



## **POLICIES OF THE PENNSYLVANIA COUNCIL TROUT UNLIMITED**

These policies are recognized and approved by the PA Council of Trout Unlimited, and are meant to serve as broad guidelines for action as issues arise throughout the commonwealth. TU chapters should use these policies as guidelines for decision making and for taking action on local issues. These policies will be amended from time to time as future issues evolve.

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**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON ACID & MERCURY DEPOSITION**  
*SEPTEMBER 2007*

**P1**

It is widely recognized in the scientific community that both wet and dry acid depositions result from sulfur dioxide (SO<sub>2</sub>), carbon dioxides (CO<sub>2</sub>), mercury (Hg), and nitrogen oxides (NO<sub>x</sub>) emissions, and it is further recognized that over 90 percent of such emissions are man-made. It is well known that all areas of the United States are being negatively impacted by such deposition.

Although there has been some recent reduction in acid deposition in Pennsylvania and nationally since 1999, monitoring stations throughout Pennsylvania still reveal that the pH of precipitation (rain and snow) averages 4.1 - 4.4. This is many times more acidic than unpolluted precipitation. Pennsylvania produces in excess of 25% of its own acid deposition and is the second largest source of sulfur dioxide of all states.

The ability of a body of water to neutralize acid is called its buffering capacity. The buffering capacity is measured by a test called alkalinity and is expressed as parts per million (ppm) of calcium carbonate. Streams and lakes are considered vulnerable to acid deposition if base flow alkalinity values are 10 ppm or less. Using this criterion, there are many miles of wild, unstocked, poorly buffered trout streams in Pennsylvania that are susceptible to acid deposition. Additionally, about one-third of the 4480+ miles of stocked trout streams are vulnerable, as well as some lakes. Approximately 5% of Pennsylvania's streams are chronically acidified and about 35% are episodically acidified (U.S. EPA). These conditions have been recognized by many prestigious organizations, including the Acid Rain Foundation, Inc., Association for the Prevention of Air Pollution, Canadian Coalition on Acid Rain, Environmental Defense Fund, Audubon Society of America, National Clean Air Coalition, National Academy of Sciences, National Wildlife Federation, Sierra Club, Soil Conservation Society of America, Trout Unlimited and the Pennsylvania Fish and Boat Commission.

Pennsylvania Trout recognizes the degrading impact of acid deposition on all aquatic life in both cold and warm water habitats, as well as forests and crops. Our state fish, the eastern brook trout, is one of the most tolerant of chronic (persistent) acidic conditions. Therefore, other more sensitive coldwater species such as the mottled and slimy sculpins or certain sensitive aquatic macroinvertebrate taxa may be better indicators to judge these effects. However, all aquatic life can be devastated from just one episodic event.

Emissions from coal-fired power plants contain substantial quantities of mercury, which is then deposited into our environment. Mercury, which biomagnifies (accumulates) in fish tissue, has increased to the point where there is now a statewide public health advisory. There are an additional 77 specific water body advisories alerting anglers and their families to further limit their consumption of sport fish due to mercury contamination. A current list of consumption advisories can be found at [www.fish.state.pa.us](http://www.fish.state.pa.us), or in the PFBC Regulations Handbook.

To protect our environment, PA Council of Trout Unlimited recommends the following:

1. Strongly support provisions of the 1990 Clean Air Act Amendments to reduce sulfur dioxide emissions by 10 million tons from 1980 levels, placing a cap on the annual SO<sub>x</sub> emissions produced by utilities at 8.9 million tons by 2010.
2. Support provisions of the 1990 Clean Air Act Amendments to reduce NO<sub>x</sub> emissions by 2 million tons from 1980 levels by 2010.

3. Advocate for long term research to develop new technologies that further reduce NO<sub>x</sub> and SO<sub>x</sub> with an ultimate goal of zero emissions.
4. Advocate for stronger mercury emission controls at coal-fired power plants. Support legislative or regulatory initiatives that would achieve the maximum reductions in the shortest amount of time.
5. Support research and participate in projects to remediate problems in acid and mercury impacted watersheds.

**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON COOPERATIVE NURSERIES**  
**OPERATED BY TU CHAPTERS**  
*APRIL 2008*

**P2**

This policy establishes guidelines for the operation of trout nursery facilities operated by TU chapters in Pennsylvania. It applies solely to those facilities being used to raise fingerling-sized trout to catchable size, for release into streams in order to provide recreational angling opportunities.

