

Lake Michigan Integrated Fisheries Management Plan

2017-2026



Administrative Report No. 80

Supplemental Appendix
Responses to Comments on Draft Plan

Lake Michigan Fisheries Team
Bureau of Fisheries Management
Wisconsin Department of Natural Resources

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Responses to Comments

A Public Discussion Draft of the Lake Michigan Integrated Fisheries Management Plan was circulated for public comment. Comment period was from July 15, 2014 to October 31, 2014 and included four public meetings: August 2, 2014 in Green Bay, August 5, 2014 in Cleveland, August 7, 2014 in Milwaukee, and August 7, 2014 in Peshtigo. The comments that we received were reviewed by the Lake Michigan Fisheries Team. Some comments resulted in changes to the Plan, others did not, and all were considered. The following summary re-states all comments that we received and identifies the stakeholder that provided the comment, followed in each case by a response. The numbers after each comment refer to the individual or group who made the suggestion (see the list following this summary). In some cases comments where we received a large number of similar comments, the comments were grouped and general summaries were provided.

Vision I. A diverse, balanced and healthy ecosystem

Bait Regulations

Comment: Use of various minnows in Lake Michigan should be allowed again with restrictions on not removing them from the shoreline – 2

WDNR Response: *Anglers can use minnows purchased from a license bait dealer to fish Lake Michigan. Currently it is illegal to harvest minnows from Lake Michigan and other VHS positive or suspected positive waters due to risk of spreading diseases (e.g., VHS) and invasive species. Invasive species and diseases could have drastic effects on fish and other aquatic organisms in Lake Michigan and other waters.*

Cisco

Comment: Restoring Cisco has some potential impacts that may not be beneficial. Common knowledge among older commercial fishermen is that cisco hurt whitefish recruitment – 17

WDNR Response: *WDNR will review previous research, historical information including observations from commercial fishers and work with stakeholders before deciding on support for reintroduction of cisco.*



Responses to Comments (cont.)

Comment: Cisco goal should include the potential for a commercial harvest when restored – 17

WDNR Response: *The ultimate population and fisheries goals will be determined after feasibility research is completed and stakeholders engaged on this issue. At this point, it is uncertain as to whether we will pursue restoration and it would be premature to set ultimate fisheries goals.*

Cormorants

Comment: Cormorant control – should consider controlling cormorants off NE Door County. This is where the cormorants end up when you control them elsewhere. These might be having an effect on Mink River Estuary and the whitefish distribution around Moonlight Bay – 17

Comment: Consider other cormorant populations in state especially Racine and Kenosha and Manitowoc – 41, 95, 96

Comment: Look into other methods of reducing the number of comrades – 19, 83

Comment: I am concerned with the cormorant population in Lake Michigan waters in Wisconsin. Why doesn't WI adopt cormorant control practices like the state of Michigan (shoot cormorants) – 41

WDNR Response: *WDNR endorses a cormorant population control plan initiated by USDA in 2007. This cormorant control plan established nesting goals and egg oiling and lethal treatments are used to achieve these goals. Any changes to the control program proposed by WDNR would have to be approved by applicable Federal agencies. See Vision I, Goal C, Objective 1, Tactics d-e.*

Ensuring a healthy ecosystem

Comment: The Plan fails to offer specificity either in process or in expected timeline. The Plan is a long-term planning tool, and as such should include benchmarks of success and timelines - 58

WDNR Response: *The level of detail suggested in this comment is beyond the scope of this plan. This plan is intended to broadly set our focus to manage Lake Michigan fisheries resources.*

Comment: The plan should include climate resilience in its habitat restoration and enhancement strategy - 58

WDNR Response: *When WDNR works on applicable tactics, all information related to habitat including climate issues will be a part of the solution.*

Comment: The commitment to public access sites should include a maintenance plan - 58

WDNR Response: *WDNR property access sites are maintained through property management plans and the State biennial budget process.*

Comment: The Department should incorporate its reviews of water conditions and aquatic structures into permitting and re-permitting processes - 58

WDNR Response: *This is already being done and part of this plan. See Vision I, Goal A, Objective 2.*



Responses to Comments (cont.)

Comment: The plan should include more emphasis on the impact of nonpoint source pollution on fish and their habitats in tactics - 58

WDNR Response: *As written, this plan contains a strong focus on addressing the fisheries impacts of non-point source pollution. See Vision I, Goal A, Objective 3, Tactics a-f.*

Invasive species

Comment: The plan should be specific regarding its support of methods to prevent the introduction of invasive species - 58

WDNR Response: *The level of detail suggested in this comment is beyond the scope of this plan. This plan is intended to broadly set our focus to manage Lake Michigan fisheries resources and includes minimizing introductions of new invasive species. See Vision I, Goal C, Objective 2.*

Comment: The decision-making relating to the tradeoff between invasive species and removal of barriers should be outlined in the Plan. The Plan references a tradeoff between risking proliferation of invasive species and removal of waterway barriers to improve access for fish migration, but does not explain how that risk will be evaluated. A tactic should be added that outlines how the risks are evaluated and what steps will be taken to reach a decision on each barrier removal.

WDNR Response: *See Vision I, Goal A, Objective 6, Tactic c which calls for development of a Department fish passage policy. Evaluation of invasive species and disease risks associated with fish passage or barrier removal will be a component of a Department fish passage policy. Development of such a fish passage policy is beyond the scope of this general fisheries plan and will be a separate effort.*

Comment: The plan should include a provision for their commitment to strengthening ballast water discharge regulations.... In order to take more immediate steps to reduce this risk, we strongly encourage Wisconsin to adopt rules that require all vessels, oceangoing and freshwater, to have a permanent ballast water treatment system such as the one used on the Ranger III at Isle Royale National Park. This treatment system, developed by scientists at Michigan Technological University and Hyde Marine, uses ultraviolet light to filter and kill organisms in the vessel's ballast water. Another option is requiring onshore treatment of ballast water in facilities similar to sewage treatment plants. Eight scientists on the EPA's panel of scientists stated that this type of onshore treatment can reduce living organisms (10 to 50 microns and larger in size) by at least 30,000 times. This is compared with the 50-300 times reduction that the new EPA permit, requiring ocean freighters visiting all U.S. ports to install ballast disinfection systems, will produce.⁷ We urge Wisconsin to explore this option and consider it as a requirement for vessels entering Wisconsin ports in Lake Michigan. We encourage the inclusion of a tactic or objective that outlines the commitment of the Department to exploring such options and strengthening Wisconsin's ballast water discharge standards, rather than solely relying on the creation of a new legal authority to do so. - 58

WDNR Response: *The Plan (Vision I Goal C Objective 2 Tactic a) supports ballast water control. To achieve effective ballast treatment, bi-national (US and Canada) regulation and enforcement is needed rather than individual jurisdictional regulations.*



Responses to Comments (cont.)

General Statements

Comment: NR 1.04 (3) should be guiding scope before any new species is stocked into the lake-47

WDNR Response: *We agree and follow this practice using sound science to make decisions; The referenced code language - “Management of the fishery resources shall be based on a sound understanding of the dynamics of interacting fish stocks. The department shall conduct research and resource base, inventories, and collect harvest and utilization statistics on which to base sound management decisions.”*

Comment: If we introduce new stock it should be fit for human consumption - 47

WDNR Response: *Comment noted.*

Comment: NR 1.04 (4) should be used more fully, smelt stocks are down - 47

Comment: Restore smelt - 54

WDNR Response: *At this time the Department will not be pursuing restoration of smelt populations. Smelt populations are at the lowest levels since original invasion into the Great Lakes. However, it is not known why smelt populations are so low but likely due to changing availability of planktonic prey. We do not know if smelt restoration is possible and it would require substantial resources to research the mechanisms and the feasibility for restoration. With our budgetary and staffing resources limited, smelt restoration is not a priority. In addition, we do not know if it is ecologically or socially desirable to restore smelt populations. Smelt have been utilized by both commercial and recreational fisheries and provided forage for large gamefish. However, smelt are a non-native species that have impacted native fish populations through direct predation on young fishes.*

Comment: Document should be reviewed by legislative review committee in that it fails legislative intent – 47

Comment: NRB should also review the documents mission to preserve and enhance Lake Michigan stocks both predator and prey - 47

WDNR Response: *We have an approval process for this document that includes the Fisheries Management Board, Division Director, and DNR Secretary.*

Comment: Quit talking and start taking some action to stop the Asian carp from moving into Lake Michigan from the Chicago waterway - 88

Comment: Maintain Chicago Asian carp barrier to protect Lake Michigan Fishery – 95, 96

WDNR Response: *This plan supports Asian carp control (Vision I Goal C Objective 2 Tactics b and d). This barrier is located outside the State of Wisconsin but the Governor and Attorney General are reinforcing our concerns to the Federal government agencies and neighboring States.*



Responses to Comments (cont.)

