



~California Dungeness Crab Task Force~

<http://www.opc.ca.gov/2009/04/dungeness-crab-task-force/>

November 12, 2024

California Department of Fish and Wildlife
Regulations Unit
Attn: Chelle Temple-King, Sr. Environmental Scientist
P.O. Box 944209
Sacramento CA, 94244-2090

RE: Public Comment for Expanded Retrieval of Lost or Abandoned Commercial Dungeness Crab Traps (Amend Section (§) 132.2, Title 14, California Code of Regulations (CCR))

Dear Ms. Temple-King,

Thank you for the opportunity to comment on the proposed amendments to Section (§) 132.2, Title 14, California Code of Regulations (CCR) to expand the Retrieval of Lost or Abandoned Commercial Dungeness Crab Traps. The California Dungeness Crab Task Force (DCTF) met on October 29-30, 2024, and discussed the draft rulemaking. The DCTF is concerned about the data reporting requirement. Specifically, the DCTF unanimously approved a recommendation that the California Department of Fish and Wildlife (CDFW) streamline the reporting of retrieved gear.

The DCTF was established pursuant to Fish and Game Code Section 8276.4. The DCTF reviews and evaluates Dungeness crab fishery management measures and provides recommendations to the Joint Committee on Fisheries and Aquaculture, CDFW, and the Commission. The DCTF is composed of 27 members, including seventeen (17) members representing commercial fishing interests, two (2) members representing sport fishing interests, two (2) members representing crab processing interests, one (1) member representing Commercial Passenger Fishing Vessel (CPFV) interests, two (2) members representing nongovernmental organization interests, one (1) member from Sea Grant, and two (2) members from CDFW. Additional information about the history of the DCTF is available on the DCTF webpage: <http://www.opc.ca.gov/2009/04/dungeness-crab-task-force/>.

Section § 132.2(a)(2)(D), Title 14, CCR states, "On or before the first day of each month, vessel operators shall report information required by subsection (a)(2)(C) for any traps retrieved during the prior month. Reporting shall be via email or text to LostGear@wildlife.ca.gov, or on an electronic form prescribed by the Department." In the Risk Assessment and Mitigation Program, RAMP, (§ 132.8, Title 14, CCR), commercial Dungeness crab permit holders are required to submit bi-weekly reports regarding their fishing activities. Requiring permit holders to submit multiple reports for the same fishery at varying frequencies and to different recipients is confusing and may impact compliance rates.

The DCTF discussed short-term solutions to address this issue, such as adding a link to the gear retrieval (§132.2) reports in the RAMP (§ 132.8) reports, and they requested CDFW develop a longer-term solution to make the process less cumbersome and reduce confusion within the fleet.

We appreciate the opportunity to respond to CDFW's proposed amendments to § 132.2, Title 14, CCR. The DCTF appreciates the ongoing collaborative relationship with CDFW and looks forward to continuing to work together. Additional information about the DCTF's October 29-30, 2024 meeting, including a summary and final report will be available in the coming weeks at <http://www.opc.ca.gov/2009/04/dungeness-crab-task-force/> or contact Rachelle Fisher at

info@dungenesscrabtaskforce.com or 714-330-7976.

Sincerely,
The California Dungeness Crab Task Force

EC: CA Department of Fish and Wildlife, Charlton Bonham, Director
CA Department of Fish and Wildlife, Craig Shuman, Marine Regional Manager
CA Ocean Protection Council, Jenn Eckerle, Executive Director
California Fish and Game Commission, Samantha Murray, President
Joint Committee on Fisheries and Aquaculture, Mike McGuire, Chair