



St. Croix Commercial
Fishermen's Association
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President

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Mr. Miguel A. Rolon
Executive Director
Caribbean Fisheries Management Agency
268 Munoz Rivera Ave., Suite 1108
San Juan, Puerto Rico 00918-1920

July 28, 2010

Dear Mr. Rolon:

The St. Croix Commercial Fisherman's Association (SCCFA) would like to take this opportunity to offer the following preferred Alternatives as it relates to the implementation of Annual Catch Limits for the island of St. Croix, USVI.

Set ACL's for both Commercial and Recreational fisheries in the proposed actions in Amendment 2 and Amendment 5 to the Reef Fish Fishery Management Plan for St. Croix, USVI.

Discussion: The SCCFA members believe that having one ACL would enable the Division of Fish and Wildlife better management of the harvested resource and would reduce the confusion between both fishing sectors and enforcement.

Action 1(a): Grouper Complex

Alternative 2

Action 1(b): Snapper complex

Alternative 2

Action 2(a) Snapper, Grouper and Parrotfish Complexes

Alternative 4: Redefine management reference points or proxies for the snapper, grouper and/or parrotfish complexes based on the most recent five years of available catch data.

Discussion: The SCCFA members believe that with the existing closures, expanded Buck Island Monument, and the prohibition of certain fishing gears post SFA has added more protection to the resource and less area for harvest by fishers, making the catch data more reliable.

Action 2(b) Queen Conch Complex

Alternative 4: Redefine management reference points or proxies for queen conch based on the most recent five years of available catch data.

Discussion: The SCCFA members believe that the emergency closure and quota implemented by the Department of Planning and Natural Resources was not scientifically verified nor was a study conducted for accuracy. Other than the spike which occurred in 2006 when conch was being exported to Puerto Rico, the St. Croix conch fishery is stable at around 120,000 lbs. In addition, the expansion of the Buck Island Reef National Monument a known habitat for conch is also

protected and the fact that conch is found in waters in depths beyond where divers can go, affording self protection. Also, the St. Croix Fisheries Advisory Committee recommended and was approved by the Commissioner of DPNR, to expand the closed season for harvest from 3 months to 6 months. The SCCFA recommends that the recent SEAMAP study conducted by DPNR's Fish and Wildlife be reviewed by the SSC and further consideration be given to the SSC's recommendation.

Action 3(a) Snapper and Grouper Unit Allocation/Management

New Alternative – Define aggregate reference points for the Snapper and Grouper Units for island specific.

Discussion: Due to Ciguatoin, the harvestable Snapper and Grouper between St. Thomas/St. John District and the St. Croix district vary greatly; therefore, aggregate reference points should be specific to each island.

Action 3(c) Geographic Allocation/Management

Alternative 2 (PREFERRED): Divide and manage annual catch limits by island group (i.e., Puerto Rico, St. Thomas,/St. John, and St. Croix) based on the preferred management reference point time series (Table 4.3.1 and Action 2). A. (PREFERRED) Use a mid-point or equidistant method for dividing the EEZ among islands.

Action 4(a) Species-Specific Parrotfish

Prohibitions

Alternative 2 (PREFERRED): Prohibit fishing for or possessing in the EEZ:

- A. Midnight parrotfish
- B. Blue parrotfish
- C. Rainbow parrotfish

Discussion: The SCCFA agrees with the motion made and forwarded by the FAC to protect these species of parrotfish in territorial waters, making it compatible with what is being proposed for the EEZ.

Action 4(b) Recreational bag limits

Alternative 7 (PREFERRED): Establish an aggregate bag limit for snapper, grouper and parrotfish FMUs of: 10 per fisher including not more than two parrotfish per fisher or six parrotfish per boat, and 30 aggregate snapper, grouper, and parrotfish per boat on a fishing day.

Action 5(a) Triggering Accountability Measures

Alternative 3 (PREFERRED): Trigger AMs if the annual catch limit is exceeded as defined below and NMFS' SEFSC (in consultation with the Caribbean Fishery Management Council and its Scientific and Statistical Committee) determines the overage occurred because catches increased versus data collection/monitoring improved:

(NEW) subpart (D) a single year of landings effective beginning a 2 year running average after implementation of the new Commercial Catch Reports.

Discussion: The SCCFA believes that the new CCR's should be given time to see a truer picture of species specific data and the amount being harvested.

Action 5(b) Applying Accountability Measures

Alternative 2 (PREFERRED): If AMs are triggered, then reduce the length of the fishing season for that species or species group the year following the trigger determination by the amount needed to prevent such an overage from occurring again. The needed changes will remain in effect until modified.

Action 6(a): Establish Framework Measures for Reef Fish FMP

Alternative 2: Amend the framework procedures for the Reef Fish FMP to provide a mechanism to expeditiously adjust the following reference points and management measures through framework action:

- a) Quota Requirements
- b) Seasonal Closures
- c) Area Closures
- d) Fishing Year
- e) Trip/Bag Limit
- f) Size Limits
- g) Gear Restrictions or Prohibitions
- h) Fishery Management Units (FMUs)
- i) Total Allowable Catch (TAC)
- j) Annual Catch Limits (ACLs)
- k) Accountability Measures (AMs)
- l) Annual Catch Targets (ACTs)
- m) Maximum Sustainable Yield (MSY)
- n) Optimum Yield (OY)
- o) Minimum Stock Size Threshold (MSST)
- p) Maximum Fishing Mortality Threshold (MFMT)
- q) Overfishing Limit (OFL)
- r) Acceptable Biological Catch (ABC) control rules
- s) Actions to Minimize the Interaction of Fishing Gear with Endangered Species or Marine Mammals

Action 6(b): Establish Framework Measures for Queen Conch FMP

Alternative 2: Amend the framework procedures for the Queen Conch FMP to provide a mechanism to expeditiously adjust the following reference points and management measures through framework action:

- a) Quota Requirements
- b) Seasonal Closures
- c) Area Closures
- d) Fishing Year
- e) Trip/Bag Limit
- f) Size Limits
- g) Gear Restrictions or Prohibitions
- h) Total Allowable Catch (TAC)

- i) Annual Catch Limits (ACLs)
- j) Accountability Measures (AMs)
- k) Annual Catch Targets (ACTs)
- l) Maximum Sustainable Yield (MSY)
- m) Optimum Yield (OY)
- n) Minimum Stock Size Threshold (MSST)
- o) Maximum Fishing Mortality Threshold (MFMT)
- p) Overfishing Limit (OFL)
- q) Acceptable Biological Catch (ABC) control rules
- r) Actions to Minimize the Interaction of Fishing Gear with Endangered Species or Marine Mammals

Respectfully,

Edward Schuster, Sr.

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