Exhibit (C)

Public Correspondence received as of August 10, 2020
July 29, 2019

Kurt Melcher  
Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Way  
Salem, Oregon 97302-1142

Re: Temporary rule change pertaining to crab pot removal

This letter is in regards to the temporary rule change for commercial crab permit holders eliminating the 2 week “cleanup period” requiring fishermen to have all their gear removed by August 14th instead of being allowed the following two weeks for removal.

I have a 200 pot permit and fish a 22’ dory off the beach in Pacific City. There are limited days and times during those days that a dory can safely launch and land through the surf. Due to the limited capacity (6-10 pots), there have been years where I have used most of the 2 week period to remove my gear. By requiring to have the gear out by the 14th I will need to start pulling gear on the 1st of August thereby effectively reducing my season by 2 weeks. This will essentially eliminate my Labor Day market which in years past has been a lifesaver for my business.

This January there were thousands of pots between Cape Kiwanda and Cascade Head to the point that it was difficult to find a place to set gear. As of today there are less than 200 commercial pots in that same area. I have heard that there has been only one whale entanglement in Oregon and that was in January.

This rule change is unfair and has the potential of devastating economic impacts on the smallest of vessels with the least impact on the resource.

I would ask that vessels under 26’ would be exempted from this rule until it can reviewed and the impacts on the small boat fleet can be fairly assessed.

Respectfully,

Craig Wenrick  
F/V Sea Q  
Sea Q Fish Ltd  
Pacific City, Oregon

Cc: Oregon Crab Commission  
Caren Braby  
Senator Roblan  
Senator Johnson  
Representative Gomberg  
Commissioner Yamamoto
Hello Caren, Kelly and Troy

First of all wanted to thank you guys for taking the time to go through this process with the fleet. I can see how difficult it is to deal with everyone in such a format but it does bring a lot to the surface.

I am sorry I was unable to attend the Brookings meeting as I wanted to talk to you more about what steps we are going to have to take. I thought a lot about it and I have come to the idea that from a Port Orford fleet standpoint our biggest restriction would be to not fish at all during the months of April onward.

Economically our small boat fleet needs to keep fishing through the spring/summer months which we would still be able to do with a pot reduction. I think there are only two 500 trap permits left here, one being my brothers, but other than them, a 30% reduction (or a 150/200/350 maybe?) would still give us enough gear to work during that time and still make money. It wouldn't complicate things with dual permits etc. and would still give a chance to future fishermen who might want to get into the business.

I am not speaking for my brother or maybe even myself as a captain but just as someone trying to find a reasonable solution. I have never worked on a large boat and I don't really know how any of this would pencil out for them. I cant speak for the other ports fleets either, but I would hope that the smaller boats in those fleets would want to keep working all season long as well. It just seems like the larger boats could take one for the team and allow all of us to keep working.

One point I would want to make sure is addressed is some sort of exemption or leniency for the 26' boats as they already have a hard enough time stacking and transporting gear. They cannot grow any larger and those permits are pretty much stuck, so in the name of safety they need some sort of break. If it was a bad weather spring I don't think those guys could even get out to stack anything and they shouldn't get punished even if they want to comply. Maybe Kelly could crunch some numbers on how many of those permits exist and how many are active and contributing pots the total number in the water.

Good luck with the other meetings up north. Feel free to contact me if you want any other feedback.

Thanks again,
Aaron Ashdown
F/V Misty
Hi my name is Joel Purkey i am a commercial crabber /fisherman from portorford Oregon a small fishing town on southern Oregon coast i am writing with my concerns regarding the proposal for gear reduction across the board i am aware that the stance is to equally reduce gear across the fleet in the summer months when whales most active i would like to suggest mine and others feelings on this and we believe if reducing the crab pots that every permit be reduced equally 50 percent meaning 500pots to250 300pot permit to 150 and 200 pot permit to 100 the allocation should be based on a tier from our past landings witch our pot allocation were originally based on i feel and alot of others that a 200 pot permit that has showed little participation in the past that is why its a 200 instead of500 pot permit should not get the same amount of gear it basically sets a standard to devalue my buisness as a whole i have a 500 pot permit with average value around 250 thousand dollers to purchase and participate and a 200 pot is about a third of that value buy equally distributed the gear for a summer fishery raises the value of 200 pot guys and devalues the 500 pot permits and the guys who have most invested in fisheries it leaves the ones who have invested the most and are paying boat payments and permit payments almost impossible to stay in buisness if the means of with how i support myself and my family and crew and all the workers associated with just my one buisness it also scares me in the sense that by such drastic rules being adopted it virtually eliminates any new intrants into our very productive dungenes crab fisheries that supports so many buisnesss in Oregon. Concerned crabber family man Native Oregonian Joel Purkey Fishing vessal AliceFaye
Jim,

