



# CITY OF CRESCENT CITY

Mayor Isaiah Wright  
Council Member Raymond Altman  
Council Member Kelly Schellong

Mayor Pro Tem Blake Inscore  
Council Member Jason Greenough

**AGENDA**  
**SPECIAL MEETING OF THE**  
**CITY COUNCIL OF THE CITY OF CRESCENT CITY**  
WASTEWATER TREATMENT FACILITY  
210 BATTERY STREET  
CRESCENT CITY, CA 95531

**MONDAY**

**OCTOBER 9, 2023**

**6:00 P.M.**

**This meeting will be held in person at the location listed above.** The City will provide alternative methods of participation for the convenience of the public. The City does not, however, guarantee that there will not be technological issues or interruptions. The public is hereby notified that if there is a technological issue with Zoom or YouTube, the meeting will continue in person as scheduled. The public may access and participate in the public meeting using one or more of the following methods:

- 1) The meeting will be streamed via Zoom (details below). The direct Zoom link will also be posted on the City of Crescent City website ([www.crescentcity.org](http://www.crescentcity.org)). During the meeting, public comment may be made by using the raise hand feature on Zoom;

**ZOOM PHONE NUMBER: 1 (253) 215-8782    ZOOM WEBINAR ID: 840 6412 3904**  
**MUTE / UNMUTE PRESS \*6                      RAISE HAND PRESS \*9**

- 2) The meeting will also be streamed on YouTube (channel: City of Crescent City, California), public comment may be made by calling in to the meeting using the Zoom phone number;
- 3) Public comments may also be made in advance by submitting written comment via [publiccomment@crescentcity.org](mailto:publiccomment@crescentcity.org) or by filing it with the City Clerk at 377 J Street, Crescent City, California, 95531. All public comments (via email or mail) must be received by the City Clerk prior to 12:00 p.m. the day of the meeting. Please identify the meeting date and agenda item to which your comment pertains in the subject line. Public comments so received will be forwarded to the City Council and posted on the website next to the agenda. **Written public comments will not be read aloud during the meeting.**

*Notice regarding Americans with Disabilities Act:* In compliance with the Americans with Disabilities Act, if you need special assistance to participate in the meeting, please contact the City Clerk's office at (707)464-7483, ext. 223. Notification 48 hours before the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting [28 CFR 35.102-35.104 ADA Title II]. For TTYDD use for speech and hearing impaired, please dial 711. A full agenda packet may be reviewed at City Hall, 377 J Street, Crescent City, CA or on our website: [www.crescentcity.org](http://www.crescentcity.org)

## **OPEN SESSION**

**Call to order**  
**Roll call**  
**Pledge of Allegiance**

## **NEW BUSINESS**

### **1. Letter in Opposition to the Nearshore Groundfish Closure**

- *Recommendation: Hear staff report*
- *Technical questions from the Council*
- *Receive public comment*
- *Further Council discussion*
- *Authorize the Mayor to sign a letter in opposition to the Nearshore Groundfish Closure*

## **ADJOURNMENT**

Adjourn to the regular meeting of the City Council of the City of Crescent City on Monday, October 16, 2023, at 5:30 p.m. at the Flynn Center, 981 H Street, Crescent City, CA 95531.

### **POSTED:**

October 5, 2023

/s/ Robin Altman

City Clerk/Administrative Analyst

#### ***Vision:***

The City of Crescent City will continue to stand the test of time and promote quality of life and community pride for our residents, businesses and visitors through leadership, diversity, and teamwork.

#### ***Mission:***

The purpose of our city is to promote a high quality of life, leadership and services to the residents, businesses, and visitors we serve. The City is dedicated to providing the most efficient, innovative and economically sound municipal services building on our diverse history, culture and unique natural resources.

