NORTHWEST STRAITS
marine conservation initiative

May 13, 2010

Teresa A. Eturaspe, SEPA/NEPA Coordinator
Washington Department of Fish and Wildlife
600 Capital Way North
Olympia, WA 98501-1091

RE: Rockfish Conservation Plan and DEIS

Dear Ms. Eturaspe:

Thank you for the opportunity to comment on the Department of Fish and Wildlife's revised Draft Environmental Impact Statement (DEIS) and the revised draft Puget Sound Rockfish Conservation Plan. I appreciate the work that the Department has done to improve the original DEIS issued in October 2009.

The Northwest Straits Marine Conservation Initiative includes seven Marine Resources Committees, the Northwest Straits Commission and a non-profit Foundation. We conduct a variety of marine conservation, restoration and education activities in the Northwest Straits region of Puget Sound. We are the lead organization conducting derelict fishing gear survey and removal operations and we have done quite a bit of work investigating the impacts of derelict fishing gear on marine life and habitats in Puget Sound.

County Marine Resources Committees

Clallam
Island
Jefferson
San Juan
Skagit
Snohomish
Whatcom

In Cooperation with Participating Tribal Co-Managers

We have a strong interest in the recovery of rockfish populations in Puget Sound and have collected a substantial amount of data regarding the impacts of derelict fishing gear on rockfish species through our derelict fishing gear project. We maintain an extensive database that includes all species caught in derelict fishing nets as they are removed and documents the type of habitat, location and depth of the gear.

As mentioned in the DEIS, derelict fishing nets have a substantial impact on rockfish populations. Given this impact, we encourage the Department to include an action statement that supports the Northwest Straits Initiative's continued removal of derelict fishing nets in Puget Sound and encourages new funding for removal of derelict nets at depths greater than 100 ft.

Our derelict net removal work has resulted in over 2800 derelict fishing nets removed from Puget Sound since 2002 and we expect to remove several hundred more by the end of 2010. This work restored 426 acres of marine habitat, much of which is now available to serve as

Northwest Straits Commission
10441 Bayview-Edison Road
Mount Vernon, WA 98273

phone: 360.428.1064
web: www.nwstraits.org

rockfish nursery and rearing areas. Removal of the nets also removes a large source of mortality for rockfish species. We are working with NOAA fisheries to extend our net removal work into deeper waters which we anticipate will provide further benefit to rockfish species. I encourage the Department to acknowledge these actions in the DEIS and draft plan.

The Northwest Straits Initiative supports actions that protect existing habitat and restore degraded natural habitat for rockfish. We also encourage changes to fishing regulations and policies that better protect rockfish and allow for large, reproductively mature females to persist. The large females are substantially more successful at reproducing than smaller fish. We support carefully designed marine reserves for the purposes of restoring rockfish populations. We support the approach that was defined in the tribal policy statement on marine reserves, marine protected areas and sanctuaries as provided to the Secretary of Commerce by Billy Frank Jr., Northwest Indian Fisheries Commission in July, 2003.

We support the use of best available science, but we're not convinced that the policies proposed by WDFW are based on best available science. Specifically, we are concerned with the policy area of "Enhancement," (3.3.8). The discussion of hatchery production references the potential for collection of wild adult rockfish for culture that could cause mortality of adult rockfish during capture or captivity. However, the document does not address the greater concern that captive rearing and release of young rockfish has the potential to introduce diseases back into wild populations of rockfish, nor does the document address the problem of loss of genetic diversity associated with hatchery production. We find the current treatment of these issues inadequate, and request that these issues be directly addressed in the revised document.

Lastly, in the discussion of artificial habitat in Chapter 3, the section fails to acknowledge that artificial habitats likely do not provide the same quality of habitat as natural habitats even though that point is raised and referenced in section 2.4.4. The enhancement section 3.3.8 states "(a)s needed, artificial habitat will be constructed to enhance, or increase available habitat for rockfish populations," yet there are no scientific data demonstrating that habitat availability limits rockfish abundance in Puget Sound.

Consequently, the Northwest Straits Initiative does not find a compelling reason to use artificial habitats or hatcheries to promote rockfish recovery and is concerned that these approaches may have unintended negative consequences for the recovery of rockfish.

We look forward to continuing to work with the Department on this important issue.

Sincerely,

Ginny Broadhurst
Director, Northwest Straits Commission

Northwest Straits Commission
10441 Bayview-Edison Road
Mount Vernon, WA 98273

phone: 360.428.1064
web: www.nwstraits.org

From: Bob Jacobs
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 10:42:50 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

PLEASE TAKE THIS SITUATION VERY SERIOUSLY AND DO WHAT IS REALLY NEEDED. HALF MEASURES WILL NOT SUFFICE.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Bob Jacobs
720 Governor Stevens Ave. SE
Olympia, WA 98501-3458

3

From: Mike conlan
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 1:54:26 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Mike conlan
6421 139th Place NE
Redmond, WA 98052

4

From: Larry Lowther
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 12:14:50 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Larry Lowther
107 W. 9th Ave.
Ellensburg, WA 98926-2907

5

From: Rick Davis
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 11:15:40 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Rick Davis
8 Columbia Key
Bellevue, WA 98006

6

From: James McRoberts
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 10:54:07 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

James McRoberts
5430 Lake Wash Blvd SE
Bellevue, WA 98006-2643

7

From: David Woodruff
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 10:53:36 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

David Woodruff
1633 Water street #8
Port Townsend, WA 98368

8

From: Reingard Rieger
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 10:47:27 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Reingard Rieger
8804 Ashworth Ave N
Seattle, WA 98103

From: Margot Boyer
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 10:43:40 AM

Dear WDFW

As a Washington native, educator in the community college system, and Vashon Island resident, I take seriously my responsibility to help protect and heal the ecosystems of Puget Sound.

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Margot Boyer
PO Box 746
VAshon, WA 98070

10

From: Jenny Clark
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 7:14:15 PM

Dear WDFW

I live in the Puget Sound Region and love the beautiful outdoors and all of the wildlife and sealife that it encompases. I am an avid birder and have voluntered my time at the Seattle Aquarium.

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jenny Clark
1516 243RD PL SE
Bothell, WA 98021

11

From: Darcy Rue
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Monday, May 17, 2010 10:14:54 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Darcy Rue
5017 37th Ave N.E.
Seattle, WA 98105

12

From: Franklin Eventoff
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Monday, May 17, 2010 3:00:45 PM

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Franklin Eventoff
16120 Park Place
Bow, WA 98232

13

From: Andrea Pike
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Monday, May 17, 2010 3:00:21 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Andrea Pike
16120 Park Place
Bow, WA 98232

14

From: Tracy Ouellette
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Monday, May 17, 2010 12:43:45 PM

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Tracy Ouellette
14078 MacTaggart Ave
14078 MacTaggart Ave
Bow, WA 98232

15

From: Linda Swan
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Monday, May 17, 2010 11:02:50 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Linda Swan
P O Box 224
Snohomish, WA 98291

16

From: Anthony Buch
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Sunday, May 16, 2010 5:20:23 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Anthony Buch
867 sw thornberry dr.
Oak harbor, WA 98277

17

From: Robert and Gail Stagman
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Sunday, May 16, 2010 9:37:01 PM

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Robert and Gail Stagman
7401 92nd Place SE
Mercer Island, WA 98040

From: Kari Krom
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Sunday, May 16, 2010 6:06:00 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Kari Krom
7209 NE 13TH AVENUE A-12
Vancouver, WA 98665-0412

19

From: Jayme Selig
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Sunday, May 16, 2010 4:00:55 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jayme Selig
20700 Kingston St. NE
Indianola, WA 98342

From: Sue Chickman
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Sunday, May 16, 2010 3:47:34 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS).

Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

I would like WDFW to convene a panel of experts immediately upon plan adoption to begin planning the network of protected areas necessary to accomplish recovery.

Rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished. The planet is getting smaller with each new decade of population increase. It is time to look at our natural resources as one connected ecosystem. If we lose rockfish to overfishing, the ecological balance will have yet another nail in the coffin of the natural process that supports humanity.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Sue Chickman
220 Strawberry Field Dr
Sequim, WA 98382-8368

21

From: Sander Lazar
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Sunday, May 16, 2010 9:04:49 AM

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Sander Lazar
1423 NE 63rd Street
Seattle, WA 98115

22

From: Angeline Zalben
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Saturday, May 15, 2010 4:58:54 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Angeline Zalben
404 20th Ave
Seattle, WA 98122

23

From: bruce von Borstel
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Sunday, May 16, 2010 7:16:57 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

bruce von Borstel
2922 W. Sequim Bay Rd.
Sequim, WA 98382

24

From: Melissa Ropke
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 4:53:09 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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As a Seattle Aquarium volunteer I have been aware of the devastation to rockfish habitat and population for some time. Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Melissa Ropke
4118 Greenwood Ave N
Seattle, WA 98103

25

From: Mona Ching
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 1:20:05 PM

Dear WDFW

Dear Representative Washington Department of Fish and Wildlife:

I am a volunteer Beach Naturalist with the Seattle Aquarium, a sea kayaker, and a fly-fisherwoman. I am writing in support of the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS).

Their low fertility rates, especially in their earlier years, make rockfish especially vulnerable to overfishing. Protecting the rockfish from overfishing until the populations can recover is vital, as is preserving the ecosystems in which they live. Conservation plans need to be long-sighted and data-driven, as it will likely take many years for the rockfish to reach healthy numbers again. Rockfish are an important part of the Puget Sound ecosystem themselves, and a healthy rockfish population is important for people in more ways than just as seafood.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Sincerely,
Mona Ching

Mona Ching
710 N 41st Street
Seattle, WA 98103

From: Joe Ginsburg
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Sunday, May 16, 2010 2:45:08 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Joe Ginsburg
12210 Densmore Ave. N.
S, WA 98133-7729

From: Carol von Borstel
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Saturday, May 15, 2010 7:07:08 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Carol von Borstel
2922 W. Sequim Bay Rd.
Sequim, WA 98382

28

From: Laurette Culbert
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Saturday, May 15, 2010 9:47:33 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Laurette Culbert
5123 2nd Ave. NW
Seattle, WA 98107

From: Lindell Haggin
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 1:34:05 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Lindell Haggin
15418 N. Little Spokane Dr.
Spokane, WA 99208

30

From: Linda Thompsen
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 12:31:42 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Linda Thompsen
18425 NE 95th St. #27
Redmond, WA 98052

From: Pamela Engler
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 10:31:37 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Pamela Engler
7022 - 21st Avenue NE
Seattle, WA 98115

32

From: John Garner
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 10:20:25 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

John Garner
1014 N Washington
Tacoma, WA 98406

33

From: M. David Prisbrey
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 10:20:24 AM

Dear WDFW

As a reisdent of West Seattle near the Fauntleroy waterfront I feel compelled to do what I can to help keep Puget Sound a healthy & viable habitat so that my son can continue to enjoy the area as I have. Please consider the following conservation plan.

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Best regards,
M. David Prisbrey & Atticus Prisbrey(son)

M. David Prisbrey
9236 47th Ave Sw
Seattle, WA 98136

34

From: Terry Paull
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 9:48:10 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Terry Paull
3504 SW Webster St. #313
Seattle, WA 98126

35

From: John Schmied
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 9:21:08 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, the preferred alternative in the draft Environmental Impact Statement (DEIS).

The Puget Sound Rockfish is a long lived indicator species whose populations has been hammered strictly because we haven't balanced the longevity and natural history of the fish properly with the "need" to keep folks fishing.

Fishing at all costs isn't the answer. It didn't work on the Bering Sea, in the Gulf of Alaska or anywhere else in the world.

DFW needs to convene a panel of experts immediately upon adoption and put into effect a network of protected areas necessary to accomplish recovery.

Its time to balance our personal needs with our overarching need, that of having a healthy, diverse ecosystem.

Thank you for the opportunity to provide my public comments on the Puget Sound Rockfish Conservation Plan.

John Schmied
12826 NE 185th CT
Bothell, WA 98011

35

From: Ed Schein
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 7:38:39 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Just like National Parks on land, we need large restricted areas of Puget Sound. This restriction will also help our anadromous fish restoration efforts throughout our upland watersheds.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Ed Schein
20427 NE 162nd St
Woodinville, WA 98077-9456

37

From: bj hedahl
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 7:20:50 AM

Dear WDFW

MORALS or MONEY; what runs this country and YOUR life??

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

bj hedahl
333
seattle, WA 98115

38

From: Elizabeth Stucki
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Friday, May 14, 2010 12:07:36 AM

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Elizabeth Stucki
517 carlyon ave se
Olympia, WA 98501-3412

39

From: wes Gallaugher
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 10:44:44 PM

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

wes Gallaugher
654 5th Ave S
Unit 103
Edmonds, WA 98020

46

From: Heather Grube
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 9:14:09 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Heather Grube
9559 Palatine Ave N
Seattle, WA 98103

41

From: stephanie colony
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 8:43:25 PM

Dear WDFW

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stephanie colony
1822 38th Ave. E.
Seattle, WA 98112

42

From: Jenny Konway
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 8:32:57 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jenny Konway
955 NW 62nd St.
Seattle, WA 98107

43

From: Jean Pauley
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 8:10:41 PM

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jean Pauley
242 32nd Ave
Seattle, WA 98122

44

From: Jenny Clark
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 7:14:20 PM

Dear WDFW

I live in the Puget Sound Region and love the beautiful outdoors and all of the wildlife and sealife that it encompases. I am an avid birder and have voluntered my time at the Seattle Aquarium.

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Jenny Clark
1516 243RD PL SE
Bothell, WA 98021

45

From: Brenda Michaels
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Tuesday, May 18, 2010 12:16:35 PM

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Brenda Michaels
15617 258th Pl. SE
Issaquah, WA 98027

46

From: Jana Hobbs
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 19, 2010 9:24:29 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jana Hobbs
13506 NE 66th ST
Kirkland, WA 98033

47

From: David and Ann Cordero
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 20, 2010 10:00:25 AM

Dear Dept of Fish and Wildlife

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David and Ann Cordero
2814 Lilac Street
Longview, WA 98632

From: Dan Kuperberg
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 20, 2010 11:31:49 AM

Dear Dept of Fish and Wildlife

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Dan Kuperberg
223 white Ave.
Winthrop, WA 98862

49

From: Maritza S Mera
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Sunday, May 23, 2010 10:33:57 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Maritza S Mera
91 Pine St Apt 32
Seattle, WA 98101

50

From: Ken Benoit
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 2:20:43 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Ken Benoit
15721 44th Ave W
Lynnwood, WA 98087

51

From: Cal McAllister
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 4:12:35 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Cal McAllister
4505 37th Ave NE
Seattle, WA 98105

From: John Woolley
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 3:08:28 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

John Woolley
president, Olympic Forest Coalition
1606 E. Sequim Bay Rd.
Sequim, WA 98382-7649

RECEIVED
DEC 17 2009

11

53

NORTHWEST STRAITS
marine conservation initiative

December 10, 2009

Mr. Phil Anderson, Director
Washington Department of Fish and Wildlife
600 Capital Way N
Olympia, WA 98501

RE: Northwest Straits Commission comments on draft Puget Sound Rockfish Conservation Plan

Dear Phil:

Thank you for the opportunity to provide comments on the draft Puget Sound Rockfish Conservation Plan. The Northwest Straits Commission and seven Marine Resources Committees provide a local approach to marine conservation and restoration in the Northwest Straits region of Puget Sound. We strive to protect and restore the marine waters, habitats, and species of the Northwest Straits region to achieve ecosystem health. Many of our projects have focused specifically on rockfish protection and sharing educational information to the public about their declining status. The Northwest Straits Commission appreciates your careful consideration of our comments and recommendations.

County Marine Resources Committees
Clallam
Island
Jefferson
San Juan
Skagit
Snohomish
Whatcom
In Cooperation with Participating Tribal Co-Managers

Our comments are focused on the Range of Actions proposed for the eight policy categories:

Natural Production – We support aggressive protection of existing rockfish populations and promotion of their natural production and recovery. Protection of natural populations avoids problems inherent in artificial enhancement and is likely to be more cost effective than artificial enhancement. We support Alternative 1 and strongly recommend "improving regulatory enforcement" as an additional means to implement this strategy.

Habitat– We recommend aggressive protection of natural rockfish habitat and support the development of spatially-explicit management strategies that are based on available science. We recognize the importance of protecting nursery areas as well as habitats used by older, reproductively mature females.

The Northwest Straits Marine Conservation Initiative is currently working to remove 90% of the derelict fishing nets in Puget Sound. We expect that this project will restore over 600 acres of natural marine habitat. This action will have a direct benefit to rockfish species that does not appear to be

Northwest Straits Commission
10441 Bayview-Edison Road
Mount Vernon, WA 98273

phone: 360.428.1064
web: www.nwstraits.org

JH 12/21

included in the current SEPA analysis. We believe that derelict fishing nets in water deeper than we currently work (below 100 ft) may be causing significant damage to several rockfish populations of concern, and we will soon begin seeking funds to operate in these increased depths. We would like to work with WDFW to factor in the benefits of the derelict gear removal project and minimize the impact of derelict fishing gear to marine species and habitats in the future.

Fishery Management – We support Alternative 1 and recommend that it be revised to include specific implementation strategies.

Ecosystem – We support the restoration of all rockfish species to fulfill their natural role in the ecosystem. Although it is likely that activities aimed at restoring the function of some rockfish species will benefit additional species, Alternative 3 is a weak policy choice. The NWSC recommends a more pro-active policy such as Alternative 2.

Monitoring, Evaluation, and Adaptive Management – We support Alternative 2 and encourage the Department to focus monitoring on the species of highest concern in order to obtain reliable data that can inform management.

Research – We support Alternative 2 and encourage the Department to focus on key species. We would like to partner with the Department to determine the benefit our derelict fishing net removal project has on rockfish species. Our current analytical capacity is limited, but we expect that the removal of 3000 derelict nets by the end of 2010 will have significant positive effects.

Outreach and education – We support Alternative 1 and we offer to partner with the Department to expand educational efforts to diverse groups of people about rockfish. The Northwest Straits Commission provides funding and coordination to the seven Marine Resources Committees (MRCs) in northern Puget Sound and can serve as a point of contact for these MRCs to disseminate rockfish conservation information to the public.

Enhancement - We are concerned that the use of artificial reefs will not achieve recovery objectives. There are no data suggesting that rockfish species in Puget Sound are habitat limited. Overfishing, not habitat loss, is the primary cause of the observed declines in rockfish abundance (WDFW SEPA analysis report pg. 27). Consequently, we consider it unlikely that recovery from overfishing can be accomplished by the addition of artificial habitat. Furthermore, there is little scientific evidence that construction of artificial reefs will increase rockfish abundance, although apparent increases could be observed due to redistribution of fish from natural to artificial reefs. We recommend that financial resources be directed towards protection of existing populations and habitats.

We recommend hatcheries be used only for populations that cannot otherwise be naturally restored. Hatcheries are expensive. They can cause the loss of genetic diversity and evolutionary potential and increase the propensity for disease introduction and transmission. Hatchery fish can also alter food-web and other ecosystem processes. Consequently, we question whether the use of hatcheries as a "feel-good" strategy provides any real benefit to wild populations. We believe that at this time, the status of rockfish populations does not merit hatchery production, and we recommend that WDFW allocate its limited resources to better protection of existing populations.

Northwest Straits Commission
10441 Bayview-Edison Road
Mount Vernon, WA 98273

phone: 360.428.1064
web: www.nwstraits.org

We are concerned that no alternative includes the option for "no artificial reefs" and "no hatcheries" in the Enhancement category. This seems to be in conflict with WDFW's own scientific research. We strongly encourage WDFW to add and adopt an alternative that does not rely on artificial reefs and hatcheries as a means of enhancement.

We appreciate the considerable effort the Department has spent on the draft Puget Sound Rockfish Conservation Plan. The Plan must provide an important step forward to address the many challenges facing rockfish in Puget Sound, but it will require some changes to get there. We look forward to working with WDFW and the rockfish advisory group in the coming months.

Sincerely,

Ginny Broadhurst
Director, Northwest Straits Commission

Jonathan White
Chair, Northwest Straits Commission

Northwest Straits Commission
10441 Bayview-Edison Road
Mount Vernon, WA 98273

phone: 360.428.1064
web: www.nwstraits.org

54

From: Susan Schimling
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 2:55:30 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Susan Schimling
3109 N 15th Street
Tacoma, WA 98406

55

From: Ramona Holmes
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 2:08:53 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Ramona Holmes
1831 N. 52nd
Seattle, WA 98103

56

From: Wanda Cucinotta
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 10:20:34 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Wanda Cucinotta
2303 Tuttle Lane
Lummi Island, WA 98262

57

From: Jack Stewart
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 10:20:05 AM

Dear WDFW

As a passionate observer of sea birds, father of sons who are passionate anglers, and one who loves to row and sail my non-motorized wooden boat on the Puget Sound, I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jack Stewart
18002 Thorsen Rd. SW
Vashon, WA 98070

From: Richard Wood
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 9:56:20 AM

58

Dear WDFW

I am a lifelong sports fisherman and have personally noticed a drastic decline in Puget Sound rockfish in recent years. This resource must be protected and enhanced.

I strongly support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Richard Wood
5205 Butterworth Road
Mercer Island, WA 98040

From: Carole Heine
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 9:48:10 AM

59

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Carole Heine
9921 Garons VW Ln NW
Silverdale, WA 98383

66

From: Jessica Vaughan
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 8:41:09 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jessica Vaughan
1408 E Union St
#612
Seattle, WA 98122

61

From: Diane Sullivan
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 8:20:57 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Diane Sullivan
1231 SW Kalama Loop
Oak Harbor, WA 98277

62

From: Margot Haggard
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 8:19:38 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Margot Haggard
1401 5th Ave W. #203
Seattle, WA 98119

63

From: Lynn Edwards
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 8:18:47 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The plan provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports the concept that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Lynn Edwards
531 N 70th St
Seattle, WA 98103

64

From: Jerry Broadbent
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 8:07:19 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jerry Broadbent
410 S Main/ PO Box 146
Bucoda, WA 98530-0146

65

From: John Rose
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 8:02:45 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS).

I have fond memories of bottom fishing when I was a child, but as I have learned more about the life cycles of rockfish and the serious threat to the species I am supportive of strong measures to restore their health.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

John Rose
709 W. Blaine
Seattle, WA 98119

From: Donald Davidson
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 7:44:15 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Donald Davidson
2741 62nd Ave. NW
Olympia, WA 98502

67

From: Matt Schneider
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 5:52:56 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Matt Schneider
6739 36th Ave SW
Seattle, WA 98126

64

From: Tina Mulcahy
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 4:48:51 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Tina Mulcahy
24219 15th PL SE
Bothell, WA 98021

69

From: Anita Das
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 2:54:09 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Anita Das
9522 49th Ave NE
Seattle, WA 98115

76

From: Carole Richmond
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 1:35:16 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

The WDFW should use the precautionary principle before allowing any fish species to be fished. I knew rockfish were very slow to reproduce years ago and should not be fished. This has been found out in other fisheries. I keep seeing rockfish served in retaurants and ask the managers not to serve it, but as long as it's "legal," they will. Only WDFW can prevent this over-fishing. Please protect these fish immediately.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Carole Richmond
3003 Langridge Loop NW
Olympia, WA 98502

71

From: Victoria Beschenbossel
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 1:18:42 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Victoria Beschenbossel
23401 48th Ave W #6
MLT, WA 98043

72

From: Jane Hadley
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Thursday, May 13, 2010 12:36:33 AM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jane Hadley
1725 30th Ave
Seattle, WA 98122

73

From: Julia Burwell
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 11:22:31 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Julia Burwell
31 Crescent Key
Bellevue, WA 98006

74

From: Colleen Curtis
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 10:54:34 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Colleen Curtis
1520 Chuckanut Crest Drive
Bellingham, WA 98229

75

From: Rory Henneck
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 10:17:20 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Rory Henneck
704 N 41st St
Apt. D107
Seattle, WA 98103

76

From: Mark Schiff
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 10:17:06 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Mark Schiff
PO Box 255
Dupont, WA 98327

77

From: Todd Shuster
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 10:04:21 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

If a closure of all fishing in rockfish habitat is impossible I would like to suggest limiting fishing to 60' or less. This would give the fish a significantly higher chance of survival after release compared with the 120' limit imposed for this fishing season.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Todd Shuster
1842 Governor Rd.
Bellingham, WA 98229

78

From: Laura Finkelstein
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 9:55:51 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Laura Finkelstein
PO Box 19312
Seattle, WA 98109

79

From: Melissa Britton
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 9:32:22 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Melissa Britton
12736 NE 116th ST
Kirkland, WA 98034

80

From: Susan Blake
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 9:21:35 PM

Dear WDFW

As a lifelong Seattlite, I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Susan Blake
8023 S 113th St
Seattle, WA 98178

From: Suzanne Grant
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 9:03:53 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Suzanne Grant
2723 4th Ave W
Seattle, WA 98119-2336

82

From: Mark Evans
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 8:54:40 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Mark Evans
12632 NE 157th Street
Woodinville, WA 98072

From: Brian Sullivan
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 8:51:23 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Brian Sullivan
7220 99th Ave SW
lakewood, WA 98498

84

From: Chas Dreyfus
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 8:49:06 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Chas Dreyfus
2608 239th Ave SE
Sammamish, WA 98075

85

From: Allison Ciancibelli
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 8:41:17 PM

Dear WDFW

I am an avid birder, and I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Allison Ciancibelli
240 Twisp River Rd.
240 Twisp River Rd.
Twisp, WA 98856

From: Joseph and Diane Williams
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 8:39:38 PM

Dear WDFW

We are concerned about the rockfish recovery in our area. We therefore support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

We look forward to learning that the correct steps have been taken here to protect this important fish. Thanks.

Joseph and Diane Williams
3880 Stikes Drive, SE
Lacey, WA 98503-8207

From: Penny Derleth
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 8:23:18 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Penny Derleth
PO Box 421
Deer Park, WA 99006

From: Diane Inman
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 8:20:47 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

If we pay attention now, we may be able to impact the future in a way that makes us proud of the decisions we make today.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Diane Inman

Diane Inman
9610 SW 116th ST
Vashon, WA 98070

From: Penny Olson
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 7:58:15 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Penny Olson
2840 139TH AVE SE APT 14
Bellevue, WA 98005

90

From: Deb Casso
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 8:18:28 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Deb Casso
6832 20th ave ne
Seattle, WA 98115

91

From: Joanne Olsen
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 8:06:51 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Joanne Olsen
335 NW 50th St.
Seattle, WA 98107

From:	Sarah Thurmond
To:	SEPADesk2 (DFW);
Subject:	Puget Sound Rockfish Conservation Plan DEIS
Date:	Wednesday, May 12, 2010 7:44:46 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Sarah Thurmond
18507 71st ave ne
kenmore, WA 98028

93

From: Sallie Teutsch
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 7:41:59 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Sallie Teutsch
1961 26th ave e
seattle, WA 98112-3015

94

From: Stuart Mork
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 7:22:57 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

AS UNPLEASANT AS IT WILL BE, WE MUST DO WHATEVER IT TAKES TO RESTORE ROCKFISH POPULATIONS.

Stuart Mork
7710 31st Ave NW
Seattle, WA 98117

95

From: Carolyn Savage
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 7:33:49 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Carolyn Savage
9805 Johnson Point Loop NE
Olympia, WA 98516

From: Robert Crowder
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 7:16:26 PM

91

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Robert Crowder
5624 NW 304th Street
PO Box 489
Ridgefield, WA 98642-0489

97

From: Joseph Bowen
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 7:14:30 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Joseph Bowen
130 W Gilman Ave
Arlington, WA 98223

99

From: Steve Bailey
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 7:03:01 PM

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Steve Bailey
1601 H St
Apt 202
Bellingham, WA 98225-3060

99

From: Geoff Briggs
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 6:52:36 PM

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Geoff Briggs
8404 31st Ave NE
Seattle, WA 98115

From: anne Hartley
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 6:52:15 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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anne Hartley
370 Cottage Lane
Langley, WA 98260-8663

101

From: Karen Waite
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 6:51:22 PM

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Karen Waite
6404 East Blvd NE
Bremerton, WA 98311

102

From: Ildiko papp
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 6:51:15 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Ildiko papp
3401 59th Ave SW
Seattle
Seattle, WA 98116

From: A.E. White
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 6:44:40 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

A.E. White
2330 - 43rd ave east
Seattle, WA 98112

104

From: diana cardiff
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 6:31:19 PM

Dear WDFW

I am a volunteer and part time employee at the Seattle Aquarium. I have learned a lot about many fishes and the rockfish is quite and interesting and unique fish. Just the fact that some rockfish live to be 100 years old is astounding!

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

diana cardiff
718 4th ave n
seattle, WA 98109

105

From: Sharon Parshall
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 6:24:46 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Sharon Parshall
PO Box 593
Fall City, WA 98024

106

From: mary ann kirsling
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 6:21:52 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

mary ann kirsling
p.o. box 3063
Pasco, WA 99302

107

From: Jessica Klein
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 6:14:38 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jessica Klein
517 North 75th Street
Seattle, WA 98103

From: Nanct Hahn
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 6:12:51 PM

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Nanct Hahn
16093 Cassie Place NW
Poulsbo, WA 98370

109

From: Alexandra Klug
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 5:59:14 PM

Dear WDFW

Hi! I'm a student at Evergreen State College, and up until now-I always wished I was a rockfish! That, however, is neither here nor there. The reason I really hope you're reading this is so I can let you know how important I think supporting the Rockfish Conservation Plan is! . We can easily keep these guys around, and not further endanger other species along the way, so why not? Hope everyone's having a good afternoon. GO ROCKFISH!

Alexandra Klug
1714 evergreen park court sw apt a3
olympia, WA 98502

110

From: samuel chamberlain
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 5:58:25 PM

Dear WDFW

I am currently a science teacher and volunteer at the Seattle Aquarium. I have also done a lot of marine science education. I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

samuel chamberlain
555 N. 105th St. #401
Seattle, WA 98133

From: Esther B. Wolf
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 5:53:20 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Esther B. Wolf
4009 30 Ave. W.
Seattle, WA 98199

112

From: Emily Bishton
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 5:42:29 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Emily Bishton
5257 39th Ave NE
Seattle, WA 98105

113

From: Kim Griffin
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 5:42:15 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Kim Griffin
21330 2nd Ave., S.E.
Bothell, WA 98021

From:	karen dingmon
To:	SEPADesk2 (DFW);
Subject:	Puget Sound Rockfish Conservation Plan DEIS
Date:	Wednesday, May 12, 2010 5:40:16 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

karen dingmon
2610 116th st se
everett, WA 98208

115

From: Michael and Barbara Hill
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 5:25:21 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Michael and Barbara Hill
p.o. box 323
Elbe, WA 98330

1/6

From: David Walseth
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:42:36 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

David Walseth
1919 NE 123rd Ave
Vancouver, WA 98684-5557

117

From: Joseph Harrison
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:31:40 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Joseph Harrison
310 12th Ave E #208
Seattle, WA 98102

118

From: Jodi Broughton
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:37:14 PM

Dear Dept of Fish and Wildlife

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Keeping Puget Sound marine life populations healthy is important to me. I want my neices and nephews to experience the same awe and wonder I did when I first moved here from Texas.

I support the plan, which is the preferred alternative DEIS. The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

Thank you.

Jodi Broughton
1810 I St
Bellingham, WA 98225

119

From: Harry Kirchner
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:40:23 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Harry Kirchner
1530 NW Market St
#506
Seattle, WA 98107

120

From:	chris Alton
To:	SEPADesk2 (DFW);
Subject:	Puget Sound Rockfish Conservation Plan DEIS
Date:	Wednesday, May 12, 2010 2:41:14 PM

Dear WDFW

Hello,
I am an angler that targets Puget Sound Salmon primarily. I have been asked the the "People for Puget Sound" to submit this email. I agree with it but also have other comments to add. I have been involved with this organization since the mid 1980s when I did a report in college that addressed point source pollution in Puget Sound.
The point I want to make is that the Puget Sound area population has exploded. The increased population in this region has greatly affected the quality of water and life in Puget Sound. It is not simply a matter of overfishing. Tons of chemicals are dumped into Puget Sound every year. Storm drains overflow. Oil from our cars, metal compounds from our cars, pesticides from our yards, cleaning products used to clean our cars goes right into the Sound from our streets. The best way to address this is to EDUCATE people about what they dump into the streets and on their lawns, and easing our dependence on automobiles that burn OIL. A good example is the street i grew up on in lower Ballard. Photos from the 1970s and 1980s show a handful of cars parked on the street. We would play daily in the street. Now this same street is parked up entirely on both sides 24hrs a day! Another example is the ignorance of my neighbors who spray pesticides such as ROUND UP on the weeds in their driveway and lawn. This is ignorance or simply putting on blinders (selective hearing/laziness because it is too much work to bend over and pull the weeds up by hand).People should be aware of how harmful these chemicals are to the environment and where these chemicals go the first time it rains after they apply them.

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Chris Alton

chris Alton
6549 6th Ave
Seattle, WA 98117

121

From: Heather Bugenig
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:50:50 PM

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Heather Bugenig
8316 60th Lane SE
Lacey, WA 98513

From: Claire Mikalson
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:49:31 PM

122

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Claire Mikalson
24550 Dockton Rd SW
Vashon, WA 98070

From: Kathleen Wolfe
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:48:14 PM

123

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Kathleen Wolfe
28701 6th Pl S #2
Des Moines, WA 98198

From: Rand Guthrie
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:47:34 PM

121

Dear Dept of Fish and Wildlife

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Rand Guthrie
7102 77th ave se
Snohomish, WA 98290

1276

From: Julie Lombardo
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:51:23 PM

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Julie Lombardo
1130 15th Ave East
SEATTLE, WA 98112

127

From: Rein Attemann
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:03:52 PM

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Rein Attemann
316 NW 86th st
Seattle
Seattle, WA 98117

1246

From: Glen Carroll
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:02:26 PM

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Glen Carroll
6455 S. 127th Pl.
Seattle, WA 98178-3634

From: Christopher Moench
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:59:00 PM

179

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Christopher Moench
1896 Yew Street Road
Bellingham, WA 98229

From: Sean Quinlan
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:57:49 PM

130

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Sean Quinlan
12205 269th Way NE
Duvall, WA 98019-8219

From: alfred benedetti
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:54:00 PM

131

Dear WDFW

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

alfred benedetti
3024 133rd pl se
mill creek, WA 98012

1372

From: Joann Edmonds-Rodgers
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:53:33 PM

Dear Dept of Fish and Wildlife

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Joann Edmonds-Rodgers
8109 8th Ave SW
Seattle, WA 98106

From: Gerry Milliken
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:51:57 PM

123

Dear Dept of Fish and Wildlife

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Gerry Milliken
PO Box 1880
Oroville, WA 98844

From: Lindsay Cummings
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:48:18 PM

13-1

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Lindsay Cummings
PO Box 23188
Seattle, WA 98102

135

From: Annie Honrath
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:29:43 PM

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Annie Honrath
412 30th ave e
Seattle, WA 98112

From: Adam myers
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:26:59 PM

136

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Come on guys, do what is right. Don't wiat until the entire sound and surrounding coastal area has been fished out before you get a spine.

Adam myers
11507 26th ave NE unit B
Seattle, WA 98125

137

From: Stella Pirotte
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:23:02 PM

Dear WDFW

I am a volunteer naturalist at a local park where I lead beach programs for the public. I also grew up fishing salmon, shrimp and crab in the Puget Sound. I ask that you please kindly read the below proposal and consider a fishing ban on large areas of the Sound to save the unique, beautiful and now endangered Puget Sound Rockfish from extinction.

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Stella Pirotte
9006 Phinney Ave N
Seattle, WA 98103

134

From: Mali Munch
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:18:18 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Mali Munch
7336 21st Ave NE
Seattle, WA 98115

From: joseph herrin
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:16:15 PM

139

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

joseph herrin
5040 47th ave NE
seattle, WA 98105

140

From: Kevin Glasgow
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 4:12:43 PM

Dear WDFW

I strongly support establishing marine protected areas.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the scale and location of the marine reserve network necessary to accomplish recovery.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Kevin Glasgow
3830 Biscay St. NW
Olympia, WA 98502

From: Lydia Garvey
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 4:08:56 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Lydia Garvey
429 S 24th
Clinton, OK 73601

142

From: Adina Parsley
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 4:05:24 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Adina Parsley
709 W Wiser Lake Rd
Ferndale, WA 98248

143

From: Laura Walters
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 4:01:01 PM

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Laura Walters
12120 SE 196 Street
Renton, WA 98058

124

From: Doug Balcom
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:55:59 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Doug Balcom
1730 NE 92nd St.
Seattle, WA 98115

From: Lindsay Cummings
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:48:18 PM

145

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Lindsay Cummings
PO Box 23188
Seattle, WA 98102

From: Chris Pollina
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 4:13:40 PM

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thanks,
-Chris Pollina

Chris Pollina
4419 Fremont Ave N
Seattle, WA 98103

147

From: Margaret Cuthbert
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 5:10:13 PM

Dear WDFW

As a bird watcher and volunteer working in environmental education, marine citizen science and restoration, I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

I have personally seen the blatant waste of life of these fish used, believe it or not, for fish printing!

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Margaret Cuthbert
15425 Columbia Avenue
White Rock, BC V4B 1K1

147

From: Rebecca Sundberg
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 5:06:46 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Rebecca Sundberg
830 Gleason Lane
Langley, WA 98260

From: Elizabeth Anne Sunrise
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 5:00:27 PM

149

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Elizabeth Anne Sunrise
606 Devoe St. SE
Olympia, WA 98501-2025

150

From: Susan Birkeland
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 4:57:32 PM

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Susan Birkeland
PO Box 9306
Apt. 503
Seattle, WA 98109

From:	Barbara Wood
To:	SEPADesk2 (DFW);
Subject:	Puget Sound Rockfish Conservation Plan DEIS
Date:	Wednesday, May 12, 2010 4:41:37 PM

151

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Barbara Wood
1926 SE Richmond Lane
Port Orchard, WA 98367

152

From: Sean Kelly
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 4:31:18 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Sean Kelly
4016 8th Avenue NE
506
Seattle, WA 98105

153

From: Meg Rafferty
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 5:15:32 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Meg Rafferty
80th Ave. Se
Mercer Island, WA 98040

From: Nicole Killebrew
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:13:22 PM

154

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Nicole Killebrew
8842 20th Ave SW
Seattle, WA 98106

From: Christopher Lawrence
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:12:49 PM

154

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Christopher Lawrence
19 East 32nd Avenue
Spokane, WA 99203

From: David Richard
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 3:12:28 PM

156

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

David Richard
1009 W. Blaine
Seattle, WA 98119

From: Jodi Broughton
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:37:12 PM

157

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Keeping Puget Sound marine life populations healthy is important to me. I want my neices and nephews to experience the same awe and wonder I did when I first moved here from Texas.

I support the plan, which is the preferred alternative DEIS. The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

Thank you.

Jodi Broughton
1810 I St
Bellingham, WA 98225

From: Bethany Stackhouse
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:32:54 PM

158

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Bethany Stackhouse
1010 taylor ave n #3
Seattle, WA 98109

From: Joseph Harrison
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:31:40 PM

159

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Joseph Harrison
310 12th Ave E #208
Seattle, WA 98102

From: Nate Wood
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:30:26 PM

160

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Nate Wood
8421 SE 33rd Place
Mercer Island, WA 98040

From: Michael Thompson
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:26:08 PM

161

Dear WDFW

Hi There,

The message below was provided to me by my friends at the people for puget sound. As an avid birder and amateur wildlife photographer, the health of the environment in all of western Washington is vitally important to my quality of life and so I strongly support all measures taken to protect any endangered species in our area, including the rockfish. Thanks for all you do on a daily basis to help maintain the health of our local ecosystems.

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Michael Thompson
21725 NE 136th Place
Woodinville, WA 98077

162

From: Ellen Blackstone
To: SEPADesk (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:25:45 PM

Dear Dept of Fish and Wildlife

I love fish in my diet, and hope to continue to enjoy it.

Therefore, I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Ellen Blackstone
8203 38th Avenue NE
Seattle, WA 98115

From: Kristin Pence
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:23:17 PM

163

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Kristin Pence
1236 miller Ave. NE
Olympia, WA 98506

From: Alixine Sasonoff
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:23:12 PM

124

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Alixine Sasonoff
3701 SW 3 Tree Point lane
Burien, WA 98166

From: kyana jones
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:20:52 PM

165

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

kyana jones
19355 53rd ave ne
lake forest park, WA 98155

166

From: Paula Shafransky
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:19:06 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Paula Shafransky
22461 Prairie Road
Sedro Woolley, WA 98284

167

From: Elizabeth Gorton
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:19:01 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Elizabeth Gorton
2026 East Libra Drive
Tempe, AZ 85283

From: Elena Kuo-Harrison
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:17:23 PM

164

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Elena Kuo-Harrison
7346 Steamboat Island Rd NW
Olympia, WA 98502

169

From: Tiffany Greenleaf
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:16:59 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Tiffany Greenleaf
4912 University View Pl. NE
Seattle, WA 98105

170

From: amy tsui
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:16:45 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

amy tsui
2307 2nd ave N
seattle, WA 98109

171

From: Lauren Miheli
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:16:42 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Lauren Miheli
442 NE Maple Leaf PL
APT 3
Seattle, WA 98115

172

From: Jeanne-Marie Peterson
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:15:50 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jeanne-Marie Peterson
238 Ephrata Ave
Soap Lake, WA 98851-9605

173

From: Peter Sodt
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:14:37 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

It is my desire to maintain a healthy Puget Sound, including the resident species. This is a win for the citizens of Washington.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Peter Sodt
324 Alta Via Drive
Camano Island, WA 98282

From: Marilyn Hall
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:13:58 PM

174

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for listening to my comment on the Puget Sound Rockfish Conservation Plan.

Marilyn Hall
10527 NE 148th Ct
Bothell, WA 98011

From: Curt Puddicombe
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:09:47 PM

175

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Curt Puddicombe
9025 32nd Ave NE
Seattle, WA 98115

176

From: Jack Stansfield
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:08:17 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jack Stansfield
16314 62nd Ave. NW
Stanwood, WA 98292

177

From: Melanie Kenoyer
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:06:54 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Melanie Kenoyer
708 W 24th St
Vancouver, WA 98660

174

From: Del E. Domke
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Wednesday, May 12, 2010 2:04:54 PM

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Del E. Domke
16142 N.E. 15th. Street
Bellevue, WA 98008-2711

From: SHARY BOZIED
To: SEPADesk (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:31:47 PM

179

Dear Dept of Fish and Wildlife

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

SHARY BOZIED
1950 ALASKAN WAY
SEATTLE, WA 98101

From: Herbert Curl
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:30:35 PM

180

Dear WDFW

I wholeheartedly support the proposed Puget Sound Rockfish Conservation Plan. This action is long overdue, as in 50 years overdue, at least.

The preferred alternative in the draft Environmental Impact Statement (DEIS) should be chosen. The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

There should be an immediate ban on fishing for rockfish and a penalty for possession. This is easily accomplished by normal regulatory processes.
The best way to recover long-lived, late-maturing species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations are not the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

I was a former Fisheries Oceanography Coordinator for the National Marine Fisheries Service and have seen this problem with other similar species.

Herbert Curl
4741 18th Ave.NE
Seattle, WA 98105

181

From: Jamie Wine
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:28:26 PM

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Jamie Wine
4120 Palatine Ave N
Seattle, WA 98103

182

From: Patricia Perry
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:27:16 PM

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

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Patricia Perry
14135 56th ave s
Tukwila, WA 98168

From: Tom Stapp
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:22:14 PM

183

Dear WDFW

Thank you for the opportunity to comment on the Puget Sound Rockfish Conservation Plan.

This initiative is a strong step towards supporting the overall health of Puget Sound. The rockfish i remember catching in my youth, i now realize are critical members of the ecosystem that is still there, but showing signs of impact. The fact that the habitats are still viable, means this species can recover if given the chance.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

I may not be fishing the areas in my lifetime but i can tell my kids what i did. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Tom Stapp
16207 81st Place NE
Kenmore, WA 98028

184

From: Dawn Flannum
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:21:30 PM

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Dawn Flannum
23790 SE 7th Place
Sammamish, WA 98074

From: Mr. Shelley Dahlgren, PhD
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:20:17 PM

194

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Mr. Shelley Dahlgren, PhD
4449 242nd Ave. S. E.
Issaquah, WA 98029

186

From: Aditee Kumthekar
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:19:09 PM

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Aditee Kumthekar
12008 NE 84th Ln
Kirkland, WA 98033

1467

From: Elena Kuo-Harrison
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:16:44 PM

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

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Elena Kuo-Harrison
7346 Steamboat Island Rd NW
Olympia, WA 98502

From: Tonda Kiffin
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:16:14 PM

184

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

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Tonda Kiffin
7329 23rd Ave NE
Seattle, WA 98115

199

From: Sherry Manning
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:15:23 PM

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Sherry Manning
34827 SE Moffat Street
Snoqualmie, WA 98065

190

From: Gabriela Carvalho
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:14:31 PM

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

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Gabriela Carvalho
1915 E Roy St
Seattle, WA 98112

From: Robert Blumenthal
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:11:38 PM

191

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Robert Blumenthal
2812 NE 62nd St.
Seattle, WA 98115

From: melodie martin
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:07:51 PM

192

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

melodie martin
2339 11th ave east
seattle, WA 98102

193

From: Ellen Watson
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:07:08 PM

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Ellen Watson
14321 74th Ave Ct E
Puyallup, WA 98373

194

From: Dan Halos
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:05:43 PM

Dear WDFW

I grew up fishing for rockfish and have been saddened by the drastic decrease in the population over the years. This is something I'd like my children to be able to do and want to do whatever it takes to allow their populations to recover.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Dan Halos
2301 NE Blakeley St. #202
Seattle, WA 98105

195

From: Diana Smith
To: SEPADesk2 (DFW);
Subject: I support the Rockfish Conservation Plan
Date: Wednesday, May 12, 2010 2:04:39 PM

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Diana Smith
1521 NE 100th
Seattle, VA 98125

196

From: Dean Hoshizaki [deanhosh@hotmail.com]
Sent: Thursday, April 08, 2010 10:51 AM
To: SEPADesk2 (DFW)
Subject: Comments on Rockfish regulations: Require venting.

Hello,

Surprisingly, no one has mentioned the approach Florida takes on bottom fish.

It is regulated that all boats need to have a bladder deflation tool. It is a simple tool, in expensive and easy to use.
More information is here edis.ifas.ufl.edu/pdffiles/SG/SG07900.pdf

The argument for venting is as follows:

Unless all fishing is stopped, Rockfish will be a part of the by catch, regardless of limit restrictions.
Releasing deep water caught fish have a high mortality rate.

Proposal:
Require venting tools.
Manage the rock fish by species. Some species are much more plentiful than others.
Manage the rock fish by marine areas at a finer granluation. South Puget sound is very different from Area 7-5 and also very different from 4-1.

Thanks for your consideration.

Dean Hoshizaki

197

From: itsme98335@aol.com
Sent: Tuesday, April 06, 2010 5:55 PM
To: SEPADesk2 (DFW)
Subject: Comments on revised Puget Sound rockfish conservation plan

My comment goes to the basics of any plan. With out a good and valid enforcement agency in place there is no hope. The seat belt regulation is a good example. We shown films and tried to education the young and old drivers on the need. Its was not until the governor said click it or get ticketed that everyone because aware. I enjoy the natural resources of this state but hold very little hope that any of it will be available in ten years. When I go squiding I see people taking buckets of squid to their car and coming back for more, shrimping, claiming, oysters, and rockfish and all the same. Ask most fisherman about the abuses they see. Get more enforcement agent(we have one third less enforcement agent now than we had two years ago), set mandatory sentences so judges who have no ideas of the importance of this resource don't just dismiss this as one less unimportant fish. Perhaps setting up a special court with a judge that is knowledgeable and accountable to say the Native Americans, Sport Fishermen, and Commercial Fishermen.

Bill Rehe, Sr.
Gig Harbor, WA
253-225-1490

From: James Farber [jffsr@iinet.com]
Sent: Tuesday, April 06, 2010 9:28 PM
To: SEPADesk2 (DFW)
Subject: Consrvation Plan

194

Why bother??????? You put a three year "plan" into effect and one year later you are changing it for a different plan. I was taught to plan my work and work my plan not make another plan. J

199

From: Larry Ohman [landrohman@yahoo.com]
Sent: Wednesday, April 07, 2010 11:08 AM
To: SEPADesk2 (DFW)
Subject: Puget Sound Rockfish Conservation Plan DEIS - L. Ohman

Hi,

After reading the Conservation Plan I must say I am impressed. It is very well researched and thought out. I was pleased to see restrictions placed on commercial practices that damage habitat. I was disappointed to learn that venting doesn't improve the survival rate of released fish as much as I thought it did. Improving/sustaining habitat and hatchery programs for rockfish are very good ideas in my opinion.
Here are a few thoughts I have that may be beneficial:

The Neah Bay region differs so much from the Northern and Southern regions that it should be regulated different from them. Maybe it's the abundant habitat, amount of bait fish or close proximity to the ocean that seems to set it apart from the other regions regarding quantity of rockfish (especially black rockfish).

In area 4 I would propose:

1.) Requiring the use of barbless hooks and no use of treble hooks.
2.) Leaving the daily limit at 10 rockfish but requiring that 6 or 7 must be BLACK rockfish.
3.) Impose restrictions as you see fit on divers.
4.) If not already in place in area 4, ensure commercial fishing practices don't allow gear that damages habitat, can easily become derelict fishing gear or has a high mortality rate for untargeted species.
5.) Add a note to the sport fishing rules regarding returning bottom fish rapidly to reduce the mortality rate if this practice is proven more successfull than "venting".

One final note to pass on for me regarding licensing and the date the new rules are available for review...
I would push for the sport fishing rules pamplet to be issued before the new fishing license is required. Especially if there are rule changes from the previous year. If the rules are the same as the previous year, it's no big deal. The present date for fishing license renewal is a good one. However, not knowing what the rules changes are when you buy the license is comparable to gambling...

Thanks for your time and keep up the good work,
Larry Ohman

200

From: ken [kynnyth@tx3.com]
Sent: Thursday, April 08, 2010 7:28 PM
To: SEPADesk (DFW)
Subject: Revised Draft Puget Sound Rockfish Conservation Plan - K. Buckner

After reading the revised plan for rockfish conservation I prefer the conservative approach is implemented in most cases. I prefer Rockfish Conservation Area's (RCA's) in all cases. I do not like the idea of Marine Preserves. With the money that fisherman pay for licenses we should get preferred treatment. I do not see divers paying even a tiny bit in comparison to fishermen.
Install the artificial reefs and let the rockfish and ling cod thrive. Years ago when the trawlers came through thery destroyed most of the natural reefs, then clams and other bivalves moved in. Installing artificial reefs is only returning the Sound to its original configuration.
Thank you for letting me submit my opinion.

Kenneth R. Buckner

E-mail message checked by Spyware Doctor (7.0.0.514)
Database version: 6.14740
http://www.pctools.com/spyware-doctor-antivirus/

201

From: Sims, Paul P CIV CODE 106 [paul.p.sims@navy.mil]
Sent: Tuesday, April 06, 2010 3:02 PM
To: SEPADesk2 (DFW)
Subject: Rockfish Draft

Read the plan, use of the 2nd alternative looks overall to be the more useful with the exception that alternative 1 should be used in the research area.
NO rearing should be done as long as nets for Bottom fish are allowed in the South region.

NO nets in the South Region, limited netting in the North Region, indicator species controlling nets in the Neah Bay Region

202

From: Larry Ohman [landrohman@yahoo.com]
Sent: Tuesday, April 06, 2010 6:18 PM
To: SEPADesk2 (DFW)
Subject: Rockfish conservation

I would stay with the original plan if I had a say in the matter...
Thanks,
Larry Ohman

203

From: Jim McDonald [mazama90@msn.com]
Sent: Wednesday, April 07, 2010 11:41 AM
To: SEPADesk2 (DFW)
Subject: Rockfish recovery

I support establishment of large marine reserves for the recovery of rockfish.

I do not support habitat restoration or hatchery production since the establishment of large marine reserves will allow for natural habitat restoration and adequate production.

In addtion, there are enough initiatives underway to reduce pollution. We don't need to spend finite resources on a goal that others are already responsible to obtain.

r, Jim McDonald
333 Lewis Avenue
Bremerton, WA 98310

From:	Jeff Juel
To:	SEPADesk2 (DFW);
Subject:	Rockfish Conservation DEIS
Date:	Tuesday, November 10, 2009 10:08:45 AM

Here are my written comments regarding the subject DEIS:

I have more than 40 years of first-hand informal observations of the rockfish population at a site in the San Juan Islands. My parents purchased a one acre parcel of land on Davis Bay at the SW corner of Lopez Island in the summer of 1960. I was born in October 1960. I can honestly tell people that I've been going to the Island since before I was born. I've gone there a couple times a years ever since then - 49 years so far. In fact, I was just up there about a week ago. As a result, I have a long record of first-hand observations with regard to rock fish populations at this location.

Around 1970, I saw the first harbor seal in the bay - how exciting! By 1975 it was not unusual to find a half dozen harbor seals hauled out on the tidally exposed rocks near Buck Island. Buck Island is a bird sanctuary in the bay about a mile row from our property. Back in the 60's, on a few occasions my dad would row the kids out to Buck Island and we'd easily catch three or four rockfish and have them for dinner. I don't remember ever coming back empty handed - until the 70's.

By 1975 it seemed that it was impossible to catch a single rockfish at Buck Island. Around 1985 or so, I took up scuba diving and I dove around Buck Island and I didn't see a single rockfish.

I also remember hearing the dull roar of sea gulls on Buck Island back in the old days. Around the time the seals showed up, the sea gull population went into decline. I haven't seen a sea gull on Buck Island in years - not a one! It's as if they've made the place is off limits. It's very strange. Not only that, but the seal population of the bay is now in the hundreds - and you never see Harbor Seals at their old haul-out at Buck Island anymore. The seals have moved to the rocks farther to the west - Mummy Rocks and Whale Rocks. And now Mummy Rocks are pretty much devoid of rockfish.

The moral of the story is that limiting the human taking of rockfish is pointless if there is a burgeoning population of Harbor Seals. Think about if. The seals are there 365 days of the year, eat nothing but fish, and they have no concept of a limit. What's the point?

Davis Bay has had some human habitation for about 150 years. It's where the first white settlers on Lopez Island made their homestead. I have never observed

commercial bottom fishing or hoards of pleasure boats fishing around Buck Island. It's a pretty quiet little bay. The water in the bay is very clean and well flushed by the tides. Over-fishing and pollution cannot be blamed for the decline. The demise of rockfish at this site correlates with the growing harbor seal population. It seems like an open and shut case.

Attempting to conserve rockfish under these conditions makes about as much sense as advocating that Americans should have fewer children to control the population growth while allowing unlimited immigration. It's insanity.

I predict your efforts will be futile - at least in the short term. At some point something will collapse the harbor seal population - starvation or disease... or maybe the local Killer Whales will solve the problem for us. I've heard that the Killer Whales did a public service w.r.t. the harbor seal population in Hood Canal a few years back. Killer Whale predation of harbor seals - That's the plan I would advocate.

Jeff Juel, PE

From:	jerry
To:	SEPADesk2 (DFW);
cc:	"Bear Holmes";
Subject:	Comment regarding draft Rockfish Management Plan
Date:	Friday, November 06, 2009 10:56:35 AM

305

Comment regarding the draft Rock Fish Management Plan

The current draft Rock Fish Management Plan includes the following provision:

"The construction or use of enhancement techniques to provide or increase fishing opportunities will not be considered."

As a member of the Coastal Conservation Association's, Puget Sound Marine Enhancement Committee, I was assigned to contact the authorities in the states of Florida and Alabama to research what their experience has been with Marine Habitat Enhancement, to include artificial reefs constructed from recycles concrete. Both states have used artificial reefs for decades and uniformly reefs constructed from recycled concrete have been successful both for research and fishing opportunities, and beneficial to the marine environment.

Of course, research will need to be done to here to determine if artificial reefs are beneficial for rock fish recovery, and pose no harm to other marine life and the marine environment. However, if the research here and the experience of other states show that artificial reefs for fishing opportunities are beneficial to marine life and not harmful to the environment, there is no good reason not to permit them for fishing opportunities.

The provision in the Rock Fish Management Plan should be amended to, at least, provide:

"Construction or enhancement techniques will be considered for research and recovery efforts, and construction or enhancement techniques for fishing opportunities will be permitted, if it is shown that they will benefit rock fish recovery and will not be harmful to other marine life or environment."

I can give you the contact information for your counterparts in Florida and Alabama that can provide information about their experience and research regarding the use of recycled concrete for artificial habitat.

Jerry Merritt
Jerryfsh@comcast.net
(360) 866-2064

From:	dm56@aol.com
To:	SEPADesk2 (DFW); digitaldoug@comcast.net; dm56@aol.com;
Subject:	MPA at Neah Bay
Date:	Friday, November 06, 2009 10:30:45 AM

I wish to have my comments placed in the records concerning rules and regulation changes.

I've gone over the map of the proposed area and find that I have several questions and comments that I think are relative to the proposed MPA area at Neah Bay.

First off, I believe that adding this proposal at this time is not fair to others who conformed to the time schedule.

It may be appropriate to address this for a future year.

I haven't fish portions of the proposed area in recent years, but have fished it extensively over 30 years ago both as a sport and commercial hand line jigger.

Much of this area is not heavily fished and does not offer the best rockfish habitat in the region.

Along the shoreline there are areas that hold China Rockfish, Kelp Greenling and some lingcod. Black Rockfish move in and out of the area seasonally.

This would be in the area between Koitlah Point, and out to the Hole in the Wall. There are areas where fishing on the eastside of Tatoosh is productive for Black Rockfish, AKA seabass,

I can see the desirability for Scuba Divers along the shoreline, particularly in sheltered areas on Cape Flattery.

Duncan Rocks is considered one of the best dives in the area according to my daughter and son-in-law who are skilled divers.

There are some tremendous tidal currents in this area that should be considered by both divers and sport fishermen.

Duncan Rock has been one of the most popular landmarks for bottom fishermen offering schools of Black Rockfish, Yellowtail Rockfish frequently caught near the surface.

I would question closing the area around Tatoosh Island and Duncan Rocks to sport fishing as it is sometimes one of the few areas that can be fished

dependent on the weather, particularly the back side of Tatoosh

The actual shoreline along the side of Cape Flattery inside the Strait and east of Tatoosh would offer excellent diving opportunities and unless it has changed since I fished there many years ago is not comparable to other locations, particularly on the open ocean side and down the coastline reachable by sport fishing boats.

Establishing a no bottom fishing zone along the Strait from Koitlah Point to just short of Tatoosh might be desirable for the diving community. I personally would not be opposed to establishment of a no bottom fishing zone along the shoreline inside the Strait, however question establishing it out one and one-half miles from the shoreline.

Most of this offshore area sees little bottom fishing pressure to begin with.

Koitlah Point is a known halibut holding area. Closing bottom fishing there would restrict some opportunities, but would likely effect only a small number of sport fishermen.

This proposal needs time for study and input by fishermen who currently fish the area, charter operators that fish this particular area and scientist who have studied the area before any decisions are to be made.

These are just my personal observations, I would urge people who currently fish this area, or scientist that have studies the bottom fish populations to comment.

Respectfully,

Doug Wilson

From: Natalie Bogues
To: SEPADesk2 (DFW);
Subject: Puget Sound Rock Fish Conservation
Date: Thursday, November 05, 2009 2:59:33 PM

To whom it may concern:

I thoroughly **support the Puget Sound Rock Fish Conservation Plan**. It is a platform for long-term stability of these species and many others, while allowing responsible recreation and fishing to occur.

207

Natalie Bogues
Staff Biologist - Kids' Zone
Point Defiance Zoo & Aquarium
5400 N. Pearl Street
Tacoma, WA 98407
253-404-3647
natalie.bogues@pdza.org

From: BARB HARMON
To: SEPADesk2 (DFW);
Subject: Public Comment Period - Draft Environmental Impact Statementfor the Puget Sound RockfishConservation Plan
Date: Thursday, November 05, 2009 1:11:35 PM

Thank you for the opportunity to comment.

208

My thoughts:

Recreational fishing industry should not be a leading force for decision making.
Recreation should not impact population management or a species survival.

Do restriction until cod populations have recovered (along with educational messaging to go along with regulations).

Make sure the messaging is available when - and before if possible – actions are to be implemented with the clear message that when populations have recovered restrictions will be reduced accordingly.

Barb Harmon
3610 North Gove Street
Tacoma, WA 98407

253-267-8213

From: Ivan Cross
To: SEPADesk2 (DFW);
Subject: Comment on SEPA No. 09063
Date: Monday, November 02, 2009 5:14:13 PM

209

Re: Puget Sound Rockfish Conservation Plan DEIS

Please do not consider rockfish conservation efforts that would at the same time, reduce fishing opportunities for salmon, ling cod and halibut. These fisheries are already limited enough and further restrictions would be a detriment to angler opportunity and business ventures around these fisheries. I would be in favor of rockfish fishing closures in those areas targeted for rebuilding, and making it illegal to have any rockfish in possession. Also, public awareness of proper release techniques for rockfish should be addressed as this would be a benefit to survival of released fish.

I make my living – such as it is – in the boating business and am also an avid fisherman. Please leave salmon, ling cod and halibut alone.

Sincerely,
Ivan Cross
The Merifield Co.
Camano Island, WA
icross@merifield.com
360-387-5888, ext. 2
Member: NMTA

From: Ryan Knowlton
To: SEPADesk2 (DFW);
Subject: Rockfish and seals/sea lions
Date: Sunday, November 01, 2009 4:14:03 PM

210

Dear Sir,

As a lifelong resident of Whatcom County, I recently began fishing again after many years away from the sport. I was pleased to see that salmon are more plentiful, but was dissapointed at the drop in rockfish populations and additional rules in place that don't allow much to be kept. While fishing for other fish we caught several Copper rockfish which had to be released. While we had fished at depths less than 120ft(aware of the barotrauma issue), theres the chance that some of the fish still parished and went to waste.

Another issue that surprised me was the amount of seals and sea lions. Near Orcas Island, where my family has fished point lawrence for many years, a few seals was a normal day in the 80's. This year the same area was swarming with over 40+ seals and sea-lions. It was discouraging to see them surface again and again with large salmon....or one with a full grown copper rockfish, and gulp them whole like an aspirin.

Reading your rockfish conservation plan/report on the website, the math of Seal/Sea-lion rockfish consumption provides some alarming numbers. With the diet percentage of rockfish averaged at 14.5% (12% x 3 and 23% during winter), multiplied by the estimated population of seals and sea lions in puget sound provides an alarming 725,000lbs + consumed annually. This is just shy of the PEAK commercial harvest of rockfish which initially damaged the populations to such extent.

The amount of current recreational harvest is miniscule in respect. Additional fishing restrictions and new manmade habitat's are merely going to better feed an already un-balanced seal and sea lion population. While I like animals and desire every creature to thrive so that my offspring can enjoy their presence, it's obvious by the drop in avg. seal weight stated in the report that there are way too many of these protected animals and that they have "out-eaten" their welcome.

Thank you the opportunity to submit comment,

Ryan Knowlton

21

From: bernie hansen
To: SEPADesk2 (DFW);
Subject: seals
Date: Sunday, November 01, 2009 3:46:25 PM

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the seals are decimating our fishing stock...there should be a bag limit on seals to balance the equation...

From: Ron Robertson
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish
Date: Saturday, October 31, 2009 8:31:52 AM

Hi,
I am very much for bringing back viable rockfish populations to Puget Sound. In the 60s and 70s fishing with my dad these populations were very strong. In those days we seldom saw seals and never saw sea lions. Today these mamals are all over. To the point where the steal fish right off the line as well as eat huge numbers of both rockfish and salmon. Just drift by islands like Bird Rocks and you can smell all the dead fish that have passed thru these preditors. We need to thin down the numbers of these animals, which I believe will go along way to inproving the survival rate of all fishes.
Thanks for the opportunity to respond,

Ron Robertson
Mount Vernon WA

From: John D Festa
To: SEPADesk2 (DFW);
Subject: Commercial fishing on the inland waters
Date: Thursday, October 29, 2009 6:01:30 PM

If you really want to bring back bottom fish in the Puget Sound you must take the commercial nets out. The sport fishermen A) can only bring home the first and only bottom fish they catch. B) It is not worth going out fishing for bottom fish as drag netting in the early 1980's about wiped out the Puget sound bottom fish, and have continued to keep the bottom fish population down.
I know there are still nets that are catching bottom fish as a buy catch in the Puget sound.
I used to catch a lot of bottom fish, as did many of our friends, but since the 1980 99% of sport fishermen have given up on bottom fishing. So where is the sport fisherman pressure coming from?
The commercial fishermen / Indians have destroyed all fisheries, not just bottom fishing. Reason is the Puget Sound waters is a small body of water compared to the Ocean, thus it does not take long to deplete what little is out there. (Like a fish tank half empty, pretty easy to catch the fish in less water).
Sport fisheries is a $2,000,000,000 Washington State revenue source, commercial industry is about $1,000,000 State Revenue source, maybe the Washington Department of Fish & Wild life, Fish Management should take this into consideration when we talk of netting in Puget Sound for any species of fish!
May be is should be limited to a more select fisheries for commercial and Indians, like long lining only.
I know because the commercial fishermen and Indians have to many lobbyists in Olympia there is not much hope for real conservation with-in Puget sound / Washington state when it comes to us or them or for that matter the Puget sound.
Just last year we lost some of our sport fishermen quota to the Shrimp netters off the coast. The Fish and Wild life had to give up some of our quota for a Buy catch for the shrimpers.
This has been going on for years, each year we get our quota cut for some other fisheries, commercial / Indian.

CCA
COASTAL CONSERVATION ASSOCIATION
WASHINGTON

1006 West 11th St.
Vancouver, WA 98660
Tel (877) 255-8772
Fax (877) 255-8774
www.CCAPNW.org

2'1

October 29, 2009

Mr. Phil Anderson, Director
Washington Department of Fish and Wildlife
800 Capitol Way N.
Olympia, WA 98501-1091

Mr. Anderson,

The members of Coastal Conservation Association (CCA) Washington have expressed significant interest in the draft Puget Sound Rockfish Conservation Plan released by the Department on October 19. I am writing on behalf of CCA Washington to request that the Department extend the public review and comment period and schedule additional public meetings to ensure the public fully understands the proposal, its basis in science and the alternatives under consideration.

Coastal Conservation Association is the largest non-profit marine conservation organization in the country. For over thirty years, through its 100,000 members in 17 states, CCA has worked tirelessly to conserve, promote and enhance marine resources. In a little over two years over 5,000 conservation-minded anglers have formed over a dozen local CCA chapters in Washington, including chapters in south, central and north Puget Sound.

The 30-day public review and comment period provided by the Department is not adequate to review and comment on a major proposal of this nature (nearly 100 pages). Recreational fishers would be uniquely impacted by many of the alternatives being proposed, including Marine Protected Areas and fishing restrictions. There is also significant confusion on what is actually being proposed by the Department.

CCA Washington and other local grassroots organizations are primarily comprised of citizen volunteers and require adequate time to review, discuss and provide comment on a proposal of this magnitude. In addition, the technical nature of the plan also compounds the need for additional time to review the science related to Puget Sound rockfish. This requires more than 30 days to provide a coordinated and meaningful response. As a result, CCA respectfully requests the public review period be extended from 30 to 90 days (through and including January 17, 2010).

Meanwhile, the Department's October 19th notice announced four public meetings on the draft plan: one in Mill Creek, one in Friday Harbor, one in Olympia and one in

Port Townsend. For many Puget Sound residents, including those in Kitsap, Whatcom, Skagit and Island counties, the current public comment locations would require significant time and expense to attend, which limits their ability to participate in the public process. Accordingly, CCA Washington believes that additional public meetings should be held in Skagit and Kitsap Counties to ensure the many interested residents in those areas, including members of CCA Washington, have an opportunity to better understand the proposal.

I appreciate your consideration of this request.

Sincerely,

Bryan Irwin, Regional Executive Director
Coastal Conservation Association, Pacific Northwest

cc: WDFW Commission,
Mr. Jim Scott, Fish Program Director

From: Risser, John D
To: SEPADesk2 (DFW);
Subject: Rockfish
Date: Thursday, October 29, 2009 3:10:11 PM
Attachments: SFB1[1].jpg

215

Dear Sirs:
I am Against the Proposed Changes to the Rockfish Fishery in Puget Sound. You are taking away a vast area to sport fishing. The Catch records from your own website show that we do not target the species in excess. In the past bottom trawlers destroyed the bottom of Puget Sound. This year is the first time I have consistently caught True Cod here in the Sound. The bottom trawlers basically wiped out the species in the past. They are now making a come back. Why because the bottom trawlers are not here. Seals and Sea Lions are and you are lowballing their predation on the rockfish.

Kill some Seals and Sea Lions and see if that will improve the fishery. Keep out the bottom trawlers from the sound and Mandate a Releasing devise on any bout that is fishing at a certain depth and deeper Like the one from Shelton products as seen here.

I have bought four so far and have given 3 of them as gifts to my friends that fish. They do work and I have mine setup to use with my downrigger. At 100' down the fish start to swim and you just pull up on the pole and the fish swim off. It Works:
John Risser
Cell 360-631-1076
CCA, PSA member along with being on Bloodydecks, Gamefishin, Piscatorial Pursuits, and Ifish Forums

SFD™

From: Ralph Raymond
To: SEPADesk2 (DFW);
Subject: Comment - Draft Puget Sound Rockfish Conservation Plan
Date: Thursday, October 29, 2009 9:10:29 AM

Gentlemen:

I applaud your efforts to help restore rockfish in Puget Sound.

However, one recommended action seems quite ominous to recreational sports salmon fishermen like myself. The establishment of substantial Marine Protection Areas would seem to permanently preclude salmon fishing of any sort also.

I have been fishing Puget Sound for many years. I remember the good rockfish, cod, pollock, and salmon populations years ago. It is quite obvious to me that these populations disappeared when the Indians were allowed to net fish without restriction. Then the coup-de-etat was commercial bottom-fishing and charter operations, that shifted from salmon to rockfish, after the Judge Boldt decision. I would hope that your proposed plan can be fine tuned to prevent the native and commercial fisheries from repeating the mistakes of the past, once the populations increase.

I dont dispute that recreational fishermen have taken their share of rockfish in the past, but 99% of the time they were targeting rockfish/bottomfish. I would challenge the notion that salmon fishing or crabbing has a great impact upon rockfish - that hasnt been my experience.

Proposing MPAs would preclude salmon fishing, crabbing, etc., and specifically impact sports fishermen. I am fine with restrictions on the taking of bottom fish, but please consider limiting the use of MPAs, that will unfairly impact sports fishermen.

Thank you for your time and efforts,

Ralph E. Raymond
9314 Angeline Rd. E.
Bonney Lake, WA 98391
253-468-8722

From: Ben Bear
To: SEPADesk2 (DFW);
Subject: Rockfish Conservation Plan
Date: Thursday, October 29, 2009 9:04:06 AM

217

I am asking you to extend the public comment period on this proposed act from 30 to 90 days. The action proposed is too serious to rush thru without all sides be heard and options being explored.

Sincerely,
Ben Bear

From: Bodsky, Marcel
To: SEPADesk2 (DFW);
Subject: Comment on SEPA No. 09063
Date: Wednesday, October 28, 2009 4:48:49 PM

214

I am a freediver who in the past also speared fish. I have seen 35 years of change in the rockfish population, and the change has been dramatic. I would recommend completely removing rockfish from any allowable fishery for at least 10 years. The most conservative approach proposed in the conservation plan does not seem to me to meet the goals of stabilizing or building up the population, based on my experience.

Marcel Bodsky | **Senior Architect**
Office: 206.883.9300 | Direct: 206.883.9314 | Fax: 206.883.9301
marcel.bodsky@tetratech.com

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From: bobbotnen@yahoo.com
To: SEPADesk2 (DFW);
Subject: Rockfish
Date: Sunday, October 25, 2009 7:01:40 PM

219

I have been bothered by rockfish regs for some time. For starters, it takes 20 years for a rockfish to reach 5 lbs, they grow slow. They need kelp to lay their eggs in. Instead of protecting kelp beds, our wondrous dept of fish and game issue seaweed licenses. Anything for money, right?? The resident asians have harvested any kelp that is not in marine sanctuaries. This is deplorable. Also, we cannot keep yelloweyes, they must be thrown back. Doesn't anybody in the dept actually fish? Yelloweyes are caught in deep water, and their air bladder pokes out of their mouths when brought up, leaving them to flop on top of the water, until they die, or are eaten by seagulls, seals, etc. I also propose somebody change the rules, so that license money gets kept in the dept to spend on fishing issues. Not dumped in the general fund where Christine can spend it. If I sound upset, I am. Thanks for reading, Robert Botnen 2106 75th St E, Tacoma,
98404, 253-537-1918

From: Lee Landrum
To: SEPADesk2 (DFW);
Subject: Comments on rockfish proposal
Date: Tuesday, October 20, 2009 7:45:34 AM

3-270

1. Close the fishery to ALL rockfish retention. Right now, you're allowed to keep 1. I don't think anyone would have a heartache about that.

2. Require fish descenders to release bycatch. There is plenty of available science and research to show that these work. In fact, many fisherman already use these because most of us aren't out there to kill things we don't plan to keep. The simple and effective tools are generally a barbless hook attacked to an 8-16 ounce weight. Inexpensive and more importantly, easy to use. Require anyone fishing in marine areas with the rockfish population problems to carry an approved descending device.

Stating that there needs to be more research done is a cop out. There is no reason why you guys couldn't go out there right now and test a few of them out. They are all inexpensive and you could follow the fish down with a camera or live diver to see how well each type works.

3. Shut the ling cod fishery down. A 6 week season while the males are still on the nests seems bad. Plus, added rockfish bycatch. The season isn't good enough to make it worth it.

4. Close all bottom fishing in water deeper that 60 feet. The only bottomfishing really left open is flounder and greenling. And you should have no problems finding them in 60 feet or less.

5. Concentrate the efforts on pollution and the general health of the Puget Sound. Creating MPA's isn't going to do a thing if they are filled with toxins, waste, oil, etc.

6. Monitor the health and manage accordingly. The goal shouldn't be to keep it closed down indefinitely (like many MPAs do).

7. Hatchery help. Take wild caught rockfish and create a SINGLE generation and release them ALL. Use WILD CAUGHT rockfish to create every subsequent generation of hatchery fish. DO NOT USE HATCHERY bORN FISH TO MAKE SUBSEQUENT GENERATIONS OF HATCHERY FISH.

Thank you

L. Landrum

From: Kelly Smith
To: SEPADesk2 (DFW);
Subject: Rockfish Conservation
Date: Tuesday, October 20, 2009 2:05:54 AM

Let's not study this too long. Act quickly and decisively. Close the fishery now! The closure of Hood Canal has done wonders for the rockfish, particularly the brown rockfish. Numbers in the Eldon area appear to have returned to that of my youth. If fishing were legal, I'm positive that I would catch many quality fish. That closure has only been for a relatively short time. We could use the same rebound in all of Puget Sound.

The closure will be painful, but it is necessary. It is likely that commercial fishing for bottomfish should never be allowed again in Puget Sound.

I love fishing for rockfish and while I'll be sad to take some years off, I know that this is a necessary step.

Another aspect that needs to be reviewed is enforcement. Many fisherman in Hood Canal are poaching rockfish. Sure, they are small ones very close to shore, but you rarely see an enforcement officer. I've seen them only during shrimp and crab season, and then they are concentrating on those species.

Good luck with implementing your plan.

Sincerely

Kelly Smith

From: Mike Sear
To: SEPADesk2 (DFW);
Subject: Rockfish Comments
Date: Monday, October 19, 2009 9:51:32 PM

222

The following comments are submitted for the Rockfish conservation plan.

1. I am a 41 year resident of the State of Washington and recreational Sport fisherman.

2. In my opinion and observations, Rockfish have been targeted and over-fished to the brink of extinction. If protection and strict enforcement are not put in place soon, Rockfish will end up an ESA listed species.

3. I am in support of a total ban on Rockfish retention in all Marine Areas of Washington State.

Respectfully submitted,

Michael F. Sear

216 Marina Lane
Friday Harbor, WA 98250

From: Leonard Dosono
To: SEPADesk2 (DFW);
Subject: Rock Fish
Date: Monday, October 19, 2009 7:00:25 PM

223

What the Rockfish conservation needs is ENFORCEMENT with stiff penalties!! I have seen ALOT of snagging this year on King and other salmon on the Duwamish River and absolutley no enforcement.

I have called many times and no response except once.Believe me these same guys are catching these Rockfish and getting away with it.

I fish therefore I'm BROKE!!!
Leonard

From: DennyTaylor@comcast.net
To: SEPADesk2 (DFW);
Subject: Puget Sound Rock fish
Date: Monday, October 19, 2009 4:54:55 PM

To save the rock fish, in Southern Puget Sound, From a Line from Alki point, to the Port orchard Ferry landing, close the waters South to all sport , commercial, and Net fishing for a minimum of 4 years. Totally. That includes spear fishing.

I have been a Sport Fisherman since I stared at the age of 4 years old. I am still a avid Sport fisherman at the age of 68 years old last Saturday. I fish both Lakes and rivers, , and Salt Water in the Straits Of Juan Defuca, Hood Canal, and off shore up to 30 miles. I have my own boats. One for lakes, and one for Salt Water.

The management of the fisheries here in Washington have been for Special commercial and tribal interests for years leaving out the sport fisherman many, many times. Habitat has a impact, I agree. But when I fish the East Side of Hoods Canal rivers and streams, and find no fish at all, it is because of the nets. not only tribal nets. Some years back there was net fishery for the dog fish. But the nets took everything. Cod, Ling-cod, sea bass, perch, you name it. then they blame habitat loss after the bottom dragers went through and destroyed kelp and ell grass. The Straits, I have watched and filmed the by catch from commercial netters, the kelp beds destroyed by commercial netters. and nothing is ever done to prevent it. It is a disgrace.

The only way to effectively save the rock fish is transplant some to South Sound, and do not let any one catch them till they have laid their eggs a few times. and reproduced.

It is called common sense. Same with Sea Run Cut throat. I use to fly fish for them off Anderson Island, Raft Island, Fox Island, and Further South. I would maybe take a couple home and release the rest. before catch and release was even popular. Always caught them. Not now, Or at Hood's Canal. Even though they are off limits to fish for, it

doesn't mater, there isn't any. At least when I dive these areas I don't see them i still see one once in awhile North of Hoods Port when I dive at Lillywop, but it is seldom.

This would be a old fisherman's advice. You should get some of us together who have fished for 60 plus years and see what we think. We would problay give you a earful.

From: Craig Andersen
To: SEPADesk2 (DFW);
Subject: Rock fish conservation
Date: Monday, October 19, 2009 3:23:23 PM

The agency's recommendations concerning these vulnerable fish populations. As I am sure the Department is well aware, sea bass and other rock fish grow very slowly and take quite a while to age to sexual maturity. Strict restrictions on the harvest of these fish is necessary to preserve the species.
Craig S. Andersen
Attorney at Law

From: Jim Ives
To: SEPADesk2 (DFW);
Subject: Rockfish
Date: Monday, October 19, 2009 3:14:40 PM

226

My recommendation is to close the season entirely for many, many years until the stocks can recover. I recall these species requiring many years to mature to reproductive age. I believe the limit currently is one rockfish, which is not even enough for a meal anyway. Consideration must be given on how to minimize incidental catches when fishing for other fish species, as when these are brought up from the depths their chance of survival is negligible. Consideration should also be made to create reserves where these species are abundant and protected so that incidental catches do not occur.

Jim Ives

METZLER
700 Fifth Avenue, 61st Floor
Seattle, WA 98104
206-224-3905
206-224-3935 fax
www.metzlerna.com

From: hwbranch@aol.com
To: SEPADesk2 (DFW);
Subject: comments conservation plan for rockfish
Date: Friday, November 20, 2009 2:45:53 PM

227

Comments Regarding Draft Conservation Plan for Rockfish:

I believe this is a comprehensive, thorough piece of work.

If I were to offer a suggestion it would be that we run every thought ecosystem-wide and strive for ecologically based management. How do physical, chemical and biological parameters interrelate? How, for example, do changes in physical structure through dredging or armoring alter dissolved oxygen and primary production?

The key to rockfish recovery is going to be marine reserves. This is the only way to establish and guarantee the genetic integrity of some species. Areas adjoining reserves will eventually become productive, sustainable fisheries. We should think in terms of the division of space.

The questions surrounding reserves, enhancements and other ecological tools are very complicated. We don't want lingcod preying on endangered salmon or other unintended impacts. There are folks at WDFW who would be adept at making these kinds of judgements. We need to get moving before any more of them retire.

Harry Branch
239 Cushing St NW
Olympia WA 98502
(360) 943-8508

From: budsox33
To: SEPADesk2 (DFW);
Subject: Rock Fish Recovery Plan
Date: Thursday, November 19, 2009 11:05:43 AM

228

Dear Greg,

Based on the late submittal of this plan, perhaps it could be best served if tabled until next year when it can be adequately discussed.

Bud Stocking
2426 55th St SW
Everett, Wa. 98203

From: Curt
To: SEPADesk2 (DFW);
cc: seablues@msn.com;
Subject: Puget Sound Rockfish Conservation Plan DEIS
Date: Saturday, November 21, 2009 10:15:11 PM

229

To: WSDFW

Re: Puget Sound Rockfish Conservation Plan DEIS

Dear Sir or Madam:

This letter is written in support of the Rockfish Conservation Plan. We fully support the listing of appropriate rockfish species under the ESA. We fully support providing maximum conservation efforts in the rebuilding of rockfish populations. We support the concept of marine reserves in efforts to accomplish the restoration of rockfish in Puget Sound.

Thank you for your efforts on this.

Sincerely,

Curt A. Puddicombe
Coalition to Protect Puget Sound Habitat
Gig Harbor

From: Anthony Pennington
To: SEPADesk2 (DFW);
Subject: Rockfish Conservation Plan
Date: Friday, November 20, 2009 7:29:09 PM

230

Dear WDFW,

I am thrilled to hear that you are developing a plan to restore the Rockfish populations. This email is to voice my support for any measures taken to protect Puget Sound Rockfish. I assure you that when you implement your plan you will have many volunteers from the Puget sound scuba diving community begging to help. News of the Rockfish Conservation Plan is filtering through many scuba diving networks and the support seems very strong.

Thank you,
Anthony Pennington
8609 68th Street NW
Gig Harbor, WA 98335

231

From: Henry Valz
To: SEPADesk2 (DFW);
Subject: Rockfish DEIS comment
Date: Sunday, November 15, 2009 2:36:08 PM
Attachments: Rockfish DEIS Comment - Henry Valz.doc

Hello,

Attached is my comments for the Rockfish DEIS.

Thanks,
Henry Valz

"You can't direct the wind, but you can adjust your sails." ~Unknown

Written Comment for Draft EIS for Puget Sound Rockfish
J. Henry Valz

I, like most others, also support an extension of the comment period for the DEIS for Puget Sound Rockfish.

In general, I support the plan set forth by the DEIS, however, I feel that some of the scientific information is presented in a confusing or ambiguous manner, as well as some aspects of rockfish biology and conservation are missing.

In Section 2.7.7 the size of the diet of seals and sea lions in Puget Sound is presented. Included in this is an estimation of what percent of the diet of seals rockfish are estimated to be in the San Juan Islands. With this number, several people have then estimated the consumption of rockfish by seals in Puget Sound to be a very large number, in excess of 100,000 pounds. However, this is not correct, as the San Juan Islands are ideal locations for rockfish to be captured by seals, and it does not represent any other area of Puget Sound accurately. Because of this, the amount of rockfish eaten by seals is being over-estimated often by 10 to 100 fold.

Additionally, while rockfish take by seals may be high in some areas of Puget Sound, the areas (south Puget Sound) and species of greatest concern (quillback, canary, and yelloweye) not going to be as affected by seals as the Lance and Jefferies studies implies for the rockfish around the San Juan Islands.

I believe this information needs to contain notes to clarify the information, so as not to make seals appear a greater threat than they actually are.

While the effects of age truncation are mentioned in the DEIS, the presence of age truncation, as seen be decreasing sizes of rockfish for the last 30+ years is not mentioned in the DEIS. I feel that this should be included, as several studies in Puget Sound have shown large declines in fish size, which will affect rockfish recovery.

One aspect that I also feel needs to be included in the analysis of the health of Puget Sound rockfish is the limited ability of rockfish larvae from north Puget Sound, the Georgia Strait, and the Strait of Juan de Fuca to enter south Puget Sound. This not only presents a problem for species that are in limited numbers already in the southern areas, but also presents a problem trying to get rarer species like canary and yelloweye to re-colonize the areas they once incorporated.

Because of this potential for problems, I believe that the alternative for "Monitoring, Evaluation and Adaptive Management" portion for the south Puget Sound stocks should be moved from "Conservative" to "Most Conservative. I believe that the same is true for research of south Puget Sound rockfish species.

I support the choice of the "Most Conservative" alternative for "Outreach and Education", however, I am concerned that this alternative will not be implemented to an adequate

level given limited available funds and employees at WDFW. I believe that WDFW should consider a partnership with a group such as the Wild Fish Conservancy or People for Puget Sound to emphasize the education and outreach that can occur.

The use of Marine Protected Areas is mentioned in the "Ecosystem" and "Monitoring, Evaluation and Adaptive Management" portions of the DEIS. I support fully the creation of Marine Protected Areas throughout Puget Sound. Edmonds Underwater Park at Brackett's Landing, Octopus Hole, and Sund Rock have shown us that given enough time, MPAs can not only be valuable fisheries management tools, but also provide valuable income for local areas around the MPAs. While the amount of MPAs that should be included will be debated, current research shows that it should not be less than 20% of the available habitat, plus large buffer areas around the protected habitat.

I also support the creation of Rockfish Recovery Areas to cover the entirety of the rocky areas of south Puget Sound. This will allow for increased management of fisheries in areas where historical and current rockfish bycatch has likely led to a large portion of the rockfish decline. Included in the management of RRAs should be increased hook size and altered shape to prevent rockfish catches. Also, depth restrictions should be in place when fisheries are open. In areas of low-quality substrate, rockfish tend to go deeper in the winter and spring. This is also during the periods of the blackmouth and lingcod fisheries. If depth restrictions are in place, this can reduce the rockfish bycatch, to near zero, if done correctly. Bottom jigging should be illegal in all RRAs, except for during lingcod season.

Finally, I want to thank the employees of WDFW who put this plan together. They have worked very hard on this plan, and I feel that with minor revisions it could be an excellent first step in the recovery of rockfish.

If you need to contact me, feel free to do so at henryvalz@yahoo.com or at 360-791-0147.

232

From: Justin H. Valz
To: SEPADesk2 (DFW);
Subject: Ms Kirk Environmental Sciences Classes" comments on Rockfish DEIS
Date: Monday, November 16, 2009 8:42:27 AM
Attachments: Mr Kirk"s Environmental Science Rockfish DEIS Comment.doc

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Hello,

Attached are the comments and alternatives supported by Ms Kirk's Environmental Science class from Olympia High School.

Thanks,
Henry Valz

Rockfish DEIS Comment
Ms. Kirk's Environmental Science Classes
Olympia High School

Analysis of class survey:

Fisheries Management:

- 5 supported the most conservative alternative
- 10 supported the conservative alternative
- 2 supported the status quo
- 0 supported the least conservative alternative

Comments*:
"One fish a day will not reduce numbers."
"Don't prevent fisherman from hunting altogether."
"Make it only seasonal fishing."
"Reduce bycatch."
"MPAs can be removed when rockfish come back."
"Change the fishing season."

Artificial Habitat:

- 2 supported the most conservative alternative
- 13 supported the conservative alternative
- 3 supported the status quo
- 0 supported the least conservative alternative

Comments*:
"Don't sink boats to add habitat"

Hatchery Production:

- 5 supported the most conservative alternative
- 9 supported the conservative alternative
- 0 supported the status quo
- 1 supported the least conservative alternative

Comments*:
"Small hatcheries will be sufficient."
"Breed only key species."
"We are concerned about overpopulation."
"There is a higher chance of survival in hatcheries."
"Hatcheries don't help much."

Ecosystem/Food Web:

- 1 supported the most conservative alternative
- 9 supported the conservative alternative
- 6 supported the status quo

- 0 supported the least conservative alternative

Comments*:
"Reducing predators is important."
"Allow some more fishing on predators."
"Too much take of predators can throw things out of balance."
"Don't mess with the ecosystem."
"Don't create a new problem."

Outreach and Education:

- 4 supported the most conservative alternative
- 6 supported the conservative alternative
- 5 supported the status quo
- 1 supported the least conservative alternative

Comments*:
"Teach people rather than using a brochure."
"Make information reach out to more people."
"Teach and create more jobs."

*Comments from students have been abridged and/or summarized.

From: Freemans
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan
Date: Saturday, November 14, 2009 1:23:39 PM

I am writing in opposition to the Puget sound Rock Fish Conservation Plan as drafted. Rather than closing the designated area as proposed, it might be more advantageous to the population of fish, to the recreational public and to local economies to maintain the seasons under present guidelines, but drastically reduce the harvest limits, and require selective fishing rules, including requirement of barbless hooks.

233

Don Freeman
5116 Arlington Ct SE
Olympia, WA 98501

From: LewisBoyd@aol.com
To: SEPADesk2 (DFW);
Subject: Rock fish plan
Date: Friday, November 13, 2009 9:55:54 AM

234

I'm against targeting recreational fishermen with MPA's until all aspects of the problem has been looked at and corrected. Some of the other aspects would be the total waste of the resource caused by by-catch of commercials, the unmanaged growth of sea lions and seals and their impact on the resource, and the solution that has began by taken the ghost nets out that kill day after day and reclaim the habitat these nets have destroyed.
You haven't supplied the science that sport fishermen have caused this problem so it is impractical to start with a user group with the least probable impact. MPA's should be used as the last resort.

Thank you,

Lewis Boyd
1127 Hoyt Ave.
Everett, WA 98201

From:	Tom Burlingame
To:	SEPADesk2 (DFW);
Subject:	Rockfish conservation plan
Date:	Friday, November 13, 2009 9:44:17 AM

235

Thank you for the opportunity to comment on the Puget Sound Rockfish Conservation Plan.

My name is Tom Burlingame and I am the owner / operator of Excel Fishing Charters operating both from the Ports of Everett and Neah Bay.

I have read the WDFW report "The Biology and Assessment of Rockfishes in Puget Sound" and attended the meeting on the matter at the Mill Creek office.

I believe your proposed plan has some good ideas and also some misguided ones. For instance, the continued study of Rockfish and their habitats or preferred habitats is a good idea. Removing derelict fishing gear is a no-brainer. Understanding the impacts of predators, such as marine mammals, is great. Also, building more artificial reefs and implementing a hatchery program may be helpful, although more research is needed. I do however, strongly disagree with creating marine reserves. Doing this would have negative results in several ways. One, is it would decrease funding by removing from the water the people who have and will pay for the research necessary for rebuilding Rockfish populations. It would be better to just close all recreational Rockfish fishing in Puget Sound and use any by catch information you can gather as part of your needed ongoing research. You also need to educate the fishing public on the effects of barotrauma on Rockfish and that the popular "catch and release thing" is not OK or acceptable for Rockfish. The by catch of Rockfish when fishing for Salmon, especially with downriggers, is a very small component of the total impact on Rockfish. I have fished for Salmon for over 25 years in Puget Sound, both on my own private boat and on charter boats that I have captained or crewed on. In over hundreds or more likely thousands of trips, I can recall only catching 3 Rockfish while fishing with downriggers.

The department has made many positive steps in reducing the impact on Rockfish in the past (i.e. commercial closures and reduction of sport limits). Now, let's take the next steps by removing derelict fishing nets, more research on Rockfish and what may help them, educating the public, and closing the recreational harvest of Rockfish in Puget Sound, NOT CLOSING OTHER RECREATIONAL SALMON FISHING OPPORTUNITIES BY CREATING

NO FISHING RESERVES THAT WOULD HARM OR ELIMINATE A VIABLE AND VALUABLE
SALMON FISHERY!

Thank you again for the opportunity to comment. I would appreciate receiving any updates on the Puget Sound Rockfish Plan.

Thomas Burlingame
Excel Fishing Charters
14928 180th Ave SE
Monroe, WA 98272
tom@excelfishingcharters.com
425-232-5453

From: Kevin.Lanier@faa.gov
To: SEPADesk2 (DFW);
Subject: Rock fish recovery plan
Date: Friday, November 13, 2009 7:39:38 AM

236

I feel that there should **NO retention** of rockfish in Puget Sound areas 8-1 and higher for a period of 5 yrs.
Lingcod fishing should be restricted to depths in excess of 120ft. To protect spawners UFN
I also feel like the limit for Rock Fish including sea bass should be reduced to 5 fish total per day
in all other marine areas

Kevin Lanier
626 Glen St #201
Edmonds Wa 98020

237

From: Howard Kauffman
To: SEPADesk2 (DFW);
Subject: rock fish closures
Date: Thursday, November 12, 2009 9:08:54 PM

I am an avid fisherman and scuba diver. I have lived in the Puget sound area for 48 years. I have seen how the overfishing of commercial and tribal fisherman has destroyed the Puget sound. In the 80s, the draggers were let in and the bottom fish never recovered. As soon as you close ALL inshore waters to COMMERCIAL and TRIBAL NETS, you will NEVER achieve your goal. The Gouyduck harvesters destroy habitat daily. I see all this action as a diver! When are you people going to get a conscience and stop the problem. When you close an area to sportsmen, who fish with a hook and line. You turn around and open it to nets????? Our sportsmen money supplies jobs and put money into the economy. Where does the commercial and tribal money go. Oh yea(politicians pockets) Why doesn't the USA look at Canada's resources. They have no nets and they let people sink ships for reefs. The US people go to Canada to fish and dive because there is fish there and the sportsman's money fuels the economy. Thanks for your time, Howard Kauffman

From: Bob Wilkie
To: SEPADesk2 (DFW);
Subject: Rockfish
Date: Thursday, November 12, 2009 7:15:23 PM

Hello, I am a long time resident of Washington state, and I am a scuba diver, sport fisherman, and a lover of the outdoors. I hear you are considering a plan to better manage our rockfish populations. I want to weigh in that I am more than willing to give up my ability to harvest these fish until we know more about their habits and can ensure their long term survival. I would like to see them thriving, not just surviving. It seems a shame to me to make dinner (a single dinner) from a fish that may have taken 20-30 years just to get that size. They are much more value to me to witness them gliding along a rockpile, one of the most beautiful fish that swims.
Thanks for your work on this important issue,
Bob Wilkie

From: gcrods@wavecable.com
To: SEPADesk2 (DFW);
Subject: It doesn"t matter.....
Date: Thursday, November 12, 2009 6:29:33 PM

239

It does not matter one bit what anybody says about the proposals. The Dept. has their mind made up and already know what's going to happen. This so called comment period is just a legality that the dept. has to do.
I've been fishing here (commercial & sport) for over 40 years and have been a charter boat captain for over 30 years. I was involved with the negotiation process for the charter/sport fishermen during the late 70's and 80's and I finally quit banging my head against the wall and said "OUCH, this hurts" and quit trying to play politics in a one sided game.
This state cannot do a damn thing about the tribal share of everything but the dept. sure can restrict the non-tribal share. The dept. doesn't want the non-tribal fishermen to catch "their" (the dept's) fish because the dept. needs to justify their jobs.
We keep getting charged more and more every year and we get less and less every year.
The dept. has continued to lie to the people of the state because someone in the dept. must think that every sportsman in this state is totally stupid and will just go along and believe everything the dept. says.....and they are pretty much right as to think that.
The PERFECT EXAMPLE:
In the first week of March this year, Michelle Evans, a puppet mouthpiece for someone in the dept. said that the halibut season for areas 5 & 6 would be shortened by a few weeks due to us catching way over our quota from the previous year.
SAY WHAT? First, there is NO quota for areas 5 & 6.....it is a "set date" from one date to another and it didn't matter

how many halibut were caught. Areas 5 & 6 are not areas 3 & 4 where there are many fish checkers measuring every fish that hits the dock.
Second, how the hell does the dept know how many fish were caught in areas 5 & 6 when this was stated the first week of March when the catch record cards are not due till after the 30th of APRIL.?????
I also read the Point No Point Treaty Counsel's guidelines for the tribal fishery. Their season started the 21st of March with NO LIMIT for the first 3 days, then it was a 500lb limit per boat per day till the 23rd of April when the non-tribal fishing started. But they could still keep on fishing till the end of the year for subsistance, selling halibut under the table to whomever would buy it from them. Does the tribes have a quota? If they do I sure the hell couldn't find out what it was.
And so goes the rest of the bullshit the dept. throws at the people of Wa. State.
I also figure that this email will make it to the round file before anybody on the commission gets to read this and will not ever get a response from them or especially Phil Anderson.
It is things like this that turns law abiding people into pirates and poachers I have been told many a time by others. There are so many rules and regs that nobody can understand them by trying to read the booklet, which is getting to the size of the encyclopiedia, the Clallam County District Court Judge cannot even read it. The dept. has a serious problem but will continue it's mismanagement. Hopefully, every person in the state will not buy a license one year and watch the state go into a tailspin from a few million dollar shortfall.
The dept. thinks all is hunky-dory just so long as they continue to use their "buzz" word : opportunity.....we have our fishing opportunity even though it gets less and less

every year.

