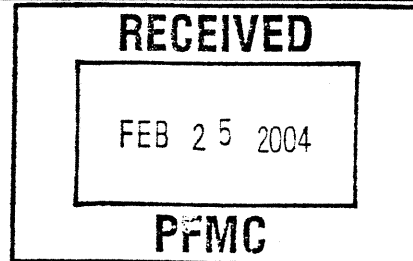


South-Central Nearshore Trap Organization

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To whom it regards concerning the cabezon assessment:

We, the South Central Nearshore Trap Organization, are concerned that the statistics used to assess the cabezon are not going to truly represent the fishery. Despite our South Central region catching 70% of the state's cabezon, we were never consulted. We feel that by using only unreliable recreational data, hit and miss ichthyoplankton surveys and power-plant impingement in warm water where cabezon do not tend to spawn, their data was marginal at best. Despite this, if you look at the data they have in the 80's and 90's, there is limited evidence of a significant decline, and in fact, you see an increase with the power plant CPUE, and larval survey. If they used 1980 to 2000 data without extrapolating the data to 1930 (50 years of guessing) to figure the stock biomass, they would have had a spawning biomass at a much higher percentage. Also, if they would have included commercial CPUE's taken by Federal Observers in each region in 1999 and in 2003 or compared fish tickets in 2003 with those in 1995 or before during the same months, they would have had a very different picture. Here's what we sent NOAA's cabezon assessment team to consider:

1. We intentionally do not catch large cabezon (over 21-22"). We have asked Fish and Game to make it a law in our region that all traps must have 5" rings in the funnels this was instituted 3 years ago. We are also pushing currently for a slot size limit to decrease the catch of large by the stick fisherman.
2. The decrease in catch in 1999-2000 was when the 3 day/week and 2 month closures were instated. The size limit was also increased to 15". The cabezon continued to be low in 2002 and 2003 secondary to a low TAC set by the fish and game allowing the fishery to be open only 4 months/3days/week in 2002 and 3 months 3days/week in 2003.
3. Cabezon like traps. They live in holes in the rocks and do not like going to drifting hooks. They are not a sport catch especially on large commercial passenger fishing vessels where it is too dangerous to get in close to shore. We have records of the last 3 years of CPFV catch out of Morro Bay and Avila and they catch 1-2 cabezon/trip if they catch any while we will set our traps on the same day in the same region and catch 200lbs. The MRVS data is proven inaccurate and is not appropriate to use on this fishery. We think C.P.U.E.s done with traps collaboratively with fisherman locally in each region is the best tool to get an accurate picture of the cabezon status.
4. We think that there are indicators that the cabezon fishery is doing well. With the long closures the last 2 years and the ring and size limits, we saw the best cabezon fishing in 10 years the few short months we were allowed to fish. Most of us didn't even get a chance to cover all the fishing grounds so many areas farther away from the harbor have gone another year untouched. We are not the only region with great catches either. We have heard the same report all up and down the coast by commercial fisherman. Look at our mandated Federal Observer information. Look at our fish tickets. Compare them to this time 5 years ago. We caught our quota in 29 days!!!! The quota is too low. Cabezon is an untapped resource that can withstand selective harvesting and continue to do well. The tremendous catches this year proves it.

5. Cabazon grow comparatively fast for a Nearshore fish. They have been proven to grow 3 1/2" per year depending on what they are eating. If they are eating abalone we think they grow faster. This makes them legal in 4 years. It takes lobster 7 years to be legal and they have a season and no set quota and have been a viable fishery for over a 100 years on the east coast and 75 years on the west coast.

6. The cabazon are a predatory fish that eat other fish including their own young. Harvesting out some of the cabazon , we think actually increases the population of the overall Nearshore fish population.

You will be lucky to have anyone left in this fishery if you use this assessment to allow further closures and smaller quotas. Currently, the cabazon allocation for commercial fisherman is 75,000lb down from 330,000lb in 1999. The trip limits set will allow less than 2600lbs/permit. This is a 80% reduction for many of us in our region. We feel this is entirely too conservative based on what we are seeing in the ocean and is wasting a valuable natural resource for harvest. We were hoping that the cabazon assessment would come up positive *if it was anywhere close to accurate* and that it would allow the commissioners to free us from these unrealistic quotas.

Please contact Tom Hafer (president) with any questions.

cc. Tom Barnes, Marine Biologist with DFG in La Jolla

Sincerely,

South-Central Nearshore Trap Org.

SOUTH CENTRAL NEARSHORE TRAP ORGANIZATION

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