

STAFF SUMMARY FOR FEBRUARY 6, 2019

5. GENERAL PUBLIC COMMENT**Today's Item****Information** ☒**Action** ☐

Receive public comments, petitions for regulation change, and requests for non-regulatory actions for items not on the agenda.

Summary of Previous/Future Actions

- **Today's receipt of requests and comments** **Feb 6, 2019; Sacramento**
- Consider granting, denying or referring **Apr 17-18, 2019; Santa Monica**

Background

This agenda item is primarily to provide the public an opportunity to address FGC on topics not on the agenda. Staff also includes written materials and comments received prior to the meeting as exhibits in the meeting binder (if received by written comment deadline), or as late comments at the meeting (if received by late comment deadline), for official FGC "receipt."

Public comments are generally categorized into three types under general public comment: (1) petitions for regulation change; (2) requests for non-regulatory action; and (3) informational-only comments. Under the Bagley-Keene Open Meeting Act, FGC cannot discuss any matter not included on the agenda, other than to schedule issues raised by the public for consideration at future meetings. Thus, petitions for regulation change and non-regulatory requests generally follow a two-meeting cycle (receipt and direction); FGC will determine the outcome of the petitions for regulation change and non-regulatory requests received at today's meeting at the next in-person FGC meeting following staff evaluation.

As required by the Administrative Procedure Act, petitions for regulation change will be either denied or granted and notice made of that determination. Action on petitions received at previous meetings is scheduled under a separate agenda item titled "Petitions for regulation change." Action on non-regulatory requests received at previous meetings is scheduled under a separate agenda item titled "Non-regulatory requests."

Significant Public Comments

1. New petitions for regulation change are summarized in Exhibit 1, and the original petitions are provided as exhibits 3-5.
2. Requests for non-regulatory action are summarized in Exhibit 2, and the original requests are provided as exhibits 6-8.
3. Informational comments are provided as exhibits 9-11.

Recommendation

Consider whether any new future agenda items are needed to address issues that are raised during public comment and are within FGC's authority.

STAFF SUMMARY FOR FEBRUARY 6, 2019

Exhibits

1. [Summary of new petitions for regulation change received by Jan 24, 2019 at 5:00 p.m.](#)
2. [Summary of requests for non-regulatory action received by Jan 24, 2019 at 5:00 p.m.](#)
3. [Petition #2018-019: Recreational shrimp mesh size, received Dec 18, 2018](#)
4. [Petition #2019-001: Ballona Wetlands, received Jan 7, 2019](#)
5. [Petition #2019-002: Nearshore permits, received Jan 24, 2019](#)
6. [Email from Sydney Harvey requesting a ban on bow hunting of black bears in California, received Dec 18, 2018](#)
7. [Letter from Gary Kirkland requesting the Commission to lobby the Legislature and Congress to survey the ocean and sell the ocean in divided lots to the highest bidders to avoid the tragedy of the commons problem, received Jan 15, 2019](#)
8. [Email from Chi Ma requesting the creation of a free study guide for the DFW falconry exam, received Jan 23, 2019](#)
9. [Email from David Willett, representing Santa Barbara Sea Ranch, Inc. \(SBSR\), providing an addendum to SBSR's application for lease of state water bottoms for aquaculture, received Dec 1, 2018](#)
10. [Email from Rob Ricci regarding the Mad River fish hatchery, received Jan 8, 2019](#)
11. [Email from Jim Lambert regarding striped bass in the Carmel River, received Jan 15, 2019](#)

Motion/Direction (N/A)

CALIFORNIA FISH AND GAME COMMISSION
RECEIPT LIST FOR REGULATION CHANGE REQUESTS: RECEIVED BY 5:00 PM ON JANUARY 24, 2019
Revised 1-28-2019

FGC - California Fish and Game Commission **DFW** - California Department of Fish and Wildlife **WRC** - Wildlife Resources Committee **MRC** - Marine Resources Committee

Tracking No.	Date Received	Accept or Reject	Name of Petitioner	Subject of Request	Code or Title 14 Section Number	Short Description	FGC Decision
2018-019	12/18/2018	A	Don Greeno	Recreational shrimp mesh size	29.8, T14	Increase minimum trap opening size for recreational shrimp south of Point Conception from current ½" to a size between 1 ½" and 3", to reduce proportion of juvenile shrimp in catch and to increase parity with size restrictions north of Point Conception.	Receipt: 2/6/2019 Action scheduled: 4/17-18/2019
2019-001	1/7/2019	A	Walter Lamb	Ballona Wetlands	630, T14	Eliminate commercial parking use in the Ballona Wetlands Ecological Reserve.	Receipt: 2/6/2019 Action scheduled: 4/17-18/2019
2019-002	1/24/2019		Brian Gorrell	Nearshore Permits	F&G Code 713, 1050 and 8587.1	Add additional "trap endorsement" opportunities to nearshore permit holders who purchased two nearshore permits to create one nearshore permit, in compliance with the limited entry permit reduction process that ended last year.	Receipt: 2/6/2019 Action scheduled: 4/17-18/2019

CALIFORNIA FISH AND GAME COMMISSION
RECEIPT LIST FOR NON-REGULATORY ACTION: RECEIVED BY 5:00 PM ON JANUARY 24, 2019
Revised 1-28-19

FGC - California Fish and Game Commission **DFW** - California Department of Fish and Wildlife **WRC** - Wildlife Resources Committee **MRC** - Marine Resources Committee

Date Received	Name of Petitioner	Subject of Request	Short Description	FGC Decision
12/18/2018	Sydney Harvey	Bow hunting of black bears	Request for a ban on bow hunting of black bears in California.	Receipt: 2/6/2019 Action scheduled: 4/17-18/2019
1/15/2019	Gary Kirkland	Sell the ocean in divided lots	Request for FGC to lobby the Legislature and Congress to survey the ocean and sell the ocean in divided lots to the highest bidders.	Receipt: 2/6/2019 Action scheduled: 4/17-18/2019
1/23/2019	Chi Ma	Free study guide for falconry exam	Request to create a free study guide for the DFW falconry exam.	Receipt: 2/6/2019 Action scheduled: 4/17-18/2019



Tracking Number: (2018-019)

To request a change to regulations under the authority of the California Fish and Game Commission (Commission), you are required to submit this completed form to: California Fish and Game Commission, 1416 Ninth Street, Suite 1320, Sacramento, CA 95814 or via email to FGC@fgc.ca.gov. Note: This form is not intended for listing petitions for threatened or endangered species (see Section 670.1 of Title 14).

Incomplete forms will not be accepted. A petition is incomplete if it is not submitted on this form or fails to contain necessary information in each of the required categories listed on this form (Section I). A petition will be rejected if it does not pertain to issues under the Commission's authority. A petition may be denied if any petition requesting a functionally equivalent regulation change was considered within the previous 12 months and no information or data is being submitted beyond what was previously submitted. If you need help with this form, please contact Commission staff at (916) 653-4899 or FGC@fgc.ca.gov.

SECTION I: Required Information.

Please be succinct. Responses for Section I should not exceed five pages

1. Person or organization requesting the change (Required)

Name of primary contact person: Don Greeno

Address:

Telephone number:

Email address:

2. Rulemaking Authority (Required) - Reference to the statutory or constitutional authority of the Commission to take the action requested: Coonstripe shrimp authorities cited are sections 200,205,265 and 270, Fish and Game Code.

3. Overview (Required) - Summarize the proposed changes to regulations: proposed changed in recreational Shrimp fishing South of Point Conception Trap opening size of ½” to a size appropriate to catch the species as ½” is too small 1 ½ - 3” would be an appropriate size range ½” current regulation will only catch Juvenile Shrimp less than 1 year old and Juvenile Bycatch..

4. Rationale (Required) - Describe the problem and the reason for the proposed change: Current Traps opening size of ½” will not catch Average Sized Shrimp of 2.5”-3.5” as the small size only allows catch of Juvenile Shrimp and Juvenile Bycatch. the current regulation ether has a typo or other problem as a ½” tramp opening size is not manufactured, recognized or used anywhere in the recreational or commercial shrimp industry or the entire world for any species by any fisherman. A trap must have an opening of one size the shrimp enters the trap/pot and once inside the trap the exterior MESH must be of a smaller size to keep the shrimp inside the trap/pot. With a ½’ opening the smaller exterior MESH would need to be of ¼” MESH size to retain the catch. The ½” opening size will only allow Juvenile shrimp to enter the trap and nothing larger than ¼’ can escape as Bycatch. Catching any species that small is not good and this regulation must be amended.

SECTION II: Optional Information



5. Date of Petition: 12/18/2018

6. Category of Proposed Change

- ☒ Sport Fishing
- ☐ Commercial Fishing
- ☐ Hunting
- ☐ Other, please specify:

7. The proposal is to: (*To determine section number(s), see current year regulation booklet or <https://govt.westlaw.com/calregs>*)

- ☒ Amend Title 14 Section(s):CCR T-14 29.80
- ☐ Add New Title 14 Section(s):
- ☐ Repeal Title 14 Section(s):

8. If the proposal is related to a previously submitted petition that was rejected, specify the tracking number of the previously submitted petition

Or ☒ Not applicable.

9. Effective date: If applicable, identify the desired effective date of the regulation.
If the proposed change requires immediate implementation, explain the nature of the emergency:

10. Supporting documentation: Identify and attach to the petition any information supporting the proposal including data, reports and other documents: PDF DFG Status of Fishery report on Coonstripe Shrimp *Pandalus danae*, photos of traps used to identify the trap opening size and Exterior Mesh of a shrimp trap/pot, Publics negative comments from Web forums about this regulation and a detailed overview of the problem and needed amending.

