

I would like to provide the following public comments:

1. Suggest and request that the final draft FMP be peer reviewed, before being implemented by the Fish and Game Commission.
2. Request that DFW reconvene the same Review Committee to critique the modeling work for the N. Coast FMP that reviewed the Modeling work for red abalone experimental fishery proposal at San Miguel Island. The DFW and Commission should have consistent policies, and follow the precedent that was set previously.
3. Suggest that in the effort to try and integrate the two harvest control rules proposed (DFW - density approach, and TNC SPR Approach) into a single plan that the amount the DFW relies on the different methods should be balanced by the amount of data available. The less density data collected, the less that harvest control rule should be relied on, and more emphasis on the SPR method. We all know that DFW will repeat what has happened in So Cal, now that the N. Coast fishery is closed, There will obviously be pressure to curtail surveys, and collect less and less data, absent an ongoing fishery, and revenue stream.
4. The recovery goals for the abalone populations should be "feasible". Feasible, by definition under CEQA, is capable of being achieved within a reasonable amount of time. The ARMP continues to be fundamentally flawed, in that the chosen density triggers for reopening a fishery and considering the stocks to be "fully recovered" require unreasonable amounts of time. recovery periods that take decades are not reasonable recovery goals. They serve one purpose: perpetuation of the closure of the fisheries. They also presuppose that abalone populations will eventually go back to the same density levels and distributions that occurred at a previous point in time. This is absurd. Just consider the range expansion of sea otters over time, as well as changes in habitat, kelp, urchin abundance, etc etc etc. You cannot just pretend that if the fishery is eliminated, that everything affecting the population is going to be reversed. This is a erroneous cause and effect assumption. it would be more meaningful to not try to set recovery goals that seek to restore the population to what they were at some prior point in history, but to evaluate what has actually happened during the recovery period. There has been 23 yrs. of closure in So. Cal, yet there is no attempt to measure how much recovery has occurred. DFW has focused their resources on the N. Coast due to the fishery remaining open there until recently.

Thank you for your consideration.