October 3, 2025

Re: Fish and Game Commission meeting, Oct 8th, 2025 – Item 14 Recreational take of striped bass

Dear President Zavaleta, Vice President Murray, and members of the Fish and Game Commission:

On behalf of the Northern California Guides and Sportsmen's Association (NCGASA; petitioner) I am writing to provide our strong support to the proposed regulatory change petition to implement a slot length limit for the take (catch from recreational fishing) of Striped Bass.

NCGASA represents over 600 licensed guides and 3000 sportsmen and women. but some people behind me took the day off work to come speak to you about their Delta fishery. We are the conveners of the coalition supporting this fishery, including bait and tackle store owner, marinas, fishing associations, retailers, and more. We are asking that Commission do what is right for the fishery, and the true stakeholders - anglers who buy a fishing license and who care deeply about protecting ALL of our fisheries for future generations.

NCGASA has been collaborating with nearly every other angling organization in the state that cares about striped bass, both inland and in marine waters. Our organizations collectively represent the voice of California's recreational angling community, from charter boats in the estuary and ocean to inland guides, fly fishers, and others. Together, we represent the vision of the majority of California's recreational angler communities, whose fishing license revenue fund fishery-related research, and enforce regulatory protection of fish and wildlife.

The Fish and Game Commission (FGC) recently approved changes to California's 1996 Striped Bass policy which our collective organizations strenuously objected. In addition to removing numeric targets for one of California's most heavily sought-after recreational angling species (Striped Bass), the FGC further directed the Department of Fish and Wildlife (DFW) to deprioritize investment in Striped Bass population research because of their non-native status. This despite the fact that Striped Bass were introduced 146 years ago and face exactly the same poor aquatic habitat conditions and water conveyance threats to survival as native fishes, including listed anadromous salmonids.

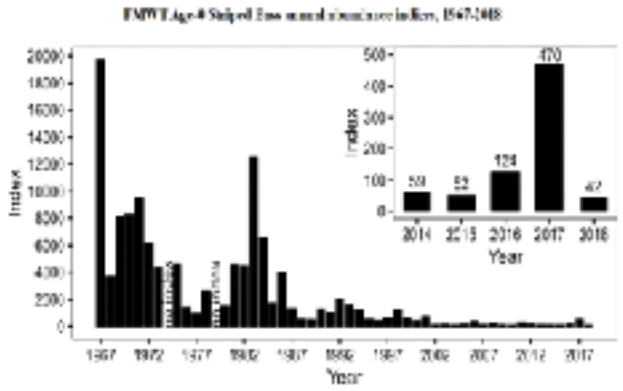
The belief that the elimination of striped bass and black bass from the Sacramento Valley and Delta systems will be a panacea to restored salmonid fisheries is a fallacy. Stripers and salmonids have co-existed in our rivers, at population levels far higher than they exist today, for over 120 years. During the first 10 years of implementation of the Striped Bass policy we saw some of the highest returns of salmon in the Sacramento River system (upwards of 720,000 fall run fish in 2002, over 27,000 spring run in 2003, over 17,000 winter run in 2007).

Over the past two years, our recreational angling community has been a committed party in discussions with FGC's and the DFW's leadership to present pragmatic solutions to the management of Striped Bass as a game fish. This included finding fiscal and non-fiscal management actions, including funding for the DFW to study, develop and implement a Fisheries Management Plan and/or other alternatives geared toward Striped Bass long term health and viability (conservation).

This proposal is one of those alternatives. The regulatory change petition proposed by NCGASA and supported by our organizations offers a low-cost alternative management tool that will promote the conservation of Striped Bass. By restricting take to a specific target size range, younger, sub-adult, Striped Bass females will have an opportunity to reach reproductive maturity and older large adults will be prevented from catch from the SFEW during their most reproductive years.

Additionally, NCGASA has committed financial resources to collect real time data on the Striped Bass population to facilitate management decisions based upon defensible science. It is our sincere hope that our recreational angling community can team with DFW to provide credible science on the current status of the Striped Bass to conserve Striped Bass for future generations of anglers.

Striped bass were introduced in the late 1800s due to the decline / disappearance of the Chinook salmon populations in the Sacramento River. The California Department of Fish and Wildlife (CDFW) has changed the regulations on striped bass at least three times since 1935, and all changes (closed commercial fishery; decreased bag limits; increased total length) have been toward reducing fishing mortality (catch) to protect the population. Many striped bass fishing groups have observed and recorded a large decline in the striped bass population the past 55 years, and notified the CDFW of their concerns. Despite attempts by CDFW to increase the population with hatchery efforts and reduced catch by changing fishing regulations, the population continues to decline. Data from the Fall Mid Water Trawl Age – 0 Striped Bass annual abundance indices from 1967 - 2018 depict the collapse of recruitment. Since abundance mirrors recruitment, it is highly likely that striped bass population index reflects the recruitment shown below.



