

FISH CONTAMINATION EDUCATION COLLABORATIVE

ENFORCEMENT REPORT

August 2019 – July 2020

Palos Verdes Shelf Superfund Site

Los Angeles County, California

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EXECUTIVE SUMMARY

The United States Environmental Protection Agency (EPA) created the Fish Contamination Education Collaborative with representatives of federal, state, and local agencies, as well as community-based organizations that carry out various outreach and education activities. Enforcement represents one of the four Institutional Controls implemented to address the sediment contamination at the Palos Verdes Shelf Superfund Site (the Site). Enforcement consists of enforcing existing white croaker regulations for commercial and recreational anglers, along with inspections of retail food facilities and enforcement of market protocol under the California Health and Safety Code. Efforts also include monitoring and enforcing the daily catch limit and the commercial no-take zone for white croaker.

In February 2015, the EPA contracted EA Engineering, Science, and Technology, Inc. (EA) to coordinate with enforcement agencies/inspectors to support enforcement activities and provide outreach materials as needed. Additionally, EA conducted fish identification training to Los Angeles County Department of Public Health (LACDPH) and City of Long Beach Department of Health and Human Services, Bureau of Environmental Health (City of Long Beach) inspectors in September 2015, July 2017, and August 2018. Due to the COVID-19 pandemic and State restrictions on public gatherings in March 2020, no training was conducted during this reporting period.

Enforcement inspection data (markets and restaurants) was collected by the City of Long Beach. LACDPH also typically conducts enforcement inspections but did not during this reporting period due to the COVID-19 pandemic public restrictions. Therefore, inspections were performed at restaurants and markets that are primarily located in Long Beach. Markets and restaurants targeted for inspections were identified by EPA and stakeholder input. Some of these restaurants and markets previously sold white croaker illegally. The City of Long Beach conducted 62 market (24) and restaurant (38) inspections in August through September 2019 and January through February 2020. The City of Long Beach reported that 50 percent of markets and restaurants were aware of the contamination. The Long Beach markets and restaurants reported that health inspectors were the primary source of their awareness. Awareness increased since the last reporting period (35 percent aware) to 55 percent aware and is on par with the reporting period prior to that. The data suggests that the enforcement awareness could continue to be improved by additional and/or more frequent outreach.

Recreational and commercial fishing enforcement data was collected by the California Department of Fish and Wildlife (CDFW) who conducted 47 recreational inspections between September 2019 and March 2020 with an average of 29 anglers present per inspection. Due to the COVID-19 pandemic and closures of the piers in March 2020, no enforcement data was collected during the second quarter of 2020. CDFW also conducted two commercial inspections at one fish business located in Torrance, California in October 2019 and again in February 2020. The following tables summarize the results of the CDFW enforcement inspections.

CDFW Recreational Inspections				
# of inspections	47			
# of pier and jetty inspections	34			
# of boat patrol inspections	6			
# of beach and intertidal inspections	7			
# of inspections where at least one fisherman reported awareness of contamination	18			
# inspections where at least one fisherman reported that they would keep white croaker if caught	12			
# of inspections with white croaker observed	15			
# of white croakers seized	0			
# of inspections with barracuda observed	1			
# of barracudas seized	0			
# of inspections with topsmelt observed	11			
# of topsmelt seized	0			
# of inspections with barred sand bass observed	7			
# of barred sand bass seized	3			
# of inspections: black croaker observed	0			
# of black croaker seized	0			

CDFW Recreational Fishing Inspections Overview: September 2019 – March 2020

CDFW Commercial Fishing Inspections Overview: October 2019 – February 2020

CDFW Commercial Inspections					
# of inspections	2				
# aware of white croaker catch ban area	1				
# with intent to catch/buy/sell white croaker	0				
# of white croaker observed	0				
# of white croaker seized	0				
# of violations reported	0				
# of informational sheets provided	0				

Based on the inspection data, Do Not Consume (DNC) fish, specifically the white croaker, were not observed during the commercial inspection and no commercial inspections revealed intent to catch, buy, or sell white croaker. No other DNC fish were observed during commercial inspections. White croaker were found among recreational fishermen during 32 percent of the inspections. Other DNC fish, topsmelt and barred sand bass, were observed with slightly less frequency in recreational inspections. At least one angler interviewed stated that they were aware of the fish contamination issues in approximately 38 percent of the recreational inspections. This is down from 55 percent during the last reporting period. More anglers reported awareness during piers and jetty inspections (44 percent, n=34) compared to boat inspections (16 percent, n=6) and beach inspections (29 percent, n=7). Inspections where at least

