

# CORRESPONDENCE

**From:** NOAA Fisheries Greater Atlantic Region  
[garfo.noaafisheries@public.govdelivery.com](mailto:garfo.noaafisheries@public.govdelivery.com)  
**Sent:** Tuesday, December 2, 2025 11:08 AM  
**To:** Cate O'Keefe <[cokeefe@nefmc.org](mailto:cokeefe@nefmc.org)>  
**Subject:** NOAA Fisheries Re-Opens Comment Period on Restoring American Seafood Competitiveness

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**December 2, 2025**

## **NOAA Fisheries Re-Opens Comment Period on Restoring American Seafood Competitiveness**

NOAA Fisheries is announcing that the public comment period on Regulatory Reform, Seafood Industry Challenges, and Innovative Approaches in Response to the Executive Order Restoring American Seafood Competitiveness is reopened from December 1, 2025 to December 15, 2025. Comments must be received by 11:59 p.m. EDT on December 15, 2025.

**Specifically, we are looking for input on the following issues:**

- Regulations that govern fishing activities that may be suspended, revised, or rescinded

- Challenges specific fisheries are facing, suggestions for innovative improvements, and examples of existing federal fishery regulations that could be modified to enhance U.S. fishing businesses
- Ways to improve fisheries management and science:
  - How can less expensive and more reliable technologies and cooperative research be used to support fisheries assessments?
  - How can NOAA Fisheries improve and modernize how it collects and uses data so federal fishery regulations better reflect what's happening on the water right now?
  - What types of data, tools, or information do U.S. fishing businesses need most to deal with changing economic and/or environmental conditions and keep fishing? How can NOAA Fisheries best support the development and use of these resources?
- How to expand exempted fishing permit programs to promote fishing opportunities nationwide

Public comments will be used to help identify specific actions we can take as we launch a bold, coordinated effort to revitalize the U.S. seafood sector. The effort underscores our commitment to addressing the recent decline in fisheries landings and revenue, boosting sustainable aquaculture, reducing the seafood trade deficit, and strengthening supply chain resilience.

Additionally, NOAA Fisheries will host a public listening session to receive public comments on Monday, December 8 from 4:00-5:00 p.m. ET. [Online registration](#) is now available.

More information about the opportunity for public comment is available on the [Federal Register](#) and the [NOAA Fisheries website](#).

## **Questions?**

Media: Contact [NOAA Fisheries Public Affairs](#)



New England Fishery Management Council

50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492  
Daniel Salerno, Chair | Cate O'Keefe, PhD, Executive Director

December 5, 2025

Mr. Michael Pentony  
GARFO Regional Administrator  
NMFS/NOAA Fisheries  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Mike:

In accordance with provisions of the Magnuson-Stevens Act, I reviewed the draft regulatory text for Amendment 25 Revised (A25 Revised) to the Northeast Multispecies (Groundfish) Fishery Management Plan (FMP) to deem whether it is consistent with the action's text and the Council's intent. The review was based on the draft regulatory text provided to the Council Chair and staff by email on November 26 and December 4, 2025. The review focused on the regulatory changes resulting from A25 Revised under the assumption that the proposed regulations in Framework Adjustment 69 (FW69) are approved and implemented prior to the implementation of A25 Revised.

I deem the regulatory text in the enclosure consistent with Council intent for implementing measures proposed by A25 Revised.

Please feel free to call me with any concerns.

Sincerely,

Daniel Salerno  
Council Chair



The Commonwealth of Massachusetts  
**Division of Marine Fisheries**  
(617) 626-1520 | [mass.gov/MarineFisheries](http://mass.gov/MarineFisheries)