#### ***Values:***

Accountability  
Honesty & Integrity  
Excellent Customer Service  
Effective & Active Communication  
Teamwork  
Fiscally Responsible



**City of Crescent City**  
*Where the Redwoods Meet the Sea*

377 J Street, Crescent City, CA 95531 • 707.464.7483 • Fax 707.465.4405 • [www.crescentcity.org](http://www.crescentcity.org)



October 9, 2023

*Submitted via public comment e-portal*

Pacific Fishery Management Council (PFMC)  
7700 NE Ambassador Pl. #101  
Portland, OR 97220

RE: Opposition to Nearshore Groundfish Closure for 2024 Season

Dear Council,

The California Department of Fish and Wildlife (CDFW) issued an emergency closure of the 50 fathom Rockfish Conservation Area as of August 21, 2023 to protect the quillback rockfish. The City Council recently heard from local fishermen who urged the Council to oppose the Nearshore Groundfish Closure. The concerns that local fishermen expressed were that (1) the method in which this closure was determined to be necessary is not necessarily accurate and (2) the complete closure of the Northern Groundfish Management Area up to 50 fathoms is overbroad.

The data relied upon to justify the emergency closure was obtained from trawling methods to estimate stock numbers when the trawling data for our area is limited since the nearshore waters cannot be trawled due to the nature of the reefs. Since, the ecological data indicates that quillback rockfish are rarely found in waters shallower than 10 fathoms, the complete closure of up to 50 fathoms is overly broad and thus overly burdensome to the local fishing and related industries.

A similar closure of the Northern Groundfish Management Area in 2024 would be economically devastating for some of our local businesses and the ripple effect would be felt throughout the entire community, which is economically dependent upon fishing and tourism (charter boats, fishing supply stores, restaurants, hotels, RV Parks, vacation rentals, local hotel taxes, local sales taxes, harbor revenues, etc.).

In addition, the closure forces local fisherman to go beyond the 50-fathom boundary which places them in precarious and dangerous waters. Most of our sport fishermen have smaller boats that are not designed to handle the conditions this far offshore. Thus, fishing past the 50-fathom boundary is not a realistic or safe alternative for local sport fisherman.

Due to the importance of Del Norte County's nearshore ocean fishing industry and ancillary services to the local economy at all levels, the City Council staunchly opposes a similar 2024 closure without further scientific study utilizing the best data retrieval methods available and tailoring the closure so as to not be overbroad and overburdensome to our local economy.

On behalf of the entire City Council,

Mayor Isaiah Wright  
City of Crescent City



County of Del Norte  
Board of Supervisors  
981 "H" Street, Ste. 200  
Crescent City, California 95531

Phone  
(707) 464-7204

Fax  
(707) 464-1165

September 6, 2023

Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

*Written Comments Submitted with Oral Testimony from Supervisor Chris Howard*

**Re: September 2023 Council Meeting, Harvest Specifications Technical Corrections and In-Season Adjustments (Agenda Item G8)**

To Whom It May Concern:

As you are likely aware, the California Department of Fish and Wildlife (CDFW), under emergency closure authority granted by the California Fish and Game Commission, closed the 50 fathom Rockfish Conservation Area in order to protect a single species, the quillback rockfish, within Northern Groundfish Management Area (from Cape Mendocino north to the California/Oregon border). This closure became effective August 21, 2023. These comments are being provided in order to constructively address an underlying issue we believe that exists with how this decision was made as it is our strongly held view, based on information provided to this Board by local fisherman with knowledge of local reef structures and stock survey methods, that the underlying data collected prior to this closure was not complete and lacking in many regards. Our hope with these comments is to assist in avoiding unintentional socioeconomic damages to communities such as ours caused by poorly informed policy decisions, through recommendations for improved scientific methods and data collection.

