Steve AveLallemant was listed as the contact for public responses to the Draft Stocking Strategy for the WWI which was posted on the WDNR website with a deadline of 01/31/14. Following is a summary of comments received; all via email.

Three respondents indicated satisfaction that our draft policy gave some priority points to lakes for which lake groups are currently purchasing large walleye fingerlings for stocking. They did not suggest any changes however to the proposed language. All of these respondents represented Potato Lake (Rusk Co) and also suggested it should be stocked specifically under the WWI.
Response: Potato Lake is on the list of proposed waters for stocking large fingerling walleyes

One respondent indicated that we should give preference to lakes in which walleyes were once naturally reproducing but no longer are while at the same time largemouth bass populations have increased dramatically.
Response: We are doing this in a systematic way and have placed a high priority on stocking lakes which once had naturally reproducing walleye populations.

Most of the responses I received were requests that specific lakes be stocked with large fingerling walleyes as follows

**Single Response**
Barker Lake (Sawyer Co); Wisconsin River (Portage Co); Rollingstone Lake (Langlade Co); Solberg Lake (Price Co); Manitowish Chain, Big Sand Lake, Pickerel Lake (Vilas Co); Sevenmile Lake (Oneida Co); Lake of the Pines (Rusk Co); Whitewater Lake (Walworth Co); Lake Winnebago

**Three Responses**
Chalk Hills Flowage (Menominee River)

**Seven Responses**
Potato Lake (Rusk Co)
Response: Of these lakes, the Wisconsin River, Manitowish Chain and Lake Winnebago are not on the proposed list of lakes for stocking and should not be due to strong natural reproduction already.
Barker is currently considered a naturally reproducing lake although recent recruitment has declined. It will be re-evaluated for stocking in the future.Rollingstone and Big Sand lakes are not on the proposed list of lakes for stocking as they contain strong fisheries for other species and their habitat and fish communities indicate that stocking success may be very low. The other lakes are currently on the proposed list of lakes for stocking

The Wisconsin Aquaculture Association (WAA) submitted extensive comments (attached below). One individual private fish producer also submitted comments which mirrored those of the WAA but added that priority should not be given to lakes with Tribal importance (enhancing a fishery with public dollars for a select group of people).
1) The first concern expressed by the WAA was that DNR’s genetic policy relative to stocking decisions was poorly understood by the industry.

Response: This concern was addressed in detail in the DNR response to this issue in a report to the Wisconsin Legislature, “Wisconsin Walleye Initiative Regulatory Review and Recommendations Study; November 15, 2013, as follows. Note that the genetic workshop referenced in the report is to be held on March 6, 2014, as part of the WAA annual conference.

“Agency Response:
Stocking the proper genetic strain is extremely important to protect the long term health of the fishery in the stocked waters. There are situations where genetic strain is not an issue, but in most Wisconsin stockings – particularly in waters with drainage connections to river systems or other waters – we try to use a genetic strain that is reasonably similar to the native fish. The statewide policy has been evolving since major statewide surveys of fish genetics were completed in the late 1990s. The overall policy was documented in a publicly available reports in 1999 (http://dnr.wi.gov/topic/fishing/documents/publications/stockrep.pdf) and 2010 (http://dnr.wi.gov/topic/fishing/documents/publications/StockingstrategyreportSeptember2010.pdf) and is implemented on a water specific basis by the local fisheries biologist through stocking quota Requests and reviews of private stocking permits. The policy applies to all species (including bluegills) and supersedes any policies that might have driven previous stocking decisions. Effects of stockings on the genetic integrity of a population are likely to have a cumulative effect over time, so repeating past mistakes only compounds the problem.

Because of the importance of the genetic policy to maintaining Wisconsin’s fisheries, DNR needs to work more closely with other producers to make available the brood sources needed to produce the correct genetic strains. Being able to sell at cost walleye eggs, fry or fingerlings as newly authorized in the FY13-15 budget bill, should allow us to eliminate this as a constraint for walleye producers. If this proves successful, we recommend that the Legislature extend this authorization for other species.

DNR also recommends working with WAA to hold a genetics workshop for producers. That would help everyone better understand the policies and jointly develop ways to fully meet Wisconsin’s stocking needs with the proper genetic strains.”

