

Committee Staff Summary for July 16-17, 2025 MRC

3. Commercial Coonstripe Shrimp Fishery**Today's Item**Information ☐Action ☒

Receive and discuss Department updates and recommended regulatory changes to minimize whale entanglement risk in the commercial coonstripe fishery, following emergency regulations adopted by the Commission. Develop a committee recommendation.

Summary of Previous/Future Actions

- | | |
|---|------------------------------|
| • Department notified Marine Resources Committee (MRC) of coonstripe shrimp fishery concern | November 6-7, 2024; MRC |
| • Commission approved emergency regulations to amend Section 180.15; referred topic to MRC | February 12-13, 2025 |
| • Department update and MRC discussion | March 13, 2025; MRC |
| • Receive Department-recommended regulation changes; develop MRC recommendation | July 16-17, 2025; MRC |
| • Scheduled notice hearing | October 8-9, 2025 |
| • Scheduled discussion/adoption hearing | December 10-11, 2025 |

Background

The commercial coonstripe shrimp (*Pandalus danae*) fishery is a small, open-access trap fishery that operates under Commission regulations in Section 180.15. The fishery utilizes longline trap gear, where strings of traps are connected to a groundline.

The fishery recently experienced increased participation. Prior to February 2025, there were no limits on the amount of gear or lines deployed. However, two humpback whale entanglements in 2024 near San Francisco, preceded by a similar entanglement near Crescent City in 2017, were attributed to coonstripe shrimp trap gear. Following these incidents, the Department brought the topic to the attention of MRC at its November 2024 meeting.

To address entanglement concerns, the Commission took emergency action at its February 2025 meeting. The emergency regulations establish new limits on gear usage and fishing depth for fishery participants, and a new control date of February 13, 2025. The new control date allows the Commission to limit future participation in the fishery to reduce marine life entanglement risk. The emergency regulations were implemented before the next fishery season began on May 1, 2025, serving as a temporary solution to immediately curb potential increases in gear and participation until longer-term management measures could be developed. The Commission also referred the commercial coonstripe shrimp fishery topic to MRC to explore potential longer term management measures to build on the emergency action. For further background, see Exhibit 1.

At the March 2025 MRC meeting, the Department presented an overview of the fishery and shared plans to engage the fishing fleet and other stakeholders about options that build on the emergency measures.

Committee Staff Summary for July 16-17, 2025 MRC

Update

Since March, the Department has actively engaged fishery participants and stakeholders to collaboratively explore additional management measures to enact through a regular rulemaking. The regular rulemaking is scheduled for notice in October and discussion/adoption in December 2025, with the goal of being effective before the emergency regulations expire.

At today's meeting, the Department will present an overview of near-term measures it recommends including in a regular rulemaking — focusing on areas like ropeless fishing gear, electronic monitoring, surface gear, and fishing activity reporting — and other potential changes currently being considered. Finally, the presentation (Exhibit 2) will outline several longer-term management measures the Department intends to explore for future potential action related to fishery participation, management areas, entanglement hot spots, and ropeless gear. The Department seeks an MRC recommendation to the Commission on measures to include in the regular rulemaking.

Significant Public Comments

Through a joint letter, over 30 organizations, including environmental and wildlife conservation non-governmental organizations, a tribal representative, advocacy groups, community organizations, businesses and individuals, strongly support regulations to restrict conventional vertical line trap gear use in the commercial coonstripe shrimp trap fishery, especially in seasonal biologically important areas for whale and sea turtle foraging. They also support explicitly authorizing pop-up fishing gear with submerged buoys in the coonstripe fishery. The letter expresses support for the measures proposed in Petition #2025-06 (for regulation changes), submitted by the lead signatory.

Recommendation

Commission staff: (1) Support the Department's recommendation to: (a) incorporate in a regular rulemaking the emergency regulations with proposed updates and proposed new regulatory measures, and (b) continue its discussions on, and possibly include in the regular rulemaking, buoy size and trap destruction device requirements. (2) Support the Department's plan to explore longer-term considerations for further reducing the risk of marine life entanglement, as presented and discussed today, and request the Department provide a future update on the longer-term management considerations.

Department: In a regular rulemaking, incorporate the emergency regulations with proposed updates and include new regulatory additions as presented (Exhibit 2), and possibly include buoy size and trap destruction device requirements in the regular rulemaking, depending on outcomes of ongoing Department and industry discussions.