The recruitment and population declines have been attributed to multiple stressors such as water conveyance, contaminants, introduced species and habitat deficiencies. It also reflects the impacts of the catch of immature females removed from the population prior to reaching sexual maturity, thus they have no ability to spawn for the first time.

Fishing regulation changes are a delicate balance between the need to protect a fishery from continued overfishing and stakeholder desires. The slot limit proposed by the Nor-Cal Guides and Sportsman's Association and many other fishing groups is no different and takes into account the socioeconomic demands at the expense of striped bass protection and recovery. The proposed regulation was determined by consensus amongst numerous fishing groups consisting of hundreds of individuals, understanding that California's fishing license sales generated $64M in 2021, while fishing industry revenues exceeded $260M.

It is not just the salmon and delta smelt populations that are in crisis. The striped bass population is collapsing parallel to the salmon populations and for the same reasons. The striped bass population is in desperate trouble at each life stage critical to supporting a viable population. Striped bass are broadcast spawners with each female producing hundreds of thousands if not millions of eggs/larvae. In a healthy ecosystem only a very few of these larvae ever survive to become adults. It's been documented for over a 10-year period that maternal transfer of contaminants causes over 90% of striped bass larvae to die prior to first feeding (Ostrach et al. PNAS, 2008, Ostrach et al. POD final report 2009). It has been documented in the pelagic organism decline studies that the few larvae that survive as juveniles are subjected to poor water quality and contaminants such that extremely high incidences of parasitism and disease are found in these young fish and very few survive as young of the year fish (Ostrach D.J. et al., POD final report 2009, Durieux E.D. et al. 2010, Spearow J.L. et al. 2010). This provides clear credible scientific evidence as to why the young of the year index for striped bass has been near zero for the past decades. The "young

of the year" index directly relates to population recruitment. The latest fall midwater trawl data for striped bass indicates one of the lowest indices ever recorded. In addition, current fishing regulations allow for the removal of female striped bass before they reach sexual maturity removing them from the breeding population resulting in having fewer females to spawn in subsequent years. Current regulations also allow for the removal of the largest females from the system. Typically the larger/older fish produce the most and the highest quality eggs. Removing them from the system causes the most successful and fecund striped bass to be taken out of the breeding pool. Striped bass growth rates are approximately half of what they were 25 or 30 years ago which relates to poor quality food and environmental conditions. For there to be a robust viable recreational fishery the striped bass population needs to be stabilized and restored.

In order to sustain Striped Bass populations, several East Coast states (e.g., Maine, Massachusetts, New York, and others), adopted slot lengths. These slot length limits ensure that female Striped Bass reach sexual maturity and have more than one opportunity to spawn before been captured. Over the decades of the slot length limit regulation implementation, small changes have been made based upon the health of the Striped Bass population which is tied to riverine, estuarine, and marine habitat conditions and food availability. The recreational angling community strongly supports the principles for Adaptive Management which must be built into Fishery Management Plans due to unpredictable environmental changes to sustain viable recreational angling opportunities in California. Bradley et al (2019) provided a new approach to fisheries data systems which promotes innovation to increase data coverage, accuracy and resolution, while reducing costs and allowing adaptive, responsive, near real-time management decision-making to improve fisheries outcomes.
Specifically targeting non-native species as "predator control" is misguided and runs antithetical to the mission of the Fish and Game Commission. The FGC should be about restoring all recreational fishing opportunities, not picking winners and losers and making judgement calls about the relative values of one recreational fishery vs another.

Further, if the opponents of this measure wish to point fingers at non-native species as the singular cause of salmonid declines, we in turn point out that the pike minnow and sea lions, both native California species, are also well documented predators that significantly impact salmonid success. And both exist in far greater numbers than called for in scientific monitoring plans.

Make no mistake, all of our organizations care deeply about thriving salmon fisheries. The fall run fishery, which is the primary source of commercial and recreational harvest, has declined to such a point that federal disaster funding for commercial fishermen has become an annual occurrence, and the bag limit for Sacramento River salmon was reduced to 1 in 2018.

