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Olympic Park Associates --  
Founded in 1948

Spring, 2001

## Wild Washington Campaigns to Protect Olympic Roadless Areas

by Susan Melrose

Washington Wilderness Coalition, Grassroots Coordinator

Since last summer, the Washington Wilderness Coalition has been working with our members and other wilderness enthusiasts from the Olympic Peninsula to secure a higher level of protection for wild places in the Olympic National Forest. Peninsula locals from Port Angeles to Brinnon have been exploring and documenting these beautiful wilderness areas, proposing boundaries for their protection and building support in their communities. The main objective is to gain permanent protection as Wilderness for these special places that were left out of the 1984 Wilderness Act. These community-based activities are in participation of the statewide Wild Washington Campaign, of which Olympic Park Associates is a supporter.

OPA was the peninsula's leader for the wilderness campaign that led to the 1984 Wilderness Act. That statewide effort resulted in the designation of five Wilderness areas: the Buckhorn, Brothers, Mt. Skokomish, Wonder Mountain and Colonel Bob. Today's campaign is seeking protection for many pristine areas adjacent to the existing Wilderness areas and also for areas that would not be wilderness additions. Though the total acreage of our draft wilderness proposal has not calculated, estimates put it at over 100,000 acres being proposed for permanent protection.

**The idea of wilderness needs no defense,  
only more defenders.**

*Edward Abbey*

Today's campaign is seeking protection for many pristine areas adjacent to the existing Wilderness Areas and also for areas that would not be wilderness additions. Though the total acreage of our draft wilderness proposal has not



*View of the Buckhorn Wilderness from Dirty Face Ridge, one of the areas identified as needing protection by the Wild Washington coalition. Photo by Susan Melrose.*

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#### **Next OPA Board Meetings**

Kingston Community Center  
May 30, 6 p.m.  
Sep. 26, 6 p.m.

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### **Profile: Paul Crawford, of Port Angeles, Joins OPA Board**

Olympic Park Associates is delighted to welcome to the Board of Trustees a lifelong advocate for wise

been calculated, estimates suggest that more than 100,000 acres are being proposed for permanent protection.

Protecting these areas is a great step towards protecting salmon. Many of the salmon and steelhead runs of the Olympic Peninsula are depressed and even listed as endangered or threatened - especially on the Hood Canal. Governments from local to federal are mandated to aid in the recovery of this indicator species. By protecting these forests from logging and other destructive practices, these critical watersheds can do their job of cleaning the water, preventing erosion, and sheltering our streams and rivers for juvenile fish. These forests are far more valuable as a refuge for our wild salmon and steelhead than as opportunities for more logging and road-building. Wilderness is the strongest and most durable level of protection for wild lands. These forests on the Olympic Peninsula merit this type of protection for the salmon, the wildlife and our future.



*Dungeness River. Photograph by Caitlin McNamara.*

All of the wild and roadless areas on the Olympic Peninsula are being proposed for protection - but the following are some highlights.

- On the northwest corner of the forest, the Bogachiel River flows through the unprotected Elk-Read roadless area.
- The Buckhorn Wilderness has over 20,000 acres of Wilderness additions that includes much of the middle portion of the Dungeness River's watershed, the last unprotected pieces of the Grey Wolf watershed, Mt Hamilton and the little gem of Sink Lake.
- Cut from the '84 bill, the Upper Skokomish River Valley and Lightning Peak are top areas to receive protection this time around.
- Finally, there is South Quinault Ridge. Doesn't the largest rainforest in the Olympic National Forest merit formal protection?

There are many special places for protection, and many special people are needed to help. Folks are needed to hike and explore these areas and advocate for their protection.

stewardship of our national parks, Paul Crawford.

Paul is a recent retiree from the National Park Service where he spent 35 years, beginning in 1966 as a Park Ranger at Lassen Volcanic NP, followed by three winters at Crater Lake under 50 feet of snow, and then 28 years at Olympic National Park.

For most of his tour at Olympic he has been a Natural Resources Management Specialist, involved in developing three editions of the Natural Resources Management Plan, the Fire Management Plan, and concept plans for Ozette, Quinault, Kalaloch, Sol Duc, and Lake Crescent. His expertise has touched every corner of the park: bears, mountain goats, anadromous fish, marine habitat, wilderness management, protection from coastal oil spills,...

