



**THE BILLFISH FOUNDATION**  
CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY

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February 25, 2019

South Atlantic Fishery Management Council  
Dolphin and Wahoo - Amendment 10

Transmitted Via Email

Dear Council/Committee Members:

The Billfish Foundation (TBF) is the leading sportfishing conservation organization for billfish and associated species including dolphin fish (mahi mahi), which are very important as prey fish to billfish and as targeted species for offshore anglers, who fish for tuna and billfish, mahi mahi and wahoo. The overfished and overfishing status of Atlantic blue marlin is the result primarily of pelagic longline gear. In addition to billfish, the gear's bycatch includes marine mammals, sea turtles, sharks, mahi mahi and other species. The impact pelagic longline gear has made to the status of many species is documented and justifies further restriction to the gear to prevent a serious decline in mahi mahi and fishing opportunities. While mahi mahi do reproduce and grow quickly, but local stocks can be fished down.

Mahi Mahi are very important for the U.S. recreational fishery with over a half million trips estimated to have been taken in a year just off Florida. The economic impact made from this fishery is substantial to thousands of businesses, jobs and to the state's economy from expenditures and taxes.

To achieve some equity in fishing opportunities, viability of fisheries, related businesses and the population of a targeted species, in this case mahi mahi, balancing the fishing pressure and gear efficiency is important. It takes only a few pelagic longline vessels to fish down a species, whereas far less of an impact is made by individual anglers fishing from either private or charter vessels. Pelagic longline vessels also have a greater range, in most cases, than private boat or charter boats with anglers, giving them the capacity to catch many other species beyond the range of recreational fisheries.

At this point electing a gear-based allocation option for mahi mahi is important, otherwise within a short number of years you may be dealing with an overfished stock and restricting fishing opportunities, and thus, businesses will be before you. It's time to allocate fishing for mahi mahi to recreational gear and non-longline commercial gear.

Thank you for the opportunity to share our perspective and recommendation.

Respectfully,

A handwritten signature in black ink that reads "Ellen Peel". The signature is written in a cursive, flowing style.

Ellen Peel  
President