

Appendix A. Public Input (click on title to return to contents)

This appendix includes a description of the sources of public input during the development of the Draft Nearshore Fishery Management Plan (Draft NFMP), and the comments received on the Draft NFMP. The NFMP is an environmental document under the California Environmental Quality Act.

A.1 Summary of Public Hearings and Meetings

A.1.1 Nearshore Fishery Management Plan Advisory Committee Meetings

The Nearshore Fishery Management Plan Advisory Committee provided advice throughout the development process; five meetings were held prior to issuing the Draft NFMP. All the meetings of the Advisory Committee were open to the public, and a public comment period was provided at each meeting.

A.1.1.1 Meetings prior to issuing the Draft Nearshore Fishery Management Plan

26 January 2001

The first meeting of the NFMP Advisory Committee was held at the California Department of Fish and Game (CDFG) office in Los Alamitos. One of the primary objectives of the meeting was to review, discuss, and receive comments on the conceptual framework for the NFMP. The conceptual framework: 1) identifies the species covered by the NFMP, 2) describes the reasons for the development of the NFMP and the problems to be addressed, 3) specifies the goals and objectives of the NFMP, 4) outlines the contents and scope of the NFMP, and 5) discusses the concept of regional management. Another objective of the meeting was to receive the Committee's input on the public meetings to discuss the conceptual framework.

29-30 March 2001

The Advisory Committee met at SRI International in Menlo Park. The Committee was asked to assist in: 1) finalizing the problem statement and the goals and objectives for the NFMP, and 2) deciding the management approaches that would be analyzed in more detail for the NFMP. The Committee revised the problem statement, and a workgroup was formed to help with the revision of the goal and objectives. Five aspects of fishery management were discussed: harvest control rules, allocation, marine protected areas, regional management, and restricted access. Prior to the meeting, the Department provided the Committee with an issue paper for each topic. The issue papers provided a discussion of issues and possible approaches (or alternatives). The approaches presented in the issue papers were developed from input from numerous sources including: comments from the Advisory Committee and a working group of the Advisory Committee that met via conference call, comments received at the three Scoping Workshops held in February, comments received during the small group conversations held in the spring and summer of 2000, issues raised on CAnearshore listserv, and comments received during the development of the interim regulations in the summer and fall of 2000. During the meeting the Committee focused on identifying approaches that should be added and those that should receive

additional analysis. The Committee did not complete its discussion of allocation and decided to focus on allocation at a meeting in April 2001.

20 April 2001

The Committee met at the CDFG office in Los Alamitos to continue the discussion on allocation that was begun at the March meeting. The Committee reviewed each allocation approach and identified advantages and disadvantages on both a statewide and a regional basis. A member of the public made a presentation during the public comment period.

23-24 May 2001

The Committee was sent a preliminary working version of the Draft NFMP for review. The Committee then met at the CDFG office in Los Alamitos. The Committee chose to focus its discussions on the following chapters: 2 - Fishery Management Program; 9 - Implementation Requirements and Costs; 10 - Research Protocols; and 11 - Future Management Considerations. The comments by the Advisory Committee were used to help improve and refine the document.

12-13 July 2001

The Committee met in Oakland to discuss DFG's proposed approach for developing regulations to implement the NFMP. The DFG proposed initially focusing on only those regulations that are needed to implement the NFMP. These include regulations establishing the harvest control rules, allocation, and regional management, and also include regulations to begin restricted access. The interim regulations that were established in 2000 would be left in place for one more year unless a specific need or problem is identified. Working drafts of the proposed regulations and other background materials were sent to the Committee prior to the meeting.

A.1.1.2 Meetings after issuing the Draft Nearshore Fishery Management Plan

20-21 September 2001

The Committee met in San Diego to discuss the draft NFMP and receive updates on various topics related to the NFMP. The Committee was sent the draft NFMP prior to the meeting. Individuals had an opportunity to express their thoughts and concerns about the draft NFMP, and then the group discussed key issues (such as harvest control rules, the use of MPAs, restricted access, allocation, and public outreach). The Committee recommended going forward with interim regulations to reduce latent capacity in the commercial nearshore fishery; specifically, continue the moratorium on issuing new permits and establishing a minimum landing requirement, either prior to the year 2000 or prior to the control date. The Committee did not reach a consensus on the harvest control rules or the use of MPAs in the harvest control rules. The Committee reached full a consensus in support of the DFG's preferred alternative for regional management. Fourteen Committee members supported (with the two environmental representatives abstaining) the DFG's preferred approach for allocation.

A.1.2 Marine Life Management Act Evaluation Advisory Committee

At the 8 February 2001 meeting of the Marine Life Management Act Evaluation Advisory Committee (MLMAEAC), the Committee reviewed the 2 February 2001 working draft of the goals and objectives for the NFMP. This was the same draft that was reviewed at the three public Scoping Workshops that were held in February. The Committee discussed the goals and objectives and provided advice on the function of the goals, the format, how to handle conflicting objectives, and goals and objectives that should be added. In addition, the Committee provided advice on a variety of other issues related to the NFMP.

A.1.3 Public Meetings

The public meetings were held before the Draft NFMP was written. The function of the public meetings was to receive input early in the development of the NFMP.

Small Group Conversations on the Nearshore Fishery: May-June 2000

A series of conversations was held with small groups of constituents in 13 locations from Crescent City to San Diego in May and June of 2000. A diverse group of constituents was invited to the conversations, and they provided perspectives of recreational anglers, recreational divers, conservation groups, commercial harvesters, commercial passenger fishing vessel operators, fish buyers, tackle and dive shop owners, and harbor districts. Participants offered opinions and suggestions on the content of the NFMP, the goals and objectives of the NFMP, management approaches, and the range of issues to be addressed by the NFMP. Participants also provided valuable insights on ways to improve constituent involvement during the development of the NFMP.

Scoping Workshops: 7, 10, and 13 February 2001

The Department held three Scoping Workshops regarding the development of the NFMP in February 2001: 7 February in Santa Rosa, 10 February in Monterey, and 13 February in Long Beach. Each workshop lasted 3 hrs. The purpose of these workshops was to introduce the public to the Department's approach to developing the NFMP and potential management approaches, and to receive input from the public on the Department's approach and on management options. Workshop announcements were mailed to approximately 2,900 individuals and groups, including recreational anglers and divers, commercial nearshore permit holders, environmental organizations, and the news media.

At each workshop, Department personnel gave presentations on the proposed outline for the NFMP, the problem statement, the proposed species to include in the NFMP, the goals and objectives, the concept of regional management, and management approaches. The public was asked to give the Department their comments, concerns, and suggestions on these topics. Approximately 110 people attended the workshops, with 68 providing comments. In addition, written comments were accepted. Each workshop had its own regional concerns, but overall the themes were similar. Comments, concerns, and suggestions were provided on the outline, the concept of a framework plan, the problem statement, the list of species, the goals and objectives, harvest control rules, allocation, restricted access, marine protected areas,

regional management, management tools and techniques, science and data, and the process for developing the NFMP.

Public Meeting on Management Approaches: 3 April 2001

The Department held a public meeting to solicit input from all interested members of the public regarding the management approaches for the NFMP. Meeting announcements were mailed to approximately 2,900 individuals and groups, including recreational anglers and divers, commercial nearshore permit holders, environmental organizations, and the news media. All materials for the meeting were posted on the Department's web site, and sent to all participants of the Scoping Workshops. The meeting materials included issue papers on harvest control rules, allocation, marine protected areas, restricted access, and regional management. The issue papers provided a discussion of issues and possible approaches (or alternatives). The approaches presented in the issue papers were developed from input from numerous sources including comments received from the Advisory Committee, at the three Scoping Workshops held in February, during the small group conversations held in the spring and summer of 2000, and during the development of the interim regulations in the summer and fall of 2000. At the meeting, Department personnel summarized the possible management approaches. Comments were received on harvest control rules, allocation, marine protected areas, restricted access, and regional management. In addition, written comments were accepted on these topics.

A.1.4 Fish and Game Commission Meetings and Hearings

All the Fish and Game Commission meetings and hearings were held after the Draft NFMP was issued. The Commission held four special hearings to receive comments on the Draft NFMP, and received comments at three of its regularly scheduled meetings.

