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Roy E. Crabtree, Ph.D.  
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Dear Dr. Crabtree,

This letter requests the issuance of an exempted fishing permit (EFP) for a proposed research project that would assess the feasibility of developing a South Atlantic fishery for Caribbean spider crab *Mithrax spinosissimus* (see picture below) using modified crab traps similar to those used in the South Atlantic golden crab fishery. Please see the project description below for project details. I am requesting that this EFP, if approved, be valid for one year of sampling, which would begin one week after issuance.



### Project Overview and Objectives

During the course of lobster fishing activities in federal waters off Miami, Florida, Caribbean spider crabs are often incidentally captured with lobster traps. Caribbean spider crabs can be eaten, and upon speaking with fish market managers, can be successfully sold for consumption purposes. Spider crabs are not a federally managed species; and therefore, there is no restriction on harvest in federal waters; however, the type of traps that would be used in this project are not permitted to be used for trapping crab species other than golden crabs. This project would test the efficacy of using modified golden crab traps for harvest of Caribbean spider crabs in depths ranging from 100-400 feet in federal waters off Miami, Florida. The depths fished are inshore of where golden crab occur. Using modified golden crab traps to fish for Caribbean spiny lobster in the range of depths specified are expected to yield higher capture rates compared to the capture

rate when using typical spiny lobster traps, since the modified golden crab traps are built to settle in the appropriate position once they reach the bottom and stay there for the duration of the soak time. The experimental traps are designed so that they will fish even if they settle upside down. Additionally, larger traps are easier to deploy and retrieve at greater depths with increased catch capacity. This project also intends to track the marketability of Caribbean spider crabs harvested under the requested EFP, if approved. On a monthly basis, sales can be recorded to the degree the fish market is willing to disclose sale prices.

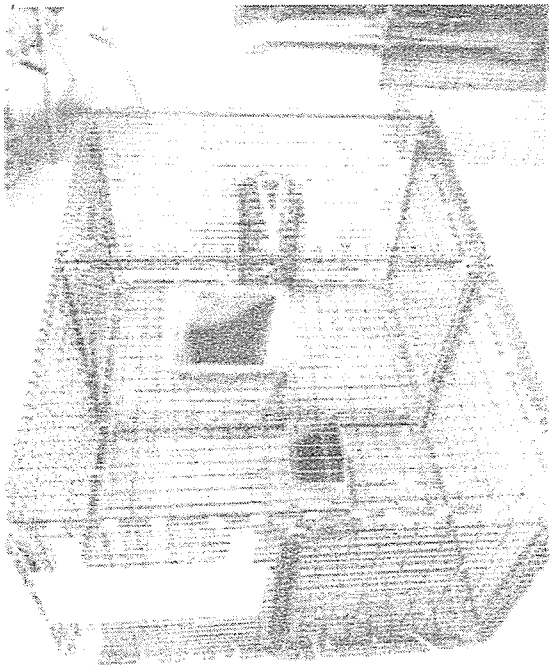
### Project Description

If granted, under this EFP, 75 modified golden crab traps would be deployed in South Atlantic waters between 25°.17'N and 25°.52'N. The traps would be deployed in federal waters in depths ranging from 100-400 feet, and would not be set on hard bottom areas including areas containing protected deep water coral species; nor would the experimental traps be set on deep water coral habitat areas of particular concern or areas closed to use of bottom tending gear. The soak time per trap is expected to range from three to four days. Traps would be baited primarily with dead fish and baits of different types may be used on a trial basis.

### Trap Configuration

According to federal regulations at 50 CFR 622.249 golden crab traps deployed or possessed in the South Atlantic exclusive economic zone (EEZ) may not exceed 64 ft<sup>3</sup> (1.8 m<sup>3</sup>) in volume in the northern zone or 48 ft<sup>3</sup> (1.4 m<sup>3</sup>) in volume in the middle and southern zones. A golden crab trap that is used or possessed in the South Atlantic EEZ must have at least one escape gap or escape ring on each of two opposite vertical sides. The minimum allowable inside dimensions of an escape gap are 2.75 by 3.75 inches (7.0 by 9.5 cm); the minimum allowable inside diameter of an escape ring is 4.5 inches (11.4 cm). In addition to the escape gaps, a golden crab trap constructed of webbing must have an opening (slit) at least 1 ft (30.5 cm) long that may be closed (relaxed) only with untreated cotton string no larger than 3/16 inch (0.48 cm) in diameter. A golden crab trap constructed of material other than webbing must have an escape panel or door measuring at least 11 7/8 by 11 7/8 inches (30.2 by 30.2 cm), located on at least one side, excluding top and bottom. The hinges or fasteners of such door or panel must be made of either ungalvanized or uncoated iron wire no larger than 19 gauge (0.04 inch (1.0 mm) in diameter or untreated cotton string any larger than 3/16 inch (4.8 mm) in diameter. The traps used in this proposed project would comply with all trap configuration requirements above.

Standard golden crab traps would be used in this project; however, the traps would be modified to include two lobster tunnels (see picture below), one on each side of the trap to ensure that regardless of which side the traps comes to rest on at least one lobster tunnel will be accessible to spider crabs. The experimental traps would be marked with the primary investigator's vessel permit number on the buoys. Approximately 25 traps would be connected on each mainline. One surface buoy would be connected to the first and last traps on each mainline for location and retrieval purposes. Each trap will also have an ID tag affixed to it.



#### Project Participants and Vessel Information

Mr. Manny Toledo is the primary investigator for this research project (see address and phone number above). Silvio Toledo 11500 SW 156 Ave. Miami, Fl. 33196 (786-255-4953) and two deck hands will be onboard the fishing vessel during sampling activities. Research activities will be carried out onboard F/V LORD OF TIDES, DO 685516 – Owner Toledo Sales Inc.

#### Project Report

Throughout the sampling year data will be collected on the number of spider crabs harvested per set or mainline, location of each set, disposition of crabs retrieved from the traps (dead, alive, injured), number and types of organisms caught in traps, and market information would be gathered from area fish markets to which the spider crabs would be sold. The project report would be submitted to the National Marine Fisheries Service Southeast Regional Office within two months of the conclusion of the sampling program. Update reports may be provided upon request at any time during the duration of the research project.

Thank you for your consideration,

  
Mr. Manny Toledo