

Committee Staff Summary for July 16, 2026 MRC

3. Recreational Gear Restrictions for White Shark**Today's Item**Information ☐Action ☒

Review emergency regulations adopted in June 2026 to further protect white sharks during environmental conditions that increase nearshore aggregations and increase likelihood of human interaction with sharks while fishing, discuss rationale, and consider possible next steps, including potential readoption, notice of regulation change, and any modifications.

Summary of Previous/Future Actions

- | | |
|--|---------------------------|
| • Commission discussed and adopted emergency regulations | June 17-18, 2026 |
| • Today review emergency regulations and consider possible next steps | July 16, 2026; MRC |
| • Commission consider potential readoption of emergency regulations | October 13-16, 2026 |

Background

The Department is responsible for managing shark fishing under regulations adopted by the Commission, and tracks interactions with white shark as a federally and state-protected species. At its June 2026 meeting, the Commission adopted emergency recreational ocean fishing regulations in response to projected increases in juvenile white shark presence associated with warmer El Niño conditions.

Specifically, the action established temporary restrictions for fishing from shore or within 1,000 yards of shore from Pigeon Point (San Mateo County) southward to the U.S./Mexico border. The restrictions include; (1) no use of wire or other metallic lines or leaders, (2) no hooks larger than 1.5 inches, and (3) no removal of hooked white sharks from the water. Although these gear types are typically legal for targeting other shark species, they have been involved in recent incidents in which juvenile white sharks were hooked with heavy tackle, resulting in injuries to a swimmer and harm to the sharks, including several mortalities.

The concerns regarding white shark are heightened this year by forecasted warmer-water conditions that shift the preferred range for juvenile white shark northward from Mexico and lead them to stay in California nearshore areas later in the year. The emergency regulations aim to deter illegal targeting of white sharks where nearshore aggregations are known to occur, reduce the likelihood and severity of incidental hooking of white sharks, improve post-release survival by preventing white sharks from trailing heavy gear, and reduce risks to ocean users posed by hooked white sharks or attached wire leaders.

More detailed background is provided in the June 2026 Commission meeting staff summary (Exhibit 1); associated supporting documentation and emergency regulatory language is available online at [Staff Summary and Exhibits for Item 6, June 17-18, 2026 CFGC meeting](#).

Committee Staff Summary for July 16, 2026 MRC

Update

The temporary emergency regulations went into effect on July 3, 2026 and will continue for 180 days unless extended through subsequent Commission action. The emergency regulations prompted media attention and online postings from shore-based shark-fishing enthusiasts and a shark conservation group. Hundreds of comments (individual and form letters) from the angling community, shark conservationists, and the general public were submitted before, during and after the public comment period (see Significant Public Comments). In light of the volume of interest, concerns, and suggestions received, the Department requested that this topic be added to the MRC agenda — the only MRC meeting scheduled prior to the timing required for a potential readoption of the emergency regulations.

Today's meeting provides an opportunity to review and discuss the emergency action, the specific measures adopted in regulation, and considerations for future actions to extend and/or modify the regulations. The Department will present an overview of the implemented measures, the rationale behind them, and implications for recreational anglers targeting other legally harvested shark species (Exhibit 2).

Today's discussion is intended to support MRC consideration and input on next steps, including potential readoption of the emergency regulations and possible initiation of a regular rulemaking beyond the emergency period of approximately one year. To avoid the emergency regulations expiring, readoption would need to occur in October 2026. If MRC recommends, and the Commission approves, pursuing a regular rulemaking to maintain the current measures and/or explore adjustments, a public notice hearing for that action should be scheduled for December 2026 if any significant changes to the regulations are anticipated or February 2027 if there are limited changes; the latter would allow additional discussion at the November 2026 MRC meeting before a Commission decision is made on the contents of a regular rulemaking.

Significant Public Comments

No public comments were submitted specifically for this meeting. However, during the emergency rulemaking comment period — from the emergency adoption on June 17 through the comment period ending Jun 30 — the Commission received written comments supporting the action from just over 450 individuals (31 unique comments and 420 form emails), and opposing the emergency action from 89 individuals (including several “template” letters). Staff transmitted all unique comments to the Department and a set of example form letters and template emails; as a result, the numbers reported here differ from those in the Department presentation (Exhibit 2). A brief overview of the comments received is provided here.

Support: Individual commenters supporting the action, including white shark bite survivors, shark advocates, California residents, and the general public, highlight the need to reduce dangerous interactions between hooked sharks and swimmers, protect apex predators, and close loopholes in the pre-emergency regulations. Many also urged the Commission to consider further restrictions on the use of chum, live bait, mechanical gaffs from piers, and drones for bait deployment. The form letters, the result of an online campaign, continue to be received (over 800 as of July 9). Sample comments are provided in Exhibit 4.

Committee Staff Summary for July 16, 2026 MRC

Oppose: Commenters opposing the action, including shore-based shark anglers, express concern about impact on fishing for other shark species (notably from shore), potential harm of gear on sharks and the environment, and impacts to scientific research. Commenters suggested alternative measures, including increasing enforcement of current law and using education rather than broader restrictions. Others emphasized their right to fish and questioned the emergency justification. Sample comments are provided in Exhibit 5.

Responses: A summary of the comments by theme, and Department and staff responses to comments that were submitted to the Office of Administrative Law, is provided in Exhibit 3. The general responses in Exhibit 3 address all comments received by the Commission.

Recommendation

Commission staff: Recommend that the Commission continue gathering feedback on and results from the adopted regulations; and (1) schedule for October consideration of potentially readopting the emergency regulations, and consider whether to include a possible exception for smaller wire leaders if the regulation is readopted. (2) Delay any recommendation on initiating a regular rulemaking to allow time to learn from the feedback and outcomes of the emergency regulations, which may lead to identifying potential additional modifications, if any, that may be incorporated into a regular rulemaking. (3) Request that the Department provide an update at the November 2026 MRC meeting to inform a potential MRC recommendation regarding a regular rulemaking and the scheduling of public notice.

Department: Continue to gather feedback on and results from the adopted measures, and (1) schedule consideration of emergency readoption in October, and (2) consider scheduling a regular rulemaking notice for consideration in December. Consider a possible exception for smaller wire leaders and the need for modifications, if any, to be enforceable.

Exhibits

1. [Staff summary for Agenda Item 6, June 17-18, 2026 Commission meeting](#) (for background purposes only)
2. [Department presentation](#)
3. [Summary of comments and staff responses to comments](#) regarding the emergency regulations received during the comment period, June 17-30, 2026
4. [Sample comments supporting the emergency measures](#), received June 17-30, 2026
5. [Sample comments opposing the emergency measures](#), received June 17-30, 2026

Committee Direction/Recommendation

Motion 1, Emergency Readoption (October): The Marine Resources Committee recommends that the Commission consider readopting the emergency white shark gear restrictions at its October meeting, either:

- with the current emergency measures *as adopted*; or
- with the following *modification(s)*: _____.

AND [next page]

Committee Staff Summary for July 16, 2026 MRC

Motion 2, Regular Rulemaking (Future): The Marine Resources Committee recommends that the Commission either:

- ***not schedule*** a regular rulemaking at this time and return the topic to MRC for further discussion at the November 2026 MRC meeting; **or**
- ***schedule*** consideration of a regular rulemaking for the December Commission meeting, including the following potential modification(s) to the emergency measures: _____, and return the topic to MRC for further discussion at the November 2026 MRC meeting with an update and any recommended measures to incorporate into a regular rulemaking.

Staff Summary for June 17-18, 2026
For Background Purposes Only

6. Recreational Gear Restrictions for White Shark (Emergency)

Today's Item

Information ☐

Action ☒

Consider adopting emergency regulations to further protect white sharks during environmental conditions that increase nearshore aggregations of white sharks and increase the likelihood of humans interacting with sharks while fishing, by prohibiting specific gear types when recreational fishing from shore or within 1,000 yards of shore.

Summary of Previous/Future Actions

- **Today discuss and consider adopting emergency regulations** **June 17-18, 2026**

Background

White sharks (*Carcharodon carcharias*) are an important apex predator in the marine ecosystem and are protected from take under state and federal fishing regulations. Juvenile white sharks commonly aggregate in nearshore waters of southern California and have not been documented north of Santa Cruz.

Recently, several incidents have occurred in which juvenile white sharks were hooked by pier and shore anglers using heavy fishing gear, such as wire leaders and large hooks; this gear is commonly used to legally target other shark species but can also be used to illegally target white sharks. These fishing interactions can injure sharks and have resulted in the death of at least three white sharks in 2026. A previous incident in 2014 also involved a swimmer being bitten by a white shark that had been hooked by an angler on a pier.

This year, a strong El Niño event is expected to warm coastal water and increase the presence of juvenile white sharks in California coastal waters, making the sharks more susceptible to being hooked and significantly heightening the potential for human-shark interactions involving hooked sharks. Given these conditions, there is an immediate need to deter illegal targeting of white shark, improve survival of incidentally hooked white sharks, and reduce risk of incidents in which hooked sharks may pose a hazard to ocean users.

Based on the recent events and the anticipated increase caused by the upcoming El Niño event, the Department is requesting the Commission amend recreational ocean fishing regulations through the emergency rulemaking process to further protect white sharks from illegal take and incidental harm and to help prevent incidents between ocean users and hooked sharks (see Exhibit 1 for additional details).

The draft emergency amendments would require that any white sharks caught be released immediately and prohibit removing hooked white sharks from the water. The amendments would also prohibit the use of wire or other metallic lines or leaders and hooks larger than one and one-half inches in maximum inside measurement when fishing in ocean waters south of Pigeon Point (San Mateo County, 37° 11' N. lat.), the area where juvenile white shark aggregations are documented to occur and are expected to increase. For additional background, supporting information, and proposed regulatory text, see exhibits 2 and 3.

Staff Summary for June 17-18, 2026
For Background Purposes Only

Significant Public Comments (N/A)

Recommendation

Commission staff: Adopt the proposed emergency regulation for recreational gear restrictions for white sharks as recommended by the Department.

Department: Adopt the emergency regulation described in exhibits 2 and 3.

Exhibits

1. [Department memo, received June 2, 2026](#)
2. [Draft emergency statement and informative digest, dated May 13, 2026](#)
3. [Draft proposed regulatory language](#)
4. [Draft economic and fiscal impact statement \(STD 399\)](#)
5. [Department presentation](#)

Motion

Moved by _____ and seconded by _____ that the Commission finds, pursuant to Section 399 of the California Fish and Game Code, that adopting the proposed emergency regulation is necessary for the immediate conservation, preservation, or protection of birds, mammals, fish, amphibians, or reptiles, including, but not limited to, their nests or eggs and is necessary for the immediate preservation of the public peace, health and safety, or general welfare.

The Commission further determines, pursuant to Section 11346.1 of the Government Code, that an emergency situation exists and finds the proposed regulation is necessary to address the emergency.

Therefore, the Commission adopts the emergency regulation to amend sections 28.06 and 28.65, as discussed today.



Recreational Gear Restrictions for White Shark

July 16, 2026

Presented to:

Marine Resources Committee
CA Fish and Game Commission

Presented by:

John Ugoretz
Pelagic Fisheries Program Manager
Marine Region



Emergency Regulations

- Prohibit removing hooked white sharks from water and requiring immediate release
- South of Pigeon Point (San Mateo County):
 - **Prohibit** the use of **wire lines and leaders** or **hooks > 1.5" in maximum inside measurement** when:
 - **Angling from shore** (including beaches, banks, piers, jetties, breakwaters, docks, and other man-made structures connected to the shore)
 - **Angling within 1,000 yards of mean high tide line**



Photo: Dr. Chris Lowe



Comments in Favor

- 5 Commenters at the emergency adoption hearing
 - Multiple recreational fishing representatives
- 67 Written comments after emergency adoption
 - Supported protection of white sharks
 - Recommended other restrictions
 - Prohibiting chum and live bait
 - Further limit hook size
 - Prohibiting Kevlar leaders and limit total line test
 - Prohibit the use of gaffs on piers
 - Prohibit the use of drones to place bait offshore



Comments in Opposition

- 61 written comments received after emergency adoption
 - White sharks already protected
 - Impacts to fishing for legal species:
 - mako, blue, thresher, soupfin, sevengill, sixgill, smoothhound, prickly, and leopard sharks as well as bat rays
 - Forced use of smaller hooks may cause gut hooking
 - Fish will break off and trail monofilament
 - No input from anglers



Mako and Blue Sharks

- Extremely rare to be taken from piers or beaches
- Unlikely to be taken within 1,000 yards of shore
- Not significantly impacted by the emergency regulation



Photo: CDFW



Thresher Sharks

- Taken from piers and beaches, though majority taken offshore
- Niche fishery, relatively few participants statewide
- Can be taken with monofilament, though larger individuals may break off
- Large hooks unnecessary



Photo: CDFW



Smoothhound Sharks

- Smaller sharks (largest 4-5')
- Readily landed without wire leader and with small hooks



Photo: J. Seiler, CDFW



Sevengill, Sixgill, and Prickly Sharks

- Occasionally taken from piers and beaches
- Niche fishery, relatively few participants statewide
- Smaller sharks can be taken without wire leader
- Larger sharks more likely to be lost



Photo: A. Mutti CDFW



Soupfin and Leopard Sharks

- Taken primarily from beaches and jetties, in particular within bays
- Can be taken with monofilament, though larger individuals may break off
- Large hooks unnecessary



Photo: A. Mutti CDFW



Bat Rays

- These species are sometimes taken off piers and beaches
- Wire leader not needed to land
- Large hooks not needed to catch



