Ashbrook, Charmane E (DFW)

From: Gariepy, Erin K (DFW)
Sent: Thursday, February 07, 2013 9:27 AM
To: Burley, Craig C (DFW)
Cc: Ashbrook, Charmane E (DFW); Davidson, Cathy A (DFW)
Subject: FW: Marine Area 4B rules: Rockfish, Cabezon, Lingcod
Attachments: OCNMSREEFdata2003-2012.pdf

Hi Craig – I'm not sure if you saw this comment. We received it October 2012. Thanks ~Erin

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From: Janna Nichols [mailto:nwscubamom@comcast.net]
Sent: Friday, October 26, 2012 11:55 AM
To: Commission (DFW)
Subject: Marine Area 4B rules: Rockfish, Cabezon, Lingcod

Friday, October 26th, 2012

Dear WDFW Commissioners,

As you consider changes to the recreational fishing regulations, I am pleased to see your efforts in rule proposals #65 and #69 about Cabezon minimum size limits and reducing the lingcod season in MA 4B. While these changes are definitely on the right track, WDFW will need to go further to reduce the amount of protected Rockfish bycatch associated with Lingcod and Cabezon.

From the 2011 WDFW Puget Sound Rockfish Conservation Plan:

"Rockfish in Puget Sound are in trouble. Many, but not all, rockfish species have declined in abundance, some quite severely, over the past two decades. The 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."
(my emphasis added in bold)

Rockfish populations are not increasing - nor are they even staying the same. They are decreasing (as I will show in data below and attached graphs). Responsibly managing our marine resources for bottomfish should show **INCREASING** numbers of bottomfish. Instead, numbers are still declining.

I have three main concerns:

- Decreasing numbers of Rockfish in the Olympic Coast National Marine Sanctuary (Marine area 4B).

- Decreasing numbers of Cabezon and Striped Perch in the Olympic Coast National Marine Sanctuary (Marine area 4B)

- Disconnect between regulations of Cabezon as compared to Lingcod.

First, some background information. Although I am employed by REEF (Reef Environmental Education Foundation) as their Outreach Coordinator and will share REEF data with you, I am not writing on their behalf today. I am writing strictly for myself as a Washington state citizen. REEF data is housed in a publically accessible online database.

I began doing volunteer underwater surveys for REEF (Reef Environmental Education Foundation) in Washington in 2001, and have personally conducted 516 of them in Washington waters. Each survey is one dive, so that's a lot of diving. In Washington there have been over 11,000 REEF surveys conducted by volunteers since 1998. There are currently over 1800 REEF members residing in Washington. Experienced volunteers are invited to be on the REEF Advanced Assessment Team.

For the past 10 years members of this specialized team of experts convene in Neah Bay for a week long annual survey of selected sites within the Olympic Coast National Marine Sanctuary, part of Marine Area 4B. These surveys are conducted in August of each year, and have included anywhere from 6-12 divers, each conducting two dives per day. Each survey trip has resulted in anywhere from almost 50 surveys to 100. It is no small effort. The sites are quite consistent, with data being gathered annually from 8-10 sites.

I have created a summary of our survey findings within the area from Koitlah Point out to Cape Flattery over the past 10 years, which you can be seen on the attached handout. **When looking at the graphs, it is important to look at both the Sighting Frequency, as well as the Density Score.** On fish that are typically seen as individuals (such as Cabezon), the Sighting Frequency is even more notable.

The Sighting Frequency is basically the percentage that a diver would encounter a given species on a dive. A SF of 70 would mean that divers encounter that species on 70% of their dives. The Density Score ranges from one to four. 1 represents a single fish seen on the survey dive.

- 2 represents anywhere from 2-10 fish seen on the survey dive.
- 3 represents anywhere from 11 to 100 fish seen on the survey dive.
- 4 represents over 100 fish seen on the survey dive.

More information on how to interpret REEF data can be found here:

http://www.reef.org/programs/volunteersurvey/interpreting

My first concern is for rockfish. The declines in the number of rockfish we are seeing on our surveys is very troubling. From Blacks to Blues, to Coppers, Quillbacks, Chinas and Tigers, the numbers are decreasing. This past season (August 2012) ten divers diving 8 sites over 4 days failed to detect a single Tiger Rockfish! The schools of Blacks that I see underwater are not as frequently encountered, nor as dense as in years past.

