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30 May 2019

Dr. John Quinn
Council Chairman
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

Dear John:

Following up on my comments to the NEFMC during the April 2019 I would like to submit this on the draft final report "Program Review of New England Research Set-Aside Programs". The report is comprehensive but presents a different view of the goal of the RSA program than my understanding. The first point the report makes I agree completely with, that we should strive to improve the program but take care not to lose what we have. As the Chair of the ICES scallop working group for the past six years I can confidently say that the RSA Scallop program we have developed is the envy of all scallop fisheries scientists. The research and resulting knowledge it produced is substantial and has had a direct, positive, impact on the management of the fishery. The scallop resource is a scientific, management and fishery success.

A key concern I have is with the proposed increased role the NEFSC scientists in directing the research. I have been involved with this program since its inception, and I was at the Council meeting that discussed its creation. The report states that there is a general understanding "that RSA projects produce scientific information mostly (but not exclusively) intended to support fishery management." So, the science needs to be "the best available science", which means it must be repeatable. Repeatability means you must achieve the same results even if you use a different sampling method. It is the idea of obtaining a second opinion, when you receive an answer from an expert such as a medical doctor. This idea was a driving force behind the creation of the RSA program. The report does not mention or present this, rather it seems to steer away from it. Statements such as, "Alternative Science: to create alternative or competing scientific advice that will allow more catch" (page 17 Table 1), and "Support for research intended to compete with or discredit NMFS scientists" (page 69) point to the opinion that examining questions in different ways are driven only by monetary gain, and that there should be no debate with the official (NMFS) view of the world.

This opinion is explicitly expressed in the discussion of recommendation 4, addressing the scallop surveys. Throughout the report there is the suggestion of a statistically rigorous (model-based) approach (page 70) to scallop surveys and assessment, resulting in a cooperative agreement that "recognizes the authority of the NMFS when it comes to expenditures." This effectively removes surveys conducted using different designs, yet it is arguable that the strength of the scientific information driving scallop management are these different surveys (dredge, drop-camera, hab-cam); when they produce similar estimates there is much more confidence in the stock estimate, when one differs, experiments are conducted to determine those differences resulting in increased understanding in the stock and the gear used to sample it. This is the power and benefit of repeatability, increased confidence in your scientific estimates. Based on my experience with reviews on our RSA proposals it is clear the NEFSC scientists already play a strong role in determining the direction of funding and research.

Finally I note that many of the benefits of the RSA program are not considered in this report, including the number of peer-reviewed primary papers produced, the number of new scientists trained in cooperative research, the opportunity for new individuals to spend time at sea to see if fishing is a possible career (this has happened extensively in the scallop RSA where a position on a vessel is limited by DAS restrictions), and the increased communication and trust between these new scientists and fishermen.

I hope you and the NEFMC will consider these comments in your deliberations. I appreciate the hard work put forth to create this report. Please contact me at the above address if I can provide any further information. My office phone number is (508) 910-6373, FAX (508) 910-6374 and my email address is kstokesbury@umassd.edu. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Kevin D. E. Stokesbury".

Kevin D. E. Stokesbury, Ph.D.
DFO Professor