upholds angling regulations and results in direct and immediate management of the fishery. Thank you for taking the time to consider our feedback, we look forward to working together to protect our cold-water fisheries in New York State.

266) The three Region 9 Chapters of Trout Unlimited - Upper Genesee, Red House Brook, and WNYTU - would like to express their wholehearted support as a group for the proposed Inland Trout Stream Management Plan.
From the very beginning you have included the opinions and wishes of the general public in crafting the plan beyond a level seen in the past, for which you are to be commended. The plan successfully incorporates the most frequently expressed wishes of the angling public, while working to protect and enhance the fishery itself.

As representatives of Trout Unlimited, we especially appreciate the increased emphasis on DEC dealing with aiding in habitat issues and habitat improvement in the coldwater streams of NYS. Here in Region 9 the DEC Fisheries personnel has a long and valued history of doing that already and we appreciate that that will now be an official emphasis of the Dept. We've been blessed here to have Fisheries Managers for several decades who have wholeheartedly supported that locally.

While "trout fishing" is not an official issue for Trout Unlimited, the reality is that most of us got involved because of trout fishing. For a number of years now – as early as the mid-90's on one stream – we have had an extended "artificials only, catch and release" season on a number of streams. This has proven popular and has not had any negative effects that we can see. We're glad to see this extended to all streams now. The more people we can get out fishing for more time, the easier it will be to interest people in protecting the resource.

We think the identification and management of streams on a "reach" basis is a good idea. While TU officially would like to see streams managed on a watershed basis, this is just not a practical approach in NYS, since "Fisheries" can only manage streams which you are allowed to manage, so that is out of your control.

Finally, you've assured us that this is a "dynamic" plan and that consequences will be monitored and the plan altered if necessary. That is certainly needed for any such mammoth endeavor. Congratulations on a job well done,

267) The NYS Conservation Fund Advisory Board would like to thank the Division of Fish and Wildlife for the opportunity to comment on the draft Trout Stream Management Plan. There was considerable outreach performed to the sporting community on this draft plan and that is appreciated. In addition, Steve Hurst appeared before the Board on July 8th, 2019 - to provide an update on the public meeting process and the steps taken in drafting the plan. Mr. Hurst then provided an additional update on May 18th, 2020 to CFAB members with a summary of the public outreach process and the contents of the draft plan. A concern often raised to CFAB members is the complexity of the fishing regulations in various parts of New York State. That being said the simplification of these regulations will be a significant benefit to the angling community and CFAB strongly supports those efforts. There were two items that CFAB ask be evaluated in the draft

plan before it is finalized. First, the plan references specific locations of wild/heritage trout strains on pages 40-74. CFAB would support a broader location be attributed to the location of these wild fish if that is possible. Secondly, on page 34, under “Implementation and Evaluation” there doesn’t appear to be a re-evaluation of the plan and modification if necessary. In summary, CFAB would like to thank the staff that worked to complete the plan and we look forward to the continued improvement of angling opportunities in New York State.

268) Thank you for this opportunity to comment on the current May 2020 draft of “Fisheries Plan for Inland Trout Streams in NYS.” We focus our comments on the cold water streams and conditions on Long Island — with its dense population and high angler pressure — particularly the Carmans River, one of the few remaining streams of extraordinary quality and uniqueness with a fecund, self-sustaining wild native brook trout population, which we would like to keep that way — and improve. We are an environmental, Town of Brookhaven-based organization which administers a management and trust fund specifically earmarked for the Carmans River watershed, but includes issues of other related watersheds here on the Island, particularly those of cold water streams, which is the subject of the State’s Plan. We note that the Plan is written specifically for the benefit of trout anglers, with attention to the ecology of the fish and their habitats in our cold water streams as an interrelated, but, at times, secondary issue. To that end, in submitting our comments, we have conferred with and coordinated thoughts and input from individual anglers, other organizations sharing similar concerns, and the trout anglers on our Board of Directors. As a result of compiling information and comments from Carmans River anglers, we are requesting that eight general areas for the Carmans River management be re1 evaluated and revised by the State for final publication, for the benefit of the resource and, ultimately, the enjoyment and success of greater finesse in the art of angling, and be made as follows: 1. REACH CATEGORY. Re-categorize the reach of the Carmans River above “C” gate to its headwaters from “Stock-enhanced” (page 58) to “Wild” based on the current conditons of the existing wild, self-sustaining native brook trout population. The wild, native population of brook trout in the Carmans can be characterized as fecund but fragile with a distinct opportunity, given proper management, to recover and grow to full ecological carrying capacity. The erroneous categorization given on page 58 is in conflict with the Department’s guiding principles for wild trout as stated on page 13: • We will always strive for self-sustaining populations with an emphasis toward native trout (brook trout). • Trout stream reaches will be managed according to their ecological potential. • A stocked reach may have wild trout, but a wild reach does not have stocked trout (i.e. DEC will not stock in a reach managed for wild trout). [Bold is ours.] 2. STOCKING. Discontinue stocking the stream anywhere above the cement structure at “C” gate above Hard’s (Southaven Park) Lake. To halt stocking would insure removing the predatory non-natives, including the voracious >12” brown trout and super rainbows. The removal of these non-native and predatory fish will allow the wild native trout to recover and grow to full ecological carrying capacity. Similarly, stop encouraging the presence of predatory warm-water fish. To drive home the importance of the request to halt stocking in the Carmans, more than a few of the anglers who contributed to these comments shared stories of having an eight-to-twelve-inch brook trout on their line being suddenly devoured right before their eyes by a four-pound bass or >12” brown trout. 3. COORDINATE FISHERIES DIVISIONS WITH PERMIT ADMINISTRATORS In the Carmans, the threat to native brook trout by voracious non-native trout stock has been compounded by the presence of equally voracious warm-water species and unacceptable management practices and procedures permitted by the Department upstream. When the boards were pulled from Lily Lake (the lower impoundment in Yaphank) in recent years, an event resulting in unacceptable levels of life-threatening sedimentation downstream to trout spawning, a flush of the warm water species, including one ten-pound bass reported by one angler and many trout-fry-eating sunfish, were released in huge quantities, pouring right over the dam without any attempt by the 2 Department to require the removal of this voraciouos population before their permitted removal of the boards. We strongly urge the coordination between the Fresh Water Fisheries division and the Permit Administrator as an active procedure and iron-clad requirement in all regions, to prevent the harm so evidenced in Region I. 4. MONITOR. Monitor the result of discontinued stocking for at least three years in order to evaluate increased productivity and

health of the resource. Include an analysis of the ultimate benefit to anglers, comparing it to the phenomenal benefit that occurred in a similar program that halted stocking in the streams of Cape Cod. We understand the attenuation in DEC staff and resources, but assistance with such monitoring efforts could be coordinated and carried out with the help of citizen scientists and stakeholder groups in cooperation with the Department. 5. LONGEVITY. We are asking for an analysis of longevity (year class) of the brook trout population in the Carmans, as we suspect it may be less than is currently held, a critical element in managing this unique, uncontaminated-by-hatchery-brook-trout population of Carmans native brook trout. Commenters in our group reported that at the last meeting of Region I Fresh Water Fisheries, the annual report from staff, based on electrofishing, was that they were seeing little impact from stocking on the native trout. However, when asked how long the brook trout of this stream live, the staff did not know. Longevity within a specific stream of this quality is a critical issue which requires an answer from the Department, for if it is three years, the loss of a one-year class, for example the stressors which may result from the Lily Lake event, could mean a permanent, irrecoverable loss in the population. The jury is out as to whether this is exactly the case in the Carmans currently. We do not yet have an analysis on the impact on the spawning population below the Lily Lake dam as a result of the significant negative impact series of sedimentation events resulting from a Department permit which allowed dredging in the upper and lower impoundments over the last few years. Similarly, the Department at the State level should be offering assistance and encouragement for the Regional Departments' staff to capitalize on opportunities to age the specific and unique population of their rivers, such as the Carmans. When a sample population of twenty brook trout of the Carmans was tested for whirling disease a number of years ago (we believe Fred Henson was present), the Department captured a sample of twenty brook trout and cut their heads off to test the brains. Simultaneously this offered the opportunity to look at and record the age of the population determined from the otoliths in their heads, which indicate age accurately. It is this sort of assistance and establishing data that we are requesting the Department at the State level provide to Regions to help formulate an effective management plan and that it be so stated in the Final Plan. 3 6. EASTERN BROOK TROUT JOINT VENTURES INITIATIVE (EBTJV). The Department once participated in EBTJV, a cooperative program bringing national and local agencies, fishing and environmental organizations, and individual anglers together. We are requesting to know what happened to DEC participation in this program, and what principles, if any, were learned by the Department and have remained. 7. YEAR-ROUND TROUT FISHING. We question the wisdom in the wild reaches of any NYS rivers with a tenuous, declining or otherwise fragile native trout population to be opened for catch and release year-round. It would seem out of the question for the Carmans River. As it is, the anglers who contributed to these comments see, on a sad constant and common basis, the mutilated lips, especially in the young, of brookies which appear may be left to die under the current catch and release program. To extend this season all year long offering more frequent handling might be considered a death knell. The river above "C" dam should be kept wild and managed with the "strictest regulatory approach" as referenced in the State's goal, Appendix 1, page 36. For the Carmans, that would not allow year-round catch and release, and might suggest other temporal or area constraints and procedures. 8. ARRIVE AT COOPERATIVE MANAGEMENT STRATEGY. We are asking that a better approach to managing the native brook trout of the Carmans River, specifically a program of no stocking, be arrived at through cooperative discussion and consensus initiated by the Department, to include all stakeholders —local anglers, fishing organizations, such as the local Trout Unlimited and trout-knowledgeable EBTJV; environmental organizations, such as Open Space Council; the Town of Brookhaven environmental department; and regulators and scientists from the Department and elsewhere. The goal would be to arrive at a consensus-endorsed program that honors the integrity of the resource (the trout and the river habitats) and the beneficiaries of a healthy river resource (anglers, students of icthyology and nature, and the community). For example, through formulating our comments from anglers of varying experience and geography, it has been revealed that, both here on Long Island and in other trout-fishing areas, the national administrators of angler organizations, where their principles and guidelines dictate no stocking in

native trout steams, have told local chapters in no uncertain terms that they must stop encouraging, demanding and pressuring their state oversight conservation agencies, such as the DEC, to stock such rivers. The local organizations often outright ignore their national body. We are requesting that the Department stop stocking above “C” gate as of this season, immediately, while a consensus-seeking forum proceeds. Because this plan is intentionally angler-driven and not science-driven, we would like to offer this quote from writer and trout fisherman Thomas McGuane in his foreword to ichthyologist Robert J. Behnke’s book, Trout and Salmon of North America: 4 Anglers are often activists for aquatic conservation, but their sometimes inadequate skills of discernment have not sufficiently guaranteed diversity…. Until biodiversity is made tangible, it can never be reckoned as cost. The expensive absurdity of “mitigation” as fish climb ladders, lose direction in reservoirs, ride barges around dams, and attempt to survive passage through turbines cannot be properly appreciated until the tragedy of lost stocks is understood. All salmon, all trout, are not the same. In that vein, we request that the Department acknowledge the uniqueness of the Carmans River and treat its wild native trout population, which has uniquely imprinted on the habitat, as it deserves in face of the extreme angler pressure to stock the river. We request that the Department acknowledge the fact that anglers have choices they can make; the fish do not. There are other streams nearby on Long Island where stocked fish can be caught, whose native wild brook trout populations and habitats have already been permanently tainted by the introduction of hatchery-raised brook trout, rainbows and brown trout, where the thrill of shooting fish in a barrel are offered every time there is a stock event, such as in the Connetquot and Nissequogue, rivers whose brook trout population may never recover. We are lucky to have a stream like the Carmans with heritage, hatchery-free brook trout and request that the Department do everything in its power to manage a stock-free experience for high-quality angler enjoyment. ADAPTABILITY IN THE PLAN We commend the State’s Cold Water Fisheries Unit on the adaptability goal of this Plan with the intent to change strategies as conditi55ons or new information become available or status in the river presents a new dynamic. Similarly, we are requesting, as above, a determination of current status of the Carmans wild native brook trout as base data to evaluate the result of halted stocking. EXCEPTIONS — We also applaud the Department’s indication for the need for “exceptions,” page 72. We are not exactly clear on the meaning of the chart, but we assume it is for exceptional situations since the Carmans is one of the listed. If ever there was a need for the exceptional, the Carmans is it. Thank you, once again, for the opportunity to respond. We look forward to your response to these eight comments and requests.

269) The New York City Department of Environmental Protection (NYCDEP) submits these comments in response to the New York State Department of Environmental Conservation’s (NYSDEC) proposed draft Fisheries Management Plan for Inland Trout Streams, published in the NYS Environmental Notice Bulletin on May 27, 2020. We fully support NYSDEC’s goals of managing New York's trout stream fisheries according to their ecological and recreational potential and expanding fishing opportunities for the state’s anglers. NYCDEP is responsible for the operation, maintenance and management of New York City’s water supply system, which provides more than 1 billion gallons of high-quality drinking water per day to more than 9.6 million New Yorkers. This water comes from nineteen reservoirs, three controlled lakes, and numerous tunnels and aqueducts, which extend across a nearly 2,000-squaremile watershed. The watershed is located upstate in portions of the Hudson Valley and Catskill Mountains that are as far as 125 miles north of the City. The Bureau of Water Supply’s overarching mission is to reliably deliver a sufficient quantity of high quality drinking water to New York City. Healthy aquatic plant, fish and animal communities are critical to sustaining high quality drinking water, and are key indicators of water quality and potential degradation of the surrounding watershed. Overall, NYCDEP finds the Plan to be a positive for the NYC watershed and for the state’s fisheries, especially for the wild fisheries in headwater tributaries. NYCDEP has the following specific recommendations: Esopus Creek as stocked-extended The Esopus is listed as a stocked-extended stream and is slated to receive the most stocked fish in the state. The value of stocking in such a large, heavily trafficked stream with regards to a put-and-take fishery is apparent, but impacts on wild genetic diversity, stream carrying capacity, and localized ecology may warrant

further examination. Stream conditions seem adequate to support naturalized populations and some local anglers and groups (anecdotally) report quality wild rainbow fishing as a primary driver for recreation in the area. Increasing the resurvey priority may help to assess impacts from increased stock introduction. Year-round Catch & Release Vincent Sapienza, P.E. Commissioner Paul V. Rush, P.E. Deputy Commissioner 71 Smith Avenue Kingston, New York 12401 Increased stocking in the Esopus may also lead to increased off-season pressure on the sensitive spawning areas of wild fish, especially just before trout season. Educational signage and tackle restrictions (i.e., fly only, single barbless hooks) in spawning areas may help to prevent deleterious effects. Thermal Refugia (Page 37) Rather than impose broad summer season closures at the expense of reduced fishing opportunity and angler judgment, NYSDEC has emphasized outreach and education to mitigate potential for harm. The designation of thermal refugia at the confluence of larger streams and cold-water tributaries along with a temporary (late August-September) moratorium on fishing in the immediate refuge area may help fish to avoid unnecessary stress due to crowding and angling during the hottest times of the year and in years of severe drought. NYCDEP is grateful for the opportunity to provide comments on this Fisheries Management Plan and appreciates NYSDEC's recognition of the criticality of watershed protection.

270) The Ausable River Association (AsRA) commends the New York State Department of Environmental Conservation for completing the draft Fisheries Management Plan for Inland Trout Streams in New York State (the Plan). We applaud the underlying purpose of "managing fisheries according to their ecological and recreational potential." We were pleased to see a number of our technical questions and comments from the public meetings addressed within the draft plan. Specifically, the inclusion of language in the plan that details the history of reach-level management, the process for reach determination, and the incorporation of the ability for a reach to be reclassified based on habitat improvement projects. Likewise, the process for determining reach classifications was comprehensively discussed.

Furthermore, the three wild classifications laid out in the Plan will provide substantial protections for wild populations of native brook trout across New York State and the habitat improvement structure introduced in the plan will be of great importance for improving habitat and water quality in many of these reaches. However, there are several areas where the Plan could be improved and one management action that concerns the Ausable River Association.

Characterization of Non-Native Introduced Fish Species and Impacts of Stocking Brook Trout

The Ausable River Association urges the DEC to recognize and discuss the impacts of introduced non-native salmonids (brown trout and rainbow trout) and domestic brook trout on native species and the aquatic food web of trout streams within New York State, especially with respect to climate change. The Plan excludes any discussion of the impacts of introduced, non-native salmonid species, even though the scientific literature clearly outlines that such impacts exist. Further, the Plan lacks discussion or special considerations when a stocked reach borders a wild-quality or wild-premier reach. First, we would like to request that DEC make a consideration or statement in the Plan about special considerations about post-stocking dispersal of fish, especially where wild-premier and stocked-extended overlap. Several studies provide evidence that stocked fish disperse geographically (Cresswell 1981, Helfrich & Kendall 1982) and genetically through

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interbreeding and introgression with wild populations (Bruce et al. 2019; Bruce & Wright, 2018; Laikre et al 2010). For example, could there be a buffer zone of a particular distance in the boundary areas between wild and stocked reaches? The creation of such a buffer would aid in mitigating impacts of climate change and warming water. We urge DEC to recognize research

showing evidence for impacts of nonnative species on native brook trout. The presence of brown trout and rainbow trout is often associated with the downstream distribution limit of brook trout (Vincent & Miller 1969; Gard & Flittner 1974; Kozel & Hubert 1989; Rahel & Hubert 1991; Petty et al. 2012), and the impact of these non-native trout species have been linked to declines in brook trout populations in numerous studies (Faush & White 1981; Moore et al. 1983; Waters 1983, 1999; Larson & Moore 1985; Magoulick & Wilzback 1998; McKenna et al. 2013; Wagner et al. 2013; Hoxmeier & Dieterman 2016). There are various mechanisms responsible for the decline in brook trout populations as the result of introduced rainbow trout and brown trout. Generally, they are linked to higher thermal tolerances of the introduced non-native species, displacement of brook trout from preferred resting positions, hybridization by redd superimposition, predation of juvenile brook trout, and preferred harvesting of brook trout by anglers when co-occurring with brown trout (Cooper 1952; Marshall & MacCrimmon 1970; Alexander 1977; Lee & Rinne 1980; Fausch & White 1981; Fausch 1989; Flebbe 1994; Eaton et al. 1995; Sorensen et al. 1995; Essington et al. 1998; Carlson et al. 2007; Cucherousset et al. 2008; Hartman & Cox 2008; Öhlund et al. 2008; Hoxmeier & Dieterman 2013; Chadwick et al. 2015). A recent study by Hitt et al. (2017) shows that brown trout affect brook trout use of foraging habitat outside of cold-water refugia. This has implications for the long-term adaptation of brook trout to climate change as it documents a possible mechanism by which the presence of brown trout limit the selective pressure on brook trout populations to adapt to warmer temperatures. Therefore, stocking brown trout in waters deemed too warm for brook trout may limit the foraging habitat for nearby brook trout populations (in reaches classified as Wild, Wild-Quality, and Wild-Premier) and limit the potential for future adaptation to warmer water temperatures. Another recent study (White et al 2020) suggest that brook trout in north central Pennsylvania utilize a mainstem river with only seasonally suitable brook trout habitat to disperse to distant tributaries for spawning, highlighting the importance of large rivers as movement corridors for brook trout populations in wild tributaries and river reaches. Maintaining ecological integrity of these habitats could be critical to maintain population connectivity, diversity, and gene flow.

We encourage the DEC to recognize and utilize the existing body of scientific knowledge detailing the impacts of non-native fish species on native fish populations. Specifically, DEC can aid the improvement of habitats to improve those areas deemed resilient to climate change. This knowledge should be incorporated into the management framework and be balanced against the public desire to fish for non-native species. To be clear, AsRA is not advocating the cessation of stocking non-native trout species. Rather, we urge DEC to recognize the threat these species pose to native fishes and carefully consider expanded stocking of non-native species, especially in areas where stocked reaches border the three wild stream classifications.

Catch and Release

We oppose the proposal to create a Catch and Release season statewide on all trout streams and classifications. While the description on the draft plan on page 23 and the further discussion and justification provided in Appendix I describe the reasoning for establishment of a catch and release, artificial lures only season from October 16 through March 31, the Ausable River Association does not feel that there is adequate evidence presented to support this statewide, and

would strongly suggest that this seasonal regulation only be applied to stocked and stocked-extended categories of management until more research and risk assessment can be completed. The only New York state stream data referenced in the Plan is from Regions 8 and 9. Therefore, without careful study of areas like the Adirondacks, Catskills, and Long Island, we feel that the evidence provided justifies a catch and release season from Oct 16 to Mar 31 in stocked reaches only. For the same reasons, wild reaches should be closed seasonally to show DEC support for promoting wild reproduction here and preventing unnecessary damage or mortality to spawning fish, redds, or emergent fry, as the Plan stated was the primary reason for management using

seasonal closures. This would align with the primary guiding principles of the plan to “always strive for self-sustaining populations with an emphasis toward native trout (brook trout) and managing trout stream reaches ‘according to their ecological potential”. The Ausable River Association strongly suggests the DEC consider only allowing year-round catch and release in reaches classified as Stocked and Stocked-Extended.

Trout Genetic Strains

Another of the guiding principles of the Plan is that, “Domestic trout strains will be stocked to support a fishery, not to establish new self-sustaining populations”. We applaud the DEC for making a consideration for wild brook trout by moving forward with the development of a sterile strain of domestic brook trout for stocking, but see it presented in the Plan as a lower priority than developing strains of brown trout and rainbow trout that are more suited for survival in the wild. Recent studies show genetic introgression of domestic and other stocked strains of brook trout with wild populations at relatively low levels (<30%) across the state, with the highest levels of introgression occurring in the Adirondacks (Bruce et al. 2019; Bruce & Wright 2018). This evidence illustrates the critical importance of creating a sterile domestic brook trout for stocking in trout streams statewide to aid in the conservation of native and heritage trout genetics. With this in mind, the Ausable River Association requests that DEC prioritize the creation of triploid (sterile) domestic and non-native trout species in advance of other strain improvements mentioned in the draft Plan. Specifically, in the plan on page 27, “If strain improvement strategies are successful in prolonging the survival of stocked domestic trout, then sterility would become an even more desirable feature in such circumstances”. The Ausable River Association recommends that creating sterile trout should be pursued first and foremost, or at least concurrently with the improvement of current strains of domestic brook trout, rainbow trout, and brown trout.

Species Composition
Species composition of stocking efforts is open to revision under this plan, but the current species composition was not listed in Appendix II. We suggest that the species composition be listed in the final Plan and that there be creation of an additional tool for the public to provide input on species composition of stocked reaches.

Norton Brook, Region 5, Essex County

The Ausable River Association requests that Norton Brook in Region 5 of Essex County be re-classified as Wild. Research underway at AsRA suggests that Norton Brook provides habitat for brook trout that is sufficient to sustain a self-reproducing population. This stream appears on page 50, Appendix II of the Plan, and is stocked with approximately 100 brown trout per year. Based on an environmental DNA study undertaken by the Ausable River Association and Paul Smiths College in 2018 and 2019 (Pershyn et al. 2020), no brown trout DNA were detected Norton Brook

in by early October. We detected brook trout DNA only and throughout the entire Norton Brook system. These data suggest that the brown trout stocked in this system do not persist for long, and thus we feel strongly that the DEC hatchery resources could be better allocated elsewhere. Further, the wet width of this stream is less than 10 feet in many places and provides ample habitat for wild brook trout above Route 73. The tributaries that flow in the East Branch of the Ausable River have been identified as important brook trout habitat by the Eastern Brook Trout Joint Venture, and have a high potential to maintain brook trout occupancy under future scenarios of climate warming. Instead of stocking a few fish into Norton Brook, we ask that DEC reallocate them to other appropriate Essex County streams in future years giving us the opportunity to continue and expand our research efforts to achieve our organizational goals and assist the DEC in our shared goals of stream protection and managing New York’s trout stream fisheries according to their ecological potential.

Education on Angling Ethics

Attendees at the November 2019 public meetings expressed interest in the mobile map application being used to communicate temporary fishery closures due to high temperatures. After DEC stated their capacity for creating temporary and emergency regulations is very difficult, the attendees then suggested providing outreach information within the app, specifically regarding invasive species alerts, education on preventing the transport of invasives, and voluntary suspension of fishing activities when water temperatures are too warm. In the draft Plan, on page 33, this is listed as a secondary outreach priority for the interactive angler map, and is reinforced by language on page 37, "…there will be circumstances that may tempt some anglers to exercise poor ethics. Similar temptations currently exist now to fish for thermally stressed trout during summer. Rather than impose broad summer season closures at the expense of reduced fishing opportunity and angler judgement, the DEC has emphasized outreach and education to mitigate potential for harm. A similar outreach and education strategy are warranted for the proposed catch and release season". The Ausable River Association applauds DEC for including this in the draft Plan and strongly supports this effort. Furthermore, AsRA suggests that DEC place an intensive outreach focus on refraining from trout fishing when water and air temperatures are stressful to fish. This is listed only as one bullet item on page 33 of the draft Plan, and we feel there is a very strong need for increased education from DEC and stakeholder groups. It is an elective behavior, but this ethical behavior will be spread only through public education efforts and self- policing. We are echoed by the Ausable River guiding community in this sentiment and we expect it would likely see great appreciation and support if DEC were able to incorporate this outreach and education into the interactive map, website, publications describing the new plan, the Conservationist, and as a special place in the annual syllabus of NYS fishing regulations. Currently in this publication, avoidance of trout fishing during periods of thermal stress is only briefly mentioned in the article about Catch and Release Fishing tips on page 65 (NY Freshwater Fishing Digest, April 2019, covering 2019-2020 regulations and useful information for New York anglers). Articles such as the special bulletin released in June 2019, (https://content.govdelivery.com/accounts/NYSDEC/bulletins/24e37db) would be much more educational on this topic. The Ausable River Association would deeply appreciate an opportunity to become involved in increased educational efforts for ethical angling in Region 5 or statewide.

We thank the DEC for the multiple years of effort put forth in creating the draft Fisheries Management Plan for Inland Trout Streams in New York State. Thank you also for your efforts to involve anglers and stakeholders across the state in this process, and for the opportunity to provide public comment.

272) We are in disagreement with the portion of the plan (pgs. 22 & 23) which pertains to year round fishing for trout.

This does not provide adequate protection for spawning trout which in our opinion goes against the mission of Trout Unlimited which is "to conserve, protect and restore North America's cold water foheries and their watersheds."

We do not want anglers to advertently or inadvertently disturb redds during the spawning periods.

We do not want breeding trout to be disturbed and vulnerable to criminal human harvest in the small, shallow tributaries where they spawn.

We are certain that the autumn priorities of deer hunting will preclude law enforcement of catch and release in the remote tributaries.