Paul is a devoted teacher of wilderness philosophy, land use ethics, and natural resource stewardship. He has trained park employees, enlightened the general public, and appeared in KOMO-TV and BBC productions on national parks and wilderness.

Paul brings to OPA the gift of his wealth of experience and dedication to the stewardship of our natural

## Some Roadless Areas In the Olympic National Forest That Merit Stronger Protection

[Du](#)

(click on map for a larger size in a new window)

- |                                           |                           |
|-------------------------------------------|---------------------------|
| 1. Elk-Read                               | 10. Jupiter Ridge         |
| 2. Rugged Ridge                           | 11. Lena Lake             |
| 3. Mt. Muller                             | 12. Three Rock            |
| 4. Mt. Baldy / Madison Creek              | 13. Lightning Peak        |
| 5. Canyon / McDonald Creeks               | 14. Upper Skokomish River |
| 6. Lower Gray Wolf / Three O'Clock Ridge  | 15. Moonlight Dome        |
| 7. Middle Dungeness / Dirty Face Ridge    | 16. South Quinault Ridge  |
| 8. Mt. Zion / Green Mountain              | 17. Sams River            |
| 9. Hamilton Mtn / North Dosewallips Slope |                           |

### Volunteers needed: hike and explore these areas, and advocate for their protection

To get involved with activists near you, contact:

Susan Melrose  
Washington Wilderness Coalition  
866-526-3487  
e-mail [susan@wawild.org](mailto:susan@wawild.org)

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environment, packaged inside an engaging personality.

Welcome, Paul.

## Edward Tisch, OPA Board Member, Passes the Legacy On

Peninsula College Professor Edward Tisch, a long-time OPA board member, was recently featured in an article by reporter Ken Short in the *Peninsula Daily News*.

Tisch has taught biology at Peninsula College for more than 35 years, in the course of which he has befriended some 6,000 students. Quoted in Short's article, Tisch says, "I love them all."

Tisch grew up Catskill Mountains of New York State, earned a master's degree in wildlife biology at the University of Montana, spent two years in the Peace Corps in South America, and finally settled down in 1965 to teach at Peninsula College, where he has been ever since.

"I developed a deep love for nature," Tisch is quoted as saying. "I realized that from the day I was big enough to realize I was a human being."

He was influenced by John Burrows, poet Robert Frost, and first-generation Irish

immigrant Mary Hughes.

Tisch inspires his students and even has involved them in research. One former Tisch student, Rick Skelly, had the opportunity to collaborate with Tisch on a scientific article announcing the discovery of a new species of saxifrage (appropriately named Tisch's saxifrage).

OPA members are fortunate to be able to enjoy Tisch's delightful and authoritative botanical articles in the *Voice of the Wild Olympics*. His topics have included: the high, dry Olympics, a botanical wonderland (1998, 50th anniversary edition of the *Voice*); unique plants of the Olympic Mountains, Part 1 (June, 1994), and Part 2 (December 1994); the candystick (January 1994); and herb robert, a noxious weed (October 1992).

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### **The Fisheries of Olympic National Park: Response From the National Park Service**

*by David K. Morris, Superintendent, Olympic National Park,  
responding to the state-of-the-fisheries article in the  
[Winter 2000 issue](#) of **Voice of the Wild Olympics**.*

Much of the article in the last issue of Voice describing Dick Goin's remarks to the Board accurately describes a resource in peril. However, we feel that a response is merited to present a more accurate picture of the park's actions relative to fish protection and management. We

### **Response to OPA Fisheries Article: April 25, 2001**

*by Olympic National Park  
Staff*

1. There is no doubt the fishery resources of the Olympic Peninsula as well as the rest of Washington, Oregon, California, and Idaho have declined from

especially feel that the repeated assertion that the park is "doing nothing", is an unfortunate and serious distortion.

Dick is a frequent and welcome visitor to our offices, and we've had many good discussions about his concerns, nearly all of which we share. We have been able to respond positively in some cases; in others, with conflicting pressures and lack of resources, we've fallen short. Indeed, the entire national park service, in what has been a very well documented deficiency, has long provided insufficient attention to research and resource management. Over the past 10-15 years, this has been changing for the good. That change is accelerating with the on-going implementation of the Services 100 million-dollar Natural Resource Challenge.

