

Correspondence

John Bullard
Northeast Regional Administrator
National Oceanic and Atmospheric Administration
55 Great Republic Drive
Gloucester, MA 01930



September 27, 2012

Dear Regional Administrator Bullard:

As commercial fishermen, we write today to express our extreme concern over the current push to open the groundfish closed areas throughout New England. The current state of our groundfish stocks have prompted the Secretary of Commerce to issue a disaster declaration for our fishery, which has been supported by the majority of industry members. All New England fishermen are facing extremely difficult economic times over the next few years and looking for any relief that can be found. However, opening the groundfish closed areas, especially those in the Gulf of Maine, is not the answer that we need as any potential gains would come at the expense of the health of the fish stocks and our collective futures.

Annual catch limits (ACLs), and the science that they are based on, have been shown to be flawed and often uses data years older than what we are actually experiencing on the water. Our most recent experience with the Gulf of Maine cod stock is a stark example as to why opening the groundfish closed areas, particularly those in the Gulf of Maine, is a dangerous proposition. Many of us fish the edges of these closed areas and believe that they have played a role in protecting what is left of the Gulf of Maine fish stocks. We can also attest to the sensitivity of these areas and are concerned that opening them would create an influx of effort that would drive stocks, like the Gulf of Maine cod, to the brink of collapse. There is little trust within the fishing industry that the current ACLs are properly set. Until fish stocks are trending upward, an effective monitoring program is in place, and fisheries science is timely and accurate, opening the Gulf of Maine groundfish protected areas to highly concentrated effort is a roll of the dice that our managers should not be willing to take.

The fact that our stocks have not rebounded should not be a referendum on the effectiveness of groundfish closed areas. Instead of opening these areas, the focus should be on ensuring that the stocks have a chance to recover and getting our fishing fleet through what is most certainly a disaster without undermining our future. Please keep these closed areas closed. The knee jerk reaction of loosening regulations to address economic hardships is shifting the focus away from the fact that these hardships are being caused by a lack of resource and dwindling stocks. There are many issues in our current management scheme that must be addressed, but doing away with the closed areas is not one of them.

Sincerely,

The Undersigned

cc: Paul Howard, NEFMC

cc: TN, FH (9/28), Council

Joe Nickerson, F/V Hayley Ann- Portland, Maine
Bryan Bichrest, F/V Safe Haven- Cundy's Harbor, Maine
Troy Bichrest, F/V Pamela Grace- Cundy's Harbor, Maine
Steve Benner, F/V High Roller- Port Clyde, Maine
Glen Libby, F/V Capt'n Lee- Port Clyde, Maine
Tom Casamassa, F/V Theresa Irene III- Saco, Maine
Randy Cushman, F/V Ella Christine- Port Clyde Maine
Gerry Cushman, F/V Bug Catcher- Port Clyde, Maine
Kelo Pinkham, F/V Jeanne C- Trevett, Maine
Knoep Neiuwkerk, F/V Cammie Kendrick- Kennebunk, Maine
Gary Libby, F/V Leslie and Jessica- Port Clyde, Maine
Russell Daggett, F/V Sarah Gale- Arundel, Maine
Justin Libby, F/V Capt'n Lee- Port Clyde, Maine
Donald Paulsen, F/V Misty Mae- Cushing, Maine
Roger Allard, F/V Wade's Way -Cundy's Harbor, Maine
Preston Carter, F/V Shannon Dawn- Friendship, Maine
Alexander Todd, F/V Jacob and Joshua- Freeport, Maine
Tad Miller, F/V Julie Ann- Tenants Harbor, Maine
Dale Martel, F/V Endeavor- Old Orchard Beach, Maine
Jason Joyce, F/V Andanamra- Swans Island, Maine
Russell Brewer, F/V Look Out- Boothbay, Maine
Ed Snell, F/V Rita B- South Portland, Maine



