

## Memorandum

Date: May 29, 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 May 26, 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 its 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:

- Ocean conditions and forage: risk remains low
- Entanglement:
  - risk is moderate in the Central Management Area (CMA) for districts 10 and 17
  - risk remains low in CMA fishing districts 18 and 19 and the Northern Management Area (NMA) for fishing districts 6-9
- Fishing dynamics: risk is low
- Marine life concentrations:
  - risk remains low for humpback whales, blue whales, and leatherback sea turtles in the NMA
  - risk is elevated for humpback whales in fishing district 10; the group was unable to reach a determination for the risk of humpback whales in the remainder of the CMA
  - risk remains low for blue whales and leatherback sea turtles in the CMA

The Working Group also provided an overall risk assessment across all four RAMP factors as low for humpback whales, blue whales, and leatherback sea turtles in both the CMA and NMA.

Based on the above risk assessment, the Working Group finalized a recommendation on May 28, 2020 to inform the Director's June 1, 2020 risk determination. Based on the risk assessment, the Working Group did not recommend any mandatory management action by the Director at this time.

The Working Group recommends the fleet use best practices for the remainder of the season in the NMA, as outlined in their current Best Practices Guide. The Working Group also encourages industry participation in the post-season Trap Gear Retrieval Program to reduce entanglement risk from lost or abandoned commercial Dungeness crab fishing gear in the CMA. The Working Group requests commercial and

recreational ocean users report locations of lost or abandoned commercial Dungeness crab gear to CDFW to further facilitate retrieval.

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 also agrees with the overall low risk assessment for the CMA because the season closed on May 15 but notes there is moderate entanglement risk due the presence of lost or abandoned trap gear in the CMA. As a result, Marine Region supports the voluntary management recommendations put forward by the Working Group to use best practices and encourages reporting of lost or abandoned gear so that it can be removed.

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 June 9, 2020.

**Attachments:**

- RAMP Working Group – Management Recommendation – 05/28/2020
- RAMP Available Data – Risk Assessment – 05/22/2020

cc: Wendy Bogdan, General Counsel  
Office of the General Counsel  
[Wendy.Bogdan@wildlife.ca.gov](mailto:Wendy.Bogdan@wildlife.ca.gov)

David Bess, Chief  
Law Enforcement Division  
[David.Bess@wildlife.ca.gov](mailto:David.Bess@wildlife.ca.gov)

Mike Stefanak, Assistant Chief  
Law Enforcement Division  
[Mike.Stefanak@wildlife.ca.gov](mailto:Mike.Stefanak@wildlife.ca.gov)

Sonke Mastrup, Program Manager  
Marine Region  
[Sonke.Mastrup@wildlife.ca.gov](mailto:Sonke.Mastrup@wildlife.ca.gov)

Mary Loum, Attorney  
Office of the General Counsel  
[Mary.Loum@wildlife.ca.gov](mailto:Mary.Loum@wildlife.ca.gov)

Robert Puccinelli, Captain  
Law Enforcement Division  
[Robert.Puccinelli@wildlife.ca.gov](mailto:Robert.Puccinelli@wildlife.ca.gov)

Ryan Bartling, Senior Environmental Scientist  
Marine Region  
[Ryan.Bartling@wildlife.ca.gov](mailto:Ryan.Bartling@wildlife.ca.gov)