Space does not allow a detailed explanation of the status and trends of fish stocks in ONP. However, it should be noted that, despite serious problems in some stocks, park rivers support some of the strongest salmon stocks on the West Coast outside of Alaska. With a few notable exceptions, fishery scientists from National Marine Fishery Service consistently rate Peninsula stocks as healthy with little or not risks of extinction. And as Dick Goin may have pointed out, the numbers of Beardslee and Crescenti trout spawning in Lake Crescent this past winter were the highest observed since routine surveys were initiated in the mid-1980's.

We have long recognized our serious shortage of trained fishery professionals, as we've similarly recognized shortages in other disciplines. In recent years, and looking ahead to the near future, there is reason for optimism.

In 1999, a coastal ecologist was added to the staff to address similar problems relating to shellfish in the coastal strip as well as water quality concerns throughout the park. Another fishery biologist has been hired and will report in May. Among other duties, he will ensure park compliance with environmental protection requirements for aquatic and fish resources, identify new, improved methods of protecting roads and facilities in riparian areas, work with state and tribal managers on fish recovering efforts, and conduct inventory and monitoring surveys. A new, senior, science advisor position focusing on aquatic issues will also join the staff later in the year. This person will be working with the federal, state and tribal managers to increase our understanding of salmon ecology, especially the role of salmon in supplying nutrients to

historic levels. The decline is due to many complex factors but essentially all biologists agree the most critical factor in the decline is the loss and degradation of habitat. We can not go back to the numbers of salmon present 50 or even 30 years ago. The numbers of fish present at that time and observed by many long-term residents can not be supported by the quality of the habitat available today. Even in the Queets, where a high proportion of the watershed is in the park, most of the lower river tributaries extend outside ONP and have suffered logging and road impacts. In addition to logging impacts, everyone who has a driveway or roof over their house (more rapid runoff making winter floods worse), uses pesticides, or has ever caught a wild fish contributes to the problem. ONP is attempting to influence logging practices and development in the Peninsula's watersheds, but most of these activities are well beyond our control.

2. In addition to habitat loss, over-fishing is a problem but again almost all occurs beyond the park's control. Chinook salmon from ONP are caught in ocean fisheries from Oregon to Alaska with most of the catch occurring in Canadian waters. Up until recent years, the great majority of Olympic

aquatic environments and how that effects the numbers of spanners needed. This person will work with NPS and other agency biologists to ensure that this information is presented to the Pacific Fishery Management Council. In addition to these staff positions, the NPS is funding a Long Term Ecological Monitoring program which will provide ONP with increased funding to conduct monitoring of important, indicator species or ecosystems. While this funding will not be sufficient to monitor all the park's diverse terrestrial and aquatic systems, some portion will be utilized to monitor water quality and fish populations.

Anyone familiar with the glacial process of justifying new programs and getting additional funding and staff knows that this trend did not just happen. It represents years of internally recognizing known deficiencies in the park, setting priorities, and pursuing ways to address them.

And I would be remiss not to mention that the Elwha River Restoration project is, after the Everglades restoration work, the National Park Services most expensive, visible and ambitious resource restoration project. 75 million dollars has already been appropriated towards this effort, with 25 million presently in the 2002 budget. We hope to begin dam removal in 4 years. Above all, this is a salmon restoration project. It consumes a great deal of staff time, including a very significant portion of mine.

Lastly, its important to remember that, despite too many decisions made without adequate understanding of the resource, and priorities which will always be second guessed by those that follow us, the National Park Service remains at or near the top of the list of government agencies in terms of public esteems. The Service is admired and emulated around the world. And significantly, we continue to command huge and increasingly needed public support in this country.

In conclusion, we always welcome constructive criticism. It benefits everyone. I also welcome this opportunity to respond to what I am sure was a sincerely presented, but in our view, a regrettable one-sided expression of concern about a fishery resource that needs all the help we can collectively give it.

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## **Bush Hedges on Parks Pledge**

*by Tim McNulty*

Given the unprecedented assault on environmental

Peninsula chinook and coho salmon were caught in Canadian fisheries.