The TU National policy on hatcheries and stocking is that they should only be used to restore wild fish populations. Trap-and-transfer of wild fish is considered to be the best way to re-establish wild trout populations, if no other source of wild trout is present in the immediate watershed.

PA Council recognizes the utility of hatchery trout for providing recreational fishing in marginal waters (those incapable of sustaining wild trout) in Pennsylvania.

PA Council also recognizes that hatchery fish released into streams containing wild trout populations is detrimental to the wild fish.

PA Council is especially cautious of the idea that streams containing a modest population of wild trout can be improved by adding stocked trout to bring the abundance up to some designated desirable level.

Financial support of cooperative nurseries that stock hatchery fish over wild trout or that violate any of the below listed principles is contrary to TU's conservation mission.

PA Council does not support the continued involvement by TU chapters with cooperative trout nurseries that do not conform with PA Council's stated Trout Management Policy and the PA Fish and Boat Commission's stated rules and regulations with regard to the stocking of trout in the Commonwealth's approved trout streams.

PA Council strongly opposes the establishment of any new trout cultural facilities in the name of Trout Unlimited.

**To best protect Pennsylvania's wild trout resources, while at the same time allowing the continued operation of its existing trout cultural facilities, PA Council of Trout Unlimited establishes the following set of principles for its chapters:**

1. Excessively warm and/or untreated or marginally treated nursery discharges should not be discharged into streams that support wild trout.
2. No more than a minimal amount of water should be removed from any stream that holds wild trout. In no case should so much water be diverted from a wild trout stream (in order to support the nursery) that the feeding stream is degraded.
3. PA Council does not support chapter-operated cooperative nursery facilities that stock in waters capable of sustaining wild trout.
4. Due diligence should be applied when making donations of TU monies to any club that is violating any of the above principles.

**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON FOREST PRACTICES**  
*MARCH 2007*

**P3**

Pennsylvania Trout recognizes that forested watersheds have a significant influence on our coldwater resources and that timber management practices play a major role in determining the health of our streams and rivers. Failure to employ good management practices, especially during timber harvest, results in many harmful impacts to our streams, rivers and their surrounding lands. These effects include soil loss, erosion and sedimentation, nutrient loss, elevated water temperatures, flooding and channel scouring. Recognizing that forest products are a significant component of the Commonwealth's economy, PA Trout does not oppose timber harvesting, but firmly believes that timber operations must be conducted under best management practices so that the health of our coldwater ecosystems is not impaired.

To ensure the protection of our coldwater resources, Pennsylvania Trout recommends these guidelines:

1. Environmental impacts throughout the entire watershed must be considered when timber harvesting is done, not just at the cutting area and its immediate environs.
2. PA Trout recommends the Commonwealth pursue the authority to require site-specific forest management plans for timber cutting operations, large and small.
3. Regulations to limit timber harvesting within riparian zones should be promulgated. The riparian zone is defined here as the streamside area extending 200 feet beyond the banks. When timber harvesting is done within the riparian area, special requirements must be met. They are:
  - (a) All shrub vegetation must remain undisturbed, and basal diameters must remain at more than 50 percent of the original stand.
  - (b) Entry to the riparian zone must be limited to a few specific locations.
  - (c) Timber harvesting must follow an erosion and sedimentation control plan approved by the County Conservation District, which will also do follow-up inspections.
4. Beyond the riparian zone, slopes making up the harvest area must receive special treatment:
  - (a) Cutting on forested slopes of 10 percent or greater and which comprise 30 percent of the harvest area must follow an approved erosion and sedimentation control plan no matter what the size of the area to be timbered;
  - (b) Cutting on all other harvest sites greater than 50 acres must follow an approved erosion and sedimentation control plan;
  - (c) Any party cutting on all sites greater than 250 acres must obtain an erosion and sedimentation control permit
5. Clear cutting of tracts is not desirable and "no harvest" protected zones should be maintained to help prevent soil erosion.
6. PA Trout strongly encourages all owners of forested lands to register in the Commonwealth Forest Stewardship Program; and, when allowing timber removal, to require the timber harvester to implement an erosion and sedimentation control plan.