A.2 Persons, Organizations, and Public Agencies Commenting on the Draft Fisheries Management Plan

A.2.1 Advisory Committee for the Nearshore Fishery Management Plan

Environmental

Ms. Karen Reyna, Member
Pacific Ocean Conservation Network
San Francisco

Ms. Kate Wing, Alternate
Natural Resources Defense Council
San Francisco

Mr. Joe Geever, Member
American Oceans Campaign
Playa de Rey

Alternate position - vacant

Recreational

Mr. Paul Kirk, Member
Angler
Eureka

Alternate position - vacant

Mr. Mike Malone, Member
Angler
Sebastopol

Mr. Bob Strickland, Member
Angler
San Jose

Mr. Jim Webb, Member
Angler
Cambria

Mr. Art Kvaas, Member
Angler
Santa Barbara

Mr. Eric Frasco, Member
Diver
Manhattan Beach

Ms. Barbara Griffith, Member
Angler
Escondido

Commercial

Mr. Kenyon Hensel, Member
Fisherman
Crescent City

Mr. Jim Bassler, Member
Fisherman
Fort Bragg

Mr. Larry Wong, Member
Fisherman
San Francisco

Mr. Bill James, Member
Fisherman
Pismo Beach

Mr. Chris Hoeflinger, Member
Fisherman
Ventura

Mr. Bruce Campbell, Member
Fisherman
Vista

Ms. Donna Solomon, Member
Buyer
Moss Landing

Mr. Bob Humphrey, Alternate
Diver
Pleasant Hill

Mr. Richard Oba, Alternate
Angler
Richmond

Mr. Ron Massengill, Alternate
Angler
Cambria

Mr. Tom Ball, Alternate
Angler
Santa Barbara

Mr. Paul Meister, Alternate
Diver
Manhattan Beach

Mr. Jim Wilson, Alternate
Angler
Tustin

Mr. Don Stanley, Alternate
Fisherman
Eureka

Mr. Dan Platt, Alternate
Fisherman
Fort Bragg

Mr. Lou Ferrari, Alternate
Fisherman
San Francisco

Alternate position - vacant

Mr. Jim Colomy, Alternate
Fisherman
Santa Barbara

Mr. Roger Healy, Alternate
Fisherman
Laguna Beach

Mr. B.J. Johnson, Alternate
Buyer
Nipomo

Commercial Passenger Fishing Vessel Operators (Charter Boats)

Mr. Robert Ingles, Member
Half Moon Bay

Mr. Darby Neil, Alternate
Morro Bay

Mr. Robert Fletcher, Member
San Diego

Mr. Paul Strasser, Alternate
San Pedro

Academic

Dr. Ralph Larson, Member
Department of Biology
San Francisco State University

Dr. Gregor Cailliet, Alternate
Moss Landing Marine Laboratories

Dr. Christopher Lowe, Member
Department of Biological Science
California State University, Long Beach

Dr. Todd Anderson, Alternate
Department of Biology
San Diego State University

A.3 Peer Review Comments

Draft Summary of Review Comments, Nearshore Fishery Management Plan

The following review of the Nearshore Fishery Management Plan is submitted in response to Section 7062 of the California Marine Life Management Act (MLMA), which requires external peer review of certain state documents including Fishery Management Plans. These comments refer specifically to the Nearshore Fishery Management Plan (the Plan) and are consolidated from reports and discussions among a diverse group of six scientists involved in fisheries matters (see appended C.V.s). The Plan provided by the Department of Fish and Game (DFG) for distribution to the reviewers did not contain Chapter 10, which addresses (albeit vaguely) some of the concerns raised in the review. All of the reviewers acknowledged that the Plan represented a monumental effort and that many parts of it, especially the compilation of background information, were well done. Most of the main points of criticism of the Plan fell into two broad categories: *Plan Organization and Approach* and *Data Concerns*.

Plan Organization and Approach

In the opinion of the panel:

- The criteria used to select the 19 species to be managed under the Plan were questionable, resulting in omitting a number of highly significant species (*e.g.*, kelp bass, lingcod, surf perches, croakers, California halibut) while including some of less significance (*e.g.*, monkeyface prickleback).
- The Panel believes that effort reduction should be an important goal of the Plan, given that little is known about biomass or appropriate harvest rates of nearshore species. The Plan lacks specifics on how effort can be reduced. It should include an array of effort reduction actions that could function in data-poor (stock assessment) situations.

- The Plan places emphasis on using marine protected areas (MPAs) as a management tool, both for conservation purposes and to estimate unfished biomass densities of nearshore species. However, there is insufficient discussion about corresponding conservation (*e.g.* reductions in effort and/or removals) in unprotected areas. Also, there is little discussion about the timeframes involved in using MPAs to estimate unfished biomass densities. For long-lived species with inconsistent recruitment, decades may pass before fish densities in a MPA returns to unfished levels. The Plan does not address how unfished biomass will be estimated in the interim.
- There was a consensus that 10% of nearshore habitat (north) and 15% (south) would not offer adequate protection if overfishing occurred outside the MPAs. Definitions, management, and distribution of MPAs need to be linked to the Marine Life Protection Act (MLPA).
- Oceanographic and ecological considerations suggest that the California coast should be divided into two distinct regions: one from the Oregon border to Point Conception and the other from Point Conception to Mexico. In the northern region, the nearshore environment favors features adapted to strong coastal upwelling and close proximity to the California Current, whereas in the southern region it favors features adapted to a closed, cyclonic eddy. Each of these very different environments has favored distinctive life-histories and therefore, different species.
 However, some panelists pointed out that because of the very limited home range of some species and the potential for serial depletion, the coast should be divided into smaller subdivisions. If the division of the coast into three regions was based on considerations other than geographical boundaries that differentiate stocks of species (*e.g.*, differences in fishing fleets, societal needs, or providing income for coastal communities), the considerations should be stated and the rationale clarified.
- The Plan should clarify the decision making process. There are places throughout the Plan where flow charts (similar to the one on page 9-12) or decision trees could be used to elucidate material that now is described in text narrative.
- The Plan proposes several programmatic alternatives that would set harvest levels based on a target exploitation rate as modified by a 40/10 harvest control. As in the Council's harvest policy for groundfish, under the Plan's control rule the target exploitation rate for a stock is reduced when the stock drops below 40% of its unexploited level, and there is no exploitation when the stock drops below 10% of its unexploited level. The Plan specifies that the target exploitation rates would be based on $F_{50\%}$ for the nearshore rockfish species and $F_{45\%}$ for the other species, identical to the Council's default exploitation rates. The Plan provides no support that these exploitation rates, which were derived for the deepwater species, are appropriate for the aggregation of 19 species. Also, given the lack of reasonably accurate information on historical removals of the individual nearshore species, and corresponding data on changes in their abundance, it

probably is not possible to estimate the unfished biomass of any of the 19 nearshore species.

- All reviewers thought that the Plan could be better organized. As stated previously, the most prevalent suggestion was to use tools such as decision trees, flow charts, and matrices to better show how approaches and alternatives mesh. Key elements of the Plan are not clearly identified and are often hard to find. The definition of goals and objectives is inconsistent in different parts of the Plan.

Data concerns

In the opinion of the panel:

- The Plan cannot be implemented successfully without better data on fish removals (*i.e.*, the biomass that is removed from a stock per unit time). The reviewers believe that the DFG needs to place greater emphasis on improving removal estimates both in the commercial and recreational fisheries. This is one of the largest deficiencies in the plan.
- There must be some provision in the Plan to implement and support ongoing assessments of relative abundance. Harvest control rules are based on Optimum Yield (OY) and Maximum Sustainable Yield (MSY), which cannot be determined without relative abundance estimates. The Plan estimates OY and MSY by using catch statistics from 1993 - 1998, and setting an OY proxy at 50% of these recent catch levels. That time period contained the highest reported catches in some portions of the coast. There are no data to support the assertion an OY proxy of 50% of 1993 - 1998 catches is or is not a sustainable harvest rate.
- The Plan does not identify a source of funding for collecting, maintaining, and analyzing essential fishery information (EFI). The MLMA requires that DFG obtain EFI for all marine fisheries managed by the state [FGC §7060(a)(b)]. For the Plan to be considered credible, it should acknowledge the difficulty in obtaining essential fishery information for the large number of species inhabiting nearshore waters. There must also be an identified strategy and financial commitment to improve acquisition of fishery dependent and fishery independent data.

The following issues were addressed by the panel in additional detail:

Serial Depletion and Stock Assessment

Unless it can be shown that the thirteen species of rockfish covered by the Plan are of equal resilience they shouldn't be managed as if they were a single species. The likelihood is that the favored (most valuable) and/or least resilient species would be overfished, and that the Plan would fail to protect the weaker stocks.

The Plan offers no details about how, given data-poor conditions, it will be determined that a stock is overfished. If a stock is determined to be overfished and harvests are curtailed, how will it be determined if and when the stock has rebuilt to a

level that will again permit harvesting? The Plan should discuss how DFG would be able to get resources (staffing/financial) to do the assessments, and how they would be carried out if resources were available.

It was questioned whether DFG could get fishery dependent and independent data simultaneously. Because of the nature of the stocks, DFG needs to gear up for a consistent, long-term data collection effort that would last a minimum of 20 years. It was suggested that an effort to amass and mobilize a volunteer data-gathering team might be beneficial. The Plan should discuss how DFG will integrate with and exploit historical and existing sampling programs such as CalCOFI or the NMFS juvenile rockfish survey.

Analysis of the Alternatives

The backbone of the Management Plan is contained in Chapter Two, "Fishery Management Program." This chapter is confusing and needs to be reorganized to make it easier to understand the decision points and the management measures that would be triggered at each point.

The panel concluded that Alternatives 1 and 3 may not meet the requirements of the MLMA. Alternative 1 might continue to deplete the stocks. Alternative 3 (a maximum of 4 lines per vessel and 2 hooks per line) would likely eliminate commercial fishing as a viable industry.

Alternative 2 relies on MPAs to enable depressed stocks to recover. This might achieve the conservation goals of the MLMA, but it would create substantial social and economic disruption. There is insufficient information about how the Plan will address social and economic issues.

