



Glenn Normandeau
NH Fish and Game Department
11 Hazen Drive
Concord, NH 03301

November 27, 2017

Proposed Magalloway River Rule Change

Dear Director Normandeau:

Native Fish Coalition of New Hampshire is opposed to the proposed rule changes on the Magalloway River. This river serves as an important migration corridor for wild native brook trout in the Lake Umbagog system, including the Dead Diamond River in the spring and fall, as well as critical winter habitat.

The Dead Diamond River is the finest “trophy” wild native brook trout fishery in New Hampshire, and recent studies have shown the brook trout are genetically pure. This is a unique and invaluable resource worthy of the highest level of protection.

The proposed rule change would allow anglers to use bait with barbless hooks from June 1 through Labor Day. While the intention is to allow anglers to target hornpout, brook trout will inevitably be inadvertently caught and subject to the well-documented roughly 20-30% incidental mortality rate associated with barbless hook bait fishing. That one out of three or four brook trout accidentally caught on bait will die due to hooking injuries is of great concern.

The current tackle restriction of artificial lures and flies only comes with an incidental mortality rate of approximately 3%. A change to allow bait would result in a sevenfold to tenfold increase in incidental mortality, which cannot be justified when you consider what is at stake.

While brook trout are less abundant in this stretch of river at this time than during other periods, we cannot guarantee they are not present, especially during cold weather periods and high-water events. This is especially true during early to mid June, and mid to late August when brook trout are moving into their historic spawning habitat.

Large wild native brook trout like those found in the Magalloway and Dead Diamond Rivers are rare in New Hampshire, especially in riverine environments. As stewards of the resource we need to look beyond the desires of a small group of anglers and protect these wild native brook trout, an invaluable resource and New Hampshire's official freshwater fish.

Sincerely,

New Hampshire Chapter of Native Fish Coalition



Attachment – Select Quotes from NH Fish and Game

“Once established as a wild brook trout management area, waters will have more restrictive regulations to protect the wild trout population.” (NH Fish and Game plan 2015 pg.61)

The Magalloway River harbors a wild native brook trout fishery. The protected regulations now in place are warranted.

“The most recent genetic assessment, done in 2012, identified unique populations in tributaries within Second College Grant and characterized the population within the mainstem and tributaries as patchy panmictic, meaning the genetic integrity of the population relies heavily on the drop downs from tributaries (S. Kelson, Dartmouth College, unpublished data). Management and protection efforts should focus on the entire watershed, not smaller sections or tributaries. These populations are thought to be native stock.” (NH Fish and Game Plan 2015 pg. 58-59)

The Magalloway River is an important part of the Second College Grant watershed. What happens there affects everything else to at least some degree.

“The agencies found that some individuals in the meta-population make extensive migrations, up to ~50 miles, during the year, and that these migrations are to locate specific summer, winter and spawning habitat. Individual brook trout leave the Dead Diamond Watershed, which is comprised of three HUC-12 watersheds, and enter the Magalloway River in Maine. Some individuals over-winter in Umbagog Lake, which is on the Maine and New Hampshire border. The summer migrations appear to be driven by high water temperatures, greater than 21°C for long periods.” (NH Fish and Game Management Plan 2015 pg. 55-56)

The above quote confirms that NH Fish and Game is aware that fish from the Dead Diamond River watershed utilize the Magalloway River at multiple, and critical, times of year to move throughout the system.

“Interest in wild trout fisheries is high as a survey of New Hampshire’s freshwater anglers found both resident (73%) and non-resident (79%) anglers support managing selected waters for wild trout only (Responsive Management 1996)”. (NH Fish and Game Plan 2015 pg.47)

Anglers of all types support the need to manage select waters for wild trout. The Magalloway and Dead Diamond Rivers and their tributaries are some of the finest in the state. Going forward with the proposed rule changes places a higher value on the desires of 21-27% of the angling community than it does the other 73-79%.