As noted, it is our view that the data used to inform these policies contains significant gaps. Specifically, the data relies on trawling methods to estimate stock numbers despite trawling data for our region being either limited or non-existent due to the fact much of our nearshore waters cannot be trawled due to the nature of our reefs. As such, we are requesting that the PFMC request CDFW to conduct "Hook and Line Surveys", which will better target the nearshore fishery, rather than rely on incomplete trawling-derived data. We believe this is the only way to get the data needed to accurately estimate our nearshore stocks and allow for robust recommendations to the PFMC and to, ultimately, eliminate the perpetual cycle which CDFW has placed us in for more than just the quillback. In addition, as an interim measure, we would recommend a zero bag limit for the quillback rockfish, as well as potentially the China rockfish, which stocks are thought by many to be in the same state as the quillback.

It is our fear that the quillback is only one of a number of nearshore reef species which in the coming years will likely have in season curtailments or zero bag limits based on data being collected and reported by the Fisheries Science Center. We believe this will lead to a perpetual cycle of emergency closure(s) due to poor

data collection around the 30+ groundfish species on our nearshore reefs, which presents a significant emergency for our community as the impacts to our tourism based communities and commercial fleet are real and have been compounded by the preceding recreation and commercial salmon season closure.

Thank you for the opportunity to provide these comments. We look forward to being involved in future conversations for how best to move these issues forward in the best informed manner possible.

Respectfully,



Darrin Short  
Chairman

CC: Honorable Mike McGuire, Member of California State Senate  
Honorable Jim Wood, Member of California State Assembly  
Charlton Bonham, Director, California Department of Fish and Wildlife  
Todd Phillips, Groundfish staff, Pacific Fishery Management Council

WES WHITE  
President

HARRY ADAMS  
Secretary

GERHARD WEBER  
Commissioner

RICK SHEPHERD  
Commissioner

BRIAN STONE  
Commissioner

## Crescent City Harbor District

Phone (707) 464-6174 Fax (707) 465-3535  
101 Citizen's Dock Road  
Crescent City, California 95531  
www.ccharbor.com



TIM PETRICK  
CEO/Harbormaster

August 21, 2023

Hon. Mike McGuire  
Majority Leader  
California State Senate  
Eureka Office  
1036 5<sup>th</sup> St., Suite D  
Eureka, CA 95501

Subject: Urgent Objection to CDFW Regulatory Changes Affecting Nearshore Groundfish  
in the Northern Management Area

Dear Senator:

As Commissioners serving on the Crescent City Harbor District Board of Harbor Commissioners, we are writing to express our strongest objections and deep concerns regarding the recent regulatory changes implemented by the California Department of Fish and Wildlife (CDFW) relating to quillback rockfish in the Northern Groundfish Management Area (GMA). The CDFW has placed onerous restrictions on recreational boat-based fishing of most species of groundfish. Within the GMA, only areas seaward of a 50-fathom boundary line remain open (effective 12:01 a.m., Monday, August 21, 2023). We believe this regulatory change will have serious negative repercussions on our local economy across a broad range of individuals and businesses.

As explained more fully below, **we are calling for CDFW to rescind these regulations for a period of 60-days, or in the alternative, to adjust the conservation area boundary line to permit fishing up to 10 fathoms.** While we recognize the importance of conservation and the need to protect quillback rockfish, the sudden imposition of the "offshore only" fishery in the Northern GMA has sent shockwaves through our local economy, leading to serious concerns about the viability of several industries that depend on this fishery either directly or indirectly.

### **The Conservation Boundary Should Be Modified**

CDFW established a Rockfish Conservation Area (RCA) with a current boundary of 50 fathoms. We propose a modification to start the RCA offshore at a 10-fathom depth. This adjustment is based on ecological data indicating that quillback rockfish, the species of concern to CDFW, are rarely found in waters shallower than 10-fathoms. Such an adjustment would align with the CDFW's conservation goals while addressing critical concerns within our sportfishing community.

Forcing our sportfishermen to venture beyond the 50-fathom boundary places them in precarious and dangerous waters. A significant number of our local sportfishermen operate smaller boats, which are not designed or equipped to handle the conditions so far offshore. This situation becomes all the more dire when considering the recent decommissioning of the local Coast Guard station. Without this vital resource, the potential response time in emergencies has increased dramatically, exacerbating the risk factor for our fishermen.

