Public comment provided at the June 29, 2022 California Dungeness Crab Task Force (DCTF) Executive Committee Meeting

Request for EFP Guidance from Sub Sea Sonics Introduction

Good morning and thank you for the opportunity to talk to you today. I'm here today to ask for your input on an experimental fishing permit for that we are planning to submit. My name is Bart Chadwick and I own a California-based small business called Sub Sea Sonics. Sub Sea Sonics has focused specifically on the development of gear for low-cost recovery of underwater equipment for over 20 years.

Since 2019, I have been actively involved in adapting this low cost gear for application to use with trap and pot fishing. In 2019, we received a BREP grant from NOAA and successfully develop a simple, low-cost timer release specifically for use in fishing applications. The development of this system relied heavily on input from fishermen and criticisms of the high complexity and cost of much of the gear that was currently being tested. This system has been now been tested in a range of fisheries including the CA Spiny Lobster, CA Dungeness Crab, SE Black Sea Bass, and initial testing in the NE American Lobster.

Background

In early 2022, we submitted a gear authorization application to CDFW to allow the use of the timer and associated gear marking app in the CA Dungeness Crab fishery under the alternative gear provision of the RAMP. This provision of the RAMP only allows for the use of alternative gear during a closure occurring after April 1, and requires all vessels using the gear to have an operational electronic monitoring system.

CDFW rejected this application citing primarily concerns with enforceability of the gear if its use became widespread. CDFW recommended that further testing be conducted under the new California EFP program to allow for a more constrained level of use so they could further assess the enforceability questions. We are currently in the process of developing that EFP and are actively seeking input from interested parties.

Objective

The objective of the EFP is to allow for the additional testing necessary to support authorization under the RAMP so fishers can voluntarily use the gear during periods of elevated entanglement risk as allowed under the RAMP, when the fishery would otherwise be closed.

Gear to be Included in the EFP

We are asking for a limited number of gear types to be tested under the EFP. These gear types were selected because they were favored by fishermen during our early rounds of testing with a wider range of gear, and they performed well during early rounds of testing.

- The Sub Sea Sonics TR4RT and AR4RT release systems (timer and acoustic)
- The Fiomarine Fiobuoy system (timer or acoustic versions)
- The Trap Timer virtual gear marking app
- Longlining of pots in conjunction with popup gear

Specific Goals of the EFP

- 1. Provide necessary information, testing results, and protocols to allow for the gear to be authorized as alternative gear under the RAMP.
- 2. Further establish the performance and limitations of the gear over the expected range of conditions for the fishery.
- 3. Work with CDFW Enforcement staff to develop and test alternative gear enforcement mechanisms.
- 4. Assess the potential to use multiple traps per line in combination with pop-up gear.

Grant Support

We have also secured a follow-on BREP grant specifically to support the expanded testing required under the EFP. This grant would provide funds for both equipment and to defray expenses for participating fishermen.

Closing

We've distributed a draft copy of the EFP to the committee and would sincerely appreciate any feedback to help make the EFP successful. In particular, we are hoping to get guidance on:

- The total number of fishing participants;
- Any limitations on the times of the year or geographic areas where gear could be tested;
- Input on the maximum number of traps on a single line;
- Any limitations to help minimize gear conflicts;
- Additions or restrictions that would make the EFP more viable;

Thanks again for your time and I would be happy to answer any questions.

Bart Chadwick, Sub Sea Sonics