

October 25, 2021

Dear Dungeness Crab Task Force Members:

The California commercial Dungeness crab fishery has made great strides in reducing whale and sea turtle entanglements and entanglement risk, and implementing new measures to increase accountability for traps, prevent trap loss, and retrieve lost traps. The fishery should be publicly recognized and praised for these achievements. More can be done to increase accountability and improve estimates of trap loss rates.

We understand the DCTF's legislative recommendation is to increase the maximum servicing interval beyond the current 96 hours. We acknowledge that this change could increase flexibility for the fleet, may increase catch per unit effort, and could improve overall profitability of the fishery.

The recommendation, however, raises the following conservation concerns:

1. May decrease overall accountability to keep track of gear;
2. May increase risk of trap loss, which in turn increases risks of wildlife entanglements; and
3. May increase mortality of catch and bycatch.

To compensate for these increases in conservation risk, we encourage the DCTF to include in the legislative proposal additional measures with objectives to verifiably account for lost gear, increase accountability for traps, and further disincentivize trap loss, at-sea trap "storage", and at-sea trap disposal.

We believe the DCTF has the tools and expertise to develop and propose specific measures to accomplish these objectives in a way that makes sense for the Dungeness crab fishery. We would be available to work with the DCTF to provide input. Examples of management measures for consideration that could help meet these objectives include:

- Electronic monitoring systems that are set up to show where traps are set and retrieved.
- Requirements for each permit holder to periodically return all remaining trap tags to CDFW.
- Performance standards on gear loss rates by vessel, assessed over multiple years. For example, permit holders could be rewarded if they lose fewer than a specified number or percentage of their traps over a multi-year period; or penalized for losing more than a specified number or percentage.
- Fines for each unit of lost gear.
- Allow options for increased service intervals for CDFW-approved alternative gear.
- Changes to service interval depending on RAMP entanglement risk.

Thank you for your history of pro-active conservation accomplishments and we look forward to discussing a path forward.

Sincerely,

Geoff Shester  
Oceana