Staff Summary for April 16-17, 2025

23. Recreational Take of Barred Sand Bass

Today's Item **Information ☐** **Action ☒**

Consider adopting proposed amendments to regulations for the recreational barred sand bass fishery.

Summary of Previous/Future Actions

• Department update to the Marine Resources Committee (MRC); discussion on recreational barred sand bass fishery and considerations for potential regulation changes	July 17-18, 2024; MRC
• Department update and MRC recommendation	November 6-7, 2024; MRC
• Notice hearing	December 11-12, 2024
• Discussion hearing	February 12-13, 2025
• **Today's adoption hearing**	**April 16-17, 2025**

Background

At its December 2024 meeting, the Commission authorized publication of a notice of its intent to amend Section 28.30 related to recreational barred sand bass fishing. The Commission proposed a barred sand bass sub-bag limit (within the existing 5-fish bag limit for barred, kelp, and spotted sand bass combined) with a range of 0-5 fish for the summer spawning season (June through August) and a range of 1-5 fish for the remainder of the year. The Commission also specified a sunset provision that would automatically terminate the barred sand bass sublimit on June 1, 2028 unless the Commission took formal action to alter the sunset provision. Further background on the proposal can be found in exhibits 1 and 2, with details in the initial statement of reasons (Exhibit 3) and draft regulatory language (Exhibit 4).

At the February 2025 discussion hearing, the Commission considered input from various stakeholders and explored options for a temporary sub-bag limit that could encourage the recreational fishing industry and researchers to participate in gathering additional data, which could inform longer-term conservation measures for the barred sand bass fishery and stock.

Update

Comments received during the notice period, and Department responses, can be found in the pre-adoption statement of reasons (Exhibit 8). At today's adoption hearing, the Department will provide a presentation and recommendation (exhibits 6 and 8, respectively) to help inform the Commission's discussion and selection of barred sand bass bag limits, sub-bag limits for both the summer spawning season and the remainder of the year, and regulation sunset.

Significant Public Comments

1. Mayor Matthew Pagano, City of Dana Point, states that a reduction in bag limits for barred sand bass could impact the livelihoods of local businesses and may discourage recreational fishing opportunities in the city's waters. The mayor also encourages ongoing communication between the Department and local stakeholders, and for

decisions related to management of barred sand bass to be informed by enhanced scientific data (Exhibit 9).

2. Lyall Belquist, Ph.D, provides two letters in support of the strongest proposed conservation measures for barred sand bass. States that regulation changes in 2013 were insufficient to protect the species, that a summer spawning season closure is necessary, and that industry data from the fishery supports significant restrictions (Exhibit 10).
3. Several commenters express opposition to new restrictions on the recreational take of barred sand bass, including one with over 700 signatures, citing concerns about social cultural and economic impacts. Representative samples of form email comments opposing restrictions on the recreational take of barred sand bass are provided, with concerns stated as lack of scientific evidence and data, potential irreversible damage to the marine environment, failure to acknowledge migratory behavior, a disproportionate impact on disadvantaged anglers, and economic impacts on fishing communities. (Exhibits 11 and 12.)
4. Both a recreational fishing advocacy organization (Exhibit 13) and seven environmental non-governmental organizations (NGOs) (Exhibit 14) strongly urge a seasonal closure (June – August) and stricter bag limit (two fish) to rebuild the barred sand bass fishery, in part by protecting vulnerable spawning aggregations, citing scientific findings substantiating necessity (Exhibit 13). The NGOs express deep concerned over the Commission's apparent shift away from science-based management, stressing the importance of the Department's data and a precautionary approach under the Marine Life Management Act and climate change. Both letters emphasize sustainable management for all users and future generations, cautioning against prioritizing short-term stakeholder interests over long-term ecological health.

Recommendation

Commission staff: Recognizing the value of stakeholder and industry survey data, and contingent upon the inclusion of a short-term sunset provision of June 1, 2028, adopt the proposed regulations as recommended by the Department. Request the Department provide an update on collaborative efforts with the recreational fishing fleet and initial data results after the first season of data collection.

Department: Adopt the proposed regulations with a year-round sub-bag limit of four barred sand bass and a sunset provision allowing the regulations to expire on June 1, 2028.

Exhibits

1. Staff summary from December 11-12, 2024 Commission meeting, Agenda Item 5 (*for background purposes only)*
2. Staff summary from November 6-7, 2024 MRC meeting, Agenda Item 5 (*for background purposes only*)
3. Initial statement of reasons
4. Noticed regulatory language
5. Economic and fiscal impact analysis (STD. 399)

6. Department presentation
7. Department memo transmitting pre-adoption statement of reasons (PSOR), received April 8, 2025
8. Pre-adoption statement of reasons with summary of and responses to public comments, received April 8, 2025
9. Letter from Matthew Pagano, Mayor, City of Dana Point, received February 21, 2025
10. Emails from Lyall Bellquist, Ph.D, received February 11, 2025 and April 2, 2025
11. Representative sample of ten comments received opposed to further restrictions on barred sand bass, including an email signed onto by 715 individuals, received between February 11, 2025 and March 24, 2025
12. Sample letters opposed to restrictions on the take of barred sand bass, including a form letter signed by approximately 20 individuals, received February 12, 2025
13. Letter from Anupa Asokan, Founder and Executive Director, Fish On, and Brenton Spies, Ph.D., research scientist and fisherman, CSU Channel Islands, received April 3, 2025
14. Letter from Katie O'Donnell, US Ocean Conservation Manager, WILDCOAST, and six other environmental NGOs, received April 3, 2025

Motion

Moved by _____ and seconded by _____ that the Commission adopts the proposed changes to Section 28.30 related to recreational take of barred sand bass, with a *year-round sub-bag limit of 4 fish*, to expire June 1, 2028.

Staff Summary for December 11-12, 2024
(*For background purposes only*)

5. Recreational Take of Barred Sand Bass

Today's Item **Information ☐** **Action ☒**

Consider authorizing publication of notice of intent to amend recreational fishing regulations for barred sand bass.

Summary of Previous/Future Actions

• Department update to the Marine Resources Committee (MRC) and discussion on the recreational barred sand bass fishery and considerations for potential regulation changes	July 17-18, 2024; MRC
• Update and MRC recommendation	November 6-7, 2024; MRC
• **Today's notice hearing**	**December 11-12, 2024**
• Discussion hearing	February 12-13, 2025
• Adoption hearing	April 16-17, 2025

Background

The recreational barred sand bass fishery is open year-round and managed collectively with kelp bass and spotted sand bass. Current regulations were established in 2013 due to concerns about the status of kelp bass and barred sand bass populations; the regulations impose a 5-fish bag limit for any combination of the three species and a 14-inch minimum size limit.

Recent data analysis has revealed a significantly depleted population of barred sand bass in southern California. Both fishery-independent and fishery-dependent data indicate a lack of substantial recruitment in recent years, which suggests that the 2013 regulations have not adequately protected the stock. As a result, the Department began consulting with fishing industry representatives, fishery researchers, and other stakeholders to explore potential regulatory changes.

In June 2024, the Department requested, and the Commission agreed to, refer the topic of barred sand bass to MRC. MRC discussed the issue in July and November of 2024 (see Exhibit 1 for a summary of population trends, management responses, and stakeholder engagement).

Based on discussions with a Department-formed working group, at the November 2024 MRC meeting, the Department proposed for the recreational take of barred sand bass a near-term reduction of the sub-bag limit from 5 to 4 fish within the overall bag limit of 5 fish (for any combination of kelp bass, barred sand bass, and spotted sand bass), with a 3-year sunset provision. This interim measure was proposed to ensure conservation of barred sand bass while the Department, alongside stakeholders, addresses data gaps and modeling needs and evaluates potential future regulatory proposals.

MRC supported the proposed sunset provision and recommended that the Commission authorize a notice of intent to amend regulations governing the recreational take of barred sand bass, to commence in December (this meeting), with a 3-year sunset provision as proposed by the Department. However, MRC expressed concern about the adequacy of the proposed interim sub-bag limit for barred sand bass, particularly during spawning season. Instead of endorsing a specific sub-bag limit, MRC recommended including a range of options (1-5 fish) for setting sub-bag limits during and outside the spawning season, to allow the Commission to deliberate and make the final decision.

For today's meeting, the Department's memo (Exhibit 2) outlines the recommended changes to recreational barred sand bass regulations, aligned with the MRC recommendation. The memo includes draft proposed regulatory language the Commission may choose to refine or direct staff to modify prior to notice. The proposal includes:

- a sub-bag limit for barred sand bass during the spawning season (June through August), ranging from 1 to 5 fish;
- a sub-bag limit for barred sand bass during all other months, ranging from 1 to 5 fish; and
- a sunset provision for the new regulation, repealing the regulation as of June 1, 2028.

Visual aids and additional background information on the proposal are in the Department's presentation (Exhibit 3).

If the Commission chooses to select specific sub-bag limits in the proposed regulatory language, the initial statement of reasons developed prior to issuing notice could clarify that during the rulemaking process the Commission is still considering a range of sub-bag limits for recreational take of barred sand bass.

Significant Public Comments

Two fisheries scientists and an environmental non-governmental organization (NGO) recommend a zero-fish bag limit (aka closure) during the spawning season (June through August) (exhibits 4-6). The scientists argue that the barred sand bass fishery is not data-limited, it is a misconception that existing data are inadequate, and stronger measures are needed to recover spawning aggregations and rebuild the fishery (exhibits 4 and 5).

- A fisheries scientist also recommends coupling the seasonal closure with a size limit reduction to 13 inches, drawing on key vulnerability factors for the fishery and lessons learned from management measures in other fisheries (Exhibit 4).
- A scientist who served as a barred sand bass expert on the Department's collaborative working group, highlights previous management measures in the fishery and assesses contemporary scientific data, including 31 published scientific papers from 1996 to 2024 on barred sand bass. They argue a seasonal closure would not cause significant hardship to the recreational fishery, and that potential short-term economic impacts should not outweigh action necessary to ensure the fishery's long-term health. (Exhibit 5)

- An environmental NGO urges the Commission to incorporate into its public notice a zero-fish bag limit option for June through August, and to ultimately adopt this closure option at the adoption hearing (Exhibit 6).

Recommendation

Commission staff: Authorize publication of a notice of intent to amend regulations as recommended by MRC and the Department. Confirm the proposed season dates in the draft regulatory language and identify sub-bag limits for the two time periods to include in the notice, to support transparency during the notice period.

Committee: Authorize publication of a notice of intent to amend regulations regarding recreational take of barred sand bass with a sub-bag limit range of 1 to 5 fish, a season date option for differing bag limits, and a three-year sunset provision.

Department: Authorize publication of a notice of intent to amend regulations regarding recreational take of barred sand bass as outlined in the Department's memo and presentation.

Exhibits

1. Staff summary for Agenda Item 5, November 6-7, 2024 MRC (*for background purposes only)*
2. Department memo, including draft proposed regulatory language, received November 27, 2024
3. Department presentation
4. Email from Erica Mason, Ph.D., received November 25, 2024
5. Email from Lyall Belquist, Ph.D., received November 26, 2024
6. Email from Greg Helms, Manager, Fish Conservation Program, Ocean Conservancy, received December 2, 2024

Motion

Moved by _____ and seconded by _____ that the Commission authorizes publication of a notice of its intent to amend Section 28.30 related to recreational take of barred sand bass, with a sub-bag limit range of _____ fish for the summer spawning season (June through August); a sub-bag limit range of _____ fish for the remainder of the year; and a sunset provision of three years, to expire June 1, 2028, as discussed today; and requests that the Department continue to collaborate with the sport fishing industry, researchers, and stakeholders to fill data gaps and develop longer-term management options.

Committee Staff Summary for November 6-7, 2024 MRC
(*For background purposes only*)

5. Recreational Barred Sand Bass Fishery

Today's Item **Information ☐** **Action ☒**

Receive and discuss Department's update on the recreational barred sand bass fishery, barred sand bass working group outcomes, and recommendations for potential regulation changes; develop potential committee recommendation.

Summary of Previous/Future Actions

- Department update and discussion on the recreational barred sand bass fishery and considerations for potential regulation changes — July 17-18, 2024; MRC
- **Today receive an update and recommendations for potential regulation changes** — **November 6-7, 2024; MRC**

Background

The barred sand bass fishery is an historic recreational fishery in southern California that is open year-round and managed collectively with kelp bass and spotted sand bass. Current regulations include a five-fish bag limit (in any combination of the three species) and a minimum size limit of 14 inches (35.6 centimeters); these were established in 2013 due to concerns about the status of kelp bass and barred sand bass stocks.

Population Trends, Management Response, and Stakeholder Engagement

While no formal stock assessment exists for barred sand bass, abundance estimates suggest a severely depressed population in southern California. The presumed decline is likely due to a combination of environmental conditions, poor recruitment, and fishing pressure on easily targeted spawning aggregations.

The Department has analyzed available data for the species. Fishery-dependent data indicate continued declines in barred sand bass, except for the past year, with spawning aggregations becoming much smaller or difficult to find. Fishery-independent data over the past several years have shown a pulse of fish entering the fishery, corroborated by the fishery-dependent data showing a slight increase in catch. However, there has been no sizeable recruitment pulse seen behind the entry fish, suggesting that current regulations established in 2013 (lower bag limit and increased size limit) are insufficient to protect the stock, especially if the observed year class of juveniles enters the fishery and fishing effort increases.

Due to population concerns, the Department began discussions with the recreational fishing community and academic community about potential changes to barred sand bass fishery regulations. The Department also requested the Commission refer the topic to MRC and committed to bring a range of recommendations for MRC discussion.

July 2024 MRC Meeting

Committee Staff Summary for November 6-7, 2024 MRC
(*For background purposes only*)

At the July MRC meeting, the Department presented an overview of the available data for barred sand bass, highlighted outreach to date regarding the types of potential management changes under consideration, and described additional collaboration with sport fishing associations and researchers to help recover barred sand bass populations while minimizing impacts to recreational fishing. The Department committed to forming a working group of researchers, recreational fishery representatives, and stakeholders to jointly develop a recommendation for recreational fishery regulations to bring to the November 2024 MRC meeting for discussion, and to support developing a potential recommendation for Commission consideration.

Update

Following the July MRC meeting, the Department convened and has worked closely with a group of sport fishing associations and researchers, including facilitating two meetings. The goals of the working group are to improve shared understanding of the current status of the barred sand bass population and fishery; develop a shared understanding of the current need for a conservation measure; identify information gaps and strategies to collaborate on future data collection; and support an open, collaborative process to share information on the species and fishery.

Today, the Department will present additional details regarding barred sand bass life history and fishery analyses reviewed with the working group, present the outcomes of the working group and its collaboratively-developed options for regulation changes, and provide recommendations for discussion and potential committee recommendation (Exhibit 1). The Department supports a management measure for a period of three years, during which time Department staff would continue to work with stakeholders to fill priority research gaps and develop a long-term conservation strategy to protect barred sand bass spawning aggregations.

Significant Public Comments

1. A sport fishing association representative, who is also a member of the Department's barred sand bass working group, supports the recommended barred sand bass sub-bag limit of four as a three-year, interim, conservation measure (Exhibit 2). They also support utilizing sport fishing organizations to fill knowledge and data gaps. In addition, they share observations about the fishery, including barred sand bass migration and spawning behavior, the relationship between catch rate and regulations, and shifts in fishing effort.
2. A representative of a recreational fishing advocacy organization shares the Department's concern about the health of the barred sand bass population and urges the Commission to take steps to allow it to recover (Exhibit 3). Rather than changing bag or size limits, they propose closing some of the known spawning aggregation sites in southern California to barred sand bass fishing for a specific period or closing barred sand bass fishing during spawning months, as there are other sport fishing opportunities available in the summer. Alternatively, they suggest the regulation changes could be a combination of some fraction of the spawning season combined with size and bag limit adjustments.

Committee Staff Summary for November 6-7, 2024 MRC
(*For background purposes only*)

Recommendation

Commission staff: Support the Department's recommendation to advance a regulation for the barred sand bass fishery, with a regulation sunset date, and public notice in December as discussed today. Support continuation of the Department's work with stakeholders to fill data gaps and develop a long-term conservation strategy for barred sand bass.

Department: Support developing an interim regulation of a year-round bag limit of four barred sand bass, with no more than five bass in combination, with a sunset date after three years, while the Department continues to work with stakeholders to fill priority research gaps and develop a long-term conservation strategy based on best available science to protect barred sand bass spawning aggregations.

Exhibits

1. Department presentation
2. Email from Merit McCrea, Sportfishing Association of California, received October 24, 2024
3. Email from Matt Band, Allwaters Protection & Access Coalition, received October 24, 2024

Committee Direction/Recommendation

The Marine Resources Committee recommends that the Commission: (1) schedule a rulemaking with notice in December 2024 to set a year-round bag limit of four barred sand bass, with no more than five bass in combination, and a regulation sunset of three years, as recommended by the Department; and (2) support the Department's efforts to continue to work with stakeholders to fill priority research gaps and develop a long-term conservation strategy based on best available science to protect barred sand bass spawning aggregations.

State of California
Fish and Game Commission
Initial Statement of Reasons for Regulatory Action

Amend Section 28.30
Title 14, California Code of Regulations
Re: Recreational Take of Barred Sand Bass

I. Date of Initial Statement of Reasons: December 11, 2024

II. Dates and Locations of Scheduled Hearings

(a) Notice Hearing:

Date: December 11, 2024 Location: Sacramento

(b) Discussion Hearing:

Date: February 12-13, 2025 Location: Sacramento

(c) Adoption Hearing:

Date: April 16-17, 2025 Location: Sacramento

III. Description of Regulatory Action

(a) Statement of Specific Purpose of Regulatory Change and Factual Basis for Determining that Regulation Change is Reasonably Necessary

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations (CCR). Commission refers to the California Fish and Game Commission unless otherwise specified. Department refers to the California Department of Fish and Wildlife unless otherwise specified.

The proposed changes focus on Section 28.30(b), which defines a minimum size limit and a bag and possession limit for kelp bass, barred sand bass, and spotted sand bass combined for recreational fishers. The last time these regulations were subject to major amendment was March 2013 which decreased the bag limit from ten to five in aggregate of the three jointly managed saltwater bass species (*Paralabrax sp.*) and increased the minimum size limit from 12 to 14 inches. Reduced bag and possession limits for barred sand bass during the spawning season were also recommended as an option, but the species-specific regulation was not adopted. The stock of barred sand bass has shown slow signs of recovery since 2013. This could be due to several factors including continued fishing pressure during the summer spawning months when barred sand bass are most vulnerable to fishing and intermittent recruitment of young-of-the-year. The proposed amendment represents the cumulation of the Department’s internal discussion as well as input from industry representatives, fishery researchers, fishing communities, and the California Fish and Game Commission Marine Resources Committee (MRC). The proposed changes are necessary to preserve fishing opportunity and ensure the sustainable management of barred sand bass.

BACKGROUND

Barred sand bass (*Paralabrax nebulifer*) are one of the most common sea basses inhabiting southern California coastal waters along with the two other species of bass: kelp bass (*Paralabrax clathratus*) and spotted sand bass (*Paralabrax maculatofasciatus*). Barred sand bass are generalist mesopredators and range from southern Baja California, Mexico to central California, though are rare north of Point Conception. Juveniles can be found over shallow sandy bottoms in bays and estuaries, while adults tend to inhabit the ecotone where sand meets rocky reef. Barred sand bass have a small home range; however, in the months of June through August have been observed and tracked making large migratory movements to spawning grounds tens of kilometers away from their home reef where they form large spawning aggregations. This historically happens over soft bottom habitat though the past couple of years has been observed over hard bottom. They mature between two to five years, can live up to 25 years, and can grow up to 67 centimeters (cm) (26 inches) in length.

For decades, barred sand bass ranked as one of the most commonly caught and retained marine sport fishes in southern California. In the summer months, commercial passenger sport fishing vessels (CPFVs) and private fishing boats targeted the large spawning aggregations, as this is when the fish are easily found and caught. From the 1990s through early 2000s, annual landings of barred sand bass exceeding 500,000 were not uncommon from CPFVs logs (Figure 1). CPFV landings declined in the late 2000s and have remained a fraction of the previous decade's landings. Regulations were passed in 2013 that decreased the bag limit from ten to five in aggregate of the three jointly managed saltwater bass species (*Paralabrax sp.*) and increased the minimum size limit from 12 to 14 inches. Reduced bag and possession limits for barred sand bass during the spawning season were also recommended as an option, but the species-specific regulation was not adopted. Unlike kelp bass, the stock of barred sand bass has shown slow signs of recovery since the 2013 regulation implementation. This slow recovery could be due to several factors, including continued fishing pressure during the summer months when barred sand bass form spawning aggregations and intermittent recruitment of young-of-the-year.

Barred sand bass aggregating behavior during spawning season makes them particularly vulnerable to fishing. These summertime aggregations are well known by the fishing fleet and have been targeted for decades. This aggregating behavior masks decreases in the population while giving the illusion that the stock is healthy since catch rates are stable and landings are high (Erisman et al 2011). Over time, the population can become so small that not enough members of the population remain to continue to form aggregations. This has been the case for barred sand bass in southern California for nearly the past decade, but in the last couple of years signs of these aggregations returning at their historic locations have begun to show (Figure 2).

The increase in barred sand bass landings in 2023 and 2024 are most likely a result of a large larvae recruitment event. In the last 60 years, there have been four major recruitment pulses for barred sand bass, with the last one occurring in the mid-2010s (Jarvis Mason et al. 2024). It takes approximately eight years for a barred sand bass to reach 14 inches to enter the fishery. Starting in 2017, the Department initiated scuba surveys in barred sand

bass preferred habitat in which staff count and size barred sand bass and other fishes. These annual surveys capture the cohorts of barred sand bass getting larger each year (Figure 3). While these observations of the increasing population size of barred sand bass is a promising sign that the population is recovering, it is apparent that there have been no large recruitment events after the pulse in the mid-2010s. The proposed sunset regulation provisions are intended to reduce the overall number of barred sand bass taken by reducing fishing effort during their spawning season when they are most susceptible to fishing. These three years of reduced fishing effort allows for the development of future regulations that use best available science to guide a sustainable measure that takes into consideration what is best for the fishery.

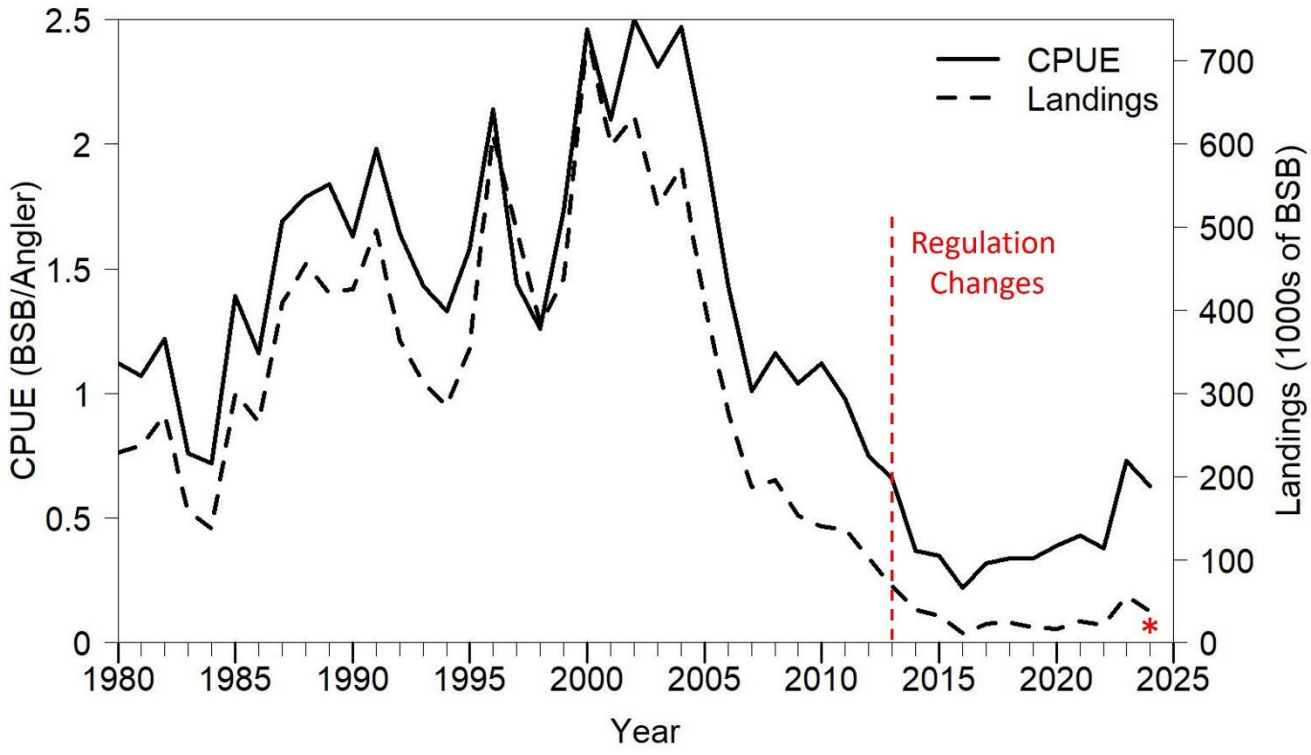

Figure 1. Catch per unit effort (CPUE, solid line) and landings (hashed line) of barred sand bass retained on CPFV trips from 1980 to 2024 (CDFW Marine Log System 2024). The red hashed line denotes the 2013 regulation changes, and the red asterisk denotes the 2024 data is preliminary and only contains data from January through September.

