

# **Puget Sound Crab Association**

*“Crabbing Successfully and Protecting the Resource for over 70 years”*

**Brian Allison: Puget Sound Crab Association (President)**

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**April 09 2016 WDFW Commission Meeting**

# Why Are We Here?

- Provide insight from the Commercial perspective on the revised policy c-3609
- Seek assurances that there is a future for a non treaty commercial Crab Fishery in Puget Sound in all areas currently fished by the non treaty Commercial fleet.
- Request modest modifications to the policy that will insure adequate commercial opportunity in all areas currently fished by the commercial fleet.
- Fear that regions 2E, 2W and 3-2 will be consumed by the recreational fleet as has happened in south sound, leaving only region 1 and remaining portions of region 3 for commercial opportunity.

# Preserve, Protect and Perpetuate

- Statute **RCW 77.04.012. Mandate of Department and Commission**
- Wildlife, fish, and shellfish are the property of the state. The commission, director, and the department shall preserve, protect, perpetuate, and manage the wildlife and food fish, game fish, and shellfish in state waters and offshore waters.
- The department shall conserve the wildlife and food fish, game fish, and shellfish resources in a manner that does not impair the resource. In a manner consistent with this goal, the department shall seek to maintain the economic well-being and stability of the fishing industry in the state. The Department shall promote orderly fisheries and shall enhance and improve **recreational and commercial fisheries.**



# Protection and Sharing of the Resource

- We ALL need to be involved in the protection of the resource.
- We need fair sharing of the resource to provide reasonable opportunity for ALL user groups.
- Sustainability of the resource is key to provide access to the consumer.
- Future generations are depending on us.
- The Commercial Industry has always had a conservation first Policy to protect the future of the resource. We were responsible for proposing Bio-degradable rot chords as well as escape ring size increase and catch record cards.

# The Recreational Sector



# Conservation of the Resource

- In 2010 when the policy was revised, the commission majority advocated to give expanded opportunity to recreational fishers before insuring compliance was met.
- It was the understanding that WDFW and stakeholder groups would “clean up” the high rate of violations, unreported catch, and facilitate accurate accounting and higher CRC returns.
- It is apparent now 5 years later, that there was and still is a lack of incentive on the part of the recreational fishers to comply.
- The shortfall of these inadequacies has created much tension between State and Tribal Co-Managers, in the form of EUC (Estimated Unreported Catch) by the recreational fishers. The 2015 EUC was over 74,000 pounds in areas where the commercial fleet fish.
- These indiscretions by the recreational fleet are later deducted from allocation earmarked for the commercial fleet. In turn this has cost the Commercial fishery, loss of fishing time and abundance opportunities.



# Conservation of the Resource

- Without compliance of the 3s system (Size, Sex and Season) and the continued growth of the recreational fleet to over 240,000 participants of which on average 30% annually are new to the fishery, the threat to the resource is greater than ever.
- With all of the time, money and resources that WDFW and other Stakeholders have put into the Education and Outreach of the recreational fishery the results have had limited success.
- CRC returns are a basic flat line from 2010 to present, even with the \$10.00 penalty for non reporting, with the exception of the winter fishery! Which is primarily due to separating the summer and winter CRC's when purchasing a Crab endorsement.
- Enforcement contacts both on the water and dockside yielded the same results. "Little to no increase in compliance."

# Where do we draw the line between Recreational and Commercial?

- Currently unrestricted opportunity allows a person to harvest 250 crabs in the 50 day summer season and potentially another 450 crabs in the winter season.
- One might wonder if this is truly a recreational fishery. This is based on only 1 family member participating, but we hear time and time again what a great family activity it is.
- What is a reasonable number of crabs for one person to harvest in a season? 25, 40, 75, 100. Implement a seasonal bag limit to eliminate abuse of the resource.



# Where do we draw the line between Recreational and Commercial?

- In the 2015 season there were 4796 recreational fishers that reported catching over 40 crabs ,933 that caught over 75 and 247 that caught 100 or more. These are only from cards that were reported.
- How many crabs can a person eat?
- What exactly represents a Quality recreational experience?
- Feeding the neighborhood is the job and livelihood of the commercial fisher. **Not the recreational sportsman.**

# Upcoming Immediate Concerns

- Increasing participation in regions 2E , 2W and 3-2 along with un-harvested available crabs from last season, due to the lack of cooperation from Treaty Tribes spells disaster in the form of excessive harvest by recreational fishers.
- We can not emphasize enough just how pivotal region 2 is to the well being and success of the Commercial fishery.
- The inability of WDFW managers to get recreational catch data in a timely manner, makes it increasingly difficult for the commercial fleet to prepare for the season.
- This last season it was only 6 or 7 days before the season opening that we knew whether we would even have a fishery in region 2.