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*Lt. Governor*

Rebecca L. Tepper  
*Secretary*

Thomas K. O'Shea  
*Commissioner*

Daniel J. McKiernan  
*Director*

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December 19, 2025

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

ATTN: Liz Sullivan, Fishery Policy Analyst

**RE: NOAA-NMFS-2025-0004 – Comments on Proposed Rule for Northeast Multispecies Fishery Framework Adjustment 69**

The Massachusetts Division of Marine Fisheries (MADMF) is submitting comments in response to the proposed rule to implement fishery specifications and management measures in Framework Adjustment 69 (FW69) to the Northeast Multispecies Fishery Management Plan for Fishing Years (FY) 2025-2027 for multispecies stocks except those specific to Atlantic cod (NOAA-NMFS-2025-0004). MADMF supports the FW69 proposed rule which reflects the New England Fishery Management Council's (Council) preferences to:

- Set the shared U.S./Canada quotas for Georges Bank (GB) yellowtail flounder for FY 2025 and 2026 and eastern GB haddock for FY 2025
- Set specifications, including catch limits for seven groundfish stocks: Gulf of Maine (GOM) haddock, American plaice, witch flounder, pollock, and Atlantic halibut for FY 2025-2027; GB yellowtail flounder for FY 2025-2026; and GB haddock for FY 2025
- Remove a requirement for sectors to submit State and Federal permit information to NMFS
- Modify the catch threshold for implementing the Atlantic sea scallop fishery's Accountability Measures for GB yellowtail flounder and northern windowpane flounder

MADMF also supports NOAA Fisheries proposed inclusion of regulatory changes and other measures that were not part of FW69 but necessary for expediency in carrying out FW69, including to:

- Approve sector operations plans and allocate quota to sectors
- Remove a requirement for weekly reporting by sectors
- Set recreational management measures for GOM cod and GOM haddock
- Update common pool possession and trip limits for stocks to reflect potential FY 2025 limits
- Revise existing regulatory text to correct and improve clarity of existing regulations

MADMF stresses the importance of expeditious implementation of FW69 now that a proposed rule has been published. The Council took final action on FW69 back in December 2024, and the action was submitted to NOAA Fisheries in March 2025. The groundfish fishery is currently operating by emergency rule issued by NOAA Fisheries on May 1, 2025, and extended on October 3, 2025. The unprecedented delay of FW69 approval has impacted industry's ability in Fishing Year 2025 to plan trips, maintain crews, and align with market demand, and has prevented the opportunity for industry to take advantage of an increase in allocation in Gulf of Maine haddock and several flatfish stocks.

### Transboundary Resources

The proposed FW69 includes measures to set quota for shared U.S./Canada stocks. Historically, stock assessments for Eastern Georges Bank stocks were developed through the Transboundary Resources Assessment Committee (TRAC) process. For 2024 Transboundary Management Guidance Committee (TMGC) decision-making, the TRAC process was dissolved and the process shifted to a new approach to apportion total Georges Bank domestic assessment advice to the eastern GB management unit for Atlantic cod and haddock. Industry representatives have raised concern with the consistency and stability of the new biomass apportionment method as advice can significantly impact domestic quotas available to the offshore groundfish fleet. For example, in 2024, the 100% apportionment of the full GB haddock stock to the eastern area and 0% to the western area of GB resulted in the 78% decrease in U.S. quota for eastern GB haddock from 2024 to 2025 (7,058 to 1,556 mt) in FW69 measures.

For 2025 TMGC deliberations, the Northeast Fisheries Science Center (NEFSC) revised the biomass apportionment methods for haddock to fully align the apportionment with the survey footprint used in the haddock assessment. Georges Bank haddock stock apportioned to the eastern area of GB changed from 100% to 75%, with 25% apportioned to the western area of GB. This difference resulted in a 184% increase in the U.S. GB haddock allocation recommended for 2026 (4,425 mt, draft Framework 72). Acknowledging these extreme fluctuations, the Council has committed to revisiting the biomass apportionment methodology for U.S/Canada transboundary stocks of cod and haddock in 2026; MADMF supports these efforts and encourages the full support of NOAA to further improve not just the apportionment method but the overall TMGC process.

