



## CITY OF NEW BEDFORD

JONATHAN F. MITCHELL, MAYOR

January 28, 2013

New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950

Dear Members of the New England Fishery Management Council:

As you heard at the last few Council meetings, the forecasted cuts in the groundfish fishery will have a devastating impact on fishermen, their families, and fishing communities throughout New England. More than at any other point in memory, the fishing industry needs the government to do everything in its power to prevent or mitigate the impact of the impending cuts. To that end, I ask that the Council continue to push for any and all measures that could help keep the industry alive. These measures include:

- (1) Reconsideration of interim measures: Just last week, Regional Administrator John Bullard rejected your request to implement interim measures for Gulf of Maine (GOM) cod and GOM haddock. On January 25, 2013, members of the Massachusetts congressional delegation asked Mr. Bullard to reconsider his policy decision on the proposed interim measures. I strongly endorse the Massachusetts delegation members' request and urge the Council also to ask Mr. Bullard to revisit the possibility of interim measures.
- (2) Plan to mitigate impact of cuts: In their January 25, 2013 letter, the members of the Massachusetts delegation also requested that Mr. Bullard develop a plan detailing actions NOAA would take to mitigate the economic impact of the groundfish cuts. I ask that the Council make every effort to ensure that NOAA develops such a plan. While our federal delegation has been assiduously working to secure disaster relief for our groundfishermen, funding is not assured, and we must use every possible means under the Magnuson Stevens Act to help the fleet and their families.
- (3) Analysis of Failed Rules: I ask the Council to request that NOAA develop a detailed analysis of how the government's rules failed the groundfish fishery. This analysis would be essential to identify targeted measures that might assist the groundfish fishery, as well as to ensuring that the same mistakes are not repeated in other fisheries.
- (4) Reconsideration of reference points: I ask that the Council reconsider the current reference points for all groundfish stocks, as requested by the Northeast Seafood

Coalition (“NSC”) in its January 17, 2013 letter to the Council. The NSC states that the existing choice of F40% generates rebuilding targets that might be difficult, if not impossible, to achieve within the Magnuson Stevens Act’s rebuilding timeframes. Moreover, the NSC states that that Council was not fully advised of “the potentially more desirable and scientifically sound alternatives” when it made the decision to adopt the F40% reference point. Given that lower reference points could mitigate or eliminate the current fishery crisis, I strongly urge the Council to revisit the issue of whether F40% is an appropriate choice for all groundfish stocks.

- (5) Attention to Georges Bank yellowtail flounder: I am grateful to the Council for its conclusion that a quota of 1150 metric tons for Georges Bank yellowtail flounder for the 2013 fishing year is appropriate. In recommending a status quo quota, the Council properly recognized both the uncertainties in the yellowtail assessment and the human consequences that would result from the 500 metric ton quota recommended by the Transboundary Management Guidance Committee. I ask the Council to pay close attention to whether the 1150 metric ton quota is in fact implemented and to urge NOAA to approach Canada about reconsidering the overall Georges Bank yellowtail quota for 2013, if NOAA believes that the United States-Canada Transboundary Resource Sharing Understanding precludes it from adopting the recommended 1150 metric ton quota.

Finally, before too long, the process of establishing ACLs for the 2014 fishing year will begin, and the problems relating to the Georges Bank yellowtail flounder assessment might recur. In order to get ahead of these difficulties, I ask that the Council request: (1) an analysis of the uncertainties and assumptions undergirding the most recent assessment; and (2) that the Northeast Fisheries Science Center, in coordination with SMAST, conduct a short-term survey of the yellowtail resource. These two actions will help everyone better understand the status of the stock, which in turn will build confidence in whatever ACLs are established for the 2014 fishing year.

Thank you for your consideration.

Sincerely,



Jon Mitchell  
Mayor