October 21, 2026

Michael Pentony
Regional Administrator
Greater Atlantic Regional Fisheries Office
NOAA Fisheries, U.S. Dept. of Commerce
55 Great Republic Drive
Gloucester, Massachusetts 01930

Via Email: Nmfs.gar.efp@noaa.gov

RE: Surf Clam EFP Economic Assessment

Dear Mr. Pentony:

On behalf of the Stellwagen Bank Charter Boat Association (SBCBA), Cape Cod Charter Boat Association (CCCBA) and Massachusetts Lobstermen Association (MLA) who represent the for hire and/or recreational fleet and commercial mobile hook and line and fixed gear types that fish within the Great South Channel Habitat Management Area ("GSCHMA") we offer the following comments associated with the above referenced EFP:

- The purpose of the GSCHMA is to protect complex seabed habitats that serve as critical habitat for juvenile cod and other groundfish species. The use of bottom trawls or dredges damage the seafloor and the ecosystem. The proposed EFP is to be conducted at the Rose and Crown and Davis Bank east exemption areas. Surf clam and mussel dredge exemptions areas include McBlair, Fishing Rip and Old South located within the GSCHMA.
- There is presently two recent or ongoing EFPs being conducted in the research designated areas associated with the GSCHMA by the Cape Cod Commercial Fishing Alliance and the Coonamessett Farm Association. Gear conflict has occurred between the recreational and commercial gear types associated with select EFP activities. The recent or ongoing EFPs support scientific research data collection and development of new management measures but the proposed EFP does not appear to support such objectives.
- The GSCHMA is a diverse ecosystem resulting from the prohibition of bottom trawls or dredges that needs to be maintained, the result of such protections are evident by the recreational and commercial fleet. Based on our observations there is no doubt that this area

is an Atlantic cod spawning area and there is no lack of Atlantic cod, especially in the fall in this area with increased numbers since the closure.

- The biodiversity of this area facilitated by the prohibition of bottom trawls or dredges have benefited Atlantic cod and the wide array of groundfish and pelagics (haddock, pollack, sharks, tuna, fluke, mackerel, black sea bass etc.) that have historically been found in this area or more recently increased number of southerly species competing with historical residents.
- The subject area is a cod and Atlantic herring spawning area, essential cod habitat and well as habitat for wide array of species that is subject to a changing environment associated with the cold water pool and climatic shift of fishery stocks. Considering the poor status of the Atlantic cod stock and Atlantic sea herring and changing environmental conditions, opening an area to bottom trawls or dredges is not recommended due to the potential detrimental impact to Atlantic cod, Atlantic herring and other fish and the ecosystem within this area.

Ultimately, we cannot support the proposed EFP. If you have any questions, please contact us at the email address below.

Sincerely

Capt. Tim Brady

Capt. Tim Brady
SBCBA, Vice President
sbcbamp@gmail.com

Capt. Willy Hatch

Capt. Willy Hatch
CCCBA, President
machacafishing@gmail.com

Beth Casoni

Beth Casoni
Executive Director, Massachusetts Lobstermen Association
beth.casoni@lobstermen.com

Cc: Cate O'Keefe, NEFMC
Chris Moore, MAFMC
Melissa Smith, NEFMC Habitat Committee
Terry Alexander, NEFMC Groundfish Committee
Frank Blount, NEFMC RAP
Travis Ford, GARFO
Russ Dunn, GAFFO
Tom O'Shea, MADF&W
Dan McKiernan, MassDMF