# Commercial Catch Area 2 East

Also represented as

## Recreational catch areas 8-1 and 8-2 for Dungeness Crab

2015 Recreational Summer catch in Pounds	Number of days fished	Average Pounds per day Landed	Average weight of crabs Caught in pounds	Minimum Number of Crabs caught per day	Minimum Number of 5 crabs per day limits caught every single day
<b>1,005,163</b>	<b>50</b>	<b>20,103.26</b>	<b>1.8</b>	<b>11,168.48</b>	<b>2,233.70</b>

Using the estimate that only 2/3rds of crabs harvested are by boat! This would represent the number of anglers on boats each catching 5 crabs per day

then using the assumption that there would be an average of 3 anglers per boat this would represent the minimum number of boats on the water every single day

This number would then represent the remaining 1/3rd of anglers fishing from docks and shore which is likely over estimated

<b>1488</b>	<b>496</b>	<b>746</b>
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# 2015 Offload Site Survey

- Goal: Collect CRC compliance data after crabbing trips are completed;
- Site surveys were conducted systematically throughout the summer season (July 1 to Sept 7);
- Both weekday and weekend visits were attempted;
- 28 survey locations
- 136 site surveys conducted
- **1,191** crabbers were interviewed
- **5,061** crabs were measured
- **Average crabs per angler = 4.25**



# WDFW Enforcement Crab Rule Compliance Emphasis Patrols



- 44 officers involved in summer 2015 emphasis
- Primarily (83%) on the water contacts



	2012	2013	2014	2015
Fishers Contacted	3,814	3,494	4,809	<b>3,659</b>
Number of Crab checked	5,864	4,013	5,952	<b>6,717</b>

