

Evaluation of Rough Fish Report in SF4062

TESTIMONY WITH REFERENCES

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Dear Chairs Ingebrigtsen and Hansen, and Conference Committee Members,

I want to thank the Conference Committee for the opportunity to comment on SF4062.

I am a “rod and gun” conservationist. I believe that managed hunting and fishing creates advocates who directly depend on the resource. Therefore, I strongly support the Evaluation of Rough Fish report.

Minnesota is home to 143 species of native fish.¹ However, 26 native species are designated as “rough fish”. The “rough fish” are generally species large enough to be caught with conventional angling gear, but not commonly utilized in American cuisine. (Fig 1) The term “rough fish” is defined by state statute (Minn. Stat. 97A.015, Subd. 43) but has no biological justification².



Fig 1. Shorthead redhorse are a designated rough fish.

Reform of the regulations and administrative rules applied to the fish listed in Minn. Stat. 97A.015, Subd. 43 are urgently needed. First, the statutory definition does not include scientific nomenclature making it ambiguous. For example, the mooneye (*Hiodon tergisus*) is not technically mentioned. Second, the statute excludes “any fish species listed as endangered, threatened, or of special concern in Minnesota Rules, chapter 6134.” Unfortunately, Minnesota Rules 6262.0200 Fishing regulations for inland waters, does not include this exemption. This contradiction between statute and administrative rule is prima facie justification for review of current rough fish designations.

If further justification was asked for, eight species of “rough fish” (Longnose Sucker, Goldeye, Mooneye, River Redhorse, Greater Redhorse, Black Redhorse, Blue Sucker and Black Buffalo) are listed as threatened in at least one Midwest state. Several species are listed as threatened by Wisconsin, but Minnesota’s border water regulations are not consistent with Wisconsin’s. Some species, like the goldeye are also considered minnows if less than 7”. Therefore, a goldeye in the St. Croix River is simultaneously a minnow, a rough fish, and a threatened species.

If those, or other rough fish, become threatened in Minnesota it would technically close *all* harvest for them. As a rod and gun conservationist, I support scientific management of these fish which protects both the resources and recreational harvest.

The current regulations for the 26 species of native rough fish are largely unchanged since 1909 (Minnesota Statutes, 1909, Chapter 545, § 2). However, some species have been removed from the rough fish definition, including yellow perch (*Perca flavescens*) and turtles. Most recently, burbot (*Lota lota*), lake whitefish (*Coregonus clupeaformis*) and lake herring (*C. artedi*) were recategorized.

Early management of native non-game fish was preoccupied with the presumed impacts of so called “rough fish” on game fish. However, those impacts have not been documented.^{2,3} In fact, experimental rough fish removals conducted by the Minnesota DNR demonstrated the value of native rough fish to game fish.³ Native rough fish provide many ecosystem services.² They are prey for game fish and birds of prey. They are hosts to imperiled freshwater mussels⁴. They can enhance the productivity of streams⁵. And, they compete with and prey on invasive species⁶. Furthermore, many species of rough fish are threatened in all or part of their range⁷. Seven species of Minnesota’s rough fish are listed as threatened by another state. Researchers are raising concern^{2, 8} and proposing regulatory reforms to address these issues.¹⁶

A growing public awareness of our native rough fish^{10, 11} is creating an opportunity for regulatory reform. The Minnesota Division of the Izaak Walton League of America just passed a resolution calling for reforms to our native rough fish regulations. Adopting new regulations, which balance utilization and protection, will create responsible and sustainable fisheries.¹²

The proposed evaluation of designated “rough fish” is the first step in regulatory reform and should be supported by all Minnesotans, especially those of us who pursue native, so called, “rough” fish.

Thank you,

Tyler Winter

References:

1. Hatch, J. T. "Minnesota fishes: just how many species are there anyway." *American Currents* 40.2 (2015): 10-21.
2. Rypel, A.L., Saffarinia, P., Vaughn, C.C., Nesper, L., O'Reilly, K., Parisek, C.A., Miller, M.L., Moyle, P.B., Fanguie, N.A., Bell-Tilcock, M., Ayers, D. and David, S.R. (2021), Goodbye to "Rough Fish": Paradigm Shift in the Conservation of Native Fishes. *Fisheries*, 46: 605- 616.
<https://doi.org/10.1002/fsh.10660>
3. Holeý, M., Hollender, B., Imhof, M., Jesien, R., Konopacky, R., Toney, M., & Coble, D. (1979). Never give a sucker an even break. *Fisheries*, 4(1), 2-6.
4. Sietman, B., Davis, M., Hove, M., Pletta, M., Wagner, T., Marr, S., ... & Sampson, A. (2017). *Cumberlandia monodonta*—Host enigma resolved. *Ellipsaria*, 19, 18-20
5. Childress, Evan S., J. David Allan, and Peter B. McIntyre. "Nutrient subsidies from iteroparous fish migrations can enhance stream productivity." *Ecosystems* 17.3 (2014): 522-534.
6. Bartsch, M. R., Bartsch, L. A., & Gutreuter, S. (2005). Strong effects of predation by fishes on an invasive macroinvertebrate in a large floodplain river. *Journal of the North American Benthological Society*, 24(1), 168-177.
7. Cooke, Steven J., et al. "Threats, conservation strategies, and prognosis for suckers (Catostomidae) in North America: insights from regional case studies of a diverse family of non-game fishes." *Biological Conservation* 121.3 (2005): 317-331.
8. Scarnecchia, Dennis L., and Jason D. Schooley. "Bowfishing in the United States: History, status, ecological impact, and a need for management." *Transactions of the Kansas Academy of Science* 123.3-4 (2020): 285-338.
9. Scarnecchia, Dennis L., et al. "The Sport Fish Restoration Program as a Funding Source to Manage and Monitor Bowfishing and Monitor Inland Commercial Fisheries." *Fisheries* 46.12 (2021): 595-604.
10. Das Boat Bigmouth Buffalo Season 2 Episode 5
<https://www.themeateater.com/watch/6199187955001/s2-e05-big-mouth-buffalo-with-ryan-callaghan-and-miles-nolte>
11. B-Side Fishing Redhorse Season 2 Episode 3 <https://www.themeateater.com/watch/series/b-side-fishing?playlistVideoid=6282285427001>
12. Cooke, Steven J., et al. "Searching for responsible and sustainable recreational fisheries in the Anthropocene." *Journal of fish biology* 94.6 (2019): 845-856.