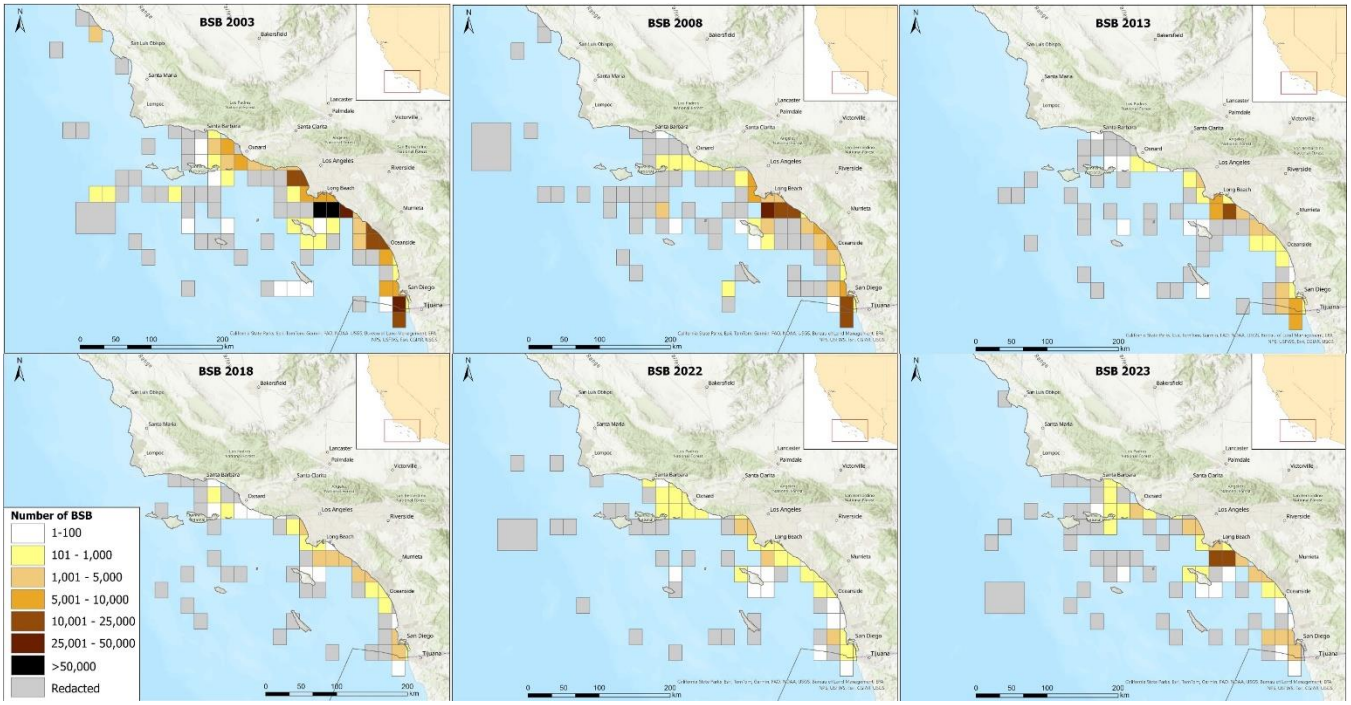

Figure 1. Heat maps of barred sand bass landings by CDFW fishing block for the years of 2003, 2008, 2013, 2018, 2022, and 2023 (CDFW Marine Log System 2024).

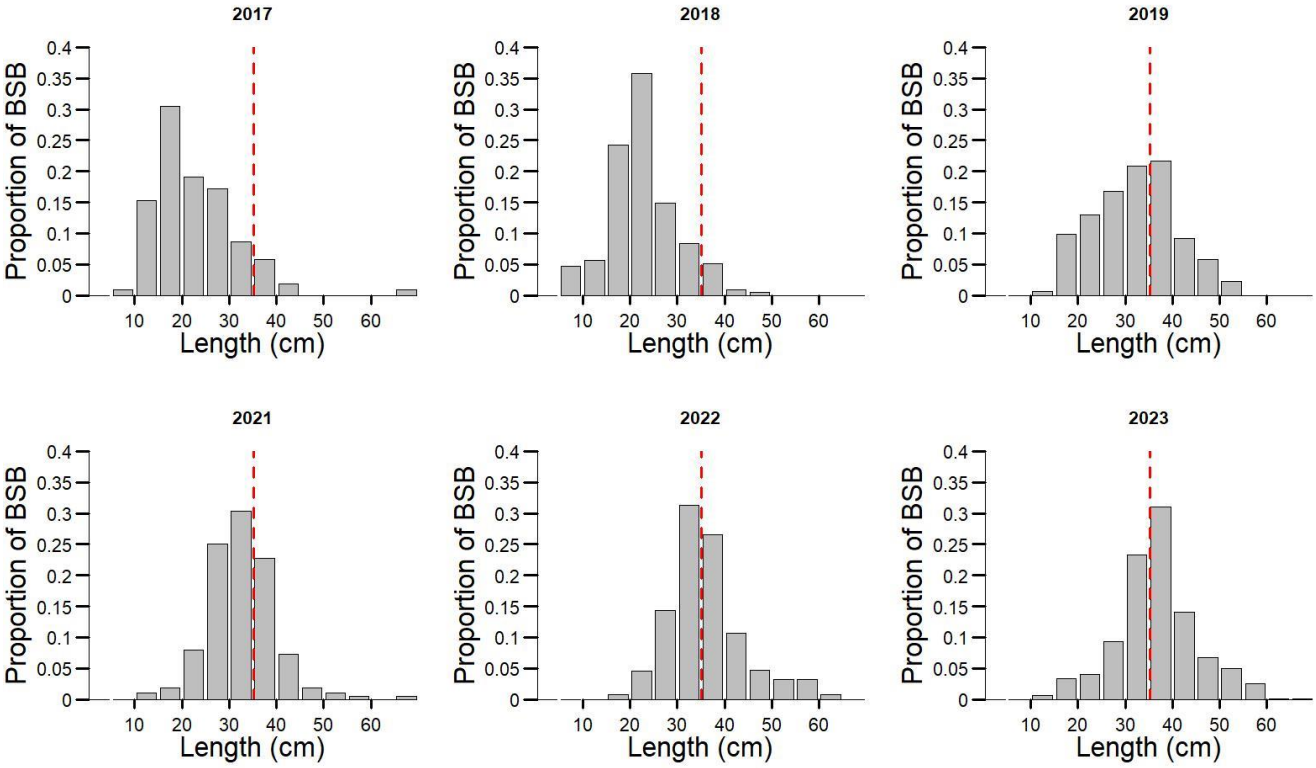

Figure 2. Size distribution data (5 cm bins) from CDFW barred sand bass scuba surveys (CDFW unpublished data 2024).

CURRENT REGULATIONS

Current laws governing barred sand bass are as follows:

Section 28.30 defines a minimum size limit and a bag and possession limit for kelp bass, barred sand bass, and spotted sand bass combined for recreational fishers. Current laws specify that the minimum size limit for the three species is 14 inches total length or ten inches alternate length (§28.30(a)). The bag and possession limit is five in any combination of species (§28.30(b)).

PROPOSED REGULATIONS

Proposed language in Section 28.30 includes a range of options for a sub-bag and possession limit for barred sand bass within the overall five-fish combined limit for kelp bass, barred sand bass and spotted sand bass, to be decided through the Commission public noticing process. The options are a range of bag and possession limits of 0-5 barred sand bass, varying seasonally, with a sunset provision ending June 1, 2028. Per direction from the MRC, a range of bag and possession limit options to consider in amending Title 14, Section 28.30 is described below:

Subsection 28.30(c)(1) is proposed to be added, which would create a limit within the spawning season on barred sand bass, which typically occurs from June to August. The bag and possession limit (0-5) for the spawning season (June 1-August 31) and for the will be determined by the Commission. This is necessary to reduce the overall number of barred sand bass taken by the fishery, specifically during the summer spawning months when barred sand bass are most vulnerable to fishing while forming spawning aggregations.

Subsection 28.30(c)(2) is proposed to be added, which would create a limit during all other months on barred sand bass (i.e., non-spawning seasons September 1-May 30). The bag and possession limit (1-5) will be determined by the Commission for these months. This is necessary to define the bag and possession for the months outside of the summer spawning season.

Subsection 28.30(d) is proposed to be added to provide for a sunset provision for subsection 28.30(c), repealing it as of June 1, 2028. The sunset provision is necessary to allow for conservation of barred sand bass while the Department works with partners on further reviewing data and developing models to evaluate potential future regulations that will help increase and sustain the barred sand bass population and support public fishing opportunities.

No changes are proposed for subsection 28.30(a) or 28.30(b).

(b) Goals and Benefits of the Regulation

The policy of this state is “to ensure the conservation, sustainable use, and, where feasible, restoration of California’s marine living resources for the benefit of all the citizens of the State” (Fish and Game Code Section 7050(b)). Additionally, The Marine Life Management Act (MLMA) is intended to ensure the conservation, sustainable use, and restoration of California’s marine living resources. In 2019, the Department assessed the state’s fisheries

under the 2018 Master Plan for Fisheries framework (Department 2018). A prioritization process identified barred sand bass as a high priority species in need of management attention. Adoption of the proposed bag and possession limits, and seasonal restrictions provides for the sustainable management of barred sand bass while preserving fishing opportunity.

(c) Authority and Reference Sections from Fish and Game Code for Regulation

Authority: Sections 200, 205, 219, 265 and 275, Fish and Game Code.
Reference: Sections 110, 200, 205, 219, 255, 265, 270 and 275, Fish and Game Code.

(d) Specific Technology or Equipment Required by Regulatory Change: None

(e) Identification of Reports or Documents Supporting Regulation Change

California Department of Fish and Wildlife. 2018. California Marine Life Management Act Master Plan.

California Department of Fish and Wildlife. 2024. Barred Sand Bass, Paralabrax nebulifer, Enhanced Status Report.

Erisman BE, Allen LG, Claisse JT, Pondella DJ, Miller EF, Murray JH, Walters C. 2011. The illusion of plenty: hyperstability masks collapses in two recreational fisheries that target fish spawning aggregations. Canadian Journal of Fisheries and Aquatic Sciences 68: 1705-1716.

Jarvis ET, Gliniak HL, Valle CF. 2014. Effects of fishing and the environment on the long-term sustainability of the recreational saltwater bass fishery in southern California. California Fish and Game 100(2): 234-259.

Jarvis Mason ET, Watson W, Ward EJ, Thompson AR, Semmens BX. 2024. Environment-driven trends in fish larval abundance predict fishery recruitment in two temperate reef congeners: Mechanisms and implications for fishery recovery under a changing ocean. bioRxiv, 2023-10.

(f) Public Discussions of Proposed Regulations Prior to Notice Publication

- February 20, 2024, presentation and discussion with representatives of the fishing community, remote attendance
- February 21, 2024, presentation and discussion with representatives of the research community, remote attendance
- April 30, 2024, presentation and discussion with representatives of the fishing community, remote attendance
- July 17-18, 2024, Marine Resources Committee meeting, update and discussion, Sacramento
- September 4, 2024, Barred Sand Bass Working Group meeting, Seal Beach
- October 7, 2024, Barred Sand Bass Working Group meeting update, remote attendance
- November 7, 2024, Marine Resources Committee meeting, update and recommendations, Sacramento

IV. Description of Reasonable Alternatives to Regulatory Action

(a) Alternatives to Regulation Change

No alternatives were identified by or brought to the attention of Commission staff that would have the same desired regulatory effect.

(b) No Change Alternative

Without the proposed changes, the outstanding issues concerning the regulations currently governing barred sand bass would remain unaddressed.

V. Mitigation Measures Required by Regulatory Action

The proposed regulatory action will have no negative impact on the environment; therefore, no mitigation measures are needed.

VI. Impact of Regulatory Action

The potential for significant statewide adverse economic impacts that might result from the proposed regulatory action has been assessed, and the following initial determinations relative to the required statutory categories have been made:

(a) Significant Statewide Adverse Economic Impact Directly Affecting Businesses, Including the Ability of California Businesses to Compete with Businesses in Other States:

The proposed action will not have a significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states. The Commission anticipates that the impact of the proposed regulations on the entirety of marine sport fishing activity is not expected to be sufficient to significantly impact sport fishing expenditures to businesses within the state.

(b) Impact on the Creation or Elimination of Jobs Within the State, the Creation of New Businesses or the Elimination of Existing Businesses, or the Expansion of Businesses in California; Benefits of the Regulation to the Health and Welfare of California Residents, Worker Safety, and the State's Environment:

The Commission does not anticipate any significant impacts on the creation or elimination of jobs, the creation of new businesses, the elimination of existing businesses, or the expansion of businesses in California. Sport fish-related businesses may have to adjust to changes in the composition of recreational fishing opportunities, but these changes are not expected to be substantial due to the fishery being kept open and from the sufficient substitutability of kelp bass as an alternative species.

(c) Cost Impacts on a Representative Private Person or Business:

The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

(d) Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State: None

(e) Nondiscretionary Costs/Savings to Local Agencies: None

(f) Programs Mandated on Local Agencies or School Districts: None

(g) Costs Imposed on Any Local Agency or School District that is Required to be Reimbursed Under Part 7 (commencing with Section 17500) of Division 4, Government Code: None

(h) Effect on Housing Costs: None

VII. Economic Impact Assessment

(a) Effects of the Regulation on the Creation or Elimination of Jobs Within the State:

The cumulative effects of the changes statewide are estimated to be neutral to job creation or elimination within the state. No significant changes in total fishing effort and fishing expenditures to businesses are expected as a direct result of the proposed regulation changes. However, some short-term job losses may occur as sport fish-related businesses adjust to changes in the composition of recreational fishing opportunities.

(b) Effects of the Regulation on the Creation of New Businesses or the Elimination of Existing Businesses Within the State:

The cumulative effects of the changes statewide are expected to be neutral to the creation or elimination of businesses in California. No significant changes in total fishing effort and recreational fishing expenditures to businesses are expected as a direct result of the proposed regulation changes.

(c) Effects of the Regulation on the Expansion of Businesses Currently Doing Business Within the State:

The cumulative effects of the changes statewide are expected to be neutral to expansion of businesses currently doing business within the state. No significant changes in total fishing effort and recreational fishing expenditures to businesses are expected as a direct result of the proposed regulation changes.

(d) Benefits of the Regulation to the Health and Welfare of California Residents:

Providing sustainable fishing opportunities encourages recreation, which can have a positive impact on the health and welfare of California residents.

(e) Benefits of the Regulation to Worker Safety

The Commission does not anticipate impacts to worker safety from the proposed regulations.

(f) Benefits of the Regulation to the State’s Environment

It is the policy of this state to encourage the conservation, sustainable use, and where feasible, restoration of California’s marine living resources for the benefit of all citizens of the state (Section 7050, Fish and Game Code). Benefits of the proposed management actions include preserving fishing opportunity, along with the continuation of the reasonable and sustainable management of barred sand bass resources.

Informative Digest/Policy Statement Overview

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations (CCR).

The barred sand bass fishery is a historic recreational fishery in southern California that is open year-round and managed collectively with kelp bass and spotted sand bass. Current regulations include a five-fish bag limit (in any combination of the three species) and a minimum size limit of 14 inches (35.6 centimeters); these were established in 2013 due to concerns about the status of kelp bass and barred sand bass stocks. While no formal stock assessment exists for barred sand bass, abundance estimates, based on fishery independent data, suggest a severely depressed population in southern California. The presumed decline is likely due to a combination of environmental conditions, poor recruitment, and fishing pressure on easily targeted spawning aggregations.

In consultation with fishing industry representatives, fishery researchers, and stakeholders, and with guidance from the Commission's Marine Resources Committee (MRC), the Department proposes modifications to Title 14, Section 28.30. Proposed language in 28.30, intended to limit take and possession of barred sand bass, includes a range of options for a sub-bag and possession limit for barred sand bass within the overall five-fish combined limit for kelp bass, barred sand bass and spotted sand bass, to be decided through the Commission public noticing process. The options are a range of bag and possession limits of 0-5 barred sand bass, varying seasonally, with a sunset provision ending June 1, 2028. This sunset provision allows for conservation of barred sand bass while the Department works with stakeholders on further reviewing data and developing models to evaluate potential future regulations that will help increase and sustain the barred sand bass population and support public fishing opportunities. The proposed regulation amendment is intended to reduce the overall number of barred sand bass taken by the fishery, specifically during the spawning months when barred sand bass are most vulnerable to fishing.

The proposed changes are as follows:

Subsection 28.30(b) is proposed to be amended to specify bag limit changes to one species, barred sand bass, within the salt water basses complex. This amendment is necessary to further protect barred sand bass spawning aggregations.

Add subsection (c)(1) which would create a limit within the spawning season on barred sand bass (June 1 through August 31) and (c)(2) which would create a limit during all other months. The square brackets indicate a range within which a final number will determined by the Commission. Add subsection (d) which would provide for a sunset provision for subsection (c), repealing it as of June 1, 2028.

The subsections would read as follows:

<u>(c) Barred Sand Bass Limit: Notwithstanding subsection (b);</u>

<u>(1) From June 1-August 31 a maximum of [0-5] barred sand bass may be taken or possessed.</u>

<u>(2) From September 1-May 31 a maximum of [1-5] barred sand bass may be taken or possessed.</u>

(d) Sunset Provision: Subsection (c) shall remain in effect until June 1, 2028, and as of that date is repealed.

Benefit of the Regulations:

The Commission anticipates benefits to the State's environment by sustainably managing California's ocean resources. The barred sand bass population would benefit from reduced fishing effort during their spawning season when they are most susceptible to fishing, which ultimately supports a more sustainable fishery in the long term. The adoption of scientifically based limits provides for the maintenance of sufficient populations of barred sand bass to ensure their continued existence for the environment and for the businesses that rely on recreational barred sand bass fishing.

Consistency and Compatibility with Existing Regulations:

Article IV, Section 20 of the State Constitution specifies that the Legislature may delegate to the Commission such powers related to the protection and propagation of fish and game as the Legislature sees fit. The Legislature has delegated authority to the Commission to promulgate recreational fishing regulations (Fish and Game Code sections 200 and 205). Commission staff has searched the California Code of Regulations and has found no other state regulations that address the recreational take of barred sand bass. The Commission has reviewed its own regulations and finds that the proposed regulations are consistent with other recreational fishing regulations in Title 14, CCR, and therefore finds that the proposed regulations are neither inconsistent nor incompatible with existing state regulation.

Proposed Regulatory Language

Section 28.30, Title 14, California Code of Regulations is amended as follows:

§ 28.30. Kelp Bass, Barred Sand Bass and Spotted Sand Bass.

(a) Minimum size: Fourteen inches total length or ten inches alternate length.

(b) Limit: Five in any combination of species, except as provided in subsection (c).

(c) Barred Sand Bass Limit: Notwithstanding subsection (b)

(1) From June 1-August 31 a maximum of [0-5] barred sand bass may be taken or possessed.

(2) From September 1-May 31 a maximum of [1-5] barred sand bass may be taken or possessed.

(d) Sunset Provision: Subsection (c) shall remain in effect until June 1, 2028, and as of that date is repealed.

NOTE: Authority cited: Sections 200, 205, 219, 265 and 275, Fish and Game Code. Reference: Sections 110, 200, 205, 219, 255, 265, 270 and 275, Fish and Game Code.

STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

ECONOMIC IMPACT STATEMENT

DEPARTMENT NAME	CONTACT PERSON	EMAIL ADDRESS	TELEPHONE NUMBER
Fish and Game Commission	David Thesell	fgc@fgc.ca.gov	916 201-6201

DESCRIPTIVE TITLE FROM NOTICE REGISTER OR FORM 400	NOTICE FILE NUMBER
Amend Section 28.30, CCR, Title 14, Re: Recreational Take of Barred Sand Bass	Z

A. ESTIMATED PRIVATE SECTOR COST IMPACTS *Include calculations and assumptions in the rulemaking record.*

1. Check the appropriate box(es) below to indicate whether this regulation:

- ☐ a. Impacts business and/or employees
- ☐ b. Impacts small businesses
- ☐ c. Impacts jobs or occupations
- ☐ d. Impacts California competitiveness
- ☐ e. Imposes reporting requirements
- ☐ f. Imposes prescriptive instead of performance
- ☐ g. Impacts individuals
- ☒ h. None of the above (Explain below):

These changes are not expected to be substantial due to the fishery being kept open and from the sufficient substitutability of kelp bass, see addend.

If any box in Items 1 a through g is checked, complete this Economic Impact Statement.
If box in Item 1.h. is checked, complete the Fiscal Impact Statement as appropriate.

2. The California Fish and Game Commission (Agency/Department) estimates that the economic impact of this regulation (which includes the fiscal impact) is:

- ☒ Below $10 million
- ☐ Between $10 and $25 million
- ☐ Between $25 and $50 million
- ☐ Over $50 million *[If the economic impact is over $50 million, agencies are required to submit a Standardized Regulatory Impact Assessment as specified in Government Code Section 11346.3(c)]*

3. Enter the total number of businesses impacted: _____

Describe the types of businesses (Include nonprofits): _____

Enter the number or percentage of total businesses impacted that are small businesses: _____

4. Enter the number of businesses that will be created: _____ eliminated: _____

Explain: _____

5. Indicate the geographic extent of impacts: ☐ Statewide

☐ Local or regional (List areas): _____

6. Enter the number of jobs created: _____ and eliminated: _____

Describe the types of jobs or occupations impacted: _____

7. Will the regulation affect the ability of California businesses to compete with other states by making it more costly to produce goods or services here? ☐ YES ☐ NO

If YES, explain briefly: _____

STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

ECONOMIC IMPACT STATEMENT (CONTINUED)

B. ESTIMATED COSTS *Include calculations and assumptions in the rulemaking record.*

1. What are the total statewide dollar costs that businesses and individuals may incur to comply with this regulation over its lifetime? $ _____

   a. Initial costs for a small business: $ _____ Annual ongoing costs: $ _____ Years: _____

   b. Initial costs for a typical business: $ _____ Annual ongoing costs: $ _____ Years: _____

   c. Initial costs for an individual: $ _____ Annual ongoing costs: $ _____ Years: _____

   d. Describe other economic costs that may occur: _____

2. If multiple industries are impacted, enter the share of total costs for each industry: _____

3. If the regulation imposes reporting requirements, enter the annual costs a typical business may incur to comply with these requirements. *Include the dollar costs to do programming, record keeping, reporting, and other paperwork, whether or not the paperwork must be submitted.* $ _____

4. Will this regulation directly impact housing costs? ☐ YES ☐ NO

   If YES, enter the annual dollar cost per housing unit: $ _____

   Number of units: _____

5. Are there comparable Federal regulations? ☐ YES ☐ NO

   Explain the need for State regulation given the existence or absence of Federal regulations: _____

   Enter any additional costs to businesses and/or individuals that may be due to State - Federal differences: $ _____

C. ESTIMATED BENEFITS *Estimation of the dollar value of benefits is not specifically required by rulemaking law, but encouraged.*

1. Briefly summarize the benefits of the regulation, which may include among others, the health and welfare of California residents, worker safety and the State's environment: _____

2. Are the benefits the result of: ☐ specific statutory requirements, or ☐ goals developed by the agency based on broad statutory authority?

   Explain: _____

3. What are the total statewide benefits from this regulation over its lifetime? $ _____

4. Briefly describe any expansion of businesses currently doing business within the State of California that would result from this regulation: _____

D. ALTERNATIVES TO THE REGULATION *Include calculations and assumptions in the rulemaking record. Estimation of the dollar value of benefits is not specifically required by rulemaking law, but encouraged.*

1. List alternatives considered and describe them below. If no alternatives were considered, explain why not: _____

STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

ECONOMIC IMPACT STATEMENT (CONTINUED)

2. Summarize the total statewide costs and benefits from this regulation and each alternative considered:

   Regulation: Benefit: $ _____ Cost: $ _____

   Alternative 1: Benefit: $ _____ Cost: $ _____

   Alternative 2: Benefit: $ _____ Cost: $ _____

3. Briefly discuss any quantification issues that are relevant to a comparison of estimated costs and benefits for this regulation or alternatives: _____

4. Rulemaking law requires agencies to consider performance standards as an alternative, if a regulation mandates the use of specific technologies or equipment, or prescribes specific actions or procedures. Were performance standards considered to lower compliance costs? ☐ YES ☐ NO

   Explain: _____

E. MAJOR REGULATIONS *Include calculations and assumptions in the rulemaking record.*

California Environmental Protection Agency (Cal/EPA) boards, offices and departments are required to submit the following (per Health and Safety Code section 57005). Otherwise, skip to E4.

1. Will the estimated costs of this regulation to California business enterprises **exceed $10 million**? ☐ YES ☐ NO

If YES, complete E2. and E3
If NO, skip to E4

2. Briefly describe each alternative, or combination of alternatives, for which a cost-effectiveness analysis was performed:

   Alternative 1: _____

   Alternative 2: _____

   (Attach additional pages for other alternatives)

3. For the regulation, and each alternative just described, enter the estimated total cost and overall cost-effectiveness ratio:

   Regulation: Total Cost $ _____ Cost-effectiveness ratio: $ _____

   Alternative 1: Total Cost $ _____ Cost-effectiveness ratio: $ _____

   Alternative 2: Total Cost $ _____ Cost-effectiveness ratio: $ _____

4. Will the regulation subject to OAL review have an estimated economic impact to business enterprises and individuals located in or doing business in California exceeding $50 million in any 12-month period between the date the major regulation is estimated to be filed with the Secretary of State through12 months after the major regulation is estimated to be fully implemented?

   ☐ YES ☒ NO

   If YES, agencies are required to submit a Standardized Regulatory Impact Assessment (SRIA) as specified in Government Code Section 11346.3(c) and to include the SRIA in the Initial Statement of Reasons.

5. Briefly describe the following:

   The increase or decrease of investment in the State: _____

   The incentive for innovation in products, materials or processes: _____

   The benefits of the regulations, including, but not limited to, benefits to the health, safety, and welfare of California residents, worker safety, and the state's environment and quality of life, among any other benefits identified by the agency: _____

STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

FISCAL IMPACT STATEMENT

A. FISCAL EFFECT ON LOCAL GOVERNMENT *Indicate appropriate boxes 1 through 6 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year which are reimbursable by the State. (Approximate)
(Pursuant to Section 6 of Article XIII B of the California Constitution and Sections 17500 et seq. of the Government Code).

$ _____

☐ a. Funding provided in _____

Budget Act of _____ or Chapter _____ , Statutes of _____

☐ b. Funding will be requested in the Governor's Budget Act of _____

Fiscal Year: _____

☐ 2. Additional expenditures in the current State Fiscal Year which are NOT reimbursable by the State. (Approximate)
(Pursuant to Section 6 of Article XIII B of the California Constitution and Sections 17500 et seq. of the Government Code).

$ _____

Check reason(s) this regulation is not reimbursable and provide the appropriate information:

☐ a. Implements the Federal mandate contained in _____

☐ b. Implements the court mandate set forth by the _____ Court.

Case of: _____ vs. _____

☐ c. Implements a mandate of the people of this State expressed in their approval of Proposition No. _____

Date of Election: _____

☐ d. Issued only in response to a specific request from affected local entity(s).