7. Professional foresters should be sought to develop all timber harvest plans to protect watersheds and the interests of public or private landowners.
8. Each municipality is encouraged to enact an earth disturbance ordinance and to require permits prior to any logging activity.

**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON HAZARDOUS WASTE MANAGEMENT**  
*JANUARY 2007*

**P4**

The improper storage, transportation, treatment, and disposal of hazardous wastes within Pennsylvania pose a potential threat to human health and the environmental quality of the Commonwealth.

Pennsylvania Trout understands that Pennsylvania is responsible for the proper management of hazardous wastes consistent with our established goals for environmental quality, especially as these practices impact the Commonwealth's cold water resources.

PA Trout supports a comprehensive hazardous waste management strategy that is directed to such wastes within Pennsylvania including the types, quantities, and generators.

PA Trout adopts the following principles as policy guidelines in support of implementation of a responsible hazardous waste management plan:

1. Source reduction and recycling must be the primary focus of Pennsylvania's hazardous waste management scheme. Where not feasible, the following alternatives should be implemented:
  - Conversion to re-usable byproducts
  - Chemical treatment to render wastes non-hazardous
  - Thermal destruction
2. Land disposal of hazardous wastes shall not be considered as an acceptable alternative to the treatment/disposal methods outlined above.
3. An up-to-date, accurate assessment of the types, quantities, and production estimates of these wastes, by regions (identified as a percentage of the total of each type of waste) as well as available existing treatment/disposal capacity, should be conducted immediately and updated annually, to provide essential planning information before sitings of any new processing or disposal facilities are approved.
4. Pennsylvania has a responsibility to manage its own hazardous wastes. Management must comply with Commonwealth and Federal laws and regulations.
5. Proper management and disposal of hazardous wastes must address the following:
  - Potential toxicity of the wastes to be managed at the facility
  - Proposed air quality emissions
  - Disposal site design
  - Operational oversight
  - Current and future siting requirements
  - Transportation corridors
  - Spill prevention, mitigation and response, both on- and off-site.

6. Hazardous waste disposal or processing facilities can be sited only after citizen involvement in all phases of project development. Public need shall be firmly established for each proposed facility. The permitting agency must ensure that ample environmental impairment insurance and long-term facility bonding requirements are met.
7. A comprehensive hazardous waste management program must include a state-wide program to collect, process, and dispose of household hazardous wastes, thus assuring that they are not improperly disposed of in municipal landfills not designed for the disposal of such wastes.
8. Above ground long-term storage of hazardous wastes shall be prohibited.

**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON OIL AND GAS ACTIVITIES**  
*APRIL 2008*

**P5**

Pennsylvania Council recognizes that our water resources sustain all life and are important to human survival and well-being. Pennsylvania Council also recognizes that exploration and production of oil and gas are important to the economy of the Commonwealth. Historically, damage has been done to our surface and ground water resources by oil and gas exploration and production. Although more recently, laws and regulations have been adopted to prevent such damage, our legacy of over 150 years of drilling activity has resulted in the abandonment of pre-regulatory wells and production facilities that have a potential for polluting streams and aquifers.

Currently there are approximately 63,000 active oil and gas wells in Pennsylvania. An additional 6,500 wells have been registered by operators as orphans, and 2,100 abandoned wells have been identified by PADEP staff. Although PADEP has a program to plug orphan and abandoned wells, additional wells are being added to the inventory at a rate comparable to wells being plugged. The accuracy of the abandoned well inventory is questionable due to incomplete production reporting by operators. Present PADEP resources are not sufficient to accurately identify all abandoned wells or to plug all wells on the inventory within a reasonable period of time.

In recent years, due to the increased price of oil and natural gas, there has been a significant increase in the number of drilling permits issued. There is a correlation between the number of wells drilled and the number of complaints and incidents occurring. PADEP received 311 complaints regarding oil and gas activities during 2005. Twenty five of those complaints were related to surface water issues, such as erosion and sedimentation controls, spills, and other non-permitted discharges. While PADEP has increased staffing in response to the increase in drilling activity, no recent workload analysis has been done to determine current staffing needs.

