

**KINGSLEY Lisa M \* ODFW**

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**From:** Jerry Marmon <jerrymarmon@gmail.com>  
**Sent:** Monday, September 20, 2021 2:19 PM  
**To:** COMMISSION ODFW \* ODFW  
**Subject:** Dungeness Crab Fishery Management Plan comments

I will preface any comment(s) below with a gratitude of ODFW for providing an open commenting forum for the general public. This being said, I find this management plan to be far too long, complicated, and involved to create a real benefit of anyone to review with any valuable outcome. At 173 pages that contain official definitions, acronyms, data, biology, and charts in addition to an actual management plan for (3) fisheries, I don't think anyone of a regular volition could provide a comment beyond what I'm providing, without taking several days or weeks to dedicate to this. In a brief review, it also appears to be fairly lopsided for a recreational fisherman like myself to make any sort of a comment when over 95% of the Dungeness fishery is commercial. It would be nice to perhaps separate out Recreational from Commercial and perhaps provide a much more summarized and effective Plan for us to comment on otherwise it's a waste of our and ODFW's time.

Thank you

**From:** Jethro Higgins <[jethrohiggins@gmail.com](mailto:jethrohiggins@gmail.com)>

**Sent:** Monday, September 20, 2021 2:42 PM

**To:** [odfw@public.govdelivery.com](mailto:odfw@public.govdelivery.com); RUMRILL Steven S \* ODFW <[Steven.S.RUMRILL@odfw.oregon.gov](mailto:Steven.S.RUMRILL@odfw.oregon.gov)>

**Subject:** Re: Dungeness Crab Fishery Announcement

Any plan this detailed is almost certain to do a bad job of its stated goals. This is overkill. Everything the ODFW does is over the top complicated, and it rarely pans out to be of benefit to animal populations. Classic example is making it illegal to hunt cougar with dogs, and now every species of game is suffering and so are human predators. Salmon suffer for the same reason seal/sea lion protection. The rules governing crab harvest should be able to fit on a 3x5 notecard. Anything more is an ineffective waste of resources and money. This bureaucratic nightmare has to end! Dividing crab harvest into 12 different coastal sectors sounds like it invites poaching. The more complicated you make these things to understand the more you are going to invite people to blow off the regulations and do whatever they want. All hunting and fishing regulations in the state of Oregon should be able to fit into a 16 page pamphlet. Other states do this to great success. The task of being informed about the regulations is a greater time suck than actually spending time out in the field. Expecting an individual hunter or fisherman to read 178 pages on regulation changes and comment on them is onerous and abusive. We don't recreate for a living... who has this kind of time?! The only logical answer is that this is done intentionally to terrorize the sportsman and subdue him into blind submission or surrender. This document and rule changes stink of bureaucrats looking for an excuse to exist. Stop measuring tiny units of space in the state. Regulations should be on, or off, state wide or potentially eastern and western Oregon. If you operated this way as a business, you would go out of business.

On Mon, Sep 20, 2021 at 2:05 PM Oregon Department of Fish and Wildlife <[odfw@public.govdelivery.com](mailto:odfw@public.govdelivery.com)> wrote:

**KINGSLEY Lisa M \* ODFW**

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**From:** chuck erickson <cerickson97838@yahoo.com>  
**Sent:** Monday, September 20, 2021 2:34 PM  
**To:** CORBETT Kelly C \* ODFW; RUMRILL Steven S \* ODFW; BRABY Caren E \* ODFW; ODFW Commission  
**Cc:** William Lackner  
**Subject:** Crab Man plan public comment

Dear Steven Rumrill and others, please consider adopting the following recommendations for inclusion into

1. **Elimination of Commercial crabbing in Oregon's bays.**
2. **Increase the sport harvest size size for retention of Dungeness crabs from 5 3/4 inches to 6 1/4 inches.**
3. **Prohibit the retention of softshell crabs.**
- 4 **Prohibit the use of cab snares to eliminate the continued loss of crabs to lost or abandoned crab snares.**
- 5.**Require crabbers to return unwanted crabs to the waters of the bay or ocean unharmed.**
6. **Replace the limit on the take of green crab to no limit.**
7. **Tourism should matter. People from all over the Western United States come to Pacific Coast to enjoy what we have to offer. We need a plentiful supply of big crabs for the tourist to catch. Move the commercial crab harvest into marine zone and leave the bays for sport harvest. "Three great forces rule the world: Stupidity, Fear and Greed" - Albert Einstein**