Exhibits

1. [Staff summary from February 12-13, 2025 Commission meeting, Agenda Item 19 \(for background purposes only\)](#)
2. [Department presentation](#)
3. [Email from Ben Grundy, Oceans Campaigner, Center for Biological Diversity, transmitting joint letter from over 30 organizations and individuals, received July 3, 2025](#)

Committee Staff Summary for July 16-17, 2025 MRC

Committee Direction/Recommendation

The Marine Resources Committee recommends that the Commission: (1) request the Department develop a regular rulemaking that incorporates the emergency regulations, proposed updates, and the Department's proposed additional regulatory measures, and consider including buoy size and trap destruction device requirements, depending on the outcome of ongoing discussions; and (2) support the Department's plan to explore longer-term considerations for further reducing the risk of marine life entanglement, as presented and discussed today.

**Staff Summary for February 12-13, 2025
For Background Purposes Only**

19. Commercial Take of Coonstripe Shrimp Emergency

Today's Item

Information ☐

Action ☒

Consider adopting emergency regulations for the commercial take of coonstripe shrimp.

Summary of Previous/Future Actions

- **Today discuss and consider adopting emergency regulations** **February 12-13, 2025**

Background

Commission regulations in Section 180.15 authorize commercial take of coonstripe for any owner of a vessel that has been issued a coonstripe shrimp vessel trap permit for that vessel. Coonstripe shrimp (*Pandalus danae*) may be caught in longline trap gear, where traps are connected to a groundline anchored at each end, also referred to as a "string". Typically, a string contains 10-20 traps, but some can have up to 40 traps. Small shrimp and other bycatch can escape the trap through the mesh, typically 0.5 inches. Trap string lengths vary in different areas of the state to minimize gear conflicts and optimize placement on suitable habitat.

Participants in the coonstripe shrimp fishery also engage in other California commercial fisheries, especially Dungeness crab, salmon and groundfish, which have undergone recent closures or increased limitations. In response, participation in the coonstripe shrimp fishery has begun to increase as opportunities have declined in the other fisheries. More fishermen are anticipated to redirect their fishing effort to enter the coonstripe fishery due to the changes in fishing opportunity.

Increased participation in the coonstripe shrimp trap fishery elevates the risk of marine life entanglement, primarily by increasing the amount of trap gear in the water. More participants mean more vertical lines and a broader spatial distribution of fishing activity during the peak whale migration period, raising the chances of marine animals encountering and becoming entangled in the gear. Animals such as whales can become entangled when they make contact with the lines and become weighed down by the heavy metal traps, leading to injury or death.

Coonstripe fishing gear has been implicated in a total of three humpback whale entanglements: one in 2017 near Crescent City, and two in 2024 near San Francisco. Humpback whales are protected under the federal Endangered Species Act (ESA) and the federal Marine Mammal Protection Act (MMPA). The recent entanglements hinder progress toward California's goal of zero entanglement mortality and are in direct conflict with the federal ESA and MMPA.

Under current regulations, there are no limits to the number of fishery participants or amount of gear that can be deployed. The Department is requesting that the Commission amend Section 180.15 to reduce marine life entanglement risk for the coonstripe shrimp commercial fishery. The requested emergency regulatory action will limit additional gear usage by current fishery participants and allow the Commission to limit future participation in the fishery to reduce marine life entanglement risk; see the emergency statement in Exhibit 2 for a summary

**Staff Summary for February 12-13, 2025
For Background Purposes Only**

of the conditions that constitute the emergency. Emergency action is needed to implement the regulations before the start of the next season on May 1, 2025.

The requested regulatory amendments (detailed in exhibits 2 and 3) would:

- Update how and when to contact Department law enforcement regarding compliance with regulations;
- Define the terms “groundline” and “vertical line”;
- Establish a management boundary at the Sonoma/Mendocino county border northward to the California Oregon border, and southward to the United States/Mexico border;
- Impose a limit on the number traps per ground line;
- Impose a limit on the number of vertical lines per vessel;
- Establish a maximum depth limit of 30 fathoms for the northern fishery; and,
- Repeal the existing control date of November 1, 2001 and establish a new control date of February 13, 2025.

Today, the Department will present an overview of the fishery, proposed emergency measures, and potential for a standard rulemaking (Exhibit 5).

Significant Public Comments (N/A)

Recommendation

Commission staff: Adopt the proposed emergency regulation for the commercial take of coonstripe shrimp as recommended by the Department.

Department: Adopt the emergency regulation as proposed in exhibits 2 and 3.

