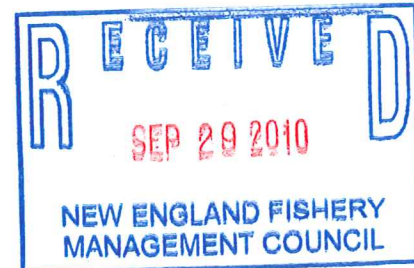




NEW BEDFORD HARBOR DEVELOPMENT COMMISSION

Wednesday, September 29, 2010

Mr. John W. Pappalardo, Chairman
Mr. Paul Howard, Executive Director
New England Fisheries Management Council
Water Street, Mill 2
Newburyport, Massachusetts 01950



Delivered to the Council in session at Newport, Rhode Island

Dear Chairman Pappalardo and Director Howard:

A few weeks ago, we learned that once again in 2009, New Bedford remains the nation's largest seaport in terms of the value of landings. We have a full-service port, with hundreds of businesses that support commercial fishing. Last month, when Hurricane Earl threatened, we witnessed hundreds of vessels both large and small, take shelter in our protected harbor, and make use of our facilities. The quarter of a billion dollars in landings of groundfish and scallops makes the continued existence of this port possible. But the positive effects the fishing industry brings do not stop at the waterfront.

The one billion dollar impact of the fishing industry results in employment for over 4,000 people. Unemployment in New Bedford ranged from 9%-15% during the recent recession. The fishing industry is our economic backbone. Every decision you make here at the New England Fisheries Management Council echoes throughout our city and the surrounding towns in our jobs, our tax base, and our economy.

On the question of stacking and leasing of scallop permits, I'd like to add to the thoughtful comments of Paul Diodati, Massachusetts Director of Marine Fisheries. Mr. Diodati made clear, in his letter of September 24, the potential for consolidation of the industry into too few hands, and the negative impacts on those who cannot or do not stack or lease (such as single vessel, single permit owners). You must not take an action that could result in consolidation and monopolization of the fleet.

I question whether the stacking and leasing proposals constitutes an industry-driven management strategy, with broad support. I reiterate the call I made in my letter of July 13 for an industry-wide referendum before any action on stacking and leasing is taken.

As Mr. Diodati also observed, the Council has been silent on the questions of which values to promote, the future of the fishery, and the look of fishing communities.

As mayor of the nation's seaport with the most valuable catch – a catch to which the scallop industry contributes in large part – I am here today to make clear to each of you that silence on those issues is unacceptable and inconsistent with National Standard 8 of the Magnuson-Stevens Act.

Permit leasing could have serious negative consequences not only on large segments of our fleet, but also on shore side and other support businesses. It would affect the economy and social fabric of our community. Your decisions in Council affect more than just our industry. You affect our unemployment. You affect our households. You affect our people.

For the council to allow this without analyzing these impacts and articulating clearly its understanding of the potential affect of those impacts, ignores the law, which instructs you to “take into account the importance of fishery resources to fishing communities in order to provide for the sustained participation of such communities, and to the extent practicable, minimize adverse economic impacts on such communities.”

The resource is not over-fished, which, as I noted in my letter of July 13, calls into question Amendment 15 and the NEFMC move toward capacity reduction via stacking and leasing of limited access permits. There is no biological or ecological need for this action.

Until this council has carefully studied the effects stacking and leasing has on communities including the effects on individual households, housing, education, taxes, unemployment, and infrastructure – to name just a few – you have not done your work.

I recognize that each of you was appointed to the Council because of your experience in particular aspects of the various managed fisheries. However, in addition to the deep understanding each of you brings to the table in specific areas, I respectfully suggest that a broader look at the overall fabric of the industry as a whole and our coastal communities is necessary. An inter-disciplinary understanding of the complex economies of our coastal communities is needed for you to fully understand the impacts of your votes.

Accordingly I invite each of you, at your first opportunity, to visit our port and coastal community – not to revisit aspects of the industry which you know well from your own backgrounds and your work here – but to focus on the socio-economics of the community at large.

I thank you very much for the opportunity to submit my comments to you today, and appreciate your careful consideration of these issues.

Sincerely,

Scott W. Lang
Mayor of New Bedford