

STAFF SUMMARY FOR DECEMBER 14-15, 2022

2. GENERAL PUBLIC COMMENT**Today's Item****Information** **Action**

Receive public comment regarding topics within FGC authority that are not included on the agenda.

Summary of Previous/Future Actions

- | | |
|--|---|
| <ul style="list-style-type: none"> • Today receive requests, petitions, and comments • Consider granting, denying, or referring | <p>Dec 14-15, 2022; San Diego</p> <p>Feb 8-9, 2023; Sacramento</p> |
|--|---|

Background

This item is to provide the public an opportunity to address FGC on topics not on the agenda. Staff may include written materials and comments received prior to the meeting as exhibits in the meeting binder (if received by the written comment deadline), or as supplemental comments at the meeting (if received by the supplemental comment deadline).

General public comments are categorized into two types: (1) requests for non-regulatory action and (2) informational-only comments. Under the Bagley-Keene Open Meeting Act, FGC cannot discuss or take action on any matter not included on the agenda, other than to schedule issues raised by the public for consideration at future meetings. Thus, non-regulatory requests generally follow a two-meeting cycle (receipt and direction); FGC will determine the outcome of the non-regulatory requests received at today's meeting at the next regularly-scheduled FGC meeting, following staff evaluation (currently Feb 8-9, 2023).

Significant Public Comments

1. New, non-regulatory requests are summarized in Exhibit 1, and the original requests are provided as exhibits 2 through 5.
2. Informational comments are provided as exhibits 6 through 18.

Recommendation

FGC staff: Consider whether to add any future agenda items to address issues that are raised during public comment.

Exhibits

1. [Summary of new non-regulatory requests received by Dec 1, 2022 at 5:00 p.m.](#)
2. [Email from Bernard Friedman, requesting to amend his state water bottom lease to allow for the harvest of California mussels and giant kelp, and to make these changes permanent rather than subject to regular renewal, received Sep 26, 2022](#)
3. [Email from Jeff Maassen requesting a permit renewal for the harvest of *Sargassum Horneri* and an additional harvest area, and transmitting associated documents and correspondence, received Oct 25, 2022](#)

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4. [Email from Doug Bush transmitting a request to renew a kelp bed lease, received Nov 3, 2022](#)
5. [Email from Phoebe Lenhart requesting that FGC coordinate a multi-agency effort to reduce cougar poisonings caused by rodenticides and add this issue to the WRC agenda, received Dec 1, 2022.](#)
6. [Email from Ace Carter recalling a fishing experience where a red algae bloom was encountered, received Oct 9, 2022](#)
7. [Email from Louis Gauci expressing opposition to bow hunting, received Oct 12, 2022](#)
8. [Email from Ken Bates, President, California Fishermen's Resiliency Association, sharing information about the organization's involvement in offshore wind project proposals in the Humboldt County area, providing policy documents, and offering to make a presentation to FGC, received Oct 19, 2022](#)
9. [Email from Gilbert Wirt expressing concern about low water levels at Littlerock Reservoir in Los Angeles County, received Oct 20, 2022](#)
10. [Email from Brad Mongeau stating that he was banned from the Bolsa Chica Interpretive Center after identifying unsafe conditions for the fish and lobster held there, received Oct 25, 2022](#)
11. [Email from Kim Hockman expressing opposition to bow hunting of bears and response to a specific incidence of a bear shot with an arrow, received Nov 1, 2022](#)
12. [Email from Patricia Lind expressing opposition to bow hunting as well as dissatisfaction with the handling of a bear injured by an arrow, received Nov 6, 2022](#)
13. [Email from Stanton Dumin expressing concerns about the current fishing regulations on the East Walker River and requesting a return to previous regulations, received Nov 7, 2022](#)
14. [Email from Larry Lewiston detailing a mountain lion encounter, received Nov 8, 2022](#)
15. [Email from Wayne Kotow transmitting an infographic about nationwide fishing participation data from 2021, received Nov 11, 2022](#)
16. [Email from Michael Wauschek expressing opposition to hunting, particularly bears, received Nov 13, 2022](#)
17. [Email from Daniel Childs inquiring about the differences between regulations concerning crab hoops and crab traps, received Nov 14, 2022](#)
18. [Email from Russell Walsh transmitting an article in East County Magazine about low water levels at Sweetwater and Loveland Reservoirs, received Nov 23, 2022](#)

Motion (N/A)

**CALIFORNIA FISH AND GAME COMMISSION
 RECEIPT LIST FOR NON-REGULATORY REQUESTS RECEIVED BY 5:00 PM ON
 DECEMBER 1, 2022 PUBLIC COMMENT DEADLINE FOR THIS MEETING**

Date Received	Name/Organization of Requestor	Subject of Request	Short Description	FGC Receipt Scheduled	FGC Action Scheduled
9/26/2022	Bernard Friedman	State Water Bottom Leases	Requests to add California mussels and giant kep to the species allowed for cultivation on state water bottom lease M-653-02, and for the addition to be permanent rather than routinely subject to renewal.	12/14-15/22	2/8-9/22
10/25/2022	Jeff Maassen	Harvest Permit Renewal	Requests to renew a permit to harvest <i>Sargassum horneri</i> , as well as add another harvest area within the existing permit.	12/14-15/22	2/8-9/22
11/3/2022	Doug Bush, Cultured Abalone Farm	Kelp Bed Leases	Requests to renew Kelp Bed Lease L-2724, pertaining to Kelp Bed L-26.	12/14-15/22	2/8-9/23
12/1/2022	Phoebe Lenhart	Rodenticide Poisonings	Requests that FGC coordinate a multi-agency effort to reduce cougar poisonings caused by rodenticides.	12/14-15/22	2/8-9/23

From: [REDACTED]
Sent: Monday, September 26, 2022 3:42 PM
To: FGC@fgc.ca.gov
Subject: fw: RE: Ammending lease M-653-02

Hello,

Please submit this email and it's attachments into the public record.

I've been trying to add California mussels and giant kelp to my list of species I can cultivate on my state water bottom lease M-653-02 since February of 2021.

I am asking the commission for oversight and advise on progress to get the lease amended.

I have been farming on this lease for the past 20 years and have permission from all of California's relevant regulatory agencies.

The California Coastal Commission has already amended the CDP to allow for cultivation of California mussels.

All operations are current and up to date on submissions of annual progress reports and mitigation measures. There is no change to this operation for the addition of these two species which have already been permitted on a conditional short-term basis.

The request I'm looking for is to permanently add these two species instead of regularly having to resubmit temporary permits.

I am happy to take questions and look forward to a solution.

Regards,

Bernard Friedman

Santa Barbara Mariculture Co.
Bernard Friedman

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: Tuesday, August 30, 2022 8:29 PM
To: "Briley, Sara [REDACTED]" "kirsten ramey"
<Kirsten.Ramey>
Cc: "Lovell, Randy [REDACTED]" "susan ashcraft"
<Susan.Ashcraft>
Subject: RE: Ammending lease M-653-02

Hi Sara,

After much delay I have a response to the comments you sent along last december.

The main delay was getting a quote for a ceqa document to help in getting the lease amended. the quote came in at a range of \$94,000 to \$130,000. The cost of this quote makes the request of amending the lease not feasible.

the quote does come with a menu of costs so that it may be affordable if a narrower request was called for.

In my attachment, my answers to your comments start on page 9. I do not feel a amendment to my CEQA document is warranted based on my answers. I am happy to discuss this further.

I also included the CEQA quote for your reference.

.My research group which is comprised of Holdfast aquaculture and USC researchers were just awarded a NOAA salt and Kennedy grant on a proposal to develop CA mussels for aquaculture that was submitted last year. The work is to begin in a month.

I would like to move forward with solutions to this dilemma so the grant money can be used for developing CA mussel culture in California.

I would like to submit any progress we make to the commission at the October meeting. I'm not going to throw anyone under the bus. The delays are all my fault. But I do need a solution and direction for what to do.

Regards, Bernard

Santa Barbara Mariculture Co.
Bernard Friedman

[Redacted]
[Redacted]
[Redacted]

Cover Letter

May 4, 2022

Mr. Bernard Friedman
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Santa Barbara Mariculture Co. Amending Lease M-653-02

Dear Mr. Bernard

Dudek is pleased to submit our outline of services necessary to prepare a Mitigated Negative Declaration (MND) pursuant to the California Environmental Quality Act (CEQA) in support of an Amendment to your existing lease with the California Fish and Game Commission (CFGF), specifically Lease M-653-02. We understand the intent of the lease amendment would be to include mussels and kelp at the current Santa Barbara Mariculture Co operations offshore of Santa Barbara, California.

We understand that we would be taking the materials provided to date including the applicant prepared draft Initial Study /Mitigated Negative Declaration (IS/MND), and include an assessment of impacts compared to the adopted IS/MND for the current operations. The outlined scope and estimated cost ranges herein assume Dudek undertaking all the work, however, we would be happy to discuss alternative sharing of work items as we recognize the costs are not inconsequential to your effort.

In addition, Dudek can help support application for an amendment to the operations Coastal Development permit to include kelp. For mussels, the California Coastal Commission (CCC) previously issued an immaterial approval of an amendment to the permit. For kelp, an additional amendment would be necessary, which ostensibly could again qualify as an immaterial amendment.

Dudek has been providing environmental evaluation support to aquaculture and other complex projects in the marine environment for over a decade. Our team offers the following strengths:

Unmatched Experience Preparing Legally Defensible Environmental Documents. Dudek has one of California's largest, most experienced teams for CEQA and National Environmental Policy Act (NEPA) document preparation. Our environmental planners have prepared and processed more than 2,800 CEQA/NEPA documents for a variety of large and small development, restoration, and conservation projects throughout the state. Combining comprehensive analysis and evidence-based findings, we provide legally defensible documents that are supported by substantial evidence, none of which have ever been successfully challenged. We conduct technically sound assessments and manage environmental review processes in a streamlined, compliant, and straightforward manner.

Diverse Capabilities. Our depth and breadth of experience means we can quickly assemble and mobilize the appropriate level of service to match your project needs and budget. Dudek's mid-sized, 600-plus-person team means we are small enough to provide customized services to meet the needs of our clients, while still offering the depth of experience needed to provide thorough, effective work products and strategic guidance. Our flat and

integrated organizational structure empowers project managers to seek input from our diverse group of seasoned professionals, and act decisively on our client's behalf, saving you time and money.

Qualified Staff. Our key Dudek team members include Project Manager Matt Valerio, Laurie Monarres and Carolyn Groves as permitting support, and John Davis IV as marine biology lead. These team members have key experience in aquaculture and/or permitting and environmental evaluation of projects and strong relationships with agency staff. For example, Laurie Monarres is a former U.S Army Corps. of Engineers (ACOE) Chief, and Carolyn Groves is a former California Coastal Commission (CCC) planner. John Davis IV has been integral to the development of best management practices and conservation measures for aquaculture projects. Matt Valerio has innovated permitting pathways and navigated the CEQA and NEPA process for large projects, including numerous projects for the ports of San Diego and Los Angeles, desalination projects, and a joint environmental impact statement (EIS)/EIR for the Coastal Storm Damage Reduction Project along the Southern California coast on behalf ACOE. Our team members provide various roles in support of the ongoing Ventura Shellfish Enterprise permitting processes for the Ventura Port District as well as the offshore fin fish Pacific Ocean Aquafarms Project permitting with the National Oceanic and Atmospheric Administration (NOAA

Sincerely,



Matt Valerio
Principal



Joseph Monaco
President and CEO

Joseph Monaco is authorized to sign on behalf of Dudek.

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Scope of Work and Cost Summary

Review of IS/MND and related materials, MND preparation, CDP Amendment support:

Task	Scope Summary	Cost Range
<p>CFGC – State Waters Bottom Lease Amendment, CEQA</p>	<ul style="list-style-type: none"> • Evolve the applicant prepared IS/MND into a Comprehensive IS/MND adequate pursuant to CEQA: <ul style="list-style-type: none"> ○ Confirm and refine project description to be comprehensive of all construction and operation activities including landside transport/operations [assume NO landside/shore improvements necessary for the project, only some transport details to be added] ○ Addition of Mandatory Findings of Significance including cumulative analysis, collaborating with CFGC to determine the list of cumulative projects ○ Independent analysis and improved processing of available technical material, including water quality [assumes no additional survey work is required] including whether/what mitigation may be necessary ○ Analysis of available fishing data including whether/what mitigation may be necessary ○ Marine Biology Survey and Biological Technical Report ○ Additional Marine Biology (Biological Assessment and EFH) ○ Undertake calculations for AQ, GHG and energy ○ Further analysis of cultural resources by reviewing California State Lands Commission California Shipwreck Database, and National Oceanic and Atmospheric Administration Shipwrecks and Obstructions database [assume CFGC has conducted Tribal Consultation and can provide summary, if necessary] 	<ul style="list-style-type: none"> • \$81,900 - \$114,000 <ul style="list-style-type: none"> ○ \$1,200 - \$2,000 ○ \$3,000 - \$5,000 ○ \$8,000 - \$10,000 ○ \$2,000 - \$4,000 ○ \$15,000 - \$20,000 ○ \$15,000 - \$20,000 ○ \$8,000 - \$10,000 ○ \$4,000 - \$6,000

