



Coastside Fishing Club

P.O. Box 5928
Napa, CA 94581

May 2, 2014

BY EMAIL: fgc@fgc.ca.gov

President Michael Sutton
California Fish and Game Commission
1416 Ninth Street, Suite 1320
Sacramento, CA 95814

Re: Renewed Petition for Changes in Dungeness Crab Regulations

Dear President Sutton:

In 2013, Coastside Fishing Club petitioned the Commission to make certain changes to regulations governing the recreational take of Dungeness crab. This was discussed at the Commission's November and December meetings. The Department persuaded the Commission that Coastside's requests ought to be vetted before the Dungeness Crab Task Force (DCTF), a body comprised almost exclusively of commercial crabbing interests.

The DCTF met in April, voted on Coastside's proposed changes, and unanimously adopted the following language:

- Per the Commission's direction, the DCTF has discussed the Coastside Fishing Club proposal. The DCTF feels strongly that these issues need to be vetted through and decided on by the Commission with input from CDFW and members of the sport fleet.

The DCTF also voted unanimously that the current two-tiered recreational bag limits and minimum sizes should end:

- The DCTF agrees that there should be a uniform bag limit and minimum size for the sport fishery throughout California. However, the details of this should be decided on by the Commission with input from CDFW and the sport fleet.

Accordingly, Coastside renews its petition to the Commission to revise regulations governing the recreational take of Dungeness crab. However, in order to simplify the task before the Department and Commission, Coastside is willing to defer certain items in its 2013 petition:

Change Request in Original Petition	Comment
1. Prohibit retention of females	May be deferred. The Department stated at the DCTF meeting that it does not believe that eliminating recreational take of females would appreciably benefit the resource. Few are now taken in the sport fishery and a new prohibition would create enforcement issues. Angler education may be the preferred approach.
2. Require use of "rotten cotton" on traps	May be deferred. The Department stated at the DCTF meeting that it does not believe that requiring escape devices would appreciably benefit the resource. A new prohibition would create enforcement issues. Angler education may be preferred approach.
3. Require that pots be labeled with the owner's name and contact information	May be deferred. While the Department stated that it generally agrees with the need to label pots and/or buoys, there was disagreement with Coastside's specific approach. Additional discussions are needed between the Department and stakeholders.
4. Prohibit pulling pots (not your own) without the owner's written permission.	Already in regulations per the Department.
5. Conforming the 10-crab limit to all sport anglers.	Requires Commission action

6. Conforming the 5.75" **Requires Commission action**
minimum size
throughout the
recreational fishery.

In order for these changes to be considered on this year's regulatory calendar, and therefore be effective for the November 2015 Dungeness crab season, Coastside understands that they must be placed on the Commission's June agenda. The changes to regulatory language are minimal, requiring only the striking of unfair language previously added to create a two-tiered regulatory structure. The deleted language never served any resource conservation goal, only acting to penalize recreational anglers in the six-county area without their own boats.

~~14 CCR Section 29.85 (a)(3) Limit: Ten, except in Sonoma, Marin, San Francisco, San Mateo, Santa Cruz, and Monterey counties, when fishing aboard a commercial passenger fishing vessel required to be licensed pursuant to Section 7881 and/or Section 7920, Fish and Game Code, the limit is six.~~

~~14 CCR Section 29.85 (a)(7) Minimum size: Five and three-quarter inches measured by the shortest distance through the body from edge of shell to edge of shell directly in front of and excluding the points (lateral spines); except in Sonoma, Marin, San Francisco, San Mateo, Santa Cruz, and Monterey counties, when fishing aboard a commercial passenger fishing vessel required to be licensed pursuant to Section 7881 and/or Section 7920, Fish and Game Code, the minimum size is six inches measured by the shortest distance through the body from edge of shell to edge of shell directly in front of and excluding the points (lateral spines).~~

The Department estimates recreational exploitation of the Dungeness crab resource at 2% or less. The resource is healthy with commercial exploitation not limited by total allowable catch. The requested changes will allow recreational license holders on party boats from Sonoma County south to enjoy the Dungeness crab resource in the same measure as those on party boats above Sonoma County or on private boats throughout the State. Coastside previously reached out to the Department on April 24, but has not yet received a response. See April 24, 2014 letter to Director Bonham, attached to this letter.

As requested by the Department, Coastside's proposal has been publicly vetted by the DCTF, which reached a unanimous conclusion. Providing a single, statewide recreational bag limit and minimum size cannot be the subject of genuine controversy. The removal of this unfair language is long overdue and should not be delayed further.

Very truly yours,

A handwritten signature in black ink that reads "Marc Gorelnik". The signature is written in a cursive, flowing style.

Marc Gorelnik, Coastside Fishing Club

Attachment: Coastside's April 24, 2014 letter to Director Bonham

cc: Commissioner Jack Baylis
Commissioner Jim Kellogg
Commissioner Richard Rogers
Commissioner Jacque Hostler-Carmesin
Executive Director Sonke Mastrup (via email: Sonke.Mastrup@fgc.ca.gov)



Coastside Fishing Club

P.O. Box 5928
Napa, CA 94581

April 24, 2014

VIA HAND DELIVERY

Mr. Charlton H. Bonham
Director
California Department of Fish and Wildlife
1416 Ninth Street , 12th Floor
Sacramento, CA 95814

Re: Action Needed to Place Sport Crab Regulations on Commission's June Calendar

Dear Director Bonham:

In 2013, the Coastside Fishing Club petitioned the California Fish and Game Commission to revise regulations for the recreational take of Dungeness crab. The Department persuaded the Commission that the proposed changes needed to be run through the Dungeness Crab Task Force (DCTF). The DCTF has 23 voting members, almost entirely from the commercial crabbing industry. There are two representatives of recreational license holders. Department staff and others serve as non-voting members and advisors.

At its meeting held April 22 and 23, 2014, the DCTF voted unanimously to return Coastside's proposal to the Commission:

- Per the Commission's direction, the DCTF has discussed the Coastside Fishing Club proposal. The DCTF feels strongly that these issues need to be vetted through and decided on by the Commission with input from CDFW and members of the sport fleet.

The DCTF also voted unanimously that the current two-tiered recreational bag limits and minimum sizes should end:

- The DCTF agrees that there should be a uniform bag limit and minimum size for the sport fishery throughout California. However, the details of this should be decided on by the Commission with input from CDFW and the sport fleet.

Currently, there is a different and more restrictive bag limit and minimum size applied to anglers on a commercial passenger fishing vessel (CPFV) from Sonoma to Monterey Counties. These restrictions do not apply to CPFVs north of Sonoma County or to private boaters statewide. There is no resource protection issue whatsoever to justify these varying regulations, which should be eliminated.

Coastside understands that the Commission is prepared to take action on Coastside's proposal provided, however, that the Department requests the matter be placed on the agenda for the Commission's June meeting. This would permit the proposal to be included on the regulatory calendar in August.

Even if the Department and Commission timely act on Coastside's proposal, it will be over a year, November 2015, until the changes take effect. Delaying action, however, would further delay the changes to November 2016 or later.

Coastside Fishing Club thanks the Department for its efforts at the DCTF. We look forward to seeing this matter placed on the Commission's June agenda.

Respectfully submitted,



Marc Gorelnik
Coastside Fishing Club
gorelnik@gmail.com

cc: California Fish and Game Commission