Gary Gorss
422 Marsden Rd.
Port Angeles, Wa. 98362
360-452-8155

240

From: John Hartigan
To: SEPADesk2 (DFW);
Subject: New Rockfish Regs.
Date: Thursday, November 12, 2009 4:40:48 PM

After reading the proposed regulations, it occured to me to ask why go so far from the get go? I think a wise step would be to go to the no rockfish retention and then measure its success before putting into effect more regulations. Also, the 120 foot rule will effectively eliminate ling cod fishing in the sound. we only get 45 days as it is. How can this rule be enforced say in the San Juans where one second you are fishing in 100 feet of water and the next second you are in 200 feet of water? Thank you for your consideration.

John Hartigan
253-370-2266
2323 N. 31st St #200
Tacoma, Wa 98403

From: Joseph K. Gaydos
To: SEPADesk2 (DFW);
Subject: Comment on SEPA No. 09063
Date: Thursday, November 12, 2009 10:21:04 AM
Attachments: WDFW Draft rockfish EIS - SeaDoc comments Nov 09.pdf

241

Dear Ms. Eturaspe:
Thank you for the opportunity to review the Department of Fish and Wildlife's DRAFT Environmental Impact Statement (DEIS) for the Puget Sound Rockfish Conservation Plan. Please find attached comments from the SeaDoc Society (PDF format). Let me know if you have trouble opening the document or require more information.
Sincerely,
JOE GAYDOS

Joseph K. Gaydos, VMD, PhD
Wildlife Veterinarian and Chief Scientist
The SeaDoc Society
UC Davis Wildlife Health Center - Orcas Island Office
942 Deer Harbor Road
Eastsound, WA 98245
360.376.3910 - phone
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November 12, 2009

Teresa A. Eturaspe, SEPA/NEPA Coordinator
Washington Department of Fish and Wildlife
600 Capital Way North
Olympia, WA 98501-1091

Dear Ms. Eturaspe:

Thank you for the opportunity to review the Department of Fish and Wildlife's DRAFT Environmental Impact Statement (DEIS) for the Puget Sound Rockfish Conservation Plan. It is obvious that a lot of time and energy has been put into this DEIS.

Over the last decade, the SeaDoc Society has funded and conducted nearly $700,000 in scientific research on the status, biology and recovery of rockfish in the inland waters of Washington and British Columbia. These projects include:

- Using Multibeam Bathymetry to Characterize Rockfish Habitat in San Juan County, Washington Marine Reserves, USA
- Larval Rockfish Dispersal Trajectories in the Georgia Basin/Puget Sound Region of Washington State
- Tracking Species of Concern in the Puget Sound Georgia Basin
- The Use of Genetic Tagging to Assess Inshore Rockfish Populations Within a Marine Conservation Area in the Strait of Georgia
- Genetic Identification of Progeny of MPA-Resident Copper Rockfish (*S. caurinus*) - Self-Recruitment or Emigration
- Using Volunteers to Monitor Fish and Invertebrate Populations
- Estimating Importance of Rockfish, Lingcod and Other Bottomfish in the Diet of Harbor Seals in the San Juan Islands
- Data Input Requirements for the Designation of Rockfish Conservation Areas in Howe Sound: Improving Tools for Decision-Making to Enable Rockfish Recovery Strategies in British Columbia
- Evaluating the Efficacy of San Juan County's Voluntary Bottomfish Recovery Zones
- What is Natural in the Puget Sound Ecosystem? Establishing Baseline Conditions and Identifying Ecological Indicators

As noted in the DEIS document, rockfish stocks in Washington's inland marine waters have been greatly depleted and are in urgent need of restoration. Recovery will help restore the Puget Sound

THE SEADOC SOCIETY

Wildlife Health Center
UC Davis School of Veterinary Medicine

The SeaDoc Society
942 Deer Harbor Road, Eastsound, WA 98245
Phone: (360) 376-3910 Fax: (360) 376-3909
http://www.seadocsociety.org

marine ecosystem, provide viewing opportunities by non-consumptive users like SCUBA divers, and rebuild sustainable fishing opportunities. Our comments on the DEIS are divided into two areas,(1) comments related to the Range of Actions proposed for each of the eight policy categories and (2) comments related to improving the DEIS as written.

Comments related to the Range of Actions proposed for the Policy Categories:

1. **Natural production:** While Alternative 1is the ideal alternative, the high diversity of rockfish species found in Puget Sound combined with the patchy distribution and rarity of some species makes this an untenable option. We strongly support your preferred option of Alternative 2, to manage rockfish placing a high priority on the protection of key rockfish species and stocks assuming those are the key species listed in Table 1 on page 58.
2. **Habitat:** We strongly support your preferred option of Alternative 1 to protect and restore all marine habitat types for all rockfish species, and not limiting efforts to key rockfish species.
3. **Fishery Management:** Overharvest has been a critical factor in depleting most rockfish species. Also, rockfish bycatch is an issue for the harvest of many species, including salmon, halibut and lingcod. Furthermore, rockfish usually cannot be released unharmed when accidentally caught. Therefore we strongly endorse your preferred option of Alternative 1 to manage all fisheries in Puget Sound to ensure the health and productivity of all rockfish populations.
4. **Ecosystem:** Although you correctly state that our understanding of the food web and other ecosystem functions of rockfish are largely unquantified, this does not justify selecting no action as the preferred option for the Ecosystem Category. It is well understood that large numbers of species prey upon rockfish while others are prey for rockfish. Understanding the food web and accounting for ecosystem connectivity are critical ecological principles for designing healthy ecosystems (Gaydos et al. 2008). For too long we failed to account for these when setting harvest restrictions or working to recover species in decline. Taking no action on this because of limited information is unacceptable. We should at least consider Alternative 2 that strives to protect the existing functions of key rockfish and conduct opportunistic activities to restore the functions of key rockfish in the complex ecosystem. Lack of understanding is no longer an excuse to not attempt to manage complex ecosystem-level functions as they relate to species recovery.
5. **Monitoring, Evaluation and Adaptive Management:** We strongly encourage you to consider an intermediate option between Alternative 1, which would monitor all rockfish populations and Alternative 2, which would monitor key rockfish populations, once again assuming those are the key species listed in Table 1 on page 58. While scientifically rigorous monitoring of species that occur at low density, at significant depths and with patchy distribution is not financially tenable, the use of the already established citizen-science REEF environmental education foundation monitoring of rockfish currently conducted by volunteer SCUBA divers could help improve on the limitations of only monitoring key rockfish populations. Data collected by trained volunteer SCUBA divers (at no cost or liability to WDFW) should at a

minimum be reviewed annually by WDFW biologists to help monitor species that are not monitored in a fishery-independent manner by the state.

6. **Research:** Because Alternative 1 would foster the development of sustainable fishing opportunities more than any of the other alternatives, we strongly encourage you to consider changing your preferred option from Alternative 2 to Alternative 1. Science is our best foundation for making informed decisions both on the recovery and the sustainable harvest of species. Had we invested more money in science earlier we might not have let our rockfish populations become this depleted. Investing money in science has much more merit than the proposed investment in enhancement (see Enhancement below).
7. **Outreach and Education:** We strongly support your selection of Alternative 1 to conduct a comprehensive outreach and education program to inform Washington citizens of the value of rockfish populations in Puget Sound. Science and education are key building blocks for recovering and managing species as well as for designing healthy ecosystems (Gaydos et al., 2008).
8. **Enhancement (Artificial Reef and Hatchery Production):** We are strongly opposed to your preferred option of Alternative 2 to develop plans to utilize hatchery production to assist in recovery and to enhance habitat for key species through the use of artificial habitat. There are no data presented that support the need for hatchery production or the use of artificial reefs for rockfish recovery. It is our understanding that although depleted, existing rockfish populations are not functionally incapable of reproducing (as Northern abalone likely are), nor that hatchery production of rockfish has proven to be a wise use of funds. Historically, the use of hatcheries as in the case of salmon has been a crutch upon which we have precariously balanced as a panacea that permitted us to continue the damaging actions that got us into fisheries declines in the first place. Furthermore, there are no data that show that habitat availability is cause for rockfish declines or a limiting factor for rockfish recovery. It is a well accepted ecosystem principle to respect ecosystem integrity (Gaydos et al., 2008). Keeping all the parts of an ecosystem and not adding new ones does not include the addition of man-made structures to create artificial reefs. It is interesting that even in the least conservative option, Alternative 4, artificial reef habitat and hatchery production are still called for. What happened to no action and why are these two expensive, yet ecologically ungrounded tools being considered for all alternatives?

Additional comments related to improving the DEIS:

1. On page 15, Table 4: All killer whale ecotypes, including the Southern Resident population are listed as State Endangered (SE). The possible interaction with rockfish is not listed for numerous species. Species should be removed if they do not have a possible interaction with rockfish. Alternately, you should list all of the listed species in Washington. Species like the Western grebe that are found in Puget Sound and are listed are not currently in the table.
2. The frequently cited reference Palsson et al., 2009 is not listed in Appendix 3. Literature Cited.
3. The Food Web Dynamics section (pages 34-35) has multiple points that need to be addressed. Specifically, we believe you are referring to the inland waters stock of harbor seals when

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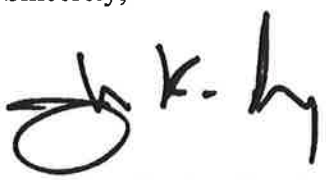
discussing harbor seal growth. Jeffries name is misspelled on the 3rd line. Harbor seals eat primarily small schooling pelagic fish like herring (and salmon when available) and rockfish can comprise a range of 2 to 12% of harbor seal diet in rocky habitat (not in other areas such as in Puget Sound proper). The Lance and Jeffries work cited was a 2 year study (funded by the SeaDoc Society) and WDFW should acknowledge the interannual variation of rockfish in diet. Also, it bears discussion that the rockfish found in harbor seal diets could not be speciated. River otters also have been reported to predate rockfish however there is no mention of this in the section (Jones, C. 2000. Investigations of prey and habitat use by the river otter, *Lutra canadensis*, near San Juan Island, Washington, MS Thesis Western Washington University). Finally, there are actually a multitude of species of marine birds (not several) in decline in Puget Sound.

Thank you again for the opportunity to provide comment. We are excited to see rockfish recovery move forward in the direction that salmon and killer whale recovery have moved and we hope to see similar funding follow this effort to make this recovery a reality. Please do not hesitate to call or email (jkgaydos@ucdavis.edu) with any questions.

Sincerely,



Joseph K. Gaydos, VMD, PhD
Chief Scientist, SeaDoc Society

THE SEADOC SOCIETY
Wildlife Health Center
UC Davis School of Veterinary Medicine

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247

From: Fayette Krause
To: SEPADesk2 (DFW);
Subject: Comments re Draft EIS for Puget Sound Rockfish Conservation Plan (PSRCP) and for the Draft PSRCP itself
Date: Wednesday, November 11, 2009 4:25:22 PM
Attachments: Rockfish Conservation Plan (WDFW).doc

SEPAdesk2 -- Please accept the attached for incorporation into the public comments record for the Draft EIS and the Draft PSRCP noted above.

Thank you for the opportunity to comment on this important matter.

Dr. Fayette F. Krause

November 11, 2009

WDFW SEPA Desk
600 Capitol Way N.
Olympia, WA 98501-1091

Please accept the following comments for the public record re: the Draft EIS for the Puget Sound Rockfish Conservation Plan (PSRCP) and the Draft PSRCP itself.

Comments related to the *DRAFT* EIS for the PSRCP.

In general, the *DRAFT* EIS is a good first effort. It needs clarification in certain areas, and alteration in others. Please consider the following recommendations:

1. It is unclear if a simulated capture from depth and subsequent release of rockfish is comparable to actual, in the field, capture and release. There is no way to accurately assess whether released fish are marginally impaired and thus more susceptible to predators or other, naturally occurring stressors. This caveat should be noted on p. 18 when implying little or no adverse impacts on fish taken from depths up to 33'.

2. It is unclear what management measures are currently being undertaken in the North Sound to justify placing copper rockfish in the "Precautionary Stock Status" category. (p. 26.) This implies that the Department has adopted a policy related to the species that will prevent them from becoming "Vulnerable," as they are in the South Sound. I am not familiar with a policy that protects the large, older females in the North Sound. Moreover, the Department specifically sites a study indicating that even "moderate levels of fishing" can remove older fish. (p. 28) Please clarify what prevents depletion of this critically important portion of the stock under current management prescription.

3. Please clarify why in the Department's table of species bocaccio is listed as "Precautionary" in both North and South Sound when a Federal listing of "Endangered" is proposed for bocaccio stocks in Puget Sound. (p. 26)

4. In Table 8 (p. 27) the Department assesses "Limiting Factors" for rockfish depletion and recovery. Only two are rated "High" -- past (and present?) fisheries and derelict gear. Since these are the primary stressors, it seems logical to concentrate recovery actions on these two factors. The first can be addressed thru creation of Marine Protected Areas (MPA), which the Department itself agrees can positively impact abundance and structure of rockfish stock. (p. 28) Additionally, derelict gear can be addressed in partnership with Federal programs designed to assist with removal. These are both lower cost actions for the state. Note also that the table places "Habitat Disruption" as a ***low*** stressor in Puget Sound – a good reason to avoid costly artificial reef creation. (p. 27)

5. I support Alternative 2 under the "Natural Production" heading. (p. 40) Management for key rockfish species would almost certainly benefit a variety of other rockfish species. Consequently, it would be helpful if the Department would indicate species for which the key species act as surrogates. For instance, does focus on copper and quillback equally benefit brown rockfish? This would strengthen the case for adopting the key species approach.

6. Under "Habitat" please consider Alternative 2. I further request that under this alternative the Department ***delay any construction of artificial reefs*** until, by monitoring, it can determine whether existing high quality habitat is reoccupied by fish. Habitat disruption does not appear to be a pressing limiting factor (see Table 8, p. 27). If this is the case, a more prudent approach would be to wait and see if, with additional regulatory protections, the fish repopulate good, existing habitat. This approach would be less costly and would also be an important test of whether MPA's positively address the stock depletion problem.

7. "Fishery Management" – I fully support Alternative 1, the preferred option. ***The Department, based on its own findings and those in the literature, must adopt a science-based system of Marine Protected Areas.*** (p. 43)

8. "Monitoring, Evaluation, Adaptive Management" – I support Alternative 2. A robust monitoring program must be immediately implemented to determine the success of rockfish protection and restoration actions undertaken by the Department. (p. 47)

9. "Enhancement" – I support Alternative 3 – No Action. If after a reasonable period, perhaps 15 -20 years, monitoring of natural production demonstrates that few positive benefits have accrued to rockfish from the creation of a series of inter-related MPA's and the implementation of increased regulatory protection, then the Department may wish to undertake adaptive management to address continuing deficiencies. This may include creation of artificial reefs, in habitat poor areas such as the South Sound.

Comments related to the *DRAFT* Puget Sound Rockfish Conservation Plan (PSRCP) (Appendix 1)

1. Enhancement: Why is any form of habitat enhancement necessary? There is no mention in the plan or the DEIS of the ***amount or percentage*** of rockfish habitat that has been degraded or destroyed. Without an estimate of the percentage of habitat lost, it is not possible to weigh whether this is a necessary or advisable objective/strategy. (p. 69)

2. Enhancement: Policy Category #1 (Natural Production) and Category #8 (Enhancement) are at least mildly contradictory. Hatchery production is not only costly, it may have negative consequences as noted under action item #2, p. 69. Why would the

Department initiate a new hatchery program when existing programs, most notably salmon, are in such disrepute? The factors enumerated below militate against a hatchery "solution" to the rockfish problem.

a. ***Costly*** – This is an especially ill-advised undertaking in a poor economic climate.

b. ***Long-term*** – A focus on a hatchery approach for the very long-lived yelloweye and canary rockfish locks the Department into a decades long program. Testing a "natural production" model, on the other hand, is relatively inexpensive, initially requiring only the establishment of Marine Protected Areas (MPA) and a rigorous monitoring program. Adaptive management may be required later if monitoring indicates that yelloweye and canary rockfish do not respond well to the model. Using hatcheries as a first order strategy, however, is not only costly, it vitiates an understanding of how depleted stocks respond to full protection in MPA's. Essentially, it precludes an accurate assessment of the effectiveness of protected areas.

c. ***Potentially harmful*** – The introduction of disease vectors or genetically impaired/modified fish into a naturally reproducing population is potentially very risky. Natural production is far preferable.

d. ***Unnecessary*** – The existence of a small but viable reproductive base should ultimately yield recovery at little or no cost, if an adequate system of Marine Protected Areas (no fishing zones) are established. If MPA's are, over time, proven incapable of recovering species, adaptive management can be used to test other alternatives.

3. Habitat Protection and Restoration: While enhancing the effectiveness of the HPA process is laudable, it is currently almost impossible to overcome developmental and "property rights" pressures. If this were an achievable strategy, it would have been previously accomplished. (p. 62.)

4. Habitat Protection and Restoration: What actions will be taken "…to reduce the incidence of new derelict fishing nets"? (Action item #3, p. 62)

5. Monitoring, Evaluation and Adaptive Mgmt: Action item #1 speaks of a "…system of rockfish recovery areas…" while action item #5 acknowledges the need to "develop a network of marine protected areas." Are these the same action or are they different? If they are different, how do they differ? If they are the same, uniform nomenclature should be used throughout the document or a statement inserted that they are used interchangeably. (p. 64; p. 66)

6. Monitoring, Evaluation and Adaptive Mgmt: Under action item #1 the Department expresses the need for a "...network of linked areas of good rockfish habitat where fishing is prohibited or greatly restricted..." The Department is well aware of the critical importance of large, old, breeding females in the recovery of most rockfish species. Taking these large, old fish can have devastating consequences for species recovery. The Department is also aware that, within a recovery area (MPA), it is not possible to have a targeted fishery for unprotected species without putting rockfish at risk. (See #5, p. 59.) Given this, why doesn't the Department simply state that fishing ***will be prohibited*** in a rockfish recovery area or MPA? ***Anything short of this prohibition is largely unenforceable and compromises achieving the goal of rockfish recovery.*** (p. 66)

7. Monitoring, Evaluation and Adaptive Mgmt: The Department is well advised to incorporate all programs and groups listed under action item #3 in forwarding monitoring goals. (p. 66) The assistance of these groups can also be used in the educational process, as mentioned in action items #4, 6, & 7 on p. 68. Further, when MPA's are established, organized angler clubs, non-governmental organizations, and private citizens need to cooperate fully with WDFW enforcement officials to make certain that the closures are honored by all.

8. Outreach and Education: Given declining Department budgets and personnel, how does staff propose to accomplish action items #3, 4, and 6? While the actions stated are commendable, it is difficult to see how they will be accomplished with fewer staff. (p. 68)

9. Natural Production: Under action item #2, what does the Department propose? If the only practical alternative to accomplishing this is to establish MPA's, why not state that?

10. Habitat Protection: The Department is correct in citing water quality as a habitat issue. However, in its efforts to restore vulnerable or depleted stocks, the Department should focus its restoration efforts in existing high quality waters. State government, including the Puget Sound Partnership, is ultimately responsible for improving water quality throughout the Sound. Given the Department's limited ability to improve degraded waters by exercise of its mandate, it needs to concentrate its limited resources in areas where it is most likely to achieve significant, positive responses for rockfish.

11. Fishery Management: This is the arena in which the Department can have its most positive impact for rockfish recovery, and this is where it needs to focus. Staff correctly identifies the current predicament in which three species of rockfish will be Federally listed and other species are either vulnerable or depleted. "These declines have largely been caused by historical fishing practices..." (p. 56). If this is the cause of the problem, this needs to be the focus for the solution.

A common message runs throughout the several Policy Categories delineated in the PSRCP:

a. Action item #1 (p. 61) – "Develop a science-based system of rockfish recovery areas that…is of sufficient size for rockfish movements…"

b. Action item #4 (p. 62) – "Develop a science-based system of rockfish recovery areas…"

c. Action item #1 (p. 63) – "In fisheries where rockfish are captured incidentally…implement regulations to reduce this…by a combination of gear, depth, time, ***and area restrictions***."

d. Action item #2 (p. 65) – "Develop a science-based system of marine protected areas."

e. Action item #1 (p. 66) – "Develop a science-based system of rockfish recovery areas."

f. Action item #3 (p. 67) – "Develop…models to evaluate…rockfish recovery areas as well as the risks involved."

The Department has correctly identified the tool that must be used to address years of inappropriate fisheries. The Department must move forward and establish sufficient Marine Protected Areas (***no*** fishing zones) to accomplish the goal of rockfish recovery. To do less will invite further decline of rockfish species and legal action to reverse this decline.

Thank you for the opportunity to comment on the Draft EIS for the PSRCP and on the Draft PSRCP itself.

Sincerely,

Dr. Fayette F. Krause
2315 Madonna St.
Pt. Townsend, WA 98368

From: Gary Apel
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan
Date: Wednesday, November 11, 2009 5:45:46 AM

243

I strongly support the proposed measures for recovery of rockfish populations, especially the development of a network of Marine Protected Areas. Except for designated fishing piers, all the waters of Pierce, King, Thurston, Mason, and Kitsap Counties shallower than 200 feet should be protected.

Gary Apel

Selah, WA

From: Bykonen, Donald M
To: SEPADesk2 (DFW);
Subject: Rockfish Support the Plan
Date: Tuesday, November 10, 2009 6:53:21 PM

244

WDFW,
Close the Puget Sound to all Rockfish angling. Make Port Angeles the boundary maybe Green Point. Eliminate all Gillnets Bottom draggers and commercial fishing. Increase fines and hire more Wildlife enforcement to watch scuba divers and fishers. The bottom draggers wiped it out years ago now your just starting to do something about it? You should have started in 1980! Our fish would have recovered and we would have had some decent Rockfish populations now if something would have been done years ago.

Don Bykonen

245

From: Leroy Adams
To: SEPADesk2 (DFW);
Subject: rock fish
Date: Tuesday, November 10, 2009 4:37:32 PM

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leave the rock fishing alone.there are more rock fish today then 10 years ago.there coming back .dont fix some thing that isnt broken.

346

From: K Brockway
To: SEPADesk2 (DFW);
Subject: rockfish conservation plan comments
Date: Monday, October 19, 2009 3:10:32 PM

Living on the northern end of Hood Canal I am in favor of conservation but only if this conservation allows sport fishing for some type of bottom fish whether that be rockfish or sole or ling cod. Having the canal closed for these few years to all bottom fish is senseless to me and provides little opportunity for recreation that we moved there to enjoy. There seems to be an over abundance of sole which at least offer some fishing in the area during the summer months now that crab season doesn't open until the end of July.

From: Hank Lounsbery
To: SEPADesk2 (DFW);
Subject: Rockfish recovery plan
Date: Wednesday, December 09, 2009 11:08:18 PM

247

I highly concerned and opposed to the Rockfish Recovery Plan submitted by WDFW. The plan has many significant omissions and lacks good science for proposed actions that would significantly affect recreational/sports fishing for many years.

First, the plan places all of the responsibility on sports fishers, whom have a relatively small impact on rockfish. It seems to assign the greatest responsibility for their decline on this group, but minimizes or omits factors, such as the increase in seal population, pollution, tribal drag nets, and the impact of 'ghost' or lost nets.

Your department takes no credit for previously mismanaging the resource.

The plan fails to give adequate consideration to the improvement of
rockfish habitat by adding over 600 acres through the removal of 'ghost'/lost nets. Further the plan does not adequately consider the increased habitat through the implementation of artificial reefs, as proposed by Mr. Bear Holmes and his associates. These reefs would add nursery areas that would increase the rockfish populations.

The plan fails to adequately consider the predation by seals- the largest impact on rockfish. Nothing is offered to reduce such predation.

The plan would close ~20% of Puget Sound to sports fishing through proposed Marine Protection Areas and a depth limit of 120 feet; basically closing down some of the most productive salmon fishing areas. This plan does not offer appropriate consideration for the economic and iconic value of salmon. The economic effect would be significant. It is completely unfair, capricious and unethical.

The plan doesn't adequately consider the Tribal drag net operations effects on rockfish mortality.

WDFW has the proven ability to reproduce bottom/rockfish at their hatcheries yet this was not given adequate attention in the plan.

With so many shortcomings, I am opposed to the plan as offered. It needs further changes to consider all the factors; after revision it should then be presented to the public for comment, and with a longer comment period.

Sincerely,

Henry K. Lounsbery
Oak Harbor, WA 98277

From: Francis Okano
To: SEPADesk2 (DFW);
Subject: Rockfish Recovery Plan
Date: Wednesday, December 09, 2009 10:02:51 PM

248

Mr. Bear Holmes

After reading your recovery plan, I agree with trying to save all species of fish whether they are rockfish or once plentiful Salmon is a good ideal.

I also believe that stop fishing will only slow down the inevitable. I believe there is a common denominator that is killing our fisheries. Sure we can stop sports fishing, but who will stop the seal lions from gorging salmon at the mouth of the fish ladder, and, ghost nets from continuos killing? We need to address those issues as well as improving fish habitat.

I have only scratch the surface but I hope you will consider the whole picture before implementing your save the rockfish proposal.

Thank you,
Francis Okano

From:	Lee Kriley
To:	SEPADesk2 (DFW);
Subject:	EIS for Rockfish Conservation Plan
Date:	Wednesday, December 09, 2009 8:44:54 PM

249

I am writing to you regarding the Draft Environmental Impact Statement for the Puget Sound Rockfish Conservation Plan as I indicated I would at the Bremerton meeting on this subject. I said at the meeting that I would write to you about the subject but have had difficulty doing this because there were few specific details presented at the meeting or in the Plan which I obtained from your office. This response therefore is based on my experience with Marine Protection Areas(MPAs) and fishing in California and my experience fishing here in Washington

Several friends have told me that then Governor Dan Evans around 30 years ago told the world that there were so many fish in Puget Sound that they could never all be fished out. He clearly was wrong because so many commercial fishermen answered his call that the fishery was so badly depleted that with the other challenges it faces, it still has not recovered. But it does appear to be recovering from that very low point.

Sea Bass were a species in significant decline in Southern California when I was fishing there. Simply they closed down near shore commercial fishing for several years and set up some rearing pens on Catalina Island and in Newport Beach and in just a few years the return of the Sea Bass was a huge success. Given the unbelievable success of purse seiners in significantly depleting a large supply of fish overnight, such a step here in Puget Sound appears to make sense. Of course they would be very tightly regulated thereafter with some approved gear modifications.

MPAs in California have in a vast majority of instances meant NO FISHING. Before such a drastic step is taken, I ask you to give the highly regarded derelict gear removal efforts of the Northwest Straits Commission a chance to show their results. During the Bremerton

meeting a substantial discrepancy in the perceived impacts of derelict gear on rockfish in particular was pointed out. Regardless of the impact, the result of the removal of this derelict gear can have nothing but a material positive impact on the Rockfish populations as well as numerous other species. During the Bremerton meeting, the WDFW Scientist advised us that one species of rockfish has only one truly successful spawning season on average every thirty years. Who knows when the last one occurred or when it will again occur?

The imposition of a NO FISHING MPA or several of them in Puget Sound would have an adverse impact on the socio-economic culture of this region. Many families regard fishing in the Sound as a favorite activity and many children grow up with it as their favorite sport, not to mention appreciating the food for the table. Many manufacturing, wholesaling and retailing businesses as well as numerous ancillary businesses such as fishing guides and charter boats depend on this sport for their livelihood.

When I show my fishing guests from outside Washington our Sport Fishing Rules Pamphlet they are dumbfounded and tell me that they did not realize they had to be a lawyer to fish in Washington. If MPAs are implemented with the allowance of some fishing, the regulations would become significantly more burdensome and difficult to understand because of another layer of regulation.

Instead of another layer of regulation, within the existing saltwater Marine Areas, additional season and/or gear restrictions could be used to address the reduction of rockfish encounters. I believe this would be easier for fishermen to handle and I urge you to consider this step as a first approach if additional regulation is determined to be justified.

The WDFW representative emphasized that the Department does not want to use a sledge hammer if a tack hammer will do the job. I hope that this is true for the entire Commission because frankly, nothing was presented at the meeting or appears to me in the Draft EIS Rockfish

Conservation Plan which demands immediate implementation of MPAs which I view as a pile driver by comparison. I urge you to look at this matter very carefully and to not act with unnecessary haste. Furthermore, I believe that the closure of the Sound to commercial fishing for a few years would give you many of the results you desire if you truly want to put the fish first and achieve recovery of many species, not just rockfish.

Once a specific plan is proposed I urge you to make it available to the public for comment before it is finalized. I believe that would be the fairest approach.

Respectfully,

LeRoy P. Kriley

From: Dave Kuno
To: SEPADesk (DFW);
Subject: Rockfish Recovery Plan Dave Kuno"s comments
Date: Wednesday, December 09, 2009 11:15:14 AM

I am opposed to the Rockfish Recovery Plan submitted by WDFW. The plan has many significant omissions and lacks good science for proposed actions that would significantly affect recreational/sports fishing for many years.

First, the plan places all of the responsibility on sports fishers, whom have a relatively small impact on rockfish. It seems to assign the greatest responsibility for their decline on this group but minimizes or omits factors, such as the increase in seal population, pollution, commercial drag nets, and the impact of 'ghost' or lost nets. The department takes no credit for previously mismanaging the resource.

The plan fails to give adequate consideration to the improvement of rockfish habitat by adding over 600 acres through the removal of 'ghost'/lost nets. Further the plan does not adequately consider the increased habitat through the implementation of artificial reefs, as proposed by Mr. Bear Holmes and his associates. These reefs would add nursery areas that would increase the populations.

The plan fails to adequately consider the predation by seals-the largest impact on rockfish. Nothing is offered to reduce such predation.

The plan would close ~20% of Puget Sound to sports fishing through proposed Marine Protection Areas and a depth limit of 120 feet; basically closing down some of the most productive salmon fishing areas. This does not seem to offer appropriate consideration for the economic and iconic value of salmon. The economic effect would be significant.

The plan doesn't adequately consider the Tribal drag net operations effects on rockfish mortality.

WDFW has the proven ability to reproduce bottom/rockfish at their hatcheries yet this was not given adequate attention in the plan.

With so many shortcomings, I am opposed to the plan as offered. It needs further changes to consider all the factors about (and more)and then it should presented to the public for comment.

Thank you,

Dave Kuno

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From: ole lindbo
To: SEPADesk2 (DFW);
Subject: Rock fish
Date: Tuesday, December 08, 2009 7:56:22 PM

257

To whom this may concern,
I watched bear holms presentation on rockfish issues today. I urge you to conside the 20 fathom rule that is being proposed in the bill.

thank you,
Ole Lindbo

Sent from my Verizon Wireless mobile phone

252

From: jerry@pencilplanet
To: SEPADesk2 (DFW);
Subject: Comment on SEPA No. 09084
Date: Thursday, December 03, 2009 11:26:20 AM

I would like to add my support to this proposal. I worked on the creation of a series of MCA's in Hood Canal and I have seen the positive results of these set asides.

I have been diving Hood Canal for 40 years and the Sund Rock MCA weekly for the last 7 years. I have seen first hand the remarkable improvement in the rock fish populations.

This is a great tool for stock recovery and enhancement and I highly recommend this proposal.

Thank you for your consideration,

Jerry Ehrlich
PO Box 187
Hoodsport, WA 98548

253

From: HENRY ALTENBURG
To: SEPADesk2 (DFW);
Subject: EIS & Puget Sound Rockfish conservation plan
Date: Tuesday, December 01, 2009 12:35:36 PM

Puget Sound Rockfish conservation Plan

After attending the session on Nov. 30th at Bremerton these are a few requests.
I am a Sport Fisherman and I instructed classes for 28 years on Bottom fishing
and Salmon Fishing.

1. The removal of Ghost Nets is a plus for the fish and must continue, but
Laws have to be made to punish those leaving the nets in the waters, to be
removed at Tax Payers Expense.
2. What type of material would be used to construct New Bottom Fish Ground?
Maybe old cars? (Junk)
3. How many areas are we talking about closing and how large?
4. Will a Depth Restriction be put on Sport Fishing for Salmon or will these
areas be closed to All "Fin Fishing"?
5. Will Manchester Pen's be expanded to raise more Bottom Fish and Ling Cod?
They have (2) Extra Large Pens available.

Henry Altenburg

Kitsap Poggie Club Prsident
3870 NE Hyak Way
Bremerton, Wa. 98311
e-mail address: Gramdiok@msn.com

254

From: Fritz Merkel
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan, (PSRCP).
Date: Monday, November 30, 2009 9:25:16 PM

I've been a diver for 15 years, have over 700 logged dives, a previous President of the Marker Buoy Dive Club <http://www.markerbuoydiveclub.org/>, and currently active as a 2nd year volunteer diver for the Seattle Aquarium.

I have dived all over Puget Sound, Hood Canal, much of the San Juans, Neah Bay and up into Canada including the famous northern tip of Vancouver Island called God's Pocket. <http://www.godspocket.com/> In that entire time several things have been very noticeable.

For a state with an incredible amount of shoreline very little of it is actually available to the public. Huge amounts are either inaccessible or private land. Private land is very hard to control as is evident with the oxygen depletions problems cropping up on a routine basis in Hood Canal.
<http://www.kitsapsun.com/news/2009/sep/01/scientists-discuss-ambitious-effort-to-fix-hood/>

There is a noticeable lack of fish life in the entire area I have dived. On my trip up to God's Pocket an entire day is spent getting there. The experience is one of feeling like you are going to a remote spot. The diving is spectacular for _invertebrate life_. The fish life is.....*poor*. It has been fished out, and fished out long ago. One dive boat we chartered spends the off winter months delivering supplies to the remote fish farms up in BC. Way up north in wild BC there is a need for fish farms.

The same lack of fish life was disappointingly evident in the wild open diving off Neah Bay, wonderful invertebrate life - a distinct lack of fish. A diver can spend a lot of time and money attempting to find areas that are pristine and engaging. The more I learn of diving history the more I realize this is a extraordinarily difficult goal and one that a diver has to go to incredible effort to achieve. We SHOULD be about to have that experience in our own back yard. Sadly we cannot. During high rainfall sewer outfalls are overwhelmed and the Sound is not even safe to dive in.

Our club received a historical presentation by Bill High of PSI

(Professional Scuba Inspectors).
<http://www.psicylinders.com/about.htm> He showed archival photographs of early SKIN DIVING contests in Commencement Bay. Using only spear guns and breath hold diving they would collect more and more varied fish from the same areas than I see in an hours of scuba diving that location.

Puget Sound is fished out. The greater Seattle Metro area and ALL surrounding areas are growing at an incredible pace. With that growth comes increasing probability of environmental destruction and associated habitat degradation. At the same time there is pressure for recreational pursuits at all levels associated with Puget Sound.

I firmly believe going forward that we are going to have to treat all of Puget Sound, indeed all our water as a precious resource and all learn to play on, in, and around it with the same kind of environmental consciousness we place on our National Parks. The time to be exploiting this resource is LONG LONG past.

*To this end I strongly favor the [ALTERNATIVE 1 - MOST CONSERVATIVE] proposal put forward. It is high time we actually did some concrete work to protect the resources we have left. *

Fritz Merkel
6242 51st Ave. NE
Seattle, WA 98115-7710
fritz@merkelclan.com
(206) 525-0736

From: Leonard Olson
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish
Date: Saturday, November 28, 2009 9:01:09 PM

255

I had the opportunity to hear David Smith talk about the Puget Sound Rockfish at our NW Adventure Divers club meeting on November 19th. He presented himself in a very professional and friendly manner and is very knowledgeable about the Puget Sound Rockfish. I saw David as someone who has a genuine concern for protecting the habitat in the Puget Sound Region.

I didn't have an appreciation for the Rockfish until I heard David's lecture. I found him to be a wonderful speaker and very enthusiastic about the work he does. He inspired me to want to learn more and be a contributing factor in preserving and protecting the delicate Puget Sound Region. Thank you.

Sincerely,

Leonard Olson

256

From: RRC6633@aol.com
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan
Date: Tuesday, November 24, 2009 5:19:55 PM

Dear WDFW

My name is Richard Colman. I own a home and operate a small RV park located in Sekiu, WA. I have grave concerns about the proposals set forth for the management of rock and bottom fish, particularly as it pertains to area 5.

I have represented the Clallambay, Sekiu Chamber of Commerce at the North of Falcon process for several years. I have been closely involved with at least some fishery management processes.

Understandably, I would like to address the proposals in an order that is of most importance to area 5 and our community.

Proposal 10 A....allowing spearfishing back into area 5.

I would like to first remind the commission of it's past values and policies addressing Fair Chase and Equal Opportunity.

I attended a commission meeting when the use of Robo Duck decoys were addressed. It was decided then by the commission that the Robo Duck decoys exceeded fair chase guidelines as well as giving one user group unfair advantage over another to a wildlife resource. Spearfishing falls well within both categories.

It is undisputed that spearfishing has a very distinct advantage over other sport fishing methods. It has been challenged many times in the past as far as fair chase. To swim up to a fish that is not overly afraid of you and spear it, in my opinion, does not fall into the valued guidelines of fair chase. I strongly believe proposal 10 A has more than a taint of unfair chase and certainly deserves and award for unfair advantage.

From Neah Bay to far east of Sekiu the beaches are lined with heavy growths of kelp and other seaweed. These, shore to the outer line of kelp, are virtually inaccessible to both boat and beach hook and line fishing, but, is also considered home to most all shore dwelling fish at some point and time. These kelp lines create a "natural" safe haven and spawning area for many non migrating rockfish and bottom fish, a "natural sanctuary". If spearfishing is allowed back into area 5 these sanctuaries are gone. Divers access these kelp lines quite easily and over time reek havoc on local fish populations dwelling there.

In the mid 90's we had a spear fishery in area 5. I have had many of those divers stay in my park. I have also witnessed the many ice chests of rock and bottom fish that they have harvested. These fish came from as close as Sekiu Point and all came from outer kelp line to beach . I have personally watched many of them beached at Sekiu Point, more fish than I ever realized lived there. I envied them of course, but at the same time I recognized this harvest rate would be unsustainable for non migrating fish. It also made me realize that some creative management was necessary to prevent over harvest. In those years I did communicate with the WDFW about creating sanctuaries. Possibly there is some record of this?

Spearfishing for the most part is done in a narrow corridor that is from 25 to possibly 300 feet wide along a beach, not unlike a river containing fish that do not migrate. This is very similar to gill netting in a river, but in kelp, the gill nets (spears) move. Over time, they will eventually spear them all from east to west. Most of these fish are there day in and day out over years, their entire lives. They do not try to escape, nor do they have another place to escape to.

Spearfishing is very efficient but is also very lethal, there is no catch and release option. Size limits for spearfishing is not within good logic and it is unreasonable to propose them. I am sure this good reasoning and logic was used to regulate area 4 spearfishing which is without size limits and which has served poorly.

Under this pretence, if this proposal is adopted, I feel there should be at least protected areas, "no kill zones", for spearfishing for some designated distance around all identifiable rocky points and outcroppings in both areas 4 and 5. Let these become the "Divers World Class Observing Sanctuaries of Tomorrow". If this is what the diving community desires, let them create them, but not at a cost to other fisheries.

To even consider the same seasons and limits, especially size limits, is totally unreasonable and without merit. It is complete fantasy to believe that a diver can estimate the length of a Ling Cod within an inch. Then what happens when he or she makes an honest mistake of an inch, how many of those will occur? Many I am sure.

Area 4 has been totally and poorly managed for many years. The limits have been unrealistic for a sustained fishery. If the limits had been set more closely to what area 5 has had over the years, I cannot imagine how many more sea bass there would be there today.

This along with bottom and rock fish being open in between halibut days in area 4 is poorly thought out. Most people plan there halibut trip to fish halibut both days with one day in between closed. With their boats in the water they are not

going to stay at the dock. Most of the entire halibut fleet goes bottom fishing. This is an artificial, high intensity, impact fishery, created by another fisheries regulation. This should be changed no matter the outcome of these proposals. The day in between halibut days should be closed to rock and bottom fishing in area 4.

Having said all of this.....to believe the closing of the western portion of area 4 and areas 6 through 13 to all bottom fishing....forcing all rock and bottom fishing into the eastern portion of area 4 and area 5..... introducing spear fishing into area 5, and then believing you can have a sustainable fishery for rock and bottom fish...with all due respect commissioners...it will not happen. In the long term this proposal is a disaster and strikes at the hearts of all user groups except site seeing divers...bless their hearts.

It appears one user group has in someway attempted to flex it's mussel. It is my hope that the commission will see through this and reject all of the current proposals as they now stand. Demand a real and inclusive rock, bottom fish management program with proposals that addresses and protects primarily resources and then all user groups.

I also believe that if prposal 10 B had been well thought out it would have been presented to the commission before, not after, the June 1st deadline.

I have 6 small grandson's. I deeply feel, from my heart, that if these proposals are accepted, and if real rock and bottom fish management is not addressed soon, they will never have the opportunity to take their sons rock and bottom fishing. What a shame on the WDFW.

I do plan to attend the meeting of Dec 5th. Hopefully I will have the opportunity to elaborate my concerns.

Respectfully,
Richard Colman
360-825-4518

From: D Bowes
To: SEPADesk2 (DFW);
Subject: Comment on SEPA No. 09063
Date: Tuesday, November 03, 2009 10:53:54 AM

237

Regarding the Rockfish Conservation Plan,

In principle I support it. But as written it does appear to be conceived and written in a slapdash manner. I question the intelligence of a program that would further restrict salmon fisheries to save rockfish. In science, a principle known as Occam's Razor is something I recommend WDFW officials and policymakers review.

Thank you,

David C Bowes
WA Licensed Sport Fisherman

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NORTHWEST STRAITS
marine conservation initiative

December 10, 2009

Mr. Phil Anderson, Director
Washington Department of Fish and Wildlife
600 Capital Way N
Olympia, WA 98501

RE: Northwest Straits Commission comments on draft Puget Sound Rockfish Conservation Plan

Dear Phil:

Thank you for the opportunity to provide comments on the draft Puget Sound Rockfish Conservation Plan. The Northwest Straits Commission and seven Marine Resources Committees provide a local approach to marine conservation and restoration in the Northwest Straits region of Puget Sound. We strive to protect and restore the marine waters, habitats, and species of the Northwest Straits region to achieve ecosystem health. Many of our projects have focused specifically on rockfish protection and sharing educational information to the public about their declining status. The Northwest Straits Commission appreciates your careful consideration of our comments and recommendations.

County Marine Resources Committees
Clallam
Island
Jefferson
San Juan
Skagit
Snohomish
Whatcom
In Cooperation with Participating Tribal Co-Managers

Our comments are focused on the Range of Actions proposed for the eight policy categories:

Natural Production – We support aggressive protection of existing rockfish populations and promotion of their natural production and recovery. Protection of natural populations avoids problems inherent in artificial enhancement and is likely to be more cost effective than artificial enhancement. We support Alternative 1 and strongly recommend "improving regulatory enforcement" as an additional means to implement this strategy.

Habitat– We recommend aggressive protection of natural rockfish habitat and support the development of spatially-explicit management strategies that are based on available science. We recognize the importance of protecting nursery areas as well as habitats used by older, reproductively mature females.

The Northwest Straits Marine Conservation Initiative is currently working to remove 90% of the derelict fishing nets in Puget Sound. We expect that this project will restore over 600 acres of natural marine habitat. This action will have a direct benefit to rockfish species that does not appear to be

Northwest Straits Commission
10441 Bayview-Edison Road
Mount Vernon, WA 98273

phone: 360.428.1064
web: www.nwstraits.org

included in the current SEPA analysis. We believe that derelict fishing nets in water deeper than we currently work (below 100 ft) may be causing significant damage to several rockfish populations of concern, and we will soon begin seeking funds to operate in these increased depths. We would like to work with WDFW to factor in the benefits of the derelict gear removal project and minimize the impact of derelict fishing gear to marine species and habitats in the future.

Fishery Management – We support Alternative 1 and recommend that it be revised to include specific implementation strategies.

Ecosystem – We support the restoration of all rockfish species to fulfill their natural role in the ecosystem. Although it is likely that activities aimed at restoring the function of some rockfish species will benefit additional species, Alternative 3 is a weak policy choice. The NWSC recommends a more pro-active policy such as Alternative 2.

Monitoring, Evaluation, and Adaptive Management – We support Alternative 2 and encourage the Department to focus monitoring on the species of highest concern in order to obtain reliable data that can inform management.

Research – We support Alternative 2 and encourage the Department to focus on key species. We would like to partner with the Department to determine the benefit our derelict fishing net removal project has on rockfish species. Our current analytical capacity is limited, but we expect that the removal of 3000 derelict nets by the end of 2010 will have significant positive effects.

Outreach and education – We support Alternative 1 and we offer to partner with the Department to expand educational efforts to diverse groups of people about rockfish. The Northwest Straits Commission provides funding and coordination to the seven Marine Resources Committees (MRCs) in northern Puget Sound and can serve as a point of contact for these MRCs to disseminate rockfish conservation information to the public.

Enhancement - We are concerned that the use of artificial reefs will not achieve recovery objectives. There are no data suggesting that rockfish species in Puget Sound are habitat limited. Overfishing, not habitat loss, is the primary cause of the observed declines in rockfish abundance (WDFW SEPA analysis report pg. 27). Consequently, we consider it unlikely that recovery from overfishing can be accomplished by the addition of artificial habitat. Furthermore, there is little scientific evidence that construction of artificial reefs will increase rockfish abundance, although apparent increases could be observed due to redistribution of fish from natural to artificial reefs. We recommend that financial resources be directed towards protection of existing populations and habitats.

We recommend hatcheries be used only for populations that cannot otherwise be naturally restored. Hatcheries are expensive. They can cause the loss of genetic diversity and evolutionary potential and increase the propensity for disease introduction and transmission. Hatchery fish can also alter food-web and other ecosystem processes. Consequently, we question whether the use of hatcheries as a "feel-good" strategy provides any real benefit to wild populations. We believe that at this time, the status of rockfish populations does not merit hatchery production, and we recommend that WDFW allocate its limited resources to better protection of existing populations.

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We are concerned that no alternative includes the option for "no artificial reefs" and "no hatcheries" in the Enhancement category. This seems to be in conflict with WDFW's own scientific research. We strongly encourage WDFW to add and adopt an alternative that does not rely on artificial reefs and hatcheries as a means of enhancement.

We appreciate the considerable effort the Department has spent on the draft Puget Sound Rockfish Conservation Plan. The Plan must provide an important step forward to address the many challenges facing rockfish in Puget Sound, but it will require some changes to get there. We look forward to working with WDFW and the rockfish advisory group in the coming months.

Sincerely,

Ginny Broadhurst
Director, Northwest Straits Commission

Jonathan White
Chair, Northwest Straits Commission

Northwest Straits Commission
10441 Bayview-Edison Road
Mount Vernon, WA 98273

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Ground fish written comments, Ken Kumasawa

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My name is Ken Kumasawa, and I have rewritten part of the Puget Sound Rock Fish Conservation Plan from my Gestalt Wholeness perspective as I perceive it from information I have read, the current written plan and comments heard in two comment meetings.

I look at Ground Fish conservation as I do Anadromous Fish, conservation, enhancement and sustainability from a Gestalt Wholeness. The following is my definition of Gestalt Wholeness, the italics are my additions.

"We go from the world of *Mother Nature's* everyday events to that of *fishery management (Co-management)* science, and not unnaturally assume that in making this transition we shall gain a deeper and more precise understanding of essentials. The transition should mark an advance. And yet, though one may have learned a great deal, one is poorer than before. ..... Here too we find *fishery management (Co-management)* science intent upon *using* a systematic collection of data, yet often excluding through that very activity precisely that which is most vivid and real in the living *natural* phenomena, *ground fish the fish, it proposes to manage to sustainability.* Somehow the thing that matters has eluded us." (Gestalt Theory, Max Wertheimer 1924)

This conservation plan should be written with a fifty to one hundred year recovery goal in mind, scientific research coordination with other recovery plans and low economic impact to the citizens and the State of Washington.

The Rock Fish plan should mesh with other plans with projects dependent on accomplishing targeted research with measurable, achievable, and timed results. Much like a pyramid the base is comprised of the eight areas identified to build a solid base of information and each project building layer upon layer leading to the pinnacle point, rock fish conservation, enhancement, and sustainability. Along with NOAA research for the TOTAL marine life in Puget Sound, there can be economies of effort expended.

Prior to the arrival of what we know as western civilization to the Pacific Northwest, the Native American people lived symbiotically with a balanced Nature, using the seasons, migrations, and natural resources in a utilitarian, reverent and respectful manner. Nature's bounty provided for the daily needs of the Native American community. The arrival of settlers increased the need for the daily necessities from Natures larder but also brought with it the business opportunities to harvest from Natures Bounty. The enlargement of the human population necessitates human intervention in the recovery with well thought comparisons of how human intervention will help and when not to help.

Thank you for this time,

Ken Kumasawa
925-360-5092
Kumasawa3569@msn.com

Anadromous and Marine Resources Sport Fishing Advisory Group member, WDFW
PSA Groups, Save Our Fish,- South King County,- Lake Washington Chapters
Member CCA

State of Washington

Ken Kumasawa

Department of Fish and Wildlife

Mailing Address: 600 Capitol Way N, Olympia WA 98501-1091, (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA

October 19, 2009

Dear Interested Parties:

The Washington Department of Fish and Wildlife (WDFW) has published a Draft Environmental Impact Statement (DEIS) titled: Puget Sound Rockfish Conservation Plan (PSRCP). WDFW has prepared this Draft Environmental Impact Statement (DEIS) in compliance with the State Environmental Policy Act (SEPA) and other relevant state laws and regulations. The draft plan together with the DEIS is now available for a 30 day public review.

Public Meetings for discussion of this Plan and DEIS are being held at the following locations:

Place	Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date	October 29, 2009
Time	7:00 pm to 9:00 pm
Place	Commons Room University of Washington, Friday Harbor
Date	November 2, 2009
Time	12:00 to 2:00 pm
Place	Room 172 Natural Resources Building, 1111 Washington Street, Olympia
Date	November 4, 2009
Time	7:00 pm to 9:00 pm
Place	Raven Room Skookum Inc, 385 Benedict St, Port Townsend
Date	November 6, 2009
Time	4:00 to 6:00 pm

COMMENT	NUMBER OF TIMES MADE	DEPARTMENT RESPONSE

Agencies, affected tribes, and members of the public are invited to review and comment on this DEIS. We must receive your comments within 30 days of the date of issuing this DEIS. *This means we must receive your comments no later than 5pm on November 19 2009. See Fact Sheet for details on availability and commenting.*

MAJOR CONCLUSIONS

This is a phased non-project review of a phased project management plan proposal. The goal of the PSRCP is to describe a project oriented framework to last 50 to 100 year in order to restore and protect our natural heritage of Puget Sound rockfish populations. To attain this goal, the Washington Department of Fish and Wildlife has developed eight action areas to which identified research projects will be applied and developed in building block style to develop a range of policies, strategies, and actions based on and after review of the best possible scientific evidence, that will help restore and maintain rockfish abundance, distribution, diversity, and long-term productivity in their natural habitats and will also foster recreational and economic opportunities. The plan also offers a Gestalt (wholeness of Natures Puget Sound) framework for state ~~rock~~fish managers to follow in developing detailed regulations, establishing priorities, and providing guidelines for the development of additional plans with co-managers.

AREAS OF CONTROVERSY AND UNCERTAINTY

As part of the wholeness of Natures Puget Sound, the plan, includes an adaptive/reactive management plan to be in place, assuring that all stakeholders are consulted to avoid controversy and uncertainty, ~~The~~ the PSRCP proposes eight categories of actions. 1- Natural Production, 2- Habitat 3- Fishery Management 4- Ecosystem Effects Evaluation. 5- Monitoring and 6- Adaptive Management 7- Research 8- Outreach

Any one of the eight action areas could elicit outrage and protests if regulations and policies are established without directed specific scientific research to validate proposed regulations and policies. To mitigate controversy it is the intent to involve volunteers from the knowledge pool of citizens to assist in research projects which will result in regulation/policy proposals in order to validate implementation.

~~1 Fishery management the PSRCP proposes a strategy which could reduce fishing opportunities for rockfish and other species.~~

~~2 Habitat restoration enhancement the PSRCP proposes a strategy to consider restoration of degraded rockfish habitat and creation of new habitat for rockfish. This strategy could have adverse impacts on other animals.~~

~~3 Hatchery production of rockfish the PSRCP proposes development of hatchery production that could be used to restore rockfish population. The plan does not propose a hatchery program that would be used to sustain fisheries for rockfish at levels higher than can be supported naturally.~~

WDFW believes this DEIS in emphasizing considering the whole (Gestalt of Natures Puget Sound), scientific research, and involving knowledgeable citizens, will assist decision makers to identify the key environmental issues, and options associated with ~~this~~ the eight action areas of the plan. Based on comments received from agencies and interested parties during public review of this draft document, WDFW will prepare and distribute a Final Environmental Impact Statement (FEIS). The FEIS will be released in 2010.

Sincerely,

Teresa A. Eturaspe

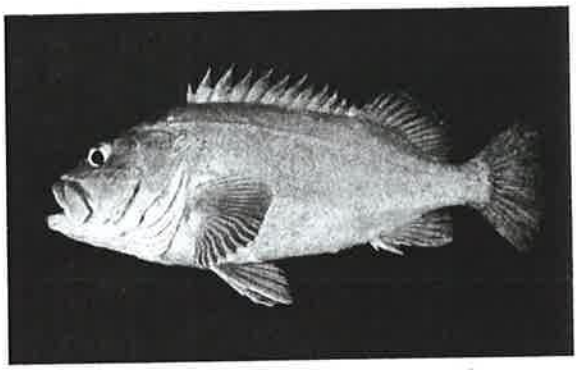
SEPA/NEPA Coordinator
Agency Responsible Official
Regulatory Services Division
Habitat Program

DRAFT

Environmental Impact Statement for the

Puget Sound Rockfish Conservation Plan

Including Preferred Range of Actions



LEAD AGENCY

Washington Department of Fish and Wildlife
Fish Program Natural Resources Building, 6th
Floor 1111 Washington Street Southeast
Olympia, WA 98501-1091

October, 2009

Title: Puget Sound Rockfish Conservation Plan (PSRCP) Draft Environmental Impact Statement (DEIS)

FACT SHEET

Description: This is a ~~phased~~ non-project review of a phased project management plan proposal. Phased review allows agencies and the public to focus on issues that are ready for decision (this plan) and excludes from consideration issues already decided or not yet ready and will suggest possible action items for research from current information available. To ensure healthy stocks of rockfish populations in Puget Sound, the Washington Department of Fish and Wildlife (WDFW) proposes a project oriented plan framework to last 50 to 100 year, a PSRCP that includes eight action areas to which identified research projects will be applied and developed in building block style to develop a range of policies, strategies, and actions based on and after review of the best possible scientific evidence that the research has gathered, ~~that~~ will help restore and maintain rockfish abundance, distribution, diversity, and long-term productivity in their natural habitats and will also foster recreational and economic opportunities. The plan also offers a Gestalt (wholeness) framework for state ~~rock~~fish managers to follow in developing detailed regulations, establishing priorities, and providing guidelines for the development of additional plans with co-managers.

Location: Puget Sound, including Hood Canal, the San Juan Islands, and the Strait of Juan de Fuca. (Thurston, Pierce, King, Snohomish, Skagit, Whatcom, Island, San Juan, Mason, Jefferson and Clallam Counties)

Proponent and Lead Agency:

Washington Department of Fish and Wildlife (WDFW)
Fish Program 600 Capitol Way North Olympia, WA
98501-1091

EIS Project Manager: Greg Bargmann, (360) 902-2825

WDFW Responsible Official:

Teresa A. Eturaspe, SEPA/NEPA Coordinator
Washington Department of Fish and Wildlife 600
Capitol Way North Olympia, WA 98501-1091

Natural Resources Building, 5th Floor
Phone: (360) 902-2575 Email:
SEPAdesk2@dfw.wa.gov

Permits and Licenses Required: None required

Authors and Principle Contributors:

Washington Department of Fish and Wildlife

Greg Bargmann, Wayne Palsson, Craig Burley, Henry Cheng, Darren Friedel, Theresa Tsou , and Interested Concerned Citizens of the State of Washington.

Date Issued: The DEIS is available for review and download beginning October 19, 2009 on WDFW's website at: http://wdfw.wa.gov/hab/sepa/sepa.htm

If you prefer a printed copy or you would like a CD copy of the DEIS (supplies limited), please contact the Fish Program at (360) 902-2844.

DEIS Comment Period: Agencies, affected tribes, and members of the public are invited to review and comment on this DEIS. We must receive your comments within 30 days of the date of issuing this DEIS.
This means we must receive your comments no later than 5PM on November 19, 2009 .

You can submit your comments by email to SEPAdesk2@dfw.wa.gov, through the WDFW SEPA website comment link at http://www.wdfw.wa.gov/hab/sepa/sepa.htm fax to (360) 902-2946, or mail to the address below. When you send us your comments, please include the name of the proposal in your comment letter:
"Puget Sound Rockfish Conservation Plan DEIS" **Mail comments to:** Responsible Official: Teresa A. Eturaspe, SEPA/NEPA Coordinator, 600 Capitol Way North, Olympia, WA 98501-1091

Meetings for Public Participation:

Contact: Greg Bargmann at (360) 902-2825

Public meetings for discussion of this Plan and DEIS are being held at the following locations and dates:

Place Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date October 29, 2009 Time 7:00 pm to 9:00 pm

Place Commons Room University of Washington, Friday Harbor
Date November 2, 2009 Time 12:00 to 2:00 pm

Place Room 172 Natural Resources Building, 1111 Washington Street, Olympia Date November 4, 2009 Time 7:00 pm to 9:00 pm

Place Raven Room Skookum Inc, 385 Benedict St, Port Townsend
Date November 6, 2009 Time 4:00 to 6:00 pm

Date Final Action is Planned: The Final Environmental Impact Statement (FEIS) on the PSRCP will be released in 2010.

Date of Next Action and Subsequent Environmental Reviews:

The Final Environmental Impact Statement (FEIS) is a phased non-project action. The PSRCP will be provided to the Director of the Washington Department of Fish and Wildlife (WDFW) for action in 2010. Future phased agency actions are anticipated as detailed regulations are developed for specific water basins.

Background Data and Materials Referenced in the DEIS are Available at:

Washington Department of Fish and Wildlife, Fish Program, Natural Resources Building, 6th Floor, 600 Capital Way North, Olympia, WA 98501-1091

Distribution List:

Notice of the availability of this DEIS is posted on the WDFW SEPA website: http://wdfw.wa.gov/hab/sepa/sepa.htm. Copies have been sent to all local government planning departments (city and county); affected Tribes; all state and federal agencies with jurisdiction; selected environmental organizations and interested parties.

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Chapter 1. Executive Summary

1.1 State Environmental Policy Act Process Overview

OK 1.1.1 Introduction

The Washington Department of Fish and Wildlife (WDFW) recognizes the importance of the State Environmental Policy Act (SEPA) in the process of adopting the Puget Sound Rockfish Conservation Plan (PSRCP- Appendix 1). The environmental impact statement (EIS) process provides opportunities for other agencies, stakeholders, tribal governments, and the public to participate in developing and analyzing information. This process, as detailed in WAC197-11, helps ensure that WDFW understands all the environmental (including environments not considered when WAC 197-11 was drafted) consequences of its decisions and considers mitigation of probable significant adverse environmental impacts

- Scoping
- Preparing a draft EIS (DEIS), which analyzes the probable impacts of a proposal and reasonable alternatives
- Issuing a DEIS for review and public comment
- Preparing a final EIS (FEIS), which includes analyzing and responding to comments received on the DEIS
- Issuing a FEIS
- Using the FEIS in decision-making.

State Environmental Policy Act processes have been used to ensure public input into policy development. Key steps in the policy development process have been:

1. A Scoping notice was sent to approximately 110 individuals and interested groups in August 2008.

OK 1.1.2 Alternatives

The symbiotic relationship of the ancestors of the Treaty Tribes with Mother Nature was impacted by the westward migration of Western Civilization. Where once Mother Nature's seasons and rhythm governed natural processes, Western man altered the balance established in nature. This PSRCP seeks to assist Mother Nature recover through measurable efforts to reduce harmful impacts brought on by unintentional activity, ignorance, deliberate acts and well intended activities.

Considering the current and anticipated factors affecting the rockfish resource, the PSRCP will consist of eight action areas to which identified research projects will be applied and developed in building block style to develop a range of policies, ~~a set of~~ strategies, and actions based on and after review of the best possible scientific evidence that the research has gathered. to address WDFW's mandate to conserve rockfish populations while secondarily to provide opportunities to view rockfish in their natural setting and to providing sustainable fishing opportunities ~~where appropriate~~. This DEIS will focus on analyzing current research, suggesting for research a range of ~~reasonable~~ measurable achievable project alternatives to assess their risk of possible significant impact to elements of the environment or with the ability ~~and~~ to identify mitigation measures that would avoid or minimize related adverse environmental and economic impacts.

Alternative strategies based on scientific research are one of the required components of an EIS. They present meaningful scholarly Puget Sound options for the Department to consider in managing rockfish in Puget Sound. Policy proposals to be considered by WDFW are presented in the set of reasonable alternatives categorized in Table 3 and described in Chapter 3 of this DEIS. These alternatives present policy choices consistent with the purpose and need of the PSRCP as described in section 1.2 and relate each choice to the environmental impacts identified in this DEIS in Chapter 3. This process used the environmental checklist

called for in WAC 197-11- 444, and provided in WAC 197-11-960, as the basis for determining any potential environmental impacts resulting from the approval and implementation of the PSRCP non-project action.

The alternatives incorporate information gathered and issues raised through the SEPA scoping process and public comment period. The specific alternatives discussed in Chapter 3 for the eight policy subject areas can be grouped across a spectrum from most conservative for rockfish to least conservative, into four generalized alternatives (Table 3):

1) The **most-conservative** alternative seeks to provide maximum conservation efforts, the initiation of action efforts in all eight areas to accelerate the rate of rebuilding rockfish populations to healthy levels of abundance. Research efforts would be increased, as would outreach and education efforts. Habitat protection and restoration efforts would increase. Significant efforts to develop rockfish culture and development of the use of artificial habitats would be considered. ~~This could require significant reductions in fishing opportunities for other species, including salmon, lingcod, and halibut.~~

2) The **conservative** alternative seeks to provide increased rates of rockfish rebuilding and maintenance of healthy populations. ~~while providing limited fisheries for rockfish.~~ Targeted measurable scientific ~~R~~research is conducted and from results projects are applied in the other seven action areas to build on ~~habitat protection, habitat restoration and public education would be increased over~~ present levels of effort. This alternative would require ~~limited~~ research effort ~~to~~ developed from ~~the use of~~ current rockfish knowledge. ~~culture or artificial habitat in rockfish management.~~

3) The **status quo** (no action) alternative seeks to maintain our current approach and emphasis of achieving balance in conservation and utilization needs.

4) The **least-conservative** alternative addresses the feasibility of increasing recreational opportunity while preserving rockfish stocks. Emphasis would be placed on maintaining or increasing fishing opportunities for rockfish and other species. This alternative is predicted to increase the time and decrease the probability of meeting conservation and recovery objectives, when compared to the other alternatives.

A summary of each alternative, across all of the policy categories, is provided in Chapter 3.

While all research for rockfish is important, this plan will rely on specific research producing best scientific results related to the Puget Sound first in decision and policy making and second, use research conducted elsewhere and determined significant to the plan, policy or regulation being proposed.

OK 1.1.3 Non-Project Proposal

The PSRCP is considered to be a "non-project action" under SEPA (WAC 197-11-442). Non-project actions include the adoption of plans, policies, programs, or regulations containing standards that will guide future actions. The probable significant adverse

environmental impacts analyzed in a non-project EIS are those impacts foreseeable at this stage, before specific project actions are planned. If more specific actions are needed in the future, best possible science from Puget Sound research will be used to make management decisions which will be guided by the policies developed during this process.

OK 1.1.4 Scoping

Scoping initiates public involvement in the SEPA process. Its three purposes are to:

- Narrow the focus of the EIS to significant environmental issues;
- Eliminate insignificant impact issues or those not directly related to the proposal; and
- Help identify reasonable alternatives, consistent with the purpose and need of the proposed action, to be analyzed in the EIS.

The scoping process alerts the public, the project proponent, and the lead agency to areas of concern and potential controversy early in the process. Here, WDFW is both the project proponent and the lead agency. The SEPA process for the PSRCP was formally initiated in 2008 with the publication of the Scoping Notice. In addition to the formal scoping process, Department staff met with tribal co-managers in May 2008 to discuss rockfish conservation strategies. XXXX What results? XXXX

OK 1.1.5 Next Steps

After issuing this DEIS, WDFW will hold public meetings in Olympia, San Juan County, Mill Creek, and Port Townsend, Washington. These meetings will allow the public to ask questions and give comments on the DEIS and the draft plan. The public meetings are scheduled for 2009. It is anticipated that interested individuals and stakeholders will attend these public meetings and provide comments to WDFW on the DEIS. Those comments will be reviewed and responded to in the FEIS, which is expected to be completed in 2010. The FEIS will include the necessary information to allow the director of WDFW to decide which policies will be adopted in the PSRCP. Upon approval of the PSRCP and FEIS, WDFW will have updated working policies to guide management of rockfish throughout Puget Sound.

1.2 Purpose and Need for the Non-Project Action

OK 1.2.1 ~~Purpose~~ Goal

Consistent with the Scoping Document, the ~~purpose~~ goal of the PSRCP is to restore ~~and protect~~ our natural heritage of Puget Sound rockfish populations. Increase~~s~~ing ~~in~~ the abundance, distribution, diversity and productivity of the five key threatened or depleted rockfish in general with goal oriented objective based research will help restore the Puget Sound ecosystem, and provide recreational opportunities. ~~to view rockfish in the marine environment and, when appropriate, provide sustainable fishing opportunities.~~

The rockfish conservation plan is needed in order to protect and restore the diversity and long-term productivity of rockfish and in particular the five key depleted or threatened stocks throughout Puget Sound. WDFW will accomplish this goal objective oriented plan with the guidance from relevant state and federal government bodies, legislation, treaties, the Department's mission statement, its strategic goals and objectives, and Washington

Fish and Wildlife Commission policies, including the existing Puget Sound Groundfish Management Plan (Palsson *et al.* 1998). WDFW will work with tribal governments and Federal Agencies to ensure fish and wildlife management objectives are met, including sustaining ceremonial, subsistence, commercial, and recreational fisheries, and providing non-consumptive fish benefits and other cultural and ecological values.

Expectations are increasing for fish managers to balance varied public needs to maintain and restore natural stocks, provide sustainable fishing opportunities, fulfill treaty responsibilities with tribal governments and support additional important environmental values such as a healthy Puget Sound marine ecosystem. WDFW will develop the PSRCP to guide the evaluation and development of WDFW's eight action areas 1- Natural Production, 2- Habitat 3- Fishery Management 4- Ecosystem Effects Evaluation, 5- Monitoring and 6- Adaptive Management 7- Research 8- Outreach and education ~~harvest, research, habitat, and outreach and education programs~~ to aid in the conservation and restoration of natural rockfish stocks and provide harvest opportunity consistent with conservation objectives. WDFW must also identify information gaps and develop research and monitoring programs to improve rockfish management decisions.

The draft PSRCP specifies preferred ~~range~~ plans of actions to achieve the goal of the plan. There are eight policy categories to the plan, each with its objective. The WDFW is now inviting comments from the public and others on each of the preferred objectives. The complete name of the plan is the "Draft Puget Sound Rockfish Conservation Plan with Preferred Range of Actions". However, for clarity, this document refers to the plan as the "Draft Puget sound Rockfish Conservation Plan."

OK 1.2.2 Plan Objectives

The objectives for the PSRCP (Appendix 1) are as follows:

1. Provide a Gestalt (wholeness of Natures Puget Sound) framework of policies, strategies and actions for state fish managers to follow in developing detailed regulations, establishing priorities, and providing guidelines for preserving healthy stocks of rockfish in Puget Sound by restoring and ~~maintaining~~ enhancing their abundance, distribution, diversity and long-term productivity in ~~their natural~~ Puget Sound habitats;
2. Seek to ~~maintain~~ enhance rockfish populations throughout Puget Sound and to achieve cultural, economic, and ecosystem benefits for current and future residents of Washington State in a manner consistent with the primary conservation, enhancement, and sustainability goal;
3. Meet with appropriate groups and work for voluntary change in ~~all~~ federal and state laws, including practices exercised under treaty obligations;
4. Ensure policies are succinct, relevant, based on scientific Puget Sound research, and easily understood by the public and Department employees;
5. Seek productive partnerships that help the WDFW achieve policy objectives;
6. Use the best available Puget Sound science, sound fisheries management, and collective professional judgment to achieve excellence in stewardship of public resources; and
7. Monitor and periodically change previous policies and regulations if warranted and report to the Washington Fish and Wildlife Commission and the public on the implementation and outcomes of Commission-approved policies.

OK 1.3 Issues Identified Through Scoping

WDFW received twelve responses to the Scoping Notice: three from organizations and nine from individuals. These comments contained a wide range of suggestions and are

Table 1. Summary of Comments Made in Scoping Process.

Place	Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date	October 29, 2009
Time	7:00 pm to 9:00 pm
Place	Commons Room University of Washington, Friday Harbor
Date	November 2, 2009
Time	12:00 to 2:00 pm
Place	Room 172 Natural Resources Building, 1111 Washington Street, Olympia
Date	November 4, 2009
Time	7:00 pm to 9:00 pm
Place	Raven Room Skookum Inc, 385 Benedict St, Port Townsend
Date	November 6, 2009
Time	4:00 to 6:00 pm

COMMENT	NUMBER OF TIMES MADE	DEPARTMENT RESPONSE
Create underwater parks/marine protected areas as part of rockfish management	3	Considered in Plan
Consider climate change in recovery plan	5	Considered in Plan
Adopt a precautionary approach	1	Considered in Plan
Utilize adaptive management	1	Considered in Plan
Expand monitoring of rockfish to juvenile life stages	1	Considered in Plan
Review effectiveness of existing policies	1	Considered in Plan
Include outreach and education as part of management plan	1	Considered in Plan
Identify important rockfish habitat	1	Considered in Plan
Study rockfish discards (i.e., effect of 1 fish bag limit)	1	Considered in Plan
Consider bycatch in other fisheries	1	Considered in Plan

1.4 Summary of Initial Environmental Impact

The PSRCRP is a **non-project action** intended to provide guidelines for improving the management, status and utilization of rockfish in Puget Sound, Washington. It develops policies that are intended to address WDFW's dual mandates to conserve and enhance the wild rockfish resource and to provide utilization opportunity to the citizens of the state (RCW 77.040.12). Considering the current and anticipated factors affecting the rockfish resource, a key element of the plan is to emphasize conservation and rebuilding of rockfish populations.

Depending on ~~T~~the type ~~establishment~~ of new guidelines established to manage rockfish populations and harvest opportunity, the impact could be economically significant and detrimental to other plan objectives and affect recreational opportunities. ~~is not expected to have direct adverse environmental impacts in itself~~.

However, if the PSRCP is approved as proposed, it is likely that specific project actions will be recommended to achieve some of the strategies. This initial review was conducted to set the framework for the more detailed evaluation of potential environmental impacts associated with any subsequent actions. Environmental review of subsequent actions will refer to this document.

The review of the initial impact was conducted using the format provided by State Environmental Policy Act (WAC 197-11-960) which provides an environmental checklist of elements to be considered in an EIS. We reviewed the initial likely environmental impact on each of the elements (Table 2).

Table 2. Environmental Impact Potential Review Summarized By Element:

The elements in UPPER CASES (#5 and #12) are addressed in this DEIS because the intent of the PSRCP is to focus on strategies affecting rockfish populations, habitat, and harvest. Items in **bold,** but not in upper case, indicate other possible elements which may be affected by this plan but are judged to be non-significant. Items in bold may be impacted by future actions and will be included in environmental reviews of such action to be considered during watershed plan development.

1. Earth
   - No clearing, grading or filling. **Potential impacts to the seafloor of Puget Sound if habitat restoration or habitat construction activities are implemented.**
   - No additional impervious surface due to construction activity.
   - **Potential reduction of access and fishing related impacts in some areas.**
   - Normal stream flow into Puget Sound will continue to introduce silt containing potential toxins through this normal deposition of eroded material.
2. Air
   a. **Quantities of emissions from fishing related boating activity will likely decrease to a small degree.**
   b. Continued emission outfall from automobiles and businesses in the Sound could continue or increase introducing emission toxins.
3. Water
   - No dredge or fill operations in surface waters.
   - In-channel monitoring and evaluation activities are conducted during normal stream flow and under established protocols.
   - No groundwater withdrawal or discharges into ground.
   - No activities to affect surface runoff flow or quality.
   - Water quality reaching the Sound from river sources are suspect to carry toxins detrimental to fish.
4. Plants
   - No removal or alteration of existing vegetation.
   - ~~No additions to existing vegetation.~~
   - ~~Planned projects of adding or restoring habitat condusive to rockfish will be initiated to enhance the natural process of reproduction.~~

5. ANIMALS

a. Some rockfish species are proposed to be listed under ESA as being Threatened or Endangered.

b. For all species, the plan will be in compliance with the ESA process to allow fisheries and incidental take. The process includes utilization of 4

(d) rules.

c. The primary purpose of the plan is the preservation and improvement of rockfish populations and other Puget Sound marine life including their ecosystems.

6. Energy and Natural Resources

- No change in energy use requirements as a result of this plan.
- Will not affect alternative energy projects or potential use.

7. Environmental Health
   - **No change in the amount of distribution of fishing effort.**
   - No new special emergency services required.
   - **Reduced fishing or boating activity in some areas would decrease the overall noise level.**

8. Land Use and Shoreline Use
   - No structures demolished.
   - No introduction or displacement of people.

9. Housing
   a. No housing introductions or eliminations.

10. Aesthetics
   a. No aesthetics impact (degraded or blockage of views).

11. Light and Glare
   a. No light or glare impacts.

12. RECREATION
   - **Fishing restrictions could reduce or modify some recreational fishing opportunities.**
   - **Recreational fishing would be allowed when/where appropriate, as outlined in the plan.**

13. Historic and Cultural Preservation
   a. No environmental impacts.

14. Transportation
   - Proposal will not affect existing state of Washington transportation infrastructure.
   - **Vehicular trip reduction possible to a minor degree.**

15. Public Services
   a. No environmental impacts.

16. Utilities
    a. No environmental impacts.

1.5 Summary Table of Alternatives by Policy Area

The four alternatives discussed in section 1.1.2 were used to address each of the eight policy areas covered in the Plan:

Natural Production Habitat Fishery Management
Ecosystem Effects Evaluation, Monitoring and
Adaptive Management Research Outreach and
Education Enhancement

The DEIS contains an analysis of all four alternatives for each of the eight policy area resulting in a total of 32 alternate strategies. The DEIS indicates which of the four alternatives is the preferred alternative for each policy area. The selection of the preferred alternative was based on meeting plan objectives while minimizing adverse environmental impacts. While all of the policy areas further the goal of the PSRCP, none is sufficient by itself to address all of the objectives.

The 32 alternatives are shown in Table 3 and an analysis of each alterative is presented in Chapter 3. The approved option will be used to provide a framework to achieve the goal of the PSRCP.

Table 3. Range of Policy Options Proposed For Puget Sound Rockfish Recovery Plan. The preferred option is indicated in bold.

	RANGE OF ACTION		
POLICY CATEGORY	**ALTERNATIVE 1 MOST**	**ALTERNATIVE 2 CONSERVATIVE**	**ALTERNATIV NO-ACTION/ST**

Place Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date October 29, 2009
Time 7:00 pm to 9:00 pm

Place Commons Room University of Washington, Friday Harbor
Date November 2, 2009
Time 12:00 to 2:00 pm

Place Room 172 Natural Resources Building, 1111 Washington Street, Olympia
Date November 4, 2009
Time 7:00 pm to 9:00 pm

Place Raven Room Skookum Inc, 385 Benedict St, Port Townsend
Date November 6, 2009
Time 4:00 to 6:00 pm

COMMENT	NUMBER OF TIMES MADE	DEPARTMENT RESPONSE
Create underwater parks/marine protected areas as part of rockfish management	3	Considered in Plan
Consider climate change in recovery plan	5	Considered in Plan
Adopt a precautionary approach	1	Considered in Plan
Utilize adaptive management	1	Considered in Plan
Ecosystem monitoring of rockfish to juvenile life stages	1	Considered in Plan
Review effectiveness of existing policies	1	Considered in Plan
Include outreach and education as part of management plan	1	Considered in Plan
Identify important rockfish habitat	1	Considered in Plan
Study rockfish discards (i.e., effect of 1 fish bag limit)	1	Considered in Plan
Consider bycatch in other fisheries	1	Considered in Plan
Restrict fishing gear (e.g., downriggers, lures and depth)	1	Considered in Plan
Restrict fishing for other species (e.g., lingcod and halibut)	1	Considered in Plan
Rely on natural production for stock rebuilding (i.e., no rockfish hatcheries)	1 Based on reproduction information, alternatives to natural production will be considered	Considered in Plan
Propagate plankton to increase	1 while plankton is outside of	~~Outside the range of the~~

	RANGE OF ACTION			
POLICY CATEGORY	ALTERNATIVE 1 MOST	ALTERNATIVE 2 CONSERVATIVE	ALTERNATIVE 3 NO-ACTION/STATUS	ALTERNATIVE 4 LEAST
Monitoring, Evaluation, and Adaptive Management	Place Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek Date October 29, 2009 Time 7:00 pm to 9:00 pm Place Commons Room University of Washington, Friday Harbor Date November 2, 2009 Time 12:00 to 2:00 pm			
Research	Place Room 172 Natural Resources Building, 1111 Washington Street, Olympia Date November 4, 2009 Time 7:00 pm to 9:00 pm Place Raven Room Skookum Inc, 385 Benedict St, Port Townsend Date November 6, 2009 Time 4:00 to 6:00 pm			
Outreach and Education	**Conduct a comprehensive outreach and education program to inform Washington citizens of the value of rockfish populations in Puget Sound.**	Conduct a comprehensive outreach and education program to inform Washington fishers of the value of rockfish populations in Puget Sound.	3 popular articles, work with the media, use the rule-making process, and give public presentations on the importance of rockfish populations.	Considered in Plan
Enhancement (Artificial Reef and Hatchery Production)	Develop plans to: 1. Utilize hatchery production to assist in recovery of depleted rockfish populations consistent with natural production goals; and 2. Enhance habitat for all species of rockfish through the use of artificial habitat.	**Develop plans to:** 1. **Utilize hatchery production to assist in recovery of depleted rockfish populations consistent with natural production goals; and** 2. **Enhance habitat for key species of rockfish through the use of artificial habitat.**	Hatchery production for rockfish may be used to recover key depleted populations and for research. Artificial reef habitat will be considered on a case-by-case basis.	Artificial reef habitat will be implemented opportunistically with limited or no assessment.

COMMENT	NUMBER OF TIMES MADE	DEPARTMENT RESPONSE
Create underwater parks/marine protected areas as part of rockfish		inform the citizens of Washington of the value of rockfish populations in Puget Sound.

1.6 Key Relationships Within the Plan

The PSRCP proposes a series of policies, strategies and actions in eight categories. All of the categories are related and needed to achieve the goal of the PSRCP. For example, protecting and restoring rockfish populations will require protecting and restoring rockfish habitat and ensuring that fisheries management provides sustainable populations. Neither habitat protection or fisheries management alone will be sufficient to protect and restore rockfish in Puget Sound.

1.7 Significant Issues and Environmental Choices Among the Alternatives

1.7.1 Major Conclusions

During the preparation of this DEIS for this plan, an environmental checklist (Appendix 5) was used as an aid to determine the potential significant adverse impacts identified at the beginning of Chapter 3. Consistent with WDFW's dual mandates to conserve wild rockfish populations and provide utilization opportunities, the Department will address the potential impacts to animals and recreation through this DEIS (see Chapter 3 for the analysis.

It should be noted that the impacts evaluated in this DEIS relate to opportunity (fishing, observation, photography, etc.) and not impacts such as noise, transportation, energy use, etc., which are related to boat or other vehicle activity. Those impacts will be separately, for example, when evaluating existing road, infrastructure, marinas, and boat ramp construction projects.

1.7.2 Unavoidable Measures

No unavoidable significant-adverse environmental impacts were identified during the preparation of this DEIS. The intent of the PSRCP is to protect and, when necessary, restore rockfish populations to healthy levels. This intent does not include increasing rockfish populations to levels above historical, natural population levels.

1.8 Phased Review

SEPA review is required on proposals for project and non-project actions such as the PSRCP. WDFW will propose future project and non-project actions related to implementing the plan, such as planning site specific construction proposals. These more detailed actions may or may not require additional SEPA review. Actions that simply expand activities, but don't result in impacts outside the scope of those evaluated in this DEIS, will not require a separate SEPA review.

1.9 Alternatives Considered, But Not Analyzed

Under SEPA, a reasonable alternative is defined as "an action that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. Reasonable alternatives may be those over which

an agency with jurisdiction has authority to control impacts, either directly or indirectly " (WAC 197-11-786). For some policy subject areas, alternatives were considered, but not included in the detailed analysis, because they did not fully address the stated purpose and need of the PSRCP and were not considered to be "reasonable." Examples of alternatives which were considered but not analyzed include:

1. Maximizing harvest opportunities for rockfish;
2. Seeking methods to increase food supply of rockfish;
3. Intentionally decreasing abundance of rockfish predators to increase populations of rockfish;
4. Transplanting rockfish from outside Puget Sound into Puget Sound;
5. Implementing catch-and-release fisheries for rockfish; and
6. Implementing a temporary prohibition on all types of fishing which impact rockfish.

Chapter 2 Background

2.1 The Natural Environment

The natural environment considered in this DEIS includes all of the water and associated intertidal and subtidal substrate within Puget Sound. The natural environment includes plants and animals which may interact with rockfish in Puget Sound. The natural environment is common to all elements considered in the PSRCP.

2.1.1 Puget Sound

In this document "Puget Sound" refers to the marine waters of Washington State east of the Sekiu River and south of the Canadian-United States border, including all waters south to Olympia and Hood Canal (Figure 1). Although not stated in the PCRCP, the existing Puget Sound Groundfish Plan (Palsson *et al.* 1998) considers Puget Sound in two major areas or regions as follows.

> North Puget Sound: Those waters of the Strait of Juan de Fuca and the San Juan Islands. The western boundary is the Sekiu River (which is east of Cape Flattery); the northern boundary is the U.S.-Canadian border and the southern border is a line from Point Wilson (near Port Townsend) to Partridge Point on Whidbey Island.
>
> South Puget Sound: those marine waters south of the Point Wilson- Partridge Point line and east of Deception Pass. South Puget Sound includes the Whidbey Basin, Admiralty Inlet, Hood Canal, the central basin, and the southern basin of Puget Sound.

This geographical division is based largely on the stock identification of rockfish and by the major oceanographic patterns within the Sound. Although the Puget Sound Partnership recognizes seven action areas within the Sound, existing WDFW policy will manage rockfish by two large regions. This division into two areas represents a balance between benefits and costs of managing rockfish by smaller water basin or by larger region.

Figure 1. Map of Pugeet Sound shoowing managgement regioons.

2.1.2 Seensitive, Thhreatened and Endanngered Speecies

Puget Sound is homme to a widde variety oof animals wwhose contiinued existeence may bbe in jeopardyy. These species are listed undeer the federaal Endangeered Speciees Act (ESAA) or the Wasshington Staate speciess of concernn list (Tablee 4).

Table 4. Animals Found In Puget Sound That Are Listed In The Federal Endangered Species Listing Or In The List Of Washington Department Of Fish And Wildlife Species Of Concern ((WDFW 2009) With Possible Interaction With Rockfish

Place Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date October 29, 2009
Time 7:00 pm to 9:00 pm

Place Commons Room University of Washington, Friday Harbor
Date November 2, 2009
Time 12:00 to 2:00 pm

Place Room 172 Natural Resources Building, 1111 Washington Street, Olympia
Date November 4, 2009
Time 7:00 pm to 9:00 pm

Place Raven Room Skookum Inc, 385 Benedict St, Port Townsend
Date November 6, 2009
Time 4:00 to 6:00 pm

COMMENT	NUMBER OF TIMES MADE	DEPARTMENT RESPONSE
Create underwater parks/marine protected areas as part of rockfish management	3	Considered in Plan
Consider climate change in recovery plan	5	Considered in Plan
Adopt a precautionary approach	1	Considered in Plan
Utilize adaptive management	1	Considered in Plan
Expand monitoring of rockfish to juvenile life stages	1	Considered in Plan
Review effectiveness of existing policies	1	Considered in Plan
Include outreach and education as part of management plan	1	Considered in Plan
Identify important rockfish habitat	1	Considered in Plan
Study rockfish discards (i.e., effect of 1 fish bag limit)	1	Considered in Plan
Consider bycatch in other fisheries	1	Considered in Plan
Restrict fishing gear (e.g., downriggers, lures and depth)	1	Considered in Plan
Restrict fishing for other species (e.g., lingcod and halibut)	1	Considered in Plan
Rely on natural production for stock rebuilding (i.e., no rockfish hatcheries)	1 Based on reproduction information, alternatives to natural production will be considered	Considered in Plan
Propagate plankton to increase food supply	1 while plankton is outside of the plan other food and nutrients will be considered	Outside the range of the scoping notice and will not be considered
Restore eelgrass as rockfish	1 Other habitat restoration will	Considered in Plan

[1] E or T means listed an Endangered or Threatened under the federal Endangered Species Act, if preceded by a "P" it indicates that the listing status is potential. SE, ST, SC and SS means the species is listed on the Washington state Endangered, Threatened, Candidate or Sensitive list.

Place	Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date	October 29, 2009
Time	7:00 pm to 9:00 pm
Place	Commons Room University of Washington, Friday Harbor
Date	November 2, 2009
Time	12:00 to 2:00 pm
Place	Room 172 Natural Resources Building, 1111 Washington Street, Olympia
Date	November 4, 2009
Time	7:00 pm to 9:00 pm
Place	Raven Room Skookum Inc, 385 Benedict St, Port Townsend
Date	November 6, 2009
Time	4:00 to 6:00 pm

2.2 The Governing Environment

Authority for regulating rockfish, their habitats, and threats to their health and human use in Puget Sound is divided among many federal, tribal, state, and local (city and county) governmental entities (Table 5). Different entities are responsible for fisheries management, habitat, and water quality. The diffuse nature of regulatory authority requires at least the cooperation and participation of many management agencies to ensure success.

Table 5. Agencies with Authority Affecting Rockfish Conservation and Rebuilding Efforts.

Place	Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date	October 29, 2009
Time	7:00 pm to 9:00 pm
Place	Commons Room University of Washington, Friday Harbor
Date	November 2, 2009
Time	12:00 to 2:00 pm
Place	Room 172 Natural Resources Building, 1111 Washington Street, Olympia
Date	November 4, 2009
Time	7:00 pm to 9:00 pm
Place	Raven Room Skookum Inc, 385 Benedict St, Port Townsend
Date	November 6, 2009
Time	4:00 to 6:00 pm

COMMENT	NUMBER OF TIMES MADE	DEPARTMENT RESPONSE
Create underwater parks/marine	3	Considered in Plan

2.
3

Rockfish

Rockfish are members of the family Scorpaenidae and are members of the *Sebastes* or *Sebastolobus* genera. Rockfish are characterized by having spines on their head (at least at some stage during their development), stiff dorsal fins, and venom glands at the base of fins, internal fertilization of eggs, and birth of live larvae. Over sixty species of rockfish exist in the Pacific northwest and exhibit a wide range of differences: some species are dull colored; others are brightly colored. Some species school, others are solitary. Some species can exceed thirty pounds in weight, others never exceed a pound.

Rockfish have a variety of local names. Perhaps the most common name applied to local rockfish is "rock cod." Rockfish are also called "sea bass" (although they are not a member of the bass family) or "red snapper" (although they are not true snappers).

A total of 28 species of rockfish have been identified in Puget Sound, (Appendix 4) but some are very rare and uncommon (i.e., rougheye and silvergray). Others are found only in very specific areas of the Sound (i.e., blue and China rockfish). Other species are, or were, very common and provide valuable ecological functions and are included in commercial and recreational fisheries. Rockfish as a group are among the most common species of fish found in the Sound. They are year-round residents and can be found in nearly every area, depth, and habitat type. Many species of rockfish co-occur in the same habitats and depths (Moulton 1977, Love *et al.* 2002, Gunderson and Vetter 2006) and are similar in appearance, making species identification difficult. It is not unusual for a single fishing trip to land several species of rockfish, often caught at the same location and depth. The complex nature of the multi-species fishery and difficulties in identification makes fishery management challenging.

2.3.1 **Rockfish Life History and Biology**

Rockfish are some of the longest-lived fish known in Puget Sound, with maximum age for several species spanning more than 50 years. Rockfish mature as early as age 2, but ages at maturity from 6 to 11 years are common, and may be as old as 22 years for yelloweye rockfish.

Female rockfish give birth to free-swimming larvae, usually during the spring months. The larger the female, the greater the number of larvae produced. For example, female copper rockfish that are 8 inch (20 cm) in length produce 5,000 eggs while a female 20 inch (50 cm) in length may produce 700,000 eggs (Palsson *et al.* 2009). Recent research indicates that older female rockfish produce more competent larvae which have a greater chance of survival (Berkeley *et al.* 2004.) Currently, rockfish are commonly caught before they reach sexual maturity, eliminating their entire reproductive potential.

A dominant feature of rockfish reproduction is a pattern of infrequent and irregular successful recruitment and many years with poor recruitment (Hollowed *et al.* 1987,

[2] A detailed description of rockfish in Puget Sound is found in Palsson *et al.* 2009

Hollowed and Wooster 1995, Ralston and Howard 1995). Reproductive success may occur only during narrow spatial and temporal windows when conditions are favorable for larval survival.

Rockfish have swim bladders which contain gas that is slowly regulated to allow the fish to maintain buoyancy at various depths. However rockfish, unlike other species such as salmon, do not have a mechanism to rapidly expel gas from the swim bladder. When rockfish are brought to the surface, the gas within the bladder expands, causing internal injuries or death. The effects of rapid decompression include: over-inflation and rupture of the swim bladder; inability to submerge when released; exposure to predation and solar radiation; abnormal or erratic swimming behavior; gas embolisms in the blood vessel, gills, skin, and eyes; distortion of internal organs through the mouth; internal and external hemorrhaging; cloacal protrusions; and death (Kerr 2001, Meyer 2006, Parker *et al.* 2006, Rogers *et al.* 2008. Berry (2001) found clouded or bulging eyes in a third to more than half of quillback rockfish captured causing permanent eye damage. Parker *et al.* (2006) found that all swim bladders of tested black rockfish were ruptured when brought to the surface, but most survived at least a short time when quickly recompressed back to depth. Meyer (2006) performed pressure experiments on copper rockfish captured from northern Puget Sound and examined similar aspects of physiology. He found signs of depressurization stress when fish were brought to the surface from 10-, 20-, and 30-meter (33 to 100 feet) simulated depths, and these signs included hyper-inflated swim bladder, hyper-inflated pericardial chambers, and gas bladder rupture. Injuries are more severe with increasing capture depths. Fish captured from a simulated 10 meters (33 feet) did not die and might be safely caught and released. Fish captured from greater depths have life-threatening injuries. One of three captured from 20 meters (65 feet) died, and all fish captured from 30 meters (100 feet) died.

This facet of rockfish anatomy limits fishery management options due to the high mortality rates of released fish.

2.4 Rockfish Habitats

The term "habitat" refers to the physical, chemical, and biological conditions that support a species or species assemblage. The structural components of habitats are created and sustained by long-term physical processes such as tidal currents, human activities and also by habitat forming species such as eelgrass meadows and kelp forests.

2.4.1 Nearshore Vegetated and Rocky Habitats

The primary habitat for nearshore rockfish is composed of pebble, cobble, boulder, bedrock, and hardpan substrates that are continuous or isolated and form crevices or other structures to protect rockfish from currents and predators (Matthews 1990a, b, c Buckley 1997, Pacunski and Palsson 2002). In shallow waters of less than 18 meters (60 feet) in depth, rocky habitats are typically covered during the summer months with macroalgae including canopy and understory kelps, bladed and filamentous red and brown algae, and, in high energy environments, surfgrasses (Mumford 2007). These formations are important to the health of juvenile and adult rockfish as described above.

Demersal species that use these habitats include copper, quillback, brown, and tiger rockfish. Pelagic assemblage species also make use of these habitats, especially where there are steep drop offs. These species include black, yellowtail, and Puget Sound rockfish.

Copper, quillback, and brown rockfish have an affinity for natural rocky habitats with high relief. Most exhibit small home ranges of approximate 30 meters^2 (323 ft^2) and exhibit high site fidelity (Matthews 1990b, c). Less is known about the specific habitat associations and distributions of other adult rockfish species in Puget Sound.

2.4.2 Deep-Benthic Habitats

Deep-benthic habitats for rockfish primarily include boulder, bedrock, and hardpan outcroppings in waters deeper than 37 meters (120 feet). Deep-water habitats also include extreme slopes of unconsolidated substrates, or sand, shell, and cobble fields often located in the periphery of rocky outcroppings. These deep, unconsolidated habitats occur off many of the islands and points of the South Sound such as Camano Head, Possession Bar, Mukilteo, Jefferson Head, Point Edwards, Point Monroe, Skiff Point, Restoration Point, Blake Island, Southworth, Dalco Point, Tacoma Narrows, Fox and Ketron Islands, and along the steep walls of Hood Canal. In addition, quillback and other sedentary rockfish are found to lesser degrees on habitats composed of coarse and fine sediments. The more common occurrence of copper, quillback, and brown rockfish in the South Sound indicates that these species may make use of isolated shelters created by benthic debris, sunken logs, or benthic vegetation mats swept into deep basins from the nearshore.

2.4.3 Open-Water Habitats

Open-water habitats include the water column, both shallow and deep, and the surface waters that contain drift vegetation. This habitat may be segregated by the depth preferences of several rockfish species. Several schooling species such as yellowtail, redstripe, and widow rockfish characterize the deeper segments of this habitat. Schools of yellowtail rockfish occasionally occur in deep waters of the western Strait of Juan de Fuca and widow rockfish were found once off the southwest corner of San Juan Island (Miller and Borton 1980). In shallower waters, near pinnacles and steep walls, black and Puget Sound rockfish occupy open-water habitats.

The juveniles of some rockfish species make use of floating mats of vegetation in open water (Buckley 1997). These tend to occur throughout the North Sound and the northern portions of the South Sound and are often associated with tidal and other oceanographic fronts.

2.4.4 Artificial Habitats

Artificial habitats include piles of boulders, concrete wastes, tires, sewer pipes, breakwaters, shipwrecks, pilings, and other jettisoned or anthropogenic material not of natural geological origin. These structures mimic natural features of relief, crevice spaces, and settlement substrates for vegetation and invertebrates but may not provide equal functions as natural habitats. Artificial habitats include artificial fishing reefs that

were deployed to enhance fishing in the South Sound and urban habitats where rocky habitats were naturally limiting (Buckley 1982). WDFW created nine offshore artificial reefs and four urban reefs (and others were created by the Washington Department of Natural Resources (WDNR) and by illegal or accidental dumping. Some artificial habitats have been configured with smaller rock sizes than used on adult reefs in order to attract post-settlement rockfish (West *et al.* 1994, 1995, Buckley 1997).

Rockfish are found among artificial habitats (Matthews 1990a) and quickly colonize new artificial habitats soon after deployment. New habitats likely attract itinerant fish from the surrounding environment (Buckley and Hueckel 1985, Laufle and Pauley 1985), but how well the artificial reefs simulate the function of natural habitats is unclear. Matthews (1990b) found that home ranges are greater for rockfish living on artificial habitats than natural habitats, and fish living on artificial habitats are more likely to move to low-relief natural rocky habitats during the summer. In contrast, rockfish living on natural high-relief rocky habitats (vertical relief greater than two meters (6 feet)) apparently have more suitable conditions because they remain in smaller home ranges throughout the year. Moreover, most rockfish displaced from natural high-relief rocky habitats return to them after being displaced to artificial reefs, but rockfish displaced from artificial reefs to high-relief natural reefs do not return and remain at the high-relief natural habitats. These findings indicate that artificial habitats may not provide habitat of the same quality as natural habitats.

