

Subject: Request to Evaluate a Prohibition on Jigging in Bajo de Sico to Protect the Nassau Grouper Spawning Aggregation

Dear Members of the Caribbean Fishery Management Council:

I respectfully submit this letter to request that the **Caribbean Fishery Management Council (CFMC)** evaluate the establishment of a specific prohibition on the use of **jigging** in the Bajo de Sico area of Puerto Rico as an additional measure to protect the **Nassau Grouper (*Epinephelus striatus*) spawning aggregation**.

Jigging has become an increasingly effective and widely used fishing technique for targeting a variety of reef-associated and pelagic species. Its effectiveness, however, can also create a conservation concern when it is practiced in an area where a protected species forms a documented spawning aggregation.

Bajo de Sico and Nassau Grouper

The importance of Bajo de Sico to Nassau Grouper is scientifically documented.

NOAA/NMFS has identified **Bajo de Sico as a Nassau Grouper spawning aggregation site**. Scientific information cited by NOAA also documents strong site fidelity by Nassau Grouper at Bajo de Sico, with approximately **80 percent of tagged individuals returning to the same aggregation site during the 2014–2016 tracking period**.

This is particularly significant because Nassau Grouper depend on specific spawning aggregation sites for reproduction. When fish concentrate in these relatively limited areas, they become substantially more vulnerable to fishing pressure.

NOAA Fisheries has identified fishing at spawning aggregations as a high-risk threat to Nassau Grouper recovery. The removal of spawning adults can reduce reproductive output and ultimately affect recruitment and population recovery.

For these reasons, protecting Bajo de Sico should be considered an important component of Nassau Grouper conservation and recovery efforts.

A Documented Interaction With Jigging

My concern regarding jigging is based not only on the biological importance of the area but also on an actual fishing interaction that occurred there.

Some time ago, a charter fisherman contacted me and sent me a photograph of a grouper that he had caught while using the jigging technique. He contacted me because he wanted to determine whether the capture was legal.

After examining the photograph, I identified the fish as a **Nassau Grouper**.

Fortunately, the fisherman released the fish alive.

I recognize that a single incident cannot be used to determine the frequency or magnitude of Nassau Grouper interactions with jigging. However, it clearly demonstrates that an interaction between this fishing method and Nassau Grouper can occur.

The fact that such an interaction occurred in an area with a documented Nassau Grouper spawning aggregation deserves consideration from a fisheries management perspective.

Existing Protection and the Need for Additional Evaluation

Bajo de Sico is already recognized as an important spawning aggregation area for reef fish, and seasonal management measures have been established to reduce fishing pressure during spawning periods.

However, the existence of a seasonal closure does not necessarily mean that every fishing method presents the same level of risk or that additional, gear-specific measures should not be considered.

Jigging is fundamentally different from several other fishing methods because it is specifically designed to actively attract and hook individual fish. In an area where Nassau Grouper aggregate and where the species is already protected from harvest, even occasional encounters can result in handling, stress, injury, or mortality if fish are

deeply hooked or otherwise unable to survive release.

For that reason, I believe it is appropriate to evaluate whether allowing jigging to continue in the Bajo de Sico area is fully consistent with the conservation objectives established for Nassau Grouper.

Request to the Council

I respectfully request that the CFMC consider the following actions:

1. **Evaluate the documented and potential interactions between jigging and Nassau Grouper at Bajo de Sico.**
2. **Review available information regarding Nassau Grouper abundance, size composition, seasonal presence, and spawning activity in the area.**
3. **Evaluate the potential for jigging to result in incidental capture, injury, or mortality of Nassau Grouper, including fish that are subsequently released.**
4. **Evaluate whether the existing management measures provide adequate protection from interactions associated specifically with jigging.**
5. **Consider establishing a spatial prohibition on jigging within the Bajo de Sico management area, particularly during periods when Nassau Grouper are present for spawning.**
6. **Consider whether an amendment to the applicable Puerto Rico IBFMP is warranted if the Council determines that such a measure would provide meaningful additional protection for the species.**

A Targeted and Precautionary Management Measure

I understand that fisheries management decisions must be based on the **best scientific information available** and should consider the economic and social impacts on fishermen and fishing communities.

My request is therefore not for a general prohibition on jigging throughout Puerto Rico.

Rather, I am asking the Council to evaluate a **targeted, spatially limited management measure in Bajo de Sico**, an area that has been scientifically documented as a Nassau Grouper spawning aggregation site.

Such a measure could provide an additional layer of protection for spawning Nassau Grouper while minimizing potential impacts on fishermen who use jigging in other areas of Puerto Rico.

Given the conservation status of Nassau Grouper, the documented importance of Bajo de Sico, and the vulnerability of spawning aggregations to fishing pressure, I believe that evaluating such a measure is consistent with a precautionary approach to fisheries management.

Conclusion

The recovery of Nassau Grouper represents an important conservation objective for Puerto Rico and the wider Caribbean.

Protecting known spawning aggregations is particularly important because these areas represent a critical component of the species' reproductive process. Bajo de Sico is not simply an area where Nassau Grouper have occasionally been observed; it is a **documented spawning aggregation site with demonstrated site fidelity**.

For that reason, I respectfully request that the Caribbean Fishery Management Council give serious consideration to evaluating and, if supported by the best available scientific information, establishing a **prohibition on jigging in Bajo de Sico**.

I believe such a measure could provide meaningful additional protection to Nassau Grouper while allowing jigging activities to continue in other areas where the conservation risk is lower.

Thank you for your consideration of this matter and for your continued efforts to protect and rebuild the marine resources of Puerto Rico and the Caribbean.

Respectfully,

Nelson Crespo

Puerto Rico District Advisory Panel Chairman