

## Staff Summary for October 8-9, 2025

**24. Commercial Coonstripe Shrimp Fishery Regular Rulemaking****Today's Item****Information** ☒**Action** ☐

Receive an update on development of a regular rulemaking to amend regulations regarding the commercial coonstripe shrimp fishery.

**Summary of Previous/Future Actions**

- |   |                          |
|---|--------------------------|
| • Adoption hearing for <i>emergency regulations</i>   | February 12-13, 2025     |
| • Department presented Marine Resources Committee (MRC) with proposed measures for a regular rulemaking; MRC recommendation   | July 16-17, 2025; MRC    |
| • Approved MRC recommendation for <i>regular rulemaking</i>   | August 13-14, 2025       |
| • First readoption of <i>emergency regulations</i>  | August 13-14, 2025       |
| • <b>Today, receive update on development of and timeline for <i>regular rulemaking</i>, and continue the notice decision</b> | <b>October 8-9, 2025</b> |
| • Second readoption of <i>emergency regulations</i>   | December 10-11, 2025     |
| • Notice hearing for <i>regular rulemaking</i>  | December 10-11, 2025     |
| • Adoption hearing for <i>regular rulemaking</i>  | February 11-12, 2026     |

**Background*****Emergency Regulations***

At its February 2025 meeting, the Commission adopted emergency regulations for the commercial coonstripe fishery in response to whale entanglements attributed to the fishery (Exhibit 1). The emergency regulations, designed to reduce the risk of marine life entanglement, went into effect on April 7, 2025. The Commission adopted a 90-day extension of the emergency regulations at its August 2025 meeting; they are set to expire on January 2, 2026. The Commission scheduled a second 90-day extension of the emergency regulations for its December 2025 meeting.

***Regular Rulemaking***

To ensure that the regulations enacted through emergency action are continued after the emergency regulations expire, the Department and staff began preparing for a regular rulemaking, which was scheduled for notice at this meeting. At the July 2025 MRC meeting, the Department presented recommended additions to the emergency regulations for inclusion in the regular rulemaking, including the first-ever authorization for voluntary use of ropeless pop-up gear in a California fishery. MRC recommended that the Commission support the proposed rulemaking and scope and, in August, the Commission adopted the MRC recommendation.

## Staff Summary for October 8-9, 2025

***Update***

Department and Commission staff worked diligently to develop the rulemaking documents on a compressed timeline between August and October; the goal of having a notice authorized at this meeting was to help ensure the regular rulemaking regulations would be effective before the emergency regulations expire and before the next fishing season begins on May 1. Staff was unable to complete a comprehensive review of the rulemaking documents in time for this meeting. Continuing the decision whether to authorize a notice of intent for amendments to commercial coonstripe shrimp regulations to the December 2025 meeting will allow sufficient time for thorough document preparation and review. The Commission's final consideration of the proposed amendments would then occur at the February 2026 meeting. Importantly, the revised timeline is intended to allow sufficient time for the regulations to be effective before the emergency regulations expire and before the next fishing season begins on May 1.

***Today's Meeting***

Today the Department will provide an update on refining the proposed regulations related to voluntary pop-up gear use. During the regulatory documents drafting process, the Department's Law Enforcement Division (LED) identified measures not specifically discussed with MRC, but necessary to support the effective enforcement of pop-up gear use once it is authorized. The recommended additional amendments, which are derived from special conditions added to experimental fishing permits testing pop-up gear, place restrictions on transiting through marine protected areas for any vessel using, having placed in the water, or being in possession of pop-up gear. Today, LED will present an overview of the recommended additional amendments and its collaboration with the fishing fleet on adjustments to ensure the regulations are both workable and enforceable (Exhibit 2).

**Significant Public Comments**

1. Five environmental advocacy non-governmental organizations jointly express support for a proposed regular rulemaking for the commercial coonstripe shrimp fishery. They encourage the Department and Commission to include the voluntary use of ropeless gear to promote sustainable, whale-safe fishing, and to support a mandatory full transition to ropeless gear in three years. In addition, they recommend that the regulations prohibit the use of floating groundline immediately due to entanglement risks, and request that the Commission add this provision to the proposed regulations at the notice hearing. (Exhibit 3)
2. The Center for Biological Diversity (CBD) shares its concerns regarding the entanglement of three whales in the California commercial coonstripe shrimp fishery in under a year, emphasizing that it believes the new regulations fail to sufficiently decrease entanglement risk for endangered and protected marine species. CBD expresses appreciation for the effort to encourage voluntary use of ropeless gear, but argues the limits on lines and traps are too high. CBD urges the Commission to prohibit vertical lines in biologically important areas and to establish a concrete timeline for fully transitioning the entire fishery to 100% pop-up gear. (Exhibit 4)

## Staff Summary for October 8-9, 2025

**Recommendation**

**Commission staff:** Continue to the December 10-12, 2025 Commission meeting consideration of authorizing a notice of intent to amend regulations related to the commercial coonstripe shrimp fishery.

