



Department of
Environmental
Conservation

Assessment of Public Comment Draft New York Sunfish and Crappie Management Plan, 2021 - 2028

Kathy Hochul, Governor | Basil Seggos, Commissioner



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A draft of the New York Sunfish and Crappie Management Plan was released for public review on January 15, 2021 with the comment period extending through February 15, 2021. Public comment was solicited through a DEC press release distributed statewide, and an announcement distributed to all subscribers to the DEC Delivers Fishing Line newsletter [approximately 150,000 recipients].

The draft plan was developed, in large part, to bring attention to New York's panfish resources which have received little directed management over the last 25 years. Current harvest regulations were implemented in the 1990s and were based on what was thought to be equitable and sustainable at that time. Since then, the advent and proliferation of new fishing technologies and social media have improved panfish fishing effectiveness and efficiency. The statewide regulations proposed in this draft plan reflect a recognition by anglers and the Bureau of Fisheries that more conservative panfish harvest regulations should now broadly be considered as conservation safeguards for these resources, while still providing equitable opportunity for ample recreational harvest. There are, however, certain waters in New York that have the ecological potential to provide special fishing opportunities for large panfish with an even more conservative management approach. The proposed Big Panfish Initiative (BPI) was developed to add diversity to New York's panfish fisheries by creating unique opportunities to sustainably catch large sunfish and crappie in select waters. It is conceptually based on (but does not mimic) research and increasingly popular and expanding management programs in Wisconsin and Minnesota – other Great Lakes states with similar climates and freshwater resources and fisheries. The BPI was designed as a 5-year experimental program to be conducted on a few select waters (11 for sunfish, 8 for crappie) distributed throughout the state. The impacts of more conservative regulations on sunfish and crappie population criteria would be assessed throughout the timeframe of the study. Feedback from anglers would also be obtained, as angler satisfaction is a key measure of program success. The Bureau stresses that the BPI is experimental, and there is no guarantee that anticipated improvements in population size structure will be realized. However, because of a growing interest in these types of programs, success with similar programs in other states, and the potential for success in certain New York waters, the possible reward of conducting the BPI experiment to create special opportunities was deemed worthy of the risk.

Ultimately, the implementation and success of both the BPI and statewide proposals are dependent on how acceptable they are to anglers. A recent survey of sunfish anglers provided an initial indication that more conservative sunfish fishing regulations would be widely supported, and this information was instrumental in the development of the draft plan. The release of the draft plan for public review and comment provided an opportunity to more specifically gauge how anglers might view a more conservative and diverse management approach for sunfish and crappie. Comments received will be thoroughly considered in the development of follow-up plans and actions.

A total of 180 public comments were received (Appendix A), and while many of the comments expressed support or opposition for the entire plan, there were also a good number that focused on specific elements or waters. Overall, the plan was viewed very favorably, with all four of the key elements (statewide sunfish, statewide crappie, BPI sunfish, BPI crappie) receiving much more support than opposition (Figure 1). Comments that were specific to the individual BPI waters were more mixed but were also generally more supportive than opposed (Figure 2). It

also appeared that opinions were sometimes based on a misread of the plan or an incomplete understanding of the proposals, as some believed the BPI to be a broadly applied regulation change for many waters, not an experimental program to determine if a small suite of waters can produce larger size sunfish and crappie.

General themes to individual, recurring or similar comments were identified (26 total themes), and responses to these are included below. Comments in support of the proposals are not included in this assessment.

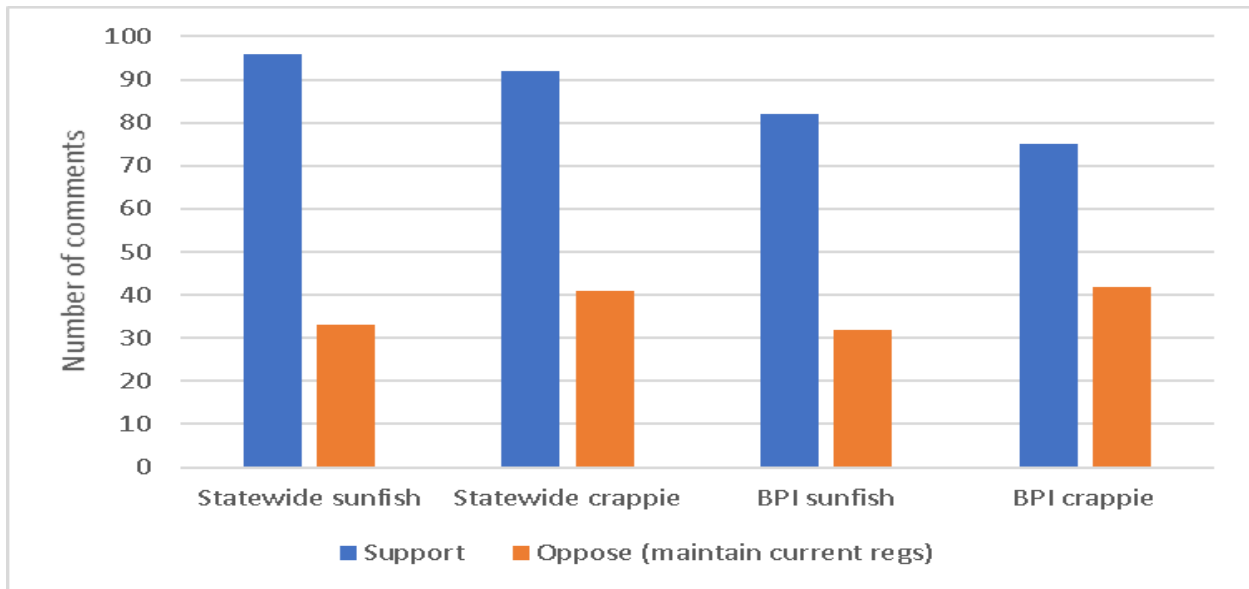


Figure 1. The number of comments in support or opposition for the four key elements of the draft New York Sunfish and Crappie Management Plan. Comments that broadly offered support or opposition for the entire plan were counted for all four elements.

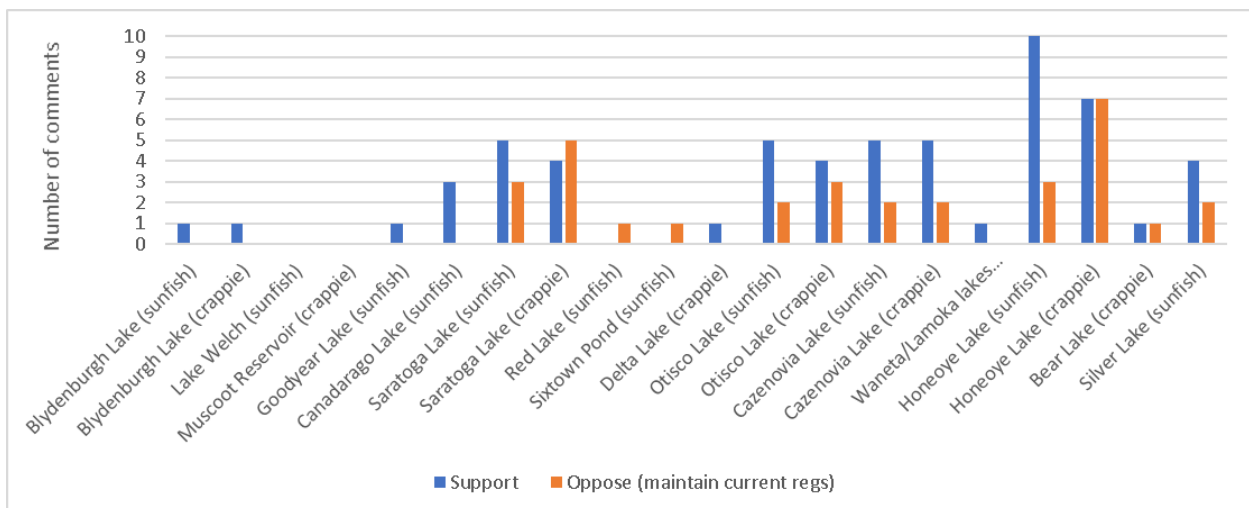


Figure 2. The number of comments in support or opposition for individual Big Panfish Initiative sunfish and crappie waters listed in the draft New York Sunfish and Crappie Management Plan.

Assessment Summary

Based on the feedback received, the Bureau of Fisheries feels that the statewide proposals for both sunfish and crappie are acceptable to the angling public at large and although some anglers disapproved of the proposals no information was provided to justifiably refute a shift to a more conservative approach. The comments associated with the experimental BPI for sunfish were similar and there appears to be fairly wide acceptance of trying to create some special opportunities to catch larger sunfish in select waters across the state. Although the overall feedback on the BPI crappie proposal was also positive, it was viewed less favorably than the other elements of the plan. The primary concern was it would unacceptably restrict the opportunity to harvest desirable size crappie, effectively turning these fisheries into primarily catch and release or “trophy” fisheries.

Theme #1 (22 comments)

This proposal is unnecessary, adds to already complex fishing regulations, and will discourage fishing.

Response

The current statewide regulations for sunfish and crappie are essentially based on what was thought to allow fair and equitable harvest among anglers. These regulations were enacted in the 1990s, before significant advancements in fishing technology and social media that improved fishing effectiveness and efficiency. The Bureau felt that a more conservative set of regulations may now be warranted as a conservation safeguard for these resources in light of these advancements and some feedback received from the angling public. Results from a recent survey of sunfish anglers suggested that the majority prefer a reduced daily limit for sunfish, an indication that such a proposal would garner support. Crappie anglers were not surveyed, but the Bureau believes that a modest increase in the size limit will provide similar safeguards and broadly provide better quality fishing for desirable sized fish. Proposed statewide regulation changes would replace existing statewide regulations and thus will not add complexity. In addition, these proposals should not be detrimental to sunfish and crappie populations and may in fact result in maintaining or improving population size structures, which may encourage angling.

The BPI was proposed as a 5-year experimental program for relatively few waters across the state that have potential to provide unique fisheries for large sunfish and crappie. With this program, the Bureau was creatively trying to provide more diverse panfish fishing opportunities by taking advantage of the ecological capacity of select lakes to provide a special fishing experience. While this would add to the suite of fishing regulations, the Bureau believes that these waters have the potential to become destination fisheries for anglers who seek out larger sunfish and crappie.

Comment Source Numbers: 2,10, 15, 22, 23, 26, 38, 40, 52, 67, 68, 83, 89, 115, 123, 130, 149, 150, 151, 152, 153, 175

Theme #2 (35 comments)

Sunfish and crappie fishing regulations should be even more conservative or different than what is being proposed, such as adding waters to the BPI, implementing BPI regulations statewide,

using slot or maximum size limits, or implementing catch and release regulations for some fisheries that need to recover.

Response

The proposals in the draft plan were developed with the recognition that while sunfish and crappie anglers have diverse interests and behaviors, these fisheries are generally harvest-based. It was important to develop regulations that were not only more conservative, but were simple and easy to follow, were acceptable to anglers, and made biological sense without unduly diminishing fishing opportunity. More conservative regulations may be considered in the future based on the outcomes of the BPI experiment.

Comment Source Numbers: 3, 5, 8, 18, 21, 28, 30, 39, 49, 54, 58, 74, 76, 77, 87, 91, 93, 95, 96, 98, 102, 104, 107, 109, 117, 132, 145, 148, 154, 160, 163, 164, 165, 177, 179

Theme #3 (9 comments)

The proposed regulations will be counterproductive and result in overabundant, stunted populations. There may also be detrimental impacts on other sportfish because crappie are effective fry predators.

Response

A stunted fish population is one that is overpopulated with a subsequent reduced growth rate and high natural mortality, resulting in few fish reaching sizes that are desirable to anglers. It is generally caused by excessive reproduction, insufficient predation on juvenile or otherwise small fish, limited resources, or any combination of these factors. As such, stunting is more likely to occur in waters that are not capable of producing good numbers of quality sized fish and angler harvest is likely to be minimal in these waters regardless of the daily limit. Waters with the potential for producing quality sized fish could benefit from more conservative regulations as angler harvest is generally the biggest driver of adult mortality and size structure in these systems.

Crappie diets are variable, but invertebrates (insects and crustaceans) tend to be preferred and make up the bulk of the diet. A study in Minnesota indicated that fish don't tend to become a prevalent part of their diets until they reach around 10 inches in length (McInerney and Cross 2008). The proposed modest increase in the minimum size from 9 inches to 10 inches would not be expected to substantially change crappie consumption of other fish species. If, as anticipated, larger size classes of crappie become more prevalent in BPI waters under the proposed minimum size of 12 inches, fish consumption by crappie is likely to increase, but we have no way of knowing the extent of it or what the effects might be on other species.

Comment Source Numbers: 6, 34, 79, 83, 85, 118, 121, 134, 144

Theme #4 (32 comments)

The proposed size limits on crappie are too restrictive and will make it very difficult to harvest a worthwhile number. Hooking mortality may also be a problem.

Response

The BPI minimum size limit of 12 inches was proposed only for a few select waters across the state that had characteristics indicating that crappies could grow to that size in numbers that could support a fishery. The proposed increase in the statewide regulation from 9 inches to 10 inches is intended to improve the size quality of fish for anglers in waters that are capable of producing fish of that size. Harvest in unproductive waters where crappies are typically small or stunted is likely limited regardless of what the minimum size limit is because few fish can reach sizes desirable to anglers.

The potential increase in hooking mortality as a result of the proposed increased minimum size limits is not expected to meaningfully increase impacts to crappie populations above current levels because hooking mortality is generally considered to be low for crappies.

Comment Source Numbers: 36, 53, 61, 65, 73, 83, 86, 92, 105, 106, 108, 114, 121, 126, 128, 130, 133, 134, 135, 136, 137, 139, 142, 148, 149, 150, 151, 152, 153, 157, 167, 172

Theme #5 (2 comments)

These proposals will be a problem for anglers who use small sunfish for bait.

Response

The proposed statewide regulation for sunfish does not include a minimum size limit, and with a bag limit of 25/day still provides ample opportunity to use sunfish as bait on waters where they were caught, as required. As a statewide regulation, this would apply to all waters except those 11 proposed BPI sunfish waters where opportunity for using them as bait would be restricted due to the minimum size limit of 8 inches and 15/day bag limit.

Comment Source Numbers: 51, 113

Theme #6 (12 comments)

The proposed BPI sunfish regulations will be detrimental to children who may want to keep what they catch.

Response

The proposed sunfish statewide regulations do not include a minimum size limit and would apply to almost all waters throughout the state. Anglers will not be restricted on the size of fish they'd prefer to keep on all but the few, widely distributed, waters proposed for the BPI. These few waters would be managed to provide a special opportunity to catch larger sunfish for all anglers, including children.

Comment Source Numbers: 10, 32, 52, 67, 83, 92, 112, 124, 149, 150, 153, 165

Theme #7 (4 comments)

The BPI proposals are designed mainly for "trophy" anglers. Where is the demand for a trophy panfish fishery?

Response

The BPI program was designed to provide opportunities to more sustainably catch and harvest large sunfish and crappie in a few select waters that have that potential; it is not necessarily designed to produce “trophy” fisheries. A recent survey revealed that New York sunfish anglers have a wide range of views, interests and behaviors, and New York crappie anglers are likely very similar. The experimental BPI program was designed for those anglers who are willing to accept more conservative regulations for increased opportunity to catch larger fish. The release of this draft plan provided an opportunity for the Bureau to further gauge how anglers would view such an approach.

Comment Source Numbers: 78, 121, 123, 148

Theme #8 (1 comment)

The goal of the plan should be to provide New York anglers with quality size panfish fisheries, not to experiment with important fisheries already of good quality by replacing them (as proposed for crappie) with catch and release fishing for “memorable size” panfish. If it is desirable to experiment, why not do it with a couple 50–100 acre lakes that would be easier to manage and evaluate rather than large public lakes?

Response

The relatively few lakes selected for the experimental BPI program have the potential to provide sustainable harvest opportunities for large sunfish and crappie based on their characteristics. While there will initially likely be more catch and release, the anticipated improvements in population size structure should ultimately provide more harvest opportunities for larger fish. The Bureau recognizes that this program can only be successful if anglers are willing to accept the harvest restrictions in order to realize the potential size structure improvements.

Comment Source Number: 148

Theme #9 (1 comment)

The opportunity for public review of this plan was insufficient. The time period was too short and there should be targeted contact with stakeholders like Lake Associations and area tackle shops to alert them to the proposals.

Response

The time period for reviewing and commenting on the draft plan was the typical 30-day time period allotted for these types of plans. The plan was purposefully designed to be concise, direct, and relatively simple to make it more likely to be read and understood. The draft plan was widely distributed to over 150,000 recipients of a DEC fishing-centric newsletter (The Fishing Line), and via a statewide DEC press release and Facebook announcement. It was picked up by news outlets across the state, lake associations, conservation groups, and popular online fishing forums. While no targeted contact was made, the Bureau believes that distribution of the draft plan was adequate to reach most interested stakeholders. Additionally, commensurate with the State Administrative procedures Act, the public will be able to provide comment on follow-up regulations that may be proposed.

Comment Source Number: 148

Theme #10 (3 comments)

A long-term, data-driven, scientific approach is necessary to appropriately set sunfish and crappie fishing regulations. The plan should not be implemented prior to obtaining a reasonable set of baseline data and a tested sampling protocol. One year of baseline data is insufficient particularly for crappie populations that are obviously year class variable. As it is, the plan leaves too many questions and unknowns and too little supporting information or logic to gain adequate angler support. It is based on a low quantity of angler feedback, studies done outside of New York State, lots of hypothesizing and guessing, and lack of recent netting data for BPI waters to use as a foundation.

Response

The Bureau of Fisheries strives to use science in decision-making processes and the development and implementation of management programs. This draft plan was built on a comprehensive review of the relevant science and similar management programs in other states, angler information (from both general statewide and sunfish-specific surveys), a review of data from the Bureau's Statewide Fisheries Database, reviews of recent Bureau survey reports, and input from Bureau of Fisheries managers and biologists from every Region over the course of 4 statewide meetings and follow-up communications. A program-specific sampling protocol was also developed to assess potential impacts of the proposed regulations in a standardized way. BPI lakes were selected based on information derived from the Statewide Database, the statewide angler survey, and input from Regional staff who are familiar with and manage these waters. Criteria for selecting those waters were largely based on criteria identified in the literature that were related to positive size structure changes due to more conservative regulations.

In short, the BPI program was conceptually based on available and relevant science and similar, successful, management programs that were based on that same science. Statewide regulations were based on the recognition that a more conservative approach was needed in light of new fishing technology and other advancements, and feedback from sunfish anglers indicating support for that type of approach. The Bureau feels that there is enough information to move forward with modest yet meaningful conservative adjustments in statewide regulations for sunfish and crappie and survey results bear this out. We also feel that there is merit in conducting an experiment to determine if a conservative management approach in a few select waters could provide anglers with a unique opportunity to catch larger fish.

There also seemed to be some confusion or a misunderstanding about the how the draft plan was developed based on its brevity (although there was one comment (37) suggesting it was too long and that most reviewers would not want to wade through the entire plan). The draft plan was purposefully designed to be a concise, direct, quick reference of the key pieces of information and processes that led to the proposed objectives and actions. This was done to encourage review and use of the draft plan by anglers. The Bureau appreciates the questions and concerns that may have arisen due to the concise nature of the draft plan and will consider adding detail, explanation, justification or taking an alternative approach if warranted.

Comment Source Numbers: 148, 166, 170

Theme #11 (1 comment)

Explain the basis for believing that NY anglers' views and values include "special opportunities" to catch large panfish in suitable waters.

Response

The results of a recent survey of New York sunfish anglers indicated that they have very diverse views and behaviors and thus appropriate management of these fisheries perhaps should better reflect that diversity. There was a high percentage of responses that indicated that maximizing harvest up to the daily limit was not a motivation, and many respondents indicated that they preferred to harvest larger sunfish. These results suggested that sunfish anglers may be open to more conservative regulations such as reduced daily limits or minimum size limits to maintain or improve sunfish populations in certain waters. Also, the success and increasing popularity of similar programs in the Midwest has piqued the interest of some New York sunfish anglers who have expressed interest in implementing these types of programs here. Releasing the BPI proposals in the draft plan for public comment provided another opportunity to gauge public interest.

Comment Source Number: 148

Theme #12 (3 comments)

The studies cited in the Literature Review are not adequate to justify regulation changes as they were conducted on small lakes in the Midwest and may not be applicable to the BPI waters proposed in NY.

Response

The literature on the impacts of restrictive harvest regulations on sunfish population size structure is limited, and the most current and relevant comes from the Midwest. This research was used to develop and justify similar, and increasingly popular and expanding, management programs in the Midwest. The BPI was conceptually based on this research and management programs, with the derived information providing useful guidance in the development of the BPI. There was no intention to repeat those studies here in New York or mimic Midwestern programs. The BPI represents a unique opportunity to study how conservative regulations affect sunfish and crappie population structure in New York waterbodies that were selected using some, but not all, of the same criteria and characteristics that were important in the Midwest. This program provides an exciting opportunity to learn much about sunfish and crappie management here in New York over the next 5 years, which will help guide future management decisions.

Comment Source Numbers: 148, 166, 170

Theme #13 (2 comments)

The plan should be adjusted to make background information more readily available and understandable to anglers, and to more clearly articulate objectives, actions and measures of success to provide anglers with a clearer means to assess the merits of the plan.

Response

The presentation and clarity of the draft plan will be evaluated and adjusted if necessary for follow-up documents.

Comment Source Numbers: 145, 148

Theme #14 (2 comments)

The statewide sunfish objective seems to be currently met and does not provide support for a change in fishing regulations (add size component?). Explain why a statewide reduction in crappie creel limit would not be helpful in distributing harvest and improving population structure.

Response

The statewide sunfish daily limit reduction was primarily proposed as a conservation safeguard and better reflects current angler views and values. It is intended to reduce the risk of population impacts due to overharvest in those waters where it may occur, and not necessarily result in improvements to population size structure in waters across the state. As such, providing sustainable sunfish fishing opportunities throughout the state is the appropriate objective. A study conducted in Wisconsin simulated the effects of daily limit reductions and minimum length limits on black crappie harvest using data from 263 creel surveys. The authors concluded that daily limits would have to be reduced to 5/day to effectively reduce harvest. However, implementation of 9 inch, 10 inch and 11 inch minimum size limits were always predicted to reduce harvest (22–93% reductions) and increase mean length of harvested crappies (0.5 – 2.4 inches) compared with no minimum length limit. The 10 inch and 11 inch minimum length limits were predicted to improve mean lengths of harvested fish by >1 inch. These effects are more likely to be seen in waters with high angler harvest and low natural mortality. A modest increase in the statewide minimum length from 9 inches to 10 inches was believed to be a more socially acceptable approach than a drastic reduction in the daily limit that may not be acceptable to the angling public.

Comment Source Numbers: 145, 148

Theme #15 (1 comment)

It would help obtain angler support if you could reference actual NY example(s) of where liberal bag limits and intense harvest have had impacts on population structure.

Response

Unfortunately, targeted studies assessing impacts of intense harvest on sunfish or crappie population structure in specific waters have not been conducted in New York. Modeling simulations using data from New York and other locations have been conducted to evaluate the

effects of exploitation on the structure of panfish populations. Results indicated that the size structures of both crappie and sunfish populations would be reduced even at moderate levels of angler harvest. Management recommendations included reducing harvest to maintain good size structure. Adding information from this modeling exercise will be considered for follow up documents.

Comment Source Number: 148

Theme #16 (2 comments)

Is it appropriate to set population size structure goals on “sunfish” as a group? These species can differ substantially when present in the same lake.

Response

There may be population size structure differences among the three main species of sunfish (bluegill, pumpkinseed, redbreast sunfish), but differences are not consistent. There can also be a high degree of hybridization among these species in some waterbodies, making identification difficult and species-specific regulations impractical.

Comment Source Numbers: 53, 148

Theme #17 (1 comment)

Criteria for lakes includes “fast” growth and Saratoga Lake is listed as n (no?) in Appendix A. Why is it included as a study water?

Response

Saratoga Lake was selected for the BPI because it is a popular fishery for sunfish and crappie, sunfish are already managed under a special regulation to maintain a desirable size structure, and quality size sunfish are prevalent (based on a 2015 fisheries survey). Age data are lacking for both sunfish and crappie and the growth categorization for both species groups should more appropriately be “unknown”. The inclusion of Saratoga Lake in the BPI will provide an opportunity to obtain current age and growth data and monitor potential changes through the next 5 years.

Comment Source Number: 148

Theme #18 (1 comment)

Why is the proposed BPI length limit for sunfish preferred size 8” rather than memorable size 10”, while the minimum limit for crappie is not preferred size but memorable size 12”?

Response

The difference in the size categories between sunfish and crappie were based on anticipated changes in population size structures and meeting population metric objectives in BPI waters. For crappie, raising the minimum length from 9 inches to 10 inches was anticipated to result in modest population size structure improvements, and thus this option was selected for the statewide proposal. An increase to 12 inches was anticipated to more dramatically improve size

structure and meet population metric objectives. For sunfish, studies have shown that daily limits need to be reduced to 10 or even less to result in population size structure improvements. The combination of 15/day with an 8 inch minimum size was selected as an experimental approach to realizing similar improvements here in New York.

Comment Source Number: 148

Theme #19 (1 comment)

If literature and modeling indicate that implementing length limits at preferred size (10 inches for crappie) also substantially increases proportion of memorable size crappie, why is that not a sufficient approach to improve size structure and continue to allow a reasonable harvest?

Response

Implementing a 10 inch minimum size limit for crappie is expected to result in more sustainable opportunities to harvest preferred (not necessarily memorable) size fish (the statewide objective). The BPI waters were selected because they have the potential to provide sustainable opportunities for memorable size (12 inch) fish, and more conservative regulations were selected as an experimental approach to attaining that objective.

Comment Source Number: 148

Theme #20 (1 comment)

If creel reductions are not seen as an effective means of improving crappie population size structure in the statewide regulation proposal, why is a reduction to 10 fish included in the BPI rules?

Response

Creel reductions may be effective in improving crappie structure, but studies suggest that limits would need to be reduced to 5/day for those changes to be realized. For the BPI, a 10/day limit combined with a 12 inch minimum size is intended to provide for more equitable and sustainable harvest opportunities for memorable size crappie. This experimental set of regulations was planned to be evaluated over the 5 year study period.

