PROJECT TITLE: East Pacific Red Octopus Retention As Bycatch in Coonstripe Fishery

A. CONTACT INFORMATION

1. Applicant

Name	Brand Little
Title and Affiliation	Owner
Mailing Address	[redacted]
Email Address	[redacted]
Telephone Number	[redacted]
GOID or CFL Number	[redacted]

2. Entity Administrator (if applicable)

Name	Brand Little
Title and Affiliation	Owner
Mailing Address	[redacted]
Email Address	[redacted]
Telephone Number	[redacted]
GOID or CFL Number	[redacted]

3. Authorized Agent(s) (if applicable)

Using the table below, complete a separate entry for each authorized agent.

Name	Brand Little
Title and Affiliation	Owner
Mailing Address	[redacted]
Email Address	[redacted]
Telephone Number	[redacted]
GOID or CFL Number	[redacted]

B. STATEMENT OF PURPOSE

1. Describe the purpose and goals of the proposed project, including how the project meets or is consistent with the policies of Fish and Game Code (FGC) Section 7050.

The purpose of this EFP is to collect information on the abundance of the Eastern Red Octopus as incidental bycatch in the California Commercial Coonstripe fishery. The goal is to compile the information to present an argument for legislative and regulatory change that would allow for retention as bycatch in the fishery. This would align with the with the allowed retention of octopus as bycatch in the other trap fisheries of California.

2. Provide a list of proposed project activities that are prohibited under current state fishing laws or regulations (cite the specific section number(s), if known), and the reasons to justify authorization (exemption) of those activities under the EFP.

The Commercial Dungeness Crab and Rock Crab Fisheries of California currently allow for octopus as by-catch, but there is no such allowance in the coonstriped shrimp fishery.

The specific legislative code that we are looking for an exemption from while coonstripe fishing would be:

FG Code 8595 (b) "No other species shall be taken in a prawn trap or a shrimp trap. Any other species taken incidentally with a prawn trap or a shrimp trap shall be immediately released."

C. STATEMENT OF QUALIFICATIONS

Respond to each of the following statements by providing relevant qualifications to demonstrate the ability of the applicant and, if applicable, other key participants to perform the necessary duties and responsibilities to carry out the proposed project. PLEASE NOTE: If any scientific or technical assistance is requested of CDFW, pre-application consultation is required.

1. Lead and provide supervisory oversight for all activities of the permit under the authorizations, standard terms, and special conditions.

I have an extensive background and experience in working within the standard terms and special conditions of a California EFP. I'm currently on my 4th year of operating under the special conditions of an EFP within the Box Crab Fishery and for 2023-2025 I operated under the special condition of the Sub Sea Sonics Pop Up EFP for Dungeness Crab.

2. Experience in identification, methods, and protocols specific to the requested species listed under Section E.2. of this document.

We are in our 4th year of operating in the coonstripe fishery in central California and we have become specialized in identifying the types of octopus we encounter in the coonstripe shrimp gear. There are only two, the GPO Octopus and the Easter Pacific Red Octopus. The two are very different in size and identification between the two species is easily performed.

3. Obtain all appropriate authorizations and oversee quality control measures to assure conformance to the specified standards or requirements (e.g., take appropriate measures to ensure, promote, and facilitate compliance).

As the only authorized agent on this EFP, maintaining compliance across the EFP will be easy to perform as the project vessel (Pale Horse) will be the only one participating in the collection of the species.

4. Train all persons operating under the permit.

As the only authorized agent on this EFP, maintaining compliance across the EFP will be easy to perform as the project vessel (Pale Horse) will be the only one participating in the collection of the species.

5. Coordinate field activities and communicate field findings with CDFW Marine Region.

I have a maintain a relationship with CDFW official in the Marine Region and have worked closely with them on multiple projects in the past.

6. Collect, analyze, and transmit data gathered under the EFP to CDFW Marine Region.

I am currently collecting and reporting data to the Marine Region for the Box Crab EFP and have become very familiar with the data collection, reporting and submission of said data.

D. PERMIT APPLICATION TYPE

1. Select desired permit tier.

☒ Tier 1 (For purposes other than exploratory fishing)

☐ Tier 2 (For purposes other than exploratory fishing with assistance from CDFW)

☐ Tier 3 (For the purpose of exploratory fishing)

☐ Tier 4 (For the purpose of exploratory fishing with assistance from CDFW)

2. Request permit fee reduction option consideration.

☒ Yes ☐ No

3. Has pre-application consultation with CDFW taken place with respect to this proposal? (Required for a Tier 2 EFP, Tier 4 EFP, or permit fee reduction option)

☒ Yes ☐ No

If yes, attach a copy of the pre-application consultation summary letter or provide the name and contact information of CDFW staff with whom the applicant consulted:

Hi Brand,

Thanks for chatting with us last week. This is the "closure notice" for the pre-application consultation. It essentially documents that we had the conversation (important if you request a fee reduction in your application) and memorializes the recommendations we discussed.

We have considered your initial proposal for an experimental fishing permit pursuant to California Code of Regulations (Cal. Code Regs.) title (tit.) 14, section 91, subdivision (subd.) (c)(1).

Pre-application consultation was carried out for the Octopus Bycatch EFP on March 17th, 2026.

Based on the information provided, CDFW recommends proceeding with submittal of the EFP, with the recommendation to apply for multiple authorized vessels/operators (even if unidentified at this time) and to require the use of pop-up gear if desired by the applicant.

If you have questions or need additional information after reviewing the above comments, please contact Ian Kelmartin at [redacted] or [redacted] If there are additional items you'd like to discuss as part of this pre-application consultation, please notify us by April 10th, 2026 for prompt consideration.

