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April 29, 2010

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 comment on the Department of Fish and Wildlife's revised Draft Environmental Impact Statement (DEIS) for the Puget Sound Rockfish Conservation Plan. I appreciate the work that you and the rockfish advisory group have done to improve the original DEIS issued in October 2009 and see where many of my comments on the first Draft have been addressed in this version. Hopefully you also will find these comments helpful as you prepare a final Environmental Impact Statement.

As I have mentioned previously, the SeaDoc Society is a science-based organization and 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. Naturally, we applaud that one of the objectives of the Draft Puget Sound Rockfish Conservation Plan is to "use the best available science, sound fisheries management, and professional judgment to achieve excellence in stewardship of public resources."

Regarding the use of best available science, I question the decisions made concerning the policy area of "Enhancement," (3.3.8). In your discussion of hatchery production you mention the potential that the collection of wild adult rockfish for culture could cause mortality of adult rockfish during capture or captivity, but you do not address the far greater concern that that captive rearing and release of young rockfish has the potential to introduce diseases back into the wild population of rockfish. Mortality of a small number of fish during a capture operation pales in comparison to the widespread mortality that could occur if hatchery-reared fish were to introduce a virulent disease to wild fish. This has occurred in other captive propagation efforts to recover endangered species. For example, there is convincing evidence that the bacterium *Candidatus Xenohalictis californiensis* was introduced into northern California's healthy abalone populations via the outplanting of hatchery-reared abalone



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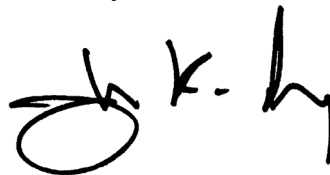
before the bacterium was even identified as the causative agent of withering syndrome in abalone (Friedman and Finley. 2003. Can. J. Fish. Aquat. Sci. 60: 1424-1431). In this section you also fail to address the potential for hatchery-reared and released rockfish to impact the genetics and fitness of wild rockfish populations. This is a demonstrated concern in other species of marine fish. It has been shown that in Pacific salmon, artificial propagation can rapidly and substantially reduce the fitness for natural spawning and rearing (Reisenbichler and Rubin. 1999. ICES J. of Mar. Sci. 56:459-466).

In the discussion of artificial habitat in Chapter 3, you fail to mention that artificial habitats or reefs likely do not provide the same quality of habitat as do natural habitats. You make this point, and even include a scientific citation in section 2.4.4, yet this is not brought up in Chapter 3. Under the Enhancement section (3.3.8) it is stated “(a)s needed, artificial habitat will be constructed to enhance, or increase available habitat for rockfish populations,” yet there are no scientific data showing that rockfish populations are in decline due to limitations in suitable habitat.

Despite the lack of evidence that hatchery production and artificial habitat construction are biologically or economically sound options, your most conservative alternative and preferred option still include the use of hatchery production and artificial habitat construction. Why? Without sound scientific support for these options, why is does the most conservative option still contain some level of hatchery production and artificial habitat construction? Furthermore, the descriptions used for Enhancement alternatives 1, 2, 3 and 4 are difficult to understand as written and do to portray a clear option gradient of most conservative to least conservative.

I appreciate you addressing these concerns as you develop the final EIS. It is exciting 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) if you have questions about these comments.

Sincerely,



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



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