
Subject: Comments related to modifications of the areas Abrir la Sierra, Bajo de Sico and Torumaline

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My name is Capt. Roberto Reyes.

Am representing my business, and Puerto Rico Freedivers spearfishing club with 136 members, FB spearfishing groups and also all the tourists that have come and want to come to do spearfishing in the areas proposed to be closed.

I have a charter business that will be adversely affected by this new proposed laws, we make blue water hunting charters only for pelagics in Bajo de Sico, and since there is no representation for spearfishing in your federal advisory panel I hope you use the data in the public hearings in the west coast and understand that none of the local fishermen wants closures of spearfishing in the areas that they are proposed to. The only one I heard was a commercial fisherman who claims that if they can't fish there, we should not be allowed also, but as right now, commercial fishing is allowed on Sico. He is part of the Caribbean counseling and he proposes these things, then go to the public hearing and also claims to have 40 fishermen in his village that agree with him, but then on the public hearings all his fishermen were against him. But his proposals are already in the alternatives to be chosen and this is highly unfair and maybe illegal.

**The kind of spearfishing for pelagics that's done in the areas is called Blue Water Hunting, (ask any of the scientist that knows about this kind of spearfishing and you will see it has no impact whatsoever) it's done with very large speargun (very hard to load and use and used only for specific fish), that are not feasible to use on a coral reef, it's the hardest kind of spearfishing and is done in a way that does not allow many fish to be captured, only specific fish like wahoo, mahi mahi, or tuna, we asked for the tuna permits to the HMS permits many years ago so we could spearfish for tuna, they came here to PR and I personally talk to them and ask for the permits, they are allowing us to spearfish these pelagics because they did their investigations with others like me and we got the permits.

Even a TV program from national Planet came to Puerto Rico, and I personally filmed with them blue water hunting, these areas that you are closing on us are extremely important for tourism, you have already closed Mona island, Desecheo, these are the only places left for us to take spearfishermen

to do blue water hunting (spearfishing for pelagics) in the west coast, you will hurt my business and others with no reason, you are actually punishing the groups that really obey the laws.

When you were asked why the spearfishing closures there were not scientific data, but allegations of "there will be too much temptation to go for the reef fish", or "anyone can dive 90 feet and spear a fish there".

No one goes to a reserve geared for pelagics and goes after reef fish, reef fish are everywhere else, and no one wants to get in trouble with federal laws and going 90 feet to be spearfishing is very very hard, good divers can go a few times, but all day is asking to die, when you are in a place with wahoo and mahi mahi is ridiculous to be trying for reef fish, these pelagics are on the upper water column, we have always seen the reef fish there even when it was legal to go for them, and we stay focused on the real price that we can't find nowhere else.

The fishing club that you are going to punish in Puerto Rico has more than enough proof that are ecological fishermen, I personally am a volunteer of 16 years of the US Coast Guard auxiliary, we as a spearfishing club always do beach cleaning events, when the lion fish first appeared in our waters, even before you made any efforts to control it, we were doing lion fish tournaments, spearfishermen in Puerto Rico did them with our own money to protect the ecosystems that you claim now are in danger because of spearfishermen. I personally went to a public hearing of you, and asked to be a member of the Advisory panel, I was for a few years until I was replaced by a commercial fisherman in a board that has no representation of Recreational (charter) spearfishermen.

We are asking to allow fishing for Highly Migratory Species and for coastal migratory pelagics year round (as is now in Bajo Sico) on all 3 areas. There is enough coast guard and other law enforcement agencies in the area, more than in any other area of Puerto Rico due to that the west coast has an illegal traffic of Aliens (Dominicans mostly) and they have always stopped me and others fishing in the area, they verify our fish in the coolers and even fishing gear. Fishing for Highly Migratory Species and for coastal migratory pelagics should be allowed with to an art form that has no by catch, it's extremely ecological and it's such a hard and difficult way of fishing that it's obvious that responsible people are the ones who actually do it.

Please, don't take away our chance to spear fish a Wahoo, mahi mahi or tuna in the area of Bajo Sico, some spearfishermen from other parts of the world who used to come for pelagics at Mona or Desecheo now can't because these areas of the west coast have been closed and we can't make our money taking them there, we respect the laws and it would be very unfair to have these areas closed to us exactly in

the months that this fish are there, they are only a few months in our waters and they will be fish for in other countries (ex, Dominican republic) that are not protected.

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