



## California Coalition of Diving Advocates

Conservation-Education-Science-Policy-Stewardship



August 4, 2014

To: Marine Resources Subcommittee Chairs Commissioner R. Rogers and M. Sutton.

RE: DISCUSSION AND POSSIBLE RECOMMENDATION REGARDING NEXT STEPS FOR DEVELOPING A RED ABALONE FISHERY MANAGEMENT PLAN.

### Preface Statements

1) We find the resent OST-Abalone-SAC report produced last March of 2014 accurate, but with a disclaimer to be expanded later herein contained, and notwithstanding the disclaimer we fully support every point (recommendation) the OST-Abalone-SAC recommended towards the assessment of abalone methodology determination and the management recommendations; henceforth the abalone FMP process should began immediately without lengthily delay and unnecessary redundancy in the process.

2) We agree with the abalone SAC position: the 8 index sites do not represent the abalone fishery. We conquer with the SAC assessments there are vast areas of red abalone resources along the California coast that have been underutilized, and that these areas been so underutilized for long periods of time and now the underutilized areas should be utilized to the extents possible employing fishery dependent data assessments.

3) We find that the Abalone SAC recognition: to have continued abalone fisheries; insisting on fishery independent data to assess abalone density criterions is most likely not possible due to availability of funding required to do so recognizing the challenges in doing so in assessment collection. The abalone SAC clearly suggest that abalone fishery dependent data assessments practiced, past and present used elsewhere throughout the world where abalone fisheries occur do provide protection of abalone resources and allow for successful abalone fisheries. Henceforth all things considered a solution to have continued red abalone fisheries lends towards fishery dependent data at this time.

4) We recognized that a perhaps a not so an unexpected event is occurring now relating to shift in effort regarding the current recreational abalone fishery. Abalone fishermen, because of the Sonoma/Mendocino split are favoring Mendocino County when they would have not done so before. Fear of using up their Sonoma allowances is the driver. Mendocino is seeing increased effort of shift that may be harmful to the abalone resources and the fishery in time.

5) We advocate that reducing the recreational abalone take to 9 per year Sonoma and south was and is unwarranted, and it is quite conceivable that if the California Fishing and Game Commission would of not received the "not appropriate" ANOVA mathematics to determine abalone density triggers, it is conceivable the commission could and would of excepted other solutions to address abalone reductions. We tenure as a solution to shifts in effort that are occurring now due to the recent 2014 abalone regulation changes and the subsequent actions of abalone fishermen, plus it is simply not correct to close or reduce access to the public when unwarranted.

At this time, we suggest that Commissions first steps, preface, towards for developing a red abalone fishery FMP process would be to correct the unwarranted reductions from Ft. Ross south terrestrial



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boundary to the Golden Gate Bridge as a starting point. We suggest that an appropriate annual limit for the area south of Ft. Ross to the Gate would be 18 per year at this time and ahead of the abalone FMP process completion. The area just described is just precisely just what the OST Abalone SAC team is referencing to north of the gate to Ft. Ross.

We position these 2016 recreational abalone season regulation changes now and until the abalone FMP process completes and that such changes are needed now. Too often DFW processes extend longer than expected.

6) Disclaimer: while the cumulative probability function assessment graphs the OST-Abalone-SAC produced may be indicating triggers have been crossed, we suggest that the indications may be false positives towards indicating that triggers were crossed. Had the DFW been practicing the OST-Abalone-SAC recommendations, i.e. less deep water transects, utilizing fixed transects and accounting for red abalone habitat; as so suggested by the OST-abalone SAC team it is quite possible that the northern red abalone fishery density triggers are not crossed.

At this time the California Coalition of Diving Advocates tenures possible recommendations and solutions regarding next steps for developing a red abalone FMP.

1. The data is in, and fact is there is no data, fishery independent that suggest that the area below Ft. Ross to Gate should not have seen reductions. The fishery dependent data that is available is poor at best only because there are only two abalone landing sites, Jenner and Tomales Point. The rest of Sonoma and Marin are recorded as other Marin. The rest of Sonoma and Marin encompass 50 miles of suitable rocky shore line those red abalones occupy presently.
2. Employ the Ft. Ross sunset clause the commission adopted and reopen the Ft. Ross, survey Ft. Ross via the OST abalone SAC recommendations. The abalone populations in the FT. Ross site are protected by the MLS precautions.
3. Our next suggestion towards the abalone FMP process is to plan for MSY practices north of the Golden Gate to California-Oregon border, and employ OY practices for red abalone fishery practices south of the Gate to Mexico.
4. We suggest for considerations of constituents that the red abalone FMP process be divided into two working group process, i.e. northern/central California and Southern Bite California below Point Conception. Both groups follow the same process.
5. We are highly suggestive that known abalone constituency leaders preview and approve the angler survey before it is released to the public for input.

Mr. Bill Bernard,  
CCDA spokes person.

[Wmfbernard1@sbcglobal.net](mailto:Wmfbernard1@sbcglobal.net)

209 482 1937

CC: Dir. C. Bonham, Fish & Wildlife, Members of Calif. Fish and Game Commission.