Comment: Find a way to improve or possibly build a new boat launch at Harrington State Park in Ozaukee County - 88

WDNR Response: *The Harrington State Park master plan does not call for fishing pier/boat launch improvements. The plan specifically states that this would “require extensive modification to the existing near shore area. A protective harbor would be required to provide quality access to boats. Fishing piers or similar structures also would require a major undertaking.” There are harbors and piers both in Port Washington, to the south, and Sheboygan, to the north.*

Comment: Work to remove the dam in downtown Grafton Mill pond – 88

WDNR Response: *WDNR provides information to dam owners on the feasibility of options but we do not advocate dam removal or repair.*

Comment: File suit against the Milwaukee Metropolitan Sewerage District for dumping all of the contaminated wastewater. Force them to separate the sewer wastewater and storm sewer water – 88

WDNR Response: *This comment is beyond the scope of this Plan.*

Comment: Your report/ plan has lofty goals (perhaps far too many) but has been a horrible failure in practice. Poor salmon and trout fishing in southern waters in 2014 – 91

WDNR Response: *Thank you for your comments. However, our data indicates that salmon and trout catch was down throughout Lake Michigan in 2014 and 2015 but increased in 2016. Anglers have generally enjoyed good fishing success in the last 10 years with some of the highest historical catches of chinook salmon happening during this time.’*

Vision I, Goal A

Comment: Vision I, Goal A, objectives 1, tactic b – Milwaukee River mention should be removed – 47

WDNR Response: *This has been removed in favor of developing comprehensive tributary fisheries management objectives and goal. See Vision II, Goal C, Objective 2. Habitat work, species restoration, etc. will be part of overall tributary management plans to achieve specific tributary fisheries goals and objectives.*

Vision I Goal B

Comment: Vision I, Goal B, Objective 2, Tactics b and c should be removed – 47

WDNR Response: *Those tactics have been moved, see Vision II, Goal C, Objective 2.*

VISION Statements

Comment: Re-order Visions I. Science II Effective Communication III Multispecies sport fish IV Commercial V Balanced Ecosystem (exact order is not right, LK made a mistake, point is to put Science first – 47

WDNR Response: *Comment noted. However, Vision order in the plan does not represent priority or importance of each Vision.*



Responses to Comments (cont.)

Goal A

Comment: Goal A Objective 6 Tactics A-H – Could we add a tactic I that says the WDNR will work with non-profit and other organizations to improve fisheries to maximize efforts and minimize costs (use the volunteers). Work with the local municipalities to implement storm water BMP's (ponds) at MS4 discharge locations where potential fish habitat and passage can also occur. Ex. Thiensville/Pigeon creek - 70

WDNR Response: *The specifics covered in this comment are outside of scope of this plan. However, these concepts are general covered under Vision IV Goal D Objective 2.*

Goal B

Comment: Goal B Objective 2 Tactic E - While updating the Milwaukee river Walleye Management Plan utilize non-profit efforts such as Walleyes for Tomorrow on site portable fish hatchery. This will be no cost to the WDNR, tax payers yet potentially have an effect on young of the year. This is positive work without the costs and provides valuable study information as the project unfolds (ie netting results, egg counts, etc). - 70

WDNR Response: *See Vision II Goal C Objective 2 – this could be part of an updated Milwaukee River Walleye Management Plan*

Comment: Goal B Objective 5 and 6 Limit harvesting and continue to protect and enhance - 70

WDNR Response: *Comment noted*

Comment: Goal B Objective 3 Tactic b – Keep streamside rearing going and look for volunteer support and create an awareness for habitat improvement – 70

Comment: Goal B Objective 4 Continue to utilize and advocate fishing and other clubs to assist in Muskie re-introduction as Green Bay has the ability to produce a world record – 70

Comment: Goal B Objective 8 – I believe with continued efforts of dam removal and habitat improvements the northern pike and small mouth bass will come back on their own. Getting assistance with volunteer groups (such as Walleyes for Tomorrow) with the walleye and the WDNR's help will allow the walleyes to have another shot at coming back. I understand there have been some earlier efforts but that is before some dam removals and years before some of the current storm water rules and efforts. The river is changing, it is getting better, to not take advantage of the volunteer groups that are willing to help would be detrimental. People want to help, the WDNR cannot do it by themselves, too many things to do, to many places to be and not enough staff -70

WDNR Response: *Comments noted; See Vision IV Goal D, Objective 2 Tactic a*

Comment: Estimated costs for protection/ restorations were not given. Why not and what are the costs? - 56

WDNR Response: *As plans are developed for individual species restoration, costs will be part of the analysis. This document lays our broad objectives and tactics and is not meant to be a feasibility study or a specific restoration plan.*



Responses to Comments (cont.)

Comment: Objective 5. This should be postponed, per historical data and questionable science- 56

WDNR Response: *Understanding the mortality factors effecting yellow perch in Green Bay is pivotal to managing this important sport and commercial fishery.*

Comment: Objective 10 should be added to Goal B, “to restore native yellow perch populations in Lake Michigan” - 56

WDNR Response: *Restoration of yellow perch in Lake Michigan is probably not feasible. However, we have added a tactic to determine if nearshore areas in Milwaukee could be enhanced. See Vision I Goal B Objective 7.*

Goal C

Comment: Objective 4. This objective should be removed. The health of the whole lakes starts with a solid, healthy forage base, the DNR should forget alewives and manage for native species like cisco and chubs instead, stocking them if needed - 56

Comment: The salmon are not critical to the natural ecosystem, they are the root cause of our invasive species problems, they have no real value, they’re costing us billions of dollars a year, about to cost us all our lakes and rivers – 6

Comment: Any concerns about the welfare of the alewives is counterproductive to restoring and protecting the ecosystem, if the priority remains to keep alewives dominant then all your “plans” are useless, the results/proof is in the lake. Simply Lose the Salmon or Lose the Lakes- 6

WDNR Response: *The Department is committed to a healthy trout and salmon fishery on Lake Michigan and a viable alewife population is critical to the success of that fishery.*

Goal C

Comment: Objective 5 Manage nonnative mussel populations to minimize impacts to native species. Tactic a. Manage and increase whitefish populations through the elimination or reduction of commercial whitefish harvests. Why is it o.k. to put salmon in the Lake to control alewives but not leave whitefish in the Lake to eat mussels? That’s crazy. Why are whitefish being netted? – 56

WDNR Response: *Although whitefish eat some Dreissenid mussels, they do not eat enough to effectively control mussel populations. This would be true even if all whitefish harvest was halted.*

Fish passage

Comment: Habitat restoration and removal of obsolete dams are also important components of the plan which will improve stream fishing opportunities, boost spawning success, and increase the productivity of recreationally and commercially harvested species- 18



Responses to Comments (cont.)

