



## SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

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Jessica McCawley, Chair | Mel Bell, Vice Chair  
Gregg T. Waugh, Executive Director

DRAFT

March X, 2019  
LN#: 201901

Randy Blankinship, Acting Atlantic HMS Division Chief  
NOAA Fisheries Southeast Regional Office  
263 13th Avenue South  
St. Petersburg, FL 33701

### RE: Concern over the impact of large coastal sharks on fisheries managed by the South Atlantic Fishery Management Council

Dear Mr. Blankinship:

At the December 2018 and March 2019 meetings, the South Atlantic Fishery Management Council (Council) discussed ongoing public comments expressed by recreational and commercial fishermen from throughout the South Atlantic Region regarding increasing interactions with several species from the Aggregated Large Coastal Sharks (LCS) management group. The LCS species that have been of particular focus are bull, blacktip, and sandbar sharks that are negatively interacting with fishermen using hook and line, spear, bottom longline, and trawl gear.

As many LCS species have recovered<sup>i</sup>, fishermen are increasingly relying to the Council concerns over expanded mortality of Council-managed species, such as king mackerel and many snapper grouper species, that is occurring due to LCS species consuming hooked fish before they can be boated or upon being released. In addition to the negative economic implications and frustration from losing marketable or desired target species as well as damage to fishing tackle and gear, there is apprehension over additional mortality being caused by LCS species that is not well captured through existing data streams such as commercial or for-hire logbooks, dealer reported landings, or the Marine Recreational Information Program. While there are some circumstances where discards that occur due to shark-related damage can be reported, many fish are eaten before being boated, and thus cannot be recorded as a discard.

While we recognize and appreciate that NOAA Highly Migratory Species (HMS) must abide by the provisions within the Magnuson-Stevens Fishery Conservation and Management Act in regards to the conservation of federally managed LCS and other shark species, the Council shares the above-stated concerns and would like to pursue solutions. Based on anecdotal information that the Council has received from fishermen, predation on other federally managed species from sharks can noticeably decrease after sharks are commercially targeted in an area. While many LCS species are seeing improvements in abundance through successful management by HMS, the LSC commercial quota is not being met in the Atlantic Region<sup>ii</sup>.

**Commented [JM1]:** This includes Blacktip, Bull, Lemon, Nurse, Silky, Spinner, Tiger, and Sandbar sharks.

**Commented [JM2]:** Sandbar sharks are listed as overfished. Sandbar sharks can only be retained by vessels selected to participate in the shark research fishery, are subject to retention limits established by NOAA HMS, and may only be retained when an observer is onboard.

Dusky sharks are listed as overfished and undergoing overfishing. They may not be retained. Additionally, the species has been the focus of several lawsuits. Given this background, flexibility in harvest restrictions is unlikely.

**Question for the Council:** Are these the species of sharks that the Council would like to focus on (i.e. bull, blacktip, and sandbar sharks)?

Step-ups in the retention limit throughout the year, as seen in July and November of 2018<sup>ii</sup> are welcomed, however we ask that HMS continues to work to allow fishermen to better fulfill the LCS quota so as to potentially minimize incidences of LCS consuming other federally managed species or damaging fishing gear. Additionally, the Council and HMS could work together to time step-ups in retention limits for LCS to coincide with regional peak fishing effort of Council-managed fisheries that are being negatively affected by LCS interactions, such as those for coastal migratory pelagic and snapper grouper species, to help address mortality caused by LCS consuming these species while hooked or after being released.

The Council appreciates the opportunity to provide our comments and express our concern over the growing number of negative interactions with LCS species in Council-managed fisheries. We look forward to continuing to work with HMS in the future to help implement actions with mutually beneficial outcomes for our managed fisheries. If further information or follow-up to this letter is desired, please do not hesitate to contact Gregg Waugh, Executive Director of the South Atlantic Fishery Management Council.

Sincerely,

Jessica McCawley  
Council Chair

cc: SAFMC Members & Staff  
Sam Rauch, NMFS Office of the Assistant Administrator  
Alan Risenhoover, NMFS Office of Sustainable Fisheries  
Monica Smit-Brunello, NOAA GC  
John McGovern and Rick DeVictor, NMFS SERO  
Clay Porch, Theo Brainerd, & Peter Thompson, SEFSC Miami  
Erik Williams, SEFSC Beaufort

**Commented [JMH3]: Question for the Council:** Aside from more thoroughly landing the commercial LCS quota and potentially timing step-ups in LCS retention limits with the seasonality of some SAFMC-managed fisheries, are there other solutions that the Council would like to pursue or propose to HMS?

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<sup>i</sup> Peterson, C.D., C.N. Belcher, D.M. Bethea, W.B. Driggers III, B.S. Frazier, R.J. Latour. 2017. *Preliminary recovery of coastal sharks in the south-east United States*. Fish and Fisheries. 18(5): 845-859.

<sup>ii</sup> NOAA HMS. 2018 *Atlantic Shark Commercial Fishery Landings Retention Limit Update*. Available at: <https://www.fisheries.noaa.gov/atlantic-highly-migratory-species/2018-atlantic-shark-commercial-fishery-landings-and-retention>