



Massachusetts Lobstermen's Association

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Daniel McKiernan, Director
Massachusetts Division of Marine Fisheries
836 S Rodney French Blvd
New Bedford, MA 02744

RE: Proposed Commercial Surf Clam and Ocean Quahog Dredge Fishery Management Regulations

Director McKiernan,

The Massachusetts Lobstermen's Association (MLA), representing approximately 1,800 commercial lobstermen and women throughout the Commonwealth, respectfully submits the following comments regarding the proposed Commercial Surf Clam and Ocean Quahog Dredge Fishery Management Regulations. We appreciate the Commonwealth's efforts to modernize management of the commercial surf clam and ocean quahog dredge fishery and encourage the adoption of measures that align more closely with existing seasonal management areas and closure boundaries used under the Atlantic Large Whale Take Reduction Plan and other established fisheries management programs.

Established in 1963, the MLA is a member-driven organization that recognizes and supports the interdependence of species conservation and our members' collective economic interests. We continue to work diligently through the management process with the Division of Marine Fisheries, the Atlantic States Marine Fisheries Commission, and the New England Fishery Management Council to ensure the long-term sustainability and profitability of the resources our fishermen depend on.

The MLA supports the continuation and expansion of seasonal closure areas that have proven effective in reducing user conflicts, protecting important marine habitats, and safeguarding newly settled shell lobsters that are particularly vulnerable to disturbance from mobile bottom-tending gear.

Specifically, the MLA supports:

- Maintaining the existing closure area north of Point Allerton in Hull.
- Maintaining the existing seasonal closure off Manomet in southwestern Cape Cod Bay from **May 1 through October 15** to prevent conflicts among user groups and protect newly settled shell lobsters. The MLA further supports extending this closure eastward along the southern portion of Cape Cod Bay from Sandwich to Dennis, creating a more comprehensive and biologically meaningful protected area.

- Establishing a seasonal closure off Herring Cove from Race Point to Wood End from **May 1 through October 15**.

The MLA also requests that the State close the area off the backside of Cape Cod from Race Point south to Monomoy from **May 1 through October 15** to reduce additional gear conflicts and to expand the protection of vulnerable lobsters

Reduction of Gear Conflicts Between Fisheries

A key benefit of the proposed and expanded closure areas is the meaningful reduction in gear conflicts between the commercial lobster fishery and the surf clam and ocean quahog dredge fishery. These two fisheries operate in overlapping offshore and nearshore habitats, particularly during peak seasonal activity periods when both effort and resource sensitivity are at their highest.

Mobile dredge gear has the potential to interact with fixed lobster gear, resulting in gear damage, lost traps, reduced fishing efficiency, and unnecessary economic hardship for commercial lobstermen. Conversely, fixed-gear areas with high lobster trap density can also limit safe and efficient access for dredge operations. Establishing clearly defined seasonal separation zones helps reduce these interactions by spatially and temporally organizing fishing activity in a way that minimizes overlap during peak use periods.

By expanding and maintaining the proposed closures during the **May 1 through October 15** timeframe, the Commonwealth can significantly reduce the likelihood of gear conflict incidents, improve safety at sea, and promote more predictable access for both fisheries. This structured separation enhances operational efficiency for surf clam dredge vessels while protecting the investment and livelihood of fixed-gear lobster fishermen.

Rationale for the Proposed Closures

These areas are important to Massachusetts' lobster fishery and serve as valuable habitat for juvenile marine resources, including newly settled soft-shell lobsters. Seasonal closures during the warmer months provide additional protection during critical periods of growth and recruitment while minimizing gear conflicts between fixed-gear and mobile-gear fisheries. Extending and maintaining these closures will help preserve the long-term productivity of shared fishing grounds and promote coexistence among multiple fishing sectors.

The proposed closure periods are also consistent with existing seasonal management measures familiar to the fishing industry. Aligning closure boundaries and timing with other established fisheries management programs simplifies compliance, reduces confusion among fishermen, and enhances overall effectiveness.

Modern Monitoring and Enforcement

The MLA also believes that advances in fisheries monitoring technology make these seasonal closures more practical and enforceable than ever before. Modern vessel tracking systems, electronic monitoring tools, chart plotters, and geofencing technology allow fishermen and enforcement agencies to clearly identify closure boundaries in real time.

Geofencing systems can automatically alert vessel operators when approaching or entering restricted areas, reducing the likelihood of inadvertent violations. Likewise, vessel location data can provide regulators and enforcement personnel with efficient and accurate means of monitoring compliance without relying solely on traditional patrol efforts. These technologies improve transparency, support voluntary compliance, and create a level playing field for all participants in the fishery.

By incorporating closure areas that are clearly defined and compatible with modern navigation and monitoring systems, the Commonwealth can achieve conservation and conflict-reduction objectives while minimizing enforcement challenges and regulatory uncertainty.

Conclusion

The MLA supports maintaining the existing closure north of Point Allerton in Hull, maintaining and expanding the seasonal closure off Manomet eastward to Dennis from May 1 through October 15, and establishing a seasonal closure within Herring Cove from Race Point to Monomoy during the same period. These measures will help protect important lobster habitat, reduce user group conflicts, and support sustainable management of Massachusetts marine resources. They will also significantly reduce gear conflicts between the commercial lobster fishery and the surf clam and ocean quahog dredge fishery, promoting safer and more efficient operations for both sectors. Furthermore, the widespread availability of geofencing and vessel monitoring technologies provides regulators with effective tools to monitor and enforce these closures, making them both practical and achievable management measures.

The MLA appreciates the opportunity to provide comments and looks forward to continuing to work collaboratively with state managers to ensure the long-term sustainability of Massachusetts fisheries and coastal communities.

Respectfully submitted,

Beth Casoni

Executive Director