Comments from CDFW on Artificial Reefs – to be appended to August 2016 minutes after Dawn Hayes’ presentation:

- It is still unclear how artificial reefs work as a fisheries management tool and they are not being used in most states as a management tool. They are being used as a fishing opportunity tool.
- Stakeholders are the primary driver of artificial reefs in all states, even those that have a strong permitting process.
- The “California Department of Fish and Game Nearshore Sport Fish Habitat Enhancement Program Artificial Reef Plan for Sport Fish Enhancement” is old and in need of refinement.
- The following is incorrect: “The State’s current focus is on MPAs, so staff who might normally address this plan have been reassigned.”
  - While there is a focus on MPAs, it is not the only thing the Department is focused on. It is incorrect that the same staff who work on MPAs would be working on artificial reefs. The Artificial Reef program is an unfunded mandate and has been for some time.
- The permitting agencies could permit an artificial reef but the Department is not currently supporting the creation of artificial reefs until a scientifically based statewide plan is developed for the placement of artificial reefs in State waters. The Fish and Game Code does reference the potential need for artificial reefs to potentially help offset the impact on the sport and commercial fishing industry from declining fish stocks (FGC 6420(a)).
  - In addition, the interest and reasons for artificial reefs have increased over time. They are wanted as mitigation for development projects, as mitigation to offset MPA impacts to fishing, for use as protection against climate change, and for enhancement of fishing opportunities closer to shore. The current Code and Plan do not address these issues.
- The following is incorrect, because both the Plan and Code need to be looked at together:
  - This precludes permitting the sinking of a ship/aircraft/rail car for artificial reefs purposes (fishing or recreational). The plan is focused on habitat restoration, mitigation and stock enhancement and does not consider recreational use.
- The State needs to have a better idea of how the existing artificial reefs are functioning and a comparison needs to be made between the productivity of a natural reef versus that of an artificial reef.
- The following should be removed: CDFW is looking to have a white paper out this winter on future implementation of artificial reefs
  - This was only one option. We are looking for ways to fund the development of the statewide plan for placement of artificial reefs. We are teaming up with interest groups and agencies to work on the issue in the coming months.