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one angler expressed an intention to keep white croaker if they caught it occurred during 26 percent of the total inspections (12 of 47). The intention to keep white croaker was found more often during beach inspections (29 percent, n=7) and pier and jetty inspections (26 percent, n=34) than during boat inspections (16 percent, n=6). This indicates that while anglers on piers and jetties are most aware of contamination issues, they are also most likely to keep white croaker. The results suggest there may be new anglers on the piers and the need for more outreach about the health effects of consuming contaminated fish. However, due to the COVID-19 pandemic, less data was collected during this reporting period when compared to previous periods and will need to be reassessed when public restrictions are lifted and normal activities resume.

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ACRONYMS AND ABBREVIATIONS

CDFW City of Long Beach	California Department of Fish and Wildlife City of Long Beach Department of Health and Human Services, Bureau of Environmental Health
DNC	Do Not Consume
EA EPA	EA Engineering, Science, and Technology, Inc. United States Environmental Protection Agency
FCEC	Fish Contamination Education Collaborative
LACDPH	Los Angeles County Department of Public Health
SGA Site	S. Groner Associates Palos Verdes Shelf Superfund Site

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1.0 INTRODUCTION

The United States Environmental Protection Agency (EPA) created the Fish Contamination Education Collaborative (FCEC) with representatives of federal, state, and local agencies, as well as community-based organizations that carry out various outreach and education activities. Enforcement represents one of the four Institutional Controls implemented to address the sediment contamination at the Palos Verdes Shelf Superfund Site (the Site). Enforcement consists of enforcing existing white croaker regulations for commercial and recreational anglers, along with inspections of retail food facilities and enforcement of market protocol under the California Health and Safety Code. Efforts also include monitoring and enforcing the daily catch limit and the commercial no-take zone for white croaker.

EPA, Los Angeles County Department of Public Health (LACDPH), and Orange County started collecting market data in 2004 to determine whether white croaker caught in and around the Site were reaching local markets. Over time, anecdotal reports began to suggest that white croaker was no longer being found in the markets. In 2012, EPA's previous contractor, S. Groner Associates (SGA), compiled a report analyzing the data collected between 2008 and June 2011 with the purpose of providing a basic status report and to describe general observations related to white croaker. In May 2013, SGA compiled a report analyzing the data collected between July 2011 and September 2012. Additionally, SGA prepared a report in April 2014 summarizing data collected by California Department of Fish and Wildlife (CDFW) between October 2012 and September 2013, with the scope of providing observations related to white croaker.

In February 2015, EPA contracted EA Engineering, Science, and Technology, Inc. (EA) to coordinate with enforcement agencies/inspectors to support enforcement activities and provide outreach materials as needed. Additionally, EA conducted fish identification training for LACDPH and City of Long Beach Department of Health and Human Services, Bureau of Environmental Health (City of Long Beach) inspectors in September 2015, July 2017, and August 2018. Previous enforcement reports were prepared by EA for the periods between February 2015 and July 2016, February 2016 and July 2017, August 2017 and July 2018, and August 2018 and July 2019. The reports included enforcement data collected by CDFW recreational and commercial enforcement inspections and the City of Long Beach, when available.

This enforcement report covers the period of August 2019 through July 2020. During the reporting period, State restrictions on public gatherings and closures of non-essential businesses was implemented in March 2020 due to the COVID-19 pandemic. City of Long Beach and CDFW provided data for inspections they performed within this period and prior to closures of public spaces in March 2020. LACDPH did not conduct any inspections during the reporting period.

2.0 ENFORCEMENT INSPECTIONS

CDFW staff conducts inspections of in-water commercial and recreational anglers, and shoreline recreational anglers. LACDPH staff conducts market inspections in Los Angeles County and the City of Long Beach conducts inspections of markets and restaurants in Long Beach. In the past, the Orange County Health Care Agency, Environmental Health Division conducted the inspections of markets and restaurants in Orange County. Based on the data collected prior to EA's involvement in the project, Orange County determined that white croaker was not being sold in markets and declined to continue involvement in this program.

