Public Comment by
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**Background of the towlanes:**
Conflicts between tug/towboats and commercial Dungeness crab gear caused problems along the Washington, Oregon, and California coasts in the 1970s. Crab pots were fouling tugs and barges as they moved between ports, and the loss of crab gear was a severe economic problem for fishers.

Through efforts by Oregon and Washington Sea Grant programs, an agreement was reached between fishers and tug operators on areas where crab gear would not be set, providing lanes for tug and barge traffic. During its 50-year existence, the flexible and non-regulatory Crabber-Towboat Lane Agreement has saved millions of dollars in gear and vessel repair costs for both user groups.

There are three sets of towlanes that apply to crab fishers and tug operators at different times of the year: Summer towlanes are in effect April 15th – November 24th. Year-round towlanes and Advisory towlanes are in effect year-round. Dungeness crab season may begin as early as mid-November and fishing activity tapers off mid spring. Therefore, the Summer towlanes offer tug operators the option to travel closer to shore when minimal or zero crab gear is deployed, minimizing interactions.

**Learn more about the towlanes:**
[www.wsg.washington.edu/crabber-towboat](http://www.wsg.washington.edu/crabber-towboat)

**Comment for BOEM on behalf of the Crabber-Towboat Lane Agreement Coordinator:**
The Call Area does not consider the intuitive travel pathway between Year-round towlanes and nearby ports and harbors. Traffic flow to and from the existing lanes will need to be accommodated. For reference, please see image below.
In the image above, Year-round towlanes (black lanes) abut the proposed Call Area (blue polygon). Towlanes exist only in areas of shared ocean space with the crabbing industry. Therefore, there are ocean areas where towlanes may not be explicitly outlined, however vessel traffic may exist. The Call Area does not account for vessel traffic to and from the towlanes. Please note: the image above was not produced by Washington Sea Grant.