



**Mid-Atlantic Fishery Management Council**

800 North State Street, Suite 201, Dover, DE 19901  
Phone: 302-674-2331 | FAX: 302-674-5399 | www.mafmc.org  
P. Weston Townsend, Chairman | Michael P. Luisi, Vice Chairman  
Christopher M. Moore, Ph.D., Executive Director

April 3, 2024

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

Dear Mike:

Please accept these comments on behalf of the Mid-Atlantic Fishery Management Council in response to the March 13, 2024, Federal Register notice regarding the potential issuance of an Exempted Fishing Permit by NOAA Fisheries to the Coonamessett Farm Foundation (CFF). CFF and their partner fishing vessels are seeking an exemption from the prohibition on fishing with mobile bottom-tending gear in the Great South Channel Habitat Management Area (HMA).

The New England Fishery Management Council designated the Great South Channel HMA through Omnibus Habitat Amendment 2 and identified discrete exemption areas for clam dredges in a subsequent framework adjustment. The framework also identified two areas of the Great South Channel HMA for research, including Davis Bank East, where this project would be located. Following the identification of the two research areas, the New England Council recommended a suite of research objectives for the Great South Channel HMA.

The notice indicates that CFF plans to conduct a multibeam survey of the full area at the beginning and end of this one-year project period, in addition to seasonal (quarterly) multibeam and drop camera surveys in the northern half of the area. The EFP indicates that compensation fishing would occur in the southern half of the area. Seasonal surveys in the northern half of the research site are intended to document seafloor characteristics absent fishing, and the surveys at the start and end of the study are intended to show seafloor characteristics before and after fishing. This work would support the research objectives for this HMA and enhance our understanding of fishing impacts in these areas. Therefore, the Mid-Atlantic Council supports the issuance of this EFP for the one-year project period.

Please call me or Jessica Coakley of my staff if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "C. Moore".

Christopher M. Moore, Ph.D.  
Executive Director

cc: W. Townsend, M. Luisi, D. Potts