Thank you for your consideration,  
Chuck Erickson CDAO

**CONFIDENTIALITY NOTICE:**

**A river without salmon is a body without a soul.**

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**KINGSLEY Lisa M \* ODFW**

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**From:** David and Dee Ragsdale <deeragsdale@gmail.com>  
**Sent:** Monday, September 20, 2021 9:08 PM  
**To:** COMMISSION ODFW \* ODFW; CORBETT Kelly C \* ODFW; BRABY Caren E \* ODFW; Barrett Edgar  
**Subject:** Recommendations for changes to management of OR crab fishery  
**Attachments:** crab rules.docx

Attached are my recommendations for changes to the OR crab fishing regulations. Thank you for the opportunity to provide input about managing this public resource.

David Ragsdale  
PO Box 88  
Ophir, OR 97464  
360 701-4798

**KINGSLEY Lisa M \* ODFW**

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**From:** Kayem El <kkmlane1@gmail.com>  
**Sent:** Tuesday, September 21, 2021 1:56 PM  
**To:** COMMISSION ODFW \* ODFW  
**Subject:** Dungeness Crab Fishery Plan

Dear ODFWCommissioners,

What gives me great pause within this plan is that it addresses "Climate Change". Agenda oriented politicians have shown their true colors in their plan to restrict rights under the guise of "Climate Change". I do not agree to any plan using this politically motivated agenda and you, as representatives of the taxpayers of Oregon should not either.

Kris Lane

**KINGSLEY Lisa M \* ODFW**

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**From:** Susan Murbach <sooz@actionnet.net>  
**Sent:** Tuesday, September 21, 2021 7:10 PM  
**To:** COMMISSION ODFW \* ODFW  
**Subject:** Dungeness crab Management plan comments

September 21, 2021 Dear Wildlife Managers,

Thank you for your time and effort put into the research of the management and care of Dungeness crabs and ecosystem resilience of this fishery. The management info and collected facts are very enlightening. What an awesome and resilient fishery. As a spouse of a commercial fisher for 35 years I know how much Christmas revolved around this harvest. It seems fishers feel it necessary to sometimes brave the bad weather of December and January to provide for their families. Hopefully with diversification more will have money to tide themselves over during periods of bad weather.

Since my husband passed away, I now harvest Dungeness recreationally, religiously obtaining a recreational shellfish permit. One of the major differences I have seen in the 40 years of living near the Alsea bay is the major increase in the seal population. How many can this bay support? Will Mother Nature eventually reduce the population with disease or starvation? The flounders have virtually disappeared, compared to years ago. Do you track these populations? Recreational harvesting by humans has also increased over this time period. Thank you for creating a written plan to keep crab populations abundant. Thank you for harvest limits!!

I appreciate having a chance to view, listen and comment on this comprehensive management plan and know our money is being used wisely. Ecosystem resilience needs to be taken seriously by governments and business for the future of coming generations of humans and other creatures of this world.

Sincerely,

Susan Murbach  
P.O. Box 834  
Waldport, Or 97394

## KINGSLEY Lisa M \* ODFW

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**From:** Barrett Edgar <seacliff4@gmail.com>  
**Sent:** Tuesday, September 21, 2021 7:27 PM  
**To:** COMMISSION ODFW \* ODFW  
**Subject:** My comment on the Crab rules