Task	Scope Summary	Cost Range
	<ul style="list-style-type: none"> ○ Analysis of consistency with the California Coastal Act and note the CCC’s guidance on Aquaculture permitting [1] ○ Independent review of all IS responses and additional narration as necessary [assumes no new tehcnical reports or modelling necessary] ● Provision of 1 screencheck Draft IS/MND for CFGC, CDFW and responsible agencies (CCC et al) review ● Revisions based on agencies review and provision of Public Review Draft IS/MND [assumes no additional substantive analysis or surveying necessary] ● Preparation of Notice of Intent (NOI) to adopt an MND, [1 round of review by CFGC assumed], and distribution of NOI [assuming CDFG would file with OCunty clerk andaddrss review fees] for 30-day public review ● Create a refined Mitigation Monitoring and Reporting Program (MMRP) ● Collection of public comments recieved, organization and stratization of responses ● Preparation of written responses to comments for upto 50 unique comments [assumes no new anlaysis required and use of common/master responses to the maximum extent possible] ● Revisions to IS/MND as needed and provision to CFGC and responsible agencies 1 screencheck Final IS/MND including RTCs 	<ul style="list-style-type: none"> ○ \$1,500 - \$2,000 ○ \$4,000 - \$6,000 ● [culmination of items “○” bulleted above] ● \$8,000 - \$10,000 ● \$2,000 - \$3,000 ● \$2,000 - \$3,000 ● \$1,200 - \$2,000 ● \$4,000 - \$6,000 ● \$3,000 - \$5,000
CCC CDP Amendment	<ul style="list-style-type: none"> ● CCA consistency will be included in the IS/MND land/water use anlaysis; however, additional rigor is required for the CDP Amendment application to the CCC. Dudek has former CCC staff that can undertake the necessary review and prepare the CDP Amendment application IF the applicant has 	\$5,000-\$15,000

¹ https://documents.coastal.ca.gov/assets/cdp/CDP%20Application%20Guidance_12.08.20.pdf

Task	Scope Summary	Cost Range
	<p>not. Or Dudek can review and revise any application packet prepared by the applicant to promote it's comprehension and acceptance by CCC for review.</p> <ul style="list-style-type: none"> • Dudek can provide responses and revisions to materials to addresss CCC feedback [assume 2 rounds of CCC review and comments prior to accepting application] • Dudek can review CCC staff report, including conditions of approval and findings, and recommended repsonses thereto • Dudek can support the applicant in preparing for and attending the CCC hearing for the CDP Amendment, [assume applicant would make any presentation at the hearing] 	
Project Management	<ul style="list-style-type: none"> • Management of Dudek efforts and project progress, inclusive of all efforts identified herein as well as meetings, schedule, budget and invoicing, and coordination 	\$ = ~10% of fee outlined above (\$8,000-\$14,000)
Total assuming all tasks above:		\$94,900 - \$130,400

Amendment to State Water Bottom Lease M-653-02 to include the giant kelp (*Macrocystis pyrifera*) and the California mussel (*Mytilus californianus*) as species of cultivation.

Sept. 14, 2021

Introduction

This amendment request is to add two species as stated above to the list of cultivated species on Lease M-653-02. State water bottom lease M-653-02 was executed for a duration of 15 years on May 21, 2018 between Santa Barbara Mariculture Company (SBMC) and the Fish and Game Commission for the cultivation of Pacific oysters (*Crassostrea gigas*) and Mediterranean mussels (*Mytilus galloprovincialis*). Santa Barbara Mariculture Company was granted additional authorization for regulatory compliance for legal operation of lease M-653-02. These additional authorizations include a Coastal Development Permit (E-12-012-A1), a Water Quality Certification (34218WQ41), and a Department of Army Permit (SPL-2018-00684-TS) to run concurrent with the 15-year lease. In addition, SBMC holds annual permits with the California Department of Public Health which include a Shellfish Growing Area Certificate (SGA21-614-AQ) and a Shellfish Handling and Marketing Certificate (CA 614 SS).

Santa Barbara Mariculture Company submits yearly logs, reports, site inspections, audits, and payments to stay in compliance. Although the recent authorizations were granted in 2018, SBMC has been successfully operating and growing shellfish on lease M-653-02 since 2002. The history of operations and the detailed specifics of the operation can be found in the CEQA document Titled: SANTA BARBARA MARICULTURE COMPANY CONTINUED SHELLFISH AQUACULTURE OPERATIONS ON STATE WATER BOTTOM LEASE OFFSHORE SANTA BARBARA, CALIFORNIA, publish January 2018 by the Department of Fish and Game.

This amendment borrows heavily on present operations and authorizations. The structure, the operations, and the compliance requirements have all been authorized and meet California regulatory standards. This amendment is specifically a description of how giant kelp and California mussels will be utilized in the already pre-existing and authorized operation.

The California Mussel

The California mussel is a native of the North American West coast. They were an important source of food for Native Americans prior to European contact. Mussel populations are often found in large aggregations on rocks in the upper intertidal zone. The purpose for growing the California mussel at lease M-653-02 is to promote this delicacy as a sustainable source of food. The California mussel makes an excellent candidate to diversify SBMC's crop tool kit and

provide sustainability in the face of climate change and extreme variability in environmental conditions.

The proposed plan for growing the California mussels is identical to the description of the cultivation of Mediterranean mussels which is currently approved.

Mussel Farming Operations

The mussel culture begins by hanging 10-foot fuzzy ropes on the backbone. The fuzzy ropes are obtained from a shellfish hatchery and already have settled mussels on them. Each rope can carry as many as 50,000 mussels, which are referred to as “spat” once they are permanently attached to a surface. The spat were produced from native broodstock at a land based facility. After 3 months, the mussel spat have grown to 0.25-inch in size; the seed ropes are stripped and the mussels are placed into a machine that re-distributes them onto another continuous mussel rope using a biodegradable net sock to hold them in place until the mussels attach themselves to this fuzzy rope. The mussel rope is tied and draped below the backbone in 10-foot loops spaced 3-feet apart (diagram 1). About 2,000 feet of fuzzy rope is tied to one longline. At harvest time, the end of the mussel rope is untied from the backbone and inserted into a ship-board harvesting machine run by the boat’s hydraulic system. The machine strips the rope of its mussels and rotates them through spinning brushes to break the mussels apart and clean them of any fouling. The most common fouling on mussels is filamentous algae and barnacles, which is washed by seawater and returned to the ocean from whence it came. Washing mussels during harvesting is recommended by the National Shellfish Sanitation Program (FDA, National Shellfish Sanitation Program, 2013). After passing through the machine, the mussels are transferred into a barrel of seawater before being placed onto a sorting table. The market-size mussels are rinsed and placed into 25-pound bags and stored in barrels of seawater for transport back to landing, and undersized mussels collected for reattachment to ropes for continued grow-out.

Giant kelp

Giant kelp is a large brown algae native to the California marine environment. Individuals may grow to 150 feet with growth rates as much as 2 feet a day. Giant kelp can commonly be found on rocky bottoms in depths between 15 to 40 feet and form floating canopies which are commonly called kelp forests.

The purpose for growing giant kelp on lease M-653-02 is to diversify Santa Barbara Mariculture’s farm portfolio. Traditional uses for giant kelp have been for the extraction of alginates which are used as a thickening agent in common products ranging from ice cream to cosmetics. Other potential products are as an ingredient for livestock feed to reduce methane emissions, fertilizer, biofuel, carbon credits, and renewable and biodegradable plastic polymers.

Giant kelp grown on the lease may also one day be used to restore habitats devastated by climate change.

Giant kelp is currently being farmed on the lease under multiple temporary permits. They include two Scientific Collection Permits (S-183050002-18305-001 and S-200500001-20050-001) and an Amendment to a Coastal Development Permit (E-12-012-A4). The methods to grow the kelp have been extensively described in those permits and will be reviewed again in this document.

Giant Kelp Farming Operations.

The giant kelp germlings are produced from native brood-stock in a land-based facility. These germlings can be attached to a ½ inch nylon rope with biodegradable glue or settled naturally. The grow rope is 15 foot long and is directly tied to the main line and floated with a bullet float to suspend it above the mainline (see diagram 2). This grow rope may have as many as 15,000 germlings which are microscopic in size at the time of planting. Giant kelp seeds compete between each other for nutrients and access to light, which results in self – thinning, where some of the germlings might die off or stay at the microscopic stage until conditions for growth are met. A well seeded line would have between 1 and 2 attached adult plants per foot. Full grow-out of the seed rope is expected to occur in 6 to 12 months when the plants are reaching the surface. For harvesting and inspections, the longline is brought to the surface using the boats winches. The kelp will be harvest by hand either by cutting sections and letting the plant regrow or untying the seed line and dragging all the plants growing on the seed line into the boat.

Another method for growing the kelp is to soak a 1 to 4 mm nylon twine large containers filled with planktonic germlings. Nursery time can take 30 to 45 days and then the line is unfurled along the main line and fastened at 3-foot intervals to the mainline. The kelp is allowed to grow up to the surface and is periodically inspected for growth (see diagram 1). At 6 to 12 months of growth or when the plants have reached the surface, the longline will be raised using the boats winches and the giant kelp will be harvested by hand by either cutting sections of the plant and letting the plant regrow or cutting the plant at the stipe and dragging the whole plant into the boat.

An offshoot of this method, and this will be mostly for science, is to settle kelp germlings on short (2.5 inch) pieces of twine that will be attached to a ¼ nylon rope at 2 foot intervals which is fastened to the mainline at 2-foot intervals.

The backbone depth for the kelp and the mussel lines will be maintained at depths between 20 and 50 feet and will have a series of surface floats keeping the line at a set depth and in addition the kelp lines will have 50 lb. concrete weights attached to the mainline below the surface floats to maintain sufficient ballast during grow-out (See diagram 1 and 2).

Diagram 1: Schematic of mussel, kelp, and oyster longlines. Longline configuration is the same for all three species.

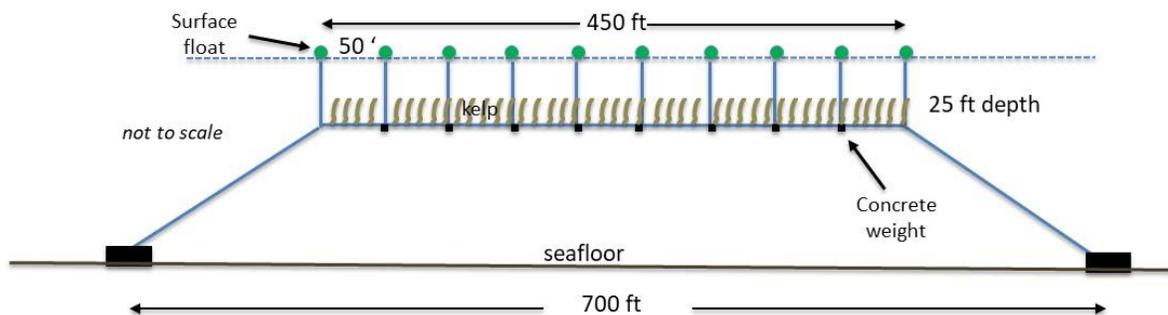
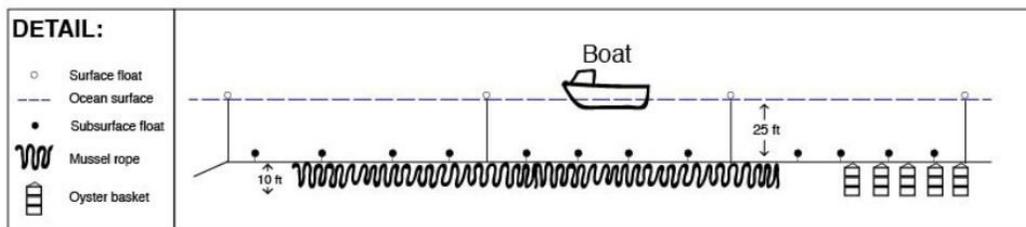
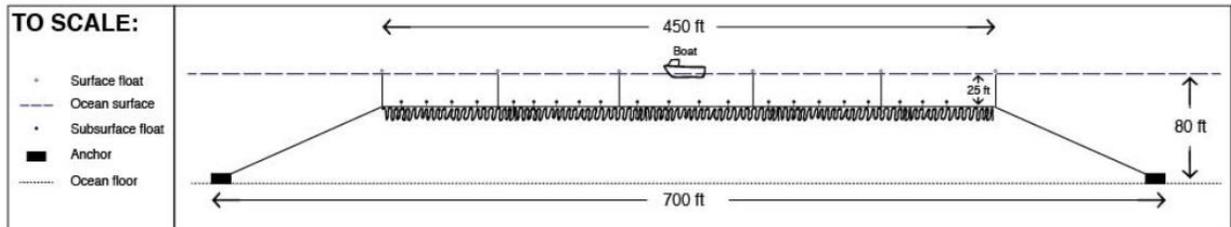
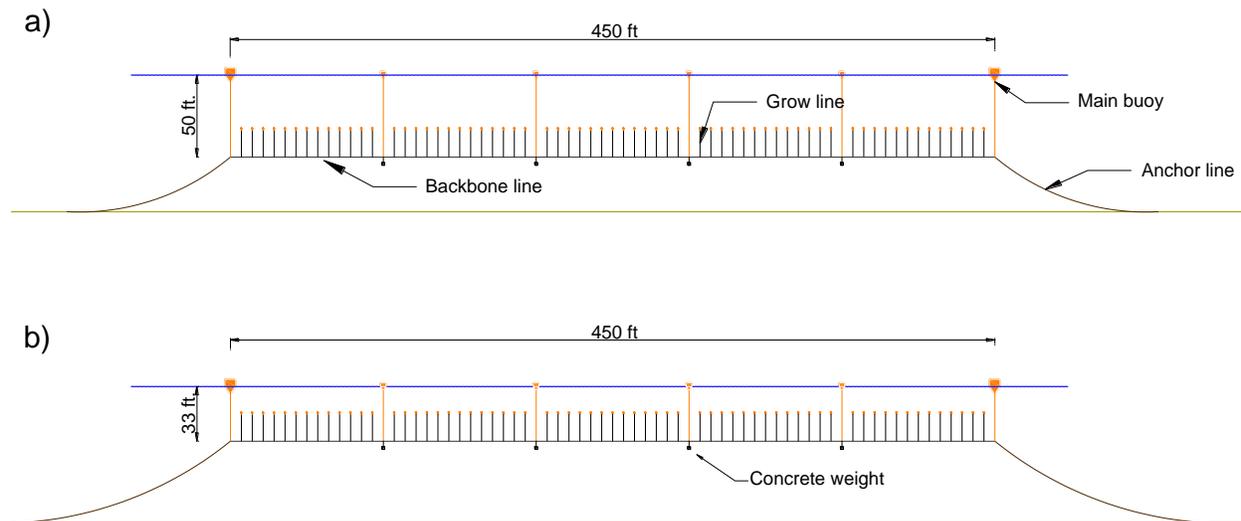


Diagram 2: Kelp seed lines attached to the mainline shown in two different depth configurations



Environmental Checklist

Aesthetics: The proposed project will not result in a long term impact to aesthetic resources. The farm structures have been approved by the CCC (CDP E-12-012-A1) and reviewed in the Initial Study Santa Barbara Mariculture CEQA document.

