22. Non-Regulatory Requests from Previous Meetings (Marine) (Consent)

Today's Item Information ☐ Action ☒

Consider and potentially act on non-regulatory requests submitted by members of the public at previous meetings.

Summary of Previous/Future Actions

Commission received request

August 13-14, 2025

Today, potentially act on request

October 8-9, 2025

Background

Requests for non-regulatory action are received from members of the public under general public comment. All non-regulatory requests follow a two-meeting cycle to ensure proper review and thorough consideration of each item. Requests received in writing or public testimony during general public comment at the previous Commission meeting are scheduled for consideration at the next regular meeting.

Non-regulatory requests that have been referred to staff, legal counsel, a committee, or the Department for review and recommendation are scheduled for action once a recommendation has been received. Staff recommendations and rationale are developed in consultation with the Department.

Scheduled for Action Today

One non-regulatory request received in August is scheduled for action today. Exhibit 1 provides the staff recommendation and rationale, developed with input from the Department; see Exhibit 2 for the request.

Significant Public Comments (N/A)

Recommendation

Commission staff: Adopt the staff recommendation for the non-regulatory request as reflected in Exhibit 1.

Exhibits

- 1. <u>Summary of non-regulatory request and staff recommendation for request scheduled</u> for action, updated September 23, 2025
- 2. Email and attachments from Anonymous, received July 7, 2025

Motion

Moved by _____ and seconded by ____ that the Commission adopts the staff recommendation for action on the non-regulatory request as reflected in Exhibit 1.

OR

Author: Caroline Newell 1

Staff Summary for October 8-9, 2025

Moved by	and seconded by	_ that the Commission adopts the staff
recommendations for the	e non-regulatory request as refle	ected in Exhibit 1, except for
, for which	the action is	

Author: Caroline Newell 2

California Fish and Game Commission Non-Regulatory Requests for Action — Updated September 23, 2025

Date Received	Name of Requestor	Subject of Request	Short Description	Category	FGC Receipt Scheduled	FGC Initial Action Scheduled	Initial Staff Recommendation
7/7/2025	_	Innkeeper Worms	Request to investigate and regulate the take of innkeeper worms (Urechis caupo) by reviewing current regulations, conducting population impact assesments, considering interim take limits or moratoriums, engaging in public outreach, and collaborating with social media platforms to report and remove posts.	Marine	8/13-14/25	10/8-9/2025	The images provided by the petitioner display that the harvest is within the tidal invertebrate daily bag and possession limit of 35 individuals. Department staff are currently undertaking a broader examination of the recreational tidal invertebrate regulations with a particular focus on the 35 animals per day limit for a number of species. The requester has been advised of the regulation change petition process if they want to pursue an amendment.



Urgent Request to Investigate and Regulate the Take of Innkeeper Worms (Urechis caupo) Along the central California Coast

From	>
Date	Mon 07/07/2025 06:32 PM
То	FGC <fgc@fgc.ca.gov>; Wildlife WHLAB <wilab@wildlife.ca.gov>; Leahy, Ryan ></wilab@wildlife.ca.gov></fgc@fgc.ca.gov>

Date: July 7, 2025

To:

California Department of Fish and Wildlife Marine Region

Subject: Urgent Request to Investigate and Regulate the Take of Innkeeper Worms (Urechis caupo) Along the California Coast

Dear California Department of Fish and Wildlife,

I am writing as a concerned citizen and nature enthusiast to alert you to an emerging and troubling trend: the increased harvesting of **innkeeper worms (Urechis caupo)** along the California coast, particularly in the Bay Area and Central Coast intertidal zones. This species plays a vital role in the coastal ecosystem, serving as an ecological engineer whose burrows are shared by a variety of other marine organisms.