1. *Close the commercial crabbing season earlier in summer.* An overwhelming percentage of the crab harvested commercially are taken early in the season. By summertime there are few legal crab left to harvest and they are likely to be soft and not meet minimum meat content. Closing the season earlier will also leave more 'seed stock' for future reproduction of this important fishery.
2. *Leave recreational crabbing open year round.* There is no good reason to close recreational crab fishing from Oct 15 to Dec 1. Ocean crabbing in summer is typically poor because after commercial season the remaining legal crabs are few and the crab are routinely small and soft. The quality of crabs are just beginning to become good by the end of October... but the recreational season closes for this 6 week period. There would be little take during this period by recreational fishermen because ocean conditions are seldom suitable for our smaller watercraft to safely navigate on the ocean. If there is a concern that commercial fishermen would take advantage of crabbing being open to recreational fishermen, then adopt regulation to prohibit this.
3. *Restrict commercial fishing for crab near the mouths of all entrances to harbors.* The heavy concentration of the lines of commercial pots in these areas are a well know hazard to navigation that has led to the death of boaters. I can relay from personal experience that it is often very difficult to find a safe path through the pot lines. I suggest that absolutely no commercial (or recreational to be fair) crabbing be allowed within at minimum distance of at least a quarter mile on each side from designated navigation channels and harbor entrances. A larger distance would be better and provide more safety for boaters.
4. *Impose a small fee for each commercial crab pot fished to support efforts to collect derelict gear.* There is an incredible amount of commercial crabbing equipment lost or not collected each year. This gear is a navigation hazard and continues to fish and that wastes the resource. The fees could be used to fund ODFW costs for recovering this gear and/or pay rewards for reporting, collecting and returning crab gear by private entities. This would actually benefit the commercial fishermen because there would be a greater chance their gear would be returned to them.
5. Thank you
6. Barrett Edgar Gold Beach OR

**KINGSLEY Lisa M \* ODFW**

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**From:** elsombre@gmail.com  
**Sent:** Monday, September 27, 2021 12:13 PM  
**To:** CORBETT Kelly C \* ODFW  
**Subject:** Commercial Crabbing in Oregon Bays

Hi, Kelly,

Good Morning

Thank you for the opportunity to comment before October.

I have crabbed several times with friends in Netarts Bay and the last year was meager and I believe that commercial crabbing is the cause.

Please consider STOPPING COMMERCIAL CRABBING IN OREGON BAYS.

Cheers,  
Michael Peterson  
6736 NE Tillamook St.  
Portland, OR 97213

503.358.6226



## **KINGSLEY Lisa M \* ODFW**

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**From:** lorenzo <lorenzotm@comcast.net>  
**Sent:** Monday, September 27, 2021 11:35 AM  
**To:** CORBETT Kelly C \* ODFW  
**Subject:** Commercial Crabbing in Oregon Bays

Good Morning

Thank you for the opportunity to comment before your meetings later in October.

First I would like to commend Oregon Fish and Wildlife about the 171 page report on Commercial and Sports Crabbing in Oregon. It was well done and very informative.

I'm a native Oregonian. I have crabbled several times a year almost every year since 1973 when I first crabbled in Netarts Bay.

I have crabbled in 6 or 7 bays on the Oregon Coast.

The past year I have been very disappointed with the meager success in Netarts and Nehalem Bays for crab. Even more troubling is that commercial fishermen are crabbled in the bays.

I have talked with people at Oregon Fish and Wildlife before about this issue, and although there has been an open-minded approach by the department, the situation still stresses me out.

After years of using sports boats in the bay, two years ago I started renting boats there.

On two previous trips to crab at Netarts Bay this spring, I did get a few crabs in the bay, but I know the bay well. The boat rental there had two other boats rented one day and three others rented another day.

In those five boats, not a single crab was taken, although, the boat rentals are over \$120 with traps, bait, and licenses. Those visitors probably would not be back to rent boats again.

Yet, commercial crabbers were allowed in the bay to take an unlimited amount of crab. I understand that each boat could only use rings, and just 15 I think, but there is no limit on their take.

I'm also aware that the legal size for commercial crabs is larger, but the bay seems to be cleaned out of large hard-shelled crabs. The difference in size between legal commercial and sports crabs is very small.

If the OF&W report on crabbled is correct, only .016 percent of the total commercial crab take is in the bays, still 25,000 pounds of crab taken there has a serious impact on the success of sports crabbers.

And the commercial season in the bays only helps a very small number of people. With razor clamming very limited because of red tide, the coastal communities economic well-being is more closely associated with the sports fishermen coming from around Oregon, the Northwest, and the U.S.. I live in McMinnville. My crabbled friends live in Troutdale, Portland, and Hillsboro. We not only stay at coastal rental houses, and motels, we eat in local restaurants, buy locally, and purchase Oregon Fish and Wildlife Shellfish licenses. We have reduced or eliminated travels to the coast to crab, as the results have been so pathetic.

I really feel sorry for people trying to make a living at the coast. They need tourism and crabbled, especially in winter when there is limited clamming, and when the crabbled is best, and their businesses are slow.

