## California Rock Crab Facts You Should Know

Rock crab is NOT Dungeness crab and **not the same fishery**.

The Santa Barbara rock crab is the second largest commercial fishery - in terms of landings and number 3 - in terms of value in the Santa Barbara Channel.

The Santa Barbara Channel has ranked the third most productive area of nine areas in California for commercial fisheries!

Previously the rock crab fishery has **never** been closed due to the presence of (DA) Domoic Acid Toxins, even when toxin levels were substantially higher in rock crab and lobster samples.

Recent examples of high levels of DA detected in rock crab that resulted only in advisories (not closures):

Health advisory posted July 2015 Rock crab Visera – 140ppm, 120ppm, 260ppm, 100ppm; sample date June 16, 2015

Health advisory posted October 2014 Lobster Visera 230ppm, 280ppm, 130ppm

Health advisory posted February 2014 Rock crab Visera – 90ppm, 41ppm

And as well in April, September and December of 2013 With levels ranging from 31ppm to 216ppm

We've heard of seals and birds getting ill from these harmful algal blooms... but remember they are consuming massive amounts of seafood i.e. sardines, anchovies.

Ladies and Gentlemen these numbers have far exceeded the numbers that closed our fishery on November 6<sup>th</sup>!

Three rock crab... that's 3 tested greater than the standard action

level of 30ppm with results of 68, 57 and 64.

In 20 plus years there has not been one case of someone being ill or effected from Domoic Acid from Rock Crab. Remember this is a year round fishery that's never been closed!

This June, after crab tested much higher for domoic acid and only an advisory (not a closure) occurred. So why now?

Yet Public Health has been testing rock crab (and lobster) viscera for many years and even when samples were found with high levels of domoic acid – at times levels far exceeding 200ppm's – CDPH only issued an advisory! The fishery has never been closed until this November. We would like to know what the exact process is for declaring an advisory vs. closure. There should be a standard operating procedure that defines when such actions are taken.

The July advisory was the first mention of the domoic acid occuring in the meat of crabs. However we have not seen any data supporting this claim, and we believe the findings may be due to the process used to test the crabs. CDPH cooks the whole crab and then tests the meat, thus the meat could be contaminated during the cooking process. We believe if they clean the crab first by removing the viscera, as some do before consuming it you could have very slight traces of DA.

We have assisted with bio toxin sampling programs over the years and want to continue to participate in research that helps inform decisions regarding the risks associated with our fishery. We are concerned about the human health risks associated with consumption of our products, but we feel much more information was and is needed to warrant closure of the fishery.

I believe the rock crab industry in partnership with the Public Health and the Fish & Wildlife Departments can manage this resource without getting the public sick and completely shutting the fishing down, causing hardship to the fishing families and businesses. We the stakeholders request that a committee of fishermen, buyers, Fish & Wildlife and State Health Dept. personnel be formed to review all concerns involving both the sampling and criteria of warnings to the Fishery and to the public before we close a fishery down.

In closing we would like to request three things that our government representative's attending this meeting do:

- 1. Direct the state departments that closed down the fishery reconsider the closure based on the data provide above. We feel the closure was unwarranted and that a public health advisory, with some added information about risks of exposure, is sufficient for keeping consumers aware of the problem and safe while also supporting continuation of valuable state fisheries. Such has worked in the past.
- 2. The public health and resource agencies work with us those involved in the fishery to standardize the sampling program and define the process used for determining actions regarding the fishery and safe consumption of our products, in this case rock crab.
- 3. We'd also like those involved with the rock crab fishery to be included and equally provided "Special Relief Funds" that have been so publicly considered for Dungeness crab businesses! This immediate funding is crucial for our fishery and associated fishing families and businesses.

We thank you for the opportunity to express our concerns and for your consideration of these requests.