



October 31, 2011

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

Dear Commissioners:

On behalf of California's recreational fishing industry, the American Sportfishing Association (ASA) expresses its strong opposition to the CA Department of Fish and Game's (DFG) proposed fish stocking regulations.

ASA is the nation's recreational fishing industry trade association, representing sportfishing manufacturers, distributors, retailers, media and angler advocacy groups, as well as the interests of America's 30 million recreational anglers, with over 1.7 million Californians pursuing the sport in freshwater. ASA safeguards and promotes the social, economic and conservation values of sportfishing in America. Freshwater recreational fishing in California results in an almost \$2.4 billion-a-year impact on the state's economy, producing over \$168 million in state and local taxes and supporting nearly 20,000 jobs.

Fee for fishing lakes are a popular means for anglers to enjoy the sport and share it with their family and friends. These lakes are especially important to anglers living in urban areas that may not have access to quality streams and lakes for fishing. If enacted, the DFG's proposed fish stocking regulations will place a significant financial and regulatory burden on these private lakes and other recreational fishing-dependent businesses. Some of the regulations under consideration have exorbitant fees associated with them and will force many private lakes out of business. These regulations will ultimately serve to reduce recreational fishing opportunity within the state of California and the economic benefits that come with it. This is something that California can ill afford at this time of record unemployment.

The DFG's inclusion of private hatcheries and fishing stocking operations in its environmental impact report (EIR) for the state's hatcheries not only extends beyond the scope of the court order from the 2006 Center for Biological Diversity lawsuit, but beyond the department's jurisdiction as well. Under the guise of the EIR, the DFG has created a series of regulatory requirements that will impose severe measures on businesses across the state. Private ponds have long been exempted from the state's fish stocking permit requirements and have operated fish hatcheries and stocking ponds for over 100 years. In addition, the DFG has proposed annual disease certification requirements and quarterly invasive species testing for every private hatchery and fish farm. For those private lakes that are not put out of business by the fees associated with these rigorous protocols, they will be forced to significantly increase the cost for the visiting angler.

AMERICAN SPORTFISHING ASSOCIATION

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Through experience and a number of surveys and studies, the sportfishing industry knows that anglers are very price sensitive to the cost of fishing equipment and licenses. The increase in the cost of fishing that is associated with these regulations is further amplified by the DFG's proposal that will require all anglers to purchase a fishing license to catch fish on privately stocked lakes and ponds. Substantial price increases will drive anglers away from the sport and the impact will be decreased fishing license sales to state natural resource agencies and less money for fisheries conservation. In 2011, California sold over \$62 million in fishing licenses, tags and permits and received over \$18 million in sport fish restoration funds. In this tight fiscal environment, this is not money that the DFG can afford to lose as a result of unwarranted and burdensome regulations.

If approved, the net result of these proposed regulations will be closed business, lost jobs, decreased fishing opportunity and a drop in fishing license sales. ASA urges you to oppose these regulations, which will hurt California's sportfishing community and the state's economy.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Gordon C. Robertson". The signature is written in a cursive, flowing style.

Gordon Robertson
Vice President

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