



June 27, 2013

Kim Marshall
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
1315 East-West Highway
Silver Spring, MD 20910

Re: Proposed Rule regarding Implementation of the Shark Conservation Act of 2010: NOAA–NMFS–2012–0092

Dear Ms. Marshall,

We are a group of shark attack survivors from multiple states around the country who work globally to protect sharks. Despite grave injuries, including losing arms and legs, we are deeply passionate about saving these animals because they are crucial for healthy ocean ecosystems upon which everyone depends. In 2009 and 2010, in cooperation with The Pew Charitable Trusts, many of us worked with members of Congress to encourage passage of the Shark Conservation Act.

We are extremely concerned with the proposed rule to implement the Shark Conservation Act of 2010. We supported passage of the Act because it strengthened the ban on shark finning in U.S. waters and encouraged shark conservation around the world. We were proud to say that our country was a global leader in helping to conserve the ocean's top predator. However, now we are disappointed that the proposed rule to implement the Act, if approved as written, could overturn state laws that are more restrictive than the federal law. We urge you not to preempt and undermine shark fin bans of the U.S. states and territories.

When many of us volunteered our time to travel to Washington, D.C. to meet with various members of Congress and advocate for the passage of the Shark Conservation Act, we knew that up to 73 million sharks were killed annually to support the shark fin trade alone. Today, research has shown that approximately 100 million sharks are killed annually. As you know, sharks grow slowly, mature late, and produce few young. This level of fishing is unsustainable.

Bans on shark fin trade in California, Delaware, Hawaii, Illinois, Maryland, Oregon, Washington state, American Samoa, Guam, and the Northern Mariana Islands were enacted after considerable public input, in an effort to enhance existing U.S. shark protections. In most jurisdictions, these laws ban the possession, sale, and trade of shark fins, thus preventing fins from finned sharks or those caught unsustainably from being sold.

Any rules to implement the federal law that result in overturning more restrictive state or territorial laws could put already stressed shark populations at additional risk. As shark attack survivors, we are uniquely qualified and feel a personal responsibility to speak up for these

animals. We want our tragedies to result in a greater good. And we ask that our government stand behind us and do what's right for shark conservation. Please do not weaken the intent of the Shark Conservation Act of 2010 by preempting and undermining shark fin bans of states and territories.

Sincerely,

Shark Attack Survivors for Shark Conservation

[Chuck Anderson](#), Summerdale, Alabama. Chuck lost his arm in 2000 during a struggle with a bull shark while training for a triathlon in the Gulf of Mexico.

[Mike Beach](#), Miami Beach, Florida. Mike suffered a serious leg injury when bitten in the Bahamas in 1996.

[Kent Bonde](#), Miami, Florida. Kent lost most of his calf muscle to a bull shark off Grand Bahama Island in 2001.

[Laurie Boyette](#), Wakefield, Rhode Island. Laurie lost her right buttock and suffered severed tendons in eight fingers as she fended off a 12- to 14-foot tiger shark while swimming offshore on Kona, Hawaii in 1999.

[Mike Coots](#), Kauai, Hawaii. Mike lost his leg to a tiger shark in 1997 while surfing.

[Scott Curatolo-Wagemann](#), Ridge, New York. A lemon shark seriously injured Scott's leg in 1994 while he was studying marine biology in the Bahamas.

[Michelle "Micki" Glenn](#), Niceville, Florida. Micki lost much of her right upper arm and armpit to a gray reef shark on a dive trip to the Turks and Caicos in 2002.

[Jonathan Kathrein](#), Mill Valley, California. Jonathan's major leg muscles were severed by a great white shark when he was body boarding off the Northern California coast in 1996.

Robin Knutson, Brookdale, California. Robin lost her right hamstring and suffered paralysis of her right leg when she was attacked by a great white shark while swimming in Maui, Hawaii in 1999.

Chris Myers, Denver, Colorado. Chris suffered leg injuries from a great white shark in 2012 while body surfing off Cape Cod.

[Debbie Salamone](#), Orlando, Florida. Debbie's Achilles tendon was severed in 2004 while swimming off Florida's east coast.

[Krishna Thompson](#), Lake Grove, New York. Krishna lost his leg in 2001 during a struggle with a bull shark during a swim in the Bahamas on his 10th wedding anniversary.