2) Several of the WAA concerns were related to the industry obtaining the necessary genetic “stocks” to meet requirements and how those stocks are/should be defined. As acknowledged by the industry the newly authorized ability for DNR to provide walleye eggs/fry to producers would alleviate many of those concerns but they also were concerned about development of their own broodstock (fish held in captivity for breeding) of those “stocks”.

Response: The Wisconsin DNR currently recognizes 5 genetic “stocks” of walleye in Wisconsin. These stocks were identified based on sampling of naturally reproducing
walleye populations statewide for genetic stock characterization. This work was conducted by geneticists at UW Stevens Point. In brief, the stocks were described based on groupings of individual genetic characteristics at several levels of detail. Nearly all populations were unique at some level which suggests that past stocking practices, while potentially having altered some genetic characteristics, have not “homogenized” populations. But some grouped together based on shared characteristics. Groupings could be made at many levels but the five selected were judged to best represent related populations at a level sufficient to be considered a “stock”.

While the ideal situation would be to maintain all 5 stocks for propagation purposes, DNR currently manages three stocks in its propagation system; Mississippi Headwaters, Lake Michigan and Rock/Fox. Two of the genetically identified stocks have low demand for stocked walleye within those drainages. There is very little stocking demand for Mississippi Mainstem so those few quotas are assigned to the closely related to Mississippi Headwaters stock. It was also very difficult logistically to maintain a Lake Superior stock. After consultation with UWSP geneticists (Sloss, personal communication) these quotas were also assigned to the most closely related Mississippi Headwaters stock.

DNR believes that the three stocks it manages should be used by all producers when stocking any water where the objective is restoration of natural reproduction. Matching as closely as possible the successful natural stocks in the area will help maximize the likelihood of success. DNR also believes that all drainage lakes within the geographic stock boundaries should use the appropriate stock due to the likelihood of escapement and mixing with other populations. Seepage lakes (no inlet or outlet) may use the applicable stock.

As to development of these regional stocks as captive brood sources in hatcheries, DNR is not opposed but believes that the preferred alternative is taking spawn from wild populations on an annual basis using protocols that maintain appropriate levels of genetic diversity among fish produced for stocking. In most evaluations of survival post-stock- ing of “wild” versus “domestic” fish of many species the wild fish survive much better. DNR further recommends that an appropriate number of individuals, both male and female be “paired” in a systematic way to maintain the appropriate level of genetic diversity of a particular year’s production. This practice helps conserve within-population genetic diversity and reduces the problem of in-breeding both of which are important genetic conservation principles. Broodstock currently being held in captivity at non-DNR hatcheries could be genetically characterized using the same methods DNR used to delineate stocks to determine relatedness, and maintained according to a broodstock management plan that ensures appropriate levels of genetic diversity. Collection of eggs from the wild increases the biosecurity risks but DNR believes the practices it uses to collect eggs minimizes the potential to introduce diseases or aquatic invasive species.

3) WAA agreed with currently used DNR stocking rates but commented that annual stocking be permitted rather than the current alternate year stocking strategy.
Response: DNR will be conducting a production level evaluation of different stocking rates for large fingerling walleye. If DNR finds that higher stocking rates lead to better fishing, DNR plans to adjust stocking rates accordingly. DNR believes however that alternate year stocking is still a preferred strategy. It allows convenient and efficient evaluation of the contribution of natural reproduction in non-stocked years which is the ultimate goal of restoration efforts. There is also good scientific evidence that strong survival of young of year walleye in a particular year, a strong year class, will suppress survival of the subsequent year class. Alternate year stocking will prevent this from occurring.

4) WAA was concerned that stocking policy not prevent private sector purchase of walleyes from private producers for stocking lakes.
Response: DNR will continue to issue private stocking permits for lakes which are not stocked under the WWI but believes that the stocking strategy which applies to WWI lakes, including genetic stock requirements, should also apply to lakes stocked under a private stocking permit.