Agricultural Resources: There are no agricultural resources in the project location.

Air Quality: There are no significant impacts to air quality from the proposed project as determined by the mitigated negative declaration in the SBMC CEQA document.

Biological Resources: Refer to CDP E-12-012-A1 and BIO -1 through BIO-7 in CEQA document

Tribal Cultural Resources: The proposed project is located on a sandy ocean floor and there would be no earthwork or land disturbance. There is no impact to cultural resources as reviewed in CDP E-12-012-A1.

Geology and Soils: There is no land disturbance for the proposed project and there will be no impact to geological resources as reviewed in CDP E-12-012-A1.

Greenhouse gas Emissions: Refer to CEQA document.

Hazards and Hazardous Materials: The project as conditioned in the approved CDP E-12-012-A1.

Hydrology/Water Quality: The proposed project will not change or alter hydrology and would not impact water quality as approved by the Central Coast Regional Water Board and reviewed in CDP E-12-012-A1.

Land Use: No impacts.

Mineral Resources: No impacts

Noise: There would be no impacts from noise as reviewed in the CEQA document and CDP E-12-012-A1.

Population and Housing: There would be no impact to population and housing from the proposed project.

Public Services: The proposed project would not increase the need for public services.

Recreation: The proposed project does not impact recreation areas as reviewed in CDP E-12-012-A1.

Transportation/ Traffic: There would not be an increase of traffic or the need for parking from the proposed project.

Utilities: The proposed project does not impact utilities and there will be no impact.

Mandatory finding of Significance: Refer to CDP E-12-012-A1 and CEQA document.

Project Description:

More details are needed in the description. Highlight what would be new compared to what was already included in the 2018 IS/MND project description. Some information may seem obvious to you but would be helpful to state explicitly for other readers. For example, some details to consider adding:

1. CA mussel:

- Are there any differences between culturing the CA mussel compared to the previous description of culturing Mediterranean mussels?
- Will total production of mussels increase on the lease with the cultivation of this new species, or will mussel production remain the same but with Mediterranean mussels making up less of the total production amount?
- Will there be more lines devoted to mussel aquaculture now or no change from the IS/MND? How many lines will be used for mussel cultivation?

2. Kelp:

- What is the estimated amount of kelp produced on the lease?
- How many lines on the lease will be the modified kelp longline?
- How will maintenance of the kelp lines differ from maintenance of the mussel lines – is there a difference in timing and frequency of maintenance/harvest from the mussel culture?
- Will kelp culture activities result in additional boat trips to the site than described in the IS/MND?
- Why is there a wide range in potential depths for the kelp longlines (20-50 ft depth)? How is the depth selected?

Environmental Review:

1. Important to highlight how the impact of this revised project compares to the impact of the original project described in the adopted IS/MND. Are there any new significant environmental effects or increases in the severity of previously identified significant effects? If so, can they be reduced through mitigation?

2. Each issue on the checklist (e.g., aesthetics, biological resources) has a series of questions that each need to be addressed in your explanation. For example, there are 6 questions under biological resources to address.

3. In your explanations, the arguments must be included in this document and not just referenced to other documents. Mentioning that there are no impacts as determined by the previous IS/MND or CDPs is not enough information. Put the conclusions of the analysis from these documents into your own words prior to citing them.

4. Citing the previous IS/MND alone may not be adequate in all cases since the IS/MND did not include analysis of new project components (kelp or CA mussel aquaculture activities). That previous analysis serves as a good starting point, but then your analysis should evaluate whether there would be any differences in impacts caused by the new project scope compared to the original project. We discussed a few that might be new: culturing native species may pose some risks to wild population's genetic diversity and disease exposure. You might also consider whether there would be new or increased impacts if there are additional lines installed, modifications to the longline structures, or increased volume of bivalves.

I apologize for the long delay. It was suggested during one of our conversations last year that hiring an environmental consultant would be prudent to modify the current CEQA document to include the addition of these two new species for cultivation on the lease. I contacted 3 environmental consultants and received 1 quote 6 months later. You can find the quote added in a separate attachment. The estimated cost range for amending the current IS/MND is projected to be between \$94,000 to \$130,000.

The two species that I am trying to cultivate on the lease have low to little commercial value at this time. The interest in these two species is driven by government grants to develop these two species into commercial aquaculture production. The expense of an amended IS/MND is inappropriate for the application of these government funds. Further, the cost is inappropriate to this application because the two species do not change the operation of the farm that isn't already stated in the current IS/MND and no additional mitigation measures would be needed to cover the cultivation of these two species.

The estimate that is listed below does list a menu of items that could be specifically addressed to cover the concerns of CDFW. Further clarification is needed in CDFW's feedback response to make this amendment feasible. I cannot bear the full cost of amending my IS/MND to include these two species for cultivation. I am a family farm making a living on California's resources. The cost of doing business in this state is extremely high. Please mitigate these costly burdens so I can continue to provide for my family.

I would now like to respond to your feedback so that we may work together to make a request that is both feasible and comprehensive.

1. CA Mussel:

- a. There are no differences between culturing the CA mussel and the Mediterranean mussel. The description in the IS/MND is the same. The mussels are spawned in a hatchery. They set on a rope which is hung out on the farm which is redistributed on to more rope. The mussels are grown the same way and harvested the same way. A mussel is a mussel in this instance.
- b. The total production of mussels will not increase. The farm is approved to grow up to 360,000 lbs. a year as stated in the IS/MND. Maximum capacity for the farm is 320,000 lbs. if only mussels were to be grown on the farm. As stated in the IS/MND the farm can also grow up to 250,000 oysters but the ratio between mussels and oysters will vary from year to year. The same is true for CA mussels. The maximum of each species will not be exceeded in a given year nor can the farm grow a maximum for both species in a year. This allows flexibility in planting and farm management and allows for a suite of options for the farmer.
- c. As stated in the IS/MND and in the previous answer. There is no designation of longlines for a given species. Planting and growing designations are dependent on availability of seed and availability of lines that have been harvested and are ready for planting. Due to the variability of biology and environmental conditions, planting ratios of any shellfish species is hard to predict.

No new lines will be added as part of this request. The IS/MND permitted a total of 40 longlines to be installed on the farm. A total of 32 longlines exist on the farm with no more room to add more.

2. Kelp:

- a. The estimated amount of kelp produced on the lease would be 320,000 lbs. a year. This is a maximum amount assuming that kelp is grown on all 32 longlines.
- b. Due to the unpredictability of the environment, it is impossible to predict what ration of kelp, mussels, and oysters will exist on the farm. The longline is not modified for any of the three species. It is the same throughout the entire farm and can be used to grow all three species.
- c. The maintenance for the kelp lines and the mussel lines are the same. They are the same lines that can be used to grow either oysters, mussels, or kelp. The boat uses the same procedure for handling, maintaining, growing, and fixing. All 32 longlines are exactly the same.
- d. The current IS/MND permits two boats to visit the farm every day of the week. No additional boat visits are required for this amendment since there is no addition of any longlines just a request to add variety of species to cultivate.
- e. The range of depth requested for the kelp longlines is the same range of depth used to cultivate the shellfish. Mussels are hung below 50 feet to avoid duck predation. When the ducks are not around the mussel lines are raised to 20 feet to increase growth rates. Oyster nets are hung deep to avoid fouling at certain times and raised to boost growth. The same management practices will be applied to kelp to minimize environmental interactions and promote productivity.

Environmental Review:

1. The environmental impact will be much less than currently stated in the IS/MND. There are currently less longlines and less shellfish produced than allowed for in the current IS/MND. The subsequent annual reports submitted to your agency detail no impacts on the farm. One was just submitted in May of 2022. These reviews were submitted annually since 2019 during years where the farm was growing kelp under temporary permits. There have been no documented environmental effects as to be documented as required by the IS/MND and coastal development permits.

It is currently documented in these annual reports that no significant environmental changes have occurred over the past 20 years that this farm has been in existence. Since there is no change to the operation, no environmental effects are predicted to occur.

2. I don't have the original questions of the checklist anymore and would need a refresher on where to find them again. I believe that since there is no change to the operation, the current IS/MND and the CDP amendments answers those questions. Furthermore, the mitigation measures implemented are sufficient to monitor any environmental changes occurring by adding these two species.
3. I hope the above answers provided more context. The current IS/MND does not need to be rewritten and would be a burdensome reiteration of already previously stated facts.
4. There is no modification of longlines or increase in activity due to the addition of these species. The project stays the same just different species are grown.

The regulation and mitigation to exposure to disease and genetic diversity fall under CDFW existing regulation. I file import permits and consult with CDFW's Shellfish Health Laboratory and Fisheries Genetics Laboratory for any planting of shellfish on the farm. These two species fall under the same regulatory umbrella and are currently being evaluated by your department. Broodstock for the kelp is selected from nearby kelp beds and Ca mussels are selected from natural settlement on the longlines.

5. Nothing was added on the farm for the cultivation of these two new species requested. The amended CDP's should be sufficient since they do not increase any activity or equipment already permitted at the farm. California Coastal Commission staff have asked that the species be permanently put on the lease rather than have to continually resubmit a temporary permit. No adverse effects have been documented after 4 years of cultivation of kelp. How much more and what kind of analysis is needed.
6. Formatting is burdensome and costly for a family farm that is doing research on government funds. Please spend our tax dollars more wisely.

From: Jeff Maassen [REDACTED]

Sent: Tuesday, October 25, 2022 9:24 PM

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

Cc: Elsmore, Kristen [REDACTED] Sergey Nuzhdin

Subject: Invasive harvest permit renewal (Sargassum Horneri)

Dear Commissioners and Melissa Miller Henson,

I am writing to renew my permit to harvest the invasive kelp Sargassum Horneri that you issued to me earlier this year as per Conditions Letter dated 1-20-2022.

I would also like to also ask your consideration to include another Sargassum h. harvest area within my existing permit to facilitate a Macrocystis Kelp restoration project in development that is a collaboration with USC (University of Southern California) at Catalina Island. (Map and coordinates attached....proposal coming soon!)

Please see attached request with background information, support letter from USC and Conditions Letter.

Thank you very much,

Lance Maassen (aka Jeff)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Lance Maassen (aka- Jeff)

To: California Fish and Game Commission

Re: Commercial Kelp harvest conditions for invasive Sargassum Horneri.

Dear Commissioners,

I am writing to request an annual permit extension (with some modifications) of my annual conditional Kelp harvesting license for the invasive Sargassum horneri that I was issued January 20 2022.

This year, the Sargassum was not as severe as preceding years and I was not inclined to complete a harvest due to market unavailability and cost of harvest constraints. After acquiring my permit in January- it became evident that the densities and volume would not be there as in the preceding several years. In my market research subsequent to receiving my conditional permit I have contacted universities, "Urchinomics", farms (chicken, pig and marijuana) NGOs and other entities that are interested in experimenting in utilizing it. It appears that there is limited initial interest as all would like to try a sample and test out and assess if could be utilized on a broader scale. Should the Sargassum continue to be a persistent problem in the future - even with density ebbs and flows- I believe that my preliminary groundwork will serve to be useful in both scaled removals utilizing Sea Urchin divers and hopefully utilization of as a food, feed or fertilizer.

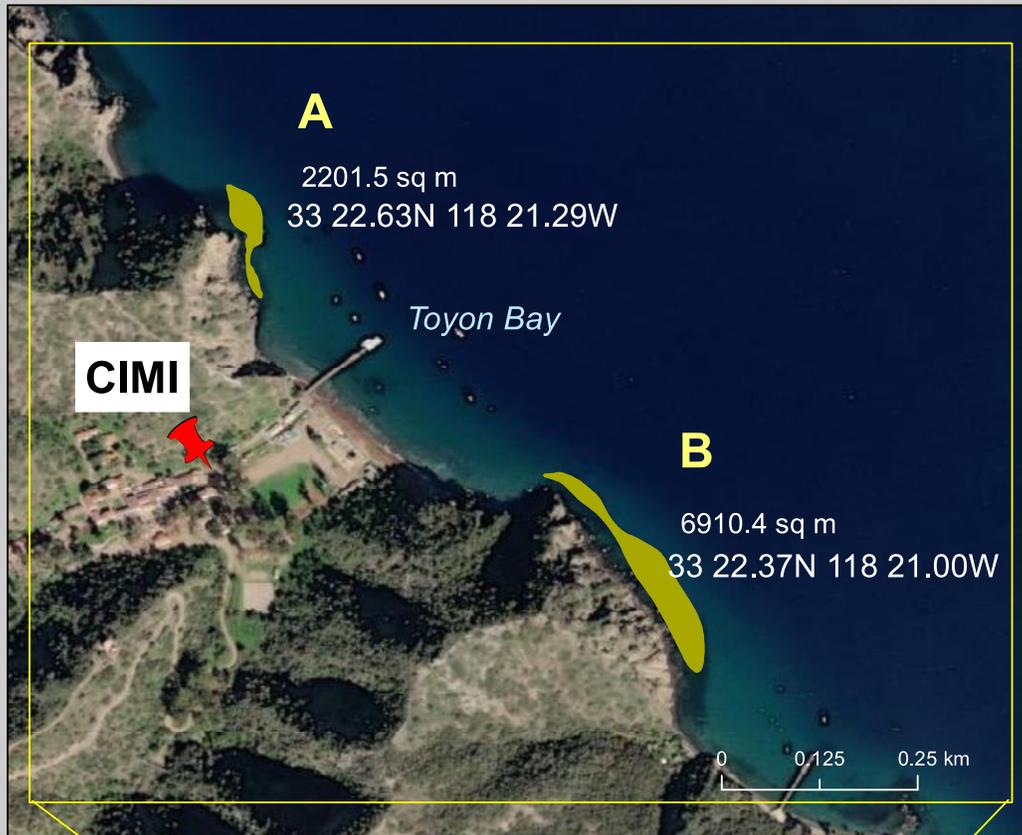
Within the context of Sargassum removals and research on Kelp Forest ecosystem regeneration- I wanted to inform you that I am collaborating on an upcoming project proposal with the Dr Sergey Nuzhdin lab at the USC Dornsife school (University of Southern California) to provide Sargassum removal services at the CIMI camp, Toyon bay at Catalina Island (Two coves up from Avalon). This exciting project could stimulate and perhaps incorporate camp students to inspire, collaborate and as well as provide easy accessibility by CDF&W personnel and other interested parties to come visit and monitor efficacy and progress in restoring the Kelp forest at that site.