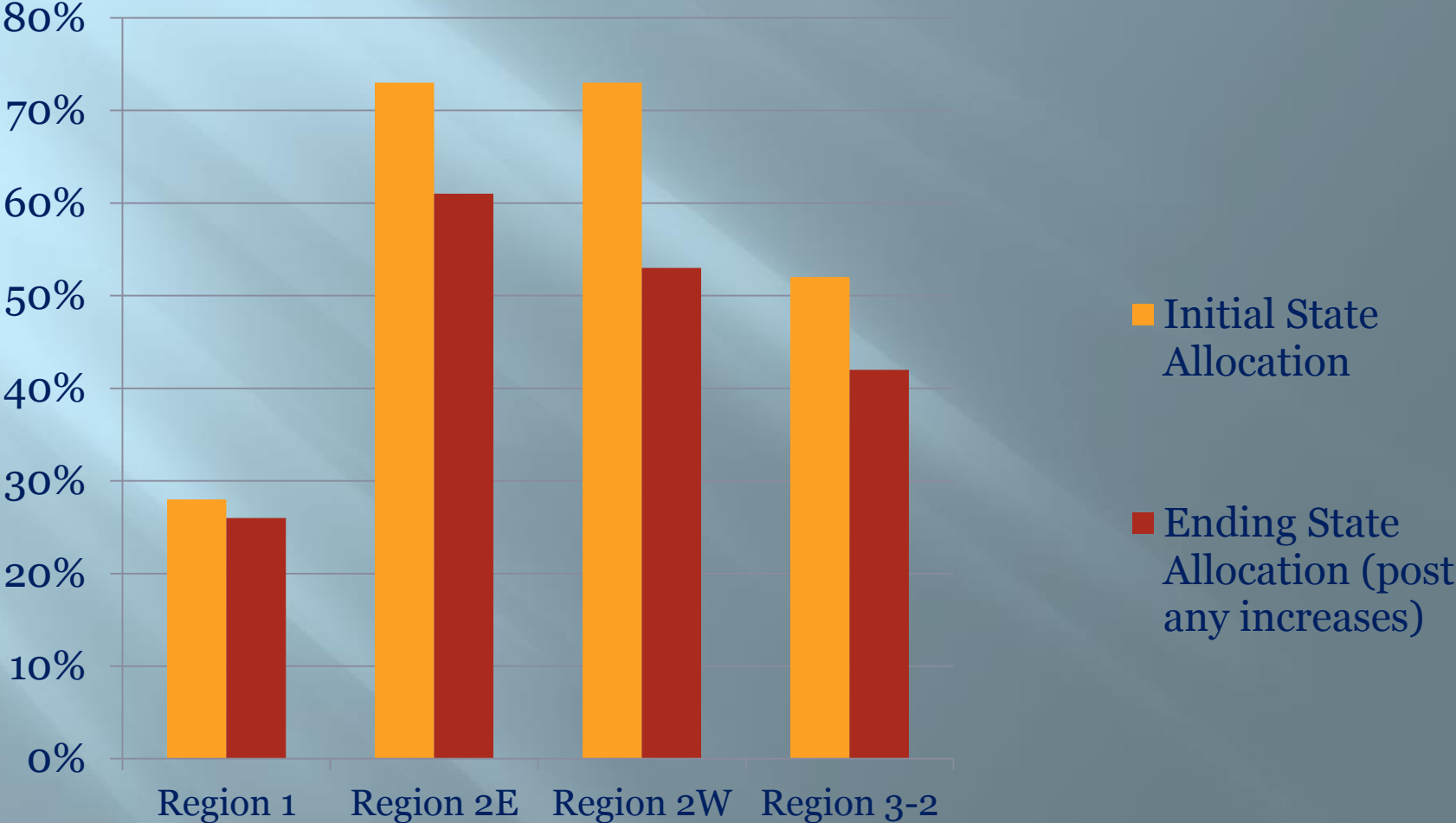
**Average Crabs per Angler = 1.8**

# Catch Data Observations

- If indeed the harvest numbers were at an all-time high in region 2E. Would the data from the dock side and emphasis patrols not be more conclusive?
- It is evident from the patrol contacts, that not all fishers are catching a full 5 crab limit. We must assume that there were considerably more than just the 2233 fishers every day that it took to land the 20,000 pounds per day.
- If we were to simply to take an average of the crabs counted by dock side and patrol contacts, that number would be over 3,700 anglers per day.
- It is increasingly difficult to believe this is really taking place.

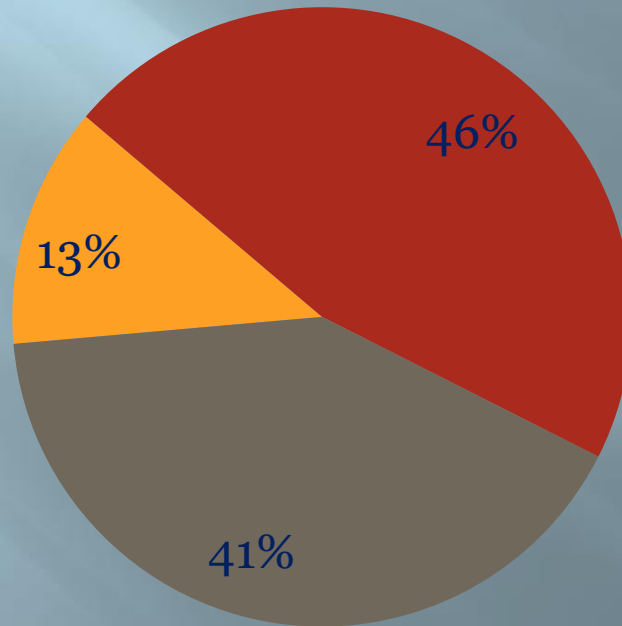


# 5 year average of the recreational share based on State Allocation



# Catch Record Card reporting

## 2015 CRC Reporting



■ CRC returned by mail   ■ Internet reporting   ■ Non-respondents

# How is the recreational crab harvest counted?

- After an average 50 Day Summer season the recreational fisher is given opportunity to either access an internet portal to report their catch or to return their CRC by US Mail.
- There is a 30 day grace period associated with this return.
- The only penalty for non reporting is implemented the following year and only if the fisher wants to acquire a new Crab Endorsement. The penalty is \$10.00
- After a full 90 Day winter Fishery the process is repeated.
- In a multi stage process, WDFW has a statistician assimilate the reported data then create a mathematical equation to PREDICT the remaining catch from the non-respondent fishers.