### Management Uncertainty Buffers and At-Sea Monitoring

MADMF understands that NMFS is currently evaluating whether the preliminary at-sea monitoring (ASM) coverage target of 100% (announced on March 21, 2025) can be met given the level of 2025 appropriations funding for reimbursing sectors for the cost of monitoring. An ASM coverage target less than 100% would result in lower quotas due to application of management uncertainty buffers (ASM coverage less than 90% for white hake pending approval of FW66). It is critical that NMFS do all it can to prioritize funding a 100% ASM coverage target.

ASM coverage and costs are significant factors in the fishery's ongoing viability and another reason why implementation of FW69 is critically important. The delay in and repackaging of FW69 and Amendment 25 has caused several other groundfish management priorities to be paused, including review of the Amendment 23 monitoring program that established ASM. MADMF urges NOAA Fisheries to move forward with approval of Amendment 25 (Revised) which was submitted to GARFO by the Council on November 14, 2025. The Council developed FW69 in connection with Amendment

25. Amendment 25 is necessary to advance the Council's multi-year Atlantic Cod Management Transition Plan for aligning management with best available science. I appreciate the opportunity to comment and look forward to engaging with NOAA Fisheries on these important issues moving forward.

Cc: Cate O'Keeffe, NEFMC

Daniel J. McKiernan  
Director



Sincerely,



December 19, 2025

Mr. Eugenio Piñeiro-Soler  
Assistant Administrator for Fisheries  
NOAA Fisheries Service  
U.S. Department of Commerce  
1315 East-West Highway  
Silver Spring, MD 20910

Re: NSC Public Comments on the Proposed Rule for Framework Adjustment 69, Northeast Multispecies Fishery Management Plan. Docket No. 251118-0171 RIN 0684-BN23

Dear Mr. Piñeiro-Soler,

The Northeast Seafood Coalition (NSC) appreciates the opportunity to offer our comments on the Proposed Rule for Framework Adjustment 69 to the Northeast Multispecies Fishery Management Plan.

Founded in 2002, NSC is a non-profit membership organization that represents commercial fishing businesses in the scientific, policy, and legislative processes. NSC's members encompass the full diversity of small family-owned and operated businesses that participate in the federal Northeast multispecies (groundfish) fishery. NSC members hail from ports across the Northeast, utilize all groundfish gear types and fish on small, medium, or large platforms. NSC fishing members are enrolled under the groundfish sector management program.

**Overfishing Limits and Acceptable Biological Catches:**

*Georges Bank haddock:*

NSC strongly supports an in-season adjustment to the United States Georges Bank (GB) haddock ABC for the remainder of the 2025 fishing year.

Recommendation:

NSC recommends an increase to the 0 mt US GB West haddock management unit based on a formulaic approach that recognizes the following:

- The US OFL of 8,034 mt

- The Total ABC of 7,410 mt available in 2025 and used in the emergency action and TMGC negotiations in 2024.
- 5,854 mt Canadian catch target as a result of the Northeast Fishery Science Center (NEFSC) Biomass Apportionment Method delivered to the TMGC for 2024 negotiations and the country allocation shares for 2025.
- The 2024 Biomass Apportionment Method did not incorporate all of the survey strata that informed the total biomass for the GB haddock stock assessment. The 2024 method omitted most, if not all, of the survey strata where US catches occur. This resulted in a 0% West and 100% East biomass distribution for this 2025 fishing year. The -78% change in quota from 2024 to 2025 fishing years was most notably due to this “temporary” biomass apportionment approach.
- The revised resource apportionment methodology that was used for TMGC negotiations for the 2026 fishing year resulted in a 25% West and 75% East biomass distribution. The revised 2026 methodology now incorporates the survey strata used to inform the US 2024 Management Track assessment for the GB haddock stock. NSC continues to have concerns with the biomass apportionment methodology and strongly recommends this important issue be reexamined in a diligent and transparent effort. The consequences are significant to the US commercial fishery.