Since Alternative 4, the preferred alternative, might be the only one that would comply with the law, the discussion of alternatives should include only the different ways that Alternative 4 would be applied in differing situations.

It was suggested that for each viable management alternative there should be a formal analysis of how the alternative will conform to each objective of the MLMA.

Allocation/Restricted Access Issues

A goal of the Plan is fair allocation ["fair resource allocation" is required in §7086(c)(2) of the MLMA]. The panel felt that discussions about allocation must recognize that the stocks being allocated are a public trust resource, and that harvests rights are granted with the understanding that some benefit from use of the resource should accrue to the citizens of California, beyond those involved directly with fishing, processing, and marketing of fisheries products.

The Plan implies that restriction of commercial fisheries would meet the conservation goals of the MLMA, yet the impact of harvest on the fish resource is the same regardless of whether the catch was made by a recreational or commercial fisher. Discussion of allocation between recreational and commercial fisheries is inadequate.

Specific ways of implementing restricted access methods to achieve the effort reductions that are presumed with MPAs are not identified in the Plan, and should be. Different generic approaches are listed, and the preferred approach is a combination of all of them. However there is no guarantee that a 50% effort reduction would result from their implementation.

Restricted access principles should be better articulated and a flow chart or decision tree used to clarify application.

No goal for restricted access is identified (*i.e.*, achieve maximum net economic benefit, reduce bycatch, etc.).

An area-specific approach to restricted access should be discussed.

MPAs

All reviewers were concerned about the absence of a defined relationship between MPAs discussed in the Plan and MPAs in the MLPA. The goals and objectives of the MLPA should be included.

There was general agreement that any harvest inside MPAs would alter their ecological balances. At least one reviewer thought that no take (even scientific) should be permitted in MPAs.

There was doubt that the recommended area of MPAs [15% (south) and 10% (north)] would adequately protect some stocks because of their patchy distribution and unknown range of larval dispersal. A 10% to 15% MPA assumes that the remaining unexploited spawning biomass required for OY must survive to maturity outside of the MPAs. This rate of survival might be difficult to obtain for fish that are long lived and late maturing even with a 50% reduction in effort.

The placement and configuration of MPAs should conform to an experimental design and appropriate monitoring that will provide scientific information about the function of MPAs and how to make them more effective.

Constituent Involvement

Constituent involvement in the development of the Plan is described in the document, but the results are not. The details of public input should not only be identified, but it should be shown how its analysis influenced the evolution of the Plan, and will influence subsequent changes to the Plan.

Definition of Nearshore

In the Plan, nearshore is defined as the area from the high-tide line offshore to a depth of 120 feet. In the MLMA it is the area within one nautical mile of the coastline. This inconsistency in definitions should be resolved.

A.4 Comments Received and Response to Comments

Tables A-1, A-2, and A-3 are summaries of public comment received by e-mail, fax and mail, and comments made at the Fish and Game Commission public hearings.

Table A-1. Overview of Public E-mail Comments on the Draft Nearshore Fishery Management Plan. Written Comments from E-mails*			
FMP ELEMENT	FAVORABLE	UNFAVORABLE	OTHER
A) BACKGROUND	<p>a-Supports the plan which is proposed.</p> <p>b-Likes what is being proposed for managing Nearshore fishing.</p> <p>c-Support the proposed changes aimed at protecting our coastal resources.</p> <p>d-Expressed support for the cause; committed to conservation, preservation, and stability of all species.</p> <p>e-The ecosystem approach is especially admirable.</p> <p>f-Two-thirds of the 19 species are found in four or more National Parks in California; concerned they are managed in an ecosystem context.</p>	<p>a-There is a bias against the private sports fisherman.</p> <p>b-Don't kill the whole sport like you're doing.</p> <p>c-Plan slams the sport fisherman.</p> <p>d-Feels studies are flawed in that the Department only checks heavily used areas.</p> <p>e-Likes proposal but concerned over restriction it would place on spearfishing.</p> <p>f-Does not want to loose her (sport) fishing waters but did not want to speak because saw how the plan was more reaching than that.</p>	<p>a-Wants to see data on take of fish by recreational fishermen.</p> <p>b-Consider restrictions on the commercial fishing.</p> <p>c-What is solution regarding "livefishing?"</p> <p>d-Would like to see a example of the best available science the plan refers to.</p> <p>e-Questions accuracy of fish studies since the fish population is so mobile and often migratory.</p> <p>f-The cause of nearshore rockfish decline is due to commercial fishing and its gear for the live fish market. Stop scapegoating recreational fishermen.</p> <p>g-What are the pounds of fish caught by each group (commercial and recreational fishermen)?</p> <p>h-Believe that any regulatory decisions that causes a loss of income for a commercial fishermen must be based on reliable scientific data.</p> <p>i-Petition from approximately 1,295 individuals to end commercial fishing.</p>

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**B) HARVEST CONTROL
RULE**

a-Rockfish extracted from the nearshore by live fishers should be equated in number of fish caught-not metric tons.

a-Would like to see at least 50% of the nearshore fishery set aside.

b-Plan fails to recognize the potential effort shifts that will result from its implementation (concerned with shift to leopard shark and California halibut fisheries).

b-No commercial fishing within 3 miles except for salmon and crab.

c-Without a reduction in total fishing effort, this plan will only create further problems.

c-What is the DFG's solution regarding maximizing bag limits by CPFVs? Proposal's three rockfish per angler per day - as a possible discouragement to CPFVs.

d-If trying to deal with rockfish depletion in the nearshore through diminished take, etc., why should that eventual recovery be viewed as a "harvestable excess?"

e-How about a biomass trust fund for the nearshore leaving the MPA harvestable excess out of the loop (do not use excess except added to OY as a percentage every 5 years).

f-CPFVs should become a designated and redefined user group of the nearshore in contrast to individual sport fishermen or private boaters of the nearshore.

g-Also feels that for each coastal area, a maximum number of CPFVs should be determined.

h-Wants to be able to use the public resources that he pays the Department to manage.

I-Florida, Texas, and California have had success at reestablishing a fishery by curtailing the commercial fishing of fish stocks.

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<p>Alternative 1: No Change</p> <p>Alternative 2: Nearshore Finfish Conservation Areas</p> <p>Alternative 3: Gear</p> <p>Alternative 4: MSY/OY with MPAs (Preferred alternative)</p>	<p>a-Support the preferred alternative for managing the Nearshore fishery; add to it that (managers) be willing to reduce their annual salary by same percentage as reduced quotas on commercial fishermen.</p>	<p>a-Finds that the scope of the proposed “preferred” method almost completely ignores successes in fisheries management (East Coast, Gulf Coast and Florida)</p>	<p>j-If you restrict the small fisherman’s take, (do it by) restricting the annual take. Let him plan when and where he goes out.</p> <p>k-Supportive of the concept of conserving the marine environment, but would prefer to see reductions in commercial fishing, pollution, and reductions in the limits for recreational fishermen.</p> <p>l-(After a moratorium on commercial fishing) if commercial fishing is allowed, regulations such as the UASC gear restrictions must be in place to prevent serial depletion of reefs.</p> <p>m-Adopt a very precautionary approach toward public fishing of nearshore species until scientific research or other information demonstrates that fish stocks are rebounding.</p> <p>n-Keep door open to management options as different issues come along.</p>
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	<p>b-Supports the preferred alternative, with the provision that the MPAs be increased to between 25-30% of the total nearshore fishery area.</p> <p>c-Agrees that overall fishing effort would have to be reduced to not seriously impact the areas not in MPAs.</p> <p>d-Support the preferred alternative; the inclusion of reserves is an important component in fulfilling the goal of sustainable fisheries.</p>	<p>b-The preferred alternative is scientifically indefensible on (at least) two grounds:</p> <ul style="list-style-type: none"> • The MSY/OY numbers were calculated using a proxy based on the historical catch records over a period when fish stalks were in decline. • The Alternative relies on unproven effects of marine reserves. Marine reserves have shown strong increases in biomass within a reserve, the effects of reserves on fisheries outside the reserves are so far poorly understood.
<p>C) REGIONAL MANAGEMENT</p>		<p>a-DFG must stay true to the intent of the NFMP when it states, “regional management provides a means to make allowances for geographic differences”. Do not group waters north of Usal Creek with the central California zone.</p> <p>b-Most of the fish are basically central and northern California fish, why punish southern California fishermen?</p>
<p>D) ALLOCATION</p>		<p>a-Urges Commission to reject the preferred allocation scheme based on historic catch levels. What standard of fairness allows a few individuals to take approximately 50% of the fish.</p> <p>a-Adopt a moratorium on Nearshore commercial fishing until a time can be demonstrated a harvestable excess beyond resource conservation and public fishing needs.</p>