Successful Shark Angling

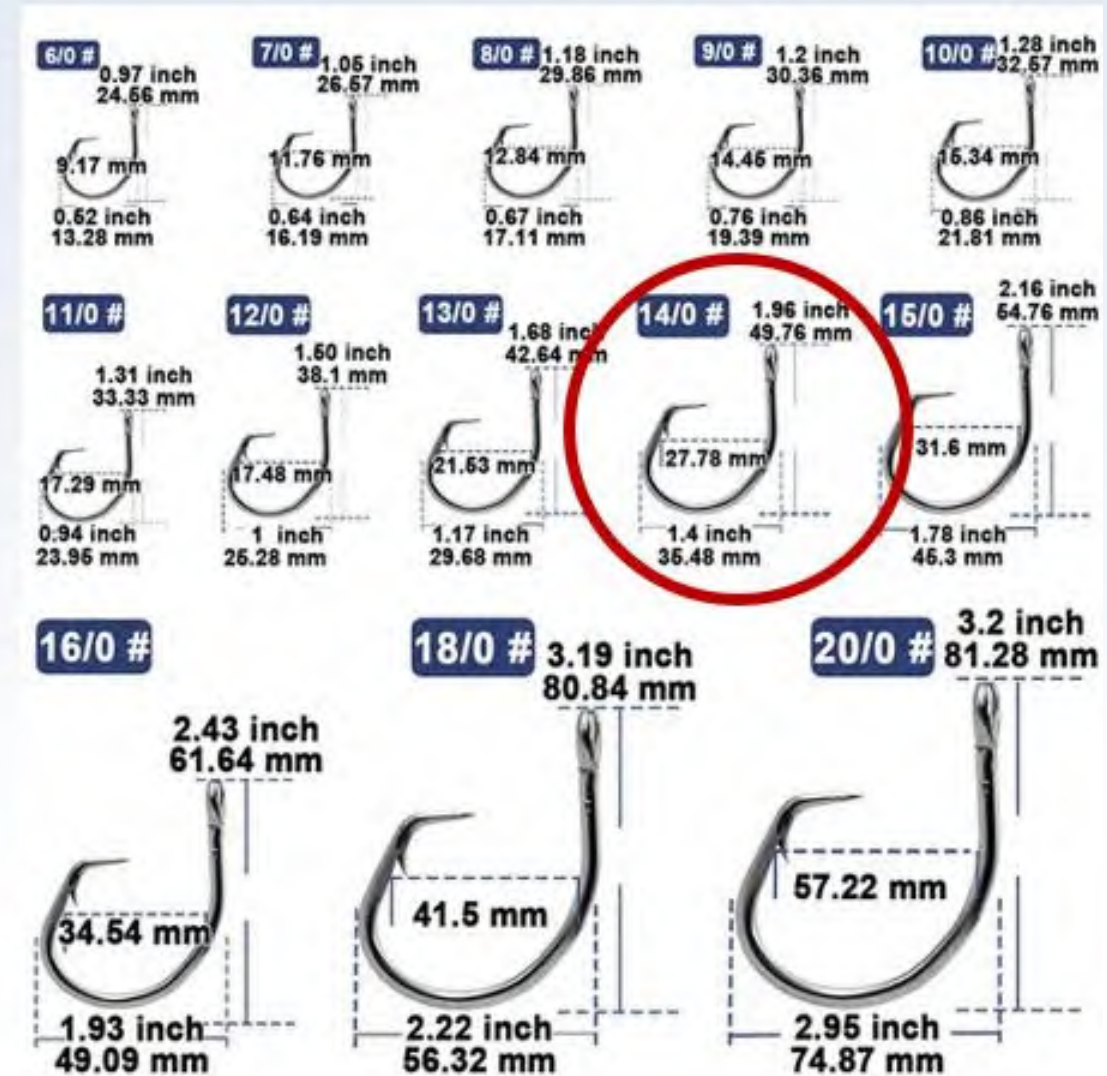
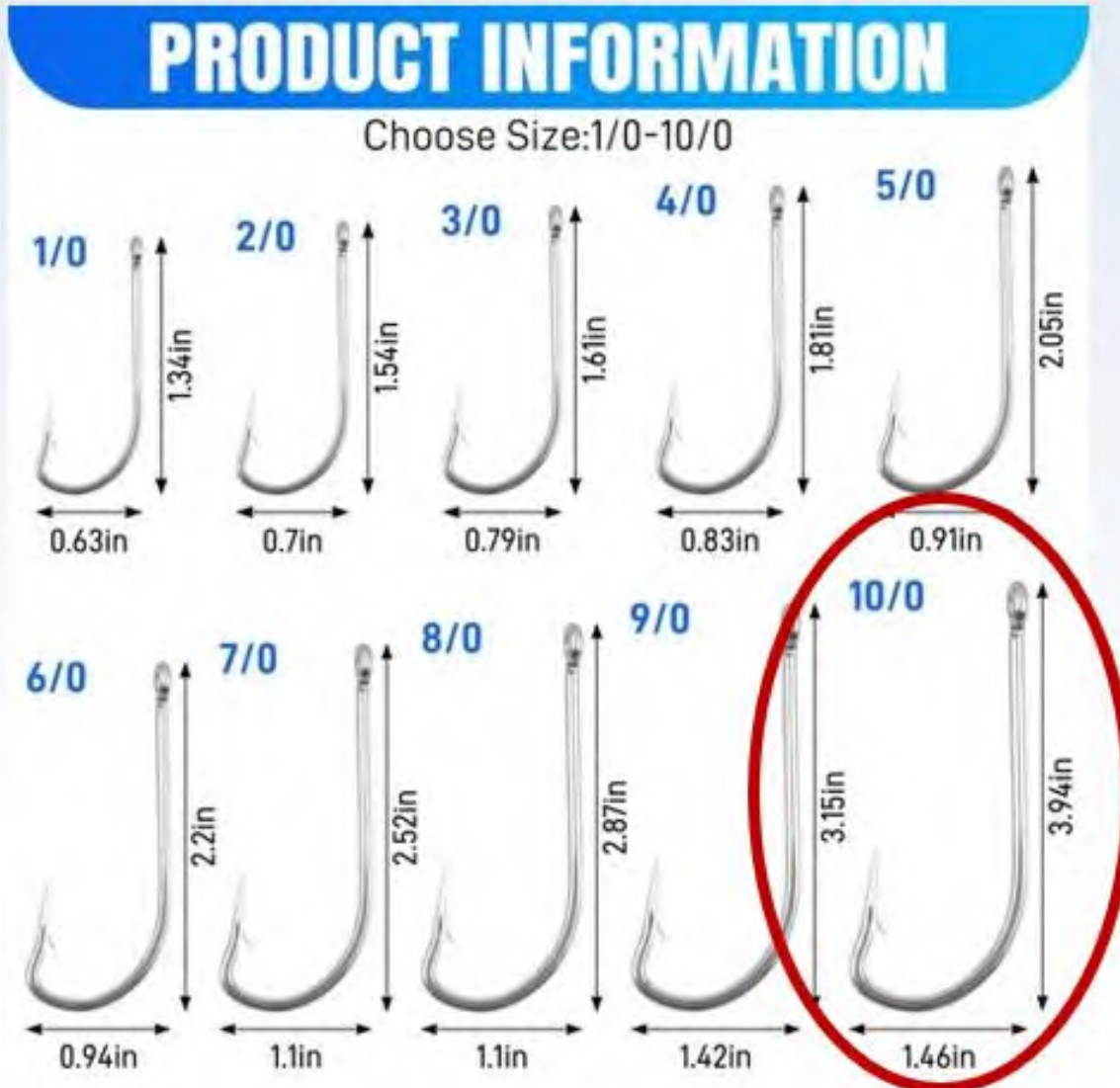


**SoCal sharks on the
Paddleboards!**

Video Credit: @REMYLEWIS17
<https://www.instagram.com/reel/DaAxOhHB4Al/>



Hook Size



Images from Amazon.com



Hook Examples



CDFW Photo



CDFW Photo

10/0 J-Hook and 14/0 Circle Hook ~ 1 ¼" Inside Diameters



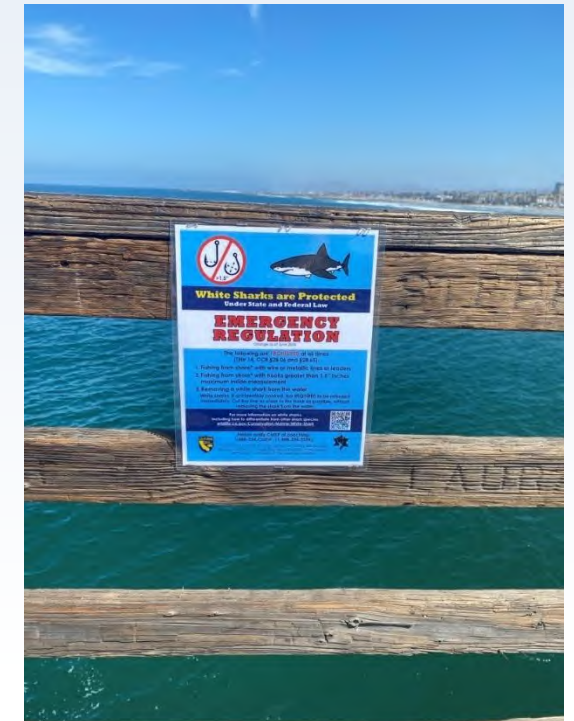
Harm to the Environment

- Small hooks lead to gut-hooking
 - Previous slides demonstrate these are not small hooks
 - More damage from hooks attached to wire that doesn't break
- Long trailing monofilament
 - More likely to break between hook and edge of mouth
 - Trailing wire will not break if entangled



Next Steps

- Emergency regulations were just implemented
- Continue to gather feedback and results
- Consider emergency readoption in October
- Potential rulemaking notice in December
 - Consider possible exception for smaller wire leaders
 - Need to define
 - Needs to be enforceable



CDFW Photo

Thank You



AskMarine@Wildlife.ca.gov

California Fish and Game Commission Emergency Regulations for Title 14, Section 28.06, Shore Fishing Gear Restrictions and White Shark Take 2026

General Responses to Comments Received During the Public Comment Period

Comments received during the public notice period for the Shore Fishing Gear Restrictions and White Shark Take Emergency action were grouped based on similarity in topic or concern. At the June 17, 2026 Fish and Game Commission (Commission) meeting, 5 oral comments were received in support of the proposed regulation change.

Between June 17 and the end of the comment period on June 30, 2026, the Commission received 451 comments in support of the emergency regulation (including 31 unique comments and 420 form letters), and received 89 comments opposing the action (including several template letters).

Additional comments were received outside the time period allowed by Government Code section 11349.6 (including nearly 800 form letters in support and 4 individual comments opposed). The Commission is providing general responses to all received comments below.

General Responses to the public comments on the proposed regulations were focused on the following topics:

Support for Regulation Change

Numerous commenters expressed support for the proposed regulations and encouraged the Commission to take further actions to protect other shark species. These commenters highlighted the potential for dangerous interactions between hooked sharks and swimmers, the need to protect apex predators, and the loopholes provided by the current regulations. They requested additional restrictions, including prohibiting the use of all chum and live bait in the water, further limiting hook size, prohibiting the use of Kevlar leaders and limiting total line test, prohibiting the use of mechanical gaffs on piers, and prohibiting the use of drones to place bait offshore.

Response: The Commission thanks the commenters for their support. Recommendations to further restrict fishing for other species of shark and additional measures to restrict shark fishing gear, chumming, and other activities are outside the scope of the emergency. The emergency regulation is intended not only to help prevent the take of white shark during a period when a larger number of white sharks are expected to be present, but also to help reduce the potential for interactions with swimmers and hooked sharks near beaches and piers. The Commission feels the emergency regulations will adequately meet the need, and that the additional recommendations could be considered in future rulemakings if needed.

Enforcing Current Regulations

Commenters noted that white shark take is already prohibited, and that if Department of Fish and Wildlife enforcement staff enforced the current law, the emergency regulation would not be necessary. They also state that the emergency regulations will not address the current problem due to the lack of enforcement.

Response:

The Commission acknowledges that existing regulations prohibit the recreational take of white shark (Title 14, California Code of Regulations, Section 28.06) and California law prohibits placing any shark bait, shark lure, or shark chum into the water within one nautical mile of any shoreline, pier, or jetty when a white shark is either visible or known to be present (California Fish and Game Code Section 5517). These restrictions, however, require substantiating evidence that an individual was intentionally seeking to take a white shark, or had knowledge that a white shark was known to be present. Given that several other shark and ray species may be taken using the same fishing gear, it is very difficult to successfully enforce these restrictions, as evidenced by multiple highly publicized events on both social media and news media platforms this year. Additionally, the intent of the emergency regulations is not only to help protect white sharks, but to help prevent interactions between any species of hooked sharks, whether intentional or accidental, that are connected with metal lines to a rod on the shoreline or a pier with nearby swimmers and other ocean users. Eliminating the use of wire leaders and lines and limiting the size of hooks used will substantially decrease the potential for a large shark to remain on the line and harm an ocean user, while being fought by an angler, or for a swimmer to become entangled in or harmed by the wire.

Impact on Fishing for Other Shark Species

Commenters expressed concerns that prohibiting the use of wire/metallic leaders would unnecessarily impact legal fishing for a variety of other shark species, including mako, blue, thresher, soupfin, sevengill, sixgill, smoothhound, prickly, and leopard sharks as well as bat rays. Many commenters indicated a concern that this amendment is a coastwide gear ban on all species of shark.

Response:

The Commission recognizes that prohibiting the use of wire and metallic lines and leaders may make it more difficult to successfully land other large shark species taken from the shore or within 1,000 yards of shore. Mako and blue sharks are very rarely taken from the shoreline or piers, and the impact of the emergency regulations on fishing for these species would be extremely low. While catches of these species from piers is known to occur, Department sampling in the California Recreational Fishery Survey has not documented a single occurrence of either species in the last 20 years. Smoothhound sharks, both brown and gray, have a maximum length of between 4 and

5 feet and are much smaller on average. These species can be readily landed without the use of wire leaders. Thresher sharks are taken from piers in Southern California. While these sharks can be larger, their mouths and teeth are much smaller than similarly sized species, and they have been known to be taken without wire leaders. Sevengill, sixgill, and prickly sharks are far less common and only taken by a very small number of anglers fishing from beaches and piers. While larger individuals would be unlikely to be successfully landed without wire leaders, the overall impact of eliminating this take would not significantly change the total statewide take. The majority of sevengill shark recreational fishing effort occurs in San Francisco Bay, which is not part of this emergency rulemaking. Prickly sharks are associated with colder, deeper water, and the geographic locations in which a shore-based angler is likely to encounter one are extremely limited. Additionally, there is no active fishery for this species, and catches are extremely rare. Smaller leopard and soupfin sharks can be taken using monofilament leader and are regularly landed successfully without the use of wire or metallic leaders. Larger individuals will likely break a monofilament leader and may not be successfully landed. While this may reduce the total take of these species, the ability to catch them will not be eliminated. Bat rays do not have sharp teeth like the shark species and can be readily landed with monofilament leaders even at very large sizes.

The Commission notes that the regulation is limited to the shoreline (including piers, jetties, and other manmade structures attached to the shoreline) and out to 1,000 yards from the mean high tide. Additionally, the regulation is not statewide and extends only from Pigeon Point (San Mateo County) to the U.S. / Mexico international border.

Potential Harm of Gear on Sharks and the Environment

Commenters claimed that if wire or metallic leaders are not allowed, fish with sharp teeth will break off and be left with trailing monofilament that could become entangled and cause the fish to suffer and die. Some commenters also expressed concern for increased amounts of monofilament remaining in the ocean creating entanglement hazards for marine mammals, sea turtles, seabirds, and fish. Other commenters stated that the hook size limit would lead to smaller hooks being swallowed by fish (gut hooking) causing them further harm after breaking off.