As the ODFW Newport staff begins the process of developing the 2020 bottom fishing regulations for Oregon, I have been paying close attention to the 2019 harvest, and potential regulations for 2020.

As you may recall, I commented at the 2019 meeting in Salem requesting the commission consider a higher limit for rockfish with a sub bag limit to prevent over-harvest of black rockfish. The commission went along with the ODFW staff recommendations.

For the second year in a row, Oregon is on pace to be substantially below the black rockfish allowable catch. In 2018, anglers only harvested two-thirds of the allowable catch of black rockfish. This year, to date, anglers have only harvested 75-percent of the black rockfish allowable catch. The catch of blue rockfish and canary rockfish, meanwhile is less than 50-percent of the allocation by the PFMC.

Sub bag limits are an effective management tool to maximize fishing opportunity and still stay within the allocation. If Oregon had a total rockfish bag limit of six or seven, with a sub-bag limit of five black rockfish, we would still be within our allocation.

From a private angler perspective, driving to the coast to catch six or seven rockfish is more appealing than just five fish. For the charter industry, an important part of the coastal economy of Oregon, a higher limit makes trips more marketable, which will become more difficult in 2020 with another increase in fishing license fees, especially the daily license fee.

I urge you to ask ODFW in Newport why a sub-bag limit of black rockfish is not being presented to the commission as an effective means of maximizing angler opportunity and give sport anglers the maximum benefit of increase sport fishing license fees.

Here is an update on the YTD harvest. Black, blue and canary rockfish make up the biggest portion of the sport catch, and are what anglers seek when coming to the coast to fish. [https://www.dfw.state.or.us/MRP/finfish/groundfish_sport/estimates/docs/quota_used.pdf](https://www.dfw.state.or.us/MRP/finfish/groundfish_sport/estimates/docs/quota_used.pdf)

Thank you for your time,

Andy

Capt. Andy Martin
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Good day, Caren, Troy and Rep Smith.
My apologies, but I had to leave the Coos bay meeting at 3pm.
I did not get an opportunity to offer my opinion, and would like to do that now.
I prefer the summer endorsed fishery, but oppose bringing gear in for the month of April.
Tags can be swapped out, and endorsed permit participants would be on the grounds to retrieve lost or derive gear.
Ocean Acidification is also a huge issue, and this requirement would only add to fossil fuel emissions.
This approach would absolutely guarantee that effort would not increase, while affording those dependent on the resource the opportunity to continue.
This is by far, the least intrusive, and could prove adequate.
From there, if needed, more drastic measures could be explored.
I would also like to recommend a more robust enforcement approach on the two week gear tending requirement.
This can be done in many ways.
I think that monthly sections
can be added to existing buoy tags, and the month could be “punched out” like you card from your favorite espresso stand.
Monthly would be better than nothing. Any tag not punched, could be subject to pit seizure.

Thanks for all you do.
I genuinely believe we are all on the same page here.

Brett Webb.

Sent from my iPhone
All
I know you are all very busy, so I will be brief.
I recommend sending “ballots” to permit owners, now that we have all been fully informed, and had some time to think any new information through..
I myself have changed my mind on some minor details and can only imagine others have too.
It would give you time to reboot as well.
One vote per permit.
This is the only equitable method.
Put a deadline on poll submissions.
Two weeks.
You could then see the more matured, well informed opinions.
These meetings, while a great tool, are not all inclusive in my opinion.
I am an example of someone who couldn’t stay to submit my opinion or engage in the discussion for the meetings duration..

Ports and cities should be consulted.

I pray that this is looked at holistically.
An April closure would surely decimate the nearshore fishery, which would crush the open access cod as well.
A city like Port Orford, could be absolutely decimated if the three fisheries mentioned are closed.