**Exhibits**

1. [Staff summary for Agenda Item 19, February 12-13, 2025 Commission meeting \(for background purposes only\)](#)
2. [Department presentation](#)
3. [Cosigned letter from Geoff Shester \(Oceana\), Pamela Flick \(Defenders of Wildlife\), Kevin Campion \(North Pacific Right Whale Deep Green Wilderness\), Dan Silver \(Endangered Habitats League\) and Kurt Lieber \(Ocean Defenders Alliance\), received September 25, 2025](#)
4. [Letter from Ben Grundy, Oceans Campaigner, Center for Biological Diversity, received September 25, 2025](#)

**Motion (N/A)**

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 Update

9 October 2025

*Presented to:*

**CA Fish and Game Commission**

*Presented by:*

**Eric Kord**

**Assistant Chief  
Law Enforcement Division**



# Voluntary Pop-Up Gear

- Electronic monitoring
- Ropeless portal
- MPA transiting restriction (NEW)
- MPA anchorage areas (NEW)





# MPA Transiting Restrictions

- Continuous transit ( $>3$  knots)
- Gear stowed
- No anchoring



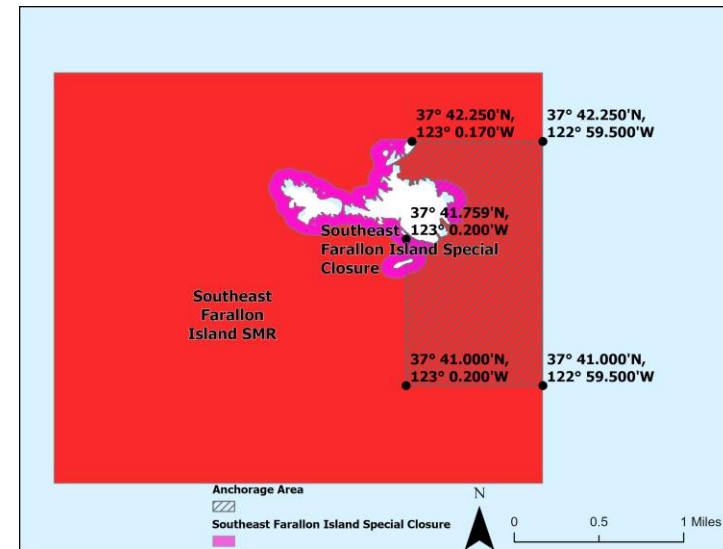
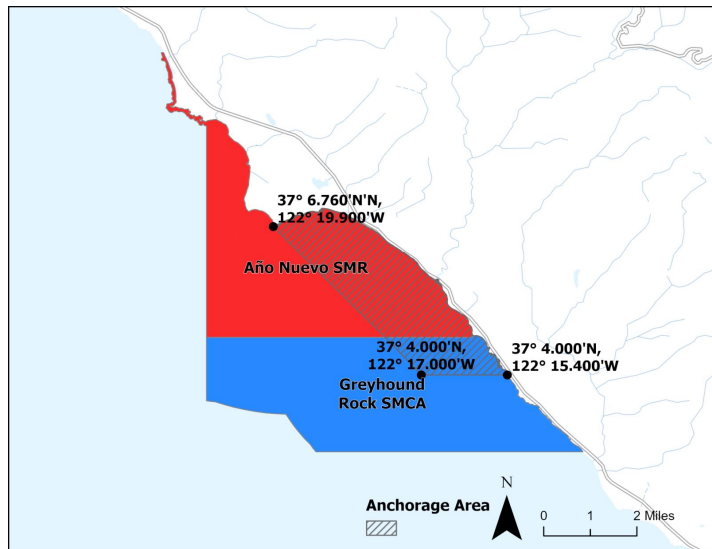
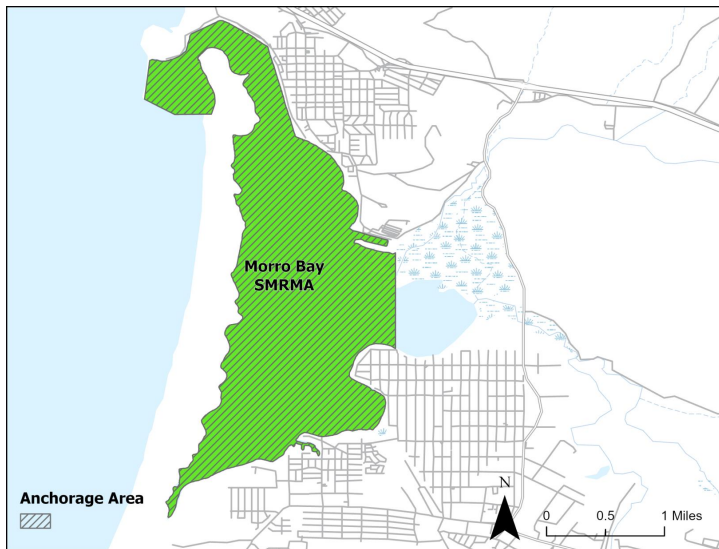
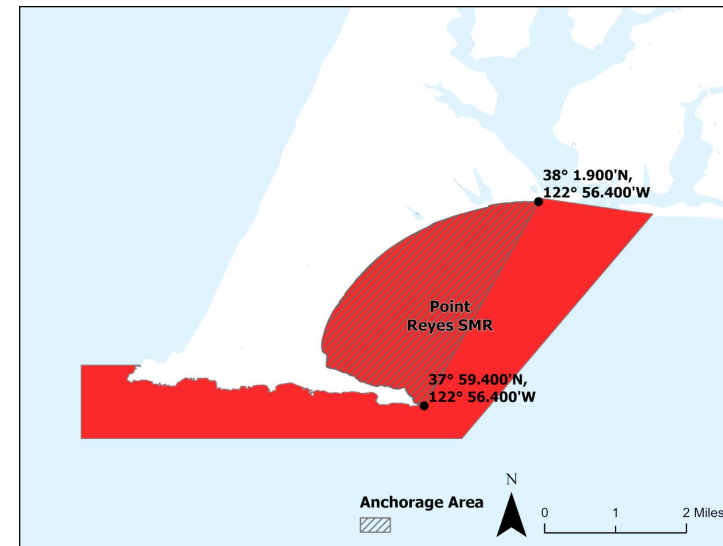
Photo: CDFW