Exhibits

1. Department memo, received January 24, 2025
2. Draft emergency statement and informative digest, dated January 6, 2025
3. Draft proposed regulatory language
4. Draft economic and fiscal impact statement (STD 399)
5. Department presentation

Motion

Moved by _____ and seconded by _____ that the Commission finds, pursuant to Section 399 of the California Fish and Game Code, that adopting the proposed emergency regulation is necessary for the immediate conservation, preservation, or protection of birds, mammals, fish, amphibians, or reptiles, including, but not limited to, their nests or eggs.

The Commission further determines, pursuant to Section 11346.1 of the Government Code, that an emergency situation exists and finds the proposed regulation is necessary to address the emergency.

Staff Summary for February 12-13, 2025
For Background Purposes Only

Therefore, the Commission adopts the emergency regulation to amend Section 180.15, as discussed today.



Commercial Coonstripe Shrimp Fishery Management

16 July 2025

Presented to:

Marine Resources Committee
CA Fish and Game Commission

Presented by:

Joanna Grebel
Invertebrate Program Manager
Marine Region



Outline

- I. Fishery Background
- II. Whale Entanglements
- III. Emergency Regulations
- IV. Proposed Regulations
- V. Outreach & Timeline
- VI. Recommendations



Photo: WDFW



Fishery Background

- First significant landings in 1996
- Longline trap gear
- Most effort in Crescent City and San Francisco/ Monterey Bay Area
- Historically less than 10 vessels; growth recently





Fishery Background (cont.)

- Open access; vessel trap permit required
- Open season May 1-October 31
- Control date of November 1, 2001
- No limits on gear





Whale Entanglements

- July 2017*
- July 2024
- Sept 2024
- May 2025



**2 sets of gear involved; sablefish pot was primary gear*



Emergency Regulations – Feb 2025

- Created 2 Management Areas – North/South of Sonoma/Mendocino County line

Requirement	Northern Fishery	Southern Fishery
Vertical Lines	180	60
Traps per Groundline	15	40
Maximum Depth	30 fathoms (180 feet)	None

- Established new control date of February 13, 2025



Standard Rulemaking



Summary of Proposed Regulations

Protection Type	Emergency Regulation	Standard Rulemaking
Season	May 1-Oct 31	North: May 15-Oct 31 South: No change
Fishery Participation	Unrestricted	No change
Control Date	Feb 13, 2025	No change
Management Areas	2	No change
Vertical Line Limit	North: 180 South: 60	No change
Traps/String Limit	North: 15 South: 40	No change
Depth Restriction	North: 30 fathom South: n/a	No change



New Additions to Rulemaking

Protection Type	Emergency Regulation	Standard Rulemaking
Trap Set and Bait Time	Noon on April 30th	6am day prior to opening
Ropeless fishing gear	n/a	Allowance for voluntary use
Electronic monitoring	n/a	Requirement for ropeless gear
Surface Gear	n/a	Limit length of surface line
Fishing Activity Report	n/a	Require data collection



Other Changes for Consideration

- Surface gear
 - Implement maximum buoy size
- Trap destruction device
 - Remove 5" escape hatch





Long Term Considerations

- Fishery Participation
 - Gear endorsement for vertical line use
- Management Areas
 - Increase number of areas
- Hot Spot Areas
 - Explore areas of high entanglement risk
- Ropeless Gear
 - Identify future date to require 100% ropeless gear in south
 - Requirement for new participants to use ropeless gear



Outreach

- Tribal Outreach: December 2024
- Emergency rulemaking meetings
 - November 5, 2024 (San Francisco)
 - November 13, 2024 (Crescent City)
- Public meeting: April 23, 2025 (Santa Rosa)
- Fleet meeting: June 6, 2025 (Virtual)
- Tribal Outreach: July 2025



Regulatory Timeline

Meeting	Date
Marine Resources Committee	July 16, 2025
FGC Notice Hearing	October 9, 2025
FGC Adoption Hearing	December 11, 2025
Regulation Effective Date	By April 30, 2026



Recommendation

- Develop standard rulemaking including:
 - Emergency rulemaking elements (and proposed updates)
 - New additions
- Continue discussions on buoy size and trap destruction device requirements for possible inclusion

