



LOUISIANA WILDLIFE FEDERATION

The voice of Louisiana's wildlife and natural resources since 1940.

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October 18, 2024

Jason Adriance
Finfish Program Manager
Department of Wildlife and Fisheries
2000 Quail Drive
Baton Rouge, La. 70808

Emailed jadriance@wlf.la.gov

Re: Notice of Intent to Expand Recreational and Commercial Shark Harvest

Dear Mr. Adriance,

Thank you for the opportunity to comment on the Notice of Intent (NOI) to expand recreational and commercial shark harvest passed by the Louisiana Wildlife and Fisheries Commission at their September 2024 meeting.

The NOI outlines a proposal to remove the recreational daily size, bag, and possession limits of Blacktip and Bull Sharks currently set at 54 inches fork length and possession limit of one per person or one per vessel. The proposed rules would result in no minimum size or bag limit for either species.

Additional modifications to the rule prohibit the retention of Shortfin Mako Sharks in both the recreational and commercial fisheries and provide for an increase in the daily commercial trip limit from 45 to 55 sharks from the Large Coastal Species group, making permanent a temporary bag increase passed in December 2022.

A number of reasons have been given for these expansions including improved stock assessments, evidence of Blacktip and Bull Shark population growth, an increase in human interaction, and depredation of fishing efforts. Louisiana's LA Creel shows light recreational and commercial landings of both shark species, however the Relative Standard Error for most recent years is higher than 50 with a caution that "Users should view estimates with increasing caution as RSEs increase beyond 30. Large RSEs (those above 50) indicate high variability around the estimate and therefore low precision."

At the federal level, several stock assessments (2012, 2018, 2018 update, and 2020) all indicate that Blacktip Sharks were not overfished and is resilient to overfishing in the Gulf of Mexico, according to the Southeast Data, Assessment and Review (SEDAR) process. However, there is no current SEDAR stock assessment available for the Bull Shark in the Gulf of Mexico. Although there is one in the works, the results of that assessment have not been released as of the writing of these comments.

While the Louisiana Wildlife Federation has no objection to shark fishing in general, and no objection to the current NOI, we have a number of questions regarding the justification for doing

away with bag and size limits for these two species, especially with stock assessment for the Bull Shark still in progress.

There remains uncertainty for the cause of increased human interaction and depredation. For example, it is possible that increased interactions between people and Blacktip and Bull Sharks could be related to a number of factors aside from population growth including warming waters making inshore areas attractive to Bull Sharks for longer time periods than in the past (<https://www.nature.com/articles/s41598-024-54573-0>).

In another study in 2023, researchers found that increases in depredation, “may be the result of several factors, including changes in fishing practices, learned behavior of sharks, reductions in natural prey, and environmental shifts; however, many anglers believe depredation is increasing because of increasing shark populations.” (<https://www.frontiersin.org/journals/conservation-science/articles/10.3389/fcosc.2023.1271223/full#B26>)

To ensure that these factors are accounted for, the Louisiana Wildlife Federation would encourage the development of a more complete and more statistically valid monitoring of the Blacktip Shark and Bull Shark to better understand potential impacts to populations, but also provide information to help fishermen better avoid depredation issues.

In a 2024 study, it was found that as temperatures continue to rise, “bull sharks in the north-western Gulf of Mexico could forgo their winter migrations in the next 50–100 years based on current trends and physiological limits, thereby altering their ecological roles in estuarine ecosystems and recruitment into the adult population.” (<https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2656.14140>)

This change in migratory, or non-migratory, patterns of Bull Sharks into the future could mean these human/shark interactions will continue to increase, regardless of population numbers. Collecting meaningful monitoring now could help for future management.

In addition, the Louisiana Wildlife Federation would encourage an education campaign on shark identification. There is a list of prohibited shark species in the rules where no harvesting is allowed and there can be confusion between sharks now proposed for no limits and those that still have limits.

Education and identification pamphlets placed at marinas along the coast could help with recreational compliance with species limitations while allowing for harvest of allowed species.

Sincerely,
Rebecca Triche



Executive Director
Louisiana Wildlife Federation