Response:

The Commission notes that allowing larger shark species to quickly break off is the intent of the regulation. In the case of lighter test line, where fish with sharp teeth would easily sever the line, it will not leave long trailing monofilament but rather a very short piece only the length between the hook in the fish's mouth to their teeth. Heavier test line would break in the same manner when catching larger sharks, with the sharp teeth breaking the line near the hook in the shark's mouth. This is not anticipated to lead to long trailing monofilament that would either become entangled or later become an

entanglement risk to other species. Scientific literature supports leaving hooked sharks in the water and cutting the line to limit fight time and avoid additional injuries and indicates that even gut-hooked fish survive better when the line is cut (Fobert, et al., 2009, Horton, et al. 2023, Gallagher, et al. 2017).

Conversely, wire or metallic leaders and line are unlikely to be broken by even larger sharks' teeth. In this case, it is more likely that the attached monofilament line would break either due to the shark's weight or through abrasion against the shark's skin, leaving the wire leader and a portion of monofilament line attached to the shark to potentially become entangled.

The regulation limits hook size to less than 1.5" maximum inside measurement. At this size, all but the very largest species would not be likely to swallow the hook. In the case of larger species, such as a very large leopard shark or a large thresher shark, if the shark breaks off the line the hook would eventually break down or be expelled and, because it would not be larger than 1.5", would be unlikely to cause significant harm and are expected to be shed within 1 year (Bègue, et al., 2020). Hooks larger than 1.5" would be more likely to cause significant internal damage, especially if connected to a wire leader that does not break in the case of a shark swallowing a hook and allows the angler to continue fighting the shark with the hook embedded in the shark's gut.

Impact to Scientific Research

One commenter stated that the regulation would eliminate research catch, which requires steel leaders to conduct.

Response: White shark take for scientific research is allowed under the authority of a Scientific Collecting Permit pursuant to Section 1002, California Fish and Game Code, and as referenced in Title 14, California Code of Regulations, Section 28.06. Scientific Collecting Permits specify the gears allowed and can include the use of wire or metallic lines and leaders. This type of activity, as well as scientific research for other species, is not considered recreational fishing and is not constrained by the emergency regulation.

Constitutional Right to Fish

Two commenters indicated that the emergency regulation was unconstitutional and that anglers had the right to use any gear necessary to take legal species.

Response: The California Constitution does not provide an absolute right to fish. Article 1, Section 25, of the California Constitution states "The people shall have the right to fish upon and from the public lands of the State and in the waters thereof...provided, that the legislature may by statute, provide for the season when and the conditions under which the different species of fish may be taken." In 1918, the California Supreme Court considered whether a law providing for the licensing of fishermen was unconstitutional because it violated Article 1, Section 25. The court rejected the

argument, finding that the provision authorizing the Legislature to fix the seasons and conditions under which fish are taken was intended to leave the matter in under the Legislature's discretion [Paladini v. Superior Court (1918) 178 Cal. 369]. As recently as 1995, a court reaffirmed the qualified, not fundamental, right to fish and that the language of the State Constitution was not intended to curtail the ability of the Legislature (or the Fish and Game Commission through legislated authority) to regulate fishing [California Gillnetters Association v. Department of Fish and Game (1995) 39 Cal.App.4th 1145]. Section 25 must be read in connection with article 4, section 20 (formerly section 25½), which states that the Legislature may enact appropriate laws for protection of fish and game, and may delegate to the Fish and Game Commission such powers relating to protection and propagation of fish and game [Ex parte Parra (1914) 24 Cal. App. 339, 340]. In that respect, the California Supreme Court found it "most apparent" that the purpose of (now) article 4, section 20 "was to clothe the Legislature with ample power to adequately protect the fish and game of the state." Further, the California Supreme Court has long declared that the power to regulate fishing has always existed as an aspect of the inherent power of the Legislature to regulate the terms under which a public resource may be taken by private citizens [In re Phoedovius (1918) 177 Cal. 238, 245-246; People v. Monterey Fish Products Company (1925) 195 Cal. 548, 563]. This regulatory power clearly includes the regulation of the tackle used to catch fish as found throughout Commission regulations.

Use Education Rather than Regulations

Several commenters recommended that California implement mandatory education programs for shark anglers, similar to those found in some east coast states, rather than implementing new gear restrictions.

Response: While educational programs could increase angler awareness of existing regulations and help ensure that accidentally hooked white sharks are successfully released, they would not achieve the primary purposes of the emergency regulation. Importantly, people who are intentionally targeting white sharks and illegally taking them would not be expected to change this behavior with educational programs. Also, an important component of the need for these regulations is to help reduce the potential for a large, hooked shark attached to a wire or metallic line to bite a person in the water, as occurred in 2014, or for a swimmer to become entangled in the line and injured by it. Educational programs would not reduce this potential, without also removing the ability to use wire or metallic lines or leaders.

Emergency Justification

Several commenters stated that the emergency finding relies heavily on a limited number of incidents. Some incidents are several years old and do not warrant an emergency regulatory change. Commenters also state that the projected climate

changes are not confirmatory and do not justify emergency regulations and projections regarding future conditions.

Response: The Commission's determination that an emergency regulation is warranted is supported by current environmental and biological conditions that present an immediate threat to public safety. There is evidence of a significant rise in shark activity in southern California waters this year. This pattern aligns with the established scientific understanding that juvenile white sharks migrate into Southern California during the summer months seeking warmer waters. Warm-water events historically intensify their presence and shift their range northward. Additionally, the 20 juvenile white sharks caught in a single day off the Hermosa Beach pier demonstrate an unusual and concentrated increase of sharks into highly populated recreational and fishing zones. Finally, NOAA has declared that El Niño conditions exist at this time and the forecasted warm-water conditions for the remainder of the year support the expectation that shark presence will continue to rise. Delaying action until a standard rulemaking is completed would leave the public exposed to documented and escalating risk.

Literature Cited

- Bègue M., E. Clua, G. Siu, C. Meyer. 2020. Prevalence, persistence and impacts of residual fishing hooks on tiger sharks. *Fisheries Research*. 224.
<https://doi.org/10.1016/j.fishres.2019.105462>
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- Gallagher, AJ, N. Hammerschlag, A.J. Danylchuk, and S.J. Cooke. 2017. Shark recreational fisheries: Status, challenges, and research needs. *Ambio*. 46(4):385-398.
<https://pmc.ncbi.nlm.nih.gov/articles/PMC5385669/>
- Horton, T.W., O. Exeter, F. Garzon, C. Gordon, L.A. Hawkes, A. Hood, D. Righton, J.F. Silva, and M.J. Witt. 2023. Best practices for catch-and-release shark angling: current scientific understanding and future research. *Fisheries Research*. 267.
<https://doi.org/10.1016/j.fishres.2023.106760>

California Fish and Game Commission
Sample Comments Supporting White Shark Emergency Regulations
June 2026

1. [Email from David McGuire, Director, Shark Stewards](#), received June 16, 2026
2. [Email from Maria Korcsmarcos](#), received June 22, 2026
3. [Email from Kinga Phillips, journalist, Executive Producer and Host of Shark Week](#), received June 23, 2026
4. [Letter from nine researchers from University of San Diego School of Law, University of Miami, City University of New York, New York University, and Indiana University Indianapolis](#), received June 23, 2026
5. [Email from Grace Van de Pas](#), received June 23, 2026
6. [Letter from Maria Brown, Board Vice President, Greater Farallones Association](#), received June 24, 2026
7. [Email from Sofya Sadiq](#), received June 24, 2026
8. [Email from Jennifer Conley](#), received June 30, 2026
9. [Email from Dominique Cano-Stocco](#), received June 30, 2026
10. [Email from Christopher Jones](#), received June 30, 2026
11. [Email from Nick DeNezzo, Marine Conservation Artist, Nicholas DeNezzo Fine Art](#), received June 30, 2026

From: David McGuire
Sent: Tuesday, June 16, 2026 8:42 PM
To: FGC
Subject: Approve: Recreational Gear Restrictions for White Shark (Emergency) Item 6 June 17, 2026
Categories: Exhibit

Dear President Sklar and California Fish and Game Commissioners,

This letter is to urge your support of the proposed Finding of Emergency and Statement of Proposed Emergency Regulatory Action Emergency Action to Amend Sections 28.06 and 28.65 Title 14, California Code of Regulations Re: Recreational Gear Restrictions for White Shark

With the imminent El Niño in 2026, a shift in range of white shark demography associated with warming waters and the public safety risk posed by anglers targeting sharks using gear that is harmful to protected white sharks, habituates sharks near public beaches and piers, we urge you to approve of the proposed emergency regulation by the California Department of Fish and Wildlife with additional restrictions involving mechanical gaffs, drine baiting and use of attractants for sharks by recreational fishing.

Shark Stewards has been tracking shark catch in Southern California in social media and documented that fishermen are targeting white sharks under the guise of fishing for other sharks, despite its illegality under California law AB 2109. Under [California Code of Regulations \(Title 14, § 28.06\)](#) and Fish and Game Code Section 5517, white sharks may not be taken or possessed at any time, except with a special scientific or educational purposes.

However, a loophole in the law only makes it illegal to fish for sharks only “when white sharks are near.” This loophole gives fishermen targeting white sharks an out, while also allowing fishermen to harm a protected species with impunity. Social media rewards this illegal behavior. Since AB 2109 came into law we have documented more than thirty instances of fishermen catching white sharks on social media. Dead white sharks have washed up on beaches with evidence of fishing gear and damage at [Torrey Pines](#), [Carlsbad](#) and [Santa Cruz](#). The shark in the instagram post below by Terrafirmtackle was caught twice and shows clear signs of gill damage.

It is strictly **illegal to intentionally fish for, catch, or possess white sharks** in California waters. Governed by the California Department of Fish and Wildlife (CDFW), these protections require anglers to immediately release any white shark that is accidentally hooked, without removing it from the water

The news story of the young man widely celebrated on the news and social channels for releasing a white shark on April 10 at the Hermosa Pier, followed by a [targeted team effort Saturday](#) is a glaring example of this loophole. The excuse that they thought they were catching Mako sharks is absurd. We request an investigation into this incident and citations issued to the perpetrators. A witness La Playita restaurant owner Harold Cohen observed five sharks being caught. With over 20 sharks reported caught it is likely that one shark was caught and released more than once. Fighting a shark and bringing it to the pier level to cut the line exhausts the animal and threatens its survival. These sharks are gaffed to raise them and cut the line, injuring sensitive gills or rostrum. Leaving hooks and lines in the jaw impair their feeding and risks infection.

Attracting and catching large sharks nearshore also puts the public safety at risk. On the morning of Saturday July 5, 2014, distance swimmer Steven Robles was bitten by a 7-to-10-foot juvenile white shark while swimming off the Manhattan Beach Pier in California. The shark, which had been hooked by a fisherman for 40 minutes before the line was cut. The agitated shark bit Robles in the torso and hand before releasing him, causing extreme injury. Other near misses have been documented with sharks passing close beneath surfers at public beaches where fishing is occurring.

SHARK STEWARDS IS PETITIONING THE CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE AND THE FISH AND GAME COMMISSION TO INCREASE REGULATION FOR THE PUBLIC SAFETY AND PROTECT THREATENED SPECIES.

We support a regulation for all public piers and beaches in California that will:

prohibit chum and live bait in the water;

limiting hook size to no greater than 1/0;

prohibit heavy wire or kevlar leaders;

prohibiting line strength greater than 60 test;

prohibit mechanical gaffs on piers;

prohibit the use of drones to place bait offshore;

Banning nearshore shark attractants (not just for white sharks), drone fishing and banning shark fishing entirely has been applied in towns in Florida and South Carolina to protect the public safety. As a leader in shark and marine conservation, California can demonstrate sound policy that allows recreational and subsistence fishermen to fish safely and responsibly.

Linked here is a [petition](#) link with public support for this emergency regulation.

Thank you for your comments and consideration.

David McGuire, MEH

Director, Shark Stewards

m:415 350-3790 | e:sharkfilms@gmail.com | w:www.sharkstewards.org

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Shark Stewards is a non-profit project of the Earth Island Institute

From: maria korcsmaros [REDACTED]
Sent: Monday, June 22, 2026 6:38 PM
To: FGC
Subject: Fishing regulations for sharks

Categories: Exhibit

Hello,

I am a shark survivor, my incident was in Corona Del Mar state beach on May 29th, 2016. Another friend of mine , shark survivor, Steven Robles was bitten in July 4th in 2014 after a pier fisherman hooked a great white and it broke the line.

We would like to thank you for your emergency regulations just passed last week and encourage you to continue protecting the general public by enforcing this as strictly as you can.

Also looking into chumming near shore to attract fish but in all likely attracts sea lions and hence bigger predators like sharks.

My contact information below:



Maria Korcsmaros

Race Director:

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.run4sharks.org%2F&data=05%7C02%7Cfgc%40fgc.ca.gov%7Ccccb75a490a54baa125e08ded0c805f3%7C4b633c25efbf40069f1507442ba7aa0b%7C0%7C0%7C639177754703425321%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIslIAiOiJXaW4zMilslkFOljoitWFBpClslldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=prh%2Blqx2dTmUsUVQcfPONM7vTx%2BEjd3R89Md55Po9xs%3D&reserved=0>

SoCal Chair Shark Stewards:

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.sharkstewards.org%2F&data=05%7C02%7Cfgc%40fgc.ca.gov%7Ccccb75a490a54baa125e08ded0c805f3%7C4b633c25efbf40069f1507442ba7aa0b%7C0%7C0%7C639177754703455693%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIslIAiOiJXaW4zMilslkFOljoitWFBpClslldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=n9smFNTEL%2BqSbTrGwouzywiaBd2p%2BhU92rSZ0%2FABL1s%3D&reserved=0>

Owner: Kissed By a Shark Wellness

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.kissedbyasharkwellness.com%2F&data=05%7C02%7Cfgc%40fgc.ca.gov%7Ccccb75a490a54baa125e08ded0c805f3%7C4b633c25efbf40069f1507442ba7aa0b%7C0%7C0%7C639177754703455693%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIslIAiOiJXaW4zMilslkFOljoitWFBpClslldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=n9smFNTEL%2BqSbTrGwouzywiaBd2p%2BhU92rSZ0%2FABL1s%3D&reserved=0>

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ZHMWQoxo9DI%3D&reserved=0



From: Kinga Philipps
Sent: Tuesday, June 23, 2026 7:01 PM
To: FGC
Subject: Public Comment IN SUPPORT of Emergency Regulations: White Sharks

Categories: Exhibit

To the Commissioners and Department Staff,

I am writing as a California resident, diver, spear fisher and ocean/shark conservationist to express my full and unreserved support for the emergency regulations passed unanimously on June 17, 2026, which ban wire leaders and restrict hook sizes to a maximum of 1.5 inches inside measurement from Pigeon Point south.

