

Evaluation of Rough Fish Report: HF4492

TESTIMONY WITH REFERENCES

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Dear Chair Moran and members of the House Ways and Means Committee,

First, I want to thank the House Environment Committee and Chair Hansen for including the Evaluation Of Rough Fish Report in HF4492.

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. Historically, Minnesota has managed fish as either game fish or rough fish. For example, burbot (*Lota lota*) were “rough fish” until this year when they were reclassified as “game fish”. However, “either or” management creates confusion, resentment, non-compliance and erodes management credibility. It is time for Minnesota to create a new regulatory framework that supports, and is supported by, rod and gun conservationists. This 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.

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.

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.

Reform of the regulations and administrative rules applied to fish listed in Minn. Stat. 97A.015, Subd. 43 are urgently needed. First, the statutory definition does not include scientific nomenclature making it ambiguous. 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, the conservation status of these fish in other states, their commercial importance, the increased harvest, and ecosystem services are also pertinent. Lastly, the status and regulations of designated rough fish have never been systematically evaluated, before or after, liberalized seasons and harvest methods were legalized.

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

Lastly, I support and appreciate the work done by the House of Representatives to create this important legislation.

Thank you,

Tyler Winter

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