The ripple effects of these regulatory changes are twofold. On the one hand, many sportfishermen may altogether abstain from fishing due to the dangers of fishing far offshore, thereby drastically reducing the economic inflow into our region. On the other hand, those who choose to brave the risks and venture out will be placing their lives in considerable jeopardy. Neither scenario is acceptable.

### **Economic Domino Effect**

The sportfishing industry is not simply a recreational pastime but an essential part of our local economy, generating revenue, creating jobs, and supporting countless ancillary businesses. An economic domino effect is already cascading to other businesses, such as hotels and Airbnbs, which were booked by fishing enthusiasts and their families months in advance, and which now face a surge in cancellations. Furthermore, local restaurants now stand to lose the patronage of sportfishing tourists who will be staying home. Meanwhile, local tourist attractions that rely on the influx of visitors drawn initially by our renowned fishing opportunities will see a sharp decline in visitation.

The economic viability of the Harbor itself is imperiled. The fishing industry is the cornerstone of the Harbor's revenue, and the industry sustains numerous businesses that have revenue sharing agreements with the Harbor. With the current restrictions in place in California waters, it is both logical and predictable that many sportfishermen will choose to bypass California harbors in favor of those in Oregon that offer far less restrictive fishing opportunities. This migration will not only result in reduced traffic and patronage at our harbors but will also drive a narrative that California is no longer a viable fishing destination.

Additionally, with the salmon fishery already being closed, we are witnessing a confluence of regulatory restrictions that collectively push our Harbor District to a tipping point. Revenue streams, such as slip rentals, which have consistently bolstered our finances, will experience sharp declines if the proposed regulatory changes are not adjusted. The domino effect of these regulatory changes is stark: with fewer boats docking, businesses within the Harbor District, including restaurants, marine supply stores, and other amenities, will be placed in financial jeopardy.

### **Mitigation Efforts Should Be More Targeted**

It is important to note that Marine Protected Areas (MPAs) already cover 20-30% of the quillback habitat within a 3-mile shore radius. This not only offers sanctuary to spawning stock but also creates a network designed to replenish areas outside the MPAs. Therefore, the current foundation of our marine conservation strategies is robust and provides considerable protection to the quillback rockfish.

In light of this, the proposed expansion of protected areas may be overly broad, especially because it restricts fishing access to species not under immediate threat. We must ask: Is this broad approach genuinely superior to a more targeted, species-specific intervention? The recent history and success of

MPAs indicate that a focused strategy, built on protecting key habitats and species, might be more effective and less economically damaging than wide-reaching geographical restrictions.

A more targeted approach might include the use of descending devices. Such devices enable fishermen to release inadvertently captured quillback rockfish closer to their capture depth. This approach significantly minimizes mortality linked to surface release events, including the detrimental effects of barotrauma injuries and predation. By equipping and educating fishermen on the use of these devices, we can strike a balance between conservation and economic viability without imposing unnecessarily broad restrictions.

The agency's justification for the broad closure is grounded in the notion that quillback rockfish often coexist with other rockfish species. Thus, CDFW posits that a geographical restriction is more effective than targeting the specific species in distress. This explanation, however, is rife with issues. Firstly, by casting such a wide net, CDFW undermines the precision and targeted efficacy that would be achieved by focusing specifically on quillback rockfish. Broad-based actions can inadvertently create new ecological and economic problems without adequately addressing the initial concern.

Moreover, CDFW's current approach starkly contrasts with its past decisions. When the yelloweye rockfish populations faced similar threats, regulatory actions were carefully tailored to protect that specific species rather than a sweeping, all-encompassing closure. The targeted approach not only demonstrated a clearer understanding of the nuances within marine ecosystems but also acknowledged the broader economic implications for our community.