While certain recreational angling groups have publicly criticized these restrictions under the guise of "animal welfare" and "constitutional rights," their arguments fundamentally misrepresent the reality of land-based shark fishing, modern tackle engineering, and the original intent of California's legal framework. I urge the Commission to uphold these protective measures permanently and to address critical omissions regarding modern technology.

I would like to submit the following points and scientific evidence for the official record:

1. Large Hooks and Wire Leaders Are Solely Necessary for Prohibited Apex Predators:

Opponents argue that restricting hook size to 1.5 inches and banning wire leaders will cause incidental harm to smaller, legally targeted species like leopard sharks (*Triakis semifasciata*). This argument is technologically and biologically incorrect.

Leopard sharks average 4 to 5 feet in length, possess small mouths, and feed primarily on benthic invertebrates (crabs, clams) and small fish. They do not possess the broad, bone-hinged jaw structures or razor-sharp, serrated teeth that require heavy wire leaders or hooks exceeding 1.5 inches. Anglers sustainably targeting legitimate shore species can, and routinely do, safely catch them using smaller circle hooks (such as sizes 1/0 to 5/0) and heavy monofilament or fluorocarbon leaders.

I am well-versed in this fishing technology as we utilize a variety of hooks and gear in our research work.

The only functional reason a shore-based angler utilizes an industrial wire leader and a massive hook exceeding 1.5 inches is to handle the immense weight, shearing power, and abrasive skin of massive apex predators, most notably juvenile and adult White Sharks (*Carcharodon carcharias*), which are fully protected under California law (AB 2109). The restriction does not punish everyday surf fishers; it deliberately removes the specialized toolkit required to pull apex predators into the surf line.

Mako sharks are apex, open-ocean predators that do not inhabit shallow beach surf zones; they are targeted almost exclusively from offshore vessels, which are unaffected by this shore-based regulation. Thresher sharks, whose populations are only recently recovering after decades of devastating historical pressure from commercial drift gillnets, are open-water schooling fish feeders. They are not a resident shoreline species. Invoking these species to defend land-based, heavy-tackle shark fishing is a logical fallacy designed to obscure the fact that the only large sharks consistently accessible from the sand are protected juvenile White Sharks and vulnerable nearshore Sevengills.

2. The Physiological and Lethal Toll of Land-Based "Catch and Release."

Opponents frame catch-and-release fishing as a harmless, conservation-neutral hobby. Peer-reviewed marine science proves otherwise. Landing a heavy shark from the shore is vastly more detrimental to the animal than boat-based angling due to unique physiological stressors:

Severe Metabolic Acidosis: Sharks are obligate ram ventilators or rely heavily on constant movement to flush water through their gills. The prolonged, exhaustive struggle against heavy drag from the shoreline causes a rapid, catastrophic accumulation of blood lactate and a sharp drop in blood pH. A landmark study on shore-based shark fishing stress (Binstock et al., 2023) documented post-release mortality (PRM) rates as high as 45% to 50% for sensitive species due to metabolic failure and irreversible muscle damage (rhabdomyolysis) occurring hours after the shark is released.

Internal Organ Crushing (Gravity Damage): Unlike bony fish, sharks have a cartilaginous skeleton and lack a rigid rib cage. Their internal organs are supported entirely by the natural buoyancy of deep water. When a large shark is dragged onto the hard sand or rocks of a beach, its immense body weight collapses inward, crushing its liver, heart, and internal vasculature. This causes severe internal hemorrhaging that is completely invisible to the angler taking a photograph, but lethal to the shark post-release.

I am VERY well versed in how taxing such fishing methodology is on shark species, as we often utilize boat fishing practices for the purpose of scientific tagging. When spear tagging is not an option, we land sharks from boats to install satellite and acoustic transmitters. It's a very meticulous process that requires extensive care to ensure the sharks do not suffer post-release mortality. While some species and individuals are more resilient, others are not. It is my job to be in the water when sharks are landed, and I often have to swim the sharks off by pushing them by the tail to revive them, or they could potentially sink to the bottom and die. I find that I have to intervene in at least 30-40 percent of situations, on average. These are the risks and precautions we take for the highly beneficial purpose of gathering scientific data to study and protect shark species. Subjecting these animals to this kind of physiological trauma purely for an Instagram photo or personal entertainment is an unjustifiable ecological risk and arguably a moral conflict.

3. Public Safety, Attraction, and the Coexistence Boundary:

A primary driver of land-based shark fishing is social media validation, where anglers capture "trophy" photos with distressed animals on the sand before releasing them. To achieve this, anglers frequently deploy heavy chum lines and large baits directly from public beaches, piers, and jetties.

Chumming and baiting near shore actively draw large, predatory sharks into shallow water zones heavily used by swimmers, surfers, and wading families. This creates an artificial overlap between apex predators and human recreation, severely compromising public safety and risking negative human-shark interactions that ultimately result in public backlash against shark conservation. Managing the

"coexistence boundary" requires keeping heavy attractants and heavy shark-fighting gear away from public recreation beaches.

4. Historical Context: The 1910 Constitutional Amendment Was for Sustenance, Not Trophy Hunting:

Opponents frequently cite Article I, Section 25 of the California Constitution, claiming it protects their absolute "right to fish" from public lands. This argument ignores the historical context and legal intent of the 1910 amendment.

Voters passed Section 25 in the early 20th century as a direct reaction to wealthy private developers monopolizing coastlines and cutting off public water access. The amendment was written to guarantee subsistence fishing rights, ensuring that working-class citizens, immigrants, and their families had uninterrupted access to public waters to harvest sustainable marine protein for survival.

It was never intended to provide constitutional protection for an industrialized recreational sport, nor did it envision wrestling protected apex predators onto the sand for pure entertainment or digital media exposure. Furthermore, Section 25 explicitly includes the caveat that the Legislature may provide the "conditions under which the different species of fish may be taken." Restricting destructive gear types falls entirely within this constitutional authority.

5. Suggestion for Future Consideration for Restricting Use of Bait-Dropping Drones:

The emergency regulation initially considered restrictions on drone-assisted baiting, which were unfortunately removed. This omission undermines the efficacy of the gear restriction.

Recreational fishers do not utilize high-powered, GPS-guided drones to drop small baits into the surf zone for 15-pound leopard sharks. Drones are deployed explicitly to carry massive, bloody baits (such as whole rays or fish heads) hundreds of yards past the breaker line into the migratory corridors of large pelagic sharks and protected White Sharks. Allowing drone-assisted baiting to continue facilitates the intentional targeting of apex predators from public beaches. I strongly urge the Department to reinstate the ban on drone baiting in the permanent rulemaking phase.

In conclusion, the emergency regulations enacted by the Commission are common-sense, scientifically backed measures that close dangerous regulatory loopholes. Forcing an end to the use of heavy wire leaders and oversized hooks from the shoreline protects vulnerable, ecologically vital apex predators from lethal capture stress, aligns with the true historical intent of California's fishing laws, and protects public safety on our shared beaches.

I strongly support these emergency restrictions and urge the Department to make them permanent, while also reconsidering a future full ban on chumming and drone-assisted baiting from public shorelines.

Thank you sincerely for your dedication to protecting California's marine ecosystems. If I can be of any future assistance in any way, please do not hesitate to reach out.

Cheers,

--

Kinga Philipps | Executive Producer and Host of Shark Week
Emmy & Telly Winning Journalist | Producer | Writer

Travel & Conservation News Correspondent
National Geographic, Travel Channel, History Channel, Discovery, BBC
[The Explorers Club FN'18](#) | www.sharkallies.com
www.kingaphilipps.com

June 23, 2026

Dear California Fish & Game Commission and Office of Administrative Law,

As researchers of wildlife crime and shark conservation policy, we fully support and commend the Commission's proposal to amend § 28.06 and § 28.65 to prohibit removal of white sharks from the water, and to prohibit wire leader and hooks exceeding 1.5" internal gap south of Pigeon Point. We would also like to offer suggestions to close loopholes based on our observations studying shark fishing policy across U.S. states.

We represent a research collaboration of coders, criminologists, conservation biologists and legal scholars conducting the largest study of land-based shark fishing to date. Our opinions are our own and do not represent the opinions of our associated institutions. Our preliminary social media analysis indicates that California is an outlier in rates of full removal of sharks from the water, at 90.7%. Contributing factors include the concentration of shark fishing activity on piers and the state's fishing regulations.

In Florida, where removal of prohibited shark species is illegal, rates of full removal of these species in social media posts is significantly lower (49.8%). However, we caution the Commission that these regulations must be explicit and without loopholes to be effective.

We recommend California extend the proposed handling regulations to explicitly prohibit:

- delay of release for any reason, including photographs, as in New York and Florida ([NYCRR 6 § 40.6](#), [FAC § 68B 44.004\(3\)\(d\)](#))
- use of treble or gaff hooks on prohibited species
- augmented casting by unmanned aerial systems (drones) – a violation of [Title 50 CFR § 19.11\(b\)\(2\)](#), according to the [USFWS Office of Law Enforcement](#).

We recommend these prohibitions throughout the whole state coastline, as well as urge the Commission to expand prohibited species to include the endangered mako shark (*Isurus oxyrinchus*), to eliminate plausible deniability and potential confusion between the similar species. In Florida, FWC prohibits take of six shark species in state waters that are permitted by NOAA in federal waters. These state water protections have minimal spatial overlap with fishing vessels and are critical to conserving coastal nurseries of these species. California prohibits only one shark species: the white (*Carcharodon carcharias*).

Relatedly, we recommend prohibition of take for the critically endangered tope shark (*Galeorhinus galeus*) in state waters, at least in the vicinity of known breeding aggregation sites. While the tope was not granted ESA-listing status in the most recent NOAA Assessment, global abundance trends show declines of [88% in three generations](#) and the Northeast Pacific population is data-deficient.

As you may be aware, in April, sensationalized media coverage of a "[white shark rescue](#)" at Hermosa Beach in LA County, which was in reality shark fishing, spread rapidly online. In subsequent days, fishermen flocked to the Hermosa Pier, reportedly hooking [over 20 white sharks in a day](#). This incident strongly indicates illegal pursuit of white sharks, endangering swimmers and likely [killing several sharks](#). We strongly encourage the Commission to implement the proposed regulations and consider adding the previously mentioned prohibitions to deter illegal shark fishing.

Thank you for your dedication to California wildlife,

Spencer Roberts
PhD Candidate
Abess Center for Ecosystem Science & Policy
Rosenstiel School of Marine, Atmospheric, & Earth Sciences
University of Miami

Jennifer Jacquet
Professor
Abess Center for Ecosystem Science & Policy
Rosenstiel School of Marine, Atmospheric, & Earth Sciences
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Gohar A. Petrossian
Professor, John Jay College of Criminal Justice
Executive Officer of the Doctoral Program in Criminal Justice, The Graduate Center
City University of New York

Juliana Freire, ACM Fellow, AAAS Fellow
Institute Professor, Tandon School of Engineering
Professor, Computer Science and Data Science
Director, Visualization, Imaging and Data Analysis (VIDA) Center
New York University

Natalie Jacewicz
Assistant Professor
University of San Diego School of Law

Sunandan Chakraborty
Associate Professor
Luddy School of Informatics, Computing, and Engineering
Indiana University Indianapolis

Kinshuk Sharma
PhD Candidate
Luddy School of Informatics, Computing, and Engineering
Indiana University Indianapolis

Candace Drabeck
Marine Conservation Master's Student
Rosenstiel School of Marine, Atmospheric, & Earth Sciences
University of Miami

Ulhas Gondhali
PhD student
John Jay College of Criminal justice,
City University of New York

From: Grace Van de Pas
Sent: Tuesday, June 23, 2026 1:04 PM
To: FGC; OAL Reference Attorney@OAL
Subject: Emergency Regulations: Recreational Gear Restrictions for White Shark

Categories: Exhibit

Dear California Fish and Game Commission,

I am reaching out in support of new measures to ban the use of shark fishing equipment south of Pigeon Point to better protect great white sharks. Due to increased targeting of the species, this measure would close long-standing loopholes and have a significant impact on their protection.

I imagine you have received many opposing comments from fishermen, and to give context, many will be based where I live, in Florida. The culture of Land Based Shark Fishing (LBSF) within our state has rapidly grown out of control with poor enforcement of regulations from our state wildlife agency. Opposition to the well-justified regulations proposed by the Commission is not based in the interest of conservation, or even favored by most recreational anglers. Metal leaders and massive circle hooks are used to exploit loopholes that have allowed for the poaching of species California protects, loopholes we would aim to close for any other vulnerable species. Do not let this poaching culture fester in California as it has in Florida, as it is difficult to close the gates on illegal and cruel mishandling of sharks once they have been opened.

Comments opposing the Commission's proposed regulations are being driven by an individual, previously in California and now in Florida, who has participated in the [poaching of a white shark](#) on video. Spencer Wonder, representing the corporations Terra Firma Tackle and Land-Based Angling Alliance, was investigated for criminal mishandling, including gaffing a young female white shark, causing torn gills. While the District Attorney did not bring charges, there is ample evidence this man knowingly participated in this crime. While other fishermen involved claimed they misidentified the shark as a mako, this individual stated that he knew it was a white and "was totally against gaffing it", yet [did not intervene to stop the gaffing](#) or report the crime in progress to CDFW law enforcement.

We also urge the commission to consider the most common excuse given for the mishandling and poaching of white sharks: the misidentification of white sharks as makos. Unless the mako shark is protected, white shark poaching will continue to have a bulletproof excuse. Whether fishermen are using this excuse conveniently or genuinely do not know what species they are catching, the justification for protecting the mako is equally strong. The state of California has the ability to protect more species than are protected in federal waters. Many coastal states have also enacted protections for other species, and California can and should put further restrictions on the fishing and killing of the many IUCN Redlisted species that inhabit and migrate through its waters.

I commend the commission for the steps it is taking to protect this beautiful and threatened species, it is encouraging seeing positive changes being made in favor of the sharks we share our seas with.

Thank you,
Grace Van de Pas



GREATER FARALLONES ASSOCIATION

June 24, 2026

California Fish and Game Commission
Attn: Melissa Miller-Henson, Executive Director
P.O. Box 944209
Sacramento, CA 94244-2090

Sent via email to fgc@fgc.ca.gov

RE: Support for Amendments to Title 14 CCR Sections 28.06 and 28.65 Regarding Recreational Gear Restrictions for White Shark (SCH No. 2026060900)

Dear Commissioners:

On behalf of the Greater Farallones Association, I am writing in strong support of the California Fish and Game Commission's amendments to Title 14, California Code of Regulations, Sections 28.06 and 28.65 regarding recreational gear restrictions and handling requirements for white sharks.