Market/restaurant inspections were conducted by the City of Long Beach between August 2019 and February 2020. CDFW reported recreational fishing inspections between September 2019 and March 2020, and commercial fishing inspections in October 2019 and February 2020. Due to the COVID-19 pandemic, inspections ceased in March 2020. LACDPH typically conducts enforcement inspections but did not during this reporting period, partly due to the delay of the fish identification training and COVID-19 pandemic public restrictions. The inspections consisted of the following:

- Market and restaurants (City of Long Beach)
- Recreational (shoreline and in-water) fishermen (CDFW)
- Commercial (in-water and wholesale) fishing operations (CDFW).

The City of Long Beach conducted 24 market and 38 restaurant inspections; 4 inspections were conducted in August and September 2019 and the rest were conducted in January and February 2020. The restaurants and markets are located in Long Beach. As part of the inspections, the market or restaurant is asked where the fish is from and the invoice is checked. Retailers are required to purchase fish from licensed vendors. The markets and restaurants targeted are ethnic, sell seafood, and/or have sold white croaker illegally in the past.

CDFW conducted two commercial fishing inspections of one fish business in October 2019 and February 2020. Additionally, 47 recreational inspections were conducted along the Palos Verdes Peninsula shoreline (including areas between Malaga Cove and Long Point, Abalone Cove and Inspiration Point, and Royal Palms and Cabrillo Beach Jetty). Recreational fishing inspections include inspecting piers, jetties, boats, and beaches. During recreational inspections, the wardens check bags for illegal fish and size limits and conduct outreach about the dangers of white croaker and other relevant topics. The bag limit for recreational fishing is 10 white croakers. CDFW wardens fill out one inspection form per fishing mode a day. CDFW has focused inspections of commercial vessels in the red zone, in particular the areas surrounding the white croaker catch ban off of Palos Verdes and Fish Harbor where a large number of anglers dock their boats.

3.0 ENFORCEMENT INSPECTION RESULTS

An analysis of the enforcement inspections was performed to summarize major findings from the

inspections. The analysis focused on providing a general descriptive summary (or descriptive statistics) of the inspections. In some cases, there were repeat inspections done at the same sites during the year. As a result, some observations were correlated, and thus inferential statistics could not be calculated.

3.1 MARKETS AND RESTAURANTS

The City of Long Beach performed 62 enforcement inspections (24 markets and 38 restaurants); 4 inspections were conducted in August and September 2019 and the rest were conducted in January and February 2020. The City of Long Beach targeted ethnic restaurants and markets (e.g., Mexican, Chinese, Vietnamese) in the Long Beach area. Informational brochures and tip cards were distributed to each of the markets and restaurants. Five informational topics were covered during the inspections including reminders to buy from reputable sources, health effects and at-risk populations, reminders to keep and file all invoices, identification of white croaker and reasons for concern, and locations of catch ban and contaminated zones. Based on the reported results, 31 businesses (50 percent) were aware of the contamination. Of those aware, 26 businesses cited their source of their awareness as health inspectors (84 percent), 2 businesses cited "Do Not Consume" (DNC) pier signage (6 percent), and 3 businesses cited "other sources" (10 percent). During these inspections, 4 markets and 6 restaurants (16 percent) stated that they had been offered fish by an unpermitted vendor, but none purchased from them. No white croaker was identified during these inspections

As part of the commercial fishing inspections, CDFW inspected a commercial fish business, as furthered discussed in Section 3.3.

3.2 RECREATIONAL FISHING

Inspection modes included piers and jetties, boat patrol, and beach and intertidal areas. The recreational inspection data was collected between September 2019 and March 2020 using one data sheet per inspection. There were 47 recreational fishing inspections conducted in this time period. Out of those, 72 percent were pier and jetties inspections, 13 percent were boat patrols, and 15 percent were beach and intertidal inspections. A total of 1,366 anglers were reached during the pier and jetties (1,099), boat patrols (154), and beach and intertidal (113) recreational inspections. On average, 29 anglers were interviewed per inspection.

3.2.1 Awareness of Fish Contamination Issues

At least one angler interviewed reported being aware of the fish contamination issues during 18 out of 47 inspections (38 percent). This includes 15 out of 34 pier and jetties inspections, 2 out of 7 beach inspections, and 1 out of 6 boat inspections. Additional information is included in the following table.