3. Almost all recreational fishing in the park is under wild-release regulations and artificial lure restrictions as opposed to state managed waters where harvest is emphasized and there are few gear restrictions. These gear restrictions are not as restrictive as some people would like but are based on reviews of the available scientific literature and not angler options that vary widely. At the same time, there is still some harvest of wild salmon and steelhead in ONP due to the fact that the Boldt Decision of 1973 applies to the park as well as other areas of western Washington. This decision requires the division of the available catch between tribal and non-tribal fisherman and if one party (tribal or non-tribal) does not catch their "share," the fish are available to the other party. This is the situation on the Queets River were the park attempted to limit non-tribal fishing and as a result, the tribe has increased their catch to compensate.

4. Differences in resource management goals between ONP, WDFW and the tribes can be resolved without court action. The National Park Service is within the Department of

protections of the early months of the Bush presidency, it is no surprise that Bush reneged on his promise for national parks.

On the campaign trail Bush vowed \$5 billion to help manage and protect the parks. In March he announced the details of his \$4.9 billion "five-year plan." The lion's share of the money goes to roads.

- \$2.7 billion dedicated to "improve and repair" roads in the parks.
- \$2.2 billion to facilities, sewers and other maintenance odds and ends.

When you cut through the smoke, this amounts to a 30% increase, or about \$100 million, for maintenance and construction projects in next year's budget. But it only adds \$20 million for protecting natural resources, the reason most parks were established in the first place.

But that's not the worst of it. About \$60 million of next year's maintenance increase comes from new appropriations. The other \$40 million is scheduled to come out of park user fees, amounting to 60% of that money. These are fees currently used at the discretion of park managers. Since they were approved in 1997, they were meant to supplement appropriations, not supplant them. In the words of the Wilderness Society's Jay Watson, this amounts to "robbing Peter to pay Paul."

Meanwhile, threats to our parks from overuse, pollution, exotic species encroachment, incompatible development, and pressures to increase motorized access continue to grow. The National Parks Conservation Association has called for a \$600 million increase to Bush's parks budget to deal with these and other serious threats to parks.

But Bush-watchers aren't expecting relief any time soon. Bush's budget proposal calls also for a \$500 million cut in the Environmental Protection Agency's funding, and \$400 million from the Interior Department's funding. Among its functions that have been hamstrung is the Fish and Wildlife Service's endangered species program.

Any gains for the environment under the current administration will have to come from Congress.

Please write your representatives in support of a \$600 million increase specifically to address

Interior and is a sister agency with the Bureau of Indian Affairs and shares its trust responsibility to ensure the tribes are guaranteed the right to harvest salmon and steelhead under the treaties. Instead of attempting to force the park's resource management goals on the tribes and the State of Washington, we are attempting to work cooperatively with the other managers and to promote additional research into the role of salmon in ecosystems, documenting important genetic differences between stocks, and examining the numbers of spawners needed to perpetuate future runs.

5. While Olympic Peninsula fish face many threats, they remain some of the strongest stocks on the West Coast of the US outside of Alaska. In reviewing the status of salmon and steelhead populations along the West Coast, fishery scientists from the National Marine Fisheries Service consistently rated Olympic Peninsula stocks as healthy with little or no risk of extinction. The exceptions were Ozette sockeye salmon where the upper portions of the watershed are not protected in the park and the decline occurred during the 1950's and 1960's (there is a

problems in our parks.

Be sure to request increases in environmental spending for other agencies as well.

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consistent pattern of decline by almost all stocks of salmon throughout Washington during this period). Bull trout have also been listed but the principal problem with this species may be a lack of information on current and historic population sizes. There have been some very positive returns to the peninsula's rivers in the last few years. For example, there were excellent returns of coho salmon to all coastal rivers in the fall of 2000. The number of coho spawning in the Hoh River last fall was the second highest return since good record keeping was initiated in the early 1970's. Another large return of coho and fall chinook is expected again in the fall of 2001. The numbers of Beardslee and Crescenti spawning at Lake Crescent this past winter were the highest observed since routine surveys were initiated in the mid-1980's. Winter steelhead fluctuate from year to year but have generally met the state and tribal goals (while the park does not necessarily agree with these goals, they are a benchmark for measuring trends). The Quileute River winter steelhead stock has been especially strong with the 1998 return being the highest number of spawners recorded since 1978 (first year in which good estimates are available).

6. Much of our fisheries restoration efforts have been focused on the Elwha River because of our ability to influence the process (one dam is in the park) and the great fishery and ecosystem benefits of this very ambitious project.

