

Erie Pennsylvania Sport Fishing Association

The EPSFA was formed to educate, enhance and protect the sport fishing in Pennsylvania, especially in Lake Erie, Presque Isle Bay and its tributaries.

August 23rd, 2021

Pennsylvania Fish & Boat Commission
1601 Elmerton Avenue
PO Box 6700
Harrisburg, PA 17106-7000

Re: Proposed **Lake Trout** Regulation Changes for Lake Erie

Dear Commissioners,

Regarding the proposed change to the **Lake Trout** creel limit from (2) to (1), we object to this proposed rule for the following reasons:

1. Lake Trout provide a desired charter fish during the period from late April to the end of May and again, late October into the fall period. This is important to the charter industry and the related economic spin off it provides. These fish provide excellent charter angling opportunities during non-traditional walleye fishing time periods and promotes fishing in Pennsylvania.
2. Most anglers and charter customers, who target Lake Trout do not harvest them, rather they provide a catch and release fishery for most. However, the few anglers who choose to harvest them should be allowed more than one. Reducing the creel limit to one fish from two fish would be detrimental to many of the charter businesses that do offer Lake Trout charters. Many charters have established Lake Trout customers who have been used to the two fish creel limit and it would be hard to sell Lake Trout charters in the future with a “one” fish limit. The charter industry will lose customers over this proposed regulation change and will be hard pressed to acquire new customers.
3. There has been no recorded naturally produced Lake Trout until recently. This fishery has been primarily a put, grow, and take (or release) fishery. We do not believe the small amount harvested at the rate of two per angler could harm the spawning stocks. More Lake Trout will probably perish by way of mishandling, improper releasing or when attacked by Lamprey Eels, than by anglers taking their two fish limits.
4. We do not agree with changing our Pennsylvania creel limits to “agree” with our New York State or Ohio neighbors. If that is the reasoning, then we should also change the minimum length to 12”, not 15”, and we would allow an open season year-round without a closed time period for all trout species. Also, NYS allows 3 combined trout and salmon species in addition to (1) Lake Trout. So, our NYS neighbors can harvest a higher combined limit than what is proposed.

https://www.dec.ny.gov/docs/fish_marine_pdf/fishguide.pdf

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Our neighboring State of Ohio allows a 12" size limit as well and a (5) combined harvest trout & salmon limit from May 16 to August 31st, then (2) combined limit the remainder. They do not differentiate between trout species, like NYS and PA.

<https://ohiodnr.gov/static/documents/wildlife/laws-regs-licenses/Ohio+Fishing+Regulations+21-22+ENGLISH.pdf>

If the PFBC changes to (3) trout and 15" per the other proposed Lake Erie regulation change, then we recommend a (3) fish "combined" trout limit, with a 15" minimum size for consistency. This will help the charter industry maintain or perhaps grow, allow the few anglers who do seek to harvest Lake Trout to capitalize on that and it offers a fair exchange to those groups or anglers who desire a reduction in steelhead/brown trout creel limits. It simplifies things to 15" for all trout/salmon and (3) combined species. Otherwise, it should stay at (2) fish with the proposed 15" size limit.

To conclude, we do not have an overharvest Lake Trout situation in Pennsylvania, nor will we hurt "potential" spawning stocks. Any lesser limits to the current limits will hurt businesses, lessen paying license holder's creel opportunities and we do not see why PA needs to be consistent with any bordering States regulations, we would not be anyways. At the annual L.E.C and G.L.F.C. meetings they state that Lake Erie will always have a Lake Trout restoration program. Currently, it is around 250,000 fish stocked per year, which is a generous amount placed in the Lake for anglers to harvest some benefit from-if they desire. As the Lake Erie Sports Fishing advisor to the State of Pennsylvania through the G.L.F.C., President of the Erie, PA Sports Fishing Association, member of L.E.A.C., member of L.E.P.M.A.G, member of the Pennsylvania Lake Erie Charter Captain Association, and a dedicated charter boat owner since 1988, I ask that you consider my request as the representative of the many anglers in the great angling State of Pennsylvania.

Sincerely,

Peter Alex III
President
Erie Pennsylvania Sports Fishing Association