Local entity(s) affected: _____

_____

☐ e. Will be fully financed from the fees, revenue, etc. from: _____

Authorized by Section: _____ of the _____ Code;

☐ f. Provides for savings to each affected unit of local government which will, at a minimum, offset any additional costs to each;

☐ g. Creates, eliminates, or changes the penalty for a new crime or infraction contained in _____

☐ 3. Annual Savings. (approximate)

$ _____

☐ 4. No additional costs or savings. This regulation makes only technical, non-substantive or clarifying changes to current law regulations.

☒ 5. No fiscal impact exists. This regulation does not affect any local entity or program.

☐ 6. Other. Explain _____

_____

FISCAL IMPACT STATEMENT (CONTINUED)

B. FISCAL EFFECT ON STATE GOVERNMENT *Indicate appropriate boxes 1 through 4 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year. (Approximate)

$ _____

It is anticipated that State agencies will:

☐ a. Absorb these additional costs within their existing budgets and resources.

☐ b. Increase the currently authorized budget level for the _____ Fiscal Year

☐ 2. Savings in the current State Fiscal Year. (Approximate)

$ _____

☒ 3. No fiscal impact exists. This regulation does not affect any State agency or program.

☐ 4. Other. Explain _____

_____

C. FISCAL EFFECT ON FEDERAL FUNDING OF STATE PROGRAMS *Indicate appropriate boxes 1 through 4 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year. (Approximate)

$ _____

☐ 2. Savings in the current State Fiscal Year. (Approximate)

$ _____

☒ 3. No fiscal impact exists. This regulation does not affect any federally funded State agency or program.

☐ 4. Other. Explain _____

_____

FISCAL OFFICER SIGNATURE	DATE
DocuSigned by: Dan Reagan 6558B761E2D347D...	1/10/2025

The signature attests that the agency has completed the STD. 399 according to the instructions in SAM sections 6601-6616, and understands the impacts of the proposed rulemaking. State boards, offices, or departments not under an Agency Secretary must have the form signed by the highest ranking official in the organization.

AGENCY SECRETARY	DATE
Melissa A. Miller-Henson Bryan Cash 1/13/2025	1/9/2025

Finance approval and signature is required when SAM sections 6601-6616 require completion of Fiscal Impact Statement in the STD. 399.

DEPARTMENT OF FINANCE PROGRAM BUDGET MANAGER	DATE

STD. 399 Addendum

Amend Section 28.30 of Title 14, California Code of Regulations, Regarding Barred Sand Bass Limit

Background

The barred sand bass fishery is an historic recreational fishery in southern California that is open year-round and managed collectively with two other saltwater bass species, kelp bass and spotted sand bass; there is no commercial fishery for barred sand bass. For decades, barred sand bass (*Paralabrax nebulifer*) ranked as one of the most commonly caught and retained marine sport fishes in southern California. From the 1990s through the early 2000s, annual landings exceeding 500,000 barred sand bass was not uncommon from commercial passenger sport fishing vessels (CPFVs). Barred sand bass form large spawning aggregations in the summer months (June through August), and CPFVs and private fishing boats target these aggregations, as this is when the fish are easily found and caught. CPFV landings declined in the late 2000s and have remained under 30,000 landed fish annually since 2016.

In 2013, the California Fish and Game Commission adopted regulations that decreased the bag limit to five in aggregate of the three saltwater bass species (*Paralabrax sp.*) commonly occurring in California, and increased the minimum size limit to 14 inches; however, the stock of barred sand bass has shown little signs of recovery as a result of the changes. The lack of recovery could be due to several factors, including continued fishing pressure during summer months when barred sand bass form spawning aggregations — when the majority of this fishery's activities take place — and intermittent recruitment of young-of-the-year. The currently-proposed regulatory amendments are intended to allow the recovery of barred sand bass by reducing the number of barred sand bass that individual fishers can harvest, with the goal of reducing overall harvest numbers, and by reducing fishing effort during the spawning season when the fish are most susceptible to fishing pressure.

Recreational Fishery Economics Overview

Recreational sand bass fishery activities are comprised of individual angler trips and CPFVs providing boat trips to groups of anglers. Both fishing modes involve travel and other associated expenditures on goods and services. The economic impact of regulatory changes on recreational fisheries is estimated by tracking resulting changes in expenditures corresponding with changes in fishing effort, angler trips, and length of stay in the fishery areas. Distance traveled affects gas and other travel expenditures. Daytrips and overnight trips involve different levels of spending for gas, food, and accommodations at area businesses as well as different levels of sales tax impacts. Direct expenditures ripple through the economy, as receiving businesses buy intermediate goods from suppliers that then spend that revenue again. Business spending on wages is received by workers who then spend that income, some of which goes to local businesses. Recreational fisheries spending thus multiplies throughout the economy with the indirect and induced effects of the initial direct expenditure.

Additionally, if fishing trips shift from months proposed for closure to the remaining open months, and/or shift toward other available species, then the total recreational angler days and associated expenditures could be partially offset; these kinds of shifts have been seen in other fisheries with similar opportunities. A shift toward the remaining open months and/or the pursuit of other species is difficult to estimate due to data limitations, but these responses are expected to partially mitigate the impact of changes in opportunity[1]. Thus, due to the likelihood of shifts to other months and available species, the proposed amendments are anticipated to maintain sufficient opportunity to not induce significant adverse economic impact to the state.

Current Regulations

Current regulations governing barred sand bass are:

- Section 28.30 defines a minimum size and a limit (daily bag and possession limit for an individual) for kelp bass, barred sand bass, and spotted sand bass, combined, for recreational fishers. Subsection (a) specifies that the minimum size for the three species is 14 inches total length or 10 inches alternate length. Subsection (b) specifies that the bag and possession limit for sand bass is five in any combination of the three bass species.
- Section 27.65, subsection (b)(1), specifies fillet requirements on fishing vessels for kelp bass, barred sand bass, and spotted sand bass. Each fillet must be a minimum of 7 1/2 inches in length and bear intact a 1-inch square patch of skin.

Proposed Regulations

The proposed regulations would amend subsection 28.30(b) to specify a sub-bag and possession limit for one of the three species within the saltwater bass complex, barred sand bass. The amendment is necessary to reduce overall harvest and protect barred sand bass spawning aggregations that are susceptible to harvest.

The Commission's Marine Resources Committee recommended options for the Commission to consider for amending the bag/possession limit by time of year. Under the proposed regulations, the bag/possession limit would remain five in any combination of the three species, except as provided in a new subsection (c) specific to barred sand bass to create a sub-bag/possession limit:

- Subsection (c)(1) would create a sub-limit within the spawning season (June 1 through August 31) of [0-5] fish, and
- Subsection (c)(2) would create a sub-limit during all other months (September through May) of [1-5] fish.

The square brackets for sub-bag/possession limits indicate a range to be determined by the Commission during the rulemaking process. The addition of subsection (d) establishes a June 1, 2028 sunset date for subsection (c).

---

[1] Pacific Coast Groundfish Fishery 2023-2024 Harvest Specifications and Management Measures, April 2022, (see pp. 7-3 to 7-5), https://www.pcouncil.org/documents/2022/03/f-4-attachment-2-2023-2024-management-measure-analytical-document-electronic-only.pdf/.

Economic Impact Statement

A. Estimated Private Sector Cost Impacts

Answer 1. What are the total statewide dollar costs that businesses and individuals may incur to comply with this regulation over its lifetime? h. None of the above.

As described in the direct and indirect cost sections, these regulations will not necessarily impose a new cost on fishers and related businesses.

While the potential for a reduction in opportunity for this popular marine fishery could result in reduced sport fishing expenditures in some sectors, these proposed regulations are not expected to reduce opportunities because the Commission is expected to allow some barred sand bass fishing to continue, at the very least outside the spawning season, and because of the substitutability of kelp bass as a targeted species (spotted sand bass does not represent as equal a substitution as kelp bass). A reduction in "opportunity" refers to a reduction in areas open for fishing and may not translate directly to a corresponding reduction in fishing trips. Trips vary by mode and primarily involve private boats or chartered boats, such as CPFVs. Though they are less popular than kelp bass for consumption and sport, barred sand bass are easy for novice anglers to target with hook and line during spawning aggregations; hence, they have been a reliable species for CPFVs hoping to give less experienced anglers a chance to catch a fish (Love et al. 1996a; Erisman et al. 2011).

The proposed regulations introduce a sub-limit of [0-5] fish within the spawning period of June 1-August 31 and a sub-limit of [1-5] within the remaining period of September 1-May 31. However, these sub-limits would not completely close off the barred sand bass recreational fishery and reduce opportunities for fishers, as they would still be able to reach the overall limit of 5 saltwater basses using either barred sand bass, kelp bass, or spotted sand bass. It should be noted that kelp bass represents the most suitable substitute for barred sand bass given their popularity as a sport fish and the areas where they can be fished, while spotted sand bass are primarily found in bays and estuaries that are not typically accessed by CPFVs.

Direct Costs

The proposed regulatory amendment to Section 28.30 will impose some form of sub-limit on barred sand bass. However, kelp bass are still able to be fished and are considered to be appropriate substitute species with little to no difference in bait requirements, and the overall limit for the three saltwater basses in combination remains unchanged.

Indirect Costs

Indirect costs are not expected to be incurred in the adjustment period. Due to the likelihood of timing shifts and shifts to other available species, the proposed amendments are anticipated to maintain sufficient opportunity to not induce significant adverse direct or indirect economic impacts to the state. The shifts will not affect the business decisions of bait sellers who typically sell sardines instead of anchovies, which are the preferred bait for saltwater bass species. Sardines are less costly to procure due

to only requiring a few hours to resupply, versus the nearly 12 hours it takes to resupply anchovies, which gives anchovies a higher total labor cost to procure.

Fiscal Impact Statement

A. Fiscal Effect on Local Government

Answer: 5. No fiscal impact.

The Department anticipates that the proposed regulatory action will have no fiscal effect on any local government entity or program.

B. Fiscal Effect on State Government

Answer: 3. No fiscal impact.

The Department anticipates that the proposed regulatory action will have no fiscal effect on state government. The Commission has determined that the proposed regulatory action will not affect license revenue or the Department's existing level of monitoring and enforcement activities. Additionally, no other state agencies or programs would be affected by this regulatory action.

C. Fiscal Effect on Federal Funding of State Programs

Answer: 3. No fiscal impact.

The proposed regulatory action will not have a fiscal effect on federal funding of state programs.

Adoption: Regulation Change Considerations for Barred Sand Bass

Photo Credit CDFW Staff

17 April 2025

Presented to:

CA Fish & Game Commission

Presented by:

Armand Barilotti

Environmental Scientist
CDFW Marine Region

Where We've Been

February 2024	• CDFW presentation and discussion with fishing industry (remote). • CDFW presentation and discussion with BSB researchers (remote).
April 2024	• CDFW presentation and discussion with fishing industry (remote).
July 2024	• Marine Resources Committee meeting with CDFW presentation. • Tribal notification (letter).
September 2024	• BSB Working Group meeting hosted by CDFW with fishing industry, BSB researchers, and FGC staff (hybrid).
October 2024	• BSB Working Group update meeting (remote).
November 2024	• Marine Resources Committee meeting with CDFW presentation.
December 2024	• Fish and Game Commission Notice Hearing with CDFW presentation.
February 2025	• Fish and Game Commission Discussion Hearing. • Two meetings with industry for research and data needs (Feb. & March).
April 2025	• Fish and Game Commission Adoption Hearing with CDFW presentation. • Presentation of data discussed highlighting differing opinions.

Data and Research for Barred Sand Bass

- Tagging studies (acoustic and spaghetti tags):
  - 1960s, 1990s, 2013, and 2015
- Larval/juvenile recruitment data
- Availability of prey sources
- Mexican commercial fishery
- CDFW dive surveys 2017-2024
- CDFW discard study 2013-2024
- CPFV Catch per Unit Effort and Landings 1980-2024

Provisional Sunset Regulation Options

BSB bag limit options	% BSB saved*	# BSB saved*
4 June-Aug, 5 Sept-May	3.4%	1,880
4 year-round	3.6%	1,990
3 June-Aug, 5 Sept-May	10.5%	5,836
3 June-Aug, 4 Sept-May	10.7%	5,946
3 year-round	11.2%	6,227
2 June-Aug, 5 Sept-May	21.6%	11,941
2 June-Aug, 4 Sept-May	21.8%	12,051
2 June-Aug, 3 Sept-May	22.3%	12,332
2 year-round	23.5%	13,017
1 June-Aug, 5 Sept-May	38.9%	21,563
1 June-Aug, 4 Sept-May	39.1%	21,673
1 June-Aug, 3 Sept-May	39.6%	21,954
1 June-Aug, 2 Sept-May	40.9%	22,639
1 year-round	44.9%	24,868
0 June-Aug, 5 Sept-May	74.1%	41,075
0 June-Aug, 4 Sept-May	74.3%	41,185
0 June-Aug, 3 Sept-May	74.8%	41,466
0 June-Aug, 2 Sept-May (original proposal)	76.1%	42,151
0 June-Aug, 1 Sept-May	80.1%	44,380

*based on 2023 landings

CDFW MLS 2025

Moving Forward

April 2025	• Fish and Game Commission Adoption hearing with CDFW presentation. • Adopt new BSB regulation(s).
June 2025	• New regulation implemented with a 3-year sunset date.
Spring/Summer 2025	• Reconvene BSB Working Group with focus on research and data needs for stock assessment and Management Strategy Evaluation (MSE).
2025 - 2028	• Collect data identified for use in the stock assessment and MSE. • CDFW staff conduct stock assessment & MSE with BSB Working Group.

4 data types identified to collaboratively fill BSB life history gaps or make current data more robust for stock assessment.

- Age structure.
- Maturity and fecundity.
- Release data.
- Movement and migration with natural tagging.

Thank You

Armand Barilotti
Environmental Scientist
Southern California Fisheries Research and Management Project
Department of Fish and Wildlife
Marine Region
Email: AskMarine@Wildlife.ca.gov

Enhanced Status Report:
https://marinespecies.wildlife.ca.gov/barred-sand-bass/true/

State of California
Department of Fish and Wildlife

Signed Original on File
Received April 8, 2025

Memorandum

Date: April 4, 2025

To: Melissa Miller-Henson
Executive Director
Fish and Game Commission

From: Charlton H. Bonham
Director

Subject: **Submission of Pre-adoption Statement of Reasons for the April 16-17, 2025, Fish and Game Commission meeting to Amend Section 28.30 to Title 14, California Code of Regulations, Re: Barred Sand Bass Limit**

Please find attached the Pre-adoption Statement of Reasons to amend Section 28.30, Title 14, California Code of Regulations. The proposed addition aims to limit take and possession of barred sand bass. The options are a range of bag and possession limits of 1-5 barred sand bass and 0-5 barred sand bass during the summer spawning season until June 1, 2028, and as of that date is repealed unless a later enacted amendment deletes or extends that date. Once the final bag and possession limit(s) are determined and adopted at the April 16-17, 2025 meeting the California Department of Fish and Wildlife (Department) requests that the California Fish and Game Commission seek a June 1, 2025, effective date for the regulations. The proposed management measures are necessary to address the lack of recovery in barred sand bass populations, especially during their spawning seasons when they are most susceptible to fishing.

If you have any questions or need additional information, please contact Dr. Craig Shuman, Marine Regional Manager at R7RegionalMgr@wildlife.ca.gov. The Department point of contact for this regulation should identify Environmental Scientist Armand Barilotti.

ec: **California Department of Fish and Wildlife**

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State of California
Fish and Game Commission
Pre-Adoption Statement of Reasons for Regulatory Action

Amend Section 28.30
Title 14, California Code of Regulations
Re: Barred Sand Bass Limit

I. Date of Initial Statement of Reasons: December 11, 2024

II. Date of Pre-Adoption Statement of Reasons: March 18, 2025

III. Dates and Locations of Scheduled Hearings

(a) Notice Hearing

Date: December 11, 2024 Location: Sacramento

(b) Discussion Hearing

Date: February 12-13, 2025 Location: Sacramento

(c) Adoption Hearing

Date: April 16-17, 2025 Location: Sacramento

IV. Description of Modification of Originally Proposed Language of Initial Statement of Reasons (ISOR)

As originally stated in the Initial Statement of Reasons (ISOR), the proposed language in Section 28.30 includes a range of options for a sub-bag and possession limit for barred sand bass within the overall five-fish combined limit for kelp bass, barred sand bass and spotted sand bass, to be decided through the Fish and Game Commission (Commission) public noticing process. The options are a range of bag and possession limits of 1-5 barred sand bass and 0-5 barred sand bass during the summer spawning season, with a sunset provision ending June 1, 2028. As stated in the Commission's Marine Resources Committee (MRC) meeting held on November 7, 2024, the Department of Fish and Wildlife (Department) recommends developing an interim regulation of a year-round sub-bag limit of four barred sand bass, with no more than five bass in combination, with a sunset date after three years, while the Department continues to work with stakeholders to fill priority research gaps and develop a long-term conservation strategy based on best available science to protect barred sand bass spawning aggregations

V. Reasons for Modification of Originally Proposed Language of ISOR:

The Commission did not take action upon the proposed regulations during the February Discussion Hearing, therefore, no changes have been made to the originally proposed regulatory language.

VI. Summary of Primary Considerations Raised in Opposition and in Support

Please see Attachment 1, Responses to Public comments received through March 17, 2025.

Updated Informative Digest/Policy Statement Overview

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations (CCR).

The barred sand bass fishery is a historic recreational fishery in southern California that is open year-round and managed collectively with kelp bass and spotted sand bass. Current regulations include a five-fish bag limit (in any combination of the three species) and a minimum size limit of 14 inches (35.6 centimeters); these were established in 2013 due to concerns about the status of kelp bass and barred sand bass stocks. While no formal stock assessment exists for barred sand bass, abundance estimates, based on fishery independent data, suggest a severely depressed population in southern California. The presumed decline is likely due to a combination of environmental conditions, poor recruitment, and fishing pressure on easily targeted spawning aggregations.

In consultation with fishing industry representatives, fishery researchers, and stakeholders, and with guidance from the Commission's MRC, the Department proposes modifications to Title 14, Section 28.30. Proposed language in 28.30, intended to limit take and possession of barred sand bass, includes a range of options for a sub-bag and possession limit for barred sand bass within the overall five-fish combined limit for kelp bass, barred sand bass and spotted sand bass, to be decided through the Commission public noticing process. The options are a range of bag and possession limits of 1-5 barred sand bass and 0-5 barred sand bass during the summer spawning season, with a sunset provision ending June 1, 2028. This sunset provision allows for conservation of barred sand bass while the Department works with stakeholders on further reviewing data and developing models to evaluate potential future regulations that will help increase and sustain the barred sand bass population and support public fishing opportunities. The proposed regulation amendment is intended to reduce the overall number of barred sand bass taken by the fishery, specifically during the spawning months when barred sand bass are most vulnerable to fishing.

The proposed changes are as follows: Subsection 28.30(b) is proposed to be amended to specify bag limit changes to one species, barred sand bass, within the saltwater bass complex. This amendment is necessary to further protect barred sand bass spawning aggregations.

Add subsection (c)(1) which would create a limit within the spawning season on barred sand bass (June 1 through August 31) and (c)(2) which would create a limit during all other months. The square brackets indicate a range within which a final number will be determined by the Commission. Add subsection (d) which would provide for a sunset provision for subsection (c), repealing it as of June 1, 2028.

The subsections would read as follows:

(c) Barred Sand Bass Limit: Notwithstanding subsection (b);

(1) From June 1-August 31 a maximum of [0-5] barred sand bass may be taken or possessed.

(2) From September 1-May 31 a maximum of [1-5] barred sand bass may be taken or possessed.

(d) Sunset Provision: Subsection (c) shall remain in effect until June 1, 2028, and as of that date is repealed.

Benefit of the Regulations:

The Commission anticipates benefits to the State's environment by sustainably managing California's ocean resources. The barred sand bass population would benefit from reduced fishing effort during

their spawning season when they are most susceptible to fishing, which ultimately supports a more sustainable fishery in the long term. The adoption of scientifically based limits provides for the maintenance of sufficient populations of barred sand bass to ensure their continued existence for the environment and for the businesses that rely on recreational barred sand bass fishing.

Consistency and Compatibility with Existing Regulations:

Article IV, Section 20 of the State Constitution specifies that the Legislature may delegate to the Commission such powers related to the protection and propagation of fish and game as the Legislature sees fit. The Legislature has delegated authority to the Commission to promulgate recreational fishing regulations (Fish and Game Code sections 200 and 205). Commission staff have searched the California Code of Regulations and has found no other state regulations that address the recreational take of barred sand bass. The Commission has reviewed its own regulations and finds that the proposed regulations are consistent with other recreational fishing regulations in Title 14, CCR, and therefore finds that the proposed regulations are neither inconsistent nor incompatible with existing state regulation.

UPDATE

The Commission did not take action upon the proposed regulations during the February Discussion Hearing, therefore, no changes have been made to the originally proposed regulatory language. As stated in the MRC meeting held on November 7, 2024, the Department recommends developing an interim regulation of a year-round bag limit of four barred sand bass, with no more than five bass in combination, with a sunset date after three years, while the Department continues to work with stakeholders to fill priority research gaps and develop a long-term conservation strategy based on best available science to protect barred sand bass spawning aggregations The Commission will take action on this rulemaking during the April Adoption Hearing.

Attachment 1 – Pre-adoption Statement of Reasons

28.30– Responses to Public Comments: Barred Sand Bass Limit

Responses to written comments (1-22) received up to March 17, 2025, and to oral comments (23-71) received at the February 13, 2025, Fish and Game Commission meeting.

List of acronyms: BSB = barred sand bass; CPFV = Commercial Passenger Fishing Vessel; CPUE = Catch per unit effort; CRFS = California Recreational Fisheries Survey; Department = California Department of Fish and Wildlife; ESR = Enhanced Status Report; ISOR = Initial Statement of Reasons; MSE = Management Strategy Evaluation; RecFIN = Recreational Fisheries Information Network; SA = stock assessment; summertime – months of June, July, August.

Comment #, Name, affiliation & date	Comment Summary	California Department of Fish and Wildlife (Department) Response
1. Rick Maurer, 1/21/2025	1-a. From 50 years of personal diving experience in Santa Monica Bay, no shortage of BSB; observes large school ranging in size from 12-24 inches and larger. BSB are the most prevalent gamefish on artificial reefs.	1-a. Comment noted. Additionally, the Department performs scuba surveys to count and size BSB during the fall months, and two of the sites are within Santa Monica Bay. The results of this ongoing study can be found in the meeting materials from the Marine Resources Committee meetings in July and November 2024 and the Notice hearing in December 2024.
	1-b. BSB should not be on the endangered list.	1-b. BSB are not endangered nor are they being considered for the endangered species list.
	1-c. Consider postponing making a regulation change decision until further study.	1-c. This regulation package is not going to be delayed as the Commission deems there is sufficient information available to make an informed decision about the health of the BSB population and fishery.
2. Tim Carpenter, 1/26/2025	2-a. Opposed to BSB and kelp bass regulation changes being proposed at Discussion Hearing, which should be delayed until the necessary data is	2-a. Please see response 1-c.