In Summary; It is my hope that you will renew my conditional Sargassum permit for another year. Attached, please find the proposed Catalina Island restoration site at Toyon Bay.

Best Regards,

Lance Maassen

Appendix 1. Locations for Kelp Beds Restoration Project.



Legend

- BIO_CA_Kelp_2013
- Area_of_Interest
- NOAA_MPAI_Catalina



To Jeff Maassen,

10/23/2022

Dear Jeff,

This letter is to express my strong support to your application for the sargassum commercial harvest renewal and extending your permit to the Catalina Island area.

As you know, Catalina shore is overtaken by sargassum, and we plan on efforts to restore native kelp beds, with hopeful funding by Builders Foundation. Prior to enhancing kelp recruitment, we need to make sure that sargassum is not overabundant in restoration area, else kelps will be shaded and not efficiently recruited.

Collaborating with you is the most sure way of accomplishing this goal.

Yours





State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Marine Region
32330 N. Harbor Dr.
Fort Bragg, CA 95437
[REDACTED]

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



January 20, 2022

Mr. Lance Maassen
[REDACTED]

Subject: Conditions for Commercial Kelp Harvesting License

Dear Mr. Maassen:

Please find attached the Condition Letter to allow commercial harvest of *Sargassum horneri*. This condition letter must be attached to your Commercial Kelp Harvesting License and must be shown upon request to any person authorized to enforce California Fish and Wildlife regulations. This condition letter does not relieve the holder of the responsibility to obtain any other required permits, or comply with any other Federal, State, or local laws and regulations.

If you have any questions or need further information, please contact me at
[REDACTED]

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Elsmore".

Kristen Elsmore, Environmental Scientist
Nearshore and Bay Management Project
Department of Fish and Wildlife

January 20, 2022

Subject: Conditions for Commercial Kelp Harvesting License

Authority: This license is issued by the California Department of Fish and Wildlife (Department) pursuant to California Fish and Game Code Sections 6650-6653, 6656, 6680, and 15202, and California Code of Regulations (CCR), Title 14, Section 165, and serves as authorization to collect and transport the marine alga species approved for commercial purposes.

Project Manager:

Name: Mr. Lance Maassen



Authorized Collector:

Name: Mr. Lance Maassen



Effective Date and Expiration Date:

This authorization shall be valid from **01/20/2022** through **12/31/2022**, or earlier if collection of approved species has ceased (e.g., due to emergence of *S. horneri* reproductive structures) or the take limit per trip of the approved species is reached, whichever is earlier.

Collection Location(s):

The vegetative tissue of the approved marine alga species may be collected within two nautical miles of Arch Rock (N 34°01.001, W 119°21.318) (Anacapa Island) from depths of approximately 20-30 feet and within two nautical miles of Brockway Point (N 34°01.743, W 120°08.674) (Santa Rosa Island) from depths of approximately 15-25 feet, with the approved ports of landing being Oxnard and Santa Barbara, respectively.

Authorized Species:

This authorization covers *Sargassum horneri*.

Conditions of Authorization:

The Department's issuance of this condition letter is subject to the Project Manager's compliance with and implementation of the following conditions of authorization:

- 1) This condition letter authorizes the collection of up to 1,500 pounds wet weight of *S. horneri* from a single approved harvest location per trip (Table 1).
- 2) Approved locations of harvest, depths, and ports of landing include:

Table 1. List of approved harvest locations and corresponding landing ports for the harvest of <i>S. horneri</i> .				
Harvest Location	Latitude, Longitude	Harvest Vicinity Radius	Harvest Depth Range	Landing Port
Arch Rock, Anacapa Island	N 34°01.001, W 119°21.318	within two nautical miles of coordinates	20-30 feet	Oxnard
Brockway Point, Santa Rosa Island	N 34°01.743, W 120°08.674	within two nautical miles of coordinates	15-25 feet	Santa Barbara

- 3) Only non-reproductive *S. horneri* may be harvested as determined by visual inspection for the absence of reproductive receptacles. Department-approved materials for the identification of reproductive receptacles are provided with this condition letter.
- 4) *S. horneri* may only be harvested by hand, or with hand tools such as dive knives, scissors, or clippers, and placed in sealed non-permeable bags underwater at the point of harvest, before being transferred to a vessel.
- 5) To reduce take of incidental species, epibionts (organisms living on or among *S. horneri*), and other species should be removed from *S. horneri* prior to placement in sealed non-permeable bags and care should be taken to not remove or disturb native species while harvesting.
- 6) All Commercial Kelp Harvesting License, harvesting and reporting provisions in CCR, Title 14, Section 165 apply.
- 7) To limit potential for dispersal, *S. horneri* may not be transported greater than 500 feet underwater from the point of harvest to the vessel.
- 8) On the vessel, bags of harvested *S. horneri* must be placed within additional containment, such as fish totes, other similar hard-sided containers, or heavy duty brailer bags to limit distribution on the deck and reduce accidental spillage of *S. horneri* while transferring from the boat to the dockside. The secondary containers, such as fish totes or brailer bags may only be washed out at upland sites or into municipal wastewater systems where appropriate.
- 9) Any debris from harvesting activity must be washed from the deck or fish hold before leaving the harvest location. Fish holds shall not be openly connected to surrounding seawater while transporting *S. horneri*. Fish holds used to transport *S. horneri* must be sterilized with a 10% bleach solution before reconnection to seawater.
- 10) To reduce the risk of spreading to new locations, *S. horneri* may only be harvested and possessed at approved harvest and landing locations and direct routes in between, as defined by the Department.
- 11) To reduce the risk of spreading to new locations during land-based transit, *S. horneri* must remain in sealed non-permeable bags throughout transport from landing locations to approved recipient locations adjacent to or connected with State waters (e.g., aquaria) (Table 2).

Table 2. List of facilities approved by the Department to receive, hold, and dispose of *S. horneri* transferred from the Project Manager (only includes facilities adjacent to or connected with State waters).

Facility	Point of Contact	Date Approved	System	Effluent Treatment & Disposal Plan
<p>SDSU Coastal and Marine Institute Laboratory 4165 Spruance Rd, Suite 100 San Diego, CA 92101</p>	<p>Name: Renee E. Angwin, Lab Manager Email: [REDACTED]</p>	01/20/22	closed system (RAS)	<p>Effluent: RAS waters are disposed of in the municipal sewer system Disposal: solid waste will be bagged and disposed of in the trash</p>
<p>Urchinomics 565 Shell Harbor Ln, Port Hueneme, CA 93041</p>	<p>Name: Peter Struffnegger, Operations Manager Email: NA [REDACTED]</p>	01/20/22	closed system (RAS)	<p>Effluent: RAS waters are disposed of in the municipal sewer system Disposal: solid waste will be bagged and disposed of in the trash</p>

12) Recipient locations for transport by the Project Manager must be pre-approved by the Department (Table 2). Additional facilities adjacent to or connected with State waters must be requested for Department staff consideration by providing the following information to Kristen Elsmore [REDACTED] at least two weeks prior to initial proposed delivery date:

12a) Facility name and address

12b) Point of contact for recipient facility (name, email, and phone number)

12c) Description of facility's *S. horneri* holding and disposal plan (effluent and degraded/unused *S. horneri*)

13) To reduce the risk of potential disease transmission and physical spreading to new locations, facilities receiving *S. horneri* from the Project Manager must hold *S. horneri* in closed/recirculating systems. Effluent water from closed/recirculating systems (e.g., when cleaning or disposing of any recirculated seawater) must be treated with UV sterilization, Ozone, or chlorination. Effluent that flows directly into municipal wastewater systems do not need to be treated.

14) To reduce the risk of potential disease transmission and physical spreading to new locations, facilities receiving *S. horneri* from the Project Manager must dispose of *S. horneri* waste (e.g., unused, or degraded algae) such that it does not come into contact with the ocean or waters leading to the ocean.

15) Approved species **may not** be collected in marine protected areas or other marine conservation areas.

16) The Project Manager must avoid collecting the approved species in areas where researchers may have study sites, specifically the following study areas must be avoided (coordinates are for the centroid of the areas) when collecting *S. horneri*:

Near Anacapa Island:

34.018, -119.364

34.010, -119.388

34.013, -119.389

34.006, -119.394

17) The Project Manager shall not take or possess any other species of invertebrate, fish, or other marine algae while on a trip or when taking *S. horneri* under the authority of this condition letter.

18) No *S. horneri* specimen shall be returned to the waters of the State.

19) *S. horneri* taken under this license may be inspected periodically by the Department. Such inspection shall be coordinated by Department staff.

20) A copy of the valid Commercial Kelp Harvesting License, this condition letter, *Sargassum* Identification Guide, and a valid driver's license or DMV identification must be in the Project Manager's possession at all times while collecting or transporting under the authority of this condition letter.

21) The Project Manager shall comply with all applicable State, Federal, and local laws in existence on the effective date of this condition letter.

Notification and Reporting:

1) The Project Manager shall via email notify Fish and Wildlife Assistant Chief, Eric Kord at [REDACTED] and Kristen Elsmore [REDACTED] of intent to collect or transfer possession *S. horneri*, including intended collection date, collection location, landing port, and facility transfer location(s), at least **24 hours prior** to any collection activities and transfer of possession to recipient facilities.

2) The Project Manager shall maintain an accurate, current record of all *S. horneri* collected and maintained under this license. Such records shall include the latitude/longitude coordinates of location of take and describe the total landed weight, number and range of length of individuals collected, date of collection, destination, use, and disposal of *S.*

horneri. This information shall be provided via a summary report to be submitted by **January 31, 2023**, or within one month of ceasing collections of *S. horneri* approved for take to Kristen Elsmore [REDACTED]

3) Per CCR, Title 14, Section 165, following the collection of *S. horneri* pursuant to the Commercial Kelp Harvesting License, the Project Manager shall record the required information in the Commercial Edible Seaweed/Agarweed Aquatic Plant Harvester's Monthly Report, (DFW 113A).

4) Per CCR, Title 14, Section 165, monthly reports of harvest with harvest royalty fees, \$24.00 per wet ton (\$0.012 per pound wet weight) harvested, shall be submitted to the address specified on the report, on or before the 10th day of each month, following the month to which the records pertain.

5) Intent to renew this condition letter shall be provided by the Project Manager to the Fish and Game Commission at least 60 days prior to the expiration of this condition letter.

This condition letter, *Sargassum horneri* ID guide, valid Commercial Kelp Harvesting License, and a valid driver's license or DMV identification must be in possession of the Project Manager when conducting any activity authorized by this letter and must be shown upon request to any person authorized to enforce Fish and Wildlife regulations. This condition letter does not relieve the Project Manager of the responsibility to obtain any other required permit(s), or comply with any other Federal, State, or local laws and regulations.

Attachments:

Sargassum horneri Identification Guide

Commercial Edible Seaweed/Agarweed Aquatic Plant Harvester's Monthly Report, (DFW 113A)

Sincerely,



Kristen Elsmore, Environmental Scientist
Nearshore and Bay Management Project
Department of Fish and Wildlife

ec: Eric Kord, Assistant Chief
Southern Enforcement District
Department of Fish and Wildlife
[REDACTED]

Jason Kraus, Lieutenant
Southern Enforcement District
Department of Fish and Wildlife
[REDACTED]

Kirsten Ramey, Program Manager
State Managed Finfish and Nearshore Ecosystem Program
Department of Fish and Wildlife
[REDACTED]

Rebecca Flores Miller, Environmental Scientist
Nearshore and Bay Management Project
Department of Fish and Wildlife
[REDACTED]

Lindsay Orsini, Environmental Scientist
Southern California Invertebrate Management Project
Department of Fish and Wildlife
[REDACTED]

Notice of intent to renew: Kelp Bed L-26 lease

Doug Bush [REDACTED]

Thu 11/03/2022 10:23 AM

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

Cc: Flores Miller, Rebecca [REDACTED] Ashcraft, Susan [REDACTED]

[REDACTED] Lovell, Randy [REDACTED]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

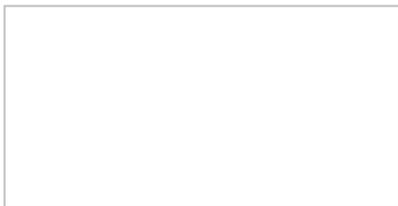
Please find attached our notice of intent to renew the lease of kelp bed L-26.

