



Re: Draft California Artificial Reef Program Plan

Dear California Department of Fish and Wildlife:

The American Sportfishing Association appreciates the opportunity to comment on the Draft California Artificial Reef Program Plan and strongly supports CDFW's effort to reestablish an active statewide artificial reef program.

ASA's primary recommendation is that CDFW move the Draft Plan from planning to implementation. The final Plan should retain recreational fishing as a core purpose of CARP, identify a first demonstration reef designed to increase fish production and fishing opportunity, establish a realistic path for staffing and funding, and engage the recreational fishing community early in project siting and development. California has been without an active artificial reef program for more than two decades, and ASA believes the science and experience now exist to begin building successful new reefs.

CARP was created in 1985 in response to declines in marine fish populations affecting sport and commercial fishing. The program was intended to use artificial reefs to increase fish and invertebrate production, and CDFW's 1990 Artificial Reef Plan specifically identified increasing sportfish abundance and improving sportfishing as program purposes.

ASA also appreciates that CDFW has looked beyond California and incorporated lessons from other states and countries where artificial reef science and management have advanced significantly. The Draft draws from Florida's artificial reef guidance and current research on reef design, placement, habitat complexity and fish production.

Many coastal states have invested heavily in artificial reef programs and realized meaningful biological, social and economic benefits. The Draft notes that 17 states now have formal artificial reef programs. Florida provides a strong example, where artificial reefs are estimated to support more than 39,000 jobs and generate approximately \$3.1 billion in economic output.

The science has also advanced considerably since CARP was established. Properly designed and located artificial reefs can do more than simply attract fish. They can support recruitment, growth, reproduction and increased biomass. California projects such as Torrey Pines and Palos Verdes demonstrate that well designed reefs can provide measurable biological production.

Strategically constructing artificial reefs based on the best available science is consistent with California's broader conservation goals. Done correctly, artificial reefs can increase biological

productivity, support native biodiversity, restore habitat and provide recreational fishing opportunities at the same time.

Artificial reefs may also help address some of the recreational fishing access lost through California's MPA network. Approximately 16 percent of California coastal state waters are now within MPAs, with about 9.6 percent managed as no take and additional areas allowing only limited take. Many of these areas include productive rocky reef habitat important to recreational fisheries.

ASA believes CDFW should consider strategically locating new artificial reefs near affected coastal communities, where biologically and legally appropriate, to create additional productive habitat and fishing opportunity. The Draft already recognizes proximity to MPAs as an important consideration and notes the potential for artificial reefs to improve habitat connectivity and provide fish to adjacent harvest areas.

ASA recommends that CDFW:

1. **Keep recreational fishing as a core purpose of CARP.** The final Plan should clearly reflect the program's history and original purpose of increasing sportfish abundance and improving recreational fishing.
2. **Move from planning to implementation.** Establish a clear path to restart CARP, including staffing, funding, priority areas and a realistic timeline for constructing new reefs.
3. **Begin with a demonstration project.** Identify at least one new reef designed specifically to increase fish production and improve recreational fishing opportunity.
4. **Use what has worked elsewhere.** Continue drawing from successful artificial reef programs in Florida and other states and countries.
5. **Use the best available science without making monitoring a barrier to action.** ASA supports meaningful monitoring, but requiring studies to conclusively separate attraction from increased production should not prevent well designed projects from moving forward. Existing research provides a strong basis for reef design, siting, monitoring and adaptive management.
6. **Consider lost fishing opportunity.** Where appropriate, new reefs should be considered near communities that have lost access to productive rocky reef fishing grounds through MPA designations.
7. **Work closely with the recreational fishing community.** Anglers, charter operators, fishing businesses and other stakeholders should be involved early in selecting locations and establishing project objectives.

CARP has been largely inactive for more than two decades. The Draft Plan provides an opportunity to change that and once again use artificial reefs to increase fish production, improve habitat, expand recreational fishing opportunities and provide economic benefits to California's coastal communities.

ASA looks forward to working with CDFW, the California Legislature and other partners to build strong recreational fishing industry support for the program and help secure the funding necessary to reinitiate CARP and begin constructing successful new artificial reefs.

Thank you for considering our comments.

Sincerely,

Larry Phillips

Pacific Fisheries Policy Director
American Sportfishing Association