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	collected, analyzed, and made available for public review.	
	2-b. Supports all fishing regulations that promote fishery sustainability.	2-b. Comment noted.
	2-c. Wants to see the data collected and/or scientific analysis results supporting proposed regulation changes.	2-c. The BSB fishery data and scientific research used in this regulatory package can be found in the meeting materials from the Marine Resources Committee meetings in July and November 2024 and the Notice hearing in December 2024. More information about BSB can be found in the ESR for BSB on the Department's website.
	2-d. Perception of declined catch rates alone does not justify proposed regulation changes.	2-d. Catch rates are just one of the metrics that are used to evaluate the BSB fishery. Fishery-dependent data, fishery-independent data, and analyses published in peer reviewed scientific literature are used to evaluate this fishery. Some examples of these include: CPFV landings, landing estimates from RecFIN, effort, habitat preferences, movements and migrations, age and growth, larvae abundance, juvenile and adult BSB abundance and size distribution, and catch-and-release versus retention rates.
	2-e. Many anglers have shifted to other species, leading to the illusion of decline.	2-e. The Commission acknowledges that the offshore fishing for pelagic species like bluefin tuna, yellowfin tuna, dorado, and yellowtail has been exceptional for the past decade; however, the

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		southern California short range nearshore CPFVs and private boats are still fishing for BSB and other nearshore species. The nearshore fleet has had to change what nearshore fishes they target because the BSB spawning aggregations have been absent for nearly a decade, so they have been forced to fish for other species to make a catch. In 2023 and 2024, when BSB aggregations were present, the nearshore CPFV fleet focused their effort to target BSB. This leads the Commission to believe that when spawning aggregations of BSB are present, the short range nearshore CPFV fleet and private boats will focus their effort on targeting spawning BSB and will switch to target other species if these BSB spawning aggregations are not present.
	2-f. In 2013 FGC cut the daily bag limits by 50%.	2-f. Comment noted.
	2-g. No recent stock assessment has been performed.	2-g. The Commission acknowledges that no formal SA has been done for BSB. The Master Plan for Fisheries describes a scaled management approach that is applied to all fisheries and the overall management framework can range from an ESR to an ESR along with a complex fisheries management plan. BSB are managed with an ESR along with rulemaking on an as-needed basis. Abundance estimates suggest a severely depressed population in southern California. The

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	2-h. CDFW's report fails to acknowledge the migratory nature of the BSB populations.	presumed decline is likely due to a combination of environmental conditions, poor recruitment, and fishing pressure on easily targeted spawning aggregations. The Department is pursuing the idea of a formal SA conducted by Department staff, as well as using an Management Strategy Evaluation (MSE) for testing prospective management options. 2-h. The fishing industry has a hypothesis that BSB migrate hundreds of miles from southern and central Baja California, Mexico to southern California to spawn. This hypothesis comes from captains that have seen BSB spawning aggregations and have believed to have seen them migrating up the coast from southern and central Baja California, Mexico. Results from several acoustic and spaghetti tagging studies do not support this hypothesis. The acoustic tagging studies done in the 2010s, have shown BSB have a small home range where they spend most of the year. During the summer months, most of the tagged fish left their section of reef and were detected at local spawning aggregations. This is a migration of 10-30 miles. These BSB were then detected back at their home reefs after the spawning season. In the 1960s and 1990s, over 8,000 spaghetti tags were deployed into BSB. Recaptured spaghetti tagged BSB were either caught where they were initially tagged or at local

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		spawning aggregations. The average recapture distance was 18 km (±15 km) in the 1960s and 7 km (±9 km) in the 1990s. In the hypothesis from the fishing industry, BSB would be found to be moving among the aggregation sites, resulting in much larger recapture distances. However, this was not documented in these studies, so the Department believes BSB found at southern California spawning aggregations are from locally living BSB. The BSB that likely cross the US/Mexico border are those at the Imperial Beach/Tijuana aggregation site, since the aggregation site is partially in Mexican waters. It is still believed these BSB are sourced from the local area, not from central or southern Baja California, Mexico. The main contribution of Mexican BSB to southern California is thought to be through large sporadic larvae pulses. During warm water years, upwelling in northern Baja California is interrupted, which can allow for BSB larval transport into southern Californian waters.
	2-i. Fish counts do not accurately reflect population decline (e.g. many anglers practice catch-and-release of all BSB and KB).	2-i. The Department started a catch-and-release study starting in 2013 after the new regulations were implemented to look at the ratio of released to retained bass, both kelp bass and BSB. The results of this study finds that after the first year after the

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		regulation implementation that most basses were released. From 2014 to present about 50% of BSB are released and the other half are kept. This is a stark contrast to kelp bass where about 85% of kelp bass are released and the remaining 15% are kept. The Department also collects data on released fish from the surveys conducted by the California Recreational Fishery Survey (CRFS). Counts and sizes of released fish can be collected by onboard CPFV samplers, while counts of released fish are reported for other fishing modes, such as private/rental boats.
	2-j. Economically and physically disadvantaged anglers will be adversely affected.	2-j. BSB are not the only nearshore species available to CPFVs, private boats, and shore-based fishers to target. Since 2013, BSB have constituted less than 10% of the summertime landings for short range CPFVs, with most years in this range less than 5% of landings. There are a variety of easy to catch nearshore species for everyone to target besides BSB like kelp bass, California scorpionfish (aka sculpin), ocean whitefish, rockfishes, California sheephead, surfperches, croakers, etc.
	2-k. BSB serves as an introductory species for new saltwater anglers.	2-k. The Commission acknowledges that BSB is an easier saltwater fish to target for novice anglers. Especially during spawning aggregations, BSB are

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		voracious and will eat a variety of bait and artificial lure presentations. Part of becoming a responsible angler is learning to practice sustainable fishing practices. The goal of any regulatory package is to make the fishery more sustainable, which will allow for future generations to enjoy the fishery.
3. Chris Arechaederra, Coastal Conservation Association of California, 1/29/2025	3-a. CCA CAL represents the varied interests of CA ocean anglers and believes strong conservation can coexist with responsible, sustainable consumptive outdoor recreation. 3-b. CCA CAL leadership has worked with CDFW as a stakeholder for the BSB Working Group. 3-c. Catch rates of BSB alone are not sufficient to support a zero take of BSB from June 1 to Aug 31 put forth by some Commissioners at the Dec. 11, 2024, meeting. 3-d. Much angling effort has shifted over the past several summers to Southern CA's offshore species. Some CPFVs barely fished for BSB in 2021-2023. 3-e. Insufficient data were used to justify the creation of a no-take season. 3-f. Catch rates have declined for the past 12 years because of the 2013 bass (BSB, KB, SSB) regulation change.	3-a. Comment noted. 3-b. The Commission and Department acknowledge and thank CCA Cal leadership for past and continued partnership in the BSB working group. 3-c. See response 2-d. 3-d. See response 2-e. 3-e. The Department supports the proposed sub-bag limit of 4 BSB; however, the Department has used and presented a multitude of information to evaluate the BSB fishery and there is sufficient information that could support a seasonal closure if the deems it necessary. The information sources used to evaluate this fishery are from fishery-dependent data, fishery-independent data, and analyses published in peer reviewed scientific literature. Some of these include: CPFV landings, landing estimates from RecFIN, effort, habitat preferences, movements and migrations, age and growth, larvae abundance, juvenile and adult BSB

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	3-g. There has been no recent SA for BSB, so the true abundance of BSB is unknown and a maximum sustainable yield cannot be calculated. 3-h. CDFW's report fails to adequately acknowledge the migratory nature of BSB populations. BSB will stay in Mexico and not migrate north to spawn if the conditions are unfavorable and the migratory patterns are cyclical. 3-i. We need to assess the numbers of BSB that migrate back and forth across the US/Mexico border. 3-j. CPFV landings do not accurately reflect age structure and recruitment because juvenile BSB live in areas not fished by CPFVs, which will even actively avoid areas with many sub-legals. 3-k. Economically disadvantaged and underprivileged anglers will be disproportionately adversely affected, who often rely on BSB for subsistence; a zero-take season violates the principles of JEDI. 3-l. BSB serve as an introductory species for young anglers and a no-take season will deprive many of the opportunity to be introduced to a passion for fishing and love of the ocean. 3-m. Dismantling CDFW's recommendations and dismissing the working group's input discourages	abundance and size distribution, and catch-and-release versus retention rates. 3-f. This statement is incorrect based off the CPFV logbook landings and RecFIN landing estimates. The decline in landings and CPUE started in 2005, not 2013, and bottomed out in 2016. Spawning aggregations disappearing from southern California was the key reason why BSB landings declined. The Commission does acknowledge that the regulations implemented in 2013 may have contributed to the continued decline in landings since the bag limit was reduced by half and the size limit was increased by 2 inches. 3-g. See response 2-g. 3-h. See response 2-h. 3-i. The Department is going to be working with the BSB working group to determine which scientific studies can be accomplished before this regulation sunsets in 2028. One of the studies being considered is a natural tagging study that uses the microchemistry of the BSB otoliths to determine where they have lived and traveled. 3-j. Comment acknowledged that CPFVs do not fish in the habitat where BSB recruit. 3-k. See response 2-j.

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	future collaboration with stakeholders to reach agreement on issues.	3-l. See response 2-k. 3-m. Comment noted.
4. Bekki Vanderelst, Dana Wharf Lady Anglers, 1/29/2025	4-a. Opposed to establishing a no take season for BSB from June 1 to Aug 31. 4-b. Catch rates alone should not be used as a definitive indicator of population health. 4-c. Many have shifted effort focus to other species. 4-d. There has been no recent, comprehensive stock assessment. 4-e. The Department has failed to acknowledge the migratory behavior of barred sand bass. 4-f. A no take season would disproportionately affect disadvantaged and underprivileged anglers and tribal communities. 4-g. Collaboration between the Department and stakeholders can lead to more balanced and effective conservation solutions.	4-a. Comment noted. 4-b. See response 2-d. 4-c. See response 2-e. 4-d. See response 2-g. 4-e. See response 2-h. 4-f. See response 2-j. 4-g. Comment noted.
5. Laurie Davies, Assemblywoman, 74th District, 1/30/2025	5-a. Strongly opposed to any new restrictions on BSB fishing. 5-b. California's sport fishing industry is a major economic driver, job creator, and essential contributor; the coastal cities in her district (Dana Point, San Clemente, Oceanside, and others),	5-a. Comment noted. 5-b. The Commission acknowledges the importance of the sportfishing industry to the southern California economy. The BSB fishery is no longer the primary target of the southern Californian short range nearshore CPFV fleet, and

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	charter boat operators, tackle shops, and hospitality businesses all heavily rely on tourism, small business revenue, and local job creation sportfishing provides; any new restrictions to BSB fishing will harm the local economy and fishing community in her district. 5-c. Current regulations are effective; there are no proven conservation benefits to be gained from new restrictions.	conservation measures used to restrict the amount of BSB take should have minimal financial impacts to the CPFVs and sportfishing landings. In the 1990s and early 2000s, BSB made up 50% or more of the summertime landings of short range nearshore CPFVs in southern California; however, the summertime landings of BSB in the past decade have been a fraction of the historic landings. From 2014-2022 BSB made up less than 5% of the total summertime landings for the short range nearshore CPFV trips in southern California. This is a result of the disappearance of the BSB spawning aggregations in southern California. To stay in business and offer fishers productive fishing trips for the past decade, CPFVs and their sportfishing landings have had to target other species like: California scorpionfish (aka sculpin), rockfish, kelp bass, ocean whitefish, and other nearshore species. Furthermore, a switch from BSB to other species is unlikely to have spillover indirect economic impacts on the bait suppliers in the area, as the primary bait for BSB are anchovies, while many suppliers primarily carry sardines for its use as a multispecies baitfish; therefore, bait suppliers are unlikely to see any costs for transitioning to an alternative bait species as they are already doing that.

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		5-c. Comment noted.
6. Jaime Diamond, Stardust Sportfishing, 1/30/2025	6-a. Owner of Stardust Sportfishing in Santa Barbara, thanks the Department for hosting the working group and all who participated, the process can serve as an excellent template for future collaborative fisheries management. 6-b. Reports consensus at the 2024 BSB Working Group that collecting data for a formal SA must be the highest priority; lists types of data that should be collected for the SA, including those that align with priorities listed in the BSB ESR. 6-c. Industry highlighted research into transboundary movements (across US/Mexico border) as a priority. 6-d. Industry highlighted research into refining recruitment estimation methods. 6-e. Industry highlighted the need to evaluate impacts of recent management changes (2013). 6-f. Expressed concerns regarding the misrepresentation of population trends due to shifting effort and climate change; expressed concerns over the presentation of data without context.	6-a. The Commission and Department acknowledge and thank Stardust Sportfishing for past and continued partnership in the BSB working group. 6-b. There was consensus among the CPFV fleet/angling representatives that a formal SA must be the highest priority. The Department is pursuing the idea of a stock assessment conducted by CDFW staff, as well as using a MSE for testing prospective management options. 6-c. See response 3-i. 6-d. The Department is going to be working with the BSB working group to determine which scientific studies can be accomplished before and after this regulation sunsets in 2028. 6-e. The Department continually analyzes both fishery-dependent and fishery-independent data for the BSB fishery, while always considering other factors that may influence management changes. To read more about the BSB fishery and impacts of regulations please read the BSB ESR and the ISOR associated with this regulatory package.

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	6-g. Growth slows significantly from 12-14 inches which allows for extra years of spawning to occur and does not believe this was reflected in information provided by the Department. 6-h Regulatory changes could negatively impact coastal communities and disadvantaged anglers; fishing provides a vital food source for many recreational anglers. 6-i. Charter fleet continues to offer assistance for collaborative sampling; will take time to collect and analyze needed information but is essential for sound management and creating a clear roadmap showing how proposed changes will address assumed problems through science; looks forward to working together.	6-f. See response 2-e. 6-g. The Department does incorporate this growth rate information (described in Walker et al. 2020; see BSB ESR for full citation) in analyses. 6-h. See response 2-j. 6-i. Comment noted. Additionally, the Commission and Department appreciate the offer of continued engagement moving forward. The Department has been in discussions with the charter and private fleets regarding different options for collaborative sampling efforts which include customized catch card technology used in other states.
7. Robert Falcone, Point Loma Sportfishing, 1/30/2025	7-a. Point Loma Sportfishing Association of San Diego has been in San Diego Bay for 78 years providing fishing trips ranging from ½ day to 16 days and ½ day trips especially important for introducing new anglers to the sport. 7-b. BSB are a vital part of the Southern California fishery and if the goal is to increase fishing opportunities in the long run it would be counterproductive to enforce regulations so restrictive they force businesses to close and would	7-a. Comment noted. 7-b. See response 5-b. 7-c. Comment noted. 7-d. See response 5-b. 7-e. Comment noted.

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	precipitate a severe economic downturn for the local CPFV fleet. 7-c. The following factors should be thoroughly studied before any decisions about regulations are made: BSB migration across the border should be studied in collaboration with the Mexican government and universities, study the behavior, spatial distribution, and population dynamics of juvenile BSB in local coastal waters, assess whether reducing current catch levels will influence future local fish stock, exploration of existing data sets that assess local BSB recruitment strength at smaller sizes. 7-d. Consider the broader impact of these changes on the sportfishing fleet and the preservation of recreational fishing access because we are already facing hardships from economic downturns, escalating fuel prices, fishing area closures, establishment of MPAs, seasonal closures, depth limitations on bottom fishing, increasingly stringent regulations of key species such as kelp bass and BSB that have already adversely affected local sportfishing businesses, the vermilion rockfish daily sub-limit, other contributing factors such as water pollution and weather.	

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	7-e. Gratitude expressed for the work of the Department and looking forward to working together to find a solution.	
8. Mike Harkins, CPFV Captain, 1/30/2025	8-a. Has worked on local sportboats in Newport Beach for 15 years, currently main operator of the Western Pride (1/2 day boat), and grown up on the ocean; is a firsthand witness to annual changes in the fishery based on several factors; coastal fishing makes up 95% of our business. 8-b. BSB are a key species for beginners and recreational anglers; BSB has been and continues to be one of our main staples. 8-c. BSB are not in decline or in need of drastic action; natural population fluctuations are due to environmental factors affecting their migratory movements; current regulations are sustainable. 8-d. These new regulations would negatively affect sportfishing businesses, captains, and the next generation of anglers. 8-e. Supports using regulations for conservation, but the proposed restrictions are damaging and unwarranted.	8-a. Comment noted. 8-b. See response 2-k. 8-c. The Department is concerned that the population has been depressed and is just starting to show signs of improvement. Abundance estimates suggest a severely depressed population in southern California. The presumed decline is likely due to a combination of environmental conditions, poor recruitment, and fishing pressure on easily targeted spawning aggregations. In the mid-2010s, southern California had a large recruitment pulse of BSB larvae, and these fish have become old enough to enter the fishery around 2023/2024. This pulse of BSB have started to form spawning aggregations, which had been missing for nearly a decade. The Department's scuba surveys do not indicate another large recruitment pulse in the years following the mid-2010s recruitment pulse, as referenced in the ISOR and other presentations. These spawning fish represent the possibility of more locally sourced larvae, which will help rebuild the BSB fishery. Increased fishing of BSB spawning aggregations

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		could undo the progress of this rebuilding fishery. The proposed regulations are in response to the Department's concern with the sustainability of this fishery. 8-d. See response 5-b. 8-e. Comment noted.
9. Donna Kalez, Dana Wharf Sportfishing and Whaler Watching, 1/30/2025	9-a. Part owner and operator of Dana Wharf Sportfishing and Whale Watching, a family business that has been operating in Dana Point Harbor since 1971; emphasizes the importance of their business to the local fishing industry and the importance of BSB fishing to the diverse community of anglers. 9-b. The 2013 regulation changes significantly impacted our business and customers; additional regulations on BSB fishing would negatively impact small businesses, captains, and crew members who rely on the industry. 9-c. Many anglers, including families and those with limited budgets, depend on local fishing trips for affordable fishing opportunities and these proposed regulations represent a targeted attack on fishing access. 9-d. Our customers do not pose a risk to the BSB population; The 2013 regulations, including the 14-	9-a. Comment noted. 9-b. See response 5-b. 9-c. See response 2-j. 9-d. See response 8-c. 9-e. See response 2-e. 9-f. See response 1-c and 2-g. 9-g. See response 2-i. 9-h. See response 2-h. 9-i. See response 8-c. 9-j. The Commission and Department acknowledge and thank them for their support for the Department's recommendation. 9-k. Comment noted. 9-l. Comment noted. 9-m. Comment noted.

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	inch size limit, have already contributed to sand bass conservation and will continue to do so. 9-e. Post 2013 BSB catch declines are due to effort shifts to other species, not because fish are gone. 9-f. There is no current stock assessment; a fisheries management plan is needed before imposing further restrictions. 9-g. Scientists are only using catch reports for legal fish landed and do not capture stats regarding released fish, effort shifts, and the sheer volume of fish seen but not caught. 9-h. BSB are migratory, and their movement patterns complicate population estimates and conservation measures. 9-i. The 2023-2024 rise in BSB numbers suggests the species is not in decline. 9-j. Instead of closures, a reduction in the bag limit to four fish is a more reasonable solution during a subset period of 3 years, while scientific research is prioritized to determine if a change in the bag limit is warranted, and economic impacts are weighed. 9-k. Other environmental factors such as water pollution, sea lion predation, and climate conditions also impact BSB populations.	

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	9-l. The sportfishing fleet is willing to assist the Department with data collection to support conservation efforts. 9-m. Thanks the Department and places trust in the Department to make decisions that balance environmental needs with recreational angler enjoyment and that listen to everyone's voices.	
10. Steve Knoblock, City of San Clemente Mayor, 1/30/2025	10-a. The city of San Clemente strongly urges additional scientific studies be conducted, including assessing the current status of the population, before making significant regulatory changes to BSB management. 10-b. Anglers report increased juvenile and adult BSB interactions, especially releases, indicating that previous regulations (reduced bag limits and increased size limits) have been effective. 10-c. All the various fishing groups (piers, kayaks, small boats, commercial boats) that will be affected should be consulted, ensuring their input along with scientific data is considered. 10-d. The city supports a temporary bag limit reduction while research is conducted to assess the health of the fish stock.	10-a. See comment 1-c. 10-b. See responses 2-i and 8-c. 10-c. See response 2-j. A BSB working group that included the various fishing groups, BSB researchers, and CDFW staff was formed for this purpose. A timetable of these and other outreach efforts to these groups was presented at the December 2024 Commission Discussion meeting. 10-d. The Commission and Department acknowledge and thank them for their support for the Department's recommendation.

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11. Frank LoPreste, Landing/CPFV Owner/Captain, 1/30/2025	11-a. Has many years of experience in the fishing industry: captain for over 60 years, owns three landings, and is part owner of many CPFVs. 11-b. The BSB biomass moves between Baja Mexico and Southern California. BSB can be resident in some areas but also migrate based on food, water quality, and temperature. 11-c. The 2013 bass regulation changes have improved stock levels, which ensures sustainability without needing stricter restrictions; there is no crisis. The fleet and public report seeing many large and even more small BSB. 11-d. Comprehensive program for measuring and tagging released fish is needed. 11-e. Communication between CDFW and mariners should be improved for a more comprehensive data picture; make sure to consult anglers from all areas/access types, including public piers, breakwaters, docks, small boats, and shore. 11-f. Restrictions would disproportionately impact disadvantaged shore anglers. 11-g. Supports reducing the bag limit to four fish while working with the fishing community to gather more data.	11-a. Comment noted. 11-b. See response 2-h. 11-c. See response 8-c. 11-d. The Department has an ongoing study the counts and measures released and retained bass aboard CPFVs. This information, along with similar data collected by CRFS, are used in BSB management. Please also see response 3-i. 11-e. See response 10-c. 11-f. See response 2-j. 11-g. The Commission and Department acknowledge and thank them for their support for the Department's recommendation. 11-h. Comment noted.

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	11-h. Conduct a full stock assessment and then revisit potentially implementing any further restrictions.	
12. Sharif Mohamed, CPFV Captain, 1/30/2025	12-a. Is a USCG Captain with 27 years of experience operating sportfishing boats in Newport Beach; operates CPFVs and also his own recreational boat. 12-b. Has observed BSB populations firsthand and acknowledges a decline over time but also notes a resurgence in 2023. 12-c. Highlights significant urban runoff pollution from the Los Angeles and Santa Ana Rivers and asks what is being done to reduce ocean pollution. 12-d. Does not think local recreational anglers are having an impact on BSB; asks what data shows fishermen are suddenly impacting BSB populations; feels there is a larger oceanic cycle affecting BSB that we cannot measure through history and change. 12-e. Restricting catch during peak season will harm recreational anglers, sportfishing operators, and summer passenger loads; will not be able to operate twilight runs.	12-a. Comment noted. 12-b. Comment noted. 12-c. While the Commission and Department acknowledge the significant impacts of pollution on the BSB resource and take them into consideration, reducing ocean pollution is not within the purview of the Commission or Department. 12-d. See response 8-c. 12-e. See response 5-b. 12-f. Comment noted. The Department plans to increase the efforts to be in contact with researchers and management in Mexico regarding sampling efforts to fill data gaps. BSB are primarily taken in a commercial trap fishery in Baja California Sur. The Commission is not aware of Mexico implementing similar conservation measures. Fishing industry and a non-governmental organization in Mexico are working on a BSB fishery improvement program with the main objective of achieving a sustainable fishery to

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	12-f. Calls for increased collaboration with Mexico on BSB management and asks if Mexico is implementing similar conservation measures. 12-g. Does not believe an aggressive change in regulations will help; advocates for delaying new regulations for 3-5 years to allow for further research and collaboration with Mexico. 12-h. Expresses respect for the Department but calls for a compromise that will work for all stakeholders.	ultimately obtain a Marine Stewardship Council certification. 12-g. See response 1-c. 12-h. Comment noted.
13. Rick Oefinger, Marina Del Rey Sportfishing, 1/30/2025	13-a. Entire career has been in the CPFV business, starting in 1970 and primarily in Santa Monica Bay; has been the president of Marine del Rey Sportfishing, Inc. since 1995. 13-b. Expresses skepticism over the urgency of proposed restrictions, arguing that BSB are not in immediate danger; suggests calls for emergency zero take are driven by few misguided individuals with an agenda. 13-c. Advocates for collecting thorough and objective data before making major management decisions. Believes BSB populations are stable and drastic action is unnecessary at this time. 13-d. Supports the Department's proposal for a 36-month sand bass study.	13-a. Comment noted. 13-b. See response 8-c. 13-c. See response 1-c. 13-d. The proposed regulation will sunset after three years, but there is no specific 36 month BSB study. During this time the Department will work with the BSB working group to address information gaps. See responses 3-i and 6-d. 13-e. Support for the Department's recommendation is noted.

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	13-e. Agrees with a 25% reduction in allowable take (reducing bag limit to 4 fish of 14 inches or longer per person, per day) as a temporary measure during the study period.	
14. Larry Phillips, American Sportfishing Association, 1/30/2025	14-a. Expresses thanks for the opportunity to comment and is commenting on behalf of the American Sportfishing Association. 14-b. Recreational fishing contributes $6.2 billion annually to California's economy and supports 43,000 jobs; over 50,000 BSB were harvested in 2023, suggesting significant economic benefits. 14-c. Catch rates alone are not a reliable measure of decline; other factors such as effort shifts must be considered. 14-d. A comprehensive stock assessment is needed before imposing further restrictions because management decisions should be based on accurate population data rather than indirect indicators, like catch rates. 14-e. BSB moves between California and Mexico, so their movements and migrations patterns should be studied before making significant regulation changes. 14-f. Restricting access may disproportionately affect disadvantaged and tribal communities.	14-a. Comment noted. 14-b. Comment noted. 14-c. See response 2-d. 14-d. See responses 1-c and 2-g. 14-e. See response 2-h. 14-f. See response 2-j. Tribal outreach was conducted and there was no concern with proposed regulation changes to limit take of BSB. 14-g. See response 2-k. 14-h. The Department agrees with this comment. See comment 8-c. 14-i. This is not an emergency regulation package.

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	14-g. BSB are a key species for beginner anglers, and further restrictions could discourage the development of long-term engagement in fishing and reduce fishing license sales. 14-h. The current size limit protects spawning fish sizes 10-14 inches and supports sustainability. 14-i. ASA opposes emergency closures like zero-take regulations.	
15. Mark Pisano, 22nd Street Sportfishing Landing, 1/30/2025	15-a. Writing to express concerns regarding increased regulations on BSB on behalf of 22nd St. Landing Sportfishing and the Los Angeles County Sportfishing fleet. 15-b. BSB is vital to recreational fishing and supports vessel owners, crew, and local communities, as well as inspiring lifelong passions for sportfishing. 15-c. Customer participation has declined since the 2013 bass regulation change. 15-d. Entry-level anglers, especially low-income families, rely on BSB fishing for recreation and food; further restrictions would disproportionately impact over 60% of entry-level anglers. 15-e. Current groundfish limits on depth, bag size, and season length are reducing angler	15-a. Comment noted. 15-b. Comment noted. 15-c. The CPFV logbook data records BSB landings and number of fishers aboard each trip. These logs show a precipitous drop in number of fishers aboard CPFVs that retained at least BSB per trip starting in the mid-2000s, about a decade before the 2013 regulation was enacted. The Commission acknowledges that this regulation may not have helped participation in the BSB fishery; however, the absence of BSB spawning aggregations is the more likely culprit for dissuading fishers to choose CPFV trips targeting BSB. 15-d. See response 2-j. 15-e. Comment noted.

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	participation, causing frustration, and exacerbating the fishing industry's financial challenges. 15-f. Regulations must align with scientific data and fishermen's observations. 15-g. BSB lacks a comprehensive stock assessment, which makes establishing a fisheries management plan necessary; advocates for a stock assessment which is needed to set clear conservation goals for BSB. 15-h. Advocates for a temporary reduction in BSB retention while addressing data gaps identified by the Department.	15-f. Comment noted. 15-g. See response 2-g. 15-h. Support for the Department's recommendation is noted.
16. Esther Sanchez, City of Oceanside Mayor, 1/30/2025	16-a. BSB fishing is crucial for recreational anglers in Oceanside and a zero-bag limit would especially hurt low-income and subsistence fishers. 16-b. Advocates for more data collection before implementing regulatory changes, emphasizing that accurate, up-to-date data be used to assess the current status of BSB populations. 16-c. Recent observations from the angling community report increased juvenile and adult BSB interactions, especially releases, indicating that previous 2013 regulation changes have been effective.	16-a. See response 2-j. 16-b. See response 1-c. 16-c. See response 8-c. 16-d. Comment noted and see response 10-c. Outreach efforts have been ongoing with commercial and private fishing fleets. 16-e. Support for the Department's recommendation is noted.

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	16-d. Requests that all impacted groups, including pier, breakwater, kayak, CPFV, and small boat anglers, be consulted. 16-e. Supports a temporary reduction of the bag limit while further research is conducted to assess health of the BSB stock.	
17. Chugey Sepulveda, Pfleger Institute of Environmental Research, 1/30/2025	17-a. The BSB fishery lacks a formal stock assessment or Fishery Management Plan despite its significance. 17-b. The 2013 bass regulatory changes protect the spawning stock, but the full benefits may not yet be realized; despite recent increases in the number and size of BSB landed, industry, researchers, and state managers all recognize the need to address existing data gaps and improve our capacity to manage the southern CA BSB fishery. 17-c. In alignment with Section 5.1 of the BSB Enhanced Status Report and discussions during the 2024 BSB Working Group, key areas needing research include: better understanding of BSB stock structure, understanding effects of Mexico's BSB contributions, improving length-frequency data from retained and released catch (US and Mexico), improving mortality estimates (US and Mexico;	17-a. See response 2-g. 17-b. Comment noted. 17-c. See response 6-d. 17-d. Comment noted. 17-e. See response 3-i. 17-f. Comment noted. 17-g. See comment 5-b. 17-h. Comment noted. 17-i. Comment noted.

