



St. Thomas Fishermen's Association

Protecting our Natural Heritage and Culture

July 7, 2009

Mr. Miguel Rolon
Executive Director
Caribbean Fishery Management Council
268 Muñoz Rivera Ave., Suite 1108
San Juan, Puerto Rico 00918-1920

Dear Mr. Rolon;

The following document provides comments on and recommended changes to the CFMC ACL Scoping Document. Please note that our comments only apply to measures affecting the St. Thomas/St. John District and that we have no comments regarding either Puerto Rico or St. Croix.

Introductory Comments:

The preface our comments we would like to make the following points:

1. The options contained in the document do not adequately address impacts taken following approval of the 2005 SFA Amendment. Thus, despite the much discussed shortcomings resulting from the absence of Virgin Islands data, certain management actions have been taken which have resulted in management responses by both the Council and the Territorial government. In each case these actions have resulted in changes in resource status. These have not been adequately considered in formulation of the current proposals.
2. The SFA determinations were made on a Caribbean-wide basis which does not address differences between districts. The CFMC have decided to manage each district separately. Thus, the SFA determinations of “overfishing” status need to be reconsidered for each district as they likely differ for each district. This has been carried forward into the current document. This needs to be corrected since “overfishing” as determined in the SFA document should not have been assumed to apply to each district.
3. While the SEFSC have been critical of Virgin Islands data and their failure to fit, selected models. No consideration has been given to surplus production analysis by the SEFSC. STFA analysis of Virgin Islands data for the St. Thomas trap fisheries indicates a highly significant catch-per-unit effort relationship that can be utilized to provide overall MSY values for these two fisheries. We will not

support any ACL that is not derived in this manner (which will be described in the following pages) or which is not based upon Virgin Islands data.

4. Port sampling has been carried out at a quality level since 2005 that can serve as an initial basis for subdividing overall landings figures (3) into species ACLs. This will avoid problems associated with grouping of species and allow for single species ACL development. These values should only be used as temporary values until such time as a revised data collection program is in place.
5. Current efforts to revise Virgin Islands data collection are underway. These will again face issues regarding the diversity of the trap fisheries but seem to be returning to the original USVI design whereby port sampling is used to supply species detail and verify information provided by fishermen. We recommend that consideration be given to sampling design for this effort so as to anticipate non-random sampling tendencies.
6. We repeat our suggestion that the following approach be used for establishment of OFL values for St. Thomas/St. John trap fisheries:
 - a. Consistent total landings values in the catch records are available from as far back as 1978.
 - b. Since 1990 fishermen have been reporting how many traps they haul daily.
 - c. There is also an historic record that can be constructed from the CCRs, TIP and Jack Dammann's 1968 report that allows for development of estimated trap hauls per day and which allows for the use of the complete time series.
 - d. Both of these show CPUE correlations that are significant at the $p < 0.01\%$ level.
 - e. MSY values can be developed as well as F_{msy} and F_{curr} for these two fisheries
 - f. For the percent (parrot fish) in the current round, the TIP sampling since 2005 can be used to provide an initial OFL/ACL value for each species of parrotfish. This will obviate the need to revise species groups.
 - g. Note that if this approach is accepted, it will provide ACL values for individual species which can be used in next year's effort.
7. Our position is that this ACL (on a species by species basis) should be put forward with the intention that the new data management program will be used to adjust the values as data become available and that any ACL proposal should include recognition that the new data collection program may lead to revisions in "current" ACL values.

Comments on St. Thomas/St. John Scoping Document Proposals

Action 3: ACLs for Parrotfish Unit 1 and Parrotfish Unit 2.

We propose that the Parrotfish Units be eliminated and actions taken by species following the approach outlined in (6) above. We propose that interim ACLs for each species be set by this method which will be revised following availability of data from the revised data management program.

Action 4: Annual Catch Limits for Grouper Unit 4.