Comment Source Number: 148

Theme #21 (1 comment)

How is it known that current levels of “angler satisfaction” are not already at the 66% target under the existing management approach in BPI waters? Are there any “pre-rule change” surveys planned to compare future angler satisfaction values?

Response

The angler surveys are planned to gauge angler satisfaction with the experimental BPI program. No pre-rule change angler surveys are planned, but the Bureau will consider including questions in the planned surveys to determine if the BPI has resulted in fishing improvements for these anglers.

Comment Source Number: 148

Theme #22 (2 comments)

Evaluation procedures don't adequately describe the timeline and decision-making process. The effort described for gear type comparisons will not be enough to determine differences between types. Why are existing centrarchid sampling protocols not sufficient to monitor size structure and catch rates (relative abundance)?

Response

The Bureau will consider adding clarifications to the timeline and decision-making process in follow-up documents. The trap net/fyke net comparison is considered a limited pilot study to obtain some information on the relative capture efficiencies of both net types for various size classes of sunfish and crappie to determine if fyke nets can be used as a suitable alternative to trap nets. The pilot effort should provide enough information to determine if a follow-up comparison is necessary or if the sizes of fish captured are clearly different as anticipated. The Bureau's standard "centrarchid" sampling protocol is a boat electrofishing protocol designed to sample black bass and sunfish. Crappie are typically less vulnerable to capture by boat electrofishing and there was concern that this method was not going to be effective in many waters. Crappie are more effectively and commonly sampled using trap or fyke nets and sunfish can also be effectively sampled with this gear. For enhanced efficiency, a program specific standard protocol was therefore developed to sample both sunfish and crappie populations using the same gear at the same time of year (trap nets in the spring).

Comment Source Numbers: 145, 148

Theme #23 (3 comments)

The online sunfish angler survey did not follow appropriate survey standards and should not be considered a valid representation of angler views. Creel surveys are necessary to determine angler use and opinions.

Response

Online surveys (along with many other forms of communication) are commonly used by fisheries management agencies to obtain angler information to aid the decision-making process and develop programs. The Bureau was seeking to obtain a better understanding of the current views that New York anglers have about sunfish as a recreationally important species. The Sunfish Angler Survey was comprised of six simple, straightforward questions about sunfish fishing behaviors and preferences, and was sent to about 150,000 subscribers of a fishing-centric DEC email newsletter (The Fishing Line). It received substantial secondary distribution via news outlets, lake association newsletters and online fishing forums. Anglers who took part in the survey did so voluntarily, just as they do for other surveys. The survey received over 1,400 responses, which was considerably more than recent, similar angler surveys conducted in collaboration with the Cornell Human Dimensions Research Unit of black bass anglers (746 responses) and baitfish users (341 responses). The large majority of respondents (84%) indicated that they had recently fished for sunfish in New York, which was the targeted demographic for the survey. The survey served its purpose to provide the Bureau with a better understanding of the views of New York sunfish anglers, and the results appropriately helped

guide the decisions that were made in the development of this draft plan. There is no reason to think that the results are invalid or not useful.

Creel surveys are an important means of collecting information on angler use and opinions but are time consuming and costly. Current Bureau capacity limits the use of creel surveys to only a few individual waterbodies at this time. The Bureau will continue use creel surveys to obtain information if warranted and practical.

Comment Source Numbers: 127, 166, 170

Theme #24 (31 comments)

The Department should consider adding elements to the plan, including reduced daily limits for yellow perch and a prohibition of commercial sale of panfish. A statewide 7- or 8-inch sunfish limit would negate commercial sale of these fish and probably have much more impact on overall panfish quality.

Response

Yellow perch management will be addressed separately from this draft plan. Commercial sale of panfish has been a longstanding concern of anglers and the Bureau as it increases the motivation to harvest large numbers of fish. However, attempts to legislatively prohibit the sale of panfish have failed in the past and moving forward with such a dramatic change would risk making progress on other practical and obtainable conservation measures. The statewide sunfish regulation proposal in this draft plan is designed to moderate situations where overharvest may occur, and the more conservative BPI sunfish regulations will go even further on those high-use fisheries. While commercial sale of sunfish won't be eliminated with this draft plan, positive steps will be taken to lessen the potential impacts.

Comment Source Numbers: 1, 14, 16, 17, 19, 24, 44, 53, 56, 57, 60, 64, 70, 71, 88, 96, 97, 100, 128, 147, 148, 155, 159, 160, 162, 164, 165, 172, 174, 177, 178

Theme #25 (6 comments)

Panfish harvest regulations should be based on waterbody size and amount of habitat. Educating anglers on how the size of the waters being fished impacts the sustainability of sunfish harvest would be a more successful and acceptable approach. Management efforts should focus on habitat protection.

Response

The primary drivers of the success or failure of fishing regulations designed to improve panfish population structure are growth and mortality. Studies have shown that conservative regulations can be successful even in smaller waters if growth is fast and angler harvest is reduced. If implemented, the BPI experiment will provide additional insights on the effectiveness of conservative regulations under a variety of waterbody and habitat types. The Bureau has and will continue to protect aquatic habitats through permit review.

Comment Source Numbers: 10, 35, 79, 89, 144, 161

Theme #26 (22 comments)

Other – reduce littering; mats used to control vegetation were placed over spawning beds; increase enforcement of regulations; reducing bluegill harvest will result in increased Eurasian milfoil density; impacts of chain pickerel on panfish populations; cormorant management; climate change; invasive species; increase access; control panfish in Adirondack trout waters.

Response

These comments are largely outside the scope of the draft plan. The Bureau of Fisheries has and will continue to work on and advance matters that are in the best interest of our fisheries resources.

Comment Source Numbers: 20, 29, 33, 47, 49, 63, 66, 71, 81, 84, 93, 101, 103, 106, 116, 121, 129, 148, 165, 171, 172, 176

Appendix A: Public Comments

1. I took a look at the Sunfish and Crappie Management Plan. I think it is outstanding that DEC is looking at this closer. I've personally watched some local waters get decimated by overfishing. I agree with everything in the plan. I think this will give more anglers an opportunity at better quality fish and still allow plenty of fish for the table. I think the lakes you selected for specialized management are spot on, I'm very excited to see the results of this initiative. The only thing I might suggest adding is something on yellow perch, unless this is being addressed elsewhere? I think the 50 fish limit is high, in most cases there is no need to keep over 25 perch. People that keep more, often times give them away, sell them, or let them get freezer burned. Reducing the bag limit would make the practice of "tripping", where anglers make multiple trips to exceed the limit more difficult. Selling perch is practiced by a small fraction of the fishing community but I believe it takes a toll on perch populations, particularly on smaller lakes – taking 50 jumbo perch repeatedly out of few hundred acre lake is not good management in my opinion. I am not as concerned about the larger waterbodies like Erie and Lake Ontario but really anything else should have smaller bag limits in my opinion.
2. The current regulations are fine. I oppose any additional stringent regulations on both bluegills or crappies. Maybe those individual waters need those regulations but a statewide bag limit decrease is UNCALLED for.
3. Upon review of the NYSDEC proposed changes to the panfish regulations, I would like to offer the following comments:
 - I am 100% in favor of reducing the statewide daily limit of sunfish from 50 to 25.
 - I am opposed to increasing the statewide crappie limits from 9-inches to 10-inches, but would be highly in favor of instituting a revised slot limit (see below).
 - Regarding the BPI. Slot limits have proven to be effective in both providing adequate fishing and harvesting opportunities of all species all across the country, yet the

NYSDEC continues to simply use a "minimum size" system except in very select bodies of water.

- Large bluegills (10-inch plus) are crucial to the populations, especially in smaller bodies of water and need protecting. Establishing a slot of only keeping them between 8-10 inches would be much more beneficial in establishing trophy style fisheries. Maybe only allowing a single fish over the 10-inch slot.
- Big crappie (14-inch plus) are also a valuable resource and should be protected. Maintaining the 9-inch minimum would be preferred, however maybe a sliding scale within the 25 fish limit for example "No more than 15 may be under 10-inches, and no more than 5 may be over 12-inches" Thus creating an effective slot of 10-12 inches which is the best class for eating anyway.

I like that the DEC is taking an initiative in protecting the panfish populations, especially with the recent increase in ice fishing participation. However, I think simply raising size limits, and lowering creel limits is not the right approach. Yes, slots are more complicated, but in the end provide the diverse fisheries we need.

4. I am in big favor of the proposed management plan. I fish all over NY, but I live in region 3. I am 50 years old, and I've seen major technological advantages in ice fishing and regular fishing. I don't see any reason to keep 50 fish a day. Hopefully this goes through. Thank you for trying make fishing even better.
5. Just wanted to comment on the sunfish and crappie management plan. I have always thought the limits on sunfish/perch/crappie have been too high. I suggest 20 for sunfish and perch and 10 for crappie on all lakes in NY.
6. Not a fan of the new proposed panfish regs! I am all for bigger panfish. That would be great. But so many of these lakes have gills and crappies that are overpopulated and a bigger size limit would IMO do exactly the opposite. Lakes like bear lake there are tons of 8-8 1/2 inch crappies. Tons. They are stunted. Increasing the required size limit seems like it would be counterproductive.
7. Hello, I would just like to express my thoughts on this situation. I believe it is a **very good** idea. I fish cazenovia lake very frequently. There are many bluegill but never get a chance to grow and believe reducing the limit would be very beneficial. No one needs 50 fish per day in my opinion. I hope this plan goes though easily. Thank you.
8. I have read the Pan fish initiative proposed plan. I like the direction that this idea is going but I think the DEC should consider a slot limit for all species. But i feel that the larger fish need to be protected not encouraged to keep because they are the smallest population in all species. the younger fish are the largest population and should be deemed as the eater fish. The top tier fish are the breeding fish so protecting them would increase survival rate of their eggs. Especially in the Sunfish species. The big bull sunfish protect the nest when the eggs are laid. They are important to protect. A slot limit achieves both goals. Protect the larger fish that are great breeders and the smaller fish that need to grow and serve as food for predator fish. I think the state should propose a slot limit for the following species:

Sunfish 6"-8" Over 8" gets released 25 per day
Crappie 9"-12" Over 12" gets released 15 per day

Perch 8"-11" or 9"-12" Over 11" or 12" gets released 25 per day where perch aren't over abundant like East Lake Ontario.

Walleye 15"-18" over 18" gets released 3 per day on Oneida and finger lakes - 5 per day on Ontario and tributaries with a larger slot limit on Ontario Maybe 15"-20"

I know the walleye species aren't in the panfish category but there has been discussion of changing the regs on them as well so I mentioned them. The proposal I made for slot limits would help all lakes mentioned in the proposal as well as other larger lakes in the state. We see every few years lakes have up and down age classes of fish with a slot limit and lowering the daily bag limits this would help keep the up and downs from happening as frequently from over fishing.

9. I agree with the 25 sunfish statewide but without size limits. I have harvested many nice bull bluegills under 8 inches that provide good fillets I don't keep any females! I agree with a 10 inch minimum on crappie (currently that is my choice). Personally a 9 inch crappie is a non eater! The 25 limit is also reasonable but i don't often approach it!
10. Is this the ploy to keep ice fisherman from fishing Caz? Summer fishing pressure is non-existent so it has to be. I can see increasing the size on crappie as a 9" fish really doesn't give you much of a fillet but sunfish and bluegill? Really? Quit killing of weed beds. Caz was better than it is now when we had them but in recent years it's pretty void in certain areas but once you find the weeds you find the fish. I can imagine it's similar in other locations. Sorry kids we can't keep any sunfish or bluegill too short. Ridiculous I also fish Oneida, Owasco, Skaneateles, Ontario and Sandy Pond and spend plenty of \$\$ annually but won't bother as much if cuts continue. Leave the perch alone too. Lakes I fish have the bottom covered with small perch already.
11. Do it good proposals
12. I am in support of these regulations. Feel free to contact me if any questions. I am the president of Alma rod and gun club. Beaver lake located I. Alma ny can benefit a great deal from lowering daily limit. And increasing the size of crappie and sunfish
13. As a resident and fisherman on Otisco lake I welcome the proposed Sunfish/Crappie regulations for the lake. These new regulations are really needed for the lake.
14. 25 is a reasonable number for any panfish. 10 inches sounds good for the crappie limit. Along with size and bag limits for panfish they should Stop the sale of any freshwater fish Caught in NY. The pirates are going nuts with the numbers they take. Also make the fine substantial. \$25 Minimum.... for each fish over the limit or under the size limit.
15. Leave present rules stand. Been working fome.
16. Please add a perch season to perch, to stop selling of the fish. April 2th to March 1st. I believe the selling of perch has hurt the population.
17. Outstanding proposal! I'm in full support of all proposed changes. However, I would like to see some changes in the future with regards to the sale of panfish and other species, particularly during ice fishing season. I do believe that there is a significant impact on

these species due to the anglers ability to profit from their harvest. Great work on the proposal !

18. Why are none of the finger lakes chosen for the big fish program? The north end of Keuka lake almost produces what this plan is after. Maybe the decreased limit would help, but my guess would be that it would show the quickest turn around. Trophy size bluegills and sunfish are caught here regularly, implementing this plan would seem to help even more.
19. I'd like to express my feelings on this plan. I fish 12 months out of the year for crappie, perch and bluegills I keep few gills because they are too small. I just fished LOTI other day nothing but 7.5 inch gills that's too small for me to keep. I used to be a market fisherman. Best thing they did in ST Lawrence county was to put a stop to selling fish. Crappie size went from 7-8" to a nicer size in black Lake but you still wind up with way too many 9" barely legal fish I'd love to see the size changed 10" statewide and put an end to selling all panfish they are buying 7" perch in Chaumont?? Come on you can read a newspaper thru the fillet and people from the surrounding counties where they have size and limits are selling fish in Jefferson. All of the small lakes I used to ice fish near me are now fishless
20. Hello, as an avid outdoorsman I appreciate the DEC giving us the opportunities to ask our opinions and voice our concerns over proposed regulation changes. This one in particular I 100% support, lowering limits to keep and increasing the size restrictions on panfish will hopefully increase both the overall populations of fish and the size of the fish. I've lost count of the amount of people that I've spoken to at the local hot spots in my area that all talk about how it "used to be", but none of them seem to want to understand why there's no more 14"+ crappies and big bull bluegill and sunnies anymore, even though they themselves talk about taking buckets of those fish home to eat. So with that said I feel that these regulation changes are necessary to regrow and maintain healthy populations of panfish statewide. The only other thing I'll comment on is that if you make these changes in regulations then the DEC really needs to patrol high-traffic and known fishing spots to enforce them, the local winter trout tributary regulations were changed last year and not only did very few people seem to know about them, but I saw more than a few people keeping undersized fish and over their limits due to the regulation change. I understand that the ECO's are spread pretty thin across the counties and state, but if there's no enforcement of these new regulations then none of them matter. I've done my part in calling people in but nothing ever seems to get resolved, and I'll continue to do my part but the DEC really needs to step up in enforcement.
21. I think this is great! You may want to add Loon lake to your list. In the past 5 years it went from my favorite place for big crappies too maybe you'll catch some crappies. It was kinda of a secret spot for some time but has gained popularity!
22. Leave the regulations as is or better yet reduce them to NONE. I buy a non-resident CT Fishing License each year (\$55) because that state does not OVER-Regulate it's Panfish Take Regulations. Additional Regulation has always been New York's downfall in so many realms.

23. My opinion is that this would be just another NY overstep in ridiculous rules & regulations. It's time to reduce those things that discourage fisherman from participating in the sport.
24. I believe that there should be a limit on especially blue gill and pumpkin seeds because what I saw at Chautauqua lake was brutal. I seen people fishing the docks leaving with five gallon buckets filled with blue gill and as i know them sunfish. They didn't care about the size and some of them were barley big enough to be bait for bass. They were taking not only that years fish but also next years and the years after that. Granted it is a lake but if I seen that there from seven people I could imagine on a macro scale it is devastating to the populations. At the very least set a size limit of 7 inches or close to the legal size of perch to ensure the careful balance of nature. I was genuinley concerned about their habbits and felt outraged. I wanted to yell at them but it wasn't my place nor was I knowledgeable enough about the fish population in the lake but still it seemed ridiculous to me. That is not respecting nature and being greedy by depriving not only nature but other generations of anglers of great catches. Thank you for your time and taking this into consideration. I would love to hear back from you and get some feedback.
25. This plan represents a great improvement over the current situation. I am looking forward to great results from the BPI.
26. There is over population of sunfish and crappie now why would you change it because you have poeple that don't know what to use to catch fish I am 68 years old and I live in auburn NY and I have no problem catching fish in the lakes. have a lot of fish in them
27. i was just reading the new sunfish and crappie proposals , I am 110% in agreement with everything . i personally think this is the right move from the things i have seen on these fishing forums and the things i have witnessed on Canadarago lake . Kudos to you and all the DEC staff . Have a happy healthy new year and stay safe , great job.
28. Please..... 100 percent yes on this proposal. Glad to see something like this coming to light and be talked about. Needs to be done on more waters in my opinion. Thanks.
29. My research indicates that reducing the catch limit on Bluegill will increase the amount of Eurasian watermilfoil in a lake. Young-of-the-year Bluegill will eat herbivore insects off of the Eurasian watermilfoil protecting the plant and facilitating its canopying. Eurasian watermilfoil control should be part of the Bluegill management plan. I would be happy to discuss this issue with anyone interested.
30. As a person who fishes Otisco lake I would highly recommend that the proposed size limit and in particular the daily limit be accepted. I watched as up to twenty boats daily swarm over the one or two acre sized areas in the spring for weeks wiping out the crappies until they are gone and then the boaters go to other lakes. I assume the supply of fish does not recover easily after these types of depletion rates. Actually there are definite years when the fishing for these fish are tough and I fish almost daily. There is also fisherman that clean up the large bluegills and sunfish before and after the spawn. I've seen spend several days a week doing this. With people home last year the fishing traffic was three times what it normally is during the spring months. Anyway I am glad to see that you are taking some action to possibly make the limits a regulation. Its

too bad you cannot have a slot size on the crappies so the over 13inchers go back with the under 10 also.

31. I am worried about unintended consequences regarding panfish changes – Primarily the bluegill portion. I read the survey and although I choose to keep between 20 – 30 fish doesn't mean that I think that should be the limit. I hope you have put more thought and asked for external insight into this than just making a proposal that looks good on paper to a few vocal proponents.
32. YOU PEOPLE ARE shutting children out of the outdoor experience with all your REGULATIONS for crying out loud .No child can catch a salamander , snake or turtle because it is against the REDICULOUS LAW and now you want to make it illegal for a kid to catch a little fish and put it in a BUCKET TO TAKE HOME TO SHOW MOM. REDICULOUS YOU PEOPLE ARE REDICULOUS
33. blah blah blah. if you knuckleheads want to help the environment, you could make a huge impact by clamping down on littering. people empty their ashtrays in parking lots, throw shit out their windows. everything that is thrown like that ends up in drainage which isn't controlled or filtered and then into spawning grounds where all the little fishys can have the last haul off a fag.
34. Hi silver and honeyoye are the lakes that I fish the most often and I agree with lowering the daily limit there's no reason to keep that many fish but as for the size limits I think that's taking it a little too far 7 inch blue gil are alot more common then 8+ and them getting stunted from less being caught will probably just make it harder to catch larger ones I'd rather see a max size you can keep of 10 or 11 so that the big breeders get put back in and all the smaller ones can be kept. Thanks
35. I would like to reply on the new regs for blue and crappie, being a resident off Honeoye and an avid pan fisherman, I would love to see the limits on blue gills for sure, 15 fish is a bit light as you know this lake produces great catches of gills with some trophy class fish, I think the 8" minimum is great but as a blue gill factory, hope the light bag limit does not lead to stunted gills, as far as crappies, a 12" minimum on crappies is a stretch for this lake would like to see it at 10, also, I have noticed a very low weed base at the south end during fall and winter month, per weed cutting later in the summer, it definitely has an impact, as you probably know the east shoreline loses most weeds through out the fall and winter month which reduces habitat. Thank you
36. I am all for all of the proposed new regulations on sunfish and crappies with the exception of the 12" minimum crappie on the listed lakes. I do believe that the minimum legal length should be higher on those bodies of water but I feel that 12" is a little too much. In my opinion 11" would strike a better balance between allowing people to keep fish and helping lakes grow trophy sized fish.
37. I think the plan is sound and good but I am a totally catch and release fly fisher so as far as I am concerned the bag limit could be one or a hundred and size big enough to fillet. I finally took the time (3rd try) to go through the proposal but strongly believe that the DEC should put out a easily read summary in addition to that draft. I'm convinced that in today's enviroment, few people are going to go through the many pages of "boiler plate". and give up. I eventually skipped to find the meat at the end of the proposal. I feel the DEC should publish only the last couple pages where the details are presented. IF

they want ALL the details, research and background, then they can read the entire thing. Sorry for the wordiness, and that is just my opinion.

38. I like the limits the way they are. I catch tons of quality panfish every time I go out, nearly everywhere I go, regardless of how hard it was pounded by others all winter.
39. I think that the new catch limit is the best decision you guys could make. Personally I think the limit should be lowered on every lake besides the great lakes or st. Lawrence. When the limits were decided fish finders were no where near what they are today, people are doing a number on the fish. And it's about time that you will be able to Target trophy fish on heavily pressured lakes. I've always said people are like locust, they swoop in and destroy everything lol
40. I disagree with the whole plan, just leave it like it is.
41. I approve of the strategy of lowering the creel limit (25 fish, or preferably less, per day) and increasing the size limit (10-in or greater) of legally harvested fish. Overfishing these species, and harvesting immature fish, runs contrary to good management practice.
42. I vote in having this plan due to the fact of these species being over fished and not grown to full potential in these areas to get trophy fish in good numbers in this body of water
43. i like the overall new draft proposals
44. In my opinion I think the selling of panfish, including perch is probably the biggest problem. The anglers that sell the fish don't stop at limits. They are out there to make a buck and they are out every day cleaning out lakes and ponds just to fill their pockets with money not supper.
45. I am definitely in favor of the crappie size limit and the daily catch limits. I used to fish Cazenovia lake when I lived in Syracuse some 20 odd years ago and the fishing was phenomenal. I recently fished there and got all dinks. It would help to if the DEC was more prevalent at Cayuga lake state park and Honeoye lake during the spawning period as countless over limits are being taken by several anglers. I also agree with the sunfish size and limits as well. Just unsure if that included bluegills as well?
46. I am all for it! I love the idea and have seen the results of other states doing it. And Cazenovia lake Is perfect for it! If there's somewhere else I'm supposed to leave my comments and opinions on this please let me know. I was really hoping people would push for a slot limit on Oneida to get some bigger walleye. When they talked about upping it to 5 per day 15" 2 18"+ and 3 15-18" maybe 20" but that would even make the difference! In future size.
47. My question to you folks is this going to be limited to just the areas noted on here or all NY waters? I personally fish the lakes and ponds in the Adirondacks and these water ways have trout, and panfish are a big problem. They not only reproduce at a higher rate than the trout, hence crowding the trout out. I feel there should be no limit on these waters and should never be released back into the water ways. I personally kill them and throw them back for the turtles. This way they aren't wasted.

48. I am all for a size limit and quantity limit. I live at Conesus Lake and involve myself in fishing and scuba diving. There has been a drastic decline in population and size. They need our help. Less cold = less ice= more fish? I am available for any questions.
49. Hello, I am a very avid crappie angler and I would love to see the daily harvest decreased to 10 or 15, and the size limit adjusted to 10". I feel that this would help greatly in preserving fisheries in New Your State, however I feel and this is only my opinion but these rules and regulations need to be enforced with a stronger DEC presents on these fisheries. I have seen many people keeping undersized fish and over their limits, have reported the incidents but nothing gets done. I believe strongly in the DEC but feel that there is not a big enough presents on the water to prevent over harvesting and keeping undersized fish. I'm on board with this and strongly support it, thank you!
50. I really like this new proposal. Many of the smaller lakes cant withstand the current regulation harvests. Silver Lake is really in dire need of these regulations. Just wish it was done sooner. Thank you
51. My only concern is that this may impose problems for fishermen who catch small panfish to use as bait for big fish. I think that fish smaller than 6 inches should be allowed to be kept alive for bait provided they were caught on a hook.
52. UNBELIEVABLE! IS THERE ANYTHING IN THIS DAMN STATE THAT ISN'T "REGULATED"?? ...NOW KIDS ARE GOING HAVE TO WORRY ABOUT BEING TICKETED BECAUSE THEY HAVE TOO MANY SUNNIES, THEY'RE NOT BIG ENOUGH AND THE LIST/LOCATIONS GO ON AND ON!! For crying out loud some kids are fishing before they can properly read the ever expanding rules and regulations put out by NYSDEC! NYSDEC.....this wasn't broke, but by golly you people had to step right in and "make it better".....BALONEY! Kids and too many anglers don't even know how to tell the difference between a Crappie and Pumpkin Seed, Blue Gill, etc, etc. and even your biologists often have a hard time, yet you feel it necessary to bring the youngsters under your far reaching microscope.....and of course we all understand it's for the betterment of the species and overall integrity of the sport called "pan-fishing" ...SERIOUSLY ! To sum up mu comments.....leave it alone, go back to your desks and find something that really does need to fixed!
53. I just reviewed the proposed changes to the panfish regulations. I'm conflicted. Overall, I see the changes as a good thing, but I'm not in favor of what you propose for Cazenovia & Otisco Lakes. Specifically the crappie regulations. Going from 25 to 10 seems way too extreme. Otisco has such extreme weed growth it can only be fished effectively for 4 - 5 months a year. I can't see where that many keeper fish will be harvested in that time. As for the size limit. I believe 10" is fine. I take my grandson out on Otisco for legal, edible crappies. A 12" limit kind of defeats our objective. I appreciate a sustainable fishery, but we don't need a trophy lake. 15 or 20 at 10" seems more reasonable. I know that the growth rate of a bluegill is painfully slow. So I understand some the proposed changes there. What I would like to see is a separation between bluegills & sunfish in the regulations. Maybe 15/25. The adult sunfish populations seem strong in the lakes I target fish them. I can't say that for the bluegills. Finally I believe there needs to be some changes for the sake of the fisheries. Yes, there are some skilled anglers that 'take advantage ' of their skills. And that includes the ones that sell their catch. But I don't

think the average law abiding fisherman should suffer or be penalized because of others. I kind of get the feeling that some of the proposed changes are based on those fishermen.

