Beyond Our Shores Foundation
Dolphinfish Research Program

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South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
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Dear Mr. John Carmichael and Council Members:

With the recent finalization of 2022 Marine Recreational Information Program (MRIP) survey data, the 25-year plus downward trend for recreational dolphin landings along the U.S. East Coast was extended. Furthermore, average recreational landings for the past five years (2018-2022) of 11.4 million pounds were 48% (10.6 million pounds) less than average landings for the 1993-1997 period (22.0 million pounds). For the United States Atlantic directed dolphinfish commercial fleet, NOAA Fisheries data over a similar period shows an even steeper decline. Average landings for 2017-2021 of 0.48 million pounds are 67% lower than average landings of 1.5 million pounds for 1993-1997. The most recent landings for the recreational sector was 9.8 million pounds in 2022 and 240 thousand pounds for the commercial sector, in 2021.

The Dolphin Wahoo Fishery Management Plan (FMP) calls for maintaining historical catch levels and taking a precautionary approach to management. With the magnitude of the landings decline coupled with recent delays in moving forward with Regulatory Amendment 3, it appears neither of those aspects of the FMP are being pursued. Due to movement connectivity of dolphin throughout national jurisdictions in the Western Central Atlantic Ocean (WCA), U.S. Atlantic management and conservation measures for dolphin are not the only action needed to reverse or at least level out the trend, however, they are important ones due to the size of the U.S. fishery and from an international leadership perspective. The lack of timely action runs the risk of more stringent management measures being required and thus a recovery being more difficult than if prompt and meaningful conservation is implemented through Regulatory Amendment 3.

The Management Strategy Evaluation (MSE) is a worthwhile project and offers the potential for more effective management in the future. However, if management measures such as modifications to the current size and bag limits are delayed until results of the MSE begin to be available there is the risk that a further decline will result given the trend described above. The MSE is now tentatively projected to be completed at the end of 2024. The amendment process typically takes 1-3 years. Thus, it could be 2026 or 2027 at best until management measures are

in place and several more years until there is a meaningful impact. If the current rate of decline continues through 2027, the five-year average landings will be down between 50% to 60% from the 1993-1997 period. While the MSE very well may be the management tool of the future, until it is developed and in place, traditional management approaches (i.e., reduce catch, effort, and implement size protections) are needed in order to be precautionary, and manage toward returning the stock to historical levels and minimize the probability the stock will not be at a critical level by that time.

An ongoing analysis of recreational fishing effort and catch data in the Florida Straits shows continued slow offshore fishing for spring 2023. Three recreational vessels monitored for catch and effort for all of their spring outings (May 1, 2023, to June 6th, 2023) (Figure 1) only caught 17 keeper dolphinfish (range: 21" to 36" fork-length) between 13 offshore outings (Table 1). Of those 17 keepers, only one was greater than 24" and it was a 36" dolphinfish caught off Bimini, Bahamas, in early June. Collectively, the vessels caught 1.3 keeper dolphinfish per trip over the 6-week monitoring period. The vessels also struggled to voluntarily tag and release small fish. Collectively, 51 fish were tagged with 90% less than Florida's minimum size. Only 5 fish were tagged and released that could have been legally kept. Those fish ranged in size from 20"-22" fork-length. Each vessel monitored represents a recreational captain with greater than 30 years of fishing experience in the Florida Straits.

Outside of the Florida Straits, four charter vessels monitored during May off San Juan, Puerto Rico, among 54 offshore outings (Figure 2), reported 86 dolphinfish landed. Trip catch statistics for these outings are presented in Table 2. Collectively, the vessels caught 1.5 keeper dolphinfish per trip over the 4-week monitoring period (Table 2). Of those 86 dolphinfish kept, 71 were caught at fish aggregating devices (FADs) deployed off the region. If those FADs were not in place, only 15 dolphinfish would have been landed, or .27 fish/trip between vessels. Off Puerto Rico, the landed fish ranged in size from 25" to 48" fork-length, with 36 fish landed in the 11-20 pound size class, and 10 fish larger than 20 pounds.

While comparisons of private recreational vessel outings in the Florida Stratis to charter outings off San Juan, Puerto Rico, may be deemed statistically unacceptable by some, both regions and sectors share two unignorable attributes: (1) dolphinfish was the most landed species by outing over the period, and (2) dolphinfish have been shown to move from the U.S. Caribbean Sea to the Florida Straits in a general westward movement trend during spring (Figure 3). Therefore, by comparison with the north coast of Puerto Rico, drastically less fishing success would have been observed had the FADs not been present and fishable off San Juan, Puerto Rico. With the FADs, fishing success rate was greater than that observed by the vessels monitored in the Florida Straits with 28% less trip duration, 53% less trip distance, and 55% less offshore range to encounter more fish that were mostly larger than the largest fish encountered in the Keys (only 1 36" fish fell in the PR observed size range). May represents a month when the traditional dolphinfish season has ended off San Juan, PR, while in the Florida Straits, May should be the heart of the spring run. This begs the question given the vessel tracking and tagging data presented in this document, how does trip encounter rate for keepers and size frequency of dolphinfish landed change from east to west during spring along the Greater Antilles? Data

presented here would suggest a negative trend in terms of keeper encounter rate and size of fish landed from the U.S. Caribbean Sea west toward the Florida Straits.

The WCA dolphin fishery has experienced declines. The proportional effect of the decline, whether directly from increasing fishing effort, from climate change, or a combination of these and other factors, are leading to negative economic impact on businesses reliant on the WCA dolphin fishery. While expanded dolphin regulations could have a short-term unfavorable economic impact, those regulations over the longer term are meant to rebuild and sustain revenue and business viability. As it currently stands, many anglers in the Florida Keys, the largest recreational dolphinfish fishery along the U.S. East Coast and greater than all other segments combined, have stated that fishing for dolphin is no longer viable given the lack of keeper dolphin relative to trip effort and expenses. Action to conserve and manage the WCA dolphin stock from the SAFMC is needed now more than ever.

