

# **Exhibit C**

**Supplemental Public Correspondence  
Received as of February 10, 2026**

**From:** Cody Chase  
**E-mail:** [chasecody973@gmail.com](mailto:chasecody973@gmail.com)  
**Sent on:** Thursday, February 12, 2026 5:24 PM  
**Subject:** Crab Fishery Petition

**Comment:**

Dear Commissioners,

My name is Cody Chase from Newport, Oregon. I am owner of a 42' crab fishing boat the F/V Monde Uni and a seafood retail business Chelsea Rose Seafood in Newport. I started Chelsea seafood 22 years ago at the age of 18 years old with a few live crab starting in April and grew the business to what it is now from having crab through out the year as I bought from local small boats. Now we commercially crab on our vessel and sell crab through the season generally from when we open the season until august 14th when the season closes down. We are a small family operation that depends on crab fishing throughout the year. Personally being involved in the whale meetings and groups from the beginning of their formations I have tried to help with the adaptations we have made to this point and believe we have come along way staying ahead of times with the changes in our oceans and whales.

Accepting this petition will affect our small business and all the crew members that work and depend on crab fishing along with our business that depends on having live crab throughout the season for people to buy. Losing our fishery will be devastating to us along with many boats and businesses up and down our coast.

Thank you for your time, we all understand the giant situation we up against

Cody chase

**From:** FishHer Columbia Pacific CommUNITY Alliance  
**E-mail:** [fishhercpca@gmail.com](mailto:fishhercpca@gmail.com)  
**Sent on:** Friday, February 13, 2026 9:17 PM  
**Subject:** Crab Fishery Petition

**Comment:**

Dear Commissioners,

Attached is my public comment urging you to not support the petition to amend OAR 635.005.

Thank You,

Amy Sharp  
President  
FishHer: Columbia Pacific CommUNITY Alliance

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**Amy Sharp**

86085 S. Wahanna Rd.

Seaside, OR 97138

360-304-8833

FishHerCPCA@gmail.com

13th February 2026

Dear Commissioners,

My name is Amy Sharp. I am a commercial fisherwoman and President of FishHer: Columbia Pacific Community Alliance, a 501(c)(3) nonprofit dedicated to strengthening local commercial fisheries through outreach, emergency response, conservation engagement, and blue economy initiatives in Pacific, Clatsop, and Tillamook counties.

FishHer was founded in January 2024 after the Ilwaco Landing fire destroyed 3,800 crab pots just days before the start of crab season, causing \$1.4 million in damage. In response, fishing communities from California to Washington mobilized to loan gear, deliver equipment, and work side by side to ensure fishermen could make their season. It reaffirmed what we know to be true: **an injury to one is an injury to all**. From that moment, FishHer was created to strengthen the long-term safety, resilience, and sustainability of our fishing communities.

Our local crab fleet is composed primarily of small, owner-operated family businesses. These are not diversified corporate enterprises, or NGOs with multiple funding sources. Many vessels depend almost entirely on the Dungeness crab fishery for their annual income. These families absorb environmental, economic, and great personal risk each season, and their livelihood depends on healthy oceans and sensible management.

This petition aimed at OAR 635-005 would mandate widespread conversion to costly, unproven pop-up gear and gear types, depth restrictions, gear reductions, and zone closures that is not practical or warranted. Pop up gear is priced in the tens or hundreds of thousands of dollars. This is not financially viable for our crab fleet. Banks will not finance experimental technology. A 40% gear reduction during productive months is not an adjustment; it is the loss of a season's viability. The threat of unpredictable closures eliminates business stability and prevents long-term planning or investment.

We support whale conservation. Oregon crabbers have already shouldered great cost to implement robust, collaborative mitigation measures in coordination with ODFW. **Whale populations are increasing by 8% annually**, and cooperative

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management has demonstrated incredible progress. That model being science-based, adaptive, and collaborative is working!

A true blue economy requires sustainable ecosystems and sustainable livelihoods. Oregon's Dungeness crab fishery is renewable, well-managed, and central to coastal economic stability. Effectively destroying Oregon's number one fishery does not strengthen conservation; it destabilizes communities while offering no clear evidence of additional ecological gain.

Commercial fishermen are primary food producers, operating without the structured federal risk protections afforded to land-based agriculture. They shoulder volatility few other food producers are expected to absorb alone. Additional regulatory burdens that remove economic feasibility do not create resilience; they accelerate collapse.

FishHer knows what our families can and cannot survive. We know the budgets, the boat payments, the gear costs, the mortgage payments, the medical debts, the college savings that depend on fishing income, and moving this petition forward means much of the crab fleet will not survive. A 40% gear reduction during some of the most profitable months of the season is not a conservation measure; it's a **death sentence** for small operators who depend on April-June fishing.

**These are families who scrape together every dollar to maintain their vessels, purchase fishing gear, bear the direct economic consequences of management decisions, and keep fishing to ensure food security for our nation.**

**We are food harvesters already working without the protections of the Farm Bill Act!**

This petition was written by people who have never had to explain to their children why they can't afford school supplies because the crab season was shortened. People who have never scrambled to cover health insurance or been forced to go uninsured when fishing income drops 60%.

We respectfully urge you to reject this petition and maintain the collaborative management framework that protects marine life while sustaining Oregon's fishing families. This is an agenda driven petition that seeks to weaken and destroy commercial fishing based on emotion and not science. We urge decision-makers to evaluate whether current, proposed approaches will produce measurable ecological improvements or simply perpetuate **cycles of legal challenge without corresponding gains** in habitat restoration, stock recovery, or community resilience.

California advocacy groups are pushing for rules that will destroy Oregon families. **They face no consequences when our communities collapse. We do.**

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**Stand with Oregon's coastal communities. Protect working families. Preserve this iconic fishery that has sustained our coastal economy for generations.**

Sincerely,

Amy Sharp

F/V Spring Persuader

President, FishHer: Columbia Pacific CommUNITY Alliance



Photos of commercial fishermen and FishHer members participating in conservation efforts at the Tongue Point net pens and stream enrichment efforts at the Klaskanine Hatchery.

**From:** Mike Saindon  
**E-mail:** [manager@portofgaribaldi.org](mailto:manager@portofgaribaldi.org)  
**Sent on:** Friday, February 13, 2026 9:28 AM  
**Subject:** Crab Fishery Petition  
**Comment:**

Commissioners,

Please include the attached letter from the Port of Garibaldi in the official public record regarding the Oregon commercial Dungeness crab petition and the hearing scheduled for February 20, 2026. We urge you to take this letter, along with others received from Oregon ports and counties, into consideration as you deliberate on this matter.

Thank you for your time and consideration.

Michael Saindon  
General Manager, Port of Garibaldi  
PO Box 10  
Garibaldi, OR. 97118  
Office: 503-322-3292  
Cel: 503-812-8979



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Garibaldi, Oregon 97118  
Port Office (503) 322-3292  
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Email: [info@portofgaribaldi.org](mailto:info@portofgaribaldi.org)  
Web site: [www.portofgaribaldi.org](http://www.portofgaribaldi.org)

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February 11, 2026

Oregon Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

**RE: Petition to Amend OAR Chapter 635, Division 5 – Oregon Commercial Dungeness Crab Gear**

Commissioners,

On behalf of the Port of Garibaldi, a public port district whose marina, moorage, facilities, and local economy are deeply intertwined with Oregon's commercial Dungeness crab fleet, we respectfully submit this letter in opposition to the petition received by the Commission on December 11, 2025, seeking sweeping amendments to Oregon Administrative Rules governing the Oregon commercial Dungeness crab fishery.

The Port of Garibaldi strongly supports the **Oregon Coast Crab Association** and the statewide coalition of permit holders, captains, buyers, processors, and coastal communities who are actively working to identify practical, science-based, and economically viable alternatives that address marine life protection without dismantling the backbone of Oregon's most valuable commercial fishery.

**The Economic Importance of the Dungeness Crab Industry**

For the Port of Garibaldi and many other small coastal ports, Dungeness crab is not simply one fishery among many — it is the primary economic driver that sustains:

- Commercial moorage revenue that funds port operations
- Local seafood processors and buyers
- Fuel docks, repair yards, marine suppliers, and service trades
- Restaurants, tourism, and coastal small businesses
- Family-wage jobs for hundreds of Oregon families
- The tax base of small coastal communities

The proposed rule changes, particularly:

- The 40% late-season gear reduction,
- The April 1 depth restrictions,
- The effective phase-out of conventional gear by 2028,
- The automatic closure triggers tied to entanglement reporting,

would create immediate and devastating economic consequences for coastal ports and communities that rely on this fishery for survival.

For many vessels, the late season is what allows them to remain financially solvent after the early season price fluctuations and weather limitations. Removing this opportunity effectively removes the economic viability of many operations.

The ripple effect would not be limited to fishermen. It would directly impact ports, processors, transporters, restaurants, and the broader coastal economy.

### **Shared Commitment to Protecting Marine Life**

The Port of Garibaldi wishes to be very clear: we fully support efforts to protect whales, sea turtles, and marine ecosystems. The crab fleet has already implemented substantial gear marking, reporting, and best-management practices over the past several years to reduce entanglement risks.

We share the petitioners' goal of minimizing entanglement risk. However, we do not believe the approach outlined in this petition is balanced, practical, or economically survivable for the industry or the communities that depend on it.

### **The Need for Practical, Collaborative Alternatives**

We strongly support:

- Continued evaluation and testing of pop-up/on-demand gear in a realistic, voluntary, and phased manner
- Adaptive management informed by real-world data from Oregon waters
- Collaborative solutions developed with the fishing industry, not imposed upon it
- Alternatives that achieve conservation goals without eliminating the fishery's viability

Mandating rapid, large-scale regulatory changes before technologies are affordable, field-proven, enforceable, and commercially workable places an impossible burden on fishermen and coastal infrastructure.

## Transparency and Emergency Closure Provisions

We are particularly concerned about provisions that would:

- Require immediate public entanglement notices within 48 hours without full investigation,
- Trigger automatic zonal or statewide closures tied to single or uncertain incidents.
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These provisions create regulatory instability that would make it nearly impossible for fishermen, processors, and ports to plan operations or maintain financial sustainability.

## Conclusion

Oregon's commercial Dungeness crab fleet is not the enemy of marine conservation. It is a responsible, multigenerational industry that is already working toward solutions. We respectfully urge the Commission to deny the petition as written and instead work with the Oregon Coast Crab Association, industry stakeholders, scientists, and coastal communities to develop balanced solutions that protect both marine life and the economic survival of Oregon's coastal communities.

The Port of Garibaldi stands ready to participate in that collaborative process.

Respectfully,



Valerie Folkema  
Commission President



Bob Browning  
Commission Vice President



Kelly Barnett  
Commission Secretary



Amanda Cavitt  
Commissioner



Michael Saindon  
Port Manager

From: [skent@portofumpqua.net](mailto:skent@portofumpqua.net)  
E-mail: [skent@portofumpqua.net](mailto:skent@portofumpqua.net)  
Sent on: Friday, February 13, 2026 10:02 AM  
Subject: Crab Fishery Petition

**Comment:**

Hi

Please find the attached letter from the Port of Umpqua regarding crab line proposed changes.

Scott M. Kent, PE, PhD  
Port Manager  
1877 Winchester Avenue  
PO Box 338  
Reedsport, OR 97467  
(541) 271-2232



**Port of Umpqua**  
1877 Winchester Ave  
PO Box 388  
Reedsport OR 97467

Office: 541.271.2232  
Fax: 541.271.2747  
[portofumpqua@portofumpqua.net](mailto:portofumpqua@portofumpqua.net)

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February 10, 2026

The ODFW Commission  
Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

To Whom It May Concern:

On behalf of the Port of Umpqua, I am writing in response to the petition concerning Dungeness crab gear involvement with whale entanglements. We appreciate the opportunity to provide comment and recognize the importance of protecting marine mammals. At the same time, it is critical that any regulatory decisions fully consider the economic, operational, and community-level impacts on Oregon's working ports and the coastal communities they serve.

The Port of Umpqua supports a diverse range of users, including commercial fishermen, recreational boaters, marine service businesses, and the general public. The commercial Dungeness crab fishery is one of the most economically significant and consistent contributors to port activity in our region. Revenues generated through this fishery support not only fishermen and their crews, but also port operations, local processors, fuel docks, gear suppliers, marine repair facilities, truckers, and numerous shore-based businesses.

Additional restrictions or closures proposed under this petition would directly reduce vessel traffic, landings, and economic throughput at the port. For a smaller coastal port like ours, even modest reductions in fishing activity can have outsized consequences, impacting port revenues needed for maintenance, dredging coordination, infrastructure improvements, and public access facilities. These impacts extend beyond commercial fishing interests and affect the broader community that relies on a functioning, financially stable port.

The effects would also be felt by the general public. Reduced port revenue and activity can limit the Port's ability to maintain safe navigation, support emergency response capabilities, and provide services and access for recreational users. Coastal communities depend on healthy working ports not only for jobs, but for safety, infrastructure, and local economic resilience.

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It is important to note that Oregon's Dungeness crab fishery already operates under extensive and evolving management measures, including gear limits, mandatory line marking, season timing adjustments, and area-specific regulations. These measures have been implemented with significant cost and effort by fishermen and ports alike. Confirmed whale entanglements directly attributed to Oregon commercial crab gear remain limited, and in many cases entanglements involve unidentified or out-of-state gear. Further broad restrictions based on incomplete or generalized data risk creating substantial local harm without a clear, demonstrable conservation benefit.

From the Port's perspective, decisions of this magnitude must be based on Oregon-specific data, careful analysis, and an understanding of real-world impacts to coastal infrastructure and communities. Broad precautionary measures that disproportionately affect working ports and small coastal economies threaten the long-term viability of the very communities tasked with stewarding Oregon's marine resources.

For these reasons, the Port of Umpqua respectfully but firmly urges the Department to deny this petition. A hard no is necessary to protect the economic stability of Oregon's ports, the livelihoods of commercial fishermen, and the broader public interest served by maintaining strong, functional coastal communities.

Thank you for the opportunity to provide comment and for your consideration of the impacts to Oregon's ports and coastal communities.

Sincerely,

*Joe Mulkey*

Joe Mulkey  
Port of Umpqua, Vice President

From: Orion Ashdown  
E-mail: [paiute7@gmail.com](mailto:paiute7@gmail.com)  
Sent on: Friday, February 13, 2026 10:33 AM  
Subject: Crab Fishery Petition

**Comment:**

Dear Ms. Wahl. My name is Orion Ashdown I am a second generation crab fisherman out of Port Orford. As you live in langlois I was wondering if you would come to Port Orford and have a conversation with the fishers about the whale issues as we are going to be the most affected by this situation. Please let me know if you are interested?

Sincerely yours Orion

From: Jordan Balsa  
E-mail: [jordashe411@gmail.com](mailto:jordashe411@gmail.com)  
Sent on: Friday, February 13, 2026 10:48 AM  
Subject: Crab Fishery Petition

**Comment:**

To Whom It May Concern at the [Oregon Department of Fish and Wildlife](#),

I am writing as a concerned community member to express my support for our local fishermen, crabbers, and the coastal communities whose livelihoods and culture are deeply connected to these industries. I respectfully urge the Department to carefully consider the broader impacts before accepting or acting upon petitions that may restrict or limit our fishing community.

Our fishermen are not only providers of food but also stewards of the ocean. They possess generations of knowledge and hands-on experience working within these ecosystems. Many of them actively support conservation efforts, follow regulations, and adapt their practices based on research, seasonal changes, and sustainability goals. Their livelihood depends on the health of our oceans, giving them a strong personal and economic incentive to protect marine life and resources.

I understand and respect the importance of protecting whale populations and marine ecosystems. However, I believe it is equally important to consider available data, research, and collaboration with the fishing community when evaluating claims that fishing practices are causing harm through negligence. Decisions that significantly impact working families and coastal economies should involve balanced, fact-based review and meaningful engagement with those who work on the water daily.

Commercial fishing and crabbing also play a critical role in providing food to communities across the [United States](#). These industries support local economies, sustain multigenerational family businesses, and help ensure access to locally sourced, nutritious seafood. Policies that restrict these industries without clear and comprehensive evidence could have far-reaching consequences for food supply, employment, and the stability of coastal towns.

I respectfully ask that the Department continue to work collaboratively with fishermen, scientists, and community members to pursue solutions that protect marine wildlife while preserving the livelihoods and traditions that sustain our coastal communities.

Thank you for your time, consideration, and continued dedication to responsible wildlife and resource management.

Thank you for your time,  
Jordan and Kido Kravatas  
Brookings OR (Curry County)  
831-251-8188  
[jordashe411@gmail.com](mailto:jordashe411@gmail.com)

From: Brent Winfield  
E-mail: [brentwinfield123@yahoo.com](mailto:brentwinfield123@yahoo.com)>  
Sent on: Friday, February 13, 2026 1:47 PM  
Subject: Crab Fishery Petition

**Comment:**

Brent Winfield  
Owner, Wnfld Fisheries, Inc.  
94116 Airport Ridge Ln.  
North Bend, OR 97459  
541-260-2762  
[brentwinfield123@yahoo.com](mailto:brentwinfield123@yahoo.com)

02-14-2026

Oregon Department of Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

Dear Chair and Members of the Commission,

I am writing regarding the upcoming February 20 meeting and the petition submitted by several environmental organizations requesting additional restrictions on Oregon's commercial Dungeness crab season due to concerns about whale entanglements.

As the owner of Wnfld Fisheries, Inc., and as someone who has worked in this industry for nearly 50 years, I respectfully urge the Commission to deny this petition.

Over the past several years, the commercial fleet has already experienced significant reductions in both season length and allowable gear. These measures have come at substantial economic cost to fishermen, small businesses, and coastal communities that depend on the crab fishery. Additional closures or pot reductions would further threaten the viability of family operations like mine without clear evidence that such measures would meaningfully improve whale protection outcomes

For many of us, this fishery is not simply a business but a way of life that has supported our families for generations. The income from the Dungeness season sustains deckhands, processors, mechanics, fuel

docks, and small coastal towns throughout the winter months when few other opportunities exist. Each additional restriction has ripple effects far beyond the boats themselves.

From decades on the water, I can say with confidence that whale populations off our coast are stronger than at any time in my career. Sightings are more frequent and more widespread than ever before. This suggests that current management practices and broader conservation efforts are working. Imposing further restrictions on our fleet does not reflect the reality we observe on the grounds each day.

Importantly, from what we have consistently seen in the field, much of the entanglement risk appears to come from derelict or abandoned gear already in the water, not actively fished and well-maintained commercial gear. Lost pots and lines that remain unattended pose a far greater long-term hazard to whales and other marine life. Addressing this issue directly would have a more meaningful impact than reducing the number of pots or shortening seasons for active fishermen.

Rather than imposing further restrictions, I encourage the Commission to expand practical solutions such as increasing support for the Oregon Crab Commission's derelict gear retrieval program. Additional funding and incentives would allow larger vessels to participate effectively and safely in grappling for lost pots and removing abandoned gear. Expanding this effort would improve whale safety, reduce marine debris, and provide tangible environmental benefits without further harming the working fleet.

There are also additional constructive measures worth considering. Encouraging or allowing more longlining of pots could reduce the total number of vertical lines in the water. Continued investment in gear innovation and reduced-risk technologies should be prioritized over broad closures.

Further, more comprehensive scientific studies on whale populations and migration patterns would help ensure management decisions are based on accurate data. Improved identification methods, including tagging endangered whales, could provide clearer information about where and when real risks occur and allow for more targeted, real-time management rather than blanket restrictions.

Fishermen themselves can be part of the solution. With proper coordination and training, crews can assist in safely removing gear from whales when entanglements are observed. Years ago, while working on another vessel, I personally helped free whales from gear while cooperating with Greenpeace. That experience reinforced my belief that fishermen and conservation groups share common goals and can work together effectively when practical solutions are supported.

If environmental organizations believe additional reductions are necessary, a voluntary buy-back program would be a more balanced and proven approach. Similar programs have been successfully implemented in the past and could reduce overall effort and eliminate a significant number of vertical lines without forcing remaining family operations out of business. If groups are committed to reducing risk, investing their resources directly into buy-backs would provide measurable results.

Our fleet has consistently demonstrated a willingness to work with regulators, scientists, and conservation partners. We have adopted gear modifications, complied with delayed openings, and participated in retrieval efforts whenever asked. These actions reflect our shared commitment to stewardship. Before layering on additional restrictions, it is important to recognize the substantial steps fishermen have already taken in good faith.

If the Commission's concern is the potential for continued pressure or litigation from advocacy groups, I would respectfully suggest that preemptively cutting our season and gear is not the appropriate solution. Decisions affecting entire industries and communities should rely on targeted, science-based solutions that address actual risk rather than precautionary measures that may not produce meaningful benefits.

We all share the goal of protecting marine life. There are balanced, workable alternatives that should be prioritized before considering further reductions. These approaches protect whales while preserving the economic sustainability of Oregon's crab fleet and the coastal communities that depend on it.

I respectfully ask the Commission to carefully consider the cumulative impacts that additional restrictions would have on fishermen and to deny the petition at the February 20 meeting. Our fleet remains committed to responsible, sustainable fishing practices and to being active partners in conservation.

Thank you for your time, consideration, and service to Oregon's fisheries.

Sincerely,

Brent Winfield  
Owner  
Wnfld Fisheries, Inc.

From: Dianna Delgado  
E-mail: [ddelgado@portofastoria.com](mailto:ddelgado@portofastoria.com)  
Sent on: Friday, February 13, 2026 3:30 PM  
Subject: Crab Fishery Petition

**Comment:**

Dear Members of the Commission,  
On behalf of the Port of Astoria Board of Commissioners, we respectfully submit the attached letter regarding the Petition for Rulemaking for the Oregon Commercial Dungeness Crab Fishery Rules.

Thank you for the opportunity to provide these comments.

Best regards,  
**Dianna Delgado**  
Office Manager  
422 Gateway Ave, Suite 100 • Astoria, OR  
503-741-3300 • [admin@portofastoria.com](mailto:admin@portofastoria.com)



February 13, 2026

Oregon Fish and Wildlife Commission  
c/o Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

Re: Petition for Rulemaking for the Oregon Commercial Dungeness Crab Fishery

Dear Members of the Commission,

On behalf of the Port of Astoria, I am writing to share the importance of the commercial Dungeness crab industry to our community as you consider the petition submitted on December 11, 2025. This fishery has been a foundation of the North Coast economy for generations and remains one of the most important sources of income for working families in our region.

The Dungeness crab fishery is the largest and most valuable commercial fishery in the state of Oregon. Last season, it generated an ex-vessel value of \$96 million across the state before any economic multipliers were applied. For the Port of Astoria, the value of this fishery is substantial. Recent ex-vessel revenues were \$26.1 million during the 2023 to 2024 season, \$26.6 million during the 2024 to 2025 season, and more than \$16 million so far this season with the fishery still active.

These harvests support hundreds of people on the waterfront and far beyond. In Astoria, the crab season drives business for suppliers, gear shops, fuel docks, welders, machine shops, seafood processors, local restaurants, and many other small businesses. The people who work in these industries live here, raise families here, and rely on a stable crab season to get them through the year.

The Port itself is closely tied to the crab fishing industry. Many of these vessels are long time users of Port services and return year after year for haul outs, maintenance, repairs, and inspections. The Port travel lift handles many commercial vessels each season and the revenue generated from this activity helps support the continued operation of our marine facilities. In addition, several of our tenants depend on the crab industry to remain viable. A strong crab season directly supports their ability to stay open and employ local workers.

Because of these deep connections throughout the community, any major reduction in fishing access or any requirement that significantly changes how the fleet operates would affect far more than the vessels on the water. It would ripple through every part of the working waterfront and into the broader



economy of Astoria and the surrounding region. Many small and family-owned boats do not have the financial flexibility to absorb sudden or costly changes. The loss of even a portion of the fleet would directly impact the Port, local businesses, and the people who rely on these jobs.

The Port fully supports efforts to reduce the risk of marine life entanglements, and we understand the importance of responsible fishery management. We also recognize that the industry has already taken meaningful steps to improve safety, reduce risk, and participate in research and monitoring efforts. As you consider new measures, we respectfully ask that the real economic impacts on fishing families and coastal communities be given full consideration. The long-term health of the fishery depends not only on environmental protection but also on the continued viability of those who make their living from the resource.

Thank you for the opportunity to provide these comments. The Port of Astoria remains committed to working with ODFW, the fishing fleet, processors, community partners, and all involved parties to ensure the continued success of this essential Oregon fishery.

Sincerely,

Dirk Rohne  
Commission President  
Port of Astoria

From: Natasha Novikova  
E-mail: [natasha@forseasolutions.com](mailto:natasha@forseasolutions.com)>  
Sent on: Friday, February 13, 2026 5:11 PM  
Subject: Crab Fishery Petition

**Comment:**

Dear Chair and Members of the Oregon Fish and Wildlife Commission,  
Please accept the attached letter as formal public comment from **ForSea Solutions LLC** regarding the proposed amendments to the Oregon commercial Dungeness crab fishery rules.  
ForSea Solutions is a Portland-based fisheries sustainability advisory firm established in 2016. We specialize in Marine Stewardship Council (MSC) assessments, Fishery Improvement Projects (FIPs), and science-based fisheries management advisory services. Our team works internationally with certification bodies, fishery managers, seafood buyers, and fishing industry groups. In Oregon, we have supported the Oregon Dungeness Crab Commission for several years in relation to its Fishery Improvement Project and evaluation against the MSC Fisheries Standard. Our work focuses on technical analysis, documentation, risk review, and stakeholder engagement within internationally recognized sustainability frameworks. We are submitting this comment to provide a technical perspective informed by our experience working at the intersection of fisheries management, certification standards, and market expectations. We recognize the importance of minimizing entanglement risk and supporting effective conservation outcomes. Our attached letter outlines considerations that we hope will assist the Commission in its review process. I plan to attend the February 20, 2026 OFWC meeting and would be willing to speak during public comment if time and space allow.  
Thank you for your time and consideration.  
Best,  
Natasha

**Natasha Novikova**  
Founder and President  
Tel. +1 (971) 331-9612  
e. [natasha@forseasolutions.com](mailto:natasha@forseasolutions.com)  
[www.forseasolutions.com](http://www.forseasolutions.com)



February 13, 2026

Dear Members of the Commission,

My name is Natasha Novikova, and I am the Founder and President of the company ForSea Solutions LLC. My team and I have been working with the Oregon Dungeness Crab Commission (ODCC) for more than five years in support of its Fishery Improvement Program (FIP)<sup>1</sup>. The FIP is designed to enable ODCC to move the Oregon Dungeness Crab fishery towards achieving re-certification against the Marine Stewardship Council fishery sustainability Standard. The Oregon Department of Fish and Wildlife (ODFW) is a key partner in this process. I am submitting this letter in response to the recent Petition on whale entanglement submitted to ODFW by the Center for Biological Diversity, Oceana, NRDC and the American Cetacean Society, and in recognition of the work that is being undertaken within Oregon to manage and mitigate entanglement risks in the Oregon Dungeness Crab fishery.

In this regard, it is recognized that whale entanglement is a serious issue, and recent Oregon-attributed entanglements in 2024–2025 warrant attention and continued adaptive management. Importantly, it is also recognized that Oregon and the fishery are already taking numerous steps to monitor and reduce whale entanglements, and that long-term data indicate that Oregon’s commercial Dungeness Crab fishery is a minor contributor to whale entanglements. At the same time, evidence indicates that humpback whale populations in this region are likely increasing. In this context, we do not believe that the changes requested in the Petition represent the best approach for continued progress managing and reducing whale entanglements.

Current management measures for the Oregon Dungeness Crab fishery already include late-season pot limits and depth restrictions, in-season and post-season derelict gear recovery, taut-line requirements, limiting surface gear, industry education/outreach, training/response capacity, and an Experimental Fishing Gear Permit program. Over the last five years, ODFW’s reports to the Fishery Improvement Project (FIP) have documented ongoing research to better understand overlap between the whales and the fishery to improve avoidance strategies, and ongoing work to implement a comprehensive Conservation Plan to minimize entanglement risk as part of an incidental take permit pathway. We further recognize that ODFW has already convened learning and planning efforts around pop-up (ropeless/on-demand) gear, including an ODFW pop-up gear workshop focused on experimental fishing gear permits and practical implementation issues. That workshop described a program goal of issuing five permits in 2027, potential expansion based on experience, and specific accountability tools.

Best-available science shows Oregon’s fishery is a comparatively small contributor to confirmed West Coast entanglements. The Oregon draft Conservation Plan summarizes NMFS West Coast Region data (2013–2020) showing that only 3.4% of all confirmed coastwide entanglements (2013–2020) were attributed to fishery gear originally set in Oregon. Even when focusing specifically on confirmed commercial Dungeness crab gear entanglements during that same time period, Oregon-attributed

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<sup>1</sup> <https://fisheryprogress.org/fip-profile/14029/overview>

cases remain comparatively low: Oregon crab gear represented 9.2% of those confirmed commercial Dungeness crab gear cases.<sup>2</sup>

The most recent Stock Assessment Report for the California/Oregon/Washington humpback whale stock indicate that the stock abundance is likely increasing<sup>3</sup>. The Conservation Plan lays out the NMFS negligible impact framework (including Single NITs) and provides an NITs calculation for humpback whales at 2.48 whales per year for the Oregon Dungeness crab fishery. The average mortality and serious injury of humpback whales associated with Oregon crab gear (as analyzed in that document) does not exceed that NITs and is unlikely to exceed it even with the higher values from 2024 and 2025 included in the long-term average. The data should be watched closely to ensure there is not a long-term trend of increasing entanglements originating with the Oregon Dungeness crab fishery, but it is apparent that measures to do this monitoring and to act quickly if entanglements do increase over time are already in place with ODFW.

ODCC has been working actively on its FIP to move the Oregon Dungeness crab fishery towards re-certification against the MSC Standard. MSC certification is built around principles that include minimizing environmental impacts and requires ongoing auditing and potential improvements over time. The MSC creates additional requirements but also incentives to manage, monitor, and reduce environmental impacts, including those to endangered, threatened, and protected species.

In summary, given Oregon's ongoing process to manage and mitigate whale entanglements, including the concrete progress being made toward testing pop-up gear through an experimental permitting pathway, the substantial mitigation/monitoring/adaptive-management actions already underway, Oregon's relatively small share of confirmed coastwide entanglements compared with other jurisdictions, the likely increase in the humpback whale population, and the importance of proportionate, data-driven management, I urge the Commission to allow the Oregon Dungeness crab fishery to continue under current regulations at this time.

Please continue the current course of action, with a focus on strengthening implementation of existing measures, maintaining transparent monitoring and adaptive triggers through the Oregon Entanglement Advisory Committee (OEAC) and the Conservation Plan process, and expanding structured pop-up gear trials in a way that is enforceable, safe, and economically realistic for participants.

Sincerely,



Natasha Novikova  
Founder and President  
ForSea Solutions  
[natasha@forseasolutions.com](mailto:natasha@forseasolutions.com)  
Phone: 971-331-9612

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<sup>2</sup> Oregon Department of Fish and Wildlife Marine Resources Program. 2021. Conservation plan for reducing the impact of the Oregon ocean commercial Dungeness crab fishery on ESA-listed species off Oregon.

<sup>3</sup> Carretta, James V; Oleson, Erin M; Forney, Karin A; Muto, Marcia M; Weller, David W; et al. 2021. HUMPBACK WHALE (*Megaptera novaeangliae*): California/Oregon/Washington Stock. In: U.S. PACIFIC MARINE MAMMAL STOCK ASSESSMENTS: 2021 NOAA Fisheries. NOAA-TM-NMFS-SWFSC-663.

From: Kim Creasy  
E-mail: [creasy.kd@gmail.com](mailto:creasy.kd@gmail.com)  
Sent on: Saturday, February 14, 2026 10:06 AM  
Subject: Crab Fishery Petition

**Comment:**

My name is Doug Creasy. I crab a small boat by myself. I began in 1986. I cannot do pop up gear.

Pop up gear has the potential of causing a real mess in the ocean that cannot be recovered. Is there too much gear in the ocean? Yes. Did Patti Burk of ODFW come up with the 142000 pots? Yes. I was in the room.

We live by the rules of ODFW therefore we, the industry and ODFW, can correct ourselves. Not an outside agency.

Pop up gear is too draconian

From: Patrick Magann  
E-mail: [diamondcutterfisheries@gmail.com](mailto:diamondcutterfisheries@gmail.com)  
Sent on: Saturday, February 14, 2026 12:59 PM  
Subject: Crab Fishery Petition

**Comment:**

Hello Commision,

I am a lifelong commercial fisherman with over 20 years of Dungeness crabbing under my knife belt. I have have worked my way up from the canneries in Astoria to some of the bigger and more productive crab boats that eventually enabled me to be able to buy my first house. Last year,after some considerable saving, I purchased a 42 steel crab boat, FV Pacific Breeze. I crewed on a friends boat this year and am in the middle of purchasing my first Oregon Dungeness crab permit, a 200 pot permit. A lifelong goal of mine nearly achieved and i did with a lot of hard work and perseverance. I have no family in the industry and this was not handed to me. I'm just hoping this wasn't all done in vain and that I will be able to use this permit in the near future or are the NGOs going to put us out of business before I have a chance to realize my dreams?

Best Regards,  
Patrick Magann

From: Karie Silva  
E-mail: [jeanettemarrie.93@gmail.com](mailto:jeanettemarrie.93@gmail.com)  
Sent on: Saturday, February 14, 2026 4:46 PM  
Subject: Crab Fishery Petition

**Comment:**

**Oregon Fish and Wildlife Commission**  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

**Re: Petition for Adoption and Amendment of OAR Chapter 635, Division 5 Oregon Fish and Wildlife Commission:**

Dear Madam Chair Wahl and Members of the Oregon Fish and Wildlife Commission,

My husband and I are co-owners of the fishing vessel Jeanette Marrie, homeported in Charleston, Oregon. We have participated in the Oregon Dungeness crab fishery for over 24 years, and these comments reflect our direct operational experience and the realities faced by fishing families working on the water today.

I appreciate the opportunity to provide input on the proposed amendments to multiple Oregon Administrative Rules affecting the Dungeness crab fishery. I share the Commission's commitment to marine conservation and whale entanglement risk reduction. **However, effective management must be grounded in proportional, evidence-based measures that are evaluated before additional regulatory burdens are imposed.**

I write to express opposition to the petition seeking adoption of new rules and amendments to Oregon Administrative Rules Chapter 635, Division 5 as a result of the recent petition. I believe the Oregon Dungeness crab fishery should first be afforded the opportunity to implement and evaluate the regulations already scheduled to take effect in 2026, including the designated state-federal vertical line reduction measures, for the Oregon crab season. These measures are part of a coordinated, three-state approach intended to improve safety and reduce the risk of whale entanglements and should be allowed to proceed and be assessed before additional regulatory changes are considered.

It is unclear how it would be appropriate or feasible to implement new regulations requiring the use of pop-up (on-demand or ropeless) gear while the technology remains in a testing phase. Although field trials and pilot programs have demonstrated that pop-up gear could reduce entanglement risk by eliminating persistent vertical buoy lines during limited fishing activities, the gear has been tested primarily under controlled conditions, at limited scale, and with significant oversight. It has not yet been evaluated under full fleet-wide use or across the range of ocean, weather, and operational conditions typical of the Oregon Dungeness crab fishery.

In addition to technical and economic uncertainties, unresolved safety concerns remain. The absence of surface markers raises navigational and operational risks, including reduced gear visibility to other fishing vessels, enforcement, and emergency responders; increased potential for gear conflicts; and challenges associated with unexpected gear deployment during retrieval. These risks may be amplified in congested fishing areas or adverse conditions and are compounded by reliance on electronic systems for gear location, coordination, and enforcement. Such safety considerations have not yet been fully evaluated at scale.

Further uncertainties persist regarding scalability, operational complexity, and cost. Widespread adoption would require substantial new investments, ongoing maintenance, and new skills related to acoustic coordination and gear management. It is anticipated that full operational conversion to buoy gear would cost well in excess of \$100,000 per vessel. These costs would disproportionately affect smaller and multi-generational fishing operations who are already dealing with rising costs of fuel, bait, insurance, and providing stable income for reliable crew. While pop-up gear has shown reliability in testing, broader implementation presents unresolved operational, economic, enforcement, and safety challenges.

**For these reasons, I respectfully urge the Commission to deny the petition at this time and allow the existing 2026 measures to be implemented and evaluated before considering additional regulatory changes.**

## Addendum A: OAR 635-005-0405 — Compliance Date and Gear Reduction

The petition proposes to move the compliance date from May to April and to impose additional gear reductions earlier in the season. These changes would significantly alter the existing management framework without sufficient justification or evaluation of the economic and operational impacts on the Oregon Dungeness crab fleet.

The Oregon Fish and Wildlife Commission first adopted the current late-season gear reduction and associated whale entanglement risk measures on **September 11, 2020**, effective beginning with the 2020–21 crab season. These regulations included a 20 percent reduction in pot limits and associated tagging and depth restrictions beginning May 1 each year. While these measures are now familiar to the fleet, they have not yet been in place long enough under stable conditions to allow for comprehensive evaluation before additional regulatory changes are considered.

The current May compliance date and associated gear reduction measures were established to address whale entanglement risk during periods of increased whale presence. April has not historically been recognized as a peak period for whale entanglement risk, and advancing the compliance date in regulation represents a precautionary expansion rather than a change grounded in new scientific evidence. A permanent change to the date in regulation also prevents the Agency from maintaining authority to provide flexibility based on changing conditions. As ocean conditions change, increases in biotoxins could push fishery start dates later making April even more critical for vessels that rely on this fishery as primary income, and potentially at no benefit to reducing whale entanglement risk.

The proposed gear reductions would impose significant economic impacts on the fleet. Under the petition, permitted pot limits would be reduced by approximately 40 percent across permit tiers, imposing substantial economic impacts on the fleet. Imposing these reductions one month earlier in the season would place significant financial strain on crabbers and their crews. Early season access is critical for recovering fixed costs, operating during safer weather windows, and maintaining crew safety. Reductions during this period have outsized impacts on smaller operations, shore-based fleets that anchor and support our coastal communities, and multi-generational fishing families.

Repeated regulatory changes at the request of petitioners outside of the fishery with no ties to our communities, before existing measures can be evaluated, or work currently in progress can be implemented, undermine confidence in the management process and make long-term compliance planning increasingly difficult. When rules are frequently modified or expanded without sufficient evaluation, it creates regulatory instability and sends a signal that compliance may never be sufficient. **The Dungeness crab fleet has consistently worked to comply with evolving regulations; however, the cumulative cost of repeated gear modifications and operational changes makes continued compliance increasingly challenging.**

## Addendum B: OAR 635-005-0460(3) Harvest Areas and Conventional Gear Prohibition

As proposed, this provision would make it unlawful for permitted vessels to use conventional crab gear in designated harvest areas beginning in 2028, regardless of whether that gear has been lawfully used for decades and regardless of whether existing risk-reduction measures are already in place. This represents a forced transition to a specific technology rather than a flexible approach to risk mitigation. ODF&W is already in the process of allowing the testing of buoy gear, and this petition prevents that necessary testing period.

Requiring fishermen to abandon fully functional, legally compliant gear and invest in unproven or limited-availability alternatives imposes a substantial and unfunded financial burden on the fleet. For many operations, particularly small, family-owned, and multi-generational vessels, this burden may be insurmountable. The practical effect of this provision would not be adaptation, but displacement.

Mandating exclusive use of pop-up gear on a fixed timeline assumes a level of technological readiness, availability, enforceability, and fleet-wide feasibility that does not yet exist. Until these issues are resolved and existing measures are fully evaluated, this provision is premature and should not be adopted.

#### **Addendum C: OAR 635-005-0401: Unauthorized Take Emergency Procedures**

Emergency rulemaking authority is intended to address immediate, unforeseen risks based on verified events, not modeled projections or precautionary assumptions alone. The petition proposes expanding or clarifying emergency procedures related to unauthorized take without clearly defining the evidentiary threshold that would trigger such action, or how modeled exposure risk would be distinguished from confirmed entanglement events. **By including unauthorized take emergency procedures in their petition, the petitioners disregard the fact that ODFW is already in progress building the necessary conservation plan to work with NMFS to obtain incidental take permits for the fishery under ESA and MMPA. Further, forcing ODFW to take time and resources to address this petition takes those same resources away from their ability to complete the incidental take permit process.**

As discussed further in Addendum D-1, NOAA's stock assessments do not support reliance on modeled exposure risk alone as a basis for emergency regulatory escalation.

Scientific modeling, including estimates of seasonal whale presence, can inform long-term management discussions, but it does not substitute for observed data demonstrating an actual emergency condition. Reliance on modeled risk alone to justify emergency procedures risks blurring the distinction between proactive management and emergency response, potentially resulting in repeated or prolonged restrictions absent documented unauthorized take.

From an operational perspective, emergency closures or gear restrictions imposed without clear, verified triggering criteria create uncertainty for the fleet, complicate compliance, and undermine safe fishing practices. Fishing operations depend on predictable regulatory frameworks to plan gear deployment, crew safety, and economic viability. Gearing up for the season in itself is a substantial investment for family-owned vessels; a shortened season due to a closure potentially in the beginning of the season can have serious financial impacts.

Emergency procedures should remain tightly linked to documented events, transparent thresholds, and timely review to ensure they are proportional, justified, and limited in duration. **Without clear standards for when emergency procedures begin and end, regulated participants are left uncertain whether compliance today will prevent further escalation tomorrow.**

#### **Addendum E: OAR 635-005-0480: Dungeness Crab Conventional Gear Buoy Tag and Gear Marking Requirements**

Gear marking and buoy tag requirements have long been recognized as important tools for identification, accountability, and enforcement within the Dungeness crab fishery. The fleet has demonstrated consistent compliance with these requirements, investing significant time and resources to meet evolving marking standards intended to reduce entanglement risk and improve traceability.

The petition proposes additional changes or expansions to existing gear marking requirements without clearly demonstrating that current measures are inadequate or that further modifications would materially reduce entanglement risk. While improved gear identification may assist post-incident analysis, it does not prevent entanglements from occurring and should not be treated as a substitute for evaluating the effectiveness of existing measures already in place.

From an operational standpoint, repeated changes to buoy tag and gear marking requirements impose cumulative costs on fishing operations, including material expenses, labor time, and logistical coordination, particularly for

small and multi-generational operations. These costs are borne regardless of whether entanglement events occur and without corresponding evidence that each successive change meaningfully improves outcomes.

Effective management requires periodic assessment of whether additional requirements produce measurable benefits relative to their cost and complexity. Without such evaluation, incremental rule changes risk creating a regulatory ratchet in which compliance becomes progressively more burdensome while the practical gains become increasingly marginal. At some point, adding further requirements without demonstrated necessity, simply because outside environmental organizations that fund themselves by taking legal action against agencies request these requirements, undermines confidence in the management process rather than strengthening it. As commercial fishing families, we want to maintain strong partnerships with our fishery managers and collaborate on actions based on science that provide benefits.

We believe current gear marking requirements are sufficient, enforceable, and clearly justified by documented need. Any proposed modifications should be supported by evidence that existing measures are insufficient and that the proposed changes would result in demonstrable, measurable improvements in conservation outcomes, not because national organizations tell us to.

The following addendums address the petition's broader reliance on scientific modeling and transparency requirements that underpin all proposed changes.

#### **Addendum D: Entanglement Transparency, Accountability, and Best Available Science (ORS 183.325; ORS 183.335; ORS 183.400)**

The petition relies heavily on modeled estimates of whale exposure to Dungeness crab gear, including findings from Derville et al. (2023), which suggest increased potential exposure during spring months, particularly around April. While such modeling may provide useful context for understanding seasonal whale presence, modeled exposure does not equate to observed entanglement events, nor does it substitute for empirical evidence of fishery-attributable serious injury or mortality. The petition's reliance on these models to justify earlier compliance dates and other escalations therefore outpaces the available observed data and does not meet the threshold for immediate additional restrictions.

For example, the petition quotes Derville et al. (2023) as noting that the “seasonality of Dungeness crab fishing and orca whale migration coincides with a peak of exposure around the month of April” (Petition, p. 29), but the study itself describes its analysis as assessing “co-occurrence between commercial Dungeness crab fishing gear and whales over a decade (2011–2020) as an indicator of exposure to entanglement risk” (Derville et al. 2023, abstract). This framing underscores that the findings are predictive indicators of potential risk based on spatial overlap, not direct measurements of confirmed entanglements or attributable take.

Transparency and accountability measures should be grounded in observed outcomes and verifiable data. Effective management depends on how regulations perform under real-world fishing conditions, including compliance, safety constraints, weather variability, and cumulative operational impacts. Advancing timelines or imposing additional requirements based primarily on modeled exposure risk at the request of outside groups risks outpacing practical implementation and undermining compliance, at the potential cost of our working waterfronts and coastal communities.

Consistent with Oregon’s Administrative Procedures Act, rulemaking must be supported by substantial evidence and a rational connection between the facts relied upon and the actions proposed. NOAA’s Marine Mammal Stock Assessment Reports constitute the primary federal scientific framework for evaluating marine mammal population status, stock structure, and fishery-related serious injury and mortality. These assessments document a sustained and substantial recovery of humpback whale populations using U.S. West Coast waters since the end of commercial whaling, reflecting decades of successful conservation under existing statutory and regulatory regimes. **It makes sense that larger whale populations could increase interactions with gear, but that does not mean that there is sufficient evidence to indicate that there is a problem.**

NOAA reports indicate that West Coast humpback whale populations are growing around 8% annually (NOAA Fisheries, 2021 Humpback Whale CA/OR/WA Stock Assessment Report, supported by related summaries), contributing to increased sightings and potential overlap but also demonstrating the effectiveness of post-whaling protections.

Importantly, NOAA does not interpret population recovery as evidence of regulatory failure, nor does it conclude that increased abundance alone warrants accelerated compliance timelines, deeper early-season gear reductions, expanded emergency authority, or mandatory transitions to specific fishing technologies. NOAA's stock assessment process distinguishes clearly between population abundance trends and observed serious injury or mortality attributable to specific fisheries. Regulatory significance under this framework is tied to documented events and verified take, not modeled exposure or whale presence alone.

For instance, NOAA notes that "pot and trap fishery entanglements are the most frequently-documented source of serious injury and mortality of humpback whales in U.S. west coast waters" (NOAA Fisheries, 2021 Humpback Whale CA/OR/WA Stock Assessment Report, p. 2), but these are based on confirmed cases, with estimates acknowledging that "most entanglements go unobserved" and true numbers "may be five times as high as reported" (Petition, p. 22, citing NOAA data). This highlights the need for verified, attributable data to determine if a threat to the sustainability of whale populations exists, rather than modeled projections to drive escalation of regulated procedures.

NOAA's stock assessments do not identify April as a historically verified peak period for fishery-attributable humpback whale entanglements, nor do they recommend advancing compliance dates or escalating restrictions absent documented evidence that existing or pending measures are insufficient. **Reliance on modeled projections without corroborating observed outcomes risks conflating conservation success with regulatory inadequacy.**

**Taken together, the best available science does not establish that current or pending Dungeness crab management measures have failed or that additional regulatory escalation is necessary at this time.** Consistent with ORS 183.325, ORS 183.335, and ORS 183.400, the appropriate course is to implement and evaluate the measures already adopted for the 2026 season before considering further restrictions. Regulatory transparency and accountability are best achieved through measured, adaptive management informed by verified outcomes, rather than precautionary expansion based primarily on modeled exposure risk.

#### **Addendum D-1: Application of Best Available Science — NOAA Stock Assessments and Modeled Exposure Risk**

This addendum applies the legal and scientific standards described in Addendum D to the specific evidence relied upon in the petition, including NOAA Marine Mammal Stock Assessment Reports (SARs) and the modeled exposure analysis presented in Derville et al. (2023). The purpose of this addendum is to clarify where the petition's proposed regulatory actions extend beyond what the best available science supports.

The petition relies on this modeled exposure analysis to justify earlier compliance timelines, expanded emergency authority, and mandatory prohibitions on conventional gear. In doing so, the petition treats modeled exposure risk as functionally equivalent to documented take and converts population recovery into evidence of regulatory inadequacy. These conclusions are not drawn by NOAA and are not supported by Derville et al. The petition thus advances misguided policy outcomes from outside organizations that exceed what either source concludes or recommends.

Consistent with the best available science and principles of reasoned rulemaking, the appropriate course is to implement and evaluate the measures already adopted for the 2026 season, and allow ODFW to continue the conservation plan and incidental take permit process, before considering additional restrictions. The petition's proposed expansions go beyond precaution and enter into mandates that are premature, unsupported by the evidentiary record, and inconsistent with NOAA's scientific framework.

As a permitted participant in the Oregon Dungeness crab fishery, I am already preparing to comply with multiple regulatory measures scheduled to take effect beginning in 2026. These measures were developed through a coordinated, multi-state process and have not yet been implemented or evaluated under stable operating conditions. Imposing additional requirements before assessing the effectiveness of existing rules risks regulatory escalation without the benefit of observed outcomes.

**I am not asking the Commission to abandon conservation goals.** I am simply asking that regulatory decisions be grounded in the best available science, evaluated in full context, and applied proportionally in collaboration with stakeholders rather than outside groups. The scientific record, including documented humpback whale population recovery, supports a measured approach that allows existing regulations to be implemented and assessed before further changes are considered.

The provisions in this petition go beyond precaution and enter into mandates that are not yet supported by evidence, feasibility, or evaluation of existing rules. In particular, expansions of emergency authority, early gear reductions, and prohibitions on conventional gear by 2028 warrant denial as proposed. A sufficient pause for evaluating a peer-reviewed report on current measures would better serve both conservation and the long-term viability of the fishery.

I am asking it to distinguish between provisions that require refinement and those that should not proceed at this time because they are premature, unsupported, or unworkable in practice.

The current measures have not been in place long enough to allow for meaningful assessment of their effectiveness. **For these reasons, I respectfully urge the Commission to deny this petition as I have expressed in the Addendums above, allowing the current regulations to be implemented and evaluated before considering additional changes to the rules.**

Respectfully submitted,  
Karie Silva  
jeanettemarrie.93@gmail.com  
Charleston, Oregon

From: Bruce McHenry  
E-mail: [fishkicker544@gmail.com](mailto:fishkicker544@gmail.com)  
Sent on: Sunday, February 14, 2026 7:55 PM  
Subject: Crab Fishery Petition

**Comment:**

Hello good afternoon, My name is Bruce McHenry. Owner/ operator F/V Little J and Western Hunter. 2nd generation fisherman. I've been a Commercial fisherman since I was a child and my father before me left home at 16 to pursue a life in Commercial fishing. Crabbing has been the heart of our operation as long as I've known. Other fisheries being fillers to make it through to another crab season. My boat being a smaller vessel relies a large part on the late season fishery. The late season being pushed back to april 1 puts us at risk stacking out in March when weather is worse. This not only puts us and our crews in jeopardy but will also lead to lost and abandoned gear due to the fact that worse weather and stronger currents make it harder for us to find our pots. The ropeless gear idea would be nothing short of a death sentence for us smaller vessels. My boat is 36' and is not capable of stacking pots while running gear. Something that is required to longline pots with popup gear. My boat is far from the smallest boat in the fleet. We have Oregon permit holders fishing from Dorys. Small skiffs. I of course detest the idea of this entire list of demands that have been placed on us with what I feel to be an absolute lack of proof and scientific data. Please Strongly consider rejecting these demands entirely and save hundreds of small coastal family businesses from unnecessary hardships.

Thank you for your time  
Sincerely, Bruce McHenry F/V Little J Member OCCA.

From: Alycia Jaconson  
E-mail: [alycia\\_jacobson@hotmail.com](mailto:alycia_jacobson@hotmail.com)>  
Sent on: Sunday, February 15, 2026 7:16 AM  
Subject: Crab Fishery Petition

**Comment:**

Attached is my letter in regard to the petition put forth for February 20th. Please read and consider.

Thank you,

Alycia Jacobson

To whom it may concern,

My name is Alycia Jacobson. I have lived in the costal town of Brookings Oregon for 33 years. Our town is one that thrives and survives based off the timber and fishing industries. Without those industries and the jobs and revenue that they generate our town's economy would collapse. Personally, as a business owner in Brookings, I know of numerous fisherman that are customers and help support the success of my business. If the purposed changes in the commercial Dungeness crab fishery rules go into place they could effectively cause many crab fisherman to go out of business. If they can't continue to fish in our area, then they may be forced to relocate which would have a negative impact on the economy in our small town.