In order to sustain the economy of the people of the upper Delaware River region who depend on the fishing tourist trade, we hold that the spawning tributaries must remain protected, and that the trout require respite from the fishing pressure of the presently adequate April 1 to October 15 season.

273) As a former New York State fishing guide, and author of the Matt Davis Mystery Series (set in Roscoe, NY) I strongly object to the proposed changes to the trout regulations in your state. My main objection is to the proposed catch-and-release, artificial lures only season from Oct. 16 to March 31. This would essentially permit angling year round for trout, especially harmful during the time trout are spawning, and hopefully adding additional wild trout to your rivers' populations. Trout are especially vulnerable during this period, and subjecting them to harassment and being caught will certainly result in a decline in the wild trout population, not add to it.

It is my fervent hope that you and your department will reconsider this especially detrimental change in the trout regulations, and rethink your approach to increasing the wild trout population in your state's waters. Surely there is a better way. Please find it.

274) Amazing. A history lesson is needed at this time.

Rice Creek is a stream originating in the town of Granby, NY. It flows north to Lake Ontario near Oswego.

The first assault on this trout stream was the creation of a swamp at Fallbrook so SUNY students could study the stream. Surprise. The stream was forever changed by the ignorant change. No more lake spawning runs of suckers and large brown trout. Goodbye to those large snapping turtles.

The next assault was the re-introduction of the beavers. Goodbye cold water!

The final insult for me was the rubber stamp approval of Syracuse sand and gravel mine. A constant barrage of sand on one tributary actually led to the washing out of a culvert on the Bingham Rd in Granby. A fine was paid. A new culvert was installed. A permit was issued to allow continued damage to the stream without consequences.

Your seeking of input can only be a bureaucratic make work program. It is embarrassing to see the silliness of this management stunt.

If you really want trout streams hire lawyers. Make polluters pay in a retroactive way.

Drain the swamp at Fallbrook and let the water flow again. That stream will clean it’s self if it is given a chance.

And those beaver ponds? Eat more beaver!

275) Since we met at the old hideaway when the streams were all flooded and virtually unfishable, I have fished a couple of times a week regularly I have not caught one fish at any of the stocking sites. Kinderhook bridges heavy pressure- zip not one fish- but I am stubborn and determined thereby I have caught some trout almost all rainbows this year. Now the water is low and getting warm- I have to work hard to get trout.

"Trout stream plan"

It is difficult to say what is right way. I think the trout stocking program is good but would be much better if the stocking times and locations were spread out more.

276) Thank you for the opportunity to comment on the NYSDEC "Draft Fisheries Management Plan for Inland Trout Streams in New York State (FMP, Draft Plan)." This plan represents a great stride forward in the management of trout streams across the State of New York and provides many benefits for the Upper Delaware River (UDR). Friends of the Upper Delaware River (FUDR) is the only professionally staffed organization in the UDR watershed working every day to protect and restore this magnificent cold water ecosystem. Our mission is to protect and restore the Upper Delaware River watershed for the benefit of local economies, communities, people, and the environment. How the Plan will Improve the UDR Tailwater Fishery 1. As one of the finest wild trout fisheries in the United States, FUDR applauds the decision to designate the UDR Tailwaters as a "Wild-Premier" fishery. This designation will enhance the ability of anglers, conservation interests, and all watershed stakeholders to generate much needed resources to protect the long term viability of the fishery, the watershed, and neighboring communities that rely on a clean and healthy river for their livelihood. As competition for federal and state conservation funding increases, the "Wild-Premier" designation will help advocates and stakeholders better define the fishery and the watershed in the eyes of key decision makers. 2. FUDR strongly supports the NYSDEC Fisheries Bureau stated intention in the plan to prioritize wild trout populations through integrated habitat restoration goals while reducing reliance on hatchery fish and stocking. As a unique tailwater fishery that supports a healthy and thriving population of wild trout, it is imperative that a long term vision be adopted by New York State to maintain and improve the quality of the tailwater fishery through habitat restoration and a focus on protecting wild trout for future generations. 3. FUDR strongly supports the management goal of eliminating stocking of hatchery fish in the UDR tailwaters below the Cannonsville and Pepacton dams (with the exception of Oquaga Creek). As we understand the current stocking program, the NYSDEC stocks (and permits stocking) in the East Branch from the confluence with the Beaverkill River upstream to the Pepacton Dam in Downsville, NY. Anybody who regularly fishes that section of the Upper East Branch understands the high quality nature of that stream. Eliminating stocking will help ensure more viable populations of wild fish which we believe contributes to the health of the fishery and the quality of the wild trout fishing experience. 4. A commendable tenet of this plan is to simplify the management of New York's trout streams. FUDR believes one of the best examples of this effort to simplify for the UDR tailwaters is the reduction of the harvest limit to one fish per day throughout the entire tailwaters system on the East Branch, West Branch, and the main stem of the Delaware River below the Cannonsville and Pepacton reservoirs. This is a critically important new management policy to address the ever-increasing pressures on the UDR fishery. 5. FUDR strongly supports the grandfathering of existing catch and release and thermal refuge zones in the UDR tailwaters on the West Branch and Oquaga Creek and in the Beaverkill/Willowemoc system. When the NY/PA Joint Fisheries Investigation Plan (JFIP) is completed, we look forward to further discussions and exploration about the potential need to utilize new and expanded resource management tools like catch and release and thermal refuge zones and other creative mechanisms in the UDR tailwaters to ensure the long term protection and health of the fishery and the cold water ecosystem. Suggestions to Improve the Plan as it Impacts the UDR Tailwater Fishery While the plan contains several positive outcomes, there are

some items which we believe require further consideration and adjustment. 1. There is not sufficient evidence to support the implementation of a new “Catch and Release Season” from October 16 - March 31 in the UDR system. The data cited in the plan references fisheries which are substantially different from the highly unique UDR Tailwaters fishery due to the fishing pressure on this system that may not exist in the cited studies. Because of our proximity to New York City (NYC) and other nearby major metropolitan areas, the number of anglers that travel to the UDR tailwaters is much greater (and ever increasing) than the more remote fisheries noted. We believe this factor creates a high potential to negatively impact Brown Trout and Rainbow Trout spawning. Recommendations: • Retain existing special regulations in the East Branch and West Branch that prohibit angling to protect spawning beds. • Should the NYSDEC move forward with the new catch and release season in the UDR Tailwaters, data should be collected about the impact of anglers in spawning tributaries and the impacts on young of the year trout, and educational signage should be installed where Redds are found. 2. The UDR Tailwaters fishery is a high quality ecosystem that supports wild reproducing Brook, Rainbow, and Brown Trout populations due to a combination of factors including a continuous supply of cold water from New York City Delaware River Basin Reservoirs, prolific insect populations, tributaries which provide spawning habitat for Brown and Rainbow Trout, and cool headwaters streams which are necessary for the survival of Brook Trout. This is a highly unique combination of factors and it highlights the importance of thinking about the fishery at a watershed scale. It is important to note that the UDR tributaries support the high quality aquatic habitat of the “Wild-Premier” West Branch, East Branch, and Main Stem Delaware River. We are concerned that a default “Wild” classification for the tributaries does not consider that fish move throughout the entire system. It does not make sense that on the Main Stem you can only harvest one fish, but on a closely connected tributary you can harvest five. FUDR strongly believes that the tributaries supporting a “Wild-Premier” Trout fisheries are very important to their long term sustainability, and harvest limits there should reflect that relationship. Recommendation: • Unassessed/Unlisted Tributaries in “Wild-Premier” fisheries should automatically default to “Wild-Quality,” not “Wild.” 3. FUDR has been looking forward to the findings and outcomes of the ongoing work on the JFIP and the subsequent UDR Tailwaters Trout Fishery Management Plan (UDRTFMP) that will be developed based on the information generated by the investigation. The recommendations of the UDRTFMP should lead to refinement of the management strategies outlined in the FMP for the UDR Tailwaters wild trout fishery. In fact, there should be flexibility built into the FMP to account for the unique needs of all the highly specialized “Wild-Premier” fisheries throughout New York State. Recommendations: • The UDR Tailwaters are a highly unique fishery and should be managed as such. • Provisions for the refinement of management practices based on evidence and recommendations from Wild-Premier Trout Management Plans should be incorporated in the FMP. 4. Lordville is not the downstream terminus of the UDR wild trout fishery during a significant portion of the angling season. In the Spring and Fall, the cold water section of the main stem Delaware River often extends to Callicoon, NY where excellent fishing opportunities abound for wild brown and rainbow trout. Further, Callicoon Creek has been identified as a trout stream in the Draft Plan and it is a part of the UDR cold water fishery. From the perspective of harvest limits, It does not make sense to be able to harvest one fish on the upstream side of the Lordville Bridge and five fish on the downstream side when it is one continuous cold water fishery for a significant portion of the recreational angling season. Recommendation: • Extend the “Wild-Premier” designation on the main stem Delaware River Fishery downstream to Callicoon. 5. Upon plan implementation, Oquaga Creek will be the only stocked tributary in the UDR Tailwaters. FUDR believes that Oquaga Creek is a great candidate to invest in habitat restoration and other stream improvement efforts that will eventually lead to an upgrade in stream designation to a “Wild-Quality” tributary. The DEC has invested in access to this stream through Public Fishing Access (PFR) and parking areas. Trout Unlimited and FUDR have received grant funding to do

habitat restoration and stream improvement and we are committed to continuing this work. We suggest a conversation begin between the non-profit conservation organizations who are actively engaged in habitat restoration and the NYSDEC Fisheries Bureau immediately upon adoption of the statewide plan to explore this idea. Recommendation: • New York State Department of Environmental Conservation (NYSDEC) should prioritize Oquaga Creek for an upgrade from "Stocked" to "Wild-Quality." 6. FUDR, our conservation partners, and our angling constituency spend considerable time advocating for increased water releases from the NYC Delaware River Basin Reservoirs as a means of ensuring the health of the UDR tailwater fishery. While we recognize that the authority of the NYSDEC Fisheries Bureau does not extend to reservoir management in the UDR watershed, we believe there is considerable overlap and cross communication among and between the NYSDEC Division of Water and Fisheries staff. For years, FUDR's constituencies have struggled to understand the bureaucratic hierarchies at NYSDEC in Albany (and in the region) and how they interact and intersect with respect to management decisions over water allocations from the NYC Delaware River basin reservoirs. Confusion is further compounded with regard to communications with NYC and the other 1954 Supreme Court Decree Parties (PA, NJ, DE). Recommendation: • FUDR believes that the NYSDEC Fisheries Bureau in Albany and in the region should be more assertive in their intra-agency communications and with the Decree Parties with regard to water releases to the UDR tailwaters with the protection of the wild trout fishery as the paramount management objective and concern. We believe the leadership roles assumed by Fisheries Bureau staff on the Delaware River Basin Commission SubCommittee on Ecological Flows puts the Bureau is a far more favorable position to influence policy matters and management decisions with respect to the implementation of the Flexible Flow Management Program and daily decisions on reservoir management that have critical implications for the UDR wild trout fishery. 7. For many years, UDR anglers have noticed an increase in fish injuries suspected to be caused by the use of multi-point hooks. For that reason, FUDR strongly supports allowing only single point hooks. Recommendation: • When fishing on "Wild," "Wild-Quality," or "Wild-Premier" reaches, anglers may only use single point hooks. 8. FUDR has noted a number of likely improvements to the UDR fishery as an outcome of this proposed plan. However, there is an ongoing issue that can invalidate many of these changes in fisheries management, and that is the lack of enforcement. For example, reducing the harvest limit is a welcome change, but in the absence of enforcement, there may be no actual improvements to this fishery. Recommendations: • Explore ways to enhance enforcement through partnerships with conservation groups and anglers, etc. • Advocate for a more aggressive enforcement budget. Thank you for considering these comments. We look forward to seeing the final statewide plan and continuing to work with NYSDEC on the JFIP and subsequent UDR Tailwaters Fishery Management

277) For our Trout Power followers and fellow anglers across The State of New York; As many of you know, The NYSDEC opened the proposed Draft Fisheries Management Plan for Inland Trout Streams in NYS for public comment until June 25th. Following the conclusion of public comment and final edits, the plan will be utilized as guidelines for the NYSDEC's operations in regard to managing and protecting trout streams across the state. We're very proud to have Trout Power President, Jordan Ross acknowledged for his participation in the volunteer focus group. JP, backed by Trout Power research, offered his knowledge and thoughts, specifically for Adirondack brook trout management and the "Wild" categorized streams. The Board of Directors at Trout Power supports the draft plan proposed by the NYSDEC and would like to thank all involved for their thoughtful and tireless work to create the best fishing opportunities while still protecting our valued natural resources throughout The State of New York. The plan shares some of our core values of advocacy and stewardship of wild trout and particularly native brook trout. As a non-profit organization dedicated to protecting, restoring and enhancing native brook trout populations and their habitats, protection of our native trout is of paramount concern to Trout

Power. The “Wild” stream designations and “hands off approach to waters that are home to native brook trout is great forward progression. It is clear that our native brook trout were at the forefront of discussion as great thought and care went into the decisions made for their management. There is still time to review and respond with your constructive thoughts! Public comment is open until June 25th! Let your voice be heard whether it is good, bad or indifferent. We’re all striving for the same goal; enhancing and protecting our waters so they are the best that they can be!

[Comment numbering resumes at comment #300; no comments were omitted from this assessment.]

300) I am guide in the Catskills region and primarily on the Upper Delaware. I am sending you this in regards to my concerns with next years season closing regulations. Those fisheries are a gem, and one of the last amazing places on the east coast to catch and release wild trout. There is absolutely no reason to keep the season open passed October 15th with any benefit at all. These creatures have enough going against them already then to have people stomping on redds in the fall. One of the reasons that delaware has such great populations of fish is due to there spawning process being left untouched. Please please please throw this plan in the trash there is no need for it.

301) I had a chance to review the Inland Trout Fisheries Management Plan and basically support the direction that you are moving. As someone who is a fly fisher and lives in Western NY I primarily focused on the impact in this area but find no major concerns. I also took a close look at the Northern NY area as I previously lived in Clinton County and again have no concerns.

302) As a member of Trout Unlimited, I wanted to thank you for the hard work and effort on the Draft Fisheries Management Plan for Inland Trout Streams. The draft plan clearly shows an improved approach towards managing this important resource. There are several recommendations from the New York State Council of Trout Unlimited that I support and would ask to be considered. Specifically, this includes:

- Expanding management from reach scale to watershed scale to maximize habitat continuity and recovery of wild trout populations.
- Expanding protection and consideration of headwater streams as a critical link in the recovery and sustainability of native trout populations.
- Focus on the tributary benefits to achieving wild trout population recovery and increase tributary protection.
- Provide protection of wild and native trout during spawning through identification of spawning habitat and development of fishing season regulations designed to protect natural reproduction.
- Ensure that “stocked” or “stocked-extended” categories are appropriate within the watershed context.
- Consider watershed scale when planning, funding or prioritizing habitat restoration. Consider both private and public lands in the restoration strategy.
- Develop a monitoring and an adaptive management strategy to assess the effectiveness of management actions.
- Work between agency departments and bureaus within NYS DEC to identify and reduce the unintended hurdles to promote wild trout population recovery.

Please consider these important recommendations as you begin to finalize the plan. Thank you again for all your hard work.

303) Please consider special regulations on the Catskill rivers located in Delaware, Greene, Sullivan and Ulster counties.

As residents and anglers, we ask you to consider keeping fishing season closed during October 15-April 1 and to keep the current catch and release areas open year round.

Trout are special. The waters they reside in are special. The lands where the waters flow throughout are special.

This simple regulation will protect the wilderness and angling heritage that the Catskills is known for. Our wild lands and waters deserve special protection to continue the preservation of our reputation and resources. Our trout deserve time to spawn in quietude, away from the threat of anglers. Our waters deserve a rest to regenerate for the next season to come.

Keep trout season what it is- a special season to look forward to. A special time when Spring awakens the angler, local, and tourist to shake off the winter and rekindle their passion. Help local businesses gear up for the economic boom that happens from trout season.

Keep the tradition of the season opener alive!

The Catskills have wild land that is designated as state forest, forest preserve, wilderness area, and multi use recreation area. We ask NY DEC to practice responsible recreation and protect our Catskill rivers.

As Aldo Leopold stated, “Conservation is a state of harmony between men and land.” Please keep the harmony of these sacred trout waters intact.

304) This is a letter of strong support for the May 2020 Draft Fisheries Management Plan for Inland Trout Streams in New York State.

I am a New York State Fishing License holder, and have been for decades. I am a life scientist at the University of Rochester, and an engineer.

I am particularly enamored with the dual management approach, whereby some streams will be managed for wild trout, and others for stocked trout. The plan embraces the two different sets of stakeholders that define different needs in different types of NY fishermen. The needs of these two stakeholders have always been at odds in NY State, and I applaud a plan that addresses the different needs up front, and deals with them in a thoughtfully conceived manner. In concert with the proposed attention to habitat improvement, this plan is simply head and shoulders better than what we now have in place. It is a watershed change for trout management philosophy in NY State.

I have heard some concern in the sports community regarding the possibility that a 12-month season might prove damaging to trout populations because of the possibility of damaging redds. I do not share this concern. While it is clear that wading on redds is damaging to redds and fry (Roberts and White, 2001), as a trained life scientist I recognize that the health of a trout population in a stream depends upon much more than the health of any individual redds; the number of redds necessary to maintain population levels on a stream, the quantity of redds unreachable to wading fishermen, fishing pressure, weather, pollution, sportsman education to protect the habitat, the habitat itself, and many other factors all play a role. Despite extensive searching of the literature on my part, I fail to find clear evidence that a twelve month season will harm a fishery — the literature does not support the assumption that this management pathway will be harmful. Anecdotally, my local stream, Oatka Creek in western NY, has been managed successfully as a twelve month fishery for a long time. I believe a wild premier designation on a stream will promote good technique and habitat protection that will protect trout in the long run.

In summary, I strongly support this management plan. I do not believe the 12-month season will prove overly harmful to wild fish. This plan is much better than the plan currently in place, and should be adopted.

305) As a member of Trout Unlimited, I wanted to thank you for the hard work and effort on the Draft Fisheries Management Plan for Inland Trout Streams. The draft plan clearly shows an improved approach towards managing this important resource. There are several recommendations from the New York State Council of Trout Unlimited that I support and would ask to be considered. Specifically, this includes:

- Expanding management from reach scale to watershed scale to maximize habitat continuity and recovery of wild trout populations.
- Expanding protection and consideration of headwater streams as a critical link in the recovery and sustainability of native trout populations.
- Focus on the tributary benefits to achieving wild trout population recovery and increase tributary protection.
- Provide protection of wild and native trout during spawning through identification of spawning habitat and development of fishing season regulations designed to protect natural reproduction.
- Ensure that “stocked” or “stocked-extended” categories are appropriate within the watershed context.
- Consider watershed scale when planning, funding or prioritizing habitat restoration. Consider both private and public lands in the restoration strategy.
- Develop a monitoring and an adaptive management strategy to assess the effectiveness of management actions.
- Work between agency departments and bureaus within NYS DEC to identify and reduce the unintended hurdles to promote wild trout population recovery.

Please consider these important recommendations as you begin to finalize the plan. Thank you again for all your hard work.

306) I support the following regarding the Esopus Creek:

The stream should be classified as" Wild Quality" from the portal downstream to the Ashokan Reservoir.

The Stream should be classified "Wild" upstream from the portal to it's source.

307) As a member of Trout Unlimited, I wanted to thank you for the hard work and effort on the Draft Fisheries Management Plan for Inland Trout Streams. The draft plan clearly shows an improved approach towards managing this important resource. There are several recommendations from the New York State Council of Trout Unlimited that I support and would ask to be considered. Specifically, this includes:

- Expanding management from reach scale to watershed scale to maximize habitat continuity and recovery of wild trout populations.
- Expanding protection and consideration of headwater streams as a critical link in the recovery and sustainability of native trout populations.
- Focus on the tributary benefits to achieving wild trout population recovery and increase tributary protection.
- Provide protection of wild and native trout during spawning through identification of spawning habitat and development of fishing season regulations designed to protect natural reproduction.
- Ensure that “stocked” or “stocked-extended” categories are appropriate within the watershed context.
- Consider watershed scale when planning, funding or prioritizing habitat restoration. Consider both private and public lands in the restoration strategy.

• Develop a monitoring and an adaptive management strategy to assess the effectiveness of management actions.
• Work between agency departments and bureaus within NYS DEC to identify and reduce the unintended hurdles to promote wild trout population recovery.
Please consider these important recommendations as you begin to finalize the plan. Thank you again for all your hard work.

308) I've become dismayed somewhat by Trout Unlimited. While I love its work I'm disappointed that we have surrendered and given up on our state fish, Brook Trout, the only native species.
I understand Brook Trout require more stringent, clean, pure water…. That should be our goal. Not displacing them with imported brown and brook trout.

I am willing to volunteer at hatcheries, stream restoration, stream side planting for shade, etc. But unwilling to continue investing in invasive species no matter how much I enjoy them. Rainbow Trout should be a west coast phenomenon. Brook Trout a Northeast experience. In fact, we should work to restore their sea-run population.

309) As residents and anglers, we ask you to please consider special regulations on the Catskill rivers located in Delaware, Greene, Sullivan and Ulster counties. These regulations would keep fishing season closed during October 15-April 1 and keep the current catch and release areas open year round.

Trout are special. The waters they reside in are special. The lands through which these waters flow are special.

Allowing this simple regulation to stay in place will protect the wilderness and angling heritage that the Catskills are renowned for. Our wild lands and waters not only deserve, but require, special protection to continue the preservation of our reputation and resources. Our trout need time to spawn peacefully, without disruption from the activity of anglers. Our waters need a rest to regenerate for the next season to come.

Without the ability to recover from human activity during the summer months, the natural resources that make the Catskills so beloved to locals and tourists alike will disappear.

Keep trout season what it is: a special season to look forward to. A special time when spring awakens the angler, local and tourist to shake off the winter and rekindle their passion. Help local businesses gear up for the economic boom that happens because of trout season.

Keep the tradition of the season opener alive!

The Catskills have wild lands that are designated as state forests, forest preserves, wilderness areas and multi-use recreation areas. We ask NY DEC to practice responsible recreation and protect our Catskill rivers.

As Aldo Leopold stated, "Conservation is a state of harmony between men and land." Please keep the harmony of these sacred trout waters intact — for us today, and for generations to come.

310) I am writing in response to the request for public comments regarding the proposed changes in the management practices of New York State Trout Streams, specifically those affecting the Oatka Creek and Spring Creeks in Monroe and Livingston Counties in Western NY. I am an officer of a long standing fly-fishing club that owns over a mile of stream frontage on the Oatka Creek in Monroe Country and that also owns property on the Spring Creek in Livingston

County. We also have a close relationship with our neighboring landowners many of whom we lease from. These proposed changes will affect the lands that we own and manage. I am also writing to share my personal experiences and observations of over 35 years of fly-fishing those streams and to relate the experiences of continued discussions and conversations that I have with a vast variety of other anglers and also including some from the scientific community. Our collaborative goal is to share this experiential information to help assist in making the best policy decisions and to also advocate for improvements to our streams.

The one central theme of our collective experience is is that for many years both streams supported abundant and healthy wild trout populations. This facilitated both successful fishing along with well-balanced and diverse wildlife. They both were referred to as “Blue Ribbon Trout Streams”. As has been so well documented and confirmed this drastically changed with the onset of the polar vortexes is in the winters of 2014-15 and 2015-16 and the subsequent influx of large numbers of the common merganser. Documented studies showed that the mergansers cause major reductions to then existing trout population. Other suspected environmental concerns have been discussed as well. The fish population has not proven or shown to recover as previously was hoped. As fisherman, conservationist and advocates of environmental protection we are greatly concerned without significant stream and habitat improvements the proposed goals of maintaining these sections as wild trout streams will certainly fail to reach their desired outcomes. This generates several questions and concerns. The proposals mention “Placing greater emphasis on habitat improvement“. What specifically does this mean and what studies and plans are in place. Has there been a specific study to include the areas we own that would be affected by these changes? What are the available funding sources to make these improvements? Are water quality studies being done? Seemingly with out the current science data to support these changes they appear ideals based on the stream and environmental conditions as they once existed not as they currently stand. Additionally, I fully support maintaining all sections of streams that support wild trout populations as no kill, catch and release only. Gian Dodici, from the US Fish and Wildlife Department, who is recognized for his work in stream Improvements commented after observing both creeks that there is currently insufficient cover and protection for fish to escape from these highly successful and now established predators

As previously stated, our club members, many of whom would be considered excellent anglers have all reported seeing significant drops in fish populations as well as not seeing age class or size diversity. Most observed fish are in the size range that can avoid predation. In response we obtained a permit to stock quality hatchery raised fish in our section We only took this action to provide fishing opportunities to our members and to help maintain the viability of the club. We stocked as an expense to a club from 2016 through 2019 for the first times in recent history. We only did not stock this year to adhere to the Covid pause restrictions. Our members continue to see large numbers of common mergansers including breeding pairs and young. They also report seeing few were younger and smaller class of fish. This again raises serious concerns and points to the need for stream and habitat improvements. It is our hope that if the DEC impose regulations affecting our ability to manage and potentially stock the sections of the stream that we own they will support and partner with us, both with professional guidance and monetarily, to see that the necessary improvements are made to ensure these valued outcomes We await your answers to these questions and concerns and very much looking forward to working and partnering together to see these ideal efforts succeed.

311) Thank you for the opportunity to comment on the draft Fisheries Management Plan. I have been an avid recreational fisherman in New York State, primarily in the Catskills, for nearly two decades, and I have read the draft plan carefully.

I agree with the emphasis on creating and maintaining high-quality stream habitat, preserving and enhancing wild trout fisheries, and improving angler access.

I am nervous about the impact of a year-round catch and release season on wild trout reproduction. I am happy to see that the DEC is endeavoring to make science-based decisions. But I am sure that you realize that reasoning by analogy to other fisheries is still speculative. Please re-survey the Delaware tailwaters regularly to confirm whether trout reproduction and mortality are matching your current expectations, and be willing to adjust the plan accordingly.

Please consider implementing a sizable catch-and-release, artificials only section on the East Branch Delaware tailwater. You have categorized this fishery as Wild-Premier, and I agree! But the stream habitat is much poorer than the West Branch tailwater. In recent years I have regularly seen individuals harvesting the maximum daily limit, including many large wild trout. Their use of bait makes it much easier to harvest these fish. Please act to protect and enhance this special fishery.

