

President Eric Sklar
California Fish and Game Commission
1419 Ninth St.
Sacramento, CA 95416

October 17, 2018

RE: Support for Deminimis Red Abalone Fishery

Dear President Sklar and Commissioners:

I am aware of the interest by some recreational abalone divers for the California Fish and Game Commission (Commission) to allow a "deminimis fishery" for red abalone, *Haliotis rufescens*, in California waters.

On October 12, 2017, I submitted a stock assessment, to the Commission, for red abalone between Pt. San Pedro and Pt. Conception which estimated there are between approximately 9,000,000 and 99,000,000 red abalone in this region. In addition, the Abalone Recovery and Management Plan (ARMP) of 2005 estimated there were 3,000,000 emergent red abalone at San Miguel Island. Based on these numbers, I suggest there are sufficient red abalone available to support such a deminimis or small scale human use fishery.

Attached is a proposal for how this deminimis red abalone might look like.

Thank you for your consideration.

Respectfully,

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Draft Proposal 3: Deminimis California Red Abalone Fishery

A deminimis—small scale—fishery for red abalone, *Haliotis rufescens*, is possible without threatening the survival of this species based on the following facts:

- 1) Red abalone are not a threatened and/or endangered species.
- 2) Tens of millions remain along the California coast, (Oregon to Mexico) and Channel Islands.
- 3) Large amounts of money are needed for management, law enforcement, and research.
- 4) Citizens deserve access to this resource.
- 5) The entire State of California will be open to this fishery.
- 6) A red abalone fishery would put more eyes in the water.

Total Allowable Catch

- * Proposed is an annual (first year) SMI harvest of 30,000 red abalone: 20,000 to commercial 10,000 to recreational. (Note: A larger TAC could reduce cost and/or raise more money for management, law enforcement, and research).
 - * A TAC for the rest of the state to be determined.
- * Minimum harvest size will be 8 inches. (Note: Many recreational fishermen seek 10 inch red abalone).
- * Each abalone, recreational or commercial, would require a fixed tag with harvester information attached.
- * Each recreational tag would sell for \$100. A maximum total of five tags would be issued per diver.
- * A lottery system would be used to select harvesters.
- * Only divers with tags will be allowed to fish, only red abalone. Each diver can only possess 5 tags annually.
- * Abalone tags may be transferred with a separate DFW fee, to be determined.
- * All divers will be allowed to use air: SCUBA or Hookah.
 - * For safety reasons, any tag owner may "gift" an abalone, on the day of a dive, to his dive partner as long as the abalone is properly tagged and reported.
- * Commercial divers with Dual Permits (urchin/ abalone) will be allowed to mix urchin and abalone loads.

Monitoring/Enforcement

- * All abalone would be photographed at time of harvest and landing data forwarded to the DFW immediately.
- * A DFW tag will be fixed to each red abalone harvested.
- * In addition, a written harvest report will be submitted to DFW within 10 days, including: Size, location taken (Latitude/Longitude/GPS) and sex of the animal.
- * Pick-up boats will be allowed.
- * Commercial landings only at Santa Barbara (or designated ports) with DFW notification ahead of landing.

Benefits/Justification

- * Allows for "Citizen Scientist" to collect data on abalone, as proposed by the Commission/DFW.
- * Allows citizen scientists to report observations on the coastline currently uncovered by DFW.

- * Provides needed financial resources to DFW which are currently unavailable.
- * Restores citizen faith in government.
- * Assists struggling coastal fishing economies: Boat builders, chandleries, fuel docks, municipal harbors.

Commercial Fishery

- * By statute, if the red abalone fishery, south of San Francisco is opened to recreational fishing, the former commercial fishery must also be opened.
- * A similar tag system has also been proposed. A \$10. tag by the commercial divers. The ARMP identified per pound landing taxes. Taxes and/or fees could be similarly structured.
 - * The original number of commercial divers was 101 in 1997. The number of these original permit holders today is unknown.
- * A TAC would have to be negotiated, possibly only allowing the fishery to **first** occur at SMI for monitoring and law enforcement purposes. Commercial fishermen have already agreed to electronic monitoring.
- * The commercial fishery operates for the benefit of those citizen who do not dive.
- * The ARMP of 2005 identified 3,000,000 emergent red abalone, 10% to 20% above commercial size (7 ¾ inches) or 300,000 to 600,000. (Appendix H).
- * These abalone would have an ex-vessel commercial value of approximately \$100. each: **\$30,000,000 to 60,000,000. for all emergent at SMI.**
 - * A 10%-20% harvest would be 30,000 to 60,000 (SMI) abalone with a \$10. per abalone tag fee would generate \$300,000. To \$600,000.
 - * Total ex-vessel value **to DFW** would be \$300,000. to \$600,000.
 - * In addition, there would be additional state, county, city landing taxes, boat registration fees, slip fees and commercial fishing license fees, enhancing coastal economies.