

1/28/2013

Washington Fish and Wildlife Commission:

Comments in opposition to rule change #63 (increasing bag limit from 80 to 200 prawns per person in the Ocean Spot Prawn Fishery)

My name is Larry Thevik. I am a lifetime resident of Washington State and have been a coastal commercial fisher for over forty years. I am a member of the State appointed Coastal Crab advisory board and a one of three State appointed members to the Tri-State Crab Committee functioning under the sanction of the Pacific States Fisheries Commission.

I have been a coastal spot prawn pot fisher since 1993. I am one of only nine licensed spot prawn fishers the entire length of the Washington coast. This fishery is very limited in participation, limited in scope and is limited in abundance. This fishery has only recently become a limited entry fishery after many years of emerging fishery status. The present fishery has regional quotas and an overall quota. At this time there exists little if any tribal participation in this fishery but the tribes could exercise their presumed rights at any time and our non-treaty quota could be cut in half at any time thereafter. The State negotiates management agreements with Tribes prior to the opening of our non-treaty spot prawn seasons.

In all of the years, (I was one of the first fishers to target Coastal Spot Prawns), I have yet to observe a recreational ocean Spot Prawn fisher or his/her pots. At this time the State has no record of any recreational Spot Prawn Catches off of the Washington Coast. If there have been any recreational coastal catches to date they have not been reported. It is my contention that the lack of recreational activity is not because of the bag limit but because of the nature of the fishery. Most of the known Prawn grounds are in distant waters, (20-40 miles offshore), in deep water --generally 600 feet or more, in water where ocean and tide currents are often strong, and a where a fisher is a long ways from safe harbor when the weather turns against him.

I believe the Departments recommended rule change demonstrates a fundamental failure by recommending Staff to recognize the stark difference between our coastal ocean Spot Prawn fishery and the Prawn fisheries occurring in "inside waters" both in Washington and the "inside passage" to Alaska. Fishing fixed gear from most recreational vessels 30 miles from shore is not always a safe activity. As a long time commercial fisher I am not opposed to a recreational fishery targeting the same species as I. But I am opposed to what I feel is a misguided attempt to try to "promote" a fundamentally "un-promotable" fishery, ("lip stick on a pig"). Little if any benefit will accrue to the fishery, few if any fishers will directly benefit. If more fishers fish gear conflicts will increase, more pots will be "lost", monitoring problems will increase, quota issues will arise, and potentially more fishers with little experience, and marginal equipment will be enticed to enter a fishery they may not survive. All commercial fishing vessels are required to undergo an extensive safety exam, have required safety equipment, (including a life raft), and safety training before operating beyond three mile from shore. There are very few requirements for recreational vessels. To implement a rule that is intended to "sweeten the pot" to lure the inexperienced and often poorly equipped to venture further out to sea is not good policy.

One of the rationales driving this recommended increased bag limit appears to be the mitigation of an expected increase cost to fishers to pursue a recreational experience catching spot prawns in the ocean. Frankly, most recreational experiences are not expected to be cost effective or revenue neutral. We generally pay for our recreational experiences. Movies, skiing, travel, art, theater, restaurants, music, hobbies, and sports-- all require expenditures. To expect hunting or fishing recreational experiences should somehow pay their own way is absurd. Bag limits for recreational fishing are not tied to the cost of that activity they are tied to the needs of a manageable, sustainable, and shared access to limited resources. To increase a bag limit to accommodate increased expenses by a recreational fisher should have little weight in fisheries management. The amount of Spot Prawns allowed under this new rule would elevate the value of a recreational days catch to levels comparable to some commercial catches. Five fishers on one vessel each keeping 200 prawns has a catch value of approximately \$1,000 on today's market. Is this for recreation or for subsistence and profit?

Those of us who fish commercially for prawns already have a crowding problem with our gear. We fish pots on long lines with buoys marking each end. We generally communicate with one another to ensure we do not tangle each other. The strings are generally ½ mile long with 50-70 pots on each line. Prawns are very area sensitive and the spots are few and generally small. If we encourage more fishing in the same spots more gear will tangle especially if a recreational fisher new to the "scene" does not understand the "lay" of the commercial gear. One of the troubles we all want to avoid is to tangle with other gear; it is very difficult to lift that much gear at once. When we do tangle we often have to cut and retie the other fisher's gear-- this is dangerous-- it would be more dangerous for a small boat to lift let alone separate successfully. If the gear cannot be separated it may need to be cut and could result in a lost pile of gear. Believe me you do not appreciate this difficulty unless you experience it. Add a rolling sea and wind it is next to impossible.

I fail to understand the need, efficacy, or justification for rule change #63. I am not trying to stop a recreational fisher from attempting to catch Spot Prawns in the Ocean but I do believe this rule could encourage Prawn fishing in the ocean for the wrong reasons with likely very poor and perhaps dangerous results. I am requesting the Commission examine this rule change more closely disregard the Departments recommended change and maintain the Status Quo.

Rule change #63 increasing the Bag limit of coastal Spot Prawns is ill-conceived, ill-advised, seems based on a faulty premise, and includes the potential of several negative unintended consequences.

Respectfully,

Larry Thevik F/V Midnight Star