Habitat restoration

Comment: With regards to reducing the impact of non-native species: I encourage the Fisheries Management team to pursue ANY and ALL avenues to reduce/eradicate the dreissenid mussels. The potential economic impact of losing the salmon sport fishery should be of the utmost concern to the agencies. Native populations such as bloater chub, cisco, whitefish and lake trout are un-desired by the public when compared to salmon and the restoration efforts of those species should be placed way below the maintenance and sustainability of the salmon and alewife populations at this point in our history. Even commercial fishing has a much lower economic impact on our state compared to sport fishing and as such should be considered less important in the management initiatives compared to maintaining a top notch sport fishery- 92

Habitat, walleye

Comment: There was some discussion about how the walleyes that were stocked never made it out of the river and that may be due to lack of structure in the harbor. What about installing artificial reefs or fish cribs or something that could provide walleye with some cover- 11

Habitat, yellow perch

Comment: Along with a stocking program, work to restore or improve spawning beds and perhaps other perch cover to enhance the possibility of some natural reproduction in and around the harbors and estuaries- 88

WDNR Response: *Comments noted. We agree that habitat is often a limiting factor and will work with applicable partners to develop and seek possible funding for habitat projects throughout the basin.*

Aquatic invasive species

Comment: With regards to reducing the impact of nonnative species: I encourage the Fisheries Management team to pursue ANY and ALL avenues to reduce/eradicate the dreissenid mussels. The potential economic impact of losing the salmon sport fishery should be of the utmost concern to the agencies. Native populations such as bloater chub, cisco, whitefish and lake trout are un-desired by the public when compared to salmon and the restoration efforts of those species should be placed way below the maintenance and sustainability of the salmon and alewife populations at this point in our history. Even commercial fishing has a much lower economic impact on our state compared to sport fishing and as such should be considered less important in the management initiatives compared to maintaining a top notch sport fishery- 92

Comment: Do we have any data on what species flourish in the disrupted food chain? For example, what species directly eat mussels or eat prey species that flourish on mussels? Is research occurring to help figure this out? I think the plan should directly answer these question if the data exists, and if it doesn't exist, it should be a goal with revisions to the plan called for when we know the intricacies more thoroughly - 7



Responses to Comments (cont.)

Comment: Support all efforts to control Quagga mussels in particular mitigate their devastating effect on chub growth rates – 17

Comment: Research commercial use of zebra mussels and other problem species in Lake Michigan. Make a resource out of mussels rather than just a problem. Should look at other areas in the world for examples- 15

Comment: Sea lamprey have been in the lake since the 20s. They have never been spotted in the Milwaukee River. But we don't have a lamprey problem right now but am concerned it will stop fish passage projects. Naturally reproducing fish populations are the way to go and that won't happen with dams stopping movement. Dam removal is good for water quality and good for fish- 49

Comment: VHSv is being treated as a nuisance in MI and more science is needed in Wisconsin. This should not be used to stop good things from happening in the Milwaukee River- 49

WDNR Response: *Comments noted; WDNR will continue to work with partners in collaborative solutions. We'll continue cooperation with State and Federal partners to control invasive species as funding and applicable laws allow.*

Lake Michigan Yellow Perch

Comment: Re-establish the yellow perch population through a 5 year experimental stocking program- 1, 88

Comment: Improve shore fishing for yellow perch- 21, 36

Comment: Restore yellow perch – 54

WDNR Response: *We have added a tactic to determine if nearshore areas in Milwaukee could be enhanced. See Vision I Goal B Objective 7.*

Lake Trout

Comment: Does not like the strains of lake trout stocked by the Feds and feels the current strains will promote a poor sport fishery- 95,96

WDNR Response: *WDNR works with the Federal government and neighboring states on lake trout and we are always looking to improve the lake trout strain mix stocked into Lake Michigan. Stocking is geared towards natural reproduction and we won't stock deepwater siscowets.*

Prey community and lake trout

Comment: Wants a good alewife, chub and smelt fishery to support the stocked trout and salmon fishery and not for lake trout- 95,96

WDNR Response: *WDNR is committed to a diverse fishery and lake trout are part of the desired species assemblage for a diverse Lake Michigan fishery.*



Responses to Comments (cont.)

Pro native species

Comment: Promoting a DIVERSE and NATIVE ecosystem is the best route in my book because everyone gets what they want, just maybe not in the quantities they want- 11

Comment: Native fish can co-exist with the non-native's. It should be understood that while there are people earning a living off the great lakes fishery, there are people like me that think they are raping the lake and ruining it for the people that want to catch the same fish. I'm not sure it's fair to listen to a great lakes fishery captain that wants the WDNR to stock fish with my money so he can make money. I would rather see my money used for getting the native fish back where I can take a kid fishing...along the stream bank or park... or within the break walls of the great lake.

WDNR Response: *Comments noted and WDNR always manages the Lake Michigan fishery for diverse needs of our angling public.*

Stream classification

Comment: In addition, the Department should work to adopt a revised stream classification system to increase protection for habitats that seasonally or historically supported trout and salmon- 18

Trout/ Salmon NR

Comment: Can we modify Wisconsin streams to increase natural reproduction of salmon and trout as is happening in the State of Michigan- 15

WDNR Response: *See Vision II, Goal A, Objective 3.*

Walleye, perch

Comment: Stop the plan to stock walleye all together- 19

Comment: Document wide, remove any reference to the Milwaukee River and walleyes on past study reports and results- 47

Comment: I think this project should address introduction of more walleye in the Milwaukee River and Harbor. We should be able to have a salmon and trout fishery and a walleye fishery- 11, 12, 42, 57, 71

Comment: Another predatory fish like walleye should not be stocked in the Milwaukee River and Harbor, protect what we have already with the salmon and trout program- 8, 9, 45, 47

Comment: Restoration of the native Perch and Walleye will result in a reduction in the current invasive species populations- 6

WDNR Response: *See Vision II Goal C Objective 2- These issues will be part of an updated Milwaukee River Walleye Management Plan.*



Responses to Comments (cont.)

Vision II. A diverse multi-species sport fishery within the productive capacity of the lake

Lake Trout

Comment: The majority of anglers do not support increasing the population of lake trout while it seems the DNR does support the Implementation Strategy for Lake Trout - 3

Comment: Reduce stocking of Lake trout by 25% and put half that amount back in as Chinook salmon - 29

Comment: Increase the stocking of lake trout for sure and also rainbow trout but not coho salmon because it only benefits the southern part of the lake - 86

Comment: There should be more trout and less salmon in the Lake. More trout would be better because they live longer and eat less and may reproduce – 6, 87

Comment: If the salmon fishery crashes I would suggest that the states continue to stock trout of all species such as steelhead, browns, and lake trout and focus on building Lake Michigan into a world class trout lake until the biomass can rebound. When the biomass rebounds then you can increase salmon stocking. I suggest cutting salmon stocking or keeping them at current levels until the biomass rebounds. Trout do not need alewives to survive like salmon they are more opportunistic feeders and would continue to offer sport fishing opportunities both boat and shore – 89,92

WDNR Response: The number of salmon and trout stocked into Lake Michigan by Wisconsin is governed by internal policies and agreements with other states. Wisconsin has agreed to abide by the strategy set forth in the “A Fisheries Management Implementation Strategy for the Rehabilitation of Lake Trout in Lake Michigan”. This is shown in Vision I Goal B Objective 1. In addition, overall stocking numbers in Wisconsin has been discussed at many public meetings over the past two decades. We have taken all those viewpoints into consideration and have decided to stock numbers to reach the harvest target ranges shown in Vision II, Goal A. Most recently, we have reduced stocking numbers in Wisconsin waters to 300,000 fish and have begun the process to change lake trout fishing regulations to allow more fishing opportunities. We are also in the process of working with state, federal, and tribal partners through the Lake Michigan Committee to assess lake trout restoration goals.

Chinook salmon / Coho Salmon stocking

Comment: Increase stocking of chinook salmon, the 50% reduction lakewide was too much – 1, 50, 80, 83, 84

Comment: Since Michigan has so much natural reproduction, increase the allocation of stocked chinook to Wisconsin DNR and reduce the number in Michigan – 29, 38, 84

Comment: Chinook stocking reduction was too great. The 50% reduction should have been only a 25% to 30% reduction and a greater percentage should be planted in the southern end of the lake. Even a 15% swing will make a big difference come August – 29

Comment: WDNR should react as swiftly to increase chinook stockings as it did to decrease them, in light of an increase in the alewife population and average weight of chinooks. Adjusting chinook salmon stocking numbers on a yearly basis – 5, 29, 40



Responses to Comments (cont.)