Greater Farallones Association works to conserve the wildlife and habitats of California's nationally significant Greater Farallones (GFNMS), Cordell Bank, and Monterey Bay (from Marin to Santa Cruz County) national marine sanctuaries through science, education, and restoration. We recognize that effective ocean stewardship requires adaptive management informed by emerging conditions and conservation needs. GFA supports the GFNMS-managed [White Shark Stewardship Program](#), and the CDFW proposed action is consistent with this program and the sanctuary regulations related to attracting and approaching white sharks.

White sharks play a critical role as apex predators in California's marine ecosystems. Their presence helps maintain ecological balance and supports the health and resilience of coastal food webs. As protected species, white sharks warrant careful stewardship and management measures that minimize avoidable mortality and disturbance.

The need for these protections is particularly important given reports of recent white shark deaths associated with recreational fishing activities and increasing observations of juvenile white sharks along California's coast. As ocean conditions continue to shift and white shark distribution changes, proactive management measures are necessary to reduce harmful interactions between people and wildlife and to ensure that protected species remain protected in practice as well as in regulation.

The proposed amendments also provide important public safety benefits. By discouraging the use of gear commonly associated with targeting large sharks in heavily used coastal recreation areas, the regulations help reduce the risk of dangerous interactions involving hooked sharks, anglers, swimmers, surfers, and other ocean users.

Therefore we support the Commission's proposed requirements to immediately release hooked white sharks, prohibit removing white sharks from the water, and restrict the use of fishing gear that can facilitate the intentional targeting of white sharks from shore-based locations. These measures

represent a practical, science-based approach to reducing shark mortality while promoting responsible recreational fishing practices. The Commission's proposed amendments demonstrate a commitment to protecting both marine ecosystems and the public.

Thank you for your leadership in advancing these important protections for California's marine wildlife. We respectfully urge the Commission to adopt and implement these amendments.

Sincerely,

Maria Brown

Maria Brown
Board Vice President
Greater Farallones Association

From: Sofya Sadiq [REDACTED]
Sent: Wednesday, June 24, 2026 1:16 PM
To: FGC
Subject: Protect White Sharks

Categories: Exhibit

To whom it may concern,

I am a local citizen and wish to express my support of the emergency regulation to protect great white sharks and large sharks from beach fishing.

I have seen a man on the beach fishing great white sharks. He lied and told lifeguards it was not a great white shark, but a Mako. The lifeguards were afraid of him and let it go. In fact, it was a great white shark and I took pictures.

Great white sharks are a cornerstone species of our local ocean ecosystem. They need to be protected, which I believe is what the law intended. Please do whatever you can to protect great white sharks in our SoCal oceans.

Thanks very much for your time!

Sofya Sadiq

“Treat people as if they were what they ought to be, & you help them become what they are capable of being.”

--Johann Wolfgang von Goethe

From: Jen Conley [REDACTED]
Sent: Tuesday, June 30, 2026 8:08 PM
To: FGC; OAL Reference Attorney@OAL
Subject: ATTENTION: Emergency Regulations: Recreational Gear Restrictions for White Shark

Categories: Exhibit

To the California Fish & Game Commission,

I strongly support the proposed regulations to prohibit wire leaders and large hooks used to target white sharks, as well as requiring this species to be kept fully submerged if incidentally caught. For too long, our beloved great whites have been illegally targeted using this gear, under the auspices of targeting other species.

To ensure these regulations are truly effective, I urge the Commission to include the following critical protections:

Protect Mako Sharks: Standardize these gear restrictions to include mako sharks as well, effectively eliminating the common excuse of "mistaken species" by fishermen.

Prohibit Drone Fishing: Ban the use of drones for shark fishing to align state regulations with federal law.

Ban White Shark Photoshoots: Explicitly prohibit prolonged photoshoots with captured white sharks, which unnecessarily delays their release and decreases their survival rate.

Mandate Gill Submergence: Strictly require that the shark's gills remain completely submerged at all times during an incidental capture to ensure proper respiration.

As warm El Niño waters stir, bringing more sharks to California shores, these regulations are more than warranted to protect California swimmers, surfers, and sharks alike.

Thank you for your time and dedication to protecting our marine ecosystems.

Kindly,

Jennifer Conley

From: Dominique Cano-Stocco
Sent: Tuesday, June 30, 2026 8:49 AM
To: FGC
Subject: Rec. Fishing Gear - White Sharks

Categories: Exhibit

I applaud the commission for taking necessary action to protect the public and marine animals, specifically Great White Sharks, from harmful and reckless fishing practices and gear. And, I urge the commission to make the emergency declaration permanent, with additional & rational bans on the use of chum in any form of delivery (off a pier, via drone, etc)

The science is clear on this matter, while rampant misinformation on social media is not.

The harm to marine life goes beyond just Great White Sharks. Specifically, dumping chum anywhere, to attract predators leads to unnecessarily competitive behaviors, and increases the likelihood of localized, harmful algae blooms.

Restricting the use of chum is not a new concept in need of study or further review. It's based on science and documented experiments. Importantly, it does not harm the rights of any individual to "go fishing."

Critically, targeting Great White Sharks is illegal, period. Allowing any loopholes in gear, location or attractants (chum) just undermines California's well-thought-out laws.

Finally, **the public deserves the right to enjoy the ocean, including piers, without an increased risk of fear or injury due to the reckless, inconsiderate and dangerous behaviors of bad actors who are rarely held accountable for their actions.** For example, by attracting sharks, these fishermen are endangering the lives of people in the water near the pier and for miles around. If someone is harmed, the individual(s) responsible are rarely identified, prosecuted or held financially responsible for their actions. It's the businesses impacted by closed beaches who pay. And, it's the people harmed who pay the medical bills, live with the trauma, or who lose their lives.

It's abundantly clear that the commission's decision to protect people & sharks was the right decision, and in fact, the commission should go further, by banning the practice of "chumming", anywhere.

Thank you.

Dominique Cano-Stocco
Resident of Encinitas, CA

From: Christopher Jones
Sent: Tuesday, June 30, 2026 8:12 PM
To: FGC; OAL Reference Attorney@OAL
Subject: Emergency Regulations: Recreational Gear Restrictions for White Shark

Categories: Exhibit

California Fish & Game Commission,

Studies have consistently proven that white sharks do not prefer, nor will consume humans. Those saying these things are not researched on this topic. YouTube has tens of thousands that believe myths.

Great white sharks have almost no interest in eating humans, a recent study confirms. Great white sharks are near to people in Southern California nearly every day but rarely bite them. A study published in the journal PLOS ONE illustrates this. June 2023.

Most shark-biting incidents involve a single bite – which rarely prove fatal – rather than a sustained attack. Only 14% of all shark bites are fatal. You are 3,820 times more likely to drown than die from a shark bite. The chances of drowning are 1 in 1,134 compared to the 1 in 4,332,817 odds of being bitten by a shark, much less killed.

Sharks pay the heavier price. The Journal of Marine Policy states that humans kill an estimated 100 million sharks every year. That's an average of almost 274,000 sharks every day, over 11,000 sharks every hour. More than one third of shark species are currently threatened with extinction. Populations of sharks in the open ocean have declined by 71% over the past 50 years. Yet, fewer than 10 people worldwide are killed each year by shark attacks. For context, every year approximately 24 people die after being hit by flying champagne corks; toasters kill an estimated 700 people, and lightning strikes and kills around 2,000 people. People have the risk factors totally in reverse.

I strongly support the proposed regulations to prohibit wire leaders and large hooks used to target white sharks, as well as requiring this species to be kept fully submerged if incidentally caught.

For too long, our beloved great whites have been illegally targeted using this gear, caught and dragged from the ocean for photoshoots, under the auspices of targeting other species.

As warm El Niño waters stir, bringing more sharks to California shores, these regulations are more than warranted to protect California swimmers, surfers, and sharks alike.

Thank you

From: Nick DeNezzo [REDACTED]
Sent: Tuesday, June 30, 2026 8:51 PM
To: FGC; OAL Reference Attorney@OAL
Subject: Emergency Regulations: Recreational Gear Restrictions for White Shark

Categories: Exhibit

California Fish & Game Commission,

I am a lifelong California resident and ocean user—as a swimmer, surfer, diver, and spearfisher. And as a former Scripps Institution of Oceanography graduate student, my capstone research focused on human-shark interactions, particularly with regard to great white sharks here along the California coast.

I strongly support the proposed regulations to prohibit wire leaders and large hooks used to target white sharks, as well as requiring this species to be kept fully submerged if incidentally caught.

I have seen far too many instances, both in person and posted online, in which fisherman have skirted the legal loopholes to illegally target great whites. There are numerous examples throughout social media showing white sharks hauled from the water to pose for photos, all while claiming the catch was accidental. And even worse, there are fishing companies deriving profit specifically from these illegal catches, using the photos in their promotional material and teaching others how to manipulate the same loopholes in the system.

Those who intentionally target these sharks put both the wildlife and beachgoers at higher risk. Post-release mortality rates increase due to factors like longer fight time or time spent out of the water—factors that are prevalent when these sharks are specifically targeted and brought to shore. The presence of bait and chum also risks bringing hungry sharks closer to shore, potentially increasing contact with unaware beachgoers.

As we face a future that's likely to bring warmer waters—and more sharks—to the California coast, these regulations are essential to protecting both beach users and white sharks.

Thank you,

Nicholas DeNezzo, M.A.S. | Marine Conservation Artist
Nicholas DeNezzo Fine Art

www.nicholasdenezzo.com

California Fish and Game Commission
Sample Comments Opposing White Shark Emergency Regulations

June 2026

1. [Emails from Nick Heid, Surf Fishing in So Cal](#), received June 19 and 20, 2026
2. [Email from Jeremy Rodda](#), received June 19, 2026
3. [Email from Maxx Martinez, Captain](#), received June 19, 2026
4. [Email Beau Johnson](#), received June 21, 2026
5. [Email from Ryan Lee, Laboratory Analyst, Onterris, and Research, Department of Biological Sciences, CSU Fullerton](#), received June 21, 2026
6. [Letter from Luke Totah](#), received June 22, 2026
7. [Email from Philip Wright](#), received June 22, 2026
8. [Email from Thomas Campion](#), received June 21, 2026
9. [Email from Cameron Cochran](#), received June 19, 2026
10. [Email from Felix Miller](#), received June 30, 2026
11. [Email from Being Kyant](#), received June 30, 2026

From: Nick Heid

Sent: Friday, June 19, 2026 01:52 PM

To: OAL Reference Attorney@OAL <OALReferenceAttorney@oal.ca.gov>; FGC <FGC@fgc.ca.gov>

Subject: Emergency Regulations: Recreational Gear Restrictions for White Shark

To the Office of Administrative Law and the California Fish and Game Commission,

Re: Emergency Regulations: Recreational Gear Restrictions for White Shark

I am writing as a California resident and frequent surf angler to formally oppose this emergency regulation and request that it be blocked before taking effect.

I fish the Southern California surf several times per week, primarily targeting leopard sharks and soupfin sharks. In a typical year I land between 25 and 100 leopard sharks in the 5-foot range, along with a number of 6-foot soupfin sharks. I have never landed a white shark. The one time I hooked one by accident, the fish went airborne and broke off within 15 seconds because my gear was not built to handle a fish of that size or strength. It is simply not the gear anglers use when targeting white sharks.

My hooks are 7/0 to 9/0 circle hooks, well under the 1.5-inch maximum inside measurement this regulation restricts. This is gear scaled for leopard and soupfin sharks, not white sharks, and it illustrates a broader point. Anglers fishing for smaller coastal shark species are not the source of the white shark interactions this regulation is meant to address.

Wire leader is not optional equipment for this fishery. Leopard sharks and soupfin sharks have abrasive skin and a fighting style that shreds monofilament or fluorocarbon leader on a regular basis. Without wire, a meaningful share of fights against these species end in a break-off rather than a landed fish. **The practical result of banning wire leader is not fewer sharks hooked. It is far more sharks swimming away with a hook and a long trailing length of monofilament still attached. That outcome is worse for the animals, not better.** It is also a source of marine debris that does not exist when a fish is landed, unhooked, and released with wire leader.

I recognize the Commission's stated concern is public safety and reducing white shark interactions during a season of elevated white shark presence in Southern California waters. I share that concern and support efforts that are actually targeted at the gear and practices associated with intentionally or incidentally hooking white sharks specifically, such as heavier leader than 150LB, larger hooks than 3-4", chum, and bait presentations scaled for large sharks. But a blanket wire leader ban that applies

coastwide, to every angler targeting every species of shark and not just white sharks, sweeps in a long established, sustainable, catch and release coastal shark fishery that has no meaningful overlap with the white shark issue this regulation is trying to solve.

I fish for these animals because I love them and because they're central to my business in content creation and guiding. Leopard sharks in particular are one of the more remarkable things people can experience firsthand on a California beach, and getting to see one up close, healthy, and released safely is something I do not take lightly. A regulation that results in more shark injuries and mortality, not fewer, while doing little to address actual white shark interactions, does not serve the conservation goals the Commission is trying to achieve.

I respectfully request that this emergency regulation be blocked, or at minimum narrowed so that wire leader restrictions apply only when using a massive hook, and in the specific circumstances actually associated with white shark interactions, rather than coastwide across all recreational shark fishing.

Thank you for your consideration.

--

Nick Heid

Surf Fishing In So Cal

surffishingsocalsd.com

-----Original Message-----

From: Nicholas Heid

Sent: Saturday, June 20, 2026 10:09 AM

To: FGC <FGC@fgc.ca.gov>; OAL Reference Attorney@OAL
<OALReferenceAttorney@oal.ca.gov>

Subject: Emergency Regulations — Recreational Gear Restrictions for White Shark

To the Office of Administrative Law and the California Fish and Game Commission

Re: Emergency Regulations: Recreational Gear Restrictions for White Shark

I submitted a comment on this regulation earlier this week explaining my own fishing practices and why wire leader is essential equipment for the leopard shark and soupfin shark fishery I participate in regularly. I am writing again because the more I have sat with this regulation, the more convinced I am that the cost benefit analysis behind it does not hold up, and I want to lay that out plainly.

The stated basis for this emergency action is that Shark Stewards documented more than 30 instances of anglers illegally targeting white sharks in Southern California. I do not dispute that number, and I do not defend anyone illegally targeting a protected species. But I want the Commission to actually weigh that number against what this regulation will cost on the other side of the ledger, because I do not believe that weighing has happened.

