



CITY OF NEW BEDFORD

SCOTT W. LANG, MAYOR

April 27, 2010

John Pappalardo  
Chairman  
New England Fisheries Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950

Re: Scallop Framework Adjustment 21

Dear Mr. Pappalardo:

Thank you for your attention, as the Mayor of the number one fishing port in the nation I write to you today to express my grave concern with the management of the fisheries in New England. New Bedford's fishing industry creates a one billion dollar economic impact on the region and employs over 4,000 people. New Bedford is a full service port with over 200 businesses that support the commercial fishing industry. The jobs as well as the tax base the businesses provide are directly tied to the vitality of the fishing industry. As a result of the lack of a comprehensive assessment of the socio-economic impacts of the Council's management systems, as required under Rule 8 of the Sustainable Fisheries Act (SFA), the Council (NEFMC) continuously makes decisions that threaten our employment, our economy, our working waterfront infrastructure, and our fishermen and their families. In short the NEFMC policies negatively affect people without the Council having any clear understanding of the real impact its policies have on the social fabric of New England's ports.

On topic for your meeting, I ask that you consider the following responsive actions on the promulgation of frameworks for skate and yellowtail.

**Skate:** The reduction of the skate allowable biological catch from 20,000 pounds to 1,900 pounds is an enormously drastic measure (a 90.5% reduction). A reduction of this magnitude will have irreversible harm on the economic sustainability of fishing communities, and at its core, violates National Standard, Rule Number 8 that requires the consideration of the socio-economic impacts of your actions. Forecasts suggest this will result in the loss of 300 jobs in New Bedford alone. The proposed cuts come at a time when New Bedford is digging out of one of the worst economic downturns in history and

grapples with an unemployment rate of 11.8%. This is no time to make decisions of this scale. The small token increase to 5,000 pounds (a 75% reduction), while appreciated, will not be sufficient given the enormity of the challenges confronting the New England fishing industry due to the catch shares/ sector management program that takes effect on May 1, 2010.

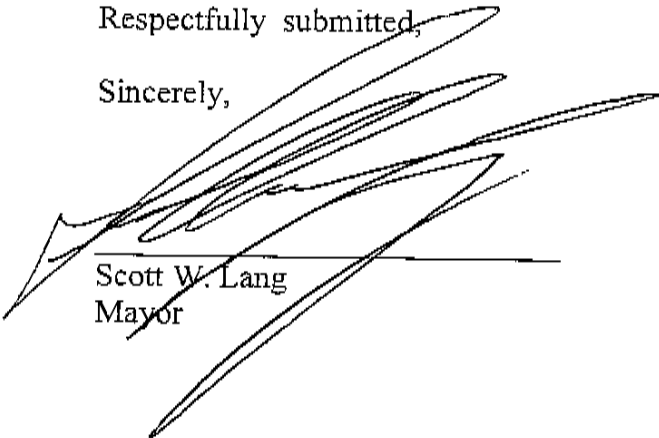
**Yellowtail Flounder:** 16 US Code Section 1854 of the Magnuson Act requires the rebuilding of stocks at a minimum of 10 years. The NEFMC has voted to rebuild the yellowtail stocks in 7 years. The entire issue associated with yellowtail landings could be resolved with a vote to rebuild yellowtail in 10 years, also analyzing the current data on yellowtail stock assessments may alleviate some of the pressure on the groundfish and scallop industry as well.

I would like to re-emphasize my position as noted in my letters of March 22, 2010 and April 20, 2010 (Attached herein) urging a temporary delay on catch shares / sectors for groundfish while current data is reevaluated and allocated to provide scientifically sound and rational catch limits. Please note my strong opposition to the integration of a catch share / sector management system between groundfish and scallop fisheries. New Bedford's billion dollar commercial fishing industry should not be penalized to the point of catastrophic loss, over the bi-catch of yellowtail.

The sustainability of all of New England's fishing communities is being threatened by a management system that is not ready to be implemented. I urge you to take a step back and identify both the intended and unintended effects of a system that does not have appropriate species allocation under the law, and ignores the real threat to the sustainability of people who make their living in the fishing industry.

Respectfully submitted,

Sincerely,



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Scott W. Lang  
Mayor