54. what can I say, I'm thrilled with the proposal for sunfish. In a perfect world I would have liked to see the statewide sunfish limit reduced even more but expected it to be no lower than 25. The closest lake to me is Canadarago, which is one of the lakes with further restrictions. I am very happy to see that, it's a small lake & gets tremendous pressure. I can think of several lakes that should also be included on that list but realize you can't go overboard with that at the beginning. Like Minnesota & Wisconsin, I'm hoping you'll consider adding other lakes that are in need of same. As far as the new crappie regs go I think the statewide minimum size limit of 10" is good. For further restrictions on specific lakes the 10 fish limit is also a positive. Would have liked to see Black Lake added to that list. It's a large lake but another that gets heavy pressure in the spring & fall. I think you might get considerable resistance to the 12" minimum size requirement. 11" might be a little more acceptable. So, all in all, a great first step by the Department on improving our panfish fishery. I'm sure your going to receive an ample amount of criticism from the "you can't overfish panfish" crowd. It's human nature to hear more from objectors than supporters. But, I'm hoping many people who see the benefits of this proposal will also respond.
55. Just heard about the proposal on sunfish on Goodyear Lake. I've been fishing the lake my whole life. Grew up there and currently live 15 minutes away. Now, at the tender young age of 57, and recently retired, I have more time to fish Goodyear. It's an incredible lake. Often snubbed by fishermen who don't put the time in. I would love to be a part of this! I chase gills and perch all year. First ice, last ice, and kayak the rest of the year. If there is anything I can do to help please let me know! I catch gills regularly from late april through late September. But when they go deep for winter months they get tough to catch. Luckily the perch are gorging on midge larvae and we've been lucky enough to get into them over the last several years. Lots of 9 to 12 inchers if the effort is put in. Please let me know if I can help in any way, and I would love to talk to a biologist or read some info!
56. I'm all for it. Why did you leave perch out. Way too many ice fisherman and board fishermen. Many keep them all just to say they caught their limit. Size limit should be 8-9 inches and limit should be 25. Plenty of fish for a few meals. Please respond back.
57. YES YES YES!!! I agree with the proposed regulations. More conservation is needed. People are abusing our waters. Also market fishing in the North Country needs to stop immediately where they catch hundreds of fish and sell them by the pound. That time has passed there is just too much pressure on our resource to sustain that. Thank you.
58. I support the proposed change in sunfish regulations to 25 fish per day. I would even recommend 15 per day. I support the proposed change in crappie regulations to 10 inches and 25 fish per day. I would even recommend 15 fish per day. As referenced in your discussion, fishing now is greatly effective with today's electronics including depth finders, GPS, video cameras, and panoramic fish finders. There are also lake bottom topographic maps available for many lakes. Research has shown that the panfish population in a lake can be seriously impacted with all of these resources for our use. As a result, the larger fish are removed and eventually smaller breeders remain, reducing the overall size of fish in the population and negatively affecting enjoyable

fishing. I also strongly support the Big Panfish Initiative (BPI). I mainly fish Cazenovia Lake, Oneida Lake, and Lake Ontario, and support the inclusion of Cazenovia Lake in the BPI program. In the last twenty years on Cazenovia Lake I have certainly experienced the negative impact of an overfished panfish population. Large bluegills and sunfish were abundant to catch, but no longer. My fishing excursions are mainly limited to three to four hours, and on a good day on Cazenovia Lake I can catch 100 gills and sunfish, with only a handful considered nice keepers. For me I simply enjoy the experience of fishing and catching, with everything being released anyway.

59. I support restricting the unlimited harvest of these and any fish (unless it is invasive and jeopardizing a native fish population). Please support the fishery and impose reasonable limits so that the fishery is sustainable.
60. Make the commercial sale of angler caught panfish illegal. This, by itself, would likely achieve much of what you wish to accomplish with size and age structures. It would also remove a burr from my saddle that I don't believe that a publicly owned resource should be exploited by a minority which also impairs the opportunity for the majority of fishermen who simply enjoy catching larger fish.
61. I agree that limit of sunfish and a minimum size limit is necessary for sustainable fish population. Crappie size limit (9") on larger lakes and bodies of water is appropriate but the size limit on smaller ponds could be 6" as they overpopulate these ponds...
62. I'm ecstatic to see that the DEC is taking measures to increase regulations on sunfish and crappie. A little about myself. I live in Saratoga Springs and have avidly fished Saratoga lake for the past 20 years. I am a multi-species fisherman and I do occasionally keep fish to eat, but release probably about 95% of what I catch. I will tell you that in the past 5 years, I've noticed a dramatic increase in fishing pressure the lake, especially during the spring crappie spawn. In years past, it was not uncommon to catch 12"-14" crappie, we'd even catch a few 16" ones here and there. However, in the past few years, the average size is now 9"-10". The biggest crappie I've boated was a 14" two years ago and a 12.5" I caught this past spring. Word has definitely gotten out as where the spawning areas are and I watch in anger as guys will park over the few spawning grounds and catch and keep limits 9-10" crappie, having no regard for what they are doing to the future population of crappie. I see this same scenario play out for sunfish at all the public access area on the lake. The state boat launch is by far the worst. On several occasions I've watched guys keep 4" bluegills, undersized bass and even bass out of season. In summary, I'm excited to see that measures are being proposed to get pan fishing at Saratoga lake back closer to what it used to be.
63. I have been a LONG time fisherman at Saratoga Lake and the crappie fishing has been excellent. However, over the past 5 years the numbers and quality of fish have gone down substantially. The lake is being over fished!! I have personally seen guys empty their live wells into coolers in their trucks and then go back out to catch another limit. It has made me sick to my stomach. I think this proposal is a GREAT step to reclaiming the quality fishing that we once experienced. I would also love to see a DEC presence on Saratoga Lake to help deter some of these so called "fishermen". I have seen guys take more than a limit of walleye too. Enforcement is key. I would love to help in any way I can so please reach out to me if you need assistance. I am a high school Biology teacher at Broadalbin-Perth High School. I started a fishing club there for our students and I also teach an aquatic research class. We have a pontoon boat on the Great

Sacandaga Lake and I have my students involved in a walleye tagging program and invasive species monitoring program. Getting our students involved in this kind of research has been invaluable. Thanks for all that you do to conserve our ecosystems and wildlife. It is much appreciated by me, my family, and my students.

64. just throwing my thoughts on the future panfish regulations, I grew up on Seneca fished it all these years chartering and fun fishing, one of the things I've noticed over the years is yes it's nice to catch and keep 50 perch on the finger lakes but I always thought it would be nice to have a 30 fish limit on Seneca or even all the finger lakes. Seems like more and more guys are starting to get into fishing, electronics are getting better. Also one of the things I've been doing the past few years is throwing back perch over 16 inches..they are the biggest breeders of perch with huge numbers of eggs, I feel along with a handful of other guys that their should be a limited amount of perch to be taken above 15 inches either during breeding season or year round.
65. THE PLAN TO CREEL 12" + CRAPPIE IS UNREASONABLE. I RAN A CRAPPIE TOURNEY FOR THE HONEOYE FISH AND GAME CLUB FOR 11 YEARS. WE HAD 12- 15 BOATS, 2-3 ANGLERS PER BOAT . OF ALL THE CRAPPIE CAUGHT ONLY 5-10 CRAPPIE WERE 12"+. MOST OFTEN THE ANGLER WITH THE 12" CRAPPIE WON THE TOURNEY. MOST FISH CAUGHT WERE 9 TO 10" COOKIE CUTTER SIZE. IT WAS RARE THAT ANYONE WOULD HAVE A LIMIT OF 25. I THINK TAKING THE CREEL TO 10" WOULD BE A PROPER APPROACH.
66. I think it is a great plan and long overdue. I have fished Canadarago Lake for many years and have watched a small group of people rape the Sunfish population of this lake. I just hope the enforcement level is as good as the plan.
67. Whos' idea was this? I thought the idea was to show kids how to fish, sunfish,were always the tool.My grandmother always cleaned and cooked them no matter the size. As a lakefront owner my grand kids spend hours on the dock catching sun fish to eat, which i think there are to many,when i by see every bass nest surrounded by them. Why Otisco?Why not Skaneateles or Cazenovia lake ,have not heard of a reason, i think i know. Makes no sense to me, just like antler restriction, people looking to boost their egos with bragging rights for the biggest one, a form of penis envy. Leave the size alone, let kids have fun, who needs 8in sunfish?
68. Please do not make anymore unnecessary regulations. There are too many regulations now. This will only hurt the fishing industry and do nothing to help it. By the chance I get to catch 35 gills one day. I could put a batch in the freezer. Jefferson County has no limit on perch,seems to be plenty of perch there. Don't make another useless regulation. If anything you need to reduce regulations
69. Saratoga Lake proposes for the Bluegills and Crappie are OK but the 12" on the crappie is a little stiff but I can live with it.
Like the idea of a state wide limit of 25 BG's without a size limit. Crappies kept at 25 with a 10" size limit is OK.
Market fishermen from Vermont used to come off the ice at Fitch Road with hundreds of BG's in their sleds as well as pails full to be taken back to Whitehall or into Vermont for selling. This went on for years and the larger sized gills were really thinned out. Finally Econ put a 50 fish limit but they still came back to hammer the panfish. They were very good at their trade. Then the limit dropped to 25 then down to 15. I still fish

panfish thru the ice as well as in open water. I've noticed that in the last 10 years or so the BG size has slowly come back with many of our fish (open water) in 9-10" class. So the 15 fish limit is working, thanks. I try to get up to Saratoga Lake twice a week if possible during open water. At 79 years old I am glad to see Econ is looking to take an interest in "my" panfish.

70. I wanted to voice my opinion on this draft plan for Sunfish and Crappie Fisheries. I approve of these proposed changes and hope they are soon implemented. I feel this plan would be a welcome regulation adjustment for these fisheries. My wife and I have stated for years that we felt that the harvest limit was borderline overharvesting if not overharvesting. Many times on social media were we somewhat sickened by seeing large coolers filled with panfish. We are all for trophy fisheries in New York State; limiting harvest limits and maximizing the size requirements of all species. I understand people keep the fish they catch and are given the right to do so by New York. However, I believe the current limits are unsustainable. I can recount many times when I would go to an old reservoir, lake or pond and after not even seeing a panfish in the shallows say "Well this place has been fished out of even sunnies." I also feel that perch may need to be visited for an adjustment as well.
71. I am in favor of the proposed lower daily limits on the sunfish group. I would add in perch as well. I would like to see more enforcement of the constant overfishing by certain groups. DEC seems reluctant to enforce fish and wildlife regulations violated by certain religious and ethnic groups. This hurts us all.
72. Love the thoughts of changing size limit of crappie on bear lake. Amish have been cleaning the lake out for years
73. I agree with both, size limits and quantity of harvest. May also need some kind of provision for swallowed hook kills? Often times nearly impossible to remove hook when to the stuck in the hills.
74. 25 fish per day is certainly better than 50 but does someone really need to keep that many? How many wind up as fertilizer? I would think 12 would be much than enough. Unless license sales is more importantly.
75. I live on the north end of honeoye lake. I've been fishing honeoye lake for 35 years. I'm an avid panfish fisherman! I'm very pleased to here the new panfish management plan. I couldn't agree anymore. Now is the time to take action on statewide panfish regulations. I believe the state (dec) has done extensive research on this proposal. With COVID-19 changing our lives and allowing more people to spend more time boating and fishing I have seen a huge increase in fishing pressure and recreational boating on all surrounding lakes. The finger lakes are small and have fragile ecosystems. This kind of pressure cannot continue without some form of management plan. I'm happy to see all the interest in fishing but over fishing is a real problem. This plan will allow plentiful fish populations to exist into our children's future and give us hardcore panfish guys have a shot at a real trophy. Technology has changed the way we fish. Fish have been easier to locate and catch. With the electronics we have today fish no longer can hide. When we find them we hit "spotlock", then we throw the newest, most technologically advanced baits to them. We then save our gps location etc etc etc. I love and own all of these awesome technological advancements, but so does most everyone else. This is where technology becomes a problem. Too many fish being caught and kept! Lots of people

love these lakes and respect the fisheries by maintaining personal bag limits. I believe it is time for the people to speak and work with nysdec to maintain outstanding fisheries with management plans that match our current , ever changing times. These are o my two of many arguments I can make to favor this new management plan. Thanks for the opportunity to respond.

76. A great plan for increasing the size and quantity of Sunfish. Better quality fish will help to encourage more young fishermen and fisherwomen to continue in the fishing sport and provide more quality fish for those of us that enjoy a good panfish meal. While it might be too late for this might I suggest an alternate strategy for Sunfish. Make the limit 20 or 25 but require that only X number of them are over or under a certain length. I've been fishing in Lake George (Region 5) for over 65 years and while I'm dissapointed that your plan does not include us I wish you success and hope to see it in our area soon. You might consider Rock Bass as well. I fish the southern basin of Lake George and if there's anything I can do towards this goal let me know.
77. The proposed size and daily take limit Regulations should not on be considered but made state wide laws in all nys lakes the. Fact that people are depleting the source of a dwindling number of fish in lakes throughout New York should be of great concern. As we are in the middle of the ice fishing season large groups of people participating in ice fishing tournaments for profit is using the lakes for pure profit while depleting on New York State tax payer commodity faster than it is being renewed
78. The Onondaga County Federation of Sportsmen's Clubs represents well over 8,000 members in the following Sporting Organizations throughout Central New York:

[Advanced Strategies Adventures](#)
[Angler's Association of Onondaga](#)
[Baldwinsville Rod and Gun Club](#)
[Bridgeport Rod and Gun Club](#)
[Camillus Sportsmen's Club](#)
[CNY Pheasants Forever](#)
[CNY Ruffed Grouse Society](#)
[CNY Wildfowlers](#)
Clay Sportsmen's Club
[DeWitt Fish & Game Club](#)
[Elbridge Rod and Gun Club](#)
Eastern Lake Ontario Salmon and Trout Association
[Fayetteville-Manlius Rod and Gun Club](#)
[Finger Lakes Retriever Club](#)
[Friends of Carpenter's Brook Fish Hatchery](#)
Independent Fir Harvesters of CNY
[Izaak Walton League of Central New York](#)
Lafayette Rod and Gun Club
[Liverpool Rod and Gun Club](#)
[Lake Forest Sportsman Club](#)
[Lock Stock & Barrel Club](#)
[Nedrow Rod and Gun Club](#)
[Orchard Game Club](#)
[Otisco Lake Rod and Gun Club](#)
[Pompey Rod and Gun Club](#)

[RMEF CNY](#)
[Salt City Bassmasters](#)
[Skaneateles Rod and Gun Club](#)
[South Shore Association of Oneida Lake](#)
[Syracuse Pistol Club](#)
[Trout Unlimited Iroquois Chapter](#)
Woodfield Sportsmen

On January 18, 2021, at a meeting of the delegates from representative clubs, the delegates voted to send this letter in support for parts of the DRAFT Sunfish and Crappie Management Plan, and comments on a part of the plan they do not support.

The delegates felt that these items in the plan were of particular interest:

SUPPORT - Objective 1: Statewide Sunfish Management

SUPPORT - Objective 2: Statewide Crappie Management

OPPOSE - Objective 3: Big Panfish Initiative (BPI)

The delegates did not see a need to designate “trophy” sunfish and crappie lakes within the state, creating a patchwork of different regulations for various bodies of water. The group felt that a standard regulation should cover the whole state.

79. Below are my comments concerning the proposed draft Sunfish and Crappie Management Plan, and I trust these recommendations will make it to the final proposal. Since the management plan encompasses Sunfish species and Crappie species, I have elected to break up my comments to specifically focus on each family of panfish. Panfish represent the gateway for young anglers to become “hooked on fishing”. Young and new anglers are not so much concerned with size of catch, but rather volume of catch and excitement of feeling the tug on the line. Sunfish offer the first foray into angling for most who pick of a rod and reel when young, With simple tackle demands and tactics, success of a panfish fishery isn’t measured in inches; it is measured in smiles and participation. Fish creel is typically dictated by the parent teaching their young son or daughter about fishing, and is not driven by the child, who is interested in catching and keeping some with parental permission. During my reading of the draft plan, I found it very curious to see a big omission in the science presented – that sunfish are forage for larger gamefish, such as bass and pike. Many waters across NYS support predatory fish populations through abundant sunfish that are of the right size. Sunfish that get too large cannot be eaten, and this has resulted in many ponds and small lakes seeing stunting in both panfish and gamefish populations. I am rather dismayed by this omission, and have to wonder about the efficacy of the studies themselves. Most angling in NYS is catch and release. This includes panfish, although at a lower rate than some gamefish species, like bass, trout and muskellunge. The likelihood of limit takes was stronger 10 years ago than it is today. Anglers today typically will keep a few for the table, not push on for limit catches every day on the water. Whether the limit is 50 or 25, or some other number plucked from the sky, the reality is very few actually will keep a limit. The species of fish that is most likely to be kept at limit numbers is yellow perch – a species not addressed in this plan, and a species that is prolific in breeding numbers, with vast amounts of eggs laid and fertilized as compared to the sunfish family, which make beds and lay a smaller number of eggs.

Sustainability depends on water size and quality of the habitat. Perhaps a more nuanced approach to the daily limit is warranted. Large bodies of water, such as

Chautauqua Lake, Black Lake, Oneida Lake, and the Finger Lakes, can sustain a 100 fish per day limit. Smaller lakes, such as Allen Lake, or Cassadaga Lakes, and small ponds, where spatial escape is more limited, perhaps warrants a reduced daily creel limit. The blanket change from 50 to 25 does not appear to be rooted in any science, rather appeasement of vocal and rabid catch and release anglers forcing their values upon others. It is in water body size and quality of habitat that abundant panfish will exist. I recommend taking a hard look at this and adjust the management accordingly, if necessary at all. Many of the smaller waters do not see much pressure, and many ponds are private. It would seem to me that education would be a better way to go, less costly and more effective, as educating anglers to how the size of the waters being fished impacts the sustainability of sunfish harvest would provide more success and acceptance. Crappie present a differing set of demands for a good fishery – and is habitat driven, especially when crappie are young and very vulnerable. However, water body size remains the limiting factor in “trophy class crappie” potential. This is the reason why Chautauqua Lake consistently produces crappie exceeding 15 inches in length, whereas smaller lakes show this size as a rarity. The daily creel limit of 25 and the 9” minimum size has helped many prized crappie waters recover from chemical weed control efforts that undercut several year classes of crappie during the 1990’s in pursuit of making boaters happy. The combination of chemical weed control and overfishing simultaneously was what drove the population crash on Chautauqua Lake. We can learn much from this 30 year old event, but I fear those lessons may be lost on new biologists and fisheries managers, as I see once again permits being issued to spray massive weed beds for convenience of boaters. Do we ever learn our lessons? The minimum size of 9” has worked, and no need exists to bring this limit to 10”. Although the idea of a “prime crappie” or “big crappie” water sounds good, the comprehensive habitat management and protection, specifically from chemical weed control, is far more important than punishing anglers for lakes having their crappie nurseries eliminated before the fry can grow and move out of these protected areas. Without the weeds providing food and cover, we have no crappie – as was proved on Chautauqua Lake during the early 1990’s. Once again, perhaps some adjustments could be entertained based on water size, with smaller waters having a higher minimum length or lower daily creel. Larger waters will show no change as spatial escape from angling pressure will be what delivers larger fish, regardless of limit size pulled from Lord knows where. Let us not forget that crappie are also an important forage fish, especially for bass and muskellunge. Improvement in sunfish and crappie fishing will be realized when chemical weed spraying efforts are better tuned to the lifecycles of young fish. Perhaps a statewide policy on chemical treating of weed beds to after July 15 would better serve those ponds and lakes being targeted for effort? Also, with management plans comes monitoring and additional cost and effort, something NYS DEC can ill afford at this time. Over-regulation has been identified as a key culprit in fishing license sales declines, and thereby revenue declines. Confusion and over-regulation has been identified as the key driver to losses of angling participation and license sales, and is the reason why DEC has been streamlining regulations over the past decade. This has not changed. These proposed moves will be counter-productive. I stand opposed to this “plan” as written. Its elements are arbitrary, forage realities are ignored, and no compelling reason or need exists despite the best efforts to characterize otherwise. Please refocus the efforts to areas that will bear fruit – habitat protection and more stringent rules on granting permits to chemically control weeds. Perhaps altering some views on handling “invasive” weeds, like milfoil and hydrilla would also help these panfish as well?

80. As an avid NYS angler who targets panfish among other species, I support all 3 objectives in the draft. In regards to objective 3, I support strategy 2. Just my two cents.
81. In my opinion this plan will do nothing to help to increase the fish population and size of these two panfish species. Why??? Because the DEC needs to more aggressively enforce their existing Rules and Regs....piling on further restrictions means nothing given the current lack of enforcement. If you really want bigger and better Crappie and Sunnies, hire more ECO's and make this fishery enforcement a PRIORITY rather than an afterthought. I am a lifelong diehard Crappie fisherman who witnesses the slaughter of Crappie on Black Lake every Fall. I have contacted ECO's to no avail. They seem to be too busy with hunting and Game Management options. Boat after boat around me takes every fish regardless of size and pays no attention to the quantity limit. New rules sound great but without enforcement they are meaningless.
82. I'm writing from Butterfield Lake in Jefferson County NY, near Redwood NY. I support the proposed legislation and want to offer the following support for these changes. Butterfield Lake has had fishermen pulling buckets of panfish from the lake, day after day. Some have confronted them but they always have returned. The catch here has grown more diminished and smaller in size. Perch have almost disappeared. Even the bass populations are smaller and caught less frequently. We also have early season fishermen putting pressure on the spawning beds doing "catch and release" before the season opens. Conservation officers are seldom seen. Some stronger regulations will at least empower the cottage owners and most fishermen to understand and honor the conservation of our resources. We have a beautiful lake and we welcome visitors here, we just ask that all fishermen respect the resource and behave according to the conservation practices that are needed. Thank you again for pursuing these changes.
83. I have been fishing for over 50 years. I am against your proposed regulations. 12" crappie limit, 95% of crappie aren't that size ever! 8" perch limit of ice fishermen; NO! Blue gill take over small lakes, like Harwood. They MUST be thinned! Where do you guys fish? This will discourage kids, which you have discouraged generations already, From bring home a catch to Mom. Have a heart! And why is on SELECTIVE lakes???? Hurts even more. You'll have LESS people fishing!
84. Has anyone looked at the fishing consumption of the Cameron birds? They eat alot,I've heard of up to 16" walleye being found in their guts. There's too many of them being left unchecked.
85. I have been open water fishing and ice fished Saratoga Lake for the last 30 years and have rarely caught any crappie, much less anything close to 12 inches. I know this species of fish are voracious predators who eat many fish fry. They are successful fish propagators of their species as they spawn so early each season. I do not agree with increasing the size limit to 12 inches and a daily harvest limit of 10 crappie. If anything, you should leave the current size and creel limit the same (9 inches, 25 fish) in order for other breeding species to survive the predation of these crappies.
86. I got a call from a gentleman that did not want to "mess around" electronically to provide feedback on the panfish regulations. He is all for the sunfish 8 inch limit and reduced harvest limit (and he did put 2+2 together that this would eliminate the commercial sale

of them). He is not in favor of increasing the crappie size limit however. He feels that in many smaller waters the fish may never grow large enough to be legal sized.

87. I would like to see the size limits proposed (section 3) in ALL waters not just the few lakes that you have listed in this Feb 15th open comment proposal.

88. I realize that your survey is targeted towards crappie and bluegill regulations. I do support a closer look into the management of this resource. I think minimum length requirements are extremely important to the management of the various panfish species that we have in NY. I also wanted to turn your attention to the management of yellow perch in our Fingerlakes region. I have attached a picture of what is currently going on in our area. This concerns me as these fish are a highly targeted species. I think we need to look in depth at the minimum length requirements as well as the limit that is allowed on a daily basis. Please contact me with any questions you might have.



89. I am an avid fisherman and love catching and eating panfish. I admit that I did not see or participate in the original online panfish survey. I generally fish the Saratoga/Lake George Region (on several lakes and rivers in that region). I must say that I'm surprised at the need to reduce the sunfish limit, in the general Statewide regulations, from 50 to 25 fish and increase the size limit on crappie from 9 to 10 inches. I have found that the numbers of sunfish (both pumpkin seeds and bluegills) and crappie are very abundant in the bodies of water that I have fished over the past year like Lake George, Lake Champlain, Ballston Lake, Cossayuna Lake, and the Fish Crick. I also have not seen excessive numbers of panfish anglers on any of these bodies of water. Were these changes proposed based solely on this survey or were their statewide studies conducted to estimate the number of fish in NYS water bodies? Also, I have fished Saratoga Lake for most of my life. I'm not sure if I've ever caught more than one or two crappie 12 inches or larger on that body of water. The problem with Saratoga Lake is not over fishing. The problem lies with the Lake Association. The annual chemical treatments and constant summer harvesting of weeds from the Lake has devastated the aquatic habitat. Many fish are "ground up" each year by the harvesters. Specifically, the forage fish and fry that rely on the weeds for cover and food. I suggest banning these treatments for a couple of years without introducing new size and creel limits. I believe that the panfish populations would recover nicely.

90. The proposals for sunfish and crappies drafted are what's needed for New York's waters, tailored management for the potential and needs for the body of water is going to be huge and I think will see a net gain on waters that have great potential but often suffer from a bunch of pressure either due to proximity to highly populated areas and tendencies for early ice up. I hope early success leads to more specialized regulations in the near future.

91. As a avid sport angler for over 50 years I have watched the decline of both Sunfish and Crappie in most of the waters in region 9 where I fish. In many waters sunfish are not

just small they are nonexistent. In the past 2 years I have caught 1 Crappie in places that I would encounter them regularly. While I applaud your efforts to improve this fishery I think your plan falls a bit short. No one needs to harvest 25 fish at a time. The minimum length should be 8 inches statewide and 10 in your "big fish" lakes. I understand the need to control populations in some water bodies to prevent stunting from overpopulation but from someone who fishes several times per week those waters are few and far between. Again, I applaud your efforts to maintain our world class fishery in New York.