11. Economic or Fiscal Impacts: Identify any known impacts of the proposed regulation change on revenues to the California Department of Fish and Wildlife, individuals, businesses, jobs, other state agencies, local agencies, schools, or housing:

12. Forms: If applicable, list any forms to be created, amended or repealed:

SECTION 3: FGC Staff Only

Date received:

FGC staff action:

- ☐ Accept - complete
- ☐ Reject - incomplete
- ☐ Reject - outside scope of FGC authority

RECEIVED
CALIFORNIA
FISH AND GAME
COMMISSION

2018 DEC 18 PM 12:24

Tracking Number

Date petitioner was notified of receipt of petition and pending action: _____

Meeting date for FGC consideration: _____



State of California – Fish and Game Commission

PETITION TO THE CALIFORNIA FISH AND GAME COMMISSION FOR REGULATION CHANGE

FGC 1 (NEW 10/23/14) Page 3 of 3

FGC action:

- ☐ Denied by FGC
- ☐ Denied - same as petition _____
Tracking Number
- ☐ Granted for consideration of regulation change

Subject: Recreational Coonstripe Shrimp Fishing South of Point Conception

Dear Melissa Miller-Henson and the Fish and Game Commission,

My Name is Don Greeno and I am a recreational Fisherman from Southern California South of Point Conception in the Region 5 area.

Over the years I have looked into fishing for shrimp locally and most recently had the urge again to pursue the regulations to fish for shrimp. When I read the current regulation it was very unclear as I will explain in a moment but, it was the same written regulation I have read for many years. I believe over 20 years if I am correct in my memory.

CCR T-14 29.80(f) Shrimp and prawn traps may be used to take shrimp and prawns only. Trap openings may not exceed ½ inch in any dimension on traps used south of Point Conception nor five inches in any dimension on traps used north of Point Conception.

CCR T-14 29.08(a) Except as provided in this article there are no closed seasons, closed hours or minimum size limits for any invertebrate. The bag limit on all invertebrates for which the take is authorized and for which there is not a bag limit otherwise established in this article is 35.

I looked into purchasing some traps and found that Shrimp Traps/Pots come in a few wire size configurations of ½" and 7/8" MESH. While reading the above regulation on the recreational take of Coonstripe Shrimp South of Pont Conception, it refers to the **TRAP OPENING BEING ½"** IN ANY DIRECTION. However, the trap manufactures **do not in any instance** mention the trap opening sizes. This is the way it is with all the manufactures of Shrimp Traps/Pots that supply the Commercial AND Recreational fishery here and across the United States and Canada. I did a very extensive search via the internet. Information was easy to find.

So with traps having ½" MESH and no mention of opening sizes I wanted to ask the Warden and get some clarification if the regulation is speaking of ½" MESH or OPENING? Now I was confused.

I emailed Region 5 on the "Ask a Warden" email address I found easily online.

I was provided 2 responses. Both were detailed. I have provided a copy of those responses and it is an attachment to this letter. One response clearly explains that she does not know why it is written that way as it basically **eliminates fishing for shrimp South of Point Conceptions altogether?** How strange I thought. **Why would they write a regulation to say you can but mean you can't???? makes no sense at all. You mean I have to make sure when I read the regulations that I know you mean something different?** Your organization has integrity and I know that is not the case. Must be an error.

I responded to Warden Jason Kraus with a detailed letter asking some "Why" questions pointing out some very obvious discrepancies but that fell on deaf ears and I was not provided answers or even an email back after that.

I then went online and searched, was extremely hard to find any OTHER FISHERMAN who may have approached this subject in the past with DFG or DFW. I was surprised to find a handful of postings on web site Forums speaking about it and the consensus is that whenever DFG or DFW are asked about this or it is questioned that no one cares and no one responds. The overall reports online cast a very negative tone about the responses from local Wardens. I have attached a few of the forum quotes I found as examples. There are many more out there. I know after reading your Code of Ethics that your organization does not want to do things that cause distrust with the public as you need their support in regulation, conservation and public awareness.



Cutt *Newbie*

Location: Woodland Hills, Calif.

Name: Tim Cutt

Boat: Not Mine

Messages: (451)

Likes Received: (8)

really the DFG has ass backward regs below point conception. They don't want any traps for shrimp here and the limit is a joke... I tried to talk to them but lol good luck

Cutt, Mar 14, 2015



Bottom Line *Village idiot*

Location: Santee & San Quintin

Name: Steve

Boat: Invader CC - Bottom Line

Messages: (5,290)

Likes Received: (1,568)

This is what we have in Ca. <http://www.catalinawholesale.com/products/Spot-Prawns/>

The DFW rules make it not viable to fish/trap these recreationally.

Bottom Line, Mar 14, 2015



titos334 VIP Elite Member

Location: mission Vieja

Name: Kevin

Boat: Rainbow Surprise

Messages: (1,412)

Likes Received: (866)

They for sure are out there. I know commercial boats out of Dana Point get them deep water out in the channel. It's totally messed up, they are hardly available for sale in California and they get sent to Japan. I also don't think there is anyway to recreationally get them legally.



sdfishkiller Cod Smuggler

Location: Point Loma

Name: Todd Mora

Boat: 19' Whaler: EL SUPER LIZARDFISH

Messages: (1,977)

Likes Received: (398)

There are spot prawns locally on the 9 mile bank and other shallow offshore banks, but the DFW regs are set up to make it impossible to catch them recreationally.

There are Large Brown Shrimp, like a Mexican Brown Shrimp, which can be caught incidentally by the bait purse seiners down in Imperial Beach, but no way to target them recreationally.

Then it hit me, **"Speaking to a Warden or Complaining to a Warden is like asking a police officer to change the law....they do not make the law they are paid to enforce the law."** Same with your Wardens.

THIS IS THE REASON I HAVE CHOSE TO SEND THIS INFORMATION TO YOU TO LOOK AT AND LISTEN TO.

I BELIEVE THIS IS A MISPRINT OR AN ERROR AND NO ONE HAS PAID ATTENTION TO IT AND OR NO ONE HAS CHALLENGED IT.

If someone had I am sure there would have been a revision like back in the 90'S when the Coonstripe Shrimp Daily Bag limit was changed from 35 each to 20lbs.

"I believe it is during this change in regulation that the printed regulation error was made and this needs to be re-looked at to correct it."

Researching further I searched and found a report by your organization written by Marine Biologists.

This report is titled **Coonstripe Shrimp, *Pandalus danae***

Here is the link

<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=34427>

The report details the fishery history, reproduction, range and status of the fishery commercially and recreationally.

This report is one of the ONLY REPORTS I CAN FIND THAT MENTIONS THE TRAP OPENING SIZE OR FUNNEL SIZE OF 3" in use by commercial fisherman noted by your biologists.

"The traps are typically 39 inches (1 meter) diameter, 16 inches (41 centimeters) tall and have entry funnels 3 inches (8 centimeters) in diameter."

I have read the PDF above, the NOAA report, the Asian Pacific Report and there is minimal mention there as well.

"California has the largest directed coonstripe shrimp trap fishery on the west coast of North America."

A 3" or so opening would work along with the reports documentation on the Size of shrimp;

"Pandalid shrimp are medium to large size, have a laterally compressed body, a bladelike rostrum (spine-like extension of the anterior median carapace), well developed antennal scales and a muscular abdomen"

Research, again from British Columbia, found that males maturing in October of their first year averaged about 2.5 inches (6-7 cm) total length (TL), averaged 3.4 inches TL (8.5 centimeters) the following October and after becoming female by the third October, averaged 3.9 inches TL (10 centimeters). Large specimens can reach 5.5 inches TL (14 centimeters).

So a 1 year old shrimp is about 2.5 inches and after 3 years can reach up to 5.5 inches

Habitat damage and bycatch from this fishery is considered minimal. Since traps are set on muddy bottoms, they generally do not disturb coral, sponges and other fragile species often growing on rocks. **Small shrimp and bycatch can escape the trap through the mesh, typically 0.5 inch square openings.** Once onboard, the catch is carefully sorted and discards are thrown over, live if possible. Onboard fisheries observers have reported bycatch including hermit crabs; snails; juvenile Dungeness and rock crabs; decorator, umbrella and butterfly crabs; sunflower stars; hagfish; juvenile lingcod, cabezon and rockfish; sculpin; octopus; and other small shrimp

with those quotes directly from the Fish and Game Report you can see that the ½" MESH is for the escape of bycatch.

A Trap is a device that has an opening of one size (funnel/opening) for the shrimp to enter and smaller size openings (mesh) on the exterior of the trap so that the proper size shrimp remains in the trap and the smaller than ½ inch bycatch escapes. Does that make sense?

CCR T-14 29.80(f) Shrimp and prawn traps may be used to take shrimp and prawns only. Trap openings may not exceed ½ inch in any dimension on traps used south of Point Conception nor five inches in any dimension on traps used north of Point Conception.

With that said,

So a 1 year old shrimp is about 2.5 inches and after 3 years can reach up to 5.5 inches

How can those measurements fit in a ½" opening? They cannot. Only a Juvenile shrimp less than 1 year old can. That is catching babies and can hurt a fishery

Your current regulations of ½" openings HAS BEEN CONFIRMED TO SAY that the opening of the trap (funnel) would be ½" and that would mean the exterior MESH would have to be ¼" or smaller to keep a catch size, that can enter a ½" opening, IN. that means you would only catch JUVANILE SHRIMP.

THERE IS NO WAY THAT CAN BE THE WAY YOUR REGULATIONS WAS WRITTEN IF YOU ARE ABOUT CONSERVATION AND SUSTAINABILITY.

IT IS FOR THIS REASON I FEEL IT IS A TYPO OR SOMETHING THAT HAS BEEN OVERLOOKED WHEN DECIDED ON OR THERE WAS CONFUSION WHEN IT WAS WRITTEN. REGARDLESS OF THE WHY'S THERE IS

A PROBLEM WITH THIS AND IT IS DOING 2 THINGS;

- 1- PREVENTING A RECREATIONAL FISHERY
- 2- WILL HAVE A CATCH RATE OF ONLY JUVANILE SHRIMP EFFECTING THE ENTIRE FISHERY if anyone even tries to catch them per the regulation

I know from reading all about DFG and DFW that you are here for conservation.

I know from reading this you will care about what I have brought to you today.



A Funnel opening size of 1-1/2' - 3" would be a good starting consideration range. It would coincide with a size that would catch Avg to larger shrimp and eliminate catching juveniles.