Recognizing the limited opportunity to mitigate the damage to the US fishery that has already occurred since the start of the fishing year on May 1st, NSC recommends the following approach:

1. Nearly 3 quarters of the fishing year will have passed before Framework 69 is implemented. For this reason we recommend applying 1/4<sup>th</sup> of what should have been a 25% apportionment to Western GB (6.25%) to the 7,410 Total ABC = 463 mt.
2. Increase the US ABC for GB haddock from 1,556 with an in-season adjustment of an additional 463 mt (total 2,019 mt). The 463 mt would be applied to the US Western Management Area.
3. The resulting values would increase the Total ABC from 7,410 to 7,873 mt which is below the US OFL of 8,034 mt. The western management area would be increased from 0 to 463mt and the eastern management area would remain unchanged.

This small increase remains below the OFL and will help to mitigate the profound impacts the 2024 biomass apportionment methodology and prescribed 2025 ABC is having on the US fishery now.

#### Discussion:

Since the fall of 2024, NSC has submitted multiple oral and written comments on the issues surrounding the Georges Bank haddock assessment and the newly constructed biomass distribution under the US/Canada Sharing Understanding. NSC is resubmitting these comments under this Framework 69 proposed rule (see attached). NSC continues to have serious concern with the science and process surrounding the 2024 GB haddock management track assessment

which ran contrary to the Advisory Oversight Panel and research track assessment recommendations.

NSC was informed during the 2024 TMGC negotiations and the Framework 69 process that there wasn't enough time in the process to address the apportionment issues that NSC clearly identified. The apportionment method used a small subset of the survey area that was used to inform the GB haddock stock assessment and it omitted nearly all of the survey strata that contained the historical and recent commercial catches. Also, NSC was informed there wasn't time to address the serious scaling issues surrounding the GB haddock stock assessment without delaying the opening of the fishery for 2025.

This has been a costly and unnecessary experience for the US commercial fishery. The GB haddock ABC, combined with the low cod quotas and Emergency Action measures on GOM haddock and witch flounder, have greatly altered fishing performance and the economic profitability of the entire commercial fishery this year.

Catch Limits for Fishing years 2025-2027:

Framework 69 contains critical increases in catch limits for stocks like Gulf of Maine haddock and witch flounder, two stocks that have been highly constraining to commercial fishing operations and the groundfish sector program for years. NSC is fully supportive of the specifications for these highly utilized stocks that received assessment updates in 2024. It has cost the commercial groundfish fishery millions of dollars by not including these increases under the Emergency Action measures.

Sector Reporting Requirements:

NSC supports NMFS's proposed changes to the sector reporting requirements.

NSC appreciates the opportunity to offer our comments.

Sincerely,



Vito Giacalone  
Policy Director

Cc: Dr. Cate O'Keefe, Executive Director, New England Fishery Management Council  
Dr. Conor McManus, Chair, Scientific and Statistical Committee, New England Fishery Management Council  
Michael Pentony, Regional Administrator, Greater Atlantic Regional Office, NOAA Fisheries



Michael Pentony  
GARFO Regional Administrator  
NMFS/NOAA Fisheries  
55 Great Republic Drive  
Gloucester, MA 01930

January 7, 2026

Liz Sullivan  
Fishery Policy Analyst,  
GARFO/NMFS/NOAA Fisheries  
55 Great Republic Drive  
Gloucester, MA 01930

*Submitted via regulations.gov*

Re: Comments on Framework 69 proposed rule for Northeast Multispecies Fisheries Management Plan (Groundfish Plan) (NOAA-NMFS-2025-0004)

Dear Mr. Pentony,

Conservation Law Foundation (CLF) submits the following comments on the *Northeast Groundfish Fishery Management Plan Framework 69 Proposed Rule*.<sup>1</sup> CLF supports the adoption of the negotiated US/Canada quota for Georges Bank (GB) yellowtail for fishing year 2025 & 2026, and the specifications for Gulf of Maine (GOM) haddock, American plaice, witch flounder, pollock and Atlantic halibut, and GB yellowtail for fishing year 2025-2027, and GB haddock for fishing year 2025 as proposed in Framework 69. CLF opposes increasing GB haddock because NOAA has not provided the rigorous analysis necessary to justify departing from the Scientific and Statistical Committee (SSC) recommendation. CLF also opposes modifications to the secondary catch threshold for the scallop fishery accountability measures (AMs) for GB yellowtail and northern windowpane flounders.

