

The Florida Coastal and Ocean Coalition

Caribbean Conservation Corporation & Sea Turtle Survival League •
Reef Relief • Gulf Restoration Network • Natural Resources Defense Council •
The Surfrider Foundation • Ocean Conservancy • Environmental Defense Fund

March 28, 2008

Chris Vonderweidt
Fisheries Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1444 Eye Street, NW, Sixth Floor
Washington, DC 20005

Re: Atlantic Coastal Sharks Management Plan

Mr. Vonderweidt,

On behalf of the Florida Coastal and Ocean Coalition, please accept these comments regarding the Atlantic States Marine Fisheries Commission Interstate Fishery Management Plan (FMP) for Atlantic Coastal Sharks. The Coalition is a first-time effort of environmental organizations to join forces to conserve, protect and restore Florida's coastal and marine environment. Our steering committee organizations represent millions of citizens across the country and over 200,000 members, businesses and activists in Florida deeply concerned for Florida's unique seaside and marine resources.

We are deeply concerned about the status of many Atlantic shark populations due to increasing fishing pressure, the lack of compatible regulations between the various states and federal initiatives, the slow growth and reproductive potential for most coastal shark species, and the continued practice of "finning," or the removal of a shark's fins without landing the entire fish. We would like to take this opportunity to thank the Commission for developing this conservation plan for sharks, and offer the following comments.

The Coalition strongly supports the following objectives for the Atlantic Coastal Shark FMP:

- End overfishing of Atlantic Sharks, and implement measures to prevent overfishing in the future;
- Rebuild overfished populations and control all components of fishing mortality, both directed and incidental, to insure long-term sustainability;
- Implement measures to reduce and minimize by-catch;
- Assemble necessary data to assess stocks and implement sustainable fishery management for coastal shark species;
- Promote protection of coastal shark habitat; and,
- Ensure that state shark fishing regulations are at least as stringent as regulations for federal waters.

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In addition, the Coalition supports the following conservation measures for coastal shark species:

- A May 15-July 15 ban on fishing all large coastal shark species to protect pregnant females within inshore birthing areas;
- A 4.5 foot size limit for large coastal pelagic shark species to increase the likelihood that they will have a chance to reproduce;
- A prohibition on fishing for threatened hammerheads, sandbar, thresher and oceanic whitetip sharks;
- A requirement that fishermen leave fins attached to shark bodies to prevent finning and improve species identification, and;
- Limits on fisheries for smooth dogfish, currently the only targeted but unregulated Atlantic shark species.

In conclusion, the Coalition would like to emphasize our support for conservation measures in the FMP which ensure that state fishing regulations are at least as stringent as those in federal waters. Most Atlantic coastal shark species migrate across multiple state boundaries, and consistency in state and federal regulations throughout their ranges is essential to effective conservation. Increasing protection in state waters is necessary to protect the most vulnerable sharks, such as pregnant females and juveniles that spend time within inshore waters, as well as reducing by-catch of threatened species.

Thank you for accepting and considering these comments.

Sincerely,

Gary Appelson – Caribbean Conservation Corp.

Sarah Chasis, J.D. – Natural Resources Defense Council

Ericka D'Avanzo – Surfrider Foundation

Jerry Karnas – Environmental Defense Fund

Paul Johnson – Reef Relief

Joe Murphy – Gulf Restoration Network

David White, J.D. – Ocean Conservancy

cc: Charlie Crist, Governor, State of Florida
Commissioners, Florida Fish & Wildlife Conservation Commission
Ken Haddad, Exec. Director, Florida Fish & Wildlife Conserv. Commission
Rob Kramer, President, International Game Fish Association
Distribution