CITY OF NEW BEDFORD
JONATHAN F. MITCHELL, MAYOR

August 23, 2012

Scientific and Statistical Committee
c/o New England Fishery Management Council
50 Water Street
Newburyport, MA 01950

Dear Members of the Scientific and Statistical Committee:

As you know, on August 2, 2012, the New England Fisheries Management Council (NEFMC) and the National Oceanic and Atmospheric Administration (NOAA) released a document indicating reductions ranging from 45% to 73% in the Annual Catch Limits (ACLs) for FY 2013 for a number of stocks in the Northeast multispecies fishery.

The Scientific and Statistical Committee (SSC) has responsibility under the Magnuson-Stevens Act to make recommendations for acceptable biological catch, MSA § 302(g)(1)(B), which in turn limit ACLs developed by the NEFMC, MSA § 302(h)(6).

We write today to urge the SSC to recommend that no changes be made to the current ACLs until there is confidence in the accuracy of the stock assessments. We believe for the SSC to act otherwise would induce devastating economic and social impacts on the cities of New Bedford and Gloucester, Massachusetts on insufficient grounds.

The multispecies fishery plays a critical role in the port economies of both New Bedford and Gloucester. Annual groundfish revenues in New Bedford and Gloucester are approximately $20 million and $27 million, respectively. A conservative multiplier for the groundfish fishery – which takes into account the economic activity of its shoreside businesses, such as shipyards, ice, fuel, gear, welding, transport, and business functions – is three. Taken on its own, then, the groundfish industry is worth a combined total of $141 million to New Bedford and Gloucester alone. But this number does not tell the whole story. One species in the multispecies fishery, yellowtail flounder, is essential bycatch in the scallop fishery. In New Bedford, scallops generate approximately $400 million in annual revenue and $1.2 billion in annual economic activity.

If implemented, the forecasted cuts would deal a crippling blow to the groundfish and scallop industries and eliminate hundreds, if not thousands, of jobs. The reduced ACLs would also likely accelerate the consolidation process unleashed in 2010 by the imposition of the sector management system in the multispecies fishery.

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The forecasted cuts would be painful to accept if they were based on ironclad science, but they are impossible to accept in light of the growing lack of confidence in the stock assessments. Hardly a month goes by without news of a new stock assessment crisis, in which the government announces, seemingly without adequate scientific explanation, that a once healthy stock is in jeopardy.

The most recent crisis concerns the Georges Bank yellowtail flounder stock assessment, which appears to be based on a flawed model. Months earlier, the 2011 Gulf of Maine cod assessment, which showed a dramatic negative change from the 2008 assessment, was called into question. And when the 2011 Groundfish Stock Assessment Updates were conducted, significant unexplained discrepancies (19% to 67% deviations) in the estimate of stock biomass were noted for seven stocks (CC-Gulf of Maine yellowtail, Georges Bank cod, Georges Bank haddock, plaice, witch flounder, redfish, and Gulf of Maine haddock).

Given the uncertainty in the stock assessments – but the certain economic, social, and cultural destruction in New Bedford and Gloucester if the forecasted cuts were to be implemented – we ask you to recommend to the NEFMC that the status quo in ACLs be maintained while the uncertainties in the science are examined.

Ideally, the examination of the scientific uncertainties would occur through an end-to-end stock assessment review encompassing all aspects of the current system, including data collection processes, data synthesis, population models, assumptions, and uncertainties. One specific question that should be addressed is the biological reference point, which sets what is believed to be the sustainable level of fishing for particular stocks. We understand that a value of F40% is used for most New England stocks. Yet a F35% value is used elsewhere. We believe this inconsistency should be examined and eliminated, if scientifically justifiable. A more optimistic view of stocks would result. In addition, a review should address whether for certain stocks, such as Georges Bank yellowtail flounder, there is undue emphasis on a single model.

Maintaining the status quo while the science is examined would further National Standard 8 of the Magnuson-Stevens Act, which requires that conservation and management measures take into account economic and social data in order to provide for the sustained participation of, and to minimize adverse economic impacts on, fishing communities. The New Bedford and Gloucester fishing communities have consistently played by the rules, yet the federal government has consistently ignored the human impact of its regulations. Deferring implementation of the forecasted reductions would send a strong signal that the fisheries management system cares about people, not just fish, and that it will not wreak havoc on traditional fishing communities unless it is certain that its science is right.

If the fisheries in New Bedford and Gloucester are shut down, customers will establish relationships to purchase seafood from foreign sellers, and today's customers will not come back. Both cities will lose not only jobs and dollars, but also integral parts of their cultures and

identities. We urge the Scientific and Statistical Committee to recommend to the Council a pause before any changes are made to the status quo, allowing time for scientific uncertainties to be resolved.

Sincerely,

Jon Mitchell
Mayor of New Bedford, MA

Carolyn Kirk
Mayor of Gloucester, MA