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FROM: Ricardo J. Lugo, Secretary  
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CC: Johnny Flores, President

DATE: November 22, 2016

SUBJECT: Asoc. Pescadores de Boquerón's Comments regarding the Fishing of Queen Snappers and Muniama de Afuera" in Federal Waters

### **EXECUTIVE SUMMARY:**

The Boquerón Fisherman Association is located in the bay of the Village of Boquerón, Cabo Rojo. At the present a total of 37 members (19 honorary and 18 fishermen), non of the members hold a Queen Snapper Permit at the present. We support the opening of both the Puerto Rico and the Puerto Rico exclusive economic zone Federal Waters for all the local fishermen. After collecting information from oral presentations made during the CFMC scoping meeting in Mayagüez by fishermen is clear that the actual data collected carry significant variances; thus all analysis conducted using the data collected shall be discarded. This is unfortunated and should be addressed immediately. We support the general opinion that a new data collection system shall be established for a period of three to five years with a dynamic participation of all fishermen. In addition, we recommend that all fisherman are members of a Fishermen Association Program sponsored by the Depatment of Agriculture. So, the data is collected by the association by fishermen, audited, validated and submitted by both the fishermen and the designated responsable person at the association. This process will work as a peer review without adding cost to the Department of Natural and Environmental Resources or NOAA. In addition, not all regions should be managed equal, some fisheries in Puerto Rico are impacted by the sea platform (Cabo Rojo, Fajardo, Culebra) so fishing for Queen Snapper can only be done only in Puerto Rico exclusive economic zone waters.

### **Comments on Action 1: Establish a commercial permit to harvest queen snapper and cardinal snapper.**

The Boquerón Fishermen Association **agreed with Option 2** that a commercial permit shall be established to harvest Queen and Cardinal Snappers (Snapper Unit 2, SU2 from the Puerto Rico exclusive economic zone).

In addition, **we agreed with Sub-Option A**: A complete open access to commercial permits. This will prevent any misunderstanding in the permitting process and prevent fishermen taking advantage of the privileges of owning a permit and selling it through a transfer. Fishing controls, volumes, etc. could be managed using other methods.

**We are not in agreement with Option 3:** At the present the Department of Natural and Environmental Resources are using the number of permits to control the amount of Queen Snapper, limiting other fishermen the opportunity to have an income during other species close seasons (Vedas). We recommend to have all licensed fishermen the opportunity to obtain a permit to fish Queen and Cardinal Snapper in federal waters.

**We agreed with Option 4:** A federal permit shall be required. Is important to limit the fishing of Queen and Cardinal Snapper to commercial fishermen only.

**We agreed with Sub-Option B:** Permits shall be allowed to the vessel, and should be one permitted vessel for each licensed fishermen only (not multiple vessels).

Regarding Option 5: **We agreed with a separate federal commercial SU2 harvest permit, for commercial harvest of queen snapper and cardinal snapper from the Puerto Rico EEZ.**

### **Comments on Action 2: Permit eligibility.**

**We agreed with Option 1:** Do not establish eligibility requirements for obtaining a commercial permit to harvest queen snapper and cardinal snapper from the Puerto Rico EEZ. **The only requirements shall be licensed fishermen in Puerto Rico.**

**We are not in agreement with Option 2:**

**We are not in agreement Option 3:** Some of the option will benefits a small group of fishermen that actual DNER Permits.

**We are not in agreement with Option 4 for same reasons as Option 3.** Comments Regarding Option 5, permits shall be issue to perform fishing in the US and PR Waters and not in other territorial waters like Dominican Republic, Virgin Islands or international waters.

### **Comments Action 3: Allowable gear.**

**We agreed with Option 2: The permit should define the gear to be used and the quantity per vessel for commercial harvest of queen snapper and cardinal snapper from Puerto Rico EEZ waters.**

**We agreed with Sub-option B: Bandit gear and two per vessel.**

### **Comments on Action 4: Allowable number of fishing trips.**

**We agreed with Option 2:** Specify a maximum number of allowable fishing trips per year for commercial harvest of queen snapper and cardinal snapper from the Puerto Rico EEZ.

**We recommend under Sub-option A: 24 trips a year / 2 per month.**

**Comments on Action 5: Commercial trip limits.**

**We agreed with Option 2:** Specify a commercial trip limit (in pounds) for queen snapper and cardinal snapper harvested from the Puerto Rico EEZ.

**We recommend Sub-option A: 100 pounds whole weight.**

**Comments on Action 6: \* Reporting method for fishers commercially permitted to harvest queen snapper and cardinal snapper from the Puerto Rico EEZ.**

**We agreed with Option 4:** Allow fishers reporting landings of queen snapper and cardinal snapper from the Puerto Rico EEZ to choose between the PRDNER commercial catch reporting form or an electronic reporting method.

**Comments on Action 7: Frequency of reporting for fishers permitted to harvest queen snapper and cardinal snapper from Puerto Rico EEZ waters.**

**We agreed with Option 1 (No Action):** Do not specify a frequency for submitting landings reports of queen snapper and cardinal snapper. Puerto Rico requires that fishers submit landings reports of commercially harvested queen snapper and cardinal snapper from territorial waters within 60 days of the fishing activity. **However, the Article 11 of the “Reglamento de Pesca de Puerto Rico – 2010” requires that statistical report should be submitted monthly by the fishermen within a of 60 days.**

Thanks for the opportunity to participate.

End of Comments.