Founded in 1966, CLF is a non-profit, member-supported organization with offices located in Massachusetts, Rhode Island, Maine, New Hampshire, Vermont, and Connecticut. CLF uses the law, economics, science, and policy to design and implement strategies that conserve natural resources, protect public health, and promote thriving, resilient communities in our region. CLF and its members are dedicated to the protection of the marine ecosystem in the Northeast and the coastal communities that rely upon it. CLF has a decades-long history of

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<sup>1</sup> Proposed Rule, 90 Fed. Reg. 56836 (Dec 8, 2025).

advocating for conservation and management measures necessary to recover groundfish populations to healthy sustainable levels.

*NOAA failed to provide a reasoned explanation for its delay in publishing Framework 69.*

The Magnuson-Stevens Act (MSA) requires the Secretary of Commerce to immediately evaluate proposed regulations for consistency with fishery management plans and applicable laws upon receipt from the Council.<sup>2</sup> The Secretary must then make a determination within 15 days<sup>3</sup> and, if consistent, publish the regulations in the Federal Register for a public comment period of 15 to 60 days.<sup>4</sup>

Framework 69 was submitted to the Secretary on March 11, 2025, just six days after Amendment 25 was transmitted (March 5, 2025), yet it did not publish until December 8, 2025. NOAA has offered no credible reason why these actions could not have been published concurrently, in accordance with MSA timelines and Council's intentions, much less the 272-day delay in publishing Framework 69. Even when one considers the government shutdown and the additional work created by choosing not to publish Framework 69 alongside Amendment 25, it remains difficult to understand why the Agency allowed more than 60% of the fishing year to pass without implementing the management measures contained in this Framework. These failures most likely have resulted in overfishing of certain Atlantic cod stocks such as Southern New England cod, probable overages in fishing year 2025 of Atlantic halibut, and overall disruption and uncertainty in the groundfish fishery.

*NOAA should promptly approve all OFLs, ABCs, and US/Canada quotas, as proposed in Framework 69.*

CLF supports approval of the Overfishing Limits (OFL), Acceptable Biological Catch (ABC), and US/Canada quotas as proposed by the Council in this action. The Council's SSC reviewed and provided these recommendations based on the best available science.

On the other hand, we do not support deviating from SSC advice for GB haddock. See proposed rule seeking comments on whether the U.S. ABC should be increased above the recommended 1,556 mt.<sup>5</sup> The proposed rule provides no meaningful analysis or documentation of whether such an increase would risk overfishing, trigger a pound for pound payback with Canada, compromise U.S. co-management responsibilities for shared stocks, or offer any real

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<sup>2</sup> 16 U.S.C. §1854(b)(1).

<sup>3</sup> *Id.*

<sup>4</sup> 16 U.S.C. §1854(b)(1)(A).

<sup>5</sup> 90 Fed. Reg. at 56840.

benefit this late in the fishing year. Without additional information that ensures the resource will not be at risk of overfishing and that the short-term gains would not result in long-term harm to the stock or shared management obligations, this would be short-sited. NOAA has a statutory obligation to fully analyze and vet all biological, ecological, and management implications<sup>6</sup> before making such decisions, and NOAA cannot lawfully justify increasing the ABC based solely on economic considerations.<sup>7</sup>

*NOAA should disapprove removing the second catch threshold for GB yellowtail and northern windowpane flounders.*

Rebuilding depleted groundfish stocks is essential to restoring a sustainable and resilient groundfish fishery, making it especially concerning that chronic scallop fishery overages of GB yellowtail and northern windowpane flounders clearly document that existing AMs are failing to prevent or correct repeated exceedances. For this reason, CLF opposes permanently removing the second catch threshold, as doing so would further weaken safeguards meant to limit bycatch, reduce the fishery's accountability for persistent overages, and undermine efforts to protect vulnerable flatfish stocks. The proposed rule acknowledges the scallop fishery “substantially exceeded its sub-ACL for northern windowpane in 2023”<sup>8</sup> and has continued to do so in subsequent years even with AMs in place. AMs are intended to prevent ACLs and sub-ACLs from being exceeded and to correct or mitigate overages as quickly as possible.<sup>9</sup> Yet, the current reactive AMs have clearly failed to reduce the scallop fishery’s catch of northern windowpane flounder. NOAA should disapprove the removal of the second catch threshold and instead direct the Council to prioritize more effective solutions, including year-round gear modifications and revised time/area closures, to address and correct the conditions causing these persistent overages.