I am concerned that bottomfish sportfishing effort is furthering significant declines in our last, best community of diverse rockfish species in Area 4, particularly now that it is focused in depths less than 120 feet. *The high bycatch rates of rockfish while fishing for Lingcod and Cabezon is too great. (per WDFW's own 2011 test fishery)*

My second concern is with other species, such as Cabezon and even Striped Perch. The numbers for both of those species is especially alarming. Please consider changing the sportfishing regulations to better manage these dwindling populations.

Thirdly, Cabezon have become very uncommon in Puget Sound. It is a rare instance that divers encounter these, not only out in MA4B, but elsewhere in Puget Sound. (except for the protected area of Edmonds Underwater Park, which has many of them). Lingcod are found in greater abundance in Washington waters. It is not unusual at all to see a lingcod on a dive. The survey numbers reflect this.

Yet the limit for Cabezon in MA4B is 2 per person **year round**. Lingcod, which are found in greater abundance, have a more restricted season. Elsewhere in Puget Sound, Cabezon have an 8 month season, with 2 allowed per day. Yet lingcod retention is only 1, for a 6 week season. Please manage the Cabezon population in Washington with **at least** the same respect and attention that you have for Lingcod.

Some Specific Things You Can Do:

- Change the Daily Lingcod Limit in MA 4B from 2 to 1 Lingcod per person per day.
- Add a maximum size limit on Cabezon to protect the larger breeding females.
- Reduce the daily limit of Cabezon in Puget Sound from 2 to 1 per person per day.
- Shorten the Cabezon season in Puget Sound to 6 weeks, to align with the Lingcod Season.

We need to be **rebuilding** our populations to levels approaching what we had in 1970, not accepting the depressed numbers of fish we have become use to in the past few years. To properly manage the bottomfish species in Washington, **the Sighting Frequencies and Density Scores should be increasing**, not decreasing or even staying the same.

Rockfish populations take awhile to rebuild, yet can be depleted very quickly. We have already depleted our rockfish populations in the rest of Puget Sound. Now we see it happening in the Neah Bay area. We should know better in 2012. Please move forward quickly to protect and rebuild our bottomfish populations in Washington.

Thank you for your consideration. I am happy to answer any questions you might have.

