

Memorandum

Date: May 1, 2020

To: Charlton H. Bonham
Director
Department of Fish and Wildlife

From: Craig Shuman, D. Env
Marine Regional Manager



Subject: **Commercial Dungeness Crab Entanglement Risk Assessment**

On April 27, 2020 the California Dungeness Crab Fishing Gear Working Group (Working Group) met to review available data and provide a recommendation to the Director based on the Risk Assessment and Mitigation Program (RAMP) framework. Based on this review and with additional support from RAMP factor experts, the four RAMP factors were evaluated by the Working Group as follows:

- Entanglement: risk is low
- Ocean conditions and forage: risk is low
- Fishing dynamics: risk is low
- Marine life concentrations:
 - Blue whales: risk is low
 - Leatherback sea turtles: risk is low
 - Humpback whales
 - Northern Management Area (NMA): risk is low (consensus)
 - Central Management Area (CMA): risk is low (majority); risk is moderate (minority); with abstentions

The Working Group also provided an overall risk assessment across all four RAMP factors:

- NMA: overall risk is low (consensus)
- CMA: overall risk is low (majority); overall risk is moderate (minority)

Based on the above risk assessment, the Working Group finalized a recommendation on April 29, 2020 to inform the Director's May 1, 2020 risk determination. Based on the risk assessment, the Working Group did not recommend any mandatory management action by the CDFW Director at this time. The Working Group made a consensus recommendation for fishery participants in both management areas to use best practices, as outlined in their current Best Practices Guide. The Working Group also recommends that CDFW implement the Trap Gear Retrieval Program and encourages industry participation.

Marine Region staff have independently reviewed all available data and the risk assessment factors. Based on this independent analysis, Marine Region agrees with the Working Group's risk assessment for the NMA and does not recommend any additional management measures at this time. Marine Region staff disagree with the low risk assessment for the CMA and continue to support the May 15, 2020 fishery

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closure due to increasing numbers of Humpback whales in that area. The May 15 closure is further supported by the consensus recommendation from the Working group at its April 9 Risk Assessment to allow the fleet four weeks to remove gear due to challenges created by COVID-19 and the oceanographic forecast for strong coastal winds. Given the increasing risk and four-week removal timeframe due to COVID-19, Marine Region continues to support the May 15, 2020 closure.

Marine Region also recommends the Director authorize the Lost or Abandoned Trap Gear Retrieval Program pursuant to Fish and Game Code Section 8276.1(c) and Section 132.7, Title 14, CCR. Marine Region staff, in coordination with Law Enforcement Division, recommend this program be authorized to begin removing lost or abandoned gear on May 22, 2020 at 6:00 a.m. in the CMA.

Staff will continue to monitor all available data sources, which includes conducting aerial surveys prior to convening the Working Group for the next risk assessment on May 11, 2020.

Attachments:

- RAMP Working Group – Management Recommendation – 04/29/2020
- RAMP Available Data – Risk Assessment – 04/27/2020
- Director’s Lost/Abandoned Gear Retrieval Declaration – 05/01/2020

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