



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

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September 18, 2009

Ms. Karyl Brewster-Geisz
Highly Migratory Species Management Division
1315 East-West Highway
Silver Spring, MD 20910

Dear Ms. Brewster-Geisz:

Thank you for the opportunity to comment on the Draft Amendment 3 to the 2006 Consolidated Atlantic Highly Migratory Species (HMS) Fishery Management Plan (FMP). The Council comments provided in this letter are specific to the shark gillnet fishery occurring in the Council's area of jurisdiction.

In the past the Council has repeatedly requested that gillnets be prohibited in the shark fishery. The Council's objections to the use of this gear are related to the associated bycatch, impacts on protected species and unnecessary mortality of important recreational species such as red drum and tarpon. We are gratified to see that the issues raised by the Council in previous comments regarding use of this gear to harvest sharks have been addressed in Amendment 3.

The Council took action at its September 17, 2009 session to strongly support the HMS preferred alternative B3 under Commercial gear restrictions "Close the gillnet fishery to commercial shark fishing from South Carolina south, including the Gulf of Mexico and the Caribbean Sea".

If you have any questions or require any further information, please contact me or our Executive Director, Bob Mahood.

Sincerely,

Duane Harris
Chairman

cc: MAFMC, NEFMC, GMFMC, CFMC
Council Members and Staff
Bonnie Ponwith, SEFSC

Monica Smit-Brunello, NOAA GC