July 10, 2014

Eileen Sobeck
Assistant Administrator
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

RE: NOAA-NMFS-2013-0045

Dear Assistant Administrator Sobeck:

On behalf of the millions of members that the undersigned groups represent, we write to express alarm over the precipitous decline of dusky sharks in U.S. waters. We urge you to reverse this decline and ensure the recovery of this imperiled species by listing the northwest Atlantic population of dusky shark as threatened under the Endangered Species Act (ESA), and designating appropriate critical habitat.

The best available science indicates that the northwest Atlantic dusky shark distinct population segment, which is the population of the species that lives primarily in U.S. waters, is currently approximately 15 to 20% of its mid-1970s abundance[1]. The International Union for the Conservation of Nature (IUCN) has classified the northwest Atlantic population of dusky sharks as endangered[2]. Given the very low reproductive potential of dusky sharks and their very high at-vessel fishing mortality rate[3], recovery from this severe level of depletion requires strong protections to limit mortality and facilitate population rebuilding. Changes in management to date using fisheries authorities, including a prohibition on retention in both commercial and recreational fisheries since 2000, have failed to end overfishing and arrest the species' decline. Climate change

[1] Southeast Data, Assessment, and Review (SEDAR). 2011. SEDAR 21 Stock Assessment Report: HMS Dusky Shark. North Charleston, South Carolina. http://www.sefsc.noaa.gov/sedar/download/Dusky_SAR.pdf?id=DOCUMENT
[2] Musick, J.A., Grubbs, R.D., Baum, J., and E. Cortés. 2009. *Carcharhinus obscurus*. In: IUCN 2011. IUCN Red List of Threatened Species. Version 2011.2. <www.iucnredlist.org>.
[3] Morgan, A., and G.H. Burgess 2007. At-vessel fishing mortality for six species of sharks caught in the northwest Atlantic and Gulf of Mexico. Gulf and Caribbean Research 19 (2): 123-129; Romine, J.G., John A. Musick, J.A., and G.H. Burgess. 2009. Demographic analyses of the dusky shark, *Carcharhinus obscurus*, in the Northwest Atlantic incorporating hooking mortality estimates and revised reproductive parameters. Environmental Biology of Fishes 84: 277-289.

poses additional threats to the recovery of the dusky shark population in the northwest Atlantic, including through warming sea bottom temperatures that are likely to increase dusky shark bycatch mortality. Food web disruptions, impacts to nursery habitats, and potential shifts in the dusky shark's existing range threaten to exacerbate the shark's vulnerability to existing threats.

As a top predator, dusky sharks play an important role in maintaining the long-term health of coastal marine ecosystems. An ESA listing would help this depleted species to recover and be more resilient against ongoing threats. The recovery of this species would also have economic benefits through the ecotourism and diving industries.

In light of the dusky shark's highly depleted population level, the ongoing threats from unsustainable fishing, habitat damage, and the insufficiency of current management and conservation measures, we urge NMFS to take action to recover this magnificent animal by providing it with the protection afforded through the Endangered Species Act.

Sincerely,

Bradford H. Sewell
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David McGuire, MEH
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Shark Stewards

Dr. Ryan Kempster
Shark Biologist and Founder
Support Our Sharks

Veerle Roelandt
Shark Conservationist
The Global Shark Conservation Initiative

Sharon B. Young
Marine Issues Field Director
The Humane Society of the United States

John Baker
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Michele Kuruc
Senior Vice President - Marine
World Wildlife Fund – U.S.

cc: Maggie Miller, Office of Protected Resources