



Uniting Citizens to Conserve, Protect and Enhance Michigan's Natural Resources and Outdoor Heritage  
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November 4, 2021

RE: Amendment to Fisheries Order 200.22

Dear Chairwoman Rose and Natural Resources Commissioners:

I am writing on behalf of the MUCC Fisheries Committee with concerns regarding the recent amendment to Fisheries Order 200.22 put forth by NRC Commissioner Nyberg with regards to steelhead bag limits on certain waters. While MUCC does not have a resolution on this specific issue, we have traditionally opposed a reduction in bag limits unless there is sound scientific evidence to support it.

While the committee supports commissioners having the autonomy to propose amendments to orders, this specific amendment raises questions on stakeholder input and a defensible scientific management decision. Traditionally, changes to species bag limits have gone through a process that includes the citizen's fisheries advisories committees, and various other committees and forums that allow for discussion and public input — why this amendment seeks to circumvent that process has not been made clear.

The MUCC Fisheries Committee recognizes that diminished runs and lower steelhead recruitment are more than just anecdotal evidence. However, several state fisheries biologists have indicated that there is currently no definitive answer as to why the population is declining.

Currently, the DNR has ongoing studies looking at steelhead modeling and recruitment, specifically in Lake Michigan and its tributaries. Ultimately, the lack of conclusive data about what is causing reduced steelhead runs is what is most alarming with this sudden amendment. Is this reduction in bag limit urgent enough that it can't wait until the results from these studies are produced or until new research is conducted to definitively point to what is causing the population decline?

***Data collection needs to be a top priority of any steelhead regulation moving forward.*** When challenged with difficult management decisions, the commission should be armed with the data necessary to make decisions for the betterment of our fisheries and resources.

At the time of this writing, the DNR has not officially been on the record regarding this amendment. Many stakeholders are eagerly awaiting to see what information the fisheries division will provide, and that should help the public and commissioners moving into the December NRC meeting.

While MUCC currently has no official position or policy resolution for this amendment, changes to fish and game laws need to be based on sound science. In this instance, the data in tandem with stakeholder and public input is severely lacking.

The MUCC Fisheries Committee hopes that due diligence will be done before any changes are made to the bag limits and that regulations are consistent with Proposal G.

Sincerely,

Tim Muir  
Vice-President, Michigan United Conservation Clubs  
MUCC Fisheries Committee Chair