I understand that the Crescent City area has the largest concentrations of shrimp but I do know from my own personal observation of the shrimp fleet here that the shrimp are here in enough concentrations to make catching them worth my time and enjoyment. Not to mention I really do want to have the opportunity to fish for them legally.

Please take another look at this regulation and please change it to reflect the proper language, size, and type of trap that will be appropriate to catch Coonstripe shrimp Recreationally below Point Conception.

Last request, the 35 shrimp a day limit on Spot prawns should be looked at as well as we have very nice concentrations of them in our local deep water canyons and ledges offshore.

In conclusion;

I hope that you see that the ½" opening for a legal shrimp trap is UNREASONABLE, NOT PRACTICAL AND WILL HURT THE FISHERY ONLY CATCHING JUVENILE SHRIMP AND BYCATCH – THERE IS AN ERROR OR TYPO IN THE PRINTED REGULATION AS ½" IS NOT AT ALL APPLICABLE FOR ANY OPENING ON A TRAP OTHER THAN THE EXTERIOR MESH. THE FUNNEL OPENING ENTRANCE TO THE TRAP MUST BE AT THE LEAST 1-1/2" TO A MAXIMUM OF 3"

EVEN A FRESH WATER MINNOW TRAP OPENING IS 1" STANDARD ACROSS THE WORLD FOR SMALL PINFISH AND MINNOWS. CRAWFISH TRAPS HAVE A 2" OPENING AROUND THE GLOBE AND ARE VERY CLOSE TO THE TRUE SIZE OF A COONSTRIPE SHRIMP. USE THESE AS GAGE TO SIZE AND SPECIES BEING CAUGHT.

I would not expect that DFG or the DFW would write a regulation that says in some strange way that it is legal to fish for shrimp but supply a rule or regulation that if followed would not catch any of the species but juveniles. if the intention was to prevent recreational shrimp fishing why not just say NO RECREATIONAL TAKE? WHY HAVE A REGULATION AT ALL?

it is clear and obvious that the REGULATIONS were put there to allow recreational fishing for Coonstripe Shrimp and the fact that in the 1990's the daily bag limit was changed from 35 each to 20lbs a day says that there should be a revision to this opening size and that the current regulation has a flaw that needs addressing sooner than later.

That last Biological report you have online is from 2008.

Thank you for your time and consideration. I hope I made my points clear and you make quick change to this regulation.

I look forward to your response to this issue.

Respectfully

Don Greeno

- Inbox** 2,928
- Starred
- Snoozed
- Important
- Sent
- Drafts
- DON ▾ +

No recent chats
[Start a new one](#)

Compose

- Inbox** 2,928
- Starred
- Snoozed
- Important
- Sent
- Drafts
- DON ▾ +

No recent chats
[Start a new one](#)

prawn fishing south of conception ▸ Inbox x

Julia...@wildlife.ca.gov
to me ▾

Thu, Nov 15, 3:37 PM ☆ ↶ ⋮

Hi Don,

I was forwarded your email about recreational fishing for prawn. You are correct in your reading of the regulations. Up to 20 lbs of coonstripe and up to 35 individuals of spot prawn may be taken by trap north of Pt Conception. However, south of Pt Conception the rules states that traps may have openings no greater than 1/2". This effectively eliminates trapping for prawns in this region. I believe the concern is over potential illegal take of short lobsters but I'm not sure why the rule was written in this way. I hope to revise and clarify this rule in the future. Please let me know if you have any additional questions about invertebrates.

Best,
Julia Coates

...

[Message clipped] [View entire message](#)

DON GREENO
to Julia.Coates ▾

Thu, Nov 15, 4:56 PM ☆ ↶ ⋮

Thank you

...

← ⋮

1 of 4 < > ⚙

Jason...@wildlife.ca.gov
to me ▾

Wed, Nov 14, 10:49 AM ☆ ↶ ⋮

Good Morning Don,

You can use authorized traps south of Point Conception for the recreational take of spot prawns. The trap openings may not exceed 1/2 inch in any dimension. Spot prawns fall under the general bag limit of 35.

To answer the "why" portion of your question, spot prawns are found in extremely deep water compared to coonstripe shrimp. This greatly limits a recreational fisherman's ability to successfully/safely manage the trap gear when considering the amount of line required, currents, ocean conditions and potential for lost gear. This is especially true south of Point Conception.

The more accessible prawn/shrimp trap fishery is for coonstripe shrimp north of Point Conception, where they are more prevalent. The 35 spot prawn limit allows for the incidental take of spot prawn in coonstripe shrimp recreational trap fishery.

CCR T-14 29.80(f) Shrimp and prawn traps may be used to take shrimp and prawns only. Trap openings may not exceed 1/2 inch in any dimension on traps used south of Point Conception nor five inches in any dimension on traps used north of Point Conception.

CCR T-14 29.08(a) Except as provided in this article there are no closed seasons, closed hours or minimum size limits for any invertebrate. The bag limit on all invertebrates for which the take is authorized and for which there is not a bag limit otherwise established in this article is 35.

Hopefully this answers your questions,

Lieutenant Jason Kraus

1 Coonstripe Shrimp, *Pandalus danae*



A coonstripe shrimp, *Pandalus danae*, caught near Crescent City, California. Photo credit: J. Bieraugel.

History of the Fishery

The California commercial fishery for the coonstripe shrimp, *Pandalus danae*, is a relatively new fishery. The first landing record for this species was in 1995; however, they were likely landed in small amounts prior to 1995 and recorded only in a general shrimp market category. Commercial coonstripe shrimp regulations adopted by the California Fish and Game Commission in 2002 (Title 14, CCR, §180.15) were devised cooperatively by the California Department of Fish and Game (Department) and fishers. Prior to 2002, the fishery was essentially unregulated. Current regulations cover general trap and vessel permit requirements, prohibit trawling, specify a closed season from November 1 through April 30, and provide a control date for a possible limited entry fishery. Logbooks are not required.

California has the largest directed coonstripe shrimp trap fishery on the west coast of North America. Most of the fishing activity takes place within a few miles of Crescent City Harbor. A formerly active trap fishery in southern Oregon has dwindled, culminating in landings of less than 10 pounds per season (4.5 kilograms per season) for the past three years. In the San Juan Islands of Washington state, there is small trap and trawl fishery for coonstripe shrimp. In southern British Columbia, there is short season trap fishery, a small directed trawl fishery and some coonstripe shrimp are caught incidentally in pink and sidestripe shrimp trawls. Total trap and trawl landings in both Washington and British Columbia are similar in size to California's trap fishery. In Alaska, coonstripe shrimp are not targeted, but are landed incidental to other fisheries.

The California commercial fishery for coonstripe shrimp had its first significant landings in 1996 and remained relatively stable from 1997 through 2002, averaging 78,200 pounds (36 metric tons) per year. After declining to a low of 22,200 pounds (10 metric tons) in 2007, the 2008 season yielded 85,200 pounds (39 metric tons), the second largest annual landings. Average landings for the fishery, since 1996, are almost 62,800 pounds (28 metric tons) (Figure 1-1).

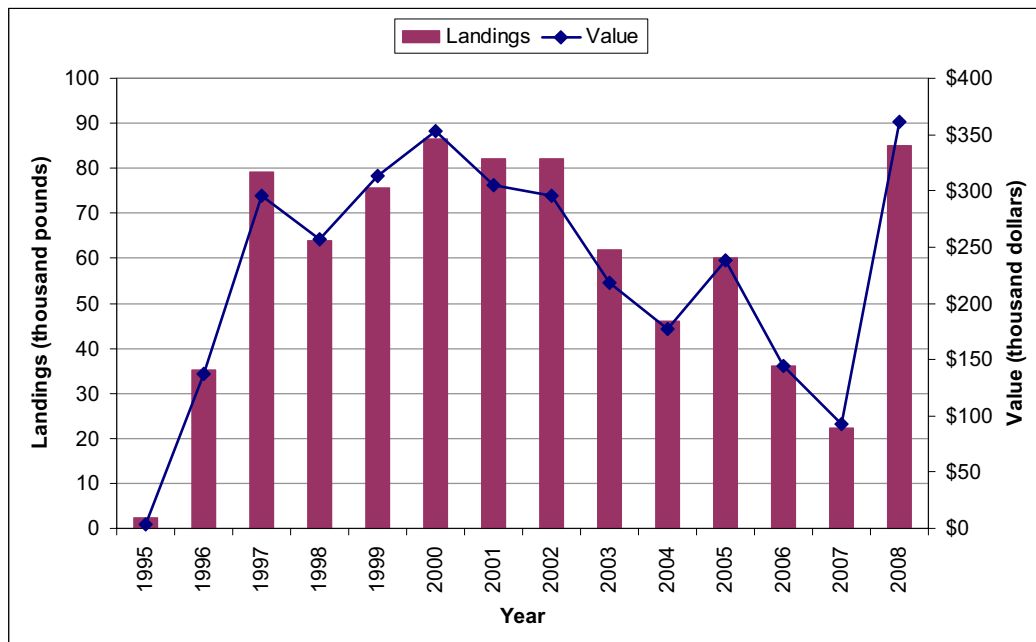


Figure 1-1. Coonstripe shrimp commercial landings and value, 1995-2008. Data source: CFIS data, all gear types combined.

Although catch-per-unit-effort is reportedly low, a high price per pound keeps diligent fishers interested. Fishers often soak gear for several days and can store several trips worth of Coonstripe shrimp alive before selling to the fish buyer. Count per pound ranges from 23 to 40 shrimp, but buyers prefer lower counts of larger shrimp. The live product is shipped to markets in the San Francisco and Los Angeles areas where consumers pay \$5.99 to \$6.99 per pound (\$13.20 to \$15.40 per kilogram), depending on quality. Since 1996, the average price paid to fishers has ranged from \$3.52 to \$4.25 per pound (\$7.77 to \$9.36 per kilogram). Paid the latter in 2008, total ex-vessel value was \$361,800 (Figure 1-1). Average annual ex-vessel value from 1996 to 2008 was \$245,400.