I am one angler. In a typical year I hook somewhere between 50 and 100 leopard sharks from the surf, none of them white sharks, all of them legally targeted with appropriately sized circle hooks and wire leader. I am not unusual. I am one of many thousands of anglers fishing this coast for leopard sharks, soupfin sharks, sevengills, threshers, and makos every season. Take away wire leader, and a meaningful share of those fish are no longer landed cleanly and released. They are lost mid fight, swimming away with a hook and a length of monofilament still attached. That is a worse outcome for the animal, not a better one, and it is happening at a scale that dwarfs the 30 incidents this regulation is meant to address.

The hook size restriction compounds this. Anglers targeting sevengill, thresher, and mako sharks rely on larger circle hooks sized appropriately for those species, gear that is specifically designed to hook in the corner of the mouth rather than be swallowed. Forcing smaller hooks than what is appropriate increases the likelihood of deep hooking and gut hooking, the exact outcome circle hooks are used to prevent. A rule framed as protecting sharks is, in this specific provision, making injury more likely for the sharks anglers are legally targeting and even the anglers themselves.

I recognize the Commission is acting out of genuine concern for public safety and for white sharks specifically, and I do not question that the underlying concern is real. But a coastwide gear ban that sweeps in every species of shark and every angler targeting them, in order to address a problem caused by a small number of people acting illegally, is not a proportionate

response. It trades a documented, limited harm for a much larger, undocumented one, and asks an entire sustainable fishery to absorb the cost of a problem it did not create.

I would ask the Commission to look closely at that trade before this becomes permanent, and to consider whether a narrower rule, one that targets the gear and practices actually associated with white shark targeting specifically, rather than every species of shark coastwide, would achieve the same public safety goal without the unintended harm this version creates.

Thank you for your time and consideration.

From: Jeremy Rodda

Sent: Friday, June 19, 2026 10:04 PM

To: FGC <FGC@fgc.ca.gov>; OAL Reference Attorney@OAL <OALReferenceAttorney@oal.ca.gov>

Subject: Recreational Gear Restriction for White Sharks

To the Fish and Game Commission,

I have read through the emergency proposal for protecting nearshore white sharks this year.

As one of the more progressive nearshore shark fishermen in the state, I understand the concern. There are too many shore fishermen using oversized gear and getting away with targeting white sharks under false or improbable pretenses. This has been an ongoing issue for at least the last ten years, and we have Mark Zuckerberg among several others to thank for the rise in popularity of covertly fishing for white sharks nearshore.

The fine line I wish to be drawn in this situation is for legitimate law abiding nearshore shark fishermen targeting sevengills and soupfin. These are, in some areas, much more common than white sharks, and legal to take/target. I have spent several years targeting these species and there is a small but passionate and responsible community of anglers who appreciate these fisheries.

Tackle-wise, these are successfully targeted with the use of 3' 135lb 7 strand wire leaders and 10/0 octopus circle hooks. Thresher shark fishing also sometimes benefits from 135lb 7 strand wire.

If a compromise for the current emergency proposal could be made, I would request that instead of banning all wire leaders, there could be a wire leader length limit and possible diameter limit, set at 3' length and .8mm diameter (135lb 7 strand is .69mm diameter). The inner hook diameter limit is reasonable for the purposes of the sevengill, soupfin, and thresher fisheries.

On a similar note, regulation enforcement would go a long way toward curbing incidents. While I am not a regular at piers, I have been checked twice for my fishing license in the last 6 years (at least 250 trips from shore and boat). It would be ideal if wardens checked piers **daily**. I live in Orange County, so from my vantage point I consider it reasonable for one team to visit the piers of Balboa, Newport, Huntington, Seal Beach, and Belmont, twice daily, starting from one of the far ends and making a loop. Clearly posted regulations with redundant signage (in English, Spanish, Vietnamese, and Mandarin) along with regular enforcement would likely go a long way in helping both education and enforcement.

I am sure you will hear other impassioned insights on this matter. As someone who cares deeply about both conservation and the continued access to California fisheries, It would be of great relief to not lose reasonable access to the sevengill and soupfin fisheries. I respect your intent to manage this predicament, and I hope you take my specific requests into consideration.

If for any reason you would like to contact me, I am deeply interested in this conversation and have no problem making more time for it. You can reply to this email or reach me during business hours at the number below.

Sincerely,

Jeremy Rodda,

From: Maxx Martinez

Sent: Friday, June 19, 2026 01:56 PM

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

Subject: Emergency action

To whom it may concern, Regarding "Emergency action to amend Sections 28.06 and 28.65 Title 14, California Code of regulations for White shark."

I'm Captain Max Martinez avid fisherman and conservationist.

Working on the sea for 11 months of the year. 10 of those months I sample and collect data for The Sportfishing Association of California (SAC) also for the National Oceanic and Atmospheric Administration (NOAA). The ban on metallic leaders and hooks size is preposterous. That needs to be re-thought and re-write. The ban would endanger and hinder nearly all sharks not just the white sharks. There are 10+ other species of shark that are legal to fish for that you wouldn't be able to effectively or safely fish for. Working with us in maybe minimizing metallic leaders to 1.4mm -1.2mm would be a lot more efficient. We have several strict laws already in play to protect white sharks. If we enforce those those better there would be no problem. If we could make a program with an endorsement on the license if you want to participate in land base shark fishing. With this emergency action you will get us allow fishermen to leave hook unwillingly in fished mouths due to bite offs which will endanger more life's. The emergency action among us will simply fail the sharks have been here they will still find the baits like they have been made to do. They aren't leaving anytime soon and neither are we; it's time we work together.

Best regards,

Captain Max Martinez

Phone #:

From: Beau Johnson

Sent: Sunday, June 21, 2026 4:37 PM

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

Subject: PUBLIC COMMENT: Emergency Regulatory Action - Recreational Gear Restrictions for White Shark (Title 14, CCR, Sec 28.06 & 28.65).

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Hello,

Please see the attached public complaint document regarding the recent proposed regulations regarding shark fishing in Southern California. These regulations affect much more than just Great White sharks.

I support White shark protections, however, prohibiting the use of cable along the coast destroys the entire shark fishery on our coast.

Thank you for your attention to this matter.

Subject: Opposition to Proposed Emergency Restrictions on Shore-Based Shark Fishing

PUBLIC COMMENT: Emergency Regulatory Action - Recreational Gear Restrictions for White Shark (Title 14, CCR, Sec 28.06 & 28.65).

Dear Members of the California Fish and Game Commission,

My name is Beau Johnson and I am a recreational shark fisherman here in Southern California. Shark fishing has become my favorite hobby within the last seven years due to many different reasons involving friends, family, life, and personal enjoyment. It has exposed me to many people and taught me many different things about people, sharks, and other animals.

I was deeply disturbed when I read the *Emergency Action to Amend Sections 28.06 and 28.65 Title 14, California Code of Regulations Re: Recreational Gear Restrictions for White Shark* document. The new proposed emergency regulations do not solve the “issue” at hand. They effectively kill off the sport for any other shark species we can catch from shore. Not to mention they will put other shark species (such as the Thresher shark) at risk. The emergency document also contains information that is misleading.

I. Protected Species and Crime

The Great White Shark (*Carcharodon carcharias*) was protected in the State of California back in 1994 because of a severe population decline. Since that time, their numbers have increased substantially, **as proven by the very existence of this emergency statement**. This should point out that the current regulations we do have on these animals is certainly enough for

the population to continue rebounding from. Especially when the current prohibitions we have actually begin being enforced.

II. El Nino

El Nino is part of what makes the Southern California fishing world renowned. An influx of pelagic fishes swim up from waters often warmer than ours because of a breakdown in trade winds that weakens coastal upwelling and drives warm equatorial currents northward. The emergency statement reads:

“This year, a forecasted strong El Niño oceanic event is anticipated to increase the presence of white sharks in California coastal waters, which will increase their availability to anglers and the potential for human interactions with hooked sharks. Young white sharks are already being observed in significantly higher numbers in southern California” (para. 2).

If the Commission proceeds through emergency rulemaking, it should clearly explain why the legal standard for emergency action is satisfied, including why ordinary rulemaking would be inadequate and why less restrictive alternatives would not sufficiently address the identified concerns.

This is the type of situation where transparency must be prioritized. I believe the issue that is trying to be addressed is one where Fish and Game Conservation (FGC) is trying to mitigate the interaction of Great White Sharks with fisherman and swimmers. While I commend you for this, it is not a realistic expectation given the ecosystem they are in. We are talking about a wild animal habitat where people frequently travel thousands of miles to enter.

III. Proposed Restrictions for 2026

The list of proposed restrictions for 2026 within the emergency statement includes horrendously overbearing regulations on anglers that would do nothing for the issues trying to be solved.

Section 28.06

- Any white Sharks caught are to be released immediately
- Prohibit removing White Sharks from the water

Section 28.65

- Prohibit the use of wire or metallic lines or leaders
 - Prohibit the use of hooks greater than 1 ½ inches (inside measurement), when fishing south of Pigeon Point (San Mateo County, 37° 11' N. lat.)
 - This restriction would apply to anglers fishing from the shoreline (including beaches, banks, piers, jetties, breakwaters, docks, and other man-made structures connected to the shore) or within 1,000 yards of the mean high tide line.
-

As far as section **28.06** goes, I don't see there being any major changes to what has already been passed. However, section **28.65** introduces numerous new regulations that do nothing for the protection of these fish, and only punish land based anglers.

Southern California's inshore waters are home to many different species of sharks. Our waters create a unique ecosystem for pelagic fish to come close to shore, which allows for unique and exhilarating opportunities that aren't available in most parts of the world.

Many of the more common local sharks people **can** catch from land include: Swell Sharks, Leopard Sharks, Soupfin (Tope) Sharks, Six Gill Sharks, Seven Gill Sharks, Prickly Sharks, Thresher Sharks, Blue Sharks, Mako Sharks, and Great White Sharks. Each one of these represents their own unique challenges for catching and landing. Of the ten sharks listed, there are two that can be reliably caught without cable. The Leopard Shark and the Thresher Shark. Of the eight that are remaining, we are not allowed to pursue or target Great White Sharks, meaning the left over majority are only reliably caught on wire or metallic lines and leaders.

By prohibiting the use of wire or metallic lines and leaders for the recreational activity or fishing for sharks, two major problems arise. First, you are essentially **removing an entire fishery** from one of the few places in the world that hold the opportunities our niche part of the coast offers. The second— and perhaps most important— factor **highlights the major target you place onto an already pressured fish; the Thresher Shark.** These fish have been labeled **"vulnerable" and are on IUCNs "Red List of Threatened Species."** They are one of the most sought after sharks available to the coastal angler of the ten sharks listed due to their insane speed and frequent acrobatics. They are truly a legendary fish for the coastal angler to catch. By removing cable from the tackle boxes of shark fishermen along the coast, you essentially limit them to only fishing for Leopard Sharks and Thresher Sharks. Since Leopard Sharks are not comparable to what any of the other ten sharks can do when hooked, the Thresher Shark would be left to support the Land Based Shark Fishing (LBSF) community on its own. To add, Thresher Sharks are generally a more fragile fish and tend to have higher mortality rates compared to their counterparts when caught.

IV. Loose Tackle in Free Swimming Fish

The emergency statement fails to mitigate the very problems it presents. The document states:

“These changes are necessary to better protect white sharks from illegal targeting, allow incidentally hooked white sharks to more easily break free from the line, and prevent sharks from being released with trailing wires that can entangle the shark after release. The restrictions will also help protect swimmers, surfers, and other ocean users from potential harm caused by a hooked shark or attached wire leader.”

Prohibiting cable and forcing fishermen to use monofilament or fluorocarbon does not solve the issue of fish swimming around with tackle stuck in their face. It only increases the amount of fish affected if we aren’t given the opportunity to remove the hooks from the animal.

This emergency statement was summed up by stating it protects swimmers, surfers, and other ocean users from harm caused by hooked sharks or wire leaders. I cannot emphasize this enough... There has only been **one** case in **all of history** where a White shark bit a swimmer while attached to a fishing line. The foundation for these proposed regulations is centered around a singular, outlier event. Punishing a group of recreational fishermen that have done nothing to endanger the community is pure government overreach. Additionally, the one instance in which this event happened **only applies to a miniscule percentage of the population** (distance swimmers) that **willingly participate** in swimming hundreds of yards from the sand.

V. Why These Regulations Won’t Fix Anything

There is no denying the influx of Great White sharks along the coast of Southern California. There are a substantial amount of these fish swimming around, which we **should be thrilled about**. These animals were initially protected due to a severe decline in their population over thirty years ago, and are now showing significant signs of a population rebound.

With that said, this emergency statement claims, “In early April 2026, 20 juvenile white sharks were caught in a single day from the Hermosa Beach Pier” (para. 7). I will be the first to admit, this is an alarming amount of protected sharks being caught from a singular pier. That is not something we should allow to happen. However, this problem **does not** highlight a lack of regulations, **nor** does it show that fishermen target these animals. **What it does blatantly demonstrate is Fish and Wildlife Conservation’s extreme lack of enforcement in regards to the rules and regulations that have already passed.**

There are already mandates in place that are supposed to prevent things like this from happening. Perhaps the most important of those being that **fishermen are not allowed to fish for sharks if there’s been a sighting of a Great White shark**. Per the Department of Fish and Wildlife (DFW) website:

“If the angler can see a white shark, or if someone (for example a public safety official, officer, or credible witness) informs the angler that a white shark was recently spotted or is present in the area then the angler would reasonably be expected to know it is present. Our wildlife officers would be required to determine whether someone had recently observed or has knowledge of a white shark present in the area to take enforcement action”

(<https://wildlife.ca.gov/Conservation/Marine/White-Shark#643032838-is-it-legal-to-attract-white-sharks-with-bait-or-decoys>).

Following this definition, it is further stated that:

“There is no specific ‘closure’ – If an angler knows a white shark is present and they are within 1 mile of the shore, pier, or jetty, then they cannot place shark lures, shark bait or shark chum in the water.”

The “Hermosa Beach Pier Incident” that had 20 Great White Sharks caught in a single day demonstrates **an extreme lack of enforcement and engagement on Fish and Wildlife’s end**. They already have parameters for this type of thing that are simply not being enforced. **Not enforcing the laws already in place does not justify further regulation.** More restrictions will not fix the issue, nor will they be acceptable.

The moment that one Great White was caught off that pier, all shark fishing should have been halted, per the **current** rules and regulations. **Start enforcing the law on those actually endangering the public, not the people enjoying their weekends.**

VI. Circle Hook Regulations

The proposed regulations on circle hooks do not make any sense either. Circle hooks have been proven to avoid gut-hooking sharks and fish substantially, sometimes **improving overall mortality rates by around 50%** when compared to a traditional J-hook. Why?