Produced water, or brine, is usually a by-product of oil and gas production. Brine strength generally increases with the depths of the producing formations. Although sometimes considered a beneficial by-product and used for dust control on dirt and gravel roads or for snow and ice control on paved roads, it is more commonly disposed as a waste. There are 8 permitted brine treatment plants where brine is treated prior to discharge to a river or stream. There are 2 small treatment facilities where brine is discharged under a stripper oil well general permit. Brine disposal also is permitted at 26 disposal wells, 12 municipal sewage treatment plants, and 2 industrial waste treatment facilities. No discharges of brine are permitted to Exceptional Value or High Quality streams.

To ensure that Pennsylvania's water resources are not degraded by oil and gas exploration and production, Pennsylvania Council recommends the following policy guidelines:

1. All currently producing, plugged and abandoned wells should be inventoried and included in the Geographic Information System (GIS) inventory of the Commonwealth. PADEP should prioritize the abandoned wells for inclusion on the well plugging inventory, and explore additional alternatives, resource needs and strategies to assure that all problem wells are plugged as they are identified, and to assure that all wells on the inventory are plugged.
2. In order to fully accomplish its responsibilities for permitting, inspecting and otherwise regulating oil and gas exploration and production activities, PADEP should undertake a workload analysis to determine needed staffing resources.

3. PADEP should continue to prohibit surface discharges of brine into High Quality and Exceptional Value watersheds. PADEP should apply and enforce Chapter 93 water quality standards in all other watersheds where oil and gas development discharges are permitted.
4. Full-cost bonding should be required to ensure that all permitted wells, when production is suspended or terminated, are closed using the most current Best Management Practices (BMPs) in accordance with Commonwealth rules and regulations.
5. On Commonwealth-owned land, where Commonwealth agencies own the land in fee, oil and gas development should be prohibited in Exceptional Value watersheds and increased oversight should be applied in High Quality watersheds.

**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON RIPARIAN HABITATS**  
*JUNE 2007*

**P6**

PA Trout recognizes that riparian habitats, defined as the vegetative zones bordering streams and rivers, have important influences in maintaining good populations of trout and aquatic insects, and also provide many other significant ecological and cultural functions and values.

Many of Pennsylvania's riparian habitats have already been damaged and additional losses are threatened from urbanization; road construction; improper agricultural, lumbering and mineral extraction practices; and off-road vehicle use.

Vigorous natural riparian vegetation is so closely integrated with the healthy functioning of streams and floodplains that explaining all the complex interactions is beyond the possibilities of this short document. The following are just some of the widely recognized functions and values of riparian habitats.

1. Trees and shrubs provide shade, maintaining cool water temperatures.
2. Roots of riparian vegetation bind soils and sediments near the stream edge, limiting bank erosion. This reduces channel widening and the influx of sediment into streams. During floods, the roots of riparian vegetation further back across the floodplain also reduce soil erosion from the top of the floodplain (floodplain stripping), also reducing the influx of sediment into streams.
3. Escape cover for fish is provided by undercut roots along the banks, overhanging branches, leaning trees, and downed trees (large woody debris) in the channel.
4. Pool formation is triggered by interactions between stream flow and leaning and fallen trees (large woody debris). Trout populations are closely linked to the quantity and quality of pool habitats.
5. During floods, riparian vegetation obstructs and slows high velocity flows, dissipating their energy through friction. This limits damaging scour. Along channel edges, the water is slowed by contact with roots, limbs of overhanging bank vegetation, and leaning trees. In mid-channel areas, downed trees (large woody debris) slow the water's velocity. A similar process occurs on the floodplains during floods. Both standing and fallen vegetation obstructs and slows the floodwaters.
6. During floods, riparian vegetation also induces the deposition of fine sediments, building up rich floodplain soils, and reducing instream deposition of fine sediments that cover important aquatic habitat and trout spawning areas.
7. Riparian vegetation promotes water quality protection by helping to capture polluted runoff and sediments from adjoining agricultural and developed lands.
8. Plant parts such as leaves, seeds, flowers, twigs, and branches that fall into the stream (allochthonous organic matter) are a very important part of the aquatic food chain, particularly in headwater streams.

9. Naturally vegetated riparian habitats absorb floodwaters, reducing downstream property damage, and recharging floodplain aquifers.

10. Naturally vegetated riparian zones provide habitats for a wide variety of life, including rare and endangered species. Riparian corridors typically have a higher number of plant and animal species than any other part of the landscape.