Thank you for your consideration.
Brett Webb
541 366 1888
To whom it concerns,

My name is Kenny Bushnell and I was in attendance at the Astoria Meeting at the Holiday Inn.

Since then, I have not only realized how much I appreciate your work and protection of the commercial crabbing fleet, but I have been thinking about appropriate measures that could be taken.

I believe that both large and smaller crab boats must be treated on an equal playing field. We all have investments, and in fact a smaller boat, dollar for dollar has a greater investment. This morning, in lieu of the news, I attempted to cancel a large order of new crab pots, but was mostly unsuccessful. Now, I'll have to pay for something I most probably can't use this year.

I propose that we all have a 200 pot limit, both small and larger vessels. Also, and I don't believe this was brought up, we could all get a limit of 50 crab RINGS since these have a shorter soak time, and could be removed from the water, each trip. They would be completely removed from the water every day. The harder you work, the more you get out of it.

We would also suggest a buy back of each pot or permit. This could be funded by conservation groups that wish to help save the whales, or by adding a tax to each pot. Suggested $1000 per pot.

In closure, again I would like to express my appreciation for ODFW shielding us from the Feds. You are doing a great job and we appreciate it so much!

Thank you,

Kenny Bushnell
Kbush Inc.

503-338-9215

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Jennie Logsdon Martin L.O.F.
Licensed Oregon Fisher
Sent from on the river
Oct. 28, 2019

Attention: Caren Bradby, Troy Buell, Kelly Corbett

RE: Whale entanglement prevention in the Dungeness Crab fishery

I have reviewed the target implementation for April and May, 2020 and the possible alternatives for consideration. As a participant in the commercial crab fishery in Oregon, Washington, and Alaska for the past 45 years it becomes very apparent that the input by the fishers who have other fisheries to participate in or who chose not to fish past April 1 have had an overwhelming influence on the proposed regulations.

These proposed plans have minimal realistic hope of reducing or preventing entanglement, and place an undue burden in reducing the fishing season for fishers whose mainstay is the crab fishery. It allows those who move on to other fisheries to complete their desired length of season with a complete complement of gear. Much of this gear is deeper water gear with longer lines and multiple buoys that pose a greater risk of whale entanglement. The danger of entanglement possibly increasing by twenty fold with 3 buoys and 600 feet of line compared to single buoys with 15 fathoms (90 feet) of line. This gear on shorter lines poses less risk to migratory whales, especially the endangered humpback, as it is fished primarily inside of migratory routes. In my 45 years of fishing I have never had an encounter with a humpback whale when fishing Dungeness crab gear in shallow water.

Decreasing the gear limit by 30% after April 1 makes it very difficult to sustain a financially viable fishery. This will result in some of the fishers dependent on the late season harvest being unable to survive financially.

I believe that all commercial crab fishers have an equal responsibility to protect the whales and should share equally in the financial burden. Therefore I recommend temporary reduction of 10% in gear starting from opening day of the season for all fishers. This would more equally distribute the burden and still allow primary harvest of the bulk of the resource during the usual time frame.

I am submitting this recommendation in light of my experience and observations during 45 years of participating in this fishery in three states.

Sincerely,

Al Gann

President Gann Fisheries Inc.
Thanks for having the call today. After much consideration and thought during the last couple years, I support eliminating the 2 week grace period. Eliminating the replacement tags. And a 30 percent reduction in pots starting May 1. If ODFW staff moves ahead with a 20 percent reduction on May 1 I will support that as well. Thank you all for your hard work on this.

Best Justin

I wanted to add to my previous email that I am in support of the 30 fathom depth restriction starting May 1. This will go a long way with reduced entertainment and less gear loss due to conflict with other fisheries. Thanks again you guys have been working hard.

Best Justin
Re: Reducing the Risk of Whale entanglement in Commercial Crab Fishing Gear
Opposition to one element of phase II entanglement mitigation regulatory package

Dear ODFW Commission Members:

The Oregon Coast Crab Association (OCCA) is non-profit 501c6 trade association that was established in May 2019, and currently represents over 30 active Oregon-based Dungeness crab fishermen. The volunteer fishermen organizing the OCCA have been in touch with crabbers in Oregon, Washington and California, processors, ODFW, and elected state officials. We have held and attended numerous meetings, worked on gaining shoreside donations and funding, we are working on an economic impact report to show the importance of our fishery, and we have been monitoring the issues along the entire west coast.