7. ONP is making progress in acquiring to staff and funds needed to address the problems facing its fisheries resources. A coastal ecologist was added to the staff to address similar problems relating to shellfish in the coastal strip as well as water quality concerns throughout the park. A new fishery biologist will be added to the staff in May who will work with the park staff to ensure compliance environmental protection requirements for aquatic and fish resources, identify new, improved methods of protecting roads and facilities in riparian areas, work with state and tribal managers on fish recovering efforts, and conduct inventory and monitoring surveys. A new science position focusing on aquatic issues will also join the staff later in the year. This person will be working with the federal, state and tribal managers to increase our understanding of salmon ecology, especially the role of salmon in supplying nutrients to aquatic environments and how that

effects the numbers of spawners needed. This person will work with NPS and other agency biologists to ensure that this information is presented to the Pacific Fishery Management Council which determines the numbers of salmon caught in the ocean. In addition to these staff positions, the NPS is funding a Long Term Ecological Monitoring program which will provide ONP with increased funding to conduct monitoring of important, indicator species or ecosystems. While this funding will not be sufficient to monitor all the park's diverse terrestrial and aquatic systems, some portion will be utilized to monitor water quality and fish populations.

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## **Elwha River Update**

*by Polly Dyer*

To continue the work necessary for ultimate removal of the Glines Canyon and Lower Elwha Dams from the Elwha River, the President's budget for the fiscal year 2001-2002 includes the required \$25,847,000.00. The next step, of course, will be appropriation of the funds by Congress. Since it is never certain that budgeted dollars will make it through Congress without change, we all should be getting in touch with our respective

Congressional representatives asking them to enact legislation to appropriate the \$25,847,000.00 for the Elwha River Restoration.

In talking with Brian Winter, Olympic National Park's representative heading up the Elwha Restoration program, it was learned that the 2001-2002 funds will:

(a) continue water mitigation measures to protect municipal (City) and industrial (Daishowa) water users, the Tribe (for their hatchery), and other water users (Dry Creek Water Association, Elwha Place Homeowners);

(b) initiate the fishery restoration work, including modifications to the Lower Elwha hatchery;

(c) initiate flood control work; and

(d) develop the final designs for removal of the dams....

The funds previously appropriated for the fiscal year 2000-2001 were primarily used for construction of water mitigation measures, protecting the City of Port Angeles water supply.

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## **Elwha Quarry Bites the Dust**

Owners of a proposed

gravel mine on the Elwha River have pulled the plug. A lawyer for Puget Sound Surfacers withdrew the company's plans in April, citing the cost of a county-required environmental impact statement. The operation would have mined 90,000 tons of rock from a 43-acre site on the Elwha River a mile from the park boundary (see *Environmental Review Begins for Proposed Elwha Quarry*, **Voice**, [Winter, 2001](#)).

OPA, along with the Elwha Klallam Tribe and the Department of the Interior, opposed the project, but some of the most rigorous opposition came from residents who live along the Elwha Road. Neighbors fought the plan for three years. They organized, signed petitions, and bird-dogged the application through the county permit process. Early this spring many placed hand-painted signs along the Elwha Road reading, "Save the Elwha River, Stop the Rock Quarry." Supporters of Elwha restoration owe them a round of thanks.

Gerry Lane, one of the owners of the quarry, told the ***Peninsula Daily News***, "I am really, really disappointed and frustrated with the system."

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## The Process of Establishment of "No Take" Zones In the Intertidal Area of the Olympic Coast

by Liam Antrim, Resource Protection Specialist, Olympic Coast National Marine Sanctuary

The Olympic Coast National Marine Sanctuary (OCNMS) was designated in 1994 as part of the federal National Marine Sanctuary System. It was recognized as an area deserving of enhanced protection and preservation as a marine wilderness because of its extraordinary beauty and rich biological diversity. OCNMS covers the continental shelf and about 220 km of shoreline from the Copalis River to Koitlah Point, approximately 4 nautical miles into the Strait of Juan de Fuca. OCNMS was established as a multiple use marine protected area, with mandates for resource protection, research, and education, and with relatively few restrictions on activities.