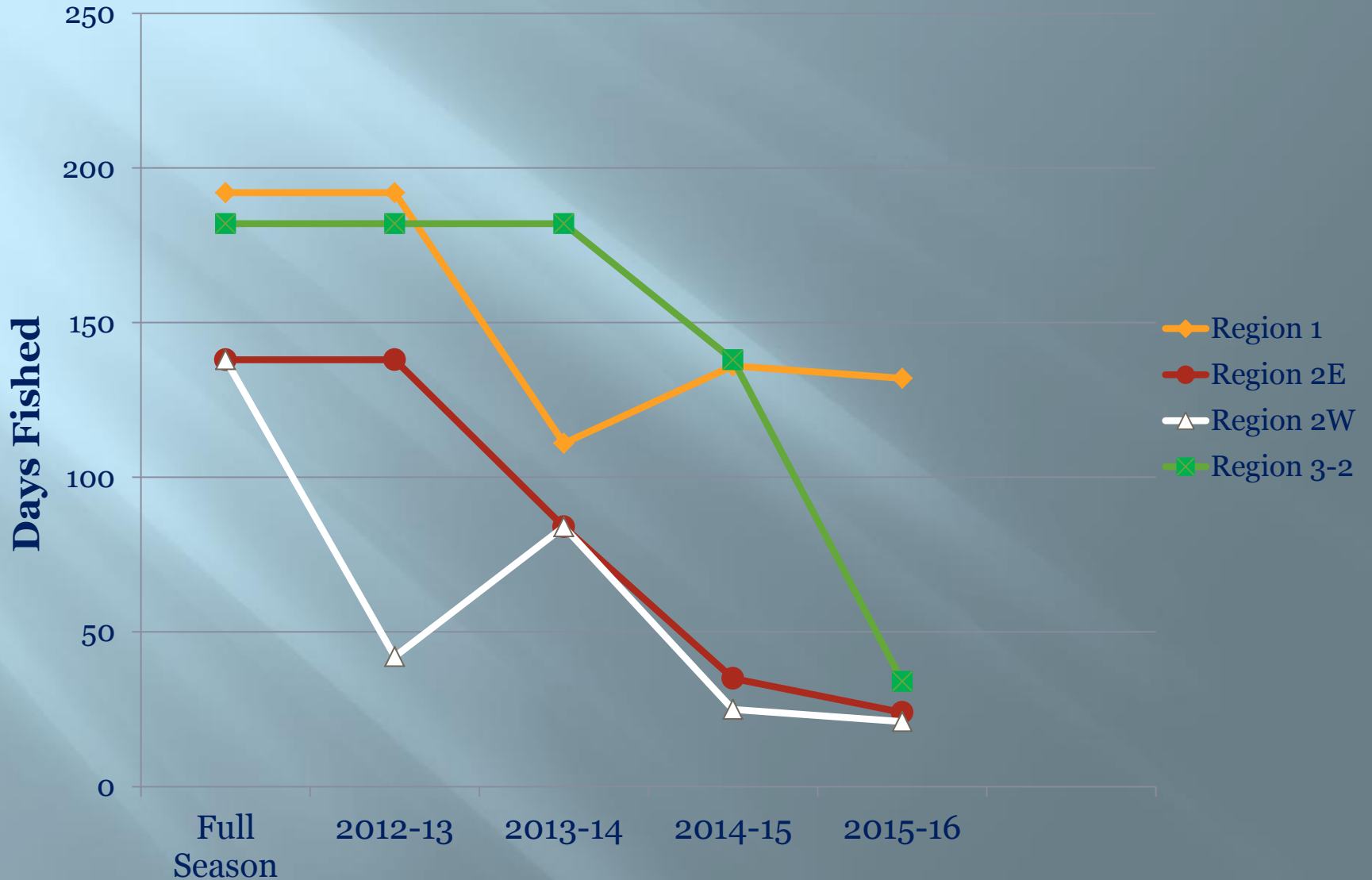
# Access to the resource

- Of the 6.6 million residents of Washington State 243,043 purchased recreational crab endorsements for Puget Sound and harvested 2,767,970 pounds which represents 47.2% of the state share of the Puget Sound Dungeness Crab resource in 2015.
- The Remaining 6.3 million who potentially buy or eat crab rely primarily on the Puget Sound Commercial crab industry, largely from October thru December when there is no other fishery taking place.
- It has been posed by some that the Tribal fishers can fill this void.
- It is unreasonable to preclude that the only participation level for a non treaty fisher should be recreational.