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	natural, fishing, and post-release), and improving recruitment estimation methods. 17-d. A better understanding of the above-mentioned research areas will improve our capacity to manage this valuable bi-national resource and help us understand the fluctuations in BSB abundance that have been characteristic of this fishery since the 1950's. 17-e. Unclear stock boundaries due to transboundary movement with Mexico hinder effective management. Previous tagging studies on BSB were not designed to assess stock structure, so a comprehensive transboundary tagging study is needed for the following reasons: prior tagging studies were incomplete and lacking a tag recapture program in Mexico, conducted before the introduction of trapping and the widespread targeting of BSB in Mexico, and tagging efforts did not encompass the entire species range (south of US/Mexico border). 17-f. With changing environmental conditions, tagging studies should be periodically revisited to understand if movements or distributions have changed over time; several studies are cited referencing ways in which water temperature and other environmentally driven factors affect	

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	recruitment dynamics and reproductive capacity which lead to fluctuations in BSB abundance. 17-g. Considering recent information on the lack of a local spawner-recruit relationship, a full summer closure may not effectively rebuild local BSB stocks and could severely harm the recreational fishing industry. 17-h. Instead of a full summer closure, recommends a three year research period using industry participation to help collect and fill important data gaps as an effective way to move forward. 17-i. Provides a Literature Cited List.	
18. Wendy Tochihara, 1/30/2025	18-a. The writer of this letter represents the 422 signers and opposes closing BSB fishing during the summer months. 18-b. Closing BSB fishing during summer months is an extreme and unreasonable response that primarily supports the popular narrative of the scientific community that any fishing during spawning is bad, but we disagree. 18-c. BSB are important to recreational anglers, children, veterans, and especially those with less disposable income; many pier and jetty anglers	18-a. Comment noted. 18-b. Comment noted. 18-c. See response 2-j.

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	depend on BSB catch for sustenance; BSB are a highly prized catch.	
19. Joe Villareal, Mirage Sportfishing, 1/30/2025	19-a. Represents a CPFV that has over 30 years in this fishery and has a life of fishing in the Southern California Bight. 19-b. BSB is a critical species for the industry's economic survival; continued allowable catch of BSB is necessary to sustain business operations. 19-c. Supports a 4-fish bag limit for three years to allow further study. 19-d. Argues existing science/surveys are flawed and need improvement via collaboration between the Department and industry to develop a better stock assessment. 19-e. Believes current regulations and MPAs have already ensured sustainability and we are creating a problem that is not there urges against a "kneejerk reaction" that could harm an already struggling industry.	19-a. Comment noted. 19-b. See response 5-b. 19-c. Support for the Department's recommendation is noted. 19-d. See response 2-g. 19-e. See response 8-c.
20. William Wilkerson, B&M Sportfishing, 1/30/2025	20-a. Requests postponing BSB regulatory decisions until proper research is conducted to address the critical uncertainties. 20-b. BSB plays a critical role in the recreational fishing industry, especially for economically	20-a. See response 1-c. 20-b. See response 2-j. 20-c. Comment noted.

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	constrained anglers and small, family-owned party-boat operations, like his own (owns a ½ day and ¾ day fishing business in San Diego). 20-c. Urges decision-makers to consider his recommendations to ensure a balanced approach that prioritizes both conservation and economic sustainability. 20-d. Scientific research priorities should include: targeted research to address data gaps regarding BSB population dynamics, collaboration with Mexico to study seasonal migrations influenced by water temperature, research on juvenile populations (behavior, location, abundance) possibly through a tag and release program for short BSB, and the calculation of a maximum sustainable yield. 20-e. Suggests the following management and conservation measures: temporary bag limit reduction to four fish, maintain existing size limit for spawning protection, and implement a total allowable catch system. 20-f. Highlights the importance of BSB for shore and pier anglers and small family-owned businesses, warning of potential economic harm from overly restrictive measures.	20-d. See comment 6-d. 20-e. Support for the Department's recommendation is noted. Other conservation measures will be evaluated with the BSB Working Group in the coming years. 20-f. See response 5-b. 20-g. See response 6-d. 20-h. See response 3-i. 20-i. The Department disagrees with this statement. Southern California is part of the core range for BSB. Please see BSB Enhanced Status Report for more information and citations.

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	20-g. Lists key research questions to be answered including questions about: future abundance effects of reducing catch limits now, the role of fishing pressure vs environmental factors on fluctuation of BSB catches, high-abundance years possibly being a result of adult BSB migrations into CA, how dependent local BSB populations are on immigration from Baja CA, and which environmental factors constrain CA BSB catches and by how much. 20-h. Sportfishing industry supports U.S.-Mexico collaboration on BSB migration research; existing data sets on local BSB recruitment should be analyzed for additional insights. 20-i. Notes how Southern CA is at the northern edge of the BSB range, with thriving populations in Baja CA.	
21. John Yamate, Seaforth Sportfishing, 1/30/2025	21-a. Is part owner and general manager of Seaforth Sportfishing on Mission Bay in San Diego; describes his long history and experience fishing in San Diego. 21-b. BSB is a key species for local fishing trips (half-day, three-quarter-day, twilight), which provides an affordable and family-friendly alternative to longer multi-day fishing trips; the 2013 bass regulation changes already impacted	21-a. Comment noted. 21-b. See response 5-b. 21-c. Support for the Department's recommendation is noted. 21-d. See response 1-c. 21-e. See response 6-d.

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	the industry; further bag limit reductions or seasonal restrictions would be detrimental. 21-c. If changes must occur, prefers a four-fish limit with the current minimum size limit. 21-d. Advocates for completion of a stock assessment and studies on both adult juvenile BSB before any regulatory changes are made. 21-e. Encourages any studies to include BSB populations in northern Baja, as they are probably linked to Southern CA spawning aggregations.	
22. David Choate, 1/31/2025	22-a. Deeply concerned about the potential establishment of a no-take season for BSB from June 1 to August 31; believes decision to suggest a no-take season lacks sufficient scientific basis and fails to consider the ecological, social, and economic implications; respectfully urges the Commission to avoid a no-take season for BSB. 22-b. Catch rates are not a reliable indicator of population decline; anglers and sportfishing operators have shifted focus to other species like bluefin tuna, which may create a false perception of declining BSB populations. 22-c. There is no comprehensive, updated stock assessment to justify a no-take season.	22-a. Comment noted. 22-b. See response 2-d. 22-c. See response 2-g. 22-d. See response 2-h. 22-e. See response 2-j. 22-f. See response 2-k. 22-g. See response 5-b. 22-h. Comment noted.

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	22-d. Migratory behavior is not considered; BSB move between different habitats and regions making localized data potentially misleading. 22-e. A no-take season would disproportionately negatively affect disadvantaged and underprivileged anglers, including tribal communities; these groups rely on nearshore BSB fishing for accessibility and subsistence. 22-f. BSB is a 'gateway fish', helping to introduce new anglers to fishing and fostering long-term engagement; eliminating access could harm recruitment efforts and fishing license sales, impairing the success of the Department's 3Rs program (Recruit, Retain, Reactivate). 22-g. The industry contributes billions to California's economy; a no-take season could have cascading negative effects, harming tackle shops, charter businesses, and tourism. 22-h. Urges the Department to prioritize updated research and collaboration with stakeholders before establishing a no-take for BSB; a balanced approach is needed to ensure sustainable management without unnecessary restrictions.	

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23. Tonie Bangos, Coastal Conservation Association of California, 2/13/2025	23-a. California species are subject to oceanographic conditions. There is a correlation between the availability of anchovies and barred sand bass (BSB) catch rates. 23-b. Lack of funding is the response to lack of data or stock assessment. We want to protect stocks without doing unnecessary harm to anglers. Hear from CPFV captains and the anglers. The fishery community needs to be included in policy discussions.	23-a. While anchovies are a forage fish for BSB, there are no peer reviewed scientific journal articles that support this correlation. In the SA for northern anchovy, "Assessment of the northern anchovy (*Engraulis mordax*) central subpopulation in 2021 for US management", Kuriyama et al. 2022, there has been a large annual biomass of young-of-year anchovy present in southern California since 2016; however, 2014-2022 BSB landings from CPFVs were the lowest ever recorded. If these two stocks were correlated, then the Department would have expected to see higher landings and abundance of BSB during these years. 23-b. Comment noted and see response 10-c.
24. Donna Kalez, Dana Wharf Sportfishing owner, 2/13/2025	24-a. The proposed BSB regulation changes should only be reduced by 1 fish or remain the same at 5 while more science is conducted. 24-b. There are so many small fish that we're not reporting, and that we can't show you, unless you're on the water. 24-c. Any reduction in the bag limit will impact her business.	24-a. Support for the Department's recommendation is noted. 24-b. See response 2-i. 24.c. See response 2-j.
25. Brian Woolley, Dana Wharf	25-a. Captain with 28 years of experience with 200 days on the water per year.	25-a. Comment noted. 25-b. See response 8-c.

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Sportfishing captain, 2/13/2025	25-b. Has seen a considerable rise in sub 14 inch sand bass caught from his vessel and more common to catch and release small BSB than legal sized BSB. This shows there is no shortage of juvenile BSB. Also, these fish do not have hook trauma showing they are not repetitively catching the same fish.	
26. Ken Franke, Sport Fishing Association of California, 2/13/2025	26-a. Represents many commercial passenger fishing vessels (CPFVs) in the south coast. 26-b. Past 10 years, the bag limits for BSB have been reduced from 10 to 5 fish, and the 10 inch to 14 inch spawning age adults have been released. Captains are seeing a recovery, not a crisis. 26-c. It's important to state our border region is the fringe of a biomass extending hundreds of miles down into Mexico. 26-d. SAC continues to recommend working on science data collection related to BSB while also permitting sport fishing access to the resource. We advocate that the information of all parties be integrated so a good decision is made based on the totality of the inputs.	26-a. Comment noted. 26-b. See response 8-c. 26-c. See response 20-i. 26-d. Comment noted.
27. Merit McCrea, Sport Fishing Association of California science	27-a. Cites Love et al 1996 stating BSB are easier for novice anglers to catch, and mentions spawning aggregations based on anecdotal observations but does not provide scientific description of them. The	27-a. BSB spawning aggregations are well documented in the scientific literature. Here is a list of some citations that reference the BSB spawning aggregations: Turner et al. 1969, Feder et al. 1974,

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coordinator, 2/13/2025	science makes two primary assumptions that appear unverified. The first is that BSB are aggregated and highly localized at a few specific locations during the summer months. 27-b. The second is that participating fish represent most of the local population. Our captains observed that there's a high probability of subsidy by northward migrants during those high catch years. 27-c. Asks to look at note provided comparing catch rates of barracuda and BSB.	Love et al. 1996, Hovey et al. 2002, Erisman and Allen 2006, Jarvis et al. 2010, McKinzie et al. 2014, Teesdale et al. 2015. 27-b. See response 2-h. 27-c. Comment noted.
28. Fred Huber, CPFV Captain, 2/13/2025	28-a. Over 40 years running CPFV. 28-b. This past summer, we saw one of the best aggregations of BSB we've seen in 30 years. Barely scratched at what was there. 28-c. BSB are a recreational classified fish, and it cannot be trapped or netted. 28-d. A seasonal closure on a recreation fish only would be unprecedented. Closing it during the summertime has not been taken into consideration.	28-a. Comment noted. 28-b. See response 8-c. 28-c. Comment noted. 28-d. There are seasonal closures for a variety of species managed by the Department, including: California grunion, rockfish and other groundfish, California sheephead, California spiny lobster, etc.
29. Aaron Graham, Captain of the Native Sun, 2/13/2025	29-a. A video produced by the Sport Fishing Association of California to explain the issues and recommendations and much of this video I did film myself on the water. 29-b. The BSB is a recreational resource that has supported California anglers for over a century. As	29-a. The Commission and Department appreciate the effort put forth to produce and share the video. 29-b. Comment noted. 29-c. The Commission and Department acknowledge and agree with these points with

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	a voracious coastal predator, BSB continue to be a staple for the Southern California recreational fishery, typically ranking within the top five species caught in most years. From CPFVs to kayak and pier fishermen, BSB play an integral role in supporting outdoor recreation in providing food for local families. 29-c. Like most of California's coastal resources, BSB abundance has been shown to fluctuate from year to year based on changing environmental conditions. Unfortunately, BSB recruitment and the factors that influence stock productivity are not fully understood. 29-d. In 2013, stringent management regulations were put in place to protect the BSB resource changing bag limit from 10 to 5 bass and increased minimum retention limit from 12 to 14 inches in length. BSB mature around 10 ½ inches so regulations ensure BSB have several spawning seasons prior to becoming legal for harvest. 29-e. Industry releases far more mature BSB than before and the management changes are finally bearing fruit and seeing improved BSB fishing in southern California. 29-f. Committed to improving BSB management and want to see year-round access to this	some additions. While the influence of various changing factors on BSB recruitment and stock productivity are complicated, progress has been made regarding understanding those dynamics that we can incorporate into stock assessments and MSE. For instance, data indicate BSB pulse recruitment is linked to warm-water events, there is a negative relationship between year-to-year recruitment and catch, strong larval recruitment is sporadic, and larval recruitment data have been shown to predict future BSB catch (both CPFV harvest and total estimated catch). 29-d. Comment noted. 29-e. Comment noted. 29-f. Comment noted. 29-g. Comment noted.

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	resource. Believe path forward is through sound scientific research and continued collaboration between our management partners and the sport fishing community. 29-g. The video then shows fishers catching and releasing sublegal BSB.	
30. Jason Cutter, 2/13/2025	30-a. BSB is already regulated, which allows the fish multiple opportunities for spawning before reaching the take size limit. 30-b. The size distribution of the BSB caught from 2017 to 2023 in southern California has increased favorably for spawning. 30-c. No formal stock assessment exists for the BSB, which is a dangerous precedent for regulations to be made without data in the future. 30-d. BSB is listed as least concerned by the International Union for Conservation of Nature, which means it does not need to be the focus of wildlife conservation. 30-e. Finally, according to the California Constitution, Article I, Declaration of Rights, Section 25, “the people should have the right to fish upon and from the public lands of the state and the waters thereof.” Does not support further closure of BSB.	30-a. Comment noted. 30-b. The Department agrees, see response 8-c for more information. 30-c. See response 2-g. 30-d. The International Union for Conservation of Nature does not monitor the current health of the BSB population, that is the role of the Department. The last assessment from the International Union for Conservation of Nature was done in May 1, 2008. 30-e. Comment noted.

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31. Matt Ryan, 2/13/2025	31-a. Reconsider this decision to close the BSB resource in California. 31-b. Been fishing for 40 years in southern California and the BSB was first fish they caught. Through fishing for BSB, learned the importance of conservation and how to maintain a proper bag limit, size limit and to keep a legal fish. 31-c. The BSB are delicious. BSB are a sustainable local resource for us to eat and it is available to many diverse people in our community. 31-d. Concerned that bag limit reduced to zero will affect license sales and local fishing landings.	31-a. Comment noted. 31-b. Comment noted. 31-c. See response 8-c. 31-d. See response 5-b.
32. Alex Estevez, 2/13/2025	32-a. I agree with all the statements of all the other captains and people that oppose this proposition.	32-a. Comment noted.
33. David Clinkscales, 2/13/2025	33-a. Please listen to these sports fishers. They have over 30 to 50 years on the water fishing every day. 33-b. This vote is not about BSB. To me, it looks to be another step towards shutting down fishing in California. Don't shut down the BSB fishery.	33-a. Comment noted. 33-b. Comment noted.
34. Brian Siwecki, 2/13/2025	34-a. Lifelong angler and has been fishing since a young age.	34-a. Comment noted. 34-b. Comment noted.

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	34-b. Thinks commissioners discussing transparencies to be questionable and creates more distrust among fishers. 34-c. The lack of quality and quantity of data for BSB has allowed commissioners to skip steps of implementing good policy tactics to push their agenda for personal career gain without sufficient evidence. 34-d. Taking away our BSB species poses an economic threat directly and indirectly to local communities. It will greatly affect lower socioeconomic communities for magnitude of generations to come, which transparently will go against the board's vision of diversity, equity, and inclusion. 34-e. In my statement with that people won't remember exactly what you said, but never forget how you made them feel.	34-c. Comment noted. 34-d. See response 2-j. 34-e. Comment noted.
35. Jim Holden, Fish for Life, 2/13/2025	35-a. Takes special needs kids ocean fishing. 35-b. I support sustainable fishing practices; I believe that allowing anglers to retain a legally sized BSB is a reasonable and meaningful exception.	35-a. Comment noted. 35-b. Comment noted. 35-c. Comment noted. 35-d. See response 8-c. 35-e. Comment noted.

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	35-c. Ninety-five percent of the fish we caught on our trips are released and we catch plenty of small BSB. 35-d. Their population certainly appears to be thriving. 35-e. Allowing the kids to catch and keep a BSB is not just about fishing, it's about instilling a sense of pride, accomplishment, and building self-esteem. I urge the Commission to consider the positive impact that keeping a legal size BSB has on young anglers and ensure that any regulatory changes do not take away this meaningful experience.	
36. Steve Duncan, 2/13/2025	36-a. 100% against barring the BSB fishery. Has taken children and grandchildren fishing. Don't take this away. Three F's of fishing: family, fun and fishing.	36-a. Comment noted.
37. Rene DeLeon, 2/13/2025	37-a. Please don't take away the BSB fishery. Has a lifetime of fishing with family and is important to them.	37-a. Comment noted.
38. Martin Jordan, 2/13/2025	38-a. I've been a fisherman in Southern California for the last 60 some years of my life. 38-b. The sports fishing industry will severely suffer consequences economically, and I really believe you should consider keeping the sand bass fishery open.	38-a. Comment noted. 38-b. See response 5-b. 38-c. See response 8-c. 38-d. See response 2-h.

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	38-c. There has been no scientific evidence supporting the fact that there is a shortage of this fish in our local waters. 38-d. They are a migratory fish and they're cyclatory. 38-e. So please heed the answers that the scientific community can respond with and continue surveys to support the local fisheries. 38-f. Please consider no closures of the bass fisheries we get to enjoy here in California.	38-e. Comment noted. 38-f. Comment noted.
39. John Stanley, 2/13/2025	39-a. Concerned recreational fisherman, and I would like to express my deep concern regarding this proposed amendment on the BSB. 39-b. This proposal lacks scientific research and data. There's no evidence, proper data and no stock assessment. 39-c. I think it says this on the website, I believe that this proposal will have effects on both our environment and the community of anglers who rely on this species for sustenance and recreation. The long-term implications may inadvertently cause irreversible damage to our marine environment. It is imperative to consider the long-term implications of this proposed amendment. Sustainable fishing practices are essential. Any of our natural	39-a. Comment noted. 39-b. See responses 2-d, 2-g, 3-e, and 8-c. 39-c. More restrictive conservation measures that promote sustainable fisheries will not cause irreversible damage to the marine environment.

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	resources by prioritizing immediate gains over the preservation of the BSB populations.	
40. Andrew S, 2/13/2025	40-a. Against closing down the BSB fishery. 40-b. It is a unique fishery where those who are low income are able to participate in this sport. A lot of people, they can't afford to go out on a full day, two day, three day trip to go out and hunt big game fish like tuna or yellowtail or marlin, but many can cash out $30-40 in order to learn how to fish the same way I learned how to fish with my grandparents and my dad. BSB gives them that opportunity to do so. I would just say please reconsider closing this fishery. 40-c. Use proper scientific data that show that BSB is abundant and migratory. 40-d. And with the proper bait and techniques you can catch these fish all day long.	40-a. Comment noted. 40-b. See response 2-j. 40-c. See response 2-d and 2-h. 40-d. Comment noted.
41. Motorola edge plus, 2/13/2025	41-a. I'm expressing my deep concern regarding the proposal amendment to alter the regulation on recreational take of BSB. 41-b. This proposal lacks scientific research and data. 41-c. As a dedicated advocate for preserving our natural ecosystem, I believe that this proposal will	41-a. Comment noted. 41-b. See responses 2-d, 2-g, 3-e, and 8-c. 41-c. See response 39-c.

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	have serious effects on both our environment and our community of anglers who rely on the species for sustenance and recreation. The long-term implication may inadequately cause irreversible damage to our marine environment. It is imperative to consider the long-term implication of this proposed amendment. Sustainable fishing practices are essential to ensure that future generations continue to enjoy the bounty of our natural resources. By prioritizing immediate gain over preservations of BSB populations, we may inadvertently cause irreversible damage to our marine environment. I urge the commission to reconsider this proposal amendment and consider the potential positive impact of our ecosystem.	
42. Rusty Padia, 2/13/2025	42-a. On the proposed amendments, it was saying there would be minimal impacts on small businesses and I just like to go against that. If you take away the BSB fishery, especially for the local half day and three quarter boats, you're going to be forcing them into huge fuel bills running to Catalina. There's going to be a big impact with where you can and can't fish. I work on the Freelance out of Davies Locker, it's a three-quarter day fishing boat, but it would absolutely decimate our twilight run and the half day boats.	42-a. See response 5-b. 42-b. See responses 2-d, 2-g, 3-e, and 8-c.

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	42-b. I don't think there's proper data. I could honestly say there hasn't been any data. Nobody comes on the boat to survey anything. And over the last three or four years, I've seen more and more sand bass over the course of the last three or four years than I have in previous years.	
43. iPhone2 Tim, 2/13/2025	43-a. The BSB is a recreational fishery that built the sport fishing industry. Without this fish there will be a huge economic impact up and down the coast, there will be a domino effect of businesses closing. 43-b. I disagree with this closure.	43-a. See response 5-b. 43-b. Comment noted.
44. Brandon, 2/13/2025	44-a. I'm in favor of reducing the bag limit by one, and I would also like to pose an increase in the size limit. 44-b. I do not agree with reducing it to zero because that will negatively impact charters. 44-c. It is a good recreational fish that a lot of people actually end up throwing back. 44-d. The data is not really too conclusive, but if you would like to increase their numbers and increase the ability for us to catch them in the long term, increase in the size limit and reduce bag limit by one.	44-a. Support for the Department's recommendation is noted. A size limit increase may potentially be considered when considering future conservation measures. 44-b. See response 5-b. 44-c. Comment noted. 44-d. See responses 2-d, 2-g, 3-e, and 8-c.

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45. Dave Hansen, 2/13/2025	45-a. This is a highly migratory fish. It spends most of its time down in Mexico, and then it migrates up into the southern California area in the June, July, and August months where it's accessible to everybody. 45-b. You don't need to have a lot of money to catch this fish. This fish fits into DEI since it is very accessible to the masses. It's a highly recreational fish and is how we started out our career fishing for this fish. 45-c. I can't understand why we would regulate a highly migratory fish.	45-a. See response 2-h. 45-b. See response 2-j. 45-c. BSB are not recognized as a highly migratory species. Highly migratory species are heavily monitored and regulated by the Commission, Department, and other federal agencies.
46. Robert Graber, 2/13/2025	46-a. I've been fishing in California for over 60 years, so I've seen many cycles of fish go up and down. 46-b. And I'm in agreement with all the other comments in opposition to this proposal. 46-c. Recreational fishermen are the original conservationists, and we support sustainable fisheries. 46-d. So please consider getting good science first before making any reductions in our limits. Collect good data, get information on the sustainability of the stock, and get information on the migratory and	46-a. Comment noted. 46-b. Comment noted. 46-c. Comment noted. 46-d. See responses 2-d, 2-g, 3-e, and 8-c.

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	spawning habits of these fish before considering any reductions in our limits.	
47. DBCustoms, 2/13/2025	47-a. I strongly disagree with the zero take closure of BSB with no proper science. 47-b. Also the huge economic impact that it's going to have on everything from donut shops to bait companies to landings to the pier fishermen. The economic impact is going to be huge. 47-c. BSB are great beginner catch and to close that would be really bad.	47-a. See response 39-b. 47-b. See response 5-b. 47-c. See response 2-k.
48. David's iPad 3, 2/13/2025	48-a. I'm writing to express my deep concerns regarding the potential establishment of the no take for the BSB. I believe the decision lacks sufficient science basis and fails to consider the broader ecological, social, and economic implications. I respectfully urge the commission to avoid a no-take season for barred sand bass on the following points. 48-b. Catch rates are not indicative of species decline. Catch rates alone should not be used as a definitive indicator of population health. 48-c. Failure to acknowledge migratory behaviors. Reports from the California Department of Fish and	48-a. Comment noted. 48-b. See response 2-d. 48-c. See response 2-h. 48-d. See response 2-k. 48-e. See response 5-b.

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	Wildlife do not adequately reflect the migratory nature of BSB. 48-d. BSB plays a critical role as a gateway species for young and novice anglers in the saltwater recreational fishing community and a no-take would prevent them from introductory into fishing. 48-e. The recreational fishing industry is a significant contributor to California's economy and this closure would negatively affect businesses.	
49. Charles Stephens, 2/13/2025	49-a. I beg you not to close this fishery. 49-b. I take underprivileged kids and handicapped people to learn to fish. If there's no more party boats, then they're not going to be able to fish. Don't reduce this bag limit. All the sport boats will go out of business, bait barges will go out of business.	49-a. Comment noted. 49-b. See response 5-b.
50. Frank Ursitti, H&M Landing Owner, 2/13/2025	50-a. BSB are a vital species for recreational anglers in Southern California. 50-b. Excessive restrictions will put fishing operations at risk of closure. 50-c. BSB is the gateway species of recreational fishing, fostering a lifelong passion for the sport. 50-d. Our fleet observes a high number of juvenile fish daily and short bass are released, continuing to	50-a. Comment noted. 50-b. See response 5-b. 50-c. See response 2-k. 50-d. See responses 2-i and 3-i. 50-e. See response 2-h.

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	spawn. However, this demographic of BSB goes undocumented. I recommend a study into the movement and behavior of released fish. I also recommend a study into the origin of the large volume of fish appearing seasonally in the summer. 50-e. These are not comprised solely of local resident fish. This species is spread over many hundreds of miles of coastline and the California bight is the upper fringe of this range. 50-f. Those I represent support implementing a bag reduction to four fish. 50-g. Additional science is needed to determine the population dynamics of this cross-border species. We urge the Commission to prioritize research through collaboration with stakeholders.	50-f. Support for the Department's recommendation is noted. 50-g. See response 3-i.
51. Aaron Orsini, 2/13/2025	51-a. I would like to reiterate that I support Jason Cutter, Frank Ursitti, Captain Dave Hanson, and others talking here. 51-b. I wanted to emphasize the economic impact that this closure would mean for a lot of fishermen. I've seen what happens when charter boats can't make a large enough season to continue their business. And it affects a lot more than just the fishermen and the boats. It affects local businesses, taco shops and many other facets of the economy. So please keep in mind the	51-a. Comment noted. 51-b. See response 5b.

