

February 1, 2011

Martha Kongsgaard, Chair
Puget Sound Leadership Council
Puget Sound Partnership
P.O. Box 40900
Olympia, WA 98504-0900

Miranda Wecker, Chair
Washington State Fish and Wildlife Commission
600 Capitol Way North
Olympia, WA 98501

Dear Madam Chairs,

We, the undersigned organizations and our members, call upon you and your organizations to provide the necessary leadership to establish a network of Marine Reserves and Marine Protection Areas in Puget Sound.

Three Puget Sound rockfish species are sufficiently depressed to warrant their listing as Threatened or Endangered under the Endangered Species Act – and several other groundfish species are being considered for protection. Washington Department of Fish and Wildlife (WDFW) data show dramatic reductions in the biomass of many Puget Sound groundfish stocks; precipitous declines in abundance that started in the early 1980s and continue today. Puget Sound groundfish make up a significant and integral part of the Puget Sound ecosystem; with these populations a fraction of their likely historical abundance, the ecological integrity of Puget Sound is at serious risk.

Puget Sound rockfish are uniquely susceptible to overfishing because some species live to be well over 100 years old, reproduce only sporadically, and rarely survive a catch and release fishery. Still, tens of thousands of Puget Sound rockfish and other groundfish are caught and killed each year in poorly-monitored fisheries and as by-catch.

With many rockfish and other groundfish populations still in the same steep decline that started in the early 1980s it is clear that the precautionary principles of conservation ecology, embraced by WDFW in its Draft Puget Sound Rockfish Conservation Plan¹ and Puget Sound Groundfish Management Plan², have been insufficiently enacted to stabilize, much less restore, our Puget Sound groundfish populations.

Recent scientific research has demonstrated that Marine Reserves (MRs) and Marine Protected Areas (MPAs), underwater parks where, respectively, fishing is prohibited or restricted, are extremely effective at recovering depressed populations of fish – especially those like rockfish that exhibit high site-fidelity. Effective MR and MPA networks that protect rockfish have been established in California, Oregon, and British Columbia.

Research has shown that an effective network of science-based Marine Reserves established across large seascapes like Puget Sound can improve sportfishing opportunities for groundfish. Increased survival and breeding success within Puget Sound reserves will result in spillover to adjacent open waters, and rebuilds stocks across the Sound. Given a targeted respite from fishing pressure, rockfish can flourish and in time support a sustainable fishery. In addition, trophy fisheries often develop along the perimeter of reserves.

¹ <http://wdfw.wa.gov/conservation/fisheries/rockfish/>

² <http://wdfw.wa.gov/publications/pub.php?id=00927>

Other fish and invertebrate species have also been shown to thrive in MRs, as explained in a recent PISCO publication³ authored by Dr. Jane Lubchenco – now President Obama’s administrator of the National Oceanic and Atmospheric Administration. Further, despite skeptics’ expectations, local community economies are often unimpacted or improved following the addition of MRs as non-consumptive recreation increases and fisheries recover.

Past management actions have been insufficient to reverse or even slow the documented decline in many Puget Sound groundfish species. We commend WDFW for their recent action to close areas of Puget Sound below 120’ deep as well as Hood Canal to bottomfishing. We think this is a good step in the right direction, but as acknowledged in WDFW’s Draft Puget Sound Rockfish Conservation Plan, alone this step is insufficient to achieve the needed restoration objectives.

It is clear that conventional fishing management tools alone, including season and gear restrictions, have been insufficient to protect Puget Sound groundfish from overharvest. Marine Reserves and Marine Protected Areas are identified as fundamental but as yet unrealized tools in WDFW’s Groundfish Management Policy (1998), in the Draft Puget Sound Rockfish Conservation Plan (2010), and in Fish and Wildlife Commission Policies^{4,5} (1996,1998) on groundfish and marine protection areas. The time is now to establish a network of science-based Marine Reserves in Puget Sound.

We request your consideration of the following calls to action:

- We call upon the Puget Sound Partnership (PSP) to incorporate Marine Spatial Planning for defining Marine Protected Areas in the upcoming revision of the Puget Sound Action Agenda.
- We call upon the Washington Fish and Wildlife Commission (FWC) to coordinate the collection and synthesis of the needed physical and biological information on marine habitats, forage fish and groundfish life-history requirements, population structure, known spawning and rearing areas, and areas of high species richness and abundance to help provide the necessary information for guiding designation of an effective science-based network of Marine Reserves in Puget Sound.
- We request establishment of a Marine Reserve Scientific Advisory Group that consists of independent specialists in marine ecology and conservation who are expert in creating science-based networks of marine reserves to meet specific conservation objectives; there are several qualified individuals in the Pacific Northwest that we are glad to recommend. The Scientific Advisory Group should be tasked with identifying attainable objectives and developing a strategic network of marine reserves throughout Puget Sound to meet those objectives. The Advisory Group should also identify such specifics as: a study design for the collection of data to evaluate the effectiveness of the MRs; an effective MR enforcement protocol; and the development of adaptive management thresholds that trigger if and when MR protection can be removed.
- We request establishment of a Marine Reserve Stakeholder Advisory Group. This stakeholder group will work with the independent scientific advisory group help identify attainable objectives and provide feedback on implementation topics

³ <http://www.piscoweb.org/outreach/pubs/reserves>

⁴ <http://wdfw.wa.gov/commission/policies/c3003.html>

⁵ <http://wdfw.wa.gov/commission/policies/c3013.html>

including effective enforcement protocols and adaptive management thresholds that trigger if and when MR protection can be removed.

- We request that PSP and FWC establish specific benchmarks and timelines so that the leadership of both entities, and stakeholders, can set performance accountability measures. The need for protection of our declining Puget Sound groundfish stocks is dire. Marine Reserves must be established within 3 years (by 2014) if we are to be able to begin to assess their effectiveness within the 2020 Puget Sound Partnership timeframe.

Restoring fundamental fish communities in Puget Sound will require a commitment to a scientifically rigorous MR network that will encompass a significant portion of Puget Sound, a commitment to monitoring and enforcement, and a commitment to leaving the reserves in place for an appropriate amount of time. There is also urgent need for public outreach and education, for while MRs embrace WDFW's written policies regarding the precautionary principle and managing to the weakest stocks, what is proposed is a significant and necessary departure from our conventional fisheries management.

We appreciate the time and resources required to develop and implement an effective MR network in Puget Sound. We commit to working with the private sector, the nonprofit community and our state and federal agencies and legislatures to identify and secure the fiscal resources necessary to conduct this essential science-based planning and associated stakeholder engagement. We believe we have no time to waste if we are to restore Puget Sound.

Respectfully,

- Doug Myers, Director of Science. People For Puget Sound
- Jamie Glasgow, Director of Science and Research. Wild Fish Conservancy
- Norman Baker, Ph.D. Sierra Club, North Olympic Group
- John Keller, President. Canadian Marine Environment Protection Society
- Anne Shaffer, Executive Director. Coastal Watershed Institute
- Roy Mulder, President. Marine Life Sanctuaries Society of British Columbia
- Jill Silver, Executive Director. 10,000 Years Institute

Cc: *Governor Christine Gregoire*

Senator Kevin Ranker

Representative Brian Blake