The rounded design of a circle hook is such that it forces the hook to slide out of the throat and catch cleanly in the jaw hinge of the fish or shark when used correctly. To enable the hook to maintain its intended benefit, the distance between the hook point and the shank (hook gap) must be **wider than the thickness of the animal's jaw** tissue.

Taking what we now know about circle hooks, we must acknowledge that **a Great White Shark has an incredibly thick jaw** that is covered in dense muscle. By prohibiting the use of hooks with a gap larger than 1.5 inches, you are not allowing circle hooks the physical clearance they need to roll around the thick jaw bone of a large shark effectively. Instead of rolling into the corner of the mouth, a small hook is far more likely to slide out entirely, or worse, foul-hook elsewhere or slide down into narrower throat tissue and catch internally.

With this information in mind, requiring smaller hooks for shark fishing off the Southern California Coast **does not make sense**. It is actually **more threatening** to these large Great White Sharks than if Fish & Game Conservation (FGC) was to **promote something like requiring circle hooks when targeting sharks from land, or requiring circle hooks when targeting sharks with cable from land**. All of this information was retrieved from a case study conducted by S.J. Cooke and C.D. Suski in 2004 (<https://www3.carleton.ca/fecpl/pdfs/Circle%20Hook%20Review.pdf>).

VII. Assumptive Legislature

The emergency statement also attempts to frame the *projected* increase in Great White Sharks as a threat to the public. It states:

“Given the number of white sharks taken in recent months, the confirmed deaths of at least three white sharks, and the known potential for a hooked shark to bite a human in the water, the magnitude of documented and potential harm is great” (para. 8).

It is unjust to severely cripple a fishery because of the “potential harm” it might have on a population, when the **specific harm (swimmers being bit my hooked sharks) being mentioned has only happened one time. Ever**.

A more realistic course of action in regards to the safety of the public within the water would be regulating the distance at which someone can swim past the breaking waves without a dive/swim flag. This lowers the percentage of people within range of most shark lines from piers, as well as increases the safety of those who do swim out that far in regards to boats that operate close to the beach.

Thank you for your attention to this matter.

- Beau Johnson

Resources:

Cooke, S. J., & Suski, C. D. (2004). *Are circle hooks an effective tool for conserving marine and ... Are circle hooks an effective tool for conserving marine and freshwater recreational catch-and-release fisheries?*

<https://www3.carleton.ca/fecpl/pdfs/Circle%20Hook%20Review.pdf>

New California law increases White Shark Protection. (n.d.).

<https://sharkstewards.org/new-california-white-shark-protection/>

The IUCN red list of threatened species. IUCN Redlist. (n.d.).

<https://iucnredlist.org/search?amp=&query=thresher+shark&searchType=species>

From: Ryan Le

Sent: Sunday, June 21, 2026 5:52 PM

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

Subject: Recreational Gear Restrictions for White shark

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

Attached file regarding emergency action.

Best,

Ryan Le

California Fish and Game Commission

P.O. Box 944209, Sacramento, CA 94244-2090

fgc@fgc.ca.gov

June 18, 2026

RE: OPPOSITION TO PROPOSED EMERGENCY AMENDMENTS TO SECTIONS 28.06 AND 28.65, TITLE 14, CCR — RECREATIONAL GEAR RESTRICTIONS FOR WHITE SHARK (Item No. 6, June 17–18, 2026 FGC Meeting)

Dear Commissioners and Executive Director Miller-Henson,

I am writing in strong opposition to the proposed emergency amendments to Sections 28.06 and 28.65 of Title 14 of the California Code of Regulations, which would prohibit the use of wire or metallic lines and leaders, and restrict hooks to a maximum inside measurement of one and one-half inches, for all shore-based angling south of Pigeon Point (San Mateo County). While I share the Commission's concern for the welfare of juvenile white sharks and public safety, this emergency regulation is a blunt, overbroad instrument that will cause substantial, disproportionate harm to a wide range of entirely lawful and ecologically responsible fisheries — while offering only speculative protection to the species it purports to safeguard.

I. THE REGULATION IS OVERBROAD AND WILL DEVASTATE LAWFUL TARGET FISHERIES

The proposed restriction does not narrowly target illegal white shark fishing. It categorically eliminates **standard, legal tackle configurations** that have been the backbone of responsible shore-based and pier-based shark angling in Southern California for generations including for several species whose size, dentition, or fight characteristics make wire leader and large-gap hooks a practical necessity rather than a convenience. The following legal, non-prohibited species are directly harmed by this regulation:

- Leopard shark (*Triakis semifasciata*) — One of the most popular catch-and-release shore species in Southern California and the Bay Area. Wire leaders of 80–200 lb coated cable are the established standard for leopard shark fishing, necessary to prevent bite-offs from the species' abrasive, cartilaginous jaw

structure and dermal denticles. Hook sizes 8/0–12/0 are routinely employed for large adult females and fall far outside the proposed 1.5-inch inside-gap limit.

- Soupfin shark (*Galeorhinus galeus*) — A slow-reproducing, near-threatened species. Anglers targeting this species from shore use the same wire rigs. A Soupfin large enough to reproduce will bite through any monofilament leader, making wire leader non-negotiable for ethical catch-and-release.
- Broadnose sevengill shark (*Notorynchus cepedianus*) — A resident apex predator found in bays, harbors, and nearshore environments throughout Southern California. Shore and pier anglers targeting sevengills for catch-and-release employ large-gap circle hooks and wire leaders. This species is a subject of active population genetics research and is ecologically invaluable as an inshore apex predator.
- Bluntnose sixgill shark (*Hexanchus griseus*) — A deepwater species occasionally accessible from shore with deep-water reach. Sixgills are large, powerful sharks that require heavy wire leader and large circle hooks (10/0 and above) for safe, ethical catch-and-release. The species' size and dentition make monofilament leaders functionally useless for this fishery.
- Shortfin mako shark (*Isurus oxyrinchus*) — While makos are rarely encountered by surf casters, they are occasionally taken by pier anglers and niche land based anglers fishing deeper water accessible from extended pier structures, using 6/0–10/0 hooks and wire leader as standard tackle. The Pacific shortfin mako stock is federally assessed and managed under the Shark Conservation Act; California recreational landings are incidental and already constrained by federal retention rules. This regulation would not improve federal stock management, but would eliminate the small legal pier fishery for the species.

The regulation makes no attempt to distinguish between gear presented as *targeted white shark tackle* and gear that happens to share dimensional characteristics. This is regulatory overreach. It is the equivalent of banning all firearms over a certain caliber to prevent one type of illegal poaching.

II. THE CENTRAL INCIDENT DRIVING THIS PROPOSAL WAS ALREADY ILLEGAL — AND SHOULD BE ENFORCED, NOT USED TO JUSTIFY RESTRICTING LAWFUL ANGLERS

The event most heavily relied upon to justify this emergency rulemaking — the April 2026 Hermosa Beach Pier incident in which more than 20 juvenile white sharks were hooked in a single day — was not a case of lawful anglers incidentally encountering a protected species. By the Department's own account, this involved sustained, repeated targeting of white sharks, a species that has been fully protected from recreational take since 1994 under Section 28.06. Sharks were hooked and, in at least three documented

cases, died after being released with wire leaders and large hooks trailing from their bodies.

This was not a gray area. Intentionally fishing for white sharks is **already illegal** under existing Section 28.06. Continuing to fish for and hook more than 20 individuals of a fully protected species in a single day at a single, well-known location is not a gear problem, it is a **law enforcement and compliance failure**. No new prohibition on wire leaders or hook size changes the fact that targeting white sharks was, and remains, against the law before and after this rulemaking. The appropriate response to anglers knowingly and repeatedly violating an existing take prohibition is citation, confiscation of gear, and license suspension under the Department's existing enforcement authority, not a sweeping new gear restriction imposed on the thousands of anglers who were not engaged in this conduct.

Critically, the emergency findings do not establish that increased enforcement, citations, or warden presence at Hermosa Beach Pier was attempted and failed before this regulation was proposed. If illegal targeting of white sharks was occurring openly enough for the Department to document more than 20 specimens hooked in a single day, that is a textbook case for immediate, visible enforcement action at that specific location — not a basis for amending statewide gear regulations covering hundreds of miles of coastline and species that have nothing to do with the violation.

Restricting gear for the entire population of shore, and pier-based anglers because a known group of individuals broke an existing law, at a specific known location, is the regulatory equivalent of closing a road to all drivers because a few were caught speeding at one intersection, when ticketing the speeders was always an available and more direct remedy. The Commission should direct the Department to report on what enforcement actions, if any, were taken at Hermosa Beach Pier in response to the documented April 2026 incident before adopting any new restriction on lawful gear.

III. THE "EMERGENCY" JUSTIFICATION DOES NOT WITHSTAND SCRUTINY

The Commission's emergency finding rests on three premises: (1) at least three white shark deaths in 2026 attributable to hook-and-line gear, (2) a forecasted El Niño event expected to increase juvenile white shark presence, and (3) a 2014 incident in which a shark bit a swimmer after being hooked. Each of these deserves critical examination.

A. Three documented deaths are not a population-level emergency. California's white shark population, while not subject to commercial take, is slow-growing, late-

maturing, and long-lived, yet three incidental deaths, while regrettable, do not constitute the kind of acute, species-threatening emergency that warrants bypass of normal rulemaking procedures under Fish and Game Code Section 399. The Commission must ask: would the normal 45-day public comment process have materially reduced that number? Almost certainly not, as these deaths occurred in April 2026 — well before any regulation could have been implemented even under emergency authority.

B. NOAA's El Niño forecast is predictive, not confirmatory. The emergency findings acknowledge that the anticipated increase in white shark aggregations is based on a forecast, not observed conditions. Regulations founded on forecast modeling, rather than on documented, imminent, and irreversible harm, do not satisfy the standard for emergency rulemaking. The harm anticipated is speculative and seasonal. A properly noticed rulemaking with expedited comment could have achieved the same ends without cutting off public participation.

C. The 2014 Manhattan Beach incident is a 12-year-old data point. Citing a single incident from 2014 as evidence of a present-day emergency weakens rather than strengthens the Department's case. If that incident were truly dispositive, the Department had over a decade to pursue a properly noticed rulemaking. Its failure to do so undermines the credibility of the emergency designation.

IV. THE 1,000-YARD OFFSHORE BOUNDARY IS SCIENTIFICALLY UNWARRANTED

The proposed regulation extends gear restrictions to any angler fishing within 1,000 yards of the mean high tide line — including from vessels such as kayaks, personal watercraft, and small boats. This exceeds the reach of any realistic shore-cast. A typical pier or surf angler casts 50 to 150 yards. Even drone-deployed baits rarely exceed 400–500 yards. The 1,000-yard boundary serves no demonstrable conservation purpose but dramatically expands the regulation's intrusion into small-vessel recreational fishing in nearshore waters, a class of anglers who were not identified as causing any of the documented incidents.

The scientific basis for the Pigeon Point boundary (37° 11' N. lat.) is acknowledged in the staff summary as historical, juvenile white sharks have "not previously been observed" north of Santa Cruz. As ocean temperatures shift under climate change and El Niño events, this geographic logic becomes increasingly tenuous as a permanent regulatory line. The Commission should be cautious about encoding a static geographic restriction based on historical range data during a period of documented range expansion.

V. LESS RESTRICTIVE, TARGETED ALTERNATIVES EXIST AND WERE NOT ADEQUATELY CONSIDERED

The Commission has multiple, better-tailored tools available that would protect juvenile white sharks without broadly eliminating lawful fisheries:

- Mandatory use of non-offset, non-stainless BARBLESS steel circle hooks when targeting elasmobranchs from shore; already standard in other states and consistent with existing federal shark tournament regulations ;promotes release survival without requiring elimination of wire leaders.
- Targeted enforcement at known hotspots, including Hermosa Beach Pier, where the documented illegal targeting actually occurred; citations, gear confiscation, and license suspension under existing Section 28.06 authority directly address the conduct described in the Department's own findings, rather than restricting gear for anglers who were not involved.
- Species-targeted bait restrictions in documented white shark aggregation areas (e.g., prohibiting whole fish baits over a certain size near documented nursery zones during peak aggregation months of May through October) would directly reduce incidental white shark hookings without affecting leopard shark, sevengill, tope, or mako anglers.
- Geographic spot closures limited to the locations where incidents actually occurred, rather than a blanket restriction on all shore-based angling across the entire Southern California coastline.
- A requirement to immediately cut the line without removing the shark from water upon incidental white shark hookup, combined with clear enforcement protocols and increased warden presence at high-aggregation piers, would address the documented mortality mechanism directly.

The Department's own finding acknowledges that the gear restriction is designed to make it *easier for white sharks to break free from the line* after being hooked. This concedes that the primary intervention point is post-hookup, not pre-hookup — a goal that is better achieved through immediate-release mandates and tackle-design requirements than through a categorical gear ban that imposes sweeping burdens on unrelated fisheries. The limitation of wire and hook size does NOT prevent anglers from targeting white sharks with monofilament and smaller hooks.

VI. IF ADOPTED, THE REGULATION SHOULD BE LIMITED TO PIERS, NOT ALL SHORE-BASED ANGLING

Should the Commission determine that some form of emergency gear restriction is warranted, it should be confined to **man-made pier structures only**, rather than the full

sweep of beaches, banks, jetties, breakwaters, and 1,000 yards of nearshore water currently proposed. There is a strong, defensible rationale for this narrower scope:

- Every documented incident cited in the Department's own findings — the April 2026 Hermosa Beach Pier event and the 2014 Manhattan Beach Pier swimmer-bite incident — occurred at a pier. No incident cited in the staff summary or emergency findings occurred from a beach, jetty, or open surf-casting position.
- Piers provide unique access to deeper water and structure that concentrates juvenile white shark aggregations within easy casting range of stationary, heavy-tackle anglers. Surf and jetty anglers casting from the beach do not have comparable access to the deep-water aggregation zones where these incidents occur.
- Piers are fixed public structures with defined boundaries, making a gear restriction straightforward to post, communicate, and enforce — unlike a 1,000-yard nearshore zone spanning hundreds of miles of variable, unmarked coastline.
- Public safety risk from a hooked shark or trailing wire leader is meaningfully higher on piers, where swimmers, waders, and other beachgoers are concentrated directly beneath and adjacent to elevated anglers fighting large fish — the exact mechanism of harm in the 2014 incident. This risk is structurally different from, and greater than, the risk posed by a surf angler whose hooked fish remains in open water away from concentrated foot and swim traffic.
- Limiting the restriction to piers would preserve the surf- and bank-based leopard shark, sevengill, and soupfin fisheries described in Section I almost entirely intact, since the large majority of that angling occurs from open beach and bank positions, not pier structures. In addition, anglers fishing from shore (non-pier) are able to dehook and release their catches with proper protocol to ensure the vitality of the animal.