Hard copies have been mailed to CA FGC and to DGS.

Confirmation of receipt is requested.

douglas bush
managing member/gm
the cultured abalone farm, llc

[REDACTED]





November 3, 2022

California Fish and Game Commission
PO Box 944209
Sacramento CA 94244

Department of General Services
State Owned Leasing and Development
PO Box 989052
West Sacramento CA 95798

RE: Notice of intent to renew lease L-2724 (Lease of kelp bed L-26)

The Cultured Abalone Farm LLC (TCAF) provides timely request to exercise the right to renew the lease of kelp bed L-26 (Lease number L-2724) for a new 5-year term. TCAF is in compliance with the terms of the existing lease.

Per Section 7 of the current lease ("Renewal"), TCAF requests a determination of compliance by the State and a discussion of any terms required for renewal, including the required Fish and Game Commission approval of the Kelp Harvesting Plan (KHP), to be completed in a timely manner.

Signed
Douglas Bush, LLC Managing Member

FGC meeting, December 14, 2022, #2: General Public Comment

Phoebe Lenhart [REDACTED]

Thu 12/01/2022 03:26 PM

To: FGC@public.govdelivery.com <FGC@public.govdelivery.com>;FGC <FGC@fgc.ca.gov>

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear FGC Commissioners,

I would like to bring to your attention a very grave matter regarding multiple (as many as 5 poisons) rodenticide poisonings of the cougars (mountain lion, puma) in CA. Recently, on June 17, 2022 a female cougar, pregnant with 4 cubs, was found dead. While the nature of her death is assumed to be vehicle related, my point is that the cougars in CA are ingesting not 1 rodenticide or 2 rodenticides or 3 rodenticides; but a many as 5 different poisons that are detected in their blood.

It is my understanding that the DFW has been studying for 20 years whether or not rodenticides can pass through the lioness' placenta to the cubs. Frankly, this does not sound like "rocket science" worthy of 20 years of tax payer funding. Any high school biology student is capable of answering the question: whether poisons in the blood of a pregnant lioness/queen will pass into the blood of her unborn cubs?

My point is that this very endangered and vulnerable species' survival in CA appears against the odds. In addition to rodenticide poisons and vehicle related deaths; there is the huge nexus of climate change appearing as wildfires, drought, habitat loss, among them. The DFW refers concerns referring to cougar poisonings to the Department of Pesticide Regulation (DPR) in the California Environmental Protection Agency (CEPA). From there, who has heard anything regarding protecting the cougars from poisonings?

I am writing to the FGC to request a multi-agency attempt to reduce cougar poisonings in CA and to do more to enhance the environment that is adverse to the survival of the cougars. I welcome the Wildlife Resources Committee (FGC) to collaborate with the Department of Pesticide Regulation and the DFW to reduce rodenticide exposure for California's cougars. I would appreciate seeing this matter addressed on the agenda for the Wildlife Resources Committee promptly. CA cannot afford the loss of any cougars or in particular, the poisoning of cubs of any pregnant lioness/queen due to rodenticides.

Your attention to this urgent matter will be appreciated very much.

Sincerely,

Phoebe Lenhart

[REDACTED]

[REDACTED]

WE ENCOUNTERED THE DEADLY RED TIDE ALGAE BLOOMS ONCE..

Ace Carter - Super Angler [REDACTED]

Sun 10/09/2022 05:47 PM

To: Angling International Magazine [REDACTED]

Cc: Fishing Tackle Retailer - Ken Cook - Letters To The Editor [REDACTED]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

WE ENCOUNTERED THE DEADLY RED TIDE ALGAE BLOOMS ONCE..

FISHING OUT OF THE SANTA BARBARA LAUNCH RAMP IN MY CENTER CONSOLE LONG AGO...

MY FISHING BUDDY BILL AND I FISHED THE KELP NORTH OF THE HARBOR AND THEN DRAGGED LURES ON THE BOTTOM ALL THE WAY BACK DOWNSTREAM...

NO ONE WAS AT HOME...

NOT EVEN A SINGLE BITER...

WE FISHED HARD FROM DAWN UNTIL ABOUT 2 PM...

AT ALL THE TYPICAL GOOD PLACES LIKE NAPLES REEF...

THE ALGAE PLUME EXTENDED FOR MILES OUT TO SEA...

I DID SNAG A LARGE SEA SNAIL THAT MEASURED ABOUT SIX INCHES AND TOSSED IT INTO THE BOTTOM OF THE BAIT TANK...

WHILE PUTTING THE BOAT AWAY AND STOWING OUR FISHING GEAR A FEMALE CA GAME WARDEN APPROACHED US...

SHE APPEARED RATHER MANNISH AND OFFICIOUS AND I EXPECTED TROUBLE...

SHE ASKED US HOW WE DID, PROBABLY WANTING TO INSPECT OUR CATCH...

I TOLD HER WE STRUCK OUT DUE TO THE ALGAE AND ONLY CAUGHT A SNAIL...

SHE GOT THE LIVE SNAIL OUT OF THE LIVE WELL AND HELD IT WITH BOTH

HANDS IN A CAREFUL AND EVEN CHERISHING MANNER...

AND WALKED DOWN TO THE RAMP AND CAREFULLY BENT OVER AND RELEASED THE
SNAIL INTO THE HARBOR WATERS...

THE SNAIL JUST SAT THERE...

I WAS HOLDING MY BREATH HOPING BILL WOULDN'T LAUGH AT HER OR MAKE A
JOKE BECAUSE THIS WARDEN WAS SERIOUS...

SHE CAME BACK TO US AND GAVE US A LECTURE ON TAKING TIDE POOL CREATURES...

ACE

--

- THE WORLD FAMOUS ACE'S BAIT & TACKLE

- Lots Of Free Fishing Advise -

- NO EXTRAVAGANCE IS TOO GREAT FOR FISHING -

- PEARBLOSSOM FISHING CLUB -



- Let's Make California Great Again -

- FIRE ALL THE LAZY BUMS AND LOAFERS IN CALIFORNIA GOVERNMENT -

Ban Agonizing Bow and Arrow Assaults Against Bears and Other Wildlife

louis gauci [REDACTED]

Wed 10/12/2022 09:39 AM

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

Dear Ms. Melissa Miller-Henson,

“He laid on his side, he perched his head up to look at us and, almost as though asking for help, he lifted his paw up, which was the most heart-wrenching thing.” These words came from an Arcadia resident who came upon an injured and possibly dying, bear in his backyard. This animal was likely the latest victim of this state’s largely unregulated bow-hunting practice, which is the most lenient in the nation.



While California has established itself as a progressive leader in many ways, this state still woefully lags in the protections and respect it affords its wildlife. Do you really want to be known as a place where the echoes of painful moans are the sounds reverberating through neighborhoods? Do you want the first experiences children to have with wildlife to be images of slaughter? And do you want to replace conservation with unchecked cruelty?

If the answer to any of these questions is no, then do something. Reign in unregulated bow hunting before the next victim falls.

Sincerely,

Louis

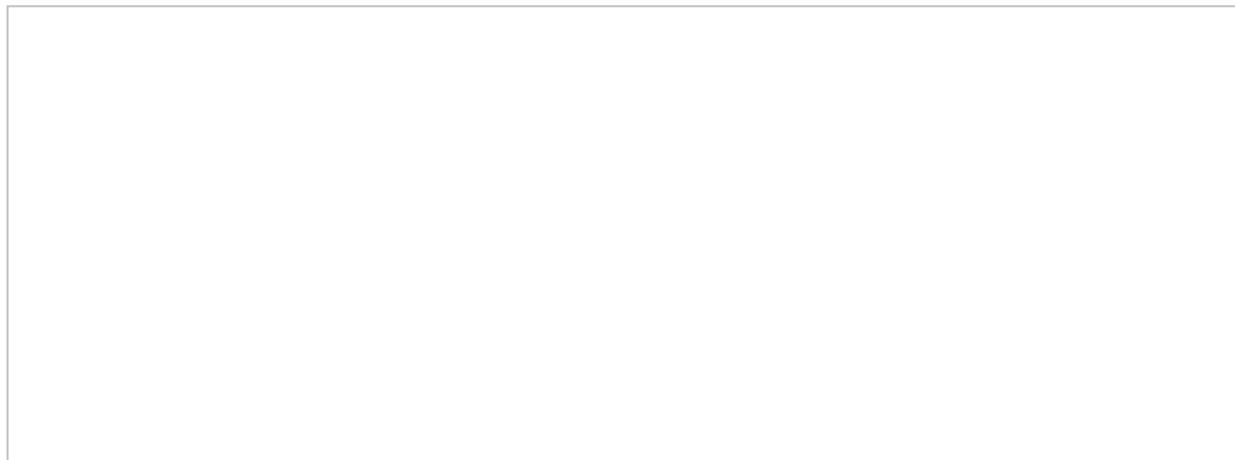
Draft Mitigation and Minimization Plan for Wind power. 10/17/2021

Ken Bates [REDACTED]

Wed 10/19/2022 11:16 AM

To: FGC <FGC@fgc.ca.gov>;Jaque Hostler-Carmesin [REDACTED]

Cc: Bonham, Chuck [REDACTED]



October 19, 2022

Dear Commissioner Hostler-Carmesin,

We are responding to your comments made during the afternoon (approximately 4:08pm) of October 12, 2022 at a meeting of the Fish and Game Commission.

North Coast fishermen's associations have been seriously involved in OSW development starting in 2015 when offshore wind development was first planned for the Central Coast. Humboldt Fishermen's Marketing Association (HFMA) has maintained close contact with these Central Coast fishermen's associations as well as outreach to North Coast and Southern California fishermen's associations.

In 2017, HFMA began meetings with Matthew Marshall and his staff at Redwood Coast Energy Authority (RCEA). HFMA Board Members expressed fishermen's concerns about the negative impacts of OSW to their industry. In 2018, HFMA signed a "MOU" with RCEA to open lines of communication. In addition to meeting with RCEA staff, HFMA has participated in meetings with potential wind developers and RCEA.

HFMA has also hosted a dozen meetings with staff from CDFW, State Lands, the Coastal Commission and the CEC and we have been able to establish effective "points of contacts" with these agencies. BOEM has often been a participant in these meetings.

In 2021, the fishermen's associations of Crescent City, Trinidad Bay, Humboldt Bay and Fort Bragg completed the North Coast Fishermen's mapping project which supplied species and habitat mapping of fishing grounds from Point Arena to the Oregon Border. This was a response to developers and BOEM who wanted to know "where do you fish?". This project was funded by a \$90,000 Ocean Protection Council grant and supported by Representative Huffman, CDFW, State Lands Commission and California Coastal Commission. This database is now accessible to wind power developers, state and federal agencies, research institutes, and the public through the California Offshore Wind Data Basin. This project was so successful that the State Agencies encouraged the Central Coast fishermen to undertake a similar mapping project for their fishing grounds.

In 2022, fishermen from San Francisco to Crescent City formed the California Fishermen's Resiliency Association (CFRA); this nonprofit is dedicated to the avoidance, minimization and mitigation of impacts to commercial fishing. The formation of the CFRA was a direct result of repeated requests by State agency staff including Dr. Kate Hucklebridge, Commissioner Courtney Vaccaro, Karen Douglas of the CEC, Chris Potter of CDFW and Mathew Marshall of RCEA. RCEA provided a \$20,000 grant as start-up funds and the Ocean Protection Council is presently processing additional state funding for the CFRA.

Fishermen in Humboldt have been involved at the State and Federal level for nearly five years and have developed networks that represent hundreds of fishermen. Recently we have had a conversation with HAF/Core Hub trying to understand their position on support for the local fishing fleet. The fishermen feel that HAF's position is a very localized effort to enlist land based stakeholders in Humboldt County.

California port commercial fishermen's associations and the CFRA continue to engage and comment at State and Federal levels.

We would appreciate that you would share this communication with others including your fellow commissioners and staff. At the Commission's pleasure, the CFRA Board would be available for a short presentation at a Commission meeting. We are providing a couple of policy documents for your inspection.

Sincerely

Ken Bates, President

California Fishermen's Resiliency Association

Release

June 9, 2022

The **California Fishermen's Resiliency Association** (CFRA) is pleased to announce the following:

In January 2022, seven Northern California Port Commercial Fishermen's Associations formed the California Fishermen's Resiliency Association, a California nonprofit Mutual Benefit Corporation. The California Fishermen's Resiliency Association now serves as a "point of contact" and negotiator for fishermen with developers of offshore wind power, telecommunication and energy transmission subsea cables, and offshore mineral extraction projects. The CFRA represents all fisheries and gear types through its member fishermen's associations which include the ports of Crescent City, Trinidad Bay, Humboldt Bay, Shelter Cove, Fort Bragg/Noyo, Bodega Bay and San Francisco. Planning is underway to expand the CFRA membership to include California Port Fishermen's Associations of Central and Southern California.

The CFRA is structured to encourage statewide cooperative policies and protocols related to offshore wind power and cable projects in a way that protects fishermen and fishing communities from impacts that result from these developments and allows California to move towards realistic renewable energy goals statewide.

This new association, representing California fishermen for the purpose of working cooperatively with state agencies and offshore developers, has been formed under the positive influences of policy documents produced by the Alliance of Communities for Sustainable Fisheries, the Central Coast Cable Fund Committee and the extensive work between the offshore wind developer Castle Wind LLC and Morro Bay and Port San Luis Fishermen's Associations. Castle Wind, advocating for a non-solicited wind energy lease site west of Morro Bay nearly six years ago has responsibly and consistently engaged with Central Coast Fishermen's Associations to negotiate a comprehensive "Fishing Community Benefit Agreement" to avoid, minimize and mitigate for impacts to commercial fishing from offshore wind (OSW) development on California's Community Fishing Grounds. In doing so, Castle Wind has set a high standard for industry- to- industry "Fishing Community Benefit Agreements" (FCBA's) in their efforts to address the concerns of California's commercial fishermen.