We write today to address serious concerns with one element of the phase II whale entanglement mitigation regulatory package. Specifically, we are strongly opposed to the May 1 start date for the late-season reduction of pot limits by 20%. We would like to offer some background as well as a counter-proposal that will allow us to continue to productively contribute to our shared dual goal of ensuring thriving marine biodiversity and a thriving Oregon commercial Dungeness crab fishery.

Fortunately, humpback abundance trends off California and Oregon are moving in an upward trajectory. The graph above which was presented by Cascadia Research Collective at a crab industry workshop last Fall indicates that humpback whale populations have increased by 80% since 2013, and over 220% since 1998. This illustrates the fact that while humpback entanglements in crab gear do occur to a small degree, it is not happening at a level that jeopardizes the whales ability to
continue to increase in population size year after year. Status quo management of the Dungeness crab fishery has coexisted with increasing whale populations for decades. Our fishery has never exceeded the Potential Biological Removal (PBR) for humpback whales. In other words, status quo management of the Dungeness crab fishery does not pose a threat to ensuring thriving marine biodiversity off Oregon’s coast.

We applaud and strongly support the new temporary rules effective July 1st, 2020. Specifically, we believe that the required taut lines best practice combined with increasing the amount of derelict gear that may be retrieved from August 15th through August 29th should result in significantly reduced entanglements and entanglement risk. These are pragmatic, common sense solutions to mitigate entanglement risk that do not threaten the ability to ensure a thriving Oregon commercial Dungeness crab fishery.

However, the May 1 start date for the late-season reduction of pot limits by 20% does indeed threaten the ability to ensure a thriving Oregon commercial Dungeness crab fishery. While we recognize that the vast majority of crab is caught during the first 8 weeks of the season, we also recognize how critical the May fishery is to participants in the crab fishery that do not have other options available such as switching over to shrimp or other fisheries. Furthermore, applying a depth restriction in May would have detrimental effects on crab catch rates that would have negative cascading impacts to livelihoods and our coastal communities. This was said loud and clear by our members and other Oregon crab fishermen at the ODFW-hosted crab industry meetings that were conducted last fall, as well as during the Oregon Dungeness Crab Advisory meetings about whale entanglement mitigation.

Below we offer two industry alternatives for the Commissions consideration:

**Alternative 1 (preferred):**
- Late-season reduction of pot limits by 20%, effective June 1, 2021
  - a. Require late-season buoy tag in addition to primary season tag
  - b. Late-season 30 fathom depth restriction in combination with pot limit reduction
  - c. Sunset after three seasons for late season pot limit reduction, buoy tag and depth restriction to allow for evaluation

**Alternative 2:**
- Late-season reduction of pot limits by 20%, effective June 1, 2021 unless there is a confirmed entanglement in commercial Oregon Dungeness crab gear in-season, at which time the reduction of pot limits by 20% would begin May 1, 2021
  - a. Require late-season buoy tag in addition to primary season tag
  - b. Late-season 30 fathom depth restriction in combination with pot limit reduction
  - c. Sunset after three seasons for late season pot limit reduction, buoy tag and depth restriction to allow for evaluation

Alternative 1 is our preferred alternative because as we mentioned above, whale populations are steadily increasing, and the taut lines best practice requirement combined with increasing the amount of derelict gear that may be retrieved from August 15th through August 29th to an unlimited...
amount of gear will result in significantly reduced entanglements and entanglement risk. Therefore, a May 1 start date of the 20% pot reduction is a solution in search of a problem that will result in negative unintended consequences to our fishery and to our communities.

We offered a second alternative that allows for more adaptive management approach to where the May 1 start date of the 20% pot reduction would only be triggered if there is a confirmed entanglement with commercial Oregon Dungeness crab gear in-season. If there is zero in-season entanglements, the pot reduction and inherent depth restriction would not start until June 1.

We thank the Commission for the opportunity to provide additional alternatives for you to consider that, in our opinion, do a better job at threading the needle of achieving our shared dual goal of ensuring thriving marine biodiversity and a thriving Oregon commercial Dungeness crab fishery.

Thank you for your attention and consideration.

Sincerely,

Joseph Conchelos
President
Oregon Coast Crab Association

Clint Funderberg
Vice President
Oregon Coast Crab Association