Recent motions in the Caribbean Fishery Management Council as well as ongoing dialogue among some Caribbean Island nations point toward increasing protection and conservation of juvenile dolphinfish. These actions were made, and discussions have occurred, to support the best interest of the fishery. A consistent minimum size would protect young of the year fish that are responsible for strong annual recruitment. Furthermore, creating bag and vessel limits, in conjunction with minimum sizes, could aid in stock recovery due to growth in abundance of year-0 fish.

Thank you for the opportunity to provide comments on this amendment.

Best Regards,

Wessley Merten, Ph.D.
Director
Beyond Our Shores Foundation
Dolphinfish Research Program

Figure 1. Recreational fishing trips (n=13) embarked on from May 1, 2023, through June, 6, 2023, by three recreational fishing vessels in the Florida Straits.

Table 1. Recreational fishing trip summary data for Spring 2023 for three vessels monitored in the Florida Straits (n=13 offshore trips) that caught 17 keeper dolphinfish (21"-24" except for one 36" fish caught off Bimini).

	Trip Duration (hr)	Trip Distance (mi)	Range Offshore (mi)	Catch Statistics		
				Keepers/trip	Keepers/hr	Keepers/mi
Total	99.60	1381.70		1.30	0.17	0.01
Average/trip	7.66	106.28	28.44			

Figure 2. May 2023 recreational (charter) fishing trips (n=54) from four vessels monitored off San Juan, Puerto Rico.

Table 2. Recreational fishing trip summary data for May 2023 for four charter vessels monitored off San Juan, Puerto Rico (n=54 offshore trips), that caught 86 keeper dolphinfish (25" to 48" fork-length).

	Trip Duration (hr)	Trip Distance (mi)	Range Offshore (mi)	Catch Statistics		
				Keepers/trip	Keepers/hr	Keepers/mi
Total	318.68	2895.37		1.59	0.38	0.04
Average/trip	5.59	50.79	12.74			

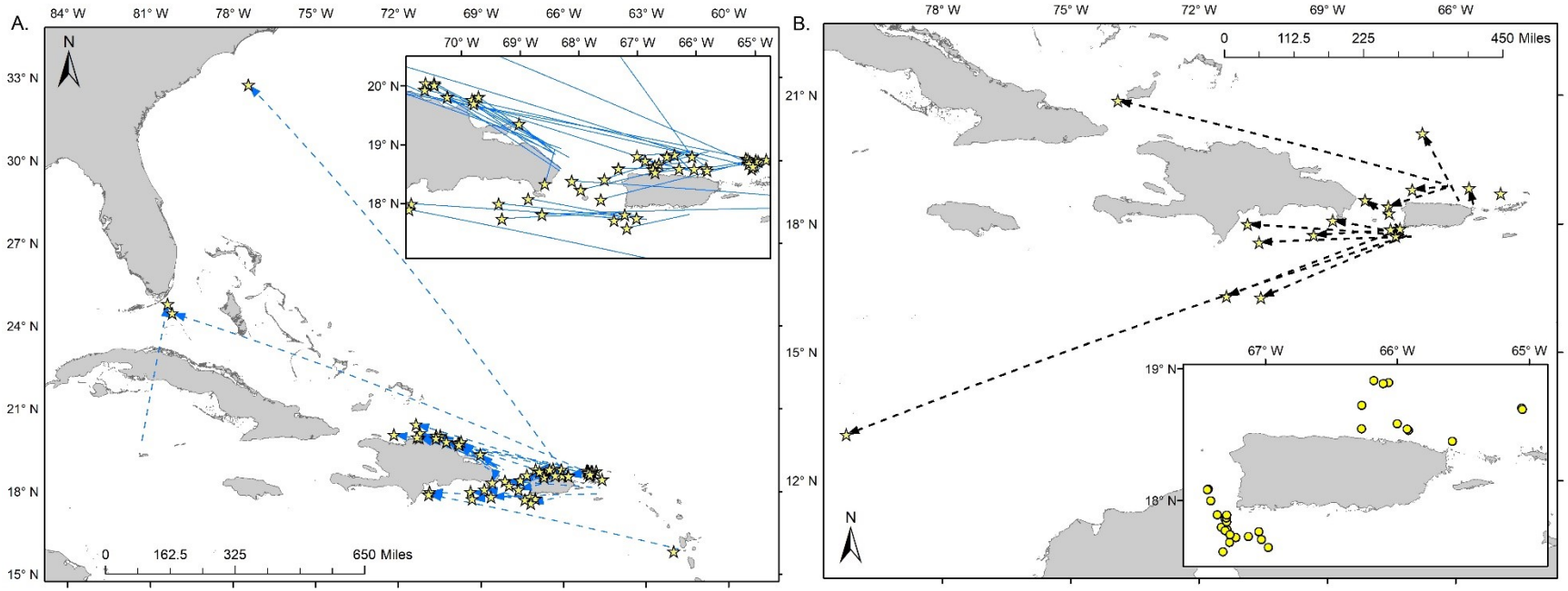

Figure 3 Straight-line conventional recapture movements (A.) and straight-line satellite tag movements (B.) from the U.S. Caribbean Sea and broader Caribbean Basin. The inset in subpanel A. shows short-term conventional recaptures off the North Drop, USVIs, Puerto Rico, and Dominican Republic. The inset in subpanel B. shows the deployment locations for 28 adult dolphinfish fitted and released with popup satellite archival transmitters (PSATs) from 2011-2022.