


Memorandum

Date: June 15, 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 June 9, 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 and Forage Conditions**
 - Risk is low in the Northern Management Area (NMA)
 - Risk is low in the Central Management Area (CMA; majority); risk is moderate in the CMA (minority)
- **Entanglement**
 - Risk is low in the NMA
 - Risk is low in the CMA (majority); risk is moderate in CMA fishing districts 10 and 17 and low in fishing districts 18 and 19 (minority)
- **Marine Life Concentrations:**
 - Risk is low in the NMA for humpback whales, blue whales, and leatherback sea turtles
 - The Working Group was unable to make a determination of risk based on marine life concentrations for the CMA.
- **Fishing Dynamics:**
 - Risk is low for both the NMA and CMA

The Working Group's overall assessment of risk across all four RAMP factors was low for both management areas.

Based on the above risk assessment, the Working Group finalized a recommendation on June 12, 2020 to inform the Director's June 15, 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 has closed 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 if conditions allow prior to convening the Working Group for the next Risk Assessment on June 26, 2020.

Attachments:

- RAMP Working Group – Management Recommendation – 06/12/2020
- RAMP Available Data – Risk Assessment – 06/09/2020

cc: Wendy Bogdan, General Counsel
Office of the General Counsel
Wendy.Bogdan@wildlife.ca.gov

David Bess, Chief
Law Enforcement Division
David.Bess@wildlife.ca.gov

Mike Stefanak, Assistant Chief
Law Enforcement Division
Mike.Stefanak@wildlife.ca.gov

Sonke Mastrup, Program Manager
Marine Region
Sonke.Mastrup@wildlife.ca.gov

Mary Loum, Attorney
Office of the General Counsel
Mary.Loum@wildlife.ca.gov

Robert Puccinelli, Captain
Law Enforcement Division
Robert.Puccinelli@wildlife.ca.gov

Ryan Bartling, Senior Environmental Scientist
Marine Region
Ryan.Bartling@wildlife.ca.gov