312) The biggest problem with trout fishing in the Capital District, and I suspect many other areas, has become access to good water. 25 years ago, there was plenty of access to the Little Hoosick, Poestenkill, Quackenkill, and Kinderhook, but lately there's extensive posting, guiderail blocking of parking areas, various development, etc. The Little Hoosic seems to have much less water in it, as do some of the smaller Albany Co. streams – removed by wells? faster runoff due to land clearance? Quackenkill and parts of the Poestenkill apparently are not being stocked, many of the better stretches of the Kinderhook are not accessible. Perhaps some public rights could be acquired on the Waloomsac and more on the Kinderhook; maybe the latter could be regularly stocked farther downstream, and maybe the Schoharie farther down. I understand that parts of the Moordenerkill are accessible, but it's a small stream that can't handle much pressure.

On the plus side, the recent practice of stocking larger, if fewer, fish is good. Encouraging wild reproduction is good, but fails if the stream, such as the Little Hoosic, is deteriorating. (That was for many years my "home" stream.) Please do all possible to maintain the trout stream fishery, but also encourage pond fishing.

313) Thank you at the DEC for your work on the Trout Management Plan.

Overall I think it is a good upgrade but I want to make a few comments with regard to the local streams I fly fish, which is region 3, the streams of the Croton Watershed.

1. I would encourage you to put up signs regarding the new regulations.
2. I would like to limit the use of live bait and in particular ban the use of treble hooks.
3. I have some reservation about the streams open all year. Having a catch and release policy during the "off season" makes sense but we do get poachers and I fear some people coming up from New York City (and some locals) will clean out the streams. Hopefully this will not be a problem. One time last year and once this year I observed a DEC agent responding to a call of poaching on the East and West Branches of the Croton River. I know you are understaffed and I and other anglers really appreciate your responding to these situations.
4. Please consider stocking the Croton River East Branch from the East Branch Reservoir to the Diverting Reservoir with more fish as this is a very popular spot among anglers. It would make more sense to stock this "Stocked-Extended" part with more fish (the current plan calls for 1384 + 152) compared to the Croton River East Branch from Diverting Reservoir to the Muscoot Reservoir (current plan calls for 4984 + 552). Consider switching the two.

314) While I support the Draft Plan's emphasis on NY's wild trout and their habitat, I remain deeply concerned that, if implemented, the proposal to open the trout season during spawning season will negatively impact wild Brown and Brook Trout survival and reproduction, particularly in the Catskills. There is no doubt among scientists and fishermen that wading over redds results in increased mortality of trout eggs and fry, and fishing to spawners presents a strong threat to

successful reproduction and is inconsistent with the well established and uniquely historic sporting culture and ethics of trout fishing in the Catskills. One size does not fit all, and I urge NYSDEC to exempt the Catskills — particularly the Delaware, Beaverkill, and Willowemoc Rivers and their tributaries— from the proposal to open the trout season all year.

315) Regarding: Hooking and Handling Mortality

Question: Is there any data to be considered with use of barbless hooks in having a reduced hooking mortality?

Consideration: Could seasonal or select geographic locations benefit by implementing the strategy of barbless hook use? Thus potentially reducing Hooking and Handling Mortality. Minimally, please consider devoting a segment dedicated to the outreach and education strategy programs mentioned.

Regarding: Page 8 reference to “Scope of actions includes”

Consideration: Updating, modifying and reorganizing to a more user friendly database. PFR maps, stocking locations, public access locations, Ect.

316) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

317) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

The roll back of this protection has proved harmful to fish every time. Simple fact is most people do not know how to properly handle the fish. Please don't let our native trout go by the way of the striped bass.

318) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

319) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

320) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st. Trout are under too much pressure as it is and the closed months provide the necessary relief to give them a chance to mature.

321) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

322) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

323) With regard to the public comment invitation, I would like to make the following recommendation.
- Retain existing special regulations on the East and West Branch of the Delaware river that prohibit angling to protect spawning beds. Their should be no extention of the fishing season which could endanger spawning activities.
This is a very important recommendation that should be followed in oder to Maintain the reproduction of quality wild spring reared trout which will ensure The continuance of quality fishing.

- single hook regulation should be legislated in all wild fish and catch and release areas.

324) • The UDR Tailwaters are a highly unique New York fishery and should be managed as such.

- Unassessed/Unlisted tributaries of "Wild-Premier" reaches should automatically default to "Wild-Quality," not "Wild."
- The Statewide Plan should include provisions for the refinement of management practices based on evidence and recommendations from Wild-Premier Trout Management Plans.
- Retain existing special regulations in the East Branch and West Branch that prohibit angling to protect spawning beds.
- Fund a study to evaluate impacts of anglers in spawning tributaries and the impacts on young of the year trout.
- Fund the installation of educational signage where Redds are found.
- Extend the "Wild-Premier" designation on the main stem Delaware River Fishery downstream to Callicoon.
- New York State Department of Environmental Conservation (NYSDEC) should prioritize Oquaga Creek for an upgrade from "Stocked" to "Wild-Quality."
- FUDR believes that the NYSDEC Fisheries Bureau should be more assertive in their intra-agency communications and with the Decree Parties with regard to water releases to the UDR tailwaters with the protection of the wild trout fishery as the paramount management objective and concern.
- When fishing on "Wild," "Wild-Quality," or "Wild-Premier" reaches, anglers may only use single point hooks.
- The NYSDEC Fisheries Bureau should explore creative ways to enhance enforcement through diverse partnerships with conservation groups, anglers, landowners, and municipalities.
- The NYSDEC Fisheries Bureau should advocate for increased funding for improved enforcement in the NYSDEC budget.

325) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st." This time frame contains the most important part of the trout's life, it's reproductive cycle. Without the propagation of the species, there is no fishing at all

326) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

Would domesticated eagles represent this country, this land? Wild trout are no different. In these times wild trout are a miracle of nature. Just like bald eagles we have to care for the endangered. Why would we go backwards?

327) I'm writing to comment on the new Fisheries Management Plan. I fully support the recommendations of FUDR (attached). Further, the Upper Delaware system is a unique fishery in that it supports significant wild reproduction and much larger than average trout than can be found in our eastern rivers. As a result, it provides a major economic boost to a depressed region (through tourism). However, it is highly pressured by anglers, and simply cannot support the current harvest levels. Thus, the trout population is nowhere near what it could / should be (in my opinion, as someone who has fished the river for more than 20 years). There are plenty of 'put and take' fisheries in the state, and the UD's wild trout simply do not need to be harvested. Thus, I strongly urge you to consider making the entire system catch and release down to Callicoon. Not to rant, but the fishery protections in the Eastern US are inferior to those in the Western US, and this is an excellent opportunity to close that gap. Thank you for your consideration.

328) I am a fly fisherman and I like to fish all over this country, especially New York. Additionally, I feel fly fishing for trout is more of an art than just a sport. It is for that reason, I support regulations that protect wild and native trout. To ensure the native trout stay healthy and able to propagate please keep the trout fishing season closed between October 15th and April 1st."

329) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

330) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

Just say NO.

331) I am in agreement with suggestions submitted by the Friends of the Upper Delaware River organization in regards to implementation of a new wild trout management plan. Wild trout populations should be afforded the opportunity to thrive as they present very unique and special experiences to angle for them. It is very beneficial for the local economy as well. Thank you for accepting my comments in regards to this matter.

332) I am writing as a concerned yearly NY freshwater fishing license holder to give my comments regarding changes being considered on the trout season during this comment period. Please don't change it. As much as I'd love to have more time to fish for trout I believe we have to protect what NY has done such a good job at protecting all these years. I drive there because its better than NJ fishing. Despite the fact that you have that accolade and much knowledge please err on the side of caution and in the end not try to fix what certainly is not broken.

333) I am writing to indicate I am in favor of the new Fisheries Management Plan proposed by the NY-DEC.

Specifically, the new management regulations supporting the Upper Delaware Watershed will continue to make this world class fishery even better. This destination supports tremendous tourism which adds dollars to the local communities and continued improvement reducing creel limits will only add to the benefit. While I am a little concerned regarding year round fishing which could impact seasonal spawning, overall I believe the plan is a win-win!

Thank you for dedicating the time and resources to come up with a great overall plan.

334) As a member of Trout Unlimited, I wanted to thank you for the hard work and effort on the Draft Fisheries Management Plan for Inland Trout Streams. The draft plan clearly shows an improved approach towards managing this important resource. There are several recommendations from the New York State Council of Trout Unlimited that I support and would ask to be considered. Specifically, this includes:

- Expanding management from reach scale to watershed scale to maximize habitat continuity and recovery of wild trout populations.
- Expanding protection and consideration of headwater streams as a critical link in the recovery and sustainability of native trout populations.
- Focus on the tributary benefits to achieving wild trout population recovery and increase tributary protection.
- Provide protection of wild and native trout during spawning through identification of spawning habitat and development of fishing season regulations designed to protect natural reproduction.

- Ensure that “stocked” or “stocked-extended” categories are appropriate within the watershed context.
- Consider watershed scale when planning, funding or prioritizing habitat restoration. Consider both private and public lands in the restoration strategy.
- Develop a monitoring and an adaptive management strategy to assess the effectiveness of management actions.
- Work between agency departments and bureaus within NYS DEC to identify and reduce the unintended hurdles to promote wild trout population recovery.

Please consider these important recommendations as you begin to finalize the plan. Thank you again for all your hard work.

335) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

336) I am submitting this email as requested to comment on the proposed Trout Management Plan. For a little background on myself, since I'm sure the comments you are receiving get considered in context with who is submitting them/what demographic that person fits into within the state's angling base, I am 32 years old and have a small cabin on the west branch of the Delaware that my family has had for 25 years. I've worked on the river as a guide during my highschool/college years, fished the delaware, catskills, and throughout upstate New York for much of my life, and I flyfish exclusively now, though I'd like to emphasize that I spin fished as a kid and am by no means an elitist fly angler that seeks to push one sided elitist fly oriented policies for my self interest.

In reading the proposed plan, I have a few comments, but overall would first like to say I think you guys did a good job at explaining your objectives, what you are intending to do, and why. Well done.

As to my specific comments, I understand the dynamics at play here. Fly fishermen want certain things with some of them viewed as a bit extreme/exclusionary. It appears the goal in this new plan is to balance things by giving fly fisherman a couple very important things they want, in exchange for a few concessions to the general angling base that the fly fishing community overall probably does not support (such as year round open regs on certain waters). The year round open waters concept I think is great- and honestly opens up some opportunities that were not available on waters that were closed 9/15-october, but could still be fished in an ethical way and provided great opportunity (pre spawn fishing on upper east branch delaware above the res/same for upper wb above cannonsville/etc). I support that plan component as a fly fisherman and think people claiming trout redds are going to be raked, abuses will occur in large numbers is an overblown and inaccurate criticism. Most people don't want to fish the cold fall/winter months. It will be a small but dedicated angler base that enjoys this newly opened window.

One thing I think needs to be reconsidered is the 1 fish a day limit of any size on wild premier waters (i think I have the category right- basically the best wild trout waters in the state). I think a lot of concessions have been made here to promote general angling opportunities, and that in exchange, creating and extending catch and release regs on the best waters in the state is something that should be done. For one, its important to point out that there is a very apparent and known lack of enforcement on our upstate rivers. I haven't had my license checked in the catskills in 10 years and I fish 75 days a year up there. Understanding this, you basically have a situation where the angler base becomes the first line of enforcement, and then has to notify dec/dep what's going on to try and protect the rivers and their trout. If one fish can be kept on these rivers, abuses will happen. People take them to their truck, come back out and reload the stringer one at a time. There are already clear abuses that occur on the Delaware now with regards to catch and kill fishing regs. Setting a clear cut catch and release rule on the upper east branch (or at least certain high wild pop sections like corbett to harvard) and extending the catch

and release regs on the wb/main stem is vital to protect what is objectively the best wild trout river on the east coast. There are plenty of other rivers in the catskills with a mix of stocked/wild/ or all wild populations that can offer viable and legitimate alternatives to catch and kill anglers (upper eb from margaretville up/neversink from fallsburg to bridgeville, beaverkill,.willowemoc, etc). This river is a gem, and it needs to be more protected in a manner that allows the ANGLER BASE to know and police catch and release as a fishing community on these waters. The enforcement of 1 fish makes that more difficult, and to be clear there is NO enforcement.

Moving on to my second and final specific comment on the plan, the stocked sterile triploid proposal is a mistake in my opinion. For one, stocked rainbows do not assimilate in the wild as well as stocked browns do. Stocked browns on holdover rivers like hte beaverkill develop a nearly wild to mistakably wild look and behavior to them within one year of being in the stream. This allows for this and other rivers to have a quality holdover fishery, where quality fishing can be had and the fish are appreciated for their beauty/wild qualities. The triploid proposal sounds like something for a kids fishing derby, not a legitimate stocking policy. These fish (which ive caught) are as mutant and artificial looking as you can get- and totally unrewarding and satisfying for anyone to catch aside from the very entry/starting out angler. Is it really worth ruining a sustainable holdover fishery to address the few unfounded concerns of wild trout purists that play the genetics card on WILD/but not native trout? The wild browns we do have in this state are a direct result of stocked fish over the years, of many different strains amongst common species, successfully reproducing. Its not a real issue, and wild/holdover browns have happily coexisted in the catskills and upstate NY for years. Keep it that way to keep the stocked feel of these fish limited, and give them a chance to convert into holdover fish that perhaps one day contribute to the wild population there.

That is all and I apologize for the length of this but am passionate on the issues involved and wanted to give you my full take. Thank you for opening this to the public and feel free to email me back here if you have anything u wish to discuss, which I doubt.

337) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st. Except for the no kill / catch and release sections which I think should be expanded, and the Great lakes tributaries for fall run Browns and steel head which should also be catch and release

338) Though I have submitted comments previously, I would like to add one additional thought: I would like to see the Esopus Creek designated and maintained as a wild trout stream.

339) PLWASE KEEP THE RIVEWRS CLOSED FOR THE FISH I WISH THEY WERE ALL CATCH AND RELEASE ESPECIALLY THE NEVERSINK RIVER IN SULLIVAN COUNTY

340) I strongly oppose the opening of trout fishing to a year round schedule. Wild trout need the protection of the October 15th to April 1st closure. Catch and release fishing on certain rivers all year has been successful, although there are some trout lost to poor handling. Opening the trout season all year will certainly adversely impact the wild trout population and trout in waters which can support trout throughout the year. If the seasonal closure is eliminate, it should be limited to “put and take” waters and not waters that can sustain trout throughout the year.

341) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

342) Please classify the Esopus Creek as Wild. Also I would like to see more details on the catch and release regs, such as Barbless hooks only, otherwise what is the sense as removing barbed hooks will kill more fish when trying to release it. Make catching Rainbow Trout all catching and release on the Mighty E as so the wild population can thrive and future generations

have the opportunity to catch world class Rainbow Trout. I caught some beauties this past spring, 12”-19”

343) I have been a long time NY fisherman and am days away from becoming a waterfront land owner on a trout stream in NY. I'm happy to say there are many points I agreed with in your draft plan:

- wild trout are far more valuable than stocked trout;
- habitat protection is vital;
- a wild reach should not be stocked;
- and finally I support the proposed "winter-time" catch and release season.

Here are my other thoughts

I think the Upper Delaware River Tailwaters are truly special. As such, I support moving wild-premier (or at least the UDR tailwaters) to year round catch and release.

I think the Fisheries Bureau should be more assertive with regard to water releases to the UDR tailwaters with the protection of the wild trout fishery as the paramount management objective and concern.

I do not support 5/day on (wild) brookie streams, I'm sorry but no one needs to keep five 8" brookies. That's ridiculous. I understand that the science indicates that the impact is low due to little angling effort, but it's a bad look to have such a comparatively high limit on some of the state's most pristine trout streams filled with native trout.

I do not support stocking over wild trout. In any instance. I know the plan says a wild reach may not have stocked trout, that's good, but it also says a stocked reach may have wild trout. that doesn't work for me. It seems to me that adding stocked trout that compete for resources with wild trout will only serve to keep the wild trout beneath the limits of that reach becoming a wild or wild quality. Its sets up a self fulfilling feedback loop. Better in my mind to not stock anywhere there are wild trout, protect the habitat, and let nature take her course. (Worked pretty well for Montana.)

344) Overall I believe the plan will help improve trout fisheries in NY and the attendant inflows of revenue from tourism.

As a property owner in Delaware County, NY, I am particularly interested in the upper Delaware system. The upper Delaware system and its tributaries are an unparalleled resource in the eastern United States, rivaling and in many cases surpassing those out west. As such I feel it is imperative to manage the fisheries to generate interest among all generations. This will help engender an appreciation of the environmental resources while providing recreational opportunities and sustained tourism. I've made a few suggestions below which I anticipate would further enhance the value of the management plan you have developed.

- To assure sufficient spawning waters are protected as human population increases in the area, I recommend that any tributary of "Wild-Premier" reaches should automatically default to "Wild-Quality," not simply "Wild.
- In order to help protect the spawning population and increase the survival of released fish I suggest a) the season closure on East and West Branch of the Delaware which prohibit angling in order to protect spawning beds should be retained and b) prohibit the use of treble hooks during the catch and release season of October 16 through March 31.
- When fishing on "Wild," "Wild-Quality," or "Wild-Premier" reaches, anglers should only be allowed to use single point hooks year-round.

- Fund the installation of educational signage where Redds are found.
- Extend the "Wild-Premier" designation on the main stem Delaware River fishery downstream to Callicoon.
- The NYSDEC Fisheries Bureau should advocate for increased funding for improved enforcement in the NYSDEC budget.
- A contributing factor to declining recruitment of new trout anglers may be reduced angler access as landowners rescind permission to fish streams. I suggest that NYSDEC increase efforts with regard to land acquisition as land valuations will only continue to rise in the future. Perhaps the NYSDEC can identify mechanisms to leverage other organizations and entities to gain public fishing rights. Such as collaborating with the NYCDEC when the city purchases land to protect the watershed, or the Nature Conservancy to purchase lands that will protect riparian lands, or develop a process whereby landowners and anglers could help the NYSDEC identify available properties.

345) I support regulations to protect wild and native trout. Please keep the trout fishing closed October 15 to apr 1.

346) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

347) Our Watersheds are under incredible pressure and I an concerned with a few of the recommendations.

1) Year round fishing on streams with a WILD population will not allow protection for the Breeder fish during those critical times. (ie Brown Trout thru the late fall).
2) The Neversink Unique area is currently a catch N Release fishery, This area is under growing pressure and is feeling the impact.

Allowing a 1 fish per day Bag Limit will have a negative ripple affect, not just to the current stock, but the Spawning breeder population would be impacted.
I would ask you the fragile nature of our watershed be considered during the decision making process. As evidenced this year, the streams are being hit harder each year by thermal impacts, lack of snow and frost in the mountains. These water conditions need to weigh in on our decision making. The trouts chance of survival is being challenged by the environment, we need to balance our desire to have a longer season with the aggregate impacts on our fisheries.

348) "I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st."

We must protect species such as Brown Trout and especially native Brook Trout that spawn in the fall. I see absolutely no reason to change the regulations. If you do, you run the risk of losing these species as we've lost so many other species on this planet.

349) When considering next year's stocking program [on Esopus Creek], please consider reducing or eliminating the stocking of Brown trout. As a regular fly fisherman on the Esopus, I have noticed what appears to be a marked uptick of healthy and larger size Rainbow trout this season. With just a bit of help, the Esopus might very well be in the condition to become a great Rainbow trout fishery.

350) I have had the pleasure of fishing New York's trout streams for more than 50 years, starting on the Beaverkill as a teen and eventually graduating to the Delaware below Hancock. Just a note to beg you not to extend the trout season beyond it's usual closure dates of mid-October till April 1st. We love the upper Delaware because it presents the challenge of wild trout, between the parade of drift boats. Also, may I urge you to con sider greatly increasing the catch

and release requirement to the entire Delaware region, above Hancock. Trout are too valuable to be caught once, especially if they end up in a creel. My dream is that some time after I'm long gone, one of my grandchildren will shoot out a spey cast and hook a wild Delaware trout.

351) Please keep the regulation the way it is now. Keep it closed from Oct.15 until April 1st. I have been fishing NYS since 1954 and have no problem with the closed months. Keep the no kill open all year but the kill sections should be closed for trout fishing.

352) I have read the Trout Stream Management Plan. I have listed areas were there can be improvement.

The present closure for spawning should be continued on the Upper West Branch and Upper East Branch. Theses reaches of water receiver enormous pressure and the fish are scarred from multiple catch and release. Opening these area will only increase the problem.

Retain existing special regs on east and West Branches

All tackle requirements should include the use of a single hook (barbless should be considered).

Unlisted tribs should default to Wild Quality

Extend Wild Quality designation from Lordville to Callicoon.

Parties should enhance and better coordinate on cold water releases as this is the best conservation for the system.

If April 15 is the "end of spawning" why does catch and release end April1?

353) Here are a couple thoughts concerning the DEC's inland trout management draft plan. Not the last word, and not perfect, but to the core of what i believe. These are my own -not MHTU's position - and "broad brush," not Dutchess County, but statewide in perspective.

I would like to see a reallocation of DEC resources, to better balance stocked/put and take, and special reg/wild trout fishing opportunities for NYS anglers.

If designated reaches of streams throughout NYS will be "unstocked," and managed to sustain wild trout populations, then we need to: a. protect the fish with special regs, b: assess to make sure there is no habitat degradation, c: implement proactive habitat preservation and restoration where it makes sense, and d: establish a meaningful, measureable goal for wild trout stream reaches and monitor progress toward goals.

FYI, DEC has classified a couple stretches of Dutchess streams as "wild."
https://www.dec.ny.gov/outdoor/111015.html
realize that resources are constrained. But i think the DEC can and must do better at encouraging, no, soliciting partner agencies and organizations to collaborate, thus sharing the burden.

We are at a crossroads. We have a tremendous opportunity here and now to shape the future of inland trout fishing. Other states-- look at PA for example-- have successfully implemented plans that provide quality angling for trout -- stocked, and wild.

IMO NYS needs to refocus. Not calling for an end to stocking, but rather, a rebalancing to wisely manage our fisheries to preserve and protect dwindling wild trout opportunities.

354) I'm writing to voice my concern about the rule change allowing an extended catch and release season during the fall and spring trout spawning season particularly on streams and rivers designated as "wild premier". While it is a fact that not all trout participate in the spawn, the ones that do could be targeted indiscriminately by unscrupulous anglers who might then post pictures on social media amplifying the potential damage that might result from targeting large spawners. Perhaps the DEC could consider opening a single such river as a test case before opening all "wild premier" rivers to an open season.

355) I appreciate the DEC's work on updating statewide trout stream management. I agree with the Ashokan-Pepacton Watershed Chapter of Trout Unlimited that Esopus Creek should be managed as Wild-Quality from the Portal to Ashokan Reservoir, and Wild from the Portal to its source. The Esopus is famous for its wild rainbow trout. I've never understood why the DEC bothers stocking browns in it at all.

356) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

357) It is my opinion over decades of personal experience as a concerned sportsman and dedicated fly fisherman, that the identification status of Esopus Creek from its source off County Rt 47 in the Big Indian Wilderness Area to the Chimney Hole where the Esopus feeds the Ashokan Reservoir needs to be identified as a Wild Trout Fishery, and thereby benefit from the necessary regulations and restrictions it deserves (e.g., artificials only, 2 fish creel limit & size minimum 12 inches - daily).

I personally have been fly fishing the Esopus Creek for almost 40 years now. I remember the days of the long fabled spring spawning runs of Rainbow Trout migration out of Ashokan Reservoir and upstream into the Esopus to spawn. I remember Rainbow Trout in the 5 to 10 lb. range, possible. I remember by the DEC's own studies indicating the Esopus Creek Rainbow Trout population estimates of 2,000 Rainbow Trout per square mile.

I also remember the devastating January Thaw Rain Storm in 1995, that inflicted so much damage on the Esopus and the fishery. But, within a couple of years from that time, the Rainbow Trout fishery began to make a comeback, where catching and releasing 12 to 15 inch Rainbows were again common. Then, in the early 2000's the real devastation came, with the NYC DEP Repair work on the Schoharie Dam, continuous releases of chocolate clay colored water flowed from the Shandanken Portal non-stop. That red clay water covered the freestone bottom of the Esopus for years, literally, destroying the natural Rainbow Trout hatchery. I remember one week, I had two different DEC Interns come up to me wanting to know how many "Brown" trout I caught, and all I could do was shake my head in dismay, remembering the Rainbow Spawning run days from decades earlier. It was obvious, the Rainbow was no longer considered - King. Then came, Hurricane Irene, then Sandy; this on top of the devastating red clay water. Then came the rock snot (Didymo). It seemed sadly, the Esopus was beyond return.

The good news is, over the past two to three years with the completion of the Schoharie Dam repair, and renewed clear, cold water returning to the Shandanken Portal outflow, the Rainbow Trout are coming back!! Initially, they started out small in size, six to ten inches, but recently over the past two years, the rainbow trout size has been on average twelve to thirteen inches or better. It has been a great development.

Not to ignore the other trout, but there are plenty of Wild Brown Trout in the Esopus, as well. The Brown Trout also having their own Fall Spawning run from the Ashokan up into the Esopus. However, the Rainbow Trout are a little more sensitive to water quality and the environment.

I have experienced the Esopus Fishery at the tale end of its hay day. I have witnessed its outright destruction and neglect. We are now watching with high hopes for a comeback.

I was fishing below the Five Arches Bridge one September afternoon, many years ago. I had a size 14 Blue Wing Olive on my tippet, as I made my final (3rd) cast, just above a boulder, a 15 inch rainbow took the fly before it even hit the water. This fish was not the largest fish in the world, but he will always be my most memorable.

Our future generations, need to have these experiences, too. We need to protect and preserve the Esopus Creek fishery for the future.

Stocked Trout has it risks with whirling disease and other hatchery concerns. The Esopus Creek truly is and historically has been a wild trout fishery, which deserves the classification and protections, far greater than "put and take" waters.

358) have been fishing in New York State for over 60 years. My grandfather took me fishing when I was very little. Indeed, I do not remember a year in which I did not go fishing.

Closed seasons have been used as a key conservation tool for generations, with great success, allowing generations of New Yorkers and visitors to enjoy fishing for many species of fish. Please do not change that policy.

I support regulations that protect wild and native trout.

Please keep the trout fishing season closed between October 15th and April 1st.

Do this to allow future generations to share the valuable fishing resources of New York. A longer season would result in significantly lower quality experiences and significantly higher costs since that would increase the pressure to stock additional fish. Ample evidence exists to show that reliance on stocking damages the quality of the fish and of the fishing experience.