92. As someone who has fished for about 66 years, starting with catching Pan Fish of all species as a child I would make the following suggestions: 1. Many children learn to fish and start with Pan Fish. Easy to catch and plentiful. My first concern is that those who teach young children to fish may be held to a legal standard that may put them in conflict with DEC Officers. The first fish Children catch are usually smaller than the legal size limit imposed by DEC. Children want to keep fish they catch, usually alive in a bucket to see how they live. Yes, I understand it is horrible that these small fish may not survive and would die. It is important that children learn the consequences of keeping fish out of their habitat. (Note: Most children will return fish after a discussion with an adult, but placing fish in a bucket could cause conflict with DEC Officers.) 2. Pan fish are often caught that are under size and swallow the hook. Because of their size it is often difficult to remove hooks without causing harm. Newer style hooks, (such as Circle Hooks) can help with safely removing hooks but it is still difficult to avoid harm and young children don't understand how easy removing a hook will cause harm to the fish. 3. As a child I don't remember keeping large numbers of pan fish. Two or three maybe as many as five. A creel limit on these fish is probably not an issue for young anglers. 4. I have enjoyed catching Pan Fish While Ice Fishing. As these fish are small overall, good size fish usually about 1 pound, after cleaning and fileting, there is a small amount of edible fish. Pan Fish are very good eating fish, and I highly recommend them. Catching large numbers is necessary as you need a number to make a meal. I own a pond and most fish are caught and released. (Pond is about one acre in size) About one pound is the largest most fish reach in size when left to grow. My discussion is about Sunfish, Bluegill Sunfish and Pumpkinseed Sunfish. Crappie will grow a little larger. As catching larger fish would be nice I believe these smaller fish serve a bigger purpose, to entice younger anglers to learn to fish. Increasing limit size could make it difficult for the under age anglers. The larger size limit would make more fish illegal to keep, potentially causing conflicts with DEC Officers and young anglers. I've listed some reasons for what I feel as a NY Angler and the Regulations for Sunfish and Bluegills. First, regulations too restrictive will put young people in conflict with DEC Officers. (People aged 3 to 16 years of age) We need the young to feel comfortable while fishing, not worrying about getting into trouble. Second as someone who likes Ice fishing for Pan Fish and the reward of a nice fish meal I know that you need a number of these fish for a family meal, even large pan fish. I would like to see a limit number in the area of 30 or 35. I have not found it difficult to find nice size Pan fish. As for crappie regulations I feel the size limit 10 inches is too restrictive. Sunfish, Crappies, & Yellow Perch are feeder fish, making them always in demand to bigger fish species. This in itself can be the cause of smaller fish sizes. We have seen a resurgence in the number of and size of game fish in the lakes of New York. This is because of cleaner water, improved habitat and restrictions on size and creel limits. We have seen an increase of slot limits to allow specific size fish being legal to keep. I apologize for this message being in two sections as I am having some difficulty with my computer. You are all doing a good job at DEC and I hope you will

consider what I have to say. I hope this information is of some help and I hope you will consider the New Anglers, (Young Children).

93. I am submitting these comments in support of the sunfish/crappie management plans.
1. Fifty sunfish a day is too high; it is ridiculous. I think 25 sunfish a day is too high, too. 2. Many anglers don't seem to know that there is a size limit on crappies! If the size limit were enforced, or advertised, that would help. For instance, put a kiosk or sign up at boat launch sites. I think 9 inches is a decent crappie, but I support 10 inches if it helps reproduction. Thank you for cranking down on the limits!
94. I agree with the proposals in the draft Sunfish and Crappie management plan, especially the following: Reducing the sunfish statewide daily harvest limit from 50 to 25 fish; Increasing the crappie statewide minimum size limit from 9 to 10 inches.
95. As an avid freshwater fisherman on Long Island I've seen a huge drop off in the pan fish numbers in the past few years. I think reducing the bag limit to 25 is not nearly stringent enough. Actually, I would make it catch and release only until the populations rebounds. Once again, fishing in some of the ponds and lakes is actually quite poor compared to recent past. Thank You.
96. I think the regulations proposed for the limit of fish should be made state wide rather than to specific lakes and waterbodies. I also think the size of crappie to keep should be 13". Too many small fish being caught and kept in the winter. The quality of fish you can get on some lakes is not there anymore. Too much fishing pressure is what I think. I also think that the daily limit for perch should be reduced to 25 as well. With the popularity of ice fishing the weedbeds and areas where panfish congregate are getting overfished. The size of perch on Schroon, Lake George, Mayfield Lake, West Lake for example, have diminished in the past 10 years. There may be other factors that contribute to it, but guys are catching 50 perch a day ... a lot, and they are 9-10". There are no more bigger fish over 12" that are worth keeping and filleting. ... it's taking its toll on the quality and number of fish.
97. The proposed new panfish regulations are a good start, however I do not feel they go far enough. I feel that yellow perch should also be included with a minimum length of 8 inches and a daily limit of fifteen. I fish the reservoirs of Madison county regularly and maintain a cottage on Tuscarora lake. Over the last five years I have noticed a very sharp decline in the number of perch, sunfish and crappies caught on this lake and sonar scans on the lake no longer show the large schools of these fish that were always present here. Conversations with other fishermen and lake residents echo the same observations. People who live on the lake no longer observe the schools of panfish near their docks nor see the large numbers of fish when snorkeling near the shoreline weed beds. Many of these people also comment on the almost daily fishing pressure by the local Amish population who they say never release a fish. All fish caught go into the 5 gallon pails regardless of size. These fishermen and residents also comment on how they never see a conservation officer on the lake checking for compliance to the fishing regulations. I myself have owned a cottage on the lake since 1979 and fished many hundreds of hours here without seeing a conservation officer on the lake or shoreline. Since the walleye fingerlings stocked by the lake association feed on the small yellow perch, and the growing population of large chain pickerel also prey on the yellow perch it seems only logical to protect the population from excess human harvest by implementing more restrictive size and daily catch limits. Even though there is no public

boat launch on the lake access through other areas is providing the opportunity to a growing number of fishermen in canoes and kayaks. I have spoken to many of these new fishermen and women who enjoy the opportunity to fish a clean mountain top reservoir, often with their children and they support more restrictive harvests of the panfish especially the crappie and yellow perch to protect the lake's populations.

98. I fish in Jefferson county for big crappie in February. The last two years there have been anglers from down state who come for the crappie take. Eight guys with limits four days in a row. Who knows what they do with so many fish but it seems excessive to say the least. I'd like to see the daily limit reduced from 25 to fifteen. I like the other proposals and would like to see them implemented. Thank you,
99. I just wanted to voice my support for the drafted panfish plan overall, but the Otisco changes in particular. As a regular fishermen of Otisco lake, I believe that these changes will be great for the fishery at Otisco and turn in into a great big bluegill/ crappie lake.
100. I was happy to see the state moving forward with plans to manage both sunfish and crappie in NYS lakes. I live on Honeoye Lake and have spent summers here all of my 68 years. I have noticed my own catch rate, especially sunfish (perch have actually seemed to take over), has dropped. Catching decent size sunfish was never a problem and most of the ones I do get are still pretty nice - in the 10" to 12" range. But the catch rate has slowed significantly in the past 10 years, especially later in the summer and even into fall. I know some people rely on fishing to put a healthy meal on the table but I also think there is a limit to what the lake can sustain. I'm always happy to see other folks out fishing but I think we owe it to each other as well as to the health of the lake in general to limit the number and size of the ones taken. I am also in favor of the approach taken with monitoring several lakes (including Honeoye) to see the impact of these regulations. I hope this type of work continues and includes perch and other targeted species. Good luck with this management program. I look forward to hearing more on the results.
101. It occurred to me that I do not know a single angler who targets the ubiquitous chain pickerel. Perhaps your plan should address this species and the havoc they wreak on other game fish, like sunfish, too?
102. I am in total favor of your plan. Too many gills being taken. How about a size limit also.
103. Please accept my comments on the draft plan: 1. I would support smaller bag limits and larger size requirements for Blydenburgh Lake. 2. I believe regular enforcement of the limitations is paramount to the success and intended outcome of the change in regulations. 3. Since 2017, I have perceived a smaller population of larger fish of all species. Panfish population is smaller in size.
104. In addition to my earlier email, I would like to add my support for expanding the regulated bodies to all or most bodies on Long Island.
105. I think the 8in minimum on sunfish and raising from 9in to 10in on crappie, lowering the limit on sunfish and crappie are great ideas. But raising the limit to 12 inches on crappie I think is a little to high I think you could get away with 11in but 10in seems like a good number. On the other hand lowering the limit to 10 fish I think is a

good idea. I would like to see a statewide limit moved from 25 to 15 for crappie statewide. I've also talked about this roughly 10 of my fishing buddies, they all seemed to think the 12in minimum on crappie in those select lakes was a little high.

106. I'm a concerned angler that has never really gotten used to the idea of raising sizes on fish in lakes that have over population by multiple species of undersize fish. Now I understand that maybe some lakes and fish species do need tighter regs on them. For example I don't fish or haven't fished I should say majority of the lakes on the initiative but when I go to Honeoye I can catch 6-7" with barely any 8" crappie and rarely do I get a keeper at 9". There are in my opinion too many to allow a good size yield for the size body of water. Same lake the sunfish are long but very thin from my eyes so yea I've found more 8-9" sunnies than crappie in the lake. The regs and the people that actually follow them are the people that don't hurt fisheries it's the people that don't get a ticket and the fact that it takes multiple people to call in something to even get it checked out is the problem. Another lake requiring some changes is Oneida when we you gonna raise number of walleye. Over a million adult walleye in the lake and that was before last ice season I believe. That's a very small lake for a million adult eyes. This year will be 1.2 or so I figure give or take. Open that lake up. 6 limit and slot size of 14-17 with 1 being over 18 or something. Another thing is the perch limit and size on Ontario a minimum size should be opened and the limit there should go to min 100 there are so many perch in that giant lake. And perch in other bodies of water need to be sized I wouldn't call a 8 or 8 1/2" perch hard to find and feel that would be a comfortable size. I know that I went into more than just pan fish but I've been meaning to write something for while now. So I saw the thing on ice shanty and felt it a good time to address it. Feel free to email me back if you have any questions of me. Or anything. Thanks for reading my rant on the fishing in New York. O yea. Is there a way we can maybe get better marking for shore fishing access locations And make sure these access points are accessible during ice season where it can be on ice access
107. I think it's a good idea to reduce limits. I think crappie should be reduced to 15 a day the size increase to 10" is a good idea. I see many people taking too many panfish all the time in Sullivan and Ulster counties. Hopefully this passes and fishing improves statewide
108. I have just read your proposal and although it is a step in the right direction, too much, too fast will put a bad taste in one's mouth and create a lot of hard feelings, less interest and possibly more violators than ever. As I mainly fish the western Finger Lakes, Honeoye mainly, then Hemlock and Canadice, an increase to 12 inches on Crappie in Honeoye is going way overboard. 10 inches, yes, a good start. Split the difference in daily limit. 15 would be fine. As for Sunfish/Bluegill in Honeoye, why not start at 6 or 7 inches and 25 daily limit. Re-Evaluate after a year and see how it is doing and get angler input. Another thought on 2 lakes, Hemlock and Canadice, the boat launch areas are terrible. Why not install decent launches, and CHARGE A YEARLY FEE, for Boaters and Kayakers! This fee would offset some cost and assist in upkeep. You can not launch a boat at the south end of Hemlock during the summer months into the Fall. Thank you for your time.
109. I would be in favor of these changes. I would only add that Silver Lake should be added to include the increase size limit and decrease harvest limit for crappies as well. I

have fished there for the past few years and have experienced catching a lot of crappies in the 4 to 7 inch range with not many keepers to speak of.

110. DRAFT NEW YORK SUNFISH AND CRAPPIE MANAGEMENT PLAN The New York state conservation Council (NYSCC) fish committee recently reviewed the proposed New York sunfish and crappie management plan, their comments are as follows: The committee applauds the NYSDEC for proposing this much needed plan. In many lakes and streams in NY the populations of these popular panfish species has been decimated by heavy fishing pressure. I have personally seen on Honeoye Lake what heavy fishing pressure can do to a once great "bull sunfish" population. The old panfish techniques of long bamboo poles and bobbers has been replaced by highly sensitive fish finders, ultra light poles and lines along with new plastic lures etc. The average fisherman's daily catch has risen dramatically and I believe more fishermen are targeting these tasty fish. The NYSCC fisheries committee unanimously agreed on the proposed sunfish daily creel limit reduction from 50 to 25. They also support the crappie minimum size limit from 9 to 10 inches but one of the members thought this might be a little high for many waters in NY. The committee also supports the Big Panfish initiative and harvest reduction for limited proposed waterways. As stated earlier the NYSCC fisheries committee supports this much needed plan. It will be interesting to see the results of the Big Panfish initiative and it can be tweaked if necessary.
111. I wish to inform you that I concur with the proposed regulation changes. It has been a long time coming. In today's world, greed has become the norm...well actually has been the norm for quite awhile. During my many excursions on various lakes, I have witnessed (and reported) many violations to limits of panfish. The proposed changes for Delta Lake (12 inch size limit, 10 per day quota) would be a wonderful addition to the regulations. I'm 75, used to head to Black Lake often to fish for those delicious pisces fillets. I am no longer able to continue those treks. With the recent (relatively speaking) appearance of Black Crappie in Delta Lake, I'm now again able to enjoy harvesting those fabulous fish. The changes proposed will ensure a more viable population while at the same time allow for the opportunity to catch some really decent, perhaps "trophy", size individuals. Hope they pass.
112. Believe reducing the daily sunfish limit from 50 down to 25 fish is acceptable. However, creating a minimum length limit of 8 inches for sunfish with a 15 fish creel limit on select waters seems a bit extreme, given that most anglers consider sunfish as an introductory fish for our NY State youth. From my conversations with anglers they feel merely reducing the daily creel limit will create additional fish in the system thereby increasing the potential spawning pooles, while also allowing harvest of smaller fish if the angler desires. If we restrict the harvest of these smaller fish, then we create more feeding pressure on the same forage base which will likely end up stunting the sunfish growth rate, much like the failed experiment of the 15" minimum length limit for black bass on Black Lake. Once implemented in 1995 all that black bass MSL did was create more fish feeding on the same available forage base; end result we now have a bunch of 12 - 14.75" black bass in the lake but fewer 4-7 lb class bass than we had before the MSL was implemented. I merely bring this up as these MSL regulations don't seem to work too well for warm water species in our cooler Northern waters. Especially so since our growing season is already much slower than more southern waters where MSL have proven effective. Believe our best management course of action is to keep it simple by implementing a "statewide change" reducing the sunfish creel limit to 25 fish per day and increasing the crappie MSL to 10"

113. Regarding changes in Sunfish regulations, please consider allowing the use of sunfish as bait. General regulations allow using any fish in their open season and size as bait-fish. My friend and I sometimes use small sunfish as bait. We catch them using small hooks and pieces of worm. A 2-4 inch sunfish works reasonably well for catching bass, and 4-5 inch sunfish works well for larger catfish late spring/early summer. Could you please include a provision to keep a small number, for example up to 5 of sunfish of any size for bait - on any lakes where bait-fish use is permitted? It would also make sense to include lakes that prohibit the use of bait-fish in the large sunfish program. Another use for sunfish was several years ago when my niece bragged in school that she caught about 50 fish (which we released) - her science teacher asked to bring them in so that they can do a dissection... personally I wasn't thrilled by it, but we got them some 20-30 sunfish next week.
114. I fish Saratoga Lake for crappie and hope to keep it a great resource. However, I think using a 12 inch size is too restrictive and hurts the current enjoyment of fishing there. I am in my sixties and enjoy keeping several for my table, and 12 inch fish are pretty rare. Perhaps 10 inches and a smaller number limit would solve the issue while keeping the chance for fun and success high.
115. I just wanted to voice my opinion on the proposed panfish regulation change. You are playing God again and Do Not Have A Good Track Record. Leave the regulation alone and stop playing into special interest groups. The DEC was founded by sportsman for sportsman and funded by sportsman. We are the voice.
116. Thank you for the opportunity to comment. Our lake is well known for quality fishing and the proposed regulations will help to control overfishing. We have seen abuses of the current regulations and with this enhancement hopefully limits will be enforced. The lake has an NYSDEC boat launch and we suggest posting of panfish regulations for guest boaters and fishermen to observe. Please keep us posted as to the acceptance of the proposal. Letter attached below: **“DEC proposes new size and daily take fishing regulations for sunfish and crappie “ Butterfield Lake Cottage Owners Association, Comments** Thank you for the recent notification via email concerning the proposed fishing regulations. As the president of the Butterfield Lake Cottage Owners Association, after review, we whole heartedly support the new regulations. An email to the Lake Association Board Members as seen below provides the basis for our responses: “I think we should comment on the proposed regulations regarding NYSDEC pan fish limits. Many of us have seen the two person boat each with two fishing rods filling coolers and buckets (5 gallon) full of pan fish. No catch and release! Noted! This practice reduces the resource, removing the number of larger ones that will spawn. Our guests to the lake abuse the ease of catch. We have noticed a reduction in fish size and quantities and believe the proposed regulation would aid in a more sustainable stock of fish. **Lake Overview:** Butterfield Lake is a shallow eutrophic lake with ample wetlands and shallow weedy bays ideal for fish populations. Outside the wetlands rocky shorelines are noted for ideal spawning sites leading to ample reproduction of all fish species. As noted below, the lake Association board of directors commented on the proposed regulations. Responses were very positive regarding the proposed new regulations and examples were shared regarding past abuses on excessive catches. These examples show it is clear that regulations would provide enforcement regarding unrestricted number and size catches. Our board members are life-long property owners that have seen first-hand examples of coolers and buckets full of fish. **Review of**

Current Regulations: The review process of the proposed regulations included a thorough understanding of the current regulations. Comments were reviewed regarding the State wide regulations, special Jefferson County regulations and the Lake Ontario Saint Lawrence special regulations. Butterfield Lake regulated with respect to the state wide and Jefferson County regulations. Butterfield Lake is not a tributary to the Saint Lawrence River regulations. **Lake Association Board Member Comments:** "I support the idea of commenting on the proposed regulations" (Lori P.). "I absolutely support any legislation that will somehow help to limit the kind of activity you have described. I have watched that kind of fishing go on day in and day out from early spring to late fall. It is surprising there are any fish at all left in the lake" (Shirley C.). "I'm glad to see this is being looked at. I can't think of a reason anyone would need 50+ pan fish in a single day" (Joel H.). "I would also mention that enforcement is a problem" (Steve W. fishing derby judge). "Joe we are all for this. Seem to remember that some of the cooler fish were passed off as perch in the Bay.....However, we have watched boats off Sweet's Pt. sit all day with coolers.....and we feel strongly that those considerations should become law. Limit the number and require a certain size. Also they should add some more game wardens to patrol" (Marge H.). "I'm in, anything to help keep the ecology from continuing to degrade due to human pressure" (Walt D.). "I never appreciated the folks that just sit and take so much out of the lake" (Jim B.). "I also support the proposed DEC pan fish regulation changesover the years we've seen our catches diminish significantly in number because we don't keep little ones..... I have had chats about this, and we're convinced that it's getting more difficult every year to catch enough good-sized pan fish for a meal. Even if regulations are changed, conditions on Butterfield will likely not change much unless catches are checked more frequently - those who are coming in to fill big buckets will likely continue to do so unless DEC cracks down on offenders" (Nadine G.). "We agree completely with Nadine's email. The same has been happening to us and we too see fisherman fill ice coolers with small fish. We've watched them haul the coolers out of their boats at the town dock, multiple times during the week. We were told that they sell the ground up fish to a company for pet food. Steve also agrees that more of a DEC presence is going to be required because he has only been checked once in all our years there" (Steve and Kay B., concerned resident). Thanks for making us aware of this. I support the proposed new limitation.... I'll be submitting a letter to DEC as well. (Scott C., concerned resident). As the lake president and observing yearly fishing, I have noticed many boats (12) in the shallow bays for at least 8 hours. I do not believe the current 50 daily catch is observed" (Joe P. lake president). A major concern is that soon after ice out; fishermen arrive for pan fish, especially crappie. Many times, and frequently, it has been observed boats with multiple occupants each with two poles hauling fish repetitively. Average catch times is within seconds and not exceeding one minute. We believe the violation of catch limits may be for commercial ventures and not merely recreational. Regulations and enforcement is required! **Seasonal Conditions:** At springtime the fish are warming in shallow bays and may be seen in large surface pods. They are quite easy to catch with a jig or worms with floater. Fishermen are currently in violation exceeding 50 fish catch limit regulations. In the summer a few fisherman are noted filling coolers and pails with pan fish. Although more challenging than springtime we see several boats in violation of the 50 fish take. NYSDEC game wardens have been called in the past, with a response that they will not target fisherman and accuse violations. These calls generally have been made in response to early bass fishing prior to the third Saturday of June, date of open season. Jefferson County does not have early catch and release for bass and fishing takes place in violation. Specifically officers reported they will not or cannot discriminate fishing intent. Noted every year and prior to open bass season bass boats with bass lures are seen sight

fishing spawning bass. With reduced pan fish takes this may discourage early bass season violations. It is our belief that sight fishing for pan fish will and does interfere with the bass spawning success. With this regulation bass will be additionally be protected from excessive early pan fishing. **Summation:** Butterfield Lake membership agrees and supports the sunfish, bluegill, pumpkinseed, and all panfish species daily limit reduction to 25. Please clarify if take is 25 total (all sunfish species) or 25 of each sub-species? Agree to require crappie minimize size increase from 9 inch to 10 inch requirement. We reviewed the "Big Pan fish Initiative"; "Implementing a 12-inch minimum size limit and a daily harvest limit of 10 for crappie". From a review of our lake fisherman rarely is a crappie caught in the 12 inch or greater size. We agree a small study would be needed to identify the benefits. **Additional Request:** Please consider education and enforcement methods regarding catch limits within the proposed regulations? Regulation change notices with license purchases. On line notices. Posting at NYSDEC boat launches. Violation warnings for offenders and fine potentials. Violation fines. Thanks you for the opportunity to comment on the proposed regulations! As a committed lake association we are encouraged with the proposal and support sport fishing on Butterfield Lake, for all.

117. That's sounds like a good plan ,would like t see that happen in all NY.lakes and bays.
118. I'm an avid fisherman that has seen the effects of overpopulation first hand. Over population leads to a low oxygen level which leads to microorganisms be depleted. In previous years predator fish have been introduced to maintain a healthy population. A size limit on sunfish, in my opinion, is absurd! Little ones need to be removed as well to sustain the population. There should be no limit on size or number of sunfish harvested. Crappie on the other hand should remain the same at 9" and 15 total. More focus should be directed on the asian carp invasion. If they enter our water system they will be ruined as the Mississippi was! A vast majority of anglers are responsible. I myself let large females of any species go, astley are the breeders. I will not keep the small ones either I will keep them in a certain slot that I deem to be responsibly conserving the population and feature fishing! If anything dont change them at all as I believe this could be devastating!
119. Dear sirs,I have been fishing Honeoye lake for over 30 years.I really love to fly fish for the Blue gill and sunfish.They really are the largest and most fun fish to catch with a fly rod.I agree with the States proposal,to limit the amount of fish that should be allowed daily.I rarely keep the fish,but if I do;i take around 8 for a dinner.I have seen an abuse by anglers taking way over their limit.They come every day and load up their coolers with big bluegill and sunfish.I had one guy tell me,he caught over 3,000 crappie a season.I hope that the State does limit the amount of fish and limits the size too.I am all for the proposal.
120. FLCC Sunfish & Crappie CommentsThe Finger Lakes Conservation Council (FLCC) is pleased to see the NYS Department of Environmental Conservation's (NYSDEC) draft of the Sunfish and Crappie Management Plan. As angler techniques have improved, along with improved tackle and modern electronics, there has been added stress on panfish numbers. Panfish overharvesting, especially at critical spawning time, plus their willingness to bite has harmed panfish populations on many of New York's prime panfish waterbodies. The belief that panfish cannot be fished out has gone the way of many old fishing falsities. It is encouraging that angler surveys showed

positive thinking for more conservative panfish daily bag limits. Therefore, the FLCC, representing organized sportsmen for Region 8, supports the 25 sunfish daily harvest limit for NYS waters. Crappies have become a premier panfish countrywide over the last 20 years. New York has some very good crappie waters. In most cases, the 10" crappie regulation will have an overall positive impact on crappie size and numbers. No doubt, there will be some negative input from some anglers. With the plan to survey angler satisfaction and fish populations, the FLCC supports the 10" statewide crappie regulation change. The plan for a big panfish destination lake in each region is a very good proposal. By reducing possession limits and increasing length requirements, more panfish anglers should have the opportunity to catch large panfish. With a designated big panfish lake in each region, it affords a closer trip for this experience. The FLCC strongly supports Action A – 8" length and 15 in possession for sunfish and Action B – 12" length and 10 in possession for crappie.

121. My concern would be that increasing the size limit and reducing the daily limit would significantly increase the pressure on the forage base in most bodies of water by leaving many more fish in them that much longer and also increase the number of spawning age fish. Another issue is a 10 inch size limit on black crappie as they don't seem to get as big as white crappie and aren't as prolific in my experience, this may make it tough to catch enough to get a family dinner amount. I would very much like to see the data that DEC is using to draw these conclusions as it seems that for the last several years decisions have been made to fish and wildlife regulations more to accommodate trophy "sportsman" than than the people that hunt and fish for entertainment and food. Perhaps spending more time and funding on access to nys waters for all New York sportsmen would make more sense.

122. I, for one am for much in favor of increasing the size limit on crappie throughout nys. I live within 4 miles of Clear Lake WMA and have seen bucket loads of 9 " crappie leave this little lake via public fishing. Please make that and the other changes happen tomorrow.

123. Please do place any additional regulations on fishing. If anything reduce them. You already have hundreds of pages of regulations that makes it nearly impossible not to commit some type of offence. There are plenty of panfish to go around. Leave the regulations alone, I don't want a trophy panfish, just an occasional meal.

124. I'm responding to the article on the front page of 2/5/2021 New York Outdoor News, "**SUNFISH and CRAPPIE changes proposed**". Being a panfish fisherman, I believe that the propose changes are being made without thinking about the impact that they will cause, mainly on young people. I cannot believe changing both the size and daily limit at the same time has been thought out, of what impact they will cause. The electronics we have now days can cause a bay, lake etc. to be fished out, I believe they are the real problem. It's going to be bad enough to tell a small kid fishing for the fish time, that the sunfish, that they just caught from the dock has to be 'X' number of inches in order to keep it.

