Watermens Alliance 2126 Porter Ct. Fairfield, CA 94533

RE: WATERMENS ALLIANCE POSITION ON THE COMMERCIAL TAKE OF ABALONE AT SAN MIGUEL ISLAND (SMI)

The Watermens Alliance is opposed to opening the waters of San Miguel Island to any take of abalone until, and unless the populations can support a viable fishery. The Abalone Advisory Group (AAG) met for several years with stakeholders from all communities, scientific, enforcement recreational and commercial. The main deliverable from the AAG was a report on the health of the abalone population at SMI. The approved modeler concluded that the population of abalone at SMI cannot support a fishery. At one point, stakeholders of the AAG unanimously, except for the commercial abalone divers, recommended the continual closure of SMI to the take of abalone.

If an experimental fishery was allowed at SMI, several questions need to be answered:

- 1. Why choose to experiment in an area with less abalone populations than that of the two Northern California regions?
- 2. Would it not make more sense to do a controlled study at a California site with sustainable populations?
- 3. Having an elite group of Santa Barbara-based commercial abalone divers be the sole beneficiaries of the abalone at SMI, presumably held in trust for all the state's citizens, seems unfair and unbalanced.
- 4. Any opening of the resource at SMI should include at least a 50-50 participation by recreational divers, not the 90-10 split proposed by the commercial abalone fishers, who cite historical catch records for their reasoning for the lopsided split. They conveniently ignore the fact that laws favorable to commercial abalone fishers in the past strictly limited recreational take while leaving commercial take largely unregulated, which resulted in the 90-10 split favoring them.

We respectfully request denial of the CAA petition for any abalone fishery at San Miguel Island.

Sincerely,

Joshua Russo President

Watermens Alliance

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(707) 333-9575