On a more personal level I know many families that would be affected if you accepted the petition to modify the commercial Dungeness crab fishery rules. The commercial Dungeness crab fishery is a part of my family's income as my partner owns and operates a commercial Dungeness crab boat. All my brother in-laws also own or operate a commercial Dungeness crab boat. My business partners family is also supported by the industry as her partner is also a crab fisherman. The list goes on and on. We are a small community, and the commercial crab industry is a huge part of it.

For the sake of our crab fisherman, small businesses, families, and community I urge you to deny this petition to modify the commercial Dungeness crab fishery rules.

Thank you,

Alycia Jacobson

From: Season Long  
E-mail: [fvlongshot@gmail.com](mailto:fvlongshot@gmail.com)  
Sent on: Sunday, February 15, 2026 8:45 AM  
Subject: Crab Fishery Petition

**Comment:**

Dear Commission,

My name is **James Long**, and I am writing to provide public comment regarding the December 11, 2025 petition requesting substantial changes to Oregon's commercial Dungeness crab fishery regulations.

Thank you for the opportunity to provide public comments.

Sincerely,

James Long

Owner, Longshot Inc.

Home Port: Chinook, WA

Oregon Dungeness Crab Permit Holder

**Oregon Fish and Wildlife Commission**

4034 Fairview Industrial Drive SE

Salem, OR 97302

**Re: Submission Regarding December 11, 2025 Petition – For Review and Inclusion in the Public Record**

My name is **James Long**, and I am writing to provide public comment regarding the December 11, 2025 petition requesting substantial changes to Oregon's commercial Dungeness crab fishery regulations.

I am a **third-generation commercial fisherman** and the owner of **Longshot Inc.** My home port is **Chinook, Washington**, and I hold an **Oregon Dungeness crab permit with a 500-pot limit.**

Commercial crabbing is not only my livelihood, but a multi-generational family business that supports my crew and contributes directly to the coastal economy.

If the proposed restrictions outlined in this petition are approved, they would significantly impact my ability to operate. Prohibiting conventional pot gear after April 1 would eliminate a large portion of the traditional crab season, including months when prices are often strongest. This impact is especially severe in years when the season starts late, as has occurred in the past, with openings delayed from the traditional December 1 start to as late as February 1. In those years, an April 1 gear prohibition effectively removes much of the remaining opportunity to make a viable season.

In addition, these proposed changes would occur **mid-season**, after fishermen have already made substantial financial commitments. When I purchased my crab pot tags in the fall, I did so with the clear understanding that I would be able to fish those pots through **May 1**, consistent with existing regulations. Reducing pot allowances, requiring additional or replacement tags, and eliminating fishing opportunities, for some, after April 1 fundamentally changes the rules after investments have already been made. These costs cannot be recovered and place an unfair financial burden on fishermen who planned and operated in good faith under the current regulatory framework.

Further, the proposed pot reductions, depth restrictions, and mandatory transition to pop-up gear would sharply reduce fishing efficiency while dramatically increasing operational complexity and costs. These measures would make it far more difficult to safely and economically operate, particularly for small and mid-sized vessels.

From a business standpoint, these changes would result in substantial economic losses. A shortened season alone would reduce my annual revenue by a significant margin. Mandatory conversion to pop-up gear would require a major capital investment that could easily reach tens of thousands of dollars, with no guarantee that the gear would be effective or workable in Oregon conditions. Combined with reduced catch opportunities, these costs would directly affect my ability to maintain my vessel, pay my crew, and continue operating at a viable level.

Beyond my own operation, these restrictions would have broader consequences for ports, processors, and coastal communities throughout Oregon. Reduced landings mean less work for processors, fewer deliveries for suppliers, lower fuel and maintenance sales, and declining economic activity in port towns that rely on crab fishery as a primary economic driver. The cumulative effect would weaken supply chains and place additional strain on already vulnerable working waterfronts.

Oregon's Dungeness crab fishermen have demonstrated a strong commitment to conservation and have already implemented meaningful measures to reduce whale entanglement risk. I support reasonable, science-based solutions developed through established regulatory processes. However, the measures proposed in this petition go far beyond what is feasible and threaten the long-term viability of fishermen, families, and businesses who depend on this fishery.

For these reasons, I respectfully urge the Commission to **deny this petition** and continue addressing conservation concerns through existing management frameworks that balance marine mammal protection with the economic realities of Oregon's Commercial Dungeness crab industry.

Thank you for the opportunity to provide public comments.

Sincerely,

James Long

Owner, Longshot Inc.  
Home Port: Chinook, WA  
Oregon Dungeness Crab Permit Holder

From: Jim Long  
E-mail: [jlong.crcfa@gmail.com](mailto:jlong.crcfa@gmail.com)  
Sent on: Sunday, February 15, 2026 9:03 AM  
Subject: Crab Fishery Petition

**Comment:**

Dear Chair and Members of the Commission,

Please find attached the Columbia River Crab Fishermen's Association's public comment regarding the December 11, 2025 petition affecting Oregon's commercial Dungeness crab fishery.

Thank you for your time and consideration.

Respectfully,  
James Long  
Board Member / CRCFA Representative

**Oregon Fish and Wildlife Commission**  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

**Re: Public Comment Regarding December 11, 2025 Petition – Oregon Commercial Dungeness Crab Fishery**

Dear Chair and Members of the Commission,

The Columbia River Crab Fishermen's Association (CRCFA) respectfully submits this public comment regarding the December 11, 2025 petition requesting substantial changes to Oregon's commercial Dungeness crab fishery regulations.

CRCFA represents commercial Dungeness crab fishermen operating throughout the Pacific Northwest. Our members rely on a stable, predictable regulatory framework to safely operate their vessels, employ crews, and sustain coastal economies in Oregon and neighboring states. The measures proposed in this petition would significantly disrupt fishing operations and pose a serious threat to the economic viability of the commercial Dungeness crab fleet.

Prohibiting conventional pot gear after April 1 would remove a critical portion of the fishing season and is inconsistent with the historical reality of Oregon's crab fishery. Season delays due to crab quality issues, domoic acid events, whale entanglement concerns, and market conditions are not anomalies—they are recurring features of the fishery. Since the mid-2000s, numerous seasons have opened well after the

traditional December 1 start date, with several not opening fully until January or February. In these years, April and May function as essential recovery months that allow fishermen to offset lost fishing opportunity earlier in the season.

Statewide landing data demonstrates that April–May ex-vessel value consistently represents a substantial share of annual revenue, amounting to millions of dollars even in seasons with delayed openings. An April 1 prohibition on conventional gear would therefore eliminate a disproportionate share of the fleet’s earning potential, particularly in years already constrained by regulatory or environmental delays beyond fishermen’s control. (*Source: Oregon Department of Fish and Wildlife commercial Dungeness crab season history and landings data, 2004–2025.*)

CRCFA is particularly concerned that these changes would be imposed mid-season, after fishermen have already made substantial, irreversible financial commitments. Pot tags are purchased, gear is built and deployed, crews are hired, and operational decisions are made based on existing regulations that currently allow fishing through May 1. Reducing pot allowances, requiring additional or replacement tags, and eliminating fishing opportunity after April 1 fundamentally alters the regulatory framework after investments have been made in good faith. These sunk costs cannot be recovered and create an inequitable financial burden on permit holders.

The proposed pot reductions, depth restrictions, and mandatory transition to pop-up gear would further compound these impacts. Collectively, these measures would sharply reduce fishing efficiency while significantly increasing operational complexity, safety risk, and cost. Mandatory conversion to pop-up gear represents a major capital investment—potentially tens of thousands of dollars per vessel—without demonstrated effectiveness or reliability under Oregon fishing conditions, particularly for small and mid-sized vessels.

The economic consequences of these measures would extend well beyond individual fishing operations. Reduced April and May landings would directly affect processors, fuel docks, gear suppliers, vessel repair facilities, and port communities that depend on the Dungeness crab fishery as a primary economic driver. The cumulative impact would weaken supply chains, reduce employment, and place additional strain on already vulnerable working waterfronts throughout Oregon.

CRCFA recognizes the importance of marine mammal protection and supports reasonable, science-based solutions developed through established regulatory processes. Oregon’s Dungeness crab fishermen have already demonstrated a strong commitment to conservation and have implemented meaningful measures to reduce whale entanglement risk. However, the measures proposed in this petition are disproportionate, infeasible at scale, and fail to account for both the documented variability of the crab season and the economic importance of late-season fishing opportunity.

For these reasons, CRCFA respectfully urges the Commission to deny this petition and to continue addressing conservation concerns through existing management frameworks that balance marine mammal protection with the operational and economic realities of Oregon’s commercial Dungeness crab industry. Thank you for the opportunity to provide public comments.

Respectfully submitted,

**James Long**

Board Member / CRCFA Representative

From: Port Orford Fisherman  
E-mail: [portorfordseafood@gmail.com](mailto:portorfordseafood@gmail.com)>  
Sent on: Tuesday, February 15, 2026 10:02 AM  
Subject: Crab Fishery Petition

**Comment:**

Members of the ODFW Commission,

Please accept this letter from the Port Orford Seafood Market Fishermen's Cooperative regarding the petition to revise the commercial Dungeness crab fishery rules. We appreciate this opportunity to comment.  
Yours,

Phillip Russum – F/V Crystal Sea  
Aaron McKenzie - F/V Lynoma  
Nick Bordelon – F/V Lacie Belle  
Tom Butterbaugh – F/V Good News  
Calvin Prinkey – F/V New Mohay  
Wilson Thompson – F/V Fantasy  
James Jennings – F/V My Girl  
Tom Calvanese, Member/Organizer



February 15, 2026

To the Oregon Fish and Wildlife Commission,

On behalf of the Port Orford Seafood Market, a fishermen's cooperative representing eight fishing families in Port Orford, we submit these comments on the petition to amend Oregon Administrative Rules Chapter 635, Division 5, concerning the commercial Dungeness crab fishery. Four of our eight member-owners are active commercial Dungeness crab permit holders who depend on this fishery for the majority of their annual fishing income. We share the Commission's commitment to protecting marine mammals while supporting the long-term viability of Oregon's coastal fishing communities. However, the proposed regulations would impose severe and potentially irreversible economic harm on Port Orford's small-vessel fishing fleet without adequate consideration of alternatives or demonstrated conservation benefit.

### **Port Orford Small-Vessel Fleet Characteristics and Disproportionate Impacts**

Port Orford's commercial fishing fleet operates under unique constraints that make our fishermen particularly vulnerable to the proposed restrictions. Our member-owners fish from vessels averaging significantly smaller than the statewide fleet, with most operating boats under 40 feet in length. These vessel size limitations, combined with Port Orford's exposed ocean access and limited winter weather windows, restrict our fleet to nearshore crabbing grounds.

The proposed regulations would have disproportionate negative effects on small-vessel operators:

**1. DEPTH RESTRICTIONS:** The proposed 30-fathom depth restriction (compared to the current 40-fathom limit) would eliminate a substantial portion of the productive crab grounds accessible to our small vessels. Our boats lack the size, stability, and capability to safely fish deeper offshore waters, particularly during the challenging weather conditions common during late season (April-August). This restriction effectively eliminates much of our fishable area.

**2. POT REDUCTIONS:** The proposed 60% pot reduction (from current 80% allocation) would cut late-season fishing capacity dramatically. For a member with a 300-pot allocation, this means fishing only 180 pots during late season instead of the current 240 pots—a 25% reduction in gear. For a 200-pot permit holder, the reduction from 160 pots to 120 pots represents the same percentage cut. Small operators cannot absorb these reductions as easily as larger operations with more diverse revenue streams.

**3. COMPRESSED FISHING AREAS:** Combining shallow-water restrictions with reduced pot limits forces our entire small-vessel fleet into a limited geographic area. This creates dangerous vessel congestion, increases gear conflicts, and elevates collision risks—particularly during periods of marginal weather when fishing windows are already limited.

**4. ECONOMIC CONCENTRATION:** Unlike larger ports with diverse fishing opportunities, Port Orford fishermen face limited alternatives. Our members participate in multiple fisheries (black cod, salmon, albacore, rockfish, tuna), but the Dungeness crab fishery provides the economic foundation that makes year-round fishing operations viable. Severe restrictions on crab fishing threaten the overall economic sustainability of our small, multi-fishery operations.

### **Direct Economic Impacts on Fishing Families**

Our member-owners are not corporate operations or large fishing companies. We are working families whose livelihoods depend directly on access to Oregon's fishery resources. Four of our eight members hold commercial Dungeness crab permits and rely on crab fishing for 50-70% of their annual fishing income. The proposed restrictions would create immediate financial hardship:

**1. REDUCED LATE-SEASON REVENUE:** The late-season period (April-August) historically provides critical income during months when other fisheries are closed or less productive. The combination of 40% pot reduction and 30-fathom depth restriction could reduce late-season crab revenue by 50% or more for small-vessel operators unable to access deeper waters.

**2. MULTI-FISHERY VIABILITY THREATENED:** Port Orford fishermen maintain year-round operations by participating in multiple seasonal fisheries. Fixed costs (vessel payments, insurance, moorage, maintenance, gear investment) remain constant regardless of fishing income. Severe reductions in crab revenue may force some operators to exit the fishery entirely, undermining the economic foundation that supports participation in other fisheries.

**3. INABILITY TO ABSORB LOSSES:** Our member-owners operate on narrow margins with limited financial reserves. We cannot absorb 30-50% revenue reductions from our primary fishery. Unlike larger operations or corporate fishing companies, we have no access to alternative capital sources or ability to diversify geographically.

**4. GEAR INVESTMENT LOSSES:** Our members have invested heavily in Dungeness crab gear, including pots, lines, buoys, and associated equipment meeting all current regulatory requirements including recent line-marking mandates. The proposed rapid transition to mandatory pop-up gear by 2028 would make these investments obsolete with no compensation or transition assistance.

### **Emergency Closure Triggers and Attribution Concerns**

The proposed emergency closure provisions create untenable uncertainty for fishing families who must plan vessel operations, make gear investments, and manage household finances based on expected fishing opportunities. The petition proposes fishery closures triggered by single entanglement events, yet the petition's own documentation reveals critical attribution problems:

According to the Fleet Advisory of December 5, 2025, two of the four confirmed 2025 entanglements involved or were strongly suspected to involve derelict gear—gear no longer being actively fished. The September 26 case was confirmed as derelict gear. This demonstrates that entanglement risk persists from abandoned or lost gear, yet the proposed emergency closure triggers would shut down active fishing operations based on entanglements potentially caused by gear from prior seasons or even other fisheries.

For small fishing operations, a single-incident closure triggered in April would effectively eliminate the entire productive late season. This creates permanent economic losses for fishing families based on incidents that may have no connection to active fishing operations. Our member-owners have consistently followed all best practices for gear management, yet would face immediate loss of livelihood based on attribution standards that appear inadequate to distinguish active fishing from derelict gear problems.

The proposed rule provides no timeline for investigation, no opportunity for affected fishermen to present evidence about gear management practices, and no mechanism for lifting closures once implemented. This lack of due process is fundamentally unfair to fishing families who have complied with all existing regulations and invested in required gear modifications.

## **Pop-up Gear: Economic Barriers and Inadequate Timeline for Small Operators**

While we support research into alternative fishing gear and are willing to participate in Oregon-based field trials, the proposed timeline for mandatory pop-up gear adoption is wholly unrealistic for small fishing operations and would create insurmountable economic barriers.

**COST BARRIERS:** Based on the California trials cited in the petition, pop-up gear systems cost significantly more than conventional gear. For our member-owners with 200-300 pot allocations, complete gear conversion could cost tens of thousands of dollars—representing multiple years of profit from crab fishing. Small operators have no access to capital for such conversions, particularly when these mandatory requirements come with no financial assistance program.

**VESSEL COMPATIBILITY CONCERNS:** Pop-up gear requires electronic tracking systems, enhanced navigation equipment, reliable GPS/satellite coverage, and specialized deck handling equipment. Many of our small vessels lack the electrical systems, deck space, and equipment capacity to support these requirements. Vessel modifications to accommodate pop-up gear could require extensive and expensive retrofits—costs that small operators cannot bear.

**INADEQUATE TESTING TIMELINE:** The petition proposes mandatory pop-up gear during late season beginning April 1, 2028—just two years away. This timeline allows no time for:

- Completion of Oregon-specific field trials in our oceanographic conditions
- Testing with small vessels operating from exposed ports like Port Orford
- Development of approved gear systems and standardized equipment
- Training programs for fishermen and support infrastructure
- Financial assistance programs to help small operators transition
- Assessment of gear reliability and recovery protocols for equipment failures

The California trials cited in the petition involved different oceanographic conditions, different vessel types, and substantial financial support. Success in California does not demonstrate that pop-up gear will be economically viable or operationally reliable for Oregon's small-vessel fleet operating from exposed coastal ports under challenging conditions.

## **Port Orford Fleet's Demonstrated Conservation Leadership**

Port Orford fishermen have a long and documented history of conservation leadership and scientific collaboration. Our fleet's conservation credentials include:

**1. REDFISH ROCKS MARINE RESERVE COMPLIANCE:** Port Orford commercial fishermen supported creation of the Redfish Rocks Marine Reserve and have maintained 100% compliance with fishing prohibitions within the reserve since its establishment. This represents voluntary sacrifice of productive fishing grounds in support of marine conservation and fisheries research.

**2. SCIENTIFIC RESEARCH PARTICIPATION:** Our member-owners have actively participated in collaborative fisheries research projects, including:

- Ocean acidification monitoring and sample collection
- Fisheries-independent stock assessment surveys
- Habitat mapping and marine ecosystem research
- Sea urchin removal and kelp forest restoration efforts through the Oregon Kelp Alliance
- Data collection on ocean conditions and catch composition

**3. BEST PRACTICES COMPLIANCE:** Our members have consistently followed all crab fishing best practices to minimize entanglement risk, including:

- Removing gear when not actively fishing
- Using minimum scope necessary for conditions
- Maintaining gear in good working condition with clear markings
- Avoiding areas with observed whale activity
- Participating in derelict gear recovery efforts
- Complying with all line-marking requirements

**4. COMMUNITY-BASED CONSERVATION:** Port Orford developed the first community-based marine reserve in Oregon, demonstrating our commitment to balancing fishing activity with ecosystem protection. Our fishermen have repeatedly shown willingness to modify practices and support conservation when approached collaboratively with adequate scientific justification.

This track record demonstrates that Port Orford fishermen respond positively to science-based conservation measures developed through collaborative processes. However, the proposed regulations appear to proceed from unfounded assumptions about fishermen's willingness to adopt conservation practices, rather than building on our documented history of leadership and compliance.

#### **Willingness to Participate in Research-Based Alternative Approaches**

Rather than implementing severe restrictions based on incomplete information and uncertain attribution, we respectfully urge the Commission to pursue research-based approaches that allow adequate testing and validation before mandating major operational changes. Port Orford Seafood Market member-owners are willing to participate in the following alternative approaches:

**1. OREGON-SPECIFIC POP-UP GEAR TRIALS:** We volunteer to participate in properly designed field trials of pop-up gear operating from Port Orford under actual fishing conditions. These trials should include:

- Small vessels representative of Oregon's diverse fleet
- Operations in Oregon's oceanographic and weather conditions
- Economic viability assessment including gear costs, reliability, and catch efficiency
- Safety evaluation and emergency recovery protocols
- Adequate trial period (minimum 2-3 seasons) before any mandate consideration

**2. ENHANCED DERELICT GEAR RECOVERY:** Given that confirmed derelict gear contributed to documented entanglements, we support expanded derelict gear recovery efforts with adequate compensation for fishermen who retrieve abandoned gear. This directly addresses a demonstrated source of entanglement risk without eliminating fishing opportunity.

**3. DYNAMIC MANAGEMENT WITH REAL-TIME DATA:** We support implementation of whale alert systems that provide real-time notifications of whale concentrations, allowing fishermen to voluntarily relocate gear from high-risk areas. This approach targets actual risk periods rather than imposing blanket restrictions regardless of whale presence.

**4. VOLUNTARY INCENTIVE PROGRAMS:** Create voluntary programs where fishermen adopting certified alternative gear receive benefits such as:

- Extended season access or exemptions from certain restrictions
- Cost-share funding for gear acquisition and vessel modifications
- Priority access to limited fishing opportunities
- Technical training and ongoing support

This approach encourages innovation while maintaining conventional gear viability during testing phases.

**5. COLLABORATIVE RESEARCH ON GEAR TENDING AND SOAK TIME:** Research the relationship between gear tending frequency, soak time, and entanglement risk. More frequent gear checks may reduce entanglement risk while maintaining fishing opportunity. Port Orford fishermen would participate in such research.

6. TARGETED SPATIAL OR TEMPORAL MEASURES: Rather than statewide restrictions, implement measures targeting specific high-risk areas or time periods based on documented whale presence data. Port Orford's nearshore small-vessel fishery may have different risk profiles than deeper-water operations in other areas.

These approaches would allow the Commission to make informed decisions based on actual data from Oregon fisheries rather than proceeding from assumptions that may not reflect Oregon's specific circumstances, fleet characteristics, or oceanographic conditions.

### Conclusion and Specific Requests

Port Orford Seafood Market member-owners are conservation-minded fishermen who have demonstrated willingness to support marine ecosystem protection through our actions, not just words. We share the Commission's goal of preventing whale entanglements while maintaining sustainable fisheries. However, the proposed regulations would impose severe economic hardship on fishing families without adequate scientific justification, proper attribution standards, or consideration of less destructive alternatives.

Specifically, we request that the Commission:

1. REJECT the proposed emergency closure triggers as written. At minimum, revise them to:
  - Require rigorous attribution distinguishing active fishing from derelict gear before any closure
  - Distinguish between gear types and fisheries in attribution
  - Include due process protections allowing affected fishermen to present evidence
  - Establish clear criteria for closure review and potential lifting
  - Provide adequate advance notice to allow gear retrieval
  
2. REJECT the proposed 2028 ban on conventional gear during late season, recognizing that:
  - Insufficient time exists for adequate Oregon-specific testing and validation
  - No financial assistance program exists to help small operators transition
  - Economic impacts on small fishing operations have not been assessed
  - Vessel compatibility and safety concerns have not been addressed
  - Alternative approaches have not been adequately tested

3. MODIFY depth restrictions and pot reductions to account for small-vessel fleet characteristics:
  - Maintain 40-fathom depth contour recognizing small vessels cannot safely access deeper waters
  - Retain current 80% pot reduction rather than proposed 60%
  - Allow regional or vessel-size-based flexibility
  - Consider tiered approach based on documented whale presence
  
4. COMMISSION independent economic analysis examining:
  - Impacts on small-vessel operators and fishing families
  - Effects on multi-fishery operations that depend on crab fishing as economic foundation
  - Disproportionate impacts on small ports and rural fishing communities
  - Cumulative effects of recent regulatory changes on fishing viability
  - Alternative livelihoods available to displaced fishermen
  
5. ESTABLISH a collaborative research program including:
  - Oregon-specific pop-up gear trials with small-vessel participation
  - Economic viability assessment for alternative gear
  - Enhanced derelict gear recovery with fisher participation
  - Real-time whale monitoring and dynamic management testing
  - Adequate timeline (3-5 years minimum) before any mandate consideration
  
6. CREATE a meaningful stakeholder process that includes:
  - Direct participation by affected fishermen, not just industry representatives
  - Consideration of alternatives before implementing severe restrictions
  - Adequate time for review and comment on specific proposals
  - Transparency in decision-making and attribution determinations
  - Recognition of fishing communities' conservation track record

Port Orford fishermen have demonstrated our commitment to conservation and our willingness to participate in collaborative solutions. We have complied with marine reserves, participated in research, adopted best practices, and supported science-based management. We ask only that the Commission extend the same commitment to science-based decision-making by pursuing adequate research and testing before implementing regulations that would eliminate our livelihoods.

The proposed regulations appear to proceed from assumptions rather than demonstrated facts specific to Oregon fisheries. We respectfully request the opportunity to participate in research that would provide the Commission with actual data on which to base informed decisions—decisions that could achieve conservation goals without destroying small fishing operations that have been the backbone of Oregon coastal communities for generations.

We appreciate the Commission's consideration of these comments and stand ready to participate in collaborative research and solution development.

Respectfully submitted,

Port Orford Seafood Market member-owners:

Phillip Russum – F/V Crystal Sea  
Aaron McKenzie - F/V Lynoma  
Nick Bordelon – F/V Lacie Belle  
Tom Butterbaugh – F/V Good News  
Calvin Prinkey – F/V New Mohay  
Wilson Thompson – F/V Fantasy  
James Jennings – F/V My Girl  
Tom Calvanese, Member/Organizer

From: Zan Bode  
E-mail: [zanbode@gmail.com](mailto:zanbode@gmail.com)  
Sent on: Sunday, February 15, 2026 10:06 AM  
Subject: Crab Fishery Petition

**Comment:**

Oregon Fish and Wildlife Commission,

I am writing as a fisherman whose livelihood and whose family's future depends on Oregon's fishing industry. The new whale entanglement measures being considered would place enormous pressure on our industry, yet they are being advanced without the level of science needed to justify such changes.

At the same time, whale populations along the West Coast are increasing. Current estimates say that there is an annual growth rate of approximately 8.2 percent. However, while overall numbers are rising, NOAA notes that DPS-specific abundance remains uncertain, and some DPSs may be at or near their Potential Biological Removal thresholds. This uncertainty is exactly why Oregon should not be regulating based on incomplete or inconclusive science.

The economic impact of these proposed measures is profound. Oregon's Dungeness crab fishery is the backbone of many coastal towns. When regulations restrict our ability to fish, the effects ripple far beyond the boats themselves. Fishing families face reduced income, unpredictable seasons, and the real possibility of being forced out of an industry that has sustained generations.

Coastal communities feel it immediately. Local businesses—fuel docks, gear shops, processors, ice plants, restaurants—depend on a stable and workable crab season. When fishermen cannot fish, these businesses struggle, jobs disappear, and the economic foundation of entire towns begins to erode.

The impact reaches inland as well. People across Oregon, the United States, and overseas look forward to fresh Dungeness crab every winter. Families gather around it during the holidays. Restaurants rely on it. Visitors come to the coast expecting it. Every unnecessary restriction drives up prices, reduces availability, and weakens the connection between Oregonians and one of the state's most iconic, sustainable fisheries.

Fishermen have always been stewards of the ocean. We depend on healthy oceans, just as we depend on healthy fisheries. But we cannot protect either if regulations are built on assumptions instead of solid science. Implementing broad restrictions without first filling the research gaps risks harming the very communities that have sustained Oregon's coastal identity for generations.

I urge the Commission to prioritize investment in research before imposing additional measures. Oregon needs clear, defensible science on whale migration, DPS-level abundance, and stock thresholds before extreme measures can be taken.

My livelihood and family depends on Commercial Crabbing. My deckhands livelihood and family relies on Commercial Crabbing. With the economic impact these regulations bring to our fleet, who's going to pay the bill to continue our way of life? Are we expected to spend thousands of dollars to convert to regulations that are not based on current science? What happens if this gets passed, and my permit drops value over 70% overnight like California? How am I supposed to continue paying my \$100,000 loan I took to purchase my permit when it loses most of its value, and the season for traditional gear is a sad

reminder of what it once was? How am I supposed to purchase the new gear, and implement them on a 24' boat that can't hold the weight of a larger vessel?

Thank you for considering the real-world economic impacts these decisions have on the fishermen who make their living on the water. Our financial futures depend on clear, science based decisions.

Sincerely,  
Alexander Bode  
F/V Seek and Destroy

From: Jill Edwards  
E-mail: [jill.edwards.61@gmail.com](mailto:jill.edwards.61@gmail.com)  
Sent on: Sunday, February 15, 2026 12:47 PM  
Subject: Crab Fishery Petition

**Comment:**

Dear Directors office staff,  
Please add this comment letter from Shrimp Producers Marketing Cooperative (SPMC) to the public comment section.

Kind regards,  
Nick Edwards

February 15, 2026



ODFW Directors Office  
4034 Fairview Industrial Dr,  
SE Salem, OR 97302

Dear Chair Wahl and fellow commissioner's,

My name is Nick Edwards. I am the Secretary of Shrimp Producers Marketing Cooperative (SPMC). Our membership vessels harvest Jordanian pink shrimp, Bottom fish and Dungeness crab in the waters off Oregon, Washington and California.

We respectfully ask the commissioners to deny this NGO petition in its entirety. ODFW cannot let the NGO's use their power and influence to implement rule changes in Oregon's Dungeness crab fishery. The ODFW is already acting proactively with making in season rule changes to address current whale entanglements in Oregon's Dungeness crab fishery. Under Oregon's Administrative Act (APA) I would like to address two criteria's, economics and legal basis. Oregon's Dungeness crab fishery has 383 active permits. ODFW has implemented Oregon colored whale entanglement rope program. All trailer lines and vertical lines will 100% marked with Oregon colored line by 2030. This compliance has a economic impact to the fleet.

The cost to Oregon's Dungeness crab fleet is 21.2 million dollars.

153 vessels have a 500-pot tier. Cost is 76,750 each, 11.7 million total.

165 vessels have a 300-pot tier. Cost is 45,900 each, 7.5 million total

65 vessels have a 200-pot tier. Cost is 30,600 each, 2.0 million

21.2 million is the economic impact to the Dungeness fishery.

The cost to implement pop-up gear has a much bigger economic impact to Oregon's Dungeness crab fleet and we would not be using the 21 million dollars of Oregon colored rope as its not fully needed for pop-up gear.

153 vessels have a 500 tier, cost is 225,000 each, that's 36.6 million

165 vessels have a 300 tier, cost is 135,000 each, that's 22 million

65 vessels have a 200 tier, cost is 90,000 each, that's 5.8 million

Total investment is 64.4 million. Where does this money come from?

The discussion of pop-up gear being proposed by the NGO's meets their narrative for less whale entanglements in Dungeness crab fishery. Pop-up gear is so problematic in multiple ways. This unproven technology will not work inside of 20 fathoms as the swell reaches 26ft and pot strings become sanded in. The pop-up sled is buried in the sand and cannot be deployed to the surface, its already happened in California. This gear cannot be grappled as well and becomes a safety risk trying to recover the gear. Pop-up gear deployed outside 50-100 fathoms in the shrimp grounds creates even a bigger safety issue when the pop-up gear does not deploy. Vessels trawling for pink shrimp during the summer could catch the pop-up gear be caught on the trawl net or doors. This weight shift distribution can capsize a vessel in normal sea conditions. Pop-up gear has a bigger chance of lost gear than the current vertical lines being used in the Dungeness crab fishery today.

The legal basis is the other criteria I would like you to consider. In your ODFW packet you have a copy of the NMFS whale strike denial letter to CBD, its dated April 7 th 2022. CBD requested NMFS to utilize its authorities under the endangered species act (ESA) and the Marine Mammal Protection Act (MMPA). The NMFS denied all three of their regulatory action changes. In the NMFS conclusion it states. We are denying your petition because vessel strikes do not seem to be preventing or impeding in the recovery of blue, fin or humpback whales off the US West Coast, and we do not deem it necessary or appropriate, under MMPA section 112 (A) and (ESA) section (11) F

Commissioners, the Oregon Dungeness fishery is no different. We are not preventing or impeding the recovery of the Humpback whales or the Leatherback turtle. NMFS provided data supporting that in 2020 the humpback whale biomass was at 4,800 animals. NMFS stated the growth rate was 8% in 2020, that's 384 births. In 2026 the population has almost doubled to 8,219 whales. That's 608 births. We have a conservation success story, the full recovery of the humpback whales.

In conclusion, The Oregon Dungeness crab fishery is the economic driver to our coastal communities. We must learn from the mistakes made with rule changes in the California Dungeness crab fishery. Vote No on this petition and let ODFW staff along with industry do their work.

Sincerely, Nick Edwards  
Secretary SPMC



From: Laurie Bond  
E-mail: [bond7197@comcast.net](mailto:bond7197@comcast.net)  
Sent on: Sunday, February 15, 2026 2:36 PM  
Subject: Crab Fishery Petition

**Comment:**

Dear ODFW,

Our names are Dave and Laurie Bond and we are lifelong Oregon residents and retired public teachers here. We are concerned about the December 2025 Petition seeking amendments to OAR Chapter 635, Division 5 governing the Oregon Commercial Dungeness crab fishery. This petition should be denied. One of our sons-in-law is a commercial fisherman and we know how much he and other fishermen care about whale conservation and coastal communities who rely on a stable crab season. This petition proposes rigid mandates that are not necessary when Oregon is already engaged in active risk-reduction efforts. Even NOAA has concluded that our whale population is stable and growing.

Allowing this petition to pass will greatly harm the fishing industry and all of the people it employs in our state as well as the communities in which those fishermen live. The Oregon crab industry supports the coastal communities and deserves our support to keep doing so.

We respectfully ask the Commission to deny this petition and allow Oregon's science-based processes move forward.

Thank you,

Dave and Laurie Bond

**From:** Christina Hannahs  
**E-mail:** [Christina@seawaterseafoodco.net](mailto:Christina@seawaterseafoodco.net)  
**Sent on:** Sunday, February 15, 2026 7:48 PM  
**Subject:** Crab Fishery Petition

**Comment:**

To the ODFW Commissioners,

My name is Christina Hannahs, and I work on the working waterfront supporting fishing vessels by handling offloading paperwork, quality control, and administrative duties. I have worked alongside some of the hardest-working people I know. I see firsthand what it takes to keep a working waterfront and fishing fleet operating — the long hours, the precision, the safety standards, and the pride people take in doing this work right.

My livelihood and the survival of our coastal communities are directly tied to the decisions being considered under this petition.

This proposal does not only affect fishermen. It affects the entire working waterfront. Dungeness crab is the backbone of many Oregon ports. When crab access is restricted, the impact spreads immediately to processors, gear suppliers, offloading facilities, small businesses, banks, tourism, and the families who depend on this economy. This industry is not a side activity — it is the economic engine that sustains entire coastal towns.

The financial burden of the proposed changes would fall directly on fishermen and buyers in an industry that already operates under narrow margins and high risk. Regulatory instability discourages lending and investment. When access becomes uncertain, opportunity disappears, and future generations are pushed out of the trade entirely.

We are also deeply concerned about the scientific foundation used to justify this petition. Much of the referenced stock and distribution information relies on outdated information. Considering the effects economically to our small community, I believe this data should be rooted in current, peer-reviewed science rather than presumption.

We want to be clear: fishermen are not opponents of conservation. Our livelihoods depend on healthy ecosystems. We want a functional partnership with ODFW and a process built on collaboration. Outside pressure should not replace stakeholder engagement with the people who live and work on this ocean every day.

One of the most discussed mitigation technologies to reduce whale entanglements is ropeless or “pop-up” gear. On paper it is described as innovation. On the dock it looks like a bill most working fishermen simply cannot absorb.

Research and pilot programs estimate that converting a vessel to ropeless gear can cost around \$70,000 per boat under current production conditions, with costs increasing based on vessel size and number of gear strings. For real working boats in Oregon:

- A 300-pot vessel could reasonably face \$50,000–\$80,000+ in upfront costs
- A 500-pot commercial vessel could face \$80,000–\$120,000+ or more

These figures do not include lost fishing efficiency, maintenance, software subscriptions, battery replacement, training, downtime, or the operational risks of new technology in rough ocean conditions. This is not a minor upgrade. It is an industry-level capital shock that would fall directly on fishermen and buyers. We would have to absorb the cost personally.

Under the Administrative Procedures Act, economic impact must be weighed alongside biological concerns. A regulation that collapses working waterfronts without definitive scientific necessity is not conservation — it is displacement. A shortened or unstable crab season threatens businesses, ports, and families who have built their lives around this industry.

And for coastal families, these numbers are not abstract.  
That is college money.  
That is a mortgage.  
That is retirement savings.  
That is whether a multi-generation family business survives.

These costs do not land on large corporations. They land on independent fishermen, deckhands, offloading sites, processors, and the small coastal towns where the crab season determines whether businesses stay open and whether young people see a future in the industry.

We are not asking to ignore whale protection. We are asking for science-driven policy, collaborative management, and realistic timelines that protect both marine life and coastal communities. Fishermen want whales protected — but we also want our communities protected. These goals are not enemies unless policy forces them to be.

The path forward is cooperation: updated science, meaningful stakeholder partnership, and adaptive management that protects whales without erasing working families. We are ready to work. Buyers are ready to work. Ports, tribes, and communities are ready to work.

For these reasons, we respectfully urge the Commission to deny this petition and commit instead to a collaborative, evidence-based process that protects both marine life and the working waterfronts that sustain Oregon's coast.

We are here.  
We are willing to work.  
And we want to be part of the solution — not casualties of it.

Sincerely,  
Christina Hannahs  
Quality Control  
Seawater Seafood Co.

**From:** Deborah Shortman  
**E-mail:** [debra.shortman@gmail.com](mailto:debra.shortman@gmail.com)  
**Sent on:** Sunday, February 15, 2026 9:00 PM  
**Subject:** Crab Fishery Petition

**Comment:**

To Whom it May Concern:

My name is Debra Shortman, and our family owns a commercial fishing boat. This is our first year participating in the commercial Dungeness crab fishing industry. My husband is self employed and we recently sold our home and used our entire finances to get into this more stable fishery, as we have trolled for tuna and salmon previously. We love being outside and working hard as a family, and this is a lifestyle we can share with our two children on our boat. We enjoy providing quality food products to our communities and around the world. We sincerely care about God's creation and are interested in helping animals and the environment like those signing the petition.

The truth of the matter is, other whale populations have been increasing without changes to this crab fishery already as well as periods of improvements in this specific whale population numbers. When you look at the scientific research articles, they note global climate change affecting whale food sources as the reason for this decline. NOAA itself concludes on its website, "This malnutrition led to increased mortality during the whales' annual northward migration (from Mexico to Alaska) and decreased production of calves. This resulted in an overall decline in population abundance." If crabbing was the main cause of their decline, their numbers should be continually dropping since 1889 when crabbing first started in Oregon. There should not be years of increase in whale populations.

Crabbing is one of the most naturally sustainable fisheries, now lasting over 175 years due to limitations in season, sex and size requirements. These new gear and pot reductions will hurt small family run businesses like ours, which will trickle over to affect our small coastal communities as well as decrease seafood availability. This would extend beyond just reduction in crab availability, as the crabbing industry fuels many other fisheries.

Here are a couple questions I have:

- Who will fund the changes in gear for the crab fishing families? Our family does not have \$250,000 to pay for all new gear as we just purchased new gear this year. This will be very wasteful with current gear and impossible for us to afford by 2028. The state and/or the petitioning agency should have to pay for these unreasonable requests as our family has already been forced to spend extra money on special rope. This is an unfair burden to place on fishing families.
- How do we really know these few whales seen with rope on them are even dying because of entanglement? How can we prove that they were not sick/injured/malnourished already or even dead prior to becoming entangled?
- With overall increased whale populations wouldn't there naturally be some slight increase in rope-involved events?

We would also like to get to the bottom of why this specific species of whale is declining, but I, along with NOAA, feel the larger concern is food supply and climate change for the migrating whale, not the commercial crab industry. If these new restrictions and requirements are implemented, I am afraid you will be putting an end to many small family run businesses like ours, as well as hurting the coastal communities that rely on their income, tax dollars, and products.

Thank you for your time,  
Debra Shortman

**From:** Melissa Moon-Suit  
**E-mail:** [melissamoonsuit@gmail.com](mailto:melissamoonsuit@gmail.com)>  
**Sent on:** Monday, February 16, 2026 8:08 AM  
**Subject:** Crab Fishery Petition  
**Comment:**

I am opposed to the revision of dungeness crab fishery rules.

**From:** Jess  
**E-mail:** [finallyforever333@gmail.com](mailto:finallyforever333@gmail.com)  
**Sent on:** Monday, February 16, 2026 8:42 AM  
**Subject:** Crab Fishery Petition  
**Comment:**

I am writing this email to support all my local cabbng friends and fisherman whom these new rules affect. I do NOT support the new rules. Oregon runs on commercial fishing and you cannot take that away.

Jessica H.

**From:** Araina Adams  
**E-mail:** [suger248@hotmail.com](mailto:suger248@hotmail.com)  
**Sent on:** Monday, February 16, 2026 8:52 AM  
**Subject:** Crab Fishery Petition  
**Comment:**

Dear Members of the Commission,

My name is Devin Christensen, and I am writing to you as a working crew member in Oregon's commercial crab fishery. I respectfully ask that you deny the petition currently before you.

For those of us who work as crew, this fishery is not a side job or a seasonal convenience—it is how we support our families, pay our bills, and build our lives here on the Oregon coast. Any reduction in opportunity, access, or fishing time directly affects our ability to earn a living. When restrictions are placed on the fishery, it is often the crew who feel the impact first and the hardest. Lost days on the water mean lost income, and for many of us, there is no backup plan.

We rely on this fishery being managed with balance and fairness. Over the years, we have trusted ODFW to use sound science, real data, and firsthand knowledge of Oregon's fisheries when making decisions. That trust matters to us. It allows us to keep showing up, working hard, and believing that our livelihoods are being considered alongside conservation goals.

We are hopeful that once again, ODFW will make the right decision by denying this petition. The current management measures have already required sacrifices from fishermen and crew alike, and we have stepped up to meet those challenges. Further restrictions based on speculation or outside pressure—not on Oregon-specific data—would place an unnecessary burden on working people who depend on this fishery to survive.

I respectfully ask you to consider the crew members, deckhands, and families whose lives are directly tied to this industry. Denying this petition would help protect our jobs, our communities, and the future of Oregon's commercial fishing workforce.

Thank you for your time, your service, and for considering the voices of those of us who work on the water every day.

Respectfully,  
Devin Christensen Commercial Fishing Crew  
Fv Sea Spirit

**From:** Maddie Schuttpelz  
**E-mail:** [maddieschuttpelz@hotmail.com](mailto:maddieschuttpelz@hotmail.com)  
**Sent on:** Monday, February 16, 2026 8:58 AM  
**Subject:** Crab Fishery Petition  
**Comment:**

Dear Commissioners of the Oregon Department of Fish and Wildlife Commission,  
I am asking you to strongly DENY the petition requesting additional crabbing regulations based on concerns related to whale entanglements.

How can you even consider accepting this petition with the lack of scientific evidence? Where is the information that shows the entanglements are causing a population decline? Current data does not appear to support the conclusion that the crabbing industry is affecting whale populations.

NOAA in its last population assessment claims an 8.2 population growth rate. Which seems to me that the whale populations are growing and that the crabbing industry is not affecting them.

The industry has already been forced to take steps, gear reduction, line marking gear, and additional springs tags. Those measures have imposed significant costs to our crabbing industry, with no biological benefit. Some of the proposed changes would significantly increase operating costs and losses as well as create serious safety concerns for vessel operators and crew.

The commercial crabbing industry supports thousands of jobs which contribute to all of the Oregon Coast Communities. It generates substantial local and state revenue. The proposed changes will place these communities at unnecessary risk with the lack of biological evidence.

I am also very concerned that this petition is being pushed by advocacy pressure rather than by biological information.

I urge ODFW to reject this petition. Please ensure that any new measures are science-based and biologically justified.

Thank you,

Sincerely,  
Fisherman's Wife of 20 years  
F/V And Then Some

**From:** Chad Schuttpelz  
**E-mail:** [cschuttpelz@gmail.com](mailto:cschuttpelz@gmail.com)>  
**Sent on:** Monday, February 16, 2026 9:04 AM  
**Subject:** Crab Fishery Petition  
**Comment:**

Dear Commissioners of the Oregon Department of Fish and Wildlife Commission,

I am asking that you strongly oppose the petition requesting additional crabbing regulations based on concerns related to whale entanglements.

I am a 2nd generation fisherman. My father started crabbing in 1979. I was born in 1980 and the crab fishery has been the backbone of my life.

There is not enough scientific data on the population problem as the growth is rising 8.2 annually.

We have already been forced to reduce, purchase spring tags and line mark our gear. Those changes alone have already added significant costs to our crabbing industry.

The last entanglement was in derelict gear with no spring tag. I feel ODFW should have a better derelict program. Why is there not a boat that goes up and down the coast that runs a grid looking for lost pots that leaves a track line to show that all areas have been searched.

For as more gear changes like pop up gear the price alone will kill commercial fishing businesses.

Long lining pots don't work for all vessels. I have been longlining for halibut and black cod for over 20 years. I don't see how with the weight of the pot it is going to work for all vessels it will be a hazard to the crew and the boat.

Why is ODFW not expediting an incidental take permit for Oregon crab? The trawl fishery in Alaska can take up to 16 Orcas. They are proposing a shutdown with a single whale entanglement for Oregon?

Please stand up for the crab fishermen of Oregon and let them know that we are not making any changes until there is more data on the number of whales.

Chad Schuttpelz  
F/V Grizzly

**From:** mike retherford  
**E-mail:** [880mike@gmail.com](mailto:880mike@gmail.com)  
**Sent on:** Monday, February 16, 2026 9:55 AM  
**Subject:** Crab Fishery Petition  
**Comment:**

Michael Retherford  
F/V Excalibur  
Newport Or. 97365

Dear Chair and Commissioners of ODFW

I am writing to formally oppose the petition to amend OAR Chapter 635, Division 005 as it relates to Oregon's commercial Dungeness crab fishery.

My name is Michael Retherford, I have been in the Oregon Crab fishery for 40 years. I am writing this plea on behalf of my wife and I. We have raised up four incredible children in this industry, three boys and one daughter, all very involved in our family business. Our vessels provide, not only for our family, but multiple families that work with us. So I ask that you please consider our request.

Oregon's crab fishery is one of the most economically significant and well-managed fishery on the west coast. For decades it has supported working families, deckhands, processors, local businesses, as well as coastal communities. To impose such a petition advanced by an out-of-state organization would be devastating to all involved. We all know, as we see the humpback whale population growing at a rate of 8% annually, that we need to take measures to avoid them, in which we have, thru state and local input and collaboration with the industry, I believe we are moving in the right direction, with out being demanded by organizations that want drastic and unreasonable changes.

My concerns include:

**Economic impact on Harvesters:** Commercial crabbers operate within tight margins and volatile ocean conditions. New gear requirements would increase costs, reduce efficiency, and create operational safety concerns without clear proof of benefit

**Unproven Application in Oregon Waters:** Management strategies tested elsewhere may not translate effectively to Oregon's coastal environment, fleet size, and fishing practices.

**Community Economic Stability:** Coastal ports depend heavily on the Dungeness crab season. Reduced productivity or increased compliance cost would ripple through processors, suppliers, fuel docks, and small businesses.

**Out-of-state Advocacy Influence:** Regulatory changes affecting Oregon's public trust resources should be based on Oregon data, Oregon science, and Oregon stakeholders input, not policy agendas developed outside our state.

Oregon Dungeness crab fishery has long been recognized for responsible management and sustainability. Any additional restrictions must be supported by comprehensive regional data and meaningful collaboration with Oregon harvesters before consideration.

So with that, I respectfully urge the Commission to deny this petition, and continue working within our state agencies and direct consultation with affected commercial crab stakeholders

Thank you for your time and commitment to maintaining a strong, sustainable, and economically Dungeness crab fishery in Oregon.

Sincerely,  
Michael and Kelley Retherford

From: Rick Osborn  
E-mail: [rick@blueridgestrategies.net](mailto:rick@blueridgestrategies.net)  
Sent on: Monday, February 16, 2026 10:12 AM  
Subject: Crab Fishery Petition

**Comment:**

Hello,

Please accept my written testimony in opposition to proposed regulatory changes to the Oregon Dungeness Crab Fishery. Let me know if you have any questions.

Sincerely,

Rick Osborn  
Blue Ridge Strategies



**Testimony in Opposition to Dungeness Crab Regulatory Modifications**

Chair Mary Wahl, Vice-Chair Becky Hatfield-Hyde, and members of the Oregon Fish and Wildlife Commission:

My name is Rick Osborn and I live in Coos Bay. My public affairs firm, Blue Ridge Strategies, represents the Coos Bay North Bend Charleston Visitor and Convention Bureau and other tourism interests on the Oregon Coast.

We care about our environment, and the coastal economy. We – like our coastal commercial fishers – treasure our whales and all other forms of native sea life. We also highly value our commercial fishing fleet. This is not just an occupation in our communities. It is a way of life passed down from generation to generation. Anyone who truly understands the Oregon Coast knows that commercial fishing is deeply interwoven into the fabric of our communities.

There are many ways that this regulatory proposal will decimate our coastal economy and communities. You will hear about them from many other folks in other testimony. I'm writing to tell you this: According to a commission studied a few years ago, 90 percent of the seafood served in local restaurants is not from Oregon.

Visitors spend around \$800 million per year dining at restaurants on the Oregon Coast, so that's a lot of seafood that is being imported. If less Dungeness crab is available locally – which this regulation change would cause – more carbon emissions will be created shipping in non-local seafood to fill the demand. In the global seafood market, some of the seafood that is imported into this country is tied to human rights violations. It is more important than ever to have a more robust local food supply chain, including Oregon Coast seafood.

This proposal punishes an industry that already is doing its best to prevent and mitigate whale entanglements. The fishermen in this industry are committed to keeping it sustainable and clean. In response to their efforts, this proposal will create costly upgrades to fishing boats that small vessels can't afford. It will drive them out of business. This is the opposite of how we should be growing a sustainable economy.



We should be supporting the good, ethical fishers who have made their livelihoods off the Oregon Coast for generations. We can do that by taking a more collaborative approach to both prevent and mitigate for whale entanglements while avoiding measures that will put small fishermen under. Thank you for your time and for considering my testimony today.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick Osborn", written in a cursive style.

Rick Osborn  
Blue Ridge Strategies  
999 N. Front St., Ste. 101  
Coos Bay, OR 97420  
[rick@blueridgestrategies.net](mailto:rick@blueridgestrategies.net)

From: Jeremy Coon  
E-mail: [tillamookbayseafoods@outlook.com](mailto:tillamookbayseafoods@outlook.com)  
Sent on: Monday, February 16, 2026 11:04 PM  
Subject: Crab Fishery Petition

**Comment:**

Dear Commissioners.

I'm writing this email in response to a petition that was filed by the Center for Biological Diversity, Oceana (CBDO) on December 11, 2025.

I am a fisherman and fish buyer from the port of Garibaldi. My family has been in the commercial fishing industry since my grate grandfather started dory fishing in pacific city, Oregon almost a century ago.

I have many concerns with this potition filed by CBDO.

I believe the petition is bad for our commercial crab industry.  
I believe before any of the potion is even considered there should be:

Unbiased and up to date science.

I believe there needs to be clear and up to date science on whale populations and travel routs.  
I believe the most recent population study was done in 2018. There needs to be a scientific way to prove if the whale is actually from the endangered group or not vs just assuming it is.

I believe there needs to be an economic impact study on a fishing fleet forced to purchase new types of fishing gear, fishing communities, and impact on the crab buyers and their wholesale markets that will receive less crab to market. Some permit holders I personally know are not in in a financial position to redo all their commercial crab gear when just making boat payments and keeping up on current gear is financially hard enough. Forcing everyone to buy this new gear by 2028 will definitely put many fisherman out of business and that's a fact.

There is a Lack of information on testing pop up gear in Oregon waters and depths we fish at.

Setting a hard deadline of 2028 for a gear type transition that is untested in Oregon waters or on a diversified fleet of vessels is setting a precedent for our state and does not account for the time needed for the fleet to financially and technically test or adapt to ropeless systems.

I believe These groups like CBDO will not stop with this even if they get everything on their wish list. They will not stop untill they regulate our fisheries out of existence and we are all vegan.

Thank you for taking the time to read this email

Jeremy Coon

From: Heath Hampel  
E-mail: [heath@chucksseafood.com](mailto:heath@chucksseafood.com)  
Sent on: Monday, February 16, 2026 11:28 AM  
Subject: Crab Fishery Petition

**Comment:**

Thank you.

Heath Hampel  
Chuck Seafood  
541-888-5525

The continued delay in finalizing and submitting the conservation plan needed to secure federal coverage under a Section 10 Incidental Take Permit has created unnecessary uncertainty. The draft has existed for years. Completing and submitting it should have been a priority to protect the fishery and the communities that rely on it.

Instead, processors and fishermen alike remain exposed to litigation risk and shifting regulatory conditions. That uncertainty affects hiring decisions, capital investment, equipment purchases, and long-term contracts.