1. Sunfish, why not change just the " SIZE " from " ANY SIZE " **STATEWIDE** " to (9") and leave the daily limit at current 50.
2. Crappie, why not change just the " SIZE " from (9") **STATEWIDE** to (10") and leave the daily limit at current 25. **Enforce what we have now, before making changes that won't be enforced.**

125. I agree 100% with what you are trying to accomplish by raising the limits and size of bluegill, panfish and crappie to be harvested in NYS waters. I have a place on Honeoye and my grand kids love catching them. I have set up ice fishing rods for them with small trout flies (nymphs, caddis) and a bobber. They have a blast. I have taught them catch & release for almost 99% of their fishing trips. A lot of people fill up their coolers, maybe eat a few and for the most part the rest go for bragging rights and then under the flower beds or just tossed out. Great plan!!! Release them to get bigger and to be caught another day.....

126. With regards to the new proposed panfish regulations I submit the following : I'm in favor of having a 25 fish limit for sunfish. I'm in favor of increasing the state size limit to 10" on crappie with a 25 fish limit. I'm NOT in favor of increasing the size limit to 12" on Honeoye and Silver lakes. I don't know about the other lakes mentioned in the proposal but I fish Honeoye and Silver lakes quite a bit for crappie and it's very hard to get even 10" crappie and 12" ones are extremely rare ! I've never caught a 12" crappie on Silver Lake and it's been a few years since getting one on Honeoye. A 10" size on both these lakes should be enough!

127. I am a licensed NYS angler and have been made aware of the "Draft New York Sunfish and Crappie Management Plan" via a recent newspaper article. I was not aware of or invited to participate in "the internet survey" last August. I am pleased to see Pro-activity in preserving the panfish and crappie population; it is important to me as well. As are all fisheries . Setting aside for now any personal opinions regarding the proposed Draft; I would urge you to consider the following questionsto determine if proper due diligence was performed prior to determining a need and bringing this "Draft New York Sunfish and Crappie Management Plan" to the general NYS population of sportsmen. A response is not requested, as I understand this is a one way feedback dropbox. The proposal states it is founded at least partially using an email survey response of 1140 Boaters/Anglers. Some questions regarding the validity of that premise:

1. Of the 940,000 NYS anglers who purchased a license in 2020, is responses from 1,140 individuals a suitable sample size to justify/propose regulation changes?
2. Of the 1,140 responses, are all age groups represented in correct proportion to the population of licensees?
3. Of the 1,140 responses, are all races/minorities represented in correct proportion to the population of licensees?
4. Of the 1,140 responses, are all income ranges represented in correct proportion to the population of licensees?

5. Of the 1,140 responses, are all DEC “regions” represented in correct proportion to the population of licensees?
6. Of the 1,140 responses, was it verified all 1,140 purchase a NYS fishing license in 2020?
7. Is it not important that any survey has input from a representative cross section of “Fisherpersons” ?

Some general question regarding the response sampling method:

1. Why was the sampling limited to those subscribing to an online DEC Delivers Fishing and Boating? Does this discriminate to a portion of the NYS Angler population?
2. Why weren't all 940,000 anglers invited to participate in the survey before the Draft was created? E.G. A postcard to complete issued with their 2020 Fishing license? Is there a better way going forward ?
3. Why was the online survey response window limited to 14 days?
4. The survey and report addressed “panfish”. There is no mention of “crappies”, which currently have a NY minimum size limit. How did the “panfish” responses culminate in Draft “crappie regulation” changes?

Some question regarding the “Draft”:

1. In reading the Draft : Of the more than 1,400 respondents, 77% thought that an appropriate daily limit for sunfish should be 30 or less, and 57% favored 20 or less? Is that statement correct? 77% + 57% = 134%
2. The Literature chosen and referenced in the Draft is from northern midwest states Wisconsin, Nebraska and Minnesota. Are these studies applicable to NY fisheries?
3. FYI Minnesota currently in 2021 has no size limits on Crappies or Panfish.
4. FYI Nebraska currently in 2021 has no statewide size limits on Crappies or Panfish. (Only a Crappie size limit 10” in three select waters)

5. How was the NYS proposed Crappie size limit of 10" derived? Net samplings? Copycat other states? Why is 10" "better" than the current 9"? What data is used to define "better"?
6. Has DEC performed at least 3 sample nettings in each of the proposed "Trophy Lakes" within the last 12 months, to benchmark the populations that exist today? Are any of those lakes already a "Trophy lake"?

Questions regarding evaluation of results of regulation changes:

1. What written criteria that will be used to annually evaluate if the proposed regulation changes are a success?
2. What is "success? What is "failure"? Where is this published?
3. Will the targeted "Trophy lakes" be statistically net sampled at least 3 times per annum, same GPS location, same dates? To assure some type of a control group of data collection?
4. How will DEC better determine panfish angler satisfaction be measured annually going forward? How can we improve?
5. How will this all be shared with the 940,000 fishing licensees annually ?

Thanks for the opportunity for Feedback!

128. Lowering the limits on quantity is ok with me. Market fishing happens more than most fisherman would believe. I fish Black lake twice a year for my crappie. Its hard to catch 10 to 12 inch fish. I'm good with 9.
129. I believe no fish management plan is complete without a strategy for dealing with the growing cormorant problem. I know the quick excuse from DEC fish managers is that it's up to the federal government and to contact my US Senators if I don't like it. However, the over population problem has been growing since egg oiling has stopped. It's time the DEC went on the offensive and filed a law suit against the US Fish and Wildlife agency, if necessary, to combat the problem.
130. I thought the dec wanted to get more people interested in fishing and hunting not turn them off. With this change you sure will, I know it has me, fishing for 9 inch crappies is tough enough.

131. I have been an active sportsman for over 25 yrs. I love to hunt and fish. I believe your proposed regulations change is spot on. Creating a different class of fish will not only be more enjoyable for the angler, but also for the lakes ecosystem.
132. This management plan is long overdue! I have long been in favor of reducing the sunfish statewide harvest limit from 50 to 25 fish. I also think it is reasonable to increase the crappie statewide minimum size limit from 9 to 10 inches. I would also favor reducing the statewide harvest limit of crappie from 25 to 15. With respect to the Big Panfish Initiative: I direct my remarks only to Honeoye Lake (region 8) and Silver Lake (region 9) because those are the only lakes I am familiar with that are on your list. For those lakes I favor an 8 inch minimum size limit and a daily harvest limit of 15 for sunfish. I do think a 12-inch minimum size limit for crappie in Honeoye Lake might be a bit optimistic. I can't imagine ever catching 10 crappie in one outing measuring 12 inches! These latter comments are made with the admission of ignorance regarding how large a crappie might grow in a lake of the latitude of Honeoye; of course, in Florida, a 12 inch crappie is an everyday occurrence. I know this is not part of the comment period, but I favor establishing a 14 inch minimum size limit for black bass, both largemouth and smallmouth. Michigan has this size limit and no one's complaining! (Also, I'm sure you are aware of Minnesotas's program establishing lakes that grow large sunfish. Sixty lakes are already in the program with more to be added.)
133. I am not familiar at all with the list of lakes included in your proposal to change limits other than Honeoye Lake and Silver. I live in Lockport NY, I will drive to Honeoye lake (170 miles round trip) to ice fish and pan fish after ice out for a pan fish meal. I only keep 15 of my largest combination of blue gill, sunfish, pumpkinseed and if I'm lucky crappie for my meal. I admit I'm not very good at it. Out of maybe 3 trips for ice fishing each season and 4 trips for early spring seldom do I get a crappie. I am not comfortable eating the fish from Silver Lake due to large farms surrounding it. I understand your goal in making these lakes a destination fishery and protecting their sustainability. I agree with daily limit change from 50 to 25 and 8 inch size for sunfish and crappie state size limit to 10 inches. My concern is Honeoye Lake. Crappie daily limit of 10 at 12 inch minimum. Not sure I will want to make the investment in travel expenses knowing I will likely not be bring any crappie home for diner. I always target crappie on my outings. I find them just not the right size. Would this cause higher harvest of other panfish species? With less crappie being harvested what will they eat as they get to 12 inches. Crappie that I've kept fall into the 10-11 inch. I release the 9 inch and don't recall catching any 12 " or over. All in all I think this will help down the road.
134. Where I fish it's hard to get 9" crappie, I would much rather go to a 15 daily harvest limit than a 10" minimum size limit.
135. Crappie size increase would eliminate any hope of fishing for them here in central New York. Many semi-remote ponds are off limits now due to stunting not overfishing. Catch and release is fine but it is nice to be able to keep a few.
136. I am a 76 yr old fisherman who has fished Saratoga Lake for more than 50 years. I am retired and fish in excess of 90 days per year. Of that total, 15 -20 days are spent on Saratoga lake, the balance on Lake Champlain [I own a camp there]. I go fishing for two reasons: I love to be on the lake fishing, and I intend to bring home fish for dinner.

My primary focus is on pan fish. I view perch, bluegills and crappie as equal table fare. Since I fillet my catch, I keep perch crappie and bluegills in that order because of ease of cleaning. On Saratoga Lake, my primary catch is a combination of crappies and a bluegills. I have no problem with a 15 limit and an 8" length for sunfish and bluegills as I do not want to clean fish smaller than that. My views on crappies is much different. Having fished Saratoga for more than 50 yrs, I have lived through regulations that allowed any size any quantity for crappie up to the current day regulation of 25 fish at over 9" length. During that extensive time frame, I have not noticed an increase or decrease in the size or numbers of crappie available. While fish in the 9" and over size range are common, fish over 12" are not and never have been. Probably only 5% of the crappie I catch are over 12". On an average this would limit my take home catch to 1 or 2 fish per day, which is not worth my time or effort. I also believe that a 10 limit for pan fish is too restrictive for a person looking to bring home fish for dinner. Leave the size at 9" or move it to over 10" if you must, but leave the quantity at 25 fish per day. I participate in catch and release fishing for many species: bass, pike, stripped bass etc. Most of the pan fish I catch are also released. I do not believe pan fish require micro managing. If people want to throw their catch back, that is fine. Limiting peoples ability to bring home fish for dinner should not be on the New York State agenda.

137. I read the article in the New York Outdoor News regarding the changes to panfishing. My entire family enjoys fishing for Sunfish and Crappie on our fly rods. Especially on Silver and Honeys lakes. I can't think of a more pleasant way to spend a spring day. My family does not "sport" fish. We eat what we catch. We aren't out for records, we want to enjoy fresh fish from the lake to the skillet. We have an arbitrary method to ensure the conservation of the fish stock. Besides the state limits and size restrictions on Crappies we try to only keep 6 in Sunnie's. And while we usually catch several Crappies any over 9 in are rare. 10 inch will be even more special but if that is the New limit we will abide by the laws. We can certainly live with the daily limit changes. It just means more trips to the lake to catch enough for a family fish fry. Where I envision a problem is the size limit on Sunfish. The family rule is to throw back the little ones. One rule we have is to never throw back an injured fish. They may not have the biggest filets, but they still taste good. The males are aggressive feeders. Often they inhale a size 16 or 14 nymph or dry fly deep down their throats. They get hooked in the tongue or in their gills. Removing the fly more than likely results in injured fish. With the new regs, these fish will end up back in the lake to slowly die. Not only is this cruel it is a waste of delicious food. By keeping them we are not wasting anything. I certainly do not want to stop fly fishing. That means fewer trips to the lake, that spells less gas bought, and all of the other trickle down economic impacts. Please rethink the size limits.
138. Hello, I would like to just say that I oppose the new draft plans for reducing fish takes from 50 to 25 and also the increase in crappie length.
139. I have fished Honeoye lake every year for Crappie for the past 14 years. Over the years I have seen the average size of Crappie rise from around a 9" average to around a 10" average. My personal best was a 12-1/4" Crappie on Honeoye lake last year. Implementing a 12" minimum size limit on Crappie will drastically impact fishermen from being able to take home any fish for dinner. It is difficult to catch an 11" Crappie let alone a 12" Crappie. If your goal is to prevent people from taking fish home then this plan will definitely work! This of course will drastically reduce the number of Fishing licenses that will be sold! Please reconsider this plan. The population numbers of the Crappie are not decreasing so what does this plan accomplish?

140. I support this plan, I fish Saratoga lake often for both sunfish(mainly bluegill), and black crappie. I think an 8" minimum size for sunfish is a good idea, I personally do not keep any less than 9", and as you know, Saratoga lake already has a 15 fish limit for them and has for years. As far as 12" crappie go, I support this as well, I don't keep any less than 11" now, and would have no problem if it was raised to 12". As far as a limit of 10 goes, ten 12" crappie will be more than a meal for anyone! I once read that the big male bluegill I target in spring, those over 9" are at least 7 years old! If that is true, then they are well worth protecting, and I release a lot more than I keep. As far as the state minimum size being raised to 10" for crappie, I totally support this as well. Same for reducing the limit of sunfish statewide from 50 to 25.
141. I am emailing my opposition to the proposed plan to further limit the number of bluegills and sunfish I can take in one day. I fish Waneta and Lamoka Lakes for panfish to eat. I throw back more small bluegills than I keep most days. I do not catch many crappies in a day. Lucky if I can catch one or two of them a day. So limits on size or numbers of crappies does not affect me. I like to have a fish fry every week all winter long so it takes a few fish to save. I live over 40 miles from the lakes and with the price it costs to get there a lower limit on bluegills I would have to make more trips. The additional cost to get there may not be worthwhile for me. I am retired and on a fixed income. Fishing is one of hobbies I still can enjoy as I get older so please do not limit the number of bluegills and sunfish I can take in a day.
142. I want to voice my opposition to the pan fish initiative as proposed. Specifically I want to address to new crappie limits. I think your proposed change is too drastic both in terms of size and quantity. I think more reasonable numbers are a 10 inch minimum and limit of 15. Or a slot size like minimum 10 inches and max 15. This would help increase numbers and size without being so drastic and still allow for a reasonable catch to take home.
143. Two years ago, I proposed the same type of plan to STEVE HURST of the DEC at our fall NYSCC MEETING AND BREAKOUT SESSIONS. I represent LIVINGSTON COUNTY as the vice president of the LIVINGSTON COUNTY FEDERATION OF SPORTSMAN CLUBS to our parent NEW YORK STATE CONSERVATION COUNCIL. At 73 years old, my main fishing attraction is panfish and my primary lakes are HONEOYE, CONESUS, CANADICE AND CANANDAIGUA IN region 8, and ONIEDA, ST. LAWRENCE RIVER ,AND BLACK LAKE in other regions. I fish a lot and have "seen in all" in the past 50 years. 1) The shift from 50 to 25 sunfish is way overdue. This is a high priority and should be implemented. THE FISHING TECHNOLOGY, especially the new apps, vexalars, sonar, gps and increased participation, have put a real hurt on the big bull sunfish/ bluegill population, (the needed breeders). MY ONLY concern is under fishing and stunting due to lack of food. FOR years you could, at any time, catch 100 bluegills with no one fish over 5 inches in CONESUS LAKE. With the ice fishing explosion and the taking of multiple fish out of the population, the fishing on CONESUS HAS GOTTEN ALOT BETTER, less fish, but a lot of keepers 7-8 inches. (NO BULLS) 2) In regards to CRAPPIE, THE MINIMUM size up to 10 inches; long overdue. THAT population is hurting in many lakes due to over fishing and multiple limits being taken out of circulation. PLUS; most of those "keepers" are 9 1/8 and 9 1/4, AT THE MOST; not even enough for a decent slab of meat. In my travels one of the reasons we have a problem today is that the 9 inch isn't even followed. I have made many people re-measure and throw back fish. 3) In regards to your special lakes, "BIG PANFISH

INITIATIVE". There could be some problems there. I'll represent HONEOYE, since that is my primary target lake. The daily harvest limit of 10 crappie is good; I like that. The 12 inch minimum size is also good for crappie. If you catch and keep 10, 12 inchers, you have enough meet for your families desires. The fish marketers are going to have to concentrate on something else, or cheat and be illegal. 4) Concerning the sunfish PLAN, the 15 keepers might be to restrictive. LOTS of fishermen come to the HONEOYE AREA for the panfish, ALOT OF THEM FROM LONG DISTANCES. That is an economic boost for the area and could be an impact. Also, once you but the 8 inch size limit on them, they become another game fish and must be measured and their creel take must be monitored by DEC game wardens on the lake. The politics of this state have taken many game warden duties and responsibilities away from them. We need to consider this or your plan will fail in it's purpose because there will be lots of cheaters, especially in the spring, when hundreds of ROCHESTER CITY people converge on the spring CRAPPIE SPAWN. You'll have lots of TT's to cross AND ii 's to dot to fully implement your plan to insure success.

144. I am appalled at the proposed panfish regulations; I stand firmly against them. I applaud the goal of increasing the quality of our panfish fisheries, as they are incredibly important. However, protecting them will not make the fish bigger; it will make them smaller, with the exception of certain waters with high growth rates. The problem with panfish is seldom numbers, it is their growth rate. More panfish results in slower growth rates, and an undesirable fishery. Maximizing panfish harvest keeps growth rates as robust as possible, since the remaining fish each get a bigger slice of the pie. Good harvests maintain good fisheries, in most panfish cases. I have never experienced overfishing of a panfish fishery, and I've been fishing for them for 60 years. Doesn't mean it doesn't happen, but it does mean this is not a major problem. What I have experienced on many occasions is stunted panfish populations, where there are so many that the growth rates are so slow that none are worthy of harvest. A major problem when this occurs is that these small panfish eat the fry of predators, which has a negative impact on predator recruitment, which further exacerbates the problem. The solution would be to increase panfish harvest, increasing their growth rates, and reducing mortality on predator fry. Yet you propose just the opposite. I'm incredulous. This is why I stand so firmly against your proposed regulations, at least those on a statewide basis. I'm sure they would benefit select lakes that have rather unique ecosystems. But on a statewide basis these regulations would be a disaster. You will hurt the very fisheries you are trying to enhance. It seems that the current management paradigm is "protect everything"; protectionism is the solution to every problem. These regulations are just another step in that direction. But fish are not managed; the ecosystem in which they reside is managed. You have to look at the bigger picture, and the chain of events you'll set off by protecting individual fish. And none of those chain reactions are good-in fact, they will be disastrous, at least in most bodies of water. Growth of panfish in some waters is already too low. One small water body I used to fish regularly had a decent crappie population, but they did not grow large. You'd see the place dotted with crappie fisherman at night during the ice season. But they were small, and after the 9 inch limit was put in place, I never caught a legal crappie there. And now I never see the night fishermen there-NONE, EVER. The place is poor crappie habitat, but the fishing was good enough that people fished for the small 7-9 inch crappies. This is an example where overprotection, in this case the 9 inch limit on crappies, completely destroyed a fishery. You will do this statewide with these proposed regulations. DO NOT DO THESE STATEWIDE REGULATIONS. Pick out those bodies of water with great habitat where protectionism will benefit the increasing numbers of survivors as well as

the rest of the ecosystem, and implement these regulations individually, body of water by body of water. PLEASE!!!

145. DEC Fisheries staff: Thank you for the opportunity to provide comments on DEC's Draft New York Sunfish and Crappie Management Plan (Plan). Overall comments: - Based on the information presented, it is difficult for anglers to assess the relative pros and cons of the proposed objectives and strategies vis-à-vis impacts to angling harvest opportunities to implement the strategies and achieve the objectives. - While the Plan is sent out for public comment, much of the supporting documentation and definitions of meaningful terms are not readily available to most anglers (e.g. Anderson (1980), Brooking et al. (2018), Loukmas (2020b), professional fisheries journal articles) which poses a challenge for anglers to provide substantive comment. - At a minimum, directing Plan readers to the Fisheries Dictionary on the DEC website: <https://www.dec.ny.gov/outdoor/113291.html> would help provide some pertinent information (e.g. lengths for sunfish and crappie at stock, quality, preferred, memorable, and trophy sizes; definitions of relative weight, proportional stock density and relative stock density). - Providing a table with sizes for stock, quality, preferred, memorable, and trophy sizes for bluegill, pumpkinseed, white crappie and black crappie or sunfish and crappie would make things even easier for anglers and Plan readers to assess draft BPI objectives and foster support for the objectives. - Describing the BPI objectives for the anglers and readers in more simple terms would provide a better understanding of the objectives: o For sunfish, we expect to: ▪ achieve a population size structure such that for all sunfish in a given waterbody that are at least 3 inches long: 70% will be at least 6 inches long, 30% will be at least 8 inches long, and 5% will be at least 10 inches long (70 PSD, 30 RSD8, 5 RSD10); ▪ maintain or improve growth rates such that sunfish will reach 7 inches in length by age 5; ▪ improve the age structure such that 40% of all sunfish that are at least three inches are age 5 and older; and ▪ continue to have fish in good condition (100 Wr) o For crappie, we expect to: ▪ achieve a population size structure such that for all crappie in a given waterbody that are at least 5 inches long: 70% will be at least 8 inches long, 30% will be at least 10 inches long, and 5% will be at least 12 inches long (70 PSD, 30 RSD10, 5 RSD12); ▪ maintain or improve growth rates such that crappie will reach 10 inches in length by age 4; ▪ improve the age structure such that 30% of all crappie that are at least 5 inches are age 4 and older; and ▪ continue to have fish in good condition (100 Wr) as currently presented, I suggest this is confusing to or not understood by most Plan readers. - Providing growth rate data (length at age) for fast, average and slow growing populations of sunfish and crappie would be helpful to the Plan readers and anglers to provide a frame of reference for the proposals (and to level-set what may be misconceptions of the age of sunfish and crappie of a given length). - Similarly, providing current size structure "on average" (PSD, RSD8, RSD10 for sunfish and PSD, RSD10, RSD12 for crappie) for New York populations (or examples via water-specific measures) would provide much-needed background information for anglers and Plan readers. - Providing estimates of annual survival rate for New York sunfish and crappie populations would provide some needed information for Plan readers to substantively comment on the Plan. - In establishing measurable targets sunfish and crappie populations in BPI waters, a desirable "future state" is identified. What is not current described is the current state of sunfish and crappie populations in BPI waters or statewide averages (or water-specific examples) of age structure, size structure and growth rate (length at age) for sunfish and crappie populations. Providing this information to Plan readers and anglers helps to establish expectations for anglers. For instance: on average, a 9-inch crappie (current minimum size limit) is 3 years old so implementation of the 10-inch minimum size limit delays the

harvest of a given year class of crappie by 1 year. If DEC biologists have estimates of survival of New York crappie populations (or use survival rates from the literature) that indicate annual survival is 60%, then 60% of the crappie that are currently 9 inches are expected to be available for harvest in a subsequent year. Anglers are better able to assess their willingness to support the proposal. In certain populations, the delay in legal harvest may be from the spring to fall as 9-inch crappie may grow an inch over the summer. To foster further support, the weight of a 9-inch vs 10-inch vs 12-inch crappie could be presented to so anglers can assess trade-offs associated with delaying harvest. A 10-inch crappie is approximately 30% heavier than a 9-inch crappie while a 12-inch crappie is more than double the weight of a 9-inch crappie and almost double (90% heavier) the weight of a 10-inch crappie (<https://www.dec.ny.gov/outdoor/9222.html>). Similar information could be provided for sunfish. Anglers may be more willing to delay harvest by a couple of years in a BPI water provided with this type of information (speculation?).

Comments on Objectives and Strategies:

- Objective 1 - *Provide sustainable angling opportunities for sunfish throughout the state* seems to be currently met which, I would argue, does not provide support for a change in fishing regulations. Perhaps there are instances of angler harvest leading to unsustainable sunfish populations, but I suggest that, consistent with the Management Philosophy, that “improve the size quality (size structure)” of sunfish populations should be added to Objective 1 or include *Provide sustainable angling opportunities for preferred size (> 8 inches) sunfish or quality size (> 6 inches) throughout the state* This suggested addition provides added rationale for the implementation of the 25 sunfish daily limit to limit harvest and provide sunfish additional opportunity to survive and grow.
- o Strategy 1 – I support the implementation of a 25 fish daily limit for sunfish.
- Objective 2 - *Provide sustainable angling opportunities for preferred size (> 10 inches) crappie throughout the state*
- o Strategy 1 – I support the implementation of a 10-inch minimum size limit for crappie but prefer to see the daily limit be reduced to 15 crappie. Via the increased minimum size limit, we expect improved size structure compared to the current 9-inch minimum size limit. Fewer, larger fish seems reasonable and is largely consistent with creel limits for some northern states (e.g. Minnesota – crappie 10/ day, no minimum size; Wisconsin – panfish 25, includes crappie, sunfish, and yellow perch; Michigan 25 total of sunfishes, includes crappie, no minimum size) and at least one southern water that manages crappie (Tennessee – 15/ day and 10-inch minimum size limit).
- Objective 3 – *Establish sustainable fishing opportunities for memorable size sunfish (> 10 inches) and crappie (> 12 inches) on selected lakes using selected population goals*
- o Strategy 2 – Action A – I support the implementation of 8-inch minimum size limit and 15 fish daily limit for sunfish. Eight inches is a preferred size for sunfish and a daily harvest of 15 preferred-size sunfish per day seems reasonable for a “special” sunfish fishing opportunity. I take it on faith that an 8-inch minimum size limit will lead to more memorable size sunfish, but the implementation of a 10-inch minimum size limit would seem more consistent with what is proposed for crappie. I would not support the implementation of a 10-inch minimum size limit for sunfish but could support a further reduced daily limit of 10 or 5 preferred size sunfish to achieve a higher proportion of memorable size sunfish.
- o Strategy 2 – Action B – I support the reduced daily limit of crappie to 10, but I cannot support the 12-inch minimum size limit. A 12-inch minimum size relegates harvest to only memorable size crappie which seems inconsistent with term “memorable,” particularly when an angler is allowed to keep 10 of them per day. I am curious as to what the current PSD, RSD10, and RSD12 are for crappie in waters proposed as part of BPI. I suspect that the target measures proposed may be close to being achieved under the current statewide crappie regulations and the implementation of the 10-inch minimum size limit will be a step toward these targets. A reduced daily

limit to 10 with a minimum size of limit of 10-inches may find more angler support. o Strategy 3 – gear comparison. Based on my former experience as a fisheries biologist I would be very surprised if any true efficacy will be established between the gear types with the meager amount of evaluation sampling proposed. Gear comparison are tricky and generally conducted over years and various time frames due to the extreme variability of catches in most fisheries. I am not sure that Strategy 3 is really open to public comment and feedback and is better left as an internal document (removed from this plan). Much of the success or failure of this effort falls on angler acceptance of the proposed Plan (initially) and, if implemented, whether or not anglers' expectations are met. There is not sufficient information provided for anglers to have consistent expectations as, based on the information provided, they are left up to their own imagination / anticipation for their expected outcomes. It seems that DEC can better set those expectations with some additional information and discussion (a few points I offered above) that may ultimately lead to broader understanding of what to expect in the size structure of sunfish and crappie populations in their fisheries, acceptance of the proposed actions to move forward, and satisfaction with the results of implementation of the Plan. Thanks for listening (reading).