359) I would like to recommend Trout Habitat Stamps to fund habitat work and create awareness. I'm against year-round open seasons and think that the Beaverkill and Willowemoc should be C&R only (i.e. extend the existing No Kills). Some other points I want to raise:

- C&R of all wild fish in stocked streams
- C&R of all wild Brook Trout
- Concerned with loss of artificial only and daily limits on Amawalk Outlet, Croton East Branch Reservoir to Diverting Reservoir, and Mongaup River below Rio Dam

360) I am writing to express how much I agree with the response made by [name redacted] of Ashokan-Pepacton Watershed Chapter of Trout Unlimited with regards to DEC trout management plan for the Esopus Creek.

As an avid visitor to the Esopus and it's tributaries for the purpose of fly fishing my absolute preference will always be to catch wild fish and a decrease in stocked fish would increase the time I spend on the River and in local hotels and restaurants.

361) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

362) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st."

363) I'm a NJ resident who has bought a NY state fishing license with trout stamp for the last 28 years in a row and I spend countless hours on NY trout streams mostly due its fishing quality and population of wild trout. Last year I spent 95 days on the water!!! Most wild trout habitat is quite properly protected by current regulations prohibiting fishing in most streams that are trout spawning habitats throughout NY, during spawning season, by closing all fishing. I agree with keeping it as is, with one exception: Add more "No Kill" regulations on water you're considering opening up to year round fishing.

NY has the best fly fishing water all throughout the state anywhere east of the Mississippi. Protecting the quality of the fishery is directly related to protecting spawning habitat.

364) I love and respect your state and it's natural beauty. "I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st."

365) "I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st."

366) I support the proposal set forth by Friends of the Upper Delaware with the exception of the "single hook" stipulation. This is an indirect but clear push to ensure Fly Fishing only. Again, I do not support this stipulation.

367) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

368) I love the new plan and am extremely impressed that NYS DEC is taking the initiative to get back wild trout streams. I also encourage a massive increase in education on modern catch and release practices as most folks (guides included) are grossly behind the times.

369) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

370) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between october 15 and april 1. Thank you

371) I support regulations that protect wild and native trout. Please keep trout fishing closed from October 15 - April 1 each year.

372) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

373) This correspondence is in response the DEC seeking people's impressions on how they could best improve the fishing on Oatka and Spring Creek in Monroe County. I have been an avid fly fisherman since the age of 12 and have enjoyed the fishing on both Oatka and Spring Creek for the last 40 something years. For the last 25 years I have ran a fly-tying and guiding business to service local anglers and wholesale flies to the Catskill Region. I have been a licensed NYS fishing guide #2514 for the last 23 years. Our family has lived on the banks for Caledonia's Spring Brook 900 section for 23 years. Also have participated in planning meetings regarding how to improve the fishing on Oatka and Spring Brook and all stream improvement projects on Oatka Creek. Obviously, I am very invested in the local trout fishing and am determined to get Spring Brook to return to its original status as a productive wild trout fishery.

Only recently did I see any variation of the wild trout populations as all this this changed in the 2014- 2015 year. The regression was dramatic as Spring Brook went from tremendous fish

populations to literally no fish overnight which most everyone attributed to the flocks of Mergansers that hit our area over those harsh winters of 2014/2015 and again on 2015/2016. I also work for the Bungalow fishing club which is just below the 900 section and their water was severely impacted at the same time. I understand the Mergansers were a factor but I also suspect the water quality and generally poor stream conditions are major factors as a great deal of spawning habitat has been lose. The decrease of the fish populations on Oatka is related to the deterioration of Spring Brook as the best water on Oatka is below the junction of Spring Brook down to the town of Scottsville. Without Spring Brook's cold water Oatka would have been at best a put and take fishery. There is more going on with the fishery besides Merganser ducks. Spring Brook has never had any advocacy and it is time for a change. It needs stream improvements.

Spring Brook suggestions

#1. The flows of Spring Brook above the hatchery have been impacted which has resulted in few or no fish on the Garbutt Club water and the flows leading down to the hatchery. The Garbutt Club's issues do impact the entire fishery as their flows have backed up and now form a backwater that was never there until about 15 years ago. Siltation is now a major problem. Some type of berm or other barrier needs to be placed on their water to speed up the flows so again the water downstream and the walk-in fishing area will again hold fish. Due to the increased water temps from standing water on the Garbutt Club the insect life has been impacted and weed growth is now year-round where in years past there were many open areas where the fish could spawn. The bank to bank weed growth continues down to the section above the hatchery. If the flows on the Garbutt Club water were increased with a berm the bottom would be cleaned out and there would be open areas for spawning. Increasing the flows on the Garbutt Club water would eventually lead to a return of the quality fishing just above the hatchery and the 900.

#2. To protect the now limited trout population I would like to see the entire length of Spring Brook to be no kill. Granted few fishermen keep fish but being that I l live the 900 I did see fisherman keeping trout when the populations were strong.

#3. The 900 needs stream improvements. Being that I work for the club below the 900 I know simple solutions to create more obstruction which would create more flow and or churning which in turn would result in better habitat for wild trout. I have participated in meetings regarding Spring Brook but due to the virus we seem to be at a standstill. Our group even did a walk through with invested Trout Unlimited members, Garbutt Club members and a stream specialist (Jan not sure of his last name) from the DEC and many recommendations were made by the specialist were made but so far none have been implemented. Really would like to see another meeting where we could first focus on the Garbutt Club flows and how to effectively restrict them plus start a work party for the 900 Section of Spring Brook which is in such a state of disrepair. I would be glad to show anyone from the DEC how the Bungalow Club has created structure which results in better habitat for the trout. Due to our efforts the Bungalow water now has a very healthily wild trout population yet the 900 section is still way down in its trout population though it has improved. Being that I live on the 900 I am sure I could arrange for work parties to use our side of the property. I know the DEC stream specialist (Jan) wrote a report on how to best improve Spring Brook and sure DEC staff could access that report. Would love to see his suggestions put into action.

#4. I would hate to see Spring Brook stocked. Mixing the inferior genetics of stocked trout with the remaining wild population would be a mistake for obvious reasons.

#5. The Spring Brook section at Mill St also needs attention as when the new bridge was built the flows now are going into the island which was never the case. Creating some type of berm on the left-hand side (facing downstream) which could be easily resolved with a berm and access is

easy. Concentrating the flows at the bridge would be a great benefit and would eventually force all the silt to dissipate.

Oatka Creek Suggestions

#1. Regarding Oatka Creek I wish it would stay no kill and no stocking. Would love to see the stocking cease bellow the junction of Oatka and Spring Brook as when the fishery was healthy there was no need to stock.

#2. I am a Garbutt Club member and really feel that section their section is rebounding and was pleased when they could not stock it this year. I know they have to have some type of DEC issued permit to stock and would love to see no more stocking on the Garbutt Club water.

Thanks for allowing me to provide feedback and would be more than willing to sit in on any meetings regarding the local streams.

374) I greatly appreciate and support any policies under consideration that enhance protection of the existing trout ecosystem as well as enhancing future habitat restoration and improvement efforts, including:

1.Establishing the Upper Delaware System as "Wild Premier". I would also love to see this designation extend all the way to Callicoon. Additionally, implementation of cold water releases designed to limit thermal stress, preferably down to Callicoon, if possible. This would be a great benefit to the existing wild trout ecosystem as well as potentially enlarging the total habitat area that would support these wild trout. This would of course have secondary economic benefits as well.

2. Discontinuing the practice of stocking trout in the East Branch and any of the tributaries of the upper Delaware system. Protection of the "wild trout" fishery seems to be better served by "not stocking" vs stocking . Additionally, I support no fishing over spawning fish in tributaries. Targeting reproducing fish seems destructive to the ecosystem that we are otherwise trying to maintain, improve and protect.

3. Decreasing to "one trout in possession, per day, for the entire system", to include the West Branch, the East Branch and the Mainstem. And also restricting fishing tackle to "single hook only".

375) I'm in complete and total agreement with comments presented by Clearwater Trout Unlimited as well as the Home Rivers Initiative. I'm encouraged to see the emphasis on wild trout and habitat improvements over stocking, the efforts of your team in these areas are commendable.

As a regular on the Delaware system, I see a pressing need to protect and improve access to the river be it existing or informal. Landlocked access on the Lower East Branch and a general lack of formal PFR on the West Branch have concentrated anglers and created conflicts with the commercial interests on the river. While initially intended as a starting point for guides floating the upper river, the recently constructed ramp known as "Barking Dog" in Deposit has become a take out. This has allowed guides to float the uppermost section of the river in huge numbers creating conflicts with wading anglers in what is some of the only water accessible through actual Public Fishing Rights. As commercial interests along the river continue to grow, additional formal access for wading anglers along the WB and upper Main Stem is sorely needed.

In addition to the need for increased access, improvements to existing access sites are needed. Overflowing parking areas have become common with municipalities responding by restricting on

street parking of any kind. Parking lots need improvements. Many trails to the river have been damaged over the years by floods, overuse and Japanese Knotweed. Perhaps this is an area where local conservation organizations such as Trout Unlimited and others can assist.

In closing, I'd like to extend my appreciation to everyone within NYS DEC who has worked on this initiative. Change is hard and requires total commitment. As a passionate NYS angler it is very encouraging to see the direction that the management of cold water fisheries is headed.

376) As a member of Trout Unlimited I have a serious interest in protecting and maintaining wild and native trout populations.

I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

377) As a member of Trout Unlimited, I wanted to thank you for the hard work and effort on the Draft Fisheries Management Plan for Inland Trout Streams. The draft plan clearly shows an improved approach towards managing this important resource. There are several recommendations from the New York State Council of Trout Unlimited that I support and would ask to be considered. Specifically, this includes:
• Expanding management from reach scale to watershed scale to maximize habitat continuity and recovery of wild trout populations.
• Expanding protection and consideration of headwater streams as a critical link in the recovery and sustainability of native trout populations.
• Focus on the tributary benefits to achieving wild trout population recovery and increase tributary protection.
• Provide protection of wild and native trout during spawning through identification of spawning habitat and development of fishing season regulations designed to protect natural reproduction.
• Ensure that “stocked” or “stocked-extended” categories are appropriate within the watershed context.
• Consider watershed scale when planning, funding or prioritizing habitat restoration. Consider both private and public lands in the restoration strategy.
• Develop a monitoring and an adaptive management strategy to assess the effectiveness of management actions.
• Work between agency departments and bureaus within NYS DEC to identify and reduce the unintended hurdles to promote wild trout population recovery.
Please consider these important recommendations as you begin to finalize the plan. Thank you again for all your hard work.

378) White Creek in Washington County, formerly a rich trout stream, has significantly deteriorated. Though I am usually sceptical of stocking, temporarily stocking White Creek with brook trout might be a good remedial measure while working to restore habitat on the stream.

379) I hope this finds you well. I'm reaching out regarding an extremely important issue — one that affects those who both care about and profit from the natural beauty and culture of the New York Catskill region. You, along with others in the NYS DEC, have the power to protect this region and its interests, now and for generations to come.

As residents and anglers, we ask you to please consider special regulations on the Catskill rivers located in Delaware, Greene, Sullivan and Ulster counties. These regulations would keep fishing season closed during October 15-April 1 and keep the current catch and release areas open year round.

Trout are special. The waters they reside in are special. The lands through which these waters flow are special.

Allowing this simple regulation to stay in place will protect the wilderness and angling heritage that the Catskills are renowned for. Our wild lands and waters not only deserve, but require, special protection to continue the preservation of our reputation and resources. Our trout need time to spawn peacefully, without disruption from the activity of anglers. Our waters need a rest to regenerate for the next season to come.

Without the ability to recover from human activity during the summer months, the natural resources that make the Catskills so beloved to locals and tourists alike will disappear.

Keep trout season what it is: a special season to look forward to. A special time when spring awakens the angler, local and tourist to shake off the winter and rekindle their passion. Help local businesses gear up for the economic boom that happens because of trout season.

Keep the tradition of the season opener alive!

The Catskills have wild lands that are designated as state forests, forest preserves, wilderness areas and multi-use recreation areas. We ask NY DEC to practice responsible recreation and protect our Catskill rivers.

As Aldo Leopold stated, “Conservation is a state of harmony between men and land.” Please keep the harmony of these sacred trout waters intact — for us today, and for generations to come.

I would like to close by saying this: for those of us who live in the Catskills, grew up here, visited during summers, made cherished memories among these mountains and streams, and for those whose livelihoods depend upon the safety and well-being of a healthy ecosystem and a fly fishing-centric tourism culture, the decision that will be made on this issue is critically important.

I know I speak on behalf of all of us when I say that we urge you, our government officials — who have dedicated your careers to preserving and protecting the environment — to take your responsibility into consideration as you make a decision that, we hope, is best for the Catskill region.

380) I am writing on behalf of Native Fish Coalition to express our general support for the Draft Fisheries Management Plan for Inland Trout Streams in New York, but also to convey some concerns relative to wild native brook trout.

Native Fish Coalition (NFC) is a non-profit conservation organization whose mission is to protect, preserve and restore wild native fish. We are a 501(c)(3) national organization with a Board of Directors and Advisory Council and members, partners, volunteers, and chapters in ME, NH, VT, and MA. Wild brook trout are a focal species for NFC throughout their native range.

Brook trout are native to New York and are the official State Fish. Once widespread throughout the state from the Adirondacks to Long Island, only 5% of watersheds that historically contained brook trout in streams and rivers are considered “intact” and at least 61% have been reduced, greatly reduced or extirpated (Eastern Brook Trout Joint Venture). It is critical that New York fisheries managers prioritize protection of the state’s last wild native brook trout.

New York’s wild native brook trout populations have suffered due to habitat loss, warming water, nonnative fish introductions, intra- and inter-species stocking, and angler exploitation. The Plan does a good job of limiting stocking by identifying it as “an inappropriate management strategy” for all three tiers of Wild designated streams. However, we believe the Plan does not adequately protect wild native brook trout from angler exploitation.

Instituting a bag limit of five fish in “Wild” designated streams is excessive and unnecessary, especially when compared to the lower bag limits on “Wild-Quality” and “Wild-Premier” streams. Because these “Wild” streams are mostly small headwater streams in the Catskill and Adirondack regions where wild native brook trout are present, the Plan is by default offering more protection to nonnative brown and rainbow trout than to native brook trout. NFC believes wild native brook trout should receive at least as much protection as wild nonnative and stocked fish, and ideally more.

NFC also does not agree that angler harvest is a non-issue due to reduced populations which are more susceptible to catastrophic failure, wherein overharvest can result in low levels of genetic diversity, etc. While the Plan states that catch and release has "little biological impact at the low levels of fishing pressure that these [streams] typically experience," we feel strongly that an angler determined to keep his or her limit day after day can have a significant negative impact on a small stream population in a short time. We have seen this firsthand on streams in Maine, New Hampshire, and Massachusetts. Implying that harvest is compensatory mortality as opposed to additive mortality has not been scientifically substantiated on these types of streams. We also challenge the reference to Vermont’s 12-fish limit on brook trout as being sustainable and justification for the relatively high bag limit on Wild streams in New York. The 2017 study by Vermont Fish and Wildlife Department of wild brook trout populations in streams that touted their “long-term resilience” (Kirn 2017) covered a period of 50 years during which time the regulations remained the same, and in fact had already been in place for close to fifteen years. We should not expect a change in the population if the regulations did not change. Baselines were established after populations were being exploited, and do not reflect historic abundance. The study also ignored large streams, rivers, lakes, and ponds, most of which have lost their wild native brook trout.

381) I want to thank you all for taking so much time in making up a new trout management plan and hope you're enjoying all the input now from anglers!

My two thoughts:

- I live in a fragile brook trout fishery. I see browns encroaching on their waters everyday (I just caught a brown nearly all the way up to Diamond Notch Falls yesterday!). I think any further stress on brookies would be a very bad idea. So PLEASE do not extend the season to be year round. In the seven years I've been living up here I've seen the interest in fishing tribs like this explode. There is so much pressure on these fish as is. Let's let the brookies rest!

- I also want to echo the thoughts of Trout Unlimited. Let's let the Esopus stay wild!

382) I am a resident of Broome County. I am writing to you in regards to the Trout Stream Management Plan that was released. Although I am not an angler, I do care for the economic wellbeing of my community and I am a strong proponent of environmental stewardship. To begin, I am very grateful that the Upper Delaware River tailwaters have been classified as “wild-premier.” I believe that this will promote the Upper Delaware River, bringing in visitors who will help stimulate the local economy; especially regional residents who would normally fish on the streams of the Susquehanna River watershed. I do ask that the classification of “wild-premier” be extended down into Sullivan County as I know that the angling community regards the Delaware River down to Callicoon as a premier fishery. Furthermore, I am sure that businesses in the towns of Hancock and Freemont would be grateful for the extra business revenue that comes from existing in a “wild-premier” fishery.

To continue, I am concerned about the extension of the angling season into winter. Although the plan does have some literature on the subject, none of the literature addresses the effects of a

catch and release policy in highly fished reaches. I have also researched the topic on my own and have found the evidence to be inconclusive for highly fished and not stocked reaches, such as the Upper Delaware River. I worry that the increased usage of our streams would irrevocably damage our state's stream's ecosystems by causing a decreased trout population and decreased trout spawning. Without a healthy trout population, the amount of tourists would almost certainly decrease. Any decrease in tourism could impact the already fragile economics of the Upper Delaware River and could potentially cause many businesses to close and many local residents to lose their jobs. I am asking the New York State Department of Environmental Conservation to research the effects of introducing a winter angling season on the trout population in our streams, the effects the season would have on spawning, and the effects the season would have on the maintenance of the aquatic ecosystems that currently exist in New York.

383) "I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st."

I have been a NY non-resident fishing & hunting license holder for decades. Making the trout season open for the entire year will ultimately decimate the wild trout population.

384) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

The existing trout fishing season regulations are essential for protection of species that spawn in the fall, particularly brook trout and brown trout.

385) Please leave the season as is. To protect the native brook trout in NY I only fish small mountain streams every few years just to protect them.

I have noticed many more fisherman taking them as well.

They need to be protected as much as possible before they are all gone

386) I have been a fly fisherman for trout in NY State for 45 years. I have been blessed to live very close to the Delaware River system and have seen the entire Catskill fishery improve with sound management decisions, including a much needed closed season to protect wild spawning trout. On any given day from April until September you will see license plates from around the country (and folks from around the world) visiting the Catskill region for its world renowned fishing. Fishing tourism is big business in NY State for a reason- it is fantastic fishing! Opening the season to angling during the spawning period seriously jeopardizes the fragile resource we enjoy. Spawning trout are most vulnerable during this low water period. Instead of thwarting attacks by eagles, kingfishers, herons and otters, to this list we would have to add humans who will pillage these fish as they are attempting to pass on their genetics. Make no mistake that with the information age we are in, there are those who will find and share which spawning tributaries are productive. We may see a collapse of the wild trout population. To ban fracking to protect the water and then allowing the wholesale raping of the spawning fish is not only short sighted, but a potential nail in the coffin to wild trout fishing. I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

387) I've never written an email to the NY Division of Wildlife. However, I believe we have a monumental opportunity to build and extend our reputation as a world-class Wild fishery. I believe the Esopus Creek and NY State could be known as the Montana of the West, a national fly-fishing destination rivaling anywhere in the country.

When I think of fishing, the greatest opportunity man can have is to catch a wild fish. When I visit the Esopus or it's tributaries, or states like Montana or Colorado, the chase for fish that have

existed for millions of years is exhilarating and taps into a deeper story. Fishing has never been about the literal story (as exemplified by countless fish stories exaggerating the size of our boyhood catch!), fishing is about a greater pursuit. And the most exhilarating pursuit for a fisherman is to catch wild fish.

Importantly, the pursuit of wild fish does run counter to the notion of abundant fish. As proven by other trailblazing fisheries over the past 30 years, a wild fishery can yield population density exceeding the levels of stocked trout. For some fishermen, the benefits of wild fish may be that they simply catch more fish. It's not an either / or scenario, it's a both / and. There is a proven path to have BOTH abundant AND wild fish, and that path allows NY's Esopus Creek to maintain it's reputation as the "Cradle of American Fly-Fishing" and lead us into a brighter future that attracts anglers across the state and beyond.

Certain streams with perfect conditions can thrive as wild fisheries. As cited in the following groundbreaking research, "when hatchery fish are dumped in with wild trout, they are not used to finding their own food, and their nutrition and survival suffers at the same time that they are disrupting the feeding territories of wild trout. The behavior of hatchery trout also makes them more vulnerable to predation. The disruption of the behavior and territories of the wild trout both reduces their feeding efficiency and nutritional level and also makes them more vulnerable to predation than they previously were. Thus, both wild and hatchery fish have a lower survival rate when in the same stream area."
http://fwp.mt.gov/mtoutdoors/HTML/articles/2004/DickVincent.htm

I respectfully ask that you reconsider the proposed "Stocked-Extended" designation, and instead redesignate the Esopus Creek as "Wild-Quality" from the Allaben Portal to the Ashokan Reservoir, and "Wild" from the portal upstream to it's source. Additionally, I ask that you designate the Esopus tributaries as "Wild".

I believe we have an incredible opportunity that will change and extend the next 50-100 years of NY's great fishing legacy. I hope that you will strongly consider the above suggestions.

388) " I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st."

389) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between Oct 15th and April 1st.

390) I want to start by saying thank you for allowing anglers and local fishery advocates to voice their opinions on the trout management program in NYS. I am a Western New York fly angler and former environmental studies major who would love to see an emphasis placed on spawning habitat. In particular the removal of the Scoby dam on Cattaraugus Creek which eliminates the opportunity for our lake run “steelhead” to repopulate themselves most effectively. I am not sure what that would do the existing fishery above the dam but that’s why you guys are so important at the NYSDEC. One other note pertaining to habitat, is there any way to plant more trees for shade or some other sort of temperature relief to keep trout populations healthy in that 40-60 degree range? Keep up the good work and I look forward to staying up to date on the trout management plan for the future.

391) Please consider special regulations on the Catskill rivers located in Delaware, Greene, Sullivan and Ulster counties.

As residents and anglers, we ask you to consider keeping fishing season closed during October 15-April 1 and to keep the current catch and release areas open year round.

Trout are special. The waters they reside in are special. The lands where the waters flow throughout are special.

This simple regulation will protect the wilderness and angling heritage that the Catskills is known for. Our wild lands and waters deserve special protection to continue the preservation of our reputation and resources. Our trout deserve time to spawn in quietude, away from the threat of anglers. Our waters deserve a rest to regenerate for the next season to come. Fishing over spawning trout in the tributaries will certainly impact the next years wild trout population, as these fish endure year round stress and danger no matter how long the season is open for.

Keep trout season what itis- a special season to look forward to. A special time when Spring awakens the angler, local, and tourist to shake off the winter and rekindle their passion. Help local businesses gear up for the economic boom that happens from trout season.

Keep the tradition of the season opener alive!

The Catskills have wild land that is designated as state forest, forest preserve, wilderness area, and multi use recreation area. We ask NY DEC to practice responsible recreation and protect our Catskill rivers.

As Aldo Leopold stated, “Conservation is a state of harmony between men and land.” Please keep the harmony of these sacred trout waters intact.

392) Thanks for taking the time to read this. I’m excited for the DEC’s new trout stream plan and it’s implementation. I am 43 year old trout angler. I’ve been fly fishing for four years, mostly in Columbia County, the Esopus and Connecticut’s Farmington River. I’d like to just touch on a few things:

Management = Enforcement
I fish approximately one day a week from the beginning of the season until the end. 75% of that time is on NYS streams, and the other 25% is CT. Out of the 100s of days I’ve been on the water in NYS I have not had my fishing license checked once, and I have seen illegal and unsportsmanlike behavior many times on the NYS rivers. This includes stringers of fish being taken. The state needs to find the resources to hire and train individuals to be out on the water much more than they currently are.

Stocked vs. Wild
I seek out wild fish. I rarely fish water that is mostly stocked unless I know it has a sufficient amount of larger wild fish to target. When I do fish stocked waters, they are typically warmer streams in Columbia County that can’t support wild fish in a meaningful way. Those stocked trout are for the frying pan.

I learned to fish on the Esopus and spend more time there than any other stream. I love the amount of access, the beauty and the wild rainbow population. I have fished an equal amount of days this year as last (the shutdown has not expanded the number of days for me), and have noticed an improvement this year to past years. Larger rainbows and wild brown trout. I’ve always had success catching large numbers of small rainbows there - 20-40 fish days are normal, but this year I have had much more success catching larger trout. I don’t know if it has anything to do with the reduced amount of brown trout stocked here. Given the amount of trout in the water I don’t understand why this stream is stocked at all. It’s one of the few East Coast streams that supports a wild rainbow population. I would prefer this stream not be stocked at all. The stream is too deep and fast to really support a large population of bigger brown trout in my opinion as well.

Look to Connecticut

I believe the Farmington River is the bellwether stream that the DEC should look to. It sees a lot of pressure (often from many NY anglers), because it successfully produces large brown and rainbow trout. It is so well managed that the holdover rate of brown trout is substantial. The river is populated by tons of younger fisherman - many from NYC that go to fish there for the easy access, the large fish and a culture of respect to the trout and the habitat by the angler.

I'd love to see catch & release Trout Management Areas implemented and ENFORCED on the best of the Catskills rivers. I know it's not feasible to do so on every river, but I think the Esopus would benefit greatly from a five-mile stretch that requires barbless hooks, and catch & release.

Year-round season
I'll be the first to admit if the season was open year round I would fish year round. That said, I'd love to see the DEC really explore this on a case-by-case basis. I'm not sure it makes sense for the big brown trout rivers such as the Delaware system. It might make sense for the Esopus, however. I don't think it's a good idea for our smaller mountain streams.

Again, Connecticut successfully has implemented a year-round season on the Farmington and it's a great place to fish year round.

393) "I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st."

394) I'm requesting that the DEC manage the Esopus creek as a Wild Quality trout stream. I feel not only will this benefit the wild native rainbow trout population, but would benefit the trout population as a whole. The West Branch and Mainstem of the Delaware doesn't have a stoking program and these river have flourished considerably. I think the same could be said for the Esopus if it's also managed as a Wild Quality trout stream. I hope the DEC will seriously consider this request.

395) Please do not change the closed season for trout , you have a rare ecosystem please don't rock the boat .

396) I am writing to inform the DEC that I am in support of keeping trout fishing season closed from October until April 1.

397) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

398) I believe the only salmonids that should be strict catch and release, and or protected, with their seasons closed, during their spawn, are brook trout and Atlantic salmon. Every other trout species should be open to year round fishing, with catch and release regs specifically during each species spawn. I also believe the creel limits should be drastically reduced, with more catch and release stretches implemented on wild trout rivers like Esopus Creek. I also believe the proposed 23000 brown trout stocking for 2021 is a gross misuse of funds. Wouldn't it be more effective to allocate money wasted on trout stockings, on a river with an already abundant brown and rainbow trout population, with increased stream management funds going to buying and protecting more public fishing rights. And continued Stream rehabilitation and tree planting on banks? That river doesn't need 23000 stocked trout. Why does that number keep increasing? It will only continue to hurt the wild trout population most anglers would prefer to catch.