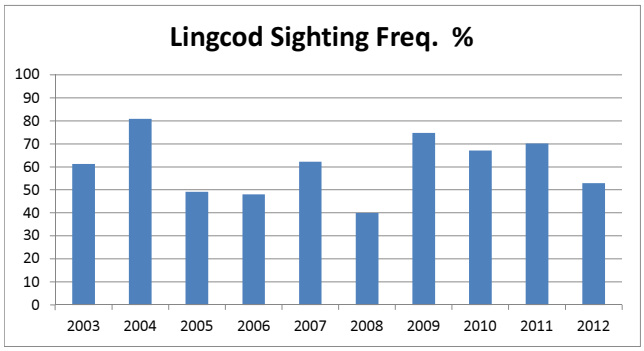
Janna Nichols

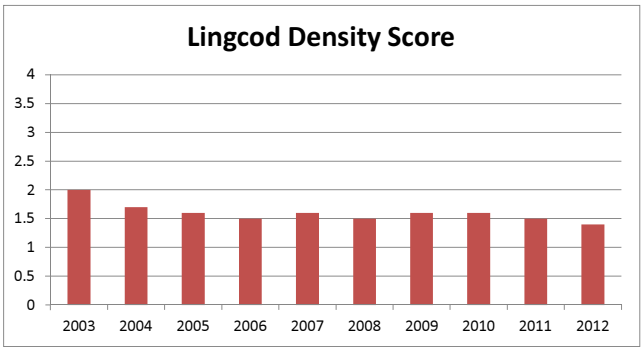
17015 NE 37th Circle

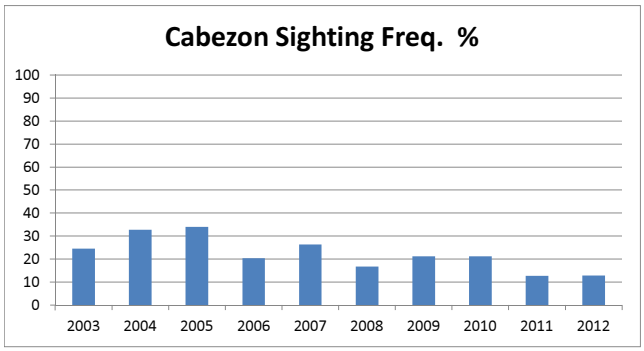
Vancouver, WA 98682

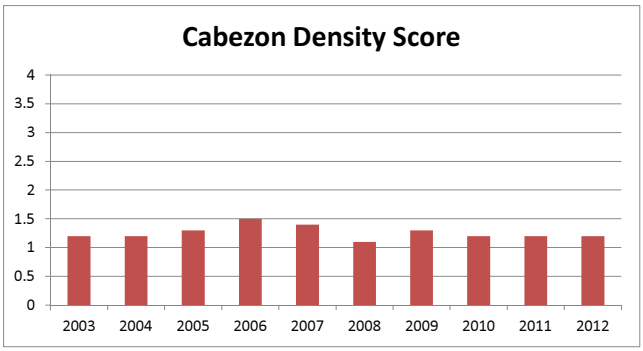
Olympic Coast National Marine Sanctuary REEF Data 2003 - 2012

