



Mr. Eric Sklar, President
California Fish and Game Commission
1416 Ninth Street, Suite 1320
Sacramento, CA 95814

July 25, 2019

RE: Striped Bass and Delta Fisheries Management Policies

Dear President Sklar and Members of the Fish and Game Commission:

The Congressional Sportsmen's Foundation opposes the Commission's proposed repeal of the 1996 Striped Bass Policy and strongly urges the Commission to define "best available science" in the draft Delta Fisheries Management Policy.

Established in 1989, the Congressional Sportsmen's Foundation (CSF) works with the Congressional Sportsmen's Caucus, the largest, most active bipartisan caucus on Capitol Hill with nearly 250 Members of Congress from both the House and Senate. Fifteen years ago, CSF extended the legislative network from Washington, DC to states across the country, establishing the bipartisan National Assembly of Sportsmen's Caucuses, which today is made up of 49 state legislative caucuses, and includes over 2,500 legislators. Ten years ago, CSF established a bipartisan Governors Sportsmen's Caucus, which includes more than half the governors from throughout the country. Together, this collective force of bipartisan elected officials works to protect and advance hunting, angling, recreational shooting and trapping for the nearly 40 million sportsmen and women who spend \$90 billion annually on our outdoor pursuits.

The California Outdoor Sporting Caucus joined the National Assembly of Sportsmen's Caucuses in 2004 to represent the interest of the Golden State's 1.82 million hunters and anglers, who spend \$3.5 billion annually and support more than 56,000 jobs within the state.

CSF acknowledges and respects the Commission's commitment to fisheries management in the Delta and protection of listed species and species of concern. However, it is the responsibility of the Commission and the Department to manage Delta resources holistically and sustainably to protect and enhance the Delta ecosystem. The Commission has effectively managed both native and non-native fish species for decades and has created a world-class striped bass fishery and

black bass fishery that attracts anglers from all over the world. Collectively, this contributes to a healthy Delta ecosystem, which provides an economically valuable and recreationally important fishery.

Non-native striped and black bass have co-existed in the Delta since their introduction in 1879. Like the listed species and species of concern, striped bass see population fluctuations due to changes in environmental and hydrological conditions such as water flows, temperature variations and aquatic habitat degradation. Like with any population of fish in a lotic or estuarine environment, these factors are the primary drivers of population abundance. When these conditions have been good for fish, both the listed species and species of concern have enjoyed high population numbers, just as the striped bass population has as well, intimating that predation is not a significant factor driving population abundance.

Repeal of the 1996 Striped Bass Policy and the proposed Delta Fisheries Management Policy would unjustifiably misdirect the blame for listed species and species of concern population declines to the Delta's non-native, popular sport fisheries. Efforts to eliminate or reduce the striped bass and black bass populations would have an irreplaceable detrimental effect on recreational fishing and the economies of local communities surrounding the Delta. Therefore, CSF opposes the repeal of the 1996 Striped Bass Policy.

Additionally, CSF strongly urges the Commission to define "best available science" under the Delta Fisheries Management Policy. Failure to define best available science leaves the Commission at risk of making fundamental Delta fishery management decisions based on inadequate, unsupported or unreliable sources. It is the recommendation of CSF that the Commission define "best available science" as "peer-reviewed," and preferably science that addresses all significant factors influencing population-level dynamics in the Delta. Furthermore, a comprehensive analysis prior to any management decisions should also include peer-reviewed research that discusses additional limiting factors such as water management and allocation policy, development and water diversion infrastructure.

CSF looks forward to working with the Commission on managing the Delta fisheries resources holistically, including managing for both native and non-native species that contribute to a productive, sustainable and economically viable recreational fishery.

Respectfully,



Aoibheann Cline
Western States Coordinator
Congressional Sportsmen's Foundation



Chris Horton
Senior Fisheries Director
Congressional Sportsmen's Foundation