Comment: I am concerned about the 10-year plan's goal of a reduced chinook harvest and increased coho harvest, since cohos benefit mainly the southern ports which already have an early season opener for cohos in April and May – 5, 16

Comment: Stock more Chinook salmon rather than coho. The money spend on coho salmon should go toward chinook salmon because the Gills Rock area anglers do not catch coho – 16

Comment: Stock more fish in Milwaukee. The World Class Sport Fishery, at least in Milwaukee County, is on life support! Shift a percentage of the chinook stocking to Kenosha. Racine, Kenosha, Milwaukee each had about 10,000 Chinooks taken and diverted up north. We want our fish back. If we don't have stocked fish staging we will lose our fishery and businesses. Stock more fish in the south – 35, 38, 39, 40

Comment: We need fish to be imprinted in the Kenosha area. We do not get a return it's been terrible for years – 44, 98

Comment: We need to go back to the original formula where each county gets an equal amount of the chinook plantings. The allocation formula used for 2014 giving each county 75% of the original allocation and the remaining 25% taken and given elsewhere is not acceptable – 39

Comment: Where were the big fish from all that stocking reduction? – 54

Comment: Salmon may not be natural to the lake but they are the best invasive species introduced. Just hope it continues – 29

WDNR Response: *Overall stocking numbers in Wisconsin has been discussed at many public meetings over the past two decades. In addition, salmon and trout stocking reductions, stocking strategies and allocation issues have been discussed at many Lake Michigan Fisheries Forum meetings since 2012. At those meetings, the group reached consensus on the overall Chinook salmon stocking reduction and the new strategy to allocate those fish to Lake Michigan and Green Bay ports. We are committed to reviewing the latest information on a yearly basis and determine the best course of action to maintain the salmon and trout fishery. The WDNR has taken all those viewpoints into consideration and has decided to stock numbers to reach the harvest target ranges shown in Vision II, Goal A. In addition, the strategy to allocate Chinook salmon stocking numbers per county has been set and is based on fall fishing statistics to distribute these fish. Those statistics are the number of charter trips, directed effort, harvest rate in September and October and Coded Wire Tag information when it becomes available. To review this information, please visit the Lake Michigan Fisheries Forum Website <http://dnr.wi.gov/topic/fishing/lakemichigan/LakeMichiganFisheriesForum.html>*

Coho salmon

Comment: There must be room in the Wisconsin hatcheries to raise more Coho salmon since we have reduced the Chinook – 50

Comment: Stock more cohos in Green Bay – 50

WDNR Response: *Wisconsin's DNR hatchery system is currently at maximum capacity and can only produce about 400,000 yearling Coho salmon annually. We anticipate that a newly renovated Kettle Moraine Springs Fish Hatchery will be online in the next several years and will provide the Department with more hatchery space and greatly flexibility in stocking full quotas of all salmon and trout species. Due to poor*



Responses to Comments (cont.)

returns, the Lake Michigan Fisheries Team decided several years ago to discontinue the stocking of Coho salmon in Green Bay. We do continue to stock Chinook salmon, rainbow and brown trout to provide a good species mix in Green Bay.

Rainbow Trout (Steelhead)

Comment: Update Steelhead Management Plan including revising stocking numbers, locations, fishable miles used in stocking decisions, strains, etc. – 19,43,46,48

Comment: Raise the size limit on trout and salmon due to natural reproduction – 19

Comment: Stock more fish on the Wisconsin side because of the natural reproduction going on in Michigan. Or pull some % from the north and add it to the south – 19

Comment: Stock more rainbow trout and increase their population in the Lake – 14, 83

WDNR Response: *We agree that the Steelhead Management Plan needs to be updated. A good time to update the plan would be in conjuncture with the renovation of the Kettle Moraine Springs Fish Hatchery (see answer above). This is a tactic in the current plan (Vision II Goal A Objective 5 Tactic a).*

Brown Trout

Comment: Continue offshore planting of browns in late spring when the fish are bigger which will improve the survival rate – 27, 28, 32, 33, 34, 53, 55, 59

Comment: Continue to restore and increase brown trout populations in Green Bay which are low right now – 14, 16- 27, 51

Comment: What can be done to bring back the fantastic brown trout fishing in Green Bay? – 27, 63, 78

Comment: Green Bay brown trout fishery versus the overall Lake Michigan fishery, we'd like to see some more emphasis on Green Bay because it is more of a local fishery than the salmon that seem to travel from one of the lake to the other end of the lake – 52, 55, 78

WDNR Response: *We agree that stocking later in the spring may increase survival; however, capacities of our state hatcheries limits how late in the spring brown trout can be held without negatively affecting hatchery space for other species stocked in Lake Michigan. In response to low returns on Green Bay brown trout, WDNR began releasing fish offshore in 2010 instead of direct stocking into main tributaries of Green Bay. Depending on the outcome of this action (Vision II Goal A Objective 6 Tactic a), we will continue to explore other options to increase survival of stocked trout in the Green Bay ecosystem.*

Brown Trout Collections

Comment: The department takes mature brown trout from the weir or by electro shocking every year for brood stock. These fish are taken to the Kewaunee facility where after they are spawned they are either sacrificed for fish health or get passed upstream there. Based on the return of mature fish from stocked finger-



Responses to Comments (cont.)

lings and yearlings this is significant. Racine should be compensated to make up for these lost fish – 42
WDNR Response: Wisconsin DNR staff collects adult brown trout (seeforellen strain) each fall, transfers them to the Besadny Anadromous Fisheries Facility and spawns them onsite. We attempt to collect fish from a variety of locations based on where these finclipped fish were stocked 2 to 4 years prior. Since we only finclip a limited number of fish, we can only collect these fish from the Kewaunee and Root River. It would be cost prohibitive to return these fish back to the stream in which they were collected. We are working to clip and stock seeforellen brown trout in the Sheboygan River to give us more flexibility in the locations we collect fish for spawning.

Brown and rainbow trout

Comment: Take money saved on less stocking of chinook salmon to....address brown and rainbow trout – 14

WDNR Response: The stocking reductions for Chinook salmon starting in 2013 were not based on saving money but rather to match the predators in the lake with the available prey. There is some small savings mainly in food that comes with stocking about 30% less Chinook salmon but not enough to appreciable increase the stocking numbers for other species. In addition, we don't have the hatchery capacity to raise more fish.

Brook trout

Comment: Brook Trout are overlooked as a Lake Michigan native that could provide excellent shoreline fisher action – 7, 46, 47, 57, 62, 98

Comment: Besides the trout and salmon stockings in the past, we have lost the stocking of several other species and I would like to see those species back as part of the 10 year Plan for the waters of Green Bay as well – 55

WDNR Response: Brook trout have not been stocked in many years for three basic reasons: poor return to anglers, predator stocking limits and hatchery space limitations.

Trout and salmon stocking

Comment: Night stocking of salmonids, sport fishing clubs to fund any overtime associated with this activity - 41

WDNR Response: We will consider this request to maximize creel returns to anglers while not incurring additional program costs and not compromise staff safety. In order to insure funding is available, WDNR would have to enter into an agreement with clubs.



Responses to Comments (cont.)

Trout and Salmon in Green Bay

Comment: Green Bay needs to get its fair share of salmon and trout. The DNR needs to look into revitalizing the trout and salmon fishery in Green Bay waters - 13, 24, 25, 26, 28, 30, 31,32, 33, 34,55, 59, 60, 61, 78, 85

Comment: The Brown trout stocking seems to be helping, however numbers seem to be greatly reduced from previous levels. I believe the Brown trout stocking program needs to continue, as well as, other sports fish that appear to be down in numbers including lake trout, rainbow trout, and even salmon - 22, 24, 26, 28, 30, 31,32, 33, 34,47, 59, 60, 63, 85

Comment: As a bay fisherman, I would ask that you please do not minimize the importance of the waters of Green Bay in your planning and decision making - 81, 82, 93

Comment: Our trout and salmon fishing has been nothing but pathetic for years now. I fish walleye a lot now because of this but wish the fishery could return to what it was in the late 80's. There is a ton of bait in the bay to support salmon and brown trout. Our club works closely with the fish biologists and DNR donating much needed equipment through our funds - 20, 25, 59, 60, 64, 78, 93, 94

WDNR Response: *The Department continues to adaptively manage the stocked trout and salmon fishery by offshore stocking brown trout and working with clubs to utilize net pens for salmon in attempt to increase survival in an ever-changing ecosystem that is dominated by native predators. It is too early to tell if these management actions will increase survival and return to creel of Green Bay salmonids.*

Lake Michigan Yellow Perch

Comment: Create an ambitious plan to reinstate the perch population and enhanced near-shore fishing opportunities - 4, 36, 42, 73, 75, 76, 77

Comment: I think it would be great to try planting extended growth perch 3" to 4" or 4" to 6" perch into Lake Michigan and see if they can survive and maybe thrive - 69, 72, 73, 74, 75, 77, 79

Comment: Bring back a size limit, 7" or 8" along with an small increase in the daily harvest limit to 10 fish Or create a slot limit, minimum 7" with one fish over 12" - 88

Comment: In order to pay for such and effort I recommend lowering the Great Lakes Salmon and Trout stamp and requiring everyone who fishes Lake Michigan or Lake Superior to purchase a stamp. Let the perch fisherman, the walleye, bass, musky, and whitefish angles help pay for the perch management. Reducing the stamp to an affordable \$3 or \$5 and requiring everyone to have one, may increase revenue by adding angles that fish other species, and may also increase the number of salmon and trout fisherman. Change the name of the stamp to "Great Lakes Fishing Stamp." - 88

WDNR Response: *The Department is currently working on restoration efforts in the Milwaukee area for yellow perch. These efforts will be focused in the Milwaukee River, harbor and estuary areas because efforts to increase the yellow perch population in Lake Michigan proper are not feasible and are cost prohibitive. We have outlined the basics for the plan in Vision I Goal B Objective 7.*



Responses to Comments (cont.)