*Conclusion.*

NOAA must do more to ensure that all rulemaking occurs in a timely manner so that fisheries have the most up-to-date, scientifically supported measures in place. Delays and deviations from science-based recommendations jeopardize sustainable fisheries management and erode confidence in the integrity of the process. These delays have already resulted in critical cod measures in Amendment 25 and Framework 69 being postponed, directly failing the resource. NOAA must act immediately by publishing and implementing the repackaged

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<sup>6</sup> 16 U.S.C. §1851(a)(1-2).

<sup>7</sup> 16 U.S.C. §1851(a)(5) (2025); 50 C.F.R. § 600.330 (a).

<sup>8</sup> 90 Fed. Register 56,861 (Dec. 8, 2025).

<sup>9</sup> *Id.*



Amendment 25 to support overdue rebuilding efforts. Further, we are increasingly concerned that the Council processes designed to safeguard and sustainably manage marine resources are being undermined. To that end, NOAA should approve all Framework 69 US/Canada quotas and catch limits as proposed and disapprove the revisions to the scallop AMs catch thresholds. NOAA should not adjust the GB haddock U.S. ABC without thorough analysis of the biological and ecological implications on the resource and its short- and long-term management with Canada.

Sincerely,

Elizabeth “Libby” Etrie,  
Director Ocean Policy, Ocean Program

Dr. Gareth Lawson,  
Senior Scientist, Ocean Program

Erica Fuller,  
Senior Counsel, Ocean Program

CC: New England Fishery Management Council

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## NEW ENGLAND/MID-ATLANTIC

NOAA  
FISHERIES

January 12, 2026

# NOTICE On-Demand (Ropeless) Lobster and Jonah Crab Gear Testing in Waters off of Massachusetts and Rhode Island from February 1 - April 30.

Research Area: Commercial lobstermen working with the Northeast Fisheries Science Center will deploy fully on-demand (ropeless) fishing gear between February 1 and April 30, 2026, with possible extension into May in state waters north of Cape Cod. The following information is provided to help avoid gear conflict. ***The on-demand fixed gear will not be visible at the surface since it has no surface buoys.***

Participating vessels will fish trap trawls within a subset of the [South Island Restricted Area](#) and the [Massachusetts Restricted Area](#) when lobster fishing using traditional vertical lines is restricted. These “Testing Zones” are hatched in the chart below. Research is prohibited in Cape Cod Bay. Vessels conducting this research will be flying the gold flag shown below.



Map 1: Chart showing where on-demand trawls will be fished. Research gear will be deployed in a subset of the restricted areas, as shown in hatched areas in the chart above.

