



CITY OF NEW BEDFORD

SCOTT W. LANG, MAYOR

March 8, 2011

Senator John F. Kerry
304 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Kerry:

For the purpose of the March 8, 2011 hearing on Magnuson-Stevens Implementation being held by the Commerce Subcommittee on Oceans and to be chaired by Senator Begich, attached is a copy of a report "Quantifying Uncertainty in Catch Forecasts" written by Professor Steven X. Cadrin, Ph.D of the Department of Fisheries Oceanography in the School for Marine Science & Technology at the University of Massachusetts, Dartmouth. It was prepared for and delivered at the National Annual Catch Limit Scientific Workshop in Silver Springs, Maryland on February 15-17, 2011. I respectfully request that this letter and Professor Cadrin's report be inserted into the committee report at this March 8th hearing. Background on this report and an overview of the economic pressures on New England's fisheries are provided below.

The crux of the problem arises from the fact that overly cautious annual catch limits have caused job loss and negatively affected the lives of citizens in Massachusetts. Commercial fishing is the economic backbone of New Bedford, America's #1 fishing port, with 500 vessels working out of the Port and employing over 4,400 people. For the past 300 years, the fishing community has been a significant part of our identity and cultural way of life. It is paramount that the rules and regulations that impact the livelihood of fishing communities be implemented properly, in accordance with the Magnuson-Stevens' Act's National Standard 8, which requires that the economic needs of communities be balanced with the preservation of our fisheries resources. Such is not the case today and fishing communities across New England are collapsing as a consequence. Since May 1, 2010, thousands of people have been put out of work in the New England region, with no evidence of benefit to the fisheries resource.

Many scientific recommendations that were formed before the new fishery management system was defined are not an appropriate basis for annual catch limits, because they are overly precautionary. The 1996 version of the Magnuson Act was black-or-white: fisheries were either overfishing or not, and catch advice was based on the overfishing level.

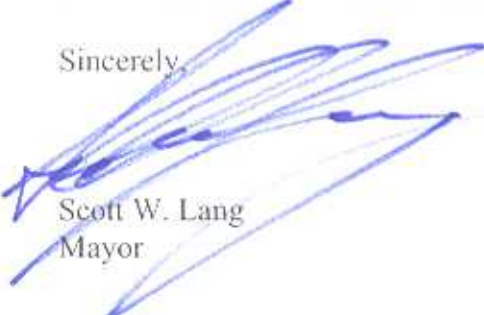
'Overfishing' is clearly defined in the Act as exceeding the level of fishing that produces maximum sustainable yield. However, scientific conventions for black-or-white determinations of overfishing typically erred on the side of caution. Instead of determining overfishing based on maximum sustainable yield, overfishing is often determined according to approximations that are expected to produce nearly as much as maximum sustainable yield in the long-term by conserving a much greater abundance of fish.

The 2007 reauthorization of the Act requires Annual Catch limits "such that overfishing does not occur." The guidelines developed by the Fisheries Service recognize that fishery science is inexact and that catch limits need to consider uncertainty in the overfishing limit and how risky stakeholders want to be, with stakeholders represented by the Regional Fishery Management Councils. Catch limits are no longer black-or-white. Unfortunately, as Councils revised fishery management plans to meet the 2010-2011 deadlines for Annual Catch Limits, they used scientific information that was developed for the black-or-white management system. The result is that the overfishing limits are themselves precautionary, and layering an additional uncertainty buffer between the overfishing limit and the catch limit creates catch limits that are much more cautious than Councils intend them to be.

This additional precaution in the overfishing limit comes at great short-term cost and requires rebuilding to much greater stock sizes than mandated in the Act. The unnecessary additional precaution is costing jobs, causing economic harm, and hurting our citizens.

These considerations are extremely important as hearings proceed on Magnuson-Stevens Act implementation. Thank you for your assistance to insert this letter and compelling report on the record at the March 8, 2011 hearing on Magnuson-Stevens Implementation being held by the Commerce Subcommittee on Oceans.

Sincerely,



Scott W. Lang
Mayor