On another note, we should implement more catch and release to other species in the state as well, with extended seasons of catch and release, with artificial lures and flies.

So basically long seasons of strict catch and release with artificial bait only. Lower creel limits. Decrease stockings. And increase stream protection and rehabilitation!

399) I am an avid trout fisherman, and have been for over 60 years. For the last several years, I have made an annual pilgrimage to my home waters in the Catskills, my dad, [name redacted], was a fisheries and wildlife biologist and educator who spent his career workin the Department of Conservation and DEC. He retired as Director of the Division of Conservation Education. I worked as Natural Resources Coordinator for the Temporary Legislative Commission to Study the Catskills from 1973 to 1975, after which I completed my doctorate and became a professor of wildlife science until I retired in 2003. A lot of water has gone under the bridge since the Bromley family was known in the Catskills, but the memories are still there. And the hope and desire that this great fishery resource will be better managed in the future. I know, for a fact, that the fishery is in much better shape than when I worked in that region in the 1970's.

I have read the recommendations of the Friends of the Upper Delaware River group, of which I have been a member for years. I find they are well stated and founded, and I support them.

However, my intuition is that the human dimensions aspect of this fishery needs more attention. I fish mostly on the West Branch of the Delaware. Over the years, guide operated drift boats have increased in number dramatically. I know this generates economic benefits and allows many who are no longer able to wade the river to enjoy a great fishery. I also recognize that nearly all the guides do respect the wade fishermen, and I often enjoy brief visits with them and their clients as they pass me. Maybe it was just this year, but there seemed to be more drift boats than ever on the river in late May and early June. But, what is the social carrying capacity for drift boats? I understand this has become an issue on other river systems too. The one I am most familiar with is the South Holston River below South Holston Lake, which I fish every year several times. There is talk there about limiting the number of guides by a license system. If the objective of fishery management is to provide quality fishing experiences, then this and related issues should be studied to identify conflicts among users and plans made to reduce them.

400) Thank you for your time and commitment to redesigning and improving the NYS Inland Trout Stream Management Plan. I would like to make a general comment of support, specifically agreeing with the five desired outcomes listed in the plan. I hope you emphasize as much as possible the need for improved habitat, access, education and wild fish. This will direct your efforts towards sustainable cold water fisheries throughout the state, which is critically important to trout habitat, and ultimately provides a great deal to the quality of life of my friends and family.

I would like you to consider a few items special to many of us in Region 8:

1.) Consider moving Spring Creek to Wild Premiere or catch and release only. This is an amazing fishery that has been impacted greatly in recent years. There should be special attention to improve habitat, access and creel limits. Seth Green TU is interested in partnering on this and has local contacts to assist with a project in the public “900 section” of the creek. Spring Creek is one of the few streams in western NY that still has Brook Trout, which should be protected as much as possible under this plan.

2.) Not an inland stream, but Irondequoit Creek should have a separate plan that allows for reach regulation similar to what’s proposed. Many sections of the creek are spring fed and have thriving wild fish populations.

3.) Lastly, many sections of Oatka Creek are receiving a lot of angler pressure. There are long private sections that could be PFR; therefore, spreading out the pressure. I would be happy to assist with the PFR process and future habitat improvements in any section of the stream that’s

currently not public. It’s a beautiful river and a great resource to the community. Let's make more of it accessible!

401) Hello. I am writing to you as a long time member of the license buying public who frequents the Upper Delaware River system.

I am very pleased to see the new classification for the upper Delaware in your proposed plan, but I'd like to see it extended down river. In the early season trout are thriving and reproducing all the way down steam past Callicoon, NY. Please consider extending it father down river.

I'd also like to see a hook limit imposed. These trout are too delicate for plugs and other treble hooked apparatus which increase hook mortality. Barbless would be nice, too!

Also, since the entire watershed supports natural reproduction of both browns and rainbows, I believe it is crucial to maintain the closure of the season from November to April. In states where fishing is open in November, I see wading anglers regularly walk all over brown trout redds, even the educated anglers! The reproduction we do have can only be a result of the waters being closed during spawning, and a year round your season will hurt that.

Also, as you know, the tailwater fisheries of both the West and East Branches of the Delaware are highly valued by anglers and guides, providing income for local businesses. If water flows were better regulated, providing cold water downstream to Callicoon, the benefit to the local economy would increase and the trout's protection would be assured. The UDR system is a world class fishery, and it would be wonderful if you could intervene in flow management, if only to keep it the Big D from being treated like an irrigation ditch.

402) This is a great opportunity to protect and maximize our NY trout fishery.

First I applaud the emphasis on wild trout according to habitat capacity.

My issues are and always have been using a blanket regulation mentality. While understanding the limited manpower and monetary resources that NY has, if states as large as Alaska and Montana can manage their streams either regionally or individually, certainly NY can. The Upper Delaware is not Syracuse or Utica. DEC has publicly acknowledged that. Lets take full advantage of this chance, even if it requires a special stamp to fund it. In many conversations on the river with clients, the idea of a dedicated stamp has no resistance as long as the money stayed within the watershed/tail waters.

I am a long time, 30 years fly fishing guide. There has been a profusion of hook scarred, mandible damaged fish, really starting in the last 4 or 5 years. This seems to have occurred as a result of social media postings including several U Tube channels dedicated to gear fishing on the Upper Delaware tail waters. Using treble hoks on this system is a shame and should never be allowed. I cant begin to tell you the carnage I have witnessed and its a shame. We are supposed to evolve as we learn knowledge. Between throwing gear and or bait under centerpin rigs, there is serious damage being done with more social postings.

The spawning protections and closure dates were not arbitrary but I think started as a result of Norm McBrides telemetry study that indicated spring spawners still on redds in April, specifically, April 15th in tribs.

Being a long time guide, I have become friends with quite a few local fisherman. Its no secret up there that its like fishing in a barrel in the tribs during spawning season, and it occurs because they go there for easy fishing and a 5 fish limit, with no law enforcement which is ludicrous. Why

would you not have the same regs as water 20 yds below you. A 5 fish limit in todays world is just nuts and there is zero justification.

The classifications for the main stem should extend to Calicoon. Why wouldnt you, other than taking the easy way out. Again, see my references to Alaska and Montana.

It really seems that everyone but NY recognizes how special this fishery is. It should no longer be governed by state wide blanket regulations but given every chance to thrive. We cannot continue to fight ourselves. We have enough of issues trying to optimize releases to truly benefit the habitat and we really need NYDEC on our side. I listened to the on line presentation and heard a lot of promiising things but I also heard some excuses and justifications without any will to push through the resistance.

Lastly, I would hope that the other studies findings will be taken into effect. There is going to be a set of really promising data to use. It would be a shame not to take advantage of these joint state studies. I and others have also been providing data from the PITT tag program which hopefully has provided some good info regarding movement within this system.

Hopefully, DEC will no longer be pushed around by Albany. If we need more money, lets bypass Albany. This fishery and local economy depend upon it. Where else could you reap such an economic engine by just a bit more work and dedication.

Signage and enforcement, especially during spawning season is a no brainer. We would all like to believe that self enforcement will resolve itself, but I see it. That is fiction.

Please do not push this through as engraved in stone. It is way to important.

403) Good stuff! I strongly support the plan, overall.

404) I support regulations that protect wild and native trout for now and for future generations. Please keep the trout fishing season closed between October 15th and April 1st.

405) I ask you to reconsider your trout management plans for limiting to artificial bait only for the Wheatland Center Road to the confluence of Spring Creek section of Oatka creek in the hamlet of Mumford, NY. This section of a historic (Seth Green) creek is within walking distance of the residence of the Hamlet of Mumfords and has for years served as fertile spawning and touchstone ground for many fisherman of the area both young and old. I've personally introduced many first time fishers to the joys and respect of fishing by using live bait presentations in these water. followed by a meal of the catch of the day.

I've also hosted many food chain fishing adventures on this section of Oatka with live chubs captured from this same water on bread balls followed by the slow stalk to sight fish the resident northern pike and smallmouth bass. I'm concerned that special interests are behind this plan, the same elitist trout fisherman who cringe at the sight of kids on bikes with fishing poles and a can of worms heading out to the creek for an afternoon of fun. All said I believe you do a disservice to our local families, their culture and heritage by putting new rules and regulations in place barring the use of live bait and the keeping of 2 Trout over 12" during the traditional April 1st - October 16th season for this section of Oatka Creek.

406) I am in favor of the proposal for many reasons not least of which is that as angler pressure increases it is extremely important to protect our inland streams particularly wild streams and trout. I would like to see other items such as more catch and release requirements and a ban on fishing for a period of one week after stocking. Hopefully these will appear in future proposals. It is my sincere hope that this proposal is adopted.

407) Let me introduce myself, I am an fly fishing angler, NY fly fishing guide, Volunteer fly fishing instructor for Upstate NY Casting for Recovery, Vice President of the Diversity Initiative on the Trout Unlimited NY State Council, and I am a volunteer fly fishing instructor for Project Healing Waters, and an avid outdoors women who loves the NYS fishery.

I am pleased to read the draft Fisheries Management Plan for Inland Trout Streams in NYS. I am very much in support of this plan and want to thank the DEC Trout Stream Planning Committee and the Focus Group Participants for their hard work to date.

My areas of comment are around Partnerships – I am looking for a bit more description on the selection process & criteria to be used to in selection of fishery improvement projects.

Are the projects based on some Priority, risk, impact to fishery, funding, Local partnership participation or commitment? It would be helpful to spell out the criteria prior to starting to identify projects. Would the priorities be set for 1 project per region? Not sure who this will be managed?

I'm very pleased to see that the plan also calls for increasing the Bureau of Fisheries habitat expertise, for improving stream habitat enhancement.

Somewhere in your philosophy or management goals you should strive to achieve sustainability in the fishery. I want my grandkids to have wild & stock fish to fish to.

Finally, I love brook trout and would like to see a state wide catch and release (no kill) of any brook trout wild or stocked in the plan.

408) My name is [name redacted], and I believe we have a monumental opportunity to build and extend Esopus Creek's reputation as a world-class Wild fishery. I believe the Esopus Creek and NY State could become a national fly-fishing destination rivaling anywhere in the country, including wild rivers in Colorado, Montana, and Wyoming.

One of the greatest opportunities an angler can have is to catch a wild fish. The chase for fish that have existed for millions of years is exhilarating and taps into a deeper story. Fishing has never been about the literal story (as exemplified by countless fish stories exaggerating the size of our boyhood catch!), fishing is about a greater pursuit. And the most exhilarating pursuit for a fisherman is to catch wild fish.

Importantly, the pursuit of wild fish does run counter to the notion of abundant fish. As proven by other trailblazing fisheries over the past 30 years, a wild fishery can yield population density exceeding the levels of stocked trout. For some fishermen, the benefits of wild fish may be that they simply catch more fish. It's not an either / or scenario, it's a both / and. There is a proven path to have BOTH abundant AND wild fish, and that path allows NY's Esopus Creek to maintain it's reputation as the "Cradle of American Fly-Fishing" and lead us into a brighter future that attracts anglers across the state and beyond.

I respectfully ask that you reconsider the proposed "Stocked-Extended" designation, and instead redesignate the Esopus Creek as "Wild-Quality" from the Allaben Portal to the Ashokan Reservoir, and "Wild" from the portal upstream to it's source. Additionally, I ask that you designate the Esopus tributaries as "Wild". I believe we have an incredible opportunity that will change and extend the next 50-100 years of NY's great fishing legacy. I hope that you will strongly consider the above suggestions.

409) I have regularly visited (from New Jersey) the upper Delaware river area to fly fish for the past 20 years. As you know, it is a tremendous wild trout fishery and one of my favorite places to

fish in the country. I have read the Draft Fisheries Management Plan as well as the letter from FUDR to you dated June 19, 2020. Please accept this email as another voice that agrees with all of FUDR comments. In addition, I emphasize the following:

- Suggestions to Improve the Plan as it Impacts the UDR Tailwater Fishery
- The UDR Tailwaters are a highly unique New York fishery and should be managed as such.
- Unassessed/Unlisted tributaries of "Wild-Premier" reaches should automatically default to "Wild-Quality," not "Wild."
- The Statewide Plan should include provisions for the refinement of management practices based on evidence and recommendations from Wild-Premier Trout Management Plans.
- Retain existing special regulations in the East Branch and West Branch that prohibit angling to protect spawning beds.
- Fund a study to evaluate impacts of anglers in spawning tributaries and the impacts on young of the year trout.
- Fund the installation of educational signage where Redds are found.
- Extend the "Wild-Premier" designation on the main stem Delaware River Fishery downstream to Callicoon.
- New York State Department of Environmental Conservation (NYSDEC) should prioritize Oquaga Creek for an upgrade from "Stocked" to "Wild-Quality."
- FUDR believes that the NYSDEC Fisheries Bureau should be more assertive in their intra-agency communications and with the Decree Parties with regard to water releases to the UDR tailwaters with the protection of the wild trout fishery as the paramount management objective and concern.
- When fishing on "Wild," "Wild-Quality," or "Wild-Premier" reaches, anglers may only use single point hooks.
- The NYSDEC Fisheries Bureau should explore creative ways to enhance enforcement through diverse partnerships with conservation groups, anglers, landowners, and municipalities.
- The NYSDEC Fisheries Bureau should advocate for increased funding for improved enforcement in the NYSDEC budget.

410) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

411) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

412) Please practice safe conservation for trout and N.Y. state streams, rivers, lakes and all fishable waters.

413) Id like to give some input on the lower Oriskany Creek in Oneida County from the Clarks Mills bridge downstream to Oriskany. This stretch of the creek has never been designated a trout stream by the state. I've fished it my entire life and it was a world class fishery. My Grandfather Sam Acee owns property along the stream and when he was a part of the sportsman's alliance he acquired 14000 trout from the state and stocked it from the bridge in Walesville to the dam in Clark's Mills I believe in the early 50's. We've enjoyed many years of incredible fishing along this stretch catching many stream born fish in the 20"+ range. I fly fish it with other friends and family and we practice catch and release to preserve these beautiful and unique fish. My Uncle Hap Acee as well as my good friend Chris Cucharale are expert fly fisherman and both spent years on this stretch of the Oriskany. About five years ago we noticed a drastic change in the creek. The trout have all but disappeared except for the occasional stockie or holdover that has migrated

from the bridge in Clark Mills which is the farthest downstream its stocked. The suckers that were prolific are also gone as well as the chubs and horned aces. My Grandfather witnessed a discharge from the sewage treatment plant in Clark Mills that turned the stream a solid brown. When he inquired about it he was told there was a malfunction and they had to bypass something. This seemed to coincide with the demise of the fish. We also don't get the mayfly hatches like we once did. They're there just not in the numbers they used to be. I know this is long winded but I wanted you to get some history.

I would like to see the state do a study on this part of the stream and I would be willing to volunteer my time to help. I could collect water, soil samples or whatever is needed. This is an incredible piece of trout water that has held trophy size trout for several decades that are now gone. I think with some research and restoration it could be brought back to the stream it once was.

414) I agree something needs to be changed. The COTS method is outdated. Here in WNY we have seen a decline in the wild brown trout fishery over the last 5 years. ESTABLISHING WILD AND PREMIER Catch & Release water is long overdue..but how good is the water quality now on streams like the Oatka and the Wiscoy and Eastcoy... I think standards regarding flow, temperature and toxicology have to be monitored regularly to provide a successful plan.

415) I support existing regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15 and April 1. Trout fishing is both a pleasure to those who fly fish and an economic boon to businesses which support recreational fly fishing. Closing the season to protect spawning trout in the fall, particularly native brook trout, is essential.

416) I SUPPORT ALL WILD FISH KEEP THE RIVERS CLOSED OCT 15-APR 1

417) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

418) Specific Points in Draft Fisheries Management Plan

- P10. Habitat challenges – It surprises me that acid deposition and road salt are not also issues that require consideration and management. Even if they are not, I suggest explicitly saying that they are negligible so it is highlighted to the reader. There has been discussion on whether salt is the best solution for winter driving safety, especially in the ADKs.
- P10. I agree with the 5 guiding principles and am happy to see them articulated in this document.
- p13. Guiding Principles – I am happy to see that the DEC will be managing wild trout and stocked trout differently and very happy that the DEC intends to enhance wild trout habitat. I would very much like to have naturally reproducing trout (especially brook trout) but I understand many of the streams are marginal habitat at best. I am searching for wild brook trout water in Northern NY and am finding it difficult to know where I am legally allowed to explore in combination with which water is most suitable (i.e. cold enough). Something that I will contact DEC with in a separate email through the proper channels.
- P20-21. Stocked-Enhanced Category – My local stream (St. Regis River in St. Lawrence County) is fun to fish in the spring up until around June. I believe that there is large mortality in July and August due to the high temperatures. Every year I come back to the river in September and I only find bass and fallfish in all the places I used to find trout. Is it an option to stock early in the spring and then again in September? The total number of fish doesn't have to change (i.e. 75% stocked in spring and 25% in the fall) although I understand there are probably added costs to keeping some of the fish or raising new fish in the hatcheries for a longer duration. Part of the St. Regis is also year round C&R so a fall stocking would also largely benefit here.
- 5 Management Categories (Wild, Wild Quality, Wild Premier, Stocked, Stocked Extended) – It would be great to see how much funding or person-hrs are dedicated to each of

these 5 categories. I have heard several anglers who have lived and fished in NY for decades that the DEC puts far too much effort/funds in stocking and far too little on brook trout management and habitat restoration.

- P32. Information and Outreach – I would love to know more about non-PFR water where fishing is permitted and am looking forward to this.
- P33. Outreach Responsible Angler – I wholeheartedly support this. Suggest adding a category to address garbage such as cigarette butts, discarded monofilament/fluorocarbon line etc. I would also wholeheartedly support greater enforcement of littering and poaching violators.
- p34. Timeline – Suggest adding periodic public consultation to solicit feedback on the changes that are being made either in person or online in the years after milestones are reached.
- P60. St. Lawrence County – I would (selfishly) like to see St. Regis River be stocked-enhanced. There is a section that is 365 C&R and it would benefit from a stocking in the fall. I believe that there is very high mortality in July/August. I understand there are many criteria to consider here.

Additional Comments:

- I am interested to know how this document works in combination with other DEC trout fishing strategy guides such as how to manage brook trout ponds in the Adirondacks. There are important management issues (pond acidification, stocking of bass/perch, stocking, access, etc) that I would like to know more about. If there are other related documents, I suggest listing them within this document so the reader can see how the Fisheries Management Plan fits into the overall DEC strategy.
- I suggest that fly fishing guides be made a special stakeholder group in any further consultations and to actively solicit their feedback. They are constantly on the water and constantly evaluating how the fish populations are doing. They intuitively understand all the differing factors that affect the fisheries such as hot summer weather, acid deposition, anchor ice, poaching, habitat destruction, littering etc. They also bring revenue into New York State. As DEC is a state organization, and the state government ought to be making decisions based on economic, environmental and social factors, they are the perfect group to give enhanced feedback, more than the average angler who may get out several times in a season. The occasional angler is also an important stakeholder group that should be considered by the DEC; however, the guides can give you more in-depth and coherent feedback.
- This may be "Pie in the Sky" dreaming but there is an opportunity to make New York State more of a destination for other American fishers to visit and generate additional tourism dollars. The Catskills are credited with being the birthplace of American Fly Fishing and New York State is home to several very prestigious rivers that are well known nationwide to fly fishers (West Branch Ausable, Salmon River in Pulaski, Delaware system, Beaverkill etc). There is an opportunity in this process to create/manage/protect some very special rivers that other fly fishers would come to explore, especially for brook trout. Perhaps that qualifies under Wild-Premier or perhaps that water can be stocked trout water but the stream has so much great habitat that holdovers are more common. There can be good brook trout fishing all through the Northeast but maybe there is an opportunity to create a "blue ribbon" brook trout stream that anglers flock to?
- Lastly, I live in Potsdam, NY (St. Lawrence County). I am trained as an engineer and have worked as a corporate consultant to large corporations doing technical analysis as well as stakeholder meetings focusing on triple bottom line decision making. I am quite handy on spreadsheets and am able-bodied for hands-on projects. Please let me know if there is an opportunity to volunteer for any of the projects in the Fisheries Management Plan and I am happy to do so. Happy to travel within St. Lawrence and Franklin counties.

419) Would you please clarify what the guidelines will be under the proposed plan for issuing stocking permits for that part of the Upper Beaverkill in Ulster county (i.e., the portion of the River more than 0.5 miles upstream of the Covered Bridge). That portion of the River is occupied almost entirely by private fishing clubs, including two of the oldest in the country, and has been

stocked for over 100 years. The inability to continue stocking would have an enormously detrimental effect on those clubs and, correspondingly, the local economy.

420) I am writing to express my opposition to the trout stream plan proposal in part. Some of you know that I'm a fly fishing guide on the Upper Delaware system including the Beaverkill, Willowemoc and Neversink rivers. The river and fishing is my livelihood and I do not wish to see a decrease in the protection of the fishery but an increase in its protection. I am highly opposed to the extension of the fishing season to make it an all year fishery even though it turns into catch and release Oct. 16th to March 31st. The extension will enable fisherman to fish over wild spawning fish in the upper west branch and east branch where they currently have protection. The removal of this protection will expose spawning fish to unnecessary harassment by the angler. Redds will be stepped on and destroyed, fish will be caught and in the process of handling both eggs & milt will be discharged. The simple science is the loss of redds, eggs, etc. equals the loss of thousands of wild fish. Science also tells us that thousands of fish are needed for the survival of just a few. To open the upper Wb and the Eb, (known spawning grounds) to all season fishing albeit catch & release thru the extension, is just removing the protection of this valuable resource. The idea of adding extra angling opportunities is really unnecessary as there are already year round opportunities in effect thru the border water section of the WB and Main Stem as well as the catch and release sections of the Beaverkill and Willowemoc. There is no need to expose prime spawning grounds to potential destruction. The biologists and myself are well aware that there is a high concentration of trout in the upper reaches of the WB and EB and opening these areas would be a magnet to those anglers looking to fish over a concentration of big fish and destroying habitat in the process.

I oppose the statewide management of wild trout streams or premier wild trout streams lumping a variety of streams into these categories. I do not believe that the upper Delaware tailwater can be compared to streams of much smaller size and even economic significance. Even the three branches of the Delaware are unique unto themselves and behave very differently due to water flows and temperature ranges and are managed differently. I do applaud the idea of letting the East branch turn into a wild classification with no stocking.

I am in support and stand behind FUDR's support for various aspects of the proposal and the suggestions to improve the proposal.

How the Plan will Improve the UDR Tailwater Fishery
This plan provides many benefits for the wild trout fishery in the Upper Delaware River (UDR) from the tailwaters below the Pepacton and Cannonsville Dams to the main stem confluence and downstream to Callicoon, and the rest of the UDR watershed, including the Beaverkill, Willowemoc, and Neversink basins. These include:

- Designation of the UDR Tailwaters as "Wild-Premier."
- Prioritizing wild trout through integrated habitat restoration goals.
- Elimination of stocking in the Upper East Branch.
- Reducing the trout harvest limit to one fish in total on the East Branch, West Branch, and Main Stem.
- Grandfathering in existing catch and release stretches.

Suggestions to Improve the Plan as it Impacts the UDR Tailwater Fishery

- The UDR Tailwaters are a highly unique New York fishery and should be managed as such.
- Unassessed/Unlisted tributaries of "Wild-Premier" reaches should automatically default to "Wild-Quality," not "Wild."
- The Statewide Plan should include provisions for the refinement of management practices based on evidence and recommendations from Wild-Premier Trout Management Plans.
- Retain existing special regulations in the East Branch and West Branch that prohibit angling to protect spawning beds.

- Fund a study to evaluate impacts of anglers in spawning tributaries and the impacts on young of the year trout.
- Fund the installation of educational signage where Redds are found.
- Extend the "Wild-Premier" designation on the main stem Delaware River Fishery downstream to Callicoon.
- New York State Department of Environmental Conservation (NYSDEC) should prioritize Oquaga Creek for an upgrade from "Stocked" to "Wild-Quality."
- FUDR believes that the NYSDEC Fisheries Bureau should be more assertive in their intra-agency communications and with the Decree Parties with regard to water releases to the UDR tailwaters with the protection of the wild trout fishery as the paramount management objective and concern.
- When fishing on "Wild," "Wild-Quality," or "Wild-Premier" reaches, anglers may only use single point hooks.
- The NYSDEC Fisheries Bureau should explore creative ways to enhance enforcement through diverse partnerships with conservation groups, anglers, landowners, and municipalities.
- The NYSDEC Fisheries Bureau should advocate for increased funding for improved enforcement in the NYSDEC budget.

421) Thank you for the opportunity to consider and respond to the draft management plan for inland trout streams. Effective and meaningful natural resource management not only considers management strategies that improve the ecology and diversity of the resource, but also examines the needs and desires of the human population for which the management is designed to benefit. I hope you find my criticism and suggestions are balance in meeting the needs of both the environment and the angling public.

1. Plan scope: I do not agree with the assertion in the draft management plan that "publicly accessible inland trout streams that contain wild or stocked brook, brown and rainbow trout..." should be the limit to the scope of inland trout management in NYS. The public (all trout anglers in NYS) can benefit (and rather substantially) from management agreements with landowners restricting public access to private stream reaches and should be a part of any comprehensive natural resource management plan. The use of public resources to improve high quality private trout streams is not exclusively beneficial to the land owner. The DEC website claims 76% of NYS forest land is privately owned. Through Public access agreements some trout streams on private land are included in the management plan, but the inland trout stream management plan ignores trout streams on private land without public access. Not considering these waters in a comprehensive management plan is perplexing; these streams have a unique characteristic not possessed by all other trout streams in the management plan: limited access/fishing pressure.

Identifying, protecting, and spreading genetic diversity for each of the trout species native or naturalized in the North Eastern United States is, in my opinion, fundamental to all other management goals. Without genetic diversity, NYS will not have a viable inland trout stream fishery. Without genetic diversity all the other management goals stated in the daft management plan will not be reached. Privately owned high quality trout stream reaches with limited public access are, or could be, a valuable reservoir of trout genetic diversity . NYS public resources should be used in studying, identifying, preserving and multiplying wild trout strains on private land, through agreements benefiting trout management goals and private land owner needs, even without public fishing access.

I suspect the bureaucratic sense of decision makers will dismiss my suggestion out-of-hand. "That's a ridiculous idea" they might say " NYS can't use public funds on private land without public access" Please don't fall into this dead-end line of reasoning. This type of reasoning and long standing policy, I think, is part of the impetus behind government mistrusts and general bad feelings held by some. What I suggest is not impossible, and could be beneficial for all . The management plan refers to studies to support management decisions, a good practice, but

absent are references to studies comparing trout mortality between public access streams and private stream reaches without public access. I think this is necessary data before concluding the causes of mortality and how fishing pressure influences populations.