Comment: “Overfishing” for this unit was based upon the presence of a spawning aggregation fishery in St. Thomas. Our estimate is that annual landings from this fishery were about 15,000 lbs. The spawning aggregation fishery has been closed since 2005 and an additional 3 month seasonal closure implemented. Our current estimate of St. Thomas/St. John landings for yellowfin grouper (*Mycteroperca venenosa*) are less than 10,000 lbs annually. Thus, the SFA actions have led to a 60% reduction in landings. The remaining species in this group are highly suspect for Ciguatera poisoning and are not fished.

We propose that this group be removed from over fished status and that OFL/ACLs be developed next year for each species in this group to be set by this the surplus production/recent TIP sampling method and that these will be revised following availability of data from the revised data management program.

Action 5: Annual Catch Limits for Snapper Unit 1.

It is our understanding from the last council meeting that the status of this species group is going to be changed to “Unknown Status”. However we feel that any St. Thomas/St. John ACL should recognize that this fishery is largely unfished. Thus, while current landings shown in 2005-Present port sampling can be used to establish the proportional species representation, they cannot be used to set an ACL.

We propose that No ACL should be set for any of these species in the St. Thomas/St. John district until the new data collection program can establish whether or not a stable fishery has been established.

Action 6: Annual Catch Limits for the Recreational Sector.

Given the near-complete absence of data on landings and targeted species we recommend that the St. Thomas/St. John recreational sector quota be set at no more than 10% of the commercial ACL for any species.

Action 7 Accounting for Uncertainty.

Comment: There has been no description of methodologies to be employed for determining uncertainty other than to say “the SEFSC will determine uncertainty”. It is our opinion that if the methodology for determination of ACLs described in (6) in the Introductory Comments is employed, that the high degree of statistical correlation should lead to low uncertainty and, consequently ACLs that are close to OFL values.

However, until we can be presented with the methodology whereby these determinations will be made we can only support Alternative 1 (No action. Set the ACL at the level specified in the previous sections).

Action 8: Alternative Methods for Reducing Fishing Mortality and Establishing ACL Proxies.

We understand from the last CFMC meeting that the proposal for closure of shelf areas is no longer an option under consideration.

We support the option presented by the STFA at the 130th CFMC meeting to “Work with fishermen to develop measure to reduce fishing mortality towards $F = F_{msy}$.”

Action 9: Permits.

In general, we support the idea of Federal Permits. However, until such time as details are presented, we can only support the No Action Alternative (1). Details should include:

1. Relationship to Territorial Permits.
2. Methods for enforcement.
3. Procedures for obtaining permits.
4. Requirements, eligibility and methods for limited entry management.

Action 10: Monitoring and Enforcement of Annual Catch Limits.

We note that none of these alternative is entirely consistent with the proposals currently under consideration by the Data Workshop.

We support the option presented by the STFA at the 130th CFMC meeting to “Work with fishermen and the SEFSC to develop a data collection form to be used in future data collection efforts adequate to meet ACL monitoring requirements.”

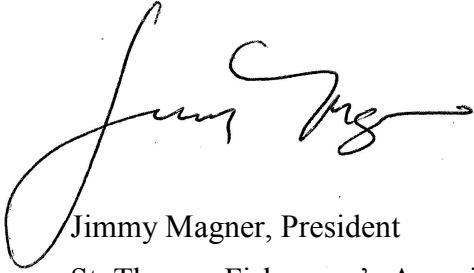
Action 11: Accountability Measures.

We do not feel that there has been adequate discussion of what, exactly, constitutes “Accountability Measures”. Thus, agreeing to conditions under which they might be imposed seems premature and we can only support Alternative 1 (No Action).

At the same time, the STFA recognizes that Accountability measures are a required part of the MSRA and remains willing to enter into discussions regarding such measures and the conditions under which they might be imposed.

We do feel that any accountability measure which might be triggered by over running an ACL should also take into account years in which landings were below ACL levels. Some of this is addressed by the proposed averaging schemes.

Thank you;



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