Based on the collective efforts mentioned above, the CFRA advocates for the use of FCBA's which are industry-to-industry contracts. These agreements provide for industry-to-industry communication, operational protocols, cooperation and monetary resources to help alleviate impacts to coastal fishing communities. The CFRA Fishing Community Benefit Agreement template allows for multiple OSW Developers operating in Northern California to participate through the formation of CFRA regional management committees who are responsible for local administration of the Fishing Community Benefit Agreement provisions. The CFRA welcomes the opportunity to meet directly with potential offshore wind power developers who are considering submission of a bid on either of the two Humboldt Wind Energy lease sale areas.

The CFRA Board of Directors appreciates the support of the California Coastal Commission, the California Energy Commission, State Lands Commission and the Ocean Protection Council in these agencies' efforts to support California's Fishing Communities and the formation of the CFRA.

Thank you,

The CFRA Board of Directors.

Dustin Owens, Legal Counsel

Sent from my iPad

Draft Minimization and Mitigation Plan for Offshore Non-fishing Development in Humboldt County

Draft Date - August 2021

New Draft Date - October 17, 2021

By Ken Bates and Linda Hildebrand

Preamble

As of 2020, federal, state and local agencies are advocating for the development of offshore wind power, submarine cables and non-petroleum based energy production on California's coastal fishing grounds. California has the most regulated ocean and fishing industry worldwide. Nearly every square inch of California's coastal ocean is covered by fishing closures, marine protected areas, national marine sanctuaries, naval training areas, munitions dumping grounds, submarine cable lanes, vessel traffic separation schemes, national parks, gear, depth and fish species restrictions and fossil fuel development. For California fishermen, the coastal ocean is 100% utilized— there is no “unused” space. This complete utilization manifests itself by fishermen employing various types of fishing gear targeting a wide range of species of fish as seasons change throughout the year. The displacement of fishermen by offshore development from one coastal ocean area of fishing grounds doesn't only affect those individuals and boats, but instead exerts a negative impact on all fishermen as fishing businesses try to relocate onto already occupied fishing grounds

The displacement of fishing activities by offshore developers starts on the fishing grounds and continues right into California's coastal harbors and the coastal communities dependent on the fishing industry as a local economic driver. The loss of this sustainable renewable seafood resource harvested on our community fishing grounds is for all intents and purposes, forever. These losses are often referred to as the “deferred cost of doing business”. These deferred costs heaped on coastal communities are a direct result of offshore non-fishing development, and in the past have been allowed by permitting agencies to damage fishing families and coastal communities as the “cost of doing business”. This practice is no longer valid. Offshore marine development impacts every single fisherman, and the local coastal economy whether directly or indirectly. The following document written on behalf of the Humboldt Fishermen's Marketing Association (HFMA) Board of Directors is designed to address the concerns, minimize the impacts to, and mitigate damages to all fishermen by offshore development. The fact that these impacts are real, universal and long lasting is not subject to debate.

Section 1 - List of Impacts

1. Initial Impacts

- a. Initial impacts to fishermen, fishing families, and fishing communities begin with the announcement of yet another non-fishing spatial challenge potentially resulting in the loss of additional community fishing grounds and the resources

(fish) harvested from these grounds. While not easily quantifiable in dollars and cents, the looming threat adds to an already unsteady footing of coastal communities and their ability to prevail over the interests of well funded multi-national development corporations. The community's efforts to protect itself, which is always a totally unpaid volunteer effort, results in lost income, large blocks of time consumed in resisting a usually overwhelming force of paid corporate consultants and a continued erosion of social and cultural coastal quality of life. This document is an example of one of the impacts.. While non-quantifiable in dollars and cents, these sociological impacts are great and long lasting. These challenging impacts hobble coastal members' ability to make any realistic long term plans for continued investment in business and family health and security.

- b. **Legal Counsel** — Local fishermen's organizations need to engage with legal counsel at the beginning of any proposed non-fishing coastal development proposal as a method of ensuring that fishermen and Coastal Fishing communities have some small hope of leveling the playing fields both in negotiations with developers and interaction with state permitting agencies. Funding the costs associated with the employment of attorneys hired to protect fishing interests is generally cost prohibitive for any individual fishing association or fishing community interest group.

2. Harbor Impacts

- a. Displacement of fishing fleet activities from existing shoreside facilities through the takeover of these facilities by offshore development. Typically, the loss of fishing fleet facilities by offshore developers is commonly referred to as a "conversion", and is generally condoned and expedited by local bureaucracies.
- b. **Hazards to Navigation** — Offshore development will potentially create additional hazards to navigation in Humboldt Bay through channel blockage by barges, tugs, equipment and floating assemblies, both during periods of limited visibility and high fishing vessel traffic.
- c. Direct competition between offshore development activities and fishing industry for existing facilities in Humboldt Bay. eg. fuel docks, hoists, boatyard services, work and gear storage areas.
- d. Hazard to transiting fishing vessels by the movement of tug traffic, barges, crew boats, and the transportation of assembled modules and components within and in and out of Humboldt Bay
- e. Entrance bar hazard caused by offshore projects requiring channel deepening (dredging) — Post federal channel deepening projects have resulted in an increased tidal prism leading to increased ebb current speed which in turn caused greater hazardous entrance bar conditions. These increased current velocities have limited the period of safe passage through the Humboldt Bay entrance bar for fishing fleet ingress and egress. Offshore development which

would require channel deepening will again subject fishermen to increased hazardous conditions during inclement weather and sea conditions.

- f. **Displacement and Restrictions of in-bay fisheries** — Humboldt Bay is the only location between San Francisco, CA and Westport, Washington for the albacore “live bait” fleet to seine anchovies and sardines for live bait. Most fishing takes place between the U.S. Coast Guard Station and the Redwood Marine Terminal I dock. Offshore development activities at Redwood Marine Terminal I, Fairhaven Dock, 14th Street Dock and along the Eureka Inner Reach will impact fishermen’s abilities to take anchovies and sardines during May thru early November, both through spatial challenges and disruption of fish behavior by increased vessel operations, noise, nighttime illumination and electro-magnetic disturbances.

3. Impacts from Ocean Surface Transit Lanes

- a. The transportation of modules, equipment, barges, anchoring systems and cable laying vessels will result in the extensive loss of fixed “bottom contact” gear including, crab traps, prawn traps, hagfish traps, longline gear and sable fish traps, as developers vessels run through these legally set fishing gears on the community fishing grounds.
- b. Mobile fishing gear such as trolling, seining and trawling will be excluded or displaced by the activities listed above.
- c. The transportation of modules, equipment, barges, anchoring systems, cable laying vessels and survey vessels will result in congestion and navigation hazards on the fishing grounds occupied by fishermen.

4. Impacts from Submarine Cables

- a. Installation of submarine data transmission cables and electric power transmission cables will result in the loss of access to the fishing resources adjacent to these cables. These losses affect all fishermen by displacing the fishermen previously operating in areas now designated as cable transmission lanes.
- b. Fixed and mobile bottom contact fishing gear will be entangled or lost on submarine cables exposed and/or suspended on the seabed. This gear loss will start within the 4-5 fathom depth contour and continue out to the 800 fathom depth curve.
- c. Fishermen expect significant disruption of marine life both in the water column and the benthic areas exposed to strong electro-magnetic fields from electrical power transmission cables. It is common knowledge that a fishing boat containing faulty electrical wiring will impact that vessel’s ability to catch species such as salmon and albacore tuna. As little as three or four tenths of a volt when measured against the vessel’s bonding system can be enough to interfere with fishing success.

- d. Interruption of fishing activities by the installation, maintenance and removal of submarine cables throughout the lifespan of individual cables. It is well documented that acoustical survey work, drilling and burying of subsea cables has a direct negative impact on fin fish behaviors which results in depressed fish catches in the vicinity of these non-fishing operations.
- e. Interconnecting cables between floating turbines present de facto fishing closures of water column and benthic fishing grounds and present major hazards for various surface fishing gear types including salmon trolling gear that operates up to 600 feet in depth.

5. Impacts at Ocean Lease Sites

- a. The Humboldt County community will lose all the fish and seafood resources on any lease area. The actual footprint per “unit” is not an accurate indicator of the true negative impact of the loss of resource access because there will be no fishing of any kind between or around various anchored power generation units. The whole lease area will be lost also because individual units may be relocated to other sites within the lease area
- b. Many square miles of fishing grounds may be rendered “unfishable” due to loss and abandonment of anchoring systems, cables, construction materials and miscellaneous junk “disposed” of on community fishing grounds, by both contractors and subcontractors working under the permit umbrella of developers.
- c. The effects of anchoring systems and electrical transmission on hard bottom (reef) marine communities are unknown. These offshore development projects are advocated for and planned to go forward without any biological baseline studies of fish and benthic communities on these lease sites. Undocumentable damages to lease site biological communities will be shouldered by fishing communities and not by offshore corporate developers.
- d. Impact of catastrophic loss of power generation units due to environmental conditions**
 - i. The potential for catastrophic loss of offshore power generation units is huge. The ocean off Humboldt County has recorded some of the largest waves recorded on the west coast during winter weather events. These recorded weather events (storms) typically include wind velocities of 30-60 knots and wave heights in excess of 30 feet with wave periods of less than 20 seconds. Fishermen fully expect wind power or wave energy units to be drug off station, parted from their electrical transmission cables and carried completely away by winter storms (see USCG super buoy, Cape Mendocino). Breakaway units driven by wind and currents will collect hundreds of Dungeness crab traps on their way to grounding on our beaches during the December to June season. Hagfish, sable fish and longline gear are also at risk of loss. Ultimately, wind power units carried away by ocean currents during winter weather events will end up on west coast beaches. Salvage of these units may be problematic or

impossible depending on the coastline structure where these units might go aground.

- ii. Abandonment of cable, damaged equipment and anchoring systems will occur during winter storms potentially scattering debris outside of lease sites onto fishing grounds with no way to track or retrieve this junk.

e. Catastrophic Loss of Power Generation Units due to Mechanical Failure

- i. All human built infrastructure is subject to catastrophic failure. High failure rates of infrastructure in hostile environments is well documented. One can go online and type in “wind turbine failures” and immediately numerous videos pop up with footage of catastrophic failure of land based wind turbines. These failures include electrical fires in generator components, individual turbine blade failure and “over speed” turbine events resulting in explosive deconstruction of the turbine components and collapse of the tower (mast) supporting the turbine. These failures have two things in common; they result in an extensive debris field and are land based. One could conclude that the salvage and clean-up of a land based failure while challenging is also possible. These catastrophic failures resulting from fires and over speed events will also occur at ocean based wind turbine units. Ocean conditions such as “current set” and “wind drift” will propel the rapid expansion of the resulting ocean debris. This wind power debris will then quickly move outside of the lease area. Some components will eventually sink to the seabed, thereby fouling community fishing grounds. Floating components will present serious hazards to navigation. The attempt to clean up the debris field may be impossible for weeks or longer, severely hampered by inclement ocean conditions. Decoupling and removing what remains of damaged floating turbine units from the lease area will also prove to be seriously challenged by weather and in some cases present extreme danger to salvage crews and salvage vessels attempting to remove these structures. Who will do this work? Perhaps no one,

f. Transfer of title and subsequent abandonment of energy infrastructure

- i. Energy, mining and other extractive industries work via a worldwide model which allows developers to maximize profits and minimize or totally defer maintenance costs. Initially a well funded, and often well known major development corporation will begin exploration, development and extraction of a resource. In this century, oil extraction is the prominent example. Once the infrastructure is built and operating, maintenance is kept to a minimum and costly major overhauls of said infrastructure are avoided. When the profitability of any particular extractive process decreases to a certain point, the initial developer transfers title (sells) the infrastructure and equipment to less well funded, marginal operators. Often as not, the purchasers of these assets acquire and operate the facility via layers of multiple “shell” corporations to avoid legal liability

connected with their operation and eventual abandonment of these marginal extractive facilities and equipment. The Gulf of Mexico and adjacent U.S. States contain thousands of abandoned oil wells, and thousands of miles of oil and gas pipelines. In California, the State is still trying to clean up oil wells in the nearshore Santa Barbara ocean waters which were drilled in the early 1900's. Texaco famously abandoned an early oil platform at Ellwood Beach in Santa Barbara. Offshore telecommunications companies landing fiber optic cables in California waters continually advocate for abandonment of fiber optic cables at the end of these cables' profitable lifespan. No one should expect that international wind power developers will step away from this model of maximizing profit, then selling outdated or marginal equipment to other operators to avoid the responsibility of maintenance, and removal of low profit wind power components from California's Community Fishing Grounds.

g. Decommissioning Impacts

- i. Decommissioning impacts can be as great as operational impacts. Many wind power and fossil fuel operators advocate for "decommissioning in place", a heavily spun terminology for the abandonment of outdated or financially "written off" equipment onto community fishing grounds. Sold to the public as "artificial reefs", this abandoned junk destroys miles of fishing grounds and presents biological challenges to existing habitats by allowing species displacement by non-native organisms more suited to colonizing this abandoned equipment.
 - ii. Funded Decommissioning Activity impacts — Funded and required decommissioning and removal of obsolete or damaged infrastructure, while the correct remedy for restoration of community fishing grounds, presents additional interruption of local fishing operations. Submarine cable operators in Central California are mandated to remove old cables while compensating local fishermen interrupted by removal activities.
- h. Impacts from actions of subcontractors** — Impacts to fishing activities by the actions of cable and offshore energy subcontractors is prevalent and problematic. Offshore oil subcontractors are infamous for "the deep sixing" of unwanted equipment, materials and damaged supplies onto community fishing grounds. These illegal deposits are difficult to confirm but wreak havoc with bottom contact fishing gear. Fishermen "discover" these discards when losing fishing gear in areas previously proven to be clean. Typically, energy companies deny responsibility for fishermen's gear losses on these discards.
- i. **Impacts from Multinational Developers Legal Counsel** — Financial and emotional/moral impacts and costs heaped on small community groups by "paid for" predatory behavior by legal staff working for large scale development are not exclusive to coastal fishing communities. On any given day on all corners of the planet, fringe groups of people of color, the poor, undereducated, native groups

and others are the target of multinational developers “hell bent” on maximizing profits, high stock exchange values, shareholder payouts and disgustingly high executive compensation, all at the expense of the environment and the local populations that these corporations exploit. First hand reports from other fishermen groups attempting to defend community fishing grounds and fish resources describe an insidious process that starts with the “nice guys” representing the developers at meetings. Lots of bullshit terminology gets thrown around — “stakeholders”, “community inclusiveness”, etc., all smoke to increase community confusion in the “fog of war” these developers create in order to advance their goal — control and domination of the dialogue. As this process continues, community leaders form the false conclusion that their message is actually having an effect on the developer’s plans. Somewhere in the process the developers initial negotiators disappear and are replaced by more attorneys. Non-disclosure agreements (NDA’s) miraculously appear to silence any negative public comment or outcry on the community’s part. This is usually followed up with the “negotiated agreement” document which can only be read under a microscope. As Tom Waits accurately said “the large print giveth, and the small print taketh away”. Usually by this point the group in the crosshairs of the attorneys start to realize too late that they lost almost all of the community assets to the developers and are left with little legal recourse. Only after the fact does the community realize that the only realistic approach in hindsight was an all out assault to kill the planned project. In California, fishermen have at least a small chance of being listened to by the California Coastal Commission — the only agency protective of California’s Coastal Fishing Communities. Immediate involvement with Coastal Commission staff is absolutely necessary the first moment another offshore development project crawls out from under its rock. Every public comment, email, meeting minutes, and communications between fishermen and developers should be forwarded to the commission to establish a clear concise paper trail depicting the fishing communities position. This documentation is critical if negotiations fail and legal action by the community is in order.