5) Finally WAA was concerned that more than biological priorities be considered in implementation of WWI stocking and other strategies aimed at improving walleye fishing.
Response: DNR agrees and has and will continue to incorporate social and economic considerations into decisions.
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Steve AveLallemant
Northern District Fisheries Supervisor
Wisconsin Department of Natural Resources
107 Sutliff Ave, Rhinelander, WI 54501

January 31, 2014

Re: Walleye Stocking Draft Guidance

Dear Mr. AveLallemant;

The Wisconsin Aquaculture Association (WAA) is responding to the Departments request for comments on the Walleye Stocking Draft Guidance. The WAA is the voice of the Wisconsin aquaculture industry, 100% industry led and producer centered to promote, educate and advocate for the economic viability and environmental sustainability of fish farming in Wisconsin. WAA views the Wisconsin Walleye Initiative (WWI) as a very positive public/private partnership which has the potential to greatly enhance the walleye fishery and increase rearing capacity in the state while providing economic growth for Wisconsin fish farmers. The following comments are made to help strengthen the walleye stocking guidance policy insuring that the complexities between private aquaculture, lake associations or species groups and department policy are understood and taken into consideration as we move forward in this new era of cooperation and partnerships. The Walleye Stocking Guidance needs to consider the role that the Department along with private aquaculture and tribal hatcheries play and how best to utilize the resources of each without infringing on the economic stability of private aquaculture. The Stocking Strategy must consider the historic stocking in water bodies as it pertains to genetics, what direction the department wants to head and the steps necessary to achieve goals.

1. The genetic policy in its current form is not fully understood by the private industry; the workshop on March 6th will be a good step toward fostering better communication if the department is open to discussion and includes input from the industry.

2. Denial of stocking permits due to the genetic policy can be a huge economic burden on the industry; providing eggs/fry to the industry will help, but establishment of new broodstock will take years to develop and the industry needs assurance that their biosecurity and invasive species HACCP plans are not compromised.

3. Some Wisconsin fish farms have worked for years to establish a “Wisconsin” strain of broodstock comprised of some or all of the three “stocks” the Department is recognizing; Lake Michigan, Rock River and Upper Mississippi. Under present policy fish from this combined strain could only be used in unspecified waters. WAA believes that historically many water bodies in Wisconsin have been stocked with a variety of strains. Going forward the Department wants to stock watersheds with fish containing these recognized genetic complements to conserve genetic diversity. Whether the genetic integrity of the brood stocks currently being used by the Department is retained (due to the impact of previous stocking activities) remains a question. WAA would like to know what methodology or qualitative measurements are being used to determine or identify these genetic characteristics in separating walleyes into the three “stocks”.

4. We further suggest that an analysis using the same type of genetic measurement be made available for privately held brood stocks and that the Department develop with the industry a policy of allowing stocking when reasonable or similar characteristics match the receiving waters; at least until such time that the industry can have time to develop broodstock of the three preferred stocks. This allowance and matching of similar genetic characteristics gives credit to those farms that have worked with fish that have originated from waters of the state, have complied with environmental concerns, health testing and contribute to the state’s economy.

5. WAA agrees with the Department stocking policy that recommends that 1,000 fry per acre, 35 June or small fingerlings per acre on alternate years and 10 fall or extended growth fingerlings per acre. We would propose that the fall or extended growth fingerlings be stocked every year instead of every other year if the walleyes are available.

6. Many lake associations purchase walleyes from the private sector and have been doing this for many years, which has helped develop a good quality walleye fishery. These groups should not be “penalized” for spending their time and money by denying stocking permits. This is an area that the Department needs to work with all concerned so the private industry does not loose long standing customers while assuring that the state, private and tribal resources are best served.

7. The stated purpose of WWI is to dramatically increase the number of walleye in Wisconsin by expanding production at state, private, and tribal fish hatcheries. That being said, the Walleye Stocking Guidance needs to take into consideration the economic and socioeconomic impacts to tourism areas and small business, besides just the biological priorities. The WWI can be a strong public/private partnership but all parties have a stake in the success or failure of the program. Bag limits and harvest quotes have a direct affect on the perception of the quality of the fishery, which in turn affects businesses. We must all work together to prevent negative perception from becoming reality.

WAA is excited to work with the Department on the WWI as a partner to help the state achieve its goals of making the most effective and efficient use of walleye efforts. We recognize the complexity of the program and that the Department is working in uncharted waters in respect to depending on partners to fulfill fishery needs. The WAA will strive to keep lines of communication open and ask that the Department recognize that the industry and tribal hatcheries have important expertise to offer while providing additional capacity and solutions in creating a better walleye fishery for the State of Wisconsin.

Sincerely,

Dan Gruendemann
Board Chairman
Wisconsin Aquaculture Association