**The Need for Balanced Management**

Processors like me rely on a predictable, stable supply. When management decisions are made without sufficient biological justification and economic analysis, they destabilize not just boats, but the entire supply chain.

We are not opposed to conservation. The commercial crab industry has repeatedly demonstrated its willingness to adapt, innovate, and cooperate to reduce risk. But conservation must be evidence-based and balanced—not driven by external pressure without full consideration of economic consequences.

I respectfully urge the Commission to:

- Reevaluate the merits of this petition.
- Ensure that any proposed measures are biologically justified and economically vetted.
- Prioritize completion and submission of the conservation plan to provide regulatory certainty.
- Recognize the real livelihoods at stake across the harvesting and processing sectors.

My business supports 32 households. Those families deserve thoughtful, balanced decision-making that protects both Oregon's marine resources and the working communities built around them.

Thank you for your consideration.

Respectfully,

Heath Hampel  
Owner  
Chuck's Seafood

Heath Hampel  
Owner, Chuck's Seafood  
February 12<sup>th</sup> 2026

Chair and Members of the Commission  
Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

**Re: Petition Regarding Additional Whale Entanglement Restrictions**

Chair and Commissioners,

My name is Heath Hampel. I am a second-generation processor and the owner of Chuck's Seafood. My business supports an average of 32 households each year. These are not abstract numbers—they are families who depend directly on the strength and stability of Oregon's commercial crab industry.

I am writing to express serious concern regarding the recent petition related to additional whale entanglement restrictions. In my view, this petition should not have been granted merit.

**No Demonstrated Biological Necessity**

There has been no clear, population-level biological finding that Oregon's commercial crab fishery is driving whale population decline. Regulatory changes of this magnitude must be grounded in measurable biological thresholds and defensible science. Without clear conservation necessity, further restrictions risk becoming symbolic rather than effective.

**Insufficient Economic Analysis**

From the processing perspective, even modest reductions in fishing opportunity can have outsized downstream impacts. Reduced landings mean:

- Fewer working days for plant employees
- Less product moving through local trucking and distribution networks
- *Reduced income for fishing families, which directly affects coastal economies*

The petition does not appear to include a comprehensive economic analysis evaluating the full impact on processors, harvesters, ports, and the 32 households that my business alone supports. Sound management must consider economic sustainability alongside conservation goals. Proper economic analysis is a requirement of the petition process under the laws that govern Oregon administrative process. This alone was grounds to dismiss the petition.

**Failure to Secure Regulatory Certainty**

From: [info@oregonchardonnaycelebration.org](mailto:info@oregonchardonnaycelebration.org)  
E-mail: [info@oregonchardonnaycelebration.org](mailto:info@oregonchardonnaycelebration.org)>  
Sent on: Monday, February 16, 2026 11:35 AM  
Subject: Crab Fishery Petition

**Comment:**

Hello,

Attached please find a letter in support of the Oregon Dungeness Crab Commission's request to deny approval of the proposed petition to revise commercial Dungeness crab fishery rules.

Thank you,

Anne Nisbet  
Event Director  
Oregon Chardonnay Celebration



February 13, 2026

Oregon Fish & Wildlife Commission  
Public Comment – Commercial Dungeness Crab Fishery Rules

:

I am writing in support of the Oregon Dungeness Crab Commission in their effort to oppose approval of the petition requesting substantial modifications to Oregon's commercial Dungeness crab fishery regulations.

I have worked with the Oregon Dungeness Crab Commission for over twenty years. They have partnered with both the Oregon Chardonnay Celebration and the International Pinot Noir Celebration to provide product for our events. We see our organizations as an extension of the Crab Commission's marketing efforts. Our events draw people from across the U.S. and the globe and we seek to showcase Oregon food products with Oregon wines to promote the bounty of the State. Keeping brand Oregon in front of consumers is critical to promoting the choice of Oregon wines and foods by consumers.

The event industry has experienced a tremendous shift in its business model since the pandemic. We rely on partners like the Oregon Dungeness Crab Commission to support us with product as a way of reducing expenses. In return, we are able to help promote this valuable commodity across a broad range of consumers. Losing access to product limits our ability to provide a top-quality experience for people looking to experience the best Oregon has to offer.

As stated by the Oregon Dungeness Crab Commission, the proposed petition would result in significant economic losses by virtue of a shortened season, gear replacement costs, reduced catch efficiency and fleet consolidation.

The wine industry is also agriculturally based, relies heavily on small family operations, and its revenues (or lack thereof) significantly impact a number of other associated businesses. I see the potential negative impact of this petition on the Dungeness crab's economic impact across a web of partner businesses such as processing facilities, cold storage operations, and seafood distributors, shore-side businesses that support the fishery through fuel supply, gear manufacturers, vessel maintenance, and marine supply companies.

The industry has demonstrated longstanding commitment to conservation and has implemented significant measures to reduce whale entanglement risks. I encourage the Commission to take the long view and work directly with the Oregon Dungeness Crab Commission and the industry at large to address the petition's concerns in a manner that is less economically damaging to the Oregon Dungeness crab fishery.

Sincerely,

Anne Nisbet  
Event Director  
Oregon Chardonnay Celebration

From: [info@oregonchardonnaycelebration.org](mailto:info@oregonchardonnaycelebration.org)  
E-mail: [info@oregonchardonnaycelebration.org](mailto:info@oregonchardonnaycelebration.org)>  
Sent on: Monday, February 16, 2026 1:07 PM  
Subject: Crab Fishery Petition

**Comment:**

To the Oregon Fish and Wildlife Commission,

Thank you for the opportunity to comment on the petition to amend Oregon Administrative Rules Chapter 635, Division 5, related to the commercial Dungeness crab fishery. On behalf of the Port of Port Orford, we appreciate the Commission's efforts to protect marine mammals and support science-based approaches to reducing entanglement risk, while also maintaining a safe and viable commercial fishery.

Port Orford is home to a small-vessel, nearshore fishing fleet that operates under very specific physical and economic constraints. Because of vessel size, weather exposure, and port infrastructure, our fleet fishes close to shore. As a result, changes to gear requirements, fishing areas, or season structure have immediate impacts on fisherman safety, port operations, and the economic stability of our community. With that context, the Port offers the following comments and concerns.

**Late-season gear reductions and depth restrictions**

The proposed expansion of late-season gear reductions, depth restrictions, and eventual prohibitions on conventional gear would have disproportionate impacts on small-vessel ports like Port Orford. Limiting allowable gear while also restricting fishing to shallower depths compresses effort into smaller areas. This increases congestion, navigational risk, and conflicts between vessels, particularly during challenging late-season weather conditions.

**Economic impacts on small ports and fishing communities**

The Dungeness crab fishery is the economic backbone of Port Orford. NOAA's California Ecosystem Status Report identifies Port Orford as a community with both exceptionally high per-capita participation in commercial fishing and high social vulnerability. This means that even modest reductions in fishing opportunity can have outsized impacts on local livelihoods and overall community resilience.

Gear reductions, shortened effective seasons, or emergency closures triggered by single entanglement events could create cascading economic effects for fishermen, processors, support businesses, and the Port itself. While the proposed emergency closure provisions are intended to reduce risk, they raise concerns related to economic harm, due process, and the uncertainty involved in attributing entanglements.

**Emergency closure triggers and attribution**

The Port is particularly concerned about automatic or near-automatic closures based on a limited number of confirmed or suspected entanglements. Without clear causal evidence, these thresholds risk penalizing Oregon's fleet unfairly. We encourage the Commission to ensure that any emergency action framework includes strong standards for verification, considers cumulative risk factors, and provides meaningful consultation with affected stakeholders.

**Pop-up gear authorization and feasibility**

The Port supports continued research into alternative gear and voluntary adoption where it has been shown to work effectively. However, mandating new gear without sufficient field testing, enforcement capacity, cost analysis, and training raises serious concerns. For small operators, reliability, maintenance, cost, and gear recovery are critical considerations. A phased, incentive-based approach would be more appropriate than accelerated mandates.

### **Collaborative and adaptive management**

The Port of Port Orford strongly supports collaborative solutions developed through engagement with fishermen, ports, scientists, managers, and conservation organizations. Adaptive management approaches that rely on real-time data, voluntary measures, targeted risk reduction, and regional flexibility are more likely to achieve conservation goals without undermining the long-term viability of Oregon's working waterfronts.

Port Orford has a long history of responsible environmental stewardship, including locally driven efforts such as the creation of the Redfish Rocks Marine Reserve and ongoing collaboration to support the long-term health of Oregon's crab fishery.

We respectfully ask the Commission to carefully consider the safety, economic, and community impacts of the proposed rule changes, particularly for small ports. We welcome continued collaboration to develop balanced, evidence-based solutions that protect whales while sustaining Oregon's historic Dungeness crab fishery and the coastal communities that depend on it. Please see attached for a copy of this testimony for the commission's review.

Sincerely,

**Catherine Scobby**

--

*Catherine Scobby*

Port Administrator

541-332-7121

[c.scobby@portofportorford.org](mailto:c.scobby@portofportorford.org)

<https://portofportorford.org/>



**Port of Port Orford  
Post Office Box 490  
300 Dock Road  
Port Orford, OR 97465  
(541) 332-7121**



To the Oregon Fish and Wildlife Commission,

Thank you for the opportunity to comment on the petition to amend Oregon Administrative Rules Chapter 635, Division 5, related to the commercial Dungeness crab fishery. On behalf of the Port of Port Orford, we appreciate the Commission's efforts to protect marine mammals and support science-based approaches to reducing entanglement risk, while also maintaining a safe and viable commercial fishery.

Port Orford is home to a small-vessel, nearshore fishing fleet that operates under very specific physical and economic constraints. Because of vessel size, weather exposure, and port infrastructure, our fleet fishes close to shore. As a result, changes to gear requirements, fishing areas, or season structure have immediate impacts on fisherman safety, port operations, and the economic stability of our community. With that context, the Port offers the following comments and concerns.

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The proposed expansion of late-season gear reductions, depth restrictions, and eventual prohibitions on conventional gear would have disproportionate impacts on small-vessel ports like Port Orford. Limiting allowable gear while also restricting fishing to shallower depths compresses effort into smaller areas. This increases congestion, navigational risk, and conflicts between vessels, particularly during challenging late-season weather conditions.

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The Dungeness crab fishery is the economic backbone of Port Orford. NOAA's California Ecosystem Status Report identifies Port Orford as a community with both exceptionally high per-capita participation in commercial fishing and high social vulnerability. This means that even modest reductions in fishing opportunity can have outsized impacts on local livelihoods and overall community resilience.

Gear reductions, shortened effective seasons, or emergency closures triggered by single entanglement events could create cascading economic effects for fishermen, processors, support businesses, and the Port itself. While the proposed emergency closure provisions are intended to reduce risk, they raise concerns related to economic harm, due process, and the uncertainty involved in attributing entanglements.

### **Emergency closure triggers and attribution**

The Port is particularly concerned about automatic or near-automatic closures based on a limited number of confirmed or suspected entanglements. Without clear causal evidence, these thresholds risk penalizing Oregon's fleet unfairly. We encourage the Commission to ensure that any emergency action framework includes strong standards for verification, considers cumulative risk factors, and provides meaningful consultation with affected stakeholders.

### **Pop-up gear authorization and feasibility**

The Port supports continued research into alternative gear and voluntary adoption where it has been shown to work effectively. However, mandating new gear without sufficient field testing, enforcement capacity, cost analysis, and training raises serious concerns. For small operators, reliability, maintenance, cost, and gear recovery are critical considerations. A phased, incentive-based approach would be more appropriate than accelerated mandates.

### **Collaborative and adaptive management**

The Port of Port Orford strongly supports collaborative solutions developed through engagement with fishermen, ports, scientists, managers, and conservation organizations. Adaptive management approaches that rely on real-time data, voluntary measures, targeted risk reduction, and regional flexibility are more likely to achieve conservation goals without undermining the long-term viability of Oregon's working waterfronts.

Port Orford has a long history of responsible environmental stewardship, including locally driven efforts such as the creation of the Redfish Rocks Marine Reserve and ongoing collaboration to support the long-term health of Oregon's crab fishery.

We respectfully ask the Commission to carefully consider the safety, economic, and community impacts of the proposed rule changes, particularly for small ports. We welcome continued collaboration to develop balanced, evidence-based solutions that protect whales while sustaining Oregon's historic Dungeness crab fishery and the coastal communities that depend on it.

Sincerely,



**Catherine Scobby**  
Port Administrator

From: McKenzie Schuttpelz  
E-mail: [mckenzieschuttpelz@gmail.com](mailto:mckenzieschuttpelz@gmail.com)  
Sent on: Monday, February 16, 2026 2:00 PM  
Subject: Crab Fishery Petition

**Comment:**

Dear, Commissioners of ODFW

I am a daughter of a crab fisherman. I am 13 and a future third generation fisherman. My grandfather started his business as a commercial fisherman in 1979, then my dad started working for him in 1995 then became the captain in 2008. For me growing up this is my life. I have been around all of the commercial fishing businesses my whole life. I am hearing that ODFW is trying to put more restrictions towards commercial crabbing. These changes are going to be devastating to everybody's livelihoods, and how they make a living. I want to follow in my family's footsteps and continue the family business when I am old enough. These restrictions are going to make it harder for fishermen to keep their businesses going. I know there are more people in Oregon like me that are objecting to the petition. Please oppose this petition until there is more scientific evidence that shows that the commercial crabbing industry is actually declining the whale population.

Thank you for taking time to read my letter,  
Daughter of a Crab Fishermen

From: Christian Hooper  
E-mail: [hfaloha42@gmail.com](mailto:hfaloha42@gmail.com)>  
Sent on: Monday, February 16, 2026 2:00 PM  
Subject: Crab Fishery Petition

**Comment:**

I hope you will take a moment to read my letter.

Respectfully,  
Christian Hooper

To whom it may concern, my name is Christian Hooper. I am a second generation fisherman just now starting my career as a captain for my family's boat, the Aloha. After graduating from George Fox University in 2019 and finishing my third year fighting wildland fire, I began what at the time I thought was a side job in my off season fishing crab with my father. By the end of that season, I realized that working on the ocean is where I wanted to make my future. Over the last seven years, I have fallen deeper and deeper in love and proud with my job and the benefit it provides my community. At the same time during those past seven years, I have unfortunately seen the damage done to the other fleet due to regulations similar if not exactly the same as what is being proposed to you now. These changes have the ability to completely destroy an industry that countless families and communities rely on. These regulations also create a barrier to entry to untold numbers of the younger generation, both by drowning them in unnecessary regulations and by creating an cost of entry too steep for most average people.

Before going into explaining how these new rules are not needed, let me start off by saying that no one who works in this industry believes that regulations are not needed. Most of the current regulations keep the fishery and ecosystem viable and healthy. The issue here is rather that these proposed regulations are not tackling a real issue here in Oregon. Rather, the issues that this petition tries to address are issues that are already being worked on with the cooperation between fishermen and ODFW. The idea of a pot reduction in Spring crab fishing is redundant. The current state of crab fishing has hundreds of boats of all sizes, fishing hard for the initial first month or two. After that time most boats will start taking their gear out of the water in order to prepare for other fisheries. By the time April comes around, a majority of crab pots have already been taken out of the water, so forcing the few remaining boats to cut out even more pots is overkill. It serves only to drive small boats, the majority of spring crab fishermen, to be unable to continue fishing. The ideas put out by this petition also make it seem as if the hard working efforts between fishermen and ODFW have been a waste of time. There is no better subject matter expert on an issue than the person whose entire livelihood is dependent on that issue. The crabbers, local community, and even the individual ODFW staff who work in our communities are far more involved and appropriate stewards in this issue. These groups that sent you this petition have very little at stake here. They live and work hundreds to thousands of miles away from us and wish to dictate our communities as if their lives depend on the outcome. To accept this petition would ultimately put unnecessary strain on a good working relationship between ODFW and local coastal communities.

In addition, accepting the petition also creates a barrier to entry that harms future generations. The cost to get into the fishing business currently is enormous. Crab traps range from \$100-\$300 per trap depending on if you are buying new or used. After that, you need to buy ropes, buoys, bait jars, bait bags, cotton, door hooks, and rubber straps. That'll increase the cost to about \$250-\$600 per trap. All this and that's going under the assumption that you already have a boat and permit. If you don't, you can add in an extra \$25,000 minimum for a small boat that will definitely have issues. Add on an additional \$50,000 more for the smallest permit available, using only 200 traps. Once you add it all up, a potential new fisherman is looking at spending a minimum of \$125,000 for a small boat with issues, a small permit and 200 old used crab traps. This is all before you add in the cost of fuel, bait, insurance, slip rent, deck equipment, and crew guys. Now after speaking with other fishermen who have tried the novel pop up gear, the additional gear cost is roughly \$12,000 to \$20,000 more per 100 pots, bringing the hypothetical fisherman's cost of entry in the previous example to \$149,000 to \$157,000. This is the daunting entry price for my generation to try to get into the business. A price that most will be unable to reach and make a living. Once you start taking out crab pots and restricting where one can go to fish, the position is untenable.

In the beginning of this letter, I said the truth that all fishermen agree. Some regulation is good for the industry. It's important to keep in mind that the regulations being put in place are based on science not knee-jerk reactions. Additionally, it must take into account the people whose lives it will change. Once input and ideas are being dictated by outside actors with no stake in the industry, nothing good will come of it. To ignore the locals for those who have little interest or investment, will destroy our coastal communities forever. Please deny this petition

From: Laurie Schuttpelz  
E-mail: [laurieschuttpelz@gmail.com](mailto:laurieschuttpelz@gmail.com)  
Sent on: Monday, February 16, 2026 4:05 PM  
Subject: Crab Fishery Petition

**Comment:**

Dear, Commissioners of ODFW

I am a daughter of a crab fisherman. I am 13 and a future third generation fisherman. My grandfather started his business as a commercial fisherman in 1979, then my dad started working for him in 1995 then became the captain in 2008. For me growing up this is my life. I have been around all of the commercial fishing businesses my whole life. I am hearing that ODFW is trying to put more restrictions towards commercial crabbing. These changes are going to be devastating to everybody's livelihoods, and how they make a living. I want to follow in my family's footsteps and continue the family business when I am old enough. These restrictions are going to make it harder for fishermen to keep their businesses going. I know there are more people in Oregon like me that are objecting to the petition. Please oppose this petition until there is more scientific evidence that shows that the commercial crabbing industry is actually declining the whale population.

Thank you for taking time to read my letter,  
Daughter of a Crab Fishermen

Dear Chair and Commissioners of Oregon Fish and Wildlife Commission.

Please deny the petition for additional crabbing regulations related to whale entanglement. This ruling would have a devastating impact on the commercial crab fleet, coastal communities, and my fishing family

I have been commercial crabbing since 1979. Before limited entry in 1995, many boats had over a thousand pots. We have cut our gear in half in the Tier program. There are only so many of us, but no limit to how many whales may over populate our area.

We are required to purchase spring tags cutting back 20% in compliance for whales with threats of more reduction. We want no more cuts. We have purchased crab pot pumps to avoid leaving stuck pots. We have complied with the colored line to establish state areas at our expense. We work together and communicate with fellow fisherman if their gear is out of place. We are not interested in the investment of pop-up crab gear. It is not feasible for our area.

What about the guided sport crabbers that leave their pots overnight daily as they do in our area? Will they be subject to the same regulations? If there is an entanglement, and it is not commercial, we will still be under fire and risk of a shut down?

The petitioners were intentionally timely in the midst of our busiest time of the year harvesting crab. This demand response by March 11, 2026 should be dismissed.

Do not rush a decision of this magnitude with so many lives at stake. On December 11<sup>th</sup> you got a demand from conservation groups to take action to cripple our industry, 4 days before our crab season was set to begin. This is our harvest time and we should be out tending our crab pots. Our minds should be on our work instead of lawyering up to fight for our lives. The extra tuffs are off. We are showing up on February 20th in full force ready to defend our livelihood and our fishery.

Charlie Schuttpelz

F/V Grizzly

Winchester Bay

From: Eric Brickenstein  
E-mail: [Eric@northcurrentlegal.com](mailto:Eric@northcurrentlegal.com)>  
Sent on: Monday, February 16, 2026 4:56 PM  
Subject: Crab Fishery Petition

**Comment:**

Dear Honorable Commissioners:

Attached please find Oregon Coast Crab Association's comment in opposition to the petition for rulemaking regarding Oregon's Dungeness crab fishery rules that is before the Commission for consideration on February 20.

Respectfully submitted,

Eric J. Brickenstein  
*Attorney for Oregon Coast Crab Association*

**ERIC BRICKENSTEIN** | PARTNER  
(503) 489-9020 | [www.northcurrentlegal.com](http://www.northcurrentlegal.com)



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**Oregon Coast Crab Association**  
PO Box 28  
Newport, OR 97365

February 16, 2026

**VIA EMAIL**

Oregon Fish and Wildlife Commission  
Oregon Department of Fish and Wildlife  
[odfw.commission@odfw.oregon.gov](mailto:odfw.commission@odfw.oregon.gov)

RE: Opposition of Oregon Coast Crab Association to Petition for Rulemaking.

Dear Commissioners:

Oregon Coast Crab Association (“OCCA”) is an Oregon non-profit corporation whose membership includes more than 130 Oregon Dungeness crab permit holders, seafood processors, vessel representatives, and hired captains active in Oregon’s commercial Dungeness crab fishery. OCCA respectfully submits this comment in opposition to the petition for rulemaking (“Petition”) filed on December 11, 2025, by the Center for Biological Diversity, Oceana, NRDC, and the American Cetacean Society (collectively, “Petitioners”).

**I. EXECUTIVE SUMMARY.**

Oregon’s commercial Dungeness crab fishery is among the best managed and most sustainable fisheries in the world. It is also the economic and cultural backbone of coastal communities across the state. These two facts are interconnected. For decades, generations of Oregon’s fishing families have worked together as trusted partners with this Commission and the Oregon Department of Fish and Wildlife to protect the fishery’s long-term health. Every Oregonian should be proud of that success.

On December 11, four outside special interest groups filed a petition to co-opt management of Oregon’s flagship fishery. The Petition rebukes the collaborative model that has served Oregon well for decades and fostered trust between ODFW and stakeholders. Petitioners are attempting to coerce this Commission to cede fishery management and oversight to organizations that embrace an agenda completely divorced from the welfare of ordinary



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Oregonians. Make no mistake: The Petition is nothing less than a backdoor attempt to destroy Oregon's vital Dungeness crab fishery.

As more fully discussed below, the Petition should be denied for seven key reasons:

- (1) The proposed rules would decimate Oregon's commercial fishing fleet, with cascading effects that will harm thousands of Oregon families.
- (2) Accepting the Petition would severely damage the trust between ODFW and its stakeholder partners that has been built over decades.
- (3) The Petition would subject ODFW to direct oversight by extreme special interest groups under a permanent threat of litigation.
- (4) The Petition contradicts ODFW's draft Conservation Plan ("CP"), which rejects pop-up gear as non-viable.
- (5) Petitioners misrepresent Oregon's response to entanglement risk and falsely accuse Oregon of violating federal law.
- (6) The proposed rules are arbitrarily burdensome, and Petitioners' offered justifications lack scientific integrity.
- (7) Petitioners ignore available alternatives to manage entanglement risk without destroying Oregon communities.

Accepting the Petition would set a dangerous precedent. Petitioners have forced this Commission to a crossroads: The Commission can affirm its commitment to the collaborative management model that has made Oregon a global leader in sustainable fishery management, or it can try to appease out-of-state special interest groups at Oregonians' expense. The choice is clear. The Commission should deny the Petition.

**II. LEGAL STANDARD.**

The Commission has discretion to deny a petition for rulemaking.<sup>1</sup>

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<sup>1</sup> ORS 183.390(1).



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**III. BACKGROUND.**

**A. Oregon's Commercial Dungeness Crab Fishery is Fundamental to Oregonians' Economic and Cultural Welfare.**

The Commission knows well the unmatched importance of the Dungeness crab fishery to Oregon, and particularly the State's coastal communities. More than 300 vessels participate in the fishery each year. During the 2024-25 season, the ex-vessel value of Oregon's Dungeness crab landings totaled nearly \$100 million across six major ports, and the fleet directly employed hundreds of workers in family wage jobs.

But these measures, though highly significant, understate the Dungeness crab fishery's total economic value by an order of magnitude. That is because the fishery's economic output also includes the work of fish buyers, processors, distributors, restaurant staff, gear suppliers, port staff, and countless others across a diverse range of industries. Properly accounted for, the Dungeness crab fishery conservatively produces approximately \$250 million annually and sustains around 3,500 family wage jobs across Oregon.

These men and women and the jobs they work generate tax revenue that supports local schools and law enforcement. They sustain property values and enable public investment in vital community resources including parks and libraries. They encourage entrepreneurship, small business development, and tourism. And they foster communal bonds that endure for generations and deliver social value that may be difficult to quantify but is impossible to overstate.

Moreover, the Dungeness crab fishery does not exist in isolation. Rather, it is crucial to the continued success of *all* of Oregon's commercial ocean fisheries. For many in the fleet, including OCCA members, Dungeness crab accounts for more than half of their income. Without that economic anchor, OCCA members would lack the financial ability to invest in capital, maintain their vessels, pay employees, and continue to prosecute other fisheries including groundfish, pink shrimp, and albacore tuna—all of which are economically significant species and dietary staples for many Oregonians. Dungeness crab is likewise the economic linchpin for seafood processors located at ports across Oregon that employ hundreds of Oregonians and deliver fresh seafood to local and export markets.



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In short, the opportunities created by Oregon's Dungeness crab fishery are the backbone of the state's coastal communities from Astoria to Brookings. During the 1990's, the near-total loss of the timber industry at the behest of special interest groups devastated rural communities across Oregon. The loss of Oregon's Dungeness crab fishery that Petitioners advocate would have the same catastrophic effect.

**B. Oregon's Commercial Dungeness Crab Fishery is a Model of Responsible Management and Sustainability.**

Oregon's Dungeness crab fishery is one of the few remaining state-managed fisheries in the United States. Since the establishment of the limited entry system in 1995, Oregon's management of the fishery has developed into a global model of success. Despite consistent large annual harvests, the Dungeness crab population in Oregon has remained stable or grown, primarily through implementation of the "3 S's" strategy—size, sex, and season.

Kate Richerson of NOAA Fisheries' Northwest Fisheries Science Center described the Dungeness crab management strategy as "a perfect fit for [Dungeness crab's] life history because it allows the population to reproduce and grow even with the intensive harvest."<sup>2</sup> The Marine Stewardship Council likewise hailed Oregon's Dungeness crab fishery as "iconic," and "a model fishery in terms of environmental sustainability and working hard to maintain and improve the overall health of the fishery."<sup>3</sup>

Oregon's 2022 Dungeness Crab Fishery Management Plan (the "Plan") proved effective. The Plan sets out three primary management goals:

**Ecological** – Ensure the long-term reproductive capacity of the Dungeness crab population, minimize impacts to other species, and support ecosystem health.

**Social/cultural** – Promote diverse opportunities for present and future generations to harvest, use, or enjoy the Dungeness crab resource.

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<sup>2</sup> West Coast Dungeness Crab Stable or Increasing Even With Intensive Harvest, Research Shows (March 2020), available at <https://www.fisheries.noaa.gov/feature-story/west-coast-dungeness-crab-stable-or-increasing-even-intensive-harvest-research-shows>.

<sup>3</sup> Iconic Oregon Dungeness crab fishery receives MSC sustainability certification (December 2010), available at [https://old.psmfc.org/crab/2010-2011%20Files/OR\\_MSC\\_Cert\\_for\\_OR\\_Dungeness\\_2010.pdf](https://old.psmfc.org/crab/2010-2011%20Files/OR_MSC_Cert_for_OR_Dungeness_2010.pdf).



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**Economic** – Support the economic vitality of the Dungeness crab fishing industry and coastal communities.<sup>4</sup>

Oregon has historically achieved these goals through collaborative management and a culture of good faith stakeholder engagement. But Petitioners reject that process. Instead, they demand that the Commission elevate the *potential* for a marginal reduction in entanglement risk to the detriment of every other primary management goal. Petitioners' tactic is contrary to the balanced management process that has made Oregon a resounding success story.

Oregon's successful management of the Dungeness crab fishery includes a robust mitigation response to entanglement risk. Oregon already mandates reduced effort during peak migration times and imposes corresponding depth restrictions. Oregon applies adaptive management strategies to further reduce entanglement risk and issues fleet advisories when large whales are present. Likewise, Oregon recently implemented rope substitutions and late season tags to improve monitoring and traceability. And Oregon has invested in derelict gear removal that reduces entanglement risk and promotes wider ecological benefits. Many of these measures are contained in the draft CP.<sup>5</sup>

Petitioners' claim that Oregon has failed to respond to entanglement risk in violation of federal law is false. Rather, Oregon continues to be a leader in conservation and adaptive management, while also maintaining fidelity to the State's most basic duty: To protect the social, cultural, and economic welfare of Oregonians. There is no question that Oregon will continue to study and improve its efforts to respond to entanglement risk, just as it responds to other ecological considerations. But that should be done the Oregon way, through good faith engagement with stakeholders, not based on pressure tactics and litigation threats from outside groups that do not share a direct stake in Oregon's future.

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<sup>4</sup> Oregon Dungeness Crab Fishery Management Plan, Oregon Department of Fish and Wildlife Marine Resources Program (March 2022), available at [https://oregondungeness.org/wp-content/uploads/2024/09/Final\\_Dungeness\\_Crab\\_FMP\\_March\\_2022.pdf](https://oregondungeness.org/wp-content/uploads/2024/09/Final_Dungeness_Crab_FMP_March_2022.pdf).

<sup>5</sup> DRAFT Conservation plan for reducing the impact of the Oregon ocean commercial Dungeness crab fishery on ESA-listed species off Oregon, Oregon Department of Fish and Wildlife Marine Resources Program (August 2021), available at [https://www.dfw.state.or.us/MRP/shellfish/commercial/crab/docs/2021/Public\\_CP\\_DRAFT\\_8.18.21.pdf](https://www.dfw.state.or.us/MRP/shellfish/commercial/crab/docs/2021/Public_CP_DRAFT_8.18.21.pdf).



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**C. Oregon's Commercial Fishers Are the State's Most Committed Environmental Stewards and ODFW's Most Reliable Partners.**

Fishing in Oregon is a cherished way of life. Many of Oregon's Dungeness crab permit holders, including OCCA members, come from multi-generational fishing families. Some of them skipper boats passed down from their grandparents. Fishing puts food on their families' tables. It puts clothes on their children's backs and sends them to school. The ability to earn a living at sea is a source of pride, meaning, and accountability: OCCA members want their children and grandchildren to continue the tradition that they inherited. And they understand better than anyone that conservation is crucial to making that future possible.

It is no surprise, then, that Oregon's commercial fishers are the most committed, dependable, and knowledgeable stewards of the State's fisheries. OCCA members have been indispensable partners in ODFW's conservation efforts. Our members collaborate extensively with ODFW, including as members of the Oregon Whale Entanglement Advisory Committee. We are active in derelict gear removal, testing pilot programs, and research collaboration with ODFW, NOAA, and Oregon Sea Grant. Oregon fishers supported implementation of limited entry and pot reduction. The Dungeness crab fleet collaborated in implementing Oregon's nation-leading marine reserve network and cooperates with OSP enforcement efforts.

In short, Oregon's fishermen and women are dedicated to conservation and scientific progress. They are also by far ODFW's closest and most expert partners with actual experience on the water and a deep understanding of what conservation mechanisms are and are not effective in practice. OCCA members are, for example, far more credible than Petitioners in assessing the safety, efficacy, and affordability problems of experimental pop-up gear in Oregon's unique ocean conditions.

It is disappointing for Petitioners to suggest otherwise by rejecting the collaborative forums where we invest our time and resources year in and year out. We have proven time and again that we are committed partners. That relationship of trust should not be set aside lightly by this Commission to appease outside groups that will never be satisfied until our fisheries are shuttered and our coastal communities meet the same fate that our state's logging towns suffered a generation ago.

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**D. Petitioners Are Out-Of-State Special Interest Groups.**

Center for Biological Diversity is from Arizona. Oceana and NRDC are international groups with offices as far flung as New York and New Delhi. The American Cetacean Society is from California. Petitioners' membership may include "online activists" in Oregon.<sup>6</sup> But Petitioners *do not* share the direct communal stake in Oregon's fishery management that is felt by OCCA members and their families. It is important to state plainly that when Petitioners' goals conflict with the needs and values of local communities, Oregonians' welfare is not Petitioners' concern.

**E. Petitioners' Demands are Extreme and Their Petition is a Breach of the Collaborative Management Process.**

To be clear, Petitioners have a seat at Oregon's collaborative management table. Oceana's Ben Enticknap, NRDC's Francine Kershaw, and American Cetacean Society's Joy Primrose are all members of ODFW's Oregon Entanglement Advisory Committee. Petitioners know that Oregon's research and programs to mitigate entanglement risk are ongoing. Petitioners also know that ODFW intends to initiate its own rulemaking this year, and that it is currently finalizing the draft CP for submission to NOAA.

Regrettably, Petitioners reject Oregon's process. The Petition came as a shock and, to OCCA's knowledge, was filed without advance notice to ODFW staff or NOAA. As staff put it in the Agenda Item Summary:

Since the Department is already planning rulemaking, the question of accepting or denying the petition is awkward. . . . Any direction that adds to the planned rulemaking would extend the time to develop rules and bring them to the Commission for consideration. It would also delay implementation of the planned changes which are essential to informing future rulemaking actions.<sup>7</sup>

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<sup>6</sup> Petition at 1.

<sup>7</sup> Agenda Item Summary – Petition to Change Oregon Dungeness Crab Fishery Rules, *available at* [https://myodfw.com/sites/default/files/2026-02/Exhibit%20C\\_Attachment%201\\_Agenda%20Item%20Summary.pdf](https://myodfw.com/sites/default/files/2026-02/Exhibit%20C_Attachment%201_Agenda%20Item%20Summary.pdf).



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Indeed, Petitioners' timing appears specifically designed to divert ODFW's resources and distract from ongoing management efforts.

Worse, Petitioners' proposed rules are extreme. For example, Petitioners demand fishery closure if two entanglements occur anywhere in the world that *may* involve Oregon gear.<sup>8</sup> If, for example, two leatherback sea turtles are entangled in *unidentified* gear off the coast of Mexico, the Commission can bet that Petitioners will demand to close the Dungeness crab season. And while Petitioners claim that conversion to so-called "pop-up gear" would enable the fleet to keep fishing, the truth is that this gear is experimental at best, presents safety risks, has never been commercially tested in Oregon's waters, and is not technologically or economically viable in Oregon.

Petitioners' demands—both in substance and the way in which the demands are asserted—demonstrate Petitioners' disregard for Oregonians' welfare and contempt for the ongoing work of ODFW staff and its stakeholder partners, including OCCA members. Staff put it well in the Agenda Item Summary:

Options for achieving the existing rule's substantive goals while reducing the negative economic impact on businesses were not adequately addressed in the petition. The petition also includes rule changes in advance of and potentially inconsistent with future federal CP approval and issuance of an ITP.

Petitioners, in other words, are unconcerned with the economic harm their demands would cause or their interference with ODFW's work on the draft CP.

The Petition is not a serious effort to improve fishery management consistent with ODFW's strategic priorities. Rather, it is a cudgel to disrupt balanced management and create a pretense for litigation at the expense of Oregonians.

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<sup>8</sup> Petition at 19, *available at* [https://www.dfw.state.or.us/MRP/shellfish/commercial/crab/docs/whale\\_entanglement/11December2025\\_ODFW%20Petition%20for%20Regulation%20Change.pdf](https://www.dfw.state.or.us/MRP/shellfish/commercial/crab/docs/whale_entanglement/11December2025_ODFW%20Petition%20for%20Regulation%20Change.pdf).



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**IV. PETITIONERS' PROPOSED RULES AND SUPPORTING ARGUMENTS LACK MERIT.**

**A. Pop Up Gear is Unproven and Unworkable in Oregon.**

Petitioners want to mandate an experimental gear type known as “pop-up gear.” Specifically, Petitioners propose the following rule:

Effective April 1, 2028, it shall be unlawful to take Dungeness crab for commercial purposes from the Pacific Ocean or Columbia River using conventional gear from April 1 until August 14.<sup>9</sup>

In practice, the proposed rule may as well state that beginning in 2028, Oregon’s Dungeness crab season will close on April 1. The proposed rule would harm the fleet generally but would be especially devastating to small boat owners who depend on strong markets during late season months as fishing effort and catch volume generally decrease overall. Ultimately, this will lead to a reduction in the fleet both in absolute volume and in the diversity of vessel sizes and businesses that it supports. This will, at minimum, significantly concentrate the market, with the resulting economic hardship falling disproportionately on small family-owned businesses for whom Dungeness crab is a lifeline and that simply could not afford pop-up gear even if it was viable from a safety and efficacy standpoint, which is not the case.

For these reasons, Oregon expressly considered and rejected pop-up gear in the draft CP:

[P]op-up gear is very expensive and would require fishery participants to invest in new gear, in addition to, the lost time and revenue associated with initially adapting to running different gear. The absence of a reliable, affordable, and effective option and the need for substantial gear testing present the largest challenges for implementation at this time.<sup>10</sup>

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<sup>9</sup> Petition at 13.

<sup>10</sup> Draft CP at 125, *available at*

[https://www.dfw.state.or.us/MRP/shellfish/commercial/crab/docs/2021/Public\\_CP\\_DRAFT\\_8.18.21.pdf](https://www.dfw.state.or.us/MRP/shellfish/commercial/crab/docs/2021/Public_CP_DRAFT_8.18.21.pdf).



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Thus, the CP concludes, “implementation of a requirement for pop up gear at this time is not practical given the existing technological limitations.”<sup>11</sup>

ODFW’s assessment contained in the draft CP is correct. Pop-up gear is experimental and has *never* been commercially tested in Oregon. Pop-up gear is also incredibly expensive, ranging from tens to hundreds of thousands of dollars per vessel. Banks will not loan that type of money to purchase an asset that is unproved and may hold no value. For most smaller boats that depend on late season fishing, this is cost prohibitive and would effectively put them out of business. There are also serious concerns that pop-up gear would increase derelict gear, increase law enforcement challenges, invite gear conflicts, and create safety issues for trawlers who cannot locate submerged gear.

Petitioners claim that “[f]ield trials and pilot programs have demonstrated the effectiveness of pop-up gear.”<sup>12</sup> But the only “studies” that Petitioners cite are marketing materials and a press release published by the gear’s manufacturer.<sup>13</sup> This is no different than basing smoking policy on a “study” prepared by big tobacco. Moreover, the pilot program Petitioners rely on was done in California, where environmental and commercial conditions differ markedly from Oregon. There is no reliable evidence that pop-up gear would be effective or feasible in Oregon’s fishery. Rather, ODFW has found the opposite. It would be irresponsible for this Commission to entertain even the prospect of imposing a novel gear type that is untested and unproven in Oregon.

Petitioners also insist that “pop-up systems offer economic resilience to fishing communities” by “enabling fishing to continue in areas that would otherwise be closed.”<sup>14</sup> As an initial matter, there is a condescending irony in Petitioners—well-heeled out-of-states NGOs with no commercial fishing experience and no economic dependence on the fishery—dictating to OCCA members what is best for their families’ economic resiliency. More to the point, Petitioners’ argument assumes that the alternative to pop-up gear is area closure. But Oregon has *never* closed an area due to entanglement risk inside the existing depth restrictions. Oregon’s current adaptive management is effective and can be further improved through less

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<sup>11</sup> *Id.* at 146.

<sup>12</sup> Petition at 26.

<sup>13</sup> *Id.* at notes 34–37.

<sup>14</sup> *Id.* at 27.



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burdensome means including increased derelict gear removal. The Commission should reject Petitioners' false choice between reducing effort and mandating an experimental gear type that has not been tested under real-world conditions and is highly problematic on multiple fronts.

As explained by ODFW in the draft CP, pop up gear is technologically and economically unviable. Petitioners' proposal to mandate its implementation over the fleet's unified objection based on a single study in California championed by the gear manufacturer and conducted under conditions that do not map to Oregon's environmental and commercial conditions is counterproductive and extremist.

**B. Rulemaking Regarding Additional Late Season Gear and Depth Restrictions is Unnecessary.**

Petitioners next propose rule changes to move the start date of depth and effort reduction up from May 1 to April 1, to double effort reduction from a 20% pot decrease to 40%, and to further restrict depth to inside 30 fathoms.<sup>15</sup> These proposed rules are yet again contrary to the relevant data and would impose severe unnecessary hardship on OCCA members.

According to Petitioners, "[a] 40% pot limit reduction would likely more than double the conservation benefit to whales."<sup>16</sup> Petitioners cite no evidence to support this claim: It is pure speculation and assumption. In fact, OCCA is not aware of a single entanglement of an endangered animal attributed to late season Oregon Dungeness crab gear. Rather, entanglements that have been attributed to Oregon gear tend to involve derelict gear that the state is already working to manage. The data-driven solution is to increase derelict gear removal efforts substantially, not to impose arbitrary effort and area restrictions.

The proposed rules expose the root of Petitioners' inability to solve problems collaboratively. For Petitioners, the "solution" to entanglement risk is and will always be reduced effort and ultimately closure. That approach is at the core of these groups' ideology. But it contradicts Oregon's balanced conservation management goals, which explicitly prioritize the economic and social welfare of Oregonians. The Commission should be cleared in addressing this fundamental disconnect.

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<sup>15</sup> Petition at 12–13.

<sup>16</sup> *Id.* at 29



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**C. Petitioners’ Notice and Closure Requirements Would Turn Over Dungeness Crab Fishery Management to Extreme Outside Groups.**

Petitioners’ proposed rules regarding public notice and mandatory closures in response to entanglements are perhaps their most extreme demands contained in the Petition. To appreciate their true import, these proposed rules must be read in tandem.

First, the proposed notice rule requires ODFW to immediately publish detailed information regarding “any . . . entanglement in Oregon,” as well as any reported entanglement *anywhere in the world* “where fishing gear or marine debris attributed to the state caused an entanglement.”<sup>17</sup> As a threshold matter, the proposed rule is overbroad, vague, and raises a host of concerning questions. For example, can just anyone make a report? If so, how is the report’s credibility determined, and is credibility even a factor in triggering the notice requirements? Who and what determines whether random “marine debris” found in waters “outside the state” is attributable to Oregon? Why is marine debris—which Petitioners define explicitly as “something other than fishing gear”—being addressed in fishery regulations in the first place? And what determines whether that debris “caused” an entanglement? Petitioners offer no answers to any of these questions.

In practice, the proposed rule would deputize an army of overzealous, underinformed would-be private attorneys’ general. Non-credible reports will proliferate, creating a significant administrative burden and expense to the state. Worse, the rule would exacerbate the risk of injury to unqualified persons incentivized to approach marine mammals—a dangerous practice that both ODFW and NOAA actively discourage.

Second, the problems created by the proposed notice rule metastasize when read alongside Petitioners’ proposed rule requiring closure in response to entanglement. Petitioners’ proposed rule would mandate closure as follows:

- (1) Closure of *at least* one of three sections of the state in response to a single entanglement in Oregon Dungeness crab gear;

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<sup>17</sup> *Id.* at 18.



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- (2) Closure of *at least* one of three sections of the state in response to a second entanglement in *unknown* gear, regardless of whether the gear is in fact from Oregon;
- (3) *Complete statewide closure* in the event of a second entanglement in Oregon Dungeness crab gear; and
- (4) *Preemptive* early closure during the following season in the event of a single out-of-season entanglement.<sup>18</sup>

It is not difficult to predict how this regime would play out in practice. Imagine, for example, that a whale becomes entangled in spiny lobster gear off the coast of Baja California. An online activist wintering in Cabo spots the whale and calls Oceana's New York office, which concludes that the unidentified gear "may" be attributable to Oregon. Oceana promptly reports it to ODFW and demands public notice. The same thing happens again a month later. In this scenario, which has nothing whatsoever to do with Oregon, Petitioners will demand that ODFW immediately close the Dungeness crab season in *at least* one of three sections of the state. More likely, Petitioners will demand statewide closure and, if ODFW refuses, Petitioners will sue.<sup>19</sup>

Consider another scenario: A single humpback whale from an undetermined population becomes entangled in derelict Oregon Dungeness crab gear from a prior season. An OCCA member pulling his pots does the responsible thing and calls ODFW. Again, Petitioners immediately demand that *at least* the area where the report occurred be closed for the remainder of the season. If ODFW objects, Petitioners sue. This process unfolds even though no actively fished gear was involved and no evidence demonstrates that the animal was a member of an ESA-listed population.

In either of the above cases and countless similar scenarios, closing the fishery would have done nothing to prevent the entanglement. Yet that is exactly what Petitioners' proposed rule would require and what Petitioners will demand. ODFW would be forced to either

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<sup>18</sup> See *id.* at 19–20.

<sup>19</sup> Petitioners will object that the mandated closures would only apply to "conventional gear" and that fishing could in theory continue using experimental pop-up gear. As explained above, that argument is a fig leaf because pop-up gear is unproved, unaffordable, and unviable.



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capitulate or face a credible lawsuit that it is violating its own regulations. In the end, closure would be virtually inevitable. Petitioners will tout the “victory” to their out-of-state fundraisers, and Oregonians will lose their livelihoods.

Petitioners’ proposed notice and closure rules make no sense. They are not science based. Rather, they are arbitrary and punitive and will harm Oregon families.

**D. Oregon is Not Violating Federal Law.**

Petitioners represent that Oregon is violating federal environmental law. Petitioners are wrong. Establishing regulatory take under the Endangered Species Act requires plaintiffs to prove that agency action *caused* the foreseeable take of a listed animal.<sup>20</sup> The United States Supreme Court has “squarely rejected . . . that a form of strict liability, unlimited by causal connection, could be imposed.”<sup>21</sup> Indeed, the United States Court of Appeals for the Fifth Circuit in *Aransas Project v. Shaw* specifically rejected the notion—advanced by Petitioners—that “causation exists where a defendant government agency authorized the activity that caused the take,” finding that reasoning no different than insisting that a state “issuing drivers’ licenses will ‘cause the take’ of endangered species run over by cars.”<sup>22</sup>

In other words, while a state’s regulatory scheme can potentially violate the ESA *if* it causes take, that finding is not automatic. Here, Oregon has enacted significant regulatory protections to *prevent* take, including depth restrictions during the spring and summer months, corresponding effort reduction, implementation of derelict gear removal, and publication of fishery advisories. Oregon is also actively pursuing an ITP. Moreover, without confirmation that an entangled animal is from a listed discrete population segment, it is far from clear that Oregon Dungeness crab gear has been or is likely in the future to be involved in the take of a listed animal, let alone that Oregon’s regulatory scheme “caused” that take.<sup>23</sup> In short, Petitioner’s claim that Oregon is currently in violation of federal law is speculative at best. And in any event,

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<sup>20</sup> The Marine Mammal Protection Act does not even authorize citizen suits.

<sup>21</sup> *Aransas Project v. Shaw*, 775 F.3d 641, 657 (5th Cir. 2014).

<sup>22</sup> *Id.* at 659.

<sup>23</sup> Non-listed large whales are common in Oregon’s waters, and it is unreasonable to simply assume that an entanglement involves a listed animal without conducting genetic testing, which is not done.



**Oregon Coast Crab Association**  
PO Box 28  
Newport, OR 97365

the correct response to Petitioners' allegations is simply to complete ODFW's ongoing work to apply for and obtain an ITP, not to entertain Petitioner's extreme rulemaking demands.

**V. LESS BURDENSOME ALTERNATIVES TO THE PETITION ARE AVAILABLE.**

As ODFW put it, "[o]ptions for achieving the existing rule's substantive goals while reducing the negative economic impact on businesses were not adequately addressed in the petition."<sup>24</sup> Staff is correct. In fact, the Petition completely disregards alternatives that would be far more productive and less burdensome. Three concrete steps that ODFW could take and that OCCA strongly supports are discussed briefly below.

**A. Oregon Must Focus Resources on Completing the draft CP and ITP Application.**

Oregon first published the draft CP in 2021. The CP, if approved by NOAA, would cause the issuance of an Incidental Take Permit that would mitigate the alleged basis of Petitioners' legal threats. The fleet has advocated in favor of applying for an ITP, and ODFW has invested substantial resources in the draft CP's development. As recently as April 2025, ODFW reported on its progress to the Oregon Entanglement Advisory Committee as follows:

ODFW has ramped up coordination with NMFS Office of Protected Resources staff in recent months and is now meeting biweekly to ensure that the draft will be adequate and complete when an ITP application is submitted. ODFW is aiming to have an adequate and complete draft by this summer.<sup>25</sup>

ODFW continued that:

[The CP's conservation measures] fall into three categories: avoidance, minimization, and mitigation measures. ODFW has been working to implement most of these measures in recent years and those that require rulemaking are now in place.<sup>26</sup>

In the Agenda Item Summary, ODFW states that "[b]y December 2026, the Department will submit the CP and ITP application package to NOAA Fisheries."

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<sup>24</sup> Agenda Item Summary – Petition to Change Oregon Dungeness Crab Fishery Rules

<sup>25</sup> Meeting Summary – Oregon Entanglement Advisory Committee (April 2025), *available at* [https://www.dfw.state.or.us/MRP/shellfish/commercial/crab/docs/whale\\_entanglement/ODCA\\_C/OEAC\\_Final\\_Meeting\\_Summary\\_4.4.25.pdf](https://www.dfw.state.or.us/MRP/shellfish/commercial/crab/docs/whale_entanglement/ODCA_C/OEAC_Final_Meeting_Summary_4.4.25.pdf).

<sup>26</sup> *Id.*



**Oregon Coast Crab Association**  
PO Box 28  
Newport, OR 97365

Continuing ongoing work on the draft CP and ITP application must be ODFW staff's top priority. Conversely, the Petition is a distraction and accepting it would divert ODFW's limited resources away from this crucial step in ensuring Oregon's conservation objectives and the long-term health of the Dungeness crab fishery.

**B. Derelict Gear Removal is Effective and Should be Prioritized.**

Derelict gear has been involved in entanglements, and its systematic removal is a critical tentpole in Oregon's entanglement risk reduction. Oregon's derelict gear removal program has achieved success to date, but it remains underfunded and underutilized. ODFW should significantly expand the existing derelict gear removal program and the corresponding incentives. It should remove barriers to participation. This is a commonsense solution that will address entanglement risk and provide other ecological benefits without creating economic hardship.

**C. Experimental Fisheries and Gear Trials Remain an Option in the Future.**

OCCA members support innovation. We are not against implementing proactive conservation measures, including gear modification, that are viable and based on sound science. But blindly forcing experimental pop-up gear on the fleet despite serious concerns with its efficacy, safety, and economic viability is not the answer. Rather, ODFW should entertain a marketplace of ideas to compete for future implementation. Ideas that show promise should be tested in experimental fisheries with input from stakeholders that are on the water and understand these issues at a deep level. As always, OCCA members are prepared to assist ODFW and work collaboratively in those efforts. That is the method of fishery management that has made Oregon a leader in sustainability and conservation. The Commission can and should continue to work alongside Oregonians to maintain that status, including by denying the present deeply fraught Petition.

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**Oregon Coast Crab Association**  
PO Box 28  
Newport, OR 97365

**VI. CONCLUSION.**

The petition for rulemaking should be denied.

Respectfully,

**GARY RIPKA**

/s/ Gary Ripka

---

Its: President

**STUART SCHUTTPELZ**

/s/ Stuart Schuttpelz

---

Its: Vice President

**CARI BRANDBERG**

/s/ Cari Brandberg

---

Its: Treasurer

**BRANDON CHESTNUT**

/s/ Brandon Chestnut

---

Its: Secretary

**SEASON LONG**

/s/ Season Long

---

Its: Assistant Treasurer and Secretary

From: F. T. Chan  
E-mail: [chanistan8@gmail.com](mailto:chanistan8@gmail.com)  
Sent on: Monday, February 16, 2026 4:49 PM  
Subject: Crab Fishery Petition

**Comment:**

Please find attached my public comments.

Thank you,

-Francis Chan

Francis Chan, PhD.  
2475 Jefferson Street  
Eugene, OR 97405.