6. Impacts from State and Federal Agencies

- a. Fishing communities have and will continue to be negatively impacted from both the actions and inactions of state and federal agencies responsible for environmental protection, protection of coastal dependent commercial fishing and permitting of non-fishing development on California’s community fishing grounds. While accurately forecasting future actions and policies of these agencies is problematic, we can certainly learn from past agency performance. In California the permitting installation and operation of submarine cables presents a real time lesson for fishermen. Submarine cable projects are ridiculously simple compared to offshore and wind power development. California has four “cable projects”

landing sites, all which impact fishermen. The California Coastal Commission (CCC) and State Lands Commission (SLC) have no policy or guidelines for the mitigation of cable impacts on coastal fishermen. Two of the cable mitigation programs administered directly by multiple port fishermen's associations are successful, while two similar projects have been failures. The CCC and SLC has since June 2020, been repeatedly requested to reform the Point Arena Cable fund which has operated as a private slush fund for five trawl fishermen for more than twenty years! In spite of multiple requests from two fishermen's associations and legal counsel, the agencies have made no significant effort to reform the Point Arena fund, which is under their jurisdiction. In August of 2021, the CCC and SLC allowed a developer, representing an international cable group to form a shell corporation populated by only five trawl fishermen, drafted a "fishing mitigation agreement" contract which the developer then executed with the shell corporation it paid to form! The state agencies not only endorsed the developers detrimental behavior, but simultaneously rejected an "Amended Fishing Agreement", submitted by twelve California fishermen's associations representing over 350 fishermen. In June of 2020, fishermen in Mendocino County became aware of a cable project "drilling mud blow-out" event and the loss of equipment on the Manchester Beach Fishing Grounds. Salmon Trollers Marketing Association (est. 1954) contacted CCC, SLC and the California Department of Fish and Wildlife (CDFW) requesting reports from the developer, RTI Infrastructure, Inc and its subcontractor Tull Communications concerning the blowout event and any equipment, drill pipe on debris left on the fishing grounds. None of these agencies responded even though all three agencies have jurisdiction over the development of this cable project. As of October 2021, CDFW has been assigned the task of collecting fishermen's concerns over the planning, siting and operation of OSW in California. They are required by the Governor's office to list impacts that fishermen anticipate will negatively affect fishing and coastal communities. CDFW is then to bring these concerns to other state agencies. The process looks like this - outreach, translate, edit and forward data .California DFW nor the Fish and Game Commission have any history of protecting coastal fisheries from offshore development. These agencies are mandated with the protection of California's natural resources and occupy a secondary position to the agencies permitting OSW. Fishermen need consistent direct access to CCC, SLC and the State Energy Commission, not interpretation by yet another layer of bureaucratic insulation.

Section 2 - Minimization of Impacts

1. **Seasonal restrictions imposed on the movement of equipment on/off of lease sites** — These restrictions of movement will be required to protect fixed gear (bottom contact) fishing equipment from loss during crab, black cod and other seasonal use of community fishing grounds.
2. **Seasonal Restrictions on Cable Installation, Routine Maintenance or Removal** —Activities concerning the installation, routine maintenance or removal of submarine cables of any type will be restricted or curtailed during seasonal use of community fishing ground — especially those fisheries dependent on fixed ground contact fishing gear.
3. **Automatic Identification System (AIS) Compliance** — All vessels, barges, scows and each individual floating turbine unit will employ and continuously broadcast AIS signals at all times for the purpose of tracking the movements and paths of support ships, equipment and floating turbine units within the “port of assembly”, during transportation across community fishing grounds and positioning at call area sites. Electronic records of AIS track lines will be maintained for a period of ten years on a website available to the public for the purposes of establishing fixed fishing gear losses by transiting wind power vessels and equipment, and for tracking the path of floating turbine units found to be “off station” or found drifting after a catastrophic parting of anchoring systems.
4. **Inventory and Serialization of Wind Power Components** — Developers will be required to mark all wind power components with both permanent and prominent company serial numbers which identify each component of the anchoring systems, turbine systems and interconnecting transmission cable assemblies. These serial numbers will be used to track the deployment and retrieval or loss of each wind power developers' equipment. Before deployment, all serial numbers of components will be verified by a licensed marine surveyor in the “port of assembly” by written and video formats. These written and video records will be used to verify compliance with the repair, retrieval and decommissioning of any wind power components deployed in the call area or lost on the Community Fishing Grounds.
5. **Location and Retrieval of Failed Wind Power Components** — Developers will locate and retrieve all lost, failed or jettisoned wind power components including but not limited to turbine blades, masts, buoyancy hulls, anchor components, interconnection and transmission cables. When located, either in the call area or outside of the call area on the community fishing grounds, developers will immediately publicize the geographic location of lost or failed components via local “Notice to Mariners”, through local governments agencies and local and statewide fishermen’s associations. Developers shall begin location and retrieval efforts of lost wind power components within ten days of acknowledgment of said losses or malfunctions. Fishermen who hang up and/or lose

fixed or mobile fishing gear on these lost or failed components will be compensated by the developer for lost fishing gear and lost fishing opportunity.

6. In the event that equipment, components, or cables would require installation routine or emergency maintenance or removal, a developer at the developer's sole expense, will employ local fishing vessels and crew to assist in minimization of disturbance or loss of fixed gear on the community fishing grounds. Developers will hold harmless hired fishermen, owners and vessels from liability or loss by providing insurance policies written by competent marine insurers, listing fishermen and vessels as additionally insured, during all wind power operations.
7. Developers, and subcontractors involved in the installation, maintenance, or removal of offshore infrastructure will give members of the Humboldt County fishing industry, "first right of refusal" for any employment opportunities on local offshore development projects.
8. Developers and their partners agree to work in tandem with the HFMA Board of Directors to minimize any negative impacts to all fishermen, and the Humboldt County fishing industry. These negative impacts include but are not limited to shoreside displacement or loss of fishing infrastructure, conflict arising from increased vessel traffic, hazards to navigation, offshore development operating procedures, catastrophic damage or loss of offshore infrastructure, components or support vessels, groundings, "off station" events, oil or chemical spills, fishing gear loss, displacement of fishing activities on local grounds, etc.
9. Developers will establish a "lost gear replacement fund" to be administered by three HFMA Boardmembers and two developer representatives for the reimbursement to fishermen claiming legitimate, documentable gear loss to offshore development activities.
10. Developers will maintain adequate marine liability and oil spill insurance in amounts necessary to cover any damage to the surrounding environment and businesses and communities reliant on that environment by the partial or catastrophic failure of a developer's equipment and/or by actions of the developer or subcontractor.
11. Developers and operators of offshore development projects, including submarine cables will post geographic locations of equipment, anchoring systems, floating units and cables to NOAA, U.S. Coast Guard notice to Mariners, Nobletec, Rose Point and other navigational software companies. Developers will continue to update the above listed agencies and parties as to any changes of locations of equipment during the total lifespan of the project.

12. Developers, operators and subcontractors shall make available contact information concerning details, location and operations of projects via VHF radio, SSB radio, email and telephone with someone responsible for monitoring and responding to incoming calls on a 24 hour basis.
13. Floating units will be equipped with RACON modules to cause each floating unit to be highly visible on navigational radar.
14. All vessels operating under contract by the developer will be marked with signage, port and starboard with the developer's name in 15" tall lettering.
15. Developers, operators and owners of offshore energy equipment will be required to post performance bonds in adequate amounts to insure payment for the cost of retrieval, removal or decommissioning of all equipment on community fishing grounds for the entire lifetime of each project.
16. Developers must be required to fund legal counsel for negotiating fishermen's associations as a condition for the application and possible later granting of all state permits required for offshore development.
17. All State and Federal permitting agencies involved in site selection for offshore wind power projects, by default, are directly responsible for closing hundreds of square miles of California's fishing grounds to fishermen. Both State and Federal agencies must advocate for and cause the reopening of California fishing areas closed to commercial fishing in the aggregate areas equal to the square mile areas closed to commercial fishing by agency actions in siting offshore wind power projects.

Section 3 — Mitigation Measures

Section 4 — Impact Fees

Section 5 — Contractual Agreements Between Developers, Fishermen's Associations and State Permitting Agencies.

Fw: Littlerock, CA "reservoir"/H2O supply

Gilbert Wirt [REDACTED]

Thu 10/20/2022 04:13 PM

To: PAC [REDACTED] dpc@delta.ca.gov <dpc@delta.ca.gov>;FGC <FGC@fgc.ca.gov>;Krout, Natalie [REDACTED] pspinbox@fire.ca.gov <pspinbox@fire.ca.gov>;OSDS Help@DGS <OSDSHelp@dgs.ca.gov> [REDACTED] [REDACTED] Bugsch, Brian [REDACTED] [REDACTED] ceqaquestions@resources.ca.gov <ceqaquestions@resources.ca.gov>;Save Our Water@DWR <SaveOurWater@water.ca.gov>;cwc@water.ca.gov <cwc@water.ca.gov>;water_news_editors@water.ca.gov <water_news_editors@water.ca.gov>;Donnelly, John [REDACTED]

----- Forwarded Message -----

From: Gilbert Wirt [REDACTED]

To: "askusda@usda.gov" <askusda@usda.gov>; "feedback@ios.doi.gov" <feedback@ios.doi.gov>; "chhsmail@chhs.ca.gov" <chhsmail@chhs.ca.gov>; "askpublicaffairs@state.gov" <askpublicaffairs@state.gov>; "answers@hud.gov" <answers@hud.gov>; "fema-nims@fema.dhs.gov" <fema-nims@fema.dhs.gov>; "fema-r1-info@fema.dhs.gov" <fema-r1-info@fema.dhs.gov>

Sent: Thursday, October 20, 2022, 03:39:26 PM PDT

Subject: Littlerock, CA "reservoir"/H2O supply

You are contacted because, along with other groups, you share administration of the water-shed linked to the Angles National Forest and the region north of the urban/suburban areas of Los Angeles (and that county within that that city sits).

The reservoir southwest of the community of Littlerock, CA, to my knowledge the only water-supply for that large "small-town", is 1/500 capacity (or less) and what wildlife (ducks/fish, that that actually matters on earth for life, versus homo sapiens---that only kill and destroy [evidence shows us]) that lives in that little-pond is in dire-need to keep that little bit of life-providence for their existence to continue.

My status relative to that body of water is of a land-owner (tax payer for over thirty years), in the foothills east of the reservoir; my five acres where my money goes for taxes (and on that lot, trespassed daily by the drug-dealer/derelict-delusional criminal-element of the region, those that reside on the road Arrow Lane, 93543) is in the area termed Juniper Hills east of the Littlerock reservoir.

My vantage does not incorporate the ban on encroachment to view the water-shed, and that reservoir is reachable from a road south of there (that leads to Santiago "staging area" south of the reservoir)--- my experience as a sober/plant-fed/two-degree holding tax payer is that the area of Littlerock and Juniper Hills is made of bad people and drug-user/abusers, and only a partial explanation for the copious dumping of trash and trespassing in the area is available from the hard-data that the area has no water to sustain the masses-of-bad that pass as people in the area.

This letter is to notify your organization ("department") that the area of Littlerock is not safely-habitable for homo-sapiens without a water supply; your one option is to run a water supply network from the "California Aqueduct" that

runs through the
area, from the foothills south of Hwy. 138 towards Llano.

A smart plan is to work on that as soon as possible, using what resources are available from CA, U.S. Departments of Agriculture (and Department of Forestry), and Los Angeles County---
there is no other way to keep the area alive with plants/creatures/homo-sapiens, then to follow that order-of-need cited.

Additionally, emergency deposit of some of that viaduct ("California Aqueduct") water into the mini-pond that used to be a small-lake, called Little Rock Reservoir, should begin immediately.