A pier-only restriction would directly target the locations where the Department's own cited evidence shows the problem is actually occurring, while leaving the broader surf, bank fishery, and the conservation-minded anglers who sustain it, undisturbed. This is precisely the kind of narrowly tailored alternative that emergency rulemaking is supposed to favor over a blanket, coastline-wide prohibition.

VII. PROCEDURAL CONCERNS: EMERGENCY RULEMAKING BYPASSES REQUIRED PUBLIC PARTICIPATION

California Government Code Section 11346.1 requires a finding that a regulation is "necessary for the immediate preservation of the public peace, health and safety, or general welfare" to justify bypass of standard rulemaking notice requirements. The recreational fishing community — the primary stakeholder class affected by this regulation — has been given no meaningful opportunity to participate in its

development, challenge its scientific premises, or propose alternatives. This is precisely the population whose behavior the regulation targets, and precisely the community that has the most relevant practical and ecological knowledge of the relevant fisheries.

The Commission should decline to adopt this regulation as an emergency measure and instead direct the Department to pursue an expedited but properly noticed rulemaking with a focused public comment period, stakeholder workshops with the elasmobranch angling community, and a full Economic Impact Assessment consistent with the California Administrative Procedure Act.

CONCLUSION

The proposed emergency amendment to Sections 28.06 and 28.65 reflects a legitimate conservation impulse, but it is executed through an instrument that is far too broad, bypasses required public process, and will eliminate lawful, ecologically conscious fisheries that are not responsible for the documented harm. Three white shark deaths as regrettable as they are ; do not constitute an emergency requiring the wholesale elimination of wire leader and large-hook angling from more than 400 miles of Southern California coastline.

I respectfully urge the Commission to reject this emergency rulemaking in its current coastline-wide form. If the Commission determines that some emergency action is warranted, it should, at minimum, narrow the restriction to pier structures only, where the documented incidents actually occurred, rather than imposing a blanket prohibition across all shore-based fishing ,surf, bank, and jetty alike ; over more than 400 miles of coastline. I further urge the Department to pursue a properly noticed, stakeholder-informed rulemaking process for any longer-term regulation, one that protects juvenile white sharks without eliminating lawful, ecologically conscious shark and ray angling in California.

Respectfully submitted,

Ryan Le

Laboratory Analyst — Wet Chemistry | Onterris

Researcher — FABB Lab, Department of Biological Sciences, CSU Fullerton

(Sevengill shark & Sixgill population genetics, Southern California Bight — CA DFW Scientific Collection Permit)

Garden Grove, California

-----Original Message-----

From: Luke Totah

Sent: Monday, June 22, 2026 7:47 PM

To: OAL Reference Attorney@OAL <OALReferenceAttorney@oal.ca.gov>; FGC <FGC@fgc.ca.gov>

Subject: Emergency Regulations: Recreational Gear Restrictions for White Shark

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Hi,

My name is Luke Totah and I live in San Diego. My favorite fishing here in San Diego is surf fishing. I have a daughter who will be 2 years old soon and a son on the way this November. One of my favorite things to look forward to as my kids grow is fishing with them. The one thing that does bring me the most joy in life is when I go shark fishing here in San Diego. I think they are just beautiful creatures which is why I love catching them. I also always catch and release. So I am writing to you because I truly don't understand why removing wire leaders is going to solve regulations on white sharks. Here are some of my questions/ statements I have...

1. Most of the time I only catch leopard sharks and I've never even seen a white shark in the first place - so what data is being used to make this decision?
2. I surf fish often and other than the few friends I do fish with, I hardly ever see any other shark fishermen. I also go to multiple beaches throughout the year so I don't have a "secret spot". And with the FEW people I do see who shark fish, I have yet to find someone who doesn't practice catch and release. So what data do you have the shark population in general needs these regulations?
3. After copious amounts of research I have done I have seen no data proving these regulations need to be in place. With that said, these regulations seem unjust! It makes me feel like the people who are creating these regulations truly haven't done any research themselves. I frequently snorkel around La Jolla cove to watch the leopard sharks to admire these creatures. Let me tell you, sharks are flourishing all up this coast. So, wouldn't you agree this regulation is unjust?
4. I truly feel like these regulations will cause more harm for sharks than help them. It is a huge passion of mine and I can't wait to show my kids these incredible creatures. So, if this regulation gets passed, I would happily get a strong mono line to continue this passion. Unfortunately this would mean more hooks will get bitten off and more sharks left around the sea with hooks in their mouths causing further damage. How will multiple white sharks with hooks in them help them?

5. White sharks are already protected in California. So what makes you think removing wire leaders will protect them further?

6. Leopard sharks and Soupfin sharks are legal species we can target here in San Diego. So this regulation negatively impacts legal and lawful fishing which is unjust!

7. Since there are such a small amount of shark fishermen I know up the coast, you're wildly punishing all those responsible fishermen who know how to safely fish, practice catch and release, and continue to protect these amazing creatures.

8. As I mentioned before, there is a huge lack of evidence for why these regulation needs to be in place. What I have read was how in the past decades the white shark population actually is being seen more often than ever! So if that is the case, why are these regulations being enforced?

At the end of the day I feel like this will cause more harm to the beautiful shark population. I highly ask you to rule against these regulations as it can cause more harm and is unjust!

Thank you from a fellow fishermen,

Luke

Sent from my iPhone

From: Philip Wright

Sent: Monday, June 22, 2026 07:50 PM

To: OAL Reference Attorney@OAL <OALReferenceAttorney@oal.ca.gov>; FGC <FGC@fgc.ca.gov>

Subject: Please Revise the ban on hook diameter and wire leader

I am writing as a regular recreational angler who fishes inside Morro Bay, California. I strongly oppose the emergency gear restrictions capping hooks at a maximum 1.5-inch inside diameter and banning wire leaders. While the stated goal is to protect white sharks, this blanket rule will cause severe, unintended harm to legal, sustainable shark fisheries like soupfin and sevengill sharks. Forcing land-based and nearshore anglers to use tiny hooks under 1.5 inches does not stop large sharks from biting; it simply ensures that when they do bite, they will completely swallow the small hook. This results in severe gut-hooking, internal bleeding because of people switching to J hooks,—the exact opposite of ethical catch-and-release conservation. Furthermore, combining a mandatory small hook with the required heavy 200 lb fluorocarbon leader needed to withstand shark teeth creates a mechanical impossibility. The thick diameter and crimps of 300 lb line entirely choke out the gap of a small hook, preventing clean corner-of-the-mouth jaw sets and leading to torn fish jaws or lost gear left in the water. A traditional 8/0- 10/0 inline circle hook is a proven conservation tool that inherently prevents gut-hooking and can atleast allow fishing for seven gills and soupfins. Maybe also reducing the strength of wire leaders to maximum 210lbs. And also forbidding the use of certain baits. I urge the Commission to reject this blanket gear ban and try a different way.

Sincerely, Philip Atascadero CA

From: Thomas Campion [REDACTED]

Sent: Sunday, June 21, 2026 4:38 PM

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

Subject: Emergency Regulations: Recreational Gear Restrictions for White Shark

California Fish and Game Commission

Attn: Jenn Bacon

I just learned of the potential new emergency regulations, banning wire leader and hooks over 1.5 inches used in shark fishing.

While the stated intent (to protect white sharks) is noble, the result of this ban will be catastrophic.

I have shark fished, and like most experienced anglers, I've practiced catch and release.

Proper gear with appropriate wire leader and sized hooks leads to limited harm (if any at all) to the catch before and during hook removal

and release.

Current hooks are usually embedded in the side or front mouth area. This enables the easy removal of the hook from the catch.

If the emergency regulations take effect, fishing will continue, but a large percentage of the sharks caught will have swallowed the smaller

hooks more deeply into their anatomy. Perhaps even into the stomach. Removal of such hooks is dangerous for the angler and

potentially very harmful to the catch, if it can be done at all. Likewise, the different leader will result in scratches and abrasions on the fish.

This new regulation designed to prevent harm to one species caused by a few fishermen, will result in untold harm as an unintended side effect

to many other species. Please reconsider this regulation and devise one that deals directly with the problem at hand without creating new ones.

I respect many of the governmental regulations to protect state fisheries, but in my opinion this one is misguided and counterproductive.

Thank you for addressing this.

Sincerely,

T. Campion

San Diego County, Ca.

-----Original Message-----

From: Cameran Cochran

Sent: Friday, June 19, 2026 11:14 AM

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

Subject: Subject: Opposition to Proposed Emergency Regulations – Sections 28.06 & 28.65 – Recreational Gear Restrictions for White Shark

Dear California Fish and Game Commission,

My name is Cameran and I'm a recreational angler based in San Diego County. I fish the Oceanside Pier regularly and spend a lot of my time land based shark fishing up and down the San Diego coastline. I'm writing because I have serious concerns about the proposed emergency regulations under Sections 28.06 and 28.65.

I want to be clear — I have no interest in targeting white sharks. Nobody I fish with does either. When I'm out on the pier or fishing the beach, I'm targeting leopard sharks, sevengills, smoothhounds, and other legal species that California waters are full of. That's what the vast majority of shore anglers down here are doing. To paint us all with the same brush as the few bad actors who are intentionally going after white sharks is frustrating and honestly pretty unfair.

Banning wire leaders and restricting hook sizes south of Pigeon Point doesn't just inconvenience us it makes it nearly impossible to fish for the species we're legally allowed to target. Wire leaders aren't some secret weapon for catching white sharks. They're a basic, responsible piece of tackle that any shark angler uses to get a clean catch and release without damaging the fish or the gear. Taking that away doesn't protect white sharks, it just punishes people like me who are already following the rules.

If the Commission wants to address the problem of people illegally targeting white sharks, I'd ask that you focus on enforcing the laws that already exist, increase education at popular fishing spots, and work with the fishing community directly before rolling out a blanket ban that affects everyone. Limiting any restrictions to specific areas and times where juvenile white shark aggregations are actually being documented would make a lot more sense than shutting down an entire region for all shark anglers.

I care about the ocean and I want white sharks protected just as much as anyone. But these regulations go too far and they're going to hurt a community of responsible anglers who have nothing to do with the problem you're trying to solve.

Please reconsider this emergency action and give the fishing community a seat at the table before moving forward.

Thank you,

Cameran

San Diego County

-----Original Message-----

From: Felix Miller [REDACTED]

Sent: Sunday, June 21, 2026 1:09 PM

To: OAL Reference Attorney@OAL <OALReferenceAttorney@oal.ca.gov>; FGC <FGC@fgc.ca.gov>

Subject: White shark emergency regs

Dear commission,

I believe that passing the proposed regulations of banning cable leaders and hooks bigger than 1.5" would be a terrible mistake. While I understand the intention is to protect white sharks, these regulations would have much wider effects. There are numerous other legal shark species that are extremely difficult to successfully catch with cable leader and big hooks, such as mako sharks, prickly sharks, sixgill sharks, sevengill sharks, blue sharks and even large thresher sharks and soupfin sharks. There are already existing regulations in place to protect white sharks such as prohibiting intentionally targeting white sharks and no shark fishing within 1 mile of any known white shark presence. These regulations would severely compromise anglers' ability to target any of the large shark species I listed. Some people depend on these species for food to feed themselves and/or their families. Others such as myself just like to fish for them recreationally and should have every right to do so. Some of the examples that were cited were also very troubling to me.

To start with, the example of the swimmer being bitten by a hooked white shark at Manhattan Beach was an egregious and one off scenario. In order to have been hooked off the pier, the shark had to have already been near the shore to begin with, as are thousands of other white sharks along the California coast. The angler can not possibly be considered at fault for this event.

In the other case of the 20 white sharks being caught off the Hermosa Beach Pier, all that shows to me is an egregious failure to enforce existing laws. Every single person on that pier that landed a white shark with the exception of the first one was breaking an already existing law of not shark fishing in the known presence of white sharks, but as far as I know, no disciplinary action was handed down for this event, and it was instead used as an example to pass new laws that would not have resulted in a better outcome.

And the last and most egregious case was last winter when anglers gaffed and killed a white shark at the seal beach pier. An individual employed by the Department of Fish and Wildlife was called to the scene, only to misidentify the shark as a mako and impose no disciplinary action on the individuals who committed this serious offense. Anglers should not be punished for the Department's failure to enforce existing laws, and as for the anglers mentioned and others that commit similar offenses, they are not in any way representative of shark anglers in California and are instead a few outlying individuals.

The vast majority of shark anglers follow existing laws, whether they are enforced or not, and they should not be punished for the mistakes of a few uneducated individuals. And as for the actual gear restriction, only allowing monofilament lines and small hooks is not going to stop any white sharks from being hooked. What it will do, is cause much more of them to break off and be left with hooks in their mouths, and the few that are reeled in will be subjected to a much longer fight due to the lighter tackle used, which will lower their chances of survival upon release.

What I propose should be done instead is placing a ban on any stainless steel hooks, which take much longer to rust out in a sharks mouth, as well as encouraging any angler that incidentally bycatches a white shark to remove the hook whenever possible instead of cutting the line, which will be better for the sharks.

I also believe that existing regulations need to be better enforced, which will prevent incidents such as the Hermosa Beach Pier incident and the Seal Beach Pier incident from happening again. I believe the proposed regulations will have devastating effects on anglers and actually on white sharks as well, and I urge you to reconsider them for the sake of all.

From: beingkyant@gmail.com [REDACTED]
Sent: Friday, June 19, 2026 9:25 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Potential regulatory changes (steel leader ban)

Hello,

I have been keeping up to date with the recent regulations and potential changes coming to CA fishing and I must say as a commercial and sport fisherman I'm very disappointed in the problem solving at hand. I read an over all ban to metallic leaders as a whole? This seems very very counterproductive to me as this takes away a MASSIVE fishery especially for those fishing off the piers in California. I assume this is to prevent the targeting of great whites?

I find this to be incredibly ironic though seeing as Fish and Game approved the harvest of a great white shark off of Seal Beach pier less than a year ago. To me that is a much larger problem than using steel leader as a whole. I truly believe that if officers are more informed as to the way people target great whites and even what they look like that would solve the problem much more effectively than banning an entire way of fishing to essentially the whole state. This prevents targeting very much legal species to harvest such as 7 gill, soupfin, leopard shark, and some people even use steel leader for thresher.

I am in full agreement that targeting whites in California is definitely a problem and one that needs to be addressed but this is truly in no way shape or form the way to handle it. I'm additionally included a picture of the event I'm speaking of on Seal Beach, which was honestly a VERY disappointing thing to hear of seeing as that is an absurd level of ignorance at hand from someone who holds so much jurisdiction over our waters. If you need more photos of the event I have many, including multiple with officers and a video of one saying that it was in fact a mako.

5:11

5G 64



Mako 😂

Send message...