# The Commercial Sector



# Reduced Commercial fishing days

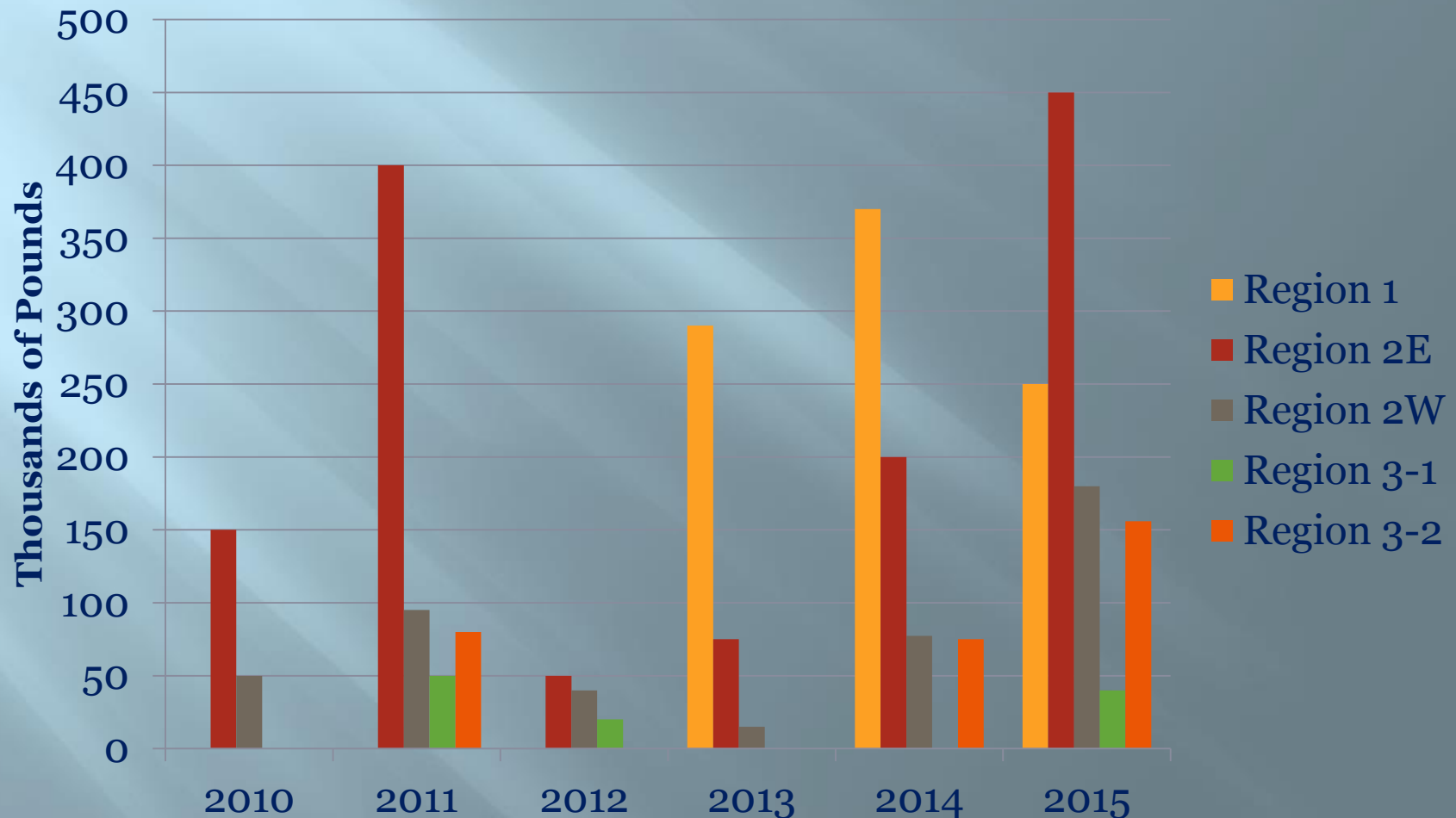


# The Abundance Increase Component

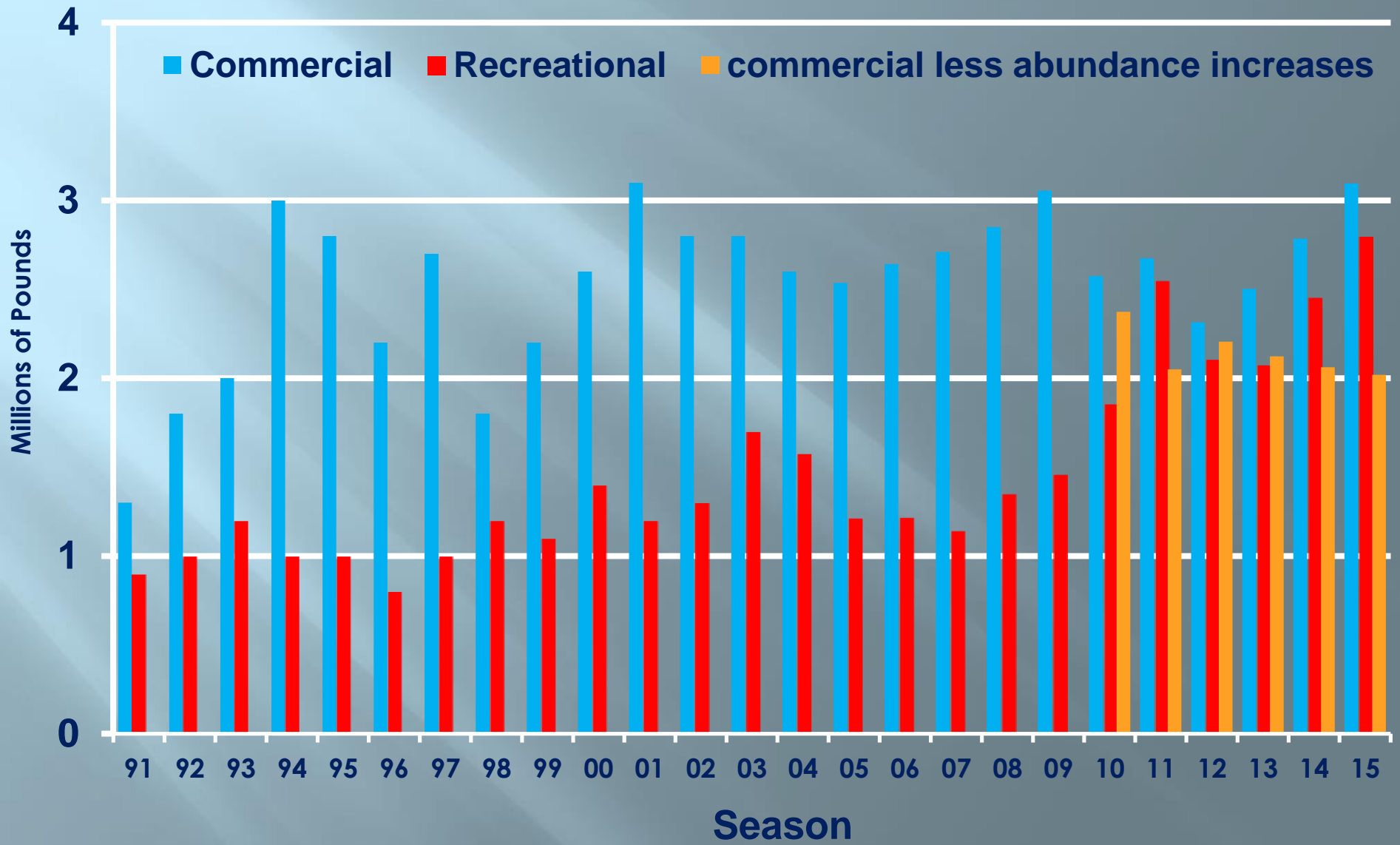
- State and Tribal co-managers must agree that there is abundant resource that will sustain additional harvest.
- As State Commercial Fishers we are quite literally at the mercy of the Tribal co-managers for any additional abundance or fishing time.
- There is absolutely no Assurance there will be any increases in any given year.



