

Or. Border

Klamath Control Zone

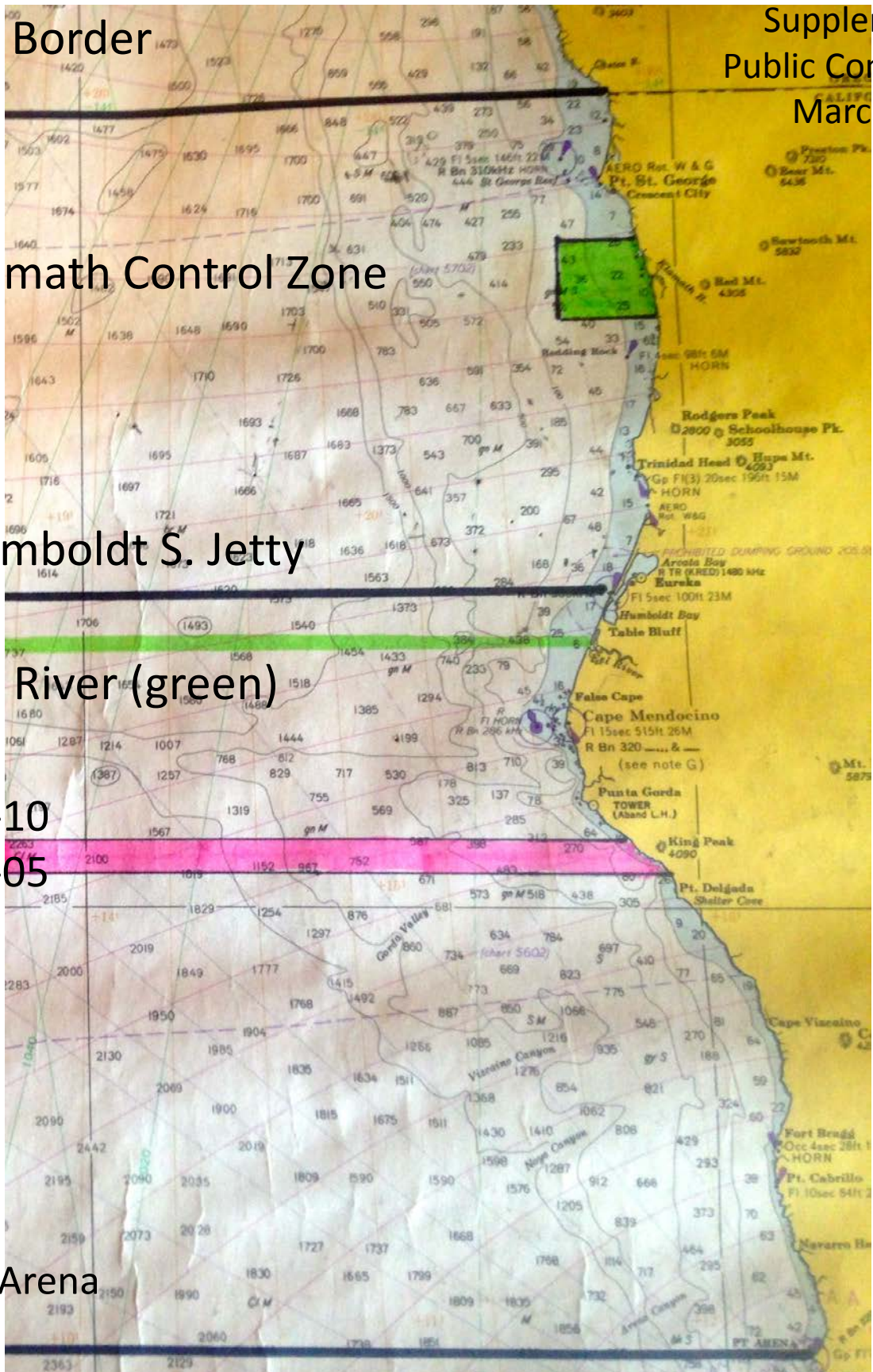
Humboldt S. Jetty

Eel River (green)

40-10

40-05

Pt. Arena



Pacific Fisheries Management Council

Re: Moving the northern boundary of Ft. Bragg Management Area five miles north from latitude 40°05' to 40°10'.

Council Members:

Good morning, my name is David Helliwell, I have owned and operated the fishing vessel Corregidor out of Eureka California for the past forty years.

I would like to start a conversation about moving the Pt Arena to Horse Mountain Management Area salmon boundary line five miles north to latitude 40-10 where it would be the same as the federal groundfish line. The current line, at latitude 40-05, cuts off the upper end of Delgada Canyon, traditional trolling ground where we were be able to troll to within one thousand feet of the beach and still be in eighty fathoms. To move this line five miles north would accomplish several things. It would put all of Delgada Canyon back in the fishery. It would put Spanish Canyon, a small submarine canyon just north of Delgada, back in the fishery. It would allow an arbitrary wall through the middle of a traditional fishing ground to be placed on the natural boundary used by the fleet since the beginning of the fishery. It would put the salmon fishery an hour closer to Eureka both coming and going, and at that point the port of Eureka would actually be closer than Ft Bragg. It would align the federal and state boundaries for ease of management and enforcement. It would expand north of Pt. Arena opportunity for the salmon fishery at a time when it will likely be constrained south of Pt. Arena for Sacramento Winter Run issues, a circumstance which underlines the need to maximize trolling opportunity in the open areas.