Green Bay Yellow Perch

Comment: Anglers are concerned with the GB perch population. They are near non-existent. Size class is extremely small. What happened to our good year classes. It seems like older year classes are not there. What's affecting the population and growth? – 94

WDNR Response: *Natural reproduction and year class strength of both yellow perch and walleye have been rather extraordinary in Green Bay during most years between 2003 and 2013. Natural mortality on younger, smaller yellow perch has likely been quite high during this time period as a result of the predator/prey interactions observed between walleye and yellow perch.*

Net Pens

Comment: Acknowledgement that net pens were instituted during the past period and mentioned them specifically in this plan. Number of chinook allowed in net pens should be increased to more than 50% - 10

Comment: Net pens may be beneficial. Net pen projects should continue specifically in Marinette County. – 47, 55, 94

WDNR Response: *Starting in 2013 and continuing into the future, we have been working with local groups to stock salmon and trout into net pens (primarily Chinook salmon). Currently we have net pen operations in Marinette, Gills Rock, Kewaunee, Port Washington, Racine and Kenosha (Coho pond). These net pen operations were started because there was a demonstrated management need for the net pens, the net pens were part of a long-term stocking experiment or the net pen projects were started prior to 2016. We will evaluate the success of these net pens over the next 3 to 5 years (2017 – 2020) and will determine the scope of the project after that time.*

Green Bay Walleye

Comment: Since Michigan is talking about expanding their area where fishing is allowed in the early spring, we'd like to see the Wisconsin and Michigan DNR work out something where they could either go back to the 3 fish limit that existed before or 2, or something greater than one because I think the fish are out there – 52

WDNR Response: *Comment noted. We have annual meetings with MDNR to discuss fishing regulations in border areas.*

Salmon Stamp

Comment: Salmon license should be \$20 and the increase going to the stocking program for Chinook, Coho, Rainbow(multiple strains), Browns and maybe even the Brook trout – 29

Comment: Raise the license by \$5 but the extra better go towards salmon and trout – 54

Comment: I don't know why the WDNR has not raised non-resident, great lakes stamp, and fishing license to create more revenue towards stocking efforts, better hatchery facilities, and river restorations. It seems as



Responses to Comments (cont.)

though places like Indiana and Michigan are light years ahead of Wisconsin in protecting their resources – 90

Comment: Find other public sources of revenue. It's time the burden of supporting a Lake Michigan fishery to other stake holders that benefit from the sport. The industry supports countless jobs in the service industry, tackle shops and manufactures, gas stations, restaurants, hotels, etc. Not to mention other citizens that don't fish or use the resource directly – 88

WDNR Response: *License fee amounts are brought forth and approved by the legislature and the Governor's Office. The spring Conservation Congress meetings would be the appropriate meeting for stakeholders to voice their opinions on the status of license fees in Wisconsin.*

Comment: Shouldn't the two day Great Lakes License go to the Lake Michigan Fund – 37

WDNR Response: *Money collected from this license go in the Great Lakes Trout and Salmon Stamp fund (1/2) and the Fish and Wildlife Account (1/2). These are the appropriate locations for this license fee.*

Forage

Comment: Forage fish or lack thereof is a problem. We don't want to overstock salmon and trout and create a Lake Huron situation – 49

WDNR Response: *We agree and that is why agencies reduced Chinook salmon stocking lakewide by 50% starting in 2013. Wisconsin's portion of that reduction has been 30%.*

Goal A

Comment: Objective 1 - 'Tactic e' it should be changed to "Tactic e. Continue to favor allocation of the available surplus production of forage to salmonine predators, rather than to commercial harvests." - 56

WDNR Response: *While salmon and trout do eat other forage, their main forage fish they eat are alewives. We continue our long-standing policy that surplus alewife production should go to salmonine predators. Other forage in the lake including bloater chubs, rainbow smelt, round gobies, etc. are not specifically favored for the sport or commercial fisheries.*

Goal B

Comment: Objective 1 - This Objective should be removed because it costs too much, \$1.6 million/yr. in non-stamp subsidies, forage is still not stable and 55% of salmon are naturally reproducing now (but at unknown future levels). What levels of pollution move up streams with dying salmon? With all the hatcheries on Lake Michigan, surplus salmon/trout could be purchased from other States if needed - 56

WDNR Response: *In order for Wisconsin to sustain the salmon and trout program on Lake Michigan, it is critical that we have an updated and fully functional hatchery system.*



Responses to Comments (cont.)

Goal C

Comment: Objective 2 - -Tactic a, rainbow stocking should be eliminated because cost/benefit isn't worth it and since scarce forage is needed more for salmonine predators. -tactic a should instead read: "Tactic a. Start stocking Lake Michigan strain yellow perch into Lake Michigan". Money saved by not stocking rainbow trout could be used to stock perch instead. Why are 5 other species worthy of restoration and not yellow perch? The public has in the past voted to stock perch, the DNR argued against stocking without providing any cost/benefit ratio. What is the estimated cost/value of even a partially restored (1996 level) sport perch fishery? Why is the depleted, native yellow perch still on the list of commercial species, while the harmful alewife is not? – 56

WDNR Response: *The stocking of rainbow trout contributes to a diverse Lake Michigan fishery. Great Lakes Salmon and Trout stamp sales pay for the rearing and raising of these fish and could not be used for yellow perch stocking. In addition, stocking of yellow perch in Lake Michigan would probably not be successful so efforts have been initiated in the Milwaukee Estuary. See Vision I Goal B Objective 7.*

Improve southeast inshore fishery

Comment: Emphasis needs to be placed on restoring some assemblage of a Lake Michigan inshore fishery off of Southeastern Wisconsin. Within the past 50 years there were vibrant perch, rainbow smelt, and salmonid fisheries that shore anglers could utilize. Now, for all practical purposes, those fisheries are non-existent. Traditional breakwaters and harbor fishing areas that at one time provided for heavy angling opportunities are devoid of anglers. Inshore anglers, for all practical purposes live on the edge of a massive lake with no fishing opportunities unless one has access to a large boat, which many anglers cannot afford – 57

WDNR Response: *We agree. We have added a tactic to determine if nearshore areas in Milwaukee could be enhanced. See Vision I Goal B Objective 7.*

Burbot

Comment: Burbot are a good food fish and I have heard that they seem to be at least holding their own in the upset energy pathways in the lake ----- would this be a good fish to manage for commercial exploitation? – 7

WDNR Response: *The Department has not spent much time and money on investigating the burbot population in terms of numbers, biology and impact to other species. While a good idea, at this time we don't have the resources to start a burbot fish management program. However, we do get some limited information on burbot via our Lakewide Assessment Protocol survey. In addition, we do allow burbot to be harvested by commercial fishermen via a rough fish contract.*



Responses to Comments (cont.)

