

California Dungeness Crab Task Force
C/o California Ocean Protection Council
1330 Broadway, 13th Floor
Oakland, Ca 94612-2530

January 28, 2010

Re: Proposal by DCTF Processor Representatives to the California Dungeness Crab Task Force: Staged Development Plan

I would like to go on record as being apposed to recommendation #4 of this plan.

Any plan that designates any current “Valid Permit Holder” as defined by the current Cal Fish and Game Code, to a “Latent Permit”, is totally unacceptable. I also question the legality of this part of the proposal. Almost 30% of the current permit holders would have their permits (actually their vessels) instantly devalued by this irresponsible act. Calling any Valid Permit a Latent Permit is wrong as there is no legal written definition of this term.

The Valid Inactive permit holders currently have no designated representative to the DCTF as required by statute. This is also unacceptable. I suggest you stop having proceedings until one is appointed.

No minimum catch requirement has been required since limited entry began, to retain a Cal Dungeness Permit, only annual registration of boat and license fees. To set an arbitrary control date (in the past, not the future) is totally unjust.

A tiered system as used in Oregon and other West coast States may be inevitable, however the “Inactive Permit Holders” should be entitled to the lowest tier at minimum. The minimum should be set at 250 pots so that a person has a reasonable chance to make a living.

You must take into consideration the substantial investment the Inactive Permit holders have in this. Not only have they paid their fees annually but also have the expense of maintaining and mooring their vessels.

All of the Inactive Permit Holders Have lived up to their responsibilities (by definition) in this matter. I urge you to live up to your's. Don't legislate us out of our investments and our futures.

Respectfully,

Mark A. Cole

Cal Dungeness Permit Holder
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