As an open access fishery, the size and composition of the fleet varies each year. Since 1995, there has been between 1 and 20 vessels making landings – mostly directed and some incidental. Only a few fishers consistently make substantial landings, others come and go. Seven vessels made landings in 2008, with four vessels catching the majority of the shrimp. All seven are also commercial Dungeness crab vessels. The coonstripe shrimp season, May 1 through October 31, complements the Dungeness crab season, December 1 through July 15. Since the enactment of the coonstripe shrimp vessel trap permit requirement in 2002, there are typically three times the number of permits sold as are used each year.

In the Crescent City area, fishers set traps on the muddy bottom near rocky reefs. The latest trap style is a tapered, circular design from Canada (Figure 1-2). Each trap weighs less than 10 pounds (4.5 kilograms) and is constructed of mesh over a stainless steel frame. The traps are typically 39 inches (1 meter) diameter, 16 inches (41 centimeters) tall and have entry funnels 3 inches (8 centimeters) in diameter. Traps are fished in sets of 10 to 15 connected together on a long line string. Each end of the set is held down by a weight and marked with a buoy on the surface. Fresh fish, usually sardines, mackerel, herring or albacore, is used as bait. Some fishers position their traps at a rather specific depth, about 25 fathoms (46 meters), while others vary the depth and prospect as shallow as 12 fathoms (22 meters). The predominant fishers have about 500 traps, and may fish fewer. Gear is rarely lost, but does wear out.



Figure 1-2. A Crescent City commercial fisher empties a typical coonstripe shrimp trap onto a sorting table. Photo credit: J. Bieraugel.

Habitat damage and bycatch from this fishery is considered minimal. Since traps are set on muddy bottoms, they generally do not disturb coral, sponges and other fragile species often growing on rocks. Small shrimp and bycatch can escape the trap through the mesh, typically 0.5 inch square openings. Once onboard, the catch is carefully sorted and discards are thrown over, live if possible. Onboard fisheries observers have reported bycatch including hermit crabs; snails; juvenile Dungeness and rock crabs; decorator, umbrella and butterfly crabs; sunflower stars; hagfish; juvenile lingcod, cabezon and rockfish; sculpin; octopus; and other small shrimp.

Interest in recreational fishing also rose in the 1990s, presumably because the growing commercial fishery showed that the shrimp could be fished close to shore with lightweight traps. The recreational limit was increased from the general invertebrate species limit of 35 shrimp per day to 20 pounds (9 kilograms) per day in 1998 (Title 14, CCR, §29.88). There is no closed season or size limit for the recreational fishery. Effort and catch are believed to be minimal, although fishery surveys have not been conducted. This species is not targeted by commercial passenger fishing vessels.

Status of the Biological Knowledge

Coonstripe shrimp are crustaceans in the order Decapoda containing lobsters, crayfish, crabs and other shrimp. These caridean shrimp are members of the Pandalidae family, a family of cold water shrimp containing 24 genera and 162 species. Pandalid shrimp are medium to large size, have a laterally compressed body, a blade-like rostrum (spine-like extension of the anterior median carapace), well developed

antennal scales and a muscular abdomen. The muscular abdomen, used for swimming propulsion, has little room for organs—making it desirable as food. Antennal scales act as rudders and brakes and make possible elaborate escape maneuvers. Pereopods, the longest limbs, are relatively small and more suited to perching than walking. Pincers (claws called chelae), usually on the first two pereopods, are small or lacking in pandalids. The coonstripe shrimp has unevenly sized chelipeds (pereopods with chelae), favoring one side for feeding and other for grooming. They are known to spend a considerable amount of time keeping body surfaces and chemoreceptors clean. Their limbs are equipped with tiny brush and comb-like groups of setae especially for this purpose. The rostrum terminates in three points and has 7 to 16 dorsal spines and 5 to 10 ventral teeth. Body color is generally a milky-translucent background with prominent red to brown stripes and dots, sometimes with white markings and blue dots. There are broken, diagonal stripes on the abdomen and strong banding on the legs and antennae. The name coonstripe is sometimes attributed to other pandalid shrimp species which also bear striped markings.

Coonstripe shrimp is also referred to as dock shrimp for its habit of sometimes living around pilings. Normally, juveniles live in shallower water while adults live in the sublittoral zone at depths up to 606 feet (185 meters). This epibenthic shrimp inhabits a variety of bottom substrates, from mud to gravel, usually in areas with strong currents and shelter to hide in by day. Wide ranging, they are found from Sitka, Alaska to at least Point Loma, California (San Diego County). The southern end of their range has been incorrectly stated as far north as San Francisco, but with confirmation that *Pandalus gurneyi* is a synonym of *P. danae*, it is likely that the coonstripe shrimp range extends into Baja California, Mexico. Sporadically caught in many fisheries and surveys, they have only been found in densities high enough to support a fishery in a few select locations. Prey items include polychete worms and small invertebrates such as copepods and amphipods. Predators are likely octopus, crabs and various groundfish. Biological information on coonstripe shrimp is somewhat limited.

Coonstripe shrimp were the first of the pandalid shrimp to be described as protandrous hermaphrodites, beginning as males and transforming into females during the course of their lives. Most of the shrimp hatch as males in the spring, usually April, and spend about 3 months nearby as larvae. Larvae are complete with two pairs of antennae, mandibles, eyes and thoracic appendages used for swimming. Once the juvenile form is attained, usually by June, they undergo rapid molting and growth. Four months later, usually October, they are sexually mature and begin breeding. In their second year of breeding most are still males. Subsequently, the shrimp begin transforming into females. In their third year, they breed as females and probably do not survive another year. A small percentage of coonstripe shrimp are primary females, hatching and living their entire lives as females, thus adding resiliency to the species. This anomaly is assumed to increase in response to environmental pressures, such as fishing selectively for large females, which may unbalance the sex ratio. However, laboratory experiments indicate that for coonstripe shrimp, genetics is a stronger influence on sex determination. Sex change triggers are still poorly understood.

Coonstripe shrimp are unusual shrimp in that ovigerous (egg bearing) females can be found throughout the year (Figure 1-3). In studies from southern British Columbia, egg bearing females were mainly encountered from November to April. Recent anecdotal information from the California fishery indicates egg bearing females are encountered throughout the fishing season, especially near the beginning. Dockside sampling conducted by the Department in 1997,



Figure 1-3. A female coonstripe shrimp bearing eggs (green) along the underside of her abdomen. Photo credit: Scott Groth, ODFW.

prior to the seasonal closure regulation, found the number of ovigerous females caught in the Crescent City fishery declined from 100 percent at the end of March to less than five percent at the end of June. During May 1997, corresponding to the first month of the current season, at least 50 percent of females caught were ovigerous. Larval recruitment in the closely related pink shrimp, *Pandalus jordani*, has been linked to ocean conditions and the strength and timing of the spring transition. Each year, along the Pacific Coast of North America between San Francisco, California (38° North Latitude) and the Queen Charlotte Islands, British Columbia, Canada (52° North Latitude), the coastal winds switch from the southerly winds of winter to the northerly winds of summer producing the spring transition. Some years, the impact of taking egg bearing females in late spring can have a large effect on recruitment because those may be the very eggs with the best chance of survival. Further investigation is necessary to understand how this concept relates to coonstripe shrimp recruitment.

The habit of continual breeding also complicates determining size at age for coonstripe shrimp. Research, again from British Columbia, found that males maturing in October of their first year averaged about 2.5 inches (6-7 cm) total length (TL), averaged 3.4 inches TL (8.5 centimeters) the following October and after becoming female by the third October, averaged 3.9 inches TL (10 centimeters). Large specimens can reach 5.5 inches TL (14 centimeters).

Coonstripe shrimp find their mates using a strategy called pure searching. Males do not guard the female or a territory. This avoidance of conflict allows them to be smaller without the necessary fighting chelipeds. The two sexes have chance encounters and may not even acknowledge each other until after the female molts and is therefore ready to mate. This strategy is found in populations of mobile species occurring in sufficient density that meetings are frequent. Mating is brief and females have the option to physically reject copulation and the depositing of the spermatophores. Soon after successful mating, the female extrudes, fertilizes and attaches the eggs to her swimming appendages where they are carried until hatching. Incubation of the eggs by the female produces lower fecundity but also lowers mortality before hatching. Cold water shrimp carry only a few hundred to a few thousand eggs each year and coonstripe shrimp averages 1140 eggs per year. This is a relatively small amount compared to warm water shrimp who release tens of thousands of eggs

annually. Like most cold water shrimp, the life history of coonstripe shrimp makes them unsuitable for aquaculture and susceptible to overfishing, especially in combination with habitat damage or climate change. There is currently no aquaculture of this species.

Status of the Population

Based on the short history of the fishery, the effort, landings and value appear relatively stable. However, to date there have been no estimates of abundance or other population parameters, such as recruitment and mortality rates, with which to assess the stock for sustainability. The relatively limited distribution of the fishable stock of coonstripe shrimp would seem to increase its vulnerability to overfishing.

Management Considerations

Although there are currently few active participants, coonstripe shrimp is an open access commercial fishery with no trap limits, and each year about three times as many permits are sold as vessels make landings. There is little to no interest within the industry in pursuing a permit or trap restriction program at this time. However, a control date of November 1, 2001 has been set in case a restricted access program is considered in the future (Title 14, CCR, §180.15); trap limits should be considered simultaneously. Gear cost and low catch-per-unit-effort will likely keep both the commercial and recreational fisheries from expanding rapidly, but effort should be monitored.

The current seasonal closure of the fishery is based on biological information from Canadian stocks, a short dockside sampling program in Crescent City and recommendations from local fishers. Although the season is designed to avoid the most common period of egg bearing females—sampling catch composition over a longer time period would check the effectiveness of this strategy. There is no closed season for the recreational fishery; egg bearing females can be legally harvested year round. Conservative management of this fishery is necessary because of the lack of data on this species. Further investigation of life cycle timing, the relationship of larval recruitment to ocean conditions and what portion of the stock is taken each year would help determine the impact of harvesting ovigerous females.

