

Public comment letter from Geoff Shester, Oceana, to the California Dungeness Crab Task Force (DCTF) and their associated Executive Committee. Submitted April 23, 2015.

Dear Rachelle,

Thank you again for the opportunity to address the Dungeness Crab Task Force Executive Committee on last Monday's call during public comment. We are encouraged by the response of the Committee, particularly the recognition of the importance and urgency of this issue, and the decision to convene an ad hoc working group to address this issue comprised of DCTF members, fishermen, CDFW, NMFS, and conservation groups including Oceana. As I stated in my comments, Oceana is hopeful that together we can find collaborative solutions and ensure that public communications about this issue recognize this collaborative effort.

We are working with other partner conservation organizations Earthjustice and Center for Biological Diversity on a letter to the state (Department and Commission) to establish formal communications and outline the concerns. The upcoming letter, which we plan to submit next week, will:

1. Recognize the efforts that have already been taken in various fisheries including Dungeness crab that reduce whale entanglement risks (derelict gear retrieval, trap limits, etc)
2. Commend the DCTF for its attention to this issue and for establishing a working group to address entanglements.
3. Review recent data on west coast whale entanglements with a focus on California
4. Review relevant legal background to the issue of whale entanglements.
5. Request that the state work with NMFS to secure incidental take authorizations under the MMPA and ESA for state-managed pot/trap fisheries including Dungeness crab, to reduce legal uncertainty for these fisheries and participating fishermen.
6. Request the state develop and implement measures by the beginning of the next fishing season (Nov. 2015), working with the DCTF, the fishing industry, NMFS, conservation groups, and whale entanglement experts, to meaningfully address and prevent further entanglements, while developing a plan to more comprehensively address the issue in the long term.

Importantly, while the letter lists potential measures for consideration based on what we found in the literature, it does not prescribe any specific actions to be taken, as we hope to learn more and see those arise through the collaborative dialogue.

Lastly, we think it is important to get the word out to the media/public about this issue in a manner that both describes the urgent nature of the increased entanglements while indicating that collaborative efforts are underway to address the issue. While the issue of whale entanglements has already received substantial media coverage in the last few months, we plan on reaching out to the media next week along these lines.

Again, thank you and the DCTF Executive Committee members for Monday's discussion, and hopefully this update indicates our willingness to work collaboratively on this.

Please forward this note to the DCTF Executive Committee members, and please let us know if you or any DCTF Committee Members have any questions or feedback. We look forward to continued dialogue.

Sincerely,
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