

VIA EMAIL ONLY
PUBLIC COMMENT



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The Half Moon Bay Seafood Marketing Association (HMBSMA) is writing this letter to provide comment on the management response to the Preliminary Determination of Significant Entanglement Risk dated 11/20/19.

Per our letter of 11/20/19, HMBSMA was supportive of a slight delay of the Dungeness Crab season of no more than 7-10 days to allow for clarity for management of the season moving forward. Now, we must ask that this time be used for an expeditious lifting of the restriction in consultation with California Dungeness Crab Fishing Gear Working Group per FG Code §8276.1(6)(C) and that every effort be made to reassess risk and get the fleet fishing prior to 12/15.

Further, we would ask that the Department use the language for a 72- hour notice to the fleet prior to set date as is stated in FG §5523(d). While we recognize this is a different code section and closure circumstance, that notification language was supported by the fleet and the Dungeness Crab Task Force because it allows for a safe and orderly opening of the season.

We are supportive of a flyover observation on Monday 12/2 to be shared with the Working Group with review time and pending results a 72-hour notice for a set date of 12/07.

We also understand there may be a possibility of a flyover observation on 11/25, or if weather conditions do not permit, on 11/26 which could potentially allow for a 12/1 set date while still allowing time for an assessment of the flyover and a 72-hour notice.

We appreciate your consideration and the opportunity to work with the Department and provide input. This is a very challenging situation for our fishing families, businesses and communities and we hope that it can be resolved quickly.

Sincerely,
Half Moon Bay Seafood Marketing Association