

Subject: Data/Model Manipulation Thesis

To: South Atlantic Council/Dr. Steve Murawski/Inspector General Department of Commerce

I am currently working on a thesis paper in regards to SEDAR 15 and data manipulation. I am writing you today so that you can read it for yourself. On February 10th, I had a conference call with a group of scientists from NMFS. Dr. Erik Williams said something very important in that discussion. Paraphrased he said, "Even if we lowered the recreational catch by millions of pounds annually during the 1946 to 1966 period it would not change the status of the stock". This stuck with me the entire day and my only question was, "How is that possible?"

He also said that recreational fishermen caught almost seven times the red snapper that the commercial sector did in 1962 (4,729,000 pounds to 717,000 pounds). I knew that this was completely impossible, because the recreational sector in those days consisted of a seasonal charter boat fleet, small seasonal headboat fleet, and almost zero recreational fishermen for a variety of reasons.

I finally found the answer in SEDAR 15, SAR 1, Section III, pages 5-10. The title is, Discussions and Recommendations Regarding Data Modifications and Updates. In this section there is a major discussion on how the scientists are going to make the data and the model fit each other and making the entire model defensible.

The major problem is that the data that they used to fit the model is useless. It is from the headboat length composition data from 1978 to 1983. The headboats of this time period rarely fished outside of 30 miles. During this time period this inshore area was probably overfished and there were no regulations in place. They did not collect any age samples from over 50% of the known red snapper territory, the area where older fish are known to move as they age. Then they tried to fit the model and it would not work until the recreational catch data was manipulated over and over until it fit the data that they had.

The headboat data set was the best and only age data that they had before the 1984 regulations and the only way to make it work was to kill off millions of pounds of red snapper by manipulating the very untrustworthy recreational data prior to 1982. Millions of pounds were killed by clicking a mouse. It is right there in SEDAR 15 in black and white.

This is something that the council needs to discuss at the meeting in March. At least we have the answer to the question, "How can the science be so far off from what fishermen are seeing in the ocean?" The data was manipulated to make the biomass model fit the incomplete headboat data. That is how the red snapper got below 3% of historic biomass. Now the council is ready to close the ocean without good cause because of an incomplete data set that no one questioned all the way through to the review process.

I am working on the details of my thesis and it should be out soon. I believe NMFS should do an in-house investigation into this before the Inspector General gets to it.

Thank you,

Captain David Nelson