Artificial habitats have been suggested as a habitat mitigation tool for the loss of natural habitats because they attract concentrations of rockfish and other rocky habitat species (Hueckel *et al.* 1989). But issues of habitat quality, function, and replacement of underlying natural habitats may limit their use as replacement habitats.

2.5 Fisheries for Rockfish

Fisheries for rockfish have existed in Puget Sound for a long time, probably since humans first inhabited the region (Stewart 1977). Modern commercial fishing for rockfish and other species of bottomfish started in the 1920s and greatly increased in the 1970s and 1980s (Figure 2). This increase occurred in both northern and southern Puget Sound and in both recreational and commercial fisheries (Figure 3). The increase in landings was due to increased fishing effort, not to an increase in the abundance of rockfish (Palsson *et al.* 2009).

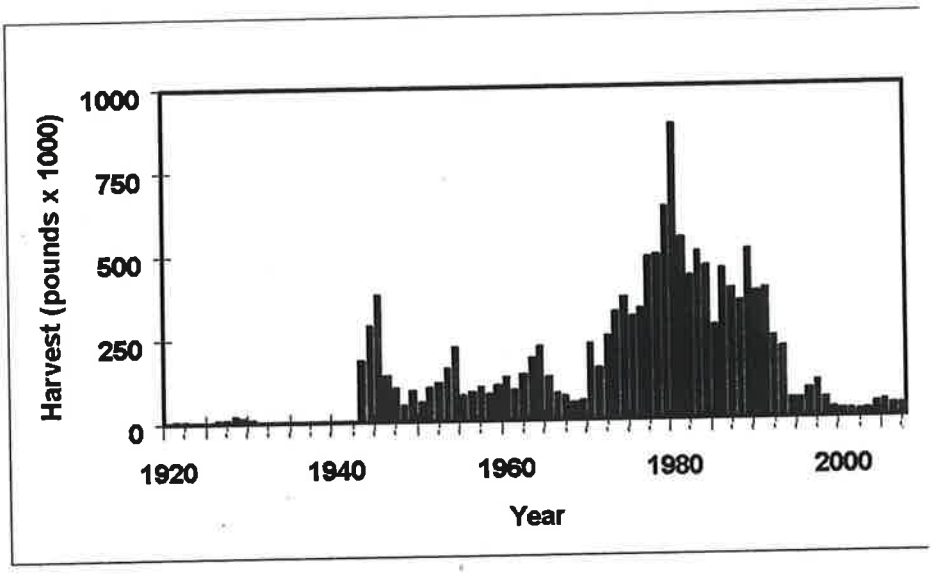

Figure 2. Estimated catch of rockfish in pounds from Puget Sound 1920 -2008. Source: Palsson, *et al.* 2009.

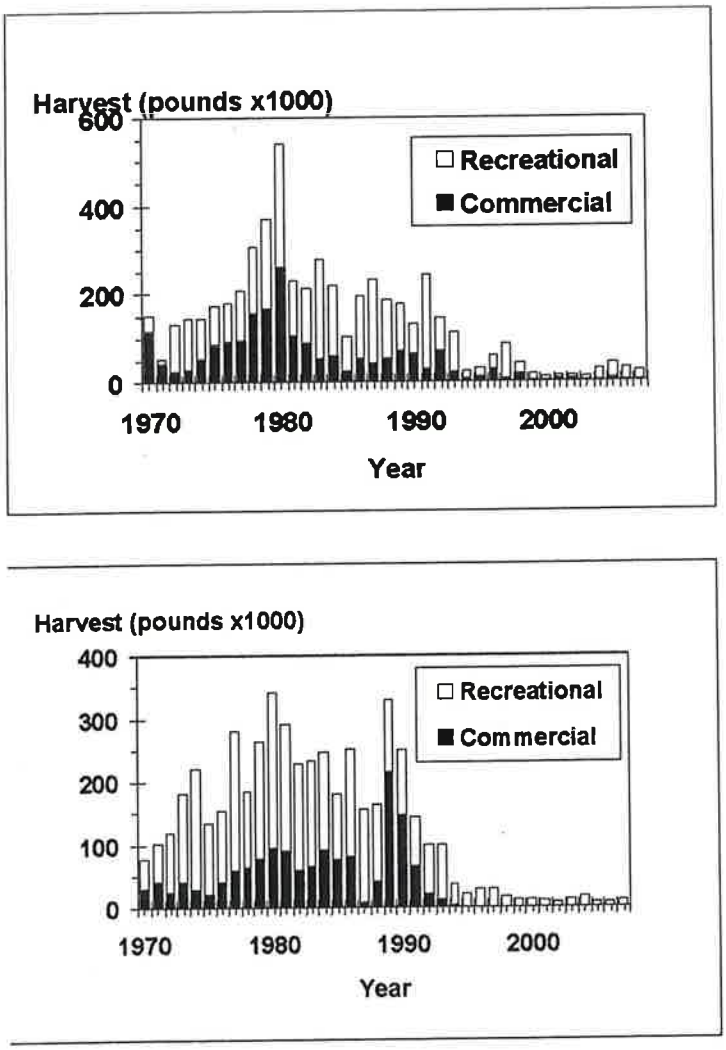

Figure 3. Annual catch of rockfish from Puget Sound. Northern Puget Sound is shown above and South Puget Sound, below. Source: Palsson *et al.* 2009

Since the 1980s, a series of management actions has been taken to reduce the impact of fishing on rockfish. These actions include the prohibition of certain gear types, imposition of daily or trip catch limits, and establishment of no fishing areas. No annual catch limits for any species of rockfish have been established in Puget Sound. These actions have reduced the size of the rockfish catch. In 2009, the annual catches of rockfish by both commercial and recreational fisheries are low, the lowest since complete record keeping began in the 1970s (Palsson *et al.* 2009).

2.5.1 Commercial Fisheries

Many different types of commercial fishing gear have been used in Puget Sound to catch rockfish. Some of this gear is designed to catch rockfish, and other types are designed to catch other species of fish such as salmon and flatfish, but may catch rockfish incidentally. The major commercial gear types which have caught rockfish, but are no longer allowed in Puget Sound, are roller trawl, handline jig and bottomfish troll.

Existing gears that may encounter rockfish incidentally are bottom trawl, set net and setline. Commercial fisheries are capable of operating at any depth in Puget Sound.

At present, the commercial catch of rockfish in southern Puget Sound is nearly zero and has been at that level since the early 1990s. In northern Puget Sound, a harvest of rockfish (primarily yellowtail) by trawl occurs regularly in the Strait of Juan de Fuca.

The catch estimates for commercial fisheries do not include estimates for rockfish encountered during commercial fishing operations and released at sea. No monitoring program exists with which to estimate the magnitude of this release rate. The amount of this release is thought to be low, but the mortality rate high (Palsson *et al.* 2009).

2.5.2 Recreational Fisheries

Several different types of recreational fisheries have captured rockfish. While recreational fishers undoubtedly sought and harvested rockfish prior to 1968 (Buckley 1967, 1968; Buckley and Satterthwaite 1970), consistent statistical surveys were not implemented to estimate total recreational harvests in Puget Sound until 1970, and early estimates indicated that recreational harvests of rockfish were minimal (Palsson 1988). Targeted rockfish fisheries have included the boat-based, hook-and-line fishery for bottomfish, the spearfishery and the shore-based hook-and-line fishery. By far, boat-based anglers account for the majority of harvested rockfish. Typically, these anglers target rockfish on areas of high, rocky relief. Anglers can fish to depths of more than 122 meters (400 feet) often on deep pinnacles or artificial structures. Using modern fishing gear and electronic aids, anglers can effectively fish at any depth or location in the Sound.

Anglers who fish specifically for bottomfish encounter rockfish. In addition rockfish, are encountered while fishing for halibut, lingcod and salmon (Table 6). Anglers fishing from shore occasionally catch rockfish using spinning gear and lures and baited hooks. However, the catch of rockfish tends to be minimal by shore anglers (Bargmann 1982). Divers spear rockfish, a sport that co-developed with the recreational diving. Divers using pole spears and spear guns have harvested rockfish in great numbers and can account for approximately a quarter of the total recreational harvest of rockfish in some areas and years (Bargmann 1984). More recent regulations restrict recreational fishing of rockfish with the imposition of a one-fish daily bag limit and the prohibition of spearfishing for rockfish.

In recent years (2004-2007), recreational anglers have encountered approximately 35,000 rockfish annually. Most of these are encountered by people fishing for bottomfish. Smaller numbers of rockfish are encountered by anglers fishing for salmon, halibut or other species of fish (Table 6). Considerable numbers of these rockfish are released. Of all rockfish encountered while recreational fishing in Puget Sound, nearly two-thirds are released. Anglers fishing for bottomfish released the largest number of rockfish, while salmon anglers released the highest proportion of their encountered rockfish (Table 6).

Table 6. Patterns of Rockfish Encounters in the Puget Sound Recreational Fishery, 2004-2007. Source : Palsson *et al.* 2009

Place	Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date	October 29, 2009
Time	7:00 pm to 9:00 pm
Place	Commons Room University of Washington, Friday Harbor
Date	November 2, 2009
Time	12:00 to 2:00 pm
Place	Room 172 Natural Resources Building, 1111 Washington Street, Olympia

Current management strategy is designed to: 1) minimize the catch of rockfish by reducing the bag limit to one fish per day and establishing fishing seasons for rockfish, and 2) minimize wastage by allowing anglers to retain one rockfish per day. The ongoing high rate of release in the recreational fishery remains a concern (Palsson *et al.* 2009).

2.5.3 Treaty Fisheries for Rockfish

Rockfish bones have been found in native middens and archeological studies have shown that Native Americans historically harvested several species of rockfish (Stewart 1977). By treaty, several tribal governments have the authority to authorize fisheries for rockfish and other species in Puget Sound. However, the amount of rockfish harvested by persons fishing under the authority of a tribal government has been very small in recent years. Rockfish harvested by tribal fishers have contributed less than 2 percent to the total Puget Sound harvest for most years since 1991. The annual harvested poundage was the greatest in 1992 at 15,600 pounds and in 1998 when 1,371 pounds were landed. In both of these peak years, trawl gear was the primary gear of harvest. During other years, harvests have ranged from none to approximately 500 pounds with troll and other gear being the dominant source of the landings.

2.6 Current Stock Status for Rockfish in Puget Sound

The PSRCP concludes that many stocks of rockfish are in poor condition. This conclusion is based on previous analysis conducted by WDFW staff (Palsson *et al.* 2009) which assigns rockfish stocks to one of the four following categories of stock status:

> **Healthy Stock Status**: A healthy stock is one that is stable or increasing and at, or above, historic levels of abundance. For healthy rockfish stocks, the reproductive biomass must be at least 50 percent of the biomass which produces the maximum sustainable yield (B_{MSY}). When an estimate of B_{MSY} is not available, proxies may be used.
>
> **Precautionary Stock Status:** Precautionary stocks are those that meet the Vulnerable Criteria but conservation and management measures are in place to halt, further decline or promote rebuilding. Alternatively, precautionary stocks are

those with spawning biomass less than 50 percent but greater than 25 percent of the B_{MSY}. When this information is missing, proxies may be used. A stock may be placed in this category when data are lacking and the stock status is unknown.

Vulnerable Stock Status: A vulnerable rockfish stock is one whose spawning potential has been reduced to less than 25 percent of the B_{MSY}, and there are no additional risk factors.

Depleted Stock Status: A depleted rockfish population far exceeds the Vulnerable Criteria and has a spawning potential or biomass much less than 25 percent of the B_{MSY} and the stock has additional risk factors such as rarity, limited range, or specialized habitat requirements. When this information is missing, proxy values may be used.

The stock assessment techniques were based on evaluation methods developed by the American Fisheries Society and modified to account for situations where the amount of information is limited (Palsson *et al* .2009).

The stock status of each species was evaluated for both regions of Puget Sound. The majority of rockfish stocks or populations in Puget Sound are in the Precautionary status, and several species once important to recreational fisheries are in the Vulnerable or Depleted status (Table 7). The patterns of stock status are generally similar between the two regions. Fewer than 20% of the populations present in either North or South Sound are in Healthy status.

Table 7. Summary of the Status of Rockfish Populations in Puget Sound. Source: Palsson *et al.*

Place	Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date	October 29, 2009
Time	7:00 pm to 9:00 pm
Place	Commons Room University of Washington, Friday Harbor
Date	November 2, 2009
Time	12:00 to 2:00 pm
Place	Room 172 Natural Resources Building, 1111 Washington Street, Olympia
Date	November 4, 2009
Time	7:00 pm to 9:00 pm
Place	Raven Room Skookum Inc, 385 Benedict St, Port Townsend
Date	November 6, 2009
Time	4:00 to 6:00 pm

COMMENT	NUMBER OF TIMES MADE	DEPARTMENT RESPONSE
Create underwater parks/marine protected areas as part of rockfish management	3	Considered in Plan
Consider climate change in recovery plan	5	Considered in Plan
Adopt a precautionary approach	1	Considered in Plan
Utilize adaptive management	1	Considered in Plan
Expand monitoring of rockfish to juvenile life stages	1	Considered in Plan
Review effectiveness of existing policies	1	Considered in Plan
Include outreach and education as part of management plan	1	Considered in Plan
Identify important rockfish habitat	1	Considered in Plan
Study rockfish discards (i.e., effect [illegible])	1	Considered in Plan

Stock condition is closely related to the frequency of a species entering the recreational catch, with the more commonly caught species being in poor condition, and smaller species, which are seldom caught, being in the healthiest conditions. Copper and quillback rockfish have been the two most important species in the recreational fishery, but three of four stocks are in Vulnerable or Depleted condition. Throughout Puget Sound, yelloweye and canary rockfish are in Depleted condition. Eleven species in North Sound and seven species in South Sound are in Precautionary status. These species, such as black, yellowtail, splitnose, and bocaccio, have been secondary species of importance in recreational and commercial fisheries.

This evaluation of stock status has many limitations, most notably the lack of complete recreational catch estimates between 1994 and 2003, the lack of information on the released portion of the rockfish encounters and the poor quality of species composition data from the commercial fishery, unknown influences of changing bag limits on the interpretation of the recreational catch rate trend, and the lack of age and other

biological data. Additionally, the analysis of stock status presumes that rockfish stocks in the early 1970s were at maximum levels and declines are measured from that time. However, almost certainly rockfish populations were not at their maximum in the 1970s, since harvest of rockfish had occurred for at least fifty years prior to that time. Thus, this analysis of stock condition may underestimate the real decline in abundance (Palsson *et al.* 2009).

2.7 Stressors and Limiting Factors

Potential stressors and limiting factors can negatively impact rockfish populations. Many stressors or threats to rockfish have been identified by West (1997). Those stressors and their potential to limit productivity and recovery of rockfish populations in Puget Sound are discussed in this section (Table 8). The likely known impact on productivity is rated as High, Moderate, or Low (Palsson *et al.* 2009). The definitions for each risk categories are as follows:

- High: The stressor has been documented to dramatically limit rockfish populations in Puget Sound or along the West Coast.
- Moderate: The stressor has been identified to cause direct mortality on local scales or to be a persistent factor but on a restricted scale.
- Low: The stressor has some potential to limit rockfish populations on a small scale or large scale, but the stressor has not been documented in Puget Sound.

Table 8. Likely Stressors Limiting Rockfish Populations in Puget Sound.

Place	Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date	October 29, 2009
Time	7:00 pm to 9:00 pm
Place	Commons Room University of Washington, Friday Harbor
Date	November 2, 2009
Time	12:00 to 2:00 pm
Place	Room 172 Natural Resources Building, 1111 Washington Street, Olympia
Date	November 4, 2009
Time	7:00 pm to 9:00 pm
Place	Raven Room Skookum Inc, 385 Benedict St, Port Townsend
Date	November 6, 2009
Time	4:00 to 6:00 pm

COMMENT	NUMBER OF TIMES MADE	DEPARTMENT RESPONSE

2.7.1 Past Fishery Removals

Fishing affects rockfish in both time and space, affecting sustainable populations. In Puget Sound, past fishing practices have decreased both the number of fish and the average age and size of fish. Recent studies clearly show declines in abundance of

many species of rockfish, and several of the most commonly fished species show an average declining size as well. The comparison of rockfish densities and sizes in marine reserves to fished areas in Puget Sound shows that removals by fishing activities affect the abundance and size structure of rockfish populations (Palsson *et al.* 2009). We conclude that the decline in abundance and size observed for several species of rockfish is primarily due to the effects of past fishing.

Age truncation, the removal of older fish, can occur at even moderate levels of fishing for rockfish (Berkeley *et al.* 2004b). For long-lived fish such as rockfish, age truncation can have "catastrophic" effects (Longhurst 2002). A study of black rockfish revealed that age truncation occurs along the central coast of Oregon, and that older fish release their young earlier in the spring than younger fish (Bobko and Berkeley 2004). Further, older fish produce better quality embryos with larger oil globules and have higher absolute fecundities (Berkeley *et al.* 2004a, Bobko and Berkeley 2004). These and other results led Berkeley *et al.* (2004a) to conclude that older rockfish produce high quality larvae which are better able to withstand starvation and grow faster than the offspring of younger fish.

Age truncation as a result of fishing may affect rockfish populations in Puget Sound by reducing the number of larvae produced, the fitness of the larvae produced, and the period during which larvae are produced. All three of these factors may act to diminish the chances of successful recruitment in Puget Sound.

Rockfish often experience severe injury and death (e.g., "barotrauma") when brought to the surface from depth. Recent studies have revealed the potential for high mortality of fish caught at depth and subsequently released, and studies have shown mixed results in ameliorating the effects of barotrauma injuries. Techniques aimed at minimizing barotrauma have focused on reeling fish up slowly, venting or deflating the swim bladder and rapid re-submergence.

- **Speed of retrieval**-The speed of reeling and the ascent rate does not lessen the effects of barotrauma on rockfish. The low speed of reeling does not improve the survival of copper rockfish (Meyer 2006), and holding experiments of quillback rockfish brought to the surface slowly and those brought to the surface rapidly do not differ in their survival following four to six weeks in captivity (Berry 2001). Berry (2001) did find a higher incidence of eye damage by fast reeling with power reels in quillback rockfish.
- **Venting**-Venting (or "fizzing") involves puncturing the swim bladder to remove pressure on the organs by allowing the captured gas to escape (Berry 2001, Kerr 2001, Meyer 2006, Wilde 2009). The puncture is usually performed with a hypodermic needle or other sharp object along the side of the fish. In an analysis of 17 studies among 22 species or species groups, Wilde (2009) found little support that venting improves the survival of fish. Venting might be slightly beneficial to fish caught in shallow water, but is increasingly detrimental to fish captured in deeper water. Studies of quillback rockfish held in underwater cages

following capture found no difference in survival rates between vented fish and unvented fish (Berry 2001). A study in California found similar results for blue rockfish (Gotshall 1964). Autopsies of vented and unvented fish four to six weeks following capture, indicate that vented fish have a lesser rate of swim bladder lesions than unvented fish (Berry 2001). Following release, differences in behavior were noted between vented and unvented rockfish (Gotshall 1964).

- **Rapid submergence**- Reducing the time held at the surface or out of the water is more important in increasing survival than venting rockfish (Berry 2001, Parker *et al.* 2006, Hannah and Matteson 2007, Jarvis and Howe 2008). Parker *et al.* (2006) tested the effect of re-submerging captured black rockfish immediately after capture and found that after 21 days, rapidly submerged rockfish only suffer 3.3 % mortality. Hannah and Matteson (2007) found the success of recompression depends upon the species of rockfish, with blue rockfish showing more behavioral impairment than black, canary and yelloweye rockfish. For copper rockfish, the increasing depth of capture results in greater external signs of barotraumas, but artificial deflation and recompression offer potential benefits for minimizing the mortality of rockfish (Meyer 2006). Berry (2001) found quillback rockfish rapidly recompressed to a depth of 15 meters (50 feet) suffered less mortality and appeared more "normal" than fish slowly re-submerged to 15 meters (50 feet) during the course of two days.

The mortality rate of rockfish caught in depths greater than 20 meters (65 feet) is high. Consequently, the incidental catch and encounter of rockfish during fishing continues to be a substantial threat to rockfish populations in Puget Sound. There is some promise of rapid recompression limiting this mortality. We conclude that the bycatch component of fishery removals remains as a high impact stressor and that at present there are no reliable methods to reduce the mortality due to the effects of barotrauma.

2.7.2 Habitat Disruption

Habitat disruption and loss includes naturally and human caused activities that temporarily or permanently alter existing natural habitats. Habitat disruption results from filling, dumping dredge spoils, sedimentation, trawling, constructing beach bulkheads, installing pipelines and cables, sunken vessels, and constructing artificial habitats. The most vulnerable rockfish habitats are shallow-water vegetated areas and deeper rocky habitats.

Juvenile rockfish are highly associated with submerged and floating aquatic vegetation including eelgrass and kelp, while kelp is prevalent in the shallow portions of adult rockfish habitats. The disruption of submerged aquatic vegetation could pose a threat to the habitat quality of rockfish. Surveys conducted by the WDNR indicate that eelgrass abundance hasn't changed during recent years, but localized increases and decreases have occurred (Berry *et al.* 2003, Dowty *et al.* 2005, PSAT 2007). The amount of kelp beds along the Strait of Juan de Fuca varies greatly from year to year and some specific areas, such as near Protection Island, has shown long-term declines

(Berry *et al.* 2002). In other areas of Puget Sound, kelp beds are increasing, due in part, to kelp growing on manmade structures (Levings and Thom 1994).

One-third of the Puget Sound's shoreline has been modified by human activities such as bulkheading, filling, overwater structures, and boat ramps (Bailey *et al.* 1998). Shoreline structures that extend over or through the subtidal zone alter fish communities compared to shore zones consisting of sand, cobble, or shallow rip-rap (Toft *et al.* 2004).

Another potential threat to rockfish is habitat disruption resulting from the introduction of exotic aquatic vegetation into Puget Sound. *Sargassum muticum*, an exotic brown algae, was accidentally introduced into Puget Sound from oyster aquaculture activities and now is ubiquitous in the extreme nearshore, where rocks and cobbles are present (Britton-Simmons 2004). These are the same habitats that post-larval copper rockfish settle in, but whether *S. mutium* affects rockfish settlement is not known. In North Sound, settling juvenile copper rockfish transition to *S. mutium* as the first substrate-associated recruitment in areas with minimal kelp habitat (Buckley 1997).

Adults of many species are closely associated with rocky habitats. The amount of this habitat is naturally limited, especially in Southern Puget Sound. A WDFW study (Pacunski and Palsson 1998) estimated 207 square kilometers (51,150 acres) of rocky habitat exists in North Puget Sound and only 10 square kilometers (2,471 acres) occurs in South Puget Sound. This rocky habitat may be affected by the deployment of mobile fishing gear, cables and pipelines, construction of bridges, sewer lines, and other submerged structures, and burying by sediments from dredge spoils, dam removal, and natural subtidal slope failures.

In Puget Sound, some commercial bottom trawl activities have targeted rockfish living on rocky habitats. Around the world, mobile fishing gear reduces physical and biological structure on the seafloor, leaving long-lasting impacts (Auster 1998, Dorsey and Pederson 1998, Kaiser 1998). In Puget Sound, trawling is presently limited to the Strait of Georgia, the San Juan Islands, and the western Strait of Juan de Fuca. Roller gear, which can enhance the ability of trawls to fish on rocky habitats, is prohibited in Puget Sound. The extent of habitat disruption by bottom trawling in Puget Sound is not clear, but it is thought to be minimal (Bargmann *et al.* 1985).

The likely impact of large scale habitat disruption for rockfish in Puget Sound is low at present. However, localized habitat degradation may be impacting rockfish stocks.

2.7.3 Derelict Fishing Gear

Abandoned or lost fishing gear, especially gillnets, used for fishing for salmon and marine species is a threat to rockfish. Lost nets used for salmon fishing or trawling are distributed throughout Puget Sound. These nets have either become entangled on rocky habitats or obstructions or cut loose to sink to the seafloor. Up to 61,000 rockfish may be caught in this derelict fishing gear per year (Palsson *et al.* 2009), a magnitude of mortality greater than, or comparable to, recent annual recreational harvests and

bycatch of rockfish in Puget Sound. Based upon the documented extent of derelict gear on rockfish mortality, food webs, and habitats, there is a high risk to rockfish populations by derelict fishing gear in Puget Sound.

2.7.4 Climate Change

The survival and recruitment of marine fish, including rockfish, may be affected by climate-related oceanic conditions. The oceanography of Puget Sound and adjacent coastal waters are interlinked and affected by patterns that operate on seasonal, annual, decadal, and intermittent scales. Already, an increase in sea surface temperature of 1.7° Centigrade has been detected at Race Rocks (near Victoria, British Columbia) since the early 1970s (Mantua *et al.* 2007). Potential climatic patterns that affect biological processes include upwelling (Hsieh *et al.* 1995), changes in water currents, upwelling and temperatures such as the Pacific Decadal Oscillations (Ebbesmeyer *et al.* 1991, Hare and Mantua 2000), El Niño or Southern Oscillation events (Pearcy and Schoener 1987, Newton 1995), droughts (Newton *et al.* 2003), and climate change (Mantua *et al.* 2007). If waters become warmer due to climate change, one logical expectation is that species from warmer southern waters may invade Puget Sound while cold-tolerant species may become less common due to differential recruitment and mortality, advection of recruits, or even direct movement of adults (Mantua *et al.* 2007).

How climatic changes directly affect rockfish in Puget Sound is unclear, but biological effects of climate change can affect the year-to-year success of reproduction for rockfish, other bottomfish, and salmonids. For example, successful year classes for different rockfish appear to be linked to warm, intermediate, and cold oceanographic conditions (Hollowed *et al.* 1987, Hollowed and Wooster 1995). Moser *et al.* (2000) found that juvenile rockfish abundance of several species was negatively correlated with warm water and El Niño events in the California current system. Major perturbations have been observed with many extreme El Niños affecting the Northeastern Pacific (Pearcy and Schoener 1987). A common pattern of rockfish recruitment, observed along the West Coast, is infrequent and irregular years of successful recruitment, with many years of poor recruitment (Parker *et al.* 2000). The synchronous recruitment event of 2006 in Puget Sound observed for copper and quillback rockfish in South Sound and black and yellowtail rockfish in North Sound (LeClair *et al.* 2007), suggests rockfish productivity is affected by sporadic recruitment events, which are likely related to broad-scale climatic events. Many rockfish species along the West Coast exhibit sporadic recruitment over many decades (Hollowed *et al.* 1987, Moser *et al.* 2000). Synchrony of rockfish recruitment in the California Current System appears to predominate on coast-wide rather than smaller regional scales, suggesting that large-scale climatic factors are affecting rockfish recruitment (Field and Ralston 2005). In contrast, different California regions can show different patterns in catch per unit effort for rockfish in response to El Niño conditions (Bennett *et al.* 2004). For example, as El Niño conditions developed or as ocean climate turned warm after 1977, catch rates for rockfish declined in southern California and increased in the north.

Unfortunately, knowledge of recruitment patterns is lacking for any species of rockfish in Puget Sound, so the impact or potential impacts of climatic change on recruitment cannot be directly addressed. Overall, how climate change affects rockfish in Puget Sound is unknown. A recent study of climate change by the University of Washington concluded that profound changes have occurred in the Puget Sound environment over the past century and that the next several decades will see even more changes (Snover *et al.* 2005). Projected changes that could impact rockfish include increases in water temperature, flooding, accelerated rates of sea level rise, loss of nearshore habitat, changes in plankton, and increased likelihood of algae blooms and low levels of dissolved oxygen. Each of these potential changes could adversely impact rockfish populations in Puget Sound, but at present the known impact on rockfish is low.

2.7.5 Water Quality

Throughout most of Puget Sound, the water quality (temperature, salinity, dissolved oxygen) is suitable for rockfish survival and growth. Most waters of Puget Sound are classified as "Excellent" by the Department of Ecology, with Hood Canal remaining a glaring exception. Other areas, including Budd Inlet, Discovery Bay, and Penn Cove, may have waters that limit fish populations, especially due to warm summer temperatures.

2.7.5.1 Water Quality- Hypoxia

In Hood Canal, persistent and increasing areas of low levels of dissolved oxygen (hypoxia) have been noted during the past decade (Newton *et al.* 1995, 2005, Warner *et al.* 2002). This exposure to low oxygen results in abnormal behavior by rockfish in Hood Canal. For instance, rockfish avoid waters with less than 2 mg/L of oxygen by moving to nearshore, shallow waters less than 9 meters (20 feet) in depth (Palsson *et al.* 2008). In some years, extreme hypoxia results in massive fish kills in Hood Canal (Palsson *et al.* 2008). In 2003, hypoxia resulted in a 26% direct mortality of the copper rockfish at the Sund Rock Conservation Area (Palsson *et al.* 2008). In addition to mortality, rockfish exposed to low levels of dissolved oxygen may experience decreased growth rates and decreased reproductive success.

Overall, the impact of hypoxia represents a moderate risk to rockfish at present, but the risk appears to be increasing. The impact of hypoxia on rockfish is greatest in Hood Canal.

2.7.5.2 Water Quality- Changes in Nutrients

Nutrients are chemical compounds needed by organisms for metabolism, growth, and other functions. Nutrients in Puget Sound come from rivers, streams, and the Pacific Ocean. Humans can add nutrients to the waters of Puget Sound through sources such as sewage, agricultural runoff, and storm water (Paulson *et al.* 2006). The nutrients are not utilized directly by rockfish, but could impact rockfish populations indirectly. The addition of relatively small amounts of nutrients could increase rockfish prey such as crustaceans, which feed on the organic material while the addition of larger amounts could reduce water quality by causing hypoxia. The addition of nutrients can stimulate the growth of algae during the summer months through a process called eutrophication.

The algae dies, sinks to the bottom and decomposes, a process that utilizes dissolved oxygen. Therefore, increased levels of nutrients may lead to lower levels of dissolved oxygen in places such as Hood Canal. Increased nutrients from septic systems may be exacerbating naturally-caused hypoxia in Hood Canal (Newton *et al.* 2007), and this human source, as well as natural sources of nitrogen, may be causing the hypoxia that adversely affects rockfish populations (Palsson *et al.* 2008).

There is a lack of long-term monitoring information for nutrients in Puget Sound. PSAT (2002) identifies several water bodies that are susceptible to eutrophication including portions of the Whidbey Basin, Sinclair Inlet, southern Hood Canal, and portions of southern Puget Sound. In addition, several freshwater sources have high concentrations of total nitrogen and phosphorus including Skagit Bay, the Puyallup River, and the Deschutes River in Olympia. This risk is judged to be low.

2.7.5.3 Water Quality- Chemical Contamination

Risks to rockfish health associated with their exposure to toxic contaminants can occur at all life history stages where the pollutants occur. Demersal adults and juveniles, and pelagic larvae and juveniles can all be exposed to a wide range of toxic contaminants in their habitat. Larvae, in particular, face unique additional risks associated with maternal transfer of toxics via the nutrients they receive during gestation.

Many rockfish are long-lived and exhibit relatively strong site fidelity and high trophic position as adults. These factors increase the risk of exposure to persistent bioaccumulative toxics (PBTs) for populations that reside in contaminated habitats. Demersal rockfishes in urban or industrialized areas have exhibited some of the highest tissue concentrations of mercury, PCBs, and DDTs of any species monitored in Puget Sound (West *et al.* 2002). On a larger spatial scale, rockfishes residing in Central and Southern Puget Sound may experience greater exposure than populations in other Puget Sound Basins because Pacific herring, an important rockfish prey, exhibit unusually high levels of PBTs (West and O'Neill 2008).

PBT exposure may affect rockfish growth in Puget Sound. Male quillback rockfish exhibit a lower growth rate than females in Elliott Bay, a pattern that is unique to that urban location, compared to samples from 98 other locations in Central Puget Sound, Admiralty Inlet, Georgia Basin, and the Strait of Juan de Fuca (West *et a*l. submitted). This unique sex-specific disparity in growth pattern correlates with higher levels of toxics that accumulate in male rockfish in Elliott Bay (females can "depurate" their PBTs to their developing embryos).

Impairment of rockfish reproduction may occur when PBTs are maternally transferred to developing embryos. Rockfish larvae from urban females are probably born with a pre-existing body burden of PCBs, thereby increasing the risk that fitness of this sensitive life stage is compromised. In addition, English sole (*Parophrys vetulus*) studies suggest that exposure to certain pollutants may cause feminization of males and unusual spawn timing in females (Johnson *et al.* 2008) of benthic species living in contaminated habitats.

The contribution of rockfish living in urban, contaminated areas to the full reproductive output of all Puget Sound populations is unknown and needs to be quantified. For some rockfish species, the oldest individuals are typically found in urbanized habitats. Such areas may act as *de facto* refuges, because it is either difficult to fish the habitats (e.g., habitats near ferry lanes) or access is restricted to fishers (i.e., at military bases like Sinclair Inlet's Puget Sound Naval Shipyard). The greatest pollutant-related risks to the conservation and recovery of rockfish in Puget Sound relate to reproductive dysfunction of rockfish populations due to exposure to contaminants. At present, this risk is judged to be moderate due to its localized impacts.

2.7.6 Species Interactions

Rockfish have naturally evolved to persist and thrive in the presence of other species in Puget Sound. However, the perturbations in community structure caused by fishing, habitat alteration, and other stressors may negatively affect or create an imbalance in the natural structure of marine communities. This impact has not been demonstrated in Puget Sound and the risk is judged to be low.

2.7.7 Food Web Dynamics

Rockfish function as both predators and prey in the complex food web of Puget Sound. Some of these linkages have been examined through diet studies, and only recently are food web interactions for rockfish and other species in Puget Sound (PSP 2008) being integrated into a conceptual and quantitative model of food web structure. Simenstad *et al.* (1979) identified copper rockfish as an important carnivore of rocky, subtidal habitats in northern Puget Sound.

Harbor seals are year-round residents of Puget Sound, whose population has expanded greatly since the 1970s, increasing from a few hundred to over 12,000 in 1999 (Schmitt *et al.* 1995, Jefferies *et al.* 2003) and 14,000 recently (PSAT 2007). There are indications that the growth rate of the seal population is decreasing, and that the population may be reaching its maximum carrying capacity in Puget Sound (Jefferies *et al.* 2003). The average weight of harbor seals in Puget Sound is approximately 63 kg (140 pounds) and daily food consumption rates are approximately 4 % of body weight (Schmitt *et al.* 1995). Based on these numbers, the estimated consumption of food by harbor seals in Puget Sound is quite high, 2.2 million kg (over 5 million pounds) annually. In the San Juan Islands, where there are approximately 7,000 seals, rockfish comprise 12% of seal diets annually and 23% during the winter (Lance and Jeffries 2007). Lance and Jefferies (2007) concluded that the consumption patterns of seals may have an important impact on reduced stocks of rockfish.

Like harbor seals, California sea lions have not been common until recently in Puget Sound. (PSAT 2007). The first large aggregation was observed in 1979. Since then, the abundance of California sea lions has been in the hundreds and occasionally over 1,000 animals (Schmitt *et al.* 1995). California sea lions are seasonal migrants in Puget Sound, occurring primarily from September through June. The average weight per animal is between 180 and 277 kg (450 to 700 pounds). Antonelis and Perez (1984)

estimated daily food consumption to be 5 to 10 percent of their body weight. Therefore, a 225 kg (500-pound) California sea lion would eat 11 to 23 kg (25 to 50 pounds) per day. In a review of predation by marine mammals in Puget Sound, no evidence was found of a significant consumption of rockfish by California sea lions (Schmitt *et al.* 1995). However, because California sea lions consume rockfish off California, the observed lack of rockfish in the diet of California sea lions in Puget Sound may reflect low rockfish abundance, or poor seasonal and geographic data on California sea lion diets. The great numbers of harbor seals and some aggregations of sea lions in Puget Sound may result in significant natural morality of depleted rockfish stocks.

Consumption of rockfish by orca whales in Puget Sound is thought to be a rare event and the impact is likely low, even at low levels of rockfish abundance (Palsson *et al.* 2009).

Steller sea lions inhabit Puget Sound, especially in the entrance waters at Tatoosh Island and in the San Juan Islands, where dozens are present during the spring (S. Jeffries, WDFW, personal communication). Steller sea lions have increased in abundance in the northern portion of the western United States; currently, 800 to 1,000 animals inhabit northern Puget Sound during the fall and winter months (PSAT 2007). The impact of these large mammals on rockfish is unknown. In the San Juan Islands, rockfish occurred in 8.3 % of Steller sea lion scats (Lance and Jeffries 2007).

Rockfish are an important prey for several species of marine birds. Juvenile rockfish can be especially important for birds feeding their young. There has been no known increase in populations of marine birds that would likely affect rockfish stocks, and several species of marine birds are in decline in Puget Sound (PSAT 2002).

Rockfish, especially juvenile rockfish, are important prey for lingcod and may even be their primary food (Matthews 1987, Beaudreau and Essington 2007). Abundances of lingcod was low in Puget Sound prior to the mid 1990s but has increased in recent years (PSAT 2007), suggesting that lingcod may have an increasing negative effect on rockfish abundance. In marine reserves, lingcod may cause a "tropic cascade" which changes the structure of the marine fish community (Salomon 2002, Salomon *et al.* 2002). The high densities of lingcod observed in the long-term marine reserves in Puget Sound may reduce the abundance of rockfish through predation upon adult and juvenile rockfish (Palsson *et al.* 2004). Rockfish were three times more likely to occur in the diets of lingcod captured from marine reserves in the San Juan Islands than from fished areas (Beaudreau and Essington 2007). Therefore, increased abundances of lingcod and management practices promoting lingcod conservation may impact the abundance and recovery of rockfish stocks in Puget Sound.

The likely importance of predation limiting rockfish stocks in Puget Sound is moderate.

2.7.8 Competition

Rockfish have been shown to have competitive interactions, or to partition their environment to avoid competition with other rockfish species (Larson 1980, Hallacher

and Roberts 1985). In Southern Puget Sound, the increase in brown rockfish may be a result of the removal of the larger copper and quillback rockfish by the fishery, allowing for brown rockfish to invade an open niche. The impacts of competition may also be exacerbated or caused by the availability of prey. The present known impact of competition on rockfish stocks is low.

2.7.9 Hatchery Practices

West (1997) suggested that a potential stress to rockfish in Puget Sound was predation of larval and juvenile rockfish by "delayed-release," hatchery-reared salmon. Delayed-release salmon are Chinook salmon and coho salmon which have been held longer in hatcheries or net pens, so they are less likely to migrate to sea and more likely to remain in Puget Sound. Since Chinook and coho salmon consume rockfish, especially in the larval and juvenile stage (Buckley 1997), releases of larger hatchery salmon may impede the productivity of rockfish stocks in Puget Sound (West 1997). The number of delayed release salmon released into Puget Sound averaged 21.2 million fish annually from 1983 to 2001 and has declined by over 33% since. Hatchery releases of salmon into Puget Sound increased by a factor of four between 1972 and 1990 (Palsson *et al.* 2009). The number of hatchery-released salmon declined from a peak of 8.5 million in 1990 to 4 million salmon in 2005. Overall, there is a lack of information on the direct impacts of hatchery releases on rockfish stocks in Puget Sound and the risk is judged to be low.

2.7.10 Disease

Rockfish are susceptible to diseases and parasites (Love *et al.* 2002), but the effect on rockfish populations Puget Sound is not known. Extensive scale loss has occurred on individuals living in high densities or in poor water quality. Sub-adult quillback rockfish living on the Boeing Creek Artificial Reef had a disease causing scale loss attributed to a protozoan parasite (W. Palsson, WDFW, unpublished data). Copper rockfish concentrated in dense schools during events of low dissolved oxygen in Hood Canal had extensive scale loss (W. Palsson, WDFW, unpublished data). Conboy and Speare (2002) found the eggs of a nematode infesting rockfish in a British Columbia fish market, but the pathology to the fish was not known. A wide variety of parasites and diseases affect rockfish (Love *et a*l. 2002) and stress, such as in Hood Canal during low dissolved oxygen events, may exacerbate the incidence and severity of naturally occurring diseases to the point of sub-lethal or lethal effects.

Overall, diseases are likely naturally occurring and pose a low risk impact to rockfish stocks in Puget Sound.

2.7.11Genetic Change

Fishing can alter the genetic characteristics of fish populations by lowering genetic diversity and by artificial selection (Kenchington 2003). Fishing can artificially select larger and typically faster growing individuals thus promoting the survival of individuals with slower growth rates (Biro and Post 2008). Overall population growth rates may decrease, and other effects such as smaller size at maturity, smaller size at age, and smaller maximum sizes can occur (Law 2000).

The impacts of genetic change are likely subtle and need at least 30 generations to be expressed for long-lived rockfish. Thus, it may require several hundred years to identify any genetic changes. However, genetic change may be exacerbated when population sizes are low or naturally limited. Demonstrated genetic threats are lacking, and the impacts of genetic change to rockfish stocks are low.

Chapter 3 Alternatives and Analysis

3.1 Overview

WAC 197-11-444 provides a comprehensive list of subjects that must be considered in ~~this~~ the analysis ~~with the caveat that the EIS must only study the elements that apply to~~ of this proposal and add elements not included at the time of drafting of WAC 197-11-444 but identified as related to this plan. The alternatives introduced in section 1.1.2 of this Programmatic DEIS for the Puget Sound Rockfish Conservation Plan have been examined in the context of WAC 197-11-144 and found not to have a likely significant adverse impact to the environment except for the following two elements:

1) Plants and Animals - Habitat for and numbers or diversity of species of plants, fish, or other wildlife, unique species and fish or wildlife migration routes. 2) Land and Shorelines Use – Recreation.

3.2 Analysis of Alternatives to the Suggested Policy

This section provides an analysis of reasonable alternatives to each of the eight major policy areas proposed in the PSRCP. The alternatives are evaluated on their potential impact on stocks of rockfish in Puget Sound. The concept of stock is important or evaluating the success of the plan.

By "stocks" we mean we mean a group of interacting fish of the same species which are treated together for management purposes. The Puget Sound Groundfish Management Plan (Palsson *et al.* 1998) recognizes two stocks of most rockfish species in Puget Sound; based on geographical distribution (Figure 1); a northern stock and a southern stock. For example there are two stocks of quillback rockfish in Puget Sound; a northern stock and a southern stock,

The PSRCP proposes two alternatives for management of rockfish stocks in Puget Sound. One, the all species approach, would evaluate the condition of the stocks of rockfish and the other approach, the key species approach, focuses conservation effort on only a few selected species

All species approach- This approach would creat management strategies for up to 54 stocks of fish as follows: 28 known species of rockfish in the Sound, which is divided into two regions (north and south). Two species of rockfish (China and blue) are found only in one region. Thus the total number of rockfish stocks in the Sound is 54 (28 species times 2 regions minus 2 species in only one region). When the plan mentions all rockfish, it refers to 54 stocks to be managed.

Key species approach-This approach concentrates rockfish management and restoration on a subset of species. Some species are, or were, very common and

provide valuable ecological functions as well as inclusion in commercial and recreational fisheries. We classify these species as **key species** (Table 9). A species may also be classified as a key species due to acute conservation concerns regarding its current level of abundance. The draft plan proposes that the following species be considered as key species in Puget Sound:

Table 9. Species Of Rockfish Proposed As Key Species In Puget Sound.

Place	Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date	October 29, 2009
Time	7:00 pm to 9:00 pm
Place	Commons Room University of Washington, Friday Harbor
Date	November 2, 2009
Time	12:00 to 2:00 pm
Place	Room 172 Natural Resources Building, 1111 Washington Street, Olympia
Date	November 4, 2009
Time	7:00 pm to 9:00 pm
Place	Raven Room Skookum Inc, 385 Benedict St, Port Townsend
Date	November 6, 2009
Time	4:00 to 6:00 pm

~~Species may be added or removed from this list as deemed necessary for resource~~ management. As proposed in the PSRCP, there are seven key species, all of which are found in both regions, meaning that the number of stocks of key rockfish is 14. All of these stocks have the potential to be caught by commercial or recreational fisheries. Adoption of the key species approach would provide benefits to other species of rockfish as well as the proposed key species encompass the full range of representative habitats.

3.2.1 Affected Environment

The affected environment for all of the policy options and alternatives includes all of Puget Sound east of the Sekiu River that is utilized by larval, juvenile and adult rockfish. The environment includes the water column, intertidal and subtidal substrate, aquatic vegetation and animals that feed on rockfish or provide food for rockfish. The human environment is included as well: fishing; habitat alteration, pollution and construction activities.

3.3 Alternatives

The PSRCP proposes eight areas of policy action to achieve the goals. As described in Chapter 1 of this document, we developed a range of four alternatives for each of the action areas. These alternatives are described in Table 3.

3.3.1 Natural Production

The goal of the PSRCP to restore and maintain the abundance, diversity, and productivity of rockfish implies that stocks of wild rockfish will be maintained or restored to a healthy condition. By wild, we mean naturally produced rockfish regardless of parentage. By healthy, we mean rockfish stocks have sufficient abundance, productivity age, and spatial diversity to maintain populations through environmental fluctuations, climate change, and prolonged periods of low reproductive success. Another goal is to provide an increased number of larger, older rockfish in Puget Sound. Since many stocks of rockfish are at low levels of abundance with a scarcity of larger fish, realizing these goals will translate into higher numbers of rockfish with an increase in larger fish.

There are several potential environmental impacts if these goals are achieved. Increased numbers of rockfish and more, larger fish will mean increased demand and competition with other predators for forage. This increased demand could result in increased natural mortality rates for herring, shrimp, and other food items. Conversely increased populations of rockfish, especially younger, smaller individuals will act to increase the forage base of Puget Sound, because many other species, including birds and marine mammals, feed on rockfish.

While the goals of using natural production will act to increase the number of rockfish present in Puget Sound, we do not plan to utilize natural production to create unnaturally high populations of rockfish. Thus the environmental impact is predicted to remain at, or less than, historical levels of rockfish abundance.

Alternative 1 (Most Conservative):
All fishery and ecosystem management protects and recovers all rockfish species to healthy levels.

All rockfish species will be managed in an ecosystem context that considers the natural capacity of a population to sustain itself in relation to food web dynamics, targeted and bycatch fishery removals, other human induced stressors and limiting factors, and climatic factors. Stocks will be managed to assure intact genetic structure, sustainable production, age diversity and ecosystem services. The management of other marine species will consider fishery, habitat, population, and other impacts on the integrity and sustainability of natural rockfish populations.

Alternative 2 (Conservative): Preferred Option
Rockfish management shall place a high priority on the protection of key rockfish species and stocks to maintain and restore stocks to healthy levels using the natural capacity of the population to sustain itself.

All fishery and ecosystem management protects and recovers key rockfish species to healthy levels and considers the management and ecosystem impacts of other marine species.

This alternative has a narrower scope than Alternative 1 in that it limits activities to key species of rockfish rather than all species. Only key species will be managed in an ecosystem context that considers the natural capacity of a population to sustain itself in relation to food web dynamics, targeted and bycatch fishery removals, other human-induced stressors and limiting factors, and climatic factors. Stocks will be managed to assure intact genetic structure, sustainable production, age diversity, and ecosystem services. The management of other marine species will consider fishery, habitat, population, and other impacts on the integrity and sustainability of natural rockfish populations of key species.

Alternative 3 (No Action):
Rockfish will be generally managed under the terms of the Puget Sound Groundfish Management Plan (Palsson *et al.* 1998). This plan contains a policy of no net loss of habitat.

Natural production of rockfish will be considered as a complex of species, rather than individual species, attention to those species commonly harvested in recreational fisheries. (i.e. copper, quillback, brown and black rockfish).

Alternative 4 (Least Conservative):
All rockfish will be managed passively, and rockfish will not be considered in the management plans of other species. Habitat and ecosystem needs of rockfish will not be considered. Individual species will not be monitored or specifically managed.

Alternative 4 does not meet the stated need of the PSRCP.

3.3.2 Habitat

The management intent of this proposal is to protect and restore habitat important to rockfish. Habitat could be protected by enforcing existing rules and creating new rules encouraging other agencies (state, federal, local and tribal) to do the same. Research and surveys could be conducted to identify and protect rockfish habitat. Restoration could be accomplished by physical projects to improve the functioning of existing but degraded habitat, or new habitat which mimics natural habitat could be constructed. These projects could have a wide variety of approaches. Examples include removing derelict nets that are located on rocky reefs, improving water quality by removal of contaminants, minimizing habitat damage caused by fishing, restoring degraded vegetation beds, removing invasive species, and improving levels of dissolved oxygen.

As is the case with other options discussed in this document, the intent is to restore and maintain rockfish habitat to natural levels. This means that rockfish populations on protected and restored habitats will likely not exceed historical levels.

Protecting existing habitat means continued recreational opportunities for rockfish, both consumptive and non-consumptive. As degraded habitat is restored, recreational opportunities should increase as well.

Because this DEIS addresses a non-project activity, specific restoration proposals are not addressed. Any such proposal would be addressed separately as the details are developed, with reference to this plan and EIS as appropriate (WAC 197-11-442).

Under the hydraulic code (WAC 220-110); WDFW has the authority to regulate construction in marine waters of Puget Sound, including all rockfish habitat. The code, commonly referred as "HPA" (hydraulic project approval), is designed to protect fish life by regulating certain activities. While not designed specifically for rockfish, the code identifies three rockfish habitats of special concern (WAC 220-110-250):

Rockfish settlement and nursery areas
Eelgrass meadows Kelp beds

However, the HPA code does not emphasize rocky marine habitat, the habitat type most commonly associated with rockfish in Puget Sound.

Alternative 1 (Most Conservative): Preferred Option
Protect and restore all marine habitats types for all rockfish species.

This alternative provides the maximum habitat protection to all fish and wildlife species. Restoring rockfish habitat will provide benefits to other animals because the restored and protected habitat will improve their habitats as well. Of all the alternatives, this one places greatest emphasis on restoration. Activities under this alternative include 1) increased regulatory authority, 2) partnerships with other agencies which can influence rockfish habitat, and 3) active on-the-ground projects within the authority of WDFW to restore habitat.

Alternative 2 (Conservative):
Protect and restore rocky habitats for key rockfish species.

The intent of this alternative is to protect and restore rock habitats for key rockfish spaces. It differs from Alternative 1 by limiting efforts to habitats of key species and to rocky habitats only. This alternative would fully implement and enforce current authorities, and increase participation in effective external conservation processes and encourage other agencies to follow suit. ,

Alternative 3 (No Action):
Primarily rely on the HPA process to protect priority rockfish habitats and conduct opportunistic activities to protect rockfish habitats.

This alternative would seek to protect habitat through the current HPA process, and maintain involvement in state and federal protection and restoration processes. Compared to Alternatives 1 and 2, this option places more emphasis on protecting existing habitat. Restoration may occur but at a lower priority and scope. Instead, emphasis will be placed on protecting existing habitat through the regulatory process.

The impacts on fish and wildlife will be to maintain current levels or show slight improvement.

Existing HPA authority would be utilized to evaluate proposed construction projects for their impact on rockfish. Existing staff would continue to evaluate habitat requirements for rockfish and suggest modifications to the HPA code as needed to provide additional protection.

The existing Puget Sound Groundfish Management Plan (Palsson *et al.* 1998) emphasizes a policy of no net loss of rockfish habitat. Therefore actions under this alternative would focus on maintaining existing habitat, not on restoring or increasing the amount of habitat.

Alternative 4 (Least Conservative):
Rely on the HPA process to protect rockfish habitats. No research will be conducted.

Existing HPA authority would be utilized to evaluate proposed construction projects for their impact on rockfish.

3.3.3 Fishery Management
Past harvesting of rockfish has been the largest single threat to most species of rockfish in Puget Sound. Harvest levels have decreased in recent years but fishing remains a risk to rockfish. Establishing proper harvest controls will greatly strengthen conservation and restoration efforts. Rockfish fishery management is complicated because of the widespread distribution of most rockfish species in Puget Sound, the high rates of mortality of released fish, the co-occurrence of many species, the limited ability of anglers to distinguish one species from another, and the large number of fishing gears which can unintentionally capture and kill rockfish.

Alternative 1 (Most Conservative): Preferred Option
All fisheries in Puget Sound will be managed to ensure the health and productivity of all rockfish populations.

This alternative will provide the greatest benefit to rockfish, because all stocks of rockfish will be considered in management decisions. All fisheries will be analyzed for their potential impact on rockfish stocks. Fishing opportunities for species other than rockfish (i.e., salmon, lingcod and halibut) may be limited or modified to reduce or eliminate their impact on rockfish. For example, lingcod fishing may be prohibited or restricted in areas or depths with high potential to encounter yelloweye or silvergray rockfish. Because this alternative includes consideration of rare species, fisheries management may not be able to protect, detect and otherwise account for these rare species.

The initial impact on recreational fishing and recreation could be negative and substantial. Substantial numbers of rockfish are caught in fisheries for other species. Some of these species are in need of stock rebuilding and the fisheries may be

constrained to keep meet rebuilding needs. These constraints could include reducing fishing seasons, restricting fishing areas, and changing allowable fishing gear (i.e., minimum hook sizes for angling).

Alternative 2 (Conservative): All fisheries in Puget Sound marine waters will be managed to ensure the health and productivity of key rockfish populations.

This alternative differs from the first alternative in that only key stocks of rockfish will be considered in management decisions. When fisheries are examined for their potential impact on rockfish, the analysis will consider only the key species. In comparison to the example given in the first alternative, lingcod fishing will be examined for potential bycatch of yelloweye rockfish but not silvergray because the latter is not a key species.

This alternative will provide less protection to rockfish in that only key species will be considered, but it will have a reduced negative impact on recreational fishing for the same reason. This alternative will have a positive impact on rockfish populations, but less than the first alternative. The initial impact on recreational angling will likely be negative as fishing opportunities are constrained. However, the long-term impact on recreational activity could be positive compared to the third and fourth alternatives.

Alternative 3 (No Action):
Some bottomfish fisheries will be managed to ensure the health and productivity of some rockfish populations.

Fisheries for bottomfish will be examined for their impact on rockfish populations and conservation. For example, recreational fishing for salmon will not be modified to help meet rockfish conservation goals. The positive impact on rockfish will be much less than the impact of the first two alternatives. The initial impact on recreational fishing will be minor but could be substantially major and negative in the future, if rockfish populations do not respond favorably to the PSCRP.

Alternative 4 (Least Conservative):
Fisheries in marine waters will be passively managed with respect to the status of rockfish populations.

This alternative provides limited positive benefit to fish populations. Fishing seasons, areas, and gear specifications would be set without regard to conservation needs of rockfish. Instead, fishing would be allowed to continue uninterrupted. There is no benefit to rockfish under this alternative. While recreational fishing initially would be restricted, and may even see increased fishing opportunities, the long-term prediction is that the impact would be negative for the same reasons listed in Alternative 3.

This Alternative does not meet the stated needs of the PSRCP.

3.3.4 Ecosystem

Rockfish, as a group, occur throughout Puget Sound and provide a vital component of the food web in the Sound. Rockfish are major consumers of other fish and invertebrates and, in turn, provide food to a variety of other fish species, marine mammals and birds. Changes in rockfish abundance could have important effects throughout the food web in varied ways. For example, declines in abundance of juvenile rockfish could mean less food for other animals while decline in the abundance of larger rockfish could mean a lower rate of predation on other species.

Understanding the dynamics of food webs is difficult in Puget Sound (and in all other marine waters). This understanding requires detailed knowledge of food consumption patterns as well as understanding of biology and physiology of many types of organisms. At present, the Puget Sound Partnership and NOAA-Fisheries are developing an ecosystem model of portions of Puget Sound (Levin *et al.* 2009). At this time we conclude that insufficient information currently exists to manipulate rockfish populations in Puget Sound or the populations of other animals with the intent to restore ecosystem functions of rockfish. Efforts may be made to obtain additional information in this category, but would be conducted under the Research category (3.3.6).

The ecosystem functions of rockfish are largely unquanitifed. Since the functioning of healthy rockfish populations is largely undefined, it is not possible to chart a path to restore such functions or know when they have been restored.

Efforts to restore all rockfish populations to healthy levels provide the best way to achieve proper ecosystem functioning with Puget Sound. However, many other species in Puget Sound are not at healthy levels and restoration of rockfish species alone will not assure a healthy functioning ecosystem.

Alternative 1 (Most Conservative):
Protect and restore the functions of all rockfish in the complex marine ecosystem and food web in Puget Sound.

This alternative would seek to maintain or restore food web dynamics (e.g., predator- prey relationships). This may involve increasing or decreasing rockfish populations in attempts to meet forage requirements of other animals or to reduce predation. At this point, insufficient knowledge exists to accomplish these goals and there is a danger of unintended consequences of such effort.

Alternative 2 (Conservative):
Protect existing functions of key rockfish and conduct opportunistic activities to restore the functions of key rockfish in the complex ecosystem and food web in Puget Sound.

This alternative would maintain functioning at present levels or increase the levels of function by increasing populations of rockfish.

Alternative 3 (No Action): Preferred Option

Conduct opportunistic activities to protect and restore the function of some rockfish in the complex ecosystem and food web in Puget Sound. Focus will be on determining the proper ecological functioning of rockfish.

A limited number of activities would be conducted, focusing on relationships to determine the proper ecological functioning of rockfish in Puget Sound. This option poses little risk of unintended negative consequences to the ecosystem of Puget Sound, but continues research activities. If these research activities are successful, ecosystem measures could be implemented.

Alternative 4 (Least Conservative):
The ecosystem functions of rockfishes are not considered in rockfish management.

Under this alternative there is no direct management of rockfish function in the complex marine ecosystem and food web in Puget Sound. No attempt to maintain or conserve functions would occur. No attempt to gain additional information would occur.

3.3.5 Monitoring, Evaluation, Adaptive Management

Monitoring, evaluation and adaptive management are the activities required to produce successful management and to judge the success of current management efforts. They are defined as follows:

- Monitoring — collecting data on rockfish catch, abundance, life history characteristics
- Evaluation — analyzing the data to make inferences on the health of rockfish stocks
- Adaptive management — making changes in management practices as the result of the monitoring and evaluation to judge the success of current management efforts.

All three activities are required to produce successful management and to judge the success of current management efforts.

Fishery-dependent monitoring means collecting information from various fisheries, both commercial and recreational. Information typically collected includes amount of rockfish caught, the amount of effort required to make that catch, location of catch, and biological data on the catch such as age, length and sex. The advantage is that information from fishery-dependent monitoring is relatively inexpensive to collect, and the techniques for evaluating the data are well established. However, fishery-dependent monitoring for rockfish may be inaccurate because of changing fishery and management patterns (Palsson *et al.* 2009).

Fishery-independent monitoring means systematic collection of rockfish data independent of commercial or recreational fishing activities by professionals or trained observers. These surveys generally consist of measuring the density of rockfish (number per unit of area) at selected locations. These surveys can be conducted by

divers, use of electronic equipment, or use of scientific sampling devices. Certain types of fishery-independent data can be relatively expensive to collect, thus limiting the number of surveys that can be conducted. Additionally, some types of fishery-independent monitoring involve mortality of fish collected during the monitoring. However, the results can be precise and free of potential bias.

Alternative 1 (Most Conservative):
All rockfish populations will be monitored emphasizing fishery-independent and fishery-dependent information.

Some populations of rockfish are small and have always been so. Monitoring of small rockfish populations will be difficult and expensive. Additionally the ability to scientifically detect changes in population size or diversity will be very limited. This alternative has the greatest benefit to rockfish and associated animals because population changes in any population will be rapidly detected and adaptive management utilized.

Alternative 2 (Conservative): Preferred Option
Key rockfish populations will be monitored emphasizing fishery-independent and fishery-dependent information.

As the key stocks are most commonly encountered in fisheries and fishing is judged to be the greatest threat to rockfish, limiting monitoring and evaluation to key stocks will likely increase the benefit to the key stocks at a lower cost than Alternative 1. However, risks to stocks other than key stocks will be increased.

Alternative 3 (No Action):
Key rockfish populations will be monitored using primarily fishery-dependent and some fishery-independent information.

Monitoring will be limited to fisheries important to recreational fisheries. Both fishery independent and fishery dependent monitoring will occur. Monitoring will be largely fishery-dependent means with some fishery- independent monitoring occurring. This technique will pose risk to all rockfish stocks and limit the ability of management agencies to respond to changes in population or diversity.

Alternative 4 (Least Conservative):
Key rockfish populations will be monitored only with fishery-dependent information.

This option poses the greatest risk to rockfish. Limiting monitoring to fishery dependent means will decrease the cost of monitoring but increase the risk to rockfish. Fishery-dependent monitoring is not sensitive to changes in rockfish populations and may mask declines in abundance of rockfish. The ability of management agencies to respond to changing rockfish population will be severely curtailed.

Alternative 4 does not meet the stated need of the PSRCP.

3.3.6 Research

Research consists of collecting data relating to rockfish fisheries and the rockfish resources within Puget Sound, analyzing the data, drawing conclusions, and publishing the results. Research may be conducted by WDFW staff acting alone or in collaboration with scientists from other state, federal, tribal governments, nongovernmental organizations or universities. As is the case with monitoring (3.3.5) there are two general categories of research: fishery-dependent and fishery-independent. However, research differs from monitoring by addressing problems and developing solutions. Monitoring serves to evaluate the success of the solutions.

Research can address a wide variety of topics such as determining the impact of climate change on rockfish, developing artificial production techniques, and developing methods to reduce mortality of released rockfish. Research proposed in this plan will be directed to problems of rebuilding rockfish and maintaining healthy populations and habitats.

Alternative 1 (Most Conservative):
Implement new and cooperative research to understand the diversity, biology and productivity of all rockfish as well as needs for recovery.

Both fishery-dependent and fishery-independent activities will be conducted. This option will provide the most benefit to fish and recreational opportunities. Changes in fish population or environmental quality will be rapidly detected and WDFW will have the ability to respond rapidly. This ability will help lessen the decline in abundance of selected species to minimize the changes of a rockfish stock falling into the vulnerable category and reducing the number of rockfish in the precautionary category as more information is collected.

This will foster the development of sustainable fishing opportunities more than any of the other alternatives.

Alternative 2 (Conservative): Preferred Option
Implement new cooperative research to understand the diversity, biology and productivity of key rockfish as well as needs for recovery.

This alternative will have less favorable impact to fish and wildlife and to recreation. Research efforts will focus on key species but none will be conducted on the other species of rockfish. This will increase the risk that other species will decline to vulnerable status resulting in reduced recreational fishing opportunity for rockfish and other species of fish.

This alternative will foster sustainable fisheries for key species of rockfish.

Alternative 3 (No Action):

Conduct rockfish research to examine growth, population structure and habitat requirements for selected rockfish populations.

Limited research, both fishery-dependent and fishery-independent, will be conducted on a few selected species and will focus on shallow-water rocky habitats for adults only. While providing some information, risk to fish will remain high as many species will be placed in the precautionary category due to lack of information. This could result in decreased or unsustainable fishing opportunities.

Alternative 4 (Least Conservative):
Conduct no research on rockfish; only use information in the existing literature or nearby studies to manage rockfish stocks.

Fishery-independent research only will be conducted, making it difficult to detect changes in abundance or habitat in a timely manner. Only when large changes in fish abundances have occurred or habitat deteriorated will the changes become evident.

3.3.7 Outreach and Education

The intent of this category of action is to educate Washington residents and others of the special management needs of rockfish in Puget Sound and the present need for strong conservation efforts. The most obvious target group for this education is those who engage in harvest activities in Puget Sound because their activities have a direct link to mortality of rockfish. However, even people who do not fish can contribute to rockfish recovery by altering their personal activities. The purpose of conducting an education effort to the non-fishing public is: 1) emphasize the detrimental impacts of human activity on rockfish; and 2) link their personal actions to the health of Puget Sound and rockfish recovery. Outreach efforts to the fishing public would be directed at collaboratively identifying solutions such as placement of Rockfish Recovery Areas and methods to reduce the mortality rate of released rockfish.

With all alternatives, the short-term impact on fish and wildlife and recreation would be indirect and minimal. We do not envision any education or outreach activities that would harm or kill fish and wildlife or impact recreation opportunities. Rather, the activities would be conducted via WDFW's web site, on printed materials, and speaking arrangements.

Alternative 1 (Most Conservative): Preferred Option
Conduct a comprehensive outreach and education program to inform Washington citizens of the value of rockfish populations in Puget Sound.

Efforts would target the entire population of Washington as well as non-residents who visit the state and fish in Puget Sound. Emphasis will be placed on rockfish biology and the connection between individual action and the health of Puget Sound and the impact of individual harvest practices.

Alternative 2 (Conservative):

Conduct a comprehensive outreach and education program to inform Washington fishers of the value of rockfish populations in Puget Sound.

Efforts would be limited to people who engage in harvest activities and also be limited to the impact of harvest practices on rockfish populations.

Alternative 3 (No Action):
Write occasional popular articles, work with the media, use the rule-making process, and give public presentations on the importance of rockfish populations.

Scientific and management staff would engage in education and outreach activities only as opportunities arise. Focus would be placed on people who fish in Puget Sound.

Alternative 4 (Least Conservative):
Rely on others to inform the citizens of Washington of the value of rockfish populations in Puget Sound.

No WDFW staff would be involved in outreach activities. Instead, we would rely on the efforts of other agencies (e.g., the Puget Sound Partnership), magazines, web sites and interested individuals and organizations. Focus would be on topics chosen by outside groups.

3.3.8 Enhancement (Artificial Habitat and Hatchery Production)
This set of alternatives relies heavily on technology to restore and maintain populations of rockfish in Puget Sound. The two techniques proposed in the PSRCP are hatchery production and creation of artificial habitat.

Hatchery production entails gathering females from the wild and allowing them to produce larvae within a hatchery environment. The young fish would be raised in the hatchery and then released into Puget Sound. Existing Commission Policy (C2611) limits the use of hatchery production of rockfish to research and the restoration of depleted populations. We do not plan to utilize hatchery culture of young rockfish exclusively to provide recreational fishing opportunities. We would utilize rockfish hatcheries only to restore populations to a healthy level. Once populations are restored, the hatchery production would end. Additionally research may be conducted to prepare culture techniques prior to their use. Collection of wild adult rockfish for culture may have a detrimental impact of rockfish populations. Some of the captured fish may die during capture or capacity. This impact is anticipated to be very minor.

An artificial habitat could be constructed to increase the amount of functioning rockfish habitat. Initial new artificial habitat will seek to mimic the functions of rocky substrate as rockfish habitat or vegetated areas and will be used to replace lost or degraded habitat. Under existing policy (C3003), any constructed rocky habitat would be closed to fishing for rockfish. Construction of artificial habitat will have impacts on fish and wildlife. Positive impacts include increasing the amount of rocky habitat that will benefit species such as lingcod and rockfish and some species of shellfish. The new artificial habitat will cover existing habitat and be detrimental to species utilizing the area. An example is bivalve clams inhabiting a soft bottom which is covered by rocks to provide rockfish habitat. While the new habitat may be beneficial to rockfish, it will be detrimental to the bivalves. The impacts of such construction are not included in the EIS as they are project related. These impacts would be evaluated when a construction project is proposed; the impacts are likely to vary for each project and will be considered on a

project-by-project basis and any such construction project will be evaluated individually for its environmental impact (WAC 197-11-442).

Construction of new habitat may have unintended consequences which should be evaluated. These consequences may include increasing predation by lingcod on salmon, and disrupting migration corridors.

The existing agency policy on artificial reef design and construction (POL-401) requires that the benefits of an artificial reef outweigh the potential impacts on the bottom habitat and other marine resources. Any artificial reef constructed under this plan will meet this standard.

As needed, artificial habitat will be constructed to enhance, or increase available habitat for rockfish populations. Initial emphasis will be on constructing rocky habitat. In the future, efforts may be conducted to increase the amount of vegetated areas in Puget Sound or to increase the amount of habitat needed by juvenile rockfish.

Alternative 1 (Most Conservative):
Develop plans to 1) utilize hatchery production to assist in recovery of depleted rockfish populations consistent with natural production goals and 2) enhance habitat for all species of rockfish through the use of artificial habitat.

Hatchery production for rockfish will be used to recover depleted populations and for research. Research will be conducted to develop techniques for the culture of rockfish. This research will include development of hatchery techniques to raise fish in a hatchery environment and include small scale release of cultured fish. The releases will be designed to investigate the survival and movements of released fish as well as their impact of naturally produced rockfish. If the research is successful, rockfish will be cultured and released to speed the recovery of selected stocks.

Alternative 2 (Conservative): Preferred Option
Develop plans to 1) utilize hatchery production to assist in recovery of depleted rockfish populations consistent with natural production goals and 2) enhance habitat for key species of rockfish through the use of artificial habitat.

Hatchery production for rockfish will be used to recover depleted populations of key species of rockfish and for research. Artificial reef habitats will be used to restore available habitat for key rockfish populations.

The hatchery component will be identical to that of Alternative 1. Construction of artificial reefs will be limited to benefit a small number of key species of rockfish. We anticipate that fewer, smaller artificial structures will be constructed compared to Alternative 1. Artificial habitats will be constructed only to replace lost or degraded natural rockfish habitats.

Alternative 3 (No Action):
Hatchery production for rockfish may be used to recover key depleted populations and for research. Artificial reef habitat will be considered on a case-by-case basis.

Research and releases will be limited to key species will be limited to key species.
Construction of rockfish habitat will be limited to rocky artificial reef habitat.
Enhancement activities will be considered on a case-by-case basis.

Alternative 4 (Least Conservative):
Artificial reef habitat will be implemented opportunistically with limited or no assessment.

Hatchery production for rockfish will be limited to research investigations. Artificial reef habitat will be created as opportunities arise with limited or no assessment.

Hatchery production will be much reduced compared with other options. Adult fish will still be captured and their progeny raised in a hatchery environment, but only a few will be released annually. No effort will be made to construct artificial reefs unless an unanticipated opportunity arises. It is likely that no artificial habitat will be constructed under this alternative.

Appendix 1. Draft Puget Sound Rockfish Conservation Plan

D R A F T
PUGET SOUND ROCKFISH CONSERVATION PLAN

Policies, strategies and actions

October, 2009 Including

Preferred Range of Actions

prepared by

WASHINGTON DEPARTMENT OF FISH AND WILDLIFE

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Assistant Director Fish Program: Jim Scott Deputy Assistant
Director Fish Program: Jo Wadsworth Fish Management
Division Manager: Craig Burley Intergovernmental Resource
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INTRODUCTION

Rockfish in Puget Sound are in trouble. Many, but not all of rockfish species have declined in abundance, some quite severely, over the past two decades. These declines have resulted in increased scientific, economic and social concerns about the status of the resource and the economic viability of fisheries for rockfish in Puget Sound. This concern has manifested itself in several forums. In 1999, a petition was presented to the federal government to list several species of rockfish in Puget Sound under the federal Endangered Species Act (ESA). A scientific conference held in the San Juan Islands in 2003 concluded that the outlook for rockfish was "grim" (Mills and Rawson, 2004). A special review by the American Fisheries Society found several special of rockfish to be "vulnerable" in Puget Sound. A review of marine life in Puget Sound concluded that demersal rockfish were in decline, largely as a result of overharvest (West 1997). Another review of marine fish concluded that marine fish in Puget Sound were among the most threatened stocks of fish in North America (Musick *et al.* 1998). In 2007, another petition was received by the federal government. This petition requested that five species of rockfish in Puget Sound receive protection under the ESA; in 2009 the Department of Commerce concluded that two of these species (canary and yelloweye rockfish) warranted protection as threatened and one species (bocaccio rockfish) warranted protection as endangered.

These declines have largely been caused by historical fishing practices, although several other stress factors play a part in their decline. Rockfish in urban areas are exposed to high levels of chemical contamination, which may be affecting their reproductive success. Poor water quality in Hood Canal has resulted in massive periodic kills of rockfish as well as other species. Lost or abandoned fishing nets trap and kill large numbers of rockfish. This Puget Sound Rockfish Conservation Plan (PSRCP) provides a plan for rebuilding rockfish populations and providing sustainable fisheries when appropriate.

This plan was prepared by the Washington Department of Fish and Wildlife (WDFW) in response to these declines and threats. The goal of the plan is to provide a pathway to protect existing stocks of rockfish, rebuild depleted stocks, and provide sustainable fishing and other economic and harvest benefits to our citizens. The WDFW recognizes the Puget Sound tribes also have conservation concerns associated with rockfish populations. These concerns will be addressed with appropriate management provision identified during the development of agreed to Puget Sound rockfish state-tribal comanagement plans.

WDFW has concluded that the adoption of this plan falls under the authority of the State Environmental Protection Act (SEPA). Accordingly, a draft Environmental Impact Statement (EIS) will be completed to accompany this plan. After undergoing a period of public review, the draft EIS and draft plan will be reviewed and revised as necessary and a final EIS and plan issued. After the completion of the final EIS and plan, the Department will consider formal adoption of the plan.

Once adopted, this plan will be used as the Department's basis for developing co-management plans with tribal governments, establishing priorities for funding and staff assignments and specific regulation changes.

Guiding Documents

The development of this plan was guided by:

1. State law defining the duties and powers of the Department of Fish and Wildlife (RCW 77) which can be found at:
http://apps.leg.wa.gov/rcw/default.aspx?Cite=77

2. Relevant polices adopted by the Fish and Wildlife Commission which include:

Puget Sound Groundfish Management (C3003);
http://wdfw.wa.gov/commission/policies/c3003.html

Marine Fish Culture (C-2611);
http://wdfw.wa.gov/commission/policies/c3611.html

Marine Protected Areas (C-3013;
http://wdfw.wa.gov/commission/policies/c3013.html

Artificial Reef Design and Construction (POL-401)
http://inside.dfw.wa.gov/documents/pols/old/fish/pol-401.htm

3. The Department's 2009-2015 Strategic Plan which is located at:

http://wdfw.wa.gov/about/strategic_plan/

4. Relevant rulings by the federal court regarding the role of tribal governments in resource management in Puget Sound which includes:

Amendment to Paragraph G of "Order to Implement Interim Plan" entered May 8, 2001 in United States v Washington, Sub proceeding No. 96-2.

Time Period of Plan:
Indefinite; once formally adopted, the plan will remain in existence until changed. Due to the long life spans of many species of rockfish recovery can be expected to require several decades. For example the stock rebuilding plan for canary rockfish in coastal waters is over fifty years (Methot 2005) and that for yelloweye rockfish is approximately ninety years (Tsou and Wallace 2006).

Geographic Area Covered By Plan: Puget Sound:
In this document, Puget Sound refers to the marine waters of Washington State east of the Sekiu River and south of the Canadian-United States border, including all waters south to Olympia and Hood Canal.

Definition of Rockfish

By rockfish, we mean any species of fish in Puget Sound belonging to the family Scorpaenidae and members of the Sebastes or Sebastolobus genera. At the time of writing this plan, 28 species of rockfish are known to occur in Puget Sound (Appendix 4). If additional species are found to occur in the Sound, they will be managed under the auspices of this plan.

Rockfish species can be grouped into several general categories, based on their life histories and habitat associations. Species in the **nearshore complex** live in close association with rocky habitats usually in water less than 40 meters (120 feet) in depth and, as adults, have high site fidelity. These species are commonly taken in hook and line fisheries in Puget Sound and include copper, quillback, and brown rockfish. A second category of rockfish is the **deepwater complex** which is composed of large, deep-bodied fish such as canary and yelloweye rockfish. As adults, these fish live in deeper water and are often associated with rocky habitats. A third category is the **pelagic complex,** which are the species that live higher in the water column and may move longer distances as adults. Species that fit this general description include the black, blue, yellowtail and widow rockfish.

While there are many species of rockfish found in the Sound, some are very rare and have apparently never been common (i.e., rougheye and silvergray). Others are found only in very restricted areas of the Sound (i.e., blue and China rockfish). Other species are, or were, very common and provide valuable ecological functions as well as inclusion in commercial and recreational fisheries. We classify these species as **key species** which deserve management focus. A species may be classified as a key species due to one or more of the following factors:

1. Is, or was, very common in Puget Sound,
2. Is or was important to recreational and/or commercial fisheries,
3. Provides important ecological functions,
4. Has been identified as at extreme low levels of abundance.

We propose that seven species of rockfish in Puget Sound be classified as a key species (Table 1).Through the co-management process with tribal governments, species may be added or removed from this list as needed for resource management.

Table 1. Key species of rockfish in Puget Sound.

Place	Mill Creek Office WDFW 16018 Mill Creek Blvd, Mill Creek
Date	October 29, 2009
Time	7:00 pm to 9:00 pm
Place	Commons Room University of Washington, Friday Harbor
Date	November 2, 2009
Time	12:00 to 2:00 pm
Place	Room 172 Natural Resources Building, 1111 Washington Street, Olympia
Date	November 4, 2009
Time	7:00 pm to 9:00 pm

Summary of Life History Factors Relating to Rockfish Management and Recovery

This management plan will be based on the following life history and biological characteristics of rockfish. These characteristics will limit management flexibility and focus management effort.

1. Rockfish, as a group, are very vulnerable to the effects of fishing. Once populations are at a low level, recovery requires a great deal of time. Fishing strategies must be very protective of rockfish and allow only very low levels of exploitation.
2. Mortality of rockfish which are caught and released is very high.
3. Management goals for rockfish should include more than maintaining a specified level of biomass. A successful management plan should consider the age and size composition of the fish as well.
4. Several species of rockfish are similar in appearance and can be caught at the same location. It is very difficult for recreational anglers and commercial fishers to distinguish one species from another, resulting in limited management flexibility to selectively harvest most species and a general lack of public ability to identify species.
5. Rockfish occupy similar habitat and depths as lingcod and halibut and are commonly taken as bycatch in these fisheries as well as in fisheries for salmon.
6. Annual reproductive success is very variable and marked by numerous years of poor recruitment and occasional years of high recruitment. Maintenance of many ages of rockfish in the population is important to buffer the impacts of a sustained period of poor recruitment.

Stock Status

Stock assessment is the analysis of biological and statistical data used to determine the changes in abundance of fish stocks and, if possible, to predict the future trends of abundance. This plan will assign rockfish stocks to one of the four following categories of stock status:

Healthy Stock Status: A healthy stock is one that is stable or increasing and at, or above, historic levels of abundance.

Precautionary Stock Status: Precautionary stocks are those that meet the Vulnerable Criteria but conservation and management measures are in place to halt further decline or promote rebuilding.

Vulnerable Stock Status: A vulnerable rockfish stock is one whose spawning potential has been greatly reduced, and there are no additional risk factors.

Depleted Stock Status: A depleted rockfish population has been reduced to levels far below the Vulnerable Criteria and the stock may have additional risk factors such as rarity, limited range, or specialized habitat requirements

GOALS AND POLICIES

This document is intended to provide a framework of policies, strategies, and actions that will lead to the achievement of the following goal:

> **The goal of the PSRCP is to restore and protect our natural heritage of Puget Sound rockfish populations. Increases in the abundance, distribution, diversity and productivity of rockfish will help restore the Puget Sound ecosystem, provide opportunities to view rockfish in the marine environment and, when, appropriate, provide sustainable fishing opportunities.**

This plan considers the following eight different, but interlocking, policy elements: Natural production Habitat Fishery management Ecosystem effects Evaluation, monitoring and adaptive management Research Outreach and Education Enhancement

To meet this goal, this plan will include a set of strategies that:

- Recognizes the multi-species nature of the rockfish harvest.
- Considers the high mortality rates of released rockfish.
- Reduces mortality of released rockfish.
- Acknowledges the public's difficulty in distinguishing one species of rockfish from another.
- Recognizes the lack of detailed information needed for more precise management.
- Increases our knowledge of rockfish population status.
- Implements methods to achieve goals in a cost effective manner...
- Fosters likely acceptance and support by the public.
- Provides opportunities for utilization consistent with conservation of the rockfish stocks.
- Develops co-management plans with tribes and forms partnerships with other organizations to further rockfish conservation.

POLICY CATEGORY: NATURAL PRODUCTION

OBJECTIVE: Rockfish management shall place a high priority on the protection of key rockfish species and stocks to maintain and restore stocks to healthy levels using the natural capacity of the population to sustain itself.

Natural production means producing rockfish that are born in the wild in Puget Sound from naturally occurring stocks. Their habitat may be natural, restored or artificially created.

Strategies

1 **Protect and rebuild the diversity of rockfish stocks.** Diversity includes providing a wide variety of age and size classes of rockfish.

2 **Identify and reduce stressors on rockfish populations**. Many and varied stressors affect rockfish population in the Puget Sound.

3 **Consider all life stages of rockfish when evaluating proposals to modify habitat or develop management and fishery plans for other species.** The habitat requirements and distribution of juvenile rockfish in Puget Sound are poorly known.

4 **Identify and modify limitations to the production of rockfish**. Focus on human caused degradation of rockfish habitats.

Actions

1 Develop a science-based system of rockfish recovery areas that incorporates habitat needs, is of sufficient size for rockfish movements and considers likely dispersal of rockfish from the MPA. .

2 Develop actions to ensure that rockfish populations contain a wide variety of age groups, emphasizing protection of older rockfish. This wide variety will provide a longer period of larvae dispersal, making populations more resilient to environmental changes.

3 Work with the Puget Sound Partnership and others to identify key stressors and methods to reduce their effect of each stressor.

4 Remove derelict fishing nets and seek to reduce the incidence of new derelict fishing nets.

POLICY CATEGORY: HABITAT PROTECTION AND RESTORATION

Objective: Protect and restore all marine habitat types for all rockfish species.

Strategies

1 **Provide technical expertise to other agencies and interested groups to promote identification and protection of rockfish habitat.** The authority to protect rockfish habitat is spread among many agencies such as the state Departments of Ecology, Natural Resources and Fish and Wildlife. Counties also maintain significant authority to protect rockfish habitat.

2 **Consider water quality as a habitat issue.** The quality of water in which rockfish live may vary greatly. While most of the Sound has high quality water, there are areas of degraded water quality. Protecting the existing high quality water and improving degraded water conditions are important facets of habitat protection and restoration.

3 **Increase access to information-**Much of the existing information on habitat requirements and threats to that habitat is not readily available to the public and other agencies. We will work to make this information more available to increase the level of protection to rockfish habitat.

4 **Enhance the effectiveness of the Hydraulic Project Approval (HPA) process.** WDFW and other agencies have authority to review and approve proposed construction projects through the HPA process. A review and possible changes of the current effectiveness of this process could increase protection to rockfish habitat.

Actions

1. Review and update information used by WDFW and others to evaluate applications for construction projects in Puget Sound.

2. Work with the Puget Sound Partnership to increase the awareness of habitat needs of rockfish in Puget Sound.

3. Remove derelict fishing nets and seek to reduce the incidence of new derelict fishing nets.

4. Develop a science-based system of rockfish recovery areas that incorporates habitat needs, is of sufficient size for rockfish movements and considers likely dispersal of rockfish from the MPA.

5. Increase the awareness of rockfish habitat needs in the Priority Habitat and Species program.

POLICY CATEGORY: FISHERY MANAGEMENT

OBJECTIVE: All fisheries in Puget Sound waters will be managed to ensure the health and productivity of all rockfish populations.

Strategies

1 **Focus commercial fishing gears towards species other than rockfish:** Reduce the incidental impact of commercial fishing gears to rockfish.

2 **Obtain complete accounting of encounters:** The Department will seek to monitor the number, species, and mortality rates of rockfish captured and released by commercial and recreational fisheries.

3 **Consider rockfish when designing fisheries for other species:** The Department will consider, and reduce if necessary, the impact on rockfish when designing fisheries for salmon, halibut, lingcod and other species.

4 **Reduce encounters of rockfish with fishing gear.** To reduce bycatch mortality, it is necessary to reduce the likelihood of a rockfish encountering fishing gear, whether by a hook, a spear, or a net.

Actions

1. In fisheries where rockfish are captured incidentally to the harvest of other species, implement regulations to reduce this impact by a combination of gear, depth, time and area restrictions.

2. Develop regulations to allow complete accounting of all rockfish encountered in state managed commercial fisheries. The department will work with tribal co-managers to develop this package.

3. Improve accounting of rockfish released in the recreational fisheries.

4. Minimize or eliminate the encounters of rockfish from the deep water complex.

5. Implement measures to reduce the unintentional encounter of rockfish by any gear.

6. Develop a package of regulations which reduce the encounter of rockfish with fishing gear, both commercial and recreational: The department will work with tribal co-managers to develop this package

7. Implement measures to reduce the mortality rates of rockfish which are released alive. This measure will be delayed until the methods are developed and verified.

8. Recreational fishing guidelines for healthy stocks shall provide harvest opportunities that strive to maintain healthy stock status. When establishing harvest plans, stock condition of other species in the complex will be considered.

9. Minimize the encounters of rockfish whose stocks are in less than healthy condition.

10.Work with appropriate tribal governments to produce co-management plans which specify conservation and harvest objectives.

11. Develop a science-based system of rockfish recovery areas.

POLICY CATEGORY: ECOSYSTEM

Objective: Conduct opportunistic activities to protect and restore the function of some rockfish in the complex ecosystem in Puget Sound. Focus will be on determining the proper ecological functioning of rockfish.

Strategies

1 **Develop a network of Marine Protected Areas (MPAs) which are sufficient in size and location to provide ecosystem functions within their boundaries similar to the function in an undisturbed area**. Consider the use of MPAs within a broad approach which is not focused on the needs of rockfish but rather the entire aquatic ecosystem.

2 **Ensure that the population structure of fished populations contains sufficient numbers of older, larger fish**. Older and larger rockfish can produce higher quality larvae than younger fish. Also, the presence of a large array of age classes provide a longer period when larval fish are available as prey.

3 **Consider the ecosystem needs of rockfish in the management of other species such as lingcod and herring**.

4 **Incorporate new information on the effects of climate change on rockfish**.

Actions

1. Partner with other agencies and academic institutions to improve existing food web models.

2. Develop a science-based system of marine protected areas. Develop a network of linked areas of good rockfish habitat where fishing is prohibited or greatly restricted. This will ensure that larger and older rockfish remain present, and we will have an opportunity to study interactions between species in an area where human effects are minimized.

3. Seek to minimize introductions of species which may negatively impact rockfish.

POLICY CATEGORY: MONITORING, EVALUATION AND ADAPTIVE MANAGEMENT

Objective: Key rockfish populations will be monitored, emphasizing fishery-independent and fishery-dependent information.

Strategies

1 **Identify existing information gaps.**

2 **Focus existing monitoring and evaluation programs to ensure they address high priority information needs.**

3 **Develop new programs or modify existing programs to address high priority information needs.**

4 **Form partnerships with other agencies, universities, tribes and others to expand and focus the research and monitoring activities.**

5 **Adopt flexible management and regulatory programs that will allow rapid change in response to new information or altered environmental conditions.**

6 **Rapidly incorporate new information on the effects of climate change on rockfish.**

Actions

1. Develop a science-based system of rockfish recovery areas. Develop a network of linked areas of good rockfish habitat where fishing is prohibited or greatly restricted to provide an opportunity to study effects of environmental change on rockfish separate from human removals.

2. Reach agreements with tribal governments that incorporate common management goals, monitoring techniques and an agreed-upon format to exchange information.

3. Utilize local groups of citizens to improve monitoring (i.e., the Citizen Science program, county based Marine Resource Committees, Dive organizations, environmental organizations, and fishing associations).

4. Form partnerships with the Canadian government and the province of British Columbia to provide mutual benefits regarding rockfish management and rebuilding.

5. 5. Develop a network of marine protected areas to help evaluate the effects of fishing, climate change and to monitor reproductive success.

POLICY CATEGORY: RESEARCH

OBJECTIVE: Implement new and cooperative research to understand the diversity, biology and productivity of key rockfish as well as needs for recovery.

Strategies

1 **Increase partnerships with academic institutions, tribes, and state and federal agencies.**

2 **Form a workgroup to identify high priority information needs.**

3 **Identify high priority baseline research activities that should be conducted consistently over time.**

4 **Develop new information on the effects of climate change on rockfish.**

Actions

1. Better identify habitat areas and requirements for adult rockfish.

2. Collect and analyze information on rockfish growth and reproductive rates.

3. Develop computer models to evaluate the potential effectiveness of rockfish recovery areas as well as the risks involved.

4. Determine the effects of contamination on reproductive success of rockfish.

5. Develop and verify methods to reduce the mortality rate of rockfish caught unintentionally.

6. Develop a program of utilization of non-fishing areas to investigate changes in rockfish populations independent of the effects of fishing.

7. Develop a program to learn the distribution abundance and habitat requirements for juvenile rockfish.

POLICY CATEGORY: OUTREACH AND EDUCATION

OBJECTIVE: Conduct a comprehensive outreach and education program to inform Washington citizens of the value of rockfish populations in Puget Sound.

Strategies

1. **Develop a public information and outreach effort to**:
   - Educate the public about the status of rockfish populations in Puget Sound, where the federal government has proposed listing three species for protection under the Endangered Species Act.
   - Inform anglers and the general public about WDFW's effort to conserve and restore Puget Sound rockfish.
   - Educate anglers about effective methods of reducing the incidental encounter of rockfish, as well as release techniques that increase the rate of survival.

Actions

1. Develop a webpage featuring the Puget Sound Rockfish Conservation Plan and the Department's effort to protect and restore rockfish in Puget Sound.

2. Issue news releases and post information on WDFW's website about opportunities for the public to comment on the conservation plan.

3. Work with the Anadromous and Marine Resources Sportfishing Advisory Groups to develop methods to reduce the incidental encounter of rockfish.

4. Work to enlist sportfishing advisory group members' assistance in expanding understanding of the conservation plan and implications for fisheries in Puget Sound, as well as methods to reduce the incidental encounter of rockfish and effective methods of releasing the fish to increase the rate of survival.

5. Include within the *Fishing in Washington* sportfishing rules pamphlet information on the importance of minimizing the incidental encounter of rockfish in Puget Sound.

6. Work with county Marine Resource Committees to increase citizen involvement in efforts to protect and restore rockfish in Puget Sound.

7. Coordinate communication efforts regarding rockfish with the Puget Sound Partnership, a coalition of citizens, governments, tribes, scientists and businesses working together to restore and protect Puget Sound.

8. Promote underwater viewing opportunities that rockfish populations provide in Puget Sound.

POLICY CATEGORY: ENHANCEMENT (Artificial Reef and Hatchery Production)

OBJECTIVE: Develop plans to:

1. Utilize hatchery production to assist in recovery of depleted rockfish populations consistent with natural production goals: and
2. Enhance habitat for key species of rockfish through the use of artificial habitat.

The intent of all enhancement techniques will be to assist in the conservation of rockfish resources in Puget Sound. The construction or use of enhancement techniques to provide or increase fishing opportunities will not be considered.

Both hatchery and artificial habitat activities will be conducted in accordance with existing agency policies.

Strategies

1 **Utilize the expertise of the National Marine Fisheries Service staff in western Washington to evaluate the potential of culture of individual species of rockfish.** These scientists are among the world experts in marine fish culture.

2 **Utilize technology to construct new habitat or modify existing habitat.** This new habitat would be used to mitigate for degraded or destroyed natural rockfish habitat and to increase the amount of habitat for rockfish.

3 **Seek to combine construction of new habitat with increasing opportunities for non-consumptive use of rockfish.** Attempt to combine efforts to increase habitat by focusing on areas suitable for divers as well.

Actions

1. Initiate action to culture depleted species focusing on yelloweye and canary rockfish.

2. Initiate research to evaluate the effectiveness of the release of cultured fish, including potential negative impacts on existing fish populations.

3. Review the permitting requirements to construct new habitats in Puget Sound.

4. Assemble an interagency group to develop site criteria for possible construction of new habitat.

5. Work with public groups to implement these activities and share the costs and work load.

Adaptive Management for the Puget Sound ~~Salmon Recovery~~ Rock Fish Conservation Plan

Purpose and Need

The Draft Puget Sound Rock Fish Conservation ~~Salmon Recovery~~ Plan represents an ~~unprecedented~~ effort to construct a recovery plan for ~~a culturally and commercially important~~ species of Rock Fish to be possibly listed under the Endangered Species Act across ~~a~~ the large body of water known as the Puget Sound located in a urban and urbanizing region. The geographic area is vast; the legal, biological, and political issues are complex and interdependent; the information is incomplete; and the recovery planning process is new in some places, and evolving.

Despite these challenges, the plan represents the beginning of a research building block fifty to one hundred year Puget Sound Rock Fish Conservation Plan. Working with local, National and International citizens and groups, this plan aspires to bring together innovative action ideas and astute evaluation of actions. ~~thousands of hours of technical and policy work by watershed and regional planning groups. As a result of these efforts, the~~ This plan is based on the best available scientific information about ~~salmon and their freshwater and~~ Rock Fish and their marine habitats within the Puget Sound and research related to rock fish. With this foundation, of a building block research strategy ~~strategies~~ and specific actions to recover ~~Chinook salmon have been~~ Rock Fish are being carefully crafted. ~~outlined.~~ Additionally, the plan reflects the different legal authorities and management organizations able to take actions to recover Rock Fish ~~salmon~~. The WDFW, Puget Sound watershed groups, Federal, Tribal, local and regional ~~salmon recovery~~ groups interested in Rock Fish Conservation can proceed with confidence based on the above characteristics. Adding to this confidence is the explicit recognition that the plan's key political and biological assumptions, which are unproven, can be tested as recovery moves forward. The plan calls for us to check assumptions, improve our knowledge, monitor our progress, and adjust our plans and our actions as we go. This will be accomplished through adaptive management.

Adaptive Management

Adaptive management is the process of making decisions, implementing them, learning from the results of implementation, and adjusting decisions as necessary. In so doing, the certainty of achieving society's goals improves.

Adaptive management provides the ability to:

Integrate science and policy in making decisions;

Use systematic processes for improving future management actions by learning from the outcomes of implemented actions;

Use rigorous, transparent processes to set and assess goals and timeframes;

Reduce uncertainty over time;

Increase accountability and reduce risk of insufficient investment and misdirection of funding;

Take action in the face of uncertainty;

Communicate information to the public in order to build understanding;

Learn from unexpected events and capitalize on "crisis;"

Distinguish mistakes from failures.

RECOVERY PLAN IMPLEMENTATION – ASSESS AND LEARN FROM THE RESULTS - ADAPT PRIORITIES AND ACTIONS AND MANAGE ACCORDINGLY

Adaptive Management and ~~Salmon Recovery~~ Rock Fish Conservation

Adaptive management for ~~salmon recovery~~ Rock Fish Conservation has many elements in common with the way adaptive management is applied in other natural resource management issues. For example, collection of environmental data in ~~salmon~~ Rock Fish habitats, research on habitat function, monitoring clean water and flows, access to analyses and data, allocation of sufficient resources, and many elements of decision making structures already exist. Adapting these to assess the goals and measures of success for achieving viable ~~salmon~~ Rock Fish populations and ESU recovery, however, is unique to ~~salmon~~ Rock Fish recovery. The key distinguishing factor of ~~salmon~~ Rock Fish recovery is that success is determined by the overall status of populations in the ESU, which is a reflection of the individual abundances, population growth rates and trends, diversity characteristics, and habitat distributions of the different ~~salmon~~ Rock Fish populations. The multifaceted recovery requirements for Rock Fish mean that adaptive management must be applied at multiple geographic levels. As a result, there are three obvious levels at which adaptive management must occur:

Identified bodies of water ~~Watersheds~~ and populations.
The recovery plan builds on information from two geologically distinct bodies of water, which when combined, are known as the Puget Sound to which ~~watershed~~ specific action plans to protect and recover specific populations within each body of water ~~watershed~~ and third, each ~~Each~~ body of water population has ~~separate~~ goals, separate assumptions, actions, and all expected results to aid in Rock Fish conservation.

The Evolutionarily Significant Unit (ESU).
The status of the ESU depends on the status of the individual populations across the Puget Sound as they relate to ESU recovery goals, the assumptions that those goals are based upon, actions, and expected results. In addition, certain recovery actions lend themselves to regional or ESU-wide solutions.

Multiple ESUs.
Some factors affecting ~~Chinook~~ Rock Fish populations occur or are managed at geographic scales larger than the Puget Sound. ~~Harvest management of Puget Sound Chinook salmon Rock Fish, for example, involves monitoring, analysis, and negotiations between different states and countries.~~ For example from the Straight of Juan de Fuca northward, the coastline of the State could be considered geologically Ocean coast while the southern half more of an esturary or bay type formation.