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	economic impacts these decisions are having all over California and the entire west coast.	
52. Chugey Sepulveda, Pfleger Institute of Environmental Research, 2/13/2025	52-a. We have really unique opportunity right now to bring together managers, fishery scientists and our industry to address some of the important data gaps that we know that have existed and still exist for better managing the BSB resource. This collaboration would actually build a lot of trust between managers and the fishing community. If we were to go towards a closure, it would really detract and it would preclude any data collection. It would set back this collaboration that we need to have between our managers and our fishing industry.	52-a. Comment noted. See response 6-d.
53. Anupa Asokan, Fish On, 2/13/2025	53-a. Most state level management is done without stock assessments. Fishery management is inherently data limited and decisions are regularly made with the best information available. 53-b. There's very compelling data here to support a precautionary approach and consideration of a seasonal closure for the future of the species. A seasonal closure can be undone and a fishery collapse cannot. 53-c. And I also want to emphasize the opportunity here to support shore-based and true subsistence	53-a. Comment noted. See response 2-g for more background information. 53-b. The Commission agrees that there is sufficient data to support more precautionary management measures; however, the Commission and Department want to maintain trust with the fishing community by working together towards filling some information gaps about BSB. The Commission believes BSB are not in danger of a fishery collapse in the next few years. The Department will be working with fishing industry

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	fishing communities who are concentrated on piers and jetties. Catch quality has severely declined for these communities over the decades. 53-d. BSB are actually under public health advisories here in the Los Angeles area. 53-e. And this is an opportunity to directly support the long-term health of a species and begin to restore resources for near shore fishing communities.	representatives, BSB researchers, and non-governmental organizations representatives over the long term to identify high priority research projects to fill information gaps and discuss sustainable conservation measures, based on the best available science, to protect BSB spawning aggregations in the future. 53-c. Comment noted. 53-d. Comment noted. 53-e. Comment noted.
54. Rick Maurer, 2/13/2025	54-a. I've been scuba diving the Santa Monica Bay area for approximately 50 years and I have never seen this area lacking in BSB. There are large schools of them in the hundreds in 30 to 50 foot of water between Sunset Boulevard and Topanga Canyon and they vary in size from 12 to 18 inches. At the numerous artificial reefs that the Fish and Game Commission has built, they are the most prevalent fish on the reef. Here, they vary in size from 14 to 24 inches and some even larger. 54-b. I don't believe this fish should be on the endangered list. 54-c. There needs to be more underwater science by scuba divers to determine the actual stock assessment.	54-a. See response 1-a. 54-b. See response 1-b. 54-c. The Department performs scuba surveys to count and size BSB during the fall months at 10 sites from San Diego to Santa Monica Bay. These surveys have been ongoing since 2017 and the data are being used to inform a SA for BSB. Additionally, the Vantuna Research Group has been performing fish surveys on scuba that sample BSB habitat since the 1970s. These data were presented at the July and November 2024 Marine Resources Committee meetings and the December 2024 Fish and Game Commission meeting.

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55. Bob Lohrman, 2/13/2025	55-a. I grew up in the sport fishing industry running boats for 10 years and then I went over and I started my own business as an offshore environmental company. We work for many different public agencies from the EPA collecting BSB. We've done thousands of scientific otter trawls all along the California bight. We caught a lot of BSB and that data is available. 55-b. I fished the spawning aggregates in my earlier years and it was amazing fishery, all of a sudden they would be gone. They're highly migratory. Every year I do a long range trip and we catch plenty of fish. Coming up the coast there was numerous spots of BSB. 55-c. They are not endangered at all.	55-a. Comments noted. The Department will be inquiring more about the studies the commentor has participated in. 55-b. See response 2-h. 55-c. See response 1-b.
56. Mr. Wolf, 2/13/2025	56-a. How come we don't get the studies of a migratory fish?	56-a. See response 2-h.
57. Larry Phillips, American Sport Fishing Association, 2/13/2025	57-a. The challenge we're hearing is a lot of folks are questioning the science. Many of us are involved in the stock assessment process through the council which defines abundance in terms of unfished biomass and clearly we don't have that. We would strongly encourage CDFW to invest in stock assessments that will allow us to allow the	57-a. See responses 2-d, 2-g, 3-e, and 8-c. 57-b. Please note a BSB working group that includes representatives of the fishing industry, BSB researchers, and Department staff has been established. See response 10-c.

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	agency to accurately estimate biomass. What we can't have is we're fine, we're fine, we're in trouble. 57-b. What we need is to collectively partner with the industry. We're willing to help if we have confidence in the need for conservation closure, conservation challenges, reductions in fisheries.	
58. Chris Renk, 2/13/2025	58-a. I am here to emphasize the importance of making an informed decision for our fishing community. 58-b. The BSB initiative will be a significant impact on our local economy, businesses, and the next generation of anglers. 58-c. Fishing sand bass is more than just a pastime, it's a gateway for the youth, lower income and individuals that are less fortunate to engage and appreciate the marine environment. 58-d. Fishing community contributes significantly to our state, 1.2 to 2.5 million fishing licenses are issued annually.	58-a. Comment noted. 58-b. See response 5-b. 58-c. See response 2-k. 58-d. Comment noted.
59. Dwayne James, 2/13/2025	59-a. This last season we had some of the best bass fishing ever, catching multiple at a time. Every quarter mile you can stop and get bass, it’s a wonderful fishery. 59-b. We need to save it and keep it for our kids in the future.	59-a. Comment noted. 59-b. Comment noted.

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60. Tom Troop, 2/13/2025	60-a. Fishing BSB given the caller and family a way to bond, be conservation minded, stay motivated in school and keep from doing drugs.	60-a. Comment noted.
61. Tom Stephens, 2/13/2025	61-a. I don't think there's any scientific studies that are backing this. 61-b. These are migratory fish and they should tag some bass from Mexico all the way up the coast. They should start a tagging system like we do with salmon and trout. 61-c. Why shut down family businesses that have operated for over 50 years? This will have big impacts on them. 61-d. They follow the anchovies, like people they follow the food. You don't catch BSB on an eight inch sardine.	61-a. See responses 2-d, 2-g, 3-e, and 8-c. 61-b. See responses 2-h and 3-i. 61-c. The Commission wants to manage the BSB resource in a way that it will be available for future generations and does not want to intentionally shut down family businesses. Please see response 5-b. 61-d. See response 23-a
62. Owner, 2/13/2025	62-a. You can't catch sand bass on eight inch sardines. 62-b. We've been in a warm water year for quite some time now. Now that we're going to anchovies catch is increasing. 62-c. It's a migrating fish, it follows the sardines.	62-a. Comment noted. 62-b. See response 23-a. 62-c. See response 2-h.

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63. Tony Mayfield, 2/13/2025	63-a. I totally disagree with everything you're saying. 63.b There's no science behind this. I disagree with everything.	63-a. Comment noted. 63-b. See responses 2-d, 2-g, 3-e, and 8-c.
64. the Slider, 2/13/2025	64-a. About 60 years of fishing experience in southern California. 64-b. There's BSB out there every single time I go out and the ratio of sand bass to calico is about two to one. 64-c. These fish are migratory and they're out there all year long. 64-d. Please don't limit the catch of BSB because it's introductory fish for all the kids.	64-a. Comment noted. 64-b. Comment noted. 64-c. See response 2-h. 64-d. See response 2-k.
65. Lisa Nishko, 2/13/2025	65-a. I have well over 30 plus years fishing and scuba diving in Southern California. 65-b. I have personally caught and seen many sand bass and can assure you there is no such shortage. 65-c. I am against your unnecessary and redundant restrictions on any and all of our coveted fish. I implore you to not take any more fish away from us. This is not a sports fishing problem. As you can see and hear from all of us, your science is not adding up.	65-a. Comment noted. 65-b. Comment noted. 65-c. Comment noted.

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66. Frank Moreno, 2/13/2025	66-a. I agree with everything that's been said. 66-b. There is a problem that we're not talking about, the water, and that's the there's so much pollution in our area. That's where we need to focus on. 66-c. The fish are plentiful. I don't believe that we should restrict them. 66-d. Our kids need to be able to fish as an introductory fish that needs to be available to our fishery.	66-a. Comment noted. 66-b. See response 14-c. 66-c. Comment noted. 66-d. See response 2-k.
67. Patrick, 2/13/2025	67-a. You guys are taking the fish counts from the last 10 years for BSB on the sport boats. In the last 10 years, we've had a big run of pelagics fish come in. So sport boats, even the half day boats, are spending a lot of their time looking for the pelagic fish and they're not fishing for the BSB. Once the pelagic fish disappear more, you're going to see a lot higher fish counts on the BSB.	67-a. See response 2-e.
68. Joaquin, 2/13/2025	68-a. I'm a local deaf fisherman from Southern California. 68-b. Commissioners reducing BSB fishing in Southern California is unnecessarily harmful to the economy. BSB fishing supports thousands of jobs and generates millions for local businesses, including tackle shops, charter boats, and tourism.	68-a. Comment noted. 68-b. See response 5-b. 68-c. See response 8-c. 68-d. See response 12-c. 68-e. Comment noted.

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	Restrictions would hurt these industries and coastal communities. 68-c. Second, conservation success. Existing size and bag limits are working. Studies show BSB are one of the top sport fish in Southern California, and current management strategies are keeping populations stable. 68-d. Third, the real environmental impact. The biggest threats to BSB are habitat loss and environmental changes, not responsible fishing. Addressing pollution and habitat degradation would do more for conservation than limiting anglers. 68-e. Fourth, public trust. Anglers support conservation and have historically funded fishery programs. More unnecessary restrictions will damage trust and reduce participation in the sport.	
69. Alan Clowers, Fishing Guide, 2/13/2025	69-a. I agree with everyone’s comments. 69-b. There's many kids that can't afford to go offshore and I've taken hundreds of kids on my little skiff to fish for BSB. 69-c. I plead with you guys to keep it at five fish and I do not agree with the people that said to reduce it to four, I believe it should stay at five. 69-d. I see flocks and flocks of flocks BSB out there and please don't take this away from the kids.	69-a. Comment noted. 69-b. See response 2-j. 69-c. Comment noted. 69-d. Comment noted.

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70. Caller 767, 2/13/2025	70-a. I agree with all the prior callers. 70-b. I'm just asking you to not ban us from more civil liberties that we should have. You're not using science. You're not going and actually finding where the fish are. You're going out and fishing wherever they're not.	70-a. Comment noted. 70-b. See responses 2-d, 2-g, 3-e, and 8-c.
71. Lyall Bellquist, 2/14/25	71-a. Many public commentors have been saying the conservation concerns regarding BSB populations are only based on catch rates, which is untrue; the concern is based on numerous scientific data sources (both fishery-dependent and fishery-independent). 71-b. All the information/data combined illustrates two major points of concern: 1) intense fishing pressure at documented aggregation sites was followed by the collapse in BSB catch metrics, and a decade-long absence of spawning aggregations, and 2) recruitment events are highly inconsistent and depend on specific oceanographic conditions. 71-c. Some public comments suggested that spawning aggregations are "unverified' or "anecdotal" or based on a single study, which is untrue; all of us have personal experiences, there are multiple studies, multiple spatial data analyses, and video evidence that all confirms the existence	71-a. Comment noted. See response 2-c and 2-d. 71-b. Comment noted. 71-c. See comment 27-a. 71-d. Comment noted. 71-e. Comment noted. See response 2-h. 71-f. Comment noted. See response 2-g. 71-g. Comment noted. 71-h. Comment noted. 71-i. Comment noted.

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	of these summer aggregations and the targeting of these sites by fishing fleets. 71-d. Photos of sub-legal fish were used as evidence of strong recruitment, but they actually support scientific findings of "pulse recruitment"; recruitment occurs in cycles, with a current pulse into the fishery expected to last from 2022-2028, after which another decade-long period of low recruitment could occur; without regulation, overfishing during this pulse could lead to another population crash. 71-e. Some claim there is insufficient tagging data, but BSB have been studied extensively, including three large-scale tag-recapture programs (1960s, 1990, 2010s) and several acoustic tagging studies (at least eight published BSB tagging studies since 2010); best available science from all studies combined shows BSB are not highly migratory beyond seasonal spawning movements. 71-f. Agrees a formal stock assessment is lacking and multiple publications have called for one, but we do not need a stock assessment to tell us the aggregations have disappeared, the catch and size structure were both hyperstable, the landings declined by over 90% relative to the 2005-2007	

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	peak, and the spawning stock biomass has been significantly reduced. 71-g. Meaningful management decisions are needed now, not later. 71-h. If a stock assessment is conducted it needs to explicitly account for "hyperstability" in both catch and age/length data. 71-i. Pictures, figures, and citations were included throughout the letter.	

CITY OF DANA POINT

CITY COUNCIL

Matthew Pagano
Mayor

John Gabbard
Mayor Pro Tem

Jamey M. Federico

Mike Frost

Michael Villar

February 18, 2025

California Fish and Game Commission
P.O. Box 944209 Sacramento, CA 94244-2090

Subject: Letter of Concern Regarding Proposed Amendments to Regulations for the Recreational Barred Sand Bass Fishery

Dear Commissioners,

The City of Dana Point is home to a thriving coastal zone that hosts thousands of anglers annually. We are writing to express our concern regarding the proposed amendments to recreational fishing regulations for barred sand bass (*Paralabrax nebulifer*). While we understand the necessity of taking precautionary measures to ensure the sustainability of this important fish species, we believe it is essential to consider the broader implications of these regulatory changes on our local fishing community.

The City of Dana Point values its coastal resources and the recreational fishing activities that contribute significantly to our local economy and community engagement. Barred sand bass is a sought-after species for many anglers and fishing charter operators, who rely on this fish as a primary target during peak fishing seasons. A reduction in bag limits and potential restrictions could impact the livelihoods of local businesses and may discourage recreational fishing participation in our waters.

Furthermore, we encourage the California Department of Fish and Wildlife (CDFW) to maintain open lines of communication with local stakeholders. Input from the fishing community is vital in shaping effective management strategies that account for both ecological sustainability and the values of the residents and businesses that rely on these resources. It is important to note that the affected community includes anglers fishing from piers, breakwaters, kayaks, small boats, and commercial passenger boats. We hope that there has been adequate outreach to these groups and that their input, along with scientific data, is being considered in the decision-making process.

We are also concerned about the need for enhanced scientific data to monitor and understand the barred sand bass population dynamics. Addressing factors beyond fishing pressure, such as environmental changes and habitat conditions, will be essential for implementing successful management measures. We request that the CDFW consider flexible approaches that may include gear regulations, monitoring initiatives, or targeted outreach programs.

The City of Dana Point is committed to supporting sustainable practices while ensuring that our fishing community continues to thrive. We sincerely hope that the Commission will take these concerns into account as it deliberates on the proposed amendments.

Thank you for your attention to this important matter. We look forward to your response and appreciate your continued efforts to balance conservation with the interests of our local communities.

Sincerely,

Matthew Pagano
Mayor
City of Dana Point

Outlook

public comment re: Barred Sand Bass

From Bellquist, Lyall [redacted]
Date Tue 02/11/2025 08:38 AM
To FGC <FGC@fgc.ca.gov>

Dear California Fish and Game Commission,

Please find the attached letter for public comment regarding the potential rulemaking in the California recreational Barred Sand Bass fishery.

Sincerely,
Lyall Bellquist, PhD

Public comment on proposed regulation changes to the recreational Barred Sand Bass (BSB) fishery

February 11, 2025

Dear California Fish and Game Commission,

This letter is submitted in reference to the Notice for new regulations in the Barred Sand Bass fishery.

I am a lifelong recreational fisherman and diver, deriving decades of enjoyment, inspiration, as well as my entire professional career from our unique, dynamic, and healthy marine ecosystems in California. I hold a B.S. in aquatic biology from UC Santa Barbara (2002), M.S. in marine biology from CSU Long Beach (2006), and Ph.D. in marine biology from Scripps Institution of Oceanography (2015). Throughout my career, I have worked collaboratively in industry, academic, federal agency, small NGO, and global NGO landscapes, most recently as a former Senior Fisheries Scientist with The Nature Conservancy, California Oceans Program and Visiting Scientist at Scripps Institution of Oceanography. My background has given me a diverse portfolio of expertise and stakeholder lenses to draw from, particularly regarding marine recreational fisheries management.

In the context of the proposed Barred Sand Bass (BSB) rulemaking, I have been involved in multiple collaborative fisheries research projects that have contributed data related to the BSB fishery, and I participated in the CDFW-led collaborative BSB working group that began in early 2024. For historical context, I fished for BSB here in the 1990s and early 2000s, when over 1M fish were caught annually by the CPFVs and private vessels combined; I was here during the BSB fishery decline from 2007-2012; I watched the BSB spawning aggregations disappear from 2012-2014, remaining absent from 2014-2023; and I saw the nascent emergence of the first new cohort in the last decade during this year's summer spawning season, which was heavily fished under status quo regulations.

In consideration of a potential rulemaking for BSB, there are several data-driven points that we did not necessarily have during the previous rulemaking in 2013:

1. **Today, the BSB recreational fishery in southern California is not data-limited** – There are approximately 30 peer-reviewed publications focusing directly or indirectly on this species since 2000; CDFW manages an extensive time series of reliable and widely-used fishery-dependent data for the two primary modes of BSB fishing mortality, i.e. private vessels and Commercial Passenger Fishing Vessels; there are several sources of fishery-independent datasets and time series from well-established data collection programs (e.g., CalCOFI, CCFRP, hydroacoustic surveys, and multiple subtidal survey programs); and oceanographic monitoring datasets have successfully been integrated with analyses on the BSB fishery to understand the relative importance of both fishing and the environment on population dynamics for this species. **Our understanding of the health of the BSB fishery comes from numerous sources of rigorous and collaborative science, all of which are in agreement about the decline of the fishery from 2007-2012 and the sustained collapse from 2012-2023.**

2. **We did not do enough in 2013 to rebuild the BSB fishery** – In 2013, the California F&G Commission recognized two primary concerns raised by CDFW in the recreational coastal bass fisheries: 1) gradual, long-term decline in Kelp Bass populations over the previous decades, and

2) a precipitous decline in BSB populations from 2007-2012. The Commission expressed particular concern about BSB due to their high vulnerability to overfishing during spawning aggregations. During the management process, CDFW provided a range of potential regulatory options (including a partial spawning season closure). The Commission instead chose to adjust bag and size limits, reducing the recreational daily bag limit in half from 10 to 5 fish per person per day, and increased the minimum size limit from 12 to 14 inches for all three bass species.

We now know that these bag/size limit regulations resulted in:

1. Strong success with Kelp Bass recovery, illustrated by catches and sizes recovering approximately 4 years later (as predicted), which is supported in the scientific literature and by the recreational fishing community
2. Failure for BSB recovery, illustrated by the continued BSB decline, disappearance of all known spawning aggregations, and effective fishery collapse from 2013-2023 (this is supported by several recent scientific publications authored by researchers from numerous academic research institutions and management agencies)

3. **We have a new opportunity in 2024** – In recognition of the Kelp Bass success story but the BSB failure, the renewed focus on BSB is especially timely for two reasons: 1) the last decade of BSB fishery collapse indicates that stronger management intervention is necessary to rebuild and sustain the spawning stock, and 2) a small recruitment pulse was observed (and heavily fished) this last summer during spawning season, indicating that we have a window of opportunity to conserve the incoming spawning potential, which could accelerate the rebuilding timeline. This pulse is comprised primarily of fish that were born during the 2014-2017 marine heatwave and subsequent El Niño. In other words, **this species is trying to rebuild itself under the recent favorable environmental conditions, but the fishery continues to target the spawning aggregations under status quo regulations with highly predictable consequences.** This is especially problematic given that the best available science shows that this recruitment pulse has no additional cohorts coming behind it, so our opportunity to conserve the nascent spawning stock biomass is now.

4. **A June-August spawning season closure would allow the fishery to rebuild** – In recognition of the fishery conservation opportunity before us, CDFW has been leading a collaborative working group with academics and recreational industry representatives. This discussion started with a science-based proposal by CDFW to implement a spawning season closure combined with a non-spawning season bag limit reduction, but after industry input, this evolved into an evaluation of bag limit reduction scenarios. An important question to ask ourselves: **If a 5-fish reduction (plus a 2-inch size limit increase) didn't work for BSB in 2013, then why would we expect another partial reduction to have any effect today?** We can evaluate the nuances of catch savings under 1-5 fish scenarios, but we already know that extreme catch savings in the short-term are necessary for the BSB fishery to rebuild.

5. **Spawning season closures are common, both globally and in California, for conserving spawning stocks** – Based on the best available science as well as lessons that we now have from other spawning aggregations around the world (e.g., Nassau Grouper in the Caribbean),

spawning season closures are common for a variety of reasons, particularly the conservation of the spawning stock for aggregating species. **Even for non-aggregating species, California already has spawning season closures/regulations in place for multiple fisheries** (e.g., spawning season closures are already successfully used in CA for rockfishes, lingcod, cabezon, spiny lobster, grunion; and a reduced bag limit exists for white seabass during spawning season). Implementing a spawning season closure would not represent a new type of regulation among California state-managed fisheries.

6. **A seasonal closure will not cause significant hardship to the recreational fishing industry** – Past hardship to the fleet was likely incurred predominantly during the 2007-2012 period when BSB landings declined precipitously. At that point, the loss of BSB spawning aggregations forced the subset of CPFVs that target BSB (i.e. half- and three-quarter day CPFVs operating between Ventura and San Diego) to shift toward other species, such as rockfishes. This shift allowed the vessels to continue operating successfully in the virtual absence of BSB landings from 2013-2023. We thus already have a decade of fishery evidence that the fleet can successfully navigate a June-August spawning season closure because **these vessels already operated successfully from 2013-2023 when BSB aggregations were absent after the fishery closed itself under status quo regulations. A seasonal closure would thus not add any hardship that hasn't already been successfully navigated by the fleet for the last decade.**

In summary, the best available science and our past lessons learned indicate:

1. Based on the Kelp Bass success story, management measures that appropriately account for the life history of the focal species can rebuild popular nearshore fisheries in southern California within relatively short time frames (e.g., 5 years for Kelp Bass).
2. Stronger measures are needed to recover BSB spawning aggregations and rebuild the fishery, and the best available science suggests a Jun-Aug spawning season closure is the best option.
3. There is no industry impact associated with a summer closure for BSB that the fleet hasn't already successfully navigated during the last ten years of fishery collapse.
4. Development of a stock assessment for BSB while interim conservation measures are implemented over a three-year period would be extremely helpful for clarification of stock status, streamlining decision-making, minimizing debates and mistrust between fishery stakeholders, and reducing current management decision lags in this highly important fishery.
5. **With this new fishery rebuilding opportunity, we can choose to spend down the principal like we did in the past, or we can conserve it and live off the dividends.**

Sincerely,

Lyall Bellquist, PhD

Timeline of BSB fishery-relevant publications beginning in 1996:

1. Love, M.S., Brooks, A., Busatto, D., Stephens, J. and Gregory, P.A., 1996. Aspects of the life histories of the kelp bass, *Paralabrax clathratus*, and barred sand bass, *P. nebulifer*, from the southern California Bight. Fishery Bulletin, 94(3), pp.472-481.
2. Love, M.S., Brooks, A. and Ally, J.R.R., 1996. An analysis of commercial passenger fishing vessel fisheries for kelp bass and barred sand bass in the Southern California Bight. California Fish and Game, 82(3), pp.105-121.
3. Baca-Hovey, C. and Cooper, L.D., 2001. Reproductive biology of the barred sand bass (*Paralabrax nebulifer*). SCCWRP.
4. Hovey, C.B., Allen, L.G. and Hovey, T.E., 2002. The reproductive pattern of barred sand bass (*Paralabrax nebulifer*) from southern California. California Cooperative Oceanic Fisheries Investigations Report, pp.174-181.
5. Mendoza-Carranza, M. and Rosales-Casian, J.A., 2002. Feeding ecology of juvenile kelp bass (*Paralabrax clathratus*) and barred sand bass (*P. nebulifer*) in Punta Banda Estuary, Baja California, Mexico. Bulletin of the Southern CA Academy of Sciences, 101(3), pp.103-117.
6. Avendaño-Ibarra, R., Hernández-Rivas, M.E. and de Silva-Dávila, R., 2009. Reproductive strategies of sea basses based on larval abundance in Magdalena Bay, Mexico, 1982–1986. North American Journal of Fisheries Management, 29(1), pp.205-215.
7. Allen, L.G., 2010. The impact of intense recreational fishing pressure on spawning aggregations of barred sand bass (*Paralabrax nebulifer*) off the Los Angeles Metropolitan Area.
8. Jarvis, E.T., Linardich, C. and Valle, C.F., 2010. Spawning-related movements of barred sand bass, *Paralabrax nebulifer*, in southern California: interpretations from two decades of historical tag and recapture data. Bulletin, Southern California Academy of Sciences, 109(3), pp.123-143.
9. Mason, T.J. and Lowe, C.G., 2010. Home range, habitat use, and site fidelity of barred sand bass within a southern California marine protected area. Fisheries Research, 106(1), pp.93-101.
10. Erisman, B.E., Allen, L.G., Claisse, J.T., Pondella, D.J., Miller, E.F. and Murray, J.H., 2011. The illusion of plenty: hyperstability masks collapses in two recreational fisheries that target fish spawning aggregations. Canadian Journal of Fisheries and Aquatic Sciences, 68(10), pp.1705-1716.
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12. Jarvis, E.T., Loke-Smith, K.A., Evans, K., Kloppe, R.E., Young, K.A. and Valle, C.F., 2014. Reproductive potential and spawning periodicity in barred sand bass (*Paralabrax nebulifer*) from the San Pedro Shelf, southern California. California Fish and Game, 100(2), pp.289-309.
13. Jarvis, E.T., Gliniak, H.L. and Valle, C.F., 2014. Effects of fishing and the environment on the long-term sustainability of the recreational saltwater bass fishery in southern California. California Fish and Game, 100(2), pp.234-259.
14. McKinzie, M.K., Jarvis, E.T. and Lowe, C.G., 2014. Fine-scale horizontal and vertical movement of barred sand bass, *Paralabrax nebulifer*, during spawning and non-spawning seasons. Fisheries research, 150, pp.66-75.
15. Miller, E.F. and Erisman, B., 2014. Long-term trends of southern California's kelp and barred sand bass populations: a fishery-independent assessment. California Cooperative Oceanic Fisheries Investigations Reports, 55, pp.1-9.