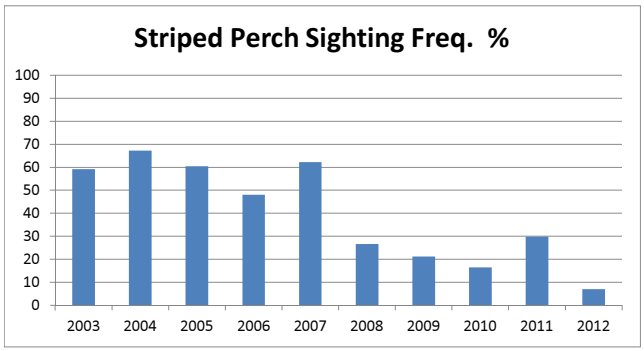
Prepared by Janna Nichols

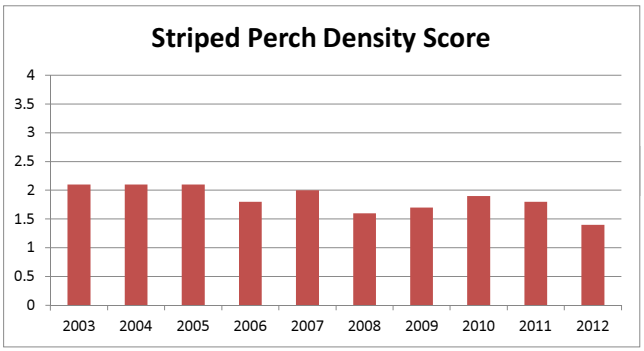


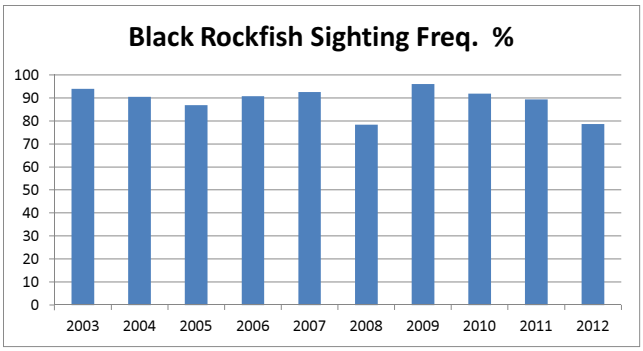


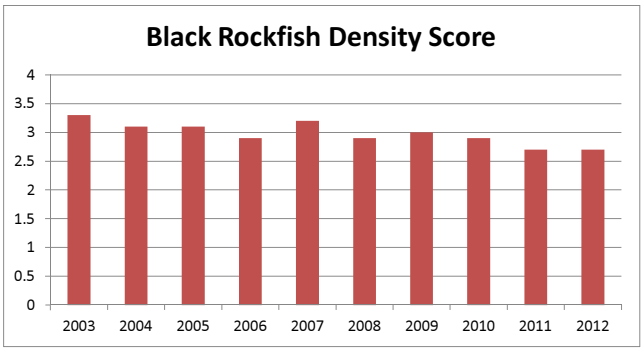


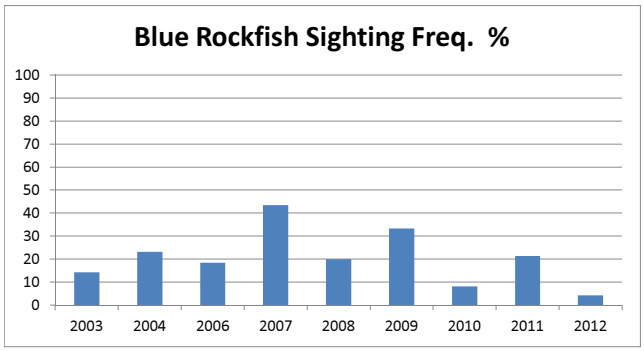


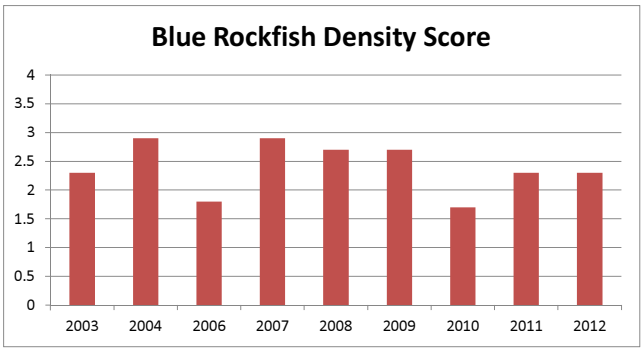


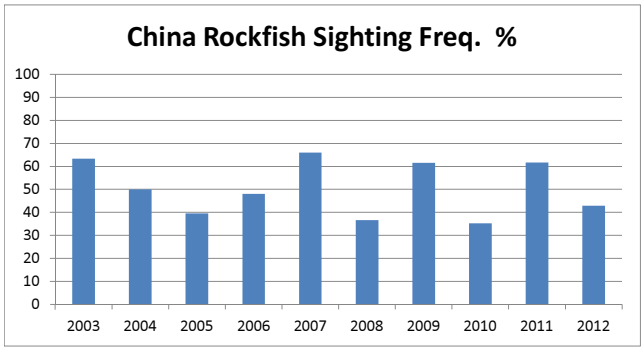


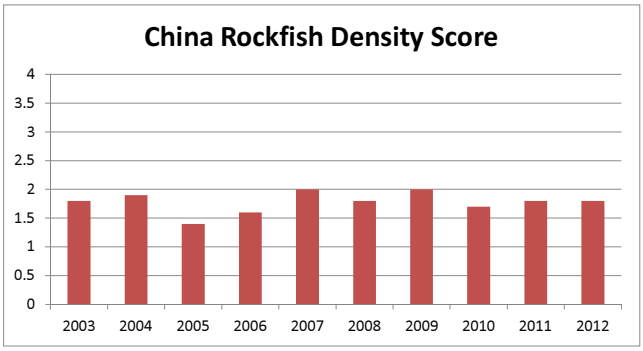


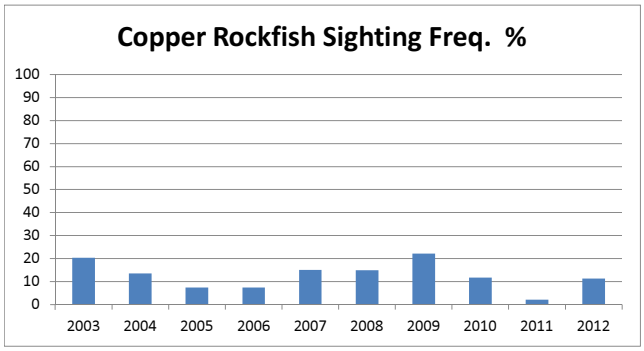


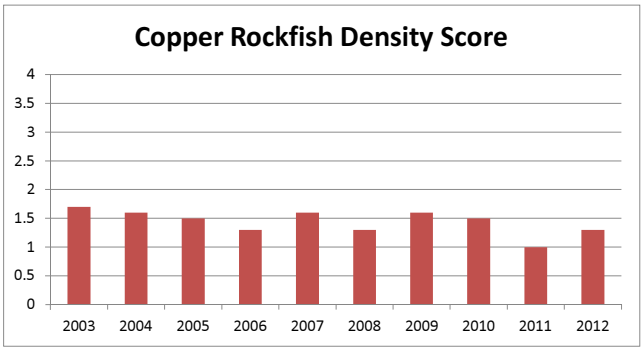


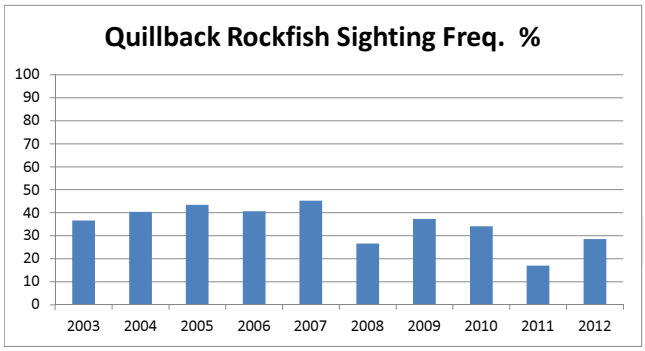


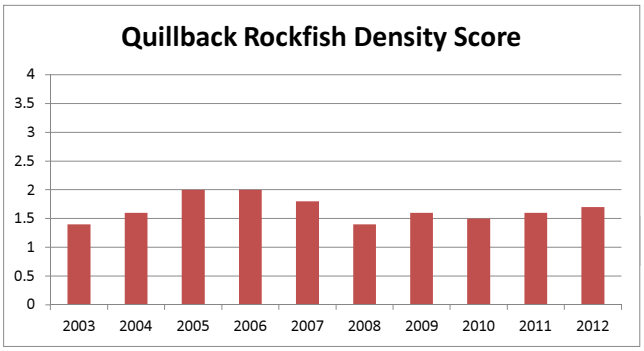


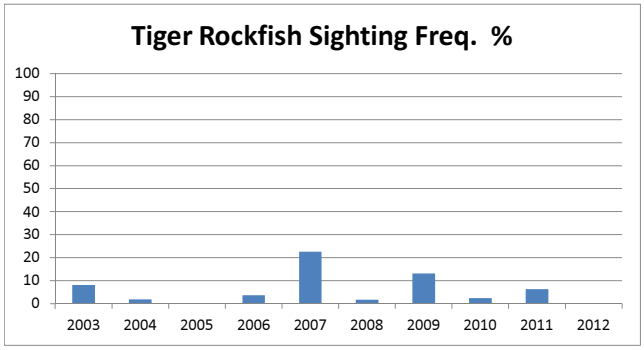


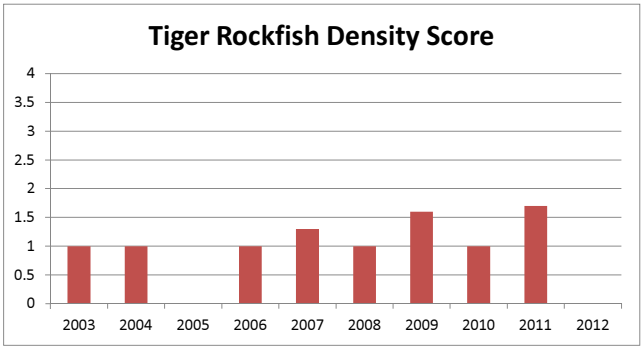








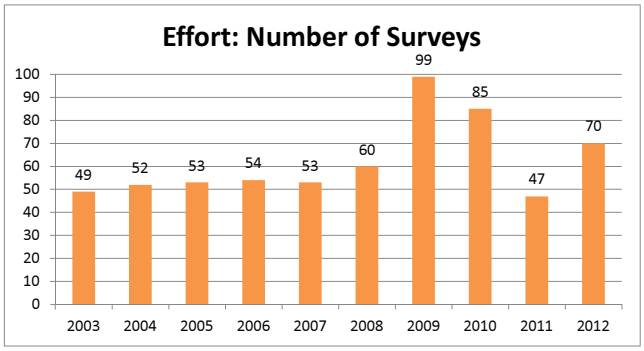




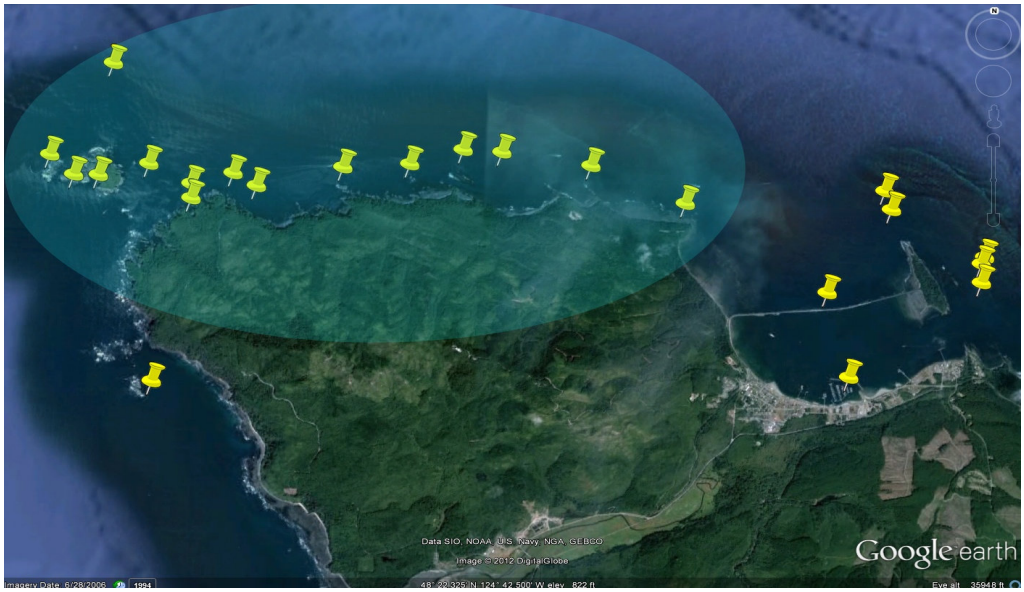
Data compiled from zone code 270301 (Koitlah Point to Cape Flattery)

Density Codes:
1=A single fish
2=Anywhere from 2 to 10 fish
3=Between 11 and 100 fish
4=Over 100 fish

See www.reef.org for more details