One has to question why, if a species-specific approach was deemed suitable and effective for the yelloweye rockfish, the same logic cannot be applied to quillback rockfish? We implore the CDFW to revisit its decision-making process, ensuring that the chosen actions are consistent, targeted, and reflect a comprehensive understanding of both ecological and economic contexts, especially in light of existing MPAs and the potential of more targeted conservation tools like descending devices.

### **CDFW's Abrupt In-Season Regulatory Action Was Reckless**

An important point of contention for our community is the sudden in-season implementation of this regulatory change. It is not merely the decision itself that is concerning, but the abruptness with which it has been imposed. Charter boat businesses operate based on careful planning, taking bookings and scheduling trips months in advance. Their clientele, many of whom travel considerable distances, plan their vacations and allocate significant resources based on the assurance of these bookings.

The unforeseen change in regulations has put these businesses in a highly precarious position, forcing them to turn away business that was scheduled, in good faith, based on the existing regulations. This not only leads to immediate financial loss but damages the reputation of these businesses and the trust they've built with their clientele. It is a double blow: lost revenue now, and the potential loss of repeat business in the future, due to the public's fear of this regulatory change being suddenly implemented once again in upcoming seasons, disrupting vacations and other plans with insufficient warning.

It is the responsibility of regulatory bodies to ensure that changes, especially those with far-reaching economic implications, are made with adequate notice and due consideration for those affected. While we appreciate the challenges of managing dynamic ecosystems and the sometimes urgent need for conservation action, the suddenness of this in-season change can be perceived as irresponsible and



reckless. It overlooks the significant operational intricacies of businesses reliant on the fishery and risks long-term damage to their sustainability and the broader community's trust in regulatory bodies.

### **Request for Intervention**

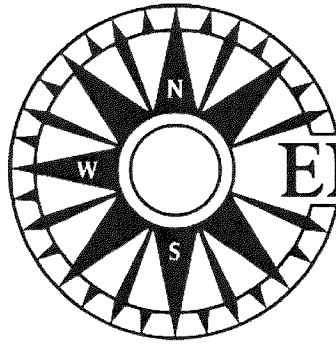
This situation calls for a more measured approach that balances the genuine need to protect our marine ecosystem with a thoughtful understanding of the human ecosystem that also relies on these resources. The current approach threatens to dismantle an intricate and long-established economic structure that has been a source of livelihood for generations.

Accordingly, **we are calling for CDFW to rescind these regulations for a period of 60-days, or in the alternative, to adjust the conservation area boundary line to permit fishing up to 10 fathoms.** It is imperative to recognize the severity of this situation and the potential for long-term damage to our community. We are more than willing to collaborate with all involved parties to find a sustainable solution that takes into account the unique characteristics of our region and its economic dependencies. Time is of the essence, and we implore you to act swiftly in the best interest of our community.

Thank you for your attention to this urgent matter. We look forward to your prompt response.

Sincerely,

Board of Harbor Commissioners  
of the Crescent City Harbor District



# ENGLUND MARINE & INDUSTRIAL SUPPLY

95 Hamburg Ave, PO Box 296, Astoria Oregon 97103  
Phone: 503-325-4341, 800-228-7051, Fax: 503-325-6421  
[www.englundmarine.com](http://www.englundmarine.com)

August 31, 2023

Mr. Brad Pettinger, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

RE: Groundfish Management Agenda Item G

Englund Marine & Industrial Supply has retail and wholesale operations throughout the western United States. Along the Washington, Oregon and California coasts we serve local businesses as well as sport and commercial fishing in small towns including our retail stores in Eureka and Crescent City California.

The recent ground fishing closure inshore of the 50-fathom boundary line in the Northern Groundfish Management Area in order to comply with federal catch limits for the quillback rockfish has had a significant negative impact on the local communities we serve in California. These impacts include economic and social effects on businesses, families and individuals directly and indirectly involved in the fishing industry, and safety impacts as small boats may be tempted to venture out past the boundary line to do their fishing.

