



Coastside Fishing Club

P.O. Box 5501
San Mateo, CA 94402

November 3, 2015

VIA EMAIL: fgc@fgc.ca.gov

Jack Baylis, President
California Fish and Game Commission
1416 Ninth Street, Suite 1320
Sacramento, CA 95814

SUBJECT: Emergency Action to Delay Sport Crab Opener

Dear President Baylis:

The Coastside Fishing Club supports measures necessary to protect the public health, including a delay in the opening of the recreational Dungeness crab season from the scheduled date of November 7, 2015. The season should open once public health officials determine that domoic acid levels in crabs have dropped to safe levels.

Coastside respectfully asks that the Commission carefully consider how the eventual opening of the sport season will proceed, particularly in relation to the likely delayed opening of the commercial season. The sport and commercial openers are intentionally staggered in regulations in order to provide recreational anglers a fair opportunity to take crab before nearly all harvestable crabs are taken by commercial crabbers.

Depending on the calendar and the region, sport crabbers generally have anywhere from a week to a month before commercial crabbing commences.

- Sport crab opens statewide on the first Saturday in November
- Commercial crab opens from Sonoma County south no earlier than November 15
- Commercial crab opens north of Sonoma County no earlier than December 1

As the Commission is aware, its powers are restricted to recreational crabbing while the Legislature has empowered the Department to manage the commercial industry. Coastside respectfully asks the Commission take these realities into account in adopting the emergency regulations that will delay the sport crab opener.

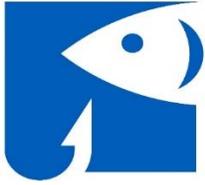
The eventual opening of the sport crab season should be tied to and precede by one to four weeks the commercial gear-setting period that effectively marks the opening of the commercial crab season. In order to avoid unnecessary delay, the sport opening should occur without the need for further Commission action, perhaps by incorporating specific direction to the Director in the emergency regulations.

Respectfully submitted.

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

Marc Gorelnik
Coastside Fishing Club

cc: Chuck Bonham, Director, California Department of Fish and Wildlife



Humboldt Area Saltwater Anglers Inc.

P.O. Box 6191, Eureka, CA 95502

Email: hasa6191@gmail.com

FEIN #61-1575751

November 4, 2015

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

RE: Proposed emergency regulation to close recreational Dungeness crab fisheries

Dear President Sutton and Commission Members:

The Humboldt Area Saltwater Anglers, Inc. (HASA) is a northern California sportfishing organization representing saltwater anglers since 2008. We have been actively engaged in saltwater sportfish management over the years, including recreational fishing for Dungeness crab. We understand the need for the emergency closure of the Dungeness crab fishery, and understand the importance of this fishery to both recreational and commercial fishermen. The historic season structure has provided at least two weeks of lead time between the recreational fishery opening and commercial season opening to give the recreational anglers opportunities before the commercial season starts (when recreational fishing success drops dramatically). If and when the Dungeness crab fishery re-opens for 2015, we request that the regulations continue to provide the recreational crab fishery to open at least two weeks prior to the commercial crab fishery to enable good recreational access to Dungeness crab..

HASA appreciates the Commissions consideration of our request on the emergency regulation change.

Respectfully submitted,

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

Scott McBain, President
Humboldt Area Saltwater Anglers, Inc.

From: [REDACTED]
To: [FGC](#)
Cc: [REDACTED]
Subject: Recreational closure for crab
Date: Wednesday, November 04, 2015 10:34:47 AM

Dear Commissioners, the possible pending closure of recreational crab season I hope will be based of factual information. The notice from the Fish and Wildlife about the Domoic Acid found in the meat and viscera of the crab does not reflect the studies of Domoic Acid as found in the Natural Marine Toxins: PSP and Domoic Acid literature. It states: . [Unsafe levels of domoic acid have been found in mussels, oysters, razor clams and the viscera \(but not in the muscle tissue\) of sardines, anchovies, crab and lobster. Many other species have yet to be investigated.](#)

This contradicts what the bulletin says and which decisions will be decided from. Closing the recreational season of crabbing would be a disappointment to a lot of the public that look forward to this week. Especially with the opening of commercial season right after. I understand people eat crab in a lot of different ways. We prefer cleaning and then steaming the meat. This method I personally feel would be the safest given that the statement above indicates it hasn't been found in the meat. That's my personal assumption.

I hope your decisions will be based on facts and **not misinformation.**

Regards, Rick Gerlack

From: sanjit kumar [REDACTED]
Sent: Wednesday, November 04, 2015 2:49 PM
To: FGC
Subject: Comments: California Dungeness Crab Domoic Acid Emergency Meeting

F&G Commissioners:

I have a some brief comments related to the CDPH recommendation regarding closing the Crab fishery. For context I am a recreational Dungeness crab fisherman in Monterey Bay.

Two vicera (gut) samples were collected from Dungeness crab on 9/16/15 one result was 6.8 ppm and the other 74ppm. The FDA limit for domoic acid is 30 ppm.

Comments:

- Only TWO Dungeness crab were sampled to represent Monterey Bay, which covers about 450 square miles.
- No crab meat samples were collected, only the guts were sampled which accumulate domoic acid.
- Most people do not eat crab guts
- The samples were collected 50 days ago- with pending data from Oct/Nov. not released.

Recommendations:

-collect crab meat samples. If they are less than 20ppm do not close the fishery even if the gut samples exceeds 30 ppm, instead issue an advisory to not consume crab vicera/guts. It should be noted that crab meat samples that have detections of domoic acid have likely been contaminated by the vicera and have not accumulated domoic acid.

-if the crab fishery closes please keep the one week stagger between the reopening of the recreational season and commercial season.

thanks for your time

Sincerely
Sanjit Kumar
Santa Cruz