Brooke A.B. McVeigh

California Department of Fish and Game

BMcVeigh@dfg.ca.gov

Further Reading

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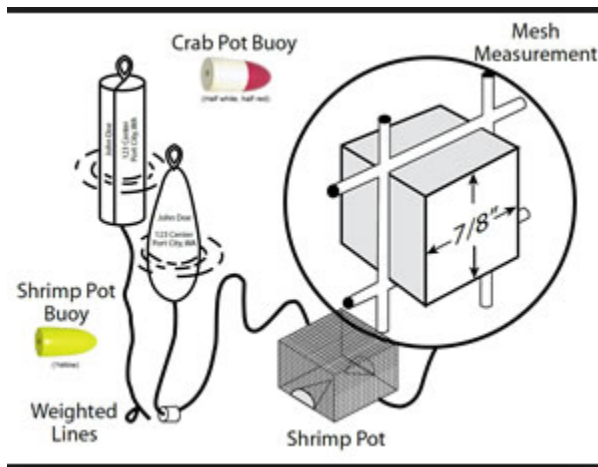
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http://www.montereybayaquarium.org/cr/cr_seafoodwatch/content/media/MBA_Seafood_Watch_ColdwaterShrimpReport.pdf

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Coonstripe shrimp commercial landings and value, 1995-2008.		
Year	Pounds	Value
1995	2,486	\$3,729
1996	35,136	\$137,734
1997	79,173	\$295,017
1998	63,809	\$256,431
1999	75,540	\$312,906
2000	86,369	\$353,627
2001	82,149	\$305,265
2002	82,239	\$295,505
2003	62,003	\$218,533
2004	45,989	\$177,448
2005	60,184	\$238,551
2006	35,937	\$144,664
2007	22,142	\$92,706
2008	85,176	\$361,801

Data Source: CFIS data, all gear types combined.



All information on line show exterior MESH size and almost never mentions OPEING SIZE

Here is Washington's State regulations for shrimp that is very descriptive

All crab gear buoys must be half red and half white in color, and both colors need to be visible when fishing.

SHRIMP GEAR:

Pots must be constructed of either flexible or rigid mesh material (no liners allowed).

Entrance tunnels can be made of any size mesh material but must be located on the sides of the pot. The sum of the maximum tunnel widths must not exceed one-half the perimeter of the bottom of the pot.

Shrimp pots must not exceed 10 feet in perimeter and 18" in height.

All shrimp pot buoys must be yellow in color.

SHRIMP POT MESH SIZE:

1" Minimum Mesh Size

A $7/8$ " square peg must be able to pass through each mesh opening – see diagram, except for flexible (web) mesh pots, where the opening must be a minimum of $1\frac{1}{4}$ " stretch measure.

Puget Sound:

Required for all shrimp pots during the month of May.
Required in all areas open for spot shrimp after June 1st.

Pacific Ocean:

Required year-round; Shoreward of 20 fathoms, the minimum mesh size for shrimp pots is 1/2-inch; Seaward of 20 fathoms, the minimum mesh size for shrimp pots is 1 inch.

1/2" Minimum Mesh Size

A $3/8$ " square peg must be able to pass through each mesh opening, except for flexible (web) mesh pots, where the opening must be a minimum of $1\frac{1}{4}$ " stretch measure.

Puget Sound:

Allowed after June 1st in any area closed for spot shrimp, but open for coonstripe and pink shrimp.

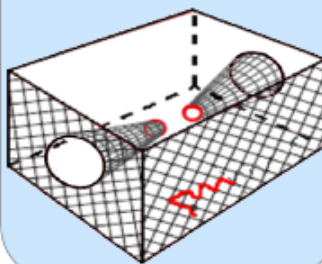
Shrimp Pots

Escape Mechanism

- Sidewall opening of 6 inches, located no more than 6 inches from the base and parallel to it, secured with a single piece of 30-thread, 100% untreated cotton twine.
- If your pot is made of rigid mesh, see the "rigid mesh" section on the reverse side.

Tunnel Eye and Size Requirements

- No more than 4 tunnel eye openings.
- Each opening cannot exceed 15 inches in perimeter.
- Bottom perimeter cannot exceed 153 inches and total volume cannot exceed 25 cubic feet.



Buoy Markings

Shellfish pot buoys must be marked with:

- Angler's first initial and last name
- Home address
- DMV-issued AK vessel numbers or the vessel name



Importance of Escape Mechanisms

The purpose of biodegradable escape mechanisms in shellfish pot gear is to prevent unnecessary mortality by allowing shellfish to escape if pots are lost or left unattended. These mechanisms rely on the use of untreated biodegradable cotton twine which will provide an opening in the pot when the twine degrades.

License applications and harvest regulations are available at <http://www.adfg.state.ak.us>. Emergency orders, which always supersede regulations, are also available at the web site. For more information regarding bag and possession limits or to locate the ADF&G office closest to you, call (907) 465-4270.

The Alaska Department of Fish and Game (ADF&G) administers all programs and activities in compliance with state and federal civil rights and equal opportunity laws. Obtain full ADF&G and Americans with Disabilities Act and Office of Equal Opportunity statement on line at <http://www.adfg.state.ak.us> or call (907) 465-4270.

Shellfish Pot Requirements



- Dungeness Pots
- King / Tanner Crab Pots
- Shrimp Pots
- Buoy Requirements

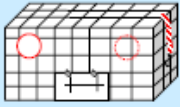


Alaska Department of Fish and Game
Division of Sport Fish
802 3rd St., Douglas, AK 99811
P.O. Box 110024, Juneau, AK 99811
(907) 465-4270
<http://www.adfg.state.ak.us>

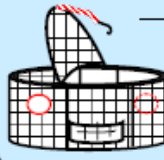
©2011 Alaska Department of Fish and Game

Dungeness Pots

Escape Rings
Two rings on opposite sides of the pot. These must be positioned within the upper half of the vertical plane and have at least 4 1/4" inside diameter.

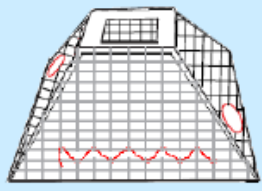


Biodegradable Escape Mechanism
One of two options:
1. A sidewall opening 18 inches or more in length, located no more than 6" from the base and parallel to it, secured with a single piece of 100% untreated cotton twine, no larger than 30-thread count.
2. The pot lid may be secured with a single loop of 100% untreated cotton twine no larger than 60-thread count. When the twine degrades, the lid must not be securely closed.

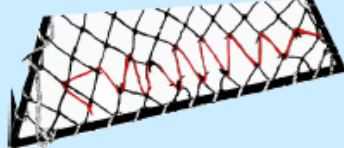


King & Tanner Crab Pots

Escape Rings
Two rings on opposite sides of the pot.
• **Tanner:** escape rings need to be 4 1/4" inside diameter.
• **King:** escape rings need to be 6 1/4" inside diameter.



Biodegradable Escape Mechanism
A sidewall opening 18 inches or more, which is located no more than 6 inches from the base and parallel to it, secured with a single piece of untreated cotton twine no larger than 30-thread count.



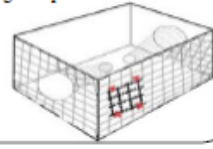
Checklist for a legal pot


- ☐ Correctly sized escape rings in the proper location
- ☐ Proper biodegradable escape mechanism
- ☐ Properly marked buoy
- ☐ Shrimp pot does not exceed size or tunnel eye opening requirements

Rigid Mesh Pots

Rigid mesh pots have different biodegradable escape mechanism requirements.

- One side of the pot must have a panel which will drop away when the twine securing it degrades.
- This panel size varies by pot type:
 - King or Tanner: 12 x 8 inches
 - Dungeness: 10 x 6 inches
 - Shrimp: 4 x 4 inches
- The lower and longest edge of the rectangle must be parallel to and within 6 inches of the bottom of the pot.
- The panel can be secured with no more than 4 loops of 100% untreated cotton twine no larger than 30-thread. Each of these loops can only have one knot and may not be laced along the opening.
- A biodegradable pot lid tie down can be used in place of a fall away panel in Dungeness pots.




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Recreational Commercial Gear License Pots

Gear Requirements - Shrimp pots cannot have a mesh smaller than 1 1/4 inches stretch or 5/8 inch bar. Eel pots have a minimum mesh size of 1/2 inch by 1/2 inch.

Crab pots must have a minimum of three escape rings per pot that are at least 2 5/16 inches inside diameter.

For crab pots with a divider: 1) Two escape rings are located on opposite outside panels of the upper chamber of the pot.

This shows that even North Carolina has an exterior mesh requirement of nothing SMALLER THAN 1 1/4" STRECH OR 5/8 BAR. This is so bycatch can escape and the shrimp in North Carolina are a much smaller species of shrimp.



Tracking Number: (2019-001)

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Incomplete forms will not be accepted. A petition is incomplete if it is not submitted on this form or fails to contain necessary information in each of the required categories listed on this form (Section I). A petition will be rejected if it does not pertain to issues under the Commission's authority. A petition may be denied if any petition requesting a functionally equivalent regulation change was considered within the previous 12 months and no information or data is being submitted beyond what was previously submitted. If you need help with this form, please contact Commission staff at (916) 653-4899 or FGC@fgc.ca.gov.

SECTION I: Required Information.

Please be succinct. Responses for Section I should not exceed five pages

1. Person or organization requesting the change (Required)

Name of primary contact person: Walter Lamb, Ballona Wetlands Land Trust

Address:

Telephone number:

Email address: landtrust@ballona.org

2. Rulemaking Authority (Required) - Reference to the statutory or constitutional authority of the Commission to take the action requested: Fish and Game Code Section 1580 ["The commission may adopt regulations for the occupation, utilization, operation, protection, enhancement, maintenance, and administration of ecological reserves."]