11. Riparian zones are also valuable for recreation such as fishing, hunting, camping and hiking.

**It is the policy of PATU to protect, conserve and restore natural vegetative stream buffers of sufficient width to protect stream ecosystems. PA Trout therefore recommends the following:**

1. Stronger regulations and strict enforcement are needed for the preservation and protection of riparian habitats. Pennsylvania should enact a riparian buffer law to prevent the destruction of riparian buffers along streams.
2. Streambank fencing programs to protect riparian zones from overgrazing by cattle, accompanied by revegetation through natural regrowth and native tree and shrub plantings, are very beneficial, and should be supported and expanded.
3. Streamside lawns should be converted to natural riparian vegetation wherever possible, especially on public land.
4. Where developments such as parking lots, structures, and roads occupy riparian areas, restoration to natural vegetation should be carried out where feasible. We understand that in many places economic constraints will limit this type of restoration of riparian areas. But there are places where, for economic, public safety and environmental reasons, infrastructure should be moved to higher ground and out of the path of floodwaters.
5. For long-term conservation of riparian lands, programs that promote the acquisition of streamside buffers with willing landowners through easement or purchase should be encouraged.
6. Managers of public resource lands, such as state forests, state parks, state gamelands, and the Allegheny National Forest, should take particular care to maintain and restore the integrity of riparian areas and utilize their lands to showcase exemplary streamside vegetative management.
7. Further research is needed to understand how best to restore and conserve riparian habitats.
8. Educational efforts are needed to inform Pennsylvanians of the importance of riparian habitats.
9. Because the influences of riparian vegetation extend beyond the streambank area, extending far across the floodplain, riparian management zones that are very wide (optimally the full width of the floodplain) should be highly favored over narrow buffer strips. A narrow riparian buffer is preferable to no buffer, but will not provide full benefits to the stream environment.
10. TU members should report any damage to riparian areas due to development, highway construction, recreation, timbering, mining and agricultural practices to the proper enforcement agency.

**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON STREAM CHANNELIZATION**  
*JANUARY 2007*

**P7**

Channelization, sometimes referred to as dredging, has a long history in PA, extending from the early colonial period right up to the present. The damage done to streams has been immense. Channelization eliminates complex stream features such as high quality pools, overhead cover and spawning areas. It results in wide, shallow, ditch-like channels that eliminate or reduce trout and other aquatic populations. Many streams that were channelized over a century ago have not yet recovered their normal structure.

Stream channelization refers to several types of channel modifications, usually done in an effort to provide flood protection. Channelization is intended to move floodwater more quickly downstream. The goal is to prevent streams from spilling over their banks onto their floodplains during high water flows. This is usually done in an attempt to protect manmade developments, including buildings and roads that have been built in floodplains.

Stream channelization may reduce or prevent localized flood damage; however, it has negative impacts on the stream environment. The spilling of streams onto their floodplains is a natural event. Stream channelization creates a false confidence and leads to increased pressure for development in flood-prone areas. To the extent that channelization is successful in keeping water out of the floodplain in a localized area, flood damage is almost certain to be increased downstream. The increased volume and velocity of water downstream exacerbates flooding and erosion; threatening homes, businesses, bridges and roads.

Stream channels are typically widened and/or deepened by moving heavy machinery directly into the streambed. Stream substrate and gravel bars are commonly dug out and removed. Stream banks are often excavated to widen the stream channel. Natural meanders are usually straightened in the process and boulders and woody debris removed. Stream banks are often lined with rip-rap, gabions, or even concrete, to prevent streams from readjusting to their natural channel form. All of these in-stream activities destroy food and cover for coldwater species.

The clearing of trees and shrubs from adjacent floodplains further damages streams and their riparian corridors. Removing riparian vegetation and the shade it provides increases water temperature. The lack of woody debris created by removal of streamside vegetation eliminates important elements of the trout food chain as well as cover for the fish.

Floodplains occupy only a small percentage of Pennsylvania land, but they are vital in maintaining water quality and the survival of the biota of streams and their riparian areas. Floodplains are in fact part of a river's bed and naturally transport a portion of a river's volume during intermittent high flow periods. As long as building in floodplains is allowed to continue, flood damage will increase and property owners will continue to exert political pressure to channelize streams. There are no federal or state statutes prohibiting building in floodplains.