Please consider STOPPING COMMERCIAL CRABBING IN OREGON BAYS. We live in a democracy which should serve the majority, not a small minority of people.

Thanks for the opportunity to give my opinion.

Cordially,

Larry Snider

2371 N.W. Horizon Drive, McMinnville, Oregon 97128

H.503-857-0327

**KINGSLEY Lisa M \* ODFW**

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**From:** Theodore <yuiqwe1@gmail.com>  
**Sent:** Friday, October 1, 2021 1:35 PM  
**To:** COMMISSION ODFW \* ODFW  
**Cc:** CORBETT Kelly C \* ODFW; RUMRILL Steven S \* ODFW  
**Subject:** Dungeness crab plan

Dear Commission:

Please open the ocean sport crab season year round or at least through October.

I can find no logical explanation for closing the ocean sport crabbing season from Oct 16 through Nov 30. The crab are just getting nice and heavy/full again after the molt, ocean salmon season is still open through the end of October in the largest section of the coast from Cape Falcon to Humbug Mtn and of course rockfish season is also open. Why not allow crabbing at the same time?

As it is now the ocean crab season re-opens Dec 1 which is about the time sport crabbers wouldn't/shouldn't be going out because the ocean becomes too dangerous on many days. A Dec 1 opening may entice people to go out at a time when maybe they shouldn't. Season openings do that.

If ODF&W wants to make the regulations less confusing simply make the ocean season open year round as the bays currently are. That would remove the possible incentive to go out on Dec 1 to catch an opening day. Sport crabbers take a tiny part of the allowable crab harvest in comparison to the commercial take. Leaving the season open year round would not harm the commercial take at all since sport crabbers won't be out in any numbers during December through March because of adverse ocean conditions anyway.

Thanks for listening.

Sincerely,

Ted Chu - 41400 Anderson Rd, Nehalem, Oregon 97131, phone 971-227-3422

**From:** tonya joens <[bigsky948@gmail.com](mailto:bigsky948@gmail.com)>  
**Sent:** Sunday, October 03, 2021 11:23 AM  
**To:** RUMRILL Steven S \* ODFW <[Steven.S.RUMRILL@odfw.oregon.gov](mailto:Steven.S.RUMRILL@odfw.oregon.gov)>  
**Subject:** Commercial crabbing Alsea Bay

Hi Steve

My Name is Scott Joens [bigsky948@gmail.com](mailto:bigsky948@gmail.com) my concern is the commercial crabbing taking place in the Alsea Bay . I was crabbing last year and there was at least 3-4 commercial crabbing boats in the bay with 55 gallon containers x2 being filled in each boat with approximately 150-200 crab being taken daily per boat. They were also rude and crowding us out of our usual spots were we crab one boat attempted to run over our crab pot floats intentionally . I feel that there should be no more than one boat allowed to commercial crab in the bay with a limit of how many rings they are able to use and how many crabs per day/week/month they can harvest. I live in Waldport and crab this bay it is not cheap license/bate/gear/fuel/launch fee etc\$\$\$\$\$  
In closing please help keep this bay recreational.

Thank You  
Scott Joens  
541-639-6296

Sent from [Mail](#) for Windows

From: Jim Hamm <jham66@outlook.com>  
Sent: Wednesday, October 06, 2021 6:39 PM  
To: RUMRILL Steven S \* ODFW <Steven.S.RUMRILL@odfw.oregon.gov>  
Subject: Oregon crab harvest

There should be no commercial harvesting of crab inside the bays. Leave it for the sportsman.  
Also there should be no closed season for sport harvest, it should be open the entire year.

**KINGSLEY Lisa M \* ODFW**

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**From:** Paula Tucker <outlook\_907EE1FD07911575@outlook.com>  
**Sent:** Wednesday, October 6, 2021 6:01 AM  
**To:** COMMISSION ODFW \* ODFW  
**Subject:** Oregon Dungeness Crab Fishery Management Plan

I have been asked to comment on the Oregon Dungeness Crab Fishery Management Plan. I have been a part of the coastal community for over 50 years. During that time I have observed sport and commercial crabbing. It has been my observation that a lot of sport crabbers do not understand the damage they do by harvesting undersized and soft crabs. I have been "gifted" crab that is not edible due to it's immaturity and/or softness. I have watched the people proudly display their catch and shook my head because it would have been so much better if they had let it go back and they are doing so much damage to the resource.