Hatchery renovations

Comment: Renovating and continuing to fund state hatchery facilities is instrumental to the successful restoration of populations of cool-water sport fish, including steelhead, brown trout, chinook and coho salmon – 18

WDNR Response: *We agree. Money from the last two budget cycles have been allocated to Kettle Moraine Springs Fish Hatchery. We are proceeding to work on plans to remodel that hatchery which will give us more rearing options for salmonid species.*

Tournaments

Comment: Tactic d. Fish may not be transported from immediate vicinity of boat launch – weigh-in must occur in area immediately adjacent to boat launch. Tactic e. Dead fish may not count towards prize determination and must be donated to non-profit groups for consumption or kept by angler (subject to general fishing regulations). Tactic f. “Sorting” of fish during tournament is illegal as per general fishing regulations - 23

WDNR Response: *We are committed to working with tournament organizers, anglers and stakeholders to maximize the survival of fish caught during tournaments. The tactic f, proposed in this comment, is in direct opposition to legislation that was passed several years that allows culling in permitted bass tournaments.*

Blue Catfish

Comment: Stock Blue catfish in the Kenosha Harbor to augment the shore fishing – 98

WDNR Response: *Blue catfish are not native to Lake Michigan and are native to Central and Southern United States. Their habitat requirements include warm water which is not sufficiently present in the harbors of Lake Michigan to support populations of blue catfish.*

Vision III. A sustainable and viable commercial fishery

Automated Quota

Comment: The current plan being developed to value the chub quota is a good starting point to investigate the potential of an automated system. While there would be some controversy making the system more readily responsive should be done – 17

Comment: Modifying the rule-making process by automating or streamlining commercial harvest limit adjustments using objective, scientific measures of population abundance would allow fisheries to be managed in a timely and environmentally sound manner – 18

WDNR Response: *We agree and started the formal process to “automate” the bloater chub quota setting process in 2015. We are currently working with the legislature, Governor’s office, and stakeholders on the appropriate rules governing bloater chub harvest.*



Responses to Comments (cont.)

Commercial Fisheries Management Funding

Comment: On page 33, the following sentence should be edited to include the underline words: The Department spends about \$750,000 annually (based on FY2012) to manage commercial fisheries per that year the WDNR only takes in about \$75,000 in commercial license fees – 97

WDNR Response: *See modification to Vision III Goal A.*

Comment: Goal A. Adequately fund commercial fisheries management. The Department spends about \$750,000 annually (based on FY2012) to manage commercial fisheries yet only takes in about \$75,000 in commercial license fees.” This does not match figures supplied by Mr. Staggs DNR (letter of February 8, 2013), in which he stated \$776,000 in costs for FY2012. Please update that number – 56

WDNR Response: *The figures supplied in the draft LMIFMP are estimates not actual numbers as are the numbers relayed in a letter from Mike Staggs on February 8, 2015. It is difficult to determine precisely how much commercial fishing management and enforcement costs because there is substantial crossover between sport fish management and commercial fisheries management. These numbers have been further refined in this final edition to estimate Lake Michigan and Lake Superior costs from projects that are directly attributable to commercial fishing.*

Comment: Various comments requesting either to cease funding commercial fisheries management with license funds or providing potential suggestions on alternative funding mechanisms including seeking external funding, raising commercial license fees and reducing management activities – 17, 18, 39, 96, 97

WDNR Response: *Funding commercial fisheries management with license money is an issue that needs attention and is addressed in this plan. Vision III, Goal A is to “Adequately fund commercial fisheries management.” Specifically Objective 1 of Goal A is to “Pursue alternative sources of funding for commercial fisheries management to reduce the dependence on sport license and fee funds.” These actions are difficult and require action beyond the DNR. In the meantime, however, we are committed to effectively managing the commercial fishery and will continue to fund commercial fisheries management to the necessary level using our available funds including license money. We are required by state statute to provide for a commercial fishery. Management of the Wisconsin Lake Michigan commercial fishery is necessary for both the long-term sustainability of the commercial fishery as well as the long-term sustainability of Lake Michigan recreational fisheries.*

Comment: Money from NOAA, other Federal Agencies, Pew Trust. Need a grant writer to help find these other funding sources – 17

Comment: What is needed is a fisheries grant writer who already understand the processes and has some knowledge of what is necessary and available. Do not waste effort trying to reinvent the wheel when the needed expertise already exists... Look to NOAA and other federal and independent places to aid in funding for commercial fishing. Recognize the value of the commercial fishery to the state and find external funding to enhance it, not just control it – 17

WDNR Response: *Comment noted. Pursuing alternative and additional funding for commercial fishing management is included in this plan. See Vision III Goal A and Vision IV Goal B.*



Responses to Comments (cont.)

Lake Trout

Comment: Now that there is a possible self-sustaining lake trout population, this draft needs to include a potential commercial harvest. All of the efforts for all these years were to include a creation of a commercial catch- 17

WDNR Response: *Currently there is some natural reproduction of lake trout but lake trout are not self-sustaining in Lake Michigan. The natural reproduction appears to be limited to the southern basin and natural reproduction is at relatively low levels (about 30% in some surveys and less in others). Restoring lake trout to levels that support commercial harvest is a tactic in this plan, Vision III Goal B Objective 3 Tactic c.*

Commercial Fisheries Licensing

Comment: The number of licenses should be reduced to 10 or less, expenses cut or license cost raised, fish auctioned and a minimum biomass, by species, must be maintained for Lake health, this would have prevented the 1995 perch and later the chub crash – 56

Comment: The Vision also fails to put into proper context current commercial fishing, thus denying the public needed information. Minimum harvesting requirements deemed critical in 1988 were removed in 2012, because there weren't enough fish left. While there may be approximately 80 commercial fishing licenses on Lake Michigan, only 43 actually fished in 2012 (DNR commercial database). Of those 43 active fishers, 6 fishers harvested 67% of all the fish by poundage (\$4.3 million total dockside value), while the bottom 22 fishers harvested just 5%. More sport license money would have to be stolen to subsidize any of those 37 commercial fishers entering/reentering the fishery, that can't be allowed since it's illegal to steal from sportsmen to subsidize nets – 56

WDNR Response: *The current number of licenses is 56 commercial fishing licenses for Lake Michigan with many of those license holders not actively fishing or fishing to a minimal degree. There is a current maximum of 65 licenses available. Lake Michigan commercial fisheries are managed by a total allowable catch system and we set the total allowable catch to be ecologically sustainable based on the best available biological information. The low populations of yellow perch in southern Lake Michigan and bloater chub lakewide are due to ecological factors not commercial fishing. Invasive invertebrate species (e.g., quagga mussels, zebra mussels, spiny water flea) have drastically altered the Lake Michigan ecology substantially reducing favored prey items of bloater chub and young yellow perch. Other ecological factors may be contributing to the low abundance as well.*

Comment: Please also correct your number of licensees and maybe mention the grouping of licenses for business purposes (In reference to narrative for Vision III) – 17

WDNR Response: *See document for changes.*

Comment: Any inactive licenses should be retired and not opened up to any other commercial fishers – 39

WDNR Response: *Comment noted.*



Responses to Comments (cont.)

Commercial Fisheries Reporting

Comment: Electronic Fish Harvest Reporting – Federal programs are using these methods. We need to get going on this. Need to expand and get a handle on whitefish harvest by using this program with Green Bay whitefish guides – 17

Comment: The EFHRS is long overdue. Many obstacles and mistakes have been made in what should have been a simple change. People regularly conduct secure business transactions on their smartphones which most everyone has. This will be a cost savings and to imply a fee increase is the holdup is insulting – 17

WDNR Response: *Finishing and implementing an electronic fish harvest reporting system for the commercial fishery is specifically in this plan as an action (See Vision III Goal B Objective 5). Developing and implementing such a system is costly and as described in this plan we expend far more managing the commercial fishery than we collect in fees. We have not had sufficient funds to develop and implement an electronic harvest reporting system. We attempted to implement this program using old and obsolete computers but it did not work due to technology changes. Recently, we have received a grant from the US Fish and Wildlife Service to develop an electronic harvest reporting system. Using this grant funding we completed the programming and are searching for funding to implement the last steps of the program. Developing a guided reporting program for guides (non-trout and non-salmon) is in this plan (See Vision II Goal A Objective 2 Tactic e).*

Comment: We should also develop a fleet reporting system that allows individuals to retain their autonomy but still group their efforts for business purposes – 17

WDNR Response: *Comment noted.*

Enhancing the Commercial Fishery

Comment: Nothing in the plan about enhancing the commercial fishery – 17

Comment: A VIBRANT (as opposed to thin shadow) commercial fishery should be a priority for the Lakes – 7

WDNR Response: *Funding for commercial fishing management is limited and currently there is a shortfall. Until basic management is fully funded it is difficult to add additional actions to enhance the commercial fishery. However, the DNR remains committed to providing for a commercial fishery and working with commercial fishers and others to enhance the commercial fishery when possible. For example we will work with the Lake Michigan Commercial Fishing Board to regularly review commercial fishing rules to ensure they are efficient and effective and we will encourage externally funded studies of fishing practices to explore new or improved fishing methods. Goal D of Vision III is devote to enhancing the commercial fishery and contains more examples and information.*

Comment: Implement a regular review of rules and/or fishing practices through the Lake Michigan Commercial Fishing Board and implement changes as warranted through a streamlined process. We do know



Responses to Comments (cont.)

how the system works but have a difficult time getting any traction on our recommendations through the Lake Michigan Fisheries Team – 17

WDNR Response: See revisions to Vision III Goal D Objective 1 and revisions to Tactic a under Objective 1.