# MPA Anchorage Areas

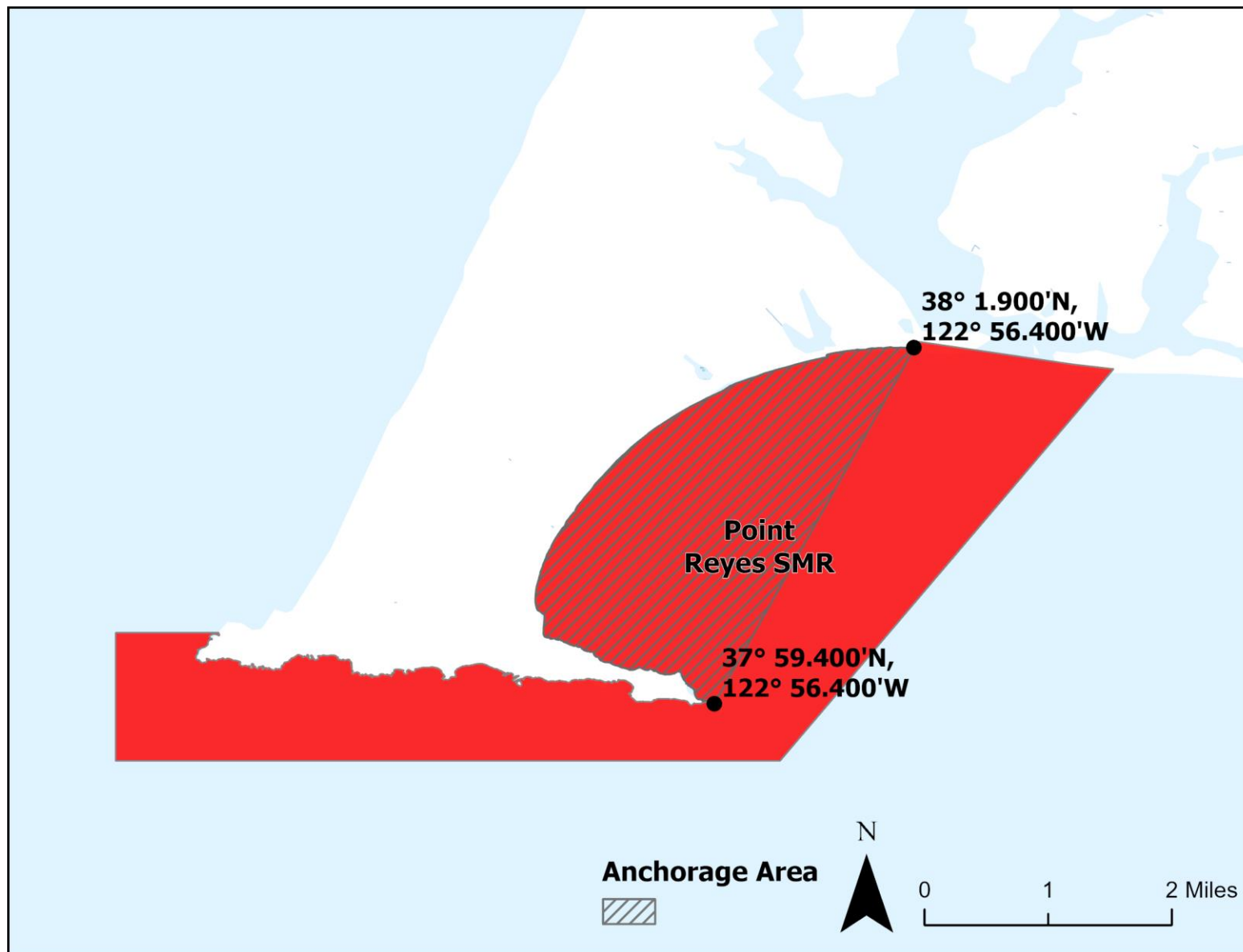
## Proposed Areas:

- Point Reyes SMR
- Southeast Farallon SMR
- Año Nuevo SMR/Greyhound Rock SMCA
- Morro Bay SMRMA



