

Puget Sound Crab Association

“CRABBING SUCCESSFULLY AND PROTECTING THE RESOURCE FOR FUTURE GENERATIONS”

Dear Commission Members

I am writing you today to bring to your attention some of the shortfalls or discrepancies in the presentation on policy C-3609 Dungeness Crab Fishing in Puget Sound that was given by Rich Childers on Friday February 3, 2012.

1. First I would like to address the Commercial earnings that were represented at some \$10 million dollars; this might be a close representation of the revenues this year but let's be clear that this is due expressly to the high demand and record prices paid for Dungeness crab this season. There was also a non typical high abundance of crabs this season which promotes a false sense of success in changing the policy. Had it not been for the escalated market price and high abundance we would most certainly seen a dramatic decline in revenues. Our seasons are always dependant on several influences such as market price, bait and fuel costs, insurance, crew and largely crab abundance. The average crabber can anticipate roughly how he will operates in a given season with the anticipation of these things, but with the current volatility of the recreational catch and the lack of good information available to us prior to the season there is no way for us to plan our business strategy. We still feel that the recreational fishery needs to have an allocation of the state share and not unlimited access as you have given them in the new policy. The growth rate of the recreational fishery is certain to outgrow the resource availability and the commercial component is sure to be eliminated in this current approach.
2. There was some discussion over the soft shell issue and whether or not the opening date for the recreational fishery of July 1st was a good date. While Mr. Childers reported that the state felt through their research that this was still a viable date, we know for certain that the biologists under his direction were on tribal vessels prior to the tribal opening (that will ALWAYS be prior to recreational) and that the crab were indeed not at the 80% hard shell condition required for season openings. However, the tribes were pressured by the FIXED published recreational opening of July 1st. As with many other things in the fishery, change is certain and we as commercial fishers can attest to this better than any. In talking with most of the buyers of commercially bought Dungeness crabs for Puget Sound it was widely expressed that the crabs were indeed not ready and that there was an abundance of soft shell crabs being delivered. This could all be rectified by postponing the recreational opening date to the 15th of July the same as the northern regions. This would also cut down on the influx of recreational fishers from the northern regions to the southern regions and help reduce overharvesting in those areas.
3. There was also discussion of the 211,880 pound discrepancy in the recreational summer harvest. It was presented in a fashion to lead you to believe that after the fact the tribes and the state sat down and came up with another way to run the calculation for the estimates associated with the non-reporters. That was not the way it happened, the state did indeed sit down with the tribes and develop a new formula for the estimate but it was the state's error in a failure to use the new agreed upon formula. The tribes caught the error (to late) and requested the state to recalculate the recreational summer harvest numbers with the appropriate bias correction. It was also said by Mr. Childers that the bulk of the 211,880 pounds were taken in Hoods Canal, when in fact only 37,172 pounds of the overage were from Hoods Canal. However 154,910 pounds were harvested in areas that the commercial fleet had access to resulting in the overnight loss of some \$619,640.00 in revenue to the commercial fleet. I have attached data sheets that

PO BOX 151
ANACORTES, WA 98221-0151
360-929-3596

breakdown the distribution of the new summer harvest number, keeping in mind none of the data reported by Childers or displayed in the attached data sheets includes actual hard reporting data from the recreational winter season that closed December 31st 2011. Try to imagine yourselves trying to manage your business with these kinds of discrepancies and lack of good timely data.