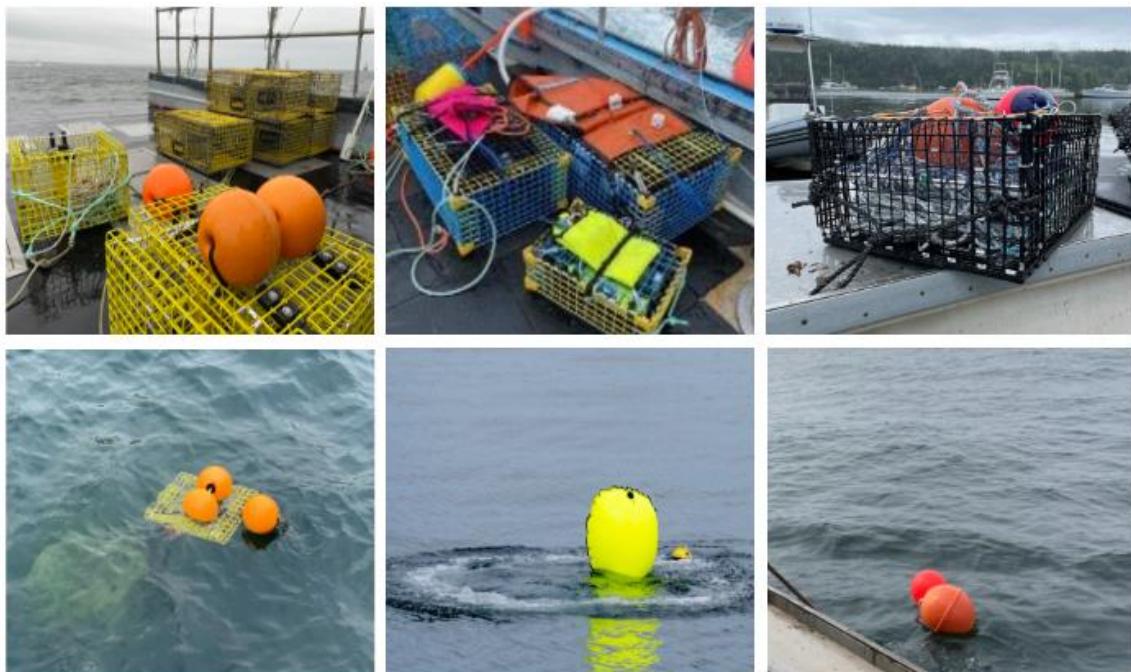


Vessels participating in this research during the Restricted Area seasons will be flying this flag.

Avoiding Gear Conflict: On-demand research gear will be moved ahead of the Northern Gulf of Maine Scallop Management Area opening on April 1 to avoid areas of typical scalloping activity. On-demand fishing is prohibited in Cape Cod Bay and Nantucket Sound.

Research gear will not be surface marked, but will be marked digitally and can be viewed using the free EarthRanger Buoy app (via [Google Play](#) or [Apple App Store](#)) or select chartplotters. [TimeZero](#) users can view gear positions by turning on the experimental feature in version 5. [Olex](#) users can purchase an update to add this functionality. Stable internet is needed to view nearby gear positions in real-time. Those without internet at sea can use the EarthRanger Buoy app to download gear positions before leaving the dock. Stored positions will display when within a 5-mile radius, but will not reflect changes made after the download. Contact us to learn more, including about funding opportunities to purchase gear visualization technology. MA fishermen can also reach out to the Division of Marine Fisheries to discuss their on-demand gear research grant program.

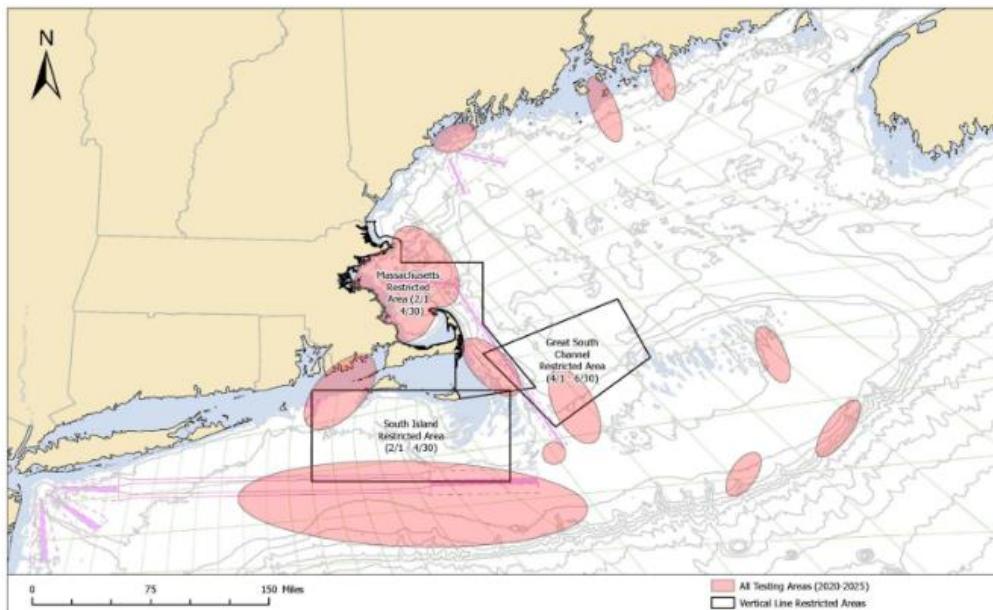
***If you accidentally tow up an on-demand device*** please mark the location and contact the NEFSC Gear Research Team at [nec.gearlibrary@noaa.gov](mailto:nec.gearlibrary@noaa.gov) or (508) 495-2000.



