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July 30, 2009

Dr. Roy Crabtree  
Regional Administrator  
National Marine Fisheries Service  
Southeast Regional Office  
9721 Executive Center Drive, North  
St. Petersburg, Florida 33702

Dear Dr. Crabtree:

As you are well aware, the alternatives currently listed in the draft Amendment 17 to end overfishing and rebuild red snapper stocks are unprecedented in their breadth and scope, and will be costly and painful to the states and recreational anglers in the affected areas. Thus, Coastal Conservation Association (CCA) feels the necessity to make absolutely sure we are using the best analysis and current information. To that end, we request that the NMFS SERO:

1. Have the red snapper stock assessment reviewed again by a panel of stock assessment experts. We are well aware the assessment has been peer reviewed through the SEDAR process and judged to be the best available science, and that the Council's SSC has concurred in that finding. However, in this special instance where the potential economic ramifications are so severe, we believe there must be another review of the assessment to make sure managers are indeed using the best available science.

If further review indicates less stringent management measures could be implemented to end overfishing and meet the rebuilding target, that would be a simple matter within the current amendment process.

2. We also believe the recent positive trend in recruitment could affect the reductions necessary to end overfishing and rebuild the stock. We request that NMFS do an analysis immediately to determine if the observed positive recruitment could lessen the reductions necessary to end overfishing.

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We are all very concerned about status of red snapper in the South Atlantic. We are fully committed to ending overfishing and restoring this stock, but we are also keenly aware of the unprecedented circumstances surrounding red snapper and its dubious management history. Given the severity of the proposed management alternatives to address this remarkably unique situation, CCA wants to make sure the least onerous solutions to this problem are pursued to the fullest.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chester Brewer', written in a cursive style.

Chester Brewer  
CCA Government Relations Chairman