



**Native Fish Coalition**  
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February 1, 2021

Julie Moore, Secretary  
Vermont Agency of Natural Resources  
1 National Life Drive- Davis 2  
Montpelier, VT 05620-3901

Re: Reclassification of Alder, Blue Bank and Goshen Brooks

Dear Secretary Moore:

I am writing on behalf of Native Fish Coalition to comment on stream reclassification petitions for three brooks in the Towns of Ripton and Lincoln. These petitions originated in 2017.

Native Fish Coalition (NFC) is a non-profit conservation organization whose mission is to protect, preserve and restore native fish. NFC is a 501(c)(3) national organization with chapters in Vermont, Maine, New Hampshire, Massachusetts, Connecticut, Pennsylvania and Alabama. Brook trout are a focal species for Vermont NFC.

Native Fish Coalition supports the change from B2 to A1 classification for Alder, Blue Bank and Goshen Brooks. The classification criteria for aesthetics, biota and habitat are well documented and supported by this petition.

The coalition notes that A1 status for the three brooks is not sought based on fisheries criteria. Nonetheless, the petitioners have shown these intact brooks, in near-pristine condition, have natural habitat and aquatic biota that are vital to populations of native brook trout. Based on the habitat and biota criteria, and the protection granted to the fishery by an A1 classification, the coalition supports the three petitions.

Research by Native Fish Coalition documents the presence of wild native fish — brook trout — in each brook based on historic data. Electrofishing surveys by VT Fish and Wildlife Department for Goshen Brook indicates presence of wild native brook trout in 1967, 1997 and 2015. Brook trout were present in Alder and Blue Bank Brooks in 1967, the last known data collection there. It's likely, however, that remnant or better populations remain of wild native fish in these latter two upland streams.

The Agency is encouraged to approve the petitions. Thank you for the opportunity to comment.

Sincerely,

Chris Owen  
Vermont State Chair, Native Fish Coalition

CC:  
NFC Vermont Board  
Peter Walke, Commissioner Vermont Department of Environmental Conservation  
Bethany Sargent, Vermont Department of Environmental Conservation  
Pete LaFlamme, Vermont Department of Environmental Conservation  
Ethan Swift, Vermont Department of Environmental Conservation  
Eric Palmer, Vermont Department of Fish and Wildlife  
Mark A. Nelson, Ripton Conservation Commission