

April 5, 2017

Dear Director Bonham,

During the past two seasons (2015-16 and 2016-17), the opening of the Dungeness crab fishery has been delayed by elevated levels of domoic acid in crab viscera. Resource managers and public health officials have faced the unprecedented task of protecting public health during these circumstances while attempting to provide for viable commercial and sport fisheries. Existing fishing regulations often lack the clarity needed by managers, resulting in confusion and frustration for industry and consumers alike. A management proposal is being circulated among the commercial fleet that Humboldt Fisherman's Marketing Association (HFMA) supports for Districts 6 & 7. This proposal clearly defines how managers will proceed in the event of domoic acid and other similar incidents. HFMA members feel this proposal will help maintain traditional fishing patterns in the crab fishery. There are three elements to this proposal:

1) In the event of a delayed opening for any reason in the D. crab season in District 6 or 7, these Districts will be considered as one management zone. Any delay will continue until the cause of delay is resolved or until January 15, whichever comes first. Fishing will commence on January 16 in as much area as possible as determined by the Director of the California Department of Fish and Wildlife (CDFW), after consultation with industry representatives. 2) Initially the entire management zone will be afforded effort shift protection for thirty (30) days from any person or vessel that has previously fished D. crab during the current season in any other waters of California, Oregon, or Washington. Furthermore, any area that remains delayed after January 15 will be afforded effort shift protection for thirty (30) days after that area(s) opens. Effort shift protection will expire thirty (30) days after the opening date of fishing in any delayed area(s), respectively. 3) Upon opening of any area, normal preset times will be afforded in advance of any opening date for that area.

Members of HFMA believe this proposal will return normalcy to the fishery when abnormal circumstances arise. This will benefit the vast majority of fishers, processors and consumers alike. Thank you.

Sincerely,

Scott Creps

President, HFMA