

Mr. Herb Pollard
Chairman PFMC

3-8-17

Dear Mr. Pollard and Council Members,

Good morning, my name is David Helliwell. I am a commercial salmon fisherman. Some of you may recall my presentation to the council last March proposing that the north line of the Fort Bragg salmon management cell be moved five miles north to latitude 40-10 (Agenda item E.4.c March 2016, consisting of four pages). This would be a minor, but extremely valuable, addition to the salmon fishery for three primary reasons: increased safety to the fleet, enhancing a sustainable and productive fishery and fishing community, and streamlining enforcement. I discussed the addition with Brett Kormos in the spring, but time constraints did not allow for the development of a test fishery and neither one of us could see how one would be designed for such a small area.

The issue involved in such a move, of course, is additional Klamath impacts. How can they be accounted for? It would appear that an estimate could be made, say a 7.4% increase in cell size might equal a 7.4% increase in Klamath impacts. Model that increase, move the line north to 40-10 for three years and measure the actual impacts based on coded wire tag recovery in the cell. As the data settle out over time, impacts to the larger cell could be assigned to the model. It is of value to note that the northern boundary line was moved from Cape Vizcaino to Pt Delgada in 1984, and then an additional four miles north in 1988 to Horse Mt.40-05'-00", its present position. The 1988 fishing Options in the Fort Bragg management cell forecasted the exact same Klamath impacts for the cell to Pt. Delgada as for the cell to Horse Mt. for all four options. At that time, the additional Klamath impacts for a four mile increase in cell size were seen as negligible.

The move improves and enhances fleet safety. The line would then be on the north side of Spanish and Delgada Canyons where the bottom is of even depth, making navigation predictable when turning to comply with regulatory lines and avoid collisions and negative interactions with a rocky bottom. With the line at 40-05 boats fish the canyon fathom curve and can only turn to the deeper side when they reach the boundary line increasing the likelihood of collisions. If it is foggy and there are lots of boats the results can be disastrous.. With the line at 40-10 the area would still be in the coastal wind shadow that ends on the north side of Spanish Canyon, making it a relatively safe area for small boats to fish and coinciding with the natural boundary of the area.

Restoring historic and traditional canyon dynamics currently bifurcated by an arbitrary management line enhances a sustainable and productive fishery. It would make the north end of the cell closer to the currently isolated port and community of Eureka than Fort Bragg, giving local Eureka boats more opportunity to fish close to home for the first time in over thirty years. Reducing the run to Eureka by an hour would take some of the pressure off Fort Bragg for its limited services when all the boats are in and would make it more attractive for Eureka boats to end their trips at home. This would improve family life and

boost the local economy, which has suffered greatly from thirty years of closure. Such a move would shift effort, but not increase effort. All the Eureka boats that still fish salmon are already engaged in the area.

At 40-10 the northern boundary line has the unique opportunity to be the same as the federal ground fish line, streamlining enforcement from two line management to one line management.

As I am sure you are aware, the southern end of the KMZ has been closed to fishing for twenty years to protect ESA listed coastal falls. If the southern boundary had been 40-10 at the time of that closure, there is no reason to believe it would not have been chosen as the southern boundary to protect coastal falls. Especially since Eel River, the primary coastal fall producer, would still be 28 miles from the new southern boundary of the KMZ and the Mattole River, of one tenth the watershed size as the Eel, would still be eight miles from the southern boundary of the KMZ the same distance the Eel river is from the northern end of the closed area.

In conclusion the move to 40-10 would accomplish three desirable outcomes. Improving navigational safety, increasing proximity to the starved port of Eureka and Streamlining enforcement.. All of these enhance “sustainable and productive fisheries and fishing communities” a core mandate of NMFS’s “Strategic Plan for Fisheries.

This is an opportunity to do something valuable for the industry, both sport and commercial, after 35 years of reallocation, restrictions and the consequences of water diversion, none of which the industry is responsible for. I ask the council to consider an option defining the north line of the Fort Bragg management cell and the southern line of the KMZ to be latitude 40-10. Thank you.

Thank you,
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