Feb 16<sup>th</sup> 2026

Dear Commissioners,

I have had the good fortune to be a part of Oregon's ocean science community as a researcher and a professor. Part of that privilege is the opportunity to work with Oregon crabbers and the Oregon Dungeness Crab Commission. I write today as a private citizen, but also a scientist who is surprised by the exactitude of the proposed conservation measures. The language of the measures suggests an understanding of their effectiveness that I worry may not be supported by the science at hand. I am not aware of peer-reviewed literature that provides robust predictions of the benefits that the proposed measure will bring in supporting desired whale population trajectories, relative to other factors that impinge on population growth and survival. To me, this gap is inconsistent with my experiences with a fishery that has been strongly in favor of making decisions based on sound science.

The Oregon crab fleet was the first to sound the alarm about the intensification of low oxygen (hypoxic zones). They challenged the scientific community to develop tools that would allow the fleet to build a more complete picture of exposure risks, today and as climate change intensifies. With the active partnership with crabbers, we now have the West Coast's most extensive system for detecting and tracking hypoxia events. This is possible because crabbers deploy dissolved oxygen sensors in their fishing gear and give us a view of the spatial and temporal distribution of ocean change that would otherwise be impossible for researchers to attain. Proposed changes to crabbing opportunities may well affect our ability to make observations necessary to characterize and understand the impacts of climate change across Oregon's coastal ocean.

I, like many Oregonians, favor conservation measures that ensure healthy populations of whales in a healthy ocean ecosystem. I have seen firsthand the innovations and positive solutions that can take place when science, management, and industry work in close partnership. I would urge that the impacts on avenues to find collaborative solutions, and the level of certainty in the science underpinning proposed measures, be weighed with care. If the right science is not in place, let us work together to make that possible.

Respectfully,



Francis Chan, PhD

From: Mary Faith Bell  
E-mail: [MaryFaith.Bell@tillamookcounty.gov](mailto:MaryFaith.Bell@tillamookcounty.gov)  
Sent on: Monday, February 16, 2026 4:49 PM  
Subject: Crab Fishery Petition

**Comment:**

Thank you,



**Mary Faith Bell**  
**TILLAMOOK COUNTY COMMISSIONER, VICE CHAIR**  
BOARD OF COMMISSIONERS OFFICE  
201 Laurel Avenue  
Tillamook, OR 97141  
Phone (503) 842-3403  
Cell (503) 812-6726  
[maryfaith.bell@tillamookcounty.gov](mailto:maryfaith.bell@tillamookcounty.gov)

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Mary Faith Bell  
Tillamook County Commissioner, Vice-Chair  
201 Laurel Avenue | Tillamook, OR 97141

Oregon Fish and Wildlife Commission  
Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

**RE: Opposition to Petition to Revise Commercial Dungeness Crab Fishery Rules (OAR Chapter 635, Division 5)**

Dear Chair Wahl and Esteemed Commissioners:

On behalf of Tillamook County's approximately 27,000 residents, I urgently request that you reject the December 11, 2025, petition seeking drastic changes to Oregon's commercial Dungeness crab fishery regulations. This petition threatens to eliminate a fishing industry that has sustained Tillamook County communities for generations and would devastate the specialized small-boat fleet operating from the Port of Garibaldi—a fleet internationally recognized for producing the highest-quality Dungeness crab in the world.

**Port of Garibaldi: World-Class Quality from Small-Boat Operations**

The Port of Garibaldi operates approximately 20 local boats plus 5-6 out-of-town boats, with up to 60 commercial vessels during seasonal peaks. This is a small-boat fleet—vessels specifically designed for the shallow Tillamook Bay bar that allows quick 1 to 2-day trips rather than week-long voyages required by larger vessels operating from deeper ports.

What makes Garibaldi's fleet extraordinary is not its size, but its quality. The Port of Garibaldi has the lowest Dungeness crab dead loss of any port anywhere—a distinction that has brought experts from around the world to study Garibaldi's crab handling techniques. Our fleet uses modern refrigeration systems, proper water circulation, and aquarium-style crab holding. The result is individually handled, premium-quality seafood that commands premium prices and has earned Garibaldi an international reputation for excellence.

This is not industrial fishing. This is artisanal fishing practiced at the highest level. Our small boats make day trips, deliver fresh products, and maintain quality standards that larger operations cannot match. This business model depends on operational flexibility, responsive management to market conditions, and the ability to fish during optimal weather and crab quality periods.

The petition's mandates would eliminate this model entirely. You cannot operate a small boat day-trip fishery with a 40% gear reduction during the only months when weather and crab quality allow safe operations. You cannot maintain world-class quality standards when arbitrary closure threats prevent business planning and investment.

### **Tillamook County's Fishing Heritage and Economic Reality**

Commercial fishing contributes over \$500 million in personal income to Oregon annually, with Tillamook County representing a significant portion of that economic activity. These are not numbers that can be replaced through tourism or other sectors, this is foundational economic infrastructure.

In Tillamook County the Dungeness crab fishery is the most valuable species economically, generating \$3.08 million in ex-vessel value during the successful 2017-2018 season. This is not abstract economic data—this represents mortgage payments, groceries, school supplies, and family stability for hundreds of Tillamook County families.

### **Economic Devastation for Tillamook County Communities**

The communities of Garibaldi (population 815), Bay City, Rockaway Beach, Manzanita, Nehalem, and Pacific City depend heavily on commercial fishing. These are not large cities with diverse economies—these are small coastal towns where fishing families, processors, marine suppliers, and related businesses form an interconnected economic web.

When processors close, the impacts cascade throughout Tillamook County:

- Fishing families lose not just income but also markets for their catch—even if they could afford to continue fishing, there would be nowhere to sell their crab
- Processor employees lose family-wage jobs in communities with few alternative employment options
- Marine suppliers, fuel docks, repair shops, and gear suppliers lose their customer base
- Restaurants and retailers lose their signature fresh local Dungeness crab—a major tourism draw
- Property values decline as economic activity contracts
- Tax revenues decrease, reducing funding for schools, emergency services, and infrastructure
- The cultural identity of fishing communities disappears as working waterfronts become tourist amenities without authentic maritime activity

### **The Petition's Unworkable Mandates Target Small-Boat Operators**

While the petition claims to address whale entanglement risk, its actual effect would be to eliminate small-boat fishing operations like those in Tillamook County:

**Mandatory Pop-Up Gear by 2028:** Pop-up (ropeless) gear systems cost \$50,000 to \$200,000+ per vessel. Garibaldi's small boat fleet includes vessels often valued at less than these retrofit costs. Banks will not finance unproven technology tested for only one year. Family operators lack capital reserves for self-financing. The result is not adaptation—it is elimination of family-scale operations and consolidation to wealthy corporate operators.

**Technology Failure:** Pop-up gear has not been proven reliable in Oregon’s specific ocean conditions, particularly in the challenging shallow-water, dynamic conditions of Tillamook Bay. Gear retrieval failures would be catastrophic for small operators working on thin margins. Lost gear means lost catch, lost income, and potentially lost vessels for families who cannot absorb major financial losses. The petition provides no insurance mechanism, no compensation for equipment failure, and no recourse for fishermen whose livelihoods are destroyed by mandated but unproven technology.

**40% Gear Reduction During Peak Season:** The petition mandates a 40% gear reduction starting April 1st. For Garibaldi’s small boat fleet, April through June represents the critical fishing window. Weather is most favorable, crab quality is highest, and market prices are premium. These small boats cannot safely operate during November-March winter conditions. A 40% gear reduction during the only viable fishing months does not reduce income by 40%; it could eliminate 60-80% or more of annual income by targeting the brief window when small-boat operations are possible.

For operations already working on thin profit margins, this income loss is not survivable. Small-boat operators cannot absorb 60-80% income reductions and continue paying vessel mortgages, equipment loans, insurance, moorage, maintenance, and family living expenses.

**Arbitrary Closure Provisions:** The petition includes language mandating “subjective conditions of sudden and unpredictable full season closures.” This provision alone would destroy Garibaldi’s fishing industry even if no closures ever occur. No bank will finance a vessel subject to arbitrary closure. No processor will commit to supply contracts with uncertain availability. No young person will enter a fishery that can be shut down without notice or clear criteria. Business uncertainty kills the industry before any regulatory action occurs.

#### **Scientific Questions and the Success of Current Management**

Humpback whale populations along the Oregon coast have increased by over 8% annually in recent scientific studies. This population growth demonstrates that current collaborative management between ODFW and the commercial fishing industry is achieving conservation objectives while sustaining fishing communities.

The petition does not provide clear scientific evidence that:

- Endangered whale populations (specific distinct population segments) are being harmed in Oregon waters
  - Oregon’s Dungeness crab fishery is preventing whale population recovery
  - Current best management practices voluntarily adopted by Oregon fishermen are inadequate
  - The proposed restrictions would provide measurable conservation benefit beyond current management
- Oregon’s commercial crabbers, including Garibaldi’s fleet, have voluntarily adopted best management practices, modified gear to minimize whale interaction risk, and worked collaboratively with ODFW for years. This approach has succeeded—whale populations are increasing. Garibaldi fishermen have demonstrated their commitment to conservation through their actions, not just rhetoric.

Implementing drastic economic restrictions based on worst-case assumptions rather than verified, Oregon-specific scientific evidence represents poor policy that causes demonstrable harm to Tillamook County families without corresponding conservation benefit.

#### **California Groups Targeting Oregon Communities**

This petition was filed by California-based environmental organizations with no stake in Tillamook County’s economy, no accountability to Garibaldi’s fishing families, and no participation in the collaborative management processes that ODFW has developed

They face no consequences. We do. This is Oregon's fishery, communities, businesses, and families. Oregon should manage its resources based on verifiable science in partnership with Oregon stakeholders, not surrender authority to California litigation groups pursuing agendas that ignore local impacts.

### **The Broader Context: Bay Clams and Integrated Fisheries**

Tillamook County's fishing economy includes more than just Dungeness crab. Nearly all commercially harvested Oregon bay clams are landed in Tillamook County, generating over \$2 million in recent years with a 2018 record of \$710,041. The primary market for these clams is Dungeness crab bait.

Eliminate the crab fishery and you eliminate the bay clam market, destroying a second fishery and the families it supports. Similarly, Tillamook County's black rockfish and lingcod fisheries, together account for 85-96% of nearshore harvest and achieved record revenues in 2017—depend on infrastructure, processors, and business relationships sustained by the larger crab fishery.

This is not about one species or one regulation. This is about dismantling an integrated fishing economy that has evolved over generations to support multiple fisheries, quality standards, and community relationships. You cannot selectively eliminate one component without collapsing the entire system.

### **Request for Action**

On behalf of Tillamook County's 27,000 residents, the fishing families of Garibaldi, Bay City, and our coastal communities, and the world-class small boat fleet that has earned international recognition for quality, I respectfully and urgently request that you:

1. REJECT this petition in its entirety. It is economically catastrophic, scientifically questionable, discriminatory against small-boat operators, and procedurally inappropriate
2. MAINTAIN ODFW's current science-based, adaptive management approach developed through collaborative engagement with Oregon's fishing industry
3. REQUIRE comprehensive economic impact analysis before considering any major rule changes affecting the commercial crab fishery, including specific assessment of impacts on small-boat fleets, processing facilities, and economically challenged coastal counties like Tillamook
4. REQUIRE clear, Oregon-specific scientific evidence demonstrating that current collaborative management measures are insufficient
5. ENSURE meaningful consultation with Oregon's fishing industry, including small-boat operators, before implementing any new restrictions that would disproportionately impact artisanal, quality-focused fisheries
6. RECOGNIZE that small-boat, family-scale fishing operations represent Oregon's fishing heritage and produce the highest-quality product. Regulations that favor large corporate operations over small family businesses undermine the character and sustainability of Oregon's fishing industry

In conclusion, Tillamook County's fishing industry has sustained our communities for generations. The Port of Garibaldi has achieved world-class recognition for quality and has the lowest crab dead loss of any port anywhere. Our fishermen have voluntarily adopted best practices and worked collaboratively with ODFW to achieve conservation success, and whale populations prove it.

We cannot survive the elimination of the commercial Dungeness crab fishery based on unproven assumptions, unaffordable mandates, and discrimination against small-boat operators. We have limited economic alternatives. We are asking you to protect Oregon's fishing heritage, Oregon's small businesses, and Oregon's coastal economy.

I stand with Oregon's fishing families, processors, marine businesses, and coastal communities. I urge you to reject this petition in favor of maintaining the collaborative, science-based management that has successfully balanced conservation with economic sustainability.

Respectfully submitted,

Mary Faith Bell  
Tillamook County Commissioner, Vice-Chair

**cc:**

Oregon Legislative Coastal Caucus  
Oregon Coast Crab Association  
Coastal Port Managers  
Port of Garibaldi Commission  
FishHer: Columbia Pacific CommUNITY Alliance  
Tillamook Chamber of Commerce  
Pacific City Nestucca Valley Chamber of Commerce

From: Taunette Dixon  
E-mail: [taunette@hotmail.com](mailto:taunette@hotmail.com)  
Sent on: Monday, February 16, 2026 5:01 PM  
Subject: Crab Fishery Petition

**Comment:**

DocuSign Envelope ID: 36CE192D-E681-4EA6-BCBE-F7D72BA82319

Dear Commissioners,

We are Newport Fishermen's Wives, Inc., a Newport-based Oregon non-profit dedicated to voluntarily aiding and assisting families, relatives, and dependents of commercial fishermen and deceased commercial fishermen. Many of our members and their immediate family participate directly in Oregon's Dungeness crab fishery. We write to encourage this Commission to deny the petition for rulemaking filed by out-of-state groups that would harm our fleet and our communities.

Commercial fishing, and especially the Dungeness crab fishery, is a way of life for us and our families. When you are raised with a bustling port full of fishing boats in your backyard, as many of us were, it engrains a respect for the dedicated men and women who risk their lives for their families, our community, and our traditional fishing industry. It also develops a sense of duty to ensure that conservation efforts are science-based and effective, so that future generations can carry on our traditions.

At Newport Fishermen's Wives, we support our community through multiple efforts. We raise funds to purchase and distribute life jackets. We support local schools. We host educational and community events including an annual blessing of the fleet before the opening of each Dungeness crab season. We work with local and federal agencies to promote maritime safety. And when a member of the fleet is tragically lost at sea, we provide critical communal and in some cases financial support to their families.

Now, we wish to make clear to the Commission our view that this petition would undermine our organization's work. Commercial fishing is dangerous. But losing the ability to fish presents an even graver threat. There is no question that petitioners' extreme rule proposals would put many fishermen out of business, causing lasting damage to our community and support network.

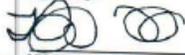
Moreover, the so-called "pop-up gear" advocated by petitioners is unproved and untested in our waters. Fundamentally changing the gear that our fishermen have used for generations should not be taken lightly or done at the behest of special interests that do not understand the complexities of our state's fisheries. In addition to being cost prohibitive for many fleet members, unproven gear can present safety risks.

We are concerned, for example, that gear conflicts could increase substantially due to submerged gear not being visible to trawlers fishing the same waters. Untangling conflicted gear is dangerous work, and anything that increases gear conflict presents a safety concern. At an absolute minimum, these risks require robust study. Our understanding is that petitioners brought this petition to mandate the commercial implementation of experimental pop-up gear in our fishery even though it has never been tested or studied in our waters. For the Commission to even take up consideration of such a proposal in this circumstance would, in our view, be highly irresponsible.

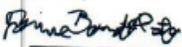
As an organization, Newport Fishermen's Wives supports Oregonians. We value conservation, healthy fisheries, and a healthy and safe fleet. We believe firmly that this petition would do a disservice by undermine the collaborative process that has historically served those goals here in Oregon. We urge the Commission to put Oregonians first and deny the petition.

Respectfully submitted,

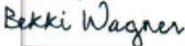
Board of Directors  
Newport Fishermen's Wives, Inc.

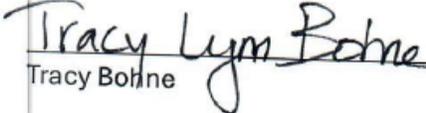
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Becca Bostwick-Terry Date: 2/16/2026

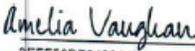
Signed by:   
101A7EB89077402  
Jaunette Dixon Date: 2/16/2026

Signed by:   
E6084112FB9C498  
Denise Barrett-Porter Date: 2/16/2026

Signed by:   
9284502846C3A08  
Cari Brandberg Date: 2/16/2026

Signed by:   
3ECCD0380AC6489  
Bekki Wagner Date: 2/16/2026

  
Tracy Bohne Date: 2/16/24

Signed by:   
3EFC58DFF42841B  
Amelia Vaughan Date: 2/16/2026

DocuSigned by:   
3C86D43E4D1D40E  
Michelle Gomez Date: 2/16/2026

From: Ellen Chapman  
E-mail: [ellen@culturalheritagepartners.com](mailto:ellen@culturalheritagepartners.com)  
Sent on: Monday, February 16, 2026 5:21 PM  
Subject: Crab Fishery Petition

**Comment:**

Commissioners,

Attached is Bryson Burns' written testimony against the petition and late-season Dungeness Crab rules for consideration at your February 20th meeting.

Respectfully,  
Ellen

--

Ellen Chapman, PhD (she/hers)  
Cultural Resources Specialist  
Mobile/Text: 434-327-6663  
Cultural Heritage Partners, PLLC  
1811 East Grace St, Suite A  
Richmond, VA 23223  
[www.culturalheritagepartners.com](http://www.culturalheritagepartners.com)

*This email message and any attachments are confidential and may be privileged. If you are not the intended recipient, please notify us immediately by replying to this message and destroy all copies of this message and any attachments. Thank you.*

Bryson Burns  
Coquille Tribal Member  
F/V *Coho*  
Home Port: Charleston / Coos Bay

*Sent via email*

Chair Wahl and Members of the Oregon Fish and Wildlife (“ODFW”) Commission  
Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

**Re: Opposition to Petition for Additional Commercial Crab Fishery Restrictions**

Commissioners,

My name is Bryson Burns. I am 36 years old, a member of the Coquille Tribe, and a fourth-generation commercial fisherman. I live in Coos Bay, Oregon, and my home port is Charleston/Coos Bay. I have been commercially crabbing for approximately 20 years. My vessel, the *Coho*, typically operates year-round, fishing crab, shrimp, and drag fisheries, and normally carries a captain and four crew members.

I write today to oppose both the *Petition to Adopt New Rules and Amend Oregon Administrative Rules Chapter 635, Division 5* and the *Industry Notice* issued on January 23, 2026, to implement temporary rules for this current crab season effective April 1, 2026. Commercial crabbing accounts for roughly 60% of my annual income. For more than half of each year, crabbing is the sole financial support for my family. Any significant regulatory change directly affects my ability to provide for my household and the families of the crew members who rely on this work. The proposed April 1 restrictions and 30-fathom depth limitation would have a major financial impact on my operation — conservatively a 20% reduction in income. The 30-fathom restriction alone would eliminate access to the majority of productive crab grounds. For many of us, those deeper areas are not optional; they are essential to maintaining a viable business.

In addition, the cost of replacing gear has increased between 15% and 25% in recent years. Oregon crabbers — myself included — have already made significant gear modifications at great expense to our businesses in response to whale entanglement concerns. Before we could even fully complete those transitions, we are now facing the threat of having to completely re-rig our gear yet again. The availability and financing of new gear is not simple, affordable, or guaranteed.

Furthermore, I am concerned that the emergency late-season rules and proposed petition changes are knee-jerk reactions to a very small number of adverse events and do not recognize the significant progress Oregon has made in recent decades to reduce stress on whale populations and

reduce negative interactions with crabbing fleets. Managing a species by focusing on individual interactions rather than population-level sustainability is not sound resource management. Managing to the individual rather than the population is neither practical nor scientifically grounded when population trends show continued growth. The fleet has already taken substantial steps to reduce incidental whale entanglements, and whale populations of concern have continued to expand under current management frameworks. All of these important, big-picture trends indicate there is ZERO need for further arbitrary and capricious restrictions.

Additionally, the petition does not consider or evaluate the potential safety and fisheries pressure problems created by these onerous restrictions. Forcing the entire fleet into a narrow sliver of water along the coast is not a solution. It increases congestion, gear conflict, navigational hazards, safety risks, and concentrated fishing pressure. Compressing fishermen into smaller zones does not improve safety or efficiency — it does the opposite.

As a member of the Coquille Tribe, my family has made a living in these waters longer than anyone can remember. Commercial fishing is not just a job for me — it is a cultural legacy and a way of life passed down through generations. Now, individuals and organizations from outside our state — people I have never met — are using litigious pressure and threats of lawsuits to jeopardize my livelihood and cultural heritage. These actions appear driven not by collaboration or local stewardship, but by outside interests and financial incentives.

From my perspective, this proposal feels like a solution searching for a problem. The changes being considered would create real economic harm to working fishermen like myself and the crews who depend on this fishery, without clear justification that warrants this level of impact.

Making population management decisions primarily to avoid the threat of litigation is not sound policy. Regulatory action should be driven by biological need and measurable conservation outcomes — not by outside pressure or the potential for lawsuits. The negative implications of moving in that direction extend far beyond this single issue. It undermines stakeholder trust, destabilizes long-term planning, and signals that management can be dictated by legal strategy rather than scientific evidence and transparent process.

For those of us whose livelihoods depend on consistent, predictable regulation rooted in sound science, that shift is deeply concerning.

I respectfully ask the Commission to carefully weigh the economic, safety, cultural, and livelihood consequences — as your regulations require — before adopting measures that would significantly reduce access to the resource that sustains my family and many others. The credibility of the ODFW is too important.

Sincerely,  
Bryson Burns

From: Ellen Chapman  
E-mail: [ellen@culturalheritagepartners.com](mailto:ellen@culturalheritagepartners.com)  
Sent on: Monday, February 16, 2026 5:17 PM  
Subject: Crab Fishery Petition

**Comment:**

Commissioners,

Attached is the written testimony of Ryan, Riley, and Wyatt Barrett against the petition and late-season Dungeness Crab rules for consideration at your February 20th meeting.

Respectfully,  
Ellen

--

Ellen Chapman, PhD (she/hers)  
Cultural Resources Specialist  
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**Ryan Barrett and family**  
**F/V *Big Wave* – Owner and Captain**

*Sent via email*

Chair Wahl and Members of the Oregon Fish and Wildlife (“ODFW”) Commission  
Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

**Re: Opposition to Petition for Additional Commercial Crab Fishery Restrictions**

Chair Wahl and Commissioners:

My name is Ryan Barrett. I am a first-generation commercial fisherman and own and captain the F/V *Big Wave* out of Newport, Or. I have been in the commercial fishing industry for over 20 years where I started on the back deck of a Dungeness crab boat. I have two sons who are 17 and 18 years old who have worked with me for the past 5 years. As an enrolled member of the Coos, Lower Umpqua, and Siuslaw Indian Tribe, crabbing is not only my livelihood and my family’s livelihood, but also the continuation of my Nation’s traditional subsistence practices and a way that I exist in relation to the sea and the bounty our Oregon coast provides. I have a deep and long-term concern for the environment of my homeland, and for whale and sea turtle relatives.

I write today to oppose both the *Petition to Adopt New Rules and Amend Oregon Administrative Rules Chapter 635, Division 5* (“Petition”) and the *Industry Notice* issued on January 23, 2026, to implement temporary rules for this current crab season effective April 1, 2026. While I understand and support the need to prevent injury and mortality of our marine mammals and sea turtles, especially those protected under the Endangered Species Act (“ESA”), my experience as a crabber and lifetime Oregon resident tells me that the current proposals are premature and will not be effective. I have concerns about the lack of scientific information underlying these specific proposals and the recent lack of transparency regarding potential entrapment events. Furthermore, these temporary rules and proposal to conduct rulemaking have been implemented without any input from crabbers—and particularly Tribal crabbers—so they do not take into consideration important issues of economic access to this commercial industry for Oregon’s Indigenous peoples, practicalities, and logistics.

Proceeding with this proposed rulemaking at this stage has the potential to end participation in the crabbing industry for thousands of Oregonians, many of them with traditional Indigenous connections to crabbing as a livelihood. I respectfully request that you reject the Petition and to cancel the January 23, 2026 *Industry Notice* until more fulsome scientific justification is provided.

**1. The Petition and Late Season Rules are Premature and Not Supported by Evidence**

To date, the Oregon crabbing community has not been provided with detailed information, such as: DNA identification of federally endangered distinct populations of humpback whales; results

of necropsies performed on stranded whales; detailed information on the entanglements from 2025; or specific evidence regarding Oregon Dungeness crabbing gear and the locations in which they are believed to have entangled endangered whales. This type of information is crucial for ODFW to conduct fact-based rulemaking, and for commercial crabbers to provide meaningful comment. Furthermore, the *Industry Notice* did not provide any justification for how requiring crabbers to purchase late-season tags in addition to their primary season tags would address entanglement risks. The Petition does not present evidence for any late season entanglements. Additionally, the Petition does not provide evidence regarding sea turtle entanglement rates or evidence of Oregon Dungeness crab industry gear contributing to sea turtle entanglements, but still uses federal laws meant to protect sea turtles from entanglements as a justification for the rulemaking. The scientific studies cited by the Petitioners also do not support the types of restrictions that the Petition seeks to implement. For example, Derville et al 2023<sup>1</sup> recommends temporary local closures around predicted areas of high whale densities, rather than a blanket late-season restriction for the entire Oregon coastline like the Petition seeks.

Especially concerning to me, the explicit goal of the Petition is to require that all late-season crabbing be pop-up only by 2028. The Petition states that pop-up gear was 98% effective in tests in California. No tests have yet been done in Oregon conditions, and we request that studies be conducted in Oregon before a rulemaking that makes pop-up gear mandatory is considered, as sea conditions are different here. Additionally, a 98% success rate means that in 2% of cases the gear was not successfully retrieved; the Petition does not provide any information regarding whether the systems ever deploy without a signal or the potential marine risks of lost crabbing gear due to failure of the acoustic system. Furthermore, the 98% success rate claim is exclusively supported by a press release provided by a manufacturer of pop-up gear in California, without reference to any specific scientific studies undertaken to substantiate that number.

I respectfully request that the Commission deny this Petition and allow Petitioners to submit a subsequent version that more fully discloses conclusive scientific evidence regarding the subspecies of whales and sea turtles affected and results of necropsies, to allow the Commission to evaluate whether unauthorized takes of federally endangered whale and sea turtle species during the 2023–2024 and 2024–2025 seasons can be reliably attributed to Oregon Dungeness crab gear **and** whether the proposed Petition changes would functionally address these potential takes. Alternatively, if the Commission has conclusive scientific evidence regarding the subspecies of whales and sea turtles affected, results of necropsies, or whether the proposed Petition changes functionally address these potential takes, I respectfully request that this information be shared with the public.

## **2. These Proposals Create Significant Economic Hardships, But Do Not Address or Acknowledge Them**

I am the sole provider of income for my family of four. My family is fully reliant on the income I earn from commercial fishing with the Dungeness Crab season being the main source of income. I not only have my family to care for financially but also the lives of my four crew members and

their families. Some of my crew has worked for me for almost 10 years on and off and rely on the income they earn while working on the F/V *Big Wave* as a commercial fisherman.

Stricter regulations would not be a small change — they would put my livelihood at serious risk. For small, family-owned vessels like mine, added restrictions could effectively end operations that have been run responsibly for generations and generations to come. The proposal outlined in this petition raises significant safety concerns that could result in serious injury or even loss of life. Requiring the use of long-lined crab pots would create major new expenses, including the need to purchase costly line haulers. Many smaller boats simply do not have the space, stability, or structural capacity to safely operate this type of equipment.

Fishermen have already invested in required color-coded crab line, which is not suitable for hauling long-line gear. Mandating another gear change would impose yet another financial burden on operations that are already stretched thin. Pop-up gear is even more expensive and remains largely untested in Oregon's rough and unpredictable crab grounds. Introducing unproven systems into challenging ocean conditions increases operational risks for crews. These changes would place an overwhelming burden on small, multi-generational fishing businesses. For many of us, this would not be an adjustment — it would mean shutting down entirely.

Additionally, this Petition has not, as required under OAR 137-001-0070, provided "Options for achieving the existing rule's substantive goals while reducing the negative economic impact on businesses." Indeed, the petition does not even acknowledge the significant economic impact on small business represented by this proposed rulemaking. Under OAR 137-001-0018, the Commission must conduct economic analyses on the impacts of the proposed rule and reduce significant adverse effects on businesses to the extent possible for the rule's function. I respectfully urge the Commission to require the Petitioners to provide the required recommendations for achieving the rule's goals while reducing the negative economic impact on businesses, so that this rulemaking does not damage Oregon businesses.

The introduction of emergency late-season requirements at short notice are particularly harmful to me and other crabbers. We expect to see approximately 50% of our income during the late season in typical years and have made investments in gear and staff for the season on the basis of past crabbing income. This year, we have already been burdened with the need to replace our crabbing ropes and now we are being burdened with the requirement to purchase additional late-season tags with less than two months' notice and, regardless of our previous investments, having our maximum catch using conventional gear during the late season reduced by 40%. Since we are not a large commercial operation, the purchase of untested pop-up gear for potentially a single late-season requirement amidst regulatory uncertainty is beyond our means.

This proposed rulemaking threatens to permanently remove my family's ability to engage in commercial crabbing. The Petition's proposal to immediately implement a conventional gear closure for the rest of the fishing season if there is a single confirmed entanglement of an ESA-listed species by Oregon Dungeness crab fishing gear, or two confirmed entanglements of *unknown gear that might be Dungeness crab*, creates such an economic uncertainty that crabbers like myself will need to move away from this livelihood. We cannot rely on the crabbing industry to pay our bills when our ability to make a living could be stripped away for circumstances beyond our control

at any moment. Furthermore, based on the lack of clarity from the 2023–2024 and 2024–2025 seasons regarding the specific species, district population groups, and ESA status of entangled whales, we have concerns that ODFW may in the future make decisions on the basis of potential entrapments of non-endangered or unknown-status whales.

**3. If Late-Season Rules are Implemented, ODFW Should Consult Tribal Nations and Provide Hardship Exemptions to Tribal Crabbers**

Regardless of specific Tribal affiliation, Indigenous crabbers in Oregon have a unique and heightened interest to participate in their traditional subsistence practices. The State of Oregon has recognized this heightened interest through a variety of recent measures to undo previous anti-Tribe measures, such as the restoration of the Confederated Tribes of Siletz Indians’ full hunting and fishing rights and the development of co-management agreements for hunting and fishing licenses between the Confederated Tribes of Siletz Indians, the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians, Cow Creek Band of Umpqua Tribe of Indians, and the Coquille Indian Tribe. As requested by the Confederated Tribe of Coos, Lower Umpqua, and Siuslaw Indians in their February 6<sup>th</sup> letter, we request that the Commission meet with Tribes to discuss cooperative management opportunities with Tribes. If the temporary rules are maintained, we would request that crabbers who are enrolled members of the Tribes in Oregon be exempted from these rules under a hardship exemption.

Thank you for your consideration of my letter.  
Sincerely,

**Ryan Barrett**  
**Coos, Lower Umpqua, and Siuslaw Indian Tribe**  
*F/V Big Wave*

**Riley and Wyatt Barrett (sons of Ryan)**  
**Coos, Lower Umpqua, and Siuslaw Indian Tribe**  
*F/V Big Wave*

From: J Stockfleth  
E-mail: [taterfamily7@gmail.com](mailto:taterfamily7@gmail.com)  
Sent on: Monday, February 16, 2026 4:59 PM  
Subject: Crab Fishery Petition

**Comment:**

Please reject the petition to change the current commercial crab fishing rules. Oregon is already doing it's part to conserve the whales and it is working well!

Julie Stockfleth  
Clatsop County

From: Tiburon Fisheries  
E-mail: [tiburonfisheries@gmail.com](mailto:tiburonfisheries@gmail.com)  
Sent on: Monday, February 16, 2026 8:53 PM  
Subject: Crab Fishery Petition

**Comment:**

Greetings commissioners,

I have been a commercial crab fisherman for more than 30 years and currently own three Oregon Dungeness crab permits (two 300-pot permits and one 500-pot permit). Throughout my career, I have historically fished through the full season ending August 14. I have worked on vessels ranging from 22 feet to 80 feet, and my current boats range from 28 feet to 63 feet.

I consider myself an innovator and have consistently been willing to test new methods that improve both efficiency and sustainability. That approach has served me well across my fishing career. Based on my experience, I believe longlining crab gear is viable across vessel sizes, and I am interested in evaluating pop-up gear to determine whether it can work effectively in Oregon waters. I am not yet convinced of its practicality here, but I am open to testing it.

When this petition became public, I spent significant time thinking about how we arrived at this point and speaking with other permit holders. I have been aware of the Oregon Entanglement Advisory Council (OEAC) since its inception and have applied multiple times to serve on it without success. I believed OEAC was intended to function as a working interface between the environmental petitioners and the commercial fleet.

The sudden emergence of this petition raised serious questions: either the petitioners felt compelled to blindside the state and other stakeholders, or the working relationship within OEAC has broken down such that the petitioners felt they needed to take this action to spur movement and progress. When fishermen approached OEAC representatives for explanation, we received only dismissive responses rather than substantive engagement, including the OEAC reps referring to petitioners as 'terrorists' and insisting that no fishermen talk to them under any circumstances, but that we instead contribute to a fund to litigate with both petitioners and the state. That did not sit well with me.

As a result, I reached out directly to representatives from NRDC and Oceana. They responded, and we have had several productive conversations in recent weeks. Those discussions have made clear that meaningful

progress through OEAC has largely stalled for years, including the failure to advance the draft plan that has remained unaddressed since 2021.

We are now left with two troubling realities: first, a petition that I believe was submitted in good faith, but without the benefit of full industry knowledge and perspective; and second, a faction within the fleet insisting that the response must simply be litigation, without honest examination of how collaboration has failed.

Importantly, the petition also does not fully account for what Oregon's own data show: late-season measures have already successfully mitigated whale entanglement risk from late-season gear. According to ODFW, recent entanglements have been associated with lost early-season gear, not active late-season gear.

To be clear: no evidence suggests that additional late-season restrictions will meaningfully reduce entanglements if the primary problem is early-season lost gear.

That said, I am not here to argue that the petition should be rejected outright. There are workable ideas within it, and whale entanglement is a real issue that deserves serious action.

Many fishermen, myself included, also recognize that the fishery is increasingly overcapitalized. The trend toward fishing deeper each year not only harms sustainability and equitable access, but may also overlap with entanglement risk factors. This creates an opportunity for conservation measures that address both entanglement risk and overcapitalization at the same time.

I would recommend that the Commission accept the petition in part, with the following modifications:

1. Establish a process for pop-up gear authorization, while allowing conventional longline gear in the interim so the fleet can begin adapting as Oregon-specific testing and research occur. This has the added benefit of mitigating the vast majority of vertical lines while we explore pop-up gear and its local application.
2. You can Adjust late-season measures as proposed, but more importantly, implement a meaningful reduction in gear from the start of the season — for example, a 50% reduction from day one — to reduce vertical lines early, where the risk is greatest, while also addressing overcapitalization.
3. Reject a blanket prohibition on conventional gear after 2028. Any transition must include practical carve-outs for nearshore and beach fisheries, where longlining is not feasible in shallow water. The decision to require pop-up gear should be tied to Oregon-relevant data and a collaborative process with industry, now that we have members of industry who are willing to work with environmental stakeholders in good faith.
4. Require prompt public notification of entanglements. I fully support this.
5. Develop a clear and transparent framework for zonal closures, so fishermen understand what triggers closures, what the expectations are, and whether pop-up gear could remain allowable during closure periods.
6. Establish a 75-fathom depth restriction from the start of the season through spring, to address the escalating trend of deeper fishing, which appears correlated with rising entanglement risk and also raises crab conservation concerns.

Based on my conversations with the petitioners, I believe there is genuine mutual interest in building a meaningful partnership to achieve conservation goals through methodical, data-driven measures. The Commission should leave room for that collaboration to develop and produce tangible results, rather than locking in rigid mandates before Oregon has the necessary experience and data.

Thank you for your time and for the opportunity to provide input. I hope the Commission will give fishermen and petitioners alike the chance to work productively toward real solutions, now that good-faith engagement is finally finding its way to the table.

Respectfully,  
Perry Bordeaux

From: Nick Vicino  
E-mail: [Nick.Vicino@currycountyor.gov](mailto:Nick.Vicino@currycountyor.gov)  
Sent on: Monday, February 16, 2026 9:15 PM  
Subject: Crab Fishery Petition

**Comment:**

Hello,

My name is Nick Vicino and I represent Curry County as the Treasurer. Attached is statement of my opposition to the petition to revise the commercial Dungeness Crab Fishery. Please feel free to reach out for any further comment.

Best,

**Nick Vicino**  
Curry County Treasurer  
E-Mail: [Nick.Vicino@currycountyor.gov](mailto:Nick.Vicino@currycountyor.gov)>  
Direct: (541) 247-3299  
Fax: (541) 247-3436  
94235 Moore Street, Ste. 124  
Gold Beach, OR 97444



## Nick Vicino

CURRY COUNTY TREASURER

94235 Moore Street | Suite 124  
Gold Beach, OR 97444  
(541) 247-3203  
[Nick.Vicino@CurryCountyOR.gov](mailto:Nick.Vicino@CurryCountyOR.gov)

February 10<sup>th</sup>, 2026

Oregon Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302  
[odfw.commission@odfw.oregon.gov](mailto:odfw.commission@odfw.oregon.gov)

**Re: Curry County Opposition to December 15, 2025: Petition to Revise Commercial Dungeness Crab Fishery Rules (OAR Chapter 635, Division 5)**

Dear ODFW Chair and Commissioners:

I am writing to you not only as a representative of Curry County, but from the perspective of someone who previously worked in commercial lending within a major financial institution serving our coastal community. My concerns regarding the proposed regulatory changes stem from firsthand experience evaluating the financial realities faced by our local commercial fishing fleet. During my time in banking, I worked directly with vessel owners to secure operating capital, equipment financing, and, during the pandemic, Paycheck Protection Program loans. Through that experience, I gained a clear understanding of how financial institutions assess risk in the commercial fishing industry. Even under current regulations, this sector is widely considered high risk due to income volatility, compressed seasons, market price fluctuations, fuel costs, labor expenses, and ongoing maintenance and repair demands.

When underwriting loans, lenders rely heavily on consistent profit and loss performance, predictable revenue streams, and adequate collateral. Commercial fishing vessels are often the only meaningful collateral available to fleet owners. However, from a banking standpoint, vessels operating on the open ocean present significant liability exposure and depreciation concerns. This reality already makes financing approvals difficult.

If additional seasonal restrictions or operational limitations are implemented, the financial risk profile of these businesses will increase substantially. Reduced opportunity to generate revenue

directly impacts debt service capacity. In turn, lenders become less willing—or entirely unwilling—to extend financing for compliance upgrades, capital improvements, or even routine operating expenses.

Based on industry estimates, many fleets could face costs ranging from \$50,000 to \$200,000 to meet proposed requirements. In many cases, this may exceed the market value of the vessel itself. Most operators would need to finance these costs. Given existing underwriting constraints, it is unlikely that many financial institutions would approve such loans under tighter regulatory conditions.

From a purely financial perspective, these changes could unintentionally restrict access to capital for an already constrained industry. Without access to financing, compliance becomes unrealistic, and long-term viability becomes uncertain. The ripple effects would extend beyond individual vessel owners, impacting processors, suppliers, local employment, and the broader rural economy. I respectfully urge ODFW to carefully consider the lending and capital access implications of these proposals. Regulatory decisions do not exist in isolation; they directly influence how financial institutions evaluate risk and whether rural industries can sustain operations.

Thank you for your time and consideration of this important matter.

Sincerely,

Nick Vicino  
Curry County Treasurer

From: Joy Primrose  
E-mail: [marine\\_lover4ever@yahoo.com](mailto:marine_lover4ever@yahoo.com)  
Sent on: Monday, February 16, 2026 9:21 PM  
Subject: Crab Fishery Petition

**Comment:**

Please find attached a letter regarding Exhibit C: Review of petition related to commercial Dungeness crab fishery rules on the agenda for the February 20, 2026 commission meeting.

Joy Primrose  
American Cetacean Society-Oregon Chapter President  
(541) 517-8754

February 16, 2026

Ms. Mary Wahl, Chair  
Oregon Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

RE: Whale Entanglements in the Oregon Dungeness crab fishery, petition for rulemaking (Exhibit C)

Dear Chair Wahl and Oregon Fish and Wildlife Commission members:

I am writing in support of initiating rulemaking using the science-based measures as requested by the petition to reduce whale and sea turtle entanglements in Oregon's commercial Dungeness crab fishery.

The Oregon commercial Dungeness crab fishery has an ongoing problem of elevated entanglements of endangered and threatened whale species. Despite the current risk reduction measures in place there were three confirmed humpback entanglements in 2024 and four confirmed entanglements in 2025. These humpbacks are from the endangered Central America and threatened Mainland Mexico stocks. It is estimated that only one in five humpback whale entanglements are observed, thus up to thirty-five whales may have been entangled in 2024 and 2025 in the Oregon fishery. The National Oceanic and Atmospheric Administration (NOAA) estimates that 75% of whales entangled in commercial fishing gear ultimately die.

The current Eastern North Pacific gray whale population is estimated at 12,500; this is below the population level at which they were initially listed as an endangered species. The use of pop-up gear in the fishery will be essential to prevent entanglement of gray whales as well.

The current risk reduction measures are not adequate. The unauthorized take of this number of whales results in the fishery being legally out of compliance, a serious situation. This petition strengthens entanglement risk reduction measures.

I realize many in the fishery are concerned with financial impacts as well as the cost of pop-up gear. I carefully considered this during the development of the petition. The larger boats usually exit the fishery by April 1<sup>st</sup>, which also coincides with the return of humpback whales. The overlap between whale presence and the fishery primarily occurs in spring and summer seasons. The 30-fathom depth restriction was initially proposed by Oregon Fish and Wildlife based on the best available science of humpback whale critical habitat, which I am encouraging you to use now by accepting this petition.

The Oregon Dungeness crab fishery, Oregon Fish and Wildlife, and the Oregon Dungeness Crab Commission all promote the Dungeness crab fishery as the most valuable single species commercial fishery in Oregon, bringing in over \$230 million dollars in income to coastal communities. Oregon has consistently been one of the largest producers of Dungeness crab on the west coast. Everyone that profits from this fishery should be held accountable for these entanglements and be responsible for contributing to solutions. Financial support from the entire industry could be used to develop pop-up gear libraries, assist with purchase of pop-up gear, or provide grant funding for the smaller operators affected by this petition.

Accepting this petition will allow ODFW to begin rulemaking to ensure a productive fishery while protecting threatened and endangered whales and sea turtles.

Sincerely,

Joy Primrose

American Cetacean Society-Oregon Chapter President

Oregon Entanglement Advisory Committee Member

From: Sen Weber  
E-mail: [Sen.SuzanneWeber@oregonlegislature.gov](mailto:Sen.SuzanneWeber@oregonlegislature.gov)  
Sent on: Monday, February 16, 2026 9:24 PM  
Subject: Crab Fishery Petition

**Comment:**

Please accept this letter from six coastal Oregon legislators requesting denial of the petition regarding crab gear.

Thank you,  
Katy Cvitanovich  
Chief of Staff  
503.440.0010

for  
*Sen Suzanne Weber*  
Oregon Senate District 16  
Rural Northwest Oregon  
503-300-4493

OREGON STATE LEGISLATURE  
900 COURT ST NE  
SALEM, OREGON 97301



Senator David Brock Smith  
Senator Suzanne Weber  
Senator Dick Anderson  
Representative Boomer Wright  
Representative Court Boice  
Representative Cyrus Javadi

February 15, 2026

Oregon Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

Submitted electronically to: [odfw.commission@odfw.oregon.gov](mailto:odfw.commission@odfw.oregon.gov)

Re: Petition to Amend OAR Chapter 635, Division 5 – Oregon Commercial Dungeness Crab Fishery

Dear Chair and Members of the Commission,

We respectfully urge the Commission to deny the petition filed in December 2025 requesting substantial amendments to OAR Chapter 635, Division 5 related to the Oregon commercial Dungeness crab fishery.

While we support continued, science-based efforts to reduce whale entanglement risk, we do not believe this petition meets the threshold necessary to justify rulemaking through the petition process. The proposed changes are premature, duplicative of ongoing work, and inconsistent with adaptive fisheries management that has long served Oregon and its coastal communities well.

#### **Federal precedent is directly relevant**

In April 2022, the National Marine Fisheries Service (NMFS), acting on behalf of the National Oceanic and Atmospheric Administration (NOAA), denied a petition submitted by the Center for Biological Diversity that raised arguments substantially similar to those presented in the current petition. That petition asserted urgency under the Endangered Species Act and Marine Mammal Protection Act, cited conservative biological reference points, and sought mandatory regulatory triggers.

After review of the best available science, NOAA concluded that West Coast whale populations were stable or increasing, that existing management measures were not impeding recovery, and that the requested regulatory actions were not necessary or appropriate at that time. NOAA emphasized the importance of proportional, science-based decision-making and the use of adaptive management tools rather than rigid, petition-driven mandates.

We believe this federal precedent is instructive and should be carefully considered by the Commission.

#### **The petition duplicates and undermines ongoing Oregon processes**

ODFW and the Commission are already engaged in substantial work to address whale entanglement risk, including development of an experimental or exempted fishing permit framework for pop-up gear, scheduled Commission consideration of additional risk-reduction measures in 2026, and continued coordination with NMFS to finalize Oregon's Conservation Plan and advance toward an Incidental Take Permit under ESA Section 10.

Accepting this petition would preempt these established processes, divert limited agency resources, and risk delaying completion of work that is already underway through transparent, public, and collaborative channels. From a legislative oversight perspective, bypassing these processes is neither efficient nor appropriate.

#### **Coastal economic, safety, and enforcement impacts must be weighed**

The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and is foundational to coastal employment, port infrastructure, and year-round processing capacity. The petition does not include a credible economic or operational analysis commensurate with the scope of the proposed regulatory changes.

Concerns raised by processors and fishery participants include loss of fishing opportunity associated with proposed

seasonal prohibitions, substantial unfunded capital costs related to mandatory gear conversion, safety risks associated with large-scale deployment of untested gear configurations, and unresolved enforcement and gear-conflict challenges. From the perspective of coastal legislators, these impacts are significant. Conservation policy that destabilizes working waterfronts without demonstrated necessity is not sustainable for the communities we represent.

**Adaptive management remains the appropriate framework**

Oregon has already adopted a suite of risk-reduction measures through temporary and permanent rulemaking, including seasonal adjustments, pot reductions, depth restrictions, gear marking requirements, and derelict gear recovery programs. Recent actions for the 2025–26 season demonstrate that ODFW has the authority and flexibility to respond proactively to changing conditions.

We believe it is essential that the Commission retain this adaptive capacity rather than replace it with permanent, inflexible mandates imposed through petition.

**Conclusion**

For these reasons, including federal precedent, duplication of ongoing regulatory work, insufficient analysis of impacts, and the importance of preserving adaptive management, the undersigned Legislative Members respectfully urge the Commission to deny the December 2025 petition as submitted.

Should additional measures warrant consideration, they should proceed through established Commission rulemaking processes, informed by Oregon-specific data, experimental fisheries, and continued coordination with federal partners.

Thank you for your consideration and for your continued stewardship of Oregon’s marine resources and coastal communities.

Sincerely,



Sen. Suzanne Weber



Sen. Dick Anderson



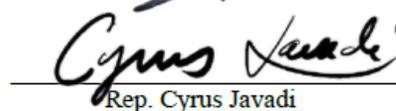
Rep. Court Boice



Sen. David Brock Smith



Rep. Boomer Wright



Rep. Cyrus Javadi

From: Tiffany Pankey  
E-mail: [smithbrosno2@gmail.com](mailto:smithbrosno2@gmail.com)  
Sent on: Tuesday, February 17, 2026 5:03 AM  
Subject: Crab Fishery Petition

**Comment:**

Dear Chair Wahl and Commission members,

To Whom it May Concern,

My name is Brett Pankey and I am an Oregon commercial fisherman, boat owner, crab permit lease holder, and operator. I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery.

I make my living on the water. This is not theoretical for me—it is how I provide for my family, pay my crew, maintain my vessel, and stay part of Oregon’s working waterfront. Every season already carries risk from weather, ocean conditions, fuel costs, and market fluctuations. We plan, invest, and work long hours to manage those uncertainties.

The additional rigid requirements proposed in this petition could create serious financial consequences for small, owner-operated boats like mine. Many of us run on tight margins. Expensive gear changes, reduced fishing opportunity, or mandates that don’t match real-time ocean conditions could make it impossible to stay viable. These decisions don’t just affect individual fishermen—they ripple through deckhands, processors, local businesses, and entire coastal communities.

I care about whale conservation. Fishermen are on the ocean every day, and we have a strong interest in protecting the resource we depend on. Oregon is already implementing practical, science-based measures such as pot reductions, gear marking, depth management, derelict gear removal, and adaptive in-season tools. These approaches allow us to reduce risk while still operating safely and responsibly. Oregon’s adaptive management framework works because it can respond to changing conditions. Replacing that flexibility with permanent, one-size-fits-all mandates would create safety, enforcement, and economic challenges without clear evidence that they are necessary.

The Dungeness crab fishery is the backbone of many small coastal operations like mine. Major changes should be based on Oregon-specific science, real operational knowledge, and collaboration with the fishermen who are directly affected.

For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon’s current, science-based process to continue.

Thank you for your time and consideration.

Sincerely,

Brett Pankey  
F/V Smith Bros No.2

**From:** Tiffany Pankey  
**E-mail:** [tiffanypankey11@gmail.com](mailto:tiffanypankey11@gmail.com)  
**Sent on:** Tuesday, February 17, 2026 5:07 AM  
**Subject:** Crab Fishery Petition

**Comment:**

My name is Tiffany Pankey, and I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery.

I am writing as both an Oregonian, a co boat owner, a mother and a fisherman's wife. This fishery is not just an industry to us, it is how we support our family, stay connected to our coastal community, and carry forward a way of life that has been passed down through generations. The work is already uncertain and demanding, and decisions that remove flexibility can have real impacts on families like mine.

For small boat owners especially, additional rigid mandates could create serious financial fallout. Many of us operate on narrow margins, and reduced opportunity or costly gear changes can mean the difference between staying in business and having to leave the fishery altogether. These are not just economic impacts, they affect families, local processors, and the fabric of working waterfront communities.

I care deeply about whale conservation and believe it can and should be addressed alongside a stable, responsibly managed crab season. Oregon is already taking meaningful, science-based steps to reduce risk through measures like pot reductions, gear marking, depth restrictions, derelict gear programs, and adaptive in-season management.

A similar petition was denied by federal regulators in 2022 after review of the best available science. Oregon is continuing to move forward with its Conservation Plan and federal Incidental Take Permit process, which is the appropriate path for long-term protection and compliance.

The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports working families, small businesses, and coastal economies. Major changes to this fishery should be based on Oregon-specific science and practical realities on the water.

For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's existing, science-based management to continue.

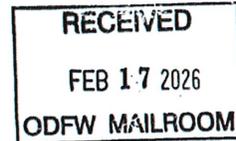
Thank you for your time and consideration.

Tiffany Pankey  
Co Owner F/V Smith Bros No.2  
Newport, OR

**From:** The Miller Family  
**Sent on:** Tuesday, February 10, 2026  
**Subject:** Crab Fishery Petition  
**Comment:**

2/10/26

Topic: Whales



To Whom it may concern:

I am a 3<sup>rd</sup> generation crab fisherman. I own a 40 ft crab boat and own a 500 pot Oregon permit 500 pot Washington crab permit. I am a Oregon crab advisor, WA crab Advisor, OCCA board member and Columbia river Commercial advisor. My father and brother also own crab boats and are actively fishing. The new and up coming rule changes are setting up a billion dollar industry to fail..... When my grandpa fished we weren't talking about new gear types. The reason why, is there is more whales and at a 9% increase per year they becoming a problem. Solution get them off of ESA listing. Close down fishing June 1<sup>st</sup> instead of August. Do not mess with Spring fishery too valuable to fleet. Do not use a un proven pot up gear and threaten hundreds of thousands per boat to be lost not accounting for the harvest lost. Do not use long lines either and cost fisherman time and pot loss with huge tangles. Lastly Do a Derelict gear removal when Spring tags are issued like WA.