Table 1. Reported Hwareness of Fish Containination by Fishing Fioue.							
	Reported Awareness						
Fishing Mode	Yes	% Yes by	% of Yes All	No	% No by	% of No All	
		Mode	Modes		Mode	Modes	
Piers and Jetties	15	44%	83%	19	38%	66%	
Boat Patrol	1	17%	6%	5	83%	17%	
Beach and Intertidal	2	29%	11%	5	71%	17%	
Total	18	38%	-	29	62%	-	

 Table 1. Reported Awareness of Fish Contamination by Fishing Mode.

3.2.2 Intentions to Keep White Croaker

When asked about intentions to keep white croaker if they caught it, at least one angler responded "yes" on 12 of the 47 inspections (25.5 percent). Of inspections where at least one angler reported that they were aware of the fish contamination, 22 percent (n=4) had at least one angler who intended to keep white croaker. Inspections where at least one angler expressed an intention to keep white croaker occurred during 9 of 34 pier and jetty inspections, 1 of 6 boat inspections, and 2 of 7 beach inspections. Additional information is included in the following table.

	Would fishermen keep White Croaker if they caught it?							
Fishing Mode	Yes	% Yes by Mode	% of Yes All Modes	No	% No by Mode	% of No All Modes		
Piers and Jetties	9	37.5%	75%	25	73.5%	71%		
Boat Patrol	1	17%	8%	5	83%	14%		
Beach and Intertidal	2	29%	17%	5	71%	14%		
Total	12	25.5%	-	35	74.5%	-		

Table 2. Intentions to Keep White Croaker.

3.2.3 Do Not Consume Fish Observed and Seized

Approximately 123 total white croaker were observed in 15 inspections (32 percent). No white croaker were seized during the inspections. Multiple areas were patrolled during each inspection, and the specific location of white croaker was not recorded. White croaker was found most frequently and/or in larger quantities during patrol of the Long Beach Pier, shoreline, and Davies Ramp. Other recorded locations included Venice Beach, Seal Beach, Redondo Beach, Palos Verdes, Alamitos Bay, Pier J, San Pedro, Belmont Pier, 72nd Place Jetty, Shoreline Drive, Shoreline Marina, Harbor Scenic Drive.

One barracuda was observed at Marina Del Rey Harbor during inspections. No barracuda were seized.

Approximately 43 topsmelt were observed in 11 inspections (23 percent). There were no topsmelt seizures reported. Multiple areas were patrolled during each inspection and the specific location of topsmelt was not specified. Topsmelt was most frequently found and/or in larger quantities during patrol of Long Beach Pier, shoreline, and Davies and South Shores Ramps. Other recorded locations included Cabrillo Pier, Belmont Pier, 72nd Place Jetty, Marina Bridge, San Gabriel River, Dockweiler State Beach, Shoreline Drive, Shoreline Marina, Harbor Scenic Drive, Seal Beach Pier, Marina Del Rey, Seal Beach, Venice Beach, Redondo Beach, and Alamitos Bay.

Approximately 55 barred sand bass were observed in 7 inspections (15 percent). Three barred sand bass were seized during inspections. Multiple areas were patrolled during each inspection and the specific location of barred sand bass was not specified. Barred sand bass was most frequently found and/or in larger quantities during patrol of Long Beach Pier, shoreline, and Davies and South Shores Ramps. Other recorded locations included Alamitos Bay, Los Angeles Harbor, Seal Beach, and San Pedro.

No black croaker were observed during inspections.

3.2.4 Citations, Warning, and Violations

There was one bag limit violation among the 47 inspections. There were no citations or warnings related to white croaker. There were a total of 46 warnings and 27 citations for other fish violations issued. Most citations and violations were not related to the DNC fish and were most often for violations relating to fishing without a license and use of more than one fishing rod per angler on a pier.

3.2.5 Information Provision

Tip cards and/or enforcement brochures were distributed during 40 of 47 inspections (85 percent). During the inspections, the materials were sometimes provided in multiple languages. An English language tip card was provided for the 40 inspections (n=40). In addition, a Spanish tip card was provided 36 percent of the time (n=17) and a Vietnamese tip card was provided 2 percent of the time (n=4).

3.3 COMMERCIAL FISHING

Commercial fishing inspection data was collected by CDFW in October 2019 and February 2020. The same fish business, in Torrance, California, was inspected during each inspection.