Key questions that an Adaptive Management Program must Address

The implementation and design of this recovery plan raises a number of key questions that must be addressed in order for the recovery plan to be successful at the population and ESU levels. Adapted management programs for all three levels listed above will need to address each of the following questions:

Figure 7.1 Adaptive Management: A framework for learning and adjusting during plan implementation.

1. *Who are the key decision makers with the authority to affect the implementation of recovery strategies and actions?* These are the groups to whom information should be provided (at the population or ESU scale), and whose decisions can be adjusted as necessary to adapt the plan over time.

2. *What are the ~~salmon~~* Rock Fish *goals the plan aims to achieve?* These goals at the population scale are expressed as Rock Fish ~~VSP~~ abundance, productivity, diversity and spatial structure targets or as objectives for the ecological functions and habitat conditions or processes an environment ~~a watershed~~ will provide. At the ESU scale, the plan aims to achieve a negligible risk of extinction of the ESU and sustainable harvest.

3. *What are the key hypotheses for which ~~salmon~~* Rock Fish *life stages and habitat, hatchery or harvest factors ("H" factors) are limiting recovery?*

4. *How are individual actions for each H factor and their cumulative effects addressing the key life stage(s) and H factors limiting recovery?* How are specific and combined effects of actions contributing to achieving changes in H factors? How in turn are changes in H factors contributing to achieving the goals? What measures best assess the overall effectiveness of the actions?

5. *How does data collection support the measures to assess effectiveness?*

6. *How does communication occur at all levels about the results of actions to improve knowledge?*

7. *Are there sufficient resources to carry out each element over the necessary time period and geographic area?*

8. *What is the organizational (decision-making) structure that defines roles and responsibilities for each element?*

9. *What are the commitments to implement the plan and its actions?*

A Strategic Focus

Because the list of questions that an adaptive management program must address is long, issues should be strategically prioritized and tracked. Examples of priorities are: the key life stages or H factors limiting recovery within the waters of Puget Sound identified in this plan, watersheds, actions that will have the most uncertain effects on key factors or life stages, or the

populations within the Puget Sound ESU whose improvements in status are critical to ESU recovery.

In addition to determining priorities, adaptive management must also be applied to the solutions that have been proposed to address "gaps" across ~~watersheds~~ the eight action areas. These gaps are key uncertainties in the plan that could not be addressed ~~by individual watersheds~~ during the planning period. Gaps occurred because 1) legal or policy issues affecting ~~salmon~~ Rock Fish recovery in a key population could not be resolved during this timeframe, but can be resolved over longer periods and 2) building the regional plan solely on simple solutions without considering the whole, ~~individual watershed recovery plans~~ would have ignored issues that need cross-action area ~~watershed~~ coordination to fully address Rock Fish Conservation. Because these gaps reflect important regional issues, the ultimate success of the plan depends on how well adaptive management will succeed in filling these gaps.

The "cross-action area ~~watershed~~" issues include:

The importance of habitat protection strategies and the need to assess the results for fish from ~~the~~ a combination of protection tools available,

The need to develop H-Integration strategies in a gestalt wholeness to address all marine concerns in Puget Sound or where they are included to move them further down the integration continuum over time,

The need to develop or complete a robust adaptive management and monitoring program,

The need to reconcile local nearshore strategies and actions with the regional nearshore strategies ~~chapter~~,

The need to address water resources, both water quality and water quantity,

The need to link the effects of land use to habitat-forming processes and to habitat conditions.

Gathering Information

Gathering and analyzing information on the success of various strategies and decisions is an essential component of adaptive management. Strategies and decisions affecting Rock Fish ~~salmon~~ recovery almost always involve the need to balance policy and scientific considerations — in other words, deciding what we want for fish and people given what is scientifically effective and politically tolerable.

WHAT IS BIOLOGICALLY POSSIBLE FOR RECOVERY – RECOVERY – RECOVERY WHAT SOCIETY WANTS FOR ITSELF AND FUTURE GENERATIONS Using a vin diagram, recovery is the result of a combination of the first and last statement.

This means that if adaptive management is to be applied to learn what works for Rock Fish ~~salmon~~ recovery, it must encompass two objectives: understanding what is biologically possible, and understanding how to implement strategies to recover Rock Fish ~~salmon~~ that are politically feasible. Understanding what is biologically possible for recovery requires improving scientific knowledge, such as assessments of habitat status, the key processes affecting habitat status, the biological response of Rock Fish ~~salmon~~ in different habitats, and the effects and efficiency of restoration efforts. Understanding what society wants for itself and future generations, given what

is biologically possible for recovery, means gathering better information on how to gain public support for habitat protection, restoration and rehabilitation.

Monitoring efforts for Rock Fish ~~salmon~~ recovery should correlate the scale and precision of monitoring with the purposes and uses of the information. ~~(2003 Washington Comprehensive Monitoring Strategy and Action Plan for Watershed Health and Salmon Recovery).~~ Monitoring for adaptive management and Rock Fish ~~salmon~~ recovery purposes will require a multitiered approach, addressing monitoring needs both within the respective two divisions of Puget Sound ~~watersheds~~ and across the ESU.

At all levels (watershed and population, ESU, multiple ESU's) for which information is collected and analyzed it generally needs to address four types of questions:

Implementation monitoring — Were the proposed actions implemented? If not, why not?

Effectiveness monitoring — are the recovery actions, such as regulatory programs or restoration projects, having the desired effect?

Validation monitoring — were our assumptions used in developing the recovery plan correct?

Trend/status monitoring — What are the status and trends of important indicators (i.e. habitat quality, habitat quantity, water quality, ~~VSP parameters, etc...) at a watershed level?~~

~~Watershed Level~~ Separate adaptive management for each section of Puget Sound studied

The Draft Puget Sound Rock Fish ~~Salmon Recovery~~ Conservation Plan is based largely upon ~~watershed~~ future building block research studies and general rock fish research. The two divisions of Puget Sound pose geologic differences, a coastal environment and a bay or estuary environment. These differences require that coordinated plans be developed to identify differences and similarities. ~~specific plans that have been developed over the past several years by local watershed groups. Each plan varies in terms of its content, scientific basis and background, level of certainty, analysis tools used to develop the plan, level of participation and commitment by watershed stakeholders, as well as other factors.~~

While many factors affecting Rock Fish ~~Chinook~~ are common across the Sound ~~watersheds~~ (habitat loss and degradation, harvest impacts, hatchery effects), there are many differences in how these factors have manifested themselves within each geologic environment ~~watershed~~ and how they interact with the particular fish populations in each environment ~~watershed~~. Thus, each watershed plan will have a slightly different set of specific questions and uncertainties to address through adaptive management yet coordinate to form a comprehensive plan of rock fish conservation.

FIGURE 7.2

Examples of general ~~watershed~~ level questions include:

What goals do we want to achieve within each plan ~~the watershed~~?

- Biological goals
- Habitat goals
- Policy goals
- Funding goals

What effects do we want to see from our actions and what effects do we actually see (effectiveness monitoring)?

- Restoration projects
- Protection actions
- Policy actions

What are the critical uncertainties in the ~~watershed~~ plan and how should they be filled or tested? Have we taken the actions we proposed in the plan (implementation monitoring)?

Are the effects occurring fast enough and are they significant enough to lead to recovery and accomplishment of goals (trend/resource monitoring)?

Were the assumptions used to develop the plan good ones (validation monitoring)? Were the right factors of decline identified and the right actions to address them?

What changes are needed to assure adequate progress to plan implementation and resource recovery?

~~Watershed level adaptive~~ Adaptive management must ask these questions in the context of specific fish populations, critical habitat types, conditions within that particular environment ~~watershed~~. The questions must be applied to each of the H's (hatchery, harvest, habitat and hydro).

In addition, there are H-Integration questions in each environment ~~watershed~~. These questions relate to understanding the interactions between harvest, hatcheries, and habitat in each environment ~~watershed~~ for each population. These are among the most important sets of questions to answer through adaptive management, both at the environment ~~watershed~~ and ESU levels. To date, scientific tools for understanding these interactions are relatively new and still being developed. Furthermore, the interactions are complex, resulting in high uncertainty of planned management actions to integrate the H-factors.

The environment ~~watershed~~ level adaptive management programs must have some common elements across environments ~~watershed~~ to allow "rolling up" information to the ESU level. Environment ~~watershed~~ level monitoring could include some common elements across environments ~~watersheds~~ to address ESU adaptive management questions.

ESU Level Adaptive Management

Many of the same basic questions asked at the environment ~~watershed~~ level also apply at the ESU level; however answering these questions requires information from both environments ~~all of the watersheds.~~

Example questions include:

What goals do we want to achieve at the ESU level?

- Biological goals (e.g., how many low-risk populations and how many are improving in status but not yet at low risk for EPA ~~all 4 VSP~~ parameters?)
- Habitat goals
- Policy goals
- Funding goals

What effects do we want to see from our actions and what effects do we actually see at the ESU level (effectiveness monitoring)?

- Restoration projects
- Protection actions
- Policy actions

What are the critical uncertainties in the ESU Plan and how do we fill them or test them?

Have we taken the actions we proposed in the plan (implementation monitoring)?

Are the effects occurring fast enough and are they significant enough to lead to recovery and accomplishment of goals (trend/resource monitoring)?

Were the assumptions we used to develop the plan good ones (validation monitoring)?

Did we identify the right recovery criteria (the number of fish needed for viability ~~and VSP~~)?

Did we identify the right Factors of Decline and the right actions to address them?

What changes are needed to assure adequate progress to plan implementation and resource recovery?

There are a number of "cross environment-~~watershed~~" issues that may be best addressed at the ESU level, including but not limited to:

Nearshore habitat protection and restoration — what is the role of nearshore habitats for multiple environments ~~watersheds~~ and stocks?

Instream flow protection (state program).

The effect of protection mechanisms on key fish populations ~~and VSP parameters~~.

Puget Sound water quality issues such as Hood Canal and South Puget Sound.

Integration of all the H's between environments ~~watersheds~~.

Beyond the ESU

There are a number of technical and policy issues that also must be addressed at a scale larger than either the environment ~~watersheds~~ or ESU level. For example:

Harvest management goals and actions are developed in the context of a complex management scheme that encompasses the entire West Coast of the United States and Canada. Adaptive management at this broad scale will need to be integrated into the management system for Puget Sound Rock Fish Conservation ~~Chinook recovery~~ efforts.

Treaty Trust Responsibilities involve a special relationship between the United States and Treaty Indian Tribes. This relationship cannot be comprehensively defined at the environment ~~watersheds~~ or ESU levels.

Many factors affecting the salmon are linked to statewide issues, such as water management, shoreline management, water quality protection, critical areas protection, and growth management that are largely defined by state law and actions.

As the adaptive management program is further developed and implemented, it will need to be synchronized with other management and monitoring programs in Puget Sound and that extend beyond the Puget Sound ESU.

Next Steps

During the first phase of implementation of the Draft Puget Sound Rock Fish Conservation ~~Salmon Recovery~~ Plan, it will be necessary for each environment ~~watersheds~~ to refine and give further definition to other local and State plans, watershed and regional adaptive management programs. In addition, a parallel regional approach will also need to be detailed.

During the first year of implementation, participants in the Puget Sound Recovery Plan will:

1. Convene watersheds to confirm, refine or develop an adaptive management program that allows them to make scientifically and politically defensible decisions that lead to Rock Fish ~~salmon~~ recovery in conjunction with other management plans in the watersheds.

2. Convene a regional group to identify regional adaptive management issues that cross plan jurisdictions ~~watersheds~~ and develop a plan. The regional group should involve representatives from each of the ~~watershed~~ plan responsible groups.

3. Watershed and regional groups will use ESU goals to identify metrics, performance standards for ESU roll up and the decision-making feedback to individual plan objectives ~~watersheds~~ or regional adaptive management processes.

4. The groups will conduct a gap analysis that identifies existing monitoring programs, provides habitat, population, or policy information and identifies where data collection or monitoring are not occurring.

5. The groups will secure commitments to prioritize key monitoring needs to fill existing gaps and implement those programs.

During ~~the~~ May 2005 review of watershed chapters and regional plan elements, the Technical Recovery Team and an interagency committee for salmon recovery identified a preliminary list of issues that have high uncertainty and needed to be incorporated into their adaptive management plan.

Technical issues identified and applied to Rock Fish include:

Interactions between ~~hatchery and wild fish~~ Rock Fish and other ground fish- in certain watersheds, estuaries, and Puget Sound. General interactions such as cannibalism, preditation, competition, interbreeding, straying, and disease transmission may or may not be ~~are~~ well known; however, the specific interactions in a particular watershed or habitat are less well documented in many cases. Improving our understanding of these interactions, quantitatively and qualitatively, is essential for "H integration" over time.

Juvenile ~~Chinook~~ Rock Fish use/survival in different ~~freshwater~~, estuarine and marine habitat types. While general habitat requirements and use by ~~Chinook~~ Rock Fish are known, the specific importance of specific habitats is not well understood. Increasing our knowledge of the use and survival of specific habitats is necessary to help validate models such as EDT that were used in some geologic environments ~~watersheds~~ and could be applied in other environments ~~watersheds~~ in the future.

Effects of freshwater and marine water quality on ~~VSP~~ Rock Fish parameters. The role of water quality on **Rock Fish** ~~Chinook~~ production and survival is poorly understood. Significant water quality problems exist in the region in both fresh and marine waters, however the

importance of these relative to **Rock Fish** ~~salmon~~ recovery needs further research and assessment.

Lack of a robust landscape based process model for determining land use effects on freshwater habitat and ~~VSP~~ Rock Fish parameters.

Photo courtesy the WAshington State Salmon Recovery Funding Board.
Fish biologists monitor salmon in the Stillaguamish River.

Future patterns of human population growth and development in the Puget Sound region could have profound effects on the survival and recovery of Rock Fish ~~Chinook~~ and other ground fish ~~salmonids~~. The impacts of this growth and development within watersheds and the region are not well monitored or assessed. This is a major source of uncertainty in the Recovery Plan and must be addressed in the detailed adaptive management plan.

H-Integration in each watershed and within Puget Sound. A variety of questions related to interactions among the 'H-factors" need to be addressed in the adaptive management program. Questions range from the need to understand how these interactions affect **Rock Fish and** VSP parameters over the long term to the effect of harvest on diversity and spatial structure. The adaptive management program needs to improve our quantitative understanding of these multi-plan interactions in order to adjust management over time.

Water quantity and instream flows. This is an important issue in every ~~salmon~~ watershed. Identifying instream flows, or flow regimes, that will support Rock Fish ~~salmon~~ recovery in each watershed represents a difficult technical challenge. There are numerous scientific tools to help identify these flows but there is significant scientific uncertainty of the efficacy of these tools. There is also a growing scientific consensus that we need to move away from identifying "minimum flows" and move towards identifying flow regimes that will support not only the biological needs of **Rock Fish** ~~salmon~~, but also support the habitat forming processes necessary to maintain habitat quality and quantity over time.

Nearshore protection. Scientists are recognizing the role and importance of nearshore marine habitats to **Rock Fish** ~~Chinook salmon~~ recovery. Because **Rock Fish** ~~salmon~~ are part of an ecologically complex web and different authorities and regulations affect these habitats, it is difficult to predict precisely the effects of different protection and restoration actions.

Effectiveness of regulatory habitat protection.
All watersheds identified provisions of the Shoreline Management Act and Growth Management Act as mechanisms for protecting habitat, but no watersheds proposed evaluating the implementation and effectiveness of these regulations, or other habitat protection measures, For **Rock Fish** ~~salmon~~. The adaptive management plan needs to identify a program for assessing the effectiveness of protection measures in each watershed and within the region.

The potential impacts of climate change on Rock Fish ~~salmon~~ recovery. Climate change, both natural and induced, could have significant effects on **Rock Fish,** Chinook salmon and other salmonids in the Puget Sound region and beyond. Possible effects include alteration of the hydrologic cycle resulting in changes in low and high flow patterns, changes to habitat forming processes, changes in terrestrial and riparian vegetation that affect habitat forming processes, changes in erosion patterns, and impacts to water quality. Significant research on this topic is being conducted in the region, however none of the watershed plans have proposed means of monitoring climate change or its impacts. This is a significant uncertainty in the Puget Sound Rock Fish Conservation ~~Recovery~~ Plan and should be addressed through the detailed watershed and regional adaptive management plan.

Nearshore. Uncertainties surrounding the habitat processes, conditions, population and ESU responses in the nearshore result in significant uncertainties regarding the effectiveness of the

entire ESU recovery plan. There needs to be an increased scientific understanding of the relationships between the viability of **Rock Fish** ~~salmon~~ and other ~~bull trout~~ ground fish populations, nearshore and marine habitat conditions, and habitat management actions. This might be measured over a research project ~~10 year~~ timeframe to develop and use quantitative models of the effects of habitat alterations on **Rock Fish** ~~salmon~~ population viability.

Policy issues that have been identified include:

Identification of key decision makers and responsible parties for implementing actions.

The need to describe the implementation process including anticipated research for ~~beyond~~ the first 10 years.

Implementation monitoring of habitat protection measures. There is currently no monitoring or evaluation system in place in the region for tracking the implementation and effectiveness of habitat protection measures for **Rock Fish** ~~salmon~~ recovery. It will be important to conduct an assessment to learn how effective various protection mechanisms are for achieving results for **Rock Fish** ~~fish~~.

Achieving instream flows within Puget Sound watersheds. There are significant policy and legal hurdles to achieving instream flows, once these are set or identified. A variety of approaches, from voluntary to regulatory, are being pursued in the region. The adaptive management program should track other agency ~~these~~ approaches ~~and inform changes to them~~ to achieve the goal of providing clean instream flow regimes that will support a **chemically free Puget Sound, to assist in Rock Fish** ~~salmon~~ recovery.

Identifying research needs in support of **Rock Fish** ~~salmon~~ recovery in Puget Sound

As exemplified in this plan, recovering **Rock Fish** ~~salmon~~ in Puget Sound will involve implementation of actions and a well designed adaptive management and monitoring program to track outcomes and make adjustments when needed. The proposed recovery strategies in habitat, hatchery and harvest management are based on our best understanding of the integrative effects of actions in each of these sectors. The process of designing recovery strategies has illuminated some key gaps in our scientific understanding of the Puget Sound that, if addressed, will greatly improve our ability to target recovery actions where their benefits will be greatest.

Key scientific uncertainties identified in the Puget Sound Rock Fish Conservation Plan ~~individual watershed plans~~ range from insufficient understanding of where juvenile **Rock Fish** ~~salmon~~ rear in ~~lower rivers~~, estuaries, and in the near shore to uncertainties in the cumulative effects of protection measures on habitat, and in turn, on **Rock Fish** ~~salmon~~. Similarly, important gaps in biological information at the regional scale include the relative importance of different nearshore habitats to specific ~~salmon~~ **Rock Fish** populations and how many ~~salmon~~ **Rock Fish** can be supported by nearshore and marine habitats.

The individual watershed, near shore and regional plans identified important gaps in our scientific knowledge~~, as illustrated in the previous paragraph~~. Prioritizing ~~these~~ research needs is a critical next step that is being initiated for the Puget Sound by members of the Puget Sound Rock Fish Conservation Plan Advisory Group, a group of scientists and policy-makers. A draft of a research needs document for ecosystem-based research and management in the identified Puget Sound environments of the plan, will be available for public comment at a later date to be determined after acceptance of this Puget Sound Rock Fish Conservation Plan. ~~later in the fall of 2005~~. Such a broadly agreed-upon research plan will help guide funding for research such that our scientific focus is strategically geared towards providing information that will improve the likelihood of

~~salmon~~ Rock Fish recovery and integrate Gestaltly with other marine concerns in the Puget Sound such as Anadromous fishes and Orcas.

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From: Jill Silver
To: Eturaspe, Teresa A (DFW);
Subject: Puget Sound Rockfish Conservation Plan
Date: Monday, January 04, 2010 4:46:28 PM

Dear Teresa:

Olympic Coast Alliance appreciates the opportunity to provide comments in support of developing a conservation plan to sustain rockfish in Puget Sound and the Strait of Juan de Fuca.

The purpose of the Olympic Coast Alliance (OCA) is to assure a healthy coastal ecosystem through public education and outreach, conservation issue advocacy, Olympic Coast National Marine Sanctuary support, stewardship programs, and a strong working relationship with coastal tribes. Our area of interest lies primarily on the outer coast and the western Strait of Juan de Fuca.

We are concerned that rockfish and other populations of fish are at risk of extirpation from overfishing, and strongly support the concept of Marine Protected Areas to provide protected nurseries and sustainable populations that will repopulate fishing areas outside. We support the All Species Approach alternative discussed in the Draft EIS.

Rockfish are a vital piece in a complex web of life. While we are sympathetic with those individuals, groups, and industries that rely on rockfish fishing for an income - we believe strongly that sustainable economies depend on healthy functioning ecosystems.

Thank you for considering these comments, and for proposing action that will support healthy and diverse fish populations into the future.

Sincerely,

Jill Silver
Secretary, Olympic Coast Alliance
www.olympiccoast.org

261

From: Ken Peggy
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Plan Comment
Date: Monday, January 04, 2010 2:54:32 PM

Sorry I am so late in writing and realize this is the last few hours you are accepting comments. As an avid fisherman I agree with proper conservation measures and support most of your recommended "preferred" options outlined in the plan.

Even though this plan applies to those areas east of the Sekiu River, I understand some of the WDFW commissioners propose closing of some key waters in marine area 4 from the first point west of Wadda Island, it starts with a K out pas Tatoosh Island to all fishing opportunities.

I strongly object to this proposal and feel the resource can be managed through more sound conservation and educational programs than the whole sale closure of the area. Some of the things already implemented is the 20 fathom rule, and education outreach of how to release a rockfish with an extended swim bladder.

If needed reduce the daily limit from the current of 10, implement a punch card, or other restrictive measures less extreme than flat out closure.

I have heard WDFW publishes notices and sends them out via e mail. If possible could you please add me to your e mail list?

Thank you.

The Nature Conservancy
Protecting nature. Preserving life.™

1917 First Ave.
Seattle, WA 98101

Tel (206) 343-4345
Fax (206) 343-5608

nature.org/
Washington

46 7

January 4, 2010

WDFW SEPA Desk
600 Capitol Way N.
Olympia, WA 98501-1091

Please accept the following comments for public record concerning the Draft Puget Sound Rockfish Conservation Plan (PSRCP). These comments relate to the eight policy categories and four alternatives in Table 3, pages 8 and 9.

1. *Natural Production*: We agree with your choice of Alternative 2, the key species approach. As the PSRCP states, rockfish species share similar habitats meaning management decisions for key species will undoubtedly benefit non-key species as well.

2. *Habitat*: Please consider Alternative 2. Habitat disruption is rated 'Low' under likely impact (table 8, p. 27). Again, by using the key species approach and focusing on the rocky habitats where older breeding females spend the majority of their lives, protection and restoration will have their greatest impact.

3. *Fishery Management*: We agree with your choice of Alternative 1. Here the key species approach would not work. Healthy and vulnerable stocks occupy the same habitats. The best solution listed in possible constraints (p. 44) is *restricted fishing areas.* We interpret this to be **science-based MPAs**, where **no fishing** is allowed.

4. *Ecosystem*: We agree with Alternative 3 as a good compromise. It would be hard to protect and restore the ecosystem function of either all or key species when the ecosystem functions are undefined and un-quantified (p. 45). Once the ecological functions of rockfish are better understood, protection and restoration of those functions could proceed.

5. *Monitoring, Evaluation and Adaptive Management*: We agree with Alternative 2. Risks to other than key stocks may be increased (p. 47) but only minimally if Alternative 1 is adopted under *Fishery Management*.

6. *Research*: We agree with Alternative 2 that would seem to go hand-in-hand with Alternative 3 under *Ecosystem* where the "focus will be on determining the proper ecological functioning of rockfish." (p. 9)

7. *Outreach and Education*: We would promote Alternative 2. While informing all the citizens of Washington about the value of rockfish would be great, what is really needed is buy in from the fishing community. If this could be accomplished, it would be a great springboard to educate all the citizens of Washington State utilizing fishermen as spokesmen.

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8. *Enhancement* (*Artificial Reef and Hatchery Production*): We prefer Alternative 3, **No Action**. While artificial reef areas such as Edmonds Underwater Park have large populations of lingcod and some rockfish species, the PSRCP states (p. 20) that transplant experiments putting rockfish from natural into artificial habitats results in the fish returning to the natural habitat. On page 19 it states "These structures… may not provide equal functions as natural habitats." There is no shortage of rockfish habitat, just a shortage of protected habitat. Science-based MPAs should be given a reasonable chance to succeed before artificial reefs are considered. Likewise, hatchery enhancement programs should not be considered until natural repopulation has failed. We agree with your *Natural Production*, Alternative 2 (WDFW's preferred choice), "… to maintain and restore stocks to healthy levels using the ***natural capacity of the population to sustain itself***" (emphasis added).

Under the GOALS AND POLICIES, the first six policy elements all mention the need for restricted fishing:

Natural production action step one is "Develop a science-based system of *rockfish recovery areas…*" Action step 2 is "Develop actions to ensure …emphasizing *protection of older rockfish.*" I take this to mean either MPAs or RRAs.

Habitat Protection and Restoration action step four is "Develop a science-based system of *rockfish recovery areas…*"

Fishery Management action step one states "…implement regulations … by a combination of … time and area restrictions." Action step 11 is "Develop a science-based system of *rockfish recovery areas.*"

Ecosystem action step 2 is "Develop a science-based system of *marine protected areas.*"

Monitoring, Evaluation and Adaptive Management action step 1 is "Develop a science-based system of *rockfish recovery areas.*" Action step 5 is "Develop a network of *marine protected areas…*"

Research action step 3 states "Develop computer models … effectiveness of *rockfish recovery areas.*" Action step 6 is "Develop a program of utilization of *non-fishing areas…*"

Outreach could easily have a similar action step educating the public about protected areas.

Enhancement would only be necessary when the one action step repeated above proves ineffective.

Restricted fishing in the form of MPAs or RRAs would be a giant step forward towards the recovery of rockfish in Puget Sound. We encourage WDFW to implement this action step that the authors of the PSRCP so clearly point out is necessary for the recovery of rockfish.

Thank you for the opportunity to comment on the Draft PSRCP and Draft PSRCP EIS.

Sincerely,

Phil Green

The Nature Conservancy
Protecting nature. Preserving life.™

1917 First Ave.
Seattle, WA 98101

Tel (206) 343-4345
Fax (206) 343-5608

nature.org/
Washington

Yellow Island Steward
The Nature Conservancy of Washington

From: Mystic Sea Charters
To: SEPADesk2 (DFW);
Subject: Comment on SEPA No. 09084
Date: Monday, January 04, 2010 2:30:55 PM

January 4, 2010

Washington State Department of Fish and Wildlife

Re: Puget Sound Rockfish Conservation Plan

To Whom It May Concern,

Thank you for your inquiry about the condition of the San Juan Islands. This letter and recommendation are in reference to your request regarding the critical importance of the San Juan Island under water habitat.

My knowledge of the area is hands on and goes back a hundred years. My Grandparents homesteaded and were the first settlers of Blakely Island. My parents were farmers and fisherman who lived on Lopez Island. I was born and raised on Lopez Island and have spent my life working in these waters. I have been a commercial fisherman, charter boat operator, and have been involved in research projects here in the San Juan Islands.

It's a wonderful thing to have eighty-three National Wildlife Refuges / Marine Sanctuaries in the San Juan Islands for our aquatic treasures to grow and prosper. But, do they? You can't just have sanctuaries and not monitor and take care of them and expect them to thrive. Our underwater habitat is of the utmost importance for the future of our existence. Although we are lucky enough to live amongst these sanctuaries, there is little known about the inner workings of the habitat and unfortunately are off limits to the very people who support them.

A farm does not grow itself without cultivation, care and maintenance. All of us have to wake up! These sanctuaries and the underwater area of the San Juans are the basis of our whole ecosystem. To take care of this delicate ecosystem it needs to have study, maintenance and clean up. The sea floor of all these areas need to have updated sea floor mapping completed. This needs to be done with multi beam sonar along with an ROV for close up assessment and debris removal. The marine habitat mapping of the reef areas need to be used to identify the crucial subtle habitat. This data will give us the basis for a specie habitat assessment. The objective needs to be the marine ecosystem.

The present ongoing cleanup and monitoring of the Monterey Bay Sanctuaries in California are prime examples of what can be accomplished and must be done here in the San Juan Islands. Taking care of the eighty-three sanctuaries of the San Juan Islands needs to be a number one priority - from creosol removal on their shores to garbage cleanup under the water to sea life assessment and enhancement. By doing this and taking care of our sanctuaries we will increase the sea life from the bottom up. Everything from crab to shrimp, rockfish, octopus, salmon, whales and more will benefit from such a program. Life begins and life ends as we know it in the sanctuaries of the San Juan Islands.

Your time and consideration on these matters are greatly appreciated.

Sincerely,
Monte Hughes
Mystic Sea Charters
800-308-9387 / cell: 360-941-3378
email: info@mysticseacharters.com

From: John & Nancy Woolley
To: Eturaspe, Teresa A (DFW);
Subject: Rockfish and the need to establish Marine No Fish Areas
Date: Monday, January 04, 2010 1:58:29 PM

264

Washington State Department of Fish ands Wildlife:

Teresa

Puget Sound is high on the list of Threatened Marine Areas. We have the second most unstable complement of fish stocks in North America.

Favorite fishing spots are now the 1% that remains of what was once a bountiful industry. No wonder there is concern about creating no fish zones. We must set up gene pool reserves as soon as possible. In general, within Marine Preserves:

- fish density doubles
- total biomass nearly triples within five years
- a 30% increase in biodiversity results
- outside areas are replenished by the survival of 3 to 5 times more juvenile fish
- this supports trophy and recreational fishing
- protection not only from genetic drift, as well as making larger fish available to reproduce, resulting
- more big fish outside the protection areas

Rockfish, which have much varied recovery rates, need a no harvest zone to stock the neighborhood.

We need to take the long-run view.

Thank you,

John Woolley, president
Olympic Forest Coalition – OFCO
1606 E. Sequim Bay Rd.

From: Andy Holman
To: SEPADesk2 (DFW);
Subject: Rockfish Proposal
Date: Monday, January 04, 2010 1:40:18 PM

Department of Fish & Wildlife,

•

I am writing to you in response of the DEIS rockfish draft & the Puget Sound Rockfish Conservation Plan. I appreciate to what great extents that the information was collected & put together, especially with budget cuts & even more on the horizon.

I read over the plan and came across what appears to be a major error as the information reads in section 2.7.7 Food Dynamics 2nd paragraph. (Harbour seals number 14,000 and consume 4% of their weight a day at 140lb average, based on those numbers it states that food consumption in the Puget Sound is quite high at over 5-million pounds annually.)

With my calculator in front of me I come up with a much more startling number, that without excuse needs to be addressed. Here is my math: 14,000 harbour seals for the Puget Sound, 140lb average, 4% of body mass for total daily consumption, 365 days a year, harbour seal consumption of 12% rockfish diet.

14,000 x 140=1,960,000lbs of harbour seal body mass x .04 = 78,400lbs a day food consumption for harbour seal x 365 = 28,616,000lbs a year x .12 = 3,433,920lbs of Rockfish a year being consumed by harbour seals. If over 5,000,000lbs is quite high, what do you use to explain 28,616,000 pounds annually?

Recreation impact approx. 39,000lb a year on rockfish (13,000 x 3lbs) compared to 3,433,920lb which equates to Recreation fisherman roughly 1.1% of combined seal & rec. fishing impact on rockfish stocks. We have a major problem here and it is not the recreational fisherman. Seals do have a major impact, near catastophic I suggest.

How do you address 28,616,000 pounds?, it appears that harbour seals are an extremely high stressor, not only rockfish populations, but all fish that live and migrate through the Puget Sound.

I can not comprehend why the WDFW would not request to take immediate action in lethal removal of harbour seals to a sustainable population for both seals & fish. There is verbage that states that the seals are reaching a maximum sustainable population. At what expense is that? Until the waters they live in won't produce any food any more? How do you factor in the impact that harbour seals are having with the J,K,L Orca pods?

So, as for the current conservation plan I am against it, unless it immediately address's the much needed reduction in the harbour seal population. I am willing to be part of conservation if it makes a difference, but I am convinced all will be lost without also dealing with the corrected 28,616,000 total pounds of seal diet (salmon, herring, rockfish, squid etc.) being consumed annually in the Puget Sound. I think a more appropriate tool would be to have rockfish retention during halibut and ling cod seasons and then close rockfish retention during the rest of the year. Thank you for considering my ideas.

Andy Holman
Associate/GPS Technician
www.sanjuansurveying.com
andy@sanjuansurveying.com
360-378-2300 Office
360-378-4140 Fax

266

From: Lorenz Hauser
To: SEPADesk2 (DFW);
Subject: Comments on Environmental Impact Statement for the Puget Sound Rockfish Conservation Plan
Date: Monday, January 04, 2010 12:54:34 PM

Dear Sir / Madam,

I would like to congratulate the WDFW team putting together this rockfish conservation plan and the associated draft environmental impact statement. This report synthesizes a lot of data and shows a very considerate yet realistic approach to management. The authors acknowledge that there is some need for further research into the biology of rockfish. I would like to suggest some important additional avenues of research, together with a proposal to implement them.

1. Larval biology

Probably because of data availability, the report focuses almost exclusively on adult rockfish. However, most mortality and dispersal occurs during the pelagic larval phase, and so year class strength, abundance and distribution of rockfish are primarily determined during that phase. Some indirect reference is made to these facts by proposals to develop network of linked MPAs. However, the pelagic phase of rockfish is essentially unknown, and further research is urgently required. Such research would primarily affect the following issues:

a. population connectivity

It is currently unknown how rockfish in different habitats and MPAs are demographically connected by larval dispersal. Such information is vital to develop a good scientific foundation to the design of MPA networks. Data already exist, but need to be collated in an accessible format. Additional data from oceanographic modeling, larval marking and genetic analysis are required, especially with a view of investigating temporal variation in dispersal patterns and possible effects of climate change on larval dispersal and mortality

b. source sink population dynamics

The DEIS provides some interesting insights into differences in rockfish behavior between artificial and natural habitats (p20), suggesting lower quality of artificial habitats. Furthermore, differential productivity of different habitats is inferred on p 34: 'The contribution of rockfish living in urban, contaminated areas to the full reproductive output of all Puget Sound populations is unknown and needs to be quantified'. This is really true for all habitats. These aspects need further research because there is a potential that some habitats harbor sink populations that may provide fishing opportunity but do not contribute to the reproductive output of the stock. If confirmed, this would suggest that MPAs should be sited around identified source populations, not sink habitats. Research into population connectivity can provide insights into these source-sink population dynamics, which in my view need urgent attention to establish priority sites for conservation.

c. selective mortality

The DEIS mentions the fact that rockfish are characterized by highly variable recruitment and voices concern about the potential effects of climate change on recruitment patterns. A crucial area of research would be the extent and effect of selective mortality, that is, the interaction between the genetic constitution of the spawning stock and survival and recruitment of offspring. It stands to argue that a spawning stock of long-lived fish represents a genetic legacy of past environmental conditions, thus potentially affecting survival of offspring under changing climate influences. While the genetic composition of the spawning stock cannot be changed, improved insights into such selective effects may contribute greatly to the identification of potential source populations mentioned above.

2. Genetic effects
Genetic change is considered, but only in terms of fisheries selection. While this is an issue of common concern, Puget Sound rockfish may also be subjected to other kinds of selection, for example, adaptation to pollution which may adversely affect other fitness traits. More significant for rockfishes in Puget Sound may be the threat from hybridization. Hybrids between brown, copper and quillback rockfish have been found in Puget Sound but not on the coast, and it is unknown whether anthropogenic environmental changes led to an increase in hybridization within the sound. For example, it is feasible that oxygen depletion in deeper waters cause a compression of species distribution to shallow areas and thus more opportunity for interspecific mating. Extensive hybridization would be a significant threat to species conservation and would need to be addressed.

These gaps in knowledge are all significant and would be costly and time consuming to address. As outlined in the DEIS and the rockfish conservation plan, more extensive collaboration with outside institutions should be sought. WDFW is here in the unique position to be able to provide ecological field knowledge as well as an equipment base to carry out field research. It therefore would be most cost-effective for the WDFW to engage in collaborative proposals with outside bodies to address these research topics. Furthermore, it may be worth to accompany such efforts with increased outreach to the public and to funding bodies.

I hope these comments are of some help. I would be glad to discuss the issues above further or provide additional comments if desired. Thank you again for putting such an important document together.

Yours sincerely

Lorenz Hauser

Dr Lorenz Hauser
Associate Professor
School of Aquatic and Fishery Sciences
University of Washington,
Box 355020, Seattle WA 98195-5020
Phone 206 685 3270, Fax 206-543-5728
http://fish.washington.edu/people/hauser/

From: Slabhunter
To: SEPADesk2 (DFW);
Subject: rockfish
Date: Monday, January 04, 2010 12:49:28 PM

167

I'm opposed to the Marine Protected Area concept. I favor the rockfish recovery designation to teach commercial and sport fishers the sensitive areas.
I believe we need to restrict crab and prawn harvest to provide a greater forage base for our rockfishes.

No commercial or sport directed rockfish harvest should be allowed in the Salish Sea until better stock/species inventory.
We need a set of goal thresholds and exit strategy.
All gill nets need to be marked every five fathoms to identify owner. Owner must report location of any lost/derelict nets or forced to pay removal costs if not reported.
Commercials and anglers may not remove the rockfishes from the water.

Regards,
Hans Mak
Shelton,98584

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

264

November 19, 2009

Teresa Eturaspe, SEPA Responsible Official
WA Department of Fish & Wildlife
Habitat Program
600 Capital Way North
Olympia, WA 98501-1091

Dear Ms. Eturaspe:

Thank you for the opportunity to comment on the draft environmental impact statement for the Puget Sound Rockfish Conservation Plan project located in the Puget Sound. The Department of Ecology (Ecology) reviewed the information provided and has the following comment(s):

SHORELANDS/WETLANDS & ENVIRONMENTAL ASSISTANCE: Alex Callender (360) 407-6167

A Substantial Development permit, Shoreline Conditional Use permit or Shoreline Variance may be required for project components with in Shoreline Jurisdiction. When project specific activities are proposed, I suggest the WA Department of Fish and Wildlife contact the local agency for further consultation regarding placement of Structures and other development activities.

WATER QUALITY: Roberta Woods (360) 407-6269

Individual projects in the overall conservation plan may need a Construction Stormwater National Pollution Discharge Elimination System (NPDES) permit. The NPDES permit coverage is needed when construction site with one or more acres of disturbed soil surface have pre-existing offsite drainage to waters of the state or will have offsite drainage during the construction period. The permit application form, called a Notice of Intent (NOI), is available on Ecology's website at: http://www.ecy.wa.gov/programs/wq/stormwater/construction.

We recommend the applicant to allow up to 60 days to submit a completed application form and to publish the two required public notices. We will supply project-specific comments on water quality aspects of the conservation plan as the projects are proposed.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(SM: 09-6070)

cc: Alex Callender, SEA
Roberta Woods, WQ

Black Hills Audubon Society

A Washington State Chapter of the National Audubon Society
(360) 352-7299 www.blackhills-audubon.org
P.O. Box 2524, Olympia, WA 98507

Black Hills Audubon Society is a volunteer, non-profit group whose 1,100 members in Thurston, Mason, and Lewis Counties are concerned about wildlife, their habitats, and natural history.

4 January 2009

Teresa A Eturaspe, SEPA/NEPA Coordinator
Washington Department of Fish and Wildlife
600 Capitol Way North
Olympia, WA 98501-1091

Dear Ms. Eturaspe:

This letter contains comments on the WDFW's Draft Environmental Impact Statement (DEIS) for the Puget Sound Rockfish Conservation Plan.

The members of the Black Hills Audubon Society, which represents over 1100 members in Thurston, Mason, and Lewis counties, value the state's natural ecosystems and the diverse fish and wildlife species that are part of those ecosystems. As such, we are concerned about the decline in the Puget Sound rockfish populations.

The following are comments on the Range of Actions proposed:

Natural Production: Support the preferred Alternative 2
However, the selection process of the key species should be documented, including how focusing on the key species will ensure that the non-key, but more threatened, species will be protected.

Habitat: Support the preferred Alternative 1

Fishery Management: Support the preferred Alternative 1
This management strategy must include, where necessary, limiting the harvest of other fish groups such as salmon, to protect vulnerable rockfish from mortality due to by-catch.

Ecosystem: Support Alterative 2
Despite the lack of complete understanding of Puget Sound food webs, some attempt to protect the existing functions of the key rockfish species should be made.

Monitoring, Evaluation and Adaptive Management: Support Alternative 2
However, we strongly encourage broadening this action to include as many other non-key species as possible, and we encourage the Department to make use of volunteer information when state research data is lacking.

Research: Support Alternative 1
While it may be prudent to focus on key species for monitoring and fisheries management, it is still important to understand other species as well.

Outreach and Education: Support the preferred Alternative 1
We stress the importance of educating the general public and the fishing community about rockfish habitat and life cycle requirements.

Enhancement: We do not support the use of hatcheries nor artificial reefs. Resources should be used to restore natural habitat, not to establish reliance on hatchery production or man-made structures.

Additionally, we are concerned that the plan omits those marine waters east of the Bonilla-Tatoosh Line at Cape Flattery to the Sekiu River mouth. That area is covered by the Puget Sound Groundfish Management Plan (1996), and it contains a rich and diverse number of rockfish species.

Thank you for the opportunity to comment on this plan.

Respectfully,

Sam Merrill

Sam Merrill, President
Black Hills Audubon Society

270

From: lucas hart
To: SEPADesk2 (DFW);
Subject: Rockfish Conservation Plan Comment
Date: Monday, January 04, 2010 9:24:40 AM

Dear WDFW representative:

Thank you for recognizing the need to protect Puget Sound rockfish and for your efforts in developing a sound conservation plan. I would like to suggest that WDFW adopt a conservation plan that utilizes an ecosystem based approach, i.e. marine reserves. The susceptibility of rockfish to by catch and the complicated life history of rockfish depend on such measures to assure population recovery.
Developing a well placed network of reserves will benefit all parties involved in this important issue and protect wild populations.
Although artificial reef creation may need to be used within marine reserves, this should not be the focus of any recovery option since rockfish are not habitat limited in the Puget Sound. A hatchery based approach should also be avoided at this time until marine reserves are given adequate time to determine whether wild populations may recover.

The general public and many other stakeholders largely do not understand the complications of rockfish biology or the benefits of marine reserves. WDFW should develop an educational aspect of the rockfish conservation plan to inform people on rockfish life history, their importance to Puget Sound, the threats that have lead to their current state and how the ecosystem is important to their survival.

Lucas Hart
72 Carli Ct.
Port Townsend, WA 98368
360-797-3966

271

From: jmlongstreth@aol.com
To: SEPADesk2 (DFW);
Subject: Comments for the Puget Sound Rockfish Plan
Date: Monday, January 04, 2010 6:28:19 AM

January 4, 2010

Department of Fish & Wildlife,

I am writing to you in response of the DEIS rockfish draft & the Puget Sound Rockfish Conservation Plan. I appreciate to what great extents that the information was collected & put together, especially with budget cuts & even more on the horizon.

I read over the plan and came across what appears to be a major error as the information reads in section 2.7.7 Food Dynamics 2nd paragraph. (Harbour seals number 14,000 and consume 4% of their weight a day at 140lb average, based on those numbers it states that food consumption in the Puget Sound is quite high at over 5-million pounds annually.)

With my calculator in front of me I come up with a much more startling number, that without excuse needs to be addressed. Here is my math: 14,000 harbour seals for the Puget Sound, 140lb average, 4% of body mass for total daily consumption, 365 days a year, harbour seal consumption of 12% rockfish diet.

14,000 x 140=1,960,000lbs of harbour seal body mass x .04 = 78,400lbs a day food consumption for harbour seal x 365 = 28,616,000lbs a year x .12 = 3,433,920lbs of Rockfish a year being consumed by harbour seals. If over 5,000,000lbs is quite high, what do you use to explain 28,616,000 pounds annually?

Recreation impact approx. 39,000lb a year on rockfish (39,000 x 3lbs) compared to 3,433,920lb which equates to Recreation fisherman roughly 1.1% of combined seal & rec. fishing impact on rockfish stocks. We have a major problem here and it is not the recreational fisherman. Seals do have a major impact, near catastophic I suggest.

How do you address 28,616,000 pounds?, it appears that harbour seals are an extremely high stressor, not only rockfish populations, but all fish that live and migrate through the Puget Sound.

I can not comprehend why the WDFW would not request to take immediate action in lethal removal of harbour seals to a sustainable population for both seals & fish. There is verbage that states that the seals are reaching a maximum sustainable population. At what expense is that? Until the waters they live in won't produce any food any more? How do you factor in the impact that harbour seals are having with the J,K,L Orca pods?

So, as for the current conservation plan I am against it, unless it immediately address's the much needed reduction in the harbour seal population. I am willing to be part of conservation if it makes a difference, but I am convinced all will be lost without also dealing with the corrected 28,616,000 total pounds of seal diet (salmon, herring, rockfish, squid etc.) being consumed annually in the Puget Sound.

Jamie Longstreth
Lifetime Resident
Of Washington State
CCA Member
1737 Main St.
Lynden, Wa. 98264

271

From: jmlongstreth@aol.com
To: SEPADesk2 (DFW);
Subject: Comments for the Puget Sound Rockfish Plan
Date: Monday, January 04, 2010 6:28:19 AM

January 4, 2010

Department of Fish & Wildlife,

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Jamie Longstreth
Lifetime Resident
Of Washington State
CCA Member
1737 Main St.
Lynden, Wa. 98264

272

January 3, 2010

WDFW,
Thank you for this opportunity to provide written comment to the Draft Environmental Impact Statement (DEIS) titled: Puget Sound Rockfish Conservation Plan (PSRCP). The following comments are provided in addition to verbal comments that I provided at the Mill Creek and Friday Harbor meetings and written comments documented in public domain.

Major actions proposed in the 2010-2012 sportfishing regulations to 'protect' rockfish are placing unnecessary prohibitions on recreational fishing. These include;

1) Marine Area 4 (east of the Bonilla-Tatoosh line) to 13 – closed to the retention of bottomfish in waters deeper than 20 fathoms (120 ft);

2) Marine Areas 6- 13 – closed to the retention of rockfish;

3) Marine Area 4 (east of the Bonilla-Tatoosh line) – daily limit is 10 black and blue rockfish combined. No other species of rockfish may be retained;

4) Marine Area 5 –daily limit is the first black or blue rockfish caught, except west of Slip Point the daily limit is the first three black or blue rockfish caught. No other species of rockfish may be retained. Spearfishing for rockfish of any species is not allowed.

(new) Proposal added October 16, 2009: (Marine Area 4 east of Bonilla Tatoosh) Closed to fishing for bottomfish and halibut to provide additional protection for bottomfish and halibut in the area and provide a world class destination for divers to view a cold water marine ecosystem.

These proposals are examples of unnecessary measures supported by the DEIS and potentially being placed into law through sport regulations to 'protect' threatened fish populations. Problem is, the threatened fish stocks are not found in 98% of the vast area of waters that will be closed to recreational fishing by these pending regulations. Preservationists have identified rockfish as the base of a pyramid for a plan that will inflict substantial damage to recreational fishing in the state of Washington. As exampled by California MLPA process, special interest groups are major forces supporting fishing closures and will likely reap major economic benefit from such actions. Recreational fishing provides major social and economic benefit to the state of Washington; its prohibition will have major consequences to its citizens and its government. WDFW and WDFW Commission should continue to provide leadership role in protecting resources of this state and to maximize the public recreational game fishing and hunting opportunities of all citizens, including juvenile, disabled, and senior citizens.

I request the WDFW and WDFW Commission to adopt principles put forward by Costal Conservation Association regarding Marine Protected Areas and No Fishing Zones and to incorporate these principles into the DEIS and future sportfishing regulations (note 1);

> The (WDFW and WDFW Commission) will protect (and preserve) access for recreational fishermen to all public fishing areas unless…
>
> > …there is a clear indication that recreational fishermen are the cause of a specific conservation problem and that less severe conservation measures, such as gear restrictions, possession limits, size restrictions, quotas, or closed seasons will not adequately address the targeted conservation problem.
> >
> > …the closed-area regulation includes specific, measurable criteria to determine the conservation benefit of the closed area on the affected stocks of fish and provides a timetable for periodic review of the continued need for the closed area at least once every three years.
> >
> > …the closed area is no larger than that which is supported by the best available science.
> >
> > …provision is made to reopen the closed area to recreational fishing whenever the targeted conservation problem no longer exists.

Additionally, fisheries management should be data driven. It has been claimed by WDFW that threatened rockfish species are encountered by recreational fishermen in sensitive areas and to an unknown extent by commercial and tribal fisheries. The methods employed by WDFW to estimate recreational catch and mortality rates of threatened rockfish species are excessive and grossly inaccurate, commercial and tribal bycatch estimates are non existent in the DEIS. Similarly, WDFW estimates for rockfish bycatch caused by derelict nets are considered lower than actual. Good management depends on good data for good decisions. The recreational fishery will be increasingly dependent on accurate data for better management. You can decide what recreational, commercial, and tribal fishery data is needed for stock assessment and management and design a survey method to accomplish that goal. You have the opportunity here to define a system that will meet the needs of fishery managers for the foreseeable future. WDFW are using methods devised over a quarter century ago to estimate harvest trends as the absolute gold standard of accurately estimating true rockfish harvest. That is an unfair and untenable situation. The very future of the marine recreational fishery largely depends on the ability of managers to accurately estimate rockfish harvest and discards. (note 2).

Review of data provided by DEIS, WDFW, and NOAA indicate that it is likely that many of the Puget Sound fish stocks are incapable of recovering due to excessive predation from harbor seals and sea lions. The competition between harbor seals and Orcas for limited fish stocks may be a significant contributing factor to the low annual growth rate

of J,K,L populations since 2002. From review of this data, I have provided suggested changes to PSRCP DEIS, section 2.7.7.

Section 2.7.7
Harbor seals are year-round residents of Puget Sound whose population has expanded greatly since the 1970s. In the first half of the twentieth century the number of harbor seals in Washington State was reduced by a state-financed population control program, which considered harbor seals to be predators in direct competition with commercial and sport fishermen. Seals began to recover after the bounty program ended in 1960 and the Marine Mammal Protection Act was passed in 1972, increasing from a few hundred to over 14,000 in 2007. There are indications that the Puget Sound seal population has increased at annual growth rate of approximately 8% since 2002. (note 3)

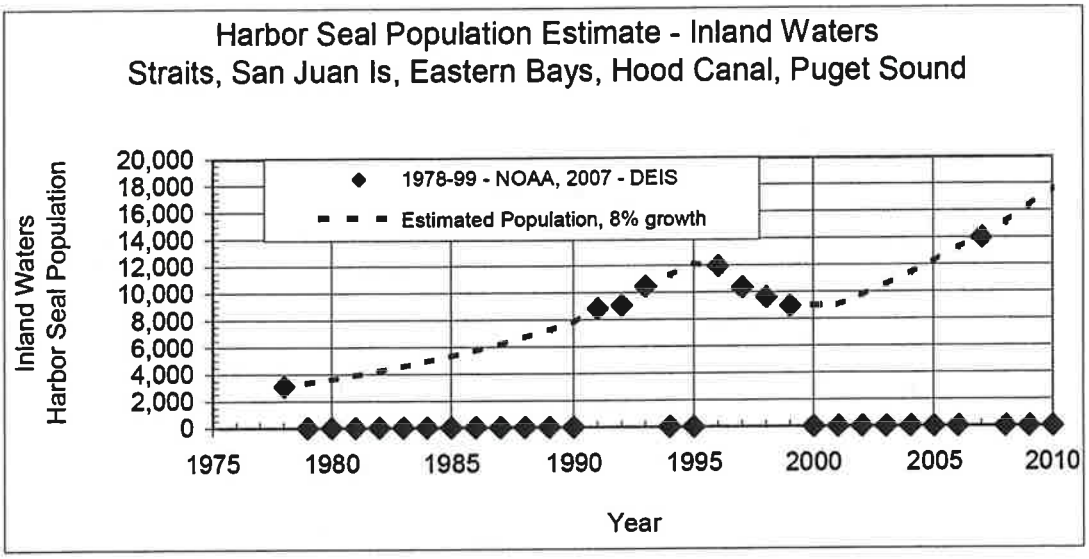
The average weight of harbor seals in Puget Sound is approximately 63 kg (140 pounds) and daily food consumption rates are between 4% to 10% of body weight. Based on these numbers, the estimated food consumption by harbor seals in Puget Sound is quite high, over 28 million pounds during 2007. (note 4)

In the San Juan Islands, where there are approximately 7,000 seals, rockfish comprise 12% of seal diets annually and 23% during the winter. It is estimated that in 2007, Puget Sound harbor seals consumed more than 3,400,000 pounds of rockfish. (note 5)

Lance and Jefferies concluded, "a small amount of localized predation" (by harbor seal) "could have a considerable effect on" (rockfish) "that spend the majority of their life in very small areas ("home ranges") on rocky reefs, and are among the slowest growing and longest-lived marine fishes on earth". (note 6)

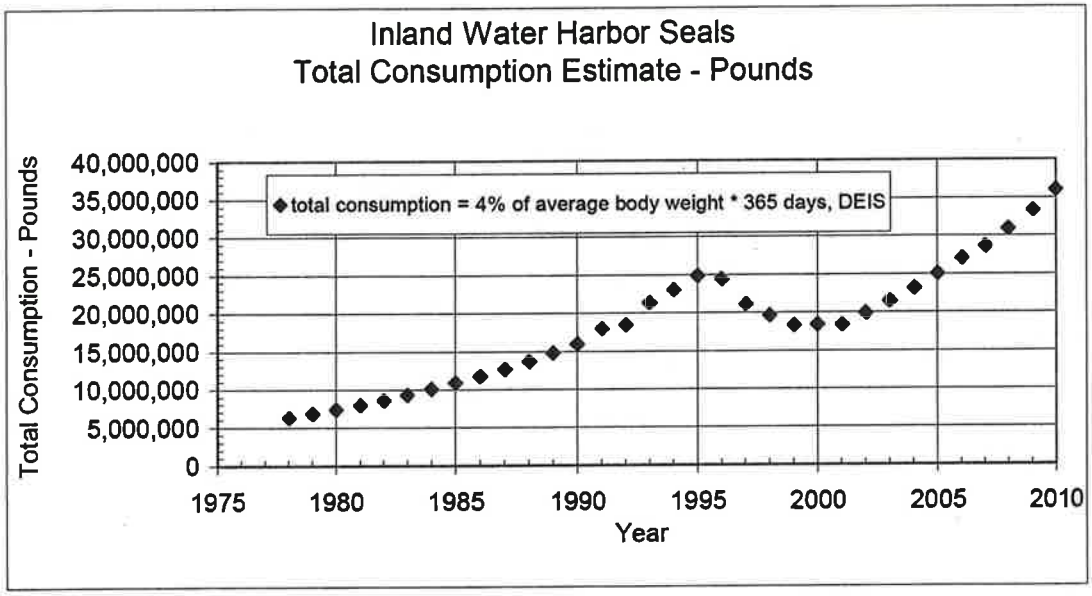
From these conservative estimates, it is likely that many of the Puget Sound fish stocks are incapable of recovering due to excessive predation from harbor seals. The competition between harbor seals and Orcas for limited fish stocks may be a significant contributing factor to the low annual growth rate of J,K,L populations since 2002. (note 7)

The following figures support the recommended changes to section 2.7.7 and were developed from data provided by DEIS, WDFW, and NOAA. Further study should be performed by WDFW and NOAA to identify impact to specific Puget Sound fish stocks from the growing presence of harbor seals and sea lions.

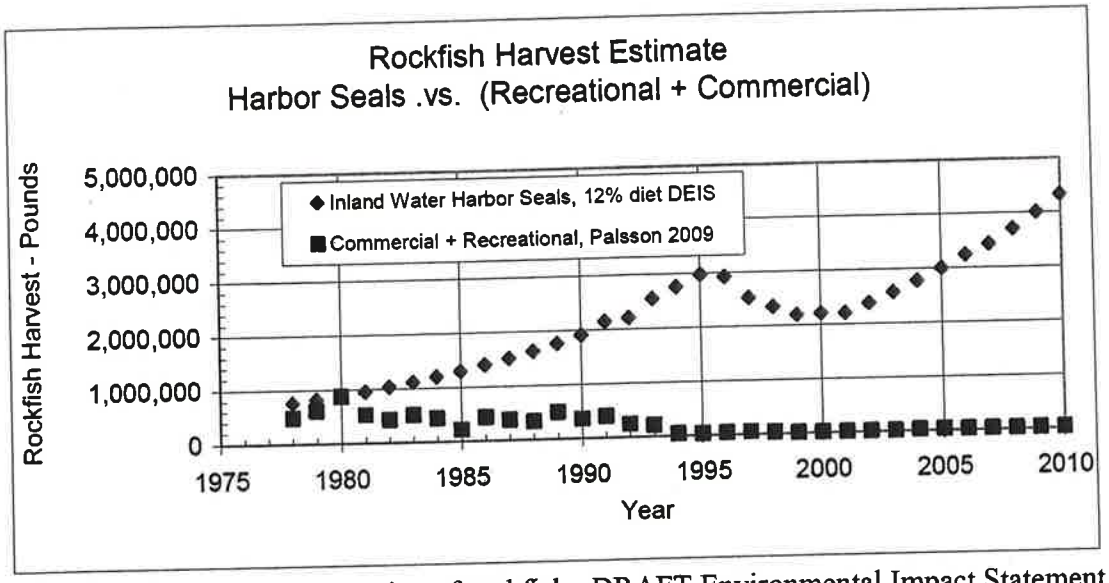


1978-1999 Seal Population; NOAA Alaska Fisheries Science Center Quarterly Report October November December 2002, "Trends and Status of Harbor Seals in Washington State: 1978-99" By Harriet Huber and Jeff Laake

2007 Seal Population; DRAFT Environmental Impact Statement for the Puget Sound Rockfish Conservation Plan, October 2009, section 2.7.7

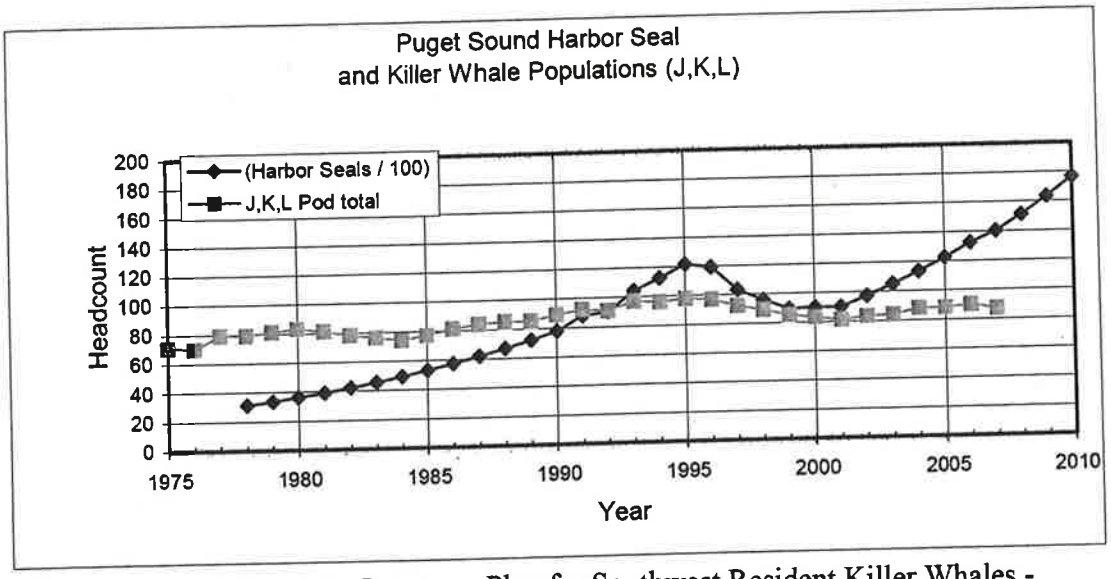


Annual Harbor Seal Consumption; DRAFT Environmental Impact Statement for the Puget Sound Rockfish Conservation Plan, October 2009, section 2.7.7



Annual Harbor Seal Consumption of rockfish; DRAFT Environmental Impact Statement for the Puget Sound Rockfish Conservation Plan, October 2009, section 2.7.7

Puget Sound Rockfish Harvest; "The Biology and Assessment of Rockfishes in Puget Sound" By Wayne A. Palsson et al. September 2009, figure 5.3 and figure 5.4



J, K, L pod population from Recovery Plan for Southwest Resident Killer Whales - National Marine Fisheries Service Northwest Region 2008

I recommend two actions to address this problem;

1) State of Washington request NOAA, NMFS to significantly increase escapement of salmon returning to Washington waters to accommodate the substantially increasing food requirements of seals and Orcas in Puget Sound. Maximum sustainable yield of salmon allowed by Magnuson-Stevens act should not be at the expense of the extinction of dependant and secondary species and the elimination of recreational fishing in this state.
2) Selective management of seal and sea lion populations should be employed to allow recovery of threatened fish stocks including; herring, salmon, steelhead, cod, and rockfish. For example, there is no reason that harbor seals should be allowed to prey on the endangered salmon stocks in north lake Washington every fall. I have seen this on many occasions and can only watch in horror.

Thank you again for this opportunity to comment on the Draft Environmental Impact Statement (DEIS) titled: Puget Sound Rockfish Conservation Plan (PSRCP).

Sincerely,
Gary Thomason
Brier, Washington

note 1: Statements derived from CCA's position on Marine Protected Areas/No Fishing Zones

note 2: Statements derived from Richen Brame testimony before the National Academy of Science Committee to review recreational fisheries survey methods.

note 3: Harbor seal populations were observed to decline 1995-1999 (NOAA AFSC Quarterly Report 4Q 2002), but recent estimates (PSAT 2007) indicate their population has since increased at annual growth rate of approximately 8%. (NOAA AFSC Quarterly Report 4Q 2002, Schmitt et al. 1995, Jefferies et al.2003, PSAT 2007, Trends and Status of Harbor Seals in Washington State: 1978-99 By Harriet Huber and Jeff Laake)

note 4: 14,000 seals * 140 pounds body weight /seal * .04 pounds daily food/pound body weight * 365 days/year = 28,616,000 pounds, year 2007. (4% Schmitt et al. 1995, NOAA study, 10% Sea-World documentation for male harbor seals)

note 5: 28,616,000 * .12 = 3,434,000, year 2007, (population and % from Lance and Jeffries 2007)

note 6: text is quoted from Lance and Jefferies (2007), page 2.

note 7: J, K, L orcas populations from Recovery Plan for Southwest Resident Killer Whales - National Marine Fisheries Service Northwest Region 2008

From: Curt Kraemer
To: SEPADesk2 (DFW);
Subject: PSRCP DEIS
Date: Sunday, January 03, 2010 12:57:15 PM

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Pleases find below my comments on the DEIS for the Puget Sound Rockfish conservation plan.

Thank you for the opportunity to comment on the DEIS for the Puget Sound Rockfish Conservation Plan (PSRCP). Please find below my comments on ways to increase the clarity, completeness, and accuracy of the information found in the DEIS. It is expected that the inclusion of that information will result in a better DEIS and in turn resulting in informed decisions.

This is a significant effort that is long over due. The results of this process will set the direction of rockfish management (and potentially other fisheries that may impact rockfish) for decades. For this reason it is of utmost importance that the PSRCP and it support document (The Biology and Assessment of Rockfishes in Puget Sound) use and be based on the very latest information possible. It is abundantly clear that over fishing had played a critical role in the collapse of the Puget Sound rockfish however recent management efforts (since the 1980s there has been a number of fisheries restrictions - in both the recreational and commercial fisheries) to limit fishing impacts; just one example was the establishment of a daily limit of one rockfish in the Puget Sound recreational fisheries in 2000. Given the longevity and slow grow of rockfish in general and most species of Puget Sound rockfish in particular it is expected to take a number of years to see population responses to management changes.

A key question in current and future Puget Sound rockfish management is to what degree has past efforts to address over fishing questions been successful. Given that the long term impacts from management decisions that will be driven by the PSRCP; both in the status of the region's rockfish populations and the potential of considerable impacts on a number of recreational fisheries ~~I believe that the~~ State and its managers are obligated to base their guidance documents and decisions on the best and latest available information. Much of the direction in both the RSRCP and agency's "The Biology and Assessment of Rockfishes in Puget Sound) is drive by the stock assessments complete in 1999. Since that time additional changes in management has occurred in addition it may well be the case that enough time has past to begin see whether there has been some positive population responses to changes in management direction since the early 1980s.

The only way to evaluate whether there has been any population changes would be to repeat the stock status determination effort of 1999 using the current information. Much of the 1999 stock status determination effort relied on creel information from the recreational fisheries which after 1993 was of limited value. In recent years (since 2004) the quality and quantity of the rockfish creel information has been improved substantially. For the first time in more than 15 years the managers now have available to them at least 5 years of good creel information upon which to base stock status information. The resource, its managers, the citizens concern with that resource as well those potentially impact by future rockfish management decisions would all be best served by taking to the time to insure that the latest and best information is used. To do so using the creel information available from 2004 to 2008 or 2009 to update various stock status as well the success or lack of success of past management changes is critical. It is only after that updated information is made available and considered can reasonable alternatives be developed and folks can provided informed input on those alternatives. Without that update/addition the DEIS is inadequate.

•

Specific comments by section.

2.1.1 -

With the potential ESA listing of 3 PS rockfish the PSRCP would be strengthen if the geographic Puget Sound region be refined so that the distinct population segment (DPS) for Puget Sound rockfish as defined by NOAA is readily considered. NOAA considered the DPS for the Puget Sound rockfish to be those waters east of the Victoria Sill (a line running more or less North/South from Victoria). To accomplish this the current north Sound region would have to be sub-divided into a north Sound area and an eastern strait area (the waters between the Sekiu River and the Victoria Sill. This will be both more responsive to ESA concerns and allow for a greater flexibility in management options.

Table 4 -

Bull trout probably should be added to the list of ESA listed species found in Puget Sound.

2.5.2 -

The recent creel information typically includes whether the bottomfish released in more or less than 60 feet of water. In discussing the number of rockfish encountered in various recreational fisheries the depth at which the released fish are caught should be important factor in looking at fishing related impacts. Inclusion of that information is another

example how the quality of the data being used in the decision making can be improved.

2.6 -
While it is true that the status of the rockfish can be seen in Paulsson 2009 it should made clear that those determinations were made a decade earlier. Further much of the creel information used in those determinations came from data prior to 1994. It is reasonable to expect that the stock status determined in that effort doesn't reflect any population responses to management changes during the later half of the 1980s to date.

I would like to see an expansion or clarification included for those stocks placed in the Precautionary Status. As noted stocks whose status is unknown (usually due to insufficient data) are placed in this category. Many rockfish species have been placed in the Precautionary status because their status is unknown; this includes a number of key stocks. While I support the cautionary approach for management of those unknown stocks I think it is important to the public and others that they know why individual stocks are placed in this category. As such I request that such stocks be noted as having an unknown status be noted as - Precautionary/unknown (followed by why its status is unknown - lack of data etc).

Table 8 -
While nearly everyone can agree that past fishing practices had severe impacts on the rockfish populations and those practices are correctly considered to be a high stressor. However fishing impacts should be considered in two parts - past fishing impacts and current fishing impacts. I suspect that current fishing impacts are not near the stressor that the past fishing impacts were. That clarification is important in allowing folks to key in on what is currently limiting Puget Sound Rockfish. From the information available in the DEIS it is clear that current annual fishing impacts are small fraction of what they were in say 1980.

Age truncation is a significant problem with long lived species and clearly that needs to be addressed. From the information available in agency's Rockfish assessment paper it is clear that at least for species such as copper and quillback rockfish the available length frequency information since 2004 indicate that there are increasing numbers of larger fish (at least as reflected in creel checks). That would seem to indicate at least some rockfish populations are recovering from age truncation problems and moving towards more stable age structures. This illustrates the importance of including the latest information in assessment efforts. That

kind of information is not available for most Puget Sound rockfish species does the fact those stocks expected to respond the quickest (for example coppers) are doing so indicate that management changes in the last 2 decades are helping? Is it unreasonable to hope that some of the rare and slower responding stocks may also eventually respond in a positive fashion?

2.7.3 -
Derelict fishing gear has correctly been identified as high stressor. Fortunately there are excellent ongoing projects to remove some that derelict gear. However it should be noted that commercial fisheries are still losing gear and there is a ongoing annual impacts from lost fishing gear on rockfish populations. Efforts are needed to not only remove that gear but to also reduce the amount of gear being lost and to improve the reporting of lost gear. In short given the magnitude of the impacts from derelict gear there may need to additional fishing reductions in commercial fisheries to minimize the amount of derelict gear stressing various rockfish stocks; much as being suggested for recreational fisheries.

2.7.5.3 Chemical contamination -
While this is probably a moderate stressor for adult rockfish it may well be another matter for the youngest larvae/juveniles. As noted it is thought that chemical contamination is likely to be adversely affecting reproduction success. Given the general sporadic nature of rockfish spawning success stressors that further reduce the frequency or overall success of individual spawnings may be critical. For that reason I think that this issue should be considered a high stressor.

2.7.7 -Food web considerations.
There are math errors in the calculations of the seal impacts on the San Juan rockfish. That error has resulted in a underestimation of the impacts from seal predation. With the inclusion of corrected values one could argue that those impacts are high stressor (at least for the San Juan stocks). It was incorrectly reported that the San Juan seals annual forage was 5 million pounds. When I did the math I got something like 14 million pounds of forage consumed annual. Of that using the reported 12% being rockfish we have 1.7 million pounds of rockfish being consumed annually in the San Juan Islands. To put that in perspective that 1.7 million pounds is approximately 3 times the average annual harvest rates seen in the commercial and recreational fisheries during the late 1970s to early 1980s (the era of clear over fishing).

3.2 -
All species verus key species approach. Given the difficulties in

monitoring the status of many of Puget Sound Rockfish species it make sense; to at initially to use a key species approach. The seven species suggested seem like a reasonable representation for Puget Sound rockfish.

However if it is decided to go in that direction it would be very helpful up front to include how each of the key species is current being monitored, what information has been and will be used to determine and track that species status. Without a plan on how to track the status of the various Puget Sound rockfish there is no change in determining whether there has been any success in address factors limiting the populations. The status determination of several of the several suggested "key" species relied on length frequency information from creel checks. If it is decided to end the harvest of rockfish in Puget Sound what information is available to replace that creel information?

In the DEIS it was suggested that one option would be to use 7 key Puget Sound rockfish species as indicators. Those seven species were copper, quillback, black, yelloweye, bocaccio, canary, and Puget Sound rockfish. Of those 7 three of the species yelloweye, black and bocaccio had status determinations (for both southern and northern populations) as precautionary. In all three cases that rate was due to the unknown status of the populations due to insufficient information. The canary stocks were rated as depleted however once again little information was available to rate Puget Sound canary stocks; that depleted status was based on the trends and status of the coastal canary population.

Alternatives -
Because of the issues/data gaps discussed above I'm not sure that there currently adequate information presented in the DEIS to make informed decisions on the selection of appropriate alternatives. That said I would generally support the second most conservative alternative in each area.

Thank you for your consideration.

Curt Kraemer
8029 57th DR NE
Marysville, Wash. 98270

425-870-1722

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From: Michael Maddox
To: Eturaspe, Teresa A (DFW);
Subject: Letter in Support of the Puget Sound Rockfish Conservation Program
Date: Friday, January 01, 2010 9:35:44 AM

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31 December 2009

Michael Maddox
2441 NE Trailway Road
Poulsbo, WA 98370-6921

(360) 697-4708
effpgpgm@yahoo.com

Ms. Teresa A. Eturaspe
SEPA/NEPA Coordinator
600 Capitol Way North
Olympia, WA 98501-1091

teresa.eturaspe@dfw.wa.gov

Dear Ms. Eturespe,

This is the electronic copy of the letter that I mailed yesterday to the Dept. of Fish and Wildlife via conventional mail. I also mailed it to Senator Rockeller, Representative Rolfes, and Representative Appleton, all of the 23rd District.

Please support initiatives to establish 20% of the Puget Sound management as No-Take Marine Reserves.

Why?

1. Puget Sound fish have lost many of their necessary ecosystems.
The significant decline in Puget Sound Marine Fisheries over the past several decades, in large part, is due to the loss of untouched ecosystems necessary for fish during their different stages of reproduction and growth. As the human population in the Northwest continues to grow, near shore environments (which serve as nurseries for fish) are developed and made unavailable for the fish life-cycle. The current patchwork of sixteen small Marine Reserves in the Sound represents an attempt to protect our hardest hit waters, but what is needed is a

proactive and comprehensive plan to set aside 20% of the Puget Sound as No-Take Marine Reserves.

2. The big fish and the big numbers of fish are gone.
Puget Sound fishing of endemic species is now at 1% of historic levels. Selective fishing of large fish has led to the steady decline in the size of fish, consequently selecting for small fish genes...and small fish produce fewer larvae than do large fish. . We try to keep our waters full with hatchery produced (and expensive) fish, but Marine Reserves will replenish our waters more effectively and more economically.

3. No-Take Marine Reserves work.
Thirty years ago the famous New England Grand Banks cod industry collapsed; the equally famous United Kingdoms herring industry also collapsed; and currently the world's seven major fishing industries are severely depressed and expected to collapse by 2049, largely due to over fishing.
Many nations, responding to the collapse of fisheries in their oceans, have established Marine Reserves. When undisturbed, fish reproduce abundantly, increasing their numbers and size. In a global review of marine reserves, biomass increased 413% and fish size increased 82%. New Zealand, for example, established its first Marine Reserves much over the objections of local fisherman. Because fish don't recognize boundaries on a map, the waters outside the richly productive Reserves now teem with large numbers of big fish. This great success first led to the establishment of Reserves all around New Zealand, with commercial and recreational fisherman now being some of their biggest advocates. Consequently, New Zealand has made 20% of its Exclusive Economic Zone into Marine Reserves and Australia is about to follow suit. This is a huge decision.

4. The Reserves need to be "No-Take." They provide refuge.
Compromising the no take status of a Reserve—by allowing selected fishing within it, or in allocating Reserves that are too small—will unwisely compromise the recovery of fish in the Puget Sound. Our target should be to restore (over several decades) within the Reserves, the rich natural ecosystem that produce big fish and numbers of fish that can then spill out into the rest of the Sound. Think long-term.

5. Don't wait too long.
Marine Reserves work...if established in time. There's a critical number of species and genetic composition necessary to maintain a species and an ecosystem. The

Grand Banks, which for 300 years supplied cod to Europe and North America, collapsed under the onslaught of modern fishing fleets equipped with the best of fish finding and fish processing gear, as well as thoughtless fishing practices such as dragging the bottom. Despite 30 years of restrictions, and the rusting of the previously extensive New England fishing fleet, the Grand Banks fishing industry is just now starting to limp back to life. Be proactive and establish No-Take Marine Reserves in Puget Sound now while we still have the ecosystems and species essential to building back our fish stocks.

Please support the establishment of 20% of the Puget Sound Management area as No-Catch Marine Reserves.

Respectfully,

Michael Maddox

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From:	Mary Knackstedt
To:	SEPADesk2 (DFW);
cc:	Ginny Broadhurst (NWSTRAITS); Steve Revella; barbaram@portfridayharbor.org; Mkaill@rockisland.com; rrstrath@u.washington.edu; sebens@u.washington.edu; davidloyd@gmail.com; pgreen@tnc.org; krawson@tulaliptribes-nsn.gov;
Subject:	Comments on rockfish management
Date:	Thursday, December 31, 2009 12:59:09 PM
Attachments:	rockfisheiscomments12-31-09 final signed.doc 2003MRCRockfishWorkshop.pdf Eisenhardt et al Conservation Biology submitted no images (2).doc

Please accept our comments on the draft EIS and Puget Sound Rockfish Conservation Plan. We are also attaching two reports that were prepared for the MRC for your information. One is a summary on rockfish research presented at an MRC workshop in 2003 and the other (Eisenhardt, et al) is an evaluation of voluntary bottomfish recovery zones in the San Juans.

Thank you for the opportunity to comment on the plan. Please contact me if you have any questions.

Mary Knackstedt
Coordinator
San Juan Marine Resources Committee
360-370-7592

San Juan County
Marine Resources Committee
PO Box 947
Friday Harbor, WA 98250
360-370-7592 maryk@co.san-juan.wa.us

san juan county
marine stewardship area
our sea · our source · our future

December 31, 2009

Mr. Phil Anderson
Washington Department of Fish and Wildlife
600 Capital Way N
Olympia, WA 98501

Dear Mr. Anderson,

We appreciate the opportunity to comment on the proposed EIS for the Puget Sound Rockfish Conservation Plan. The San Juan County Marine Resources Committee has been concerned with rockfish populations for 15 years. In 1996, rockfish recovery was a top priority for the newly formed MRC, which felt that management agencies weren't responding quickly enough to the alarming decline in bottomfish populations. The MRC held public meetings and researched harvest records to identify sites that were once productive but fished out. From this input, eight areas were chosen to be voluntary no-take areas designated as Bottomfish Recovery Zones (BRZs). Eight reference sites with similar habitat were selected as reference points.

The MRC launched an extensive campaign to educate people about the need for protection and the harvest rules in the no-take zones. In 2003, the MRC hosted a rockfish symposium, inviting experts throughout the Northwest to meet and share scientific information about the status of rockfish populations. A paper developed by Mike Sato and Dr. Tina Wyllie-Echeverria[1] summarizing this research is included with this letter. To measure the effectiveness of the voluntary no-take zones, the MRC has periodically funded surveys to gauge rockfish recovery and fishing pressure in the area. In 2008, we hired the SeaDoc Society to produce a report[2] documenting how well the BRZs measured up to their reference sites and found that rockfish were not doing better in the voluntary reserves. Other research indicates that rockfish are recovering in regulated biological research reserves requested by the University of Washington Friday Harbor Labs.

Our experience in these local attempts to recover rockfish has shaped the comments in this letter. Further, the San Juan MRC is a member of the Northwest Straits Commission and the network of MRCs in the Northwest Straits region. We are in support of the Northwest Straits Commission's comments on the range of proposed actions in the EIS and have outlined a few other areas of emphasis as well.

Natural Production/Habitat
We support the Department's choice for the most conservative approach to protect and re-establish existing populations. Establishment of protected areas with suitable rockfish habitat should be the top priority in supporting recovery through natural production. This approach is likely more cost effective and has a higher likelihood of success with fewer unforeseen negative consequences than hatcheries or the creation of artificial reefs.

Habitat
Incorporating water quality with habitat protection and restoration makes sense; however, we urge the department to allocate limited resources for protecting areas that already have good rockfish habitat and high quality water before expending resources in creating artificial habitat or restoring degraded water quality.

Fishery Management
Enforcement along with effective outreach is needed to support any fishing regulations that are put in place. The success of protected areas or fishing regulations will ultimately depend on the public's acceptance of these strategies and faith in their value for recovering rockfish over many years. It will be important to educate people about the special vulnerability of rockfish populations, involve citizens in recovery efforts whenever possible, and craft meaningful progress reports about the management strategies that restrict people's access to the fishery.

Ecosystem
Since little is known about the needs of the early life stages of various types of rockfish, protection and restoration of kelp and eelgrass beds and natural ecosystem processes should warrant a higher conservation approach than the Department's choice of alternative 3 for this category. Obtaining a better understanding of life histories will be an important step in informing management strategies responsive to environmental, climate-change and fisheries impacts. In the meantime, protecting biodiversity, the food web and other vital interconnections in the ecosystem exercises a precautionary approach which benefits many species and could prove critical for rockfish recovery. We are in agreement with the Northwest Straits Commission in recommending alternative 2 for this category.

Research
Reproductive output, genetics and biodiversity should be evaluated explicitly when comparing the effectiveness of natural production, hatcheries and artificial reefs. As an example, Palsson and Pacunski[3] provide quantitative data for reproduction rates in protected versus fished areas.

Outreach
We agree with the recommendation for a strong outreach program to support rockfish recovery. MRCs have a long-term relationship with their communities in many of the

areas with the best rockfish habitat, thus are well situated to help design and carry out the education strategies and actions outlined in alternative 1.

Thank you for the opportunity to comment on the rockfish management plan. We look forward to working with you in its implementation.

Sincerely,

Kit Rawson, Chair
San Juan County Marine Resources Committee

[1]Sato, M., Wyllie-Escheverria, T., 2004. Best Science and Best Management for Rockfish and Lingcod in San Juan County. Prepared for the San Juan Marine Resources Committee

[2]Eisenhardt, E., Gaydos, J.K., Greene, H.G., Wyllie-Escheverria, T. 2009. Efficacy of voluntary marine reserves for recovering bottomfish. Prepared for the San Juan Marine Resources Committee

[3]Palsson, W., Pacunski, R., 1995, The Response of Rocky Reef Fishes to Harvest Refugia in *Puget Sound. Puget Sound Research 1995 Proceedings*, Puget Sound Water Quality Authority.

Title: Efficacy of voluntary marine reserves for recovering bottomfish

RH: Efficacy of voluntary marine reserves

Key Words: voluntary, no-fishing areas, marine protected area, marine reserve, habitat, lingcod, rockfish, *Sebastes* spp.
Word Count: 5,975

E. Eisenhardt,[*] J. K. Gaydos,[*] H. G. Greene,[‡§] and T. Wyllie-Echeverria [†]

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Abstract: In 1997, San Juan County, Washington (USA) created eight voluntary marine reserves to promote recovery of demersal fish, or bottomfish. Using SCUBA band-transects, divers collected data on population density and fish length-distribution of four bottomfish species in pairs of voluntary marine reserves and reference control sites in 2001, 2002, 2006 and 2007. We used these data along with benthic habitat maps and fishing effort observations to evaluate voluntary marine reserve efficacy, physical size, habitat, and fishing pressure relative to reference sites. We also compared these results to those from nearby mandatory reserves, which have shown beneficial reserve effects over similar time periods. Voluntary marine reserves showed no consistently different trends for four target bottomfish species compared to reference sites. Selection of appropriate habitat and insufficient time since reserve establishment were not likely causes for lack of voluntary reserve effect. Instead, poor volunteer compliance combined with limited reserve size contributed to ineffective voluntary marine reserves. The relationship between reserve efficacy and reserve size appears not to be independent of regulatory nature. Jurisdictions attempting to use voluntary reserves need to account for less than 100% compliance and plan reserve size accordingly.

Introduction

Effective marine reserves, also called no-fishing zones, no-take areas and marine protected areas (MPAs), can be associated with greater population densities, biomass, diversity of fish species, and larger individual size-distributions, as well as provide "spillover" benefits beyond the reserve boundaries (Roberts et al. 2001; Gell & Roberts 2003; Halpern & Warner 2003). Consequently, there is great interest in using marine reserves as a tool to recover declining fish stocks (Parker et al. 2000), especially for demersal species with small home ranges and high site fidelity such as many rockfish (*Sebastes* spp.) and other bottomfish (Lea et al. 1999).

In Northeastern Pacific temperate waters, marine reserves can increase the density, size and spawning biomass of lingcod (*Ophiodon elongatus*) and some rockfish species (Palsson & Pacunski 1995; Palsson 1998; Eisenhardt 2001; Berkeley et al. 2004a; Parnell et al. 2005). Additionally, reserves protect older, larger females which have been shown to have greater fecundity relative to mass and increased growth and survival of offspring (Berkeley et al. 2004b). Overfishing has led to rockfish and lingcod population declines in the inland marine waters of Washington State (West 1997) and rockfish stocks throughout the region have been described as at risk (Puget Sound Action Team, 2007). Despite reductions in daily catch limits and season length designed to protect and recover populations, these fish are still considered vulnerable to overexploitation (Stout et al. 2001; Musick et al. 2001; Mills & Rawson 2004).

In 1997, the San Juan County Marine Resources Committee (San Juan County, Washington State, USA), a volunteer body that advises the elected County Council on marine issues, was concerned about bottomfish declines and elected to institute a local "bottom-up" approach to aid state management recovery efforts. In Washington State, the Department of Fish and Wildlife and 19 tribes with usual and accustom fishing areas co-manage harvest of marine species (Rafeedie decision 873 F. Supp. 1422; 1994 U.S. District Court) and have jurisdiction for creating legally binding, mandatory marine reserves. In 1990, they created the San Juan Islands Marine Preserves, a system of mandatory marine reserves bordering terrestrial uplands owned by the University of Washington. Three of these reserves (Point Caution, Shaw Island, Yellow and Low Islands) encompassed rocky habitat. These three mandatory reserves have shown positive reserve effects compared to fished reference sites, including increased population density and greater length-frequency distribution of bottomfish species such as lingcod and rockfish (Palsson & Pacunski 1995; Palsson 1998; Eisenhardt 2001; Beaudreau & Essington 2007). Having no regulatory authority but encouraged by the results observed in mandatory reserves, the Marine Resource Committee created voluntary marine reserves. Community-based conservation and community-supported voluntary protected areas have been touted as an effective alternative to top-down centralized approaches to conservation (Horwich & Lyon 2007; Crawford et al. 2008), however voluntary marine reserves had never been previously attempted and scientifically evaluated in the Northeast Pacific.

At a series of public meetings, citizens identified zones that were once productive fishing areas for bottomfish but were now considered fished-out (Kaill 2001). This resulted in eight Bottomfish Recovery Zones (BRZs: voluntary marine reserves) where people were asked to voluntarily discontinue fishing for bottomfish (Fig. 1). Salmon (*Oncorhynchus* spp.) fishing was permitted, but people were specifically asked not to fish

for rockfish, lingcod, kelp greenling (*Hexagrammos decagrammus*), and cabezon (*Scorpaenichthys marmoratus*).

Since inception, it was recognized that the success of the voluntary BRZs would depend on intensive outreach and education efforts to inform the public about the potential benefits of marine reserves (Koski 2001). San Juan County, which has a land area of 1,609 km^2, is composed entirely of islands and has a relatively small number of residents (15,298 people in 2006; http://quickfacts.census.gov). However, it is estimated that visitors, many of whom come to fish, nearly double the population during certain times of the year and that the fishing pressure is significantly greater than one would expect based on the resident population alone. When voluntary reserves were established for bottomfish, the Marine Resources Committee actively worked to educate the local population and visitors that came to the region to fish. Thousands of color brochures were printed and distributed around the County, including at marinas, to boaters on the water, and other areas frequented by visiting recreational fishermen. In addition, posters were created and educational lectures were given to community groups on the larger islands. A full-page color advertisement was placed in the annual Washington State Department of Fish and Wildlife fishing regulation bulletin explaining the voluntary marine reserve concept along with a map identifying BRZ locations. These education and outreach efforts were continued for almost a decade. During some years this effort also included partially funding a boater education program that would visit BRZs and communicate with people found to be fishing within the voluntary zones.

The efficacy of marine reserves needs to be evaluated on a case-by-case basis to provide insight into how this fishery management tool can be most effectively used (Hilborn et al. 2004; Lundquist & Graenek 2005). After almost a decade of existence, we evaluate the effectiveness of San Juan County's voluntary BRZs for recovering target fish species. Additionally, we compared reserve efficacy, physical size, habitat, and fishing pressure with mandatory reserves in the area.

Methods

Fish count SCUBA surveys

Four observers on SCUBA completed visual band transects following a slightly modified protocol based on earlier work (Eisenhardt 2001). All dives were conducted in August or September to control for seasonal variation. Once observers entered the water, they descended to the seafloor and proceeded via the most direct route 1 m off the bottom to a depth of 20 m. The primary observer was tethered to a 25 m fiberglass measuring tape. While staying 1 m above the substrate, the primary observer pair moved across the seafloor at approximately 50 cm/s. The secondary diver pair remained stationary and held onto the tape reel as it unwound. For each fish encountered within a 2 m-radius sphere centered on the primary diver, the depth, species, and total length (to nearest cm) were recorded. Fish that swam off or through the transect as the primary observer approached were counted, the assumption being the observer's presence caused the fish to move. If possible, total fish length was determined by placing a measuring device (Paddack & Estes 2000) next to or below the lateral line of the fish, or by measuring the distance between two points on the substrate corresponding to points below the tip of the lower jaw and below the posterior portion of the ventral caudal fin ray (Martell & Wallace

2000). If the observer could not measure the fish, length was estimated. Target species included two rockfish: copper (*S. caurinus*) and black (*S. melanops),* as well as lingcod and kelp greenling.

Divers surveyed up to eight transects per dive using a systematic random sampling design. Data collection efforts focused in 15 – 20 m depths where densities of target species are typically greatest (Moulton 1977). The first three transects surveyed a constant depth of 20 m, the fourth started at 20 m and ended at 16 m, and subsequent transects continued to start 4 m deeper than they ended. The general linear model used for calculating population density statistics and discussed later is robust in regard to assumption of independence of samples.

Fish were counted in seven voluntary marine reserves (BRZs): Bare Island, Bell Island, Charles Island, Flattop Island, Kellet Bluff, Lime Kiln, and Pile Point (Fig. 1). Each voluntary BRZ was paired with a reference site that had similar habitat and was no more than 5 km from the associated BRZ. Specific habitat features considered in determining reference sites were bathymetry, general abundance of bottomfish, and total area. The Point Lawrence BRZ was not surveyed due to safety concerns regarding strong tidal down-wellings (Fig. 1). Human activity in the area, especially fishing, and its intensity were recorded before and after every dive.

Fishing effort

A single fishing pressure assessment of select BRZs with paired reference zones was conducted in 2003. Between 1 May and 15 June of that year (lingcod season), a motorized skiff was used to daily circumnavigate San Juan Island (Fig. 2). A random number generator determined the departure time of the observation vessel on each sampling day (8:00 a.m., 12:00 noon, or 4:00 p.m. local time). Seasonal closure of the recreational salmon fishery during sampling dates ensured no confusion regarding targeted catch of fishermen observed.

The sampling skiff was equipped with a Wide Area Augmentation System enabled Global Positioning System (GPS) with chart-plotting capability. The boundaries of mandatory and voluntary reserves and reference sites were entered into the GPS so that the observer could determine if a vessel was in these areas. Location of fishing activity observed was recorded. In addition, a 0.4 km adjacent zone was demarcated around each site to determine if fishermen were preferentially fishing adjacent to BRZs (Fig. 2). Accuracy was determined to be +/-50 m.

We collected anecdotal information on fishing activity in reserves numerous ways. We recorded fishing activity observed before and after all SCUBA surveys at BRZs and reference sites. We solicited marine water taxi operators, fishing guides, whale watch captains, and other local citizens who frequently passed BRZs while operating their business on the water. Many private citizens approached us with stories of people fishing in reserves.

Habitat mapping and evaluation

Fractured bedrock outcrops and areas of stacked boulders are considered optimal bottomfish habitat in the San Juan Archipelago (Pacunski & Palsson 2001). To distinguish marine benthic potential habitat types, acoustic multibeam echosounder (MBES) techniques were employed to map the seafloor in San Juan County. Habitat

maps were constructed using wide-swath digital MBES bathymetry and acoustic backscatter data and locally groundtruthed using sediment samples, video drop cameras and remotely operated vehicle video.

The MBES coverage was undertaken to obtain contiguous full seafloor coverage of the deeper water areas within the San Juan Archipelago. For areas >50 m water depth, a hull-mounted Kongsberg-Simrad EM1002 system, which operates at a frequency of 95 kHz utilizing 127 beams was used. For areas <50 m water depth a hull-mounted Kongsberg-Simrad EM3002 system, which operates at a frequency of 300 kHz utilizing 121-135 beams was used. In most of the areas, the tracks were positioned so as to insonify 100% of the seafloor with a 100% overlap, providing 200% coverage.

Positioning was accomplished using a broadcast Differential Global Positioning System (DGPS) and MBES data were corrected for sound speed variations in the stratified water column using frequent sound speed casts. The data were corrected for tides and then edited for spurious bathymetric and navigational points using CARIS software. Positioning using DGPS has a positional error of up to 5 m and vertical errors on the order of 1% water depth (International Hydrographic Organization, 1998). Therefore, the overall accuracy was 5 m horizontal and 0.2 m vertical.

Depth grids created from bathymetric survey data were processed using CARIS to a horizontal resolution of 2-5 m. The gridded data were exported as ASCII files and imported into ArcInfo software for processing and image production. Backscatter intensities were processed into images at the resolution of the bathymetry. All these data are compiled and displayed for interpretation using the latest available ESRI ArcGIS software, primarily ArcMap. The data were displayed in their geographically correct location allowing an interpretive layer to be constructed as an overlay. The process utilizes editing features within ArcMap, beginning with the construction of polygons to delineate benthic features. A feature is an area with common characteristics that can be presented as a single potential habitat type. The boundaries and extents of these features were determined from the bathymetry (in the form of shaded relief imagery created from the bathymetry grids using ArcMap) and acoustic backscatter intensity imagery. Interpretations were made at a scale of 1:10,000 with the final printed maps produced at a 1:20,000 scale.

Acoustic backscatter intensities were used to identify substrate type and sedimentary textures on the seafloor. Sediment samples were collected from selected sites in areas of various backscatter intensities with grain size analyses mechanically determined using a RhoTap sieving machine. Grain size categories include: mud, muddy sand, sand, sandy gravel, and gravel. Generally, higher backscatter intensities represent larger grain sizes so larger grain clasts such as pebbles, cobbles, and small boulders were identified by high backscatter intensity and groundtruthed by drop-camera and ROV video observations.

Potential habitat types were classified and mapped as previously described (Greene et al. 1999, 2005, 2007). Area calculations for San Juan County, BRZs and mandatory reserves were determined using GIS software (ArcView version 9.0, ESRI Inc.) Rocky habitat maps (shapefiles) were overlaid with reserve boundaries. Areas (m^2) of reserve polygons and amount of rocky habitat within each were calculated using functions written in ArcGIS. Percent of rocky habitat contained in various areas was determined by the intersections of the area maps with a rocky habitat GIS layer

(shapefile) and dividing the rocky habitat contained in the area by the total rocky habitat in San Juan County.

Statistics

Fish population densities for each transect by species, site and year were compared between BRZs and reference sites using General Linear Model (version 11.5.1, SPSS). This test is robust regarding assumption of independence of samples gathered in a systematic random sampling design. Factors in the model included year (2001, 2002, 2006 or 2007), sitepair (each pair of BRZ and associated reference site), reserve (BRZ treatment or reference site control) and associated interactions (yearXsitepair, yearXreserve, sitepairXreserve and yearXsitepairXreserve). Length (TL, nearest cm) frequency distributions for each species were compared between the 2001-02 and 2006-07 time periods using Kologmorov-Smirnov two independent sample test in SPSS software.

Evenness of fishing pressure distribution was analyzed using chi-square goodness of fit (Zar 1984). The null hypothesis was that fishing effort was evenly distributed across the study area with no difference between reserves and reference sites. A p-value less than 0.05 rejected the null hypothesis.

Results

Fish count SCUBA surveys

In 2001, 2002, 2006 and 2007, we conducted 94, 94, 85 and 162 band transects, respectively. In 2001, 2002 and 2007, half the transects conducted were in BRZs and the other half in reference (non-reserve) sites. In 2006, 42 transects were in BRZs and 43 in reference sites.

Lingcod had no significant long-term trend of population densities in reserves increasing relative to reference sites. Overall, lingcod in the San Juan Islands decreased in abundance from 2001-02 to 2006-07 (year $p<0.0001$) with the same pattern observed in reserves as in references (Fig. 3). Significant spatial variation existed in lingcod population density within San Juan County (sitepair $p<0.0001$). There was a significant difference in length-frequency between BRZs and reference sites in 2001-02 (BRZ n=96 and ref n=88, $p<0.001$), but not in 2006-07 (BRZ n=53 and ref n=30, $p=0.363$).

Copper rockfish abundance was greater in BRZs than reference sites ($p=0.019$) but the increased difference seen in 2006 was not present in 2007 (Fig. 4). Geographic variation in abundance existed ($p=0.049$) and differences between reserves and references varied by sitepair ($p=0.022$). Copper rockfish were larger in BRZs versus reference sites in 2001-02 (BRZ n=209 and ref n=142, $p=0.045$), but not in 2006-07 (BRZ n=251 and ref n=140, $p=0.346$).

Kelp greenling density showed no reserve effects with significant spatial variation between site pairs ($p<0.001$) suggesting geographic differences in fish density throughout the study area (Fig. 5). Kelp greenling length-frequency was greater in BRZs during 2001-02 (BRZ n=181 and ref n=150, $p<0.001$) and 2006-07 (BRZ n=201 and ref n=173, $p=0.032$). However, the difference diminished overtime, with mean size of BRZ fish increasing 49 mm (34.43 cm to 34.92 cm) while the mean size of reference-site fish increased 86 mm (32.42 cm to 33.28 cm) from 2001-02 to 2006-07.