Sincerely Aaron Miller

**From:** F/V Cool Change II  
**Sent on:** Tuesday, February 10, 2026  
**Subject:** Crab Fishery Petition  
**Comment:**

F/V Cool Change II  
PO Box 622  
Donald, OR 97020

February 10, 2026

Director Debbie Colbert  
Commissioner Becky Hatfield-Hyde  
Commissioner Mary Wahl  
Commissioner Robert Spelbrink  
Commissioner Mark Labhart  
Commissioner Dallas Hall Defrees  
Commissioner Dave Maldal  
Commissioner Hugh Morrison

Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

Dear Director & Commissioners:

My name is Nick Diede. I've been in the crab industry since 1989 starting as a deckhand and then crabbing my dory, eventually moving up to the 26-foot boat I currently run. I've seen the crab industry change a lot since I started. A 50-foot boat used to be considered a big boat, now it is considered small. The proposed new regulations will affect the small boat industry in the following ways.

First and most importantly, is safety. Bringing crab gear in the month of March can be extremely challenging for a small boat. Due to the weather last year, most of the Garibaldi crab fleet received tickets for not having a landing every two weeks. I want to run my crab gear as much as possible but I'm not willing to risk my life or the life of my deckhand to avoid a ticket. ODFW should not expect anyone to risk their life and boat when weather conditions are dangerous. I've lost friends on the Garibaldi bar.

The new proposed regulations will come close to putting a small boat out of business which will make small boat permits worthless. A lot of older crabbers depend on selling their permit to help with retirement. It doesn't seem fair to participate in a fishery for most of your life to be told you cannot any longer. If the goal is to lower the amount of gear in the summertime, enact the summertime endorsement.

I am also a one-man crab pot manufacturer. I can foresee a drastic reduction in crab pot orders in the future due to the newest regulations. Approximately 40% of my income is derived from this business.

One other thing unrelated to whale entanglements, but relevant to crabbing. I build many crab pots for recreation, guides and charter boats. I incorporate rot cottons in all pots I build but when I see the pot later, the cotton has been replaced with stainless wire. These pots are just as likely to be cut off or moved because of current and swell more so than commercial pots. I feel these pots should have rot cottons in them as well for the good of the resource.

Sincerely,

Nick Diede  
F/V Cool Change II  
971-219-2461  
fvcoolchange2@yahoo.com

**From:** PearlJ Inc.  
**Sent on:** Tuesday, February 11, 2026  
**Subject:** Crab Fishery Petition  
**Comment:**

February 11, 2026

Dear Oregon Fish and Wildlife,

I am writing to formally request that the proposed petition regarding Oregon's commercial Dungeness crab fishing gear policies be halted and not advanced in its current or future form.

While the stated intent of the petition—to reduce entanglement risk and establish new reporting and gear authorization processes—may appear well-intentioned, the practical consequences of the proposed policy would be devastating to Oregon's Dungeness crab fleet and the coastal communities that depend on it.

Under the proposed policy framework, it is estimated that fishermen could lose up to 40% of their crab pots. Such a loss is not a minor operational inconvenience; it would fundamentally undermine the ability of fishermen to continue operating. Fishing with a loss of this magnitude is simply not feasible from an economic or logistical standpoint. Crab pots represent a significant financial investment, and replacing or operating without nearly half of one's gear would place an unsustainable burden on fishermen.

The resulting impacts would extend far beyond individual permit holders. A reduction of this scale would have drastic consequences for fishing families, businesses, processors, and coastal communities throughout Oregon. Businesses, such as: Pacific Rubber, Eugene, OR, Prolift, Boring, OR, Hudson Pacific, Coos Bay, OR, Westcoast metals, Portland, OR, Custom Crab Pots, Eureka, CA, Fleet Pride, Salem, OR and Trilogy Crab Pots, Belling ham, WA and many, more! The economic ripple effects would be felt statewide, including reduced landings, loss of income, job impacts, and decreased availability of Oregon Dungeness crab for consumers.

Additionally, the proposed approach does not adequately reflect the realities of fishing operations, ocean conditions, or the cumulative costs already borne by the fleet through existing regulations and conservation measures. Oregon fishermen have a long history of responsible stewardship and compliance, and further restrictions that jeopardize the viability of the fishery are neither reasonable nor justified.

In the current regulations of the May 1st closure, there has been NO entanglements with Spring fishing tags. The fishermen are not impeding the growth of the whale population. Regulators are telling us that there is an 8-9% growth in whale stocks.

For these reasons, I strongly oppose the establishment of any policy that supports or advances this petition. I respectfully request that this **action be stopped** and that any future discussions meaningfully involve the fishermen and communities who would be directly affected.

I started this fishing business 52 years ago; my son and his son are in the photo. Currently, my two sons and family along with crew members include- Trevor Henderson, Keiffer McEldowney, Dillon Gross. It is decisions like this that could have such a drastic impact on the future of so many like those in this photo.

Thank you for your time and consideration of the serious concerns raised by this proposal.

Jeff Mulkey,  
Jorgen Mulkey,  
Waylon Mulkey,  
F/V Pearl J and Pacific Marit



## EXHIBIT C

### SUPPLEMENTAL PUBLIC CORRESPONDENCE

Received February 10, 2026, to February 17, 2026

**Subject: Comment Submission from Center for  
Biological Diversity Supporters**

528 individuals submitted the attached letter  
*(E-mail & List Attached)*

43 individuals submitted additional comments;  
these comments are attached.

**From:** Fabiola Delgado <[FDelgado@biologicaldiversity.org](mailto:FDelgado@biologicaldiversity.org)>  
**Sent:** Tuesday, February 10, 2026 11:49 AM  
**To:** ODFW Commission \* ODFW <[odfw.commission@odfw.oregon.gov](mailto:odfw.commission@odfw.oregon.gov)>  
**Subject:** Comment Submission From Center for Biological Diversity Supporters

You don't often get email from [fdelgado@biologicaldiversity.org](mailto:fdelgado@biologicaldiversity.org). [Learn why this is important](#)

Dear Commissioners,

Please see attached 571 comments from Center for Biological Diversity supporters urging you to take action to protect precious marine life from entanglement to prevent extinction.

For the Wild,

Fabiola Delgado

*Senior Digital Production Staff*

CENTER for BIOLOGICAL DIVERSITY

P.O. Box 710 Tucson, AZ 85702

(928) 315-9919

[fdelgado@biologicaldiversity.org](mailto:fdelgado@biologicaldiversity.org)

## Comment

Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take - IMMEDIATELY - the action I describe below to protect magnificent sea life in Oregon waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

<b>First Name</b>	<b>Last Name</b>	<b>City</b>	<b>State/ Province</b>	<b>Zip/ Postal</b>	<b>Subject</b>	<b>Date Submitted</b>
Theodore	Bayer	Bend	OR	97703	PROTECT Whales and Sea Turtles in OR Waters	2/7/2026
Krista	Reynolds	West Linn	OR	97068	Protect whales and sea turtles in Oregon by preventing entanglements	2/2/2026
Therese	Campbell	Eugene	OR	97401	Protect whales and sea turtles in Oregon	2/3/2026
Gret	Rowe	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/3/2026
Janet	Sleath	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/2/2026
Jean	Dodier	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/5/2026
Wanda	Meck	Eugene	OR	97401	Protect whales and sea turtles in Oregon	2/3/2026
Angela	Cloutier	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/3/2026
Diane	Venbergh	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/7/2026
Jane	Burch-Pesses	Hillsboro	OR	97123	Protect whales and sea turtles in Oregon	2/3/2026
Ann	Wichmann	Falls City	OR	97344	Protect whales and sea turtles in Oregon	2/3/2026
C	Rudolph	Tillamook	OR	97141	Protect whales and sea turtles in Oregon	2/2/2026
Carolyn	Giles	Portland	OR	97205	Protect whales and sea turtles in Oregon	2/2/2026
Chuck	Gehling	Hood River	OR	97031	Protect whales and sea turtles in Oregon	2/3/2026
Blaine	Vogt	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/2/2026
Teresa	DeLorenzo	Astoria	OR	97103	Reform Fishing Gear to Save Whales and Sea Turtles!	2/2/2026
Isabelle	Rhodes-Flanary	Fairview	OR	97024	Protect whales and sea turtles in Oregon	2/2/2026
Colleen	Whalen	Coos Bay	OR	97420	Protect whales and sea turtles in Oregon	2/2/2026
Stacy	Moranville	Salem	OR	97317	Protect whales and sea turtles in Oregon	2/2/2026
Matthew	Barmann	Hood River	OR	97031	Protect whales and sea turtles in Oregon	2/3/2026
Kathleen	Ruiz	Seaside	OR	97138	Protect whales and sea turtles in Oregon	2/2/2026
Alison	Pitale	Beaverton	OR	97003	Protect whales and sea turtles in Oregon	2/2/2026
Tracy	Richards	Clackamas	OR	97015	Protect whales and sea turtles in Oregon	2/2/2026
Vincent	Alvarez	Portland	OR	97222	Protect whales and sea turtles in Oregon	2/2/2026
Linda	Hendrix	Bend	OR	97702	Protect whales and sea turtles in Oregon	2/2/2026
Donna	Sharp	Veneta	OR	97487	Protect whales and sea turtles in Oregon	2/8/2026
Craig	Emerick	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/3/2026
Jane	Jones	Milton Freewater	OR	97862	Protect whales and sea turtles in Oregon	2/3/2026
Donna	Grubbs	The Dalles	OR	97058	Protect whales and sea turtles in Oregon	2/7/2026
William	Lynn	Oregon City	OR	97045	Protect whales and sea turtles in Oregon	2/2/2026
Rebecca	Picton	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/2/2026
D	Stirpe	Portland	OR	97214	Protect whales and sea turtles in Oregon waters	2/3/2026
Czora	Pagsolingan	Gresham	OR	97080	Protect whales and sea turtles in Oregon	2/3/2026
Corinne	Sherton	Salem	OR	97306	Protect whales and sea turtles in Oregon	2/5/2026
Denise	Ortega	Brookings	OR	97415	Protect whales and sea turtles in Oregon	2/2/2026
Katie	Gwynn	Portland	OR	97212	Protect whales and sea turtles in Oregon	2/2/2026
Jaylen	Schmitt	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/2/2026
Emily	Platt	Portland	OR	97202	Protect whales and sea turtles in Oregon	2/4/2026
Gayle	Agee	Willamina	OR	97396	Protect whales and sea turtles in Oregon	2/2/2026
Alain	Gauthier	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/2/2026
Laurie	Fisher	Portland	OR	97224	Protect whales and sea turtles in Oregon	2/2/2026
Brett	Baumann	Lake Oswego	OR	97034	Protect whales and sea turtles in Oregon	2/3/2026
Mary	Callison	Bend	OR	97701	Protect whales and sea turtles in Oregon	2/2/2026
April	Atwood	Portland	OR	97202	Protect whales and sea turtles in Oregon	2/2/2026
David	Labby	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/2/2026
Gary	Bell	Oregon City	OR	97045	Protect whales and sea turtles in Oregon	2/2/2026
Katherine	Bettis	Portland	OR	97222	Protect whales and sea turtles in Oregon	2/2/2026
Karen	horton	Independence	OR	97351	Protect whales and sea turtles in Oregon	2/3/2026
John	Herberg	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/3/2026

Samantha	Peterson	Astoria	OR	97103	Protect whales and sea turtles in Oregon	2/3/2026
Carla	Earl	Redmond	OR	97756	Protect whales and sea turtles in Oregon	2/2/2026
Pavla	Zakova-Laney	Albany	OR	97322	Protect whales and sea turtles in Oregon	2/2/2026
Esther	Friedman	Salem	OR	97302	Protect whales and sea turtles in Oregon	2/5/2026
Frank	Rouse	Colton	OR	97017	Protect whales and sea turtles in Oregon	2/4/2026
Julie	Redman	Eugene	OR	97401	Protect whales and sea turtles in Oregon	2/3/2026
Beth	Levin	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/2/2026
Donna	Harris	Bend	OR	97707	Protect whales and sea turtles in Oregon	2/6/2026
Debbie	Kreuser	Beaverton	OR	97007	Protect whales and sea turtles in Oregon	2/2/2026
Patricia	Aker	Portland	OR	97223	Protect whales and sea turtles in Oregon	2/2/2026
Leslie	Harper	North Bend	OR	97459	Protect whales and sea turtles in Oregon	2/3/2026
Amber	Star	Grants Pass	OR	97527	Protect whales and sea turtles in Oregon	2/3/2026
Blaine	Ackley	Hillsboro	OR	97124	Protect whales and sea turtles in Oregon	2/2/2026
SUSAN	DICKMAN	Happy Valley	OR	97086	Protect whales and sea turtles in Oregon	2/3/2026
Robert	Thornhill	Clackamas	OR	97015	Protect whales and sea turtles in Oregon	2/2/2026
Satya	Vayu	Portland	OR	97215	Protect whales and sea turtles in Oregon	2/2/2026
Katie	Haldeman	Bend	OR	97701	Protect whales and sea turtles in Oregon	2/2/2026
Eileene	Gillson	Sherwood	OR	97140	Protect whales and sea turtles in Oregon	2/2/2026
Katherine	Smith	Grants Pass	OR	97527	Protect whales and sea turtles in Oregon	2/3/2026
S	Hansen	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/2/2026
Sky	Yeager	Philomath	OR	97370	Protect whales and sea turtles in Oregon	2/2/2026
Elan	Morin	Springfield	OR	97477	Protect whales and sea turtles in Oregon	2/2/2026
Virginia	Thurman	Mcminnville	OR	97128	Protect whales and sea turtles in Oregon	2/2/2026
Julie	Richards	Clackamas	OR	97015	Protect whales and sea turtles in Oregon	2/2/2026
Mary	Thiel	Portland	OR	97266	Protect whales and sea turtles in Oregon	2/2/2026
Casey	Neill	Portland	OR	97212	Protect whales and sea turtles in Oregon	2/2/2026
Becky	stephenson	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/2/2026
Nina	French	Portland	OR	97220	Protect whales and sea turtles in Oregon	2/2/2026
Nancy	Haas	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/3/2026
Donnella	Wills	Sherwood	OR	97140	Protect whales and sea turtles in Oregon	2/3/2026
Susan G	Rives-Denight	Pendleton	OR	97801	Protect whales and sea turtles in Oregon	2/3/2026
Benton	Elliott	Eugene	OR	97401	As A 50-Year Oregonian, I Support Protecting Whales And Sea Turtles In Oregon. I Hope You Will Too. Please Take Action. It is The Least We Can Do.	2/2/2026
Linda	Carlson	Veneta	OR	97487	Protect whales and sea turtles in Oregon	2/3/2026
Bob	Hannigan	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/2/2026
Sally	Keller	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/3/2026
Robert	Gibson	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/2/2026
Robert	albee	Williams	OR	97544	Protect whales and sea turtles in Oregon	2/7/2026
Stephen	Gerould	Portland	OR	97239	Protect whales and sea turtles in Oregon	2/3/2026
Teresa	Schmidt	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/4/2026
Rachel	Cairns	Halfway	OR	97834	Protect whales and sea turtles in Oregon	2/2/2026
Nora	Polk	Portland	OR	97206	Protect whales and sea turtles in Oregon	2/3/2026
Tamara	Wecker	Portland	OR	97223	Protect whales and sea turtles in Oregon	2/2/2026
Jim	Wells	Medford	OR	97501	Protect whales and sea turtles in Oregon	2/2/2026
Lisa	Graham	Madras	OR	97741	Protect whales and sea turtles in Oregon	2/2/2026
ROBERT	PLATA	Salem	OR	97302	Protect whales and sea turtles in Oregon	2/2/2026
Neil	Friedman	Westfir	OR	97492	Protect whales and sea turtles in Oregon	2/2/2026
Alex	Prentiss	Beaverton	OR	97007	Protect Whales and Sea Turtles: Use of Pop-up Gear and Limit Fishing During Migration	2/2/2026
G	Whiting	Joseph	OR	97846	Protect whales and sea turtles in Oregon	2/2/2026
Mira	Wiegmann	Portland	OR	97225	Protect whales and sea turtles in Oregon	2/3/2026
Jim	May	North Bend	OR	97459	Protect whales and sea turtles in Oregon	2/2/2026
David	Klingensmith	Eugene	OR	97401	Protect whales and sea turtles in Oregon	2/3/2026
Jessalynn	Jones	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/3/2026

Nancy	Marshall	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/2/2026
Lee	Zucker	Eugene	OR	97403	Protect whales and sea turtles in Oregon	2/3/2026
michele	dickson	Portland	OR	97223	Protect whales and sea turtles in Oregon	2/2/2026
Kristy	Giles	Clackamas	OR	97015	Protect whales and sea turtles in Oregon	2/3/2026
Allison	Koeper	Portland	OR	97229	Protect whales and sea turtles in Oregon	2/3/2026
Paul	Simon	Beaverton	OR	97007	Protect whales and sea turtles in Oregon	2/2/2026
Julie	Sherman	Portland	OR	97217	Protect whales and sea turtles in Oregon	2/3/2026
Sara	Pritt	Eugene	OR	97401	Protect whales and sea turtles in Oregon	2/2/2026
Richard	McCombs	Toledo	OR	97391	Protect whales and sea turtles in Oregon	2/2/2026
Trace	Sexton	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/5/2026
Shelley	Baker-Gard	Portland	OR	97202	Protect whales and sea turtles in Oregon	2/2/2026
Jennifer	McDaid	Lostine	OR	97857	Protect whales and sea turtles in Oregon	2/3/2026
melanie	feder	Philomath	OR	97370	Protect whales and sea turtles in Oregon	2/2/2026
Larry	Morningstar	Talent	OR	97540	Protect whales and sea turtles in Oregon	2/2/2026
Lynn	Cross	Bend	OR	97701	Protect whales and sea turtles in Oregon	2/3/2026
Jacqueline	Glyde	Portland	OR	97220	Protect whales and sea turtles in Oregon	2/2/2026
Sarah	Welte	Beaverton	OR	97007	Protect whales and sea turtles in Oregon	2/2/2026
Eva	Tomlinson	Portland	OR	97219	Protect whales and sea turtles in Oregon	2/2/2026
Anna	Cowen	Oregon City	OR	97045	Protect whales and sea turtles in Oregon	2/2/2026
Margaret	Stephens	Salem	OR	97301	Protect whales and sea turtles in Oregon	2/2/2026
John	Tangney	Happy Valley	OR	97086	Protect whales and sea turtles in Oregon	2/2/2026
RANDALL	GICKER	Blue River	OR	97413	Protect whales and sea turtles in Oregon	2/3/2026
Matt	Laubach	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/3/2026
Luanne	Mierow	Beavercreek	OR	97004	Protect whales and sea turtles in Oregon	2/3/2026
Laury	Benson	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/2/2026
Linda	Donnelly	Salem	OR	97301	Protect whales and sea turtles in Oregon	2/2/2026
David	Cross	Portland	OR	97219	Protect whales and sea turtles in Oregon	2/2/2026
Kathleen	Roche	Bend	OR	97701	Protect whales and sea turtles in Oregon	2/8/2026
Sue	Lundquist	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/2/2026
Becky	Johnson	La Pine	OR	97739	Protect whales and sea turtles in Oregon	2/2/2026
Monique	Williams	West Linn	OR	97068	Protect whales and sea turtles in Oregon	2/2/2026
Marilyn	Costamagna	Medford	OR	97504	Protect whales and sea turtles in Oregon	2/2/2026
Kelly	Hibbert	Roseburg	OR	97470	Protect whales and sea turtles in Oregon	2/2/2026
Victoria	Eells	Gold Beach	OR	97444	Protect whales and sea turtles in Oregon	2/3/2026
Hadley	de Terre	Jacksonville	OR	97530	Protect whales and sea turtles in Oregon	2/3/2026
David	Flaskerud	Sandy	OR	97055	Protect whales and sea turtles in Oregon	2/2/2026
Tracina	Stewart	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/2/2026
Laur	Strickland	Portland	OR	97225	Protect whales and sea turtles in Oregon	2/2/2026
Kendre	Hone	Monmouth	OR	97361	Protect whales and sea turtles in Oregon	2/2/2026
Sherry	Monie	Damascus	OR	97089	Protect whales and sea turtles in Oregon	2/2/2026
Michael and Karen	Burmester	Happy Valley	OR	97086	Protect whales and sea turtles in Oregon	2/2/2026
Rick	Severson	Lake Oswego	OR	97035	Protect whales and sea turtles in Oregon	2/2/2026
Marion	Hadden	Jacksonville	OR	97530	Protect whales and sea turtles in Oregon	2/2/2026
Cathie	Batavia	Portland	OR	97229	Protect whales and sea turtles in Oregon	2/2/2026
Janette	Wells	Bend	OR	97702	Protect whales and sea turtles in Oregon	2/2/2026
Katherine	McKnight	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/2/2026
Sheila	Dooley	Mosier	OR	97040	Please protect whales and sea turtles in Oregon!	2/2/2026
Sandy	Kuhns	Corvallis	OR	97333	Protect whales and sea turtles in Oregon	2/2/2026
Carla	Williams	Cottage Grove	OR	97424	Protect whales and sea turtles in Oregon	2/5/2026
Cynthia	Chrystal	Bend	OR	97702	Protect whales and sea turtles in Oregon	2/2/2026
Sally	Maish	Roseburg	OR	97471	Protect whales and sea turtles in Oregon	2/2/2026
Margaret	Quentin	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/4/2026
Grant	Fujii	Portland	OR	97203	Protect whales and sea turtles in Oregon	2/3/2026
Carla	Marting	West Linn	OR	97068	Protect whales and sea turtles in Oregon	2/3/2026
Brent	Rocks	Portland	OR	97201	Protect whales and sea turtles in Oregon	2/2/2026

Susan	Harris	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/2/2026
J	Díaz	Albany	OR	97321	Protect whales and sea turtles in Oregon	2/2/2026
Tung	Vu	Portland	OR	97230	Protect whales and sea turtles in Oregon	2/2/2026
Bryce	Hutchinson	Rogue River	OR	97537	Protect whales and sea turtles in Oregon	2/2/2026
Kirstin	Litchfield	Gladstone	OR	97027	Protect whales and sea turtles in Oregon	2/5/2026
Alice	west	Portland	OR	97215	Protect whales and sea turtles in Oregon	2/3/2026
Jennifer	Abernathy	La Pine	OR	97739	Protect whales and sea turtles in Oregon	2/3/2026
Kate	Busby	Portland	OR	97206	Whales and Sea Turtles Need Protection in Oregon	2/5/2026
Cristy	Murray	Oregon City	OR	97045	Protect whales and sea turtles in Oregon	2/2/2026
Elizabeth	Mitchell	Eugene	OR	97404	Protect whales and sea turtles in Oregon	2/2/2026
Marie	Wakefield	Newport	OR	97365	Protect whales and sea turtles in Oregon	2/2/2026
Michelle	Bienick	Grants Pass	OR	97527	Oregon Fish and Wildlife--Do your JOB!!!	2/2/2026
Susan	Wechsler	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/2/2026
Sandra	Joos	Portland	OR	97239	Protect whales and sea turtles in Oregon	2/2/2026
Dvora	Robinson	Portland	OR	97206	Protect whales and sea turtles in Oregon	2/3/2026
Lora	Meisner	Salem	OR	97306	Protect whales and sea turtles in Oregon	2/2/2026
Anna	Mirocha	Tucson	AZ	85701	Protect whales and sea turtles in Oregon	2/2/2026
Craig	tyrka	Elmira	OR	97437	Dear Fisherman's Market and Newman's Grotto!! Protect whales and sea turtles in Oregon	2/2/2026
Michelle	Casey	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/2/2026
Debra	Rehn	Portland	OR	97202	Protect whales and sea turtles in Oregon	2/2/2026
Martha	Lawler	La Pine	OR	97739	Protect whales and sea turtles in Oregon	2/5/2026
Patsy	Shuler	Eugene	OR	97401	Protect whales and sea turtles in Oregon	2/2/2026
Gitanjali	Hursh	Portland	OR	97206	Protect whales and sea turtles in Oregon	2/2/2026
Anna	Wessinger	Bend	OR	97707	Protect whales and sea turtles in Oregon	2/2/2026
Paige	Geschrey	Portland	OR	97225	Protect whales and sea turtles in Oregon	2/2/2026
Roberta	Leach	Eugene	OR	97408	Protect whales and sea turtles in Oregon	2/7/2026
Anne	Vincent	Jacksonville	OR	97530	Protect whales and sea turtles in Oregon	2/3/2026
Robert	Phillips	Medford	OR	97501	Protect whales and sea turtles in Oregon	2/2/2026
M E	ORourke	Depoe Bay	OR	97341	Protect whales and sea turtles in Oregon	2/2/2026
Stéphanie	Rossenu	Beaverton	OR	97005	Protect whales and sea turtles in Oregon	2/4/2026
MariBeth	Doran	Salem	OR	97302	Protect whales and sea turtles in Oregon	2/2/2026
Alice	Lentz	Baker City	OR	97814	Protect whales and sea turtles in Oregon	2/5/2026
Judy	Kemp	Lorane	OR	97451	Protect whales and sea turtles in Oregon	2/4/2026
Carl	Tegethoff	Siletz	OR	97380	Protect whales and sea turtles in Oregon	2/2/2026
Marina	Soto	Portland	OR	97202	Protect whales and sea turtles in Oregon	2/2/2026
Suzanna	Davis	Medford	OR	97504	Protect whales and sea turtles in Oregon	2/2/2026
Debra	Culwell	Gresham	OR	97030	Protect whales and sea turtles in Oregon	2/3/2026
Michael	Sauber	Mcminnville	OR	97128	Protect whales and sea turtles in Oregon	2/3/2026
Patty	O'Blisk	Portland	OR	97221	Protect whales and sea turtles in Oregon	2/2/2026
Julia	Yoder	Oakridge	OR	97463	Protect whales and sea turtles in Oregon	2/7/2026
Alicia	Mehlis	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/9/2026
Isabel	Ortiz	Portland	OR	97229	Protect whales and sea turtles in Oregon	2/4/2026
Scott	Manzano	Silverton	OR	97381	Protect whales and sea turtles in Oregon	2/3/2026
La	Dory	Eugene	OR	97402	Protect whales and sea turtles in Oregon	2/4/2026
Charlie	Graham	Hillsboro	OR	97124	Protect whales and sea turtles in Oregon	2/2/2026
Rachel	Lamson	Portland	OR	97239	Protect whales and sea turtles in Oregon	2/5/2026
Steph	Spencer	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/2/2026
Mose	Oppenheimer	Portland	OR	97214	Protect whales and sea turtles in Oregon	2/3/2026
Dennis	Hoerner	Eugene	OR	97403	Protect whales and sea turtles in Oregon	2/2/2026
James	Strickler	Portland	OR	97203	Protect whales and sea turtles in Oregon	2/2/2026
Cheryl	Warren	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/9/2026
Judith	Mercer	Roseburg	OR	97471	Protect whales and sea turtles in Oregon	2/2/2026
David	Kelley	Gresham	OR	97080	Protect whales and sea turtles in Oregon	2/2/2026
Kimm	Carter	Eugene	OR	97402	Protect whales and sea turtles in Oregon	2/4/2026

Thomas	Otten	Portland	OR	97239	Protect whales and sea turtles in Oregon	2/2/2026
Peg	Reagan	Gold Beach	OR	97444	Protect whales and sea turtles in Oregon	2/2/2026
Elisabeth	Cat	Hebo	OR	97122	Protect whales and sea turtles in Oregon	2/4/2026
Sandra	Pocholec	Veneta	OR	97487	Protect whales and sea turtles in Oregon	2/7/2026
Sheila	Martin	Astoria	OR	97103	Protect whales and sea turtles in Oregon	2/3/2026
Niall	Carroll	Astoria	OR	97103	Protect whales and sea turtles in Oregon	2/3/2026
María	Nazzaro	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/3/2026
Kathy	Jones	Portland	OR	97206	Protect whales and sea turtles in Oregon	2/2/2026
Heather	Marsh	Lake Oswego	OR	97035	Protect whales and sea turtles in Oregon	2/2/2026
Elizabeth	Menetrey	Astoria	OR	97103	Protect whales and sea turtles in Oregon	2/2/2026
Wanda L.	Nelsen	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/2/2026
Tammy	Causey	Jefferson	OR	97352	Protect whales and sea turtles in Oregon	2/3/2026
Merrill	A	Portland	OR	97232	Protect whales and sea turtles in Oregon	2/2/2026
John	Easterday	Portland	OR	97229	Protect whales and sea turtles in Oregon	2/3/2026
Mary Beth	Davenport	Florence	OR	97439	Protect whales and sea turtles in Oregon	2/2/2026
Lin	Marie	Newport	OR	97365	Protect whales and sea turtles in Oregon	2/4/2026
David	Jaffe	Portland	OR	97225	Protect whales and sea turtles in Oregon	2/2/2026
Jennifer	Will	Bend	OR	97701	Protect whales and sea turtles in Oregon	2/2/2026
Richard	Crawford	Bend	OR	97707	Protect whales and sea turtles in Oregon	2/2/2026
Janna	piper	Portland	OR	97293	Protect whales and sea turtles in Oregon	2/3/2026
Denny	Duncan	Lincoln City	OR	97367	Protect whales and sea turtles in Oregon	2/2/2026
Jeri	Iversen	Astoria	OR	97103	Protect whales and sea turtles in Oregon	2/2/2026
Joan	Worthy	Oregon City	OR	97045	Protect whales and sea turtles in Oregon	2/2/2026
MARJORIE E	PETERSON	Medford	OR	97501	Protect whales and sea turtles in Oregon	2/2/2026
Meaghan	Doherty	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/2/2026
Valerie	Adell	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/2/2026
Dorothy	Louis	Albany	OR	97322	Protect whales and sea turtles in Oregon	2/2/2026
Kristin	Smith	Portland	OR	97209	Protect whales and sea turtles in Oregon	2/2/2026
Elizabeth	Edwards	Cloverdale	OR	97112	Protect whales and sea turtles in Oregon	2/2/2026
Carey	McIntyre	Portland	OR	97203	Protect whales and sea turtles in Oregon	2/3/2026
Marjorie	Ackerman	Newport	OR	97365	Protect whales and sea turtles in Oregon	2/2/2026
Lara	Martinez-Plachta	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/2/2026
Sandra	Schomberg	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/2/2026
Sean	Leslie	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/2/2026
Nikki	Breitbarth	Portland	OR	97223	Protect whales and sea turtles in Oregon	2/2/2026
Michael	Hoover	Beaverton	OR	97008	Protect whales and sea turtles in Oregon	2/2/2026
Andrea	Giolli	West Linn	OR	97068	Protect whales and sea turtles in Oregon	2/3/2026
Aviram	Sofir	Hillsboro	OR	97124	Protect whales and sea turtles in Oregon	2/4/2026
Jonah	F.	Portland	OR	97215	Protect whales and sea turtles in Oregon	2/2/2026
Stephen a	Johnson	Portland	OR	97225	Protect whales and sea turtles in Oregon	2/2/2026
Ned	Knight	Newberg	OR	97132	Protect whales and sea turtles in Oregon	2/2/2026
Sunny	Tabino	Summerville	OR	97876	Protect whales and sea turtles in Oregon	2/3/2026
robert	smith	Clackamas	OR	97015	Protect whales and sea turtles in Oregon	2/2/2026
Linda	Runyan	Salem	OR	97302	Protect whales and sea turtles in Oregon	2/3/2026
THOMAS	COONEY	Tualatin	OR	97062	Protect whales and sea turtles in Oregon	2/3/2026
Jana	Kincaid	Eugene	OR	97402	Protect whales and sea turtles in Oregon	2/4/2026
Michael	Renfrow	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/2/2026
Linda	Grove	Clackamas	OR	97015	Protect whales and sea turtles in Oregon	2/2/2026
Robert	Bresky	Oregon City	OR	97045	Protect whales and sea turtles in Oregon	2/3/2026
Linda	Knox	Bend	OR	97702	Protect whales and sea turtles in Oregon	2/3/2026
Danielle	Stutheit	Newport	OR	97365	Protect whales and sea turtles in Oregon	2/2/2026
Dianne	Miller	Imnaha	OR	97842	Protect whales and sea turtles in Oregon	2/3/2026
Joe	Frascone	Dallas	OR	97338	Protect whales and sea turtles in Oregon	2/2/2026
Karen	Hooper	Portland	OR	97216	Protect whales and sea turtles in Oregon	2/2/2026
Mary	Elias	Mcminnville	OR	97128	Protect whales and sea turtles in Oregon	2/2/2026
Randy	Smith	Portland	OR	97212	Protect whales and sea turtles in Oregon	2/2/2026

Scott	Kacek	Portland	OR	97216	Try leading the world for a change	2/2/2026
Adrian	Bergeron	Halfway	OR	97834	Protect whales and sea turtles in Oregon	2/2/2026
Phyllis	Jaskowiak	Marylhurst	OR	97036	Protect whales and sea turtles in Oregon	2/2/2026
Cherine	Bauer	Eugene	OR	97404	Protect whales and sea turtles in Oregon	2/2/2026
Firelin	Jones	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/2/2026
Alexander	Reeder	Prineville	OR	97754	Protect whales and sea turtles in Oregon	2/5/2026
Rebecca	Tilden	Aumsville	OR	97325	Protect whales and sea turtles in Oregon	2/2/2026
Helen	Jones	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/2/2026
Craig	Cline	Salem	OR	97302	Protect whales and sea turtles in Oregon	2/3/2026
denine	heinemann	Portland	OR	97217	Protect whales and sea turtles in Oregon	2/2/2026
Lise	Hull	Bandon	OR	97411	Protect whales and sea turtles in Oregon	2/2/2026
Janet	Voss	Portland	OR	97201	Protect whales and sea turtles in Oregon	2/3/2026
Linda	Bolduan	Lake Oswego	OR	97034	Protect whales and sea turtles in Oregon	2/2/2026
Jud	Schlacter	Eugene	OR	97440	Protect whales and sea turtles in Oregon	2/5/2026
Jeanie	Lemens	Pendleton	OR	97801	Protect whales and sea turtles in Oregon	2/2/2026
Ryan	Beam	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/2/2026
Steve	Sheehy	Klamath Falls	OR	97603	Protect whales and sea turtles in Oregon	2/2/2026
Michael	Calhoon	Oregon City	OR	97045	Please Protect whales and sea turtles in Oregon	2/2/2026
Nancy	Carl	Mcminnville	OR	97128	Protect whales and sea turtles in Oregon	2/3/2026
Mary	Buckley	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/2/2026
Laurel	Temple	Portland	OR	97225	Protect whales and sea turtles in Oregon	2/2/2026
Evelyn	Pietrowski-Ciullo	Salem	OR	97301	Protect whales and sea turtles in Oregon	2/3/2026
Pam	Rensch	Saint Helens	OR	97051	Protect whales and sea turtles in Oregon	2/2/2026
Laura	McCaskill	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/3/2026
Nikki	Dennis	Portland	OR	97201	Protect whales and sea turtles in Oregon	2/4/2026
Joshua	Horner	Happy Valley	OR	97086	Protect whales and sea turtles in Oregon	2/2/2026
Kyle	Haines	Hood River	OR	97031	Protect whales and sea turtles in Oregon	2/2/2026
Carolyn	Blackman	Portland	OR	97216	Protect whales and sea turtles in Oregon	2/3/2026
Christopher	Cooper	Portland	OR	97214	Protect whales and sea turtles in Oregon	2/2/2026
Leigh	Starceвич	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/2/2026
Philip	Johnston	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/2/2026
Claudia	Hasenhuttl	Gold Beach	OR	97444	Protect whales and sea turtles in Oregon	2/2/2026
Leland	Peterman	Scio	OR	97374	Protect whales and sea turtles in Oregon	2/2/2026
Rebecca	Savage	Portland	OR	97206	Protect whales and sea turtles in Oregon	2/3/2026
Jan	Slavid	Beaverton	OR	97008	Protect whales and sea turtles in Oregon	2/4/2026
Mary Elizabeth	Braun	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/3/2026
Jessica	Stainbrook	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/3/2026
Dave	Ruud	Portland	OR	97231	Protect whales and sea turtles in Oregon	2/2/2026
Donna	Bonetti	North Bend	OR	97459	Protect whales and sea turtles in Oregon	2/2/2026
Douglas	Maccomb	Saint Helens	OR	97051	Protect whales and sea turtles in Oregon	2/3/2026
Suzanne	Fernstrom	Eugene	OR	97402	Protect whales and sea turtles in Oregon	2/2/2026
Damian	Latona	Astoria	OR	97103	Please, I urge you to protect whales and sea turtles in Oregon	2/4/2026
Shireen	Press	Portland	OR	97218	Protect whales and sea turtles in Oregon	2/2/2026
CHRIS	LATT	Portland	OR	97224	Protect whales and sea turtles in Oregon	2/3/2026
Dana	Bleckinger	Yachats	OR	97498	Protect whales and sea turtles in Oregon	2/2/2026
Theresa	Day	Portland	OR	97222	Protect whales and sea turtles in Oregon	2/3/2026
Karen	Lamson	The Dalles	OR	97058	Protect whales and sea turtles in Oregon	2/2/2026
Anne	Corbett	Gresham	OR	97080	Protect whales and sea turtles in Oregon	2/2/2026
Judith	Lienhard	Portland	OR	97225	Protect whales and sea turtles in Oregon	2/2/2026
Shane	Fritz	Stayton	OR	97383	Protect whales and sea turtles in Oregon	2/2/2026
Richard	Curtis	Gresham	OR	97080	Protect whales and sea turtles in Oregon	2/3/2026
Cheryl	lewis	Forest Grove	OR	97116	Protect whales and sea turtles in Oregon	2/6/2026
Linda	Medeiros	Medford	OR	97504	Protect whales and sea turtles in Oregon	2/2/2026

John	Barger	Portland	OR	97206	Protect whales and sea turtles in Oregon	2/2/2026
Robin	Katzenstein	Albany	OR	97322	Protect whales and sea turtles in Oregon	2/2/2026
Beth	Marshall	Central Point	OR	97502	Protect whales and sea turtles in Oregon	2/3/2026
margaret	covert	Portland	OR	97219	Protect whales and sea turtles in Oregon	2/2/2026
Gwen	Stone	Myrtle Creek	OR	97457	Protect whales and sea turtles in Oregon	2/3/2026
Joanne M	James	Portland	OR	97212	Protect whales and sea turtles in Oregon	2/3/2026
Shanti	Maffey	Eugene	OR	97403	Protect whales and sea turtles in Oregon	2/6/2026
Barbara	Methvin	Portland	OR	97225	Protect whales and sea turtles in Oregon	2/3/2026
Lucile	McKenzie	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/2/2026
Patricia	Pomeroy	Irrigon	OR	97844	Protect whales and sea turtles in Oregon	2/2/2026
Matt	Crawford	Los Angeles	CA	90046	Protect whales and sea turtles in Oregon	2/2/2026
Laura	Colby	Dexter	OR	97431	Protect whales and sea turtles in Oregon	2/3/2026
Karen	Sjogren	Salem	OR	97304	Protect whales and sea turtles in Oregon	2/3/2026
Jo	Jeffries	Malin	OR	97632	Protect whales and sea turtles in Oregon	2/2/2026
Judy	Knudson	Waldport	OR	97394	Protect whales and sea turtles in Oregon	2/2/2026
Michael	Ryan	Portland	OR	97205	Protect whales and sea turtles in Oregon	2/3/2026
Larry	narlock	Grants Pass	OR	97526	Protect whales and sea turtles in Oregon	2/2/2026
Mary Lee	Lassett-Egbert	Klamath Falls	OR	97601	Protect whales and sea turtles in Oregon	2/3/2026
C L	Thomas	Portland	OR	97209	Protect Whales and Sea Turtles in Oregon	2/2/2026
Heather	Dale	Wilsonville	OR	97070	Protect whales and sea turtles in Oregon	2/2/2026
Janice	VrMeer	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/2/2026
Sue	Leonetti	Veneta	OR	97487	Protect whales and sea turtles in Oregon	2/2/2026
Erin	McDonald	Portland	OR	97216	Protect whales and sea turtles in Oregon	2/2/2026
Rachel	Secrest	Beaverton	OR	97007	Protect whales and sea turtles in Oregon	2/3/2026
Glen	Comuntzis	Portland	OR	97223	Protect whales and sea turtles in Oregon	2/2/2026
Russell	Axelrod	West Linn	OR	97068	Protect whales and sea turtles in Oregon	2/2/2026
Thomas	Sanford	Portland	OR	97230	Protect whales and sea turtles in Oregon	2/2/2026
Mary	Thompson	Portland	OR	97219	Protect whales and sea turtles in Oregon	2/4/2026
Bonnie	Cross	Gresham	OR	97080	Protect whales and sea turtles in Oregon	2/2/2026
Veena	Singwi	Eugene	OR	97404	Protect whales and sea turtles in Oregon	2/2/2026
E	Sherry	Salem	OR	97304	Protect whales and sea turtles in Oregon	2/2/2026
Sarah	Finne	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/3/2026
Cameron	Backus	Newberg	OR	97132	Protect whales and sea turtles in Oregon	2/2/2026
Jill	Marks	Newport	OR	97365	Protect whales and sea turtles in Oregon	2/2/2026
PAMELA	YATES	Gresham	OR	97030	Protect whales and sea turtles in Oregon	2/2/2026
Sandra	Jilton Rogers	Medford	OR	97504	Protect whales and sea turtles in Oregon	2/3/2026
Lyle	Lyle	Portland	OR	97266	Protect whales and sea turtles in Oregon	2/2/2026
Molly	M	Happy Valley	OR	97086	Protect whales and sea turtles in Oregon	2/2/2026
Cynthia	Hicks	Portland	OR	97227	Protect whales and sea turtles in Oregon	2/2/2026
Debra	Smith	Portland	OR	97267	Protect whales and sea turtles in Oregon	2/3/2026
James	Hauge	Salem	OR	97302	Protect whales and sea turtles in Oregon	2/3/2026
Lois	Lederman	South Beach	OR	97366	Protect whales and sea turtles in Oregon	2/2/2026
Alexis	Petrohilos	Eugene	OR	97403	Protect whales and sea turtles in Oregon	2/3/2026
JoEllen	Mayer	Beaverton	OR	97005	Protect whales and sea turtles in Oregon	2/2/2026
John	Brinkley	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/2/2026
Katelyn	Acevedo Perez	Grants Pass	OR	97527	Protect whales and sea turtles in Oregon	2/3/2026
Alan	Lawrence	Portland	OR	97217	Protect whales and sea turtles in Oregon	2/2/2026
Shira	Fogel	Clackamas	OR	97015	Protect whales and sea turtles in Oregon	2/2/2026
Janet	Zancanella	Albany	OR	97322	Protect whales and sea turtles in Oregon	2/3/2026
Mariela	Wilkes	Mount Angel	OR	97362	Protect whales and sea turtles in Oregon	2/2/2026
Dale	Holzschuh	Portland	OR	97214	Protect whales and sea turtles in Oregon	2/3/2026
Hillary	Tiefer	Portland	OR	97219	Protect whales and sea turtles in Oregon	2/2/2026
Jamie	Shields	Rainier	OR	97048	Protect whales and sea turtles in Oregon	2/2/2026
Patricia Christine	White	Beaverton	OR	97007	Protect whales and sea turtles in Oregon	2/2/2026
Elizabeth	Sheppard	Portland	OR	97202	Protect whales and sea turtles in Oregon	2/2/2026

Sandra	Dixon	Portland	OR	97203	Protect whales and sea turtles in Oregon	2/2/2026
Kathryn	Fox	Salem	OR	97317	Protect whales and sea turtles in Oregon	2/3/2026
Julie	VandenBerg	Phoenix	OR	97535	Protect whales and sea turtles in Oregon	2/2/2026
Allison	Everitt	Salem	OR	97301	Protect whales and sea turtles in Oregon	2/3/2026
Diane	George	Hillsboro	OR	97124	Protect whales and sea turtles in Oregon	2/3/2026
Dana	Brenner	Florence	OR	97439	Protect whales and sea turtles in Oregon	2/3/2026
Abigail	Jiran	Hood River	OR	97031	Protect whales and sea turtles in Oregon	2/2/2026
Cierra	Buer	Powell Butte	OR	97753	Protect whales and sea turtles in Oregon	2/2/2026
James	Rankin	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/3/2026
Alexa	pengelly	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/3/2026
Annita	Bowman	Ontario	OR	97914	Protect whales and sea turtles in Oregon	2/2/2026
Dana	Petre-Miller	Salem	OR	97303	Protect whales and sea turtles in Oregon	2/2/2026
Diane	D	Sweet Home	OR	97386	Protect whales and sea turtles in Oregon	2/2/2026
Sue	Blair	Hillsboro	OR	97123	Protect whales and sea turtles in Oregon	2/3/2026
Linda	Skonberg	Sutherlin	OR	97479	Protect whales and sea turtles in Oregon	2/2/2026
Sherry	Haswarey	Portland	OR	97229	Protect whales and sea turtles in Oregon	2/2/2026
Barbara	Shor	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/3/2026
David	Kollen	Brookings	OR	97415	Protect whales and sea turtles in Oregon	2/2/2026
Rosemarie	Gerstner	Jacksonville	OR	97530	Protect whales and sea turtles in Oregon	2/2/2026
Satomi	Honda	Beaverton	OR	97008	Protect whales and sea turtles in Oregon	2/4/2026
Michael	Flaningam	Depoe Bay	OR	97341	Protect whales and sea turtles in Oregon	2/5/2026
Philip	kavan	Portland	OR	97214	Protect whales and sea turtles in Oregon	2/3/2026
Joel	Kay	Portland	OR	97222	Protect whales and sea turtles in Oregon	2/2/2026
Margot	Monti	Portland	OR	97223	Protect whales and sea turtles in Oregon	2/2/2026
Jenny	Spring	Portland	OR	97210	No more entangled whales-YES WE CAN	2/3/2026
Judy	Wilcox	Troutdale	OR	97060	Protect whales and sea turtles in Oregon	2/2/2026
Joan	Kalvelage	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/2/2026
Leone.	Lewis	Salem	OR	97303	Protect whales and sea turtles in Oregon	2/3/2026
Pamela	Collord	Portland	OR	97267	Protect whales and sea turtles in Oregon	2/2/2026
R	h	Gladstone	OR	97027	Protect whales and sea turtles in Oregon	2/2/2026
Jeanne	Eddy	Myrtle Creek	OR	97457	Protect whales and sea turtles in Oregon	2/2/2026
Samantha	Hathaway	Wilsonville	OR	97070	Protect whales and sea turtles in Oregon	2/3/2026
John	Dowd	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/3/2026
Sandy	Miller	Portland	OR	97215	Protect whales and sea turtles in Oregon	2/2/2026
Joan	Steelhammer	Bend	OR	97708	Protect whales and sea turtles in Oregon	2/2/2026
Ruth	Schellbach	Salem	OR	97302	Protect whales and sea turtles in Oregon	2/4/2026
Crystal	Conklin	Portland	OR	97266	Protect whales and sea turtles in Oregon	2/3/2026
Elizabeth	Victor	Grants Pass	OR	97527	Protect whales and sea turtles in Oregon	2/3/2026
Diane	hestich	Hillsboro	OR	97123	Protect whales and sea turtles in Oregon	2/3/2026
Jennifer	Loomis	Portland	OR	97266	Protect whales and sea turtles in Oregon	2/5/2026
Jamie	Blute	Hines	OR	97738	Protect whales and sea turtles in Oregon	2/5/2026
Monica	Kenney	Butte	MT	59701	Protect whales and sea turtles in Oregon	2/4/2026
Tanya	Gilula	Portland	OR	97222	Protect whales and sea turtles in Oregon	2/2/2026
Kim	Wick	Buxton	OR	97109	Protect whales and sea turtles in Oregon	2/3/2026
Jacqueline	Jenkins	Salem	OR	97303	Protect whales and sea turtles in Oregon	2/7/2026
Cindy	Enlow	Albany	OR	97321	Protect whales and sea turtles in Oregon	2/2/2026
Heidi	Hartman	Bend	OR	97701	Protect whales and sea turtles in Oregon	2/4/2026
Donna	Thelander	Portland	OR	97222	Protect whales and sea turtles in Oregon	2/2/2026
Heidi	Hart-Zorin	Portland	OR	97214	Protect whales and sea turtles in Oregon	2/2/2026
Kathy	Robinson	Gladstone	OR	97027	Protect whales and sea turtles in Oregon	2/3/2026
Douglas	BEALL	Camp Sherman	OR	97730	Protect whales and sea turtles in Oregon	2/3/2026
Rebecca	Parker	Bend	OR	97701	Protect whales and sea turtles in Oregon	2/3/2026
John	Bartels	Portland	OR	97266	Protect whales and sea turtles in Oregon	2/2/2026
Fern	Walker	Portland	OR	97230	Protect whales and sea turtles in Oregon	2/2/2026
Jennifer	Finley	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/2/2026

Wally	Sykes	Joseph	OR	97846	Protect whales and sea turtles in Oregon	2/2/2026
Paul	Borcherding	La Grande	OR	97850	Protect whales and sea turtles in Oregon	2/2/2026
Nancy	Lyles	Grants Pass	OR	97526	Protect whales and sea turtles in Oregon	2/2/2026
Ann	Hollyfield	Waldport	OR	97394	Protect whales and sea turtles in Oregon	2/2/2026
Becky	Rose	Beaverton	OR	97005	Protect whales and sea turtles in Oregon	2/2/2026
Anthony	Albert	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/2/2026
Lory	Utz	Roseburg	OR	97470	Protect whales and sea turtles in Oregon	2/2/2026
Stacy	Alaimo	Eugene	OR	97404	Protect whales and sea turtles in Oregon	2/3/2026
Ellen	Pfander	Creswell	OR	97426	Protect whales and sea turtles in Oregon	2/3/2026
Lisa	Adams	Salem	OR	97302	Protect whales and sea turtles in Oregon	2/3/2026
Karen	Wecker	Salem	OR	97306	Protect whales and sea turtles in Oregon	2/2/2026
Elizabeth	Darby	Portland	OR	97209	Protect whales and sea turtles in Oregon	2/2/2026
Julie	Longanecker	Gold Hill	OR	97525	Protect whales and sea turtles in Oregon	2/2/2026
Annie	Thorp	Salem	OR	97317	Protect whales and sea turtles in Oregon	2/3/2026
Amy	Hunter	Portland	OR	97212	Protect whales and sea turtles in Oregon	2/4/2026
Marc	Anderson	Tualatin	OR	97062	Protect whales and sea turtles in Oregon	2/10/2026
Linda	Hansen	Portland	OR	97218	Protect whales and sea turtles in Oregon	2/2/2026
Laura V	Schaap	Cottage Grove	OR	97424	Protect whales and sea turtles in Oregon	2/2/2026
Mick	Alderman	Astoria	OR	97103	Protect whales and sea turtles in Oregon	2/3/2026
Robin	Esterkin	Portland	OR	97219	Protect whales and sea turtles in Oregon	2/2/2026
Robb	Sturtzman	Portland	OR	97209	Protect whales and sea turtles in Oregon	2/4/2026
Audrey	Collins	Chiloquin	OR	97624	Protect whales and sea turtles in Oregon	2/3/2026
Susan	Langston	Portland	OR	97212	Protect whales and sea turtles in Oregon	2/2/2026
Angela	Fazzari	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/3/2026
Julie	Harris	Beaverton	OR	97078	Protect whales and sea turtles in Oregon	2/2/2026
LeAnn	Magee	Portland	OR	97223	Protect whales and sea turtles in Oregon	2/3/2026
Barbara	Council	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/2/2026
WYATT	GIBSON	Chiloquin	OR	97624	Protect whales and sea turtles in Oregon	2/3/2026
Andrew	Scott	Bend	OR	97709	Protect whales and sea turtles in Oregon	2/3/2026
Holly	Zapf	Portland	OR	97232	Protect whales and sea turtles in Oregon	2/3/2026
Helia	Rasti	Portland	OR	97219	Protect whales and sea turtles in Oregon	2/3/2026
Dreamy	Sea	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/2/2026
Steve	Prince	Eugene	OR	97405	Protect whales and sea turtles in Oregon	2/2/2026
Kristina	Abromaitis	Central Point	OR	97502	Protect whales and sea turtles in Oregon	2/2/2026
Laura	Hanks	Portland	OR	97222	Protect whales and sea turtles in Oregon	2/3/2026
Matthew	Higgins	Encinitas	CA	92024	Protect whales and sea turtles in Oregon	2/2/2026
D.	Deloff	Beaverton	OR	97078	Protect whales and sea turtles in Oregon	2/2/2026
Stuart	phillips	Port Townsend	WA	98368	Protect whales and sea turtles in Oregon	2/2/2026
Melanie	Birch	Corvallis	OR	97333	Protect whales and sea turtles in Oregon	2/2/2026
Geena	Levoe	Portland	OR	97229	Protect whales and sea turtles in Oregon	2/3/2026
Scott	Kennedy	Salem	OR	97303	Protect whales and sea turtles in Oregon	2/2/2026
Karon	Johnson	Bend	OR	97702	Protect whales and sea turtles in Oregon	2/2/2026
JAY	RICHARDS	Bend	OR	97701	Protect whales and sea turtles in Oregon	2/4/2026
Margo	Slaughter	Eugene	OR	97401	Protect whales and sea turtles in Oregon	2/3/2026
Christine	Poklemba	Portland	OR	97202	Protect whales and sea turtles in Oregon	2/2/2026
Bruce	Pellegrini	Canby	OR	97013	Protect whales and sea turtles in Oregon	2/2/2026
Patrick	Bak	Talent	OR	97540	Protect whales and sea turtles in Oregon	2/2/2026
Julia	barbee	Portland	OR	97216	Protect whales and sea turtles in Oregon	2/2/2026
Tom	Beatty	Eugene	OR	97408	Protect whales and sea turtles in Oregon	2/3/2026
Sharon	Herber	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/3/2026
Austin	Sumpter	Canby	OR	97013	Protect whales and sea turtles in Oregon	2/2/2026
BIANETTH	VALDEZ	Portland	OR	97205	Protect whales and sea turtles in Oregon	2/3/2026
Wendy	Little	Gladstone	OR	97027	Protect whales and sea turtles in Oregon	2/3/2026
Robin	Ricker	Mcminnville	OR	97128	Protect whales and sea turtles in Oregon	2/2/2026
Stephanie	Strakbein	Redmond	OR	97756	Protect whales and sea turtles in Oregon	2/3/2026
Arianrhod	Conrad-Antoville	Portland	OR	97206	Protect whales and sea turtles in Oregon	2/7/2026