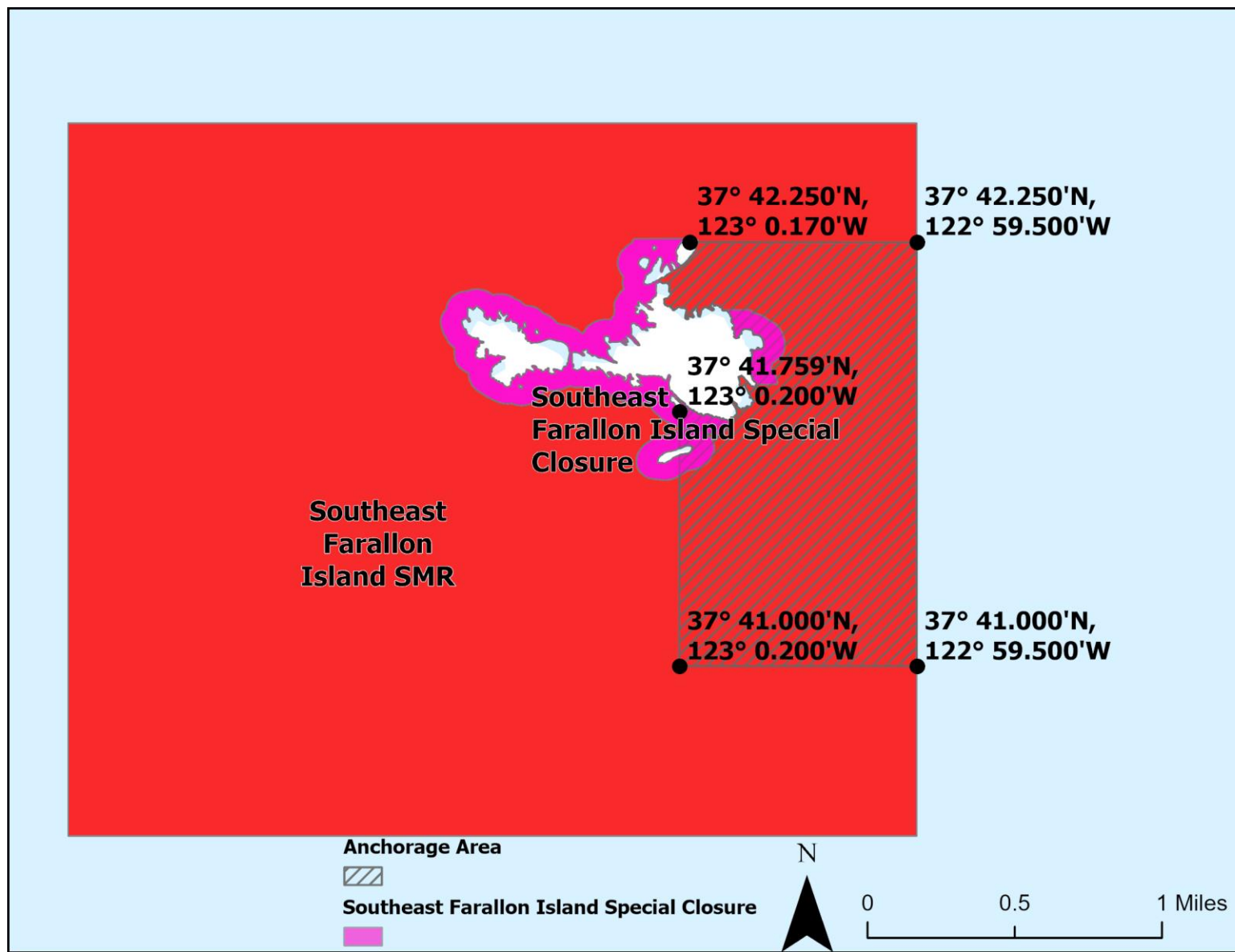


# Point Reyes SMR



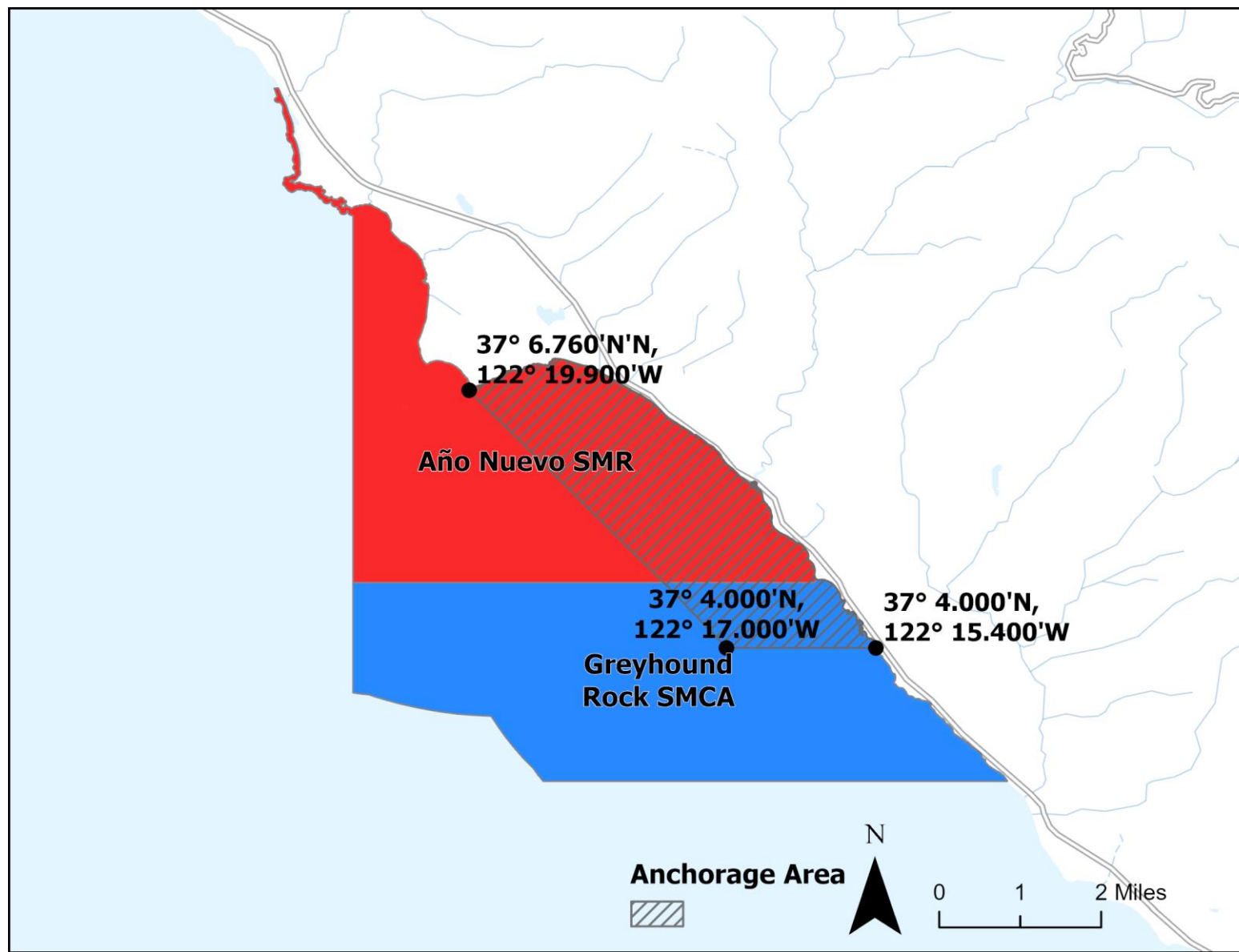


# Southeast Farallon SMR





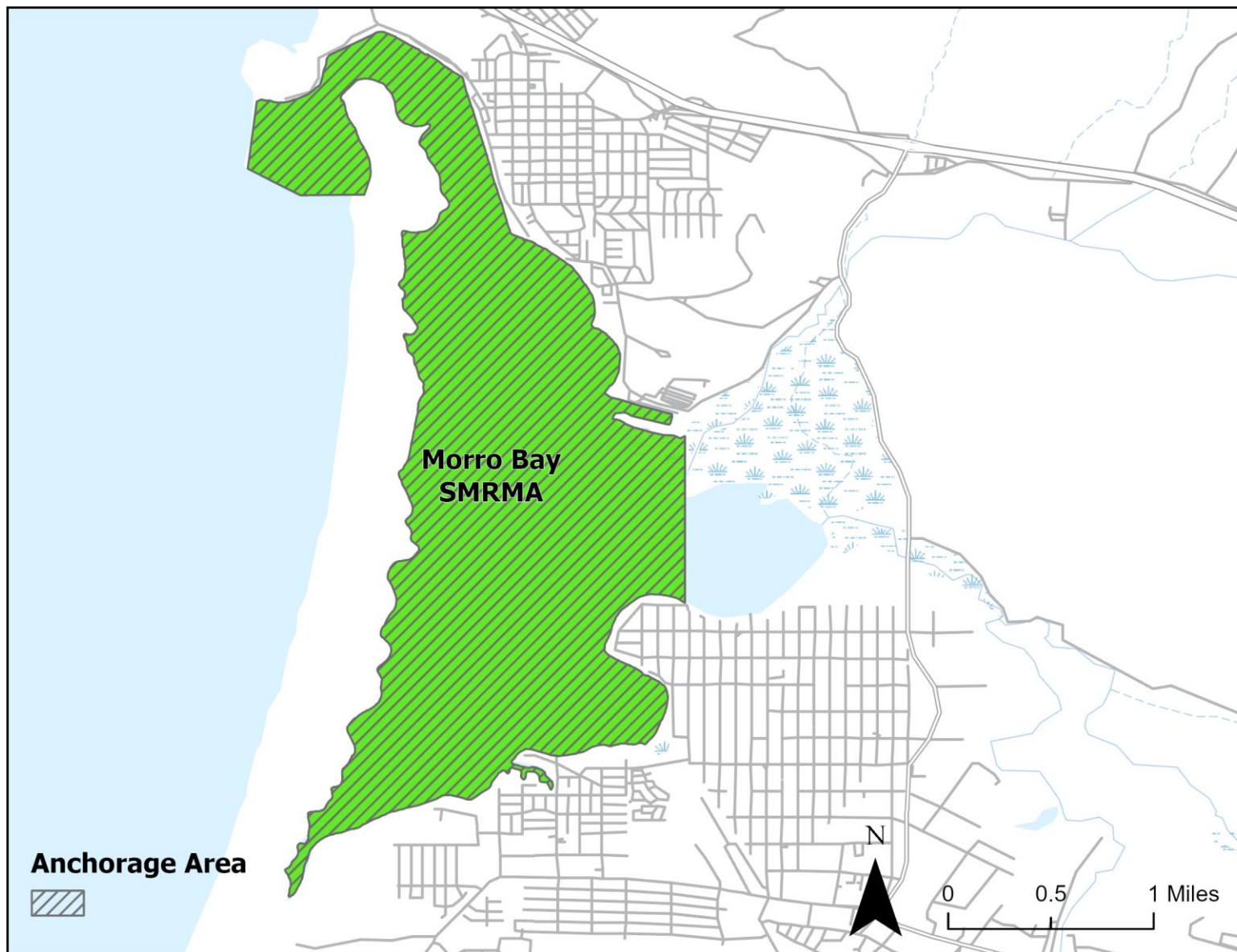
# Ano Nuevo SMR/Greyhound Rock SMCA







# Morro Bay SMRMA





# Recommendation

Include MPA transiting and anchorage provisions within scope of rulemaking for December notice meeting.



DEEP GREEN WILDERNESS



OCEANA



September 25, 2025

Dr. Erika Zavaleta, President  
California Fish and Game Commission  
P.O. Box 944209, Sacramento, CA 94244-2090  
Sent via email to [fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)

**RE: Agenda Item 24: Commercial coonstripe shrimp fishery regular rulemaking**

Dear President Zavaleta and Commissioners,

As organizations concerned about whale and sea turtle entanglements in California fisheries, we are writing in support of the California Department of Fish and Wildlife's proposed regulatory package for the coonstripe shrimp trap fishery. We are pleased that the Department and Commission have taken proactive steps --first issuing emergency regulations and now advancing a permanent rulemaking package --in response to recent confirmed humpback whale entanglements and the increase in fishing effort in the fishery. The proposed regulations benefited from multiple meetings of the Marine Resources Committee (MRC) and appear to be consistent with the MRC recommendations. Adoption of these regulations prior to the 2026 fishery season is an important step toward addressing concerns with recent whale entanglements in this fishery.

