

December 3, 2021

RE: Amendment to Fisheries Order 206.22

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 206.22 with regards to a year-round walleye season on the Lower Saginaw River. The amendment was put forth by NRC Commissioner Cozad.

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 regulations 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.

The MUCC Fisheries Committee feels there is not enough data to answer several key questions regarding present fishing effort, changes in catch rates and how this regulation change might affect both of those.

DNR data shows that catch rates in the Saginaw Bay watershed declined in 2020 for walleye. In 2021, according to preliminary data, catch rates will be lower than 2020 — indicating a two-year decline in catch rates.

Angler success and perceptions will be imperative to ensuring support for this type of regulation. With two years of declining catch rates, the majority of anglers surveyed by the DNR against this change and presumably lower angler satisfaction numbers, how will the Natural Resources Commission sell this regulation to anglers?

The MUCC Fisheries Committee is also concerned with the effects the dam failures in 2020 are having on the watershed. With the failure still very recent, the committee feels more time and effort needs to be put into ensuring that our river ecosystems are as fertile for fish populations as they were before the catastrophic event.

Despite the DNR having data on Saginaw Bay and its tributaries, there are too many unanswered questions to make this significant change on a short timeline. The committee would prefer to see at least a one-year delay on this amendment in order to better understand the downward trending catch rates and what, if any, impact the dam failures had on the fishery.

While MUCC currently has no official position or policy resolution related to this amendment, this amendment is expected to be a topic of conversation at MUCC’s December 4 Conservation Policy Board meeting, where a formal resolution could be introduced.

Changes to fish and game laws need to be based on sound science. In this instance, the downward trend of catch rates signals that this is not the time to open up more harvest of walleye. Selling this to the angling public at a time of declining catch and on the heels of dam failures that likely changed the rivers’ ecosystems will be arduous, and it is not something the MUCC Fisheries Committee can support.

Sincerely,

Tim Muir

*Vice-President, Michigan United Conservation Clubs*

*MUCC Fisheries Committee Chair*