Juanita	Garnow	Portland	OR	97223	Protect whales and sea turtles in Oregon	2/2/2026
Margo	Huntsman	Klamath Falls	OR	97603	Protect whales and sea turtles in Oregon	2/3/2026
Serena	Chakravorty	Happy Valley	OR	97086	Protect whales and sea turtles in Oregon	2/2/2026
Gina	Norman	Portland	OR	97213	Protect whales and sea turtles in Oregon	2/2/2026
Patricia	Browning	Ashland	OR	97520	Protect whales and sea turtles in Oregon	2/2/2026
Marguerite	Eliasson	South Beach	OR	97366	Protect whales and sea turtles in Oregon	2/2/2026
Dylan	Beck	Portland	OR	97227	Protect whales and sea turtles in Oregon	2/4/2026
Laura	Coleman Waite	Portland	OR	97211	Protect whales and sea turtles in Oregon	2/2/2026
Sean	Willis	Portland	OR	97217	Protect whales and sea turtles in Oregon	2/2/2026
Gayle	Cerri	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/2/2026
Valerie	Snyder	Forest Grove	OR	97116	Protect whales and sea turtles in Oregon	2/8/2026
David	Carnese	Portland	OR	97202	Protect whales and sea turtles in Oregon	2/4/2026
Kati	Wilson	Corvallis	OR	97333	Protect whales and sea turtles in Oregon	2/2/2026
Maureen	O'Neal	Portland	OR	97223	Protect whales and sea turtles in Oregon	2/2/2026
Joan	Davis	Portland	OR	97230	Protect whales and sea turtles in Oregon	2/3/2026
Teresa	Sem	Portland	OR	97229	Protect whales and sea turtles in Oregon	2/3/2026
Rolf	Friis	Happy Valley	OR	97086	Protect whales and sea turtles in Oregon	2/2/2026
Steve	Hocker	Lincoln City	OR	97367	Protect whales and sea turtles in Oregon	2/2/2026
Jan	Stone	Beaverton	OR	97007	Protect whales and sea turtles in Oregon	2/2/2026
Linda	Neely	Bend	OR	97702	Protect whales and sea turtles in Oregon	2/3/2026
Stefanie	Landman	Forest Grove	OR	97116	Protect whales and sea turtles in Oregon	2/2/2026
Tanya	Maxwell	Florence	OR	97439	Protect whales and sea turtles in Oregon	2/2/2026
Pamela	Vasquez	Salem	OR	97305	Protect whales and sea turtles in Oregon	2/3/2026
Caroline	Miller	Portland	OR	97232	Protect whales and sea turtles in Oregon	2/2/2026
Michael	Carter	Portland	OR	97206	Protect whales and sea turtles in Oregon	2/3/2026
Scott	Maclowry	Bend	OR	97703	Protect whales and sea turtles in Oregon	2/2/2026
Richard	Cummins	Waltersville	OR	97489	Protect whales and sea turtles in Oregon	2/2/2026
Gisela	Ryter	Bend	OR	97701	Protect whales and sea turtles in Oregon	2/2/2026
Eric	Ross	Sweet Home	OR	97386	Protect whales and sea turtles in Oregon	2/3/2026
John	hathaway	Redmond	OR	97756	Protect whales and sea turtles in Oregon	2/2/2026
Gena	Strom	Eagle Point	OR	97524	Protect whales and sea turtles in Oregon	2/2/2026
Sara	Grusing	Portland	OR	97266	Protect whales and sea turtles in Oregon	2/2/2026
Michael	Barton	West Linn	OR	97068	Protect whales and sea turtles in Oregon	2/2/2026
Thomas	Zumbroich	Salem	OR	97301	Protect whales and sea turtles in Oregon	2/4/2026
L Penny	Guinther	Lincoln City	OR	97367	Protect whales and sea turtles in Oregon	2/2/2026
Rebecca	Kimsey	Sublimity	OR	97385	Protect whales and sea turtles in Oregon	2/2/2026
Karen	Deora	Portland	OR	97212	Protect whales and sea turtles in Oregon	2/2/2026
Wendy	Larson	Portland	OR	97219	Protect whales and sea turtles in Oregon	2/2/2026
Tosh	myers	Deer Island	OR	97054	Protect whales and sea turtles in Oregon	2/2/2026
Dana	robinson	Portland	OR	97206	Protect whales and sea turtles in Oregon	2/3/2026
Juanita	Rinas	Eugene	OR	97402	Protect whales and sea turtles in Oregon	2/2/2026
Judy	Tannehill	Salem	OR	97304	Protect whales and sea turtles in Oregon	2/3/2026
Inge	King	Corvallis	OR	97330	Protect whales and sea turtles in Oregon	2/2/2026

First Name	Last Name	City	State/ Provinc e	Zip/ Postal	Subject	Comment	Date Submitted
james	thompson	Portland	OR	97210	Act Now to Protect Marine Wildlife in Oregon	<p>I am writing to urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>	2/3/2026

Paul	Howard	Corvallis	OR	97333	Protect whales and sea turtles in Oregon	<p>Twice, my Wife and I have encountered dead young baleen whale sub-adolescents on the beach near the Taylor Dunes and Tahkenitch Creek area. Both times they had crab-pots with ropes encircling them with the ropes having cut deeply into the flesh of their tails (not the flukes) cutting through most of the muscle anteriorly/ventrally and to the spine posteriorly/dorsally. Both dead whales looked thin and likely had been unable to feed, and unable to swim due to the loss of muscle function and severe pain as the ropes had cut through the tail muscles. We are only periodic visitors to the coast when we go backpacking in the above-mentioned areas. We live in Corvallis. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>	2/2/2026
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Gerard	Ridella	Portland	OR	97215	Protect whales and sea turtles in Oregon	<p>Man takes from our oceans &amp; lands. But profit doesn't look at the impact they cause. We are now at a point where harvesting is causing damage that Nature cannot recover from! Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>
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This is very concerning to me and our state must take action to intervene in this dangerous situation. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Babs	Alvernaz	Junction City	OR	97448	Whales and Sea Turtles Need Protection Now!	<p>I am writing as an Oregonian and wildlife lover. I am appalled that commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These magnificent animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I am asking the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Many species of marine mammals are imperiled; the entanglements lead to animals like North Pacific right whales and leatherback sea turtles dying unnecessarily. Oregon must force fisheries through legislation to use pop-up fishing gear. This has been proven to save marine mammals. For the above reasons I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rule making proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. Oregon can protect whales, sea turtles, and other marine life from injury or death and save these beautiful creatures for future generations.</p>	2/3/2026
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Rhett Lawrence Portland OR 97217 Please protect whales and sea turtles 2/2/2026

I am a Portland resident, but a frequent visitor to the Oregon coast. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Peter                      Brewer                      Bend                      OR                      97703                      Please help protect whales and sea turtles in Oregon                      2/3/2026

We all know that commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. Help take some measures or steps to resolve this now. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I am certainly glad that I do not encounter this fishing gear in my activities. This may be difficult to imagine for you, but if you were a whale or a turtle, how could you make sure 100% of the time you were never in danger of dying from entanglement in such nets? I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Please take action on this. Thank you. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Protect whales and sea turtles in Oregon

97206

OR

Portland

Fletcher

Karen

As a lover of marine life and a person who loves to eat crab as well as crab recreationally it seems that we have excellent and tested solutions to the current issues with commercial fishing gear that has been entangling and injuring and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. This article from National Fishermen highlights the win win nature of pop up crabbing gear.

<https://www.nationalfisherman.com/california-fishery-trials-whale-safe-crab-gear-with-big-results> I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Protect whales and sea turtles in Oregon

97540

OR

Talent

Doleman

Lydia

Beth Flake Hood River OR 97031 Please protect whales and sea turtles in Oregon 2/2/2026

Oregon can do better. Please allow pop up fishing gear for crabs. The current commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Barbara

North  
Bend

OR

97459

Protect  
whales and  
sea turtles in  
Oregon

Every Monday morning, I volunteer several hours at the Charleston Marine Life Center in Coos County. I've spent 73 years living on the Oregon coast and I care deeply about the health of our ocean. I want our commercial fishing community to be successful without inflicting unnecessary harm on marine life, especially endangered whales. Whale watching and recreational fishing are important draws for tourism on our coast. Please take steps to protect marine life. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

2/4/2026

Michael	Wherley	Eugene	OR	97402	Protect whales and sea turtles in Oregon	I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. The commission should support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.	2/2/2026
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Martha	Stevens	Wallowa	OR	97885	Protect whales and sea turtles in Oregon	<p><b>TAX THE RICH THEIR FAIR SHARE AND HOLD THEM ACCOUNTABLE!!</b></p> <p>Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>	2/2/2026
Juliette	Dunn	Portland	OR	97201	Regulate the fishing industry to save whales and sea turtles	<p>Oregon's beautiful marine animals have been dying horrific deaths caused by the commercial fishing gear. They are entangled in netting and traps and end up drowning. Our iconic sea life should not have to suffer for the interests of corporations. The Oregon Fish and Wildlife Commission must take action to regulate the fishing industry, namely limiting the amount of fishing gear allowed in the water, particularly during peak whale season. The fishing industry cannot be allowed to run rampant polluting our water and indiscriminately killing marine life. Marine ecosystems are more vulnerable than ever.</p>	2/2/2026

As an Oregonian I am quite distressed that our beautiful state has not done a much better job of protecting whales and other marine life from getting entangled in fishing/crabbing gear. This must change. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Linore Blackstone Portland OR 97213 Protect whales and sea turtles in Oregon

Are you, Dear Commissioners, practicing target management? Aren't you supposed to protect our great wild beings? Seems not. Where is your integrity? Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Lana	Graff	Port Orford	OR	97465	Protect whales and sea turtles in Oregon	<p>As a 4th generation Oregon now living in Port Orford, I am aware that commercial fishing vessels use techniques that entangle marine life. This is not OK with me. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements threaten lives and species. This is not OK with me. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. Oregon must do everything in its power to regulate in a manner that minimizes fishing's negative impacts on marine life, and to encourage equipment and practices that support all of life as well as the fishing industry.</p>	2/3/2026
Roberta	Badger-Cain	Portland	OR	97206	Protect whales and sea turtles in Oregon	<p>As we all know, commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. The Oregon Fish and Wildlife Commission must take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. Please grant IMMEDIATELY the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the</p>	2/2/2026

water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death. Thank you.

I have recently found out that commercial fishing gear has been injuring and killing our whales and other marine animals. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Please protect whales in Oregon

Heather	Moriyah	Halsey	OR	97348	Protect whales and sea turtles in Oregon	<p>The photos of the humpback that washed ashore in San Marine made me physically ill. It is unthinkable that we continue to allow this to happen to our precious marine life. I love seafood as much as the next person, but NOT at the expense of these magnificent creatures. I'm sure you agree: commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. **I strongly urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters.**</p> <p>Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission **must** support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. WHY?! Oregonians are better than this! Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear! I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to - limit the amount of fishing gear in the water during periods of peak whale concentrations, - implement management actions to swiftly respond to confirmed entanglements, and - advance common-sense solutions like pop-up fishing gear. By doing so, we can protect whales, sea turtles, and other marine life from injury or death. Thank you very much for your time and attention to this critical issue.</p>
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Rose	Estes	Waldport	OR	97394	Protect whales and sea turtles in Oregon	<p>2/2/2026</p> <p>Recently, a young whale was entangled in fishing gear and washed up on the beach in Yachats, Oregon. Despite best efforts from many different groups, the whale was unable to be returned to the ocean and was tragically, euthanized to prevent further suffering. It was terrible to observe by all those who had hoped for a better outcome. This is but one example of Commercial fishing gear entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>
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Elissa	Rashkin	Salem	OR	97301	Protect whales and sea turtles in Oregon	<p>I have been reading about how commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>	2/2/2026
Sue	Kelso-Haines	Hood River	OR	97031	Protect whales and sea turtles in Oregon	<p>I am writing to urge Oregon to manage its Dungeness crab fishery to protect sea life from becoming entangled, injured and often killed. These populations are already so fragile without the occurrence of injuries and deaths that have become so common because of entanglements! Oregon should require 'pop-up' or ropeless fishing gear to eliminate the vertical lines that the whales (and other marine life) get caught in. Also, during peak migration and calving times, the amount of fishing gear allowed in the water should be limited. In addition, the response to entanglements should be swift. <b>UNLESS WE DO THESE THINGS, THERE IS A VERY REAL POSSIBILITY THAT WHALES AND OTHER MARINE LIFE SUCH AS SEALS AND SEA TURTLES AND SEA LIONS WILL FACE EXTINCTION.</b> What a sad reflection on humans! You might consider subsidies to help fishermen replace their dangerous and outdated gear too. Something must be done! I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council. Our sea life should be protected from entanglements!</p>	2/2/2026

Elizabeth Waldron	Corvallis	OR	97333	We need whales and sea turtles in Oregon	<p>Good intentions are not enough! We need to protect sea life from humans now. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>	2/3/2026
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Karen	Beyers	La Pine	OR	97739	Leatherback sea turtles in Oregon	<p>I am not a scientist, engineer or business person - these 3 professionals should be brought together to study commercial fishing gear which has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. With numbers, tech and redirection of priority funding now, prevention of entanglement (swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface) can be reduced - across everyone's economic requirements. When swimming creatures (using feeding, migration and breeding routes) get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. Incidents of unnecessarily causing harm to sealife - waste everyone's resources and time. Successful, sustained, profitable Fisheries can be run better than this. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. A lot of money that might be invested in moving fleets, doing mapping, planning seasons that are accurately predictable, and productive, - helping Fishers at their work - should not have to be used to police Fishers. Money spent to protect animals from immense suffering caused by Entanglements, will increasingly be used for their protection - not helping and ensuring fleets' profitability. The very existence of critically endangered North Pacific right whales and leatherback sea turtles has become a 'cause' for the public, and Fishers being forced to change up to required Fishing gear, is far more expensive, than now getting it into the business, early, and by choice. Being a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles - turns the buying public into a threat to industry - that fails to do - the right thing. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Why is regulatory language here in Oregon preventing the use and advancement of this gear? Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. The migration routes will keep bringing the same sealife along the coast. Only Fishers doing the responsible change up, can be the solution to loss of sealife by entanglement. There are no other dangers to sealife, (like the old lines). Effective tech and engineering are already available. I ask the commission to grant the petition submitted by the ***Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council*** and initiate rulemaking proceedings to limit the designs of fishing gear in the water during periods of peak whale concentrations; implement management actions to swiftly respond to confirmed entanglements, and (quickly for next season) - advance common-sense solutions like the pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death. The favored feeding, breeding, migration routes along our coast can't change. Fishers can.</p>
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I am an avid fisherman along the coast of Oregon, and have seen firsthand, the damage and deaths that can occur to marine animals from entanglements with Commercial fishing gear!! Awareness is growing locally and globally online. Although we are becoming more aware of marine animal entanglements with Commercial fishing gear, it is only a minor percentage of what actually occurs in the oceans. Many marine animals likely die without being discovered. Even if entangled animals don't immediately drown from entanglement, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I am urging the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Please be beacon of hope for marine life and set an example for other states to be protective as well. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Rozlyn	Reynolds	South Beach	OR	97366	Protect whales and sea turtles in Oregon	<p>Living on the coast of Oregon, I was not aware that commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. Because of learning this, I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>
2/3/2026						

Act to protect whales!!! Now!! Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

David	Edwards	Eugene	OR	97404	Protect whales and sea turtles in Oregon	<p>This expresses my feelings exactly! Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>	2/2/2026
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Dianne Ensign Portland OR 97219 Please protect whales and sea turtles in Oregon 2/4/2026

I care deeply about protecting the ocean and marine life. The ocean supplies the food we eat, the air we breathe, and the water we drink, and it's at risk. Marine life suffers from myriad threats, including commercial fishing gear that has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

David and Berg  
Judith

Eugene

OR

97405

Protect  
whales and  
sea turtles in  
Oregon

The greatest good is served only by preserving and protecting biodiverse natural systems on which all life depends, habitats that comprise them, and wildlife that inhabit them. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. We urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

2/3/2026

Jennifer Davis	Portland	OR	97202	Protect whales and sea turtles in Oregon	<p>Please take a moment to read this true moving account of a daring rescue of a humpback whale which was trapped by ropes and crab pots and slowly drowning. This was published in SF Gate news and then later featured on Radio Lab: <a href="https://radiolab.org/podcast/animal-minds-211125/transcript">https://radiolab.org/podcast/animal-minds-211125/transcript</a> 'It was a very risky maneuver, Stoudt said, because the mere flip of a humpback's massive tail can kill a man. 'I was the first diver in the water, and my heart sank when I saw all the lines wrapped around it,' said Moskito, a 40-year-old Pleasanton resident who works with 'Great White Adventures,' a cage-diving outfit that contracts with Menigoz. 'I really didn't think we were going to be able to save it.' Moskito said about 20 crab-pot ropes, which are 240 feet long with weights every 60 feet, were wrapped around the animal. Rope was wrapped at least four times around the tail, the back and the left front flipper, and there was a line in the whale's mouth. The crab pot lines were cinched so tight, Moskito said, that the rope was digging into the animal's blubber and leaving visible cuts. At least 12 crab traps, weighing 90 pounds each, hung off the whale, the divers said. The combined weight was pulling the whale downward, forcing it to struggle mightily to keep its blow-hole out of the water. Moskito and three other divers spent about an hour cutting the ropes with a special curved knife. The whale floated passively in the water the whole time, he said, giving off a strange kind of vibration. 'When I was cutting the line going through the mouth, its eye was there winking at me, watching me,' Moskito said. 'It was an epic moment of my life.' When the whale realized it was free, it began swimming around in circles, according to the rescuers. Moskito said it swam to each diver, nuzzled him and then swam to the next one. --- Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. I ask the commission to grant the petition submitted by the</p>
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Kyle	Gullickson	Portland	OR	97209	Please! Protect our beloved marine life!	<p>The Fish and Wildlife Commission NEEDS to please step up their game and *actually* care for fish &amp; wildlife instead of caring about financial interests and consequently destroying what wildlife and wild land we have left. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for FAR TOO LONG. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. Imagine the sort of agony these dangerous tools leave in their wake. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. It is ethically non-negotiable. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. If you believe you have a conscience, you must grant the petition. By doing so, Oregon can protect whales, sea turtles, and other marine life from angonizing injury or death.</p>
2/2/2026						

Erika	Little	Portland	OR	97220	Protect whales and sea turtles in Oregon	<p>I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>	2/2/2026
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I love Dungeness crab, but it's not worth endangering the lives of marine mammals. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Protect whales and sea turtles in Oregon

97381

OR

Silverton

Bain

Karen

Michele Penner

Bend

OR

97701

Protect whales and sea turtles in Oregon

Please protect our sea dwelling wildlife. Our own lives depend on them. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

2/2/2026

Lynn Denenberg San Diego CA 92103 Protect whales and sea turtles in Oregon 2/3/2026

This is unacceptable. I am URGING IMMEDIATE ACTION on this for those who cannot speak on behalf of those without a voice. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for WAY TOO LONG. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

City

Null

Chiloquin OR

97624

Protect whales and sea turtles in Oregon

2/2/2026

The Creation does not get the respect it deserves. It's time to acknowledge its sacred significance instead of dismissing it as "the environment". Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

I am a lifelong Oregonian, and I have very fond memories growing up and crabbing in the coastal waters of Oregon. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal’s head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don’t immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon’s fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon’s precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.



I'm an Oregon resident and a lover of marine wildlife. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.

Scott	Penzarella	Sisters	OR	97759	Protect whales and sea turtles in Oregon	<p>Hello I live on the Oregon coast and I see washed up rope daily. I also see commercial crab fishing ships way too close to the project marine habitat area. It's time to stop reckless commercial fishing on the Oregon Coast. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>	2/2/2026
Veronica	Hinkes	Carlton	OR	97111	Protect whales and sea turtles in Oregon	<p>I am an Oregonian and do love dungeness crab, but not at the expense of whales and turtles. Commercial fishing gear has been entangling, injuring, and killing endangered whales, sea turtles, and other marine animals for far too long. These animals often become entangled by swimming into the rope, or vertical line, that runs from a trap set on the seafloor through the water column to a buoy at or near the surface. When they get entangled, heavy fishing rope — often still connected to even heavier traps — can wrap around the animal's head, mouth, flippers, or tail, sometimes preventing the animal from resurfacing, resulting in drowning. Or, if entangled animals don't immediately drown, the remaining entangling line often impedes their basic movement, feeding, and reproduction and causes chronic infection and damage to bone and muscle. I urge the Oregon Fish and Wildlife Commission to take immediate action to protect magnificent sea life in state waters. Entanglements not only cause animals immense suffering — they also threaten the very existence of numerous imperiled species, including critically endangered North Pacific right whales and leatherback sea turtles. Fishing gear is also a primary threat to blue whales, humpback whales, sperm whales, and other sea turtles. The four confirmed entanglements from fishing gear from Oregon's fishery in 2025 are unacceptable. The commission must support regulations that adequately and effectively protect Oregon's precious marine wildlife from serious injury and death. Pop-up fishing gear continues to demonstrate its promise as a solution to fishing-gear entanglements. Gear tests and trials conducted on both the West Coast and East Coast have proven the efficacy and reliability of pop-up fishing gear. Still, regulatory language here in Oregon is preventing the use and advancement of this gear. Oregon will never realize a future of whale-safe fishing without taking serious action to support the adoption of this gear. I ask the commission to grant the petition submitted by the Center for Biological Diversity, American Cetacean Society, Oceana, and Natural Resources Defense Council and initiate rulemaking proceedings to limit the amount of fishing gear in the water during periods of peak whale concentrations, implement management actions to swiftly respond to confirmed entanglements, and advance common-sense solutions like pop-up fishing gear. By doing so, Oregon can protect whales, sea turtles, and other marine life from injury or death.</p>	2/3/2026

## EXHIBIT C

### SUPPLEMENTAL PUBLIC CORRESPONDENCE

Received February 11, 2026, to February 17, 2026

**Subject: Support for Petition to Protect Whales from  
Entanglement in Oregon Fishing Gear**

122 individuals submitted the attached letter  
*(Letter & List Attached)*

## TATE Michelle L \* ODFW

---

**From:** Hollie Arklander <hollie.arklander@gmail.com>  
**Sent:** Tuesday, February 10, 2026 8:34 AM  
**To:** ODFW Commission \* ODFW  
**Subject:** Support for petition to protect whales from entanglement in Oregon fishing gear

You don't often get email from hollie.arklander@gmail.com. [Learn why this is important](#)

Dear Chair Wahl and Commission members,

I strongly support preventing whales from becoming entangled in fishing gear off the Oregon coast. I urge you to create a pathway for a more sustainable Dungeness crab fishery that does not pose a risk to wildlife.

The tragic death of a humpback whale that beached on the Oregon coast entangled in Oregon Dungeness crab gear—one of four such entanglements last year alone—should be a wake-up call that current management measures are not working. Whales are central to Oregon's coastal economy and ocean ecosystems, and the growing number of entanglements off our coast further jeopardizes them.

The petition under consideration contains reasonable solutions that are already working in California and should be applied here in Oregon. This includes stronger management measures that reduce the number of lines in the water during whale feeding and migration seasons, plus closing areas to conventional crab gear during the times when whales are known to be here in concentration. Doing so, while creating a pathway for fishers to use pop-up fishing gear that can avoid such entanglements, will protect whales and allow fishers to stay on the water and safely catch Dungeness crab. Consumers will also benefit knowing their Oregon crab was caught without harming wildlife.

I urge you to move forward with the whale entanglement petition. I request that you develop stronger management measures for the Oregon Dungeness crab fishery to protect whales while they feed and migrate off our coast and establish a pathway for pop-up gear that can keep fishers on the water while avoiding entangling whales.

Thank you,  
Hollie Arklander

     <b>From</b>	<b>Subject</b>	<b>Received</b>	<b>S...</b>
<b>Today</b>			
Margie Pratchenko	Support for petition to protect whales from e...	Tue 2/17/2026 8:58 AM	8...
You don't often get email from yinyangkitty1@gmail.com. Learn why this is important			
Teresa Long	Support for petition to protect whales from e...	Tue 2/17/2026 8:58 AM	6...
[You don't often get email from breesapdx@gmail.com. Learn why this is important at			
Elaine Winn	Support for petition to protect whales from e...	Tue 2/17/2026 8:58 AM	6...
[You don't often get email from ewinn@pps.net. Learn why this is important at <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> ]			
Stephen Walker	Support for petition to protect whales from e...	Tue 2/17/2026 8:57 AM	7...
You don't often get email from swalker8653@gmail.com. Learn why this is important			
Jenny Chism	Support for petition to protect whales from e...	Tue 2/17/2026 8:57 AM	6...
[You don't often get email from jcchism1955@gmail.com. Learn why this is important at			
<b>Last Week</b>			
Penney Reed	Support for petition to protect whales from e...	Fri 2/13/2026 2:43 PM	8...
You don't often get email from hateu3241@gmail.com. Learn why this is important			
Laura Hanks	Support for petition to protect whales from e...	Fri 2/13/2026 2:43 PM	7...
You don't often get email from laura.hanks7@gmail.com. Learn why this is important			
Terry Partipilo	Support for petition to protect whales from e...	Fri 2/13/2026 2:43 PM	7...
You don't often get email from srptlp@gmail.com. Learn why this is important < <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> >			
Allison Everitt	Support for petition to protect whales from e...	Thu 2/12/2026 8:15 AM	7...
You don't often get email from allisoneveritt18@gmail.com. Learn why this is important			
Wendy Pappadis	Support for petition to protect whales from e...	Thu 2/12/2026 8:15 AM	7...
You don't often get email from torioku001@gmail.com. Learn why this is important			
Sunny Tabino	Support for petition to protect whales from e...	Thu 2/12/2026 8:15 AM	7...
You don't often get email from zcan0623@gmail.com. Learn why this is important			
Robert Hammond	Support for petition to protect whales from e...	Thu 2/12/2026 8:15 AM	7...
You don't often get email from metoliusbob@gmail.com. Learn why this is important			
Nancy Perkinson	Support for petition to protect whales from e...	Thu 2/12/2026 8:15 AM	6...
[You don't often get email from nancyperkinson@gmail.com. Learn why this is important at			
Jeanne Prince	Support for petition to protect whales from e...	Thu 2/12/2026 8:15 AM	7...
You don't often get email from jeanneprince40@gmail.com. Learn why this is important			
Pamela Rosenthal	Support for petition to protect whales from e...	Thu 2/12/2026 8:15 AM	6...
[You don't often get email from pamelalrosenthal@gmail.com. Learn why this is important at			
Steve Sheehy	Support for petition to protect whales from e...	Wed 2/11/2026 10:20 AM	7...
You don't often get email from steve.sheehy@icloud.com. Learn why this is important			
Josh Laughtland	Support for petition to protect whales from e...	Wed 2/11/2026 10:20 AM	7...
You don't often get email from hotsprings.josh@gmail.com. Learn why this is important			
S Cook	Support for petition to protect whales from e...	Wed 2/11/2026 10:20 AM	7...
You don't often get email from swfcook@aol.com. Learn why this is important < <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> >			
Debra Hackett	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	7...
You don't often get email from debradaisy@gmail.com. Learn why this is important			
Michelle Casey	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	7...
You don't often get email from michellecasey02@gmail.com. Learn why this is important			
Barbara Methvin	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	7...
You don't often get email from skyhighbarbara@yahoo.com. Learn why this is important			
Carol Donohoe	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	7...
You don't often get email from crdonohoe1@gmail.com. Learn why this is important			
Matt Boucard	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	7...
You don't often get email from matt.boucard@gmail.com. Learn why this is important			
Robin Katzenstein	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	7...
You don't often get email from robinkatz54@gmail.com. Learn why this is important			
Kathryn Evers	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	7...
You don't often get email from allismemoir@aol.com. Learn why this is important			
Kaleigh Lucas	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	8...
You don't often get email from kaleighbliss@gmail.com. Learn why this is important			

     <b>From</b>	<b>Subject</b>	<b>Received</b>	<b>S...</b>
Jeanne Brooks [You don't often get email from ms.jeanbrooks@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	6...
Helen Jones You don't often get email from shej@mind.net. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	7...
John Fink You don't often get email from linda@fink.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	8...
Annita Bowman [You don't often get email from annitabowman@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:19 AM	6...
Eileene Gillson You don't often get email from egillson3@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	8...
Jonah Freeman You don't often get email from jtbeaglebird9@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	7...
Hillary Tiefer You don't often get email from hillarytiefer@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	8...
Matthew Gray You don't often get email from tomattsiphone@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	8...
Leland DeGolier [You don't often get email from degolierleland@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	6...
Judy Tannehill You don't often get email from judytannehill@icloud.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	8...
Jim Gear [You don't often get email from jimgear@charter.net. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	6...
Benjamin Welch [You don't often get email from benjaminwelch@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	6...
Rhoberta Michaels [You don't often get email from mabuda18@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	6...
Czora Pagsolingan You don't often get email from czpaige5@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	8...
Joanne Lee [You don't often get email from mashea47@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	6...
Lorraine Foster You don't often get email from lorraine.rae.foster@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	8...
Louise Bogart You don't often get email from bogyhi@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	8...
Sunja G You don't often get email from sunja@earthling.net. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	7...
Sue Harank You don't often get email from sue.harank@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	8...
Stephen A Johnson You don't often get email from seasaj777@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:18 AM	7...
Cristy Murray Dear Chair Wahl and Commission members,	Support for petition to protect whales from e... I strongly support preventing whales from becoming entangled in fishing gear off the	Wed 2/11/2026 10:17 AM	6...
Marissa Wolfheart You don't often get email from marissawolfheart@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	8...
Jessica Allen You don't often get email from jessicaagentile@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	8...
David Tvedt You don't often get email from david@dtvedt.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	7...
Jeffrey Jones You don't often get email from jeffrey.brosig@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	7...
Beth Levin You don't often get email from levin.beth@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	7...
Irene Brady You don't often get email from irene@natureworkspress.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	8...

     <b>From</b>	<b>Subject</b>	<b>Received</b>	<b>S...</b>
Estelle Voeller You don't often get email from evoeller@charter.net. Learn why this is important < <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> >	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	7...
Veroune Chittim [You don't often get email from verounechittim2@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	6...
Nancy Marshall You don't often get email from nancym97213@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	8...
Tamara Wecker You don't often get email from teekay177@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	8...
Carla Cudmore You don't often get email from cjcudmore@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	8...
P Horter You don't often get email from lacengh@gmail.com. Learn why this is important < <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> >	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	8...
Maureen O'Neal Dear Chair Wahl and Commission members,	I strongly support preventing whales from becoming entangled in fishing gear off the	Wed 2/11/2026 10:17 AM	6...
Osalyn Houser You don't often get email from osalynh@gmail.com. Learn why this is important < <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> >	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	7...
Heidi Andrade [You don't often get email from heidiajandrade@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	6...
Gloria Junkermann [You don't often get email from glopita49@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	6...
Barbara Wright You don't often get email from bw291@me.com. Learn why this is important < <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> >	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	7...
Beth Herron [You don't often get email from bethherron.8@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	6...
Jerry Charlson You don't often get email from jcbats@ccgmail.net. Learn why this is important < <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> >	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	7...
Megan Withey You don't often get email from illordess@gmail.com. Learn why this is important < <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> >	Support for petition to protect whales from e...	Wed 2/11/2026 10:17 AM	8...
Joseph Gaby You don't often get email from jpgaby53@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	7...
Karen Hooper You don't often get email from whitewolfpip.2010@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	7...
G Whiting You don't often get email from gwhiting@frontier.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	7...
Alice Elshoff [You don't often get email from calice58@gmail.com. Learn why this is important at <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a>	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	6...
Nancy Carl You don't often get email from dlnlcarl2@gmail.com. Learn why this is important < <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> >	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	7...
Michael Forster You don't often get email from mhawkesforster@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	8...
J St Pierre You don't often get email from jeannestpierre@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	8...
Jason Wilson You don't often get email from jwagamese@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	8...
Peg Reagan You don't often get email from reagan.peg@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	7...
Maille Daley You don't often get email from maille.daley@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	8...
Leslie Burpo You don't often get email from leslieburpo1@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	7...
Mark Singleton [You don't often get email from singlemsinglem@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	6...
Cary Isley [You don't often get email from ctisley9@gmail.com. Learn why this is important at <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> ]	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	6...

    <b>From</b>	<b>Subject</b>	<b>Received</b>	<b>S...</b>
Mary Moss-Sprague You don't often get email from mossysprague@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	8...
Michael Prinslow [You don't often get email from ekimwolsnirp@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	6...
Sage Avilon [You don't often get email from lholman3@my.chemeketa.edu. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	6...
Lisa Read You don't often get email from lisaread9@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	7...
Elizabeth Darby [You don't often get email from elizabethdarby137@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	6...
Michael Seefeldt You don't often get email from steelheader@charter.net. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	7...
Robert Bresky You don't often get email from bobthenatureguy@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	8...
Karen Mahoney [You don't often get email from kmahoney1072@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	6...
Mary South [You don't often get email from mbsouth6@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	6...
Brenda Kadi You don't often get email from fannygaslight@msn.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:16 AM	8...
Mary Anne Morrison [You don't often get email from 04.wisps_honesty@icloud.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	6...
Kenneth Ruff [You don't often get email from knbtoo43@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	6...
JULIE LANE You don't often get email from lanej@wlwv.k12.or.us. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	7...
Elizabeth Waldron [You don't often get email from ewaldron94@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	6...
Rita Kiley [You don't often get email from tkiley5@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	6...
Jan Stone You don't often get email from shorttailcat28@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	7...
Juanita Rinas You don't often get email from fainter_views2t@icloud.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	8...
Sharon Rogers You don't often get email from singingsharon@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	8...
Cynthia Hicks [You don't often get email from cindy.hicks519@gmail.com. Learn why this is important at	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	6...
LD B [You don't often get email from gldnfan@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	6...
Harris Linda You don't often get email from linda.m.harris@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	8...
Annie Winn You don't often get email from atracywinn@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	8...
Marsha Sleeth You don't often get email from sleethdesign@icloud.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	7...
Lee Zucker You don't often get email from mleemzucker@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	8...
David Haun You don't often get email from dbhaun@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	7...
Aurelia Phillips You don't often get email from lunging-hearts1n@icloud.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	8...
Delores Porch You don't often get email from verandafay@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	7...

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Kristin Vournas You don't often get email from kristinvournas@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	8...
Erika Kane You don't often get email from erikabkane@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	7...
John Plummer You don't often get email from johnjplummer@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	8...
Luanne Alomair You don't often get email from chowlover@me.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	7...
 Crystal Roy You don't often get email from xtalr52@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	7...
Nora Smith You don't often get email from nora.j.smith1@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	8...
Donna Mulvey You don't often get email from downlowmulvey@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:15 AM	7...
Andrew Leyva You don't often get email from andrew.leyva@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:14 AM	8...
Patricia Cleveland You don't often get email from pkcleve@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>	Support for petition to protect whales from e...	Wed 2/11/2026 10:14 AM	8...
Victor Quiroz You don't often get email from victorquirozster@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:14 AM	8...
Amy Roberts You don't often get email from homerjim82@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:14 AM	8...
Julie Asparro You don't often get email from julie.asparro@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:14 AM	8...
Rachel Cairns You don't often get email from rachel.cairns@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:14 AM	7...
Austin Sumpter You don't often get email from austinsptd1996@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:14 AM	8...
Hollie Arklander You don't often get email from hollie.arklander@gmail.com. Learn why this is important	Support for petition to protect whales from e...	Wed 2/11/2026 10:14 AM	8...

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/13/26 17:16:36	Mike and Annett hill	Adventurecharterfishing@yahoo.com	Fishing Charter	This will effect small business charter owners raising prices to the consumer for all consumers
2/13/26 20:38:16	Jesica Hockema	Jessi.hockema@gmail.com	4th generation crab fisherman	I grew up in a commercial fishing family. I grew up helping my great grandpa build crab pots. My dad ran The Brandy for decades, a boat that my grandfather built in the yard. I worked along side him on that boat many many years. It made me who I am. The science and research behind this is bogus. Whale numbers are growing. If they over populate they will starve themselves. This gear is tested in a bay in California. Very different from the open ocean off of the coast of Oregon. The coast of this replacement will wipe out most fisheries. There is grant money or meeting the fisheries in the middle. Who is going to supply your seafood?
2/13/26 20:43:20	David Quashnick	Davidquashnick@icloud.com	Commercial Crab fisherman	I'd like to say I think we have been doing exceptionally well in our industry considering the increased amount of whales and other mammals that are in the ocean!! I also think instead of disrupting a great fishery why can't we have a take permit for these animals you guys propose to protect from us. I fish on a very depressed Columbia river gillnet fishery and NOAA gives us take permits for that fishery! I think that there is a way better solution to this so called problem then destroying the Dungeness crab fishery!!!
2/13/26 20:41:27	John marrington	Agentanti@yahoo.com	I ask all of the so called state government that wants to destroy our livelihood and fishery	I've been a commercial fishermen most of my life .this agenda to destroy and make alot of fishermen lose there job and boats, permits. This crab industry has been very self sufficient for years. Just by the fishermen and the respect for the fishery. To ODFW . the adasity to try and get all boats off the ocean is unbelievable and unacceptable. This agenda that your trying to shove up our asses. is a real eye opener for the whole west coast fisheries,fleet with all the rules and regulations in place this new agenda should never even be presented. Killing the community's that depends on the money flow. And fresh seafood.....so my question is Why are always trying to destroy and make up rules for a fishery that does not need it ? Thank you john marrington
2/13/26 21:11:44	David c Hanson	Brezee.c12@gmail.com	Captain and part owner of crab boat Pacific Roamer	This petition will greatly affect my whole family and my crew and there family's. We are a mid sized boat that fishes the late season. We need this fishery to sustain our business or we will lose it without Salmon seasons and a collapse of the black cod market. We really hope you consider this in your decision and look very hard at the science while making your decision. The pop up gear is not viable for many of the smaller boats and mid sized boats that are barley hanging on as it is. This could be the nail in the coffin for many of us. Please consider this. Regards Chris Hanson f.v Pacific Roamer.
2/13/26 21:27:21	James pearce	James_pearce_87@live.com	Commercial crab boat owner	This is going to ruin my my career of over 20 years commercially harvesting crab! My family counts on crab to sustain our lives each and every year I'm against the new rules that is trying to be implemented into our industry.
2/13/26 21:41:52	William Manning	Billsinspiration@yahoo.com	Commercial Crab fisherman	As a twenty plus year commercial fisherman, I would like petition to be rejected. We have successfully managed our fishiery through the three S's ( size, sex and season). The humpback whale population been on an 8% growth rate for approximately 10 years. Special interest groups should not dictate how we manage the fishiery.  Thank you, William Manning
2/13/26 21:44:15	Travis davis	Superdupertravisdavis@yahoo.com	Lifelong Crabber	the dual permit holders can bring crab into Washington, where I live, from Oregon, the only permit I have. So basically the guys with the most money also follow less rules. So change that please. I'd like to come home to llwaco from the ocean instead of having to go into Warrenton. Whether I sell the crab in Washington is less important. The expense of the many many hours traveling up and down the river forces my hand constantly to sell them much more often and for less money than I would without the stupid rules. For example these past couple trips, the crew wants valentines off, the market wants crab more than ever and the price if going up daily, if I could just tie up at home and check on the boat without having to spend hours on the road and hundreds on transient moorage I could have made thousands more dollars this week. Without the constant going into Oregon for the sake of compliance I could have saved hundreds of gallons of diesel this year alone and the associated engine oil. If not for the sake of fairness or to help the Oregon only permit holders make and save more money, please do it for the ecosystem.
2/13/26 21:59:55	Jesse Northup	NSE127LLC@gmail.com	bay crab permit holder and commercial fisherman	are you trying to destroy our crab industry? why can't pots be used in commercial oregon bay crabbing? you give us 15 ring traps that produce nothing to catch! then you are trying to regulate even more Ocean dungeoness crab by restricting where to crab and when to crab and when to start crabbing! better step up your game to help the crabbers remain in business! but you don't care and follow suggestions by people who control the industry, shame on you! be fair as it's the landing taxes that keep you in business
2/13/26 22:06:51	Vanya Taylor	Taylorvanya@gmail.com	Stakeholder	Please stop bowing down to groups hell bent on shutting us down one rule at a time. Whales aren't an issue in Oregon. The issue with marine life in general is large cruise ships loaded with the same people trying to shut us down plowing through oceans and inlets at 18+ knots..... or the same people who rely on tankers bringing them the products they buy on Amazon. The commercial crab fishermen in Oregon are already suffering and being forced to move gear and buy special colored ropes. How is this affordable? It never ends. The ocean is polluted, consumers rely on tankers bringing cheap products from overseas and the same people wanting to shut us down are being funded by special interest groups. Is Oregon going to be a pawn in a game of chess? Also for what it's worth if these new rules get implemented I promise Oregon is going to be on the hook for hard working fishermen's families loved ones dying because any new rules will make us push harder and ignore the weather because that's the only choice we'll have. It'll also make us push harder to recover from losses in one fishery and extend into other fisheries. Knowing that the state is culpable from the minute they read this. I suggest it's prudent to do a safety assessment before implementing new laws/rules. Unless the cost of human life isn't as important as a possible whale life.  Whales aren't a problem in Oregon.
2/13/26 23:19:13	George becker	georgetabeta@gmail.com	Captain	The boat is fish is only 300 pot permit and we employ or up to 12 people really on it. We are already forced to get new rope and now taking are summer crab away. We get screwed on salmon season every year. We can really rely on salmon starting on time or even get a good qota. Black cod prices suck can't rely on that. Screw the eco terrorist and get a back bone and help us fisherman out

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/13/26 22:25:44	Brett Webb	brettwebb13@gmail.com	Permit holder, port commissioner, city councilor	<p>Good day Commissioners</p> <p>I would like to thank you for your often thankless, but incredibly valuable and difficult service to the great State of Oregon.</p> <p>My name is Brett Webb, and am writing to you today to offer insight and testimony into the critical decisions you are currently charged with making and soon. I use the term critical, because the wrong decision now, would decimate not only a proven, 100% sustainable fishery, but it will shift effort from that sustainable fishery, onto more volatile fisheries. For example, in Port Orford, effort would shift to the closely monitored and managed Nearshore fishery. Having been an advisor to ODFW for a decade or more, my intimate understanding tells me this would absolutely result in the collapse and closure thereof. Unprofitable harvest levels would cause permit sell offs and real hardships. The resulting economic situation would be catastrophic, for the community which I represent in two unique governments. The Port of Port Orford, operates on revenue derived from small, day boats that use sustainable methods. The Port along with the fleet has been involved closely with ENGOs and ODFW in creating Oregon's first Marine Reserve, paving the way for others and setting an example for other communities. We have been doing it right, with even NOAA naming the Port of Port Orford a global model and continues to partner with the port on upcoming and current projects. The City, credits about 35% of our local economy to the Port. Without that contribution, the fragile budget requirements would cease to be met. This is not a scare or an unreasonable statement. This is a fact. Oregon governments are cash strapped, and Port Orford is no different.</p> <p>The steps taken by ODFW have been thoughtful and driven by science, not beliefs. The fleet has been an example of stewardship, second to none. We love whales too, I have countless hours of video containing different species of whale at work and play. I regret any loss of marine mammal life, and as a grabber, I've been happy to comply and agree with the establishment of late season requirements and limitations. Line marking, depth restrictions, etc all have been easy to support. In contrast, I strongly oppose mandating pop-up gear for several reasons, but mostly because it will usher in the trashing of the seafloor with lost gear. The time is now to tell the complainant, petitioners to look at the big picture, the potential wipe out of nearshore species and the wipe-out of a proven model. Let's meet them halfway, but hold firm the need for our coastal communities to continue to harvest Oregon's most profitable and sustainable seafood.</p> <p>The ESAs a good thing, but the stock assessments lack robust updates. We are being asked to close and alter fisheries in real time, while the stock assessments are not even close. We need toll free hotlines to report healthy whales, frolicking in Oregon's pristine waters, not just opportunities to report entanglements. We need real, fair goals, not moving goalposts. We need healthy whale populations and healthy coastal communities.</p> <p>I urge you to reject unreasonable measures that would leave Oregon's coastal communities like mine, in total collapse. Let's take a look at California and study the results, and in a decade, revisit this ropeless idea. There will be collateral damage with that gear I can almost promise, as what's intended, isn't always realized.</p> <p>Thank you for taking the time to consider my input, thoughts and fears, and my your maker help guide you through the most consequential decision you will probably ever make in your life..</p> <p>Feel free to contact me if I can help clarify any misunderstandings.</p> <p>Warm regards and CHEERS!!</p> <p>Brett Webb 541 366 1888</p>
2/13/26 23:23:18	Mark Hippensteel	hippensteelmark@gmail.com	Commercial fisherman for 30 years	Does anyone know the effects this will have on our entire coastal communities?(Whale entanglement implication) Many small boat operators are all ready saying that this will put them out of business including the one I work for every winter F/V Vengeance Ilwaco, wa. We as a whole cannot allow this to happen. I have been on the ocean my whole life & I know for a fact that these whales are already dead when they drift into crab gear. There isn't enough facts that are given just speculation to warrant these crazy ideas presented by these radical environmental groups.
2/13/26 23:43:14	John	hookieleach_68@yahoo.com	45 year Commercial Fisherman	Being forced out due to inept regulations
2/14/26 0:32:50	Dustin Campiche	dlcampiche@gmail.com	Commercial crab fisherman	The coastal dungeness crab fishery simply cannot continue to receive the onslaught of regulations which continue to be imposed upon it on an all too regular basis! Plain, and simple... You are putting the most lucrative fishery on the west coast in severe danger of no longer being able to be the vital support system which sustains countless small port communities through the winter months year, after year. The state of Oregon has already forced it's crab fleet to harvest their crab inside of 40 fathoms of water beginning May 15th each year due to concerns over whale entanglement issues. Now it's proposed to shorten our season by another month, and a half, forcing their fisherman to have their traps removed from the deep by April 1st? Personally our operation would choose to harvest crab between 40, and 60 fathoms every year until after the 1st of June each season. With our season being delayed for either meat recovery shortcomings, or domiac acid levels being above industry guidelines, and other issues beyond human control, often lasting beyond January, and some years into February you will be taking away such a huge percentage of our season that a vessel can no longer get enough days on the ocean to produce enough product to turn a profit for the vessel owner, and her hardworking crew. In the commercial fishing industry, time is money, and when you cannot put in enough days at sea, it is impossible to benefit enough financially to sustain a profitable existence. And basically removing 45 days of my season will bankrupt my operation, and starve out my loyal crew I have employed for a decade or more. And without the crab fleet our already struggling coastal communities will take a revenue hit that will collapse from under our feet. The dungeness crab industry is their lifeline bringing in tens of millions of dollars annually. Hundreds of jobs will be lost, and families will be crushed, and pushed out of town. Thank you for your time, and please fight for our fishing families, and let us feed the world from our hard work, and the love the ocean supplies from our efforts. Support the people who risk their lives to keep food on the world's table.
2/14/26 4:05:50	Steve Berliner	Berliner932@gmail.com		<p>I am a deckhand with over 20 years in this fishery. Instead of making changes that make harvesting crabs more difficult, time consuming, expensive, less efficient. Instead let us longline our gear. This would be an improvement, more efficient and cure any problems. A perfect compromise.</p> <p>I am a deckhand. Over 20 years running crab gear. If you are going to make changes to our fishery, instead of making things more complicated, expensive, time consuming, and over all less efficient, instead let us longline our pots. Problem solved. Too many mouths depend on this fishery. Please do not destroy it.</p>
2/14/26 6:34:28	Paul Johnson	pmjglass@gmail.com	Oregon Crab Permit holder 300	State of Oregon should not entertain this petition to revise the crab fisheries rules. The state does not need to appease them. They have no stake in the fishery, they do not care for the whales. We have not Caught more than maybe 5 whales in Oregon in my life (I am 30) it has not happened at all in the area where I fish with permit 96272
2/14/26 6:44:09	Seth smith	Claminman@gmail.com	Captain	As a small boat crabber this is not a sustainable way for me to stay in business.
2/14/26 7:44:07	David Quashnick Jr	Davidquashnick@gmail.com	28 year crab fishing	I'll keep mine short, all of this whale stuff is a bunch of BS, you've already gone too far with the changing of the line colors. Just ridiculous, there's so many damn whales in the ocean that they are literally getting run over by ships and boats. Get your head out of the sand, you are making yourselves look stupid, to make some tree huggers happy. It's pathetic that we are now fighting for our jobs fighting against a group funded by our tax dollars. How disgusting.
2/14/26 8:13:01	Jeremy McGinness	Jmcginness600r@gmail.com	Vessel owner, crab permit owner.	Whale populations have increased year after year, affected whales have no natural predators, and no real management. If we are truly worried about Whale populations, then lets look into casualties caused by the shipping industry, and stop taking it out on fishermen. Fishermen face plenty of adversity and have many other struggles to overcome without the environmentalist and government trying to do their part in putting us out of business!

