



SCHOOL OF VETERINARY MEDICINE
WILDLIFE HEALTH CENTER
UNIVERSITY OF CALIFORNIA
(530) 752-4167
FAX (530) 752-3318
<http://www.vetmed.ucdavis.edu/whc>

ONE SHIELDS AVENUE
DAVIS, CALIFORNIA 95616-8734

November 12, 2009

Lori Preuss, WDFW Rules Coordinator
Washington Department of Fish and Wildlife
600 Capital Way North
Olympia, WA 98501-1091

Dear Ms. Preuss:

Over the last decade, the SeaDoc Society has funded and conducted nearly \$3 million in scientific research on marine fish and wildlife of the inland marine waters of Washington and British Columbia. Findings from this research are shared with managers, policy makers and private citizens so that we can improve management and policy as we design a healthy ecosystem for people and wildlife. We have reviewed the package of proposed changes to the 2010-2012 rules governing recreational fisheries for game fish, food fish, and shellfish and welcome the opportunity to comment on several of the proposed rule changes. Specifically:

#7. Unclassified Marine Fish and Invertebrates: This proposal would close all harvest of unclassified marine fish and invertebrates.

In his 1997 report entitled "Protection and Restoration of Marine Life in the Inland Waters of Washington State" (Puget Sound / Georgia Basin Environmental Report Series: Number 6), West stated that the harvest of unclassified marine invertebrates has risen dramatically in recent years. While in many cases, little is known about their abundance, distribution, life history or ecology, many of these species are thought to be sensitive to overharvest and other anthropogenic stressors. From a precautionary principle, closing harvest of all unclassified marine fish and invertebrates makes good scientific sense and is warranted, especially in light of the fact that current harvest is not actively managed or monitored. We strongly support this proposal.

#8. Daily Limit for Other Food Fish: This proposal is for species of food fish for which no daily bag limit has been established; the proposed daily limit would be 2 fish of any species.



THE SEADOC SOCIETY

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942 Deer Harbor Road, Eastsound, WA 98245

Phone: (360) 376-3910 Fax: (360) 376-3909

<http://www.seadocsociety.org>

Similar to the harvest of unclassified marine invertebrates discussed above, there are species of food fish harvested that are not actively managed or monitored. Limiting the daily harvest of species of food fish for which no daily bag limit currently exists is a prudent conservation measure. The clause to modify the rules through the emergency rule process to increase harvest if large numbers of any of these species were to occur in Washington waters in future years is a good one and we support this proposed rule change, especially if harvest changes are accompanied by monitoring.

#9. Lingcod Rules: There are two proposed lingcod rules: (1) to align the lingcod seasons and slot limits for spearfishers with those of anglers in Marine areas 5-11 and 13 and (2) to change the upper size of the slot limit for lingcod from 40” to 36”.

Regarding the aligning of the seasons and slot limits for spearfishers, this is fair for both classes of recreational harvesters. The proposed rule to decrease the upper slot limit from 40” to 36” is a good one and we fully support it, especially in light of it affording extra protection to female ling cod. Respecting ecosystem integrity is a well accepted ecological principle for designing healthy ecosystems ([Gaydos et al., 2008. Top Ten Principles for Designing Healthy Ecosystems like the Salish Sea. *EcoHealth* 5:460-471](#)). An intact ecosystem has a complete suite of species and a full range of size and age classes of each component species, which includes the need to protect healthy adult female lingcod.

#10. Rockfish and Bottomfish Rules: Proposals: (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.

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. Since at least 2002, 13 species of rockfish have been candidates for listing by Washington State (Gaydos and Brown. 2009. Species of concern within the Salish Sea Marine Ecosystem: changes between 2002 and 2008. *In* Proceedings of the 2009 Puget Sound Georgia Basin Ecosystem Conference, Seattle, WA, February 2009). Increased harvest restrictions, including the one per day limit, have failed to recover rockfish populations. Therefore, more stringent measures are needed to restore rockfish, both for the ecosystem services they provide as well as for future recreational fishing opportunities. We strongly support proposals 1, 2, and 4. Regarding the daily limit of 10 black and blue rockfish in Marine Area 4 east of the Bonilla –Tatoosh line (Proposal 3), we would like to see data presented that support that this level of recreational fishing pressure is warranted and that WDFW will be actively monitoring harvest to ensure that it is sustainable.



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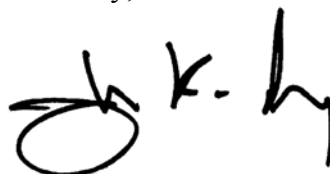
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Thank you again for the opportunity to provide comment. We appreciate WDFW's effort to provide sustainable fishing opportunities while ensuring the health of the ecosystem and the fish and wildlife it supports. Please do not hesitate to call or email me (jkgaydos@ucdavis.edu) if you have any questions about the comments provided or desire copies of the literature cited.

Sincerely,

A handwritten signature in black ink, appearing to read "j k. gaydos". The signature is stylized with a large, circular initial "j" and a long, sweeping underline.

Joseph K. Gaydos, VMD, PhD
Chief Scientist, SeaDoc Society



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