# Volatility of Abundance increases over the last Six years

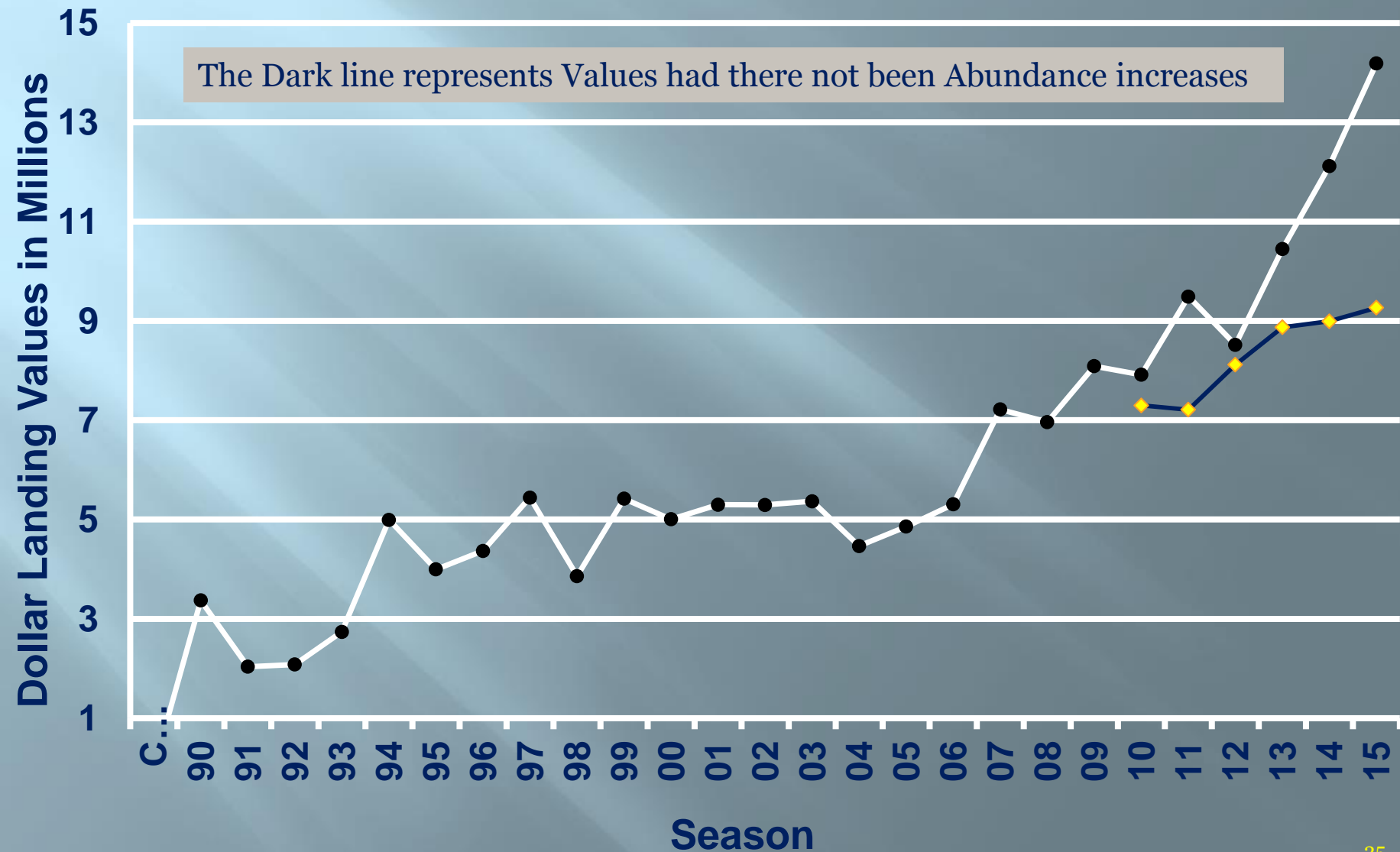


# Dungeness Crab Harvest for State Fisheries in Puget Sound (1991-2015)



# Total Adjusted Ex-Vessel Landing Values for the Puget Sound State Commercial Crab Fishery (1990-2015)

Ex-vessel values were adjusted to 2015 dollars using a Consumer Price Index (CPI) conversion maintained by the United States Department of Labor Statistic