We are certainly concerned with conservation and the future viability of our fisheries. We all share this goal. However, a consistent concern we hear about in Eureka and Crescent City is whether or not the quillback rockfish population assessment methods are appropriately aligned with this goal. It appears that current harvest limits were broadly set across the entire stock in California, north and south of Cape Mendocino. The perception is that a more geographically and depth targeted approach utilizing hook and line surveys would more accurately reflect population quantities and at what depths those populations occur.

880 SE BAY BLVD  
NEWPORT, OR  
97365  
(541) 265-9275

101 W WILSON  
WESTPORT, WA 98595  
(360) 268-9311

123 HOWERTON  
WAY  
MOORING BASIN  
ILWACO, WA 98624  
(360) 642-2308

91146 CAPE ARAGO  
HWY  
COOS BAY, OR 97420  
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CHARLESTON, OR 97420  
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191 CITIZENS DOCK  
RD  
CRESCENT CITY, CA  
95531  
(707) 464-3230

590 West  
Waterfront Dr  
EUREKA, CA  
95501  
(707) 444-9266

Perhaps then in the future, catch limits could be increased and/or fathom restrictions, if needed, could be more tailored to allow at least some nearshore ground fishing. With that in mind, we encourage the Council and the National Marine Fisheries Service to evaluate whether the assessment methods currently used are adequate.

Thank-you for your consideration of this matter.

Sincerely,

A handwritten signature in black ink that reads "Brad Anderson". The signature is written in a cursive, slightly slanted style.

Brad Anderson, CFO  
Englund Marine & Industrial Supply

Mitchell Differding

08/31/2023 09:40 AM PDT

## RE: Harvest Specifications Technical Corrections and Inseason Adjustments – Final Action

Dear Council, My name is Mitchell Differding and I am a concerned sport fisherman, fisheries scientist, and I currently work in the fisheries industry in Eureka California. Recent closures of nearshore groundfish sportfishing due to the stock assessment of Quillback Rockfish have had a negative effect on the economy of coastal California communities. While as a fisheries worker and advocate I do not want to see the degradation of any fish species, I want to make sure that decisions on quotas, stock assessments, and mitigation measures are being made with the best scientific data available. Hook and line data is more accurate for Quillback Rockfish than trawl data. Also, the MLPA areas should be accounted for as mitigation to the species mortality as those areas of habitat are permanently off limits to fishing. With improved data and MLPA mitigation I hope the Council will be able to open near shore recreational groundfish to the benefit of the coastal communities that depend on these seasons for their livelihood. Thank you, Mitchell Differding

Steve Huber  
Crescent city fishing  
09/01/2023 11:57 AM PDT

## RE: Harvest Specifications Technical Corrections and Inseason Adjustments – Final Action

I am the owner of Crescent City Fishing, a six-pack charter boat company specializing in near-shore waters. Our clients typically book their dates up to a year in advance. We service clients from all over the United States, and they love to come to our area to fish in our waters and enjoy what the area has to offer. This season was shortened from May 1 to Dec 31, to May 15 to Oct 15. The charter boat fleet understood the reason behind the shortened season was low numbers of Quillback and Copper rockfish. I did not hear of any Quillback being harvested by the Crescent City charter fleet. The data methods used are not working. There are 26 species of rockfish, including lingcod, that live near shore of Crescent City. A trawler in 300 feet of water is not going to come anywhere close to our rocky reefs. We need up-to-date data to show how the stocks are presently performing. The current methods and lack of data has crippled Humboldt and Del Norte fishing communities. With no salmon fishing in rivers and ocean, the added pressure doubled the ocean effort. How do we make up the 7 weeks of lost income? In reality, it's more like 15 weeks if we had our full season ending on Dec 31. CDFW typically inquiries about ride alongs to help with data collection. This year, we were asked the last 3 days before prior to the closure taking effect. Every boat at the public launch should have CDFW fish counters explaining the situation with the low stock counts and encourage anglers to release Quillback and Copper rockfish. The stocks of blacks, Blues, Vermillion, Canary, Cabazon and Brown rockfish made up easy limits of quality fish. As did the two lingcod limit. Dungeness crab and Pacific halibut were also readily available while their seasons were open. Let's get CDFW employees out on the charter boats collecting data. We can take you right to the Quillback grounds. It's time for new data and methods of collection. Steve Huber Crescent City Fishing 530 623-0387 [www.crescentcityfishing.com](http://www.crescentcityfishing.com)

