

March 22, 2010

Jane Lubchenco National Oceanic and Atmospheric Administration 1401 Constitution Avenue, NW Washington, DC 20230

Re: Catch Share / Sector Management in the Northeast Region

I hope this letter finds you well. I sincerely appreciate Assistant Administrator, Eric Schwaab, participating in the Northeast Fisheries Summit to open a dialogue on how to foster change in fisheries management, and best balance conservation of fish stocks, with the economic vitality of fishing communities. With over 300 in attendance representing the fishing industry, non-profits, the banking industry, and all levels of government we took a major step forward, but much more work needs to be done to establish a framework of trust, cooperation and respect between all parties.

Several key points regarding the catch share/ sector management system were raised at the Summit that merit your prompt attention. First, there continues to be a lack of understanding and buy-in from much of the industry regarding this system. Secondly, the science driving allocations is problematic. The allocations for certain "choke" species (i.e., Pollock, Yellowtail, Winter Flounder) appear extremely conservative. Extreme precautions associated with these allocations will terminate fishermen's ability to harvest target species for which he/she may have remaining allocation, but can no longer fish due to inadequate allocations of "choke" species. Further compounding the problem is that the allocation of skate is based on pooling 6 underfish with 2 overfish species. As we have pointed out on several occasions, this makes no sense. Skate allocations will cost New Bedford 300 to 500 jobs. If we proceed along the lines contemplated, we will lose 50% of our fleet. This cannot be accepted in these difficult economic times.

At the Summit, key NOAA officials admitted that the catch share/sector system is a "work in progress" and that they will adjust the management allocations as the program develops. An admission of this magnitude by the regulatory authority is disconcerting, and is an irresponsible way to launch a new program that we know will cause certain harm to the people who work in the industry if not done properly. Given your extensive experience with catch share/sector management, you clearly can understand our position that once a regime of catch share/sector management is implemented it is irreversible. Therefore, it is paramount that the system be

implemented correctly based on solid scientific data, that NOAA has a real understanding of the socio-economic impacts of the system, and that it is fair to all fisheries.

Based on these very real concerns, I urge you to <u>temporarily delay</u> the implementation of the catch share/sector program until such time that these issues have been addressed and the government has a clear understanding of the effects of the new system on the fishing families of New Bedford. The individuals in this industry do not deserve to be subject to a system which is a "work in progress". In other words, let us insure that the appropriate species allocations are in place based on relevant scientific data <u>prior</u> to beginning the catch share/sector management system.

I am confident that collaboratively we can build an action plan that brings a <u>successful</u> new management procedure and together we can work to frame a plan that takes into account due process, fairness, contemporary data and analysis of stock assessments, and provides adequate infrastructure for management.

Thank you in advance for your consideration, and I look forward to your reasoned response.

Sincerely,

Scott W. Lang Mayor, City of New Bedford

Cc: Secretary Gary Locke, U.S. Department of Commerce Senator John Kerry Senator Scott Brown Congressman Barney Frank Congressman John Olver Congressman Richard Neal Congressman Jim McGovern Congresswoman Niki Tsongas Congressman Jim Tierney Congressman Ed Markey Congressman Michael Capuano Congressman Stephen Lynch Congressman William Delahunt Senator Susan Collins Senator Olympia Snowe Senator Judd Gregg Senator Jeanne Shaheen Senator Jack Reed Senator Sheldon Whitehouse

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