Commercial crabbers work hard to follow the rules and regulations set forth. They want their livelihood to continue. It is very important that the commercial boats be allowed to harvest. They provide a service that is needed both to the economy and the ecology. Commercial crabbing should have less oversight and sport crabbing more. Commercial fishing is more important than sport and I am a sports fisherman!!

Sent from [Mail](#) for Windows



Randy Ericksen  
Fisheries Scientist/Advisor  
PO Box 554  
Corbett, OR 97019  
October 7, 2021

Oregon Department of Fish and Wildlife  
Crab Management Team  
Caren Braby, [Caren.E.Braby@odfw.oregon.gov](mailto:Caren.E.Braby@odfw.oregon.gov)  
Kelly Corbett, [Kelly.C.Corbett@odfw.oregon.gov](mailto:Kelly.C.Corbett@odfw.oregon.gov)  
Liz Perotti, [Elizabeth.A.Perotti@odfw.oregon.gov](mailto:Elizabeth.A.Perotti@odfw.oregon.gov)

Sent via email

Dear Crab Management Team,

Thank you for the opportunity to comment on the draft Oregon Dungeness Crab Fishery Management Plan (FMP). I am a consultant at ForSea Solutions assisting the Oregon Dungeness Crab Commission (ODCC) with developing, implementing and tracking progress on their Fishery Improvement Plan (FIP). ForSea Solutions was contracted by the ODCC as its FIP lead and the formal US Oregon Dungeness crab - pot/trap FIP was launched in August 2020 on [FisheryProgress.org](http://FisheryProgress.org) (<https://fisheryprogress.org/fip-profile/us-oregon-dungeness-crab-pottrap-0>). The FIP established a number of sustainability goals designed to prepare the Oregon Dungeness crab fishery for eventual re-certification with the Marine Stewardship Council (MSC). ODCC has asked me to review the FMP on their behalf and recommend edits to improve consistency with MSC Principles and Scoring Indicators.

In general, I found the FMP well organized and provided a strong foundation for sustainably managing the fishery and the ecosystem on which it depends. There are a number of specific areas that could be re-worded to better align with MSC as described below.

**FMP A. Resource Analysis, Section VI. Sustainable Harvest Levels Page 49.** States “Dungeness crab fisheries along the West Coast are not managed through stock assessments that respond to annual changes in abundance, catch, or escapement. Instead, managers employ a precautionary approach that maintains a level of sustainability while allowing for some degree of uncertainty”. However, it does not explicitly state what is meant by “a precautionary approach”.

Action A of Goal 8 in the FIP is to “Develop a Fisheries Management Plan (FMP) for the Oregon Dungeness Crab fishery that explicitly incorporates the precautionary approach”. This Goal is designed to address MSC Performance Indicator (PI) 3.1.3. To achieve a score of at least 80 (the

goal of the FIP), MSC requires that “Clear long term objectives that guide decision making, consistent with MSC fisheries standard and the precautionary approach, are explicit within management policy”. Further MSC guidance states that the precautionary approach is interpreted to mean “being cautious when information is uncertain, unreliable or inadequate and that the absence of adequate scientific information shall not be used as a reason for postponing or failing to take conservation and management measures” which is taken directly from the UN Fish Stocks Agreement, 1995.

To strengthen this section to achieve the desired outcome of Goal 8 of the FIP, I recommend adding the following sentence to the first paragraph in Section VI of the FMP: ***Managers will apply greater caution when information is uncertain, unreliable or inadequate, and the absence of adequate scientific information shall not be used as a reason for postponing or failing to take conservation and management measures.***

**FMP B. Harvest Management Strategy, Section I. Management Approach, a. Management Goals Page 55.** The first goal is “1) Ecological – Ensure the long-term reproductive capacity of the Dungeness crab population, minimize impacts to other species, and preserve ecosystem health.” Ecological objectives are further described on the next page including:

“1.2 Maintain, develop, and implement management measures that support ecosystem structure, function, and resilience to changing climate and ocean conditions.

1.3 Maintain, develop, and implement management measures that minimize adverse impacts to habitat, marine mammals, and other species from interactions with Dungeness crab gear.”