2. Destination Fishing: This is not a problem with the management plan but a warning, something to think about and look for in the future. The act of publicly identifying stream types may increase fishing pressure on some waters. Classifying stream reaches may entice some fishermen to travel to waters new to them just because the classification is deemed desirable. If new fishing regulations influence fishing destinations in a similar way for enough anglers then fishing pressure and patterns from what it was when the management plan is adopted and several years later may be very different. Might require managers to rethink harvest limits on some specific wild quality and wild premiere waters, and stocking numbers for other waters in the future.

3. Restricted harvest and bait fishing: Suggested harvest regulations for wild quality and wild premier stream reaches in the management plan are very restrictive. When management goals are to preserve the quality of the fishery by limiting the number of fish killed by angling, angling method must also be considered. Bait fishing will result in more collateral angling caused fish death than fishing with artificial lures. Removal of bait hooks, on average, will cause more damage to trout than removing hooks on artificial lures. Bait hooks often being deeper in the fish than artificial fly/lures. If managers are serious in preserving the quality of these fisheries, they may need to consider regulating angling method. Regulating angling method need not be universal to all waters allowing a harvest in a particular category, I think a wait and see and adjust where necessary approach might work for this issue.

4. Stocking suggestion: Maybe the DEC could peruse, Through an adopt a natural resource program, public help in stocking streams more evenly than just "bridge dumping". Conservation clubs, Boy Scouts, Conservation programs at BOCES and local schools, and other clubs like chapters of Trout Unlimited might be responsive in adopting a stream reach or area for stocking.

5. Public petition process missing from management plan: The best way to promote conservation and avoid the pitfalls of "the tragedy of the commons" is to involve the pubic in the management process; helps provide a sense of ownership. Kudos to the fishery management team for the level of pubic involvement in developing the management plan. I do not think public input should stop with adoption of the management plan, rather part of the management plan should specifically address ongoing meaningful public input. The plan has a section labeled: "Evaluation of Plan Strategies" but glaringly omits public involvement in the evaluation process. Why not include a form in the management plan for ongoing public input? A formal form might be most useful for the management team because computer friendly data could be collected over time to identify trends. Some kind of public input form will: 1. provide the public with an ongoing formal way to express opinions on how they perceive the management of a stream reach is working (correct management category, stream bank improvements, satisfaction, hours fished....) 2. Provide the bureau of fishery management data on public needs and wants somewhat categorized for easy analysis. 3. Help provide the needed balance between the environmental/ecological goals and satisfactory and sustainable use of the resource by the public necessary in managing any natural resource.

6.State wide C & R / artificial lures only Oct 16-March31: I think, with reservations, this will work and provide some fishing opportunities for some because I don't think the fishing pressure will be very high. However, in my opinion, the Bureau of Fisheries evidence for this regulation presented in the management plan is not conclusive. Please monitor this very carefully and consider seriously public input. Population data on some reaches will be necessary. There are so many variables between individual stream reaches (benthic structure, water quality, vegetation, seasonal flow change....) that generalizing this regulation's effect on trout populations is a poor management practice. The assumption this regulation will not significantly impact populations

may likely be true for most stream reaches, but I suspect the regulation will negatively impact trout populations in some reaches. Moreover, by comparing trout population data from targeted catch/release artificial lure only waters during a special regulation era to trout populations in a state wide regulation era, managers are assuming angler behavior will not change from one era to the other.

422) I support regulations that protect wild and native trout.

Please keep the trout fishing season closed between October 15th and April 1st.

423) "I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st."

424) You are probably receiving many letters about Catskill Rivers but; I'd bet you haven't received one about an overlooked fishery I call "The Wild West Branch Delaware River." Your probably saying " the West Branch Delaware is already a tailwater stream and enjoys many economic and fishing opportunities because of this. I call this "The Wild West Branch" (Above the Cannonsville Reservoir) because there are no dams from Walton upstream to Stamford. I believe we have a monumental opportunity to build and extend fishing & economic opportunities on the West Branch Delaware River aka (The Wild West Branch) upstream of the NYC Cannonsville Reservoir from Walton upstream almost 50 miles of river to Stamford. This section of West Branch Delaware has a reputation as a both stocked and wild fishery. This section of West Branch has a current season close of September 30th to protect spawning trout. I believe this section of the West Branch Delaware can become a national fly-fishing destination rivaling the same West Branch Delaware tailwater below/downstream of the Cannonsville Reservoir.

One of the greatest opportunities an angler can have is to catch a wild fish. The chase for fish that have existed for millions of years is exhilarating and taps into a deeper story. Fishing has never been about the literal story (as exemplified by countless fish stories exaggerating the size of our boyhood catch!), fishing is about a greater pursuit. And the most exhilarating pursuit for a fisherman is to catch wild fish.

Importantly, the pursuit of wild fish does run counter to the notion of abundant fish. As proven by other trailblazing fisheries over the past 30 years, a wild fishery can yield population density exceeding the levels of stocked trout. For some fishermen, the benefits of wild fish may be that they simply catch more fish. It's not an either / or scenario, it's a both / and. There is a proven path to have BOTH abundant AND wild fish, and that path allows NY's "Wild West Branch" to maintain it's reputation as a quality American Fly-Fishing river and lead to much needed fish protections and more local economic development for Delaware County NY.

I respectfully ask that you reconsider the proposed "Stocked-Extended" designation, and instead redesignate the The "Wild West Branch Delaware " as "Wild-Quality" from the The Little Delaware River in Delhi, NY to Beerston NYC DEP land begins the Cannonsville Reservoir, and "Stock Extended" from Delhi "Sherwood Bridge upstream to it's source in Stamford,NY. Additionally, I ask that you designate the Wild West Branch tributaries as "Wild" beginning with The Little Delaware downstream to Beerston NYC DEP begins Cannonsville Reservoir property. I believe we have an incredible opportunity that will change and extend the next 50-100 years of NY's great fishing legacy. I hope that you will strongly consider the above suggestions.

425) I believe we have a monumental opportunity to build and extend Esopus Creek's reputation as a world-class Wild fishery. I believe the Esopus Creek and NY State could become a national fly-fishing destination rivaling anywhere in the country, including wild rivers in Colorado, Montana, and Wyoming.

One of the greatest opportunities an angler can have is to catch a wild fish. The chase for fish that have existed for millions of years is exhilarating and taps into a deeper story. Fishing has never been about the literal story (as exemplified by countless fish stories exaggerating the size of our boyhood catch!), fishing is about a greater pursuit. And the most exhilarating pursuit for a fisherman is to catch wild fish.

Importantly, the pursuit of wild fish does run counter to the notion of abundant fish. As proven by other trailblazing fisheries over the past 30 years, a wild fishery can yield population density exceeding the levels of stocked trout. For some fishermen, the benefits of wild fish may be that they simply catch more fish. It's not an either / or scenario, it's a both / and. There is a proven path to have BOTH abundant AND wild fish, and that path allows NY's Esopus Creek to maintain it's reputation as the "Cradle of American Fly-Fishing" and lead us into a brighter future that attracts anglers across the state and beyond.

I respectfully ask that you reconsider the proposed "Stocked-Extended" designation, and instead redesignate the Esopus Creek as "Wild-Quality" from the Allaben Portal to the Ashokan Reservoir, and "Wild" from the portal upstream to it's source. Additionally, I ask that you designate the Esopus tributaries as "Wild". I believe we have an incredible opportunity that will change and extend the next 50-100 years of NY's great fishing legacy. I hope that you will strongly consider the above suggestions.

426) This year you did not put any fish in the willowemoc over 12 inches.
Also very few people I spoke with caught larger fish on the upper Beaverkill River.
As a licensed guide and supervisor for the Town of Rockland,
One of the most important things is for those people coming up from the metropolitan area, want to get bigger fish, and so do I.
It,s difficult to be the birthplace of American fly fishing, and all you catch is small fish.
Please consider the impacts on our economy if people go some where else.

427) Delaware, Greene, Sullivan and Ulster counties have wild land that is designated as state forest, forest preserve, wilderness area, and multi use recreation area. We ask NY DEC to practice responsible recreation and protect our Catskill rivers.
NY DEC to consider special regulations on Catskill rivers in these counties.
Keep current Catch and Release areas open all year round and keep current fishing season April 1-October 15. Protect spawning grounds for trout. Protect our fisheries. Protect our Catskill rivers.

428) I write to applaud the State of New York and the Department of Environmental Conversation for this important initiative and to share a few comments relating to the Management Plan.

I currently reside in New York City and fish extensively in Sullivan and Delaware Counties and am a member of a club in Sullivan County.

As an avid fly fisherman and long-time state resident, I have pursued wild and stocked trout across the state with considerable time spent in the Catskills, Adirondacks and western New York, among others, for the better part of the past 25 years.

Interestingly, my time astream has coincided with the prevailing management plan dating to the 1990s. Thus, it is with great interest that I read the Draft Fisheries Management Plan and very much appreciate the opportunity to share my opinion.

Foremost, in respect of Desired Outcomes, I very much share the opinion harbored by others of the importance of stream habitat as an essential good unto itself. Time spent outdoors on a high-quality watershed is satisfying irrespective of the fishing.

That said, improved stream and water quality cannot help but improve the fishing experience and success rates through increased carrying capacity and improved trout densities. Preserving the coldwater resource through headwaters protection and bank restoration, for example, knotweed removal and bank stabilization and reforestation, has the potential to enhance river carrying capacity by sustaining flows of cold water and concentrating such flows in natural stream channels.

To ensure efficient efforts, however, such stream improvement initiatives should be targeted at portions of rivers and streams with underlying characteristics suitable for season-long sheltering of trout. In short, target investments and stream improvements for the headwaters, spring-fed streams and tailwaters capable of sustaining wild and stocked trout populations throughout the summer season.

Conversely, where stocking and lower stream quality are extant, perhaps a sensible policy would involve managing such fisheries for put and take with medium sized fish, preferably brown trout to extend these seasonal fisheries for as long as practicable given environmental factors.

Thus, the planned categorization and varied stocking approach for streams deemed Wild and Stocked is a positive approach and satisfactory typology. That said, I would encourage an even more nuanced approach.

Indeed, for streams with the high water quality and other conditions necessary to support wild fisheries, my advice would be to ensure that stream improvement initiatives take precedence over aggressive stocking. High-quality natural habitat need not be squandered with heavy stocking and intensive, targeted fishing pressure (put and take approach of chasing the stocking truck). Keep it simple - provide the fundamental conditions for success and then allow the fisheries to take care of themselves.

Perhaps, in the interim, consider small scale stocking of juvenile fish in the late spring and fall to augment natural reproduction, but save the larger, potentially predator fish for less fragile ecosystems.

Finally, with respect to seasonal fishing, the current season opening in April and ending in mid-October would appear appropriate in furtherance of sustaining natural reproduction. Streams and headwaters capable of accommodating in-stream reproduction should be closed for a period of time to maximize such opportunities.

The Upper East Branch of the Delaware is an excellent case study where an extended season exists, but tributaries and the upper reaches above Shinhopple close in time to allow Brown Trout reproduction without the trampling and targeted fishing pressure, which an extended open season would no doubt result.

Tributaries and headwaters of all the Wild designated streams should continue to adhere to the hard stop of fishing on October 15th.
To extend the fishing season overall, which I support, lower reaches of some streams and lower quality watersheds would be better suited to extended seasons and/or designated catch and release second seasons, but such policies are incompatible in certain instances (i.e., streams categorized as "Wild") with the stated objective of enhancing wild trout fisheries in rivers with the requisite characteristics.

429) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

430) "I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st."

431) I'm a TU member and a 15-year-old fly fisherman; I live in Au Sable Forks. I have a request to extend the catch and release, fly only area.

One of my favorite fishing spots is the pool below the Wilmington Dam, and while the predominant trout species is brown trout there, there are actually brook trout up to 17 inches, maybe more (that's the biggest brookie I've caught there). That spot gets a lot of fishing pressure and is not a catch and release area. I think it needs to be made a catch and release area; I've witnessed a lot of googans keeping fish (more than their limit, many times) there. One moron tossed the fish he was catching (pretty large ones too) on the rocks to flop to death. This is unacceptable. I was on the verge of pushing him in, but it's clearly not a great way of handling a situation so I calmly informed him that to the best of my knowledge fish do not appreciate being tossed on the bank to die. I have had a few similar experiences here, all with non-fly anglers. I respectfully urge you to consider extending the catch-and-release, fly and single-hooked artificial lures-only area (none of those horrible barbed treble hooks) farther down the river; at least past the dam pool but the lower, the better. Many big stream-bred fish live there along with the tiny stockers, and since the bigger females are the best breeders this is a "breeding reservoir," if you will, of a lot of fish. So please consider my request. I know many fly anglers and even some conservation-minded ultralight spinfishers share my opinion. (I have nothing against bait fishermen if they fish properly, with small, barbless hooks and ultralight tackle and release their fish, but many bait fishermen I've met are just uneducated people who thought they'd try to go catch 'a mess' of fish for dinner. Even if these people do release fish, they often don't know how to handle them, and toss them into the water from a height after squeezing them hard in dry hands for quite a while to get their barbed treble hooks out.)

While it may be too radical to make the entire Au Sable and all its tributaries catch and release only for trout (as I think we should) or stop stocking fish (as I and my friends know we should, since it has been conclusively demonstrated that there will actually be less fish in a river after a year of stocked trout versus many more fish with wild ones only, since the stockers compete with the resident fish, but then are unable to survive themselves because they don't have proper instincts) an extended catch-and-release zone, artificial lures only, that includes the dam pool and some water below it will improve the fishing drastically in the lower West Branch below the dam and is surely not a radical or difficult solution.

432) Of the current proposals that are alarming are, “extending the season,” and getting rid of “unnecessary regulations.” More stocking? Seriously?

We need more regulations, especially on the Delaware river system. The float boats are killing the river literally. The experience as a wade fisherman is terrible. And the fish have no where to escape the relentless pressure.

You have to decrease of eliminate the fish that are able to be killed. People keeping stringers of large fish are destroying the resource. These rivers are will simply not support it. We need less stocking and more native fish. This should not be a cattle pen where we are raising fish for slaughter.

Our rivers are one of the last places to experience the natural beauty of our state. Not a resource to be greedily ransacked by guides and weekend lip rippers.

Make it all catch and release. Let the fish have some semblance of a natural life.

What is wrong with us as a species? We seem to want to maximize our enjoyment of everything at any cost.

Time to rethink what you're doing.

433) I am an avid fishing lover for many decades. I love to fish all seasons, for many different species across NY state where we are blessed with some of the most amazing natural beauty and wild fish populations anywhere. In that I also understand the important function we play to ensure that our future generations can experience this also. Where this small sacrifice we make to not fish during spawning season will help preserve the streams and native fish, I think is common sense for all.

I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

434) Thank you very much for putting this plan together with your entire team. Very much appreciated for all the efforts. I attended both meetings at the Central Square location. In general I agree with the proposal and excited to see how it evolves. I am especially excited to be able to fish year round on the spring influenced creeks that are currently closed in the winter. I currently have 3 year round creek in my area but are mostly freestones and usually ice up. I fully support c&r in the winter as well to maintain the population during the winter months.

I do wish a light fall stocking program was added to the proposal to increase opportunities in the winter months for especially for the warmer freestone streams.

I would like to see the resurvery priorities changed for Syracuse area streams. Skaneateles Creek and Nine Mile have the most wild fish density in the area and I have catch rate data to verify. Why would the state allow a stream like Nine Mile to be stocked with 28,0000 fish? or stock Skaneateles that is almost all C&R?

Lastly this is out of scope but I would also like to see a base flow put in place for Skaneateles Creek from the dam at the lake. Ideally 25cfs min. Dropping from 150cfs to 15cfs and running 15cfs all summer hinders what is already a great trout stream from becoming the best stream in the area.

435) I support regulations that protect wild, native and stocked trout. Please keep the trout fishing season closed between October 15th and April 1st.

I suggest you read Ed Van Put's book "Trout Fishing in the Catskills" and learn the history of protecting and growing trout in the Catskill waters. Then perhaps you'll realize why a closed season is so valuable a method to the maintenance of the trout population!

436) As a member of Trout Unlimited, I wanted to thank you for the hard work and effort on the Draft Fisheries Management Plan for Inland Trout Streams. The draft plan clearly shows an improved approach towards managing this important resource. There are several recommendations from the New York State Council of Trout Unlimited that I support and would ask to be considered. Specifically, this includes:
• Expanding management from reach scale to watershed scale to maximize habitat continuity and recovery of wild trout populations.
• Expanding protection and consideration of headwater streams as a critical link in the recovery and sustainability of native trout populations.
• Focus on the tributary benefits to achieving wild trout population recovery and increase tributary protection.

• Provide protection of wild and native trout during spawning through identification of spawning habitat and development of fishing season regulations designed to protect natural reproduction.
• Ensure that “stocked” or “stocked-extended” categories are appropriate within the watershed context.
• Consider watershed scale when planning, funding or prioritizing habitat restoration. Consider both private and public lands in the restoration strategy.
• Develop a monitoring and an adaptive management strategy to assess the effectiveness of management actions.
• Work between agency departments and bureaus within NYS DEC to identify and reduce the unintended hurdles to promote wild trout population recovery.
Please consider these important recommendations as you begin to finalize the plan. Thank you again for all your hard work.

437) I commend the DEC on its newly released “Draft Fisheries Management Plan for Inland Trout Streams in New York State”. The plan is to be lauded for its recognition of the superiority of wild trout, the desire to simplify regulations across the state, and the ever-present desire to expand access to the fishing public. This plan represents timely changes to a plan a generation old.

While timely, I disagree with the proposal in two areas:

1) Heavy Stocking of the Esopus
Stocking has been a part of fishing in New York for more than a century and has bolstered fish populations for hard hit fisheries. While stocking must remain a part of New York fishing, it should be focused on lesser waters, not a river already holding healthy populations of wild trout. Many of these “lesser” waters are near population centers and offer opportunities to anglers that reduce distance traveled, a concern in our new COVID-19 era.

Page 42 of the trout management plan shows the Esopus increasing stocking more than ten percent to over twenty thousand fish, making it the most stocked river in New York. This doesn’t make sense given my days on the water. The Esopus is a fantastic fishery with prolific brown and rainbow trout. The Esopus tributaries carry fantastic opportunities for brown and brook trout fishing including at least one pocket of genetically unique brook trout in the Town of Olive, Ulster County. Wild trout in the Esopus should be encouraged, not stressed with more frequent and larger stockings of competing hatchery trout.

The source of the Esopus’ classification as stocked-extended appears to be the 2013 Angyal study. This study must be viewed through the lens of the times. During the life of the 2010-2013 study, the Esopus suffered its worst flood on record resulting in untold damage to infrastructure and trout. Data collected at this time must be suspect. Please consider seeking or conducting further Esopus-specific research before committing to a significant increase in stocking. Based anecdotally on my time on the Esopus, I suspect the river holds enough wild trout to meet Wild-Quality classification, especially below the Shandaken Tunnel.

2) Year-Round Fishing
Year-round fishing presents a classic case of the “Tragedy of the Commons”. With 2020 bringing record angling to the State’s waters, an extended season would eliminate a time of rest for trout populations while providing for fishing of spawning fish and damage to spawning beds. While most anglers would appreciate the necessity of spawning, the taking of large trout over redds or damage to gravel beds while wading would still occur. If simplifying regulations is the desire, consider maintaining a closed winter season.

While the Department’s “Draft Fisheries Management Plan for Inland Trout Streams in New York State” isn’t perfect, I’ll again take the opportunity to commend its intent. New York has a

wonderful resource in its wild trout and this plan reflects the special role those wild trout play in angling. I encourage the state to fill voids in studies as responsible management must rest on a foundation of accurate data. I further encourage the state to separate the issues of year-round fishing and regulation streamlining. Lastly, recognize the fantastic fishing experience and wild trout that the Esopus provides and consider classifying it Wild-Quality.

438) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

439) I understand you're getting a lot of pressure from people outside the Catskills to open the streams all year round. It's an easy way to show you care about their economy. I can appreciate that. The problem is the Catskills residents and fisherman don't want these changes to happen at all. A compromise would be to make an exception for counties in the Catskills. For instance Sullivan, Delaware, Ulster, etc. I saw the list of people you consulted with for this new plan. None are from this area. This means by making an exception for our area, you aren't hurting the people who really want this new plan. It's a win/win for everyone involved. In fact, it will benefit the other areas more than your current plan. It would mean that if someone wanted to fish after October 15th, they couldn't do it in the Catskills and would have to go elsewhere. This would create even more tourism for areas of NY that needed it. You've made exceptions for this area before. For instance the antler restriction during hunting season. Please do it again.

Show all of NY that you care about their particular area, and make the Catskills exempt from these new changes. I moved here full time from Manhattan so that I could Fly Fish. I changed my entire life for Trout. That's how much I care. Show Catskills Trout that you care as much as me. Change your plan.

440) I just want to Thank. I support

441) The proposal to allow year round fishing or trout on waters with a wild reproducing population is most inadvisable. These stocks already face many obstacles to survival.

442) I am all for any improvements that will enhance the quality of our trout fishing in the state. NY is way behind! Personally, I don't care if a fish is stocked or natural, just like catching and releasing BIG trout. Sure it would be wonderful to fish native fish but not a real concern of mine. I was one of the key figures getting the C&R section implemented on the West Canada and had multi lingual signs made and posted.

We need better and more enforcement! I have been fishing the waters in CNY for 40+ years and have never seen such garbage and lawlessness in any state or country then on my home waters. The amount and frequency of garbage I pick up is sickening. They claim to not know the laws or under stand English now. Stringers full of fish all well over 12 inches. Last spring I was sick to my stomach when a man had 5 all over 20" fish on a stringer. Initially, I was trying to explain the law and it went bad quickly. Called the tip line and never heard a word. This is a daily occurrence on the Mohawk in Rome and sure in other heavily stocked waters too. Have fished that river thousands of times over 40+ years and seen a ECO twice. Last time was on Easter and they came for me. Funny how that works. But don't ticket all the litters and those who don't follow any rules.

If people want to eat what they catch so be it, but follow the dam rules. Many people if not more also just enjoy catching them and not talking about six inch stockies either. We need more C&R waters for those of use who don't kill trout and just enjoy quality peaceful fishing. C&R sections would be reduced stocking or enhanced stocking and far better fishing experience without all the beer or corn cans and put those resources elsewhere. Why the DEC is so hung up on numbers rather than quality is beyond me and that goes for deer too.

443) I think the new plan for trout streams will greatly hurt the health of the streams. Please keep these fisheries healthy. Three needs to be an off season to protect the spawning fish and to have a healthy stream for the rest of time.

444) "I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st."
We need to protect this valuable species.

445) On behalf of the residents of Delaware, Greene, Sullivan and Ulster counties and wildlife enthusiasts across New York State, I am writing today to protect the great trout streams.

I implore you to consider the history of these great streams such as the Beaverkill and Willomec. For years the rivers were underappreciated and over-utilized which led to alarming diminished levels of trout and other wildlife. Until regulations were put into place to protect it.

Please confirm that wild land is designated as state forest, forest preserve, wilderness area, and multi use recreation area. We ask NY DEC to practice responsible recreation and protect our Catskill rivers.

Keep current Catch and Release areas open all year round and keep current fishing season April 1-October 15. Protect spawning grounds for trout. Protect our fisheries. Protect our Catskill rivers.

446) [Name redacted] suggested that I contact you concerning Woodland Brook and the DEC's tentative plan to make it a "Wild Quality Stream" in the future. As I understand it, the stream would no longer be stocked, though fishing would still be allowed.

I, as my father before me, have been stocking an approximate 2 mile stretch of Woodland Brook annually. The landowners have agreed to post their land for fly fishing only--any other reason for being on their property would be considered trespassing. We have bought our trout from the Beaverkill Trout Hatchery ever since we began the stocking in 1965. This is all explained in the attached write-up THE TROUT FUND.

In a nutshell, we feel that prohibiting bait and lure fishing will insure that caught fish will have a better chance being returned to the stream relatively unharmed, to live another day. In other words--it's been our effort to conserve the integrity of the stream and its trout. for over 50 years.

I wanted you to know this, and have some questions about statements made in the draft management report that may need changing.

The report states that the Brook's not stocked. Last year we stocked 200 10 inch, 425 11 inch, and 20 15 inch trout, of which 360 were brook trout and the rest brown trout. We have stocked similar numbers annually.

There's a reference to splitting up the stream categories. I don't understand what this means.

The "resurvey priority" status for the stream is "low." Bob Adams believes this should be changed to "high." I think so too.

I imagine that classifying the Brook as a Wild Quality stream opens its waters to fishing with bait and lures, as well as fly-fishing, which in the long run I believe would be a detriment to the trout population. I would hope that the stream could be made a "fly fishing only" area--benefiting the native trout in the long run.

447) I have 5 comments on the draft Fisheries Management Plan for Inland Trout Streams in New York State:

1. The major tributaries to the Upper Delaware River, especially the Beaverkill and Willowemoc, should not be stocked with hatchery trout because of competition with native fish and the potential for hybridization. It is unlikely, given low development pressure, the preponderance of private land, and limited outcomes that upgrading these streams from Stocked Extended to Wild will happen through stream and habitat improvements. There should be another pathway for upgrading these streams such as behavioral change, ie anglers no longer expecting or desiring stocked fish.
2. Improving access and habitat improvement prioritization are both recognized as goals in the plan but there is little connection made between DFW and the other agencies that need to endorse this goal. I highly suggest incorporating into this plan an endorsement by the other agencies of the goal and a commitment to pursue to make this actionable and more than a wish.
3. Categorize the stretches of the Mongaup and Neversink recognized by anglers as prime dry fly waters as Wild with similar approach as 1. above.
4. Strengthen the outreach and implementation component of the plan. The outreach component stresses technological action in the form of a map. It also mentions engagement but does not provide any details on the modes, methods, frequency or expected outcomes of the engagement. For effective implementation the Division must commit significant resources to direct outreach in the form of meetings, webinars, printed materials, mailings, attitudinal surveys to gauge the effectiveness of the outreach. Also, you should include DEC staff training and interdepartmental staff straining to reach other NYS, PA, County and local staff who may have some role in implementation, outreach, understanding etc.
5. Align the NY strategy and regulations with the PA draft fisheries management plan as it applies to the border waters and tributaries of the Upper Delaware River Watershed in both PA and NY. This may take some iterative discussion and revisions. I've made the same comments on the PA plan.

448) I am a year round fisherman who lives on the upper section of the Willowemoc.