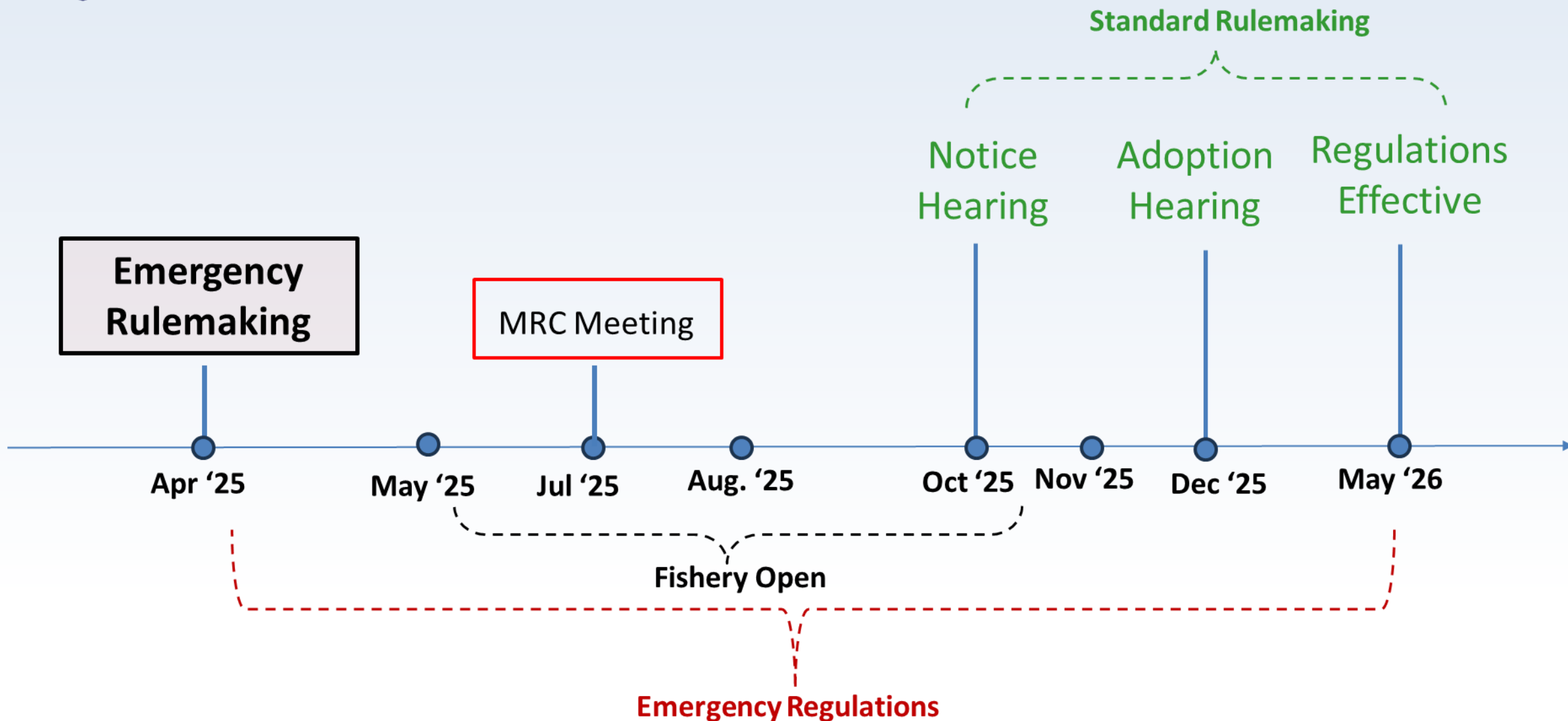
Thank You



AskMarine@Wildlife.ca.gov



Rulemaking Timeline





Fishery Background

Pounds Landed by Port Area						
	2019	2020	2021	2022	2023	2024
CRESCENT CITY	99,319	91,545	101,056	74,286	74,562	78,138
SF/MRY	0	*	*	*	47,464	62,591

**cannot be displayed due to confidentiality*



Fishery Background (Vessel/Port)

Number of Vessels by Port Area

	2019	2020	2021	2022	2023	2024
CRESCENT CITY	7	6	5	6	6	6
SF/MRY	0	*	*	*	7	9

**cannot be displayed due to confidentiality*

From: Benjamin Grundy <[REDACTED]>

Sent: Thursday, July 3, 2025 02:33 PM

To: FGC <FGC@fgc.ca.gov>

Subject: Written Comment Submission for July 16th MRC (Agenda Item 3)

Hi There,

I am submitting a Written Comment on behalf of 35 organizations regarding Agenda Item 3: Commerical Coonstripe Shrimp Fishery. This Item is scheduled to be discussed at the July 16th Marine Resources Committee meeting.

