

Summary of Primary Considerations Raised in Support of or Opposition to the Proposed Actions and Reasons for Rejecting Those Considerations.

#	Name, Organization	Comment Format & Date	Summary of Comment	Response
1	Josh Russo, President, Watermen's Alliance	Public comment at Commission Meeting, 10/17/2018	a. Past event on urchin take: General report on recent urchin take effort	a. Report acknowledged; Department staff appreciates efforts to help provide information relevant to management
			b. Goal of organized events to take urchins. Recognizes that increased local take cannot impact the entire ocean, but is enough to create small, local refuge for kelp.	b. Participation of divers in such events is appreciated.
2	Paul Weakland, private citizen and former commercial diver	Public comment at Commission Meeting, 10/17/2018	a. Study on controlling urchin population using quicklime done in San Diego and Palos Verdes never led to any concrete report, past attempt to use animals as fertilizers never materialized	a. In the 1970's quicklime was used by scientist in an attempt to control urchin populations. The use of quicklime is not a proposed method of take in this rulemaking.
			b. The recent urchin boom may be a result of natural processes and the Department should be precautionary	b. The recent oceanographic conditions in northern California marine ecosystem is in large part driven by abnormally warm water resulting in decreased kelp abundance and a large increase in purple urchin abundance. The proposed increased take would only apply to northern California counties and not statewide. The Commission may consider revising the bag limit in the future as conditions improve.
			c. The effort to more fully utilize purple sea urchin resource is an attempt to acquire grant money in disguise	c. This comment speculates an effort to acquire grant money and is outside the scope of the proposed regulations. The change in bag limit in northern California counties is based on the poor state of the northern California ecosystem and an attempt to rehabilitate kelp forest habitat in several areas that could create limited, but strategic, ecosystem benefits.

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3	Ben Wolfe III	Email to Commission, 11/21/2018	a. New regulation should create an exception to 14 CCR § 1.87, and allows urchins that are harvested recreationally to be “wasted”	a. The commenter’s suggestion is noted but providing an exemption to the prohibition against “waste” under 14 CCR § 1.87 is outside the scope of the proposed changes.
4	Shasta Gaughen, Env. Director, Pala Band of Mission Indians	Email to Commission, 11/27/2018	a. No impact on Pala tribal interests, and general support for actions that protect coastal resources.	a. Support noted
5	Jeff Libarle	Email to Commission, 11/27/2018	a. Extending Abalone moratorium is good with the added take of urchin b. There should be more organized outings to harvest urchins.	a. The take of urchin is important to the recovery of kelp and abalone. b. Support for more dive events noted. At the February 6, 2019 Commission meeting, the Commission adopted higher bag limits for purple urchin in northern California counties, which provides opportunity for non-government partners such as the Watermen’s Alliance to hold more events in the future. The Department and Commission will continue to work with partners in the sustainable management of our kelp forest ecosystem.
6	Robert Soroka	Email to Commission, 12/22/2018	a. Organize More Urchin Dives in Northern California b. Allow sport divers to sell sea urchins commercially	See Response 5b b. FGC § 9054 prohibits the commercial take of any sea urchin without a commercial sea urchin diving permit. Allowing commercial sale of recreationally taken sea urchins would require a legislative action and is outside the scope of this regulatory
7	Brandi Easter, recreational diver	Email to Commission, 01/11/2019	a. Supports organized urchin harvest events. b. Support for the inclusion of Humboldt county. c. Supports increase harvest to 40 gallons.	a. See Response 5b b. Humboldt included in the approved regulation. c. 40 gallons take included in the approved regulation