Existing and potential threats to the marine sanctuary resources include bottom trawling, oil spills, a growing regional population and increased visitation levels, minimal regulation of recreational harvest for some species, and disturbance to wildlife. Warning signals come from around the country and throughout the world, telling of fishery collapses and marine habitat destruction from a variety of coastal activities. Although most current impacts and threats to habitats and resources can be considered minimal, OCNMS is taking a precautionary approach to resource management by promoting appropriate protection in advance of environmental degradation.

In early 2000, OCNMS established the Marine Conservation Working Group (MCWG) to evaluate the need for more restrictive zoning for intertidal areas. The MCWG is a consensus based group with representatives from four Native American tribes with reservation lands on the outer coast (Makah, Quileute, Hoh, and Quinault), federal agencies (Olympic National Park, US Fish and Wildlife Service, National Marine Fisheries Service), state agencies (WA Department of Fish and Wildlife, WA Department of Natural Resources, WA State Parks), and representatives from commercial fishing, conservation, and the scientific community.

The focus of the MCWG was limited to the intertidal zone

Flattery Rocks.

Photograph courtesy of Olympic Coast National Marine Sanctuary.

Meetings of the MCWG are open to the public and are held monthly at various sites around the Olympic Peninsula. For information, contact Liam Antrim at 360-457-6622 x 35 (phone) or [liam.antrim@noaa.gov](mailto:liam.antrim@noaa.gov) (email).

## Marine Conservation Working Group

### Vision Statement

The Marine Conservation Working Group recommends zoning for intertidal areas of the OCNMS to conserve marine biodiversity, to sustain natural marine populations and habitats, and to foster stewardship in the OCNMS by 1) defining locations for and types of intertidal zoning that establish appropriate protective measures, including a network of fully protected intertidal reserves, 2) researching the effects of intertidal zoning, 3) establishing areas for research and for monitoring long term trends in intertidal zones, and 4)

for several reasons. The habitats and biological communities are well characterized. Intertidal zoning was considered a feasible task given the sanctuary's financial and staffing resources. Moreover, both the Olympic National Park and OCNMS have similar mandates and overlapping jurisdiction of intertidal areas.

To date, the MCWG has hosted a series of technical and policy seminars to review coastal ecology, resource management, and marine protected area science. This process helped the group identify why (vision statement), what (goals), and where (site selection) additional zoning should be considered. The MCWG also identified a number of issues potentially confounding the process, including tribal harvest issues, multiple layers of jurisdiction and ownership, recreational fisheries, and heavy use of the shoreline by coastal hikers.

Whereas the MCWG is considering both the ecological benefits and management implications of a range of zoning options, a significant component of its recommendations are likely to be a network of no-take marine reserves, a series of sites where no extractive activity will be allowed. The MCWG drew upon regional expertise to host a technical advisory panel (TAP) that was tasked with recommending specific sites for no-take marine reserve designation based on ecological criteria, explicitly disregarding legal, management, and jurisdictional issues. The TAP based their site selection on habitat data, local knowledge of the shoreline, expertise in marine conservation and marine reserves, and knowledge of larval distribution and species life histories. Their recommendations included high, moderate, and low priority sites for inclusion in a network of no-take reserves encompassing between 20% to 40% of the sanctuary shoreline.

The MCWG will use the TAP's recommendations as a basemap on which management and jurisdictional issues can be superimposed to develop a more comprehensive scheme for intertidal zoning. In the fall of 2001, zoning recommendations will be presented to the Sanctuary Advisory Council and OCNMS for further consideration. As zoning recommendations become better defined, OCNMS anticipates increased public outreach in the form of presentations to local organizations and agencies and public forums.

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educating the public about marine conservation.

### **Goals**

The overarching goal is to protect the biological diversity of the intertidal ecosystem.

### **Additional goals are:**

1. To protect a variety of representative habitats and associated species.
2. To consider the conservation needs of special groups of organisms, such as species with complex life histories and keystone species, and unique habitats.
3. To preserve and protect the cultural, aesthetic, and historic resources.
4. To preserve the cultural uses and resources of indigenous peoples.
5. To encourage education and interpretive activities at appropriate sites, while minimizing human disturbance.
6. To foster a stewardship ethic so that people can understand and experience the value of habitat management and conservation practices for marine wilderness areas.
7. To provide reference and research sites for analysis of ecosystem changes over time.

8. To provide sustainable populations of harvested species, while minimizing economic disruption to stakeholders.

9. To provide tools for evaluating the effectiveness of management policies and practices.

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