

Steven Atran

From: Steven Atran
Sent: Thursday, August 28, 2008 3:51 PM
To: 'SCS_Scoping@noaa.gov'
Cc: All Technical Staff
Subject: Scoping comments on HMS Amendment 3 (small coastal sharks)

Thank you for the HMS Amendment 3 scoping meeting at St. Petersburg on August 27, 2008, presented by Jackie Wilson and Rick Pearson. This scoping meeting was to discuss issues related to the overfished and overfishing status determination on blacknose sharks, and to the management of small coastal sharks in general. During and after the presentation, I made several comments, and I was asked to follow up and provide those comments in writing. From my notes, and with a little bit of expansion in some cases, here are my comments. Please note that these are my personal comments. The Gulf of Mexico Fishery Management Council will provide its comments following the presentation that is scheduled to be given at the Council meeting in Mobile, Alabama October 27-30, 2008.

COMMENTS RELATED TO THE SEDAR 13 BLACKNOSE SHARK STOCK ASSESSMENT

- The GOM shrimp trawl bycatch portion of blacknose shark mortality (45 percent) seems extremely high and unlikely to occur in the future for several reasons.
 - Shrimp fishing effort in 2005 in areas where red snapper are abundant was reduced by 50 to 60 percent from the baseline 2001-2003 period and was reduced by approximately 65 percent in 2006 (Reef Fish Amendment 27/Shrimp Amendment 14, page 37). Preliminary indications are that effort has been further reduced in 2007 and 2008 by approximately 75 percent.
 - The number of vessels participating in the offshore shrimp fishery is expected to continue declining until at least 2012, and has been further reduced by the impacts of Hurricanes Katrina and Rita (Reef Fish Amendment 27/Shrimp Amendment 14, page 37).
 - Reef Fish Amendment 27/Shrimp Amendment 14, implemented in 2008, provides a process for establishing time/area closures in the shrimp fishery in the 10- to 30-fathom area in the Gulf Statistical Subzones 10-21 (Alabama through Texas) if necessary to assure that red snapper bycatch mortality is reduced by 74 percent from than the benchmark years of 2001-2003 for the years 2008 through 2010. This target may be modified as red snapper rebuild, but the eventual target reduction goal is 60 percent by 2032. With these controls, shrimp trawl effort is unlikely to rebuild to its prior historical levels.
- Landings or catch rates for several fish stocks were at historical highs in 2004-2005. As a result, basing blacknose shark mortality rates by gear type using the years 1999-2005 may produce anomalous results that are not representative of long term trends. Those estimates should be recalculated using more recent years or a longer time series of years.
- According to the presentation, the average blacknose shark landed in the recreational fishery weighed only 1.5 lbs. Dressed weight, corresponding to a fish less than two feet long. The minimum size limit is 54 inches. Considering that the recreational statistic does not include dead discards and is for landed sharks only, an average landed size of less than half the legal limit does not make sense.
- The recreational catches included only landed sharks (MRFSS type A+B1, along with Texas and headboat data). However, released blacknose sharks (MRFSS type B2) make up a substantial proportion of the total recreational catches, in some years exceeding landings. In other stock assessments that I am familiar with, a release mortality percentage is applied to the B2 releases to account for recreational dead discards. Leaving recreational dead discards out may result in erroneous assessment results.
- According to the SEDAR 13 Data Workshop report, both genetic and tagging data suggest that blacknose sharks do not move between the Gulf of Mexico and the South Atlantic. This strongly supports treating the GOM and SA populations as two separate stocks. Instead, the assessment treated them as a single stock and averaged important life history parameters. For example, the reproductive periodicity on the GOM is considered to be annual, while in the SA it is considered to be every two years. The assessment averaged these parameters and used a periodicity of 1.5. As a result, the assessment likely concluded that the GOM population is in worse shape than it actually is, and the SA population is in better shape than it actually is. The assessment should be rerun treating the GOM and SA as two separate stocks with the appropriate regional parameters.

COMMENTS RELATED TO MANAGEMENT ISSUES AND OPTIONS

- During the presentation, it was noted that an IFQ system for sharks was suggested, but there were concerns that it would take too long to develop. The Gulf Council has just recently implemented an IFQ system for its red snapper fishery, and is in the process of developing a multi-species IFQ system for its grouper and tilefish fisheries. Using either or both of these as a template for a shark IFQ could shorten development time.
- It was noted that much of the mortality on blacknose sharks occurs on juveniles, which tend to be found in nearshore high salinity areas during the summer pupping time. In the GOM, it might be possible to reduce juvenile mortality by adopting for shark longlines, at least on a seasonal basis, the existing reef fish longline boundary (20 fathoms east of Cape San Blas, Florida, 50 fathoms west of Cape San Blas. If this eliminates too much of the traditional shark fishing grounds to be acceptable, than perhaps the “stressed area” boundary, which varies from 10 to 30 fathoms, could be considered.
- It was noted that a VMS for shark fishing vessels was being considered. In the GOM, VMS is required on all commercially permitted reef fish vessels, and many of those vessels are also permitted for shark fishing. If a shark VMS is implemented, attempts should be made to make the required equipment and monitoring methods compatible with the reef fish VMS in order to minimize costs to both fishermen and NMFS.

Thank you for this opportunity to comment.

Sincerely,

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