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		<p>b-Public fishing of these nearshore species generates far more jobs, tax revenues, other economic benefits and intangible benefits than the monetarily insignificant commercial fishery.</p>	<p>b-Commercial fishing should be able to harvest the excess above and beyond what is needed by the public fishery and resource conservation needs.</p>
<p>E) MARINE PROTECTED AREAS</p>	<p>a-To have a game preserve is one thin, and in the case of Fort Ross, probably a good idea.</p> <p>b-Supports necessary, temporary closures with objective targets set for when closures will be lifted.</p> <p>c-Fully supports efforts and urges Department to expand the planned protective zones.</p> <p>d-Supports reserves as a failsafe against management mistakes and environmental catastrophes and for research.</p> <p>e-(Supports) 10-15% marine reserves for research and backup.</p> <p>f-Highly supportive of expanding the state's system of MPAs to conserve target fish populations, preserve ecosystems, and improve forage for predators.</p>	<p>a-Objects to permanent reserves.</p> <p>b-To my knowledge there have been no successes at returning entire fish stalks linked to MPAs. Why then are we wasting time and valuable resources with unproven and at best localized success.</p> <p>c-To ban recreational fishing entirely by the use of no-take reserves is draconian and unfair. Allow recreational fishing only for migratory and pelagic species by creating conservation MPAs.</p>	<p>a-Supports the proposed changes to California's law aimed at protecting our coastal resources.</p> <p>b-Fishing for (species) other than the protected species in the MPAs would have to be closely monitored for impacts on protected species.</p> <p>c-When establishing reserves or preserves, please allow the recreational take of game fish for both angling and spear fishing.</p> <p>d-MPAs should be designed to include the waters adjacent to important breeding colonies and roosting sites as a means of improving forage conditions within close proximity of these areas.</p> <p>e-Urge the plan stress the point that fishing vessel disturbance can have significant behavioral impacts on seabirds.</p> <p>f-Strongly recommend that all seabird nesting areas and seal haul-out sites within National Parks (Cabrillo National Monument, Channel Islands National Park, Golden Gate National Recreation Area, Point Reyes National Seashore, and Redwood National Park) be given special protected status as fully protected marine reserves.</p>

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	<p>g-Encourage the Commission to designate waters in units of the National Park System as State Marine Reserves wherever possible; believes that a set aside of only 10% is proposed in northern California and believe it should be higher.</p> <p>h-Would like to see at least 50% of the Nearshore Fishery set aside.</p>	<p>g-Suggest that the use of buffer zones be instituted into the MPA recommendations in the NFMP.</p> <p>h-Propose that the NFMP should explicitly state the advantages of buffer zones in MPA design and implementation and that they are a critical feature of MPAs.</p> <p>I-Salmon trolling should not be prohibited in MPAs.</p>
<p>F) RESTRICTED ACCESS</p>	<p>a-Opposed to having to buy a recreational stamp to fund a study.</p>	<p>a-Believes if the Department decides to restrict fisherman's take it should be a restriction that would favor the small businessman. Do not make it so methods of mass destruction will...meet the quotas.</p>
<p>G) SOCIAL AND ECONOMIC CHARACTERISTICS OF THE FISHERY</p>	<p>a-If plan restricts fishing within 100 feet from shore, would stop diving and that would affect businesses.</p> <p>b-Have you asked counties if they would like the lost revenue?</p> <p>c-Should you go further than proper management, you would do further harm to the economy.</p> <p>d-Study after study has shown that the economic impact of commercial fishing is small in comparison to sport fishing.</p> <p>e-A social economic study of the impacted communities should be done prior to any completed plan.</p>	

Table A-1. Overview of Public E-mail Comments on the Draft Nearshore Fishery Management Plan. Written Comments from E-mails*

		<p>f-Money spent by recreational fishermen is 734M and commercial catch is 4M, why even bother with commercial fishing. Even a 10% reduction for each costs the state 73M + .4M, result in an economic slowdown.</p>	
<p>H) RESEARCH PROTOCOLS</p>		<p>a-Monitor the leopard shark fishery.</p> <p>b-More research needed before any (MPAs through the) MLPA are implemented.</p>	<p>a-Would like to see animal predation entered into the research side of the plan.</p> <p>b-As part of the ongoing FMP process, the CDFG and Commission should conduct or support seabird diet studies so that this information is available.</p>
<p>I) IMPLEMENTATION REQUIREMENTS AND COSTS</p>			<p>a-Hire more wardens.</p>
<p>J) FUTURE MANAGEMENT CONSIDERATIONS--PFMC</p>			<p>a-Commercially overfished much of the coast (drag nets and long lines used in closed sport season) and government should buy back the commercial fishing</p>
<p>K) OTHER ISSUES Environmental</p>	<p>a-The Draft covered very well and accurately the negative effects of human disturbance, including boats, on seabirds. These impacts need to be addressed in the FMP, with protections to important nesting and roost sites from close approaching vessels.</p> <p>b-The section (Effects on Seabirds) was reasonable well written with regards to breeding biology and needs on land.</p>	<p>a-Feels that the Nearshore Fishery is not only being exploited by human consumption, but also animal consumption, most notably the sea lion. Animal predation effect was not addressed.</p> <p>b-Plan does not adequately address the environmental impact to the non-excluded zones because of increased pressure (from) users being forced out of (other) zones.</p>	<p>a-Would like to stop tuna seiners.</p> <p>a-Conservation of rockfish as important seabird prey must be considered.</p> <p>b-If recreational and commercial fishing efforts affect the nearshore fishery negatively than they need to be accountable, but also the activities of others, such as; farming, industries, lumber companies, etc. need to be addressed.</p>

Table A-1. Overview of Public E-mail Comments on the Draft Nearshore Fishery Management Plan. Written Comments from E-mails*

	<p>c-Concur with section 8.3.1.</p>	<p>c-Very little attention was given to seabird foraging ecology, a topic of major concern with regards to the FMP.</p>	<p>c-Errors in Data:</p> <ul style="list-style-type: none"> • 8.1.42 Affected Environment: Seabird table listed as 7-2 in text, should be 8-2 • Table 8-2: Marbled Murrelets should be listed as state endangered and federally threatened. • Pinnipedia is a sub-order of Carnivora, not a separate order. • The Steller sea lion scientific name is Eumetopias jubatus, not Arctocephalus townsendi. • Northern fur seals (Callorhinus ursinus) is recognized as a depleted species by the Marine Mammal Commission and the National Marine Fisheries Service.
	<p>d-Concur with section 8.3.3.</p>	<p>d-The list of California seabird species in Table 8-2 was highly incomplete. Species to be added: Red-throated Loon, Horned Grebe, Eared Grebe, Red-necked Grebe, Laysan Albatross, Flesh-footed Shearwater, Short-tailed Shearwater, Buller's Shearwater, Long Tailed Jaeger, South Polar Skua, Mew Gull, Thayer's Gull, Sabine's Gull, Craveri's Murrelet, Ancient Murrelet.</p>	
	<p>e-Concur with section 8.4.1.</p>	<p>e-Section 8.1.4.1 Second paragraph: As written I got the impression that a species of special concern (SSC) must match all of the criteria listed; I believe that SSCs need only satisfy one of the criteria. This should be checked and corrected.</p>	
	<p>f-Concur with section 9.2.4.3.</p>	<p>f-As a group, the storm-petrels are described as "exclusively nocturnal". This is true regarding their activities at nesting colonies, but not at sea.</p>	

Table A-1. Overview of Public E-mail Comments on the Draft Nearshore Fishery Management Plan. Written Comments from E-mails*

	<p>g-Comments to correct information on cormorants, Xantus's Murrelets, Rhinoceros Auklets, Common Murres, and Western Grebes.</p> <p>h-Strongly disagree that impacts of vessel strikes and disturbances to sea birds poses no significant threat (section 8.1.4.4).</p> <p>l-Strongly disagree with section 8.1.5.6 regarding disturbances to haul-out sites.</p> <p>j-Concern with sections 8.2.4 and 8.4.4 regarding displacement of fishing pressure to areas near seabird habitat.</p>	
Enforcement		<p>a-Frequent and repeated longline violations within one nautical mile. Poaching is common in the "goldrush" atmosphere of the live fish market.</p> <p>b-Stringent fine schedules and examples should be set to stop disregard for laws.</p>
Regulations	<p>a-Regulations are confusing: size limits, identification of species.</p> <p>b-Opposed to fish law of 100 feet.</p>	<p>a-Manage the nearshore areas through seasons as done in hunting.</p> <p>b-Six regulations suggested:</p> <p>c-Manage by increase size limits and closing certain months to fishing.</p> <p>d-Feels Sheephead should be made a no-take species; they are rugged and easily released unharmed.</p> <p>e-Feels one of the most important restrictions is the banning of live bait for rockfish. Would like to see artificial lures only.</p> <p>f-White seabass: 1 per day all year Total limit of five fish per species Commercial fishing should also have limits.</p>

Table A-1. Overview of Public E-mail Comments on the Draft Nearshore Fishery Management Plan. Written Comments from E-mails*

<p>Fish Farms</p>	<p>g-Leopard shark: reduce sport limit to 2 fish.</p> <p>h-In the future much of our fish will come from fish farms.</p>
<p>L) COMMUNICATION</p>	<p>a-Hold meetings where you're talking about changing the rules.</p> <p>b-Feels people, whose livelihood the laws will impact, will not be available for the public input meetings because they were scheduled two days after the opening of lobster season.</p> <p>c-Concerned that fellow commercial fishermen have not had time to fully study and comment on this Plan.</p>
<p>M) MLPA</p>	<p>a-Opposed to closing all fishing from Big Flat Creek to Telegraph Creek and from Punta Gorda lighthouse to north of the Mattole River</p> <p>b-Proposal for no-fish zones in Monterey Bay: the public access would be severely restricted.</p> <p>c-More research before any MLPAs are implemented.</p> <p>d-Opposed to the closing of any fishing areas through the MLPA.</p> <p>e-Appalled at the proposal of restricting fishing to 3 miles out (La Jolla area). All out closures smell of extremism.</p> <p>f-If MLPAs are enacted, why do we need regulations on fish populations that will close so much coastline to fishing.</p>

Table A-1. Overview of Public E-mail Comments on the Draft Nearshore Fishery Management Plan. Written Comments from E-mails*

	<p>g-Opposed to the Marine Preserve plan as currently drafted. It does not adequately address two critical issues: economic impact to existing users and the environmental impact to the non-excluded zones.</p> <p>h-Alarmed by the proposal to close every one of favorite fishing spots; they are currently healthy and provide good fishing.</p>
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* E-mail comments received at NearshoreFMP.ca.gov address. Five e-mails that are duplicates of letters are not included in this table.