Black rockfish showed no significant differences in population density (all p's>0.05) with length-frequency distribution greater in BRZs than reference sites in 2006-07 (BRZ n=88 and ref n=51, p =0.047) (Fig. 6). Black rockfish were not observed in reference sites during the 2001-02 time period (BRZ n=24 and ref n=0).

Habitat mapping and evaluation

Of the 1,152,622,903 m^2 covered by marine waters in San Juan County, the seabed under 948,740,007 m^2, or 82% have been mapped (Table 1). The BRZs ranged in size from 0.3 to 1.8 km^2, and the three mandatory reserves pertinent to bottomfish from 0.5 to 1.5 km^2. Although there was overlap in the size range of BRZs and mandatory reserves, on average the BRZs were smaller (mean size 0.7 km^2) than mandatory reserves (mean size 1.2 km^2). The amount of preferred rocky habitat (fractured bedrock and rock piles) in San Juan County totaled 70,309,249 m^2, or 7% of the total mapped area. The proportions of rocky habitat in BRZs ranged from 11% to 74% and from 31% to 37% in mandatory reserves (Table 1). In total, the mandatory reserves occupied 0.32% of San Juan County's marine area, while BRZs covered 0.50%. When viewed in light of suitable habitat for bottomfish, mandatory reserves occupied 1.6% of the preferred rocky habitat that has been mapped, while BRZs occupied 2.4%.

Fishing effort

Bottomfishing effort was observed on 38 out of 46 days between May 1st and June 15th, 2003. Effort was evenly distributed between voluntary BRZs and reference sites (p=0.5465). The one mandatory reserve studied had significantly less fishing effort than its reference site (p<0.0001). During 60 dives (half in BRZs and half in references), boats were observed fishing in BRZs 3 times and also in reference sites on 3 occasions. Divers found bottomfish jigs (terminal tackle) twice in BRZs and twice in reference sites. In addition, numerous citizens reported the existence of fishing pressure in BRZs as well as in mandatory reserves.

Discussion

Fish populations in the voluntary reserves were dynamic. Yet, they showed no consistent increasing trends for the five target species compared to reference sites. For example, lingcod and copper rockfish had greater densities in BRZs during 2006, but not in 2007. Kelp greenling were larger in reserves but the difference in mean length became less overtime rather than more. Target species in voluntary reserves did not become consistently and increasingly larger or occur in greater densities relative to reference sites. Fish population densities and length-frequency distributions did change between years and between sites, but not in a consistent manner or between all BRZ / reference site pairs that would indicate a beneficial reserve effect.

Insufficient time was not likely the cause for lack of reserve effect. Studies on mandatory reserves in San Juan County demonstrate positive reserve effects after 8-10 years (Palsson & Pacunski 1995; Palsson, 1998; Eisenhardt 2001), suggesting that after 10 years one would expect to see reserve effects in BRZs when compared to fished reference sites. This study did not account for the possible, but unlikely, scenario in which the marine environment of the ten-year period the BRZs have been in effect (1997-

2008) was somehow different and not as conducive to bottomfish productivity as the ten-year period that evidenced positive reserve effects in mandatory reserves (1990-2001). Simultaneous studies of both voluntary and mandatory reserves would eliminate this unlikely scenario. Finally, fishing seasons and regulations have become more restrictive during the later ten-year period, which would also become moot with simultaneous studies.

Poor habitat was not the reason that voluntary BRZs failed to show a beneficial reserve effect overtime. Data collected during SCUBA surveys also supported the community-based selection process's ability to locate BRZs in suitable bottomfish habitat. Based on recently constructed marine benthic habitat maps (Tilden 2004) half the BRZs had over 40% rocky habitat (and two >70%), while the three comparable mandatory reserves had 31-37% rocky habitat. Mandatory reserves with less suitable habitat show beneficial reserve effects. Voluntary reserves failed to demonstrate these effects on the same target species given similar time since reserve formation.

Compliance issues with voluntary reserves were evident and non-compliance with voluntary marine reserves was likely a major factor reducing BRZ efficacy in producing larger and denser fish populations. Fishing within BRZs was identified in the focused study of fishing pressure and was not in the mandatory reserve studied. Boats actively fishing were sighted in BRZs during SCUBA surveys and terminal tackle used to target bottomfish was recovered by divers in BRZs. Despite outreach and educational efforts, numerous private citizens reported seeing bottomfishing activity inside BRZs. While some people likely fished in BRZs unknowingly, anecdotal evidence also suggests that some anglers targeted BRZs. For example, a long-time clerk at a local grocery store spoke of visiting fishermen specifically asking for the BRZ outreach brochure to use as a map of places to fish. While the study on fishing pressure failed to detect people fishing in one mandatory reserve included in the study, people interviewed reported occasionally seeing people fishing in mandatory reserves but not as often as in BRZs.

In conjunction with non-compliance, reserve size seemed to be a contributing factor reducing BRZ efficacy. Two of San Juan County's mandatory reserves (1.58 km^2 and 1.55 km^2) exhibit beneficial reserve effects (Palsson and Pacunski 1995; Palsson 1998; Eisenhardt 2001), as has a 2.16 km^2 mandatory reserve protecting a similar suite of fish off La Jolla, California (Parnell et al. 2005). While the two larger BRZs were similarly sized (approximately 1.8 km^2), the other six BRZs were smaller (less than 0.6 km^2). Smaller reserve size my have increased the relative impact of fishing within a reserve. Additionally, fishing at the edge of the reserve would have had greater impact on smaller reserves, especially if the home range of target fish species was close to or greater than the size of the reserve.

Acoustic telemetry work conducted in or near BRZs suggests that the home ranges of lingcod (Griffin 2000; Rudd 2006) and kelp greenling (Perez 2005) are larger than BRZs. In addition, copper rockfish home range is similar to the size of most BRZs (Matthews 1990a, 1990b; Eisenhardt 2003). At a minimum, reserves need to encompass the home range of the species for which it is designed to protect and it was questionable if many of the BRZs do this. Increasing the size of BRZs would also decrease the impact of illegal or non-compliant fishing, decrease the impact of fishing at the edge of the reserves and increase the probability that fish within a reserve would remain in reserves.

Increasingly, marine resource managers and scientists are aware of the importance of community involvement for effective resource conservation and sustainability (Gunderson 2008). The San Juan County Marine Resources Committee recognized this at the time that BRZs were created and consequently spent substantial time and money educating the public about the voluntary nature of the BRZs as well as the long-term benefits of the BRZs to the community. However, we saw that we could not expect an education and outreach effort to sway an entire target population. This realization, combined with the marginal size of the BRZs relative to the home range of the target fish, likely resulted in reduced long-term efficacy of these reserves. Effective mandatory reserves of a given size appeared to need to be several times larger if voluntary.

The relationship of reserve efficacy relative to size was not independent of regulatory nature. While studies suggest that enforcement can be more important than community involvement (Byers 2007), it was clear from data in San Juan County that jurisdictions attempting to use voluntary reserves need to account for less than 100% compliance and plan reserve size accordingly. The availability of appropriate habitat was not a limiting factor in reserve design. Appropriate habitat is available in San Juan County to expand BRZs. Expanding voluntary reserve size, or transforming voluntary BRZs into mandatory reserves or some combination of the two should be considered for increasing the impact on recovering bottomfish species.

This study of San Juan County's voluntary reserves reiterates the need for monitoring and adaptive management (Mills & Rawson 2004; Sato & Wylie-Echeverria 2004). If the study had been conducted over fewer years, inter-annual variation in abundance and size could have led to results suggesting voluntary reserves were having a positive effect. It was only because surveys were conducted over seven years that we can conclude no long-term reserve benefit exists. While increased funding would have permitted more intensive SCUBA surveys and better evaluation of fishing pressure, the monitoring that was conducted is sufficient to determine that voluntary reserves failed to be any more effective than reference site controls in recovering bottomfish.

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Literature Cited

Beaudreau, A. H., and T. E. Essington. 2007. Spatial, Temporal, and Ontogenetic Patterns of Predation on Rockfishes by Lingcod. Transactions of the American Fisheries Society **136**: 1438-1452.

Berkeley, S. A., M. A. Hixon, R. J. Larson and M. S. Love. 2004a. Fisheries Sustainability via Protection of Age Structure and Spatial Distribution of Fish Populations. Fisheries **29**: 23-32.

Berkeley, S. A., Chapman, C., and Sogard S. 2004b. Maternal age as a determinant of larval growth and survival in a marine fish, *Sebastes melanops*. Ecology **85**: 1258-1264

Byers, J. E. and E. G. Noonburg. 2007. Poaching, enforcement, and the efficacy of marine reserves. Ecological Applications **17:** 851–1856

Crawford B., M. Kasmidi, F. Korompis and R. B. Pollnac. 2008. Factors Influencing Progress in Establishing Community-Based Marine Protected Areas in Indonesia. Coastal Management **34**: 39-64.

Davis, B. 2003. Bottomfish Recovery Zone Fishing Pressure Assessment. Report to the San Juan County Marine Resources Committee, 10pp.

Eisenhardt, E.P. 2001. Effect of the San Juan Islands Marine Preserves on demographic patterns of nearshore rocky reef fish. M.S. Thesis. School of Aquatic and Fishery Sciences, University of Washington, Seattle, Washington. 272pp.

Eisenhardt, E.P. 2003. 2002 Acoustic telemetry project final report to the San Juan County Bottomfish Recovery Program. San Juan County Marine Resources Committee, Friday Harbor, Washington. 29p.

Gell, F. R. and C. M. Roberts. 2003. Benefits beyond boundaries: the fishery effects of marine reserves. Trends in Ecology and Evolution **18**: 448-455.

Greene, H. G., Yoklovich, M. M., Starr, R. M., O'Connell, V. M., Wakefield, W. W., Sullivan, D. E., McRea Jr., J. E., and Cailiet, G. M., 1999. A classification scheme for deep seafloor habitats. Oceanologica Acta **22**:663-678.

Greene, H. G., Bizzarro, J. J., Tilden, J. E., Lopez, H. L., and Erdey, M. D, 2005. The benefits and pitfalls of geographic information systems in marine benthic habitat mapping. In Wright, D. J., and Scholz, A. J., eds., Place Matters Geospatial Tools for Marine Science, Conservation, and Marine Management in the Pacific Northwest: Oregon State University Press, Corvalis, OR, p. 34-46.

Greene, H. G., Bizzarro, J. J., O'Connell, V. M., and Brylinsky, C. K., 2007. Construction of digital potential marine benthic habitat maps using a coded classification scheme and its applications. In Todd, B. J., and Greene, H. G., Mapping the Seafloor for Habitat Characterization: Geological Association of Canada, Special Paper 47, p. 141-155.

Griffin, M. 2000. Evaluation of acoustic telemetry and visible implant fluorescent elastomer as tracking tools of *Ophiodon elongatus* within a San Juan County "no-take" reserve. Fish biology class reports, University of Washington, Friday Harbor Laboratories.

Gunderson, D. R., A. M. Parma, R. Hilborn, J. M. Cope, D. L. Fluharty, M. L. Miller, R. D. Vetter, S. S. Heppell, and H. G. Greene. 2008. The Challenge of Managing Nearshore Rocky Reef Resources. Fisheries **33**:172-179.

Hahn A. 2007. Mr. Tides 3, Version 3.0 (Release 16). Hahn Software.

Halpern, B. S., and R. Warner. 2003. The impact of marine reserves: Do reserves work and does size matter? *Ecological Applications* **13**:117–137.

Hilborn, R., K. Stokes, J-J. Maguire, T. Smith. L. W. Botsford, M. Mangel, J. Orensanz, A. Parma, J. Rice, J. Bell, K. L. Cochrane, S. Garcia, S. J. Hall, G. P. Kirkwood, K. Sainsbury, G. Stefansson, and C. Walters. 2004. When can marine reserves improve fisheries management? Ocean & Coastal Management **47**: 197-205.

Horwich R. H., and J. Lyon. 2007. Community conservation: practitioners' answer to critics. Oryx **41**: 376-385.

International Hydrographic Organization, 1998. IHO standards for hydrographic surveys. International Hydrographic Bureau, Monaco, International Hydrographic Organization Special Publication no. 44.

Kaill, W. M. 2001. Bottomfish Recovery Project Final Report 2000. San Juan County Bottomfish Recovery Program. San Juan County Marine Resources Committee, Friday Harbor, Washington. 85p.

Koski, K. 2001. Bottomfish Recovery Project Coordination Final Report 2001. San Juan County Bottomfish Recovery Program. San Juan County Marine Resources Committee, Friday Harbor, Washington. 43p.

Lea, R. N., R. D. McAllister and D. A. Ventresca. 1999. Biological Aspects of Nearshore Rockfishes of the Genus Sebastes from Central California With Notes On Ecologically Related Sport Fishes. California Fish and Game Fish Bulletin **177**:1-112.

Lundquist, C. J. and E. F. Granek. 2005. Strategies for Successful Marine Conservation: Integrating Socioeconomic, Political, and Scientific Factors. Conservation Biology **19**: 1771–1778.

Martell, S. and S. S. Wallace. 2000. The Use of Marine Protected Areas for the Conservation of Lingcod. Bulletin of Marine Science **66:**957-990.

Matthews, K. 1990a. An experimental study of the habitat preference and movement patterns of copper, quillback, and brown rockfishes (*Sebastes* spp.). Environmental Biology of Fishes **29:**161-178.

Matthews, K. 1990b. A telemetric study of the home ranges and homing routes of copper and quillback rockfishes on shallow rocky reefs. Canadian Journal of Zoology **68:**2243-2250.

Mills, C. E. and K. Rawson. 2004. Outlook grim for North Pacific Rockfish: Rockfish Symposium, Friday Harbor Laboratories, University of Washington, USA, September 25–26, 2003. Fish and Fisheries **5**:178-180.

Moulton, L. L. 1977. An ecological analysis of fishes inhabiting the rocky near shore regions of northern Puget Sound, Washington. Ph.D. Dissertation, School of Fisheries, University of Washington, Seattle, Washington. 181 pp.

Musick, J. A., M. M. Harbin, S. A. Berkeley, G. H. Burgess, A. M. Eklund, L. Findley, R. G. Gilmore, J. T. Golden, D. S. Ha, G. R. Huntsman. 2001. Marine, Estuarine, and Diadromous Fish Stocks at Risk of Extinction in North America (Exclusive of Pacific Salmonids). Fisheries **25:**6-30.

Pacunski, R. and W. Palsson. 2001. Macro- and Micro-habitat Relationships of Adult and

Sub-Adult Rockfish, Lingcod, and Kelp Greenling in Puget Sound. Proceedings of the 2001 Puget Sound Research Conference. Puget Sound Action Team, Seattle, Washington.

Paddack, M. J., and J. A. Estes. 2000. Kelp forest fish populations in marine reserves and adjacent exploited areas of central California. Ecological Applications **10**:855–870.

Palsson, W. A., and R. E. Pacunski. 1995. The response of rocky reef fishes to harvest refugia in Puget Sound. In: Puget Sound Research '95, Vol. 1, pages 224-234. Puget Sound Water Quality Authority, Olympia, WA.

Palsson, W.A. 1998. Monitoring the response of rockfish to protected areas. In: Marine harvest refugia for West Coast rockfish: A workshop. NOAA Technical Memorandum NMFS. NOAA-TM-NMFSSWFSC-**255:**64-73.

Parker, S. J., S. A. Berkeley, J. T. Golden, D. R. Gunderson, J. Heifetz, M. A. Hixon, B. M. Leaman, R. Larson, M. S. Love, J. A. Musick, V. M. O'Connell, S. Ralston, H. J. Weeks, and M. M. Yoklavich. 2000. Management of Pacific rockfish. Fisheries **25(3)**:22–29.

Parnell, P. E., C. E. Lennert-Cody, L. Geelen, L. D. Stanley, and P. K. Dayton. 2005. Effectiveness of a small marine reserve in southern California. Marine Ecology Progress Series **296**: 39–52.

Perez, K. 2005. Movement patterns of kelp greenling (*Hexagrammus decagrammus*) around Friday Harbor. An unpublished class project. Fish biology 1991. University of Washington, Friday Harbor Laboratories.

Puget Sound Action Team. 2007. 2007 Puget Sound Update: Ninth Report of the Puget Sound Ambient Monitoring Program. Puget Sound Action Team. Olympia, Washington.

Roberts, C. M., J. A. Bohnsack, F. Gell, J. P. Hawkins, and R. Goodridge. 2001. Effects of marine reserves on adjacent fisheries. Science **294:**1920–1923.

Rudd, C. 2006. Using Acoustic Telemetry to Investigate the Movement Patterns of Male Sub-adult Lingcod (*Ophiodon elongatus*) in a Marine Preserve. Fish biology class reports, University of Washington, Friday Harbor Laboratories.

Sato, M., and T. Wylie-Echerrvia. 2004. Best science and best management for rockfish and lingcod in San Juan County. Report to the San Juan County Marine Resources Committee, Friday Harbor, Washington.

Stout, H. A., B. B. McCain, R. D. Vetter, T. L. Builder, W. H. Lenarz, L. L. Johnson, and R. D. Methot. 2001. Status review of copper rockfish (*Sebastes caurinus*), quillback rockfish (*S.maliger*), and brown rockfish (*S. auriculatus*) in Puget Sound, Washington. NOAA Technical Memorandum NMFS-NWFSC-46, 158 pp.

Tilden, J. E., 2004. Marine geology and potential rockfish habitat in the southwestern San Juan Islands, Washington. Masters of Science Thesis, Moss Landing Marine Laboratories, Moss Landing, 121 p.

West, J. 1997. Protection and Restoration of Marine Life in the Inland Waters of Washington State. Puget Sound Georgia Basin Environmental Report Series: Number 6. Puget Sound Action Team. Olympia, Washington.

Zar, J.H. 1984. Biostatistical Analysis, 2nd Edition. Prentice Hall, Englewood Cliffs, New Jersey.

Table 1. Areas of bottomfish reserves in San Juan County and proportions of rocky habitat. Data are square meters.

		total area	% of County	area mapped	% mapped	rocky area	% rocky of mapped
SJC marine waters		1,152,622,903	100%	948,740,007	82%	70,309,249	7%
BRZ1	Point Lawrence	430,356	0.037%	335,369	78%	103,702	31%
BRZ2	Kellet Bluff	580,103	0.050%	461,492	80%	327,807	71%
BRZ3	Lime Kiln	475,217	0.041%	291,857	61%	216,156	74%
BRZ4	Pile Point	276,308	0.024%	243,269	88%	125,488	52%
BRZ5	Bell Island	106,216	0.0092%	90,849	86%	37,110	41%
BRZ6	Charles Island	321,431	0.028%	233,267	73%	66,650	29%
BRZ7	Flattop Island	1,734,011	0.15%	1,687,136	97%	568,546	34%
BRZ8	Bare Island	1,888,826	0.16%	1,820,135	96%	208,179	11%
Man1	Shaw Island	1,578,745	0.14%	1,393,013	88%	510,386	37%
Man2	Point Caution	1,547,294	0.13%	1,449,625	94%	520,289	36%
Man3	Yellow/Low Island	508,362	0.044%	338,316	67%	103,975	31%
Man4	False Bay	1,486,458	0.13%	124,153	8%	16,229	13%
Man5	Argyle Lagoon	42,157	0.0037%	0	0%	0	0%

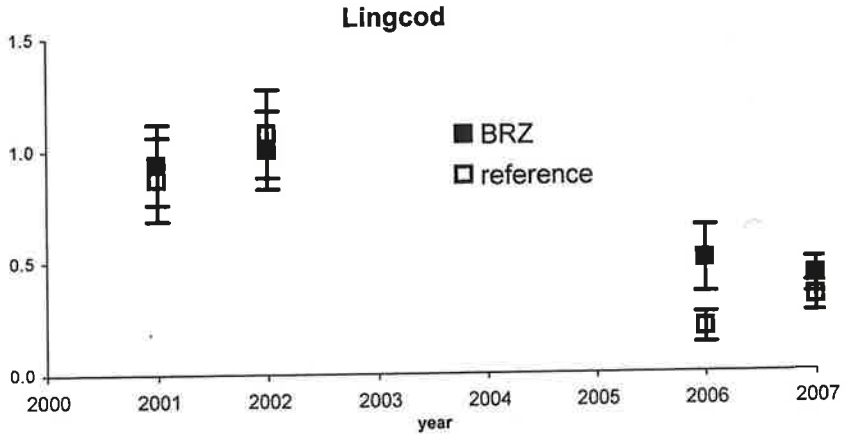
Figure headings

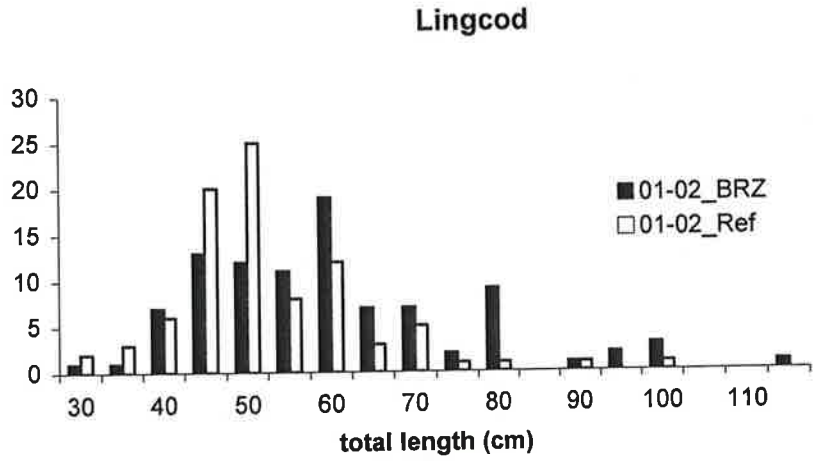
Figure 1: Map of San Juan County, Washington (USA), including rocky habitat, voluntary reserves, reference fished-areas and mandatory no-take reserves. Dashed line represents the boundary of San Juan County.
Figure 2: Fishing effort survey (Davis 2003).
Figure 3: Lingcod population densities and length-frequency distributions in BRZs and associated reference sites overtime.
Figure 4: Copper rockfish population densities and length-frequency distributions in BRZs and associated reference sites overtime.
Figure 5: Kelp greenling population densities and length-frequency distributions in BRZs and associated reference sites overtime.
Figure 6: Black rockfish population densities and length-frequency distributions in BRZs and associated reference sites overtime.

Figure 1.

Figure 2

Figure 3


Lingcod
1.5
1.0
0.5
0.0
BRZ
reference
2000
2001
2002
2003
2004
2005
2006
2007
year


Lingcod
30
25
20
15
10
5
0
01-02_BRZ
01-02_Ref
30
40
50
60
70
80
90
100
110
total length (cm)

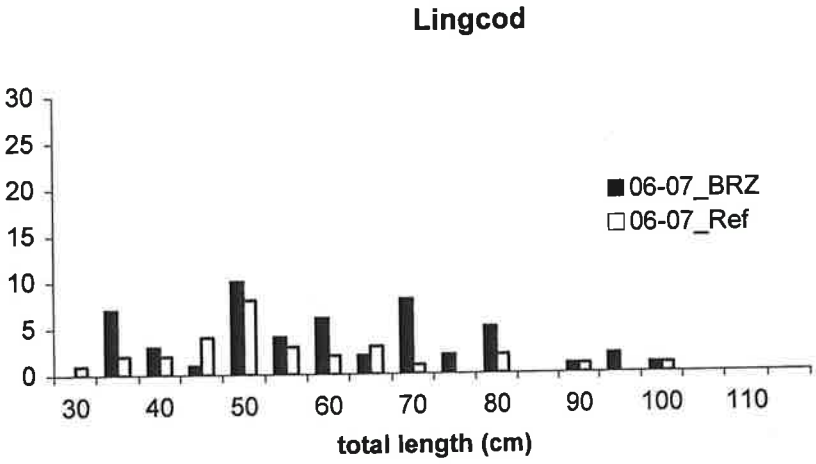

Lingcod
30
25
20
15
10
5
0
06-07_BRZ
06-07_Ref
30
40
50
60
70
80
90
100
110
total length (cm)

Figure 4

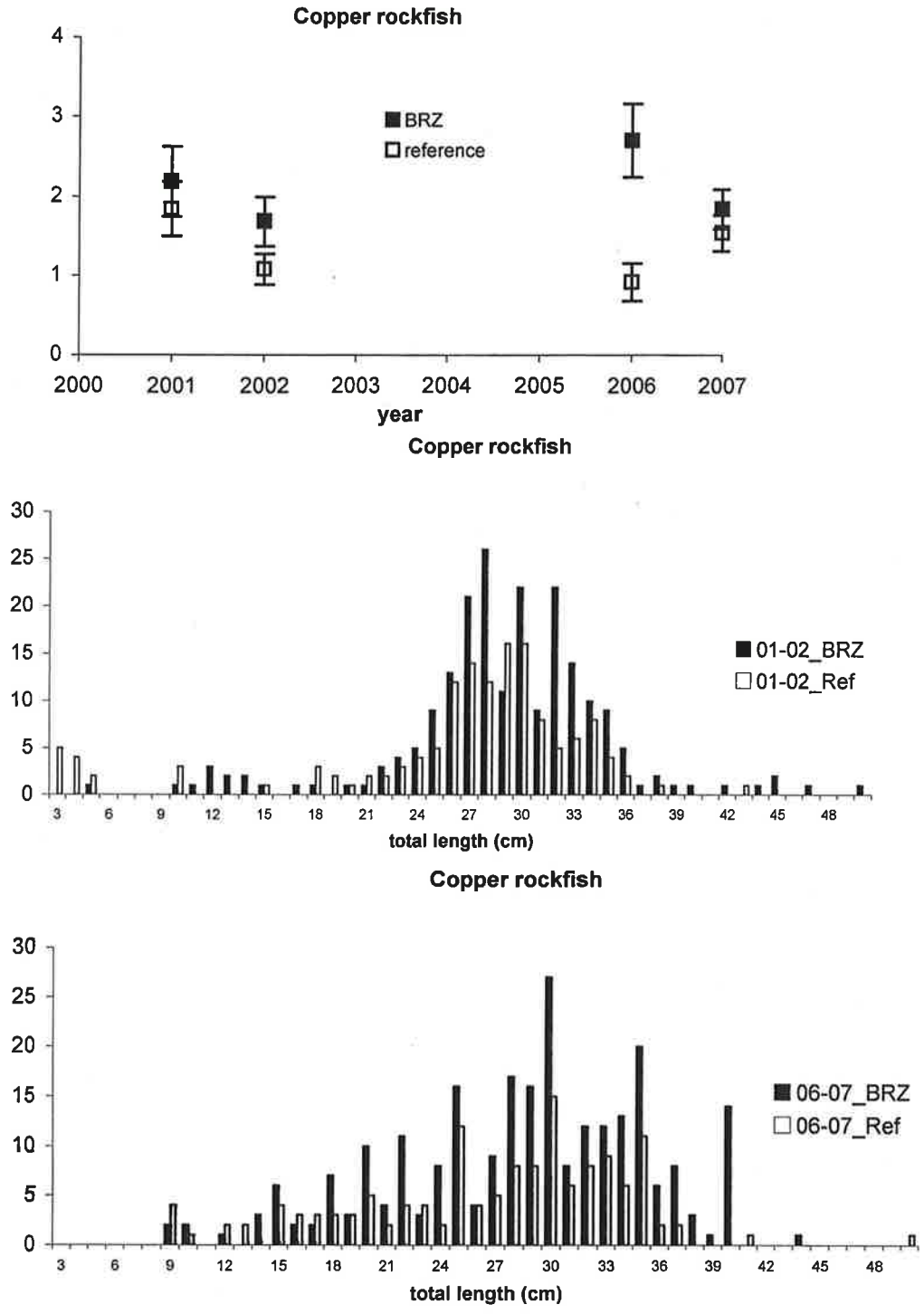

Copper rockfish
BRZ
reference
year
Copper rockfish
01-02_BRZ
01-02_Ref
total length (cm)
Copper rockfish
06-07_BRZ
06-07_Ref
total length (cm)

Figure 5

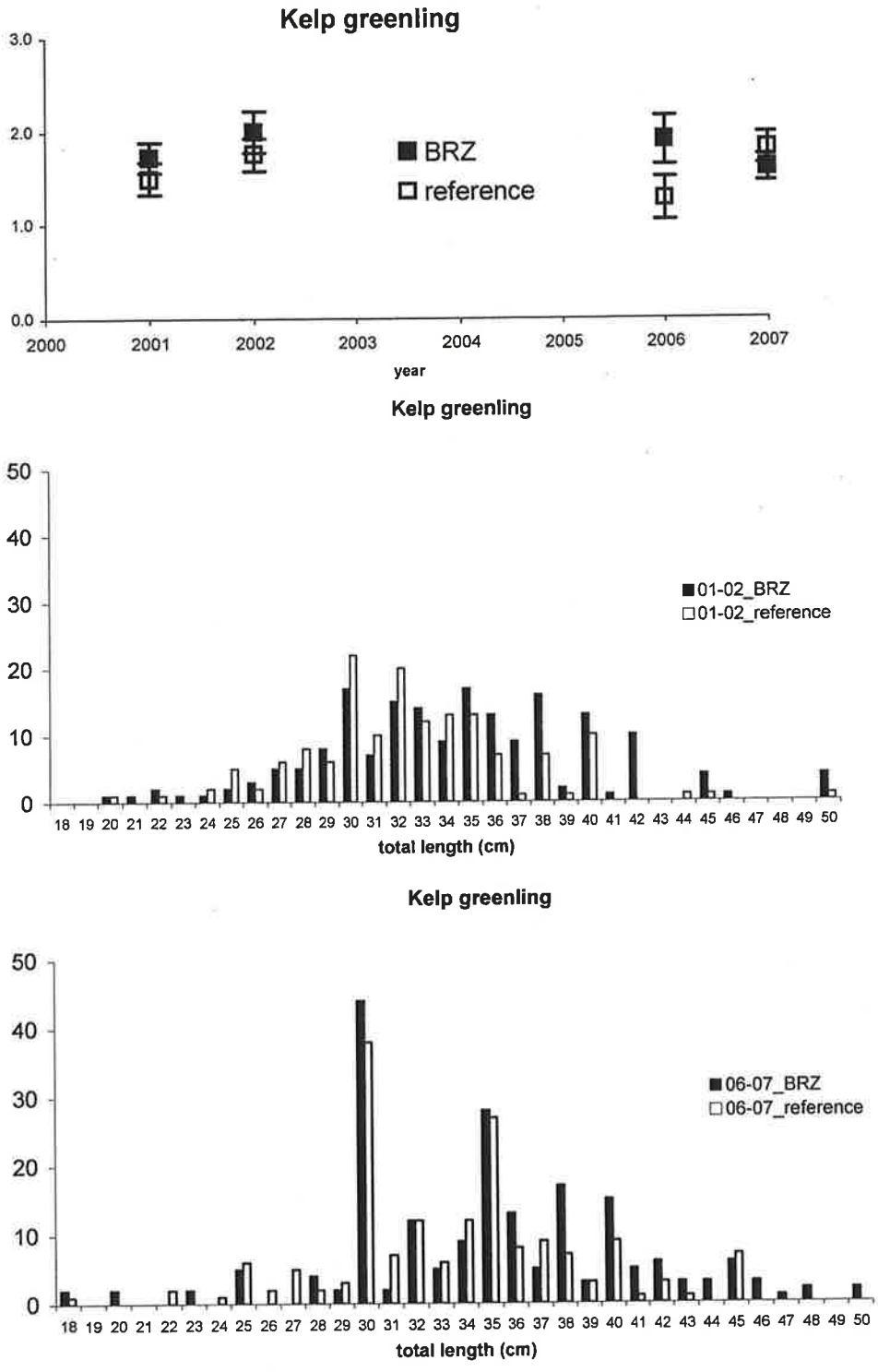
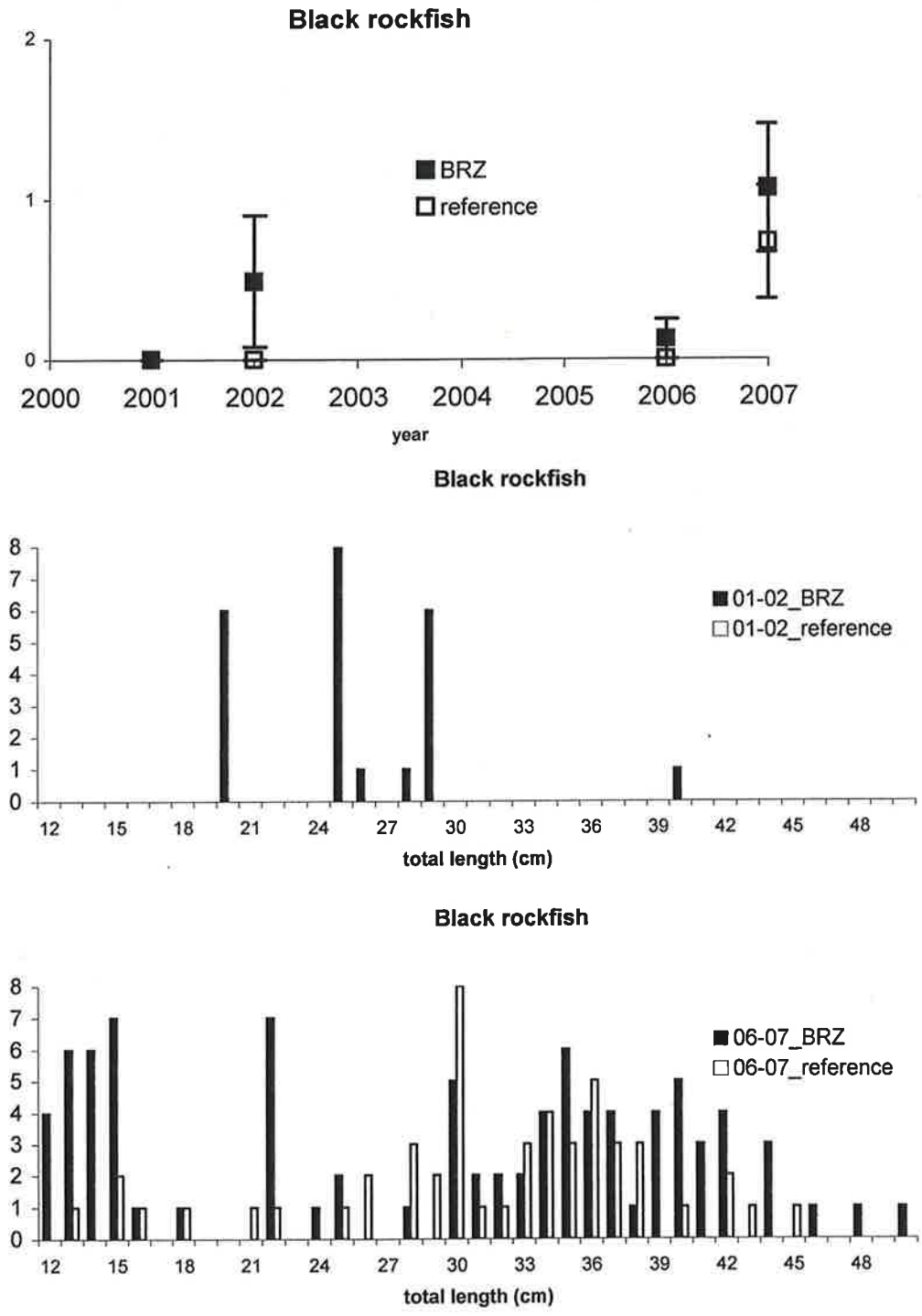

Kelp greenling
3.0
2.0
1.0
0.0
BRZ
reference
2000
2001
2002
2003
2004
2005
2006
2007
year
Kelp greenling
50
40
30
20
10
0
01-02_BRZ
01-02_reference
18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50
total length (cm)
Kelp greenling
50
40
30
20
10
0
06-07_BRZ
06-07_reference
18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50
total length (cm)

Figure 6.


Black rockfish
2
1
0
BRZ
reference
2000
2001
2002
2003
2004
2005
2006
2007
year
Black rockfish
01-02_BRZ
01-02_reference
12
15
18
21
24
27
30
33
36
39
42
45
48
total length (cm)
Black rockfish
06-07_BRZ
06-07_reference
total length (cm)

Title: Efficacy of voluntary marine reserves for recovering bottomfish

RH: Efficacy of voluntary marine reserves

Key Words: voluntary, no-fishing areas, marine protected area, marine reserve, habitat, lingcod, rockfish, *Sebastes* spp.
Word Count: 5,975

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Abstract: In 1997, San Juan County, Washington (USA) created eight voluntary marine reserves to promote recovery of demersal fish, or bottomfish. Using SCUBA band-transects, divers collected data on population density and fish length-distribution of four bottomfish species in pairs of voluntary marine reserves and reference control sites in 2001, 2002, 2006 and 2007. We used these data along with benthic habitat maps and fishing effort observations to evaluate voluntary marine reserve efficacy, physical size, habitat, and fishing pressure relative to reference sites. We also compared these results to those from nearby mandatory reserves, which have shown beneficial reserve effects over similar time periods. Voluntary marine reserves showed no consistently different trends for four target bottomfish species compared to reference sites. Selection of appropriate habitat and insufficient time since reserve establishment were not likely causes for lack of voluntary reserve effect. Instead, poor volunteer compliance combined with limited reserve size contributed to ineffective voluntary marine reserves. The relationship between reserve efficacy and reserve size appears not to be independent of regulatory nature. Jurisdictions attempting to use voluntary reserves need to account for less than 100% compliance and plan reserve size accordingly.

Introduction

Effective marine reserves, also called no-fishing zones, no-take areas and marine protected areas (MPAs), can be associated with greater population densities, biomass, diversity of fish species, and larger individual size-distributions, as well as provide "spillover" benefits beyond the reserve boundaries (Roberts et al. 2001; Gell & Roberts 2003; Halpern & Warner 2003). Consequently, there is great interest in using marine reserves as a tool to recover declining fish stocks (Parker et al. 2000), especially for demersal species with small home ranges and high site fidelity such as many rockfish (*Sebastes* spp.) and other bottomfish (Lea et al. 1999).

In Northeastern Pacific temperate waters, marine reserves can increase the density, size and spawning biomass of lingcod (*Ophiodon elongatus*) and some rockfish species (Palsson & Pacunski 1995; Palsson 1998; Eisenhardt 2001; Berkeley et al. 2004a; Parnell et al. 2005). Additionally, reserves protect older, larger females which have been shown to have greater fecundity relative to mass and increased growth and survival of offspring (Berkeley et al. 2004b). Overfishing has led to rockfish and lingcod population declines in the inland marine waters of Washington State (West 1997) and rockfish stocks throughout the region have been described as at risk (Puget Sound Action Team, 2007). Despite reductions in daily catch limits and season length designed to protect and recover populations, these fish are still considered vulnerable to overexploitation (Stout et al. 2001; Musick et al. 2001; Mills & Rawson 2004).

In 1997, the San Juan County Marine Resources Committee (San Juan County, Washington State, USA), a volunteer body that advises the elected County Council on marine issues, was concerned about bottomfish declines and elected to institute a local "bottom-up" approach to aid state management recovery efforts. In Washington State, the Department of Fish and Wildlife and 19 tribes with usual and accustom fishing areas co-manage harvest of marine species (Rafeedie decision 873 F. Supp. 1422; 1994 U.S. District Court) and have jurisdiction for creating legally binding, mandatory marine reserves. In 1990, they created the San Juan Islands Marine Preserves, a system of mandatory marine reserves bordering terrestrial uplands owned by the University of Washington. Three of these reserves (Point Caution, Shaw Island, Yellow and Low Islands) encompassed rocky habitat. These three mandatory reserves have shown positive reserve effects compared to fished reference sites, including increased population density and greater length-frequency distribution of bottomfish species such as lingcod and rockfish (Palsson & Pacunski 1995; Palsson 1998; Eisenhardt 2001; Beaudreau & Essington 2007). Having no regulatory authority but encouraged by the results observed in mandatory reserves, the Marine Resource Committee created voluntary marine reserves. Community-based conservation and community-supported voluntary protected areas have been touted as an effective alternative to top-down centralized approaches to conservation (Horwich & Lyon 2007; Crawford et al. 2008), however voluntary marine reserves had never been previously attempted and scientifically evaluated in the Northeast Pacific.

At a series of public meetings, citizens identified zones that were once productive fishing areas for bottomfish but were now considered fished-out (Kaill 2001). This resulted in eight Bottomfish Recovery Zones (BRZs: voluntary marine reserves) where people were asked to voluntarily discontinue fishing for bottomfish (Fig. 1). Salmon (*Oncorhynchus* spp.) fishing was permitted, but people were specifically asked not to fish

for rockfish, lingcod, kelp greenling (*Hexagrammos decagrammus*), and cabezon (*Scorpaenichthys marmoratus*).

Since inception, it was recognized that the success of the voluntary BRZs would depend on intensive outreach and education efforts to inform the public about the potential benefits of marine reserves (Koski 2001). San Juan County, which has a land area of 1,609 km^2, is composed entirely of islands and has a relatively small number of residents (15,298 people in 2006; http://quickfacts.census.gov). However, it is estimated that visitors, many of whom come to fish, nearly double the population during certain times of the year and that the fishing pressure is significantly greater than one would expect based on the resident population alone. When voluntary reserves were established for bottomfish, the Marine Resources Committee actively worked to educate the local population and visitors that came to the region to fish. Thousands of color brochures were printed and distributed around the County, including at marinas, to boaters on the water, and other areas frequented by visiting recreational fishermen. In addition, posters were created and educational lectures were given to community groups on the larger islands. A full-page color advertisement was placed in the annual Washington State Department of Fish and Wildlife fishing regulation bulletin explaining the voluntary marine reserve concept along with a map identifying BRZ locations. These education and outreach efforts were continued for almost a decade. During some years this effort also included partially funding a boater education program that would visit BRZs and communicate with people found to be fishing within the voluntary zones.

The efficacy of marine reserves needs to be evaluated on a case-by-case basis to provide insight into how this fishery management tool can be most effectively used (Hilborn et al. 2004; Lundquist & Graenek 2005). After almost a decade of existence, we evaluate the effectiveness of San Juan County's voluntary BRZs for recovering target fish species. Additionally, we compared reserve efficacy, physical size, habitat, and fishing pressure with mandatory reserves in the area.

Methods

Fish count SCUBA surveys

Four observers on SCUBA completed visual band transects following a slightly modified protocol based on earlier work (Eisenhardt 2001). All dives were conducted in August or September to control for seasonal variation. Once observers entered the water, they descended to the seafloor and proceeded via the most direct route 1 m off the bottom to a depth of 20 m. The primary observer was tethered to a 25 m fiberglass measuring tape. While staying 1 m above the substrate, the primary observer pair moved across the seafloor at approximately 50 cm/s. The secondary diver pair remained stationary and held onto the tape reel as it unwound. For each fish encountered within a 2 m-radius sphere centered on the primary diver, the depth, species, and total length (to nearest cm) were recorded. Fish that swam off or through the transect as the primary observer approached were counted, the assumption being the observer's presence caused the fish to move. If possible, total fish length was determined by placing a measuring device (Paddack & Estes 2000) next to or below the lateral line of the fish, or by measuring the distance between two points on the substrate corresponding to points below the tip of the lower jaw and below the posterior portion of the ventral caudal fin ray (Martell & Wallace

2000). If the observer could not measure the fish, length was estimated. Target species included two rockfish: copper (*S. caurinus*) and black (*S. melanops),* as well as lingcod and kelp greenling.

Divers surveyed up to eight transects per dive using a systematic random sampling design. Data collection efforts focused in 15 – 20 m depths where densities of target species are typically greatest (Moulton 1977). The first three transects surveyed a constant depth of 20 m, the fourth started at 20 m and ended at 16 m, and subsequent transects continued to start 4 m deeper than they ended. The general linear model used for calculating population density statistics and discussed later is robust in regard to assumption of independence of samples.

Fish were counted in seven voluntary marine reserves (BRZs): Bare Island, Bell Island, Charles Island, Flattop Island, Kellet Bluff, Lime Kiln, and Pile Point (Fig. 1). Each voluntary BRZ was paired with a reference site that had similar habitat and was no more than 5 km from the associated BRZ. Specific habitat features considered in determining reference sites were bathymetry, general abundance of bottomfish, and total area. The Point Lawrence BRZ was not surveyed due to safety concerns regarding strong tidal down-wellings (Fig. 1). Human activity in the area, especially fishing, and its intensity were recorded before and after every dive.

Fishing effort

A single fishing pressure assessment of select BRZs with paired reference zones was conducted in 2003. Between 1 May and 15 June of that year (lingcod season), a motorized skiff was used to daily circumnavigate San Juan Island (Fig. 2). A random number generator determined the departure time of the observation vessel on each sampling day (8:00 a.m., 12:00 noon, or 4:00 p.m. local time). Seasonal closure of the recreational salmon fishery during sampling dates ensured no confusion regarding targeted catch of fishermen observed.

The sampling skiff was equipped with a Wide Area Augmentation System enabled Global Positioning System (GPS) with chart-plotting capability. The boundaries of mandatory and voluntary reserves and reference sites were entered into the GPS so that the observer could determine if a vessel was in these areas. Location of fishing activity observed was recorded. In addition, a 0.4 km adjacent zone was demarcated around each site to determine if fishermen were preferentially fishing adjacent to BRZs (Fig. 2). Accuracy was determined to be +/-50 m.

We collected anecdotal information on fishing activity in reserves numerous ways. We recorded fishing activity observed before and after all SCUBA surveys at BRZs and reference sites. We solicited marine water taxi operators, fishing guides, whale watch captains, and other local citizens who frequently passed BRZs while operating their business on the water. Many private citizens approached us with stories of people fishing in reserves.

Habitat mapping and evaluation

Fractured bedrock outcrops and areas of stacked boulders are considered optimal bottomfish habitat in the San Juan Archipelago (Pacunski & Palsson 2001). To distinguish marine benthic potential habitat types, acoustic multibeam echosounder (MBES) techniques were employed to map the seafloor in San Juan County. Habitat

maps were constructed using wide-swath digital MBES bathymetry and acoustic backscatter data and locally groundtruthed using sediment samples, video drop cameras and remotely operated vehicle video.

The MBES coverage was undertaken to obtain contiguous full seafloor coverage of the deeper water areas within the San Juan Archipelago. For areas >50 m water depth, a hull-mounted Kongsberg-Simrad EM1002 system, which operates at a frequency of 95 kHz utilizing 127 beams was used. For areas <50 m water depth a hull-mounted Kongsberg-Simrad EM3002 system, which operates at a frequency of 300 kHz utilizing 121-135 beams was used. In most of the areas, the tracks were positioned so as to insonify 100% of the seafloor with a 100% overlap, providing 200% coverage.

Positioning was accomplished using a broadcast Differential Global Positioning System (DGPS) and MBES data were corrected for sound speed variations in the stratified water column using frequent sound speed casts. The data were corrected for tides and then edited for spurious bathymetric and navigational points using CARIS software. Positioning using DGPS has a positional error of up to 5 m and vertical errors on the order of 1% water depth (International Hydrographic Organization, 1998). Therefore, the overall accuracy was 5 m horizontal and 0.2 m vertical.

Depth grids created from bathymetric survey data were processed using CARIS to a horizontal resolution of 2-5 m. The gridded data were exported as ASCII files and imported into ArcInfo software for processing and image production. Backscatter intensities were processed into images at the resolution of the bathymetry. All these data are compiled and displayed for interpretation using the latest available ESRI ArcGIS software, primarily ArcMap. The data were displayed in their geographically correct location allowing an interpretive layer to be constructed as an overlay. The process utilizes editing features within ArcMap, beginning with the construction of polygons to delineate benthic features. A feature is an area with common characteristics that can be presented as a single potential habitat type. The boundaries and extents of these features were determined from the bathymetry (in the form of shaded relief imagery created from the bathymetry grids using ArcMap) and acoustic backscatter intensity imagery. Interpretations were made at a scale of 1:10,000 with the final printed maps produced at a 1:20,000 scale.

Acoustic backscatter intensities were used to identify substrate type and sedimentary textures on the seafloor. Sediment samples were collected from selected sites in areas of various backscatter intensities with grain size analyses mechanically determined using a RhoTap sieving machine. Grain size categories include: mud, muddy sand, sand, sandy gravel, and gravel. Generally, higher backscatter intensities represent larger grain sizes so larger grain clasts such as pebbles, cobbles, and small boulders were identified by high backscatter intensity and groundtruthed by drop-camera and ROV video observations.

Potential habitat types were classified and mapped as previously described (Greene et al. 1999, 2005, 2007). Area calculations for San Juan County, BRZs and mandatory reserves were determined using GIS software (ArcView version 9.0, ESRI Inc.) Rocky habitat maps (shapefiles) were overlaid with reserve boundaries. Areas (m^2) of reserve polygons and amount of rocky habitat within each were calculated using functions written in ArcGIS. Percent of rocky habitat contained in various areas was determined by the intersections of the area maps with a rocky habitat GIS layer

(shapefile) and dividing the rocky habitat contained in the area by the total rocky habitat in San Juan County.

Statistics

Fish population densities for each transect by species, site and year were compared between BRZs and reference sites using General Linear Model (version 11.5.1, SPSS). This test is robust regarding assumption of independence of samples gathered in a systematic random sampling design. Factors in the model included year (2001, 2002, 2006 or 2007), sitepair (each pair of BRZ and associated reference site), reserve (BRZ treatment or reference site control) and associated interactions (yearXsitepair, yearXreserve, sitepairXreserve and yearXsitepairXreserve). Length (TL, nearest cm) frequency distributions for each species were compared between the 2001-02 and 2006-07 time periods using Kologmorov-Smirnov two independent sample test in SPSS software.

Evenness of fishing pressure distribution was analyzed using chi-square goodness of fit (Zar 1984). The null hypothesis was that fishing effort was evenly distributed across the study area with no difference between reserves and reference sites. A p-value less than 0.05 rejected the null hypothesis.

Results

Fish count SCUBA surveys

In 2001, 2002, 2006 and 2007, we conducted 94, 94, 85 and 162 band transects, respectively. In 2001, 2002 and 2007, half the transects conducted were in BRZs and the other half in reference (non-reserve) sites. In 2006, 42 transects were in BRZs and 43 in reference sites.

Lingcod had no significant long-term trend of population densities in reserves increasing relative to reference sites. Overall, lingcod in the San Juan Islands decreased in abundance from 2001-02 to 2006-07 (year $p<0.0001$) with the same pattern observed in reserves as in references (Fig. 3). Significant spatial variation existed in lingcod population density within San Juan County (sitepair $p<0.0001$). There was a significant difference in length-frequency between BRZs and reference sites in 2001-02 (BRZ n=96 and ref n=88, $p<0.001$), but not in 2006-07 (BRZ n=53 and ref n=30, $p=0.363$).

Copper rockfish abundance was greater in BRZs than reference sites ($p=0.019$) but the increased difference seen in 2006 was not present in 2007 (Fig. 4). Geographic variation in abundance existed ($p=0.049$) and differences between reserves and references varied by sitepair ($p=0.022$). Copper rockfish were larger in BRZs versus reference sites in 2001-02 (BRZ n=209 and ref n=142, $p=0.045$), but not in 2006-07 (BRZ n=251 and ref n=140, $p=0.346$).

Kelp greenling density showed no reserve effects with significant spatial variation between site pairs ($p<0.001$) suggesting geographic differences in fish density throughout the study area (Fig. 5). Kelp greenling length-frequency was greater in BRZs during 2001-02 (BRZ n=181 and ref n=150, $p<0.001$) and 2006-07 (BRZ n=201 and ref n=173, $p=0.032$). However, the difference diminished overtime, with mean size of BRZ fish increasing 49 mm (34.43 cm to 34.92 cm) while the mean size of reference-site fish increased 86 mm (32.42 cm to 33.28 cm) from 2001-02 to 2006-07.

Black rockfish showed no significant differences in population density (all p's>0.05) with length-frequency distribution greater in BRZs than reference sites in 2006-07 (BRZ n=88 and ref n=51, p =0.047) (Fig. 6). Black rockfish were not observed in reference sites during the 2001-02 time period (BRZ n=24 and ref n=0).

Habitat mapping and evaluation

Of the 1,152,622,903 m^2 covered by marine waters in San Juan County, the seabed under 948,740,007 m^2, or 82% have been mapped (Table 1). The BRZs ranged in size from 0.3 to 1.8 km^2, and the three mandatory reserves pertinent to bottomfish from 0.5 to 1.5 km^2. Although there was overlap in the size range of BRZs and mandatory reserves, on average the BRZs were smaller (mean size 0.7 km^2) than mandatory reserves (mean size 1.2 km^2). The amount of preferred rocky habitat (fractured bedrock and rock piles) in San Juan County totaled 70,309,249 m^2, or 7% of the total mapped area. The proportions of rocky habitat in BRZs ranged from 11% to 74% and from 31% to 37% in mandatory reserves (Table 1). In total, the mandatory reserves occupied 0.32% of San Juan County's marine area, while BRZs covered 0.50%. When viewed in light of suitable habitat for bottomfish, mandatory reserves occupied 1.6% of the preferred rocky habitat that has been mapped, while BRZs occupied 2.4%.

Fishing effort

Bottomfishing effort was observed on 38 out of 46 days between May 1st and June 15th, 2003. Effort was evenly distributed between voluntary BRZs and reference sites (p=0.5465). The one mandatory reserve studied had significantly less fishing effort than its reference site (p<0.0001). During 60 dives (half in BRZs and half in references), boats were observed fishing in BRZs 3 times and also in reference sites on 3 occasions. Divers found bottomfish jigs (terminal tackle) twice in BRZs and twice in reference sites. In addition, numerous citizens reported the existence of fishing pressure in BRZs as well as in mandatory reserves.

Discussion

Fish populations in the voluntary reserves were dynamic. Yet, they showed no consistent increasing trends for the five target species compared to reference sites. For example, lingcod and copper rockfish had greater densities in BRZs during 2006, but not in 2007. Kelp greenling were larger in reserves but the difference in mean length became less overtime rather than more. Target species in voluntary reserves did not become consistently and increasingly larger or occur in greater densities relative to reference sites. Fish population densities and length-frequency distributions did change between years and between sites, but not in a consistent manner or between all BRZ / reference site pairs that would indicate a beneficial reserve effect.

Insufficient time was not likely the cause for lack of reserve effect. Studies on mandatory reserves in San Juan County demonstrate positive reserve effects after 8-10 years (Palsson & Pacunski 1995; Palsson, 1998; Eisenhardt 2001), suggesting that after 10 years one would expect to see reserve effects in BRZs when compared to fished reference sites. This study did not account for the possible, but unlikely, scenario in which the marine environment of the ten-year period the BRZs have been in effect (1997-

2008) was somehow different and not as conducive to bottomfish productivity as the ten-year period that evidenced positive reserve effects in mandatory reserves (1990-2001). Simultaneous studies of both voluntary and mandatory reserves would eliminate this unlikely scenario. Finally, fishing seasons and regulations have become more restrictive during the later ten-year period, which would also become moot with simultaneous studies.

Poor habitat was not the reason that voluntary BRZs failed to show a beneficial reserve effect overtime. Data collected during SCUBA surveys also supported the community-based selection process's ability to locate BRZs in suitable bottomfish habitat. Based on recently constructed marine benthic habitat maps (Tilden 2004) half the BRZs had over 40% rocky habitat (and two >70%), while the three comparable mandatory reserves had 31-37% rocky habitat. Mandatory reserves with less suitable habitat show beneficial reserve effects. Voluntary reserves failed to demonstrate these effects on the same target species given similar time since reserve formation.

Compliance issues with voluntary reserves were evident and non-compliance with voluntary marine reserves was likely a major factor reducing BRZ efficacy in producing larger and denser fish populations. Fishing within BRZs was identified in the focused study of fishing pressure and was not in the mandatory reserve studied. Boats actively fishing were sighted in BRZs during SCUBA surveys and terminal tackle used to target bottomfish was recovered by divers in BRZs. Despite outreach and educational efforts, numerous private citizens reported seeing bottomfishing activity inside BRZs. While some people likely fished in BRZs unknowingly, anecdotal evidence also suggests that some anglers targeted BRZs. For example, a long-time clerk at a local grocery store spoke of visiting fishermen specifically asking for the BRZ outreach brochure to use as a map of places to fish. While the study on fishing pressure failed to detect people fishing in one mandatory reserve included in the study, people interviewed reported occasionally seeing people fishing in mandatory reserves but not as often as in BRZs.

In conjunction with non-compliance, reserve size seemed to be a contributing factor reducing BRZ efficacy. Two of San Juan County's mandatory reserves (1.58 km^2 and 1.55 km^2) exhibit beneficial reserve effects (Palsson and Pacunski 1995; Palsson 1998; Eisenhardt 2001), as has a 2.16 km^2 mandatory reserve protecting a similar suite of fish off La Jolla, California (Parnell et al. 2005). While the two larger BRZs were similarly sized (approximately 1.8 km^2), the other six BRZs were smaller (less than 0.6 km^2). Smaller reserve size my have increased the relative impact of fishing within a reserve. Additionally, fishing at the edge of the reserve would have had greater impact on smaller reserves, especially if the home range of target fish species was close to or greater than the size of the reserve.

Acoustic telemetry work conducted in or near BRZs suggests that the home ranges of lingcod (Griffin 2000; Rudd 2006) and kelp greenling (Perez 2005) are larger than BRZs. In addition, copper rockfish home range is similar to the size of most BRZs (Matthews 1990a, 1990b; Eisenhardt 2003). At a minimum, reserves need to encompass the home range of the species for which it is designed to protect and it was questionable if many of the BRZs do this. Increasing the size of BRZs would also decrease the impact of illegal or non-compliant fishing, decrease the impact of fishing at the edge of the reserves and increase the probability that fish within a reserve would remain in reserves.

Increasingly, marine resource managers and scientists are aware of the importance of community involvement for effective resource conservation and sustainability (Gunderson 2008). The San Juan County Marine Resources Committee recognized this at the time that BRZs were created and consequently spent substantial time and money educating the public about the voluntary nature of the BRZs as well as the long-term benefits of the BRZs to the community. However, we saw that we could not expect an education and outreach effort to sway an entire target population. This realization, combined with the marginal size of the BRZs relative to the home range of the target fish, likely resulted in reduced long-term efficacy of these reserves. Effective mandatory reserves of a given size appeared to need to be several times larger if voluntary.

The relationship of reserve efficacy relative to size was not independent of regulatory nature. While studies suggest that enforcement can be more important than community involvement (Byers 2007), it was clear from data in San Juan County that jurisdictions attempting to use voluntary reserves need to account for less than 100% compliance and plan reserve size accordingly. The availability of appropriate habitat was not a limiting factor in reserve design. Appropriate habitat is available in San Juan County to expand BRZs. Expanding voluntary reserve size, or transforming voluntary BRZs into mandatory reserves or some combination of the two should be considered for increasing the impact on recovering bottomfish species.

This study of San Juan County's voluntary reserves reiterates the need for monitoring and adaptive management (Mills & Rawson 2004; Sato & Wylie-Echeverria 2004). If the study had been conducted over fewer years, inter-annual variation in abundance and size could have led to results suggesting voluntary reserves were having a positive effect. It was only because surveys were conducted over seven years that we can conclude no long-term reserve benefit exists. While increased funding would have permitted more intensive SCUBA surveys and better evaluation of fishing pressure, the monitoring that was conducted is sufficient to determine that voluntary reserves failed to be any more effective than reference site controls in recovering bottomfish.

Acknowledgments

Funding for this project was provided by the SeaDoc Society, the Northwest Straits Commission, the San Juan County Marine Resources Committee, the Charlotte Martin Foundation, the Ander's Foundation and numerous private donors, including R. Lundeen, J. and K. Youngren and others. We thank the following divers and boat tenders who assisted with SCUBA transects and data collection: P. Kitaeff, K. Koski, G. Lefever-Button, K. Marrie, M. Naugle, J. Nichols, C. Nichols, S. Sublett, T. Dakin, M. Dixon, B. Jensen, B. Nichols, M. O'Connell, L. Self, H. Stewart, K. Matterson, and S. Maslakova. We thank two Directors of the Friday Harbor Laboratories, A.O.D. Willows and K. Sebens, for donating dock space, dive lockers, air, and the dive safety officer support of D. Duggins and P. Kitaeff. H. Fastenau of the University of California at Davis also provided dive safety officer services. M. Kaill, L. Moulton and B. Davis independently collected and provided transect fish count and fishing pressure data. We thank the Geological Survey of Canada and the Canadian Hydrographic Service for assistance mapping the seafloor and C. Endris, who completed GIS habitat analysis and

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Literature Cited

Beaudreau, A. H., and T. E. Essington. 2007. Spatial, Temporal, and Ontogenetic Patterns of Predation on Rockfishes by Lingcod. Transactions of the American Fisheries Society **136**: 1438-1452.

Berkeley, S. A., M. A. Hixon, R. J. Larson and M. S. Love. 2004a. Fisheries Sustainability via Protection of Age Structure and Spatial Distribution of Fish Populations. Fisheries **29**: 23-32.

Berkeley, S. A., Chapman, C., and Sogard S. 2004b. Maternal age as a determinant of larval growth and survival in a marine fish, *Sebastes melanops*. Ecology **85**: 1258-1264

Byers, J. E. and E. G. Noonburg. 2007. Poaching, enforcement, and the efficacy of marine reserves. Ecological Applications **17:** 851–1856

Crawford B., M. Kasmidi, F. Korompis and R. B. Pollnac. 2008. Factors Influencing Progress in Establishing Community-Based Marine Protected Areas in Indonesia. Coastal Management **34**: 39-64.

Davis, B. 2003. Bottomfish Recovery Zone Fishing Pressure Assessment. Report to the San Juan County Marine Resources Committee, 10pp.

Eisenhardt, E.P. 2001. Effect of the San Juan Islands Marine Preserves on demographic patterns of nearshore rocky reef fish. M.S. Thesis. School of Aquatic and Fishery Sciences, University of Washington, Seattle, Washington. 272pp.

Eisenhardt, E.P. 2003. 2002 Acoustic telemetry project final report to the San Juan County Bottomfish Recovery Program. San Juan County Marine Resources Committee, Friday Harbor, Washington. 29p.

Gell, F. R. and C. M. Roberts. 2003. Benefits beyond boundaries: the fishery effects of marine reserves. Trends in Ecology and Evolution **18**: 448-455.

Greene, H. G., Yoklovich, M. M., Starr, R. M., O'Connell, V. M., Wakefield, W. W., Sullivan, D. E., McRea Jr., J. E., and Cailiet, G. M., 1999. A classification scheme for deep seafloor habitats. Oceanologica Acta **22**:663-678.

Greene, H. G., Bizzarro, J. J., Tilden, J. E., Lopez, H. L., and Erdey, M. D, 2005. The benefits and pitfalls of geographic information systems in marine benthic habitat mapping. In Wright, D. J., and Scholz, A. J., eds., Place Matters Geospatial Tools for Marine Science, Conservation, and Marine Management in the Pacific Northwest: Oregon State University Press, Corvalis, OR, p. 34-46.

Greene, H. G., Bizzarro, J. J., O'Connell, V. M., and Brylinsky, C. K., 2007. Construction of digital potential marine benthic habitat maps using a coded classification scheme and its applications. In Todd, B. J., and Greene, H. G., Mapping the Seafloor for Habitat Characterization: Geological Association of Canada, Special Paper 47, p. 141-155.

Griffin, M. 2000. Evaluation of acoustic telemetry and visible implant fluorescent elastomer as tracking tools of *Ophiodon elongatus* within a San Juan County "no-take" reserve. Fish biology class reports, University of Washington, Friday Harbor Laboratories.

Gunderson, D. R., A. M. Parma, R. Hilborn, J. M. Cope, D. L. Fluharty, M. L. Miller, R. D. Vetter, S. S. Heppell, and H. G. Greene. 2008. The Challenge of Managing Nearshore Rocky Reef Resources. Fisheries **33**:172-179.

Hahn A. 2007. Mr. Tides 3, Version 3.0 (Release 16). Hahn Software.

Halpern, B. S., and R. Warner. 2003. The impact of marine reserves: Do reserves work and does size matter? *Ecological Applications* 13:117–137.

Hilborn, R., K. Stokes, J-J. Maguire, T. Smith. L. W. Botsford, M. Mangel, J. Orensanz, A. Parma, J. Rice, J. Bell, K. L. Cochrane, S. Garcia, S. J. Hall, G. P. Kirkwood, K. Sainsbury, G. Stefansson, and C. Walters. 2004. When can marine reserves improve fisheries management? Ocean & Coastal Management **47**: 197-205.

Horwich R. H., and J. Lyon. 2007. Community conservation: practitioners' answer to critics. Oryx **41**: 376-385.

International Hydrographic Organization, 1998. IHO standards for hydrographic surveys. International Hydrographic Bureau, Monaco, International Hydrographic Organization Special Publication no. 44.

Kaill, W. M. 2001. Bottomfish Recovery Project Final Report 2000. San Juan County Bottomfish Recovery Program. San Juan County Marine Resources Committee, Friday Harbor, Washington. 85p.

Koski, K. 2001. Bottomfish Recovery Project Coordination Final Report 2001. San Juan County Bottomfish Recovery Program. San Juan County Marine Resources Committee, Friday Harbor, Washington. 43p.

Lea, R. N., R. D. McAllister and D. A. Ventresca. 1999. Biological Aspects of Nearshore Rockfishes of the Genus Sebastes from Central California With Notes On Ecologically Related Sport Fishes. California Fish and Game Fish Bulletin **177**:1-112.

Lundquist, C. J. and E. F. Granek. 2005. Strategies for Successful Marine Conservation: Integrating Socioeconomic, Political, and Scientific Factors. Conservation Biology **19**: 1771–1778.

Martell, S. and S. S. Wallace. 2000. The Use of Marine Protected Areas for the Conservation of Lingcod. Bulletin of Marine Science **66:**957-990.

Matthews, K. 1990a. An experimental study of the habitat preference and movement patterns of copper, quillback, and brown rockfishes (*Sebastes* spp.). Environmental Biology of Fishes **29:**161-178.

Matthews, K. 1990b. A telemetric study of the home ranges and homing routes of copper and quillback rockfishes on shallow rocky reefs. Canadian Journal of Zoology **68:**2243-2250.

Mills, C. E. and K. Rawson. 2004. Outlook grim for North Pacific Rockfish: Rockfish Symposium, Friday Harbor Laboratories, University of Washington, USA, September 25–26, 2003. Fish and Fisheries **5**:178-180.

Moulton, L. L. 1977. An ecological analysis of fishes inhabiting the rocky near shore regions of northern Puget Sound, Washington. Ph.D. Dissertation, School of Fisheries, University of Washington, Seattle, Washington. 181 pp.

Musick, J. A., M. M. Harbin, S. A. Berkeley, G. H. Burgess, A. M. Eklund, L. Findley, R. G. Gilmore, J. T. Golden, D. S. Ha, G. R. Huntsman. 2001. Marine, Estuarine, and Diadromous Fish Stocks at Risk of Extinction in North America (Exclusive of Pacific Salmonids). Fisheries **25:**6-30.

Pacunski, R. and W. Palsson. 2001. Macro- and Micro-habitat Relationships of Adult and

Sub-Adult Rockfish, Lingcod, and Kelp Greenling in Puget Sound. Proceedings of the 2001 Puget Sound Research Conference. Puget Sound Action Team, Seattle, Washington.

Paddack, M. J., and J. A. Estes. 2000. Kelp forest fish populations in marine reserves and adjacent exploited areas of central California. Ecological Applications **10**:855–870.

Palsson, W. A., and R. E. Pacunski. 1995. The response of rocky reef fishes to harvest refugia in Puget Sound. In: Puget Sound Research '95, Vol. 1, pages 224-234. Puget Sound Water Quality Authority, Olympia, WA.

Palsson, W.A. 1998. Monitoring the response of rockfish to protected areas. In: Marine harvest refugia for West Coast rockfish: A workshop. NOAA Technical Memorandum NMFS. NOAA-TM-NMFSSWFSC-**255:**64-73.

Parker, S. J., S. A. Berkeley, J. T. Golden, D. R. Gunderson, J. Heifetz, M. A. Hixon, B. M. Leaman, R. Larson, M. S. Love, J. A. Musick, V. M. O'Connell, S. Ralston, H. J. Weeks, and M. M. Yoklavich. 2000. Management of Pacific rockfish. Fisheries **25(3)**:22–29.

Parnell, P. E., C. E. Lennert-Cody, L. Geelen, L. D. Stanley, and P. K. Dayton. 2005. Effectiveness of a small marine reserve in southern California. Marine Ecology Progress Series **296**: 39–52.

Perez, K. 2005. Movement patterns of kelp greenling (*Hexagrammus decagrammus*) around Friday Harbor. An unpublished class project. Fish biology 1991. University of Washington, Friday Harbor Laboratories.

Puget Sound Action Team. 2007. 2007 Puget Sound Update: Ninth Report of the Puget Sound Ambient Monitoring Program. Puget Sound Action Team. Olympia, Washington.

Roberts, C. M., J. A. Bohnsack, F. Gell, J. P. Hawkins, and R. Goodridge. 2001. Effects of marine reserves on adjacent fisheries. Science **294:**1920–1923.

Rudd, C. 2006. Using Acoustic Telemetry to Investigate the Movement Patterns of Male Sub-adult Lingcod (*Ophiodon elongatus*) in a Marine Preserve. Fish biology class reports, University of Washington, Friday Harbor Laboratories.

Sato, M., and T. Wylie-Echerrvia. 2004. Best science and best management for rockfish and lingcod in San Juan County. Report to the San Juan County Marine Resources Committee, Friday Harbor, Washington.

Stout, H. A., B. B. McCain, R. D. Vetter, T. L. Builder, W. H. Lenarz, L. L. Johnson, and R. D. Methot. 2001. Status review of copper rockfish (*Sebastes caurinus*), quillback rockfish (*S.maliger*), and brown rockfish (*S. auriculatus*) in Puget Sound, Washington. NOAA Technical Memorandum NMFS-NWFSC-46, 158 pp.

Tilden, J. E., 2004. Marine geology and potential rockfish habitat in the southwestern San Juan Islands, Washington. Masters of Science Thesis, Moss Landing Marine Laboratories, Moss Landing, 121 p.

West, J. 1997. Protection and Restoration of Marine Life in the Inland Waters of Washington State. Puget Sound Georgia Basin Environmental Report Series: Number 6. Puget Sound Action Team. Olympia, Washington.

Zar, J.H. 1984. Biostatistical Analysis, 2nd Edition. Prentice Hall, Englewood Cliffs, New Jersey.

Table 1. Areas of bottomfish reserves in San Juan County and proportions of rocky habitat. Data are square meters.

		total area	% of County	area mapped	% mapped	rocky area	% rocky of mapped
SJC marine waters		1,152,622,903	100%	948,740,007	82%	70,309,249	7%
BRZ1	Point Lawrence	430,356	0.037%	335,369	78%	103,702	31%
BRZ2	Kellet Bluff	580,103	0.050%	461,492	80%	327,807	71%
BRZ3	Lime Kiln	475,217	0.041%	291,857	61%	216,156	74%
BRZ4	Pile Point	276,308	0.024%	243,269	88%	125,488	52%
BRZ5	Bell Island	106,216	0.0092%	90,849	86%	37,110	41%
BRZ6	Charles Island	321,431	0.028%	233,267	73%	66,650	29%
BRZ7	Flattop Island	1,734,011	0.15%	1,687,136	97%	568,546	34%
BRZ8	Bare Island	1,888,826	0.16%	1,820,135	96%	208,179	11%
Man1	Shaw Island	1,578,745	0.14%	1,393,013	88%	510,386	37%
Man2	Point Caution	1,547,294	0.13%	1,449,625	94%	520,289	36%
Man3	Yellow/Low Island	508,362	0.044%	338,316	67%	103,975	31%
Man4	False Bay	1,486,458	0.13%	124,153	8%	16,229	13%
Man5	Argyle Lagoon	42,157	0.0037%	0	0%	0	0%

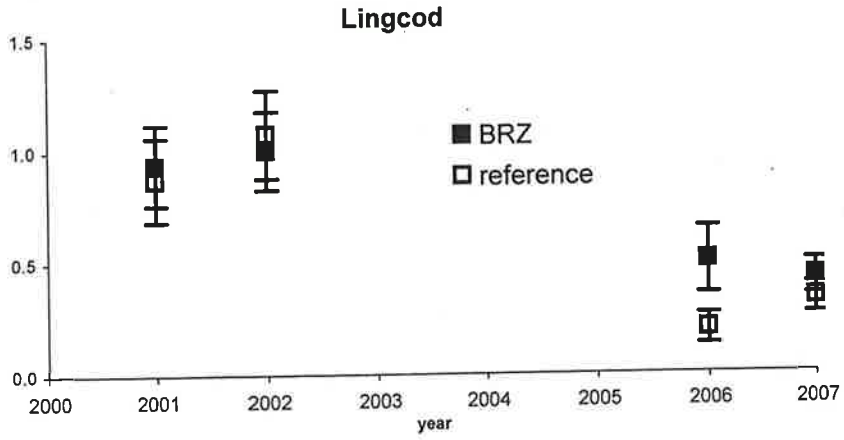
Figure headings

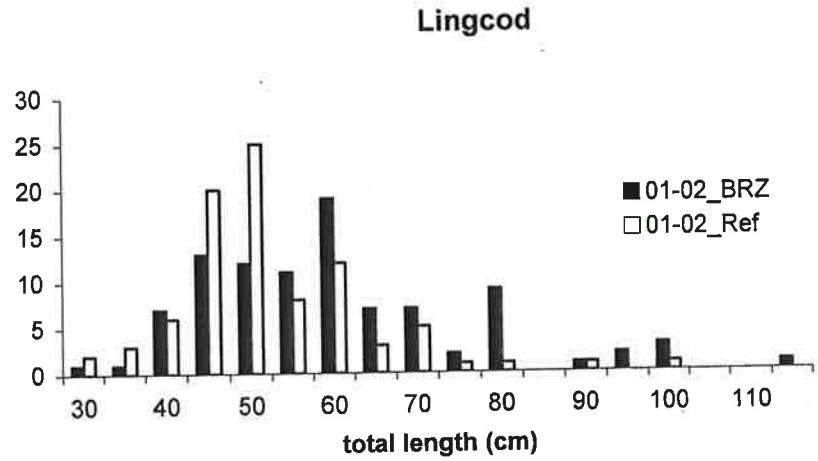
Figure 1: Map of San Juan County, Washington (USA), including rocky habitat, voluntary reserves, reference fished-areas and mandatory no-take reserves. Dashed line represents the boundary of San Juan County.
Figure 2: Fishing effort survey (Davis 2003).
Figure 3: Lingcod population densities and length-frequency distributions in BRZs and associated reference sites overtime.
Figure 4: Copper rockfish population densities and length-frequency distributions in BRZs and associated reference sites overtime.
Figure 5: Kelp greenling population densities and length-frequency distributions in BRZs and associated reference sites overtime.
Figure 6: Black rockfish population densities and length-frequency distributions in BRZs and associated reference sites overtime.

Figure 1.

Figure 2

Figure 3


Lingcod
1.5
1.0
0.5
0.0
BRZ
reference
2000
2001
2002
2003
2004
2005
2006
2007
year


Lingcod
30
25
20
15
10
5
0
01-02_BRZ
01-02_Ref
30
40
50
60
70
80
90
100
110
total length (cm)

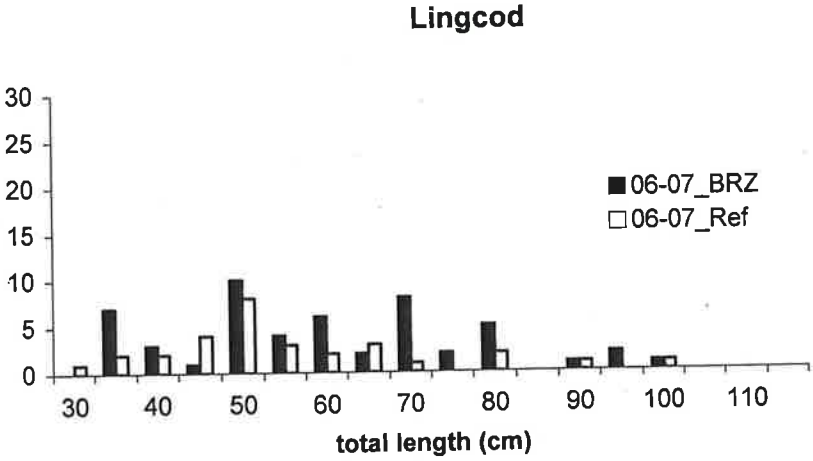
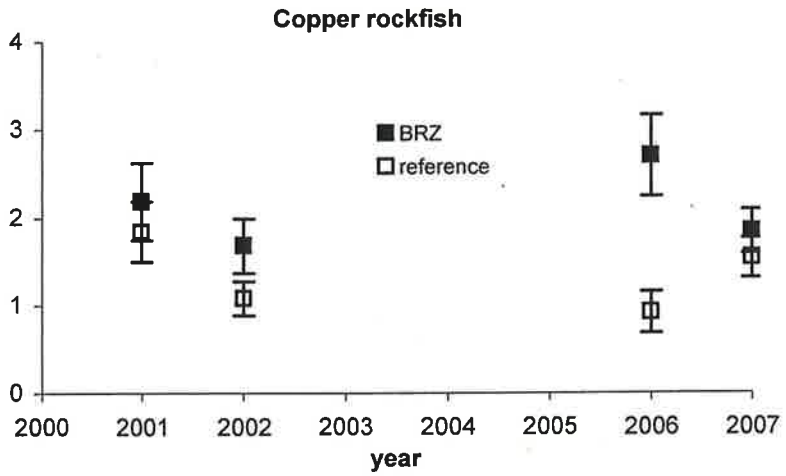
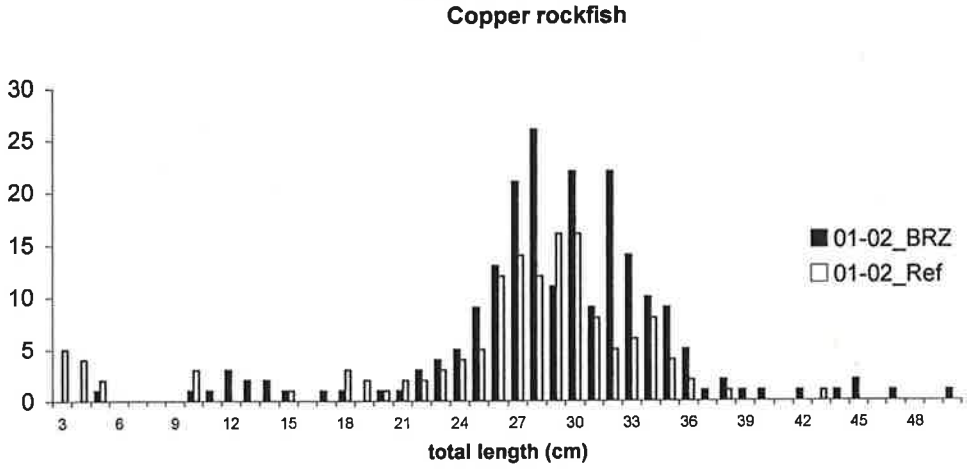

Lingcod
30
25
20
15
10
5
0
06-07_BRZ
06-07_Ref
30
40
50
60
70
80
90
100
110
total length (cm)

Figure 4


Copper rockfish
BRZ
reference
year


Copper rockfish
01-02_BRZ
01-02_Ref
total length (cm)

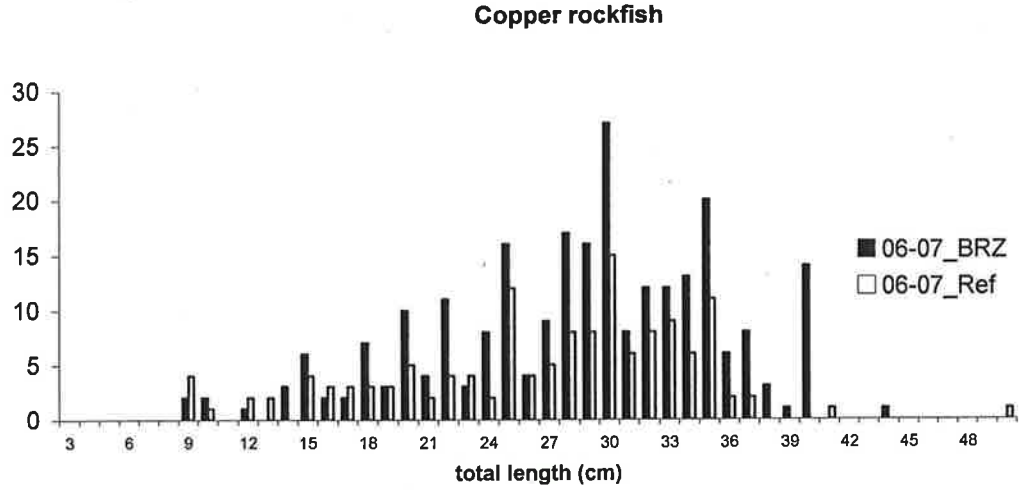

Copper rockfish
06-07_BRZ
06-07_Ref
total length (cm)

Figure 5

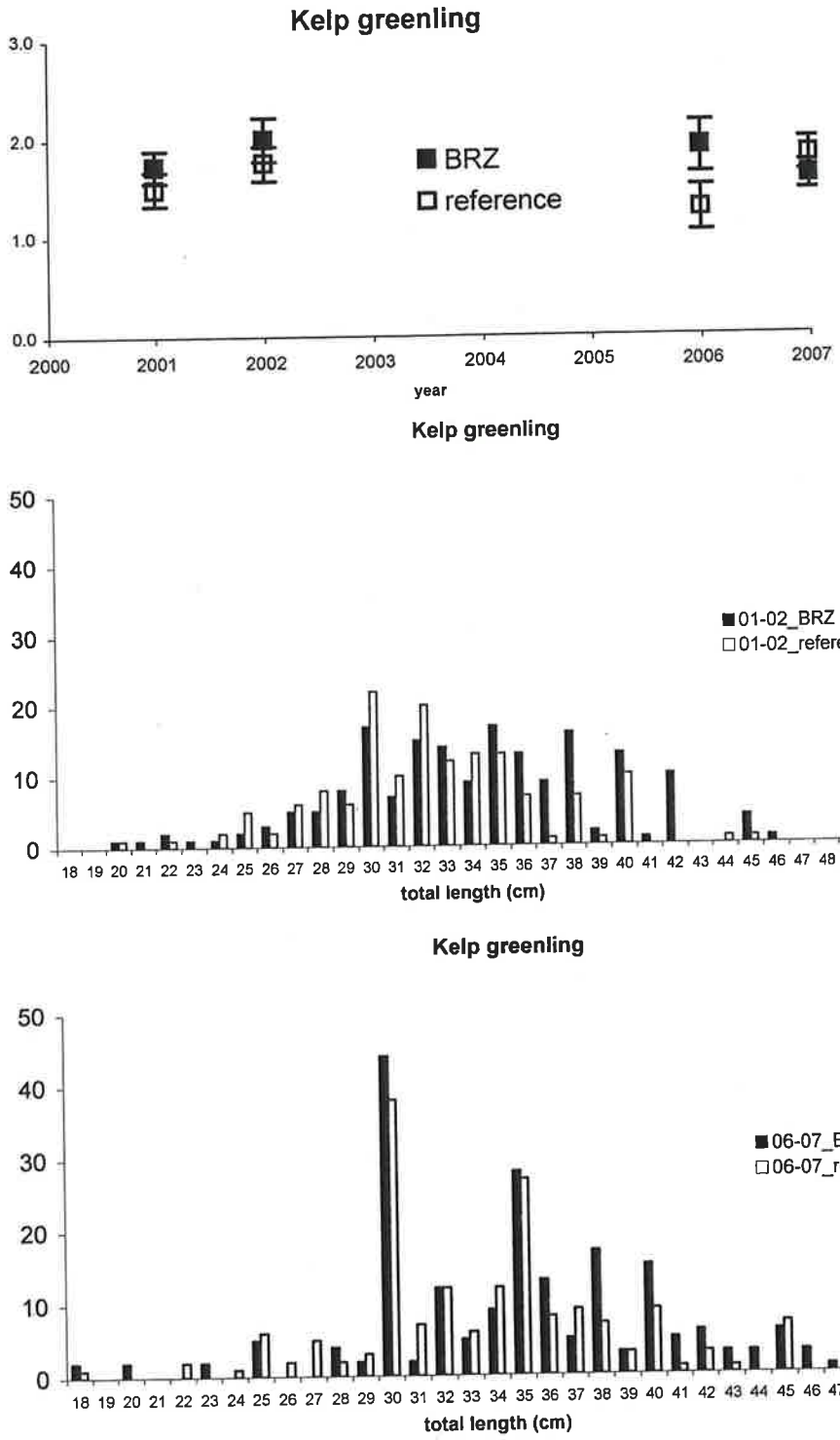
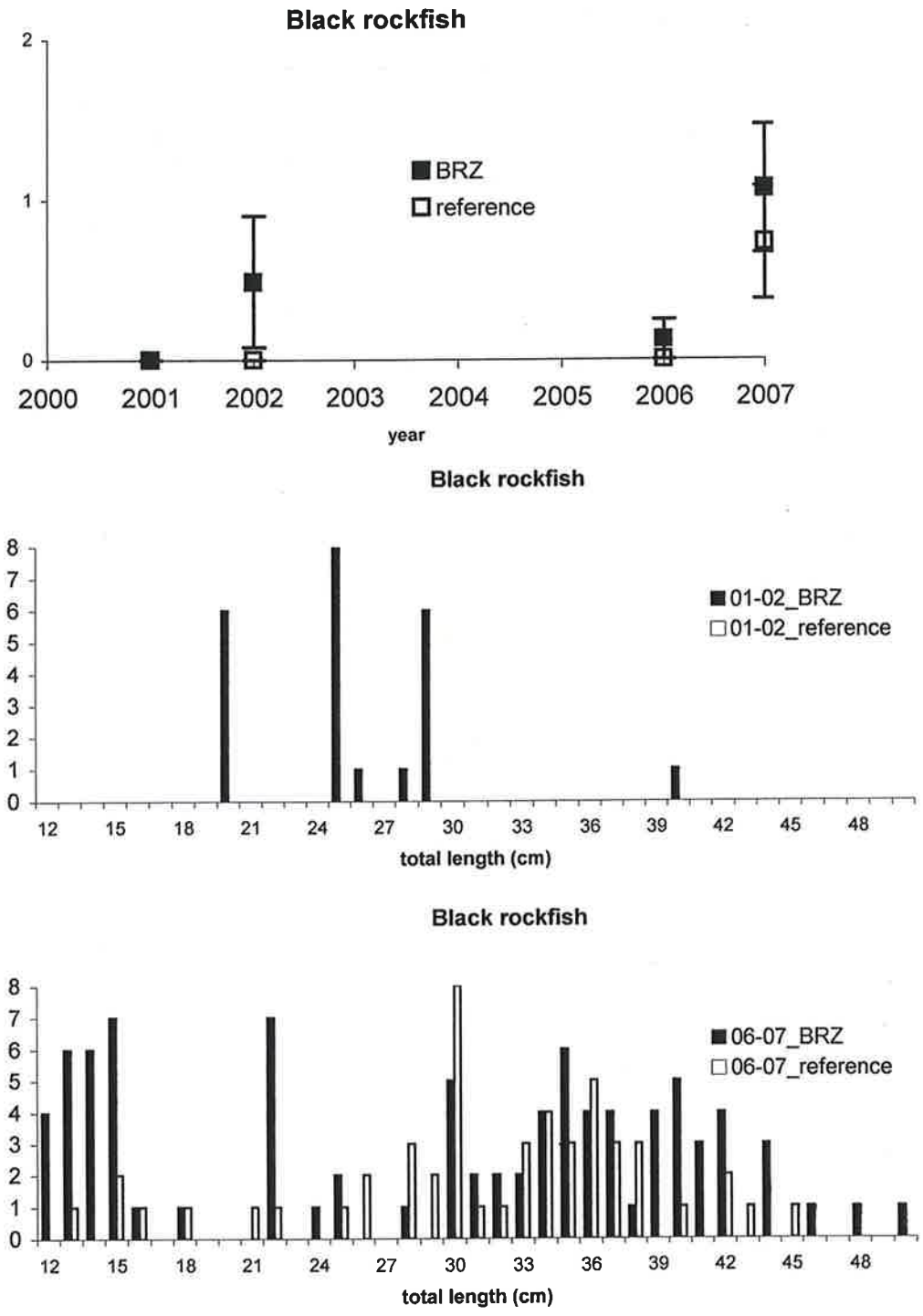

Kelp greenling
3.0
2.0
1.0
0.0
BRZ
reference
2000
2001
2002
2003
2004
2005
2006
2007
year
Kelp greenling
50
40
30
20
10
0
01-02_BRZ
01-02_reference
18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50
total length (cm)
Kelp greenling
50
40
30
20
10
0
06-07_BRZ
06-07_reference
18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50
total length (cm)

Figure 6.


Black rockfish
2
1
0
BRZ
reference
2000
2001
2002
2003
2004
2005
2006
2007
year
Black rockfish
8
7
6
5
4
3
2
1
0
01-02_BRZ
01-02_reference
12
15
18
21
24
27
30
33
36
39
42
45
48
total length (cm)
Black rockfish
8
7
6
5
4
3
2
1
0
06-07_BRZ
06-07_reference
12
15
18
21
24
27
30
33
36
39
42
45
48
total length (cm)

From: joye bucklin
To: SEPADesk2 (DFW);
Subject: Comment on DEIS for Puget Sound Rockfish Conservation Plan
Date: Thursday, December 31, 2009 1:11:32 AM

2716

The Draft Environmental Impact Statement (DEIS) for the Puget Sound Rockfish Conservation Plan is inadequate and should be rejected. At a minimum it does not adequately describe the potential adverse impact to recreation and to the economy nor does it provide an adequate description of the Stressors to rockfish recovery thereby misdirecting recovery efforts.

The reason that the DEIS is deficient in at least the two cited required areas of analysis is because the draft Puget Sound Rockfish Conservation Plan (hereinafter the Plan) itself is little more than purported facts, a listing of potential tools to further rockfish conservation, and guidelines for conservation. In short, it is a plan for developing a Plan. The draft Plan is totally deficient in specific recommended actions (e.g. how many Marine Protected Areas and/or Rockfish Recovery Areas , their sizes, and what limitations may be placed on recreation in those areas). Nor does the Plan even provide ranges for such areas and limitations. Without that level of specificity there is no way that the DEIS can sufficiently address the draft Plan's impact upon recreation and the economy and it must, therefore, be rejected.

It is also important to point out that the WDFW held a number of public hearings on the draft Plan and during those hearings promised to respond to individuals who posed questions or pointed out specific areas of concern. Unfortunately, WDFW did not follow-through on this promise as they did not provide specific information nor did they correct obvious significant errors in the Plan.

As examples I will cite that during the Olympia meeting Staff was asked to provide a break-out of the 35,000 annual rockfish encounters (2004-2007) as cited in the draft Plan by marine area and by species. The Staff said they would provide that information yet it has not been included via addendum to the draft Plan nor has that information been provided directly to the requestor. This is critical information to identify where fishing restrictions might have the desired effect of reducing inadvertent contact with sportfishers and should have been made available for the public during their review and comment.

Similarly, at paragraph 2.7 Stressors and Limiting Factors, it was pointed out to Staff that citing Past Fishery Removals as a likely stressor limiting rockfish populations was disingenuous; that what should be addressed is current stressors yet there is no listing for Current Fishery Removal. This misdirection has not been addressed. It is noted that Past Fishery Removals is listed as a High Stressor as is Derelict Gear (61,000 rockfish killed per year). Yet the draft Plan cites current

(2004-2007) annual encounters by sportfishers at 35,000 in Puget Sound with approximately 13,000 of those having been harvested. The draft Plan also includes the following "We conclude that the decline in abundance and size observed for several species of rockfish is primarily due to the effects of past fishing." Again, this information is an opinion and does not adequately consider another stressor listed in the draft Plan, that being Food Web Dynamics which is listed as a Moderate Stressor.

At paragraph 2.7.7 the draft Plan identifies that harbor seal populations in Puget Sound have increased from several hundred in the early 1970s to over 14,000 in 2007. The writers detail average seal weight and percentage of body weight in food consumed daily and then write that the total amount of food consumed by the 14,000 seals in Puget Sound is 2.2 million kg (over 5 million pounds) and further describe this as "quite high." Unfortunately, using their own information the total food consumption figure should calculate out to 28,616,000 pounds per year; that is, over five times the amount the writers describe as being "quite high." I personally pointed out this apparent error and was assured it would be looked at and I would be provided a response. That has not occurred.

In this same paragraph it was pointed out that half the seals (7,000) were in the San Juan Islands and that rockfish made up 12% of seal diets annually. That means that 7,000 seals there consume 14,308,000 pounds of food per year and that 12% (1,716,960) is rockfish. Using a per rockfish average weight of 2 pounds (a figure agreed upon by presenting Staff) that equates to seals in the San Juans consuming 858,480 rockfish per year. In addition to pointing out this large number of rockfish being consumed by seals (and not including predation by California sea lions or Stellar sea lions) I asked how this predation rate could be described as Moderate whereas Derelict gear (61,000 fish) is listed as High. There was no response at the hearings nor has there been any correction to the numbers or ratings. One of my comments was that in order to develop a proper conservation plan we need to have all of the Stressors identified and rated as to their relative importance. It is intellectually dishonest to not properly identify and comparatively rate seal (plus other pinnipeds) predation against other stressors. Again, no action was taken in response to these suggestions.

Can there be rockfish recovery if pinnipeds consume over 858,480 rockfish in just the San Juans? My opinion is that pinnipeds have more than replaced both sport and commercial fishing in limiting rockfish recovery. Again, the total annual sport fishing encounters for 2004-2007 was 35,000 of which roughly 13,000 were harvested. Also, recent Economic Recovery Act funding is cleaning up most of the derelict gear which is expected to substantially reduce the 61,000 annual rockfish kill attributed to that High stressor – a fact not included in the draft Plan. So, we

are left with current fishing (13,000) being the focus of this draft Plan and absolutely no discussion of the huge impact of seals and other pinnipeds and possible reduction of their numbers. In short, this draft Plan totally ignores (for political reasons?) the 800 pound gorilla at the family dining table. To the extent that the draft Plan fails in this area the DEIS is similarly deficient and needs to be rejected.

Also, to the extent that WDFW has failed to provide timely corrections to significant errors pointed out during the public review process those errors have continued to potentially mislead readers of the draft Plan. We cannot have a healthy public review process if the Agency does not respond as promised nor timely correct patent errors of consequence. Those failures further cloud the legitimacy of this draft Plan and corresponding DEIS and support my recommendation that it be rejected.

The WDFW has embraced a recommendation received during public discussion and has stood up an advisory group of stakeholders to work with Staff to develop the Plan in a cooperative manner. I recommended during the public testimony that this DEIS be rejected and that the WDFW work in conjunction with the advisory group to develop a real draft Plan and then have that draft Plan and DEIS go through the public review process prior to being finalized. I hereby make that recommendation again.

Respectfully Submitted,

Laurence A. Bucklin

Theresa A. Eturaspe
SEPA/NEPA Coordinator
600 Capital Way North
Olympia WA 98501-1091
SEPA link at http://www.wdfw.wa.gov/hab/sepa/sepa.htm

RE: Puget Sound Rockfish Conservation Plan

I would like to submit a few recommendations to the draft of your agency's EIS to restore rockfish and the Salish Sea. The EIS is a scientific step toward resolving problems of multi-species fish management in an effort to reestablish sustainable population levels for all species. I support your efforts.

Marine reserves have a potential that is becoming a mainstream fisheries management tool. It is a necessary one, given the negative state of rockfish. A review and consensus policy statement by the American Fisheries Society found several species of Salish Sea Rockfish are vulnerable; over harvest is the prime cause for decline. Current recreational harvest and incidental by-catch of commercial operations has kept populations suppressed.

If marine reserves were established and regulated as "no take" fishing zones, Washington State could see a significant increase in rockfish and other fish, as well as their size.. This could help re-establish their genetics towards the size fish once were, before the big fish were over fished, leaving the smaller ones to procreate.

Recreational, commercial and tribal fishermen are currently harvesting all fish species and populations in the Salish Sea at less than 1% of historic levels. Hatchery production alleviates that production problem. But hatcheries contribute to genetic drift and affect wild fish populations. Net pen farming harms wild fish populations by their release of parasites to wild fish, the diminution of a healthy marine area below and around net pens, and release of toxins – including feed -- into the marine system from net pen operations. Marine reserves can both restore the health and numbers of the dwindling populations of wild fish.