16. Bellquist, L.F., 2015. A historical perspective of California recreational fisheries using a new database of" trophy" fish records (1966-2013), combined with fisheries analyses of three species in the genus Paralabrax. University of California, San Diego.
17. Patterson, C.N., Chabot, C.L., Robertson, J.M., Erisman, B., Cota-Nieto, J.J. and Allen, L.G. 2015. The genetic diversity and population structure of Barred Sand Bass, Paralabrax nebulifer: a historically important fisheries species off southern and Baja California. CalCOFI Rep. vol. 56
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19. Bellquist, L. and Semmens, B.X., 2016. Temporal and spatial dynamics of 'trophy'-sized demersal fishes off the California (USA) coast, 1966 to 2013. Marine Ecology Progress Series, 547, pp.1-18.
20. Erisman, B.E., Cota-Nieto, J.J., Moreno-Báez, M. and Aburto-Oropeza, O., 2017. Vulnerability of spawning aggregations of a coastal marine fish to a small-scale fishery. Marine Biology, 164, pp.1-18.
21. Bellquist, L., Semmens, B., Stohs, S. and Siddall, A., 2017. Impacts of recently implemented recreational fisheries regulations on the Commercial Passenger Fishing Vessel fishery for Paralabrax sp. in California. Marine Policy, 86, pp.134-143.
22. Won, C., 2018. Spatial and temporal effects of lunar phase and sea surface temperature on spawning Barred Sand Bass (Paralabrax nebulifer) off Huntington Beach, CA (Doctoral dissertation, California State University, Northridge).
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24. Davis, J.P., Valle, C.F., Haggerty, M.B. and Gliniak, H.L., 2019. Comparing video and visual survey techniques for Barred Sand Bass in rocky reef ecotone habitats. California Fish and Game, 105(4), pp.233-253.
25. Logan, R.K. and Lowe, C.G., 2019. Space use and inferred spawning activity of three exploited gamefish species on a large artificial reef. Fisheries Management and Ecology, 26(6), pp.558-569.
26. Allen, L.G., Won, C., Bolser, D.G. and Erisman, B.E., 2020. Feasibility of hydroacoustic surveys of spawning aggregations for monitoring Barred Sand Bass populations off southern California. Calif Fish Wildl, 106, pp.139-155.
27. Walker, K.M., Penttila, K.M., Jarvis-Mason, E.T. and Valle, C.F., 2020. Validated age and growth of barred sand bass within the Southern California Bight. Calif Fish Wildl J, 106, pp.205-220.
28. Mason, E.T.J., Watson, W., Ward, E.J., Thompson, A.R. and Semmens, B.X., 2023. Environment-driven trends in fish larval abundance predict fishery recruitment in two temperate reef congeners: Mechanisms and implications for fishery recovery under a changing ocean. bioRxiv, pp.2023-10.
29. Mason, E.T., 2023. Reconstructing the population dynamics of southern California Paralabrax spp. in the face of a changing ocean. University of California, San Diego.
30. Mason, E.T.J., Riecke, T.V., Bellquist, L.F., Pondella II, D.J. and Semmens, B.X., 2024. Recruitment limitation increases susceptibility to fishing-induced collapse in a spawning aggregation fishery. Marine Ecology Progress Series, 738, pp.203-224.
31. Coscino, C.L., Bellquist, L., Harford, W.J. and Semmens, B.X., 2024. Influence of life history characteristics on data-limited stock status assertions and minimum size limit evaluations using Length-Based Spawning Potential Ratio (LBSPR). Fisheries Research, 276, p.107036.

Outlook

public comment re: barred sand bass

From Bellquist, Lyall [redacted]
Date Wed 04/02/2025 07:26 PM
To FGC <FGC@fgc.ca.gov>

Dear California Fish and Game Commission,

Please find the attached letter for public comment regarding the potential rulemaking in the California recreational Barred Sand Bass fishery.

Sincerely,
Lyall Bellquist, PhD

Public comment on proposed changes to recreational Barred Sand Bass (BSB) fishery regulations

April 2, 2025

Dear California Fish and Game Commission,

The California Marine Life Management Act (MLMA) places the burden of proof onto the state management process to demonstrate that the recreational barred sand bass fishery is sustainable, which has not been accomplished. To the contrary, the California Department of Fish and Wildlife (CDFW) demonstrated during the last year of working group discussions that the fishery declined precipitously from approximately 2007 to 2013, remained virtually absent from 2013-2023, and exhibited nascent emergence in summer of 2024 (which scientists predicted), reaching landings last year of only about 6% of the historical peak. **The California MLMA also "strongly emphasizes science-based management (CDFW, 2025)," but the full Commission has only been given a single, brief barred sand bass science presentation (only 15 slides) from CDFW during the December 2024 meeting** (prior CDFW science presentations were reserved to the MRC meetings and working group meetings only). While the December presentation was very informative and did initiate discussion, it did not include fundamentally important recruitment information that was published on Barred Sand Bass during the last year (Mason et al. 2024, 2025). Simply put, the historical peak of over 1M fish landed (CPFVs and private vessels combined) annually from only five known spawning sites, followed by a precipitous decline due to documented hyperstability, near-decade-long virtual absence of the fishery, disappearance of spawning aggregations, long periods of failed larval recruitment, and heavy status quo targeting of the incoming fishery recruitment pulse in 2024, **does not constitute sustainability. The several available data sources and publications indicate that the barred sand bass fishery is not sustainable, and meaningful management action for is needed for this fishery, yet the best available science has not been presented to the Commission**.

The available science relevant to barred sand bass was also not presented during the second full Commission meeting on this issue (in Feb 2025) – rather, the available science became a target of what appeared to be public misinterpretation of larval, juvenile, and fishery recruitment. During that meeting, anecdotal fishing community comments, claims, photos, and videos heavily influenced the discussion, but **it wasn't made clear during the meeting that these anecdotal references actually support the available science**, rather than refute it as most stakeholders seemed to perceive. The full Commission and the fishing public have thus not been provided a comprehensive scientific understanding of the dual problem faced by the barred sand bass fishery, and **it was not communicated to the full Commission or to the public that the anecdotal information and the available science are actually very well aligned, and they point to the same need for meaningful management action**.

Approximately one year ago, I was invited by both CDFW and the Sportfishing Association of California (SAC) to join the collaborative working group comprised primarily of recreational fishing industry representatives and CDFW marine fishery biologists. Based on the available science, a long history of collaborations with the fishing fleet, and several independent data sources indicating a need for conservation measures in this fishery, CDFW initiated working group discussions by proposing a 3-month spawning season bag limit of 0 fish, and a 2-fish limit during the remainder of the year. During the November 2024 MRC meeting and the December 2024 full Commission meeting, CDFW estimated that this proposed measure would offer a 76.1% annual catch savings for barred sand bass. However, after side meetings between CDFW and recreational

industry representatives, CDFW shifted to a far less impactful recommendation of a 1-fish year-round reduction in the daily bag limit (i.e. from 5 fish/day to 4 fish/day) – CDFW demonstrated that this would only offer a 3.5% annual catch savings (based on 2023 data). This means that CDFW has not demonstrated that the fishery is sustainable as required by the MLMA, and has not presented the full body of science that is fundamentally important to the barred sand bass fishery as is emphasized by the MLMA – instead, CDFW has demonstrated that the fishery is in need of meaningful conservation action, but they reduced their recommendation from a 76.1% catch savings to only a 3.5% catch savings. **We already know that a 3.5% reduction in catch will not provide meaningful conservation impact, and if sustainability in this fishery cannot be demonstrated, then greater catch savings than 3.5% are needed until a stock assessment can provide clearer guidance for management of this fishery. Since 2013, this is now the second time that CDFW has proposed seasonal spawning protections (despite subsequently walking this recommendation back). Do we sincerely want to go on record as twice kicking the can down the road when we know the fishery is not sustainable? The amount and alignment of science and anecdotal information we have for barred sand bass, most of which point to the need for spawning season protections, would enable a clear rulemaking in any other fishery.**

Lastly, I'd like to share a story about barred sand bass tagging efforts in one study (Bellquist 2015), and how the SAC vessel captains perceived the barred sand bass fishery health during the years that followed (from Bellquist et al. 2017). From 2012-2014, I led a tagging project in collaboration with SAC, with the objective of understanding kelp bass and barred sand bass demographics and movements patterns. This project occurred at the time when both kelp bass and barred sand bass were already being recognized by CDFW for needed management action. With funding from the state of California, I worked collaboratively with the SAC fleet, and conducted 51 scientific fishing charters aboard 12 Commercial Passenger Fishing Vessels (CPFVs, i.e. 'party-boats'). Working with 13 different CPFV captains over a two-year period, we tagged a total of 12,581 kelp bass, gaining critically important information about that species. However, we were only able to tag 1079 barred sand bass, despite searching repeatedly at their known spawning sites during peak spawning season. We searched at known aggregation sites off Huntington Beach, Oceanside, and Imperial Beach, but none of the captains were able to find concentrations of spawning fish that we had all experienced while fishing in years prior. Our mutual realization that the aggregations had disappeared coastwide informed a new study (Bellquist et al. 2017), in which we again worked collaboratively with SAC, and surveyed almost all of the ½-day and ¾-day captains operating at that time. Of the 50 captains identified by SAC, we successfully surveyed 45 of them – this 90% coverage still represents the most comprehensive synthesis of captains' perspectives on the kelp bass and barred sand bass fishery to date. These surveys, which were designed specifically to understand the captains' perceptions of fishery health for both kelp bass and barred sand bass, equated to over 500 captain-years of experience targeting both bass species. In this study, 93% of the captains considered Kelp Bass to be important to the recreational fleet, and 84% of them believed the stock was healthy or very healthy. However, while 95% of the captains considered Barred Sand Bass to be important to the recreational fleet, only 60% of the vessel captains believed the stock was healthy or very healthy. **There was thus a clear recognition by the CPFV captains that the barred sand bass fishery was less healthy than the kelp bass fishery.** During the years that followed, the aggregations remained absent, and the fleet successfully navigated this spawning stock disappearance by focusing on several other species, such as rockfishes, kelp bass, and offshore pelagic species. Last year, sand bass landings inched up to only about 6% of their historical peak. However, in the face of potential new restrictions, the fleet changed their perception of barred sand bass stock health despite what the best available science indicates.

Nobody, including myself, wants to close the spawning season for this fishery, but the impact is clear, the need is clear, the science is abundant and clear, and information from the fleet is in alignment with this despite previous arguments. There is a reason why we protect spawning seasons and grounds for so many species around the world – vulnerability to overharvest is simply too high in some cases.

Sincerely,

Lyall Bellquist, PhD

Literature cited:

Bellquist, L.F., 2015. A historical perspective of California recreational fisheries using a new database of" trophy" fish records (1966-2013), combined with fisheries analyses of three species in the genus *Paralabrax*. University of California, San Diego.

Bellquist, L., Semmens, B., Stohs, S. and Siddall, A., 2017. Impacts of recently implemented recreational fisheries regulations on the Commercial Passenger Fishing Vessel fishery for *Paralabrax sp*. in California. Marine Policy, 86, pp.134-143.

Mason, E.T.J., Riecke, T.V., Bellquist, L.F., Pondella II, D.J. and Semmens, B.X., 2024. Recruitment limitation increases susceptibility to fishing-induced collapse in a spawning aggregation fishery. Marine Ecology Progress Series, 738, pp.203-224.

Jarvis Mason, E.T., Watson, W., Ward, E.J., Thompson, A.R. and Semmens, B.X., 2025. Environment-driven trends in larval abundance predict fishery recruitment in two saltwater basses. ICES Journal of Marine Science, 82(2), p.fsae196.

Outlook

Barred sand bass closure

From David Alatorre [redacted]
Date Tue 02/11/2025 01:45 PM
To FGC <FGC@fgc.ca.gov>

Hello,

My name is David Alatorre, a saltwater fisherman from Palmdale California currently deployed half a world away. I'd like to explain my experience with the barres Sand bass in my local Long Beach fishery. Sand bass in my opinion are an introduction fish and should not be chosen as a no take fish. They are often caught as a bycatch when targeting other species. Once you hook up with one, you're likely going to continue hooking up with more. They are a wonderful fish to catch when there's someone new on the boat and they want to catch thier first "big" fish. That's how I felt when I was first introduced to sportfishing.
I don't think any half day charter boat could survive without the barred sand bass. It would shift the weight to other local species like sculpin and calico bass. Not forgetting to mention, how could a sport like this be introduced to new anglers of all ages without the barred sand bass. A half day boat would become obsolete, no longer able to effectively leave the harbor and show "new comers" a great day of fishing with minimal effort and technique.
Everyone looks forward to fishing and more so when a family can incorporate into their weekend schedule. Without the half day am or pm boats having the barred sand bass to fish, the future of sportfishing would be in jeopardy.
As a fisherman I personally don't keep the barred sand bass when I go fishing, I understand the importance of conservation and I know there's better, fun fish to catch but when I stare at the cattle boats of people leaning over the rail and screaming in excitement over the fish in my local area. I remember when I was that guy, stoked to land a bass, take it home and show off my catch. Fish tacos caught, not bought and I can't image a life without those moments and I have the barred sand bass to thank. It's memories like those that kept me coming back. It would be a sad closing to that chapter for the California angler.

Sent from my iPhone

Outlook

Sand bass support

From Austin Carter [redacted]
Date Tue 02/11/2025 04:40 PM
To FGC <FGC@fgc.ca.gov>

Dear California,

I am writing to express my concern regarding the potential closure or restriction of sand bass fishing in California. As a passionate angler, business owner, and advocate for sustainable fishing practices, I believe maintaining access to this valuable fishery is essential for both recreational and economic reasons.

Sand bass fishing is a treasured activity for countless anglers in California, providing not only recreational opportunities but also supporting local businesses, including charter services, tackle shops, and tourism. Restricting or closing this fishery would have significant economic consequences for these industries while also diminishing a beloved pastime for many.

I understand the importance of preserving fish populations and ensuring sustainability for future generations. I encourage the use of science-based management practices, such as seasonal regulations, size limits, and catch quotas, to balance conservation efforts with continued access to this resource. Responsible anglers are committed to protecting marine ecosystems and working alongside regulatory agencies to ensure the health of fish populations.

I kindly ask that you consider the social, cultural, and economic impacts of any decisions regarding sand bass fishing in California. By implementing balanced and science-driven management measures, we can achieve sustainable use while preserving the opportunity for anglers and businesses to thrive.

Thank you for your time and attention to this matter. I would appreciate the opportunity to discuss this further or provide any additional input if needed.

Sincerely,
[Austin carter]
[redacted]

Outlook

Sand Bass

From Wendy Tochihara [redacted]
Date Mon 02/10/2025 04:52 PM
To FGC <FGC@fgc.ca.gov>

Dear Fish & Game Commissioners,

Please see my attached petition opposing a sand bass closure.

Wendy Tochihara

[redacted]

Sand Bass Closure

To: California Fish & Game Commission

We, the undersigned, oppose the closing of sand bass fishing during the summer months. This extreme response to the uncertain need goes well beyond being a reasonable response. We feel it primarily serves to support a narrative popular within the academic community that any fishing during spawning is a bad idea. The reality is a dead fish is a dead fish, irrespective of when during the year it dies. Most fish do not provide parental care to their offspring. Sport fishing does not disrupt spawning.

Why is this important?

Sand bass are important to recreational anglers, children, veterans and especially those with less disposable income. The food value of our catch subsidizes the costs involved. Many pier and jetty anglers depend on their catch for sustenance. Sand bass are a highly prized catch.

Signed by 715 people:

Name	Zip code
Wendy Tochihara	92649
Mark Rojas	91750
David Saraye	90504
Michael Brennan	94553
Valerie Handzus	90680
IZMIR MOOR	92584
Merit McCrea	93103-1948
Rene Johnson	92647
William Johnson	92647
Sam De La Torre	90717
nate karney	92078
Dean Plant	92627
Brian Nguyen	91780
Steve Kunitake	90745
Laurie Garcia	90746
Thomas Golding	90732
Chris Wheaton	90650
Hernan Hernandez	93436
Alistair Curamen	90807

Name	Zip code
John Santaella	95542
Ernest Prieto	92054
Norm Campbell	92040
Kambiz Moradi	91342
Paul Haase	92646
Sam Fallah	91342
Robyn Yoshihiro	91942
Frank Garibay	92708
Grant Hendricks	92647
Kenichi Iida	92610
Robert casler	92021
Johnny Javier	94528
David Mahosky	92399
Michael Wolowicz	92585
Michael McCarty	90742
Michael Nguyen	92337
Shawn Albayati	92801
Shannon Anderson	94558
Jim Hendricks	90242
Chinh Nguyen	92683
Sam Neely	91390
Thomas Fitzgerald	91701
David Rosenthal	91355
Marcel Sampaga	92111
Gary Bond	92344
larry overton	90712
Derek Amaral	90808
Ron Owens	92867
Serg Fainsztein	92627
Ron Okada	92630
Bobby Martinez	90065

Name	Zip code
Andre Logie	95991
Huan Nguyen	92840
Joseph Schlater	92626
Aren Antounian	91335
Bruce Tallmon	90815
Ronald Bader	92011
Phillip Capriccio	91770
Virgil sunny Perez	92628
Mathew Curto	93427
Jeff Laws	92065
Angela Knight	95540
Myles Blatt	90292
Sean Froelich	92845
Matt Kotch	92646
Victor Castillo	90270
Julia Orozco	90280
Bob Hoose	92626
Hawley Smith	90680
Randall Corbin	93003
Ryan fillingane	92833
Anthony Rezzato	90230
Robert Praszker	94941
Mary Thompson	93033
Avo Asdourian	92649
Steven Ennis	92069
Brian Wilson	92021
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David Wolfson	84003
Steve Heath	90703
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Steve Nies	90815
Tony Kim	91316

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Mark Dobrilovic	92692
Eric Torres	93117
David Dodge	90740
Enrique Mireles	92649
Mike Marsh	92646
Weston Rhodes	93433
brad sanders	93561
Mike reader	90501
Kevin Cooney	92707
Sean Fitze	93305
Steve Sproule	90720
Mike Armenta	93003
Kurt Gerum	92647
Brendyn Clark	93030
Javier Godinez	93036
Mitchell Oliveira	93292
Jose Ortega	90620
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Richard Diehl	86426
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Greg Herman	88012
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Kevin Abshear	90605
Bobby Matsumoto	92308
David Brinsko	89510
Mathee Toscano	90660
Matt Newman	91360
Cody Kramer	92071
Jenn Majdi	92647
Eric Mccully	92065

Name	Zip code
Brad Gamble	95401
Alan HERMER	92649
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Luis Hernandez	93103
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Gavin czach	93035
Michael Killian	91350
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Robert Hara	90066
Diego Morales	93033
Theodore Ritter	93117
Ronnie Aguilera	92801
Richard Flores	93108
Randy Sasaki	93033
kurt bellefeuille	93117
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Howell Poe	90803
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Gary Geer	90660
Dennis Yamamoto	90720-4136
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Jorge Gonzalez	93035
Jonathan Edgar	90274
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Peter Mirelez	90620-4104
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Richard Sioson	90703
Oscar Ochoa	92407

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George Vanneman	92376
Eddie Aguirre	92708
James LEAHY	90813
Martin Ayala	90018
Douglas Elliott	85048
James Cook	92345
Steve Iwashita	90502
Ka Mo	90620
Alisa Garrett	92592
Rich DeCoudres	90720
Steve Leavitt	92260
Nicholas Fischer	90712
Joel Arledge	92120
Richard Ableser	90803
Tetsuo Fujioka	93111
Roy Fukushima	92867
Jim Jarvis	92691
Luke Burson	92677
Sophia Huynh	91304-3626
Andrew M Shimoda	91748-4795
Rodney Fischer	92227
David Obenauer	92627
Cor Claus	92649
Gary Turner	92870
Harold Hanevik	92307
Steve Cameron	99006-9603
Susan Campbell	92040
Chris Schmidt	93010
Chris Halliday	92649
Denis Mantei	92663
Bruce Lindemann	92660

Name	Zip code
Kevin Perlin	90802
Ian Rimando	91350
Richard Davis	90220
Timothy Marquez	90731
Matt Matsuno	90606-1132
Joseph San Jose	90815
Joel Shimizu	91748
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FRANK MORENO	90660
David Stone	90049
Chris Alcaraz	91722
Daniel Zuniga	90605
Roy Patterson	92691
alfred romo	93314
Fred Roberts	90242
James Bateman	92649-1803
Bob Bower	92609
Kevrette Johnson	90301
Dave Huebner	93109
John Trapani	92649
Jose Sandoval	90066
Jerry Velazquez	93033
Gary Mizuhara	91737
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Rick Peter	93110
Jason Palmieri	91942
Thomas Horne	93003
Derek Taguchi	92626
Dzung Duong	92782
Justin Wyndham	90712
Bob Miller	92630
Paul Mceachern	90803

Name	Zip code
Gustave Chabre	92661
Robert Woods	91755
JoAnne Naka	90505
Treve Bartlett	91731
Matthew Erny	90621
Kurt Schuster Kurt Schuster	92084
Andrew Anderson	92649
Luis Cervantes	90503
James Miltenberger	90606
Edwin Matibag	86324
Jeff Yoemans	91775
Ethan Hargett	90732
Robert Carlos Arriaga	92683
Jonathan Rohe	81521
Jan Packard	90274
daniel black	92649
Andrew Deal	92649
PAUL SOUTHGATE	90275
Dave Morin	93060
Daniel Lee	91709
darren Morris	92646
Matthew Groff	90245
Donald Watanabe	90744
Sergio Marquez	90703
David Cox	92887
Tim Ogilvie	92082
Matt Borgen	90720
Melvin Sanford	92139
Jesus Barrios Jesus Barrios	90813
Terry Tysseland	92648

Name	Zip code
Patricia Miltenberger	90606
John Maxwell	90740
Matthew Fitch	92399
Charlette Amaral	90808
Kevin Meyer	92054
David Smith	92648
Ricardo Fuentes	90501
Christopher Imbro	90717
steve hall	90620
Paul Ito	90247
Mark Thomann	92691
Richmond Cancino	90755
Ann Ito	90247
Jed Venture	90808
David Jew	91350
Gary Van Eede	90713
Tom Furukawa	90039
Tomas Gurklys	93551
Tom Farrell	93010
Gerry Quesnel	92841
Travis Iiyama	92054
Erik Mason	93022
Tyler Doan	92806
Greg Morey	90808
Larry Dickson	90732
Kristy Morey	90808
Sean Murphy	93003
Steven Childs	91010
STEVEN FARMER	90710-1213
Jeffrey Hacker	92646
Timothy Stengel	92117

Name	Zip code
Janette Fuson	92359
Joseph Fries	92359
Bentley Kerr	92602
Norman Rodriguez	90018
Casey Mccann	92626
Alejandro Orozco	92544
Greg Gin	90814
Tom Muehleman	92119
Steve Mccolley	92081
Christopher McClary	92627
Joel Quinonez	92071
Bryan Szal	93003
Kaleb Basilio	92010
Keith Hernandez	92704
John Mcvicars	92595
CHUCK KELMAN	91301
Paul Douglas	93111
Walter Buitrago	92833
Dwayne Patenaude	92071
Larry Heron	93010
Eddy Shook	92054
Steve Brunton	92071
Alan Ruud	92863-7233
Richard Buitrago	93238
Leonard Odum	92677
ALEJANDRO BUITRAGO	90404
Nicholas Ramirez	90250
Charles Wheeler	92110
Bill Varney	92647
Debra Patenaude	92071

Name	Zip code
bruce marshall	91977
Boon Fukumori	90703
Gary Mouritzen	92106
Robert Groeber	93041
Casey Casad	92064
JOSEPH JEFFREY	92845
Samuel Holt	90250
Rodney Aoto	90717
Roger Stephenson	91350
David Rehrer	92308
Chris Maudlin	91911
willie kim	92886
Brice Bossler	92107
Sam King	92019
Tamralyn Shepphird	93065
Peter Bovey	90066
Sammy Garcia	92704
Patrick Krogman	92708
dan clause	93103
Sunny Ton	91776
einar aguila	92113
Gerald Edwards	92123
Timothy Hunt	90650
Joseph Vicic	92649
Aaron Orsini	98223
Len Alfuente	92126
Richard Jahn	90815
Jay Sklar	92057
Albert Lee	92882
Andrew Shuttleworth	92114
Henry Bouldin	92821

Name	Zip code
Mike Smith	94931
Joaquin Mccollum	91902
Stephen Hanano	92869
Clayton Silver	92660
Kyoko Dollar	92078
Warren Shuttleworth	92114
David Kodama	92129
Jonathan Gunther	91311
Gregory Cohan	91406
James Carlisle	90803
Todd Johnson	92626
Jacob Aho	92821
Matthew Finney	92595
Bryan Yamamoto	91754
Donald Fromberg	93010
Vincent Orsini	94923
Brandon Blakley	98223
pete jurczyk	93436
Dennis Friedman	92508
Adam Tucker	92688
Dane Freeland	92109
Bryan Freeland	92109-1405
Daniel Razo	93105
Margaret Temple	95608
Kyle Thomas	93035
Kit VanRiel	89081
Erik Mortenson	92882
Michael Kelly	95407
Robert Jenkins	92011
richard vantine	85367
Howard Folmer	90249
Andrew Ratzky	91302

Name	Zip code
Mark Suyetsugu	90230
Mark Romero	90063
Malachi Jones	92101
Chris Matthews	92660
Nichole Snorteland	98223
Richard Braswell	92604
Carlos Mosquera	92563
Kathleen Orsini	92106
Tim Joe	91320
Christina Cost	92024
Bryan Salvati	92591
Keith Lambert	90066
Tom white	92780
Randy Pauly	93420
Curtis Woolsey	92587
Stephanie McIntyre	98270
Zach Arnold	98201
Louis Mascola	90275
Rick Hausman	92009
randy jacobs	92065
karl h	95403
Blake Schoemann	93012
Jessica Huff	93001
Garrett Ching	90041
Leo Ruiz	90606
cody jeske	91790
David COOPMAN	92648
Javier Lazo	91767
Nathan Kolender	92117
Andrew Warren	92071
Joe Oyama	92111