We are encouraged to see the proposed regulations allow for the voluntary use of ropeless gear. Informed by the success of Experimental Fishing Permits that tested ropeless gear in the Dungeness crab fishery, this element provides the opportunity for fishers to test and voluntarily transition to ropeless gear. This component of the package is a critical element of the vision for this fishery moving forward.

However, we request that the Commission amend the package at this meeting to prohibit the use of floating (positively buoyant) groundline in the fishery. We are concerned that floating groundline presents a significant entanglement risk and could undermine efforts to prevent entanglements. For this reason, in US East Coast lobster and Jonah crab trap/pot fisheries, regulations state that groundlines must be composed entirely of sinking line.<sup>1</sup>

---

<sup>1</sup> NOAA Fisheries. 2021. 86 FR 51970. Final Rule on regulations implementing the Atlantic Large Whale Take Reduction Plan. September 17, 2021. <https://www.federalregister.gov/documents/2021/09/17/2021-19040/taking-of-marine-mammals-incident-to-commercial-fishing-operations-atlantic-large-whale-take>



This is an important risk reduction measure to prevent whale entanglements and help ensure the success of ropeless gear. We note this concept was discussed and supported at the Marine Resources Committee meeting but was not included in the proposed regulations.

Further, we support the Department and MRC approach of fully transitioning the coonstripe shrimp trap fishery to ropeless gear. We support the mandatory use of ropeless gear for the Central Coast coonstripe shrimp fishery in three years, providing time for fishers to work with the gear and transition their equipment over time. This vision provides for a long-term sustainable, whale-safe fishery.

Sincerely,

Geoff Shester, Ph.D.  
Oceana

Pamela Flick  
Defenders of Wildlife

Kevin Campion  
Save the North Pacific Right Whale  
Deep Green Wilderness

Dan Silver  
Endangered Habitats League

Kurt Lieber  
Ocean Defenders Alliance



**Submitted via email to [fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)**

September 25, 2025

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

Agenda Item 24: Commercial coonstripe shrimp fishery regular rulemaking

Dear Fish and Game Commissioners,

The Center for Biological Diversity is concerned by the number of entanglements attributed to the California commercial coonstripe shrimp fishery and the absence of regulations to meaningfully decrease entanglement risk for marine species protected under the federal Endangered Species Act (ESA), Marine Mammal Protection Act (MMPA), and California Endangered Species Act (CESA). Given the small number of fishery participants, three confirmed entanglements from July 2024 to May 2025 is extremely concerning.