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

FMP ELEMENT	FAVORABLE	UNFAVORABLE	OTHER
A) BACKGROUND	<p>a-Glad that the Department is willing to try some innovative approaches to fisheries management.</p> <p>b-Supports the Department taking a more active role in nearshore fisheries management.</p> <p>c-Conserving health and diversity of marine ecosystems and allowing and encouraging sustainable uses are two goals that are attainable and provide a firm foundation for planning.</p> <p>d-Recognition and appreciation of the value of preserving the 19 nearshore finfish species in the draft.</p> <p>e-Supports annual reviews of the effectiveness of the plan and the health of the fisheries.</p> <p>f-Commends the Department for incorporating information on non-target species such as seabirds and marine mammals for management based on an ecosystem perspective.</p>	<p>a-The plan seems to prescribe a plan based on limiting human harvest.</p> <p>b-Plan does not present any structure (schedule) to attain goals within an acceptable time frame.</p> <p>c-Plan does not present a clear sense of direction.</p> <p>d-Best available information from science is not sufficient to attain the goals of the plan.</p> <p>e-The plan is threatening freedom to simply go fishing.</p> <p>f-Does not adequately provide for future management when unexpected conditions occur.</p>	<p>a-The Department is an enforcement agency not a management agency; contact the Department of Parks and Recreation to discuss feasibility studies, the delineation of sub-tidal land use, and public interface.</p> <p>b-Recommend two new goals: to protect seabirds and marine mammals from bycatch, injury, and death; and to reduce seabird/fishery interactions around important seabird nesting colonies.</p> <p>c-Important to take a conservative approach until more information is available on the nearshore fish species.</p> <p>d-The word "substantially" should be removed from "peer review members will not have participated substantially in the development of the document to be reviewed."</p> <p>e-No final action on the MLMA should be initiated without an independent peer review and a thorough consideration of unintended consequences.</p> <p>f-Have seen an impact of traps on sea trout (greenlings) and cabezon.</p>

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

	<p>g-The plan uses the same management approach that has created the collapse of many rockfish species.</p> <p>h-Finds distressing the statement "lack of information should not greatly delay taking action."</p> <p>I-Chapter 6: The statement that any MLMA document can be precluded from peer review may provide a loophole.</p> <p>j-A lot of assumptions being made because of lack of data and complexities of the biological systems.</p> <p>k-Insufficient consideration of nearshore ecosystem benefits.</p>
<p>B) HARVEST CONTROL RULE</p>	<p>a-Concern there are no specific mechanisms to tie harvest control and other management measures to ecosystem considerations.</p> <p>b-Concern that the precautionary approach and overfishing threshold are not sufficiently conservative.</p> <p>c-Does not contain specific management prescriptions to reduce the ecological impacts of fishing or to adjust allowable harvest levels to varying ocean productivity conditions.</p> <p>a-April 2001 hearing in Oakland: there was a demand for a moratorium on nearshore commercial fishing that is not incorporated into the alternatives.</p> <p>b-Consider a hiatus on the nearshore commercial live fish fishery until the Department obtains funding for enforcement and management of regulations.</p> <p>c-The management of the nearshore fishery should flow from the principle of public access to our common resources.</p>

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

<p>Alternative 1: No Change</p>	<p>a-Support for no-change alternative.</p> <p>b-Need current measures to be analyzed and studied in order to justify further recommendations.</p> <p>c-The laws are working; have caught more fish this year than in last eight years.</p>	<p>d-Believes the resource is in far greater peril and immediate reductions in take and precautionary priorities to allocation appear warranted for both the commercial and recreation sectors.</p>	<p>d-Statewide closure of the nearshore commercial fisheries: suspend for 3 years; if harvestable surplus in excess of the recreational use then reopen.</p> <p>e-Use approach used for emerging fisheries mandated by the MLMA.</p>
<p>Alternative 2: Nearshore Finfish Conservation Areas</p>		<p>a-Thirty to fifty percent closures is too much and will cause fish in non-closed areas to be wiped out.</p>	<p>a-Close the nearshore waters to commercial fishing for the nearshore species.</p> <p>b-Control of sport fishing size, limits, and seasons will not correct the (current) disastrous situation without greatly limiting or eliminating commercial fishing within the 3-mile coastal area.</p>
<p>Alternative 3: Gear Restrictions and MPAs</p>	<p>a-Commercial fishing should be limited to rod and reel or two lines or rods per person and a two-hook limit.</p> <p>b-Strongly supported (especially) MPAs that include important seabird and marine mammal foraging, breeding, and haul-out areas.</p>	<p>a-If traps are removed effort might shift to hook-and-line fishing (environmental impacts result?)</p> <p>b-Any consideration of maximum sustainable yield (is) seriously flawed. There is insufficient fishery-dependent data to verify the resource capacity.</p>	

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

<p>Alternative 4: MSY/OY with MPAs (Preferred alternative)</p>	<p>a-Establishment of at least 10 percent of habitat in north and central regions and 15 percent in the south region is a good idea.</p> <p>b-The preferred approach seems reasonable and necessary.</p> <p>c-Support for the general intent; the inclusion of MPAs is an important step in fulfilling goal of sustainable fisheries.</p>	<p>a-Caution against using historic catches as a guide to predicting and regulating future catches.</p> <p>b-Goal of socio-economic dimension is not a major consideration in the preferred alternative.</p> <p>c-Preferred alternative fails to adequately address the size and geographic locations of MPAs.</p> <p>d-The UASC gear restriction proposal is not incorporated into the preferred alternative.</p> <p>e-Coast wide optimal yields will not work for nearshore rockfish.</p>	<p>a-Preferred alternative should include more habitat selection for northern California.</p> <p>b-Plan should address how ecosystems considerations and ecosystem knowledge should play a role in shaping and revising the more traditional harvest control rules.</p> <p>c-Should include a restricted access nearshore trap permit above Point Arguello.</p> <p>d-Incorporate components of finfish conservation areas and gear restrictions.</p> <p>e-Add another alternative which incorporates the intent of the preferred alternative with certain aspects of conservation areas, gear restrictions, and modifications to MPAs and bycatch</p>
<p>C) REGIONAL MANAGEMENT</p>	<p>a-Wants management plans based on the specific area to which it concerns.</p> <p>b-Support for regional management.</p> <p>c-Preferred approach of dividing the state into three regions seems to be the most practical.</p>		<p>a-North of Cape Mendocino: bad weather, exposed shoreline, few fishable days, few fishermen, and poor market.</p> <p>b-District 10 should be in northern region.</p>

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

<p>D) ALLOCATION</p>	<p>a-Preferred approach of allocating by region based on historic catches makes sense as long as the catch total used are accurate.</p>	<p>a-Basing allocations on historic catch has some inherent problems; if large numbers of fish were taken, the corresponding allocation would be too much.</p> <p>b-The recreational fishery is not targeting the species of the live-fish fishery, it is a waste of potential commercial income to allocate so much to the recreational fishery when they will never use it.</p>	<p>a-Area allocation makes a lot more sense.</p> <p>b-Allocation should be shifted in favor of the recreational users as the highest and best use of our limited resource.</p>
<p>E) MARINE PROTECTED AREAS</p>	<p>a-Supports no-take marine reserves; they should constitute at least 15-30 percent of the nearshore areas and comprise the majority of the MPAs.</p> <p>b-Sonoma County Regional Parks would like to be involved in any committees involved.</p> <p>c-support for full protected marine reserves instead of simply prohibiting the take of the 19 species.</p>	<p>a-Don't close any more areas as this only increases fishing pressure in the open areas.</p> <p>b-If compelled to have MPAs, think small.</p> <p>c-Socio-economic impacts of MPAs on fish communities will be dire.</p> <p>d-Timelines for MLPA and NFMP should be aligned.</p> <p>e-Use of MPAs could devastate the economic feasibility of the nearshore fishery.</p> <p>f-The value of the goal of socio-economic dimensions should be considered related to the impact of MPAs.</p> <p>g-Reliance on no-take management (can) block alternative solutions.</p>	<p>a-Kelp harvesting should be forbidden in reserves.</p> <p>b-No-take marine reserves must be established and expanded in the Channel Islands.</p> <p>c-Kelp harvesters should be encouraged to establish new kelp forests outside marine reserves.</p> <p>d-Access to reserves and parks must be open without fees to all non-consumptive users.</p> <p>e-Public aquariums should not be considered scientific collecting within no-take areas.</p> <p>f-Party boats should be considered commercial vessels and not allowed in marine parks.</p> <p>g-Crab and salmon fishing should not be restricted in the MPAs.</p>