3. Overview (Required) - Summarize the proposed changes to regulations: This petition proposes to amend Section 630 of the Code of California Regulations, Title 14 to eliminate commercial parking use in the Ballona Wetlands Ecological Reserve, by changing the language in paragraph (h)(3) from "existing parking areas may be allowed under leases to the County of Los Angeles" to "existing parking areas may be allowed under leases to the County of Los Angeles provided such leases are limited to parking uses by public agencies that perform services for the Ballona Wetlands Ecological Reserve and that such leases prohibit parking for commercial use." The purpose of this proposed change is to convert a substantial portion of approximately 72,600 square feet of paved parking lot, used primarily by employees a private shopping plaza, and to a lesser extent by agencies of Los Angeles County, to a use more compatible with a public ecological reserve.

4. Rationale (Required) - Describe the problem and the reason for the proposed change: California taxpayers spent \$139 million 15 years ago to acquire the land which now makes up the Ballona Wetlands Ecological Reserve. This included approximately \$129 million of Proposition O public bond funds and \$10 million of Proposition 12 public bonds funds. Neither of these public bond fund measures was approved by the voters to provide commercial parking space to local businesses. Yet, approximately 72,600 square feet of land currently leased to Los Angeles County, Department of Beaches and Harbors ("Beaches and Harbors"), includes parking for employees of the businesses in



Fisherman's Village, across Fiji Way from the ecological reserve. The current parking exception was adopted by the Commission at its August 19, 2005 meeting.

Los Angeles County currently pays the Department of Fish and Wildlife \$1,608 per year to lease approximately 254 parking spaces, the same amount it has paid since approximately 1995. Only a small portion of this lot is used by the Department of Fish and Wildlife for its vehicles and an office trailer.

Section 630 currently provides the Department with sole discretion as to whether a more appropriate use of this parcel should take precedence over the existing parking use. There is no question that this parcel of land can and would be more appropriately used if the Department exercised that discretion, but the Department has not done so. Therefore the only available remedy short of litigation available to stakeholders of the ecological reserve is to request this regulatory change.

The existing commercial parking use violates the public bond fund measures used to acquire the land, violates the temporary Coastal Development Permit issued in 1988 and intended to be in effect for approximately five years, and violates the prohibition in the California Constitution against gifts of public funds, given the discrepancy between the fair market value of the parking spaces and what the County actually pays the Department pursuant to the lease agreement.

New Information:

When a resubmitted version of this petition was denied in December of 2017, the Commissioners expressed a consensus that the petition was not necessarily without merit, but that they felt it was premature since comments were still being received in response to publication of the draft Environmental Impact Report for the restoration of the Ballona Wetlands. The Land Trust disagreed with that assessment, because the Commission's duties to maintain appropriate regulations is independent from the Department's duties pursuant to the California Environmental Quality Act (CEQA). Nonetheless, the public comment period was closed on February 5, 2018 and the Department has had almost a year to respond to the public comments received. The Department has made statements at subsequent FGC meetings with regard to the parking lots indicating changes to usage of the parking areas in question, but those changes appear not to have been implemented.

Additionally, new documents have been obtained by the Land Trust (some pursuant to litigation settlement with Los Angeles County) that further reinforce the commercial use aspect of the parking area in question. These documents clearly show collaboration between the County and local businesses to influence land use decisions in a manner that would favor their business interests over the public's interest in restoring the Ballona Wetlands as native wildlife habitat.

Finally, this petition is significantly different than the previous petition in that it seeks only the prohibition of parking for commercial purposes, not the prohibition of parking by public agencies.

For these reasons, we are confident that this petition merits consideration at the April 2019 meeting of the California Fish and Game Commission.

SECTION II: Optional Information

5. Date of Petition: January 03, 2019



6. Category of Proposed Change

- ☐ Sport Fishing
- ☐ Commercial Fishing
- ☐ Hunting
- ☒ Other, please specify: Ecological Reserves

7. The proposal is to: *(To determine section number(s), see current year regulation booklet or <https://govt.westlaw.com/calregs>)*

- ☒ Amend Title 14 Section(s):630
- ☐ Add New Title 14 Section(s):
- ☐ Repeal Title 14 Section(s):

8. If the proposal is related to a previously submitted petition that was rejected, specify the tracking number of the previously submitted petition 2017-002
Or ☐ Not applicable.

9. Effective date: If applicable, identify the desired effective date of the regulation.
If the proposed change requires immediate implementation, explain the nature of the emergency: As soon as practically possible, but not an emergency

10. Supporting documentation: Identify and attach to the petition any information supporting the proposal including data, reports and other documents: Please see attached documents relating to the existing parking use and proposed parking structure, including new information that the Land Trust obtained after the June 21 hearing on our original petition

The Ballona Wetlands Draft EIR is on the CDFW site: <https://www.wildlife.ca.gov/Regions/5/Ballona-EIR>

The archived audio of the 2005 Fish and Game Commission hearing is at http://cal-span.org/media/audio_files/cfg/cfg_05-08-19/cfg_05-08-19.mp3 and the discussion of the parking lots occurs at 223 minutes and 25 seconds (3:43.25).

11. Economic or Fiscal Impacts: Identify any known impacts of the proposed regulation change on revenues to the California Department of Fish and Wildlife, individuals, businesses, jobs, other state agencies, local agencies, schools, or housing: Eliminating the existing parking lease with Beaches and Harbors would result in the loss of \$1,608 in annual lease payments, which is substantially below market value. The land Trust has offered to more than offset that amount if the paved lots can be converted to more appropriate use.

Additionally, due to lease payments that are clearly well below market value, and because parking for a shopping plaza and an unrelated County agency do not further the public purpose of the ecological reserve and the Department of Fish and Wildlife generally, the state could be in violation of the constitutional provision against gifts of public funds between agencies, as noted above.

12. Forms: If applicable, list any forms to be created, amended or repealed:



SECTION 3: FGC Staff Only

Date received:

RECEIVED
CALIFORNIA
FISH AND GAME
COMMISSION

FGC staff action:

- ☐ Accept - complete
- ☐ Reject - incomplete
- ☐ Reject - outside scope of FGC authority

2019 JAN -7 AM 8:30

Tracking Number

Date petitioner was notified of receipt of petition and pending action: _____

Meeting date for FGC consideration: _____

FGC action:

- ☐ Denied by FGC
- ☐ Denied - same as petition _____
- ☐ Granted for consideration of regulation change

Tracking Number

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SECTION I: Required Information.

Please be succinct. Responses for Section I should not exceed five pages

- **Person or organization requesting the change (Required)**

Name of primary contact person: Brian Gorrell

Address:

Telephone number:

Email address:

- **Rulemaking Authority (Required)** - Reference to the statutory or constitutional authority of the Commission to take the action requested: Sections 713, 1050 and 8587.1, Fish and Game Code. Reference: Sections 1050, 7852.2, 8046, 8589.5 8589.7, 9001 and 9001.5

- **Overview (Required)** - Summarize the proposed changes to regulations: Add additional "trap endoresment" opportunities to (Nearshore permit holders) who purchased (2) Nearshore permits to create (1)Nearshore Permit, in compliance with the limited entry permit reduction process, that ended last year.

- **Rationale (Required)** - Describe the problem and the reason for the proposed change:

The Problem: Fishing with hook and line only: Sea Lions, Harbor Seals, Sharks, By-Catch, Undersized Fish, and all other Marine Life, can be hooked on the hook, and or gear.

-Either: they bite the bait, or they eat the fish that has already eaten the bait, and been hooked.

- The fish that are coming up, are often injured or half eaten, do to predation while underwater. As soon as a fish is hooked, it becomes easy prey for other predators, regardless of its species or size.

- The best case scenario, is the fish only has a hole in its face from the hook. (This can be very extreme, as they try to tear themselves off of the hook, to the point they will tear their own jaw off)

- This is unnecessary, and cruel.

- Many fish that are eaten off the line or killed, are undersized, and/or bycatch, and possibly endangered, or protected species.

- Harbor Seals, Sea Lions, and other marine life are caught on the hooks and fishing gear, and often drag the fishing gear to shallower or unsafe waters.

- I live, and fish commercially, in the Monterey Bay Marine Sanctuary We have many protected, resting areas for Harbor Seals and Sea Lions. I have been told that their numbers are at an all time high right now.

- I am committed to sustainable fishing, and protecting species for future generations. This is not possible under the current "hook and line" restrictions I am currently forced to use.

-I come from a fishing family. We have always used traps, the rest of my family has trap endorsed permits. It is more efficient for the fisherman, and less destructive to other marine life.

As a direct result of the buy (2) Nearshore permits, and receive (1) Nearshore permit process:

-A prospective permittee who wanted to fish for nearshore species with traps, was required to have at least (1) of the permits he was to purchase have a trap endorsement already attached to the permit.

-Those of us who were among the last to be held under this permit process, found it very difficult to find a permit for sale, and even harder to find a second permit for sale. If you were lucky enough to find a permit for sale you bought it, trap endorsed or not.

-There were no trap endorsed permits for sale from 2011 until 2017 when the permit process changed.

-In 2011- It took me a full year to find my first permit, I bought it. Then, it took me over a year to find my second permit. I was already paying for my first one for a year and still unable to fish. When the second one came around I bought it. I had to start fishing ASAP to pay for my permit that I was already paying for. Unfortunately it was not “trap endorsed”

****People with a “trap endorsed permit” were reluctant to separate their “endorsement” from their permit.**

-This would make their permit less valuable as a whole.

- If they already had a trap endorsement, and were fishing, then they were fishing with traps. If they sold their endorsement, they would have to change their fishing method, to a less productive method.

-Those fisherman who could afford to wait, wanted to wait, until the permit process changed to see what their permits would be worth.

Because of this, no one wanted to sell their trap endorsement.

The Department has been talking a lot about the future of fishing. The future generations, and sustainability of fisheries..

I am . I am part of the future generation. I care about sustainability, and the protection of species for future generations.

I am asking you to use your power to change, to help me do just this.

