

**American Cetacean Society ▪ Center for Biological Diversity ▪ Defenders of Wildlife
Earthjustice ▪ Endangered Habitats League ▪ Natural Resources Defense Council
Ocean Defenders Alliance ▪ Turtle Island Restoration Network**

March 4, 2022

Mr. Charlton Bonham, Director
California Department of Fish and Wildlife
P.O. Box 944209
Sacramento, CA 94244-2090
Email: WhaleSafeFisheries@wildlife.ca.gov

RE: Support for Alternative Gear Authorization for Use in the Commercial Dungeness Crab Fishery – Sub Sea Sonics TR4RT Ropeless Trap Timer System

Dear Director Bonham,

The Natural Resources Defense Council, American Cetacean Society, Center for Biological Diversity, Defenders of Wildlife, Earthjustice, Endangered Habitats League, Ocean Defenders Alliance, Turtle Island Restoration Network and our members and supporters in California and along the West Coast are writing in support of an alternative gear proposal—the Sub Sea Sonics TR4RT Ropeless Trap Timer system—recently submitted to your office under the Risk Assessment and Mitigation Program (RAMP) regulations. Our organizations represent the public interest in maintaining the health of marine wildlife and biodiversity off the California coast, and collectively have decades of experience in developing mitigation measures to reduce and avoid the entanglement of marine life in fixed-gear fisheries.

Development and authorization of pop-up (i.e., “ropeless”) fishing systems should be one of the Department’s topmost priorities. In our view, pop-up fishing systems are the most effective and durable means to reduce the risk of marine life entanglements while allowing whale-safe fishing to continue in areas otherwise closed because of elevated entanglement risk. Timed-release pop-up fishing systems, such as the Sub Sea Sonics TR4RT Ropeless Trap Timer system, hold significant promise for integrating into existing fishing gear and reducing entanglement risk at a reasonable cost.

The RAMP regulations provide a range of management options, including the authorization of alternative gear, to address periods of elevated entanglement risk. The regulations outline key criteria that alternative gear must meet to qualify for authorization. After reviewing the application materials, we believe that the Sub Sea Sonics system meets these criteria, and that authorization of this gear can serve an essential building block for future efforts to develop alternative gears under the RAMP. The proposed system includes a timed-release pop-up mechanism with a rope and buoy storage design; a virtual gear marking app so fishers, managers, and enforcement personnel can identify where deployed gear is located; and an electronic monitoring system to track vessel location at all times while fishing. We are impressed by the collaborative spirit among fishers, gear manufacturers, and conservation organizations to assemble this application package and feel confident that such collaboration will lead to the project’s success.

We strongly urge the Department to authorize the use of the Sub Sea Sonics TR4RT Ropeless Trap Timer system for use in closed fishing zones during the late part of the commercial Dungeness crab season beginning April 1, 2022. Approving the use of the gear this spring will increase fishing opportunities for commercial Dungeness crab fishers, accelerate the momentum for developing and testing alternative gear, and ultimately make the ocean safer for whales and sea turtles.

Thank you for your consideration.

Sincerely,

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

Joy Primrose
Oregon Chapter President
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Catherine Kilduff
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