



August 2, 2010

Washington Fish and Wildlife Commission  
600 Capitol Way N.  
Olympia, WA 98501

Dear Commissioners,

We are writing to express our strong support for restoring equity and common sense to the management of Puget Sound Dungeness crab. We believe this requires a policy change that gives priority and meaningful opportunity to Puget Sound recreational crabbers. This change is long overdue and is clearly in the interest of the Department, the State and fairness for over a quarter-million recreational users.

Puget Sound recreational crabbers face increasing frustrations posed by the current inequity in harvest share and insufficient opportunity. As you may know, a handful of commercial interests take two-thirds of the Puget Sound crab harvest and nearly 90% of the total state harvest when coastal catches are included.

Washington citizens once enjoyed a meaningful, year-round recreational Dungeness crab fishery in Puget Sound. This changed abruptly in 1995 when the Department limited the Puget Sound recreational allocation to a mere one-third of the state harvest. This arbitrary decision, taken at a time of dynamic growth in the sport crab fishery, has led to significant reductions in fishing opportunity for recreational fishers.

Puget Sound is ideal for recreational crabbing due to its relatively sheltered waters and close proximity to over 65% of the state's population. The 236,000 Puget Sound crab endorsements sold in 2009 provide solid confirmation that citizens value this fishery highly. The crab endorsement together with the annual recreational shellfish license generated over \$3.4 million in funding for the Department's management and resource stewardship programs in 2009. These revenues dwarf the \$65,000 in

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license fees generated annually by the Puget Sound's 250 commercial crabbers. Even when adding an estimated \$132,000 to account for the excise taxes on commercial shellfish landings the revenue generated from recreational crabbers is 17 times greater than from the commercial fishery.

As the Department grapples with diminishing support from the state General Fund it must focus on maintaining and increasing this fee revenue from recreational users. It will not succeed by asking recreational fishers to pay more and yet make do with less opportunity.

Prioritizing and enhancing the Puget Sound recreational crab fishery would also profoundly benefit our economy during this difficult time. According to the 2008 analysis prepared for the Governor and the Commission the recreational crab fishery generates 12 times more value to the state per crab than the commercial fishery.

Even if the Department were to prioritize and enhance the Puget Sound recreational crab fishery, local crab consumers would experience little or no decrease in availability of Dungeness crab. This is because commercial crabbers will continue to dominate the coastal harvest with an average take of 9 million pounds annually. This is double the total state Puget Sound harvest. Moreover, the treaty tribes also make much of their 50% share of crab harvests commercially available to consumers as well.

We appreciate this opportunity to comment on this important issue. We respectfully urge the Commission to adopt Alternative A, although we encourage you to avoid a one-size-fits-all approach to managing the recreational crab fishery across all the marine areas. This may serve to prevent the prioritization of the recreational crab fishery in Puget Sound which we feel is greatly needed and long overdue.

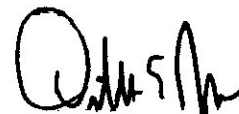
Sincerely,



Bryan Irwin  
Regional Executive Director  
CCA Washington



Ron Garner  
State Board President  
Puget Sound Anglers



Dwight Jones  
President  
Fish Northwest

Cc: Governor Christine Gregoire  
Phil Anderson, WDFW Director