Therefore the PA Council of Trout Unlimited recommends that the following be implemented by local, state and federal agencies to eliminate unacceptable channelization practices:

1. Channelization practices need to be greatly reduced or, ideally, eliminated in their entirety.

2. Environmental assessments should be conducted prior to the issuance of any permits for stream channel or floodplain modifications.
3. The Commonwealth of Pennsylvania must be encouraged to develop laws and regulations to discourage, and ultimately eliminate, development on floodplains.
4. The public is encouraged to promptly report channelization activities to their county conservation district, PA Fish and Boat Commission regional office or PA DEP regional office, in the event that enforcement action is needed. Those engaged in unpermitted channelization practices must be held responsible for the financial cost of restoring the natural habitat features.
5. New and replacement bridges and culverts should be adequately sized and designed to allow passage of flood flows and debris without the need for channel alterations.
6. On public resource lands, such as national and state forests, state parks, state game lands, PA Fish & Boat Commission properties, and county and municipal park lands, channelization should be prohibited in its entirety. Managing these public lands in ways compatible with maintaining healthy streams and riparian ecosystems would serve as an example for good land management on private lands.
7. Educational programs must be developed to inform all Pennsylvanians about the functions of stream and riparian ecosystems, the effects of stream channelization, the laws in place protecting against encroachment, and the consequences of breaking these laws.

**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON SURFACE MINING & MINE RECLAMATION**  
**(Coal & Non-Coal)**  
*JANUARY 2007*

**P8**

The water resources of Pennsylvania are essential to sustain aquatic life, wildlife, human health, enterprise and recreation. Over the years, mining has caused major damage to the waters of the Commonwealth. This includes over 2,500 miles of streams polluted by abandoned mine drainage (AMD). Our legacy from well over 100 years of mining activity is many miles of mine drainage polluted surface waters that support little or no aquatic life and numerous polluted aquifers. This polluted water costs the citizens of Pennsylvania millions of dollars for home water treatment and lost revenue from tourism. It also discourages development because many areas have no usable water without costly treatment. Many of these discharges can be treated and the watersheds restored.

Mining of coal and other mineral resources is an important aspect of the economy of the Commonwealth but it must not occur at the expense of healthy coldwater resources. Therefore, PA Trout supports the following:

1. No further degradation of the Commonwealth's water resources from mining should occur.
2. Mining should be prohibited in certain watersheds.
3. Regulatory agencies should use the best and latest technology for predicting and safeguarding against post-mining threats to water quality; including acid mine drainage, erosion, sedimentation, thermal impacts and loss of surface and ground waters.
4. All regulatory agency offices must be consistent in the strict application of criteria for evaluating mine permit applications and monitoring the performance of mine operators.
5. Mining operations should be rigorously monitored and enforced for regulatory compliance.
6. Bonding levels must be adequate to ensure treatment of any discharges that may threaten future water quality in the event of non-compliance or company bankruptcy.
7. If an unexpected discharge should occur on a mine site, remediation measures should be immediately taken to reduce the impact of the discharge.
8. Soil additives and amendments are often used to address acidic mine discharges and acidic overburden. These include coal combustion wastes, biosolids from sewage or industrial processes, incinerator ash, and harbor dredgings. The public must have the opportunity to participate in the decision-making process concerning the use of these materials. Long term monitoring should ensure that the amendments pose no water quality threats.
9. AMD discharges should be addressed on a watershed basis and should employ multiple partnerships to assist in the restoration of these watersheds.
10. Development of additional sources of permanent financing for construction, operation and maintenance of existing and future treatment systems and for other activities necessary for watershed restoration.

**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON TROUT MANAGEMENT**  
*SEPTEMBER 2007*

P9

Pennsylvania's 10,000 plus Trout Unlimited members regard trout, salmon, and their habitats as their badge of identification. Their interests are broad enough to embrace all aspects of aquatic ecosystems: water quality, water quantity, acid precipitation, influences of forestry and agricultural practices, point and non-point sources of pollution, wetlands, riparian corridors, land use and management practices, stocking policy, regulations to restore wild trout populations and all other related factors which affect salmonid populations and the waters they inhabit.