Unfortunately, Washington State has the smallest and least effective system of marine reserves, and most severely degraded fish stocks. Marine reserves have been shown to be the best, most cost effective, fisheries management technique to combat genetic drift due to over fishing and ecosystem degradation. Twenty three nations have established marine reserves. Restoration results are generally outstanding if the reserves are large enough and old enough. Biomass, density, fish size and species diversity have dramatically increased

Commercial and tribal harvest of any fish species that incidentally takes rockfish means curtailment of commercial and tribal catch must be discussed in the revised plan. Acceptance of the Marine Reserve concept and the restrictions on recreational, commercial and tribal fishing will require a truly exceptional education and outreach program. It needs more work and much public vetting. Recreational fishermen would be far more receptive to the idea of marine reserves if they knew closures and restrictions impacted all fishermen more or less equally.

Please take into account my comments in your redrafting of the plan, which I look forward to reviewing when all comments are accounted for.

Respectfully submitted,

Darlene Schanfald
481 Holgerson Rd
Sequim WA 98382
360-681-7565
darlenes@olympus.net

From: Capt. Dave Drewry
To: SEPADesk2 (DFW);
Subject: Puget Sound Rockfish Conservation Rules
Date: Wednesday, December 30, 2009 9:57:51 AM

2-14

Hello WDFW,

~ We have been running a charter fishing service in Port Townsend- *Peninsula Sportsman* for the past 8 years and are licensed w/a USCG "6 pack" and non-salmon charter licensing through WDFW. Our charters specifically target " shallow water" halibut, lingcod and sea bass in the Strait of Juan de Fuca and N. Puget Sound during spring and summer. Our services result in additional fishing licenses sold for the WDFW and our fishermen provide much needed monies for Port Townsend by purchasing lodging, meals, shopping, etc. thus helping most aspects of our local economy.

~ My understanding of the new PS rockfish rules proposed is the elimination of any rockfish retention in all marine areas and a modification of the existing lingcod and halibut seasons and rules. This would lead to a crushing blow for our business for our spring and summer fishing. Most of our rockfish fishing here is already extremely limited due to a single fish limit and the lingcod season is minimal w/ the current 1 1/2 month season. The majority of our fishing is done in waters less than 100' on more prevelant species such as copper rockfish and those fed listed species --yelloweye and canary rockfish-- are not effected by our sport fishing in these areas. In my time fishing these waters over the past two decades, particularly the Strait, we have noticed an upswing in shallow water rockfish and lingcod populations in the waters we fish.Why lump all marine areas into one closure ? It seems to reason that fisheries on the Strait where rockfish and lingcod populations are doing better should not be included in regulation for areas further into the Puget Sound where rockfish are suffering more serious population declines. More research and consideration is necessary on these issues before regulation puts more fishing dependent businesses-- out of business.

Thank you for your consideration,

Capt. David Drewry
owner/ operator
Peninsula Sportsman Guide and Outfitting Service LLC-- Port Townsend,

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From: Bob McClure
To: SEPADesk2 (DFW);
Subject: Comments: Puget Sound Rockfish Conservation Plan
Date: Tuesday, December 29, 2009 3:03:02 PM

SEPA Team,
Great document. Thanks for the opportunity to comment.

I would like to complement the WDFW on the proposal to pursue cooperative research activities for addressing the needs of the PSRCP. **I would encourage the consideration of cooperative monitoring, evaluation and adaptive management also.** WDFW has been hampered in the past by restrictions or reductions in field capabilities of state staff. However, with new technologies and data collection methods, field activities which are designed for other activities (such as regular visits by UW to Hood Canal for various studies) could collect data on behalf of WDFW, which could be used for rockfish distribution and abundance (e.g. using portable hydroacoustic equipment) at an incremental cost increase. Another consideration for cooperative data collection would be to train and contract with co-managers for data collection in support of stock assessment and monitoring. Data collection using "vessels of opportunity" can provide sci entific-quality data, usually at greatly reduced cost.

Depending on the technology (the example here is hydroacoustic data for fish distribution and abundance), the data files include collection parameters, location, duration, and all important variables are time and location tagged so that there is no question of the data quality. In fact, within Puget Sound, the acoustic data collection could even be monitored in real-time.

In short, I would like to encourage the consideration of cooperative data collection and use of "vessels of opportunity" in support of the WDFW rockfish assessment program. Enhancement of the data collected by WDFW with complementary and comparable input from both co-managers and other concerned and cooperating entities will both enhance the data available for analysis and the commitment of a wide base of users.

Thanks for your consideration and this opportunity to comment.

Bob McClure
Business Development
BioSonics, Inc.
4027 Leary Way NW
Seattle, WA 98107
USA

Phone: 206.782.2211
Web: www.biosonicsinc.com
Skype: biosonicssales

World Leader in Portable, Digital Scientific Echosounder Technology, Training, and Consulting Since 1978

REFERENCES: Hydroacoustic assessment of rockfish.

Bottner, J.F., and S.F. Burton. 1990. Hydroacoustic stock assessment study of Washington coastal black rockfish of Washington State. Technical report (Washington (State). Dept. of Fisheries) -- no. 108.

Predicting Rockfish Locations Using High-resolution Bathymetry (http://www.fisheries.org/units/afs-ak/oncorhynchus/2008/onco284.pdf)

Comparison of submersible-survey and hydroacoustic-survey estimates of fish density on a rocky bank

REFERENCE: Cooperative data collection.

Market Squid Industry- Agency Cooperative Research and Biological Observations *in* California and the World Ocean '06 (http://resources.ca.gov/ocean/cwo06/poster_sessions.htm)

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From: Sandra Gitchell
To: SEPADesk2 (DFW);
Subject: Puget sound rockfish
Date: Wednesday, December 23, 2009 6:02:13 PM

I'm not so sure that studies are influencing the tight restrictions on fishing for rockfish. The reason i say that is, every time I fish in area 13 i catch (and release) at least 10 to 20 rock fish a day, mostly during ling cod season. That would suggest to me that the populations are very healthy indeed. I'm betting there is some kind of green agenda behing all of this crud,but all I know is the cold wet facts- There plenty of rock fish in the sound and in hood canal. The catching and keeping of them should be more liberal. If your guys need someone to show them how to put thier hands on real fish,not just second hand best guesses. my email is dsgitchell@yahoo.com I would be more than happy to educate any of your biologists.(greeners).

2-61

To: Washington Department of Fish and Wildlife (WDFW): Teresa A. Eturaspe, SEPA/NEPA Coordinator

From: Sam Wright, 1522 Evanston Ct. NE, Olympia, WA 98506 (360-943-4424, sam.wright@att.net)

Subject: Puget Sound Rockfish Conservation Plan (PSRCP)

The draft plan fails to describe the true nature of the exact conservation problem for at least five species of rockfish in the Georgia Basin: canary, yelloweye, bocaccio, tiger, and China rockfish. It needs to be extensively revised to reflect the actual situation. This is essential if WDFW is serious about adhering to the draft plan's stated intent to follow the Precautionary Approach as defined on p. 71. Since these five populations all show definite signs of depensatory mortality factors, this term and its serious implications both need to be defined in some detail. When any fish population is subjected to depensatory mortality factors, it can only decline in abundance as *increased percentages of the population are lost.* It will either be driven to extinction or will stabilize at a very low level of abundance from which it cannot recover. In the past, all determinations of depensatory mortality have been made after-the-fact (when everyone can finally agree). Likely mechanisms are failure to find mates, hybridization with other species, and increased exposure to predation risk when they leave the security of their home range to seek out mates.

Key references to consider in describing the problem are the following:

Frank, K.T., and D. Brickman. 2000. Allee effects and compensatory population dynamics within a stock complex. Can. J. Fish. Aquat. Sci. 57:513-517.

Liermann, M., and R. Hilborn. 1997. Depensation in fish stocks: a hierarchic Bayesian meta-analysis. Can. J. Fish. Aquat. Sci. 54:1976-1984.

Myers, R.A., N.J. Barrowman, J.A. Hutchings, and A.A. Rosenberg. 1995. Population dynamics of exploited fish stocks at low population levels. Science 269:1106-1108.

Peterman, R.M. 1977. A simple mechanism that causes collapsing stability regions in exploited salmonid populations. Jour. Fish. Res. Bd. Can. 34:1130-1142.

Section 2.7.9 Hatchery Practices (p. 36) needs to be completely redone since it only addresses "delayed release" hatchery salmonids and does not even mention the primary current problem for rockfish populations. Today's critical problem is massive releases of sub-yearling (age 0) hatchery Chinook that are much larger than their wild counterparts and are being released in many areas that never had significant wild Chinook populations in the past. Both of these fundamental departures from existing ecological conditions should have been subjected to review under the State Environmental Policy Act (SEPA) *before being implemented.*

The current hatchery Chinook program shows that 45.6 million sub-yearlings and 2.6 million yearlings are released annually in the Greater Puget Sound Basin. Approximately 74% of the sub-yearlings and 88% of the yearlings are released in South Puget Sound (WDFW and P.S. Treaty Tribes. 2004. Puget Sound Chinook salmon hatcheries. A Component of the Comprehensive Chinook Salmon Management Plan.). Millions of these fish are now released from rearing sites on small streams that did not originally have significant natural Chinook populations and reach marine waters in times ranging from a matter of minutes (e.g. Hoodsport Hatchery on Finch Creek) to a few hours – Tulalip bay, Grovers Creek, Gorst Creek, Chambers Creek, Minter Creek, Deschutes River (Capitol Lake), Big Beef Creek.

The *biomass* of hatchery Chinook actually reaching Puget Sound marine waters each year is undoubtedly at an all time high. WDFW and P.S Treaty Tribes (2004:4) state the following under *Ecological Interactions*: "releasing fish at a time, size, and physiological condition that provides a low likelihood of residualization and promotes rapid migration through the estuary to marine waters. Programs typically release sub-yearling Chinook salmon that are in the 40 to 90 fish per pound range (77 to 100mm fork length) during the months of May and June. Fish released at this time are expected to move rapidly through estuarine areas". The report also states that "releasing sub-yearling fish that are a larger size than natural-origin Chinook salmon of the same brood year to reduce the potential for diet overlap with any co-occurring natural-origin fish in marine waters". The report did not even mention possible adverse interactions with rockfish populations (competition and predation) from this gross departure from natural ecological processes in Puget Sound. There is no direct evidence of problems for rockfish populations because no one has ever looked for it.

The biomass of juvenile hatchery Chinook salmon reaching marine waters is at a record high because the larger fish are surviving at a much higher rate than in the past. During the massive fin-marking studies of lower Columbia River fall run Chinook in the 1960s, it was estimated that only about 30% of the fish survived to reach the estuary. This was not a dam passage problem since most of the fish were released below Bonneville Dam or in the Bonneville Pool. The primary problems were small average fish size, premature (too early) release timing and diseases – problems also common to Puget Sound in the 1960s (WDF. 1992. Salmon 2000 technical report. Phase 2: Puget Sound, Washington Coast and integrated planning.).

The plan needs to address merits of a one fish daily bag limit for rockfish because this is the current standard as well as a future option. Ever since this regulation was enacted, WDFW has touted the supposed twin "benefits" of preventing wastage of incidental bycatch and preventing targeted fishing for rockfish. The fact that people commonly fish for boat limits instead of individual limits has been largely ignored. Salmon anglers participating in the deep water down rigger fishery for blackmouth are now claiming that they seldom catch rockfish. They claim that their past rockfish catches were mainly the product of separate, targeted fishing efforts for rockfish.

The serious hooking mortality problem for salmon in the deep water down rigger fishery needs to be addressed in the plan since participants are demanding unimpeded continuation of this fishery despite their significant bycatch of rockfish. When fishing in this manner, you need to tighten down the release mechanism in order to counter the heavy drag from strong currents and snagged vegetation. Many small Chinook cannot trip the release mechanism and remain undetected until they are brought to the surface. By this time, they are either dead or will die within 6 hours due to excessive lactic acid in their bodies. State and Federal managers have been repeatedly advised of this problem ever since the ESA-listing of Puget Sound Chinook but these warnings have been ignored. In reality, the hooking mortality rate is probably closer to that experienced in the commercial troll fishery and managers have unanimously agreed that this fishery is not a viable candidate for the selective harvest of adipose marked hatchery salmon. The deep water down rigger fishery for blackmouth also has the dubious distinction of having over 90% of the Chinook (marked and unmarked) that are available falling under the current minimum size limit (WDF 1992). The fishery is not a rational choice when it is in direct competition with the regular recreational salmon fishery for fishing opportunities.

2

To: Washington Department of Fish and Wildlife (WDFW): Teresa A. Eturaspe, SEPA/NEPA Coordinator

From: Sam Wright, 1522 Evanston Ct. NE, Olympia, WA 98506 (360-943-4424, sam.wright@att.net)

Subject: Puget Sound Rockfish Conservation Plan (PSRCP)

The draft plan fails to describe the true nature of the exact conservation problem for at least five species of rockfish in the Georgia Basin: canary, yelloweye, bocaccio, tiger, and China rockfish. It needs to be extensively revised to reflect the actual situation. This is essential if WDFW is serious about adhering to the draft plan's stated intent to follow the Precautionary Approach as defined on p. 71. The NOAA Fisheries Service has only conducted Endangered Species Act (ESA) Status Reviews for 8 of the 28 known species of rockfish in Puget Sound. There have been no ESA status reviews for the remaining 20 species.

There are at least five rockfish species in the Georgia Basin with very small home ranges that have been reduced to abundance levels that are so low that many of the remaining fish will not be able to find mates for reproduction. This is the most fundamental of all possible types of depensatory mortality (also known as Allee Effects). This situation is obvious from SCUBA survey data (see four data sets attached) that show many observations of single fish. Even the groups of two or three fish can only be reproductively effective if they contain both a mature male and a mature female. While it can be argued that divers do not see all of the fish, the four species in question are all brightly colored rockfish species and are thus the easiest to see. (Note: There have been no recent observations of bocaccio.)

There is an inherent false sense of security since rockfish are capable of extreme longevity and can persist in very low numbers long after they have become functionally extinct. It might be postulated that individual fish can move far outside their very small home ranges for reproduction but there is no scientific evidence to support this. Even if this does occur, the fish would expose themselves to a greatly increased risk of predation and rockfish cannot achieve their extreme longevity by taking such risks.

For at least five species of rockfish in the Georgia Basin, it is clearly the very rare conservation problem, unacknowledged by WDFW, where every single fish becomes important and every single fish must be protected from all sources of fishing mortality. The recreational fishing regulations for marine fish in the Georgia Basin that can meet this need are the combination of a ban on retention of rockfish and limiting all fishing to inside the 20 fathom line (120 feet). For recreational salmon fishing in the Georgia Basin, the only acceptable solution would be to confine any fishing that is allowed to inside the 20 fathom line and to deeper waters with minimal amounts of rocky reef habitat. Significant salmon fishing in deeper waters (over 20 fathoms) with rocky reef habitat would simply kill the same rockfish protected by the first set of proposed marine fish regulations. The draft plan needs to be revise to reflect these facts.

The stock status (Table 7, p. 26) needs to be modified to show that five species are at a high risk of extinction due to depensatory mortality since this most serious of all possible

concerns always trumps any attempted use of the modified American Fisheries Society criteria used by WDFW (see Musick 1998 and Musick 1999). You should also explain the conflict between the Precautionary rating for bocaccio and the NOAA Fisheries Service proposal to ESA-list the same species as Endangered. This is due to a conflict between the personal opinion of Wayne Palsson of WDFW and conclusions reached by a team of NOAA Fisheries Service scientists over status of the species. The draft plan currently assumes that the former opinion is correct. If you follow the Precautionary Approach, then the opinion of the team of NOAA Fisheries Service scientists would be assumed to be correct. You also need to revise the narrative in Section 2.6 (Current Status for Rockfish in Puget Sound) on p. 24 to 27.

In addition, tiger rockfish and China rockfish need to be added to the list of Key Species of rockfish (Table 9, p. 39). You also need to revise the narrative in Section 3.2 (Analysis of Alternatives to the Suggested Policy) on p. 38-39 to reflect this addition. They were probably never as abundant as some of the other rockfish species but no one questions their long term presence as part of the Georgia Basin rockfish complex. You also need to correct the statements in Sections 2.6 and 3.2 which claim that China rockfish are found only in North Puget Sound. Small numbers appear in South Puget Sound in both the SCUBA survey data base and in 12 years of catch statistics that were published by WDFW from 1975 through 1986 (a total estimated catch of 275 China rockfish was made in South Puget Sound during the 12 year period).

There are no usable quantitative data on catches of rockfish by recreational anglers in the Georgia Basin, especially since *the daily bag limit is the first legal rockfish caught* (canary and yelloweye cannot be retained). No one is going to report more than one rockfish total (retained or released) *since that would be illegal.* In addition, it is well known by professional resource managers that you cannot get this type of information from angler interviews when they know that any such information might well be used to restrict their future fishing opportunities. Anglers in the Georgia Basin have been well aware of rockfish conservation problems for over 10 years. In this type of situation, you can only obtain valid information from onboard observations and/or test fishing – neither of which has been done (Note: I once tried unsuccessfully to quantify "shaker" or sub-legal salmon catches in the commercial troll fishery with a logbook program.). The numbers cited in Table 6, p. 24 need to be deleted and the narrative in Section 2.5.2 (Recreational Fisheries) on p. 23-24 needs to be revised.

What is known for certain is that salmon angling is a very large and popular fishery that is done primarily in deep water with down rigger gear and electronic fish finders. It is also known that the primary target of this fishery is "blackmouth" (immature Chinook salmon) that are comingled close to the bottom with rockfish – you simply cannot fish for one without catching the other. Section 2.5.2 of the draft plan needs to be revised by the addition of these facts.

The primary target of recreational salmon anglers in the Georgia Basin is ESA-listed Puget Sound Chinook salmon, which have their own strict conservation and allocation constraints. All fishing for Chinook salmon in the Georgia Basin is planned with the use of a computer model in order to stay within these specific numerical conservation and allocation values. The allocation constraint is catch sharing with Treaty Indian Tribes. The conservation

constraint is fishing rate limitations on populations of ESA-listed Puget Sound Chinook salmon. There will be *no net reduction in salmon fishing opportunities if maximum protection is provided to rockfish.* In other words, every loss of salmon fishing opportunities to protect rockfish will be counter balanced by increased fishing opportunities inside the 20 fathom line and in deeper water areas lacking significant amounts of rocky reef habitat. The factual situation described above needs to be added to the plan in Section 2.5.2.

The isolating mechanisms for rockfish populations in South Puget Sound (net seaward flow of surface waters, sill in Admiralty Inlet, constriction at Deception Pass, etc.) should be discussed in detail in Section 2.7 (Stressors and Limiting Factors) beginning on p. 27. This is especially important because NOAA Fisheries Service scientists have already determined that the South Puget Sound populations of five rockfish species (quillback, copper, brown, greenstriped, and redstripe) are Distinct Population Segments (DPSs). This is high percentage (63%) since only 8 of the 28 known species of rockfish in Puget Sound have been subjected to ESA status reviews.

A final problem with the draft plan is complete omission of some very valuable information. WDFW has possession of long-term bottom trawl logbook data and detailed maps from the F/V *Panther*. This has valuable information on distribution and abundance of the Deepwater Complex of rockfish species. It is not even mentioned in the draft plan (or Palsson et al. 2009). This information needs to be presented in a report that is available to the public, especially since it identifies key recreational salmon fishing locations that are likely to have significant rockfish encounter rates.

2463

From: Swampdog
To: SEPADesk2 (DFW);
Subject: rock fish
Date: Monday, January 04, 2010 10:36:41 PM

Dear WDFW. I belatedly realized that today is the last day for comments on the rock fish recovery plan. I know that it is after hours but i hope you still will except my comments since it is still the 4th.

I am a retired fish and wildlife worker with a degree in fisheries and zoology, and in the past I have been both a commercial and a sports fisher. At the moment i am involved in numerous salmon enhancement volunteer activities. I have a good understanding of fisheries isues.

I would like Alternative 1 or 2 to be addopted. Alternative 3 and 4 are so weak that they are meaningless and their addoption for the recovery plan would render such a plan meaningless and ineffectual. These later two alternatives would ultimately result in the extinction of rock fish in our inland marine waters.

I would like more marine sanctuaries in our inland and the elimination of bottom trawling in Puget Sound. Puget Sound is so degraded and so over worked that it would nice to have safe zones for marine life. Bottom trawling is to destructive of benthic fauna and has no place in a diminished ecosystem.

When I was young, there were commercial hake and cod fisheries in Puget Sound, but those two species are now present in numbers to small support large scale commercial endeavers. In the past the state to often placed the short term interest of sport and commercial fishers above their mandate to protect the fisheries resourses of Washington State and as a results both the fisheries and the fish have lost out.This time youn have an oppertunity to do things right. Please do so.

Please add my email and my address to the mailing lists concerning this subject and keep me informed.

Coleman Byrnes
P.O. Box 3231
Pot Angeles WA 98362
360-928-1032

2 284

Subj: **(no subject)**
Date: 11/25/2009 6:58:01 P.M. Pacific Standard Time
From: RRC6633
To: RRC6633

Dear WDFW...Commission

My name is Richard Colman. I own a home and operate a small RV park located in Sekiu, WA. I have grave concerns about the proposals set forth for the management of rock and bottom fish, particularly as it pertains to area 5.

I have represented the Clallambay, Sekiu Chamber of Commerce at the North of Falcon process for several years. I have been closely involved with at least some fishery management processes.

Understandably, I would like to address the proposals in an order that is of most importance to area 5 and our community.

Proposal 10 A....allowing spearfishing back into area 5.

I would like to first remind the commission of it's past values and policies addressing Fair Chase and Equal Opportunity.

I attended a commission meeting when the use of Robo Duck decoys were addressed. It was decided then by the commission that the Robo Duck decoys exceeded fair chase guidelines as well as giving one user group unfair advantage over another to a wildlife resource. Spearfishing falls well within both categories.

It is undisputed that spearfishing has a very distinct advantage over other sport fishing methods. It has been challenged many times in the past as far as fair chase. To swim up to a fish that is not overly afraid of you and spear it, in my opinion, does not fall into the valued guidelines of fair chase. I strongly believe proposal 10 A has more than a taint of unfair chase and certainly deserves and award for unfair advantage.

From Neah Bay to far east of Sekiu the beaches are lined with heavy growths of kelp and other seaweed. These, shore to the outer line of kelp, are virtually inaccessible to both boat and beach hook and line fishing, but, is also considered home to most all shore dwelling fish at some point and time. These kelp lines create a "natural" safe haven and spawning area for many non migrating rockfish and bottom fish, a "natural sanctuary". If spearfishing is allowed back into area 5 these sanctuaries are gone. Divers access these kelp lines quite easily and over time reek havoc on local fish populations dwelling there.

In the mid 90's we had a spear fishery in area 5. I have had many of those divers stay in my park. I have also witnessed the many ice chests of rock and bottom fish that they have harvested. These fish came from as close as Sekiu Point and all came from outer kelp line to beach . I have personally watched many of them beached at Sekiu Point, more fish than I ever realized lived there. I envied them of course, but at the same time I recognized this harvest rate would be unsustainable for non migrating fish. It also made me realize that some creative management was necessary to prevent over harvest. In those years I did communicate with the WDFW about creating sanctuaries. Possibly there is some record of this?

Spearfishing for the most part is done in a narrow corridor that is from 25 to possibly 300 feet wide along a beach, not unlike a river containing fish that do not migrate. This is very similar to gill netting in a river, but in kelp, the gill nets (spears) move. Over time, they will eventually spear them all from east to west. Most of these fish are there day in and day out over years, their entire lives. They do not try to escape, nor do they have another place to escape to.

Spearfishing is very efficient but is also very lethal, there is no catch and release option. Size limits for spearfishing is not within good logic and it is unreasonable to propose them. I am sure this good reasoning and logic was used to regulate area 4 spearfishing which is without size limits and which has served poorly.

JH 11-30

Under this pretence, if this proposal is adopted, I feel there should be at least protected areas, "no kill zones", for spearfishing for some designated distance around all identifiable rocky points and outcroppings in both areas 4 and 5. Let these become the "Divers World Class Observing Sanctuaries of Tomorrow". If this is what the diving community desires, let them create them, but not at a cost to other fisheries.

To even consider the same seasons and limits, especially size limits, is totally unreasonable and without merit. It is complete fantasy to believe that a diver can estimate the length of a Ling Cod within an inch. Then what happens when he or she makes an honest mistake of an inch, how many of those will occur? Many I am sure.

Area 4 has been totally and poorly managed for many years. The limits have been unrealistic for a sustained fishery. If the limits had been set more closely to what area 5 has had over the years, I cannot imagine how many more sea bass there would be there today.

This along with bottom and rock fish being open in between halibut days in area 4 is poorly thought out. Most people plan there halibut trip to fish halibut both days with one day in between closed. With their boats in the water they are not going to stay at the dock. Most of the entire halibut fleet goes bottom fishing. This is an artificial, high intensity, impact fishery, created by another fisheries regulation. This should be changed no matter the outcome of these proposals. The day in between halibut days should be closed to rock and bottom fishing in area 4.

Having said all of this.....to believe the closing of the western portion of area 4 and areas 6 through 13 to all bottom fishing....forcing all rock and bottom fishing into the eastern portion of area 4 and area 5..... introducing spear fishing into area 5, and then believing you can have a sustainable fishery for rock and bottom fish...with all due respect commissioners...it will not happen. In the long term this proposal is a disaster and strikes at the hearts of all user groups except site seeing divers...bless their hearts.

It appears one user group has in someway attempted to flex it's mussel. It is my hope that the commission will see through this and reject all of the current proposals as they now stand. Demand a real and inclusive rock, bottom fish management program with proposals that addresses and protects primarily resources and then all user groups.

I also believe that if prposal 10 B had been well thought out it would have been presented to the commission before, not after, the June 1st deadline.

I have 6 small grandson's. I deeply feel, from my heart, that if these proposals are accepted, and if real rock and bottom fish management is not addressed soon, they will never have the opportunity to take their sons rock and bottom fishing. What a shame on the WDFW.

I do plan to attend the meeting of Dec 5th. Hopefully I will have the opportunity to elaborate my concerns.

Respectfully,

Richard Colman

Richard Colman

RECEIVED

NOV 3 0 2009

HABITAT PROGRAM

My Initial reaction to the DEIS for Puget Sound Rockfish Conservation Plan (PSRCP)

This plan is being developed under the direction provided by the strategic policy on groundfish in Puget Sound adopted by the Fish and Wildlife Commission in 1996. It will replace or update a portion of the Puget Sound Groundfish Management Plan (PSGMP, 1998) –those sections that are exclusive to rockfish. Those portions of the PSGMP affecting other species than rockfish will remain as the agency plan on "non-rockfish groundfish". **Is this correct?**

If the geographic scope of this DEIS remains as proposed (east of Sekiu River), do the rockfish populations west of that point, out to the Tatoosh-Bonilla line, remain under the PSGMP, since those stocks are currently covered by the PSGMP, but would not be covered by the new Rockfish Conservation Plan?

Has the available 2006 Black Rockfish stock assessment findings, released last year in 2008, been reviewed to see if a change in the population status is warranted for black rockfish in Puget Sound? In this study area?

It seems like with all the rare species present and unusual density and diversity of rockfish species and individuals near Tatoosh Island, relative to anywhere else in the Puget Sound area (covered by the PSGMP), **a site in the Neah Bay portion of the Olympic Coast National Marine Sanctuary should be a rockfish recovery area.**

- **EXPAND scope of the PSRCP to be all of Puget Sound, out to the Tatoosh Bonilla Line or modify the title to reflect the reduced geographic scope.**
- What new tools or approaches are provided in the draft PSRCP which are not present in the existing Puget Sound Groundfish Management Plan (PSGMP)? **How are the new preferred alternatives different from the existing agency policy under the PSGMP plan?**
- In Puget Sound, **trawling** is presently limited to the Strait of Georgia, the **San Juan Islands, and the western Strait of Juan de Fuca. What are the target stocks? What are the bycatch concerns?** How is future lost gear addressed? (Labeled? reported lost? Recovered?)
- **Selection criteria for "key" species needs definition and review:**
- **Add China, Tiger, Yellowtail, and Vermilion rockfish to list of key species**
- Evaluate China and Tiger RF Puget Sound populations as their population levels may warrant a depleted status (allee effect: a causal positive relationship between the number of individuals in a population and their fitness.)

- **Research Objective:** Estimate baseline population location, distribution and structure for tiger and china rockfish in Puget Sound. Non-consumptive data collections.

- **Implementation objective:** Identify and protect tiger and china rockfish populations / individuals located in Area 4b, the San Juan Islands complex and South Puget Sound.

- **Unanswered: How do we protect old fat females from fishing mortality? When are you proposing to establish rockfish protection areas? What are the boundaries?**

- **Unanswered: How do we address the unintentional catch of old fat females from fisheries targeting other species?** What is the department planning to do to address this, other than establishing rockfish conservation areas?

- Researchers did not use all available data: Review data from Level 4-5 surveyors with REEF (www.REEF.org) for Washington marine waters. The REEF data are stored on a publicly accessible database. We should engage our stakeholders through using their citizen science generated information—particularly when it is good quality and of a quantity larger than we can generate ourselves. **Getting and increasing non-consumptive use is one of the goals. Citizen science can be best enabled by incorporating it into the department's implementation programs.**

- **Monitoring Program for all RF species above 120':** Monitor all rockfish species that occur at recreational depths, through citizen science efforts such as REEF. Work with volunteer coordinators to help get priority sites surveyed on an ongoing basis. Use as an opportunity to invest in citizen science and educational outreach. **Getting and increasing non-consumptive use is one of the goals. Citizen science can be best enabled by incorporating it into the department's implementation programs.**

- Contrast the approach proposed here with British Columbia's rockfish management strategy. **How is what WDFW proposing substantially different than BC's plan?** Identify the areas of divergence.

- Do harbor seals constitute a significant natural mortality on rockfish, particularly in the San Juans? **What species, size class of rockfish constitute the bulk of harbor seal prey? Is it primarily Puget Sound Rockfish, or are they consuming significant numbers of old fat females of other species also?** What % of the rockfish biomass is estimated to be annually consumed by marine mammals?

- **Up to 61,000 rockfish may be caught in derelict fishing gear per year. How is mitigating the threat from derelict fishing gear being addressed?** Are there additional stimulus dollars available for this type of habitat restoration work? How are we working to prevent future ghost nets?

Rockfish Management Challenges and reactions to questions posed by the DEIS

1. Fishery management challenge- recruitment is episodic, irregular, very successful rare event
    a. Other managed fisheries may be impacting rockfish recruitment success
        i. Hatchery "delayed release" salmonids 4 million salmon in 2005
        ii. Lingcod hatchery production
        iii. Get timing, distribution, spatial analysis; refine risk estimate
    b. Protect old fat females from non-natural mortality
        i. Estimate 'enhanced natural' from high pop of harbor seals?
2. Habitat restoration enhancement-
    a. No major **artificial** reef construction:
        i. No clear evidence of increasing as opposed to attracting existing fish
        ii. Worth considering as part of a multi-party, community supported effort
    b. focus on derelict gear removals
        i. proven killer of old fat females:
        spend $$ on protecting OFFs & preventing future ghost nets
3. **Hatchery production of rockfish**
    a. Hatchery production may have limited value augmenting existing natural populations. Raising RF past the vulnerable YOY stage may greatly accelerate RF recovery in PS.
    b. Best long term strategy is to invest in growing old fat females, habitat and prey biomass

2.1.1 Puget Sound

From the PSGMP: Groundfish resources in the inland marine waters of Washington (Figure 1, here defined as Puget Sound including all marine waters east of the Bonilla-Tatoosh Line at Cape Flattery) represent dominant members of the marine and estuarine ecosystem.

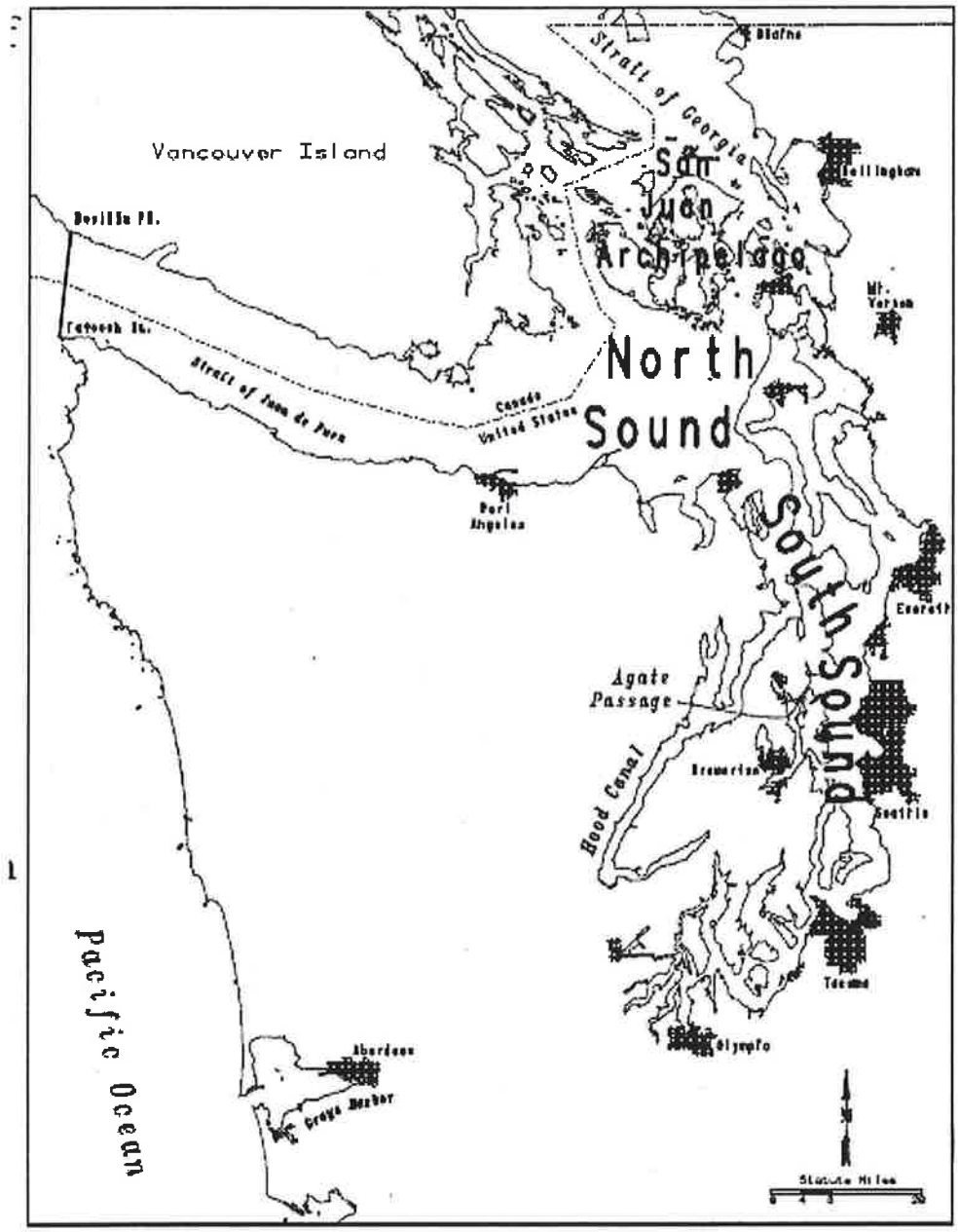

Figure 1. North and South Puget Sound.

The Biology and Assessment of Rockfishes in Puget Sound (BARPS)

September 2009, By Wayne A. Palsson:

Puget Sound includes all the inland marine waters of Washington including the U.S. portions of the Straits of Juan de Fuca and Georgia, the San Juan Islands, Puget Sound proper, and Hood Canal.

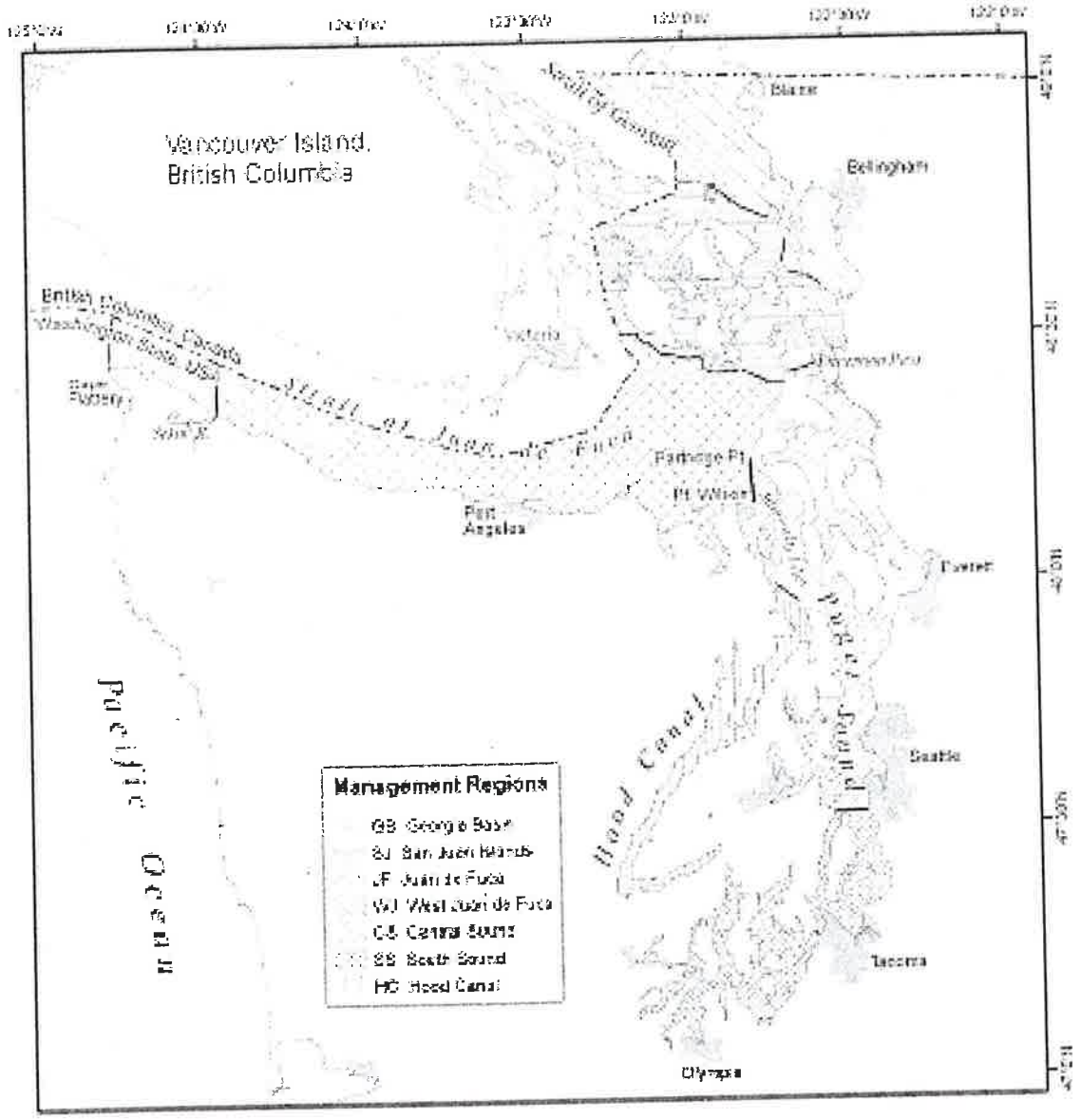

Figure 2.1. Major basins and Groundfish Management Regions of Puget Sound.

***Also at the* Appendix 5. Environmental Checklist** In this document (PSRCP) "Puget Sound" refers to the marine waters of Washington State east of the Sekiu River and south of the Canadian-United States border, including all waters south to Olympia and Hood Canal (Figure 1). Although not stated in the PCRCP (SIC), the existing Puget Sound Groundfish Plan (Palsson *et al.* 1998) considers Puget Sound in two major areas or regions as follows. North Puget Sound: Those waters of the Strait of Juan de Fuca and the San Juan Islands. **The western boundary is the Sekiu River (which is east of Cape Flattery);** ...

PUGET SOUND, INCLUDING THE STRAIT OF JUAN DE FUCA (EAST OF THE SEKIU RIVER), THE SAN JUAN ISLANDS, HOOD CANAL, ADMIRALTY INLET, THE WHIDBEY BASIN AND INNER PUGET SOUND SOUTH TO OLYMPIA. THE PLAN DIVIDES THE PROJECT AREA INTO TWO PARTS: 1) SOUTH OF PORT TOWNSEND AND 2) NORTH AND WEST OF PORT TOWNSEND

"3.2.1 Affected Environment

The affected environment for all of the policy options and alternatives includes all of Puget Sound" **??East of the Sekiu River??** ....

No, it is all of Puget Sound

c. Is the site part of a migration route? If so, explain.
PUGET SOUND IS USED FOR MIGRATION FOR JUVENILE SALMON ENTERING SALTWATER AND ALSO BY ADULT SALMON RETURNING TO NATAL STREAMS TO SPAWN. PUGET SOUND IS PART OF A MAJOR FLYWAY FOR MIGRATING BIRDS.

It is also how rockfish larvae, YOYs, juveniles and adults migrate from the outer coast to Puget Sound and vice versa. This is also true for lingcod, greenlings and other groundfish.

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November 11, 2009

WDFW SEPA Desk
600 Capitol Way N.
Olympia, WA 98501-1091

Please accept the following comments for the public record re: the Draft EIS for the Puget Sound Rockfish Conservation Plan (PSRCP) and the Draft PSRCP itself.

Comments related to the *DRAFT* EIS for the PSRCP.

In general, the *DRAFT* EIS is a good first effort. It needs clarification in certain areas, and alteration in others. Please consider the following recommendations:

1. It is unclear if a simulated capture from depth and subsequent release of rockfish is comparable to actual, in the field, capture and release. There is no way to accurately assess whether released fish are marginally impaired and thus more susceptible to predators or other, naturally occurring stressors. This caveat should be noted on p. 18 when implying little or no adverse impacts on fish taken from depths up to 33'.

2. It is unclear what management measures are currently being undertaken in the North Sound to justify placing copper rockfish in the "Precautionary Stock Status" category. (p. 26.) This implies that the Department has adopted a policy related to the species that will prevent them from becoming "Vulnerable," as they are in the South Sound. I am not familiar with a policy that protects the large, older females in the North Sound. Moreover, the Department specifically sites a study indicating that even "moderate levels of fishing" can remove older fish. (p. 28) Please clarify what prevents depletion of this critically important portion of the stock under current management prescription.

3. Please clarify why in the Department's table of species bocaccio is listed as "Precautionary" in both North and South Sound when a Federal listing of "Endangered" is proposed for bocaccio stocks in Puget Sound. (p. 26)

4. In Table 8 (p. 27) the Department assesses "Limiting Factors" for rockfish depletion and recovery. Only two are rated "High" -- past (and present?) fisheries and derelict gear. Since these are the primary stressors, it seems logical to concentrate recovery actions on these two factors. The first can be addressed thru creation of Marine Protected Areas (MPA), which the Department itself agrees can positively impact abundance and structure of rockfish stock. (p. 28) Additionally, derelict gear can be addressed in partnership with Federal programs designed to assist with removal. These are both lower cost actions for the state. Note also that the table places "Habitat Disruption" as a ***low*** stressor in Puget Sound – a good reason to avoid costly artificial reef creation. (p. 27)

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5. I support Alternative 2 under the "Natural Production" heading. (p. 40) Management for key rockfish species would almost certainly benefit a variety of other rockfish species. Consequently, it would be helpful if the Department would indicate species for which the key species act as surrogates. For instance, does focus on copper and quillback equally benefit brown rockfish? This would strengthen the case for adopting the key species approach.

6. Under "Habitat" please consider Alternative 2. I further request that under this alternative the Department ***delay any construction of artificial reefs*** until, by monitoring, it can determine whether existing high quality habitat is reoccupied by fish. Habitat disruption does not appear to be a pressing limiting factor (see Table 8, p. 27). If this is the case, a more prudent approach would be to wait and see if, with additional regulatory protections, the fish repopulate good, existing habitat. This approach would be less costly and would also be an important test of whether MPA's positively address the stock depletion problem.

7. "Fishery Management" – I fully support Alternative 1, the preferred option. ***The Department, based on its own findings and those in the literature, must adopt a science-based system of Marine Protected Areas.*** (p. 43)

8. "Monitoring, Evaluation, Adaptive Management" – I support Alternative 2. A robust monitoring program must be immediately implemented to determine the success of rockfish protection and restoration actions undertaken by the Department. (p. 47)

9. "Enhancement" – I support Alternative 3 – No Action. If after a reasonable period, perhaps 15 -20 years, monitoring of natural production demonstrates that few positive benefits have accrued to rockfish from the creation of a series of inter-related MPA's and the implementation of increased regulatory protection, then the Department may wish to undertake adaptive management to address continuing deficiencies. This may include creation of artificial reefs, in habitat poor areas such as the South Sound.

Comments related to the *DRAFT* Puget Sound Rockfish Conservation Plan (PSRCP) (Appendix 1)

1. Enhancement: Why is any form of habitat enhancement necessary? There is no mention in the plan or the DEIS of the ***amount or percentage*** of rockfish habitat that has been degraded or destroyed. Without an estimate of the percentage of habitat lost, it is not possible to weigh whether this is a necessary or advisable objective/strategy. (p. 69)

2. Enhancement: Policy Category #1 (Natural Production) and Category #8 (Enhancement) are at least mildly contradictory. Hatchery production is not only costly, it may have negative consequences as noted under action item #2, p. 69. Why would the

Department initiate a new hatchery program when existing programs, most notably salmon, are in such disrepute? The factors enumerated below militate against a hatchery "solution" to the rockfish problem.

a. ***Costly*** – This is an especially ill-advised undertaking in a poor economic climate.

b. ***Long-term*** – A focus on a hatchery approach for the very long-lived yelloweye and canary rockfish locks the Department into a decades long program. Testing a "natural production" model, on the other hand, is relatively inexpensive, initially requiring only the establishment of Marine Protected Areas (MPA) and a rigorous monitoring program. Adaptive management may be required later if monitoring indicates that yelloweye and canary rockfish do not respond well to the model. Using hatcheries as a first order strategy, however, is not only costly, it vitiates an understanding of how depleted stocks respond to full protection in MPA's. Essentially, it precludes an accurate assessment of the effectiveness of protected areas.

c. ***Potentially harmful*** – The introduction of disease vectors or genetically impaired/modified fish into a naturally reproducing population is potentially very risky. Natural production is far preferable.

d. ***Unnecessary*** – The existence of a small but viable reproductive base should ultimately yield recovery at little or no cost, if an adequate system of Marine Protected Areas (no fishing zones) are established. If MPA's are, over time, proven incapable of recovering species, adaptive management can be used to test other alternatives.

3. Habitat Protection and Restoration: While enhancing the effectiveness of the HPA process is laudable, it is currently almost impossible to overcome developmental and "property rights" pressures. If this were an achievable strategy, it would have been previously accomplished. (p. 62.)

4. Habitat Protection and Restoration: What actions will be taken "…to reduce the incidence of new derelict fishing nets"? (Action item #3, p. 62)

5. Monitoring, Evaluation and Adaptive Mgmt: Action item #1 speaks of a "…system of rockfish recovery areas…" while action item #5 acknowledges the need to "develop a network of marine protected areas." Are these the same action or are they different? If they are different, how do they differ? If they are the same, uniform nomenclature should be used throughout the document or a statement inserted that they are used interchangeably. (p. 64; p. 66)

6. Monitoring, Evaluation and Adaptive Mgmt: Under action item #1 the Department expresses the need for a "...network of linked areas of good rockfish habitat where fishing is prohibited or greatly restricted..." The Department is well aware of the critical importance of large, old, breeding females in the recovery of most rockfish species. Taking these large, old fish can have devastating consequences for species recovery. The Department is also aware that, within a recovery area (MPA), it is not possible to have a targeted fishery for unprotected species without putting rockfish at risk. (See #5, p. 59.) Given this, why doesn't the Department simply state that fishing ***will be prohibited*** in a rockfish recovery area or MPA? ***Anything short of this prohibition is largely unenforceable and compromises achieving the goal of rockfish recovery.*** (p. 66)

7. Monitoring, Evaluation and Adaptive Mgmt: The Department is well advised to incorporate all programs and groups listed under action item #3 in forwarding monitoring goals. (p. 66) The assistance of these groups can also be used in the educational process, as mentioned in action items #4, 6, & 7 on p. 68. Further, when MPA's are established, organized angler clubs, non-governmental organizations, and private citizens need to cooperate fully with WDFW enforcement officials to make certain that the closures are honored by all.

8. Outreach and Education: Given declining Department budgets and personnel, how does staff propose to accomplish action items #3, 4, and 6? While the actions stated are commendable, it is difficult to see how they will be accomplished with fewer staff. (p. 68)

9. Natural Production: Under action item #2, what does the Department propose? If the only practical alternative to accomplishing this is to establish MPA's, why not state that?

10. Habitat Protection: The Department is correct in citing water quality as a habitat issue. However, in its efforts to restore vulnerable or depleted stocks, the Department should focus its restoration efforts in existing high quality waters. State government, including the Puget Sound Partnership, is ultimately responsible for improving water quality throughout the Sound. Given the Department's limited ability to improve degraded waters by exercise of its mandate, it needs to concentrate its limited resources in areas where it is most likely to achieve significant, positive responses for rockfish.

11. Fishery Management: This is the arena in which the Department can have its most positive impact for rockfish recovery, and this is where it needs to focus. Staff correctly identifies the current predicament in which three species of rockfish will be Federally listed and other species are either vulnerable or depleted. "These declines have largely been caused by historical fishing practices..." (p. 56). If this is the cause of the problem, this needs to be the focus for the solution.

A common message runs throughout the several Policy Categories delineated in the PSRCP:

a. Action item #1 (p. 61) – "Develop a science-based system of rockfish recovery areas that…is of sufficient size for rockfish movements…"

b. Action item #4 (p. 62) – "Develop a science-based system of rockfish recovery areas…"

c. Action item #1 (p. 63) – "In fisheries where rockfish are captured incidentally…implement regulations to reduce this…by a combination of gear, depth, time, ***and area restrictions***."

d. Action item #2 (p. 65) – "Develop a science-based system of marine protected areas."

e. Action item #1 (p. 66) – "Develop a science-based system of rockfish recovery areas."

f. Action item #3 (p. 67) – "Develop…models to evaluate…rockfish recovery areas as well as the risks involved."

The Department has correctly identified the tool that must be used to address years of inappropriate fisheries. The Department must move forward and establish sufficient Marine Protected Areas (***no*** fishing zones) to accomplish the goal of rockfish recovery. To do less will invite further decline of rockfish species and legal action to reverse this decline.

Thank you for the opportunity to comment on the Draft EIS for the PSRCP and on the Draft PSRCP itself.

Sincerely,

Dr. Fayette F. Krause
2315 Madonna St.
Pt. Townsend, WA 98368

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COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

FOR PUGET SOUND ROCKFISH

NAME DAVE ROONQUIST TELEPHONE (360) 582-1300

ADDRESS 43 E EMERALD FOREST LN SEQUIM WA 98382

E-MAIL DROONQUIST@GMAIL.COM

COMMENT:

DRAFT EIS IS TOO BROAD WITHOUT SIDEBOARDS THAT PROTECT THE ECONOMIC AND RECREATIONAL INTERESTS INVOLVED IN THE RECREATIONAL FISHING COMMUNITY.

THE DRAFT TIMELINE IS TOO TIGHT (30 DAYS) FOR ADEQUATE REVIEW AND NEEDS TO EXTENDED AND REVIEWED (AGAIN) BEFORE BEING PRESENTED FOR ANY FINAL ACTION.

QUESTION ON HOW THE PLAN MESHES WITH OTHER ESA LISTED SPECIES (CHINOOK, STURGEON, ORCA) AND THE PUGET SOUND RECOVERY PARTNERSHIP PROJECT.

NO DISCUSSION OR LIMITED DATA ON NATURAL ISSUES (BIRDS/SEALS) PREDATION; GHOST NETS; COMMERCIAL (INCLUDING TRIBAL) IMPACTS. NEED TO HAVE A COMPREHENSIVE PLAN FOR REVIEW NOT PIECE-MEALED

USE REVERSE SIDE IF MORE SPACE IS NEEDED

Email - please copy and send to me

Dave

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COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

FOR PUGET SOUND ROCKFISH

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NAME Frank Betrozoff TELEPHONE (360) 459-0210

ADDRESS 452 Kinwood St SE Olympia, WA. 98503

E-MAIL FBetrozoff@gmail.com

COMMENT: President Capitol City CCA

1. Follow CCA's position statement on the Draft Statement.
2. the closure statement as outlined, How will that impact Salmon Fishing in the closure area?
3. It would make more sense to close netting in these area's. the business of selling Fishing gear won't be hit as bad with the net closure.
4. We, CCA have helped removing the 3,000 nets that are ghost Fishing in those areas of the sound.
5. Wouldn't it be smart to wait and see if removing the nets will impact ground Fish Recovery?
6. my personel view (not CCA) is that the timing is bad For this statement to come out because their are things being worked on that will improve ground Fish For the Future. One is taking care of all the ghost nets and the other is building Artifical Reefs that is in the planning now.

Frank Betrozoff

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WASHINGTON FISH AND WILDLIFE COMMISSION 9

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PUBLIC TESTIMONY FORM

Complete a separate Public Testimony Form for each item on which you will provide testimony. In order to testify, you MUST submit your completed form to the Fish and Wildlife representative at the registration desk **prior** to the start of discussion on that agenda item.

MEETING DATE: 4 Dec 2009 **AGENDA ITEM NUMBER:** Rockfish Plan

NAME (*Please print clearly*): Laurence A Bucklin

ADDRESS: 5002 86th Ave Ct. W
University Place WA 98467

IF YOU ARE TESTIFYING ON BEHALF OF AN AFFILIATION, PLEASE IDENTIFY WHICH ONE:

N/A

PLEASE SUMMARIZE THE MAJOR POINTS OF YOUR TESTIMONY:

This "Plan" has been 2 yrs in development yet has a dearth of facts. It has a lack of science, lack of specific actions and factual errors. Food web is listed as Moderate Stressor yet past fishing as High. We should be dealing w/ current stressors! The 2002 Rec Harvest report had 6333 rockfish harvested in PS. Using WDFW data the new 15000 seals in PS consume up to 1,839,600 rockfish per year & that does not include sea lions. Plan cites ~ 35,000 recreation encounters per year (2002-2009) yet staff has been unable/unwilling to provide underlying data. Recommendation: complete public input then turn all info to Advisory Group to develop real draft plan then run it through the public review prior to final plan.!!

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Whatcom County Marine Resources Committee
322 N. Commercial St., Ste. 110
Bellingham, WA 98225
Phone: 360-676-6876
Fax 360-738-2468
Website:www.whatcom-mrc.whatcomcounty.org

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Teresa Eturaspe, SEPA/NEPA Coordinator
Washington Department of Fish and Wildlife
600 Capitol Way N
Olympia, WA 98501-1091

December 4, 2009

Dear Ms. Eturaspe:

Thank you for the opportunity to comment on the draft Puget Sound Rockfish Conservation Plan (PSRCP), recently released by the Washington Department of Fish and Wildlife (Department). The Whatcom County Marine Resources Committee (WCMRC) was established by the Whatcom County Council in 1999 to protect and enhance the local marine resources and contribute to the protection of the marine environment of the Northwest Straits. The overarching goal of the MRC is to protect and restore the marine waters, habitats and species of the Northwest Straits region to achieve ecosystem health and sustainable resources use. The WCMRC has reviewed the draft PSRCP, and offers these comments.

Policy Category: Monitoring, Evaluation and Adaptive Management
We recommend adopting Alternative 1 of the Draft Environmental Impact Statement (DEIS), with all rockfish populations monitored and evaluated. Of the seven species of rockfish recognized as key in the plan, only the Puget Sound rockfish is identified as having an important ecological function. Due to the variability in rockfish species and the limited data regarding some species' range and life history, the MRC recommends taking a conservative and precautionary approach to monitoring and evaluation. With this said, we understand the current financial limitations faced by the Department and the improbability of focusing on all species. We recommend placing an emphasis on the priority species, while searching for avenues to include all species in monitoring and evaluation.

Policy Category: Research
We recommend adopting Alternative 1 of the DEIS. All rockfish populations should play a role in new research aimed at understanding the biology and ecological functions they play in the Salish Sea. As mentioned in the previous policy category, the WCMRC recommends the more conservative and precautionary approach of including all species in research strategies and actions, while placing emphasis on the priority species.

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Policy Category: Outreach and Education
We appreciate the commitment of the Department to work with local Marine Resources Committees as a way to increase citizen involvement in the protection of rockfish in Puget Sound. The WCMRC recommends a greater emphasis on active outreach efforts, versus more passive techniques like website and sportfishing rules pamphlet education. Although these are excellent techniques to reach some sport fishers, they do not reach the larger population. We recommend developing additional outreach programs with dive shops, fish charter companies, and tackle shops.

Policy Category: Enhancement
We believe a better use of limited funds would be for enforcement and habitat protection in an effort to protect naturally produced rockfish, not in hatchery production. However, we acknowledge the Department's intent to produce rockfish for conservation efforts, not to increase fishing opportunities. Two questions regarding hatchery production are:

- *"Both hatchery and artificial habitat activities will be conducted in accordance with existing agency policies."* Are these policies pre-existing, or does the Department plan to simply adopt salmon hatchery policies? Rockfish hatchery production should not be considered equivalent to salmon hatchery production in regards to agency policies.
- What trigger will the department use to discontinue hatchery rockfish production? Once the state has invested large amounts of money and infrastructure into producing hatchery rockfish, a strong policy will need to be in place to discontinue if and when the program has achieved its objectives.

We recommend including a genetic component to Action 2. We are concerned that a hatchery program may diminish the genetic diversity of the existing rockfish populations. Again, money spent towards protection of existing stocks is a better option than implementing a hatchery program that may impact the fitness and genetic diversity of rockfish.

We acknowledge the considerable time and energy that has gone into crafting this document, and appreciate the numerous good aspects of it. Thank you for your careful consideration of our comments and recommendations.

Andrea Olah

Andrea Olah, Chair, WCMRC
On behalf of the WCMRC

Theresa A. Eturaspe
SEPA/NEPA Coordinator
600 Capital Way North
Olympia, WA 98501-1091

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December 18, 2009

RE: Puget Sound Rockfish Conservation Plan DEIS

Dear Ms. Eturaspe:

As a boat owner living near the Straits of Juan de Fuca I am in favor of a PSRCP that includes a large number of marine reserves with adequate areas. Although it will be a sacrifice the reserves should be "No Take" reserves for all who take fish. The "No Take" should include recreational, commercial and tribal fishing.

It is critical that all of us participate in restoring eco-systems for rock fish based on good science not politics as usual.

Please give this letter your consideration.

Sincerely,

Janet Marx

Janet Marx
112 Lockerbie Pl
Port Angeles, WA 98362
Janetmarx_76@msn.com

JH

14

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Re: Draft Puget Sound Rockfish Conservation Plan

WHERE DO I BEGIN? Although the negative economic impacts of the proposed closure may be as important as the direct effects, I am limiting my discussion to the direct effects.

I am in favor of protecting the "threatened or endangered" species, which in this case, are namely yellow eye, canary, and bococcio, and establishing more marine protected areas, but I'm not in favor of the proposed closure.

Although not a random sample poll by myself, my 40+ years of salmon and bottom fishing in Puget Sound and the eastern portion of the Strait of Juan de Fuca may just qualify me to speak as one. In that time period, I have not caught one canary or yellow eye here, a few bocaccio, and once during the El Nino years, a tiger rock fish. Yet, during this time period, I have caught many, many bottom fish. Friends have said that without limit restrictions, I could supply Anacortes with all the bottom fish it needs. But, I honor the limits and I'm passionate about the fun.

My observations: Yes, yellow eye, canary, and probably bocaccio have small populations. Bargmann certainly has a better reporting perspective than I do, but since recreational fisherman do not report rockfish catches, where does the 300+ canary rockfish annual catch come from? I have found ling cod, copper and quillback rockfish, and cabezon in plentiful supply. When bottom fishing, rarely do I not catch a legal ling and a rock fish given one hour of fishing. My salmon fishing usually also results in small ling, copper or quillback, and/or sole incidental catch which are returned as quickly as possible.

Rockfish are regular meals for almost everything except killer whales. So, below I've listed my opinion of the greatest effects on rockfish populations from least to most.

1. Eagles and seagulls take small disabled rock fish on the surface.
2. Recreational fisherman take a small share of rockfish, but a greater proportion of legal ling cod.
3. Feeding upon rockfish by the voracious ling cod is substantial, and allows them to grow as fast as they do.
4. Seals and sea lions do their damage daily in and around area islands, bars and kelp beds.
5. Derelict nets, Indian and commercial fishing virtually annihilate the populations in the area they are fishing. For years, from my house near Mukilteo, I watched Indian net fisherman often times leave their nets which ran from shore out 400 feet or more for several days at a time due to weather or? Only to come back and find most everything in it DEAD: sole, rockfish, steelhead, salmon, crab and other species. My conclusions here are that if the new statewide regulations for 2010-12 call for a zero rockfish catch, then any success depends on including my #5 in the restrictions. We can't control #1, #3 or #4. However, I strongly feel that the proposed regulations are unnecessary as written.

Instead, the recreational rockfish season could be reduced further and net fishing within Puget Sound should be eliminated entirely or severely restricted.

I also think it's important to look at the impact of the past timing of limits and season changes. About the time when the ling cod season was closed, the rockfish limits were severely cut from 5 or 6 to a one fish limit. In many respects, this was a good thing; less rockfish could be legally taken by all but commercial and Indian interests. Charter fisherman no longer detoured early to bottom fishing with these changed limits and seasons. The unstated result, however, was that just when the rockfish populations were at their lowest, ling cod were given open season on them! AND, the ling cod

VJH 12/17

population came back rapidly while the rockfish populations remained lower. It's only been in the last 5+/- years, after the ling cod season was reopened and recreational fisherman again began targeting them, that in fact, the rockfish populations have rebounded.

With respect to a balance and total populations of ling cod and rockfish, again I'm concluding that the rockfish limit should remain at one daily while the season could be shortened and the ling cod limit of one, with the current 5/1 – 6/15 season, should remain the same. AND, of course any threatened rockfish species caught should be carefully returned, pricking a minute hole in the air bladder if necessary (controversial but, effective I believe). The net fishing in Puget Sound needs to be eliminated or seriously curtailed.

Craig A. Cooperstein
537 Spokane Drive
La Conner, WA 98257

15

From: Hank Lounsbery
To: SEPADesk2 (DFW);
Subject: Rockfish recovery plan
Date: Wednesday, December 09, 2009 11:08:18 PM

I highly concerned and opposed to the Rockfish Recovery Plan submitted by WDFW. The plan has many significant omissions and lacks good science for proposed actions that would significantly affect recreational/sports fishing for many years.

First, the plan places all of the responsibility on sports fishers, whom have a relatively small impact on rockfish. It seems to assign the greatest responsibility for their decline on this group, but minimizes or omits factors, such as the increase in seal population, pollution, tribal drag nets, and the impact of 'ghost' or lost nets.

Your department takes no credit for previously mismanaging the resource.

The plan fails to give adequate consideration to the improvement of
rockfish habitat by adding over 600 acres through the removal of 'ghost'/lost nets. Further the plan does not adequately consider the increased habitat through the implementation of artificial reefs, as proposed by Mr. Bear Holmes and his associates. These reefs would add nursery areas that would increase the rockfish populations.

The plan fails to adequately consider the predation by seals- the largest impact on rockfish. Nothing is offered to reduce such predation.

The plan would close ~20% of Puget Sound to sports fishing through proposed Marine Protection Areas and a depth limit of 120 feet; basically closing down some of the most productive salmon fishing areas. This plan does not offer appropriate consideration for the economic and iconic value of salmon. The economic effect would be significant. It is completely unfair, capricious and unethical.

The plan doesn't adequately consider the Tribal drag net operations effects on rockfish mortality.

WDFW has the proven ability to reproduce bottom/rockfish at their hatcheries yet this was not given adequate attention in the plan.

With so many shortcomings, I am opposed to the plan as offered. It needs further changes to consider all the factors; after revision it should then be presented to the public for comment, and with a longer comment period.

Sincerely,

Henry K. Lounsbery
Oak Harbor, WA 98277

PEOPLE FOR PUGET SOUND

pugetsound.org

January 4, 2010

1

Washington State Fish and Wildlife Commission

600 Capitol Way N.

Olympia, WA 98501-1091

RE: Rockfish Management Plan Draft Environmental Impact Statement

Dear Commissioners,

Please accept these comments on the draft environmental impact statement for the Rockfish Management Plan from People For Puget Sound.

People For Puget Sound is a nonprofit, citizens' organization whose mission is to protect and restore the health of Puget Sound and the Northwest Straits.

First, People For Puget Sound applauds the Department of Fish and Wildlife for recognizing the severely depleted nature of rockfish populations throughout Puget Sound and offering the draft plan and EIS as a first step in recovering rockfish populations as a key piece of the Sound's biodiversity. We offer these comments as a way to emphasize efforts on recovery realizing that a long history of resource extraction has come and gone where the fishing public has affected decision making without due consideration of the larger public benefit or the ecosystem which sustains our Sound. Moreover, the unique challenges posed by rockfish as a species group for management have not been adequately addressed by the Department leading to their depleted status.

Identified alternatives in the Draft EIS present a false choice, because the grouping of environmentally sustainable and prudent management actions with more dubious "engineered solutions" such as artificial reefs and hatcheries leaves no clear way to separate those philosophically different choices.

Consideration of artificial reefs for the purpose of rockfish viewing could be construed to be supported by a reasonable number of comments from the scoping process, however, the only comment addressing rockfish hatcheries was an explicit comment to reject that strategy. Meanwhile, the greatest number of comments focused on considering climate change and none of the alternatives expressly identify a strategy for doing so.

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Selection of a range of actions from the four alternatives to address each policy category in Table 3 is appropriate, however, the mixing and matching of actions compiled to develop a preferred alternative is inconsistent. Some actions address all rockfish species, while others only some. This will lead to confusion and will complicate implementation.

Specific recommendations on Table 3 are as follows:

Natural Production – Alternative 1 is preferred over Alternative 2. History is replete with single species management regimes that fail to acknowledge the complexity of the food web and interconnectedness of predator and prey species, habitat, climate variability and other factors that affect populations of those target species. The Puget Sound Partnership is advocating a more comprehensive ecosystem based management approach in the Puget Sound Action Agenda and this rockfish recovery plan should be consistent with that overall direction for Puget Sound recovery.

Habitat – We agree that the complexity of rockfish life history may require that habitats other than the rocky habitats occupied by adult rockfish be protected and restored.

Fishery Management – We agree that in the spirit of our comment on Natural Production, this approach is consistent with an ecosystem based management approach to Puget Sound recovery.

Ecosystem – Alternative 1 is preferred over Alternative 3. As per our general comment above, the role of all rockfish species, their habitat and water quality requirements and predator prey relationships must be understood and addressed strategically and comprehensively. There is no detail in the plan as to what would constitute an "opportunistic activity", how that would be triggered and how those actions would be reported within the accountability framework of the Puget Sound Action Agenda.

Monitoring, Evaluation and Adaptive Management – Alternative 1 is preferred over Alternative 2. There is no indication in the plan as to which species are considered "key" and how unmonitored species populations will be known as to their continued health or whether any ongoing actions are having an effect. Because rockfish species are so long-lived, the monitoring and adaptive management plan could include a rotational data collection design that would focus on small groups of co-located species each year.

Research – Alternative 1 is preferred over Alternative 2. As with the above comment, determination of key species is problematic. The research component should be incorporated into the Monitoring, Evaluation and Adaptive Management plan once research gaps are fully identified.

Outreach and Education – We agree that Alternative 1 is preferred. However, the outreach messages should not only focus on the value of rockfish populations intrinsically, but also the unique life history and management challenges that require such bold action within this plan to avoid potential listing as threatened or endangered species. The long lived nature of most rockfish species, long period of recruitment, the increasing fecundity with age, susceptibility to mortality as bycatch from other managed fisheries, complexities of their life history beyond adult rocky habitats and site fidelity that puts them at risk for overfishing are not generally known by either the public or many in the fishing community. Emphasis on these messages will be necessary to gain the constituency for any eventual fisheries restrictions or establishment of marine protected areas.

Enhancement (Artificial Reef and Hatchery Production) – None of the Alternatives are acceptable. Any enhancement of rockfish populations through artificial reef creation, hatchery production or any other means is not scientifically supported at this time. Within the monitoring, evaluation and adaptive management framework, the department should conduct a risk assessment of these activities in context of whether existing natural habitat is determined to be limiting or populations of any single species is determined to be critically low and in danger of extinction without intervention such as artificial propagation. This risk assessment should also include a review of existing fishery management rules and their enforcement such as an insufficient number, size or arrangement of marine protected areas that prevents species recovery. In order to accommodate the scoping process comments on the need for underwater parks and marine protected areas, it seems these stem from the recreational dive community's desire to observe rockfish in the wild and should be considered within the framework of the habitat and education and outreach policy categories above and not consider enhancement for that purpose. To do so would also require integration with the Ecosystem policy category.

As a matter of practicality, People For Puget Sound understands the extraordinary sensitivity of the fishing community to establishment of new Marine Protected Areas on natural habitat that is currently fished, especially with the Fish and Wildlife Commission. However, there seems to be fewer objections to designating new artificial reefs as MPAs. While the enhancement policy category is offered within this plan as a matter of political expediency, it should not be considered without first exhausting the existing authorities the department and the commission have currently or the enhanced potential to manage rockfish populations better in concert with stakeholders that could be afforded once other elements of this plan are fully implemented.

In conclusion, People For Puget Sound is calling on the Fish and Wildlife Commission to uphold their own policy to make fisheries management decisions based on good science and when good science is absent, to take a precautionary approach. In this case the level of scientific knowledge of rockfish populations, biology and threats is insufficient to allow any directed harvest in Puget

Sound, especially in the area from Sekiu River to Tatoosh Island where remnant populations and diversity may still be sufficient to help repopulate depleted areas. We also urge the Commission to take all precautions to minimize by-catch of rockfish from other fisheries and to close them if suitable methods do not exist. Lastly, we must maximize our opportunities to learn from each incidental take and to not get distracted by futile efforts such as hatchery production and artificial reefs.

I have been selected to serve on the Department's Rockfish Advisory Committee and will continue to engage with the recreational and charter fisheries stakeholders and others to find workable solutions. However, the time is now to take a stand for these fish species because allowing their extirpation within Puget Sound would be a terrible legacy for this Commission and for our generation.

Sincerely,

Doug Myers

Director of Science

Wild Fish Conservancy

NORTHWEST

SCIENCE EDUCATION ADVOCACY

Comments on the Draft Puget Sound Rockfish Conservation Plan and Draft Environmental Impact Statement

Submitted to WDFW SEPA Desk (Teresa A. Eturaspe, SEPA/NEPA Coordinator) and the Washington Fish and Wildlife Commission

January 4, 2010

Wild Fish Conservancy appreciates the opportunity to provide comment on the Draft Environmental Impact Statement for the proposed Puget Sound Rockfish Conservation Plan. We address our Comments primarily to the Conservation Plan itself and secondarily to the alternatives identified and discussed in the DEIS as they relate to issues identified in the Plan.

First of all, we appreciate the clear recognition that "[r]ockfish in Puget Sound are in trouble" (Introduction, Appendix 1, page 56.[1]). Populations of all species known and believed to be native to Puget Sound have declined precipitously relative to observed and estimated abundance in the late 1970s which had already been reduced from historic levels. A critical aspect of the recent decline has been the simplification of the age structure of most, if not all, rockfish stocks, most importantly the loss of older, larger females. We also appreciate the clear identification of past overfishing and current fishing impacts as primary causes of the severe decline, and the clear identification (page 57) that rockfish recovery will require decades.

The combination of severely reduced numerical abundance and biomass, loss of older age classes, especially older mature females, in most, probably all, stocks, generally slow growth, age-at-maturity generally greater than 8 – 10 years, and highly variable recruitment makes it clear that conserving and recovering Puget Sound rockfish populations will require a multi-decades-long process during which it will be critical to protect all populations from exogenous, especially anthropogenic, sources of mortality.

Goal of the Plan

The goal of the Plan is stated in general terms as "to restore and protect our natural heritage of Puget Sound rockfish populations" and "to increase the abundance,

[1] Page references are to the DEIS.

distribution, diversity, and productivity of rockfish" to "help restore the Puget Sound ecosystem..." (page 60). These are laudable generalities. But the Plan should state with greater specificity and clarity what needs to be achieved quantitatively in order to realize such a vague and general goal.

In order to provide a better and more quantitative context for identifying recovery goals for the Plan, and to provide a practical and useful framework for state rockfish managers to follow in developing detailed regulations, we recommend that the goals be more directly aligned with the requirements of National Standard 1 of the (Magnuson-Stevens) Sustainable Fisheries Act (SFA). National Standard 1 specifies biological limits and targets for identifying marine fish stocks as overfished (depleted) and for determining targets levels of abundance and associated timelines for rebuilding depleted stocks. Many Pacific West Coast rockfish stocks have recently been identified as depleted by the Pacific Fisheries Management Council and rebuilding plans consistent with National Standard 1 have been or are being developed. The PSRCP should be consistent with these plans in regard to biological standards and timelines.

In fact, viewed from the perspective of the SFA and National Standard 1, many Puget Sound rockfish populations were overfished and depleted prior to 1998 when the PSGMP was developed. National Standard 1 establishes a clear biological criterion for identifying a stock as depleted or overfished. In general, it establishes Bmsy as the threshold abundance below which a fished stock should not be allowed to go. Bmsy is the biomass or numerical abundance that will produce on average, with at least 50% probability, the maximum sustainable yield from the stock. The Standard identifies this level as a minimum limit threshold that should never be crossed and requires that fish stocks actually be managed for "optimum yield" (OY), which is defined as based on maximum sustainable yield as it is reduced by consideration of economic, social, and ecological factors, especially ecosystem considerations. Any undepleted (i.e., healthy) stock that falls below Bmsy is required to be managed to return it to at or above Bmsy within one or a few years.

The Standard also requires that a minimum biomass threshold Blim be identified for each stock such that whenever a stock falls below its Blim, it is identified as "depleted" or "overfished" which then triggers a requirement to develop a rebuilding plan. The minimum default level for Blim is one-half of Bmsy and in general Blim should be greater than this level, based on knowledge of the specific stock and/or its basic life history. When a stock does become identified as depleted it must be rebuilt to at least Bmsy within a specific period of time. A minimum rebuilding time under no fishing Tmin must be identified and the maximum permissible rebuilding time Tmax is then identified as ten years or as Tmin plus one generation time (GT), whichever is greater.

We recommend that the Conservation Plan clearly specify minimum rebuilding targets for all key rockfish species, including identifying Bmsy, Blim, and Tmin for each. At the very least the Plan should clearly state that a priority objective for the immediate future will be to identify rebuilding targets and timeframes consistent with NS1 and with the ESA when specific stocks are listed by NMFS. This is particularly important given the

significant rates of rockfish incidental catch and associated mortality that limited Department data describe.

We also note that the definition of "healthy stock status" is inconsistent with National Standard 1. In the Plan, a healthy stock is vaguely defined as "one that is stable or increasing and at, or, above, historic levels of abundance"[2] (page 59). In the DEIS, this definition is qualified by additional, quantitative, language: "For healthy rockfish stocks, the reproductive biomass must be at least 50 percent of the biomass which produces the maximum sustainable yield (Bmsy)" (page 24). **In other words, the DEIS identifies a stock as "healthy" if it is at the Blim, the default threshold biomass level for determining a stock to be depleted (and hence in need of immediate rebuilding) under NS1.** While it is appropriate and necessary that such key concepts and definitions as "healthy stock" be rendered quantitative whenever possible, this definition seems clearly inappropriate and insufficiently risk-averse. We recommend that the criterion be revised upward and that a stock be required to be above Bmsy or some reasonable proxy thereof in order to be classified as "healthy".

It is worth noting that Section 3.3.1 (Natural Production) of the DEIS (page 40) contains a description of healthy rockfish stocks that is more biologically and ecologically appropriate than the two "definitions": "sufficient abundance, productivity, age, and spatial diversity to maintain populations through environmental fluctuations, climate change, and prolonged periods of low reproductive success. Another goal is to provide an increased number of larger, older rockfish in Puget Sound." We recommend that this characterization be developed into a quantitative definition of "healthy stock" and all stock classifications revised in light of this, with one proviso. The reference to increasing the number of larger, older, rockfish is implied to be a separate goal distinct from stock health. On the contrary, it is directly relevant to the health of all rockfish stocks and is particularly relevant to the ability of populations to maintain themselves through environmental fluctuations and periods of low recruitment. It should therefore be incorporated directly into the characterization of a healthy stock.

We also recommend that the Department request that the State Attorney General's office determine the extent to which provisions of the SFA and National Standard One applies to the management and conservation of Puget Sound rockfish and otherwise advise the Department as to the appropriateness of insuring that the Conservation Plan is consistent with National Standard One.

Key rockfish species and stocks

We support the reasoning underlying the identification of certain rockfish species as "key species" for purposes of developing the PSRCP and monitoring the success of its implementation. However, we recommend that tiger and china rockfish be added to the list due to their historic presence in both North and South Puget Sound.

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[2] This implies that the historic level of abundance is known and known to be biologically appropriate for defining a stock as "healthy". Such information should be provided in the Plan for all stocks that are classified by WDFW as "healthy".

We also do not believe that the use of key species/stocks should be part of an alternative apart from the "most conservative" alternative. Its primary justification is logistic, having to do with the challenges and costs of monitoring rockfish populations. It is reasonable to focus monitoring on a subset of rockfish species that represents the ecological range of the total population complex. But that should not be an excuse for not adopting Alternative 1 (Most Conservative) for all policy categories, except Enhancement about which we have serious concerns (see below).

Conservation plan policy categories

Natural Production. We strongly support the primary objective.

Under "strategies", we recommend that strategy #1 be stated with greater detail. Age- and size-structure of Puget Sound rockfish stocks have been severely simplified, an inevitable product/byproduct of past overfishing. This has been clearly documented in recent peer-reviewed literature. See, for example, the excellent review by Hutchings and Reynolds 2004. See also Baskett et al 2005 and Enberg et al. 2009. Rebuilding a more natural and diverse age structure in Puget Sound rockfish populations is critical to their conservation and recovery. Specifically, recovering older age classes, especially among females, is especially critical in view of the disproportionate increase in reproductive output and reproductive success of older, larger females. This feature of recovery alone demonstrates that rebuilding the abundance, biomass, and ecological resiliency of rockfish populations will require a sustained multi-decadal effort.

Related features of rockfish rebuilding that should be addressed in the Plan include:

1. The high likelihood that even low levels of fishing mortality can prevent rebuilding of severely depressed marine fish stocks, especially demersal and benthic fishes (see Hutchings and Reynolds, 2004 for discussion of this and for additional technical, peer-reviewed references; and Baskett et al 2005 for discussion of how harvest mortality on long-lived marine fishes can select for smaller size/younger age at maturity).

2. The genetically effective population size of highly fecund marine fish species, including rockfish, can be expected to be two or more orders of magnitude lower than census sizes. This is true even of truly healthy populations (biomass above Bmsy). The ratio of Ne:Ncensus can be expected to be even lower for depleted populations whose breeding population is over-represented (relative to natural, evolutionarily optimal conditions) by smaller, younger females that experience even lower and more variable reproductive success than larger, older, more fecund females (see, for example, Turner et al 2002).

3. The possibility, indeed the likelihood, that many individual populations, are experiencing depensatory mortality, further exacerbating low or negative population growth rates. Depensation is likely in view of the small home ranges of many

rockfish species, reduced population sizes, reduced proportion and abundance of older, larger females within local populations, and the natural high variability in recruitment that is further exacerbated by reduced population size and low Ne/Ncensus ratios. (See also, Gasciogne & Lipcius 2004 and Stephens et al. 1999.) Moreover, as noted by Jennings (Jennings 2001) it will usually be very difficult to detect depensation in stock data because there are usually very few data points at very low population sizes and variability around mean spawner-recruit relationships is normally high -- and for most Puget Sound rockfish stock such data is minimal or non-existent.

4. The fact that Department data are generally inadequate for providing an adequate baseline for identifying population level recovery goals.

5. Recognizing the need for rebuilding and recovery targets and goals to include broad margins of error to account for uncertainty and to account for sources of mortality that are difficult to manage and/or quantify, including: bycatch of rockfish in other fisheries, mortality from derelict fishing gear, high variability in recruitment success, and potential impacts to rockfisbh growth rates, maturity schedules, and recruitment success due to climate change.

Under "actions", we strongly support all four action items. We believe that Marine Protected Areas, and especially No-Take Reserves, will need to be the centerpiece of the Plan if a natural, ecologically functional assemblage of rockfish species is to be recovered in Puget Sound. Assessing and improving existing MPAs in Puget Sound, expanding their spatial boundaries, creating properly planned new MPAs, and identifying the most optimal suite of enforcement and monitoring actions under current budget constraints should be identified as priority tasks in the Plan and in the EIS.

As discussed above ensuring "that rockfish populations contain a wide variety of age groups, emphasizing protection of older rockfish" is critically important. We recommend, however, that the language of this action item (#2) include a clear statement of the need to recover and rebuild natural age structures by protecting all current age classes from all sources of extra-natural mortality. It is certainly important and essential to protect older fish in present populations, but most populations require the recovery of older age classes, an increase in the proportion of older aged fish in local populations (See, e.g., Baskett et al 2005, Dulvey et al 2004, and Enberg et al. 2009.)

Habitat Protection and Restoration. We support the preferred alternative. With regard to Strategy #4 of the Plan (page 62), we strongly recommend that the Department secure an independent performance audit of its Hydraulic Project Approval (HPA) process. Before the Plan can credibly rely upon its authority under the HPA process to protect "all rockfish habitat types" (page 9) from further loss and degradation it needs to assess how well the current process is working in this regard. In order to obtain an objective and conflict-of-interest-free assessment of the current HPA process an independent performance audit by a qualified entity outside WDFW and Washington state government is essential. The Plan should explain the need for and request such an audit.

We also believe that the department needs to examine the effect of the U.S. Army Corps of Engineers practice of removing floating large woody debris (LWD) from Puget Sound. In Palsson et al 2009, it is noted that the first recruitment phase for juvenile quillback and brown rockfish is associated with detached benthic macrophytes that have drifted offshore. These rafts of detached benthic macrophytes are often formed around pieces of LWD that have drifted into the Sound from local rivers. The practice of removing LWD and associated rafts of detached benthic macrophytes from Puget Sound could affecting the survival of early stage juvenile rockfish by eliminating a key habitat.

Fishery Management. We strongly support the objective statement.

We recommend that the fishery management category be placed immediately after the natural production category, ahead of habitat in the Plan in the EIS. It is clearly the most important factor in the region-wide decline. Placing it ahead of habitat serves to emphasize this.

We support all associated strategies and most actions. We have reservations about devoting time and limited resources to trying to minimize mortalities of live-released rockfish. The emphasis should be placed on eliminating fishing encounters. Techniques that reduce release mortalities at best result in expected mortalities greater than 20%. This would be another matter altogether if populations were robust, not in need of rebuilding, and able to withstand some modest amount of direct and indirect harvest mortality. But severely depressed populations need every extant individual to have as great a probability of contributing to reproduction as possible. Release mortalities in the neighborhood of 20% or more fail to provide the requisite level of protection.

We believe action #2 should specifically include the development of a rockfish species identification placard or the provision of additional rockfish identification information in the regulations pamphlet.

We believe action item #9 (page 63) should be more strongly stated as "eliminate encounters of rockfish whose stocks are in less than healthy condition". Alternatively, we would support a re-statement that conditions constraining incidental encounters to specific maximum levels depending upon stock status, with the intent that quantitative standards and guidelines be developed under the Plan for determining what incidental mortality levels are acceptable for depleted stocks in various conditions.

Ecosystem. We strongly oppose the preferred, minimalist alternative, especially when presented as being opportunistically pursued. The rockfish species complex likely played a significant role in the food web of a healthy, resilient Puget Sound ecosystem. Food web integrity and complexity must be recovered if rockfish are to be recovered. Alternative #1 should be the preferred alternative and alternative #2 ("[p]rotect existing functions of key rockfish and conduct opportunistic activities to restore the functions of key rockfish in the complex ecosystem and food web of Puget Sound" (page 9) should be included as a near-term strategy toward achieving the preferred objective. This strategy

should be clearly associated with and linked to a research and monitoring program and discussed further under those categories of the Plan.

As already noted, Marine Protected Areas will be central to rockfish preservation and recovery. The ecosystem and population-specific rebuilding goals, research, and monitoring that the Plan should be built upon should largely focus on an expanded system of MPAs. The Plan and the EIS should therefore include extensive cross-referencing among these Plan categories.

Monitoring, evaluation, and adaptive management. We strongly support the development of a robust and integrated monitoring and adaptive management program as a central component of the Plan. We support the list of strategies (page 66) insofar as they are statements of general intentions.

However, we believe that the Plan should address the need to identify a doable list of key monitoring and research needs and tasks within the first year following adoption of the Plan.

Adaptive management has too often become an excuse to engage in data collection to avoid making hard conservation decisions. (See, for example, Dormus 2001). It will be critical to a successful rockfish conservation plan that clear, measurable thresholds and timelines be identified for each recovery action taken and actions in response to the achievement or non-achievement of such thresholds be determined in advance of the undertaking of each action. The Plan must exemplify a clear and strong commitment to respond as promptly to monitoring data as possible and to remain committed to successful courses of action and to change direction in specified ways when data reveals that a course of action is not succeeding as expected.

Research. We strongly support the policy objective (page 67). In particular, we support strategies #2 and #3. The formation of a workgroup to identify high priority information needs and recommend cost-effective research to acquire critical data should occur soon after the adoption of the Plan. Research will have to be closely linked to monitoring and adaptive management to insure that research will be timely and informative to management and that monitoring will be directed at acquiring the essential data to evaluate the success of the Plan.

A specific challenge to both research and monitoring/adaptive management will be to identify monitoring data that can be acquired over short time periods (one to five years) yet linked informatively to key data on population-level responses that will only occur over longer time periods (decades) given both the life histories and severely depressed conditions of Puget Sound rockfish populations. (See, for example Goodman 2002 for a detailed discussion of this issue and of the technical approach needed to address it.) Considerable thought will need to be devoted to this issue in the early months of implementation of the Plan.

Outreach and education. We support the goal. We recommend that the Plan clearly emphasize the importance of developing a broad public constituency in support of rockfish conservation. In particular, the Plan presents the Department with a valuable time-sensitive opportunity to broaden its constituency of non-consumptive users of the aquatic resources of Puget Sound. The existence of organizations such as REEF provides opportunity to employ sound citizen-based monitoring in the recovery of Puget Sound rockfish. The Plan should include a strong statement of its intent to efficiently use such citizen science.

Enhancement. We strongly disagree with the objectives.

There is no evidence to support the use of artificial production as a conservation measure for groundfish, especially ones like rockfish with viviparous reproduction. This notion is speculative at best. In view of limited funding, the untested nature of this particular kind of artificial production, and the high costs that would likely be involved in developing even a pilot exercise, there is no prospect that attempting to develop such artificial production would be cost-effective. Additionally, the funding of artificial propagation efforts would result in decreased funding for other, more meaningful management opportunities. Any such conservation measure would likely need to be sustained for several rockfish generations, resulting in a considerable cost with no credible prospects for success. In addition, modeling recently conducted by Dr. Selina Heppel and colleagues at Oregon State University (Heppell et al 2004) has strongly indicated that this kind of artificial production exercise is far more costly and considerably less effective than equal investments in Marine Reserves and other management measures to protect rockfish populations from fishery impacts and habitat destruction.

There is also no substantive evidence that building artificial reefs or related structures results in any net increase in rockfish recruitment and population size, and is certainly not a cost-effective alternative to habitat protection, marine protected areas, and control of fishing mortality impacts.

Other General Comments

DEIS Section 1.4: Table 2 in Section 1.4 presents Environmental Impact Potential Review Summarized By Element. Number 7, Environmental Health, states in (a) "No change in the amount of distribution of fishing effort." This sentence is unclear. If it was meant to read "No change in the amount **or** distribution of fishing effort", as we suspect, it seems contradictory to 7(c) and 12(a).

Geographic Scope of the Plan: The 1998 Puget Sound Groundfish Management Plan and the 2009 Biology and Assessment of Rockfish in Puget Sound both describe Puget Sound to include the Straits west to the Bonilla-Tatoosh line at Cape Flattery. The draft PSRCP and the DEIS have excised the portion of Puget Sound, including Neah Bay, between Cape Flattery and the mouth of the Sekiu River. The DEIS (Section 2.1.1)

inaccurately states that the existing Puget Sound Groundfish Plan (1998) identifies the western boundary of North Puget Sound as the Sekiu River.

Arguably, Puget Sound's most complex rockfish habitats and diverse assemblages of rockfish are found in and around Neah Bay, just outside of the region currently defined in the PSRCP and the DEIS. Ironically, despite it's relative functionality and its potential as a source of rockfish recruitment for the rest of Puget Sound and the coast, this area (4B) is currently subjected to significantly less restrictive rockfish / bottomfish recreational fishing regulations. We feel that Area 4B is critically fundamental to PS Rockfish recovery and therefore can not be excluded from the PSRCP or its DEIS.

Bibliography.

Baskett, M.L., S. Levin, S.D. Gaines, and J. Dushoff. 2005. "Marine reserve design and the evolution of size at maturation in harvested fish". Ecological Applications 15(3), pp. 882-901.

Doremus, Holly. 2001. "Adaptive management, the endangered species act, and the institutional challenge of "new age" environmental protection." Washburn Law Journal, v.41, pp.50 - 89.

Dulvey, N.K., J.R. Ellis, N.B. Goodwin, A. Grant, J.D. Reynolds, and S. Jennings. 2004. "Methods of assessing extinction risk in marine fishes." Fish and Fisheries 5, pp. 255 - 276.

Enberg, K., C. Jorgenson, E.S. Dunlop, M. Heino, and U. Dieckmann. 2009. "Implications of fisheries-induced evolution for stock rebuilding and recovery". Evolutionary Applications, 2009. PP. 394 – 414.

Gasciogne, J. and R. N. Lipcius. 2004. "Allee effects in marine systems". Marine Ecology Progress Series V.269, pp.49-59.

Goodman, D. 2002. "Predictive Bayesian population viability analysis: a logic for listing criteria, delisting criteria, and recovery plans." Chapter 21, in Population Viability Analysis. Beissinger, S. R., and D. R. McCullough, editors. University of Chicago 2002.

Groundfish Management Team (GMT) Report on the Development of a Discard Mortality Matrix for Ocean and Estuary Recreational Fisheries. 2008.

Henry, J., Droscher, T., Broadhurst, G. and Wayne Palsson (eds). 2002. Puget Sound Notes. Number 46 – January 2002.

Heppell, S., S. Heppell, M. Hixon 2004. "A cost-benefit analysis of marine reserves and stock enhancement for recovering rockfish populations". Power Point Presentation at the annual meeting of the Ecological Society of America, Portland, Oregon, 2004.

Hutchings, J.H. and J. D. Reynolds 2004. "Marine fish population collapse: consequences for recovery and extinction risk". BioScience, vol. 54, no. 4, pp. 297 – 309.

Jennings, S. 2001. "Patterns and prediction of population recovery in marine reserves". Reviews in Fish Biology and Fisheries 10: pp., 209 - 231.

Palsson, Wayne A. 2001. The Development of Criteria for Establshing and Monitoring No-take Reguges for Rockfishes and Other Rocky Habitat Fishes in Puget Sound. Puget Sound Research 2001.

Palsson, W., Northup, T., and M. W. Barker. 1998. Puget Sound Groundfish Management Plan (Revised). Washington Dept. of Fish and Wildlife, December 1998.

Palsson, W., Pacunski, R., and Tony R. Parra. 2003. Time will tell: Long-term Observations of the Response of Rocky-Habitat Fishes to Marine Reserves in Puget Sound. Washington Dept. of Fish and Wildlife. Proceedings of 2003 Georgia Basin/Puget Sound Research Conference.

Palsson, Wayne. in Scinto, Lori (*ed*). 1999. Strategies for Developing and Applying Marine Protected Area Science in Puget Sound/Georgia Basin. May 17-18, 1999 Workshop – Bellingham, WA.

Palsson, W., Tsou, T., Bargmann, G., Buckley, R., West, J., Mills, M., Cheng, Y., and R. E. Pacunski. 2009. The Biology and Assessment of Rockfishes in Puget Sound. Fish Management Division, Fish Program, WDFW.

Stephens, P. A., W. J. Sutherland, and R. P. Freckleton. 1999. "What is the Alee effect?". Oikos, 87(1): pp. 185 – 190.

Turner, T. F., J. P. Wares, and J. R. Gold. 2002."Genetic effective size is three orders of magnitude smaller than adult census size in abundant, estuarine-dependent marine fish (*Sciaenops ocellatus*)". Genetics 162: pp. 1329 - 1339.

Yoklavich, Mary, (*ed*). 1998. Marine Harvest Refugia for West Coast Rockfish: A Workshop. NOAA Technical Memo NMFS. August 1998.

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From: Bargmann, Gregory G (DFW)
To: Burley, Craig C (DFW);
cc: Eturaspe, Teresa A (DFW);
Palsson, Wayne A (DFW);
Subject: FW: Rockfish plan
Date: Monday, October 26, 2009 4:12:30 PM

Here is a message on the Rockfish DEIS/Plan- far from a ringing endorsement

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From: Bear Holmes [mailto:oldbearholmes@comcast.net]
Sent: Monday, October 26, 2009 4:04 PM
To: Bargmann, Gregory G (DFW)
Subject: Re: Rockfish plan

Greg,
Yes, I've read it cover to cover and I am trying to get the CCA Government Relations Committee to approve my response so it can be printed on CCA letterhead and be presented officially at Thursday's Mill Creek meeting as CCA's official preliminary response. I intend to bring a few dozen folks to the Mill Creek meeting Thursday too.

I think the plan is well thought-out but poorly structured. It is extremely difficult for the average fisherman to read and comprehend especially considering you should read the Biology and Assessment and the proposed rule changes as they all are connected. If the intent was to prepare a well written, easily understandable document for public consumption, it fell well short of its mark. We will be (are) requesting a full 90 day review period in order to give CCA, PSA and others the opportunity to decipher the document and get it in front of their membership and prepare a proper response. With an all volunteer effort that meets monthly, and the structure of the various committees, we just can't push things through any quicker.

That said, there's some good stuff in there in regards to RRA's and public education and a few other things. The proposed MPA's and the 120' limit are scary and all of the organizations I am associated with will fight them aggressively.

Although a secondary concern at this point, I am very disappointed in the position on artificial reefs; if unchanged, the plan would pretty much shut down our proposed project. We will now work within the system to overcome the obstacles the plan puts in our way. I told you earlier to not take it personal if we end up on opposite sides of the table during this process and it appears that's where we might be on a couple of these issues.

Bear

Bear Holmes
office direct 206-768-6424
cell 253-797-4804

----- Original Message -----
From: "Gregory G Bargmann (DFW)" <Gregory.Bargmann@dfw.wa.gov>
To: "Bear Holmes" <oldbearholmes@comcast.net>
Sent: Monday, October 26, 2009 3:26:32 PM GMT -08:00 US/Canada Pacific
Subject: Rockfish plan

Hi Bear- I expected to hear from you regarding the draft plan/EIS for rockfish in Puget Sound. It does contain an element for habitat improvement. Have you had a chance to look it over?

Greg

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northwest Region
7600 Sand Point Way NE
Seattle, Washington 98115

January 4, 2010

296

Washington State Department of Fish and Wildlife
Phil Anderson, Director
1111 Washington Street Southeast
Olympia, Washington 98501

Re: Draft Puget Sound Rockfish Conservation Plan

Dear Phil ~~Mr. Anderson,~~

This correspondence is in response to the Washington State Department of Fish and Wildlife's (WDFW) request for comments on the draft Rockfish Conservation Plan (Plan) and associated draft Environmental Impact Statement. The Plan provides a comprehensive overview of future rockfish conservation and management options within the Puget Sound, and we provide the following specific comments to select components of the plan:

Key Species Approach. The key species identified in the Plan include copper (*Sebastes caurinus*), quillback (*Seb. Maliger*), black (*Seb. Melanops*), yelloweye (*Seb. Ruberrimus*), bocaccio (*Seb. Paucispinis*), canary (*Seb. Pinniger*), and Puget Sound (*Seb. Emphaeus*) rockfish. We agree that concentration of management on these species is appropriate because together they represent and use all components of the Puget Sound marine ecosystem, including the pelagic, deepwater and nearshore environments. In a broad sense, actions designed to protect these species will in turn protect other rockfish species within these habitats. However, fisheries and habitat management actions should also account for other rockfish species in order to avoid inadvertent habitat degradation and/or unsustainable fisheries bycatch levels. In addition, opportunistic data gathering for all species would further inform precautionary management actions.