SECTION II: Optional Information

- **Date of Petition:** 1/24/2019
- **Category of Proposed Change**
 - ☐ Sport Fishing
 - ☒ Commercial Fishing
 - ☐ Hunting
 - ☐ Other, please specify:

- **The proposal is to:** (*To determine section number(s), see current year regulation booklet or <https://govt.westlaw.com/calregs>*)

☐ Amend Title 14 Section(s): 1050, 7852.2, 8046, 8589.5, 8589.7, 9001 and 9001.5

☐ Add New Title 14 Section(s):

☐ Repeal Title 14 Section(s):

- **If the proposal is related to a previously submitted petition that was rejected, specify the tracking number of the previously submitted petition** 2017-010

Or ☐ Not applicable.

- **Effective date:** If applicable, identify the desired effective date of the regulation. If the proposed change requires immediate implementation, explain the nature of the emergency: ASAP. Every time I go out fishing, I am killing, and injuring unintended species with my hooks. This is very serious, and requires immediate implementation to preserve life.

- **Supporting documentation:** Identify and attach to the petition any information supporting the proposal including data, reports and other documents: I attending 3 meeting last year, I spoke to the commission and the committee, and did a visual video presentation.

- **Economic or Fiscal Impacts:** Identify any known impacts of the proposed regulation change on revenues to the California Department of Fish and Wildlife, individuals, businesses, jobs, other state agencies, local agencies, schools, or housing:

- CDFW revenue from trap endorsement renewal yearly

- Fishermen gain revenue, as traps usually catch and preserve the lives of more fish.

- live fish businesses would have healthier fish that are not wounded constantly.

- schools would be able to educate their students about why we choose different methods of fishing to preserve marine life.

- Marine life is unable to become hooked. Therefore preserving life.

- Fishermen will be able to catch more fish at once, with less loss and mortality, therefore allowing them to make less trips, help them to pay their rent/mortgage, and not become homeless.

- **Forms:** If applicable, list any forms to be created, amended or repealed:

SECTION 3: FGC Staff Only

Date received:

RECEIVED
CALIFORNIA
FISH AND GAME
COMMISSION

FGC staff action: 2019 JAN 24 AM 11:20

- ☐ Accept - complete
- ☐ Reject - incomplete
- ☐ Reject - outside scope of FGC authority

Tracking Number

Date petitioner was notified of receipt of petition and pending action: _____

Meeting date for FGC consideration: _____

FGC action:

- ☐ Denied by FGC
 - ☐ Denied - same as petition _____

Tracking Number

- ☐ Granted for consideration of regulation change

From: SYDNEY HARVEY
Sent: Tuesday, December 18, 2018 11:21 AM
To: FGC
Subject: Bow hunting of bears
Attachments: FAST AS A SPEEDING BULLET.docx

Dear Ms. Miller-Henson,

Please distribute the attached Opinion Piece I wrote to all the Commissioners.

Thank you,
Sydney M. Harvey, PhD

FAST AS A SPEEDING BULLET - BUT PROBABLY NOT!

It is generally understood that arrows kill by cutting blood vessels, whereas bullets destroy or damage massive amounts of tissue in addition to causing bleeding. This bullet induced tissue damage can result in shock and/or vital organ destruction even though the organ is not directly touched by the bullet. Large animals, when hit by a bullet targeted correctly, commonly fall dead on the spot; large animals, when struck by an arrow, are wounded but do not necessarily die immediately, they may bleed out in a matter of minutes, run away and die a lingering death, or survive maimed until starvation or infection causes death days to months later. In an article in huntingintheusa.com, comparing bow and rifle hunting, it is estimated that an animal may have to be shot up to 14 times with an arrow before it dies.

A few weeks ago, many news outlets carried the story of an archery hunter mauled by a black bear he mortally wounded but didn't immediately kill. This happened during California black bear archery hunting season that opened August 18 and ran through September 9th. A short hunting season, but a brutal one. To quote archery-only black bear guide, Rob Nye, writing in the Bear Hunting Magazine (BHM) May 7, 2014, "Unfortunately, I have also followed over 100 blood trails that ended in unrecovered animals. The wounding rate of bears by bowhunters can be high." California Code of Regulations Title 14, Fish and Game, 401 (d) (2) relating to how animals must be killed states, "The permittee and/or agent shall ensure that all animals are killed in a humane manner instantly and prevent any injured animal from escaping." Does archery hunting of black bears sound "humane" or "instant" and do bow hunters "prevent any injured animals from escaping"?

Can archery hunting of bears ever be humane? The short answer is no. Bear anatomy varies significantly from that of other animals, a fact that is critical but not necessarily well known. In addition, bears have larger bones, musculature and tougher hides than other game animals making arrow penetration less probable. Because even bow hunters appear to recognize the fallacy of humane archery bear hunting as practiced by many hunters, the National Bowhunter Education Foundation publishes an educational pamphlet titled Advanced Black Bear Anatomy and Shot Placement Guide (No. 8447) in which specific instructions are given for where and how to place an arrow for maximum lethality. However, in all the diagrams the bear assumes the perfect position at the correct distance for arrow release - a position and distance not readily achievable in the wild.

Which brings us to the ultimate question - why do people hunt bears? To put dinner on the table? According to common opinion, bear meat is unpalatable to most people. It is very gamy, must be cooked slowly over an extended period and, depending on the food consumed by the bear recently, may be downright repugnant. Yet, according to Liz Orme of the Law Enforcement Division of the California Department of Fish and Wildlife (CDFW), "'wanton waste' is a crime and a hunter is required by law to utilize the edible portions of any harvested game animal". And none of the meat can be sold. Is it trophy hunting? I say Yes. But, again, Liz Orme states, "'Trophy Hunting' implies the hunter is seeking only the head, hide, horns, etc. of the target animal. It implies that the rest of the animal is allowed to go to waste", which, as she said, is considered "wanton waste" and is illegal. However, I came across an interesting article in the Blacktail News 3/12/2018, page 19, a publication of the Mendocino County Blacktail Association, highlighting Dwain "Bubba" Hunt and the "monstrous bear he killed this year". Did he eat the edible portions of this bear? Did anyone eat the edible portions of this bear? Not according to the article - the bear remains frozen at the taxidermist and, although "Bubba" is sad that he may never kill a bear this big again, "I'll keep trying". Ironically, the new Game Program Manager with the Wildlife Branch of CDFW, Brad Burkholder, is also featured in this issue.

But what is the mantra of bow hunters? Bow hunting is MUCH more challenging. It is the challenge and the thrill of pitting yourself against a large animal with a weapon that necessitates a close shot. And in contrast to rifle hunting, bow hunting is a "real sport" where the animal has an *even playing field*! To quote hunter David Lindahl on Quora, however, "Hunting with a bow is immoral if you have access to a rifle. The risks of wounding the prey in a non fatal way are magnitudes greater than with a rifle. You basically trade a risk of great suffering for the prey for a thrill of hunting inefficiently. It is disrespectful of the creature you intend to kill."

Bottom line - Let's ban bow hunting of black bears in California.

<https://www.google.com/search?q=www.huntingintheusa.com%2F rifle-hunting-vs-bow-hunting%2F&ie=utf-8&oe=utf-8&client=firefox-b-1>

www.bear-hunting.com/2014/5/middle-of-the-middle-redifining-shot-placement

[advanced black bear anatomy and shot placement guide no.8447](#)

http://www.mcbadeer.com/Blacktail_Deer_2018_Compressed.pdf

<https://www.quora.com/What-is-the-difference-between-bow-hunting-and-rifle-hunting>

December 21, 2018

President Eric Sklar,
Commissioners and Staff
California Fish and Game Commission
1419 Ninth St.
Sacramento, CA 95416

RECEIVED
CALIFORNIA
FISH AND GAME
COMMISSION
2019 JAN 15 PM 1:30

Dear President Sklar:

Thank you very much for your service. You have sacrificed much. I have a Bachelor's of Science degree, with a concentration in marine biology from California Polytechnic University, San Luis Obispo. I was also an abalone diver for several years.

With these two perspectives I will address the management of the organisms by the California Fish and Game Commission over the last several years. Those with the most to gain or lose and are closest to a situation tend to be the best ones to manage that situation. Commercial abalone and sea urchin divers are the very people who fit the above criteria. Members of the the California Fish and Game Commission are, in my opinion, too far away with little vested interest in the results of management.

In the 18th Century, an economist, wrote a book entitled, "an Inquiry into the Nature of the Wealth of Nations." In that book he described what happens to an area owned in a village by the entire community. The area was called the Commons in England. Most people in these villages raised sheep for wool and mutton. Sheep herders would bring their sheep to the Commons to graze. Because all sheep herders could bring their flock to the Commons soon the area was overgrazed and useless for grazing. Smith's proposed solution to this problem was private ownership of land. The owners could limit grazing so that overgrazing wouldn't occur.

The California Fish and Game Commission does not control or limit ranchers harvest their, cattle, sheep, goat, or poultry. Ranchers control the land and the animals. These people have a vested interest in maintaining their herds and flocks. No shortage of these animals exist even though people in California eat much more of these animals than fish.

I propose that the California Fish and Game Commission lobby the state legislature and Congress to survey the ocean, divide into lots, and sell the lots to the highest bidders. It would be up to the new owners to create "barbed wire," possibly electronic, to control the fish in their areas.

Thank you, very much.

Sincerely,
Gary L. Kirkland



Falconry Examination Study Guide.

chi ma

Wed 01/23/2019 02:05 PM

To: FGC <FGC@fgc.ca.gov>;

Hello Commission Members!