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

		<p>h-Recommendation of between 30-50% by region should be rule of thumb.</p> <p>I -This will help in a small way but leave the rest of the 3-mile area overfished and underpopulated with breeding stocks.</p> <p>j-The criteria for marine reserves are arbitrary.</p> <p>k-If major closures happen, anglers are likely to sell boats and tackle and</p>	<p>h-Locate a few of the MPAs in areas that have minimal public access and meet the habitat and ecological criteria.</p> <p>I-An MPA is a tool, only as good as those who use it.</p> <p>j-Modifications and additions are needed to the proposed MPAs to better protect seabird colonies and other important marine resources.</p>
<p>F) RESTRICTED ACCESS</p>	<p>a-Overall fishing effort should be reduced to avoid relocating fishing pressure to unprotected areas.</p> <p>b-Recommend individual fishing quota systems to reduce and control capacity.</p>	<p>a-Fails to understand the logic of denying permits to present permit holders that have the smallest impact while favoring permit holders that harvest the most.</p> <p>b-Doubts the proposed methods will affect remaining fish stocks.</p> <p>c-Not a top producer and will be put out of business.</p> <p>d-Concerned about potential delay in implementation of restricted access and capacity control policies.</p>	<p>a-The 1994-2000 window period should be extended to include 20 years.</p> <p>b-Why not allow anyone who is already in a fishery to still be in the fishery?</p> <p>c-If someone wants more fish, he can buy someone else's permit.</p> <p>d-Consider special situations for people who did not qualify for the nearshore permit.</p> <p>e-Individual fishing shares should be divided equally between all nearshore permit holders.</p>

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

<p>G) SOCIAL AND ECONOMIC CHARACTERISTICS OF THE FISHERY</p>	<p>a-Proposed draft could have a significant socio-economic impact on the Sonoma County Regional Park facilities that provide access and services: specifically, reducing number of boats berthed at the marina would impact ability to continue its operation.</p> <p>b-Social economic characteristics of the fishery portion of the plan leaves out the significant value of tourism.</p> <p>c-Not enough study has been done on financial impact of all-day sport fishing boats, and the restaurants and fishing tackle shops.</p> <p>d-There is no mention about ecological services benefits of the nearshore ecosystem</p>	<p>a-Non-extractive and ecological services values should be quantified and recognized.</p>
<p>H) RESEARCH PROTOCOLS</p>	<p>a-There is no detailed consideration given to the employment of commercial fishing within the management process.</p> <p>b-Chapter 9 does not detail the acquisition, processing and presentation of essential fishery information to attain the goals.</p> <p>c-Long studies will oversee the depletion of the resource to a collapse.</p> <p>d-Not enough policy context for the essential fishery information section.</p>	<p>a-Plan should include specific steps for training of staff who conduct dockside species assessments and steps to reduce staff turnover.</p> <p>b-Need a tagging system to see where these fish are going, their growth, and when they lay eggs.</p> <p>c-The marine area has to be mapped: bottom types, ecosystem types, water condition and movement, and a tabulated list of marine life.</p> <p>d-The community for each ecosystem has to be "normalized" to create a reference that signifies D19stability to detect cycles and trends.</p>

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

		e-How can the health and diversity of ecosystems be diagnosed and treated?
I) IMPLEMENTATION REQUIREMENTS AND COSTS	a-The Department lacks the resources to implement this plan.	<p>a-Essential the Department budgets funding towards dockside enforcement.</p> <p>b-Essential the Department budgets funding towards education and outreach.</p> <p>c-Where is the money coming from to estimate the numbers, manage the fishery and enforce the rules.</p> <p>d-The cost of the initial commercial fishery-independent assessment and the required follow-up should be borne by the commercial fishery interests that would profit from the harvest.</p> <p>e-The principle that costs should be borne by the commercial fishery interests should be added.</p>
J) FUTURE MANAGEMENT CONSIDERATIONS--PFMC transfer	a- Put fish under one jurisdiction.	a-Strictly enforced commercial harvest and recreational bag limits
K) OTHER ISSUES	<p>a-Prepared to accept the fact that too many fish are being removed (by recreational as well as commercial fishermen).</p> <p>a-Does not think the small amount of commercial fish taken by individual has any impact on the resource.</p> <p>b-Concerned that nothing has been mentioned about controls that should be placed on the degradation of habitat .</p>	<p>a-Regulations: size limits should be same for sport and commercial.</p> <p>b-Better if all fish caught are kept because of mortality if released.</p>

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

	<p>c-No mention of impact by municipal discharges.</p> <p>d-Serious consideration needs to be given to stricter regulations governing kelp harvesting.</p>	<p>c-Regulations: Bag limit of ten rockfish is too much because most people can only catch six or seven fish.</p> <p>c-Restrict longliners and trawlers: kill undersized fish and have bycatch.</p> <p>d-Bottom trawlers and gill nets should be outlawed in state waters.</p> <p>e-Use quotas and closures to save the nearshore fishery.</p> <p>f-Four month commercial season, October-January would work.</p> <p>g-Traps used for cabezon above Point Arguello should have 5" ring.</p> <p>h-Limiting commercial to three days is a little tough because of weather, how about adding a day.</p> <p>I-Request that sport fishermen be allowed year round shallow-water rock cod fishing within one mile of shore and in 100 ft or less.</p>
<p>L) COMMUNICATION</p>	<p>a-Request an extension of six months for comment.</p> <p>b-No specific evidence was presented at the Sebastopol meeting as to what caused all these nearshore fisheries to disappear</p> <p>c-If last comments were to be received by September 26, holding a hearing in Eureka on September 29 was illegal.</p>	<p>a-Suggests a strong consulting and implementation relationship with the public.</p>

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

<p>M) Environmental Impacts</p>	<p>a-the draft adequately identifies and explains fishery/seabird interactions but underestimates the impacts of these interactions.</p>	<p>a-Is there an impact by municipal discharges</p> <p>b-Santa Monica Bay has been closed to commercial fishing for over 50 years (because of pollutants), why hasn't fish populations increased there?</p> <p>c-Until all other problems are taken into account, the fisheries should not be closed.</p> <p>d-Environmental laws can derail common sense.</p> <p>e-Impacts of fisheries on seabirds is underestimated regarding hook-and-line gear interactions.</p> <p>f-Incidental take of sea otters in live fish traps and other marine turtles, birds, and mammals in hook-and-line practices need to be better addressed.</p> <p>g-Alternative 1: potential impacts on marine turtle populations, marine birds, and southern sea otters should be taken in consideration and analyzed.</p> <p>h-Chapter 8: strongly disagrees with conclusion of solely considering direct effects on seabirds because of the lack of data on indirect effects.</p>	<p>a-Would be more accurate to state that under Alternative 1, localized but significant impacts may occur to certain seabird colonies.</p> <p>b-The protection of seabird food resources needs to be more fully addressed and strengthened.</p> <p>c-Relevant data to determine prey species of seabird populations exists and should be used.</p> <p>d-Chapter 8: pigeon guillemots should be added as a seabird species considered in detail.</p> <p>e-Chapter 8: Loss of habitat on the Farallon Islands for storm petrels should be explained.</p> <p>f-Chapter 8: terns, skimmers, and gulls should be discussed in more detail.</p> <p>g-Chapter 8: Juvenile rockfish are important in diets of rhinoceros auklets and common murre and there are implications for potential impacts to seabirds from competition from fisheries.</p> <p>f-Department should review the U.S. Senators and Representatives May Briefing on water quality issues.</p>
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Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

	<p>I-Impacts on fish stocks by sea lion depredation and pollution have not been addressed.</p>	<p>g-Discuss the decision to eliminate the set gillnet fishery in less than 60 fm between Point Reyes and Point Arguello due to impacts on marine birds and mammals.</p> <p>h-Chapter 2.4.2.5: Add a section to prohibit extractive uses that result in the bycatch of the 19 nearshore species.</p> <p>I-Seabird prey consumption rates need to be modeled and included in the plan.</p>
<p>N) MLPA</p>	<p>a-If anchorage at the Farallon Islands is closed, serious problems would occur for salmon fishermen.</p> <p>b-Reports of fishermen disturbing wildlife are false.</p> <p>c-Opposed to closing all fishing from Big Flat Creek to Telegraph Creek and from Punta Gorda lighthouse to north of the Mattole River.</p> <p>d-The areas that are being mapped out as reserves are all the good fishing areas and closing these areas will essentially eliminate coastal sport fishing.</p> <p>e-Opposed to any closures: cannot catch enough fish with rod and reel to hurt any fishery.</p> <p>f-Shocked to learn of the proposed closure of La Jolla Canyon, Camp Pendleton and much of Point Loma.</p>	<p>a-Hopkins Marine Reserve should extend to the tip of the breakwater.</p> <p>b-Hopkins Marine Reserve should be named the Ed Ricketts Reserve.</p> <p>c-The Point Lobos State Marine Reserve should be extended eastward to include the Mono Lobo wall and south Monastery Beach and northeastward to Stewarts Point.</p> <p>d-Anchorage in sandy bottom, away from rocky bottoms, don't hurt anything.</p> <p>e-Need to include knowledgeable fishing industry people on the MLPA planning team.</p> <p>f-Timelines for MLPA and NFMP should be aligned so the outcomes and results of these plans can be compared and comments coordinated.</p>

