

*Public comment submitted to the California Dungeness Crab Task Force (DCTF) on September 13, 2017*

Currently the DCTF is taking time to debate the permit transferability system the Department of Fish and Wildlife uses for Dungeness crab permits. There are important issues that face the Dungeness crab fishery like whale entanglement, Demoic acid and the constant struggle of successfully marketing our product while permit transferability is not one of them.

The system that has been in place for Dungeness crab permit transfers should stay the way it has always been. The boats that currently do not have assigned lengths should submit current Coast Gaurd Documentation in order for the Department of Fish and Wildlife to update its records. Changing the transferability criteria now could create another class of have and have nots, when it should be, what is good for one is good for all. Keeping the trap limit program is imperative as we deal with the growing opposition of whale entanglement groups. Currently there is no biological need or resource issue that would create the need to change the transferability system. With today's challenges to this fishery being whale entanglements and Demoic acid, doing away with any type of length requirement is actually supported. This would also increase the speed and ease of permit transfers as some have argued is necessary. In conclusion, the trap limit program is vital to the future of our fishery and the permit transferability process should be left as it has always been but if there is a need to change it to increase speed and ease of transferability then throw out the size limit. In short, the DCTF should focus it's time and efforts on critical issues that face the future of our industry not permit transferability.

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