My name is Chi Ma, I'm a licensed general falconer. My concern today is about the Falconry Examination. There is no free study guide to study for the state mandated falconry exam. The trapping examination has a free study guide. I will provide a link below, but the falconry examination does not. My potential apprentices can not afford to spend extra money, for a study guide published by an organization that is not the state, on an already expensive endeavor. Is there any way that a study guide be made available at no cost to potential falconers? It is near impossible to pass a test when there is no idea about what subjects to study on. Previously I took the test and the subjects covered were way beyond what an apprentice/novice would need know to begin falconry. Luckily I have a background in biology to aid me in passing the test. For example: When we first apply for a driver's license we test for the basic rules of the road and how to operate a car to get a class C license. We are not required to know laws regarding riding a motorcycle or operating a commercial vehicle, because that is not the class we are attempting to achieve. The Falconry Exam however covers subjects that only a General or Master falconer would need to know. That is not the the class the apprentice is trying to achieve. The apprentice should be tested on the pertinent laws regarding falconry and the two birds, American Kestrel and Red-tail Hawk, they are allowed to possess. The rest of the knowledge will be imparted by their sponsor. Please look into this. I would hate for potential future falconry apprentices to be put off from being able to achieve their dream of becoming a falconer. I eagerly await or your reply.

Chi Ma

Link to trapping exam: [Trapping License](#)

Trapping License

The Department of Fish and Wildlife manages California's diverse fish, wildlife, and plant resources, and the ha...

FGC

Wed 01/23, 03:00 PM

chi ma

Hi Chi Ma,

Thank you for a great question, however it is the Department of Fish and Wildlife who administers both the trapping and falconry exams. The Commission establishes the regulations, but I don't think what you are asking requires that we change regulations.

I don't want you to be tossed from person to person so I have sent a request to the department to see who would be able to answer your question. As soon as I hear I will forward your email to them, and then let you know the person's name and contact information.

Sincerely,

Jon Snellstrom
Commission staff

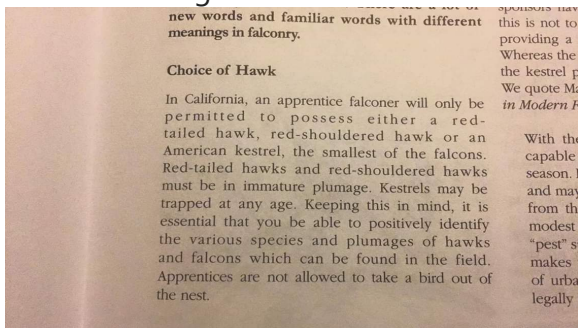
chi ma

Fri 01/25, 07:07 AM

Good morning Jon!

Thanks for your attention on this matter. I have known of several of potential falconers taking the test and failing because they used the only study guide available sold by a private party. These potential falconers never moved forward with falconry because of the cost of retaking the test and no source of correct information available to study from. I will include an excerpt from the falconry regulations and a picture of what is in the study guide that is available.

4. Possession of Raptors. An Apprentice falconer may possess for falconry purposes no more than one wild or captive-bred red-tailed hawk (*Buteo jamaicensis*) or American kestrel (*Falco sparverius*) at any one time, regardless of the number of state, tribal, or territorial falconry licenses in possession and only as long as the raptor in possession is trained in the pursuit of game and used in hunting.



So basically wrong information in the study guide is available causing people to fail and quit their quest for falconry. I believe the CDFW has an obligation to provide a free study guide so that people have a better chance to achieve their dream of being a falconer.

Once again I appreciate your prompt response and attention to this matter . 🙏

Chi Ma

From: David Willett <dwillett@santabarbarasearanch.com>
Sent: Saturday, December 1, 2018 2:58 PM
To: FGC
Cc: Ashcraft, Susan@FGC; Lovell, Randy@Wildlife; Ramey, Kirsten@Wildlife
Subject: Second Lease Application Addendum for Santa Barbara Sea Ranch
Attachments: Santa Barbara Sea Ranch Addendum B.pdf

Dear FGC,

Please find attached a second lease addendum to our lease application.

Thank you and best regards,

David

David T. Willett
President - Santa Barbara Sea Ranch, Inc.
Phone: (805) 450-9672
Email: dwillett@santabarbarasearanch.com
Website: www.santabarbarasearanch.com

Addendum B

State of California Fish and Game Commission Application for Lease of State Water Bottoms for Aquaculture

Applicant Name: Santa Barbara Sea Ranch, Inc.

Phone: (805) 450-9672

Address: 1829 Loma Street, Santa Barbara, CA 93103

Aquaculture Registration Number: TBD

Exp. Date: TBD

(Note: Aquaculture registration application will be made when appropriate)

Species of plant or animals to be cultured:

Mytilus galloprovincialis (Mediterranean mussels)

Crassostrea gigas (Pacific oysters)

Crassadoma gigantea (Purple-hinge rock scallops)

Santa Barbara Sea Ranch, Inc. (SBSR) is hereby requesting to add *Crassadoma gigantea* (Purple-hinge rock scallops) to the species to be cultured.

Rock scallop farming operations:

- Rock scallop seed (shell height ≤ 25 mm) will be obtained from: 1) CDFW-approved commercial hatchery stock, 2) seed that naturally sets on grow-out gear and/or collectors at the site and/or 3) naturally occurring seed collected from CDFW-approved sites. Small seed will be placed into stacked mesh culture bags (Fig. B1.1), containers with small holes or mesh, or shellfish grow-out trays lined with mesh (Fig. B1.2). The larger seed will be planted directly into shellfish grow-out trays (Fig. B1.3) where they will remain until they reach market size.
- After sufficient growth, the small scallops will be transferred to shellfish grow-out trays where they will be grown until they reach market size.
- As the scallops grow they will be periodically brought on deck, trays cleaned using pressurized seawater and market-sized scallops removed, washed, counted, and placed into bags for market. Undersized scallops will remain in the cleaned grow-out trays and returned to the sea for further growth.
- Once a crop is harvested, grow-out gear will be cleaned on deck with pressurized seawater, taken onshore and stored for reuse with the next crop.



Figure B1.1 – Example of Individual and Stacked Mesh Culture Bags

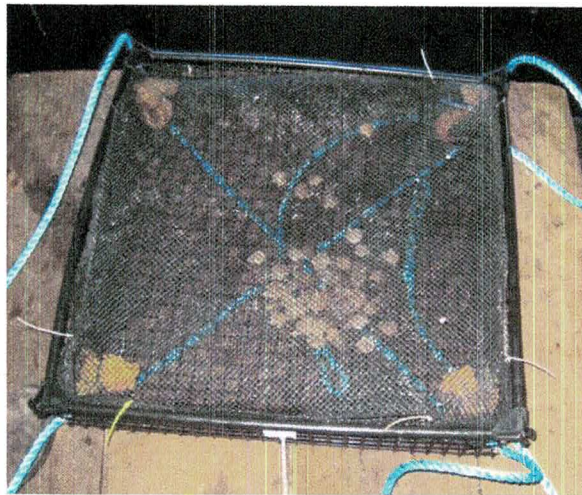


Figure B1.2 –Shellfish Grow-out Tray with Mesh Lining

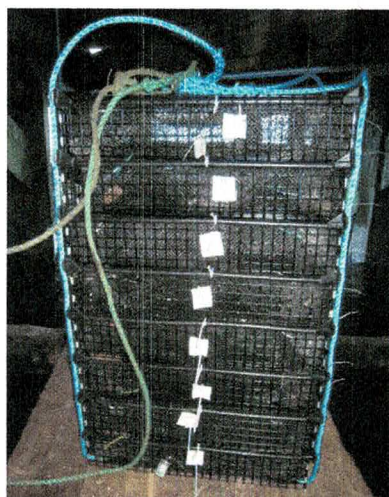


Figure B1.3 –Stack of Shellfish Grow-out Trays

Scallop Production schedule:

- Rock scallops grow rapidly in California, with deployed seed reaching heights of four to six inches in about two years.
- Although research is ongoing, each individual tray is expected to yield 50-75 market sized scallops, with trays stacked and deployed in groups. For experimental purposes, a stack of 8 trays has been used at a nearshore site that is shallower than the proposed SBSR site. Stacking in the open-ocean may vary.
- Given these numbers and accounting for 100 longlines in fully-optimized production, SBSR estimates annual production of approximately 500,000 scallops. Scallop production will be ramped-up and optimized in concert with production of the other species. The production ratio of the three species may vary depending on prevailing market and operational conditions.

Date: 12/1/18

Santa Barbara Sea Ranch, Inc.

By: 

David T. Willett – President & CEO

From: Jo Ann Ricci
Sent: Tuesday, January 8, 2019 7:32 AM
To: FGC
Subject: Mad River Fish Hatchery

The Mad River Fish Hatchery was saved by a group of local folks called the Friends of the Mad River Fish Hatchery. The company I worked for Green Diamond Resources also helped to reopen the hatchery with much needed maintenance. Many of us volunteered to help with various duties ie clipping fins etc.

Looking at the hatchery today I feel like all our efforts were for not. I looked in the fish ladder after the river came up to find ten steelhead. I looked for fisherman along the river and found maybe four or five. Long story short, a river that had thousands of steelhead returns and many happy fisherman is almost dead!

The hatchery has the capacity to raise millions of not only steelhead but also salmon with very little more effort and staff than is currently there now. Two partial race ways only are in operation the last few years. You should take a lesson from the hatcheries in Oregon and Washington. There are healthy returns on many of their rivers due to their hatcheries. .

I know your probably going to give me the same BS story about how the hatchery fish are crowding out the native steelhead. I have news for you! Before the hatchery was placed into operation (70's and 80's) no one fished for steelhead on Mad River. We had a healthy salmon run but very few if any steelhead. The hatchery was responsible for the increase in steelhead!

Get off your behinds and do something for our fishery on Mad River soon or it will go away! I challenge you to show some support for all of us who gave of our time and money to save the fishery. Just look at the stone monument by the office at the hatchery. I says a lot!!!

Thanks Rob Ricci

From: Jim Lambert
Sent: Tuesday, January 15, 2019 11:11 AM
To: Gordon Parker
Subject: Stripped Bass fishing On Carmel River

Schools of adult Striped Bass are reported in Carmel River; sighted spawning and producing young. Is this another perfect example of how California F&W have not protected the natural wild fish species in California Rivers; allowing this none native species Stripped Bass to spread and dominate the West Coast Rivers on this Continent.

JIM

Fish caught on Carmel River. Picture posted on Face Book; Jan.13,2019 by Central Coast Fly Fishing shop, 7164 Carmel valley road, Carmel valley, CA,

