



New England Fishery Management Council

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John F. Quinn, J.D., Ph.D., *Chairman* | Thomas A. Nies, *Executive Director*

DRAFT

Michael Pentony
Regional Administrator
Greater Atlantic Regional Fisheries Office
55 Great Republic Dr.
Gloucester, MA 01930

Dear Mr. Pentony,

Thank you for your August 23 letter requesting our feedback on Domenic Santoro's Exempted Fishing Permit (EFP) proposal for the Great South Channel Habitat Management Area. This issue was discussed at the Habitat Committee meeting on August 28 and at the Council meeting on September 27.

We have reviewed Mr. Santoro's proposal as presented in his June 29 letter to you. As we understand it, the intent of the study is to identify the distribution, areal extent, and density of blue mussel beds in the Great South Channel Habitat Management Area (HMA) using a traditional mussel dredge. As described in Mr. Santoro's June letter, "the long-term objective would be to establish a mussel dredge exemption within the HMA".

Mr. Santoro wishes to sample the entire HMA, aside from the northeastern corner permanently closed to all mobile bottom-tending gear. We recommend that the area fishable under the EFP be limited to those areas where hydraulic clam dredge exemptions are designated by the Council in the framework action currently under development. Our intent is to take final action on the framework at our December 4-6, 2018 meeting. We recommend that fishing under the EFP be delayed until the Council takes final action. We do not think it necessary to wait for publication of the final rule.

In addition to timing and location issues, we have discussed other elements of the study. We recommend that a scientifically rigorous sampling strategy be used, perhaps a stratified random sampling design, or a gridded design. We also recommend that scientific personnel participate in the fishing to document non-mussel species in the catch. In particular, we think it is essential to enumerate and account for any groundfish bycatch, and the agency may wish to consider a provision that rescinds the EFP if excessive groundfish bycatch occurs in relation to annual catch limits. We suggest that the final report for the project include a discussion of the economics of the fishery, and how access to the beds in Nantucket Shoals would affect the fishery's economics. In addition to sampling with mussel dredges, it would be useful to have other types of seafloor observations, including video or still camera footage as well as acoustic mapping of the beds.

We expect to continue a discussion of these issues during the remainder of the development of the framework and will forward any additional recommendations that are developed.

Sincerely,

John Quinn
Chairman