I am writing about the proposal to extend the fishing season for multiple Catskills rivers year round. As someone who lives on the Willo and loves to fish all four seasons you might expect me to be supportive of the idea of extending the fishing season to year round on more of our waterways. However, I am not. I am directly against the proposed changes.

I believe that part of our job as outdoorsmen and outdoorswomen and people who enjoy our natural resources is to shepherd, conserve and protect them. The fish in these rivers need time to spawn, feed, rest and develop unmolested and I do not think it's right or smart for us to change things so they cannot do that.

Let me also say that I appreciate the difficult position you might be in of trying to balance ecological health with the desires of the people who want to enjoy that ecology.

But the Upper Willowemoc and Delaware river support a very unique and special population of wild fish that need to be protected.

One other thought: as a hunter I am concerned about fisherman in the areas of these rivers that overlap with public and private hunting land. There are real dangers in mixing the seasons and sportsman populations like that and I worry about shooting accidents.

Please know that I am watching this issue very closely and that as a person who loves our waters and lands in the Catskills I feel strongly that we have to protect these fish populations first, and then enjoy our sport second.

And I'm a voter who will remember how this issue is decided and will weigh it as extremely important to me.

449) protect catskill rivers

450) Please make more stream catch and release.

451) I believe we have a monumental opportunity to build and extend Esopus Creek's reputation as a world-class Wild fishery. I believe the Esopus Creek and NY State could become a national fly-fishing destination rivaling anywhere in the country, including wild rivers in Colorado, Montana, and Wyoming.

One of the greatest opportunities an angler can have is to catch a wild fish. The chase for fish that have existed for millions of years is exhilarating and taps into a deeper story. Fishing has never been about the literal story (as exemplified by countless fish stories exaggerating the size of our boyhood catch!), fishing is about a greater pursuit. And the most exhilarating pursuit for a fisherman is to catch wild fish.

Importantly, the pursuit of wild fish does run counter to the notion of abundant fish. As proven by other trailblazing fisheries over the past 30 years, a wild fishery can yield population density exceeding the levels of stocked trout. For some fishermen, the benefits of wild fish may be that they simply catch more fish. It's not an either / or scenario, it's a both / and. There is a proven path to have BOTH abundant AND wild fish, and that path allows NY's Esopus Creek to maintain it's reputation as the "Cradle of American Fly-Fishing" and lead us into a brighter future that attracts anglers across the state and beyond.

I respectfully ask that you reconsider the proposed "Stocked-Extended" designation, and instead redesignate the Esopus Creek as "Wild-Quality" from the Allaben Portal to the Ashokan Reservoir, and "Wild" from the portal upstream to it's source. Additionally, I ask that you designate the Esopus tributaries as "Wild". I believe we have an incredible opportunity that will change and extend the next 50-100 years of NY's great fishing legacy. I hope that you will strongly consider the above suggestions.

452) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st. Very important for sustainability!

453) I'm asking that you consider special regulations on Catskill rivers in Delaware, Greene, Sullivan & Ulster counties.

Please keep catch & release open all year round in these counties, and keep the fishing season Apr 1 - Oct 1 in these counties. As an angler, i see that people can unknowingly disturb spawning fish & with added pressure in the highly trafficked fishery, it's important to give nature a time to rest. We can't possibly educate and police everyone with a year round season, so it's important to give the fishery a break with a regulated fishing season.

On behalf of the residents of Delaware, Greene, Sullivan and Ulster counties and wildlife enthusiasts across New York State, I am writing today to protect the great trout streams.

I implore you to consider the history of these great streams such as the Beaverkill and Willomec. For years the rivers were underappreciated and over-utilized which led to alarming diminished levels of trout and other wildlife. Until regulations were put into place to protect it.

Please confirm that wild land is designated as state forest, forest preserve, wilderness area, and multi use recreation area. We ask NY DEC to practice responsible recreation and protect our Catskill rivers.

Keep current Catch and Release areas open all year round and keep current fishing season April 1-October 15. Protect spawning grounds for trout. Protect our fisheries. Protect our Catskill rivers.

454) I am the president of the Beaverkill Falls Homeowners Association (the "BFHA") and on behalf of the BFHA (and its 30+ members) I am writing to comment on the above captioned plan. As I understand it, under this plan, owners of private water will no longer be able to obtain stocking permits if their water supports any local brook trout population. In the case of the BFHA, which owns a mile of the Upper Beaverkill, this rule would potentially preclude us from stocking water that has been stocked for over 100 years and would substantially diminish the value of our fishery. It would also have a detrimental economic impact on a number of local businesses and property owners. Given this, and in the absence of anything in the plan that would seem to take these factors into consideration, I can only object in the strongest terms to the plan as currently proposed. Ultimately, I think that the diminution in the value of the BFHA's property, as well of the other private fishing clubs and property owners on the Upper Beaverkill, that would result from implementing the plan as proposed is tantamount to a taking of property which would inevitably result in litigation.

455) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st. I have always been proud to know that NY State's environmental protection arm of government was called the NYSDEC, or 'Department of Environmental Conservation' and true to the last word in its name, took great precautions to conserve and ensure native Brook Trout were able to remain unbothered during some of the most vulnerable times of their lives (spawning, hatching, swim up, etc.). However, it seems incredibly short sighted to change this and open up or keep open fishing when there is a chance to injure or kill the very individuals that are needed to create the next generation of wild fish. It is unreasonable and unnecessary for the State to attempt to restock these potentially lost fish when it already occurs naturally, and at minimal cost.
Please consider changing the regulation. It affords excellent protection as it stands and should remain as is.

456) I am a proponent of protecting our state's valuable resource. FUDR has proposed great plans to protect and conserve wild trout. I fully support their proposals and I urge you to adopt them in full.

457) As a N.Y. State native, I grew up trout fishing on the Willowemoc and Beaverkill.

I am opposed to extending the trout fishing season as proposed by the Draft Inland Trout Stream Management Plan. We have seen the impact of global warming on the entomology and health of the steams.

The fish need a break to spawn and regenerate from the stress of the existing fishing season without further interference from extended fishing.

I feel It would be more helpful to establish a plan to eliminate non native fauna, such as Japanese Knotweed, which, beside low stream flow and higher temperatures is adverse to the health of the steams.

458) Please make the preservation of our trout and trout streams your main priority. Wild trout streams are few and far between and should be protected. As an avid fisherman who loves our

catskill and upstate ny fishery it would be a shame to see them fall to the wayside from mismanagement. Thank you for listening.

459) Keep current catch and release areas open all year round and keep current fishing season April 1 - October 15. Protect spawning grounds for trout.

460) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st. I just fished the West Branch of the Delaware yesterday for the first in my life. It is a truly world class trout stream that is as beautiful and challenging to fish as the rivers in Montana. How can I say that, I grew up in Missoula and Helena Montana and have fished some of the best that the area has to offer. The fish needs to have time to grow and rest. Keeping the current regulations allows for these fish to get bigger and healthier. I can assure you that most fishermen and women would rather give up freezing in the rivers November to March to have the opportunity to catch bigger and more fish.

461) I am writing to congratulate the NYSDEC on its draft fisheries management plan for in land trout streams in New York State. I believe this plan represent significant advances in the management of our trout fisheries. I am broadly supportive of the comments already sent to you by the Friends of the Upper Delaware River. In this email I want to add my particular emphasis on three points

First it is critical that the trout fisheries protection and planning be extended down to Callicoon on the main branch of the Delaware. I have fished this reach of the river regularly since 1991, and through the spring into early June is typically among the very best wild trout fishing particularly for rainbow trout that exists in the Delaware system. It deserves to be part of the management plan.

Second, I also believe that it is critical to better protect spawning rainbows in the Delaware tributaries. This includes the tributaries down to Callicoon. It is well known that the current season opening date is too early to protect the spawning rainbows and that those fish are hammered by meat fisherman in the spring while spawning.

Third, I was very attentive to the colloquy during our zoom conference call when I raised the issue of enforcement. The fisheries Bureau responded that you are not the enforcement agency. Respecting that fact, but notwithstanding that limitation, I believe that it is important that this plan expressly articulate how important enforcement is to its ultimate success. A plan that exists only on paper without enforcement is not likely to have the needed impact on the fishery. We who fish the upper Delaware regularly understand and have seen large amounts of violation of catch limits. Therefore I urge that this plan statement express the need for enhanced enforcement.

462) The upper tributaries are an important spawning habitat for trout in the entire Delaware River System. I would be disappointed if I see people walking on redds of spawning trout, which is a possibility under the new proposed regulations.

I am part of a community of fisherman in the Catskills who love these rivers and the fish that live in them. Please keep the Catskills out of your new plans.

463) First, let me just start by thanking you for all the hard work put forth by you and your team over the years. The work that you all do is truly noble. The UDR is an incredible resource and one that needs to be protected. It's easily the greatest wild trout river on this side of the Mississippi and arguably one of the finest in the country. In my opinion, what separates the UDR from any other river in the country is its location; a mere 2 hrs from the largest metro / densely populated areas in the US.

Over the last 5-10 years, I have noticed an increased amount of traffic and angling pressure on the UDR system. Again, this isn’t surprising given the caliber of river we are talking about here

and its overall proximity. However, it does drive home the point of proper management. At the end of the day, we are talking about a very fragile ecosystem and one that needs the right oversight. In my opinion, this updated management plan is a step in the right direction to securing its future. So, let me say thank you again for all the effort thus far.

I'm sure you are reading through a lot of the emails and I want to try and keep my comments concise. With that in mind, I will keep my focus on areas of improvement, recognizing that there is already a lot of positives imbedded in the updated management plan:

Increased DEC Presence: The UDR encompasses a large territory; probably something close to 75-100 miles of river. I think a larger DEC presence is a necessary part of enforcing all of the thoughtful rules and regulations you are attempting to roll out. FWIW, I have been fishing the UDR for ~10yrs and I have never once had my license checked

Extend Wild Premier: The mainstem of the Delaware is an incredible trout fishery all the way down to Callicoon. It's just as significant as any of the water that resides upstream of it. Let's extend the "Wild Premier" classification down through Callicoon. I think this is especially important today given the resurgence we have seen in towns such as Callicoon over the last few years. These smaller towns are thriving once again and it's largely due to the UDR.

Water Releases: We all know what a valuable commodity the water that flows through the UDR is; I drink it every day. I would love to see some language in this plan that provides more consistent flows during crucial times of year (i) during the summer when thermal stress is prevalent (ii) during the fall spawn when fish are actively sitting on reds (a decrease in flow at the wrong time can knock out entire portions of future trout populations)

Spawn/ Winter Special Regulations: Lets retain the regulations currently in place on the EB/WB and all of the key tributaries that prevent anglers from fishing during the fall spawn / during the winter months. This is a river that depends on wild trout. It's what brings people to the area and drives a lot of the local economies. We don't need additional human presence or fishing pressure during these critical months to interfere with that process. This is a concept that is in place on most notable trout rivers. Why relax it now?

Single-Point Hooks: The treble hook was candidly just not designed with catch and release in mind. Trout just don't have the jaw structure designed to withstand the damage caused by a treble hook. Let's move to a single-point hook requirement on all "Wild", "Wild Quality" and "Wild Premier" designations.

Increase "No Kill" Sections: Out of the 75-100 miles of fishable water on the UDR, we only have one 2 mile stretch on the WB that is currently "No Kill". Let's increase those sections. Why not have a "No Kill" section on both the EB and Mainstem as well?

464) As president of the Salmo Fontinalis Club on the Upper Beaverkill, situated in Ulster County, I feel it incumbent on me to represent our objection to what appears to be a new regulation to restrict or even completely eliminate stocked fish into the club waters. The Salmo Club has eight members who have supported all sorts of economic venues and businesses in the valley and nearby in Roscoe and Livingston Manor and have been doing so in one form or another since the 1870s. As the person in charge of stocking the 1+ miles of water over the past 15 years I can attest to the extremely productive native brook trout population. Anecdotally, at least, there has been no negative impact of introducing stocked fish on the native brooks that are plentiful and always returned to the stream. I do believe that eliminating stocking would substantially diminish the value of the property which the club has built over the years and even worse, have an extremely negative effect on the region.

465) I am a year round fisherman who lives on the upper Willowemoc river. While you might assume I support a year long season I am very against this proposal.

Why is this even on the table? It seems as though the DEC just wants to deregulate the fishery and not have to pay people to enforce the regulations? I have read the proposal and I would like to see more environmental science behind this decision and truth be told I would rather the state do less stocking and MORE stream management if the state is trying to save money.

The Willowemoc and the upper Delaware River system support a fragile and amazing wild trout population. I would gladly not fish rather than see people walking thru their spawning habitat in the winter and fall, especially since we already have year round water in the lower river. The upper tributaries are an important spawning habitat for trout in the entire river system and I will be heartbroken if I see people walking on their redds When their food supply is already scarce. Further more, it would be very dangerous to have people fishing on the upper Willowemoc and gamelands while people are actively hunting during this time of year. I am part of a community of fisherman in the Catskills who love these rivers and the fish that live in them and I assure you we will not forget whatever decision you choose to make regarding this matter.

466) My name is Tiffani Patchett and I am a Homeowner who lives on the upper Willowemoc river. I am very against this proposal of a year round trout season.

The Willowemoc and the upper Delaware River system support a fragile and amazing wild trout population. The upper tributaries are an important spawning habitat for trout in the entire river system and I will be heartbroken if I see people walking on their redds when their food supply is already scarce. Further more, it would be very dangerous to have people fishing on the upper Willowemoc and gamelands while people are actively hunting during this time of year. I am part of a community in the Catskills who love these rivers and the fish that live in them and I assure you we will not forget whatever decision you choose to make regarding this matter.

467) I just finished reviewing the draft plan and I have never seen so much blue skying and arbitrary assumptions in my over 60 years of beating the waters for trout. I could go over it page by page but to what end, just because it has been 30 years since it has been reviewed doe not mean you throw the baby out with the bath water. Since the DEC has taken a stance to NOT develop stock trout that reproduce you will continue to throwing good money after bad with the same results. Bottom line is that the cost to raise hatchery trout is becoming too costly! Since 1990, yes that's 30 year's ago, your stocking numbers have gone down. On the West Branch of the Sacandaga River near Wells, N.Y. the number of trout stocked has been cut in half, on top of that you have stopped stocking a lot other streams.

I completely disagree with stocking larger trout, fishing pressure will limit the fishing opportunity's to catch more trout over a given reach. I was at the Colonie, NY meeting and one of the big concerns was how you stock the fish. You pull over to the side of the road an dump the fish and John Doe follows the trucks and caches all the fish! Worst of all the fish stay in one spot and don't migrate up stream or down stream. So how can you designate one section of a reach for larger fish and another section for smaller ones! Fish can't read signs on the stream!

As far as catch and release from Oct to March, nonsense! We live in the northeast where during those months it is freezing cold and for the most part the fish go dormant due to cold stream conditions, a real blue skyer!

No where in this report does it talk about the administrative cost of this draft plan to implement and since DEC dollars for stocking have been dwindling over the last 30 years. The over all plan is a burocractic nigh mare.

I like the old phrase KISS, keep it simple stupid, in laymen's terms, what are the burocractic cost per pound now for stock fish and what will it be based on this new plan?

468) I am a resident of Tyler Hill, Pennsylvania in the Upper Delaware Region, a former long-time resident of New York State, and a holder of a lifetime NYS fishing license. I have fished the Upper Delaware River system for more than twenty years and spend most of my fishing time on the main stem of the Delaware from Lordville to Callicoon. I appreciate the opportunity to offer these comments on the NYSDEC "Draft Fisheries Management Plan for Inland Trout Streams in New York State (FMP, Draft Plan)."

I want to commend NYSDEC for the care and thought that has gone into preparing the Draft Plan. If properly implemented and with a few important changes, I believe that the plan will play a meaningful role in preserving and enhancing the outstanding wild Brook, Rainbow, and Brown Trout fishery in the Upper Delaware River region. I strongly support the Plan's designation of the UDR Tailwaters as a "Wild-Premier" fishery and its stated intention to prioritize wild trout populations through integrated habitat restoration goals while reducing reliance on hatchery fish and stocking. I also appreciate your efforts to simplify the management of New York's trout streams. Reducing the harvest limit to one fish per day throughout the entire tailwaters system on the East Branch, the West Branch, and the main stem of the Delaware below the reservoirs will both simplify the rules and provide enhanced protection for our wild trout population. At the same time, preserving the existing catch and release and thermal refuge zones in the UDR tailwaters on the West Branch and Oquaga Creek and in the Beaverkill/Willowemoc system retain important protections that are already well understood by anglers.

I would offer the following suggestions as ways to further improve the Draft Plan and its protection of this important wild trout fishery. First, I would not move forward with a new "Catch and Release Season" from October 16 - March 31 in the UDR system at this time. The existing special regulations in the East Branch and West Branch that prohibit angling to protect spawning beds are well understood and provide important protection for Brown Trout and Rainbow Trout spawning. Allowing anglers onto spawning beds during the spring and fall spawning seasons will invite more damage to the wild trout population when we really need more protection.

Second, I would extend the "Wild-Premier" designation on the main stem of the Delaware down to Callicoon. The wild trout fishery on the main stem from Lordville to Callicoon, and especially the strong wild Rainbow Trout fishery in this area, has sometimes been underappreciated and is deserving of this designation. If you have fished this part of the UDR system this spring, you will understand that this fishery is equal to other parts of the UDR system, and equally deserving of this designation despite some of the thermal challenges in the summer months. The same rules, including harvest limits, should apply to this part of the system as well.

Third, and somewhat related, the UDR tailwaters system really is a unique natural and economic resource that is among the finest in New York State and the eastern United States. The elements that make the UDR tailwaters system such an outstanding fishery -- continuous cold water releases from the New York City reservoirs, a strong insect population, supportive spawning habitat in the tributaries, and a healthy, reproducing wild Brook, Brown, and Rainbow Trout population -- argue that the system should be managed on an integrated basis. This means that important protections (harvest limits, "Wild-Premier" or "Wild-Quality" designations, etc.) should be extended to tributaries as well.

Finally, we all know that the continued health of this unique fishery and its economic contribution to New York State depend heavily upon a stable, steady, and reliable cold water resource from the New York City reservoirs as determined by the management of Delaware River flows by the Delaware River Basin Commission and the 1954 Supreme Court Decree Parties. I would urge the NYSDEC Fisheries Bureau, in partnership with the Division of Water and using the role of the

Fisheries Bureau staff on the DRBC SubCommittee on Ecological Flows, to be a strong voice on policy matters and management decisions affecting implementation of the Flexible Flow Management Program and day-to-day management of the reservoir system that are so important for this fishery. Yours can be an informed and valuable voice for sound decision making.

469) This is a comment on the draft plan regarding private stream stocking.

As I understand it, under this plan, owners of private water will no longer be able to obtain stocking permits if their water supports any local brook trout population. In the case of the water I fish this rule would potentially preclude clubs of which I am a member from stocking water that has been stocked for over 100 years and would substantially diminish the value of the fishery. It would also have a detrimental economic impact on a number of local businesses and property owners.

I object strongly to this aspect of the proposal.

Incidentally the water I fish is full of healthy unstocked brook trout as well as stocked fish. The brookies don't seem to need any help from you folks.

470) Thank you for the opportunity to comment on the NYSDEC "Draft Fisheries Management Plan for Inland Trout Streams in New York State."

Catskill Mountainkeeper is a 501(c)(3) non-profit organization based in Livingston Manor, Sullivan County, NY. Our mission is to protect the Catskills region's wild lands and natural resources, support smart development and sustainably grow our economy. With 40,000 supporters in the Catskills and beyond, Mountainkeeper works with many constituencies, including anglers and outdoor enthusiasts.

The Catskills region is a world-renowned trout fishing destination. Anglers flock here because of the high quality and quantity of the trout population, the pristine streams and rivers, and the historic nature of region as the birthplace of American fly-fishing. Trout fishing is integral to our region and is one of our most valuable assets. It draws tourism, supports our local economy, and fosters an appreciation of the outdoors. For this reason, it must be protected and preserved by any means necessary.

Our primary concern, along with those of our partner organization and many of our supporters, is the implementation of a new "Catch and Release Season" from October 16 – March 31. We feel that there is not sufficient evidence to support the extension of the fishing season. The data cited in the plan references fisheries that are substantially different from the highly unique Catskill region, which experiences greater fishing pressure due to our proximity to New York City and other nearby major metropolitan areas.

The risks associated with catch and release fishing, such as hooking mortality and red damage, pose significant threats to trout reproductive success. A general, year-round fishing season on trout streams would subject trout and their spawning areas to undue stress and disruption during spawning periods. Allowing trout to spawn undisturbed and giving trout populations the opportunity to recover between fishing seasons, is beneficial to trout, the environment, and anglers.

While stream flows and other fishery-independent factors cited in Appendix 1 are based on natural causes largely outside regulatory control, the additional threat of angling pressure and the subsequent harm to trout reproductive success which you are proposing to increase is well within the power of the NYSDEC to mitigate. We respectfully submit that allowing an additional

threat to trout population health (extending the trout season) because of the simple existence of a larger natural threats (e.g. stream flows) does not represent proactive and protective regulation.

Furthermore, the proposal to extend the angling season seems to be an attempt to solve a problem that doesn't exist. Of all the issues raised at NYSDEC's own public meetings on trout management, extending the fishing season rose to only the seventh most frequently expressed desire. Extending the season also stands in direct opposition to other, more frequently expressed desires such as stocked trout survival (the most common desire) and the opportunity to catch wild trout (third most common desire). Extending the angling season would increase angling pressure on both stocked and wild trout during the spawning season.

Lastly, Catskill Mountainkeeper is concerned about the proposed overlap between the extended fishing season and hunting season. We believe there are safety issues that may arise when hunters and anglers share an open season that need to be addressed. We also believe that these overlapping seasons stretch the capacity of NYSDEC enforcement staff. Enforcement officers tasked with ensuring the safety of hunters and prevent poaching will be unavailable to do the same for anglers.

Thank you very much for your consideration on this matter, which is so important to Catskill Mountainkeeper and residents of the Catskill region. We hope that you incorporate these comments into the record for on-going review by NYSDEC staff.

471) I sat in on your meeting at the Utica NYS-DEC sub office on the New Trout Management Plan . That meeting was Avery good meeting with positive verbal feedback from most anglers present. I am also the longtime Fish Chairman of the Federated Sportsmen's Clubs of Oneida County, & Leader of the Central New York Youth Fishing Educator ,longtime member of theMohawk Valley Chapter of Trout Unlimited ,President - Oneida Lake Association , and NYSOHF 1983 Inductee .

Also I am a retired Recreation Therapist (CTRS) where I worked with troubled children & I taught them how to enjoy ethical fishing .I am 68, white male with a partially disabled hand so I do not use a Fly Rod often. I am a multi species trophy angler and I use spinning rods & reels most of the time . When I am trout fishing enjoy bait fishing plus using spinners & spoons & small stick - baits & swim- baits too .Also I practice Catch & Release fishing & I have not kept a trout to eat as once the mid 1980's. lot over any given year and all my trips are less than a one hour 45 minute drive from my home in Yorkville, N.Y. .

From my observations your new Trout Management Plan looks very good to me . Your process covered all the bases and everyone had the opportunity to have input . You addressed all areas on concern with the goals of making our trout fisheries better with the quality of the experience increased for all types & level of experience of anglers. Also you are really thinking of our younger anglers who will be our new generation of trout anglers who will keep this great leisure activity/ family leisure activity moving forward into the future for quality trout fishing for future generations to experience & enjoy. Your new Trout Management Plan is excellent. Great job everyone. Good fishing & stay safe , (my first trout fishing trip was on a rainy Easter Sunday afternoon in mid April 1958 & with Father & Grand Father on the lower section of Oriskany Creek & we caught two nice Brown Trout plus I was hook on fishing for life)

472) I understand that the DEC is planning to block stocking permits on streams that hold native brook trout. As an owner of property along the upper Beaverkill, and an active member of trout fishing clubs in the area, I am vehemently opposed to this action.

Please know that I will participate in any activity (and potential litigation) to prevent this action should you decide to do so.

473) I live in New Jersey and come to New York many times every year to fly fish in the Esopus creek. I make the trip for the experience of trying to catch wild rainbow trout. I tell all my friends that I go to the Esopus explicitly for the opportunity catch the wild trout. And shh! don't tell anyone, but there are beautiful brookies in Woodland Valley.

This access to wild fish is why I choose the Esopus as my "go to" fishing and vacation spot.

Anything that you can do to enhance the wildness of this amazing fishery will keep me coming to fish and camp and rent and buy etc.

If the fishery starts to lean too much towards stocked fish, the magic for me, and many other anglers I assume, will be gone.

Importantly, the pursuit of wild fish doesn't run counter to the notion of abundant fish. As proven by other trailblazing fisheries over the past 30 years, a wild fishery can yield population density exceeding the levels of stocked trout. For some fishermen, the benefits of wild fish may be that they simply catch more fish. It's not an either / or scenario, it's a both / and. There is a proven path to have BOTH abundant AND wild fish, and that path allows NY's Esopus Creek to maintain it's reputation as the "Cradle of American Fly-Fishing" and lead us into a brighter future that attracts anglers across the state and beyond.

I respectfully ask that you reconsider the proposed "Stocked-Extended" designation, and instead redesignate the Esopus Creek as "Wild-Quality" from the Allaben Portal to the Ashokan Reservoir, and "Wild" from the portal upstream to it's source. Additionally, I ask that you designate the Esopus tributaries as "Wild". I believe we have an incredible opportunity that will change and extend the next 50-100 years of NY's great fishing legacy. I hope that you will strongly consider the above suggestions.

474) I fish in the Esopus Creek every year on my vacation. I have been coming up there for many years. I believe the Esopus Creek and NY State could become a national fly-fishing destination rivaling anywhere in the country, including wild rivers in Colorado, Montana, and Wyoming. I have fished all over the continental United States (38 states!) and I like fishing the Esopus as much as any streams out west.

One of the greatest opportunities an angler can have is to catch a wild fish. The chase for fish that have existed for millions of years is exhilarating and taps into a deeper story. Fishing has never been about the literal story (as exemplified by countless fish stories exaggerating the size of our boyhood catch!), fishing is about a greater pursuit. And the most exhilarating pursuit for a fisherman is to catch wild fish.

Importantly, the pursuit of wild fish does run counter to the notion of abundant fish. As proven by other trailblazing fisheries over the past 30 years, a wild fishery can yield population density exceeding the levels of stocked trout. For some fishermen, the benefits of wild fish may be that they simply catch more fish. It's not an either / or scenario, it's a both / and. There is a proven path to have BOTH abundant AND wild fish, and that path allows NY's Esopus Creek to maintain its reputation as the "Cradle of American Fly-Fishing" and lead us into a brighter future that attracts anglers across the state and beyond.

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extend the next 50-100 years of NY's great fishing legacy. I hope that you will strongly consider the above suggestions.