CITY OF NEW BEDFORD

JONATHAN F. MITCHELL, MAYOR

September 26, 2012

New England Fisheries Management Council
50 Water Street
Newburyport, MA 01950



Dear Members of the New England Fisheries Management Council:

As you know, on September 13, 2012, United States Commerce Secretary Rebecca Blank issued a fishery disaster determination for the Northeast Multispecies Groundfish Fishery ("groundfish fishery") for the 2013 fishing year. The federal disaster determination was a direct result of a document released on August 2, 2012 by the New England Fisheries Management Council (NEFMC) and the National Oceanic and Atmospheric Administration (NOAA) that indicated reductions ranging from 45% to 73% in the FY 2013 Annual Catch Limits (ACLs) for a number of stocks in the groundfish fishery.

As the mayor of New Bedford, Massachusetts, which was just named the nation's highest grossing fishing port for the twelfth year in a row, I am extremely grateful to our congressional delegation and Governor Patrick for pressing the Commerce Department to issue the disaster determination.

At the same time, however, I strongly urge you to consider additional, complementary policy responses that will forestall or mitigate the forecasted cuts in ACLs and help keep fishermen fishing. As you address proposed ACLs and other conservation measures in the coming days and weeks, I ask that you refrain from making decisions in which the reliability of the underlying science is in question. It is imperative that members have confidence in the scientific grounds for their decisions, given the potential deleterious economic and social consequences.

The economic and human stakes for New Bedford of your upcoming decisions cannot be overstated. Annual groundfish revenue in New Bedford is approximately \$20 million. One species in the multispecies fishery, yellowtail flounder, is essential bycatch in New Bedford's scallop industry, which alone generates approximately \$400 million in direct annual revenue. A conservative multiplier for these fisheries, which takes into account the economic activity of their shoreside businesses, is three. Taken together, then, the groundfish and scallop fisheries account for nearly \$1.3 billion in annual economic activity in New Bedford.

Given these numbers, even if Congress appropriates \$100 million in aid for the New England groundfish fishery, the forecasted cuts would undoubtedly deal a devastating

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economic blow to New Bedford and permanently eliminate hundreds, if not thousands, of jobs. The cuts would also likely trigger severe social dislocation, with fishing families losing their income streams, homes, and identities. The New Bedford fishing community wants to survive. To a person, all of the fishermen with whom I have spoken have said that they do not want handouts, but want to keep fishing.

The forecasted cuts and their consequences would be painful enough for the New Bedford fishing community if the underlying science was beyond debate, but they are unacceptable in light of the growing lack of confidence in the stock assessments, both among fishermen and scientists. For example, fishermen have repeatedly told the federal government, thus far to little avail, that the underlying surveys are conducted with the wrong types of vessels and gear and are therefore inaccurate. Over the summer, scientists raised serious questions about the model used for the Georges Bank yellowtail flounder stock assessment. 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).

To my mind, these examples should give serious pause to the range of decision-making on ACLs contemplated by the Council. I was pleased to see that at its August 24, 2012 meeting, the Scientific and Statistical Committee (SSC) discussed the concerns with the Georges Bank yellowtail flounder model and decided to recommend a range of catch options up of to 1,150 metric tons (the FY 2012 catch limit). By including this upper range of 1,150 metric tons for FY 2013, the SSC recognized the prudence of proceeding cautiously in the face of uncertainty in the underlying model and the impact of its decisions on fishing communities.

In sum, I ask that you keep the economic and social ramifications at the forefront of your discussions, and that you consider whether proposed measures that curb fishing are justified by the science. I also ask for your support of measures that would mitigate the consequences of any reduced ACLs. If the fisheries in New Bedford are shut down, they will not come back. The barriers to entry are simply too high, and foreign sellers, who already supply 91% of our nation's seafood, will fill the breach. On behalf of the fishermen, the families, and the nearly 100,000 New Bedford residents who have a stake in your actions, I ask that you do all that you can to keep New Bedford's fishermen fishing.

Sincerely,



Jon Mitchell
Mayor of New Bedford, MA

