



BOARD OF SUPERVISORS
COUNTY OF HUMBOLDT

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December 5, 2023

California Department of Fish and Wildlife
Charlton H. Bonham, Director
P.O. Box 944209
Sacramento, CA 94244-2090

**Re: 2023 Nearshore Groundfish Fishery Season Closure
 Northern Groundfish Management Area**

Dear Director Bonham:

I am writing on behalf of the Humboldt County Board of Supervisors to express our concern with recent decisions by CDFW to close the 2023 nearshore rockfish season in marine waters off the Humboldt/Del Norte County coast (and elsewhere in California). We believe that CDFW's decision to close the nearshore groundfish fishery points to a failed system of modeling and data collection which will not be able to accurately determine the status of many nearshore species in State waters without significant investment by the Department.

As you are aware, on August 7, 2023 CDFW took in-season action to prohibit the retention of quillback rockfish within the Northern Groundfish Management Area (GMA) *due to the most recent quillback rockfish stock assessment indicating a population in severe decline*. CDFW then took more drastic steps and closed the groundfish season for all nearshore species within the 50-fathom boundary (i.e. "off-shore only rules") within the Northern, Mendocino, San Francisco, and Central GMA's on August 21, 2023. In the Southern GMA, encompassing the rest of the California coastline, these same off-shore only rules for groundfish retention went into effect on September 16, 2023, as previously planned by CDFW.

In our view it would have been more prudent for CDFW to isolate the nearshore closure strictly to the quillback rockfish if that was the intended focus of the measures taken. As such, we wish to propose that CDFW at a minimum institute a zero-retention policy for the 2024 season for quillback but allow other non-threatened rockfish to be pursued. In addition, to avoid a perpetual cycle of closures for similar species of concern such as China and Coppers, we also request a zero-retention policy until the data set is robust enough to give the PFMC and State science in what we see anecdotally in our nearshore fishery.

Additionally, we have heard from local fisherman that additional steps could be taken to mitigate rockfish mortality (including inadvertently caught quillback) such as the use of descending devices. We request that these measures can be considered by CDFW before any final decisions are made on the 2024 season.

With regard to the methodology for data collection of current stock assessments, we have met with local fisherman with knowledge of nearshore reef and other ocean features off Humboldt/Del Norte County's coastline and within the Northern GMA more broadly. Through this engagement with local subject matter experts we have discovered that the method of data collection employed by NOAA used to inform these management decisions could be improved in order to better represent stock conditions, specifically with hook and line surveys. We have expressed these concerns and offered suggestions for improved methodology in our oral comments and written statement at the Pacific Fishery Management Council (PFMC) public hearing conducted in September. Rather than re-stating what we have already stated, we will simply include our written statement to the PFMC as an attachment to this letter for your reference.

It is also our understanding that NOAA Fisheries has announce the approval of the Pacific Coast Recreational Fisheries Information Network's (RecFIN) Regional Implementation Plan outlining recreational fishing data priorities in California, Oregon, and Washington over the next several years. If implemented, NOAA believes RecFIN will collect, process, analyze, and reports statistics for fisheries along the West Coast, to be managed by the Pacific States Marine Fisheries Commission (PSMFC) and the Department, which could be a game changer for stock assessments. We urge the Department to support NOAA's efforts and insure RecFIN is implemented in 2024.

As a rural coastal community, many residents of Humboldt County are reliant on the local marine fishery for their livelihood such as charter boat owners, fishing supply stores, and seafood restaurants. Sport ocean fishing is a major attractant for visitors to our community and many sectors of our economy rely on this tourism such as grocery stores, gas stations, motels, RV parks, restaurants, etc. The effect on the individual fisherman and small business owners has been and will continue to be devastating. We are presently gathering data to inform exactly how much economic damage has been caused by the groundfish fishery closure and we anticipate the economic damage will be substantial. We encourage the Department to support economic relief efforts for Humboldt and our other coastal communities by swiftly working with the Governor to declare a fisheries disaster declaration for groundfish to provide relief for people who's livelihoods depend on this fishery. As you are aware, the estimated \$450 million loss to the States salmon fishery is a drop in the bucket compared to the states commercial and recreational ground fishery, with an nearly US\$200 million in ex-vessel value in 2018 (NMFS 2021) and overall commercial and recreational fishing activity which is responsible for \$25 billion in economic activity and the creation of 142,000 jobs in California (Miller et al. 2017).

As such, the Board of Supervisors respectfully requests your attention to this matter in order for this situation to not be repeated in 2024 and future years. Your involvement and leadership in response to this critical issue is very much appreciated.

Respectfully,

Steve Madrone, Chair
Humboldt County Board of Supervisors

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cc: Honorable Mike McGuire, Member of California State Senate
Honorable Jim Wood, Member of California State Assembly
Honorable Steve Madrone, Chair, Humboldt County Board of Supervisors
Melissa Miller-Henson, Executive Director, California Fish and Game Commission
Pacific Fishery Marine Council (*transmitted via e-portal for November PFMC meeting*)