Table A1-2. Overview of Public Comments on the Draft Nearshore Fishery Management Plan. Written Comments from Letters and Faxes (Fax Comments in Bold)*

<p>Regulations</p>	<p>g-The incorporation of the MLPA reserve element could be viewed as a band-aid to bolster a continuation of the practices which have led...to the deplorable state of the resource.</p>	<p>g-Extend MPAs around the south Farallon Islands to include the North Farallon Island.</p> <p>h-MPAs with significant surface nesting seabirds should be State Marine Reserves.</p> <p>I-comment on La Jolla reserve study.</p> <p>a-Sea trout (greenlings) size limit should be 14".</p>
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*A total of 18 FAXes were received; 14 of those were duplicates of letters received

Table A-3. Overview of Public Comments on the Draft Nearshore Fishery Management Plan

COMMENTS FROM PUBLIC HEARINGS IN SAN LUIS OBISPO, SEASIDE, OAKLAND, EUREKA, LOS ANGELES, AND SAN DIEGO			
FMP ELEMENT	FAVORABLE	UNFAVORABLE	OTHER
A) BACKGROUND	<p>a-Likes emphasis on sustainability.</p> <p>b-Supports goals of stability and sustainability.</p>	<p>a-FMP does not address all sources of mortality including predation by marine mammals.</p> <p>b-Data show that the problems in the fishery are worse than the FMP acknowledges.</p> <p>c-Data did not support restrictions on lingcod.</p> <p>d-CPFV data should not be used to set limits for divers.</p> <p>e-Until recently, kelp greenling were lumped with other high dollar fish, giving misleading impression that kelp greenling are declining.</p>	<p>a-Divers have seen dramatic declines in fish.</p> <p>b-Commercial fishing in some areas still successful, after decline due to incursion of Asian longline fishermen in mid-1990s.</p> <p>c-Far fewer commercial nearshore fishermen now; FMP addressing problems of the mid-1990s.</p> <p>d-Wants the Department to define how non-extractive, intrinsic values will be quantified and recognized.</p>
B) HARVEST CONTROL RULE			
Alternative 1: No Change	a-Should allow interim regulations to work and be evaluated.		
Alternative 2: Nearshore Finfish Conservation Areas			<p>a-Proposal: Ban commercial fishing within three miles of shore, possibly until harvestable surplus proved. (Petition submitted with 5,000 signatures); close nearshore reefs to commercial fishing.</p> <p>b-If commercial fishing not banned within 3 miles, then restrict to same gear as recreational fishers.</p> <p>c-Divers should be banned from same areas as other fishers.</p>

Table A-3. Overview of Public Comments on the Draft Nearshore Fishery Management Plan

<p>Alternative 3: Gear Restrictions and MPAs</p>	<p>a-United Anglers proposal reduces effort and reduces risk of serial geographic depletion.</p>	<p>a-Opposition to gear restriction in FMP.</p>	<p>d-Petition submitted with 190 signatures for seafood consumers to have continued access to fresh, local, hook-and-line caught rockfish.</p>
	<p>b-United Anglers proposal allows recreational fishers to compete successfully with commercial fishers.</p>	<p>b-Opposed to fish limitation on commercial fishermen (to same limit as recreational fishermen). OPPOSED TO IMPOSING THE SAME LIMIT ON COMMERCIAL FISHERMEN AS ON RECREATIONAL FISHERMEN.</p>	<p>b-Proposal for study of bycatch in traps since 1993 study.</p>
	<p>c-United Anglers proposal offers lower cost for enforcement and reduces conflict amongst users.</p>		<p>c-Proposal for ban on stick gear since it hastens geographic depletion.</p>
	<p>d-Gear restrictions should be a part of any limited entry program.</p>		<p>d-There is no bycatch in spearfishing.</p>
			<p>e-Proposal for barbless hooks.</p>
			<p>f-Proposal that all fish caught, regardless of gear type, be retained and counted against quota limits.</p>
			<p>g-Proposal that marine take be governed by same types of regulations used in freshwater (includes catch and release).</p>
<p>Alternative 4: MSY/OY with MPAs (Preferred alternative)</p>	<p>a-Support for intent of preferred alternative, but need alternative for proxy for MSY.</p>	<p>a-Does not address serial depletion and geographic depletion. Managing rockfish as a group risks weak stocks.</p>	<p>a-Proposal: Ban commercial fishing for several years until it can be demonstrated to be sustainable. Supported by 100 divers in past.</p>
		<p>b-There is inadequate information to manage the fishery with MSY. Landings data and proxies are inadequate.</p>	<p>b-Proposal to set OY at 30% of MSY proxy. If not, moratorium on commercial and recreational fishing until commercial prove a harvestable surplus. If not proved, then only recreational after two years.</p>

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	<p>c-Should be responsive to ocean events, e.g. El Nino: create an ocean productivity index as an alternative to MSY.</p> <p>d-OY level should be more conservative than 50% of MSY.</p> <p>e-MSY calculation flawed because based on landings from a period of decline, contrary to Restrepo et al. If proxy is used, then should be no higher than lowest catch in the period.</p> <p>f-MSY works only for fish that are mobile, but nearshore fish are largely sedentary.</p> <p>g-MSY does not reflect non-extractive values of the nearshore.</p> <p>h-If MPAs are established, the OY should be set at 90% not 50% of MSY.</p> <p>i-FMP does not articulate the reasons that MSY/OY was chosen as the preferred harvest control rule.</p> <p>m-MSY does not address impacts on associated species.</p> <p>n-MLMA does not require use of MSY and MSY has failed in many fisheries.</p> <p>o-MSY and the use of proxies, as in Restrepo, is inconsistent with MLMA mandate to manage for healthy ecosystems.</p>	<p>c-FMP should include explicit guidance on moving away from MSY as additional essential fishery information is gathered.</p> <p>d-Would need a separate OY for each reef to prevent local depletion of reefs. IN ORDER TO PREVENT LOCATION DEPLETION, EACH REEF SHOULD HAVE ITS OWN OY.</p> <p>e-Concerned about possible transfer of effort from the nearshore fishery into other fisheries (suggests managing all fisheries as one unit).</p>
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<p>C) REGIONAL MANAGEMENT</p>	<p>a-Supports, but regional management must be consistent with statewide policy.</p> <p>b-General support for regional management. Suggestions include: three regions; four regions with break at Ano Nuevo; boundary for southern region should be at Pt. Arguello; Shelter Cove should be in northern region.</p> <p>c-Supports but FMP should clearly state the method for selecting members of regional committees.</p>	<p>a-Regional committees may be dominated by those with financial stake.</p> <p>b-Fishermen in the north feel underrepresented now.</p> <p>c-Concerned with how members would be selected.</p>	<p>a-The Central Region should be split into two regions at Ano Nuevo since it is too large.</p> <p>b-Commission should manage all fisheries in state waters, without the PFMC.</p> <p>c-Fishing permits should be regional.</p>
<p>D) ALLOCATION</p>	<p>a-Supports continuation of status quo set by interim management measures (no change approach).</p> <p>b-Supports allocation to both recreational and commercial.</p> <p>c-Stated the vote taken at the Advisory Committee was for the preferred approach.</p>	<p>a-Should be based on criteria, e.g., legal requirements, access, significance to the sector, economic contribution, and fishery history.</p> <p>b-Data used in interim allocation was inaccurate.</p> <p>c-Divers are not protected from CPFVs which take far more.</p>	<p>a-Recent reallocation of greenings to commercial was unfair; lack of recreational catches may reflect lack of fish.</p> <p>b-PFMC unfairly allocated rockfish to trawlers hurting small fishermen.</p> <p>c-Preference should go to commercial fishermen in the northern region.</p> <p>d-Preference should go to recreational fishery; excess to commercial. MOVE THIS TO SUPPORT OF OPPOSE?</p>
<p>E) MARINE PROTECTED AREAS</p>	<p>a- MPAs will help in protecting habitat and ecological communities, as required by the MLMA.</p> <p>b-MPAs will serve as insurance against environmental change and mistakes in management.</p> <p>c-MPAs can help in developing information for adaptive management.</p> <p>d-MPAs will serve as refuge areas for remaining fish.</p>	<p>a-California already has plenty of MPAs and their effectiveness has not be shown.</p> <p>b-No take zones do not address other threats such as oil spills.</p> <p>c-MPAs will hurt recreational fishing particularly in southern California.</p> <p>d-MPAs not proven to enhance fish outside reserves.</p>	<p>a-Proposal for area from shoreline to 1/4 mile closed to all fishing except diving and shoreline fishing.</p> <p>b-MPAs need to be linked to restricted access.</p> <p>c-Bycatch of any of the 19 nearshore species should be banned in MPAs.</p> <p>d-MPAs should be away from population centers to avoid impact on people.</p>

