



August 5, 2023

Caribbean Fisheries Management Council
270 Munoz Rivera Avenue
San Juan, Puerto Rico 00918

Dear Members of the Caribbean Fishery Management Council:

The St. Thomas Fisherman's Association (STFA) is aware that there is the potential for an expansion of the area for both the Red Hind Marine Conservation District and the Grammanik Bank, south of St. Thomas, Virgin Islands. An increase in the area would include the closure of the corridor between the present closed areas. This corridor is referred to by the fishing sector as the "alleyway." The Grammanik Bank would receive an extension of time of closure.

The STFA supports the efforts to protect the Nassau grouper and encourages the protection of the marine ecosystem. However, we cannot manage with blinders on. The fishery of the St. Thomas/St. John district is a small boat and market-driven fishery. Virgin Islanders rely on the ocean as their main source of food. Seafood is the number one source of protein consumed in these islands. Managing the USVI fishery does not fit in the "typical" management toolbox, resulting in a complex task. As we, the USVI, are rich in culture and history, it is crucial to understand that fishing is a generational craft. Fishing is not a way to make a living, it is deeply rooted in our culture.

The USVI fishery currently is subjected to heavy-handed management. Closed areas, annual catch limits, species-specific closed seasons and size limits. Any additional loss of fishing area would have a significant effect on the fisher's ability to make a living and the people they service. Additional closure has a direct correlation to financial compensation.

Observations of Nassau grouper spawning occurred late this last season. It is important to note that the full moon occurred later in the months of December 2022 to April 2023. This occurrence may have resulted in a later than usual spawning period. Of greater significance is this unusual lunar cycle potentially is a once in every 7–10-year event. The STFA recommends effort be placed into looking at the lunar cycle for the last 10 years and at least the next 5 years. There is no need to extend the closed season if the future lunar cycles will coincide with existing management.

It is proven the closures and no possession regulations work. Since 2015, observations of Nassau grouper have increased in number and location. It has been protected by the Territorial and Federal governments for over 20 plus years.

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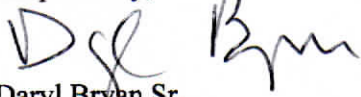
The question to be asked is “how much more protection will you put on a fish no one can catch at the cost of the people of the Virgin Islands?”

As the spawning season has already occurred for the 2022-23 season there is an opportunity for all of us to ensure that we make decisions based on data. The STFA recommends data be compiled on the following:

- What was the total landings recorded from the area referred to as the alleyway,
- How many fishers recorded landings from the alleyway,
- How traps were recorded in the alleyway and at what the month of the year,
- What data is there to substantiate that the Nassau grouper solely travel to and from the closed areas during the spawning season via the alleyway,
- Increase funding for outreach and supplies focusing increasing the survival rate of incidental capture. This would include instructions on “how to deflate a swim bladder”,
- Information on whether there have been any new spawning aggregations discovered inside or outside of the existing closed areas. If there are new areas, have they been studied.

The STFA wants to ensure that due diligence by everyone is a priority. We look forward to engaging in conversation with the hope of finding the best solution for the Nassau grouper and the people of the Virgin Islands.

Respectfully,


Daryl Bryan Sr.
President