These objectives are implicitly consistent with MSC’s Principle 2 outcomes but could be strengthened to be more explicit. Action B of Goal 9 in the FIP is to “Incorporate explicit short and long-term objectives into the FMP consistent with achieving the outcomes expressed by MSC’s Principle 2 (sustainability of non-target species, ETP species, habitats and ecosystem).” This Goal is designed to address MSC PI 3.2.1. To achieve a score of at least 80, MSC requires that “Short and long term objectives, which are consistent with achieving the outcomes expressed by MSC’s Principles 1 and 2, are explicit within the fishery specific management system.” MSC Principle 2 outcomes are further defined in PIs (2.1.1, 2.2.1, 2.3.1, 2.4.1 and 2.5.1).

To strengthen this section to achieve the desired outcome of Goal 9 of the FIP, I recommend revising the following objectives on page 55 of the FMP to:

***1.2 Maintain, develop, and implement management measures that prevent serious or irreversible harm to the key elements of ecosystem structure and function, and that support ecosystem structure, function, and resilience to changing climate and ocean conditions.***

***1.3 Maintain, develop, and implement management measures that minimize adverse fishery impacts to habitat, marine mammals, and other species. These measures: seek to avoid serious or irreversible harm to habitat structure and function; do not hinder recovery of endangered, threatened or protected species; and aim to maintain other species above the point where recruitment would be impaired or other similar biologically based limits.***



On behalf of ODCC, I appreciate the opportunity to comment on the draft FMP to better align with MSC Principles and Scoring Indicators.

Sincerely,

Randy Ericksen

**KINGSLEY Lisa M \* ODFW**

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**From:** Steve Godin <stevegodin@rconnects.com>  
**Sent:** Thursday, October 7, 2021 5:16 PM  
**To:** COMMISSION ODFW \* ODFW  
**Subject:** Commercial Crabbing in the Bays

Dear ODFW Commissioners,

I do not support commercial crabbing in the Oregon's Bays. Many recreational crabbers are pretty much restricted to the bays. Oregonians and visitors come to the Oregon bays to recreate, some of them take their families to designated docks to throw crab rings into the water in hopes of catching a few crabs for dinner, and to get their families excited to be there. Some visitors bring their small boats, not ocean boats, into the bays to drop crab traps and fish. According to ODFW commercial crabbers harvest 94% of all crabs taken in Oregon. Give the recreational crabbers a break and limit commercial crabbers to the ocean.

This is an email message that I sent to Caren Braby, ODFW on September 30<sup>th</sup>." I don't normally fish the Umpqua River for fall Chinook. However, I did yesterday. I trolled down river to Winchester Bay and was disheartened to see three commercial crabbers working the river and bay. They through back lots of immature crabs and redistributed all their traps. This all happened as I was trolling towards Winchester Bay. ODFW ends the commercial crabbing season in the ocean, which displaces commercial crabbers into bays. Winchester Bay is a small body of water and commercial crabbers like these leave little for recreational crabbers."

Thanks for your consideration,  
Steve Godin  
Oregon Coast Anglers, President

-----Original Message-----

From: Jim Koudelka <koudelkaclay@gmail.com>

Sent: Sunday, October 10, 2021 7:56 AM

To: RUMRILL Steven S \* ODFW <Steven.S.RUMRILL@odfw.oregon.gov>

Subject: Sport Crabbing feedback, comments

Hello Steve

I am so glad to have the opportunity to give feedback on the upcoming crab regulations.

I am an avid sports , recreational crabber and fisherman. Every fall when I spend numerous days fishing Garibaldi and then crabbing Netarts bay I am confronted with what I feel is a problem in the regs. At Netarts I run into numerous commercial crabbers who are working the bay. I was appalled to see this. When I spoke with them they said the ocean was closed but they can crab the bays , Netarts from Monday thru Thursday and Friday, Saturday, Sunday was for recreational crabbers only. Problem is that this small bay does not hold up to their crabbing. I have crabbed all week here and by Friday due to their 4 days of efficient crabbing the crab goes kaput for us. Some of these crabbers have come up from the south, many of the crabs have still not filled out enough for the market. Why is there commercial crabbing going on in this small bay? Recreational crabbing will bring in so much more local money and Netarts is getting more and more popular. I really hope this pristine tiny bay can be put off limits to commercial crabbing.