146. read new draft regs regarding sunfish and crappie..25 is plenty to take per day.. two men..50 to clean is more than a good meal..Hemlock is/ has a good population but few 9 inch bluegill have the carp affected the smallmouth/ largemouth population in canandaigua and hemlock..?
147. Would like to comment on the Sunfish and Crappie Management Plan. Taking it one point at time as presented in New York Outdoor News. 1. Reducing the Statewide daily harvest limit on Sunfish from 50 to 25. I agree and support. BUT what about reducing the daily harvest limit for Perch from 50 to 25 also? 2. Increasing the Statewide minimum size limit on Crappie to 10" from 9" I agree and support. 3 Establishing the Big Panfish Initiative for the waters mentioned. I can't really comment. Do not fish those waters. 4 Implementing a 12 inch minimum size limit on Crappies for select waters listed. I can comment on Waneta/Lamoka lakes. We fish Waneta from April thru September nearly every weekend, plus many weekdays too. We keep about 5 fish fries a season. The fish harvested are Bluegills, Perch and Crappie. The policy in my boat for years has been, if we are keeping Perch and Crappie they must be in the slot of 9" to 11" We release all Perch and Crappie under 9" and over 12". So now in order to harvest Crappies we will need to keep the 12" ones we have been releasing right along! I am ok with that but find it a bit ironic. I do support the the 12" size limit on Crappies for Waneta/Lamoka along with a harvest limit of 10. Lets see how it goes. BUT if Statewide we can only keep 25 Crappies and 25 Sunfish for a daily harvest limit, let's also have a daily harvest limit of 25 for Perch?
148. Thank you for the opportunity to review the draft Sunfish and Crappie Management Plan. Great to initiate a focused panfish management effort for the Bureau. Long overdue. This brings attention to the importance of sunfish and crappie in New York's fisheries resource base and brings recognition to the possibilities of improved management. I think it might be a bit truncated to fully function as a statewide species management plan in that it does not provide much in the way of baseline information on NY's sunfish and crappie populations or fisheries. Adding a lead-in chapter outlining the distribution of these critters (by species) in the state, their basic life histories, behaviors, habitat preferences as well as examples and ranges of population statistics including length at

age, length-weight, relative abundance, mortality rates etc. would greatly add to the future reference value of the plan and also bring a sense of assurance to readers that we are “on top” of the science and characteristics of these species. A review of what is known about the fisheries as to participation, catch and harvest rates, angler characteristics and fishing techniques would add to this. Also, background information should include a review of past and current management theories and protocols in the State and perhaps a chronology of harvest regulations history. Together, such a body of information would provide the reader with a much better perspective on the status of these populations in NY and allow a much better foundation for explaining any proposals for new actions.

I would suggest also that a solid management plan should address known resource issues (or perceptions) such as, in this case, commercial hook and line fisheries, hooking mortality potentials, public access, and law enforcement.

All this would obviously require substantial and maybe tedious research and writing but would really pay off long term and in the efficacy of a final plan.

The other item I really have problems understanding is the origin of the Big Panfish Initiative (BPI) project. I honestly do not find anything in the background information supporting this proposal. The crappie special reg proposals are particularly troublesome because I think they could be very detrimental to existing fisheries (including mine obviously) without any clear justification or positive purpose. The background data presented actually seems, to my reading, to argue against a 12” minimum crappie size limit.

The BPI write-up does not provide the reader any perspective on the expected characteristics of the resultant fisheries. With an RSD12 of 5%, would anglers have to catch 20 fish to harvest 1? Might stockpiling “stock size” fish reduce growth and recruitment into the 12” category? Might cannibalism by stockpiled adults impact yearclass recruitment? Might hooking mortality offset reduced harvest? Would excessive hooking mortality create user perceptions of resource waste? Would there be adequate law enforcement? Might hooking mortality call for proposals for “artificial lures only”? Some explanation of how these items might potentially impact achieving BPI objectives would help assure anglers that they have been taken into consideration in formulating the proposals.

Another difficulty is the seeming uncertainty and potential length of any evaluation effort. Should the proposed rules turn out to be counterproductive, they may remain in place for decades before withdrawn.

Bottom line, I believe, is that the proposed BPI program is very premature. Too many questions and unknowns and too little supporting information or logic to gain adequate angler support.

It might be best to consider the option of recalling this document as a “Statewide Plan” and reissuing a revised version as a “Sunfish and Crappie Management Prospectus.” This would still provide a good beachhead for more focused work on panfish management. Such approach could still legitimately support and recommend enactment of the proposed, incremental “statewide” sunfish and crappie regulations as a “conservation safety net” pending the development of more comprehensive population data, angler input and sampling protocols.

The following comments address more specific components of the draft plan. These were developed in consultation with Mike Gann and Kay Sanford, whom, as you know, share long careers in managing New York’s fisheries resources. Mike as biologist and Fisheries Manager of DEC Region 3 and Central Office Section Head and Kay as a highly regarded fisheries biologist of DEC Region 4 and a lifelong panfish angler on Saratoga Lake, Canadarago Lake and Goodyear Lake.

We thank you for considering these well intended comments in the spirit of professional discourse and sincerely wish the Bureau the best of luck and success with whatever program you decide to proceed with.

Specific Comments on Sections of the Draft Sunfish and Crappie Management Plan

As noted above, it is positive that the Bureau is beginning to take a closer look at panfish fisheries. The draft plan is a good start at fleshing out options and needs but leaves, I believe, some serious questions and concerns about the proposed BPI - primarily regarding the 12" minimum size crappie proposal. Also, we are concerned about the short timing of the public review process and the intended implementation prior to obtaining a reasonable set of baseline data and a tested sampling protocol.

Has there has been any targeted contact with stake holders like the Lake Associations or with area tackle shops to alert them to the proposals? After all, this is the middle of winter? There seems to be very little reference data on which to evaluate the future effect of any new regulations. Recent fish surveys and creel surveys pretty much totally missed sampling either the crappie population or the spring fishery of Saratoga Lake. It seems premature to start implementation of such disruptive regulations changes without an adequate baseline to compare with.

Lots of questions on the purpose and objectives of the special (BPI) regulations:

1) Where is the demand for a trophy only, largely catch and release crappie fishery? What constituency has sought such a thing? Why change management regimes of a perfectly healthy, good quality, self-sustaining fishery in which a high percentage of the catch is already of "desirable" or "preferred" size? Why manage any "pan" fish resource to reduce harvest by 90% so anglers can catch a few more "memorable" size fish? Are we just experimenting as to "what might be possible" without really considering the effect on the users? Is the goal of a panfish fishery really understood? i.e., providing anglers with a reasonable harvest of quality size fish. I cannot envision many anglers happy to throw back a fat 11" crappie when they are panfish fishing.

2) How can the BPI rules ever be evaluated with just one year of baseline (with stated "new" sampling protocols) on populations that are obviously year class variable? Especially when, based on our 2020 angling experience, the Saratoga crappie population seems to be in a low abundance phase now? Any estimates of annual survival/mortality require multiple year sampling or marking/tagging studies.

3) Many years of observation of the fishery suggest that most of the crappie harvest is by spring "minnow and bobber" anglers. What do we know about the hooking mortality of bait caught crappie? My guess is that it is substantial but, since we fish with artificial lures, we have no personal experience on this question. Clearly, a 12" minimum size limit will require sorting through many multiples of sub-legal fish to acquire a take home catch. If that would even be possible.

4) Can there really be any meaningful degree of enforcement on such unexpected and counterintuitive rules? If anglers do not buy-in on rule changes and enforcement is sparse and thus angler compliance low, there will be no actual rule effect to evaluate. Sufficiently meaningful angler compliance will also necessitate a vigorous, continuing and targeted public information program.

5) Implementing a 10" statewide crappie size limit makes sense. It provides another year of protection without drastically impacting the yield. A statewide 15 fish creel limit seems a more reasonable harvest regulation to distribute catch and maybe improve overall quality. Also, such would be more germane to the findings of the recent panfish harvest questionnaire. There were no indications in that survey that anglers are looking for a minimum harvest "memorable size fish only" fishery.

6) It seems most sensible to first monitor a 10" minimum size limit impact on the Saratoga (and other BPI waters) fishery as part of the implementation of a new

statewide regulation for a few years to see what improvement in size structure this alone makes.

7) After going through a major (and well done) effort to simplify trout regulations, why in the world would the Bureau want to now embark on developing a series of special panfish regs? Especially when there is no interest group (that we are aware of) that is requesting such complications.

8) We have no issue with the 8" bluegill proposal for Saratoga since this size fish currently make up a reasonable portion of the Saratoga population. However, from a general angler perspective, do we really need more "special regs." A statewide 7- or 8-inch sunfish limit would negate commercial sale of these fish and probably have much more impact on overall panfish quality. This "elephant in the room" is not even mentioned in the plan. Probably a smart tactical decision but not really "transparent."

9) If it is desirable to experiment with such radical harvest restrictions and untested sampling protocols, why not do it with a couple 50–100 acre lakes that would be easier to manage and evaluate rather than a large public lake that just happens to be "the primary warmwater fishery" for the entire Capital District. A misstep here would impact the maximum number of anglers.

Page by page comments

Vision.

At some point, the plan should explain the basis for believing that NY anglers' views and values include "special opportunities" to catch large panfish in suitable waters i.e., beyond the established desire to have sustainable populations of quality size panfish.

Where did this expanded vision come from??

Management Philosophies.

Good but should explain how and why crappie fill a unique panfish niche in NY. Again, need to detail somewhere in the plan what are the envisioned catch and harvest characteristics and hooking mortality associated with unique fisheries in special waters.

Scope.

Good

Need.

Good to identify that sunfish and crappie provide harvest-based fisheries. It would help obtain angler support if you could reference actual NY example(s) of where liberal bag limits and intense harvest have had impacts on population structure. It is likely that it has occurred, but it would help bring home the sense of need if local examples could be presented to the readers.

Again, it would boost credibility if examples were provided of waters where current harvest regulations are believed to prevent sustained harvest of quality size panfish. Do we actually have any real data (or reasonable estimates for that matter) on panfish harvest rates for any NY water? Especially for the chosen "special BPI waters." This is a scary position from which to launch more special regulations. If there are examples, they should be given somewhere in the plan. Also, again, what is the basis for determining that there is any angler "need" for special panfish fishing opportunities?

Literature Review.

The references and findings set out for the bluegill considerations are fairly convincing. Information on the size of these example waters would help. Were they all small lakes? Is there an example of sunfish harvest regulations effecting populations in lakes the size of the larger BPI selected lakes? Would be reassuring to provide this detail.

The references regarding crappie are sparse and problematic in that they don't provide any actual cases where something as drastic as a 12" size limit was evaluated. Most refer to "simulated" fisheries and did not include a 12" minimum size test. The one real case cited (Webb and Ott) involved going from no size limit to 10". Iserman found that a

10" limit would increase the number of 12" crappie. So, the reader is left wondering what the basis would be for applying the world's first 12" limit in NY lakes.

Angler Opinion.

Good information but seems to need much more supporting details for the BPI proposals. As noted, there were no questions asked about size limits (or crappie) in the angler surveys. No particular reason to believe that the results "suggest anglers would favor" the size limit proposal or especially a change as radical as a 12" crappie minimum. Without further information, the reader has to conclude that there is actually no angler opinion information available at all for the BPI size limit proposals. Intuitively, it seems reasonable to assume that anglers would like to catch (and harvest?) "desirable" size crappie but 10" has long been identified as "the" desirable or preferred size.

Approach.

Good start. Need to explain why a statewide reduction in crappie creel limit would not be helpful in distributing harvest and improving population structure. There is a mention of this in the lit review but not very persuasive. Just given the usually larger size of harvested crappie (compared to sunfish), a 15 or at most 20 fish crappie limit would be more than comparable to a 25 sunfish limit in take home value and, if nothing else, work to suggest the need for some conservation. Again, the plan needs to explain what are the intended "special fishing opportunities" as far a catch and harvest estimates. What could the angler expect to harvest and how many "memorable" size fish would they encounter relative to total catch. What would be the trade offs in hooking mortality? Would not the special fishing for crappie be mostly a catch and release pan fishery? Very important to consider these questions.

An effective regulation enactment date of January 2022 seems grossly premature given the current lack of baseline data (at least as to what is presented in the plan) on either crappie populations or the fisheries. How can the changes be evaluated with little or no pre-treatment data?

Objective 1. Statewide Sunfish.

This seems very appropriate and should have no serious impact on the vast majority of anglers. And it is clearly supported by the angler questionnaire results. Some evaluation based on previous fishery surveys regarding size structure may be possible.

Objective 2. Statewide Crappie

Again, this (10") seems quite reasonable based on "conservation and equitable harvest distribution" considerations. It would have some impact on angler harvest (numerically) in some waters, but it is probably acceptable by most anglers as an incremental measure to improve quality. It should be possible to support this with a yield model that calculates harvest weight vs size limit. Such would add some science look to the plan also.

As noted above, a statewide 15 fish (rather than 25) per person crappie limit would be very sufficient (and only occasionally obtained) as a daily creel limit for the vast majority of anglers. Two people fishing equal 30 crappie of 10" or more.

Objective 3. Big Panfish Initiative.

Is it appropriate to set population size structure goals on "sunfish" as a group? These species can differ substantially when present in the same lake. For example, Saratoga Lake contains bluegill, pumpkinseed and redbreast sunfish (and some hybrids). The bluegills and pumpkinseeds seem to have fairly similar size structure, but the redbreast sunfish are all small. It might be better to pick the dominant sunfish in the water (or fishery) and base management size objectives "specifically" on that species.

This (BPI) is the weakest element of the plan in that there is no supporting evidence of its need or purpose and no explanation of the potential impacts on current fishing activities. The goal of the plan should be to provide NY anglers with quality size panfish

fisheries and not to experiment with important fisheries already of good quality by replacing them (as proposed for crappie) with catch and release fishing for “memorable size” panfish. As cited in the literature review, prior studies and simulations of the proposed statewide harvest regulation (10”) were shown to substantially improve panfish size structure. Where does the radical “memorable” size objective come from?

Strategy 1.

Select lakes. Not to seem totally NIMBY but criteria for lakes includes “fast” growth and Saratoga Lake is listed as n (no?) in Appendix A. Surprising that it is not in the fast category. And, if it is not, why is it included as a study water?

Strategy 2.

Actions A,B. BPI objective is to provide opportunities for memorable size sunfish and crappie. Why is the proposed length limit for sunfish 8” (preferred size rather than 10” memorable size) while the minimum limit for crappie is not preferred size but memorable size (12”))? Furthermore, if literature and modeling indicate that implementing length limits at preferred size also substantially increases proportion of memorable size fish, why is that not a sufficient approach to improve size structure and continue to allow a reasonable harvest?

If we are discounting creel reductions as an effective means of improving crappie population size structure in the statewide regulation proposal, why is a reduction to 10 fish included in the BPI rules?

Evaluation. Without substantially more baseline data on crappie populations and angler preferences, it seems premature to implement controversial harvest regulations that will substantially impact a large group of anglers. What if sampling this year indicates that PSD and RSD values are already largely being met in some of the selected waters? How is it known that current levels of “angler satisfaction” are not already at the 66% target under the existing management approach in BPI waters? Are there any “pre-rule change” surveys planned to compare future angler satisfaction values? Will the proposed regulations be rescinded if targeted population size structures are found but angler satisfaction objectives are not?

Strategy 3. Determine standard sampling protocols.

The evaluation of different sampling gears would seem to be a prerequisite to establishing the baseline and study plan and not a concurrent experiment. Not sure it is appropriate to go ahead and enact regulations before establishing a solid baseline data set to compare against. This seems especially true when dealing with populations that are (inherently?) variable from year to year.

Just as a matter of interest, it would also be nice to explain to the reader why existing centrarchid sampling protocols are not sufficient to monitor size structure and catch rates (relative abundance). Explaining, for example, why established spring electrofishing protocols would not provide an adequate and more efficient sampling regime.

Timeline.

As noted above, the scheduling of regulation implementation by 1/1/22 seems unreasonable. Adequate time for public comment, discussion and response to constituent questions is not provided. The plan provides a working document to begin formulating much warranted panfish management programs. However, it would seem desirable to first collate and present a much more extensive set of past and current population and panfish fishery statistics for New York waters to confidently envision the status and potential for future management. The proposed statewide harvest changes are incremental and might go forward rather quickly and accomplish a reasonable and probably well-accepted conservation safety net. However, a serious rethink of more drastic harvest restrictions is necessary, and such should eventually be supported by solid angler opinion and population data.

149. Hello DEC Team:

I have read the online draft proposal carefully and twofold.

I would like to submit the following feedback:

Sunfish:

1. Sunfishing in NYS has always been an activity targeted for or by the youth of New York State.

2. Vs all the other “game fish” which are tightly regulated with rules and size limits and daily limits and calendar seasons.

3. Excessive size regulations attempting to pacify “Grumpy Old Men” , in believing they will be able to harvest buckets of “trophy sunfish” , will leave many youth returning empty-handed on a high percentage of fishing outings.

4. Many DEC ponds and lakes my family personally fish annually are filled with stunted sunfish 3-6”. Dryden lake, Lake Como, Long Pond, Round Pond, Cayuta Lake, Little York Lake etc and have been for 30+ years

5. Certainly new regulations it would be discouraging to plan a 4 hour round trip drive to Silver Lake or Honeoye , knowing your harvest will be limited to 15 sunfish.

6. LEAVE THE SUNFISH SIZE LIMITS AS THEY ARE PLEASE !!!!! ALL SIZES PERMITTED!!

Crappie:

1. It was not evident how the 1400 survey responses yielded a conclusion that the Statewide Crappie Size limit should be increased from current 9” to 10” ?

Although no formal angler opinion survey of crappie anglers was conducted, NYSDEC Bureau of Fisheries believes that New York crappie anglers hold opinions similar to sunfish anglers and would be supportive of more conservative harvest regulations if those changes were likely to provide more sustainable opportunities to catch crappies of desirable size.

2. Again many DEC waters local to me will be punished by this quest for the 10” crappie “unicorn, as it is not attainable.

General Draft Feedback:

1. **Considerable “guessing” , opinions” and “ surmising”** appears to be the foundation for the New York Sunfish and Crappie Management Plan . Rather than being data driven with actual recent 2020 netting numbers and population assessments,

a. **There is, however, concern** that the existing daily limit could result in overharvest

b. **There is a concern** that the current harvest regulations don’t adequately provide this

- c. **These results suggest** that anglers are likely to be open to other management options
 - d. **would likely** improve population size structure
 - e. increases in the minimum length limit **are likely** to be more effective
 - f. They concluded that minimum length limits **may moderate** or eliminate age class
 - g. increase in the minimum size limit **is expected** to improve population size
2. What is the rationale for waiting 3-4 years before assessing results?

March 31, 2025 Conduct initial assessment of BPI program by conducting standard trap netting surveys to evaluate fish population changes and collecting angler information via online surveys to determine their satisfaction 4/1/24–7/1/24 Conduct initial angler surveys to evaluate statewide sunfish and crappie regulations 7/24

Hence it Appears the draft isn't the best it can be. Rather than basing on high quantity of fisherman feedback. Its rather based on low quantity of feedback , studies done by folks outside of NYS , lots of hypothesizing and guessing , and lack of actual recent 2020 netting data in the NYS "target lakes" to use as a foundation a

150. As a grandmother of 5, I have taken my grandkids fishing numerous times. It is a great way to get them off the computers and ipads and get them outside. It's also a great way to gather the family and see the joys on those faces when they catch one and measure it to see if we can keep it and eat it. The memories and pictures are priceless as they grow into bigger fishermen and fisherwomen. My dad took me fishing, I took my two boys fishing, and now we are fishing with their kids. Ages 5 to 18. It's a great tradition to pass along from generation to generation. The "Big Panfish Initiative" is something that really disappoints me. It's hard enough to catch fish that are big enough to keep now. If you put these new size limits into place, my grandkids could fish for hours and never be able to keep a single fish and that will discourage them from wanting to go fishing. It's a special treat to eat what you catch for dinner plus it's good for them and they really love them. The best thing is hearing them yell - It's a "keeper". I've been fishing since I was a kid and I never remember catching Crappie bigger than 8-9 inches. Maybe once in a while you'd come across a 10" or maybe even an 11" but it is rare. In order to keep a crappie with this size increase it would have to be at least a 5-7 year old fish. Lakes would be full of panfish as they would need to be 3-5 years old to be big enough to keep.

Please do not increase the size of Crappie and Panfish. It's too bad that more time and money isn't spent on more important things. There isn't a shortage of these types of fish. You still need to spend time and money to catch what you can and release the smaller ones for next year. These size increases will not stop the people that keep more than they should or people who keep smaller than they should. This only hurts the ones who abide by the current laws and requirements. This would be one more thing to keep kids from finding ways to get outside and learn about nature and harvesting what you spend time and effort into catching.

151. Regarding the so called "Big Panfish Initiative, I as a crappie fisherman have a few thoughts. You indicated that research shows that reducing harvest limits and increasing size limits can improve fishing opportunities. I'm not sure who was part of the research, but I'm fairly sure they were not crappie fishermen or they would have told you just how hard it is to catch a 10" crappie! I am involved with a group of guys who take 2 weeks' vacation each year to pursue crappie. After fishing hard for 6 days each week, we look forward to dividing up the fillets for our dinners and fish fry's for family, grandkids and close friends who do not get a chance to enjoy them very often. If these new "ideas" go into effect, I'm sure the 10 of us, would look for a more fisherman friendly state to take our vacations, fish and spend our money in. If i was polled on this topic, my vote would be NO Change.
152. I laughed at the D.E.C.'s new Crappie Management Plan when I saw it. What this "Plan" will do is kill off us older crappie fishermen. We already went through this some 40 years ago and to be honest, I didn't see the benefits that program did by setting the size limit to 9" and 25 fish per day. That in itself is a big enough restriction. Also I'll bet a call to all the rental business's on the Crappie lakes will bring a response worth listening to. On top of that, now the D.E.C. is devising a plan to install antler restrictions on buck harvesting. So based on someone's opinion of what they think regulations should be, I can only keep fish that measure up to someone else's expectations and shoot bucks that someone else thinks should have more horns. Sometimes it's better to wait and see what problems arise rather than create problems themselves. Have you ever heard the saying "If it's not broke, don't fix it".
153. My name is Trey Weitzel and I am 8 and a half years old. My Papa and my dad take me Crappie fishing and Blue gill fishing and I like it alot. It's hard to catch the big ones and I hope you don't change the sizes on fish. Fishing is fun and my little brother is almost old enough to go and it won't be fun if we can't keep any.
154. I think the size limits should stay the same. If needed in some waters the daily bag limits could be reduced.
155. I just want to applaud your new Panfish regulations. Something needs to be done to combat the unethical overharvesting that goes on across the state. The pandemic is putting even more pressure on our fisheries. The advancements in technology and popularity.of ice fishing also makes it too easy for average anglers to decimate populations, especially on the smaller water. There is an organized effort by some of the worst offenders, the fish sellers and people that target the spawn year in and year out to try to stop these regulations. Please don't cave to that pressure. The science supports this and it is very necessary. I also urge you to make fish selling illegal. Again, the added recreational pressure and the technology/tackle we all can use is a recipe for disaster. I have seen the impact on the St. Lawrence and Finger Lakes already.
156. The New York State Conservation Council, on behalf of its membership, submits the following in support of the proposed Sunfish and Crappie Management Plan . Comments are based on the polling of our membership and the input from the NYSCC Fish Committee
To echo the comments of the Finger Lakes Conservation Council and others, as angler techniques have improved, along with improved tackle and modern electronics, there is added stress on panfish numbers. Panfish overharvesting, especially at critical spawning time, plus their willingness to bite, has harmed panfish populations on many of

New York's prime panfish waterbodies. The belief that panfish cannot be fished out, has gone the way of many old fishing falsities. It is encouraging that angler surveys showed positive thinking for more conservative panfish daily bag limits. Through increased popularity and better fishing techniques the average anglers daily catch has risen dramatically. Furthermore, as more anglers are targeting these tasty fish, the impact on our panfish population is increasing. The NYSCC Fish Committee unanimously agreed on the proposed sunfish daily creel limit reduction from 50 to 25.

The increased recognition of crappies as a targeted panfish has created increased pressure on this species. In most cases, the change of 9" to 10" crappie regulation will have an overall positive impact on crappie size and numbers. While we have received some negative input on this size change, overall, most thought it is worthgiving this size change a try.

The New York State Conservation Council also supports the Big Panfish initiative and harvest reduction for specific designated waterways. The sunfish and crappie, in the past, were seen as being subject to minimal regulations. Times have changed so, the ability and the opportunity to manage these fish species soundly and scientifically is here. These changes are supported by the Council membership. It is also recognized by our membership that the future study of these changes, once implemented, may lead to further management initiatives as more is learned. While New York is well recognized for its world class salmon, trout, and bass fishing opportunities, it is a welcomed feeling to know that the DEC also recognizes the panfish and crappie fishing opportunities that also exist in New York State.