3.3.1 Awareness of Fish Contamination Issues

Among the commercial fishing inspections, the inspected business reported that they were unaware during the October 2019 inspection but reported awareness when inspected again in February 2020. During both inspections, respondents indicated that they had no intention of catching, buying, or selling white croaker.

3.3.2 White Croaker Identified

During commercial inspections, no white croakers were observed, seized, or collected.

3.3.3 Do Not Consume Fish Observed and For Sale

During commercial inspections, there were no other DNC fish observed or intended for sale.

3.3.4 Violations

During commercial inspections, there were no violations reported regarding white croaker. Unrelated violations were reported during the February 2020 inspection.

4.0 ENFORCEMENT INSPECTION RESULTS DISCUSSION

4.1 MARKETS AND RESTAURANTS

No commercial white croaker violations were found during inspections performed by the City of Long Beach and CDFW. This suggests that the enforcement inspections and informational materials are generally successful at educating the markets and restaurants about the fish contamination. During the last reporting period, the City of Long Beach reported that 35 percent of markets and restaurants were aware of the contamination (n=22). During the current reporting period, the City of Long Beach restaurants were aware of contamination (n=31). Health inspectors were the most cited sources of awareness.

These results suggest that awareness improved over the previous reporting period. However, awareness could be improved by additional and/or more frequent health inspections and continued monitoring and maintenance of the DNC fish signs (reported separately in the Annual Pier Sign Summary Report). The list of markets and restaurants is periodically evaluated and updated to replace closed businesses. Approval of a replacement business takes time which affects the inspection schedules. High staff turn-over rates may affect the continuity of knowledge of the fish contamination information. In addition to more frequent health inspections, follow-up outreach to contacts at the markets and restaurants could be considered to facilitate the continuity of knowledge. City of Long Beach also performed community outreach activities, included in the Annual Outreach Report, submitted separately.

City of Long Beach recorded instances of markets and restaurants being offered fish by nonpermitted vendors during 16 percent of the total inspections (10 of 62 inspections). Of the 10 reported, 4 were markets (40 percent) and 6 were restaurants (60 percent). While none of the markets or restaurants purchased from the unpermitted vendors, continued education and tracking is recommended.

4.2 RECREATIONAL FISHING

Recreational fishing inspections were dramatically decreased compared to the previous reporting period (47 versus 150 inspections). This is influenced by the ceasing of inspections in March 2020 due to the COVID-19 pandemic.

Inspections reported white croaker in 32 percent of inspections, barracuda in 2 percent, topsmelt in 23 percent, barred sand bass in 15 percent, and black croaker in 0 percent. At least one angler interviewed stated that they were aware of the fish contamination issues in approximately 38 percent of the recreational inspections. This is down from 55 percent during the previous reporting period and down from 65 percent during the reporting period prior to that. More anglers reported awareness during piers and jetty inspections (44 percent, n=34) compared to boat inspections (17 percent, n=6) and beach inspections (29 percent, n=7). Inspections where at least one angler expressed an intention to keep white croaker if they caught it occurred during 26 percent of the total inspections (12 of 47). The intention to keep white croaker was found during pier and jetty inspections 26 percent of the time (n=34), during beach inspections 29 percent of the time (n=7), and during boat inspections 17 percent of the time (n=6). These results indicate that awareness is decreasing among anglers across all three inspection location types. This may be a result of new anglers as well as decreased enforcement during the reporting period due to the COVID-19 pandemic.

Additionally, though anglers were more aware of contamination at piers and jetties, anglers still reported intention to keep white croaker if caught. The results suggest there may be need for more outreach in these areas about the health effects of consuming contaminated fish.

It is a continued recommendation to add a question to CDFW's Recreational Fishing inspection form to gauge the source of awareness of the fish contamination (e.g., DNC fish signs, community based organizations, media), similar to CDFW's Commercial Inspection form, which asks the source of awareness of the commercial catch ban. This information is useful to evaluate how to better improve what modes of outreach can be performed to increase recreational fishing awareness.

