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Via: Email

We are a united group of commercial Dungeness crab fishing businesses, commercial fishing associations, buyer/processors, and industry leaders from Morro Bay, Moss Landing, Santa Cruz, Half Moon Bay, San Francisco, Bodega Bay and Fort Bragg.

We are writing to express extreme concerns with reports that the California Department of Fish and Wildlife may be considering commercial Dungeness crab season opening protocol without due process and adequate input from the industry.

Many of us have been participating directly with the California Department of Fish and Wildlife (CDFW) through the Dungeness Crab Task Force (DCTF) process. We have trusted that this engagement would ensure a well thought out, orderly and safe opening to the commercial Dungeness crab season following the unprecedented closure due to domoic Acid levels this past November.

The Dungeness Crab Task Force Executive Committee (DCTF-EC) has provided written recommendations to the CDFW, California Department of Public Health (CDPH) and the Office of Environmental Health Hazard Assessment (OEHHA) on 11/9/15 and 1/11/16. DCTF-EC calls have been held on 11/5/15, 12/22/15 and 1/28/16.

Recommendations from the DCTF-EC have consistently called for a statewide commercial season opening and clear protocols for fair start provisions and pre-soak rules that would ensure the safety of the public and avoid a panicked “shotgun start” that could put the safety of the fleet at risk.

- From the November 9, 2015 DCTF-EC Guidance memo: *“Once domoic acid levels have fallen below health advisory levels, the DCTF Executive Committee advises that both the recreational and commercial fisheries be opened statewide, rather than by county, district, management area, etc. This would prevent potentially harmful crabs from being accidentally consumed by the unknowing consumer or uninformed sportsman.”*
- From the January 11, 2016 DCTF-EC Guidance Memo: *The Executive Committee is concerned that once the California commercial Dungeness crab fishery reopens, there will be a “race” for crabs creating unsafe and potentially life threatening conditions for fishermen.*

It has been widely understood that if conditions warranted revisiting opening in a manner other than statewide, that opening would be by management district only. We are unanimous in our opposition to arbitrary lines being created within management districts.

Since November 3, 2015, there have been 36 Analytical Data Summaries of domoic acid posted on the CDPH website. These test results have been inconsistent. Some areas have tested clean and then returned to elevated levels at a later date. For example, the Bodega Bay area immediately North of Pt. Reyes was clean on 1/25/16 and returned to elevated levels on 2/6/16. The Point Reyes test area where the recreational

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season just opened was reported over the action level on 12/1/15, and clean on 12/8/15 and 12/17/15. It appears that there has been no testing in that area for over 8 weeks.

Why now is the CDFW willing to deviate from industry accepted opening structures and consider opening commercial Dungeness crab season South of Pt. Reyes which splits a management area, has 8 week old test data, and is less than 15 miles from a elevated test?

We know that recently a small number of fishermen have taken to social media to post CDFW staff phone numbers in an effort to create pressure for opening under different protocols than those that have been subject to coast-wide industry input through the DCTF-EC. We hope that pleas for disaster relief are not being misinterpreted as a demand from industry to open the season under any circumstances, regardless of consequences to the public, the fleet or the industry as a whole.

We, as established multi-generational commercial fishing businesses from up and down the coast, have also suffered extreme financial losses. Regardless of how the season opens, recovery is not possible and disaster relief remains imperative. We all stand ready and willing to go fishing, however, we also understand that opening the season is an extremely complex issue, and not as simple as addressing the short term financial needs of a few fishermen. It is unprecedented to open a season at this time of year, and entirely unknown what impacts heavy fishing pressure at this time in the crab cycle will do to the resource. Smaller areas open to more fishing pressure only increases the complexity and potential for long term consequences for the resource.

We do not believe that it is acceptable to have endured the hardship of this extended delay, and come to the unusual place where the majority of the industry is aligned around the DCTF EC recommendations, only to have the CDFW act without consensus. We believe that anything other than a statewide opening, or management district openings as previously discussed, would create dangerous conditions for public health, the fleet, and add further devastation to the industry and markets that depend on California Dungeness Crabs.

Thank you for your consideration,

Half Moon Bay Seafood Marketing Association

Santa Cruz Commercial Fisherman's Association  
San Francisco Crab Boat Owners Association  
Bodega Bay Fisherman's Marketing Association  
Salmon Trollers Marketing Assoc. (Fort Bragg)

Bill Carvahlo- President, Wild Planet Foods  
Mike Lucas- North Coast Seafood  
Kevin Lee- Nor Cal Seafood  
David Mallory- Morning Star Fisheries

Bill Blue- Morro Bay  
Bob MaHarry- Morro Bay

Steve Fosmark- Moss Landing

Joe Stoops- Santa Cruz  
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Steve Fitz- Half Moon Bay  
Mike McHenry- Half Moon Bay  
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Porter McHenry- Half Moon Bay

Sean Hodges- San Francisco  
John Tarrentino- San Francisco

Joe Mantua- Bodega Bay  
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Stanley Carpenter- Bodega Bay  
Chris Zito- Bodega Bay  
Fred Wedell- Bodega Bay  
Paul Wedell-Bodega Bay  
Blaine Rogers- Bodega Bay  
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