For the last thirty-five years the port of Eureka has been asked to give up its salmon fishery in favor of smaller Klamath impacts to the south. Those of us who fish out of Eureka have traveled further, stayed away from home longer and seen the consequent withering of our infrastructure and markets. To put fishing opportunity an hour closer to

Eureka would give some substance to healing these wounds. Especially considering it would put opportunity an hour closer both ways.

The 2015 Federal Regulations West Coast Salmon Fisheries, Section 660.408, Annual Actions (e) Management Boundaries and Zones states, (quote) “Management boundaries and zones will be established or adjusted to achieve a conservation purpose or management objective. A conservation purpose or management objective protects a fish stock, simplifies management of a fishery, or promotes wise use of fishery resources by, for example, separating fish stocks, facilitating enforcement, separating conflicting fishing activities, or facilitating harvest opportunities.” (End quote) The proposed boundary change addresses two of the three stated conservation purposes:

1. It Simplifies management of the fishery by aligning the boundary with the federal groundfish line.
2. It Promotes wise use of fishery resources by eliminating an arbitrary balkanization of a traditional fishing ground.

The third conservation purpose of protecting a fish stock is not increased by the proposed boundary change, but may not be significantly damaged by it either. The Arena to Horse Mt. management area is 67.5 miles. To add an extra 5 miles to the zone expands the area by 7.4%. It is hoped that the advantages of the first two purposes will equal or outweigh any drawbacks of the third.

It should be kept in mind that we are talking about the extreme southern end of the Klamath Management Zone (KMZ), 83 miles from the Klamath River, whereas the effective northern boundary of the KMZ is only 37 miles from the River at the Oregon border. Furthermore, 40-10 is well below Cape Mendocino, an entry point and turning basin for incoming offshore salmon, lessening impacts to those fish.

40-05 to 40-10 is also the extreme southern end of the area currently closed as a precautionary measure to protect Coastal Fall Run Chinook. The most significant Coastal Fall river, the Eel, with a length of 196 miles

and servicing a watershed of 3,684 square miles, is nine miles from the northern boundary of this closure, while it is thirty-three and a half miles from the southern boundary. The Mattole river, a less significant coastal fall river, is currently 13 miles from the southern boundary, with a length of 62 miles and servicing a watershed of 304 square miles. A change to the 40-10 line would make the buffer for the Mattole River, 8 miles above the southern boundary, more equitable with the buffer for the Eel River boundary in the north and for a river serving only 8% as much watershed.

There would be no apparent adverse consequence to the recreational fishery by moving the 40-05 line to 40-10.

To summarize, for a small change in area the fishery would experience the following significant gains:

It would promote wise use of fishery resources, as stated in the regulations, by:

- Restoring the integrity of a traditional fishing ground,
- Putting the resource closer to a port, severely damaged by restrictions on the fishery, and
- Expanding opportunity for a hopefully small cost in impacts. A question that will likely be answered by doctor O'Farrell if this proposal makes it out of this hearing.

It would align the boundary with the federal groundfish line for easier cleaner management and enforcement. This might be a good time to point out that 40-10 is the natural northern boundary line not only because the diversity of submarine geography stops here, but also because this is where the wind starts. When I say this is where the wind starts I am not talking about light vespers. From 40-10 to Gorda is usually 14 miles of white water and listening to your doors rattle as the wind sucks by them. I don't think it can be emphasized enough that the five miles from 40-05 to 40-10 is 83 miles from the Klamath River.

In consideration of this boundary change it is important to keep in mind that there will be zero Klamath impacts above 40-10 all the way to

Humboldt South Jetty, a distance of forty miles. This is due to the area being closed to all commercial salmon fishing to protect coastal falls, a circumstance which has sadly been in place for twenty years and will likely continue into the foreseeable future.

The five miles from 40-05 to 40-10 can be seen on the chart below running from the dotted line, identified as JOINS PAGE 4, north to the top of the chart. Both Delgada Canyon, Spanish Canyon and the flats in between would bring a wealth of diverse bottom and upwelling opportunities back to the fishery, addressing a “wise use of fishery resources” as identified in the Federal Regulations. Additionally, this area is in a coastal wind shadow, making it fishable to small boats in times of general rough weather with one of the best anchorages on the coast often twenty minutes away from the last tack of the day. To put this area in perspective, the run by boat to the Klamath River from 40-10 is 14 hours. Historically, 40-10 is the north end of the grounds because north of 40-10 the wind starts and continues to increase until Punta Gorda is reached, where it gets worse.

Thank you for the opportunity to introduce this proposal.

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