Data from multiple anglers are included for each inspection which presents potential limitations on the data evaluation. The inspections did not collect information on each of the anglers interviewed, therefore it could not be determined whether there is a bias in the data due to repeat anglers being interviewed. Alternatively, because the statistics are being generated for each inspection event rather than for each angler interviewed, without a better understanding of the variability in responses per inspection event, there is no way to develop and apply a weighting factor to the response counts for the different fishing modes. With multiple locations per form, it is unclear where, precisely, DNC fish are being identified most frequently. Additionally, given this reporting format, the actual percent of anglers who are aware of contamination is dramatically skewed upward; if even one angler is aware of contamination (average of 29 anglers interviewed per inspection), data will indicate that all interviewed anglers were aware. Additionally, a selection bias could have occurred if the subset of fishermen were selected for repeated inspections due to a specific reason, which could limit the broader applicability of the results. Another limitation to the datasets is the small sample size. Due to limited sample size, findings generated from the dataset may only apply for the specific sample population and may not be applicable to the population of the counties. To address some of these issues, an improvement to the Recreational Fishing inspections form a may include collection of this more detailed data.

Outreach materials in English, Spanish, and/or Vietnamese were distributed during 85 percent of the inspections. It is recommended to increase distribution of materials during the inspections, particularly when inspections find white croaker and/or angler intent of keep white croaker.

4.3 COMMERCIAL FISHING

In the inspections performed, there were no white croakers observed and there were no white croaker violations issued. This suggests that commercial fishing operations were in compliance with white croaker regulations. However, due to very limited sample size, findings generated from the dataset may only apply for the specific sample population and may not be applicable to the population of the counties. The commercial fishing inspection amounts and frequency could be increased to address awareness. Additionally, the Commercial Fishing inspection form could benefit from better tracking of the specific location, outreach materials in each language (similar to the Recreational Fishing form), to better track angler demographics.

5.0 FISH IDENTIFICATION TRAINING

The fish identification training for the City of Long Beach and Los Angeles County inspectors was not held during the reporting period due to the COVID-19 pandemic and associated restrictions on public gatherings.

6.0 CONCLUSIONS

Enforcement is a key Institutional Control as part of FCEC program. Based on the inspection data, DNC fish, specifically the white croaker, was not observed during restaurant/market or commercial inspections. However, approximately 123 white croaker were found among fishermen in 32 percent of recreational fishing inspections. This is generally consistent with the previous reporting periods (2016-2019) in which white croaker was found in approximately 30 percent of inspections, and down from 58 percent since the 2015-2016 reporting period. Other DNC fish were less frequently observed which is also consistent with the previous reporting periods. During this reporting period, awareness of fish contamination increased for market and restaurant inspections conducted by the City of Long Beach, but decreased for recreational fishing inspections conducted by CDFW compared to the last reporting period. However, due to the COVID-19 pandemic, the total number of recreational fishing inspections decreased to 30 percent compared to the previous reporting period of 35 percent. Additionally, awareness during the recreational fishing inspections decreased to approximately 38 percent, down from approximately 54 percent during the previous reporting period. More anglers reported awareness

during piers and jetty inspections compared to boat and beach inspections but intentions to keep white croaker were about equal between each location type. However, there were significantly more pier and jetty inspections (n=34) compared to boat (n=6) and beach (n=7) inspections. In 32 percent of recreational inspections, fishermen reported they would keep white croaker if they caught it. This is the same as the last reporting period and is generally consistent with previous reporting periods (approximately 30 percent). These results indicate there is still need for more outreach concerning the health effects of consuming contaminated fish.

As mentioned previously, COVID-19 pandemic State restrictions on public gatherings were implemented in March 2020 curtailing outreach education and enforcement activities. During this time, only essential businesses (e.g., medical facilities, grocery stores, restaurant food takeout/delivery) were open to the public. Outdoor activities (e.g., boating, visits to the piers) were only again permitted by Los Angeles County toward the end of this reporting period. There remains a need to continue outreach education and enforcement to open markets/restaurants and during boating inspections. It is recommended that the enforcement partners resume inspections, to the extent practicable and safe, as restrictions are lifted. Other activities may still be performed without in-person contact such as updating the CDFW inspection forms, updating the list of markets/restaurants to replace closed businesses, scheduling virtual meetings to follow-up on outreach to markets/restaurants, launching virtual fish identification training, and inspecting the DNC fish sign status (reported separately) for visibility to returning pier users. These activities may be performed to continue enforcement and outreach activities during the COVID-19 pandemic and help to resume and accelerate activities once the State restrictions are lifted. This page intentionally left blank.