Tom Shaw  
USFWS retired  
08/30/2023 12:31 PM PDT

## RE: Harvest Specifications Technical Corrections and Inseason Adjustments – Final Action

I have fished the north coast for over 30 years, I have a BS degree in Fisheries from HSU. I am a retired Federal Fish Biologist, I have worked for CDFG, NMFS's Foreign Fishery Observer Program, Pacific Choice Seafood, and even sold fish at the Lazio's seafood restaurant counter. I live here because I love fishing, the fishing is good. Like many others, I like having the opportunity to harvest fish for fun and food, whenever the weather, environment, and other conditions allow. In a good year, I may fish Cape Mendocino 10 times a year, and over a thirty year period, I've harvested limits of "reds," blacks and Lingcod and I can count the number of harvested Quillbacks on one hand and zero Quillbacks within and around Humboldt Bay. The Guide to Fishes of Humboldt Bay, written by the HSU Ichthyologist, Dr. Fritsche, lists over 100 fish species are known to utilize Humboldt Bay and Quillback is not listed. Here are my top 10 reasons for the State and Feds to reevaluate the rockfish and Lingcod restrictions based on our local Quillback population estimates. 1) Quillbacks never utilized this area in large numbers, therefore any impacts from catch and release would be extremely minor to the overall population. 2) Quillback do not occur in Humboldt Bay 3) Since Quillback do not utilize Humboldt Bay, they are not likely to occur within a large radius outside of Humboldt Bay. 4) The models used to predict impacts of fishing on local populations of Quillback are based upon data outside our area, with extremely low sample sizes and far reaching assumptions. 5) The models used to assess local populations and Impacts are not verified or validated. 6) Spreading out our fishery efforts over multiple species greatly reduces the impacts on individual species. For example, you may force effort to California Halibut and Lingcod resulting in additional limit restrictions caused by mismanagement 7) Quillbacks are referred as sedimentary, hanging in the rocks. Due to gear limitations in rocky terrain, they are extremely less vulnerable to catch versus compared to schooling rockfish and Lingcod. 8) Site specific data is extremely limited, for both catch data statistics and ROV efforts, both seasonal and by years. 9) Quillback is a long lived fish with high fecundity and occurs out to 200 meters (100 fathoms/600 feet). There is no justification for the 50 fathom line depth restriction. 10) There should be a thorough economic and environmental analysis, with user group participation before fishery regulatory actions. In conclusion, we agreed to set aside extremely productive conservation areas in order to preserve the ground fish biodiversity and to preserve our rights to harvest seafood, however, we are again being heavily regulated with harvest restrictions and complete blanket closures, in this instance, from this mysterious 50 fathom line and California/Oregon border. These actions result in the lack of community trust and cooperation, with many anglers now refusing to cooperate in creel censuses, thereby severely limiting an already limited dataset. Obviously, it's easier and far less expensive to close a fishery rather than the on-the-ground, regulation and site specific data collection. I recommend that sufficient funding be provided to Federal, State, private, regulatory and Universities to develop a statistically valid, site specific data collection, analysis and implementation plans to gather sufficient data to make informed decisions. The MPA and RCA preserves would make excellent controls. Until sufficient site specific data is collected and analyzed, remove the sport fishing restrictions for the Northern California area and mimic the regulations for Southern Oregon. Thank you for the opportunity to provide comment and I look forward to your response. Sincerely, Tom Shaw 450 Table Bluff Road Loleta, CA 95551 707 382 0437 fishonshaw@att.net