

May 25, 2022

Andrew Strelcheck  
Regional Administrator  
Southeast Regional Office  
National Marine Fisheries Service (NMFS)  
263 13th Avenue South  
St. Petersburg, Florida 33701

Dear Mr. Strelcheck:

As members of the Smalltooth Sawfish Recovery Implementation Team (SSRIT), we write with growing concern over threats to the success of our rebuilding efforts for this endangered species from dramatically increased bycatch allowances in the face of woefully inadequate fishery observer coverage for the exceptionally lethal Gulf of Mexico shrimp fishery.

The recent paper “Commercial fishery bycatch risk for large juvenile and adult smalltooth sawfish (*Pristis pectinata*) in Florida waters” published earlier this year in *Aquatic Conservation: Marine and Freshwater Ecosystems* [1] highlights these threats and -- for the first time -- makes a specific, expert recommendation to mitigate bycatch mortality with a year-round closure of shrimp trawling off much of Southwest Florida. This paper also finds that female sawfish are at higher risk from shrimp trawl bycatch than males, due to their greater overlap with areas of shrimp trawling effort.

As you are likely aware, sawfish caught in shrimp trawls are typically dragged for hours, resulting in substantially higher mortality than that associated with stationary nets and hooks. Despite this serious and well-known threat, observer coverage for Gulf of Mexico shrimp trawlers is extremely low (1-2%) and NMFS’ bycatch reporting requirements are insufficient to prompt sawfish encounter data from vessels without observers. The SSRIT has long been concerned over the resulting uncertainty that greatly hinders bycatch estimation and mitigation. This concern is heightened now that an analysis in the recent NMFS biological opinion for this fishery has extrapolated the highest annual sawfish capture estimates from already questionable observer data to calculate new levels of authorized capture (1806 over five years) at *five times* the previous limit. This is especially alarming in light of Graham *et al.*’s finding of females’ elevated bycatch risk and previous genetic analyses [2,3] estimating that the entire U.S. population of smalltooth sawfish may be dependent on as few as 126 females, which -- under the new limit -- could be legally removed in just one year.

For these reasons, we request immediate consideration of the following science-based remedies:

- A year-round closure for shrimp trawling off Southwest Florida, along the lines of the Graham *et al.* proposal, notwithstanding the Aquatic Preserve, National Park, and Sanctuary areas already closed to commercial shrimping;
- A substantial increase in observer coverage/video monitoring systems for shrimp trawl vessels fishing in waters off Florida;
- Immediate reinitiation of consultation on the NMFS Gulf of Mexico shrimp fishery biological opinion with respect to authorized take of smalltooth sawfish; and
- A requirement for detailed reporting of all commercial fishery encounters with sawfish.

We also request that the SSRIT be given advance notice of any presentations about these sawfish issues that NMFS may plan for relevant fishery management entities, and that our members be invited to participate in any meetings that NMFS may pursue with the shrimp fishing industry.

Thank you for your attention to these pressing matters. We look forward to your reply.

Sincerely,



Sonja Fordham  
President

Shark Advocates International  
The Ocean Foundation

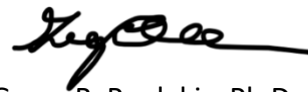


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<sup>1</sup> Graham, J., Kroetz, A.M., Poulakis, G.R., Scharer, R.M., Carlson, J.K., Lowerre-Barbieri, S.K. et al. (2022). Commercial fishery bycatch risk for large juvenile and adult smalltooth sawfish (*Pristis pectinata*) in Florida waters. *Aquatic Conservation: Marine and Freshwater Ecosystems*, 32 (3), 401–416. <https://doi.org/10.1002/aqc.3777>.

<sup>2</sup> Feldheim, K.A., A.T. Fields, D.D. Chapman, R.M. Scharer, and G.R. Poulakis. 2017. Insights into the reproduction and behavior of the smalltooth sawfish *Pristis pectinata*. *Endangered Species Research* 34:463-471.

<sup>3</sup> Smith, K.L., K. Feldheim, J.K. Carlson, T.R. Wiley, S.S. Taylor. 2021. Female philopatry in smalltooth sawfish *Pristis pectinata*: Conservation and Management Implications. *Endangered Species Research*. DOI: <https://doi.org/10.3354/esr01122>.