We thank the Commission for undertaking a rulemaking process to address entanglement risk in the coonstripe shrimp fishery and are specifically appreciative of the Commission's efforts to remove barriers to fishery participants using pop-up fishing gear. Adopting regulations that allow for 100% voluntary pop-up gear use in the southern zone of the fishery is a step in the right direction. However, the overall regulatory package does not sufficiently move the fishery towards entanglement risk reduction.

The regulations proposed by the California Department of Fish and Wildlife (Department) do not prevent future entanglements in the coonstripe shrimp fishery and leave the Commission and Department vulnerable to legal action for violations of the ESA. The emergency regulations adopted by the Commission, which closely reflect the regulations proposed for standard rulemaking, have already demonstrated their shortcomings as shown by the May 2025 entanglement of a humpback whale in coonstripe shrimp gear.

Per the rulemaking petition submitted by the Center for Biological Diversity, we ask that the Commission prohibit the use of vertical lines in Biologically Important Areas (BIAs) for Pacific leatherback sea turtles, humpback whales, and blue whales. If the Commission believes that additional pop-up gear testing is needed, we ask that the Commission require the Department to conduct gear testing to address any outstanding concerns about the efficacy of pop-up gear. Additionally, we ask that the Commission establish a concrete timeline for implementing the Department's long-term consideration of transitioning the fishery to 100% pop-up gear during this rulemaking process.

## Failure to Reduce the Number of Vertical Lines and Traps

The coonstripe shrimp fishing season occurs during a period of high entanglement risk due to the seasonal arrival of Pacific leatherback sea turtles and large numbers of whales who feed in the waters off California. By authorizing this fishery, the Commission risks causing the death of endangered species, so it must ensure that effective regulations are in place to prevent any entanglements from occurring.

Vertical buoy lines are known to be a major cause of marine animal entanglements and have caused countless entanglements in California fisheries. The Commission must prioritize reducing the number of vertical buoy lines used in the coonstripe shrimp fishery. Unfortunately, the proposed regulations fall short of minimizing entanglement risk and create an opportunity for risk in the fishery to increase relative to the number of vessels and the number of lines set in past years. The regulations would establish two new limits—a limit on vertical lines and a limit on the number of traps per string—but no limit on the number of vessels fishing. The limits are as follows:

- Northern Fishing Zone (North of the Sonoma/Mendocino County line)
  - 180 vertical lines
  - 15 traps per groundline
- Southern Fishing Zone (South of the Sonoma/Mendocino County line)
  - 60 vertical lines
  - 40 traps per groundline

Based on anecdotal data from members of the coonstripe shrimp fleet and documents produced by the Commission, these limits exceed the current and historic practices employed by fleet participants, which means they will not decrease the current risk level. Per the Commission’s Statement of Proposed Regulatory Action “Emergency Action to Amend Section 180.15, Title 14, California Code of Regulations Re: Commercial Coonstripe Shrimp Fishery” released on January 16, 2025, “Near Crescent City, where effort is concentrated in one small area, fishermen use more strings (30 to 90) but each is shorter (12 to 15 traps). In the San Francisco Bay Area, where more habitat is available, fishermen generally deploy fewer, but longer strings (4 to 30 strings; up to 40 traps per string).”<sup>1</sup> Therefore, the limits in the proposed regulations exceed the current practices used for deploying lines.

Setting limits that allow for more gear to be used while also allowing for more participants to enter the fishery could increase fishing gear in already tight fishing grounds. Additional fishing gear may increase gear conflict and gear loss, but more importantly, increased participation and gear usage increases entanglement risk in active gear. Throughout the Commission’s Statement of Proposed

---

<sup>1</sup> California Fish and Game Commission. Finding of Emergency and Statement of Proposed Emergency Regulatory Action Emergency Action to Amend Section 180.15, Title 14, California Code of Regulations Re: Commercial Coonstripe Shrimp Fishery, (2025), <https://share.google/zfxwQSodvrb2KcnDq>.

Regulatory Action, the Commission acknowledges that the proposed limits are “reflecting current fishing practices,”<sup>2</sup> but the limits seem to exceed current fishing practices and may encourage more effort. Moreover, current fishing practices have led to three humpback whale entanglements in less than a one-year time span and cannot be the standard when adopting regulations aimed at minimizing entanglement risk. In this rulemaking process, the Commission must significantly reduce the number of vertical lines used in this fishery.

### **Failure to Limit Participation**

Historically, fewer than 10 vessels have participated in the coonstripe shrimp fishery. Over the last several years, participation in the coonstripe shrimp fishery has increased as opportunities in other fisheries have decreased. This increase in participation correlates with an increase in the number of confirmed entanglements attributed to the fishery. Participation in the coonstripe shrimp fishery surpassed the historical average in 2024 with 15 vessels: six vessels in the port area of Crescent City and nine vessels in the port areas of San Francisco and Monterey. With a higher level of participation, coonstripe shrimp fishing gear caused two whale entanglements. Less than a year later, the National Marine Fisheries Service and the Department confirmed a third whale entanglement in coonstripe shrimp fishing gear while the emergency regulations for the coonstripe shrimp fishery were in effect. Agency officials and fishery participants have noted that this most recent entanglement occurred when participation in the fishery was low, highlighting the risk of entanglement any time a vertical buoy line is in the water. Prior to the adoption of the emergency regulations, the Commission noted the fishery’s potential for “unlimited growth in terms of participants and deployed gear” which “poses significant risk of marine life entanglement, as most of this fishery growth is likely to occur in the San Francisco Bay Area, where whales are often observed in the same area where the coonstripe shrimp fishery occurs.”<sup>3</sup> After implementing the emergency regulations and considering the proposed regulations, the risk of unlimited growth remains true.