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e-Without MPAs, lack of information on stocks will force greater restrictions.	e-Divers want access without time or area closures.	e-Use rigs to reefs as an offset to closures.
f-10-15% coverage by MPAs OK now, but should grow to 20-30% by 2007.	f-MPAs will hurt people least able to absorb it.	f-Preference for restricted access and gear restrictions over area closures.
g-Reserves can enhance fisheries outside.	g-MPAs should be no take, not conservation areas.	g-MPAs must conserve the health and diversity of marine life and recognize the support of esthetic, educational, scientific, and recreational uses.
h-The FMP should include a specific percentage of coverage by MPAs.	h-In Sonoma, proposed MPAs are mostly at the few public access points, affecting recreational fishermen especially.	h-Proposal: Phase in MPAs until 20% of nearshore habitat covered.
i-MPAs should be placed near river mouths.	i-MPAs are redundant to quota cuts, and should be small if adopted.	i-Extractive uses should be prohibited in MPAs and non-extractive uses should be regulated to protect habitat.
j-MPAs promote sustainability.	j-MPAs should be used only after completion of the MLPA process.	m-MPAs should be large enough to protect the home range of species being protected.
	k-MPAs will constrict fishermen into smaller area fostering depletion.	n-MPAs are difficult to monitor, DETERMINING EFFECTIVENESS ISN'T CLEAR, and how do you determine that a given reserve has achieved effectiveness. [MOVE TO UNFAVORABLE COLUMN?]
	i-MPAs in northern California should be limited to 5% of the area since much of the area already protected by weather and inaccessibility.	o-Suggests hard-bottom areas around Smith River, Klamath River, and Redwood Creek be proposed as MPAs.
	m-The Department cannot enforce MPAs.	p-Close areas to all.
	n-Quota reduction of 50% together with closure of 10% of area for MPAs will cause extreme impact.	
	o-FMP relies too much on MPAs and MLPA process.	

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		<p>p-Unclear how percentages of area for MPAs were determined.</p> <p>q-FMP should include clear explanation how MPAs meet fishery management and socioeconomic goals.</p> <p>r-Percentages of MPAs in FMP insufficient and inconsistent with science. Minimum percentage is 20%.</p> <p>s-FMP does not have to rely on MLPA for MPAs; sufficient authority in MPA, which should be used if MLPA falls short.</p> <p>t-MPAs as proposed are all near ports which would be disastrous to small communities.</p> <p>u-Opposed to any MPA around Shelter Cove, Eureka, Crescent City, and Trinidad.</p> <p>v-Opposed. Questions if State will train fishermen put out of work.</p> <p>w-Concern over criteria used to place MPAs.</p> <p>x-Cowcod Conservation Areas in So. Calif. are enough.</p> <p>y-Petition with 826 signatures against any MPAs within 10 miles of Shelter Cove, Eureka, Crescent City, and Trinidad.</p>	
<p>F) RESTRICTED ACCESS</p>	<p>a-ITQs will provide incentives for not competing and for stewardship.</p> <p>b-Support for limits on number of participants and transition to ITQs.</p>	<p>a-FMP does not address effort shifts to other fisheries, such as halibut in SF. Should reduce overall fishing effort statewide.</p> <p>b-No need to restrict number of CPFVs.</p>	<p>a-United Anglers gear proposal could reduce effort while restricted access program is being developed.</p> <p>b-Should begin with minimum landing requirement in April 2002.</p>

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	<p>c-Need to empower the people to do the right thing: ITQs such as in New Zealand.</p> <p>d-Supports for recreational stamp but wants funds to go to recreational sampling.</p> <p>e-Agrees, need to control the effort; anyone can walk in and buy a license.</p> <p>f-Supports if done regionally.</p> <p>g-Needs to also include gear restrictions.</p>	<p>c-Number of commercial fishermen has already declined or the numbers are not increasing.</p>	<p>c-Restricted access should consider catch history; specifies catch histories prior to 1994.</p> <p>d-Holders of Federal A permits should be grandfathered into the fishery.</p> <p>e-Fishers need to be able to move among fisheries; so, licenses should be restricted but permitted fishermen should be able to move among fisheries.</p> <p>f-Control date of 1999 should be enforced.</p> <p>g-The restricted access program should be timed with the MLPA process in mind.</p> <p>h-The conservation community should be consulted in the development of any restricted access program.</p> <p>i-The FMP should discuss how the economic benefits of non-extractive uses will be evaluated.</p>
<p>G) SOCIAL AND ECONOMIC CHARACTERISTICS OF THE FISHERY</p>		<p>a-The social and economic impacts of the management alternatives are not assessed in the FMP.</p> <p>b-Opposed to more regulations because of economic downturn in north coast area because of salmon restrictions.</p> <p>c-Concerned with social and economic uncertainty that might result if decisions are made on theory.</p>	<p>a-Continued commercial fishing risks far more valuable recreational fishing.</p> <p>b-Need to look at how the FMP will affect the entire community.</p> <p>c-Concerned about social/economic impact there will be on the recreational anglers to buy licenses.</p>
<p>H) RESEARCH PROTOCOLS</p>	<p>a-Support for recreational fishing stamp to improve information on this sector.</p>	<p>a-Importance of nearshore species movements is understated.</p>	<p>a-Divers will volunteer to assist in science, as in the Great American Fish Count.</p>

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<p>b-The FMP properly prioritizes essential fishery information for a move to ecosystem management.</p> <p>c-Department should collaborate with recreational divers, fishermen and public aquariums and incorporate their knowledge in data analysis.</p> <p>d-The Department should use its recreational fishermen database to target information.</p>		<p>b-Proposal for Department web-based logbook for recreational fishers.</p> <p>c-Proposal for nearshore recreational stamp to monitor recreational fishery.</p> <p>d-Proposal that commercial sampling information be published locally.</p> <p>e-Opposition to punch cards for recreational fishing in northern region; should use existing salmon counters.</p> <p>f-Fishers should be involved in research from the design through execution.</p> <p>g-Need mechanism to detect changes, e.g. those caused by El Nino, rather than rely on landing statistics.</p> <p>h-Federal Groundfish Disaster Relief funds should be used to hire fishermen to conduct research.</p> <p>i-Essential fishery information research should include food webs and interactions among species.</p>
<p>I) IMPLEMENTATION REQUIREMENTS AND COSTS</p>	<p>a-Insufficient funding to enforce regulations, therefore, a subsidy to the commercial fishery.</p> <p>b-Enforcement costs are too substantial.</p>	<p>a-Funding in the past mostly recreational. Commercial not paying management costs.</p> <p>b-The Commission should urge the Legislature to provide funding for future FMPs.</p> <p>c-Report needs to spend more time considering funding.</p> <p>d-Seek money from State for continued research.</p>

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			<p>e-Critical need for essential fisheries information; search for alternative sources of funding.</p> <p>f-The FMP should describe how enforcement of MPAs will be financed.</p> <p>g-The FMP should identify source of funds for implementation of the research protocols.</p>
<p>J) FUTURE MANAGEMENT CONSIDERATIONS--PFMC transfer of authority</p>	<p>a-Supports transfer of authority so decisions can be made at local level.</p>	<p>a-Opposes transfer of authority and recommends that the state manage only three of the 19 nearshore species.</p>	
<p>K) OTHER ISSUES</p>		<p>a-Too little time for comment; therefore, the process should be extended 2-6 months.</p> <p>b-FMP is vague and difficult to understand.</p> <p>c-Inadequate notice of hearings.</p> <p>d-Regulations already are too complex.</p> <p>e-Intrinsic values of nearshore should be explicitly recognized.</p> <p>f-Diversity of California's population not represented at the meetings.</p>	<p>a-State should promote hatcheries for nearshore fish and other fish to meet demand of growing human population.</p> <p>b-Proposal for slot limits.</p> <p>c-The FMP should include explicit guidance on restoring nearshore habitat.</p> <p>d-The FMP should address pollution impacts on nearshore habitat, as from non-point source pollution and sedimentation.</p> <p>e-The FMP should include guidance on range of interests, time commitment, and other aspects of an FMP implementation advisory committee.</p>
<p>L) COMMUNICATION</p>		<p>a-Department needs to use the newspaper and news media more in communicating meeting time and locations.</p>	<p>a-Request for more easily understood information in terms of impacts to people that will result from decisions.</p>

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	<p>b-Delay adoption of the FMP so public has time to review and provide comment.</p> <p>c-Terms not well-defined in FMP (e.g. CPUE, overexploitation, sustainable, socioeconomic dimensions).</p> <p>d-Web site should be updated more often.</p> <p>e-Concerned with difficulty in understanding regulations and interpretations.</p> <p>f-Feels constituent involvement may have overlooked the interests of recreational fishermen.</p> <p>g-Concerned about the process and difficulties in getting the address for the Commission.</p>	<p>b-Would like to see commercial sampling information produced and published at a local level.</p> <p>c-Someone should check with harbor masters about status of the hard copies of the FMP.</p>
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