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/14/26 8:17:41	Kathleen Hornstuen	90046 Cape Arago Hwy	Charleston Port Advisory Committee	It's time for common sense to rule in Oregon. People need to come before the whims of environmentalists who don't give a care for Oregon, only their agendas. I've written many letters on the devastation this will cause to coastal economies. Enough!
2/14/26 9:26:27	Harry Allen	Fishingeast00@hotmail.com	Commercial crab permit holder	Whale populations are growing. This is an indicator that populations are not being adversely affected by the crabbing industry. No, it is in its last population assessment of key whale species claims. And eight point two percent population growth rate..... That is not a population being affected by the crabbing industry.
2/14/26 9:34:24	Joe Jessal	jjessal@hotmail.com	Commercial crabbing deckhand	After this past seasons low numbers and low price I've had to leave my family and go find other work in Alaska. My family is desperately looking for a win and after last crab season if these restrictions go into place I don't know that I'll be able to continue fishing. We rely on the bigger paychecks from crabbing to balance the lower months of the year. Please don't ruin this fishery.
2/14/26 10:06:22	Zachary Rotwein	Capnzech2@gmail.com	Permit holder	The Humpback Whale is thriving and growing in population at 8% a year. The district population segment that is of concern is growing at 4%. This does not warrant such drastic measures that will doom such an important part of Oregon's coastal economy. Whale worship is driving this push to restrict the crab fishery and religion has no place in fishery management
2/14/26 11:11:08	ROBERT BLOOM	ROB541BOY@GMAIL.COM	commercial fisherman	this overreach from odfw and our oregon government is out of control we cant even make a living anymore fishing keeps me sober if thats gone what do i have
2/14/26 11:17:09	Spencer Anderson	Spencer2135@gmail.com	Permit holder	This will reduce the income of crabbers dramatically. The correct approach would be a state buy back of permits. This is a horrible idea and only sets the stage for wind farms.
2/14/26 11:14:31	Dale Bloom	bloomrod@gmail.com	public	please stop over talking the way we make money away this will stop crabbing altogether odfw cant manage anything
2/14/26 11:20:36	Geoffrey M Molfino, member	molfinog@hotmail.com	Living Pacific Seafood LLC - Oregon Commercial Buyer's License 1151	I would request an opportunity to briefly address the Commission on 2/20/2026 expressing the negative impact of this petition's goals on our coastal communities, our industry as buyers and food processors, and the fishermen that risk their lives to provide their catch. Thank you, Geoff
2/14/26 11:25:13	Daniel Jordan	24jgfan24@gmail.com	General Public	I love Eating Crab and supporting our local Fishing Fleet. I feel that your proposals will Hurt our community and raise prices to where the average family would be able to afford to eat our local Crab. This is bad for the OREGON and I don't be leave it will do anything for the environment.
2/14/26 11:22:35	steven ednie	sedie53@gmail.com	general public	i feel that there has not been sufficient evidence on whale death to say whales in Oregon have died because of crab gear. whales die and drift and may be come entangled in gear after their death
2/14/26 11:39:31	Pamela Jordan	24jgfan1@gmail.com	General Public	I love Eating Crab and supporting our local Fishing Fleet. I feel that your proposals will Hurt our community and raise prices to where the average family would be able to afford to eat our local Crab. This is bad for the OREGON and I don't be leave it will do anything for the environment.
2/14/26 11:44:58	Kevin Smith	Zenasdad51@gmail.com	My brother owns Betty K charters.	I don't think that O DFW Should be overstepping their boundaries. I'm telling people. What they can and cannot use as gear. I also don't think they should be setting limits so low that the public doesn't want to pay for charters. When they are only allowed to catch just a few fish. Thank you.
2/14/26 11:40:34	Stephen Bicknell	91346 Barklow Lane Coos Bay Or, 97420	Concerned sport fishermen .	They are already telling the fishermen where to fish and not fish to protect the whales and that is what this is all about, by making commercial fishermen buy all this expensive Popup Gear it will be adding tackle expense that a lot of these fishermen cannot afford. This will put many families out of business, and I think this is an expense we cannot afford thank you for your consideration Stephen Bicknell.
2/14/26 12:03:39	Jennie Nelson	jennie7437@hotmail.com	general Public	save our fishing Fleet
2/14/26 11:39:43	Erin Nelson	Emspace00@gmail.com	Public	Crabbing is a industry
2/14/26 12:39:18	Richard Dillard	richarddillard@hotmail.com	general public	Try walking a mile in the shoes of fishermen and their families, then come back and try again, until then, you have no ground to walk on regarding this topic.
2/14/26 12:45:33	Joann Thompson	joannmthompson@outlook.com	General public	I support Charleston Fishing families.
2/14/26 12:20:24	Theresa Parker	Sparkygir127@hotmail.com	General public	This needs to be fought against, this is a detriment to our way of life and will devastate our communities.
2/14/26 12:27:16	Jonathan white	Jwhite27777@gmail.com	Captain of fishing boat	Im a third generation fishermen. I have been in the industry for 17 years with the intent to buy and operate my own boat and permits. I'm fully against these changes as it will be detrimental to many people in the industry, also steer many of us away from pursuing our passion in/for this industry, and affect many jobs created by this industry. Having seen the negative impact in California I feel it will only do the same in Oregon. Please stop and reconsider a better route.
2/14/26 12:44:03	Carol Douglas	carart1@frontier.com	Family of Fisherman	You guys are nuts, this is going to cost each of the small boats over \$125,000 per boat to make this change, do you have that, crabbers I know don't. This is impossible it is going to kill the crabbing industry. Come On Guys - the rope change was bad enough and costly for smaller boat.  Did you ever think that the plastics are killing the whales not the ropes?  CANCEL THIS, CANCEL THIS - IT IS NO GOOD.
2/14/26 12:47:36	Nicole Mayer	nicolemayer600@yahoo.com	significant other of commercial crab fisherman	trickle down effect, this is going to put our crab fleet at a horrible loss & huge amount of money to but new gear that we cannot afford.
2/14/26 13:12:37	Tom Muse	garent1960@gmail.com	Commercial Boat Owner	I 100% do not approve or agree with this petition going forward.
2/14/26 13:23:23	Jack Kirk	captainjackscatch@gmail.com	Commercial Fisherman	I strongly urge you to reconsider implementing the proposed new rules through ODFW which would require Commercial Fisherman to put pop up mechanisms on their crab pots. This would virtually put me out of business. The cost is just not possible for my business. Always more new rules which cost money, with no reimbursement. Crabbing is a vital part of the economy on the South Coast.
2/14/26 12:46:30	Kimberly Bracamontes	kingardenmaintenance@gmail.com	Know Commercial Fishermen	Save our crabbing industry, to make a living and enjoy the product. I do not agree with these proposed changes.
2/14/26 13:29:34	Kathy Kirk	Hikerkathy25@gmail.com	Family of Commerical Crab Fisherman	We would like to express our sincere hope that the new proposed crab regulations/rules be reconsidered. The new rules are cost prohibitive and would virtually put our family out of business. It is a tough market to be in to begin with, new rope colors last year, new pop up pot proposals being made now. Where does it end? We went in the red this year. There is no way we can afford to make the proposed changes. All the smaller crafts are in the same situation.
2/14/26 13:29:41	Victoria Alamar	vickielynn690@gmail.com	Family of Fishermen	Not a smart choice for us small town community.
2/14/26 13:36:38	cheri hennessee	badassqc1969@gmail	i work at hallmark	i think the old way is just

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/14/26 13:40:00	John Alamar	alamarjohn04@gmail.com	family of fishermen	it would cause a manger fall i small town communities on the oregon coast.
2/14/26 13:41:25	Robert W. Morrow	morrowwhit@yahoo.com	Deckhand	I feel that with new regulations it will put small businesses ( smaller boats) out of business.
2/14/26 13:44:28	Lisa Purkey	lisapurkey7546@icloud.com	family of fisherman	I have several family that fish, my daughters father passed away at sea and this will devistate our family.
2/14/26 13:52:25	Breezee Hanson	Breezeehanson@gmail.com	General public.	This is ridiculous.
2/14/26 13:51:12	Lisa Peckham	crabbycakesbakery@yahoo.com	general public	Five generation fishing family. So many fishing family lives depend on crabbing.
2/14/26 13:34:52	Shan Smith	shanhan282@gmail.com	Fishing industry	I totally think that is it stupid.
2/14/26 14:06:42	Lisa Peckham	lisapeckham59@gmail.com	general public	Five generation fishing family this will impact so many fishing family income and life.Is not right!
2/14/26 14:08:13	tiffany williams	tiffanyroseevenson89@gmail.com	girlfriend	good way to put small family business out of work
2/14/26 14:21:53	Karen Maurer	kmaurer199@gmail.com	genera public	a very expensive law that will raise the cost of crab. Am against this.
2/14/26 14:51:17	David Schellong	Schellongdavid1@gmail.com	Deck boss Crabber	35 years of Crabbing
2/14/26 14:11:32	frankie alvarado	frankieanover22@gmail.com	crabber commercial fisherman	odfw can suck it we need crabbing to continue this is just communist
2/14/26 14:53:51	Sheryl Armstrong	sannette56@gmail.com	General public	This would cause such a hardship for our small little communities
2/14/26 14:27:10	Greta Horn	gretahorn4@hotmail.com	Seafood Buyer/Dealer	Let small boat crabbers crab.
2/14/26 15:01:27	Casey Horn	tuffluck64@hotmail.com	fishing industry	Keep small commercial boats fishing!!!
2/14/26 15:26:20	Peter Schulzke	oregonpaw@aol.com	public	please no it not necessary
2/13/26 16:09:49	Patsy Miller	mema_17@icloud.com	general public	<p>My name is Patsy Miller, and I am writing in opposition to the petition currently before the Oregon Fish and Wildlife Commission.</p> <p>I am a grandmother and a proud supporter of Oregon's fishing families. My grandson is 32 years old and has been preparing to take the helm of our family vessel since he was 16. I have watched him grow up on the docks, learning not only how to fish, but how to respect the ocean and the life within it. I hope one day to watch him take the helm knowing the industry he has trained for is still viable and strong.</p> <p>I care deeply about whale conservation. I believe in protecting marine life and preserving our oceans for future generations. But I also believe in protecting the families who have devoted their lives to working responsibly on those same waters.</p> <p>From what I understand, fishermen have already invested significant time and money to comply with recently adopted rules designed to reduce entanglement risk. Before adding new requirements, those measures should be given a fair chance to work. Families like mine have made decisions in good faith, trusting the regulatory process.</p> <p>When rules change repeatedly before existing measures are evaluated, it creates uncertainty for the next generation trying to carry on this work. This fishery is not just an occupation — it is a heritage and a responsibility passed from parent to child and grandparent to grandchild.</p> <p>I respectfully ask the Commission to deny this petition and allow the current measures to be evaluated before imposing additional burdens on fishing families who are already striving to do the right thing. Thank you for considering the voices of families who care about both conservation and the future of Oregon's coastal communities.</p> <p>Patsy Miller, Coos Bay, Oregon</p>
2/14/26 15:36:49	ray cox	raydcox@gmail.com	owner of giddings boatworks	this new law or rule affects more than fishermen it effects the whole community when the fishermen don't make money they don't spend it
2/14/26 15:45:01	Nicole Stagner	stagnic@hotmail.com	General Public	The commercial crabbing industry is a major job contributor. Starting with the boats, the processing of the crab, the shipping (trucking) of the product. the trickle down effect of shutting down the Oregon Crabbing industry is only helpful to the bleeding hearts that are trying to save a few whales. The financial impact to the state of Oregon will be largely negative if the Crabbing Industry is forced to shut down in Oregon.
2/14/26 16:43:43	Karie Silva	jeanettemarrie.93@gmail.com	Owner/operator commercial fishing vessel	<p>Good afternoon, Madam Chair and Commissioners,</p> <p>Thank you for the opportunity to comment on the petition submitted to you on December 11, 2025.</p> <p>My name is Karie Silva. I am the co-owner of the Jeanette Marrie out of Charleston. We are a multi-generational fishing family with 44 years in the fishing industry, including 24 in the Oregon Dungeness crab fishery. My comments today reflect our direct experience fishing under Oregon's regulatory framework and living with the consequences of those decisions.</p> <p>There is no question that Oregon Dungeness crabbers support whale conservation and entanglement risk reduction. A healthy ocean is essential for our livelihoods, and for decades, fishermen have played a crucial role in conservation efforts. The question before the Commission is whether this petition is evidence-based, proportional, and ready for implementation.</p> <p>From an operational standpoint, repeated changes before existing measures—like the multi-state line marking already adopted—create instability, especially for small family-owned operations like ours.</p>

Start time	Name2	Email Address	Affiliation or type of s	Comments
				<p>Since November of 2024, we have invested roughly twenty thousand dollars in Oregon-compliant, color-specific rope to meet the adopted multi-state measures for our vessel, with additional thirty thousand dollars upon completion. Those purchases were made carefully and deliberately, based on the understanding that these were the requirements we were expected to meet - all in good faith.</p> <p>The petitioners are now expecting fishermen to comply with additional requirements, including pop-up gear which would add over a hundred thousand dollars in expenses—displacing the prior investments and adding real financial strain.</p> <p>For fishing families like ours, these decisions are not hypothetical. They are real financial risks taken with trust in the regulatory process. When requirements shift after those investments are made, it creates strain and uncertainty—not because we have unwillingness to comply, but because we have already stepped forward in reliance on the rules that were put in place.</p> <p>For these reasons, along with my written comments already submitted, I respectfully urge the Commission to deny the petition and allow the recently adopted multi-state line marking measures to be evaluated before imposing additional requirements and adding financial strain on small family-owned operations participating in the Oregon Dungeness crab fishery.</p> <p>Thank you for your consideration, Karie Silva</p>
2/14/26 18:03:47	Evon Behrens	Evonbehrens@gmail.com	Mother of fisherman	Please vote this down
2/14/26 18:28:04	Eric Green	Betterfishllc@gmail.com	Permit holder	<p>To whom it may concern:</p> <p>I am a newer crabber. I own, with a partner two boats one with a CA permit and a smaller one with an Oregon permit. I have spent the last decade of my life investing my time, money and sweat into this business because I believed it had an economically viable future for our families and crew and that it is a truly sustainable fishery.</p> <p>I don't want to be overly dramatic, but the best analogy I can come up with for this petition would be if an NGO or any other party came to the door of my house and told me that they had some good news and bad news. The good news being that I can keep my house, the bad news being that they were removing the doors, windows and roof and that those could never be replaced under new statutes. This would render my home no longer an economically viable investment nor a sustainable shelter.</p> <p>Under the proposed petition our business would not survive, we would not have the stability or pulling power necessary on our 25 ft platform to safely or effectively longline pop up gear. We also do not have the financial resources to invest in the new technology and a bigger boat to carry on. Our permit and vessel's value would be slashed to a fraction of what we paid our hard earned dollars on to acquire said vessel because it would take an astonishingly risk-tolerant person to invest hundreds of thousands of dollars into a newly unstable and now even more volatile industry.</p> <p>It is in the best interest for Oregonians and particularly coastal communities for ODFW to reject this petition, and if compromises must be made to the current regulations to protect marine mammals then consider alternatives such as permit buy backs or a lesser gear reduction to the gear stacks across all permit tiers.</p> <p>Further investigation into whale populations and DNA to confirm annual growth levels and adjust accordingly from year to year the allowable interactions with these majestic and beloved cetaceans. It seems extremely hasty to assume that a few interactions annually is devastating to the population albeit sad. Let's take our time to figure out what is really going on with the population and whether a few interactions is truly a threat to the population maintenance or growth.</p> <p>Further more, it is important to consider the socio economic impacts to the human populations of Oregon's depressed and rural coastal communities when potentially slashing an important coastal economic sector like Dungeness crab.</p> <p>Please take your time, to consider alternative solutions to the gear interactions. Let's collaborate and come to the table with unbiased and open minds regarding compromises that won't endanger so many livelihoods and frankly human lives.</p> <p>We have witnessed first hand how increases in regulatory statutes have decimated the viability of the California fishery, let's not let the same happen to Oregonians.</p> <p>Thank you, Eric Green</p>
2/14/26 19:24:49	Christine Coviello	Justinschriscee@gmail.com	General public.. ex crab processor	Please revise
2/14/26 19:25:15	Ellen FitzHenry	Stubbi34@yahoo.com	Public	If this passes, it will kill our crab & fishing industry. These are working families you will put out of work. I hope you listen to the public on this item.
2/14/26 19:40:55	Colton	Colton.j.slaymaker@gmail.com	General public	Let us fish
2/14/26 20:13:06	Ryan Esparza	Esparza19d@gmail.com	Dungeness crab Deckhand in Winchester Bay oregon	I oppose this petition to change the oregon crab fishery I any way. This will severely and negatively impact the livelihoods of thousands of crab fisherman and women throughout the state of Oregon. The dungeness crab fishery is an integral part of our history and culture. Without the proper research of whale impact I strongly urge our odfw and other parties put a stop to any hasty rule changes to our time honored tradition and industry. DO NOT FALL FOR THE HYSTERIA OF A FEW ACTIVISTS WHO ONLY WANT TO DESTROY AND DO NOTHING BUT SUE FOR THEIR OWN INTERESTS AND HAVE NO REGARD FOR THE LIVES OF REAL PEOPLE. To whom it may concern protect our fishery and way of life. Signed a concerned father and fisherman, Ryan Esparza.
2/14/26 20:40:44	Darlene krake	Dbob@rconnects.com	General public	I oppose the new rules. Our fisher families and ports can't sustain these expensive changes. Are you going to provide the funding so that these changes can be made.? We need support not continual hand out for more money. We need to support our communities.

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/15/26 5:11:48	Patty Freerksen	pattyfreerksen9@gmail.com	General public	Please stop this
2/15/26 7:03:48	Marcus Eaddy	Midorimarcus@gmail.com	General public(permit holder)	Please send me revisions on rules
2/15/26 8:45:30	William J. Bartlett	wahoo.willy.bartlett@gmail.com	Captain	Support Local Fisherman they work HARD
2/15/26 8:59:04	Kathryn Cvitanovich	pritchard297@gmail.com	general public	<p>Comment Opposing December 2025 Dungeness Crab Petition</p> <p>Members of the Oregon Fish and Wildlife Commission, my name is Katy Cvitanovich, and I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery.</p> <p>I care deeply about whale conservation and about the coastal communities whose livelihoods depend on a stable, responsibly managed crab season. Those priorities are not mutually exclusive, and Oregon has been working to address both through science-based, adaptive management.</p> <p>This petition proposes rigid, permanent mandates through the petition process at a time when Oregon is already engaged in active risk-reduction efforts and ongoing federal coordination.</p> <p>In 2022, the National Marine Fisheries Service denied a similar petition advancing comparable arguments about West Coast whale impacts and mandatory regulatory triggers. After reviewing the best available science, NOAA concluded that whale populations were stable or increasing, that existing measures were not impeding recovery, and that the requested actions were not necessary or appropriate at that time. That precedent is instructive.</p> <p>ODFW and the Commission are already implementing pot reductions, depth restrictions, gear-marking requirements, derelict gear programs, and in-season adaptive measures. The Department is also advancing an experimental framework for pop-up gear and continuing work on Oregon's Conservation Plan and pursuit of a federal Incidental Take Permit. Completing Oregon's Conservation Plan for the commercial Dungeness crab fishery and moving through the federal Incidental Take Permit process is the responsible path toward long-term compliance and sustainable conservation.</p> <p>The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports vessels, processors, and coastal families statewide. The petition's proposals would eliminate significant fishing opportunity and impose substantial costs without a credible economic analysis or resolution of safety and enforcement concerns. Policies that fundamentally reshape a fishery should be grounded in Oregon-specific data and operational feasibility.</p> <p>Oregon's strength has been its ability to respond to changing ocean conditions in real time. Preserving that adaptive management framework is critical. For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's ongoing, science-based processes to move forward.</p> <p>Thank you for your time and consideration of this impactful issue.</p>
2/15/26 9:30:54	Ed Green	edgreen2018@gmail.com	Captain of crab fishing vessel	With 26 years in the fishery I haven't seen the need to further regulate the fishery. We are spending thousands of dollars to make a color coded gear pile in the name of the whales. I ask that for the good of the industry that you consider not adopting any further regulations until you have some real science about the danger of entanglement. Thank you for your time, Ed Green F/V Big Dipper, Astoria Oregon.
2/15/26 9:37:44	Jerry Gillgren	Jerry@malamachartershilo.com	Fisherman	Please revise regulations for commercial Dungenous crab take in Oregon. These current rules hurt local and independent fishermen.
2/15/26 9:38:42	Whitney Trent	74shootingstars@gmail.com	General Public	This will cause many people, businesses, and families an unnecessary burden and hardship
2/15/26 9:13:21	Matthew Forve	mforve@gmail.com	Boat and crab permit owner/operator.	<p>Dear ODFW Director and Staff,</p> <p>I am writing as a concerned stakeholder in Oregon's coastal fisheries, based in Newport, to advocate for a necessary restructuring of the commercial crab fishery. My goal is to highlight opportunities for nearly eliminating whale entanglements while simultaneously enhancing the economic prosperity and overall well-being of the fleet. As someone deeply invested in sustainable marine practices, I believe these changes could create a more balanced, safer, and profitable industry for all involved.</p> <p>I find it unacceptable to allow whale entanglements in our fisheries. These incidents not only harm whales but also tarnish the reputation of Oregon's fleet and lead to costly restrictions. I support taking decisive action to eliminate this risk. One of the most effective ways to achieve this is by reducing the number of vertical lines in the water. This can be accomplished through the adoption of long-lining techniques for crab pots. Such a shift would minimize the entanglement hazards without compromising the fishery's viability.</p> <p>To implement this, we must address the current overabundance of gear in the ocean. Oregon's crab fishery is so intensive that the vast majority of the season's catch is harvested within the first two weeks or less. This rapid pace stems from an excess of pots, which floods the market and drives down prices. By reducing the total number of pots allowed—while permitting long-lining—we can slow the catch rate, prevent market saturation, stabilize prices, reduce operating costs, and foster long-term market development, ultimately leading to greater economic prosperity for the fleet.</p> <p>If we eliminated half of the gear and fished strings of 25 pots each, a 500 pot permitted boat would go from fishing with 500 vertical lines to 10 vertical lines. These lines could have less scope and a larger buoy resulting in a more taught line that would be much less likely to entangle anything. Adding the ropeless technology to this would not be a benefit because malfunctions and strong currents would create gear loss, outweighing the benefit of the ropeless technology.</p> <p>Any reduction in the number of pots per vessel must be approached thoughtfully to avoid disadvantaging larger boats that have invested heavily in building their competitive edge through expanded capacity. At the same time, many smaller boats are struggling to maintain operations amid the broader economic challenges facing Oregon's fisheries, such as the lack of salmon runs and poor market conditions for groundfish and their owners are eager for viable retirement options. To balance these dynamics, I strongly recommend allowing the stacking of permits—enabling multiple permits to be consolidated on a single boat. This would provide a pathway for some fishermen to retire gracefully while allowing others to retain sufficient pots to keep their larger vessels and crews operating efficiently.</p>

Start time	Name2	Email Address	Affiliation or type of s	Comments
				<p>Such a policy would promote fleet consolidation in a fair manner, supporting both economic viability and generational transitions within the industry.</p> <p>Beyond economics, this restructuring would significantly improve the quality of life for captains, crew, and shore workers. The current model often requires working day and night during those initial intense weeks, leading extreme fatigue and heightened safety risks on the water. Lack of sleep is a well-documented predictor of long-term mental health issues, and this grueling schedule is both dangerous and unhealthy. A slower harvest would promote a healthier work-life balance, reducing burnout and accidents while allowing shore workers to process catches at a manageable pace. In essence, these changes would create a safer, more sustainable lifestyle for everyone in the industry.</p> <p>I urge ODFW to consider these reforms as part of ongoing discussions on fishery management.</p>
2/15/26 9:13:36	Lori Wraith	luckyamyllyn@gmail.com	Owner crab permit Oregon fished 52 years.	The industry regulates itself It is a model of successful management. The whale population is stronger than ever. People need protein and we are the local providers. Please look at the fishery. It is golden, thank you for your time.
2/15/26 10:51:34	Brian Scott	Scotbaj@yahoo.com	General public	Please don't set more restrictions on the Dungeness crabbing season. Don't take the experience of the Oregon coast away. Please do something about the green crab invasion. Thank you Save our State!
2/15/26 11:01:16	Tiffanie Young	Youngdt@outlook.com	General public	Please don't make it harder and more expensive for Oregonians to live and work. We all know that Whales are recovering wonderfully. More whales will always mean more of them that eventually pass away. Stop blaming the people who provide you with food
2/15/26 11:01:36	Judy Fisher	Judyfisher3058@yahoo.com	General public	Do not change the current rules for Dungeness crab fishing. The whales are increasing and we need the jobs the crab fishery supports.
2/15/26 11:11:40	Samantha Aho	Sammyaho6942@gmail.com	General public	Making all these boats change the kind of crab posts is absolutely the silliest thing around. All this is going to do is kill our community's. How dare this even be an issue.
2/15/26 11:33:19	Nicole Pedersen	Nicole.pedersen@hotmail.com	General public	Please deny the current petition to revise and further restrict commercial Dungeness fishing in Oregon. I'm a lifelong Oregonian and have friends, neighbors, and associates who are in the industry, however it requires no such ties to see that this petition is unduly harmful to commercial fishermen, their families, the economy, and subsequently tax payers as a whole. Not only that, but it is entirely unnecessary; federal data notes that whale populations have been on the rise healthily. Please reject this permanent, harmful revision.
2/15/26 11:37:24	Larry Reiber	larryr@scovillereiber.com	General public	Can you provide data on the Whale population growth or decline over the past 10 years? With that can you provide data as to the growth or decline of entanglements? Can this, entanglements, be provided as a percentage of the whale population on a yearly basis or as each census was taken per year taken. Thanks
2/15/26 11:08:04	Tony Pettis	emailtonyettis@gmail.com	commercial fisherman	<p>My name is Tony Pettis. I am a 3rd generation commercial fisherman. I am the owner and captain of the F/V Heidi Sue out of Newport, Oregon.</p> <p>I take a lot of pride in the fact that the Dungeness Crab fishery is a major economic driver for the State of Oregon. My boat is a small business that directly supports 5 families with living wage jobs, but this is just the start of the story. The responsible and sustainable harvest of natural resources like Dungeness Crab brings new money into the state and national economy that everyone benefits from.</p> <p>I have major concerns about this petition for many of reasons, and I know that you are hearing a lot about my concerns from other stakeholders as well. Out of respect for your time, I am going to try to limit redundancy by focusing on just one of my concerns. The concern at the front of my mind is that this petition aims to sever the relationship stakeholders have built over decades of working together towards real world solutions to management issues.</p> <p>We as fishermen and women have worked hard alongside fishery managers, scientists, NGO's and many others to find real world solutions to complex problems for generations. We have built trust on shared values, and a shared goal of protecting and enhancing ecosystems while at the same time supporting thriving industries that our state and national economy depend upon.</p> <p>I am asking you to reject this petition, because it aims to destroy these vital relationships. We have made great progress in the management of the crab fishery, and yes, there is more work to be done. This work will require collaboration and cooperation and should not be allowed to be hijacked by this petition.</p> <p>For the sake of all current and future Oregonians, please reject this petition.</p> <p>Thank you for your time and consideration.</p> <p>Tony Pettis - F/V Heidi Sue</p>
2/15/26 14:07:51	Hank Yolman	Namlofisheriesllc@gmail.com	Commercial fisherman	Please don't change commercial fishing whale entanglement buoy line regulations.
2/15/26 14:33:49	Matt Freedman	drmatt@yahoo.com	general public	<p>I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery. I care deeply about whale conservation and about the coastal communities whose livelihoods depend on a stable, responsibly managed crab season. Those priorities are not mutually exclusive, and Oregon has been working to address both through science-based, adaptive management.</p> <p>This petition proposes rigid, permanent mandates through the petition process at a time when Oregon is already engaged in active risk-reduction efforts and ongoing federal coordination. In 2022, the National Marine Fisheries Service denied a similar petition advancing comparable arguments about West Coast whale impacts and mandatory regulatory triggers. After reviewing the best available science, NOAA concluded that whale populations were stable or increasing, that existing measures were not impeding recovery, and that the requested actions were not necessary or appropriate at that time. That precedent is instructive.</p> <p>ODFW and the Commission are already implementing pot reductions, depth restrictions, gear-marking requirements, derelict gear programs, and in-season adaptive measures. The Department is also advancing an experimental framework for pop-up gear and continuing work on Oregon's Conservation Plan and pursuit of a federal Incidental Take Permit. Completing Oregon's Conservation Plan for the commercial Dungeness crab fishery and moving through the federal Incidental Take Permit process is the responsible path toward long-term compliance and sustainable conservation.</p> <p>The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports vessels, processors, and coastal families statewide. The petition's proposals would eliminate significant fishing opportunity and impose substantial costs without a credible economic analysis or resolution of safety and enforcement concerns. Policies that fundamentally reshape a fishery should be grounded in Oregon-specific data and operational feasibility.</p> <p>Oregon's strength has been its ability to respond to changing ocean conditions in real time. Preserving that adaptive management framework is critical.</p> <p>For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's ongoing, science-based processes to move forward.</p> <p>Thank you for your time and consideration of this impactful issue.</p>
2/15/26 14:37:19	Eli	Ingibjork80@gmail.com	Fisherman	We are already some of the most heavily regulated fisheries in the world. More rules and regulations are just going to further harm fishermen and their families.

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/15/26 15:01:18	Joe Salvey	Kaelebelle@gmail.com	Permit holder vessel owner captain and employer	<p>Dear ODFW commission please reject this petition in its entirety!</p> <p>If you allow this petition to go through, it will effectively put my vessel and my permit out of business. I do not have the capabilities or the vessel to implement this unstudied un verified pop-up Gear. I am already on the smaller scale of crab vessels, implementing any part of this petition, will financially devastate my business, render me, incapable of hiring employees, and put my vessel and my crew in unsafe situations jeopardizing our lives.</p> <p>This impact will cause financial hardship and financial ruin for the industry!</p> <p>You have a population of Whales that based on NOAA'S own stock assessment is showing strong recovery trends and exceeding scientific expectations. With populations increasing at significant annual rate rates showing that whale populations were stable or increasing and existing measures in place were not preventing the recovery of this species.</p> <p>Noaa has already rejected one of these money grab petitions by these NGO'S.</p> <p>I ask you commission members responsible for Oregon economic resource to completely deny this petition in entirety!</p> <p>Thank you</p>
2/15/26 15:08:47	James and Sharon Erb	jimerb51@msn.com	General Public	<p>My wife and I are coastal residents. We respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635 Division 5 governing the Oregon Commercial Dungeness crab fishery. Bring a coastal resident I care deeply about our coastal communities that depend on a stable responsibly managed crab season. This petition would put many of the smaller boats out of business. This at a time when small business is struggling and many large employers are leaving the state. Unemployment in Oregon is nearly the highest in America. Whale populations are stable and increasing according to all the best available science that I have seen. The Dungeness crab fishery is prized by consumers and is Oregon's most valuable single species commercial fishery. It supports vessels, processors, and coastal families. The petition's proposal would eliminate the significant fishing opportunity and impose substantial cost without a credible economic analysis or resolution of safety and enforcement concerns. Thank you for your time and consideration of this impactful issue.</p>
2/15/26 15:18:50	Linda Beyer	lindalbeyer@gmail.com	general public and close friends	<p>" If it's Not Broke, Don't Fix It "</p> <p>I strongly urge the Fish and Wildlife Commission to deny the December 2025 petition seeking Amendments to OAR Chapter 635, Division 5 to Revise Commercial Dungeness Crab Fishery Rules. The Dungeness crab fishery is Oregon's most valuable single - species commercial fishery. It supports vessels, processors, and coastal families statewide. This petition proposal would eliminate significant fishing opportunity and impose substantial costs - essentially, affecting and "BREAKING" many. These are YOUR Friends and Neighbor as well as Mine!</p> <p>For these reasons, I'm asking you to deny this petition.</p> <p>Respectfully, Linda Beyer</p>
2/15/26 15:46:43	Stacie Frye	Frye448@gmail.com	Spouse of Commercial Crabber	<p>We live in a small town. We have small town jobs. I work at a local school and my husband is a commercial fisherman. Our livelihood is his income. He works for a small town, family run operation, who don't have the money necessary for all these un-tried changes you want to implement. I understand whales are an important factor and I would never want untoward harm to them. But in reality, how much would this benefit them? They will still get struck by ships, attacked by predators, die from natural causes. Should we take all ships out of the water to prevent any ship strikes?</p>
2/15/26 15:40:08	Roy Hale	Dorrfishing@gmail.com	Commercial Fisherman	<p>How many whales has crab gear actually killed in Oregon? How many per year? When whale biologists tell me things like whale harassment like the whale watching trips out of depoe bay keep the whales from reproducing. Yet no one is going after them. That tells me it's not really the whales that you're trying to save.</p> <p>I think the new pop up gear is going to take the backbone of the crab fishery meaning the smaller boats out of the fishery. The Oregon commercial fishery is becoming a large boat only fishery. That is wrong to create more rules that handy caps or keeps the small boats from making a profit.</p> <p>There are so many things that man can do to help all fisheries but they do not seem interested in helping. Just run off smaller commercial fisherman.</p>
2/15/26 15:55:37	Richard K Davey	Taxwires*comcast.net	Small tax business	<p>I have customers that this change will put them out of business. Then I will lose their business. So it will be adverse to the Oregon economy in many ways.</p>
2/15/26 16:02:36	Melanie Beetham	Seawindestate@gmail.com	General public	<p>Please shut this down &amp; keep our small communities thriving</p>
2/15/26 16:05:26	Jose Alfaro	Mralfaro@gmail.com	General	<p>I have fish in the Oregon coast for the past 4 years.</p>
2/15/26 16:16:39	Joanne Alfonse	Joalfonse1@gmail.com	General public	<p>This would be devastating. Oregon is built by loggers and fishermen. My ancestors all in fisheries. The idea is far fetched and wrong! MUST BE STOPPED. We rely on the fishing industry. Very bad people are trying to ruin this state.</p>
2/15/26 13:11:36	Julian Seth Whitsett	sethwhitsett@hotmail.com	Permit and boat owner	<p>These measures would greatly impact my small business, and the well being of my family as well as the people that work for us and their families. We employ 3 full time deck hands, plus countless dollars spent at the shipyard on welders, electricians, mechanics, and laborers. There are measures we are currently taking to reduce entanglement risk and we are continuing to add to those measures as we learn more of what poses significant threat. Please deny this proposal and let the fisherman and whale working group come up with a better plan. Thanks for your time.</p>
2/15/26 16:31:18	Sam Juliussen	Oregonsurfer07@hotmail.com	Commercial Fisherman, Captain F/V Nicole Marie	<p>Hello,</p> <p>My name is Sam Juliussen. I'm the captain of the F/V Nicole Marie, a commercial crabber/troller based out of Garibaldi, Oregon.</p> <p>I am writing in opposition to petition from CBD to amend OAR Chapter 635, Division 5.</p> <p>These proposed changes spell the end for many small fishing based businesses up and down the coast. Fisherman that cannot afford the gear change over or whose boats are simply not equipped to utilize the untested "pop-up" gear. Fewer fisherman means fewer crab being delivered, fewer processors, fewer groceries and fuel sold etc.</p> <p>The lifeblood of many Oregon Coastal communities is Commercial Fishing. For these communities, this petition means less tourism, fewer boats, and ultimately fewer jobs in an already upset economy.</p>
2/15/26 16:44:06	Melanie Olson	Olsonfamily2420@gmail.com	Public	<p>This legislation is built entirely on emotion from a single incident and unfortunately in Oregon, that is too often enough to significantly damage an entire industry and the hundreds of families that it supports. I urge you to consider the science that West Coast hump back whale numbers are increasing and the crabbing industry is already heavily regulated. Will this additional restriction be another nail in the coffin for the natural resource industries in Oregon? Will Salem then somehow save the thousands of jobs, families, and communities that depend on this sustainable industry? Seems like Oregon has more pressing matters.</p>
2/15/26 16:57:29	John D. Smith	john@wccharters.com	Retired fisherman and currently owner/operator of TrapMaster. A company for fishermen.	<p>This should not be considered at all. There is nothing wrong with the current rules and regulations that are in place at this time. These people proposing this petition are all about ending commercial fishing as we know it. Use logic and tested science not emotion to make rules and regulations.</p>

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/15/26 16:57:06	Mark Woolsey	coastdiesel@yahoo.com	Marine diesel sales and service business owner	A crab fisherman who cares a lot for the whales and the crabbing industry recently told me something interesting. "Whales can be like dogs; you see smart ones and you see very dumb ones". Work the problem from there.
2/15/26 17:17:21	John Alto	springpersuader@gmail.com	Commercial salmon, tuna, and crab fisherman	The recovery of humpback whales has existed for over 50 years right alongside the dungeness crab fishery. The fact that the whale population has exploded exponentially proves that there is absolutely no risk of affecting humpback whale populations with conventional crab gear. Any further regulation on Oregon's crab fleet will do nothing but drive small vulnerable coastal communities to the brink. Thus far the measure's taken by dungeness crabbers to mitigate whale entanglements has been expensive and industry has bore 100% of the financial burden. This latest move against the crab fleet is just another in a long string of attacks by special interest NGOs against commercial fishing. The petitioner's have been in an all out war on harvesters on every coastline in America. Rather than focus their efforts on IUU foreign fishing fleets they have directed all energy on harming hard working American fishermen who participate in the most regulated and sustainable fisheries on this planet. This petition at face value is about whales, this is the short game. The long game is to regulate us out of business. Please do not consider this petition. Oregon doesn't need special interest groups dictating science and policy.
2/15/26 17:35:23	Elizabeth Laver-Holencik	Eholencik@gmail.com	General public	Please do not restrict crabbing. Whales die, but not enough to restrict crabbing. I am a big environmentalist but I know there is a trade off between humans and animals. The petition seems too extreme without more research.
2/15/26 17:48:11	Brian Eickhoff	brianeickhoff@icloud.com	Fisherman	Please don't change the current management plan
2/15/26 17:49:52	David Pyle	davidpyle@gmail.com	Commercial Fishing	My name is David Pyle owner operator of the F/V Pacific Pacer, and I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery. I care deeply about whale conservation and about the coastal communities whose livelihoods depend on a stable, responsibly managed crab season. Those priorities are not mutually exclusive, and Oregon has been working to address both through science-based, adaptive management. This petition proposes rigid, permanent mandates through the petition process at a time when Oregon is already engaged in active risk-reduction efforts and ongoing federal coordination. In 2022, the National Marine Fisheries Service denied a similar petition advancing comparable arguments about West Coast whale impacts and mandatory regulatory triggers. After reviewing the best available science, NOAA concluded that whale populations were stable or increasing, that existing measures were not impeding recovery, and that the requested actions were not necessary or appropriate at that time. That precedent is instructive. ODFW and the Commission are already implementing pot reductions, depth restrictions, gear-marking requirements, derelict gear programs, and in-season adaptive measures. The Department is also advancing an experimental framework for pop-up gear and continuing work on Oregon's Conservation Plan and pursuit of a federal Incidental Take Permit. Completing Oregon's Conservation Plan for the commercial Dungeness crab fishery and moving through the federal Incidental Take Permit process is the responsible path toward long-term compliance and sustainable conservation. The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports vessels, processors, and coastal families statewide. The petition's proposals would eliminate significant fishing opportunity and impose substantial costs without a credible economic analysis or resolution of safety and enforcement concerns. Policies that fundamentally reshape a fishery should be grounded in Oregon-specific data and operational feasibility. Oregon's strength has been its ability to respond to changing ocean conditions in real time. Preserving that adaptive management framework is critical. For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's ongoing, science-based processes to move forward. Thank you for your time and consideration of this impactful issue. David Pyle
2/15/26 17:57:58	Renee Tarabochia	reneet13@gmail.com	general public	My families job would be on the line.
2/15/26 18:29:56	Michelle clawson	Michelleclaw40@gmail.com	Public	The crab fishing industry has given up enough. Please don't take what little they have left.
2/15/26 18:24:08	Laurie Mills	Lauriem97756@yahoo.com	Commercial crab boat owner	We need to stop making it impossible for these small business owners to be able to make a living. My husband's boat doesn't even make enough for him to collect a paycheck. The way all the prices continue to go up and then new regulations and special interest groups want to put more regulations on these fishermen, by the time they pay fuel, insurance premiums, boat moorage, labor, bait, all the different licenses and documentations and boat payments, there isn't much left for them to live on.
2/15/26 18:54:11	Morris Huckeba	Huck.oregon@gmail.com	General public	Leve the crab rules jest like that are
2/15/26 18:51:17	Rory Cartharius	Rjcartharius@gmail.com	Public	Did you know the whale that beached around November I believe had zero crab line on it and then all of a sudden there is a whole shot on it coiled up nice? Makes me very concerned on why people are attacking hard working folk I mean shrmp prices in 1984 were .54 cent and 2025 it was around 48cent how is this fair? But back to the subject the whale population has been growing and if you ever go out to open ocean you can see them as far as your eye can see ☹️ noaa has truly done the commercial fishing fleet a disservice and I'm truly disappointed in fish and game for holding important meetings during the middle of the season so people don't show, if you don't think I know that People other than Russell that made money off of this ridiculous line change your crazy I'm going to find this corruption and prosecute them but that fact is that you are forcing crews and captains to do unpaid work so I will be sending a invoice and I expect to be paid in full
2/15/26 19:18:28	Adrian spithill	adrienspithill@gmail.com	Commercial fisherman	This is not a proven to be safe it is dangerous out there and could ruien a lot of jobs
2/15/26 19:21:27	Darrell Harper	darrellharper1234@hotmail.com	Boat owner/operator F.V. SealionIII	I would would ask that this petition be rejected entirely. The Idea of moving towards pop up gear is ridiculous. There's no proof it would even help just someone's idea. In a full production crab season. It would cause more harm than good to the ocen an the fleet. Whale populations are increasing at 7 to 10 percent exponentially the last 10 years with a life span of 60 to.80yr. I would say what you are doing is working fine. I see more Grey whales every year than I do humpback where I crab an there are zero Grey whale entanglement. An they do.get sick an die of natural causes.
2/15/26 19:37:22	Eathan	Eathayon@gmail.com	General public	This is insane and will take so many jobs away. Please don't do this
2/15/26 19:28:55	Connie Kennedy	ckennedy1276@charter.net	Fishing family	Oregon already has very thorough fisheries management plans for Dungeness Crab. And all fisheries in Oregon are managed. Changing that in this way is going to hurt fishermen, vessel owners, processors, fishing families, port communities, grocery stores, restaurants, schools, and on down the line. Why this would be allowed to stand is crazy. The fact that a whole industry could be impacted by this is beyond imaginable. Whales do die and often come into the beach to do so. The whales are plentiful.
2/15/26 19:34:20	Juan Aguilera	Aguileracarlos10@gmail.com	General public	We don't need changes to our commercial crabbing regulations or sport fisheries. It may not be a perfect system but it works and does very little harm in the big picture. This would cripple fishermen and markets, retailers, and ultimately the consumers.
2/15/26 19:47:55	Colleen Sederlin	cmsederlin1971@gmail.com	general public	Implore you to not make any changes to the crabbing industry. Leave things as they are!!!!

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/15/26 19:52:57	Georgon Lapham	georgonlapham@gmail.com	Owner/operator F/V Michele Ann	<p>I am a second-generation commercial fisherman from Lincoln County, Oregon. I have been crabbing for 21 years, and more recently I have been encouraged to see my generation become more aware of and actively involved in fisheries management. Being part of this generational shift has motivated me to engage more deeply in the management of and advocacy for our economically and culturally vital commercial fishing industry.</p> <p>I currently serve on the following bodies:</p> <p>Oregon Dungeness Crab Advisory Committee Groundfish Advisory Subpanel, Pacific Fishery Management Council Marine Resources Education Program Steering Committees West Coast Take Reduction Team</p> <p>My involvement has given me a deep appreciation for fisheries management and the critical role that stakeholders play as stewards of public resources. The collaborative process among scientists, industry, and managers — grounded in the best available science — gives me confidence that the positive generational changes I am seeing will continue.</p> <p>The fisheries management systems in the United States, particularly on the West Coast, are widely regarded as transparent, effective, and sustainable. They are frequently cited as models that other nations seek to emulate. It is important to remember that this management system, and the Dungeness crab fishery in particular, has coexisted with the recovery of the two distinct population segments of humpback whales of greatest concern (Mexico DPS and Central America DPS) — from roughly 500 individuals in 1990 to more than 4,000 today.</p> <p>The recent increase in entanglements is certainly cause for concern and warrants ongoing evaluation of how the fishery can continue to adapt in order to reduce entanglement risk while remaining economically viable. This process should be collaborative and ongoing, involving scientists, managers, and industry stakeholders. If, instead, we begin accepting management measures by petition — not because of their scientific merit, but out of fear of litigation — we risk eroding the very values that have made our fisheries management system so well respected.</p> <p>While conservation organizations can and do play an important role, the current petition before the Commission, though legally valid due to the fishery's noncompliance with the ESA and MMPA, does not move the fishery closer to compliance if it is granted. The petitioners are correct to highlight our noncompliance with federal law, but there is no justification for those same parties to then dictate specific management measures that do not actually remedy the violation.</p> <p>Accepting this petition and diverting staff time to analyze the requested changes would only delay the ongoing collaborative work already underway to bring the fishery into compliance with the ESA and MMPA. I respectfully ask the Commission to deny the petition and instead focus on data-driven, testable, and stakeholder-inclusive measures that will bring the fishery into compliance while preserving this iconic public resource for future generations.</p>
2/15/26 20:36:02	Russ Diede	Rdiede@nstractor.com	Owner operator of 300 pot permit F/V Casino	<p>I would love to see at least a 20% pot reduction starting from day one. I would like to see a 75fathom limit put on this would definitely stop the derelict gear from the deep from boats the don't look for a lost pot. I do believe in 40% reduction in may for summer crabbing.</p> <p>I think if we try this and see what happens before we give up on conventional crabbing and in the summer move the fathom line into 30 fathoms</p>
2/15/26 20:44:14	Aaron Lloyd	Alloyd1357@gmail.com	Commercial crab fisherman	<p>Stop with this nonsense of over regulation. You are breaking an industry.</p>
2/15/26 20:50:07	Eddy lon miner	3970 marshall avenue	My friend works on fishing boats	<p>I support fishing boats</p>
2/15/26 20:49:47	David Carney	d_carney1@yahoo.com	General public	<p>My name is David Carney, and I respectfully ask the Commission to reject the December 2025 petition proposing sweeping changes to OAR Chapter 635, Division 5, which governs Oregon's commercial Dungeness crab fishery.</p> <p>I strongly support whale conservation, and I also care deeply about the coastal communities that rely on a stable and responsibly managed crab season. These goals are not in conflict. Oregon has demonstrated that it can protect marine life while sustaining working waterfronts through thoughtful, science-based management.</p> <p>The petition before you seeks to impose rigid, permanent mandates through the petition process at a time when Oregon is already actively reducing risk and coordinating with federal partners. That approach is unnecessary and premature.</p> <p>In 2022, the National Marine Fisheries Service denied a similar petition that raised comparable concerns about West Coast whale impacts and sought mandatory regulatory triggers. After reviewing the best available science, NOAA determined that whale populations were stable or increasing, that existing protections were not hindering recovery, and that the requested actions were not warranted. That decision provides important context here.</p> <p>The Oregon Department of Fish and Wildlife and this Commission are already implementing meaningful measures, including pot reductions, depth restrictions, gear-marking requirements, derelict gear removal programs, and in-season adaptive management. The Department is also advancing experimental pop-up gear testing, finalizing Oregon's Conservation Plan, and pursuing a federal Incidental Take Permit. Completing that Conservation Plan and moving through the ITP process is the responsible, durable path toward long-term compliance and effective conservation.</p> <p>The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery. It supports independent vessels, processors, and coastal families throughout the state. The petition's proposals would significantly reduce fishing opportunity and impose serious economic costs without a credible Oregon-specific economic analysis, and without resolving practical safety and enforcement concerns. Major structural changes to a fishery of this scale should be grounded in sound data and real-world feasibility.</p> <p>Oregon's strength has always been its ability to respond adaptively to changing ocean conditions. Preserving that flexible, science-driven management framework is essential.</p> <p>For these reasons, I respectfully urge the Commission to deny the December 2025 petition and allow Oregon's ongoing, science-based efforts to continue.</p> <p>Thank you for your time and careful consideration of this important matter.</p>
2/15/26 21:08:21	Tessa Knowlton	knowtorius13@gmail.com	General public	<p>I ask that you deny this petition.</p>

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/15/26 21:08:29	Katie Owens	Katielo537@gmail.com	General public	<p>My name is Katie Owens, and I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery.</p> <p>I care deeply about whale conservation and about the coastal communities whose livelihoods depend on a stable, responsibly managed crab season. Those priorities are not mutually exclusive, and Oregon has been working to address both through science-based, adaptive management.</p> <p>This petition proposes rigid, permanent mandates through the petition process at a time when Oregon is already engaged in active risk-reduction efforts and ongoing federal coordination.</p> <p>In 2022, the National Marine Fisheries Service denied a similar petition advancing comparable arguments about West Coast whale impacts and mandatory regulatory triggers. After reviewing the best available science, NOAA concluded that whale populations were stable or increasing, that existing measures were not impeding recovery, and that the requested actions were not necessary or appropriate at that time. That precedent is instructive.</p> <p>ODFW and the Commission are already implementing pot reductions, depth restrictions, gear-marking requirements, derelict gear programs, and in-season adaptive measures. The Department is also advancing an experimental framework for pop-up gear and continuing work on Oregon's Conservation Plan and pursuit of a federal Incidental Take Permit. Completing Oregon's Conservation Plan for the commercial Dungeness crab fishery and moving through the federal Incidental Take Permit process is the responsible path toward long-term compliance and sustainable conservation.</p> <p>The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports vessels, processors, and coastal families statewide. The petition's proposals would eliminate significant fishing opportunity and impose substantial costs without a credible economic analysis or resolution of safety and enforcement concerns. Policies that fundamentally reshape a fishery should be grounded in Oregon-specific data and operational feasibility.</p> <p>Oregon's strength has been its ability to respond to changing ocean conditions in real time. Preserving that adaptive management framework is critical.</p> <p>For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's ongoing, science-based processes to move forward.</p> <p>Thank you for your time and consideration of this impactful issue.</p> <p>Katie Owens</p>
2/15/26 21:17:53	Cody Dew	Codydew29@icloud.com	General public	Keep coastal communities alive and thriving please
2/15/26 21:28:22	Eric Hooper	hfaloha97@gmail.com	48 year commercial fisherman. Owner operator of the fishing vessel Aloha in Brookings Oregon crab permit holder	<p>I am letting you know I oppose the Oregon department of Fish and Wildlife Commission adopting any recommendations from the Center for Biological Diversity petition submitted for review on February twentieth. Fishery management should be apolitical. It should be a collaborative, adaptive approach based on science and the welfare of Oregon's marine environment and communities. It should only be collaborative with entities that strive for the same goals, a sustainable and healthy ecosystem and communities or a conservation strategy. The petition is brought by an organization that is a serial litigator interested in a preservation mandate not conservation. If the State entertains this petition it will transform our collaborative scientific approach to politics. The state will have denied the collaborative engagement with its local fishing communities in exchange for a collaborative relationship with an international NGO that has demonstrated our way of life and fishing communities are of no importance.</p> <p>Thank you for your consideration</p>
2/15/26 21:39:59	Fredrick Berry	Fredvicb@gmail.com	General public	<p>You need to Deny this petition and follow the science. Been telling my friends that one day us recreational fishermen won't be able to crab in ocean just bays.</p> <p>This hole thing reminds me of the spotted owl thing that was shoved on us and we know how that turned out</p>
2/15/26 21:54:22	Anne Olsofka	artdogor@hotmail.com	General public	Deny this petition and allow Oregon's current science-based process to continue.
2/15/26 21:55:37	Naomi Boe	Naomiwarnock@aol.com	General public	Deny this petition and allow current science based conditions to continue
2/15/26 21:54:59	Jordan long	Papi.rocks9999@gmail.com	General public	I have 2 friends who this affects and I know they work hard and provide a great duty to our state.
2/15/26 21:59:46	Barbara Lane	Barbara_anne_lane@yahoo.com	General public	Please do not do this thing as it will kill the small fishermen
2/15/26 22:15:51	Josh Fergusson	Fergusson.josh@icloud.com	No	I truly hope this gets revised
2/15/26 22:32:42	Christopher Douglass	Fishingdoogie@gmail.com	General Public - Recreational Angler & Crabber	<p>Oregon's commercial &amp; recreational crabbing technique &amp; technology do not impose undue risk to whale entanglement to prompt any further regulation or restriction. Your own data (ODFW or NOAA) shows that whale species are still in a population growth trend, not decline.</p> <p>More unnecessary regulations or restrictions will only hurt and destroy our rural coastal communities, not "save the whales".</p> <p>Respectfully, Christopher Douglass 5th Generation Oregonian</p> <p>Lebanon, OR</p>
2/16/26 0:13:15	Josh Schuon	Schuon_services@yahoo.com	Fisherman	Am curious
2/16/26 0:27:55	Brian Van Gundy	bvgundy@gmail.com	General public former deckhand	The current programs have shown to be moving the needle in the right direction.
2/16/26 1:45:53	Wesley Rue	wesleyrue12@gmail.com	General Public	Save our Fishing and Crabbing Fishers
2/16/26 2:59:14	Terrel pope	Terrel_pope@yahoo.com	Permit holder	<p>If you're really trying to save a couple whales, you should take actions that will help the whales the most. For instance. Traffic lanes need to be used by tankers as well. They are the biggest contributor to lost gear. Maybe put a speed reduction on them near the coast. We all know that a sick whale washing up on the beach is going to get entangled in gear in the surf 80 percent of the time. Here we are taking the blame every time one makes it to shore and rolls around in the surf. Too many jobs at risk. Your whole coast is fishing and crabbing. Maybe get rid of the reckless sporties, who have no idea what there doing.</p>
2/16/26 4:16:34	John smith	Josmith2128@hotmail.com	General public	This is ridiculous
2/16/26 4:30:18	Tim k vollins	Oneribshy2@gmail.com	Citizen	Let the guys n girls fish NO MORE RESTRICTIONS.
2/16/26 5:51:43	Ray Driscoll	wrtimber2011@gmail.com	public	We all must survive. Crab fishermen are part of the ecosystem, also. Stop with the rules. Whales are showing an increase in numbers.
2/16/26 5:59:42	Vincent Doyle	vdoyle707@gmail.com	General public	Harvesting Dungeness crab is vital to local economies.
2/16/26 6:34:55	Cody	Codyrc26@gmail.com	General public	This fishery is important to out states income crab is served all over the state and is an income for many businesses not just fisherman from truck drivers to warehouse workers and resteraunts it should be also considered a huge source of protein without adding more cattle farms in place of this.
2/16/26 6:34:29	Jacob mikolet	Jmikolet@outlook.com	General public	Id like to ask that the revision of the crabbing rules does not go forward, our communities will struggle to get by with the fact we are already losing other commercial fishing opportunities
2/16/26 6:12:08	Yuri Prasoloff	Yuriprasoloff@yahoo.com	Boat: Jena C. 26ft Dory Permit: 200 pot : Oregon	<p>Hello to all, this petition needs to be thrown out! I've been to the meetings and listened. Im not qualified to make a decision on whale migration and species,so lets use good accurate science for this process! With the current rules the whale population is increasing. Gear reduction to 40% is a business ender for all of us and a month early, that means I can only use 120 out of my 200 pots. I don't understand why you don't use a tere system if we actually have to go there. The little guys always seemed to get fucked. Let me give you an example of what fair is. Most of or if not all of the big boats with 500 or dual permits are done by the proposed date, why not do this: 500 pots 40%. 300pots 30% 200pots 20% inside 40 fathoms. That's worst case scenario . Starting May 1st of each year. Pop up gear is a financial business ender for the small guys, just getting new colored line has been a financial hit without any support from the state. There are so many areas where pop up gear can't work hard spots, reefs etc, where you have to make strategic drops that are not in straight line. Thank for for reading this, Yuri.</p>

