

December 31, 2011

Peter Cooper  
Highly Migratory Species Management Division  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, MD 20910



Dear Mr. Cooper:

Shark Advocates International (SAI) appreciates this opportunity to offer some brief comments as part of the National Marine Fisheries Service (NMFS) scoping period regarding the next phase of federal management for Atlantic sharks. I regret that I was unable to participate in the last Highly Migratory Species (HMS) Advisory Panel meeting or the scoping conference call, due to scheduling conflicts.

SAI welcomes NMFS' plans to amend the Consolidated HMS Fishery Management Plan (FMP) to address the need for additional conservation measures revealed in recent population assessments for dusky, scalloped hammerhead, and blacknose sharks. We continue to generally support the use of a variety of commercial and recreational fishery management measures, such as quotas, bag limits, size restrictions, gear modifications, time/area closures, and effort controls, as well as prohibitions on certain especially vulnerable species, to keep fishing mortality under levels advised by scientists for healthy populations.

We take this opportunity to repeat our request that NMFS add scalloped hammerheads (in light of the recently accepted assessment), along with great and smooth hammerheads (based on similarity of appearance and evidence of similar steep declines), to the prohibited species list as a first step to ensuring recovery. In recognition that these species are especially sensitive to fishing gear (are usually dead upon retrieval), we again urge NMFS to also prioritize research into means for reducing bycatch and discard mortality for these species.

We are deeply concerned that the prohibition on retention of dusky sharks has been shown to be insufficient to prevent overfishing and recover this exceptionally vulnerable species. We are eager to work with NMFS, its scientists, and other stakeholders to develop solutions to this pressing problem.

We take this opportunity to reiterate our growing concerns over the fishery and management status of Atlantic smooth dogfish (smoothhound sharks). As you know, this population has yet to be assessed and basic federal management measures developed years ago have recently been stalled. At the same time, landings from targeted smoothhound fisheries are on the rise. We recognize the significant role of Atlantic state fishery managers in addressing this situation, but also urge NMFS to make conducting or facilitating a smoothhound stock assessment a top priority, and to implement planned restrictions on smoothhound catches without further delay.

Thank you for considering our views. We look forward to the discussions around the next phases in amending the HMS FMP.

Sincerely,

A handwritten signature in black ink, appearing to read "Sonja Fordham".

Sonja Fordham  
President