Congress of the United States
Washington, DC 20515

November 23, 2015

Dr. Roy Crabtree
NOAA Fisheries Service
Southeast Regional Office
263 13th Avenue South
Saint Petersburg, Florida 33701

Dear Dr. Crabtree:

In June, the South Atlantic Regional Office of the National Marine Fisheries Service (NMFS) announced that it would not open the South Atlantic red snapper fishery to commercial and recreational harvest in 2015. On behalf of our fishing constituents and the communities that depend on them, we write to express serious concern about this closure. We also have several questions about it, which we've outlined below.

(1) At the June 10, 2015 South Atlantic Council meeting, the NOAA estimate for "total removals" of red snapper in the South Atlantic in fishing year 2014 were reported by SAFMC Executive Director Robert Mahood to be 1,322,547 pounds (wet weight). This estimate, generated from an extremely abbreviated 2014 fishing year, is nearly 3 times the estimate for a full fishing year in 2013; and similar to the average annual catch estimate for the period 1992 to 2009 when fishing occurred year-round. Please explain: (a) how these estimates were derived and how they even make sense? And (b) the justification for applying a 6.42 pound average weight per fish for all fish *discarded* in the commercial, charter and private boat fisheries? We are keenly interested in the response in light of the fact that the average weight of all commercial fish *landed* in 2014 was reported to be 5.68-lb whole wet weight on Page 2 of SEDAR41-RD56.

(2) Many of our stakeholders have reported a willingness to work with the agency to conduct cooperative fisheries dependent and independent research to augment the South Atlantic red snapper stock assessment. We understand these efforts have largely fallen on deaf ears at the Southeast Science Center. Can you please report to us what specific efforts the agency is willing to make in the area of cooperative research on red snapper, and how/when they will be implemented?

(3) The last benchmark stock assessment for red snapper in the South Atlantic was conducted in 2010. The fishery was subsequently closed on a controversial vote by the SAFMC. Why, in the face of such a controversial closure, did the agency wait 6 years to update the assessment?

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(4) During the July 2014 Review of the NOAA-NMFS Southeast Fisheries Science Center Stock Assessment Review Process (Miami, FL), one of the anonymous reviewers cogently laid out the situation as follows:

> *In summary, the problem here is not the assessment models or capabilities of the scientists, but strictly data quality and quantity. It cannot be solved by newer, more complicated models, but rather by obtaining consistent, long-term funding for fishery independent surveys. Adequate survey data will improve the reliability of assessments and eliminate the need to generate fishery dependent indices of unknown reliability.*

Please explain what the agency has done over the past twelve months (since the Science Center review) to address these concerns? Also, please specify what the agency plans are going forward to address these deficiencies?

(5) At the same external review of the NMFS-SEFSC stock assessment process in July 2014, a reviewer indicated that most fishery stocks assessed in the South Atlantic region are "data-poor." Yet, assessment models of these fishery stocks rely upon a significant amount of annual "catch-at-age" data. How can the NMFS-SEFSC continue to run complex "catch-at-age" models with so little data on important stocks, such as Red Snapper (SEDAR 24), and with such significant fisheries management implications based upon the model output?

(6) The 2006 MSFCMA reauthorization and the new ACL requirements added increased demands for better stock assessments. Unfortunately, when the demand for better science is not met, there is the potential for negative impacts on fishing stakeholders, especially on data-poor stocks. Please explain how this situation has manifested on red snapper in the South Atlantic region?

(7) A National Academy of Sciences (National Research Council) review (2006) of NMFS' marine recreational landings survey program requested a revision of the accounting method for recreational fishing fleet landings. The NMFS' MRIP recreational landings and discards survey utilizes a new method (APAIS), implemented to re-calibrate historical landings for Gulf and South Atlantic Red snapper stocks. Based on this information, how will the new MRIP (APAIS) calibration be accurate and precise enough to inform proper management; and how will stakeholders be assured there will be adequate year replication using this method to revise the total historical landings and discards record for the recreational fishing fleets in both the Gulf and South Atlantic?

We look forward to your prompt response to these questions, and to your commitment to do everything you can to improve the science and reopen this valuable fishery as soon as possible.

Sincerely,

Walter B. Jones
Member of Congress

Patrick E. Murphy
Member of Congress