



Crab Boat Owners  
Association, Inc.  
San Francisco

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To: Department of Fish and Wildlife

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cc: Dungeness Crab Task Force- [info@dungenesscrabtaskforce.com](mailto:info@dungenesscrabtaskforce.com)

Dear Sirs:

Dungeness crab fishermen understand that the past two years of Dungeness crab season management have been particularly challenging. We appreciate that these times have been unprecedented and that the Department of Fish and Wildlife (DFW) has done their best to adapt to these conditions in the face of a complex and diverse fishery spanning the entire California coast.

Many questions remain regarding staggered openings, fair start provisions, boundary creation, test protocols and split districts etc. We believe that these issues are best handled through the Dungeness Crab Task Force process, and that collaboration between industry and the Department is required to best manage the fishery.

However, we have some feedback for the Department regarding communication and consistency during the opening(s) of the 2016-2017 season, and a suggestion that we in believe all ports would agree could reduce the confusion and stress that many experienced this year.

As you know, in 2013-2014 there were more than 480 active Dungeness crab permits in California. These permits are based in more than 7 ports spanning several management districts and represent all sizes of commercial fishing businesses and vessels. All of these permit holders are doing their best to make the safest and most profitable business decisions in an inherently dangerous derby fishery.

A certain level of uncertainty is unavoidable and the nature of crab fishing, particularly with the additional issue of Domoic acid. However, it is our belief that a consistent communication protocol from the Department in advance of any season opening could reduce this uncertainty and better allow commercial fishing businesses to plan for safe and efficient harvest of Dungeness crab.

It is important for non-fishermen to understand that there is much more to crab fishing than going out and setting and pulling gear. The safety of crews and vessels is impacted by weather conditions that vary by vessel and port. There are also many other factors that impact safety and productivity for vessels, and all are best mitigated by the ability to plan accordingly. For example, vessels loaded with heavy crab gear before setting are much more dangerous than unloaded vessels. Some vessels have the additional weight of a tanked hull. Some vessels cannot carry all of their gear on deck and therefore require several trips in and out of port to get gear out safely. Some vessels travel from

one port to another and need to stage gear and equipment. Some fish on grounds far from the nearest harbor requiring many hours of running time. Some harbors have difficult bars to cross. There are countless important and varying issues to consider when operating a Dungeness crab business. Decisions made by crab captains can mean life or death, literally and economically in the Dungeness crab fishery.

In 2015-2016 for most of the season there was a clear understanding that each area needed 2 clean tests, and that areas would open on District lines. This knowledge allowed fishermen to watch the CDPH website and based on test results make business planning decisions. This is not to advocate for any particular testing protocol, merely to express that having an understanding of how test result information from CPDH was being interpreted at that time allowed for some business planning for the fleet.

During the 2016-2017 season openers, the fleet had no such ability to anticipate or plan for safe harvest, because at any time, anything could happen.

For example, in November, after the fleet understood that CDPH and CDFW were closed for the holiday a notice was posted at 5 pm on 11/23/16 that an area would be opening on 12/1. At 5pm on 12/1 notice was provided for another area that gear could be legally set at 6 am on 12/2, which caused a dangerous 13-hour notice to scramble. In another instance, notice was at 5 pm on 12/20 for a set time 3 days later on 12/23, which resulted in unexpected gear hauling over the Christmas holiday in some areas. This actually forced fishermen to take over management of the fishery and create a gentlemen's agreement in some areas to restore sanity to the opener.

Lack of consistency as to how testing results were being interpreted and when notice might be given for an opening, and how much notice would be given, created a situation where fishermen were forced to react rather than plan, which can create dangerous conditions.

We understand that the Department was doing the very best to provide information in a timely fashion and to allow fishing opportunities as soon as allowable, and we appreciate that. We are not advocating for any particular policy or protocol, but want the Department to understand the importance of consistent communication and action throughout the season.

We would like to ask for the department to work with the Dungeness Crab Task Force to create a standard and consistent testing, communication, and season opening protocol before the 2017-2018 season begins. We would ask that this protocol be public and followed once the season(s) begin to open.

We appreciate the opportunity to provide this feedback and suggestion.

Sincerely,



Porter McHenry  
Half Moon Bay



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Larry Collins  
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