Please note, any comments produced by CDFW as a result of pre-application consultation are preliminary and for information only. The comments should not be construed as a decision by CDFW regarding the approval or denial of a permit application. Application for formal review and consideration for an EFP may be submitted at any time, pursuant to Cal Code Regs., tit. 14, section 91, subd. (c)(2).

Thank you for taking part in this consultation,

E. PROJECT DESCRIPTION

Describe the proposal and any other relevant details, including:

1. A description of the experimental design and research plan, including specific procedures for data collection, storage, processing, and analysis; and a timeline for implementing the project, including, if applicable, when compensation fishing is expected to occur.

The purpose of this proposed project would be to allow for retention of the East Pacific Red Octopus (aka Ruby Octopus) as bycatch while operating in the coonstriped shrimp fishery. The purpose of retention would be two fold as 300k to 500k metric tonnes of octopus are consumed worldwide and California doesn't have a directed fishery for them. The second purpose would be to avoid releasing the octopus back into the waters out of our shrimp traps where they go back down and enter the trap again to prey on the coonstripe shrimp that enter the trap. It is very common to have multiple East Pacific Red Octopus in every single shrimp pot with as many as 10 or more at a time. These octopus are voracious eaters and can eat virtually every shrimp in the trap overnight.

The sheer number of octopus that we encounter lead us to believe that there is an extremely high abundance off our coast that prey on species of key fisheries like juvenile Dungeness crab and adult coonstripe shrimp. Biologically, this species should be an ideal candidate for resiliency as it is a very short lived animal with a life span of only two years and the males naturally die off after mating while the females die off after laying their eggs.

We would be happy to assist in any biological collection of data while operating under this efp. We would also like to limit this EFP to be valid only while using the optional pop up method in the coonstripe fishery that currently allows the fisherman to decide whether they are using conventional buoys or pop up buoys.

2. A list of target species expected to be harvested as samples or for compensation under the EFP, including anticipated amounts (weight or number) and proposed use (e.g., bait, sell, personal use, or other (e.g., research or tag and release)). Add rows to the table below as needed.

Species Name
No species targeted. This will be exploratory collection of octopus as bycatch only.
Please see next table.

3. A list of species expected to be taken incidental to fishing conducted under the EFP, including anticipated amounts (weight or number), proposed use (e.g., bait, sell, personal use, discard, or other (e.g., research or tag and release)), and a description of any measures that will be used to reduce incidental catch mortality. Add rows to the table below as needed.

Species Name	Weight or Number	Proposed Use
Octopus rubescens	25,000 pounds	Sold for consumption

We currently release an average of 500-1000 individual Eastern Pacific Red Octopus every time we go through our coonstripe gear.

4. A description of the mechanisms that will be utilized to ensure that any proposed harvest limit for target and incidentally caught species are not exceeded and are accurately tracked or monitored (e.g., at sea fisheries observers, electronic

monitoring, or other reporting method); and, if applicable, a description of the vessel's capacity to accommodate an onboard observer.

As the only authorized vessel on this project, we will be responsible for maintaining our harvest records and ensuring compliance that we do not exceed the incidentally harvested species.

If the state would like to send observers out on trips, we can accommodate that request whenever needed.

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5. A description of any potential impacts on existing fisheries, habitats, or possible incidental interactions with threatened, endangered, or protected species (e.g., sea turtles, marine mammals, and birds) that could occur as a result of the project.

No impacts with existing fisheries, habitats, or protected specials identified as this EFP simply allows for retention of the East Pacific Red Octopus out of an already operational coonstripe fishery.

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6. The type and amount of gear to be used, including gear specifications and design, and, if applicable, a description of any measures and/or devices that will be used to reduce bycatch. If the project involves gear modifications or other gear innovations, the description must include the means by which CDFW staff can locate, retrieve, and inspect the proposed gear.

The type and amount of gear, gear design, and bycatch reduction will be dictated by the existing coonstripe fishery as this EFP simply allows for retention and collection of the Eastern Red Octopus out of the current Coonstripe fishery.

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7. The location and timing of the project. The description must include trip specifications, such as fishing depth, anticipated number of trips, expected trip duration, and estimated number of hauls and average soak time (for fixed gear) or estimated number of tows/sets to be made per day, and estimated duration and speed per tow (for mobile gear). For project vessels listed in Section F. of this document, the description must also identify any fishing activity that is expected to occur on the same trip as the project for purposes other than those provided by the EFP (e.g., fishing before and/or after the EFP activities).

We are requesting that this EFP requesting retention and data collection for identified species be limited to the Southern Management Zone of the Coonstripe Fishery only and that participating vessels must be using the optional pop up gear while exercising the exemptions listed under this EFP. All other activities and fishing activity shall be in compliance with the allowances under the Coonstripe Fishery.

F. PROJECT VESSELS (IF APPLICABLE)

Provide vessel information. Using the table below, complete a separate entry for each project vessel to be authorized by the EFP. For any vessel that will be used in commercial fishing activity related to the permit, the commercial boat registration number issued pursuant to FGC Section 7881 is required. For any vessel that will not be used in commercial fishing activity related to the permit, the commercial boat registration number issued pursuant to FGC Section 7881 or a copy of the United States Coast Guard (USCG) Certificate of Documentation is required. If there is no Certificate of Documentation for the vessel, a copy of the vessel's state registration is required.

Vessel Name	Pale Horse
Boat Registration Number or Documentation	[redacted]
Owner Name	Brand Little
Owner Address	[redacted]
Owner Telephone Number	[redacted]
Operator Name	Brand Little
Operator Address	[redacted]
Operator Telephone Number	[redacted]

[Add new entry here.]

G. [redacted]

X [redacted] 8/9/26

Signature of Applicant Date

H. APPLICATION FEE PAYMENT

App Fee Has Been Paid