Comment: Consider ways to aid quota harvest by adjusting or eliminating some restrictions. The different allocation of the also whitefish increase was a good example. Eliminating zone boundaries now that we have so few fishers would also help but the financial ramifications might be an obstacle. A specific change that should be non-controversial would be to expand zone 2 to include the eastern side of Green Bay, north of Sturgeon Bay. This area is not fished by Zone 1 fisheries and would allow some additional harvest to provide for the very important Door County tourist market – 17

WDNR Response: See additional Tactic c under Objective 4 of Goal B, Vision III

Adjusting Commercial Harvest Limits

Comment: Objective 1 - The DNR has refused to do this for years/decades. Also, 5+ year old data is hardly 'current' and is useless for management purposes. I believe that violates Wis. Stat. 29.519(1m)(b): "The limitations on licenses, restricted fishing areas, harvests and gear shall be based on the available harvestable population of fish and in the wise use and conservation of the fish so as to prevent overexploitation" – 56

WDNR Response: We routinely adjust commercial harvest limits. For example, the lake whitefish quota was increased in 2009 and the Green Bay commercial yellow perch limit was increased in 2007. There are times when adjustments to the harvest limits are not done timely enough and we are seeking to address this issue in this plan (see Vision III, Goal B, Objective 2). The bloater chub and smelt quotas have not been decreased despite decreases in populations. Commercial fishing has not caused these population changes and the current effort and catch of these species is very low. Therefore, it has not been a priority to address the harvest limits for these species. However, we are currently working to lower and improve the bloater chub harvest limit.

Comment: Objective 2. This should be removed – 56

Comment: Objective 2 - tactic a should be removed. 1) As previously stated the DNR hasn't published perch and whitefish SCAA data for 5+ years and had years/decades to reduce limits but chose not to, 2) Automated limits would deny citizens the public meetings in which to object to limit increases. 3) Today's limits, already in huge excess of harvest ability, in effect give any increase in fish numbers to commercials first, while sportsmen have to wait 2 years for limit adjustments. 4) Automatically raising limits would automatically increase sport license subsidies of commercial costs, which is like an automatic tax on sportsmen, that's illegal – 56

WDNR Response: The current Lake Michigan lake whitefish and Green Bay yellow perch catch limits were based upon results of the SCAA models and other data for these two species. These models are routinely run and improved upon to most accurately assess the current populations for these two species. Developing a system of automatic commercial harvest limits based on relevant biological factors would require rule



Responses to Comments (cont.)

changes and substantial public involvement. The harvest limits do not determine the cost to management the commercial fishery (See comment above for a more complete treatment of the commercial fishing funding issue).

Comment: Vision III, Goal B, Objective 1 should be done immediately, moratoriums as needed – 47
WDNR Response: *Comment noted.*

Comment: The statement, “Although we recognize the need to revise harvest limits in response to fish population changes, we do not believe that these declines were caused by excess commercial harvest”, should be removed, as the DNR’s beliefs are biased, not supported by facts and ultimately it was their science and management that is responsible for the horrible condition of today’s fisheries. In protecting the commercial’s piece of the fisheries pie, the DNR failed to protect the fisheries pie from becoming 99% smaller, thereby harming the Lake. A statement should be added “Limits need to be revised because history and studies find commercial harvests negatively impact fisheries” – 56

WDNR Response: *There are three species or populations of commercial species that are in low abundance: bloater chub, rainbow smelt, and southern Lake Michigan yellow perch. We do not fully understand all of the reasons for these low populations and commercial fishing may have impacted these species to some degree. However, the best available science and data from the WDNR, other states, Federal government, Universities, and others indicate lakewide ecological changes caused by invasive species are the primary cause of these low populations.*

Comment: Establishing a commercial harvest of perch in Lake Michigan for both assessment and food should be prioritized. While we have had now harvest the sport fishery has had a limited catch. The objective must be to increase both together – 17

WDNR Response: *Currently the yellow perch population in Lake Michigan cannot support a commercial fishery. See further discussion and details in narrative of Vision III Goal B Objective 4.*

Sport/Commercial Allocation

Comment: Objective 4 - The objective should be changed to read: “A public vote should take place to see if perch and whitefish should be shared and if so, the allocation, by weight.” – 56

WDNR Response: *The commercial catch limits are established by administrative rules and the public have the chance to review and provide input during the limit setting process.*

Comment: Obj 4 tactic a - Tactic a, seeking NRB approval to remove yellow perch from the list of commercial species just like pike.....The Legislature does not demand commercial perch fishing, so ending the netting of perch, just like pike, would prove whether investigating yellow perch survival is valid. See com-



Responses to Comments (cont.)

ment under Vision III about laws not conflicting and current violation of other laws regarding netting perch in GB – 56

WDNR Response: The commercial yellow perch fishery in Green Bay is sustainable and a valuable fishery therefore yellow perch will remain on the commercial fishing species list. The commercial fishery for yellow perch in southern Lake Michigan is closed; however, we will leave this species on the commercial fishing species list for Lake Michigan in case populations recover to higher levels.

Comment: Remove smelt as a commercial species – 56

WDNR Response: Rainbow smelt populations are low; however, the limited commercial harvest does appear to impacting smelt populations. This limited harvest although small is of economic value so we will keep rainbow smelt as a commercial species.

Comment: Some limited should be imposed on the sport whitefish harvest (lower the bag limit to 5). While a shortfall in the zone 2 harvest currently covers the unregulated sport harvest we need a plan to accurately assess the sport harvest and then some discussion on the validity of the zones and/or as pain full as it will be as reevaluation of the quota system – 17

WDNR Response: See modifications to Objective 4 of Goal B, Vision III narrative and inclusion of an additional Tactic C.

Comment: Any attempt to raise the sport harvest of perch (in Lake Michigan) and not establish a commercial quota will be wrong – 17

WDNR Response: Any changes to sport harvest regulations would go through the rule making process and the public would have an opportunity to review and provide input. This plan does not change regulations or rules but sets forth broad goals and objectives in which to focus fisheries management efforts into the future.

Bycatch

Comment: Vision III, Goal C, Objective 1 add tactic making selling of bycatch illegal. Bycatch should be counted, weighed and dumped overboard before landing at a port, if this can't be done then trawling should be abandoned and a moratorium put in place – 47

Comment: Bycatch of bloaters and alewives should not be allowed to be kept by trawlers – 47, 39

WDNR Response: Comments noted. Current laws allow harvest and sale of incidentally caught bloater chub and alewife when targeting smelt.

Miscellaneous Commercial Fishing

Comment: Goal D – Misquotes law and should instead read “Comply with laws demanding an economically viable and stable commercial fishery”. The statement “We take direction from Administrative Code section



Responses to Comments (cont.)