Thank you,

Ben Grundy

Ben Grundy

Oceans Campaigner

Center for Biological Diversity

[REDACTED]

Submitted via email to fgc@fgc.ca.gov

July 03, 2025

Fish and Game Commissioners
California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090

Agenda Item 3: Commercial coonstripe shrimp fishery

Dear Fish and Game Commissioners,

On behalf of our millions of members and supporters, we write to express our strong support for the petition submitted by the Center for Biological Diversity requesting that the California Fish and Game Commission (Commission) adopt regulations for the CA coonstripe shrimp fishery. The proposed regulations would prohibit the use of traps or pots with persistent vertical buoy lines in biologically important areas (BIAs) for protected whale and sea turtle species and authorize the use of approved pop-up gear systems in the fishery. Doing so is necessary to ensure that the Commission complies with its foundational role in the stewardship of the state's fish and wildlife resources.

As one of the oldest wildlife conservation agencies in the United States, the Commission is charged with ensuring the long-term sustainability of California's fish and wildlife populations and the habitats upon which they depend. Division 5.8 of the California Public Resource Code codifies that "[w]ildlife, coastal, and park land conservation is in the public interest" and is necessary to "protect significant environmental and scenic values of wildlife and plant habitat, riparian and wetland areas, and other open-space lands."¹ The California Endangered Species Act (CESA) declares "that it is the policy of the state to conserve, protect, and enhance any endangered species or any threatened species and its habitat."² Moreover, Section 2053 of the CESA makes it a policy of the state that public agencies "should not approve projects as proposed which would jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of habitat essential to the continued existence of those species."³ Congress enacted the federal Endangered Species Act (ESA) "to provide a means whereby the ecosystems upon which endangered and threatened species depend may be conserved, [and] to provide a program for the conservation of such . . . species."⁴ Section 9 of the ESA prohibits any "person" from "taking" or causing take of any member of an endangered species, including endangered whales and sea turtles.⁵ This take prohibition also applies to threatened whales.⁶ The ESA broadly defines "take" to include "harass, harm, pursue,

¹ Cal. Pub. Res. Code § 5905.

² Cal. Fish & Game Code § 2052.

³ *Id.* § 2053.

⁴ 16 U.S.C. § 1531(b).

⁵ See 50 C.F.R. § 17.11(h).

⁶ *Id.* § 223 Subpart B.

hunt, shoot, wound, kill, trap, capture, or collect” or to attempt to engage in such conduct.⁷ “Take” includes both direct and indirect harm and it need not be purposeful.⁸ The take prohibition applies to any “person,”⁹ including state, county, or municipal agencies and/or officials in their official capacity.¹⁰ The ESA further makes it unlawful for any person, including state agencies and/or state officials in their official capacity, to “cause to be committed” the take of a listed species.¹¹ Similarly, the failure to regulate in a way that avoids take of listed species can also constitute a prohibited section 9 take.¹² The duty and responsibility of the Commission to protect the public interest and “conserve, protect, and enhance” any endangered or threatened species includes the protection of threatened and endangered whales and sea turtles and the proactive management of fisheries to prevent harm to these vulnerable populations, and prevent unlawful take.

Commercial fishing gear used in the commercial coonstripe shrimp fishery is entangling, injuring, and likely killing protected marine animals. The vertical buoy lines that run from a trap set on the seafloor through the water column to a buoy at or near the surface puts marine animals at risk of entanglement. 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. If entangled animals do not immediately drown, the remaining entangling line often impedes basic movement, feeding, and reproduction, and causes chronic infection and damage to bone and muscle.

Entanglements not only cause these animals immense suffering but threaten the very existence of numerous imperiled species such as critically endangered North Pacific right whales¹³ and Pacific leatherback sea turtles¹⁴. Fishing gear is also a primary threat endangering blue whales,¹⁵ humpback whales,¹⁶ fin whales,¹⁷ sperm whales,¹⁸ and other sea turtles. In 2024, along the U.S. West Coast, there were a total of 36 confirmed whale entanglements, marking the

⁷ 16 U.S.C. § 1532(19); see also *Babbitt v. Sweet Home Chapter of Communities for a Great Oregon*, 515 U.S. 687, 704-05 (1995)

(finding that the ESA’s legislative history supports “the broadest possible” reading of the prohibition against take).

⁸ *Sweet Home*, 515 U.S. at 704.

⁹ 16 U.S.C. § 1538(a)(1).

¹⁰ *Id.* § 1532(13).

¹¹ *Id.* § 1538(g).

¹² *Animal Protection Inst. v. Holsten*, 541 F. Supp. 2d 1073, 1078-1080 (D. Minn. 2008).

¹³ NOAA Fisheries. 2023 Stock Assessment Report: Right Whale (Eastern North Pacific Stock). NMFS (2024). p. 289. https://www.fisheries.noaa.gov/s3/2024-12/2023_SAR_North_Pacific_Right_Whale_Eastern_NP_Stock.pdf.