Recently, there has been a sharp rise in the collection of innkeeper worms, driven largely by **viral content on Chinese social media platforms**, especially **Xiaohongshu (Little Red Book)**. These posts glamorize harvesting the worms in large numbers for culinary or novelty purposes. Many show individuals digging up dozens or even hundreds of worms at once, often in sensitive habitats, with little regard for ecological impact or regulation. Most of these harvests happened in Sonoma county (Bodega Bay and Tomales Bay).

This behavior is further exacerbated by the **use of specialized harvesting tools**—such as wide-blade mud shovels, reinforced trenching trowels, and collapsible beach augers—which enable extremely fast and high-volume extraction. These tools allow individuals to excavate large sections of intertidal

mudflat in just minutes, dramatically increasing the speed and scale of collection compared to traditional methods. Observed cases show harvesters filling entire buckets within a single low-tide cycle, visibly damaging sediment structure and disturbing the diverse organisms that depend on innkeeper worm burrows.

This trend bears a concerning resemblance to past exploitation patterns we've seen with **shark finning**, **sea cucumber overharvesting**, and the illegal trade of **fish bladders**—all of which led to severe ecological degradation and were only addressed after irreversible harm had occurred.

As of now, there appears to be little to no formal regulation or tracking of the take of innkeeper worms in California. If left unregulated, this activity could lead to:

- Collapse of localized worm populations
- Disruption of sediment dynamics and dependent species
- Escalation in illegal or unreported harvesting driven by online markets

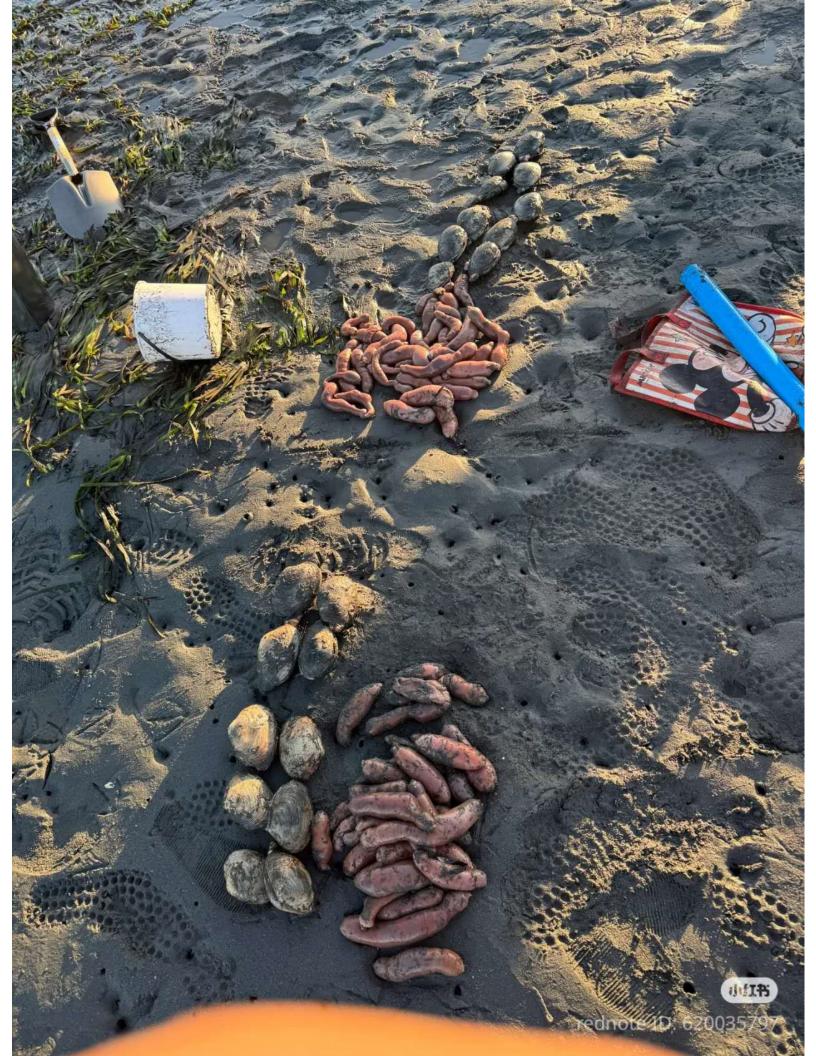
I strongly urge the Department to:

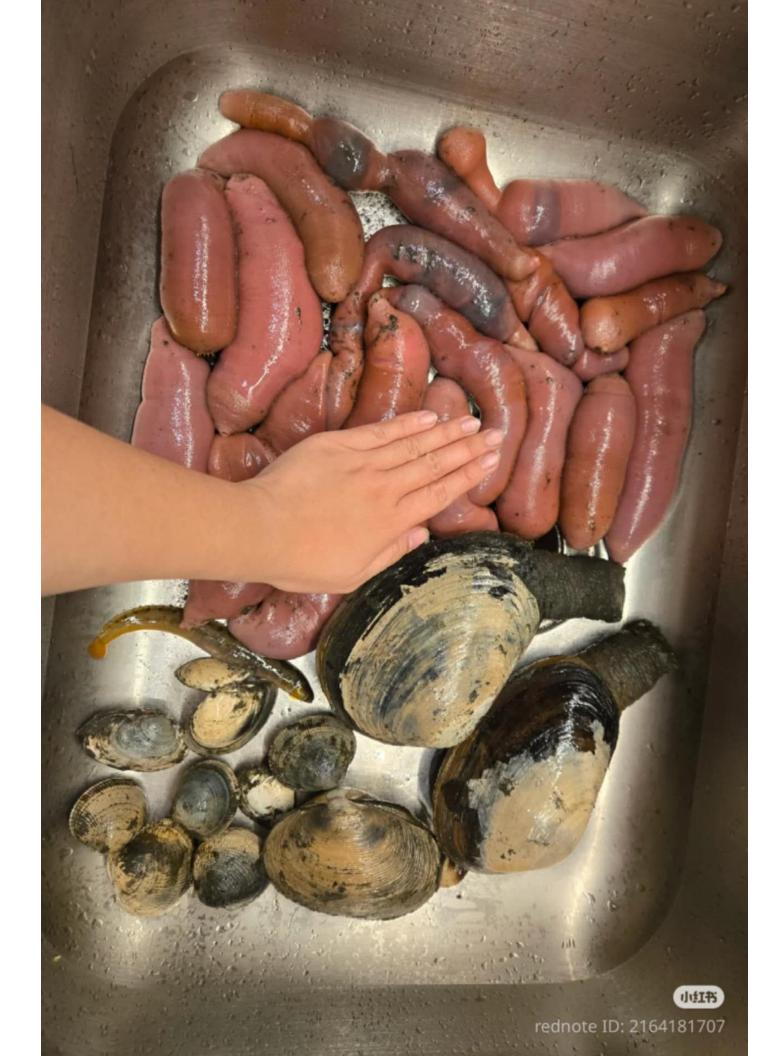
- 1. **Review current regulations** related to the collection of innkeeper worms and other benthic invertebrates.
- 2. Conduct population impact assessments in at-risk intertidal areas.
- 3. **Consider interim take limits or moratoriums** while ecological studies are underway.
- 4. **Engage in public outreach** (including multilingual materials) to educate the public and discourage unsustainable practices.
- 5. **Collaborate with social media platforms** to report and remove posts promoting unregulated harvesting activities.

I am happy to provide **images and translated posts** from Xiaohongshu that illustrate this trend. I hope the Department will act swiftly to prevent another avoidable ecological crisis on our coast.

Thank you for your time and attention to this matter. I welcome any updates on planned actions or opportunities to participate in public discussions.

To avoid being identified by potential	abusive harvesters of Innkeeper worms, I want to remain
anonymous. But you can reach me at	
Sincerely,	





X 1/4