Research. The draft plan identifies alternative 2 (labeled conservative) as the preferred option. We believe that implementation of alternative 1 (most conservative) would better protect rockfish species because it would allow studies of all species of rockfish as research opportunities arise, and enable management changes in response to altered environmental conditions and species status. Though research should be focused on the seven key species, opportunistic and concurrent studies of other species would further inform management decisions and understanding of ecosystem processes.

Enhancement (Artificial Habitat and Hatchery Production). The Plan's preferred option is to utilize hatchery production to assist in recovery of depleted populations, and to construct artificial reefs to replace "lost or degraded" natural rockfish habitats. We comment specifically on the possible use of hatchery supplementation and artificial habitat creation for bocaccio, canary and yelloweye rockfish, proposed for listing under the Endangered Species Act.

There are several associated risks and uncertainties regarding hatchery augmentation that may outweigh possible benefits, including; 1) the difficulty of finding and successfully capturing sufficient numbers of mature adults within the Distinct Population Segment (DPS), 2) as identified in NOAA's draft status review[1], interbreeding of cultured and wild fish can potentially lead to a loss in fitness of naturally spawning populations. The genetic effects of hatchery augmentation of rockfish (with associated high fecundities) could be significant. Hatchery bred rockfish may be inadvertently modified by breeding practices and the rearing environment, each of which could lead to the erosion of genetic diversity and fitness of natural populations. Finally, monitoring the relative effects and success of hatchery supplementation in the natural environment may be difficult.

The possible use of hatchery augmentation for these three species should only be considered within the context of final recovery plan(s), and after population and demographic censuses occur within all major regions of the DPS. In order for hatchery augmentation to be a potentially necessary management action, these surveys would need to establish that one or more regions are unlikely to host sufficient numbers of reproductively mature adults (considering Allee affects) for natural production to facilitate probable recovery in light of environmental and other stressors. Similarly, an assessment of the natural recruitment potential from adjacent regions within the DPS would need to occur. In total, the risks and uncertainties associated with hatchery supplementation must be weighed in the context of a greater understanding of the status of the viability parameters of each species. At present, there is insufficient information to justify the associated risks of hatchery supplementation programs for these three species.

The relative environmental and species-level effects of the creation of artificial habitats for rockfish are generally unclear. The Plan states that new artificial habitats will be used to replace lost or degraded habitat. The link between deepwater benthic habitat degradation and rockfish population viability within the DPS has yet to be sufficiently established to justify its augmentation with artificial structures.

Fishery Management. The Plan identifies alternative 1 (most conservative) as the preferred option. We support this alternative because it will best enable survival and recovery of all species of rockfish, and bocaccio, canary and yelloweye rockfish in particular. We will continue to work with WDFW to implement actions and management options that minimize risks from fisheries, while also enabling fishing opportunities for salmon, bottomfish and halibut that are consistent with survival and recovery requirements.

Designation of Rockfish Conservation Areas. We agree with WDFW's proposal to establish rockfish conservation areas. The designation of these areas will be an essential management measure and should be scientifically driven. In addition, the involvement of tribes and local stakeholders regarding the location and management options for each conservation area is crucial. We encourage WDFW to partner with interested tribes, agencies and stakeholder groups to begin the process of identifying high-value areas as candidate rockfish conservation areas.

[1] http://www.nwr.noaa.gov/Other-Marine-Species/Puget-Sound-Marine-Fishes/upload/PS-rockfish-review-08.pdf

We appreciate WDFW's collaborative and comprehensive approach to rockfish conservation, and look forward to working on rockfish recovery in the coming months and years. If you have any questions about this correspondence, please contact Dan Tonnes at (206) 526-4643, or Dan.Tonnes@noaa.gov.

Sincerely,

Donna Darm
Assistant Regional Administrator

SEATTLE AQUARIUM SOCIETY

1415 Western Avenue, Suite 505
Seattle, Washington 98101-2051

206.682.3474
www.seattleaquarium.org

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January 5, 2010

TO: Wash Dept. of Fish and Wildlife

RE: Draft EIS - Rockfish Conservation Plan

VIA EMAIL: SEPAdesk2@dfw.wa.gov

Dear Ms. Eturaspe:

The Seattle Aquarium commends WDFW for the development of a detailed and thoughtful draft management plan to bring about recovery of Puget Sound rockfish. We urge your adoption of the most conservative option - Alternative 1 - in order to include all 28 rockfish species in the Sound as opposed to the other alternatives covering a sub-set of only key species as proxies for all.

Your plan recognizes the valuable contribution of rockfish to the overall health of the Puget Sound ecosystem. The draft EIS indicates over 15 species of federally and/or state protected marine fish, birds and mammals have significant interactions with one or more rockfish species in the Sound. The need to view these waters as an integrated and co-dependent system requires that we include all possible species and the most protective measures in the management approach.

In addition to rockfish being integral to the local marine ecology, many are also vulnerable to overfishing due to their reproductive strategies. Several of these species do not mature until their teens or early 20s. Such late reproducing species need strict fishery management to assure their viability.

In line with the mission of the Seattle Aquarium, "*Inspiring Conservation of our Marine Environment*," we will continue providing our Puget Sound Great Hall to host subsequent public gatherings to engage citizens in the efforts of WDFW, Puget Sound Partnership and other conservation partners. Soon we will unveil a new interactive Puget Sound fish ID kiosk in the Hall rich with natural history and conservation education to inspire our 800,000+ visitors a year, including content on rockfish.

In addition, we offer the assistance and expertise of all of our departments. The Seattle Aquarium leads many initiatives which are in line with the intent of this plan. Our research teams have monitored bottomfish populations in multiple locations in the Strait of Juan de Fuca for a number of years, and have just received a grant to allow expansion of this program into Southern Puget Sound and Oregon. This research can be a direct feed into proposed monitoring efforts in the Salish Sea. Second, through normal operations of our education-based exhibitry, we harbor a reproductively active rockfish broodstock, working with NOAA researchers on rockfish larval rearing techniques – this program can be a direct contributor to the success of the Rockfish Conservation Plan. Finally, the goals and proposed actions in the education and outreach portion of this plan are exactly in line with the mission of the Seattle Aquarium; many of the points not only ring true to our mission, but are currently in practice as part of our culture.

Please feel free to contact our research curator Dr. Shawn Larson at shawn.larson@seattle.gov, education and conservation manager Kathy Sider at kathy.sider@seattle.gov and conservation curator Mark Plunkett at mark.plunkett@seattle.gov.

Sincerely,

Robert W. Davidson
Chief Executive Officer

John R. Braden
Director

Bargmann, Gregory G (DFW)

294

From: Curt Kraemer [kraemerfam1@hotmail.com]
Sent: Wednesday, May 19, 2010 8:24 AM
To: SEPADesk2 (DFW)
Subject: Rockfish DEIS comments

Thank you for the opportunity to comment on the revised DEIS for the Puget Sound rockfish plan. I believe that my comments on the origin plan remain on file and most of those still remain germane. I would like to confine my additional comments on the revised plan to three areas.

Geographic area-
I believe that the expansion of geographic area covered by this plan to include the most western part of the Strait of Juan de Fuca is not supported by the biological information of the rockfish found in that region. My understanding in reading the supporting documents is that rockfish populations in the western straits are more closely tied to the coastal populations (especially in terms of recruitment) while those of the Puget Sound and to a lesser degree the eastern Straits are more isolate and dependent on recruitment from local populations rather than from the more extensive coastal populations.

Consider for a moment the decision by NOAA Fisheries in establishing the Distinct Population Segment (DPS) for the ESA listed Puget Sound rockfish. Their decision was to limit the geographic area for that DPS to those waters east of the Victoria Sill; Puget Sound proper if you will. Typically the Feds base such decisions on the best biological information available. It would have seemed reasonable that if adjustments were needed for the revised plan that serious consideration would have been given to collapsing the area to match the Puget Sound DPS. Not only would that allow decisions to more direct ESA question it would allow the managers to focus on the key local issues for each geographic region rather than trying to force a "one size fits all" management paradigm.

It is my belief that by focusing on the population dynamics of the rockfish and development of specific management plans in each of three regions: Puget Sound (the ESA DPS), the Straits, and the coast the resource will be best served which of course will ultimately benefit the citizens of the State.

Population Status -
In section 2.6 the statement -"This conclusion is based on previous analysis conducted by WDFW staff (Palsson et al, 2009)"... while correct leaves the reader with the impression that the current status information is based on current or very recent information. However a review of the text found in "The Biology and Assessment of Rockfishes in Puget Sound", Palsson et al, 2009 reveals that the information used in the assessing the various Puget Sound rockfish species was dated; mostly from the mid to late 1990s. In effect this means that decisions are being made concerning rockfish issues based on the status of the animals nearly 15 years ago.

This situation calls for an update in the status of the populations reflecting the latest information. Such an update would allow the decisions makers to make informed decisions using current information rather dated information which in many cases was insufficient to establish that status of the species under consideration. For example while a status is listed for each of the stocks the reality was that there was insufficient data to establish the status of a number of the species: including browns, blacks, yelloweye, yellowtails, bocacio, tigers, splitnose, and blues and the status of the canary was based on the trends from coastal populations. It would be more correct to say that the status of those species are in fact unknown. For the other species sufficient information was available to make status decisions. Of the 14 stock status decisions with sufficient information (7 species in north and south sound) 7 were considered healthy.

While I have no quarrel with managing those stocks that the managers have insufficient information to determine their status with a precautionary management approach considering those stocks as having a precautionary status implies a degree of certainty that does not exist. Clearly based on the available data the status of many of the Puget Sound rockfish stocks is unknown. To assign them any other status is not

supported by the data. Further giving those stocks an unknown status highlights the informational needs for those stocks. Again it should be remember that assigning a stock as unknown should not preclude a precautionary management of that stock.
In the last 15 years or so there has been significant changes in what was considered to be a major stressor of Puget Sound rockfish. The over fishing that occurred in the late 1970s and early 1980s is considered by most to be the pivotal fact in tipping the population from a healthy situation. With the extensive fisheries management changes that occurred following the over fishing it is important to understand how the Puget Sound rockfish populations responded to those changes. With a long-lived and slow growing fish like Puget Sound rockfish there always is a considerable delay in seeing positive population responses to management changes; this is doubly so when there is only sporadic juvenile recruitment. It would only be only one or more decades post changes that one would expect to see consistent measurable population responses and predictably one would expect to see such responses in those species that are the fastest growing and shortest generational times.

For the Puget Sound rockfish the coppers are the species I would expect to see the earliest population responses to past fishing regulation changes. For quillbacks and other species one would expect any population changes to follow that seen with the coppers. Anecdotal information from both divers and recreational fishers in the last few years are reporting encountering more juvenile and larger rockfish (for a variety of species). The limited creel information presented in Palsson et al, 2009 indicated that for both copper and quillback rockfish the number of larger fish has been increasing in the later half of the past decade.

For both the copper and quillback rockfish a major component in determining their stock status was the length frequency information from recreational creel checks. This information was key in determining the potential spawning potential of the population. While for a decade or so quality rockfish creel information from Puget Sound was lacking that has been addressed being in the spring of 2003. Since that time some of the best Puget Sound rockfish creel information from the last 30 years has been collected. Given the dated stock status, the passage of time since many of the Puget Sound rockfish fisheries changes, the availability of recent quality creel information, the new emphasis on rockfish and the growing anecdotal reports of positive changes in at least the copper and quillback stocks now seems to be an appropriate time for an update in stock status of Puget Sound rockfish. Such an update would help determine where the focus needs to be on population restoration. It should be noted that first step in recovery of our rockfish populations would be increased abundances of younger/smaller individuals with an increase in the portion of larger fish with the passage of time. It should also be noted that with the closure of Puget Sound to the harvest of rockfish in 2010 there will be no new creel information upon which to base status updates of Puget Sound copper and quillback rockfish; in short any likely information for any near future stock status update on those two species is now in hand.

As mentioned earlier half of the Puget Sound rockfish stocks where there was sufficient information available to determine their status in the late 1990s were considered to be health. The two vermillion stocks were considered to have a precautionary status due primarily to their low productivity but it was noted in Palsson et al, 2009 that the vermilion rockfish were considered to be an "invasive species" with what appeared to be increasing abundances. If indeed the abundances of quillback and copper rockfish is increasing (a status update would go along way to confirming or refuting those observations) then 13 of the 14 Puget Sound stocks with data available for stock determination could be considered either healthy or increasing in abundance.

Assuming that the anecdotal regarding the copper and quillback rockfish has some foundation the north sound Puget Sound rockfish maybe is the single stock whose status was determined through the use of "data" that may not be responding to the fisheries management changes over the last couple decades. Some other factor or stressor such as predation may be limiting that stock.

With the elimination of recreational harvest for all Puget Sound rockfish and the fact that there was insufficient data to determine the status of many of the Puget Sound stocks a critical aspect of the fish plan and issue that needs to be addressed in the DEIS is when will updates to the dated status determination be done and what sort of information will be used?

Enhancement - section 3.3.8

This section deals with artificial habitat and hatchery actions to supplement rockfish production in Puget Sound. This type of remedy for fish populations that are experiencing recruitment or lost of productivity due to habitat loss have been attempt in a variety of situations. At best the results for this type of approach to enhancing populations can be described as "mixed". Because so little is known about Puget Sound rockfish and what may be limiting their populations artificial habitat and hatchery actions should be viewed as experimental.

In this light the alternatives listed in this section are miss characterized. For example option 1 (the preferred option) which promotes the achievement of the natural production policy objectives through the appropriate use of hatchery production and artificial habitats is considered in the document as being the "most conservative". However to my way of thinking relying on experimental approaches rather than natural processes (either through restoration or time) is the least conservative of the options presented. The surest way to achieve natural production objectives is through relying on the restoration of the natural processes that historically support Puget Sound rockfish; this type of strategy should be considered the "most conservative".

Sincerely
Curt Kraemer

Hotmail is redefining busy with tools for the New Busy. Get more from your inbox. See how.

Bargmann, Gregory G (DFW)

From: janet olson [olson.janet503@gmail.com]
Sent: Wednesday, May 19, 2010 8:12 AM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

294

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

janet olson
31-486 Royal Bay Drive
Victoria, BC V9C 4L6

Bargmann, Gregory G (DFW)

From: Sierra Club Membership Services [membership.services@sierraclub.org] on behalf of Linda Mills [lindarecycles@gmail.com]
Sent: Friday, May 28, 2010 10:10 PM
To: SEPADesk2 (DFW)
Subject: Please Support the Revised Puget Sound Rockfish Conservation Plan

400

May 29, 2010

Ms. Teresa Eturaspe
600 Capitol Way
Olympia, WA 98501-1091

Dear Ms. Eturaspe,

I am writing today in strong support of the Revised Puget Sound Rockfish Conservation Plan. This plan will allow all Endangered Species of Puget Sound to rebuild their populations, help restore critical Puget Sound ecosystems, and help create sustainable fisheries for our future.

Puget Sound has the most depressed fisheries in North America and Washington has the longest list (51) of endangered marine species.

The revised plan is part of a larger nationwide political movement toward Ecosystem Based Management (EBM). EBM recognizes that ecosystem connections exist amongst all living things and human activities and habitat protection. EBM will guide our uses of the oceans and coasts so they are used and managed sustainably. EBM is clearly the future for managing all of our natural marine resources.

I, and the Sierra Club, Cascade Chapter, support the Preferred Action Alternative proposed by the WDFW; and we need "No Take"
marine reserves to protect marine habitats and help restore all endangered species.

Modern fishing technology allows fishermen to identify and take fish from any habitat or site in Puget Sound. We need sites protected to protect vulnerable species.

Please hold local public meetings each time a marine reserve (MR) or rockfish conservation area (RCA) is proposed and please promote the restoration potential of "No Take" marine reserves.

The Revised Plan is clearly the most proactive plan the WDFW has ever written to protect and restore the fisheries and ecosystems of Puget Sound; and I offer it my strong support.

Sincerely,

Ms. Linda Mills
540 Allenhurst Rd
Amherst, NY 14226-2880

Bargmann, Gregory G (DFW)

From: Sierra Club Membership Services [membership.services@sierraclub.org] on behalf of Bridget Bailey [isyouis67@aol.com]
Sent: Monday, May 31, 2010 11:14 AM
To: SEPADesk2 (DFW)
Subject: Please Support the Revised Puget Sound Rockfish Conservation Plan

301

May 31, 2010

Ms. Teresa Eturaspe
600 Capitol Way
Olympia, WA 98501-1091

Dear Ms. Eturaspe,

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The revised plan is part of a larger nationwide political movement toward Ecosystem Based Management (EBM). EBM recognizes that ecosystem connections exist amongst all living things and human activities and habitat protection. EBM will guide our uses of the oceans and coasts so they are used and managed sustainably. EBM is clearly the future for managing all of our natural marine resources.

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Please hold local public meetings each time a marine reserve (MR) or rockfish conservation area (RCA) is proposed and please promote the restoration potential of "No Take" marine reserves.

The Revised Plan is clearly the most proactive plan the WDFW has ever written to protect and restore the fisheries and ecosystems of Puget Sound; and I offer it my strong support.

Sincerely,

Ms. Bridget Bailey
22 September Ln
Stafford, VA 22554-6833

Bargmann, Gregory G (DFW)

From: Mike Schutt [fishincoug@yahoo.com]
Sent: Friday, May 28, 2010 3:15 PM
To: SEPADesk2 (DFW)
Subject: Puget Sound Rockfish Conservation Plan DEIS

302

Dear WDFW

As a Professional Wildlife and Fisheries Biologist, I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Mike Schutt
1911 Rucker Ave.
Everett, WA 98201

Bargmann, Gregory G (DFW)

From: Dan Kuperberg [dskupe@chewuchinn.com]
Sent: Thursday, May 20, 2010 11:32 AM
To: SEPADesk (DFW)
Subject: Puget Sound Rockfish Conservation Plan DEIS

303

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Dan Kuperberg
223 white Ave.
Winthrop, WA 98862

Bargmann, Gregory G (DFW)

From: Eldon Ball [eldonball@juno.com]
Sent: Friday, May 21, 2010 3:40 PM
To: SEPADesk (DFW)
Subject: I support the Rockfish Conservation Plan

304

Dear Dept of Fish and Wildlife

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.
As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.
I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.
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Eldon Ball
3200 NE 140th St., #11
Seattle, WA 98125

Bargmann, Gregory G (DFW)

From: Dayna Yalowicki [dlwicki@verizon.net]
Sent: Sunday, May 23, 2010 10:14 AM
To: SEPADesk (DFW)
Subject: I support the Rockfish Conservation Plan

365

Dear Dept of Fish and Wildlife

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

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Dayna Yalowicki
23426 53rd Ave SE
Bothell, WA 98021-8039

Bargmann, Gregory G (DFW)

From: Jana Hobbs [urtica@verizon.net]
Sent: Wednesday, May 19, 2010 9:24 PM
To: SEPADesk2 (DFW)
Subject: Puget Sound Rockfish Conservation Plan DEIS

306

Dear WDFW

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The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Jana Hobbs
13506 NE 66th ST
Kirkland, WA 98033

Bargmann, Gregory G (DFW)

From: elipenberthy@gmail.com on behalf of Eli Penberthy [eli.penberthy@pccsea.com]
Sent: Wednesday, May 19, 2010 4:49 PM
To: SEPADesk2 (DFW)
Subject: Rockfish Conservation Plan - PCC Natural Markets

To the Washington State Department of Fish and Wildlife:

As a seafood retailer, we're writing to support the Revised Puget Sound Rockfish Conservation Plan. With nine stores and $145 million in annual sales, PCC is committed to sustainable food systems. Sustainable seafood is an integral part of this mission.

We understand Puget Sound is vulnerable to many environmental threats -- acidification, polluted storm water, pesticides, plastics, and aquaculture feedlots. Four salmon farms south of Bainbridge Island continue to allow untreated fish waste, equal to 830,000 city residents, to flush directly into Puget Sound.

It is alarming that scientists have declared Puget Sound the most depressed fishery in North America. It is disheartening that Washington has more endangered marine species (51) than any other state. The revised plan takes important measures to protect and restore them.

Thirty-six nations already have demonstrated the value of such restorative actions, creating thousands of marine reserves to protect biodiversity and restore depleted fisheries and degraded habitats. Many research reports show that marine reserves are profoundly successful for the restoration of many species. Since reserves protect habitat and ecosystems, the benefits of the Revised Plan transcend rockfish and positively impact all plants and animals that are dependent on a natural reserve environment.

Specifically, we support the Preferred Action Alternative on p. 43 of the plan, which states:

Rockfish management shall place the highest priority on the protection and restoration of the natural production of indicator rockfishes to healthy levels.
All fishery and ecosystem management protects and recovers indicator rockfish species to healthy levels and considers the management and ecosystem impacts of other marine species ... Only indicator species will be managed in an ecosystem context that considers the natural capacity of a population to sustain itself in relation to food web dynamics, targeted and bycatch fishery removals, other human-induced stressors and limiting factors, and climatic factors. Stocks will be managed to assure intact genetic structure, sustainable production, age diversity, and ecosystem services. The management of other marine species will consider fishery, habitat, population, and other impacts on the integrity and sustainability of natural rockfish populations of indicator species.

Modern fishing technologies allow fishermen to find and take fish from any habitat or site in Puget Sound. We need sites protected to protect vulnerable species. It is vitally important that we establish "No Take" marine reserves to protect marine habitats and help restore all endangered species.

In an effort to include the public in your decision-making on rockfish and other threatened marine populations in Puget Sound, please hold local public meetings each time a marine reserve or rockfish conservation area (RCA) is proposed.

Bargmann, Gregory G (DFW)

From: Sierra Club Membership Services [membership.services@sierraclub.org] on behalf of Mary Weeks [zwooba@sbcglobal.net]
Sent: Tuesday, May 18, 2010 1:55 PM
To: SEPADesk2 (DFW)
Subject: Please Support the Revised Puget Sound Rockfish Conservation Plan

304

May 18, 2010

Ms. Teresa Eturaspe
600 Capitol Way
Olympia, WA 98501-1091

Dear Ms. Eturaspe,

I am writing today in strong support of the Revised Puget Sound Rockfish Conservation Plan. This plan will allow all Endangered Species of Puget Sound to rebuild their populations, help restore critical Puget Sound ecosystems, and help create sustainable fisheries for our future.

Puget Sound has the most depressed fisheries in North America and Washington has the longest list (51) of endangered marine species.

The revised plan is part of a larger nationwide political movement toward Ecosystem Based Management (EBM). EBM recognizes that ecosystem connections exist amongst all living things and human activities and habitat protection. EBM will guide our uses of the oceans and coasts so they are used and managed sustainably. EBM is clearly the future for managing all of our natural marine resources.

I, and the Sierra Club, Cascade Chapter, support the Preferred Action Alternative proposed by the WDFW; and we need "No Take"
marine reserves to protect marine habitats and help restore all endangered species.

Modern fishing technology allows fishermen to identify and take fish from any habitat or site in Puget Sound. We need sites protected to protect vulnerable species.

Please hold local public meetings each time a marine reserve (MR) or rockfish conservation area (RCA) is proposed and please promote the restoration potential of "No Take" marine reserves.

The Revised Plan is clearly the most proactive plan the WDFW has ever written to protect and restore the fisheries and ecosystems of Puget Sound; and I offer it my strong support.

Sincerely,

Mrs. Mary Weeks
901 Maine St
Lawrence, KS 66044-3951

Bargmann, Gregory G (DFW)

From: Gene Wan [redk01@ml1.net]
Sent: Tuesday, May 18, 2010 1:42 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

309

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Gene Wan
6827 29th Ave NE
Seattle, WA 98115

Bargmann, Gregory G (DFW)

From: Alexander Flemmer [flemmsquad@gmail.com]
Sent: Monday, May 17, 2010 5:09 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Alexander Flemmer
9502 6th Av. N.W.
Seattle, WA 98117

Bargmann, Gregory G (DFW)

From: Thomas Holz [tomholz@comcast.net]
Sent: Monday, May 17, 2010 3:51 PM
To: SEPADesk (DFW)
Subject: I support the Rockfish Conservation Plan

311

Dear Dept of Fish and Wildlife

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Thomas Holz
6135 Mink Street NW
Olympia, WA 98502

Bargmann, Gregory G (DFW)

From: Tracy Ouellette [tajenkins@pol.net]
Sent: Monday, May 17, 2010 12:37 PM
To: SEPADesk (DFW)
Subject: Puget Sound Rockfish Conservation Plan DEIS

312

Dear Dept of Fish and Wildlife

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Tracy Ouellette
14078 MacTaggart Ave
14078 MacTaggart Ave
Bow, WA 98232

Bargmann, Gregory G (DFW)

From: D Bradley [dbrad1369@hotmail.com]
Sent: Sunday, May 16, 2010 3:10 PM
To: SEPADesk2 (DFW)
Subject: rockfish plan

314

I agree that the three species of endangered rock fish need to be protected. I DO NOT agree with closing copper or quillback rock fish in area 7 or with the 120 foot depth restriction or with decreasing ling cod size limit to 36". I rarely fish over 160 feet and I catch hundreds of rockfish and I can only remember one having issues returning underwater. A few from over 150 feet have have bloated bellies and mildly swollen eyes have still gone right back underwater. Some tiger rockfish I have caught in past years had problems from depths of 180 to 200 feet but these were vented and went right back down. I see in the Atlantic they are teaching venting as a responsible way to save fish and this is arguable from both sides of the issue. Regardless 150 to 160 feet is the depth the restriction should be allowed to. Are there certain areas these endangered fish are located? Personally, I have never caught any of these 3. I think closing areas for reserves is a lot more beneficial because these areas spill over when the populations become denser. I have seen this in areas next to other preserves, there are lot of rockfish and baby lings in these areas. This year I have caught nearly a hundred rockfish since may 1 and there seems to be no shortage of copper rockfish anywhere in area 7. I agree with areas 8-1 and 8-2 being closed for rockfish because there area not many areas for them. As for decreasing ling cod size from 40 to 36, there is no reason for this, the large females are already being protected and very few ling caught are in this 36 to 40 range(maybe one if a person catches a handfull a year, most are 27 to 32).
I don't catch that many cabezon. Maybe they should have a one a day limit.
Greenling should have a 2 fish a day limit as well.
I have comments on halibut as well. I am out there all the time and others I know too and lot of people get nothing. Most catch nothing and some catch lots. The people who get lots and charters are the ones running over the quotas. How about a longer season but with personal yearly limits of maybe 5 or 6 fish or whatever is figured to be reasonable? That way more people get a share of the quota.
Also dungy crabs limits shouldnt be touched until commercial and tribal fisheries are reigned in. I see undersized crab being sold at stores and restaurants all over the area. They have no limit to amount of pots and sometimes u cant even drive your boat they have soooo many out there.
Thanks for the opportunity to voice my opinions.

The New Busy think 9 to 5 is a cute idea. Combine multiple calendars with Hotmail. Get busy.

Bargmann, Gregory G (DFW)

From: Kaija Campos [kaija.campos@gmail.com]
Sent: Wednesday, May 12, 2010 5:08 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

315

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Kaija Campos
616 E Thomas #102
Seattle, WA 98102-5352

Bargmann, Gregory G (DFW)

From: Sue Cannard [donnsuecannard@comcast.net]
Sent: Wednesday, May 12, 2010 5:11 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

316

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Sue Cannard
2303NE 45th Circle
Vancouver, WA 98663

Bargmann, Gregory G (DFW)

From: Eugene Kiver [froghollow@sisna.com]
Sent: Wednesday, May 12, 2010 5:14 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

317

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Eugene Kiver
4210 Tyler Way
Anacortes, WA 98221

Bargmann, Gregory G (DFW)

From: Joel and Lucinda Wingard [wingardjl@comcast.net]
Sent: Wednesday, May 12, 2010 5:27 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

318

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Biodiversity is critical to the health of the earth. Protecting native species from overfishing, unhealthy habitat and unnatural predation is one of the factors in restoring the health of Puget Sound.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

We support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Joel and Lucinda Wingard
3604 121st St Ct. NW
Gig Harbor, WA 98332

Bargmann, Gregory G (DFW)

From: Bob Aegerter [boba@openaccess.org]
Sent: Wednesday, May 12, 2010 5:34 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

39

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Bob Aegerter
370 Sudden Vly
Bellingham,, WA 98229-4807

Bargmann, Gregory G (DFW)

From: Bob Triggs [littlestoneflyfisher@mail.com]
Sent: Wednesday, May 12, 2010 5:50 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

320

Dear WDFW

I agree with this missive in entirety. I would add that there are more factors than we understand at this time that have contributed to the decline of Rockfish and other groundfish species in this region. But certainly fishing and habitat damage are at the forefront. Frankly, given the state of these fish, I can not support any harvest of Rockfish and I am disappiointed that WDFW does allow it. I do support the Puget Sound Rockfish Conservation Plan. I would add here that I am strongly in support of Marine Protected areas as a major aspect of this and similar efforts to recover fish species.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

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Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Bob Triggs
box 261
Port Townsend, WA 98368

Bargmann, Gregory G (DFW)

From: Sara King [sara.king@pobox.com]
Sent: Wednesday, May 12, 2010 5:58 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

321

Dear WDFW

Regarding the Puget Sound Rockfish Conservation Plan, I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Overfishing of the rockfish has caused its decline. Science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. A ban on rockfish fishing is necessary in the short term to save the species in the long run.

Sara King
6647 Montevista Dr Se
Auburn, WA 9809

Bargmann, Gregory G (DFW)

From: Patricia Rodgers [patriciam@clearwire.net]
Sent: Wednesday, May 12, 2010 6:00 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

377

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

I support the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

WDFW needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

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Patricia Rodgers
8121 NE 141st Street
Bothell, WA 98011-5324

Bargmann, Gregory G (DFW)

From: Kimberly Christensen [kimc@speakeasy.org]
Sent: Wednesday, May 12, 2010 6:01 PM
To: SEPADesk2 (DFW)
Subject: I support the Rockfish Conservation Plan

323

Dear WDFW

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

As state agencies, regional businesses, local governments, non profits, tribes, and locales work to recovery Puget Sound by 2010, adopting and effectively implementing the proposed Puget Sound Rockfish Conservation plan will be extremely important.

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Kimberly Christensen
3827 Bagley Ave. N
Seattle, WA 98103

Bargmann, Gregory G (DFW)

From: Mark Schiff [h20mark@hotmail.com]
Sent: Wednesday, May 12, 2010 10:17 PM
To: SEPADesk2 (DFW)
Subject: Puget Sound Rockfish Conservation Plan DEIS

327

Dear WDFW

I support the Puget Sound Rockfish Conservation Plan, which is the preferred alternative in the draft Environmental Impact Statement (DEIS). The recovery plan is good as it provides a broad suite of tools for rockfish recovery and a framework for conducting rockfish stock assessments and management measures. Establishing natural recovery methods such as marine protected areas and rockfish conservation areas need to be the top priorities.

The Department of Fish and Wildlife needs to convene a panel of experts immediately upon adoption to begin planning the network of protected areas necessary to accomplish recovery.

Also, science supports that the best way to recover such species is to stop fishing of any kind over large areas so that the ecosystem which supports rockfish can recover. The declines in rockfish populations do not appear to be the result of habitat limitations. They have simply been overfished.

Thank you for this opportunity to provide public comment on the Puget Sound Rockfish Conservation Plan.

Mark Schiff
PO Box 255
Dupont, WA 98327

COMMENTS MADE AT PUBLIC MEETINGS

To facilitate public comments on the draft EIS and plan, the Washington Department of Fish and Wildlife hosted a series of public workshops during the public comment period. These workshops consisted to two parts:

1. `A staff presentation on the plan and DEIS. This portion of the workshop was not recorded.
2. An opportunity for public comments. Interested persons were asked to provide comments on the DEIS and Plan. This portion of the workshop was recorded and the comments considered during the development of the Final EIS and Plan.

The workshops were held as follows:

October 29, 209	Mill Creek
November 2, 2009	Friday Harbor
November 4, 2009	Olympia
November 6, 2009	Port Townsend
November 30, 2009	Bremerton
December 2, 2009	Seattle
December 3, 2009	Mount Vernon
April 7, 2010	Port Angeles

The following section contains the transcript of the public comment made at each of these workshops. The transcripts have not been edited. Throughout the transcripts, comments made by Jo Wadsworth, Wayne Palsson and Greg Bargmann occur. These three persons are staff members of WDFW and their statements were made to facilitate the meeting and are not to be considered as public comments.

Mill Creek Rockfish Conservation Meeting

Greg Bargmann: Introduce yourself and your name and your organization we would really like that. If you signed up at the start of the meeting on one of these sheets, we do not need your address or anything but if you have not done that then we'll need you to give us your address and that sort of thing. So we encourage people to do that and we have…how many people here would like to speak tonight? Okay, so we had set about three minutes each and we have a little over an hour so what would you think we'll limit people to three minutes and we'll go around, everybody gets a chance to speak, and then if we still have time we'll go back and give people a longer time. I want to make sure we give everybody a chance to talk.

Wayne Palsson: We had, we had on this, these sign up we had a column on whether you wanted to give a comment or not (Noise)…presentation remind me to change. If you would like to…what we'll do is for people who have indicated yes we'll ask those folks to come up and give a comment and then I'll give…ask an opportunity for anybody else who wants to comment, just say your name so I can check you off and then you can make your comment and we'll see how well that's organized. It seems like there's about 10, 20 people here maybe that want to give comments I think maybe we can get through it in an hour or so. Any questions about that?

Male: Question before we get started, you talked earlier about potentially extending the deadline on the comments. When would you expect to have that decision made so that we can plan our time accordingly to make, so we can get our comments on time?

Greg Bargmann: Next week. I had hoped to have it tonight, but there's still…looking at…

Male: Next week. Next Friday? Next Wednesday?

Greg Bargmann: Oh, by next Friday. Next Friday, and if you sign up we, we have a commitment. If you sign up we will contact you and say the public comment period has been extended or if we don't make it by next Friday then I'll say well it's still under decision.

Male: These are extensive documents and I'm a slow reader. It took me a fair amount of time to go through those and it's going to take me a fair amount of time to generate comments, and I appreciate knowing ahead of time as much as possible how much time I've got.

Greg Bargmann: I know that we've got a number…Okay, so Wayne, who is first on our list?

Wayne Palsson: Has anybody else…I think I've got the right number of seats…but if you have not signed up on this and you want to get information back from us, please make sure your name is on one of these lists. Okay so, I am not going to go by any particular order as such I will ask Ken Komasawa please come up. Now there are two microphones here that are recording. We have a double system here just in case. We want to get make sure we get your comments and we'll also be taking notes of your comments.

Ken Komasawa: My name is Ken Komasawa. I'm a recreational fisherman. I am on the Anadromous Fish and Marine Resource Advisory Group at the state department. I also represent

three Puget Sound anglers clubs in the central Puget Sound area. My main concern, not really with some of the actual document right now. You mention SEPA, the guidelines that you were following, but there are also Washington State Administrative procedure guidelines that need to be followed, and I'm wondering have you done any financial fiscal analysis of what this program will incur? And then also, have you done a small business impact statement affecting the sports industry based upon, particularly, if as many closures come in as they might be? Those are my comments for this evening. I will look at the document further and make comments specifically about the plan other than these.

Wayne Palsson: Keith, uh…

Keith Sprygada: Sprygada. Everybody chokes on that name.

Wayne Palsson: If you don't want to sit at the table, if you could hold one of these two mics that would be great. That way we can make sure…

Keith Sprygada: He prefers to sit. I would actually, yeah.

Wayne Palsson: Just don't pound the table too much.

Keith Sprygada: Keith Sprygada from Renton. A recreational fishing angler, CCA member, PSA member, and I'm going to direct my comments down to one tonight, and that's basically the devil's in the details. In this particular political environment I trust no government organization. This document is full of very vague terminologies and details. They are not defined under definitions words such as "healthy levels," "historical levels," "depleted." Those concern me quite a bit. The other thing is on this document there's no set dates for periodic reviews to go back and look at this document compared to the facts for established timelines. Those are my comments for tonight and I'll have detailed comments further in writing out the future, so…

Wayne Palsson: Thank you very much. Okay, Wallace Cogley.

Wallace Cogley: Thank you for the opportunity. My name is Wallace Cogley. I am a member of the CCA, PSA, and I am speaking for myself. And, I do know that you are the, just the bearers of news, so don't think I am jumping on your cases. I have several concerns, and I was at the closure proposals for the west side of San Juan as well. Same comments. I'm tired of hearing science used as a motivating force for everything and instead of hearing science I get opinions, estimates, and vague illusions. And, that's not the basis for making judgments. The truth is, we don't have any scientific knowledge about Puget Sound in my opinion, and that's the problem. These decisions are being made, we're going to close this area, we're going to make a marine protected area as opposed to an exclusionary area. By the way that's going to screw up your commercial fishing, that's going to screw up your private and recreational fishing, but that's what we think will get the job done. I don't think we've done enough research to know what will get the job done. I would strongly urge that you extend this 30-day public review to 90 days. This is a major issue. I know people who won't be able to read that thing in 30 days. But, not withstanding, a minimum of a 90-day public discussion comment review time. Recreational fishers should, would be uniquely impacted by the proposals of this marine protected areas and

fishing restrictions. Evidence to indicate a multiple of factors has caused this already. Overfishing not just by commercial, by sport fishers. More studies are needed to determine a rational approach to mitigating these multiple factors. Draft plan gives little consideration to direct or indirect mortality from commercial fishing. Plan does not consider that habitat restoration programs are already underway. Six hundred acres has been reclaimed by the removal of the dead, the nets, so far and that process is ongoing. That reclamation stopping the number of fish killed was greater than the estimates for how many peop…fish have been killed, the rockfish have been killed by the sports fishers. Little scientific emphasis is presented indicating that creation of MPAs would provide greater conservation benefits and less severe conservation measures such as recovery areas, habitat restoration, marine enhancement. No criteria for periodic scientific assessment and review has been proposed which would close, which the closed areas could be reopened. Last thing, plan takes about a one size fits all approach managing rockfish in Puget Sound. They define Puget Sound as clear out to the ocean basically. Comparing Hood Canal, the Strait, San Juan Islands, and South Sound doesn't really make much sense, they're such different environments that these rockfish come in. I think, it's legitimate, and I commend the Department for looking at ways to learn more. They don't have enough information, in my opinion, to make a scientifically defensible, let alone intelligent, decision to shut things down. Thank you very much.

Wayne Palsson: Bear Holmes please.

Bear Holmes: Bear Holmes. PSA, CCA. I'm here speaking tonight on behalf of CCA. A lot of what you're going to hear me say is what Wally just said, but I'm going to say it officially on behalf of CCA to be read into the public record. CCA Washington and other local grassroots organizations are primarily comprised of citizen volunteers and require adequate time to review, discuss, and provide comment on a proposal of this magnitude. In addition to technical nature of this plan also compounds the need for additional time to review the science related to the Puget Sound rockfish. This requires more than 30 days to provide a coordinated and meaningful response. As a result, CCA respectfully requests the public review period be extended from 30 to 90 days which would take it through and including January 17, 2010. Meanwhile the Department's October 19th notice announced four public meetings: Mill Creek, Friday Harbor, Olympia, and Port Townsend. For many Puget Sound residents including those in Kitsap, Whatcom, Skagit, and Island Counties the current public comment locations would require significant time and expense to attend, which limits their availability to participate in the public process. Accordingly, CCA of Washington believes that additional public meetings should be held in Skagit and Kitsap Counties to ensure that the many interested residents in those areas, including members of the CCA Washington, have an opportunity to better understand the proposal. Recreational fishers would be uniquely impacted by proposed marine protected areas and fishing regulations. The adherence indicates a multiple factors have affected rockfish populations including passed-over fishing having a habitat degradation, pollution, predation, and derelict fishing gear to name a few. More study is needed to determine a rational approach to mitigating these multiple threats before implementing regulations that focus on only one group, recreational anglers. For example, the draft plan gives little consideration to the direct and indirect mortality from commercial fishing activities. And, I'd like to add that this plan focuses on past practices and doesn't focus on the existing stressors, and I'm curious if you have enough data to produce a plan from current stressors? And, when we talk about current stressors, we're

talking about the derelict nets that are being removed and that habitat that's being restored. And, then we're curious why there wasn't ever a, an, in the plan you recognized that the commercial, that the tribal fisheries take about 500 pounds of rockfish a year. About half of those nets that are out there on the, derelict nets out there are tribal nets. They're still fishing. They were fishing for something else apparently when they got hung up so they, had they not got hung up there would have been bycatch. We don't see any bycatch records and I think you admitted that you don't have bycatch records for tribal or commercial fisheries, so we really don't know what that stressor is, and there other fisheries going on in Puget Sound other than just the trawl up in the north Sound for the yellowtail. And, we don't see yellowtail listed as a concerned species although it's the only species right now apparently that there is a commercial harvest on. Do you have the data on those and if they are a commercial species, shouldn't they be considered under as one of the key species for the plan? Wally covered most of the other stuff. I do want to say that we were only able to get out a message to our membership at 6:00 last night because of the complexity of these issues, because of the time it takes for our membership to go through this, we have regional, national…local, regional, and national experts that work on exactly this stuff. It's very difficult for us to coordinate all those people, most of whom are volunteers, so it takes us a while to do it. We are ten days into this process but you can expect that CCA will have more questions and written, prepared comments at the next meeting. I want to tell you that CCA overall supports the need for this plan and supports the plan in general terms but it has to be significantly modified before we would support it in total. And, I thank you for your time.

Wayne Palsson: Next one is Robert Tobeck. Robert?

Robert Tobeck: Thanks guys. I'm Robert Tobeck. I'm here on behalf of CCA, the Outdoor Line radio show, and as a father of two boys that love to bottomfish. I want to bounce around a little bit because I took notes as you guys were talking. I really think this plan disproportionately targets recreational fishermen. You mentioned quite a few stressors in your plan, unfortunately the ones you list as high, once again, are past harvest and current harvest. I don't know if you are talking about the harvest of seals and sea lions when you consider current harvest but seals and sea lions according to your conservative estimates…seals alone consume 300,000 rockfish annually. There's no numbers for sea lions in there. A year 2000 study from NOAA puts the Puget Sound population of 9,000 seals and that the healthy level should be about 7,000. Currently there's an estimated 14,000 in the Puget Sound, so we're way over populated there. I'm just curious as to how you guys plan to account for that in your proposals? Also, regarding MPAs, my fear is that the MPAs…first off the science is not conclusive on MPAs; there's a lot of studies that show that they're not beneficial, there's some that show that they are beneficial. The goals in this plan have not been defined on what the MPA is, what the process would be to implement them, or if they would be permanent. I fear that an MPA would, would basically be like a buffet…you could call it a BFS really, a buffet for seals and sea lions because what you're closing off to fishermen. If the population of the rockfish did increase within the MPA, there's no doubt that seals and sea lions would find that population and have a good time at it. So with that in mind, if there is not going to be something done about the seals and sea lions, what's the point of providing them increased opportunity to feed at will without doing something about their populations? A couple things you mentioned in your presentation; you mentioned that you were looking at pollution, looking at habitat, and you're looking at commercial gear. You mentioned a few other things, those are the three that I wrote down. The unfortunate things is in

this proposal the things that you are proposing, not that you are looking at, the things you are proposing, MPAs, limits of opportunities, you proposed tonight no retention of rockfish. Those are things that all directly affect recreational fishermen. I'm just curious as to why recreational fishermen have been singled out when we've established that ghost nets, seals and sea lions, commercial gear, which we don't know I guess we haven't established on them because we don't have any data on those. But at least there's two or three other stressors that consume way more and have way more encounters with rockfish than recreational fishermen do. I would also like to stress the fact that artificial habitat, you know I appreciate that fact that you guys are willing to look at that, and in particular I'm talking about artificial reefs. I would like to see an opportunity to study that and with the state and if that were to, if it were to show an increase, you mention there's no evidence that they, yet attract fish not a lot of evidence that they increase fish populations and allow fish to breed and things like that. There are studies that show that. Dr. Milton Love, with UC Santa Barbara has shown that on oil rigs out in the state of California has shown that they act as nurseries and are every bit as effective as natural reefs. I would like those studies to be considered as well. But, I think the ultimate goal for a lot of us here, that a lot of us would like to see some artificial reefs in this state would eventually like to be able to harvest on those reefs and to fish on those reefs and for our kids, our grandkids, and things like that to be able to continue to enjoy bottomfishing and enjoy the resource as we have all these years. Let me see some of my other notes here. I just, once again I feel like this plan, its focused in the wrong direction it focuses at recreational fishermen. Once again, pollution, I haven't touched on that. Pollution is a major problem according to the Puget Sound Partnership (PSP). One hundred-forty thousand pounds of toxic chemicals in our Puget Sound on a daily basis. That's one of the organizations that you propose working with so I use their numbers. You say that this plan provides…you are unable to provide a, find a negative environmental impact with this plan. I think this plan doesn't go far enough, it doesn't show or prove any lasting benefits if all these proposals were enacted. Thanks for your time.

Wayne Palsson: Okay. Thank you very much. Next one I have here is Dale Deierling. Deierling. Please restate the name for the record.

Dale Deierling: Dale Deierling. I represent the Snohomish Sportsmen's Club, I co-chair the Everett coho derby, reputedly the largest coho salmon derby on the west coast, maybe in the world, nobody's ever been able to tell us that. I think this thing is kind of an ambush. You guys came up with this in a very, very quick fashion, 30 days is definitely not enough and I'd like to say that. Robbie brought up a very good point about the seals I didn't even think of. That's um that's just a huge issue. The, the fact that you targeted the recreational fishermen, the people that actually put the most money into the economy is, is ah it just is totally a a counter common sense. I'm mean I'm sorry I'm stuttering a little bit here, I'm a little bit pissed off about this whole thing. Um, we pay the, the Department of Wildlife enormous amounts of money and what do we get? We get the short shift in return. And, again, I'm sorry I'm a little bit emotional about this, but I think that these points are all valid, and that's all I have to say.

Wayne Palsson: Thank you very much sir. Chuck Hickey.

Chuck Hickey: I've been fishing for a long time out on the Puget Sound. I used to be able to go out there and get fish. I got fish I know now must have been a hundred years old. I've had

lingcod get off that were bigger than a man. And ah, but when you kill something that is older than you are and maybe older than your folks are, maybe older than your grandparents if they, in my case, if they would have lived, this is a devastating problem. The Department of Fisheries has gotten short shrift . Greg knows of one particular time when they tried to make a dogfish fishery, the gillnetters…that's what they mean, by the way, when they say net, gillnetters okay, just…I was going to interrupt but I…uh Greg's a hell of a good man and I didn't want to interrupt him, but I'll tell you what, when it comes to the almighty dollar and you got a guy out there and he's got gas, he's got, well a wife and kids at home, and he's trying to put meat on the table, he should have never been let back in Puget Sound after World War 2. Now, I'm only 63, but I've had my heart attack I may not even be able to have my operation, so I may not be able to see it, but all my life I have known what part of the problem has been. And there's not a, there's not a sport fisherman in here that wouldn't give up every opportunity to see that a fishery recovers. But, by and large, even though I admit I've taken fish, I know now that they are a lot older than, and all that information has come to my awareness since, but, I'll tell you what, we're not the problem. We may be part of it, but we're not the problem because we're not out there when people aren't looking. There's people out there when people aren't looking. When you were a little kid what did you do when people weren't looking? So, sometimes I wish that I could get, at least find people that [will] actually stand up and tell you all the atrocities they've seen or heard of in their life that they know. I mean, it's a devastating situation you got fish that take fifty to sixty years to hit [to] your plate at home. And, I can't believe it, you know, I mean, like I said I mean I think the biggest lingcod I ever took is like 54 pounds or something like that. Is there such a thing out there anymore? There is? **Female:** Yes. **Chuck:** So, but these, but these other guys like black rockfish fishing them off of Duncan Rock before there was a limit. I mean, fill the front of my boat because I expected them to be there, there was no limit. We'd fish for hours, you know, and I had my rockfish all winter. I didn't know it took them 27 years to get that big. So, it's a hell of a problem, but still, maybe, I think that the sportsmens going to be a lot more willing to work with the Department of Fisheries in the final analysis. I'm a member of the CCA and I'm really pumped up because I believe that Gary Loomis and crew have got the right answer. And all the other groups I totally, you know I've been through Trout Unlimited and they, any way my three minutes have gone, thanks for putting up with me.

Wayne Palsson: Frank Eshpeter

Frank Eshpeter: I'd like to thank you for giving me the time. My name is Frank Eshpeter, I'm president of the South King County Puget Sound Anglers and president of the SeaTac Chapter of the CCA. Most of what I wanted to say has already been said, but I think the main thing we want to stress is, we need more time. I'm not a fast reader, and this document takes too much time for the short time we have. Ninety days would really be a big help. I also have concerns about some of the gear restrictions that are mentioned. I really don't understand how a downrigger is going to catch many rockfish. I know it can happen, but that's going to restrict a lot of people from the blackmouth fishery also. Thank you.

Wayne Palsson: Russell Carver.

Russell Carver: My name is Russell Carver. I'm here on behalf of myself and my grandkids, and I'm a member of PSA and CCA. I haven't looked at, even had a chance to look at the

proposal. I was at a PSA meeting last night when I was informed of the meeting tonight, and I'm like Frank, I'm not a very good reader. I can't read real well. I'm pretty hard of hearing, and I'd like the state to provide maybe an audio tape for people like me that can't read very well, so we could go somewhere and actually have that read to us or so we could hear it or whatever because I'm really not the best reader in the world but if somebody else explains it and reads it, I'd just like that opportunity. I do think we need an extension of at least ninety days if not longer to get more input from other people like our, you're our state and we've trusted you for years and the bottom fishery in this state since I was a little kid has really depleted. That's why we're all here today, but our group, the CCA group, Bear Holmes, is working on a project that should have been done a long time ago, by the state, you know, I mean, checking things out and trying to do things about it that should have happened a long time ago, and I'm glad and I commend you for doing what you're doing because it is going to help us and maybe our grandkids will have a chance to catch a fish somewhere down the road, and I thank you for your time.

Wayne Palsson: Rich Setter, Settle, Settee..

Rich Settle: Yeah, right here. I'd like to pass for right now.

Wayne Palsson: Okay. So, those are all the names that indicated they were interested in providing comments, but we have lots well, I won't say lots of time, but we do have time for anybody else that would like to make comments, so please come on up here, please introduce yourself and if you have not registered on this sheet, I saw a couple people coming in…make sure that you sign up so we can get back to you and provide our responses and give you more information…

Tom Elliott: My name is Tom Elliott and I'm with the CCA and the PSA, but I'm here representing myself tonight. I heard a lot of good comments, a lot of things brought up about how quickly this was done, about some of the restrictions that are placed heavily on the recreational fisherman. But one of the things I heard that disturbed me the most was that there is no outline or set goals for recovery, that I saw. A Fish and Game person asked me what's in the value of the fish and his idea that just a fish being a fish in the stream had value in and of itself. That's fine if you're a SCUBA diver, which I am, but the value of the fish to the state, to the people of the state, to the people in this room, is the opportunity to catch it. And, if we're going to curtrail [sic] recovery only to the point to where you're not able to fish for them but they're there, that to me is not recovery at all, and not recovery worth doing. I would like to see recovery with set goals, to not only bring it back, keep them off the ESA listing, but to make it to be fishable again within reason because overfishing is how we got here whether it was by commercials, tribal or non-tribal, or whether it was by people in this room back when there was no limits, limits were not set by the state. We need to get back to where we can take our kids out fishing at least for some fish, otherwise I don't see, really see a value in it at all. Thank you.

Wayne Palsson: Yes sir. Why don't you come up please and tell us your name.

Gary Thomason: My name is Gary Thomason. I just, I like to fish. **Greg:** Can you speak into the microphone? **Gary:** Okay. My name is Gary Thomason and I just like to fish. I've been fishing a long time. I used to fish in California. What really concerns me is what's happened in

California with the MPAs down there, and that it looks like the same is happening here. I fished down there for quite a number of years before I moved up here. I've been fishing here for about the better part of thirty years, but the bottom line is, everywhere I fished in California is basically going to be closed by MPAs. No fishing. Off limits. If you've watched the circus that's going on down there, you might understand my concern. Please look at what's happened. Here is some information recently written about the California MPAs, "The RFRA ocean protection coalition and other conservation groups have asked for suspension of the MLPA process due to the lack of dedicated funding, numerous conflicts of interest, by MPLA, MLPA decision-makers for lack of clarity about what type of activities are allowed in reserves."

And, recently, a NOAA research ship killed a blue whale while mapping the ocean bottom. This was last week. This tragic incident only highlights the urgent need to suspend the corrupt and out of control MLPA corporate brainwashing process. It is opposed by the vast majority of north coast residents in California. The whale is a metaphor for the north coast communities who've been run over by NOAA, an agency on auto-pilot. The Department of Fish and Game is riding their coat tails using the habitat data in the MLPA process. This California is not a reflection in Washington. My big concern is, that's what's happening here. Part of the communities impacted by California's (Attacha Polma?) tribe sustainably harvest seaweed, mussels, abalone off Stewarts Point for centuries. California Fish and Game Commission, under orders of Governor Schwarzenegger, banned them, the seaweed harvesters, fishermen, and abalone divers from their traditional harvesting areas in Sonoma and Mendocino Counties. Forever. One of their representatives said, "What you are doing is taking the food out of our mouths. When the first settlers came to the coast they didn't know how to feed themselves. Our people showed them how to eat out of the ocean. My opinion it was a big mistake." Everybody who cares about the health of our oceans and coastal communities should support full, independent, impartial investigation of the killing of the whale by NOAA at the same time the MLPA process rife with conflict of interests (?) the corruption of the democratic process should be immediately suspended. You're seeing the front end of it in my opinion here. I saw a big chunk of this when I attended the three orca whale meetings where we were allowed to talk to the committee and we have no idea what's going on. Why should I be concerned? May be a little paranoid? Well I've got more data, but I understand that yelloweye, canary, and maybe bocaccio or whatever it is. But an ex-WDFW biologist, Sam Wright, had filed the petition for the Endangered Species Act and that's gone through. A biological review team, NOAA made the recommendations to put those on the endangered or whatever list and apparently his stated goal is to make Puget Sound a 20% percent no fishing preserve. That's been his stated goal for a long time. You folks probably know him a lot better than I do, I just know what I read in the papers. So, I would really appreciate if the state of Washington and the federal government could come out in writing the promises that what happened in California is not going to happen in Washington State. I've got some other…I'd like to move on, I think that you may understand that my concern expressed by at least one other person is a great distrust, and we don't have to look very far to have very good reason not to trust the MPA process.

Now, on some more technical matters, on the derelict nets your report estimates 61,000 rockfish per year killed. The report cites 3900 derelict nets. So that works out to about every 23 days one net will kill one fish. I think that's a bit low on your estimate, but I really don't have a basis to say what the real numbers are, and I know you're picking up derelict nets for part of that could

you please update the data in the plan to reflect the data that you are taking from the derelict net process? I think the numbers are quite a bit higher than 61,000 per year. If nothing else, they've destroyed habitat. It prevents fish from living. They may not be actively killing fish, but they've made dead zones where fish can't live. And, please, if you do anything else, please continue to make that a priority to get those nets out of the water and keep those nets from getting back in. I think that is very, very important.

The trends in status of harbor seals in Washington State; there's some estimates in your report: 300,000 rockfish per year. I think I could do the math and show you how it's over a million rockfish per year using your own numbers. I think you've made a decimal point error in your math. I'd be happy to review that with you. I've got the data here. The trends of harbor seals in Washington State; the NOAA made a recommendation about five years ago to tap the harbor seal population at about 7,000. They think that the data would justify that to State of Washington to request NOAA to give them, give the state of Washington the control. But those harbor seals they don't dare be endangered, so there's management implications in this report. I'd like to give this to you. I know the records fit in the policy report, but please read this management report. I think that if we were to reduce that seal population from 14,000 back to the 7,000 cap. God, I love those seals but you know they're eating an awful lot of fish. **Male:** They make nice coats. **Gary:** But, my estimate is that you'd be saving about 860,000 rockfish per year. Even by 7,000 seals. And, that's using your 12% numbers. That's the statistics from your report. That's 5.6 pounds of fish per day; 12% of the fish. I think those numbers are very conservative, the way you collected that data and how you made those estimates is suspect. If they sampled 400 feces in the San Juans and used that as the basis of only 12% of the rockfish being eaten all around the Sound from Neah Bay down to Olympia. You couldn't sample feces in up San Juan Islands and tell me what I ate yesterday. I don't think there's a basis, a scientific basis, for using 300 samples, 400 samples to make general conclusions on a population of 14,000. Um, yeah, we talked about that. The other 88% of the seal diet, that's a lot of salmon and a lot of steelhead. Those are also on the Endangered Species list, and they also provide a food source for the orcas that are also on the Endangered Species list. So, I think by comparing these numbers of millions of fish versus maybe 10,000 or 20,000 fish by fishermen, we're going to get hit really hard. I don't think we're the big problem here. I fished here for a long time, I didn't fill up my boat with bottomfish, but I'm sure guys did. But that's not happening now. Honestly, I've never, I just don't fish for bottomfish in the Sound. My big concern is you're going to close off major areas and you're going to keep me from catching my salmon. Now, closing off areas is one thing, making realistic limits is another. I'm real concerned about the rockfish on our coast in coastal waters. There's no limits. I'm not, I don't think it's real popular to propose putting limits out there, but if these fish are as old as you think they are and they are as devastated as they are by catching them, why don't we have reasonable limits on the coastal waters? (inaudible audience comment.) Well, they're pretty generous. (inaudible audience comment.) And, then I'm also curious about the impact to the dogfish population as well as rockfish. I don't know what, how many dogfish are out there. I'm quite certain they have an effect on not only on the rockfish, but also the salmon and the steelhead. When I first started fishing out here for salmon, we had, you know we would quite frequently catch a lot of hake, and not very often, we could catch a dogfish on a rare occasion. I don't know if you can even find the hake out in the Sound, I have no idea what happened to them, but it's not uncommon to just have to leave an area for fishing because it's overrun with dogfish. They're eating something.

Anyway, I'd like to leave with that. I'm real concerned that we're just seeing the beginning. In fact, what really concerns me is here in the last couple months we've been hit with the orca closures, we've been hit with this, and we've been hit with the Obama fish plan, and it's like a surge. Okay. I don't know what's going on, I don't know why they don't like the fishermen, but I don't like what's going on either. Okay. So.

Wayne Palsson: Okay, so I'd like to ask, how many people who have not spoken yet, would still like an opportunity to speak? You sir? Okay, there's one. Anybody else who would like to speak that has not had a chance yet today? Raise your hand high. Two. Okay, you sir.

Shawn Seeger: My name is Shawn Seeger. I'm a member of CCA and PSA. I'm here speaking for myself, though.

Wayne Palsson: Excuse me, what's your name sir?

Shawn Seeger: Shawn Seeger. I took some notes while you guys were talking. One of the things that kind of jumped out at me, and even reading the plan at home, says that you've taken five years to develop this plan and do the study and what not that you're at. And if the resource was the, was or is in such as risk, you believe that MPAs are required, why haven't you acted sooner or with more urgency? Marine protection areas you have identified and you guys talked about would definitely impact salmon in Puget Sound; that impacts me and I would like to ask if you are going to put MPAs in place, if you will put in writing the end date delimiter. Tell me if it's going to be a year or two years, because I would like to be able to come back and take somebody to court if I have to. Greg, you referenced short-term closures. What does that mean to the Department, and will it have the specified end year date? Also, Greg, you, in your fisheries management slide, you referenced derelict gear and the issue of working with Puget Sound Partnership derelict nets are not something that are new. The state's been very slow in taking care of that activity, but they spend a lot of our money in other places. What is the state's plan to assure that we have no new derelict nets? Are you willing to put a ban on nets in Puget Sound period, for all commercial whether tribal or non-tribal? Put that in your plan. And, then under actions you said provide recreational harvest opportunities, but only when all stocks are healthy. That was on your slide. And, I emphasize only, because to me that is political speak for once you put an MPA in place, unless all stocks of rockfish are back to what the state identifies as 100% healthy, you're going to keep it all locked down. So, I guess, just the way you word it, I would recommend that you maybe identify that once a sub-species is healthy, then that marine area would be opened up again so that it allows for other opportunities for fishing. Thank you.

Wayne Palsson: Thank you sir. And, did you sign in on the sheet?

Shawn Seeger: I did.

Wayne Palsson: And you sir.

David Jennings: Hi. I'm David Jennings, and just speaking for myself. I don't have a firm answer in my head about what the right answer is. I just want to put my thoughts on the table on this part of this discussion. I think there is time to figure out what the right answer is. We are

currently operating under the Puget Sound groundfish management plan and Fish and Wildlife's Commission policy put in place back in 1996 which covers a lot of these same issues. So, that's got the precautionary principle as a basis for management, and so, I don't think that is a lot different from a lot of the preferred options discussed here. I think what we're facing is the fisheries where recruitment of young as episodic, irregular, very successful, but very rare. It doesn't happen every year, it doesn't happen every other year, every 10 years, maybe every 8 years, every 16 years. And so you really have to manage those, as I call them, fat old females. The whole issue is that we can fish out those older individuals so quickly that we are left with a lot of young ones that don't breed very well. And, that's what we're doing on the outer coast now, I think, with black rockfish. I agree with the comment before about the limit on the black rockfish out on the open coast of 10 fish per person per day makes no sense and I think that if you look at the stock numbers the age class distribution in that stock, the age class of the size that's being caught, there less than adult and not even breeders yet and we're catching them. That's not a way you manage a rockfish fishery. When we talk about habitat restoration and artificial reefs, I think there is a lot of uncertainty about whether or not they attract fish or increase the density of fish. I think we're much better off spending our money pulling out the derelict nets because we know that's a problem in the waters, and when we spend the money pulling the nets out that's an improvement of the habitat and it keeps them from being out there. I want to talk about hatchery production of the rockfish. I guess I have a lot questions. With the survival of young being so irregular, you know, once every 5 years, once every 10 it's got to be very difficult to figure out if the man-made hatchery is even working. What I'm concerned about is that the, we'll be feeding hatchery rockfish to hatchery delayed-release salmonids and hatchery lingcod and that's not really what I'm looking for from a hatchery rockfish management plan. When we look at this in policies for rockfish in Puget Sound, it is clear that the definition of Puget Sound goes out to the Bonilla-Tatoosh line. That's clear in the 1996 policy the Commission adopted. That's clear in the 1998 policy that the Department adopted. I don't understand why this policy that is calling itself Puget Sound doesn't go out to the Tatoosh-Bonilla line. I think that's where we have a lot of the true rockfish concerns with very low numbers of canaries present, yelloweyes, tigers and Chinas all of which don't seem to managed very well. I think that the Department did not use all the available data for looking at rockfish. REEF is a non-profit group that trains people to do underwater surveys. They have expert surveyors that they call their level 4 and 5 surveyors. And, they are actively looking for tiger, China, vermillion rockfish around the state. I think that you should be looking at those data sets as well. I think you can use citizen monitors through groups like REEF to help do a lot of the monitoring for rockfish densities and populations. Some of the data you showed on quillbacks shows that some of the list of relationship of concentration or density is usually very similar between trawl surveys and SCUBA surveys to scout the actual numbers but the trends still seem to be similar. I don't think we have a good understanding of how we address the unintentional catch of fisheries then, while we're going out for other species. Some of the time we talk about salmon and going for that upper water column. Sets of salmon, so you don't really get them. Also, we're talking about the blackmouth or others or going after lingcod or cabezon, how do you really not catch an unusual, rare, fat old female rockfish. There was no discussion about the selection criteria for key species. In my personal opinion, we need to add China, tiger, and yellowtail to that mix. But without a criteria understanding on how you selected them, it's really hard to say what should be on the key species list. I do think that I have a lot of concerns about the baseline population distribution, population structure for China and tiger rockfish in both

north and south Puget Sound. British Columbia's got a very strong rockfish management program ongoing now. My question is, how is what the Department's proposing substantially different from the British Columbia plan, and where are they diverging? I know they have a fair number of marine protection areas. And, I guess I'll disagree with a lot of people in the room, I believe the science is there to support marine protection areas. If they can't figure out when and where and what the species of concern are, but I think you can fish for salmon and not fish for bottomfish in an area and call that a bottomfish marine protection area, and that's going to help a lot of us, and a lot of the species expand out. We can all agree to disagree on I'm just saying when I look at the science, there is a lot of scientific facts about the value of marine protection areas it's killing off those areas into the (?) waters and helping the fish populations all over the place, but again we can agree to disagree. One of my main final points, and I'll leave these (?) for you guys is I really think the plan boundaries have to follow what Puget Sound is defined as which goes out to the Tatoosh-Bonilla line and not stop at the mouth of the Sekiu. Thank you.

Wayne Palsson: Okay, this will be the last call for anybody who wishes to make a comment for us to consider for this draft environmental impact statement. Anybody else?

Greg Bargmann: Great. Thank you all for coming. We really appreciate the time you took to comment. As somebody had mentioned there's two more workshops scheduled throughout the state and, not maybe not throughout, but the whole Puget Sound, we tried to spread them out. We have our comment period opened out to the middle of November. We're looking very hard at extending that. But, extending it starts to delay the end product, so we're talking about that now. We will let you know as soon as we make a decision about an extension and we will, if you made a comment here tonight at the front table, we will respond to that comment and try to capture some of the more formal comments as we do the final environmental impact statement which is scheduled, now, to be done in December but it may be a bit delayed. So, we'll keep in touch and you can contact us here. We'll be right here and we can work on this together. We want this to be a solution that will protect rockfish and allow us to utilize it too. Nobody here is trying to attack or target anybody. We're just trying to balance the conservation needs plus the desire to have people use our resources. So thank you very much.

Male: May I…just within that period of 90-day, concern was expressed multiple times and it falls right within the holiday period, so it really isn't 30 full days and that's one of the conundrums about that and I already had my say, so thank you.

The remainder of the conversation is mostly inaudible due to miscellaneous noise interference.

Greg Bargmann: Thank you very much.

Friday Harbor Rockfish Conservation Meeting

Greg Bargmann: …and it is now working, so this is November 2 at Friday Harbor laboratories at a public meeting on Puget Sound rockfish. I invite people to come up here. Wayne I think we'll take the people who have signed up first. Come up here and state your name and if you are speaking on behalf of an organization. If you have signed in we can track you down through your address and stuff, if you've not signed in, I ask you to give us your address so that we can get back to you.

Wayne Palsson: At this point, I would like to tell you that this is not your only activity, once again just to remind that you can send your comments either through email or mail by contacting us at these addresses here, so if you want more time you can take that avenue as well. So I have seven people here, and two folks so far have signed in to make comments. The first one is Eric Thompson. So I invite up Eric.

Greg Bargmann: Can I ask you to come up?

Eric Thompson: Oh.

Greg Bargmann: Thank you.

Eric Thompson: My name is Eric Thompson, and I really don't represent any organizations. I'm just a recreational fisherman.

I am very concerned about this plan. I think today I'd like to talk mostly about MPAs, and what does that mean? The Department of Fish and Wildlife defines an MPA as an area with geographical boundaries defined by law or regulation within which fishing is prohibited or restricted. It may have many purposes such as ecosystem protection, research, recreation that does not have a predetermined (?). You referred earlier in the meeting today that you don't have any more than a general idea of how large an MPA would be or how large an interlacing network of MPAs would be. And that is very troubling to me as a fisherman. What does that mean, what does an MPA mean to a…I guess this is the Wildfish Conservancy…I picked this up at the Mill Creek meeting. They have an article in here; it's the 2009 wild fish journal from the Wildfish Conservancy. They have an article on MPAs. It's in here. I'm just going to give you a general…I'm not going to quote them, but in general, one of the things they say is in the article is "failure to limit exploitation of fish have led to their collapse." Okay. It also says that "fisheries management has been an arms race between fishers and management. Fishers have just kept one step ahead of regulations, and populations have suffered." They say "The stocks have been fished randomly by unthinking fishermen. And, MPAs reduce most likely causes of stress and provides explicit prohibitions against fishing." Wow! I just have sit back and think what, what do we hope to accomplish by that kind of emplanatory rhetoric? I mean as a recreational fisherman, I find it very divisive and offensive. I think nothing could be further from the truth with regards to, if you look upon the whole, recreational fishermen, were probably from my estimation, the most highly regulated and the most responsible people out on the water. I think we can be a very effective set of eyes for WDFW. You have to have your ears open. We see what goes on. We know where the fish are. I think, by and large as a community, they act very responsibly. You can look at any community and find abuses, but, you know, I think we need to check the records before we start making rash statements and assumptions. Look at the contributions to conservation in this country provided by sportsmen. I don't think you'll find that matched by any other group. Look at the history. I think by and large we are very

concerned with the environment and conservation of the species. And, from all the testimony I've heard, I think everybody is truly concerned about protecting the stocks of the fish in Puget Sound. What do MPAs, I'm going to (?), that's what I think it means to these folks. I hate to draw a conclusion for you, but I think it's pretty clear. What do MPAs mean for northern California folks who have been living (?) the past two years? To find MPAs, closing it down. Here's an article that was written…I'm not going to read the whole thing like I did at the last meeting, but I'm going to give you some review. The RFA Ocean Protection Coalition and other conservation groups have asked for suspension of the MOA process due to lack of dedicated funding, numerous conflicts of interests by the MOA/MLP decision makers, and the lack of clarity about what types of activities are allowed in the preserves. We had a tragic incident two weeks ago where a NOAA…ship that was under contract to NOAA to map out one of those marine preserves killed a blue whale. I say the tragic incident only highlights the urgent need to suspend the corrupt and out of control MLPA corporate green washing process that is opposed by the vast majority of north coast residents of California. Everybody who cares about the health of our oceans, well skip to the end, should look at the MLPA process the trife with conflict of interest mission creed, and corruption of the democratic process which should be immediately suspended. That's what MPAs mean to these people.

What does it mean to me? We're going to save rockfish by putting MPAs in without any specific limitations or no purpose, no justification other than it looks like a good thing to do. I don't know, maybe it is. But, for me, what it means, it means that it will eliminate opportunity for my sports fishing salmon, ling, halibut, shrimp, and crab. I could very easily give up rockfish catching in the Puget Sound because I really don't do it. I just don't go fishing for rockfish in Puget Sound. Considering some of the data about the pollution and the rest of it there, I just don't think that's a healthy fish for me to be eating. But, that's, that's a little further down south maybe it's a different situation up here with your water quality. Being so close to Victoria I'd question that, but it depends on where you go. As I recall Victoria is still dumping raw sewage. Untreated. With plants. To put in a sewage treatment plant, that's good. Okay.

So, where do we go? Let's talk about the decline of fish stocks in Puget Sound. We have seen…oh, you probably have better data than I do, but you, we have seen over the past 10, 15, 20 years decline in salmon, steelhead, herring, orcas, [and] now rockfish. At the same time, we have seen an increase in the population of marine mammals, harbor seals in particular. They look like…except for a short period of time, they had a good healthy 8% increase in population over this period of time. So I tried to compare some numbers; in your report you say based upon the San Juan Islands study, 12% of the diet of the harbor seals is comprised of rockfish, so applying that liberally across the seal population from the NOAA data that's available. Compare some of the statistics that we have here from the period with 1978 to 1993 the WDFW report identifies average 261,000 pounds per year of rockfish caught by recreational fishermen using the formula and the NOAA estimates of the seal population, the seals would have consumed the 1.4 million pounds. So roughly 20% of the fish consumed between those two groups was from recreational sports fishermen. I really don't know how you guys took records back in that period of time, but I don't remember filling out rockfish cards or being questioned at the ramp, but that's okay. I'll trust your integrity. I'm not challenging you. From 1994 to 2007 the report says that recreational fishermen on average caught less than 37,000 pounds per year of rockfish. Using the estimates of the seal population and adjusting it to a match with the populations that were accurately measured in that period of time, I come up with roughly 2.6 million pounds of rockfish consumed by harbor seals. So the recreational sports fisherman catch on an average

through that period of time is about 1.4% when you compare the two. So, where does this lead us? Next year…I think last year the estimated harbor seal population at around 14,000, growing at 8% per year means about an increase of over 1,000 seals per year. So, let's assume we just tell the sports fishermen to stay off the water because they're going to kill the rockfish. We'll save 37,000 pounds of fish. Well, that's going to barely provide enough food for about 100 seals out the 1200 we expect in the new population. So, to really…when I look back at some of the inflammatory statements and some of the data that could be misconstrued in your report, that identifies sports fishermen as a major problem, I really set back and I really think that the plan is flawed. Since it identifies recreational fishing as a major problem, and starts identifying, what I would say is very drastic measures to reduce opportunity for sports fishermen. I just don't think I could ever get an agreement…you could ever get agreement with me for this especially with regards to the MPAs. I'm perfectly willing to do what I can to help rockfish, but I can't agree to give up my fishing opportunity.

Now let's look at it in a different light. Why would you expect NOAA or anyone else for that matter to accept the proposal that does not identify the conservation measures that have been recommended by NOAA that will protect the declining populations of rockfish, herring, salmon, steelhead, and orcas? In fact they really doubt that this isn't the problem. Listen to the eyes. These are the eyes from a recreational fisherman that has been on Lake Washington. Harbor seals are not supposed to be in Lake Washington. Lake Washington is got one of the very high endangered runs of Chinook salmon fishery. We have harbor seals in Lake Washington that come in and feed on these stocks and all we can do is watch in horror. I'll leave it at that.

We'll see you at the next meeting. But, we're going to keep moving forward, but that's kind of where I'm at. I'm not representing any group, just myself and my own observations. Thank you.

Greg Bargmann: Thank you very much Eric.

Wayne Palsson: And so, Carol Davis, I think she left already so she took some comment period so she took comment material. For those of you indicated you would like to comment, but we still have we're about to, actually we've gone over, it's almost 2:00 now, we'll be here for another, we can be here for another ½ hour, you can still provide comments but…does anyone else want to provide a comment?

Female: I'm ready to comment now.

Wayne Palsson: You're Barbara, right?

Barbara: Yes.

My name is Barbara Merritt. I used to be a rockfisherman in the '70s when they were still abundant, and I've never been very good at catching salmon so they were easy to catch. I think that's one of the reasons there aren't many of them left. I'm a licensed captain and recreational boater and I teach for Orange Coast College in Newport Beach, California although I live up here. I teach on the ocean.

We have, as you know, in the San Juans had several voluntary rockfish areas and we found after monitoring them that they more or less have not been successful. And, there's a variety of thoughts as to why that is the case. One is that they weren't large enough, two that they weren't well marked, and the third is that weren't always well respected. I think most sport fishermen are very respectful of the environment, but we find that there are those that come to this area, I

think it's not necessarily our local fishermen, but they are actually targeting these areas. We had done a tremendous amount of outreach letting the public know where these areas were. We had wonderful brochures that showed exactly where these areas were and people were taking the brochures and using them to find the rockfish areas because they figured, well if they are trying to protect them in these areas, there must be rockfish and maybe they are bigger than in other places. So we, I think, in the San Juans like to take a voluntary approach to things, but in this instance it just hasn't worked. It seems like with a species like rockfish that are so long-lived and so affected by so many variables, that it is hard for us to know the best way to manage them and obviously they haven't been managed well or they wouldn't be in the kind of trouble they're in. From my research, it seems like marine protected areas seem to have a better success of managing themselves. Keeping the ecosystem intact and having a checks and balances effect. I've had the opportunity to sail in the northern channel island's marine sanctuary and it's a joy to visit this area because the ecosystem is so intact. Species that have long since disappeared from the mainland are still thriving in this area and I'd like to say there's plenty of seals in this area, but there are plenty of rockfish and other species so in a healthy ecosystem one there are checks and balances so it's easy point to seals and say it's the seals problem or point to Victoria's sewage. It's a lot harder for us to look at ourselves and our own actions and be willing to take a long-term approach so that the whole ecosystem can recover so that it is healthy for our children and our children's children. Thank you.

Wayne Palsson: any other comments? 2:00 straight up.

Greg Bargmann: Okay, thanks very much for coming. What will happen is that we will have this ongoing, updated public comments, and we will evaluate those and get back to you some time. Expecting next you'll hear from us is that we will decide whether or not to extend the comment period, and then you will get a copy of our final decision. That's it. Thank you all very much for coming.

Olympia Rockfish Conservation Meeting

Wayne Palsson: …what did we do about seals, is they kind of, they are (rarely?) eaten, so **Male:** that could have been interesting. **Wayne:** So that study about 12% is rockfish or (seat?) rockfish taken in the San Juan Archipelago, we know that's the highest amount of rocky habitat. So…**Male (Bear?):** All of this is with the caveats that this is based on the information that you've provided, and in some cases it may not be applied correctly but at a minimum if that 12% constitutes poundage not just incidents, in fact it could be even more. I saw something that talked about the weighted averages if you add 10% to this factor. We're talking a million rockfish a year going down the gullets of seals. Now 900,000, a million-one, I'm not going to argue about that, but compared to 61,000 and 22,000. But we don't have seals being analyzed as a major impact? Then rockfish recovery is beyond my comprehension. I don't get it. So, my question is, "why not?" **Wayne:** Well, I think it goes back to the issue of why these alternatives feasibility issue, and we don't have authority over seals and sea lions. We, you can probably see the great strains that have been taken in the Columbia River and at Ballard and areas where they have tried to take, to cull nuisance species. **Male (Bear?):** I'm just not convinced. I don't think we've considered the culling of seals a likely management scenario. Can't we be honest and at least not put it in there as a factor even if you then put a notation in and say, "sorry, we can't touch them"?, but at least this is a high stressor. **Wayne:** Whether it's high or medium, it's a natural stressor to a great degree, and when you look at the rockfish take, or rockfish consumption, even in the San Juans it's not copper and quillback rockfish is the number one species area. It's the Puget Sound rockfish, that little ecosystem rockfish; that little fast-growing one. So, when you look at the population abundance of rockfishes, at least from some of our near-shore surveys Puget Sound is in the millions compared to tens of thousands of rockfish in copper and quillback rockfish there so, you really have to be careful when you make those analyses and that they're area specific and species specific and so, unfortunately, we don't have the species composition of which rockfish are being taken in the San Juans, but it's part of a natural mortality. Part of that we separate fishery mortality to natural mortality when we look at stock assessment, and the rockfish, the consumption by seals and sea lions is part of that natural mortality. So, I'm…it's a tough issue I suppose.

Greg Bargmann: We will look at that. In our upcoming monitoring.

Male (Bear?): I'm not talking about long-term, I'm talking about being a complement to this idea that you have 34 reproductive years interspersed by every once in a while a guy gets lucky. You want to augment those bad years through hatchery propagation up to the point where you established a good population. It's a temporary fix, the same could be said for reducing whatever level of impact those seal populations have.

Greg Bargmann: I think you're making comments now which would be appropriate later.

Male (Bear?0: You're right.

Greg Bargmann: So thank you very much. I don't mean to (?). So what we'd like to do is have a formal comment period now and this will be recorded and will be part of the record of the proceedings that we are having here. What we'd like to do, is if you want to make a comment, I think you have signed up on the sheet, we'll call…

Wayne Palsson: Has everybody signed up on the sheet when you came in?

Greg Bargmann: So what we'd like to do, when we call your name, Wayne will call you to come up here, we have a nice comfortable seat here, sit down and talk into this and give us your name, if you are affiliated with an organization, if you are speaking on behalf of an organization please identify that. If you have signed up here we'll be able to get back to you. If you have not signed up then we'll need be able to get an email or an address or something to get back to you so. And, I think we have a number of people to speak so I think what we will do Wayne is get the people who have signed up first. **Wayne:** Yep. **Greg:** And then if you change your mind and want to speak, we'll see if we have time so with that, we'll ask our first speaker to come up.

Wayne Palsson: So, Hans Mack. Please state your name so we can track your comment and we can get back to you.

Hans Mack: Okay. I'm Hans Mack from Shelton. I'm not representing any group or anything.

I believe this issue should be allowed a longer period of time for comments. There is still quite a bit of uncertainty and so far as marine protected areas and so far as rockfish protected areas and things of that nature. My home fishing area is Hood Canal. It's been closed for rockfish species last couple years due to mainly habitat issues. I believe an ecosystem-wide approach needs to be more the tool used for recovery. Much of the damage in the Canal was done by commercial dragging early in the '70s and '80s. The area's never been the same since. I'd just like to ask, "What effect has been the last couple of years of closure of the Canal, and does it facilitate recovery efforts to have a closure like this for such a large, broad area?" That's it. Thank you.

Wayne Palsson: Thank you very much. Next person is Tom Pollack.

Tom Pollack: Again, my name is Tom Pollack. I'm with CCA. I work at Sportco sporting goods in Fife. I've been in the sporting good business since 1958 selling fishing tackle. So I'm going to deviate from what probably people may think I might be talking about, but, for example, I question as to whether there had been any economic study as far as what it is going to cost retail businesses with potential closures. I'm hearing that we may see as much as 20% of the Puget Sound area closed to marine protection areas. Yes, we had a dynamite year this year. It's nothing the state did to create these humpys; it's a naturally reoccurring thing. If we have up to 20% closure in marine protected areas, it's going to wipe out the tackle business. That will probably, and it's a case it's not a short-term thing that as I see in your presentation a rockfish to get to viable resources is 8-10 years at minimum to where it's going to be 8-10 years where we can really jump on the fishing again, particularly when I see that the rockfish program controls every other fishing that is out there. For example, you talk about the Marine Protected Areas where you really didn't, but there really hasn't been a definition that I have been able to determine. For example, I've heard of locations that are typically places that we fish salmon like Jefferson Head, like Point No Point, on and on and on. There's a list of multiple places that are on the table as far as Marine Protected Areas. If that's a place where we can't go to salmon fish, that fishery is totally gone. If, in fact, we have Marine Protected Areas, what is your plan to label it? Is it a GPS way point? Is it buoys? I don't know what you have in mind, but I know this, that we have offshore (sheet?) closure off LaPush with GPS way points. Most people that do that have bigger boats, they have a lot of equipment, and a lot of them know how to identify GPS. If we have it including the Sound using way points, you better have a full-time class telling people how to read a GPS or it's not going to do any good. Are you going to have monitors out there to say you can't come in here to fish? I don't know. Do we have the finances available to afford enforcement? I don't think you've probably talked about it. Maybe you have.

But like the first gentleman said I know that, Greg, we met with you up in Fife here months ago, and we uncovered the fact that that groundfish program that had been written in 1998 was to be reviewed and updated every five years. We're doing it now. And, now there's a rush on it because it's got to tie in with the Puget Sound Chinook program. I think that probably you're under pressure to get it done, but it is unfair because the length of that document, when you're looking at 105 pages to begin with and probably it's grown longer, there's nobody that can totally understand it other maybe who's taken a fulltime task at it, and that's our friend, Bear. But, we do need more time. And it's a simple statement, but I know that you have a deadline, but we need to stretch it because there's got to be too many parts of that program that have to be really be looked at by those of us that are seeing sometimes double language in the document. Okay. Thank you.

Wayne Palsson: Thanks very much Tom. David Smith.

David Smith: Hello, my name's David Smith, from Tacoma, Washington. I'm a biologist, not at the Ph.D. level. I've been studying rockfish in the sub-tidal environment, mostly in California to Baja, and now in Washington. I work for a public agency which I can't represent in this conversation, but it does involve the educational and conservation aspects of Puget Sound and its local inhabitants. And, as a diver I get to see a lot of the environment that some people don't see, and I can tell you that it has been affected quite heavily over the years. I'm not about assigning the guilt or fault or any of those things like that, but the point is the problems already here, the main damage has already been done. And, with these species that are so long-lived and so slow to mature, we're not going to see recovery in some of our lifetimes. These fish live way too long [for that], and I know that's a bummer for a lot of us. Part of my job involves acquiring some of the animals from the environment, and I'm sure that I will be prohibited from taking some of them as well, so that's going to affect my job as well as other recreational opportunities and education and conservation. But, in the end, I still have to support all these initiatives if not even more conservative ones. This damage, again, is going to take a very long time to fix, and I do support recreational activities, fishing, what have you, commercial activities, but it has to be done in a sustainable way, and without that, it's not going to work. Again, being a diver and seeing these Marine Protected Habitats, they are amazing, and as you move from one place to the next you come outside of those borders even though the topography's the same, the habitat is nearly identical, the fish population, the fish densities are totally different. In regard to economics, especially these days, I can totally understand that, but it's kind of like planning and budgeting for the future. And, you know these days you can't go out there and just take everything and worry about how we're going to pay it off later, we've got to pay it off now, and budget what we take and plan for the future. So, that's all I have to say. Thank you.

Wayne Palsson: Dave Binder. Doug Binder or Bender.

Doug Binder: Hello, my name is Doug Binder. The plan for the restoration at this point has not taken into account the Northwest Straits Commission project to remove the 4,000 plus gill nets in the Sound, and I wanted to make that point. The draft plan estimates that 61,000 rockfish have been caught annually in the ghost nets many of which are just being removed. I would like to know what the, if the increase by not having the ghost nets, how long you would stretch that out, would the goal for recovery be open-ended where you have a set number of time, a set number of quantity of fish? Thank you.

Wayne Palsson: Next we have Jim Tuggle.

Jim Tuggle: Thank you. My name is Jim Tuggle, Tumwater, Washington. I'm a member of the CCA government relations committee, and I'm the legislative chair for the state board of Puget Sound Anglers.

Quite simply, this is a very complex plan. It's far-reaching. It will have far-reaching effects on what we do for a long time in a lot of areas. It's not just about rockfish. As I suggested, if we take a better look at the ecosystems approach to this it could have even further effects. It's absolutely essential that the comment period be extended to a minimum of ninety days, if not longer. I'm familiar with the adoption of these plans that have far-reaching effects even on places like the John Day River basin in Oregon and they have like a year-long comment period. So I am imploring the Department of Fish and Wildlife, since this is such a complex issue and there needs to be time for study and comment, that you adopt a much longer comment period, and I'll reserve my other specific comments Greg, when I can have more time to look at and we can consult our respective organizations. So, please consider that.

Wayne Palsson: Clint Muns, please.

Clint Muns: My name is Clint Muns. I'm director of resource management for the state board of Puget Sound Anglers. I also represent the Recreational Fishing Alliance.

There's a lot of information in this document. I can't say that I've read every word in it, but I can tell that there's a few things that really stood out and one is that, you know there are commercial fisheries activities in the eastern Straits of Juan de Fuca, the San Juans, that appear to be getting a pass. They're not being scrutinized at the level they should be when we consider that we need to look at the high-impact stressors and I think the past fishery removals is one of those. The derelict gear, I mean I'm looking at these the stressor part, and there's two high-impact areas: derelict gear and past fishery removals. By putting the commercial fisheries under regulations that would significantly reduce and/or eliminate their impact as Jim Tuggle mentioned earlier. Even on lower levels in the food chain. The derelict gear – you know I know money's tight, but there has been money coming forth to remove derelict gear, and I don't know that the Department is prepared to move as fast as they could if that money was available. Those two things would have the biggest impact on reducing stress on these stocks.

Another thing that really stood out that made me nervous is the Marine Protected Areas and the lack of specific definition of what that is. It's been my opinion for some time that we need to use science to identify when closures need to occur, why they need to occur. Set goals. Have specific evaluation points and provide for a sunset when the goals have been achieved. What's the target, and how do we get there? Those need to be done. Nothing like that has shown up in this document.

A couple of other things that are a little more vague: interactions with resident salmon, delayed release is a misnomer, that is a hatchery component of a naturally occurring phenomenon in Puget Sound, which is fish that do not leave the Puget Sound. These are as much a component in Puget Sound as any rockfish. They're also at reduced numbers, although one of the things that I caught in that document, it indicated that there were 21.2 million delayed-release salmon per year. I think that number is about ten-fold. That needs to be corrected.

The interaction with lingcod is another one, and being involved with the Puget Sound Recreational Fisheries Enhancement Oversight Committee, we've been involved with the research project that's going on at NOAA, and we had a lengthy discussion, and Greg you're

aware of this, about which species we might want to look at and lingcod came out because as a Recreational Oversight Committee, lingcod was a preferred option, but at the same time just like with the delayed release there are, with the delayed release there are hatchery programs with the lingcod that's being looked at as whether that's a viable option, as you described earlier. But to restore these fish within Puget Sound, they are no less important than the rockfish.

So, some of the wording in this document seems to indicate putting rockfish as the priority fish, and having major effects on all other fisheries that occur with no consideration for that. I'm concerned that some of the wording in the document points towards reduction of yearling production, the delayed release of resident fish, I'm concerned that some of the wording in there indicates that there should be less focus on whether or not we can recover lingcod stocks in Puget Sound, and those are cases of wordsmithing. I think that's all I had for tonight. Thank you.

Wayne Palsson: Thank you sir. Frank Betrozoff.

Frank Betrozoff: I'm going to write my comment.

Wayne Palsson: Okay. Sir, Henry Valz.

Henry Valz: All right, so I'll do my best to make my comments brief; go home. I have a 3-month old. And actually speaking, kind of, for my 3-month old, I suppose, and as a SCUBA diver I'm really deeply concerned about the survival of, you know, not so much copper, quillback, but we're talking about species yelloweye, canary where observations used to be pretty common for those fish and have become near absent, so I have a lot of concern about, quite honestly, the extinction of these species, especially in South Puget Sound where you're talking about an area that has very little exchange of water with the outside environment. Salmon may travel across that barrier, but there's very little larvae that come in from rockfish to re-propagate South Puget Sound. So, even the best environments available simply aren't getting the larvae necessary to survive.

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I'd also encourage Fish and Wildlife to really look at smarter fisheries techniques: increasing the hook size for the lingcod fishery; considering alternative hook shapes. We have rockfish which have a much smaller mouth, have a much smaller ability to take a hook compared to a lingcod, and I'm a recreational lingcod fisherman as well as a SCUBA diver, and I think that that's an important fishery, and I understand that and that's the reason I think that we should look more elaborate and smarter ways to control the fishery.

Finally, I'd really like to say that Marine Protected Areas, while I understand the opposition especially from people whose livelihoods depend on fishing, there are also livelihoods that depend on SCUBA diving for instance, at Edmonds Underwater Park there is a dive shop which exists in one of the worst environments for rockfish that exists purely because of the establishment of a Marine Protected Area and a, actually artificial reefing but the opportunity for rockfish is surviving so there are SCUBA diving shops including the one that I worked at that have closed down because the alternatives in Canada become so much better and that's something we really need to consider though I appreciate, CCA, your concern. All right, thank you very much.

Wayne Palsson: Frank Eshpeder, Eshpeter, I'm sorry.

Frank Eshpeter: My name is Frank Eshpeter. I'm president of the South King County Chapter of PSA and the Sea-Tac Chapter of the CCA. I'm a recreational fisherman, here to speak on my own behalf and my future grandchildren.

I'm a little alarmed at the amount of time we have to review this and I urge you to, once again extend that time to ninety days plus. It's a big document and it's hard to comprehend everything in it in a short period of time.

A couple of things that really alarmed me; one is on page two, it's just a simple statement, "This could require significant reduction in fishing opportunities for other species including salmon, lingcod, and halibut." That's very alarming for this plan.

As Tom spoke, I'm concerned about the lack of good economic study, there's a lot of jobs at stake if these Marine Protected Areas go into effect. There's millions of dollars that come into the state from recreational fisheries. A lot of jobs at stake. Kind of almost like cutting your own paycheck for you folk. I think we need to take a look at some of the commercials. We know that there's still some bottom draggers. That seems, that should be considered as a high stressor, and they should be banned. There's no need for that.

I believe the fisheries management including the recreational fisheries management should be data driven. It's important to remember that the recreational fisheries and commercial fishery are prospected very differently and should be surveyed differently. For example, a commercial fishery can be sampled a garbage can at a time, but recreational fisheries are one hook at a time. Thank you.

Wayne Palsson: Ken Kumasawa.

Ken Kumasawa: Ken Kumasawa, and I'm a member of the anadromous and marine resources sport fishing advisory group, and I represent the concerns of three PSA fishing groups, and a member of CAA, but I also speak for myself as a recreational fisherman.

I look at the groundfish conservation as I do anadromous fish from a gestalt holmas. The following is my definition of gestalt holmas: Here, too, we find fisheries management, co-management science intent on using a systematic collection of data yet often excluding through that very activity precisely that which is most vivid and real in the living natural phenomena of groundfish and anadromous fish it manages. Somehow, the thing that matters has eluded us. The ultimate responsibility of this plan rests on the shoulders of our new director, Mr. Phil Anderson. I would not like to see him burdened with the negative ramifications and potential legacy of this plan early in his tenure as director. The plan is designed, as designed, impacts the economy of the state of Washington for a long time, and because of no specific, measurable results really makes the Washington Department of Fish and Wildlife the largest stressor of groundfish in the Sound.

The first failure is to not look at nature's wholeness for fisheries and the current information for timed, achievable opportunities to conserve, enhance, and sustain groundfish; second, the failure to classify correctly and recommend measurable solutions to all stressors of groundfish decline; third, the failure to quantify the economic impact to the state of Washington; and fourth, the failure to allow adequate time to consult with the public sector. To accomplish a measurable, achievable, and timed Puget Sound groundfish management plan with low economic impact, I request the following four items: I request a full 90-day plus for designers of the plan to work with a select citizen's group committee, to design a plan with specificity and measurable

outcomes in a near-term timed research oriented management plan and to accomplish this I really recommend working with the CCA groundfish project committee and a select group of identified individuals for these workshops; to avoid being labeled the largest proactive stressor, I request a reclassification of the stressors and specific achievable solutions recommended with timetables; I request that a hatchery groundfish supplemental program be researched and implemented in the plan to augment natural reproduction, and thus jumpstarting the recovery process; lastly, I request that this group follows state administrative procedures to conduct a full economic analysis impact on small businesses, the Washington Department of Fish and Wildlife, and the 461 billion dollar recreational economic value to the state of Washington over the life of the untimed, ambiguous management plan if it is accepted in its current form.

Wayne Palsson: Thank you sir. Mike Abbott.

Mike Abbott: That's a tough act I have to follow there, huh? My name's Mike Abbott, and I'm a concerned citizen, and I am a member of CCA.

The thing that I most disagreed with and everybody said here tonight, everybody said they want a sixty or ninety-day extension. I don't think that's long enough. I mean this is one of the most complicated problems, and far-reaching problems that we're going to tackle as people of this state, and I don't understand the rush to make such a big decision. Everybody here has been through all the trials and tribulations of the declining fish in this state for years and there has been many attempts to cure things and to curb things and to fix things and we've made mistakes and everybody knows it and so I really think that pausing and maybe looking or discussing or talking this for a longer period is a wise idea. Not that there is not wise people, but I, so my question would be, "What would be the harm in extending this period and discussing this a little further, I mean what would be the problem with extending this?"

And one other, another question I have is, groundfish populations worldwide are down, I mean the grand banks are pretty much wiped out. There's been huge emphasis to try to understand that, they have the same problem in the North Sea, and I haven't heard any comparisons to what you guys are trying to do to the other places in the world where they are trying to bring back groundfish or rockfish or these kinds of things, and I just wonder if you have studied their failures or their successes and compared what you're trying to do or are you or is this totally out of the box or is this, you know, more of the same so…I'd like to hear that part of the discussion and I haven't heard that at all. That's it. Thank you very much.

Wayne Palsson: Thanks Mike. Doug Myers.

Doug Myers: I'm Doug Myers. I'm the director of the Science of People for Puget Sound.

I'd like to applaud the Department for putting together probably the most comprehensive fishery management plan I've ever seen, but I'm also a bit concerned that it's almost too comprehensive to actually implement. In its current form, I believe the most important piece of the plan is the adaptive management plan and maybe that needs to be the first part of it because I feel like many of the actions are premature because I don't think we have enough information on all of those things yet. I was a little concerned that some of the scoping comments, you've mentioned Greg, the most comments you received on the plan were about the climate change issue but none of the actions really address it that I can see. The plan may have considered it, but I didn't see it result in any actions. The one thing I did see about about, in the scoping comments about hatcheries is to not do them, but yet hatcheries as a management measure is recommended so I believe some

of the actions of the plan may be a bit dubious based on the amount of information we currently have.