¹⁴ CDFW. A Status Review of Pacific Leatherback Sea Turtle in California. CDFW (2021). p. 38-40. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=193844>.

¹⁵ NOAA Fisheries. 2023 Stock Assessment Report: Blue Whale (Eastern North Pacific Stock). NMFS (2024). p. 207. <https://www.fisheries.noaa.gov/s3/2024-12/2023-sar-blue-whale-enp.pdf>.

¹⁶ NOAA Fisheries. 2021 Stock Assessment Report: Humpback Whale (California-Oregon-Washington Stock). NMFS (2022). p. 178-179. <https://media.fisheries.noaa.gov/2022-08/2021-HumpbackWhale-CaliforniaOregonWashington%20Stock.pdf>.

¹⁷ NOAA Fisheries. 2023 Stock Assessment Report: Fin Whale (California-Oregon-Washington Stock). NMFS (2024). p. 215. <https://www.fisheries.noaa.gov/s3/2024-12/2023-sar-Fin-CAORWA.pdf>.

¹⁸ NOAA Fisheries. 2023 Stock Assessment Report: Sperm Whale (California-Oregon-Washington Stock). NMFS (2024). p. 158-159. <https://www.fisheries.noaa.gov/s3/2024-12/2023-sar-sperm-whale-CAORWA.pdf>.

highest number of confirmed entanglement reports since 2018.¹⁹ Twenty-four of these entanglements were confirmed off the coast of California alone, including, twenty-one humpback whale entanglements and three gray whale entanglements.²⁰ Moreover, these entanglements are likely only a fraction of the actual number of animals that are seriously injured or killed in California fishing gear because most entanglements go unobserved.²¹

Since 2017, there have been four confirmed whale entanglements in coonstripe shrimp fishing gear. In 2017, a humpback whale was observed entangled concurrently in sablefish gear and commercial coonstripe shrimp gear. The coonstripe shrimp gear found on the whale is believed to have been set in the northern portion of the fishery (north of the Sonoma/Mendocino County border). In 2024, two humpback whale entanglements in commercial coonstripe shrimp gear were confirmed in the southern portion of the fishery (south of the Sonoma/Mendocino County border). In 2025, preliminary data from the National Marine Fisheries Service shows that one humpback whale was entangled in coonstripe shrimp gear.²² Given the low number of vessels participating in the fishery, the occurrence of three entanglements in a two-year period is especially concerning. The coonstripe shrimp fishery does not have coverage to take any of these species under the federal Endangered Species Act or Marine Mammal Protection Act, making it critical that the California coonstripe shrimp fishery adopts regulations that will help it reach zero entanglements.

Removing vertical lines from the water is the only way to significantly reduce entanglement risk while allowing fishing to continue. The Commission must prioritize removing vertical lines in areas of high biological importance to whales and sea turtles. The best available science should be used to identify seasonal closures of the California commercial coonstripe shrimp fishery in areas of biological importance. Whales and sea turtles can be found all along the U.S. West Coast. In the waters off California's coastline, the highly productive California Current Ecosystem supports several species of whales, sea turtles, and other marine animals.²³ Of the many species that depend on California's nutrient rich waters, several are considered threatened or endangered under the ESA: North Pacific right whales (endangered),²⁴ blue whales

¹⁹ NOAA Fisheries. 2024 West Coast Whale Entanglement Summary. NMFS (2025), p. 1. <https://www.fisheries.noaa.gov/s3/2025-04/2024-whale-entanglements-report.pdf>.

²⁰ *Id.*

²¹ Derville, S. et al., Exposure of whales to entanglement risk in Dungeness crab fishing gear in Oregon, USA, reveals distinctive spatio-temporal and climatic patterns, 281 Biological Conservation 109989 (2023). <https://doi.org/10.1016/j.biocon.2023.109989>.

²² Information received via email from Lauren Saez, Take Reduction Team Coordinator for the West Coast Take Reduction Team at NMFS (May 2025).

²³ Calambokidis J. et al., Biologically Important Areas II for cetaceans within U.S. and adjacent waters - West Coast Region. Front. Mar. Sci. 11:1283231. (2024). P. 2. <https://doi.org/10.3389/fmars.2024.1283231>.

²⁴ North Pacific right whales have been sighted off California. See NOAA Fisheries, 18 Years of Eastern North Pacific Right Whale Sightings Shed Light on Important Habitats and Movements, Aug. 24, 2024, <https://www.fisheries.noaa.gov/feature-story/18-years-eastern-north-pacific-right-whale-sightings-shed-light-important-habitats-and>; see also Tara Duggan, One of the rarest whales in the world was just spotted in Monterey Bay, San Francisco Chronicle, Mar. 6, 2023,

(endangered), humpback whales (endangered and threatened populations), Southern Resident killer whales (endangered), and Pacific leatherback sea turtles (endangered) and other sea turtles (threatened and endangered).