For these reasons, the long-term goal of PA Trout – A State Council of Trout Unlimited – is the following:

**Preserve and enhance wild trout populations, coldwater habitat and diverse recreational angling opportunity for wild Pennsylvania salmonids.**

This goal establishes a broad foundation for developing future policies, actions, and recommendations by PA Trout. In order to achieve this goal, PA Trout has adopted the following, which more explicitly sets forth the policies of this organization regarding trout fisheries throughout Pennsylvania.

**Policy #1 - Wild Trout**

Protect, restore and enhance wild trout stocks and promote self-sustaining populations wherever possible.

**Policy #2 - Native Brook Trout**

Brook trout are Pennsylvania's only native stream-dwelling salmonid. Protecting existing native populations requires special considerations and management policies to assure healthy and sustainable populations of this species.

**Policy #3 - Coldwater Habitat**

Habitats currently providing healthy, wild trout populations should be protected from degradation. They should be restored and improved in those situations where they have been degraded. The aquatic biota of coldwater ecosystems should be conserved, adequate water quantity and quality assured, and environmentally sound land use fostered on a watershed basis.

**Policy #4 - Hatchery Trout**

Hatchery-reared trout provide valuable recreational fishing for Pennsylvania anglers. Adult-sized hatchery trout should be stocked only in those waters in which such stocking will have no detrimental effect on existing wild trout populations or the ability to restore wild trout populations. Streams should be stocked with hatchery trout only if it has been determined that such streams are unable to support self-sustaining wild trout populations.

These guidelines should apply to all stocking programs including cooperative nurseries and private stockings within the Commonwealth. Fingerling stocking is preferable to 'put-and-take' stocking in situations where natural reproduction cannot be sustained because of limited or non-existing spawning habitat but where conditions are otherwise suitable for sustaining year-round trout populations.

**Policy #5 – Overharvest**

Notwithstanding the inherent natural annual variability of wild trout populations resulting from climatic fluctuations and other environmental insults, Pennsylvania trout considers over-harvest an impediment to increasing the size and numbers of wild trout in Pennsylvania. Accordingly, trout management programs should be instituted to reduce harvest of wild trout and minimize hooking mortality.

**Policy #6 - Stream Assessment**

Scientific management of Pennsylvania's trout waters should be based on the individual assessment and evaluation of each waterway. Knowledge of the resource and its potential is essential to a scientifically justified management program. Every stream should be evaluated, classified, and periodically reviewed to determine measures appropriate for improving the standing stocks of wild trout. This assessment should also measure the overall health of coldwater habitat and the condition of the ecosystem throughout the watershed. Staff and equipment should be enhanced to insure that these assessments can fully and adequately be conducted.

**Policy #7 - Stream Access**

Access to trout waters on both public and private property is necessary for the public to enjoy trout fishing and central to the management of trout water throughout Pennsylvania. Trout management, watershed improvements, and land conservation policies should encourage both acquiring public lands and fostering partnerships with landowners, local governments, conservation organizations and others to promote increased public access to designated trout waters.

**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON WATER WITHDRAWAL**  
**AND INTER-BASIN WATER TRANSFER**  
*APRIL 2008*

**P10**

Clean water in abundance is vital to aquatic and wetland communities and their inhabitants, including fish, wildlife and plants.

Pennsylvanians depend on clean and abundant water resources for industry, commerce, agriculture and everyday life activities.

Pennsylvania has been blessed with an abundance of surface and ground water, but has squandered its water resources through neglect, abuse, and the failure to consider water as both a public resource and a critical ecosystem essential. Since all waters of the Commonwealth are hydrologically interconnected, and the health and welfare of Pennsylvania's citizens, economy, and natural resources depend upon both the quantity and quality of our water, PA Council holds the following official policy on water withdrawals and inter-basin water transfers:

1. Water resources shall be managed on a watershed and regional basis. All efforts shall be directed to maintaining and improving water quantity and quality within a watershed.
2. Transfers between watersheds shall be limited. These transfers defeat the objective of using watersheds as hydrological units and negatively affect aquatic ecosystems and the natural diversity of both the donor and receiving watersheds.
3. There shall be a complete inventory and assessment of all Commonwealth water resources. This shall include surface waters; ground water systems including recharge locations, recharge amounts, discharge amounts and withdrawals, and watershed land uses. The goal for the inventory shall be a database for decision making designed to conserve aquatic ecosystems and natural diversity while providing for other water uses.
4. Cumulative effects of all water users within a watershed unit and the general condition of a watershed unit shall be considered before permitting decisions are made.
5. Water withdrawals from both surface and groundwater sources shall be limited to ensure that surface water flows are adequate to protect aquatic ecosystems and natural diversity. Consumptive water users, including golf courses, bottled water companies, power plants, municipalities, agricultural and industrial users, shall be regulated to achieve this goal. The primary objective is to maintain stream flows at levels that will not negatively affect aquatic ecosystems and natural diversity. If measurable degradation occurs, the Commonwealth must hold all those exceeding their allocations accountable.
6. Water conservation shall be enforced by permitting; and, as currently required, all water users exceeding a withdrawal of 10,000 gal./day, must report their water consumption to the PA Dept of Environmental Protection. Water taken by municipal water systems shall be minimized and enforced at a twenty percent or less level.

7. Emphasis shall be placed on optimizing groundwater recharge, particularly in urban areas. Expansion of impermeable surfaces shall be discouraged and permeable surfaces shall be used where supported by sound engineering practice. Where necessary and feasible, impermeable surfaces shall be replaced by permeable surfaces.
8. New standards for conservation and construction for private water wells shall be developed and enforced.
9. Industrial users of water shall be permitted only for closed loop systems, thereby eliminating water withdrawals and net losses to the water reserve.
10. There shall be a public education process, including schools and adult education, with the goal to develop a broad base of citizen support for water resource conservation and enhancement.

**PA COUNCIL OF TROUT UNLIMITED**  
**POLICY ON WETLANDS**  
*JANUARY 2007*

**P11**

Pennsylvania's landscape is composed of less than two percent (498,000 acres) of wetland habitats. Substantial loss of these habitats has already occurred and additional losses are threatened by land use activities such as increasing urbanization; road construction; improper agricultural, lumbering, and mineral extraction practices; certain recreational activities; and conversions of wetlands to deepwater habitats (lakes and ponds).

Wetlands are areas inundated or saturated by surface or groundwater at a frequency and duration sufficient to support vegetation adapted for life in saturated soil conditions. Commonly known as bogs, marshes, seeps or swamps, many (perhaps most) wetlands are adjacent to or hydrologically connected to streams, rivers, ponds or lakes. Other wetlands, called isolated wetlands, are seemingly not connected to waterways. Wetlands provide critical functions and values to Pennsylvania's citizens and aquatic ecosystems and biodiversity including our coldwater fisheries resources.

The widely recognized functions and values of wetlands are to:

1. Deter erosion and sedimentation.
2. Buffer point and non-point sources of pollution.
3. Absorb and mitigate potential floodwaters.
4. Store snow melt and rainwater which discharges into streams and helps to maintain base flow.
5. Provide habitat for a rich diversity of vegetation and wildlife including rare, threatened and endangered species.
6. Provide organic materials to waterways which are especially important in infertile headwater streams.
7. Provide cover for fish and other aquatic organisms.
8. Provide shade to maintain cooler water temperatures.
9. Have scenic beauty, aesthetic and heritage values and serve as focal points for a variety of outdoor recreation, education and scientific research.

To ensure that wetland habitats receive the preservation and protection merited by their functions and values, PATU recommends the following policy guidelines:

1. Appropriate Commonwealth agencies shall be encouraged to develop stronger regulations to preserve and protect wetland habitats.
2. Any existing regulations or new regulations developed to preserve and protect wetland habitats must be strictly and equitably enforced statewide.
3. Any wetland disturbances should be reported to appropriate authorities.
4. Research projects on wetland habitat functions, values, preservation and protection shall be developed and supported.

5. Commonwealth agencies and other government entities shall be encouraged to develop and implement high quality educational programs to inform the citizens of Pennsylvania about the importance of wetland habitats and how best to protect and enhance them.
6. Wetland encroachment permits should be issued only for unavoidable impacts.
7. Highest quality wetlands must receive the highest level of protection in the permitting process.
8. A periodic review by a qualified independent entity should be conducted on the Commonwealth's wetland banking program.
9. Mitigation must only be used to reduce unavoidable impacts and ideally should result in a net gain.
10. Special attention shall be given to the prevention of adverse cumulative effects of wetland losses in any given watershed.
11. Commonwealth agencies and conservation organizations should be encouraged to purchase or acquire easements on wetlands.