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/16/26 6:51:46	Joe Quashnick	Salmon_snatcher3@live.com	Boat Owner and Captain	This petition would severely hinder how I operate my business and put my employees out of work. I don't have a boat capable of using long line pop up gear. I'm a smaller boat in the fleet that fishes into the summer months. This proposed petition would put me out of work only a couple months into the season if we were to get delayed because of the other issues such as meat quality and domoic acid.  We are spending a huge amount of money changing crab lines and taking measures to ensure we don't get entanglements. Please do more research before you start taking away part out our livelihoods.  Joe Quashnick F/V Leigh High- Owner Operator F/V Patriot Owner
2/16/26 7:07:29	Terry Fisher	tmfisher57@yahoo.com	General public	This is stupid. I've lived in Oregon my whole life. I've never heard of, or seen. Even on the news. Of a whale entanglement with dungeoness crab gear. Oh! I'm also a fisherman. Started in Newport and now fish in Alaska. This is just a liberal, bunny hugging witch hunt. Whale populations are blowing up. This really is a non issue, that's costing tax dollars.
2/16/26 7:25:27	Aleasha Proffitt	Aleasha_hargitt@yahoo.com	General public	Please stop this petition. Our fisheries need science and backed science not more "bleeding hearts" solutions.
2/16/26 7:51:29	Melissa Moon-Suit	Melissamoonsuit@gmail.com	General public	I am opposed to the revision of commercial dungeness crab fishery rules.
2/16/26 7:48:31	Marlene Acker	marlene@nehalem.tel.net	general public	DO NOT DESTROY THIS ESSENTIAL INDUSTRY. The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery. It supports deckhands, processors, small businesses, and entire coastal communities. It supports state and local revenue, including funding that flows to schools and public services. West Coast humpback whale populations have been growing for decades. National Oceanic and Atmospheric Administration stock assessments show strong recovery trends, with some populations increasing at meaningful annual rates. In 2022, NOAA denied a similar petition because the best available science showed whale populations were stable or increasing, and existing measures were not preventing recovery. They have already reduced pots, added depth restrictions and required gear marking. Also invested in derelict gear removal, used in-season adaptive management. The state is actively working on a Conservation Plan and pursuing a federal Incidental Take Permit to ensure long-term compliance and whale protection.
2/16/26 7:50:42	Michelle Mease	Meeshminx@gmail.com	Small business owner	My husband and I have invested our life savings and gone into massive debt to start our crab fishing business and provide a livelihood for our 2 kids and someday a retirement for ourselves. My retired parents(also crab boat owners) are also completely reliant on the crab fishery for their retirement. These new potential regulations would ruin our lives along with thousands of other coastal families and for what? the whale population is growing, its thriving! We need to base regulations on facts and not emotions. Commercial crabbing is an extremely sustainable industry providing healthy wild protein for people all over the world and that needs to be protected!
2/16/26 8:03:27	Trevor	Burningham	Ex-fisherman	This insane and over the top non-sense. I understand but the self deploying pots are more subject to failure. You will be hurting our costal economy lively hood and families. If people are concerned about whales they need to stop supporting using cargo ships to transport goods. How many cargo ships kill whales every year and ho unheard of .... There are some many rules we already have to follow to comply with state and federal regulations. Please re think this and dont make an irrational choice which will devastate thousand of people. Most of these fisherman give back to the community with large donations that support local youth sport and many other great organizations .
2/16/26 8:08:21	Amber Taunton	Altaunton@gmail.com	Commercial Fishing family	We care about crabbing and whales. Please slow this process down and listen to the families
2/16/26 8:42:01	Kari Budge	Kbudge3@gmail.com	General public	ODFW please do not replace evidence-based scientific practices already in place that work with "feel good" nonsense that will ultimately affect all families in Oregon through the economic impact these policy changes would inevitably cause.
2/16/26 8:44:33	Brad	Beaverking64@gmail.com	Commissioner	Please do not vote this in. Being a deckhand of 13 years and wanting to purchase a crab boat this would put the grasps of owning my own boat out of reach.
2/16/26 8:51:01	Scott edson	Scottjamesedson@gmail.com	California commercial fisherman	If Oregon follows Californias model of crab fishing with limited time limited gear and dangerous pop up devices it will devastate the fleet and all that depend on it. California coastal communities that used to thrive on crab fishing have turned in to ghost towns, drug havens, and are rampant with crime. This will happen to Oregon as well if they following our model of crab fishing. Expect a sharp increase in violent, non violent, and drug crimes.
2/16/26 9:16:22	Kimberly Larkin	K.larkin2092@gmail.com	General public	I too support whale environment and crab fisheries. I believe Oregon already has a good program and balance of the two.
2/16/26 9:47:58	When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.	When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.	When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.	I encourage you and your colleagues to review the analyses commissioned by the Massachusetts Division of Marine Fisheries evaluating the feasibility and economic costs of on-demand gear use in New England lobster fisheries. Many of the lessons, unanswered questions, and socioeconomic considerations are applicable to this discussion. You can access the analyses at <a href="https://bit.ly/ropeless-economics-2">bit.ly/ropeless-economics-2</a>
2/16/26 10:37:21	Mary Tucker	graybeam@yahoo.com	General public	Once again, here i am , a 49 year Oregon resident and I am having to write a testimony to stand up for one of Oregons top industrys because someone feels the need to not look at the whole picture and make changes that will dramatically impact our crab fleet. This industry is highly regulated as it is, just like our natural resources in this state and if you look at what's already been done , its working. I dont understand why out of state non profits that make their living off of conservation and who have no idea what is really going on in the sea can sway our elected politicians to make changes that will shut this industry down and cost Oregon not only revenue but the men and woman who sacrifice there lives for this occupation their jobs and livelihood. Please step back and look at the real data and picture. Stop over regulating that can ultimately cause closing of even more industry in this state.
2/16/26 10:56:10	Debra Byrd	Bde294@aol.com	General public	It's time to get real! To even think about this plan is a tragic shame! All it does is ruin lives and businesses of people who live and work in our communities. I am AGAINST the passage and implementation of this harmful, ideological, idiotic plan! Listen to those who ACTUALLY KNOW ABOUT THE REALITY!
2/16/26 10:50:30	Jody Daub	murfydink@yahoo.com	general public	Do not restrict the crab industry any further, as being from the West Coast, going to buy property on the Dungeness river, having a son who was a crab fisherman, and missing out on good crab meat here in Idaho and wishing for a better supply. We do not want the Dungeness industry eliminated or regulated, any more.
2/16/26 11:13:16	Tasha Dattilo	Tah_roxie@yahoo.com	General public	My families lives depend on this industry that has been around for generations. Please do not take it away as so many lives would be ruined.
2/16/26 11:28:06	Chris Davis	chrisdavis@gmail.com	Charleston Resident	I do not support this petition

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/16/26 11:34:09	Kristina Pankey	kspankey@yahoo.com	Family of fisherman	<p>I respectfully urge you to deny the current petition seeking sweeping, permanent changes to Oregon's Dungeness crab fishery.</p> <p>I strongly support whale conservation and believe protecting marine mammals must remain a priority. However, I also believe policy decisions should be grounded in the best available science and tailored to Oregon's specific circumstances. These goals are not mutually exclusive.</p> <p>West Coast humpback whale populations have shown long-term recovery trends, and federal stock assessments have documented growth in several distinct population segments. In 2022, NOAA denied a similar petition, citing evidence that whale populations were stable or increasing and that existing management measures were not impeding recovery.</p> <p>Oregon has already implemented substantial protective measures, including pot reductions, depth restrictions, gear marking requirements, derelict gear retrieval programs, and adaptive in-season management. The state is actively developing a comprehensive Conservation Plan and pursuing a federal Incidental Take Permit to ensure long-term compliance and whale protection.</p> <p>The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery. It sustains fishing families, processors, small businesses, and entire coastal communities. Abrupt, rigid mandates adopted through petition—rather than through Oregon's established science-based and adaptive management process—could destabilize those communities without demonstrable conservation benefit.</p> <p>This is not a choice between whales and working waterfronts. It is a choice between adaptive, evidence-based management and permanent mandates that may not reflect Oregon-specific data or current recovery trends.</p> <p>Please allow Oregon's existing science-driven process to continue and deny this petition.</p> <p>Thank you for your time and service.</p>
2/16/26 11:31:21	Brian Ansley	fishin_fool61@yahoo.com	Concerned citizen	<p>I am strictly OPPOSED to any rigid state regulation that affects the livelihoods of so many Oregonians. There is enough science provided by NOAA and federal agencies to determine what crabbing/fishing regulations should be. There is no need for any further restrictions to an already stable and sustainable fishery. This is nothing more than state government overreach in this industry, along with just about every other industry in this state. There is nothing about this change that is beneficial to anyone or any animal. It is based more off "feelings and emotions" than science. SCIENCE and DATA are the only 2 things that need to determine regulations and I vehemently oppose anything that tries to change that.</p>
2/16/26 11:37:32	Dawna Kennedy	Dawnak@comcast.net	General public, recreational crabbing and fishing	<p>We respect the whales and care deeply about maintaining balance between marine wildlife and our seafood industry. We have family members who have been in the fishing industry for many years, and feel there is no need for more and more restrictions to their livelihood, as long as the current laws are being followed.</p>
2/16/26 11:44:56	Vanessa Keys	vkeys89@gmail.com	General public	<p>There is no reason to revise Oregon fisheries</p>
2/16/26 11:51:57	Gerald Bates	Jbates@peak.org	Former processor/fisherman for over 60 years	<p>Our Dungeness fishery is over 100 years old. Our crab stocks remain sustainable and it is an economic lifeline to thousands of families, workers, local businesses and fishermen.</p> <p>The whale population has been strongly increasing and is in by no means, threatened in any meaningful manner.</p> <p>Far more die from natural causes, predation by Killer Whales and ship strikes than the rare crab line entanglement. This issue presented is comparable to protecting Mice because of their cute whiskers.</p> <p>This whole issue is purely emotionally charged, lacks scientific founding and is pursued by greedy pseudo environmental groups hoping to win huge financial gains.</p> <p>The general public needs to be truly informed by ODFW and NMFS as to the population growth, how healthy the whale stocks are and the huge importance of the Dungeness is to the Coastal and State economy.</p> <p>The emotional outbursts by so many uninformed need ready, visible points of information to explain all of the above.</p> <p>Thank You Gerald ( Jerry) Bates Siletz, Or</p>
2/16/26 12:08:12	Lisa Esch	Toreysmyride@gmail.com	General Public , Friends of Fisherman !	<p>I Believe this Bill would Devestate the Fishing Industry, and our small communities. Not only the Fishing community ,but as a whole in general financially !</p>
2/16/26 13:11:52	M. Phillips	Camaromike1975@gmail.com	General public	<p>Whale populations have been increasing in recent years with crab buoys still floating. Where commercial pots are set in shallow waters. If caught in buoys lines it because the currents drug the pot into deep waters!! WE DO NOT NEED TO CHANGE THE RULES!!</p>
2/16/26 13:18:48	Deborah Ann Howard	Glendalegal65@gmail.com	General public	<p>Leave well enough alone. Taking away the livelihood of hard working people is not the solution. This industry has built all of the coast and inland communities. It would cripple families, businesses and communities. Getting less politics involved and more working folks input should matter. We PAY the taxes!!</p>

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/16/26 13:45:29	Amber Smith	swtthang123@gmail.com	General public	<p>My name is Amber Smith, and I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery.</p> <p>I care deeply about whale conservation and about the coastal communities whose livelihoods depend on a stable, responsibly managed crab season. Those priorities are not mutually exclusive, and Oregon has been working to address both through science-based, adaptive management.</p> <p>This petition proposes rigid, permanent mandates through the petition process at a time when Oregon is already engaged in active risk-reduction efforts and ongoing federal coordination.</p> <p>In 2022, the National Marine Fisheries Service denied a similar petition advancing comparable arguments about West Coast whale impacts and mandatory regulatory triggers. After reviewing the best available science, NOAA concluded that whale populations were stable or increasing, that existing measures were not impeding recovery, and that the requested actions were not necessary or appropriate at that time. That precedent is instructive.</p> <p>ODFW and the Commission are already implementing pot reductions, depth restrictions, gear-marking requirements, derelict gear programs, and in-season adaptive measures. The Department is also advancing an experimental framework for pop-up gear and continuing work on Oregon's Conservation Plan and pursuit of a federal Incidental Take Permit. Completing Oregon's Conservation Plan for the commercial Dungeness crab fishery and moving through the federal Incidental Take Permit process is the responsible path toward long-term compliance and sustainable conservation.</p> <p>The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports vessels, processors, and coastal families statewide. The petition's proposals would eliminate significant fishing opportunity and impose substantial costs without a credible economic analysis or resolution of safety and enforcement concerns. Policies that fundamentally reshape a fishery should be grounded in Oregon-specific data and operational feasibility.</p> <p>Oregon's strength has been its ability to respond to changing ocean conditions in real time. Preserving that adaptive management framework is critical.</p> <p>For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's ongoing, science-based processes to move forward.</p> <p>Thank you for your time and consideration of this impactful issue.</p>
2/16/26 13:43:52	Anna Capri	Anna.c.capri@gmail.com	General public, previous owner in Oregon Dungeness	<p>I respectfully urge regulators to consider a voluntary permit buyback program as an alternative to across-the-board pot reductions. If the goal is to reduce whale entanglement risk, the most effective approach is to permanently reduce the number of vessels operating in the fishery. Fewer vessels means fewer total pots and, most importantly, fewer vertical lines in the water column — directly lowering entanglement risk.</p> <p>A buyback program administered by the Oregon Department of Fish and Wildlife would reduce overall gear while preserving economic viability for the remaining operators. Rather than spreading financial strain across the entire fleet, this approach provides a structural solution that supports whale conservation, safety, and long-term fishery sustainability.</p>
2/16/26 13:25:08	Roy Pitts	fairlyhonestroy@yahoo.com	general public, registered voter	Deny this petition and allow Oregon's current science-based process to continue. Dungeness crab fishery and whale conservation are not in conflict. At Risk are families, processors, small businesses, the entire coastal communities.
2/16/26 13:51:21	Abel	bill4reak@gmail.com	Commercial fishermen	Please stop the petition for Oregon crabbers
2/16/26 13:58:58	Janice Langlinais	janice@VisitOAC.com	Visitor & Convention Bureau	<p>Chair Mary Wahl, Vice-Chair Becky Hatfield-Hyde, and members of the Oregon Fish and Wildlife Commission:</p> <p>As the Executive Director of the Coos Bay-North Bend-Charleston Visitor and Convention Bureau, I am urging you to deny the modifications proposed for the commercial Dungeness crab fishery regulations. This is a vital industry to the Oregon Coast, and particularly my community.</p> <p>Fishers and processors aren't the only ones who benefit from this industry. Fresh, local seafood is one of the top reasons that visitors come to the Oregon Coast. Demand for crab will continue to be strong. We don't need or want more crab from other regions shipped in to be served in our restaurants. That's where these regulations will lead us.</p> <p>Our rural coastal communities' industries are all intertwined. A hit to the crab industry of this magnitude will create economic issues in each of our coastal communities. As coastal communities, we are already working hard to grow our economies so that future generations will be able to work, live, and play where they grew up. We also want to keep the coast as a wonderful place to visit and live year-round. Destroying one of our key industries and value propositions is in direct conflict with that work.</p> <p>Join us in opposing this petition. Let's keep our crabbers, processors, seafood markets, restaurants, and communities on the coast thriving.</p> <p>Sincerely, Janice Langlinais Executive Director Coos Bay-North Bend-Charleston Visitor &amp; Convention Bureau Oregon's Adventure Coast www.OregonsAdventureCoast.com 541-297-2432</p>
2/16/26 14:06:40	Judie Stringfield	jstringfield45@yahoo.com	General Public	Son and son in law both work fishing industry
2/16/26 14:04:01	andrew andersen	andrewandersen3@gmail.com	Commercial fisherman	I personally could write you a story on the impact of the numerous additional regulation history to the industry that I support my family with but it would be too long. I know their will always be more regulation in every aspect of employment in the future but commercial fishing has always been two sided where the fishermen take short end of the stick with little to no say on the situation. Please take time to think of families such as mine who have been making a living doing the toughest and most dangerous occupation for many generations when looking over new regulations. We love the fishery and ecosystem more than anyone else because our families rely on it for survival. Please don't add more inconvenient laws and regulations that limit our ability to share fresh Wild seafood with the rest of the world. Thank you.
2/16/26 14:09:39	Patrick Larson	3900 NW Cherokee Lane Newport OR 97365	General Public	I know many Fishermen (one is my neighbor) and rely on Oregon's fishery for their livelihood. Please keep the existing regulations and do NOT add any more regulations that impede our fishing industry.
2/16/26 14:18:27	Chester Hyde	7576hyde@gmail.com	General public	We have a whale population that is doing very well. We lose very few whales to crabs pots. I'm more worried about these new pots not working and creating a disaster on the bottom of the ocean floor. Please don't allow this to happen. Chester Hyde.
2/16/26 14:11:05	Celia Stockton	mcclie1952@gmail.com	General Public	The Petition MUST BE DENIED.....The present regulations ARE ENOUGH. The Coastal communities ECONOMY DEPEND on the Crabbing Industry TO SUSTAIN them and the families. The truth is the Whale Population has NOT DWINDLED, BUT RATHER HAS GROWN. Whales DON'T EAT CRAB, AND CRAB FISHERMAN DO NOT CATCH WHALES, NOR do they POSE A DANGER to the whales. The Petition is SIMPLY NOT BASED on NEW Scientific FINDINGS, but rather zero evidence. The Crabbing Industry ALREADY has ENOUGH REGULATIONS. If that Petition is granted...IT WILL DEVASTATE OREGON'S Crabbing Industry, THE FAMILIES WHO DEPEND ON IT AND ENTIRE COMMUNITIES! ENOUGH OVER REGULATION that destroys AMERICAN FAMILIES way of life. I have family there WHO depend on the Crabbing Industry for SUPPORTING their families. I'm asking you to DENY THE PETITION. THANK YOU FOR YOUR TIME. Sincerely, Celia Stockton 509- 949-4488
2/16/26 14:30:37	Kristin Hyde	Tkhyde@gmail.com	Public	This is too expensive for the commercial crabbers as this cost will be pushed down to the consumer. Crab is already expensive for the consumer and will result in less sales. The general public is already struggling with day to day expenses of life.
2/16/26 11:33:51	Samuel Watson	SWatson1121@outlook.com	Boat Deckhand	These rules will destroy the lives of many fisherpeople of the Oregon coast the idea behind it makes sense but needs to be thought out more so it wont ruin the family's of the ones who keep this state running and alive.

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/16/26 14:35:43	Jeri Watson	jiparret70@gmail.com	Boat owner	Stop screwing the Oregon crabbers. You will be causing them to lose their homes and not be able to feed their families. The State of Oregon can not afford to retrain these fishermen when they no longer own their boats. Maybe these crabbers can camp out on your doorsteps when they are homeless. I support the Oregon Crabbing Fleets.
2/16/26 14:41:11	Todd Watson	fveisurelee2@gmail.com	Commercial Fishing Vessel Owner	I believe that this petition is being driven by emotions and not sound science. Nobody wants to see an entangled whale, especially commercial fisherman. Not only is this poor PR, which leads to petitions like this, but commercial fisherman love the sea and all that is in it. We take being stewards of the sea and its resources very seriously. Our lives, families, and communities depend upon its health and vitality. I know that you will have received numerous letters listing facts and numbers.....etc, so I will spare you all of that in this communication. I feel when emotions run high it is imperative that extreme caution be taken to not over react and place unjustified burdens on an industry that already takes the health and vitality of the ocean and ALL of its inhabitants extremely seriously and as a matter of the utmost importance. Thank you for your careful consideration of this important matter.
2/16/26 14:27:58	Carlotta Hall	Carlohall@msn.com	Legal Citizen of Oregon	It appears there is a current studies that support an increased population of these whales of concern. It's time that logic, surveys and science be applied. The commercial fishing harvests are currently being managed and provide for best practices and renewable sustained yields, similar to the timber industry. Additionally, by implementing this Petition, it would destroy the economic contribution to the local fishing communities which not only affect family's survival but it also provides for fishery earnings to be spent on goods, federal & state taxes, broad research, marine management & much more.  Oregon is earning a reputation on a national level where it is no longer respected because of the extremists groups, such as PEDAs and their self-serving agenda & over-reaching goals. As a hard working tax payer all my life, I ask that this Petition be denied.
2/16/26 15:20:28	Romolo R Ghio	47 Havenview Ln Oceanside, CA 92056	Commercial fisher	Put pingers on bouy line with only one bouy and less slack in scope !
2/16/26 15:15:20	Jason Prophet	ke7cwg@gmail.com	sportsmen ex salmon troll boat	strongly opposed to any changes in the commercial crab rules.laws this will push working families out of business .the only way too make this work is for ODFW to COVER full cost of pop up gear and maintenance for 3 yrs
2/16/26 15:25:02	Philip Spulnik	phils@casco.net	fisherman	We do not need additional restrictions on our crab fishery. Whales populations are stable or increasing according to NOAA. this is plainly not a science based rule you are making. You are cowering to the PETA people. This is just plain stupid!!! I have lived in Waldport for the past 60 years and fished and crabbed all of those years. Save our fisheries and oust these pseudo-scientists!
2/16/26 14:55:43	Richard Lilienthal	nelrondic@yahoo.com	owner and operator of f/v nelrondic	I am the 4th of 6 generations of full-time crab fisherman that work out of coos bay. My family started crabbing out of coos bay in 1912. We have fished crab every season and as much as 90% of our income comes from the crab fisheries. The spring runs of crab have been huge to us and at times have saved our season financially. The 20% of gear reduction is already hard on us the 1st of May and now April 1st but a 40%reduction would kill us financially. I don't crab outside of 40 fathoms and have never seen a humpback whale around my crab gear so I don't understand why the crabbers that fish shallow water should take that kind of hit. I have served on the ODCC for 20 years, crab permit review board, whale entanglement committee and I think there are things the crab fleet can do to cut down on whale entanglements but not this drastic proposal. Richard Lilienthal
2/16/26 15:51:47	Morgen Crawford	204 Racine St., Rapid city, SD 57701	general public	My Nephew captains a boat in Oregon's commercial fishing. He's successful and VERY careful to protect all whales! Dungeness crab fishery is Oregon's most valuable single-species commercial fishery. It supports families, processors, small businesses, the entire coastal community and impacts state revenue. Do not allow the petition to move forward! Protect our fishing families, please.
2/16/26 16:29:38	Scott Mason	Scott@bridaxc.com	Retired fisherman	More restrictions on fisherman seems to always be the go to for ODFW. Why must they always suffer?
2/16/26 16:45:31	Stephnie Schmidt	Stephnieanna@yahoo.com	Affiliation	Let's love these boys keep fishing so they can feed their families
2/16/26 16:49:20	David D Hunter	ddhunterarborist@aol.com	general public	Deny the petition please. Thank you. Crabbers and local folks have been working on solutions for years. Deny this petition please.
2/16/26 17:00:37	Natalie Lane	tropicalreptile@gmail.com	Concerned Oregon Resident	The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery. It supports deckhands, processors, small businesses, and entire coastal communities. It supports state and local revenue, including funding that flows to schools and public services. Please deny this petition and allow Oregon's current science-based process to continue. Thank you.
2/16/26 17:32:11	JACK SCOTT	SUVEYMAN24@AOL.COM	GENERAL PUBLIC	I OPPOSE THE REVIEW OF PETITION TO REVISE COMMERCIAL CRABBING IN OREGON. IF IT AINT ONE THING ITS ANOTHER, JUST STOP. THE OTHER THING THEY ARE TRYING TO DOUE TO US IS STOP HUNTING AND FISHING ALLTOGETHER! ENOUGH IS ENOUGH. STOP WITH THE OVER REGULATIONS AND LET A MAN BE. YOU ARE GONG TO TURN ALL US "GOOD" MEN INTO CRIMINALS, BECAUSE WE JUST WONT HAVE IT! YOU SIT IDLE AND WATCH THEM DRAG THE OCEAN DEAD CLEAN FROM TRAWLING, YET YOU WANT TO STOP AND KILL AND ENTIRE INDUSTRY OF CRABBING HERE IN OREGON. ITS SAD TO SEE WHAT YOU ARE DOING AND HARD TO BELIEVE YOUR KIND OF PEOPLE HAVE BEEN ALLOWED TO GET INTO POSITIONS OF POWER TO BE ABLE TO DESTROY NORMAL. JUST STOP!
2/16/26 18:15:18	Gerry Hembree	160 sw range dr. Waldport Oregon	General Public	I think there are far to many restrictions on fisherman already. There is no need to strangle them more with revised and harsher restrictions. This county thrives on its fishing and crabbing and far to many families will be affected if they put more rules into place. There are far greater risks to whales and there populations, like plastic waste and pollution being dumped into the ocean. Maybe focus on fixing that problem before strangling the families that keep this community going
2/16/26 18:23:38	Erin	Ekjohns32@gmail.com	Yes	My son uncle
2/16/26 18:45:16	Sue Keesee	Smkeesee@icloud.com	General public	As a life long resident of Newport, please leave the Dungeness Crab fishing regulations as is. This fishery is vital to the community. Thank you.
2/16/26 18:46:16	Barbara Nelson	dalebarbn@hotmail.com	General Public	I reject the petition. Oregon fishermen don't need mandatory rules and restrictions.
2/16/26 19:31:14	Amy Parker	Parkeraae@gmail.com	General public	This is a drastic measure and will deeply impact our fishing communities
2/16/26 20:22:49	Tracie Costa	Tlc2006ca@gmail.com	General Public	I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery. I care deeply about whale conservation and about the coastal communities whose livelihoods depend on a stable, responsibly managed crab season. Those priorities are not mutually exclusive, and Oregon has been working to address both through science-based, adaptive management. This petition proposes rigid, permanent mandates through the petition process at a time when Oregon is already engaged in active risk-reduction efforts and ongoing federal coordination. In 2022, the National Marine Fisheries Service denied a similar petition advancing comparable arguments about West Coast whale impacts and mandatory regulatory triggers. After reviewing the best available science, NOAA concluded that whale populations were stable or increasing, that existing measures were not impeding recovery, and that the requested actions were not necessary or appropriate at that time. That precedent is instructive. ODFW and the Commission are already implementing pot reductions, depth restrictions, gear-marking requirements, derelict gear programs, and in-season adaptive measures. The Department is also advancing an experimental framework for pop-up gear and continuing work on Oregon's Conservation Plan and pursuit of a federal Incidental Take Permit. Completing Oregon's Conservation Plan for the commercial Dungeness crab fishery and moving through the federal Incidental Take Permit process is the responsible path toward long-term compliance and sustainable conservation. The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports vessels, processors, and coastal families statewide. The petition's proposals would eliminate significant fishing opportunity and impose substantial costs without a credible economic analysis or resolution of safety and enforcement concerns. Policies that fundamentally reshape a fishery should be grounded in Oregon-specific data and operational feasibility. Oregon's strength has been its ability to respond to changing ocean conditions in real time. Preserving that adaptive management framework is critical. For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's ongoing, science-based processes to move forward. Thank you for your time and consideration of this impactful issue.

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/16/26 21:51:49	Jamie M Ramsey	jeramsey81@gmail.com	General Public	<p>My name is Jamie M. Ramsey, and I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery.</p> <p>I care deeply about whale conservation and about the coastal communities whose livelihoods depend on a stable, responsibly managed crab season. Those priorities are not mutually exclusive, and Oregon has been working to address both through science-based, adaptive management.</p> <p>This petition proposes rigid, permanent mandates through the petition process at a time when Oregon is already engaged in active risk-reduction efforts and ongoing federal coordination.</p> <p>In 2022, the National Marine Fisheries Service denied a similar petition advancing comparable arguments about West Coast whale impacts and mandatory regulatory triggers. After reviewing the best available science, NOAA concluded that whale populations were stable or increasing, that existing measures were not impeding recovery, and that the requested actions were not necessary or appropriate at that time. That precedent is instructive.</p> <p>ODFW and the Commission are already implementing pot reductions, depth restrictions, gear-marking requirements, derelict gear programs, and in-season adaptive measures. The Department is also advancing an experimental framework for pop-up gear and continuing work on Oregon's Conservation Plan and pursuit of a federal Incidental Take Permit. Completing Oregon's Conservation Plan for the commercial Dungeness crab fishery and moving through the federal Incidental Take Permit process is the responsible path toward long-term compliance and sustainable conservation.</p> <p>The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports vessels, processors, and coastal families statewide. The petition's proposals would eliminate significant fishing opportunity and impose substantial costs without a credible economic analysis or resolution of safety and enforcement concerns. Policies that fundamentally reshape a fishery should be grounded in Oregon-specific data and operational feasibility.</p> <p>Oregon's strength has been its ability to respond to changing ocean conditions in real time. Preserving that adaptive management framework is critical.</p> <p>For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's ongoing, science-based processes to move forward.</p> <p>Thank you for your time and consideration of this impactful issue.</p>
2/17/26 3:23:51	Christian	dixon.r.christian@gmail.com	General public	<p>As someone build a business for commercial fishing I wonder how this would affect my plans going forward.</p>
2/17/26 4:41:32	Tiffany Pankey	Smithbrosno2@gmail.com	Generally public, boat owner, commercial fisherman	<p>My name is Tiffany Pankey, and I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery.</p> <p>I am writing as both an Oregonian, co boat owner, a mother and a fisherman's wife. This fishery is not just an industry to us—it is how we support our family, stay connected to our coastal community, and carry forward a way of life that has been passed down through generations. The work is already uncertain, dangerous and demanding, and decisions that remove flexibility can have real impacts on families like mine.</p> <p>For small boat owners especially, additional rigid mandates could create serious financial fallout. Many of us operate on narrow margins, and reduced opportunity or costly gear changes can mean the difference between staying in business and having to leave the fishery altogether. These are not just economic impacts, they affect families, local processors, and the fabric of working waterfront communities.</p> <p>I care deeply about whale conservation and believe it can and should be addressed alongside a stable, responsibly managed crab season. Oregon is already taking meaningful, science-based steps to reduce risk through measures like pot reductions, gear marking, depth restrictions, derelict gear programs, and adaptive in-season management.</p> <p>A similar petition was denied by federal regulators in 2022 after review of the best available science. Oregon is continuing to move forward with its Conservation Plan and federal Incidental Take Permit process, which is the appropriate path for long-term protection and compliance.</p> <p>The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports working families, small businesses, and coastal economies. Major changes to this fishery should be based on Oregon-specific science and practical realities on the water.</p> <p>For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's existing, science-based management to continue.</p> <p>Thank you for your time and consideration.</p>
2/17/26 4:53:46	Brett Pankey	Brettlepankey1@gmail.com	Boat owner and operator	<p>Writing</p> <p>My name is Brett Pankey, and I am an Oregon commercial fisherman, boat owner, crab permit lease holder, and captain. I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery.</p> <p>I make my living on the water. This is not theoretical for me, it is how I provide for my family, pay my crew, maintain my vessel, and stay part of Oregon's working waterfront. Every season already carries risk from weather, ocean conditions, fuel costs, and market fluctuations.</p> <p>We plan, invest, and work long hours to manage those uncertainties.</p> <p>The additional rigid requirements proposed in this petition could create serious financial consequences for small, owner-operated boats like mine. Many of us run on tight margins. Expensive gear changes, reduced fishing opportunity, or mandates that don't match real-time ocean conditions could make it impossible to stay viable.</p> <p>These decisions don't just affect individual fishermen, they ripple through deckhands, processors, local businesses, and entire coastal communities.</p> <p>I care about whale conservation. Fishermen are on the ocean every day, and we have a strong interest in protecting the resource we depend on. Oregon is already implementing practical, science-based measures such as pot reductions, gear marking, depth management, derelict gear removal, and adaptive in-season tools. These approaches allow us to reduce risk while still operating safely and responsibly.</p> <p>Oregon's adaptive management framework works because it can respond to changing conditions. Replacing that flexibility with permanent, one-size-fits-all mandates would create safety, enforcement, and economic challenges without clear evidence that they are necessary.</p> <p>The Dungeness crab fishery is the backbone of many small coastal operations like mine. Major changes should be based on Oregon-specific science, real operational knowledge, and collaboration with the fishermen who are directly affected.</p> <p>For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's current, science-based process to continue.</p> <p>Thank you for your time and consideration.</p>

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/17/26 5:42:39	John Kubik	jckubik@hotmail.com	General Public	Please deny this petition! The existing science is sufficient! The 2025/2026 harvest numbers should prove the health of the fishery! Thank You. John Kubik
2/17/26 6:29:24	Jacen Jespersen	jacenj@hotmail.com	general public	Please don't change the rules, we are already regulated enough.
2/17/26 6:26:28	Gretchen Allen	motomom675@gmail.com	General Public	I am a former commercial fisherman. I have watched these additional restrictions be placed on the industry that make it harder for fishermen to make a profit in a very capital intensive industry. It concerns me for the future of the industry. The additional restrictions add cost and risk, but do not actually accomplish the goal the were meant to. This current bill is unnecessary and will have negative consequences for the industry that will make it harder for the families that rely on this industry to survive. The fishermen I know are good stewards of our oceans and the affects they have on other species they make affect as a by product of their operations. They already implement safe practices to avoid affecting other species such as whales. This bill does not help the industry or the whales it just makes it harder and more expensive for the fisherman!
2/17/26 7:29:43	alaska	alaskasylak82@gmail.com	public	My name is Alaska Sylak, and I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery. I care deeply about whale conservation and about the coastal communities whose livelihoods depend on a stable, responsibly managed crab season. Those priorities are not mutually exclusive, and Oregon has been working to address both through science-based, adaptive management. This petition proposes rigid, permanent mandates through the petition process at a time when Oregon is already engaged in active risk-reduction efforts and ongoing federal coordination. In 2022, the National Marine Fisheries Service denied a similar petition advancing comparable arguments about West Coast whale impacts and mandatory regulatory triggers. After reviewing the best available science, NOAA concluded that whale populations were stable or increasing, that existing measures were not impeding recovery, and that the requested actions were not necessary or appropriate at that time. That precedent is instructive. ODFW and the Commission are already implementing pot reductions, depth restrictions, gear-marking requirements, derelict gear programs, and in-season adaptive measures. The Department is also advancing an experimental framework for pop-up gear and continuing work on Oregon's Conservation Plan and pursuit of a federal Incidental Take Permit. Completing Oregon's Conservation Plan for the commercial Dungeness crab fishery and moving through the federal Incidental Take Permit process is the responsible path toward long-term compliance and sustainable conservation. The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports vessels, processors, and coastal families statewide. The petition's proposals would eliminate significant fishing opportunity and impose substantial costs without a credible economic analysis or resolution of safety and enforcement concerns. Policies that fundamentally reshape a fishery should be grounded in Oregon-specific data and operational feasibility. Oregon's strength has been its ability to respond to changing ocean conditions in real time. Preserving that adaptive management framework is critical. For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's ongoing, science-based processes to move forward. Thank you for your time and consideration of this impactful issue.
2/17/26 8:01:54	Frances White	whitef318@gmail.com	general public	vote no
2/17/26 8:44:26	Libby Leonnig	libbyleelen@yahoo.com	General public	My name is Libby Leonnig, and I respectfully urge the Commission to deny the December 2025 petition seeking sweeping amendments to OAR Chapter 635, Division 5 governing the Oregon commercial Dungeness crab fishery. I care deeply about whale conservation and about the coastal communities whose livelihoods depend on a stable, responsibly managed crab season. Those priorities are not mutually exclusive, and Oregon has been working to address both through science-based, adaptive management. This petition proposes rigid, permanent mandates through the petition process at a time when Oregon is already engaged in active risk-reduction efforts and ongoing federal coordination. In 2022, the National Marine Fisheries Service denied a similar petition advancing comparable arguments about West Coast whale impacts and mandatory regulatory triggers. After reviewing the best available science, NOAA concluded that whale populations were stable or increasing, that existing measures were not impeding recovery, and that the requested actions were not necessary or appropriate at that time. That precedent is instructive. ODFW and the Commission are already implementing pot reductions, depth restrictions, gear-marking requirements, derelict gear programs, and in-season adaptive measures. The Department is also advancing an experimental framework for pop-up gear and continuing work on Oregon's Conservation Plan and pursuit of a federal Incidental Take Permit. Completing Oregon's Conservation Plan for the commercial Dungeness crab fishery and moving through the federal Incidental Take Permit process is the responsible path toward long-term compliance and sustainable conservation. The Dungeness crab fishery is Oregon's most valuable single-species commercial fishery and supports vessels, processors, and coastal families statewide. The petition's proposals would eliminate significant fishing opportunity and impose substantial costs without a credible economic analysis or resolution of safety and enforcement concerns. Policies that fundamentally reshape a fishery should be grounded in Oregon-specific data and operational feasibility. Oregon's strength has been its ability to respond to changing ocean conditions in real time. Preserving that adaptive management framework is critical. For these reasons, I respectfully ask the Commission to deny the December 2025 petition and allow Oregon's ongoing, science-based processes to move forward. Thank you for your time and consideration of this impactful issue.
2/17/26 8:52:03	Susannah Montague	susannahmontague@gmail.com	Oregon Commercial fishing vessel owner, general public	Please respectfully include commercial fisherfolk in your decision making process. After all- they are the ones actually out there on the ocean every day, all day. Their insights and experience may prove incredibly valuable. No one benefits more from a healthy ocean than fisherfolk.
2/17/26 8:54:35	Brad Parries	kauaibrad10@yahoo.com	Public	Please don't change a thing. If anything make them use some kind of simple markers on there lines so the whales can see and reroute there swim easier.
2/17/26 9:56:29	Gregory Va sickle	gmvansickle50@gmail.com	Public	No to this petion
2/17/26 10:25:57	Laurie Warhurst	llwarhurst@gmail.com	Toledo OR resident (general public)	The Dungeness crab fishery is vital to our local commercial fishery. It supports deckhands, processors, small businesses, and entire coastal communities. It supports state and local revenue, including funding that flows to schools and public services.  Please deny this petition and allow Oregon's current science-based process to continue.
2/17/26 10:34:44	Paul Warhurst	warhorse.pw@gmail.com	general public	The Dungeness crab fishery is vital to our local commercial fishery. It supports deckhands, processors, small businesses, and entire coastal communities. It supports state and local revenue, including funding that flows to schools and public services.
2/17/26 10:40:03	Carol	Carolsstitchingstudio@gmail.com	General public	Please vote NO on more restrictions to our Oregon Crab fisheries. There are already laws in place to protect whales . Please support our local crab fisheries , an important piece of the Oregon Coast economy!

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/17/26 10:33:13	Kelsey Bozeman	kelseybozeman@gmail.com	Elected Port Commissioner, Port of Brookings Harbor, Private Citizen & Commercial Permit Holder	<p>My name is Kelsey Bozeman. I am a Brookings resident and Port Commissioner, writing as a private citizen. I urge the Commission to deny this petition as written.</p> <p>A Fisherman I Know: He grew up on this coast. His father fished before him. He borrowed against his future, built a small business, employs local crew, and feeds this community with fresh seafood. He takes his children on that boat and teaches them to respect the ocean. He pulls derelict gear that isn't his. He has watched whale populations grow and he is glad for it.</p> <p>His business depends on the late season, April through August. His crew, the fuel dock, the seafood market, the restaurant, and the tourist who drove the coast to eat Oregon crab all feel it when his boat is working. When the boats stop, the visitors stop too.</p> <p>This petition dismantles everything he has built.</p> <p>What This Petition Does: Moving restrictions from May 1 to April 1 eliminates a full month of fishing with no transition and no economic analysis. That ripples to the seafood market, the restaurant, and the tourist who arrives to find the docks restricted.</p> <p>Cutting his gear by 40% is a breaking point for a family operation carrying vessel debt, crew payroll, and fuel costs. When required by law to identify options that reduce business harm, the petitioners answered: "There are no alternative options."</p> <p>By 2028, all conventional gear would be banned and replaced by pop-up gear Oregon has never authorized or tested. Converting could cost \$360,000 to over \$1 million. If he can't make that investment, he leaves.</p> <p>A single entanglement in gear attributed to Oregon, including gear found on whales off Baja California, would trigger automatic statewide closures with no appeal.</p> <p>These Are Not Local Voices: The Center for Biological Diversity operates from Tucson on \$34 million per year. Oceana was founded by Pew and Rockefeller on \$49 million annually. NRDC holds \$182 million in assets. Not one has an office in Brookings.</p> <p>This is a regulatory campaign by national organizations with no stake in this community. The ESA violation language is the predicate for a lawsuit if you don't comply.</p> <p>This Contradicts State Priorities: Governor Kotek has made protecting Oregon's small business economy a priority. There is no more vulnerable small business than a family fishing operation on the southern Oregon coast. These are families carrying debt, employing neighbors, and sustaining the fuel dock, processor, seafood market, restaurant, and tourism industry.</p> <p>Brookings cannot absorb this shock. Commercial fishing is our foundation.</p> <p>The Science Doesn't Justify It: The petition admits these measures are "unlikely to reduce entanglements to a level that would promote humpback whale recovery." These rules may cost this family everything and still fail.</p> <p>Oregon's fleet has been partnering with OSU on 42,000 miles of ocean surveys. That collaborative process is being bypassed.</p> <p>What I'm Asking: Deny this petition. Require a full economic impact assessment. Protect the industry collaboration. Require Oregon pilot testing before any mandate. Ensure closure triggers are proportionate.</p> <p>Oregon can protect whales and fishing families. These aren't opposing goals unless we let outside organizations define them that way.</p> <p>The fisherman I described is real. His debt is real. His children are real. He deserves a seat at this table.</p>
2/17/26 10:51:00	John Culp	jayysee2025@gmail.com	General Public	Please review to ensure our local commercial fishing industries are looked after and provide a future industry for the next generation
2/17/26 11:04:04	Robert Hampton	NFG.fisheries@gmail.com	Commercial boat owner and hired captain in Oregon since 2015	<p>I am strongly against any more attempts to hold off the environmental ngos by continuing to modify and restrict the Dungeness crab fishery. There is no evidence of a problem that needs to be fixed and the issues that the state tries to convince us need to be fixed are consistently exaggerated and based off fear of a lawsuit instead of scientific evidence. Too much emotion involved and not enough reality. During a whale entanglement meeting held in coos bay a few years ago, Kari actually put up whale interaction numbers for the years surrounding the modified season which included depth restrictions and pot reductions. Her numbers showed that we had fewer interactions before the state forced the changes and she actually told me that you can't look at the numbers that way. Because we've had more interactions since the changes, we actually need to make more restrictions. The absurdity of her statement and the inability to consider that the problem isn't real just goes to show how little reality means when it comes to this issue. Leave the crab season alone. Remove the existing pot reductions and depth limitations and whales will continue to grow and reproduce while we continue to make a living side by side with them. The whale population grew with the previous rules in place, why mess with something that was working. Another fun fact is that I've yet to see any proof of a sea turtle entangled yet for some reason they are being lumped in with whales. Let's deal with real problems, not make believe issues because they tug at the heartstrings.</p>
2/17/26 11:42:03	James Walker	walker.jim@live.com	General Public	I oppose these regulations. Removing vertical lines does not eliminate risk, it shifts it. Electronics fail, increasing ghost fish and littering the ocean floor. Cost increase causing irreparable damage to livelihood of 10's of thousands of people and their communities related to the crabbing industry. Oregon already implements seasonal closures to minimize the risk of whale entanglement.
2/17/26 11:55:08	Eric	Sheep1@frontier.com	General public	I oppose new regulations

Start time	Name2	Email Address	Affiliation or type of s	Comments
2/17/26 13:03:27	Scott Fosmark	yaznak77@gmail.com	Vessel Owner and commercial fishermen - Multiple Vessels	<p>My name is Scott Fosmark, owner of Fosmark Fisheries LLC, and a fifth-generation commercial fisherman operating two Oregon Dungeness crab vessels, the FV Yaznak and the FV Queen Corinne.</p> <p>My family has fished commercially for five generations. I have invested my life savings into this business. Fosmark Fisheries LLC specializes in providing Americans with fresh, live Oregon Dungeness crab — a premium, domestically harvested seafood product that supports coastal communities and domestic food supply.</p> <p>I respectfully oppose the petition submitted to the Oregon Department of Fish and Wildlife by the Center for Biological Diversity, Oceana, Natural Resources Defense Council, and the American Cetacean Society.</p> <p>While whale conservation is a goal we all share, the measures proposed in this petition are economically destabilizing, structurally extreme, and scientifically incomplete.</p> <p>The Commission must consider the documented growth in West Coast whale populations over the past decade. As whale abundance increases and seasonal presence expands in Oregon waters, the probability of interaction with fixed gear also increases — regardless of modest reductions in pot numbers. Risk analysis must incorporate whale density, migratory behavior, and long-term population trends, not solely pot counts.</p> <p>There has also been little meaningful discussion of acoustic deterrent devices (pingers). These technologies have been used in other fisheries to reduce marine mammal interactions. Before mandating sweeping closures and costly transitions to pop-up gear systems, the Commission should evaluate pinger trials specific to Oregon crab gear, comparative cost analysis, effectiveness in Oregon ocean conditions, and federal regulatory compatibility.</p> <p>The proposed regulations do not simply affect seasonal income — they directly threaten the long-term value of the assets we have invested in over decades. My vessels, permits, and gear represent my life savings investment. Their market value is directly tied to the ability to fish a full and stable season under predictable regulations. If late-season restrictions are advanced, depth reduced, gear allocations cut, and conventional gear eventually prohibited, earning capacity declines — and with it, vessel equity, permit value, and generational investment.</p>
2/17/26 13:34:24	James A. Letts	wallmeyeret_al@yahoo.com	Former Oregon fisherman and general public	<p>I would prefer that the already provided and established science showing the increase of humpback whale population be the primary precedent used to determine whether or not further restrictions are placed on our Oregon crab fisheries which will greatly affect their livelihood. Thank you for your serious consideration.</p>
2/17/26 15:01:51	George King	budk64@mail.com	Commercial Fishing Captain	<p>Dear Members of the Oregon Fish and Wildlife Commission,</p> <p>My name is George King. I am a professional commercial fishing captain with over 40 years of experience in the Dungeness crab fishery, and 100 percent of my income is derived from this industry. I respectfully oppose the petition proposing substantial regulatory changes to Oregon's commercial Dungeness crab fishery.</p> <p>After four decades on the water, I understand both the importance of conservation and the realities of commercial fishing. The proposed measures — including early seasonal closures, expanded depth restrictions, automatic shutdown triggers, and eventual elimination of conventional gear — would dramatically reduce opportunity and destabilize the fishery.</p> <p>We have seen what similar regulatory approaches have done to the California crab fleet. Ongoing closures, litigation pressure, and regulatory uncertainty have severely disrupted that fishery, reduced income stability, and damaged long-term asset value for fishermen.</p> <p>Oregon should not follow the same path.</p> <p>It is important that this Commission exercise independent judgment based on Oregon-specific science and balanced economic consideration. Outside advocacy organizations often pursue broader policy goals that may not fully account for the real-world impact on working fishermen and coastal communities.</p> <p>This fishery supports families, crews, processors, and local economies. Decisions of this magnitude must be proportionate, data-driven, and carefully evaluated for economic consequences.</p> <p>As a captain who depends entirely on this industry and has spent more than 40 years building a career in it, I urge the Commission to reject this petition in its current form and continue managing Oregon's Dungeness crab fishery through collaborative, science-based decision-making.</p> <p>Respectfully, George King Commercial Fishing Captain Oregon Dungeness Crab Fishery</p>
2/17/26 15:50:48	Joseph Abad	teamabad@yahoo.com	Commercial Fisherman	<p>Dear Members of the Oregon Fish and Wildlife Commission,</p> <p>My name is Joseph Abad. I am a professional commercial fishing captain with over 40 years of experience in the Dungeness crab fishery. One hundred percent of my income comes from this industry. I am writing to respectfully oppose the current petition seeking sweeping regulatory changes to Oregon's commercial Dungeness crab fishery.</p> <p>Throughout my career, I have seen regulatory changes implemented when supported by solid science and balanced analysis. What concerns me about this petition is not the goal of protecting whales — which we all support — but the scale and structure of the proposed measures.</p> <p>Provisions such as automatic closure triggers, accelerated late-season restrictions, and the eventual elimination of conventional gear would fundamentally restructure the fishery and jeopardize the ability of working captains like myself to earn a living.</p> <p>We have already witnessed the impact of similar regulatory pressure in California. Repeated emergency closures, litigation-driven mandates, and regulatory uncertainty have significantly destabilized the California crab industry. The result has been financial loss, permit devaluation, and long-term harm to fishing families and coastal communities.</p> <p>Oregon should learn from that experience rather than repeat it.</p> <p>It is also deeply concerning when outside national advocacy organizations apply pressure campaigns that influence state-level commissions. Regulatory bodies must represent the people and communities they serve — including the fishermen whose livelihoods depend on balanced and science-based management.</p> <p>Oregon's Dungeness crab fishery is already one of the most regulated and structured fisheries on the West Coast. Further restrictions of this magnitude should only be considered after comprehensive Oregon-specific biological analysis and full economic impact review.</p> <p>As someone who has dedicated more than four decades to this profession, I urge the Commission to move forward with a measured, science-based approach that protects both marine life and the fishing families who depend on this industry.</p> <p>Respectfully, Joseph Abad Commercial Fishing Captain Oregon Dungeness Crab Fishery</p>
2/17/26 16:51:55	Vicki	crittersx2@gmail.com	General public	<p>Please allow only Oregon evidence based data to drive the crab fishery. Let existing processes remain, they don't need changing.</p>
2/17/26 17:03:58	Davine Evanow	davine@fishermansgrottoinc.co	General public	<p>We are a crab fishing family. This will hurt our business</p>
2/17/26 17:07:29	Joshua Steven	Joshsteven368@gmail.com	General public	<p>We a crab fishing family and this will hurt our lively hood.</p>
2/17/26 17:09:50	Kurt Evanow	Evanowsgrotto@gmail.com	General public	<p>Commercial fisherman for 40 years. This will hurt every fisherman</p>