NR1.01, ; should be removed as misleading here and it isn't the law. The DNR must follow law, Wisconsin Legislature (Chapter 418, Laws of 1977, Section 923 (37) (3) - "The intent of the legislature in revising commercial fishing laws is to provide for multi-use management of the Great Lakes fishery, including an economically viable and stable commercial fishery and an active recreational fishery. To reach this management objective, the legislature recognizes that it may be necessary to limit participation in the commercial fishery and to limit the harvest of commercially fished species through proven scientific management techniques." There's also Wis. Stat. 29.519(1m)(b) and NR1.01(9)(a)(b)&(c). All these laws apply, all the time; one can't be violated to allegedly obey another. Hence to protect/enhance sport fisheries it may require an end to netting them, which is allowed by law, like northern pike and alewife were. Which also allows for ending the netting of yellow perch, chubs and whitefish too - 56

WDNR Response: *Goal D accurately quotes Wisconsin Administrative code. Wisconsin Administrative Code is created under the authority of Wisconsin State Statute and is law that directs the DNR.*

Comment: Draft plan does not recognize the access to their resources that all of the people of Wisconsin enjoy through commercial fishing and has tones of anti-commercial fishing - 17

WDNR Response: *See changes in narrative for Vision III.*

Comment: The title should be changed to accurately quote the law, i.e. "Vision III. An economically viable and stable commercial fishery", per Wisconsin Legislature (Chapter 418, Laws of 1977, Section 923 (37) (3) - 56

WDNR Response: *Comment noted.*

Comment: Critically needed information should be added to Vision III: Laws, Rules and Stat's regulating commercial fishing should be quoted here in full just as NR1 was earlier, Wisconsin Legislature (Chapter 418, Laws of 1977, Section 923 (37), Wis. Stat. 29.519(1m)(b) and 'LeClair et al.v.Natural Resources Board and DNR'. Wisconsin Legislature (Chapter 418, Laws of 1977, Section 923 (37) (3) - 56

WDNR Response: *Comment noted. The section narrative is intended to be a brief overview and cannot include all the details of commercial fishing management and laws.*

Comment: Vision III must be instituted before irreparable damage is done to target stocks (i.e. smelt and chubs) - 47

WDNR Response: *Comment noted.*



Vision IV. Science-based management

Comment: The talk in this plan about expanding partnerships, sharing equipment and seeking external funding are extremely encouraging and long overdue. Eliminating duplication of effort and coordinating in research is to be applauded. As part of this effort we absolutely must participate at external meetings with other agencies as appropriate. We also should make an effort to host some of these meetings in Wisconsin – 17

WDNR Response: *We agree and comment noted.*

Comment: Regarding Vision IV, Goal D, Tactic A: Utilize the commercial fleet as possible and recognize the valuable info that is and can be obtained by working with the professional fishermen – 17

WDNR Response: *Comment noted. We agree that working with commercial fishers is valuable and this is specifically in this plan. See Vision IV Goal D Objective 2 Tactic A.*

Comment: I strongly believe that good science is critical to proper fishery management. With substantial changes in lake productivity, fish community structure, and the introduction of invasive species to Lake Michigan, science-based management is necessary to determine correct stocking densities and properly manage recreational and commercial harvest – 18

WDNR Response: *We agree and comment noted.*

Comment: This should have as an objective “to deliver and publish data/reports within one year and the results of those science-based management tools, or be forced to close that fishery in order to comply with Wis. Stat. 29.519(1m)(b)”. Claims of updating databases for whitefish and perch appear false since the last data supplied is from 2008. Sportsmen have been charged ~\$1 million to assess the yellow perch fishery 2009 to present, so what happened to the money, since ‘lack of time’ prevented updating perch SCAA? Are SCAA numbers required for science and management or not? Lake trout limits were reduced because; while having SCAA numbers, the DNR’s estimates as to the number of trout entering the fishery were too optimistic. Same with the 2005 & 2007 GB perch limit increases. Science based management only works if you don’t count your fish before they hatch and grow up, if population estimates are delivered in one year or less and if the DNR act on science and not hope or special interests – 56

WDNR Response: *The Department is committed to using the best science available but sometimes the timeline for a decision does not match the most recent information about a given species. We consider all information collected valuable and it does not have to be related or integrated into a SCAA model for us to make decisions.*



Responses to Comments (cont.)

Vision V. Effective internal and external communication

Comment: Maintaining open communication between the Wisconsin Department of Natural Resources, partner agencies, and stakeholders during multiple project stages is crucial to the success of all aspects of the management plan – 18

Comment: Communication with private owners of riparian property will be especially important to the plan's non-point source pollution and aquatic plant management goals – 18

Comment: Cooperation with the private sector and municipalities will also be required to expand and improve public access along Lake Michigan and its tributaries – 18

WDNR Response: *We agree and comment noted*



TABLE 1. Individuals who provided comments on earlier drafts of the Lake Michigan Integrated Fisheries Management Plan, 2017-2026.

NAME	COMMENT NO	COMMENT TYPE
Mark Bullard	1	
David Zielke	2	
Steve Zajc	3	
Kurt A. Krebs	4	
Kevin Naze	5	
Tom Matych	6	
Dale Buser	7	
Scott	8	
Jason Hoffman	9	
Brian Risinger	10	
Weston Walleye Wagner	11	
Steve	12	
Joel Schmechel	13	
Kyle Wogsland	14	Verbal Public Meeting
Robert Carr	15	Verbal Public Meeting
William True	16	Verbal Public Meeting
Charlie Henriksen (Henriksen Fisheries)	17	Verbal Public Meeting, Written, Email
Paul Schluter	18	Email
Randy Kisley	19	Email
Jim Phillips	20	Email
Dave Zerger	21	Email
Andrew Barker	22	Email
Dr. Kim M. Conant	23	Email
Michael W. Nowack	24	Email
Gerald Nowakowski	25	Letter
Bill Mundt	26	Letter
M. Langlois	27	Letter
Bill Hruska	28	Letter
Kurt Pokrandt	29	Email
Robert Collins	30	Email
Thomas Page	31	Email
Doug Bjorkman	32	Email
Ken King	33	Email



TABLE 1 (cont.) Individuals who provided comments on earlier drafts of the Lake Michigan Integrated Fisheries Management Plan, 2017-2026.

NAME	COMMENT NO	COMMENT TYPE
Larry Van Hoof	34	Email
Scott Fenske	35	Email
Bob Glaeser	36	Letter
Arnie Arredondo	37	Written
Dan Keating	38	Written
Angelo Trentadue	39	Written
John Messina	40	Written and oral
Craig Bender	41	Written
Richard Hehn	42	Written
Bob Gaik	43	Written and oral
Tom Wojnicz	44	Written
Scott Woda	45	Written
Larry Wirth	46	Written
Louis Kowieski	47	Oral
John Apple	48	Oral
Cheryl Nenn	49	Oral
Richard Kempka	50	Oral
Robert Poquette	51	Oral
Gail Clark (M&M Great Lakes Sport Fishing Club)	52	Oral
Scott Poquette	53	Written
Jeff Schaetz	54	Email
Michael J. Unger	55	Email
Steve Alt	56	Email
Bob Retko	57	Email
Sarah Bury (Alliance for the Great Lakes)	58	Email
Donald Philips	59	Email
Ryan Polzin	60	Email
Jeff Prefontaine	61	Email
John Rennpferd	62	Email
Jenny and Stan Kostuck	63	Letter
Ken Polzin	64	Letter
Robert Oseland	65	Letter
Dakota Koepp	66	Email
Frank Yurchich	67	Email
Scott Czechan (Badger Fishermans League)	68	Email
Michael Worth	69	Email



TABLE 1 (cont.) Individuals who provided comments on earlier drafts of the Lake Michigan Integrated Fisheries Management Plan, 2017-2026.

NAME	COMMENT NO	COMMENT TYPE
Tom Koeppe	70	Email
Dennis LaFratta	71	Email
Jeff Hubbard	72	Email
Greg Schwark	73	Email
Thomas Hansen	74	Email
Tim Hansen	75	Email
Erik Hansen	76	Email
Dave and Sue Steimle	77	Email
Dan Peterson	78	Email
Richard Bonini	79	Email
Linda Brey	80	Email
Thomas Lawson	81	Email
Mike Kamin	82	Email
Keith Heberlein	83	Email
Fritz Peterson	84	Email
John Reinke	85	Email
Ed Kakes	86	Email
Dick & Joan Bauduin	87	Email
Mitchell Fisher	88	Email
Eric Haataja	89	Email
Casey Powell	90	Email
Jim Westcot	91	Email
Jonathan Hemb	92	Email
Keith Waloway (M & M Great Lakes Sport Fishing Club)	93	Email
Aric Chaltry (Nestegg Marine)	94	Letter
Clarence Plansky (Manitowoc County Fish & Game)	95	Letter
Tom Kocourek (Northeastern Wisconsin Great Lakes Sport Fishermen)	96	Letter
Thom Gulash (Wisconsin Federation of Great Lakes Sport Fishing Clubs)	97	Email
Bill Kloster	98	Phone



