

March 9, 2020

Marine Resources Committee

Department of Fish and Game Commission

Submitted via: fgc@fgc.ca.gov

Dear Committee Member,

We, (Tribe), appreciate the time to provide these comments to the Summary of the Management Strategy Integration Process for the North Coast Recreational Red Abalone Fishery Management Plan to be considered for adoption by the California Fish and Game Commission (Commission).

Red Abalone was once a common sight along the California Coast, with beautiful shells scattered across rocky shores. We have co-existed with the species for thousands of years. Abalone is a part of our heritage and cultural identity. We have relied on it for sustenance and in return we took care of the abalone, as they would our own kin. Overharvesting, lack of food, pollution, disease, warming ocean temperature, sea level rise, and acidification are all stressors on the population. Due to this, abalone will not recover within the next few years but with careful care and observation it may be possible for a quicker recovery.

We (Tribe) recommend the Commission to recognize co-management so that Traditional Ecological Knowledge (TEK) and western science can provide adaptive management strategies options for Tribes, policy makers, fisheries managers, and local communities. TEK works on a generational timescale, meaning that patience and persistence is key to long-term development and progress. Short term solutions and experimentations of western science are no longer the only answer. Taking from Native Californian traditions of reciprocity, understanding, and patience a shift in western scientific thought processes on sustainable management should take place.

Education, cultural awareness, and adaptive management that utilizes TEK and western science are all critical aspects of abalone management. Identifying how to combine the two knowledge systems at a legal level will prove to be the most challenging aspect of adaptive management implementation. Abalone are an irreplaceable symbol of cultural identity that are necessary for the survival of Californian Tribes.

Historically, Tribes have been treated in the same manner as the public. Tribal members have had to purchase fishing licenses along with abalone tags and required to follow the take limits in sizes and quantity. These limits on sizes and quantity [for Tribes] already severely limit the amount of abalone that a Tribal individual can take for themselves, for their extended family

and to maintain cultural requirements of trade to inland Tribes and Tribal communities. In essence Tribes were put in a *de minimis* position already, each time that limits have been established.

We (Tribe) recommend to the Commission the following in regards to the fish management plan for recreational red abalone take:

1. *Open Fishery*

The Tribes require a specific number of red abalone to satisfy Tribal subsistence and ceremonial needs.

2. *Closed Fishery*

During a closed fishery, the Tribes require a Tribal *de minimis* for sustenance and ceremonial purposes. This take would be negotiated amongst the Tribes and then with the State.

3. *De minimis Fishery*

Because abalone have been a subsistence food and are required for cultural uses prior to opening a *de minimis* fishery, Tribes will require consultation with state agencies regarding the conditions of the abalone, indicators and [workplan]

We, (Tribe), would like the following as indicators for abalone management:

- Food sources monitoring (aerial, shorelines)
- Basic parameters (Dissolved oxygen, pH, temperature, nutrient loading)
- Harmful algal blooms
- Proximity of high priority collection sites to watershed/creeks/springs/stormwater drainages and have these been sampled
- Toxicity in ocean, offshore drilling, shipping lanes, etc.
- Any Tribal data

We, (Tribe), feel the best way to manage fishing zones is by ecological boundaries rather than by county jurisdictional boundaries. We understand the management becomes cost effective using county jurisdictional boundaries however, in order for the human-caused impacts to be researched, monitored and managed it would better benefit the species by looking at the ecological boundaries and impacts from inflowing surface and groundwater.

We, (Tribe), are willing to increase research, monitoring and management along the coastline within our historical use areas.

That being stated, (Tribe), would prioritize fishing zones, due to the limited data, as follows:

1. Ecological boundaries
2. Traditional territories
3. County jurisdictional boundaries
 1. Humboldt, Del Norte, Mendocino Counties

2. Sonoma, Marin Counties

The (Tribe) supports Recommendation #8, with changes, in the updated report to the commission that currently reads, *“Consider selecting an allocation scheme for recreational permits that uses a preference point lottery system for recreational permits and explore a pathway for the Commission to gain authority to consider allocating a subset of the recreational fishery TAC to Tribes and Tribal communities for subsistence.”* We support the change of *“recreational fishery TAC to Tribes...”* to *“subsistence fishery TAC to Tribes...”*.

We would like to thank the Commission and Department for involving the Tribe in the management of this precious resource. We provide these comments with a sense of great responsibility to our past, present and future generations. If you have any questions please feel free to contact (Provide contact). Thank you for your time and consideration.

Sincerely,

Tribal Chairperson/Authorized Rep