I'll have some very specific comments on that especially of the table 3 of which of the conservative or less conservative options chosen as the preferred plan. But, I feel like the Department needs identify partners with which they can more directly. I think some of the habitat information could be gained by working with USGS who has very good bottom typing that has to be de-militarized through the Department of Defense and some of the other things, and I believe some of the stock assessment information could be improved upon. I think that some of the ideas that others have shared today about having a quantification of your expected results from implementing the actions is a good idea and should be stated as hypotheses and then adaptively managed as those actions are taken. So, I'll be putting some of this together in comments and I would agree with many of the others that an extension of the comment period would be welcomed because there's an awful lot to digest in this plan and I believe a more strategic way of implementing it could be devised if we all had a chance to plug-in and maybe even offer some of our help as partners to the Department on how our particular agencies and organizations could help with certain pieces of it. Thank you.

Wayne Palsson: Bear Holmes.

Bear Holmes: I'm Bear Holmes. I'm going to speaking here today on behalf of CCA. I'm on the government relations committee of the state board and I'm the chairman of the Puget Sound Marine Enhancement Committee.

I would like to correct Tom that I do not have a full comprehension of this plan, but I have spent a good deal of time reading it and I have, I'm probably more familiar than most, than the average fisherman with the plan because I've put a lot of time into trying to comprehend it. Before I get into the prepared statement that I'm going to read into the record for CCA, I have one question and that is that we found out last Saturday, when Phil Anderson was on the Outdoor Line radio show that the Puget Sound Rockfish Conservation Plan is somehow tied to the Puget Sound Chinook Harvest Plan. That was the first time I've heard of that and if you guys could get me an answer on why they're connected or how they're connected, if you could get me that sooner rather than later, it would be really good so that we could try to figure out how the two of those plans work together or why they're dependent upon each other? Okay.

CCA Washington supports the need for a rockfish conservation plan and supports the use of rockfish recovery areas as part of that plan as supported by the best available science and existing and future data. We have additional questions and concerns surrounding the proposed plan. Much of the Puget Sound Rockfish Conservation Plan concentrates on past stressors and does not adequately address more current issues. CCA Washington recognizes that past practices by both commercial and recreational fishing were likely high stressors and adversely affected groundfish populations. However, CCA would like the Department to consider acknowledging <u>all</u> of the current stressors with equal weight. The Department's own science indicates seal predation is the number one stressor on Puget Sound rockfish populations, yet the plan lists it as moderate. CCA Washington further believes the food web due to the seal and sea lion predation should be listed as a high stressor on Puget Sound rockfish; 2) the proposed plan does not direct, it does not address direct or bycatch encounters on key species of rockfish associated with the existing commercial and co-management commercial fisheries. Specifically, there's no mention of bycatch associated with commercial fishing gear. Because many of the

ghost nets associated with commercial fishing are located on complex high-relief structures, which is considered ideal rockfish habitat, it is logical to assume past, present, and future commercial fisheries have a high encounter rate and a near 100% mortality rate. Current efforts being performed by the Northwest Straits Foundation to remove derelict fishing gear has not been factored into the recovery plan and proposal; 3) the proposed Marine Protected Areas, rockfish recovery areas, fishing depth limitations, reduced catch limit, and additional restrictions as proposed in the recovery plan will significantly expand the Department's enforcement requirements. CCA Washington is concerned these additional enforcement areas and associated costs that have not been fully explored and will, in turn, potentially dilute the proposed intentions. Can the Department detail the proposed economic impacts to the state? 4) CCA Washington supports the need for a rockfish conservation plan, but wants to acknowledge there's significant issues overlapping the rockfish conservation plan with other species such as salmon and steelhead. Restricting all fishing as acknowledged by the plan has the potential to limit commercial and recreational fishing opportunities. Limiting or eliminating these fisheries may allow more mark-selective salmon to reach the terminal areas which could, as an unintended consequence, result in more pressure on the ESA listed Chinook and other threatened species. CCA Washington would ask the Department to fully detail the effects that Puget Sound Rockfish Conservation Plan will have on the ESA listed Chinook salmon and steelhead; 5) CCA Washington is concerned about the transparency and stewardship of the public involvement process in the proposed plan. The abbreviated public review and response period are insufficient for adequate response. There has been no record or transcript of a question and answer period in the public meetings. In addition, there is no statement of fiscal and economic impact which counters the request from the Governor to explore and define economic impact changes to non-treaty commercial and recreational fishing to the citizens of the state of Washington. The proposed plan carries potential significant negative impact to both the economy of the state and the costs associated with the enforcement of the plan by Washington Department of Fish and Wildlife.

And, finally, information contained in a public disc, in a publication distributed at the Washington Department of Fish and Wildlife public meeting on October 29 in Mill Creek contained some information concerning CCA's position on MPAs that may be incomplete and misleading. The following statement is the official position on Marine Protected Areas and no fishing zone as outlined by the Coastal Conservation Association: *CCA Washington following CCA's national policy does not support MPAs unless there is a clear indication that recreational fishermen are the cause of a specific conservation problem and that less severe conservation measures such as gear restrictions, possession limits, size restrictions, quotas or closed seasons will not adequately address the targeted conservation problem. The closed area regulation includes specific measurable criteria to determine the conservation benefit of the closed area on affected stocks of fish and provides a timetable for periodic review of the continued need for the closed area at least once every three years, and unless the closed area is no larger than which is supported by the best available science, and unless provision is made to reopen the closed areas to recreational fishing whenever the targeted conservation problem no longer exists.* And that position statement can be found online at join CCA.org positions. Thank you very much for your time.

Wayne Palsson: Thanks Bear. Laurence Bucklin.

Laurence Bucklin: Evening. My name is Laurence Bucklin. I'm a member of CCA. I'm also a member of Puget Sound Anglers, Gig Harbor, and I'm their government affairs board member. I'm here though tonight, speaking on myself…on my own accord, taking notes and I will be reporting back to the board for PSA, Gig Harbor, and that goes to reaffirming everyone else's comments about extending the period.

We simply don't have enough time to assess, get here, discuss, go back, make recommendations to the membership for them then to look and make their own comments. I think that's why we're in existence, a big part of it, and I understand that may have an impact on your needs, but on the other hand, I'm sure it will help all of the stakeholders feel that they have more of an impact on this and will be more willing to play ball in the long run.

Now that that's out of the way, to get back to the issue of paragraph 2.7.7 that falls under your area of food web impacts, and specifically the failure to include predator reductions, specifically harbor seals in the plan. Now I feel that even though the numbers at 2.7.7 are, have some erroneous figures in them and they don't provide pieces of information that allow for myself and others to arrive at the an absolute number of rockfish consumed each year, if in fact, rockfish in Puget Sound are eating 28 million pounds of food based upon calculations of the numbers that are provided the impact in the literature says they're having an impact on rockfish recovery. That's a fact, and if it's 12%, you're still at over a million rockfish a year. Again, we discussed this earlier, but it has to have an impact, it's certainly a much higher impact than the other factors that are considered to include recreational fishing and derelict gear reduction. I'll add more to that in written comment. I'm concerned the draft Environmental Impact Statement does not properly provide a true impact on our fishing opportunities. What these MPAs will be, where they're going be, the magnitude of them, so that we truly understand what the ramifications may be of this, whether it's intended or unintended, the law of unintended consequences may well be lurking on page two of this document. So, that is also a concern. I think those issues need to be fleshed-out in this plan, and I'm going to recommend that you not include marine reserves or Marine Protected Areas, they have got a bad taste in most people's mouths right now with what's going on in California and what's going on in Oregon. To have them incorporated in a recovery plan like this, we don't need to be fighting over those. We need to be looking at how to do the job and rockfish recovery areas would seem to be a viable alternative. Finally, I like Ken's [comments], but I'm going to add one thing to it, I'm going to suggest that with a collaborative effort with all of the players at some point during what we hope is an extended comment period that we end up with a new draft proposal for review. I think the comments here are too extensive, the changes are going to be too extensive to simply move forward and generate the final plan. So, again, recommend a revised draft to be put back out for review and comment. And, that's it. Thank you.

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Wayne Palsson: James Glasgow…Jamie Glasgow.

Jamie Glasgow: Jamie Glasgow. Director of science and research for Wildfish Conservancy. I have a master's degree in fisheries from the University of Washington. Wildfish Conservancy is a non-profit fish conservation organization got about 3,000 members statewide. We do research in fisheries throughout the northwest.

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I'll start with a question, I want to make sure that the answers to the questions that have been asked so far, will be made available to everybody, right? They're not just going back to the

individuals who have asked those questions. Greg: That's right. Jamie: Okay. That will save me from being redundant.

Then just really three points I want to make: The first is a point that was already made about the geographic scope of the plan. I just want it on the record I would like to know, we would like to know why the 1998 Puget Sound Groundfish Management Plan and the 2009 Biology and Assessment of Rockfish in Puget Sound, both of those documents include the Straits west to the Tatoosh. Why was the decision made to exclude the Straits west of Sekiu from this 2009 Puget Sound Rockfish Conservation Plan?

My next comment has to do with how we manage in the absence of data. I think we've all been told and can appreciate that there is a lot we don't yet know about rockfish populations and the document that the management plan addresses that issue by stating on its first page that "*It is the intent of the Commission, that under conditions of low stock abundance or insufficient information to assess stocks, the Department of Fish and Wildlife should elevate the level of conservation in groundfish management.*" Now this is a pretty common idea and one that a lot of people like to write about. It's also called the precautionary principle and it says that when we don't have all the information we need we ought to play it pretty safe and make some assumptions if we need to on the conservative side of the issue. The Biology and Assessment of Rockfish in Puget Sound, 2009, emphasizes that many aspects of specific rockfish stocks are poorly understood, for example with regard to bocaccio, on page 653, 6-53 the report states direct surveys and further studies of these species will be required to better understand their stock status in Puget Sound and adjacent waters. And, I guess that we could say something like that for almost every one of the populations. However, on page 26 of the Rockfish Conservation Plan, bocaccio are assigned a precautionary status, not the more conservative, vulnerable, or depleted status. That concerns me. And, there are other examples of uncertainties and insufficient data brought to light in the Assessment Report that are not met with the promised elevated level of conservation in the current draft of the Rockfish Conservation Plan. So, I would like to know if the precautionary principle is alive and well at Department of Fish and Wildlife or is it empty rhetoric?

My last point would be the simple question of what has changed since 1998? The Department's Puget Sound Groundfish management Plan, 1998, is what is driving the rockfish management of rockfish at this point in time as we've heard. Promised us a process to maintain healthy groundfish populations in Puget Sound. That's straight from the document. Clearly this process has not been successful, and now the stakes are even higher. What assurances do we have that ten years from now, we'll not be in this room looking at more graphs of declining rockfish stocks and discussing the populations we've lost? What is going to be done differently this time around as opposed to back then to ensure success?

So I'll end with that question and look forward to the responses. I guess, let me also add, that we, too, would like and be very supportive of more time to digest this information, and we'll be providing written comments as well. Thank you.

Wayne Palsson: Jerry Merritt. Are you going to?

Jerry Merritt: Yeah, I'll submit comments in writing.

Wayne Palsson: Richard Fike also indicated he…

Richard Fike: Yes, I'll write mine.

Wayne Palsson: Frank Haw, you had a question mark?

Frank Haw: No, no thank you, I'll wait.

Wayne Palsson: And Brett Clubbe?

Brett Clubbe: I think my comments have been covered by everyone. I'll submit it writing.

Wayne Palsson: Well that covers all the people that indicated yes or maybe that signed up on this list. Is there anybody else who would like to make a comment? Well, it's 9:00 almost straight up.

Greg Bargmann: Thank you all for coming.

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Wayne Palsson: …again, we're going to take your comment and we're going to respond to it directly and it will be available to you and the public so it's important that we have a mechanism to get the comments back to you so it's important to have your name and address here.

Greg Bargmann: So it is important, and this is part of the SEPA process now. It's a formal requirement, so anything you say now will become part of the record and we will respond to it. It may not be individually. If we get several comments that are virtually the same, we can put them together, but this will now be part of the public comment period, and I think what we'll do is have the people that signed up, give them the first opportunity to speak so Wayne will call off your name and we'll pass this to you. It's important that you give us your name and if you're speaking on behalf of an organization it would be great. If you signed up on one of these sheets, you don't need to give us your address or anything, we'll be able to get back to you, but if you haven't signed up, then we'll need to get your address from you. So, this is part of the SEPA workshop, and this is November 6 and it's in Port Townsend. This is a public comment period.

Wayne Palsson: Okay, Dennis Pownall?

Dennis Pownall: Yeah.

Greg Bargmann: Dennis would you take this please?

Dennis Pownall: What do I do with it?

Greg Bargmann: Put it down and just talk. It's a microphone.

Dennis Pownall: Okay, anytime the Department has an idea about establishing a one-fish rockfish limit, I think it's to everybody's advantage to just close that area. There's no point in going out and trying to catch a single rockfish when your chances are very good at catching one that's only four inches long and that's your first legal rockfish. Why endanger the adult at all for one fish if there's not enough to keep? That's all.

Wayne Palsson: Okay, thank you sir. Okay, Mr. Krause.

Mr. Krause: I'm going to be submitting written comment.

Wayne: Okay. Mr. Baker.

Norman Baker: I think I will make my comment written too, at least the more extensive comments.

I do think the plan is very good in its overall structure, but the thing that impresses me is the education. Recently at Puget Sound Anglers we had a couple of guys come in and give us a talk on aquatic reserves. As talks go, it was a good talk. Unfortunately as an environmentalist I thought they missed the boat. The reactions amongst our group ranged from, "What's the point

to an aquatic reserve?" all the way up to "You have got to be kidding, we already have no fish docks and now they are going to take away our premium fish spots? No way!" To get marine reserves in place you guys are really going to have to put together a really exceptional program explaining the benefits and the future rewards of having a marine reserve program. That talk on aquatic preserves peaked my interest when they started reading these two things, and they complement the state of Washington on their aquatic reserve program, but they also point our marine reserve program is surprisingly small and we are way behind Oregon and way behind California and way behind most other large states that have significant marine coastlines. I question your point about spillover from marine reserves repopulating the rest of the Sound. This guy makes the point that if the marine reserves are large enough and given enough time, there is significant spillover to repopulate depleted areas, and he makes a very significant case for it. My impression of the whole plan is, this is one huge project, and like every research scientist that I have met including myself, you guys have enough projects for 15 lifetimes (slight laugh) coming in this whole project. It's going to be tough to get this whole project past the recreational fishermen. If I were you, I would institute a much more aggressive educational program so it, on your website there are an easy alternative to bringing in speakers about this whole program and make them available to coastal conservation associations, to Puget Sound anglers, to all these environmental interest groups that are interested. In Sierra Club, my local group had no idea what marine reserves are and how they function. Just no idea at all, but you read these two books, and you begin to appreciate exactly what they can do.

Now my, in a prior life, I was in Department of Entomology, Fisheries and Wildlife in Minnesota. Before that, I was in Michigan. Before that I grew up in Florida. And, I fished in many of these areas that are now marine reserves, and I recall what the fishing was like before and after some of these reserves became real and boy, I'll tell you the public here in the state of Washington does not [know] marine reserves and fisheries reconstitution does. My impression from reading these two books is marine reserves are the final piece of the puzzle for true fisheries management because they actually retain the genetic structure without genetic drift that we see in hatchery operations and fishing operations that occurs in all the fish species that we're after.

Wayne Palsson: Thank you, sir. Mr. Don Dybeck.

Don Dybeck: Okay. Don Diebeck, a Port Townsend resident.

My first look at all of this started this afternoon about 3:00 so most of this stuff is totally over my head, however, I have one question and a couple of comments. One, if, I am just curious about how the research has determined, if it has, that the declines are due to the actions of the sport or commercial fishermen as opposed to a huge variety of environmental factors that are maybe not yet identified. I think your, you're leaning in the direction or at least are talking climate change, and I think that's a good thing, but my other question or concern is, is regards economics. I said earlier that I'm a serious sports fisherman and for the last six or seven years I'm spending the vast majority of my sport fishing dollars in British Columbia. In regards finance, apparently there is a substantial budget for, and there's a process in place to remove derelict nets and it seems to be that's something that's already happening that could have a tremendous positive

impact. And, the one thing I heard tonight that sounds very simple and very cheap regards hook size. Why not restrict hook size as opposed to depth? And, that's all I have for now. Thanks.

Wayne Palsson: Thank you sir.

Isaac Buell: My name is Isaac Buell. I'm a sport fisherman out here in Port Townsend. My comments and concerns regarding the rockfish regs that are presented in here are, the thing that stands out to me are things like education, like maybe a lack of education for sports fishermen in general. You know, we probably weren't aware as much as we could be of the situation that we're confronted with now that there's such a serious problem with the rockfish. You know, 'cause there is a lot of people out there targeting them or, you know, I guess killing them and not really being aware that there's such a problem so I'm really concerned that maybe there should have been, or there should be, more education presented to us, and, you know, before we're slapped and before we're faced with, you know, something as serious as regulations of not being able to fish deeper than 120 feet. So, that's something I'm really concerned about is that there is the lack of education and there could be a lot more I think could be effective, and that combined with a zero bag limit, you know, not being allowed to fish for them at all. I think that would really help. And, instead of having just, you know, being able to go after one because that allows for people to target them, so if we are not targeting them at all I think that would help quite a bit. I think that's it.

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Wayne Palsson: Jason of Cle Elum? **Male voice:** He left.

Wayne: And Mr. Kilburn?

Mr. Kilburn: Yes. Hi, my name is Edward Kilburn and I live here in Port Townsend, and I'm a recreational fisherman.

I think it's an excellent plan what I have seen here tonight. I do have a couple of questions about it. One, I think that the removal of ghost nets is an excellent idea and it must be continued until Puget Sound is as ghost net free as possible. I wish there would be some way we could identify who put the nets down there first of all and send them a nice little bill for cleaning it up, but I know that's a pipe dream.

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I have a question, the one key element to this plan that you're proposing seems to be enforcement and I am very, very much concerned because of the reduction in state budgets and the lack of funds available. Where are we going to get the money? Where are we going to get the money to put the officers out on the water to get the enforcement? And, I think that's something that we really, really have to look at, not only with the recreational fishermen but also with the commercials because I know, and a lot of the gentlemen here know, who fish out on the ocean that a lot of the time the bycatch is never recorded, but simply dumped over the side, and a lot of the bycatch is groundfish, is the rockfish that we're trying to protect, so, again, I think that we really need to look at enforcement and we really need to look at getting the dollars to pay for enforcement. Thank you.

Wayne Palsson: Thank you sir. David Croonquist.

David Croonquist: My name is Dave Croonquist; I'm with the North Olympic Peninsula Chapter of Puget Sound Anglers. I also sit on the Enforcement Advisory Committee and the Puget Sound Recreational Fishery Enhancement Oversight Committee. And, I will be submitting written testimony too, but just some general comments on this process.

It started in June of 2008. The first chance the public had to see even the draft statement is October 16th of 2009. No indication as to who was involved with the scoping process where the guidelines were developed and then who made the decisions on the guidelines.

Seems to be a lot of interest in viewing activities and there's, there are divers in the Puget Sound area, but wildlife viewing, particularly fisheries viewing on species that inhabit depths greater than five feet is going to be extremely limited so I wonder, you know, that's kind of a reach.

There's some questions as to the spawn capabilities and is there, what's 50% spawn level versus 100% spawners?, and if that's the case, and if there was a regulation allowing take, might the agency look at size limits or slot limit that would protect the larger fish and keep the opportunity open for individuals to catch fish below the optimum spawning size?

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The question has been raised about enforcement, the law enforcement staff of the Department of Fish and Wildlife is about 60 positions less than what they had when there was a Department of Fisheries and a Department of Game. They currently have seven vacant positions that aren't going to be filled because the current budget process problems. No telling when they're going to be filled, but enforcement always seems to take the hit, and they're the folks that need to be out there providing compliance levels.

I have some issues about the North of Falcon process and how this draft EIS proposal is going to impact the North of Falcon process this year. In light of that, and I've touched earlier in conversation about how the plan is going to mesh with NOAA plans, there's orca to consider, Puget Sound steelhead, Puget Sound Chinook, a recent listing by NOAA for green sturgeon habitat protections to depths of 300 feet that includes most of Puget Sound.

I just, you know this is a nice, broad, initial approach but the devil's in the details and I'm concerned that the timeline is too tight with 30 days for public comment to the current Commission regulation process in the works that's going to address the fishing opportunities and depths restrictions, there's no, either no discussion or very limited discussion in this draft plan on natural issues such as pinniped predation on rockfish.

The ghost net issue has been raised. There is money being currently spent on the MRCs involved with the ghost net removal, but that's a long range process. No discussion about commercial impacts and the problems the commercial industry had when they came into the Sound in the 1970s and 1980s and removed large numbers of the fish populations and who knows what damage was done to the substrate when they were dragging their nets.

Maybe things are not going to be as easy to fix as we would like, and I think the agency needs a cohesive plan for further review and not just piece-mealed through and it covers the whole issue

of Puget Sound, the NOAA potential restrictions, they discuss the Salish sea area which covers the Straits of Georgia, the Straits of Juan de Fuca, Puget Sound and you're talking international issues in addition to state issues and then where the Department of Natural Resources, Department of Ecology, Department of Health, Department of Fish and Wildlife, and the various federal agencies, NOAA, US Fish and Wildlife Service are all going to be involved in this whole mix and I think you've taken a big bite, but the timeline is just too short in a 30-day comment period. Thank you.

Wayne Palsson: Thank you. Ward Norden you had a question mark?

Ward Norden: Well, I wasn't sure because I wasn't sure what I was getting into at this meeting. About a half a dozen years ago I was invited to a meeting with the Oregon Department of Fish and Wildlife and the California Department of Fish and Game, down in Newport, Oregon at the Hatfield Research Center. That was when they were first beginning to face their problems with yelloweye and canary rockfish and bocaccio. They asked me down there for three reasons: one, I'd been in the, I had a sales route down there for twenty-five years and knew everybody, so I tended to be rumor control central being a wholesaler; two, a lot of the gear I make is for bottomfish; and three, I've made it no secret that as a writer for the last several years I, the last 20 years, I'm philosophically opposed to fishing for yelloweye and canary rockfish because I can't justify fishing for something that is older than I am. Anyway, they asked me, I was brought into this meeting as somebody to help them to try to minimize the impact of conservation measures on yelloweye and canaries. Minimize the impact on sport fishing and tourism because it's so important to their economies. And, they gave me a head's up, and I went to the meeting and suggested that they look at two alternatives. One they eventually did accept, sort of, and the other one they decided it was not, didn't make any sense to them. Probably, because they didn't know what they were doing. The first alternative I gave them was a limit on hook size, five-ought hooks or larger on any jig over three quarters of an ounce. That allows for, that makes an easy release and minimum damage. I suggested don't waste your time with barbless, it doesn't, these fish are almost bullet proof if you get them back in the water and its from shallow enough water. The other was to limit jig size. At this meeting I said two ounces because this applied all the way down to southern California. So, two ounces and for this area I would say three ounces inside of Ediz Hook because we have a different current climate here than they do on the coast. And, that would effectively limit the depth of fishing and limit the mortality on the fish you do catch. The alternative was to go with the depth limit and I suggested for California that it would have to be about 25 fathoms and for Oregon about 18 fathoms. And, they, both states decided to be a little bit more aggressive on that and I figured, well, they took that I thought they'll learn and that may come around and then I proceeded to come right back up here and tell my customers up here stand by, this is coming. It was the only way I could see to salvage it and to maintain recreational fisheries, and believe me they were not happy, the charter boat operators in Oregon were not happy, the charter boat operators and party boat operators in southern California were not happy, but the alternative was a complete elimination, and a complete elimination of their livelihoods to stop fishing, but those two alternatives were laid away to limit mortality on the fish they were trying to protect. Anyway, that's what I told them and that apparently is working fairly well and I'm very interested in the spawning success as being limited and since I do a newsletter on salmon return, projecting salmon returns based on plankton productivity it's, I'll be interested to see how the success of a lot of the groundfish do

with the increased and chain of shifts with the plankton off our coast and the increasing plankton productivity with the cooler waters that have been occurring since 1998.

By the way, I really like the six species concept. That is a great idea. I think that is a way to go rather than confusing things. You pick the key ones and go with it, but if you're going to preserve sport fishing the five-ought hooks and the limit on jig size is where you're going to have to go or the depths, and as far as jig size, you can enforce that at the boat watch. At least that's what they do in Oregon, what they were talking about doing in Oregon and that's where they do a lot of their enforcement there. Thank you.

Greg Bargmann: So, couldn't you have four ounces?

Ward Norden: Well, they didn't accept that. Three ounces is, two ounces on the coast. That limited for depth. Even with fifteen pound tests, you're not going get much, you're not going to be able to fish much, very successfully, beyond about 80 feet which I thought would minimize the contact with canaries and yelloweyes. And, it would also minimize mortality on their various coastal species; blues and blacks and all the others. Here inside, with the currents we have, three ounces gets you to the same place especially with the currents we have except in the a very still tide, and I don't see that many of those when I fish, darn it.

Wayne Palsson: So, there are a couple of individuals. Jay?

Jay Campbell: Ah, no.

Wayne: And also, Brian Oakland. He indicated no, nothing. That's fine. That's all the people who signed up. Anybody else I missed by any chance? Looks like I got everybody in the room. Okay. Well, thank you folks.

Mount Vernon Rockfish Conservation Meeting

Greg Bargmann: …So what this is, under the state law …every comment, it will be recorded and we will, understand now, we will respond to your comment. In the initial final environmental impact statement each comment will be considered, we will answer it. We may not answer it specifically like we have had a number of comments on marine mammal predation… (inaudible). So this is really your formal chance to do that. So, we will start. I'll turn it over to Wayne, and you have the microphone on?

Wayne Palsson: I think it looks like it's working, so actually what I'll do is serve you. Nathan Brandow? Nathan? So the way we're going to do this is initially we'll have a 3-minute buzzer go off. I'll have my watch beep and that will be the signal for you to start wrapping up your comments. I won't chop you off right then, but take another 30 seconds, another minute or so to provide your comments. And the reason we're doing that, even though we have a small number of respondents is to make it fair to the other meetings where we have had more people so that each person gets about the same amount of time. Don't forget you can also provide written comments, please. Anybody want one of these? Okay, so that's kind of the ground rules. And one thing I do is suggest to folks that when I have been giving public testimony and other things I do, if somebody has said the point you want to make its often good to say, "well I really agree with that," "I want to emphasize or ditto the comments made there," "but also I want to make these comments." That's a good way to use your time, but that's just one suggestion, it's not required.

Greg Bargmann: Before you testify, we ask you to give your name

Wayne Palsson: It's not testifying, it's providing comments.

Greg Bargmann: Providing comments, thank you. Before you give any comments, thanks Wayne, before you give any comment, if you would state your name, if you are speaking on behalf of an organization let us know that. Thank you.

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Nathan Brandow: Okay, my name is Nathan Brandow. I'm from the San Juan Islands, specifically Orcas Island, and to some degree I represent the charter company, Outer Island Expeditions. I'm here tonight to mainly speak about the rule proposed for Marine Area 7 which I feel is a direct connection to the overall rockfish plan here. I'm not exactly sure of the relationship to you, but to whatever degree you have an opportunity to reevaluate the proposals for Marine Area 7, I would encourage you to do that as I feel rockfish conservation is an important goal, but that the proposals would not really help you go in that direction. I feel as though you have a more significant amount of regulations in place to deny the retention of rockfish but not necessarily a proposal or a set of rules that will actually limit the take, i.e., every fish that is caught will be returned to the water. Most of those fish will still die. You may end up, I think, at least in my boats you'll end up probably more than doubling the number of rockfish caught because we will spend more hours fishing to retain other varieties of fish and the bycatch of rockfish will effectively be higher. Rockfish is not a viable catch and release species. Bottomfishing itself is not probably good catch and release, you know, atmosphere and shouldn't really be encouraged. I think you should have some limited retention. I think that in the past, the

one fish was a good rule. I think that you could be more successful and look at the Canadian model and close large areas from the get go rather than using a staged approach to get to closed areas and then repealing the rule. I think you will have a short-term negative impact on the fishery. Like I said, I do manage for bottomfishing charter boats. We do a high volume of bottomfishing charters. Most of these people would like to go out and have a basic fishing experience at an introductory level for kids and families to create opportunity, brings a high volume of dollars in, we try to teach people about the resource and to respect it. Obviously, the one fish is a pretty clear signal that we're trying to respect the resource and to pull that one fish is going to, like I said, have a net increase in the number of mortalities in the region. Most of the fishermen out there are, to some degree, targeting rockfish and will continue to fish for them regardless of these regulations. The 120-foot rule is just kind of silly. Large closure zones would be much easier to enforce and much more clearly defined, and the end results of that effort would be much easier and clearly measured. That's about it, and thanks.

Wayne Palsson: Mr. Aggergaard, right behind you.

Jim Aggergaard: I'm Jim Aggergaard. I live in Anacortes. I've actually got about 35 years working with Fish and Wildlife, so I'm not completely new to this. I appreciated the thumbnail sketch of the Puget Sound Management Plan. I think there were some extremely good ideas there except there were no specifics. It's kind of hard to make any specific comment.

The artificial reefs I think were an extremely a good idea and needed. We've needed it and the big bottomfish problems we have is lack of habitat. We've got a lot of muck bottom which does not provide good rocky habitat. A handful of old car bodies would make a good habitat if nothing else down there.

I think seals, predators, definitely need to be addressed in your plan. A population of seals which has greatly exceeded its niche takes far more juvenile rockfish probably than all of the anglers do out there every year. Probably by many times fold.

Depth restrictions, the 120-foot thing I think is, even that is too deep if you actually want to protect the quillbacks and things. If you drag one of them up from that depth you're going to blow his belly out and he's probably going to be dead anyway. You're going to have tremendous mortality no matter what you do for the spiny ray fish unless you get somebody to bring the fish up slow. The fishery for yelloweye and canary, you're never going to catch one of them at that depth, so obviously your 120-foot zone is going to protect them because you're never going to catch one, and any of the ones that do get caught incidental are dead. I felt for years that the state was complicit in wastage by forcing us to return those yelloweyes and stuff. If you catch one of them in deep water and bring him up, he's dead. And, as far as I'm concerned, the state's complicit in a wastage case. I used to write tickets to people that threw fish away; threw them in the garbage cans and the state's forcing us to do the same thing with those fish.

And I would like to have a lot more specifics really to make these comments as to specific things that you are wanting and trying to do. I think it's a good idea. We definitely do need to do something to help protect our rockfish.

I think if we're fishing lingcod, we ought to be able to fish deeper. My average lingcod fishery, and it's only a six-week fishing season at that, my average lingcod fishery is at 165 feet and I fish often times fish deeper than that and I do catch quillbacks at those depths and normally I can tell when people get one on. If I tell those people to bring that fish up slow, he will vent, blow bubbles, and often times then you can unhook him and he'll take off and go right back down. If you crank him to the top, he's going to blow his air bladder out his mouth and he's going to be toast. So there are things you can do and still during that lingcod fishery in order to have a successful lingcod fishery; we've got to be able to fish deeper especially in the San Juans. Out off the Washington coast, you've got a long, gentle, sloping shoreline you can have a depth restriction. I can be in 200 feet of water and only be 60 feet off of the beach. You can be fishing right along a cliff base, so how are you going to enforce 120-foot fishery in an area like that?

So, let's say that there's some big things that need to be addressed, and when you get into more specifics I would definitely like to have an opportunity to have a little more input when it comes to setting some more stringent type regulations in this regard. I'm sure I've exceeded my time. Thank you.

Wayne Palsson: Okay, Bear Holmes is next.

Bear Holmes: I'm Bear Holmes. I here tonight speaking on behalf of CCA. I'm mostly up here to thank you guys for adding these meetings. I know you did it at our request specifically. Marcus is the one you should blame for being up here because he asked for that request so his members could come and view this plan. I really appreciate it and I appreciate the work you guys have put into this plan. I think it's a well thought out, comprehensive plan. I don't like all of it, but I think you've done a fair job of putting it together. I look forward to the public process that you talked about last night, working with the citizen's advisory committee or whatever you call that group, and I would encourage you to develop some comment periods along, during that process. Not necessarily public meetings, but at least put things out on your web site when you think that we've reached consensus or you think that you've picked a direction to head. And then, I would really encourage you to have a short comment period prior to releasing your, prior to the implementation of your final document.

I'm well aware of the budget cuts that you guys have gone through. I'm well aware that you're going to have to go through more. I work for a state agency. I'm in the same boat. So, I appreciate you guys continuing to work along these lines, but I'm really concerned about this next group of cuts and how it's going to affect enforcement of any plan you come up with, so I would be looking to see a written plan on how you intend to enforce the actual plan when it's complete. That's all the time I will take. Again, thank you very much for adding these additional meetings.

Wayne Palsson: Thank you. Those were the three folks that signed up and indicated they wanted to give a comment, but we will ask again, the folks here who indicated a comment, but maybe you've changed your mind, this is a good opportunity to provide a comment if you wish.

Seattle Rockfish Conservation Meeting

Wayne Palsson: …that we can contact you back and provide information about any specific comments that you made or those that you have heard. So, it is a very important tool for communication for us to do that, okay? So, please sign in even if you have been here before, been at one of these meetings before. I see some repeat folks, you have to be here, you can't get enough of it, and that's great, that's public participation. But, please sign up on one of these sheets and provide us your communication address, email, and phone number. Okay? And, there's still one more sign up sheet there. And, I think what we're going to do now so that we do have adequate time to take your comments, is to go to that portion, and the way we're going to run this is to, we're going to have this digital recorder right here. Greg and I will sit over there and we'll call you up. Initially we'll give you three minutes to give your comments, so please be succinct and direct as possible, and I'll tell you from attending public meetings and myself giving testimony, if you hear a comment that somebody else has made and made it well you might just want to say, "well, I agree with so and so, that gentleman before, that person before, and then give a new type of comment to that so we get a good range of diversity of comments. That is just one idea. Anyway, you don't have to do that. If you want to make a point again, great. Okay, so you're going to come up here. I'll call your name, you'll come up here; I'll start the timer. You'll probably hear a little beeping sound once three minutes happens, so please start to wrap up your remarks at that point. Any questions about that? Great. And, what we'll do is a number of people – about ten folks have indicated, so far, that they are interested in making comment and that's, we'll call those ten folks first. If we have time we'll also give you an opportunity to change your mind if you want to give a comment you can do that at the end. I do remind you, once again, that if you, you may not want to give an oral comment, and change your mind and provide a written comment to us through those techniques. Okay? Alright then, there is a microphone up here, and we're recording. So, first person, we'll ask Mr. Frank Eshpeter to come up and give your comments. Oh, if you're representing an organization, particularly if you are speaking on behalf of that organization, please indicate so. Give your name again, and that organization.

Frank Eshpeter: My name if Frank Eshpeter. I'm president of the South King County Chapter of the Puget Sound Anglers, and president of the SeaTac Chapter of the CCA. I'm a recreational fisherman, and I am here speaking on my own behalf.

For a long time fishermen have supported temporary closed fishing seasons to allow fish populations to grow to optimum size. However, at the end of the closed season, fishermen expect most of these areas to be reopened to allow us to enjoy that fishery. Where fishermen have been involved, and development of these closed areas, and where they believe that closed area will actually increase the amount of fish, fishermen can be expected to support and comply to these conservation efforts. The MPAs do not seem to have any way to monitor or to have an end result that is beneficial to anyone for recreation use. I believe that fisheries management, including recreational fisheries management, should be data driven with up-to-date data and information. It is important to remember that the recreational fishery and commercial fisheries are prospected differently. They're serving differently and should be managed differently. Where nearly the entire commercial harvest is measured by the boat load, recreational fishery is measured one hook at a time. Good management depends on good data for good decisions. The

recreational fishery will be increasingly dependent on up-to-date data for good management. I have concerns about some statements like this could require significant reductions in fishing opportunities for other species including salmon, lingcod, and halibut. Or, restrict fishing gear such as downriggers, lures, and depth. The impact in dollars could be in the millions. Recreational fisheries fishing accounts for millions of dollars for the state. This could be a very large impact on many small business owners and could cause some to close, and people to lose their jobs. I didn't see anything in this referring to RCW 19.85 which is, I believe, required by law for any rule changes and it's a small business economic impact statement. I didn't see that any place. You talked about ghost nets. There's many organizations working on removing ghost nets, but we still have ghost nets being dumped in the Sound as we speak. Just wasn't too long ago we had a whale right out front of here stuck in a net. Where did that net go? We also have the bottom draggers that are still operating in the Sound and changing the habitat every day that they go out. Thank you for this chance to talk.

Wayne Palsson: Mr. Tom Pollock?

Tom Pollock: Okay. My name is Tom Pollock. I am with CCA. I am a sports fishing advisor for the state. I have been involved forever in this fishing activity. Presently, I am with SportCo, but I have been in the fishing tackle business for something over 50 years. I was raised in the Ballard waterfront. I come from the day where I remember when we could catch fish. What's happened hasn't happened overnight, but it's been years of going downhill, downhill. Finally, Greg has taken the initiative to start bringing back rockfish. I totally agree with what we're trying to do. Some methods that may be out that we have to really concentrate on and look at is things that probably are beyond our control.

Yesterday I was at the North of Falcon meeting, Greg was there again in one of his multiple meetings, you know, three a day is what he's taking I think. But one of the things he did point out is the biggest consumer of rockfish is seals and his brothers. They take somewhere in the area of a million fish a year out of the system. The next biggest user, and by the way, it's nothing we can do anything about. And, the carry capacity of Puget Sound was set at 7,000, we're 15,000 and growing. A concern I have is that if we do put out Marine Protected Areas and populate them, it's going to be a McDonald's serving rockfish to more and more seals and sea lions. Towards that 15,000, we're looking at 20,000. I don't know what we can do, but that's got to be a major, major thing that is out there. We all know it. I don't know what we can do, but we have to keep after that.

The second biggest consumer is the ghost nets, and as Frank did say, they are being removed. It's primarily one group, and I don't know how they're going to react to any change to what they do do, and that's the tribes. I don't know how the native Americans are going to take to recovery and reporting of their nets. I believe I've talked to Greg about this in the past, that any net that's used for any purpose in the Sound, commercially, should be labeled on the ground line 50 or 100 feet to tie into the license number of the boat. If it's lost, it's required to be reported. If it's lost and not reported, and discovered, that donor of that net should be required to not only pay the cost of recovery, but a major fine. These same nets can be inspected on the boat and they better have them tags on the net or they don't fish. That's a partial answer to slowing down the replanting of the nets.

The third major problem that we have is that of pollution. And, pollution we see it washing in every time it rains. Every body of water is bringing the pollution. That is something that is an ongoing project by the nearshore environmental groups, but that's a problem to where I know that, if I remember right, Greg was saying they're having a problem potentially in the Elliott Bay with some pollutants that come in, the females are acting like males or males are acting like females. And, it's nothing that anything has happened other than chemical reaction to them. The bottom of the totem pole is the only thing that can be done, and that's us consumers to fishermen. And, as Greg said, it's a major business in our state. It's going downhill. We used to be the fishing capitol of the world. Now we're not. We are all successful in bringing back rockfish like football teams and baseball teams and everything else, but we have to get something going. I totally support a rockfish program. It's got to be done.

The Marine Protected Areas I have a concern about as far as how are they going to be identified, how are they going to be monitored, particularly going to the meetings, I listened to Phil Anderson about a half hour yesterday and he brought out the fact that there's another shortfall of money again to the state Department of Fish and Wildlife like all governmental agencies. These areas have to be monitored. Where's the funding going to come to? That's another little page into what Greg has to put together. I know I could go on and on, but I think I'll cut off at that.

There's so many problems that's out there. One that is a stigma and they go to it and it gets kind of drives into me, but the element of bocaccio. In my 50 plus years of being in the Seattle area waterfront, being the son of a boathouse operator in the '50s in Ballard, I've never seen a bocaccio. I talked here just a couple of weeks ago to a couple of checkers for the state that have been on the docks counting fish for the last 15 or 20 years, and it's been 6, 8, 10 years since they even heard of a bocaccio. Yet, we're intending to bring them back when they virtually are non-existent? I don't know. Yet, it's a wish list, but I think that we can almost say that we have to scratch them. I don't want to admit it, but I think that's where we are at. Off shore, that's a little bit different thing. Yet up in Alaska this summer at Langara we brought one to shore, the fellow who took care of the fish looked at the bocaccio, it's a junk fish. Do we want to spend our efforts to that something that is considered to be unusable? Okay, I'll get off. Thank you.

Wayne Palsson: Mike Royer

Speaker: First off I want to commend our two biologists. I think they have really worked hard on a plan, but the plan's got a lot of flaws. I would like to have it opened up after all the facts have been presented accurately and the advisory boards have got together and have it reopened to the public for more comment before it is implemented.

Greg Bargmann: Please state your name.

Mike Royer: Mike Royer. And that's all I've got to say. I think there just needs to be further study on what's going on. Thank you.

Wayne Palsson: Nick Gayeski.

Nick Gayeski: Thanks for taking my comments. I'm Nick Gayeski. I'm with the Wildfish Conservancy. I'll be making written comments on the plan, so I just want to focus on a couple of things.

I think the plan does a really good job of presenting in broad outlines how severe the crisis in depletion of the rockfish complex is, what their age structure is. I'd just like to highlight that this severe decline, the magnitude of which I don't think we truly know because what the pristine biomass might have been, we know what it relatively speaking was in the '70s sometime, maybe the early '80s. We certainly know that we've simplified the age structure, and some of the consequences of that are increased recruitment failure on top an already natural highly variable recruitment function for a rockfish. Climate change will only make that worse. The younger the age structure of the spawners which is what we have now the poorer the recruitment. There's real good data on that, and the more variable recruitment success is the progeny of young spawners is (?), so you really need is a long, three decades or longer, rebuilding period in which the aim is as rightly pointed out by the plan to rebuild the age structure along with the numbers in the biomass.

I do have a concern about the artificial production and that way it's referenced in the, listed in the draft EIS. There's, to my knowledge, practically no evidence, and certainly little, of any experience in artificial production of a viviferous commercial fish for rebuilding much less augmentation. There are several analyses that have been done. Salinas Heffles of Oregon State University recently comes to mind, that raises questions both compared with Marine Protected Areas and otherwise getting off the harvest mortality on these critters. But I do think that there may be one possible use if this is what you're thinking in the EIS it should be clearly stated, there's probably some evidence that there's defensation in some of these stocks which would be of a low enough abundance as to warrant them for endangered listing under the ESA as a side note, but if a particular stock is identified as being on the brink due to defensation, it might be reasonable then to consider an emergency artificial production intervention. That might be, seems to be warranted. We should talk with the NOAA folks at Manchester and elsewhere about that. But I think that, that's a very delimited use of artificial production, it should be flagged as such, and in general, protecting the natural habitat and providing the opportunity for these fish to grow and rebuild is much more cost effective and proven likely to succeed than unknown artificial production. Thanks a lot.

Wayne Palsson: Thank you. Micah Wait.

Micah Wait: Yes, thank you. My name is Micah Waite. I'm an ecologist with the Wildfish Conservancy, and I mostly want to address the ecosystem function and inter-connection policies. And the preferred alternative was no action and I think that in terms of looking from the top down within the ecosystem predator control, I think that's great. Seal levels are at carrying capacities, someone mentioned earlier; carrying capacity is 7,000 is what it was set at and now it's at 14,000. Well, that's actually impossible. Carrying capacity is not a manmade number, carrying capacity is an ecological number based upon habitat availability and prey availability. Rockfish populations were at their historic abundances when seals were at their carrying capacity, historically, and I don't think that trying to control predators is necessarily the right step, so I applaud the Department for not going there. But, on the other end, from the prey for

rockfish I do think that steps could be taken within this plan such as limiting the commercial herring fishery, and as far as prey for juvenile rockfish goes I do think that a lot steps that are being taken for the recovery of salmon in terms of restoration of nearshore ecosystems and mud flats and those sorts of habitats would also benefit rockfish, and I think that it's important for the plan to look at that and perhaps increase the amount of work that is going into that. I also strongly support the use of Marine Protected Areas in terms of rockfish recovery. Thank you.

Wayne Palsson: James Fletcher.

James Fletcher: Actually most of my points were expressed, so I'll pass.

Wayne Palsson: Thank you. Kelly Britz?

Kelly Britz: I already submitted my comments. I'll pass.

Wayne Palsson: Mr. Ron Garner.

Ron Garner: I'm here on behalf of Puget Sound Anglers. We're the largest, we have 18 chapters in Puget Sound, and I'm president of the Sno-King Chapter which has 800 members, and we do a lot of fishing, we do a lot of data, we do a lot of conversing, and I don't think the rockfish fishery on the recreational side is that big of a thing anymore, not the way it's been in the past. People in our club, there's hardly anybody that even does it anymore. Myself, I head for the ocean for lingcod, rock cod. I don't catch them in here anymore but I do a lot of deep water fishing, and I do have to agree with Tom Pollock, I don't think that bocaccio have ever been a prevalent fish here. I don't think the yelloweye or canary have ever had really big populations in here either. When we catch those in the ocean a lot times, it's way deeper than anybody else in here fishes. A lot of times they are in shallower water but you can catch them (?) 700 plus feet, which we do.

You were talking about venting fish? There's a tool out called a Shelton SFD. Have you ever seen that? I've used that and it's a pretty good tool. Big rockfish, big yelloweye. We caught one several years ago out in the ocean, you know, and if you put it down pretty fast, you have to get it down 30, 40 feet and that fish starts reviving and swimming, boom! It takes off on its own. It's real important to get it down there real quick, you don't have to poke a hole in its swim bladder. And, I imagine most people with a needle laying in their tackle box never gets cleaned.

As far as things such as MPAs, I think we're pretty vague on that, and I would like to see that this does not get tied down until there is a lot more proper data and it gets revisited within several years; probably within one to two years.

There is more data that's missing out there that needs to be gone over before we go to anything like that, before that's even considered. We need milestones that need to be set, and I think I saw it up there too, that you could actually get back up and maybe reopen these areas when they come due. The one-twenty foot line, I understand what that's for because I sit in the halibut/bottomfish meetings out for the coast, and I'm probably one of the only recreational fishermen there other than the charter guys, and that is to save rockfish, but when you start

pushing people into those shallower waters like that, if you take that on as a one-twenty foot line, you start wiping out a lot of fish. And, there are a lot of rockfish in shallow water and I think most people do fish there. And, I think that would be putting a lot of people on that do fish for them into areas that they probably shouldn't be. I really think that should be in the rockfish plan and not in the proposals. I think that should be moved over.

Something needs to be set in place and pressure to get the tribal draggers, the few that are still out there, they need to be gone. We can't have a plan to rebuild things, and turn around and do it again. Seals are a problem, and I realize my time's up, but it needs to be, anything that we do, it needs to be across all user groups. The gill nets, having the gill nets coming out are supposedly going to save 61,000 rockfish a year. I think that's a great thing and I hope that continues. I'd like to see, like Tom said, tag the nets so they can be tracked back and make sure that those things if they go down they come back out. I think that's all I got. Thank you.

Wayne Palsson: Mr. Ken Kumasawa.

Ken Kumasawa: My name is Ken Kumasawa. I'm a recreational fisherman, member of PSA, CCA, and a sport fishing advisory group member. I agree with most of the comments that were made today.

A comment I'd like to make is that in terms of some of the issues particularly like tribal and others, what is going to have to happen is that the Washington Department is going to have to discuss with NOAA, with the federal Fish and Wildlife group, the Department of Congress, and maybe even President Obama to have a consultation or some discussion with the tribes, not about ceremony, not about tradition, not about commercial and sustainability, but about the way they fish. And, it's not only for rockfish, but it is also for salmon and other anadromous fish. Every state agen, every federal agency has a Letter of Memorandum which says, kind of goes soft on tribal discussions, but when it comes to putting out comments, they put it down to the recreational fishermen because we are the ones that they have direct access and control.

The other is economics. The economic ramifications of some of these rules and regulations really impact more than just individual people and commercial fishermen. It impacts the whole state's economy and Phil Anderson laid it right out. They've budget cuts that are going to have to come to the Department. And, to curtail and to restrict some of the fishing opportunities and activities will affect the budget of the state.

And lastly, there are last comments for the regulation changes. I request that the rockfish group look over the rules and regulations that are proposed that will go to the Commission for approval in February and ask that certain portions of those rules and regulations be removed and be put under advisement of the Rockfish Management Plan, particularly the MPA recommendation for the Neah Bay area and other regulations such as the depth fishing and other comments, even the divers. Now I'm not against divers. It's just that I am concerned about how they are going to ask the rockfish to hold still while they measure them for stock length. Thank you.

Wayne Palsson: Mr. Robbie Tobeck.

Robbie Tobeck: First off, I would like to thank you guys for extending the comment period and having some additional meetings. I was at the first meeting in Mill Creek that was quite a few weeks ago. I am little curious about the response time from the Department. I still have not heard back from the comments made at that meeting and I don't know if I was supposed to have by now or if we are going to hear back after the final plan is in place?

Greg Bargmann: We are not responding to the comments until after the end of the comment period which will be about a month from now, and then we'll try to (the rest of these comments inaudible).

Robbie Tobeck: Okay. Thank you.

Wayne Palsson: It is safe to say that we respond to the request to extend the comment time period as well as additional meetings and as well as preparing an ad hoc citizen committee, an advisory committee, so those hot issues we did respond to immediately.

Robbie Tobeck: And, once again, I thank you guys for that just like I opened my comments up with.

The derelict gear, what Tom Pollock said, I would also propose that instead of completely shutting down a rockfish fishery retention, I understand there's an issue with the salmon fishermen having a bad day. Salmon fishermen going and targeting rockfish, and I understand the Department's position on that, but it seems to me that during a lingcod season is when we had the most interactions with rockfish, and if they do have a problem getting down, which we know they do sometimes, I would propose that we're allowed to retain rockfish during the lingcod season. That is a short, six week season as it is.

I would also propose, I don't need to make any more comments than have been made on the bocaccio other than just propose that it is taken off the key species list if we manage these rockfish based on the key species you guys have listed in your plan. I would, once again, I would propose those bocaccio be taken off of that.

I would also, I'm curious as to how the 120-foot depth restriction that's in the rules proposal right now will affect MPAs and stuff. I fear that, my one issue with MPAs in Puget Sound would be that, once again, the marine mammals they would be a smorgasbord for marine mammals if they are not placed deep enough. So I am just curious how you're going to play those two issues together, the depth restrictions with MPAs.

And, also, if you're going to have rockfish recovery areas, I would also propose that those be closed not only to bottomfishing but also to diving. Diving cannot be monitored, and I've talked to a few divers – rocks get moved, habitat gets changed, fish get disturbed by recreational divers. That's all I have.

Wayne Palsson: Thank you. Okay, so those are all the folks that indicated that they wanted to respond. We still have more time here if anyone else would like to make a comment, you have some opportunity now. Okay.

Gene Coronetz: My name is Gene Coronetz. I'm a long-time SCUBA diver here in Puget Sound, and here speaking on behalf of myself and my marker buoy dive club which while it hasn't sent me here tonight, there are many people in the club that would like to have been here that I'll speak for.

I heard a few comments about SCUBA diving and recreational divers being disruptive to marine environment. I take exception to that. Our club is indicative of the general diving population here in Puget Sound, and I can't think of another group that is more ecology-minded and more concerned about preserving the habitat. Even those of us that hunt do so in a way that we are disciplined and self-limiting, as we've seen in the '70s and '80s the bottomfish population declining. We voluntarily cut back our take and even stopped harvesting in certain areas to be sure that we wouldn't quickly deplete the populations on those particular reefs. And, I have to say that since about the year 2000, I have personally observed many, many reef areas up and down Puget Sound where the fish stocks, the rockfish, bottomfish stocks, while they are not as large as what I recall seeing when I first started diving here in the '60s, they are coming back in very strong numbers with very big populations of juvenile rockfish, and the numbers, to me, are very encouraging. Now I don't have a scientific basis for that. It's just my personal observation and very carefully kept dive logs for the last four years which indicate that this reef which I have visited, you know, a hundred times before, now I've seen 300 black rockfish on a single dive rather than 10. And, this is a pattern that my colleagues in the club and I generally have observed. So I am hoping that in the implementation of the EIS, some consideration is given to this observation that we're actually on the upswing rather than on the decline in accounting for the number of fish that are out there. That's all I have to say.

Wayne Palsson: Sir. What's your name?

Ken Pinnell: My name is Ken Pinnell. First of all I want to say thank you very much for opening it up for all of us to come in and make our comments. I am a member of PSA. I am a member of the ASA, American Sportfishing Association, and I am a member of CCA as well. I also represent tackle manufacturers in Washington State and major changes would have major implications in my livelihood as well as many, many, many others within Washington State, so as we go forward with the regulations I feel we need to be very careful how we go forward with them, how we approach everything.

I would agree that the ghost nets removal is critically important, but I agree completely with Tom that they need to be marked. Going forward I understand that there's the issue with the tribes, and that that would have to come down from a federal level, but we need to try to figure out how we can make that happen.

Looking at use of gear restrictions, not necessarily depth restriction and some things, but maybe some different gear that was mentioned. I think that is a great opportunity for us to be able to continue with our fishing for other species while lessening the impact on the fish.

Again, small business impact, and then also, as Rob Tobeck had mentioned, fishing in the shorter seasons. I've been out there fishing hundreds of hours a year in Puget Sound for many, many

years now. I don't go specifically for rockfish. It's not something I'm targeting. I do know there are people out there that do that. I think a shorter season will have a lesser impact on them. That's all I have for this evening. Thank you.

Wayne Palsson: You say you're name is Ken Pinnell?

Ken Pinnell: Yes, and I did sign in earlier.

Wayne Palsson: Anybody else want to comment?

Karlista Rickerson: I'm Karlista Rickerson and I live on Maury Island, which is part of the Marine Preserve. I'm also an avid SCUBA diver.

I feel like I'm definitely in the minority. I've been diving for 28, going on 29 years. I have watched two sites go from being able to see juvenile rock cod, Cabazon, lingcod, greenlings guarding their eggs. It happens to be at the end of a fishing pier. I dove there Saturday, I saw not one greenling, greenling. The greenlings are gone. I saw a big nose Skate come through, and all I prayed was that that fisherman on the end of the dock didn't wipe him out. That is only the second one I have seen there in 29 years. I have another site that I dive on the outside of Maury Island. Well, there's two places, and because it has an old barge anchor from when they used to haul gravel from out of there. That's the only reason there are any fish for anybody to look at because they use that vertical structure as their resting place, as their congregating place. The little juvenile rockfish just hang out there by the dozen. We come up from the side a fisherman comes through and he snags one. He puts an X on the side of his boat and makes a big loop and comes right back again.

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Lingcod season, they're wiped out. In order to protect and restore Puget Sound, they came in and took a dock out with four sets of dolphins. Those little rockfish used those dolphins for hiding places. I dove there recently. There's nothing left. They had to go somewhere. Now if we could get vertical structure back in there, then we could recreate what man made probably 90 years ago when that dock was first put there. But, we've got to get something going. If we keep putting it off, if we keep studying something, it will be another 10 years before anything gets done.

Thank you very much for having me, I wasn't going to say anything, but I'm a viewer and I applaud the Marine Protected Areas, and even in an area, the Saltwater State Park is an old fishing reef that Washington SCUBA Alliance started working on 15 years ago, and they finally got, with the help of everybody, got it reestablished and it will be monitored. The fact that we can use citizens-based monitoring, we have SCUBA divers all over Puget Sound, all over the Sound that are willing to get in there and do that monitoring. So, thank you.

Oh, by the way, in 29 years of diving, I have never seen a black rockfish. Last May, I went down to the site and there were two.

Wayne Palsson: Okay. Anybody else?

Jo Wadsworth: So, thank you all for coming and for providing us your thoughts and your comments related to the Puget Sound Rockfish Plan. I think, and thanks again to the Seattle Aquarium for providing us this wonderful venue for having a public meeting, and have a safe trip home.

Bremerton Rockfish Conservation Meeting

Greg Bargmann: …so, what I would like to do now is to move to the formal public comment period. This is a stage where we will ask you to come forward, stand up here, this is being recorded, and to make a statement. We would like it to be brief. I'm guessing we have a number of people who want to make their statements. If you signed up on one of those long sheets here, that would be great. And, we will take, I think Wayne, we'll just start with the people there, get those people who have signed up and communicated that wanted to and at the first opportunity if we have time, then we'll open it to people who have not signed up and changed their mind and want to do it. If you come up here, I'd like you to state your name clearly and if you are speaking on behalf of any organization. If you signed up on a sheet, that is all we need you to do. If you have not signed up on a sheet, we would like you to state some way we can contact you like an email, a phone, an address, or something. Anything you say here will be part of the formal record of decision that we're making. It is not likely that your particular comment will be put in anything, but will be lumped with other similar kind of comments. As I said at the start, we are required by state law to respond to each and every comment that people make about when rockfish are caught, where, and look at our estimates. We will do that when this whole process is over which now will be in early January so I imagine in January sometime, you'll be hearing more from us. With that, I'd like to turn it over and ask Wayne to…

Wayne Palsson: Okay, so we have ten or so folks that have signed up so three minutes each, that's thirty minutes right there. I'm going to press my timer to go beep if you can kind of wrap your comments up within 30 seconds, a minute, or so. You'll probably hear a lot of similar comments, you might just say "I echo that person's comment," or " I agree with this comment here or there," but this is what I'm more particularly focused on, that's often a good way to give comments at these meetings. The first one is Mr. Howard Kauffman.

Howard Kauffman: I already answered my question.

Wayne Palsson: Okay. Next one is Laurence Bucklin.

Laurence Bucklin: My name is Laurence Bucklin and I did speak in Olympia and raised some questions that I have spoken about here as to the specific information on pinniped predation; total amount that they are eating, they are growing. What this plan says is that their growth rate is slowing. The growth is still going up, we're now at about 15,000 according to the last Washington Department of Fish and Wildlife report. I guess we're going to see those numbers looked at and if necessary, corrected after all of the public hearings, and I think that's good.

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I'm also looking for more specificity on the 35,000 encounters annually and the 13,000 catch-and-keep out of that. As to where they are located in Puget Sound, it's a very diverse area, different habitats and these different species that are in trouble are going to have to be managed in their locations. So that may impact all this, so I am looking for more information on that.

Finally, and more importantly, and I know these fellows put a lot of work into this plan, so don't take this personally, but this is a good guide. In my mind it's not a plan, it lacks specificity and according to the report tonight, it was done purposefully. It's hard to have a plan without

specificity and I think that's what many of us are concerned about. Since the initiation of this process, Fish and Wildlife has listened to suggestions for collaborating effort and they brought on an effort, they have an advisory, rockfish advisory board to help with this plan. My recommendation is that they complete this round, take the information, and stand up the advisory group, turn this plan in its un-formalized format and let the advisory board and staff work out a new draft plan with specificity and then put that out for public review and comment, and then a final plan come from that effort. I believe that is what I recommended the last time and based upon (?) input, I'm even stronger believing in that course of action. Thank you for this opportunity.

Wayne Palsson: Thank you sir. Next one is Charles Gauthier.

Charles Gauthier: I'm Chuck Gauthier with the Kitsap Chapter of CCA. Quite a few of my questions have been answered, but there was one thing I noticed. I never heard a word about the Northwest Straits Commission and the deal tonight and the ghost net removal program. That's $4.5 million that's dedicated to the removal of ghost nets and that wasn't mentioned at all so I just wondered if you are considering them. I think that's it. I would go along with the last speaker as to getting the rockfish group stood up and consult with them and make it more than just you folks that we get involved as a group. Thank you.

Wayne Palsson: Thank you sir. Lee Kriley, Lee K. Riley.

Lee K. Riley: I'll write mine.

Wayne Palsson: Mr. Jerome Mears?

Jerome Mears: I'm going to go ahead and write it in.

Wayne Palsson: Thank you sir. Mr. Rick Kremer?

Rick Kremer: I'm Rick Kremer. Like I said before, I like to fish the area between one island and Tatoosh Island in the kelp beds, probably 30-, 35-foot of water max. I catch almost exclusively, black and blue sea bass. Sometimes I catch a couple of lingcod, but I haven't caught any of the six species you mentioned as being the ones you're trying to protect. I've released several of the sea bass along the way, and due to the depth of the water I haven't seen any of them that have had any problems recuperating and going back down to the bottom. So, I am wondering why you want to close that area specifically.

Wayne Palsson: Natalie Seiter?

Natalie Seitz: That's Seitz. I'm Natalie Seitz. My comments are to do with the draft EIS, not so much the plan itself because people have commented that the plan lacks specificity and I feel the same way about the EIS. It doesn't discuss current planning efforts and how they're implemented. It discusses a lot about a kind of a baseline biology of these fish, but it doesn't discuss, it's clear that certain areas are already closed and it's clear that certain minimum catches are already in place, but the plan doesn't talk about those previous planning efforts as a baseline

and then discuss how this new plan is going to either increase or decrease those types of protections. It kind of, it's very difficult to ascertain that from the DEIS as it is right now, for me at least. I also felt that socio-economic impacts weren't really addressed very well, if at all, in the DEIS that, you know, even if it isn't a commercial fishery people do do it for recreation spend money and time doing that and if you have certain restrictions you will have secondary socio-economic impacts if you close certain areas or restrict certain kinds of fishing equipment. It seems to me that there would be some secondary impacts there. And I think that's (?).

Wayne Palsson: Mr. Norman Reinhardt.

Norman Reinhardt: My name is Norman Reinhardt. I'm the vice president of the Kitsap Poggie Club. I'm here asking the question that's already been asked several times; specificity. The default of protecting these rockfish are fine. I'm not sure that Marine Protected Areas is the correct way of doing it at this time. Perhaps, sometime in the future they can be looked at. I base that on the fact that 1) the question of ghost netting - how does that impact rock cod numbers in the Sound? We won't know that until they're removed. To put an MPA in place before that happens, I don't see how you can have a scientific basis when you are looking at two different parameters to measure something from.

The other is gear restriction. It's fine that we have gear restrictions on our commercial fleet, I'm wondering if the people that developed the plan have looked at gear restrictions for the sportsmen's fleet. Specifically, I'm talking about bait versus artificials. One of the things I've never been asked by anyone that has surveyed me when I've been salmon fishing is, "What kind of bait did you use Mr. Rinehardt?" I've been asked, "Did you catch any rock cod?" In the course of, I don't know how many years I've been salmon fishing in the Puget Sound, I have caught exactly one rock cod that was caught in Area 12 just south of Antioch Point during an anoxic period when the fish have come up there in the top fifty feet. The air bladder was not exploded. I was able to successfully release that fish. But, again, I have not seen where gear restrictions for sport fishermen have been discussed in lieu of closing entire areas to any type of fishing under the MPA umbrella.

That's the other question that I haven't actually heard or been defined and that is, how does the Department define an MPA? Is there a limited scope, or is it limited in scope, or is it broad in scope? If we develop MPAs for rock fishing does that mean that the area is closed for all fishing or just methods of fishing that will impact or have an encounter with rock cod? Thank you very much.

Wayne Palsson: Thank you sir. Mr. Anthony Schwab.

Anthony Schwab: Hi, you know me as Tony Schwab. I'm a commander of the Bremerton Pilot Squadron, life member of the Puget Sound Anglers, and I'm an officer of the Kitsap CCA. However, I am not authorized to make a statement for any group. This is coming from me, but I've spoke with lots of the fishermen and most people agree with my ideas, and I reiterate that what the other guy was saying about specifications about what you guys plan to do. I don't have a whole lot of comment on it, however, I would wish that the board and their thinking of how things are done in the future, our depletion of rockfish in the Puget Sound, which by most

boater's definition is in the Port Townsend area south as far as Puget Sound, so when I represent Puget Sound, that's the waters I'm talking about. The area is wiped out. When our fine Governor, Dan Evans, opened it up to come in and clean it out. I was born and raised here and there was always good fishing until that happened. It's been wiped out by commercial fishermen. It's the commercial fishing derelict nets that are causing just tremendous havoc in that ecosystem and you know working on it getting these derelict nets removed. And, it's also my opinion that the commercials did cause this problem and I think they…the Puget Sound is too small, we've got too many people that want to recreate on it, in my opinion the whole Puget Sound area including Hood Canal should be shut down to any kind of commercial harvest period. There's too many people living here depending on it for recreation. There's the whole ocean out there to go [commercial] fish in. And, that's my comment.

Wayne Palsson: Thank you sir. Mr. Randy Jones.

Randy Jones: Thank you, good presentation. My name's Randy Jones, with Adventure Charters. I've been a charter skipper in Kitsap County for twelve years and I run two boats. I also do dive charters and I know something about shipwrecks and customers that have gone up into British Columbia and seen the shipwrecks up there, and it's an incredible opportunity for tourism. There are plenty of areas and I wanted to reiterate what was said earlier so it's on the record in the Straits of Juan de Fuca on the south side from Freshwater Bay to Port Townsend that are derelict flat, flat lands with no rocks and anybody that's over seventy years old there knows it. Forty years ago if you dropped a refrigerator in you'll have a refrigerator full of bass and rockfish. So that's one answer to the problem. I also happen to use artificial lures along with bait and if you're not fishing in a locked rock pile, you don't catch that many bass or that many rockfish. So, I wanted to put that out there, but any case, the responder is that there are shipwrecks that are thirty years old now and should be (?) for the open waters of Puget Sound, in the direct Puget Sound, should be brought into the inlets and the Strait of Juan de Fuca for artificial reefs. So that's my comment. Thank you.

Wayne Palsson: Thank you sir. Well that covers the folks that indicated directly, wait one moment?

Male voice: Yeah, can you go on record? I just have a clarification of something that's a question and answer.

Wayne Palsson: Let me just make a statement here first, and then we'll get to you if we have time. Let me finish here. So everybody, I think I addressed everybody who indicated yes that they want to comment. If there is anybody who wishes to comment at this time? You can do that, so if anybody changed their mind, that's cool. Just let us know your name, you sir? And while he's coming up here, maybe you can ask your question?

Male voice: The discussion about closing the area around Cape Flattery. The plan talks about north Puget Sound starting at Sekiu River and running east. That is what the Puget Sound is defined as for the purposes of this plan. Is that not correct?

Wayne Palsson: That's not correct.

Greg Bargmann: The rockfish plan…
Wayne Palsson: That's right. That's right.
Male voice: I just wanted to make sure that everybody understood that it's the Sekiu River east that the proposed changes west of the Sekiu River are proposed rule changes for 2012 rules and we need to have comments on those by tomorrow. Is that not correct?
Greg Bargmann: Midnight tonight.
Male voice: Midnight tonight. Midnight tonight?
Greg Bargmann: That's a separate process.
Male voice: Right. I understand that.
Greg Bargmann: (…regardless of)
Male voice: I agree. The discussion was about that and it was being brought in for folks who misunderstand that this was part of the plan, when in fact it is the Sekiu River east that constitutes the Puget Sound.
Wayne Palsson: So we should tell the person that made that comment, that if you want to make a comment about that closure, I believe you can still email to the agency and provide your comment regarding that closure proposal. (Some mixed conversation).
A different male voice: It says December 1, you have until December 1.
Wayne Palsson: Well, that would be tomorrow.
First male voice: Thank you. That was it.

Wayne Palsson: Yes sir. What's your name please?

Fred Perkins: My name is Fred Perkins. I represent my 14-year-old son, Freddie, and my 12-year-old son, Scotty. We don't have a big boat. We have a 19-foot open bob Bayliner, and what I'm getting out of all this is our recreational fishing will be gone for maybe ten years. That's a big concern. I mean most of the people that are here are not quite that young and who's going to teach these next young kids how to fish? I mean, that needs to be a concern about the two conservatives shutting everything off. I certainly, one of the first comments everybody's saying about specificity (trouble pronouncing), anyway, be very clear about what areas and what you're going to do. It needs to be stated, and this board that's going to be assembled doesn't appear it's going to have a lot of time to gather that data because this all going to be implemented in 2010. That's not a lot of time, so that stuff needs to happen and happen quickly to give them a chance to make an impact. Thanks.

Wayne Palsson: Thank you sir. Anybody else? Okay, with that we'll end the public comment, the oral comment. Did everyone get one of these sheets here? These are the addresses to submit either by email or direct mail your comments. This is a test: when will the comment period end? This is a test. Nope. January 4.

Port Angeles Rockfish Comments

April 7, 2010

Wayne Palsson: Michael Jones.

Michael Jones: I was wondering if you are going to ever do anything about, you've talked about, the seals and sea lions on these bottomfish and that. Like 30 years ago when we had lots of bottomfish we didn't have this mammals act. Now anytime we go out there we've got seals and sea lions stealing our salmon and halibut right off our gear. Well, they got to be eating something and you know, there uh, there's hundreds of them hundreds of them in the harbor now. There's no bass in the harbor like there was when I was a kid. They've got to be eating something. And then, I was also wondering if this thing goes for halibut in a few years if you guys are thinking about restricting our salmon fishing too with the depth.

Wayne Palsson: Okay, we are not going to give answers here. This is testimony. I might suggest you be more affirmative, and state things the way you would like to see them. That might be one way…

Michael Jones: I would. Okay, I'd like to see some more, like down on the Columbia River where they are doing something with the endangered salmon, getting rid of some of the sea lions and (?) and stuff. I'd like to see some of that up here in the Straits of Juan de Fuca. And, I guess that is about all I have to say. Thank you.

Wayne Palsson: Thank you. Okay. Could we use the microphone too? The next one is McDonald, Tina or Tim. What's your name sir? Response: Tim.

Tim McDonald: Okay, I think you guys need to do something different on your counting where you're coming up with your figures, there's a whole bunch of fictitious numbers that aren't in our favor. We need to have a better accounting other than all these numbers you are grabbing out of the air. Also, we need to have a better understanding with the Indian tribes, that they kind of adhere to some of the same stuff that we are getting shoved down our throat. Now you guys haven't addressed anything about what you are going to do after you implement this 120' restriction that you are going to put on us…what it is going to entail for our halibut fishing and what it is going to entail for our salmon fishing. And, you are not addressing how long this is going to be for. So, we need to have some answers other than just coming along and saying this is going to be a fine idea and we're going to stuff it down your throat whether you like it or not. Thank you.

Wayne Palsson: Norm Metzler. Daryl Knauff. Lyle Newell. Cliff Echterkamp. Ward Norton.

Ward Norton: One of the things I've noticed in your plan is that I don't see you being very proactive as far as improving recruitment of the juvenile rockfish into the spawning population over a period of years, especially the deep water rockfish. And, what I would like to note and suggest is that the salinity barriers have been created two unique opportunities for your agency to improve recruitment of these rockfish that is denied the federal government that my sources at the Oregon Department of Fish and Wildlife and the Hatfield Research Center would love to in the coastal waters, and that would be to limit the, at least make a dent, in the major predator that

eats the young of the deep water rockfish until they get to be about a foot or two long, and that is the lingcod. One of the things that I would suggest to be considered would be inside of Puget Sound and also Hood Canal would be a lingcod season, a movement of the lingcod season to the first of February and lasting through April because that is when the larger lingcod are generally in shallower water because right now with the 120' limit, you won't be seeing many of the larger lings. My suspicion would be that would improve recruitment maybe 15 maybe 20% which I think is significant over the long term. In Puget Sound I think this would be popular but I've done a little checking in the last few days and in Hood Canal you will get some resistance to this because I talked to one of the diving concession operators in there and asked them about how they felt about it and they admitted that the numbers of large 30+ pounds of lings in Hood Canal is just tremendous. But, they also said that they didn't want sport fishing going on in their canal. And, this, uh this, the healthy area apparently is north of Eldon. South of Eldon you have the popularized problems but north of Eldon, I've talked to people within your agency and they have said that things are in pretty good shape in the areas where there is lots of movement. Anyway, limiting or at least going after the larger lingcod should improve recruitment of the population and that would be a good thing.

Wayne Palsson: Thank you. Doug Meyers.

Doug Meyers: Hi, I'm Doug Meyers, Director of Science of People for Puget Sound, a non-profit organization, represents about 5000 member households and that would include recreational divers, recreational fishermen, people who are generally environmentally concerned about Puget Sound's health and the ecosystem integrity. Also, I'm a member of the citizen's advisory committee that met with the Department over the course of about six weeks, and I wanted to commend the Department for first taking the step of creating that citizen's advisory committee because I thought it was very critical and resulted in some varied market improvements to the management plan from the first version. And I wanted to acknowledge the difficulty everybody has in accepting additional restrictions on recreational fishing and I think it's just reflective of generally consistent decline. I think the plan is wise to not focus specifically on the recreational fishing aspect, but does have plans for how to deal with pollution and the derelict gear and we left everything on the table even though there was not a clear consensus on the exact amount of what to do. I think it is crucial that we move quickly toward developing a system of marine reserves and rockfish conservation areas that are large enough and close enough together to be able to create a genetic diversity of recovering species while still allowing appropriate fisheries to take place for those species which can handle it. Thanks.

Wayne Palsson: John Albiso. Russ Mellon.

Russ Mellon: Russ Mellon, 512 Clark Rd, Sequim. First of all it seems like a burden of protection for any endangered species, rockfish, salmon has fallen only on the shoulders of the recreational fisherman and whatever action is taken regarding rockfish needs to apply equitably to all fisher people; commercial, tribal, and recreational. And, of course, I guess we're past dragging, but absolutely no dragging, and telephone surveys as you can tell we had 33 people here in the room tonight and one person raised their hand indicating that they'd had a telephone survey in the last two years. I don't think the telephone survey method is effective for identifying any catch history, and I don't think it should be allowed and continued. I believe that

catch record cards for any species that you are trying to track should be the predominate method and that can be done electronically the day after a season closes so that that data is fresh and accurate. As far as protecting, I would recommend that we protect the endangered rockfish, the deepwater rockfish, by identifying the areas that can be geographically identified spot areas or whatever you want to call them protection areas so that those areas aren't fished by anybody deep water, and then, halibut fishermen and salmon fishermen would be allowed to fish at any depth during those seasons outside of those protected areas. That way you can save those, enough of the species that are deep water, to grow for a hundred years or what have you to provide the sufficient number to the fish that you are looking for. So that would be pretty much it, that we can get through protecting the species if we're creative and work together on it.

Wayne Palsson: Thank you, sir. David Drewery. Dale Lane. Dick Gorn. Bruce Gagnon.

Bruce Gagnon: My name is Bruce Gagnon. I am a life-long resident of the Olympia Peninsula. I grew up here all my life, and grew up most of my younger years out in the west end Sekiu/Clallam Bay area. I wanted to comment on a few things, first of all the catch record that the data you guys are using I think is very flawed and what I'd like to see is more accurate data instead of just an educated guess because you can see it's very flawed by the reaction you got here from the show of hands on the telephone survey. It would be very easy to implement a catch record for rockfish. It is not going to make it that much more difficult, we already got one, it's just another page just added on. I think that will vastly improve the science that you are trying to deal with and make it more accurate science instead of just an educated guess. I wanted to focus most of my comments on the Strait of Juan de Fuca area and primarily the area west of Port Angeles. It appears that in your presentation here…that it showed that…oh and I want to primarily comment on black rockfish. In your presentation it showed that those stocks were healthy. Okay. And, I really have a problem with the way that it has been designed to just continue to limit the amount of rockfish that we can take especially the black bass when I know the stocks are healthy. I fished that area all my life. One gentleman gave the comment about all the fish that are out there, and sir, I could take you out there any day and I could show you those spots where there's plenty of those. I'd like to say, I've lived there, I know where those fish hang out, and there is no shortage. I can put my line in and almost every time have a rockfi…uh, bass on it. Okay, so it's not a matter of not being there. So, I question, why is that when we have healthy stocks particularly around the freshwater bay area around Pillar Point to Slip Point, around the caves area, the Sekiu River when those are probably the more popular spots to fish, why can we only fish one fish at Slip Point, three fish at um, well I guess it's going to go to one fish all the way out to Neah Bay this year, and I think that they're talking about dropping it to five in Neah Bay. Is that correct? [Six.] Six. Anyway, they're going to drop it a Neah Bay, too. My question is why is Neah Bay different than those other areas when they have healthy stocks? And, I would like to see that discrepancy evened out so that we as recreational fishermen have a chance to target those healthy stocks. I know that your science is wrong in those areas. Other area I'd like to comment on is the halibut fishery. Initially it appears that you're trying to target some of the deep water species of the rockfish for the halibut fishermen, and I don't know about you guys, but when I fish halibut, I don't catch those species. Okay? And, I'd like to see a show of hands here of how many halibut fishermen are here. And, how many of you halibut fishermen have caught rockfish when you are halibut fishing? And, this is just another example, sir, of the science being wrong, and, you know, if you're going to want to target and limit us, just tell us,

don't try to use false pretenses for getting us to not fish. I'd like to make one other comment, and that is the other things that, you know besides us as recreational fishermen, the Scuba divers, the marine animals, the tribes, and everything, I mean we all have a part in all this, okay? What I would like to see, I would like to see because we're leaving one species out of this and that's the marine animals, and since the '70s when the marine animal's protection act was put into place, we see nothing but an abundance of those creatures running around and marauding the fish. I would like to see the Commission start to work with the tribes because they have, most of the tribes around here have the legal right to go and harvest those seals and sea lions, and to take and try to work with them on some type of a marine management that they can maybe use that as a resource, you know in other areas as in Alaska and so forth, they use the hides and so forth, try to work with that so that they can help control those populations a little bit instead of just forgetting about that specific avenue. Okay? Thank you very much.

Wayne Palsson: Mark Dowlar? [Mark Dawber]

Mark Dawber: Well most of what I'd say I think has already has been said, and I'd second about 80% of what I've heard here, just for another vote. The other thing I would say is there is a very interesting thing going on here statistically. It seems as though the fish data is being derived to a great extent by, in one form or another, the investigating recreational catches: the cards, the phone calls, whatever. However, you have to have a statistical way of getting a compensation for the catch restrictions, so at this point what's going on is that it is actually the restriction of catches is going to make it very, even more difficult than it already is. Don't blame anybody for not knowing what's under the ocean, these numbers it's impossible to begin with. It's being made worse. Really, you have to go to some other means, use some other means of getting the data when you start to protect that other compound in it.

Wayne Palsson: Thank you. Donald Hatler. David Caldwell.

David Caldwell: Yeah, I was wondering for Puget Sound north, is the population different from San Juans like Area 4, 5, 6, is the population of rockfish different in those, than rather the San Juans and could we, could it be separated area 4, 5, 6 have that Strait of Juan de Fuca and then the San Juan Islands, have that as the north Puget Sound? And, cause I, I figured with down like halibut fishing I mean three years ago I got hurt, the first two years that I was off I did not get to do much fishing. Last year they just said exercise, get healed up, so I got to do fish probably three-quarters of halibut fishing, and I mean we're out there three quarters of the season here, up in Sekiu fishing and the only time that we caught rockfish is when we'd reel up the halibut poles, pull into shore, cast out, catch some rockfish just 'cause we're, the tide would be ripping too much. I mean that would be the only time we were catching rockfish, and I mean, I don't really have, don't really see a problem enclosing the 120 and deeper for the lingcod fishing and stuff, I mean there are good holes that are deeper but…if, that would, I'm not sure what to say on that. Just like with halibut and salmon fishing, I mean I, we never caught any rockfish doing any of that. That's it.

Wayne Palsson: Thank you. Robert Beausoleil

Robert Beausoleil: My name is Robert Beausoleil, and I've lived here all my life in Port Angeles, and I've just got two comments. One is about the notification of how we get the information from you folks. I think it is woefully inadequate. I've lived here all my life and I don't know a lot of these folks that are in here, but I know a few of them. I'm an avid fisherman, and I knew little about your activities until I became a member of Port Angeles Salmon Club and become more aware of what you folks are doing. I think that you need to get what you're doing in all aspects out to the folks and in any possible that you can through the media, through handouts, through postings, and if you do do your phone surveys, at that time give out information. Get this information out there because I think that this is a really small audience compared to what you could have had had there been better notification of your activities and what you plan on doing. I really think so. I think this is woefully inadequate. Um, the second thing I think is happening here is your making classes of fishermen. Okay? I've taken my grandchildren out and teaching them about fish. I'm sure a lot these guys around here have done the same. What I see coming down the pike, in the future, is the inability for a lot of folks to do just this, and a lot of folks that won't be able to fish, period, because they're not going to be able to meet the target dates that are going to be set for fisheries, no matter what it is. I run a restaurant, and I watch the boats coming into town and heading out west everyday and the boats are getting larger and larger and there's fewer and fewer smaller boats like 16, 18 footers, fewer and fewer of those boats out there is an indicator as far as I'm concerned about who's fishing and who's not. And, I think it's going to get worse and the only people that are going to be able to fish in the future are those people who are going to be able to take advantage because they have the financial wherewithal, or they're retired, or whatever the criteria it is that allows them to fish as opposed to the rest of working stiffs out there that just aren't going to have the opportunities because they're so darn limited and so restricted, and I think it's going to get worse and worse and worse and you are making classes of fishermen. This is what one of the results is going to be with these efforts if they come forth. That's my comments for now, but I have more written ones coming your way.

Wayne Palsson: Thank you. Larry Bennett. Uh, Dave Croonquist.

Dave Croonquist: Craig, it's good seeing you guys again. The October meeting, I think it was in Port Townsend was my first input, or opportunity for input on the plan, and the second plan obviously expands on things, I'm concerned or interested in knowing who was the driving force behind adding the Marine Area 4B to the plan. I have my suspicions but I think that that we need to find out why they want to make that into a dive area as opposed to leaving it open for recreational fishing. Just a general comment for the audience, and the comments, Bob just made the comments about the adequacy of the public information on these things, it is, it could be better; the agency could do a much better job of getting the word out. That said, if the individuals go on line at the Department web site, there's a lot of information on there about the plans, but the web site is not the easiest to [?] and navigate unless you know what you're looking for. My general overview on the plan is that there's been a lot of work done; unfortunately I think there's been limited public involvement. The public involvement started after the original draft was done, and I think the public should have been involved much earlier in the whole process. We don't even know yet what impact the sport take restrictions are going to have on the resource, we have been severely restricted on the rockfish for the last couple years. The problems with the fish catch data, I think, is probably reflected in the rockfish catch the same

way it is in the halibut catch, and if the same protocols are used against the…with the creel surveys of the dock multiplied times the telephone surveys which, you know, average somewhere between 1200 and 1600 anglers being called, not all those respond, then whatever comes out that is multiplied, as I understand it, from another Department person against the total license database. You're going to get some really skewed numbers and the 170 halibut a day doesn't fly in this community and the 13,000 rockfish caught, we have some real issues with. We, you mention that the feds are coming out with a listing next week. Unfortunately, big brothers back there in Washington, DC, and federal laws come down, the state can be more restrictive, but they can't more liberal, and I hate to get the state tied into a whole bunch of stuff and then we find out that we might be able to do something differently before we start implementing this rockfish plan.

I have a few other comments that haven't been answered yet, and I think the public needs to know. Number one is: what's going to be the economic impact of this plan on the fishing community? There's charter boat operators, there's boat dealers, there's all the small stores, mom and pop businesses, and these ever increasing restrictive plans, er programs on recreational fishing. You know it is starting to hurt everybody and I think we need an economic impact of this proposed plan before we finalize anything. I'd like to suggest a 5-year plan review, you might rotate it based on your indicator species but there should be a bill date and review plan and if it's not going to work then the plan needs to be either redone or tanked. I mention review of the catch analysis data if it's the [?] system the feds are using the REC fin surveys, it's been mentioned before and I'll just say it again, the data doesn't seem to fit with the information that we see on a daily basis when we're out fishing. There's no projections on the cost of the project. The agency's been taking some severe budget cuts and if you put something in place you better be able to fund it, and I'm not sure the agency has the money to fund ongoing process. I don't see any large indications of what impact the commercial, the non-tribal commercial fishing folks are going to have in this, and I appreciate hearing that the derelict gear program is being looked at, but we need so much diver restrictions on commercial gear so we know who it belongs to. I know they don't like it, but too bad, they're out there and if they're going to lose something, we ought to know who can pay the bill to take that net off of a reef. I have some concerns over the rockfish conservation area, marine protected area concept with the new regulations passed this year, the 20 fathom (120' depth restriction) for fishing for bottomfish. That's going to be 60+ percent of Puget Sound, and I have serious doubts as to whether we need to add any more large areas for either rockfish conservation areas or marine protected areas with 60% of the Sound closed to bottomfish fishing. I don't see any indication in the report about input from the Department of Natural Resources on any habitat work being done. They're the responsible agency for all the tidelands and bottomlands. The Department's in charge of the fish and wildlife resources, but not necessarily the subtidal habitat, and that's going to have to be addressed. I already mentioned derelict gear, but there's also concern over pinniped predation on rockfish and what offset that might have if we had some seal removal and derelict gear removal against the current no bag by recreational fishermen on our rockfish. I have some concerns over how this plan's going to overlap with other federal and state ESA listings that already exist in Puget Sound. We seem to be getting more and more layers from not only Fish and Wildlife, but the Department of Natural Resources, Ecology; everybody's got their idea about what needs to happen and it's just become a real hodge-podge and it's damn near impossible for the public to understand what they can and can't do on the lands and waters that they own and they expect you

folks to be able to administer. I don't think there are enough public meetings for this second draft. I know that the report says that comments were made on the first draft, that you added quite a bit, and have really updated things, and as far as I can tell, this is the only public meeting for people to come and make additional comments on the new updates and they can still do it by, in writing or by contacting the agency, but to hold the meeting in Port Angeles, well yes, the 4B addition does seem to impact us more than others, there's a lot of people who come out here to fish from Sekiu, Clallam Bay, Neah Bay, Port Angeles, and they should have an equal opportunity for input. And that's all I've got tonight. Thanks.

Wayne Palsson: Thank you. Shannon Dewater

Shannon Dewater: I'm kind of like I'm the other one, you know. I'm 33 years old and most of the people in this room are much older and fished a lot longer than I have, but when I'm working steady I make $20 an hour and I can barely afford to do this stuff now. I do it because I enjoy it and I have a good time. You guys keep restricting and making it harder and you making me have to go farther. I can barely afford to fish out of Sequim where I live now. Okay, you start restricting this stuff, well I mean exactly, what's it going to do economically? I pay $100 per pound per fish being a sportsman fisher. I don't want to go buy my fish in the store. If I wanted to buy my fish in a store, I wouldn't go buy a license. I mean, period. What impact that you guys say resolve this decline of these fish and this fish and this fish. Personally, I target halibut, that's my preferred fish. I like to do a little salmon fishing. I don't keep a lot of them because I don't really like to eat them. I'll eat a couple of them. The only time I've ever caught rockfish in any abundance is when I targeted them. I don't catch them when I'm halibut fishing. I target 150 feet of water to 170 feet of water is where I catch all my halibut, and I don't ever catch a rockfish unless I'm targeting wings at 90 feet. From 90 feet to 100 feet is where I target wings, and that's when I start catching rockfish. And, I just think it's ridiculous. That's all I've got to say about it.

Wayne Palsson: Thank you. Phillip Hill. Bill Cargo.

Bill Cargo: I'm Bill Cargo. I'm third generation local resident here, and been a sports fisherman for most of my adult life and adolescence too when my dad fished. You know if you want to go get your arm operated on you go to somebody who knows how to do it. If you want accurate information, you go to the people who are doing it and the only effective way we are all environmentalists here. It doesn't make a difference if we fish, we all want to…But the state is charged with managing this state resource and I understand; I went to the Seattle meetings, the federal international commission now the fisheries. I understand the treaty complexities and with the Canadians, but the only thing we are left to deal with here, and in order to get you folks accurate information is the creel check. The guy over there looking at the boats, the phone calls they're bogus, if you think any more than that you're nuts. You don't belong where you're at. The creel checks and it's going to cost the state, we've got three billion in the hole, whatever it is you know, and they've got budgetary cuts, but if you want to manage this resource, you're going to have to get on board with the creel checks. You're going to have to have more people out there standing on the docks, because I'm a fisherman and here's the deal, if I come back with three fish and I don't have them marked on my card, state Fish and Game can take all my stuff. So that's the first thing I do is mark my card down before I get back to the dock. Now the fish

checkers, they don't have the enforcement to take my stuff, but the game can. I mean you've got the enforcement people – not enough. That's your big problem. You don't have enough people, you've got budget cuts; I've heard it. You've got the budget cuts. I can't put people out of Area 5 especially over in the west side of the San Juans; you're going to have to pony-up and do it. That's it, and I want this on record all the way up to Gregoire and the rest of them. If you want to be effective managers, you're going to have to do this. And another thing, we could just file out punch cards electronically. Get that off the table. Sure, I'm telling you as a sport fisherman I see my punch card at the end of the season, I don't have to turn this in, I can just call up or go on line and punch in numbers. What do you think I'm going to punch in? Do you think I'm going to punch in that I caught a hundred crab last year during my legal season on the summer catch so that you take away the winter crab fishery? I mean, come on you people snap out of it. I punch in zero so I can get my winter crab fishery. So that has to leave too. Unfortunately, human nature is human nature, and you folks are not getting accurate data. You folks are not getting accurate data and this dive park you bracket this whole thing, you make a revised dog gone thing to include Cape Flattery it's absolutely out of this world that you would make accommodations and try to tell me it's for great eco-tourism to make money. Drive to, I don't care, go down through I-5 corridor, go down and see all the boats parking around and see how many dog gone dive tanks you see sitting out there. And it's already, of course you people can read them; just go online to see how big the state industry is for fishing, not diving. And then, to give preferential treatment in a revised edition, and try to stuff that out there; just kiss me once in a while, would you? I'm sorry, but this is very frustrating because I know how the fish are going out there. One more thing, and I appreciate your patience, and I understand that everybody's trying to do the best job possible. I understand that. There's a million ways to catch halibut; you understand the migratory patterns of halibut, be comfortable with it and everything, but the traditional contemporary way that we fish halibut out in Area 6, Area 5 is we concentrate because the way we're fishing with modern gear and downriggers and fish fighters and GPS, we go out in the deep sandy bottoms; no structure, because we don't want structure around. And, if you went out and actually got involved with the fishing you'd understand that. So, to come up with these rules and say we can't fish any deeper than 120 feet because we're trying to guard the rockfish that aren't the predominant, they aren't even the predominant habitat whose structure around here. The predominant ones that happen to be black rockfish, and they're healthy. And, you've got the wrong indicators. That's another one. So, I appreciate your patience and we all want the same thing, but please go back, research where your data is coming from, because you people, either it's a conspiracy…I mean, you can laugh your head off because you're the one getting your dive parks [back?], but it's either a conspiracy or you're just confused because you don't have accurate data. In my heart of hearts I believe you just don't have accurate data, and I would behoove; I would pray that you go back and do it again. Thank you for your patience with me.

Wayne Palsson: Dick King. [Not at this time]. Robert Aunspach.

Robert Aunspach: Hello. My name's Robert Aunspach. I'm a sportsman and I work in a local retail store where I am the manager of the fishing department. There's not one of us here that don't want [?] conservation about these fish, but we don't want to see a blanket regulation that restricts us from fishing a viable resource that has the numbers to support it, i.e., halibut, salmon. And, I would strongly suggest that we would look to see; look long and hard before we make any

decisions made because it's going to affect the community in its fishing industry by hundreds of thousands of dollars, and I don't know if anybody has looked at that economic part of it. But it is hugely; you're talking about job loss; I mean we're talking about it here. Our halibut and our rockfishery – there's structure out there where we know where there's certain types of fish that we know we need to protect, and we should maybe protect those areas, but our…the Strait of Juan de Fuca here Area 6 we do not catch rockfish over 120 feet. If we want to target rockfish, we go under 120 feet. Thank you.

Wayne Palsson: Richard Aksamit.

Richard Aksamit: I've fished this area probably 20, 25 years. I could see regulations keep being tacked on more and more. I think it is just going to get to the point the fishermen are going to get frustrated and just flat ass quit buying licenses and make it more economical to catch the ferry and go up and fish in Canada. Rather than put up with all the regulations and nonsense that you guys just keep tacking on the sportsman. It just gets to the point where you get frustrated and want to sell your boat. So, if you want to keep on tacking on regulations, eventually you just won't have any fishing licenses. That's all I've got to say.

Wayne Palsson: Thank you. Coleman Byrnes

Coleman Byrnes: Coleman Byrnes, Joyce. I've been a life-long sports fisherman. I've also been a commercial fisherman. I've worked in research boats. I have a degree in fisheries, and I've followed the fisheries issues fairly closely, and for people who didn't know about this you can get on the email list of WDFW, and if you are not interested in the stuff you can delete it. That's how I found out about the whole rockfish segments from the emails from the Department. There's no conspiracy to keep you ignorant. Ask and you'll get. [Someone from audience: I didn't say conspiracy; I said it was inadequate notification.] I heard the word conspiracy. But, anyway, I've watched fisheries after fisheries in my lifetime go down the drain. There used to be people making a living fishing cod and halibut in the Puget Sound. There used to be fish processing places in downtown Seattle. There was a huge sport fishery in Puget Sound, and I've always preferred rockfish and some of the unusual fish like Irish lords have always been my favorite fish to catch and they're not there; present in Puget Sound anymore. I've fished a lot between Snohomish County and Bellingham area over the years and I've kind of gone out there. The forage fish are going, and you can…I'm a fish and wildlife biologist and I've been censuring birds for Cornell University as a volunteer along the Straits and over the last 15 years the birds that eat the fish have been declining, so that's a pretty good indication, and I'm not sure, I haven't fish in the west yet, but if there's a good rockfish the people aren't catching their rockfish in Puget Sound and you can't catch them out west, I think you might prevent a buffalo hunt. So, I'm a big fan of rockfish, and I hope you do whatever it needs to protect them. Thank you.

Wayne Palsson: Ken Pinnell. [Ken: I'll put mine in writing.] Okay, those are all the names that I have on the list. Is there anybody else who has not signed up that would like to come forward and make a comment? Would you mind afterward signing in? Please make sure you state your name now.

Chris Mohr: For the record, my name is Chris Mohr. My wife and I have owned and operated Van Riper's Resort out of Sekiu for the last 25 or 30 years. I am here representing the Sekiu Chamber of Commerce. I may not be able to speak to maybe 5000 members, but I would guess that over the last 30 years there's been over 5000 fishermen through our resort. I guess my, my, the basic comment I wanted to make is the broad-based, the broad brush approach you've taken to the Puget Sound. I mean, for the way I think, just think to treat Port Townsend like you treat Neah Bay is absurd. I mean it's ridiculous to think you can take a broad brush and say north and south and everything in between falls between these different parameters. I think it's wrong. Now, with the new revision you're talking about sucking Area 4B into this proposal? That's ridiculous! You've got 20 miles of shoreline there that are probably some of the most productive shoreline, the most productive shoreline in Puget Sound. So, if the idea is to make that some kind of a, oh a management area where we'll just do our eco-tourism for the rest of our lives, that's okay, but you don't say that because it appears to me what you are doing is just using a broad brush – it will be easy to manage, we'll treat the north, the south and everything between will fall in one box or the other. So, I guess my comment would be I would like to see you take something, maybe Freshwater Bay and go west and treat that as a third management area. I believe the productivity and the amount of resource that is there is not near the same as Port Angeles, Port Townsend, the San Juan Islands. So, you know, that would be my comment on that. The other thing is, you know, the Marine Mammal Act, it's, we've saved a lot of marine mammals. Let's face it, they're thriving. Our rockfish populations are going in the toilet as you say, I mean we need to take a look at the marine mammal act and I know the state does not have the power but they can sure make comments that it looks to me like all we're doing now is rockfish to get ate by seals and sea lions. And the third thing, I'll just touch briefly on is, I have to agree with a lot of the testimony here, the phone survey thing doesn't work. And from where I sit the reason it doesn't work is, is you call me and I'm Joe fisherman, and you say to me, "Are you a good fisherman or did you not catch any when you went fishing?" I'm guessing the guy eating his dinner there is going to say, "Well, hell yeah. I caught a couple." And so right there, the whole, I mean you've got your shore site sampling that's done, but I would guess that if you were to take that and overlay it, you going to see a big discrepancy in the amount of catch and on the phone survey I'll guarantee that it will be on the high side. Thank you, and that's my comments. I'll provide the rest in writing.

Wayne Palsson: Thank you, Chris. Okay, it's little bit after 8:00, but this is the last call for anybody else who has not had a chance to comment. And could you also sign in?

Dale Lane: Dale Lane. My name is Dale Lane. I've already signed in. I was called earlier and got to thinking about it, and you know this, this data business it's a complete joke as far as I'm concerned. Halibut, when it comes to halibut anyway. You know we just turned in our halibut cards last year so the state has no data to work on for this year. So they're going to work on the data that we passed in for the 2011 year, and that's a joke. Why in the hell can't they put on the punch card that you have to turn in your punch card within 15 days of the halibut season or you lose your privilege to fish the following year? And, that way, you guys would have data that was up to date, that was new, that was brand new for this year, but no, you've got to wait until April of 2011 before you get the data and then you don't use it. That's all I've got to say.

Wayne Palsson: Okay. Anybody else? Okay, that will close the comment period for this evening. If you folks have more questions, as we clean up we'll be available. So, I thank you all for coming and we really appreciate all your comments because, believe it or not, they do help to guide us in our plans.