4. In Mr. Childers' report he talked about how well the new outreach program was working and how the compliance with reporting has improved over the last several years, however, I find it ironic that in the first year of the so called outreach and education program after spending tens of thousands of dollars on brochures, calipers, weather proof cards and traveling around the state talking to newspaper reporters educating the public along with a \$10.00 penalty for not reporting, that the increase in reporting was a meager 1% when in years prior to these efforts the CRC return compliance growth rate was between 4% & 13%. It is apparent to me that the revenues the state has spent on the outreach and education program would have been better served in enforcement as nothing is more educational than a citation. The claim that violations by recreational fishers is reduced is shown in Childers numbers but the rate of compliance there is only from 1% to 3% better, one must ask themselves if that is simply due to enforcement being instructed to give more verbal warnings as opposed to written citations in an effort to show better compliance.
5. Lastly, it was disconcerting to us when posed with the question of which user group Tribes, State Commercial or State Recreational were responsible for the highest percent of violations or non-compliance, that both Mr. Childers and Deputy Chief Cenci were reluctant to give a direct definitive answer when it was clear in the report that they had just given that the recreational fishery by far has more violations and are the most non compliant group. It was realistic for Deputy Chief Cenci to divert from the tribal numbers due to his lack of direct contact with that group of fishers but there was no reason to divert from the others where the answer is so clear. When we questioned Deputy Chief Cenci on this after the meeting he eluded to the fact that the Commission was aware of what the numbers were. Our only conclusion is that their reluctance to put this information on the public record is from fear of confrontation from the recreational sector.

Professionally

Brian E. Allison 360-929-3596

brianeallison@comcast.net

Puget Sound Crab Association (President)

PO BOX 151
ANACORTES, WA 98221-0151
360-929-3596

Recreational summer catch numbers in pounds (Winter catch data not available yet)				
Marine areas	Catch Region	Original estimate	New estimate	Difference
7	1	488,094	520,683	32,589
8-1 & 8-2	2E	868,834	978,215	109,381
9 (non 25 C) included in 3-2	2W 3-1	118,129	122,665	4,536
6	3-2	117,493	125,281	7,788
4 and 5	3-3	8,278	8,894	616
10	4	129,175	145,630	16,455
9 (25C) & 12	5	289,197	326,369	37,172
11 & 13	6	128,261	131,604	3,343

Totals	2,147,461	2,359,341	211,880
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Total pounds in areas where the commercial fleet has access. 154,910

Loss to the commercial fleet based on an average price of \$4.00 per pound for the 2011/2012 season due to a simple key stroke error. \$619,640.00

We have recently received the data from the state on the discrepancy of poundage from the 2011 recreational summer catch numbers, the original numbers listed above were what we were basing our management decisions on and was provided in early November. The new estimate is based on the latest information that the state put together after the tribes made them aware that the state statistician (Eric Craig) had used the incorrect bias number for the recreational extrapolations for non reporters of which the return rate was approx 52%. As you can see the total difference is some 211,880 pounds with a net result of an additional 154,910 pounds of lost opportunity to the Commercial Fleet.

Brian E. Allison 360-929-3596
brianeallison@comcast.net
 Puget Sound Crab Association (President)

Recreational Growth for 2011 Summer season excluding unavailable winter catch data

	2006	2007	2008	2009	2010	last 2 year average	last 5 year average	2011	2011 growth over last	2011 growth over 2 yr average	2011 growth over 5 yr average
Region 1	374,653	433,762	464,857	511,671	567,428	539,550	470,474	520,683	-8.24%	-3.50%	10.67%
Region 2E	423,451	355,396	504,500	524,380	585,026	554,703	478,551	978,215	67.21%	76.35%	104.41%
Region 2W	39,754	41,701	62,479	66,585	85,904	76,245	59,285	122,665	42.79%	60.88%	106.91%
Region 3-1											
Region 3-2	70,771	62,129	69,936	99,134	102,375	100,755	80,869	125,281	22.37%	24.34%	54.92%
Region 3-3	39,755	22,850	31,550	13,674	10,865	12,270	23,739	8,894	-18.14%	-27.51%	-62.53%

Totals 948,384 915,838 1,133,322 1,215,444 1,351,598 1,283,521 1,112,917 1,755,738

Total average Growth

26.11%	42.88%
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Estimated Loss in revenue to the Commercial fleet based on a \$4.00 per pound average for the 2011/2012 season excluding winter recreational harvest estimates.

\$1,888,868.00	\$2,571,283.20
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Estimated loss of revenue to commercial fishers on a per permit basis with the winter recreational season not yet accounted for, and this is just the first season of the new policy.

\$7,585.82	\$10,326.44
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Note: See data sheet entitled **Recreational summer catch numbers in pounds** for camparrison of recreational catch areas and Commercial catch Regions

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brianeallison@comcast.net

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