Please if you have time give me a response and good luck with all your work in this area.

Best Fishes

Jim Koudelka

617 549 9444

koudelkaclay@gmail.com

**From:** Ann Rava <[aerava@q.com](mailto:aerava@q.com)>

**Sent:** Sunday, October 10, 2021 9:58 AM

**To:** RUMRILL Steven S \* ODFW <[Steven.S.RUMRILL@odfw.oregon.gov](mailto:Steven.S.RUMRILL@odfw.oregon.gov)>

**Subject:** Recreational Crabbing guidelines

Hello Mr. Rumrill,

I just wanted to add my input on the recreational crabbing guidelines. We generally crab in Alsea Bay and in recent years the bay has seen a marked increase in recreational crabbers. The bay cannot support this increased number of crabbers in the long term. My suggestion would be to lower the daily limits per person, or have a limit per vessel per day. Many boats are harvesting their per person limits with 4 or more people in each boat, and returning the next day for more. In my opinion, many of these crab are going to waste, as it's fun to bring in so many crab, but the reality of consuming that many crab is beyond most people, and they end of throwing them away. I have heard this from many other people who are knowledgeable on this as well. I feel that if we want to keep the crab in the bays from being depleted, something needs to be done sooner than later.

Thanks for listening!

Tony and Ann Rava  
Salem, Oregon

**From:** [bulat3@comcast.net](mailto:bulat3@comcast.net) <[bulat3@comcast.net](mailto:bulat3@comcast.net)>

**Sent:** Monday, October 11, 2021 11:45 AM

**To:** RUMRILL Steven S \* ODFW <[Steven.S.RUMRILL@odfw.oregon.gov](mailto:Steven.S.RUMRILL@odfw.oregon.gov)>

**Subject:** couple of comments on the crab fishery plan

Hi Steve,

Steve Pfeiffer. Hope you're doing well and surviving politics – wish some one had told me in my youth politics figures into things way more than science.

I did a loose run thru of the draft “Dungeness crab management plan”. Nicely done and readable.

Couple of things I am curious about. Figure 11, page 32, CPUE for Bay recreational fishery. The CPUE is highest in August, then falls off in September, and then slightly upticks in October. From personal experience, the CPUE rebounds dramatically in December, when the bay commercial guys can't fish and the ocean is shut down due to low yield. Maybe I am reading too much into this, but I think this reflects a significant impact by bay commercial, and possibly a knock-on effect on recreational crabbers, who realize it's not “great” after the bay commercial guys start, so experienced recreational crabbers don't go. I think if you have more granular data, parsed out by individual bays, it might show this more dramatically. The lesser effort by experienced recreational crabbers means fewer dollars into the seaside communities that benefit from their presence.

Regarding the catch log. A good thing to do, and maybe cross reference (at least until you can go electronic) with reports of bay commercial crabbing by recreational folk. A report by a recreational crabber, stating a commercial vessel was seen coming at such & such a time, should be matched to a catch log for the same vessel. The old “trust but verify”. Other comment on the log, is report is made of pounds caught, with no regard to the numbers caught. I recall someone from ODFW saying that this allowed an estimate of number of crab caught. Problem is it doesn't reflect how filled out the crab are. By having # of crabs caught, plus weight you can make a reasonable estimate of yield. This would help ensure a quality product is available by seashore visitors and whatever live market they are selling their crab to. Much like the yield requirement for ocean commercial crabbing. Would serve to protect the brand.

Last direct comment – bay commercial. Is this is a limited entry fishery? Limited number of vessels or better yet limited # of trips? Would help even things out, as 20+ years ago you rarely saw bay commercial crabbers, now you just about always see them during the open months.

Something just out of curiosity. I recall an exploratory effort to better utilize the squid fishery of the coast, with a comment made that after spawning the entire adult population dies, thus it seems a waste not to harvest this resource more heavily. The dead squid are consumed voraciously by a number of critters, and I suspect a lot of Dungeness crab. What impact would removing this much biomass have on the growth rate of Dungeness crab? Just curious? One of the neatest dives you can make is La Jolla canyon in February. Tons of squid egg masses. Never did a night dive during that time period though.

Good luck with it – I don't envy you.

Steve

e-mail: [bulat3@comcast.net](mailto:bulat3@comcast.net)

cell: 503-396-2810