A Concerned and Spooked Citizen,
Gilbert G. Wirt III

[REDACTED]
[REDACTED]
[REDACTED]

From: Brad Mongeau [REDACTED]
Sent: Tuesday, October 25, 2022 2:09 PM
To: [REDACTED]
Cc: FGC <FGC@fgc.ca.gov>
Subject: Your Intrepretive Center.

Hey Patrick, here's one from the UNBELIEVABLE File: Enjoy

I got a phone call from the Huntington Beach Police Dept this morning and was told that i am not allowed back into your Interpretive Center. Your people lied to the police and told them that i made a disturbance. I asked if they had any video evidence-- because i knew they had NO SUCH evidence. My closest friends have never heard me use profanity. His offense and My crime was that i suggested that they put a fillet table next to their sportfishing area. A fitting accessory for any well established Conservancy wouldn't you think? Then i went on to tell them that the constant bombardment of UV was killing the Calico Bass and the lobster--the guy took offense, imagine that--a decent gentleman like me walks in and sees the imminent danger that the fish are in and has the audacity to say something. The following week i went back and the bass that i had foretold was going to die had been replaced with one that will also die. How do i know it wasn't the same bass--because the new one has a nice bronze color and the existing (dying) one is muted, pale like the one that just died. The carapace on the lobster is bleached from constant bombardment of UV that it will not survive much longer unless it has a place that offers 100% SHADE!!! Btw, i have kept a Koi healthy for the last 34 years!! I have been doing underwater photography for 30 years, i've logged over 150,000 NM in the bight. I know exactly what i am talking about when it comes to fish!

Under the current leadership, what you have at the center is a place where wildlife goes to slowly die, under the guise of a Conservancy no less! I wouldn't care so much if Jiffy Lube had fish die under their care, but for an actual CONSERVANCY to be KNOWINGLY committing this serial abuse is unacceptable! It turns your organization into a farce! Just an another institution the portends to care about nature, but scratch the surface and it shows its ugly, dark side. You people actually solicit DONATIONS under the pretext of being a conservancy, read how your organization touts itself!! Yet you offer sportfishing right at the trail head! How is that not a legal or ethical conflict of interest????

Don't take my word for ANY thing i have said! Please take the time to look into it for yourself. ASK about the lobster and bass!

A couple more things: Please consider this to be a personal request. Since i am no longer allowed on the premises and i still gave grave concern for the lobster and the bass, will you please give them a welfare check for me. I have been sharing their plight with many friends we will be looking forward to your reporting back to me about the deteriorating condition of the fish and lobster. And we would also like to know how that bass (the one that i said was going to die) died while it under their care?

One final request: Would you be kind enough to put my 'denial of access' to the Bolsa Chica Interpretive Center in writing so there will be no misunderstanding by either party. Please make sure that it lists my offences in detail as cause. I plan to share it around and i want it to be precise, leaving nothing out.

I'm retired--call me any time if you'd like, i'll be interesting. [REDACTED]

Brad Mongeau

lovesthesea

PS, Don't hate the messenger, i ain't the one killing your display creatures or fouling the reputation of your institution by filing a frivolous POLICE REPORT in the name of YOUR institution! I am simply a private citizen expressing my concern. We be anxiously waiting for my written 'denial of access' to your property, thank you in advance.

Bears

Kim Hockman [REDACTED]

Tue 11/01/2022 05:24 AM

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

Please stop the cruelty of bow hunting for bears in your state. Yogi should have been helped the moment it was reported that he was injured and suffering. Although I don't live in CA, this made international news. Yogi was well known in the area, and to see pictures of him lounging in a swimming pool are truly heartbreaking. This bear needed help, it was reported, and nothing was done to remove the arrow. Please stop this senseless vicious "sport." The world is killing our animals at an alarming rate. Sick individuals shouldn't be allowed to add to their agony.

Thank you, Kimberly Hockman

Sent from my iPhone

Outlaw bow hunting on bears

Patricia Lind [REDACTED]

Sun 11/06/2022 11:14 AM

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

Cc: Donnelly, John [REDACTED]

Dear Mrs. MillerHenson and Mr. Anthony Williams,

I am be appalled that bears are allowed to be hunted with bows! This is barbaric. Often animals are severely injured and roam for weeks in pain and suffering. No one ensures a bear that has been injured will be put out of his misery!

Df&w just told the neighbors about this neighborhood bear, that was shot in the lungs with the bow, that Df&w would get involved if the bear was to cause a problem for humans and not otherwise. The neighbors had to watch helplessly as the bear moaned and appeared to ask for help.

So these poor animals suffer such cruelty needlessly. It disgusts me how this kind of hunting is still allowed for a sentient being. It also disgusts me that the agency we all pay into to protect our precious wildlife does not seem to protect or care for them except to make money off with hunting licenses.

They do not even ensure that the hunt does not cause needless suffering and that injured animals are tracked and put out of their misery!

Shame on those that allow this. Let me know what citizens can do to put an end to this.

Sincerely

Pat Lind

<https://www.cbsnews.com/amp/news/big-bear-backyard-arcadia-california-arrow-sticking-out-of-it/>

Sent from my iPhone

FW: East Walker River Fishing Regulations - change back to old regulations please

Hello, I'm a CA fly fisherman. I've been fishing the East Walker for a number of years. I'd like to voice my opinion and request that the fishing regulations be changed back to the previous rules on this river (as below), for the following reasons. 1) No bag limit (catch & release only) 2) Artificial lures with single barbless hook only 3) Open year round fishery

The East Walker River is a small river, only 11 miles in CA side and depending on rain, may only have 30-50 cubic feet of water flow. The East Walker River is very susceptible to draught and overfishing. It's a very popular and highly fished river. In years past, when these rules were in place, there seemed to generally be a strong population of large fish in this river. It's one of the only true trophy fish rivers in CA. I've caught a number of 20+ inch fish and seems like I would catch several 16-20 inch fish on each trip with 1-2 20+ inch fish on each trip too. The new rules allowing 2 fish to be kept per day, per fisherman, has depleted the river of the bigger fish. I just went on a trip in late October and didn't catch any fish over 12 inches on 4 days fishing. It takes several years for a trout to grow to be 20+ inches and a zero bag limit ensures these trout stay in the river for the future. Low and warm water levels due to draught compound the challenges the fish population have in this river and their ability to survive. Allowing people to catch and keep fish from this river depletes their populations and is not sustainable. The rules above 1) Zero bag limit 2)

barbless artificial lures and 3) year round fishery is: 1) Good for the fish populations 2) Good for the fishermen who fish this river 3) Good for the local Bridgeport economy (hotels, restaurants and guide services) This is a Win-Win-Win proposition. The current regulation changes on the East Walker River really screwed things up on this river this year and will not get better unless action is taken to go back to a more sustainable set of regulations. Please seriously consider this regulation change for the EWR. Thank you. Stanton Dumin Corona, CA

Stanton Dumin
Riverside County



Lions bears and remedy

larryparker76 [REDACTED]

Tue 11/08/2022 12:58 PM

To: admin@goldgold.com <admin@goldgold.com>;contact@crpa.org
<contact@crpa.org> [REDACTED] CFL@chipotlepublishing.com
<CFL@chipotlepublishing.com>;FGC <FGC@fgc.ca.gov>;jury.courts@trinitycounty.org
<jury.courts@trinitycounty.org> [REDACTED]
[REDACTED] editor@trinityjournal.com <editor@trinityjournal.com>

The spring kit is 11.00 7 9 10 lb 45ACP 1911 A1, bullet mold no longer made (used eBay ??) but they might do a small run if- as they gladly make custom molds

for regular price of mold style and \$100.00 setup fee (2000 year catalog info) The recoil buffer actually smooth's the metal to metal jarring as the slide

comes back and incrementally adds to the spring back force back into battery. As none of my pistols have I every even gotten close to 500 rounds fired even

after 36 years of ownership, your advice ... not real world relevant in my estimation. But as this load is so shootable 155 gr water dropped cast lead over 5

gr Unique taper crimp 1.76 " col I intend to get a little practice every time I go out into the great beyond in Lewiston-while prospecting/hunting. I used a

Remington 1858 99\$ Cabelas 1990 mailed purchase revolver with my Lee Precision 200 gr conical over 8 gr pyrodex to hole beer cans at 20 yards and could place

my shots on them seeing the holes easily at that range/big revelation to me then. Almost smoke and recoil free and dead on sights wise accurate/only loading

I ever used after finding it. Less pyrodex would just dent a tin can an not worth the effort. These lions are a real presence in Lewiston and beyond. I ve

seen a lion chase a fox at the Lewiston cemetery at dusk ignoring my close standing presence as I was alerted to the noiseless pursuit just 20 yards away by

my cat flattening out before me and looking scared as the lion lost the fox threw the narrow passage of the chain-link fence at the cemetery parking area.

Also seen a big male lion at the edge of the ravinen above the white house/beaver pond -rush creek rd, < 100 yards in-as my cat was announcing its presence

following me in the draw while I had a double 12 ga shotgun and it was totally trained on my following cat 30 feet behind me. I spoke claiming my cat and As

far as business went. A candid private look at another lion as it was about to walk over my crossed feet me sittin back to the Deadwood RDditch/calculated

risk on its part-showed an intelligence in those big brown eyes and round pupils. Placid/no trace of anything but complete mastery of the situation. Hey...

This lion came back around and checking my back side was 50 feet up hill of me as I slung my 30 30, reholsterd my 9mm Largo (1911 clone) and hefted my double

12 ga shotgun... I described the encounter to you back when it happened 2005 Mouth of deadwood gulch late afternoon after I had, the previous day shot, a

protesting grey squirrel out of a tree while backing around the 90 foot conifer through rooms of crearing in otherwise 12 foot deep brush just above the

ditchline. the squirrel had seen the lion, unbenonced to me, but I trained my 30 30 with a 113 gr 6,4 gr unique 1200 fps reduced loading scoped rife and

brought it down cleaned it there and returned the following day to clear trail-machettii and bow saw-along the ditch... That lion later came threw the

trailer park so it must have not run off too far and saw my vw 1978 van, ID it in the park and during a freezing night of fog at 2am vocalized in a lions way

a speech that had the imitative cadence of a human...No boby is going to believe this so I went back to sleep as I was dead tired... I saw another first seen

by a black kitten hissing and halloween style broadside at my 73 vw squareback-something was behind me. 10 miles out from Quincy Plumas County-gold dredging

expedition 1984. I checked my Ruger 9 1/2 ich barreled 22 mag revolvers loading and became intent about me. Seeing out by the firelights edge in the road

with-as above again a clear run to me-ambush with force and overwhelming tactical advantage-a lions head-ears flattened-dimly rise up into the light. Dogs

had earlier been going nuts that night at a residence farther in so I fired my gun into the fire and calmed my new black friend that did not run

off,then...who later often went squirrel hunting with me (guts crushed head) and when bear cubs were frolicking out side my tent/Big French Creek-lost it.

Day 2 almost left but firing my pistol it returned down the mountainside to me-a long 15 minute later. It all starts by the edge of the road in TC. So WTF

are you doing today? Larry Parker Lewiston [REDACTED]

Good info to share

Wayne Kotow [REDACTED]

Fri 11/11/2022 12:13 PM

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

Thought this would be good info to share with the Commission.

Regards,

Wayne Kotow
Executive Director CCA CAL

2022 Special Report on Fishing



52.4M

Americans went fishing in 2021

(+4.5% over 2019)



3.7M

First-time participants

43%
were women



8M reactivated anglers but 14M lost participants

(Churn Rate: -18%)



12.9M

Youth (Ages 6–17)
went fishing in 2021

(+14% over 2019)



4.7M

Hispanic participants
fished in 2021

(+7% over 2019)



19.4M

Women went fishing

(+8% over 2010)



1.6M

Female participants
were first-timers



37%

of all anglers
participation were
female, the highest
level on record

99%

 of participants plan to continue fishing in 2022

Black bear protection

Michael Wauschek [REDACTED]

Sun 11/13/2022 04:39 PM

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

We must protect our wildlife they aren't are entertainment of ruthlessly killing them. How killing bear because to bush someone ego vs people that exsurlly hunt for reasons vs ego issues they may have. As well by killing better gen pool they less gen pool. It's bad for all nothing good comes out.

[Sent from Yahoo Mail on Android](#)

Crab traps

Daniel Childs [REDACTED]

Mon 11/14/2022 11:58 AM

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

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hi. I asked this question last year and got a round about response that didn't answer my question. So I'm going to ask again... Why can't people use crab traps in the same manner as crab hoops? For instance, why couldn't I set 2-3 traps out and be required check them every 2 hours and not be allowed to let the soak over night? How can a trap that is being used in the exact same manner as a hoop cause more of an entanglement problem? You could allow people to use traps like hoops and follow the same rules as hoops or give them an extra hour or 2 per soak but not allow any traps to be left over night or past a certain soak time. You can also make a limit on how many hoops/traps one person can set out... make it to where it's only 6 hoops or traps per person. There is a way you can still make traps legal to use and I don't see why that would be an issue so please enlighten me. Plus the state could collect more revenue from the people using traps in the same manner as hoops from the required trap registration stamps.

Thank you for your time and I'm looking forward to your response.

Daniel

Fw: Our article is posted - revised

Russell Walsh [REDACTED]

Wed 11/23/2022 04:47 PM

To: Russell Walsh [REDACTED]

From: Miriam Raftery <editor@eastcountymagazine.org>

Sent: Wednesday, November 23, 2022 2:21 PM

To: 'Russell Walsh' [REDACTED]

Subject: Our article is posted

<https://www.eastcountymagazine.org/sweetwater-drains-loveland-reservoir-dead-pool-level-save-its-ratepayers-money-expense-rural>

If you have a couple of the key documents proving your point about the easement please send – not as a link to a giant file with tons of papers, but as an attached and clearly labeled document or two that I can save and upload links to so everyone can see them.

Thanks, hope this helps.

Miriam