

**From:** [Haley Stewart](#)  
**To:** [FGC](#)  
**Subject:** Proposed Listing of White Sharks under California Endangered Species Act  
**Date:** Wednesday, May 21, 2014 11:38:16 AM  
**Attachments:** [White Shark Listing FGC 5.21.pdf](#)

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Dear President Sutton and Commissioners,

Please see the attached comments from Defenders of Wildlife regarding the proposed listing of white sharks as threatened or endangered under the California Endangered Species Act. These comments are being submitted for the June 4<sup>th</sup> Fish and Game Commission meeting. If you have any questions, please feel free to contact me at (916)313-5800 ext. 108, or [hstewart@defenders.org](mailto:hstewart@defenders.org).

Thank you,  
Haley



**Haley Stewart**  
California Program Associate

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Defenders of Wildlife  
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May 21, 2014

President Mike Sutton  
Members of the California Fish and Game Commission  
1416 Ninth Street, Suite 1320  
Sacramento, CA 95814  
[fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)

Dear President Sutton and Commissioners,

On behalf of Defenders of Wildlife (Defenders), and our more than 180,000 California members and supporters, I write in regards to proposed listing of Northeastern Pacific white sharks as Threatened or Endangered under the California Endangered Species Act (CESA). Defenders supports the proposed listing in addition to further protections to minimize the bycatch mortality of white sharks along the coast.

The area along the California coast and Baja California, Mexico is home to a unique population of white sharks that are genetically distinct and isolated from all other great white sharks around the globe. With only an estimated few hundred adult and sub-adult individual white sharks remaining in this population, the survival of white sharks along our west coast is at risk.

White sharks are a critical component of our ocean ecosystems. As top ocean predators, white sharks play a critical role in structuring the marine ecosystem by keeping prey populations like seals and sea lions in check. The presence of white sharks in California and Mexico ultimately increases species diversity of the overall ecosystem.

While there are some existing protections in place, juvenile white sharks continue to be unintentionally caught as bycatch by U.S. and Mexican commercial fishing gillnets in important nursery areas for these young sharks. Under existing regulations, there are no limits on this bycatch, nor is there sufficient observer coverage in these fisheries. In addition, juvenile white sharks along Southern California have some of the highest levels of mercury, DDT, and PCBs found in any shark species worldwide.

Endangered Species listing will be critical to effectively addressing the continued bycatch of white sharks, while promoting additional scientific research on this population of grave concern. Defenders urges you to protect white sharks by listing the Northeastern Pacific population on the Endangered Species List.

Furthermore, we ask that you prioritize the implementation of new regulatory protections to minimize the bycatch mortality of white sharks in the Commission-managed set gillnet fishery that takes place in federal waters off Southern California, including consideration of time-area closures,

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increased observer coverage requirements, hard caps on bycatch, and limits on soak time of set gillnets. Action by California is an important component of a comprehensive effort that includes pressure on Mexico to address white shark bycatch in its fisheries.

Sincerely,

A handwritten signature in cursive script that reads "Haley Stewart". The signature is written in a dark ink and is positioned to the left of the typed name.

Haley Stewart  
Defenders of Wildlife  
Hstewart@defenders.org