475) Keep current Catch and Release areas open all year round and keep current fishing season April 1 - October 15. Protect spawning grounds for trout, so our kids can enjoy them and also our grandchildren. Protect our fisheries.

476) I hope all is well, and thank you for the opportunity to provide comment on the “Draft Fisheries Management Plan for Inland Trout Streams in New York State”. This is an excellent plan developed by the Bureau, and I look forward to its implementation for protecting the fisheries resources of NYS.

A few comments I’d like to provide:

1. Even with the information provided in the plan to the contrary, I am still concerned with the potential for the physical disturbance of active redds by wading anglers and resulting loss in recruitment. The principal concern in the plan is for protecting wild trout and this seems to go against that principal. Catch and release during spawning periods definitely will not improve or enhance recruitment objectives.
2. A professor that I haven’t been able to contact (so I won’t use his name because I waited to the last minute on this) used to state that fish mortality is often the result of multiple stressors on fish. This can include physical stress from poor water quality for that particular fishery resource (DO, temp, pH, ammonia, contaminants etc), disease, parasites, stress from being hooked and often fought to exhaustion, handling stress, and spawning stress. Any of these stressors added together can throw individual fish over the edge and result in mortality. Spawning fish are potentially one stress factor away from death.
3. I also have a concern for angling during the hottest summer months. A friend of mine dug a pond years ago that supported trout. RT were stocked with amazing growth rates, reaching 19” as 2+ fish! During the hot part of summer I landed 2, 19 inch fish on spinners. I brought them in as fast as possible to minimize hooking stress, and clipped a small part of the caudal fin for marking. Also these fish were never removed from the water during handling and swam away faster than you can imagine. The next day, both fish were dead. Not much of a study with a sample size of 2, but I never thought I’d see dead fish the next day. The pond was deep and stratified so the hooked fish were briefly exposed to warmer surface temps during handling. Anyway, a seasonal hooking mortality study might be interesting for a local college to conduct. I’m glad to see DEC will pursue more education regarding fishing.
4. Probably my most controversial comment is regarding fly fishing. I’d like to see more education into the pitfalls of fighting fish to exhaustion, especially during the heat of summer. I am fairly confident that released fish, even though they swim away will end up dead due to the multiple stress factors.
5. Possibly limit year round fishing to waters with little to no recruitment but where DEC will provide extended stocking.
6. Would like to see more PVC pipe receptacles at access areas for collecting old fishing line…to much line is just discarded in the water.

477) fjust a quick note to say it's been a great season on the Esopus for wild rainbows and I haven't seen the river so healthy in the time I've fished it (1998-2020). I'd like to say:

-Please consider keeping the current catch and release areas open all year but have the regular season go April 1 - October 15 to protect the spawn.

-Please consider reducing numbers in the stocking of brown trout. I think The Espous could become a wild fishery that rivals the rivers I spend thousands of dollars fishing each year in Montana and Colorado. I'd love to stay home and spend that money locally, and I'd love to think we could boost angler tourism the way Montana did when they stopped stocking the Madison and nurtured it as a wild fishery.

-Thank you so much for the May 2019 ticketing of two anglers attempting to keep 35 smallmouth from the reservoir! That story was so great to read, not only did you get them, the fish were released off of that long stringer. We've all seen how hard it can be to keep things in check and it was so great to see such a success at stopping those two! Thanks for all that you do.

478) I am not going to try to respond to all the issues, but the one that most concerns me is the thought of allowing for fishing of any kind during the various spawning seasons of the different rivers. This is so dangerous to the success of the fish populations themselves, I find it difficult to understand why anyone who loves the sport, to allow. Please do not do it! We are not idiots, we can help people understand the reasons, and seasons, for complete prohibitions at the specified places and times. PLEASE DO NOT APPROVE YEAR-ROUND FISHING FOR TROUT.

479) I am the President of the Beaverkill Stream Club located in Lew Beach. We have over 60 members and we are dedicated to conservation and has helped preserve our portion of the Beaverkill Valley and improve stream conditions for trout. The Club has been stocking rainbow and brown trout along our 4 miles for many year. Our review of the potential “Wild” stream designation for our section and Stocking Permit proposed rule, would significantly impair our ability to stock fish and substantially decrease the value of the Club properties. We hope that you would consider several options:

Recommendation 1- Extend the river classification of “Stocking -Extended” from the Beaverkill Covered Bridge to 1 mile above the Beaverkill Falls.

Recommendation 2 – Public access should not be a criteria for stocking permits, this is a landowners choice. I believe the current “Stocking Permit” proposal is going to receive widespread criticism from private property owners and clubs and will generate many lawsuits for the DEC. In my opinion as it pertains to the Lew Beach Valley, many businesses and landowner’s will be harmed and their property values substantially impaired. This will potentially reduce real estate tax. The plan. as proposed, is tantamount to a taking of property which would inevitably result in litigation.

On behalf of the members of the Beaverkill Stream Club, I strongly request you to consider our proposed suggestions.

480) I am a member of the Beaverkill Mountain Club, the Beaverkill Stream Club, the Beaverkill Falls Homeowners Association, and the Adirondack League Club. I am writing to comment on the plan mentioned in the subject line. My understanding is that this plan will prohibit owners of private water from obtaining stocking permits if their water supports a local brook trout population. In the case of the several fishing clubs and associations I am part of, this would prohibit stocking all of the privately owned water. All of this water has been stocked and managed for over 100 years to produce the best possible fishing experience for the members. Additionally, all of this private water and the surrounding lands have been treated with good stewardship being the top priority. Ending the stocking programs would have a significant negative impact on the quality of the fishery in all cases. As such, the value of membership would decline and a negative impact would be felt by many local businesses and property owners. While I understand the desire to increase public fishing access I think it’s important to recognize the cost. The first is to the land and fishery- Having experienced public fishing and

camping I can unequivocally say that the private land and water is treated with more care and respect. Not that every camper or fisherman on these properties is neglectful, quite the opposite, but enough are to cause serious disruption. One only has to look at the amount of stream-side or campground trash left behind, or the many anglers keeping well over their limit of fish to notice. The stark difference to me between public and private access is that the private water remains less polluted and abused. I wish it weren't the case, but, sadly, it is. Prohibiting stocking in private water may lead to opening more water to public use. Unfortunately that means that more land and water in our beautiful state will be subjected to the abuse that some inconsiderate users will put upon it. The second is to me personally- As a private water owner I have spent considerable energy and money managing my resources. My clubs and associations have worked for years to help maintain the quality of the fisheries as well as the land around it. We worked with NYS agencies and provided both financial support and testable fisheries for important research that benefits all water, public and private. In addition I have paid for memberships and real estate, and the associated taxes, for the opportunity to enjoy these resources. Prohibiting private water owners from stocking will diminish all of the time and treasure invested in maintaining them over the years and will negatively impact the property values associated with the private water. The DEC will be taking away my current value as a land owner and diminishing the efforts and expenses of my investments to date. Implementing this plan would, effectively, be akin to taking away my property and the investment I have made in it and, therefore, would have to lead to litigation.

481) Thank you for the opportunity to comment on the NYSDEC Fisheries Management Plan. Although my primary residence is in New Jersey, my husband and I own a second home in Cooks Falls, NY on the Beaverkill and have fished throughout the Upper Delaware system for more than twenty years. Additionally, I am a member of the Board of Trustees of Friends of the Upper Delaware River and support the comments they provided on the Plan.

I have a few comments I wish to share on certain aspects of the Plan:

1. The current harvest levels on the Upper Delaware system are not sustainable given the high fishing pressure due to its proximity to the NY metro area. The entire Upper Delaware system from the Cannonsville and Pepacton Dams down to Callicoon should be designated catch and release only. In fact, even Cannonsville is an arbitrary cutoff as wild fish are present down to Damascus and beyond. In my opinion, a one-trout limit is still overly generous for the Upper Delaware tailwaters.
2. Opening up the fishing season to a full year in the Upper Delaware system is short sighted and ill advised. The fish reproduction is already impaired by the poorly managed water releases and exposing spawning fish to additional fishing pressure will negatively impact trout reproduction even further.
3. All stocking of the West Branch and East Branch of the Delaware and their tributaries should be prohibited, including Oquaga Creek.
4. I support the grandfathering of existing catch and release and thermal refuge zones in the Beaverkill/Willowemoc system. In fact, additional thermal refuges on these rivers should be explored and designated to further relieve pressure on the resource during the hottest part of the year.
5. The Plan should include an outright ban on multiple point hooks throughout the Upper Delaware system and its tributaries.

I appreciate you considering my comments and those of FUDR.

482) I am the president of the Beaverkill Mountain Club (BMC) which owns the historic Beaverkill Valley Inn. The Inn and Club are owners on the banks of the Upper Beaverkill river and is dependent upon Inn guests who fish. The Inn is the largest employer and tax payer in the area.

The draft plan would devastate our Inn's business. As I understand it, under this plan (referenced below) owners of private water, like BMC, will no longer be able to obtain stocking permits if their water supports any local brook trout population. In the case of the one mile of Inn water, this rule would potentially preclude us from stocking water that has been stocked for over 50 years and would substantially diminish the value of our fishery. The negative financial impact on the Inn, which has become a premier trout fishing destination, would be significant. The Inn locally employees approximately 25 individuals and sources much of our menu locally. Given this, and in the absence of anything in the plan that would seem to take these factors into consideration, we object in the strongest terms to the plan as currently proposed. We hope we have the opportunity to discuss our concerns directly with your team. Many thanks for your consideration.

Please contact me with any questions. Thank you for your attention.

483) I support regulations that protect wild and native trout. Please keep the trout fishing season closed between October 15th and April 1st.

Giving fish a break from us fisherman gives the fish a better chance at reproducing and thriving.

484) I am a New Jersey resident and holder of a NY non-resident fishing license, who travels to Ulster and Sullivan counties 5 - 10 times a year for trout fishing, mostly in the upper reaches of Beaverkill, well above the Beaverkill covered bridge. My annual expenditure in these counties exceeds $20,000. Stocked rainbow and brown trout account for the great bulk of my catch and fishing pleasure. I am distressed to read that these fish will be severely limited by the proposed terms of the Draft Plans. If this plan is implemented without substantially loosening its geographic reach, I will be forced to direct my trout fishing to other states. I am particularly against the ability of officials to apply these proposed rules to all trout areas, even in the absence of public access.

485) I am writing you to ask that you please keep the current Catch and Release areas open all year round, and keep the current fishing season from April 1 to October 15, to protect spawning grounds for trout in NY waters. Protect our fisheries.

I have been fishing NY trout streams since the 1970's and treasure the resource and all that it has to offer the fisherman and outdoorsman.

486) I am the Treasurer of the Beaverkill Trout Club, a non-profit member organization (over 30 members) that is dedicated to conservation and has helped preserve our portion of the Beaverkill Valley for over 110 years. The Club has been stocking rainbow and brown trout along the 3 miles stretch from just above the Beaverkill Covered Bridge to Lew Beach for well over 80 years. Our review of the potential "Wild" stream designation and Stocking Permit proposed rule, would significantly impair our ability to stock fish and substantially decrease the value of the Club properties. We hope that you would consider several options:

Recommendation 1- Extend the river classification of "Stocking -Extended" from the Beaverkill Covered Bridge to the Balsam Lake Club. It is my understanding that all properties in this stretch are historic put-and-take fisheries.

Recommendation 2 – Rewrite the "Stocking Permit" section of the proposed plan.

Public access should not be a relevant criteria for stocking permits, this is a landowners choice.

Landowners that own property surrounding "Wild" streams should not be mandated a goal of prioritizing Brook Trout for no good reason. Brook trout are abundant, not endangered and

cohabitate with other species. This selective focus reduces the benefit of stocking larger fish to landowners and fisherman.

I believe the “Stocking Permit” proposal is going to receive widespread criticism from private property owners and generate many lawsuits for the DEC. In my opinion as it pertains to the Lew Beach Valley, many businesses and landowner’s will be harmed and their property values substantially impaired. This plan as proposed is tantamount to a taking of property which would inevitably result in litigation.

On behalf of the members of the Beaverkill Trout Club, I strongly request you to consider our proposed changes.

487) I support the plan as written.

I suspect that anglers might plan their day to start at more limited categories and finish in the least restricted waters. I don't know if this would have any impact on your goals.

488) Thank you for the opportunity to comment on NYSDEC’s draft of new trout stream plan. I am delighted to see the focus on wild trout and habitat in the plan, as well as the clear distinction between wild and stocked streams and how they will be managed. It is an impressive and ambitious plan and I strongly support most aspects of it.

I am opposed however to the proposed new catch and release season from October 16 to March 31. My concern is that permitting the targeting of wild trout during spawning season, when they are most vulnerable, will only cause additional stress for the fish, create the risk of disturbance to their redds, and open the door to potential exploitation by unscrupulous anglers. I urge DEC to reconsider this aspect of plan, at least in relation to the Catskills and other streams with wild trout within easy reach of anglers in New York City and other large metro areas.

In addition, I urge DEC to reconsider the decision not to implement special restrictions for wild native Brook Trout – our only native species, “State fish,” and bellwether of healthy ecosystems. My preference would be for C&R only and habitat protection, as well as additional protection for the small pockets of genetically unique “heritage strain” Brook Trout that remain.

I also encourage DEC to consider additional protections for all wild trout in stocked streams in the hope of helping to sustain their populations (in light of the competition they face from hatchery fish, as well as the angling pressure and habitat deficiencies that necessitate stocking) and to stress the importance of wild trout. My preference would be for C&R only of all non-stocked species (e.g. wild Rainbow Trout and Brook Trout where only Brown Trout are stocked), and encouraged C&R release of all wild trout of the same species (e.g. wild Brown Trout where Brown Trout are also stocked). Anecdotally, the first trout I ever caught was a 14-16” wild Rainbow Trout on the Esopus five years ago. I didn’t grasp the significance at the time, but the experience spurred both my passion for angling and engagement in conservation. My son’s first trout were also wild, including a Brook Trout on the Willowemoc Creek at Wulff Run.

Lastly, I would like to express my support for the responses and recommendations of NY State Council TU and Friends of the Upper Delaware River, and the comments submitted yesterday by New York City Chapter TU, where I am currently an ‘officer’ and member of the board.

Thank you again for this opportunity to comment, and for your team’s commitment and efforts to improve trout fisheries across the State. I look forward to the final plan.

489) I just was informed about your plan to change fishing regulations. Please keep the trout fishing season closed between October 15th and April 1st! I support regulations that protect wild and native trout.

The current rules provide needed time for trout to spawn and recover from stresses produced during the open season.

A major change will produce many unintended consequences.

490) Thank you for DEC's efforts to update the NYS Trout Management Plan. There are many areas where drastic improvement is needed.

I strongly encourage DEC to simply follow it title - environmental conservation. To quote one of the founding ethos of Trout Unlimited "take care of the fish and the fishing will take care of itself". It is imperative that DEC adopt a similar mentality to allow for NYS trout fishing to truly flourish. If that does not happen, NYS will only continue to be a subpar angling destination that is not sought out by local or non-state residents.

For too long, DEC trout and fisheries management has been focused on catch rates/hour and harvest limits that do not correlate to protecting the resource. This methodology has led to overstocking programs and degradation of wild fish stocks and habitats.

I am deeply concerned about current proposals to expand fishing seasons, regardless of catch and release designations. Quite simply, fish deserve a break from our harassment. Fishing should be closed when fish are most vulnerable such as during spawning, winter time when fish are concentrated in holding areas and when caught and exposed to freezing air can have their gills damaged, and during summer when water reaches lethal temperature. By providing this protection the fishing quality will only be so much better during the open seasons.

DEC should look to other states such as Montana where their trout fisheries are held as a gold standard. Using Montana as an example, stocking programs where ended in the 1990a due to its negative impacts on wild fish stocks. Since stocking ending in Montana fish stocks have flourished. Another Montana example is "hoot-owl" restrictions that limits stream/river fishing to morning hours when water temperature reach lethal level in the afternoon. NYS DEC can and must look to enact similar protocols.

Harvest limits need to be severely reduced to not impact wild fish stocks. Large, breeding females that produce the most, high quality eggs should never be harvested. This points to spot limits if fish harvest is a must.

The Upper Delaware River system is by far, New York's best trout fishery. The system is wildly popular but is dangerously close to being fished to death. The endless drift boats are negatively impacting fish behavior and the fishing experience. Sections of the river system needs to be identified as "wade only" and drift boats not allowed at all during low water conditions. Further, the entire Upper Delaware River System should be catch and release only and stocking completely ended.

Again, I appreciate DEC's time and effort in updating the Trout Management Plan. I look forward to the seeing the above comments incorporated into the final plan.

491) Please consider keeping the current season and protecting catch and release areas open year round.

We love our Catskills rivers and ask you maintain current protective measures.

492) I grew up on the Esopus Creek at Mt. Pleasant, caught my first trout from it at three years old and have remained connected to it throughout my life. In my younger years I assisted with trout stocking as a Boy Scout in the late '50s and early '60s and still help whenever I can. I am presently Treasurer of the Ashokan-Pepacton Watershed Chapter of Trout Unlimited.

I believe that the last thing the Esopus needs is more stocking on top of already existing wild populations of rainbow trout, brown trout and, in tributary headwaters, brook trout! With a little help through flood plain management and habitat protection I think these wild populations could do quite well on their own.

I therefor feel that the "stocking extended" designation for the Esopus Creek is misguided and should definitely be reconsidered.

493) I am writing this in regard to providing input to you with reference to your recent draft proposal considering the Trout Management Plan.

I am an avid angler, resident and father who resides here in the Catskills and spend a considerable if not a majority of my time in the local waters, both angling and studying/observing nature. I am a conscious angler, who practices my craft in pursuit of conservation and preservation of what I consider to be our Catskill treasure-the wild, native trout which have survived and flourished in our streams.

The streams in which I spend the majority of my time are the Esopus, and one of it's tributaries, the Birch Creek.

Please consider classifying the Esopus as a "wild fishery". In my physically educated opinion, my catch demonstrates that it is more than capable of sustaining such a classification. Although the demand for catch does determine the "need" to stock in some sense, many anglers, including myself, concur that they would rather see the Esopus become a model for "hands off" management, and allow it to continue in the direction it has already set out in.

A return to it's wild and natural state. The rainbows have returned and are in a great position to hold it. It is common knowledge that the introduction of additional species, such as brown trout-create excess competition and challenge this amazing progress that the rainbows already have made.

Not to mention the fact that in the Birch Creek, which I have fished for over 20 years, has become a brown trout stream by majority, verses the brook trout haven it once was. One does not have to ask too many questions to determine where these brown trout came from.

Let us seize the opportunity to provide demonstration and leadership in the designation of the esopus as a wild fishery. Let the Native fish of New York State retain it's smaller water habitat and not be pushed out by an introduced species.

Please also consider the impact that increasing access to waters and the extension of seasons create. As our park and surrounding waters become more and more popular, the existing rest periods and protection during spawn are in my opinion, and the opinion of all the anglers whom I know, integral to the responsible management of this fishery that we call home.

Thank you for the opportunity to provide this feedback and input. I consider myself blessed to have a chance for such involvement and inclusion.

494) The Home-Waters Chapter of Trout Unlimited (TU) represents Rensselaer County. Our members are a diverse group of fisherman and sportsman. Early on, we engaged in the process of developing the recently released draft of New York State Department of Environmental Conservation's (NYS DEC) Trout Management Plan (the Plan). Home-Waters TU and the NY State Council of TU are in agreement that the Plan reflects a new approach to trout management. We concur that the Plan is appropriate and reflects the thoughtfulness and scientific rigor of DEC staff.

The mission of Trout Unlimited is to conserve, protect, and restore North America's coldwater fisheries and their watersheds. The long-term goal implicit in our mission statement is achieving self-sustainability of salmonid populations. Home-Waters TU supports the guiding principles of the Plan to strive for self-sustaining populations of wild and native trout through habitat restoration and refining stocking practices while providing a diversity of fishing opportunities across the state. Please note that TU's strategy in providing feedback on the Plan is indicative of our organization's national, state, and local structure. National and state responses focus on broad commentary, while local chapter level responses focus on watershed specific concerns. Therefore Home-Waters TU is supporting the NY State Council's thoughtful comments on the Plan, and offers the following additional comments from our members as detailed below. Like other Chapters and the State Council, our feedback on the Plan is designed to be constructive, with the desired goal of supporting or recommending additional strategies or considerations that will not overwhelm its implementation.

- The Plan should not limit stream classifications to individual reaches, but should approach management on a watershed level or a stream complex level.
- Protection for streams should consider classifications for headwater and tributaries within a "stream complex". For example, the Poesten Kill mainstem, headwaters and tributaries can be considered a stream complex, with complimentary management of the Quacken Kill. The complex should receive classifications for stocking, and wild fish that consider the habitat and stream conditions along the entire stream complex. Consistent and sensible classifications will simplify the management decisions.
- Identifying and protecting spawning areas and potential spawning habitat in streams to promote robust repopulation and resiliency of wild fish. Consideration of a pilot project for egg stocking to determine if spawning, nursery and growth habitats can be maximized.
- Clear designations for stocked, stocked extended, and wild classifications that avoid complex arrangements such as stocked reaches dividing wild reaches.
- A clear strategy for improving streams through assessment and restoration, with a goal to upgrade streams based on habitat suitable for wild fish reproduction. NYS DEC should strive to promote additional wild Quality streams, with Catch and Release protections.
- Developing an evaluation plan to assess the effectiveness of management actions.
- Home-Waters TU is eager to reduce hurdles to progress, and assist NYS DEC with all of the above actions.
- Consider tackle restrictions for Catch and Release sections, including the restriction of barbed hooks, weighted hooks and treble hooks.

Members expressed satisfaction with Stocked Extended methods for extending the availability of stocked trout. Members also expressed an interest in fall stocking to improve late season and winter fishing in suitable reaches.

Satisfaction was also expressed for the idea of improved PFR mapping. Members thought that a listing such as Appendix 1should be maintained as well, but with better reach descriptions using plain English wording. This would be a substantial improvement in available data, which could also include links to recent fish survey data.

Home-Waters would like to congratulate NYS DEC for undertaking the process of develop the Plan, including the extensive outreach to anglers. The result is a workable draft Plan with much to like.

495) I wanted to register my support for the shift in focus from harvest to wild trout management and about the increased fishing time allowed via the catch and release/artificial lure only stipulation. As a life-long resident of the Finger Lakes Region, I have been concerned for decades about the poaching and snagging that goes on every spring and fall in the Finger Lakes' tributaries. I see three possible approaches to address the problem. The first would be to reduce the limit via catch and release regs or imposing a single fish daily limit.
A second and relatively simple way to reduce the problem would be to change the regulations regarding tackle. Limiting anglers to a single light splitshot no larger than an A/B size and requiring that it be at least 16 inches from the hook would make it harder for "lifters" to snag fish. Right now you can see them using two or three shot the size of OO Buck placed only inches from the hook. (Real Sportsmen!).

A third and relatively easy-to-implement solution would be both a significant increase in the fine for snagging but also a mandatory loss of fishing privileges for at least one-year. This egregious problem has gone unresolved for at least forty years. I certainly understand that the C.O.'s can't be everywhere, but adding some long overdue muscle to the regulations would give them the additional tools to keep violators in check. Thanks.

496) Im not really in favor of making oatka creek a catch and release from spring creek to bowerman road....takes away to many opportunities for kids to fish...

497) I bought and paid for a fishing license April 2 through your on line site and have yet to receive it .

Can you help ?

498) I live on the rondout overlooking what was once honk lake.
Nyc had an agreement in about 1980 to release minimal amounts of flow daily and it appears they have cut those flows impacting negatively on the areas upstream of the lake.
On route 55 about ½ mile below the rondout reservoir is a jewish camp.
They have a dam (beaver) and the underwater nymph population is non existent, unlike a mile downstream at the George Barthel memorial bridge between rte 55 and sportsmans road, which is teeming with nymphs, mayfly, stonefly, caddis and midge.
The explanation is beyond my knowledge but I think nyc has decreased releases and the dam has slowed the water.

While bug life dies a generous rock snot population has replaced it.
The fish I catch are universally underfed.

Thank u for taking the time to read this.

499) last week i seen 4-fawns laying on sides of lewis county rds.-one was close to jefferson county line-(hit by auto)-& all ya say, how theirs to many deer -fact is most deer hit are fawns,few adults hit-& last winter within two weeks on county rd. next to where i live ,two fawns hit-(eagles didn't waste em)-i wander about all rds. in rest of county &
others-----lastly- Don't ya think all dmp areas should be rifle banned -only legalize shotgun,muzzleloader,handgun & archery in just the dmp areas so as of last fall regulations only legal places w./rifle would be 6n (tug hill) & (adirondack park& adjasement)areas---

500) I'm an avid catch and release trout fisherman from Dutchess County and noticed that the streams local to me the Fishkill, Wappingers and sprout creeks were only stocked once this year! The DEC website says they would be stocked 3 times. Why just once? The streams were fished out quickly.
Sent from my iPhone

501) Every time humans stick their noses where they do not belong. Nature pays for it. EX. Bowfin in Baser Kill. They killed ever game fish in it. Ridgberry n.y. lake . A real mess. Just let nature rule the way and not an outsider !!

502) Very tasty too!

503) Are their any plans by the DEC to remove the old Springville NY power plant dam (cattaraugus creek) to allow
salmon and trout to run past this barrier ?

504) Hi,
The plan might be a good one,except it probably wont work. There is somewhat of a plan now, I think, and the hatcheries are supposed to follow it..
Like the stocking of trout in the Walloomsac River. Over 4k trout were stocked. When I checked the area I fish in the Walloomsac, I did not see one trout swimming or rising. The area is the Cotrell (sp) bridge ,just before the Vermont State line.
We all know how clean people are, there were no empty worm, or soda cans to be seen, and the brush wasnt beaten down....and I did not see one fish eating duck....
All I can say is I hope your new plan works better than the old one.

505) Should reevaluate the Connetquot River Locations of bubbles falls, and Rattlesnake Creek which used to be in better shape as well as producing good trout fishing.
Sent from my iPhone

506) To plans to make New York better place trying to be Bill Andre destruction certain places of that column Long Island and New York going to Suffolk County to be on we have our venture for the kingdom

507) ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails. ****(These were the only words on the email.)

508) My sole interest is to return a strong stream run of trout to Catherine Creek . Thank you

509) Can we get Whaley Lake stocked with trout and walleye?

510) Not necessarily a trout stream topic but kind of is. I really wish there was a plan to stock/re-introduce smelt back into the finger lakes as a food source for trout and in the spring they do swim up into the streams. I think the last time I caught a smelt was in the late 90's before zebra mussels.

511) I have been fishing streams around Albany for 40 years I would like to share my feeling about the situation