Name	Zip code
Sean Hayes	93308
Daniel Jimenez	91801
James Jacobs	92126
Michael Howell	92844
Scott Willis	91942
PAUL ROMANOWSKI	92703
Michael Carrasco	95383
Alfred Edwards	92376
Ronald McMillian	89014
Sabrina Roncancio	95472
Rich Prater	92865
Chris Bragg	91932
Bill Boyce	91390
Paul Lombardo	90604
Patrick Antonius	92108
Bruce Freeman	91040
Scott McCall	92805
Tim Deveau	92571
Robert Gossett	92883
Christian Miner	90620
Cesar Zanelli	90731
Antonio Zanelli	90731
Sunny Trent	91902
Marcus Martinez	91786
Jodee Tochi	90623
James Stitt	93401
Eddie Azevedo	92111
john berner	92647
Amo Laupola	92584
David Grant	92057
john eddy	91701

Name	Zip code
Paul Weidmann	90703
Arnold Seko	92084
Hieu Vo	92692
Bill M	92082
Jenny Leung	92649
Vincent Ivicevic	92845
Rob Henson	90740
Bill Depriest	92660
Robert Williams	92109
Nathanael Verano	91104
Layne Uyeno	90038
James Mickelson	92009
Jeff Tom	91403
Steven Morris	93436
Stephen Loo	90631
Timothy Ayres	91411
Clifton Siebler	97870
Peggy Dodge	90740
Eric Ralls	91932-1212
Ned nakatsuka	92677
Terry Uchida	92024
Paul Pangan	90731
chris collins	93063
Albert Flores	90502
Kelli Capelouto	90731
Joey Engel	92675
Cory King	92029-4415
Keith Poe	90717
Harold Jacobson	92020
Bill Larkin	92649
Janine Curlee	92505
Georgia Oefinger	85207

Name	Zip code
Tim Dawson	86429
Bill Morris	92653
Rob Espinosa	92886
Bill Dean	92870
Silbermannn Bill	92345
Rachael Yamasaki	92128
Marshall Halperin	92691
Bruce Byrd	92703
Stacy McDannold	90064
John Bohrer	92653
Michelle Westcott	92882
Eric Ratliff	92129
Noe Sarmiento	92345
Alexandra Sarmiento	92345
Shawn McBride	92620
Brent Danna	92845
James Nelson	91911
Bill Cavanagh	90604
Bree Klusmeyer	92081
Wendi Brownell	93105
Sienns Berrocal	60618
Wanda Maclachlan	92055
Nicholas Johnston	92509
Jacob Martinez	91741
Mike Muellenberg	92648
Raul Lira	92107
Julie Hand	92083
Josiah Vander Poorten	91773
Kat Dumalski	90808
Kurt van der Linde	92677

Name	Zip code
Gary Brennan	92065-6408
Eddie Agundez	23570
John Otten	91784
Adam Verdugo	91750
Donna Kalez	92629
Lisa Phillips	92672
Michael Hansen	92672
Shane Hansen	92673
Laura Lopez	92705
Sean Healey	92648
Cole Taite	92648
Ryan Burson	92692
Justin McTeer	90605
Emil Beaird	90303
Miguel Virrueta	91744
Stan Vanderburg	93065
Benny Hallock	92627
Ken Vanderburg	91311
Nohl Almquist	92646
Marshall McCabe	92646
Jose Angulo	92630
Ryan McTeer	90603
Steven Karobkoff	91367
Miguel Pichardo	90003
Daniel Rivas	90631
Steven Gelhaus	34986
Sally Kurz	92677
Richard Kemler	91910
Scott Smith	92586
Doug Book	86303
Carhy Doesburg	93673
Joe Sotelo	90003

Name	Zip code
Robert Polzel	89122
Joel Salloway	90731
Calvin Deshler	93111-1450
Justen Giles	90806-3165
Victor Alarcon	90670
Tristan Burke	90745
Art Omar Quezada	92584
Salvador Jeronimo	90807
capt Michael w brown	90814
Stew Suenaga	90025
Gabriel Hernandez	90602
Randy Benner	92336
Kevin Munoz	91303
David Peter	92672
Peter Groesbeck	92128
Ryan Cowan	92708
Jaime cell128@yahoo.com	90810
ben okazaki	91754
Lorenzo Masciel	92805
Matthew McDonald	90808
Ashby Hurtado	90002
Peter Harris	91911
Mike Blom	92507
Susan Teague	91910
Whitney Uyeda	93427
Michael Fontana	92691
Rayne Pulmano	90630
Thomad Chavez	92117

Name	Zip code
Elsie Gamboa	92346
Raymond Chiu	91792
Steve Dillingham	92020
Christopher Hacker	95918
Paul Schlingensiepen	93117
Howard Hada	90703
Michael Stout	90503
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Keith Kawata	90504
Robert Kolb	92843
Jack raub	92673
Derek Alward	92675
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Darryl Oku	96822
Brian Drazba	92656
Brendan Hanley	92679
Tonie Bangos	92124
Mercedes Gonta	90803
Robert Villar	90803
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Dale Kurata	90701
Steven Stern	91303
larry huey	90266
Robert Cox	91911
James Duntley	90275
Jesse Perez	90706
Chris Silva	92506
Mary DiStefano	92672
Jason Castaneda	92064
De Nguyen	92844-2415
Andrew Wright	92110

Name	Zip code
David Brackmann	92649
Nicholas Ekdahl	91741
micah DiStefano	92672
Leo B	92661
Bernie Cervizzi	92020
franklin pratto	90005
Robert Calderon	90503
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James Johnson	92117
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John Campbell	93455
Darryl Despie	92027
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Benson Fox	92083
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Rose OBrien	90630
YOFAN GANTINO	91784
Sammy Prum	92807
Michael Yunich	92651
Chuy Peraza	90019
Alexandria Fox	92108
Taryn FRANDSEN	92081
Devin Feldman	92630
Alexis Siebelink	92083
LeeAnn Fox	92083
John Siebelink	92083
Francisco Bravoderueda	92504
Margaret Luikart	85364
Gerado Ixta	92780
Olivia Fox	92083
Joe Duval	90650
James McGinness	90620

Name	Zip code
Aaron hoberman	95726
Brian Siwecki	92678
Larry Crownover	92841
Tim Jarrett	92708
Loi Hua	91770
Blaine Doss	92407
Brandon McNaughton	92708
Darren Doskocil	92585
Victor Jarrett	92708
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Darren Clark	91350
Gary Cotter	93105
Bradley Bryant	92886
Rick Maurer	92869
Michael Pivovaroff	91745
Glenn Woodrum	92807
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Don Girskis	92672
Jeffrey Kaiser	92026
Cody Noble	91941
Joe Dopico	91354
Gene Tanji	92804
Cliff Bongianni	92120
Dylan Legere	92627
Jose Vargas	92024
Ryan Tracey	92109
Dean McVey	91724
Max Vandermeulen	92646
joel howard	92007

Name	Zip code
Mark Juarez	92113
Kirk Johnson	92028
Nathan Winton	93003
Kent Franke	92056
Jim Markham	90630
Jose Govea	91741-2124
Glen Mitchell	91016
Brian Petersen	91016
Coleman Mitchell	91016
Tyler Mitchell	91016
kelly smith	90742
Jack Vandermeulen	92646
Cole Kurimay	92879
Jake Kress	92649
Bradley Kreowski	92672
Matt Ryan	90713
Julian Vazquez	90503
Duran Salazar	92646
Wesley Alden	90505
Garett Yamaki	90249
David Chong	92835
Michael Wirasto	90277
Elijah Keane	92882
Eric Rosso	97478-9575
Terence Kirk	90291
Anthony Daquila	92647
Dan Sukal	90504
Christopher Turk	91775
Doug Snell	92592
Anthony Amoroso	92105
Roland Salazar	92879
Eddie Meyer	91730

Name	Zip code
Judith Simmons	90503
Jared Walker	90815
Morgan Hall	91326
trent Soudipour	92806
Theresa Hew	90807
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Jeremy Roberts	91737
Allen Anderson	93003
James Trotter	93455
Rita Ringer	90706
Mark Trotter	93455
Michael Torres	90631
Robert Zika	92882
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Michael Craven	92010
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west reese	92150
David Bennett	91910
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Kyle Yearsley	90808
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Jesse Link	90717
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Giovanni Estrada	90805
Bobby Mcdonald	93455

Name	Zip code
owen abbott	93012
Eric Simpson	92870
Ethan Link	90717
Sean MacNeil	92626
Luis Flores	91761
Don Salveson	91364
Alexis meza	90810
Harry Markarian	91364
Justin Arnold	93023
John Tashdjian	91423

January 25, 2025

California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090
fgc@fgc.ca.gov

Dear Members of the Fish and Game Commission,

Subject: Recreational Take of Barred Sand Bass

I am writing to express my deep concern regarding the proposed amendment to alter the regulations on the recreational take of barred sand bass. This proposal lacks scientific research and data. As a dedicated advocate for the preservation of our natural ecosystems, I believe that this proposal will have deleterious effects on both our environment and the community of anglers who rely on this species for sustenance and recreation. The long-term implications may inadvertently cause irreversible damage to our marine environment.

It is imperative to consider the long-term implications of this proposed amendment. Sustainable fishing practices are essential to ensure that future generations can continue to enjoy the bounty of our natural resources. By prioritizing immediate gains over the preservation of barred sand bass populations, we may inadvertently cause irreversible damage to our marine environment.

I urge the commission to reconsider this proposed amendment and to consider the potential negative impacts.

Thank you for your attention to this critical matter. I trust that the commission will make a decision that prioritizes the health of our marine ecosystems and supports the sustainable practices that benefit both the environment and the angling community.

Sincerely,

1/26/25

Dear Members of the California Fish and Game Commission,

I am writing to express my deep concerns regarding the potential establishment of a no-take season for barred sand bass fishing from June 1 to August 31, as reflected in the proposed amendment to Section 28.30, item 23 on the agenda for the February 13, 2025, meeting of the California Fish and Game Commission meeting. After reviewing the information available, I believe the decision lacks sufficient scientific basis and fails to consider the broader ecological, social, and economic implications. I respectfully urge the Commission to avoid a no-take season for barred sand bass based on the following points:

1. Catch Rates Are Not Indicative of Species Decline: Catch rates alone should not be used as a definitive indicator of population health. Many anglers and sport fishing operators have shifted their focus to other species, such as bluefin tuna, which have become increasingly abundant during much of the fishing season. This shift in effort has likely contributed to the perceived decline in barred sand bass catches and does not necessarily reflect an actual reduction in the population.

2. Lack of Recent Stock Assessments: There has been no recent comprehensive stock assessment of barred sand bass to determine the current state of the population. Without updated and rigorous scientific data, any regulatory action risks being based on outdated or incomplete information. A thorough stock assessment should be conducted before imposing a zero-take season for barred sand bass.

3. Failure to Acknowledge Migratory Behavior: Reports from the California Department of Fish and Wildlife (CDFW) do not adequately reflect the migratory nature of barred sand bass. These fish are known to move between habitats and regions, making localized data potentially misleading. A broader and more nuanced understanding of their migratory patterns is essential for informed management decisions, especially as drastic as the creation of a zero-take season.

4. Disproportionate Impact on Disadvantaged Anglers: A no-take season for barred sand bass would disproportionately affect disadvantaged and underprivileged anglers, as well as tribal communities, who rely on nearshore species for accessible and affordable recreational fishing opportunities. barred sand bass is a key species for these communities, offering a vital connection to the outdoors, providing a subsistence food source, and fostering a love for fishing that transcends economic barriers.

5. Barred Sand Bass is a Gateway Fish: Barred sand bass play a crucial role as a gateway species for young and novice anglers in the saltwater recreational fishing community. These easy-to-catch fish offer an accessible and rewarding experience that fosters a lifelong appreciation for marine ecosystems and a love for the ocean. Eliminating access to this species with a no-take season could diminish participation in the sport and future sales of fishing licenses, particularly among younger generations, impairing success of the 3Rs program (Recruit, Retain and Reactivate).

6. Economic Contributions of Sport Fishing: The recreational fishing industry is a significant contributor to California's economy, generating billions of dollars annually and supporting thousands of jobs. A no-take season for barred sand bass could have a cascading negative impact on the sport-fishing sector, including tackle shops, charter boats, and tourism-dependent businesses. It is crucial to weigh the economic consequences of this potential closure against its purported ecological benefits.

In conclusion, I urge the California Fish and Game Commission to prioritize updated scientific research and stakeholder input before establishing a no-take for barred sand bass. Collaborative efforts between the Department of Fish and Wildlife and stakeholders such as anglers, charter captains, scientists and eNGOs can lead to more balanced and effective conservation solutions that protect marine resources while preserving access and opportunities for California's diverse fishing community. Thank you for considering my comments. I appreciate the Commission's dedication to sustainable fisheries management.

Sincerely,

James M Troltzsmann

Dear Members of the California Fish and Game Commission,

1/24/25

I am writing to express my deep concerns regarding the potential establishment of a no-take season for barred sand bass fishing from June 1 to August 31, as reflected in the proposed amendment to Section 28.30, item 23 on the agenda for the February 13, 2025, meeting of the California Fish and Game Commission meeting. After reviewing the information available, I believe the decision lacks sufficient scientific basis and fails to consider the broader ecological, social, and economic implications. I respectfully urge the Commission to avoid a no-take season for barred sand bass based on the following points:

1. Catch Rates Are Not Indicative of Species Decline: Catch rates alone should not be used as a definitive indicator of population health. Many anglers and sport fishing operators have shifted their focus to other species, such as bluefin tuna, which have become increasingly abundant during much of the fishing season. This shift in effort has likely contributed to the perceived decline in barred sand bass catches and does not necessarily reflect an actual reduction in the population.

2. Lack of Recent Stock Assessments: There has been no recent comprehensive stock assessment of barred sand bass to determine the current state of the population. Without updated and rigorous scientific data, any regulatory action risks being based on outdated or incomplete information. A thorough stock assessment should be conducted before imposing a zero-take season for barred sand bass.

3. Failure to Acknowledge Migratory Behavior: Reports from the California Department of Fish and Wildlife (CDFW) do not adequately reflect the migratory nature of barred sand bass. These fish are known to move between habitats and regions, making localized data potentially misleading. A broader and more nuanced understanding of their migratory patterns is essential for informed management decisions, especially as drastic as the creation of a zero-take season.

4. Disproportionate Impact on Disadvantaged Anglers: A no-take season for barred sand bass would disproportionately affect disadvantaged and underprivileged anglers, as well as tribal communities, who rely on nearshore species for accessible and affordable recreational fishing opportunities. barred sand bass is a key species for these communities, offering a vital connection to the outdoors, providing a subsistence food source, and fostering a love for fishing that transcends economic barriers.

5. Barred Sand Bass is a Gateway Fish: Barred sand bass play a crucial role as a gateway species for young and novice anglers in the saltwater recreational fishing community. These easy-to-catch fish offer an accessible and rewarding experience that fosters a lifelong appreciation for marine ecosystems and a love for the ocean. Eliminating access to this species with a no-take season could diminish participation in the sport and future sales of fishing licenses, particularly among younger generations, impairing success of the 3Rs program (Recruit, Retain and Reactivate).

6. Economic Contributions of Sport Fishing: The recreational fishing industry is a significant contributor to California's economy, generating billions of dollars annually and supporting thousands of jobs. A no-take season for barred sand bass could have a cascading negative impact on the sport-fishing sector, including tackle shops, charter boats, and tourism-dependent businesses. It is crucial to weigh the economic consequences of this potential closure against its purported ecological benefits.

In conclusion, I urge the California Fish and Game Commission to prioritize updated scientific research and stakeholder input before establishing a no-take for barred sand bass. Collaborative efforts between the Department of Fish and Wildlife and stakeholders such as anglers, charter captains, scientists and eNGOs can lead to more balanced and effective conservation solutions that protect marine resources while preserving access and opportunities for California's diverse fishing community. Thank you for considering my comments. I appreciate the Commission's dedication to sustainable fisheries management.

Sincerely,

Jan 26, 2025

Dear Members of the California Fish and Game Commission,

I am writing to express my deep concerns regarding the potential establishment of a no-take season for barred sand bass fishing from June 1 to August 31, as reflected in the proposed amendment to Section 28.30, item 23 on the agenda for the February 13, 2025, meeting of the California Fish and Game Commission meeting. After reviewing the information available, I believe the decision lacks sufficient scientific basis and fails to consider the broader ecological, social, and economic implications. I respectfully urge the Commission to avoid a no-take season for barred sand bass based on the following points:

1. Catch Rates Are Not Indicative of Species Decline: Catch rates alone should not be used as a definitive indicator of population health. Many anglers and sport fishing operators have shifted their focus to other species, such as bluefin tuna, which have become increasingly abundant during much of the fishing season. This shift in effort has likely contributed to the perceived decline in barred sand bass catches and does not necessarily reflect an actual reduction in the population.

2. Lack of Recent Stock Assessments: There has been no recent comprehensive stock assessment of barred sand bass to determine the current state of the population. Without updated and rigorous scientific data, any regulatory action risks being based on outdated or incomplete information. A thorough stock assessment should be conducted before imposing a zero-take season for barred sand bass.

3. Failure to Acknowledge Migratory Behavior: Reports from the California Department of Fish and Wildlife (CDFW) do not adequately reflect the migratory nature of barred sand bass. These fish are known to move between habitats and regions, making localized data potentially misleading. A broader and more nuanced understanding of their migratory patterns is essential for informed management decisions, especially as drastic as the creation of a zero-take season.

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Sincerely,

April 3, 2025

California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090

Submitted via email to fgc@fgc.ca.gov

RE: Item 23. Recreational take of barred sand bass

Dear President Zavaleta and Honorable Commissioners:

On behalf of our recreational fishing community, Fish On would like to express our concerns about the health and status of the barred sand bass fishery in Southern California. As you know, we are a leading voice in ocean justice and equitable access issues for subsistence and recreational fishing communities in California and across the United States. We are founded, run and informed by anglers and spearfishers who financially support our efforts at a grassroots level, in addition to small grants which we solicit. Earth Island Institute acts as our fiscal sponsor, where they receive a small percentage of the funds we raise to provide organizational support and so we can more efficiently share capacities among other small organizations under their umbrella. To support Fish On's community who are regularly un- or under-represented in fishery management, we hope you will implement a meaningful regulation change for our beloved barred sand bass fishery. **We want to rebuild this fishery so it is viable and sustainable for generations to come; a seasonal closure and bag limit reduction is critically necessary and supported by data, science and our recreational fishing community.**

Fishery management is a data-limited practice and near-shore species tend to be the most data-limited, further marginalizing and risking the health of shore-based and subsistence angling communities. For barred sand bass however, there is a considerable amount of sound, credible data, study and science—and lessons learned from the last regulatory change—pointing to the critical necessity of a seasonal closure to ensure a future for barred sand bass. Failure to do so will not only ignore an opportunity to support everyday anglers but would also set a dangerous precedent of ignoring the California Department of Fish and Wildlife's own science in favor of commercial interests.

There are multiple data sources—catch rates, tagging data, larval data, hydroacoustic data, subtidal surveys, recruitment data and environmental data—that confirm the critical state of the barred sand bass population and show that the current recruitment pulse, alarmingly, has no additional pulses

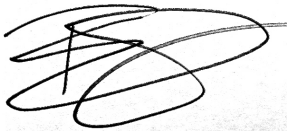
behind it.[1] Our own experiences on the water, plus well-documented and credible reports, corroborate the existence of spawning aggregations and that they are heavily targeted.[2] No fishery can be sustainably fished when spawning aggregations are easily targeted and aren't protected. We must take action to protect the current spawning stock or we will likely face another fishing-induced collapse.

Fish On supports the original recommendation for a June - August seasonal closure to protect spawning aggregations of barred sand bass, and a two fish bag limit the remaining months of the year; noting our input was not considered in the working group discussions that amended this originally proposed regulation change. When barred sand bass regulations are revisited in 2028 and if there is evidence of recovery and recruitment, many members of our community have expressed support for slot limits in addition to appropriate bag limits to enhance barred sand bass fishing and conservation. We hope CDFW will take this into account with ongoing research and monitoring and, if feasible and scientifically-sound, consider how slot limits could support a sustainable sand bass fishery in future regulatory change recommendations.

There is no normal anymore—with climate change, management of marine fisheries will carry more risk. We must take a more precautionary approach to fishery management or the environment will set limits for us. Waiting for science to conclusively prove the need for conservation is not only inconsistent with the Marine Life Management Act[3] but may put us on a path from which we cannot ever recover a fishery. As fishers and stewards of the ocean, we are committed to reducing our impact and allowing species to recover when needed.

We can easily adapt to a seasonal closure. We cannot undo the loss of another fishery.

Respectfully,



Anupa Asokan
Founder and Executive Director
Fish On

Brenton Spies, PhD
Research Scientist and Fisherman
CSU, Channel Islands

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[1] Allen, L.G., Won, C., Bolser, D.G. and Erisman, B.E., 2020. Feasibility of hydroacoustic surveys of spawning aggregations for monitoring Barred Sand Bass populations off southern California. Calif Fish Wildl, 106, pp.139-155.; Davis, J.P., Valle, C.F., Haggerty, M.B. and Gliniak, H.L., 2019. Comparing video and visual survey techniques for Barred Sand Bass in rocky reef ecotone habitats. California Fish and Game, 105(4), pp.233-253.; Mason, E.T.J., Riecke, T.V., Bellquist, L.F., Pondella II, D.J. and Semmens, B.X., 2024. Recruitment limitation increases susceptibility to fishing-induced collapse in a spawning aggregation fishery. Marine Ecology Progress Series, 738, pp.203-224.

[2] Allen, L.G., 2010. The impact of intense recreational fishing pressure on spawning aggregations of barred sand bass (Paralabrax nebulifer) off the Los Angeles Metropolitan Area.; Jarvis, E.T., Linardich, C. and Valle, C.F., 2010. Spawning-related movements of barred sand bass, Paralabrax nebulifer, in southern California: interpretations from two decades of historical tag and recapture data. Bulletin, Southern California Academy of Sciences, 109(3), pp.123-143.

[3] CDFW Marine Life Management Act Summary: https://wildlife.ca.gov/Conservation/Marine/MLMA

Outlook

Two Letters for FGC April 16-17 Meeting

From Katie O'Donnell [redacted]
Date Thu 04/03/2025 02:46 PM
To FGC <FGC@fgc.ca.gov>
Cc Zoe Collins <[redacted]

Hello,

I hope this email finds you well!

Please see the attached two comment letters from NGOs related to agenda items for the upcoming FGC meeting on April 16-17. One is a letter about FGC public comment and the other is about barred sand bass management.

As always, please feel free to reach out if you have any questions or would like to discuss in more detail. We appreciate your work and consideration of these comments!

Thank you,
Katie

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Katie O'Donnell
US Ocean Conservation Manager
she/her/hers

April 3, 2025

California Fish and Game Commission
Marine Resources Committee
P.O. Box 944209
Sacramento, CA 94244-2090

Submitted electronically to fgc@fgc.ca.gov

RE: Item 23. Recreational take of barred sand bass

Dear President Zavaleta and Honorable Commissioners:

Following discussion at the February 13, 2025 California Fish and Game Commission (FGC) meeting on the consideration of amendments to the recreational barred sand bass fishery, our organizations are deeply concerned about the devaluation of science in guiding management decisions. Such a way of governing a public trust resource is inconsistent with the FGC Mission Statement and the Marine Life Management Act (MLMA).

Over the past several months, the proposed changes in recreational take for the barred sand bass fishery changed from the original California Department of Fish and Wildlife (CDFW) recommendation of a maximum of two fish from September - May and a seasonal closure from June - August to a symbolic gesture that will have little positive impact on the resource. Anecdotal accounts can be valuable, but cannot replace science assessments across time and geography. Not applying and utilizing CDFW's own research data and that of the scientific experts on the barred sand bass working group will set a dangerous precedent—barred sand bass management should not reject the CDFW's data and the best available science. We recognize the

amount of work that the Department spends on its data collection and recommendations, and request that scientific expertise be given weight.

The presumption that disposing of a precautionary approach in the short term will be better for the resource in the long term is not supported by science. A method of decision making in which the desire to maintain social capital and trust with a portion of the fishing fleet overrides the conservation benefits to a depleted fishery and prioritizes the interests of one extractive stakeholder group over the resource itself, the interests of other recreational fishers (including future generations), and California's millions of non-consumptive ocean users is unjust. There is a risk that ignoring science now will compromise the Commission's ability to sustainably manage future fisheries resources by eroding public trust in the management process.

Fishery management is inherently data-limited. Historically, California has been a global leader in marine resource management by applying credible scientific data to inform decision-making. The MLMA requires that marine living resources "...be managed sustainably and on the basis of the best available scientific information".[1] Rather than assuming that exploitation should continue until damage is statistically detectable, the MLMA shifts the burden of proof toward demonstrating that fisheries and other activities *are* sustainable.[2] Given the substantial information on barred sand bass provided by CDFW and through external scientific experts, we encourage you to take a scientific approach to rebuilding the barred sand bass population. Doing otherwise risks sacrificing long-term health for short-term gains, and acting against the MLMA's underlying goal of sustainable management.[3]

The MLMA states that marine life need not be consumed to provide important benefits to people, including aesthetic and recreational enjoyment as well as scientific study and education.[4] It is important to consider the long-term health of this species for all coastal communities, and the opportunity for this fishery to benefit all types of anglers into the future – not just those speaking for commercial interests.

Sincerely,

Katie O'Donnell
US Ocean Conservation Manager
WILDCOAST

Ashley Eagle-Gibbs

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[1] MLMA, FGC Code Section 7050 b(6)
[2] California Department of Fish & Wildlife, Marine Life Management Act Summary, https://wildlife.ca.gov/Conservation/Marine/MLMA
[3] MLMA , FGC Code Section 7050 b(2)
[4] MLMA, FGC Code Section 7050 b(3)

Executive Director
Environmental Action Committee of West Marin

Sandy Aylesworth
Director, Pacific Initiative
Natural Resources Defense Council

Rikki Eriksen, Ph.D.
Marine Scientist
California Marine Sanctuary Foundation

Tomas Valadez
CA Policy Manager
Azul

Laura Deehan
State Director
Environment California Research and Policy Center

Zoë Collins
Marine Protected Area Program Coordinator
Heal the Bay