REEF Director of Science: Christy Semmens, christy@reef.org



Map of sites where data for above charts was collected



List of fish species sighted during past 10 years (2003 - 2012) in order of sighting frequency

1 Kelp Greenling
2 Black Rockfish
3 Longfin Sculpin
4 Lingcod
5 China Rockfish
6 Scalyhead Sculpin
7 Juvenile (YOY) Rockfish - Unidentified
8 Red Irish Lord
9 Striped Seaperch
10 Quillback Rockfish
11 Cabezon
12 Blue Rockfish - generic ID
13 Yellowtail Rockfish
14 Mosshead Warbonnet
15 Spinynose Sculpin
16 Copper Rockfish
17 Unidentified Sculpin
18 Manacled Sculpin
19 Wolf-Eel
20 Puget Sound Rockfish
21 Canary Rockfish
22 Tiger Rockfish
23 Buffalo Sculpin
24 Tube-Snout
25 Grunt Sculpin
26 Longfin Gunnel
27 Pacific Sandlance
28 Whitespotted Greenling
29 Canary Rockfish YOY
30 Blackeye Goby
31 Yellowtail Rockfish YOY
32 Vermilion Rockfish
33 Painted Greenling
34 Decorated Warbonnet
35 Black Rockfish YOY
36 Kelp Surfperch
37 Rosylip Sculpin
38 Crescent Gunnel
39 Smoothhead Sculpin
40 Sailfin Sculpin
41 Yelloweye Rockfish
42 Brown Irish Lord
43 Sharpnose Sculpin
44 Silverspotted Sculpin
45 Shiner Surfperch
46 Speckled Sanddab
47 Pacific Herring
48 C-O Sole
49 Padded Sculpin
50 Great Sculpin
51 Marbled Snailfish
52 Blue Rockfish - Blue Sided species
53 Unidentified Rockfish
54 Widow Rockfish
55 Lobefin Snailfish
56 Penpoint Gunnel
57 Dusky Rockfish
58 Pile Perch
59 Copper Rockfish YOY
60 Rock Sole
61 Striped Kelpfish
62 Unidentified Gunnel
63 Kelp Clingfish
64 China Rockfish YOY
65 Yelloweye Rockfish YOY
66 Blue Rockfish YOY
67 Unidentified Snailfish
68 Brown Rockfish
69 Smooth Alligatorfish
70 Slender Cockscomb
71 Saddleback Gunnel
72 Silvergray Rockfish
73 Northern Anchovy
74 Snubnose Sculpin
75 Unidentified Surfperch
76 Sharpnose Seaperch
77 Roughback Sculpin
78 Northern Clingfish