

FGC

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Sent: Tuesday, August 26, 2014 9:18 AM
To: FGC
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Subject: MRC recommendation- Abalone Fishery Management Plan
Attachments: Letter FGC 8-25-2014.doc

Date: August 25, 2014

To: California Fish and Game Commission

From: Jim Marshall, Vice President, California Abalone Association

Subject: MRC recommendation- Abalone Fishery Management Plan

Commissioners,

My name is Jim Marshall, I have been an abalone fisher since I was 5 and my experience with abalone management began in 1974 when I joined the California Abalone Association (CAA). In the past forty years CAA has attended every consultation with state legislators, Fish and Wildlife Department (Department) biologists and managers, and Fish and Game Commission (Commission) meeting concerning abalone. CAA helped work out positive solutions in some of these cases and has forever been wedded to the idea that together we can create better management.

In the eight years after the 1997 moratorium on abalone fishing in southern California and before the Abalone Recovery and Management Plan (ARMP) was approved, the CAA engaged in countless meetings with the Department and Commission, and many consultations with international abalone experts in science and management. We also read and commented on the many drafts and revisions of the ARMP. In the nine years since approval of the ARMP, CAA has worked toward starting a small-scale "experimental" fishery to trial various methods of management that consultation has shown must be a part of a sustainable abalone fishery. Our involvement in issues concerning abalone management has been and remains deep and continuous and it informs the following rationale and recommendations.

Throughout our involvement there has been an ebb and flow of resources, both within the environment and within the Department. As the southern abalone population dropped revenue devoted to abalone management also reached a low. The Ocean Protection Council was formed partly in reaction to Department and Resource Agency's reduced ability to deal with unfunded and inadequately funded mandates thrust upon them. The Commission Science Advisor position was partly a result of former Commissioners Chrisman and Schuchat's frustration with lack of quality science advice, independent of the Department, on complex issues. The ARMP, created "in house" by the Department, was a product of that low funding era. Marine Life Management Act (MLMA) initiatives also received low or no funding in that period. The lesson learned is that adequate funding is essential to assure a Fishery Management Plan (FMP) of quality.

The replacement of the ARMP by an MLMA mandated FMP is long overdue. The recent process for creation of an FMP for lobster is the example that should be followed. That process enjoyed assured funding allowing extensive consultation with experts from outside the Department. Up-to-date information and a wide range of analyses were thereby brought to bear. This allowed the scientific portions of the FMP to reach a very high standard. Scientific portions of an abalone FMP should also receive such extensive scrutiny. To authorize the Department to go ahead with their proposal, "in house", invites a continuation of unsophisticated abalone management that has been the norm in California.

The proposed Fishery Management Plan (FMP) to manage the northern fishery will necessarily have to manage recovery in the closed Fort Ross area. This recovery/management dynamic is common in any FMP and the Department's intention to keep the ARMP active to manage recovery after existence of an FMP gives a false impression of effectiveness. Using the ARMP and an FMP to manage abalone in California will perpetuate the divergence of methods used to gauge management triggers for "recovery" and "fishery", in the north and south.

We strongly recommend the scope of the Department's proposal be developed outside its present narrow limits:

- The FMP should include red abalone throughout the state.
- To assure adequate resources, the Department should partner with outside organizations in cost-sharing arrangements to relieve the fiscal burden of enhanced scientific consultation and analysis. Such public-private partnerships would improve transparency, funding, and the science underpinning fishery management aspects of this important document.

Jim Marshall
Vice President
California Abalone Association

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