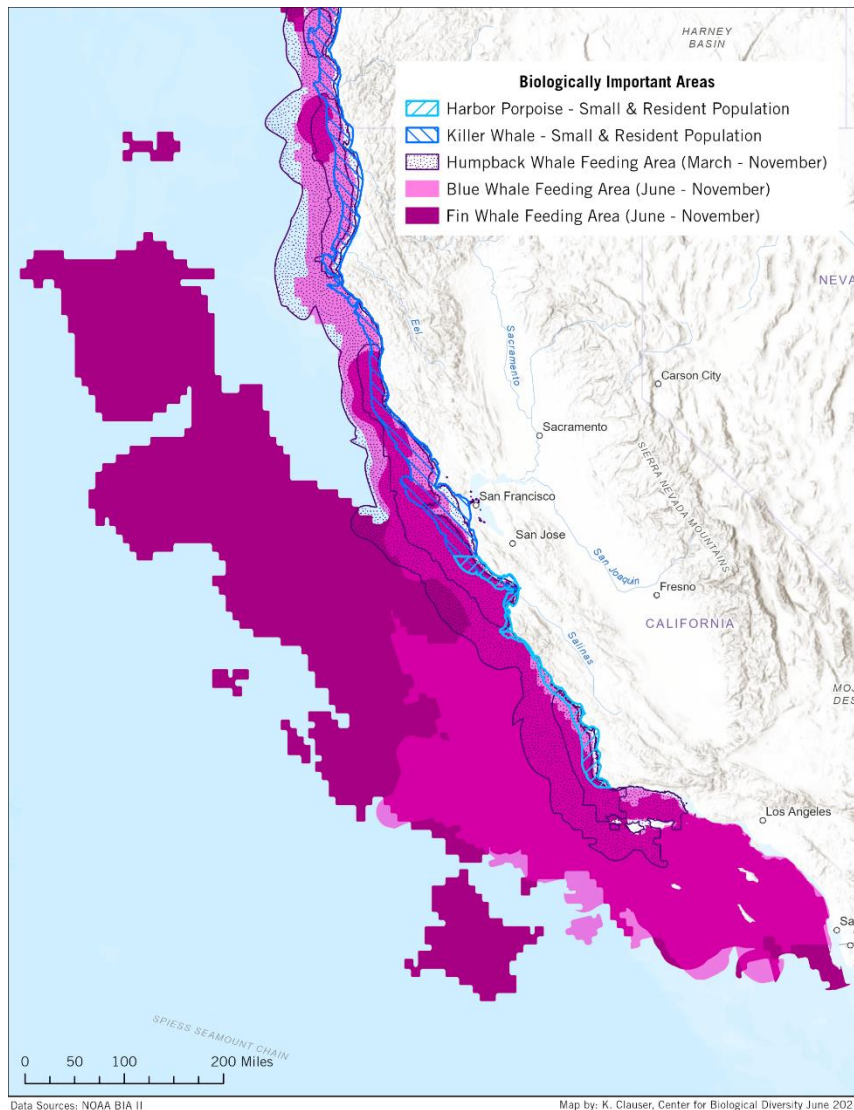
Biologically important areas (BIA) for cetaceans off the California coast are well documented. As part of a national process coordinated by the National Marine Fisheries Service, scientists examined the best available science to identify Biologically Important Areas for cetaceans off the West Coast.²⁵ Using sightings data, satellite tag data, and multi-year averaged habitat-density data, Calambokidis et al. identified biologically important feeding areas.²⁶ The purpose of BIAs is to inform management decisions, including fisheries management.²⁷ The map below highlights three of the species most frequently encountered or sighted off the coast of California:

<https://www.sfchronicle.com/climate/article/california-rare-whale-sighted-17822823.php>; Critically endangered whale spotted off California coast, NOAA confirms, ABC7 Eyewitness News, May 28, 2024, <https://abc7.com/post/critically-endangered-north-pacific-whale-spotted-off-marin/14882124/>.

²⁵ Calambokidis 2024.

²⁶ *Id.*

²⁷ BIAs have been used in federal rulemaking, for example, to inform restrictions on the use of military sonar that may harm whales.



