

To: Strategic Earth, California Department of Fish and Wildlife, California Fish and Game Commission, Ocean Protection Council, California Ocean Science Trust
From: Steven L, Rebuck
Date: August 12, 2019
RE: Comments. July 18, 2019 Abalone Fishery Management Plan meeting

Thank you for the opportunity to comment.

GENERAL COMMENTS

The red abalone resource is a statewide resource. Red abalone are not a threatened and/or endangered specie. Unfortunately for all citizens, the Department of Fish and Wildlife (DFW) has arbitrarily chosen to segregate this resource into two bio-regions. This makes no sense, except to demonstrate DFWs extreme bias against the former commercial abalone fishery and citizens living south of San Francisco.

SPECIFIC COMMENTS

De Minimis Fishery Concept.

Why does the logo of The Nature Conservancy (TNC) appear on the top of this document? TNC is not a state agency. More appropriate would be the logo of the California Abalone Association (CAA). CAA represents the former 101 commercial abalone divers of California. State law, Senate Bill 463, Thompson, recognized these divers and when and if the southern fishery is reopened, these divers would be included. These are official stakeholders. In addition, the Abalone Recovery and Management Plan (ARMP) of 2005/2006 addresses the commercial fishery in Appendix H. CAA would appear to have even more right to be recognized in this process than does TNC. CAA also submitted a fishery plan: CAA, 2009, Red Abalone Market Fishery Operation Guidelines, 173, pp. I know TNC has a plan to include Length Based Spawning Potential Ratio (SPR) to "harvest rules." However, SPR is not new. It has been around for at least 50 years, discussed by Department biologist Richard Burge in 1975 report to the Fish and Game Commission (FGC). Why the special treatment? It's pretty clear DFW has no interest in implementing SPR.

Considering there is no longer an abalone resource on the north coast, due to ARMP density requirements, this continues to be a bureaucratic exercise to nowhere. DFW does not want to talk about the larger area of the state that still has an abalone resource. What is a Fisheries Management Plan (FMP) if it is not intended to utilize a natural resource with conservation in mind? We have been waiting 22 years. The northern divers, 18 months.

I have to question: Is this the best DFW can do?