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TIM PETRICK
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August 14, 2023

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

DRAFT LETTER - NOT YET APPROVED

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 announced by the California Department of Fish and Wildlife (CDFW) relating to quillback rockfish in the Northern Groundfish Management Area (NMA). Specifically, the CDFW has announced that effective from 12:01 a.m., Monday, August 21, 2023, recreational boat-based fishing of most species of groundfish will be restricted to areas seaward of a 50-fathom boundary line within the Northern GMA. We believe this regulatory change will have serious negative repercussions on our local economy across a broad range of individuals and businesses.

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. Our local economy is intricately interconnected, and a disruption to one sector can reverberate throughout the community.

Economic Domino Effect

The most acute impact may be to the charter boat industry, which is now facing a genuine crisis. Many charter boat captains rely heavily on nearshore fishing for their livelihood, and this closure is an existential threat to their businesses. 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. This ripple effect can substantially weaken our community's economic foundation, leading to reduced incomes and potential job losses even in sectors not directly associated with fishing.

Application of the Closure Across All Rockfish Species Was Overly Broad

One cannot overlook the glaring inconsistencies and flaws in the logic applied by the CDFW in their regulatory action. While the preservation of quillback rockfish populations is undoubtedly a noble and essential goal, the measures taken seem overly broad and misdirected.

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 due to the challenges of small harvest limits. 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? This inconsistency not only undermines the agency's credibility but also reveals a concerning tendency towards reactionary and broad-brushed decisions.

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.

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. It is essential that any changes, especially those with profound economic implications, be implemented in a manner that respects the delicate balance of ecological sustainability and economic viability.

Request for Intervention

In summary, the closure's impact extends beyond the charter boat captains and the crew members who rely on seasonal earnings. Local bait and tackle shops, marine service providers, restaurants, hotels, and other tourism-related businesses are at risk of suffering significant losses. Many of these businesses operate on thin margins, and a decline in sportfishing activities could push them into bankruptcy.

Moreover, the sudden and drastic nature of the closure leaves our community without the necessary time to adapt to these significant changes. Without immediate intervention, we could see a cascade of economic failures, leading to job losses, reduced tourism, and a long-term negative impact on our community's economic fabric.

This situation calls for a more measured approach that takes into consideration not only the conservation needs but also the socio-economic realities of the communities affected. We must balance 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.

We urge you to recognize the severity of this situation and the potential for long-term damage to our community. We strongly request your immediate intervention to reverse or modify these regulatory changes in a manner that balances the vital need for conservation with the equally essential requirement to support our local economy.

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,

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Board of Harbor Commissioners
of the Crescent City Harbor District