

From: [REDACTED]
To: [FGC](#)
Subject: Comments FGC meeting 8/6/14: Proposed Amendment Sections 163 and 164, Title 14, CCR, Harvest of Herring and Harvesting of Herring Eggs,
Date: Saturday, July 12, 2014 1:56:09 PM
Attachments: [California Fish and Game Commission June 7.docx](#)

Please see attached letter re: proposed change to herring regulations.

June 7, 2014

Steven H. Kramer



California Fish and Game Commission

1416 Ninth Street

Sacramento, CA 95814

RE: REQUEST FOR AUTHORIZATION TO PUBLISH NOTICE OF COMMISSION
INTENT TO AMEND COMMERCIAL HERRING REGULATIONS (SECTIONS 163
AND 164, TITLE 14, CCR)

Dear Commissioners,

I wish to comment on the proposal to lower the Pacific Herring quotas in Humboldt Bay to zero. Doing so would close the fishery in the near future and possibly for good.

I am a part-time commercial fisherman. When I fish, it is for roe herring in Humboldt Bay under my CA Herring Permit (H3). I have been fishing for herring in the bay since 1998. I have a considerable amount of time and money invested in the fishery (boat, equipment, license fees over the years, etc.) To my knowledge, only one other boat, also fishes the bay.

For full time work, I am a fisheries biologist for a federal agency. I possess a Masters degree in fisheries biology from Humboldt State University.

In approximately 2004 I ceased fishing for herring because of several reasons. First, the herring population seemed to crash and there were too few fish around to make it worthwhile. Second, the Eureka cold storage facility closed, which would make it impossible to land, store, sell, and ship tons of frozen herring to buyers in various locations that are out of this area.

To my knowledge, no one has commercially fished for herring in Humboldt Bay for approximately 10 years, which effectively was a self-imposed closure of the fishery by the fisherman. In addition, I am not aware of any spawning/population surveys by CA Fish and Wildlife (CDFW) since approximately 2007. I believe that the last surveys were by Mr. John Mello who managed the herring fisheries for CDFW until his recent retirement.

In conclusion, the Humboldt Bay roe herring the fishery is already closed. CDFW has not done any surveys in years, and therefore has no current information on what the status of the herring population is in Humboldt Bay. It seems that imposing a zero quota is unnecessary, and is in effect, a management solution looking for a problem, where there is no management problem. The fishermen in Humboldt Bay have a self-imposed closure in place. Setting the quota at zero would be the equivalent of not letting a good deed go unpunished.

Rather than close the fishery, I would like to suggest that annual spawning/population surveys should be continued and conducted to gather information on what the actual current status of the Humboldt Bay herring population is. If CDFW is unable to conduct the surveys, then perhaps the Fish and Game Commission, CDFW, or other entity, could issue a request for proposals, for independent surveys by consultants or others.

Thank you for the opportunity to comment on this proposed regulation change.

Sincerely,

Steven H. Kramer