



New England Fishery Management Council

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Daniel Salerno, *Chair* | Cate O'Keefe, PhD, *Executive Director*

June 1, 2026

Mr. Michael Pentony
Regional Administrator
NOAA Fishery Service
Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, MA 01930

Re: Great South Channel Habitat Management Area Surfclam Compensation Fishing EFP

Dear Mike:

Please accept these comments on behalf of the New England Fishery Management Council regarding the potential adjustment of an Exempted Fishing Permit (EFP) issued to Coonamessett Farm Foundation (CFF). In this instance, considering the objectives of the project are relevant to ongoing and future Council decisions and research objectives identified for the Great South Channel Habitat Management Area, and that the project is nearing completion, we think that the benefits of continuing the research outweigh the negative habitat impacts that will result from the additional 64 compensation fishing trips. Therefore, we support authorizing an additional 64 compensation trips to be taken in either the Rose and Crown or the Davis Bank East areas, as defined by the coordinates in the May 22, 2026, FR notice. We would also support any requested time extension should the trips not be taken by September 30th, provided that the final report from the project is available over the summer as previously planned.

GARFO's May 22 proposal would allow CFF and their partner fishing vessels to complete 64 additional compensation trips within portions of two areas, Davis Bank East and Rose and Crown (91 FR 30288). The May 22 FR notice indicates that additional, minor modifications to the EFP could be requested and authorized without further public notice. As for prior fishing authorizations under this EFP, each trip would occur over one to two days and is expected to require around 30 tows to harvest up to 14 cages of surfclams. The proposed extension would bring the total trips authorized under this EFP to 350. Prior authorizations and extensions are summarized below:

- Via the initial EFP issued on May 24, 2024, GARFO authorized 260 compensation fishing trips to be taken in the Davis Bank East area only.
- During August 2025, GARFO modified the EFP to allow compensation fishing trips to be completed in the Rose and Crown area as well, with an extension for completion of March 31, 2026. No additional trips were authorized beyond the original 260 trips. The extension was granted to allow for additional harvest opportunities.
- On April 24, 2026, GARFO authorized 26 additional trips (i.e., 286 trips total) to be taken in either of the Davis Bank East or Rose and Crown areas, with an extension for completion of July 15, 2026. The extension was granted to allow for additional harvest opportunities to pay for the final acoustic survey work.

The Council has an interest in this project since the compensation fishing and research areas are located within the Great South Channel Habitat Management Area (HMA), which was established when the Council's Omnibus Habitat Amendment 2 (OHA2) was implemented in April 2018. The research areas were established via the Clam Dredge Framework which was implemented in June 2020. The research conducted under this EFP helps address some of the [research objectives](#) identified following final Council action on the Clam Dredge Framework. The Council commented on an earlier adjustment to this EFP-based project in [July 2025](#) and commented on the original EFP in [April 2024](#). In our 2025 letter, we supported expanding the potential compensation fishing area and extending the timeframe for completing the 260 trips authorized originally under the EFP.

In general, the Council recommends a cautious approach to authorizing fishing within areas where such activities would normally be restricted to minimize the impacts of fishing on habitats (see these [October 2022](#) comments). However, we have previously recognized that compensation fishing is an important source of funding for research projects, including within the Great South Channel Habitat Management Area (see October 2022 comments). Without such funding, important research on habitat types and susceptibility to fishing may not be possible in this area. Compensation fishing also generates revenue for participating fishing businesses.

During 2026, the Council is evaluating the Great South Channel Habitat Management Area surfclam dredge exemption program, focusing on the three designated exemption areas, McBlair, Old South, and Fishing Rip. We have spoken to staff at CFF and understand that the final report from this EFP will be completed in July, regardless of any compensation fishing trip additions and time extensions, since the final optical habitat survey was conducted in May. The Council would benefit from receiving the project report in a timely manner to support our exemption program review, and to support any future decisions about whether to reconsider the exemption program structure within the Great South Channel Habitat Management Area. The Council may also benefit from understanding any anecdotal information regarding compensation fishing performance in the Davis Bank East or Rose and Crown areas as it pertains to resource availability, even if these trips are completed following submission of the final report.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Cate O'Keefe".

Cate O'Keefe
Executive Director