157. The Finger Lakes Conservation Council (FLCC) is pleased to see the NYS Department of Environmental Conservation's (NYSDEC) draft of the Sunfish and Crappie Management Plan. As angler techniques have improved, along with improved tackle and modern electronics, there has been added stress on panfish numbers. Panfish overharvesting, especially at critical spawning time, plus their willingness to bite has harmed panfish populations on many of New York's prime panfish waterbodies. The belief that panfish cannot be fished out has gone the way of many old fishing falsities. It is encouraging that angler surveys showed positive thinking for more conservative panfish daily bag limits. Therefore, the FLCC, representing organized sportsmen for Region 8, supports the 25 sunfish daily harvest limit for NYS waters. Crappies have become a premier panfish countrywide over the last 20 years. New York has some very good crappie waters. In most cases, the 10" crappie regulation will have an overall positive impact on crappie size and numbers. No doubt, there will be some negative input from some anglers. With the plan to survey angler satisfaction and fish populations, the FLCC supports the 10" statewide crappie regulation change. The plan for a big panfish destination lake in each region is a very good proposal. By reducing possession limits and increasing length requirements, more panfish anglers should have the opportunity to catch large panfish. With a designated big panfish lake in each region, it affords a closer to home trip for this experience. The FLCC supports Action A – 8" length and 15 in possession for sunfish and Action B – 12" length and 10 in possession for crappie. However, some angler concern has been raised regarding Honeoye Lake in Region 8. The issue is that while Honeoye Lake has been a premier lake for large bluegill and sunfish, crappies have not shown the growth potential to warrant the 12" length limit.

158. I support a 10 inch minimum crappie size statewide. The present 9 inch Minimum removes potential larger spawners and and don't provide enough Meat to make them worthwhile. At what age do the NYS crappie first spawn? The special

regulations lakes in the proposal be regulated according To what DEC studies discover in specific lakes. Many anglers enjoy catching and keeping sunfish/bluegills that are smaller Than others consider taking. Several bodies of water I fish have large numbers of small panfish but also Support large populations of smallmouth and largemouth bass.

159. I'm emailing my support for the proposed changes to sunfish/crappie regulations. Especially given the recent attention to issues of social and environmental justice, it seems increasingly prudent to allow all outdoor enthusiasts to have an opportunity to have a successful angling experience. The proposed regulations should also curtail commercial sale of these species. It seems hard to believe that in the 21st century we are permitting anglers to sell large numbers of fish harvested from public waters. We do not allow individuals to harvest and sell timber from state lands and it seems hard to believe that comparable actions are permitted on public waters. Nonetheless, the proposed regulation changes will be a step in the right direction towards allowing more equitable access to public resources for all anglers. Thank you for your continued efforts to manage our inland fisheries.
160. i think these new regs you are considering should be implemented state wide. i believe by targeting specific lakes with these limits will be putting more stress on other lakes with panfish. I sure hope that in the near future the statewide daily limits get reduced. I do most of my panfishing during the winter months and i see way to many times fisherman that target panfish will just pound on them day after day then turn around and sell them. Most of these fisherman dont even eat them. They are just out to make a quick buck and rape the lakes. Zero ethics apply and most of the time these fisherman just walk them off the lake and stash them and go right back out to catch more.
161. i previously sent a comment on the limits and forgot to mention something. im not sure why the weed beds in most of the lakes are disappearing at an alarming rate. Ive noticed the panfish fishing populations have greatly went down hill. i dont understand why this has been done.
162. I'm emailing my support for the proposed changes to sunfish/crappie regulations. As an avid catch and release angler and environmental steward I fully support the effort to allow future generations to have an opportunity to have a successful angling experience for larger and more plentiful fish. Pan fish are an often over looked, and over abused portion of the fish community due to their plentiful numbers and small size. I feel the proposed regulations should also address the commercial sale of these species. It is hard to go to any popular fishing spots, especially through the ice, and not run into a group fishing solely for this purpose. It seems hard to believe that in the 21st century we are permitting anglers to turn a public resource into a private commodity. We cannot bottle the water from a reservoir for resale and we can't catch fish and sell them for use as bait, but people are allowed to take their limit everyday and sell them as a food commodity. I feel this is both unsafe, and unsustainable for the future of our fisheries. Thank you for your continued efforts to manage our inland fisheries. I know these new regulations will have a meaningful impact for me and my family.
163. I would like to voice my support for the proposed changes to the Sunfish and Crappie creel and or size limits. The 10" minimum length for Crappie is definitely needed on Chautauqua Lake. I would support reducing the Crappie creel limit as well.

164. I agree with the plan concept but believe that in addition to a 10" minimum for crappie, that daily limit should be reduced to 15 fish. No good reason to take more for a meal. I think increasing the size limit to 10 inches for crappie would be great because I see guys keeping 8 inch fish. Also it will give the fish another year to spawn increasing the population. I would like to see the size limit increased on Black Lake to maybe 11 inches for a few years to get that lakes population up. Lowering the daily take is also a good idea for both sunfish and crappie. As a side note I think lowering the daily limit on perch would be good because it is hard to find decent size perch any more, except on the larger lakes. Guys are complaining of just catching dinks. In one post on IceShanty someone suggested of keeping 6 and 7 inch perch because he did not catch any big ones. This comment relates to Sodus Bay and Irondequot Bay, Long Pond and Cranberry ponds in Greece. I fish over 100 days a year and seeing these changes would be good.

165. After reading the Sunfish Plan I find favorable the adjustment of the sunfish limit from 50 fish per day to 25 fish per day. I also find favorable the increase of size limit from 9 inches to 10 inches with a 25 fish per day limit for crappie. I am somewhat surprised the Sunfish Plan does not address rising water temperatures caused either by climate change, land uses in the watershed or from some other factor. There is little dispute that waters are changing and temperatures in some waters are rising. I would have expected this Sunfish Plan (a ten-year plan) to project how these changes might affect the Centrarchids referenced in this Sunfish Plan. Will warming temperatures increase the possibility fish kills from fish pathogens like *Aeromonas* bacteria or perhaps the expansion of other warmer water tolerant Centrarchids like the green sunfish population? If so, how so? The Sunfish Plan also leaves out any mention of invasives. With many watersheds across New York State compromised by invasives like the round goby wouldn't this Sunfish Plan be the place to explain how the Centrarchid population is being affected and how they might be altered in the future? Is there any predation on the sunfish family or their nests, eggs, fry, fingerlings or forage resources by these invaders? What about invaders which might be the next to inhabit New York waters, like the large-scale sand smelt? With regard to the Big Panfish Initiative (BPI) I offer the following: What criteria went in to choosing the waterbodies in each Region? It might be beneficial to only include BPI waterbodies that have DEC access or at least other free public access where possible. In the case of DEC Region 7, Otisco Lake is a valid choice as it has a very good sunfish and crappie population as well as a new DEC free public boat launch which was just established. However, I do not feel Cazenovia Lake is a viable choice for the follow reasons: □ Cazenovia Lake has very little public access. □ The only trailered launch available to the general public has a mere nine trailer parking areas for those from away (outside of the Cazenovia School District). □ This launch also requires a \$75 per year pass in order to use the launch. □ A State Park also located on Cazenovia Lake, does provide some ice fishing access as well as a summer car top launch, but the parking area for this site is meager at best. □ Cazenovia Lake is also situated quite close, within twenty miles of Otisco Lake. Conversely, Whitney Point Reservoir, located in Broome County has a DEC boat launch and parking for close to 50 trailered vehicles - free. Whitney Point Res also has a municipal park where a person can rent a boat for the day, alleviating the need to bring a boat at all. Whitney Point Res also holds an ice fishing derby for crappie and has a very good population of other sunfish. Furthermore, using Whitney Point Res as the other BPI lake in Region 7 would allow for better distribution of the BPI lakes within the Region and fill a gap in the southern tier portion of New York State map associated with the Sunfish Plan. I also believe changing the existing regulations regarding the sale of all Panfish would be worth discussing as part of a ten-year sunfish management plan. Lastly, any regulation established for a BPI waterbody must have a provision which excludes children from the sunfish eight inch size limit portion of the regulation. I cannot see how making it illegal for a child to catch, keep and take home to eat a 7 (seven) inch sunny, could possibly help with the recruitment of future anglers.

166. Freshwater recreational fisheries in New York generated an estimated \$2.138 billion in economic activity and supported 10,961 jobs in 2017, with panfish accounting for an estimated 11.3% of angling effort (Responsive Management 2019). New York fisheries resources, including panfish resources, have important economic and social value. Management decisions must be based on sound science to ensure the full value of these resources to New York residents and fishing license holders is achieved. There are major issues with the proposed New York sunfish and crappie management plan (NYSDEC 2020) that fall into two categories: 1. issues with the sunfish angler survey (Loukmas 2020a) and 2. issues with the availability and interpretation of biological data. The analysis presented in the draft New York sunfish and crappie management plan (NYSDEC 2020) is deeply flawed and any conclusions drawn from this are therefore invalid. Implementing the regulations proposed in Objectives 1–3 of the draft New York Sunfish and Crappie Management Plan at this time would be irresponsible and not based in science. According to the draft New York Sunfish and Crappie Management Plan, the decision to implement proposed regulation changes outlined in Objectives 1–3 was based largely on results of the Sunfish Angler Survey (Loukmas 2020a). This survey was delivered by email to 147,000 subscribers to a NYSDEC newsletter (Loukmas 2020a). The design of this survey is fundamentally flawed because it is directed toward a small subset of the more than 900,000 licensed anglers in New York. Anglers subscribing to this newsletter and identifying as sunfish anglers are likely more avid than the general angling population (Wilde and Ditton 1994). Therefore, the opinions of anglers subscribing to this newsletter are likely not representative of the overall population of anglers. Respondents selected themselves and were not randomly selected, which results in bias (Bethlehem 2010). Loukmas (2020a) uses the number of survey respondents (1,416) as evidence that the results are truly representative of the New York panfish angler population. However, the number of respondents was not large. Even if the number of respondents was large, this is not valid evidence that the results of a survey where respondents were self-selected are representative of the overall population (Bethlehem 2010). Therefore, the results of the Sunfish Angler Survey are likely not representative of the New York panfish angler population and should not be used to make decisions on sunfish management. Additionally, NYSDEC Bureau of Fisheries used the results of the Sunfish Angler Survey to propose changes to crappie *Pomoxis* spp. regulations, stating that the Bureau believes crappie anglers hold similar opinions to sunfish *Lepomis* spp. anglers while providing no evidence for this (NYSDEC Bureau of Fisheries 2020). Although the authors of the draft New York sunfish and crappie management plan (NYSDEC) attempted to review the literature to cite examples where panfish regulations have been implemented, this review is inadequate. The authors chose a small number of papers that show decreases in sunfish daily limits and increases in minimum length limits could improve size structure if specific conditions (e.g., fast growth and low natural mortality) are met (Paukert et al. 2002; Jacobson 2005; Rypel 2015). These studies were all done on small bodies of water and the size of a body of water can have important implications for sport fish population characteristics and their response to regulations. Pritt et al. (2019a) found that a nine inch minimum length limit only increased crappie length at harvest without reducing yield in Ohio reservoirs larger than 1,000 ha. A statewide reduction in the sunfish daily limit would affect waters of all types and sizes and effects on panfish population characteristics would be variable and not necessarily desirable. Rather than implanting regulations based on a limited selection of examples in the literature, NYSDEC Bureau of Fisheries should use examples from the literature as a starting point to guide modeling exercises using biological data from the populations in question as in Pritt et al. (2019a) and Pritt et al. (2019b). Unfortunately, no valid biological data are available to properly evaluate

potential responses of panfish populations to the proposed regulation changes. Instead, some anecdotal notes are provided in Appendix A (NYSDEC Bureau of Fisheries 2020). To make valid inferences using comparisons of fish populations through time and space (among populations), sport fish data must be collected using standardized methods (Bonar and Hubert 2002; Bonar et al. 2009). Rigorous sport fish population data allow a modeling approach to assessing the tradeoff between length-at-harvest and yield under various mortality and regulation scenarios (Isermann et al. 2002; Pritt et al. 2019a; Pritt et al. 2019b). Furthermore, standardized fish population surveys must be designed to include enough random sample sites to achieve 80% statistical power to detect changes in populations that are meaningful in assessing management objectives (Koch et al. 2014; Neely et al. 2016; Tyszko et al. 2017; Tyszko et al. 2021). Creel survey data allow estimates of angling effort and harvest (Jones and Pollock 2012), which provide realistic mortality estimates for use in modeling exercises. A modeling approach fed by rigorous data allows managers to predict fishery responses to regulations changes, reduces the likelihood of unexpected and undesirable outcomes, and maximizes the likelihood of achieving results that meet the expectations of and satisfy user groups. Rather than recklessly change panfish regulations at this time, NYSDEC Bureau of Fisheries should take an approach that includes a five-year period of collecting biological data from panfish populations, creel survey data, and a well-designed angler survey to understand the beliefs, attitudes, opinions, expectations, and satisfaction of New York panfish anglers (Hunt and Grado 2010; Knuth et al. 2012) followed by a five-year period of collecting these data after the regulations have been implemented experimentally in pilot waters. The before-regulation and after-regulation periods should be separated by a two-year lag period to allow populations to fully realize effects of regulations (Pritt et al. 2019a). Although the proposed New York sunfish and crappie trap netting protocol (Loukmas 2020b) is a positive step in this direction, this protocol does not include collecting an index of density (CPUE), a critical metric for assessing fish populations (Hubert and Fabrizio 2007). Furthermore, using North American standard sampling methods (Miranda and Boxrucker 2009) would allow more powerful comparisons over broad time and spatial scales. The proposed target population metrics for evaluating regulation success in the draft New York sunfish and crappie management plan (NYSDEC 2020) are also a positive step toward science-based management. However, to effectively evaluate the success of regulations using these metrics, rigorous biological data from before and after the regulations were implemented are needed. The approach outlined here would allow NYSDEC Bureau of Fisheries to identify groups of panfish anglers that favor different management outcomes, identify panfish populations that currently meet expectations of and provide high satisfaction for different groups of panfish anglers, and identify panfish population characteristics that meet expectations and provide satisfactions for different groups of panfish anglers. This would also allow NYSDEC Bureau of Fisheries to identify panfish populations where different management strategies would have a high likelihood of success in meeting expectations of and providing a high level of satisfaction for specific groups of panfish anglers. NYSDEC Bureau of Fisheries could communicate this information to direct angler groups (e.g., trophy oriented, harvest oriented) to waters that are most likely to provide the highest level of satisfaction. This science-based approach would ensure that New York residents and anglers would receive the greatest benefit and value from fisheries resources.

References

Bethlehem, J. 2010. Selection bias in web surveys. *International Statistical Review* 78:161–188.

Bonar, S. A., and W. A. Hubert. 2002. Standard sampling of inland fish: benefits, challenges, and a call for action. *Fisheries* 27:10–16.

Bonar, S. A., S. Contreras-Balderas, and A.C. Iles. 2009. An introduction to standardized sampling. Pages 1–12 *in* S. A. Bonar, W. A. Hubert, and D. W. Willis, editors. Standard methods for sampling North American freshwater fishes. American Fisheries Society, Bethesda, Maryland.

Isermann, D. A., S. M. Sammons, and P. W. Bettoli. 2002. Predictive evaluation of size restriction as management strategies for Tennessee reservoir crappie fisheries. *North American Journal of Fisheries Management* 22:1349–1357.

Hubert, W. A., and M. C. Fabrizio. 2007. Relative abundance and catch per unit effort. Pages 279–325 *in* C. S. Guy and M. L. Brown, editors. Analysis and interpretation of freshwater fisheries data. American Fisheries Society, Bethesda, Maryland.

Hunt, K. M., and S. C. Grado. 2010. Use of social and economic information in fisheries Assessments. Pages 425–447 *in* W. A. Hubert and M. C. Quist, editors. Inland fisheries management in North America, 3rd edition. American Fisheries Society, Bethesda, Maryland.

Jones, C. M. and K. H. Pollock. 2012. Recreational angler survey methods: estimation of effort, harvest, and released catch. Pages 883–919 *in* A. V. Zale, D. L. Parrish, and T. M. Sutton, editors. Fisheries techniques, 3rd edition. American Fisheries Society, Bethesda, Maryland.

Knuth, B. A., T. L. Brown, and K. M. Hunt. 2012. Measuring the human dimensions of recreational fisheries. Pages 936–1009 *in* A. V. Zale, D. L. Parrish, and T. M. Sutton, editors. Fisheries techniques, 3rd edition. American Fisheries Society, Bethesda, Maryland.

Koch, J. D., B. C. Neely, and M. E. Colvin. 2014. Evaluation of precision and sample sizes using standardized sampling in Kansas reservoirs. *North American Journal of Fisheries Management* 23:1211–1220.

Loukmas, J. 2020a. New York sunfish angler survey. Bureau of Fisheries Technical Brief. New York State Department of Environmental Conservation, Bureau of Fisheries, Albany, New York.

Loukmas, J. 2020b. New York sunfish and crappie trap netting protocol. Report number #. New York State Department of Environmental Conservation, Bureau of Fisheries, Albany, New York.

Miranda, L. E., and J. Boxrucker. 2009. Warmwater fish in large standing waters. Pages 29–42 *in* S. A. Bonar, W. A. Hubert, and D. W. Willis, editors. Standard methods for sampling North American freshwater fishes. American Fisheries Society, Bethesda, Maryland.

Neely, B. C., J. D. Koch, and M. E. Colvin. 2016. Utility of reservoir characteristics to determine minimum sampling effort needed to assess sport fish populations in Kansas Reservoirs. *North American Journal of Fisheries Management* 36:285–293.

NYSDEC, Bureau of Fisheries. 2020. Draft New York sunfish and crappie management plan. NYSDEC BOF Report Number #. NYSDEC Bureau of Fisheries, Albany, New York.

Paukert, C. P., D. W. Willis, and D. W. Gablehouse, Jr. 2002. Effect and acceptance of Bluegill length limits in Nebraska natural lakes. *North American Journal of Fisheries*

Management 22:1306–1313.

Pritt, J. J., J. D. Conroy, K. S. Page, and S. M. Tyszko. 2019a. Standard assessments reveal

context-dependent responses of crappie populations to a length-based regulation in Ohio

reservoirs. *North American Journal of Fisheries Management* 39:999–1014.

Pritt, J. J., M. A. Depew, J. R. Herrala, H. Hirst, C. R. Jansen, and K. J. Zipfel. 2019b. Spatial

gradients in population characteristics of Ohio River Sager and implications for a length-based regulation. *North American Journal of Fisheries Management* 39:1412–1425.

Responsive Management. 2019. New York angler effort and expenditures in 2017: report 1 of 4.

Responsive Management, Harrisonburg, Virginia.

Tyszko, S. M., M. A. Hangsleben, R. D. Zweifel, J. J. Pritt, and J. D. Conroy. 2017.

Assessing

reservoir Largemouth Bass standardized boat electrofishing: effect of catchability on density and size structure indices. *North American Journal of Fisheries Management* 37:587–598.

Tyszko, S. M., J. J. Pritt, and J. D. Conroy. 2021. Indexing reservoir Channel Catfish population

density and size structure with tandem, baited hoop nets. *North American Journal of Fisheries Management*.

167. I'm not sure where to begin. Who decided there was concern regarding the quality of panfish in this state? Their ability to reproduce is legendary. Just ask any pond owner who stocked his/her pond with bluegill. I have fished otisco lake for almost 50 years and pan fishing has always been a big part of it. I am also an angler diary cooperater. I've done this for almost 20 years. Not once has the dec asked about panfish on otisco. I will tell you that in all my years, I have never caught a gill over 9 inches on otisco and I've caught thousands there. Yes, I've caught plenty of 8 inch fish but the lake really isn't known for its large gills. Putting a length restriction on bluegills would serve no purpose in my mind. Lakes like Oneida and honeoye do produce some massive bluegills. Owasco does too. Not sure why. In fact, the south end of owasco is fished hard for sunfish through the ice and every year I catch huge sunfish(9-10 inches)there year after year despite the pressure. Otisco never has produced these big fishfor some reason but it's not from overfishing. The only panfish pressure the lake gets is at the north end in the winter. You hardly ever see anyone targeting panfish in the summer. I will concede a change to 25 gills a day. That seems reasonable and may be beneficial, but please, no size restrictions on otisco. It has never been a trophy bluegill lake. With respect to the crappies, there are so few in otisco that most folks don't even target them. I've never caught 10 in a day and have never caught one over 12 inches. They are typically incidental catches. I really feel someone has not done their homework here and otisco was just drawn out of a hat for this initiative. Why don't you pick a lake that has a decent crappie population to begin with. Otisco doesn't. Just check the dec shock/net program. Almost no crappies caught. Setting restrictions on a fishery that hardly exists seems ridiculous. 9 inches is a very nice crappie. No need to change the length. So few would be kept.

Thanks for listening to this rant. I know a lot about this lake so please if u have any questions don't hesitate to contact me.

168. I wanted to take a moment to comment on the proposed plans for fishing for sunfish and crappie. I have enjoyed fishing at Honeoye Lake for several years now. Over the years I have seen Honeoye Lake become a more popular fishing destination, especially with people coming down from Rochester. In the past I have heard some of the retired regulars suggest similar ideas to your plan and have talked of the success other States have accomplished. Limiting the number of fish taken out of the Lake and increasing the size limit for each one will provide a long-term benefit to the fishing quality and to the Lake as a whole. I strongly support the proposed plan.
169. The plan looks great. The 50-25 fish limit is a great idea. I am an avid fisherman, both soft water and hard. The fish just don't seem to be there (keepers). I fish at least 5 bodies of water in winter through the ice, and there is not the fish we had 5...9 years ago. Lot of small fish and so far this year it is the worst in some places. I love the plan, implement it, especially the 25 a day limit.
170. Attached are my comments for the Draft New York Sunfish and Crappie Management Plan. I am hoping you will take the time review and consider some of the issues that are being raised here. The Bureau of Fisheries is utilizing deeply flawed strategies to manage New York panfish populations. The Bureau is clinging to antiquated principles of subjective anecdotal management based on "best professional judgment" in areas where they are directly responsible for collecting comprehensive and valid biological, harvest, and human dimension information for the purpose of managing fisheries resources. Harvest restrictions reduce access to fisheries resources so they should be applied judiciously and used as tools to achieve specific outcomes, and not be used as social or values statements. Using regulations as social or values statements compromises department objectivity because not all angler groups may share the same values and this creates the perception that the department is partial to one group over others, creating mistrust between anglers and managers. Monitoring efforts provide data to detect changes across space and time and provide the parameters for modeling simulations that allow fisheries managers to identify the likelihood of specific outcomes, the tradeoffs needed to get there, and under what conditions those tradeoffs can be minimized. This approach allows a structured and transparent decision-making framework, maintains realistic expectations, and builds trust between anglers and managers. The tenants of the proposed plan are not befitting of fisheries professionals because they rely on a "trust us, we know better" approach with no quantitative evidence to support their decisions. This generates unacceptable risk in producing undesirable outcomes for New York's fisheries resources. My hope is that the bureau will focus and refine their data collection efforts and use scientifically validated methods for evaluating and managing sportfish resources. This is the best way they can serve New York anglers. Thank you for your time and please feel free to contact me if you have any questions.

Natural resource managers are entrusted with the management of natural resources for the benefit of the public. Fisheries managers use a core set of tools, including stocking, season, size, and bag limits, to accomplish that mission. Fisheries managers collect biological information to monitor population trends through time, provide context to annual population performance, and understand the effects that regulate population density, growth and size structure which directly impact resource users (anglers). Fishing regulations can have direct effects on shaping fish populations and directly impact angler satisfaction. Managers use biological, creel, and human dimensions

information to identify satisfactory population characteristics for different angler groups, which waterbodies can provide those population characteristics (e.g. high density vs. large size), and if those population characteristics can be optimized with the available management tools (stocking, season, size and bag limits). The proposed Draft New York Sunfish and Crappie Management Plan and proposed regulatory changes do not follow any convention of typical, sound, scientific, and competent fisheries management. It uses an invalid opinion survey, an insufficient literature review which is compounded by suspect interpretation of the conclusions of the few papers cited, and entirely subjective biological and fishery anecdotes to justify misguided regulation changes that are meant to reflect fabricated values and concerns of New York anglers.

Loukmas et al. (2020) claim a change in angler values as the impetus for the “needed” regulation changes and present Loukmas (2020) as evidence for that. Loukmas (2020) details the results of an online internet poll of a DEC newsletter subscription list that asked a series of six questions about participation and preferences relating to angling for sunfish. Human dimensions play a key role in natural resources management. In fisheries management, angler preferences provide direction for resource goals and outcomes within biological constraints. Identifying angler preferences and measuring satisfaction plays an important role in the management process and measuring those angler metrics is done through opinion surveys. Specific requirements must be met for valid opinion survey design (see Vaske 2008 and Dillman et al. 2014) because of the known bias that occurs in opinion surveys. Unlike other test subjects, humans have a choice to participate in attempts to measure them. Ensuring that data collected on a population reflects the true value for that population requires the investigator to 1) establish a sample frame for all individuals in a given population (in this case all NY freshwater license holders), 2) randomly sample within that sample frame to collect responses, 3) achieve an adequate response rate using best practice survey administration, 4) compare sample demographics to known population demographics (e.g. age, gender, residence), and 5) correct observed deviations in sample characteristics using posthoc weights (Dillman et al. 2014). Loukmas (2020) fails to meet any of these criteria for valid survey design. Loukmas (2020) fails to establish any statistical relationship between the newsletter subscriber list and the intended sampling frame which is all New York freshwater license holders (criteria 1). Loukmas (2020) attempt (but fail) to establish validity of their survey design by claiming a high response rate (1,416 completed surveys). However, when viewed in the context of the true sample frame which is all NY freshwater license holders (900,000 plus annually) the response rate is 0.15%, which is grossly inadequate to draw any valid conclusions (criteria 3). Loukmas (2020) utilized an exclusively web based, self-selection design which is not random (criteria 2), has been shown to be biased, and not reflect the true opinion distribution of a population. Bethlehem (2010) and Wallen et al. (2016) provide real examples of how specific demographics are underrepresented in self-selected, web-based survey designs. Criteria 4 and 5 were not even attempted. Attempting to identify angler preferences and satisfaction with known faulty survey designs is irresponsible and can lead to unrealistic expectations, and low angler satisfaction. Using opinion surveys instead of real biological information to diagnose and evaluate resource performance (e.g. Objectives 1-3) can lead to poor resource outcomes. Loukmas (2020) should not be used in any manner to identify angler preferences or satisfaction, be considered when determining policy and resource goals and objectives, or be used as

justification to change or select regulations. However, based on the tenants of this plan it is being used in all of these capacities.

The authors attempt to justify the regulation changes with a review of "the current science on impacts of harvest restrictions on both crappie and sunfish fisheries".