Top Row: Images of submersible on-demand units on deck. Bottom Row: Images of on-demand units on the surface.

On-Demand testing is year-round: Be aware that outside of the Restricted Area season, on-demand gear is being tested year-round by approximately 50 NEFSC collaborating vessels across New England. The gear is fished in hybrid configurations, with standard surface gear on one end and on-demand gear on the other end. Maine Department of

Marine Resources and Massachusetts Division of Marine Fisheries are also operating on-demand gear trials.



## Questions?

For more information, please contact the Gear Research Team at:  
[nec.gearlibrary@noaa.gov](mailto:nec.gearlibrary@noaa.gov) or (508) 495-2000.

**From:** Tim Tower <sowhake@gmail.com>  
**Sent:** Wednesday, January 14, 2026 11:10 AM  
**To:** comments <comments@nefmc.org>  
**Subject:** Proposal as a Potential Motion from a Member of the RAP in Absentia Jan 20, '26 Meet

Council Chair; Daniel Salerno & Executive Director; Cate O'Keefe:

This is Tim Tower; I hold a seat on the Council's Recreational Advisory Panel. I have owned and run a successful party/charter business since 1975.

I had already booked flights and made reservations for a trip to the UK weeks before the RAP meeting was scheduled for January 20, 2026. I really regret missing this meeting. And there is a slim chance I might be able to attend via Zoom. We shall see.

In the meantime, I want to make my feelings known in regard to the potential fiscal 2026 Western Gulf of Maine fishing regulations. If I were to make a motion to be carried forward to the Groundfish Committee today, I would not include a May cod season. The regulation I would push forward for the take of cod/haddock in the WGOM would include the two month cod season of September & October with a bag limit of one cod/angler with a minimum legal overall length of 23" and include the current haddock season in place now. I would drop the haddock minimum size from 18", the length limit now, to 17". Last January, I made the motion that was accepted by the Groundfish Committee, the full Council and the Service. That regulation proposal included a May cod season. I don't think this is a good idea, as much as I did then. These proposed regulations of last January were never implemented for fiscal fishing year 2025.

I remain very uneasy about a May cod season, despite the fact that the new model tool supports it:

1. We have had no cod catch data to be added as part of the data set for the model tool we are using with respect to May since 2014. Since then, cod fishing has plummeted in the GOM.
2. I am very reluctant to come up with a model, based on this, that supports taking cod during the start of spawning season (May).
3. We haven't seen anywhere near the cod we saw ten years before and my observations show a decrease in the cod catch every year since, the 2025 season being the worst year I have seen in fifty-four years of keeping track.

4. There is no way to measure the spawning disruption caused by anglers targeting cod where they spawn. These spots are specific spots that remain for, sometimes, months where these individuals congregate - cod seek out these spots to spawn.

If by keeping cod in May regulators find that this wasn't a good thing it could impact the number of haddock (and cod) we could keep in following years. And I'm not willing to take that chance. If we have any hope of recreational participation stability, I don't think it can include taking cod in May. Regulation stability is key to a successful party/charter business. It may not even be feasible to take cod in September thru October. However, angler participation in those two fall months are so much much less than in May. Cod don't appear to spawn in September & October. I think we are safe in that regard.

Thank you for reading this.

Sincerely,

Tim Tower