While the proposed regulations include a new control date of February 13, 2025, this control date does not establish limits on the number of participants in the fishery. Without a process to establish a limited entry fishery or set a gear endorsement, there is no limit on the number of participants that can enter this fishery. Until such a process is established, the number of participants in the coonstripe shrimp fishery could continue to grow, leading to an increased number of vertical buoy lines during a period of high entanglement risk. For example, if three new participants enter the coonstripe shrimp fishery and use conventional fishing gear, the proposed regulations would allow these participants to each fish up to 60 vertical lines in the south and 180 lines in the north. Adding just three participants has the potential to introduce 180 new vertical lines in the south and 540 new vertical lines in the north. This potential increase in vertical lines reflects the importance of restricting participation through a limited entry fishery or gear endorsement and the inadequacy of the proposed vertical line limits. We urge the Commission to limit participation in the fleet unless and until pop-up fishing gear, i.e. whale and turtle-safe fishing gear, is required in all BIAs.

---

<sup>2</sup> Id. at p.4.

<sup>3</sup> Id. at p.2

## Complying with the Fish and Game Commission's Conservation Responsibility

The Commission holds a foundational role in the stewardship of the state's fish and wildlife resources. Division 5.8 of the California Public Resource Code (PRC) 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.'"<sup>4</sup> 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."<sup>5</sup> Moreover, Section 2053 of 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."<sup>6</sup> 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.

Fishing activities authorized under the proposed regulations could jeopardize the continued existence of the Pacific leatherback sea turtle, which is protected by CESA and the federal ESA, making it necessary for the Commission to consider the impacts of these regulations on Pacific leatherback sea turtles and any other CESA-listed animals. The latest scientific research models a continued decline in the adult female population of West Pacific leatherbacks nesting at Jamursba Medi and Wermon beaches, which are the primary nesting locations.<sup>7</sup> Assuming a continued mean decline of 6% per year since 2017, scientists predict that this female adult leatherback population would decline to 50% of their 2017 abundance by about 2030 and to 25% of their 2017 abundance by about 2041.<sup>8</sup> California Dungeness crab gear, sablefish gear, and rock crab gear have all caused entanglements of leatherback sea turtles in California waters and function similarly to commercial coonstripe shrimp gear.<sup>9</sup> Most recently, in 2023, a dead leatherback sea turtle was found in California Dungeness crab fishing gear near the San Francisco Bay area which contains fishing grounds for coonstripe shrimp. Given that similar gear types have injured and killed Pacific leatherback sea turtles in California waters, the Commission must consider whether coonstripe shrimp fishing activities risk further deepening the rapid population decline of leatherback sea turtles.

## Conclusion

---

<sup>4</sup> PRC § 5905.

<sup>5</sup> FGC § 2052.

<sup>6</sup> FGC § 2053.

<sup>7</sup> National Marine Fisheries Service. Endangered Species Act (ESA) Section 7(a)(2) Biological Opinion on Consideration of a set of Exempted Fishing Permits (EFPs) to Test Longline-Type Fishing Practices in a Portion of the U.S. West Coast Exclusive Economic Zone (EEZ), (2025), <https://repository.library.noaa.gov/view/noaa/70705>.

<sup>8</sup> Id at p. 58-59.

<sup>9</sup> CDFW. A Status Review of Pacific Leatherback Sea Turtle (*Dermochelys coriacea*) in California, (2021), <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=193844>.

The Commission has rightfully prioritized discussions of entanglement risk in the commercial coonstripe shrimp fishery, so it is important that regulations proposed in the standard rulemaking process include measures to reduce entanglements from current levels. The proposed rulemaking package does not do so. It does not reduce the number of vessels, vertical lines or traps in the fishery; and instead preserves current fishing practices which have led to several unlawful entanglements. The coonstripe shrimp fishery season coincides with a period of high entanglement risk, making any vertical line in the water a potential hazard. Several protected marine species, including humpback whales and Pacific leatherback sea turtles, engage in feeding behaviors that make them especially susceptible to entanglements in vertical buoy lines. BIAs have been mapped by scientists and must be closed to vertical lines.

Any entanglement of an ESA-listed species in coonstripe shrimp fishing gear is a violation of the federal ESA and any entanglement of a marine mammal in coonstripe fishing gear violates the MMPA, making it critical for the Commission to reach zero entanglements. We ask that the Commission uphold its conservation responsibilities outlined in state and federal statute by adopting regulations that prevent entanglements in California coonstripe shrimp fishing gear. Specifically, we ask that the Commission prohibit the use of vertical lines in BIAs, require testing of pop-up gear when needed, and establish a concrete timeline for transitioning the fishery to 100% pop-up gear.

Sincerely,

Ben Grundy  
Oceans Campaigner  
Center for Biological Diversity