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Coastal Conservation Association

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November 17, 2009

Dr. Roy Crabtree
Regional Administrator
National Marine Fisheries Service
Southeast Regional Office
9271 Executive Center Drive, North
St. Petersburg, Florida 33702

Dear Dr. Crabtree:

On behalf of the Coastal Conservation Association I am taking this opportunity to express concern regarding two recently introduced studies that may have an impact on any decision to possibly close vast areas of the South Atlantic to bottom fishing as part of any red snapper rebuilding program. We believe that the lack of timely stock assessments for red snapper that could have alerted managers to the alleged dire condition of the red snapper stock was an egregious failure of the management system and an extreme disservice to those who depend on the Councils and the National Marine Fisheries Service to conserve the common property resources under your jurisdiction. We shall, however, not elaborate on this point as it is clear that the Council is keenly aware of the lack of confidence and growing animosity towards the federal fisheries management this situation has created among the angling public.

We are enclosing a review of the SEDAR assessment recently published in *Florida Sportsman* by Dr. Ray Waldner and Dr. Tom Chesnes. This article raises several points that might potentially affect the results of that assessment. CCA asks that the Council have these criticisms reviewed and evaluated by the stock assessment team. We would also note that a recent MARFIN study conducted by Wade L. Griffin and Richard T. Woodward at Texas A&M University has produced new and higher estimates of natural mortality for juvenile red snapper in the Gulf of Mexico. If similar patterns of natural mortality are likely to occur in Atlantic red snapper, we would ask that this data from this study, "Bioeconomic Analysis of the Red Snapper Rebuilding Plan and Transferable Rights Policies in the Gulf of Mexico," be considered in an assessment run to evaluate what impact it might have on the outcome.

As the SAFMC continues to deliberate on this issue, we ask that you consider other results of the above-mentioned study, which is being sent electronically to your

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staff. That work developed a bioeconomic model to evaluate the status and use of the Gulf shrimp/reef fish fishery complex. The study is very detailed but we would point to two results that should be taken into consideration. The first shows that this complex has an estimated total present value of consumer and producer surplus over the 2009 to 2032 period for red snapper rebuilding of \$11.8 billion. Of this total, the private sector angling community would contribute \$9.1 billion. As you work to decide what use may be made of the South Atlantic Snapper-Grouper resources we urge you to take this study under consideration.

The second important point we raise in reference to the Texas A&M work is that the biological model used produced results that, if correct, contradict the previous SEDAR assessments for Gulf red snapper as they conclude that the species is not overfished and overfishing is not occurring. We ask that you forward this study to the SEDAR assessment group working on red snapper and evaluate the implications of the different modeling efforts.

Sincerely,

A handwritten signature in black ink, appearing to read 'CB', is positioned above the typed name of the sender.

Chester Brewer
CCA Government Relations Committee Chairman

cc: Duane Harris, chairman SAFMC