

STATE OF CALIFORNIA  
FISH AND GAME COMMISSION  
STATEMENT OF REASONS FOR REGULATORY ACTION  
(Pre-adoption Statement of Reasons)

Amend Subsection (d) of 27.80  
Title 14, California Code of Regulations  
Re: Ocean Salmon Sport Fishing Regulations effective May 1, 2015

- I. Date of Initial Statement of Reasons: September 16, 2014
- II. Date of Pre-adoption Statement of Reasons: March 25, 2015
- III. Dates and Locations of Scheduled Hearings:
  - (a) Notice Hearing: Date: December 3, 2014  
Location: Van Nuys, CA
  - (b) Discussion Hearing: Date: February 11, 2015  
Location: Sacramento
  - (c) Adoption Hearing: Date: April 17, 2015  
Location: Teleconference
- IV. Description of Modification of Originally Proposed Language of Initial Statement of Reasons:

No changes have been made in the originally proposed regulatory language.
- V. Reasons for Modification of Originally Proposed Language of Initial Statement of Reasons:

No changes have been made in the originally proposed regulatory language.
- VI. Summary of Primary Considerations Raised in Opposition and in Support:

Four comments were received.

Comment one (Jim Newton, written) asked for a change to the inland salmon fillet restrictions as they also affect ocean salmon fishing.

Comment one response: Salmon filleting is allowed from ocean waters after bringing the fish ashore off a boat. The portion of the comment for inland changes is outside the scope of this marine rulemaking.

Comment two (Xai Her, written) requested that only single point barbless hooks be used when fishing for salmon in both inland and ocean waters.

Comment two response: For ocean waters north of Point Conception, the

barbless hook restriction for salmon fishing is already in place. The harvest of salmon south of Point Conception is so relatively low and sporadic that requiring barbless single-point hooks was determined to be not warranted and would be an unnecessary hardship on the normal fishing activities occurring in Southern California. The portion of the comment for inland changes is outside the scope of this marine rulemaking.

Comment three (Paul Weakland, verbal) questioned why report cards aren't used in the recreational ocean salmon fishery.

Comment three response: Since 1962, the Department has monitored California's ocean salmon recreational sport fishery using a random stratified sample design that produces statistically-sound estimates of catch and effort. In addition, the program requires a minimum sampling rate of 20% by half-month period and management areas so that fishery managers can determine the contribution of specific salmon stocks to California fisheries and ensure conservation objectives for all stocks are met. The Department's current recreational salmon sampling program is a more scientific approach to fishery management than is a report card system.

Comment four (Paul Weakland, verbal) inquired as to how many adipose fin-clipped fish retrieved in ocean salmon fisheries do not contain coded-wire tags and why this issue is not discussed.

Comment four response: In 2014, the Department removed the heads from 19,652 adipose fin-clipped salmon observed during the sampling of California's ocean Chinook salmon fisheries. Of these, 843 (4.3%) heads did not contain a coded-wire tag and it is assumed that these fish shed their tags prior to being harvested. Most hatcheries report that 5-10% of their juvenile salmon production shed their CWTs prior to release and this proportion is used when calculating the production factor for each release (i.e., how many total hatchery fish does each CWT recovery represent). The issue of shed tags in adipose fin-clipped salmon is not generally discussed during Fish and Game Commission meetings because the occurrence rate is relatively low and it does not impact fishery management decisions.