



Massachusetts Lobstermen's Association

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Submitted via: [Regulations.gov](https://www.regulations.gov)

Brian Fredieu, Office of Aquaculture
NOAA Fisheries, Attn: Aquaculture Opportunity Area
1315 East West Hwy.
Silver Spring, MD 20910

RE: NOAA-NMFS-2026-2179: Identifying Aquaculture Opportunity Areas in U.S. Waters

Dear Mr. Fredieu,

The Massachusetts Lobstermen's Association (MLA), representing ~1800 commercial lobster fishermen and fishing-dependent businesses throughout Massachusetts and the Northeast, respectfully submits these comments of concern regarding NOAA-NMFS-2026-2179: Identifying Aquaculture Opportunity Areas in U.S. Waters.

The MLA recognizes that the ocean is a multi-use environment and that aquaculture may provide economic and food-production benefits. However, new uses must not come at the expense of existing commercial fisheries.

Founded in 1963, the Massachusetts Lobstermen's Association is a member-driven organization representing approximately 1,800 fishermen and industry supporters throughout the Northeast, with members and stakeholders extending from Cape May, New Jersey, to Atlantic Canada. Our membership represents a broad range of commercial fishing interests and includes commercial lobstermen, charter and tuna fishermen, groundfishermen, aquaculture participants, and shoreside businesses.

Offshore aquaculture facilities can create a permanent or semi-permanent footprint on the seafloor, at the surface, and throughout the water column. Moorings, anchors, cages, longlines, and vertical lines can restrict where commercial fishermen can safely and effectively operate. In areas already supporting commercial fishing, this is not simply the addition of another ocean use—it can result in the loss of access to productive fishing grounds.

This concern is particularly significant for Massachusetts lobstermen. The lobster industry is being asked to reduce and modify vertical lines in the water column because of concerns regarding protected species and entanglement risk. The National Oceanic Atmospheric Administration (NOAA) should not simultaneously facilitate the introduction of additional vertical-line infrastructure through offshore aquaculture without evaluating the cumulative vertical-line footprint and applying consistent standards across all ocean users.

Displacement also carries substantial economic consequences. Fishermen forced to relocate may face longer steaming distances, higher fuel costs, additional gear conflicts, reduced fishing time,

lower catch, and increased safety risks. Those impacts extend beyond individual vessels to dealers, processors, gear suppliers, fuel providers, and other businesses in fishing-dependent communities.

Accordingly, NOAA should not identify or authorize Aquaculture Opportunity Areas (AOA) in productive commercial fishing grounds without first evaluating the full economic and operational consequences for existing fisheries and examining practicable alternatives. Where a new use would displace an existing fishery, NOAA should identify the affected users, quantify the resulting impacts, and establish appropriate mitigation or compensation mechanisms.

The fact that an area is physically suitable for aquaculture does not make it an unused or available area. Existing fishing activity, historical fishing patterns, economic dependence, and the ability of fishermen to relocate must be treated as fundamental siting considerations.

Question 1

New England (Maine through Connecticut).

New England should be considered because of its established seafood industry, working waterfronts, aquaculture experience, and seafood infrastructure. However, future AOAs must avoid or minimize conflicts with established commercial fisheries, particularly the lobster fishery.

Question 2

MLA recommends that NOAA initially evaluate ALL federal waters, while excluding areas of high commercial fishing activity.

NOAA should overlay fishing activity, lobster trap density, essential fish habitat, navigation routes, offshore energy areas, cables, and other ocean uses before identifying any AOA.

This is not an endorsement of any specific site. High-use lobster grounds, Stellwagen Bank, Georges Bank, and other important fishing areas should not be targeted for AOAs.

Question 3

Depth requirements depend on the type of aquaculture. For preliminary offshore screening, MLA recommends nothing to be deployed within active fishing grounds or where ANY whales have been seen or aggregate.

Question 4

NOAA should avoid areas that support significant or historically important commercial fishing activity, including lobster trap fishing and other fixed-gear fisheries. Fishing grounds should not be characterized as available simply because fishing activity is seasonal or does not occur uniformly across an area.

NOAA should evaluate fishing effort, seasonality, catch and revenue, port dependence, gear density, and the availability of practical alternative fishing grounds before considering such areas for aquaculture development.

Question 5

Commercial fishing should be treated as a primary ocean use when evaluating potential AOAs. NOAA should consider conflicts with lobster, groundfish, tuna, and other fisheries; recreational fishing; offshore wind; cables; shipping; conservation areas; and other existing or proposed activities.

Of particular concern is the cumulative effect of fixed infrastructure and vertical lines. The impacts of aquaculture infrastructure must be evaluated together with existing and proposed ocean uses rather than assessed in isolation.

Question 6

AOA size should be based on the area's cumulative environmental, navigational, biological, and socioeconomic carrying capacity—not simply on the amount of space that can physically accommodate aquaculture facilities.

The functional footprint must include the farm itself as well as moorings, anchors, vertical lines, safety zones, navigation buffers, maintenance areas, and other areas in which existing users may be restricted.

Question 7

NOAA should evaluate the vertical-line and fixed-gear requirements of proposed aquaculture systems as part of the overall vertical-line footprint in the region.

This is particularly important because commercial lobster fishermen are being required to reduce and modify vertical lines. Federal policy should apply consistent standards to all industries whose gear or infrastructure contributes to the vertical-line environment.

Question 8

NOAA should prioritize socioeconomic research quantifying the effects of displacement on existing fisheries, including increased steaming distance, fuel consumption, fishing time, catch, gear loss, safety, and impacts on fishing-dependent shoreside businesses.

Question 9

NOAA should incorporate comprehensive commercial fishing data into AOA planning, including fishing effort, seasonal activity, vessel activity, gear density, landings, revenue, port dependence, and other information demonstrating the economic importance of fishing grounds.

Spatial data should be evaluated not merely to determine where fishing occurs, but how important each area is to the businesses and communities that depend upon it.

Question 10

NOAA should recognize that existing commercial fisheries are not an "empty-space" use of the ocean. Fishing grounds represent established workplaces and economic assets that support fishermen and fishing-dependent communities.

Before designating an AOA, NOAA should demonstrate that the proposed site will not unnecessarily displace existing fisheries, that alternatives have been considered, and that affected fishermen will not be left to absorb the costs of accommodating a new industry.

One fishery should not displace another. New ocean uses should be accommodated through thoughtful siting, not by transferring the economic costs of development onto existing fishermen and fishing communities.

Thank you for the opportunity to comment.

Sincerely,

Beth Casoni

Executive Director