

Received 6/14/24, amended 6/28/24

Dear Owen,

I hope this message finds you well. I am writing to formally request a Major Amendment to Experimental Fishing Permit [REDACTED], issued by the California Department of Fish and Wildlife.

The purpose of this amendment request is to seek additional time, **up to 216 hours** (weather permitting), for the servicing of gear deployed under the aforementioned permit.

There are several reasons for our request. To be brief, 96 hours is simply not enough time. Essentially, the other fisheries our Box Crab participants plan to fish alongside Box crab will make 96 hours (currently the recreational crab fishery is permitted 216 hours of time between service intervals) virtually impossible in some cases (such as gear serviced out near the Cortes Bank. As it stands, many of the fishers looking to fish out farther have specifically delayed beginning their activity until we have an answer on this. The 96-hour rule, when an EFP is already using pop-up gear and virtual gear marking, is archaic and as outdated as vertical lines and buoys in this context. Further, it has created much concern among fishers about enforcement issues, and to be honest, a significant amount of unnecessary work and strife for those running/managing these EFPs, enforcement included. Lastly, historically, fishers report no significant increase in bycatch of undersized crabs with a longer soak time, but they have seen an increase in legal size catch.

We have the support of many eNGOs in making this request and I hope it won't pose an issue since we are running two different types of gear marking as well as electronic monitoring and all line is stored at depth for the duration of the soak, keeping whales and other sea life safe.

Thank you for considering our request. Please see the attached receipt for payment of the EFP Major Amendment Request Fee. Should you require any additional information or have any questions, please do not hesitate to contact me at the number below.

Kim Sawicki
President
Sustainable Seas Technology

