



**National  
Marine Sanctuary  
Foundation**

To: CDFW Marine Region  
Attn: EFP Coordinator  
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From: Greg Wells, Gear Innovations Manager  
National Marine Sanctuary Foundation  
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Date: September 10, 2024

Subject: Experimental Fishing Permit ([REDACTED]) Amendment Request

We would like to request the following amendments to our currently issued Experimental Fishing Permit. We understand that these changes would constitute a major amendment, and the associated fee has already been paid. Please let me know if you have any questions or require further details regarding these requests.

- 1) **Increase the Number of Authorized Agents and Vessels.** The current EFP allows up to 10 authorized agents and 10 vessels to participate in gear testing (Authorized Agents and Vessels, Special Condition 1). We request to increase this limit to 25 authorized agents and 25 vessels to better accommodate the growing interest from fishermen and to provide more opportunities for gear testing in the Dungeness crab and rock crab fisheries. This change will also provide greater flexibility, enabling quick adjustments to plans if any authorized agents are unavailable for testing, such as during the early season closures (typically lasting 2 to 3 months) in the Dungeness crab fishery.
- 2) **Allow Longer Trawls and More Traps.** The current EFP limits authorized agents to a maximum of 10 traps per trawl (Gear Allowances, Specifications and Marking Requirements, Special Condition 22b). We propose increasing this limit to 50 traps per trawl (or as deemed appropriate by CDFW) to enable authorized agents to operate more efficiently and reduce costs. Dungeness crab fishermen have observed that pop-up gear takes longer to locate, haul, and reset compared to traditional gear. Extending trawl lengths would improve efficiency by reducing the number of pop-up systems needed and lowering operational costs. Authorized agents using longer trawls would have the option to deploy pop-up systems on both ends of the trawl, allowing for gear retrieval from either end based on sea conditions or other operational factors. For authorized agents operating in the rock crab fishery or outside the statutory Dungeness crab season, we expect to use shorter

trawls or connected traps as needed to ensure safe and efficient grappling of gear in the event of pop-up systems failures.

- 3) **Increase the Number of Traps Deployed Per Trip.** The current EFP allows authorized agents to use, possess, or deploy a maximum of 150 traps per trip (Gear Allowances, Specifications and Marking Requirements, Special Condition 23). We request that this limit be increased to align with each fisherman's permit tier, which would provide greater operational flexibility and fishing opportunities for those involved in gear testing and development. Raising the trap limit, combined with the option to use longer trawls, may also encourage more fishermen to participate in gear testing, particularly those with larger vessels since they generally face higher operating costs (fuel, crew time, etc.).
  
- 4) **Extend the Trap Service Interval.** The current EFP requires authorized agents to service deployed traps within 96 hours and to notify CDFW by email if they cannot meet this requirement (Gear Allowances, Specifications and Marking Requirements, Special Condition 32). We propose extending the service interval from 96 hours (4 days) to 9 days. This adjustment would provide authorized agents with greater flexibility, improve operational efficiency, and reduce the burden of reporting, particularly in cases of adverse weather or when operating in distant fishing grounds.