However, our organizations point to a myriad of structural, management, and natural pressures that have led to the significant decline of salmonids, starting with the fact that we have prevented access to hundreds of miles of cold, upstream spawning areas when we damned the Sacramento, Feather, American and many other tributaries. Add to this mix intense droughts, reductions in pulse flows, outdated hatcheries at the state and federal level, lack of spawning and rearing habitat, failures of the Shasta cold water curtain, lack of food and biomass in the river systems, all of which are far more pressing stressors on the system.

The conversation about the approval or denial of this proposed striped bass policy also occurs in a vacuum. If the Commission will not consider taking an action on a recreational fishery in order to "improve" outcomes for a specific fishery, why has the Commission never previously weighed in with the State or sister agencies on other actions that would benefit salmonids? As an example, the Commission could have on many occasions petitioned the State Water Resources Control Board, Department of Water Resources, Department of Fish and Wildlife, or the California Natural Resources Agency on any number of management strategies that would have funded habitat, left more water in river systems, promoted increase energetic values for salmonids, funded updated hatcheries and trucking capacity, or other hatchery management improvements. If the adoption of a whole new policy is necessary to protect listed

fish, why has the Commission consistently failed to engage on these issues and only engage on one which causes detrimental harm to a robust recreational fishery?

Over 7,000 to 10,000 anglers visit the Delta annually for the opportunity to fish in professional black bass tournaments. These tournaments hosted by FLW, B.A.S.S., and others recognize California's Delta as a world class destination for tournament sportfishing. High schools in California's Delta have bass fishing teams. Bass fishing represents one of the last thriving and significant recreational fisheries in inland California. It is an economic, tourism, and angling opportunity powerhouse that remains un-paralleled. Our guides depend on it. Our small communities who benefit from the influx of visitors depend on it. The future interest in angling and license sales in California depend on it.

Recreational fishing represents good, clean, family-oriented fun. Anglers practice their sport on the water in the great outdoors and are true conservationists. The California Department of Fish and Wildlife is currently convening a sport fishing "R3 Group." The goal is to *Recruit* youth and new anglers to the sport, *Retain* those who are now participating in the sport, and to *Reactivate* those who have fished in the past but have lapsed as anglers. This R3 group will collaborate with the CDFW to identify barriers to sport fishing and the decline in license sales, address those barriers and submit recommendations to the legislature, and create an intergovernmental and public/private sector partnership to address the decline of California's sportfishing participation.

Obviously, increasing the number of California anglers would bring in more license revenues to support the Department of Fish and Wildlife. It would benefit the state's economy and tax revenue base. In 2011, the US Fish and Wildlife Service and Census estimated that sportfishing in California produced economic activity of $4.6 billion, with almost 36,000 jobs and $334 million in state and local tax revenues. Fishing participation means greater license sales which in turn means a greater investment in conservation and fishery resources.

However, we can assure you that the fundamental problem to California's declining number of anglers is one thing: the lack of fish and fishing opportunity in the state. As bag limits decrease, rivers close, seasons shorten, and opportunity dwindles the state needs only to realize one thing; there will be no anglers without fish.

NCGASA members are on the water almost every day. We know the water systems and fisheries better than almost anyone. Most sensible people don't believe stripers are the reason for the decline of salmonids. Further, as you have heard multiple times now, science proves predation is a minor stressor on salmonids. Trying to solve the salmonid issue by eliminating striped bass and black bass will only destroy a remaining recreational fishery, and in 10 years we will still be right back here wondering why listed species just went extinct.

Striped bass and black bass fishing are a major driver in recreational angling enthusiasm. Please be aware that eliminating these fisheries will drive angling efforts towards other fisheries, causing unintended impacts you are not currently considering. Further, angler effort will change and fewer fishing licenses will be sold. We are already down 55% in license sales since the 1980s. For the sake of CDFW funding we cannot afford to go lose any more anglers.

Finally, the loss of economic value if bass fisheries are destroyed cannot be overstated. Guides, bait and tackle stores, marinas, tournament fishing, boat sales, hotel and restaurant and gas sales, retail sales, fishing license revenue…the list goes on and on. .

The job of the Commission is to promote and protect recreational fisheries in CA, not to destroy them thru policy. We ask that you keep this in mind today when voting on this issue.

Sincerely,

James Stone
Northern California Guides and Sportsmen's Association
President

Cc: Melissa Miller-Henson, Executive Director, FGC
Chuck Bonham, Director, California Department of Fish and Wildlife
Jay Rowan, Chief, Fisheries Branch, CDFW