Loukmas et al. (2020) cite Jacobson (2005), Rypel (2015), and Paukert et al. (2002) as evidence of increased size structure as a result of decreased bag limits and increased minimum length limits in bluegill populations. Jacobson (2005) utilized a before-after-control-impact study design to determine the impact of reduced bag limits on bluegill size structure. Jacobson (2005) specifically stated their results were somewhat ambiguous as other factors such as growth, mortality and recruitment can have overriding effects on bag limits. Jacobson (2005) specifically contend that while bag limit reductions can improve size structure, specific conditions need to be met in order for those regulations to be successful, and that the realized reduction in harvest for potentially marginal gains in size structure may not be an acceptable tradeoff to anglers. Despite the limited scope (only small lakes) and cautious conclusions of Jacobson (2005), Loukmas et al. (2020) presented this paper as strong evidence that their proposed regulations would yield bigger fish for New York anglers on a statewide scale. Paukert et al. (2002) utilized real angler harvest and effort data (not anecdotes) and real bluegill population data (not anecdotes) and a modelling approach (not anecdotes in table form) to simulate the effects of bag limit reductions and increases in minimum length limits on yield and population size structure (an approach that should be expected as the minimum effort required for a natural resource management agency like DEC to justify a regulation change). Paukert et al. (2002) found that a 200 mm size limit would increase RSD-P an average of 2.2 percentage points across all 18 study lakes when exploitation was less than 10% and total annual mortality averaged 40%. In order to achieve that minimal change in size structure the number harvested would decline 62% and yield would decline 39%. Conditions that would improve size structure without significantly compromising yield required fast growth (bluegills would have to reach 200 mm in 4.2 years), low natural mortality and an exploitation rate of 30% or more. Further, Loukmas et al. (2020) have no evidence that any of the lakes in New York meet the narrow range of conditions detailed in Paukert et al. (2002) that are needed to improve size structure and create the outcomes suggested by Loukmas et al. (2020) in objectives 1 and 3. Rypel (2015) follows the same pattern, equivocal results, and realistically modest gains with other factors (productivity in this case) playing a major role in the response. Here is a direct quote from Rypel (2015) "However, the gains in size produced by reduced daily limits were variable and, in many cases, could be considered relatively modest. Variation in the efficacy of the reduced limits was correlated with the duration of the regulation change and mean lake Secchi depth."

Misleading interpretations continue with the justifications for crappie regulations.

Loukmas et al. (2020) specifically cite Isermann et al. (2002) as evidence that a 10-inch size limit will increase the number of 12-inch crappie. However, Loukmas et al. (2020) fail to meet the criteria prescribed by Isermann et al. (2002) for fast growth (254 mm before age 3), low conditional natural mortality (close to 30%), and a massive sacrifice in yield (>50% in the number harvested) in order to accomplish that change in size structure. Not only that but Isermann et al. (2002) specifically recommended a 229 mm minimum length limit (the current NY crappie minimum length limit) as reasonable to balance the loss in yield for gains in size: "In all scenarios, a 229-mm limit, compared with no size limit, provided similar or higher yields than the current 254-mm limit,

produced less severe declines in the average number of crappies harvested, and increased the number of crappies reaching 300 mm." Despite this statement in the paper they cited, and having no information on growth or mortality in New York lakes, Loukmas et al. (2020) are proposing a statewide 254-mm minimum length limit for crappie. Mosel et al. (2015) modeled the effects of reductions in bag limit and minimum length limits and found that in order to effectively reduce harvest of crappie by at least 25%, bag limits would need to be ≤ 10 fish/d and MLL would need to be ≥ 229 mm, which is similar to what Loukmas et al. (2020) is proposing for their special regulation lakes. Mosel et al. (2015) expanded further to say that such severe reductions in bag limits were generally unacceptable to anglers. Had Loukmas et al. (2020) done a more thorough literature review, they would have discovered additional papers that found the effectiveness of minimum length limits was highly context dependent (e.g. lake size $> 2,471$ acres, productivity $> 50 \mu\text{g/L}$, natural mortality $< 30\%$, time to reach 254 mm < 3 years, see Pritt et al 2019, Isermann et al. 2002, Hale et al. 1999, Maceina et al. 1998), and when those conditions were not met, harvest restrictions were ineffective in producing increases in yield or size structure. In addition to the context-dependent response of panfish populations to regulations which was a key finding in all of these references, another central theme that seems to have eluded Loukmas et al. (2020) was that all of these state natural resource agencies went out and collected biological population information to perform these modeling simulations and pilot tests in their efforts to identify when and where regulations were appropriate, something this plan is glaringly missing. It is unclear if Loukmas et al. (2020) were intentionally attempting to mislead anglers by omitting the context and findings of the papers they were citing or simply did not understand what they were reading. The inferences being made by Loukmas et al. (2020) that the proposed changes in bag limits and minimum size limits will improve sunfish and crappie size structure and angler satisfaction across the state are not supported by their chosen references or other papers they did not consider.

Loukmas et al. (2020) acknowledges that panfish have received little attention from the agency in regard to monitoring efforts or regulation evaluation, a fundamental failure in the role of a fisheries management agency. They present population evaluation criteria in Objective 3 without even considering the possibility that those populations could already be meeting those criteria under current regulations and then preclude the need for the proposed regulation changes. It would be premature to even start discussing if those were realistic criteria with the admitted lack of biological population information needed to make that determination. Rather than correcting past mistakes by implementing a plan to methodically monitor panfish populations across the state, estimate population metrics, and evaluate panfish resource performance (a critical responsibility of a fisheries management agency), Loukmas et al. (2020) present a table of anecdotes as if it were an acceptable diagnostic tool for fisheries professionals. The table consists of an "analysis" of lake size, "high use" which is presumed to be a surrogate for effort, "large fish" a presumed surrogate for size structure, "fast growth", and "productivity". The columns for each lake are populated with "y", "n", "avg", or "unk" options. No quantitative criteria for those descriptors are provided because the appropriate biological information had not been collected and those metrics had not been estimated. It is unclear which combinations of "y", "n", "avg", and "unk" were needed to qualify for the special regulations detailed in Objective 3. This represents DEC's best effort at diagnosing and evaluating valuable sportfish resources, and Loukmas et al. (2020) felt after that evaluation that the prudent course of action was to

overhaul panfish regulations on a statewide scale. Further, they present “Alchemer” internet polls of angler satisfaction as their primary diagnostic tool for evaluating program performance across all 3 objectives. Biological considerations were clearly not important in developing this plan since no evaluations of density, size structure, growth, mortality or recruitment were attempted. Implicitly based on the tenants of Loukmas et al. (2020) they have precluded the need for population surveys since anecdotes and an internet poll were the primary tools used in development of this plan and internet polls were the only real commitment for evaluation of the statewide regulatory changes. It seems the biologists and technicians they have on staff no longer serve a purpose. Without purpose, they should be laid off and those cost savings should be refunded to the anglers that have paid for them because they are not currently receiving the value for the money they have been investing with DEC through license sales and excise taxes on fishing equipment and marine fuel.

Loukmas et al. (2020) demonstrate a critical lack of understanding in the role of population monitoring in the fisheries management process. As part of their role, fisheries managers monitor the biological characteristics of sportfish populations. Biologists collect quantitative population information on abundance, size, and age structure from managed fish populations. Biologists also collect creel information which provides estimates of effort and harvest. These metrics allow the estimation of the dynamic rate population functions: growth, recruitment, and mortality. Managers also collect corresponding information on waterbody characteristics such as waterbody size, morphometry, and productivity as those physical characteristics have direct effects on sportfish populations. All this information allows managers to monitor population trends through time, provide context to annual population performance through space and time, and understand the effects that regulate population density, growth and size structure which directly impact resource users (anglers). Instead of using established scientific methods to monitor fish populations, evaluate performance and optimize fish production to meet angler preferences, Loukmas et al. (2020) utilized invalid opinion survey designs, fabricated angler values, and anecdotes to determine resource goals, evaluation, and angler satisfaction. This type of low-grade work is unacceptable from any natural resource management agency, yet it is being used to set policy and justify regulation changes which directly impact angler groups. The lack of biological considerations maximizes the risk of unrealistic angler expectations, low satisfaction, and poor resource outcomes (Johnson and Martinez 1995, Radomski and Goeman 1996).

Loukmas et al. (2020) claim a scientific approach for their panfish management plan but fail to meet any of the criteria for scientific management of fisheries resources. My recommendation is to start with a comprehensive monitoring strategy with appropriate coverage through space (lakes) and time (years) and statistical power to measure biological characteristics (Miranda and Boxrucker 2009, Bonar and Hubert 2002, Bonar et al. 2009), creel surveys to estimate angler effort and harvest (Jones and Pollock 2012), and valid opinion surveys to understand angler preferences and measure satisfaction (Wallen et al. 2016, Vaske 2008). Using real information (not anecdotes) provided by these survey efforts, DEC could evaluate panfish populations, set biologically realistic resource goals, direct anglers to waterbodies that fit their preferences, and utilize harvest regulations to optimize production within biological constraints through a modeling and adaptive management approach.

References

- Bethlehem, J. 2010. Selection bias in web surveys. *International Statistical Review*, 78(2), 161-188.
- Bonar, S. A., and W. A. Hubert. 2002. Standard sampling of inland fish: benefits, challenges, and a call for action. *Fisheries* 27:10–16.
- Bonar, S. A., S. Contreras-Balderas, and A.C. Iles. 2009. An introduction to standardized sampling. Pages 1–12 in S. A. Bonar, W. A. Hubert, and D. W. Willis, editors. *Standard methods for sampling North American freshwater fishes*. American Fisheries Society, Bethesda, Maryland.
- Dillman, Don A., Jolene D. Smyth, Leah Melani Christian. 2014. *Internet, Phone, Mail, and Mixed-Mode Surveys: The Tailored Design Method*, 4th Edition. Wiley Publishing.
- Johnson, Brett M. and Patrick J. Martinez. 1995. Selecting harvest regulations for recreational fisheries: opportunities for research/management cooperation. *Fisheries* 20:22-29.
- Jones, C. M. and K. H. Pollock. 2012. Recreational angler survey methods: estimation of effort, harvest, and released catch. Pages 883–919 in A. V. Zale, D. L. Parrish, and T. M. Sutton, editors. *Fisheries techniques*, 3rd edition. American Fisheries Society, Bethesda, Maryland.
- Hale, Scott R., Marty E. Lundquist, Randy L. Miller, and Raymond W. Petering. 1999. Evaluation of a 254-mm Minimum Length Limit on Crappies in Delaware Reservoir, Ohio. *North American Journal of Fisheries Management* 19:804-815.
- Isermann, D.A., S.M. Sammons, P.W. Bettoli, and T.N. Churchill. 2002. Predictive evaluation of size restrictions as management strategies for Tennessee reservoir crappie fisheries. *North American Journal of Fisheries Management* 22:1349-1357.
- Loukmas, Jeff. 2020. New York sunfish angler survey. New York State Department of Environmental Conservation, Bureau of Fisheries, Albany, New York.
- Loukmas et al. 2020. Draft New York Sunfish and Crappie Management Plan 2021-2028. New York State Department of Environmental Conservation, Bureau of Fisheries.
- Miranda, L. E., and J. Boxrucker. 2009. Warmwater fish in large standing waters. Pages 29–42 in S. A. Bonar, W. A. Hubert, and D. W. Willis, editors. *Standard methods for sampling North American freshwater fishes*. American Fisheries Society, Bethesda, Maryland.
- Mosel, K. J., D. A. Isermann, and J. F. Hansen. 2015. Evaluation of daily creel and minimum length limits for black crappie and yellow perch in Wisconsin. *North American Journal of Fisheries Management* 35:1-13
- Pritt, Jeremy J., Joseph D. Conroy, Kevin S. Page, Stephen M. Tyszko, Richard D. Zwiefel. 2019. Standard Assessments Reveal Context-Dependent Responses of Crappie Populations to a Length-Based Regulation in Ohio Reservoirs. *North American Journal of Fisheries Management* 39:999-1014.
- Radomski, Paul J. and Timothy J. Goeman. 1996. Decision Making and Modeling in Freshwater Sport-fisheries Management. *Fisheries* 12:14-21.
- Vaske, Jerry J. 2008. *Survey Research and Analysis: Applications in Parks, Recreation, and Human Dimensions*. Venture Publishing Inc.
- Wallen, Kenneth E., Adam C. Landon, Gerard T. Kyle, Michael A. Schuett, Jeremy Leitz, and Ken Kurzawski. 2016. Mode Effect and Response Rate Issues in Mixed-Mode Survey Research: Implications for Recreational Fisheries Management, *North American Journal of Fisheries Management*, 36:4, 852-863

171. Sorry, but the more I think about this big panfish initiative, the more ludicrous it sounds. Please, no size limit on otisco. 25 fish per day is fine though. Maybe a better place to start is to talk to the otisco water preservation group. Every year they rent out mats that are placed on the bottom of the lake to snuff out the Eurasian milfoil in front of peoples docks. Last year I saw first hand the placement of one of these mats over a

large number of bluegill spawning beds. More than weeds were snuffed out. No common sense what so ever.

172. On behalf of the state Fish and Wildlife Management Board we offer the following comments and observations on the recently released Draft New York Sunfish and Crappie Management Plan (the Plan): FWMB recognizes that sunfish, other panfishes, as well as both black and white crappie, are self-sustaining fisheries. In that light it is important to recognize their vulnerabilities and therefore, reducing the daily limit for sunfish to 25 fish per day and placing a minimum size limit of 10 inches for black crappie, FWMB believes are prudent management actions to maintain a sustainable fishery. Many of the smaller water bodies across the state are suffering under the effects of evolving climatic conditions, and eroding habitat, issues that that are not directly addressed in the Plan, perhaps because there is no clear, universal remedy. Any management plan – especially any plan that extends beyond a few years - must have an expressed element of adaptability. Hopefully, as habitat and climatic conditions warrant, we suggest that the Department – via the Plan – provides the opportunity to address emerging concerns. We believe that the Plan should address the intent to provide “adaptability” so as to avoid future criticism that the Plan is not being followed when actions are taken to avoid impending damage. The Board’s view is that the Plan does not adequately address the issue of invasive species. Various invasives are ubiquitous to waterways and waterbodies across the state, and the list is in a constant state of flux as new species find their way here. Many stakeholders lack a real understanding or appreciation of the short-, and long-range impact that invasives – along with climate and habitat - have on native fish populations. The Board believes that the Plan needs an education component, even if it is delivered as a part of the broader impacts those issues will have on the state’s biota. The Board notes that there were four (4) meetings held during the period that the Plan was being developed. Our candid observation is that there might have been some benefit to having a meeting with representatives of the Regional FWMBs or the Executive Committee of the state FWMB during that same period, to hear their perspectives on what they might expect to see in this Plan. Our broad view is that the first two objectives of the Plan are rather straight forward.
- Objective 1:** acknowledges that the current daily creel limit for sunfish could be counter-productive to the sustainability of the fishery. Reducing the daily creel limit and periodic evaluation of the impact will not doubt protect the resource, if the Department stays with the plan and adopts any necessary changes. Our expectation is that the Plan will be adaptable. That is, information and data gleaned from the periodic evaluations will be used to adjust the Plan if and when necessary.
- Objective 2:** periodic evaluations of the 25 fish per day creel limit for black crappie and increased minimum size should be conducted However, the Plan does not stipulate the frequency or intensity of angler and fish population surveys that will be employed to evaluate the impact that the plan has on the state-wide fishery. Understanding that year-to-year resources for such work is problematic, articulations the information in the plan might help with long-range work and budget plans. We also suggest that the Department assess the wisdom and necessity of continuing with a commercial fishery (targeting panfish), especially in those waters included in the BPI initiative. We also would like to see an exemption for children who do not need to be licensed to fish. That clearly is a recruitment issue – asking a child to release the few fish he or she may catch would seem to be counter-productive to that effort. Obviously, the biggest step forward in the Plan is the implementation of the Big Panfish Initiative (BPI). Creating a (memorable) self-sustaining fishery that does not compete with hatchery resources is prudent given the fiscal issues and budgetary constraints that the Department is faced with perennially.

However, again, we missed an important opportunity by not including our statutory Boards in the development of the Plan. The Boards do not know how the BPI-included waterbodies made it to the list. Without an understanding of the criteria applied it is virtually impossible to know how or why any particular waters were excluded. In sum, this Plan is long overdue. Any of this state's natural resources that are used for recreational purposes and that are supported by license fee revenues need to have Plan available to measure the impacts on their use and to evaluate proposed changes. We look forward to reviewing the PUBLIC COMMENTS before any regulatory and/or legislative changes are promulgated.

173. I am an avid fisherman in NYS. I live in Watertown NY and fish in Region 6 mostly. I fish in the Indian River chain of lakes, mostly Hyde Lake, Butterfield for crappie. In the last several years I have had a hard time getting my limit of 9" fish not talk about 10" fish. I am 67 years old it would take a while to get the population to 10". I think the limit of sunfish to 25 is fair there are a lot of fisherman that are abusive to the population. I went to Black Lake last fall we caught a hundred 8" fish and three of us all together had 20 nine inch fish. I don't think the 12" minimum is a good idea.
174. I want to chime in and say I agree with the proposals of increasing the legal length of bluegills to 8" with a limit of 15 and the 12" 10 fish limit for crappie. I enjoy fishing for panfish especially through the ice, and would like to see the resource helped out with the new rules. I think the old limits are abusive to the fishery, with our modern techniques and electronics. Especially the fish finders, which give fishermen an unfair advantage. Having limits of 15 and 10 for bluegills and crappies will make it a bit harder for fishermen to come off the ice with large numbers of fish they intend to sell. Which happens more often than one might think. I'd like to see perch given more protection also as they are a target fish to sell also. Probably more so than bluegills and crappies.
175. Just a few lines your way. About sunfish and crappie changes. New daily limits and size. I like to fish and hunt. I fish Silver Lake a lot, most of the times I get my limit and I like to take my kids too. And if you change the limit and size I don't know if I just have to stop fishing because I couldn't bring enough fish home for my family for just one meal. So you'd be looking for fewer fishermen. I like to fish for sport but bring home enough for a meal. Got a big family and if I don't fish are the kids going to fish? Will it be just for sport people? Please please don't. Thanks for hearing. I still need to protect my family and I know there are a lot more people that don't like to hear that.
176. I agree reducing the sunfish statewide daily harvest limit from 50 to 25. I agree increasing the crappie statewide minimum size limit from nine to 10 inches. Also, I agree having an 8 in size minimum and a limit of 15 sunfish for Honeoye Lake. Also I agree having a 12 in crappie minimum on Honeoye Lake and the other lakes you listed. And a limit of 10 crappies. Also it would be nice to have a waterproof sign put up on the lakes of the fish regulations (size, limits, etc.).
177. As an avid fisherman and retired DEC fisheries biologist, I am writing with my thoughts regarding your draft "Sunfish and Crappie Management Plan". I believe that the current creel limits for panfish (sunfish, crappie and yellow perch) are way too generous as well as detrimental to productive fish populations and as such should definitely be reduced to 15 per licensed angler for all three species of pan fishes. The proposed statewide creel limit of 25 for sunfish is a welcomed step in the right direction. I regularly fish Honeoye Lake and vigorously support the proposal to implement a 15 per angler

creel limit as well as an 8 inch size limit for sunfish and would like to see these regulations applied statewide. The only exception to this type of regulation may pertain to small private bodies of waters, like farm ponds, where undersized sunfish are overpopulated/stunted and in need of thinning. Current regulations state that fish that are saleable at any time include those species in the "Statewide Angling Regulations Table" where there is no closed season and no minimum length, which would include sunfish and yellow perch. I am opposed to the sale of any of our freshwater fish species and would support a regulation that would eliminate the commercialization of all our natural resources. Under the current regulation structure this could be accomplished by implementing a statewide size limit on sunfish and yellow perch. I support the proposal to increase the statewide size limit of crappie to 10 inches. The proposal to implement a 12 inch size limit on special regulation lake crappie might be a little aggressive, but I support it in conjunction with a 10 fish creel limit. I would like nothing more than to fish a lake full of 12 inch and larger crappie.

178. I have reviewed DEC's proposed regulation changes for panfish and the plans for future management. These proposals are long overdue in my opinion and are more in line with most other states (Especially ice belt states) which have improved their fisheries with stricter catch and size limits, lake specific management, slot limits, and outlawing the sale of freshwater fish caught in their waters. I was thrilled to see that NYSDEC has finally begun a process to enact what I consider more sensible and more conservation minded policies relating to the angler harvest of these panfish species. I've hoped for this for years. I am 68 years old and have fished since a young boy. Needless to say over those years I have witnessed the tremendous changes that have occurred in the sport of fishing, especially over the last 25 years. All these have served to increase the effectiveness of anglers in catching all species of fish (i.e., boats, fish finders, rods and reels, lures, clothing, ice fishing shelters and overall fishing knowledge to name a few). Finally, there is the internet which has allowed anglers to share techniques, locations and same day reports of their success including pictures/videos. All these things have made anglers more efficient and effective. However, while these have enhanced the anglers' success they have occurred with a finite number of bodies to fish coupled with catch limits that NYS are far too liberal in my opinion. I am primarily a bass fisherman during spring, summer and fall with only occasional efforts devoted to fishing for walleyes and various panfish species. I have also pursued tiger muskies and since 2017 have spent considerable time fishing for carp which has help satisfy my urge to catch truly big fish. Carp fishing is a sport more people should consider though there is quite a steep learning curve to be consistently successful at it. However, in the winter I am a passionate ice fisherman and have made a significant investment in all necessary gear and tackle. It is during the ice season that I concentrate on fishing for panfish and so do the majority of other anglers. It is also at that time of year that I feel the hervest of these fish (sunfish and crappie) has increased tremendously over the years as the equipment has improved. The result: panfish populations have been hammered. Breeding size fish that years ago would have survived the winters, grown to the age for future spawns are being removed from the systems. The overall population and the number of trophy size fish are being depleted. One of the depressing things I have witnessed in recent years is the impact that commercial fishermen have had on my local waters where I live in Madison County. Tuscarora and Eaton Brook reservoirs are nearby and both waters have suffered the negative effects of a group of people who start at early ice and fish all day, every day in the shallow bays to catch their limits (or more) of bluegill for sale to fish buyers. I've heard these buyers are located somewhere in Oswego County. Where ever they are, there is a thriving market and these "sportsmen"

can sell as many as they can take from these small reservoirs. I've heard that the buyers want only sunfish 7 inches and above so obviously these people are targeting the very fish that are needed to spawn and sustain the population. Needless to say, the effect of their efforts has decimated the populations in both places. I suspect they will soon be scouting for other lakes to rape now that the production of salable fish in these places has declined to a point where their profits have also declined. Although I would love to see the selling of panfish in NY banned, I realize that past efforts to do this have been scuttled by north country legislators and probably won't be successful in the foreseeable future. However, the DEC proposals for more reasonable panfish regulations will help depress this practice. It will also limit the ability of anglers determined to use the liberal limits now in place to "fill their freezers" (for future burned fillets) and/or post pictures of their limit catches on the internet to satisfy their egos. So that is my angler input. I hope these draft proposals are ultimately adopted and commend DEC for addressing what is clearly a serious problem for the future of NYS fisheries.

179. I find it interesting that as usual in New York State the first thing that DEC does is to cut limits and put in a length requirement. As a person who has fished for nearly 70 years I have experienced many changes in regs and the overall fishing. When I was 9 years old I could tell you off the top of my head all the fishing seasons, size and limits in the DEC pamphlet. Today it takes a lawyer to understand all the rules. As far as the fishing I have witnessed ice fishing evolve from tip ups and hand poles with bobbers to high tech electronics. Ultra light jigging rods and many neat artificial baits. Crappie fishing has evolved from a summer fish (my family called them strawberry bass because you didn't fish for them until the strawberries were ripe) to a 12 month highly sought after fish. There was no limit or size so as you know there was a good toll taken as they were also a very valuable market fish. Since the regs were put in I have seen drastic changes in many waters. For a few years the population in some waters exploded with the size decreasing and to overpopulation and with the taking of only large fish there was a very good chance of eliminating the desirable large fish to reproduce. A farmer doesn't butcher his prime animals, he saves them for breeding. At the same times the 9" size limits made many ponds a sport fishery as there is almost no 9" fish in the water. (have caught hundreds without catching a legal size fish). I personally target crappies at times when ice fishing and fish for them 30 plus days a year during spring and summer keeping only a few during the winter if somebody else wants them as personally my family thinks they taste like crap. For this reason I don't really care about limits and size. By the way, my best black crappie is 17" Oswego River and 17" white crappie South Bay Lake Champlain. However, too many new regulations will alter plans as it might make it financially not a good choice to spend the time and money to fish, catch fish and not be able to even have a meal. Enough said about crappie, I want to get to my part of the reg proposal: Panfish. I live in Fulton NY which puts me in range of probably the best fishing in New York State. For the most part I fish mostly for gills and sunnies through the ice and target mostly Big Bay, Oneida Lake, Oswego River, Owasco Lake, Cayuga Lake, Sandy Point, Sixtown Pond, Red Lake and Lake of the Isles Goose Bay and the rest of the Indian River Chain. I feel that the 50 fish limit has helped maintain stable fishery in the bodies of water where it is enforced and I am afraid if a 25 fish limit is enacted people would keep only large fish and leave a possible population that may be genetically inferior. I feel that a season that allows the fish to spawn unmolested would be a better alternative as they are such an easy target when they are on their beds. As mentioned I fish Sixtown Pond and Occasionally Red Lake. Having fished Sixtown Pond successfully for many years I never saw any change in the fishing until 1 winter, there were no panfish at all on the north end. I mean 0 panfish, just small

perch. The panfish were very scarce the following years with this winter being the first time I have caught multiple fish with 5 being over 7" not the 8" plus like were caught in the past. This could not have been caused by overfishing. I guess my point is that limits and sizes should remain the same except in regard to crappies many lakes and ponds should have no size rule. As I have rambled on enough for now I hope you read this letter, think about what a person have lived and observed over a lifetime of experience. As the old timers told me for years I would catch a pail almost every time I went out. Back then a pail was a 10 qt metal bucket, not a 20 qt – 28 qt plastic pail. PS. Better enforcement especially on recent immigrants would help.

180. Read your posting on sunfish and crappie. I was wondering if you or the state will be offering these two species to stock farm ponds. My brother has 2 one acre ponds that he would like to stock. Will there be any available for this situation?