Watermens Alliance 2126 Porter Ct. Fairfield, CA 94533

November 28th, 2012

Jim Kellogg, President California Fish and Game Commission 1416 Ninth Street Sacramento, CA 95814-2090



RE: AGENDA ITEM #5 - ABALONE RECOVERY AND MANAGEMENT PLAN AND POSSIBLE FUTURE ACTION

Dear President Kellogg and members of the Commission,

We'd like to thank the Department for their good work in response to the Sonoma Coast die-off last year, and for adding a new survey site at Salt Point, which showed a much higher population density of abalone than at the older, heavily fished sites.

The Watermen's Alliance remains concerned about the impact of the die-off at the Sonoma Coast. We ask for your support with the continuance of the April-May closure at Fort Ross, which represents a 30% reduction to the fishing days in the area most affected by the die-off.

The latest DFG surveys show a declining population in Sonoma, but not in Mendocino County. Each county contributes almost half of the annual harvest. We all realize that the die-off caused the decline in population density at Sonoma's coast, not an expansion in harvest by divers. License sales declined by over 25% from the 2011 to 2012 seasons, and this year's license sales (and thus harvest) are now 35% less than the average over the past 10 years.

Let's consider the required action under the ARMP - the 25% reduction in harvest - "mission accomplished," without further action.

Watermens Alliance members and many divers we've heard from are strongly opposed to any reductions especially the proposed options to reduce the daily bag limit from 3 to 2 or the annual limit from 24 to 12. If a reduction in daily or annual take is implemented, this may discourage divers from purchasing licenses. The MLPA implementation, integration of punch cards, heavy fines to minor infractions and high costs of fuel all contribute to decline of abalone license sales. Loss of abalone license sales poses a real challenge to abalone management because research and staff are paid for by the proceeds of these sales. Additionally, if there are less divers venturing to the coast to dive for abalone, there will be an impact to the north central and north coast regions coastal economies.

We refer you to Sonoma County Abalone Network letter dated June 24, 2011. Sonoma County Abalone Network asked to include a quantifiable contribution to abalone recovery from the marine protected areas established under the MLPA. SCAN asked that the Department to develop a long-term management plan, which was required by 2011 in the ARMP. Watermens Alliance also respectfully requests this.

Commissioners, we would like to request and ask for your support to consider amendments to the ARMP specifically on the scientific basis of the density levels that the ARMP sets as triggers for reductions in the take of abalone.

We need scientific data or evidence to answer these two questions:

On what basis was the target of 6600 abalone per hectare chosen as a target for management?

How was .5 abalone per meter chosen as a density level that requires action to reduce the fishery?

If these triggers are arbitrary, they need to be amended.

Thank you for your consideration.

Sincerely,

Joshua Russo President

Watermens Alliance

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