# Ex-Vessel Value breakdown 2015 Season

- 14.19 Million dollars ex vessel value.
- Divided between 249 licenses = \$56,987 per license.
- Less expenses:
  - Licensing, Buoy Tags, Bait, Crew, Fuel, Insurance, Moorage, Gear, Gear loss, Boat Payments, Permit Lease Etc.
  - Estimated Expenses:\$15,000 to \$30,000 per license depending on whether permit is leased or owned.
- Based on current Permit values of \$165,000 to \$170,000 and Lease prices from \$15,000 to \$17,000. Is it unrealistic to say that the per permit earnings are well within the average for the capital investment incurred?



# Future generations

- With shortened seasons and uncertainty of an actual set aside commercial opportunity in the form of a guaranteed percentage of the resource. It's difficult for younger fishers to justify the expense of breaking into the fishery. Shorter seasons have created the need for greater pot restrictions which results in the need to have multiple permits to make a viable income.
- The fishery has become highly competitive due to limited available resource and increased gear restrictions. This pushed us to implement additional permit stacking to three permits per vessel, which has created an escalated market price for licenses in an effort to maintain viability in our businesses.
- This upturn in permit pricing contributes to the lack of ability for younger fishers to break into the fishery. Current permit prices range in the \$170,000 market, and \$15,000 to \$17,000 for a lease opportunity.
- While we understand it is neither the commissions concern nor responsibility to entertain arguments of heritage, or generational businesses, it is however worth mentioning that it was that very argument that insured the Treaty Tribes 50% of all fishing resources in Washington State.

# Problem Areas

- Regions 2E, 2W, and more recently 3-2 are in jeopardy of being completely harvested by the recreational sector, leaving no Commercial opportunity.
- The onset of this has already lead to shortened seasons mentioned earlier, which leads to commercial overcrowding in remaining areas where allocation remains. This in turn reduces fishing time in those areas as well.
- The fact is, the commercial fishery is managed in a reactionary manner as opposed to a more stable calculated plan.
- We are last in line so management has no choice but to react to how much the recreational fishers caught, and then to what the Tribes will agree to regarding any future abundance increases.
- These are the results of an open ended recreational Priority fishery.

# Policy Modification Request

- Removal of (in Priority order) from the policy language, this phrase only breeds contempt and misrepresents the general policy statement as it states the resource is to be shared fairly, there should be no language that prioritizes one group over another.
- Place percentage based shares by region on the harvest of the recreational fleet that will still allow for a quality recreational opportunity but also gives commercial fishers opportunity for a viable harvest in all areas currently fished and reduce overcrowding.
- “Handout provided” proposed percentages, These are essentially an average of the most recent 5 years.
- Change language in regions 4,5 and 6 to **primary** instead of **exclusive** use for recreational fishers to give WDFW leverage to harvest crabs to meet equity with tribes. Perfect example leaving 117,000 pounds in region 5 that recreational fishers could not harvest even with an extended harvest window of two months just this past 2015 season.

# Proposed Solutions

- Implement a seasonal bag limit for Recreational fishers.
- Implement a catch and release program! It seems to have great appeal in a variety of other Recreational fisheries. Remember the intent is to recreate and have fun not just see how many crabs you can catch in a given season.
- Reduce the number of pots allowed per vessel like in the Prawn Fishery, 2 per person 4 per vessel. This could help with the derelict crab pot program as well.
- Regulate the recreational fishery in a pulse fishery giving time in between to collect CRC data. Now that regulations are online and not in a cut and dried pamphlet it may give WDFW opportunity to get a better feel for what is being caught and manage accordingly.



# Proposed Solutions

- Increase endorsement fees by \$1.00 to generate capital to implement and maintain IOS and Android Applications for real time reporting on your smart phone.
- Open the online portal when the season opens to allow for early reporting. WDFW data shows the majority of participants only make a single trip, why must they wait 6 to 10 weeks to report? Report it when its fresh in the mind instead of waiting to misplace or loose it.
- Take more effective and aggressive steps to bring recreational fishers into compliance with all rules and regulations. Make the penalty for non reporting a significant \$\$ amount or even or even revoke access the following season. It is evident the \$10.00 fee is ineffective.

# We Encourage your Questions