For these species, the waters off the U.S. West Coast provide core biologically important areas for feeding from the months of June-November for fin whales and blue whales and from March to November for humpback whales.²⁸ Morphological and behavioral features of humpback whales make these whales particularly susceptible to entanglements in fishing lines. Humpback whales have long pectoral flippers and rigid structures on their head and pectoral flippers contribute to gear becoming caught on an individual. Moreover, foraging behaviors like bubble net feeding or lunge feeding can also increase the chances of a humpback whale becoming entangled since this feeding behavior involves side-rolls and twisting while foraging in the water column. The California commercial coonstripe shrimp fishery operates from May 1 through October 31 in waters within the BIA boundaries and in areas that are known to have a high likelihood of interactions between fishing gear and whales. Understanding that a large numbers of whales travel to these BIAs each year to engage in feeding behaviors that put them at

²⁸ *Id.* at 7.

increased risk of entanglement highlights the urgent need to remove vertical lines from these areas.

The Commission has a responsibility and duty to protect threatened and endangered species and the habitats that they depend on. The authorization of projects and activities that jeopardize the continued existence of an endangered or threatened species undermines CESA. The California coonstripe shrimp fishery is illegally harming protected marine wildlife and action must be taken to prevent whales and sea turtles from becoming entangled in fishing gear. The coonstripe shrimp fishery currently operates in waters known to be biologically important feeding and/or migratory areas for humpback whales, gray whales, fin whales, Pacific leather back sea turtles, and blue Whales.

To prevent further entanglements in the coonstripe shrimp fishery, the Commission should amend CCR Title 14, Section 180.15 to Title 14 California Code of Regulations Section 180.15 (c) to restrict the use of trap gear with conventional vertical buoy lines in seasonal BIAs for feeding large whales and sea turtles and clarify existing authority and explicitly authorize pop-up fishing gear with submerged buoys.

Sincerely,

Ben Grundy
Oceans Campaigner
Center for Biological Diversity

Uko Gorter
President
American Cetacean Society

Georgia Hancock
Sr. Attorney and Marine Wildlife Program
Director
Animal Welfare Institute

Jenny Berg
California State Director
Humane World for Animals

Andria Ventura
Legislative and Policy Director
Clean Water Action

Francine Kershaw, Ph.D.
Senior Scientist
Natural Resources Defense Council

Mati Waiya
Tribal Chair
Coastal Band of the Chumash Nation

Kurt Lieber
President
Ocean Defenders Alliance

Scott Webb
Director of Advocacy
Resource Renewal Institute

John Hocevar
Oceans Campaign Director
Greenpeace USA

Natalie Beebe
Secretary, Environmental Working Group
Indivisible Santa Cruz County

Bunny Zaruba
Core Group Member
Indivisible Sausalito

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Executive Director
Courage California

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Legislative Analyst
Elder Climate Action Northern California

Richard Burke
Chapter President
Elder Climate Action Southern California

Amber Jamieson
Water Advocacy Director
Environmental Protection Information Center

Jessica Craven
Director
Chop Wood, Carry Water Daily Actions

Isabella Zizi
National Organizer
Movement Rights

Judy Irving
Executive Director
Pelican Media

Lisa Owens Viani
Director
Raptors Are The Solution

Téana David
Director
Illuminate Film Festival

Pauline Seales
Organizer
Santa Cruz Climate Action Network

Denise Boggs
Executive Director
Conservation Congress CA

Lindsey Wilcox
Community Education & Outreach Manager
Pacific Marine Mammal Center

Dan Silver
Executive Director
Endangered Habitats League

Mati Waiya
Founder & Executive Director
Wishtoyo Chumash Foundation

Drew Feldman
Conservation Chair
San Bernadino Valley Audubon Society

Carla Grady
Administrator
Transition Sebastopol

Mati Waiya
Executive Director
Ventura Coastkeeper

Marilyn Price
Co-Chair
Sustainable Mill Valley

Nickolaus Sackett
Director of Legislative Affairs
Social Compassion in Legislation

Leslie Tamminen
Director of Earth and Space Science
7th Generation Advisors

Jan Dell
President
The Last Beach Cleanup

Veronica Monet
Owner
Veronica's Shame Free Zone, division of
TAP Communications

Elizabeth Purcell
Environmental Policy Coordinator
Turtle Island Restoration Network

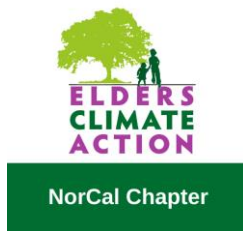




7th GENERATION
Advisors



SCIL
Social Compassion
in Legislation



The
Last
Beach
Cleanup